Summary and analysis of public comments for:

New CyberSafety Constituency Petition and Charter

Comment period ended: 5 April 2009

Summary published: 5 June 2009

Preparation by: Robert Hoggarth, Senior Policy Director

I. BACKGROUND

In June 2008, the Board of Directors endorsed a series of recommendations on how to improve the structures and operations of the Generic Names Supporting Organization (GNSO). One of the significant drivers of those recommendations was the goal of maximizing participation in the GNSO and its policy development processes. Among the various recommendations endorsed by the Board was that ICANN take steps to clarify and promote the option to self-form new constituencies as a means to increase participation in GNSO policy development activities.

The current ICANN Bylaws provide that any group of individuals or entities may petition the Board for recognition as a new or separate constituency, in accordance with Section 5(4) of Article X. Such a petition must explain (1) why "the addition of such a Constituency will improve the ability of the GNSO to carry out its policy-development responsibilities" and (2) why "the proposed new Constituency would adequately represent, on a global basis, the stakeholders it seeks to represent."

The ICANN Board has now received a total of four formal petitions from prospective constituencies, including the subject of this forum - the CyberSafety Constituency. At the direction of the Board, the ICANN Staff developed a two-step process for potential new constituencies to follow. The proponent of the CyberSafety Constituency completed the first step of the process on 20 October 2008 by filing a Notice of Intent to Form a New Constituency. The proponent of the CyberSafety Constituency completed the second step of the process - submission of a New Constituency Petition and Charter on 23 February 2009 - see CyberSafety Introduction Letter to Petition and Charter Document and CyberSafety Constituency Petition and Charter (23 Feb 2009-Redacted).

Community comment on new constituency petitions and charters is an important component of the Board's evaluation of these petitions and will be used to inform the Board's decisions to approve, reject, or, at its option, to recommend any alterations or amendments to the various submissions.

II. GENERAL COMMENTS & CONTRIBUTORS

At the time this summary was prepared, a total of 293 parties had submitted more than 300 separate comments to the forum. While the largest number of comments seemed to come from the United States and the United Kingdom, there were also comments purporting to originate

from Iran, Japan, Pakistan and Newfoundland and even a comment written in Portuguese. The various contributors, a combination of both individuals and organizations, are listed in Appendix A at the end of this document.

Most of the contributors were clearly new to the ICANN forum process. Many proponents of the CyberSafety Constituency (CSC) petition and charter were invited to comment by supporters of the CSC petition and clearly did not have a thorough understanding of GNSO Constituencies and the role of the proposed CSC in the GNSO structure. Similarly, many CSC opponents were seemingly not from the ICANN community and several seemed inspired to comment by media attention regarding the CSC petition and this forum.[1]

III. SUMMARY & ANALYSIS

This document is intended to broadly and comprehensively summarize the comments of the various contributors to this forum but not to address every specific argument or position stated by any or all contributors. The Staff recommends that readers interested in specific aspects of any of the summarized comments or the full context of any submitted comment refer directly to the specific contributions in the forum.[2]

Very few comments reflected any ambivalence about the CSC proposal. Commenters tended to be either strongly in favor or strongly opposed. Within each camp the reasons for support or opposition were limited to a few major categories as described below.

A. Proposal Supporters:

Well over half of the forum comments expressed support for the CSC proposal. Supporting comments generally addressed one or more of three major themes -

- The importance of promoting online safety for children and families;
- The need to expand participation, voices and diversity of non-commercial views (including those of smaller groups) within the GNSO; and
- The need for broader community/society/ICANN focus on security and cybercrime issues

In reacting to these themes, some opponents expressed concern that the CSC mission was too narrow. Other contributors seemed interested in the concept of the CSC but demanded additional information and clarification of the CSC's mission, membership and intentions.

---

[1] An 18 March 2009 article (http://www.theregister.co.uk/2009/03/18/mormons_icann/) published on The Register web site seemed to influence a number of submissions opposing the CSC petition and charter and the contents of those submissions seemed to draw from allegations made in the published article.

