May 21, 2025

Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Potential COPPA Violations in Google's Rollout of AI Chatbot Gemini to Children

To the Federal Trade Commission:

This month, Google made its artificial intelligence chatbot, Gemini, available to children under 13 who have parent-managed accounts through Google's Family Link system. It notified parents of this change via an email that indicates the company will not be requiring verifiable parental consent before engaging in this new form of data collection and use. We have submitted the enclosed letter to Google asking it to halt its rollout of the Gemini chatbot to children under 13 until Google produces further research attesting to its safety, legality, and fitness for children and demonstrates sufficient safeguards. Further, we urge the Federal Trade Commission to investigate whether Google – a company with a long history of FTC enforcement actions – is violating the Children's Online Privacy Protection Act (COPPA) in offering this service to children under 13. AI chatbots pose significant risks to children's privacy and wellbeing, and ensuring Google's compliance with COPPA is urgent.

Google's conduct in opening up its Gemini service to children appears to violate COPPA's notice and consent requirements. In its email to parents using Family Link accounts for their children, Google informed parents that "Gemini Apps will soon be available for your children." The email makes clear that if parents do not want their children to use Gemini, they must opt out: "We'll also let you know when your children access Gemini for the first time. You can manage these settings, including turning access off, from the Family Link app or familylink.google.com." COPPA is clear that opt out mechanisms are insufficient to protect children and their families under the law. Under Sections 312.4 and 312.5 of the COPPA Rule, an operator must take reasonable efforts to provide direct notice and "obtain verifiable parental consent before any collection, use, or disclosure of personal information from children, including consent to *any material change in the collection, use, or disclosure practices to which the parent has previously consented.*"[1] Offering an AI chat service to child users is a clear example of a material change to Google's collection, use, or disclosure practices.

Parents have the right under COPPA to receive notice and provide verifiable consent *before* their children begin using Gemini. AI chatbots and other generative AI products pose heightened risks to young children. Children have difficulty understanding the difference between an AI chatbot

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[1] 16 C.F.R. §§ 312.4(a) & 312.5(a)(1) (emphasis added).

and a human, and AI chatbots can [easily trick a child into trusting it.](#) AI systems, like Gemini, expose young children especially vulnerable to misinformation and manipulation. There are similar, [serious risks](#) to children's mental health and social development, as young users may develop a psychological dependence or rely on AI chatbots for untrustworthy information, parasocial companionship, or emotional support. It follows that children are highly likely to share personal information with Gemini, despite Google's instruction to parents to tell their children "not to enter sensitive or personal info." Google cannot shift responsibility onto parents by offering recommendations and an opt-out mechanism. It is Google's responsibility to ensure its products safety, fitness, and compliance with legal obligations, including COPPA.

Finally, the undersigned note that when the updated COPPA Rule becomes effective next month, Google will be required to comply with additional notice requirements under Section 312.4, including the requirements that operators explain how they intend to use a child's personal information, which third parties will receive the child's personal information, and the purpose for that disclosure.

We urge the FTC to investigate Google's conduct in expanding Gemini to children and to hold the company responsible for COPPA compliance to the fullest extent of the law.

Sincerely,

Organizations:
Electronic Privacy Information Center (EPIC)
Fairplay

Africa Digital Rights Hub LBG
AFT
Alana Institute
Alexander Neville Foundation
Alternative Solutions
ANEW Life International, Inc
Anxiety and Depression Association of America
Becca Schmill Foundation
Better Screen Time
Better Tech Project
Center for Digital Democracy
Center for Humane Technology
Center for Online Safety
Centre for Media, Technology, and Democracy
Check My Ads

Child Online Africa (COA)
Children and Screens: Institute of Digital Media and Child Development
Clinical Social Work Association
Consumer Action
Consumer Federation of California
Corporación Colombiana de Padres y Madres - Red PaPaz
David's Legacy Foundation
Defending the Early years
Depression and Bipolar Support Alliance (DBSA)
Design It For Us
Devin J Norring Foundation
Early Childhood Work Group, Fairplay's Screen Time Action Network
Eating Disorder Coalition of Iowa
Eating Disorders Coalition for Research, Policy, & Action
EDGE Consulting Partners
Educate and Empower Kids
Enough Is Enough
Erik's Cause
Farrington Specialty Centers
Global Action Plan
Grace McComas Memorial
Internet Safety Labs
IPA-Canada
Jewish Family and Children's Services (SF Bay Area)
LiveMore ScreenLess
Lookup.live
Lynn's Warriors
Maternal Mental Health Leadership Alliance
Matthew E. Minor Awareness Foundation
Media Monitoring Africa
Mental Health Association of South Mississippi
National Federation of Families
Parents Television and Media Council
Parents Who Fight
ParentsSOS
ParentsTogether Action
Paving the Way Foundation
Peace Educators Allied for Children Everywhere (PEACE)
Protect Young Eyes
Raising Awareness About Digital Dangers (raadd.)

