



NATIONAL
CENTER ON
SEXUAL
EXPLOITATION

Established 1962

KINDSEY PENTECOST CHADWICK | Interim President

DAWN HAWKINS | CEO

BENJAMIN A. BULL, ESQ. | SVP & General Counsel

BOARD MEMBERS

RON DEHAAS | Chairman
Founder & CEO, Covenant Eyes

DAN O'BRYANT, ESQ. | Vice Chairman
Former Fellow, Weatherhead Center for International
Affairs, Harvard University

RHONDA GRAFF | Secretary
Former Aerospace Program Manager/Industrial Engineer

BETH COONS | Treasurer
Chairman, Farnsworth Companies

NATHAN ANDERSEN, ESQ.
General Counsel, LeSeuer Investments

KINDSEY PENTECOST CHADWICK | Interim President
President Emeritus, ItWorks! International

JOHN FOUBERT, PH.D.
Dean, College of Education, Union University

ROBERT GEORGE, PH.D.
McCormick Professor of Jurisprudence,
Princeton University

HON. TANYA GOULD
Director, Virginia Attorney General's Office on
Human Trafficking

DONALD L. HILTON, M.D.
Neurosurgeon, University of Texas - San Antonio

DONNA M. HUGHES, PH.D.
Retired Professor, Carlson Endowed Chair,
University of Rhode Island

AMBASSADOR SWANEE HUNT
Chair and Founder, Swanee Hunt Alternatives;
Eleanor Roosevelt Lecturer of Public Policy,
Harvard Kennedy School of Government

MARY ANNE LAYDEN, PH.D.
Director, Sexual Trauma and Psychopathy Program,
University of Pennsylvania

MOST REVEREND PAUL S. LOVERDE
Bishop, Dioceses of Arlington, VA, Retired

SHERRY NILLES
National Regent, Catholic Daughters of the Americas

PATRICK A. TRUMAN
President & CEO Emeritus of NCOSE

LINNEA W. SMITH, M.D.
Retired, Psychiatrist

MELEA STEPHENS, L.P.C., M.M.E.T.
Marriage and Family Therapist

JASON SYVERSON
Chair & Chief investment officer, S8
Impact Foundation

CAROLYN WEST, PH.D.
Professor, Clinical Psychology,
University of Washington

March 13, 2024

Mr. Tim Cook
CEO, Apple, Inc.
One Apple Park Way
Cupertino, CA 95014

Re: Apple on 2024 Dirty Dozen List for refusing to detect CSAM on iCloud, failing to default safety features for teens, and dangerous and deceptive App Store practices

Dear Mr. Cook:

We are writing to advise that Apple has been named to the National Center on Sexual Exploitation's Annual Dirty Dozen List, which will be released publicly on Wednesday, April 10, 2024. We are placing Apple on this list of mainstream contributors to sexual abuse and exploitation for Apple's **refusal to detect child sex abuse material on iCloud**, for Apple's decision to **not default nudity blurring and pornography site filters for teens**, and for Apple's **deceptive and dangerous App Store policies and practices**.

Apple has more resources, power, and influence than many nations. Your products are unparalleled in quality and popularity. Your engineers are among the best in the world. And for these reasons, Apple has all the more responsibility and ability to be *the* global leader in ensuring technology not only protects privacy, but also protects the people using your products: especially children.

While we acknowledge that Apple [expanded protections for Apple's youngest users with iOS 17](#),¹ they were too little, too late. When one considers all of Apple's recent decisions around child online safety as a whole, a strong case can be made that **the company has actually set back both internal (within Apple) and external anti-exploitation efforts to safeguard children** at a time when [child exploitation is at an all-time high](#) and accelerating at alarming rates.²

Apple's policy choices have created dangerous precedents that we fear will be used by other tech companies as justification to **also deliberately blind themselves to child sex abuse material (CSAM)** on their platforms and to **deny teens greater protections**, leaving countless young people at risk of child sex abuse, sextortion,

1201 F St. NW, Suite 200, Washington, DC 20004 | 202.393.7245 | EndSexualExploitation.org | public@ncose.com

BUILDING A WORLD WHERE ALL PEOPLE CAN LIVE AND LOVE FREE FROM SEXUAL ABUSE AND EXPLOITATION

grooming, and a host of other crimes and harms. After all, if one of the world's richest and far-reaching entities isn't doing it – why should they? In fact, we have heard this exact rationale from other tech companies with whom we work. Conversely, we've also been told, if Apple did x, y, z to increase child safety, other companies would positively consider doing the same.

Refusing to Detect Child Sex Abuse Material on iCloud

One of the greatest tragedies for survivors of child sex abuse, for families who have lost children due to that trauma, and for overall efforts to end sexual exploitation, was Apple's decision to abandon plans to detect child sex abuse material on iCloud.

Viewed through the lens of prudent business practice, this decision appears illogical when [90% of Americans assert Apple has a responsibility](#) to detect CSAM.³ From a product liability perspective, it's perplexing that Apple wouldn't take more precautions given that 87% of teens own an iPhone and that iPhones routinely [dominate the top 10 best-selling phones](#)⁴ globally every year: thereby making it highly likely [iPhones are disproportionately used](#) to record, share, and obtain child sex abuse material.⁵ And most importantly, from an ethical and human rights perspective, it's unconscionable that **Apple would ignore the pleas of survivors of child sex abuse, their families, and dozens of child safety experts and psychologists, and instead [bend to the backlash of privacy absolutists who fight even the most rudimentary child protection measures](#) at all costs.**⁶

Apple has essentially abandoned child sex abuse survivors who have endured unimaginable trauma through the abuse itself. They also suffer *every moment* that the crime scene content circulates on Apple products. They are re-abused each time those images and videos are viewed again. Children who've suffered this crime must live for the rest of their lives with the knowledge their content is freely traded, used to groom other children, and recruit more offenders. And even if there has not been physical, in-person abuse of a minor, having CSAM content of themselves in the digital world (even if they are the ones who produced and shared it or – as is increasingly the case – their image is used to generate CSAM content through AI), is still deeply traumatic and dangerous, even leading to grooming, sex trafficking, sextortion, or death by suicide due to the mental and emotional distress.

Why does Apple elevate the protection of predators' privacy concerns over victim-survivors' rights to privacy? Would Apple implement some level of detection of CSAM if you knew with certainty it was Apple users being abused? What if it involved your own children? What would it take for Apple to prioritize stemming this crime?

When Apple announced its decision to not detect CSAM on iCloud, the company also noted that expanding Communication Safety was how it would further child protection. While Communication Safety is a necessary tool to ideally prevent children 12 and under from creating new, harmful content, it does not help teens (more on that below), nor does it address the issue of adult perpetrators who are sharing and storing *known* CSAM on iCloud. Current and potential predators will not be receiving prevention warnings and would likely bypass them even if they did. So, these tools, while important, do nothing to stop perpetrators from perpetuating this terrible crime on and through iCloud. Prevention measures must not be conflated with actual detection and reporting of illegal child sex abuse content.

The National Center on Sexual Exploitation stands with [Heat Initiative](#) and the dozens of other child safety organizations and leaders calling on Apple to reverse the disastrous decision to not detect CSAM.⁷ We call on you to ensure Apple is on the right side of history and human decency.

Failure to Default Nudity Blurring Tools and Pornography Filters for Teens

We acknowledge that Apple finally expanded and defaulted Communication Safety for users 12 and under and blocked pornography websites. While [we did applaud this move publicly](#),⁸ in truth it was a great disappointment that it took so long for Apple to implement such a common-sense feature when dating app Bumble has been defaulting nudity blurring for years for their *adult* users. We assert that access to sexually explicit content should be completely blocked – with no option to view or send – for *all* minors, but certainly for children 12 and under. And we remain discouraged that Apple walked back the decision to [alert parents of kids 12 and under if nude images were sent or viewed](#).⁹ We were told that Apple was concerned that children who may be questioning their sexuality may be “outed” to unsupportive parents. While this is a stated concern, Apple could have chosen to not share the context of the content with parents – but rather alert them to a potentially life-altering action by their young child and provide resources and guidance on how to navigate such a situation. One can also make the strong argument that Apple is actively undermining parents’ fundamental responsibility to protect their children from potentially very bad and life-altering choices.

What we utterly fail to comprehend is why Apple refuses to default Communication Safety for teenagers or to offer warning messages – especially when Apple is not detecting CSAM on iCloud and [noted that Communication Safety expansion was its answer to child protection](#).¹⁰

Why doesn’t Apple want to protect teenagers from potentially creating and receiving CSAM and other sexually explicit content (including of and from adults)? Perhaps Apple doesn’t consider 13-17-year-olds kids and doesn’t believe they deserve basic protections in the digital world as they rightly receive offline? If this is Apple’s position it is unconscionable and in conflict with the laws of every state and federal government defining when childhood ends.

When pressed on this decision, Apple told us that they heard from experts that sexting is “healthy” for teens. Apple should not default to such fringe opinions which will always exist. We would like to be introduced to your experts and to review any research Apple used that supports this ludicrous statement. Perhaps your teams are not aware of the sobering statistics of teenagers falling prey to grooming, sextortion, sex trafficking, deepfake pornography creation and sharing, severe bullying due to shared sexually explicit content, and a host of other crimes and harms which [often start with sexting](#).¹¹ [Sextortion of teens is proliferating at such alarming rates that the FBI and other child safety groups have been issuing repeated warnings about the phenomenon](#).¹² **Through the simple action of turning on Communication Safety for teens, Apple could play a major role in preventing and intervening in potentially life-altering situations, educating teens on the many risks** (and often illegality) of sharing sexually explicit content, and providing resources if they are on the receiving end of such content.

