

MEDIA DEVELOPMENT AUTHORITY OF SINGAPORE

**CLOSING NOTE TO PUBLIC CONSULTATION ON
PROPOSED REGULATORY OPTIONS TO
FACILITATE THE ADOPTION OF INTERNET PARENTAL CONTROLS**

14 July 2015

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PART I: INTRODUCTION

- 1.1 Today, Internet Access Service Providers ("IASPs")¹ are required under the Class Licence to inform and offer optional Internet filtering services to their subscribers at the point of subscription or renewal of their residential fixed-line and mobile Internet access subscriptions. The Class Licence also requires IASPs to provide reasonable technical support to their subscribers for the duration of their subscriptions. The intent of these requirements is to increase parents' awareness of the availability of Internet filtering services and to make it easier for them to subscribe to such services, in particular for parents with children aged 16 years and below.
- 1.2 The Media Development Authority ("MDA") has observed that parents' awareness of Internet parental controls² remains low. Drawing from more proactive approaches by foreign Governments or businesses to facilitate the use of such parental controls, the MDA consulted the public on proposed enhancements to the provision of Internet parental controls by IASPs under the Class License. The public consultation was held from 21 April 2014 to 16 May 2014, and covered the following proposals:
- a. **Subscription process for Internet parental controls to facilitate adoption.** IASPs to obtain consumers' explicit decision on whether they want Internet parental controls (i.e. Required Decision) at the point of subscription or renewal of fixed-line and mobile Internet access;
 - b. **Content categories filtered by default.** IASPs to filter "adult content" by default when Internet parental controls are switched on, with additional content categories left to the discretion of parents;
 - c. **Mode by which the content is filtered.** IASPs to provide network level Internet parental controls, with device level Internet parental controls left to the IASPs' own commercial considerations on whether to offer consumers an alternative;
 - d. **Subscription cost to consumers.** IASPs to offer to consumers at least a version of Internet parental controls free of charge with the subscription of any Internet access package; and
 - e. **Provision of technical assistance to consumers.** IASPs to complete the switch on of Internet parental controls for new/ re-contracting subscribers at the point of sale, and facilitate the switch on of the Internet parental controls for existing subscribers.

¹ An Internet Access Service Provider ("IASP") is a person or an organisation who supplies users with access to the Internet, sometimes at a cost. Some examples of local IASPs would include SingNet Pte Ltd ("SingNet"), StarHub Internet Pte Ltd ("StarHub"), M1 Ltd ("M1"), MyRepublic Pte Ltd ("MyRepublic"), etc.

² As Internet filtering solutions are increasingly referred to as Internet parental controls, MDA will hereafter use the term "Internet parental controls" in this closing note.

- 1.3 At the close of the public consultation, MDA received a total of 20 written responses. They included submissions from three IASPs ("IASP respondents"), four security solution providers ("security solution respondents"), three social interest groups ("social group respondents"), the Media Literacy Council ("MLC") and nine individuals ("individual respondents"). MDA also took into consideration the views raised through seven focus group sessions, which involved a total of 61 participants of various profiles, including parents, general public, and youth social workers. Please refer to **Annex A** for the list of parties who submitted responses and general profile of the focus groups, and **Annex B** for the full text of submissions and focus group discussions.
- 1.4 Following the initial review of the submissions to the consultation, MDA met with individual IASPs to discuss the implementation considerations with regard to the proposals (the "Consultation Meetings"). Due to IASPs' feedback on certain implementation issues, MDA commissioned a telephone poll to obtain further insights on parents' views towards specific parameters of the proposals. The poll took place from 22 December 2014 to 14 January 2015 and covered 513 respondents, all of whom were parents with children aged 16 and below.
- 1.5 MDA would like to thank all respondents for their feedback and comments. Part II of this closing note gives an overview of the comments received, and MDA's responses to the comments. Part III of this closing note sets out the conclusion and summary of MDA's final positions to the public consultation.

