



# A TikTok-ing Time Bomb



*Because Our Children  
Are Watching*

November 2022

# A TikTok-ing Time Bomb

## Executive Summary

In the autumn of 2021, the Parents Television and Media Council (PTC) was contacted by the Children's Screen Time Action Network (CSTAN) regarding their concern for streaming television program content that encouraged children and teens to engage in dangerous conduct.

During our first meeting with CSTAN leadership and members, we were introduced to moms whose children had lost their lives after mimicking activities they had viewed in their streaming entertainment programming. We were moved to learn more about the program content linked to the children's deaths. Along the way we observed overt marketing efforts by the producers and distributors of streaming media content to reach children via social media. The closer we looked, the more we uncovered the marketing of dangerous, explicit, adult-themed entertainment on social media platforms that are increasingly used by children.

This report is an attempt to look at the ways media companies use social media – in particular the platforms most popular with teens – to market their mature-rated content to young audiences.

Researchers created accounts on Instagram and TikTok for a 13-year-old user, and found:

- HBO appears to be heavily invested in using TikTok and Instagram as a marketing platform for its original series. Unlike other titles the PTC looked at for this analysis, the “#euphoria” hashtag alone took users to a landing page that seems to carry the network’s branding. On Instagram, the “Euphoria” official page has 7.8 million followers, while 60+ users have their own “Euphoria” fan pages; and the “Euphoria” tag was used on over 3.7 million posts. On TikTok, the hashtag “euphoria” had amassed nearly 50 billion views as of August 2022.
- *Big Mouth*’s Official TikTok account has 36.5k followers and the hashtag “#bigmouthnetflix” has 241.5 million views, an additional 44 hashtags tied to the program add up to millions of additional views.
- With 676.5 million views on TikTok for the hashtag, “sexeducationnetflix,” there is no doubt that the teens on TikTok are familiar with this Netflix MA-rated series. The official Instagram account also number 4 million followers.
- Hulu’s provocatively named, teen-targeted series, “pen15,” appears to have a larger following on TikTok than on Instagram, where the official page claims only 106k followers. But a search for “#pen15hulu” yields 65.9 million views.
- Netflix’s *Squid Game*’s global success in the fall of 2021 can be largely, if not entirely attributed to social media and word-of-mouth. As of this writing, the hashtag #SquidGame had garnered 76.8 billion views on TikTok. By late October 2021, worldwide, *Squid Game* had received more than 12 million mentions across social media platforms and a reach of more than 36 trillion. The viral marketing of *Squid Game* even trickled down to younger audiences through Roblox, Minecraft, and YouTube – sparking interest in the series among viewers too young to handle the intensely violent content.

Hollywood is doing an end-run around parents by marketing sexually explicit TV-MA-rated content directly to children and teens on social media sites popular with 13-17-year-olds. Programs like *Euphoria*, *Big Mouth*, *Sex Education*, *PEN15*, and other mature-rated titles that feature youth characters are filled with dark, depraved, and sexually exploitive content. The TV-MA rating should, in theory, serve as a gatekeeper for children seeking to learn more about the program. But social media gives children great access into these shows, whether their families subscribe to a particular streaming platform. And Hollywood is using that back door to do just that.

Given these findings, the PTC is first reminding parents to be vigilant in supervising and monitoring their children's online activity. Secondly, the PTC is calling on Hollywood and Big Tech to cease the intentional marketing of explicit, adult entertainment to children via social media. A symbiotic relationship exists whereby the social media platforms generate advertising revenue, while Hollywood connects directly with kids who see, hear and engage with promotional material for potentially harmful program content. Producers and distributors of explicit material need to stop using these platforms to reach underage audiences. It is duplicitous for the entertainment industry to pat themselves on the back and act like they are behaving responsibly by rating their nearly pornographic content for mature-audiences only, while simultaneously marketing those same programs to 13- and 14-year-old children.

Thirdly, the PTC is calling on the Federal Trade Commission to reopen its investigations into the marketing of adult-rated content to children, focusing on the entertainment industry's use of social media platforms as a marketing tool.

Finally, the PTC is calling on Congress to pass the Kids Online Safety Act (KOSA), and to update and pass the Child Safe Viewing Act. When the Original Child Safe Viewing Act was passed in 2007, neither TikTok nor Instagram even existed. Congress must reauthorize this Act and the FCC must conduct a thorough review to employ 21st century technological solutions to help parents protect their children from the proven harm that comes from their exposure to explicit, age-inappropriate material.

## Introduction

In the autumn of 2021, the Parents Television and Media Council (PTC) was contacted by the Children's Screen Time Action Network (CSTAN) regarding their concern for streaming television program content that encouraged children and teens to engage in dangerous conduct.

During our first meeting with CSTAN leadership and members, we were introduced to moms whose children had lost their lives after mimicking activities they had viewed in their streaming entertainment programming. We were moved to learn more about the program content linked to the children's deaths. Along the way we observed overt marketing efforts by the producers and distributors of streaming media content to reach children via social media. The closer we looked, the more we uncovered the marketing of dangerous, explicit, adult-themed entertainment on social media platforms that are increasingly used by children.

Our engagement with CSTAN was the genesis for this present research report, conceived out of a growing recognition that dangerous and anti-social behavior in movies and television shows with limited audiences were reaching much larger and younger audiences by being shared widely on social media.

## COVID Fuels Screen Time Surge

During the COVID pandemic, [kids' screen-time more than doubled](#) from a pre-pandemic average of 3.8 hours per day to 7.7 hours per day, not counting time spent online for virtual classes. Meaning that at the height of the pandemic, many children were spending virtually all their waking hours on screens. And even while most activities have returned to normal, kids' screen time has not returned to pre-pandemic levels.

Not surprisingly, then, social media use also spiked during the pandemic.

According to a [2022 Pew Research Center survey](#) of American teenagers ages 13-17, 97% say they use the internet daily; and nearly half say they use the internet "almost constantly." TikTok is now a top social media platform for teens, with some 67% of teens reporting that they use TikTok at least occasionally and 16% of all teens saying they use it "almost constantly."