And the [damaging effects to teens’ development when viewing hardcore pornography has been well-researched](#): the evidence of harm is irrefutable.¹³ We have shared extensive resources with your team on this matter. Filtering out pornography sites and apps like X and Reddit that allow pornography is a simple step Apple could take to further safeguard teens.

Dangerous and Deceptive App Store Practices and Policies

Since Apple has decided to not detect CSAM on iCloud, nor to default nudity blurring features for teens, **one would think that the very least Apple would do is provide families with accurate information about the apps available, outline the potential risks, and ensure that minors don't have access to or advertisements for highly risky and age-inappropriate apps.** To the contrary, Apple further endangers children by hosting dangerous apps on the App Store and failing to provide accurate age ratings and descriptions of apps.

As you know, the App Store was on the [2023 Dirty Dozen List](#) for these reasons.¹⁴ Yet nothing has improved. In fact, more evidence of App Store negligence has come to the fore.

We have found that **Apple hosts multiple “nudifying” apps, some of them rated age 4+.** Here is just one example: <https://apps.apple.com/us/app/deep-swap-ai-video/id6451139277>.¹⁵

The screenshot shows the App Store listing for 'Deep Swap AI Video'. The app icon features the 'What If?' logo. The title is 'Deep Swap AI Video' with the subtitle 'nudify fake soulgen' and 'Designed for iPhone'. A 'Get' button and 'In-App Purchases' are visible. Below the title, there are four columns of information: AGE (4+ Years Old), DEVELOPER (Ferhat iyibas), LANGUAGE (EN English), and SIZE (75.2 MB).

Only on iPhone

The preview cards show various features of the app: 1. 'DEEP SWAP' with 'BEST FACE CHANGER' and a 5-star rating. 2. 'DEEP FAKE VIDEO' with a play button and 'DF' logo. 3. 'AI FACE SWAP' with 'BEST FACE CHANGER' and a 5-star rating, showing a face being swapped. 4. 'Personal GIFs EMOTIONS & MIMICS' showing a 'Swap Studio' interface with emotion filters like Happy, Shocked, Sad, and Love. 5. 'ENDLESS Face Swaps' showing a 'My Swaps' gallery with a 'Swap New' button and various face swap examples.

What If - Parody Face Swaps
Do you want to see your best friend, colleague, or boss dancing?
Or do you want to morph your face into celebrities?
Ruin reality.

Ferhat iyibas
Website
Support

What If - Parody Face Swaps
Do you want to see your best friend, colleague, or boss dancing?
Or do you want to morph your face into celebrities?
Ruin reality.



Deep Swap AI Video

nudify fake soulgen

Designed for iPhone

Get

In-App Purchases

AGE

4+

Years Old

DEVELOPER



Ferhat iyibas

[Known deepfake pornography apps DeepSwap, SoulGen, and Picso are also available on the Apple App store.](#)¹⁶ Although their app descriptions do not promote their tools for creating nonconsensual sexually explicit images, their advertisements on Facebook and elsewhere highlight this exact capability:

DeepSwap

Face swap Features Pricing Log in Sign up English

Deepswap – AI Deepnude Online App

Deepswap.ai is an online AI deepnude app to generate deepnude videos, photos, and GIFs. Over 150 million users make deepnude content by refacing here, including movie role refacing, gender swaps, face memes, etc. Spoof your friends now!

Deepnude Now →

Get Premium →

Blurred by NCOSE

7 Best Deepnude Apps 2024 (Top 100 Ranked Without Blur) Visit >

Images may be subject to copyright. Learn More

This add showed up when using SoulGen:



NCOSE has many more examples that we would be happy to share with your teams.

We trust *someone* at the Apple empire is aware of and following the rapid metastasis of “nudifying” technology, which disproportionately affects children and women. Have they been tracking the stories of [nudify apps that are being weaponized by teen boys against their female classmates](#)?¹⁷ **This is child sex abuse content and image-based sexual abuse content – yet these tools are on the App Store and our researchers found 10 apps in less than one minute.** Why is Apple not devoting its immense resources to ensure apps like this do not make it to the App Store? Who is reviewing these apps and deciding that a 4+ rating is appropriate?

Apple also inexplicably **reinstated Wizz to the App Store less than two weeks after removing it** when NCOSE alerted your team to the [rampant sextortion and extensive pornography that multiple, reputable entities uncovered on the app](#) (please see attached the emails our team of researchers sent your Trust & Safety Team).¹⁸ [The Network Contagion Research Institute found it was the #3 app for sextortion and the fastest-growing social media platform for sextortion.](#)¹⁹ It seemed that

all it took for this exploitative app to get back on the App Store was a name change and some updated, insufficient policies. We must note that Google has not reinstated this app to the Play store.

We also implore Apple to use the necessary resources to review Telegram, which multiple law enforcement agencies and cyber security specialists are calling the “new dark web.” The extent of and the gravity of the criminal activity on this platform is staggering. It must be removed from the App Store. Telegram is also on this year’s Dirty Dozen List. You can view the evidence we’ve collected on April 10 at <https://endsexualexploitation.org/telegram>.²⁰

In addition to hosting apps built for exploitation, Apple’s descriptions of other, more mainstream, popular apps are grossly insufficient and deceptive: so much so in fact that famed tech expert and creator of PhotoDNA **Hany Farid has started a project called the [App Danger Project](#) to elevate customer reviews of apps on Apple App Store and Google Play warning of child sex abuse and grooming** – something Apple should be doing.²¹

Mr. Cook, did you watch the [January 31 Congressional hearing that brought the CEOs of Meta, X, TikTok, Snapchat, and Discord](#) to account for the extensive harms their apps inflict on young people?²² Have you [read Thorn’s reports](#) surveying 9-17-year-olds about sexual interactions – including with adults online?²³ Do you follow NCMEC and NSPCC and Canadian Centre for Child Protection Centre and Australia eSafety Commissioners research and reports highlighting the extensive dangers posed to children using social media and gaming apps? Why doesn’t **Apple feel compelled to adequately alert families and children to what and to whom they may be exposed online?**

Using just Snapchat as an example, Thorn’s most recent survey found that 21% of 9-17-year-old users of Snapchat had a sexual interaction on the platform.... 14% with someone they believed to be an adult. That’s 1 out of 4 kids having a sexual *interaction*. Yet Apple rates Snap 12+ (despite it being a 13+ platform) and describes it thus:

Age Rating
12+
Infrequent/Mild Sexual Content
and Nudity
Infrequent/Mild Profanity or
Crude Humor
Infrequent/Mild Mature/
Suggestive Themes
Infrequent/Mild Alcohol, Tobacco,
or Drug Use or References

Interactions with adults – let alone *sexual interactions* – are not even listed as a risk. This is gross negligence by Apple for an app that has been [noted by experts as the top app for sextortion](#) alone.²⁴ Snap’s own research has found that [two thirds of Gen Z have been targeted for sextortion](#)!²⁵

Perhaps not as dangerous as sexual interactions with adults and other minors, but still potentially harmful, is the content kids find on Snap’s more public sections such as Discover.

A few weeks ago, it took **less than 10 minutes on a new account set to age 13** for one of our researchers to organically find the following videos and images in Snapchat's Discover section (we'd be happy to provide Apple with screenshots):

- "What women want in bed" with extremely graphic language, suggestions to "take control and grab us," and alcohol promotion to "set the mood."
- A video of a woman pole dancing with the heading "My New Job"
- A teen girl grabbing a teen boy's private area while in the bathroom

20 more minutes led our researcher to:

- "Kiss or slap" a video series where young women in thongs ask men and other women to either kiss them or slap them (usually on the behind)
- Girls in dresses removing their underwear
- Clothed couples simulating sex on beds
- Teenage-looking girls doing Jell-O shots
- Cartoons humping each other

And this is after [Snapchat promised NCOSE](#)²⁶ and [publicly shared](#)²⁷ that they made major improvements to rid Discover of inappropriate, sexualized content.

"Infrequent/mild sexual content"? We vehemently disagree with this description.

We could provide countless examples of dangerous interactions and harmful content not only for Snapchat, but for other 4+ and 12+ App Store-rated apps such as Instagram, TikTok, Roblox, Spotify, etc. We have done so and have offered again to do so, but Apple has refused to meet with us since we put the App Store on the Dirty Dozen List after two years of advocacy pleading for simple, common-sense changes.

We can also share countless examples of inappropriate age ratings for apps. **For example, Cash App, known for sex trafficking, grooming, and CSAM, is rated 4+ and the top 10 search results for 'VPN' in the App Store were rated 4+** (including IPVanish – which Pornhub now uses after its VPNhub was removed from the App Store in December: coincidentally only a few weeks after I highlighted this fact at a [Congressional briefing](#)).²⁸ **Can Apple please explain to us in what possible situation it would be appropriate for a 4-year-old child to use a peer-to-peer payment processor or a VPN?**

Inappropriate ads targeted at children are also a long-standing problem that have been raised by countless advocates with Apple over the years that has not been fixed. Ads for apps that are 12+ like TikTok and apps 17+ (including kink, chatroulette apps, hook-up, dating, and gambling apps) are being directly advertised to kids 12 and under and show up as suggested apps. The same applies to users 12+. When a NCOSE researcher searched "Snapchat" they received app recommendations such as "Oops: One Night Stand." Clearly Apple's [Developer Guidelines](#),²⁹ which state that ads must be appropriate for the app's age rating (*section 1.3 Kids Category*) are not being enforced.

And why are apps like the one below being advertised to *anyone* on the App Store?



