



Google LLC
1600 Amphitheatre Parkway
Mountain View, CA 94043

Google.com

March 24, 2021

The Honorable Cathy McMorris Rodgers
Ranking Member, House Committee on Energy & Commerce
1314 Longworth House Office Building
Washington, DC 20515

The Honorable Bob Latta
Ranking Member, Subcommittee on
Communications & Technology

The Honorable Gus Bilirakis
Ranking Member, Subcommittee on
Consumer Protections & Commerce

The Honorable Michael C. Burgess, M.D.

The Honorable Fred Upton

The Honorable Steve Scalise

The Honorable Brett Guthrie

The Honorable David McKinley

The Honorable H. Morgan Griffith

The Honorable Bill Johnson

The Honorable Billy Long

The Honorable Larry Bucshon, M.D.

The Honorable Markwayne Mullin

The Honorable Richard Hudson

The Honorable Tim Walberg

The Honorable Earl L. "Buddy" Carter

The Honorable Jeff Duncan

The Honorable Gary Palmer

The Honorable Neal Dunn

The Honorable John Curtis

The Honorable Debbie Lesko

The Honorable Greg Pence

The Honorable Dan Crenshaw

The Honorable John Joyce

The Honorable Kelly Armstrong

Dear Ranking Member McMorris Rodgers and esteemed Republican members of the House of Representatives Committee on Energy and Commerce:

Thank you for your letter dated March 11, 2021, regarding your Big Tech Accountability Platform. We welcome the opportunity to address Google's similar commitments to transparency, accountability, objectivity, and support for a competitive publishing industry.

Please find our responses to your questions below.

Big Tech Responsibility:

- 1. As it relates to Google’s content policies regarding advertising and sponsored content, please answer the following:**
 - a. What process does Google undertake to determine whether content violates its policies and is any outside person or third party involved in that process? If so, please identify such outside person or third party and how they are involved.**
 - b. When content is flagged or reported by users, what process does Google undertake to determine whether such content violates its policies? Please explain.**

We enforce our policies using both automated and manual detection and enforcement, and we incorporate third party feedback to assess and address potentially problematic content. In addition to important and useful flags by individual users reporting ads, our sophisticated automated technology helps us detect problematic content at scale. Our automated systems are carefully trained to quickly identify and take action against spam and violative content. This includes flagging potentially problematic content for human reviewers, whose judgment is needed for the many decisions that require a more nuanced determination. The context in which a piece of content is created or shared is an important factor in any assessment about its quality or its purpose. We are attentive to educational, scientific, artistic, or documentary contexts, including journalistic intent, where the content might otherwise violate our policies.

We offer users several pathways to allow outside parties to identify potentially problematic ads or content, for example through the “[report an ad](#)” form, which you can find here at: https://support.google.com/google-ads/contact/vio_other_aw_policy. When an ad or content is identified as potentially problematic, we review that ad or content to determine whether or not it violates our policies.

We work hard to ensure that we protect our users but also allow them to get the information they need, in consonance with our mission.

- c. Does Google have an appeal process to challenge content decisions or decisions to suspend or ban organizations from advertising? If yes, please describe such process.**

We engage with our publishers, advertisers, and content creators to ensure that they are abiding by our policies and so they understand if and how they can come back to our platform after a policy-violation problem. We do that proactively and reactively. For example, on Play, we list all of our developer policies in the [Developer Policy Center](#) (which you can find here at: <https://play.google.com/about/developer-content-policy/>) and engage with App developers through the developer console to ensure they understand our policy

requirements and are aware of potential improvements they can make to help them succeed on the platform. On YouTube, we have an appeals process where creators can request that we re-evaluate their adherence to our policies if they think we have gotten it wrong. We aim to make it easy for developers or creators who are willing to address our concerns in good faith and can reinstate their content or accounts when they do. The same is true for publishers who are able to appeal enforcement actions that we have taken where they feel that they have not breached our policies or where they have addressed the breach and would like to be re-evaluated.

