



May 6, 2019

The Honorable Richard Blumenthal
United States Senate
706 Hart Senate Office Building
Washington, DC 20510

The Honorable Edward J. Markey
United States Senate
255 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Chris Van Hollen
United States Senate
110 Hart Senate Office Building
Washington, DC 20510

Dear Senators Blumenthal, Markey, and Van Hollen,

Thank you for your letter dated April 15 regarding tobacco depictions in media. We appreciate your leadership on this important issue and appreciate the opportunity to respond.

YouTube is an open platform that empowers people to create, broadcast, and share content like never before — giving them more choice, opportunity, and exposure to a diversity of opinions. This openness has democratized how stories, and whose stories, get told. It has created a space for communities to tell their own stories. And it has created a platform where anyone can be a creator and can succeed.

While we believe in access to information, YouTube is also committed to helping keep people safe, which is why we have Community Guidelines that govern the type of content allowed on the platform. These guidelines prohibit certain categories of

material, including sexually explicit content, spam, content that is harmful or dangerous, and content that endangers the emotional and physical well-being of minors.

YouTube Community Guidelines and Ads Policies on Tobacco:

In our Community Guidelines, YouTube expressly prohibits videos that feature minors smoking or vaping. YouTube also does not allow content intended to sell certain regulated goods and services, including nicotine products. This policy prohibits attempts to directly sell these products, as well as links to sites that sell nicotine products. When content violates these policies, we will remove it and issue a “strike” to the channel that uploaded the content.

Additionally, YouTube age-restricts videos that depict adults taking part in dangerous challenges involving nicotine or e-cigarettes, which means that these videos are not visible to users who have not created an account or are logged out, who have created an account but are under 18, or who have [Restricted Mode](#) enabled.

Over the past two years, we have invested heavily in machines and people to quickly identify and remove content that violates our policies. YouTube’s enforcement system starts from the point at which a user uploads a video. If it is somewhat similar to videos that already violate our policies, it is sent for humans to review. If they determine that it violates our policies, they remove it and the system makes a “digital fingerprint” or hash of the video so it can’t be uploaded again. In the fourth quarter of 2018, over 70% of the more than 8 million videos reviewed and removed were first flagged by a machine, the majority of which were removed before a single view was received.

Our staff also carefully reviews community flagged content 24 hours a day, 7 days a week to determine whether there’s a violation of our Community Guidelines. In enforcing all of its policies, YouTube makes exceptions for content that is educational or for documentary, scientific, or artistic purposes.

We have similar policies for advertising. YouTube creators who are in the [YouTube Partner Program](#) can monetize their content through ads. To be eligible for [ads](#), videos must comply with the YouTube Partner Program policies, AdSense Program Policies, and YouTube’s advertiser-friendly content guidelines. Under YouTube’s ad friendly guidelines, video content that promotes or features the sale, use, or abuse of regulated drugs or substances, like tobacco, is deemed not suitable for advertising.

YouTube's advertising policies also prohibit ads that promote tobacco or tobacco-related products, like e-cigarettes or rolling papers, as well as content that provides links to pages that do not follow our tobacco-related content policies. YouTube's advertising policies do, however, allow informational advertisements about quitting smoking.

YouTube Kids

In addition to the main platform, we have created YouTube Kids, a standalone YouTube app built from the ground up with kids and families in mind. This app grew out of our commitment to child safety, which includes empowering parents with tools to help them choose what content their children can access online, educating families about how to stay safe online, and partnering with civil society organizations and industry to help protect children online. This free app contains kid-friendly videos, channels, and playlists. It provides an intuitive and simplified experience, including a variety of parental controls.

Content containing tobacco is not permitted on YouTube Kids. Additionally, YouTube Kids only shows ads that have gone through a rigorous review process for compliance with our [policies](#) and that are approved as family-friendly. These policies prohibit the promotion of tobacco products as part of our policies against products or services that cause damage, harm, or injury.

YouTube Originals

Given the scale at which YouTube operates and the fact that videos on the main platform are user-generated, we have limited our answers below regarding specific titles to YouTube's original series and movies ("YouTube Originals"). Beyond YouTube's Community Guidelines, YouTube Originals have content policies regarding language, dialogue, sex, nudity, violence and other potentially inappropriate content. Programs are given a content rating of G (General Audience), PG (Guidance Suggested), TV-14 (Teen), and TV-MA (Adult). A pre-roll is displayed before all TV-MA content, indicating that the program may not be suitable for all audiences, and that viewer discretion is advised.

YouTube launched its first YouTube Original titles in 2016. Since then, it has produced 132 features or series programs. Of these 132 productions, 26 of them contain tobacco imagery or dialogue. Of those 26 programs, 2 have the content rating R, 13 are rated TV-MA, 10 are rated TV-14, and 1 is rated TV-14 / TV-PG. To be responsive to

the Committee's questions, we are attaching a chart including information detailing these programs.

Conclusion

Thank you again for your letter on this important topic. We believe our policies across the main platform, YT Kids, and YouTube Originals strike an important balance in ensuring users have ample information and control over their viewing experience. That stated, we are always looking for ways to improve and welcome your thoughts in this area. We will consider your suggestions carefully as we work to improve user experience across our products.

We respect and support your efforts to reduce youth smoking and look forward to working with you to achieve that goal.

Sincerely,

A handwritten signature in black ink that reads "Karan Bhatia". The signature is fluid and cursive, with the first name "Karan" being more prominent than the last name "Bhatia".

Karan Bhatia
Vice President, Global Public Policy & Government Affairs
Google