Apple has immense influence on these apps – all of whom resist removal from the App Store as noted in this [anecdote from an unredacted lawsuit against Meta in which an Apple employee’s child was solicited by a predator](#).³⁰ The internal Meta document notes that a Meta employee raised concerns that their insufficient child protections could put Facebook at risk of penalization by Apple: “This is the kind of thing that pisses Apple off to the extent of threatening to remove us from the App Store.”

Your company has referred to the App Store as a “walled garden.” Apple serves as the primary gatekeeper to the internet and apps for children and adults alike. But your wall has cracks, your garden is full of weeds, and your gate is broken.

In addition to NCOSE and ally Protect Young Eyes (who have been calling on Apple to fix app ratings since 2019), other leading child safety organizations, such as [5Rights](#)³¹ and [Canadian Centre for Child Protection](#),³² and several [US state attorneys general](#)³³ have also called out the App Store to fix app ratings. Apple has ignored us all.

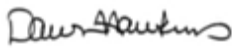
We reiterate here the same requests we have had of Apple for years:

1. Detect CSAM on iCloud and develop “frictionless” user reporting mechanisms throughout Apple products and features (especially iMessage) for Apple’s review.

2. Turn on Communication Safety for teens by default and provide warnings and resources prior to sending or receiving sexually explicit content.
3. Block all sexually explicit content for children 12 and under on Apple’s products.
4. Reform the App Store to ensure appropriate and accurate app age ratings and descriptions. Remove exploitative and dangerous apps from the App Store and cease to advertise age-
5. inappropriate apps to children.

An increasing number of stakeholders – including the public – are taking notice and growing frustrated about Apple’s negligence around child protection. NCOSE is committed to continue increasing awareness around Apple’s refusal to take proactive steps to safeguard young people at a time that has never been more dangerous to be a child. We implore you to prioritize protecting your most vulnerable users with the same passion as you protect privacy.

Thank you for your attention,



Dawn Hawkins

CEO



Kindsey P. Chadwick

Interim President

Cc:

Katherine Adams, Senior Vice President and General Counsel

Eddy Cue, Senior Vice President Services

Craig Federighi, Senior Vice President Software Engineering

Phil Schiller, Apple Fellow, App Store and Events

Attached:

- NCOSE emails to Apple Trust and Safety staff re: Wizz
- 2023 Dirty Dozen List Notification to Apple re: App Store

¹ National Center on Sexual Exploitation, “Apple to Automatically Blur Sexually Explicit Content for Kids 12 and Under, a Change NCOSE had Requested,” news release, June 8, 2023, <https://endsexualexploitation.org/articles/apple-to-automatically-blur-sexually-explicit-content-for-kids-12-and-under-a-change-ncose-had-requested>.

² Will Oremus and Cristiano Lima-Strong, “Child Sex Images are Booming Online. Congress Wants to Know Why,” *The Washington Post*, January 28, 2024, <https://www.washingtonpost.com/technology/2024/01/28/csam-ncmec-senate-hearing-child-porn>.

³ Heat Initiative, *National Sample: Toplines* (Bellwether Research, May 16, 2023), <https://protectchildrennotabuse.org/wp-content/uploads/2023/08/Heat-Initiative-May-2023-Polling-Toplines.pdf>.

-
- ⁴ Sabrina Lam, “Ranked: The 15 Best-Selling Mobile Phones of All Time,” *Visual Capitalist*, January 26, 2024, <https://www.visualcapitalist.com/top-15-most-sold-mobile-phones-all-time>.
- ⁵ Heat Initiative, *Cases Without Perpetrator Details* (Heat Initiative, September 11, 2023), <https://protectchildrenotabuse.org/wp-content/uploads/2023/10/H.I.-Cases-for-the-Website-without-Perpetrator-Details.pdf>.
- ⁶ Parents for Safe Online Spaces, “Letter to EFF Leadership on KOSA Falsehoods,” new release, February 27, 2024, <https://www.parentssos.org/news/kosa-eff-letter>.
- ⁷ Heat initiative, “Apple Campaign,” accessed March 8, 2024, <https://heatinitiative.org>.
- ⁸ National Center on Sexual Exploitation, “Apple to Automatically Blur Sexually Explicit Content,” *ibid*.
- ⁹ John Carr, “Good thinking. Poor execution. Think again Apple,” *Desiderata: Technology Explained*, November 19, 2021, <https://johncarr.blog/2021/11/19/good-thinking-poor-execution-think-again-apple>.
- ¹⁰ Lily Hay Newman, “Apple’s Decision to Kill Its CSAM Photo-Scanning Tool Sparks Fresh Controversy,” *Wired*, August 31, 2023, <https://www.wired.com/story/apple-csam-scanning-heat-initiative-letter>.
- ¹¹ NCOSE, “The Phenomenon of ‘Sexting’ and Its Risks to Youth,” *National Center on Sexual Exploitation*, March 9, 2021, <https://endsexualexploitation.org/articles/the-phenomenon-of-sexting-and-its-risks-to-youth>.
- ¹² FBI Sacramento, “Sextortion: A Growing Threat Preying Upon Our Nation’s Teens,” news release, January 17, 2024, <https://www.fbi.gov/contact-us/field-offices/sacramento/news/sextortion-a-growing-threat-preying-upon-our-nations-teens>.
- ¹³ NCOSE, *The Most Dangerous Playground is Now... in our Kids’ Pockets: Hardcore Pornography on Digital Devices is Damaging America’s Children* (National Center on Sexual Exploitation, 2023), https://endsexualexploitation.org/wp-content/uploads/2023/08/Most-Dangerous-Playground_NCOSE_2023.pdf.
- ¹⁴ NCOSE, 2023 Dirty Dozen List Apple Notification Letter, April 28, 2023, https://endsexualexploitation.org/wp-content/uploads/Apple-App-Store-Notification-Letter_DDL-2023_FINAL.pdf.
- ¹⁵ Ferhat iyibas, “Deep Swap AI Video,” Apple App Store, accessed March 7, 2024, <https://apps.apple.com/us/app/deep-swap-ai-video/id6451139277>.
- ¹⁶ Roopal, “13 Best Free Deepnude Apps for iOS and Android (2024 Reviews),” *AI Mojo*, January 18, 2024, <https://aimojo.pro/free-deepnude-apps-ios-android>.
- ¹⁷ Nikki Main, “AI-powered ‘Nudify’ Apps that Digitally Undress Fully-Clothed Teenage Girls are Soaring in Popularity,” *Daily Mail*, December 10, 2023, <https://www.dailymail.co.uk/sciencetech/article-12841837/nudify-app-ai-advertised-x-twitter-youtube.html>.
- ¹⁸ Ben Goggin and Lora Kolodny, “Canada’s Child Safety Watchdog Warns Parents about Wizz, a Tinder-like App for Teens,” *NBC News*, February 14, 2024, <https://www.nbcnews.com/tech/tech-news/canadas-child-safety-watchdog-warns-parents-wizz-tinder-app-teens-rcna138732>.
- ¹⁹ Paul Raffile, et al., *A Digital Pandemic: Uncovering the Role Of ‘Yahoo Boys’ in the Surge of Social Media-Enabled Financial Sextortion Targeting Minors* (Network Contagion Research Institute (NCRI), January 2024), https://networkcontagion.us/wp-content/uploads/Yahoo-Boys_1.2.24.pdf.
- ²⁰ NCOSE, “Time’s Up for Telegram Ignoring Image-Based Sexual Abuse,” *National Center on Sexual Exploitation*, November 16, 2022, <https://endsexualexploitation.org/articles/telegram-ibsa>.
- ²¹ The App Danger Project, “Is This App Safe for my Child?” accessed March 8, 2024, <https://app-danger.org>.
- ²² U.S. Senate Committee on the Judiciary, “Protecting Children Online,” Committee Activity, accessed February 19, 2024, <https://www.judiciary.senate.gov/protecting-children-online>.
- ²³ Thorn and Benenson Strategy Group, *Youth Perspectives on Online Safety, 2022: an Annual Report of Youth Attitudes and Experiences* (Thorn, November 2023), https://info.thorn.org/hubfs/Research/22_YouthMonitoring_Report.pdf.
- ²⁴ Katie Pedersen and Andreas Wesley, “Social Media Apps that Facilitate Sextortion Blamed for Not Doing Enough to Prevent it,” *CBC News*, November 2, 2023, <https://www.cbc.ca/news/canada/sextortion-social-media-apps-victims-1.7014262>.
- ²⁵ Jacqueline Beauchere, “Two-Thirds of Gen Z Targeted for Online ‘Sextortion’ – New Snap Research,” *WeProtect Global Alliance*, June 21, 2023, <https://www.weprotect.org/blog/two-thirds-of-gen-z-targeted-for-online-sextortion-new-snap-research>.
- ²⁶ Victoria Rousay, “VICTORY! Snapchat Makes Numerous Safety Changes in Response to Dirty Dozen List,” *National Center on Sexual Exploitation*, September 7, 2023, <https://endsexualexploitation.org/articles/victory-snapchat-makes-numerous-safety-changes-in-response-to-dirty-dozen-list>.
- ²⁷ Snap, Inc., “Introducing New Safeguards to Protect our Community,” Snap Privacy and Safety Hub, September 7, 2023, <https://values.snap.com/news/new-safeguards-for-snapchatters-2023>.
- ²⁸ NCOSE, “Hope on the Hill: Advocates Against Sexual Exploitation Unite on Capitol Hill,” *National Center on Sexual Exploitation*, November 2, 2023, <https://endsexualexploitation.org/articles/hope-on-the-hill-advocates-against-sexual-exploitation-unite-on-capitol-hill>.

