

## SENATOR TED CRUZ

### Questions for the Record for Karan Bhatia, Vice President, Government Affairs & Public Policy for Google LLC

1. Please attach a copy of each and every formal or informal policy, whether presently written or otherwise, regarding the moderation, promotion, evaluation, or alteration of content in, or the pricing structure regarding the purchase of services for, or payment for content or the views of content uploaded to, the following products:
  - a. Google Search
  - b. YouTube
  - c. Gmail
  - d. News
  - e. Google Play
  - f. Maps
  - g. Waze
  - h. Any and all advertising products, including but not limited to AdMob, AdSense, Google Ads, and DoubleClick.

Google is committed to transparency in our business practices, including our content moderation efforts. That is why we publish comprehensive guides regarding our policies, such as our “How Search Works” site (<https://www.google.com/search/howsearchworks/>), YouTube’s [Community Guidelines](https://www.youtube.com/about/policies/#community-guidelines) (<https://www.youtube.com/about/policies/#community-guidelines>), our Publisher Center for Google News (<https://support.google.com/news/publisher-center/>), Google Play Policies, including regarding restricted content (<https://play.google.com/about/restricted-content/>), our [Google Maps Content Provider](https://maps.google.com/help/maps/mapcontent/index.html) pages (<https://maps.google.com/help/maps/mapcontent/index.html>), [Waze Local](https://waze.com/business/) (<https://waze.com/business/>), and our Ads policies, including regarding permissible content (<https://support.google.com/adspolicy/answer/6008942>). For YouTube, we also regularly blog about our decisions and changes to our Community Guidelines (see, e.g., <https://youtube.googleblog.com/search/label/community%20guidelines>), and we have a website dedicated to content creators (<https://www.youtube.com/creators/>). We provide information regarding our GSuite services, including pricing for business email with Gmail (<https://gsuite.google.com/pricing.html>), and for Google Ads, we have a site regarding our pricing (<https://ads.google.com/home/pricing/>). We endeavor to make all of our policies and terms and conditions publicly available and easy to find.

2. Research and reporting by NYU Professor of Marketing Scott Galloway suggests that, combined, Facebook and Google (parent company Alphabet) are together worth approximately \$1.3 trillion. He concludes that this figure exceeds the

**world's top five advertising agencies (WPP, Omnicom, Publicis, IPG, and Dentsu) merged with five major media companies (Disney, Time Warner, 21st Century Fox, CBS, and Viacom), and notes that one would still need to add five major communications companies (AT&T, Verizon, Comcast, Charter, and Dish) to approach 90% of Facebook and Google's combined worth.**

- a. What business or product lines does Google consider itself to be in?
  - (1) On what basis does Google make that determination?**
  - (2) Who does Google consider its major competitors in each of these business or product lines?****
- b. Of those business or product lines, what market share does Google believe that it has?**
- c. What other entities provide all of the services that Google does in one place or platform, if any?**
- d. What other entities provide any of the services that Google does?**
- e. What is the relevant product market for each of Google's products and services?**
- f. What is the relevant geographic market for each of Google's products and services?**
- g. Given these relevant geographic and product markets, what is Google's market share in each distinct market in which it operates?**

Google competes in multiple business and product lines, from Search to Ads to Enterprise Software and Cloud services. And in each product line, we face intense competition. While Google may be a market leader in general internet searches, there is significant competition for many types of searches: for example, more than 55% of users conducting shopping-related searches go to Amazon.com first—and third-party surveys have shown that Amazon receives more product queries than all other search engines combined.<sup>1</sup> We also constantly face growing competition from new entrants. For example, the privacy-focused search engine DuckDuckGo just passed 40 million daily average searches, which is four times their average traffic from last year. And we compete against many other companies in areas like Cloud Services (including Microsoft's Azure and Amazon's AWS), Enterprise Software (with Microsoft and Apple, among countless others), and automated driving (with Tesla and GM, for example).

Professor Galloway's methodology conflates market capitalization and market share, and does not take into account the diversity of Google's business, the healthy competition and innovation already existing in the market and emerging each day, and the consumer-centric competition in the marketplace.

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<sup>1</sup> Greg Stirling, *Report: Amazon Grows Lead as Product Search Engine of Choice*, Search Engine Land (Sept. 28, 2016), <http://searchengineland.com/report-amazon-grows-lead-product-search-engine-choice-259985> (showing that in September 2016, 55% of users began their shopping tasks at Amazon, compared with just 28% for all search engines combined).

- 3. Yes or no: Does Google Search promote, demote, prioritize or block webpages or content based in whole or part on an assessment of the social value or social desirability of that webpage or content? If so, please specify each way in which Google does so.**

As our How Search Works page, available at <https://www.google.com/search/howsearchworks/>, describes, we consider many factors in delivering the best Search content to users, but “social value” or “social desirability” are not factors our algorithms use. In addition, as our written submitted testimony describes, there are some narrow circumstances in which Google may remove Search results, such as child sexual abuse imagery or links to spam or malware. More information about those circumstances are available at <https://www.google.com/search/howsearchworks/mission/open-web/>.

- 4. Yes or no: Does Google Search promote, demote, prioritize or block content based in whole or part on its assessment of the content’s truth or falsity? If so, please specify each way in which Google does so.**

As our How Search Works page describes, available at <https://www.google.com/search/howsearchworks/>, we consider many factors in delivering the best Search content to users, including “relevancy” and “quality of content” but “truth or falsity” is not a factor our algorithms use. In addition, as described in our written submitted testimony, there are some narrow circumstances in which Google may remove Search results, such as child sexual abuse imagery or links to spam or malware. More information about those circumstances are available at <https://www.google.com/search/howsearchworks/mission/open-web/>.

- 5. Yes or no: Does Google Search promote, demote, prioritize or block content based in whole or part on its assessment of the content’s agreement or disagreement with Google’s corporate values, beliefs, priorities, or opinions? If so, please specify each way in which Google does so.**

As we also discuss in question 104, below, Larry Page once described the perfect search engine as understanding exactly what you mean and giving you back exactly what you want. A core Google corporate value is ensuring users’ access to a wide variety of useful, relevant, and authoritative information, and we work every day to make our Search products better at achieving that goal. We therefore seek to promote relevant and useful content, and demote irrelevant, low quality and spammy content. In addition, as described in our written submitted testimony, there are some narrow circumstances in which Google may remove Search results, such as child sexual abuse imagery or links to spam or malware. But we strive to ensure that these circumstances are narrow, and we describe those decisions further at <https://www.google.com/search/howsearchworks/mission/open-web/>.

- 6. Yes or no: Does Google Search promote, demote, prioritize or block content based in whole or part on the content-creator’s status as a competitor to Google in any market? If so, please specify each way in which Google does so.**

As our How Search Works page, available at <https://www.google.com/search/howsearchworks/>, describes, we consider many factors in delivering the best Search content to users, but we do not consider whether another organization is a competitor in our algorithms.

- 7. Yes or no: Does Google Search promote, demote, prioritize or block content based in whole or part on the content-creator’s purchase of advertisements or other products or services from Google? If so, please specify each way in which Google does so.**

We sell ads, not Search results. While a content-creator can purchase ads that may appear at the top of Google Search results pages, they cannot pay for changes to our Search algorithms, nor for preferential support with problems they encounter in our organic Search products.

- 8. Yes or no: Does Google Search promote or prioritize its own products or services by listing them above organic search results?**
- a. Yes or no: Does Google Search ever list its products or services above organic search results from competitors when the user’s inquiry does not specifically request Google’s product or service?**
  - b. If yes to question 8(a), does this ever occur when the competitor has a larger market share than the Google product or service in the relevant market?**

The openness of the Internet puts intense competitive pressure on Google to provide users with the best possible answers to their queries. Google’s indexes of online destinations are integrated as seamlessly as possible to make it easier for users to find the information that they are looking for. Specialized results and the information they contain, are not a separate “Google product.” Other search engines, such as Bing, DuckDuckGo, and Yahoo!, have for years enhanced their results with similar specialized formats, reflecting user demand for such enhancements.

Users can easily compare Google’s results with the results they get from other websites. If users, for example, believe that Amazon offers better information about shopping products, or that Yelp offers better information about local places, they can and do use other search products. They can also search for information or digital products and services without using Google at all—through mobile apps, smart home devices, video gaming platforms, chat applications, social networks, and more. Given this competition, it is not in Google’s interest to make it more difficult for users to get the information that they want. Accordingly, the

decision of whether and where to display specialized Search results is based on relevance to the user's query.

- 9. At the July 16, 2019 hearing, Mr. Bhatia said that Google Search may prioritize Google's products and services above organic search results when Google's product or service is more "relevant" or "authoritative."**
  - a. How does Google Search determine whether a Google product or service is more relevant or authoritative to a user than the product or service of a competitor?**
    - (1) If a user enters the inquiry "flights to Houston, Texas," does Google Search treat Google Travel as more or less relevant or authoritative than Expedia, Travelocity, Booking, Priceline and Kayak?**
    - (2) If a user enters the inquiry "jobs in Washington, D.C.," does Google Search treat Google Jobs as more or less relevant or authoritative than Monster.com or Indeed.com?**
  - b. Who determines whether a given website is "relevant" or "authoritative" on a given topic?**
  - c. For inquiries on disputed topics—for example, whether President Trump is performing well in office—how does Google determine what is "relevant" or "authoritative?"**
    - (1) To what extent do these determinations depend on a website's ideological inclinations?**
    - (2) To what extent does Google make value judgments about the relative desirability of a website's message when deciding if it is "relevant" or "authoritative?"**
    - (3) Under what circumstances does Google downgrade, down-rank, remove, censor, or otherwise conceal or de-list a website based on its responses to ideological or political queries requesting an ideological determination or value judgment?**

Numerous factors determine the results Google returns for a user, and our Search ranking systems are made up of not one, but a whole series of algorithms. To give users the most useful information, Search algorithms look at many factors, including the words of users' queries, the relevance and usability of pages, the expertise of sources, and the user's settings. The weight applied to each factor varies depending on the nature of the query—for example, the freshness of the content plays a bigger role in answering queries about current news topics than it does about dictionary definitions.

It is important to understand, no single individual decides what results are returned—or is able to single-handedly change how Search works. We perform thousands of experiments each year, and implemented thousands of changes last year, all with one goal in mind—to provide users the most authoritative and relevant responses to search queries.

As discussed in response to earlier questions, our How Search Works website (<https://www.google.com/search/howsearchworks/>) provides significant information about what factors are considered (or not) in providing Search results, and the narrow circumstances in which Google may remove Search results are discussed at <https://www.google.com/search/howsearchworks/mission/open-web/>.

**10. For purposes of this question, a co-occurrence signal is any mechanism, device, program, or algorithm that triggers the display of a Google product or service based in whole or in part, directly or indirectly, on whether organic search results include a Google competitor.**

- a. Does Google Search currently use any form of co-occurrence signal?**
- b. If Google Search does not currently use any form of co-occurrence signal, what is the last date on which it did so?**

As discussed above, Google has always worked to provide users with the most relevant Search results irrespective of whether the information is derived from a Google or third-party product. Our algorithms are not designed to intentionally suppress a company in Search results simply because it is a competitor. We also rely heavily on extensive user testing to constantly improve our Search results and make them more relevant and useful. Moreover, we test thousands of changes to Search every year. Our rater guidelines are published externally and our raters are drawn from over 40 countries throughout the world.

Competition from other sites on the Internet puts intense competitive pressure on us to ensure users find what they are searching for—regardless of the source. Users can easily compare Google’s results with the results they receive from other websites. For example, if consumers find that Amazon does a better job providing them with information about products, then they will stop using Google and use Amazon instead. In fact, 55% of consumers start their product searches on Amazon and it is a robust competitor. For every type of query—travel, news, local, video, images, etc.—there are many different sites competing with Google to attract users. We must provide users with the information they seek or they will go to our competitors.

**11. What percentage of Google Search queries have local intent—i.e. for what percentage of Google Search queries does Google assume that the user is looking for a local result? For example, a search for “dry cleaners near me” or “nearest dog park” would demonstrate local intent.**

- a. What percentage of Google Search queries on desktop computers have local intent?**
- b. What percentage of Google Search queries on mobile devices have local intent?**
- c. How did Google come to determine the percentages derived for questions 11(a) and (b)?**

Google Search responds to trillions of user queries from around the globe every year, driven by our company mission to organize the world's information and make it universally accessible and useful. We do not have a standard definition for what searches are considered "local intent queries." For example, a user could search for "McDonald's" and receive menu nutrition information, the company's stock price, and restaurant locations, among many other types of information. Whether a user intended this to be a "local intent" search would be unclear.

- 12. What percentage of local intent queries in Google Search result in the user staying within the ecosystem of Google products and services? A search results in a user staying within Google's ecosystem if it results if either: (1) Google offers a suggested answer, recommendation, or location as a result of the search and the user does not click through to a website or service not owned in whole or part by Google, or (2) following the search, the next website or service that the user accesses is owned in whole or part by Google.**
- a. What percentage of local intent queries in Google Search from desktop computers result in the user staying within the ecosystem of Google products and services?**
  - b. What percentage of local intent queries in Google Search from mobile devices result in the user staying within the ecosystem of Google products and services?**

As mentioned above, we do not have a standard definition for what searches are considered "local intent queries" and thus, cannot provide the specific information requested. For example, a user could search for "McDonald's" and receive menu nutrition information, the company's stock price, and restaurant locations, among many other types of information. Whether a user intended this to be a "local intent" search would be unclear.

Google has long sent large amounts of traffic to third parties. We strongly believe that by creating the best Search experience for people around the world, we will overall be able to deliver more traffic to sites across the web. We're always exploring new ways to engage with and ensure we're supporting the web ecosystem.

- 13. An internal Google document leaked last month instructs employees writing search algorithms that only sometimes is the priority factual accuracy. Other times, "it may be desirable to consider how we might help society reach a more fair and equitable state" by manipulating search results. One document specifically states that Google should "intervene for fairness."**
- a. When did Google institute this policy? Is this Google's current policy? If so, please provide a copy of the relevant policy in its entirety. If not, please provide the date when Google terminated this policy.**
  - b. What is Google's definition of "fairness"?**

- c. **Who decides when an algorithm should sacrifice factual accuracy, relevance, or other factors that Google ordinarily uses in determining search rankings in favor of “fairness”?**
- d. **What criteria do the relevant individuals use to determine when an algorithm should sacrifice factual accuracy, relevance, or other factors that Google ordinarily uses in determining search rankings in favor of “fairness”?**
- e. **If Google Search or any other search algorithm in the Google ecosystem applies this policy, does Google inform users of this policy as well as how it is applied?**
- f. **If not, will Google commit to informing users that make search inquiries with results that have been changed due to interventions for “fairness” that Google has so intervened?**

Our business model depends on being a useful and trustworthy source of information. Billions of people use Search to find information, and we feel a deep sense of responsibility to help our users, of every background and belief, find the high-quality information they need to better understand the topics they care about.

Google does not manipulate its Search results or modify any of its products to promote a political ideology. Our engineers have lots of different ideas for ways to make Search results more relevant to our users, and we rely on extensive testing and controls, and rigorous evaluation, to analyze metrics and decide whether to implement a proposed change. Results 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. In 2018, we ran over 654,680 experiments, with trained external Search Raters and live tests, resulting in more than 3,200 improvements to Search.

At no point in those evaluations is there any consideration given to the expected outcomes of a ranking change with regards to supporting or countering a specific candidate or ideology. We never personalize organic Search results content based on signals relating to point of view on issues and/or political leanings.

**14. Days after the Trump Administration instituted Executive Order, titled Protecting the Nation from Foreign Terrorist Entry into the United States, the Wall Street Journal reported that Google “employees proposed ways to ‘leverage’ search functions and take steps to counter what they considered to be ‘Islamophobic, algorithmically biased results for search terms “Islam”, “Muslim”, “Iran”, etc.’ and ‘prejudiced, algorithmically biased search results from search terms “Mexico”, “Hispanic”, “Latino”, etc.”**

- a. **Does Google have the capability to “leverage” search functions to counter what employees perceive to be prejudiced search results?**



- b. Did Google implement any employee’s suggestion to manipulate search results to achieve a desired political goal?**
- c. Were any of the employees who proposed manipulating Google search results managers, responsible in any way for any part of Google Search, or responsible for any type of content moderation outside of Google Search. If so, please state each individual’s position and job responsibilities at the time, as well as their current position and job responsibilities if the individual is still employed by Google.**
- d. Did Google discipline any of the employees who proposed manipulating search results to achieve desired political goals? If so, how many employees were disciplined and what disciplinary actions were taken?**
- e. Did Google provide any of the employees who proposed manipulating search results to achieve desired political goals with training specifically aimed at discouraging political, ideological, or partisan bias in decision-making by its employees? If so, provide the training materials and state how many employees completed this training.**

We build products for everyone. It is against both our policies and our mission to manipulate Search results or modify products to promote a particular political ideology. As we have stated publicly, these emails contained ideas of some of our employees, none of which were ever implemented. Google has many checks and balances in place before any change to Search can be implemented. We rely on extensive testing and controls, and rigorous evaluation, to analyze metrics and decide whether to implement a proposed change to Search.

**15. At the July 16 hearing, I read to you language from a leaked Google document entitled “The Good Censor” stating that Google and other tech firms “have gradually shifted away from unmediated free speech and towards censorship and moderation.” They have shifted from the “American tradition that prioritizes free speech for democracy” and towards a “European tradition that favors dignity over liberty, and civility over freedom” by “censoring” speech.**

- a. In response, you stated that this was one of many documents floating around Google and that it reflects work by a marketing team.
 
  - (1) Please provide any memoranda, internal communications, policy guidance, policies, or advice related to the creation and dissemination of this document, including any memoranda or communications regarding whether other portions of Google or its subsidiaries or affiliates reviewed, approved of, or disapproved of this document or these statements.**
  - (2) Does Google disavow the statement that it is moving away from “free speech” and towards “censorship and moderation”?**
  - (3) Does Google agree with the description in “The Good Censor” that large technology companies like Google and Facebook are moving****

away from “free speech” and towards “censorship and moderation”?

- b. When I asked you whether Google is in fact engaging in “censorship,” as Google’s own document says it is, you responded: “I would not say that we are censoring speech on our platforms.”
  - (1) Is Google censoring anything—speech or otherwise—on its platforms?
  - (2) Does Google consider the contents of webpages “speech?”
    - 1. If so, does Google consider the placement of a search within its search rankings influential on how many individuals will access a webpage, and thus that speech?
    - 2. Does Google consider its listing of results in response to a search inquiry to be speech?
  - (3) How does Google define censorship?
  - (4) Does a private entity that operates a platform ostensibly open to all individuals and ideas engage in censorship when it removes disfavored speech and bans those who engage in that disfavored speech from its platform?
  - (5) On what basis do you consider Google not engaged in censorship when Google bans, removes, down-ranks, down-rates, or demonetizes speech protected by the First Amendment but contrary to Google’s or YouTube’s policies or terms of service?

Google designs products that are for everyone, and we build our products and enforce our policies in a neutral way. To be clear, these were not official Google positions. This was a document prepared by an internal team, and was never applied to our products.

16. Google Search’s General Guidelines require human reviewers to provide a “Page Quality” rating for webpages. It is my understanding that, all else equal, in responding to a user query Google Search will prioritize, promote, or rank more highly webpages with higher Page Quality scores. This requires reviewers to examine and assess the webpage’s “Purpose;” “Expertise, Authoritativeness, [and] Trustworthiness;” “Main Content Quality and Amount;” and “Reputation,” as well as information regarding who created the webpage’s content.
- a. These guidelines explicitly require reviewers to discriminate among content. What does Google do to ensure that by reviewers tasked with content discrimination do not engage in viewpoint discrimination?
  - b. Has Google conducted, commissioned, or otherwise participated in any studies, reports, or analyses to determine whether “Page Quality” ratings are systematically biased against content with any particular religious, ideological, political, partisan, or philosophical viewpoint? If so, please list those studies below, state whether they were conducted by an

independent third-party, and include attach a copy of each study or report.

- c. Are users and website operators able to learn a webpage's "Page Quality?" If not, why not?
- d. List the "Page Quality" rating as of the date and time of receipt of this document for the homepages for the following news organizations:
  - (1) The Washington Post
  - (2) The New York Times
  - (3) The Washington Times
  - (4) The New York Post
  - (5) The New York Daily News
  - (6) Fox News
  - (7) National Review
  - (8) The Daily Beast
  - (9) Huffington Post
  - (10) BuzzFeed
  - (11) Newsweek
  - (12) The Daily Wire
  - (13) Vice
  - (14) USA Today
  - (15) Salon
  - (16) Slate
  - (17) Vox
  - (18) The Daily Caller
  - (19) The Blaze
  - (20) PJ Media
  - (21) The Washington Free Beacon
  - (22) The Washington Examiner
  - (23) Reuters
  - (24) The Associated Press
  - (25) National Public Radio
  - (26) Bloomberg
  - (27) Breitbart
  - (28) The Drudge Report
- e. List the "Page Quality" rating as of the date and time of receipt of this document for the homepages of the following organizations:
  - (1) National Right to Life Committee
  - (2) Susan B. Anthony List
  - (3) American Association of Pro-Life Obstetricians & Gynecologists
  - (4) Physicians for Life
  - (5) Americans United for Life
  - (6) Feminists for Life

- (7) Republican National Coalition for Life
- (8) Planned Parenthood
- (9) Center for Reproductive Rights
- (10) EMILY's List
- (11) NARAL
- (12) National Abortion Federation
- (13) National Coalition of Abortion Providers
- (14) National Organization for Women
- (15) National Rifle Association
- (16) Gun Owners of America
- (17) The Coalition to Stop Gun Violence
- (18) Everytown for Gun Safety
- (19) The Brady Campaign
- (20) Human Rights Campaign
- (21) Amnesty International
- (22) Lambda Legal
- (23) National Immigration Forum
- (24) Federation
- (25) GLAAD
- (26) ACLU
- (27) UnidosUS (formerly "La Raza" or the "National Council of La Raza")
- (28) The Sierra Club
- (29) Greenpeace
- (30) The Heritage Foundation
- (31) The Cato Institute
- (32) The Institute for Justice
- (33) Southern Poverty Law Center
- (34) Open Society Foundations
- (35) Americans for Prosperity

f. List the "Page Quality" rating as of the date of receipt of this document for the homepages of the following companies or products. If a product of company does not have a homepage, please choose an alternative page, state it clearly, and explain why that page was chosen:

- (1) Google Travel
- (2) Kayak
- (3) Travelocity
- (4) CheapOair
- (5) TripAdvisor
- (6) Priceline
- (7) Hotels.com
- (8) Google Careers
- (9) Indeed

- (10) CareerBuilder
- (11) Dice
- (12) Idealist
- (13) LinkedIn
- (14) Monster.com
- (15) Google Reviews
- (16) Yelp
- (17) Angie's List
- (18) Facebook Reviews
- (19) BBB for Business
- (20) Shopify Product Reviews
- (21) Google Shopping
- (22) Amazon

We work with external Search Quality Evaluators in the U.S. and abroad, and our vendors employ raters in all or most of the 50 states and in many countries around the world who assess and measure the quality of our Search results. We make our Search Quality Evaluator Guidelines publicly available at <https://static.googleusercontent.com/media/guidelines.raterhub.com/en//searchqualityevaluatorguidelines.pdf>. The ratings our Evaluators provide do not directly impact ranking, but help us benchmark the quality of our results so that we can continue to meet a high bar for Google Search users all around the world.

As discussed above, what results we return for a user is based on numerous factors, and our Search ranking systems are made up of not one, but a whole series of algorithms. To give users the most useful information, Search algorithms look at many factors, including the words of users' queries, the relevance and usability of pages, the expertise of sources, and the user's settings.

We conduct rigorous testing before we make any changes to Search, including conducting over half a million Search quality tests, described further at <https://www.google.com/search/howsearchworks/mission/users/>.

- 17. At a July 9, 2019 briefing for Senate Judiciary Committee Staffers, a Google representative stated that in producing results in response to a Google Search query, Google's algorithm must balance webpage relevance versus quality. Put differently, it must decide whether to prioritize more relevant but lesser quality webpages over less relevant but higher quality webpages.**
  - a. How does Google Search attempt to strike this balance?**
  - b. At this briefing, a Google representative stated that in the aftermath of events such as a mass shooting, Google Search will automatically and temporarily shift the balance to emphasize what it perceives to be quality results related to the event.**

- (1) Is this correct?
  - (2) In what other circumstances will Google rebalance its algorithm in response to current events?
- c. The Google representative justified this switch by stating that quality results are those that “do not spread misinformation.” In many contexts, what constitutes “misinformation” depends on certain value-laden assumptions or first principles. For example, whether one views a policy change that unintentionally but disparately affects a given community in a negative way relative to other communities as “discrimination” depends on whether one defines discrimination based on the intentions behind or effects of a given action; thus, whether a given political policy or executive action “discriminates against” a given community—and thus, whether statements to the contrary are “misinformation”—depends on that unstated assumption. That is why the First Amendment protects a marketplace of ideas for individuals to seek and determine truth through a robust debate that can address these unspoken assumptions. How does Google Search ensure that reviewer bias does not infect determinations as to what webpages spread misinformation? Furthermore, how does Google Search ensure that its determinations of “misinformation” do not depend on left-wing political assumptions?
- d. Would webpages expressing any of the following views be determined to be spreading “misinformation” on their own?
- (1) Climate change is not predominantly caused by human activity.
  - (2) There are only two sexes or two genders, male and female.
  - (3) There are no biological differences between men and women.
  - (4) There is no evidence of systematic bias against minorities in police shootings.
  - (5) Gun control does not tend to reduce violent crime.
  - (6) The wage-gap between women and men is small and almost entirely attributable to factors other than discrimination.
  - (7) Mass shootings are not more frequent now than in the past.
  - (8) Life begins at conception.

