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**Before the
Subcommittee on Consumer Protection, Product Safety, and Insurance
Committee on Commerce, Science & Transportation
United States Senate**

**“An Examination of Children's Privacy:
New Technologies and the Children's Online Privacy Protection Act”**

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Chairman Pryor, Ranking Member Wicker, and honorable Members of the Subcommittee, thank you for the opportunity to share Microsoft's views on children's privacy issues raised by new technologies and the Children's Online Privacy Protection Act (COPPA). Microsoft has a deep and long-standing commitment to protecting the privacy of consumers, including children, who use our software and services. We appreciate your initiative in holding this hearing today.

This hearing is timely. Ten years ago this month the Federal Trade Commission's COPPA Rule took effect. At the time, COPPA's stated goal was to preserve "the interactivity of children's experience on the Internet."¹ That goal remains essential today. Research has found that children gain important educational and social benefits, such as increased opportunities for learning and creativity, by engaging in interactive activities online.² And children are realizing these benefits as they increasingly use new technologies to access the Internet, including mobile phones, video game consoles, and portable media players.³

¹ 144 Cong. Rec. S12787 (1998) (statement of Sen. Bryan); *see also* 64 Fed. Reg. 59888, 59889 (1999) ("In drafting this final rule, the Commission has taken very seriously the concerns expressed about maintaining children's access to the Internet.").

² *See, e.g.*, Carly Shuler, Joan Ganz Cooney Center at Sesame Workshop, *Pockets of Potential: Using Mobile Technologies To Promote Children's Learning* 13–14, App. A, B (2009), http://www.joanganzcooneycenter.org/pdf/pockets_of_potential.pdf; National School Boards Association, *Creating & Connecting: Research and Guidelines on Online Social — and Educational — Networking* 1 (July 2007), <http://www.nsba.org/SecondaryMenu/TLN/CreatingandConnecting.aspx>.

³ According to the Henry J. Kaiser Family Foundation, children 8- to 10- years old spend about 30 minutes each day browsing websites, posting to social networking sites, and sending instant messages and e-mails to friends and family. This number more than doubles for older children. *See* Henry J. Kaiser Family Foundation, *Generation M²: Media in the Lives of 8- to 18-Year-Olds* 20 (2010), <http://www.kff.org/entmedia/upload/8010.pdf>.

But, as we all recognize, these interactive technologies often enable consumers to disclose personal information online, and children may not fully understand the terms or the trade-offs involved. COPPA was designed to address this issue. Microsoft fully supports COPPA's objectives of enhancing "parental involvement in a child's activities" and protecting "children's privacy by limiting the collection, [use, and disclosure] of personal information from children without parental consent."⁴ While children's use of the Internet has evolved over the last decade, these objectives remain just as — if not more — important today. Privacy failures can have a real impact on children's safety. Therefore, Microsoft has developed strong privacy practices regarding how children's personal information is collected, used, and disclosed online.

Today, I want to begin by discussing Microsoft's comprehensive approach to protecting children's privacy online. I then will identify those areas where the COPPA Rule has made progress over the last decade and highlight a couple of key challenges that remain. My testimony concludes by describing promising identity management and privacy enhancing tools that can help address these challenges.

MICROSOFT'S COMPREHENSIVE APPROACH TO ADDRESSING CHILDREN'S PRIVACY

Microsoft takes a number of steps to help protect children's privacy and safety through our own products and services, educational initiatives, and partnerships.

First, Microsoft requires parental consent and offers parental controls for a number of our products and services. For example, our Xbox Live, Spaces, Messenger, and Hotmail services request age information in a neutral manner during the registration

⁴ 144 Cong. Rec. S12787 (1998) (statement of Sen. Bryan).

process. If a child indicates he or she is under the age of 13, we seek and obtain parental consent before the child is permitted to participate in interactive activities offered by these services.

