



VERIZON COMMUNICATIONS

CHILD SEXUAL EXPLOITATION ONLINE

- **CBIS (lead filer)**
- **Proxy Impact**
- **Maryknoll Sisters of St. Dominic, Inc.**
- **Sisters of St. Dominic of Caldwell, NJ**
- **Benedictine Sisters of Virginia**

For more information, contact Tracey Rembert, CBIS, at: 212-503-1927

Several of Verizon's business lines pose potential risk to children from sexual exploitation - defined as:

- Production, solicitation, distribution, receipt, or possession of child sex abuse material (CSAM) (and legally know as child pornography)
- The grooming (cultivation) or online enticement of children for sexual acts
- Sextortion, coercion to self-produce imagery, and “revenge porn”
- Digitally animated creations showing children in sexual acts or poses
- Sexually explicit language involving children and sex acts
- Child sex trafficking and sex tourism



Children face risks from sexual exploitation through the following activities:

- Social media, photo sharing, microblogging, online dating, chatrooms
- Texting, livechat, livestreaming
- Online gaming/use of gaming consoles
- Internet connected toys, security systems, and similar devices (IoT)
- Email and Internet access
- Cloud storage and photo storage
- Digital content providers and online advertisers
- Corporate ISP and public WIFI



Verizon faces child sex exploitation risks from several business lines:

- One of the largest ISPs in the US (Internet Service Provider)
- Provider of corporate, WIFI and institutional Internet access and services
- Major retailer of mobile communications devices (including smartphones and tablets)
- Verizon Media Group (formerly Oath) includes email, photo sharing, social media, and digital content services
- IoT business, expansion to 5G speeds, increased focus on digital advertising all pose increased risks to children



[Drop in Phone Prices Leads to Increased Child Sex Exploitation study: https://www.mcall.com/business/mc-biz-sex-abuse-smartphone-prices-20180214-story.html](https://www.mcall.com/business/mc-biz-sex-abuse-smartphone-prices-20180214-story.html)



TUMBLR CAUGHT FACILITATING CHILD SEX IMAGERY

In Nov. 2018, Tumblr (owned by Yahoo under the Verizon Media Group division) was removed from the Apple App Store due to violations of child pornography. Verizon banned all pornographic content on the social media platform to come into compliance with App Store policies in Dec. Tumblr lost significant subscribers that month from the action.

It continues to face risks from child sex imagery connected to the app.

VZ Media Group had \$4.6 B write-down in 4Q.

Elkhart man accused of uploading child porn to Tumblr

— Jan. 3, 2019

Rock Hill man uploaded child porn images to Tumblr social media, police say

— Jan. 14, 2019

Sarasota woman accused of uploading child pornography to Tumblr

— Jan. 17, 2019

Abilene police track child porn uploaded to Tumblr to computer used by former ACU student

— Jan. 23, 2019

Florida man arrested for possessing child porn downloaded from Tumblr

— Jan. 29, 2019

Local man sentenced to prison after posting child pornography on Tumblr

— Jan. 29, 2019

Tallahassee man accused of sharing child pornography on Tumblr

— Feb. 8, 2019



LARGEST US FINE FOR CHILD DATA VIOLATIONS

Verizon's AOL unit (under Verizon Media Group) received the largest fine in US history as of Nov. 2018 for violations of the Children's Online Privacy Protection Act.

- AOL had policies in place to protect child data, but ignored them to sell data to online advertisers.
- A single advertiser placed over 1 billion ads online using AOL child user data.
- Data collected included geolocation info.

What Are Peers Doing?

MILLICOM:

[HTTPS://WWW.MILLICOM.COM/OUR-RESPONSIBILITY/RESPONSIBLE-LEADERSHIP/](https://www.millicom.com/our-responsibility/responsible-leadership/)



In December 2014, Millicom signed a [three year agreement](#) with [UNICEF](#) to work jointly on implementing UNICEF and [ITU guidelines](#) on Child Online Protection (COP) as well as to create tools for telecom operators to use in conducting child rights impact assessments. UNICEF and Millicom have since held multistakeholder workshops in Paraguay, Bolivia, Rwanda, El Salvador and Costa Rica.

