

Mr. Sundar Pichai
Chief Executive Officer Google, Inc.
1600 Amphitheatre Parkway
Mountain View, CA 94043

Re: Suspending Gemini Rollout Due to the AI Chatbot's Unaddressed, Significant Risks to Young Children

Dear Mr. Pichai,

Once again, it appears that Google is exposing children to significant online safety and privacy risks in its race to promote its latest product. This month, Google [announced](#) it would roll out a version of its Gemini chatbot for users under 13 years old. Google should reverse that decision. AI chatbots cause a litany of well-documented harms, from stunting social development to endangering online safety and privacy. These harms are particularly acute for young children. Google's announcement flies in the face of privacy and online safety laws including the Children's Online Privacy Protection Act¹ and other state design code statutes. As a coalition of consumer advocates and children's online privacy and safety experts, we write to ask Google to halt its rollout of the Gemini chatbot to children under 13.

AI chatbots and [other generative AI products](#) pose heightened risks to young children. Children have [difficulty understanding the difference](#) between an AI chatbot and a human, and AI chatbots can [easily trick a child into trusting it](#).² AI systems, like Gemini, expose young children especially vulnerable to misinformation and manipulation. There are similar, [serious risks](#) to children's mental health and social development,³ as young users may develop a psychological dependence or rely on AI chatbots for untrustworthy information, parasocial companionship, or emotional support. Finally, although Google claims that children's data [would not be used](#) to train its AI, serious data protection and user privacy concerns persist. For example, Google has not identified additional safeguards to ensure that it would not misuse data collected through Gemini for other internal purposes or share it with third parties.

Gemini system itself echoes these concerns. [When asked](#) if it posed risks to children's privacy and safety, it identified many of the above-listed harms. However, the Google announcement disclaimed any responsibility to mitigate these harms or implement safeguards around its own product. Instead, Google unfairly shifts all responsibility onto parents, [recommending](#) that

¹ 16 C.F.R. § 312.4 (Offering Gemini to children likely constitutes a "material change in the collection, use, or disclosure practices to which the parent has consented," under §312.4 of the COPPA Rule, requiring Google to comply with additional notice and consent requirements under the law.).

² Young children, beginning around age 3 through [elementary school](#), [are incredibly credulous, or highly trusting](#), especially when it comes to things they hear from others (called "interpersonal trust"). Though Google's [Family Guide to AI](#) warns that, "AI can make mistakes; put on your thinking cap!... You should always double-check if what AI tells you is right." This is a developmentally inappropriate demand on young kids with potentially harmful consequences.

³ When researchers looked at how children 3-10 years old interact with internet-connected toys like AI chat bots, [they found that they were likely to treat them like a person](#). [Another study](#) "observed that... young children...attributed human-like qualities to the devices and developed an emotional attachment to them." This emotional attachment can disturb or, in extreme cases, displace essential real-life interactions, and can be detrimental to children's healthy social-emotional development.

parents teach their children how to fact-check Gemini's answers, remind their children that Gemini isn't human, and instruct their children not to disclose sensitive personal information to the AI chatbot. While parental involvement is a key component of children's online safety, the companies creating and financially benefitting from these highly complex systems are the ones who best understand their products and are in the best position to take meaningful action on safety, fitness, and compliance with legal obligations. If Google wants to market its products to children, it is Google's responsibility to ensure that the product is safe and developmentally appropriate for those children, which it has not done.

Given the substantial harm that AI chatbots like Gemini pose to children, and the absence of evidence that these products are safe for children, Google must suspend its rollout of Gemini for young children under 13.

Sincerely,

Electronic Privacy Information Center
Fairplay
[...]

May ___, 2025

Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Potential COPPA Violations in Google's Rollout of AI Chatbot Gemini to Children

To the Federal Trade Commission:

This month, Google made its artificial intelligence chatbot, Gemini, available to children under 13 who have parent-managed accounts through Google's Family Link system. It notified parents of this change [via an email](#) that indicates the company will not be requiring verifiable parental consent before engaging in this new form of data collection and use. We have submitted the enclosed letter to Google asking it to halt its rollout of the Gemini chatbot to children under 13 until Google produces further research attesting to its safety, legality, and fitness for children and demonstrates sufficient safeguards. Further, we urge the Federal Trade Commission to investigate whether Google – a company with a long history of FTC enforcement actions – is violating the Children's Online Privacy Protection Act (COPPA) in offering this service to children under 13. AI chatbots pose significant risks to children's privacy and wellbeing, and ensuring Google's compliance with COPPA is urgent.

Google's conduct in opening up its Gemini service to children appears to violate COPPA's notice and consent requirements. In its email to parents using Family Link accounts for their children, Google informed parents that "Gemini Apps will soon be available for your children." The email makes clear that if parents do not want their children to use Gemini, they must opt out: "We'll also let you know when your children access Gemini for the first time. You can manage these settings, including turning access off, from the Family Link app or [familylink.google.com](#)." COPPA is clear that opt out mechanisms are insufficient to protect children and their families under the law. Under Sections 312.4 and 312.5 of the COPPA Rule, an operator must take reasonable efforts to provide direct notice and "obtain verifiable parental consent before any collection, use, or disclosure of personal information from children, including consent to ***any material change in the collection, use, or disclosure practices to which the parent has previously consented.***" Offering an AI chat service to child users is a clear example of a material change to Google's collection, use, or disclosure practices.

Parents have the right under COPPA to receive notice and provide verifiable consent *before* their children begin using Gemini. AI chatbots and [other generative AI products](#) pose heightened risks to young children. Children have [difficulty understanding the difference](#) between an AI chatbot and a human, and AI chatbots can [easily trick a child into trusting it](#). AI systems, like Gemini, expose young children especially vulnerable to misinformation and manipulation. There are similar, [serious risks](#) to children's mental health and social development, as young users may develop a psychological dependence or rely on AI chatbots for untrustworthy information, parasocial companionship, or emotional support. It follows that children are highly likely to share personal information with Gemini, despite Google's instruction to parents to tell their children "not to enter sensitive or personal info." Google cannot shift responsibility onto parents

by offering recommendations and an opt-out mechanism. It is Google's responsibility to ensure its products safety, fitness, and compliance with legal obligations, including COPPA.

Finally, the undersigned note that when the updated COPPA Rule becomes effective next month, Google will be required to comply with additional notice requirements under Section 312.4, including the requirements that operators explain how they intend to use a child's personal information, which third parties will receive the child's personal information, and the purpose for that disclosure.

We urge the FTC to investigate Google's conduct in expanding Gemini to children and to hold the company responsible for COPPA compliance to the fullest extent of the law.

Sincerely,

Electronic Privacy Information Center
Fairplay
[...]