In addition, our parental controls for Windows 7, Windows Live, Xbox 360, Zune, and other services help parents make granular choices about how their children may share personal information online. For example, our Windows Live Family Safety tool enables parents to limit their children's searches; block (or allow) websites based on the type of content; restrict whom their children can communicate with in Windows Live Spaces, Messenger, or Hotmail; and access detailed activity reports that show the websites their children visited and the games and applications they used.⁵ Importantly, we have designed our family safety settings such that the settings can roam across different types of devices through which children may access these online services.

Second, Microsoft engages in educational efforts around the world to encourage parents and caregivers to talk to their children about online privacy and to assist them in making informed decisions about their children's Internet use. For example, Microsoft provides parents with a number of educational resources to help them preserve their children's privacy and protect their children from inappropriate content, conduct, and contact online.⁶ And Microsoft works to raise awareness of children's privacy and safety

⁵ See Attachment. Because we believe that consumers should be notified that they are being monitored to prevent abuse, children are provided on-screen notice where these tools provide parents with monitoring capabilities and these capabilities are engaged.

⁶ See, e.g., <http://www.microsoft.com/protect/family>.

issues by sponsoring roundtables with local and regional policymakers, academics, the media, and other thought leaders.

Third, Microsoft partners with government officials, industry members, law enforcement agencies, and child advocates to address children's privacy and safety issues. For example, we support GetNetWise.org, which offers parents and children resources for making informed decisions about Internet use. We also are an active participant in the National Cyber Security Alliance and its online website Stay Safe Online, which encourages children and parents to discuss topics such as disclosing personal information through Internet chat rooms, e-mail, and websites. In addition, Microsoft works closely with the International Center for Missing and Exploited Children, Interpol, the National Center for Missing and Exploited Children, and many other organizations on child protection issues.⁷

THE COPPA RULE 10 YEARS LATER

In the past 10 years, the FTC's COPPA Rule has made important progress in raising awareness of children's online privacy issues. For example, many website operators now limit the amounts and types of personal information they collect from children online and provide parents and children with educational resources to foster conversations about online privacy and safety. Also, by encouraging website operators to be more transparent about the types of personal information that they collect from children online and about the use and disclosure of this information, the COPPA Rule has

⁷ See, e.g., <http://www.microsoft.com/protect/community.aspx>; Microsoft Corp., *PhotoDNA: Putting Microsoft Technology To Work Ensuring a Childhood for Every Child* (2009), <http://www.microsoftphotodna.com/>.

enabled parents to take a more active and informed role in deciding how their children can take advantage of the Internet's many benefits.

We appreciate the FTC's efforts to review its implementation of COPPA in light of changes in technology, and Microsoft looks forward to participating in this process. While we recognize that changes to the COPPA Rule may be warranted, we do not believe that a legislative amendment is necessary at this time. COPPA provides a flexible notice and consent framework for the collection, use and disclosure of children's personal information, and we believe the statute enables the FTC to update its Rule as technologies and children's use of new technologies evolve over time.

Today, I want to highlight two key aspects of the FTC's Rule that we believe the Commission should consider as it reviews its Rule in light of new technologies.

First, we hope that the Commission will provide clear guidance on how companies can better meet not only the letter, but also the spirit, of the law in light of changing technologies and the evolving ways in which children are consuming online services. As expected, website operators and online services have adopted different approaches to complying with the COPPA Rule.⁸ For example, Microsoft proactively requests age information and seeks parental consent for children's use of many of its services even when those services are not specifically targeted to children. We take this approach in order to encourage parental involvement in children's online activities and enable children to participate in and benefit from interactive activities online. Other companies take different approaches. While flexibility in implementing the requirements

⁸ Microsoft supports, for example, the FTC's approach of treating operators of general audience sites differently from operators whose sites are directed to children.

of COPPA is desirable given the diverse array of websites and online services available, new technologies challenge COPPA's goal of promoting opportunities for discussions between parents and children about the disclosure of personal information online. We encourage the Commission to use its COPPA Rule review process as an opportunity to help website operators and online services understand how they can honor the spirit of COPPA, especially in light of new technologies.

