Loopt, Inc.
www.loopt.com
590 W. El Camino Real
Mountain View, CA 94040

October 17, 2008

Re: Internet Technical Safety Task Force Submission

To Whom It May Concern:

Loopt is a proud member of the Internet Technical Safety Task Force. It has been an honor to participate in this undertaking with our industry colleagues, the several online safety and privacy non-governmental organizations involved, and the entire Berkman Center team including the technical and research advisory boards.

Of particular note were the presentations of the Research Advisory Board during the April 30, 2008 meeting, which were profound and extremely valuable in terms of helping us all move forward in an effective manner to address these issues. Amanda Lenhart (Pew Internet & American Life Project), Janis Wolak (Crimes against Children Research Center), Michele Ybarra (Internet Solutions for Kids, Inc.), and dana boyd (Fellow, Berkman Center for Internet and Society) presented in-depth studies and research that shed light on the complex problems and behaviors intertwined under the umbrella of 'online safety'.

We have learned a significant amount through this process and know that the proceedings over the past year will most definitely result in raising the caliber of online safety solutions. It is clear that industry continues to invest significant resources to address these issues. Loopt has benefited from collaboration with industry peers such as Fox Interactive, Microsoft, Xanga, Facebook, AOL, Linden Lab, Verizon, and AT&T. In addition, the contributions and input of the various online safety and privacy advocacy groups have been invaluable, including Connect Safely, Progress & Freedom Foundation, Center for Democracy & Technology, Enough is Enough, WiredSafety, and Family Online Safety Institute.

We would like to thank MySpace (Fox Interactive) and the 49 State Attorneys General for putting together this group, as well as the Berkman Center team for deftly handling the process. Finally, we hope that the members of this task force will consider continuing our work together in a similar manner into the next year and beyond.

Sincerely,

Brian R. Knapp
Vice President, Corporate Affairs
Chief Privacy Officer

ABOUT LOOPT. Loopt is based in Silicon Valley and backed by leading venture capital firms, Sequoia Capital and New Enterprise Associates. Loopt has created an interoperable and accessible "social mapping" service that is available across multiple carrier networks and supported on over 100 mobile devices. Loopt shows users where their friends are and what they are doing via detailed, interactive maps on their mobile phones. Loopt helps friends connect on the fly and navigate their social lives by orienting them to people, places and events around them. Users can also share geo-tagged photos and comments with friends in their mobile address book or online in social networks, communities and blogs. Loopt was designed with user privacy at its core and offers a variety of effective and intuitive privacy controls. **www.loopt.com**

I. OPT-IN, PRIVACY CONTROLS.

Opt-in Consent. Loopt is 100% permission-based; express, informed opt-in consent is received from every subscriber. Each subscriber must proceed through a multi-step registration process, during which they are presented with key information about the service and several ways to review Loopt's end user agreements.

Mobile phone number-based Accounts. Every Loopt account is tied to a single, valid and authenticated mobile phone number, which number cannot be later modified for that particular account or device.

Notification Program. Following registration, an automated "reminder" notification program reminds users that Loopt is now installed on their mobile device, and contains key messages about using the service responsibly. These notifications are delivered at random intervals via SMS (short message service) or device-based push notification during the first ten days following registration.

Closed Networks. Loopt subscribers only share exact location on the Loopt Friends Map with established friends. To initiate a friend request, a subscriber must already know the other user's mobile phone number. Even when a Loopt friendship request is successfully delivered, the prospective friend must consent to a *reciprocal* "friendship connection" before any map-based location sharing will occur.

Privacy Controls. Loopt offers several intuitive, powerful and effective end user privacy controls.

- *Controlling Loopt Friend Connections*. Subscribers may immediately "hide" from sharing information or "block" profile access on a friend-by-friend basis, or from all Loopt friends at once using the one-step "Hide All" function. In addition, subscribers may delete or terminate friendship connections permanently at any time.

- *Report Abuse*. Report Abuse links are posted near every subscriber profile. Loopt's powerful "Report Abuse" feature, as provided in the Loopt Mix service, offers users the ability remove their profile from future viewing by specific users, and terminates any in-progress messages or communications between the abuse reporter and those reported-users. In addition, Loopt's customer service and privacy-response team reviews all Report Abuse messages and responds appropriately according to internal process standards and Loopt's publicly-posted Terms of Use (available at **https://app.loopt.com/loopt/termsOfUse.aspx**).

- *For Parents*. Parents or guardians may delete their minor child's Loopt account altogether, at any time, by contacting Loopt customer service by phone or email.

Privacy Notice. Loopt's Privacy Notice is readily viewable on mobile devices and online, and may be received by email delivery or postal mail. Loopt is *TRUSTe*® certified. Loopt will not disclose subscriber information to third parties for marketing purposes, unless the particular subscriber has opted-in to be part of a specific program or feature in accordance with the applicable Loopt consent procedures. (Privacy Notice, available at **https://www.loopt.com/loopt/privacyNotice.aspx**)

II. USER EDUCATION, DISCLOSURES.

FAQs, User Agreements. Loopt's end-user agreements (Terms of Use, Privacy Notice) are readily available at the Loopt Web site, within Loopt's mobile application, and can be delivered to users by email or postal mail. In addition, Loopt's Web site contains detailed information about our privacy and security features, as well as Frequently Asked Questions.