Search is designed to help users find useful and reliable information. As part of that, our ranking algorithms are designed to elevate the information that they determine is the most authoritative and trustworthy. These assessments may vary for each webpage on a website and are directly related to our users’ searches. For instance, a national news outlet’s articles might be deemed more authoritative in response to searches relating to current events, while its articles related to cooking and recipes may be rated as less authoritative. Our ranking system does not identify the intent or factual accuracy of any given piece of content. It is specifically designed, however, to identify sites with high indicia of expertise, authority, and trustworthiness. More information about how our algorithms and processes work can be found at <https://www.google.com/search/howsearchworks/algorithms/>.

In the case of breaking news events in particular, we have taken specific steps to try to reduce the introduction of unconfirmed or unreliable information. We often see misinformation introduced in early stages of these events. This sometimes occurs because of actors who may have malicious intent. In other cases, speculation can outrun facts as news outlets and officials on the ground are still investigating an incident. To address these issues, we have designed our systems to prefer authority over factors like recency or exact word matches while a crisis is developing. We made this change to reduce the potential to introduce incorrect or speculative information during these types of events, but it is not designed to take into account political viewpoint, such as those listed above.

**18. Google executives have repeatedly denied that Google Search deliberately “re-ranks” search results for political purposes.**

- a. Does this mean that any political bias in Google Search occurs organically?
- b. Does Google “whitelist” or “blacklist” any:
  - (1) Webpages, autocomplete terms, or sets of search results or terms from or about:
    1. The Republican National Committee?
    2. The Democratic National Committee?
    3. The National Republican Senate Committee?
    4. The Democratic Senatorial Campaign Committee?
    5. The National Republican Congressional Committee?
    6. The Democratic Congressional Campaign Committee?
    7. Any candidate for President in 2016?
    8. Any candidate for President in 2020?
    9. Donald Trump?
    10. Hillary Clinton?
      - a. Hillary Clinton’s emails?
      - b. Hillary Clinton’s FBI investigation?
    11. Joe Biden?
    12. Bernie Sanders?
    13. Elizabeth Warren?
  - (2) Materials, content, including uploaded content to YouTube or other Google-owned or affiliated subsidiaries or properties, regarding or from any of the above entities or individuals?
- c. Does any component of Google’s algorithm contribute to a statistically significant difference in page rankings regarding webpages discussing Republicans and Democrats?
- d. Does any component of Google’s algorithm contribute to a statistically significant difference in page rankings regarding webpages discussing political ideology depending on the content of that ideology?
- e.

Our business model depends on Google being a useful and trustworthy source of information. We build products that are for everyone, and we design and enforce our policies in a way that is free from improper personal bias. When users come to Google Search, our goal is to connect them with the most relevant and authoritative information as quickly as possible. That information can take many forms, and over the years, the Search results page has evolved to include not only a list of blue links to pages across the web, but also useful features to help users find what they are looking for even faster. This includes Knowledge Panels, which can help users find key facts about an individual or other topic in the world, and predictive features like Autocomplete that help users navigate Search more quickly. Because these features are highlighted in a unique way on the page, we have policies around what should and should not appear in those spaces, and we may correct information or remove those features from a page. For more details see: <https://www.blog.google/products/search/how-we-keep-google-search-relevant-and-useful/>.

**19. If the data demonstrated that Google’s products are biased against conservatives and that this bias has the power to swing elections by manipulating undecided voters:**

- a. Does Google have a responsibility to ensure that its ostensibly neutral products do not change the outcome of elections?
- b. If so, what is Google doing to fulfill that responsibility?

Google’s products are designed to help users organize and access information, and candidates and advocates across political spectrums regularly use our products for the specific purpose of educating and informing voters. Like all U.S. companies, we institute policies that we believe are in the best interest of our company, our shareholders, our users—and all Americans. For example, we have policies against hate speech and material that is excessively violent, unlawful, deceptive or obscene. We work to enforce these policies in a neutral way.

**20. Academic, peer-reviewed research demonstrates that Google Search’s autocomplete feature can strongly influence the queries that users submit, and, accordingly, the webpages that they visit.**

- a. Does Google agree that its autocomplete feature has the potential to manipulate users?
- b. Does Google track, document, record, archive, or otherwise preserve data on the autocomplete suggestions provided to users?
- c. Describe the step-by-step process used by the autocomplete algorithm to suggest search queries to users.
- d. Please provide any internal policies, directives, guidelines, or prohibitions that in any way contribute to the development and operation of the autocomplete algorithm.



Autocomplete is designed to help people complete a query they were intending to do, not to suggest new types of searches to be performed. These are our best predictions of the query a user was likely to continue entering. We look at the real searches that happen on Google and show common and trending queries relevant to the characters that are entered and also related to the user's previous searches. We process billions of searches per day, which in turn means we show many billions of predictions each day. Our systems aren't perfect, and inappropriate predictions can get through. When we're alerted to these, we strive to quickly remove them. Google removes predictions that are against our autocomplete policies, which you can learn more about at <https://support.google.com/websearch/answer/7368877>.

**21. There are multiple reports that Google quarantines numerous webpages, often because these sites contain malware. Reports suggest that, if a webpage is quarantined, Google Search will not display a link to that webpage in response to a relevant user query.**

**a. Yes or no: Does Google quarantine webpages?**

**If the answer is yes:**

- (1) What are the criteria for determining whether to quarantine a webpage?**
- (2) Is the decision to quarantine a webpage ever discretionary?**
- (3) Is the owner, operator, or manager of a quarantined webpage notified that the page is quarantined?**
- (4) Please list any and all reasons why a webpage may be quarantined, and attach any internal policies, directives, or guidelines relevant to quarantine decisions.**

**If the answer is no:**

- (1) How does the Google Search algorithm ensure that links to relevant webpages with malware are not provided to users?**

**b. At the July 16 hearing, you stated that Google does not maintain either "blacklists," or lists of webpages that a search query will not return, or "whitelists," lists of webpages that a given query must return. If Google quarantines webpages, please explain the difference between a list of quarantined webpages and a blacklist.**

As described above, there are narrow circumstances in which Google may remove Search results. We reserve the right to remove from Search results sites that exhibit deceptive or manipulative behavior designed to deceive users or game our Search algorithms, including through our Safe Browsing features. Google's Safe Browsing service examines billions of URLs and software, and content on those pages, in its effort to detect unsafe websites. And it warns users when they navigate to websites that could steal their personal information or install software designed to take over their computers. We document how we identify these websites at <https://transparencyreport.google.com/safe-browsing/overview>. And we have clear Webmaster guidelines that call out, for example, spammy behavior, available at <https://support.google.com/webmasters/answer/35769>, and we provide a clear process to

appeal removals once violations have been addressed, described at <https://support.google.com/webmasters/answer/35843>. We are transparent about these decisions, and discuss them further at <https://www.google.com/search/howsearchworks/mission/open-web/>.

**22. In March 2019, Google announced that it was establishing a council on the future of artificial intelligence. This council would study and advise Google on, among other things, “fairness in machine learning.” The eight-person council would have included one conservative, Kay Coles James, the president of the Heritage Foundation. But Google dissolved the council after over 2,500 Google employees signed a petition to have Ms. James removed from the council because she lacked a “perspective worthy of inclusion.”**

- a. At the July 16, 2019 hearing, you stated that Google dissolved the council not because of the petition, but because other members of the council were “fall[ing] off.”**
  - (1) Were you referring to Alessandro Acquisti, whose resignation was prompted by the outcry over the inclusion of Ms. James?**
  - (2) Were you referring to Luciano Floridi, who stated: “[i]f Ms. Coles James does not resign, as I hope she does, and if Google does not remove her . . . as I have personally recommended, the question becomes: what is the right moral stance to take in view of this grave error?”**
- b. The “heckler’s veto” is a term for censorship arising out of concerns that a given speaker’s opponents will respond to that speaker’s speech through overtly hostile, disruptive, and even violent means. When Google dissolved the council, it gave Ms. James’s opponents a heckler’s veto.**
  - (1) Before dissolving the council, did Google consider asking other individuals to join the council to replace the individuals who either resigned or communicated that they would not serve on the council with Ms. James?**
  - (2) Before dissolving the council, did Google consider asking any other individuals to join the council to replace Ms. James?**
    - 1. If so, who did Google consider as a potential replacement for Ms. James?**
    - 2. If so, did Google seek specifically to replace Ms. James with a conservative representative?**
- c. Question 13 referenced a potential Google policy in which employees are expected to “intervene for fairness” in algorithms. Was this algorithmic “fairness” a topic on which the council would have advised Google?**

Addressing fairness and inclusion in artificial intelligence (AI) is an active area of research. As we publicly discuss in our website on AI, available at <https://ai.google/responsibilities/responsible-ai-practices/>, we believe it is critical to work on addressing fairness in algorithms

and have undertaken a number of initiatives to do so, including fostering an inclusive workforce that embodies critical and diverse knowledge.

The goal of AI Council was to engage voices outside of Google to receive feedback on our work. Unfortunately, the resignations or threats of resignations by individuals made it clear that in the current environment, the Council could not function as we wanted. We are committed, however, to continue to be responsible in our work on the important issues that AI raises, and will find different ways of getting outside opinions on these topics.

**23. At the July 16, 2019 hearing, I discussed with you a leaked email from Google employee Liam Hopkins sent on March 18 of an unknown year stating: “Prager U, Jordan Peterson, Ben Shapiro et al are all Nazi[s]” using “dog whistles.” Mr. Hopkins further stated that Google should isolate this “far-right” content and not suggest it to users.**

- a. **At the time Mr. Hopkins wrote that email, did sending such an email violate any internal Google policies? If so, please provide a copy of each such policy, including the dates during which it was in effect.**
- b. **Regardless of whether it violated a policy at the time, would an identical email sent by another employee currently violate any of Google’s internal policies? If so, please provide a copy of each such policy, including the date on which it was enacted.**
- c. **At the time Mr. Hopkins wrote that email, what was his position at Google, what were his chief responsibilities, and did he have any responsibility, either direct or indirect, for content moderation or algorithms that engage in content moderation?**
- d. **This email appears to have been sent to at least 17 other Google employees.**
  - (1) **Please name these employees and state their position, their chief responsibilities, and whether they had any responsibility, either direct or indirect, for content moderation or algorithms that engage in content moderation at the time they received Mr. Hopkins’s email.**
  - (2) **Did any of these employees report Mr. Hopkins’s email to human resources, a supervisor, or any other appropriate authority?**
  - (3) **Did any of these employees reply or in any other documented way respond to Mr. Hopkins email? If so, please attach their response.**
- e. **As of the date of your receipt of these questions for the record, has Google opened an investigation into Mr. Hopkins’s actions? If not, why not?**
- f. **Did Mr. Hopkins face disciplinary action for writing this email slandering two Orthodox Jews as Nazis and encouraging Google to censor their speech? If so, what was the disciplinary action and when did it occur?**

As I said in my testimony, the statement made by this individual does not reflect the views of Google. As this matter relates to a specific employee and any disciplinary actions we may or may not take, we cannot comment on it further.

- 24. Does Google—in any of its properties or products, or through any of its subsidiaries or affiliates—moderate, prohibit, ban, or in any way otherwise restrict or make less accessible content it considers to be “hate speech?” This question includes proposed and actual advertisements. (If the answers to this question or its sub-parts differ for Google’s various properties, products, subsidiaries, and affiliates, please provide separate answers for each.)**
- a. How does Google define the term “hate speech?”**
    - a. How does specifically YouTube define the term “hate speech?”**
    - b. To what extent is YouTube’s definition of “harassment” contained within the term “hate speech?”**
    - c. To what extent is YouTube’s definition of “hate speech” contained within its definition of “harassment?”**
  - b. What objective metrics, if any, does Google use to determine whether a webpage, affiliate, advertisement, or product contains or uses “hate speech?”**
  - c. To what extent does whether a statement constitutes “hate speech” depend on the subjective judgment of the individual or individuals reviewing the statement?**
  - d. What training, if any, does Google provide to reviewers tasked with determining whether a statement is “hate speech” in order to ensure that they do not discriminate on the basis of viewpoint or partisan affiliation?**
  - e. For purposes of Google Search, has Google ever changed its definition of “hate speech” or how it applies its hate speech policies? If so, please describe those changes.**
  - f. Has YouTube ever changed its definition of “hate speech” or how it applies its hate speech policies? If so, please describe those changes.**
  - g. For purposes of Google Search, does Google down-rank—including indirect down-ranking by imposing lower webpage quality ratings or lower webpage relevance ratings—webpages based on content that Google currently regards as “hate speech” but would not have regarded as “hate speech” at some previous time?**

We operate in 190 countries, and hate speech laws vary by country. We respect the law as required in each country, and will block illegal hate speech content to comply with local laws. We also enforce our Community Guidelines globally. Our hate speech policy prohibits content promoting violence or hatred against individuals or groups based on age, caste, disability ethnicity, gender identity, nationality, race, immigration status, religion, sex/gender, sexual orientation, victims of a major violent event and their kin, and veteran status.

YouTube also has a policy that prohibits harassment and cyberbullying. Content or behavior intended to maliciously harass, threaten, or bully others is not allowed on YouTube. We make our Guidelines publicly available, including providing examples and online training deep-dives to further explain our policies at <https://creatoracademy.youtube.com/page/course/community-guidelines>. We work hard to maintain a safe community, invest heavily in our enforcement program that relies on both human reviewers and technology, and respond to flags of inappropriate content from automated flagging systems, members of the Trusted Flagger program (NGOs, government agencies, and individuals) or from users in the broader YouTube community. We publish a report that provides data on the flags YouTube receives and how we enforce our policies, available at <https://transparencyreport.google.com/youtube-policy/removals>.

Our Google News content policies include a prohibition against “content that promotes violence or harassment against an individual or group based on ethnic origin, religion, disability, gender, age, veteran status, sexual orientation or gender identity.” Sites that we find to contain such content may be excluded from our Google News corpus, and the effect of that may be that content from the site in question does not appear as often in Search features such as Top Stories, which emphasize fresh and newsworthy content.

**25. Did or does Google Search collaborate with or defer to any outside individuals or organizations in determining whether to classify a particular statement as “hate speech?” If so, please list the individuals and organizations.**

In some countries outside the United States where hate speech is unlawful, Google may discuss particular legal removal requests with outside counsel or other experts to help us navigate our legal obligations under local law.

**26. Did or does Google Search collaborate with or defer to any outside individuals or organizations in determining whether a given speaker has committed acts of “hate speech” in the past? If so, please list the individuals and organizations.**

- a. **Does Google Search review these groups’ internal procedures in determining whether an entity is a “hate group” or committing acts of “hate speech” to determine that these determinations are not made on a partisan basis?**
- b. **Did or does Google Search collaborate with or defer to any outside individuals or organizations in determining whether a given speaker has committed acts of “hate speech” in the past? If so, please list the individuals and organizations.**

As we explain above, in some countries outside the United States where hate speech is unlawful, Google may discuss particular legal removal requests with outside counsel or other experts to help us navigate our legal obligations under local law.

- 27. In your answer to Senator Hawley at the July 16 hearing, you repeatedly stated that Google has no plans to enter the Chinese “search” market. Search is only one area of Google, and Alphabet’s, business.**
- a. Is Google or Alphabet entering the Chinese market in any business lines outside of the narrow definition of “search”?**
  - b. Is Google working with the Chinese government, or any Chinese business where the Chinese government might have an interest, to provide cloud, advertising, data, tracking, monitoring or other services?**
  - c. Has Google formed any formal or informal internal exploratory, marketing, or development groups to evaluate, plan, explore, or prepare for Google’s entrance into the Chinese market or any subset of that market?**

We take a very cautious approach in China, and our presence there is carefully scoped. Unlike several of our peers, our core services remain blocked in China, and our business there is focused on selling ads and working on open-source platforms.

- 28. Google has the ability to censor political candidates and organizations seeking to influence public opinion by refusing to accept, service, or place their advertisements in the Google ecosystem.**
- a. Since 2010, how many advertisements from Republican candidates for federal public office or for the Governorship of a State has Google refused to accept, service, or place? For each instance, name the candidate, the year, and the office sought.**
  - b. Since 2010, how many advertisements from Democratic candidates for federal public office or for the Governorship of a State has Google refused to accept, service, or place? For each instance, name the candidate, the year, and the office sought.**
  - c. Since 2010, how many advertisements from Republican candidates for federal public office or for the Governorship of a State has Google threatened not to accept, service, or place unless the candidate altered the content of the of the advertisement? For each instance, name the candidate, the year, and the office sought.**
  - d. Since 2010, how many advertisements from Democratic candidates for federal public office or for the Governorship of a State has Google threatened not to accept, service, or place unless the candidate altered the content of the of the advertisement? For each instance, name the candidate, the year, and the office sought.**
  - e. Since 2010, how many advertisements from each of the following organizations has Google refused to accept, service, or place or threatened not to accept, service, or place unless the advertiser altered the content of the advertisement? If any of the organizations has never placed an advertisement with Google, please indicate that.**

- (1) National Right to Life Committee
  - (2) Susan B. Anthony List
  - (3) American Association of Pro-Life Obstetricians & Gynecologists
  - (4) Physicians for Life
  - (5) Americans United for Life
  - (6) Feminists for Life
  - (7) Republican National Coalition for Life
- f. Since 2010, how many advertisements from each of the following organizations has Google refused to accept, service, or place or threatened not to accept, service, or place unless the advertiser altered the content of the advertisement? If any of the organizations has never placed an advertisement with Google, please indicate that.
- (1) Planned Parenthood
  - (2) Center for Reproductive Rights
  - (3) Emily's List
  - (4) NARAL Pro-Choice America
  - (5) National Abortion Federation
  - (6) National Coalition of Abortion Providers
  - (7) National Organization for Women
- g. Since 2010, how many advertisements from each of the following organizations has Google refused to accept, service, or place or threatened not to accept, service, or place unless the advertiser altered the content of the advertisement? If any of the organizations has never placed an advertisement with Google, please indicate that
- (1) American Israel Public Affairs Committee
  - (2) Israel On Campus Coalition
  - (3) American Freedom Defense Initiative
  - (4) StandWithUs
- h. Since 2010, how many advertisements from each of the following organizations has Google refused to accept, service, or place or threatened not to accept, service, or place unless the advertiser altered the content of the advertisement? If any of the organizations has never placed an advertisement with Google, please indicate that.
- (1) BDS Movement
  - (2) American Friends of the Middle East
  - (3) American-Arab Anti-Discrimination Committee
  - (4) Counsel for the National Interest

Our products are built for everyone, and we design them with extraordinary care to be a trustworthy source of information for everyone, without regard to political viewpoint. Our policies are designed to protect users and ensure that advertisers are using our platforms in a responsible manner. If we were to refuse to accept ads from an advertiser, that decision would be based on our advertiser guidelines, which are applied without bias based on political

affiliation. Our advertising policies prohibit, for example, counterfeit goods and dangerous products, like recreational drugs. We also prohibit content that promotes hatred, intolerance, discrimination, or violence. More information about our policies are available at <https://support.google.com/adspolicy/answer/6008942>.

**29. Please provide specific numerical answers to the following questions. If you believe that any disparity in the rates charged to candidates is partially or wholly attributable to politically-neutral factors, including but not limited to geographic concerns, local-market concerns, or timing, you may explain how and to what extent that factor explains the disparity and include calculations justifying that explanation.**

**On average by advertisement type (e.g., banner ad, autoplay video, etc.), and among campaigns that purchased advertisements, what rates did Google charge, or is Google charging:**

- a. Donald Trump's Campaign in the 2020 general election?
- b. Joe Biden's Campaign in the 2020 primary election?
- c. Bernie Sanders's Campaign in the 2020 primary election?
- d. Elizabeth Warren's Campaign in the 2020 primary election?
- e. Kamala Harris's Campaign in the 2020 primary election?
- f. Donald Trump's Campaign in the 2016 general election?
- g. Hillary Clinton's Campaign in the 2016 general election?
- h. Mitt Romney's Campaign in the 2012 general election?
- i. Barack Obama's Campaign in the 2012 general election?
- j. John McCain's Campaign in the 2008 general election?
- k. Barack Obama's Campaign in the 2008 general election?
- l. Democrats running for Senate in 2008?
- m. Republicans running for Senate in 2008?
- n. Democrats running for the House of Representatives in 2008?
- o. Republicans running for the House of Representatives in 2008?
- p. Democrats running for Governor in 2008?
- q. Republicans running for Governor in 2008?
- r. Democrats running in State or local legislative races in 2008?
- s. Republicans running in State or local legislative races in 2008?
- t. Democrats running for Senate in 2010?
- u. Republicans running for Senate in 2010?
- v. Democrats running for the House of Representatives in 2010?
- w. Republicans running for the House of Representatives in 2010?
- x. Democrats running for Governor in 2010?
- y. Republicans running for Governor in 2010?
- z. Democrats running in State or local legislative races in 2010?
- aa. Republicans running in State or local legislative races in 2010?



- bb. Democrats running for Senate in 2012?
- cc. Republicans running for Senate in 2012?
- dd. Democrats running for the House of Representatives in 2012?
- ee. Republicans running for the House of Representatives in 2012?
- ff. Democrats running for Governor in 2012?
- gg. Republicans running for Governor in 2012?
- hh. Democrats running in State or local legislative races in 2014?
- ii. Republicans running in State or local legislative races in 2014?
- jj. Democrats running for Senate in 2014?
- kk. Republicans running for Senate in 2014?
- ll. Democrats running for the House of Representatives in 2014?
- mm. Republicans running for the House of Representatives in 2014?
- nn. Democrats running for Governor in 2014?
- oo. Republicans running for Governor in 2014?
- pp. Democrats running in State or local legislative races in 2014?
- qq. Republicans running in State or local legislative races in 2014?
- rr. Democrats running in State or local legislative races in 2016?
- ss. Republicans running in State or local legislative races in 2016?
- tt. Democrats running for Senate in 2016?
- uu. Republicans running for Senate in 2016?
- vv. Democrats running for the House of Representatives in 2016?
- ww. Republicans running for the House of Representatives in 2016?
- xx. Democrats running for Governor in 2016?
- yy. Republicans running for Governor in 2016?
- zz. Democrats running in State or local legislative races in 2016?
- aaa. Republicans running in State or local legislative races in 2016?
- bbb. Democrats running in State or local legislative races in 2018?
- ccc. Republicans running in State or local legislative races in 2018?
- ddd. Democrats running for Senate in 2018?
- eee. Republicans running for Senate in 2018?
- fff. Democrats running for the House of Representatives in 2018?
- ggg. Republicans running for the House of Representatives in 2018?
- hhh. Democrats running for Governor in 2018?
- iii. Republicans running for Governor in 2018?
- jjj. Democrats running in State or local legislative races in 2018?
- kkk. Republicans running in State or local legislative races in 2018?

We are always working to provide greater transparency about our products, including regarding political advertising on Google, YouTube, and partner properties. Starting last year, we began publishing a report with information about spending on ads featuring a current elected federal officeholder or candidate for the U.S. House of Representatives, U.S. Senate, President, or Vice President. The report is available at <https://transparencyreport.google.com/political-ads/region/US>.

Google's ad pricing does not take into consideration the political affiliation of advertisers. Google Ads is an auction. Advertisers may, for example, bid for opportunities to show their ads on Google Search results pages. Depending on the choices made by the advertisers, a bid may represent the maximum amount the advertiser says it is willing to pay for a click on its ads. In such a scenario, the amount any particular advertiser pays for a click depends on a number of factors, such as the day of the week or time of day. We do not, however, change pricing for ads based on a candidate's identity or party.

- 30. Yes or no: does Google either directly or indirectly through its algorithms consider in any way partisan affiliation in deciding whether to sell advertisements to a political candidate, political action committee, or other organization purchasing political advertisements?**
- 31. Yes or no: does Google either directly or indirectly through its algorithms consider in any way partisan affiliation in deciding at what rates to sell advertisements to a political candidate, political action committee, or other organization purchasing political advertisements?**
- 32. Yes or no: does Google either directly or indirectly through its algorithms consider in any way the likelihood of a candidate's ultimate electoral success (via polls or otherwise) in deciding whether to sell advertisements to a political candidate?**
- 33. Yes or no: does Google either directly or indirectly through its algorithms consider in any way the likelihood of a candidate's ultimate electoral success (via polls or otherwise) in deciding at what rates to sell advertisements to a political candidate?**

We answer questions 30-33 here together. Google does not take any of these factors into consideration. We do not take partisan affiliation or the likelihood of electoral success into account in deciding whether to sell ads or at what rates.

