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Freedom & Responsibility In The Decent Community: Community Networks And The Communication Decency Act

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Abstract
Discusses the possible implication of the contents of the
Communication Decency Act of 1996 to community networks and on-
line providers. Policing of web sites; Disclaimers in the web sites;
Community networks providers responses on issue of decency.

ARTICLE

Immodest words admit of no defense," wrote the Earl of Roscommon, "For
I want of decency is want of sense." Decency was an ideological imperative
JL. long before he wrote those words in the seventeenth century. Indecency was
indefensible; at least it was indefensible according to hegemonic groups, who maintained
power by constructing threatening acts as indecent, nonsensical, illogical, and
criminal. But eventually other ideological imperatives rose to confront this construction
of indecency. Freedom of expression was one challenger. Free speech required
that even indecent acts be permitted. To control expression, another ideological imperative
was paired to freedom: responsibility. In this new articulation, free yet "responsible"
expression would be decent, maintaining order and control in the community.

This equation was challenged in the 1990's by the new medium of the Internet.
Supporters proclaimed the Internet to be the Promised Land of completely free
expression, where *Playboy* could profitably coexist with participatory democracy. Amidst
rising fears that the Internet would become a source of indecent materials flooding
into the homes and young minds of the community, the federal government enacted
the Communication Decency Act (CDA).

Even though it was short-lived, certain groups had to pragmatically deal with the CDA at a local level. These community networks attempted to maintain decency in their local community through practical, concrete measures. In the steps they took we can see how the ideology of decency in the community was shifted by the response to the CDA. For embedded in these practical, "commonsensical" acts was a new articulation of freedom, responsibility, decency, and community. I will begin by denning community networks and outlining how the CDA affected them. Drawing upon an examination of their webpages, I will detail what the community networks did at a practical level in response to the CDA. Finally, I will lay out how those webpages and the private communication I received from community network organizers constituted a reconfiguration of our ideology of the decent community.

DEFINITIONS AND ISSUES

For most people, the significant impact of the Internet is its virtual erasure of the boundaries of space. Yet some people believe the Internet can be used for the opposite purpose: to rebind people to their local communities. These people are the organizers of community networks. Community networks (CNs) come in a variety of configurations, but essentially they are local content and Internet access providers. Three terms are crucial to this definition: local, content, and access. First, CNs are locally oriented, tied to a particular town or region. With names such as Tallahassee Free-Net, Boulder Community Network, and La Plaza de Taos, CNs make it clear that their focus is on a place-bound community. The content on CNs is also local: information about local organizations, advertisements by local businesses, and announcements by local individuals fill the websites. Some CNs provide original content that addresses issues of local significance, but most provide links to other sources of information. Finally, CNs provide access to the Internet for local residents. Some provide free access, others very low cost; some provide full Internet access, others only text-based; some CNs put terminals in libraries and other public places, others provide no public access terminals. But all are committed to providing access to as much of the Internet, for as many of their local community members, as their resources allow.

Obviously, CNs are not in the business of distributing child pornography, so at first glance it would seem that the CDA would have little or no impact on their operation. Yet portions of the CDA made it possible for on-line services to be held responsible for the content that passed through their system. The Computer Professionals for Social Responsibility (CPSR) provided the following example of the impact of the CDA:

> The Seattle Community Network is run as a free, public-access computer system
> for the public benefit. SCN currently provides service to over 6,500 users.
> If a SCN user posted a message on an SCN forum or from SCN that was
> deemed to be "indecent", SCN could be fined $100,000 under the new legislation!
> On top of that, SCN's board of directors and staff could also be eligible
> for 2-year prison sentences. Pretty strong punishment for setting up a public
> computer network! (Schuler, 1997)

The CDA, according to its opponents, would unfairly burden community networks and on-line service providers. Online system operators would have to police all content on their sites. While automated scanners could catch and block "indecent" messages and other textual content, they cannot check graphic files—the very files most likely to be deemed indecent. The end result, opponents argued, was that the bill would seriously threaten the very existence of community networks. If someone wanted to put a CN out of service, they could simply upload an offensive picture, wait a few days, and then have someone else "find" the file and turn the CN in to the authorities (Evoy, 1997).

