



November 16, 2023

To whom it may concern,

Thank you for the opportunity to share input on how to promote a healthier, safer, and more private experience for kids and teens online. We are grateful to the National Telecommunications and Information Administration and the Task Force on Kids Online Health & Safety for your ongoing work on this critical issue.

This comment is submitted by Design it For Us, a coalition of young activists and organizations advocating for safer social media and online platforms for kids, teens, and young adults.¹

Our coalition first came together last year when two leading youth-led organizations, LOG OFF and Tech(nically) Politics, joined forces to build a multi-tiered campaign in support of the bipartisan California Age Appropriate Design Code (AADC) — the most comprehensive tech accountability bill to pass anywhere in the United States this century. Since helping to secure unanimous passage of the AADC, we have expanded our work to elevate young people’s voices and push for reforms that will protect those most impacted by tech policy: kids, teens, and young adults.

Our team is made up of activists between 18 and 26 years old, and as digital natives, we all have first-hand experience with the benefits and dangers of social media. We grew up in a world where adults didn’t always understand the power and influence social media could have on our well-being, and where lawmakers who should have taken action to protect us when harms became evident largely remained silent – placated by vague safety commitments from Big Tech companies that they failed to uphold time and time again.

As a result, a generation of Americans have grown up in a social media ecosystem rife with dangers and few guardrails.

Young people can — and do — find connection, entertainment, and a wealth of information online. But those benefits come at an unacceptably high cost for too many of our peers. According to an advisory² from the U.S. Surgeon General earlier this year, 95% of kids between the ages of 13 and 17 use social media, 46% said it made them feel worse about their body image, and 64% said it “often” or “sometimes” exposes them to hateful content. Report after report demonstrates social media exposes young people to hateful and harmful content that degrades their image of themselves, radicalizes and divides, and leaves them spiraling in an endless loop of addictive content.³

The body of research on the harms of social media platforms extends back before some of our members had even entered high school. And still, tech giants have all but supercharged harmful

¹ <https://designitforus.org/about/>

² *The U.S. Surgeon General’s Advisory: Social Media and Youth Mental Health* (May 23, 2023) <https://www.hhs.gov/sites/default/files/sg-youth-mental-health-social-media-advisory.pdf>

³ *The Facebook Papers* (2021) <https://facebookpapers.com/>

practices. Just this month, a whistleblower from Meta revealed that top executives were repeatedly warned by employees and troves of internal data about a horrific reality: that on any given week, one in eight young teens were exposed to unwanted sexual advances on one of their platforms.⁴ Rather than taking all necessary action to address this scourge, Meta made it harder to report abuse and cut back on internal research and information-sharing.

Young people are not collateral damage in Big Tech's never-ending pursuit of higher profits.

We applaud the NTIA for its work and are eager for your next steps, which we trust will welcome young voices and help to ensure that the next generation of young Americans can enjoy the freedom of responsible technology without the burden of lasting psychological and developmental harms. This comment represents those critical voices that deserve a role in helping to safeguard our future online, and as such is informed by and directly representative of the collaborative input and personal experiences of young people from across the country.

I. Summary of harms

The negative impacts social media has on young people are well-documented. Multiple studies have revealed that even modest amounts of exposure to online platforms can wreak havoc on young people's mental health — and many use these platforms for much longer amounts of time than what is considered safe.⁵ Unfortunately, that is by design. Big Tech's surveillance advertising business model relies on engagement, and platforms are designed to keep users clicking. As a result, young people are exposed to a near-endless barrage of content — which can oftentimes include negative messages about themselves and their bodies — to keep them clicking. Platforms are designed to be addictive because Tech giants make money through higher engagement — and it's working.

