

Comments in WC Docket 02-6 (relate to request for public comments as stated in WC Document 08-180A1).

Request that content filtering be an approved expenditure eligible for discounts under the Schools and Libraries program.

The Internet and access to it have grown substantially since schools and libraries first began using it in their facilities, to provide access to educational and informational materials they would not otherwise have.

But at the same time, nefarious parties have also used the Internet to hawk products and services that are harmful to students, teachers, administrators, and others who work in schools and libraries or are students or patrons at those facilities respectively.

Therefore, web content filtering has become a must to prevent exposure to pornography, gambling sites, spyware sites, and other sites containing inappropriate or unlawful content. After 9/11, it was discovered that the hijackers had used the Internet facilities at public libraries to exchange communication and view sites related to what they were planning (various news reports exist to this effect).

A good content filter will block much of the worst of this, and in the end will protect the school or library from legal liabilities associated with allowing patrons access to these nefarious sites. Most will have categories that are innocent (used for businesses to restrict access to non-company-related business or 'time wasters') but schools and libraries would only need to block the worst of the material.

By definition, the categories they would need to be able to restrict access to are:

PORNOGRAPHY: Material that depicts sexual and excretory acts, including intercourse, masturbation, and other acts involving the genitalia. Sites that discuss health issues related to sexuality that may show anatomical drawings or pictures of anatomical matters would more appropriately be categorized as 'sex education' and almost all filtering mechanisms have a category now. One of the liabilities would best be defined by a recent court case where a city was sued by the city librarians because they were exposed to very graphic pornography because of the lack of a content filter. Especially teens were leaving behind screens, including the large screens provided for the disabled, filled with large images of pornography, and when the city refused the request of the librarians for one, they sued the city.

GAMBLING: Sites that provide gambling games, betting, etc., are in this category. It is illegal in

some states to use these sites anyway, largely a legal liability if someone is caught using and successfully fends off the charge and then ends up suing the facility for providing the access.

NUDITY: Similar to porn, but does not depict sexual acts, including nudist sites. An individual was prosecuted for viewing these sites where they had pictures of nude children, under child porn laws after a librarian observed him viewing these sites, in Utah a few years back.

SPYWARE/MALWRE SOURCES AND PRIVACY EFFECTS/CONCERNS: This is a growing problem, could result in considerable non-discounted expenses for cleanup to the library or school if this material and sites were not blocked. These sites when visited, either automatically ('drive-by install') or request the user to click on a link to download a piece of software that the site says is one thing but really is another. This includes trojans, keyloggers, and many other types of malware, and other things that can cripple, disable, or otherwise cause expensive repairs and cleanup for the entity that owns the computer hardware. The links to many of the worst sites are spread by email, but others may innocently visit a known site that surreptitiously installs a piece of malware. Not to be confused with tracking cookies offered as a 'placeholder' or to allow one to re-visit a page without re-entering his/her username and password.

VIOLENCE/HATE SPEECH/RACISM: This one is important because it is the category that may help in Homeland Security efforts to prevent access to known terrorist sites. Also blocks sites for known hate gangs and groups that discuss plans to do things, among other things.

PHISHING: Ever received a 'bank notice' email? Usually it is a phisher, under the printed link is a link to a site that pretends to be the bank site. Other financial sites are often faked as well. This is a common method used by identity thieves. When used in concert with phishtank.net, can be used to effectively block almost all phishing sites starting very shortly after they appear online.

There are probably a handful of other categories that need to be included, but the vast majority of categories, such as restaurants, news/media, sports, etc., should be off-limits to being blocked. The one exception is if the school or library wanted to have a 'kids area' and since some providers include

There are many filtering providers, but only a few are of the quality that schools and libraries need. Examples of the best of class providers include but are not necessarily limited to:

Blue Coat Systems: Provides proxy box for filtering, site database is stored on the company's computers so no internal database is kept on the school or library's computer systems. At bluecoat.com. I've used their consumer free home product and it is updated almost 24/7.

Websense (websense.com) Another good one as well.

Fortinet (Fortinet.com) One I've also had good experience as an end user.

There are others, but I consider from personal experience as the end user at library installations to allow the good and prevent problems caused by the bad.

The next issue I need to have allowed, and your decision to not allow discounting on the item is likely trumped by the Americans with Disabilities Act. That is your decision not to allow discounting or reimbursing for purchase/maintenance of large screen monitors. While browser functions can help the blind and other disabled individuals, browser functions alone do not go far enough in many instances. Therefore, to provide both accomodation and accessibility, the school or library, may be asked to purchase one or more such monitors.

Because you disallow the expense as one eligible for discounting or partial reimbursement, this may lead to legal liability if someone were to file an Americans with Disabilities Act complaint at the appropriate office provided for in the act and defined by subsequent court decisions if the school or library refuses to make the accomodation or do this to make the library accessible.