

United States Senate

WASHINGTON, DC 20510

February 7, 2025

VIA ELECTRONIC TRANSMISSION

Ms. Lisa Utzschneider
Integral Ad Science
Chief Executive Officer
12 East 49th Street, Fl. 20
New York, New York, 100017

Dear Ms. Utzschneider,

We write to express serious concerns that Integral Ad Science’s advertising verification and brand safety products have led to advertisers inadvertently funding websites known to host child sexual abuse material (CSAM). Recent reports indicate that Integral Ad Science is aware that advertising has appeared on imgbb.com, a website that has been known to host CSAM since at least 2021.¹

Reports indicating that digital advertising technology companies are placing advertisements on websites known to host CSAM are deeply concerning. The dissemination of CSAM is a heinous crime that inflicts irreparable harm on children, and creating a funding stream that perpetuates criminal activity only worsens such harm.²

We are concerned that many advertising companies rely on your services to place their ads without knowing exactly where those ads are shown. It is important that you provide advertisers with transparency. You have previously told your investors that “marketers trust [Integral Ad Science] to protect, measure, inform, and optimize their brand campaigns” and that “Data science is at the heart of our business strategy. Our AI systems enable models that deliver classifications and analytics at greater speed that are scalable with extremely high precision.”³ Yet, these reports show that Integral Ad Science advertiser customers paying for this “precise” technology have had ads served on a website that was identified by the National Center for Missing & Exploited Children (NCMEC) on a publicly available list of websites known to host CSAM.⁴

Advertisers who use Integral Ad Science’s brand safety and verification technologies are unable to verify exactly where their advertising appears and what their dollars fund. This is information you have but do not share with your advertiser customers.⁵

¹ National Center for Missing & Exploited Children, *2021 Notifications Sent by NCMEC Per Electronic Service Providers (ESP)*, MissingKids.org, <https://www.missingkids.org/cybertiplinedata> (last visited Jan. 16, 2025).

² U.S. Dep’t of Justice, *Child Sexual Abuse Material: 2023 Report*, <https://www.justice.gov/d9/2023-06/child-sexual-abuse-material-2.pdf> (last visited Jan. 16, 2025).

³ IAS Q1 2024 Prepared Remarks, <http://web.archive.org/web/20240720183841/https://investors.integralads.com/static-files/c5a07db5-8ea7-4586-806f-4a2935029177> (last visited Jan. 20, 2025).

⁴ *Are Ad Tech Vendors Facilitating or Monitoring Ads on a Website That Hosts Child Sexual Abuse Material?*, ADALYTICS (Jan. 2025).

⁵ Reem Makari, *DoubleVerify and IAS Accused of Running Fortune 500 Ads on Websites with Offensive Content*, CAMPAIGN US (Aug. 12, 2024), <https://www.campaignlive.com/article/doubleverify-ias-accused-running-fortune->

While Integral Ad Science’s failure to prevent advertisers from inadvertently subsidizing a website known to engage in illegal activity is unacceptable, to withhold this data from advertiser customers that would give them more autonomy to prevent their ads from funding illicit activity is inexcusable.

It is imperative that your company take immediate and comprehensive action to address this issue and ensure that you are not funding these heinous crimes against children. To better understand how this occurred and to determine appropriate corrective actions, please answer the following questions **by February 14, 2025**:


1. How did advertisements monitored and “verified” by your platform appear on websites hosting CSAM?
 - a. What mechanisms are in place for identifying and blocking unlawful content and why they did not work in this instance?
2. Since becoming aware that advertising measured by your company appeared on a website known to host CSAM, what specific actions has your company taken to remedy this issue? Include details on updates to your verification processes, blocking of offending sites, and outreach to impacted advertisers.
3. Do you annually review NCMEC’s transparency reports to ensure that you are appropriately classifying or blocking websites that host CSAM?
 - a. If so, why did you continue to allow client ads to serve on imgbb.com?
 - b. If not, why not?
4. How many URLs or pages has Integral Ad Science reported to NCMEC since 2021?
 - a. Did Integral Ad Science report the website in question? If so, to which authorities and on what exact date(s)?
5. How much revenue has Integral Ad Science derived from measuring, monitoring, or otherwise deploying your technologies on advertising served on websites known by NCMEC to host CSAM?
 - a. What is your policy on revenue derived from monitoring advertising on illicit websites?

[500-ads-websites-offensive-content/1884708](https://www.adage.com/article/digital-marketing-ad-tech-news/brand-safety-controls-questioned-adalytics-report-about-fandom/2574066); Jack Neff, *Brand Safety Controls Questioned by Adalytics in Report About Fandom*, AD AGE (Aug. 7, 2024), <https://adage.com/article/digital-marketing-ad-tech-news/brand-safety-controls-questioned-adalytics-report-about-fandom/2574066>.


6. How does your company ensure comprehensive monitoring and vetting of websites in the ad supply chain? Explain the methodologies and tools used to prevent illegal content from being monetized.
7. Why were your systems unable to identify and block overtly unlawful websites hosting CSAM? Identify any systemic gaps and steps you are taking to address these vulnerabilities.
8. What additional transparency can you provide to advertisers regarding the specific URLs where their ads appear? Outline plans, if any, to improve URL-level visibility for your clients to enhance their ability to evaluate brand safety.

Your cooperation and transparency are essential to safeguarding the safety of our children. Thank you for your attention to this urgent matter.

Sincerely,



Marsha Blackburn
United States Senator



Richard Blumenthal
United States Senator