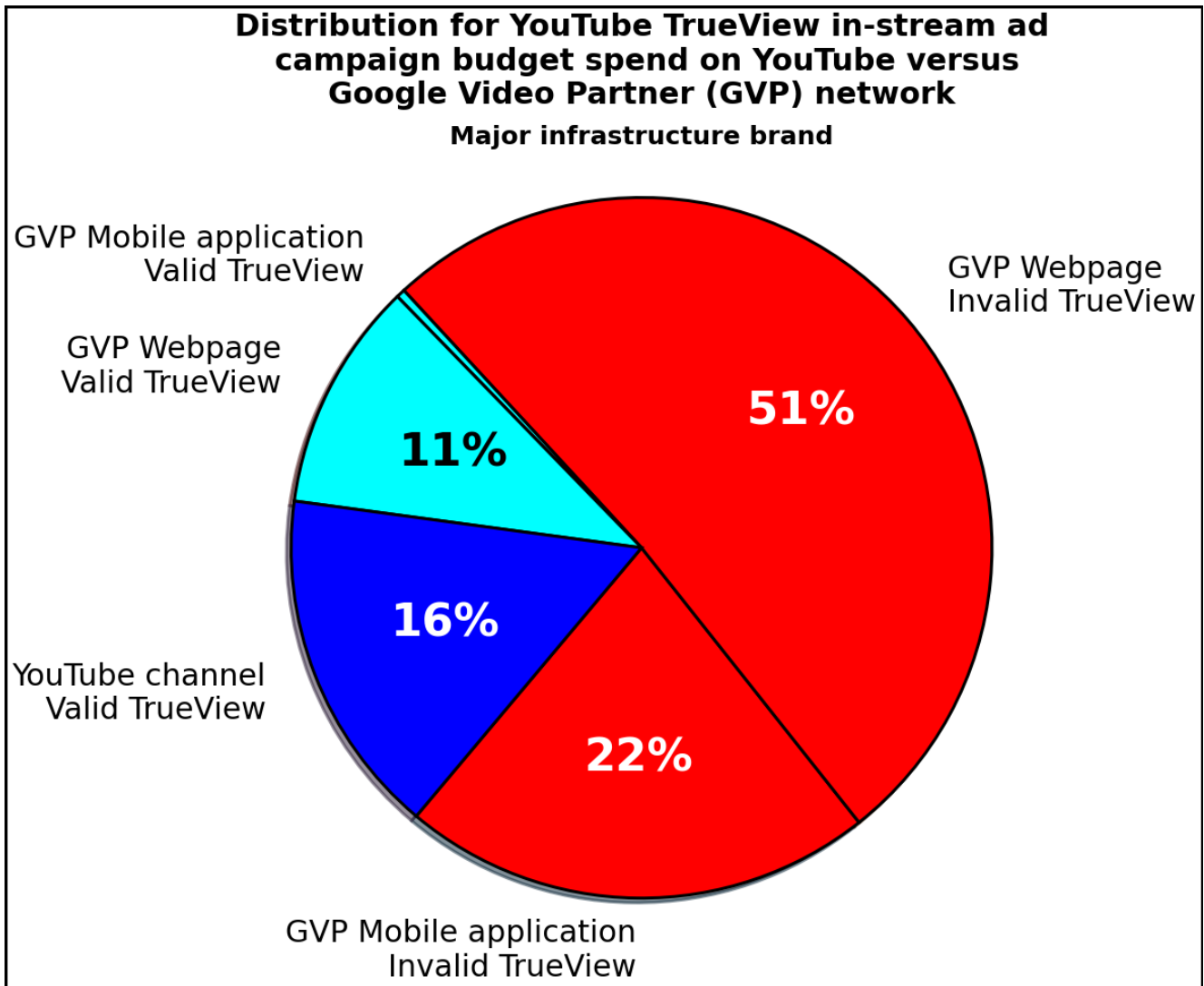


# Did Google mislead advertisers about TrueView skippable in-stream ads for the past three years?

This report finds that advertisers including Fortune 500 brands, the US federal government, and many small businesses may have been misled for years about Google's proprietary **TrueView** skippable in-stream video ads. This misalignment may have cost media buyers up to billions of digital ad dollars, which were ultimately spent on small, muted, out-stream, auto-playing or interstitial video ad units running on independent websites and mobile apps.

TrueView is **Google's** "proprietary cost-per-view, choice-based ad format that serves on YouTube, millions of apps, and across the web." With TrueView, advertisers only pay "for actual views of their ads, rather than impressions." TrueView asks users if they want to skip the video ad after 5 seconds with a visual prompt. Google's policies state that TrueView ads must be skippable, audible, and playing of the video (and ad) cannot be solely initiated by passive user scrolling.

However, this research report finds that for years, significant quantities of TrueView skippable in-stream ads, purchased by many different brands and media agencies, appear to have been served on hundreds of thousands of websites and apps in which the consumer experience did not meet Google's stated quality standards. For example, many TrueView in-stream ads were served muted and auto-playing as out-stream video or as obscured video

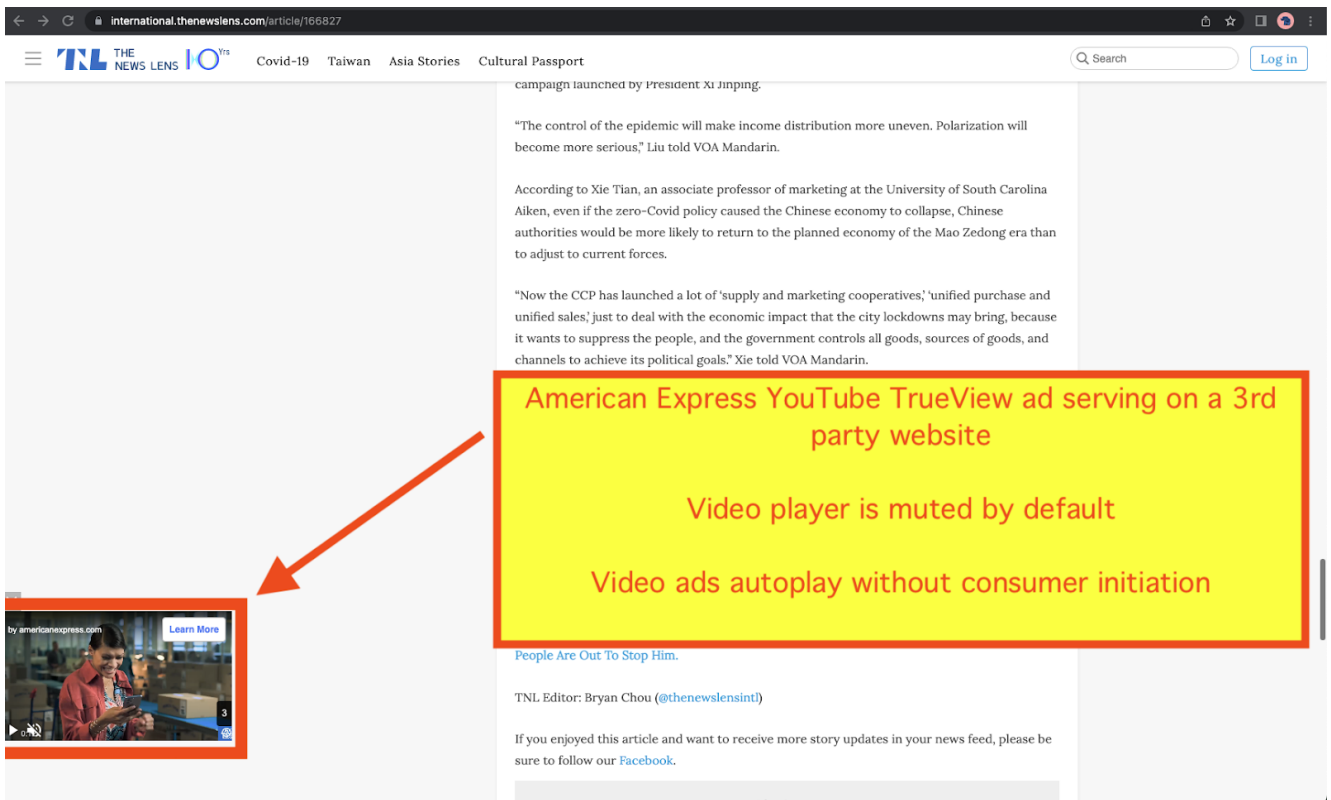


*For a major infrastructure brand, only ~16% of their TrueView skippable in-stream video ad budget was spent on YouTube.com or YouTube’s apps. The majority of their budget was spent on tens of thousands of different websites or mobile apps which make up the Google Video Partner (GVP) network. The majority of those GVP mobile apps and websites served the TrueView skippable in-stream video ads in outstream, muted, auto-playing, interstitial, and/or non-visible ad slots - which are inconsistent with the TrueView or skippable in-stream ad format.*

Adalytics shared examples of these TrueView skippable in-stream placements with advertisers and media buyers. Several dozen marketers stated that they would not have purchased this TrueView skippable in-stream inventory running on 3rd party environments, if this fact was clearly explained to them in advance. Marketers also shared that they did not expect or want video ads to be run muted, and doing so was contrary to their understanding of TrueView.

stream ad placement reports from brands and advertisers - including Fortune 500 brands - showed that in some ad campaigns, between 42 to 75% of TrueView in-stream ad spend was allocated to GVP sites and apps which did not meet Google’s standards.

Many media buyers were surprised to learn that the majority of their ad budgets against a so-called “walled garden” environment was spent on muted, auto-playing video ads on third party websites such as lebanonfiles.com and freewebnovel.com, or on foreign-developed Android mobile gaming apps for toddlers.



**Screenshot of a YouTube TrueView ad for americanexpress.com, served in a muted, out-stream, auto-playing video player on a 3rd party website.**

Many TrueView skippable “in-stream” ads that Adalytics reviewed were delivered on sites and apps in which the ads were rendered in a method that violates Google’s own definitions of in-stream. Specifically, ads were placed on pages with such characteristics as



- in a fully muted video player
- with little to no video content in between consecutive TrueView ads
- where the video ads auto-play without any viewer interaction or initiation
- the ads played continuously, on a loop

One digital advertising professional who was shown an advanced copy of this report said “repackaging shitty, brand-unsafe outstream as instream is a big problem.” The professional further stated “that seems like a fraud”.

In some instances, multiple TrueView skippable in-stream ads were rendered on a consumer’s device at the same time. Other examples include TrueView skippable in-stream ads that were served “stacked” on top of another “in-stream” ad. Furthermore, in some instances, the “Skip” button from the video ad was hidden or obscured outside the user’s viewport, making it impossible for the consumer to “choose to skip” the video ads after 5 seconds, forcing the user to experience the ad – a direct violation of Google’s quality standards for TrueView ads. This may have artificially inflated TrueView skippable in-stream ad video completion rates, possibly resulting in higher costs for Google’s advertisers.



by chase.com

Skip Ad ▶

0:16

\$999.99 \$69.99

Nigeria the most popular Afr...

RENALTE

In April 1994, the Nigerian national football team was ranked 5th in the FIFA rankings.

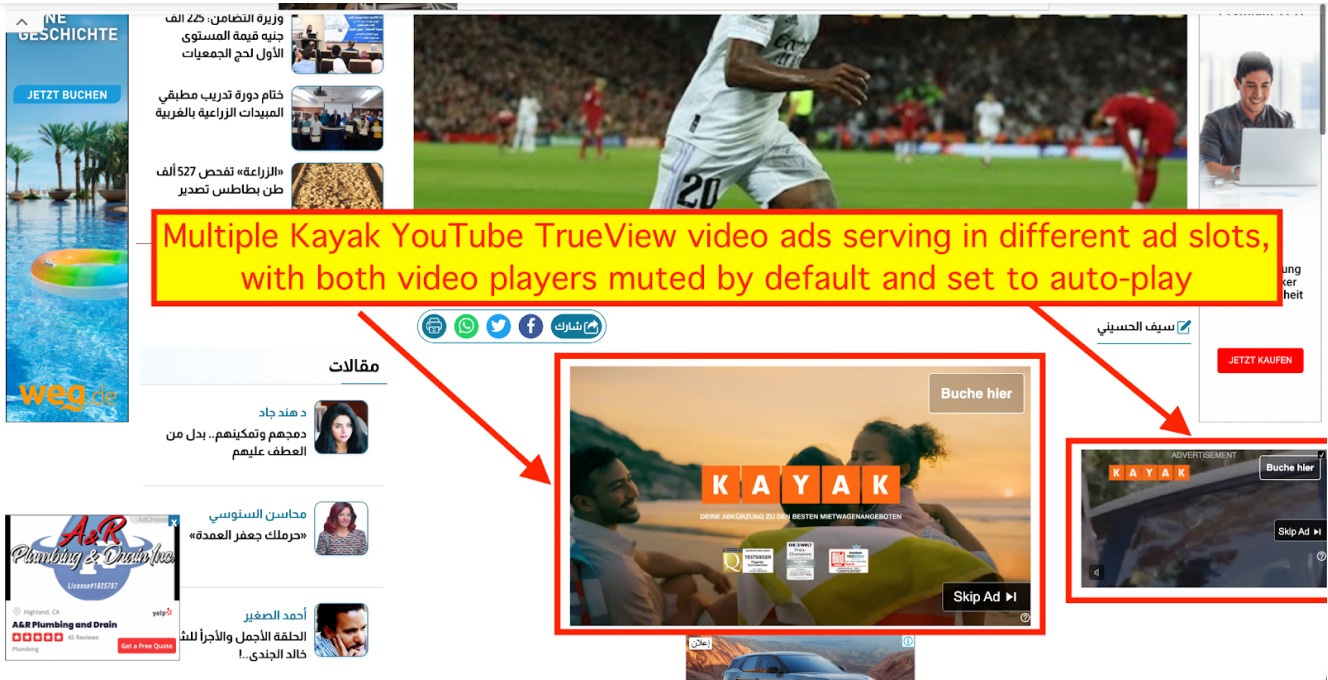
**JPMorgan Chase YouTube TrueView ad**

لمثله، في المباراة التي جمعتهما على ملعب "أليانز ستادיום" في ذهاب نصف نهائي كأس إيطاليا.