- 34. Yes or no: has Google ever provided at no, nominal, or greatly discounted cost advertising to political candidates, campaign committees, political action committees or similar groups, or issue-advocacy groups or campaigns, whether through outright advertising or by altering search rankings, page positioning, suggestion features, or other any other feature for which advertisers typically pay a fee?**
  - a. If so, please provide each instance in which Google has done so and indicate whether Google offered similar support to any other candidate or issue in that race or election.**

- b. **If so, please indicate whether Google coordinated with that campaign, candidate, or issue in doing so, or if Google acted unilaterally.**
- c. **Does Google report to the Federal Election Commission when it carries advertisements for candidates or issues at a discounted rate?**
- d. **Does Google report to the Federal Election Commission when it issues discounts to or free advertisements for a federal political campaign or candidate?**
- e. **Does Google report to the Federal Election Commission when it discovers that it is charging different candidates for the same election different amounts for exposure to the same demographics or geographic areas?**
- f. **Does Google acknowledge that the issuance of free or heavily discounted advertising to a political candidate or campaign would be an “in-kind” donation for purposes of federal or California state election laws?**

Candidates, campaigns, and other types of political spenders are treated the same as other similarly situated advertisers, and have access to the same rates and discounts as any other advertiser. We do not take into consideration these factors in our advertising products. Like we do with any other advertiser, we will occasionally issue courtesy credits to political advertisers when either an advertiser or Google error results in unintended ad spend. These credits are consistent with how all advertisers are treated on our platforms.

**35. Approximately two months before the Irish referendum to legalize abortion, Irish media reported that pro-life groups were expected to spend three times more to advocate for their position than the opposition. Then, two weeks before the election, Google announced it would not accept any referendum related advertisements.**

- a. **When did Google internally decide to adopt this policy?**
- b. **When Google announced this policy, was it aware that it would disproportionately affect pro-life groups advocating against the proposition? If not, why did Google fail to consider how its policy would affect a national referendum on a controversial issue?**
- c. **Has Google refused to accept all advertisements related to any other election or referendum other except as required by law? If so, list the elections or referenda.**
- d. **When Google implements a new policy applicable to elections or referendums, does it typically consider the anticipated effect of the new policy?**

We take election integrity extremely seriously and our teams adopt increased vigilance across our products and platforms in the lead-up to votes such as the referendum in Ireland in 2018. This is to ensure that advertisers are complying with our policies and to ensure that we are alerted to any advertising that potentially conflicts with local law.

While we did not see any illegal activity on our platforms in the Irish referendum, we did see an increase in the amount of foreign spend closer to polling day, and concluded that the level of foreign spend gave rise to genuine public concern and showed the gap between public expectations and the law, which dated to a time prior to the advent of digital advertising.

Taking everything into account, we determined that a pause of all referendum ads was the most prudent response to these public concerns. This pause obviously applied to all sides advertising in the referendum and our Search tools were still available to help users find relevant information on the referendum or any other issue.

- 36. In May 2019, Google declared that the Claremont Institute’s campaign to warn about the dangers of multiculturalism, identity politics, and politically correct speech violated Google’s policy on “race and ethnicity in personalized advertising.” This barred the Institute from advertising to their own readers about an upcoming Institute event. Google originally adhered to the ban without explanation. It was only after the Institute pleaded its case to the public that Google backed down, claiming they made a “mistake.”**
- a. Did any Google employees involved in the process of deciding whether to bar the Institute’s advertisement maintain that the advertisement violated Google’s policies?**
  - b. To the extent that the Institute’s advertisement was banned because Google employees misunderstood how to apply Google’s policies, what steps has Google taken to ensure that a similar “mistake” does not occur again?**

To protect users, Google prohibits advertisers from targeting personalized ads based on sensitive categories like race or ethnicity. This is because we want ads to reflect a user’s interests rather than more personal interpretations of their fundamental identity.

The American Mind publication was incorrectly flagged as trying to run such ads. As we have previously acknowledged, this was a mistake. When the issue came to our attention, we re-reviewed the ad, and it was allowed to run, approximately 10 days after the restriction was first placed on the ad. We are always reviewing our practices and policies to improve them.

- 37. Does Google prohibit, ban, or otherwise restrict or make less accessible advertisements that it considers to be “hate speech,” whether or not it sold those advertisements?**
- a. For purposes of reviewing the content of advertisements, how does Google define the term “hate speech?”**
  - b. For purposes of reviewing the content of advertisements, what objective metrics, if any, does Google use to determine whether an advertisement contains “hate speech?”**

- c. **To what extent does a determination that an advertisement contains “hate speech” depend on the subjective judgment of the individual or individuals reviewing the advertisement?**
- d. **What training, if any, does Google provide to reviewers tasked with determining whether an advertisement contains “hate speech” in order to ensure that they do not discriminate on the basis of viewpoint or partisan affiliation?**
- e. **For purposes of reviewing the content of advertisements, has Google ever changed its definition of “hate speech” or how it applies its hate speech policies? If so, please describe those changes.**
- f. **Does Google prohibit any advertisements as containing “hate speech” that it would not have regarded as containing “hate speech” at some previous time?**

Google does not allow ads or destinations that display shocking content or promote hatred, intolerance, discrimination, or violence. Google does not allow content that incites hatred of, promotes discrimination against, or disparages an individual or group on the basis of their race or ethnic origin, religion, disability, age, nationality, veteran status, sexual orientation, gender, gender identity, or other characteristic that is associated with systemic discrimination or marginalization. Examples include content promoting hate groups or hate group paraphernalia and content that encourages others to believe that a person or group is inhuman, inferior, or worthy of being hated.

Google uses a combination of automation and human reviewers to evaluate compliance with our Ads policies. We work hard to enforce these policies vigorously, consistently, and without any political bias. We regularly and routinely review ads on our platform to ensure compliance with our policies. In 2018, we took down approximately 190,000 ads for violating our Dangerous or Derogatory content policy.

In May 2017, Google updated its Inappropriate Content policy to include Dangerous or Derogatory content. This update made clear that Google prohibits content that (1) harasses, exploits, or disparages an individual or group, or (2) promotes hatred, intolerance, violence, or discrimination against an individual or group. This update replaced and incorporated previous policies on intolerance, harassment and exploitation, and physical harm.

**38. Does Google prohibit, ban, or otherwise restrict the ability of publishers to serve Google advertisements based on the lawful content of their websites?**

- a. **If Google prohibits publishers that employ “hate speech” from serving Google advertisements, how does Google define the term “hate speech”?**
- b. **What objective metrics, if any, does Google use to determine whether a publisher’s lawful content prohibits, bans, or otherwise restricts that publisher’s ability to serve Google advertisements?**

- c. To what extent does a determination that a publisher’s webpage contains lawful content that prohibits, bans, or otherwise restricts the publisher’s ability to serve Google advertisements depend on the subjective judgment of the individual or individuals reviewing that publisher’s webpage and content?**
- d. What training, if any, does Google provide to reviewers tasked with determining whether a publisher’s webpage contains lawful content that prohibits, bans, or otherwise restricts the publisher’s ability to serve Google advertisements in order to ensure that they do not discriminate on the basis of viewpoint or partisan affiliation?**

Google helps to enable a free and open web by helping publishers monetize their content and advertisers reach prospective customers with useful, relevant products and services. Maintaining trust in the ads ecosystem requires setting limits on what we will monetize. In order to protect advertisers from having their ads served against inappropriate content, Google requires that publishers adhere to our Google Publisher Policies.

Google prohibits publishers from placing advertisements against content that violates our policy on “Dangerous or derogatory content.” This policy includes content that incites hatred of, promotes discrimination against, or disparages an individual or group on the basis of their race or ethnic origin, religion, disability, age, nationality, veteran status, sexual orientation, gender, gender identity, or other characteristic that is associated with systemic discrimination or marginalization.

Google’s Trust and Safety team reviews publisher content in accordance with our policies to determine whether to restrict advertising from that content. We use both automated processes and manual review to identify content on sites and apps that may violate Google’s policies. Google reviewers go through regular training and training refreshes. In addition, reviewers are regularly tested and graded both for objectivity and for being consistent with Google’s policies. Finally, Google employs review teams across many offices globally, to ensure that there is a diverse set of reviewers who are reviewing publisher sites and apps.

**39. Did or do any of Google’s advertising services or product teams collaborate with or take input from any outside individuals or organizations in determining whether to classify a particular advertisement or webpage as “hate speech?” If so, please list the individuals and organizations and the dates during which Google, its advertising services, or product teams did so.**

- a. Does or do any of Google’s advertising services or product teams review these groups’ internal procedures in determining whether an entity is a “hate group” or committing acts of “hate speech” to determine that these determinations are not made on a partisan basis?**

**b. Does Google acknowledge that the Southern Poverty Law Center sometimes uses its determinations regarding whether a group is a “hate group” for Democratic partisan political advantage?**

Our Trust and Safety team conducts reviews for compliance in accordance with our own policies. We do not defer to the judgment of external individuals or organizations. Google does not have insight into the methodology the Southern Poverty Law Center uses to make its determinations.

**40. Since January 2016, has Google removed any publishers from its AdSense network? If so, identify each such publisher and the date on which that publisher was removed.**

Google takes enforcement of our publisher policies seriously and removes publishers from our advertising network when it believes they represent a threat to the advertising ecosystem. In 2018 alone, we terminated approximately 734,000 publishers from our ad network. Similarly, in 2017, we terminated approximately 320,000 publishers.

**41. What are Google’s total advertising revenues for each of the calendar years 1998 to 2018, inclusive?**

Our advertising revenue is disclosed on a quarterly basis in our 10-Ks and 10-Qs, along with a detailed description of our advertising products. Recent filings are available at <https://abc.xyz/investor/>, and more historical filings are available on the SEC’s Edgar website: <https://www.sec.gov/cgi-bin/browse-edgar?action=getcompany&CIK=0001288776> and <https://www.sec.gov/cgi-bin/browse-edgar?action=getcompany&CIK=0001652044>. Revenue information from prior to Google becoming public was disclosed in our S-1, also available on Edgar.

Total advertising revenue (in millions, unless otherwise stated) for the years 2001-2019<sup>2</sup> and total revenue (in thousands) for the years 1999-2000:

<b>Year</b>	<b>Revenue</b>	<b>Source</b>
2018	\$116,318	<a href="https://abc.xyz/investor/static/pdf/20180204_alphabet_10K.pdf?cache=11336e3">https://abc.xyz/investor/static/pdf/20180204_alphabet_10K.pdf?cache=11336e3</a>
2017	\$95,375	<a href="https://www.sec.gov/Archives/edgar/data/1652044/000165204418000007/goog10-kq42017.htm">https://www.sec.gov/Archives/edgar/data/1652044/000165204418000007/goog10-kq42017.htm</a>
2016	\$79,383	<a href="https://www.sec.gov/Archives/edgar/data/1652044/000165204416000007/goog10-kq42016.htm">https://www.sec.gov/Archives/edgar/data/1652044/000165204416000007/goog10-kq42016.htm</a>

<sup>2</sup> Total advertising revenue was readjusted in subsequent 10-K filings for several years. The above numbers reflect the readjustments in subsequent 10-Ks.

		<a href="https://www.sec.gov/Archives/edgar/data/4417000008/goog10-kq42016.htm">4417000008/goog10-kq42016.htm</a>
2015	\$67,390	<a href="https://www.sec.gov/Archives/edgar/data/1288776/000165204416000012/goog10-k2015.htm">https://www.sec.gov/Archives/edgar/data/1288776/000165204416000012/goog10-k2015.htm</a>
2014	\$59,624	<a href="https://www.sec.gov/Archives/edgar/data/1288776/000165204416000012/goog10-k2015.htm">https://www.sec.gov/Archives/edgar/data/1288776/000165204416000012/goog10-k2015.htm</a>
2013	\$51,072	<a href="https://www.sec.gov/Archives/edgar/data/1288776/000165204416000012/goog10-k2015.htm">https://www.sec.gov/Archives/edgar/data/1288776/000165204416000012/goog10-k2015.htm</a>
2012	\$43,686	<a href="https://www.sec.gov/Archives/edgar/data/1288776/000119312513028362/d452134d10k.htm">https://www.sec.gov/Archives/edgar/data/1288776/000119312513028362/d452134d10k.htm</a>
2011	\$36,531	<a href="https://www.sec.gov/Archives/edgar/data/1288776/000119312512025336/d260164d10k.htm">https://www.sec.gov/Archives/edgar/data/1288776/000119312512025336/d260164d10k.htm</a>
2010	\$28,236	<a href="https://www.sec.gov/Archives/edgar/data/1288776/000119312511032930/d10k.htm">https://www.sec.gov/Archives/edgar/data/1288776/000119312511032930/d10k.htm</a>
2009	\$22,888.8	<a href="https://www.sec.gov/Archives/edgar/data/1288776/000119312510030774/d10k.htm">https://www.sec.gov/Archives/edgar/data/1288776/000119312510030774/d10k.htm</a>
2008	\$21,128.5	<a href="https://www.sec.gov/Archives/edgar/data/1288776/000119312509029448/d10k.htm">https://www.sec.gov/Archives/edgar/data/1288776/000119312509029448/d10k.htm</a>
2007	\$16,412.6	<a href="https://www.sec.gov/Archives/edgar/data/1288776/000119312508032690/d10k.htm">https://www.sec.gov/Archives/edgar/data/1288776/000119312508032690/d10k.htm</a>
2006	\$10,492.6	<a href="https://www.sec.gov/Archives/edgar/data/1288776/000119312507044494/d10k.htm">https://www.sec.gov/Archives/edgar/data/1288776/000119312507044494/d10k.htm</a>
2005	\$6,065	<a href="https://www.sec.gov/Archives/edgar/data/1288776/000119312506056598/d10k.htm">https://www.sec.gov/Archives/edgar/data/1288776/000119312506056598/d10k.htm</a>
2004	\$3,143	<a href="https://www.sec.gov/Archives/edgar/data/1288776/000119312505065298/d10k.htm">https://www.sec.gov/Archives/edgar/data/1288776/000119312505065298/d10k.htm</a>
2003	\$1,420	<a href="https://www.sec.gov/Archives/edgar/data/1288776/000119312504202434/ds1a.htm">https://www.sec.gov/Archives/edgar/data/1288776/000119312504202434/ds1a.htm</a>
2002	\$410.915	<a href="https://www.sec.gov/Archives/edgar/data/1288776/000119312504202434/ds1a.htm">https://www.sec.gov/Archives/edgar/data/1288776/000119312504202434/ds1a.htm</a>
2001	\$66.932	<a href="https://www.sec.gov/Archives/edgar/data/1288776/000119312504202434/ds1a.htm">https://www.sec.gov/Archives/edgar/data/1288776/000119312504202434/ds1a.htm</a>



2000	\$19.108* (*total revenue)	<a href="https://www.sec.gov/Archives/edgar/data/1288776/000119312504202434/ds1a.htm#toc86708_7">https://www.sec.gov/Archives/edgar/data/1288776/000119312504202434/ds1a.htm#toc86708_7</a>
1999	\$220** (**total revenue, in thousands)	<a href="https://www.sec.gov/Archives/edgar/data/1288776/000119312504202434/ds1a.htm#toc86708_7">https://www.sec.gov/Archives/edgar/data/1288776/000119312504202434/ds1a.htm#toc86708_7</a>

**42. What is Google’s total advertising revenue for each month of the calendar year 2019 to date?**

Like most companies, we publicly report our revenue on a quarterly basis. Recent filings are available at <https://abc.xyz/investor/>.

The following table summarizes quarterly Google advertising revenue (in millions, unaudited):

Quarter	Revenue	Source
Q1 2019 (3 months ending March 31, 2019)	\$30,720	<a href="https://abc.xyz/investor/static/pdf/20190429_alphabet_10Q.pdf">https://abc.xyz/investor/static/pdf/20190429_alphabet_10Q.pdf</a>
Q2 2019 (3 months ending June 30, 2019)	\$32,601	<a href="https://abc.xyz/investor/static/pdf/20190725_alphabet_10Q.pdf">https://abc.xyz/investor/static/pdf/20190725_alphabet_10Q.pdf</a>
Q3 2019 (3 months ending September 30, 2019)	\$33,916	<a href="https://abc.xyz/investor/static/pdf/20191028_alphabet_10Q.pdf">https://abc.xyz/investor/static/pdf/20191028_alphabet_10Q.pdf</a>

**43. What are the costs and revenues associated with each level of Google’s advertising suite (e.g., DoubleClick for Publishers, which is now part of Google Ad Manager)?**

- a. If you cannot state the costs and revenues, please state whether any level of the advertising suite provides services at prices below the cost of provision.

- b. Does Google provide any advertising services at an introductory rate below the cost it requires Google to provide those services?
- c. Does Google provide any advertising services at a permanent rate below the cost it requires Google to provide those services?

Our advertising revenue is disclosed on a quarterly basis in our 10-Ks and 10-Qs, along with details regarding our products and their performance, including the performance of our Google Network Members' properties (which include AdMob, AdSense, and Google Ad Manager). Recent filings are available at <https://abc.xyz/investor/>.

The following table, from our Q3 2019 10-Q ([https://abc.xyz/investor/static/pdf/20191028\\_alphabet\\_10Q.pdf](https://abc.xyz/investor/static/pdf/20191028_alphabet_10Q.pdf)), presents our Google Network Members' properties revenues (in millions, unaudited) and changes in our impressions and cost-per-impression (expressed as a percentage):

	Three Months Ended September 30,		Nine Months Ended September 30,	
	2018	2019	2018	2019
Google Network Members' properties revenues	\$ 4,900	\$ 5,269	\$ 14,369	\$ 15,573
Google Network Members' properties revenues as a percentage of Google segment revenues	14.6%	13.1 %	14.8%	13.5 %
Impressions change		12 %		9 %
Cost-per-impression change		(3)%		(1)%

We do provide advertising services at discounted rates. For example, we're a founding member of the Center for Safe Internet Pharmacies (CSIP), a nonprofit organization committed to raising public awareness about the dangers associated with illicit online pharmacies, such as identify theft and counterfeit medications. For years, we've sponsored CSIP's online ads leading to their consumer education website, [www.verifybeforeyoubuy.com](http://www.verifybeforeyoubuy.com), to raise awareness to those shopping online for medications at the point at which they are most vulnerable to exploitation by criminals peddling fake pharmaceuticals. We're proud of this work, and other efforts we've undertaken to provide free and discounted ads to important public interest projects.

**44. One opinion piece in Forbes stated that Google requires exclusive agreements with potential advertisers and prevents cross-platform interoperability regarding advertisements. It also states that “[p]ublishers are barred from using third-party tools to manage their data or to maximize revenue by comparing bids on different exchanges. The result is that publishers commit their inventory exclusively to Google rather than incur the additional expense of ‘multi-homing,’” meaning rather than incurring the additional expenses associated with placing their inventory on multiple platforms.**

- a. For each of the last 10 years, please state:

- (1) The share of AdX auctions won by bids submitted through AdWords;
  - (2) The share of AdX auctions resulting from DoubleClick for Publisher requests;
  - (3) The share of DoubleClick for Publisher requests serving advertisements on AdX instead of competing exchanges.
- b. Does Google require exclusive agreements at any stage of its advertising sales, display, or development process?
  - c. Does Google deliberately disable or refuse to develop cross-platform interoperability for any of its services or subsidiaries related to advertising?

Google's standard agreements for Google Ad Manager and Authorized Buyers do not include any exclusivity provisions. Google does not make changes to any of its AdX or DoubleClick for Publisher services or subsidiaries related to advertising with the goal of disabling or refusing to develop cross-platform interoperability. Several factors may be weighted by individual services when choosing to build features related to cross-platform interoperability, including the need to comply with privacy laws and to protect user or proprietary business data.

- 45. Google has approximately \$150 billion in annual revenue—nearly all from advertising. Nevertheless, approximately 600 million people globally have installed ad-blocking software to eliminate advertising which no doubt impacts publishers. Google's Senior Vice President, Sridhar Ramaswamy, has said that Google makes payments to companies who produce advertisement-blocking software to ensure that their software does not block Google advertisements.**
- a. Does Google pay any developers, owners, licensors, or vendors of advertisement-blocking software to ensure:
    - (1) That Google's advertisements are seen notwithstanding such software?
    - (2) That Google's advertisements are seen more often than competing advertisements?
    - (3) That *non-Google* advertisements are blocked by such software?
    - (4) That advertising software blocks Google and non-Google advertisements at differing rates?
  - b. If so, how much has Google paid in the past 10 years to these companies for this purpose?
  - c. If so, to whom has Google made such payments, and when? Please further identify the date of each such payment.

In general, advertisement-blocking softwares usually block only certain ads, particularly ones that are distracting or involve pop-ups. Google's ads, like other companies' ads, will be

displayed if they comply with the software's acceptable ads requirements. Noncompliant ads, including Google's ads, will be blocked.

**46. What percentage of all online advertisements are served:**

- a. Through at least one of Google's affiliates, subsidiaries, properties, or products?
- b. Through specifically Google AdManager?

Google only has visibility into a portion of online advertising impressions. We cannot therefore confirm what percentage of the total number of online advertising impressions Google is involved in facilitating.

**47. What percentage of advertisements on Google properties (e.g., YouTube, Google Search), are served through Google AdManger?**

- a. Does Google require users seeking to advertise on YouTube to purchase ads served through Google AdManager?
- b. Does Google require users seeking to advertise on Google Search to purchase ads served through Google AdManager?
- c. Is Google currently capable of offering advertisements on YouTube without requiring those advertisements to be served through Google AdManager?
- d. Is Google currently capable of offering advertisements on Google Search without requiring those advertisements to be served through Google AdManager?
  - (1) If Google is not so capable, has Google explored, developed, or attempted to develop the capability of so doing?
  - (2) If Google is so capable, why does Google require users to use Google AdManager as a condition of purchasing such advertisements?

Google Ad Manager does not serve any Google Search Ads and serves a very small portion of ads on YouTube. YouTube's Partner Sales program allows top content creators to serve ads through either Google Ad Manager or the Freewheel ad platform.

**48. What loss of functionality would arise if a publisher attempted to access AdX using an ad server other than Google Ad Manager?**

- a. Can Google provide full interoperability between AdX and advertising servicers, servers, or services that compete with Google AdManager (in any product or geographic market)?
- b. If so, why has Google declined to develop or provide such interoperability?

- c. If not, will Google permit third-party servicers to attempt to develop such interoperability if those servicers commit to making such interoperability available on a fair, reasonable, and non-discriminatory basis?**

AdX is an ad exchange and does not directly bid into auctions run by third-party ad servers. AdX operates in combination with third-party ad servers through Google Publisher Tag (GPT) passbacks and AdX direct tags. A third-party ad server can make a call to AdX using a GPT passback or AdX direct tag to serve an ad matching specified targeting criteria. The Ad Manager ad server will then return an ad that matches the specified targeting criteria.

**49. I understand that Google has a two-step auction process for placing advertisements, whereby the winning bid in an AdWords auction is subsequently entered into an auction by AdX.**

- a. Is this process substantially accurate? If not, please explain the Google auction process and how AdWords and AdX work in that process.**
- b. Does Google charge a commission for participation in both AdWords and AdX?**
- c. Can an advertiser participate in just one auction—AdWords or AdX—and still successfully purchase an advertisement?**
- d. Does Google earn additional commissions or additional revenue based on this two-step process?**
- e. Can Google serve advertisements through a one-step process?**
- f. What is the business justification for using this two-step process?**

The description above is substantially accurate. Like other demand sources representing many advertisers, such as Demand Side Platforms (DSPs) and ad networks, Google Ads (formerly Adwords) typically runs an internal auction to select a winner before forwarding the winner's bid to an exchange. More information on how this works is available at <https://support.google.com/google-ads/answer/2472739>.

Google Ads represents advertisers, and implements its auction and bidding algorithms in the best interest of its advertiser customers (such as by optimizing for advertiser objectives, like return on investment, or customer reach). Google Ad Manager represents publishers, and implements its auction and ad selection algorithms in the best interest of its publisher customers (such as by optimizing for publisher revenue). These buying and selling products interoperate but are run as separate entities, and each may charge a revenue share or commission to its respective customers.

**50. What formal or informal safeguards are in place to ensure that Google's advertisement auctions are administered in:**

- a. A fair manner?**
- b. A reasonable manner?**
- c. A non-discriminatory manner?**

Our ad auctions are subject to intense scrutiny by advertisers, publishers, competitors, regulators and independent auditors. We post dozens of articles in the Google Ads Help Center and publish white papers and other materials, describing how the auction and its various components work. And we've developed dozens of highly detailed reporting tools that give advertisers very granular insights into their performance in the auction.

**51. Google AdX has the discretion to adjust “the bid submitted by the buyer for purpose of optimizing the auction.”**

- a. Under what circumstances does Google adjust bids upwards?**
  - (1) Does a bidder have notice of such an adjustment before it becomes binding?**
  - (2) Does a bidder have the right to reject such an adjustment before sale?**
  - (3) Does a bidder have the right to reject such an adjustment after sale?**
- b. Under what circumstances does Google adjust bids downwards?**
- c. What factors or conditions guide the exercise of this discretion?**

Google Ad Manager's ad exchange feature is designed to help publishers optimize revenue from their ad sales. There are two common situations where Google may make adjustments to optimize the auction process. First, Google may apply optimization to video ads in which the billing event that triggers payment occurs later than some other ads (i.e., when the first frame of the video plays) and can help avoid the situation where an unreliable ads server fails to serve an ad at all, causing the publisher to lose out on revenue. The second typical scenario is where a publisher has elected to use the revenue-share optimization account setting, which is optional and meant to facilitate sales. More information is available on the support page, “Configure your Ad Exchange revenue share” at: <https://support.google.com/admanager/answer/7031785>). Google is always looking for ways to enhance its product options for publishers and advertisers, including Google Ad Manager, and will continue to do so.

