



Campaign for a Commercial-Free Childhood

Annual Report

July 1, 2018 - June 30, 2019







## Dear Friend,

Just as this report was going to press, CCFC scored its biggest victory to date: thanks to our advocacy, the Federal Trade Commission fined Google \$170 million for illegally collecting and profiting from the use of children's personal information on YouTube. And even more important than the record-breaking fine, the settlement requires Google to stop collecting data and showing personalized ads on YouTube channels and videos directed at children.

This win has been in the making since April 2018, when we filed an FTC complaint documenting how YouTube was violating children's privacy law. Since then, we've met with FTC officials and built powerful coalitions of advocates and lawmakers. And now, as a direct result of CCFC's campaign, the number one kids' website in the world will soon have significantly less surveillance and kid-targeted behavioral advertising.

Of course, CCFC doesn't just work to protect children on YouTube – we also support families to help get kids the off-line, commercial-free time they need to thrive. In the following pages, you'll read not only about our successful efforts to hold Big Tech accountable, but also our biggest and best Screen-Free Week yet, and the inspiring work of our Children's Screen Time Action Network.

You'll also meet some of the incredible people who make CCFC's work possible: our all-volunteer work groups leading the way to create a better childhood for all children; the experts whose research scaffolds our advocacy; and of course, the donors whose financial support fuels all of our programs, from standing up to Silicon Valley Goliaths to hosting the world's biggest celebration of screen-free fun.

We're so grateful to have such passionate advocates working alongside us – including you. Together, we're getting closer every day to realizing our vision of childhood: one where kids can be kids, without interference from corporate marketers and attention-hijacking devices.

Thanks for all you do,

Angela Campbell, JD  
Board Chair, CCFC

Josh Golin  
Executive Director, CCFC







Alexa, Are You My Friend?

In 2017, CCFC stopped Mattel from releasing Aristotle, an always-on device designed to displace essential caregiving functions and live in kids' bedrooms from birth. This year, we set our sights on tech giant Amazon after the company released their first kid-targeted smart speaker, the Echo Dot Kids Edition.

With the help of our attorneys at the Institute for Public Representation at Georgetown Law, CCFC launched a full-scale investigation into the Echo Dot Kids. What we found was a privacy nightmare.

In clear violation of children's privacy law, Echo Dot Kids' privacy policies were confusing, contradictory, and sometimes even non-existent! We also learned that Amazon keeps children's voice recordings forever unless parents actively delete them. And, most shockingly, even when parents deleted the recordings, the device still "remembered" what it had learned!

We filed an FTC complaint detailing our findings, which made headlines around the world and spurred a bipartisan call for an investigation. And when Good Morning America aired our video showing Echo Dot creepily remembering things about kids it wasn't supposed to, Amazon made changes to the device: **thanks to CCFC, now when parents delete their children's personal information from Amazon, it actually disappears.**

#### Kids need:

- Privacy
- Caring, face-to-face relationships
- Open-ended play
- Boredom
- Exploration and discovery

#### Echo Dot Kids offers:

- Surveillance
- Mediated family relationships
- Branded play
- Engagement
- Algorithmically-curated recommendations

## A Voice for the Future

In January, our Melissa Campbell was the only advocate to speak at the Alexa Conference in Chattanooga, TN. Addressing an audience of technologists and developers, she explained how Echo Dot Kids is a lot like a Happy Meal, why it serves Amazon more than families, and how its core value of surveillance undermines kids' healthy development. "CCFC's viewpoint is critically important," said Bradley Metrock, CEO of Score Publishing and executive producer of the Alexa Conference (now Project Voice). "We need perspectives like theirs to help guide us and alert us as we develop the voice technologies that will shape the future."

## The Time is Now

The laws protecting kids from predatory marketing haven't kept up with sophisticated new technologies – but CCFC has. Now, we're getting Washington up to speed with new legislation, new policy, and a new fund dedicated to protecting children's privacy.

