



May 18, 2021

The Honorable Richard Blumenthal
Chairman
Senate Subcommittee on Consumer Protection, Product Safety, and Data Security
United States Senate
706 Hart Senate Office Building
Washington, D.C. 20510

The Honorable Marsha Blackburn
Ranking Member
Senate Subcommittee on Consumer Protection, Product Safety, and Data Security
United States Senate
357 Dirksen Senate Office Building
Washington, D.C. 20510

Dear Chairman Blumenthal and Ranking Member Blackburn,

Internet Association (IA) welcomes the opportunity to submit this letter for the record as a part of the Senate Commerce Subcommittee on Consumer Protection, Product Safety, and Data Security's May 18, 2021 hearing, "*Protecting Kids Online: Internet Privacy and Manipulative Marketing.*"

IA¹ is the only trade association that exclusively represents global internet companies on matters of public policy. Our mission is to foster innovation, promote economic growth, and empower people through the free and open internet. We believe the internet creates unprecedented benefits for society and the economy and, as the voice of the world's leading internet companies, IA works to ensure legislators, consumers, and other stakeholders understand these benefits.

¹ IA represents the interests of companies including: Airbnb; Amazon; Ancestry; Discord; DoorDash; Dropbox; eBay; Etsy; Eventbrite; Expedia Group; Facebook; Google; GrubHub; Handy; IAC; Indeed; Intuit; LinkedIn; Match Group; Microsoft; Notarize; PayPal; Pinterest; Postmates; Quicken Loans; Rackspace; Rakuten; Reddit; Snap Inc.; Spotify; Stripe; SurveyMonkey; Thumbtack; TripAdvisor; Turo; Twitter; Uber Technologies, Inc.; Upwork; Vrbo; Zillow Group; and, ZipRecruiter. IA's current member list is available at: <https://internetassociation.org/our-members/>.



We appreciate the Subcommittee holding this important hearing and acknowledge the timeliness of this topic. IA members know that protecting children online and ensuring their safety is an extremely important task that should not be taken lightly. Our members are consistently improving child and teen services on their platform and working with experts in the field to create resources for parents to monitor their children's online activity and identify ways to make children safer online. We recognize the importance of this issue and know that our industry has an integral role in creating a safe online environment for children and families. IA members are committed to working with Congress towards this goal.

During the past year, concerns surrounding child online safety issues were amplified due to the COVID-19 global health pandemic and the internet being the primary resource for schoolwork, entertainment, and connecting with friends and extended family. IA member companies responded to these needs by providing access to the necessary tools to participate in remote learning and launching initiatives for educators, students, and parents to aid with online education.²

IA and its members have also been longtime supporters of the Children and Media Research Advancement Act (CAMRA Act), which supports commissioning research on children's technology use and particular health outcomes including addiction, bullying, and depression. IA members work every day to ensure the well-being of their child and teen users on their services and we take parents' and members of this Subcommittee's concerns about child online habits seriously. IA member companies are routinely finding new ways to create family resources on digital wellness, screen time, and more.³ We share the following information with you to demonstrate our member companies' commitment to the issues of children and teens online safety, privacy, and overall positive interactions with the internet ecosystem. It is our hope that this information provides useful context to the Subcommittee as you examine areas that need attention.

² IA Members Are Supporting Online Learning, Internet Association, <https://covid19.internetassociation.org/industry/response/education/>.

³ <https://www.childrenshospital.org/newsroom/news-and-events/2021/digital-wellness-lab-launch>; <https://wellbeing.google/for-families/>.



Child-directed Services

Child-directed services are intended to provide a balanced approach that gives children access to age-appropriate services, information, and experiences, while also keeping them safe with parental controls that can be individualized on a family-by-family basis.

Many IA member companies operate “general audience” services that do not permit users under the age of 13.⁴ Those IA members who offer stand-alone services specifically tailored for use by children also offer tools that facilitate adult supervision of their children's online experiences. Some IA companies also provide non-monetized products and services that help educational institutions integrate technology into the classroom and augment the traditional classroom experience. There are IA companies that create relationships with students in purely an educational capacity in order to provide continuous learning through courses, progress records, and certifications.

IA members that have services directed at children take many of the following steps to ensure kids and their personal information are protected online:

- Creating partnerships with organizations and experts in the field of online child safety, including: the National PTA, Blue Star Families, the Family Online Safety Institute, Internet Keep Safe Coalition, Connect Safely, Center on Media and Child Health, MediaSmarts, the Yale Center for Emotional Intelligence.
- Investing in awareness campaigns to ensure that parents know how to access and use the tools that are available on their services to monitor and support their child's activities online.
 - These tools include: pre-selecting the content a child can access, selecting content “levels” based on a child's age, requiring an adult's approval before a child can communicate with someone else using the service, setting automatic limits on screen time, blocking features, providing adults with a history on their children's activity on the service, and providing resources that parents can use to talking to kids about their online activities and online safety.
- Limiting the amount of personal information that the services collect from children.
- Providing parents with the ability to access, remove, or delete a minor's personal information.

⁴ Companies may set other age requirements, such as 13 or 18. The Children's Online Privacy Protection Act regulates sites that are directed to children under 13.



- Restricting the number of advertisements children view on their service; limiting the content within those advertisements to age-appropriate materials ; preventing the use of children’s data for targeted or behavioral advertising; placing restrictions on the ways in which advertisements are presented; conducting a rigorous review for what is considered a family-friendly advertisement; and following all relevant state and federal laws that pertain to advertising content.