الأرجنتيني أنخيل دي ماريا كان قريبًا من افتتاح التسجيل لـ"يوفنتوس" في الدقيقة الرابعة، عندما تلاعب بدفاعات إنتر في هجمة مرتدة، لكن تسديده مرت بجوار القائم الأيسر.

روابط إعلانية بواسطة Project Agora

*Screenshot of a JPMorgan Chase TrueView skippable in-stream video ad serving on a 3rd party website, in a muted, auto-play, partially obscured video player that is covered by another ad.*



The screenshot shows a website layout with several video ad slots. A yellow callout box at the top center contains the text: "Multiple Kayak YouTube TrueView video ads serving in different ad slots, with both video players muted by default and set to auto-play". Red arrows point from this callout to two specific video ad players. The larger player in the center shows a Kayak advertisement with the text "KAYAK" and "BUCHUNG ZU DEN BESTEN MIETWAGENANGEBOTEN". The smaller player on the right shows a similar Kayak advertisement with the text "KAYAK" and "Skip Ad".

*Multiple Kayak.de TrueView skippable in-stream video ads being served on dostor.org, with both video ads playing in a muted, auto-play state.*

Another media buyer who received an advanced copy of this research told Adalytics:

“Nobody goes to walled gardens like YouTube to run on audience networks which all have the same crappy inventory. This is a method for YouTube and Google to extract more budget and manufacture scale in a way that is palatable to the advertiser because they don’t fully understand it.”

Brands that may have purchased muted, auto-playing, mis-declared TrueView skippable in-stream inventory include:

1. The Wall Street Journal (owned by Dow Jones & Company, a division of News Corp)
2. The United States federal government, including the Department of Health & Human Services (Medicare, Army, Social Security Administration)
3. The European Parliament



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5. The New York City municipal government ([nyc.gov/office-of-the-mayor](https://nyc.gov/office-of-the-mayor))
  6. HP
  7. Ernst & Young
  8. Bayer
  9. Newark, Delaware Police Department ([joinnewarkpd.com](https://joinnewarkpd.com))
  10. The Dutch military cyber defense forces  
([werkenbijdefensie.nl/burgermedewerker/ict](https://werkenbijdefensie.nl/burgermedewerker/ict))
  11. JPMorgan Chase Bank
  12. American Express
  13. Public Service Alliance of Canada
  14. Alberta New Democratic Party
  15. National Volunteer Fire Council
  16. Environmental Defense Fund (EDF) ([edf.giftplans.org](https://edf.giftplans.org))
  17. Samsung
  18. Empower Annuity Insurance Company of America
  19. Sephora
  20. Macy's
  21. Disney Plus
  22. Best Buy
  23. Mercedes-Benz
  24. General Motors

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26. Pizza Hut
  27. Microsoft
  28. Instacart
  29. IBM (Redhat)
  30. Ford
  31. Honda
  32. Vimeo
  33. HBO Max (owned by Warner Bros. Discovery)
  34. Novo Nordisk
  35. Intuit (owner of Quickbooks)
  36. The North Face
  37. Columbia (sportswear company)
  38. Volkswagen
  39. Abbott Laboratories (pediasure.ca)
  40. Petco
  41. cerebral.com
  42. servicetitan.com
  43. Google ([Google Career Certificates](#) and [Google Workspace Domains](#))
  44. McDonald's
  45. Hyatt Hotels Corporation
  46. Lavazza





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48. Alberta Blue Cross Plan
  49. California Science and Technology University
  50. Edgewell Personal Care (owner of Schick razors)
  51. Enterprise Rent-A-Car
  52. Rocket Mortgage
  53. Church & Dwight (OxiClean)
  54. National Geographic
  55. American Committee for the Weizmann Institute of Science (weizmann-usa.org)
  56. Aflac Inc. (American Family Life Assurance Company)
  57. XM.com (trading name of Trading Point Holdings Ltd.)
  58. Wolters Kluwer
  59. Virgin Voyages
  60. Aeroméxico (aeromexico.com)
  61. Paramount Plus
  62. Lacoste
  63. James Hardie Industries
  64. Western Union
  65. National Harbor (nationalharbor.com) - from the Maryland Office of Tourism (visitmaryland.org)
  66. Ebay
  67. Klaviyo



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69. Zillow
  70. St. George's University
  71. Cisco
  72. Hyundai
  73. Mazda
  74. Notion (notion.so)
  75. Subaru
  76. Consumer Cellular
  77. Fandango (fandango.com)
  78. Michigan Economic Development Corporation (michigan.org)
  79. Tourism Nova Scotia (planyournovascotia.com)
  80. Kayak.com
  81. etoro.com
  82. Royal Dutch Gazelle bikes
  83. Terminix Pest Control & Termite Treatment
  84. Canadaisthesolution.com (Canadian Energy Centre Ltd)
  85. FreeTaxUsa.com
  86. Squarespace.com
  87. hotjar.com
  88. Carrefour
  89. Olt.com



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91. The Federalist Society
  92. Quirion AG
  93. MyFundedFX
  94. Scholastic Corporation
  95. Adobe
  96. Miele (domestic appliances)
  97. Hertz
  98. Bosch
  99. Vimeo
  100. Plaid
  101. Hollister
  102. TikTok
  103. United Wholesale Mortgage
  104. Indeed.com (jobs website)
  105. Bellroy (Australian accessories brand)
  106. Fiverr
  107. Tommy John
  108. Micro Focus International Plc
  109. NewRelic
  110. sitechange.com
  111. vda-global.lilisi.com

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113. Circa Resort & Casino Las Vegas (circalasvegas.com)
  114. Dyson
  115. Beliani
  116. Semrush
  117. McCain Foods
  118. Expedia, Vrbo, and hotels.com
  119. kodiakcakes.com
  120. tablethotels.com
  121. Pancreatic Cancer Action Network (PAN)
  122. Grammarly
  123. GrubHub
  124. Allbirds
  125. Bristol Myers Squibb
  126. Pfizer
  127. Haleon (formerly GSK Consumer Healthcare)
  128. Athletic Greens
  129. Fever-Tree
  130. KitchenAid (American home appliance brand owned by Whirlpool Corporation)
  131. Doptelet (AkaRx, Inc)

The list of media agencies and media buying companies that appeared to have transacted muted, auto-playing, out-stream TrueView ads include:



- 
2. Dentsu (Amnet)
  3. Publicis (Audience on Demand, Precision)
  4. Omnicom (Accuen)
  5. WPP (Xaxis, Headlight, Essence)
  6. Havas (Affiperf)
  7. Jellyfish
  8. Brain Labs Digital
  9. Horizon Media (Canvas WorldWide)
  10. MiQ

This mis-declared TrueView in-stream inventory has been observed going back as far as 2020.

Google was observed serving brands' TrueView ads on [websites](#) that [have](#) had [tens](#) of thousands of copyright violation takedown requests filed against them (potential "piracy sites"), raising possible brand safety concerns and questions about the validity of Google's TAG Certification and MRC Brand Safety accreditation.

According to Google's stated policies, [Google complies with valid copyright requests](#) and frequently delists content as a result of copyright infringements. However, it appears Google permits repeated infringement offenders to continue monetizing their content through TrueView ads.

Furthermore, Google was observed delivering thousands of TrueView ads to declared bots running out of Google Cloud data center servers. YouTube has not allowed independent 3rd party measurement and verification tags to be applied to its ad inventory since 2016.

Fortune 500 brands' TrueView skippable in-stream ads were reported as being delivered on Russian websites, including "pravda.ru" - a website which

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including false claims related to the invasion of Ukraine.

Ad campaign placement reports regarding TrueView skippable in-stream ads include references to mobile apps and websites which either do not currently exist, or do not contain any ads whatsoever, raising the possibility that either Google's placement reporting tools have software bugs or are susceptible to deception by invalid ad traffic.

Lastly, in some instances, TrueView skippable in-stream ads from brands were reported as serving on delisted or side-loaded [Android apps](#) that are not allowed on the Google app Play Store. Some of these delisted or side-loaded apps are developed and maintained by software vendors based in US Treasury OFAC sanctioned countries such as Iran, which raises the question of whether Google's advertisers are inadvertently sending funds to Treasury sanctioned entities.

Adalytics shared an advanced copy of this report with Ebiquity, a major marketing and media consultancy which helps brands audit their ad buys. Ruben Schreurs, the Chief Product Office of Ebiquity noted:

"The research report by Adalytics is highly incriminating. Based on the findings and allegations represented within, I see this as a structural misrepresentation of advertising products at best, and downright fraudulent misleading practices at worst. If true, this will have major repercussions in the industry and lead to a significant negative impact on Google's perceived quality and reliability. Ebiquity works for over 75 of the top 100 brands, nearly all listed in this report as possibly being exposed, and we will initiate a large-scale review of this immediately. We thank Adalytics for their hard work in this and previous cases, and look forward to a detailed reply from Google."

A Member of the European Parliament (MEP) in Brussels - Paul Tang, also said:

*"Google deliberately makes itself the play doll of dictators, also dragging the European Parliament through the mud. The same Parliament that declared the Russian Federation in November 2022 a state sponsor of terrorism,*



*Google and Facebook is a highly opaque game of billions which threatens democracy."*

## Background

### What are TrueView ads?

According to Google's public online [documentation](#), TrueView in-stream ads are:

"YouTube video ad format that plays the ad before or during a YouTube video and allows the user to view the ad or skip it after 5 seconds."

#### **TrueView in-stream**

YouTube video ad format that plays the ad before or during a YouTube video and allows the user to view the ad or skip it after 5 seconds; only charged if the user watches 30 seconds or the full ad, whichever is shorter

*Source: [Google](#)*

According to a second part of Google's online [documentation](#), "TrueView in-stream" "ads play before or during another video from a YouTube partner."

According to a different part of [Google's online documentation](#):



advertisers more value because they only have to pay for actual views of their ads, rather than impressions.

Viewers can choose to skip the video ad after 5 seconds. If they choose not to skip the video ad, the YouTube video view count will be incremented when the viewer watches 30 seconds of the video ad (or the duration if it's shorter than 30 seconds) or engages with your video, whichever comes first.”

Display & Video 360 Help

Describe your issue

### Video ad formats in YouTube & partners line items

Learn more about the ad formats available through YouTube & partners line items below. You can also learn more about our [policies and technical specifications](#) .

#### TrueView in-stream and in-feed video ads

TrueView is Google’s proprietary cost-per-view, choice-based ad format that serves on YouTube, millions of apps, and across the web. TrueView gives advertisers more value because they only have to pay for actual views of their ads, rather than impressions.

Viewers can choose to skip the video ad after 5 seconds. If they choose not to skip the video ad, the YouTube video view count will be incremented when the viewer watches 30 seconds of the video ad (or the duration if it's shorter than 30 seconds) or engages with your video, whichever comes first. Video interactions include clicks to visit your website and clicks on call-to-action overlays (CTAs).

#### TrueView in-stream ads

When should I use it?	How does it work?	Where will the ads appear?	How will I be charged?
To promote video content alongside other videos on YouTube and partner sites and apps.	Your video ad plays before, during, or after other videos. After 5 seconds, the viewer has an option to skip the ad.	<ul style="list-style-type: none"> <li>• YouTube videos</li> <li>• Partners' sites, games, and apps</li> </ul>	You pay when a viewer watches 30 seconds of your video (or the duration if it's shorter than 30 seconds) or engages with your video, whichever comes first.

Source: [Google](#)

In another part of [Google’s online documentation](#), it is stated that:

“Skippable in-stream ads (formerly called TrueView) appear before, during or after YouTube videos. Viewers are shown the first five seconds, then have the option to 'skip', so the sooner you draw them in and keep them engaged,





## Stories told well, with time to be told.

Skippable in-stream ads (formerly called TrueView) appear before, during or after YouTube videos. Viewers are shown the first five seconds, then have the option to 'skip', so the sooner you draw them in and keep them engaged, the better. If a viewer skips before 30 seconds or until duration if it's shorter than 30 seconds, there is no charge – which makes skippable in-stream ads a terrific playground for creative experimentation.