This year, CCFC became a founding member of Privacy and Digital Rights for All, a coalition of powerful consumer and civil rights advocates calling for real, robust privacy laws. **Unlike other privacy efforts, which are often guided by industry, our Framework for Comprehensive Privacy Protection and Digital Rights is driven by the needs of real people, not corporate profits.**

We also helped Senators Ed Markey and Josh Hawley propose the strongest restrictions on marketing to children in more than 20 years. Thanks to our input, their bill would change the internet for kids and teens as we know it. It would outright ban any targeted marketing to kids under 13, extend new privacy protections to teenagers, and actually hold companies like Google and Snapchat accountable when they illegally collect and profit off of kids' data. And to ensure enforcement, the bill would create a new division of the FTC dedicated exclusively to protecting children's privacy.

It'll take time and resources to get strong, child-first privacy protections enshrined in law, especially when Big Tech lobbyists are already flooding DC. That's why we're so grateful to the inaugural supporters of our Children's Privacy Fund, an initiative dedicated entirely to this critical work. To learn more, visit [www.commercialfreechildhood.org/privacyfund](http://www.commercialfreechildhood.org/privacyfund).

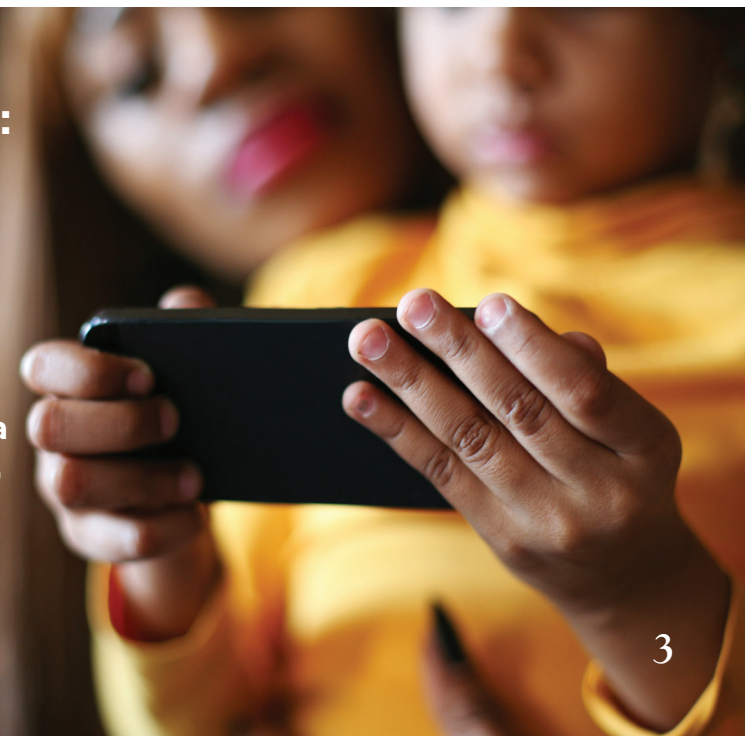
*"We have an obligation to establish enforceable safeguards that put kids' interests ahead of corporate interest in the Internet Age. Where the FTC fails, Congress must act swiftly and strongly to pass new legislation for children online."*

*– Senator Ed Markey (D-MA)*

## THE TIME IS NOW TO:

- **End targeted marketing to kids online**
- **Protect kids' and teens' personal information**
- **Hold Big Tech accountable for exploiting children's data**

**MAKE THE INTERNET SAFER FOR KIDS**





## Putting the “Action” in Action Network

CCFC launched the Children’s Screen Time Action Network in 2017 as a hub for parents and professionals to work together to give kids commercial-free time and space – and the dedicated advocates of our work groups are making it happen!

Seth Evans, a retired teacher and union activist, is the chair of the Action Network’s Screens in Schools work group. Seth’s commitment to the Action Network came directly from his classroom experience. **“As an upper elementary school teacher,” he says, “I really saw the effects of our screen-based culture on kids’ attention spans and learning readiness.”**

Now, he’s overseeing the group’s first project: a toolkit to stem the tide of splashy educational technologies that ultimately harm – not help – kids’ emotional and intellectual development.