Second, we urge the Commission to work with technology companies and consumer advocates to develop more consumer-friendly, effective, and scalable methods for obtaining parental consent. The COPPA Rule generally requires that website operators and online services obtain verifiable parental consent before knowingly collecting, using, or disclosing children's personal information online.⁹ The FTC has appropriately adopted a "sliding scale" approach to parental consent. However, the FTC has only explicitly approved five parental consent methods for the disclosure of a child's personal information online: (1) providing a form for the parent to print, sign, and mail or fax back to the company; (2) requiring the parent to use a credit card in connection with a transaction; (3) maintaining a toll-free telephone number staffed by trained personnel for parents to call; (4) obtaining a digital certificate using public key technology; and (5) requiring an e-mail accompanied by a PIN or password obtained through one of the first four verification methods. These methods can be cumbersome for parents, do not scale for large organizations, and rely on children's self-reporting rather than an online age verification

⁹ 16 C.F.R. § 312.5.

system.¹⁰ These issues become more pronounced as children increasingly access online services through mobile devices, where providing notice and obtaining parental consent raises additional challenges.

For this reason, Microsoft recommends that the Commission expand its list of approved parental consent methods to include other reliable approaches that minimize burdens on parents, leverage existing technologies, and scale for millions of users. In addition, as more online services are made available on mobile phones and other mobile devices, the Commission should consider the types of parental consent mechanisms appropriate for these devices.

Microsoft recognizes that the task of improving the parental consent process is not easy and that there is no “silver bullet” solution. But the FTC’s ongoing COPPA Rule review provides a good opportunity to begin a productive dialogue on how to take advantage of existing services and new technologies to develop alternative parental consent methods.

For example, Microsoft and others in the industry have been working on new technologies for authentication and identity management generally, and these technologies could be used to help streamline and make more effective parental consent processes.¹¹ Digital identity cards are one of these technologies. They could be issued through existing

¹⁰ Children in the upper age range covered by COPPA may be sophisticated enough to provide false age information in order to access online sites and services that screen for age.

¹¹ See Microsoft Corp., *Digital Playgrounds: Creating Safer Online Environments for Children* (2008), <http://download.microsoft.com/download/2/8/4/284093f4-5058-4a32-bf13-c12e2320cd73/Digital%20Playground.pdf>; Scott Charney, Vice President Trustworthy Computing, Microsoft, “The Evolution of Online Identity,” 7 *IEEE SECURITY AND PRIVACY* 56–59 (2009).

offline processes where in-person identity verification of a parent-child relationship already occurs. Once a digital identity card has been issued, website operators and online service providers could obtain parental consent by requesting that parents and children provide their digital identity cards before accessing interactive services and features.

Microsoft appreciates that these stronger authentication and online identity technologies can themselves impact privacy. For this reason, we believe that these systems should work in tandem with technologies that enable users to limit the personal information they disclose. For instance, Microsoft is working on technology that relies on cryptographic protocols and tokens to enable parents and children to better manage their identities online in a privacy enhancing way. When combined with the use of digital identity cards, these technologies could allow parents and children to disclose only that information that is necessary (such as parental status or age, but not name or other personal information) to enable children's access to and use of websites and online services.¹²

These identity management technologies offer exciting prospects for creating a broader range of meaningful parental consent methods tailored to the use of children's information online. Microsoft looks forward to working in close collaboration with the public sector and other industry members to evaluate and implement these technology tools as part of a comprehensive approach to protecting children's privacy online.

¹² Microsoft Corp., *Microsoft U-Prove Technology Release: Open Standards and Community Technology Preview* (2010), <http://www.microsoft.com/mscorp/twc/endtoendtrust/vision/uprove.aspx>.

CONCLUSION

Thank you for the opportunity to testify today. We take our privacy obligations seriously, and we are committed to working in both the short and long term with Congress, the Commission and other stakeholders to address privacy challenges raised by new technologies.

