

Consultation

“Regulatory Options to Facilitate the Adoption of Internet Parental Controls”

Comments of StarHub Cable Vision Ltd



16 May 2014

Table of Contents

1.	Introduction	3
2.	Comments on the individual proposals	5
2.1	Subscription Process for Internet Parental Controls	5
2.2	Categories of Content to be Filtered	5
2.3	Mode by which the Content is Filtered	6
2.4	Cost to Consumers for Subscribing to Internet Parental Controls	6
2.5	Provision of Technical Assistance to Consumers who want Internet Parental Controls.....	6
3.	Conclusion.....	7

1. INTRODUCTION:

1.1 StarHub Cable Vision Ltd (“**StarHub**”) thanks the Media Development Authority of Singapore (the “**Authority**”) for providing the opportunity to comment on the proposed regulatory options to facilitate the adoption of Internet parental controls (also known as Internet filters). We have carefully reviewed the Authority’s proposals, and our comments are set out in this submission.

Internet filtering service offered by StarHub

1.2 StarHub provides its Internet filtering service - “Safesurf” - to its fixed and mobile broadband customers. This service was originally launched in 2004, but has gone through a number of enhancements and expansions since this time. Safesurf is a network-based value added service (“**VAS**”) which allows parents to protect their family members from undesirable content on the Internet.¹

1.3 The Safesurf VAS can be activated when the customer first signs up for service (or recontracts, and can also be activated via StarHub’s online portal for both mobile and fixed broadband customers. Mobile broadband customers can also sign-up for Safesurf via SMS messaging. This allows customers to quickly and easily implement Safesurf via their individual broadband platforms.

1.4 Once customers have signed-up for Safesurf, the service is automatically activated, and no further installation is required by the customer. By default, Safesurf will already block access to unsuitable websites and Internet content. Safesurf subscribers can also create their own customised blocking categories, and personalise their list of blocked (or allowed) sites. Customers have the ability to remove Safesurf (on a temporary or permanent basis) via password-controlled access. These measures give the customer some control over the content they block.

1.5 StarHub makes significant information about Safesurf available to customers on its webpage, including information (with an instructional video) on how the service can be activated and customised. The Safesurf webpage also links to StarHub’s “Cyberwellness@Home” webpage, providing parents with additional information and tips on the possible risks of Internet surfing.²

1.6 The standard monthly subscription charge to Safesurf is only \$2.68.

¹ See link: <http://www.starhub.com/personal/broadband/value-added-services/safesurf.html>.

² See link: <http://www.starhub.com/personal/support/broadband/services/safesurf-online/safe-surfing-for-your-kids.html>.

Overall Views on Filtering Proposals

- 1.7 StarHub goes to considerable lengths, and incurs significant costs, to ensure the Internet filtering is available to all customers who want it. We already comply with the majority of the Authority's proposals, which is clear evidence that the current regime is robust and effective. We would therefore caution the Authority against imposing additional regulation on Internet Access Service Providers ("IASPs"), without clear evidence of a market failure.
- 1.8 It is important to note that there are already many different types of Internet filtering software (including some free products) available to customers via specialised filtering software companies.³ Software providers have therefore clearly acted to meet consumer demand, and there is therefore little ground for further regulatory intervention by the Authority.
- 1.9 We would also caution the Authority against seeing Internet filters as a "solution" to the problem of inappropriate Internet content. Internet filters inherently involve the application of machine-programmable logic to matters relating to taste, personal opinions, and political/religious views. Unfortunately, Internet filters tend to either block too much content (thereby depriving users of access to legitimate and useful websites) or block too little content (thereby exposing children to inappropriate content). For example, in the United Kingdom, studies have found that the Internet filters used by some IASPs block access to websites focussed on health matters, charities, help groups and even some Government-linked websites.⁴
- 1.10 In addition, Internet filters are not effective in addressing such issues as: cyber-bullying; cyber-addiction; and inappropriate chat-room content. In addition, given Singapore's unique population mix, the definition of "undesirable content" varies significantly from one individual to another, and there is no way to implement an Internet filtering option which would meet everyone's needs.⁵
- 1.11 Rather than focussing on Internet filters, we respectfully submit that it would be more effective for the Authority to raise parental awareness of Internet hazards, and educate them on the alternatives they have.
-

³ For example: "Net Nanny", "Surf Watch", "Sentry Parental Controls", "Online Family.Norton", etc.

⁴ See links: <http://www.bbc.com/news/uk-2543058>, and <http://news.techeye.net/business/camerons-Internet-filter-a-disaster>.

⁵ For example, the Straits Times article of 22 April 2014 "Free tools to keep kids out of dodgy websites" highlighted the case of a parent apparently wanting Internet filters to block "dirty dancing videos on YouTube".