PART II: OVERVIEW OF COMMENTS RECEIVED AND MDA'S RESPONSES

2.1 Overview

2.1.1 The submissions and feedback received covered the five areas consulted, namely:

- a. Subscription process for Internet parental controls to facilitate adoption;
- b. Content categories filtered by default when the controls are switched on;
- c. Mode by which the content is filtered;
- d. Subscription cost to consumers; and
- e. Provision of technical assistance to consumers.

This paper will first cover the key comments (supplemented with poll findings where relevant) and MDA's final position on each of these areas.

2.2 Subscription Process to Facilitate Adoption

2.2.1 Most security solution respondents, a social group respondent, an individual respondent, and the majority of parents and the general public participating in the focus groups supported Required Decision. They viewed it as a balanced approach when combined with public education. Further, the subscription process would naturally increase parents' awareness and knowledge of the controls. To the parents, it would be a straightforward and convenient process that also accorded them flexibility of choice.

2.2.2 The MLC, two social group respondents, the majority of individual respondents, and the youth social workers and some parents participating in the focus groups supported Opt-Out. They viewed the process as being the most seamless. It also offered the basic level of controls to the less savvy parents, who may otherwise be indifferent. Some parents also highlighted that this process would address the lack of product knowledge by customer service officers, and that the option to opt-out of such a service would continue to be available.

2.2.3 All three IASP respondents supported Option 1: Inform & Offer³, i.e. to maintain at status quo. The IASPs felt that there was little evidence to conclude that the current regime was ineffective, as adoption figures for Internet parental controls were encouraging. They also highlighted that the processes involved under the other two options – Option 1A: Required Decision⁴ and Option 2: Opt-Out⁵, would "inevitably

³ Under **Option 1: Inform & Offer**, IASPs will inform and offer consumers optional Internet parental controls at the point of subscription or renewal for fixed-line and mobile Internet access.

⁴ Under **Option 1A: Required Decision**, IASPs will have to obtain consumers' explicit decision on whether they want Internet parental controls at subscription or renewal.

⁵ Under **Option 2: Opt-Out**, IASPs will switch on Internet parental controls by default at subscription or renewal, unless instructed otherwise by consumers.

slow down the processing of customers, and create delays and customer frustration". In particular, one IASP respondent indicated that adopting Required Decision would require them to make significant system changes and incur substantial costs. One IASP objected to Opt-Out, stating that the provision of a default Internet parental control service would conflict with prevailing legislation and regulations which seek to ensure that consumers are not charged for services that they had not consented to (i.e. unsolicited services)⁶. A few individual respondents also objected to Opt-Out on grounds that some parents may take the default option (i.e. Opt-Out) without fully understanding the implications and exercising choice.

- 2.2.4 During the Consultation Meetings, one IASP suggested that if the Required Decision subscription process were adopted, IASPs should be allowed some flexibility to obtain consumers' explicit decision on whether they want Internet parental controls after the point of subscription or renewal of Internet access. This would provide consumers with more time to make a decision. The same IASP also asked for MDA's clarification on the IASPs' obligations where the consumer did not respond to their request for decision. Findings from the poll showed that of the 90% who wanted to be informed of the Internet parental controls offered by IASPs, 75% preferred to separate the information and subscription process from the Internet access contracting process, while 20% preferred to consider subscribing to Internet filters as part of the Internet access contracting process.

MDA's Response

- 2.2.5 *MDA notes the strong support from parents, youth social workers and the general public for either Required Decision or Opt-Out, which indicated the need for the existing Inform & Offer regime to be enhanced. Between Required Decision and Opt-Out, MDA feels that Required Decision offers the better balance in that it raises parents' awareness of Internet parental controls, while ensuring that they have made considered decisions with regard to guiding their children's use of the Internet. MDA also notes that Required Decision was the preferred option for most parents. Conversely, with Opt-Out, parents may naturally go with the default option without first exercising choice and there could also be lost opportunities to raise the awareness of Internet parental controls at the point of contracting.*
- 2.2.6 *While MDA had earlier proposed for Required Decision to be at the point of subscription or renewal of the Internet access, findings from the poll indicated that parents generally prefer to have some time to decide whether to subscribe to Internet parental controls. MDA will therefore refine the proposal such that IASPs can **obtain their consumers' explicit decision on whether they want to sign up for Internet parental controls either at the point of subscription or renewal for Internet access, or within 14 days from the point of contracting.** In this regard, IASPs should consider what would be the most effective means to inform parents of their filtering*