[2] A significant minority of the submissions are not summarized here as they largely constituted baseless religious diatribes against the Mormon religion that appeared to be intended to inflame ill-informed opinions rather than to thoughtfully evaluate the merits of the CSC proposal. Other "form letter' opinions are generally described herein but not specifically singled out or summarized because they reflect blanket expressions of support without contributing any discussion regarding the substantive merits of the petition and charter. All those supporting and opposing comments have been preserved in the Comment Forum (see http://forum.icann.org/lists/cyber-safety-petition/).

1. Promoting Online Safety for Children and Families –

Most supporting contributors had something to say about the importance of providing "protection for children and families" from bad or criminal activity on the Internet. This bad behavior was defined in a number of ways and included primarily pornography, child pornography, spam, phishing and fraud. For example, Ray Linford of Central Registrar, Inc. said, "having a constituency to represent the interests of children, families, and victims of cybercrimes is of great import, given their often under-represented position." Pamela Dean said, "we should be able to be protected from unwanted internet solicitations, particularly those that are obscene." Fahd Batayneh said cyber-safety and related security topics require more attention because "the majority of the us are really not interested in getting our kids exposed to harmful content."

Steve Newell asserted that, "ignoring the political ramifications of technical decisions does not make them politically neutral. The CSC can help make sure that those technical decisions have as few negative effects as possible on children, families, and other groups."

Tracy Beagly asserted, "free speech requires responsibility." She said, "Authorities must have the ability to locate and stop those involved in illegal activity, such as cybercriminals and those producing and purchasing child pornography. It is in our best interest to provide safety to all individuals from those who are engaged in illegal activity on the Internet."

Of the 185 comments submitted in support of the CSC proposal, more than 40% were inspired by a letter writing campaign generated by CSC proponents.[3] These submissions typically read:

> "Please approve the formation of the newly proposed CyberSafety Constituency. Online safety for children is an ever-increasing need of utmost importance. I feel strongly that the formation of this constituency will be very beneficial in the discussion and implementation of new ideas and policies for making the Internet better for all."

Some commenters pointed out the existence of the letter writing campaign as evidence of bad intent.[4] Others focused on the content of the message, rather than the fact of the campaign itself. Commenter George Sadowsky (GS) noted that the Board should take the number of messages in support of the CSC as "evidence of a committed campaign among a small but vociferous minority of believers in this cause who are acting as a pressure group." Mr. Sadowsky said, "there's nothing wrong with this behavior, but what they arguing for is in effect the beginning of content filtering that could destroy the Internet as we know it."[5]

2. Promoting Diversity and Minority Viewpoints

Many substantive comments supporting the CSC said it was important that "all" non-commercial entities have the ability to express their views in the GNSO's new Non Commercial Stakeholders

---

[3] The submission of Matthew Greenwood included a copy of the campaign solicitation letter accompanied by suggestions on the form and substance of a communiqué to be sent to ICANN.
[4] See e.g., submissions by Roger Matthews and several other commenters noting their objection to a campaign to "stuff the ballot box."
[5] See Section B.1 below for a broader discussion of "censorship" allegations and rebuttals to that viewpoint.

Group (NCSG). They expressed frustration at the inability to express views in the current GNSO non-commercial constituency structure and asserted that the CSC proposal was not an attempt to assert any new power but was more of an effort to ensure that all voices had an opportunity to be heard in a meaningful way.

Marsali Hancock (MH) of the Internet Keep Safe Coalition said, "I am convinced that this charter will give the broadest and fairest voice among all constituencies within the NCSG." MH said the CSC Charter "ensures that all constituencies have a chance to be heard in recommending non-commercial user policies to ICANN. This as an essential element in establishing a fair and credible non-commercial stakeholder group."

Robert Peters from Morality in Media said, "I feel strongly that the formation of this constituency will be very beneficial in the discussion and implementation of new ideas and policies for making the Internet better for all."

Donna Rice of Enough is Enough said the CSC "will be beneficial in the implementation of new ideas and constructive policies and will give the broadest and fairest voice among all constituencies within the NCSG. This will also ensure that all constituencies have a chance to be heard in recommending non-commercial user policies to ICANN, which is an essential element in establishing a fair and credible non-commercial stakeholder group. The cyber-safety constituency fills a significant gap in the breadth of representation within the NCSG. This new constituency will add another much-needed dimension to the discussion of issues impinging on safety [in the GNSO]."

