

United States Senate

WASHINGTON, DC 20510

February 7, 2025

VIA ELECTRONIC TRANSMISSION

Mr. George Ivie
Chief Executive Officer, Media Rating Council
420 Lexington Avenue, Room 343
New York, New York, 10170

Dear Mr. Ivie,

We write to express profound concern about Media Rating Council (MRC)-accredited entities that have participated in the delivery of advertising on a website that has been known to host child sexual abuse material (CSAM) since at least 2021,¹ resulting in the inadvertent funding of criminal activity.² The dissemination of CSAM is a heinous crime that inflicts irreparable harm on its victims.³ When digital advertisers place content on websites that are known to host such activity, they have in effect created a funding stream that perpetuates criminal operations and irreparable harm to our children. We urge your organization to strengthen and adequately enforce its standards such that accredited vendors are no longer allowed to support the funding of CSAM and other illegal websites.

The MRC's actions here—or at best, inaction—have raised several concerns. First, advertisers have unwittingly advertised on a website known to host CSAM, despite relying on technology vendors accredited by the MRC. DoubleVerify and Integral Ad Science are MRC-accredited for various metrics, including for “Ad Verification Processes.”⁴ The MRC's “Supplement to IAB Guidelines for the Conduct of Ad Verification” state that “[p]rocedures related to determining the legality of sources and content should include initial qualification using [i]ndustry and local sources of known illegal entities, as well as ongoing evaluation linked with ad verification results and periodic internal auditing of content sources.” The guidelines further state that “[a]d verification organizations seeking accreditation will be required to provide evidence of source vetting processes where applicable during accreditation audit processes.”⁵

The MRC supplement also requires that “to the extent that ad verification organizations have identified illegal or illegitimate sources that are either not included in [i]ndustry or local sources

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 *Are Ad Tech Vendors Facilitating or Monitoring Ads on a Website That Hosts Child Sexual Abuse Material?*, ADALYTICS (Jan. 2025), <https://adalytics.io/blog/adtech-vendors-csam>.

³ 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).

⁴ Media Rating Council, Accredited Services: Digital, MEDIA RATING COUNCIL, <https://mediaratingcouncil.org/accreditation/digital> (last visited Jan. 21, 2025).

⁵ Media Rating Council, MRC Supplement to IAB Guidelines for the Conduct of Ad Verification: Enhanced Content Level Context and Brand Safety (Sept. 2018), <https://www.mediaringcouncil.org/sites/default/files/Standards/MRC%20Ad%20Verification%20Supplement-%20Enhanced%20Content%20Level%20Context%20and%20Brand%20Safety%20%28Final%29.pdf>.

of known illegal entities processes should be put in place to routinely communicate these sources to legal authorities, oversight bodies and the industry at large.”⁶ Despite these guidelines, reports indicate advertising served on imgbb.com—a website known to host CSAM since at least 2021—where MRC-accredited vendors’ DoubleVerify and Integral Ad Science products were used by advertisers.

Additionally, the MRC has failed to adequately enforce its standards and investigate non-compliance, resulting in years of continued funding of CSAM and other criminal activity. This is not the first time that MRC-accredited vendors were found to have been involved in the delivery of advertising on illicit websites.⁷ Nor is this the first instance of MRC-accredited vendors that have violated the MRC’s own standards.⁸ Nevertheless, these companies have maintained their accreditation status and remain in good standing.⁹

MRC-accredited vendors have previously pointed to their accreditation status to evade scrutiny for their failures, including where they have failed to prevent advertising from funding illegal websites.¹⁰ The MRC’s own public statements have spoken to its close ties to the United States government, insinuating a certain level of rigor and esteem associated with accreditation.¹¹ Yet others have raised concern about the MRC’s failure to investigate or remedy non-compliance by accredited vendors, or to make clear the scope of the MRC’s accreditation.¹²

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**:

⁶ *Id.*

⁷ Jack Neff, *Google Served Brand Search Ads Through Porn Sites, Other Problematic Partners: Adalytics Study*, AD AGE (Sept. 20, 2024), <https://adage.com/article/digital-marketing-ad-tech-news/google-served-brand-search-ads-through-porn-sites-other-problematic-partners-adalytics-study/2531426>.

