16 May 2014

Ms Lee Ee Jia
Director (Policy)
Media Development Authority of Singapore
(Attention: Ms Alicia Chay)

Dear Sir,

Symantec Submission to the Public Consultation on the Regulatory Options to Facilitate the Adoption of Internet Parental Control By the Media Development Authority of Singapore

Symantec is a global leader in providing security, storage and systems management solutions to help our customers – from consumers and small businesses to the largest global organizations – secure and manage their information and identities independent of device. Symantec does this by bringing together leading software and cloud solutions that work seamlessly across multiple platforms, giving customers the freedom to use the devices of their choice and to access, store and transmit information anytime, anywhere.

Globally, Symantec has also actively worked with a number of Governments on their online child safety and internet parental control legislations and policies, with the following notable examples:

- Online Child Safety policies in the United Kingdom, and
- The ongoing discussion on the adoption of online child safety policies in Australia.

Symantec welcomes the public consultation on the Regulatory Options to Facilitate the Adoption of Internet Parental Control, by the Media Development Authority of Singapore (MDA) and would like to thank the MDA for the opportunity to provide feedback on the proposed options. We would be happy to provide more information or any clarifications needed on any of the points raised in this paper. Please direct these queries to the undersigned.

Best Regards,

Ng Kai Koon
Director, Government Affairs
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Symantec Submission to the Public Consultation on the Regulatory Options to Facilitate the Adoption of Internet Parental Control By the Media Development Authority of Singapore

Summary
As noted by the Media Development Authority (MDA) in the consultation paper, the current status quo, whereby Internet Access Service Providers (IASPs) are required under their licensing conditions to offer parental control software to subscribers have not met their objectives. However, with children going online at an earlier and younger age, on multiple platforms, it is also more crucial than ever that some form of protection be provided to those who are the most vulnerable.

In general, Symantec supports the offering of Internet Parental Control software with every subscription to internet services. However, to ensure that this requirement does not stifle innovation or competition, Symantec would suggest that any such requirement be technology neutral, with flexibility given to the IASPs and vendors to provide the best solution for their customers. However, MDA should provide some guidance in terms of the basic outcomes that should be achieved with such software, so the solutions selected by IASPs should meet these minimum requirements. These outcomes should also be regularly reviewed to ensure their relevance to a continually evolving threat landscape.

Symantec would like to offer our opinion on the following proposals.

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

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

It is our opinion that the two proposals must be considered together for it to be congruent.

By requiring a free version of Internet Parental Control be included with all subscriptions, it addresses the issue of price as a barrier of adoption. It also makes the Required Decision option more palatable to subscribers, as there is no additional cost to the subscriber.

However, whether a Required Decision or 'Opt-Out' method is adopted, without understanding of what parental control software is, their purpose and usage, it is likely that users will under leverage the software, disabling key functionalities or usage. Ultimately, there needs to be a broader education of parents and guardians of the usage and purpose of such software and the part they play in keeping children safe online.

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

While this is a start, adult content is only the tip of the iceberg where online dangers are concerned. Increasingly, cyber bullying and online predators, through messaging services and social networks are an increasing threat to children online. However, to filter out social networks completely, then belies their benefits and will also encourage children to find their way around such software so as to enable them to access popular social networks.

Thus, besides just straight filtering of 'adult content', the software should also have capabilities that give parents and guardians an idea of their children's activities online, to allow them to assist their children if they are the target of undesirable online behavior.

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

As noted, network level controls have the benefits that it alleviates the need for parents to install and configure software on individual computers as these are applied to any device connected to that subscription service.

However, in an increasingly mobile space, internet access is increasingly through mobile devices, such as mobile phones, and tablets. Besides the fixed line broadband service at home, or the mobile broadband services, these devices (as well as laptops) will connect to the internet through a variety of networks, including publicly available networks (such as Wireless@SG), and other networks that the child will have access to, such as a school networks or even a friend's home service. A network level control will only be able to protect when the child is connected to that particular network as compared to a device-level control, where it will be active, no matter the connectivity.

In addition, there also needs to be recognition that as a child mature, they would increasingly be resistant to intrusions into their privacy and would be resentful of filtering of access. A network level control is generally a blunt instrument and would not allow for differing levels of control among the devices connected to the internet, whereas a device level control would allow for better finetuning of control for particular devices used by different people within the household.

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.

This proposal would largely only be feasible for network level controls. With households now using multiple devices, it may not be feasible for IASPs to install and configure the software for all devices that may connect to the network. Where device level software is

made available, a requirement where easy to understand instructions are provided, and available support from the IASP/vendor should be sufficient, as most modern parental control software have been designed to be easy to install and configure.

Conclusion

With increasing dangers and threats to children and minors online, Symantec believes that this would be a helpful move to promote the use of parental control software among families, giving parents a better sense of what their children are doing online, as well as afford some level of protection for children. However, as noted in the consultation paper, technology cannot provide a completely foolproof method, and parents and guardians need to remain involved and aware of the threats online and be an active part of their children's online journey.