Source: [Google](#)

According to a different section of Google's [public online documentation](#), "TrueView in-stream ads enable advertisers to reach users while they engage with videos across [sic] YouTube and the Google Display Network. Advertisers only pay when a user chooses not to skip their ad. Because users are given the option to skip the ad, a view will also increment the YouTube video view count." The [documentation](#) states that "Your video ad plays before, during, or after other videos," and the benefits of this ad include that an advertiser can "Reach and only pay for consumers who have chosen to connect with your brand."


[LEARN MORE](#)

#### Device Compatibility

- Tablet
- Mobile
- Desktop
- YouTube TV App

#### Ad Setup

- Ad Template

#### Assets

Companion banner: 300x60 (YouTube) or 300x250 (GDN) .JPG, static GIF, or PNG (150 KB)

#### Features

- Video URL (video uploaded to YouTube)
- Display URL
- Final URL

#### Connect to your audience with TrueView ads

This skippable format allows audiences to choose your brand. Your video ad plays before, during, or after other videos. After 5 seconds, the viewer has an option to skip the ad. TrueView in-stream video ads can appear on YouTube watch pages and on videos on partner sites and apps in the Display Network. You pay when a viewer watches 30 seconds of your video (or the duration if it's shorter than 30 seconds) or interacts with your video, whichever comes first.

#### When should I use it?

TrueView ads build brand awareness with guaranteed reach and viewability on YouTube across screens. Use this format when you have video content you'd like to promote before other videos on YouTube and across the Google Display Network.

NEW: TrueView ads build brand awareness driven by reach, engagement and industry-leading viewability on YouTube across screens. Use this format when you have video content you'd like to promote before other videos on YouTube and across the Google Display Network.

#### Benefits

- Reach and only pay for consumers who have chosen to connect with your brand.
- Impact their purchase decision by combining sight, sound & motion with a format that facilitates deeper engagement.
- Deliver results that you can measure and optimize.

[CREATE A TRUEVIEW VIDEO CAMPAIGN](#)

Source: [Google](#)

Furthermore, another section of [Google's public online documentation](#) states:

“TrueView and skippable video ads

Google Ads allows advertisers buying on YouTube to extend their budgets to sites and apps that partner with Google, including using our proprietary TrueView format. To be eligible to receive skippable ads, including TrueView ads, these additional policies apply:

- Video ad placements must be audible by default.
- Scroll-to-play ads are not permitted for TrueView.
- For mid-rolls, the video content's duration must be at least 10 minutes.”



### TrueView and skippable video ads

Google Ads allows advertisers buying on YouTube to extend their budgets to sites and apps that partner with Google, including using our proprietary TrueView format. To be eligible to receive skippable ads, including TrueView ads, these additional policies apply:

- Video ad placements must be audible by default.
- Scroll-to-play ads are not permitted for TrueView.
- For mid-rolls, the video content's duration must be at least 10 minutes.

Source: [Google](#)

Google's [policies also state that](#), for publishers utilizing the Google Ad Manager publisher ad server, publishers hosting in-stream video ads must:

“Use metadata and declarations to accurately describe inventory so that advertisers are correctly informed where their ads run.

- Video ad placements must either be audible by default or properly declared as a muted placement.
- Only serve in-stream video ads to valid in-stream placements, which excludes:
  - Video slideshows highlighting content available on a site without original video content.
  - Video ads in a display banner ad on a web page or app.
  - Video ads in the rail of the page, such as in a 300×250 slot on desktop.
  - Video ads in placements with no accompanying video content, apart from non-in-stream placements.
  - Video ads in placements that cycle between display ad units and video ads, whether or not there is accompanying video content.
  - In-banner video ads which do not load a video player.”

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and apps running on Google video partners .

To summarize, the key points documented by Google regarding TrueView skippable in-stream ads are:

1. appear before, during, or after [YouTube videos](#) or other video content
2. video ad content [must be hosted on YouTube](#)
3. the ads can serve on YouTube proper (e.g., the YouTube website youtube.com or the Android and iOS YouTube apps), but they can also serve on “millions of apps” and “across the web”\*
4. for Cost-per-view (CPV), advertisers only pay if the consumer engages with the ad, watches the full ad, or watches 30 seconds of a longer ad\*\*
5. for CPV, if a consumer chooses to click on the “skip” button before the video ad is over or before 30 seconds, the advertiser does not pay for a “view” of their video ad\*\*
6. TrueView in-stream ad placements must be audible by default
7. Scroll-to-play ads are not permitted for TrueView (generally speaking, this means the ads should not “auto-play” when a consumer visits a site or app, but rather, require some form of user initiated action beyond passive scrolling)

\* Note that various parts of Google’s public online documentation appear to be unclear. In [one page](#), Google states that YouTube TrueView ads will “appear before, during or after YouTube videos”, with no reference to ads which appear before or after video content other than YouTube videos, such as non-YouTube video content on partner websites. However, [other parts of Google’s documentation](#), state that the “Your video ad plays before, during, or after other videos”, “alongside other videos on YouTube and partner sites and apps”, without reference to whether or not those “other videos” on “partner sites” will be YouTube videos or non-YouTube videos. A third part of

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and allows the user to view the ad or skip it after 5 seconds.

\*\* Note that other parts of Google's public online documentation also appear to have different information about available billing strategies for in-stream TrueView ads. [One page in Google's online documentation](#) states that "You pay when a viewer watches 30 seconds of your video (or the duration if it's shorter than 30 seconds) or engages with your video, whichever comes first." This page only makes references to the Cost-per-view (CPV) billing model. However another page in Google's online documentation about "Skippable in-stream ads" [makes reference to four different](#) "available bidding strategies", including Cost-per-view (CPV), Target cost-per-action (CPA), Maximize conversions bidding, and Target cost-per-thousand impressions (tCPM).

### **What are Google Video Partners (GVP)?**

As alluded to earlier, Google makes it clear in its online documentation that TrueView skippable in-stream ads can serve on third party publishers, including "millions of apps, and across the web." These websites and apps are not necessarily websites or apps that host an embedded YouTube video player. Rather, these are sites that registered with Google as eligible ad inventory partners.

According to [Google's public online documentation](#),

"Google video partners are high-quality publisher websites and mobile apps where you can show your video ads to viewers beyond YouTube" (emphasis added).

"Video partner publishers are carefully vetted and must meet Google's inventory quality standards. Video partner publishers also need to follow the policies applicable to their ad management platform (which can include Google Ad Manager, AdMob, or AdSense). Our Video Ad Safety Promise, in which certain types of content can't be monetized for ads, applies to both YouTube and Google video partners." (emphasis added).



video partner sites and apps consist of leading publishers in games, sports, entertainment, news, and more.”

## Google Video Partners are automatically opt-ed in for new TrueView campaigns

Since [approximately July 2019](#), certain types of TrueView ad campaigns are opted-in to Google Video Partners by default. For certain types of TrueView campaigns, the media buyer must explicitly opt-out of having their ads delivered to GVP sites and apps, if they wish to only have their video ad served on YouTube.com and the YouTube mobile apps.

Furthermore, certain types of video ad campaigns do not allow the media buyer the option of opting out of GVP sites and apps. Specifically, [Google's online documentation states](#) that “As of September 30, 2021, new Video action campaigns that you create in Google Ads use Google video partners automatically [...] you won't be able to opt out of Google video partners for Video action campaigns.”

### About Google video partners

As of September 30, 2021, new [Video action campaigns](#) that you create in Google Ads use Google video partners automatically. With Video action campaigns, you can tell your brand's story with longer headlines and have access to top performing places like YouTube's home feed, watch page, watch next feed, and Google video partners — all within one campaign. To ensure you achieve the best performance across all Google networks, **you won't be able to opt out of Google video partners for Video action campaigns.**

Google video partners are high-quality publisher websites and mobile apps where you can show your video ads to viewers beyond YouTube.

Source: [Google](#)



Starting April 25, 2022, all existing TrueView for action campaigns will automatically upgrade to Video action campaigns. As part of the auto-upgrade, campaigns that are opted-out of Google video partners and YouTube Search will be updated to include those networks.

campaigns which previously chose to opt-out of the Google Video Partner network would be automatically opted into buying GVP as of April 25th, 2022.

To summarize, it appears that TrueView media buyers can choose to opt-out of buying on the GVP network for brand awareness and reach campaigns. Media buyers cannot opt out for any other campaign type including TrueView conversion campaigns. It appears the Google Video Partner network is mandatory for TrueView campaigns optimized to a performance goal.

## **Google Video Partners publishers claim NOT to fully control the insertion of TrueView ads on their websites or apps**

Multiple publishers interviewed by Adalytics claimed that while they can control the declaration of “in-stream” and “skippable” ad inventory slots on their own websites or apps via their Google Ad Manager dashboards, they do not have direct control over whether a TrueView skippable in-stream ad is inserted into a given ad slot on a website or app.

The publishers claimed they can make themselves “eligible” for TrueView skippable in-stream inventory, but it is ultimately Google’s servers which adjudicate when or how often to insert a TrueView ad into a particular ad slot.

## **What are “in-stream” versus “out-stream” video ads?**

According to [Google’s public online documentation](#),

“In-stream ads are ads that are played within the context of a video or audio stream in the same video or audio player that a user is viewing audio or video content.”

Another part of [Google’s online documentation states](#) that:

“valid in-stream placements, which excludes:



- Video ads in a display banner ad on a web page or app.
- Video ads in the rail of the page, such as in a 300×250 slot on desktop.
- Video ads in placements with no accompanying video content, apart from non-in-stream placements.
- Video ads in placements that cycle between display ad units and video ads, whether or not there is accompanying video content.
- In-banner video ads which do not load a video player.”

Furthermore, [Google’s documentation states](#) that:

“For in-stream ads, the sum duration of video content must exceed the sum duration of video ads.”

Lastly, Google’s [public online documentation](#) states that:

“In-stream video typically represents pre-, mid-, or post-roll ads shown within other video content (essentially these ads are blended into the primary video content). [...] Out-stream video is what is typically shown in "display" ads such as banners, interstitials, native (inline) ads, etc (in contrast to in-stream video, which is blended with other video streams).”

According to another piece of Google’s [documentation](#) on “Outstream video ad[s]”, outstream video ads “serve on partner sites and apps outside of YouTube”, and “the ads start with the sound off and the user can tap the ad to unmute it.”

## **Google’s online documentation states that games are not in-stream video placements**

Various parts of Google’s public, online documentation state that games are not considered to be valid in-stream placements. [Google’s “Video publisher](#)





## Video publisher policy

This policy applies to AdSense publishers, and Google Ad Manager Partners using Google Monetization (Preferred Deals, Programmatic Guaranteed, Private Auction and Open Auction), who monetize with video ads in auction, including ads shown in in-stream content, audio content, **or non-in-stream video placements (for example, games**, in-article, in-feed). Anywhere a video ad is eligible to serve (in a game, in a video player with in-stream video, or in a standalone non-in-stream placement) is considered the video ad placement.

Policy requirements are organized under these key principles:

Source: [Google](#)

Another part of [Google's documentation](#) states that “non-in-stream video ads, including ads in games”.

### Respect the user

Video ads must serve in an environment that is respectful of users' experience and time:

- For in-stream ads, the sum duration of video content must exceed the sum duration of video ads.
- **For non-in-stream video ads, including ads in games**, the amount of content experienced by users must exceed the sum duration of interstitial ads.

Source: [Google](#)

Furthermore, a Google article [titled](#) “Capture growing video budgets with out-stream video ads”, states that: “Out-stream video ad formats include:

In-feed & In-article — receive video demand (non-native) for display slots centrally positioned in the middle of non-video content, such as news articles and feeds. These formats are supported for mobile web, mobile app, and desktop inventory.

Interstitial ad units — rich, full-page ads in your app. Place them at natural breaks and transitions in your app's interface, such as at launch, after level

**Out-stream video ad formats include:**

[In-feed & In-article](#) – receive video demand (non-native) for display slots centrally positioned in the middle of non-video content, such as news articles and feeds. These formats are supported for mobile web, mobile app, and desktop inventory.

[Rewarded video](#) – a non-intrusive, short-form video ad format that creates a value exchange between a publisher and a user: users explicitly choose to watch a video ad to receive an award, such as access to a new game level, or the full version of an article or story. These ads are supported for mobile app inventory with mobile web currently in the beta stage.

[Interstitial ad units](#) – rich, full-page ads in your app. Place them at natural breaks and transitions in your app's interface, such as at launch, after level completion in a gaming app, or after an article view in a news app. These ads are supported for mobile app inventory.

[Native video ads](#) – you can customize the design of these ads so they match the look and feel of your app or site. You design these from the ground up: how they look, where they're placed, and how they work within your content. These ads are supported for desktop, mobile web, and app inventory.

Source: [Google](#)

**Google's online documentation states that misrepresentation of in-stream and out-stream video is a form of "invalid traffic"**

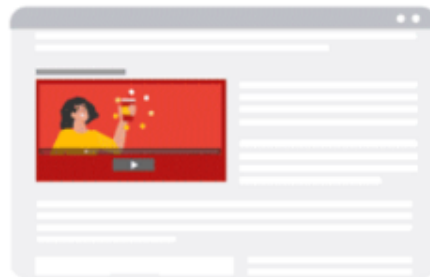
According to Google's [documentation](#) on the "Definition of invalid traffic", "Invalid traffic includes any clicks or impressions that may artificially inflate

Google's [public online documentation](#) on "What is invalid traffic?", states that "Misrepresentation of in-stream and out-stream video" is an example of invalid traffic

Specifically, [Google's documentation states](#) that:

"Out-stream video invalid traffic is the misrepresentation and display of in-stream video in an out-stream format. For example, this happens when in-stream video ads are shown in a banner ad -- an advertiser is led to believe that their ad was displayed in-stream with other video content, when in fact it was displayed in a different format."

