



NATIONAL CENTER ON SEXUAL EXPLOITATION

May 7, 2026

Dear Majority Leader Thune, Minority Leader Schumer, Chair Cruz, Ranking Member Cantwell, Speaker Johnson, Minority Leader Jeffries, Chair Guthrie, and Ranking Member Pallone:

We write on behalf of a broad coalition of child-safety advocates strongly urging you to oppose the “Parents Over Platforms Act” (POPA, S. 4349/HR. 6333), recently introduced by Senators Jerry Moran and Jacky Rosen and Representatives Auchincloss and Houchin. We share their commitment to protecting children online. **But a careful reading of the text shows that POPA was not written for families. It was written for the tech industry.**

The App Association and the Chamber of Progress—trade groups representing Apple and Google—have enthusiastically endorsed POPA. Nearly every reputable child-advocacy organization opposes it. **When companies that have consistently failed to protect children from app-store harms enthusiastically endorse legislation, there is cause for alarm.** The bill text makes clear why they are cheering.

The coverage framework is built on an honor system. Under Section 102(b)(1), developers simply self-report whether their app qualifies as a “Covered Application.” There is no verification process and no penalty for opting out. Even worse, the bill creates the perverse incentive for developers to eliminate any child protection they may have. By exempting from coverage every app that provides the same experience for a young child as an adult (see definition of covered application), the bill allows developers to avoid regulation by getting rid of existing protections for children. That means POPA will result in worse experiences for kids online than they currently have. Since POPA’s core obligations apply only to limited applications that developers voluntarily classify as adult-only or as offering differentiated experiences for minors, the protections are largely illusory.

The “age-verification” requirement is weak by design. Users are only required to “declare their age,” with no obligation to actually verify it. Worldwide studies consistently show that roughly 30 percent of children misrepresent their ages online. Relying on self-reported age is not a protection. ***It is the status quo that produced the crisis in the first place.***

Two decades of advances in age-verification technology make it entirely feasible to *verify* age once, securely, at the app-store level, the single most logical and least privacy-invasive place to do it. That is what the App Store Accountability Act would require, real age verification, and we strongly endorse that legislation.

POPA also allows Apple, Google, and other companies to continue entering contracts with minors. Under the bill, children can be enrolled in lengthy, non-negotiable terms of service that include arbitration clauses, liability waivers, recurring payment terms, and broad data-collection permissions, often granting developers access to a child’s location, contacts, photos, microphone,

and camera. This directly conflicts with the basic legal principle that minors lack capacity to enter binding contracts.

POPA also does nothing to fix the broken app rating system that parents rely on every day. Under the current regime, developers rate their own apps, and the ratings are routinely—and spectacularly—wrong. Tech Transparency Project investigations this year identified 47 nudify apps in Apple’s App Store and 55 in Google Play—over 30 were rated as suitable for children. These apps allow users to create non-consensual sexual imagery, and they have collectively been downloaded more than 705 million times and generated over \$117 million in revenue, a share of which Apple and Google take directly.

The ratings failures extend far beyond nudify apps. The *Wall Street Journal* found that 1 in 4 apps rated as safe for children actually contained violent or sexual games, anonymous chat, and suggestive content. An independent analysis found that 45% of the top 500 grossing apps carry App Store age ratings lower than the minimum age the developers themselves require in their own terms of service, and 74% carry ratings lower than their own privacy policies allow.

POPA is silent on all of this. It contains no requirement for accurate ratings, no meaningful safety disclosures, and no independent review. The App Store Accountability Act, by contrast, requires accurate, highly visible age ratings and safety disclosures so parents know what their children are downloading before they download it. POPA’s silence on ratings would protect developers and app stores at the expense of the parents and children they claim to serve.

POPA’s liability provisions ensure that no one is held accountable when protections fail. Section 201 shields app stores from liability for any erroneous age signal, any developer misconduct, and any failure to provide age verification attributable to “reasonable technical limitations or outages,” no matter how routine or preventable. App stores are explicitly not required to proactively identify which apps are covered. A “good faith effort” is all that is needed to claim full immunity. Enforcement is limited to the Federal Trade Commission; there is no private right of action and no role for state attorneys general. The bill does not even take effect until 24 months after enactment, allowing ongoing harms to persist for two more years.

Most damaging of all is Section 203, which bars states from maintaining or enforcing any law “related to the provisions of this Act.” This sweeping preemption wipes out stronger protections already on the books in UT, TX, LA and elsewhere, and prevents any state from doing better in the future. No parent asked Congress to strip their state of the ability to protect their children.

We urge you not to advance this legislation. Families do not need another framework designed to protect platforms from accountability. They need a real solution, and one already exists. The App Store Accountability Act was developed over several years with input from dozens of child-safety experts and legal scholars, is backed by more than 170 advocacy organizations, and is supported by 88 percent of American parents. It has already passed in Utah, Texas, Alabama, and Louisiana with broad bipartisan support, and is pending in Congress. We urge you to support the App Store Accountability Act and reject the Parents Over Platforms Act.

