



May 30, 2025

The Honorable Elaine Marzola, Chair
Assembly Commerce and Labor Committee
401 S. Carson St.
Carson City, NV 89701

The Honorable Sandra Jauregui, Vice Chair
Assembly Commerce and Labor Committee
401 S. Carson St.
Carson City, NV 89701

RE: SB 63 - Letter of Opposition

Dear Chair Marzola, Vice Chair Jauregui, and Members of the Committee,

We appreciate the opportunity to provide comments on SB 63. Meta remains committed to providing safe, age-appropriate experiences online. While we share the same goal to make online experiences safer for teens, SB 63 undermines existing safety efforts and parental controls on our services, and is also likely to be found unconstitutional. In that spirit, we respectfully oppose SB 63.

Helping young people stay safe online is one of the most important challenges facing families, parents, and our industry today. We understand parents' concerns, and that's why we [announced](#) Instagram *Teen Accounts*, a fundamentally reimagined experience for teens, guided by parents, and recently [expanded](#) the *Teen Account* experience to Facebook and Messenger. *Teen Accounts* have built-in protections that limit who can contact them and the content they see, and also provide new ways to safely explore their interests.

We've also worked with leading experts in mental health, child development, digital literacy, and more to develop over [50 tools, features, and resources](#) to help teens and families have age-appropriate and positive experiences on our apps. Like you, Meta is committed to the safety and wellbeing of young people, and though we understand that the goal of SB 63 is to protect young people online, the bill will have the opposite effect, harming teens and leaving them vulnerable to harmful content.

We would like to highlight four issues in particular: SB 63's prohibition on the use of personal information in an algorithmic recommendation system undermines existing safety efforts; SB 63 replaces parental choice with a government mandate; SB 63 creates selective enforcement that could result in

litigation; and, SB 63 ignores the critical role of app stores in creating safer online experiences for young people.

SB 63 undermines existing safety efforts.

At Meta, we want to support parents so that they feel empowered when it comes to their teens' online experiences. That is why we launched *Teen Accounts*, specifically designed for young people, to address parents' primary concerns. For example, teens are defaulted into private accounts so unconnected strangers can't see what they post, our strictest messaging restrictions to prevent unwanted contact, and our strictest content settings to filter out age-inappropriate content.

We also want teens to feel good about the time they spend online, so *Teen Accounts* have an automatic 60-minute daily time limit before encouraging them to leave the app, and a default Sleep Mode feature which mutes notifications at night. Parents are also able to further restrict how long teens can use our apps by setting daily limits, blocking access during certain hours, or muting notifications during the day. Teens under 18 are defaulted into *Teen Accounts*, and teens under 16 require a parent's permission to change any of these settings to be less strict.

Unfortunately, Section 18 of SB 63's blunt approach to personalization strips the ability to provide these age-appropriate experiences, as well as, geographically and linguistically appropriate content. This is because the age appropriate features and guardrails on *Teen Accounts* – like content filters, time limits, and recommendations – for example – **are based on personalization**, or information about the user.

Personalization also helps teens discover new like-minded interests and organizations – like local YMCA sports leagues and SAT prep courses, and find, discover and connect with new communities like other incoming freshmen at their university or bereavement support groups in their community. Along with most search engines, news websites, online marketplaces and websites, Meta uses technology to rank and organize content, in a number of ways, including to help us *remove* content that violates our Content Policies and avoid recommending content that is contrary to our Recommendation Guidelines. Just as apps *prioritize* content that is helpful or interesting, they *deprioritize* content to provide protections for teens, for example, by using technology to filter out age-inappropriate content and seeking to limit adults from interacting with teens' accounts. Preventing services from deprioritizing or filtering content that may be inappropriate could hamstring their efforts to identify, block, and remove content they categorically forbid.

SB 63 replaces parental choice with a government mandate.

We have a goal of empowering parents and guardians to participate in their teens' online experiences. As written in Section 19, the arbitrary limitations on certain design elements, number of pieces of content, and minutes of viewing do not empower parents or solve their concerns about time spent online. Parents who are worried about their teens spending too much time scrolling or receiving excessive notifications can utilize existing supervision tools to establish boundaries and disable notifications, set time limits, or temporarily restrict access.

Rather than relying on the state to dictate what constitutes "too much" content viewed, parents and guardians should be empowered to utilize parental supervision tools. These tools enable them to make informed decisions about when and how long their children can spend online. By giving parents control over their child's online activities, concerns about excessive scrolling or content consumption can be minimized, allowing them to determine if they want their child to spend more or less time on a particular platform.

SB 63 creates selective enforcement.

SB 63's definition of a "Digital Platform" exempts certain online platforms while imposing obligations on others. SB 63 has continued to add arbitrary carveouts in recent weeks. This uneven approach not only indicates a lack of parity in the bill's application, but also raises constitutional concerns. Courts around the country have recognized the serious constitutional issues with laws that selectively single out particular speakers or types of speech for unique regulatory burdens. For example, a US District court recently issued a **permanent injunction** of Arkansas's *Social Media Safety Act* for singling out some services and exempting others, while also being unconstitutionally vague and placing an undue burden on *protected* speech. Alternatively, legislation that applies equally to all apps and online services available on the internet, regardless of the content, revenue, or identity of the speaker, may be more likely to withstand legal challenge.

SB 63 ignores the critical role of app stores.

In previous testimony and submission of a coalition letter with Snap and X, we shared that our preferred avenue for addressing General Ford's concerns is legislation that requires app stores to obtain parental consent before teens can download apps, **putting parents in control**. We believe that the app store provides the simplest, most consistent, and privacy-protective solution for age assurance and parental consent online.

Today, [95%](#) of teens have access to a smartphone and nearly [9 out of 10](#) teens own an iPhone. On average, teens are using roughly [40 apps per week](#), and new apps are coming online every day. Any legislative approach that requires apps to know the age of users or have parental approval in order to protect teens online must be implemented at the app store level to ease the burden on parents, ensure teens are placed in age-appropriate experiences, and hold all apps that teens use accountable to the same standard.

That's why, at Meta, [we have called for](#) legislation that would require parental consent at the app-store level for teens under 16 to download an app, and a [recent national poll commissioned by the Digital Childhood Alliance](#) found that 88% of parents agree. Such an approach would provide parents the ability to ensure their teens are not accessing content or apps they don't feel comfortable with their teens using and would allow parents to oversee and approve their teen's online activity *in one place* rather than a patchwork of inconsistent requirements that parents would need to navigate within each

individual app. It would also apply to the entire online ecosystem, not just some of the popular apps that teens use.

Further, an app store solution helps preserve privacy by limiting the collection of potentially sensitive identifying information, like government IDs. Rather than having potentially every app collect personal information, an app store could leverage the parental approval system for purchases that *app stores already provide today* – and parents would only have to age verify once – avoiding the need for Nevadans to provide a government ID or other personal information with each and every one of the apps on their phone. Given Section 19 of this bill requires allowing a parent to request the ability to disable certain features, the app store solution is the best approach to establish the parent-child relationship.

We stand by an app store approach and [have integrated it](#) in our own virtual reality app store for Meta Quest. We believe all app stores should follow suit.

This solution to age assurance and parental consent online has now been introduced in 19 states and at the federal level, and signed into law in Utah and Texas.

For these reasons, we respectfully oppose SB 63.

Thank you for the opportunity to submit these comments and we look forward to continued collaboration on these important matters.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Nicole Lopez', with a stylized flourish at the end.

Nicole Lopez

Director of Global Litigation Strategy, Youth