

November 16, 2023

Submission to the National Telecommunications and Information Administration on Kids Online Health and Safety

To the National Telecommunications and Information Administration,

We hereby submit these comments to better inform and educate the Task Force on Kids Online Health & Safety on the pressing issues of keeping kids safe online while remaining steadfast to the open, innovative nature of digital technologies such as the Internet.

1. The Role of Technological Solutions

As a consumer advocacy group that champions tech innovation and consumer choice, we believe wholeheartedly that, where necessary, technological solutions should be a principal alternative to restrictive regulation that will impose direct and indirect costs and create barriers to online information and connection.

With many social situations or platforms, we know that there exists much concern about young people, teens especially, and their behavior online. There has been a constant barrage of academic research, political proposals, and messaging campaigns that center on restricting parts of online life to young people for their safety.

While there is a definitive trend as to the framing of social media use as negative for young people, the existing research is much more nuanced and likely more balanced when we consider the benefits.

A 2022 [study](#) in Current Psychology found that in classifying users into 3 categories: active, passive, and average use of social media, each documented benefits that outweigh potential harms, even more so for the larger category of “average” users.

For every media outrage story about questionable online content or behavior, there are dozens more unreported of improved social well-being, more social connection, and genuine happiness, especially among young people. This is especially true because, for the most part, teens and young people have gravitated from purely physical social lives to a hybrid social life online as well, unlocking new opportunities to explore, learn, and expand their knowledge and understanding.

This was also [admitted](#) by the American Psychological Association, which this year published its own recommendations for parents of teens to monitor online safety.



The solutions offered by the APA and several partner organizations are important, and likely do have merit and efficacy with young people online. Contrasting with many proposals existing in legislation, these recommendations are to be overseen and executed by parents and communities, and would negate the need for punitive measures issued by governments.

We believe this is an important factor for any remedy affecting online safety for teens and young adults. Voluntary measures, whether that be parental screening, communication, or oversight, when used in conjunction with technological tools, will have a more balanced and effective result than any government-imposed restriction.

Parental screening of application downloads, online profiles, and general education about behavior and content online has thus far proven to be the most measured approach to kid safety online, and it should continue to be.

2. The Wrong Path of State Intervention

Proposals that lead to agency or government intervention into these efforts, we believe, would do more harm than good.

As we have seen in several state proposals in Texas, Louisiana, and Arkansas, preemptively limiting youth access to online social media use not only elicits legal questions, but also severely restricts the ability for young people to explore the benefits of online platforms and networks.

These proposals have been akin to a labyrinth of weaponized policies that prevent teens from engaging with friends and family online, would burden future social media upstarts, and would lead to worse precedents that put free speech on the Internet at risk, as well as leading to significant hacker exploits.

Proposals such as the now enjoined SB396 in Arkansas make it more difficult for young people to begin to use the Internet and all the benefits it provides, but it also enshrined into law the idea that governments should pick which social media networks young people can or cannot use rather than parents.

We believe this is paternalistic, sets a terrible precedent for online speech and access, and amounts to nothing more than heavy-handed government control of who is allowed online and when.

It elicits the question of whether the final arbiter of whether young people access the Internet at all, and that parents should have diminished say in their kids' digital lives. We believe that is fundamentally wrong.

Unfortunately, we see in these legislative attempts few good-willed efforts at remedying online safety concerns, and instead legislative retribution against certain social media companies based on political persuasion.





What's more, many of these proposed solutions would likely create more substantive harm from digital exploitation of information and data than current voluntary or technological tools available to parents.

These proposals, including federal proposals from the US Senate such as the Kids Online Safety Act, require social media websites to collect sensitive photos, IDs, and documentation of minors, mandating enormous privacy risks that will be a cyberhacker's dream.

We believe that as a society, we should trust that parents have the ultimate right to decide whether or not their children access certain websites or services, and that those decisions are not overruled by legislative proposals.

3. The answer is technology

As we have stated, and as the research demonstrates, there are immense benefits to social media that are practiced and explored each and every day for people of any age category.

Whether it be for creative purposes, democratic expression, social connection, commerce and business, or education, there are a myriad of benefits to social media that, when paired with responsible adult supervision and guidance, will continue to be a positive force for society as a whole.

Where necessary, when parents and communities can implement technological solutions that help improve the benefits of social media use – whether it be in voluntary parental filters, download authorization, or educational materials – this will be the best and most effective method for protecting young people online. Keeping the Internet as an open ecosystem for exploration, learning, and connection will bring many more benefits to the next generation than restrictive bans or limits imposed by law.

We hope your commission will take these points to heart, and will continue to advocate for responsible use of technology and the Internet for young people and their parents.

Sincerely yours,

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