

January 29, 2019

Mark Zuckerberg Chief Executive Officer Facebook, Inc. 1601 Willow Road Menlo Park, CA 94025

Re: Messenger Kids

Dear Mr. Zuckerberg,

One year ago we sent you a letter, signed by more than 100 public health advocates, urging you to discontinue Messenger Kids, Facebook's first social media app designed specifically for children under the age of 13. Shortly after, we sent you a petition signed by more than 21,000 people urging you to end the app. Now, in light of the Center for Investigative Reporting's revelation that Facebook knowingly and intentionally defrauded kids into spending millions of dollars over several years, we write again to demand that you immediately shut down Facebook Messenger Kids, and cease all child-targeted business operations.

Our 2018 letter presented research linking adolescent social media use with depression, poor sleep habits, and unhealthy body image. We asked why, given this research, Facebook was targeting children as young as five, who are even less equipped to navigate the challenges and harms of social media. We pointed out that parents are more concerned with kids' screen time than ever, and warned that Messenger Kids would make families' lives more challenging by giving young children a powerful incentive to move their relationships online.

We now add another serious concern: Facebook's intentionally exploitative motivations and business practices regarding children. These practices, which include viewing children as easy marks to be mined for profit, make it clear that Facebook is unfit to create platforms or products for kids.

On January 24, 2019, the Center for Investigative Reporting published internal documents which appear to demonstrate that Facebook used games to knowingly defraud children and their parents out of money, for as much as several thousand dollars per family.

As early as 2011, the documents show, Facebook knew that kids were spending real money on games without their parents' permission and in some cases unintentionally, but refused to refund these purchases because doing so would hurt revenue. To get their money back, parents had no choice but to initiate chargebacks with their credit card companies or take legal action. In one 3-month period from 2010 - 2011, children spent \$3.6 million on Facebook games, and more than 9% of that money was charged back. This is well above both the .5% industry average and the

2% threshold the FTC considers a flag for deceptive business practices. The chargeback rate in 2014 was similar, suggesting that over several years, Facebook knowingly defrauded kids and families out of millions of dollars. In fact, it appears Facebook did nothing to change these obviously predatory and deceptive practices until a class-action settlement forced its hand in 2016.

These Facebook documents expose manipulation and exploitation, and reveal a corporate culture with deeply disturbing views about children. Facebook employees referred to kids who spent large amounts of money as "whales," a casino-industry term for super high rollers. The practice of a child unintentionally making a purchase was deemed "friendly fraud," and Facebook managers encouraged developers to not take steps to prevent it, instead suggesting they pocket the revenue and offer defrauded players "virtual items" in lieu of a refund. Technological solutions to prevent unintentional purchases by children were rejected because they would threaten revenue.

The documents appear to demonstrate that Facebook is willing to cause actual harm to children and families in its quest for profit. As such, Facebook is unfit to make any platform or product for children, especially one like Messenger Kids, which gives Facebook unfettered access to kids' relationships, conversations, and private moments with friends and family.

Apologies and vague promises to "do better" are simply not enough. If you are serious about demonstrating to the world that Facebook is a force for good, you must stop targeting children and immediately discontinue Messenger Kids.

Sincerely,

Campaign for a Commercial-Free Childhood

Common Sense

Badass Teachers Association, Inc.

Defending the Early Years

Electronic Privacy Information Center

Media Education Foundation

New Dream

Parent Coalition for Student Privacy

Parents Across America

Parents Television Council

Peace Educators Allied for Children Everywhere (P.E.A.C.E.)

Public Citizen

Raffi Foundation for Child Honouring

Story of Stuff

TRUCE (Teachers Resisting Unhealthy Childhood Entertainment)