**52. In 2008, the Federal Trade Commission approved Google's acquisition of DoubleClick.**

- a. What conditions did the Federal Trade Commission formally or informally request or impose on Google as a condition of approval of that acquisition?**
- b. Has Google at any point—prior to or following the acquisition—understood that the FTC conditioned its consent to the acquisition on Google's commitment not to combine data acquired or collected through DoubleClick with data acquired through other Google services, such as Google Search?**

After examining the evidence bearing on Google’s proposed acquisition of DoubleClick, the FTC voted 4-1 to close its investigation, concluding that because “the evidence did not support the theories of potential competitive harm, there was no basis on which to seek to impose conditions on this merger.”

**53. Google and YouTube generate revenue in part by selling advertising space. I understand that Google charges for advertisements in part based on the number of “views” an advertisement receives, with a “view” meaning that a human has actually seen the advertisement.**

- a. What constitutes a “view” for purposes of advertising with Google? To the extent this term differs depending on the different services, platforms, or products that Google or its subsidiaries or affiliates offer, please describe that answer for each service, platform, or product as well as each subsidiary or affiliate. In particular:
  - (1) Please explain what a “view” is for each different type of:
    - 1. Advertisement**
    - 2. Publisher****
  - (2) Please particularly explain what constitutes a “view” for advertising on or through YouTube.****
- b. How does Google report viewability of advertisements to advertisers?**
- c. How does YouTube report viewability of advertisements to advertisers?**
- d. Does Google differentiate between a “view” that can be verified as having been incurred because of an actual, human visit to a given advertisement property and one that occurs when a bot or other non-human script, machine, routine, or entity “views” such an advertisement?**
- e. To Google’s best knowledge, investigation, or estimate:
  - (1) What percentage of “views” occur through bots or non-human means?**
  - (2) What total number of “views” occur through bots or non-human means?****
- f. Does Google charge fees for “views” accrued through bots or other non-human means?**

Google is committed to ensuring that advertisers don’t have to pay for invalid traffic. We use automated filters, manual detection and review, and invest efforts in botnet hunting and research. Our Ad Traffic Quality team is dedicated to stopping all types of invalid traffic so that advertisers don’t have to pay for it and the people who cause it do not profit from it. We also work closely with industry groups like the Interactive Advertising Bureau, Media Rating Council, and Trustworthy Accountability Group, among others, to develop industry standards for advertising traffic worldwide.

Each click on an ad is examined by our system, and Google employs sophisticated systems to identify invalid clicks and impressions and remove them from an advertiser’s account data.

Invalid traffic is any activity that doesn't come from a real user with genuine interest. It can include accidental clicks caused by intrusive ad implementations, fraudulent clicking by competing advertisers, advertising botnets and more. You can learn more about what constitutes valid ad traffic and a “view” of a video advertisement at <https://support.google.com/google-ads/answer/2375431> and <https://www.google.com/ads/adtrafficquality/invalid-activity.html>.

When Google determines that clicks are invalid, we try to automatically filter them from an advertiser’s reports and payments so that they are not charged for those clicks. If we find that invalid clicks have escaped automatic detection, an advertiser may be eligible to receive a credit for those clicks. These credits are called “invalid activity” adjustments. You can read more about our efforts to combat invalid traffic at <https://www.google.com/ads/adtrafficquality/how-we-prevent-it.html>.

We also provide advertisers with tools to track and view ad campaign performance data such as views and engagement metrics. More details can be found at <https://support.google.com/google-ads/answer/2404036>.

- 54. It is increasingly popular in modern society for consumers to demand that companies they patron not transact business with individuals or companies that they view as objectionable in some way. Given that advertisers are most likely to bid on audiences rather than advertising space, does Google offer services to ensure that an advertiser does not place its advertisements on websites, YouTube accounts, or publishers that its consumers may find objectionable?**
- a. If so, describe those services, and state whether Google ever applies these services with the express request of the advertiser.

Google provides advertisers with the ability to control where their ads are placed. More information on how an advertiser can ensure that their ads don’t run on certain sites or apps (or certain categories of sites or apps) can be found at <https://support.google.com/google-ads/answer/2454012>.

- 55. A recent study on “Top Stories” from Northwestern University showed that 62.4 percent of Google’s Top Stories came from ideologically liberal websites and only 11.3% came from conservative websites. The study also discovered that of the 10 domains with most impressions, only one (Fox News) leaned conservative.**
- a. Does Google aim for neutrality among speakers, viewpoints, and ideologies when determining—or programming algorithms or other mechanical ways of determining—its Top Stories?
  - b. Does Google consider the drastic ideological bias of Top Stories to be a problem?
    - (1) If so, what has Google done to remedy this problem?
    - (2) If not, would Google consider it a problem if:



1. **75% of its Top Stories came from ideologically liberal websites?**
  2. **90%?**
  3. **100%?**
- c. **Has Google contracted for a third-party to conduct an independent investigation to determine the source of this ideological bias?**
- (1) **If so, please state on whom Google is relying for this investigation, identify the data to which that investigator has access, attach any interim or final report produced; if no final report has been produced, state when one will be available.**
  - (2) **If not, does Google intend to conduct such an investigation?**
- d. **Has Google conducted an internal investigation to determine the source of this ideological bias?**
- (1) **If so, please produce any final report or findings, or state when they will be available.**
  - (2) **If not, does Google intend to conduct such an investigation?**
- e. **What steps, if any, has Google taken to reduce this ideological bias?**

We are aware of this study and do not agree with its methodology. Our products are built for everyone, and we design them with extraordinary care to be a trustworthy source of information without regard to political viewpoint. Our users overwhelmingly trust us to deliver the most helpful and reliable information out there. Distorting results for political purposes would be antithetical to our mission and contrary to our business interests.

**56. In what percentage of Google Search queries triggering the Top Stories function does the user:**

- a. **Click on a link featured in the Top Stories function?**
- b. **Click on an organic link—that is, a link that has not been promoted by Google in exchange for consideration?**
- c. **Click on a sponsored link?**
- d. **Remain on a Google property—either because the user is directed to an AMP or otherwise?**

Our approach to news is founded upon Google’s mission to organize the world’s information and make it universally accessible and useful. If a user searches for a topic that’s in the news, their results may include some news articles labeled “Top Stories” at the top of the results, featuring articles related to the search and a link to more related articles on the News tab. Depending on the user’s search term(s), many additional sources of information may appear, such as Knowledge Panels and Search Ads, in addition to organic links. In addition to choosing to click on any of these links, a user may also choose to refine their search or click on a suggested related Search. Our ultimate goal, however, is to provide a user with the information that the user is seeking, in the fastest form available.

Google has long sent large amounts of traffic to third parties. We strongly believe that by creating the best Search experience for people around the world, we will overall be able to deliver more traffic to sites across the web. We're always exploring new ways to engage with and ensure we're supporting the ecosystem.

**57. When there are multiple news articles on a given issue, how does the Top Stories algorithm determine which issues to include as Top Stories? Please explain in detail.**

As described above, Google's news experiences are designed to help users quickly discover relevant, authoritative news from a range of sources across the web. If a user searches for a topic that's in the news, their results may include some news articles labeled "Top Stories" at the top of the results, featuring articles related to the search and a link to more related articles on the News tab. Users can also search for news stories and see context and multiple perspectives in the results on <http://news.google.com/>, news on the Assistant, and within the "Top News" section of search results on YouTube.

Our algorithms surface and organize specific stories and articles based on factors like relevance to the user's query, prominence and freshness of the article, and authoritativeness of the publisher. Users can always refine their search terms to find additional information.

More information about how our News products work is available at <https://newsinitiative.withgoogle.com/hownewsworks/approach/>.

**58. Is a webpage more or less likely to be included in Top Stories if it employs Google's Accelerated Mobile Pages?**

Accelerated Mobile Pages (AMP) is an open-source HTML framework overseen by the AMP Open Source Project. Open Source Projects are designed for the benefit of all users and the digital ecosystem. AMP helps webmasters create web pages that are fast, smooth-loading and prioritize the user-experience, which helps publishers create mobile-friendly websites.

Google's Search ranking is based on over 200 factors that interact in complex ways. A web page's status as an AMP Page is not one of the factors considered. Specifically, content does not receive any ranking advantage in general Google Search results merely because it is AMP, and content is not penalized in organic Google Search results for being non-AMP.

Some limited Search features require AMP content for technical reasons. For example, there is a type of specialized search result called the "Top Stories carousel" on mobile devices, in which a selection of fast-loading mobile pages of news stories are displayed together to allow a user to quickly "flip" through them. Because the carousel user experience involves being able to click on an article in the carousel and then swipe between full pages of content in a "viewer" (essentially an AMP gallery), this carousel does require caching, privacy-preserving

pre-rendering, and embeddability, which are implemented via the AMP framework on the technical level. Carousels typically appear only on mobile devices and only for certain content types, making up only a small portion of Google’s overall search results.

Non-AMP content can and does appear everywhere else on the Search results page, including as part of the “Top Stories” block above the AMP carousel or in the organic links that make up the remainder of the page. For more information, please see <https://webmasters.googleblog.com/2018/01/using-page-speed-in-mobile-search.html>.

**59. When there are multiple news articles on a given issue, how does the Top Stories algorithm determine the order in which to rank news articles?**

As described in more detail on our public website about Google News, available at <https://newsinitiative.withgoogle.com/hownewsworks/approach/>, like Google Search, our news algorithms look at a number of factors, including the relevance and freshness of the content, as well as the expertise of the source, to determine the articles that are returned. Each of these factors is weighed alongside the others and would not be the sole reason for showing an article.

**60. Does a webpage’s ranking in Top Stories in any way depend on whether it employs Google’s Accelerated Mobile Pages?**

As described in response to question 58, Accelerated Mobile Pages (AMP) is an open-source HTML framework overseen by the AMP Open Source Project. AMP helps webmasters create web pages that are fast, smooth-loading and prioritize the user-experience, which helps publishers create mobile-friendly websites.

The Top Stories carousel on mobile devices includes a selection of fast-loading mobile pages of news stories are displayed together to allow a user to quickly “flip” through them. Because the carousel user experience involves being able to click on an article in the carousel and then swipe between full pages of content in a “viewer” (essentially an AMP gallery), this carousel does require caching, privacy-preserving pre-rendering, and embeddability which are implemented via the AMP framework on the technical level. Carousels typically appear only on mobile devices and only for certain content types, they make up only a small portion of Google’s overall search results.

Non-AMP content can and does appear everywhere else on the Search results page, including as part of the “Top Stories” block above the AMP carousel or in the organic links that make up the remainder for the page. For more information, please see <https://webmasters.googleblog.com/2018/01/using-page-speed-in-mobile-search.html>.

**61. Does Google collect data that can be used to identify or predict a user’s political affiliation or preferences?**

- a. Does Google at any point in its services or products, or through any of its affiliates or subsidiaries, attempt to predict the political affiliation or political preferences of any of its users?
  - (1) If so, what products, services, or affiliates attempt to make such a prediction?
    - 1. Is such a prediction stored?
    - 2. If so, is such a prediction associated with any Google user's accounts of any kind?
  - (2) If so, on what does Google base this prediction?
  - (3) Does Google gather data specifically to make such a prediction?
- b. Does Google tailor search results, suggestions, OneBox answers, or any other part of its user experience depending on its assessment of a user's likely political affiliation or ideological leaning? This includes voting reminders, the proffering of political or ideological advertisements, and so on.
- c. Does Google tailor advertising availability or prices based on the political affiliation or ideological leaning of the expected viewers of the advertisement?
- d. Top Stories in any way use data regarding any and all potential users' political affiliations or ideological leanings to determine which news stories to suggest to a user?

Advertising availability and prices are determined through Google's advertising auction process. This process works the same regardless of whether political affiliation is used as a targeting feature. To the extent permitted by applicable law, political affiliation may be used to target ads to users or to promote advertisers' products or services in the United States if the advertiser is verified by Google.

**62. As discussed in question 16, Google Search assigns a "page quality" rating to each webpage, and that rating influences a user's search results.**

- a. Does Top Stories use the "page quality" rating from Google Search?
- b. If so, to what extent and in what way does this "page quality" rating influence the Top Stories algorithm?
  - (1) What are the page quality ratings for the webpages or sources identified in the Northwestern University study identified in question 55?
  - (2) What is the average page quality rating for webpages or stories identified during each month of calendar year 2019?

Google's news experiences are designed to help users quickly discover relevant, authoritative news from a range of sources across the web.

If a user searches for a topic that's in the news, their results may include some news articles labeled "Top Stories" at the top of the results, featuring articles related to the search and a link to more related articles on the News tab. Users can also search for news stories and see context and multiple perspectives in the results on news.google.com, news on Google Assistant, and within the "Top News" section of results on YouTube.

Our algorithms surface and organize specific stories and articles based on factors like relevance to the user's query, prominence and freshness of the article, and authoritativeness of the publisher. Users can always refine their queries to find additional information.

More information about how our News products work is available at <https://newsinitiative.withgoogle.com/hownewsworks/approach/>. As we explain in our response above, our Page Quality ratings are confidential and proprietary. Because, we invest significant resources into developing and maintaining them, we do not share our results with the public.

**63. Does the Top Stories algorithm in any way identify, use, rely on, or check a webpage's political or ideological orientation? A user's?**

Google's Top Stories algorithms, like all search algorithms, do not consider a user's or webpage's political or ideological orientation.

**64. As part of Google News, Google employs a "News Curation Team" that curates both "topic[s]" and "source[s]."**

- a. Describe the job duties of:
  - (1) Employees on the News Curation Team.
  - (2) Managers on the News Curation Team.
- b. Provide any and all training materials provided to Google News Curators, News Curation Teams, and News Curation Team members, including all materials related to how managers on the team can or should attempt to ensure viewpoint neutrality when curating news, or can or should attempt to ensure personal ideological or partisan bias does not affect news curation.
- c. Does Google attempt to provide politically unbiased news through this team?
- d. How many individuals does Google employ or contract to work on News Curation Teams?
- e. How many of these individuals:
  - (1) Self-identify with the Democratic Party?
  - (2) Are registered as a Democrat?
  - (3) Self-identify as liberal or progressive?
  - (4) Self-identify with the Republican Party?
  - (5) Are registered as a Republican?

- (6) Self-identify as conservative?**
- f. How many of these individuals:**
  - (1) Have donated to the Democratic Party?**
  - (2) Have donated to a candidate running for office as a Democrat?**
  - (3) Have donated to a cause primarily affiliated with or supported by the Democratic Party?**
  - (4) Have donated to a cause primarily affiliated with or supported by liberal interest groups?**
  - (5) Have donated to a political action committee (PAC) primarily advocating for the Democratic Party, Democratic candidates or office-holders, or causes primarily supported by the Democratic Party?**
  - (6) Have donated to the Republican Party?**
  - (7) Have donated to a candidate running for office as a Republican?**
  - (8) Have donated to a cause primarily affiliated with or supported by the Republican Party?**
  - (9) Have donated to a cause primarily affiliated with or supported by conservative interest groups?**
  - (10) Have donated to a PAC primarily advocating for the Republican Party, Republican candidates or office-holders, or causes primarily supported by the Republican Party?**
- g. If you do not have sufficient information to answer the questions in subparts (c) through (f) of this question, explain whether Google believes that ideological diversity among News Curators is important to providing a politically unbiased service.**

The Google News Curation Team is made up of a diverse group of employees that help curate specific topics for major events, such as award shows or sports championships, as well as general interest topics like business, technology, or scientific news. The topics are selected on empirical signals such as aggregate publisher activity and demonstrable user interest. For these topics, the curation team provides additional structure, such as subtopics. For example, in the case of the Olympics, it may include information regarding certain sports, like swimming or track and field. The News Curation Team only defines a structure: they do not select specific stories or news outlets to highlight in these topics.

Google's Newsstand tab also contains promotions, featured content, and collections of sources around a given theme or event. The News Curation team also identifies publishers for these promotions based on, among other factors, the publisher's popularity, whether there are seasonal or event-driven collections, whether the publisher offers any limited-time offers for discounted prices, and whether the publisher's edition is up to date and free of technical problems.

We do not maintain information regarding our employees' political affiliations or identifications, and do not have a readily searchable database of internships or volunteer activities.

**65. According to Google's website, Google News Curation teams are managed "independently" from other business teams at Google.**

- a. **What policies, procedures, firewalls, or other mechanisms does Google employ to ensure this independence?**
- b. **Since Google began Google News, how many Google employees have transferred from other positions to a Google News Curation team?**
- c. **Do other Google employees outside News Curation teams have any role or input in the process of source curation?**
- d. **If so, please list which group of employees have a role in this curation process.**

Our News Curation Team takes its independence and objectivity seriously. When selecting which stories to curate, the team relies on clear empirical signals such as aggregate publisher activity and trending data. The team can only define a structure for presenting news: they do not select specific stories or news outlets to highlight, which is governed by our algorithms. Nor does the team create original content. All content indexed in Google News comes from publishers and content creators who already exist on the Web. The team does not perform any reporting or gather additional information. Additionally, all of our employees are subject to our Alphabet and Google codes of conduct, available at <https://abc.xyz/investor/other/google-code-of-conduct/> and <https://abc.xyz/investor/other/code-of-conduct/>. We place special emphasis on our conflict of interest code with the News Curation Team, and they are instructed not to make decisions that may create a conflict of interest, or the appearance of a conflict of interest, based on a perceived interest of them or their families.

**66. Google's News Creation Teams create "sub-topics" to provide additional structure within Google News.**

- a. **List and describe the factors and guidelines for creating new "sub-topics."**
- b. **Do curation teams create sub-topics on political news events?**
- c. **If so, do the same guidelines apply and which employees are authorized to create the sub-topics?**

As described above, the Google News Curation Team helps curate specific topics for major events such as award shows or sports championships, as well as general interest topics like business, technology, or scientific news. The topics are selected on empirical signals such as aggregate publisher activity and demonstrable user interest. This information could include political news events, such as the 2020 election. Subtopics could include Governor races and Senate Races. As noted above, the News Curation Team only defines a structure—they do not select specific stories or news outlets to highlight in these topics.

**67. As discussed in question 16, Google Search assigns a “page quality” rating to each webpage, and that rating influences a user’s search results. Does Google News use the “page quality” rating from Google Search?**

**If not:**

- a. Does Google News in any way rate or review the quality of webpages?**
- b. What are the metrics Google uses to evaluate the quality of a news source?**

As discussed in our public website, available at <https://newsinitiative.withgoogle.com/hownewsworks/>, Google News also uses thousands of trained external Search Quality Raters around the world to measure the quality of Search results on an ongoing basis. Raters assess how well a website provides what users are looking for and evaluate the quality of results based on the expertise, authoritativeness and trustworthiness of the content. These ratings do not directly impact ranking, but they do help us benchmark the quality of our results and make sure these meet a high bar all around the world. Guidelines governing their ratings are publicly available for anyone to see at <https://static.googleusercontent.com/media/www.google.com/en//insidesearch/howsearchworks/assets/searchqualityevaluatorguidelines.pdf>.

**68. Google states that, “[r]anking in Google News is determined algorithmically based on a number of factors, including: Freshness of Content; Diversity of Content; Rich textual content; Originality of content; [and] User preferences for topics or publishers.” What other factors does the algorithm consider in ranking Google News stories?**

**69. Regarding the factor “Diversity of Content”:**

- a. How does Google define “diversity of content”?**
- b. Has Google’s definition of “diversity” for purposes of Google News changed since 2012?**
- c. Who determines whether a news story adds or distracts from the “diversity of content”?**
- d. List all types or categories of “diversity” that Google News considers.**
- e. Does Google consider diversity of political or ideological perspective to be a part of “diversity of content”?**
- f. If so, what steps does Google take to ensure that Google News does not suffer from the same ideological bias as Google Top Stories?**
- g. What weight is given to a page’s “diversity of content” relative to other factors in determining whether a page or its content will appear as a Top Story?**

**70. Regarding the factor “Rich textual content.”**

- a. How does Google define “rich textual content”?**



- b. Does this factor in any way depend on a news publisher employing Google products or services, including Accelerated Mobile Pages?**
- c. Relative to other factors, what weight is given to a page’s “rich textual content” when determining whether it will appear as a Top Story?**

We answer questions 68-70 together. We care deeply about being a source of information that users can trust, including on Google News. We also want our users to understand our products. That is why we describe how Google News works, including the algorithmic basis, in detail at <https://newsinitiative.withgoogle.com/hownewsworks/approach/surfacing-useful-and-relevant-content/>. In the Help Center article you cite, Google’s use of the phrase “diversity of content” refers to surfacing information from many different sources and websites, rather than returning information from only one or two sources. As we describe in our public websites, a central goal of Google’s news experience is to provide access to context and diverse perspectives for stories in the news. Google empowers people to deepen their understanding of current events and offers an alternative to exclusively personalized news feeds and individual sources that might only represent a single perspective. While some personalized news experiences are designed to connect users with stories we have determined they may be interested in, none of our systems endeavor to assess a publisher’s—or a user’s—ideological or political leanings. Our reference to “rich contextual content” is a reference to the importance of the content itself in ranking news stories in Google News. High-quality, informative articles will perform better than articles that are very simple or merely repeat what others have already published.

**71. Regarding the factor “User preferences for topics or publishers.”**

- a. Explain what this factor entails.**
- b. Does this factor or any other factor in any way consider the ideological or political orientation of individual news articles?**
  - (1) If so, how is the ideological or political orientation of an individual news article determined?**
  - (2) If so, how is the ideological or political orientation of an individual news article quantified or categorized?**
- c. Does this factor or any other factor in any way consider the ideological or political orientation of the author of a news article?**
  - (1) If so, how is the ideological or political orientation of an author determined?**
  - (2) If so, how is the ideological or political orientation of an author quantified or categorized?**
- d. Does this factor or any other factor in any way consider the ideological or political orientation of the publisher of a news article?**
  - (1) If so, how is the ideological or political orientation of a publisher determined?**
  - (2) If so, how is the ideological or political orientation of a publisher quantified or categorized?**

- e. Relative to other factors, what weight is given to “user preferences for topics or publishers” when determining whether a given webpage or its content will appear as a Top Story?**

Within the Google News service, users can explicitly indicate that they have an interest in certain topics, such as the 2020 election or baseball. Similarly, a user can indicate that they have an interest in certain publications, such as the Wall Street Journal. These preferences are not inferred by Google, and Google does not take into consideration ideological or political orientation of the author or news outlet. Top Stories is not personalized and is instead based on news surfaced by the user’s search query.

- 72. Do any of Google’s policy or business team personnel have any role in the development of these ranking factors or their application to any particular story, day, or news cycle?**

As described above, Google’s news experiences are designed to help users quickly discover relevant, authoritative news from a range of sources across the web. Like Search, our News algorithms undergo extensive testing and experiments prior to any changes being made. No single individual can influence the rankings of results returned from a query, and we do not allow political or business interests to influence our rankings.

- 73. Are these factors given the same weight regardless of the particular user or particular story? For example, are stories regarding Bernie Sanders and Donald Trump included in “Top Stories” based on the same *relative* weight of the factors outlined above?**

Top Stories is not personalized, and our algorithms treat news subjects the same.

- 74. Do the algorithms that produce Google News results in any way consider any of the following:**
  - a. Whether a news publisher or webpage employs any of Google’s advertising products?**
  - b. The revenue that Google expects to receive from a webpage or publisher.**

Google News algorithms do not take into account whether a publisher or webpage uses advertising products or other revenue considerations.

- 75. Google News is in many outward respects similar to Google Top Stories. And as described in question 55, researchers at Northwestern University have shown that Top Stories is politically or ideologically biased.**
  - a. What policies, procedures, trainings, or other steps has Google taken to ensure that Google News is not similarly biased?**

- b. **Has Google contracted for a third-party to conduct an independent investigation to determine whether Google News is politically or ideologically biased? If so, please state the third-party, identify the data to which it has access, attach any final report produced, and if no final report has been produced, state when one will be available.**
- c. **Has Google conducted an internal investigation to determine whether Google News is politically or ideologically biased? If so, please produce any final report or findings, or state when they will be available.**

We consider Google News and Google Top Stories to be distinct products, responsive to very different interests from users. Google News is an aggregation of news stories from a variety of outlets, highlighting trending news. Top Stories, in contrast, surfaces stories relevant to a user's query. For example, if a user searches for "Washington Nationals," news stories about recent games may surface, which would not otherwise appear on or near the top of Google News.

The Google News corpus includes a wide variety of news sites, with varying ideology. Google News connects users with publishers covering local, national, and international regions and working in a variety of languages and formats. Our goal is to provide a broad array of perspectives from multiple points of view.

**76. Please state the number of YouTube users elected to any political office or standing as a candidate for any political office in the United States (including any state, local, or municipal office) who have had content from their personal or official YouTube account banned, shadowbanned, or in any other way content demoted, downgraded, restricted, or blocked (whether permanently or temporarily) by YouTube, any of its employees or contractors, or any algorithm designed by YouTube or any of its employees or contractors. In providing this answer, please include all incidents, even if YouTube subsequently reversed or altered its decision.**

- a. **Please provide a complete list of the above-described incidents, naming each user or account affected, the video or content that lead to YouTube's decision, and the political affiliation of the user elected to or standing for political office. If YouTube is unable to provide a complete list, please provide the most complete list possible after a reasonable and thorough investigation, including, without limitation, all such incidents that are already a matter of public record.**
- b. **Does YouTube take the political affiliation of any user that is elected to political office or standing for political office in the United States into account when determining whether to take any adverse action regarding that user's personal or official account? For purposes of this question, please disclose instances when any individual moderator has ever taken such factors into account in making the decision to restrict any content or**

advertising in any way on behalf of YouTube, even if such consideration was contrary to YouTube policy.