## Programmed for Addiction

There's a reason nearly a quarter of teens are on social media "almost constantly."

Social Media algorithms are designed to keep people locked on the site or platform by tracking what kind of content the user engages with, and feeding the user more of that content. Even if it is more dangerous or extreme than what the user first searched for.

A [former Facebook employee-turned whistleblower testified to Congress](#) that a search for healthy recipes could lead a user to content promoting anorexia. Likewise, a [Wall Street Journal investigation](#) revealed that TikTok's algorithms fed content featuring drugs, pornography, and other adult content to accounts owned by 13-year-olds.

These algorithms make social media addictive – and dangerous – especially for young people.

One expert said social media companies “build features into their apps that manipulate our brain chemistry. These tricks are borrowed straight from casinos and slot machines, which are widely considered to be some of the most addictive machines ever invented.”

Dopamine trains your brain to associate pleasure with whatever action you just took that made you feel good, whether it’s seeing new followers or “likes” on a social post, hitting a jackpot on a slot machine, or consuming a chemical substance. When those dopamine levels are elevated for long periods of time, the brain needs more and more of that stimulus to elicit the same response.

Taking away those dopamine-triggering responses can cause the teen to [experience anxiety, fear of missing out](#) (FOMO), and feelings of inadequacy.

[“Research suggests](#) that compulsive use of social media may trigger social media fatigue in adolescents. Fear of missing out may indirectly account for this fatigue, and sometimes could result in increased anxiety and depression symptoms... According to [recent] studies, longer use of social media platforms may also be associated with increased symptoms of social anxiety.”

### Social Influence Marketing

Companies, including entertainment companies, exploit teens’ fear of missing out and social anxiety to increase engagement around their product through Social Media Influence Marketing.

Social Influence Marketing is the use of social media platforms to influence the perception, opinions and buying decisions of consumers by creating vocal evangelists, or super peers, and encouraging positive comments about a brand, product or service.

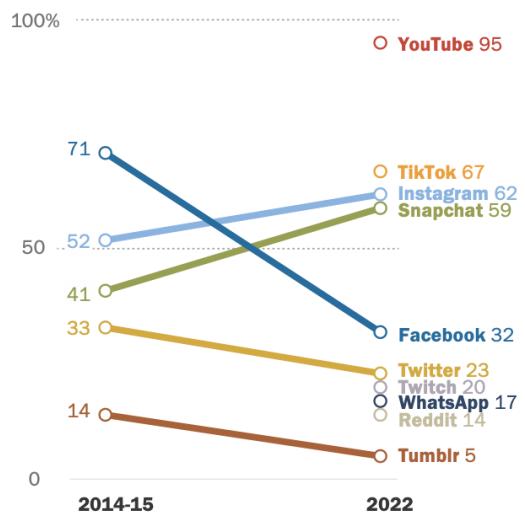
Super peers are individuals who influence the opinions, behavior and buying patterns of those in their social networks, both online and off.

From its earliest days, marketers have viewed Social Media as an inexpensive way to build “buzz” around people, products and events. Though marketers may still use traditional paid advertising techniques like TV and radio ads, billboards and print ads, or even buying ads on social media sites; increasingly Hollywood is recognizing the power of getting ordinary folks to do their marketing for them through super peers, word-of-mouth or “viral” campaigns, [memes, stealth marketing](#), and by employing hashtags that drive attention and content to their brand or product.

Recently TikTok and Giphy announced a partnership that allows TikTok users to incorporate Giphy sound clips into their videos. The Giphy integration will feature clips from HBO, ABC, Hulu, Xbox and Roku. According to *Advertising Age*, this represents “a potential boon for marketers and creators.”

### Since 2014-15, TikTok has arisen; Facebook usage has dropped; Instagram, Snapchat have grown

% of U.S. teens who say they ever use any of the following apps or sites



Note: Teens refer to those ages 13 to 17. Those who did not give an answer are not shown. The 2014-15 survey did not ask about YouTube, WhatsApp, Twitch and Reddit. TikTok debuted globally in 2018.

Source: Survey conducted April 14-May 4, 2022.

“Teens, Social Media and Technology 2022”

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"Since the first clips come from entertainment partners, it could give TV shows and movies an entry point into TikTok. 'Just as TikTok completely upended the music industry—trends and viral bops catapulting unknown artists to stardom—it may be film and TV's turn,' said Tom Hyde, VP of strategy at Movers+Shakers."

TV and Film studios are already on TikTok – this new integration just means there will be more avenues to make their content go "viral."

### Marketing Adult Entertainment to Kids

Though the media landscape has changed dramatically over the last two decades, Hollywood's efforts to fly under the radar in their marketing to minors has not.

In the aftermath of the 1999 school shootings at Columbine High School in Littleton, Colorado, when it was revealed that the school shooters displayed interest in violent, R-rated movies and M-rated, first person-shooter video games, the United States Congress held hearings to investigate the marketing of adult (specifically, violent) entertainment to children.

During those hearings, and in a subsequent investigation by the Federal Trade Commission, it was revealed that many entertainment companies were deliberately targeting children in the marketing of adult-rated content.

A September 2000 report by the Federal Trade Commission (FTC) revealed that movie studios, video game publishers, and music labels were going out of their way to interest under-aged children in their adult-rated products.

The Commission's report showed, for example, that movie studios repeatedly advertised R-rated films on television programs that were rated highest among teens or where teens comprised the largest share of the audience. In addition, internal memos discovered by the Commission referred to the target market for one video game as "males 17 - 34 due to M rating" and then in parentheses stated: "(the true target is males 12 - 34)."

In some ways, much has changed in the 22 years that have passed. In other ways, it is now very much as it was then.

The media most consumed by children and adolescents has certainly changed. Primetime broadcast television is no longer the dominant media in the lives of children. **But Hollywood's efforts to do an end-run around parents by marketing their mature-rated programs on platforms that are most heavily used by teens, TikTok and Instagram in particular, has not changed.**

### Methodology

This report is an attempt to look at the ways media companies use social media – in particular the platforms most popular with teens – to market their mature-rated content (especially content that features teenaged characters) to young audiences.