The plan for the toolkit came to fruition at a Washington, DC, organizing meeting in March 2019. **“We’d been floating ideas for projects during our online meetings,” says Seth, “but we needed the momentum and commitment that could only happen by meeting face-to-face. We left that meeting not only better able to support each other, but also with a concrete plan to create something that we knew would benefit other would-be activists.”** The result is the Screens in Schools Toolkit, which offers research summaries, sample petitions, OpEd templates, and other resources to help parents, educators, and advocates shape the conversation about screens in their communities.

The Screens in Schools work group aren’t the only ones pooling their expertise and power to help kids: groups dedicated to Early Childhood, Parent Professionals, and Faith Communities are working hard on exciting new projects. And members of the Mental Health Professionals work group have successfully urged their professional organizations to address manipulative design in kid-targeted tech!



## Action Network LIVE! is a hit

Our Action Network Live! event series brings experts in child development, education, and technology into the living rooms of thousands of parents and advocates around the world. CCFC’s Jean Rogers hosts experts in psychology, health, and education to discuss topics ranging from defusing the social pressure to get kids smartphones, to how commercialism drives so many of the problems in children’s media.

One powerful event was Jean’s conversation with Cris Rowan and Hilarie Cash, a therapist and an occupational therapist, about how to limit the influence of screen time on kids’ development. One attendee was especially grateful for the “concrete, tangible actions, tips, and steps” offered by Cris and Hilarie. Another audience member exclaimed, “If everyone knew what Cris and Hilarie know...wow! What a better world we would have!”

*“Applause, applause, applause!  
As someone who is not an early  
childhood educator, I learned a  
great deal about core principles  
of child development and how  
they apply to life-changing issues in our world!”*

**– Rheta Rubenstein of Ridgefield, WA, *Young Children and Technology: Hopes and Dreams* with Nancy Carlsson-Paige**



## A Call for Ethical Design

Meghan Owenz, PhD, and Richard Freed, PhD, co-led the Mental Health Professional work group’s efforts to urge the American Psychological Association to address what they believe is deeply unethical behavior: psychologists who use their expertise to make games so addictive, kids can’t put them down. **“Our first ethical obligation is to Do No Harm, and for psychologists to use their expertise to manipulate kids into staying on devices is definitely hurtful,”** says Dr. Freed. **“Thanks greatly to the work of Network members, the world is waking up to the powerful hidden forces of persuasive design which is pulling a generation of children onto screens.”** Dr. Owenz agrees: **“The Network helped us really expand the reach of our work – in addition to talking directly to the APA, we were able to reach parents and caregivers and help them understand how this technology works.”**



# Screen-Free Week 2019

From April 29 – May 5, more than 150,000 people around the world rediscovered the joys of life beyond ad-supported screens. We mapped over 1,000 celebrations on [screenfree.org](http://screenfree.org) – here are some of our favorites!



▲ In Canfield, OH, the whole town got in on the screen-free fun! Families enjoyed a chalk drawing contest judged by the mayor and a town-wide pizza and dance party.

▼ Students in Chilton, WI, enjoyed a full week of screen-free fun! On Create and Read night, families crafted together in the library.



▲ At Yorkshire Elementary in York, PA, students, families, and teachers loved the celebration, which included a hike, an ice cream social, and even a visit from an alligator named Wally!



▲ 7-year-old Lillian put on her own concert and covered up her TV with stuffed animals. "Screen-Free Week is a good time to go outside, walk in the park, and pick up trash," says Lillian. "If we take care of the world, the world will take care of us."

▼ In Tehachapi, CA, kids made their own flower bouquets and a 1900s-style meal at the historic Errea House! "I love promoting wonder in children's lives," organizer Elisa Carlson told us.



▲ The City of Lakes Waldorf School became a screen-free sanctuary and students decorated the building with notes on their favorite screen-free activities.

► At Mounds Park Academy, Russ Purdy continued his tradition of dyeing his hair pink once students completed Screen-Free Week!