⁶ Specific reference was made to the Consumer Protection Act (Fair Trading) (Opt-Out Regulations 2009), IDA's Telecom Competition Code and MDA's Media Market Conduct Code. In summary, these regulations seek to ensure that no consumers are charged for services that they did not consent to (i.e. unsolicited services).

services and accordingly obtain their decision with regard to subscribing to these services.

2.2.7 MDA noted the IASPs' concern that some consumers may not respond to their requests for decision. MDA will thus regard IASPs as having met the requirements of the Required Decision subscription process if they had sent at least one follow-up reminder to their subscribers to seek their decision on whether to subscribe to Internet parental controls. In such instances where subscribers choose not to respond to their IASP's reminder, they are considered as having decided not to subscribe to the filtering services. This also recognises that parents are ultimately responsible for taking the necessary actions to protect their children online, and the role of both MDA and the IASPs is to facilitate the process through offering consumers choice.

2.2.8 MDA would emphasise that for the purpose of ensuring compliance, IASPs will have to retain records of (i) having actively informed individual subscribers on the availability of Internet parental controls, with clear and simple options for parents to respond with their decision (for e.g. evidence of information containing the option whether to subscribe or not subscribe to Internet parental controls, sent to individual subscribers via electronic or non-electronic means), and (ii) the decisions of individual subscribers to facilitate compliance checks, or where applicable, the follow-up reminders sent to individual subscribers.

2.2.9 MDA will not be adopting Opt-Out. MDA would also clarify that the Opt-Out subscription process does not conflict with prevailing legislation and regulations, the latter of which seeks to ensure that consumers are not charged for services that they did not consent to (i.e. unsolicited services). The Opt-Out subscription process proposed that subscribers receive a base version of Internet parental controls free-of-charge. As such, it would not have conflicted with the prevailing legislation and regulations.

2.3 Content Categories Filtered by Default when the Controls are Switched On

2.3.1 The MLC, the majority of the individual respondents, the large majority of the focus group participants, all social group respondents and some security solution respondents, supported filtering "adult content" by default when the controls are switched on. They highlighted that specifying "adult content" to be filtered by default offered children a baseline protection. In fact, the majority of the focus group participants, especially the parents, highlighted that this proposed baseline was insufficient and suggested for the default list to be extended beyond "adult content" to include other categories, namely "violence", "gore" and "addiction (gaming and gambling)". At the same time, some parents also pointed out the need to clarify what constitutes "adult content".

2.3.2 On the other hand, all three IASP respondents and a few focus group participants disagreed with MDA's proposal to specify "adult content" to be filtered by default when Internet parental controls are switched on. They commented that parents

should be allowed the flexibility to decide on the appropriateness of their child's online media consumption. IASPs also highlighted that filtering solutions may sometimes inadvertently block educational or informative content needed for students' research and that there was no rationale to limit only "adult content" to be filtered by default when the controls are switched on, given the presence of other categories of harmful content online. The IASPs were also of the view that they should be allowed to determine the features and functionality of the Internet parental controls offered given the commercial considerations involved.

- 2.3.3 During the Consultation Meetings, two IASPs had additionally suggested that MDA should provide the list of websites to be filtered, as opposed to only specifying categories, so as to minimise confusion amongst the IASPs and subscribers of the Internet parental controls.

