

Concern about mobile content posing risks to children has prompted co-regulatory and self regulatory initiatives by operators. Caroline Dewing explains Vodafone's approach

Protecting minors, offering choice and maximising commercial opportunities

The revolution in information technology has meant that a global audience now has access to an unprecedented amount of information and services. The myriad benefits have been widely discussed, however, due consideration should also be given to possible areas of concern, particularly those affecting young people who are frequently amongst the first to adapt to new technology and are often unaware of the risks that this may present.

These risks are often defined by inappropriate access to the three "Cs", content, such as erotic or violent images; contact, through chat and dating sites for example; and commercialism, including hidden costs in online subscriptions. This new world presents challenges for regulators and content providers alike and it is important

for all elements of the industry to work together to ensure that the responsible delivery of content and services remains a priority for all concerned.

DISTRIBUTING CONTENT IN TRADITIONAL MEDIA

The problem is not new and broadcasters, internet providers, and content providers generally acknowledge that the appropriate distribution of

content including erotic and violent content, chat, dating or gambling services is primarily their responsibility. Traditional media has worked hard to establish Content Standards principles which will enable them to protect young people and allow others to make an informed choice about the media content they wish to access. This has taken time and they have been broadly successful. For example, BBFC film ratings and the 9 o'clock watershed on television are well established and understood. Print publications are frequently controlled within a retail environment by ensuring that erotic publications are placed, quite literally, on the top shelf out of reach of children.

THE WIRELESS WORLD

As "Infotainment" on the mobile is already a reality and

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becoming more mainstream. technological innovations such as the launch of the 3G network means that video streaming, full track music downloads, access to the internet via mobile and video calling will soon become a normal part of the mobile experience. This means that network operators are rapidly emerging into fully-fledged media companies. The new kids on the block in media land must therefore address the matter of responsible delivery of content as carefully as the established players.

It is clear that customer understanding of the innovations will drive take up of the new services available. Education is key and Vodafone in the UK has worked hard to ensure that parents, who are frequently less technologically savvy than their children, have access to information which can help them understand how best to ensure their children are using their phones safely and responsibly. In particular a booklet, *Staying in Touch: a Parent's Guide to Mobile Phones* is available on request and also downloadable from the UK Website - www.vodafone.com.

SUPPLY AND DEMAND

Research shows that most societies acknowledge the right of adults to have access to age restricted content. Furthermore, customer demand for "risqué"

content is high. A recent report from Strategy Analytics argues that the delivery of adult content on mobile will grow from \$400m in revenue in 2004 to \$5bn in 2010 (source: Strategy Analytics, March 2005). It is therefore likely that operating companies that do not provide a wide range of products and services to their customer base will miss out on significant commercial opportunities.

Alongside the demand for age restricted content there is a complementary belief that there should be controls in place to protect customers from content which could cause harm or offence. It is clear therefore that an organisation which provides access to this type of content must ensure customers, particularly parents and carers, are given the tools to control access for their children. Failure to do this will not only lose customer trust but may also attract regulatory penalties as governments feel compelled to intervene.

CONTENT STANDARDS ON MOBILE

For Vodafone, successful development and implementation of content standards policies plays a key role in setting the standards for the appropriate access and safe use of mobile technology in the post 3G, media-converged environment.

Content Standards issues

can be broadly divided into three:-

- How to stop the distribution of illegal content such as images of child abuse, torture etc
- How to satisfy the consumer demand for a wide range of content and services including content which is only suitable for those aged 18 or over or where contact can take place for example in chat rooms
- How to enforce access controls for age classified content i.e. content which has been age classified in other media

Regulators may think about extending existing classification systems to media as a way of managing these issues however the situation becomes more complex when managing content on a global basis. This is due to cultural variation as tolerance levels vary enormously; erotic content in the Netherlands, for example, is commonly accepted however the sale of erotic content in Egypt is illegal. National rating systems reflect these differences and therefore also vary. The management of this area is likely to remain a challenge for both regulators and industry for some time to come.

