

September 17, 2013

Edith Ramirez
Chairwoman
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Chairwoman Ramirez:

As organizations concerned about the health and welfare of America's teens, we urge you to protect this vulnerable group from the proposed new Facebook policy on marketing and advertising. Facebook's policy will give it permission to use the name, profile picture, content, and other actions of teens (and all other users) for commercial purposes without compensation. It also requires 13-to-17-year-olds, as a new condition of service, to "represent that at least one of your parents or legal guardians has also agreed to the terms of this section (and the use of your name, profile picture, content, and information) on your behalf." The FTC, which has acknowledged that teens require special privacy safeguards, must act now to limit the ways in which Facebook collects data and engages in targeted marketing directed at adolescents. It should prevent Facebook from imposing unfair terms on teens and their parents that place them in a position of having to say they secured informed, affirmative consent from a parent or guardian.

It is essential, when teens are involved, that the FTC ensure that Facebook is engaged in fair marketing practices, including its terms of service. Facebook has positioned itself to take full commercial advantage of all the social interactions of adolescents on its online platforms, using a myriad of data-enabled marketing techniques little understood by the average user. Facebook is surely aware that teens will have little time to review these proposed changes, or even become knowledgeable about them before their profiles, photos, and social actions automatically become wholesale fodder for commercial use. As you and the commission know, scholarly research has documented the developmental and cognitive vulnerabilities of adolescents. For example, teens are highly influenced by the choices and preferences of their peers, and can often act impulsively. They should not be subjected to the same range of sophisticated ad-targeting practices that Facebook imposes on adults.

We call on the Federal Trade Commission to critically examine and redress these new changes proposed by Facebook. The commission must enforce its 2011 Consent Decree with Facebook to protect the interests of teens.

Cordially,

African American Collaborative Obesity Research Network
American Academy of Child and Adolescent Psychiatry
American Academy of Pediatrics
Benton Foundation
Berkeley Media Studies Group
Campaign for a Commercial-Free Childhood
Center for Digital Democracy
Center for Global Policy Solutions
Center for Media Justice
Center for Science in the Public Interest
Children's Advocacy Institute
Children Now
Consumers Union
Consumer Watchdog
Corporate Accountability International
Pediatrics Now
Prevention Institute
Public Citizen
Public Health Advocacy Institute
Public Health Institute
Media Alliance
Media Literacy Project
Mercy Hospital's Young People's Healthy Heart Program
National Collaboration for Youth
Shaping Youth
United Church of Christ, OC Inc.
Yale Rudd Center for Food Policy and Obesity

cc: Commissioner Julie Brill
Commissioner Maureen K. Ohlhausen
Commissioner Joshua D. Wright