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1850 M Street NW 12th Floor Washington, DC 20036 (202) 326–6000 www.naag.org March 28, 2022

Matthew Penarczyk, Head of Legal, Americas

TikTok, Inc.

5800 Bristol Parkway, Suite 100 Culver City, California 90230

Michael O'Sullivan, General Counsel

Snapchat

2772 Donald Douglass,

Loop North Santa Monica, CA 90405

Dear Messrs. Penarczyk and O'Sullivan:

As we continue to prioritize keeping kids safe when they are online, we, the undersigned attorneys general for 44 states and territories, write to express our concern that your companies are not taking appropriate steps to allow parents to protect their kids on your platforms. Your platforms do not effectively collaborate with parental control applications ("apps") or otherwise provide an adequate opportunity for parental control within the platform. Many other platforms already allow parental control apps to monitor the content on their respective platforms. We ask that you conform to widespread industry practice by giving parents increased ability to protect their vulnerable children.

Both social media platforms and parents play major roles in preserving the safety of our youth online. Social media platforms monitor and remove posts that they deem offensive, and there are some controls that allow users to limit communication to a certain network of people. Parental controls and related apps, in turn, allow parents to monitor private messages on their children's accounts. To maximize the protection of children, parents and social media platforms must collaborate with each other and platforms should provide parents with the option of utilizing appropriate tools that they believe will protect their kids.

Children and teenagers are regularly subjected to online dangers, including cyberbullying, drug use, and sexual predation. Parental control apps can alert parents or schools to messages and posts on your platforms that have the potential to be harmful and dangerous.

Apps can also alert parents if their child manifests a desire for self-harm or suicide. On other platforms where these apps are allowed to operate appropriately parents have received notifications of millions of instances of severe bullying and hundreds of thousands of self-harm situations, showing that these apps have the potential to save lives and prevent harm to our youth.

Given the extensive vulnerabilities of your platforms, the protections afforded by apps are even more necessary. While your platforms incorporate some content moderation policies, there are areas, such as direct messaging, that are not monitored in the same way or to the same degree as other areas on your platforms. In addition, some of your internal parental control settings can be changed or bypassed and still allow inappropriate content. Furthermore, community guidelines do not generally apply to private messaging. Parental control apps access these features of your platform so that parents can better protect their children while they are using your sites.

Parental control is particularly essential on your sites due to the "Discover" and "For You" sections on your platforms, which propagate disturbing sexual content and explicit drug use to our youth.\(^1\) Often, the displayed sexual content can be extreme and has the potential to be harmful in a number of different ways. Content depicting abusive sexual relationships can seriously harm a child's view of a healthy relationship and can help perpetuate domestic abuse and human trafficking. We urge you to enhance your content moderation to screen out such content on your platform and to empower greater parental control. Parental control apps can give parents additional tools to try to help filter out much of this type of content.

Empowering parents is necessary in today's online environment, a place that can be considerably hostile for our youth. While our offices do not advocate for a specific parental control app, we recognize the value of allowing secure and credible parental control apps to assist with monitoring, especially on platforms like yours with vast amounts of content and with large number of youth users. Therefore, we strongly encourage your companies to immediately pursue collaboration with parental control apps and to implement stronger parental controls and content moderation within your platform.

This letter is not intended to address all concerns with your social media platforms nor is this letter intended to endorse any parental control app. We appreciate your prompt attention to this matter and look forward to your response.

Sincerely,

Mississippi Attorney General

Josk Stein

North Carolina Attorney General

¹ Rob Barry et al., *How Tik Tok Serves Up Sex and Drug Videos to Minors*, THE WALL STREET JOURNAL, September 8, 2021, https://www.wsj.com/articles/tiktok-algorithm-sex-drugs-minors-11631052944?mod=e2tw.

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