To the Esteemed Members of the COPA Commission:

I would like to re-introduce myself as Andrew Edmond, CEO and President of Flying Crocodile Incorporated, and thank you for this extended opportunity to present my ideas on how we can work to make the Internet a safer place for children.

As we are here to present solutions, I would like to first, present the current conditions. It is paramount to understanding the way that we do business, to comprehend our marketing strategies. Let me say this plainly, we do not now nor ever market adult content to children. In fact, we do not market to the public as a whole or blanket Online users, rather, we specifically target those who seek and use our resources. Our premier product, SexTracker, utilizes statistical analysis to target an established demographic, and various market segments therof, so that we can optimize our value to our webmaster clients, surfing consumers and advertisers.

Perhaps the largest contributor to the Adult Online Industry's success is our ability to work laterally; to achieve marketing goals through advertising and streamlining traffic from other adult websites. Where mainstream competitors would not compete on their websites: Burger King would not advertise on McDonalds' website, eToys would not advertise on Toys R' Us, and Compaq would not advertise on Dell, we work with other members of the Industry such that the bottom line is an Industry bottom line, and benefits several. Cross-promotion is a popular marketing mechanism for the Adult Industry.

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Surfers have the ability to locate us, and any other resource on the Web, through search engines, using keywords to select sites of interest. Adult Online sites register with search engines that range from global engines to demographic or trade specific engines. In order to assist surfers in locating sought after sites, Adult Online companies join site lists that sort content by user interests to provide surfers the ability to access site groupings of their choice. The SexTracker website is an example of this model, working with webmasters, advertisers, and surfers to make the Adult Web navigable. This adult targeted marketing is of the pull model, whereby surfers seek and request content, not of the push model that markets adult material to non-active seekers and baits children.

Another of these push models used by unethical business, adult and non-adult, is unsolicited communication, know to us all as "spam." It does not focus, target, or allow surfers to surf. Spam, instead, scatters messages across the Web to as many users as the businesses behind them can get e-mail addresses of, including minors. Let me, again, introduce you to iQcheck. iQcheck allows users to report spam, just as it polices our hub for illegal content. We report spammers to the authorities and do not practice our ethical business with these non-ethical entities.

Luring, baiting, and trapping minors is not in our interest. It is unethical to market to underage consumers. Minors do not add to our bottom line, they do not purchase our adult services or use our products. In fact, it is costly to us when minors use our resources, such as bandwidth, and we receive no economic return. Consistency, dedication, and policies which we can all stand by, implementing programs like that of BayTSP, widening the spread of iQcheck use to extend to other Adult Online portals, and strengthening of systems already in place, like Age Verification, will make the Internet a place where we can co-exist in a manner that protects our children and use the Internet for the common purpose of resourcefulness. Thank you.

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