Thank you for inviting the Center for Media Education to testify before this Commission. My name is Amy Aidman and I am the Research Director for the Center for Media Education. I am very pleased to represent CME’s views on “The Child on the Web: Privacy and Protection.” CME is a national non-profit public interest organization based in Washington D.C. dedicated to improving the quality of electronic media, especially on behalf of children, their families, and the community.

Online Privacy for Children and Teens

Testimony
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Web-based Education Commission
by
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The Center for Media Education’s tracking of privacy practices on children’s Web sites was instrumental in alerting the Federal Trade Commission to unfair practices and ultimately played a role in the conceptualization of the Children’s Online Privacy Protection Act (COPPA), the first and only existing federal online privacy legislation. COPPA, which went into effect in April of this year, regulates the collection of personal information from children under the age of 13. It requires commercial Web sites targeted at children under 13 to secure parental permission before collecting, using, or disclosing personal information from children. Web sites must also post a privacy policy detailing what personal information is being collected, how it is to be used, and if it will be given to third parties. Through our kids privacy Web site (www.kidsprivacy.org) we are helping parents to protect their children’s privacy and to understand the scope of the law.

COPPA, however, does not cover teens. Adequate and age-appropriate privacy protections for teenagers are still needed. Teenagers are a vulnerable age group that deserves protections from data collectors. They constitute a highly lucrative market –one
that is sought after by data collectors. An estimated teen population of 30 million spend an estimated $150 billion annually.† Youth online spending (ages 16-22) is predicted to be $4.5 million in 2000." CME has just completed a study of teens and the Internet that will be released later this year. It is clear from our research that marketers are targeting teens with a variety of new interactive strategies to involve them in the online consumer culture.

Teenagers do not suddenly become more privacy savvy once they turn 13. A recent study released by the Annenberg Public Policy Center points to teens’ readiness to provide access to personal information when offered a free gift. According to the report, young people seemed concerned about protecting their information privacy and nervous about Web sites’ having information about them. However when they were offered the scenario of getting a free gift in exchange for personal or family information, many more children than parents were willing to provide it. Privacy is a concept that is clearly understood differently by children and adults.

At the same time, however, teenagers should have some privacy rights of their own in the family context. We agree with other organizations that do not want to require Web sites to notify parents when teens supply personal information online. But we do believe that teens are entitled to fair information practices and that requiring such practices will help ensure that these young people become thoughtful, responsible consumers. At the very least, teenagers should be directly provided with: easily understood notice of privacy policies, opt-in option rather than opt-out, access to the information already collected, and the opportunity to correct, prevent or curtail the use of their personal information.

**Filtering and Blocking**

While technological tools, such as filtering systems, may be useful for protecting children and teens from some inappropriate materials in home settings, our research shows that at this point in their development, filters still allow in some undesired content, while inadvertently blocking content that one might want. As such, filtering software should be viewed as only a partial solution—one that involves choices to be made by individual families to suit their specific needs. A more effective long-term goal involves finding good ways to create closed noncommercial, high-quality educational zones that will be readily available and easy to use by educators, parents, and children.

**Commercial-free Zones**

Discussions about “safe zones” for children on the Internet have tended to frame the concept of quality around the absence of harm. If a product, program, or Web site contains no violence, sex, or other inappropriate material, then its very “benign-ness” is often labeled “quality.” It is time to begin thinking more broadly about quality, to help in
developing criteria for how the overall media culture should help prepare young people for their adult lives.

Given current trends, there is little doubt that this emerging media system will play a significant role in helping children become consumers. But in a time of declining voter participation and great cynicism about the political process, can the media also be a positive force in helping to raise the next generation to be more engaged as citizens, contributing to the health of our democracy? The new digital media—with their powerful ability to engage children in active learning, to foster community, and to enable children to become creators and communicators instead of just passive recipients—should be structured in such a way as to foster the development of thoughtful, active citizens.