Our advertising policies exist to protect users, advertisers, and publishers from bad actors and ensure that only high-quality ads are served across our platforms. Sometimes advertisers have concerns about enforcement decisions. To address these concerns, we make it clear to advertisers that we have taken action on their content and provide them the opportunity to appeal that decision and give us clarifications. The decision will then be evaluated by a different member of our Trust and Safety team. On the other hand, in cases of serious, repeated, or deceptive violations, we may take action that affects an entire advertiser account.

d. Since January 2020, please list every organization Google has suspended or banned for violating its content policies.

At Google, we have nearly 22,000 people dedicated to monitoring content on our platforms and spent \$1.2 billion last year to ensure the protection of our users. We recently published our [annual Ads Safety Report](#) which gives a sense of the scale of our enforcement efforts (you can find the report here at: <https://blog.google/products/ads-commerce/ads-safety-report-2020/>). In 2020, we blocked or removed 3.1 billion bad ads, which equates to almost 5,900 ads per minute. We suspended more than 1.7 million advertiser accounts for egregious policy violations. And we blocked nearly 100 million COVID-related Google Ads from running on our platforms, including those engaging in price-gouging and promoting products such as fake cures or fake vaccine treatments. We also removed ads from over 1.3 billion publisher pages and 1.6 million publisher sites.

We cannot generally comment on individual sites, pages, or accounts, in the interest of fairness to the advertisers and publishers involved and to inhibit bad actors from attempting to game our systems. That said, we take compliance with our ads policies very seriously and take action in accordance with our policies where appropriate. And we are an industry leader in providing publicly accessible transparency reports on our content decisions. Examples of those reports can be found at: <https://transparencyreport.google.com/?hl=en> and <https://transparencyreport.google.com/youtube-policy/removals?hl=en>.

2. As it relates to news articles on Google search, please answer the following:

- a. What criteria does Google use to determine what news articles appear on its first search page results?**

We understand that connecting our users to high quality news content helps journalism and democracy flourish by bringing new audiences to publishers. We help newspapers earn revenue from digital ads and increase their readership via clicks from Google Search and we are working to help newspapers adapt to an increasingly competitive market. Our Google News Initiative is a \$300 million commitment to help journalism thrive in a digital age. In October 2020, we announced an initial \$1 billion investment in partnerships with news publishers. And last April, we launched a Journalism Emergency Relief Fund to help thousands of small, medium, and local news publishers.

The Google Search index represents more than 100 million gigabytes of data, mapping hundreds of billions of webpages. Whether for news or for other topics, we use algorithms to organize our Search results to give users the most useful and relevant results according to our best understanding of what information they are looking for — as expressed by their search queries.

Usually, multiple pieces of content are relevant to a user's intent, which is why we look to a variety of other factors to rank links to these pieces of content. Our ranking algorithms look for signals that indicate the expertise, authoritativeness, and trustworthiness of every piece of content so that the best results for the user at that time are at the top. In the context of news, they can also look at signals like recency, location, or prominence (whether a news story is covered by many news organizations). One early and well-known example of the type of algorithms we use for Search ranking is PageRank, which uses links on the web to assess the importance of a given website. For more information, please see our dedicated websites on [g.co/howsearchworks](https://www.google.com/howsearchworks) and <https://newsinitiative.withgoogle.com/hownewsworks>.

Reputable independent parties — including *The Economist* — have done in-depth studies of our search results and concluded that they are not politically biased. Just last month, consistent with *The Economist*, New York University reached the same conclusion. (See the New York University - Stern Business School Center for Business and Human Right report here: https://static1.squarespace.com/static/5b6df958f8370af3217d4178/t/60187b5f45762e708708c8e9/1612217185240/NYU+False+Accusation_2.pdf.)

b. Since January 2020, please identify any news article Google has prevented from showing up in search entirely and explain why.