- c. Does YouTube require or provide any internal training or education to moderators or administrators of its platform regarding how to enforce YouTube's policies in a politically neutral manner? If so, please indicate whether this training is mandatory or optional, what positions at YouTube may or must attend such training, the frequency with which these positions are required or able to attend such training, and the nature, extent, and duration of the training.
- d. Does YouTube take the stance on any political issue—for example, abortion—that a user that is elected to political office or standing for political office has adopted into account when determining whether to take any adverse action regarding that user's personal or official account? For purposes of this question, please disclose whether any individual moderator has ever taken such factors into account in making the decision to restrict any content in any way on behalf of YouTube, even if such consideration was contrary to YouTube policy.
- e. Conversely, does YouTube take such adopted stances into account when providing advertisement rates, coverage, duration, or any other factor affecting the cost or quality of an advertisement on YouTube? Again, for purposes of this question, please disclose whether any of YouTube's employees has ever taken such factors into account, even if such consideration was contrary to YouTube policy.

YouTube enforces its policies without any regard to the possible political affiliation of our content creators and advertisers. For additional information on the flags YouTube receives and how we enforce our policies, please see the report we make available at <https://transparencyreport.google.com/youtube-policy/removals>. With respect to advertising, we support responsible political advertising and expect all political ads and destinations to comply with local legal requirements, including campaign and election laws and mandated election "silence periods" for any geographic areas they target. Additionally, we require verification for advertisers who want to run election ads or use political affiliation in personal advertising in the United States. More about our verification process is available at <https://support.google.com/adspolicy/answer/9002729>.

- 77. Has YouTube ever conducted any investigation, whether formal, informal, or otherwise, to determine whether its content moderation polices or advertising rules have a disparate impact on users based on partisan identity (e.g. Republican) or issue positions (e.g. pro-life)?**
- a. If so, please provide the results of such investigation.
  - b. If not, why not? Will YouTube conduct such an investigation and provide the results of that investigation?

- c. **Has YouTube ever conducted any investigation, whether formal, informal, or otherwise, to determine whether its content moderation policies or advertising rules have a disparate impact on users who advocate for or against certain political or issue positions (e.g. abortion)?**
  - i. **If so, please provide the results of such investigation.**
  - ii. **If not, is YouTube willing to conduct such an investigation and provide its results?**

As explained above, YouTube enforces its policies without any regard to the possible political affiliation of our content creators. For additional information on the flags YouTube receives and how we enforce our policies, please see the report we make available at <https://transparencyreport.google.com/youtube-policy/removals>.

**78. Yes or no: Does YouTube consider itself a platform that is open to all ideas and all forms of expression that are protected by the First Amendment?**

- a. **Yes or no: Does YouTube consider itself to be a modern equivalent to the historical public square?**
- b. **Yes or no: Does YouTube consider itself to be a neutral public forum?**
- c. **When YouTube crafts its content moderation policies, does it seek to craft rules that are viewpoint neutral?**
- d. **When YouTube crafts its content moderation practices, does it seek to craft rules that are neutral among speakers?**
- e. **In practice, does YouTube moderate content and enforce its advertising rules on a viewpoint-neutral basis?**
- f. **Has YouTube ever made any moderating decision or enforced its advertising rules in a non-viewpoint-neutral manner? Please describe all such incidents, even if they were contrary to YouTube policy.**

YouTube is a platform for speech, ideas, and expression, but it is not a public square or public forum in the constitutional sense. While YouTube tries to create a space for ideas and expression, it is not a free for all. YouTube does not, for example, allow hateful content or videos that are violent, gory, or sexually explicit. YouTube strives to be evenhanded in how it crafts and applies its guidelines, without regard to the political perspective or affiliation of the creator. But some content and modes of expression are not allowed on YouTube. For example, users are not allowed to post videos that promote violence against particular ethnic or religious groups. Speakers who violate those rules may have their content removed or their accounts terminated. Similarly, YouTube strives to make its advertising rules evenhanded, but its rules forbid the monetization of certain content—for example, videos focused on terrorism or violent extremism.

**79. At the July 16 hearing, Mr. Bhatia said that YouTube has a policy against “hoax videos.”**

- a. **How does YouTube define a hoax video?**

- b. What is the difference between a hoax video and a video that contains false information?**
- c. Does YouTube consider a video in which Jussie Smollett recounts the alleged hate crime against him to be a hoax video? If not, why not?**
- d. Has YouTube ever employed its policy against hoax videos to remove a video discussing climate change?**
- e. Has YouTube ever employed its policy against hoax videos to remove a video depicting an abortion or the processes used during an abortion?**
- f. Has YouTube ever employed its policy against hoax videos to remove a video depicting Planned Parenthood or its affiliates, employees, independent contractors, or staff?**

As we explain above, we make our Guidelines publicly available, including online training deep-dives to further explain our policies at <https://creatoracademy.youtube.com/page/course/community-guidelines>. We work hard to maintain a safe community, invest heavily in our enforcement program that relies on both human reviewers and technology, and respond to flags of inappropriate content from automated flagging systems, members of the Trusted Flagger program (NGOs, government agencies, and individuals) or from users in the broader YouTube community. We publish a report that provides data on the flags YouTube receives and how we enforce our policies, available at <https://transparencyreport.google.com/youtube-policy/removals>. Regarding “hoax videos,” we publicly announced in a blogpost, available at <https://youtube.googleblog.com/2019/06/our-ongoing-work-to-tackle-hate.html>, that we will remove content denying that well-documented violent events, like the Holocaust or the shooting at Sandy Hook Elementary, took place.

- 80. Does YouTube remove videos where it becomes aware that one or more participants in the video have not granted consent to the broadcast of the video or to the underlying recording of the event?**
- a. Does YouTube permit videos that document the actual intentional, negligent, or attempted killing of another human being, whether that killing was lawful or unlawful?**
    - (1) If so, please explain under what circumstances YouTube permits the hosting of these videos.**
    - (2) If so, does YouTube remove these videos if the next-of-kin or authorized representative of the victim requests YouTube to do so?**
  - b. Does YouTube permit videos that fictionally depict the intentional, negligent, or attempted killing of another actual person (i.e. not a fictional character), whether such killing would be lawful or unlawful in the depiction rendered?**
    - (1) If so, please explain under what circumstance YouTube permits the hosting of these videos.**

- (2) If so, does YouTube remove these videos if the person so depicted requests YouTube to do so?
- c. Does YouTube permit videos that document an actual crime of violence against one or more victims?
  - (1) If so, please explain under what circumstances YouTube permits the hosting of these videos.
  - (2) If so, does YouTube remove these videos if the victim requests YouTube to do so?
- d. Does YouTube permit videos that fictionally depict a crime of violence against an actual person (*i.e.* not a fictional character)?
  - (1) If so, please explain under what circumstances YouTube permits the hosting of these videos.
  - (2) If so, does YouTube remove these videos if the person so depicted requests YouTube to do so?

We want users to feel safe on YouTube, and we encourage users to let us know if videos or comments on the site violate their privacy or sense of safety. We encourage users who object to a video to first contact the uploader. If they are unable to reach an agreement with the uploader, or if they are uncomfortable contacting them, users can request to have the content removed based on our Privacy Guidelines. More information on how this process works is available on our website at <https://support.google.com/youtube/answer/2801895>.

- 81. How does YouTube moderate, prohibit, ban, or in any way otherwise restrict or make less accessible content it considers to be “hate speech?”**
- h. How does YouTube define the term “hate speech?”**
  - i. What objective metrics, if any, does YouTube use to determine whether a webpage contains “hate speech?”**
  - j. To what extent does whether a video constitutes “hate speech” depend on the subjective judgment of the individual or individuals reviewing the video?**
  - k. What training, if any, does YouTube provide to reviewers tasked with determining whether videos contain “hate speech” in order to ensure that they do not discriminate on the basis of viewpoint or partisan affiliation?**
  - l. Has YouTube ever changed its definition of “hate speech” or how it applies its hate speech policies? If so, please describe those changes.**
  - m. Does YouTube down-rank, remove from suggestion features, demonetize, or take any other adverse action against videos or users based on content that YouTube currently regards as “hate speech” but would not have regarded as “hate speech” at some previous time?**

As we stated in answer to question 24, which raises similar questions, we operate in 190 countries, and hate speech laws vary by country. We respect the law as required in each country, and will block illegal hate speech content to comply with local laws. We also enforce

YouTube’s Community Guidelines, which prohibit content promoting violence or hatred against individuals or groups based on age, caste, disability ethnicity, gender identity, nationality, race, immigration status, religion, sex/gender, sexual orientation, victims of a major violent event and their kin, and veteran status.

We also have a policy that prohibits harassment and cyberbullying. Content or behavior intended to maliciously harass, threaten, or bully others is not allowed on YouTube. We make our Guidelines publicly available, including online training deep-dives to further explain our policies at <https://creatoracademy.youtube.com/page/course/community-guidelines>. We work hard to maintain a safe community, invest heavily in our enforcement program that relies on both human reviewers and technology, and respond to flags of inappropriate content from automated flagging systems, members of the Trusted Flagger program (NGOs, government agencies, and individuals) or from users in the broader YouTube community. We publish a report that provides data on the flags YouTube receives and how we enforce our policies, available at <https://transparencyreport.google.com/youtube-policy/removals>.

**82. Did or does YouTube collaborate with or defer to any outside individuals or organizations in determining whether to classify a particular statement as “hate speech?” If so, please list the individuals and organizations.**

YouTube has a Trusted Flagger program that provides robust tools for individuals, government agencies, and non-governmental organizations that are particularly effective at notifying YouTube of content that may violate our Community Guidelines. Content flagged by Trusted Flaggers is not automatically removed or subject to any differential policy treatment—the same standards apply for flags received from other users. Because of their high degree of accuracy, however, flags from Trusted Flaggers are prioritized for review by our teams.

**83. Did or does YouTube collaborate with or defer to any outside individuals or organizations in determining whether a given speaker has committed acts of “hate speech” in the past? If so, please list the individuals and organizations.**

- a. Does YouTube review these groups’ internal procedures in determining whether an entity is a “hate group” or committing acts of “hate speech” to determine that these determinations are not made on a partisan basis?**

As explained above, YouTube has a Trusted Flagger program that provides robust tools for individuals, government agencies, and non-governmental organizations that are particularly effective at notifying YouTube of content that may violate our Community Guidelines. All decisions about whether to take action against content that is flagged, however, is made by YouTube. Content flagged by Trusted Flaggers is not automatically removed or subject to any differential policy treatment—the same standards apply for flags received from other users. Because of their high degree of accuracy, however, flags from Trusted Flaggers are prioritized for review by our teams.



**84. YouTube is not subject to the First Amendment’s limitations against government censorship, and is free to moderate content as it sees fit in the same way that the New York Times or Wall Street Journal do.**

- a. As YouTube defines “hate speech,” does YouTube believe that its hate speech policy affects content that would be protected from government censorship by the First Amendment?**
- b. If so, please describe what content would be subject to YouTube’s policy that is nonetheless protected from government censorship by the First Amendment.**

YouTube provides a platform for others to share ideas and content. As an important part of that service, we have rules of the road, defined in our Community Guidelines, that prevent certain content, like hate speech, from appearing on our platform. The Supreme Court has held that only certain narrow categories of speech (for example, defamation and true threats) are categorically unprotected by the First Amendment—“hate speech” has never been identified as such a category. As the Supreme Court has recognized, the founders, when crafting the Constitution, understood and appreciated the difference between government censorship and the choices that individual citizens and companies make regarding the content that they share, and that the First Amendment plays an important role in distinguishing between these situations.

**85. Yes or no: Has YouTube ever removed content for “hate speech” that did not directly attack or threaten a person on the basis of his or her race, ethnicity, national origin, religious affiliation, sexual orientation, sex, gender, or gender identity, or serious disabilities or diseases? If so, what criteria did YouTube use to determine that the content violated YouTube policy?**

As we explain elsewhere, YouTube has a Hate Speech policy. YouTube removes content promoting violence or hatred against individuals or groups based on a number of attributes. This means that YouTube does not allow content that encourages violence against individuals or groups based on any of the attributes noted above. Examples of content that violate the policy include:

- Dehumanizing individuals or groups by calling them subhuman, comparing them to animals, insects, pests, disease, or any other non-human entity;
- Praising or glorifying violence against individuals or groups based on the attributes noted above;
- Using racial, ethnic, religious, or other slurs where the primary purpose is to promote hatred;
- Using stereotypes that incite or promote hatred based on any of the attributes noted above;

- Claiming that individuals or groups are physically or mentally inferior, deficient, or diseased based on any of the attributes noted for the purpose of inciting hatred. This includes statements that one group is less than another, calling them less intelligent, less capable, or damaged;
- Alleging the superiority of a group over those with any of the attributes noted above to justify violence, discrimination, segregation, or exclusion;
- Conspiracy theories ascribing evil, corrupt, or malicious intent to individuals or groups based on any of the attributes noted above;
- Calling for the subjugation or domination over individuals or groups based on any of the attributes noted above; and,
- Denying that a well-documented, violent event took place.

**86. In recent years, major companies, advertisers, and individuals have threatened to boycott or take other negative economic actions against technology companies if they allow users to publish disfavored speech. For example, in February 2018, Unilever, one of the world’s largest advertisers, warned YouTube that it could pull its advertisements from YouTube’s advertising ecosystem if YouTube did not do more to prevent, among other things, “hate speech.”**

- a. Has YouTube ever demonetized, blocked, down-ranked, down-rated, shadowbanned, removed from auto-suggest, or otherwise taken negative action against a channel in whole or in part because of threatened, promised, or anticipated economic or business consequences?**
- b. Does YouTube consider taking a negative action under these circumstances to be “censorship”?**

We understand the brand safety concerns of our advertisers, who do not want their advertisements to appear on content that they find objectionable. We have longstanding advertiser-friendly guidelines that prohibit ads from running on videos that include hateful content, and we enforce these rigorously. We’ve publicly discussed these actions in recent blogs, available at <https://youtube.googleblog.com/2017/12/expanding-our-work-against-abuse-of-our.html> and <https://youtube.googleblog.com/2019/06/our-ongoing-work-to-tackle-hate.html>.

**87. In May 2019, Vox journalist Carlos Maza accused conservative commentator Steven Crowder of harassment and called on YouTube to remove Crowder’s videos. YouTube declined, stating that Crowder’s videos did not violate YouTube’s terms of serve. But the next day, after receiving both internal and external criticism, YouTube amended its prior statement, claiming that the videos “harmed the broader community,” and suspended Crowder’s channel’s monetization.**

- a. Does YouTube’s position remain that Steven Crowder’s channel neither attacked, threatened, nor harassed Carlos Maza?**

- (1) If so, on what basis did YouTube determine that Crowder’s videos “harmed the broader community?”**
  - 1. What “broader community?”**
  - 2. Are advertisers considered part of the “broader community”?**
  - 3. On what objective metrics did YouTube base this determination?**
  - 4. What employee or officer of YouTube was responsible for this determination?**
- (2) If not, why has YouTube changed its position?**
- b. Does YouTube’s position remain that Steven Crowder was not engaged in “hate speech?” If not, why has YouTube changed its position?**
- c. Did any advertisers threaten any adverse economic or business action of any kind and of any magnitude if YouTube did not take negative action against Steven Crowder’s YouTube channel? If so, please explain whether and to what extent that affected YouTube’s decision to demonetize his channel.**

We took this issue very seriously and explained our process for evaluating the issue in a public blogpost, available at <https://youtube.googleblog.com/2019/06/taking-harder-look-at-harassment.html>. In the case of Crowder’s channel, a thorough review found that individually, the flagged videos did not violate our Community Guidelines. In the subsequent days, however, we saw the widespread harm to the YouTube community resulting from the ongoing pattern of egregious behavior, took a deeper look, and made the decision to suspend monetization. We understand that context is important and learned from this incident. We are always reviewing our policies and practices, and will continue to take broader reviews of the context and impact of YouTube Creators.

- 88. Has YouTube ever demonetized, blocked, down-ranked, down-rated, shadowbanned, removed from auto-suggest, or otherwise taken negative action against a channel in whole or in part because advertisers within YouTube’s ecosystem threatened, promised, insinuated, or otherwise suggested that they would take adverse action of any kind and of any magnitude against YouTube or Google—including actions such as lowering advertising spending or declining to place advertisements through Google or YouTube?**
- a. Did any advertisers threaten any adverse action if YouTube did not take negative action against Steven Crowder’s YouTube channel?**

The success of the YouTube Partner Program and our creators is dependent upon the willingness of advertisers to associate their brands with YouTube content, and the earnings of all creators are negatively impacted when advertisers lose trust. We did receive complaints from large advertisers expressing concern related to Steven Crowder’s YouTube Channel.

- 89. Has YouTube ever demonetized, blocked, down-ranked, down-rated, shadowbanned, removed from auto-suggest, or otherwise taken negative action against the channel of, or any individual video, from any of the following groups:**
- a. The American Civil Liberties Union**
  - b. Media Matters For America**
  - c. National Right to Life Committee**
  - d. Susan B. Anthony List**
  - e. American Association of Pro-Life Obstetricians & Gynecologists**
  - f. Physicians for Life**
  - g. Americans United for Life**
  - h. Feminists for Life**
  - i. Republican National Coalition for Life**
  - j. Planned Parenthood**
  - k. Center for Reproductive Rights**
  - l. EMILY's List**
  - m. NARAL Pro-Choice America**
  - n. National Abortion Federation**
  - o. National Coalition of Abortion Providers**
  - p. National Organization for Women**
  - q. National Rifle Association**
  - r. Gun Owners of America**
  - s. The Coalition to Stop Gun Violence**
  - t. Everytown for Gun Safety**
  - u. The Brady Campaign**
  - v. Human Rights Campaign**
  - w. Amnesty International**
  - x. Lambda Legal**
  - y. National Immigration Forum**
  - z. Federation**
  - aa. GLAAD**
  - bb. ACLU**
  - cc. UnidosUS (formerly "La Raza" or the "National Council of La Raza")**
  - dd. The Sierra Club**
  - ee. Greenpeace**
  - ff. The Heritage Foundation**
  - gg. The Cato Institute**
  - hh. The Institute for Justice**
  - ii. Southern Poverty Law Center**
  - jj. Open Society Foundations**
  - kk. Americans for Prosperity**

YouTube enforces its policies without any regard to the possible political affiliation of our content creators and advertisers. As we explain above, we make our Guidelines publicly

available, including online training deep-dives to further explain our policies at <https://creatoracademy.youtube.com/page/course/community-guidelines>. We work hard to maintain a safe community, invest heavily in our enforcement program that relies on both human reviewers and technology, and respond to flags of inappropriate content from automated flagging systems, members of the Trusted Flagger program (NGOs, government agencies, and individuals) or from users in the broader YouTube community. We publish a report that provides data on the flags YouTube receives and how we enforce our policies, available at <https://transparencyreport.google.com/youtube-policy/removals>.

When a YouTube channel receives a strike for violating our guidelines, we inform the owner by email, through notifications on mobile and desktop, or in their channel settings. The notification informs the owner what content was removed, which policies it violated (for example adult content or graphic violence), and how it affects their channel. The organizations above may have many channels, and we may not be able to identify all of their channels or videos using their name alone. Those organizations would be in the best position to provide information about any actions that have been taken against their accounts.

**90. Does YouTube demonetize, block, down-rank, down-rate, shadowban, remove from auto-suggest, or otherwise limit take negative action against content posted by individuals or organizations who have spoken “hate speech” aside from the offending content?**

When content violates our hate speech policy, we’ll remove the content and send the creator an email to let them know. The first time a creator’s content violates our Community Guidelines, we send a warning with no penalty to their channel. After the first time, we issue a strike against their channel. Their channel will be terminated if they receive 3 strikes.

In addition, if we think content comes close to hate speech, we may limit YouTube features available for that content. This means that content will remain available on YouTube, but the watch page will no longer have comments, suggested videos, or likes, and will be placed behind a warning message. These videos are also not eligible for ads. Having features disabled will not add a strike to the channel.

**91. The vast majority of YouTube’s content is provided by individuals and creators of small, low cost content. Moreover, most of YouTube is viewed without a subscription. In both of these regards, YouTube is much different than broadcasters or streaming networks like Netflix or Hulu.**

- a. Who are YouTube’s primary competitors in its market?
- b. What percentage of the market does YouTube hold?
- c. How many unique viewers does YouTube have per day?
- d. How many hours of video is served by YouTube each day?
- e. How many ads are served by YouTube each day?

We compete against a wide range of other companies that allow users to share videos and original content—from Vimeo to Twitter to Snap, TikTok, Facebook, and Instagram—as well as against other content streaming services—like Hulu, Netflix and Comcast. Advertisers have a multitude of options that compete with YouTube for serving video ads to users, as video ads are shown on many news websites, social media sites, mobile applications, streaming services, connected TVs, and more. There are always new companies emerging in this market. Publicly available statistics regarding viewers and ads on YouTube are available at <https://www.youtube.com/about/press/>.

**92. What percentage of individuals employed by Alphabet, Google, LLC or any subsidiary of Google, LLC excluding YouTube, LLC:**

- a. Self-identify or are registered as Democrats?
- b. Self-identify or are registered as Republicans?
- c. Self-identify as “liberal?”
- d. Self-identify as “conservative?”
- e. Have donated to:
  - (1) The Democratic National Committee, the Democratic Congressional Campaign Committee, or the Democratic Senatorial Campaign Committee?
  - (2) A candidate running for office as a Democrat?
  - (3) A cause primarily affiliated with or supported by the Democratic Party?
  - (4) A cause primarily affiliated with or supported by liberal interest groups?
  - (5) A political action committee primarily advocating for the Democratic Party, Democratic candidates or office-holders, or causes primarily supported by the Democratic Party?
  - (6) The Hillary Clinton Presidential Campaign?
  - (7) The Republican National Committee, the National Republican Senate Committee, or the National Republican Congressional Committee?
  - (8) A candidate running for office as a Republican?
  - (9) A cause primarily affiliated with or supported by the Republican Party?
  - (10) A cause primarily affiliated with or supported by conservative interest groups?
  - (11) A political action committee primarily advocating for the Republican Party, Republican candidates or office-holders, or causes primarily supported by the Republican Party?
  - (12) The Donald Trump Presidential Campaign?
- f. Worked on, interned for, or volunteered for a Democratic candidate campaigning for elected office or an elected Democratic official or candidate?

**g. Worked on, interned for, or volunteered for a Republican campaigning for elected office or an elected Republican official or candidate?**

Google is a multi-national public company with over 100,000 employees located around the world. Our employees represent a broad spectrum of political views, and Google does not discriminate or retaliate against employees for holding or expressing conservative, liberal, or other political viewpoints. Conservative points of view, like others, are welcome at Google and across our products. We also understand that user trust is paramount, and have developed and will continue to develop systems to ensure our products are free of political bias. We do not maintain information regarding our employees such that it could be readily queried to answer questions like those listed above.

**93. What percentage of individuals employed in managerial roles by Alphabet, Google, LLC or any subsidiary of Google, LLC excluding YouTube, LLC:**

- a. Self-identify or are registered as Democrats?
- b. Self-identify or are registered as Republicans?
- c. Self-identify as “liberal?”
- d. Self-identify as “conservative?”
- e. Have donated to:
  - (1) The Democratic National Committee, the Democratic Congressional Campaign Committee, or the Democratic Senatorial Campaign Committee?
  - (2) A candidate running for office as a Democrat?
  - (3) A cause primarily affiliated with or supported by the Democratic Party?
  - (4) A cause primarily affiliated with or supported by liberal interest groups?
  - (5) A political action committee primarily advocating for the Democratic Party, Democratic candidates or office-holders, or causes primarily supported by the Democratic Party?
  - (6) The Hillary Clinton Presidential Campaign?
  - (7) The Republican National Committee, the National Republican Senate Committee, or the National Republican Congressional Committee?
  - (8) A candidate running for office as a Republican?
  - (9) A cause primarily affiliated with or supported by the Republican Party?
  - (10) A cause primarily affiliated with or supported by conservative interest groups?
  - (11) A political action committee primarily advocating for the Republican Party, Republican candidates or office-holders, or causes primarily supported by the Republican Party?
  - (12) The Donald Trump Presidential Campaign?

- f. Worked on, interned for, or volunteered for a Democratic candidate campaigning for elected office or an elected Democratic official or candidate?**
- g. Worked on, interned for, or volunteered for a Republican campaigning for elected office or an elected Republican official or candidate?**

As described above, as a company with over 100,000 employees and whose policies prohibit discrimination based on political viewpoints, we do not maintain information regarding our employees such that it could be readily queried to answer questions like those listed above.

**94. What percentage of individuals employed as executives by Alphabet, Google, LLC or any subsidiary of Google, LLC excluding YouTube, LLC:**

- a. Self-identify or are registered as Democrats?**
- b. Self-identify or are registered as Republicans?**
- c. Self-identify as “liberal?”**
- d. Self-identify as “conservative?”**
- e. Have donated to:**
  - (1) The Democratic National Committee, the Democratic Congressional Campaign Committee, or the Democratic Senatorial Campaign Committee?**
  - (2) A candidate running for office as a Democrat?**
  - (3) A cause primarily affiliated with or supported by the Democratic Party?**
  - (4) A cause primarily affiliated with or supported by liberal interest groups?**
  - (5) A political action committee primarily advocating for the Democratic Party, Democratic candidates or office-holders, or causes primarily supported by the Democratic Party?**
  - (6) The Hillary Clinton Presidential Campaign?**
  - (7) The Republican National Committee, the National Republican Senate Committee, or the National Republican Congressional Committee?**
  - (8) A candidate running for office as a Republican?**
  - (9) A cause primarily affiliated with or supported by the Republican Party?**
  - (10) A cause primarily affiliated with or supported by conservative interest groups?**
  - (11) A political action committee primarily advocating for the Republican Party, Republican candidates or office-holders, or causes primarily supported by the Republican Party?**
  - (12) The Donald Trump Presidential Campaign?**



- f. **Worked on, interned for, or volunteered for a Democratic candidate campaigning for elected office or an elected Democratic official or candidate?**
- g. **Worked on, interned for, or volunteered for a Republican campaigning for elected office or an elected Republican official or candidate?**

As described above, as a company with over 100,000 employees and whose policies prohibit discrimination based on political viewpoints, we do not maintain information regarding our employees such that it could be readily queried to answer questions like those listed above.