Linda McCarthy said creation of the CSC will help ensure that "all constituencies have an opportunity to be heard in recommending non-commercial user policies to ICANN." She said this is "an essential element in establishing a fair and credible non-commercial stakeholder group."

CSC Membership Itself –

Doug Souzado (DS) noted that the CSC membership roster evinces a diverse group of individuals from different states, countries and religious backgrounds. "Last time I checked," he also said, "being a member of the Mormon Church did not preclude you from having a voice at ICANN or any other public or industry forum."

Ralph Yarro (RY) said, the CSC membership "reflect(s) the functional, geographic, and cultural diversity of the Internet at all levels of policy development and decision-making." RY asserted, "For good or for ill the ICANN model is already based on separate constituencies representing different kinds of stakeholders. ICANN has specifically requested the formation of many new constituencies as part of the GNSO restructure." RY downplayed the purported influence that the CSC might have within the GNSO. He said, "The CSC is only one of those [constituencies]. It will impose no different financial burden and have no greater influence than any of the other constituencies." He said, "there is no chance the CSC will dominate anything."

Debra Peck (DP) noted that the GNSO restructuring effort "expressly seeks the creation of new non-commercial constituencies to increase the breadth of the involvement in the GNSO. DP said the CSC proposal will "simply create a formally recognized constituency with this focus in the non-commercial users house of the GNSO. The fact that others are also concerned about security in other constituencies and other ICANN structures does not preclude that." She said, "The CSC would be one constituency among many. The entire non-commercial stakeholder group is only one of four houses. The other three are commercial. Policies are built by consensus and voting. No one is going to convince the other Council members to consider 'commercially nonviable' proposals, even if they could be raised in this venue."

Jennifer Warburton (JW) observed, "I am wondering how many people have taken the time to actually read the [CSC] petition." JW said, "From my reading, the petition will represent the voice of the people who are currently not represented at ICANN. I am all for protecting free speech and at the same time I am supportive of ensuring that the decisions made by ICANN include the voices of victims, children, and the little non-commercial users like me who do not have major business funding me and the issues I care about. JW noted that many anti-CSC allegations "are unsupported or irrelevant." She said, "I support the [CSC] petition because it will bring new diverse voices to the table for the discussion and to me, that is free speech at its finest.

A Counterpoint Concern –

An underlying counterpoint to this point of view was concern about the value of "single-interest" constituencies. Several commenters characterized the CSC petition in that manner. The concept was best summarized by Elliott Noss (EN). EN objected to the creation of single-interest constituencies. He said, "representing a single interest with a constituency has the effect of slowing the whole policy effort by minimizing productive compromise." EN said, "Whois and new gTLDs are existence proofs of this. Adding another single-interest constituency will only worsen this problem." Milton Mueller also expressed concerns in this regard. He asked, "Does ICANN really want Council seats to be occupied by small motivated factions who organize their own constituency?" His answer, "That approach is a sure-fire way to continue the gridlock that has plagued GNSO deliberations. The Board needs to firmly reject it, and adopt the NCSG charter proposed by the NCUC. That will make it possible to have diverse constituencies, while rewarding and encouraging cooperation and consensus-building within the SG."

Comments Suggesting More Information Is Necessary –

Antony Van Couvering (AVC) said the CSC must more clearly identify its role, purpose and membership. He said, "Before ICANN admits a constituency, we ought to have a clear sense of that constituency's charter, who its membership is intended for, a convincing explanation of what as-yet-unfilled role they would play, and a name that clearly denotes the constituency's function. AVC said, "I believe this petition should be sent back to the authors for improvements. If, as they say, they want to work in ICANN in the spirit of ICANN, they need to be much less opaque about their objectives, their role, and why they are needed at ICANN. In particular, if law enforcement wants to have a role at ICANN, they need to be much less shadowy."