Analysts created new accounts on Instagram and TikTok. No age verification was requested or required to sign-up for Instagram.

On TikTok, which has recently added some additional parental controls and safeguards for children, a date of birth was requested. The researcher created an account as a 13-year-old.

It is worth noting here that TikTok has added a “Family Pairing” feature. Parents have to have an account, and the child or teen has to scan the QR code from the parents account to gain access. The researcher was able to bypass this feature and create a new account as a 13-year-old without being linked to an adult account.

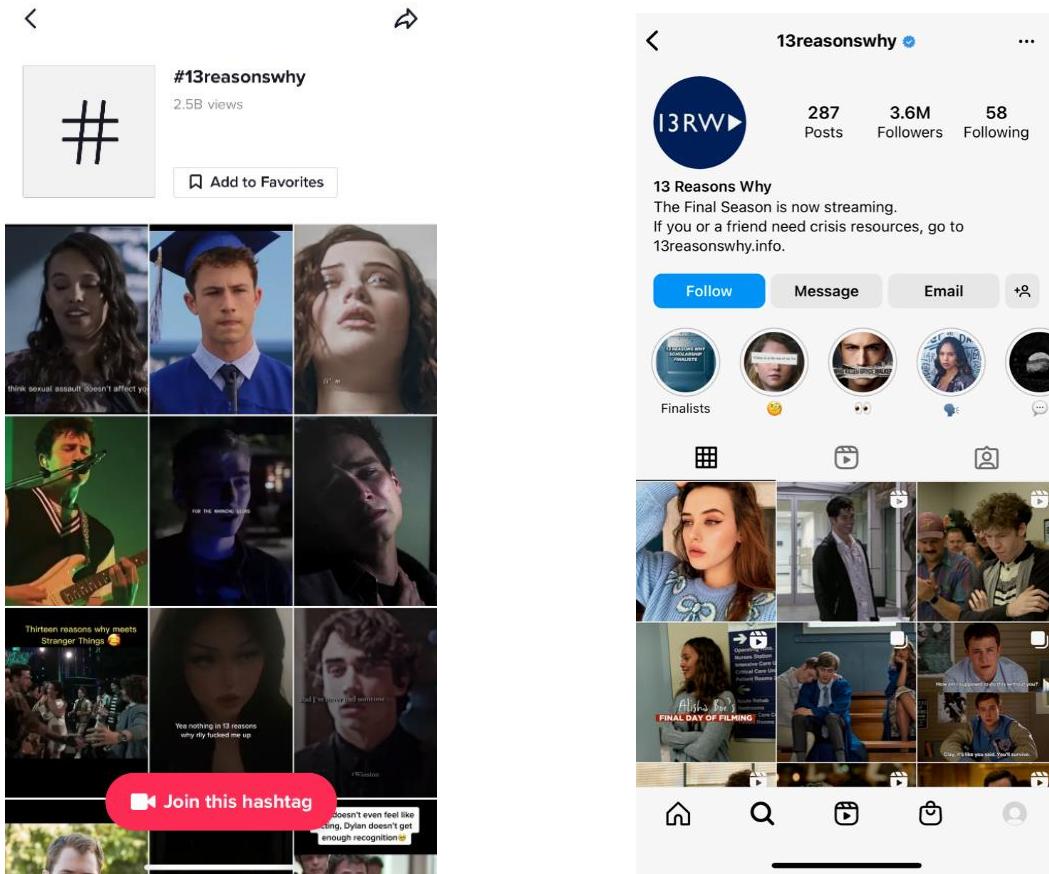
Analysts then searched for hashtags and accounts associated with MA-rated shows that heavily feature adult content, and especially such content featuring child-aged characters engaging in violent or sexually explicit scenes. Specifically, *13 Reasons Why*, *A Teacher*, *Big Mouth*, *Euphoria*, *Panic*, *pen15*, and *Sex Education*. Because of its extensive popularity among teens, *Squid Game* was included in this analysis.

Some titles led specifically to program-related content (*Euphoria*, *13 Reasons*), other titles appeared to be primarily tied to content not related to the program. In those instances, the title and streaming platform were used in the search (E.g. “*Big Mouth Netflix*,” as opposed to just “*Big Mouth*” which pulled up posts related to the Snapchat filter and posts related to a K-drama).

## Findings

Being logged-in as a 13-year-old did not seem to affect ability to access content related to MA-rated programming on TikTok.