The language of the CDA demonstrated the bill-writers' unfamiliarity with the Internet. Technically speaking, the bill protected Internet providers from prosecution if they were simply providing access:

> (1) No person shall be held to have violated subsection (a) or (d) solely for providing access or connection to or from a facility, system, or network not under that person's control, including transmission, downloading, intermediate storage, access software, or other related capabilities that are incidental to providing such access or connection that does not include the creation of the content of the communication. (Text of proposed, 1997)

But this defense was undermined by language in the bill that required Internet service providers "to restrict or prevent access by minors to a communication specified in such subsections, which may involve any appropriate measures to restrict minors from such communications" *(Text of proposed,* 1997). Opponents of the bill argued that the CDA transformed CNs from access providers into access police, forcing them to take restrictive measures to avoid prosecution.

Community network organizers and other opponents believed that the CDA curtailed their freedoms of speech and privacy. The Internet, which many touted as "a potential platform for participatory democratic discourse," would be turned "into an electronic police state" (Schuler, 1997). Despite their protests, the bill did pass, though it was quickly struck down as unconstitutional by the Supreme Court. The CDA's short life, as well as the political climate that fostered it, prompted a variety of pragmatic responses by community networks, which can be seen on their websites.

PRACTICAL RESPONSES TO THE CDA

While community network organizers did not agree with the letter of the CDA, they agreed to some extent with its spirit. CNs were aware of the existence of pornography on the Internet and agreed that children, in particular, ought to be protected from indecency. Thus most took steps to address the danger of users encountering indecent materials. These practical responses took five forms: disclaimers/user agreements, warnings, standards, education, and dismissals/ignorance.

1. Disclaimers/User Agreements

On most community networks, browsers eventually come across a basic liability statement. These disclaimers essentially assert that users or browsers cannot hold the community network liable for anything. For example, the City of Belmont network claims that it "is NOT responsible for the contents of any off site pages referenced or linked to," and posts the following:

> DISCLAIMER OF LIABILITY: With respect to documents available from this server, neither the City of Belmont nor any of its agencies and affiliates nor any of their employees, makes any warranty, express or implied, including the warranties of merchantability and fitness for a particular purpose, or assumes any legal liability or responsibility for the accuracy, completeness, or usefulness of any information, apparatus, product, or process disclosed, or represents that its use would not infringe privately owned rights. *(City of Belmont disclaimer,* 1998)

Typically, a user agreement is paired to the disclaimer. For example, users of the Seattle Community Network (SCN) have to agree to a "Code of Etiquette" to use the system:

1. I will not knowingly engage in illegal distribution practices when posting information. Some examples of illegal distribution are: posting large portions of copyrighted material; posting libelous material; posting material that knowingly aids in a crime; posting credit card number; posting passwords.
2. I will not attempt to gain unauthorized access to SCN nor use SCN to gain unauthorized access to other systems.
3. I have read the SCN disclaimer.
4. I have read and understand the SCN policy statement and agree to abide by it as the governing policy of the SCN.
5. I will read the description of the forum to which I am posting and post only material relevant to its purpose and theme.
6. I will not use the SCN to harass individuals or organizations.
7. I understand that all public material on SCN may be redistributed, subject to copyright laws.
8. Private e-mail may not be redistributed without permission from the originator of the message. *(Seattle Community Network,* 1998)

Disclaimers and user-agreements are found on most systems for two reasons. First, they are simple to implement, as "write once and forget" documents. Once the statements are written and posted, they are presumed to protect the CN. Second, they are easy to enforce. All users must sign a user-agreement, which includes a statement that they read and agreement with the CN's disclaimers. However, disclaimers and useragreements are essentially a defensive act, a minimum approach that does litde more than place a paper-thin shield between the CN and prosecution.

2. Warnings

Comparable to the reactive approach of disclaimers is the slightly stronger tactic of scattering warnings throughout the website. Many networks, in addition to placing disclaimers on their pages, also warn users of the "dangers" of the Internet:

> MAIN cannot censor your access to material nor protect you from information you may find offensive or inappropriate. There are sites on the Internet that carry sexually explicit and other information resources which you may find controversial or inappropriate. The general access to the Internet that MAIN provides necessarily lets you reach such sites, even though they are not on MAIN. *{MAIN disclaimer page,* 1998)

These warnings go a step beyond mere disclaimers, which simply state that the CN isn't responsible for content on the Internet. Warnings, on the other hand, implicitly state that users can encounter "controversial and inappropriate" information on the Internet. In other words, the presumption is that once users wander off the CN, they are risking their morality.