2. COMMENTS ON THE INDIVIDUAL PROPOSALS

2.1 Sign-Up Process for Internet Parental Controls

- 2.1.1 As noted above, StarHub already makes a significant amount of information available to customers on its Safesurf VAS, via StarHub’s website. This information is readily accessible and easy-to-understand. This information allows StarHub customers to make an informed choice about whether or not to take-up the service. Signing-up for Safesurf is also simple (and can be carried out online or via a SMS process). Once the sign-up is completed, Safesurf is automatically provisioned, and no other actions are required from the customer to activate the service. StarHub’s current sign-up process meets the needs of the vast majority of our customers.
- 2.1.2 StarHub would therefore support the “Inform & Offer” approach. This approach balances the need for customers to have access to information on Internet filters, while minimising the delays in processing customers.
- 2.1.3 On the contrary, the “Required Decision” approach would entail the IASPs having to expend a significant amount of effort and resources to modify their existing sales channels. This will inevitably take time, and cannot be implemented within the short-term. The additional process will – inevitably – show down the processing of customers, and create delays and customer frustration. Given that there is no evidence that the current regime is ineffective, StarHub would have concerns with a mandatory “Required Decision” approach.
- 2.1.4 StarHub would also strongly disagree with the “Opt-out” approach. The proportion of households in Singapore with young children is estimated at 25% - 30%, meaning that 70% - 75% of households do not contain young children. Requiring the majority of customers to opt-out of a service that they have never requested for (and are unlikely to want) would generate significant customer unhappiness. In addition, the obligation to remove Internet filtering for these customers would increase the operational burden on IASPs.
- 2.1.5 While the Authority has noted that the UK Government may be exploring an “Opt-out” approach, this proposal has, thus far, been rejected by the UK parliament.⁶

2.2 Categories of Content to be Filtered

- 2.2.1 Today, by default, Safesurf filters pornography, gambling, cheating and malicious websites. However, we would highlight that individual customers have very different views on what content should (or should not) be blocked by default. For example, StarHub’s Safesurf VAS blocks access to the Singapore Pools website (given

⁶ See link: <http://www.bbc.com/news/uk-24104110>.

that this site is related to gambling). However, some customers believe that, given Singapore Pools is a legal and legitimate agency, Safesurf filtering should not apply to that website. It is unclear how the Authority will define the “adult content” to be blocked by default, and how this obligation will be enforced.

2.3 Mode by which the Content is Filtered

2.3.1 Safesurf is a network-based filtering model, and we have no objections to the Authority’s proposal.

2.4 Cost to Consumers for Subscribing to Internet Parental Controls

2.4.1 StarHub is currently offering its Safesurf VAS on a promotional basis, free-of-charge until 30 June 2014. According to the Authority’s description, StarHub believes that the Safesurf VAS would already constitute a “premium” version of an Internet filtering service.

2.4.2 However, we would disagree with the Authority’s proposal that Internet filtering should be offered free-of-charge by all IASPs. It must be recognised that there is a direct and significant cost in providing Internet filtering services. This cost should rightly be borne by those customers that decide to take-up Internet filtering services. If the Authority insists that IASPs subsidise those customers taking Internet filters, the IASPs will end-up having to allocate the costs for such services to their entire subscriber base, which could mean an overall increase in broadband prices.

2.4.3 Mandating that the IASPs offer a free Internet filtering service also ignores the fact that there are already many free Internet filtering software solutions available in the market.

2.5 Provision of Technical Assistance to Consumers who want Internet Parental Controls

2.5.1 Based on the Authority’s consultation paper, it is unclear if the Authority expects the IASPs to pre-activate the Internet filtering service even for customers who do not want the service (i.e. the “Opt-Out” subscription approach). If so, StarHub would strongly disagree with this proposal.

2.5.2 If the Authority is proposing that IASPs provide necessary technical assistance to customers requesting for the Internet filtering service, we believe that StarHub is already meeting this requirement. As mentioned above, customers need only request for subscription to StarHub’s Safesurf VAS, and this service will be activated automatically. No further installation (device-specific or otherwise) is required. If customers want to further customise their Safesurf VAS, instructions on how to do so can be found on the Safesurf website, which also provides a video explaining how further customisation can be done.

3. CONCLUSION:

3.1.1 StarHub appreciates the opportunity to comment on the Authority's proposals. We strongly believe that the existing regime is robust and effective. StarHub customers can already easily subscribe for the Safesurf VAS. Activation of the VAS is automatic, and customers need not do any further installation. StarHub therefore already complies with the majority of the Authority's requirements. From a StarHub perspective, imposing further regulations on IASPs is therefore unnecessary.

3.1.2 Further regulations also ignore the fact that:

- There are many Internet filtering services (including free services) already available in the market. Market forces have therefore acted to meet customer demand.
- There is no perfect Internet filter which would meet the needs of every customer in the market. Parental guidance and public education are more effective tools to protect children from undesirable content on the Internet.
- The Authority already has the ability to require the IASPs to block undesirable Internet content.

3.1.3 For the above reasons, StarHub respectfully suggests that the Authority reconsider the imposition of further regulations on the adoption of Internet filtering services.

StarHub Cable Vision Ltd.
16 May 2014