²⁹ Apple, “App Review Guidelines,” App Review, last modified March 5, 2024, <https://developer.apple.com/app-store/review/guidelines>.

³⁰ Clare Duffy, “Children Targeted with Sexually Explicit Photos on Facebook and Instagram, Lawsuit Claims,” *CNN*, January 19, 2024, <https://www.cnn.com/2024/01/19/tech/meta-child-exploitation-new-mexico-lawsuit/index.html>.

³¹ Natasha Lomas, “Apple, Google Questioned by ICO Over App Age Ratings After UK Child Safety Charity Raises Concerns,” *Tech Crunch*, November 17, 2021, <https://techcrunch.com/2021/11/17/apple-google-get-ico-questions-on-app-age-ratings>.

³² Canadian Centre for Child Protection, *Reviewing the Enforcement of App Age Ratings in Apple’s App Store and Google Play* (Canadian Centre for Child Protection, 2022), <https://endsexualexploitation.org/wp-content/uploads/App-Ratings-Report-by-Canadian-Centre-on-Child-Protection.pdf>.

³³ Austin Knudsen, Montana Attorney General, Letter to Apple Re: TikTok's App Store Age Rating, Montana Department of Justice, December 13, 2022, <https://endsexualexploitation.org/wp-content/uploads/US-Attorneys-General-Demanding-Apple-Change-TikTok-Age-Rating-from-12-to-17.pdf>.

Wednesday, March 6, 2024 at 11:31:12 Eastern Standard Time

Subject: Re: Urgent: remove Wizz from App Store
Date: Tuesday, February 13, 2024 at 7:36:38 PM Eastern Standard Time
From: Lina Nealon
To: [REDACTED]
CC: Victoria Rousay, Dawn Hawkins
Attachments: image001.jpg

Hello Again [REDACTED]

NCOSE and our vast network of allies are deeply concerned – and quite frankly shocked - that the [Wizz app is back on the App Store](#), under a new developer name "VLB" (previously Voodoo), after only two weeks. It doesn't take an expert on these issues to know that the #3 app for sextortion is very unlikely to transform so radically as to become a safe platform for teens in a matter of days.

They claim to have made improvements to their app per the description on the Apple App Store's website such as:

- Mandatory profile verification when creating an account
- Only blue check VERIFIED USERS are allowed on Wizz now, get verified in order to be able to chat
- No more **goofy ads** in the stories

I'm sharing an assessment sent to us by the Canadian Centre for Child Protection of these so-called improvements (we are happy to make an introduction to C3P leadership and Apple if you are not already consulting with them):

What is very noteworthy is the mischaracterization going into their safety/marketing claims.

They refer to now-mandatory "verified users". The issue is they are misusing the term. In nearly all uses of the term, "user verification" means to confirm the identity of an end-user, however what their verification process entails is actually AI-based age estimation based on a provided selfie.

And so to summarize:

- 1. They appear to be leading the public to believe they are verifying the identity of users when they are in fact only approximately age-gating users;*
- 2. They are not actually verifying age, rather they are estimating age using AI, which can have a significant margin of error;*
- 3. **Ensuring only similar-aged users interact does not guarantee increases in safety, as we know many offenders in the case of Sextortion are young in age themselves as they are often involved in organized crime abroad.***
- 4. Put together these marketing claims may give users a false sense of security.*

It should be clear that these “changes” do not warrant Wizz's reinstatement on the Apple App Store.

Has Apple investigated these policy changes? Who on the Apple Team is monitoring what is going on through Wizz? Have they reached out to the entities that have researched and are warning about this app – such as the Network Contagion Research Institute?

To remind you of how harmful this app is:

- Wizz is the **3rd highest app for sexual extortion of minors**
- Wizz ads were **unskippable, pornographic ads** (what Wizz flippantly called “goofy” ads)
- Wizz is targeted to minors to create **romantic connections**

Google has not reinstated the Wizz app on the Google Play Store.

Apple's decision to let **Wizz** resurface raises concerns about Apple’s commitment to user safety. Is changing the developer name all bad actors have to do to slip through the cracks at Apple? Allowing this app back on without addressing the underlying risks undermines Apple's judgment.

NCOSE stands firm and urges Apple to immediately **remove Wizz from the App Store**. Please don’t give room to entities that try to disguise danger with empty promises of safety.

Best,

Lina

From: Lina Nealon [REDACTED]

Date: Monday, January 29, 2024 at 2:13 PM

To: [REDACTED]

Cc: Victoria Rousay [REDACTED] Dawn Hawkins [REDACTED]

Subject: Urgent: remove Wizz from App Store

Hello [REDACTED] -

I’m writing to alert you to an app called **Wizz** about which several child safety experts are sounding the alarm. Described by as the [Tinder for Teens](#) and “[kid tinder](#)” it is primarily targeted at teenagers looking for romantic or sexual connections. This application has become a breeding ground for sextortion, catfishing, and hardcore sexually explicit content, posing a grave threat to the safety and well-being of its users. **Wizz now ranks third in the number of sextortion incidents reported to the National Center for Missing & Exploited Children, trailing only Instagram and Snapchat.**

Investigations into the app, such as those documented by [Paul Raffile](#), [NBC](#), [ICIA](#), another [NBC piece](#) from this weekend, and NCMEC, have exposed some dangerous policies and practices. The app's safety measures have proven to be easily circumvented by criminals, leading to an exponential increase in sextortion cases and unwarranted exposure to pornography through spam, predatory individuals, bots, and unskippable pornographic ads. Reviews of the app on [Bark](#) and the [App Danger Project](#) also expose the severity and depth of harm facilitated by Wizz. It is evident that Wizz is **not safe for minors** and purposefully attracts vulnerable teens who are then subjected to sexual abuse and exploitation - amongst other harms facilitated by the

app, such as [exposure to drugs](#).

While NCOSE typically personally conducts in-depth research ourselves, we do not currently have the bandwidth to investigate more deeply at this moment in time. Therefore, we are providing you with exceptional examples of proof collected by concerned individuals like Paul Raffle and NBC, as well as a few screenshots NCOSE collected as well. **Please see attached evidence.**

It's particularly concerning that **Wizz continues to serve unskippable pornographic ads to minors, a clear violation of both [Apple's App Store](#) and [Google Play's](#) policies.** The failure to address these violations and the insincerity in their responses to the sextortion crisis question the app's commitment to user safety and integrity.

NCOSE and other reputable organizations continuously flag App Store's deceptive app ratings that directly contribute to the sexual abuse and exploitation of minors who own/use your devices. Wizz is no exception. It is rated 12+ on the Apple App Store and T on the Google Play Store. We are writing to Google as well.

We strongly urge you to review Wizz's standing in the App Store and consider its immediate removal until all safety and policy issues are satisfactorily resolved.

NCOSE and others plan to elevate Apple's role in facilitating sexual abuse and exploitation in conjunction with the hearing, and the fact that this app is on the App Store will be one of the talking points.

I also hope Apple will be listening carefully to the hearing and will reevaluate the App Store age rating and descriptions to more accurately describe the grave dangers and high risks to minors on the five apps testifying - as well as countless other social media and gaming apps available on the App Store.

Best,
Lina

Lina Nealon

Vice President & Director of Corporate Advocacy
National Center on Sexual Exploitation
202.430.2607 (c) | EndSexualExploitation.org
[1201 F St NW, Suite 200, Washington, DC 20004](http://1201FStNW.com)



NATIONAL CENTER ON SEXUAL EXPLOITATION
EndSexualExploitation.org



Established 1962

PATRICK A. TRUEMAN, J.D. | *Board Member*
President

DAWN E. HAWKINS
Chief Executive Officer

BENJAMIN W. BULL, J.D.
Sr. Vice President & General Counsel

BOARD MEMBERS

RON DEHAAS | *Chairman*
Founder & CEO, Covenant Eyes

DAN O'BRYAN, J.D. | *Vice Chairman*
Former Fellow, Weatherhead Center for International Affairs, Harvard University

RHONDA GRAFF | *Secretary*
Former Aerospace Program Manager/Industrial Engineer

KEN SUKHIA, J.D. | *Treasurer*
Trial and Appellate Lawyer, Sukhia Law Group, PLC

HADLEY ARKES, PH.D.
Ney Professor of Jurisprudence, Emeritus,
Amherst College

BETH COONS
Chairman, Farnsworth Companies

JOHN FOUBERT, PH.D.
Dean, College of Education, Union University

ROBERT GEORGE, PH.D.
McCormick Professor of Jurisprudence,
Princeton University

DONALD L. HILTON, M.D.
Neurosurgeon, University of Texas - San Antonio

DONNA M. HUGHES, PH.D.
Professor, Carlson Endowed Chair, University of
Rhode Island

AMBASSADOR SWANEE HUNT
Chair and Founder, Hunt Alternatives;
Eleanor Roosevelt Lecturer of Public Policy,
Harvard Kennedy School of Government

MARY ANNE LAYDEN, PH.D.
Director, Sexual Trauma and Psychopathology Program,
University of Pennsylvania

MOST REVEREND PAUL S. LOVERDE
Bishop, Dioceses of Arlington, VA, Retired

SHERRY NILLES
National Regent, Catholic Daughters of the Americas

KINDSEY PENTECOST
President, ItWorks! International

MARGARET RUCKS
Managing Director, Rucks Family Foundation

ALAN SEARS, ESQ.
Former President and CEO, Alliance Defending Freedom

LINNEA W. SMITH, M.D.
Retired, Psychiatrist

MELEA STEPHENS, L.P.C., M.M.F.T.
Marriage and Family Therapist

CAROLYN WEST, PH.D.
Professor of Clinical Psychology
University of Washington

JUSTICE MICHAEL J. WILKINS
Former Associate Chief Justice, Utah Supreme Court

April 28, 2023

Mr. Tim Cook
CEO, Apple, Inc.
One Apple Park Way
Cupertino CA, 95014

Re: Apple App Store on 2023 Dirty Dozen List for Deceptive Rating System

Dear Mr. Cook,

We want to first thank you for the positive changes Apple has made in the past year to further protect children. The improvements to Screen Time in iOS 16 have allowed parents to engage Apple's safety controls more quickly, empowering them to better protect their children. And we hope that the Communication Safety feature in iMessage will prevent at least some children from the potentially life-altering, traumatic effects of [receiving](#)¹ or [sending sexually explicit content](#).²

We've also appreciated our relationship with your talented Trust and Safety Team, with whom we've been consulting since fall 2021 after the National Center on Sexual Exploitation and our ally, Protect Young Eyes, first sent you our letter advocating for ten critical iOS safety fixes (*letter attached*). As you know given our most recent correspondence from February 2023 (*letter attached*), NCOSE and PYE believe that Apple still has a number of significant flaws that continue to threaten children's safety and well-being, especially for those who do not have the privilege of informed and involved parents — or any parents at all.