Go Daddy supported the creation of some role for security and safety concerns within the GNSO, but had "concerns" about the present CSC proposal. Go Daddy asked the CSC to clarify and provide additional information on issues such as membership (Go Daddy thinks it is too broad) and content concerns (which the registrar believes are outside ICANN's remit). Go Daddy noted that while the petition letter mentions the possible inclusion of law enforcement agencies, this is not indicated in its Notice of Intent to Form a New GNSO Constituency (NOIF), and is only briefly mentioned in the proposed charter. Additionally, Go Daddy said, "by limiting membership to non-commercial entities, the participation of commercial security providers is limited or excluded entirely."

The Internet Commerce Association (ICA) said it supports reasonable efforts to assist parents in assuring that their children are not exposed to inappropriate content transmitted across the Internet, but asserted that "this misguided initiative should either be rejected outright or returned to its proponents with a request for far greater specificity and candor as regards their true aims and the content classification methods that would be required to achieve them."

3. Need for Broader Focus on Security and Cybercrime Issues

Although the majority CSC supporters named pornography as their chief concern, a number of supporters noted a broader range of issues that could be addressed by the CSC.

Brad Jackman said, "I urge you to strongly consider adopting this new Constituency to monitor and review what ICANN can do within its jurisdiction to prevent, track, and stop cyber crimes. I am also interested in what the [CSC] may be able to do about predatory phishing operations, ISPs who host the websites advertised in spam e-mails, and other illegal, offensive, and immoral issues."

Naveed ul Haq counseled specifically against content regulations but noted a list of topics including child pornography, spam, phishing and other "cyber crimes affecting service provider to end-users." He said those issues should be discussed and debated through a new GNSO constituency.

RY said, "decisions made at ICANN (such as those relating to the WHOIS database and fast flux hosting) are highly relevant to the existence of cybercrime and the ability of law enforcement to respond.

Earl Mott (EM) said, in its attempt to reach out to broader user participation, ICANN "should have a constituency that includes groups who are concerned about fast flux hosting, WHOIS, registrants rights and all kinds of issues discussed within ICANN every day that relate to online safety."

B. Strong Proposal Opponents:

Generally, opponents of the CSC proposal asserted that the proposal should be rejected for three primary reasons:

- Censorship is bad;

- Content regulation is beyond ICANN's organizational mission; and
- Parents and Individuals should act independently without government or other intervention (utilize existing security and filtering technologies and other means) to protect themselves from unwanted Internet content.

1. Censorship is Bad

According to many CSC opponents, the proposed new constituency could place ICANN on the "slippery slope" to content regulation. The great majority of opponents focused on this concern.[6] Opponents raising this issue often also complained about the potential for minority or religious groups to dictate content controls. Supporting commenters rebutted this characterization of the CSC's motives.

Bill Graham (BG) of the Internet Society (ISOC) said, "It is clear from the Petition and Letter proposing to form the new Cybersafety Constituency that the intent of the constituency is to seek to control or regulate content on the Internet. ISOC is opposed to the proposal."

Derek Allison said, "Filtering one type of content only opens a Pandora's box on requests to put all other content on its own port. This is unnecessary and unwarranted. What one person finds offensive, another does not."

Don Walli said, "The creation of such a policy-setting entity would serve as the first step in a broad-based erosion of free expression and religious freedom for everyone outside this very small group."

Elliott Noss (EN) and GS agreed that "any attempt to categorize content personally will subject all users on the Internet to the judgment of one or a few individuals. Any attempt to categorize content automatically will result in gross errors that will be harmful to the Internet as a whole."

Michele Knight (MK) commented, "I still can't work out what all the fuss is about and how people say they are being deluged with inappropriate material. The whole thing just sounds like a censorship exercise to me."

Edwin Rots said, "While the intentions of the petitioners are (without doubt) the best, blocking content is a slippery slope - particularly on politically 'hot' topics."

Elly Canday warned that the CSC would "invariably propose changes that are technically unfeasible and that would squelch free speech on the internet."

Freedom Against Censorship Thailand (FACT) said, "We must not permit private organisations to take control over content. It is far too easy for private groups to have a hidden moral, religious, gender, political agendas. Not that governments do much better. But at least in case of governments or international governing bodies, there can be the distant possibility of transparency, accountability and oversight."