⁸ Anthony Vargas, *Why Does Ad Tech Still Fail To Spot – And Stop – MFA-Fueled Schemes?*, ADEXCHANGER (Apr. 9, 2024), <https://www.adexchanger.com/publishers/why-does-ad-tech-still-fail-to-spot-and-stop-mfa-fueled-schemes/>.

⁹ Media Rating Council, *Accredited Services: Digital*, MEDIA RATING COUNCIL, <https://mediaratingcouncil.org/accreditation/digital> (last visited Jan. 21, 2025).

¹⁰ 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>.

Setting the Record Straight: Addressing Adalytics’ Continued Misleading Claims, DOUBLEVERIFY, <https://doubleverify.com/setting-the-record-straight-addressing-adalytics-continued-misleading-claims/> (last visited Jan. 21, 2025).

¹¹ Media Rating Council, *A Brief History of the Media Rating Council*, LINKEDIN (Apr. 8, 2024), <https://www.linkedin.com/pulse/brief-history-media-rating-council-media-rating-council-tuxre/>.

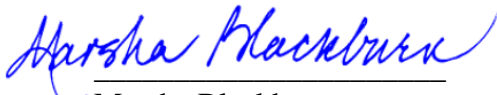
¹² Ronan Shields, *The Media Rating Council Is Angling for Better Clarity in an Era of Compounding Complexity*, DIGIDAY (Aug. 4, 2023), <https://digiday.com/media/the-media-rating-council-is-angling-for-better-clarity-in-an-era-of-compounding-complexity/>; CIMMVideos, *The Big Debate: Governance, Transparency & the Future of Measurement*, YOUTUBE (Nov. 9, 2023), <https://www.youtube.com/watch?v=UvxdytSfa3Y&list=PLw3p3eoa3MbNZ2OMKu5FT2Z-B93iNwNwT&index=12>.

1. What is the MRC’s plan to review the accreditation status of the measurement companies Integral Ad Science and DoubleVerify that have measured and/or verified advertising that has appeared on and funded a website known to host CSAM? What is MRC’s standard for reviewing or revoking an entity’s accreditation(s) where such a company fails to identify or prevent ads from appearing on known CSAM or otherwise unlawful websites? Please detail any immediate corrective actions, including reviews of certified companies and potential revocation of certifications where necessary.
2. Have MRC-accredited vendors Integral Ad Science or DoubleVerify reported URLs containing CSAM to the National Center for Missing & Exploited Children (NCMEC) in accordance with MRC’s requirements?¹³ If so, how many URLs have been reported since 2021? From 2021 to 2025, how many instances did IAS and DoubleVerify specifically report imgbb.com or ibb.co to NCMEC?
3. How has MRC responded to vendors who make false or misleading assertions or mischaracterizations about their accreditation status?
 - a. What specific audits, monitoring, or oversight mechanisms does MRC employ to ensure certified companies comply with these standards? How many vendors’ accreditation status has MRC revoked for non-compliance with standards?
 - b. Has MRC conducted a review of DoubleVerify’s or IAS’ accreditation status with respect to potential non-compliance? Please provide information regarding any such review that has occurred since 2021. Please provide details of the brand safety accreditation process and any audit, investigation, or review of accreditation status conducted of IAS and DoubleVerify since 2021.
4. Why does advertising continue to be served on CSAM-hosting and other illicit websites despite the use of MRC-accredited vendors? Does this represent a shortcoming of the technology vendors or their advertiser customers?
5. Do the MRC’s guidelines speak to whether accredited vendors are permitted to maintain their revenue share or fees when they measure ads served on CSAM or other illegal websites?
9. What additional measures is MRC considering to strengthen its certification and enforcement process and prevent similar failures in the future? Please provide a timeline for implementing these measures.

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

¹³ Media Rating Council, *MRC Supplement to IAB Guidelines for the Conduct of Ad Verification: Enhanced Content Level Context and Brand Safety* (Sept. 2018), <https://www.mediaratingcouncil.org/sites/default/files/Standards/MRC%20Ad%20Verification%20Supplement-%20Enhanced%20Content%20Level%20Context%20and%20Brand%20Safety%20-%28Final%29.pdf>

Sincerely,



Marsha Blackburn
United States Senator



Richard Blumenthal
United States Senator