

United States Senate

April 10, 2025

Andrew N. Ferguson
Chairman
Federal Trade Commission
600 Pennsylvania Ave NW
Washington, DC 20580

Dear Chairman Ferguson,

We write to urge the Federal Trade Commission (FTC) to open an investigation into the petition submitted by Fairplay against Meta over alleged violations of the Children’s Online Privacy Protection Act (COPPA).¹ The petition contains significant evidence that Meta and its executives knew that children were using Horizon Worlds, its virtual reality (VR) platform, and yet failed to obtain parental consent before collecting their personal information, as COPPA requires. Additionally, an accompanying sworn statement by a new Meta whistleblower further suggests that Meta intentionally ignored child users on Horizon Worlds and disregarded its obligations under COPPA. These accusations deserve the FTC’s attention. The FTC should immediately open an investigation into this petition and take any actions necessary to protect children online.

The Fairplay petition raises serious and troubling allegations. According to the complaint, Meta has knowingly permitted large numbers of children under the age of 13 to access Horizon Worlds using standard adult accounts — accounts that do not require parental notice or consent and that permit extensive data collection. Fairplay documents these findings in multiple manners. First, Fairplay researchers created accounts and interacted with other users in Horizon Worlds. Of the 510 users they encountered, 170 — or one-third — were clearly children based on the sound of their voices.² Additionally, in many circumstances, Meta knew these users were children because its own “community guides” — who participate in the app like other users — acknowledged them and interacted with them.³ Second, Fairplay found that 112 of the 626 reviews submitted on Horizon Worlds between July 1, 2024, and December 9, 2024 mentioned children, with some suggesting that the app was overrun by young users.⁴ Finally, Kelly Stonelake — a former Meta executive turned whistleblower who served as the Director of

¹ Fairplay, Request for Investigation of Meta Platforms, Inc. for Violations of the Children’s Online Privacy Protection Act in Horizon Worlds, Fed. Trade Comm’n (Apr. 7, 2025).

² *Id.* at 167.

³ *Id.* at 19-21.

⁴ *Id.* at 22.

The Honorable Andrew Ferguson

April 10, 2025

Page 2

Product Marketing, including for Horizon Worlds — filed a sworn statement alleging that it “was a widely known issue” within Meta that children were using Horizon Worlds.⁵

As the authors of the *Children and Teens’ Online Privacy Protection Act (COPPA 2.0)*, we take these allegations with the utmost seriousness. Congress originally passed COPPA to safeguard children’s privacy in the face of evolving technological threats. Although the original law needs an update to account for those new threats, Meta appears to have blatantly violated the COPPA requirements. The volume of personal information collected from children in VR — including body movements, facial expressions, voice recordings, eye tracking, and environmental data — renders these allegations especially concerning. Moreover, VR platforms do not merely present screen-based content, they envelop young users in highly interactive, sensory-rich worlds that can blur the boundary between virtual and physical experiences. For those reasons, the allegations in the Fairplay petition deserve urgent attention from the FTC.

We urge you to carefully review the allegations in Fairplay’s complaint and, if warranted, use the full extent of your authority to investigate and address any violations.

Thank you for your attention to this important matter.

Sincerely,



Edward J. Markey
United States Senator



Kathy Castor
Member of Congress

⁵ *Id.* at Appendix A.