

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In re:)	
)	
M2Z NETWORKS, INC.)	File No.
)	
Application for License and Authority to)	
Provide National Broadband Radio Service)	
in the 2155-2175 MHz Band)	
)	

APPENDIX 3

M2Z'S COMMITMENT TO PROTECT MINORS FROM INDECENT

MATERIAL ON M2Z'S NETWORK

M2Z's Commitment to Protect Minors From Indecent Material on M2Z's Network

1. Modeling its proposal for protecting minors from pornography on the free over-the-air broadcast model successfully established by the Commission six decades ago, M2Z recognizes the legitimate expectations of the Commission and Congress for the responsible and efficient use of licensed spectrum. Accordingly, M2Z is committed to developing reliable means to prevent unfettered access to pornography and other indecent material when M2Z provides free, nationwide, interoperable broadband access to all Americans, including school children. To this end, M2Z will actively take steps to prevent access to indecent material by young people.¹
2. Providing broadband Internet access without a subscription charge presents certain unique challenges that must be addressed responsibly by the operator. Where a billing relationship exists, there is great certainty about the identity of the subscriber and therefore action can be taken against the user when Internet standards of proper conduct are violated. Conversely, when there is no regular monthly charge for access, there is no billing information available about the subscriber. Therefore the operator cannot verify with high integrity the subscriber's age, name, address, or other contact information. In a system providing free broadband access, therefore, the network must actively intervene to prevent improper behavior.
3. While there are several approaches that could address these problems, M2Z's current approach is to route free-user traffic through a set of proxy servers, which can examine the traffic flows for improper activity and restrict access as required. This approach will also reduce the need for a large quantity of IPV4 addresses to launch service, because non-global routing address space can be used to communicate with subscriber computers. This technical approach is similar to firewalls used by large scale enterprises, as well as by many schools and libraries to restrict user access to indecent material. This proposed proxy server model will have to be deployed on a

¹ M2Z also will endeavor to reduce the ability of users to distribute spam from its network; however, M2Z will not have the means to completely eliminate spam.

much larger scale to meet M2Z's requirements, but M2Z believes it can effectively do this within the cost constraints imposed by the free access business model.

4. In the proxy server approach, web and other traffic from a user is directed through various network elements to a set of regional servers, which then process the requests. These servers can examine the URL (the web address of a specific piece of content), and compare it with a list of sites that contain pornography or other forms of indecent content. If the requested site is not in the list of problematic sites, then the server requests the data from the remote web server (using the proxy server's own IP address), and then delivers the data back to the user. If the URL is on a list of prohibited sites, then the user is provided with a message that indicates that the URL cannot be accessed.²

5. It is important to point out that, while these measures can be very effective, it is unlikely they will be 100% effective. Some indecent materials may be accessed from time to time, and M2Z will work with the appropriate authorities to take remedial action as needed. The capabilities of content filters change over time and the sites serving up indecent material also change, requiring constant updates of the list. Several companies are in the business of providing such services, and M2Z will strive to use the most effective filters that provide the smallest number of false positives (blocking access to sites that do not contain indecent material). The proposed .xxx domain will also help with this process if it is adopted, by encouraging purveyors of indecent materials to move to a clearly identifiable "zone" that makes it easy for servers to identify such traffic and block it as required.

6. While M2Z's filtering proposal is primarily designed for its National Broadband Radio Service, the company, nevertheless, recognizes that consumers that upgrade to the Premium

² Likewise, when a user sends out email, the outbound SMTP request is redirected by the network to a set of servers. If the user is attempting to send large volumes of email and the traffic matches a profile of spam, the server can reject the email or slow down the rate it can be sent to the rest of the Internet, thereby lowering the desirability of M2Z's network to so called spam merchants.

Services may also be interested in obtaining filtering capabilities. For that reason, all consumers purchasing a Premium Service will have the option of employing content filtering.