

## Joint Statement from Online Innovators

Before the Federal Trade Commission  
In the Matter of: COPPA Rule Review  
Docket No. 339, Project No.P104503

COPPA currently requires sites and apps directed to children to get parental consent before collecting children's personal information.

But under one proposed change, COPPA would be expanded to any site or app that is **“likely to attract an audience that includes a disproportionately large percentage of children under age 13 as compared to the percentage of such children in the general population.”**

Under this vague standard, a much larger number of sites and apps could be subject to COPPA's burdensome legal obligations. General-audience services dealing with music or popular topics like sports would have to worry about whether too many children find their content appealing. At the very least, the proposal will leave site and app developers in a state of extreme uncertainty - it's difficult, if not impossible, for most sites and apps to know if they fall under this standard.

Sweeping in additional sites and apps that are liable under COPPA and creating an environment of uncertainty for developers will stifle the creation of dynamic and innovative online services.

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