

**Before the Senate Committee on Commerce, Science & Transportation
United States Senate**

Hearing on “Protecting Children on the Internet”

**Statement of Christine N. Jones
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Introduction

Good morning Mr. Chairman and Members of the Committee. I am Christine Jones, General Counsel and Corporate Secretary of The Go Daddy Group, Inc.

Background

The Go Daddy Group, Inc. consists of eight ICANN Accredited domain name registrars, including Go Daddy.com. We have over 22 million domain names under management, and are the number one domain name registrar in the world. GoDadd registers a domain name every two seconds or less. Go Daddy is also a large hosting provider.

A domain name registrar serves as the point of entry to the Internet. For example, Chairman Inouye, if you wanted to register the domain name www.ChairmanInouye.com, you could go to www.GoDaddy.com to register that domain name. A domain name registrar is different from a traditional Internet Service Provider (ISP), such as AOL, MSN, or EarthLink. The ISP provides *access* to the Internet whereas the registrar provides the *registration* service for .com names and the like. In short, in exchange for a fee, the ISP provides the means by which an Internet user connects to the Internet via a dial-up connection, cable modem, DSL, or other connection method. A registrar, on the other hand, enables Internet users to establish a web presence by registering a unique name such as www.ChairmanInouye.com.

Once www.ChairmanInouye.com is registered, you would need to build a website and find a place to store, or “host,” that website. Again, you could go to www.GoDaddy.com for storage, or hosting, services. A hosting provider differs from a traditional ISP in that the hosting provider supplies space on a computer that is accessible from the Internet rather than access to that computer which is provided by the ISP.

How Go Daddy Deals With Online Child Predators

The Go Daddy Group devotes considerable time and resources to working with law enforcement to preserve the integrity and safety of the Internet by quickly closing down websites and domain names engaged in illegal activities. We work with law enforcement

agencies at all levels and routinely assist in a wide variety of criminal and civil investigations. We are also quick to respond to public complaints of spam, phishing, pharming, and online fraud and work closely with anti-fraud and security groups such as the Anti-Phishing Working Group, Digital Phish Net, the National Center for Missing and Exploited Children, and CyberTipLine. Go Daddy has made it a high priority to use its position as a registrar to make the Internet a better and safer place. It is also a priority for me personally.

My staff routinely investigates and suspends sites involving child pornography and exploitation of children in many forms and degrees of severity. These include, but are not limited to, the following: 1) sites depicting children of both genders engaged in sexual acts with adults or other children; 2) sites depicting children nude or exposing inappropriate areas of their bodies; 3) sites advertising, advocating, or promoting sexual relations with minors; and, 4) sites with false or altered images depicting children in various sexual situations. Our investigations have also uncovered sites containing photographs, videos, and text descriptions; children depicted in a sexually solicitous manner; sites that claim only to be "nudist" sites, but include pictures of naked children; and, even cartoon images depicting sex acts with infants and small children. We take each instance seriously and devote high priority attention to ensuring such websites are removed from our network, as described in more detail below.

The Domain Name Registration Process

The domain name registration system is entirely automated. There is no human intervention into the process. Because many words have multiple meanings and combinations of words can be used for both legitimate and illegitimate purposes, no domain names are automatically prohibited from registration. As mentioned above, Go Daddy registers a domain name once every two seconds or less. This makes it virtually impossible for a human being to verify the legitimate use of every domain name registration, particularly on an ongoing basis. To compensate for this, we have developed a notification system for reporting instances of all types of network abuse, including child pornography (hereinafter, "CP"), to our Network Abuse Department.

The Notification Process

With over 22 million domain names under management, most of our data come from third party complaints or notices. The Go Daddy Network Abuse Department can receive information that a CP site may be residing on our network in several ways: 1) direct complaint from a third party via email; 2) direct complaint via telephone; 3) tip from Go Daddy employees who have either become aware of, or suspect the existence of, CP on a customer site; and, 4) notifications from CyberTipLine and other "watchdog" groups.

The Investigation Process

Once Go Daddy is made aware that a potential CP site is registered through Go Daddy, we immediately investigate to determine whether there is CP content, and if so, whether that customer has other domain names resolving to the site with the CP content, and whether there are other hosting sites in the customer's account which contain CP content.