### *13 Reasons Why* on Netflix

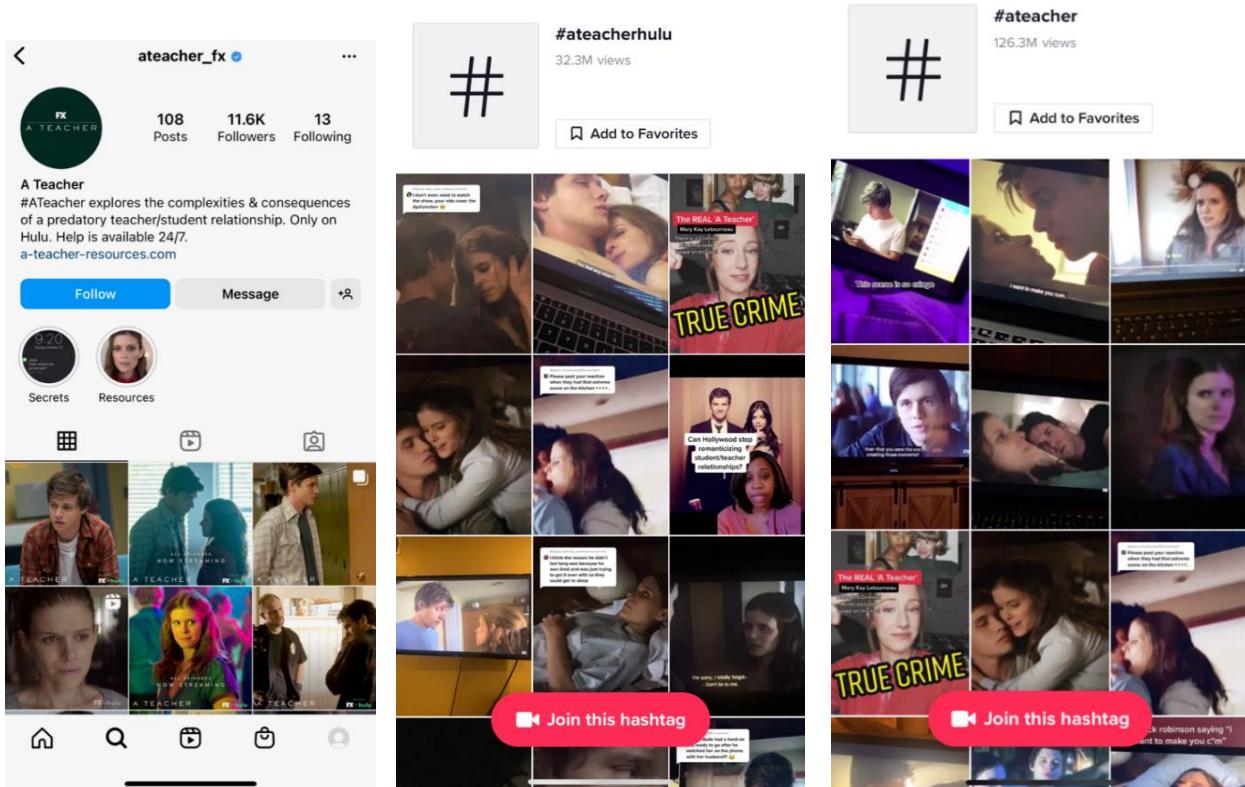


The final season of Netflix's *13 Reasons Why* dropped on June 5, 2020 – slightly before TikTok really took-off in America (TikTok surpassed 2 billion downloads in October of that year). Nevertheless, content related to *13 Reasons* has generated over 2.5 billion views on TikTok, and inspired 80 unique hashtags, with millions of additional views collectively. At least 290 fan accounts tied to the name "13 Reasons" can be found on TikTok.

On Instagram, the program's "official" page has 3.6 million followers, and 1.7 million posts are tagged with "13reasonswhy."

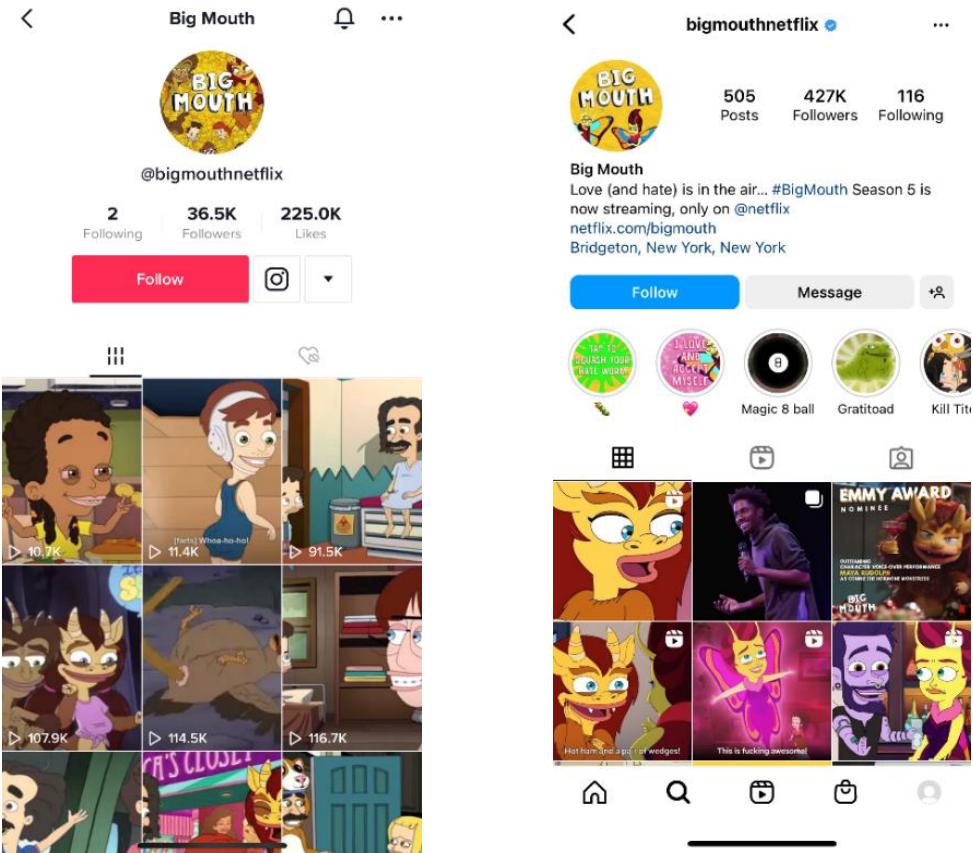
Instagram users have also employed an additional 63 unique hashtags related to "13 Reasons" and at least 60+ fan accounts are tied to the program.

### A Teacher on Hulu



Though not one of the more popular series on social media, the tag "#ateacherhulu" still generated 32.3 million views, while "#ateacher" has 126.3 million. Although not all posts carrying the tag "#ateacher" are directly related to the Hulu series, many clearly are (as the attached photo shows).

