



Responses to Questions for the Record
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Regarding “Kids Online During COVID: Child Safety in an Increasingly Digital Age”
March 11, 2021 Hearing Before the
United States House of Representatives, Committee on Energy and Commerce,
Subcommittee on Consumer Protection and Commerce

April 12, 2021

The Honorable Lori Trahan (D-MA)

1. Facebook launched Messenger Kids in 2017, a video messaging and chat app for kids that offers parental controls. After the launch, advocacy groups including Common Sense Media asked Facebook to discontinue the product. Can you explain your concerns with this application?

Messenger Kids has gotten more young children onto Facebook's services--and we have not seen evidence that it has moved anyone who lied to get on Facebook off of it. We are concerned about normalizing social media use for younger children, because of the mental health and privacy harms that have surfaced in older more studied populations.

Social media has different mental effects on different teens--but recent research shows that teens who are depressed tend to use social media more, and that social media can have an outsize influence on them (both negatively and positively).¹ Social media can lead to anxiety and stress among teen girls who compare themselves to others.² And teens who are active online can worry a lot about how they are perceived.³ We do not want children, especially young girls, to begin internalizing these worries even earlier. In addition, the younger kids are when they start sharing data with Facebook, the more data that company will have about them in perpetuity. And Facebook does not have the best track record of protecting user data. Facebook has refused to state in its privacy policy for Messenger Kids that it will never use children's information for targeted advertising. Messenger Kids for a time unwittingly allowed children to chat with unknown adults, exposing kids to strangers.⁴ And while initially Facebook strictly limited how parents could find other children for their own children to connect with, the company appears to be continually loosening these limits, and now allows for a setting whereby Facebook will suggest kids to other kids (via name and profile photo). This is a very slippery slope.

¹ Rideout, V., Fox, S., Peebles, A., & Robb, M. B. (2021). Coping with COVID-19: How young people use digital media to manage their mental health. San Francisco, CA: Common Sense and Hopelab.

² Kleemans M, Daalmans S, Carbaat I, Anschütz D. Picture perfect: the direct effect of manipulated Instagram photos on body image in adolescent girls. *Media Psychology*. 2018;21(1):93–110.

³ Common Sense Media, *Children, Teens, Media, and Body Image*, (January 20, 2015).

⁴ Russell Brandom, "[Facebook Design Flaw Let Thousands of Kids Join Chats with Unauthorized Users](#)," *The Verge* (July 22, 2019).

2. During the first few months of the COVID-19 pandemic, the number of daily active accounts on Messenger Kids grew over 3-fold. Have organizations like Common Sense Media learned more about how Messenger Kids has impacted children’s relationship with social media?

Common Sense does not have research specific to Messenger Kids at this time. And frankly, the amount of research academics and nonprofits are able to do pales in comparison to that done internally by social media companies themselves. We believe that more research about tech and kids is critical and that Congress is in a position to support independent research into the longitudinal effects of technology and media on all types of children and teens. The Children and Media Research Advancement Act (CAMRA)⁵ provides an excellent vehicle for doing so, and we thank you for your leadership on this issue.

3. When children turn 13, they can create their own social-media account without their parent’s permission. Can you describe the mental health risks associated with joining a social media platform too young?

Early adolescence (age 10 to 14) is an especially sensitive time for children. It is when mental health symptoms often first emerge *and* many adolescents begin to use social media frequently. We are concerned about children’s exposure during these important years to inappropriate content, cyberbullying, inappropriate sharing of personal info, commercialism and exposure to ads, and the uncertainty of what companies may do then or in the future with their data.

Offline risks and changes in behaviors often coincide or overlap with online risks, as young adolescents with existing mental health vulnerabilities report more negative online experiences and patterns of social media use that may be potentially more harmful.⁶ Adolescents who are especially sensitive to social evaluation, who may have “low” status offline, and/ or a history of victimization or bullying may have unique vulnerabilities as they transition into online spaces-- and this is something to consider when determining whether children are “too young” for social media.⁷ (Our research has also shown that for some teens and young adults social media can be a place they turn to for support.⁸) Research demonstrates some of the particular susceptibility of those on the younger spectrum: For example, tween girls in particular are vulnerable to the social

⁵ H.R.2161, To amend the Public Health Service Act to authorize a program on children and the media within the National Institute of Health to study the health and developmental effects of technology on infants, children, and adolescents. (Representative Raskin, 117th Congress)

⁶ Rideout, V., Fox, S., Peebles, A., & Robb, M. B. (2021). *Coping with COVID-19: How young people use digital media to manage their mental health.* San Francisco, CA: Common Sense and Hopelab.

⁷ Rideout, V., Fox, S., Peebles, A., & Robb, M. B. (2021). *Coping with COVID-19: How young people use digital media to manage their mental health.* San Francisco, CA: Common Sense and Hopelab.