In many cases, Internet users can only access CP content by supplying a paid-for membership user name and password. While we cannot investigate content that requires payment to access, we do investigate all web pages found to be freely accessible to Internet users without a user name and password for any site that we suspect may be involved in CP. If the site is hosted by Go Daddy, we may also access content directly in the customer's hosting account to ensure we eliminate all CP content. Often, the operators of web sites of a pornographic nature are guarded about images on publicly accessible landing pages and store the most offensive content in directories that site visitors can only reach with payment.

After we determine that there is content meeting the criteria for classification as CP, we archive a screenshot (in the case of a registered domain) and all or partial content (in the case of a hosted site) sufficient to demonstrate evidence of CP for future use in law enforcement investigations.

The Reporting Process

Once Go Daddy's investigation is complete, we report the offending domain names, web sites, and registrant information to law enforcement. We give law enforcement a short time period to request that we leave a web site in tact to assist in their investigations. This allows authorities to expeditiously gather screenshots, downloads, WHOIS data, and other information necessary for further investigation. We also report the offending domain names, web sites, and registrant information to the National Center for Missing and Exploited Children (NCMEC) via their online submission and complaint area, CyberTipLine.

The Suspension Process

After the offending domain names, web sites, and registrant information have been investigated and reported, we permanently suspend our services. It is important to note that domain names are not suspended prior to the investigation and reporting processes, especially where domain names are not associated with an active web site. It is very difficult for us to suspend a domain name before it is associated with an active web site because many words have multiple uses. And, if there is no CP content associated with a particular domain name, there is no reason to suspend the domain name itself because there is nothing unlawful about a domain name, in and of itself.

How Go Daddy Deals With Private Domain Name Registrations

Go Daddy offers privacy services for domain name registrations. A private domain name registration is recorded through a proxy registrant. This enables a domain name registrant to avoid publication of their personal information in the public WHOIS data base. We find that most of the users of the private registration service are legitimate users; bad actors typically do not want to pay extra to hide their WHOIS data when they are probably going to provide false WHOIS data, anyway. Most CP sites do not have privacy protection on them. More often, the registrant simply provides false, but valid looking, WHOIS data, upon registration.

The registration process for a domain name is exactly the same regardless of whether the customer chooses to enable privacy. While we do not have different rules for registering a domain name with privacy, we do use our Universal Terms of Service broadly to cancel privacy when the Go Daddy Abuse Department determines it is being used for ANY improper purpose. Go Daddy also gives law enforcement the proxy registrant information on private domain name registrations when they are investigating a domain name with privacy. In the case of a CP site, this information is voluntarily provided to law enforcement during the notification process described above.

Child Pornography Statistics

Go Daddy investigates thousands of domain names and web sites each year for CP. The number of unique customers investigated in the past twelve months was approximately 1,500. (This number does not include the child modeling sites discussed below which are growing in numbers daily.) The number of domain names investigated each year is much higher than the number of unique customers investigated. One unique customer may have many domain names in one account. Once we find out about potential CP in a customer's account, we look to determine what other products they may have associated with CP. Many times, one customer will have literally hundreds of domain names on account. In those cases, we suspend ALL the domain names with CP, not just the one upon which we received a complaint or notification.

Importantly, these numbers are skewed slightly lower because many times when Go Daddy is the registrar, but not the hosting provider, the web site content has already been removed by the hosting provider by the time we conduct our investigation. This is a result of third party complaints being sent to both the domain name registrar and the hosting provider at the same time. This is a sign that many hosting providers take complaints of CP as seriously as we do and we are, of course, grateful when we find that they are fully cooperating with us to rid the Internet of CP content.

Approximately 70% of the sites we suspend are registered, but not hosted, with Go Daddy. This means that in about 70% of the investigations we conduct, we find that the

web site content itself is stored by another hosting provider and Go Daddy provides the domain name registration service only. Approximately 80% of the CP web sites we investigated in the past year were registered to an individual or company in Eastern Europe. The most common areas were Russia, Ukraine, and Romania. Importantly, the majority of CP sites we investigated in the past twelve months were registered fraudulently. This makes identifying the exact nation of origin difficult, and brings into question the reliability of numbers we collect.