Some CNs go so far as to warn people when they will be leaving the local network. For example, the Naples Free-Net requires its members to place an "exit" graphic next to all links that connect to external networks, along with the following warning: "EXIT means you will leave the Naples FreeNet if you follow these hypertext links. The Naples FreeNet is not responsible for what may be found if you follow them" (Naples Free-Net home page, 1998). Some sites are a bit more subtle, such as ORION, which places small balls in front of each link. A red ball denotes on-site information, while a blue ball indicates that clicking on that link will lead browsers off-site. Regardless of their form, however, these warnings represent a reactive and negative approach to the CDA.

3. Standards

Some CNs go beyond reactive statements and take a pro-active stance toward maintaining decency. These sites emphasize community standards rather than legal disclaimers or warnings. Firmly believing that "it is up to the community network to decide what information is decent" (J. Glaser, personal communication, September 9,1997), a few networks try to do just that. For example, Tallahassee FreeNet stresses that as members of a community, users of the CN "should be respectful of the rights, sensitivities, and sensibilities of others. Tallahassee FreeNet urges its members to exercise tolerance, taste, and judgment in initiating and replying to communications, especially those that are to be posted in public areas" *(Agreement for account,* 1998). The Grand Rapids Free-Net stipulates that content must "conform to community standards (appropriate language, no pornographic information, etc.) as determined by a review panel," and that links on webpages must "only point to GrandNet approved content sources and service providers" *(grandness standards,* 1998).

Though these standards can be ambiguous to the point of impracticality, they do attempt to phrase the issue more pro-actively. Instead of merely warning people of dangers, or protecting themselves from lawsuit, these CNs encourage users to police themselves by calling on community taste. They attempt to deal with decency legislation by defining what people should do, not just what they should not do. This pro-active stance is even more evident in the next response: education.

4. Education

Another pro-active response to decency legislation, besides appealing to community standards, is education. Relatively few sites provide users with information to educate themselves about Internet use, however. LincolnNet, for example, has a section titled "Cyberfiend," where they provide basic principles for parents and kids to follow. The pages were created specifically in response to the "backlash of hysteria" created by the "hugely over-estimated dangers of the web" in the mass media (S. Prescott, personal communication, September 10, 1997), and were intended to counteract the negative press. The information is organized into six categories: EMail "Nettiquette"; Avoiding Trouble Online; Family Internet Rules; Official Internet Contract; General Safety Tips; and Supervising Net Use *(Cybersight,* 1998). These pages attempt to teach responsible Internet usage by offering lists of do's and don'ts, perspectives on the Internet, guidelines for parents to use, safety and supervision tips, and more.

In contrast to the standards approach, which enforces a sometimes undefined sense of community morals, an educational approach provides individuals with the resources they need to understand the Internet well enough to make informed decisions. Few sites however provide this information. The most obvious reason is that providing detailed perspectives on the Internet, and creating educational content, is time-consuming work. Fostering a healthy respect for the potential dangers of the Internet while simultaneously encouraging users to explore the wealth of the Internet is a difficult task. It is far easier to put up a warning or disclaimer, or even ignore the issue.

5. Dismissals/Ignorance

When I asked members of the Community Network mailing list how their CN responded to the CDA, a few people responded that they simply ignored it. Steve Snow, of Charlotte's Web, summed up this perspective candidly:

> In Charlotte NC we didn't do anything in response to the CDA. We thought it was bogus from the start and just ignored it. We don't have any info on our system that would have qualified for censorship under the aegis of the Act anyway, so that made it easy to ignore, (personal communication, September 9,1997)

Such a response may be a bit premature, however. Even as I write this, another bill (S 1482 IS, introduced by Rep. Coats) is making its way through the Senate to outlaw the

distribution of information "harmful to minors."

An even smaller number of people were completely ignorant of the CDA. Carole Klopp, one of the organizers of DANEnet, wrote: "I really wasn't aware of the act you are referring to and find it kind of ridiculous—considering what I can readily find at my local library and pharmacy!" (personal communication, September 11,1997). Since they were unaware of the consequences of the CDA for CNs (that they might be held responsible for the acts of individuals), or for civil liberties in general, they obviously did nothing in response.

