

January 16, 2025

Center for Digital Democracy

Washington, DC

Contact: Katharina Kopp, kkopp@democraticmedia.org

Statement on the Federal Trade Commission's Amendments to the Children's Online Privacy Protection Rule

The following statement is attributed to **Katharina Kopp, Ph.D., Deputy Director of the Center for Digital Democracy:**

As digital media becomes increasingly embedded in children's lives, it more aggressively surveils, manipulates, discriminates, exploits, and harms them. Families and caregivers know all too well the impossible task of keeping children safe online. Strong privacy protections are critical to ensuring their well-being and safety. The Federal Trade Commission's (FTC) finalized amendments to the Children's Online Privacy Protection Rule (COPPA Rule) are a crucial step forward, enhancing safeguards and shifting the responsibility for privacy protections from parents to service providers. Key updates include:

- **Restrictions on hyper-personalized data collection for targeted advertising:**
 - o Mandating separate parental consent for disclosing personal information to third parties.
 - o Prohibiting the conditioning of service access on such consent.
- **Limits on data retention:**
 - o Imposing stricter data retention limits.
- **Baseline and default privacy protections:**
 - o Strengthening purpose specification and disclosure requirements.
- **Enhanced data security requirements:**
 - o Requiring robust information security programs.

We commend the FTC, under Chair Lina Khan's leadership, for finalizing this much-needed update to the COPPA Rule. The last revision, in 2013, was over a decade ago. Since then, the digital landscape has been radically transformed by practices such as mass data collection, AI-driven systems, cloud-based interconnected platforms, sentiment and facial analytics, cross-platform tracking, and manipulative, addictive design practices. These largely unregulated, Big Tech and investor driven transformations have created a hyper-surveillance environment that is especially harmful and toxic to children and teens.

The data-driven, targeted advertising business model continues to pose daily threats to the health, safety, and privacy of children and their families. The FTC's updated rule is a small but significant step toward addressing these risks, curbing harmful practices by Big Tech, and strengthening privacy protections for America's youth online.

To ensure comprehensive safeguards for children and teens in the digital world, it is essential that the incoming FTC leadership enforces the updated COPPA Rule vigorously and without delay. Additionally, it is imperative that Congress enacts further privacy protections and establishes prohibitions against harmful applications of AI technologies.

*

*

*

In 2024, a coalition of eleven leading health, privacy, consumer protection, and child rights groups [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 were submitted by Fairplay, the Center for Digital Democracy, the American Academy of Pediatrics, and other advocacy groups.

The Center for Digital Democracy is a public interest research and advocacy organization, established in 2001, which works on behalf of citizens, consumers, communities, and youth to protect and expand privacy, digital rights, and data justice. CDD's predecessor, the Center for Media Education, led the campaign for the passage of COPPA over 25 years ago in 1998.