



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  
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Lina Nealon  
Vice President & Director of Corporate Advocacy  
National Center on Sexual Exploitation  
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**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.<sup>1</sup> 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.<sup>2</sup> Additionally, Apple's app ratings can be inaccurate and are generic.<sup>3</sup> Screen Time setup takes over 30 steps<sup>4</sup> 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.<sup>5</sup> Finally, it is not currently possible for parents to control app use during multiple critical times such as school, meals, and bedtime.

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<sup>1</sup> 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>.

<sup>2</sup> 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>.

<sup>3</sup> <https://fixappratings.com>

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

<sup>5</sup> 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.<sup>6</sup>
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.<sup>7</sup>
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

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

<sup>7</sup> 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](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<sup>th</sup>  
Healthy Screen Habits  
The Save the Kids Foundation  
Better Screen Time  
Game Quitters  
Star Guides Wilderness  
EverySchool  
Be Broken Ministries  
Parents Aware  
Hopeful Mom  
Youth Wellbeing Project  
Connecting to Protect  
Be In Touch  
Defend Young Minds

Citizens for Decency  
End Exploitation Montana  
Raising Today's Kids  
Maryland Coalition Against Pornography  
Lynn's Warriors  
NextTalk  
Educate Empower Kids  
Thriving with 8  
CEASE (Centre to End All Sexual Exploitation)  
Walk Her Home  
The Looking Up Foundation  
eChildhood  
Collective Shout

**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.



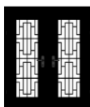
## 3 APP RATINGS

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.<sup>8</sup>

Although we celebrate Apple's innovative improvements requested by the "screentimeapi.com" movement,<sup>9</sup> 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 **favors 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."<sup>10</sup>

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.

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

<sup>9</sup> <https://screentimeapi.com/>.

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