Realized Potential Inc
REDC Consortium
SAVE-Suicide Awareness Voices of Education
Social Media Victims Law Center
Strategic Training Initiative for the Prevention of Eating Disorders
Tech Transparency Project
The Anxious Generation Campaign
The Multi Service Eating Disorders Association Inc
The Tech Oversight Project
Truce
Turning Life On
U.S. Public Interest Research Group (PIRG)
UltraViolet
United Church of Christ Media Justice Ministry
VSAK
Washington Nature Preschool Association (WaNPA)
WealthManagementMinistries-Prevention Works Joint Task Force and Coalition
Wired Human
WithAll
Yellowstone Human Trafficking Task Force

Individuals:
(affiliations listed for identification purposes only)

John M. Abowd, Edmund Ezra Day Professor Emeritus of Economics, Statistics and Data Science at Cornell University

Gaia Bernstein, Professor of Law (Technology, Privacy, and Policy), Seton Hall University School of Law; author of *Unwired: Gaining Control over Addictive Technologies*

Lorrie Cranor, Director and Bosch Distinguished Professor in Security and Privacy Technologies of CyLab; FORE Systems University Professor of Computer Science and of Engineering and Public Policy at Carnegie Mellon University

Meg Leta Jones, Provost's Distinguished Associate Professor, Georgetown University

Laura Marquez-Garrett, Attorney, Social Media Victims Law Center

Professor Katherine J. Strandburg

Zephyr Teachout, Law Professor, Fordham Law School

Sherry Turkle, Ph.D., Abby Rockefeller Mauzé Professor of the Social Studies of Science and Technology, MIT

Carissa Veliz, Associate Professor in Philosophy at the Institute for Ethics in AI; Fellow at Hertford College at the University of Oxford

May 21, 2025

Mr. Sundar Pichai
Chief Executive Officer Google, Inc.
1600 Amphitheatre Parkway
Mountain View, CA 94043

Re: Suspending Gemini Rollout Due to the AI Chatbot's Unaddressed, Significant Risks to Young Children

Dear Mr. Pichai,

Once again, it appears that Google is exposing children to significant online safety and privacy risks in its race to promote its latest product. This month, Google announced it would roll out a version of its Gemini chatbot for users under 13 years old. Google should reverse that decision. AI chatbots cause a litany of well-documented harms, from stunting social development to endangering online safety and privacy. These harms are particularly acute for young children. Google's announcement flies in the face of privacy and online safety laws including the Children's Online Privacy Protection Act[1] and other state design code statutes. As a coalition of consumer advocates and children's online privacy and safety experts, we write to ask Google to halt its rollout of the Gemini chatbot to children under 13.

AI chatbots and other generative AI products pose heightened risks to young children. Children have difficulty understanding the difference between an AI chatbot and a human, and AI chatbots can easily trick a child into trusting it.[2] AI systems, like Gemini, expose young children especially vulnerable to misinformation and manipulation. There are similar, serious risks to children's mental health and social development,[3] as young users may develop a psychological dependence or rely on AI chatbots for untrustworthy information, parasocial companionship, or emotional support. Finally, although Google claims that children's data would not be used to train its AI, serious data protection and user privacy concerns persist. For example, Google has not identified additional safeguards to ensure that it would not misuse data collected through Gemini for other internal purposes or share it with third parties.

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[1] 16 C.F.R. § 312.4 (Offering Gemini to children likely constitutes a "material change in the collection, use, or disclosure practices to which the parent has consented," under §312.4 of the COPPA Rule, requiring Google to comply with additional notice and consent requirements under the law.).