At Google, we believe in open access to information, so we try hard to make information from the web available to everyone. We believe that society works best when it provides a space for all voices to be heard, and that people are best served when they have access to a breadth of diverse content from a variety of sources. While we do have a narrow set of policies related to search features like autocomplete, we do not remove links from search results except in very limited circumstances, including those based on our legal obligations, copyright, webmaster guidelines, spam, and sensitive personal information like government IDs. Please see our policies relating to [removals for legal obligations](https://support.google.com/websearch/answer/9673730) (which you can find here at: <https://support.google.com/websearch/answer/9673730>), [webmaster guidelines](https://support.google.com/webmaster/guidelines) (which you can find here at: <https://developers.google.com/search/docs/advanced/>

[guidelines/webmaster-guidelines](#)), [voluntary removal policies](#) (which you can find here at: <https://support.google.com/websearch/answer/3143948>) and those concerning [removals for copyright infringement](#) (which you can find here at: <https://support.google.com/transparencyreport/answer/7347743?hl=en>), and the section of our [Transparency Report](#) (which you can find here at: <https://transparencyreport.google.com/>) relating to content removals due to [copyright](#) (which you can find here at: <https://transparencyreport.google.com/copyright/overview>), [government requests](#) (which you can find here at: <https://transparencyreport.google.com/government-removals/overview>), and more.

3. Does Google have a process to communicate, consult, and coordinate with law enforcement to address illicit content? If so, please explain.

Protecting our users is always our first priority. While we generally apply our policies independently, we welcome information from our peers and law enforcement to help us ensure the integrity of our platform.

From counter terrorism, to our work to fight against child sexual abuse material (CSAM), to protecting our elections, as well as the work we have done to address the events at the nation's Capitol on January 6 of this year, we have a dedicated team that responds to law enforcement around the clock, every day of the year. We have referred cases to law enforcement when we identified illegal activity on our platform, and do so urgently when we become aware of an imminent threat to life, such as in missing persons cases or in suicide threats.

As our publicly available transparency report describes, we responded to over 100,000 law enforcement requests in the first half of 2020 alone. We proactively made over half a million reports to the National Center for Missing and Exploited Children (NCMEC), and we recently published a [transparency report](#) focused on our efforts to combat online CSAM (you can find our transparency report here at: <https://transparencyreport.google.com/child-sexual-abuse-material/reporting?hl=en>). Just recently, we were [thanked](#) by law enforcement for our work on identifying and combating coordinated influence operations, which you can find here at: <https://www.justice.gov/usao-ndca/pr/united-states-seizes-domain-names-used-iran-s-islamic-revolutionary-guard-corps>.

We are proud of the work we do with law enforcement to protect our democracy and our users, and we describe it in our publicly available Transparency Report. We welcome and value the ongoing discussions with the government and law enforcement on how we can help to protect the public against crime and terrorism.

4. Does Google have a process to preserve evidence of illegal activity on its platform to assist law enforcement? If so, please explain.

We have a robust law enforcement response process with analysts and lawyers dedicated to ensure that we not only appropriately respond to legal processes, including preservation requests, from law enforcement to protect our users, but also make referrals to law enforcement when we identify illegal activity on our platform.

5. How does Google determine what search results show up on the first page? Please identify the specific criteria.

Our company mission is to organize the world's information and make it universally accessible and useful. That's why Search makes it easy to discover a broad range of information from a wide variety of sources. Search ranks websites [based on hundreds of factors](#) (which you can find described here at: <https://www.google.com/search/howsearchworks/>), from relevance to authoritativeness to recency. Search algorithms look at many factors, including the words of your query, relevance and usability of pages, expertise of sources, and a user's location and settings.

There are billions of Search queries around the world every day, and 15% of the searches we see each day are searches that we have never seen before. As such, Search continues to change to meet the evolving needs and expectations of the people who use Google, and to adapt to new tactics of spam or fraud. For these changes, we rely on extensive testing and have a rigorous evaluation process to analyze metrics and decide whether to implement a proposed change. Changes to our ranking algorithms are also informed by feedback from Search raters all around the country and the world who assess updates to Search based on our publicly available [rater guidelines](#), which you can find here at: <https://static.googleusercontent.com/media/guidelines.raterhub.com/en//searchqualityevaluatorguidelines.pdf>. Their feedback helps us understand which changes make Search more useful.) Data from these evaluations and experiments go through a thorough review by experienced engineers and search analysts, as well as other legal and privacy experts, who then determine if the change is approved to launch.

As we [recently announced](#), since 2017 we have done more than a million search quality tests, and we now average more than 1,000 tests per day, which you can find here at: <https://www.blog.google/products/search/our-latest-investments-information-quality-search-and-news/>. And in 2020, we ran over 600,000 experiments that resulted in more than 4,500 improvements to Search quality.