At a time when teen mental health is on a steep decline and child exploitation continues to rise, Apple holds the unparalleled ability to drastically improve the safety and well-being of children — yet hasn't done so in any truly meaningful way for *all* your young users with the urgency the situation requires.

We are particularly concerned about the deceptive rating system of the Apple App Store, which misleads caretakers and results in serious harms to children — including exposure to predators and

dangerous content. While we acknowledge improvements within some of your products, the App Store has failed to take any positive steps toward child protection.

Apple tells caregivers they “should never have to worry about inappropriate content” in the App Store, and stresses that its age-rating system is there “so parents can determine what is appropriate for their children.”³ Sadly, the App Store’s age-ratings don’t deliver on that promise. Given Apple’s vast global impact, abundant resources, and the fact that [nearly 90% of US teens own an iPhone](#),⁴ **we feel an obligation to more publicly raise awareness of the extensive deception of the Apple App Store ratings in particular as they continue to put children at significant risk.**

Therefore, the **National Center on Sexual Exploitation is placing the Apple App Store on the 2023 Dirty Dozen List**—a campaign that names 12 mainstream contributors to sexual exploitation and abuse. This year’s Dirty Dozen List will be revealed on Tuesday, May 2, 2023. Specifically, we will be noting the following issues regarding the Apple App Store:

1. Grossly misleading and inconsistent age ratings
2. Deceptive app descriptions that don’t adequately describe the content, advertising, dangers, and features that minors may experience in a particular app⁵
3. Lack of enforcement of [Developer Guidelines](#),⁶ which state that ads must be appropriate for the app’s age rating (*section 1.3 Kids Category*)
4. Absence of a reporting system for apps that fail to adequately explain the types of content a user might experience

The case for fixing the Apple App Store rating system, as well as NCOSE’s and PYE’s recommendations for how this may be done, have been extensively outlined in our letters to you, as well as to the 50 US attorneys general. Therefore, we will not repeat them here again, but rather are attaching the aforementioned letters for your review and consideration.

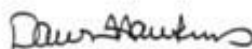
We’d like to make clear that although NCOSE and Protect Young Eyes have been close partners in our advocacy with Apple directly and through our joint Fix App Ratings Campaign of 2019, Protect Young Eyes was not part of the decision to include Apple App Store on the 2023 Dirty Dozen List. However, we have obtained PYE Founder and CEO Chris McKenna’s permission to make public our joint letters to Apple, as well our letter to 50 US attorneys general re: the deceptive Apple and Google app rating systems.

We are hopeful that Apple App Store will make the necessary changes and that Apple embraces being a global leader of both privacy protection *and* child protection. The world’s current and future children are counting on you.

Respectfully,



Patrick Trueman, Esq.
President



Dawn Hawkins
CEO

Cc:

Matt Fischer, Vice President and Head of Worldwide App Store

Katherine Adams, Senior Vice President and General Counsel

Phil Schiller, Apple Fellow

Jesse Blumenthal, Senior Manager

Attached are three joint National Center on Sexual Exploitation and Protect Young Eyes letters

Sent to Apple:

- 10 Critical iOS Child Safety Fixes_AppleLetterFINAL_08.09.21
- 4 Critical iOS Child Safety Fixes_AppleLetterFINAL_02.20.23

Sent to 50 US Attorneys General:

- Letter to 50 Attorneys General re. Deceptive App Ratings

¹ NCOSE, *The Most Dangerous Playground is Now...in Our Kids' Pockets: Hardcore Pornography on Digital Devices Is Damaging America's Children* (National Center on Sexual Exploitation, 2023), https://endsexualexploitation.org/wp-content/uploads/Most-Dangerous-Playground_NCOSE_2023.pdf.

² NCOSE, "The Phenomenon of 'Sexting' and Its Risks to Youth," *National Center on Sexual Exploitation*, March 9, 2021, <https://endsexualexploitation.org/articles/the-phenomenon-of-sexting-and-its-risks-to-youth>.

³ "App Store Homepage," Apple, Inc., accessed April 13, 2023, www.apple.com/app-store.

⁴ "Taking Stock With Teens: Spring 2023 Survey," Piper Sandler, accessed April 21, 2023, <https://www.pipersandler.com/teens>.

⁵ For example, see the recent report of the Canadian Centre for Child Protection, *Reviewing the Enforcement of App Age Ratings in Apple's App Store and Google Play* (Winnipeg, Canada: Canadian Centre for Child Protection, 2022), https://protectchildren.ca/pdfs/C3P_AppAgeRatingReport_en.pdf.

⁶ "App Store Review Guidelines," App Store, Apple, last modified October 24, 2022, <https://developer.apple.com/app-store/review/guidelines>.



February 20, 2023

Mr. Tim Cook
Chief Executive Officer
Apple, Inc.
One Apple Park Way
Cupertino CA, 95014

RE: 4 Critical iOS Child Safety Fixes

Dear Mr. Cook:

We at Protect Young Eyes and the National Center on Sexual Exploitation wanted to thank you for the updates to iOS 16 that simplified parental controls on Apple devices. The streamlining of safety tools protects children and reduces the burden on their caretakers. Unfortunately, there are still several flaws in iOS that threaten children's safety and well-being, especially those who don't have the privilege of informed and involved parents. Please consider these four problems and some suggested solutions:

1. **Problem: The age-default "safety slider" is only accessible under the Family Checklist in Family Sharing.** The new age-default slider is the simplest and most comprehensive way to engage Screen Time protections, [but it is not easily discoverable](#). Additionally, the slider defaults Apple media (e.g., music, books, and podcasts) to "Explicit" for young teens, allowing them access to mature content automatically. Children who are thirteen should not be exposed to explicit content *by default*.

Solution: Consider adding the age-default slider to the top of the Family Sharing display and/or the Screen Time settings for each child. This slider should be the most obvious and accessible setting on every Apple product on which minors are being monitored. When Screen Time safety controls are *not* engaged, periodic push reminder notifications should be sent to parents and a red notification bubble kept visible next to Settings until setup is complete, similar to the reminders given for new Apple Pay users. Also, Apple media should default to "Clean" for young teens, restricting their access to explicit content automatically.

2. **Problem: App ratings are deceptive, [buried deep](#) in the app listing, and don't adequately describe the content, advertising, dangers, and features that minors may experience in the app.** Apple isn't enforcing its own [Developer Guidelines](#), which state that ads must be appropriate for the app's age rating. Children are being exposed to [mature in-app](#) advertisements that reference gambling, drugs, and sexual role-play for apps rated 17+, even when the app is rated 9+ or 12+. Further, there is no system in place to report apps that fail to adequately explain the types of content a user might experience.

We have campaigned for improvements to Apple's app rating system since 2019 when our [FixAppRatings.com](#) movement was created, and a series of [Congressional hearings](#) were held. At these hearings, witnesses testified about the [rampant child sexual exploitation](#) and [blatant rating incongruencies](#) found on apps targeting teens. In 2022, the Canadian Centre for Child Protection created a [44-page booklet](#) highlighting the child protection weaknesses found in the Apple App

Store. Despite these efforts, still nothing has changed regarding the Apple App Store rating system. We believe this app ratings deception represents a critical violation of child safety protocols and solutions must be found and implemented.

Recently, [15 attorneys general wrote a letter](#) asking Apple to change the TikTok rating to 17+ because they believed the current 12+ rating facilitated “the deception of consumers on a massive scale” due to the ease of finding harmful and explicit content unsuitable for children under 17 on the app. We were disappointed to see that instead of improving app store accuracy by correcting TikTok’s deceptive rating, Apple instead chose to quietly adjust YouTube’s rating down to 12+ after being appropriately rated at 17+ for many years. Because no public explanation was given, we cannot understand why this counterintuitive and deceptive ratings change was made.

Additionally, many experts have strongly voiced their concern that 13 is too young for children to be on social media, [including the United States Surgeon General](#). This is due to extensively documented dangers such as [risky features](#), exposure to adult strangers ([including predators](#)), [harmful content](#), [illegal drug activity](#), [concerns about healthy child development](#), [easy access to explicit content](#), and most recently, an [explosion of financial sextortion](#). None of these risks are clearly outlined in the current app descriptions.