**95. What percentage of individuals employed by YouTube, LLC:**

- a. **Self-identify or are registered as Democrats?**
- b. **Self-identify or are registered as Republicans?**
- c. **Self-identify as “liberal?”**
- d. **Self-identify as “conservative?”**
- e. **Have donated to:**
  - (1) **The Democratic National Committee, the Democratic Congressional Campaign Committee, or the Democratic Senatorial Campaign Committee?**
  - (2) **A candidate running for office as a Democrat?**
  - (3) **A cause primarily affiliated with or supported by the Democratic Party?**
  - (4) **A cause primarily affiliated with or supported by liberal interest groups?**
  - (5) **A political action committee primarily advocating for the Democratic Party, Democratic candidates or office-holders, or causes primarily supported by the Democratic Party?**
  - (6) **The Hillary Clinton Presidential Campaign?**
  - (7) **The Republican National Committee, the National Republican Senate Committee, or the National Republican Congressional Committee?**
  - (8) **A candidate running for office as a Republican?**
  - (9) **A cause primarily affiliated with or supported by the Republican Party?**
  - (10) **A cause primarily affiliated with or supported by conservative interest groups?**
  - (11) **A political action committee primarily advocating for the Republican Party, Republican candidates or office-holders, or causes primarily supported by the Republican Party?**
  - (12) **The Donald Trump Presidential Campaign?**
- f. **Worked on, interned for, or volunteered for a Democratic candidate campaigning for elected office or an elected Democratic official or candidate?**

- g. Worked on, interned for, or volunteered for a Republican campaigning for elected office or an elected Republican official or candidate?**

We do not maintain information regarding our employees such that it could be readily queried to answer questions like those listed above.

**96. What percentage of individuals employed as managers by YouTube, LLC:**

- a. Self-identify or are registered as Democrats?**
- b. Self-identify or are registered as Republicans?**
- c. Self-identify as “liberal?”**
- d. Self-identify as “conservative?”**
- e. Have donated to:**
  - (1) The Democratic National Committee, the Democratic Congressional Campaign Committee, or the Democratic Senatorial Campaign Committee?**
  - (2) A candidate running for office as a Democrat?**
  - (3) A cause primarily affiliated with or supported by the Democratic Party?**
  - (4) A cause primarily affiliated with or supported by liberal interest groups?**
  - (5) A political action committee primarily advocating for the Democratic Party, Democratic candidates or office-holders, or causes primarily supported by the Democratic Party?**
  - (6) The Hillary Clinton Presidential Campaign?**
  - (7) The Republican National Committee, the National Republican Senate Committee, or the National Republican Congressional Committee?**
  - (8) A candidate running for office as a Republican?**
  - (9) A cause primarily affiliated with or supported by the Republican Party?**
  - (10) A cause primarily affiliated with or supported by conservative interest groups?**
  - (11) A political action committee primarily advocating for the Republican Party, Republican candidates or office-holders, or causes primarily supported by the Republican Party?**
  - (12) The Donald Trump Presidential Campaign?**
- f. Worked on, interned for, or volunteered for a Democratic candidate campaigning for elected office or an elected Democratic official or candidate?**
- g. Worked on, interned for, or volunteered for a Republican campaigning for elected office or an elected Republican official or candidate?**

We do not maintain information regarding our employees such that it could be readily queried to answer questions like those listed above.

**97. What percentage of individuals employed as executives by YouTube, LLC:**

- a. Self-identify or are registered as Democrats?**
- b. Self-identify or are registered as Republicans?**
- c. Self-identify as “liberal?”**
- d. Self-identify as “conservative?”**
- e. Have donated to:**
  - (1) The Democratic National Committee, the Democratic Congressional Campaign Committee, or the Democratic Senatorial Campaign Committee?**
  - (2) A candidate running for office as a Democrat?**
  - (3) A cause primarily affiliated with or supported by the Democratic Party?**
  - (4) A cause primarily affiliated with or supported by liberal interest groups?**
  - (5) A political action committee primarily advocating for the Democratic Party, Democratic candidates or office-holders, or causes primarily supported by the Democratic Party?**
  - (6) The Hillary Clinton Presidential Campaign?**
  - (7) The Republican National Committee, the National Republican Senate Committee, or the National Republican Congressional Committee?**
  - (8) A candidate running for office as a Republican?**
  - (9) A cause primarily affiliated with or supported by the Republican Party?**
  - (10) A cause primarily affiliated with or supported by conservative interest groups?**
  - (11) A political action committee primarily advocating for the Republican Party, Republican candidates or office-holders, or causes primarily supported by the Republican Party?**
  - (12) The Donald Trump Presidential Campaign?**
- f. Worked on, interned for, or volunteered for a Democratic candidate campaigning for elected office or an elected Democratic official or candidate?**
- g. Worked on, interned for, or volunteered for a Republican campaigning for elected office or an elected Republican official or candidate?**

We do not maintain information regarding our employees such that it could be readily queried to answer questions like those listed above.

**98. How many employees has Alphabet, Google, LLC or any of its subsidiaries other than YouTube, LLC hired that previously worked for 501(c)(3) or 501(c)(4) nonprofits? Please list the names of the 501(c)(3) and 501(c)(4) organizations employees have previously worked for and the number of employees for each.**

We do not maintain information regarding our employees such that it could be readily queried to answer this question.

**99. How many employees has YouTube, LLC hired that previously worked for 501(c)(3) or 501(c)(4) nonprofits? Please list the names of the 501(c)(3) and 501(c)(4) organizations employees have previously worked for and the number of employees for each.**

We do not maintain information regarding our employees such that it could be readily queried to answer this question.

**100. Google, LLC is entitled to contribute money to federal and State elections both as a function of the First Amendment as well as federal and State law. Including its parent, subsidiaries, affiliates, as well as political action committees, partnerships, councils, groups, or entities organized with either a sole or significant purpose of electioneering, making political contributions to issue advocacy, candidates, or political parties, or of bundling or aggregating money for candidates or issue or party advocacy, whether disclosed by law or not, and during primary elections or general elections, how much money has Google contributed to:**

- a. All federal, State, and local candidates for office from 2008 to present?
- b. All national party committees?
- c. Of that amount, how much was to:
  - (1) The Democratic National Committee?
  - (2) The Democratic Senatorial Campaign Committee?
  - (3) The Democratic Congressional Campaign Committee?
  - (4) The Republican National Committee?
  - (5) The National Republican Senate Committee?
  - (6) The National Republican Congressional Committee?
- d. All political action committees from 2008 to present?
- e. All issue-advocacy campaigns, including initiatives, referenda, ballot measures, and other direct-democracy or similar lawmaking measures?
- f. Candidates running for President:
  - (1) In 2008?
    1. How much of that money was to the Democratic candidate?
    2. How much of that money was to the Republican candidate?
    3. How much of that money was to other candidates?
  - (2) In 2012?

1. How much of that money was to the Democratic candidate?
  2. How much of that money was to the Republican candidate?
  3. How much of that money was to other candidates?
- (3) In 2016?
1. How much of that money was to the Democratic candidate?
  2. How much of that money was to the Republican candidate?
  3. How much of that money was to other candidates?
- (4) In 2020?
1. How much of that money was to candidate seeking the Democratic nomination?
  2. How much of that money was to President Trump?
- g. Candidates running for the U.S. Senate: (for special or off-year elections going forward, please group donation amounts with the next nearest cycle)
- (1) In 2008?
1. How much of that money was to Democratic candidates?
  2. How much of that money was to Republican candidates?
  3. How much of that money was to other candidates?
- (2) In 2010?
1. How much of that money was to Democratic candidates?
  2. How much of that money was to Republican candidates?
  3. How much of that money was to other candidates?
- (3) In 2012?
1. How much of that money was to Democratic candidates?
  2. How much of that money was to Republican candidates?
  3. How much of that money was to other candidates?
- (4) In 2016?
1. How much of that money was to Democratic candidates?
  2. How much of that money was to Republican candidates?
  3. How much of that money was to other candidates?
- (5) In 2018?
1. How much of that money was to Democratic candidates?
  2. How much of that money was to Republican candidates?
  3. How much of that money was to other candidates?
- h. Candidates running for the U.S. House of Representatives: (for special or off-year elections going forward, please group donation amounts with the next nearest cycle)
- (1) In 2008?
1. How much of that money was to Democratic candidates?
  2. How much of that money was to Republican candidates?
  3. How much of that money was to other candidates?
- (2) In 2010?
1. How much of that money was to Democratic candidates?

2. How much of that money was to Republican candidates?
3. How much of that money was to other candidates?
- (3) In 2012?
  1. How much of that money was to Democratic candidates?
  2. How much of that money was to Republican candidates?
  3. How much of that money was to other candidates?
- (4) In 2016?
  1. How much of that money was to Democratic candidates?
  2. How much of that money was to Republican candidates?
  3. How much of that money was to other candidates?
- (5) In 2018?
  1. How much of that money was to Democratic candidates?
  2. How much of that money was to Republican candidates?
  3. How much of that money was to other candidates?
- i. Candidates running for Governor:
  - (1) In 2008?
    1. How much of that money was to Democratic candidates?
    2. How much of that money was to Republican candidates?
    3. How much of that money was to other candidates?
  - (2) In 2010?
    1. How much of that money was to Democratic candidates?
    2. How much of that money was to Republican candidates?
    3. How much of that money was to other candidates?
  - (3) In 2012?
    1. How much of that money was to Democratic candidates?
    2. How much of that money was to Republican candidates?
    3. How much of that money was to other candidates?
  - (4) In 2016?
    1. How much of that money was to Democratic candidates?
    2. How much of that money was to Republican candidates?
    3. How much of that money was to other candidates?
  - (5) In 2018?
    1. How much of that money was to Democratic candidates?
    2. How much of that money was to Republican candidates?
- j. How much of that money was to other candidates?

The most up-to-date information regarding your questions is available in the Public Policy Transparency Report, available at <https://www.google.com/publicpolicy/transparency>. As noted in that report, Google has chosen not to use corporate resources to make independent expenditures or fund electioneering communications in support of, or opposition to, a federal, state or local candidate's election. Where permissible by law, Google makes direct corporate contributions to non-federal entities, including state and local candidates, committees, and organizations.

The Public Policy Transparency Report details contributions from NetPAC, Google's federal political action committee, as well as corporate political contributions to 527 organizations, state and local candidates, parties, and committees.

**101. Has Google, LLC or any of its subsidiaries ever dismissed, demoted, fired, or otherwise taken adverse employment action against an employee on the basis of political speech that the employee undertook within the company, on YouTube, or elsewhere? If so, please list each such incident. If federal law requires YouTube to keep any of these incidents or their details confidential, please disclose as much information as federal law permits and anonymize the instances through appropriate pseudonyms and redactions. If Google does so, please note the legal basis for such redaction or confidentiality.**

We believe that diversity in all forms, including viewpoint, makes us stronger. Our mission—to make the world's information accessible and useful—is not Democratic or Republican, liberal, conservative, progressive or libertarian. With over 100,000 Google employees around the world, we have a wide-range of political views represented. Conservative points of view, like others, are welcome at Google. We are always working to ensure that employees feel comfortable expressing their views and that they do so in a constructive and respectful way. We do not take actions against employees based solely on the exercise of political speech.

**102. Has Google, LLC or any of its subsidiaries ever dismissed, demoted, fired, or otherwise taken adverse employment action against an employee on the basis of that employee's discrimination against content or viewpoint within the company or within a Google service or platform? If so, please list each such incident. If federal law requires Facebook to keep any of these incidents or their details confidential, please disclose as much information as federal law permits and anonymize the instances through appropriate pseudonyms and redactions. If YouTube does so, please note the legal basis for such redaction or confidentiality.**

As discussed in response to question 101, we believe that diversity in all forms, including viewpoint, makes us stronger. We have rules and policies regarding how employees should interact respectfully with each other. We also we have processes and procedures in place that would prevent employees from being able to impact Google's services or platforms on their own. It is unclear what is meant by taking action "on the basis of that employee's discrimination against content or viewpoint within the company or within a Google service or platform," and what kind of actions this would encompass.

**103. Google's former CEO and Executive Chairman through 2018 was an adviser to Hillary Clinton's 2016 presidential campaign.**

- a. Did any other board members or executives advise the Hillary Clinton presidential campaign? If so, please identify these individuals and their positions with Google.
- b. Were any other board members or executives invited to advise the Donald Trump presidential campaign? If so, please identify these individuals and their positions with Google.
- c. Did any Google board members or executives formally advise the Donald Trump campaign?

Google prides itself on having a diverse staff, including at our board level. No person at Google, including members of our board, is permitted to manipulate our products for politically partisan purposes. Our board members and executives may engage in personal political activity outside of their work for Google. We do not require executives or board members to inform us of this type of personal activity.

**104. Yes or no: Do Google’s corporate values, beliefs, priorities, or opinions in any way affect or alter, in whole or in part, the information presented to users who query Google Search, including:**

- a. Any “organic” search results,
- b. Any summary of any “organic” search results,
- c. Any sponsored or promoted results,
- d. Any OneBox recommended answers,
- e. Any advertisements,
- f. Any promotion of Google products or services,
- g. The order or ranking of any results, or
- h. The visual presentation of any results?

Google’s business model depends on us being a useful and trustworthy source of information for everyone, so we have a natural, long-term incentive to prevent anyone from compromising the integrity of any of our products. We want to create tools that are useful to all Americans and go to extraordinary lengths to build our products and enforce our policies in an analytically objective, apolitical way.

Larry Page once described the perfect search engine as understanding exactly what you mean and giving you back exactly what you want. In order to meet this goal, and as described in our How Search Works page, available at <https://www.google.com/search/howsearchworks/>, we consider factors such as the relevance, the quality of content, and the usability of the website to deliver the best content to users. Additionally, there are circumstances in which Google may remove Search results, such as child sexual abuse imagery or links to spam or malware, which reflect judgments that we have made regarding protecting our users. But we strive to ensure that these circumstances are narrow, and we describe those decisions further at <https://www.google.com/search/howsearchworks/mission/open-web/>.



- 105. A recent article in Wired Magazine states that Google employees are “obligated to dissent’ if they [see] something they disagree[] with, and they [are] encouraged to ‘bring their whole selves’ to work rather than check their politics and personal lives at the door.” Does Google actively encourage Google employees to employ their political values, to the extent practicable, when executing their job duties?**
- a. If so, describe the methods that Google uses to encourage employees to “bring their political views to work” by employing their beliefs in such a way.**
  - b. If not, what policies or practices does Google have in place to ensure that Google employees understand that this “obligation to dissent” does not authorize employees to execute their job duties in a way that advances a partisan or political agenda?**

We have a long-standing policy of supporting open conversations and dialogue among our employees, which is a value rooted in Google’s early days. But we have also implemented guidelines to ensure that internal conversations are respectful, productive, and relevant to our jobs.

Most importantly, Google recognizes that our business model depends on being a useful and trustworthy source of information. We design products with extraordinary care to prevent bias. For example, no single employee can implement changes to a product, like Search, and we rigorously conduct experiments prior to implementing new changes. And we take care to ensure that our users can trust us to be a non-biased source of information.

- 106. In determining whether to terminate an individual’s employment or otherwise subject an individual to an adverse employment action, will Google take into account in any way lawful speech on political or social issues in any of the following fora:**

- (1) An internal memo to all Google employees?**
- (2) An internal memo to a select internal mailing list?**
  - 1. If so, does it matter whether the mailing list is opt-in?**
- (3) A conversation with a willing participant who is a Google employee?**
- (4) A conversation with a willing participant who is not a Google employee?**
- (5) A post or video on a personal social media account?**
  - 1. If so, does it matter whether the post or video was protected, concealed, or otherwise rendered private by the owner or user of the content or service?**
- (6) An open letter to the public?**
- (7) An op-ed or similar writing in an online or print publication?**

With over 100,000 employees around the world, all political views are represented at Google. Conservative points of view, like others, are supported at Google. We are always working to ensure that employees feel comfortable expressing their views and that they do so in a constructive and respectful way. But like any workplace, that does not mean anything goes. For example, employees can't cross the line by harassing or bullying other employees. We would, of course, take into consideration the context of an employee's activities, when considering whether their activities violate our policies regarding employee conduct.

**107. In August 2017, Google fired James Damore for violating its code of conduct after Damore submitted an internal memorandum criticizing the company's hiring practices and arguing that the company's political bias created a negative work environment.**

- a. **Does Google permit employees to believe that some portion of the career differences between men and women are the result of differing choices between the sexes?**
- b. **Does Google permit employees to criticize its "diversity" efforts as being racist against whites and Asians or sexist against men?**
- c. **Is Google aware of any internal memoranda or other internal statements, written or oral, directed to management or large numbers of Google employees that criticized the company's hiring practices for failing to achieve an insufficiently diverse—in terms of gender, sexual orientation, race, nationality, or any Title VII protected class—workforce?**
  - (1) **Have any of these individuals been terminated or subject to any adverse employment action as a result of their speech?**
  - (2) **Have Google employees called for any of these individuals to be terminated or subject to any adverse action as a result of their speech?**

As discussed above, we have a long-standing policy of supporting open conversations and dialogue among our employees, which is a value rooted in Google's early days. But we have also implemented guidelines to ensure that internal conversations are respectful, productive, and relevant to our jobs. Portions of Mr. Damore's memo violated our Code of Conduct and crossed the line by advancing harmful stereotypes. We don't tolerate that type of behavior, regardless of the employee's political views.

**108. Please list and describe all mandatory trainings that Google employees are required to undergo and the topics involved in each, including any trainings on sexual harassment, unconscious bias, racial privilege, and inclusivity.**

In accordance with applicable law, Google requires all non-managerial employees to take sexual harassment training annually, and all managers are required to complete a Managing within the Law course, which includes training on sexual harassment.

- 109. Please list and describe all optional recommended trainings that Google employees are required to undergo and the topics involved in each, including any trainings on sexual harassment, unconscious bias, racial privilege, diversity, and inclusivity.**

Google recommends employees complete unconscious bias training, which includes material on recognizing bias, equity, and inclusion.

- 110. Does Google employ an Implicit Association Test in its trainings regarding unconscious bias, racial privilege, diversity, or inclusivity?**
- a. Is Google aware that the Implicit Association Test’s creators have repeatedly disavowed the ability of that test to predict individual-level decisions based on the outcome of that test?**
  - b. Is Google aware that the Implicit Association Test suffers from a “crisis of replicability”—that is, that the results obtained in such a test are difficult or impossible to replicate?**
    - (1) Is Google aware that whether a given finding can be replicated is an important metric in determining whether an underlying test is scientifically accurate?**

Google references the Implicit Association Test in some of its training materials, but does not require employees to take the Implicit Association Test.

- 111. Do any of the materials Google uses in any of these trainings identify different preferences, values, goals, ideas, world-views, or abilities among individuals on the basis of race, sex, sexual orientation, or place of origin? If so, please list each and include those materials.**

Google does not use any materials that identify different preferences, values, goals, ideas, world-views, or abilities among individuals on the basis of race, sex, sexual orientation, or place of origin.

- 112. Google is located in a very liberal part of the country, and disproportionately employs individuals who are significantly more liberal than the median American.**
- a. Does Google have any training specifically aimed at discouraging political, ideological, or partisan bias in decision-making by its employees?**
  - b. Does Google have any training specifically aimed at discouraging political, ideological, or partisan bias in hiring, retention, promotion, and firing of its employees?**
  - c. Does Google have any training specifically aimed at discouraging political, ideological, or partisan bias in the monitoring, curation, or supervision of content, users, or advertisements?**

Google has more than 100,000 employees around the world—and throughout the United States—who represent a wide-range of backgrounds and political viewpoints. One value central to Google, and emphasized from the highest level of the company, is respect—including respect towards one another as colleagues. We ask that Googlers treat each other with dignity, recognizing that we come from different places and hold different views, and noting that each of us has earned the opportunity to work to fulfill Google’s mission. We also emphasize the importance of respecting our users, and recognizing that our products must be for everyone. We know Google’s business model depends on being a useful and trustworthy source of information. Billions of people use our products to find information, and we feel a deep sense of responsibility to help our users, of every background and belief, in finding the high-quality information they need to better understand the topics they care about.

**113. Please list the names of any third-party organizations or vendors that Google uses to facilitate its trainings.**

The vendors and law firms that assist with trainings depend on our needs for a particular training and where the expertise for that need exists. This means that we use a variety of vendors and law firms, consistent with their expertise.

**114. In the last five years, how many discrimination complaints has Google received from Christians on the basis of religious discrimination in whole or part? Please indicate how these complaints were resolved.**

We have not had any EEOC complaints filed in the last five years that allege discrimination on the basis of an employee’s Christian identity.

**115. Yes or no: Does Google offer any compensation, amenities, trainings, or similar services to its employees on account of their race, sex, sexual orientation, or religious affiliation? If so, please list each and whether all other races, sexes, etc. are provided the same compensation, amenity, etc.**

We strive to treat all of our employees equally. While employees of different backgrounds may take advantage of different opportunities, such as taking time off for religious holidays, or attending trainings, participating in career development programs, or joining affinity groups directed to people with certain identities, our employees are treated equally, subject to the requirements of employment laws in the various countries and localities where they are employed.

**116. Regardless of place of incorporation, does Google consider itself an American company?**

As I stated in my opening remarks, Google is a proud American company.

**117. When Google makes policy decisions, are American citizens the company's top priority? If not, what is Google's top priority when it comes to policy decisions?**

Google has always been committed to being a responsible corporation. We take into consideration numerous factors when making policy decisions, including our users around the world, our employees, and our shareholders.

**118. Since 2014, the PRC government has held a World Internet Conference. Charles Smith, the co-founder of the non-profit censorship monitoring website GreatFire, described foreign guests of the Conference as "complicit actors in the Chinese censorship regime [that] are lending legitimacy to Lu Wei, the Cyberspace Administration of China and their heavy-handed approach to Internet governance. They are, in effect, helping to put all Chinese who stand for their constitutional right to free speech behind bars."**

- a. **How many Google employees have attended the PRC's World Internet Conference?**
- b. **Have any Google employees ever participated on any panels or advisory committees that are held or have been established by the World Internet Conference?**
  - (1) **If so, please list the employees and the panels or high-level advisory committees they have participated on.**
  - (2) **Has Google assisted other countries in designing regimes to monitor or censor any product or service offered by Google? If so, which countries, and under what circumstances? Please describe each.**
  - (3) **Has Google assisted other countries in designing regimes to monitor or censor any search engine or social media platform (including any video-sharing platform) not owned or operated by Google?**
- c. **Has Google ever provided any financial support to the World Internet Conference? If yes, please provide and itemize all financial support that has been provided to the World Internet Conference.**

Google cares deeply about the open internet and bringing access to the world's information to everyone. We have a long history of engaging with countries to advocate for more access to information and against government censorship, including with China. As discussed in response to question 27, we take a very cautious approach in China, and our presence is carefully scoped. Google has on occasion attended and participated in the World Internet Conferences. As we consider ways to serve users in China consistent with Google's values, we'll continue to consult with policy makers, our employees, and other key stakeholders.

- 119. Has Google ever temporarily shut down or limited access to any of its products or services within a country or a specific geographic area at the request of a foreign government or agency, including but not limited to, the PRC, the Islamic Republic of Iran, Syria, the Russian Federation, and Turkey?**
- a. If so, please describe each instance in which Google has complied with a foreign government’s request to censor content or users, the requesting government, the provided justification for the government request, and a description of the content requested to be removed.**
  - b. Please describe what if any policies Google has in place governing Google’s responses to government censorship requests.**

Google has a long history and strong reputation of pushing back against censorship requests from governments. Like all companies, Google must comply with local laws, including laws on content removals, in countries where we have a presence. When we receive content removal requests, our teams carefully evaluate each request and review the content in context in order to determine whether or not it should be removed due to violation of local law or our content policies. We always assess the legitimacy and completeness of a request. For example, in order for us to evaluate a request, it must be in writing, as specific as possible about the content to be removed, and clear in its explanation of how the content violates local law. We publish a Transparency Report about government requests to remove content that is available at <https://transparencyreport.google.com/government-removals/overview>.

- 120. Google’s business model relies on using the immense amount of data that Google collects to sell targeted advertising.**
- a. To Google’s best approximation, what is the total value of all user information that Google has acquired or to which Google has access?**
  - b. How does Google categorize individual pieces of information for purposes of monetizing that information?**
  - c. What external controls restrict how Google monetizes, sells, rents, or otherwise commercializes an individual’s information? Please include (separately) any laws that Google views as applicable, any injunctions presently binding Google, any regulations directing how Google may monetize information, and any publicly available, independent audits of how Google monetizes information.**
  - d. What internal controls restrict how Google monetizes, sells, rents, or otherwise commercializes an individual’s information? Please include (separately) any internal policies, statements of ethics or principles, directives, guidelines, or prohibitions that Google routinely applies in determining whether to use an individual’s personal information for commercial gain.**

Google doesn't assign a value to "all user information that Google has acquired or to which Google has access." Our reputation for appropriately handling users' data and users' trust in us is incredibly valuable to our company. We do not sell users' personal information, and we provide users control over their data, how they share it, and to what extent their data can be used to target ads to them.

