

NATIONAL CENTER ON SEXUAL EXPLOITATION

Established 1962

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PATRICK A. TRUEMAN, ESQ.
Former Chief, Child Exploitation and Obscenity
Section, U.S. Department of Justice

February 1, 2018

Ms. Susan D. Wojcicki, Chief Executive Officer
Mr. Robert Kyncl, Head of Content & Business Operations
Mr. Neal Mohan, Chief Product Officer
Ms. Julie Supan, Senior Director of Marketing
YouTube
901 Cherry Avenue
San Bruno, CA 94066

RE: Distribution of Sexually Exploitive Materials

Dear Mses. Wojcicki, and Supan, and Messrs. Kyncl, and Mohan:

We are writing to express our grave concern regarding YouTube's online facilitation of sexually exploitive and graphic videos.

In today's #MeToo culture, where sexual harassment and assault are rampant, corporations like YouTube have a renewed corporate responsibility to refrain from normalizing or promoting material that promotes sexual exploitation. While YouTube is fixing problems ad hoc after concentrated media attention, the website does not do enough to proactively remove sexually exploitive content and it forces users to go through a rigorous process if they want to report the content for removal.

For these reasons, the National Center on Sexual Exploitation plans to place YouTube on its 2018 Dirty Dozen List, where YouTube shares space with bad corporate actors such as the sex trafficking and prostitution website Backpage.com.

We are writing to ask that YouTube automatically turn on Safe Search for YouTube users so that users have to opt-in to more graphic content. We also ask that YouTube improve the ease and access of reporting videos, better review all monetized videos, and extend the AdWords policy prohibiting profits from sexually exploitive content to YouTube, and that YouTube extend image filtering software which YouTube currently uses to flag potential child pornography (i.e. child sexual abuse images) to flag all adult pornographic videos.

YouTube's Current Policy on Nudity and Sexual Content

YouTube's policy is as follows:

"Sexually explicit content like pornography is not allowed. Videos

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containing fetish content will be removed or age-restricted depending on the severity of the act in question. In most cases, violent, graphic, or humiliating fetishes are not allowed to be shown on YouTube.

A video that contains nudity or other sexual content may be allowed if the primary purpose is educational, documentary, scientific, or artistic, and it isn't gratuitously graphic. For example, a documentary on breast cancer would be appropriate, but posting clips out of context from the same documentary might not be. Remember that providing context in the title and description will help us and your viewers determine the primary purpose of the video."

YouTube's Failure to Properly Enforce Its Own Policies

In late 2017, YouTube came under scrutiny for hosting disturbing videos that targeted children, often with children's characters put in sexually charged or violent situations, many of which were monetized. YouTube stated that it removed these ads from approximately 2 million videos and shut down over 50,000 channels that featured this kind of content. Reports also recently surfaced that simple searches on YouTube like "how to have" would autocomplete with child sex themes.

While we commend YouTube for its efforts to resolve these specific issues, we see a broader theme of YouTube failing to proactively enforce its policies. Instead, YouTube seems to rely on users to report problems.

When users must act as moderators, they must first watch the explicit content and then report exact time stamps with descriptions. The main problem with this established procedure for content removal is that users must first be exposed to the harmful content and then they must continue to view the offensive material as they alert Google about the violation. Many of the explicit videos on the site have hundreds of thousands and even millions of views because Google refuses to improve this process and instead facilitates further exploitation by making their viewers their Terms of Use enforcers.

Often, the audience viewing this material is comprised of children. Pornography, and other sexually graphic material, has a profound negative impact on the development of children and exposure puts them at greater risk for falling victims of exploitation themselves.

Ads on Explicit Videos and Lack of Enforcement for Celebrity Partners

Sexually explicit videos on YouTube often amass many views, becoming eligible for lucrative pre-roll video ads that make YouTube and the Uploading Channel lots of money.

It also appears that Google is willing to let the Terms of Use slide for celebrities who upload content that is in direct violation. Beyoncé, Justin Timberlake, and Robin Thicke are just a few examples of celebrities who have amassed millions of views (and money for Google) with music

^{1 &}quot;Nudity and Sexual Content - YouTube Help." Google, support.google.com/youtube/answer/2802002?hl=en.

² Kulwin, Noah. "YouTube Kills Ads on 50,000 Channels as Advertisers Flee over Disturbing Child Content." *VICE News*, 27 Nov. 2017, news.vice.com/en_us/article/5955xd/youtube-kills-ads-on-50000-channels-as-advertisers-flee-over-disturbing-child-content.

³ Warzel, Charlie. "YouTube's Search Autofill Surfaced Disturbing Child Sex Results." *BuzzFeed*, www.buzzfeed.com/charliewarzel/youtubes-search-autofill-is-surfacing-disturbing-child-sex?utm_term=.klKkjz3BMZ#.sdPWL184pv.

videos that include full frontal nudity. Community Guidelines must apply to the entire community on YouTube, no matter how rich or famous someone might be.

When you turn on TV, you are not barraged with massive amounts of this kind material. Why is that when you open YouTube you're flooded with suggestions to watch explicit sexual videos, even when typing in innocent searches? Given the popularity, quantity, and reach of content uploaded to the website, Google's YouTube has a social responsibility to increase and improve efforts to curb sexual exploitation.

Requests to Google's YouTube:

After being placed on the National Center on Sexual Exploitation's Dirty Dozen List in 2014, GooglePlay instituted policies that prohibit pornographic apps in their app store and removed all apps in violation. NCOSE was glad to publicly commend Google for its leadership at this time, and we would like to do so again should YouTube make these vital improvements:

- 1. Turn Safe Search and Restricted Mode on automatically for all YouTube users, so that they have to opt-in for more graphic or adult content, instead of being automatically bombarded with sexually exploitive material.
- 2. Improve the ease and access of reporting videos that violate its Terms of Use.
- 3. Apply the same image filtering software currently used to identify child pornography to flag all forms of adult pornography or sexualized nudity as well.
- 4. Develop a more thorough review process for channels applying to monetize their videos.
- 5. Extend the AdWords policy to YouTube and refuse to profit from sexually exploitive content.
- 6. Update YouTube to work more efficiently with 3rd party filters.
- 7. Most importantly, we call on Google to use its creativity and immense talent to develop effective solutions for this growing problem.

YouTube and Google employ some of the brightest and best talents in the world, and we ask that you use this leadership to join with us to oppose sexual exploitation. We would welcome a meeting or conference call to discuss these issues further, you can reach us a 202-393-7245 or public@ncose.com.

Respectfully,

Patrick Trueman, Esq. President & CEO

National Center on Sexual Exploitation

Dawn Hawkins
Senior Vice President

Senior Vice President & Executive Director National Center on Sexual Exploitation