



Comments on FCC Open Internet NPRM
Safe Internet Alliance

Thank you for the opportunity to comment on this very important Open Internet proceeding before the Federal Communications Commission. The mission of the Safe Internet Alliance is “*to promote a safe Internet and better educate and protect all users, especially children, teens and the elderly, from Internet corruption, crime and abuse*” -- a mission we are confident that the FCC heartily supports.

We know American consumers and businesses want and need a safe Internet. If the Internet is not a safe and secure place for users, then social networking and ecommerce, as well as all other benefits of an open Internet are hindered, undermined or put at risk. The FCC’s desired benefits of an open Internet: free speech, innovation, economic prosperity, democratic participation, e-learning, tele-medicine, etc., cannot be realized if the Internet is not safe and secure.

The unfortunate reality is that Internet safety/security problems and threats are getting worse:

- Cyber-security (terrorism, warfare, & espionage);
- Cyber-crime (piracy, identity theft, hacking, financial crimes, spam, phishing, fraud, etc.);
- Cyber-pollution (viruses, malware, trojans, worms, botnets, denial-of-service attacks, etc.); and
- Invasion of privacy (spyware, cyber-stalking, cyber-bullying, etc.).

There has been much discussion about the need for an open Internet. Safe Internet recommends that the FCC focus on addressing Internet safety and security, where much work remains to be done, so that the priority is on creating a safe Internet. An open Internet that is not a safe Internet will undermine growth of the Internet market and the confidence of software designers, manufacturers, businesses, providers, law enforcement and users. Shifting the primary focus away from increasing the security and safety of the Internet and users before we’ve made greater progress could have unintended consequences.

The Safe Internet Alliance is troubled that the FCC’s proposed preemptive Open Internet regulations only state that they are *not intended to adversely affect law enforcement, public safety, and national/homeland security*. We are concerned this falls short of the mark, and that in every action we need to strive towards increased safety and security measures, rather than set as our goal that we not decrease protections.

The Safe Internet Alliance would also like to express unease regarding the sweeping and ambiguous nature of the terms *law enforcement, public safety, and national/homeland*

security as used in the proposed regulations. As with all proposals, the devil is in the details. The interpretation as to what constitutes an appropriate or inappropriate action taken to assist or ensure that *law enforcement, public safety, and national/homeland security*, are not adversely affected remains an unfortunate gray area that has the potential to create serious unintended consequences that could undermine Internet safety/security, law enforcement, public safety, and national/homeland security.

In short, the Safe Internet Alliance respectfully urges the FCC to take extra care in keeping safety and security top priorities, and to tread cautiously to avoid exacerbating real and worsening Internet safety/security problems.

Thank you for the opportunity to comment. We would be glad to meet with FCC staff if our expertise and insights would be helpful in ensuring that the Internet can continue to live up to its exceptional promise.

Sincerely,

Linda Criddle, President
Safe Internet Alliance
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