---

[6] Several commenters mentioned the potential connections that CSC supporters had with a group called CP80, a group that has been quite outspoken on content control matters.

Daniel Lyke said, "in practice we far too often see that giving wider control over communication and speech results in more oppression and more exploitation."

Jerry Latham said, "In this specific case, while [I] applaud attempts to reduce 'porn' on the internet, I am equally if not more so opposed to anything approaching censorship of anything.

Patrick Chipman said, "Even discounting the conspiracy theories promoted by some with regards to the CSC, it is clear that an organization that seeks 'cybersafety' through increased regulation while excluding commercial interests is likely to attract a pro-censorship constituency of individuals."

CSC Proponents Dispute Censorship Claims –

CSC proponents asserted that the CSC will not be a censorship body. Scott Hilton said the CSC will "have a positive impact on ICANN policy and will give Internet users around the world a voice within ICANN, without sacrificing any of the open principles upon which the Internet was founded."

Earl Mott said, "the CSC is not an attempt to censor the Internet, and would not begin to have power to do that, even if it were within the purview of ICANN's capabilities.

DS asserted, "The CSC is not trying to censor, block, or zone adult content on the Internet. In any event, it is offensive to compare CSC members to countries that are using porn censorship as an excuse for suppressing political speech. ICANN deals directly with these issues (e.g., WHOIS and fast flux hosting) and the CSC should be able to weigh in when important decisions are being made."

Mamadou Kokaina said, "CSC supporters advocate that ICANN should not attempt to usurp jurisdiction it does not have and are committed that ICANN should not migrate into content control." He seemed to challenge promoters of free expression and said their principles of openness and of free expression are quite inconsistent when they try to silence a potential new constituency that represents a large segment of non-commercial Internet users. He asked, "why not let us speak as one of many voices at ICANN and, if you think it necessary, persuade others in the GNSO process to agree with you?"

Allan Smart said, "To believe most of the arguments in opposition to the CSC is to believe that Internet safety is not an important issue or the CSC is directed by religious nutcases or controlled by dictatorial censors. That is not the case and the irony is that some of these assertions are made by those who would prohibit the choice of anyone with a differing opinion than theirs."

JW observed, "I am wondering how many people have taken the time to actually read the [CSC] petition. So many comments are reacting to the port limitations for certain content but that material is not in the [CSC] petition."

2. Content Regulation is Beyond ICANN"s Targeted Mission

CSC opponents claim that content regulation is outside the purview of ICANN's mission. Some asserted that other organizations are better positioned to address concerns of children and families about certain Internet content. Others feared that a CSC would distract the GNSO or redirect scarce resources in unproductive ways.

GS commented, "it is clear to me that ICANN is and should not be in the content regulation business. Nothing in its bylaws or values supports such activities. The security and stability of the Internet is not threatened by the availability of content; indeed, a free and open Internet may be the best policy for its security and stability."

Randy Wyatt said, "The proposed charter and mission is well beyond the scope of ICANN's current mission and would be mission creep." He claimed that an organization could be formed "outside the confines of ICANN and still have a very good measure of success." He said, "ICANN should only care about content when it poses a risk to destabilize the internet."

EN said, "the subject matter is inappropriate for ICANN. ICANN is responsible for the administration of names and numbers." Michele Neylon (MN) said content is "beyond the scope of ICANN's remit."

Samuel Goldstein said, "Nowhere in ICANN's core values or mission statement is it indicated that ICANN is intended to be an arbiter of content: on the contrary, the stated values aim for freedom, neutrality, and interoperability."

Clark Dorman said, "Further, it is not ICANN's task to separate out content based on the offensiveness of content. There are more appropriate mechanisms for doing so that do not involve ICANN."

Michael Bauer said, "Prevention of, and prosecution of, criminal activity is better addressed by the various government law enforcement agencies around the globe. This constituency should not be created, because it is trying to solve social problems with technical solutions. ICANN is an inappropriate forum to address these problems." Mike Place agreed, saying, "It should not be within the purview of ICANN to address social problems with technical solutions." The ICA said, CSC proponents should, at least, be required to provide a detailed explanation of how such social policy enforcement relates to ICANN's narrow technical mission.

