

May 8, 2025

Texas House of Representatives
P.O. Box 2910
Austin, Texas 78768-2910

RE: Texas Child Advocates Urge You to Pass SB 2420 for Parental Rights and App Store Accountability

Dear Members of the Texas House of Representatives,

We, the undersigned Texas child advocacy organizations, urge you to support SB 2420. This App Store Accountability bill is a critical step toward ensuring transparency, accountability, and parental authority over Texas children's online experience.

TX SB 2420 introduces three basic, common-sense protections that will finally give Texas parents the tools they need:

1. **Parental Approval for App Downloads and Purchases:** App stores are required to obtain verifiable parental/guardian consent before minors can download apps or make in-app purchases, protecting children from privacy risks, financial harm, and unenforceable contracts. This is already being done by App stores for some in-app purchases, so why not make this the standard?
2. **Accurate and Transparent Age Ratings:** App age ratings must reflect actual content and in-app experiences. Our Attorney General is empowered to take legal action against misrepresented app safety disclosures.
3. **Secure Age Verification:** App stores must securely share anonymized age categories with apps, enabling developers to comply with laws like COPPA (Children's Online Privacy Protection Act) and provide in-app experiences consistent with their stated age ratings, enhancing safety and simplifying compliance.

For too long, app stores have operated as digital gatekeepers with little accountability, allowing children to download apps and agree to complex contracts with billion-dollar corporations, without a parent ever knowing. These agreements often give apps sweeping access to kids' personal data – photos, contact lists, exact locations, even microphones, and cameras – without meaningful safeguards or their parents' knowledge. If this were happening in any other industry, it would be unthinkable.

Even the most involved parents can't keep up with the sheer number of apps their kids are using. On average, children have 40 different apps on their phones, each with its own risks, privacy policies, settings, and data collection practices. It's not that parents aren't paying attention – it's that the system isn't built to keep them informed.

Currently, default smartphone settings allow teens to download apps without notifying their parents and unless parents have jumped through dozens of steps, the same is true for children under age 13. App Stores treat 13-year-olds as adults, allowing them to opt out of parental supervision. Children can download a video chatting app that lets them talk to strangers, a disappearing-messages app, or a hookup app, use it for one night, then delete it before morning. Many apps are rated for 4- and 9-year-olds but allow access to hardcore pornography, conversations with complete strangers, and the sharing of your exact location.

Even when parents can navigate the complex maze of twenty steps to engage parental controls, they're often provided with deceptive safety disclosures. The age ratings in app stores are misleading, inconsistent, and lack accountability. A Wall Street Journal investigation exposed how Apple regularly labels apps with violent, sexual, or exploitative content as safe for young users. A Canadian Center for Child Protection report found that both Apple and Google's rating systems fail to accurately reflect the risks of the apps they promote. Parents assume these ratings are accurate, but the ratings can't be trusted. Apple's own newly set standards for age ratings deem pornography, realistic violence, and drug use as appropriate for 13-year-olds.

This bill does not violate the First Amendment, as SB 2420 does not regulate speech or content, it regulates contracts with minors.

For too long, parents have been expected to do the impossible—monitor every app, every update, every risk—while app stores profit off their kids. TX SB 2420 sets up commonsense guardrails while ensuring that parents and guardians have the final say.

We strongly urge you to support this bill. Families deserve better tools, clearer information, and robust protection. This is a chance to finally hold app stores accountable and put the safety of TX kids first.

Respectfully submitted by the following 17 Texas Child Safety Advocates:

1. Texas Pastor Council
2. Texas Public Policy Foundation
3. Not on Our Watch Texas
4. Texas Youth Foundation
5. Traffick911
6. Freedom Church Alliance
7. David's Legacy Foundation
8. Children at Risk
9. Chains Interrupted
10. Educate and Empower Kids
11. The Jensen Project Advocacy
12. Skull Games
13. Allies Against Slavery
14. Rhonda Graff, NCOSE Board Member
15. Talk More. Tech Less.
16. GoSendMe Global
17. Eagle Venture Fund