

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Empowering Parents and Protecting Children in an) MB Docket No. 09-194
Evolving Media Landscape)

COMMENTS OF AT&T

AT&T is pleased to continue its participation in the Commission’s on-going dialogue regarding the rapidly evolving electronic media landscape and the roles that all stakeholders (government, industry, public interest groups, parents, and, not least, children themselves) can and should play to enable children to become responsible digital citizens and take advantage of the myriad opportunities and benefits presented by electronic media, while at the same time protecting children from the many risks posed on-line. As a leading provider of wireline and wireless communications and information services in the United States and world-wide, AT&T has a critical stake in ensuring that consumers understand those risks, are empowered through educational initiatives to be safe and responsible online citizens, and have appropriate tools available to help control their online experience.

As we discussed in response to the Commission’s notice of inquiry soliciting information for its Report to Congress pursuant to the Child Safe Viewing Act of 2007, AT&T has long been committed to developing, deploying and encouraging the use of parental control tools to protect children on-line, and to empower parents to decide for themselves what media content is

appropriate for their children and limit their children's access accordingly.¹ AT&T thus has implemented a variety of parental empowerment tools across its full-range of services that enable parents to limit their children's access to content and establish limits on the technology their children use on a daily basis. And just as the electronic media landscape continues rapidly to evolve, so too have we continued to work on new and improved tools and methods to address the evolving challenges and risks posed to children in that environment. We also have continued to work with industry, parents groups, government officials and other organizations to identify and promote best practices, and to educate parents and children regarding the benefits and risks online, as well as the tools available to protect children.

AT&T is a leading member of the Family Online Safety Institute, which is an international, non-profit organization (whose members include broadband service providers, wireless providers, content providers, technology companies, and trade associations) working to make the online world safer for children and their families. AT&T thus worked closely with FOSI in preparing its comments in response to the *Parental Empowerment NOI*,² and fully endorses the points made therein. We write separately to highlight some of AT&T's many efforts to educate parents and children regarding Internet safety and to promote media literacy.

¹ Comments of AT&T Inc., MM Docket No. 09-26 (filed April 16, 2009). AT&T understands that the Commission will incorporate its comments by reference into the record on the instant proceeding. *Empowering Parents and Protecting Children in an Evolving Media Landscape*, MB Docket No. 09-194, Notice of Inquiry, FCC 09-94 at para. 10 (rel. Oct. 23, 2009) ("*Parental Empowerment NOI*") ("we incorporate the comments filed in the CSVA [Child Safe Viewing Act] proceeding by reference into the record in this NOI"). Accordingly, AT&T will not repeat the points it made in those comments here.

² Comments of Family Online Safety Institute, MB Docket No. 09-194 (filed Feb. 24, 2010).

AT&T's Education and Outreach Efforts

AT&T continues to work with a variety of organizations that promote online safety education and awareness. These include FOSI, Enough is Enough, iKeepSafe Internet Safety Coalition, Connect Safely and the Ad Council's Internet Safety Coalition, each of which strives to educate parents and children on how to be safe on the Internet. For example, in September 2008, AT&T and iKeepSafe launched an educational program with D.A.R.E. officers at schools in various parts of the country to promote online safety. This program, which is expected to reach more than five million children, targets children in grades 1-5 as well as parents, teachers and local community organizations, and provides information regarding online risks, and the measures children, parents and teachers can take to protect children. To date, more than 3200 officers have been trained on the program. We also are participating in a program with iKeepSafe and the American Counselors Association that will teach high school children how to protect their privacy. In addition, just last week, with the support of AT&T and other sponsors, Enough is Enough announced the launch of its *Internet Safety 101SM* education program, which utilizes a DVD teaching series, workbook and website to help educate and empower parents, educators and other caregivers about online safety.

AT&T also works with elected officials on a variety of community outreach initiatives, providing support in community forums and town halls, and educational materials for parents. For example, as part of this effort, we have worked with the National Partnership for Safe Computing to educate the public about how they may take control of the security of their computing experience and the safety of their family's online activities through "town hall" meetings in congressional districts throughout America.³

³ <http://www.safecomputingtownhall.org>.

Last year, AT&T launched a cyber safety educational program for mature Americans, *Safe Surfing* in a variety of cities throughout the country, as part of its Mature Adults Connected (MAC) Initiative. That initiative seeks to educate mature adults regarding the benefits and risks of online media, and to provide them the information they need to protect themselves online. We also have helped thousands of English and Spanish-speaking mature adults stay connected by working with our partner organizations – OASIS and SeniorNet – to teach them how to use their wireless devices more safely and efficiently through one-on-one coaching sessions (no matter who their service provider is). Building on this experience, AT&T has expanded its wireless one-on-one coaching sessions to help more than 100 blind and sight-impaired consumers to use their mobile devices more efficiently and safely, and plans to expand our outreach with this community in 2010. More recently, we have begun a program designed to help seniors learn how to safely explore social networking sites so they can stay better connected to friends, activities and resources. To date, these programs have assisted more than 6,000 seniors learn to stay safer in the digital world.

