Your response

Question	Your response
Question 1: Do you agree with our proposed guidance on scope? If not, please provide any information or evidence in support of your views, including descriptions of services or content where you consider it is unclear whether they fall within the scope of Part 5.	Confidential? – N I do not agree. The definition of pornography as material with the principal purpose of arousal is both incredibly narrow, incredibly broad, and outdated. Who's purpose? Who's arousal? This definition could apply to fully clothed 'non-sexual' material that is intended to arouse, regardless of whether anyone actually becomes aroused by it. Common advertisements, feature films, social media campaigns etc all use concept, as 'sex sells'. Levels of arousal 'caused' my materials cannot be determined by the 'purpose' of said materials. Many kinds of material arouse without that being their purpose. How are we defining 'arousal'? What about sex education materials? Does it depend on their explicitness? Much of pornography and sexual media now has the diverse and equal purposes of education, arousal, expression, normalisation, destigmatising, and more. What about sites that only provide previews and link to other sites for full content? It is extremely unclear what falls under different rules i.e. Video Sharing Platform vs On Demand Service etc. Providers are not lawyers and cannot be expected to read hundreds of pages and navigate complex interdependent legal documents to determine whether the previously legal work they have been doing is now illegal.
Question 2: Do you have any comments on how our proposed guidance applies in respect of pornographic content created by generative-AI services within the scope of Part 5? Please provide any information or evidence in support of your views.	Confidential? –N No, other than that AI should be regulated regardless of pornographic content, as it relates to issues of privacy, consent, image rights, theft etc.
Question 3: Do you have any comments on our proposed guidance in respect of the kinds of age assurance which could be highly effective? If you consider there are other kinds of	Confidential? –N Many age verification solutions exist on the market but not a single one is mentioned or recommended specifically in the guidance. How are providers supposed to se-

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age assurance which have not been listed that you consider could fulfil the proposed criteria, please identify these with any supporting information or evidence.	lect between these new, untested technologies considering the high risk of breaches in security and privacy that they all pose, not to mention the questions of accuracy, effectiveness, and reliability? Free Speech Coalition, Pandora Blake, Myles Jackman, and others have campaigned a lot on this issue. There are so many drawbacks to the burden of age verification being placed on providers and no benefits, considering that internet filters already provide an extremely easy, accessible, tried-and-tested solution for parents and adults to use toward the very same purpose. Building age verification solutions ourselves is out of the question for all but the largest, richest, corporations, such as Aylo (Pornhub etc) as it is extremely costly and complex. Many providers are small teams or even one person, serving and reflecting their communities with diverse and sex-positive material that does not make any profit due to the monopolies of big international providers. How are they to navigate this legislation, let alone provide informed choice and accessibility to their users as suggested?
Question 4: Do you agree that service providers should use the proposed criteria to determine whether the age assurance they implement which is highly effective at correctly determining whether or not a user is a child? Please provide any information or evidence in support of your views.	Confidential? – N I do not know if I understand the question, as it seems there is a typo / grammar error. But see my answer to the previous question.
Question 5: Do you have any information or evidence on the extent of circumvention risk affecting different age assurance methods and/or on any steps that providers might take to manage different circumvention risks for different methods?	Confidential? – N No, but this has been extensively documented by Free Speech Coalition, Pandora Blake, Myles Jackman, and others. VPNs and other technologies will always exist to get around age verification.

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Question 6: Do you agree with our proposed guidance that providers should consider accessibility and interoperability when implementing age assurance? Please provide any information or evidence in support of your views.	Confidential? – N See previous answers.
Question 7: Do you have comments on the illustrative case study we have set out in the guidance? Do you have any supporting information or evidence relating to additional examples of how the criteria and principles might apply to different age assurance processes?	Confidential? – N It is irrelevant in light of the considerations I mention in my previous answers. Language such as 'train the model on a diverse dataset' is completely irrelevant and laughable considering how most providers are not coders or technicians, let alone rich and profitable enough to be designing and building their own internet security technologies.
Question 8: Do you agree with our proposed guidance on the record-keeping duties? Please provide any information or evidence in support of your views.	Confidential? – N See previous answers.
Question 9: Do you have any comments on our proposed approach to assessing compliance with the duties on service providers who publish or display pornographic content, including on the proposed examples of non-compliance? Please provide any information or evidence in support of your views.	Confidential? – N See previous answers.
Question 10: Do you have any comments on the impact assessment set out in Annex 1? Please provide any information or evidence in support of your views	Confidential? – N I cannot find Annex 1. But in terms of impact, this legislation only serves to make the internet less safe, by requiring sensitive personal data to be collected and processed and risk security breaches that can ruin lives (see Ashley Maddison scandal). It also risk normalising the LACK of sex education and porn/internet literacy, with parents,

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	carers, and school simply relying on easily subverted prohibitions driving stigma and shame rather then safely educating.
Question 11: Do you agree that our proposed guidance is likely to have positive effects on opportunities to use Welsh and treating Welsh no less favourably than English? If you disagree, please explain why, including how you consider the proposed guidance could be revised to have positive effects or more positive effects, or no adverse effects or fewer adverse effects on opportunities to use Welsh and treating Welsh no less favourably than English.	Confidential? – N No, I don't understand how it could, or why this question is even present in this context.

Please complete this form in full and return to Part5Guidance@ofcom.org.uk.