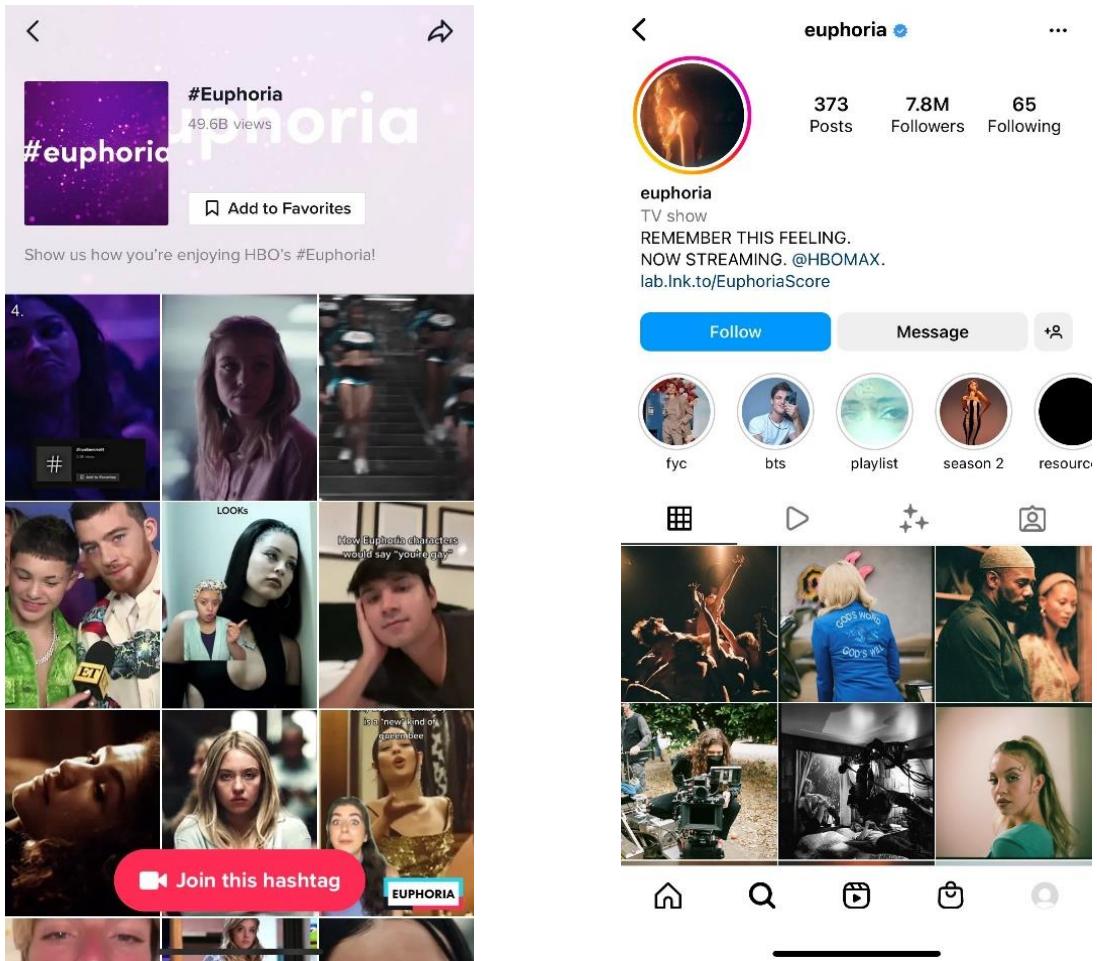
## *Big Mouth* on Netflix



Big Mouth's Official TikTok account has fewer followers (36.5k) than the account owned by Big Mouth creator, Nick Kroll (1.6m); nevertheless, the hashtag "#bigmouthnetflix" has 241.5 million views, an additional 44 hashtags tied to the program add up to millions of additional views.

Even though the analyst was logged-on as a 13-year-old, the "#bigmouthnetflix" led to troubling material, including a video of a young girl hugging people in "Hormone Monster" costumes and being given a penis-shaped lollipop with a "Big Mouth" sticker on it, and user uploaded content from the show featuring an adolescent character asking his girlfriend, "Are you saying I'm bad at fingering?"

## Euphoria on HBO



HBO appears to be heavily invested in using TikTok and Instagram as a marketing platform for its original series. Unlike other titles the PTC looked at for this analysis, the “#euphoria” hashtag alone took users to a landing page that seems to carry the network’s branding.

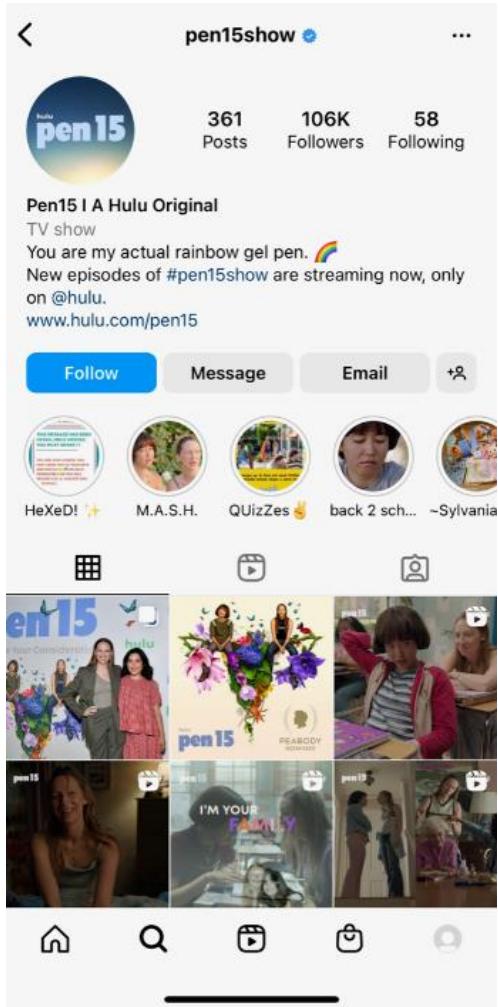
On TikTok, the hashtag “euphoria” had amassed nearly 50 billion views as of August 2022. And there were 130 additional unique hashtags tied to “euphoria,” most of which had millions of views. In addition, there were nearly 150 user and fan accounts linked to the “Euphoria” search, each with their own followers – so that the program “Euphoria” got tens of billions of impressions on TikTok alone; and the fact that these searches were conducted on an account ostensibly belonging to a minor does not seem to have impacted the user’s ability to access content from this MA-rated series.

On Instagram, the “Euphoria” official page has 7.8 million followers, while 60+ users have their own “Euphoria” fan pages; and the “Euphoria” tag was used on over 3.7 million posts.

