Testimony of Ginny Wydler
Before the COPA Commission
At its Hearing on Filtering and Labeling
July 20, 2000

As Director of Network Standards and Policy for AOL I am responsible for a

broad variety of policy considerations aimed at ensuring consumers have a safe,

enjoyable experience with AOL's products and services. This includes

responsibility for our child safety and privacy protections (including Parental

Controls) and general advertising and content standards & practices.   AOL is

pleased to be represented on the COPA Commission and involved in its efforts

as we work toward our mutual goal of finding the most effective ways to protect

children online.

Our mission at America Online is to build a global medium as central to people's

lives as the telephone or television… and even more valuable. We want to build

a medium we can be proud of. America Online has played a significant role in

the development of the online medium and we have always shared a special

appreciation of its enormous power to benefit society - especially kids.

Learning how to explore and understand the online world is an essential skill for

our children in today's wired world, but we all agree that kids need and deserve

special protection in this new medium. That is why we at AOL have placed such

a strong focus on making our service and the online medium safe as well as

rewarding for children. By integrating cutting-edge technological tools, promoting

major public education campaigns, and closely cooperating with elected officials and government agencies, we have tried to offer strong proactive leadership in every area of children's safety online.

In some ways even more important than those efforts, however, has been our work to provide our member families with the resources and tools they need to make informed decisions.   No law, no technology, no corporate initiative can ever take the place of an educated and involved parent when it comes to their children's online safety.   That's why we've dedicated significant energy to providing AOL parents with the most useful information, content, tools and safety tips to help protect their children, as well as a list of the resources available for families both on AOL and the Internet.   By doing so, we've tried to empower parents so they can reinforce the rules of online safety, pay attention to what their kids are doing, and make use of technology such as our Parental Controls to protect their children from inappropriate content.

Industry Efforts to Educate the Public
We have always believed that the industry must lead efforts to give parents the tools they need to protect their children online. Equally important to offering parents choices online and great content for children is ensuring we continually educate consumers about Internet safety.   AOL has been an industry leader in organizing industry efforts to educate consumers about online safety and will continue this leadership.

Among those efforts, AOL was a leading corporate host of the America Links Up national public education campaign, designed to give parents information to help their children have a safe, educational and rewarding experience online

In addition, AOL created and distributed a special video for kids called Safe Surfin' that features online safety tips from some of the younger generation's favorite celebrities. It was developed in partnership with the National School Boards Association and has been introduced into schools across the country.

And AOL, in conjunction with the American Library Association, launched the Internet Driver's Ed program. This program is a traveling Internet education and safety class for children and parents, hosted in children's museums and other prominent venues in major cities nationwide.

AOL works closely with the National Center for Missing and Exploited Children (NCMEC) to support its mission of recovering missing children. Since July 1997, AOL, our subsidiary Digital City, and NCMEC have maintained an online program called "Kid Patrol" which helps locate abducted and missing children. AOL also helped to launch NCMEC's Cyber TipLine.

And AOL was a key partner in forming GetNetWise.org to provide consumers with comprehensive online safety information through links from both the AOL subscription service, AOL.com and Netscape.

Ongoing Education of our Members

We have found that education of our members is an ongoing process. As new consumers come online every day and as our existing customers' lives evolve, their parental controls needs may change as well. AOL members spend an average of 60 minutes online per usage day (Source: Media Metrix Digital Media Report, April 2000 Home/Work), so we have ample opportunity to remind parents about their choices, and about online safety. This is important not only for new members to our service, but for existing parents as well. We believe that every family should periodically review new information, check their child's Parental Controls settings and update them as appropriate for that child's age and maturity. Also important, we have worked to quickly and effectively notify our members of significant news and developments in the area of children's safety, like the Children's Online Privacy Protection Act or new Parental Controls offerings that may impact their family's online safety decisions.

We reach our members through several key vehicles online. Neighborhood Watch and Parental Controls are our central "online safety" information areas. These areas are always available online to our members through easy-to-find/navigate mechanisms including:

1. Keywords: We use logical "keywords" such as "child safety," "parental controls," "safety," "Note to Parents," and "help" to lead our members to online education areas about child safety and privacy. Online safety for kids is a topic in our AOL Help A-Z area. And we educate our newer members about keyword use early on, through Welcome Screen promotion of our Member Benefits Area.

2. Prominent Placement: Parental Controls is an icon on the Welcome Screen of our service which each member passes through each and every time they sign online. Additionally, Parental Controls are integrated into our Create A Screen Name process.

In addition, our service provides the opportunity for frequent updates through:

3. Kids Only & Teens Channels Reminders: Both our Kids Only channel, targeted to children 12 and under, and our Teens channel, targeted to younger teens 13 to 15, have online safety tips integrated into the experience. In fact, kids and teens must pass through these safety reminders before entering interactive chat and message board areas.

4. Steve Case Community Updates: These updates, which receive prominent, ongoing promotion on AOL's Welcome Screen, frequently focus on child safety.   April's letter, outlined child privacy protections, reminded parents to create separate screen names for each child and highlighted additional online resources for more information and help.