How Go Daddy Deals With Child Modeling Web Sites

Much like CP web sites, we routinely investigate and suspend sites involving child modeling. These include, but are not limited to, the following: 1) images of underage children posing in a manner intended to be explicitly sexy. (e.g., emphasizing genital areas or posing in situations easily identified with sex); 2) images of underage children in adult lingerie; and, 3) images of children in states of partial nudity or very little clothing not associated with normally acceptable situations. Images of a child in a bikini swimming at a pool would not be considered. Images of the same child in a thong bikini laying on a bed and spreading her legs would be.

As these sites typically do not rise to the level of technical CP, we classify these sites as "morally objectionable," a term taken from our Universal Terms of Service. We tend to be more aggressive than most registrars on child modeling sites. We typically remove them, even if we can't find CP, because our experience has been that the operators of child modeling sites tend to be associated, even if attenuated, with CP in some way. We also remove the non-traditional forms of CP like nudist sites and cartoon CP.

The Domain Name Registration Process

While there is no prohibition against registering a child modeling domain name (because there is nothing illegal about the domain name itself), we do treat child modeling web sites in a manner similar to CP sites. We have seen child modeling sites with more and more frequency over the past year. Almost every time we find a child modeling site, we learn that the customer has multiple domain names specializing in child modeling. We

also find that a customer who runs child modeling sites typically also has CP on its site somewhere, or that the child modeling sites lead, even if circuitously, to CP on another site the customer controls somewhere. Based on our investigations, we have found that the vast majority of these sites are of little girls.

The Notification Process

All child modeling web site investigations originally come in as notification of alleged CP (as described above) by third parties or employees. When we are notified of a child modeling site, it is transitioned to a child modeling investigation as soon as it is discovered to be a child modeling site not containing explicit pornography.

The Investigation and Reporting Process

We follow nearly the same procedure for child modeling sites as described for CP investigations. Because the child modeling sites fall squarely under the charge of the NCMEC, as they are clearly exploiting children, these sites are also reported to the NCMEC.

The following example demonstrates the importance of all ISPs, registrars, and hosting providers taking child modeling sites seriously. One child modeling investigation we conducted recently uncovered a registrant engaged in CP. We discovered this particular customer had over 200 domain names attached to active child modeling web sites. After following our standard investigation procedures, Go Daddy submitted their information to authorities. Two weeks later, this customer was arrested and indicted on multiple counts of CP. This is just one of many examples of a direct link between information we have provided and arrests for CP.

Child Modeling Statistics

We investigate thousands of domain names and web sites each year for child modeling. The number of unique customers investigated in the past year was approximately 780. As with CP, the number of domain names investigated each year is much higher than the number of unique customers investigated. This is because one unique customer may

have many domain names in one account. Many times, one customer will have literally hundreds of domain names in its account. In those cases, we suspend ALL the child modeling domain names, not just the ones upon which we received a complaint or notification.

Approximately 60% of the sites we suspend are registered, but not hosted, with Go Daddy. This means that in about 60% of the investigations we conduct, we find that the web site content is stored by another hosting provider and Go Daddy provides the domain name registration only. This statistic might tend to suggest that child modeling operators are more comfortable using the services of a mainstream hosting provider than those who engage in pure CP, although we have no independently verifiable data to support that suggestion. Approximately 60% of child modeling web sites we investigated in the past year were registered to an individual or company overseas, typically in European countries. Unlike with full blown CP, approximately 40% of child modeling sites we investigated and suspended in the past twelve months were registered to an individual or business in the United States.

Conclusion

Thank you, Chairman Inouye, for the kind invitation to testify today regarding protecting children on the Internet. We are grateful for this Committee's attention to this important issue and for recognizing that the problem of online exploitation of children generally, and child pornography specifically, is a growing and unacceptable menace that must end. Go Daddy is committed to taking whatever steps are necessary and feasible to assist in ending this practice, and we would challenge our counterparts on the Internet to make the same commitment.