According to a YouGov poll of American teenagers conducted by Accountable Tech, 74% of teens found themselves scrolling for too long, 59% get pulled back into apps after they log off by push notifications, 66% feel they lose track of time because of social media, and over 50% lose sleep because they feel “stuck” on social media.⁶

These and other features of the social media experience have helped contribute to a mental health crisis for teens and young adults in the U.S. Some of the well-documented outcomes for young people include:

- **Higher rates of depression, anxiety, and mood disorders.** Social media use has been shown to lead to higher rates of depression, anxiety, and mood disorders for young people –

⁴ Horwitz, Jeff, *His Job Was to Make Instagram Safe for Teens. His 14-Year-Old Showed Him What the App Was Really Like*, Wall Street Journal (November 2, 2023)

<https://www.wsj.com/tech/instagram-facebook-teens-harassment-safety-5d991be1>

⁵ Rothwell, Jonathan, *Teens Spend Average of 4.8 Hours on Social Media Per Day*, Gallup (October 13, 2023), <https://news.gallup.com/poll/512576/teens-spend-average-hours-social-media-per-day.aspx#:~:text=Across%20age%20groups%2C%20the%20average,4.4%20hours%2C%20respectively>.

⁶ *Prevalence of Design Harms Among Young People*, Accountable Tech and LogOff (March 29, 2023) <https://accountabletech.org/research/prevalence-of-design-harms-among-young-people/>

particularly those in the early stages of adolescence.⁷ One study found that kids between the ages of 12 and 15 are twice as likely to experience mental health challenges like depression if they use social media for more than three hours per day — well below the average amount of time the average young person spends online.⁸ Studies have also shown a link between excess social media use and attention deficit hyperactivity disorder (ADHD) in adolescents.⁹

- **Negative body image and poor self-esteem, particularly in adolescent girls.** Adolescent and teen girls who use social media are more likely to experience disordered eating, negative body image, and low self-esteem than their peers.¹⁰ In one survey, more than half of girls aged 12 to 17 said social media makes them feel worse about their bodies and many also report higher rates of online harassment and cyberbullying.¹¹ In another survey, nearly 75% of adolescents said platforms could do a better job of addressing harassment and cyberbullying.¹²
- **Increased rates of suicidal ideation and loneliness.** Experts have linked excessive social media use in kids and teens to lowered capacity for human communication and social skills as well as increased feelings of loneliness and social isolation.¹³ Adolescents who use social media are also more likely to engage in suicidal ideation.¹⁴
- **Poor sleep quality and disrupted neurological development.** Thanks to their addictive design, social media platforms often keep young people online well after dark and are linked to poor sleep quality and duration, especially for adolescents who are still in the formative years of brain development. As a result, these young minds can suffer from altered neurological development and increased depressive symptoms.¹⁵
- **Poor academic performance.** A new study of school-aged kids found that regular use of popular platforms like Snapchat and Instagram led to a drop in academic performance.¹⁶

⁷ *The Truth About Teens, Social Media and the Mental Health Crisis*, NPR (April 25, 2023)

<https://www.npr.org/sections/health-shots/2023/04/25/1171773181/social-media-teens-mental-health>

⁸ Riehm, Kira E., et. al., *Associations Between Time Spent Using Social Media and Internalizing and Externalizing Problems Among US Youth*, *Journal of the American Medical Association* (September 11, 2019)

<https://jamanetwork.com/journals/jamapsychiatry/fullarticle/2749480>

⁹ Chaelin K. Ra, et. al., *Association of Digital Media Use With Subsequent Symptoms of Attention-Deficit/Hyperactivity Disorder Among Adolescents*, *Journal of the American Medical Association* (July 17, 2018)

<https://doi.org/10.1001/jama.2018.8931>

¹⁰ Holland, Grace, et. al., *A Systematic Review of the Impact of the Use Of Social Networking Sites on Body Image and Disordered Eating Outcomes*, *Journal of the American Medical Association* (June, 2016)

<https://doi.org/10.1016/j.bodyim.2016.02.008>

¹¹ Bickham, David et. al., *Adolescent Media Use: Attitudes, Effects, and Online Experiences*, Boston Children's Digital Wellness Lab (August, 2022)

https://digitalwellnesslab.org/wp-content/uploads/Pulse-Survey_Adolescent-Attitudes-Effects-and-Experiences.pdf

¹² Vogels, Emily A., *Teens and Cyberbullying 2022*, Pew Research Center (December 15, 2022)

<https://www.pewresearch.org/internet/2022/12/15/teens-and-cyberbullying-2022/>

¹³ Albano, Anne Marie, *Is Social Media Threatening Teens' Mental Health and Well-being?*, *Health Matters* (May 20, 2021) <https://www.cuimc.columbia.edu/news/social-media-threatening-teens-mental-health-and-well-being>

