



**Written Comments of David Lieber
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Hearing on Sexual Exploitation Online
Suffolk University Law School
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Google appreciates the opportunity to submit written comments regarding the problem of online sexual exploitation. Attorney General Coakley has been a strong leader on this important issue and we strongly support her efforts to reduce online sexual exploitation. Likewise, Google is sensitive to these issues, and we have implemented policies that significantly reduce the likelihood of advertisements for escort services, prostitution, and related content (“prohibited sexual services”) on our network.

Google’s advertising platforms are oriented toward both advertisers and website publishers. The primary platforms currently utilized by advertisers and website publishers are AdWords, the Google Display Network, and AdSense. Across these platforms, Google has implemented and refined policies that bar advertisements for prohibited sexual services and thus minimize opportunities for online sexual exploitation.

I. Google AdWords

AdWords is a service that enables companies to place advertisements on Google.com and throughout Google’s Display Network. Advertisements on Google.com appear as sponsored links both above and to the right of natural search results.

Google prohibits the promotion of escort services, prostitution, and related content (“prohibited sexual services”) through AdWords. Our AdWords policy concerning adult sexual services articulates the types of services that may not be advertised through AdWords. These include:

- escorts and adult services
- prostitutes or call girls
- discreet, VIP, or intimate companionship services
- intimate and erotic massage services

Notably, these are just examples; Google reserves the right to prohibit

advertisements for similar activities. Advertisers who violate this policy are subject to a broad array of sanctions, including disapproval of specific advertisements, warnings to advertisers, and account termination.

Google employs a variety of methods to prevent advertisements featuring prohibited sexual services from being placed through AdWords.

- We prohibit advertisers to bid on certain keywords that are most likely to trigger advertisements for prohibited sexual services.
- Advertisements featuring words and phrases that likely promote prohibited sexual services are flagged for manual review. These advertisements are not allowed to appear until they have been reviewed by an AdWords reviewer and deemed compliant with our policies.
- We periodically conduct reviews to gauge the success of our policies and determine what further measures are necessary to block advertisements that feature prohibited sexual services. In some instances, we look at the content of a landing page that users are directed to when they click on sponsored links at Google.com. If the content of the landing page promotes prohibited sexual services, we remove the advertisement from AdWords. The reviews we conduct often lead to changes based on new tactics that rogue advertisers utilize to place advertisements featuring prohibited sexual services.

Rogue advertisers often attempt to circumvent our AdWords policies regarding prohibited sexual services. In response to such attempts, we have augmented our filtering process and increased manual reviews of keyword triggers and advertisement text that may promote prohibited sexual services. Although our efforts to block the display of advertisements that promote prohibited sexual services have largely been successful, we are engaged in a cat-and-mouse game with rogue advertisers, many of whom are persistent in their efforts to violate our policies and evade detection.

II. Google Display Network

Google's AdWords policies concerning prohibited sexual services also apply across Google's Display Network. Google's Display Network offers advertisers a broader array of advertising formats, including text, image, rich media, and video, and includes Google-owned platforms. For example, advertisers that wish to place advertisements through Gmail, Finance, Blogger, or Maps would be subject to AdWords policies and thus could not place advertisements for prohibited sexual services on these platforms.

The Google Display Network extends beyond just Google-owned platforms. First, the Google Display Network includes over one million third party websites on which AdWords advertisements appear. This includes websites owned by major newspapers, magazines, television networks, and professional sports leagues. Advertisements placed on these third party websites through the Google Display Network would be subject

to AdWords policies and thus would be prohibited from displaying advertisements for prohibited sexual services. Second, Google's AdWords policies concerning prohibited sexual services also apply on our Search Engine Network, which includes search engines - such as AOL and Ask.com - that are powered by Google. Although we do not power all searches for search engines in the Search Engine Network, we do power many advertisements that are generated by search engines in the Search Engine Network, and AdWords policies concerning prohibited sexual services would fully apply in this context.

III. Google AdSense

AdSense is a service that allows website publishers to enroll in Google's network for the purpose of enabling advertisements on their websites. AdSense primarily consists of two unique features that website publishers can utilize: AdSense for Search and AdSense for Content.

AdSense for Search enables website publishers to monetize their content by placing a Google search box on their websites. When a user clicks on an advertisement generated by a search query, Google shares the corresponding revenue with the website publisher. With AdSense for Search, the AdWords policies concerning prohibited sexual services apply in the same manner as they do when a user clicks on an advertisement generated by a search on Google.com.

AdSense for Content serves text, image, and video advertisements to websites based on a variety of factors, which may include the content of the website, the location of the website, and the location of a user. As is the case with AdSense for Search, the AdWords policies concerning prohibited sexual services fully apply to AdSense for Content.

IV. Conclusion

Sexual exploitation is a serious problem both in the online and offline worlds. Many Internet companies, including Google, have expended considerable resources to ensure that bad actors are not able to exploit our platforms for prostitution or related services that seek to masquerade under a cloak of legitimacy. Google will continue to be vigilant in enforcing our policies concerning prohibited sexual services and making adjustments in such policies where necessary.

Thank you for your time and consideration of our views.