MDA's Response

- 2.3.4 *MDA notes the strong support from the focus group participants, individual respondents, social group respondents and the MLC for certain content of concern to be filtered by default once the Internet parental controls are switched on. In this regard, MDA will therefore include **content containing sexually explicit material, violence and gore to be filtered by default** for consumers who choose to subscribe to Internet parental controls. The term "adult content" is replaced with "sexually explicit material", with the latter being clearer in scope and aligned to the content categories commonly seen for filters. The inclusion of "violence" and "gore" as additional categories in the default list is in consideration that they were consistently mentioned in the focus groups and written responses from individuals. MDA will require the IASPs to provide Internet parental controls with filtering capabilities that are not limited to only these two categories of content. This will allow parents the option to select more categories should they wish to.*
- 2.3.5 *While "addiction (gaming and gambling)" was also mentioned, MDA will not include it in the default list as addiction is driven not only by the type of content accessed, but also by the level of usage, and the extent of emotions attached during those instances of usage, which vary across individuals. Specific to gaming, MDA views that parents may want the option to allow gaming for children as long as there is proper time management and parental guidance, and hence it may be better to include this in the optional rather than the default list. With respect to gambling, Parliament has passed the Remote Gambling Bill on 7 October 2014, which provides the legislative framework to regulate remote gambling activities in Singapore, including those on the Internet.*
- 2.3.6 *On the IASPs' suggestion for MDA to provide them with the list of websites to be filtered, MDA notes that IASPs currently partner with third-party software vendors who provide and update the list of websites under each category of content filtered. Additionally, IASPs typically maintain feedback mechanisms such that customers' feedback on specific websites could be channelled to their software vendors. Hence,*

MDA views that there is no necessity for the regulation to be prescriptive in specifying the websites to be filtered under each content category.

2.4 Mode by which the Content is Filtered

- 2.4.1 The views were divided with regard to the mode by which content should be filtered, i.e. whether at the network level⁷ or device level⁸. This division of views occurred even within the same respondent or participant profile group (for e.g. IASP respondents, security solution respondents, social group respondents, parent participants and general public participants in focus groups).
- 2.4.2 For those who supported network level controls⁹, they felt that the network level controls offer a convenient and hassle-free approach for less-technologically savvy parents, and alleviate installation challenges associated with the ownership of multiple mobile devices among children. Some security solution respondents also commented that with technological advancements, the deployment of filtering solutions at the network level has minimal impact on network speeds, which had been a concern of IASPs in past industry consultations.
- 2.4.3 On the other hand, there was also some support for device level Internet parental controls¹⁰. The key reason submitted was that the protection offered at the network level was not seamless in and out of the home environment. In contrast, these respondents viewed that 'localised protection' at the device level would resolve the issue and address the challenge of prevalent use of mobile devices among children and their keen attachment to them.
- 2.4.4 There were yet other suggestions including (i) requiring IASPs to offer both network and device level controls, given the different advantages of both approaches; (ii) leaving the features and functionality of the controls entirely to the discretion of the IASPs to avoid stifling innovation (suggested by one IASP respondent); (iii) putting in

⁷ Content is filtered as long as the Internet connection is via the network or gateway provided by the particular IASP that the consumer is subscribed to. There is typically no need for any installation of applications or software onto the end-user devices. To illustrate, if a household subscribes to network level Internet parental controls for both their home and mobile broadband Internet plans, all devices with Internet access capabilities will have filtered content if Internet access is via the subscribed networks. However, if the device taps on another network such as a public wifi network, the content will no longer be filtered.

⁸ Content is filtered through Internet parental controls installed on end-user devices. The controls will need to be installed once on each device. However once the controls are installed, content will always be filtered so long as Internet access is via the particular device. To illustrate, if a consumer installed Internet parental controls on a mobile phone, the content accessed via the mobile phone will always be filtered, even if the access is via another network beyond the home environment such as a public wifi network. Should the consumer change to a new device, Internet parental controls will have to be installed on the new device to continue filtering content.

⁹ Those who supported network level Internet parental controls include: One IASP respondent, two security solution respondents, a social group respondent, the MLC, an individual respondent, and some parents and youth social workers from the focus groups.