5. Parental Controls promotions. Parental Controls are promoted frequently through high trafficked areas including our new "Member Benefits" area, member orientation online and banner rotation in the "Read E-Mail" form.   In one such recent promotional campaign on our service, Parental Controls banners received an average of over 42 million ad impressions each month.

Engaging Content for Children

An essential part of AOL's commitment to families is to provide great content for children. Providing entertaining and educational experiences for kids has always been an important mission for America Online. The AOL Service reaches over 2 million children ages 2-11 (Source: Media Metrics, May 2000). For over 7 years now, AOL's Kids Only channel has been delivering fun, engaging and educational programming to children 12 and under. The channel receives accolades from the kids (and their parents) who visit and engage in it in ever increasing droves.

AOL holds itself and its content partners to the highest standards to deliver a safe, rewarding experience for children. To do so, we developed and codified strong institutional protections into AOL Kids Policies and AOL Teens Policies to which each of our partners must adhere. These policies, in addition to outlining privacy protections that must be in place for each audience, also outline baseline content standards for each area.   Each of our content partner sites is reviewed by our third party web filtering company, The Learning Company, for addition to the "white list" of sites as age appropriate for Kids Only screen names and/or Young Teens. Additionally, each partner in our Kids Only channel must fully monitor chat and message board areas to ensure they remain age appropriate.

AOL's Parental Controls

AOL's Parental Controls are the foundation of our child protection package and a key offering of our service. While providing kids with entertaining and educational experiences has always been an important mission for America Online, we strongly feel that it is also our responsibility to help parents manage their child's online experiences. AOL's Parental Controls put the power in the hands of parents, enabling them to make informed decisions about their kids' online activities by selecting the appropriate level of participation for each child. Parents also have the ability to customize additional features - such as chat, email, and Internet access - based on their children's online savvy and maturity.

Parents love the fact that AOL's Parental Controls are so easy to use.   In fact,

our members ranked Parental Controls among the top 8 features of our service.

And children love having their own personal screen name and the special content

developed just for them.

AOL's Parental Controls are a server-based technology. This delivery

mechanism allows us to provide the most secure experience to our users

because the Parental Controls settings are actually attached to the child's

individual screen name. No matter where that child signs online -- from home,

school or a friend's house, the Parental Controls follow.

In 1998, we changed our registration process to require parents to set Parental

Controls for each screen name upon registration. When we integrated Parental

Controls into the Create A Screen Name process; we saw a dramatic increase in

adoption as a result. There are up to 7 screen names available on one AOL

account, enabling even larger families to give each child in the household his or

her own screen name with customized Parental Control settings. Only "Master"

screen names controlled by the parents can create a new screen name or set or

change Parental Control settings.

When creating a separate screen name for their child, a parent is given the

opportunity to choose one of three different standard age "category" settings:

Kids Only, Young Teens, or Mature Teens. (They also have the option of classifying the account as General Access, which has no Parental Controls).

A Kids Only setting (recommended for 12 and under) restricts children to the Kids Only channel, which has been specially created and programmed for children 12 and under. The child also receives a customized Welcome Screen. A child using a Kids Only screen name can access age-appropriate content on AOL and the Web and interact with others online through e-mail and in special supervised kids' message boards and chat areas, but is blocked from taking part in general audience chat rooms and message boards, sending or receiving Instant Messages and visiting any web site that has not been reviewed and approved as age-appropriate.

A Young Teen (recommended for ages 13 – 15) category provides more freedom than a Kids Only screen name, but does not provide full access to more mature content and interactive features. Young Teen screen names can access most AOL content, and can visit Web sites that have been reviewed and approved as age appropriate. They may communicate with others online through e-mail and in a range of message board and chat areas. They are restricted, however, from accessing news groups, visiting inappropriate web sites, exchanging Instant Messages or taking part in private chat rooms. A Mature Teen (recommended for ages 16-17) setting allows older teens the most freedom of any of the Parental Controls categories. Mature Teen screen names can access all content on AOL

and the Web except sites that have been classified for an adult (18 plus)

audience. They can locate others and communicate online through Instant

Messaging, all chat areas, e-mail, private messaging and AOL's Member

Directory.Each of these category settings has a pre-selected set of "defaults" for

different features such as chat, e-mail, Instant Messages and Internet access. A

parent can choose to customize any of these defaults within a category to ensure

the experience best matches his or her child -- so even on a Kids Only account

(our most restrictive), a parent may choose to further limit access to e-mail to an

"approved" list, or, alternately, may decide that the child is mature enough to

participate in Instant Message conversations. Because each account is tied to a

specific screen name, we can ensure that no child with Parental Controls is

allowed to access a particular content area or participate in a chat until the

Parental Controls information for that account has been checked against our

database. When a child types in a website address or clicks on a web link, AOL

checks the Parental Controls information attached to the screen name, and

based on the category, makes sure that the site is on the approved list before

allowing it to appear.

We created separate categories for kids and for teens because we understand

that maturity levels vary widely at these ages. We offer two teens settings to

accommodate our members' interest in differentiating a 13–year-old's online

experience from that of a 16 to 17-year-old.

