Comments by: Shashwat Khandelwal

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Dear Ms. Jia,

Thank you for giving us an opportunity to provide comments on "REGULATORY OPTIONS TO FACILITATE THE ADOPTION OF INTERNET PARENTAL CONTROLS". We at McAfee firmly believe that it is our privilege and honour to protect our users from threats online whether they are in the form of malware or inappropriate content and contact for our young.

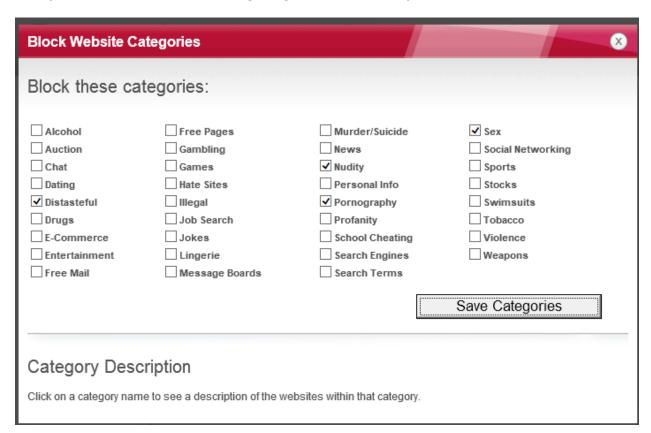
We take note of your key points for seeking views and add our comments in-line.

a. 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;

[Response] We are in favour of your position of "Required Decision". It strikes the right balance between "Inform & offer" and "Opt-out".

b. Filter "adult content" by default when Internet parental controls are switched on, with additional content categories left to the discretion of parents;

[Response] We are in agreement with the default setting. In our own implementation of McAfee Family Protection on PCs, the following categories are blocked by default:



c. Provide network level Internet parental controls by which the content is filtered, with device level Internet parental controls left to the IASPs' own commercial considerations on whether to offer consumers an alternative;

[Response] There are some challenges with a network level Internet parental controls solution. There is a risk of complacency among parents and the ability of the technically savvy to use workarounds. Today's comprehensive parental controls include managing the child's time on specific devices and/or specific websites. Such solutions require a device level implementation at least with current technology.

Further, as identified earlier, the change of a network will lead to the content no longer being filtered.

We believe the right solution is a mix of both approaches since they both bring different strengths and have their own limitations.

The "Required decision" approach can inform parents about both kinds of filtering and they have a choice of opting for either or both of them.

d. Offer to consumers at least a version of Internet parental controls free of charge with the subscription of any Internet access package; and

[Response] An ISP will be better positioned to comment on this. We will gladly work with our ISP partners to create suitable configurations to meet the requirements. At the same time, we believe that education is key to raising awareness of parental controls.

e. 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.

[Response] We imagine that the switch on of parental controls will be performed upon confirmation by the parent to avail it (assumption here being that "Required decision" will be recommended as opposed to "Opt-out"). The network level filtering can be turned on for existing subscribers as well for re-contract / new subscribers. For devices based filtering, one solution could be pre-installing the parental control software on all devices but only enabling it for users who request for it.