Save the Date



May 4-10, 2020



What's the best way to guarantee the most fun during your Screen-Free Week celebration? Get everyone in on it! That's exactly what Dr. Alison Bomba and Kelly Beins have done in their community of Frederick, Maryland. For the past two years, Alison and Kelly have brought screen-free festivities to schools, families, local businesses, and even the mayor's office in their town of 65,000!

Alison first discovered Screen-Free Week after going out to dinner one night and noticing how many kids were engrossed in screens. She felt inspired to look for a screen-free challenge, and found Screen-Free Week! Soon, she enlisted her friend Kelly, and the two set out to make it a community celebration.

Kelly and Alison started their outreach just by telling friends and colleagues about Screen-Free Week. That turned into posting flyers around town, calling local businesses, and eventually, taking to the streets! Decked out in Screen-Free Week gear and holding a prop microphone, Alison and Kelly spent an afternoon downtown, talking to neighbors and community members about their own experiences and struggles with screen use, and inviting everyone to participate in Screen-Free Week 2019.

Alison says their hard work truly paid off, and "helped so many people disconnect to reconnect." At restaurants, libraries, and museums across town, Screen-Free Week events gave thousands of kids the experience and joy of going screen-free. Says Alison, "It was such a rewarding experience!"

Kelly agreed. "Our experience co-leading Frederick's first Screen-Free Week was a lot of work and a lot of fun," Kelly said. "Alison and I played to our strengths personally and professionally. We were committed to seeing it through AND enjoying it and I think all of this added to the campaign's success!"

We are so thankful for the thousands of Screen-Free Week organizers like Alison and Kelly who make this international celebration possible! To host a week of your own, visit [screenfree.org](http://screenfree.org).

In New Market, MD, families enjoyed making fairy garden gates at The Original Playhouse Children's Museum.





## Manipulating Kids? There's An App for That

We were upset, but unfortunately not surprised, when two separate studies revealed that the majority of popular kids' apps are rife with coercive ads, inappropriate content, and illegal data sharing. (In one game, a beloved children's character even starts crying if kids don't make an in-app purchase!) Lots of these apps – including almost all the ones illegally sharing data – were certified “family-friendly” by Google, and many claimed to be educational. To protect kids and parents alike, we filed two FTC complaints: one against developers, for manipulating the kids using the apps, and another against Google, for misleading parents about how safe they were.

To model what app stores should do instead, we developed the Kids' App Store Standards: simple rules that ban in-app purchases, unfair advertising, and illegal data collection, and require a human review of each app. **Apple recently released new rules for their children's apps that align very closely with our Kids' App Store Standards!**

And it's not just mobile app makers misleading parents about what's good for young kids: tech companies have been pitching “online pre-school” to lawmakers as a way to get children “ready for kindergarten” on the cheap. This troubling trend means more screen time for kids and less money for what really works: hands-on, face-to-face preschool led by caring, skilled adults.

With our friends at Defending the Early Years, CCFC organized more than 100 experts in technology and early education to demand states fund real universal pre-K, not the online scams. Thousands of people in 15 states have joined our campaign, demanding that their legislators reject online pre-K and fund the real, high-quality early education that all children need and deserve!

\*For more on our work protecting kids from predatory tech, see page 1!

*“Parents shouldn't have to worry about whether their child's 'educational' app is actually filled with inappropriate pop-up ads, but as our research found, a lot of these apps have design features that might interrupt kids' learning. CCFC helped turn our findings into actionable policy and level the playing field for parents and kids.”*


**– Dr. Jenny Radesky, pediatrician and senior researcher,  
Advertising in Young Children's Apps: A Content Analysis**






# A Year of CCFC in the News


CCFC’s advocacy routinely makes headlines around the world, giving us an incredible power to shape the conversation around kids, media, and commercialism. Here are just a few of our press appearances from this year.




