PART A: USER COUNT QUESTIONS

Q1: How do you measure the number of users on your service?

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Question 2: If your service comprises a part on which user-generated content is present and a part on which such content is not present, are you able to distinguish between users of these different parts of the service? If so, how do you make that distinction (including over a given period of time)?

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Question 3: Do you measure different segments of users on your service?

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Question 4: Do you publish any information about the number of users on your service?

Depending on the product, Google has historically published some high level worldwide user count information. Currently, Google publishes active recipient counts for the EU for certain services, as required by the EU Digital Services Act. The February 2023 and August 2023 Reports are available here.
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Question 5: Do you contribute any user number data to external sources/databases, or help industry measurements systems by tagging or sharing user measurement data? If not, what prevents you from doing so?

N/A

PART B: RESEARCH ON U2U SERVICES

Question 6: Do you have evidence of functionalities that may affect how easily, quickly and widely content is disseminated on U2U services?

YouTube

YouTube is an online video sharing platform that allows users to create, view and interact with user-generated content. Users can search for and watch videos, create a personal YouTube channel, like/comment/share others' videos, subscribe to follow other YouTube channels, and create playlists to organise videos.

In terms of functionalities that are relevant to the dissemination of content:

- Video content can be created by a user and published to their channel. The creator can designate it as (i) 'private' - not visible to other users; (ii) 'unlisted' - available to users who have been given the direct link, but not available on Search & Discovery; or (iii) 'public' - available to anyone using the YouTube platform. The creator can also control interactions with the content, including by turning off comments, reviewing all comments before publication, or holding potentially inappropriate comments for their review. These features therefore allow users some control over how widely and easily their content is disseminated on the service.
- Users encounter content by searching for it themselves (whether within the platform directly or via a web search), through subscribing to certain channels, or by videos being recommended for them within the platform. Recommendations can be based on currently trending content, or tailored to the user based on user behaviour. Recommender systems can theoretically increase the virality of content; however, properly functioning recommender systems play an important role in how platforms, like YouTube, maintain a responsible platform for their users and creators. They connect users to relevant, timely and high-quality information and at the same time complement the work done by our Community Guidelines, which specify what content is not permitted on YouTube. Our recommender system also takes the additional step of prioritizing and surfacing authoritative content to viewers on topics such as news, politics and medical and scientific information (see also Q9, in relation to Violative View Rates).
- Users can share video content that they encounter on YouTube using the "Share" function. This function creates a link to the content, which can be shared on other third party applications (such as email or social media). It cannot be shared directly through YouTube, such as via an instant message to another user (since YouTube doesn't offer direct messaging between users).
- Users can save, 'like', 'dislike' or comment on video content that they encounter. There is no function to "share" a comment (so the potential for virality is limited for this content). As mentioned above, YouTube also doesn't offer a direct messaging functionality between users.
- Content creators can also join the YouTube Partner Program ("**YPP**") and monetise content, if they meet certain criteria (see here). One of the eligibility thresholds requires the creator to either (i) have 1000 subscribers with 4000 valid public watch hours within the last 12 months; or (ii) have 1000 subscribers with 10 million valid public Shorts views in the last 90 days. For this reason, YPP participants have financial incentives to ensure their content meets YouTube's Monetization Policies and Community Guidelines as failure to do so can result in being removed from YPP and significant hurdles need to be met before they can rejoin.

On YouTube, we measure "virality" using our key Trust & Safety metric - Violative View Rate - see response to Q.9 below.

Other Google services

Many other Google services are designed for a specific purpose (such as navigation on Maps), but may include some ancillary user-to-user functionalities (such as reviews of locations on Maps). In this context, the functionalities relating to dissemination of content are more limited. For example:

- For many of these products, content has to be sought out specifically by searching for it with a query; user-generated content is not shown to other users by way of a recommender algorithm.
- Some products (like Google Photos) are 'closed' platforms, where a user's content can only be shared deliberately and individually with other users (rather than being readily visible to anyone on a public platform). For those products, users cannot search for other users' content, unless it has already been shared individually by that user and saved into the recipient user's library.
- Where the ability to share content is limited to direct sharing to individual users (eg. Via a link or sharing within an application like Docs or Photos), this evidently limits the likely user reach and speed of dissemination. In other words, an easily discoverable video on a public platform that is accessible to many millions of users is more likely to actually be viewed by a high number of users; whereas content that is just shared manually and deliberately with specific users in Photos will necessarily mean that the number of users likely to view the content is significantly lower.
- Most other Google products do not have financial incentives for users associated with the dissemination of content (like the YouTube Partner Program).

Question 7: Do you have evidence relating to the relationship between user numbers, functionalities and how easily, quickly and widely content is disseminated on U2U services?

See response toQ6.

Question 8: Do you have evidence of other objective and measurable factors or characteristics that may be relevant to category 1 threshold conditions?

The prevalence of the most egregious content (eg. CSAM and terrorist content) could be a relevant factor (for example, based on a high number of views of that content, relative to the size of the platform).

