

United States Senate

WASHINGTON, DC 20510

VIA ELECTRONIC TRANSMISSION

September 30, 2021

Sundar Pichai
Chief Executive Officer
Alphabet, Inc.
1600 Amphitheater Parkway
Mountain View, CA 94043

Dear Mr. Pichai,

We write you today regarding the pervasive, ongoing theft of American creativity and innovation financed by complex online advertising networks. Recently, Google was identified as one of the most recognizable brands spending digital advertising dollars to purchase ads on piracy apps and websites.¹ Google's advertising technologies, which include its content delivery network and advertising delivering systems (Google CDN and Google Ad Tech) appear to have provided a majority—51 percent—of ads to piracy apps. This is particularly alarming given Google's resources and technical sophistication—other digital advertisers “almost never appear on piracy apps, suggesting that their processes for protecting their brands are comprehensive and effective.”²

Google plays a major role in the advertising ecosystem, as a buyer, seller, and operator of an exchange. Google's website states that it fights piracy by cutting off advertising revenue, and that it has removed over 91,000 domains from our advertising network for abusing copyrighted material. Google is a member of the Trustworthy Accountability Group (“TAG”) and holds a “Certification Against Piracy.” While we applaud the efforts taken thus far to stop financing of pirate websites, we believe more can be done.

Cutting off ad dollars to pirate websites and apps deprives thieves of an important revenue stream and ensures respected brands are associated with legitimate content. This is a serious issue: over *a billion dollars a year* in advertising goes to supporting online pirated content. Criminals profit by giving users free access to stolen movies, music, books, software, and other materials—stealing money from hardworking creators, including many small businesses and individual artists. These pirate websites also have been linked to malware, fraud, and other harmful activities. Advertising from major brands like Google lends credibility to these websites and apps, potentially tricking users into thinking they are accessing legitimate content.

¹ Digital Citizens Alliance and White Bullet, *Breaking (B)ads: How Advertiser-Supported Piracy Helps Fuel A Booming Multi-Billion Dollar Illegal Market* (July 2021), <https://www.digitalcitizensalliance.org/clientuploads/directory/Reports/Breaking-Bads-Report.pdf>

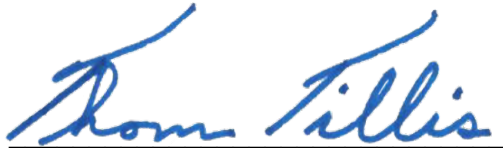
² *Id.*, pg. 17.

It is imperative that American companies stop purchasing advertising on websites and apps that promote criminal behavior and intellectual property theft. Accordingly, we ask that you answer the following questions by October 30, 2021, and outline what steps you are taking to stop supporting these pirate websites illegal activity.

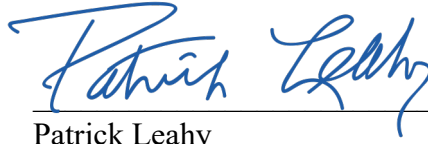
1. What steps does Google take, both in the United States and worldwide, to prohibit advertising on piracy websites and applications?
2. Why was Google identified as one of the top major brands involved in placing advertising on applications? What measures are you taking to change this?
3. Do you agree that supporting commercial-scale pirate websites and apps through advertising dollars is wrong? Does Google profit from advertising on websites that contain pirated content?
4. Does Google, or its agents or subsidiaries, identify websites or apps that pose a risk of distributing or displaying copyright protected content without authorization?
5. Does Google, or its agents or subsidiaries, restrict the display of its advertisements on websites that infringe copyright, or pose a high risk of engaging in copyright infringement?
6. Does Google, or its agents or subsidiaries, block payment for ad impressions on pirated content?
7. Does Google, or its agents or subsidiaries, conduct independent audits to ensure that any advertising policies are being implemented effectively? How frequently are these policies reviewed?
8. Does Google collect data over its own ad placements that would allow it to prevent placement on websites or apps that pose a high risk for distributing illegal content, including pirated content?
9. Google Ads is a tool offered to businesses and brands to place their ads in front of consumers. A brand chooses the type of audience it wants to reach and Google places the ad on the websites most likely to reach the target demographic. What steps are taken to ensure that ads are not placed on pirate websites?
10. Google's advertising subsidiaries - including AdSense and AdMob – also help websites and apps sell their ad space. AdSense is an advertising network that provides fast and easy access to brands that are looking to advertise. AdMob provides a similar service for apps. What steps are taken to ensure that pirate publishers are prohibited from selling ad space through Google's advertising subsidiaries?
11. What steps is Google taking to enhance transparency of its activities on its advertising networks?

Thank you for your prompt attention to this matter. We look forward to your reply and to seeing what steps you will take to end financial support for online piracy websites.

Sincerely,



Thom Tillis
United States Senator



Patrick Leahy
United States Senator