Safety, Privacy Tips. Loopt's Web site offers educational "tips" for both subscribers and parents to encourage informed, responsible usage.

User Education. Loopt takes advantage of "teachable moments" during the user experience in order to remind users about responsible and effective usage. For example, prior to permitting the acceptance of any Loopt friendship request, a pop-up notice screen is displayed to remind the user to confirm the legitimacy of the particular friendship-connection request.

III. CUSTOMER SERVICE, COMPLAINTS.

Privacy, Content Complaints. Loopt promptly addresses customer complaints or concerns regarding security, privacy, or content with a well-trained, in-house customer service team. Loopt customer service representatives are trained to anticipate misuse situations and empowered to immediately suspend questionable accounts. Any challenging situations are escalated to Loopt executives and promptly discussed among the operations team.

Terms of Use Violations. Loopt will promptly notify, suspend, or permanently ban users who violate Loopt's community policies and regulations including the posting of inappropriate content or the harassment of other subscribers.

Customer Service. Loopt accepts complaints about harassment, unwelcome contact, and inappropriate content via phone (during normal business hours) and email. Customer service contact information is clearly and prominently highlighted on the Loopt Web site and within the Loopt mobile application.

IV. BACKGROUND TECHNOLOGY.

Mobile Application Security. To prevent "spoofing" of a mobile phone number with the main server during subscriber registration, Loopt verifies the mobile phone number via a background SMS "handshake" with the applicable Loopt mobile application. This "handshake" acts to verify and authenticate that the registering subscriber has custody of that particular handset with the mobile phone number indicated during registration.

Application Time-outs. Loopt automatically logs-out subscribers and puts them into a "disabled" state after certain periods of non-usage are detected by our systems. To reactivate their profile, subscribers must log back into the Loopt mobile application.

Age Limits. Loopt's Terms of Use includes a minimum age requirement, currently set at 14 years of age. Loopt has implemented an "age-neutral" screening mechanism in its subscriber registration flow, which requires – in a neutral fashion – users to input their age and rejects users who do not meet the minimum requirement. Loopt tags the mobile device of such unsuccessful registrants and prevents those prospective members from re-registering from the same device. This screening mechanism works in accordance with the FTC's guidance with regard to COPPA compliance. In addition, parents and guardians may contact Loopt to terminate accounts of underage subscribers.

Background Monitoring. Loopt has implemented pattern monitoring to better identify non-legitimate users and potential misuse cases. These monitoring tools allow Loopt to enhance its privacy controls and customer-service response levels.

V. COOPERATION & POLICY OUTREACH.

Our accomplishments to date in terms of privacy and security innovation would not have been possible without the great work and insights of several key NGO partners. The expertise and know-how of these organizations makes ongoing collaboration with them a critical business practice for Loopt. Loopt is a member of the CTIA's WIC Leadership Council, and actively participated in the creation of the "*CTIA LBS Best Practices*". Loopt has also had discussions with dozens of congressional staff (Commerce, Judiciary

committees), FCC staff and commissioners, and FTC staff to help these individuals better understand our service and policies, and to solicit feedback.

Among other activities, Loopt's policy executives regularly participate in public forums to discuss these matters of online safety and privacy, including:

- Panelist; *Family Online Safety Institute's Annual Conference '07*
- Exhibitor; *State of Net '08, Advisory Committee to the Congressional Internet Caucus*
- Panelist; *2008 Cyber Safe California, California Office of Privacy Protection*
- Panelist; *Roundtable on Wireless Innovations, Tech Policy Summit '08,*
- Panelist; *Federal Trade Commission's Mobile Commerce Town Hall '08*
- Panelist; *The Focus on the Locus, Columbia University Institute for Tele-Information*
- Participant; *Kids, Media & Marketing Roundtable, Progress & Freedom Foundation*
- Panelist; *Online Safety Solutions Roundtable, Family Online Safety Institute*

In addition, Loopt is involved with leading mobile, social networking, and online privacy and security organizations such as the Family Online Safety Institute, Center for Democracy & Technology, Cyber Safe California, ConnectSafely.org, Congressional Internet Caucus Advisory Committee, Electronic Frontier Foundation, and the Progress & Freedom Foundation's Center for Digital Media Freedom. Loopt also works with the Community Concerns division of the California State PTA, which organization serves nearly one million local PTA members in California.

VI. LAW ENFORCEMENT COOPERATION.

Law enforcement cooperation is a critical part of Loopt's approach to online safety. Loopt has developed a thorough "Information Requests" policy, which has been made available on AskCALEA.net, and is otherwise available upon request. This policy describes for law enforcement the type of information available and the process by which law enforcement may lawfully request it. Loopt maintains a dedicated toll-free phone number and email address for law enforcement request purposes.