

To: April Tabor, Secretary
From: Olivia Berry
Date: December 16, 2020
Re: Request for Public Comment on the Federal Trade Commission's Implementation of the Children's Online Privacy Protection Rule: Comments to be Placed on the Public Record

.....

On December 16, 2019, YouTube content creator Mohamed Moshyem met with FTC staff¹ regarding the FTC's request for public comment on the Children's Online Privacy Protection Rule ("COPPA"). Mohamed Moshyem stated that he runs the largest YouTube channel in the Middle East, with 14 million subscribers and billions of views.

The request for public comment at issue was published in the Federal Register on July 25, 2019, in Volume 84 of the Federal Register at page 35,842. The request for public comment sought information about the effectiveness of the COPPA rule and whether it should be retained or modified. Commissioner Wilson has elected to place on the public record summaries of oral communications from outside parties that substantively respond to the request for comment and that are directed to her office.

During the December 16, 2019 meeting, Mohamed Moshyem raised concerns about the application of COPPA to YouTube content creators. In particular, he expressed concern about the financial loss that creators will face when designating their accounts "for kids." Mr. Moshyem noted that there is no revenue for videos "for kids." The process of changing a channel from a designation of "for general audiences" to a designation of "for kids" will remove targeted ads, remove subscriber notifications for new videos, remove video recommendations on main pages (which drive sixty percent of Mr. Moshyem's video views), and remove suggestions on the end screen for the next video. Mr. Moshyem stated that these changes would make videos designated "for kids" unprofitable to create because they remove the ways in which creators earn revenue. Limits on revenues and restrictions on engagement features would likely force Mohamed Moshyem, and similar creators, to either retire their channels or switch to mature content. Mr. Moshyem fears that this new set of incentives will lead to a diminished presence of children's content, and children, on YouTube.

¹ Also in attendance from the FTC were Commissioner Wilson's advisors Nina Frant and Olivia Berry, Commissioner Phillips' advisor Beth Delaney, and Kristin Cohen from the Division of Privacy and Identity Protection.