

Statements by CDD, CCFC, AAP, and IPR on comments filed in response to the Federal Trade Commission's review of COPPA

Washington, December 11, 2019

In [comments filed today](#) in response to the Federal Trade Commission's review of COPPA, the Center for Digital Democracy, the Campaign for a Commercial-Free Childhood, the American Academy of Pediatrics, and a total of 19 advocacy groups faulted the FTC for failing to engage in sufficient enforcement and oversight of the children's privacy law. The groups suggested how COPPA can better protect children's privacy, and urged the Commission not to weaken the law to satisfy industry's thirst for more data about kids. The advocates also urged the FTC first to investigate the children's "kid tech" market before it proposes any changes in how to implement its rules.

The following can be attributed to Jeff Chester, Executive Director, Center for Digital Democracy:

"Children are at greater risk today of losing their digital privacy because the FTC has failed to enforce COPPA. For years, the Commission has allowed Google and many others to ignore the landmark bipartisan law designed to protect children under 13. It's time for the FTC to stand up to the big data companies and put the interests of young people and families first."

The following can be attributed to Josh Golin, Executive Director, Campaign for a Commercial-Free Childhood:

"This is a critical moment for the future of children's online privacy. The ink is barely dry on the FTC's first major COPPA enforcement, and already industry is mobilizing to weaken the rules. The FTC should not make any changes to COPPA until it uses its authority to learn exactly how Big Tech is collecting and monetizing our children's data."

The following can be attributed to Kyle Yasuda, MD, FAAP, President, American Academy of Pediatrics:

"Keeping children safe and healthy where they learn and grow is core to what pediatricians do every day, and today more than ever before that extends to the digital spaces that children inhabit. The Children's Online Privacy Protection Act is a foundational law that helps hold companies accountable to basic standards of safety when it comes to children's digital privacy, but it's only as effective as its enforcement by the Federal Trade Commission. Before any major changes are made to COPPA, we must ensure that the FTC is doing its part to keep children safe wherever they engage online."

The following can be attributed to Laura Moy, Associate Professor of Law, Director of the Communications and Technology Law Clinic, Institute for Public Representation at Georgetown University Law Center:

"A recent survey showed that the majority of Americans feel that 'the threat to personal privacy online is a crisis.' We are at a critical point in our nation's history right now—when we are deciding whether or not to allow companies to track, profile, and target us to an extent that compromises our ability to be and make decisions for ourselves. At the forefront of that discussion are children. We must protect the next generation from inappropriate tracking so that they can grow up with privacy and dignity. To make good on that, the FTC must thoroughly investigate how companies are collecting and using children's data, and must enforce and strengthen COPPA."

The comments filed with the FTC were prepared by the Institute for Public Representation at Georgetown University Law Center on behalf of Center for Digital Democracy and Campaign for a Commercial-Free Childhood.