¹⁴ Dyer, Clare, *Social Media Content Contributed to Teenager's Death "In More Than A Minimal Way," Says Coroner*, *BMJ* 2022;379:o2374 (October 30, 2022) <https://doi.org/10.1136/bmj.o2374>

¹⁵ Maza, M. T. et. al., *Association of Habitual Checking Behaviors on Social Media With Longitudinal Functional Brain Development*, *JAMA pediatrics*, (January 3, 2023) <https://doi.org/10.1001/jamapediatrics.2022.4924>

¹⁶ Gordon, Mellissa S., et. al., *Social Media Use and Early Adolescents' Academic Achievement: Variations by Parent-Adolescent Communication and Gender*, *Youth and Society* (June 21, 2023)

<https://journals.sagepub.com/doi/10.1177/0044118X231180317>

The study showed a clear pattern: as the use of each of these platforms increased, school performance dropped significantly.

- **Increased exposure to hate-based content.** Research also shows that young people are frequently bombarded with hate-filled rhetoric that can normalize prejudice and violence. A recent survey found that roughly two-thirds of adolescents are “sometimes” or “often” exposed to hate-based content online¹⁷ and kids of color face increased exposure to racist slurs and other content.¹⁸ It’s a steady flow of hateful rhetoric that can normalize prejudice and violence and deepen social divisions between young people from different backgrounds.

Many of the harms outlined above can silently affect young people for months or even years before parents and trusted adults realize what’s happening. It takes courage to come forward and share a personal experience about the impact of social media, but many young people share their painful stories because they are desperate for action.

Design It For Us invites kids and teens to tell their personal stories about the role tech plays in their lives, to turn them into collective action and initiatives like this comment. As one member bravely shared:

- ***“Social media has caused so much pain for me. Growing up I lost 10 friends to suicide, and the landscape on social media was terrible. Our grief became a competition, and the amount of photos you had with that person signified how close you were. People were endlessly bullying each other, and I got told that one of my friends who passed away never even liked me and that I don't have the right to post about her. It became vicious. I was exposed to horrible suicidal content in middle school when I was struggling with my mental health, and it made me go down a bad path. The glamorization of self harm really made it attractive for me. I also did hundreds of thigh gap challenges recommended to me on social media in middle school and got terrible body dysmorphia from it. Social media has severely impacted the way I function and has made living life much more difficult.”***

And yet, there are also more overt dangers that await as young people explore unregulated tech like generative AI. Earlier this month, a group of teenage boys circulated AI-generated images that appeared to depict nude female classmates, and the same is happening in communities across the country. These incidents paint a visceral picture of what technology without guardrails can lead to and demand urgent action.¹⁹

¹⁷ Rideout, V., et. al., *Social Media, Social Life: Teens Reveal Their Experiences*, Common Sense Media (2018)

<https://www.common Sense Media.org/sites/default/files/research/report/2018-social-mediasocial-life-executive-summary-web.pdf>

¹⁸ Nesi, Jacqueline, et. al., *How Girls Really Feel About Social Media*, Common Sense Media (2023)

<https://www.common Sense Media.org/sites/default/files/research/report/how-girls-really-feel-about-social-media-research-report-final-1.pdf>

¹⁹ Jargon, Jullie, *Fake Nudes of Real Students Cause an Uproar at a New Jersey High School*, New York Times (November. 2, 2023)

https://www.wsj.com/tech/fake-nudes-of-real-students-cause-an-uproar-at-a-new-jersey-high-school-df10f1bb?mod=tech_lead_story

II. Summary of Benefits

To be sure, social media and other online experiences can lead to meaningful positive outcomes for young people, too. According to Harvard's T.H. Chan School of Public Health, "routine" social media use – defined as checking social media infrequently and responding to content sent personally to you – leads to social well-being, mental health, and self-rated health benefits.²⁰

If used responsibly — with the right safeguards and in moderation — social media *can* help youth connect with friends and peers around the world, leading to strong online communities, reduced rates of social isolation, and increased feelings of belonging. This is especially true for marginalized and minority communities who may be cut off from peers who can relate most directly to their experiences. As the American Psychological Association has noted, suicide prevention research shows the importance of young people knowing they aren't alone, and social media has a critical role to play in establishing social connection.²¹