As I noted, very few people were unaware of the CDA, but many did dismiss it. The majority of the CN organizers were aware of the CDA, and of the shifting political climate. They recognized that the Internet was rapidly coming under attack, but they did little to pro-actively defend their rights. As I have shown, the webpages of the CNs are full of a variety of practical responses to the CDA. But these responses represent something more: a rearticulation of what it means to be a decent community.

RECONFIGURING THE DECENT COMMUNITY

In the practical responses of their webpages, and in the e-mail they sent me, CN operators also constructed an ideological response. They articulated an identity for CNs in reaction to the CDA, and in this articulation they also redefined what it means to be a decent community. This articulation can be found in the ideographs they used. An ideograph, according to McGee (1980), is a slogan-like term in political discourse that signifies collective commitment. Ideographs are powerful words or phrases that are persuasive because of their lack of definite meaning. As empty signifiers they can be filled with a variety of meanings, used as political slogans they can have persuasive power because of their lack of specificity. In ideographs we see ideology at work. On the webpages of the CNs, four main ideographs are at work: community, decency, responsibility, and freedom. Each ideograph is also surrounded by a cluster of terms which indicate how CN organizers are redefining the term. By studying how these ideographs get redefined and then paired together, we can see how die ideology of the decent community gets altered in response to the CDA.

"Community "

Obviously the word "community" is employed quite often by CN organizers. What is interesting, however, is what words are mentioned in connection with community. When CN organizers mentioned community when asked about the CDA, they most often connected community to one of the following terms: information/access, boundaries/ safety, or control. Essentially, CN organizers argue that their focus is on providing access to local information important to their community. The president of DANEnet drew a distinction between access and responsibility, and said that "we are simply providing

access" to information and the Internet (C. Klopp, personal communication, Sept. 11, 1997). The implication of the emphasis on community as information source is that all local information is decent. As the director of Charlotte's Web noted, "we don't have any info on our system that would have qualified for censorship" (S. Snow, personal communication, Sept. 9,1997). Behind this premise is the assumption that we in our local community are decent and only have decent information; it's only when you venture outside the boundaries that you encounter indecency: "you know of course that there are many web pages out there of questionable content" *(Naples FreeNet Web,* 1998). By setting up "warning signs" at the virtual edges of die websites, CN organizers point out the dangers of "surfing off of the home turf (a wonderful mixed metaphor, courtesy of the Naples Free-Net). The community thus attempts to control its members' use of the Internet through warnings, standards, and boundaries. But most people involved with CNs admit that controlling the Internet is next to impossible, certainly at the global level. Some do think control is possible at the local level, but others believe "diere isn't any way we could possibly monitor or control the content of our site or the Internet and we don't" (C. Klopp, personal communication, Sept. 11,1997).

"Decency"

"Decency" is a non-issue for many CN organizers, since they believe that indecency is "out there" and not "around here." Several people told me that the CDA was the product of a three-sided hysteria: political, media, and public. They argued that the hysteria about indecency made for good demagoguery, but that it was a conflict between national and local governments. As one person succincdy put it, "it is up to the community network to decide what information is decent" (J. Glaser, personal communication, Sept. 9,1997). The media hysteria about indecency was driven by economics, according to several people: pornography makes for good news, even when the statistics are inaccurate and the media "hugely overestimate the dangers of the web" (S. Prescott, per-sonal communication, Sept. 10, 1997). Unfortunately, some members of the community only learn about the Internet through the mass media: "the poorest communities are most susceptible because they have less personal experience to inoculate themselves against the negative emotional appeal of the media" (S. Prescott, personal communication, Sept. 10, 1997). The solution to personal hysteria, however, was also the easiest for CN organizers to suggest: personal experience. They assumed that once people got on the Internet and learned for themselves what was available, the hysteria would die out, and decency would become a non-issue.

"Responsibility"

Not surprisingly, given our litigious society, responsibility for decency becomes a matter of liability and legality on CNs. The webpages are full of disclaimers, policy statements, and warnings that attempt to absolve the local community of any responsibility for the content browsers may come across. When the community denies responsibility, it becomes a private matter, and not community-wide. People who use the community

network are not labeled community members, but "users", private individuals surfing on their own, just like people walking into store or library. Thus, they are personally responsible for the images they may happen to see. And what about those members of community not able to accept personal, private responsibility, i.e. children? Most CNs argue that responsibility falls on the parents:

> Our comments are always the same to any parents. And we usually bring it up before parents do: "Parents are responsible for the actions of their children. Get used to it. If you want to know what your children are getting into, keep up with them . . . . We don't believe we need a law to handle routine parenting responsibilities." We say it a little more friendly [sic] than that, of course. (S. Snow, personal communication, Sept. 10,1997)

In essence, CNs turn the responsibility to protect children into a matter of personal freedom and rights—parents should be in control of their kids, not the government, or even the local community.