By contrast, although there is a lot of fan-generated content related to the Game of Thrones prequel, “House of Dragons” on both Instagram and TikTok, there is no “blue-check”/verified official “House of Dragons” account, suggesting that a presence on youth-oriented social media was a deliberate marketing strategy for “Euphoria” but not for “House of Dragons.”

## Panic on Amazon Prime Video

This series about teenagers who engage in life-threatening dares for a chance to escape their small town carries a risk of copy-cat behavior, especially when it is marketed on a platform that is being sued for wrongful death after two girls died allegedly trying to participate in one TikTok fad: The choking game. The tag “#panicamazon” has 7.5 million views and the tag “#paniconprime” has an additional 1.4 million views.

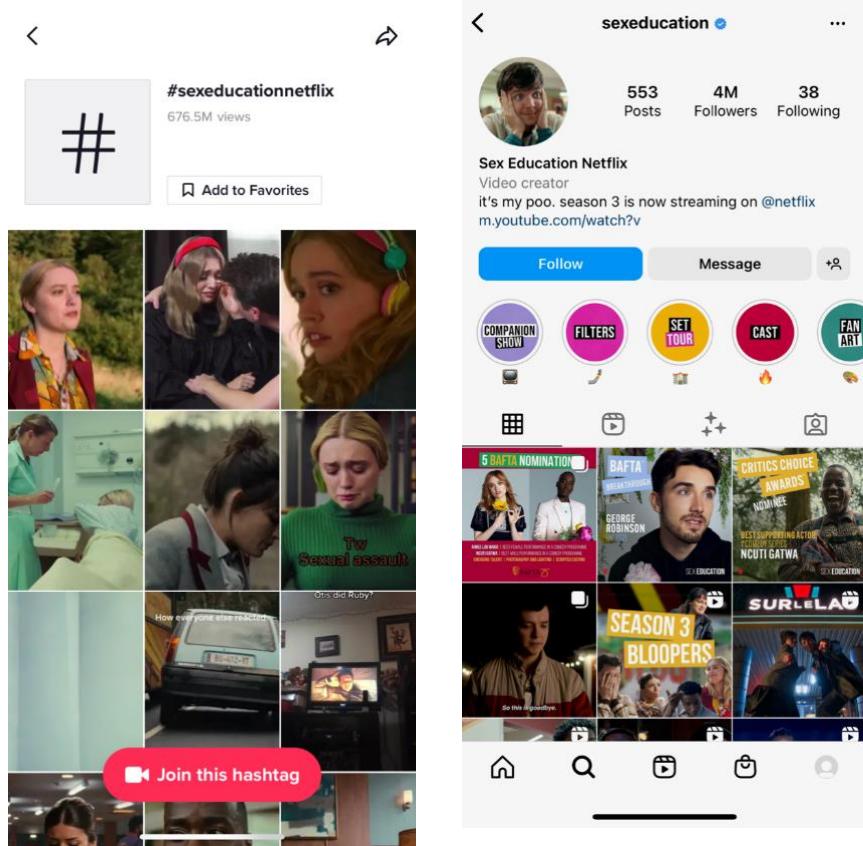


## pen15 on Hulu

Hulu's provocatively-named, teen-targeted series, "pen15," appears to have a larger following on TikTok than on Instagram, where the official page claims only 106k followers. But a search for "#pen15hulu" on yields 65.9 million views. Looking at the user accounts tied to the series, things take a more disturbing turn, where the ostensibly 13-year-old user will see provocative avatars and user names such as "banana\_eater69," "crunchycumcookies," and "xxx\_pussyxslayer\_xxx"

With 676.5 million views on TikTok for the hashtag, “*sexeducationnetflix*,” there is no doubt that the teens on TikTok are familiar with this MA-rated series. The official Instagram account also numbers 4 million followers. Like the Hulu series “*pen15*” discussed above, user accounts tied to this series also feature provocative avatars and suggestive user names – all clearly visible to any minor-aged TikTok users.

### *Sex Education* on Netflix



### *Squid Game* on Netflix

This highly-viewed Netflix series revolves around a contest where hundreds of financially destitute individuals risk their lives to play a series of deadly children's games for the chance to win a multi-million dollar prize. *Squid Game*'s global success in the fall of 2021 can be largely, if not entirely attributed to social media and word-of-mouth.

As of this writing, the hashtag #*SquidGame* had garnered 76.8 billion views on TikTok. By late October 2021, worldwide, *Squid Game* had received more than 12 million mentions across social media platforms and a reach of more than 36 trillion. The viral marketing of *Squid Game* even trickled down to younger audiences through Roblox, Minecraft, and YouTube – sparking interest in the series among viewers too young to handle the intensely violent content.

Educators in Belgium, England and Australia even had to issue warnings to parents about the program after reports of children copying games and violence from the show.

Thematically similar, *Alice in Borderland* also inspired 107 unique but related hashtags on TikTok, the most popular, “#*aliceinborderland*” racked up more than 1.4 billion views.

### TikTok

Show Name	Search Term(s)	Hashtags	Views	Users	Followers
Euphoria	Euphoria	129 #1 "#Euphoria"= 49.6B views		148 User HBO =1.1M followers	
13 Reasons Why	13reasonswhy	80 #1 "13reasonswhy" = 2.5B views		291 User "13reasonswhyrealtapes" = 127.3K followers	
Big Mouth	bigmouthnetflix	44 #1 "#bigmouthnetflix"=241.5M views		131 User Netflix =27.2M followers, User "nickkroll"=1.6M	
A Teacher	ateacherhulu/ateacherfx	<10 #1 "#ateacherhulu"=32.3M views/ "#teacher" 126.3M views		1 User "ateacherfxonhulu"=130 followers	
Sex Education	sexeducation/sex education netflix	52 #1 "sexeducationnetflix"= 676.5M views		218 User Netflix =27.2M followers	
pen15	pen15	92 #1 "pen15hulu"=65.9M views		1 User "pen_15show"=6420 followers	
Squid Game	squid game	75 #1 "SquidGame"=76.6B views		290 User "leonel22sanchez15"=433.1K followers	
Cuties	cuties netflix	55 #1 "cutiesnetflix"=679.7K views		145 User Netflix =27.2M followers	
Panic	panic amazon/paniconprime	<15 #1 "panicamazon" =7.5M views/"paniconprime" 1.4M views		2 User primevideo =12.9M followers	
Alice in Borderland	aliceinborderland	107 #1 "aliceinborderland" = 1.4B views		256 User "cherry_aib" = 52.9K followers	
Jackass	jackassforever	52 #1 "jackassforever" = 286.7M views		134 User ".jackassforever" = 1253 followers	
House of Dragons	houseofdragons	113 #1 "houseofdragons" = 42.0M views		214 User "dragonshouse" = 24.3 K followers	

