

**COVER SHEET**

**Microsoft comments on the first assessment of the EU Safer Social Networking Principles (herewith after 'the Principles') as signed by Microsoft on 17 April 2009**

Name of Organisation	Microsoft Corporation
Identification Number in the European Commission Register of Interest Representatives	0801162959-21
Address	Avenue des Nerviens 85 B-1040 Brussels Belgium
Contact Persons	Dr. John Vassallo Vice President European Affairs and Associate General Counsel Tel: +32 (2) 704 30 00 <a href="mailto:jovassal@microsoft.com">jovassal@microsoft.com</a>  Cornelia Kutterer Senior EU Policy Manager Tel: +32 (2) 704 3926 <a href="mailto:cokutter@microsoft.com">cokutter@microsoft.com</a>

**Microsoft comments on the first assessment of the EU Safer Social Networking Principles (herewith after ‘the Principles’) as signed by Microsoft on 17 April 2009**

We welcome the opportunity to comment on the assessment results against Microsoft’s self-declaration of 17 April 2009, which outlines how we have considered the Principles to apply to our services Xbox LIVE and Windows Live.

Microsoft commends the European Commission’s leadership in making the Internet a safer place for children. We share that same commitment and are directly supporting many of the efforts undertaken and encouraged by the European Commission.<sup>1</sup> We also share the view that online safety necessitates a holistic approach that includes strengthening the public policy, empowering law enforcement and NGOs and deploying technology tools to achieve greater levels of safety.<sup>2</sup> In short, partnership is an imperative for a safer Internet.

While this overall exercise was focused on social networking services (SNS), it is important to note that Microsoft does not offer a singular SNS offering, but rather Windows Live offers an entire suite of interconnected products and services with a number of SNS-like features. Similarly, Xbox LIVE offers an online gaming and entertainment service that includes social networking features. We therefore approach privacy and safety issues across the range of our products with our primary goal of promoting awareness and providing guidance for the users of these broad set of products and services. As such, our approach is different than pure social networking services - we place robust safety information on the highly-trafficked Microsoft corporate website, known as our “Protect” site as well as on Xbox.com. These sites have been localized for dozens of countries around the world, many of those across Europe. So, Microsoft believes that embracing and valuing these varied approaches to consumer education based on different business models and product sets will be an important consideration going forward.

We are strongly committed to supporting the Principles and are pleased that the findings of the EC’s assessment of our services with social networking features has that Microsoft’s self-declarations for Windows Live and Xbox LIVE are in compliance with the Principles. However, the assessment finds that neither Windows Live nor Xbox Live fully comply with our self-declarations. We respectfully disagree with the assessment and maintain we are in full compliance with our self-declaration. Further, Microsoft generally appreciates any feedback on our services as we view improving the safety of our products and services as a continuous journey. This feedback is equally important to continue innovating and developing our services to the benefit of our customers to meet the continuous evolution of consumer expectations. In this context, it is important to mention that ‘safety by

---

<sup>1</sup> Some of the examples include the long-term partnership with European Schoolnet and the expanding cooperation with the European INSAFE network, our sponsorship for the European Youth Panel, and many other initiatives, partially listed in our self-declaration.

<sup>2</sup> Microsoft also supports INHOPE’s mission in combating illegal content on line and is actively involved in the Financial Coalition funded by the Commission. Microsoft works closely with the National and International Centers for Missing and Exploited Children (ICMEC, NCMEC) as well as Interpol, in helping to train global law enforcement personnel investigating computer-facilitated crimes against children. Microsoft’s Child Exploitation Tracking System (CETS) assists police officers in six countries around the world in investigating child pornography on the Internet. Other software developments in the context of fight against child abuses have recently been announced.

design' requires decisions during the developing process that need to remain open and neutral to ensure innovative safety improvements at early stages of the development of software.

Through the assessment process we have revisited our current safety policies, processes and procedures and believe our practices serve the needs of our customers. This exercise has also stimulated vibrant and important internal discussion about how we can continually work towards improvements. Going forward, we will periodically update the self-declarations as our products and services continue to evolve and also hope the Commission in future assessments will consider the varied nature of services offered that include social networking features as well as pure social networking sites. We look forward to working with our industry partners and the Commission to achieve even greater levels of transparency in this space.