



To:

Ashley Lin

Office of Science and Technology Policy

From:

Amina Fazlullah, Head of Tech Policy Advocacy

Ariel Fox Johnson, Senior Advisor, Data Privacy

Common Sense Media

699 8th St, Suite C150

San Francisco, CA 94103

Common Sense Media recognizes the benefits of safe and effective Artificial Intelligence (AI), and [believes that responsible policy on AI and children, especially in K-12, should be a top priority](#). It is critical, however, that AI is assessed for safety with respect to its specific uses and populations. Children are uniquely vulnerable, and AI tools used with and on them require special care. As AI is transforming how children learn and live, policymakers owe it to the next generation to set in place responsible policies that ensure that when and where this new technology is embraced, it is done in a manner that ensures all children's well-being, privacy, and safety is a priority.

With respect to children's privacy specifically, we reiterate the critical protections that the Children's Online Privacy Protection Act provides to young children. This law – which Common Sense has long supported and also supports strengthening – has thoughtful rules that address data practices that are technology neutral and equally beneficial in the AI context. COPPA is currently protecting kids: the Federal Trade Commission has been active in enforcing COPPA over the years, including under current Commissioner Ferguson, with two new settlements just announced in September 2025. Under COPPA, companies cannot collect, use, or disclose personal information from children under 13 without parental consent. This is a protection that is even more critical in a world of AI products that may be collecting information from young children, such as AI chatbots that can be embedded in toys such as teddy bears.

Without privacy protections, especially for young people, there will not be trust in technology, including AI. Our [research](#) has uncovered a significant trust deficit between teens and major technology companies. About six in 10 teens express doubt that tech companies will prioritize their mental health and well-being over profits, and nearly half lack confidence in these companies' ability to make responsible decisions about AI use. And trust is critical to the advancement of AI. With [more adults](#) currently concerned about the risks than the benefits of AI, we urge you to recognize the critical importance of COPPA's protections as a fundamental component to supporting the widespread use of all tech innovations moving forward.

Thank you for reviewing our comments. We welcome any opportunity to discuss what we can do to best support children and families as they seek to make meaningful and safe use of AI innovations.