Main Street
PRIVACY COALITION

June 24, 2026

Speaker Mike Johnson
U.S. House of Representatives
Washington, DC 20515

Minority Leader Hakeem Jeffries
U.S. House of Representatives
Washington, DC 20515

RE: Ensuring "COPPA 2.0" Subtitle in KIDS Act is Workable for Main Street Businesses

Dear Speaker Johnson and Leader Jeffries:

The Main Street Privacy Coalition (MSPC)[1] supports Congress's goal of strengthening protections for children and teens online and is encouraged to learn that the House is poised to consider legislation to protect children known as the Kids Internet and Digital Safety Act ("KIDS Act"). Our coalition members believe families deserve clear, effective, and enforceable privacy protections, and MSPC has supported the KIDS Act as it advanced through the House Energy and Commerce Committee. We also appreciate the bipartisan work of House leadership and Committee leadership to advance legislation focused on children's online safety.

At the same time, we write to respectfully raise two significant concerns with the newly revised Children and Teens' Online Privacy Protection Act ("COPPA 2.0") subtitle included in the package. We urge Congress to ensure that these unresolved issues are addressed as the legislation moves forward, including in the Senate, so that the final bill protects children while preserving a clear and workable national privacy standard for Main Street businesses.

MSPC members generally operate online services to support ordinary consumer transactions, including product searches, order fulfillment, loyalty programs, customer service, reservations, delivery, and account management. These businesses are not social media platforms or online services directed to children. For that reason, it is important that children's online privacy legislation remain focused, administrable, and appropriately tailored to the online services and data practices that present the greatest risks to children and teens.

MSPC has two narrow but significant concerns with the revised COPPA 2.0 language:

First, the revised language weakens the longstanding national COPPA framework by allowing the same online activity to be governed by potentially inconsistent state requirements. A clear federal standard benefits families, regulators, and businesses by making children's privacy protections understandable, administrable, and enforceable nationwide. Without a durable national standard, general-audience businesses operating across state lines may face inconsistent obligations for the same ordinary customer interactions, making compliance less clear and enforcement less predictable.

Second, the revised knowledge standard could unintentionally sweep in general-audience

[1] The Main Street Privacy Coalition is comprised of national trade associations and companies that represent a broad array of businesses lining America's Main Streets, including retailers, restaurants, grocery stores, convenience stores, hotels, resorts, REALTORS®, auto dealers, gas stations and franchise establishments. For more information, please visit: https://mainstreetprivacy.com

businesses that do not direct their services to children or teens and do not have actual knowledge that a particular user is a minor. For Main Street businesses, uncertainty around whether age should have been known could create pressure to collect, infer, or verify age in ordinary consumer interactions where that information is not currently needed. That result would be inconsistent with data minimization and could increase privacy risks for families.

To address these concerns, Congress should restore the COPPA 2.0 language approved by the House Energy and Commerce Committee's Subcommittee on Commerce, Manufacturing and Trade on December 11, 2025, or make targeted revisions to the current subtitle before advancing the package to the House floor. At a minimum, the legislation should preserve a durable national standard for the collection, use, and disclosure of children's and teens' data online, and clarify that any alternative knowledge standard does not apply to general-audience Main Street businesses based solely on ordinary purchasing activity, generalized audience demographics, product category, household purchases, loyalty program participation, or routine customer interactions.

MSPC stands ready to work with Congress to advance strong children's online privacy protections while avoiding unintended consequences for Main Street businesses and the families they serve. We respectfully urge Congress to address these technical issues as the KIDS Act advances, including through the Senate, so that final legislation protects children, preserves a clear national privacy standard, and remains workable for businesses that serve consumers in communities across the country.

Sincerely,

Main Street Privacy Coalition

cc: Members of the House of Representatives