Scott Francis (SF) said, "I fail to see any technical basis for the proposed new constituency: it does not address technical shortcomings, Internet governance issues, scalability problems or security concerns." He said, "If there is no technical issue being solved here, that leaves only political issues, which is explicitly what the Internet infrastructure does NOT get involved in."

Watson Ladd said, "ICANN is primarily a technical body with partial responsibility for Internet governance. However, the RFC Editor has already addressed the issue of illegal activity in RFC 3514."

Alexandr Pshenichkin said, I see very little in the proposal that has to do with true "Internet safety" -- secure transactions and communication, protection from phishing and identity theft,

and, yes, the ability for the 'end user' to filter out undesirable content. All of these are concerns that affect all users, not just a special group of "families, children, religions, educational institutions, crime victims, spam victims."

Steve Kent feared that the CSC "could politicize ICANN. He said, "Such a concern would inevitably involve ICANN in national, regional, and local political debates regarding content. This involvement would dilute ICANN's resources and reduce it's [sic] focus on international areas of cooperation."

Sanford Duryee said, "Within the scope of ICANN, recognition of a constituency depends upon the "ability of the GNSO to carry out its policy development responsibilities." He said ICANN should not recognize constituencies that are irrelevant to its mission.

BG from the ISOC said, "If accepted, the introduction of this new constituency would lead ICANN into new policy areas that are inconsistent with its mandate and inappropriate for the organization, whether at the level of the GNSO or the ICANN Board."

3. Parents and Individuals Have The Job to Protect Themselves

CSC opponents assert that the ills about which the CSC proponents complain are best handled by parents controlling and supervising their children and by individuals managing their web use more proactively by utilizing existing software tools that can shield users from unwanted content. This theme was also captured by contributors who asserted that existing laws around the world regulate content by varying degrees of success or punish bad actors with existing laws.

MN said, "If the primary concern is protection of children, which it would appear to be, then there are already several national and international bodies that are well established to deal with this and have the existing contacts with law enforcement and ISPs etc."

Randy Wyatt said security is the responsibility of each individual user of the Internet and MK said, "Safety of children is responsibility of parents [and] individuals who contract for the internet service."

Brian Keefer said, "Filtering of content is a service, not a fundamental part of Internet design. There are many services and products that an end-user may avail themselves of in order to block objectionable content. Parents should implement local computer/user restrictions. which is already possible today without the creation of a new constituency." He said, "Trying to enforce morality through technology is horribly misguided."

Edwin Rots said, "Policing access to objectionable materials is not a government (or ICANN) task, and the primary responsibility for ensuring children are not exposed to this sort of material must ultimately lie with parents and guardians." And Trevor Rotzien said ICANN should be cautious; "personal accountability is key," he said.

Michael Bauer said, "Protection of the vulnerable is better addressed by the guardians of the vulnerable -- competent parenting being first and foremost."

Marybeth Griffin said, "Parents have a responsibility to raise their children, but they do not have an inherent privilege to infringe on other's unfettered access to something they in particular find wrong."

Sai Peregrinus said, "Online safety is the responsibility of the user, or, in the case of children, of the parent. Access controls are a waste of money."

Andrew Wiesman said, "Net nanny and many programs like it exist so that concerned parents can monitor and restrict what their children see and do online. This is a local and personal responsibility, not one that should be distributed to the entire internet."

Roger Whitaker said, protecting the children is the duty of the parents who are responsible for regulating their children's computer use.

Dennis Richards said he endorse the idea that children should not view pornography, it is the parents and other responsible adults that should be acting as the guiding force for the children, not ICANN.

Peter Tomlinso said "I DO have children and I DO monitor what they do on the internet. That is my job as a parent and I choose to NOT have someone else decide what is in my/their best interest."