Tele 2 discloses on its website the number of child sex images identified and blocked. It reports that it uses technology on its own systems/servers to identify and monitor child sex abuse material, which when triggered alerts the company's IT Dept. for immediate action and investigation. It further notes its involvement in the creation of a national hotline for the reporting of CSAM, in partnership with regional ECPAT affiliate, and it conducts an annual survey of children on their Internet use to better understand trends and risks.



TELE2, SWEDEN:

[HTTPS://WWW.TELE2.COM/SUSTAINABILITY/OUR-FOCUS-AREAS/CHILD-PROTECTION](https://www.tele2.com/sustainability/our-focus-areas/child-protection)

What Are Peers Doing?

VODAFONE



- How-to guides for users on reporting abuses and safer usage of popular online platforms.
- Works with industry and hotlines to improve reporting process of CSAM incidents.
 - Has robust reporting tools.
 - Endorsed ICT Principles on “safer use of connected devices and online services by children” and action plan.
- Offers Digital Parenting magazine free of charge to users to stay on top of risks and trends affecting children.

- Robust reporting tools by users and stakeholder assessment of effectiveness.
- Endorsed GSMA (industry group) privacy principles for app developers.
- Mandatory age classification for all apps provided through their platform.
- It assesses takedown times and hurdles for removing CSAM.
- Sponsored psychological risk studies and sent psychologists to schools to educate children about online risks and safety.
- Workshops for parents in its retail stores.



ORANGE

Vodafone: https://www.vodafone.com/content/parents/expert-views/online_sexual_grooming.html; <https://www.vodafone.com/content/digital-parenting.html#>; https://www.vodafone.com/content/parents/howto-guides/report_online_concerns.html

Orange: https://www.orange.com/en/content/download/10344/233098/version/11/file/Company+statement+template_France+Telecom+-+Orange_FINAL_05+02+2013_uk_ok.pdf

What Are Digital Content Peers Doing?

ALPHABET/GOOGLE/YOUTUBE



- Reports metrics on its identification and take down of CSAM.
 - Discloses resources for moderation of content on key platforms.
 - Invested in new technological/AI tools to identify videos previously not registered in main CSAM databases.
- When using search engine to find CSAM, alert will pop up for user, notifying them of illegal activity and advising the user to seek help.
- Supports hackathons to bring diverse IT talent together to target CSAM-disrupting tools.

- Twitter has a clearly defined policy prohibiting multiple forms of child sexual exploitation, and it describes what those forms look like in practice.
- Its policy notes enforcement mechanisms and consequences for non-compliance.
- It publishes an index, by country, of local/regional partnerships it has with child protection/child sex abuse prevention groups.



TWITTER

Alphabet (Google and YouTube): <https://www.cnet.com/news/fight-against-child-sexual-abuse-images-requires-smarter-tech-google-expert-says/>;

Twitter: <https://help.twitter.com/en/rules-and-policies/sexual-exploitation-policy>

US Telecoms

Performance	AT&T	Sprint	T-Mobile USA	Verizon
Basic User Terms Prohibiting CSAM and how to report	✓	✓	✓	✓
Basic User Education on Online Safety (not CSAM specific)	✓	✓		✓
WePROTECT Global Alliance				
Internal Monitoring for CSAM against key dbase	✓	✓	unknown	✓
Major CSAM controversy in past year				✓
Online Safety Team	unknown	unknown	unknown	Unclear from statements
Major child data controversy in past year				✓
TOTAL POSITIVE ACTIONS	3	3	1	3

Peer Digital Content providers, Social Media

Performance	Twitter	facebook	Google/YouTube	Verizon
User Terms Prohibiting CSAM & How to Report	✓	✓	✓	✓
Development of AI Tools or Hackathons	✓	✓	✓	
Moderation Team	✓	✓	✓	
Significant CSAM Controversy Past Yr		✓	✓	✓
Involvement on Child Protection Boards	✓	✓	✓	
Reporting Metrics on CSAM		✓	✓	
Child Data Controversy		✓		✓
Reporting on Blocked Users/Accounts		✓	✓	
TOTAL POSITIVE ACTION	4	6	6	1