### Instagram

Show Name	Search Term(s)	Hashtags	Posts	Users	Followers
Euphoria	Euphoria	65 #1 "#euphoria"=3.7m posts		60 #1 "Euphoria" official page =7.8 M followers	
13 Reasons Why	13reasonswhy	63 #1 "#13reasonswhy"=1.7m posts		60 #1 "13reasonswhy" official page =3.6M followers	
Big Mouth	bigmouthnetflix	14 #1 "#bigmouthnetflix"=14.4k posts		15 #1 "bigmouthnetflix" official page =437K followers	
A Teacher	ateacherhulu/ateacherfx	3 #1 "#ateacherfx"=50 posts		2 #1 "ateacher_fx" official page=11.6k followers	
Sex Education	sexeducation/sex education netflix	1 #1 "sexeducationnetflix"=158k posts		60/42 #1 "sexeducation" official page=4m followers	
pen15	pen15	55 #1 "#pen15show"=4.9k posts		60 #1 "pen15show" official page=106K followers	
Squid Game	squid game	60 #1 "#squidgame"=1.9m posts		60 #1 "squidgamenetflix" official page=188K followers	
Cuties	cuties netflix	7 #1 "cutiesnetflix" =821 posts		19 "cuties.netflix" =120 followers	
Panic	panic amazon/paniconprime	10 #1 "paniconprime" =902 posts		1 "paniconprime" official page=24.8K followers	
Alice in Borderland	aliceinborderland	4 #1 "aliceinborderland" = 78.8K posts		60 #1 "aliceinborderlandnetflix"=46.9K followers	
Jackass	jackassforever	60 #1 "jackass" = 386K posts		60 #1 "jackass" (branded/blue check) = 871K followers	
House of Dragons	houseofdragons	58 #1 "houseofdragons"=12.9K posts		49 #1 "houseofdragons"=373K followers	

## Concerning Consequences

Media companies defend their production and distribution of adult-themed entertainment by pointing to their age-based content ratings, ostensibly shielding themselves from condemnation by insisting parents are responsible if children consume explicit programming. Yet it is unmistakably clear from the findings of this report that those very same media companies are actively and intentionally usurping parental authority by marketing their age-inappropriate mature-rated content directly to children – especially to preteens and teens – on the social media platforms most used by children.

A [survey of teens](#) conducted by Dr. Delaney Ruston, creator of the “Screenagers” documentary film, asked teens, “How often do you see clips, memes, ads, references, or promotional materials for *Euphoria* in your social media feeds?”

80% of respondents reported seeing some type of content related to the show “pretty often” to “very often.” One 17-year-old wrote, “The Insta explore page is flooded with Euphoria stuff.” A 14-year-old responded, “Every 20 videos on TikTok.”

When asked why they watched the show, given the dark themes and content, a 13-year-old responded, “Because it’s trending and no one wants to miss-out.”

We know that children are being harmed by social media and other digital entertainment platforms, and the consequences are proving to be tragic. A dramatic increase in childhood depression, suicide and self-harm appears exactly to mirror the childhood increase in social media screen time.

Suicide is now the [second leading cause of death](#) for children aged 10-14. It is important to remember that the [National Institutes for Health concluded](#) that *13 Reasons Why* was associated with a 28.9% increase in suicide rates among U.S. youth ages 10-17 in the month (April 2017) following the show’s release, after accounting for ongoing trends in suicide rates.

A recent [research report](#) found that nearly 1 in 7 children aged 9-12 shared their own nude photos last year, [almost triple the number from just one year earlier](#).

The report also found a sharp increase in the number of children – again aged 9-12 – who admitted that they’d seen non-consensually re-shared nudes of others, and they were more likely to think sharing nudes is normal among kids their age. Perhaps this is so because of media messages telling them this is normal – messages from programs like “Big Mouth,” “Euphoria,” “Sex Education,” “A Teacher,” and other mature-rated titles focused on teenaged characters.

## Increased Regulatory Scrutiny

Social Media sites like Instagram and TikTok have come under intense public scrutiny in recent years for myriad reasons.

Instagram, according to parent company Meta’s own internal research, has been found to “make body image issues worse for 1 in 3 teen girls” and, “Teens blame Instagram for increases in the rate of anxiety and depression.” According to Meta’s own internal research, 6% of American users and 13% of British users traced the desire to kill themselves to Instagram.



Brendan Carr   
@BrendanCarrFCC

TikTok learned the age, location, interests of a 10 year old girl.

Served her a “Blackout Challenge” video, which encourages users to strangle themselves.

She did that with a purse strap & dies.

Court accepts all this as true & rules that § 230 shields TikTok from liability. [twitter.com/gabrielmalor/s...](https://twitter.com/gabrielmalor/status/144111111111111111)

right of action which accrued to the deceased at common law because of the tort.”” (cleaned up).

IV. CONCLUSION

Nylah Anderson’s death was caused by her attempt to take up the “Blackout Challenge.”

Defendants did not create the Challenge; rather, they made it readily available on their site.

Defendants’ algorithm was a way to bring the Challenge to the attention of those likely to be most interested in it. In thus promoting the work of others, Defendants published that work—exactly the activity Section 230 shields from liability. The wisdom of conferring such immunity is something properly taken up with Congress, not the courts.

I will thus grant Defendants’ Motion on immunity grounds. In light of my decision, I need not address Defendants’ contentions respecting jurisdiction and failure to state a claim.