THE INTERNET EFFECT

The internet has ensured the pace of change has accelerated dramatically. The number of content providers has rocketed, and the widespread availability of free and cheap content makes it almost impossible to monitor the range of products and services available. The current situation is:

- Anyone can publish – anybody with a degree of technical understanding is capable of publishing content online. As a result there are enormous

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numbers, and a lot of different types, of internet publishers, including large corporations, small businesses, minority interest groups and individuals

- Few barriers to access – the ease-of-use of the internet and the vast amount of information that is available means that it is easy for anyone to gain access to content, including age-restricted or even illegal content

- No international borders – internet users can access information and content that has been made available anywhere in the world. This makes it extremely difficult to regulate and monitor. There is also the additional issue of different countries having different classification systems, laws and cultural levels of acceptability

- Mix of content and communications – as well as providing a powerful and widely available platform for the publication of and access to content, the internet also enables a set of interactive communication channels, such as chat rooms, email and Instant Messaging (IM).

SOLUTIONS FOR CONTENT DISTRIBUTION

In the online space governments, Internet Service Providers (ISPs), Mobile Network Operators, NGOs (including charities), regulatory organisations, parents have all recognised the need to take action and, as a result, there are now a range of initiatives underway to tackle content standards issues including:

- New laws and legislation – some governments have passed new laws to protect consumers from illegal and inappropriate content
- Development of content



Content regarded as heart-warming in one country may be seen as pornographic in another

filtering technology – software providers have developed filtering software for the PC that blocks illegal and inappropriate content. This software can be installed and customised by parents to enable a suitable level of protection

- Pan-industry co-operation – internet stakeholders such as ISPs and classification bodies (such as the Internet Content Rating Association – ICRA) are looking at ways to make the internet a safer environment for all users. The Internet Watch Foundation in the UK has been established by ISPs and mobile operators to monitor illegal sites and establish an agreed notice and take down procedure

- Academic and regulatory organisations – these organisations include the EU Safer Internet Programme and the Cyber Research Unit at Lancaster University

- Formation of consumer groups – these organisations provide information for parents and other parties on the

safe use of the internet

ADDITIONAL CHALLENGES FOR MOBILE

The mobile industry faces additional challenges. They include: -

- Anonymity: Whereas traditional media may well have some sort of billing relationship with their customers which requires a credit history and therefore has a built in age verification mechanism, they are able to age verify at point of sale. Many mobile phone customers are pre-pay therefore operators have little indication of their identity or age. Although pre-pay customers can be age verified at the point of sale of the handset, this does not ensure that the individual buying content through the mobile is age verified. This also makes it difficult for operators to target communications to their customers so that the marketing of access controls information for example, has to be kept generic and mainstream.

INTERNATIONAL APPROACHES TO MOBILE CONTENT REGULATION

UK – the development of content standards in the UK was led by the mobile operators. Vodafone was the first to recognise the need for content standards in 2002 and worked closely with the other UK operators and stakeholders, such as Government, Children's Charities and existing classification bodies, to develop an industry-wide Code of Conduct. This led to the formation of the Independent Mobile Classification Body (IMCB) in February 2005. The current classification framework places the onus on the content providers to self-classify all their commercial content. This framework has been designed, as far as possible, to be consistent with existing standards in film and game classification at the age of 18 or over. Vodafone UK was the first mobile operator in the world to introduce age verification processes in August 2004, with other mobile operators following suit in 2005.

Australia – the provision of telephony services (including mobile content) is more tightly controlled by the national regulator, the Australian Communications Media Authority (AMCA). The AMCA has developed a draft Bill to supplement its 1997 Telecommunications Act which addresses the specific issue of providing access to adult content and services via the mobile phone and states that all content rated as 15+ in other media should be made available for those verified as 18 or over.

Germany – Germany operates a media classification system which is based largely on voluntary self regulation. The mobile network operators have recently published their own Code of Practice which outlines an age verification system based on PIN identification for adults. It also provides an opt-out system which allows parents to choose to activate access controls for their children's handsets

Netherlands – The 'Kijkwijzer' is an initiative from the Dutch Institute for Classification of AudioVisual Media (NICAM) which addresses the issue of erotic content across all media including mobiles

- **Versatility:** Mobiles by their very nature can be used anywhere so parents and carers are unable to monitor their children's usage as they do with the television/family computer which can be kept in a family room.