In-stream video typically represents pre-, mid-, or post-roll ads shown within other video content (essentially these ads are blended into the primary video content). In-stream video can generate invalid traffic when it is primarily based on non-human traffic to videos, in which an in-stream video ad is marked or measured incorrectly as having been viewed by a real user.



Out-stream video is what is typically shown in "display" ads such as banners, interstitials, native (inline) ads, etc (in contrast to in-stream video, which is blended with other video streams). Out-stream video invalid traffic is the misrepresentation and display of in-stream video in an out-stream format. For example, this happens when in-stream video ads are shown in a banner ad -- an advertiser is led to believe that their ad was displayed in-stream with other video content, when in fact it was displayed in a different format.



According to Google's [public online documentation](#),

“Our Video Ad Safety Promise is that certain types of content can't be monetized for ads on YouTube and Google video partners: we'll automatically apply exclusions to prevent your ads from showing on the most controversial content, such as terrorist acts, nudity, and recent sensitive events.”

The “Video Ad Safety Promise” [states that](#) “Your ads automatically will be excluded from showing on the following types of content, no matter what inventory type you choose.”

This list includes, “Content discussing terrorism or sensitive current events like war, death, or tragedy”.

### Video Ad Safety Promise and inventory type content details

#### Video Ad Safety Promise

Your ads automatically will be excluded from showing on the following types of content, no matter what inventory type you choose.

Video content	Expanded inventory	Standard inventory	Limited inventory
Profanity in the title or thumbnail image, or profanity used repeatedly or throughout	Excluded	Excluded	Excluded
Full nudity, exposed nipples, animal mating, sexual abuse, or sexual content in the thumbnail	Excluded	Excluded	Excluded
Content showing abusing, buying, making, selling, or finding drugs	Excluded	Excluded	Excluded
<b>Content discussing terrorism or sensitive current events like war, death, or tragedy</b>	Excluded	Excluded	Excluded

Source: [Google](#)



placements:

YouTube campaigns

## Third-party measurement on YouTube



**Google does not accept third-party tracking pixels for YouTube measurement.** If you want to use a third-party measurement vendor (for example, Nielsen) for your video ads, you'll need to enable measurement within the buying door. Failure to do so is subject to disruptions to third-party measurement.

Screenshot from Google's public online documentation

According to Google's public online documentation on "[Third-party measurement on YouTube](#)", "Google does not accept third-party tracking pixels for YouTube measurement."

YouTube does have a [YouTube Measurement Program \(YTMP\)](#), which includes ad verification companies like Integral Ad Science (IAS) and DoubleVerify. However, it appears that these measurement partners have to rely on aggregated, server-to-server data transfers - via the "[YouTube data feed](#)" in order to execute their "independent" measurement analytics. The vendors are not able to place their own, independent pixels or code directly into the YouTube ad serving environments.

The distinction is important, as it means the YouTube Measurement Program partners are likely not able to independently verify or measure the environments in which the YouTube ads are appearing. Rather, these measurement vendors likely must rely on data that YouTube itself collects and then makes available to them.



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network at all.

In 2020, the [Wall Street Journal \(WSJ\)](#) reported that “Google wants to substantially limit the information a key auditor of YouTube can share about the risks of advertising on the video service”. [WSJ wrote](#) that an auditor “is refusing to sign a contract that would prevent it from reporting to clients when ads have run in videos with sensitive subject matter, including hate speech, adult content, children's content, profanity, violence and illegal substances, according to an email the firm sent over the weekend to ad agencies.”

### **Prior brand safety concerns regarding YouTube ad inventory**

There have been dozens of documented news articles about how YouTube has allowed major brands' ads to serve (and possibly, fund) videos from terrorist organizations or beheadings.

In March 2015, [NBCNews reported](#) that

“Several major U.S. companies were apparently caught unaware that ads featuring their products were playing before Islamic State-related videos recently uploaded to YouTube. Proctor & Gamble, Toyota and Anheuser-Busch were among the companies with pre-roll ads running before videos associated with the militant Islamist group, also known as ISIS or ISIL”

In February 2017, The [Times of London reported that](#) many mainstream brands were unwittingly funding white supremacists and Islamic extremists by advertising alongside their videos. The Times article stated that:

“Advertisements for hundreds of large companies, universities and charities, including Mercedes-Benz, Waitrose and Marie Curie, appear on hate sites and YouTube videos created by supporters of terrorist groups such as Islamic State and Combat 18, a violent pro-Nazi faction.”

The Times [reported that](#), “Sandals Resorts, the luxury holiday operator, is advertised next to a video promoting al-Shabaab, the East African jihadist group affiliated to al- Qaeda. Last night a Sandals spokeswoman said that it

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sensitive.

Furthermore, the [Times article states](#) that British Members of Parliament “called on Google to explain why hundreds of extremists were making money from advertising on YouTube.”

Marc Pritchard, the top marketer at Procter & Gamble Co., [told the CEO of YouTube](#) in 2018 “You went to a large galaxy that was beyond what anyone had ever seen [...] And I don’t think you’ve realized the impact you’ve had.”

In 2018, a [CNN investigation found](#) “ads from over 300 companies and organizations — including tech giants, major retailers, newspapers and government agencies — ran on YouTube channels promoting white nationalists, Nazis, pedophilia, conspiracy theories and North Korean propaganda.”

“[Companies](#) such as Adidas, Amazon, Cisco, Facebook, Hershey, Hilton, LinkedIn, Mozilla, Netflix, Nordstrom and Under Armour may have unknowingly helped finance some of these channels via the advertisements they paid for on Google-owned YouTube.”

“U.S. [tax dollars](#) may have gone to the channels, too. Ads from five U.S government agencies, such as the Department of Transportation and Centers for Disease Control, appeared on the channels.”

“[Many](#) of the companies that responded to CNN said they were unaware their ads had been placed on these channels and were investigating how they ended up there.”

“[Ads](#) from the Washington Post and New York Times appeared on far-right and conspiracy channels like Black Pigeon Speaks and some run by InfoWars.”

"It [appears](#) that YouTube did not follow its own protocols and categorize these videos properly," the New York Times [told](#) CNN. The paper said its ads should only appear on a list of pre-approved sites. If the channels are



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conspiracy.

## **YouTube is Media Ratings Council (MRC) and Google is TAG accredited for brand safety**

YouTube **received** “content-level brand safety accreditation” from the Media Rating Council.

Furthermore, Google is (as of May 2023) **enrolled** in the Verified by TAG program, and has achieved a “Brand Safety Certification” seal. The **Trustworthy Accountability Group** (TAG) is a “certification program” that was “created by the American Association of Advertising Agencies (4A's), Association of National Advertisers (ANA), and Interactive Advertising Bureau (IAB).”

The declared **purpose** of the **TAG Brand Safety Certification** is “to significantly reduce the risk of the misplacement of advertising on digital media properties of all types, thereby upholding Brand Safety and protecting the integrity of digital advertising.”





Google is currently enrolled in the [Verified by TAG](#) program and its TAG-ID status is **active**.

This company has achieved the [Certified Against Fraud](#) seal.

- This company achieved the seal:
  - through independent validation by a third-party auditor;
  - meeting requirements in the categories of direct seller, buyer and intermediary.
- This seal applies to the company's global operations.
- The seal expires on March 1, 2024.

This company has achieved the [Certified Against Malware](#) seal.

- This company achieved the seal:
  - through independent validation by a third-party auditor;
  - meeting requirements in the categories of direct seller, buyer and intermediary.
- This seal applies to the company's global operations.
- The seal expires on March 1, 2024.

This company has achieved the [Brand Safety Certification](#) seal.

- This company achieved the seal:
  - through independent validation by a third-party auditor;
  - meeting requirements in the categories of intermediary and seller.
- This seal applies to the company's global operations.
- The seal expires on March 1, 2024.

TAG's Brand Safety Certification [states](#) that any participating company acting as a seller or intermediary must:

- disclose “staff and/or tools/technology used to review and/or flag content as brand safe”
- disclose “staff and/or tools/technology used to review or flag content disclosing from media properties associated with piracy.”
- “must employ pirate mobile app filtering for all advertising displayed in a mobile app environment.”
- “A participating company acting as a direct buyer, intermediary, vendor or seller should employ a TAG-recognised content taxonomy for harmful content” and “Digital advertisements may not be displayed in association with any content categories” such as “Online Piracy”, “Sensitive Social Issues”, “Death Injury or Military Conflict”.

This research study relied on several independent sources of data to analyze the placement and audio-visual media quality of various TrueView skippable in-stream ads, as well as to assess marketers expectations about those ad placements.

Adalytics used a variety of open-source data sources, as well as logs from DeepSee.io's ad-quality crawlers, to create a list of Google Video Partners whose video ad serving experience is inconsistent with Google's public written policies, such as out-stream video players that are muted, auto-playing or not visible to the consumer. This exclusion list identified tens of thousands of websites and mobile apps which, for a combination of reasons, do not appear to be consistent with the TrueView in-stream ad format.

Secondly, Adalytics used the assembled "exclusion list" of ineligible Google Video Partner publishers, and compared this list against TrueView ad buy placement reports from advertisers, including Fortune 500 brands' TrueView skippable in-stream campaigns. This analysis was performed to determine:

1. How much of each brands' TrueView in-stream budget went to YouTube.com, versus third party GVP sites and apps?
2. Of the ad budget budget that was delivered against GVP sites and apps, how much of that budget was delivered against sites or apps that are not consistent with the TrueView in-stream ad format?

Lastly, Adalytics surveyed several dozen media buyers from brands and media agencies to determine whether the observed placements were consistent with their expectations for TrueView skippable in-stream campaigns.

## Use of open-source intelligence and digital forensics

Adalytics isolated several [open-source intelligence](#) (OSINT) [selectors](#) that can be used to identify when Trueview skippable in-stream video ads are being served on a consumer's browser or phone. These are digital forensics



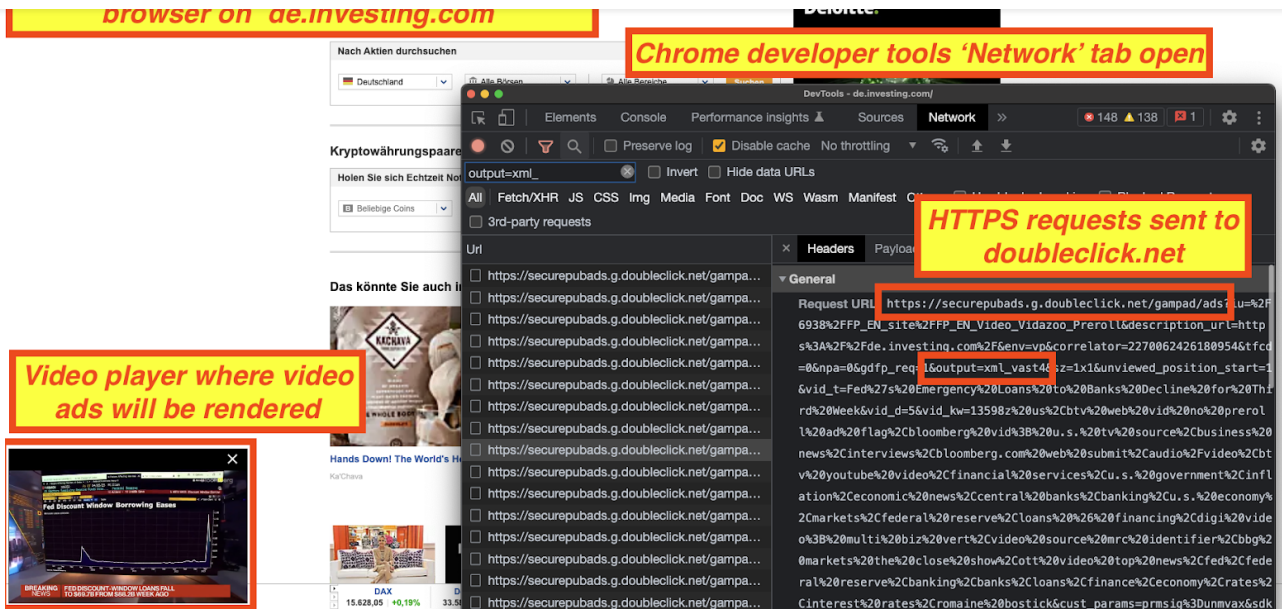
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whether that video ad is a TrueView skippable in-stream ad.

## Digital forensics to identify TrueView skippable in-stream video ads

When a TrueView skippable in-stream video ad is delivered to a consumer's device, the ad creative source code returned from Google's servers contains several specific signatures.