ATTACHMENT



Family Safety

Helping to Protect Children in the Online World

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Introduction

For children, the Internet is both a classroom and a virtual playground—a place to learn, connect with friends and have fun. But as kids explore and interact online, they might encounter content their parents would not want them to see, or they might come into contact with people who pose a threat to them. Just as there are places and activities in the physical world that are unsafe or inappropriate for children, there are places and activities online that can pose a risk to children’s privacy and personal safety.

In the United States, 71 percent of teens with online access have a social networking profile.¹ Half of all British children aged 12 to 18 use instant messaging.² Among Australian children who use the Internet, 75 percent visit video-sharing Web sites and 95 percent play games online.³ In Brazil, 98 percent of children with online access download music.⁴ Children don’t always apply the common-sense personal boundaries and social mores of the offline world to their online experiences. In this context, today’s parents consider the Internet the greatest risk to their children among all types of media, according to one study.⁵

Parents and caregivers are in the best position to make decisions about what is appropriate for children and to talk to them about online safety. But they need help, particularly through tools and guidance. Microsoft has invested significantly in family safety online, incorporating family safety features into a broad range of Microsoft products and services that are available for consumer use. At the same time, we have made extensive efforts—often in collaboration with child development experts and non-profit partners—to provide guidance and education for teachers, parents and children. We also work with law enforcement, industry partners and governments to combat Internet crime and to strengthen legislation that protects children from online exploitation.

Making the Internet safer for children aligns with Microsoft’s overall commitment to increasing trust and safety online and to protecting consumer security and privacy. (See sidebar on page 2.) Our efforts to promote family safety in the digital world fall into three key areas:

- **Tools and technology.** Microsoft offers family safety settings and parental controls in Windows Vista®, Windows Live™, Xbox 360®, Xbox LIVE®, Zune® and other products and services. We are also an industry leader in developing interoperable technologies for identity management and tools that independent software vendors can use to extend the safety capabilities of the Windows Vista platform.

¹ Cox Communications Teen Internet Safety Survey, Wave II – in Partnership with the National Center for Missing & Exploited Children (NCMEC) and John Walsh, March 2007. http://www.cox.com/TakeCharge/includes/docs/survey_results_2007.ppt. A social networking profile is a user’s personal page on a social networking Web site. Profiles often include information about the person, photos, videos, personal blogs and contact information.

² “A European Research Project: The Appropriation of New Media by Youth.” Mediapro, 2006. <http://www.mediapro.org/publications/finalreport.pdf>.

³ “Norton Online Living Report. Symantec, 2008. http://www.symantec.com/content/en/us/home_homeoffice/media/pdf/nolr/080214_au_norton_online_living_report_nolr-final.pdf.

⁴ Ibid.

⁵ Common Sense Media Parents Study, Insight Research Group, May 19, 2006. <http://www.common sense media.org/news/CS-Parent-Study.PPT>.

- **Guidance and education.** Microsoft works with governments, nonprofits and community organizations to help parents and children better understand online risks and how to reduce them. These efforts range from informational Web sites and Internet safety curricula to public-information campaigns.
- **Law enforcement and public policy.** Microsoft works with law enforcement agencies and other partners to offer tools and training that aid law enforcement efforts to apprehend and prosecute criminals who use the Internet to harm children. We also support government efforts to craft and enact effective public policies that help protect Internet users and penalize online criminals.

Security and Privacy at Microsoft

Consumer security and safety are a top priority for Microsoft. Six years ago, the company launched its Trustworthy Computing Initiative, a companywide top-to-bottom commitment to delivering secure, private and reliable computing experiences for everyone. In addition to improved software development practices, Trustworthy Computing includes support for strong laws addressing criminal online conduct; support for law enforcement training, investigations, coordination and prosecutions; and guidance for customers on adopting security and privacy best practices.

Our corporate privacy policies—including a set of privacy principles released in 2007 related to search and online advertising—reflect our long-held commitment that consumers should have the ability to control the collection, use and disclosure of their personal information.⁶ This is nowhere more crucial than in the area of young people's Internet use. From social networking sites to e-mail to online gaming, responsible user practices and technology safeguards must be applied to help keep young Internet users—and their personal information—safe.