In a submitted contribution to this comment, one supporter noted:

- ***“Social media has helped me figure out who I am. My family does not speak about mental health issues and we have a chronic background of issues. I’ve been able to find resources and a community that continuously saves my life. Free access to the internet is so important to bring people from everywhere together showing how we are all so similar but different in every way possible.”***

Social media also makes a near infinite amount of educational information and resources available to young people, which can result in transformational personal and intellectual growth and create opportunities for young people to be more informed and engaged citizens. Despite the role social media has played to stress-test trust in our democratic institutions and our information ecosystem, Pew Research found that a median 57% of global internet users believe that social media has “been more of a good thing for their democracy,” and that is especially true for people between the ages of 18 and 29. The same study found that young people are also more likely to say that social media has made “people more accepting of others from different backgrounds” than their older counterparts.

The educational benefits of social media are a common theme across many of the submissions Design it For Us collects. As one young person noted:

- ***“I want the internet for education and understanding our world, and the many different and beautiful types of people creating positive lifestyles.”***

The benefits of social media can be more fully enjoyed by those of all ages with a few course corrections and guardrails. As the MIT Center for Constructive Communication's Professor of

²⁰ Bekalu, Mesfin A., et. al., *Social Media Use Can be Positive for Mental Health and Well-Being*, Health Education & Behavior (November 19, 2019) <https://journals.sagepub.com/doi/full/10.1177/1090198119863768>

²¹ Weir, Kirsten, *Social Media Brings Benefits and Risks to Teens. Here's How Psychology Can Help Identify a Path Forward*, American Psychological Association (September 1, 2023) <https://www.apa.org/monitor/2023/09/protecting-teens-on-social-media>

Media Arts and Sciences, Deb Roy recently wrote, “we can and should create social networks designed for public discourse that prioritize inclusion, where underheard voices and perspectives can flourish, and where people take and offer disagreement in good faith. Ad-supported social media is not the only game in town, nor should it be. Scalable, sustainable business models, including not-for-profit models and publicly funded models, are not just possible, but desperately needed.”²²

III. Industry Efforts

Greater public and private action is necessary to leverage those benefits and mitigate the clear harms social media is having on young people. Congress has failed to enact even a single piece of federal legislation to protect kids online in the past 25 years despite strong bipartisan support. The reasons for that inaction range from political parlor games to Big Tech lobbying blitzes.²³

But in the meantime, private companies have made a number of safety commitments to protect children on their platforms – acknowledging their role in ensuring the safety of their products. Incidentally, these noble statements are rarely made proactively. Most often they come dressed in clever public relations campaigns as damage control efforts *after* damning revelations about some harm that could have been prevented.

In 2019, for example, Google’s YouTube committed to making “protecting kids and their privacy” the company’s number one priority — the commitment came just after Google was hit with a \$170 million fine for illegally collecting data on minors and selling it for profit.²⁴ The company agreed to stop selling personalized ads on children’s content, but just four years later, researchers found evidence that Google was continuing to target children. In response, Google told *The New York Times* that it was “useful to run ads for adults on children’s videos because parents who were watching could become customers” – a direct contradiction of their 2019 commitment.²⁵

A similar story played out at Meta. Despite claiming to prioritize child safety online, Facebook ignored internal research warning about the dangers Facebook and Instagram pose to teen mental health, and continued to design its products to keep users maximally engaged.²⁶ Facebook also sold data collected from children to advertisers that exposed kids to advertisements for alcohol, tobacco, and gambling.

²² Roy, Deb, *The Internet Could Be So Good. Really.*, The Atlantic (October 17, 2023) <https://www.theatlantic.com/technology/archive/2023/10/social-media-platforms-business-models-dialogue-network/675655/>

²³ Wu, Tim, *Why Congress Keeps Failing to Protect Kids Online*, The Atlantic (October 30, 2023) <https://www.theatlantic.com/technology/archive/2023/10/protect-children-online-social-media-internet/675825/>; *Big Tech’s Scramble to Stop Child Safety Laws*, Tech Transparency Project (May 3, 2023) <https://www.techtransparencyproject.org/articles/big-techs-scramble-to-stop-child-safety-laws>