Joan Irvine of the Association of Sites Advocating Child Protection (ASACP)[7] said, "There is a common theme: good parenting and education. And that is the message we should be putting out there, not blocking content that a particular group of adults believes is unacceptable to them. This type of censorship is inappropriate for ICANN to become involved in."

IV. NEXT STEPS

The ICANN Board is likely to consider all the relevant community input and move forward with guidance regarding all the new constituency submissions, including the CSC, as soon as practicably possible. Any decisions with respect to the approval of the new constituency charters will likely take place in the context of the GNSO Improvements implementation processes.

---

[7] ASACP identifies itself as an online child protection association that is funded by the adult entertainment industry.

Appendix A

List of Contributors to the CyberSafety Constituency Comment Forum
(Alphabetical Order):

a
Ahlstrom, Tyler
Aiken, Debra
Alianza, Inc. - Beutler, Brian
Allen, Sue
Allison, Derek
Anderegg, Adam
Anderson, Lauren
Anderson, Robb
Anderson, Shauntelle
Andres, Peter
Association of Sites Advocating Child Protection (ASACP) - Irvine, Joan
Babcock, D. Russell
Ball, Lyle
Barney, Christopher
Batayneh, Fahd
Bauer, Michael
Baugh, John
Bay, Shawn
Beagly, Traci
Bergstrom, Scott
Beus, Deborah
Beutler, Chelsea
Bird, Travis
Black, Hugh
Blackburn, Ferr & Shirley
Blanchard, Jared Dean
Blomkvist, Tobias
Boura, Malcolm
Boyack, Connor
Bradshaw, Joel
Bratt, Inc. - Bratt, Perry (2)
Brewer, Mark
Brown, David
Bullock, Kyle
Bullock, Nicole
Burau, Nick
Burgers, Rob
Burggraaf, John
Canaday, Elly
Canseco, Jen

Canyon Park Mgmt Co. - Macdonald, Tom
Carpenter, Brian
Castello, David
Central Registrar, Inc. - Linford, Ray
Chambers, Carol
Chambers, Jay
Chandler, Lynn
Chipman, Patrick
Citizens for Decency - Cobia, Craig
Cobia, Chantal
Cochran, Nathan
Cohen, Alexander
Collins, Jonathan
Communities For Decency - Moreno, Cindy
Cook, Randy
Corpany, Jon
Cox, Brent
Crittenden, Amy G.
Cronk, Robert
Crowther, David
Currier, Ronald
Curtis, Brenda
Cutler, Shaun - ind (2)
Damon, Lee
de Freitas, Sergio
Dean, Pamela
Debbie
DiCaprio, Paul
Doan, AL
Dorman, Clark
Driggs, Matthew
Drumour Schoolhouse
Duce, Shari
Duffin, Lara
Duryee, Sanford (2)
Earl, John (2)
Eeman, Ted
Enough is Enough - Hughes, Donna Rice
Erickson, Chesley
Feise, Joe
Ferguson, Brian
Flowers, Jeff
Forysinski, Nicholas
Francis, Scott
Frandsen, Amy
Freedom Against Censorship Thailand (FACT

Freeman, Bradley
Garner, Jodi
Gines, Linsey
Go Daddy, Inc.
Goldstein, Samuel
Gordon, Amy
Greenwood, Julie
Greenwood, Matthew
Griffin, Marybeth
Grover, Jeff
Hall, Brian
Halloran, Robert K.
Henderson, Carl
Heston, Gary
Heuston, Benjamin
Hicks, Jacob - ind
Hilton, Scott
Hleec
Hoffer, Eric
Hofhiens, Kimberly
Hogan, Patrick
Holley, Brad
Hosking, Paul
Hountomey, Jean-Robert
Howard, B.
Hunt, Stephanie
Hunt, Thomas
ian
Internet Commerce Association (ICA) - Phil Corwin
Internet Keep Safe Coalition- Hancock, Marsali
ISOC - Bill Graham
Jackman. Brad
Jacob
Jardine, Chad
Jenkins, Brent
Jensen, Liz
Joy, Thomas
Judd, Wade
Karengin, Dean
Keefer, Brian
Kellogg, Cassandra
Kent, Steve
King, Amy
Kirikos, George
Knapton, Ken
Knapton, Ken

