

Children's Online Privacy Protection Rule—Comment

Submitted July 26, 1999 by:

BizRocket.com, Inc.
A public company (OTC BB: BIZR)
Mark Ismach, President
160 Southwest 12th Ave., Suite 103A
Deerfield Beach, FL 33442
Voice: (954) 571-7118
Fax: (954) 725-3618
E-mail: Valid.Mail@beb.org
Web site: <http://www.BizRocket.com>

P994504
B25940100012

To:

Toby Milgrom Levin, Federal Trade Commission
Room H-159
601 Pennsylvania Avenue NW
Washington, DC 20580

BizRocket.com, Inc. is the owner of the www.BizRocket.com Web site, a full function portal that includes a search engine that is tied to a public forum enabling consumers to voice their experiences with Individual Web sites. The BizRocket.com site includes an Ethics Bureau that helps consumers and businesses by promoting ethics in the marketplace. The Ethics Bureau has built a reliability seal program, and privacy seal program to help promote e-commerce.

BizRocket.com respectfully submits these written comments as an extension to our verbal comments that were made at the Children's Online Privacy Protection Rule public workshop on July 20, 1999. Our comments on that day included the introduction of our innovation called ValidMail™. We extend these additional comments in the hopes that they will help define the best possible implementation of the Children's Online Privacy Protection Rule. Our primary focus in preparing these comments has been to introduce the Commission and the public to our planned August 1, 1999 launch and implementation of our ValidMail™ system, an electronic means of obtaining parental consent.

Preface

Verification of the age of Internet users can solve many problems associated with the unfiltered access to sites on the Internet. Many parents, government and regulatory agencies, schools and religious organizations are very concerned because the Internet allows children one-click access to X-rated material, weapons sites, drug store sites, and other potentially harmful information. BizRocket.com has invented the ValidMail™ platform to solve these inherent problems.

What is ValidMail™?

ValidMail™ is an E-mail authentication system that verifies the age group and/or profession of the person during the sign up process and prior to assigning an E-mail address.

The ValidMail™ comprehensive online E-mail system resides on the BizRocket.com portal site. The E-mail system allows users that have Internet connections to create, send, receive, and forward messages directly from any browser. The E-mail system is very robust and contains many features like automated vacation replies, message forwarding, signatures, phonebooks, and more.

How Does ValidMail™ Work?

The ValidMail™ sign up process authenticates and assigns different domain names (the tail of the e-mail address), depending on the person's age and status. These domain names are assigned and not changeable. By checking the domain name individual Web sites can instantly identify the age group of people that request entry to their site. Identification can be done both visually, or by using an automated detection program.

The following chart shows the domain names that the E-mail address assigns and what they mean:

Sample E-mail Address including the domain name that is assigned based on age or status	User Type	Required Item
John.doe@validadult.com	Adult	Adult possessing required a credit card or mailed proof of identity
Jr.doe@validteen.com	Teen	Teen E-mail address that was signed up by adult
Little.doe@validchild.com	Child	age 12 and under E-mail address that was signed up by adult
Mary.teacher@validteacher.com	Teacher	Provided validation of teaching status usually a letter from the school
Dr.doe@validdoctor.com	Medical Doctor	Provided copy of medical license
Nurse.jane@validnurse.com	Nurse	Provided copy of RN status
Dr.dentist@validdentist.com	Dentist	Provided copy of Dental license
Law.professional@validlawyer.com	Lawyer	Provided copy of license to practice law
Police.Officer@validpolice.com	Police	Provided proof of from law enforcement agency
Fire.Fighter@validfireman.com	Fire Fighter	Provided proof from fire department
Accountant@validcpa.com	C.P.A	Provided Certified Public Account credentials

Only adults 18 or older are allowed to apply for validated E-mail addresses. Various checking methods are used to validate the applicant. In many cases, the assignment of the E-mail address is instantaneous. In some cases we may contact the applicant to seek additional information.

How Is ValidMail™ Used?

Kids Sites - Children's Online Privacy Act ("COPPA")

The Children's Online Privacy Protection Act mandates that all U.S. Web sites seek the consent of a child's parent prior to utilizing personal information. The law pertains to children age 12 and under.

The fastest way for a Web site to gain parental consent is by sending electronic mail to the parent. That is why there must be a method of verifying that the E-mail address belongs to the adult and is password protected and unavailable to the child. The ValidMail™ system handles these functions.

Here is a step-by-step example of how a Web site can get parental consent using ValidMail™:

Step 1: The child enters a Web site and previews or uses the site's functions without inputting any data. The child then decides that he or she wants to register on the site. A registration form is presented that informs the child that parental consent is required and asks the child for the parents E-mail address.

Step 2: The Web site E-mails the parent a request for parental consent and informs the parent that part of the consent acceptance process is that they must receive a return E-mail reply from a Validadult.com address.

The E-mail includes a link to the ValidMail™ system making it easy for the parent to obtain a ValidMail™ Validadult.com E-mail address, if they don't have one.