"Freedom"

Inevitably when we talk about individual rights we find this final ideograph—freedom. When CN organizers talk about freedom, it is in four related senses: constitutional, individual, under assault, and potentially indefensible. The First Amendment is constantly cited, and the Internet is hailed as the last bastion of free expression, the last hope for the Constitution and participatory democracy. Like most other rights in America today, the right to free speech is consistently constructed as an individual right. Speech (or web browsing, for that matter), according to opponents of the CDA, is an exercise of private individuals, and thus it is individual liberty that is at stake. Web browsers should be able to make choices on the Internet just as they can in a bookstore or library. But according to groups like the Computer Professionals for Social Responsibility (CPSR), this right is attacked by the CDA, which replaces the Constitution with "Constitution Lite" and creates an "electronic police state" (Schuler, 1997) where Internet users must to struggle to secure First Amendment rights. But this struggle may be in vain, some people fear. Too many people are willing to give up their rights: "part of the sad aspect of the current law situation is that you may well have rights that you won't be able to defend because the price is too high. A number of places [networks] simply set their sails to the winds and do the best they can to not offend users within reason" (D.Diane, personal communication, Sept. 9, 1997). In the current political climate, the freedom to browse at will may be indefensible.

Ideographic Pairs

Of course, ideographs do not exist in isolation. They interact with each other. Since this study focuses on the response of community networks to the CDA, I will discuss what happens when community is paired with the other three terms: community/decency, community/responsibility, and community/freedom.

When community is paired with decency, the articulation becomes one of shocked dismay, mixed with a bit of self-righteousness: of course people around here are decent; we know what decency is; our information is decent, and within these boundaries you will find safe haven from political/media/private hysteria. This argument reinforces the existing community mythology that "we" are inherently good, a successful tactic for First Amendment activists noted by Medhurst (1982, p. 8). But it is sad to see that CN organizers implicitly attack all others outside of their community. Decency has become a dividing force as well as a silencing one. They assume that decency exists only in their little area, and does not exist outside. Decency ends up separating communities as each city constructs its neighbors as sites of pornography and obscenity.

Community networks rightly recognize that they cannot control the content of the Internet. However, some go even further and refuse to take responsibility for even local content. The end result is that CNs construct parents as the ones who must be responsible for the content their children see. The community is constructed as responsible only within very limited bounds. This sense of limited responsibility that the local community has toward its members is shrinking even more, since accepting responsibility is perceived as being fraught with legal peril. The move to diminish responsibility is not only found in issues of Internet decency. In America, we continually formulate issues in terms of rights, constructing absolutist subject positions where the individual is selfdetermining and free; but absent from this formulation is any developed discussion of responsibility. The "missing language of responsibility" is absent from divorce, for example, where "alone among nations, we have moved not merely to no-fault divorce, but towards no-responsibility divorce" (Glendon, 1991, p. 107). As our notions of community continue to be impoverished, the CDA fans the flames of the destruction of responsibility. More and more, the response to the CDA is to push responsibility onto someone else, or to even erase responsibility—a typical response from fear that easily leads to oppression.

In this atmosphere of fear, freedom is endangered. Even though freedom is in one sense restricted by communities, through the function of control, freedom "is also, in another sense, caused and promoted by human communities" (Simon, 1968, p. 68). Without a strong community, individual freedom cannot exist. Unfortunately, the CN movement is essentially apolitical, argues the author of a recent book on community networks: "it doesn't seem to be based on 'strong' principles and [it] generally eschews political and activist work" (D. Schuler, personal communication, Sept. 14, 1997). Most people involved with CNs are more concerned with access than activism, more concerned with strengthening local boundaries than with the larger society in which the community must exist and interact. Freedom thus is no longer a concern of the community, but of individuals. By ignoring the CDA, and leaving it up to individuals to fight for freedom, CNs are making a tactical error. Since they are often small operations, it is relatively simple for them to be seized and shut down by authorities. Without the support of large public user group, CNs who choose to ignore the CDA may find themselves silenced as well.

