



April 30, 2019

Honorable Wayne Wallingford, Chairman  
Senate Commerce, Consumer Protection, Energy and the Environment Committee  
Missouri Senate

Re: **Opposition to Senate Bill 382, Requires internet service providers to block obscene websites and provide subscribers the ability to create a password to access such websites**

Dear Chairman Wallingford, Vice Chairwoman Riddle and Committee Members:

On behalf of CTIA, the trade association for the wireless communications industry, we write in opposition to Senate Bill 382, which requires internet service providers to block obscene websites and provide subscribers the ability to create a password to access such websites. This legislation prescribes how internet service providers must provide blocking capabilities. Although well intentioned, CTIA believes the bill is not necessary and is unworkable. The wireless industry is committed to providing resources to help families use technology safely and responsibly. As part of this commitment, wireless providers, and many device manufacturers, already offer tools to customers to help manage their mobile experience. Providers offer content filtering technology that works on smartphones, tablets and computers, helping adults and children make positive digital choices everywhere they browse.

The wireless industry understands the concerns raised in the bill with respect to protecting families and children from inappropriate content, online interactions and websites on the internet and has addressed this through its offering of parental controls and filtering capabilities for customers. For example, AT&T offers *Smart Limits* that helps consumers manage their family's phone use by setting sensible limits on texts and purchases, blocking data and viewing daily and weekly activity at home and on the go.<sup>1</sup> Verizon offers multiple options. *FamilyBase* is a service that monitors wireless activities, sets usage limits and includes the ability to block unwanted contacts, apps and inappropriate web content.<sup>2</sup>

---

<sup>1</sup> <https://www.att.com/shop/wireless/smartlimits.html>, last accessed 4/26/19.

<sup>2</sup> <https://www.verizonwireless.com/support/verizon-familybase-faqs/>, last accessed 4/26/19.



*Mobichip Safe Browser* replaces the default browser on a child’s device, enabling parents to block website content on smartphones, tablets and computers.<sup>3</sup> T-Mobile offers a free content blocking service to customers that includes the blocking of downloads, all third-party purchases using a short code, games, ringtones, wallpapers and all chargeable downloads.<sup>4</sup> Sprint offers content filtering that helps protect its devices against adult content and malware while browsing the web on the Sprint network. The account holder can control access to sites or content determined inappropriate in accordance with the Children’s Internet Protection Act (CIPA).<sup>5</sup> Additionally, many manufacturers offer content blocking capabilities within the functionality of the device itself and applications can be downloaded by consumers.<sup>6</sup>

Additionally, CTIA created “Growing Wireless,”<sup>7</sup> which is an online resource to provide parents, teachers and others the tools to ensure a safe and rewarding wireless experience for children. The program provides information regarding parental control features, parent guides, and additional resources for safe mobile device usage.

It is important to note that trying to filter content is even more complicated in a wireless environment. An ISP’s tools won’t necessarily work if a user browses the Internet through a non-browser app. Wireless users access Internet content increasingly through dedicated apps, and not through browsers. Placing an obligation on one part of the online ecosystem will not be effective. Despite this, filtering technology can be circumvented. Proxy services, VPN clients or other ways can be used to bypass network filtering capabilities. This has been used in some parts of the world to get around Internet content censorship.

This legislation would restrict how wireless carriers interact with their consumers by setting overly burdensome requirements on providers that are redundant and difficult with which to comply. Additionally, wireless carriers provide services to customers on a nationwide basis;

---

<sup>3</sup> [https://www.verizonwireless.com/support/content-filtering-faqs/#gidad998407\\_qid647e058255bd](https://www.verizonwireless.com/support/content-filtering-faqs/#gidad998407_qid647e058255bd), last access 4/26/19.

<sup>4</sup> <https://support.t-mobile.com/docs/DOC-2745>, last accessed 4/26/19.

<sup>5</sup> [https://www.sprint.com/en/support/solutions/device/faqs-about-parental-controls-using-content-filters.html?id16=filtering%20%7CALL&question\\_box=filtering%20%7](https://www.sprint.com/en/support/solutions/device/faqs-about-parental-controls-using-content-filters.html?id16=filtering%20%7CALL&question_box=filtering%20%7), last accessed 4/26/19.

<sup>6</sup> <https://support.apple.com/en-us/HT201304>; “The Best Parental Control Apps for Your Phone of 2016” BY JORDAN MINOR, MARCH 10, 2016 PC Magazine, <http://www.pcmag.com/roundup/342731/the-best-parental-control-apps-for-your-phone>, last accessed 4/26/19.

<sup>7</sup> <http://www.growingwireless.com/learn-engage/parental-control-tools/parental-controls-features-and-resources>, last accessed 4/26/19.



bills such as this would create a patchwork of regulation across the country, the cost of which would be borne by all customers, including those in Missouri.

The wireless industry continues to make changes to its customer facing policies to remain competitive in the marketplace. This legislation would work to hamper competition by placing a static set of rules on customer offerings in Missouri, thereby negatively impacting wireless customers in the state.

The most effective approach for states, companies, and other stakeholders is to work together to educate consumers about the tools that are available to them, especially as technology is constantly evolving.

The wireless industry takes the issue child safety seriously by offering tools with the capability to block content and will continue to do so. Thus, CTIA urges you not to pass this bill.

Sincerely,

Lisa V. McCabe  
Director, State Legislative Affairs