Technology

When it comes to children's safety online, there is no technological silver bullet that can substitute for parental involvement, supervision and guidance. But Microsoft is committed to developing tools and technologies that can help parents in this important task. Family safety tools and features have been built into a wide range of Microsoft products and services, including Windows Vista, Windows Live, Xbox 360, Xbox LIVE, Zune and Mediaroom™.⁷ These include tools that give parents greater control over what their children can access and how they can interact via the Web and elsewhere online—from Web content filtering and e-mail contact management to social networking restrictions.

Windows Vista

In all home editions of Windows Vista, Microsoft's next-generation client operating system, separate accounts can be created for each member of the family.⁸ And using the centralized **Parental Controls** panel, parents can specify when their children can use the computer, which Web sites they can visit and which software applications they can use. Parents can also restrict access to PC software games based on title, content or rating. They can even view detailed reports about a child's computer use to look for potentially inappropriate sites that the child might be visiting.

⁶ Details on Microsoft's privacy policies are available at <http://privacy.microsoft.com/>.

⁷ More information on these and other family safety technologies can be found at www.microsoft.com/protect.

⁸ The Starter, Home Basic, Home Premium and Ultimate editions.



Monitoring children's computer use not only helps parents keep track of what their kids are seeing, hearing and doing, but it enables them to refine and modify restrictions based on actual feedback and offers a basis for informed discussion with their kids about Internet use and online habits. The Parental Controls icon in the system tray is always visible to let children know that the Parental Controls feature is on.

For Web content filtering, parents can create customized settings that block sites by type of content (such as mature content, pornography or sex education) or specifically allow only certain sites. Parents can also enable a setting that prevents children from downloading software.



To restrict the amount of time kids spend using the computer, parents can use a simple point-and-click grid to indicate "blocked" and "allowed" days of the week and hours of the day. As the end of an approved time period approaches, the child receives a 15-minute and a 1-minute notification. If the allotted time ends before the child logs off, Windows Vista suspends the session and saves all of the child's work.

From the Windows Vista Parental Controls panel, users can also enable safety features

—such as content filters—that are built into third-party software and services.⁹ Microsoft also offers application programming interfaces (APIs) so third-party developers can build to the Windows Vista platform.

Windows Media Center

Windows Media Center in Windows Vista Home Premium and Ultimate editions is a feature that allows you to watch and record live TV on your computer. It includes Parental Controls that let parents restrict viewing of digital entertainment by industry ratings (including the Motion Picture Association of America). Parents can:

⁹ Windows Vista Parental Controls are configured to turn themselves off to prevent conflicts with third-party family safety applications.

- Set a maximum allowed rating for television and movie content (such as PG-13 or TV-14)
- Restrict access to unrated programming
- Block access to programming based on category: fantasy violence, suggestive dialogue, offensive language, sexual content or violence

Windows Live

Windows Live (<http://get.live.com>) is a set of free Web services and PC applications that help people stay better connected and get the most out of their Windows experience. It includes the Windows Live Hotmail e-mail client, social networking with Windows Live Spaces, instant messaging with Windows Live Messenger and other services.



A key offering of Windows Live is **Windows Live OneCare™ Family Safety**, a service that seamlessly integrates family safety options for Windows Live services. Family Safety offers adjustable content filtering, activity reports for each user in the family, and contact management features to help prevent children from interacting with unknown individuals. Parents can monitor online activity and update settings from any Internet-connected computer.

Family Safety also includes expert guidance for parents on age-appropriate settings. For certain markets, this guidance is country-specific. For example, the U.S. version of Family Safety includes guidance from the American Academy of Pediatrics; in Germany, the guidance is from Deutsches Kinderhilfswerk.