A key to achieving that goal will be the development of a healthy, noncommercial sector in the new media landscape.

There are many promising content areas for children on the Web that could provide the basis for such an “electronic commons,” however, there are also serious questions about whether they can be sustained over the long run, and whether they can become a significant and prominent part of the new media landscape. With the growing commercialization of the Web, the viability of noncommercial media for children and youth is by no means guaranteed, and may very well be threatened in the new environment. In response to that concern, the Center for Media Education has launched a new initiative dedicated to research and organizing to crystallize thinking about how to sustain noncommercial and civic media sectors for youth in the digital landscape.

Public Education and Professional Support

Public education is vital to help educators and parents work with young people to take advantage of the many wonderful resources available through the Web, and also to alert them to the potential dangers to their privacy. The Center for Media Education is committed to ongoing public education efforts through collaboration with leading education and parenting organizations. We work with our colleagues in the Children's Media Policy Network to bring public attention to a wide array of issues relating to young people and media. Public education and awareness are key as we move into this digital era. We commend the Federal Trade Commission’s public education initiatives surrounding COPPA and look forward to similar efforts related to schools and privacy.

A new kind of information professional is needed to help teachers through the masses of Web-based material. While 95% of schools now have Internet access, just over a third of public school teachers think that they are prepared to use computers and the Internetiv. It will take time for teachers to gain the skills they need to access and evaluate material, especially considering the difficulty still involved in navigating the Web.
Schools need trained library-media specialists to support teachers in finding high-quality resources. And both teachers and library-media specialists need expert support through government funded services. For example, AskERIC, an electronic resource and referral service, funded primarily through the US Dept of Education and with some corporate support, takes advantage of the interactive features of the Internet to support teachers, parents, librarians and others interested in finding education information on the Internet in a highly individualized way. Users of the service submit a question by email and within two working days receive information about relevant documents and articles, referrals to appropriate organizations, links to Web sites, as well as full text documents that are in the public domain. A service like AskERIC is important now when so many people are learning their way around the Internet because it provides scaffolding to help Internet novices become more competent in conducting their own online research.

Ratings

Ratings can be useful tools, but they are no silver bullet, especially when it comes to the complex environment hosted online. Voluntary ratings systems can play a positive role in helping to aggregate high-quality educational and informational content, and they may also be able to play a role in helping to cordon off inappropriate content. However, it is too early in the unfolding of the Internet to know which kind of rating system will be the most effective or even to know if there is one best rating system. We need to know more about the kinds of activities in motion on the Internet before we can begin to classify with that kind of certainty.

Online Advertising and Privacy in Schools

While teachers and administrators are understandably anxious to acquire the computers, software, and online connections needed to help students stay on the cutting edge, there are important considerations that come into play. A number of companies are offering schools help in acquiring this technology. In some cases schools agree to provide access to students’ personal information, submit students to viewing online advertising, or to more passive involvement in building brand loyalty. Contracts with commercial enterprises to provide the technology should not be entered into lightly when the price is subjecting students to online advertising or to allowing corporate marketers to mine students’ private personal information. Schools have an obligation to help to protect all students’ privacy in this new online environment. It is vital to support noncommercial educational ventures, so that school administrators are free to choose the systems that work best for their needs.

Specific Policy Recommendations
We urge the Commission to recognize the importance of making a commitment to institutionalizing and sustaining noncommercial space for use in education on the Internet. The government can help by:

- supporting legislation to protect the online privacy of all citizens, including teens;
- fostering commitment and supporting funding for sustaining a high-quality, safe non-commercial online culture for children;
- allocating funding for research on the issue of youth and new media;
- developing and sustaining government funded services to support educators and parents information needs; and
- training of instructional media professionals.

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1 Wendy Bounds, "Cashing In on Youth: Kids Today Boast Big Clout With Marketers," The Wall Street Journal Interactive 9 August 2000