- **Privacy:** Mobiles are generally considered very personal devices so it is difficult for par-

ents and carers to monitor or control what content is on their children's handset.

- **Payment functionality:** Mobiles are increasingly becoming payment vehicles i.e. it is possible to buy and download information using mobile phone credits as payment. Although this adds to their convenience it also raises

questions about how to control payment for age classified or age restricted content.

Given this, the development of mobile content standards has typically been addressed on a county-by-country basis. However, the overall objectives are the same across all markets. It is for this reason that Vodafone is co-ordinating content standards from a global level, defining the key principles but allowing the local operator to develop policies to best suit the cultural norms in their markets. It is hoped that this global policy approach will be adopted by other operators with an international footprint, in the future. What seems to be clear is that as far as possible mobile content standards are beginning to be developed in all advanced mobile markets in order to offer the maximum level of protection whilst continuing to provide consumers with the broadest range of content and services possible.

THE SOLUTIONS

Currently, the approaches MNOs are taking range from industry-led self-regulation to government regulation, or a mix of the two. (See box) Content standards initiatives are also underway in France and the USA, and other countries are expected to follow suit.

VODAFONE'S ACCESS CONTROLS

Vodafone's view is that access controls should be available so that parents and carers can manage content accessed on their children's phones. These are made of two key components:

- Content rating and filtering – how content is age-rated and filtered out if inappropriate
- Age verification processes

– how the operator knows if the consumer is above the age required to access the content. At the moment this process is binary ie 18 or over however it may be extended to other ages in the future.

The implementation of robust age verification processes is clearly more challenging than for some “traditional” media where consumers need to be physically present to buy a video or an adult magazine, for example. In most markets it is possible to identify whether a customer is over 18 by using standard credit card or identity card verification processes and there are a range of methods that operators are currently employing to gather this information:

- In-person verification – users register their details at operator retail outlets, providing proof-of-age using conventional documents such as a passport or driving licence. This can either be carried out upon purchasing a new handset or afterwards, once the user wishes to access age restricted content or services
- WAP registration – users can use their handsets to enter credit card details. These age verification processes are either managed by operators (such as Vodafone UK) or by third parties (such as Bango for Orange and O2 in the UK)
- Registration by phone – users can provide credit details by phone for age verifi-

cation – this can be done with the operator directly or via a third party

Operators offering a range of options for age verification are likely to be more successful in attracting users to register.

Access Controls were first launched by Vodafone UK in June 2004. These will be rolled out to all Vodafone markets in the next 18 months. They currently operate on a binary level i.e. they prevent access to content that is considered from a regulatory point of view, only suitable for the over 18s. However the next major challenge is to limit access to content which is age classified particularly content which has already been classified in other media such as film content and post watershed television content such as “Sex in the City” (UK rated 15 but 18 in Ireland).

IMPLEMENTATION OF ACCESS CONTROL

Depending on the national market operators are also offering a variety of ways in which access controls are to be implemented. It would be fair to say that the degrees of protection may also vary. In general however the solutions operators offer do reflect cultural differences in the provision of information. In France, for example, the concept of “liberté” means that customers are more inclined to have access to content and be given the choice to restrict it themselves whereas in the UK

customers expect the mobile operator to take responsibility and restrict access at source.

In the main access controls are implemented in the following ways:

- Opt-in – operators bar all adult content and services by default and require all users to register and age verify for access. This ensures all users of adult services are over 18. However, the registration process must be simple-to-use to ensure users register. This is the approach adopted by Vodafone in the UK
- Opt-out – operators require subscribers to opt-out of adult content and services. This ensures that as many users as possible can access these services. If this approach is adopted, parents can ask for access to adult content to be barred for their child’s phone
- Pre-pay opt-in – operators assume that all contract subscribers are over 18 and bar all pre-pay subscribers from adult content and services by default. Pre-pay customers who wish to access adult content and services are obliged to register, providing proof of their age and identity

The experience of ISPs in controlling access to the internet alerted MNOs and content providers to the challenges for the mobile content market. These are early days, but all industry stakeholders have acknowledged the issues and are already tackling them. Appropriate and responsible solutions will ensure that adult content can be delivered to adults, and minors can continue experimenting with new products and services, secure in the knowledge that they are doing so in a safe and secure environment.



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