Finally, apps that contain large amounts of explicit content (e.g.: Twitter, Reddit) are not clearly labeled as adult apps, and their user agreements allow children 13 and older to join. A [new study](#) found that Twitter is the platform on which the highest percentage of young people reported having seen sexual content (41%). The current App Store description for Twitter deceptively claims “Infrequent/mild sexual content and nudity.” This is blatantly untrue.

Solution: Create an accurate, accountable, obvious, and age-based app rating system with better and more detailed individualized descriptions. The Entertainment Software Ratings Board (ESRB) created a ratings system that could be reasonably applied to apps. This system is more universally understood and aligns with the current Children’s Online Privacy Protection Act (COPPA) minimum age requirement of 13 years old. Apple’s ratings framework should be replaced by a system like the ESRB with *detailed* feature descriptions. Apple must also start enforcing its Developer Guidelines related to the age appropriateness of in-app advertising.

We believe four components are necessary for an effective rating system:

- **Accurate ratings**
- **Accurate and detailed content descriptors**
- **Highly visible ratings**
- **A uniform and accountable system**

More details on these four components can be found in the attachment. This new rating system will provide critical transparency and accuracy for parents as they decide whether an app is safe for their children.

Finally, because Apple has the exact birthdate of the user, which was provided for their Apple ID, children should not be able to download apps with ratings that exceed their actual age without explicit consent from their caretakers. This consent could be given through Apple Family sharing. The Canadian Centre for Child Protection takes it a step further and recommends that [mature apps shouldn’t be suggested](#) to children in the Apple App Store.

- 3. Problem: Apple’s “Downtime” is underdeveloped and offers incredibly limited options for customized screen time management.** The Downtime tool lacks the ability to create multiple time slots to turn off distracting apps during critical times like school, meals, and bedtime. [Multiple studies](#) have shown the negative consequences of unrestricted screen time during these critical developmental times.

Many schools have [banned cell phones](#) because they have been linked to [poor academic performance](#) and [rampant misuse](#). A recent survey by Common Sense Media also found that [30% of children](#) have been exposed to explicit content during school. Additionally, 1 in 3 children in the United States have [used cellphones to cheat on exams](#).

At bedtime, smartphone use has been linked to [less sleep](#), [poor sleep quality](#), [decreased sleep efficiency](#), and [depression](#). According to surveys, [20% of teens reported](#) waking up multiple times at night to check their social media accounts, causing them to feel “constantly tired” at school. Finally, children can be exploited and sexually groomed at night when parents are unable to supervise them.

Solution: Apple should provide more flexible parental control options for caretakers to block selected apps during multiple time slots throughout the day. Third-party paid subscription apps like “Our Pact” provide incredible precision for parents to control which apps can be accessed, downloaded, and the specific times children can use selected apps. Apple’s parental controls should more closely mimic the precision of such third-party apps.

Downtime setup must be streamlined and intuitive, and parents should be provided with notifications to engage these settings for children in their family sharing profile. Downtime time slots should be pre-labeled with names such as school, meals, and bedtime to reduce confusion, promote healthy screen breaks, and encourage proper setup by parents. Sufficient education and resources must be provided to help parents who may struggle with digital literacy or language barriers to help them properly engage these critical features.

- 4. Problem: iMessage lacks basic protections.** Although we applaud the recent decision to use AI to detect potentially explicit content in iMessages, the iOS 16 update took a step backwards by allowing iMessages to be “unsent” for up to two minutes. With young brains, disappearing messages have historically been havens for [bullying](#), [sexting](#), [sextortion](#), and other behavior that is harmful to minors. Young children may also delete messages that parents should be aware of.

Furthermore, even though texting is a common “training ground” for young iPhone users, iMessage inexplicably lacks basic parental monitoring capabilities. Parents cannot prevent the deletion of messages or control message attachments. Although parents can turn on “communication safety” features using Screen Time tools, it is set to “off” by default. Additionally, warnings about potentially explicit incoming messages and self-created child sex abuse material are sent only to the children using the device. Parents are not alerted in either case.

Solution: As part of Screen Time, give parents the ability to block disappearing iMessages and remove the ability for iMessages to be deleted. Allow parents to receive notifications if their child sends or receives an explicit photo (for children 12 and under). This is imperative while young children are learning to use technology responsibly. Communications Safety should also be

turned on by default for all minors based on the age given for the Apple ID, not through Screen Time controls alone.

We have appreciated working with several members of Apple's Trust & Safety Team to identify solutions to these potentially harmful problems. Thank you for your time and we look forward to continuing to advise Apple about how to make your products as safe as possible for *all* your young users and to further empower parents to better prepare and protect their children online.

Sincerely,



Chris McKenna
CEO Protect Young Eyes
chrism@protectyoungeyes.com



Lina Nealon
Vice President & Director of Corporate Advocacy
National Center on Sexual Exploitation
lnealon@ncose.com

Attachment: The Four Protective Pillars of an Effective App Rating System

THE FOUR PROTECTIVE PILLARS OF AN EFFECTIVE APP RATING SYSTEM



The app rating systems used by Apple and Google **are inaccurate, lack sufficient details, aren't highly visible, are inconsistent, and there are few penalties for misrepresentations.** For the protection of children using these platforms, we believe an effective app ratings system must contain these four elements:

1. ACCURATE RATINGS

The content and features in many apps used by millions of children are **inappropriate, harmful, and dangerous.** TikTok, Snapchat, YouTube, and Instagram are rated "12+" by Apple and "Teen" by Google, yet these apps contain frequent and intense sexually explicit material, content promoting suicide and eating disorders, alcohol, tobacco, drug use references, and excessive profanity. Hashtag searches surface thousands of results on these topics and algorithms drive children to this potentially harmful content. Predators can also easily communicate with children through direct messaging. The Children's Online Privacy Protection Act (COPPA) requires children to be 13 years old to use social media and Apple's 12+ rating for most social platforms does not comply with this standard. These ratings inadequacies present real consequences to parents who depend on accuracy when making decisions for their children. Both app stores are facilitating the deception of consumers on a massive scale. **More accurate ratings must be assigned to major social media, video, and photo apps,** including the immediate action of correcting the rating for Instagram, Snapchat, TikTok, and YouTube from "12+" to "17+."

2. ACCURATE CONTENT DESCRIPTORS

Currently, app content descriptors are generic and do not describe an app's true risks to children. In the Apple App Store ratings descriptions are broad and use deliberately vague terms like "infrequent," which can confuse parents and create a false sense of security about an app's safety. Google Play descriptors are scant and hidden within support articles. **App descriptions must be expanded to include detailed content descriptors, interactive elements, and feature summaries of the risks unique to the app.** The Entertainment Software Ratings Board (ESRB) provides 30 easily understood content descriptors, under eight categories, to ensure that parents fully understand the potential risks in video games. App content descriptors should be similar to those used by the ESRB and consequences should be created for missing descriptors.

3. HIGHLY VISIBLE RATINGS

Current app descriptions are hidden deep within the app store listing and in support articles. The Apple ratings descriptions are located at the bottom of the App Store listing, obscured in drop-down menus. Google ratings descriptions aren't included in the app store listing itself and must be found within its "Help" articles. These practices contrast with the Motion Picture Association of America system, which reveals the anticipated rating and type of content in a movie *before* the movie begins. **App ratings and descriptors must be prominent so that parents and children are fully informed of the risks.**

4. UNIFORM AND ACCOUNTABLE SYSTEM

At present, there is no uniformity in the rating systems or accountability to consumers who are harmed through deceptive ratings and descriptions. Google and Apple use different app rating systems and neither system provides an appropriate warning to parents to inform them of the enormous risks that their children may face in an app. Similar to the ESRB, which is consistent across video game creators, both app stores should use industry-standardized descriptors and ratings. **Apple and Google must work together to protect children,** and provide consumers with the accuracy and transparency they deserve by creating a uniform and accountable rating system with penalties for inaccuracy.



August 9, 2021

Mr. Tim Cook
Chief Executive Officer
Apple, Inc.
One Apple Park Way
Cupertino CA, 95014

RE: 10 Critical iOS Child Safety Fixes

Dear Mr. Cook,

Thank you for your significant announcement last week about Apple's efforts to curb the spread of child sexual abuse material. We are thrilled that you are taking a proactive approach to protecting children. These new features will undoubtedly prevent online abuses and enable parents to play a more informed role in how their children navigate technology.

Because of Apple's clear commitment to families, we would like to introduce you to our new #Default2Safety campaign. This campaign was created with input from parents and victims of online harm. We have also spent countless hours researching how device features could be improved to reduce exploitation. We hope you will carefully consider our ten critical changes that could further improve child safety on Apple devices. As a coalition of safety organizations, nonprofits, and parents, we represent thousands of individuals who join us in making this petition.

In June, Google announced that Chromebooks will start featuring new "safety by design" defaults based on the age of users.¹ Both TikTok and Instagram are now also implementing child protections based on the user's birthday. We are certain that Apple can meet and exceed the child safety standards currently being set by other tech companies.

Apple's current parental controls (called Screen Time) are riddled with backdoors and loopholes.² Additionally, Apple's app ratings can be inaccurate and are generic.³ Screen Time setup takes over 30 steps⁴ and many parents do not have the necessary time or knowledge to correctly complete the steps. Unfortunately, there are no automatic default protections for children even though the Apple ID requires the birthday of the child.⁵ Finally, it is not currently possible for parents to control app use during multiple critical times such as school, meals, and bedtime.

¹ Nealon, Lina (June 29, 2021). Major Victory! Google Defaults K-12 Chromebooks and Products to Safety. [Blog post]. Retrieved July 11, 2021, from: <https://endsexualexploitation.org>.

