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**Children’s Advocates Urge the Federal Trade Commission to  
Enact 21<sup>st</sup> Century Privacy Protections for Children**

*More than ten years since last review, organizations urge the FTC to update  
the Children’s Online Privacy Protection Act (COPPA)*

**WASHINGTON, DC — Tuesday, March 12, 2024** – A coalition of eleven leading health, privacy, consumer protection, and child rights groups has filed [comments](#) at the Federal Trade Commission (FTC) offering a digital roadmap for stronger safeguards while also supporting many of the agency’s key proposals for updating its regulations implementing the bipartisan Children’s Online Privacy Protection Act (COPPA). Comments submitted by Fairplay, the Center for Digital Democracy, the American Academy of Pediatrics, and other advocacy groups supported many of the changes the commission proposed in its Notice of Proposed Rulemaking issued in December 2023. The groups, however, told the FTC that a range of additional protections are required to address the “Big Data” and Artificial Intelligence (AI) driven commercial surveillance marketplace operating today, where children and their data are a highly prized and sought after target across online platforms and applications.

“The ever-expanding system of commercial surveillance marketing online that continually tracks and targets children must be reined in now,” said Katharina Kopp, Deputy Director, Director of Policy, Center for Digital Democracy. “The FTC and children’s advocates have offered a digital roadmap to ensure that data gathered by children have the much-needed safeguards. With kids being a key and highly lucrative target desired by platforms, advertisers, and marketers, and with growing invasive tactics such as AI used to manipulate them, we call on the FTC to enact 21<sup>st</sup>-century rules that place the privacy and well-being of children first.”

“In a world where streaming and gaming, AI-powered chatbots, and ed tech in classrooms are exploding, children’s online privacy is as important as ever,” said Haley Hinkle, Policy Counsel, Fairplay. “Fairplay and its partners support the FTC’s efforts to ensure the COPPA Rule meets kids’ and families’ needs, and we lay out the ways in which the Rule addresses current industry practices. COPPA is a critical tool for keeping Big Tech in check, and we urge the Commission to adopt the strongest possible Rule in order to protect children into the next decade of technological advancement.”

While generally supporting the commission's proposal that provides parents or caregivers greater control over a child's data collection via their consent, the groups told the commission that a number of improvements and clarifications are required to ensure that privacy protections for a child's data are effectively implemented. They include issues such as:

- The emerging risks posed to children by AI-powered chatbots and biometric data collection.
- The need to apply COPPA's data minimization requirements to data collection, use, and retention to reduce the amount of children's data in the audience economy and to limit targeted marketing.
- The applicability of the Rule's provisions – including notice and the separate parental consent for collection and disclosure consent and data minimization requirements – to the vast networks of third parties that claim to share children's data in privacy safe ways, including "clean rooms", but still utilize young users' personal information for marketing.
- The threats posed to children by ed tech platforms and the necessity of strict limitations on any use authorized by schools.
- The need for clear notice, security program, and privacy program requirements in order to effectively realize COPPA's limitations on the collection, use, and sharing of personal information.

The 11 organizations that signed on to the comments are: the Center for Digital Democracy (CDD); Fairplay; American Academy of Pediatrics; Berkeley Media Studies Group; Children and Screens: Institute of Digital Media and Child Development; Consumer Federation of America; Center for Humane Technology; Eating Disorders Coalition for Research, Policy, & Action; Issue One; Parents Television and Media Council; and U.S. PIRG.

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