



Comments Preserving the Open Internet Broadband Industry Practices
Safe Internet Alliance

On behalf of the Safe Internet Alliance, I submit the following recommendations for increased online consumer protections as part of proposed open Internet regulations. 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 crime and abuse” -- a mission we are confident is shared by the FCC and one we hope will rise in importance through this public process.

The value of an accessible and open Internet is threatened by increasingly lax online consumer protections and the vulnerability of users' personal information. The online experience for all Americans should be first and foremost a secure one.

Enabling user rights, providing users with control over access to their personal information and the ability to manage the type of content they and their families view online must become fundamental principles if we want current users to feel safe and adoption of the Internet to grow among new user groups.

These basic principles should be at the core of our national plans for open Internet expansion and increased adoption, to ensure that we have an Internet that is both open AND safe.

There are many sterling examples of corporate responsibility online -- companies that respect users and protect customers. Most companies, including flagships Microsoft, Yahoo! and AOL have clear, consistent and informative consumer protection policies and post notices for users.

Unfortunately, other companies trade consumer privacy for profit. Recent changes in Facebook's Public Policy allowing the company to sell their users' private and personal information, and Google's Buzz deployment, are but the latest indication that user rights aren't assured. Many exploitive practices are in common use.

We need to encourage innovation in building safer online products that respect consumer's online experience and information. We need to establish industry best practices for consumers facing online services. And we need to create an empowered and educated user base that understands how to navigate the Internet safely and identify which services are complying with industry best practices.

Increased openness should lead to increased incentives.

There is great opportunity for technological innovation in the field of consumer protection. As adaption and online uses increase, products and services designed specifically for consumer protection will be in demand. Creating incentives for innovation of products and services designed for the public good should be part of the FCC's plan for an open Internet. The Safe Internet Alliance urges the FCC to encourage all companies with a web presence to employ consumer safety and privacy best practices in every aspect of their product development, testing, support, and within their consumer services.

Consumers have the right to an informed online experience.

Consumers should be informed of all safety resources and information provided with products and services. Also, consumers should be notified in advance of any potential safety or privacy risks in products, web programs and services such as instant messaging or social networking sites, so that they can make safe choices. This is particularly critical during the signup and registration process, during which consumers should be walked through the process of establishing privacy and safety settings. Established users should be warned in advance of any changes to policy or features that affect their safety or privacy. Additionally, consumers should have a clear way to opt out of, or block, any features they do not understand or are unwanted.

Consumers have the right to set individual terms for their online experience (within the constraints of the law).

Consumers should be empowered to take control of how their personal information is viewed or monitored online. Users should understand that they have the right and the technological capability to block content they do not wish to see, and the right to block individual users, groups of users, unknown users, or types of users from contacting them. In addition, users should know if they are being monitored online and how they are being monitored—specifically, which of their activities are being tracked and by whom.

Consumers have the right to expect online products and services to guard their safety and privacy.

Personally identifiable information (PII), or indirectly identifiable information (III) belongs solely to the individual user and only with their permission may sites become stewards of that information to enhance the online experience. Users have the right for their personal information be removed from any use they have not approved. In addition, all users should feel confident that products and services will not be released to the public without undergoing rigorous safety, privacy, and legal reviews and testing. Users should be able to easily understand the privacy and safety policies of online products and services.

In short, there is an opportunity during this time of development of an open Internet to place a premium on deploying quality online consumer education and increasing the protections afforded consumers as you engage both public and private sector leaders in the process. The industry has many excellent examples with high standards in these efforts. For self-regulation to be a successful model moving forward, however significant improvements need to be made, and pressure brought to bear on companies that fail to adequately protect and respect consumer's safety and privacy.

We look forward to working with the FCC to bring greater awareness of these principles to create an open AND safe Internet.

Sincerely,

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