² Albergotti, Reed. (October 15, 2019). Teens Find Circumventing Apple's Parental Controls is Child's Play. [Article]. Retrieved June 29, 2021, from <https://washingtonpost.com>.

³ <https://fixappratings.com>

⁴ McKenna, Chris (October 17, 2020). Apple iOS Parental Controls [Article]. Retrieved June 29, 2021, from <https://protectyouneyes.com>

⁵ Fowler, Geoffrey. (August 23, 2018). We tested Apple's iOS12 Screen Time parental controls. First came tears – then frustration. [Article]. Retrieved Jun e29, 2021, from <https://www.washingtonpost.com/>.

Safety defaults ensure that all children, not just those with wealthy and involved parents, have equal opportunities for protection. We are encouraged that the Screen Time API will soon give outside safety apps improved access to iOS. But our research has shown that relying on third-party apps to fill holes left by Screen Time favors families with time, money, and tech skills.

We are asking Apple to implement the following ten changes to its parental controls:

1. Automatically engage age-based safety defaults during device setup using the birthday given for the Apple ID. Following Google's lead, the "safety by default" approach should also be implemented for all school-issued iPads.
2. Provide additional control over iMessages by giving parents the option to prevent iMessage deletion while their young children are learning to use technology responsibly.
3. Create an accurate, accountable, age-based app rating system with better, individualized descriptions. Currently, some app ratings and descriptions are so misleading that they could be considered "deceptive" under Section 5 of the Federal Trade Commission Act: Unfair or Deceptive Acts or Practices.
4. Close known backdoors and loopholes. For example, if parents remove Safari access, then Apple must find a way to disable in-app browsers. Multiple articles have been written about the many ways that kids easily circumvent Apple's current parental controls.⁶
5. Provide more flexible options for parents to block selected apps during multiple times throughout the day. Apple's "Downtime" is underdeveloped and offers incredibly limited options for screen time management. Imagine Downtime options labeled "School Mode" or "Bedtime" with access to emergency contacts, music, and the calculator.
6. Enforce Apple's published developer rules and remove apps, including Twitter and Reddit, that are breaking critical rules regarding violent and pornographic content. These platforms are not labeled as explicit apps, and their user agreements allow children ages 13+ to join.⁷
7. Block sexualized album covers and explicit song clips when Apple Music is set to "clean." Apple Music should have options that reflect its 4+ App Store rating.
8. Provide a toggle that enforces YouTube Restricted Mode across the entire device.
9. Expand on the recently announced use of on-device artificial intelligence by giving parents the option to receive notifications if their children under age 16 (rather than 13) send/receive explicit images. Also, consider allowing parents to use the same advanced technology in other scenarios, like web browsing, to block explicit content before young children are exposed.
10. Periodically review the top social media apps to ensure that they are adhering to best business practices for privacy, content moderation, and parental controls. Social media apps that do not adequately police harmful content should be given a more mature app rating or be removed from the App Store.

Your company has taken a significant step forward. We believe that you now have the unique **opportunity and responsibility** to further improve child safety and enrich the lives of millions of families. We are asking Apple to implement "safety by design" defaults, like Instagram, TikTok, and

⁶ McKenna, Chris. (October 4, 2019). 12 Ingenious Screen Time Hacks (and solutions) [Blog post]. Retrieved June 29, 2021, from <https://protectyouneyes.com>

⁷ Twitter User Agreement. Retrieved July 11, 2021, from: https://cdn.cms-twdigitalassets.com/content/dam/legal-twitter/site-assets/privacy-policy-new/Privacy-Policy-Terms-of-Service_EN.pdf

Google, and also to make other critical improvements. We welcome the opportunity to work together towards protecting vulnerable children and teens, especially those from marginalized communities.

Please respond by August 25, 2021, so that we can further this conversation in an appropriate timeframe. Responses can be sent to Dawn Hawkins, CEO of The National Center on Sexual Exploitation: dawn@ncose.com. Please copy Lina Nealon: lnealon@ncose.com and Chris McKenna: chrism@protectyoungeyes.com.

Sincerely,

***The National Center on Sexual Exploitation
Protect Young Eyes***

Attachment: Let's Make Apple Safer

Attachment: Why the Screen Time API Isn't the Solution At-Risk Children Need

Supporting Organizations:

Wait Until 8 th	Citizens for Decency
Healthy Screen Habits	End Exploitation Montana
The Save the Kids Foundation	Raising Today's Kids
Better Screen Time	Maryland Coalition Against Pornography
Game Quitters	Lynn's Warriors
Star Guides Wilderness	NextTalk
Everyschool	Educate Empower Kids
Be Broken Ministries	Thriving with 8
Parents Aware	CEASE (Centre to End All Sexual Exploitation)
Hopeful Mom	Walk Her Home
Youth Wellbeing Project	The Looking Up Foundation
Connecting to Protect	eChildhood
Be In Touch	Collective Shout
Defend Young Minds	

Individuals:

Melissa McKay, Child Advocate, RN
Todd Weiler, Utah State Senator
Brady Brammer, Utah State House of
Representatives
Katey McPherson, Child Advocate

LET'S MAKE APPLE SAFER

Defaulting to safety protects "at risk" and marginalized children.

With nearly 90% of teens owning an iPhone (Piper Sandler, 2021), **Apple has the unique responsibility to partner with parents in protecting their children.** In June, Google announced that Chromebooks will start featuring new "safety by design" defaults based on the age of users. Safety defaults ensure that all children, not just those with wealthy and involved parents, have equal opportunities for protection. Relying on third-party apps to fill holes left by Screen Time favors families with time, money, and tech skills.

Apple, please consider these ten critical improvements to protect kids:

1 SAFETY DEFAULTS

Automatically engage age-based safety defaults during device setup using the birthday given for the Apple ID. Examples include shutting off Safari and the App store for young users and engaging SafeSearch for teen users. Block explicit lyrics on music, mature book titles, NC-17 movies, and 17+ apps in the App store for minors and set AirDrop and privacy levels to their most restrictive settings.



2 iMESSAGE CONTROL

Provide greater control over iMessage by giving parents the option to prevent iMessage deletion while their young children are learning to use technology responsibly.



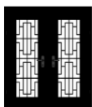
3 APP RATINGS

Create an accurate, accountable, age-based app rating system with better, individualized descriptions. Improvements should also include stricter requirements for third-party in-app advertisements. Currently it is not uncommon for mature ads to be shown on 4+ and 9+ rated apps and some are sexual in nature.



4 CLOSE BACKDOORS

Close known backdoors and loopholes. Example: If parents have removed Safari access, then Apple must find a way to disable in-app browsers. Multiple articles have been written about the many ways that kids can easily circumvent Apple's current parental controls.



5 IMPROVE "DOWNTIME"

Provide more flexible options for parents to block selected apps during multiple times throughout the day. Apple ScreenTime is underdeveloped and offers incredibly limited options for screen time management. Imagine Downtime options labeled "School Mode" or "Bedtime" with access to emergency contacts, music, and the calculator. Parents also need a "shut off the internet now" button that does not depend on pre-programmed settings.



6 ENFORCE APP RULES

Enforce Apple's published developer rules and immediately remove apps, including Twitter and Reddit, that are currently breaking critical rules regarding violent and pornographic content. These platforms are not clearly labeled as explicit apps, and their user agreements allow children ages 13+ to join.



7 CLEAN UP APPLE MUSIC

Block sexualized album covers and explicit song clips when Apple Music is set to "clean." Apple Music should have options that reflect its 4+ App Store rating.



8 YOUTUBE RESTRICTED

Provide a toggle that enforces YouTube Restricted Mode across the entire device.



9 EXPAND USE OF A.I.

Expand on the recently announced use of on-device artificial intelligence by giving parents the option to receive notifications if their children under age 16 (rather than 13) send/receive explicit images. Also, consider allowing parents to use the same advanced technology in other scenarios, like web browsing, to block explicit content before young children are exposed.



10 REVIEW SOCIAL APPS

Periodically review the top social media apps to ensure that they are adhering to best business practices for privacy, content moderation, and parental controls. Given their impact on children, social media apps that don't adequately police harmful content should be given a more mature app rating or removed from the App Store.



DEFAULT2SAFETY.COM



NATIONAL
CENTER ON
SEXUAL
EXPLOITATION



PROTECT
YOUNG EYES

Why the Screen Time API Isn't the Solution At-Risk Children Need

#Default2Safety

At the 2021 Worldwide Developer's Conference (WWDC21), Apple announced the Screen Time API. This marked the first major update in three years to its parental controls. This upcoming iOS 15 update gives third-party safety apps improved access to Screen Time parental controls.⁸

Although we celebrate Apple's innovative improvements requested by the "screentimeapi.com" movement,⁹ the downsides of relying on subscription-based apps to protect children are apparent:

1. Many marginalized and at-risk children won't benefit.

Relying on third-party apps to fill holes left by Screen Time **favours families with time, money, and tech skills.**

2. Even educated and involved parents struggle with extra safety apps.

Setting up third-party software can be **incredibly complicated**. Automatic safety defaults (based on the age used in the Apple ID) immediately provide basic protections to all children. **Google recently implemented safety defaults** on every school issued Chromebook for this reason.

3. It doesn't fix other Screen Time deficiencies.

The Screen Time API **does not address the flaws** inherent in Apple's parental controls, including deceptive App Ratings, an abundance of backdoors and loopholes, and a lack of control over iMessages.