Family Safety can be used with Windows XP SP2 and later versions of the Windows® operating system, and it supports Windows Internet Explorer® 6 and later versions, as well as other browsers. Key elements of the service include:

- **Contact management.** Online contact with strangers is a significant concern for parents because of the potential for harassment, inappropriate online interaction and contact with predators. Parents can specify that their approval be required before their child can communicate with a new person using Windows Live services such as Windows Live Hotmail and Messenger or before a new person is allowed to see the child's social networking page or blog on Spaces. The contact-management settings apply even when a child logs on to Windows Live from a computer outside the home.
- **Content filtering.** Parents can specify unique filtering settings for each member of the family. These settings allow, block or display a warning for a range of content categories, which apply to all Web content viewing. Filtering guidance helps parents determine age-appropriate settings and online activities as well as how to talk to children about safe Web browsing practices.

In addition, abuse reporting is available throughout Windows Live and the MSN® network of Internet services so users can report inappropriate behavior or content.¹⁰

Other major Windows Live services also have their own specific safeguards and privacy tools. They allow users to do the following:

Live Search

- Filter search results for sexually explicit images and text

Windows Live Messenger

- Create a manually selected list of allowed instant messaging contacts
- Be notified whenever someone tries to add you to their Messenger Contacts list
- Block a person from contacting you or seeing if you are online

Windows Live Hotmail

- Set your personal account filters so Windows Live Hotmail will deliver mail only from people on your Contacts list and trusted senders
- Block all e-mail from a particular e-mail address
- Identify, based on color-coded alerts, whether an incoming message might be malicious or fraudulent

Windows Live Spaces

- Make your Windows Live Space completely private, available only to selected people, or public
- Access safety information from any Spaces page

Xbox 360 and Xbox LIVE

Xbox 360 and Xbox LIVE—Microsoft's gaming platform and online gaming environment, respectively—are designed to provide secure gaming and age-appropriate content for all users. The easy-to-use Family Settings console in Xbox 360 allows parents to set restrictions that apply to both offline and online play.

¹⁰ For example, there is a Report Abuse button at the bottom of every Windows Live Space so customers can easily report issues.



The console recognizes game and video rating systems from countries around the world, allowing parents to specify categories of games and movies their children can access.¹¹ It also has a Family Timer feature that parents can use to limit the duration of game play within each 24-hour period.

For Xbox LIVE, the console can be configured to allow online gaming and communication only with approved friends and to require parental approval for new friends. It also allows users to report inappropriate use of the service.

Specifically, the Xbox 360 Family Settings console allows parents to:

- Customize each child's playing environment
- Specify how much time a child can spend playing games each day or each week
- Specify which games a child can play, based on game rating
- Override parental restrictions on a case-by-case basis
- Create personal Xbox LIVE settings for a child that will apply to that account no matter what machine is used to access the account
- Require parental approval of each child's list of online friends
- Specify which types of online communication are allowed (i.e., text and voice, video)
- Limit exposure to content created by other members of the Xbox LIVE community
- Limit sharing of personal profile information to friends only, or block all sharing of personal profile information

Mediaroom

Microsoft Mediaroom, the latest version of Microsoft's Internet Protocol Television (IPTV) software platform, allows cable operators and telecommunication companies to deliver content and services such as standard and high-definition TV channels, digital video recordings and video on demand.

Mediaroom includes parental control features for managing children's access to channels, shows and services. Using a PIN or multiple PINs, parents can restrict:

- Access to programming by rating (with special functionality for blocking adult-rated programming)

¹¹ Systems for rating age-appropriateness of video and game content vary by country or by region. They include the Entertainment Software Rating Board (www.esrb.org) in the United States and Canada, the British Board of Film Classification (www.bbfc.co.uk) in the UK, the Game Rating Board (www.grb.or.kr) in Korea, Unterhaltungssoftware Selbstkontrolle (www.usk.de) in Germany, and Pan-European Game Information (www.pegi.info) in much of Europe.