You can learn about how Search works at our How Search Works website which you can find at: <https://www.google.com/search/howsearchworks/mission/>.

6. How often does Google make material changes to its algorithms? Please explain the process Google undertakes to make such changes and provide reasons for such changes.

See answer to question 5.

7. What criteria does Google use to tailor or adjust its algorithms to determine the content users see?

See answer to question 5.

Big Tech Power:

8. Does Google coordinate with Twitter and Facebook on any content decisions? If so, please identify the categories of such content decisions.

Our Trust and Safety teams make content decisions independently based on our transparent policies and according to the processes described in the answers to questions 1a and 1b, above.

We do, however, collaborate with industry in other ways, to protect our platform and the people who use our products:

- **Countering terrorism content:** To substantially disrupt terrorists' abilities to promote terrorism, disseminate violent extremist propaganda, and exploit or glorify real-world acts of violence using our platforms, we have joined with others in the industry to establish the Global Internet Forum to Counter Terrorism (GIFCT). Among other important initiatives, GIFCT allows participating companies and organizations to submit digital fingerprints — “hashes” — of identified terrorist and violent extremist content to a shared database to enable participating platforms to swiftly identify it for removal.
- **Fighting child sexual abuse material:** To help eradicate the horrors of child sexual abuse material, in 2006 Google joined with other industry members in the Technology Coalition. We make cutting-edge technology available for free to qualifying industry and non-governmental organizations in order to help identify, remove, and report CSAM more quickly and at a greater scale. In the last decade-plus, member companies have made progress with the development and roll-out of innovative technology to combat CSAM, and, in 2020, the Coalition announced “Project Protect,” a renewed investment and strategic plan to enhance our collective work. Tools like CSAI Match and Content Safety API, which were developed by Google and YouTube engineers, help prioritize potentially illegal content for review while identifying both known and never-before-seen CSAM. In addition to being used on our platforms, these tools are also being used by companies like Adobe, Tumblr, and Reddit to aid in faster identification of potential victims of CSAM, while reducing the toll on content moderators.
- **Countering online influence operations:** When we find attempts to conduct coordinated influence operations on our platforms, we work to swiftly remove such content and terminate the responsible accounts. We take steps to prevent possible future attempts by the same actors, and routinely exchange information and share our findings with others in the industry. We also share updates about this kind of activity via our [Threat Analysis Group Bulletin](https://blog.google/threat-analysis-group/) (which you can find here at: <https://blog.google/threat-analysis-group/>).

Google also coordinates with our peers and law enforcement on specific or general threats when appropriate.

9. Does Google coordinate with Twitter and Facebook on any decisions related to suspending or banning users, particularly when it comes to advertising decisions? If so, please explain.

See answer to question 8.

10. Does Google coordinate with Twitter, Facebook, or any other tech company to determine which apps are available on the Google Play app store? If so, please explain.

See answer to question 8.

11. Does Google coordinate with Twitter, Facebook, or any other tech company to determine which apps, games, or extensions are available on the Chrome Web Store? If so, please explain.

See answer to question 8.

12. Did Google coordinate with Twitter, Facebook, or any other tech company to make content decisions related to Black Lives Matter riots? If so, please explain.

See answer to question 8.

13. Did Google do anything to reduce access to the October 14, 2020, New York Post article titled “Smoking-gun email reveals how Hunter Biden introduced Ukrainian businessman to VP dad”? If so, please explain.

We enforce our policies consistently and without regard to the political leaning of the content that is on our services. In this case, we did not find a policy violation, and therefore took no enforcement action.

14. Does Google alter its algorithms to drive certain content or narratives based on the political leaning of such content? If so, please explain.

No. Google’s ranking systems are not designed to assess or consider the political leanings of content as we make ranking decisions. Our business model is dependent on being a useful and trustworthy source of information for everyone, so we have a natural, long-term business incentive to prevent anyone from interfering with the integrity of our products.

We design Search and other products with extraordinary care to serve our mission without political bias and have robust systems to ensure that employees’ personal biases do not impact our products and that our policies are enforced without regard to political viewpoint.