Apple, we applaud your continued innovation and ask that you now consider our ten critical Screen Time improvements. Although the Screen Time API is a move in the right direction, we continue to agree with Apple shareholders who stated that third-party solutions are "clearly no substitute for Apple putting these choices front and center for parents."¹⁰

We must strive to protect all children, especially those whose families cannot afford additional apps or who may not have the time or knowledge to install them properly.

⁸ Meet the Screen Time API. Retrieved August 5, 2021, from: <https://developer.apple.com/videos/play/wwdc2021/10123/>.

⁹ <https://screentimeapi.com/>.

¹⁰ Sheehan, Anne (January 18, 2019). Letter from Jana Partners & CalSTRS to Apple, Inc. [Letter]. Retrieved June 23, 2021, from: <https://corpgov.law.harvard.edu/>



March 9, 2023

The Honorable Austin Knudsen
Office of the Attorney General
Justice Building, Third Floor
215 North Sanders
PO Box 201401
Helena, MT 59620-1401

RE: Deceptive Age Ratings in Apple App Store and Google Play

Dear Attorney General Knudsen:

On behalf of the National Center on Sexual Exploitation and Protect Young Eyes, we applaud your December 13 letters to Messrs. Cook and Pchai, demanding accurate age ratings for TikTok in Apple's and Google's respective app stores.

As leading child safety advocates and experts, we have witnessed the very real consequences of the deception experienced by families outlined in your letters. This deception extends across many apps used by millions of children, not just TikTok. To this end, our organizations have been pressing policymakers, as well as Apple and Google directly, since 2018 to remedy the gross inaccuracies and inconsistencies in the app age ratings process and app content descriptions. We urge you and your fellow attorneys general to consider expanding the specific requests you made of TikTok to other significant apps used by children, including Snapchat, Instagram, and YouTube.

This isn't the first time large entertainment companies have attempted to obscure the graphic content available through their products. In the early nineties, a series of congressional hearings with representatives from Nintendo and Sega were called to examine the extreme violence found in games such as Mortal Kombat and the potential harm it posed to children. At the time, Nintendo and Sega used different rating systems that were vague, disjointed, and deceptive — similar to Apple and Google today. An outcome of those hearings was the creation of the Entertainment Software Rating Board (ESRB) in 1994, which developed a unified and accurate ratings framework for video games sold in North America informing consumers and protecting children.

Despite the creation of this board, the ESRB model has not been applied to social media platforms, even though the actual risks and harms posed to children by these platforms are more egregious than anything seen in video games during the early 1990s.

Predators have unprecedented access to children through social media, video games, and other interactive technologies. They use these platforms to coerce, manipulate, or deceive minors with the intent to produce child sexual abuse material for their own use, to sell, or for sextortion.

Reports of online enticement of children to the National Center for Missing and Exploited Children (NCMEC) [increased by 97.5% between 2019 and 2020](#). A 2021 report by social media monitoring software Bark found that [10% of tweens and 21% of teens](#) encountered predatory behavior from someone online. Another study by anti-trafficking organization Thorn found that [1 in 7 children ages 9-12 shared their own nude images in 2020](#), with 50% of those children having sent them to

someone they had never met in real life (41% believed they were sending the images to an adult). And a [report released](#) in 2023 by Common Sense Media found that 75% of the teenagers surveyed had been exposed to pornography, which we know from countless studies, is [damaging to young people's health and well-being](#). It's no wonder the FBI has issued multiple warnings throughout 2022 about the [rise in sextortion](#) cases involving minors.

Recent testimony from the American Psychological Association's Chief Science Officer attempted to [educate policymakers](#) about why social media platforms are so potent for young, developing brains. According to a recent letter published by Fairplay, an organization dedicated to ending marketing to children through technology, the unprecedented rise in the use of social media by teens is happening at a time when teens are at increased risk for self-harm. According to the Center for Disease Control (CDC) [one in five teens](#) have considered suicide in 2021, making it the second leading cause of death for U.S. youth, and eating disorder emergency room admissions for teen girls ages 12 to 17 years old have [doubled](#) since 2019. Other illuminating data provided by Fairplay includes:

- Instagram has over [90,000 unique pro-eating disorder accounts](#) with a reach of 20 million followers. Children as young as 9 follow three or more pro-eating disorder accounts. Meta derives an estimated \$230 million annually from pro-eating disorder accounts.
- Over half (59%) of U.S. teens report being [bullied on social media](#), an experience linked to risky behaviors such as smoking and increased risk of [suicidal ideation](#).
- It's more difficult for young users to resist temptations to remain online ([Ang & Lee, 2017](#); [Somerville & Casey, 2010](#)), as full brain maturation typically does not occur until age 25, which leaves children and youth vulnerable to dozens of potential years of unregulated social media use.

In 2019, as a result of our grassroots campaign called [Fix App Ratings](#), Mr. McKenna, Founder and CEO of Protect Young Eyes, testified in a hearing called by the Senate Judiciary Committee titled [Protecting Innocence in a Digital World](#). He spoke about how ratings are both vague and deceptive. He suggested that both Google and Apple adopt a ratings system that is accurate, accountable, and transparent — like the ESRB — but nothing was done. Subsequent hearings called by the Senate Commerce Committee, which included testimony from executives representing Snapchat, TikTok, Facebook, and Instagram, also suggested the need for an overhaul to the app ratings process. Again, no changes were made by Apple or Google. Throughout 2021-2022, Protect Young Eyes, the National Center on Sexual Exploitation, and other child-protection organizations engaged Apple and Google directly, asking them to adopt these app store improvements. Unfortunately, these pleas have been largely ignored.

Even more, just two weeks after your letter regarding the inaccuracy of the TikTok rating, Apple quietly lowered YouTube's App Store rating from 17+ to 12+ after being appropriately rated at 17+ for a decade. There was no warning or explanation given to parents about why this change was made.

The FTC has clear guidelines that prohibit false and deceptive advertising under their ["Truth in Advertising" clause](#). We believe these statutes *could be* used to ensure legal consequences for those who perpetrate fraud on consumers.

We seek to not only improve the accuracy of the rating and description of TikTok and other social media apps, but also to hold Apple and Google accountable for *their* role in allowing multiple apps to perpetuate these deceptive practices. We've developed four pillars that describe what an overhaul to the app stores might look like and have included them in an addendum for your consideration.

We stand ready to assist you and your colleagues across the nation in your pursuit of protecting children against app store misrepresentations. We welcome the opportunity to share our research on the rating system, numerous survivor stories, and legislative and litigation options that we are currently pursuing. We look forward to hearing from you at your earliest convenience about how we may be of service.

Sincerely,



Patrick A. Trueman
Attorney At Law
President, National Center on Sexual Exploitation



Chris McKenna
CEO, Protect Young Eyes

Attachment: Four Pillars of an Effective App Rating System

STATEMENT: THE APP RATINGS SYSTEM NEEDS A COMPLETE OVERHAUL AND SHOULD INCLUDE THESE FOUR PROTECTIVE PILLARS



The app rating systems used by Apple and Google are **inaccurate, lack sufficient details, aren't highly visible, are inconsistent, and there are few penalties for misrepresentations.** For the protection of children using these platforms, we believe an effective app ratings system must contain these four elements:

1. ACCURATE RATINGS

The content and features in many apps used by millions of children are **inappropriate, harmful, and dangerous.** TikTok, Snapchat, YouTube, and Instagram are rated “12+” by Apple and “Teen” by Google, yet these apps contain frequent and intense sexually explicit material, content promoting suicide and eating disorders, alcohol, tobacco, drug use references, and excessive profanity. Hashtag searches surface thousands of results on these topics and algorithms drive children to this potentially harmful content. Predators can also easily communicate with children through direct messaging. The Children's Online Privacy Protection Act (COPPA) requires children to be 13 years old to use social media and Apple's 12+ rating for most social platforms does not comply with this standard. These ratings inadequacies present real consequences to parents who depend on accuracy when making decisions for their children. Both app stores are facilitating the deception of consumers on a massive scale. **A universal standard for ratings must be created with penalties for misrepresentation.**

2. ACCURATE CONTENT DESCRIPTORS

Currently, app content descriptors are **generic and do not describe an app's true risks to children.** In the Apple App Store ratings descriptions are broad and use deliberately vague terms like "infrequent," which can confuse parents and create a false sense of security about an app's safety. Google Play descriptors are scant and hidden within support articles. **App descriptions must be expanded to include detailed content descriptors, interactive elements, and feature summaries of the risks unique to the app.** The Entertainment Software Ratings Board (ESRB) provides 30 easily understood content descriptors, under eight categories, to ensure that parents fully understand the potential risks in video games. App content descriptors should be similar to those used by the ESRB and consequences should be created for missing descriptors.

3. HIGHLY VISIBLE RATINGS

Current app descriptions are **hidden deep within the app store listing and in support articles.** The Apple ratings descriptions are located at the bottom of the App Store listing, obscured in drop-down menus. Google ratings descriptions aren't included in the app store listing itself and must be found within its “Help” articles. These practices contrast with the Motion Picture Association of America system, which reveals the anticipated rating and type of content in a movie *before* the movie begins. **App ratings and descriptors must be prominent so that parents and children are fully informed of the risks.**

4. UNIFORM AND ACCOUNTABLE SYSTEM

At present, there is **no uniformity in the rating systems or accountability to consumers who are harmed through deceptive ratings and descriptions.** Google and Apple represent a duopoly of app store content and yet the two companies cannot agree on a uniform app ratings system, penalties for inaccuracy, or what constitutes an appropriate warning to parents for the enormous risks their children may face in an app. **It's time for Apple and Google to work together to protect children and provide consumers with the accuracy and transparency they deserve by creating a uniform and accountable ratings system.**