[2] Young children, beginning around age 3 through elementary school, are incredibly credulous, or highly trusting, especially when it comes to things they hear from others (called "interpersonal trust"). Though Google's Family Guide to AI warns that, "AI can make mistakes; put on your thinking cap!... You should always double-check if what AI tells you is right." This is a developmentally inappropriate demand on young kids with potentially harmful consequences.

[3] When researchers looked at how children 3-10 years old interact with internet-connected toys like AI chat bots, they found that they were likely to treat them like a person. Another study "observed that… young children…attributed human-like qualities to the devices and developed an emotional attachment to them." This emotional attachment can disturb or, in extreme cases, displace essential real-life interactions, and can be detrimental to children's healthy social-emotional development.

Gemini system itself echoes these concerns. [When asked](#) if it posed risks to children's privacy and safety, it identified many of the above-listed harms. However, the Google announcement disclaimed any responsibility to mitigate these harms or implement safeguards around its own product. Instead, Google unfairly shifts all responsibility onto parents, [recommending](#) that parents teach their children how to fact-check Gemini's answers, remind their children that Gemini isn't human, and instruct their children not to disclose sensitive personal information to the AI chatbot. While parental involvement is a key component of children's online safety, the companies creating and financially benefitting from these highly complex systems are the ones who best understand their products and are in the best position to take meaningful action on safety, fitness, and compliance with legal obligations. If Google wants to market its products to children, it is Google's responsibility to ensure that the product is safe and developmentally appropriate for those children, which it has not done.

Given the substantial harm that AI chatbots like Gemini pose to children, and the absence of evidence that these products are safe for children, Google must suspend its rollout of Gemini for young children under 13.

Sincerely,

Organizations:
Electronic Privacy Information Center (EPIC)
Fairplay

Africa Digital Rights Hub LBG
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Alana Institute
Alexander Neville Foundation
Alternative Solutions
ANEW Life International, Inc
Anxiety and Depression Association of America
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LiveMore ScreenLess
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Paving the Way Foundation
Peace Educators Allied for Children Everywhere (PEACE)
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Realized Potential Inc
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The Tech Oversight Project
Truce
Turning Life On
U.S. Public Interest Research Group (PIRG)
UltraViolet
United Church of Christ Media Justice Ministry
VSAK
Washington Nature Preschool Association (WaNPA)

WealthManagementMinistries-Prevention Works Joint Task Force and Coalition
Wired Human
WithAll
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Individuals:
(affiliations listed for identification purposes only)

John M. Abowd, Edmund Ezra Day Professor Emeritus of Economics, Statistics and Data Science at Cornell University

S Bryn Austin, Sc.D., Professor, Boston Children's Hospital and Harvard T.H. Chan School of Public Health; Director, Strategic Training Initiative for the Prevention of Eating Disorders

Criscillia Benford, Ph.D., co-author of "Sensory Metrics of Neuromechanical Trust" and "Buying to Belong: Youth and the Allure of the Metaverse"

Gaia Bernstein, Professor of Law (Technology, Privacy, and Policy), Seton Hall University School of Law; author of *Unwired: Gaining Control over Addictive Technologies*

Mark Bertin, M.D., Assistant Professor of Pediatrics, New York Medical College; author of *The Family ADHD Solution*, *Mindful Parenting for ADHD*, and *How Children Thrive*; contributing author of the textbook *Teaching Mindfulness Skills to Kids and Teens*

Faith Boninger, Ph.D., Research Professor, University of Colorado Boulder School of Education; Co-Director, Commercialism in Education Research Unit; Publications Manager, National Education Policy Center

Kristin Bride, B.S., Health Management & Policy; Social Media Reform Advocate

Hilarie Cash, Ph.D., Certified Sex Addiction Therapist, Washington State Gambling Counselor, L.M.H.C.; author of *Video Games and Your Kids: How Parents Stay in Control* and *Facing Internet Technology and Gaming Addiction*

Kathleen Clarke-Pearson, M.D., Pediatrician, Mediatrician, American Academy of Pediatrics; Advocate for Balanced Screen Time

Mary Cornish, Ph.D., Professor of Early Childhood Education, Plymouth State University; co-author of *Techwise Infant and Toddler Teachers: Making Sense of Screen Media for Children Under 3*

Lorrie Cranor, Director and Bosch Distinguished Professor in Security and Privacy Technologies of CyLab; FORE Systems University Professor of Computer Science and of Engineering and Public Policy at Carnegie Mellon University