AT&T also maintains an educational website where all consumers can find information regarding on online safety. This website compiles safety information for each of AT&T's services, and provides tips on the latest scams and other safety issues to help keep parents, children, and, indeed, all consumers safely connected. This website can be found at www.att.com/safety. In addition, AT&T maintains another website at www.att.com/smartlimits that provides comprehensive information about the parental control tools and services we provide to our customers in association with our consumer products across the three screens – Internet, mobile, and television.

AT&T's Privacy Initiatives

AT&T recognizes that while privacy is a concern for all online participants, there are unique privacy concerns for children. For example, there are very serious consequences (including reputational and psychological harm, as well as potential legal consequences) that can result from sexting, cyberbullying and other conduct that compromises an individual's privacy, and thus protecting privacy thus is a critical component of online safety, particularly for children. As a consequence, AT&T has launched a number of educational and outreach programs to teach parents and children about the importance of protecting their privacy, as well as initiatives to protect its customer's privacy online. For example, in 2009, we joined iKeepSafe, in partnership with the American School Counselor Association, to launch Project PRO: Privacy and Reputation Online, a privacy education initiative in 2009 for middle and high school students throughout the country. Project PRO provides resources to help students nationwide understand the importance of security and online reputation. These resources:

- Help educators coach youth on protecting and managing their digital reputation,
- Motivate parents to communicate with their child about the potential impact of their digital reputation and utilize the latest technology available to observe and monitor their child's online activities and postings, and
- Share the stories of teens whose school or employment opportunities were affected either positively or negatively by their online reputation.

This initiative thus provides important privacy lessons to students to help them build positive online portfolios for their future. To date, more than 4200 counselors and educators have requested the materials for use in their schools. More information on Project Pro is available at: www.ikeepsafe.org/asca. AT&T also has sponsored numerous town hall meetings and forums regarding online safety and privacy in various states across the country, including Texas, Connecticut and Minnesota.

In addition, AT&T recognizes that customers will have a better online experience and be better able to protect their privacy if there is transparency regarding the collection and use of their information. Consequently, this past summer, we developed and published an updated, consolidated and streamlined privacy policy that applies, with very limited exceptions, across all of AT&T's business units and services. AT&T relied heavily on customer feedback to shape this new policy, and in developing a consumer-centric, plain language presentation that clearly explains to users what data we collect, how we collect it, and how we use it. Our roll-out of this new policy included video explanations of our policy highlights, as well as a 45-day preview period for customer feedback. Based on that feedback, AT&T made several clarifications to the policy – including adding clear definitions and specifically confirming that we do not sell, give or “rent” personal information to marketing companies – before posting the final version of that policy.

AT&T's Participation in Industry Initiatives

Given the wide variety of content and service providers, and other stakeholders, in the Internet ecosystem, AT&T believes industry initiatives are critical to ensuring and promoting media literacy and online safety among children and their families. Consequently, such initiatives are an important component of AT&T's efforts to create a safer online environment. For example, as noted above, AT&T plays a leadership role with the Family Online Safety Institute (www.fosi.org), which works to make the online world safer for kids and their families by identifying and promoting best practice, tools and methods in the field of online safety, that also preserve free expression. FOSI brings together leaders in government, industry and the nonprofit sectors to collaborate and innovate new solutions in child safety in Web 2.0 world.

Through FOSI, AT&T collaborates with fellow leaders in technology, public policy and government on online safety issues.

Conclusion

Today's rapidly evolving electronic media landscape offers children and their families myriad opportunities and benefits. Among other things, electronic media provide children unparalleled access to information, offer new and exciting forms of communication with family and friends throughout the world, and enable them to develop technological literacy and a variety of new communications skills that their parents and grandparents never could have dreamed of. But with these benefits have come a variety of risks. All stakeholders, government, industry, parents and children themselves have a role to play to ensure that children are safe online and become knowledgeable and responsible cyber-citizens. AT&T and other service providers are doing their part by developing and deploying a broad array of parental control technologies and other tools that empower parents to protect their children and keep them away from inappropriate content. The government, including the FCC, has an important role to play by encouraging further research, development and deployment of such technologies, and, perhaps most importantly, by supporting, funding, sponsoring and spearheading educational programs to empower parents, teachers and children regarding online risks and the technologies and tools available to mitigate those risks and, more broadly, to enable them to be safe and responsible digital citizens. Government also can provide a forum in which all stakeholders can come together to communicate and exchange information about emerging online risks, best practices and advances in control technologies to address those risks. However, it is critical that the government officials recognize that there is no single solution or silver bullet to protect children and their families online. Accordingly, the Commission should not seek to encourage or impose

uniform standards or mandatory rules regarding parental control technologies and methods, but rather should ensure that service providers have the flexibility they need to develop new tools and initiatives to empower parents to protect their children online as new risks or challenges emerge.

Respectfully submitted,

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