**121. Yes or no: Does Google collect data from individuals who do not have a Google account or device?**

**a. If so, has Google gained consent from these individuals to collect and use this personal data?**

Many Google Services, such as Search, Maps, or YouTube, are usable by individuals who do not have a Google Account. As our Privacy Policy explains, the data Google collects depends on which Google Services are used and how users manage their privacy controls. Whether and what types of data are collected also depends on whether or not users have created and are signed in to a Google Account when they interact with our services.

When an individual uses our services without a Google Account, we store the data we collect with unique identifiers (such as a cookie ID) tied to the browser, application, or device with which the user accesses our services, similar to the vast majority of Internet services. Even without having a Google Account, users can manage some of the ways data is collected, by configuring their browser settings (e.g., to clear or block all or some cookies) or device settings. As described in our Privacy Policy, we provide individuals who use Google Services without a Google Account with additional ways to manage the data Google associates with their browser or device. For example, users without a Google Account can choose whether their Search activity is used to offer more relevant Search results and recommendations by visiting <https://google.com/history/optout>.

**122. Yes or no: Does Google collect data from individuals when they are not signed into a Google account?**

**a. If so, has Google gained consent from these individuals to collect and use this personal data?**

Many Google services, such as Search, Maps, or YouTube, are usable by individuals who are not signed in to a Google Account. As described in response to question 121, our Privacy Policy explains that the data we collect depends on which Google services are used and how users manage their privacy controls. Whether and what types of data are collected also depends on whether or not users have created and are signed in to a Google Account when they interact with our services.

When a user is not signed in to a Google Account, we store the data we collect with unique identifiers tied to the browser, application, or device with which the user accesses the service.

The controls described above in response to question 121 for users without a Google Account are identical to those available to users who have not signed in to a Google Account.

- 123. To the extent that Google collects and uses data from individuals who have registered for a Google account, has Google obtained those individuals' informed consent on an opt-in basis prior to acquisition of that data.**
- a. If so, please provide the basis for concluding that data was acquired on an informed consent basis.**
  - b. If so, please provide the basis for concluding that users opted-in to Google's collection and commercialization of their data.**

Google has been a leader in providing users with transparency, choice, and control over their data. We provide users with numerous opportunities to learn about the types of data we collect, including through our Privacy Policy, available at <https://policies.google.com/privacy>, and our numerous videos that help users understand it (also available at <https://policies.google.com/privacy>).

When creating a Google Account, users are presented with Google's Privacy Policy, as well as a number of privacy settings that explain how Google may collect and use data. We provide the user with opportunities to exercise granular choices, including to consent to personalized advertising. At the end of the Google Account creation flow, users are asked to tick a box indicating the user's understanding that their data will be processed in accordance with the settings selected and the Privacy Policy.

Once a user has created a Google Account, Google provides a range of settings and tools to enable the user to easily control how their data is collected, used, retained, deleted, and shared. As one example, signed-in users can find their privacy and security settings in a centralized place—My Account (<http://myaccount.google.com/>). For example, in My Account, users can download a copy of their personal information, access or delete their Google activity, view or modify the information Google uses to personalize their ads, or disable personalized ads entirely. In 2018, Google Account had over 2.5 billion visits.

- 124. Yes or no: Does Google provide users a reasonable opportunity to learn what information has been collected about them by Google. If yes, please describe how.**

As described in response to question 123, Google is committed to transparency and has been a leader in this area. Our Privacy Policy, available at <https://policies.google.com/privacy>, has been recognized as best in class, but we recently updated it to make it even easier for users to understand with informative videos that explain our data practices and privacy controls. We also made our privacy controls immediately accessible from the Privacy Policy so that users can make choices as they learn about how we may collect, use, and share data.



We also seek to go beyond the Privacy Policy to actively inform users in the products themselves about our data uses and their choices, so that users can understand the privacy implications of their choices in context.

As another example, we created a tool called Privacy Checkup (<http://myaccount.google.com/privacycheckup/>) that allows users to walk through key data collection activities and important privacy controls in minutes. The Privacy Checkup tool makes it easy for users to manage the types of data Google collects, to review what personal information users share with friends or make public, and to adjust the types of ads users would like Google to show them, including disabling personalized ads entirely. We also created Security Checkup (<https://myaccount.google.com/security-checkup>), which is designed to help users make informed decisions about security and privacy, including by identifying the apps that users authorized to access their data and letting them revoke that authorization. Through individual prompts and prominent service-wide promotions, we frequently remind users to take Privacy and Security Checkup so we can help our users keep their privacy and security choices up to date as their use of Google services changes over time.

- 125. Google offers a “takeout” page that purports to offer a complete view of the data collected or retained by Google that is associated with or tied to an individual user’s Google ID. Does the “takeout” page include all data that Google has collected or retained that could be associated with an individual user’s Google ID?**
- a. If not, what additional categories of data does Google collect or retain that could be associated with the individual’s user ID?**
  - b. If not, is any of this data unavailable to a user via Google “takeout”:**
    - (1) Used by Google to develop new products or services?**
    - (2) Used by Google in targeted advertising?**
    - (3) Sold to third-parties?**

Google’s data portability tool—GoogleTakeout (available at <https://takeout.google.com>)—is a market-leading product that allows users to export data stored in their Google Account to back it up or move it directly to other providers.

We are constantly adding new data to Takeout, which currently covers over 70 Google services. The service is focused on providing users with a machine-readable copy of data that is useful to them and likely to be compatible with other services.

Google does not sell personal information to advertisers or other third parties.

- 126. Does Google collect users’ audio or visual information for any reason whatsoever, or otherwise activate, monitor, or capture data from a microphone or camera from any of the following devices without the user’s**

**contemporaneous knowledge and express contemporaneous consent? If so, please list each and every instance under which Google does so.**

- a. Phone**
- b. Nest Doorbell**
- c. Nest Thermostat**
- d. Nest Hub**
- e. Google Home**
- f. Laptop**
- g. Desktop**
- h. Tablet**
- i. Any other electronic device**

Google has long been a leader in working to ensure users can understand and control what data they share and store with us. Where Google hardware includes microphones or cameras, and where users can interact with products like the Google Assistant, we have worked hard to offer an intuitive set of controls to ensure users understand how Google uses interaction data.

When users choose to interact with Google Assistant, the Assistant sends audio to Google after the device detects that interaction—for example, by detecting when they user says “Hey Google” or physically triggers the Google Assistant by pressing a button. In rare instances, the Google Assistant may experience what we call a “false accept.” This means that there was some noise or words in the background, or a physical interaction that our software interpreted to be the hotword (“Ok Google” or “Hey Google”). We work very hard to help to minimize false accepts, and have a number of protections in place. Audio clips from Assistant interactions are saved to a user’s Google Account when the user is signed-in, has enabled Web & App Activity, and has checked the box to opt in to saving voice and audio recordings. Even when users have opted in to saving their voice and audio recordings in their Google Account, they can also always delete individual recordings or all recordings.

For our connected Home devices, Google recognizes that users’ homes are special places where the privacy-conscious collection and use of data is particularly important. Evolving technologies like ambient sensors and voice assistants make Home more helpful, but they also raise privacy questions. We want our users and their families to feel comfortable using Google products, whether that’s at work, on mobile devices, or in the safety of their home. We recently published detailed privacy commitments governing our Home devices, including a commitment to clear indicators and explanations of when cameras or microphones are collecting and sending data to Google. You can review these privacy commitments at [https://store.google.com/us/category/google\\_nest\\_privacy](https://store.google.com/us/category/google_nest_privacy).

**127. Will Google commit to not using any of the devices listed in question 126 to gather such audio or visual information surreptitiously?**

Google is, and has always been, committed to transparency in how we collect user data, and we will continue that commitment. We recently published detailed privacy commitments for our suite of Home devices. You can review these privacy commitments at [https://store.google.com/us/category/google\\_nest\\_privacy](https://store.google.com/us/category/google_nest_privacy).

**128. On average, how many times per day does an Android device transmit data to Google?**

Android is an open-source platform that thousands of manufacturers around the world use. Android devices are not necessarily associated with Google, and, depending on the manufacturer, the apps on the device, and other features, may not transmit data to Google at all. Whether an Android device transmits data to Google, and how often it transmits data, depends on a number of factors, including what apps exist on the device and the user's settings.

**129. Yes or no: Is Google able to correspond physical location data that it collects from mobile devices to user names in the Google ecosystem?**  
**a. If so, does Google use or rely on this correspondence to develop products or services, or to buy, sell, or serve advertisements?**

As we explain in our Privacy Policy, we collect information about users' location when they use our services, which helps us offer features like driving directions or showtimes for movies playing near them. Depending on the products a user interacts with, and the settings they choose, Google may collect different types of location information, which is critical to making some services work and others more useful. Location data can come from real-time signals, like IP address or device location, or past activity on Google services, which we may use to tailor users' experiences. We provide detailed information about the types of location data we collect and how we use that data in our Privacy Policy and in our location technologies page at <https://policies.google.com/technologies/location-data>.

Depending on users' ads personalization settings, they may see ads based on their activity in their Google Account. Users have control over the data stored in their Google Account, and can turn off personalized ads at any time. When ads personalization is off, Google does not use the data stored in a user's Google Account to serve them personalized ads.

**130. Does any executive at Google possess, use, or benefit from any technology, whether hardware or software, that is not available or applicable to the general public and that in any way limits the amount of his or her personal data that Google may activate, monitor, or capture?**  
**a. If so, did Google or one of its affiliates or subsidiaries develop this technology?**

- b. If so, please state the type of hardware or software and the type of personal data that it prevents Google from activating, monitoring, or capturing.**

It is unclear what types of technology this question is intending to reference or what it may mean for Google to “activate” personal data. Google is committed to providing our users with strong privacy controls, regardless of whether they are employees of Google or not.

- 131. When an individual “uses incognito mode” in a Chrome browser, does Google activate, monitor, or capture data regarding that individual’s searches or websites visited?**

- a. If so, does Google correspond that data in any way with the individual’s Google ID, the IP address of the device, or any other identifier?**

Incognito mode in Chrome allows users to browse the internet without Chrome saving their browsing activity. Google provides users who seek to browse in Incognito mode with information regarding what information may still be captured while using this feature at <https://support.google.com/chrome/answer/7440301>. Additionally, history data stored about a user’s browsing behavior within a single Incognito session is not saved to their device or Google Account when they close that session, unless a user signed in to their Google account to use a web service while in Incognito mode.

- 132. To what extent is data gathered from an individual’s Gmail account used to target Google advertisements?**

As we announced in 2017, Google no longer scans users’ Gmail for the purposes of delivering ads. More information about that change can be found at <https://blog.google/products/gmail/g-suite-gains-traction-in-the-enterprise-g-suites-gmail-and-consumer-gmail-to-more-closely-align/>.

- 133. Does Google Ad Manager collect user data? If so, what data is collected, and does Google AdWords used that data?**

We take pride in our groundbreaking work to give users access and control over their data with tools such as My Account (<https://myaccount.google.com/>), Privacy Checkup (<https://myaccount.google.com/privacycheckup>), and Security Checkup (<https://myaccount.google.com/security-checkup>). We’ve also worked hard to make sure users understand why they are seeing certain ads. When users see an ad from Google’s network, they can get more details about why that ad was shown by clicking on the info symbol ( ⓘ ) and choosing “Why This Ad.” Non-Google websites and apps that partner with Google have a similar feature under the label “Ad Choices.”

As with all of our user privacy controls, our goal is to make things as simple as possible while ensuring that users have meaningful control over their data. For websites that use Ad Manager, Google collects certain user data when its advertising servers receive a request from a user's device. This request is triggered by the user interacting with a third-party website or app that uses a Google advertising service. Depending on the publisher's settings, the user's preferences, and the device in question, the collected data may include the browser's request for an ad to be served on a non-Google website, the ad slot to be filled, system and device information, such as the device, browser version, operating system version, default language and screen size, IP address, location data, mobile network information, an identifier for the application, a resettable mobile advertising identifier (such as IDFA for iOS or AdID for Android), cookie information, and event data such as impression, click or conversion data.

Google Ad Manager collects data to provide the relevant services, including to serve and personalize ads (including remarketing), subject to the user's settings, to enable frequency capping (i.e., to ensure that users are not served the same ad multiple times), to enable sequential creative rotation (i.e., to show a set of ads to users in a specific sequence), and to measure ad performance (e.g., how many ads were served and how many clicks those ads received), and provide reporting, among other uses.

- 134. Does Google sell or share any user data with third-parties for any reason, including to facilitate the targeting of advertisements?**
- a. If so, what are Google's revenues from selling this data for each of the calendar years 1998 to 2018?**
  - b. If so, what is the fair market value of the data shared for each of the calendar years 1998 to 2018?**

Google does not sell users' personal information to anyone. We also do not share user data with third parties except as described in our Privacy Policy, such as when the user consents or with our service providers. Like other companies, Google may share pseudonymous data with advertisers for the purpose of facilitating real-time bidding for online advertisements, or to report on the performance of an ad campaign.

- 135. Yes or no: does Google employ facial-recognition technology?**
- a. If so, does Google collect user data using facial-recognition technology?**
  - b. If so, does Google collect data on individuals who lack a Google account using facial-recognition technology?**
  - c. If yes, does Google allow third-parties access to its facial-recognition technology or related information obtained as a result of the technology?**
  - d. If yes, does Google allow government entities access to its facial recognition technology and/or the information obtained as a result of the technology?**

- e. **To the extent that Google uses facial-recognition technology, what policies and procedures does Google have to safeguard information and data collected using that technology?**
- f. **Does Google offer individuals, whether registered users or not, any opportunity to not be subject to facial-recognition technology or to have data collected using facial-recognition technology deleted?**
- g. **Yes or no: Will Google commit to not using its facial-recognition technology to assemble data on individuals who have never affirmatively consented to having this technology used on them?**

We believe facial recognition technology merits careful consideration to ensure its use is aligned with our principles and values, and avoids abuse and harmful outcomes.

Recently we published our approach to facial recognition, building on our AI principles and responsible practices. You can review our approach to facial recognition at <https://ai.google/responsibilities/facial-recognition/>. Notice, consent, and control are among the five key dimensions in our consideration for development and deployment of facial related technologies. In addition, we look to incorporate technologies and techniques that consider user privacy and, where possible, enhance it. One example is Federated Learning, in which sensitive data stays on the device, while the software can still adapt and becomes more useful for everyone with use. You can learn more about Federated Learning at <https://federated.withgoogle.com/>.

Google does not currently offer general-purpose facial recognition APIs and has chosen not to do so before working through important technology and policy questions, including those regarding privacy and security.

**136. To the best of Google’s knowledge, does any foreign government currently have access, or did any foreign government previously have access, to any personal data activated, collected, or maintained by Google other than in a manner and to an extent already known to the public or to the United States government?**

We recognize the threats that state-sponsored cyber activity can pose to corporations like Google and our users. In 2010, we publicly disclosed an attack we found on our system that we believe targeted our intellectual property, as well as human rights activists. More information about our findings are available at <https://googleblog.blogspot.com/2010/01/new-approach-to-china.html>. We will continue to be vigilant about these types of threats, and work with law enforcement as appropriate.

**137. I anticipate that many of your answers to these questions for the record will in some way state that you cannot answer fully because the questions call for information that Google alone possesses.**

- a. Why are Google's Search algorithm(s) and index secret?
- b. Why are Google Search's webpage quality ratings secret?
- c. Why is Google's Top Stories content-suggesting algorithm(s) secret?
- d. Why is Google News's content-suggesting algorithm(s) secret?
- e. Why is YouTube's algorithm(s) secret?
- f. Why are Google and YouTube's editorial decisions secret?

We are committed to helping users, government, and academia understand how our products and policies work. We publish a significant body of information about the functioning of our tools and services, including websites describing how Google Search or Google News work (<https://www.google.com/search/howsearchworks/>). We also publish information on the processes we go through to update our ranking algorithms as well as the 160 page Search rater guidelines that guide each and every change to Google Search. And we have posted over 600 videos on the Webmaster Help YouTube channel.

Like most companies, we protect our algorithms for multiple reasons, including protecting our trade secrets and preventing intellectual property theft, including from foreign companies against whom we would have limited means to protect ourselves. Exposing our code would magnify security risks, such as hacking and fraud through gaming the system. And our actual code is highly unlikely to help the vast majority of users understand more about our processes and policies than the other ways we have promoted transparency around our work.

**138. To what extent will Google make public any of the criteria on which the algorithms referenced in question 137 rely?**

As described in question 137, we have invested heavily in being as transparent as we can about our products. For example, we have a How Search Works site (<https://www.google.com/search/howsearchworks/>), which provides details about how we rank results and make improvements. We publish our 160-page Search rater guidelines. We also provide significant resources to website owners, including providing extensive tools and tips to empower webmasters to manage their Search presence as well as informing website owners in advance of significant, actionable changes to our Search algorithms.

**139. To what extent will Google make public any changes that it makes to the algorithms referenced in question 137 or any similar algorithms?**

As described above, we already make public how we consider and make changes to our algorithms, including, where appropriate, informing webmasters in advance of those changes.

**140. It has been reported that Facebook conducts numerous social experiments on its users, examining everything from the effects of Facebook on voter turnout to the effects of Facebook on the mood of its users.**

- a. Will Google commit to not experimenting on its users without express, informed consent in advance?
- b. Will Google commit to making the results of any such experiments known publicly?
- c. Will Google commit to refrain from experimenting on human subjects?
- d. If not, will Google commit to ensuring that any experiments that it intends to run involving humans are precleared by the Independent Review Board and its ethical standards?

Google's mission is to help organize the world's information, and we are committed to being a useful resource to our users. To do this, we work hard to identify and return the most relevant and authoritative information in the quickest way possible. We also need feedback from our users to determine if our tools are effective. Like many companies, we try to learn from how users interact with our systems in an effort to improve our user interfaces. From time to time we look at user information to ensure that our services are working as intended and to inform improvements to our services—for example, understanding which search terms are most frequently misspelled helps us improve spell-check features used across our services. We have always been very conscious of our role and the trust users place in us, and we strive to never violate that trust. We will continue to be transparent about these uses of data.

**141. Does Google comply with all U.S. laws, regulations, and executive orders regarding sanctions?**

- a. In particular, does Google provide goods or services to any of the following? If so, what goods or services does Google provide to:
  - (1) Hezbollah?
  - (2) Any media affiliates, official or unofficial, of Hezbollah?
  - (3) The government of Iran?
  - (4) Ali Khamenei?
  - (5) Javad Zarif?
  - (6) The Office of the Supreme Leader of Iran?
  - (7) Any media affiliates, official or unofficial, of the Office of the Supreme Leader of Iran?
  - (8) Hamas?
  - (9) Any media affiliates, official or unofficial, of Hamas?
  - (10) The Islamic Republic of Iran Broadcasting (IRIB)?
- b. If the answer to any subpart of question 141(a) is yes, under what legal authority does Google provide such goods or services?

Google is fully committed to compliance with U.S. sanctions, including those that apply to the entities and individuals listed in your inquiry. Google has rigorous policies and procedures, including specific export compliance language in our Terms of Service (available at <https://policies.google.com/terms?hl=en-US>), that prevent engaging in impermissible transactions with sanctioned parties. We require users to agree to our Terms of Service which



state that users “may use our Services only as permitted by law, including applicable export and re-export control laws and regulations.”

Additionally, Google includes contract language in its agreements, as appropriate, that addresses trade sanctions compliance and requires contracting parties to commit to complying with the sanctions. In the event that Google identifies non-compliance, it takes swift measures to address such non-compliance, including account termination.

Google is fully committed to compliance with U.S. sanctions and we look forward to continuing to work with Congress, the Department of Treasury and law enforcement on these efforts.

**SENATOR MAZIE K. HIRONO**

**Questions for the Record for Karan Bhatia,**  
**Vice President, Government Affairs & Public Policy for Google LLC**

1. **With regard to YouTube’s content moderation practices:**
  - a. **How many content moderators does YouTube employ worldwide? Please provide the total number content moderators along with a breakdown by country of residence, by state of residence (if country of residence is the United States), and by employment status (i.e., how many content moderators are YouTube employees v. contractors).**
  - b. **Please describe the training provided to content moderators.**
  - c. **What is the average salary of a content moderator?**
  - d. **On average, how many hours per week does a content moderator work?**
  - e. **On average, how many YouTube videos does a content moderator review per week?**
  - f. **On average, how much time does a content moderator have to determine if a video violates the YouTube Community Guidelines?**
  - g. **What percentage of content moderators have reported a diagnosis of or symptoms of post-traumatic stress disorder (PTSD), drug abuse, anxiety, and/or another psychological disorder as a result of their work?**

Google has hired over 10,000 employees in a variety of roles to help enforce our policies and review flagged content. The health and well-being of the individuals who work to tackle particularly sensitive content is of paramount importance to Google, and we are a leader in this space. We’ve developed groundbreaking automated tools to reduce the impact of content exposure to reviewers, and have wellness counseling resources available to every member of our team, including vendors. We also host a wellness practices summit for the industry to help develop best practices in this area. Also, Google designs and implements programs to protect staff and equip them with the right tools and support structures. This helps them prevent over-exposure, build resilience, recognize signs of stress and seek appropriate support and counselling as a matter of course. Our physical workspaces are also designed to prioritize well-being.

2. **Please explain Google’s process for proactively identifying content that may violate YouTube’s Community Guidelines, including any automated processes employed by Google such as hashing or machine learning.**

YouTube has always used a mix of technology and human review to flag content and enforce its guidelines. YouTube has invested in powerful new machine learning technology to scale the efforts of our human moderators to take down videos and comments that violate our policies. Our machine learning systems are faster and more effective than ever before and are helping our human review teams remove content with speed and volume that could not be

achieved with people alone. Finding all violative content on YouTube is an immense challenge, but we see this as one of our core responsibilities and are focused on continuously working towards removing this content before it is widely viewed. For example, over 87% of the 9 million videos we removed in the second quarter of 2019 were first flagged by our automated systems. And improvements in our automated flagging systems have helped us detect and review content even before it's flagged by our community. In the second quarter of 2019, more than 80% of those auto-flagged videos were removed before they received a single view. More information about our efforts are available in our Transparency Report at <https://transparencyreport.google.com/youtube-policy/removals?hl=en>.

**3. Once content has been flagged as possibly violating YouTube's Community Guidelines—whether through Google's internal processes or through the efforts of users—please explain the process for determining whether the content should be removed, age restricted, demonetized, or have other action taken.**

When we detect a video that violates our Guidelines, we remove the video and apply a strike to the channel. Channels will be terminated if they receive three strikes. We also terminate entire channels if they are dedicated to posting content prohibited by our Community Guidelines or contain a single egregious violation, like child sexual abuse material. The vast majority of attempted abuse comes from bad actors trying to upload spam or adult content. For example, over 90% of the channels and over 65% of the videos that we removed in the second quarter of 2019 were removed for violating our policies on spam or adult content.

**4. In his written testimony, Andy Parker identified a particular video of his daughter's murder that had remained available on YouTube even though his team had reported it as containing "[v]iolent or repulsive content." I understand that Google did not remove the video from YouTube until shortly before the July 16 hearing. When asked why the video had not been removed when reported by Andy's team, your team replied that it had not been reported as a copyright violation.**

**YouTube's Community Guidelines include a prohibition on content that is "[v]iolent or graphic content." The guidelines state: "It's not okay to post violent or gory content that's primarily intended to be shocking, sensational, or gratuitous."**

**Please explain why the video identified in Mr. Parker's written testimony—which included footage of his daughter's murder—was not removed for containing "[v]iolent or graphic content" when it was flagged as such on May 30, 2019.**

Our heartfelt condolences go to Mr. Parker for his loss and for the ongoing issues that the video of this horrific event has caused him and his family. We have always worked to develop and improve policies regarding the content allowed on YouTube. This June, we announced new policies regarding hateful and violent events on YouTube (the announcement is available at <https://youtube.googleblog.com/2019/06/our-ongoing-work-to-tackle-hate.html>). These new policies are designed to also protect victims of violence and would apply to videos like

those of Mr. Parker’s daughter. In addition, as discussed above, YouTube automatically blocks duplicate reuploads of content removed for violation of the Community Guidelines, and has also implemented fingerprint matching for non-exact matches of the video content filmed by Ms. Parker’s murderer.

We also have developed a new mechanism for family members to identify videos including footage of their loved ones during the moment of death or being critically injured. They can contact us directly for this issue, using this form: <https://support.google.com/youtube/contact/momentdeath>.

We initially left the video up, as it was contained in news footage of the incident. Upon further review, we have determined that it violated our policies and we have removed it. We are continually working to improve our policies and have learned from this issue.

**5. YouTube’s Community Guidelines suggest that “[v]iolent or graphic content” may not run afoul of the guidelines if it is included in “a news or documentary context.”**

**Please explain how Google makes a determination whether content that is violent or graphic may nonetheless meet the YouTube Community Guidelines because it is in “a news or documentary context,” including but not limited to the identity of the individual or organization posting the content in this determination.**

When videos document graphic events that are nonetheless newsworthy, we have to make case-by-case determinations as to whether the videos should be permitted on YouTube. These determinations are not always easy. But, for example, videos documenting police brutality, or human rights violations in Syria, have appeared on YouTube, and have resulted in important dialogues and conversations about policies in the United States and throughout the world. The context of the video is important, and we consider the title and description of the video when making policy determinations. We do not, however, consider political affiliation when making these determinations.