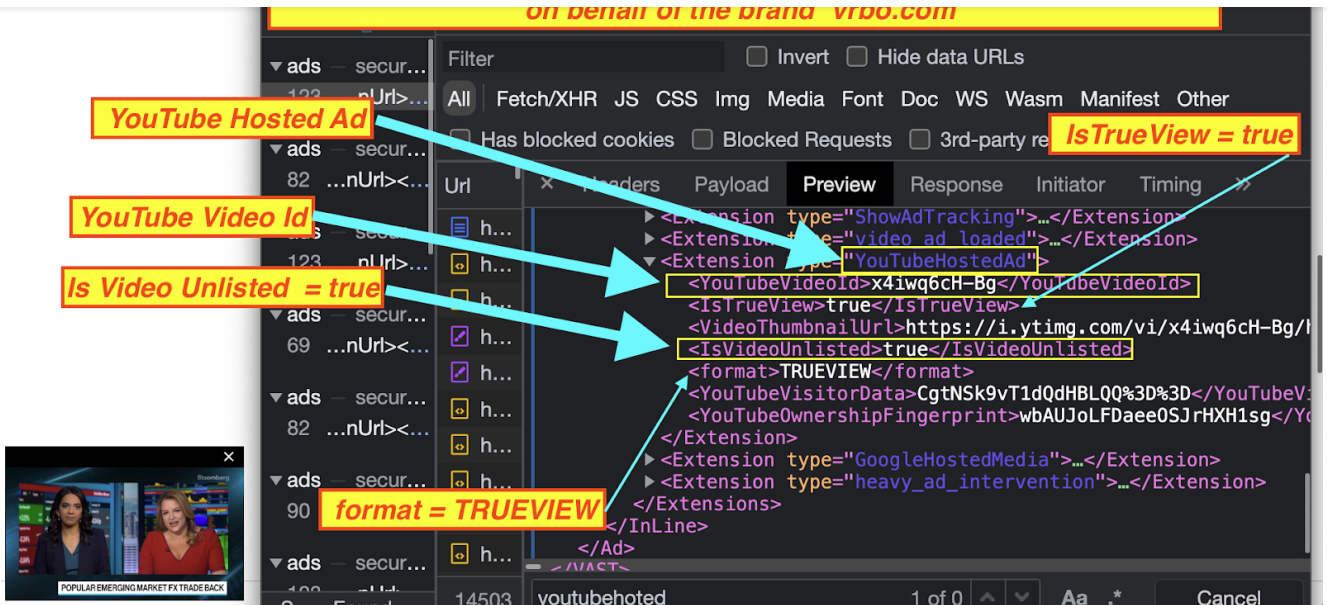
A publisher, such as foxnews.com or huffpost.com, configures the [Google Publisher Tag](#) or Google Mobile Ads SDK, a piece of code, to initiate HTTPS requests to Google's servers to return ads from [Google Ad Manager](#) or AdSense. Any consumer or member of the public can view these sequence of some of these HTTPS requests by opening a browser's [developer tools](#), switching to the "Network" tab, and filtering for HTTPS requests being sent to an endpoint such as "securepubads.g.doubleclick.net/gampad/ads". When video ads are fetched, these HTTPS requests will often contain the query string parameter "output" set to the value of "xml\_vast4". VAST (Video Ad Serving Template) [is a](#) "VAST is a specification defined and released by the Interactive Advertising Bureau that sets a standard for communication requirements between ad servers and video players in order to present video ads.



Screenshot showing Chrome Developer Tools' "Network" tab open on a German website. The developer tools are filtered for HTTPS requests from the consumer's browser going to doubleclick.net to fetch a video VAST ad.

Sometimes, but not always, the HTTPS request sent to "securepubads.g.doubleclick.net/gampad/ads" will return a video ad creative to serve. In a subset of occasions, that video ad creative VAST file will include references to the video file being a "YouTubeHostedAd", including the "YouTubeVideoid". One can copy the "YouTubeVideoid" and use it to find the original video on YouTube.com. Usually (but not always), these video ads are marked as "unlisted" in both the video ad and on YouTube.com. This means the given video will not appear in YouTube.com search results or by checking a given YouTube channel's public list of videos.

For example, the screenshot below from a consumer's Chrome Developer Tools' Network tab shows a video VAST ad creative being served, on behalf of the travel brand Vrbo (which is owned by Expedia Group). One can see that the Vrbo video ad is marked as a "YouTubeHostedAd", and that the "YouTubeVideoid" is equal to "x4iwq6cH-Bg". If a consumer copies that ID value and appends it to the URL "<https://www.youtube.com/watch?v=>", they can find and view the unlisted Vrbo video. This Vrbo video is listed at <https://www.youtube.com/watch?v=x4iwq6cH-Bg> (archived link here).



Screenshot of Chrome Developer Tools Network tab on de.investing.com, a German language website. The screenshot shows a video VAST ad creative file for the travel brand Vrbo, and there are references to the video being a YouTube hosted ad. The YouTube Video ID is "x4iwq6cH-Bg".



Screenshot of a Vrbo YouTube video which served as a TrueView video ad on [de.investing.com](https://de.investing.com). The Vrbo video is marked as “Unlisted” on youtube.com. The YouTube Video ID is “x4iwq6cH-Bg”.

The significance of the “YouTubeHostedAd” label in the source code of these video ad files is that, (according to [Google’s public online documentation](#)), while “video ads can appear on YouTube and across websites and apps running on Google video partners”, the “video ad content must be hosted on YouTube” (emphasis added). In other words, even if a YouTube video ad is being served on a 3rd party apps such as [huffpost.com](https://huffpost.com) or [dostor.org](https://dostor.org), the video ad itself must be uploaded by the advertiser to YouTube first.

several parameters which seem to indicate that the ad is being run as part of a TrueView campaign.

Specifically, some video VAST tags include the parameter "IsTrueView", which can be set to either "true" or "false", and the parameter "format", which can be set to "TRUEVIEW" or other possible values such as "SKIPPABLE" or "BUMPER".

```

x Headers Payload Preview Response Initiator Timing >>
  <Extension type="metrics">...</Extension>
  <Extension type="ShowAdTracking"></Extensions>
  <Extension type="
    <IsTrueView>true</IsTrueView>
    <VideoThumbnailUrl>https://i.ytimg.com/vi/7wxFbY9Jw_I/h
    <IsVideoUnlisted>true</IsVideoUnlisted>
    <format>TRUEVIEW</format>
    <YouTubeVisitorData>CgtoY0pJZXJvZHd4QQ%3D%3D</YouTubeVis
    <YouTubeOwnershipFingerprint>wbAllJolFDaee0S1rHXH1sq</Yo
  </Extension
  <Extension type="GoogleHostedMedia">...</Extension>

```

Screenshot of a Consumer Cellular YouTube video which served as a TrueView video ad on lebanonfiles.com. The video ad file is marked as "IsTrueView" = "true" and "format" = "TRUE"

The video VAST tags often also include other useful information, such as the "VisibleUrl" field which details for which brand or advertiser the given YouTube video ad is for.

```

  <Extension type="activeview">...</Extension>
  <Extension type="AdSense">
    <AttributionText>Ads by Google</AttributionText>
    <AttributionUrl>https://www.google.com/url?ct=abg&q=
    <PreviousAdInformation>425caUHeJ0UKEwi35KzroaT-AhU_9
    <VisibleUrl>consumercellular.com</VisibleUrl>
    <ConversionUrl>https://googleads.g.doubleclick.net/p

```

"VisibleUrl" field lists the name of the advertiser for the video



instream video is watched to completion and when a consumer decides to skip a video ad before it finishes running (respectively).

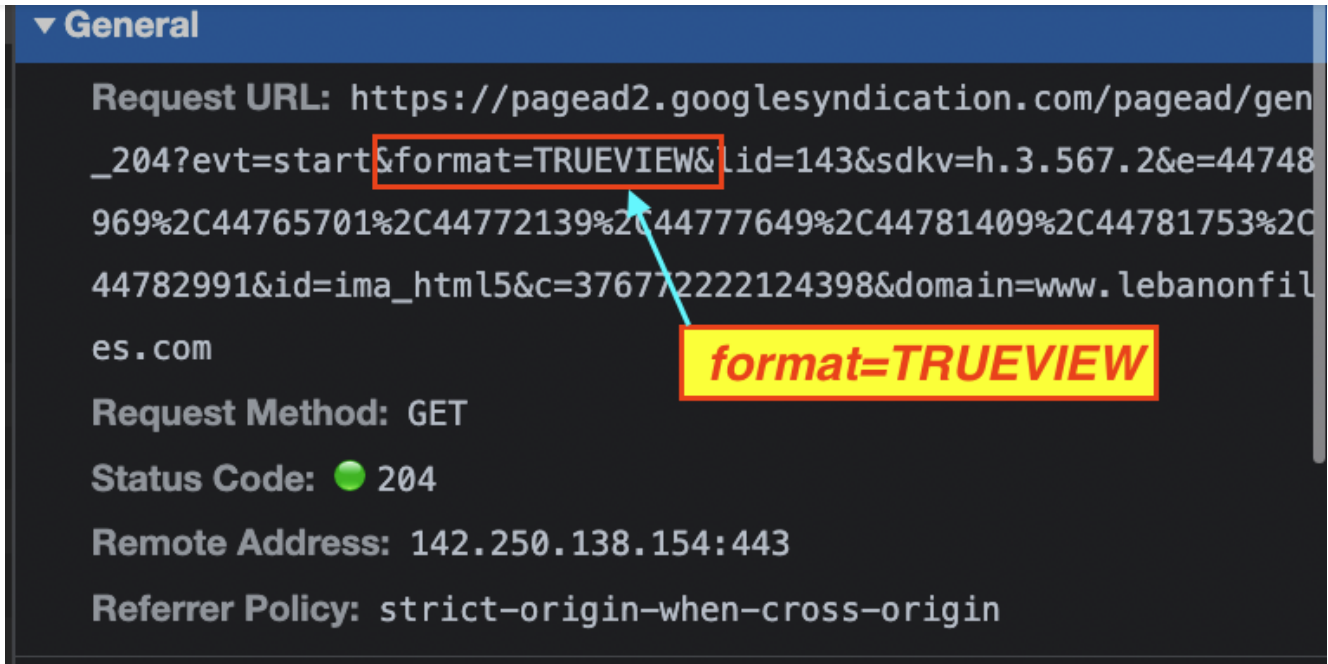
```

▼ <Extension type="AdSense">
  <AttributionText>Ads by Google</AttributionText>
  <AttributionUrl>https://www.google.com/url?ct=abg&q=https://www.gd
  <PreviousAdInformation>425caUHeJQUKEwi35Kzrqat-AhU_9CgFHYt-B1EQARg
  <VisibleUrl>consumercellular.com</VisibleUrl>
  ▼ <CustomTracking>
    <Tracking event="feedbackLike">https://googleads.g.doubleclick.
    <Tracking event="feedbackDislike">https://googleads.g.doublecli
    <Tracking event="abandon">https://googleads.g.doubleclick.net/p
    <Tracking event="watchTime">https://googleads.g.doubleclick.net
    <Tracking event="instreamAdComplete">https://googleads.g.double
    <Tracking event="companionClick">https://googleads.g.doublecli
    <Tracking event="companionImpression">https://googleads.g.doubl
    <Tracking event="annotation_start">https://googleads.g.doublecl
    <Tracking
    <Tracking
    <Tracking event="endScreenClick">https://googleads.g.doublecl
  </CustomTracking>
  ▶ <UI>...</UI>

```

Furthermore, when one of these YouTube-hosted TrueView ads renders on a consumers device, the browser or mobile app will send out various event tracking HTTPS requests to the endpoint `pagead2.google syndication.com`, with a query string parameter called `evt` ("event") which can be set to values such as "start", "showui", "skip", or "complete". These HTTPS requests will occasionally include a parameter for `format`, which can be set to "TRUEVIEW".





Screenshot of Chrome Developer Tools' Network tab, showing an HTTPS request sent to the endpoint 'pagead2.googlesyndication.com', with the query string parameter "format=TRUEVIEW"

To summarize, there are a number of informative digital forensics identifiers that can be used to identify when YouTube TrueView ads are served on websites or apps based on HTTP network traffic data.

These include:

- HTTPS requests where the referer request header is "imasdk.googleapis.com" (the Google IMA SDK video player), that were sent to the endpoint "pubads.g.doubleclick.net/gampad/ads", with the query string parameter "output" set to "xml\_vast", where the response is a video VAST tag that contains the strings "<format>TRUEVIEW</format>" and "<IsTrueView>>true</IsTrueView>"
- HTTPS requests where the referer request header is "imasdk.googleapis.com", that were sent to "pagead2.googlesyndication.com/pagead/gen\_204?evt=start", where the query string parameter "format" is set to "TRUEVIEW"

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## Google Ad Manager

Many publishers utilize Google's publisher ad server - known as Google Ad Manager (GAM) to serve ads on their websites and apps. Many of the publishers also utilize the [Google Interactive Media Ads \(IMA\)](#) software development kit (SDK) to integrate multimedia ads into their websites and apps.

Google Ad Manager [allows publishers](#) to traffic video line items and video creatives that request video assets via the Video Ad Serving Template (VAST). A [VAST ad tag](#) URL is used by a player to retrieve video and audio ads.