Safety for Teens

Every year IA member companies are crafting new and innovative ways to make teenagers’ online experiences safer and more positive. In 2018, the Pew Research Center conducted a study about the social media habits of teens and their impact on building stronger friendships and exposures to a more diverse world.⁵ The study found that seventy-one percent of teens felt more confident and included as a result of their online interactions. The internet also creates safe spaces for teens to find the social support that they need when it is absent in their immediate community. For example, a young teen or child that is experiencing the loss of a parent is able to find peers going through the same struggles, develop a support system, and locate relevant resources that they otherwise may not have access to.

IA member companies have a history of supporting online safety efforts that are directed to or benefit teen users. Teens and their adult caretakers have access to a wide range of tools and educational content that promote safe use of online services. These tools may include:

- Content filtering that screens out content that may be rated for mature audiences or is otherwise not considered appropriate for audiences of younger users.
- Providing highly-protective default settings for facial recognition, location-sharing, messaging capabilities between teens and adults, and audience settings. There are also advertising prohibitions as a part of IA member services for users under the age of 18 for content pertaining to things like weight loss supplements, alcohol, gambling, and dating.
- Providing user-friendly and accessible safety tools and education or prompts on how to use them. These tools include controls for the visibility of their accounts, who is able to contact them, and tools for muting and blocking individual users or content.
- Limiting the types of data that the companies process for users under the age of 18 and limiting the retention of teen users’ information.

⁵ <https://www.pewresearch.org/internet/2018/11/28/teens-social-media-habits-and-experiences/>.



- Educating users on critical topics relevant to teens, such as bullying, media literacy, and digital citizenship.
- Creating “bully filters” that use artificial intelligence to review how words are used online, in addition to identifying and removing categories like bullying, racism, and sexual harassment.

IA Member Company Commitment to Countering Child Sexual Exploitation

IA member companies, alongside governments, civil society, and other stakeholders, continually address the most serious threats to child safety including child sexual exploitation. IA and its member companies share the goal of eradicating child exploitation online and offline, and our member companies strive to combat child exploitation online. They take a variety of actions, including dedicating engineering resources to the development of tools like Microsoft’s PhotoDNA,⁶ Google’s CSAI Match,⁷ and Facebook’s open sourced PDQ and TMK + PDQF,⁸ assisting in the modernization of the Cybertipline by donating engineering resources or funds, and engaging with law enforcement agencies. Many companies also proactively detect and report instances of child sexual abuse material (CSAM) to National Center for Missing and Exploited Children (NCMEC). Our members have been a part of collaborative efforts such as the Technology Coalition⁹ and WePROTECT Global Alliance¹⁰ to continue working towards fighting child exploitation online and developing a cross-industry approach to prevention and detection of these materials. IA supported the CyberTipline Modernization Act of 2018 to strengthen engagement between NCMEC, the public, and the internet sector and to improve law enforcement’s capabilities in the fight to combat child exploitation online and offline. In 2020, the Technology Coalition launched Project Protect¹¹ to further combat online child sexual abuse with five key concepts: (1) technology innovation; (2) independent research; (3) collective action; (4) information and sharing; and (5) transparency and accountability. These are just a few examples of the steps that IA companies take to make the online and offline world a safer place.

⁶ <https://www.microsoft.com/en-us/photodna>.

⁷ <https://www.youtube.com/csai-match/>.

⁸ <https://about.fb.com/news/2019/08/open-source-photo-video-matching/>;
<https://www.facebook.com/safety/onlinechildprotection>.

⁹ <https://www.technologycoalition.org/>.

¹⁰ <https://www.weprotect.org/>.

¹¹ <https://www.end-violence.org/articles/project-protect-new-initiative-end-violence-online>.



IA members frequently partner with groups dedicated to ending abuse of vulnerable populations and supporting survivors such as Polaris¹² and Thorn.¹³ Some IA member companies, where appropriate, maintain safety resources to educate parents and teen users about online risks and the product features and tools available within the services to address those risks. In addition, they point users who are particularly at risk to support organizations that can render real world aid wherever they are located. Many of these resources and programs have been developed in consultation with subject matter experts, including through company-created advisory groups that facilitate broad input or through specific partnerships that target particular challenges.

Child Online Privacy as a Part of a Federal Comprehensive Privacy Law

IA members share this Subcommittee's interest in protecting children's privacy and ensuring their safety online. It is our goal to work with Congress on this important issue and we would recommend the Committee consider incorporating online child privacy provisions into the text of a comprehensive federal privacy bill that protects the privacy of all Americans. It is important that people of all ages have meaningful control over the personal information they share with companies. IA members are supportive of a federal privacy framework that provides individuals with important consumer rights including reasonable access, correction, and deletion of their data across all industries, holds companies accountable, and includes purposeful Federal Trade Commission enforcement.

IA and our member companies look forward to working with stakeholders and members of Congress to identify areas of concern and to develop strategies to more effectively protect children online. We share the Subcommittee's goal of strengthening consumer privacy and protecting children from harmful online behavior.

Sincerely,

A handwritten signature in black ink that reads 'K. Dane Snowden'.

K. Dane Snowden

¹² <https://polarisproject.org/>.

¹³ <https://www.thorn.org/>.