**6. Following the hearing, my staff provided Google with approximately 67 links to videos of Alison Parker’s murder that were on YouTube at the time. Some of the videos were copies of the original WDBJ broadcast of the murder; others were copies of the footage filmed by the shooter; others included a side-by-side comparison of the two.**

**I understand that Google employs hashing technology to identify content—like the videos of Alison Parker’s murder—that violates YouTube’s Community Guidelines.**

- a. How many of the links provided by my staff had previously been flagged by Google’s hashing technology either for removal or for further review?**

- b. If any of the videos had previously been flagged by Google’s hashing technology, please explain why they were still available on YouTube by the date of the hearing.**
- c. If any of the videos had not previously been flagged by Google’s hashing technology, please explain (1) what prevented them from being flagged, and (2) what steps Google is taking to ensure similar videos are flagged in the future.**

Since the early days of YouTube, when we identify and remove a video that violates our policies, we have used MD5 hashing technology to prevent the reupload of duplicates of the removed video. The MD5 system automatically blocks exact matches of removed videos upon reupload to YouTube. That system operates on all of the videos of Ms. Parker’s murder that were removed for violating YouTube’s Community Guidelines.

In addition to hashing, for over two years, YouTube has used fingerprinting technology to automatically find non-exact matches of reuploads of the video filmed by Alison Parker’s murderer and direct matched videos for human review. Use of fingerprinting has resulted in the removal of over 120 reuploads of this content since it was first put in place in 2017.

Note that no technological solution is perfect, and YouTube continues to improve its ability to match content through its fingerprinting system. The fingerprint matching for this content will remain in place to identify any future uploads of the content.

**7. The approximately 67 videos for which my staff provided links to Google included titles such as:**

- **“Reporter And Cameraman Shot Dead On Duty Whilst Live On CBS TV In Virginia [RAW-VIDEO];”**
- **“Virginia Reporter and Cameraman Killed Live On TV (Uncut Footage);”**
- **“SHOT DEAD on LIVE TV |Female Reporter & Camera Man KILLED Live on Live TV\_{VIDEO RAW FOOTAGE} !!!;”**
- **“Raw footage of WDBJ7 Shooting Live TV;”**
- **“Shooting on Live TV [ Side by Side ] Shooter and News Report Video;”** and
- **“Two reporters Killed UNCENSORED shooter Camera.”**

**As these titles and the descriptions accompanying the videos make clear, the individuals posting the videos made no effort to hide the content of the videos.**

**Please explain what role, if any, the titles and descriptions accompanying YouTube videos play in Google’s efforts to proactively identify content that violates YouTube’s Community Guidelines, including any automated efforts to identify such content. If a video’s title and/or description is not considered, please explain why it is not.**

We take into consideration titles and descriptions, as well as the broader context of a video, when deciding whether it violates our policies. As we describe in our Help Center article, available at <https://support.google.com/youtube/answer/6345162>, context is particularly important when it involves graphic content; and we review details like descriptions of videos when determining whether the video violates our policies. We direct YouTube creators to ensure their videos have a clear title or description indicating that their videos are reporting on or documenting, for example, a violent event, rather than promoting it. And, as discussed above, in June, we changed our policies to include victims of major violent events as a protected group under our new hate content policies, available at <https://support.google.com/youtube/answer/2801939>. We believe this new policy will help content reviewers make decisions regarding removing these types of videos.

- 8. To the extent Google has determined that any of the videos identified by my staff did not violate YouTube's Community Guidelines, please explain in detail why each such video does not violate the guidelines.**

None of the videos your staff flagged for us are currently available to the public.

- 9. When Mr. Parker approached Google about having videos of the original WDBJ broadcast of his daughter's murder removed from YouTube, he was told it was his responsibility to search for and report the videos for violating his copyright. He continues to get that direction from Google to this day.**

**Does it remain Google's position that it is the responsibility of Mr. Parker to search for and report videos of his daughter's murder as violating YouTube's Community Guidelines? If it remains Google's position, please explain whether Google is (1) unwilling or (2) incapable of identifying and removing the videos itself and why that is the case. If it is no longer Google's position, please explain when Google's position changed and what steps Google has taken to identify and remove the videos itself.**

Our heartfelt condolences go to Mr. Parker and his family. As discussed above, in June, we changed our policies to include victims of major violent events as a protected group under our new hate content policies, available at <https://support.google.com/youtube/answer/2801939?hl=en>. We believe this new policy will help content reviewers making decisions regarding removing these types of videos.

Copyright law, unfortunately, was not designed to address issues like this one. The Digital Millennium Copyright Act requires that copyright holders identify each piece of content that violates their copyright. While we have developed tools to help copyright holders identify potential violative videos at scale, we also understand that for families like Mr. Parker's, these tools are incredibly burdensome.

We will continue to review our enforcement policies to improve in this area.

- 10. During your testimony, you discussed videos that had been posted to YouTube that claimed that Alison Parker’s murder was a hoax. You testified that “those videos . . . violate our policies and we have indeed taken all of those down.”**

**Assuming it is true that Google has proactively taken down all videos posted to YouTube that claimed that Alison Parker’s murder was a hoax, why has Google been unable to take similar action for (1) videos of the original WDBJ broadcast of Alison Parker’s murder (for which Andy Parker holds the copyright and which otherwise violate the YouTube Community Guidelines’ prohibition against “[v]iolent and graphic content”); and (2) videos of the murder as filmed by the shooter (which violate the YouTube Community Guidelines’ prohibition against “[v]iolent and graphic content”)?**

None of the videos your staff flagged for us are currently available to the public.

- 11. YouTube has been used to spread graphic footage of many violent events, including Alison’s Parker’s murder; the mass shooting in Christchurch, New Zealand; and several ISIS executions.**

**When Google becomes aware of YouTube being used to spread violent and graphic footage of a particular event, does Google take addition steps beyond its normal content moderation practices to remove such footage? If so, please describe those steps in detail.**

Preventing the spread of this type of content is a priority for YouTube. We took the case of the mass shooting in Christchurch very seriously, and are working to do everything we can to ensure users are not exposed to this kind of terrorist content, regardless of ideology.

In the case of Christchurch, we were in regular contact with the New Zealand Police, the Digital Safety Team at the Department of Internal Affairs, and the Prime Minister’s Office. We identified shooter’s channel and removed it before any more content was uploaded. We launched authoritative ranking to make sure people seeking info got videos from reliable sources. We quickly detected copies of aftermath footage and created fingerprints to catch third-party reuploads, and we coordinated with other companies within hours of the attack.

Although the initial video was not live streamed on YouTube, we have introduced additional safeguards like requiring creators to have 1,000 subscribers in order to mobile livestream. We already had introduced steps to help confirm that a creator is a human and have put in place a 24-hour wait period for certain creators that only have a small number of subscribers. We also have an emergency imminent physical harm flag so viewers can alert us if anything goes wrong in a livestream and we can take action quickly.

**12. Recognizing the important—and sometimes difficult—decisions it must make around content moderation, Facebook has begun the process of establishing an independent oversight board to review and rule on content moderation decisions.**

**Will Google establish a similar independent oversight board to review and rule on content moderation decisions with respect to YouTube? Why or why not?**

We are always considering options to improve our policies and processes. We are aware of Facebook's recent announcement regarding its intent to set up an independent oversight board. We will continue to monitor its launch and performance as well as continue to review other options to expand and build upon our investments in this area.

**13. Over the course of this year, two investigations shined a spotlight on a few of the ways children are exploited on YouTube. First, *Wired* published a report on the way pedophiles used the comment section of YouTube videos to identify and share videos of children. Then, *The New York Times* published a piece on how YouTube's recommendation engine served as a roadmap for pedophiles to find videos of younger and younger girls, sometimes as young as 5- or 6-years old.**

**I understand that YouTube took some, limited action in response to the reports. But *post hoc* actions like these are not enough.**

**What investment does Google make—in terms of money and manpower—to investigate potential misuse of its platforms to stop it as early as possible or prevent it entirely, particularly as it relates to protecting children?**

We are deeply committed to protecting children and families online, and have developed industry-leading technology to detect and prevent the sharing of child sexual abuse material. We've invested heavily in a number of technologies and efforts to protect young people on our platform, such as our CSAI Match technology, described further at <https://youtube.com/csai-match/>. We also work hard to enforce a strong set of policies to protect minors on YouTube, including those that prohibit exploiting minors, encouraging dangerous or inappropriate behaviors, and aggregating videos of minors in potentially exploitative ways. In the first quarter of 2019 alone, we removed more than 800,000 videos for violations of our child safety policies, the majority of these before they had ten views. Earlier this year, we also stepped up our enforcement efforts against inappropriate comments on videos featuring minors, to limit the risk of exploitation. Additionally, we implemented a classifier that helped us remove twice the number of violative comments. We are always working to improve our policies and tools in this area, and will continue to dedicate resources to tackling this problem.



- 14. Right-wing commentator Steven Crowder pursued a 2-year harassment campaign against journalist Carlos Maza, including the use of racial and homophobic slurs. Even though this was brought to YouTube’s attention, the company initially took no action. To explain the company’s inaction, YouTube CEO Susan Wojcicki was quoted as saying “if we took down that content, there would be so much other content that we need to take down.”**
- a. Is it Google’s position that a user can freely violate the YouTube Community Guidelines as long as other users are similarly violating the guidelines? If not, please explain Ms. Wojcicki’s statement.**
  - b. Please explain why it took YouTube so long to act against Mr. Crowder despite YouTube’s clear rules against harassment and cyberbullying.**

We took this issue very seriously and explained our process for evaluating the issue in a public blogpost, available at <https://youtube.googleblog.com/2019/06/taking-harder-look-at-harassment.html>. In the case of Crowder’s channel, a thorough review found that individually, the flagged videos did not violate our Community Guidelines. However, in the subsequent days, we saw the widespread harm to the YouTube community resulting from the ongoing pattern of egregious behavior, took a deeper look, and made the decision to suspend monetization. We understand that context is important and learned from this incident. We are always reviewing our policies and practices, and will continue to conduct broader reviews of the context and impact of YouTube Creators.

- 15. Section 230 of the Communications Decency Act provides companies like Google with broad—but not unlimited—immunity for third-party content they publish on the Internet. In a recent case before the U.S. Court of Appeals for the District of Columbia Circuit (*Marshall’s Locksmith Service Inc. v. Google, LLC*), the court held that Section 230 immunized Google from liability for publishing false location information for locksmith companies because Google search simply returned the information provided by those locksmith companies.**

**During oral argument, Google’s attorneys argued that Google’s immunity extended much farther and that Google would have been immune from suit in the case even if Google itself fabricated the location information. The court called the argument “remarkable.”**

**Is it, in fact, Google’s position that it remains immune from liability under Section 230 even if Google itself fabricates the information it returns in its search results? If not, how far does Google believe Section 230 immunity extends?**

Google’s mission is to organize the world’s information. Fabricating information is not in Google’s business interest nor is it in our culture. We agree with Judge Garland that Section 230 would not apply to addresses or other information in Search results that Google itself has fabricated, as that would not be information supplied by “another information content provider.” In the oral arguments before the D.C. Circuit, the attorney was responding to a

long and complicated hypothetical, and we do not believe the attorney intended to indicate that Section 230 would shield Google from such liability.

**SENATOR MARSHA BLACKBURN**

**Questions for the Record for Karan Bhatia,**  
**Vice President, Government Affairs & Public Policy for Google LLC**

- 1. Google has the ability to promote its own products and suppress competition through search prioritization. In 2015, Google prioritized its Google Plus search results over competing destination search websites such as Yelp and TripAdvisor.**
  - a. Does Google actively prioritize Google’s own local search results?**
  - b. If not, how does Google objectively determine that its own results are better than those offered by third parties it directly competes with across the web?**
  - c. Does Google prioritize search results from its advertising clients without disclosing the presence of sponsored content?**
  - d. How does Google determine which links are most relevant to a user’s search query?**
  - e. Do companies and organizations that advertise or otherwise do business with Google receive prioritized results through Google Search or Google Maps?**
  - f. Does Google tailor or censor search results for individual users based on data collected from them?**

As discussed in a related question from Senator Cruz, the openness of the Internet puts intense competitive pressure on Google to provide users with the best possible answers to their queries. Google’s indexes of online destinations are integrated as seamlessly as possible to make it easier for users to find the information that they are looking for. Specialized results and the information they contain, are not a separate “Google product.” Other search engines, such as Bing, DuckDuckGo, and Yahoo!, have for years enhanced their results with similar specialized formats, reflecting user demand for such enhancements.

Users can easily compare Google’s results with the results they get from other websites. If users, for example, believe that Amazon offers better information about shopping products, or that Yelp offers better information about local places, they can and do use other search products. They can also search for information or digital products and services without using Google at all through mobile apps, smart home devices, video gaming platforms, chat applications, social networks, and more. Given this competition, it is not in Google’s interest to make it more difficult for users to get the information that they want. Accordingly, the decision of whether and where to display specialized Search results is based on relevance to the user’s query.

We never provide special treatment to advertisers in how we rank their websites in our search algorithms, and nobody can pay us to do so. We only display ads if we believe they’re relevant

to the search terms the user entered, and when we do show ads, they're always labeled so users can tell them apart from search results.

- 2. In 2017, the European Commission fined Google €2.42 billion for abusing dominance as a search engine by giving advantage to its own comparison shopping service, Google Shopping. The Commission found that Google presented users searching for a product online with results that automatically displayed Google Shopping's results at the top of the page with pictures and pricing from a range of retailers. This resulted in the demotion of rival comparison-shopping sites. As a result, Google's promoted results receive considerably more visibility and traffic than their competitors do.**
  - a. How does Google determine when to generate and display results from Google Shopping on its main Google search engine?**
  - b. On average, how much more traffic does Google Shopping's results generate over links from other retailers when displayed in a Google search?**
  - c. On average, how much traffic does the first generic search result generate?**
  - d. How does the amount of traffic change for each generic search result further down the page?**
  - e. How does the amount of traffic change for links on each following page of search results?**
  - f. Are retailers' links able to reach the front page of a Google search without paying Google to promote their content?**
  - g. Please describe how Google ranks results to search queries on Google Shopping.**
  - h. Can retailers pay Google to have their products and service promoted in Google Shopping's search results?**
  - i. Does Google receive payment from retailers when their links appear in a Google search result?**
  - j. Does Google receive payment from retailers when users click on their links?**
  - k. Does Google receive payment from retailers when a purchase is made from a search that originated from Google?**
  - l. On average, how much does content on the front page of a Google search result generate in advertising and promotion revenue for Google?**
  - m. Does Google clearly identify paid results as advertisements or promotions to the user?**
  - n. How much revenue does Google generate from advertised and promoted search results?**

Google Shopping is designed to provide users the ability to search for and browse products from advertisers and merchants who have chosen to feature their products on our site. When

users browse Google shopping, we use a cart icon next to certain products to indicate that Google has a relationship with, and is compensated by, the merchants who offer these products. Commissions received from sales of these products, however, are not used to rank the results. Instead, ranking is based on a combination of advertiser bids and relevance, as determined by, for example, search terms and the user's activity. More information about how Google Shopping works is available at [https://support.google.com/googleshopping/answer/9128904?hl=en&ref\\_topic=9112782](https://support.google.com/googleshopping/answer/9128904?hl=en&ref_topic=9112782).

- 3. When the FTC investigated Google from 2011 to 2013, it discovered a business practice called “co-occurrence signals.” Instead of comparing its content with that of competitors, Google’s products would be “triggered” to appear above the ten blue links when the appearance of a competitor occurred in the PageRank results.**
  - a. Does Google still use any form of co-concurrence signals to suppress the competition in its search results?**
  - b. If Google no longer uses any form of co-occurrence signals, when did the practice end, and how long did it last?**
  - c. Please describe Google’s current policies on ranking search results from competitors.**
  - d. Did Google ever create a list of competitors its algorithm will target for suppression in its search results, and if so, which companies were included in that target list?**
  - e. Has Google ever used this practice to suppress search results from Yelp?**
  - f. Has Google ever used this practice to suppress search results from Trip Advisor?**
  - g. Has Google ever used this practice to suppress search results from Citysearch?**
  - h. Has Google ever used this practice to suppress search results from Angie’s List?**
  - i. Has Google ever used this practice to suppress search results from MapQuest?**
  - j. Has Google ever used this practice to suppress search results from ZocDoc?**
  - k. Has Google ever used this practice to suppress search results from Foursquare?**

We have always worked hard to provide our users with the most relevant Search results regardless of whether that information is derived from a Google or third-party product. Our algorithms are not designed to intentionally suppress a company in Search results simply because it is a competitor. We also rely heavily on extensive user testing to constantly improve our Search results and make them more relevant and useful. Moreover, we test thousands of changes to Search every year. Our rater guidelines are published externally and our raters are drawn from over 40 countries throughout the world.

Competition from other Internet sites puts intense competitive pressure on us to ensure users find what they are searching for—regardless of the source. Users can easily compare Google’s results with the results they receive from other websites. For example, if consumers find that Amazon does a better job providing them with information about products, then they will stop using Google and use Amazon instead. In fact, 55% of consumers start their product searches on Amazon and it is a robust competitor. For every type of query—travel, news, local, video, images, etc.—there are many different sites competing with Google to attract users. We must provide users with the information they seek or they will go to our competitors.

- 4. Google is often the first destination for many people when accessing the internet. Billions of people use Google to search for content and many of them have Google accounts. Google has the ability to collect data from each interaction of each user with its products.**
  - a. Does Google collect data from users logged into a Google account when they access websites through Google’s search engine? Please describe the kind of data that is collected from this kind of interaction.**
  - b. Does Google collect data from users logged into a Google account when they use Google’s products such as Photos, Drive, Gmail, Docs, and Hangouts? Please describe the kind of data that is collected from this kind of interaction.**
  - c. Does Google collect data from users not logged into a Google account when they access websites through Google’s search engine? Please describe the kind of data that is collected from this kind of interaction.**
  - d. Does Google collect data from users not logged into a Google account when they use Google’s other products? Please describe the kind of data that is collected from this kind of interaction.**
  - e. Does Google collect personalized data from users and keep records of data associated with specific users or individuals?**
  - f. Does Google use personalized data collected from specific individuals or users to determine personal preferences through predictive algorithms?**
  - g. Does Google tailor each user’s experience based on data collected from that user?**
  - h. Does Google tailor each user’s experience based on predicted preferences of that user?**

We describe the types of data that we collect from users in our Privacy Policy (<https://policies.google.com/privacy>). When signed-in users conduct searches on Google, we may collect, for example, the user’s search query, IP address and the URL they select on the Search results page. When users interact with other Google products and services, Google may collect additional information such as content they create, upload, or receive from others when using our services. This includes things like emails users write and receive, photos and

videos they save, and documents and spreadsheets they create. We collect this information to ensure our services function properly, to improve and create new services, and to provide users a more personalized experience. Signed-in users can view, manage, and delete their Google Activity in their Google Account under My Activity (<https://myaccount.google.com/>). For users that are not signed in to Google, we may still collect certain information such as IP addresses and store it with unique identifiers tied to the browser, application, or device the user is using. This helps us do things like maintain a user's language preferences across browsing sessions. Also, like most internet companies, Google uses cookies to deliver a better experience for users when they visit our websites. A user does not need to be logged in to have a cookie placed on their computer. We provide written explanations and a video explaining our use of cookies, available at <https://policies.google.com/technologies/cookies>.

**5. Does Google use data collected from its users to determine any of the following qualities, traits or preferences of individuals or users? If yes, how does Google further utilize this information to serve ads related to housing purchases or financial products, including but not limited to, mortgages, student loans, refinancing options, or any other related categories?**

- a. Age
- b. Sex
- c. Ethnicity
- d. Nationality
- e. Political preference
- f. Political party affiliation
- g. Occupation
- h. Socioeconomic status
- i. Religion

We document collection of data regarding users in our Privacy Policy, available at <https://policies.google.com/privacy>. With respect to the above signals, advertisers may use age, sex, household income, industry affiliation (e.g., finance, consulting, etc.—but not specific occupation), and political preference (the latter of which may be used to serve U.S. political ads) for ads personalization purposes on Google's advertising platforms. Google requires advertisers to comply with all laws with respect to the use of our advertising platforms, including all applicable anti-discrimination laws. In addition, advertisers are not permitted under Google's advertising policies, as detailed at <https://support.google.com/adspolicy/answer/6015406>, to include content in their advertisements that promotes discrimination against individuals on the basis of their race or ethnic origin, religion, disability, age, nationality, veteran status, sexual orientation, gender, gender identity, or another characteristic that is associated with systemic discrimination or marginalization.

More information regarding our policies specifically related to financial products is available at <https://support.google.com/adspolicy/answer/2464998>.

6. Does Google use data collected from its users or any determined qualities or preferences to filter, promote, suppress, or otherwise censor content that is able to be viewed or accessed by the user? If yes, please describe how content viewed by a user is affected by this tailoring process.
  - a. Does Google censor or promote news stories based on determined user preferences?
  - b. Does Google censor or promote search results based on determined user preferences?
  - c. Does Google censor or promote shopping products based on determined user preferences?
  - d. Does Google censor or promote image results based on determined user preferences?
  - e. Did or does Google collaborate with any individuals or organizations in determining what content Google removes, downgrades, conceals or otherwise censors?

Google has become a trusted source for searches on the internet because we work hard to provide our users with useful and trustworthy sources of information and to ensure that the most relevant results are surfaced on Search, including in Shopping, News, and Image results. Google's Search ranking is based on over 200 factors that interact in complex ways, and we continuously work on ensuring that the most relevant results are surfaced. We are transparent about our ranking, including about the fact that we conduct rigorous testing of the relevance of our results—270,000 tests and updates last year alone resulting in 2,400 improvements—and with public guidelines describing how we assess top results, available at <https://www.google.com/search/howsearchworks/>.

7. Has Google ever removed, downgraded, concealed, or otherwise censored content associated with any of the following news sources? If yes, please describe the content that was targeted, or otherwise censored.
  - a. MSNBC
  - b. CNN
  - c. The Associated Press
  - d. Breitbart News Network
  - e. Salon
  - f. National Review
  - g. Townhall
  - h. Huffpost
  - i. The Washington Post
  - j. The New York Times
  - k. The Wall Street Journal
  - l. The Washington Times
  - m. Fox News



- n. **The Daily Beast**
- o. **Buzzfeed**
- p. **The New York Post**
- q. **The New York Daily News**
- r. **Vice**
- s. **Slate**
- t. **USA Today**
- u. **Vox**
- v. **The Blaze**
- w. **The Daily Wire**
- x. **Bloomberg**
- y. **National Public Radio**
- z. **One America News**

There are limited reasons why Google may remove a news article or other content from our Search results. We may do so in order to comply with a court order or local law, such as the Right to Be Forgotten in the European Economic Area (EEA), or if it violates the policies listed at <https://support.google.com/websearch/answer/2744324> and <https://support.google.com/news/publisher-center/answer/6204050>. We do not remove content based on political affiliation.

**8. Does Google participate or cooperate with censorship conducted by foreign governments?**

- a. **Please describe any policies in place governing Google's responses to foreign government censorship requests.**
- b. **On what basis does Google decide to honor a foreign government's request to block, promote, suppress or otherwise censor content?**

Courts and government agencies around the world regularly request that we remove information from Google products. They may ask us to remove or review content for many reasons. Some requests allege defamation, while others claim that content violates local laws prohibiting hate speech or adult content, for example. We follow processes to ensure that each request cites an applicable legal basis, provides the exact content at issue, and describes how the content violates the law. We review these requests closely to determine if content should be removed because it violates a cited law or our product policies, and will take appropriate action when necessary.

Google is also a member of the Global Network Initiative and has made the commitment to, and follows, the best practices for protecting freedom of expression and human rights on our platform and across the globe. More information about the Global Network Initiative is available at <https://globalnetworkinitiative.org/>.

- 9. Does Google provide tools or special procedures for foreign governments seeking to conduct censorship?**
- a. If yes, please describe the tools or special procedures made available to foreign governments and how it could impact access to content through Google.**
  - b. Does Google assist foreign governments in attempts to monitor users and their internet activity?**
  - c. Does Google share or sell data collected from users to foreign governments?**

Google has a long history and strong reputation of pushing back against censorship requests from governments.

Government agencies, courts, and parties in civil litigation regularly ask technology and communications companies to turn over user data. We disclose information about the number and type of requests we receive from governments in our Transparency Report, available at <https://transparencyreport.google.com/user-data/overview>. We receive content removal requests through a variety of avenues and from all levels of government, including court orders, written requests from national and local government agencies, and requests from law enforcement professionals. We do not honor requests that have not been made through the appropriate channels.

Governments cite various reasons such as defamation, privacy, and even copyright laws when asking Google to remove content from our services. Our teams evaluate each request and review the content in context in order to determine whether or not content should be removed due to violation of local law or our content policies. We always assess the legitimacy and completeness of a request. For example, in order for us to evaluate a request, it must be in writing, as specific as possible about the content to be removed, and clear in its explanation of how the content is illegal. As mentioned previously, we publish a Transparency Report about government requests to remove content that is available at <https://transparencyreport.google.com/government-removals/overview>.