According to Google's online documentation, while "Ad Manager's main responsibility is to serve the VAST that contains the video media files, third-party VAST, tracking metrics, and so forth, it's not part of any additional processes once the VAST is delivered to the requesting source."

"IMA SDKs can request ads from any VAST-compliant ad server and manage ad playback".


In layman's terms, one could say that the GAM software is responsible for getting the video ad code from Google's servers, while the IMA SDK actually renders the video and the associated play, mute, and pause buttons. The VAST tag contains the code instructions for the specific video ad.

Google's Ad Manager public documentation defines specific parameters which publishers can configure when sending requests to Google's servers for specific video or audio ads. For example, an app or website publisher can configure a parameter called "afvsz", which encodes the "ad sizes that can be displayed in the video ad slot."

There are two parameters that are of particular significance with regards to the delivery of YouTube video ads on Google Video Partner (GVP) sites and apps.

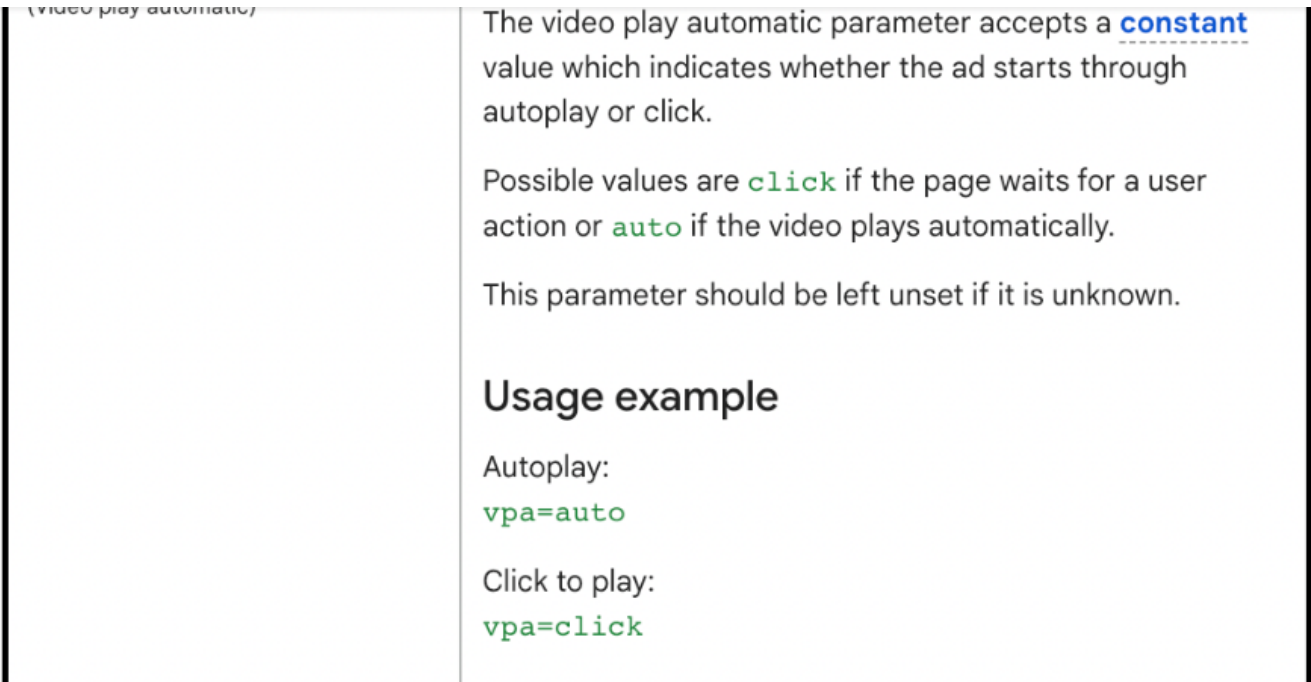


parameter accepts a constant value which indicates whether the ad playback starts while the video player is muted.” If “vpmute” is set to “1”, this means the the video player is muted, while if “vpmute” is set to “0”, it means the video player where the video ad will serve is unmuted (audible).

<p><b>vpmute</b></p> <p>(Video play mute)</p>	<p><i>Recommended per MRC</i> <a href="#">Video Measurement Guidelines</a></p> <p>The muted video parameter accepts a <u>constant</u> value which indicates whether the ad playback starts while the video player is muted.</p> <p>This parameter should be left unset if it is unknown.</p> <p><b>Usage example</b></p> <p>Muted: <code>vpmute=1</code></p> <p>Unmuted: <code>vpmute=0</code></p> <p><b>Requirement</b></p> <p> Recommended for <a href="#">Programmatic monetization</a></p>
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Screenshot of Google’s online documentation for Google Ad Manager, showing the definition of the “vpmute” parameter.

The second Google Ad Manager parameter of interest is “vpa”, which stands for “video play automatic”. According to Google’s [online documentation](#), “The video play automatic parameter accepts a constant value which indicates whether the ad starts through autoplay or click. Possible values are click if the page waits for a user action or auto if the video plays automatically.” The “vpa” parameter can be set to “auto”, which means the video will “autoplay”, or “vpa” can be set to “click”, which means the video is “click to play” (e.g., the user has to click to initiate video playback).



(video play automatic)

The video play automatic parameter accepts a [constant](#) value which indicates whether the ad starts through autoplay or click.

Possible values are `click` if the page waits for a user action or `auto` if the video plays automatically.

This parameter should be left unset if it is unknown.

### Usage example

Autoplay:  
`vpa=auto`

Click to play:  
`vpa=click`

Screenshot of Google's online documentation for Google Ad Manager, showing the definition of the "vpa" parameter.

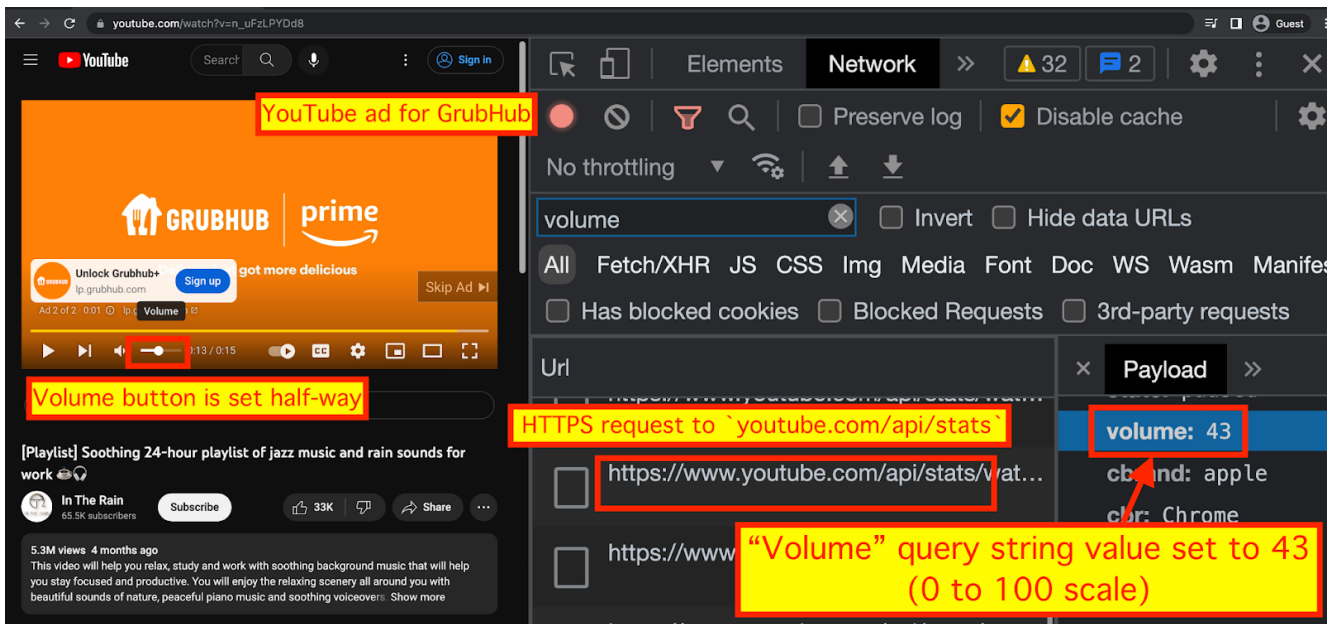
These two Google Ad Manager parameters which are sent to Google's servers when a publisher requests a video ad are significant in how they relate to the delivery of YouTube TrueView video inventory. As discussed in a previous section of this report, Google's public [online documentation](#) specifically states that for YouTube TrueView video ads, "Video ad placements must be audible by default" and that "Scroll-to-play ads are not permitted for TrueView."

This suggests that Google's servers should never serve a YouTube TrueView ad if the "vpmute" parameter is set to "1" or if the "vpa" parameter is set to "auto", as such conditions would be incompatible with the required specifications for YouTube TrueView ads.

## Filtering for muted YouTube video ads

As mentioned before, TrueView ads are a type of YouTube ad, and they generally serve via Google's IMA SDK when rendered on third party websites and apps that are part of the Google Video Partner network.

One of these metrics is the volume setting of the consumer’s browser. In the screenshot below, one can observe a YouTube video ad serving on behalf of the food delivery company GrubHub. This video ad is serving with the consumer’s audio button on YouTube.com set mid-way along the slider scale. On the right of the screen, the consumer can observe their browser making HTTPS requests to YouTube’s servers, recording that the volume player state at that moment was set to “43”, out of a potential scale of 0 to 100.



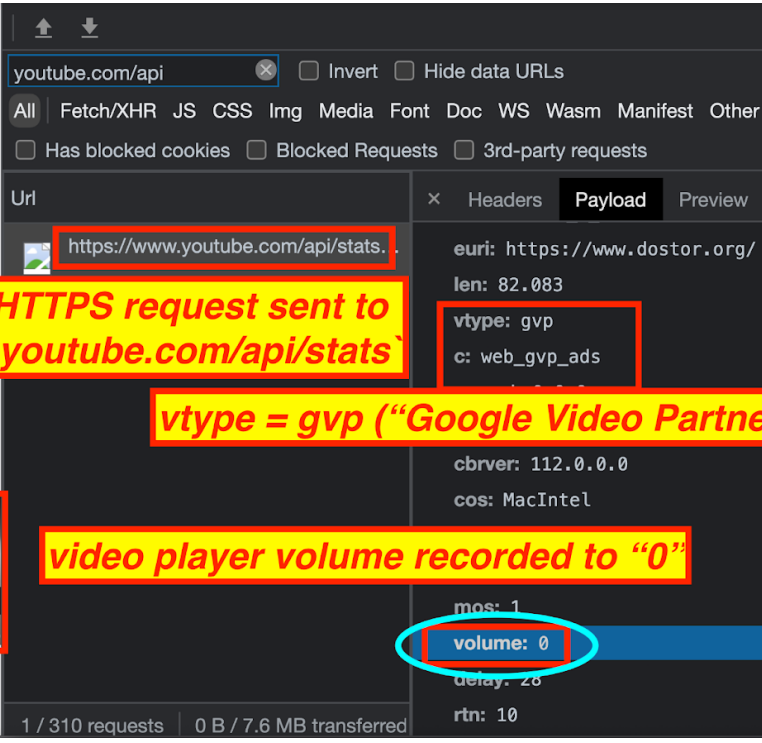
Screenshot showing a YouTube ad playing, with the “volume” query string parameter recorded as being set to “43”, out of a scale of 0 to 100.

Similarly, when YouTube hosted video ads serve on 3rd party GVP sites and apps, one can also observe HTTPS requests being sent to YouTube’s servers showing the volume state set to a value between 0 (muted) and 100 (maximum volume).

وفي وقت سابق، نشر مدفيدف على حسابه باللغة الإنجليزية على "تويتر"، أن بولندا "لا جدوى من استمرار العلاقات الدبلوماسية معها. هذه الدولة لا ينبغي أن توجد معنا، طالما لا يوجد أحد في السلطة يرفض منح معاداة روسيا، وأوكرانيا مليئة بالمرترقة البولنديين الذين يجب القضاء عليهم بلا رحمة مثل الفئران النتنة". وفي وقت لاحق، قال الدبلوماسي الروسي إن عرض هذه التفريفة تم تقييده.

وكتب مدفيدف على حسابه باللغة الروسية على "تويتر": "قامت إدارة تويتر بتقييد عرض آخر تفريفة لي في الحساب باللغة الإنجليزي بسبب انتهاك بعض القواعد. وفي الوقت نفسه، يبدو أن التفريفات التي تدعو إلى تدمير روسيا ضمن قواعد الموقع.. لذلك، اقرأوا تفريفتي مرة أخرى هنا.. ماذا عن ذلك يا إيلون ماسك".

نشر مدفيدف أيضا تفريفة مكتوبة مسبقا باللغات الروسية والإنجليزية والبولندية.



youtube.com/api

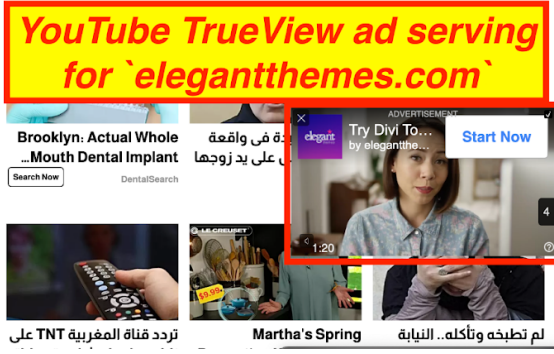
https://www.youtube.com/api/stats.

