MOTION PICTURE ASSOCIATION

April 13, 2026

Senate Financial Institutions, Insurance and Technology Committee

Re: OH SB 167– App Store Age Verification Legislation

Dear Chairman Wilson and Members of the Committee:

On behalf of the Motion Picture Association, Inc. ("MPA"),[1] I am writing concerning SB 167 (the "Bill"), a bill which would create an age verification and parental consent framework for mobile devices. MPA appreciates the concerns that bills like this aim to address, and it supports the goal of helping parents ensure their children have safe, age-appropriate experiences online. Indeed, MPA is an industry leader in providing parents the necessary tools to make informed decisions about what content their children can access—including with its gold-standard content ratings system for motion pictures.[2] However, the Bill as drafted is overbroad and creates cumbersome burdens on MPA members' streaming services, and critically does nothing to differentiate between applications that have robust age verification and parental controls and those that do not. The Bill would interfere with, rather than promote, existing child safety features that are available on streaming services.

These concerns are outlined further below, and MPA welcomes the opportunity to work with legislators to address these concerns while continuing to advance the important policy interest of protecting children online.

I. THE BILL SHOULD DISTINGUISH SERVICES THAT ALREADY MAINTAIN AGE VERIFICATION & PARENTAL CONTROL MECHANISMS

The Bill does not limit its burdens to applications that have no internal age verification measures or which lack parental controls. Instead, *all* applications must request age and parental consent information from a third-party (an app store) if the application is "likely to be accessed by children"—though in defining this standard, the age of the actual users as determined by the covered manufacturers is not taken into account. This approach is seeking to mitigate potential harm to

[1] The MPA serves as the global voice and advocate of the motion picture, television, and streaming industries. It works in every corner of the globe to advance the creative industry, protect its members' content across all screens, defend the creative and artistic freedoms of storytellers, and support innovative distribution models that expand viewing choices for audiences around the world. The MPA's member studios are Netflix Studios, LLC; Paramount Pictures Corporation; Amazon Studios LLC; Sony Pictures Entertainment Inc.; Universal City Studios LLC; Walt Disney Studios Motion Pictures; and Warner Bros. Entertainment, Inc.

[2] *See* Classification and Rating Administration, https://www.filmratings.com/.

children from applications that do not verify ages of their users **and / or** can be accessed with a free login (or no login) with no additional costs to the user or safeguards to prevent minors from accessing inappropriate content. However, this does not make sense for services that have direct knowledge of accountholders and have spent years developing and improving protections and parental controls for their users.

MPA has an alternative framework which it believes better protects the interests of creating safer online environments for minors, and which recognizes the distinction between services that have adequate safeguards in place and those that may not. To the extent this Bill moves forward, however, MPA seeks amendments that would allow applications like streaming services to continue using their existing, established best practices. For instance, applications that require being an adult to create an account, and which have ratings to permit parents to control their children's access to content, are already satisfying the Bill's policy goals. The Bill should provide a method for developers that voluntarily undertake these measures to continue doing so without participating in a new, bespoke age verification and parental consent framework.

II. THE BILL SHOULD PERMIT SUCH DEVELOPERS TO RELY ON THEIR OWN DATA CONCERNING THEIR CUSTOMERS

The Bill does not provide recognition for multi-user, multi-device services that are shared across multiple members of a family, like many streaming services. Where a single application may be accessed by multiple sub-accountholders, even from a single device, the reliance on a single age signal as envisioned by the Bill creates substantial practical challenges. Once again, MPA has developed a model framework which takes into account the problem of conflicting data as well as the realities of shared devices and accounts. But absent this alternative approach, the Bill as drafted should be amended to address these concerns.

Under this Bill, it appears that if an age signal received from a device indicates that the user is a child, the developer will be responsible for providing various parental control features to the parent (as indicated by a covered manufacturer). While many streaming services will already have the sorts of controls envisioned by the Bill, these are governed at the account level within the application—and control over those defaults and settings is determined by the primary accountholder, regardless of which device they access an account from.

If this Bill moves forward, it should be amended to clearly permit a developer to rely on their own customer data and account settings when offering their services, provided their data is sufficiently reliable, such as data based on a user's credit card information, and the developer chooses to do so.

MPA appreciates the legislature's interest in the issues raised by this Bill, and we are available to discuss alternative frameworks, or amendments to the existing framework, at your convenience. Please contact Arlen Valdivia (arlen_valdivia@motionpictures.org) or Steve Dimon (steve@21consultingllc.com) with any questions.

Sincerely,

Arlen Valdivia
Vice President, State Government Affairs – Midwest Region
Motion Picture Association

* * * *