

April 15, 2023

Dear Members of the Senate Judiciary Committee,

Star Tribune respectfully submits this statement for your consideration.

Star Tribune provides “more about what matters to Minnesotans all day every day” which includes content that we know young Minnesotans will interact with. We produce our product using professional journalism standards. Our enterprise has been doing this for over 150 years and we aim to continue to do so into the future.

The Age-Appropriate Design Code bill (SF2810) is intended protect young Minnesotans from many of the online systems and behaviors that prey on children. Star Tribune applauds the legislature’s engagement on this important issue, but as it is written the bill has many consequences that actually disenfranchise our young people and reduce the civic discourse in our state.

First, this bill appears to be aimed at big platforms like Facebook, Instagram and Tik Tok, but the definition as written will make the Star Tribune accountable to the terms in the bill. Clearly social media platforms have very different missions, resources, and strategies than the Star Tribune and so the provisions make much more sense for regulating those platforms than they do for a local news company making news about Minnesota.

Second, the penalties contemplated in the legislation could easily bankrupt the Star Tribune. According to the census there are 982,783 Minnesotans between 5 and 18 years old. A violation triggered by that entire population would cost 2.4 billion dollars. Even if you took the population of Hopkins High School: 1,611, a violation would be over 4 million dollars. This illustrates how the penalties could easily put the Star Tribune out of business.

Given the scope of the punishment, the Star Tribune would have to consider radical measures to limit risk to our enterprise. As the bill is written now there is considerable room for interpretation about what would cause a violation. For example, what exactly qualifies as a product that would require a data impact assessment? The scope of how

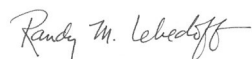
we internally define products ranges from single article to features to small adjustments to the websites to new tools that are added.

The assessment of what is appropriate for children and at what age is an obligation that the bill shifts to the Star Tribune again with a potentially devastating penalty. In this day and age there are many parents who disagree about these qualities but in this bill we are now being asked to make assessments of the appropriateness for all of our products. This is an untenable position for us.

We recently rolled out a program where we offered every school in Minnesota free access to our digital products. This is being done at considerable cost to us as part of an effort to include more resources to the hard-working teachers who are trying to teach our young people civics, current events, reading comprehension, etc. It's an optional program but we get incredible feedback from teachers and students at the 250 schools that participate. We've grown the program's scope by 50% in the last few years. It is hard to imagine how we could continue such a program if we are included in the scope of this bill.

The Star Tribune is a local news organization using journalism practices to help inform Minnesotans. We see this bill as a significant risk to our enterprise and so we strongly encourage the authors to consider a local news exception or to work with us to improve the provisions to allow us to continue our work which we believe is essential for all Minnesotans.

Very Truly Yours,

A handwritten signature in cursive script that reads "Randy M. Lebedoff".

Randy M. Lebedoff