**HTTPS request sent to `youtube.com/api/stats`**

**vtype = gvp ("Google Video Partner")**

**video player volume recorded to "0"**

volume: 0



**YouTube TrueView ad serving for `elegantthemes.com`**

Brooklyn: Actual Whole Mouth Dental Implant

Try Divi To... Start Now

لم تطبخه وتأكله.. النياية

Screenshot of a YouTube TrueView ad for elegantthemes.com serving on dostor.org, showing the "volume" query string parameter set to zero as the video plays in a completely muted state

These YouTube API HTTPS requests serve as an additional useful selector to identify YouTube video ads serving in a muted state on third party sites. The specific selector in question is:

- HTTPS requests where the referer request header is "imasdk.googleapis.com" (the Google IMA SDK video player), that were sent to the endpoint "youtube.com/api/stats", with the query string parameter "volume" set to "0"

**Searching through internet archives**

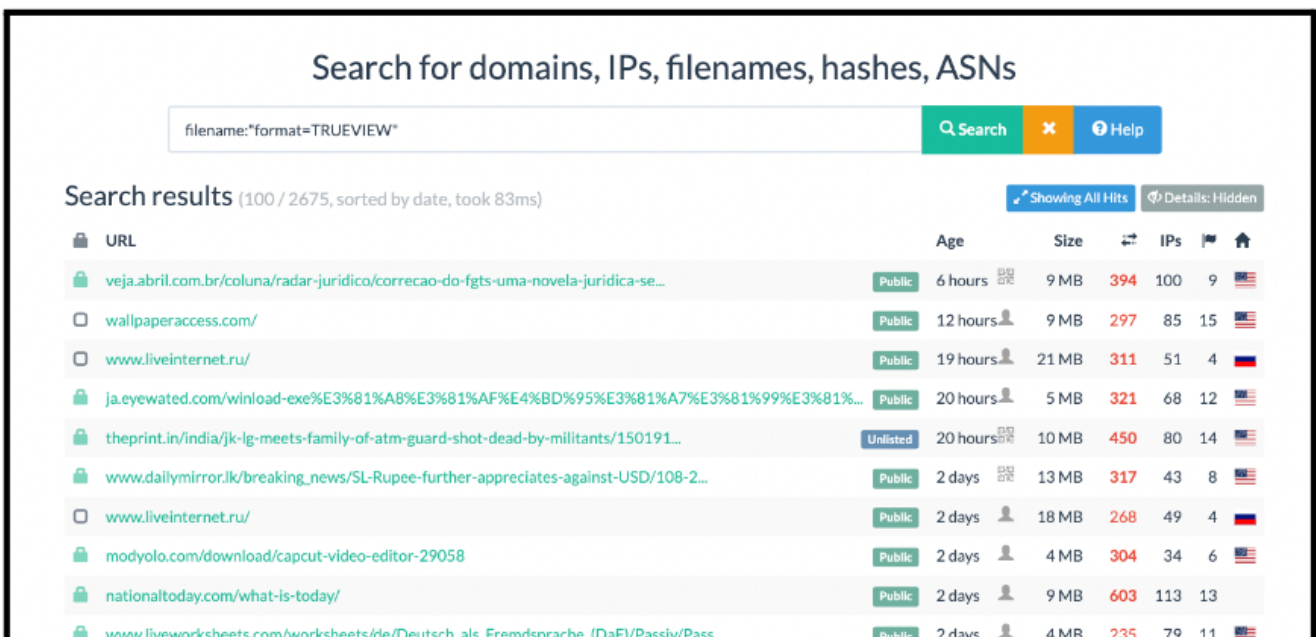
Using the aforementioned digital selectors and identifiers, several public and private web browsing archives were searched for instances where YouTube TrueView video ads were served on Google Video Partner (GVP) publishers. These archives include instances of crawlers or emulators scanning various online environments, and recording all the data that was sent over each respective automated browsers' network layer.

metrics and data about the browsing experience on each page. HTTP Archive’s test agents are run from Google Cloud data centers across the US. The HTTP Archive collects these HAR files, parses them, and populates various tables in BigQuery, where one can then search through the HTTP request data to identify instances of YouTube TrueView ads being delivered to bots. HTTP Archive has crawl data going back many years, since at least 2016.

The archives analyzed in this research study included:

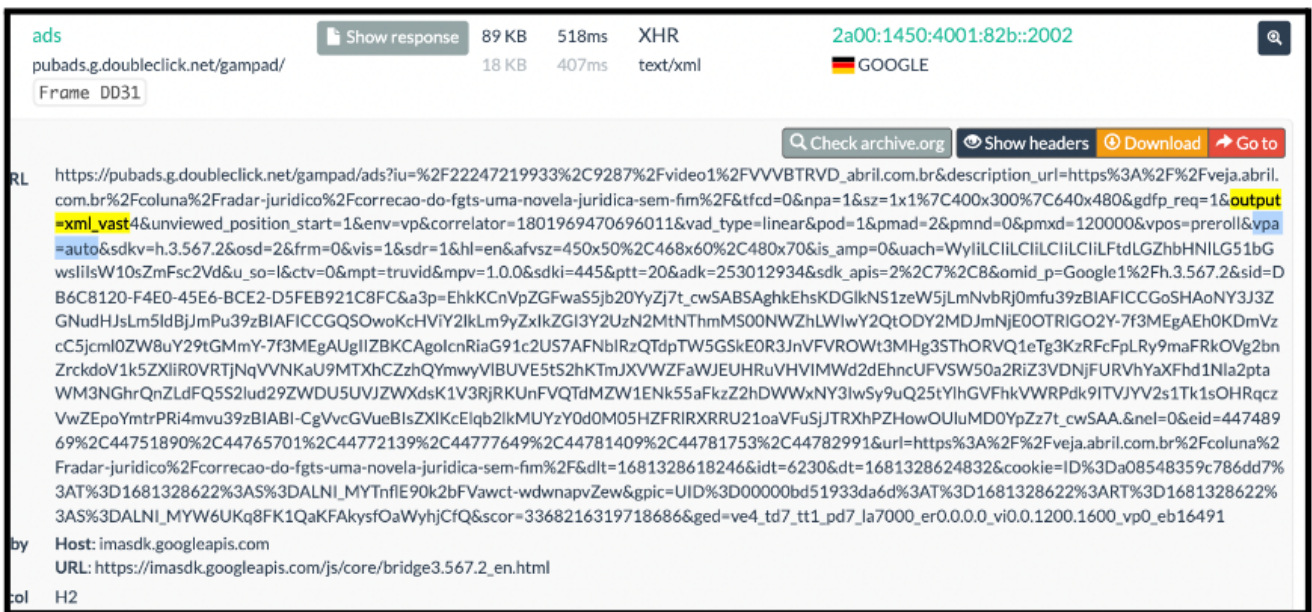
- The [HTTP Archive](#)
- [URLScan.io](#)
- [Common Crawl](#)
- Crawler data from publisher quality intelligence vendor [DeepSee.io](#)

As another example, a user can use the URLScan.io (a cybersecurity headless chrome crawler service) to search for page captures where the page the crawler visited sent out HTTPS requests to “https://pagead2.google syndication.com/pagead/gen\_204”, with the “format=TRUEVIEW” query string parameter.



There appear to be thousands of instances where YouTube TrueView ads were served to the URLScan.io bot.

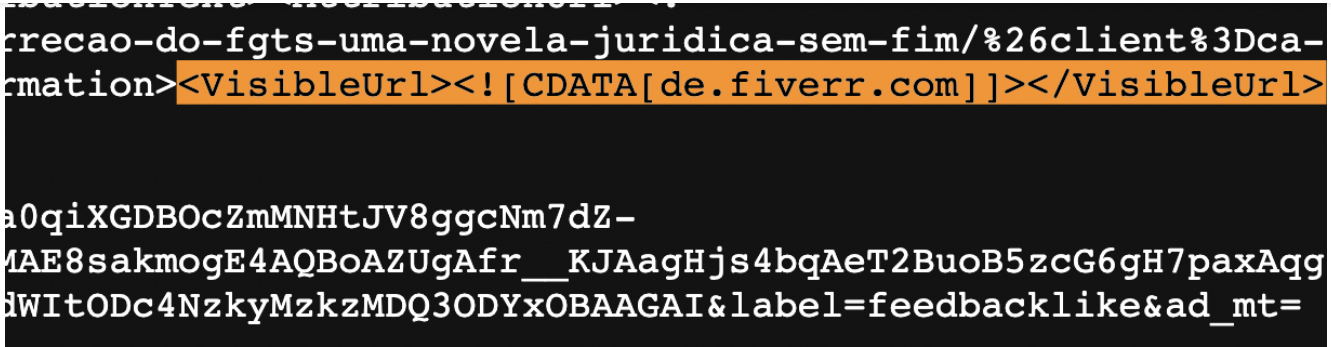
Furthermore, one can analyze each identified URLScan.io crawl session and filter for HTTPS requests that were sent to the Google Ad Manager endpoint "pubads.g.doubleclick.net/gampad/ads", where there is a query string parameter "output=xml\_vast4". One can then analyze the VAST tag that Google's serves returned to the URLScan.io bot. For example, in the screenshot below one can see that on April 12th, 2023, URLScan.io's bot crawled a Brazilian website "veja.abril.com.br" from a German IP address. The bot was served an 89 KB VAST video ad.



Screenshot of an HTTPS request sent to Google Ad Manager during a URLScan.io crawl of a Brazilian website on April 12th, 2023

One can then analyze the response sent back from Google's ad servers (specifically, the 89 KB video VAST ad code). The VAST tag shows the ad is for YouTube video ID "NITwtaNN6QU", which is a video for the freelancer hiring platform Fiverr (https://www.youtube.com/watch?v=NITwtaNN6QU). Furthermore, analysis of the VAST tag's "VisibleUrl" field confirms the video ad served to the URLScan bot on April 13th on the Brazilian website was for "de.fiverr.com" (Fiverr's German sub-domain).





Screenshot of an 89 KB VAST tag served to a URLScan.io crawler, [showing](#) that the Visible for the video ad is for “de.fiverr.com”

Of particular interest in this analysis is the fact that the HTTPS request sent to GAM to retrieve this Fiverr video ad creative contained the query string parameter “vpa=auto”. As discussed earlier, this query string parameter indicates that the video player where the ad will render will play automatically, without the page waiting for user action. As discussed in the Background section of this report, Google’s [public online documentation](#) explicitly states that “Scroll-to-play ads are not permitted for TrueView.” It is not clear why the Google Ad Manager servers returned a YouTube TrueView ad for Fiverr, even when the servers were explicitly informed that the video player auto-plays without user action.



Screenshot of an HTTPS request sent to Google Ad Manager to retrieve a Fiverr ad for URLScan.io’s bot during a crawling session. The screenshot highlights that the query string parameter is set to “vpa=auto”.

highlights that the query string parameter is set to `vpa=auto`.

As [another example](#), one can observe a YouTube TrueView subscription campaign ad for the Financial Times serving on [newsmax.com](#) to a [URLScan.io bot](#). The ad buy was handled by Brainlabs Digital, a [certified Google Premier partner](#) media agency.



Screenshot of a Financial Times YouTube TrueView ad serving on [newsmax.com](#) to a [URLScan.io crawler bot](#), where the video player is playing fully muted.

Careful analysis of the HTTP network traffic recorded by [URLScan.io bots](#) when crawling [newsmax.com](#) shows that the Financial Times YouTube TrueView ad was served with volume set to "0".