- Access to unrated programming
- Access to individual channels
- The ability to purchase video-on-demand and other content

Zune

Parents can use Family Settings to restrict their children's access to and ability to purchase content from the Zune Marketplace online music store for use on their Zune portable media player. Specifically, parents can:

- Specify whether a child can make purchases from Zune Marketplace.
- Restrict a child's access to explicit content available through Zune Marketplace.
- Specify who can send messages to a child in the Zune Social online community. (Children 12 and under are prohibited from joining the community.)
- Specify whether a child can accept friend requests in the Zune Social online community.
- Specify whether a child can share favorite artists and songs with the Zune community.
- Specify who can see a child's friends list.

Guidance and Education

While Microsoft continues to create tools and technologies to help promote child safety on the Internet, we believe that educating parents and children is the most effective way to respond to online risks. To this end we support numerous family safety educational organizations and outreach efforts, including:

- **Ad Council's Internet Safety Coalition (ISC).** Microsoft is a member of the ISC, which is working to help kids understand that the Internet is a public place and to explain the risks of ill-considered Internet posting.
- **Bad Guy Patrol.** As part of Microsoft Canada's and the Government of Alberta Children's Services shared commitment to preventing child sexual exploitation, www.badguypatrol.ca teaches children ages 5 - 10 critical Internet safety skills through a series of games. A section for adults provides additional tips on how to keep kids safe and the program is being offered to other provinces across Canada.
- **GetNetWise.** Microsoft supports this public education organization and Web site (www.getnetwise.org), which offer Internet users resources for making informed decisions about safer Internet use.
- **Get Safe Online.** Microsoft is a founding sponsor, along with the UK government and other leading companies, of this campaign and Web site (www.getsafeonline.org) devoted to teaching consumers and businesses about Internet security and safety.
- **i-SAFE America's i-LEARN.** Microsoft is a sponsor of this free online curriculum for educators, parents, teens and law enforcement, which is available at www.ilearn.isafe.org.
- **National Cyber Security Alliance (NCSA).** Microsoft is part of this nonprofit public-private partnership that offers online safety and security information to the public on the www.staysafeonline.org Web site and through educational efforts such as National Cyber Security Awareness Month.

- **NCMEC Netsmartz.** Microsoft has provided video production resources for the National Center for Missing and Exploited Children's Netsmartz Web site (www.netsmartz.org), which helps educate parents, kids, teachers and law enforcement about online security and safety issues.
- **NetSafe.** NetSafe and Microsoft New Zealand developed this online safety site (www.hecctorsworld.com), which offers Internet safety curricula for teachers as well as a range of fun activities for children that teach them about safer Internet use.
- **OnGuard Online.** Microsoft helped develop the U.S. Federal Trade Commission's Web site at www.onguardonline.gov, which offers consumers tips, articles, videos and interactive activities related to online safety and security.
- **"Safety is no game. Is your family set?" Tour.** Microsoft, Boys & Girls Clubs of America and Best Buy cosponsored a 20-city campaign to promote safer and age-appropriate gaming and to teach kids and parents about the Xbox 360 family safety features.¹²
- **Staysafe.org.** Microsoft sponsors and finances a Web site at www.staysafe.org that offers guidance and news about online security and safety issues. In 2006, Microsoft joined with the Federal Trade Commission, AARP, U.S. Chamber of Commerce, Best Buy and other partners to sponsor Staysafe.org's Get Net Safe Tour of 12 U.S. cities to raise awareness about Internet security and safety.
- **Wired Safety.** Microsoft is helping to support Wired Safety's first international conference on cyberbullying, at which representatives from government, education, the media, the technology industry and others will help raise awareness of this important issue and spur appropriate action.

In addition to these partnerships, at our www.microsoft.com/protect/family website we offer our own broader information about consumer online safety in three key areas:

- **Family Safety** – With young people online in record numbers we provide families with guidance to help promote personal safety and privacy. Just as parents teach their children to look both ways before they cross the street, Microsoft is working to help parents engage with their children to apply similar safety rules to protect kids online.
- **Protect Your PC** – Helping users protect their PCs from threats like viruses and spyware is another key area of continued focus.
- **Protect Yourself** – ID Theft is a significant concern for consumers. Microsoft is actively addressing ways to help people better protect themselves when online.