²⁴ Wojcicki, Susan, *An update on kids and data protection on YouTube*, YouTube (September 4, 2019) <https://blog.youtube/news-and-events/an-update-on-kids/>; Singer, Natasha, et. al., *Google Is Fined \$170 Million for Violating Children’s Privacy on YouTube*, New York Times (September 4, 2019) <https://www.nytimes.com/2019/09/04/technology/google-youtube-fine-ftc.html>

²⁵ Grant, Nico, et. al., *YouTube Ads May Have Led to Online Tracking of Children, Research Says*, New York Times (August 17, 2023) <https://www.nytimes.com/2023/08/17/technology/youtube-google-children-privacy.html>

²⁶ *Online Child Protection*, Meta (2023) <https://about.meta.com/actions/safety/onlinechildprotection/>; Wells, Georgia, et. al., *Facebook Knows Instagram Is Toxic for Teen Girls, Company Documents Show*, Wall Street Journal (September 14, 2021) <https://www.wsj.com/articles/facebook-knows-instagram-is-toxic-for-teen-girls-company-documents-show-11631620739>

Without meaningful federal legislation to protect kids online, this pattern of broken promises is likely to continue. We've seen how robust legislative reform is compelling companies to change their behavior after the passage of the Digital Services Act in the European Union.

Companies are changing their behavior to ensure they are abiding by the provisions of the Digital Services Act (DSA), which requires platforms to give alternatives to automated recommendation systems and prohibits platforms from using children's data and online activity to target them with personalized ads. In effect as of August of this year, platforms are taking meaningful measures like giving greater data access to researchers and limiting the use of personalized ads for select customers in young age groups to course correct in Europe, but more must be done here in the U.S..²⁷

In order to shape the most effective legislation, it's important to focus on reforms that address safety at the point of design, rather than reforms that restrict user access. The future of online experiences should not be about blocking access, but about better guardrails. Informed by our experiences online – our expertise, we recently published a detailed policy platform with guiding principles we believe will help hold Big Tech accountable for what it is — or isn't — doing on safety. To do that, policymakers should:²⁸

- Require platforms to uphold the highest safety standards by design and by default;
- Address the business model employed by social media companies to rely on surveillance advertising that leads to the exploitation of young people's well-being in pursuit of profits;
- Provide and prioritize user agency to ensure that young people are empowered to make their own choices about their online experience;
- Demand that platforms deprioritize algorithmic and engagement-based mechanisms and hold companies and platforms accountable for manipulative algorithmic features that amplify harmful content and addict users;
- And give users comprehensive and unconditional ability to have visibility into and control of their personal information at any moment or point of use on social media.

As one of our supporters makes clear:

- ***“I think the best way to protect people online is to make these platforms less addictive, and incentivize them not just to design for watchtime but also the well-being of their users.”***

²⁷ Roth, Emma, *The Eu's Digital Services Act Goes Into Effect Today: Here's What That Means*, The Verge (August 25, 2023) <https://www.theverge.com/23845672/eu-digital-services-act-explained>

²⁸ Design is For Us Policy Platform (2023) <https://designitforus.org/resource/policy-platform/>

IV. Conclusion

We are long overdue for meaningful reform. And while there will be a long road ahead, there are legislative opportunities on the table right now that Congress can and should pass, including the Kids Online Safety Act and Children, The Kids PRIVACY Act, and Teens' Online Privacy Protection Act 2.0.. We cannot afford to wait for the next mea culpa from tech companies more interested in managing their public image than protecting kids from devastating health consequences. The pace of technological change in the last two decades alone has made our current laws protecting privacy and life online obsolete — a trend that is slated to only get worse as generative AI technology continues to advance.²⁹

Each of us grew up in a world with few safeguards to ensure safe experiences online, but our coalition is founded on the belief that we can still turn the tide — and our win in California with the AADC is evidence of that. Our hope is that our comment and this body's work will push for action from lawmakers and demand that Big Tech put the well-being of America's young people above their bottom lines.

²⁹ Jargon, Jullie, *Fake Nudes of Real Students Cause an Uproar at a New Jersey High School*, New York Times (November. 2, 2023) https://www.wsj.com/tech/fake-nudes-of-real-students-cause-an-uproar-at-a-new-jersey-high-school-df10f1bb?mod=tech_lead_story