¹⁰ Those who supported device level Internet parental controls include: One IASP respondent, an individual respondent, and some general public and youth social workers from the focus groups.

place a centralised nationwide filter; and (iv) extending the filtering solutions to public Wi-Fi. For those who suggested (iii) and (iv), the reasons were centred on the desire to have a more complete solution in place and one that would require a higher level of technological knowledge and skills to bypass.

MDA's Response

- 2.4.5 *After considering the various comments, MDA will require IASPs to provide **network level Internet parental controls**. IASPs can choose whether to provide device level parental controls. MDA believes that network level parental controls would be the simplest option for less-technologically savvy parents and would alleviate installation challenges associated with the use of multiple mobile devices in a household. The proliferation of connected devices and their pervasiveness in homes today has made the access of Internet content widely available on many appliances at home (for e.g. Connected TVs, tablets, TV game consoles, smart media players). MDA considers that network level controls would help to limit exposure of children to harmful content, regardless of the device used at home.*
- 2.4.6 *MDA also notes from its Zero-to-Fourteen Media Consumer Survey 2014¹¹ that children under age 14 predominantly access the Internet at home¹². Of those who access the Internet on-the-go, the majority did so through post-paid mobile broadband networks¹³. Hence network level Internet parental controls would be adequate as a baseline protection for the young. MDA will reiterate that its intent is to ensure that children are accorded baseline protection via the convenient deployment of Internet parental controls when they access the Internet. The controls are not intended as a complete and fool-proof solution. On this note, MDA will therefore not consider a centralised nationwide filter. MDA will however continue to focus on public education efforts via the MLC.*
- 2.4.7 *With regard to extending the filtering solutions to public Wi-Fi, MDA notes parents' concerns over the increasing coverage and accessibility to public Wi-Fi. MDA also observes that the United Kingdom has since implemented a baseline filter to their public Wi-Fi to protect children against certain harmful and objectionable content¹⁴. While MDA is in-principle supportive of extending the baseline filter to wireless@sg, there is a need to further discuss the implementation feasibility and approach with the wireless@sg operators.*

¹¹ The Zero-to-Fourteen Media Consumer Survey had a sample size of 1,200 respondents (Singapore Citizens and PRs) and was representative of the local resident population aged 0 to 14 years old, of which 921 respondents had ever accessed the Internet. Surveys were collected face to face, with the parents of children aged 0 to 6 completing the survey on their behalf.

¹² Of the 921 respondents aged zero to fourteen who had ever accessed the Internet for media and non-media activities, 98% accessed the Internet at home, of which 70% accessed the Internet at least 4-6 days a week.

¹³ Of the 921 respondents aged zero to fourteen who had ever accessed the Internet for media and non-media activities, 35% access Internet-on-the-go, of which 65% accessed the Internet through post-paid mobile broadband networks, and 50% accessed the Internet at least 4-6 times a week.

¹⁴ "PM holds Internet safety summit", 18 November 2013, Prime Minister's Office, <https://www.gov.uk/government/news/pm-hosts-internet-safety-summit>.

2.5 Subscription Cost to Consumers

- 2.5.1 All three IASP respondents disagreed with MDA's proposal to offer at least a version of Internet parental controls free-of-charge with the subscription of any Internet access package. They commented that the controls should be chargeable as they were value-added services and significant cost was involved in providing such services. The IASPs also highlighted that the cost should rightfully be borne by consumers who want the service so that it would not be passed on to all consumers across the board. One IASP also indicated that there are free parental controls and filtering solutions available online which consumers already have access to and can self-help.
- 2.5.2 During the Consultation Meetings, two IASPs had additionally mentioned that the availability of free Internet parental controls may cannibalise the 'paid' version that comes with comprehensive functionality, causing them to stop offering the latter entirely. They added that free Internet parental controls may have limited features, which would not meet the needs of most parents.
- 2.5.3 As opposed to the IASPs, some social group respondents, the MLC and the majority of the focus group participants supported MDA's recommendation for a basic version of Internet parental controls with filtering capabilities to be offered free with the subscription of any Internet access package, so as to encourage adoption. They also opined that the IASPs should play their part and be socially responsible. However, some parents and youth social workers in the focus groups queried about the duration that the controls would remain free, and expressed concern that IASPs could choose to offer the controls free at face-value, but increase the overall subscription cost to Internet access packages.