Google offers many products with a high user reach (eg. Maps) but which have extremely low inherent risks associated with encountering harmful content, either due to the nature of the primary use of the product (eg. Navigation) and/or due to the limited user-to-user functionalities (as outlined in response to Q6 above). Examples of other factors relevant to Category 1 thresholds could therefore include:

- The functionalities of the service (see Q6 above).
- Conclusions from risk assessment reports about the residual risk of encountering particular content (such as CSAM and terrorist content). The nature of the potential violations are likely to be important - for example video content containing CSAM or graphic violence may be far more harmful to other users than text-based content.
- The primary use of the product (e.g. whether it is a social media platform, where user-to-user interaction is a primary function, or whether it is just an ancillary feature);
- Metrics like Violative View Rates - i.e. the estimate of the proportion of video views that violate our community guidelines (see below).

Question 9: Do you have evidence of factors that may affect how content that is illegal or harmful to children is disseminated on U2U services?

We believe it is important that any assessments of potential or actual harm to users focus on appropriate metrics, and not just user counts (since high user numbers doesn't necessarily translate into a high risk of encountering harmful content).

For **YouTube**, we note that combating the virality of violative content is inherently built into our approach to Trust & Safety. To measure our progress on removing violative videos before they are widely viewed, we developed a metric called Violative View Rate (VVR), which has been publicly available since 2021. This metric, updated and made publicly available quarterly, estimates the percentage of total views on YouTube that are of violative videos (i.e. videos that are inconsistent with our Community Guidelines). In our view, the VVR has the strongest correlation to end user harm, rather than other metrics such as:

i) User count;

ii) Number of pieces of violative content;

iii) Turnaround times.

In other words, even where a service potentially has a high user count, and/or high numbers of pieces of violative content, this is still not necessarily a strong indication of risk to end-users, as there may be minimal numbers of users viewing such content.

VVR data gives critical insight into how well we are protecting our community. Although metrics like the turnaround time to remove a violative video or the number of takedowns are important, those statistics do not fully capture the actual impact of violative content on viewers. The VVR is a better measure because it tells us how widely violative videos have been disseminated before they are taken down. Two videos could be removed from YouTube within 24 hours, but one may have 1 view while the other has 1 million views. This is a 100% takedown rate within 24 hours, but that metric obscures the most important information. Because we care most about the potential for harm to users, and potential harm can arise by actual exposure to violative content, we have chosen to focus attention on a metric that specifically measures user exposure. We believe the VVR is the best way for us to understand the extent to which harmful content may reach viewers, and to identify where we need to make improvements. We are committed to being transparent about this metric and working to continue to reduce it over time.

Question 10: Do you have evidence of other objective and measurable characteristics that may be relevant to category 2B threshold conditions?

N/A

PART C: RESEARCH ON SEARCH SERVICES

Question 11: Do you have evidence of matters that affect the prevalence of content that (once the Bill takes effect) will count as search content that is illegal or harmful to children on particular search services or types of search service?

We do not consider that prevalence is a suitable metric to measure the risk of illegal or harmful content on search engines. Prevalence is a metric that may be better suited for hosting services. For example, it is possible to measure that 1 out of 100,000 pieces of content are violative for hate speech on a hosting service, or for video-sharing services to have a "violative view rate." However, since search engines do not host content, they would need to measure this metric for the entire web, which is not possible.

It is important to note that many of the ways in which Google Search protects users do not depend on Search's ability to preemptively analyze content in results and make determinations about whether or in what circumstances it may cause harm. Rather, we design our ranking algorithms so that search results do not show users (lawful) explicit or graphic content unless specifically searching for it. In addition to these built-in protections, users can control what content shows up in results through the SafeSearch setting. This setting is optional, unless a user's account is supervised, or a user is accessing the web from a network or device managed by someone else, for example, if a user is using public wifi. To provide additional layers of protection, SafeSearch settings offer options to filter or blur explicit content. This type of approach reflects the fact that search engines are different from other types of online service, especially user-to-user services such as social media platforms, which provide an environment for user interaction that give them a higher level of control over the content, and an opportunity to set and enforce the rules for that interaction. Search engines are by their nature a reflection of the information that is available elsewhere.

Question 12: Do you have evidence relating to the number of users on search services and the level of risk of harm to individuals from search content that is illegal or harmful to children?

Across our products, Google seeks to provide the most relevant and authoritative results possible. We use ranking algorithms to ensure we are meeting users' expectations of surfacing relevant and high quality sources as well as preventing poor quality or harmful content from rising in search results.

Based on third party research, Google Search has the highest information quality in comparison to various other search engines. Hence, size does not equal higher risk. The following third party studies highlight how Google delivers high quality, authoritative information, more so than other search engines, which prioritize alternative media and social media content.

- A study about the availability of pages promoting conspiracy theories in the top results of various search engines found that "all search engines except Google consistently displayed conspiracy-promoting results and returned links to conspiracy-dedicated websites in their top results."

- A study around COVID results, highlights how Google delivers high quality, authoritative information, more so than other search engines, which prioritize alternative media and social media content.
- A study published in Frontiers in Medicine highlights the quality of vaccine information on Google compared to Bing and other search engines. “The results show that not only “alternative” search engines (Duckduckgo, Ecosia, Qwant, Swisscows, and Mojeek) but also other commercial engines (Bing, Yahoo) often return more anti-vaccine pages (10–53%) than Google.com (0%).”

Question 13: Do you have evidence of other objective and measurable characteristics that may be relevant to category 2A threshold conditions?

N/A