Knight, Michele (2)
Kokaina, Mamadou
Kotter, Rikke Ann
Koyle, Jade
Ladd, Watson
Lasswell, John
Latham, Jerry
Lee, Ranae
Lesher, Tilghman
Lesko, Pete
Lewis, Phill
Linton, Steve
Lopez, Debra
Lucas, Karla
Lyke, Daniel
Lyman, Kathryn
Lyon, Matt
Malcarada
Maness, Timothy
Manning, Jill C. (2)
Matthews, Roger
McCarthy, Linda
McCloskey, Rick
McCluskey, Laura
McTim
Meservy, April
Miner, Paul
Mitchison, Neil
Monson, Heidi
Monson, Jay and Jane
Monson, Merrianne
Morality in Media - Peters, Robert
Morris, Vicky & John
Mott, Earl
Mott, Earl (3)
Mueller, Milton
Murphy, Mario
Murray, John and Rose
National Gateway, Madsen Michael
Nelson, Elizabeth Anne
Nelson, Gareth
Nelson, John
Newell, Steve
Neylon, Michele
Nielsen, Ina
Norman, Dennis & Kay

Noss, Elliott
olfecker
Olson, Scott
Ordonez, Rebecca
Osnow, Joe
Parker, Heidi
Paul, Dan
Paulsen, Martin
Pearce, James
Pearce, Michael
Peck, Debra
Peregrinus, Sai
Peters, Josh
Peterson, Ben
Phillips, Donnarae
Phillips, Kimberlee
Pink Cross Foundation
Place, Mike
Plume Lover
Pshenichkin, Alexandr
Raethel, Justin
Reid, David
Rhoton, Tony
Richards, Dennis
Richards, John (BYU)
Richards, Justin
Richards, Phil - ind (2)
Richardson, Amy & Bryon
Richardson, Lorilee
Richey, Manuel
Richman, Larry
Riggs, Christian
Rinehart, Peggy
Risenmay, Matthew Allan
Robbins, Rebekah
Roberts, Richard
Robertson, Paul
Robinson, Danette
Robinson, Robert
Romo, Rod
Rose, Kim
Rots, Edwin
Rotzien, Trevor
Rowley, Ken
Sadowsky, George
Salisbury, Jennifer

Salisbury, Joshua
Sanchez, Alex and Ellen
Saphron
Sater, Garth
Scheve, Jennifer
Scott, D. Jay
Scutcher, Chris
Sheridan, Jacob
Siler, Janna
Sistemas A Medida
Skillings, Chris
Smart, Allan
Smart, Denise
Smith, Bob
Smith, David
Smith, Jim II
Souzado, Doug (2)
Staker, Mauri
Stapleton, Cynthia
Steele, Jonathan
Stephens, David & Sherrie
Stewart, Jared
Strayer, Jon
Street, Mike
Swanson, David
Swift, Jesse & James
Swim, Michelle
Tasker, Ben
Tate, Corey - ind
Terry, Steve
Thesing, Stephen
Thorpe, Andrew
Thorsen, Norman
Tibbitts, Nan
Titus, Aaron
Tomlinsno, Peter
Tria, Michael
Turmes, Joe
ul-Haq, Naveed
unidentified ("enquiries")…
United Familes Utah
United Families Utah - Bunker, Laura
Valavanis, Stelios
Van Couvering, Antony
VanKeirsbelk, Cyril
Vertac, John

Wagner, Christopher
Wainwright, Brandon
Walker, Julia
Wall, Yvonne
Walli, Don
Wallin, Katherine
Wambsganss, Leigh - ind (2)
Warburton, Jennifer Earnshaw
Wargo, Damian
Weber, Jennifer
Whitaker, Roger
Whiteley, Jonathan, Maureen, Vanessa, Anna & Jenny
Wiederhold, Curtis
Wiesman, Andrew
Williams, Jeffrey
Wills, Chris
Wilson, Chris
Wolf, Kevin
Wood, Nick
Wyatt, Randy
Yarro, Ralph
Yarro, Ralph (2) repeated
Zundel, Bonnie