MDA's Response

- 2.5.4 *Having considered the comments received, MDA will revise the initial proposal such that the IASPs would only be required to **offer to new and re-contracting subscribers of Internet access services, a free trial of their Internet parental controls, for a period of 50% of the subscriber's fixed term contract, or 6 months, whichever is shorter.** The free trial would however not be required for re-contracting subscribers who already enjoyed the trial¹⁵ and/or are existing subscribers of the network based Internet parental controls offered by the same IASP at the point of re-contracting. IASPs will be required to **obtain express consent from the subscribers before they can start charging them for the services.** **Should subscribers choose not to continue with the filtering services after the free trial period; the services should automatically lapse without further charges.***

¹⁵ Only applies to trial by the same IASP and experienced in the immediate previous term.

2.5.5 MDA believes that a free trial period of up to 6 months should address parents' initial hesitation to use Internet parental controls due to the lack of certainty over the effectiveness of such controls. At the same time, the ability to charge a subscription fee after the trial period would enable IASPs to offer controls that come with more comprehensive filtering capabilities that better meet the needs of most parents. It is thus a balanced approach taking into consideration the different needs of parents and the regulatory burden on the IASPs.

2.5.6 MDA is mindful that the cost of the Internet parental controls can be a concern for some. In this regard, MDA notes that current charges for Internet parental controls by IASPs range from S\$1 to S\$5 per month, which should not be a financial deterrent for most households. In addition, the Infocomm Development Authority of Singapore ("IDA") administers the NEU PC Plus ("NPP") programme¹⁶, which provides subsidies on purchases of personal computers and subscriptions for broadband connectivity (with an Internet filtering service included) to low income households with school-going children¹⁷.

2.6 Provision of Technical Assistance to Consumers

2.6.1 All IASP respondents commented that they were already required under the Class Licence to provide reasonable technical support to subscribers with respect to the provision of filtering arrangements for the duration of their subscription, and suggested that status quo be maintained. A few individual respondents and some security solution respondents also expressed similar views. The IASP and security solution respondents also pointed out that a complete on-the-spot switch on of network level controls may not be feasible as the switch on process would require some back-end procedures to be done, which meant activation could take up to a few days. For device level controls, the proposed requirement would not be operationally effective given the longer processing time as households today typically own multiple devices.

2.6.2 Conversely, the rest of the respondents and the majority of the focus group participants expressed support for MDA's proposal to complete the switch on of the controls for new and re-contracting subscribers and to facilitate the switch on for existing ones. The common reason cited in the submissions was that it would be convenient and hassle-free for the less technologically savvy subscribers and would help to reduce parents' inertia to subscribe to the controls.

2.6.3 Some parents suggested for Internet parental controls to be pre-installed on devices and for an instructional guide to be provided to assist them in configuring the controls. Some cited the lack of knowledge of such controls by the customer service

¹⁶ Details of NEU PC Plus Programme can be found at this URL: <http://www.ida.gov.sg/Learning/Community-Development/NEU-PC-Plus-Programme>.

¹⁷ This means children from Primary 1 and beyond, and includes the following schools: Government or Government-Aided Schools, Independent Schools, Junior Colleges, Centralised Institutions, Institute of Technical Education, Polytechnics and MOE-funded Special Education Schools.

officers and suggested having a direct interface with the technical experts from the security solution providers.