An appropriate Order follows.

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Dangerous online “challenges” made popular on social media are claiming lives of naïve, vulnerable children.

TikTok is being sued for wrongful death after two girls died allegedly trying to participate in one TikTok fad: The choking game. The lawsuit alleges that the girls, ages 8 and 9, were fed videos of the challenge by the app’s algorithm.

In response to these and other complaints, Congress is considering about a dozen bills focused on “Big Tech,” some of which could force Meta to change how it handles algorithmic recommendations. Meanwhile, a bipartisan group of 10 state Attorneys General launched an investigation late last year into Meta, focused on the potential harms of its Instagram platform on young users.

In an attempt to stave-off public scrutiny and government regulation, TikTok and Instagram have both instituted changes on their platforms. TikTok, for example, has added a “Digital Wellbeing” section to its app, which allows users to set daily time limits, receive reminders to take screen time breaks and weekly screen time updates.

TikTok has also added a host of “Safety and Privacy” controls, and boasts a long list of “partners” who assist with media literacy, fact checking, body inclusivity, and family safety. They list a “Content Advisory Council” to advise on issues relating to “child safety, hate speech, misinformation, and bullying.” TikTok has also apparently taken steps to remove content relating to dangerous online challenges and they employ content moderators to screen-out the worst of the user-generated, uploaded content.

Instagram, for its part, has done away with the “like” counts on posts to reduce the pressure from comparison by teens, and in an effort to combat online abuse, they’ve added a feature to restrict messages during periods of increased activity.

Recently, the state of California passed the “California Age-Appropriate Design Code Act” ([AB-2273](#)), which would require online services used by children to be designed in ways that are age appropriate. Other states are considering similar legislative measures. And earlier this year, the California Assembly introduced the “Social Media Platform Duty to Children Act,” which would have held social media companies financially liable for harms stemming from addiction to their platforms. That measure, which had secured overwhelming bipartisan support in Sacramento, was singlehandedly killed by one State Senator, Anthony Portantino, via the use of an arcane parliamentary procedure. And he did so literally days after being treated at a luxurious Napa Valley resort and spa paid for by bit tech companies.

All of these regulatory efforts seem to be directed at making social media safer for teens and to put parents’ minds at ease so they will allow their teens to use these social sites; and most of these changes

are constructive, as far as they go – but they all seem to be focused on user-generated content. None of these measures would hamper Hollywood’s marketing of adult-rated content to children.

Hollywood gets a free pass. At least it has thus far. But that must change.

## Conclusion and Recommendations

The problems are real, the consequences are dire, and meaningful remedies are urgently needed. Along with our findings in this report, we voice the following three calls to action:

First, to parents.

Parents need to be aware that this is going on, and they must take a more active role in the media consumption habits of their children. But parents have a hard enough job trying to protect their children from toxic influences in the culture without the entertainment industry actively working to undermine them and do an end-run around parents by using social media platforms to market content to children that those children are too young, too immature, and too inexperienced to consume without risk of harm.

Second, to Hollywood and Big Tech.

Cease the intentional marketing of explicit content to children via social media. A symbiotic relationship exists whereby the social media platforms generate advertising revenue, while Hollywood connects directly with kids who see, hear and engage with promotional material for potentially harmful program content. Producers and distributors of explicit material need to stop using these platforms to reach underage audiences. It is duplicitous for the entertainment industry to pat themselves on the back and act like they are behaving responsibly by rating their nearly pornographic content for mature-audiences only, while simultaneously marketing those same programs to 13- and 14-year-old children.

Third, to Regulatory Authorities.

At the request of the Clinton administration, the Federal Trade Commission (FTC) opened an investigation into the marketing of adult entertainment to children. That investigation concluded with a report to Congress in September 2000, in which the agency called on the entertainment industry to be more vigilant in three areas: restricting the marketing of mature-rated products to children; clearly and prominently disclosing rating information; and restricting children’s access to mature-rated products at retail. The FTC updated and added to that review annually for a few years after, but it appears the issue was dropped somewhere around 2009.

It is time for the Federal Trade Commission to reopen its investigations into the marketing of adult-rated content to children, focusing on the entertainment industry’s use of social media platforms as a marketing tool.

Finally, to Congress.

Senators Richard Blumenthal (D-CT) and Marsha Blackburn (R-TN) have introduced the **Kids Online Safety Act (KOSA)**, which would apply to any app or online service that could be used by children ages 16 and under. KOSA will require social media companies, gaming companies and streaming services to establish a "duty of care" for the youth using their platforms. It will give children under 16 tools to

protect their data, turn off "addictive" features and bow out of algorithm-based recommendations. The strongest, most protective settings would be enabled by default for youth. Parents would also get controls to help pinpoint harmful behavior. Social networks will have to prevent and mitigate exposure to inappropriate content, including self-harm, eating disorders, sexual exploitation and alcohol. They will be required to conduct yearly independent audits of their KOSA compliance and the risks to children. Also, social media companies will be required to turn over data to independent researchers to study the issues.

We cannot wait another year to protect kids online.

Fifteen years ago Congress passed the Child Safe Viewing Act of 2007. As [published](#) in the Federal Register of the United States:

The Child Safe Viewing Act of 2007 (S. 602, 110th Cong., adopted December 2, 2008) directs the Federal Communications Commission to initiate a proceeding to examine "the existence and availability of advanced blocking technologies that are compatible with various communications devices or platforms" and can be used by parents to shield their children from objectionable video or audio programming. Although the development of new media technologies and platforms offers learning opportunities for children, it also poses new dangers. This Notice of Inquiry will examine tools currently available to parents and under development to help them supervise how their children use the media and, as directed by the Child Safe Viewing Act, the Commission will submit a report to Congress detailing its findings.

Neither TikTok nor Instagram even existed when this legislation became law. Congress must reauthorize this Act and the FCC must conduct a thorough review to employ 21<sup>st</sup> century technological solutions to help parents protect their children from the proven harm that comes from their exposure to explicit, age-inappropriate material.