After selecting a Parental Controls category for their child's screen name, a

parent may further customize or modify their child's activities through Custom

Controls. A parent may choose to modify their child's access to content (Web,

newsgroups, file downloads) or way to communicate with others online (email,

Instant messages, chat). For example, if you have a ten-year-old child who you

want to only allow to exchange email with a list of specific friends and relatives,

you can customize Parental Controls to only allow e-mail access to people on

that list.

While there has been much focus on protecting children from email, another

Internet function that raises special concerns for children is instant messaging.

While instant messaging is wildly popular with children who create their own

online communities of friends, there are unique issues raised by this feature

which allows people to chat in real time. On the AOL service, IMs are default

"off" for Kids Only and Young Teens screen names because we want parents to

understand and consciously decide that this one-to-one communication is

appropriate for their child.

Evolution of AOL's Parental Controls

Parental Controls have been integrated into the AOL service nearly since its

inception. Our Parental Controls have always, and will always, continue to

evolve in response to consumer demand. Our early feature set focused on

"products" -- allowing consumers to fine-tune their child's experience by selecting

essentially "on or off" functionality for a variety of features including chat, newsgroups and e-mail. We developed the "Kids Only" category setting in 1995, recognizing the increasing popularity of our children's content, and the increasing number of families getting online. As the online medium became more mainstream, we focused on simplifying our Parental Controls. In 1997, we added our two "teens" categories, for parents who wanted a "one button" solution to setting controls. Even so, we continued to offer fully customizable selections for those parents who wanted to customize their child's experience. This "category" approach has proven very successful and popular with our millions of families with children.

We continue to evolve our Parental Controls to meet consumer needs for safe, easy to use tools. In response to consumer request, we recently introduced our latest feature, the Online Timer, in Spring of this year. This feature allows parents to determine how long and when their children can be online, and was among our most highly requested features.

In addition, we recently introduced a Teen Search product that enables an age appropriate search experience for teens, available through our Teens channel, or kw: Teen Search. We are working with a broad number of organizations including the American Library Association, and GLAAD to ensure that a diversity of voices and views are taken into account as this product is developed.

We will continue to enhance our web controls by working closely with our partners to ensure the broadest range of age acceptable sites are accessible to children and teens, and to minimize the possibility that inappropriate content will get through.

Our Process to Resolve User Complaints with Parental Controls

No system is perfect, so we encourage our members to continually provide input to make our Parental Controls better. Consumers have direct input to request that a site or sites be reviewed for addition to or deletion from a particular category of access. This functionality is available at kw: Web Request and also available at kw: Parental Controls. We receive over 400 requests per week through this mechanism. Through our members' valuable input and suggestions, the Learning Company can better evaluate what places are age-appropriate for each group. However, we also recognize that what one parent may find objectionable another may find perfectly acceptable, and that's why we offer varying levels of web controls.

One commonly heard criticism of filtering is that the technology can often overfilter. We do hear from our members that the smaller sites sometimes are not accessible to their children on Kids Only and Young Teen (or "approved list") settings -- for example "Johnny's school soccer site" might not be available. By encouraging our members to submit those smaller sites through the Request a

Site mechanism, we try to ensure that as many web sites as possible have been reviewed and approved.

Games Rating

One area where we have chosen to rate is on our Games Channel. Last fall, as part of our commitment to provide parents with information they need to guide their child's online experience, AOL endorsed the Entertainment Software Rating Board (ESRB) rating system for online games. All AOL games carry an ESRB rating, and we are working with the ESRB to develop a task force to garner support for and address challenges with online game ratings and to address the particular challenges of online environment.

International Implications of Child Online Safety

The ability to seek out information and resources across international borders is one of the benefits of this medium for our children, and we want to ensure that parents around the world have the ability as our U.S. members to guide their children's online experience. That's why AOL has always integrated our Parental Controls technology into each our International services, which now number fifteen.

What has been most interesting to us as we have taken our Parental Controls "international" in launching local versions of the AOL service in other countries is that a one size fits all approach to child safety does not work. While every

country shares the common goal of protecting children from inappropriate content, each country also has unique standards regarding what parents believe is inappropriate for children. Despite those valid national differences, we are concerned about the increasing efforts by some countries to enact restrictive local laws on Internet content. If this trend continues, we run the risk of creating an unworkable crazy quilt of global regulation that will hinder the growth of the medium and undercut our common goal of protecting children. Of course, all of these issues will only intensify and become even more important as global Internet usage grows.

Conclusion

To briefly summarize, AOL's commitment to families and child safety includes three key elements: educating consumers about online child safety, including our collaborative efforts with other companies in the industry; providing great age-appropriate content for young audiences; and offering parents easy to use, flexible tools to customize their children's online experience.

We are constantly enhancing our offerings to families and work closely with others in the industry to fine-tune our technological tools so that they are the most up to date and effective. Filtering, rating and labeling technologies are essential parts of the toolkit that can be used to protect children on the Internet.

Finally, it bears repeating that there is no substitute for parental involvement online. Raising consumer awareness about parental controls, choices and child online safety is a collaborative effort.   AOL believes that the industry and we have made great strides in this arena and are on the right path to continue doing so.