



**Before the  
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION  
Washington, DC 20230  
In the Matter of the Request for Comment on Keeping Children Safe Online,  
(rel. Sep. 28, 2023)**

**Comments of the American Consumer Institute**

Social media has become a part of daily life, especially for younger generations. However, the impacts of social media are not nearly as universal as its use. This means that mitigation of potential harms through blanket public policy lacks the targeted nuance needed to be effective.

To inform the public policy conversation, this comment discusses: the lack of clear causation between social media use and mental health issues among teens; the want of evidence that proposed policies will work as intended; and how legislation is not an adequate replacement for parental involvement.

In the United States, mental illness among young people has risen over the last few years, with depression rates doubling among teenagers between 2009 and 2019.<sup>1</sup> Social media use has grown among young people around the same time, leading to questions of whether the two are linked. Politicians are, in turn, pushing legislation to regulate social media and have largely been posing it as a solution to mental health.

However, consensus on the link between social media and mental health does not exist. Lauren Leffer's article, "Here's How to Actually Keep Kids and Teens Safe Online," discusses in part how the impacts of social media are currently being debated with differing opinions even among experts.<sup>2</sup> Although there is a correlation between high use of social media and poor mental health, there is insufficient causal evidence.<sup>3</sup>

In a large study on the effects of technology use on teenagers' mental health, Amy Orben and Andrew K. Przybylski found a statistically significant but still small

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<sup>1</sup> Cory Turner, "Social Media and Teen Mental Health: 10 Things to Know," *NPR*, February 16, 2023, Accessed October 19, 2023, [Social media and teen mental health: 10 things to know : NPR](#).

<sup>2</sup> Lauren Leffer, "Here's How to Actually Keep Kids and Teens Safe Online," *Scientific American*, September 18, 2023, Accessed October 19, 2023, [Here's How to Actually Keep Kids and Teens Safe Online - Scientific American](#).

<sup>3</sup> *Ibid.*

impact on mental health with other life events and circumstances having a much more substantial impact.<sup>4</sup>

In an article on adolescent mental health, Candice L. Odgers and Michaeline Jensen's examined the correlation between social media use and mental health found that studies showed no clear causation.<sup>5</sup> They also point out that many assumptions about the role of screen time were based on old data when a much smaller population of teenagers were on the internet.

Odgers and Jensen further assert that changes in the internet landscape may make the linkages between internet use and depression no longer relevant, because teenagers were largely in anonymous chat rooms when the connections were first measured. Today, teens are more likely to connect with people they know in real life and use social media to support, rather than replace, in-person social connections.<sup>6</sup> While there has been a correlation between the rise of mental health issues among teenagers and the growing prevalence of social media, research has not shown the causation that would justify expansive legislation.

The lack of consensus on social media should give pause to regulators. It would be a mistake to misdiagnose the root cause and implement a solution that does not work.

Despite a lack of definitive cause and effect, several bills have been proposed at the state and federal levels. At the national level, the Kids Online Safety Act (KOSA) by Senator Blumenthal (D-CT) aims to tackle the mental health crisis by requiring social media platforms to provide parental controls as well as creating a duty of care for social media platforms to remove material deemed harmful to minors.<sup>7</sup>

At the state level, several states have proposed and, in some cases, passed bills to regulate social media use by minors. Utah gained national attention for its far-reaching regulation requiring IDs for children to sign up for social media and establishing a curfew for social media by minors.<sup>8</sup>

The KOSA and similar bills largely miss the mark on what the evidence suggests would help young people better manage their screen time. These bills assume the effects of social media are primarily harmful, and overly broad rules have the potential to limit kids' access to resources that would help them regarding topics related to mental

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<sup>4</sup> Amy Orben, Andrew K. Przybylski, "The Association Between Adolescent Well-Being and Digital Technology Use," *Nature, Human Behaviour* January 14, 2019, Accessed October 19, 2023, [The association between adolescent well-being and digital technology use | Nature Human Behaviour](#).

<sup>5</sup> L. Odgers, Michaeline Jensen, "Adolescent Mental Health in the Digital Age: Facts, Fears, and Future Directions," *Journal of Child Psychology and Psychiatry*, January 17, 2020, Accessed October 19, 2023 [Adolescent Mental Health in the Digital Age: Facts, Fears and Future Directions - PMC \(nih.gov\)](#).

<sup>6</sup> Ibid.

<sup>7</sup> "Kids Online Safety Act (2023; 118th Congress S. 1409)," GovTrack.us, accessed October 19, 2023. [Text of S. 1409: Kids Online Safety Act \(Introduced version\) - GovTrack.us](#).

<sup>8</sup> "Utah Social Media Law Requires Parental Permission for Kids," *NPR*, March 24, 2023, Accessed October 19, 2023, [Utah social media law requires parental permission for kids : NPR](#).

health.<sup>9</sup> Rather than blanket rules, the American Psychological Association (APA) recognizes that social media usage is not necessarily bad for teenagers and that approaches and restrictions should be based on individual needs and development.<sup>10</sup> With everyone requiring different levels of guidance and freedom, legislation is not a practical solution.<sup>11</sup>

To solve the mental health crisis among children and teenagers, it is necessary first to find and resolve the root cause. While the narrative that social media is the culprit has gained traction, the empirical evidence remains unclear. Acting before understanding will lead to unintended consequences.

Respectfully,

Trey Price

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<sup>9</sup> Jeffrey Westling, "Kids Online Safety Act Could Do More Harm Than Good," *American Action Forum*, September 22, 2022, Accessed October 20, 2023, [Kids Online Safety Act Could Do More Harm Than Good - AAF \(americanactionforum.org\)](https://americanactionforum.org/kids-online-safety-act-could-do-more-harm-than-good/).

<sup>10</sup> "Health Advisory on Social Media Use in Adolescence," American Psychological Association, May 2023, Accessed October 19, 2023, [American Psychological Association Health Advisory on Social Media Use in Adolescence \(apa.org\)](https://www.apa.org/health-advisory-social-media-use-adolescence).

<sup>11</sup> Makena Kelly, "Congress is Flooded with Bills for Childproofing the Internet," *The Verge*, May 5, 2023, Accessed October 19, 2023, [Congress is flooded with bills for childproofing the internet - The Verge](https://www.theverge.com/2023/5/5/23544444/congress-childproofing-internet).