Step 3: If the parent does not have an authenticated @Validadult.com E-mail address, the parent goes to the ValidMail™ system by clicking on the link, completes the application, and is assigned a Validadult.com E-mail box (usually on the spot).

If the parent already has an authenticated @Validadult.com E-mail address, the parent answers the parental consent request from that E-mail address.

Note: To make it simple for the parent, we have added another innovation called a Body Signature™ to the ValidMail™ system. A Body Signature enables the adult to store information they use regularly so they can supply it to various Web sites without re-typing it. The user can simply place a check into a checkbox and the information is automatically incorporated it into the body of the E-mail.

The child is now E-mailed that they have been registered by the adult, or that they can go to an additional registration form to complete the process.

This simplifies the process for the adult and the child. As the child enters more and more sites, the parent can easily respond to the parental consent requests. They only had to go through the adult verification process once shortening the process. Then the adult can give the child their

Validadult.com E-mail address for future submission to other sites. This will shorten future parental consent processes.

Pornographic Sites and Other Adult Only Sites

Pornographic sites can place our login program at the entry point to their site. This login program enables the adult to enter their Validadult.com E-mail address, and password. The password is verified in our database, and entry is either allowed or denied.

As a convenience, the E-mail system allows you to automatically forward received messages to any other E-mail addresses alerting you that a message has been received in the E-mail box.

Professional E-mail Addresses

The ValidMail™ system also assigns specific domains to certain professions. We require that the applicant fax or mail proof that they are who they say they are prior to assigning the E-mail address.

For example: a teacher may provide us with a letter from their school, A doctor may provide us a copy of their current medical license. This information should be faxed to (954) 725-3618 or mailed to BizRocket.com, Inc. 160 Southwest 12th Ave., Suite 103A, Deerfield Beach, FL 33442.

Cost

There is no cost to Web sites. There is a small cost to the E-mail box holder as described on the following chart:

E-mail address type	COST (DOT .COM)
Adult E-mail address	\$5 per address
Teen and Child E-mail address	\$1 per address
Professional E-mail address	\$15 per address

A \$1.00 donation will be given to one or more of the charities for missing children for each family @validadult.com E-mail address that is established.

BizRocket.com, Inc. is gratified that we can provide this important service to the Internet community. We plan to build this system to accommodate additional professions and other future uses. We appreciate input from all concerned. Please E-mail Valid.Mail@beb.org.

We would like to express our thanks to the Commission for its open method of accepting input from the public.

Lastly, the financial success of ValidMail™ will help to support the efforts of law enforcement and others that are working to find missing children. This is the most gratifying part of it all.

BizRocket™, ValidMail™, Validadult™, Validchild™, Validteen™, Validdoctor™, Validlawyer™, Validpolice™, Validteacher™, Validcpa™, Validfireman™, Validdentist™, Validnurse™, and all respective .com designations are sole trademarks of BizRocket.com, Inc. All rights reserved.

ValidMail™ is an E-mail authentication system that verifies the age group and/or profession of the person during the sign up process and prior to assigning an E-mail address.

The ValidMail™ comprehensive online E-mail system resides on the BizRocket.com portal site. The E-mail system allows users that have Internet connections to create, send, receive, and forward messages directly from any browser. The E-mail system is very robust and contains many features like automated vacation replies, message forwarding, signatures, phonebooks, and more.

How Does ValidMail™ Work?

The ValidMail™ sign up process authenticates and assigns different domain names (the tail of the e-mail address), depending on the person's age and status. These domain names are assigned and not changeable. By checking the domain name individual Web sites can instantly identify the age group of people that request entry to their site. Identification can be done both visually, or by using an automated detection program.

The following chart shows the domain names that the E-mail address assigns and what they mean:

Sample E-mail Address	Age Group	Requirements
<u>John.doe@validadult.com</u>	Adult	Adult possessing required a credit card or mailed proof of identity
<u>Jr.doe@validteen.com</u>	Teen	Teen E-mail address that was signed up by adult
<u>Little.doe@validchild.com</u>	Child	age 12 and under E-mail address that was signed up by adult
<u>Mary.teacher@validteacher.com</u>	Teacher	Provided validation of teaching status usually a letter from the school
<u>Dr.doe@validdoctor.com</u>	Medical Doctor	Provided copy of medical license
<u>Nurse.jane@validnurse.com</u>	Nurse	Provided copy of RN status
<u>Dr.dentist@validdentist.com</u>	Dentist	Provided copy of Dental license
<u>Law.professional@validlawyer.com</u>	Lawyer	Provided copy of license to practice law
<u>Police.Officer@validpolice.com</u>	Police	Provided proof of from law enforcement agency
<u>Fire.Fighter@validfireman.com</u>	Fire Fighter	Provided proof from fire department
<u>Accountant@validcpa.com</u>	C.P.A	Provided Certified Public Account credentials