FREEDOM & RESPONSIBILITY IN THE DECENT COMMUNITY?

The CDA has provoked a variety of practical responses from community networks including disclaimers/user agreements, warnings, standards, education, and dismissals/ignorance. But woven throughout these varied responses is a consistent ideological theme that interlocks issues of community, freedom, responsibility, and decency. The tide of this essay asked, "Can we have freedom and responsibility in the 'decent' community?" Unfortunately, I believe, the answer is "no".

The CDA focuses attention on decency. It does so in a manner that creates an atmosphere of fear: fear of legal reprisals, fear of political entanglements. However, when the focus is so intently on decency, as in the case of the CDA, it encourages the construction of a community that is irresponsible and apolitical. The local community denies its responsibility to its members and removes itself from the fight for freedom of expression out of fear or, perhaps, indifference.

Of all the possible practical responses to the CDA, indifference is the most dangerous. Free societies must, as Drucker (1968) argued, allow people to opt out and live private, individual lives. But we must recognize that "this is not freedom. This is indifference" (p. 260). Communities cannot function without active members, and societies cannot function without active communities. Joint action is required to realize fundamental human purposes. If too many members of a community, or too many communities, fail to join in necessary collective efforts, those purposes will not be achieved and the community will collapse (Grisez & Shaw, 1974).

Plato asked, in his *Republic,* "I wonder if we could contrive . . . some magnificent myth that would in itself carry conviction to our whole community" (Bk. iii, 414). The CDA is not this magnificent myth—in fact, it does the exact opposite and diminishes conviction in the community. By making decency the center term around which the argument revolves, the CDA encourages the community to refuse responsibility and to ignore freedom. Even though the CDA was overturned by the Supreme Court, the Coats bill attempts to convict the community through fear of indecency. A more magnificent myth would return responsibility to the center of the issue, and convict individuals and communities of their need to take responsibility for their freedom of expression and for the welfare of their citizens.

REFERENCES

Agreement for account & rules of conduct [on-line]. (1998). Available: http://www.freenet.tlh.fl.us/doc/ conduct.doc.

City of Belmont disclaimer [on-line]. (1998). Available: http://www.belmont.gov/disclaim.html

Cybersight: LincolnNet's youth-operated electronic tabloid [on-line]. (1998). Available: http://www.lincolnnet.net/cybersight/

Drucker, P. (1968). *Age of discontinuity.* New York: Harper and Row.

Evoy, S. (1997). *CPSR/Seatlle opposes WA State Bill ESSB5466* [on-line]. Available: *http://enfo.com/Mail/Lists/cpsr/007.htm.*

Glendon, M. A. (1991). *Rights talk: The impoverishment of political discourse.* New York: Free Press.

GrandNet standards [on-line]. (1998). Available: http://www.grandnet.org/ about/standards.html

Grisez, G., & Shaw, R. (1974). *Beyond the new morality: The responsibilities of freedom.* Notre Dame: University of Notre Dame Press. MAIN disclaimer page [on-line]. (1998). Available: http://www.main.org/disclaim.html

McGee, M. (1980). The "ideograph": A link between rhetoric and ideology. *Quarterly foumal of Speech, 66,*116.

Medhurst, M. (1982). The First Amendment vs. human rights: A case study in community sentiment andargument from definition. *Western Journal of Speech Communication, 46,* 1-19.

Naples Free-Net home page [on-line]. (1998). Available: http://www.naples.net/

Naples Free-Net web page author's guide [on-line]. (1996). Available: http://www.naples.net/htmlgide.htm

Prohibition on commercial distribution on the World Wide Web of material that is harmful to minors [online]. (1997). Available: http://www.eff.org/pub/Censorship/ Internet_censorship_bills/sl482_1997.bill

Resch, J., & Huckaby, J. (Eds.) (1972). *Man and society: freedom and liberty.* Columbus, OH: Charles E. Merrill. *Seattle Community Network (SCN) user registration form* [on-line]. (1998) Available: http://www.scn.org/registration.html

Schuler, D. (1997). *CPSR: Against censorship* [on-line]. Available: http://www.cpsr.org/dox/links/schulerart.htm

Simon, Y. R. (1968). *Freedom and community.* New York: Fordham University Press. Text of statute with proposed amendment [on-line]. (1997). Available: http://www.eff.org/pub/Censorship/ Internet_censorship_bills/47usc_s223_exon_proposed.amend