Respectfully,

A Butterfly Gets Her Wings Back
Texas

Alabama Policy Institute
Alabama

All Girls Allowed
Massachusetts

Allies Against Slavery
Texas

American Principles Project
Virginia

Anchor of Grace, INC
Oklahoma

Better Screen Time
California

Breaking Generational Cycles
Oregon, California, and Texas

Campaign Against Human Trafficking
Florida

Center for Online Safety
Washington

Chains Interrupted
Iowa

Child First Policy Center
Utah

Coalition Against Trafficking in Women
New York

Dance Awareness: No Child Exploited (DA:NCE)
California

Devin J Norring Foundation
Minnesota

Abolition Ohio
Ohio

Alexander Neville Foundation
Arizona

Alliance for a Better Future
Washington, DC

Alternative Solutions
Minnesota

American Youth Association
California

ANew Life International
Florida

Bilateral Safety Corridor Coalition
California

California Survivor Coalition
California

Center for Arizona Policy
Arizona

Center for Responsible Technology
Washington, DC

Cherish All Children
Minnesota

Christians United Against Human Trafficking
Florida

Consumer Action
California

David's Legacy Foundation
Texas

Digital Childhood Alliance
Georgia

Digital Childhood Institute
Utah

Educate and Empower Kids
New Mexico

Enough Abuse
Massachusetts

Ernestine's Daughter
Illinois

Fight to End Exploitation
Wisconsin

Foundation for Judicial Discretion
Louisiana

Free NOLA, Inc
Louisiana

G-Rated School
Utah

Justice Society
Idaho

Kansas Family Voice
Kansas

LifeStar
Utah

Love Never Fails
California

Maryland Coalition Against Pornography
Maryland

MasterWord Services, Inc.
Texas

Mentari
New York and California

Dr. Jill Manning Associates, PLLC
Colorado

Empowered Parents
Utah

Erik's Cause
California

Family Policy Alliance
Colorado

FLCAction
Florida

Freedom Movement
California

Global Hope 365
California

Healthy Screen Habits
California

Just Love Worldwide
Maine

Less than 3
South Carolina

Louisiana Family Forum
Louisiana

Lynn's Warriors
New York

Massachusetts Family Institute
Massachusetts

Memorial Hermann Medical Group
Texas

Michelle Johnson Consulting
Louisiana

More Too Life
Florida

National Center on Sexual Exploitation
Washington, DC

NC Stop Human Trafficking
North Carolina

NJ Coalition Against Human Trafficking
New Jersey

North Dakota Family Alliance
North Dakota

Nurses United Against Human Trafficking
Florida

Parents RISE!
Oregon

PA Unplugged
Pennsylvania

Poiema Foundation
Texas

Project STAND
Montana

Public Square Strategies
Florida

Reflective Spaces Ministry, Corp.
Florida

Scarlet Road
Washington

Social Media Harms LLC
Georgia

Stand Against Trafficking USA
North Carolina

MY House
Alaska

New Englanders Against Sexual Exploitation
Connecticut and **Vermont** chapters

NH Traffick-Free Coalition
New Hampshire

North Carolina Family Policy Council
North Carolina

Not On Our Watch Texas
Texas

Paradigm Shift Training and Consulting
Missouri

ParentsSOS
Massachusetts

Paving the Way Foundation
Florida

Power2Parent Union
Nevada

Protect Young Eyes
Michigan

Quickening
California

Resiliency Foundation
Indiana

Shared Hope International
Washington and **Washington, DC**

Southwest Florida Coalition Against Human Trafficking
Florida

State Representative Brandon Guffey
South Carolina

State Representative Ellen Troxclair
Texas

Street Grace
Georgia, Arizona, Texas, and Tennessee

Survivor Leader Network of San Diego
California

Tech Safe Solutions LLC
Oklahoma

The Carson J. Bride Effect
Arizona

The Institute for Family Studies
Virginia

The WellHouse
Alabama

TJP Advocacy
Texas

Turning Life On
Massachusetts

Utah Citizens for the Constitution
Utah

Walk Her Home
Pennsylvania

Wisconsin Family Action
Wisconsin

Yellowstone Human Trafficking Task Force
Montana

Stop Predatory Gambling
Massachusetts

Sudbury for Digital Balance
Massachusetts

Talk More. Tech Less
Texas

TexProtects
Texas

The Dragonfly Harbor
Louisiana

The Stop Trafficking Project
Kansas

Tin Man Ministries
Rhode Island

Truth In Education
Georgia

Unbound Now
Louisiana and Texas

Utah Parents United
Utah

Wealth Management Ministries-Prevention Works
Joint Task Force and Coalition
Virginia

Wyoming Family Alliance
Wyoming

Zoe Ministries
Delaware