



10/10/25

To: Chairman Wilson, Vice-chair Lang, Ranking Member Craig, and members of the Senate Financial Institutions, Insurance, and Technology Committee

From: The Rainey Center Freedom Project

Re: Legislative Analysis & Recommendations on SB 167 and SB 175

Chairman Wilson, Vice-chair Lang, Ranking Member Craig, and members of the Senate Financial Institutions, Insurance, and Technology Committee ,

On behalf of Rainey Freedom Project (RFP), an organization that is committed to advancing equality and freedom, I write to comment on Ohio's SB 167 and SB 175 relating to app store policies.

1. We Strongly Support the Protection of Minors Online

RFP shares a commitment to ensuring that minors can experience the benefits of online communities without being exposed to content or practices that might harm their wellbeing. We wholeheartedly endorse the legislature's goal of preventing exploitative or harmful features that target minors. We believe that focusing on the app store adds a crucial layer of protection for minors and a level playing field for companies. However, it is important to pursue the most effective legislation to protect minors. While SB 167 achieves this goal SB 175 would not, creating a patchwork of ineffective legislation.

2. Recent Industry Actions That Benefit Minors

We appreciate that many social media platforms have voluntarily implemented robust measures to protect minors:

- Age-Appropriate Privacy Defaults. Meta (Facebook and Instagram) now defaults new teen accounts to more private settings, limiting who can see their posts and contact them directly.



- Age Verification Innovations. Major platforms are exploring or already deploying artificial intelligence and user feedback loops to detect underage accounts, verify ages, and more quickly address reports.
- Enhanced Parental Controls. Leading platforms offer parents and guardians tools to supervise minors' online activities, set time limits, and control content exposure (e.g., Parental Supervision on Instagram which allows parents to control what content their child sees and how much time is spent on the platform).
- Content Restriction & Moderation. Extensive content moderation systems, including AI detection and human review teams, regularly identify and remove content harmful to children.
- These measures show that many platforms are actively partnering with families and policymakers to foster a safer environment for young users. We encourage the legislature to build on this progress with SB 167.

3. Praise for SB 167

We recognize the crucial impetus behind SB 167 and want to highlight why we believe this approach will be most effective at advancing the twin goals of protecting minors online and advancing innovation. The bill ensures that parents control what applications children have access to and verify age when apps are downloaded.

- **App Store Is The Correct Level To Regulate:** By regulating at the app store level, all companies have a level playing field and consistent policy guidance. This allows for companies to innovate. It's important to establish a universal standard so that applications are not pursuing different policies related to minors.
- **App Store Regulation Protects Minors:** By regulating at the app store level, policymakers can ensure minors are never downloading age inappropriate content.
- **Put Parents In Control:** SB 167 puts parents in control. Families will have different preferences with regard to the use of social media and the goal of public policy should be to empower families, not bureaucrats.
- **SB 167 Aligns With Other State Efforts.** SB 167 builds on legislation in Texas (TX SB 2420) and Utah (SB 142), creating a unified state-level legislative framework.

4. Concerns about SB 175



We also write to raise concerns about SB 175, a similar, but flawed legislation. While we appreciate the enthusiasm of lawmakers to protect minors, SB 175 does not achieve this result as effectively as SB 167. SB 175 makes it optional to estimate users' ages—only requiring verification when a user challenges their classification as a minor. SB 175 includes duplicative voluntary age assurance creating an unconstitutional mechanism that has already been enjoined by the Courts in Ohio.

- **App Store Is The Correct Level To Regulate:** By regulating at the app store level, all companies have a level playing field and consistent policy guidance. While SB 167 regulates at the app store, SB 175 would also require applications to separately verify age, creating a poor user experience and a patchwork of verification.
- **SB 175 Would Create A State-Level Patchwork:** While SB 167 matches laws passed in Utah, Louisiana and Texas, SB 175 would introduce a patchwork of regulations, creating confusion.
- **Verification, Not Assurance:** While SB 167 requires that app stores verify age, SB 175 requires only assurance. This leaves minors entirely unprotected online.

4. Conclusion

We are excited to support SB 167 which will add a crucial protection for parents and minors while protecting innovation.

At Rainey Freedom Project, we believe that government should put parents in control of minor social media use, and SB 167 does exactly that. However, SB 175 would create a patchwork of unclear guidelines, would not ensure actual age verification and would unnecessarily diminish user experience.

However,

Respectfully submitted,

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