



February 28, 2023

Joint Committee on General Law
Attn: Michael Shannon, Committee Clerk
Legislative Office Building, Room 3500
300 Capitol Avenue
Hartford, CT 06106

Re: S.B. 395 - An Act Concerning Social Media and Parental Consent (Oppose)

Dear Co-Chair Maroney, Co-Chair D'Agostino, and Members of the Joint Committee on General Law:

On behalf of the Computer & Communications Industry Association (CCIA), I write to respectfully oppose S.B. 395, An Act Concerning Social Media and Parental Consent.

CCIA is an international, not-for-profit trade association representing a broad cross-section of communications and technology firms¹. For over 50 years, CCIA has promoted open markets, open systems, and open networks.

CCIA strongly believes younger users deserve an enhanced level of security and privacy online. Currently, there are a number of efforts among our members to incorporate protective design features into their websites and platforms. CCIA's members have been leading the effort in raising the standard for teen safety and privacy across our industry by creating new features, settings, parental tools, and protections that are age-appropriate and tailored to the differing developmental needs of young people. Ahead of the introduction of full legislative language concerning social media and parental consent, we offer the following comments to help guide the legislature's consideration of this policy area.

1. Restricting access to the internet for children also restricts their access to supportive communities that may not be accessible forums in their physical location.

When businesses are required to deny access to social networking sites or other online resources, this may also unintentionally restrict children's ability to access and connect with like-minded individuals and communities. For example, children of racial or other minority groups may not live in an area where they can easily connect with others that represent and relate to their own unique experiences.

¹ For 50 years, CCIA has promoted open markets, open systems, and open networks. CCIA members employ more than 1.6 million workers, invest more than \$100 billion in research and development, and contribute trillions of dollars in productivity to the global economy. A list of CCIA members is available at <https://www.ccianet.org/members>.



An online central meeting place where kids can share their experiences and find support can have positive impacts.

The hyperconnected nature of social media has led many to allege that online services may be negatively impacting teenagers' mental health. However, some researchers argue that this theory is not well supported by existing evidence and repeats a "moral panic" argument frequently associated with new technologies and new modes of communication. Instead, social media effects are nuanced,² small at best, reciprocal over time, and gender-specific. Teens themselves also paint a nuanced picture of the effects of social media. It is one in which majorities credit these platforms³ with deepening connections and providing a support network when they need it. In a recent survey, 80% of teens say that what they see on social media makes them feel more connected to what's going on in their friends' lives, while 71% say it makes them feel like they have a place where they can show their creative side. Additionally, 67% also say these platforms make them feel as if they have people who can support them through tough times.

2. Any legislation should be sure to avoid unintended pitfalls which could put more children at risk.

As other states have considered well-intended legislation to shape childrens' online experience, many proposals that have been considered would implement requirements that would actually require the harvesting of additional data on children and would enable third-party verification applications to access childrens' data. By requiring parental consent before allowing a child under sixteen years of age to open a social media account, businesses may be forced to accumulate personal information they don't want to collect and consumers don't want to give, and that data collection creates extra privacy and security risks for everyone, including children. Furthermore, implementing a parental consent requirement would likely require a verification process, and some states have considered measures that would authorize or even mandate the use of a third-party verification application, which would once again require the harvesting of childrens' sensitive data, this time sharing that private information with potentially unvetted and questionable operators, raising security concerns.

3. The Attorney General's office should have exclusive authority on enforcement.

² Amy Orben *et al.*, *Social Media's enduring effect on adolescent life satisfaction*, PNAS (May 6, 2019), <https://www.pnas.org/doi/10.1073/pnas.1902058116>.

³ Monica Anderson *et al.*, *Connection, creativity and drama: Teen life on social media in 2022*, Pew Research Center: Internet, Science & Tech (Nov. 17, 2022), [https://www.pewresearch.org/internet/2022/11/16/connection-creativity-and-drama-teen-life-on-social-media-in-2022/..](https://www.pewresearch.org/internet/2022/11/16/connection-creativity-and-drama-teen-life-on-social-media-in-2022/)



Any legislation must place the sole enforcement authority with the Attorney General’s office, in order to avoid creating any punitive financial incentives and the potential for a flood of frivolous claims that could clog up Connecticut’s courthouses.

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We appreciate the Joint Committee’s consideration of these comments and stand ready to provide additional information as the Legislature considers proposals related to technology policy.

Sincerely,

Khara Boender
State Policy Director
Computer & Communications Industry Association