Our Search algorithm ranks pages to provide the most useful and relevant information by matching search terms against available web pages and looking at factors like the number of times the words appear and freshness of the page. Political viewpoint is not a factor in our algorithm.

We seek to ensure that our Search results are providing the most authoritative and responsive results by using external quality raters from across 49 U.S. states. Our [Search Quality Rater Guidelines](https://static.googleusercontent.com/media/guidelines.raterhub.com/en//searchqualityevaluatorguidelines.pdf), which you can find here at <https://static.googleusercontent.com/media/guidelines.raterhub.com/en//searchqualityevaluatorguidelines.pdf>, are a public document that provides transparency for ratings, users, and webmasters about how Search works. And they make clear that ratings should never be based on personal opinions, preferences, religious beliefs, or political views.

15. Please explain any efforts Google has undertaken to support local news and traditional media.

Google is committed to supporting open access to information. Our products give people choice and help them find more authoritative and relevant journalism — from international stories to community reporting — than ever before. Over the past 20 years, we have collaborated closely with the news industry and provided billions of dollars to support the creation of quality journalism in the digital age by sharing revenue with news publishers via our ad network, and by developing tools, training, and funding through programs like the Google News Initiative, and launching Google News Showcase. Through both our services and our direct funding of news organizations, Google is one of the world's biggest financial supporters of journalism.

Each month, people click through from Google Search and Google News results to publishers' websites more than 24 billion times. The traffic we send to news sites helps publishers increase their readership, build trust with readers, and earn money. We also pay to license content through initiatives like Google News Showcase, a new online experience that's powered by a \$1 billion investment in news organizations. We have agreements with more than 500 news publications in a dozen countries for Google News Showcase, with more to come. We have also consistently worked to find new ways to support the news industry including the Google News Initiative, through which we provide tools, training, and grant funding to help news organizations evolve in the digital age. The Google News Initiative includes a \$61 million commitment in funding to support more than two thousand news partners across the United States and Canada. In April 2020, we launched a [Journalism Emergency Relief Fund](https://newsinitiative.withgoogle.com/journalism-emergency-relief-fund/) to deliver urgent aid to thousands of small, medium, and local news publishers globally (which you can find described here at: <https://newsinitiative.withgoogle.com/journalism-emergency-relief-fund/>).

Our advertising technology helps news organizations make money by showing ads on their websites, apps, and videos. With respect to digital ad revenue, [publishers kept over 69%](https://blog.google/products/admanager/display-buying-share-revenue-publishers/) of the revenues from digital ads when Google's tools are used, which you can find here at: <https://blog.google/products/admanager/display-buying-share-revenue-publishers/>. The UK Competition and Markets Authority concluded that our fees were in line with or lower than average ad tech fees in the industry. And, as shown in a [blog we published in June](https://www.blog.google/products/admanager/news-publishers-make-money-ad-manager/) 2020, which you can find here at: <https://www.blog.google/products/admanager/news-publishers-make-money-ad-manager/>, news publishers in particular typically handle many parts of their own ad placement and sales, and so typically keep 95% of overall digital ad

revenue generated when using Ad Manager. We help newspapers to earn revenue from digital ads and to increase their readership via clicks from Google Search and Google News.

We also regularly work closely with the news industry to develop products — and evolve existing products — to better address their needs. For example, Google partnered with news publishers to launch Subscribe with Google, a suite of products to help news publishers grow their reader revenue businesses. We also partnered with publishers to develop an open standard that eventually became the Accelerated Mobile Pages (AMP) framework; AMP was designed to help publishers to address changes in user behavior as the prominence of mobile applications and platforms was rising and new, proprietary formats risked creating an unsustainable amount of technical overhead. As one final example, we recently made ranking updates and published changes to our search rater guidelines to help us better recognize original reporting, show it more prominently in Search, and ensure it stays there longer; this was in partnership with, and in response to feedback from, publishers.

We provide meaningful support to the local news industry and will continue these efforts going forward.

Thank you again for your inquiry. We look forward to continuing this conversation in this month's House Energy and Commerce Committee hearing and beyond.

Sincerely,



Mark Isakowitz
Vice President
Government Affairs and Public Policy