Law Enforcement and Public Policy

Microsoft is committed to helping make the Internet safer for all users, especially children and families, but we can't do it alone. Partnerships with law enforcement agencies, governments, nonprofit organizations and other industry leaders are essential to combating cybercrime. Microsoft has also worked with governments to strengthen online safety and

¹² Educational materials from the campaign, including a parent-child gaming pact that families can fill out, are available at <http://www.xbox.com/en-US/support/familysettings/isyourfamilyset/default.htm>.

privacy laws and to develop mandatory Internet safety education programs in schools. These efforts address not only individual children's use of the Web but also broader criminal issues like online child pornography.

One highly successful effort is the **Child Exploitation Tracking System** (CETS), a system jointly developed by Microsoft and Canadian law enforcement to manage investigations of child exploitation cases. CETS allows investigators to import, organize, analyze and search large volumes of information while conducting investigations and share information across law enforcement agencies. To date, CETS has been deployed in Canada, Brazil, Chile, Indonesia, Australia, Italy, Romania and the United Kingdom.

In June 2006, Microsoft, AOL, Earthlink, United Online and Yahoo! announced a partnership with the **National Center for Missing and Exploited Children** (NCMEC) to fund a new **Technology Coalition** within NCMEC to develop and deploy technology solutions that disrupt the ability of online predators to exploit children or traffic in child pornography. The participating companies pledged US\$1 million in combined initial funding as well as technical support and expertise.

Microsoft has worked with **Interpol** and the **International Centre for Missing & Exploited Children** (ICMEC) to sponsor worldwide training sessions for law enforcement personnel on computer-facilitated crimes against children. As of February 2008, more than 2,600 law enforcement officers from more than 100 countries have been trained in methods of identifying suspects, investigating offenses and dealing with victims of online child predators.

In 2006, Microsoft joined ICMEC, NCMEC, leading financial institutions and Internet industry leaders to form the **Financial Coalition Against Child Pornography**, which provides a forum for members to collaborate on strategies to cut off funding for child pornographers and eradicate child pornography.

Microsoft works extensively with the U.S. Department of Justice's **Internet Crimes Against Children Task Force** and is a member of the **Virtual Global Taskforce**, a public-private partnership that combats online child abuse worldwide.

In 2008, Microsoft joined the **Internet Safety Technical Task Force**, a coalition of academics, industry, advocacy groups and others that examines issues related to Internet safety, online authentication and children's age verification.

Microsoft includes tools in its online services that can help detect and prevent child pornography and exploitation, and it is continually developing new tools both independently and in conjunction with its partners. MSN uses a filtering tool to review images uploaded to Windows Live Spaces and MSN Groups. Microsoft reports any images identified as apparent child pornography to NCMEC and closes the site. Microsoft also has a complaint center where users can report incidents of abuse on our sites.

Microsoft has worked with state attorneys general in Alabama, Colorado, Georgia, Kansas, Massachusetts, New Hampshire, New Mexico, South Carolina and Utah to provide comprehensive training for law enforcement on computer-facilitated crimes.¹³

In April 2006, Microsoft joined ICMEC in announcing ICMEC's model legislation on child pornography. This legislation seeks to modernize child pornography laws for the 184 member countries of Interpol; Microsoft has pledged to support efforts worldwide to develop and enforce these laws.

¹³ In the United States, the attorney general is the state government's chief legal advisor and law enforcement officer.

Microsoft has joined industry partners to encourage countries to adopt and ratify the Council of Europe Convention on Cybercrime, which requires signatories to adopt and update laws and procedures to address crime in the online environment.

Conclusion

Microsoft has long been committed to helping protect children online. We take a comprehensive approach to online safety that includes the development of family safety technologies, guidance and education for families and children, and partnerships with industry and law enforcement to combat online crime.

Online child safety is directly in line with Microsoft's overall commitment to promoting greater trust online and to offering products and services built with consumer safety in mind. Microsoft will continue to invest in programs, technologies and partnerships that advance the goals of safe computing for children and families.

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