**Amazon Alexa: is it friends with your kids?** 7/16/18




**Tech companies use “persuasive design” to get us hooked. Psychologists say it’s unethical.** 8/8/18




**Retailers are marketing directly to kids shopping on their smartphones** 8/10/18




**New Pressure on Google and YouTube Over Children’s Data** 9/20/18




**Google Is Teaching Children How to Act Online. Is It the Best Role Model?** 10/23/18




**Groups Call for Probe of Android Apps Found Marketing to Kids** 10/30/18




**Why Children’s Fondness for YouTube Puts the Company at Risk** 11/7/18




**Google hit with FTC complaint over ‘inappropriate’ kids apps** 12/19/18



**Facebook Data Scandals Stoke Criticism That a Privacy Watchdog Too Rarely Bites** 12/30/18




**Facebook knowingly let kids rack up huge gaming bills on their parents’ credit cards** 1/29/19




**Advocates Ask FTC ‘To Hold Facebook Accountable’ For In-Game Purchases By Kids** 2/21/19



**YouTube’s ‘whack-a-mole approach’ to child safety isn’t working, critics say** 2/21/19




**Online and Making Thousands, at Age 4: Meet the Kidfluencers** 3/1/19




**Toy unboxing videos have taken over YouTube. Some experts say they exploit kids.** 3/22/19




**TED 2019: Prize to online classes project causes controversy** 4/17/19




**World health officials take a hard line on screen time for kids. Will busy parents comply?** 4/24/19



**Amazon Echo Dot Kids Edition under fire from advocacy groups over alleged privacy violations** 5/9/19



**Following FTC complaint, Google rolls out new policies around kids’ apps on Google Play** 5/29/19



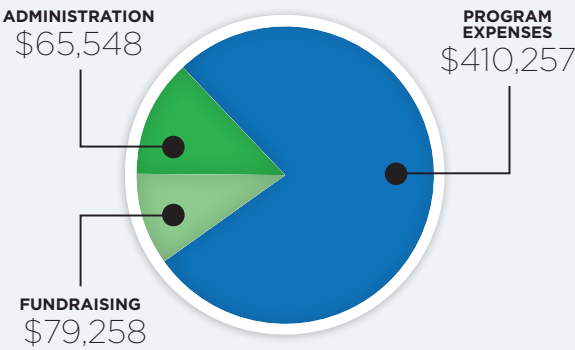
**Sex, drugs, and self-harm: Where 20 years of child online protection law went wrong** 6/13/19

# CCFC Financials

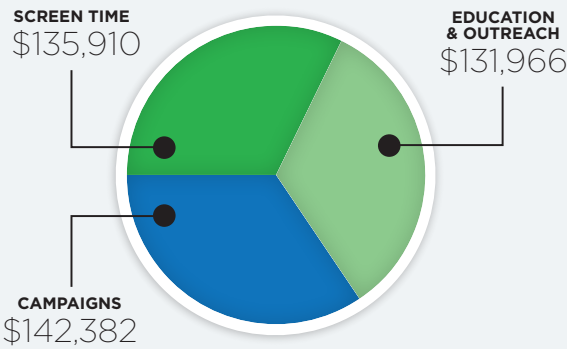
## INCOME

Grants	\$ 61,178
Individual Donations	\$ 365,116
Honoraria and Book Sales	\$ 3,995
Total FY19 Income	\$ 420,289
Expenses	\$ 555,064
Net Increase/(Decrease)	\$ (134,775)
Beginning Reserves	\$ 460,718
Net Assets FY19	\$ 325,943

## TOTAL EXPENSES: \$555,064



## PROGRAM EXPENSES: \$410,257





Our Supporters

We are incredibly grateful for CCFC’s supporters, who are actively building a world where all kids get the commercial-free time and space they deserve. Below are our donors for FY19 (July 2018 – June 2019), without whom our work would not be possible.

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## Our Mission

**CCFC educates the public about commercialism's impact on kids' wellbeing  
and advocates for the end of child-targeted marketing.**



Campaign for a Commercial-Free Childhood

89 South Street, Suite 403, Boston, MA 02111

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