

## **CARU RECOMMENDS MODIFICATIONS TO MY MOST WANTED WEBSITE**

*Operator Revises Site to Comply With CARU's Guidelines, COPPA*

*New York, NY – March 12, 2008* – The Children's Advertising Review Unit of the Council of Better Business Bureaus has recommended that My Most Wanted, the operator of the Website [www.mymostwanted.com](http://www.mymostwanted.com), revise the site to comply with privacy protections outlined in the CARU guidelines and the federal Children's Online Privacy Protection Act (COPPA). The advertiser has taken steps to do so.

The Website, [www.mymostwanted.com](http://www.mymostwanted.com), administered by My Most Wanted came to the attention of CARU, the children's advertising industry's self-regulatory forum, through CARU's routine monitoring of the Internet.

CARU monitors Websites for compliance with CARU's Self-Regulatory Program for Children's Advertising, which includes guidelines on Online Privacy Protection, as well as with COPPA.

The Website featured pictures, news information and discussion forums for an array of current television and pop stars. Visitors could view the celebrity galleries and gain complete access to the forums after entering information that included a user name, password, e-mail address and time zone information. Potential members could check a box if they wanted to receive email either from administrators, other members, or both.

There was no age-screening performed to determine the ages of the visitors, nor was any parental contact information or consent requested at any point during the sign-up process. The Website's forum rules expressly stated that it was impossible for the Website's monitors to review all posted messages.

When CARU first examined the Website, the privacy policy did not contain any contact information for the site operator, as required by both the Online Privacy Protection section of CARU's guidelines as well as COPPA. Further, [www.mymostwanted.com](http://www.mymostwanted.com) appeared to contain hyperlinks to Websites that did not comply with CARU's Guidelines. According to CARU's guidelines, Websites should not knowingly link to sites that are not in compliance with the guidelines.

Upon receiving CARU's initial letter, MMW agreed to revamp the Website's privacy protections.

MMW immediately incorporated a neutral age screening process to determine the ages of those seeking to register. Under the terms of the site's new policy, children under 13 will not have access to the registration-required portion of the site until an acceptable and approved parental-consent form is received. If a parent refuses to allow the child's registration and entry, MMW will delete the child's information from the database. If the Website does not hear back from the parent, MMW will assume that it is not acceptable for the child to be registered.

MMW asserted that it is creating a revised privacy policy, which will clearly explain the types of information they are collecting. MMW supplemented the privacy policy

with the required contact information including name of Operator, telephone number, address and e-mail address. Additionally, MMW confirmed that it has removed from age-restricted areas of the Website all links to sites that do not comply with CARU's guidelines.

CARU noted in its decision that it looks forward to reviewing the updated Website, complete with the new privacy protections including prior verifiable parental consent for registration and a comprehensive privacy policy containing all required information.

The company, in its advertiser's statement, said it is "grateful to CARU and appreciate their recommendations, assistance, and time spent working with us. We are pleased that we were able to utilize the self-regulation process. We fully support CARU's goals and are committed to make our website fully compliant with federal law and the CARU *Guidelines*."

**CARU's inquiry was conducted under *NAD/CARU/NARB Procedures for the Voluntary Self-Regulation of National Advertising*. Details of the initial inquiry, CARU's decision, and the advertiser's response will be included in the next *NAD/CARU Case Report*.**

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**About advertising self-regulation:** The National Advertising Review Council (NARC) was formed in 1971 by the Association of National Advertisers, Inc. (ANA), the American Association of Advertising Agencies, Inc. (AAAA), the American Advertising Federation, Inc. (AAF), and the Council of Better Business Bureaus, Inc. (CBBB). Its purpose is to foster truth and accuracy in national advertising through voluntary self-regulation. NARC is the body that establishes the policies and procedures for the CBBB's National Advertising Division (NAD) and Children's Advertising Review Unit (CARU), as well as for the National Advertising Review Board (NARB) and the Electronic Retailing Self-Regulation Program (ERSP).

NAD and CARU are the investigative arms of the advertising industry's voluntary self-regulation program. Their casework results from competitive challenges from other advertisers, and also from self-monitoring traditional and new media. The National Advertising Review Board (NARB), the appeals body, is a peer group from which ad-hoc panels are selected to adjudicate those cases that are not resolved at the NAD/CARU level. This unique, self-regulatory system is funded entirely by the business community; CARU is financed by the children's advertising industry, while NAD/NARC/NARB's sole source of funding is derived from membership fees paid to the CBBB. ERSP's funding is derived from membership in the Electronic Retailing Association. For more information about advertising self regulation, please visit [www.narcpartners.org](http://www.narcpartners.org).