⁸ Rideout, V., Fox, S., Peebles, A., & Robb, M. B. (2021). *Coping with COVID-19: How young people use digital media to manage their mental health.* San Francisco, CA: Common Sense and Hopelab.

comparison that happens on social media and prolonged use may contribute to anxiety.⁹ Also, a recent study of tweens found that exposure to “kidfluencers” is associated with a desire to emulate such individuals.¹⁰

4. BuzzFeed recently leaked an internal Facebook post which states it is “building a version of Instagram that allows people under the age of 13 to safely use Instagram for the first time.” While the product details have not been released, what design features and data protections should Members of Congress inquire about?

We are deeply concerned about attempts to reach even younger children with Instagram, and appreciate the inquiry you sent to Mark Zuckerberg on this issue on April 5, 2021.¹¹ Design features and data protections Members of Congress should inquire about include:

Privacy

- What defaults are in place when it comes to privacy with respect to other users and the public--what is shared publicly (e.g. posts, locations, followers), who can contact whom, and how?
- What information does Facebook require, what does Facebook do with this information (e.g. is it added to existing profiles, used for commercial profiling and ad targeting), how long will Facebook keep this information and how can users delete and correct it?
- How will Facebook connect the information on Instagram Kids with its other information collected from its products or across the internet?
- How does Facebook explain its privacy and data practices to parents and to children?

Manipulative Design

- What design features are in place to help children limit time spent on the app?
- What design features encourage consumption and infinite scrolling?
- Are there design features that encourage children to give up more information than is necessary?

Digital Well-Being

- What kinds of popularity metrics are there (e.g. likes, number of followers)?
- What types of image alteration are available within the app, and how is this disclosed to impressionable children?
- What types of monitoring and moderation occur?
- How do users report abuse or misuse?

⁹ Jean M. Twenge, Gabrielle N. Martin, Gender differences in associations between digital media use and psychological well-being: Evidence from three large datasets, *Journal of Adolescence*, Volume 79, 2020, Pages 91-102, ISSN 0140-1971, <https://doi.org/10.1016/j.adolescence.2019.12.018>.

¹⁰ Eric E Rasmussen, Rachel E. Riggs & Willow S. Sauerlich (2021) Kidfluencer exposure, materialism, and U.S. tweens’ purchase of sponsored products, *Journal of Children and Media*, DOI: 10.1080/17482798.2021.1910053

¹¹ Press Release. [Senator Markey, Rep. Castor, Senator Blumenthal, and Rep. Trahan Press Facebook on Plans to Develop Instagram for Children](#), (April 5, 2021)

- What can parents see and how is this messaged to children?

Commercialization

- Is advertising allowed and how is it identified from native content?
- Are influencers allowed on the app, and how are those disclosed to users?
- Are in-app purchases allowed?

The Honorable Lisa Blunt Rochester (D-DE)

1. We often see tech designs subverting parental choice. But you mentioned a troubling, though natural, parent-child relationship – as children grow older, their parents naturally supervise their behavior less.

a. Regulating manipulative practices that affect teens is crucial – are there any teen patterns of use or design choices that are unique to this age group that we should be aware of?

We know that teens tend to prioritize immediate rewards over long-term risks¹², have difficulties self-regulating¹³, and that they are particularly attuned to the opinions of others as they are developing their own sense of self.¹⁴ This indicates teens may be especially susceptible to design features or nudges that advise them to “act now” or indicate they will miss out on opportunities if they do not act immediately. Teens may also have more trouble resisting design features that encourage compulsive use, like points for daily communications with friends, auto-play, and other nudges to sign in again to devices. Further, teens are likely to be acutely aware of measures of popularity, including design features that attempt to quantify popularity (e.g., “likes” or numbers of followers) or indications that online friends are hanging out without them or ignoring them (seeing a friend read your message or logged on but did not respond).

Congress is in a position where it can act to curb many of these harmful practices, as technology companies appear unwilling to act on their own. We are grateful for your leadership in addressing manipulative design that subverts user choice and compels compulsive usage, and applaud efforts like the DETOUR Act¹⁵ and the KIDS Act¹⁶ which would curb companies’ abilities to use harmful manipulative design on teenagers.

¹² Adriana Galvan et al., *Earlier Development of the Accumbens Relative to Orbitofrontal Cortex Might Underlie Risk-Taking Behavior in Adolescents* 26 *Journal of Neuroscience* 25 (2006)

¹³ Casey, B., & Caudle, K. (2013). The Teenage Brain: Self Control. *Current directions in psychological science*, 22(2), 82–87. <https://doi.org/10.1177/0963721413480170>

¹⁴ Zuboff, Shoshana, *The Age of Surveillance Capitalism: The Fight for a Human Future at the New Frontier of Power*, p. 449, (January 15, 2019).

¹⁵ H.R. 8975, Deceptive Experiences To Online Users Reduction Act or the DETOUR Act (Representative Lisa Blunt Rochester, 116th Congress)

¹⁶ H.R. 8372, Kids Internet Design and Safety Act or the KIDS Act, (Representative Kathy Castor, 116th Congress)