MDA's Response

- 2.6.4 MDA will **maintain the current requirement in the Class Licence** in which IASPs are required to provide reasonable technical support to subscribers with respect to filtering arrangements, for the duration of their Internet access subscription period. With network level controls, the installation should be significantly simplified, with the IASPs being the party managing the initial switch on of the filter at the network level for the subscribers of the controls. Hence it would not be necessary to include the requirement for the IASPs to set up the controls recommended initially during the public consultation.
- 2.6.5 On the suggestion for IASPs to have an instructional guide to assist subscribers who wish to self-help, MDA is agreeable to include it as a new requirement for IASPs, i.e. IASPs will be required to **provide subscribers with an instructional guide on the use of their Internet parental controls**. On the other suggestions for pre-installing of controls on devices and to have direct interface with technical experts from security solution providers, MDA is mindful of the need to maintain the balance between consumers' wants against additional regulatory requirements on the IASPs and hence will not be further imposing these requirements. However, MDA would encourage IASPs to consider the feasibility of these suggestions to provide better support to parents, especially those who may be less technologically savvy.

PART 3: CONCLUSION AND SUMMARY OF MDA'S FINAL POSITIONS

3.1 Having given due consideration to all the feedback received during the public consultation, MDA's final positions to each of the five areas consulted are as follow:

- a. **Subscription process to facilitate adoption** – Under Required Decision, IASPs will be required to obtain their consumers' explicit decision on whether they want to sign up for Internet parental controls either at the point of subscription or renewal for Internet access, or within 14 days from the point of contracting;
- b. **Content categories filtered by default when the controls are switched on** – For consumers who choose to subscribe to Internet parental controls and switch them on, IASPs will have to ensure that content containing sexually explicit material, violence and gore, is filtered by default;
- c. **Mode by which the content is filtered** – IASPs will be required to provide network level Internet parental controls, with the provision of device level parental controls left to the commercial discretion of the IASPs;
- d. **Subscription cost to consumers** – For new and re-contracting subscribers to Internet access services, IASPs will be required to offer them a free trial of their Internet parental controls, for a period of 50% of the subscriber's fixed term contract, or 6 months, whichever is shorter. The free trial would not be required for re-contracting subscribers who already enjoyed the trial¹⁸ and/ or are existing subscribers of the network based Internet parental controls offered by the same IASP at the point of re-contracting. IASPs will also be required to obtain the subscriber's express consent to charge for the Internet filtering services after the trial period; and
- e. **Provision of technical assistance to consumers** – MDA will maintain the current requirement in the Class Licence in which IASPs are required to provide reasonable technical support to subscribers with respect to filtering arrangements, for the duration of their subscription period. Additionally, IASPs will be required to provide subscribers to Internet parental controls with an instructional guide.

3.2 Effective Date

3.2.1 MDA will be proceeding to amend the Class Licence conditions with respect to IASPs' obligations towards the provision of filtering arrangements. MDA is also committed to concurrently work through the implementation issues with the IASPs. MDA expects the revisions to the Class Licence to be gazetted by end 2016.

¹⁸ Only applies to trial by the same IASP and experienced in the immediate previous term.

Summary of Interested Parties with Submissions to the Public Consultation

At the close of the public consultation on 16 May 2014, MDA received 20 written submissions from the following interested parties:

- (a) Three social groups & the Media Literacy Council ("MLC"):
 - (i) MLC;
 - (ii) Care Singapore;
 - (iii) Focus on the Family; and
 - (iv) Wonderfully Made.

- (b) Four security solution providers:
 - (i) Nominum;
 - (ii) Netsweeper;
 - (iii) McAfee; and
 - (iv) Symantec (Norton).

- (c) Three IASPs:
 - (i) SingNet;
 - (ii) StarHub; and
 - (iii) M1.

- (d) Nine individual members of the public

MDA also engaged an independent third party to conduct seven focus groups and the profile of the participants is as follows:

- (a) Four sessions with parents of students from:
 - (i) Lower primary school;
 - (ii) Upper primary school;
 - (iii) Lower secondary school; and
 - (iv) Upper secondary school.

- (b) Two sessions with general public, who are less likely to require Internet parental controls, i.e. those who are single, married with no children or married with adult children.

- (c) One session with youth social workers.