Beth Daynes, M.Ed., University of Washington

Gloria DeGaetano, Founder and CEO, Parent Coaching Institute; author of *Parenting Well in a Media Age: Keeping Our Kids Human*

Margot L. Denomme, J.D., Founder and CEO, Raising Awareness About Digital Dangers (RAADD)

Diane Dreher, Ph.D., Professor Emeritus of English, Santa Clara University, author, *The Tao of Personal Leadership*

Jean Fahey, Ph.D., Parent Educator, author of *Make Time for Reading* and *I'll Build You a Bookcase*

Debbie Farr, Ph.D., Human Development and Family Studies Specialist

Robert Flahive, M.S., Credentialed Music Educator

Richard Freed, Ph.D., Psychologist; author of *Better Than Real Life*

Jonathan Haidt, Social Psychologist; author of *The Anxious Generation*

Ian Hansen, Ph.D., Assistant Professor, Department of Behavioral Sciences, York College, CUNY

Melinda Holohan, M.A., CFLE, Faculty Specialist, Family Science & Human Development, Western Michigan University; co-author, Screen-Aware Early Childhood: A Realistic Approach to Helping Young Children Thrive in a Digitally Complex World (in publication, Teachers College Press)

Meg Leta Jones, Provost's Distinguished Associate Professor, Georgetown University

Brett P. Kennedy, Psy.D., Licensed Clinical Psychologist; co-author of "The Digital Media Overuse Scale (dMOS): A Modular and Extendible Questionnaire for Indexing Digital Media Overuse"

Velma LaPoint, Ph.D., Professor of Human Development (Child), Howard University

Diane Levin, Ph.D., Clinical Professor of Human Development, Boston University; author of *So Sexy So Soon, Teaching Young Children in Violent Times*, and *The War Play Dilemma*; co-founder of Defending the Early Years and Teachers Resisting Unhealthy Children's Entertainment (TRUCE)

Susan Linn, Ed.D., Lecturer in Psychiatry, Harvard Medical School; author *Who's Raising the Kids: Big Tech, Big Business, and the Lives of Children*

Robert MacDougall, Ph.D., Professor of Communication and Media Studies, Curry College; author of *Digination: Identity, Organization and Public Life in the Age of Small Digital Devices and Big Digital Domains* and *Drugs & Media: New Perspectives on Communication, Consumption and Consciousness*

Jenifer Joy Madden, Co-founder Global Alliance for Inspiring Non-tech Infant Nurturing and Growth (GAINING); author of *How to Be a Durable Human*

Tracy Markle, M.A., Counseling Psychology; Founder and Director, Digital Media Treatment & Education Center; co-author of "The Digital Media Overuse Scale (dMOS): A Modular and Extendible Questionnaire for Indexing Digital Media Overuse" and "Internet Gaming Disorder in Children and Adolescents"

Ben Mason, M.Ed., Certified Educational Planner

Alex Molnar, Ph.D., Research Professor and Director, National Education Policy Center, University of Colorado Boulder; co-author of "Time for a Pause: Without Effective Public Oversight, AI in Schools Will Do More Harm Than Good"

Dipesh Navsaria, MPH, MSLIS, M.D., Professor of Pediatrics and Human Development & Family Studies, University of Wisconsin–Madison

Meghan Owenz, Ph.D., ABPP, Licensed and Board-Certified Psychologist; Clinical Associate Professor, Florida International University

Rae Pica, author of *What If Everybody Understood Child Development?*

Michelle Ponti, M.D., FRCPC., Paediatrician; Chair, Digital Health Task Force, Canadian Paediatric Society

Adrienne Principe, Founder of Turning Life On; Parent, Child and Adolescent Coach

Delaney Ruston, M.D., Physician and Filmmaker

Jean Rystrom, Retired Health Care Administrator, Kaiser Permanente

Joni Siani, M.Ed., Professor of Media and Communication, Lasell University; Executive Producer of *Your Attention Please*

Professor Katherine J. Strandburg

Zephyr Teachout, Law Professor, Fordham Law School

Sherry Turkle, Ph.D., Abby Rockefeller Mauzé Professor of the Social Studies of Science and Technology, MIT

Carissa Veliz, Associate Professor in Philosophy at the Institute for Ethics in AI; Fellow at Hertford College at the University of Oxford