Full URL	https://s.youtube.com/api/stats/playback?ns=yt&fexp=44748969%2C44765701&el=adunit&cpn=223HVVBc50pQa03s&docid=DL8SmR3oUtg&visitordata=Cgt4a2RDWTLzakZhbw%253D%253D&ver=2&cmt=0.188&fmt=18&rt=0.000&adformat=2_2_1&euri=https%3A%2F%2Fwww.newsmax.com%2F&len=30.000&vtype=gvp&c=web_gvp_ads&cver=h.0.0.0&cbr=Chrome&cbrver=107.0.5304.87&cos=Win32&cosver=537.36&platform=desktop&mos=1&volume=0&delay=28&rtn=10
Protocol	H2
Security	TLS 1.3, , AES_128_GCM
Server	 2a00:1450:400c:c09::71 Brussels, Belgium, ASN15169 (GOOGLE, US),
Reverse DNS	/
Software	/
Resource Hash	e3b0c44298fc1c149afb4c8996fb92427ae41e4649b934ca495991b7852b855

HTTPS requests sent to [youtube.com/api/stats](https://s.youtube.com/api/stats), where “volume=0”, while a Financial Times TrueView ad was served on [newsmax.com](https://www.newsmax.com) to [URLScan.io's bot](https://urlscan.io)

## Publisher environment analysis

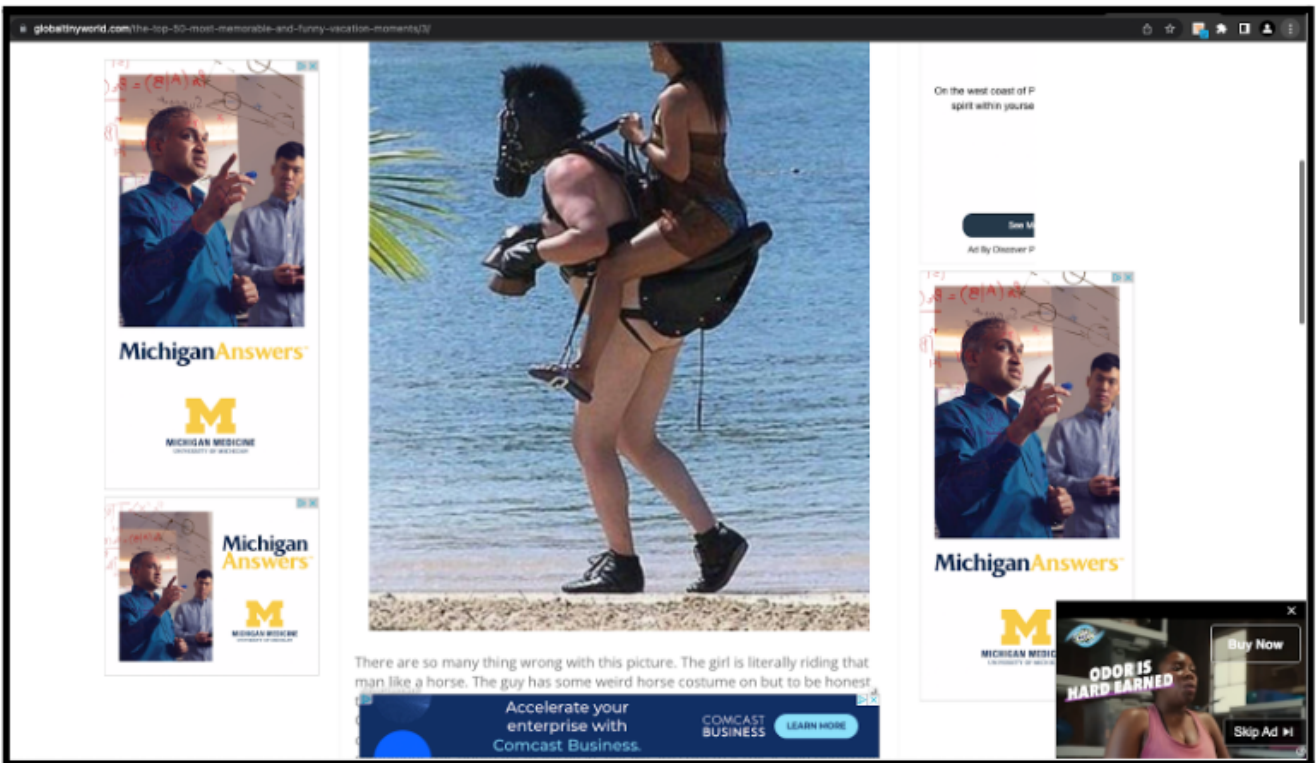
Using data from the aforementioned page archives, as well manual inspection using Google Chrome on desktop or mobile apps on Android and iOS, thousands of publishers were evaluated for a number of parameters, including:

1. Do the video players where the YouTube TrueView ads render auto-play?
2. Do the video players where the YouTube TrueView ads render play muted?
3. Are the video players where the YouTube TrueViews render run in small or out-stream video players, rather than in-stream video players?
4. Is there video content in between consecutive video ads?
5. Are the “Skip” buttons for TrueView ads visible to the consumer?
6. What is the volume and density of YouTube video ads served?
7. Are TrueView in-stream ads being served on games, which Google's documentation defines as not in-stream?

The goal of this analysis was to determine which Google Video Partner publishers were able to serve valid TrueView in-stream placements. For example, some websites and apps, like video streaming sites [viki.com](https://viki.com), [crunchyroll.com](https://crunchyroll.com), [rumble.com](https://rumble.com), or [mtv.com](https://mtv.com) have video viewing experiences

were considered to be consistent with Google's public documentation on requirements for TrueView in-stream ads.

Other websites and apps, though, may display TrueVideo ads that are muted, auto-playing, out-stream, and serving partially or fully non-visible ads. Some of these websites or apps only have gaming content, and no organic video media streaming.



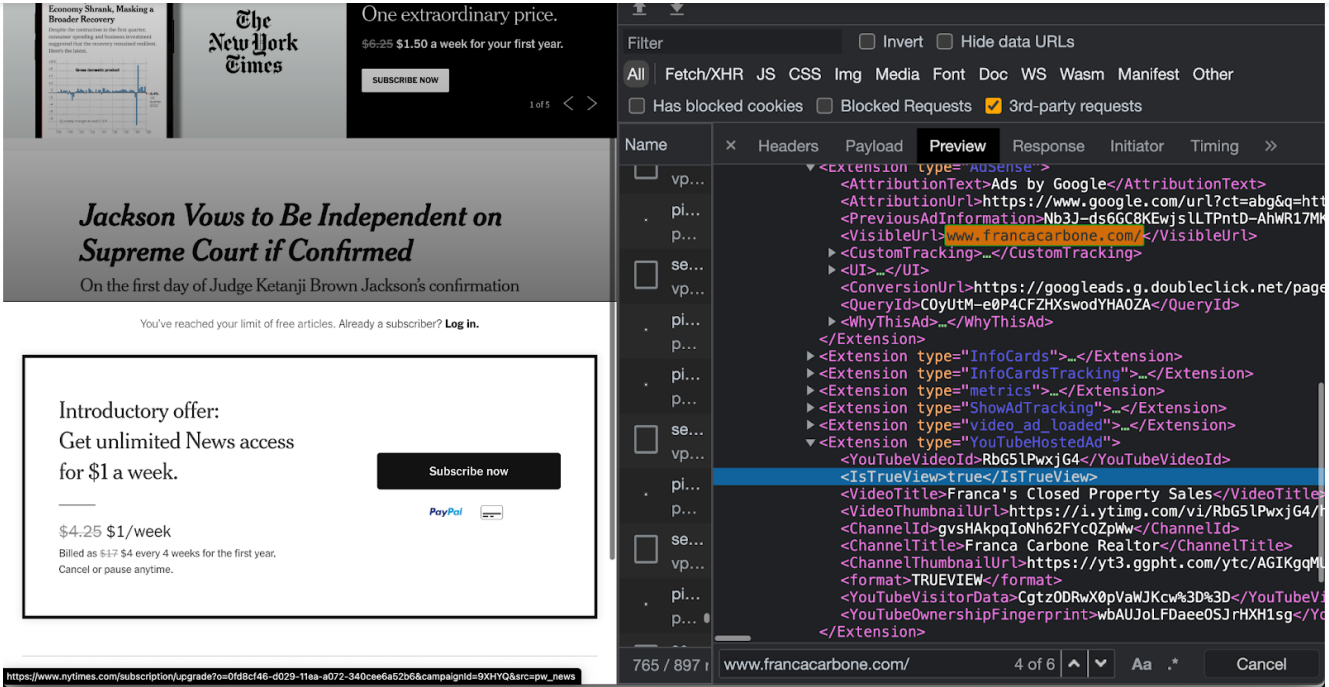
Example of a OxiClean YouTube TrueView ad serving in a muted, auto-playing video player which was considered as not consistent with Google's published requirements for in-stream TrueView placements

For some fringe publisher cases, there was a combination of both valid and invalid TrueView placements. For example, the website of the New York Times (nytimes.com) had both valid TrueView in-stream ad placement as well as invalid placements. In the screenshot below, one can observe an Adobe YouTube TrueView ad serving in a valid in-stream placement on nytimes.com/video.



Example of a valid in-stream, audible TrueView placement on [nytimes.com/video](https://www.nytimes.com/video) section

However, on other pages, a consumer will come to visit the [nytimes.com](https://www.nytimes.com) website to read an article, and will be faced with a subscriber paywall. Even though the consumer cannot actually see the video ad that is serving on [nytimes.com](https://www.nytimes.com), their browser will fetch, serve, and play a YouTube TrueView ad, fully muted. The consumer has no option or choice to skip the TrueView ad, as the entire ad is not accessible to the consumer because of the blocking subscriber wall on [nytimes.com](https://www.nytimes.com).



Screenshot of a YouTube TrueView ad for realtor francacarbone.com serving on “<https://www.nytimes.com/2022/03/21/us/politics/ketanji-brown-jackson-confirmation-hearings.html>”, wherein the consumer is unable to skip or unmute the TrueView ad. This ad placement is not consistent with Google’s published requirements for TrueView in-stream video ads.

Google’s placement reports for TrueView campaigns do not delineate the exact page URL, section, or sub-domain on which a TrueView ad is rendered upon. It’s also not possible for advertisers to only target the legitimate inventory for sites with some combination of valid & invalid in-stream inventory. Given these Google-imposed limitations, this research study classifies publishers like these to be ineligible for TrueView in-stream ads as a whole.

### Placement reports from brands buying YouTube TrueView skippable in-stream video ad campaigns

Several major advertisers, including Fortune 500 brands, provided Adalytics with access to placement reports from their YouTube TrueView campaigns, where the media buyer had not opt-ed out of having YouTube TrueView skippable in-stream ads serve on the Google Video Partner network. These



the Google Video Partner network. These reports included data about the number of views per video ad and how much ad budget was allocated to each publisher or YouTube channel.

The reports were cross referenced against the list of publisher domains and apps that were previously determined to be in-eligible for valid TrueView in-stream placements. The goal of this analysis was to determine how much budget was being allocated to valid 3rd party GVP apps and websites, versus other websites or apps whose video ad serving experience is not consistent with the TrueView in-stream standard.

### **Surveying marketers and advertisers to assess expectations**

Upon identifying a large number of publisher environments that did not appear to be consistent with the requirements for running YouTube TrueView ads on the Google Video Partner network, Adalytics surveyed a convenience sample of marketers, media buyers, and other digital advertising professionals, to assess their expectations with regards to YouTube TrueView ads.

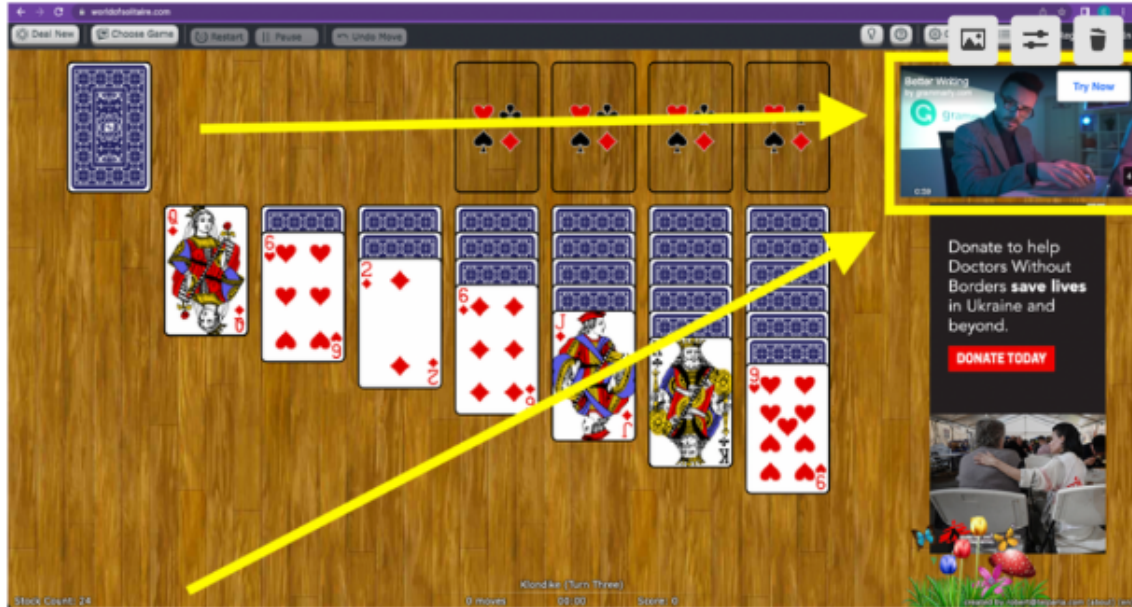
This sample included buyers from multiple countries, buyers from both large media agency holding companies and smaller independent agencies, and media professionals from Fortune 500 brands.

The survey asked questions concerning what marketers expect when buying YouTube TrueView ads. Furthermore, the survey also showed specific YouTube TrueView ad placements on Google Video Partner 3rd party environments, and asked the marketers to comment on whether or not they would consider a given placement to be a valid environment for YouTube TrueView ads.

Sound: muted by default

Video: **auto-plays** without user input

TrueView ad: **Grammarly.com** video ad in the top right hand corner.



A Yes, this is valid for YouTube *in-stream* TrueView

B No, this is NOT valid for YouTube *in-stream* TrueView

[Add choice](#)

Screenshot of a question from a Typeform survey Adalytics, illustrating an example question that was posed to media buyers about YouTube TrueView ads

### Results

In some YouTube TrueView in-stream campaigns, 50-90% of a brand's YouTube ad budget is spent on third party GVP publisher sites and apps

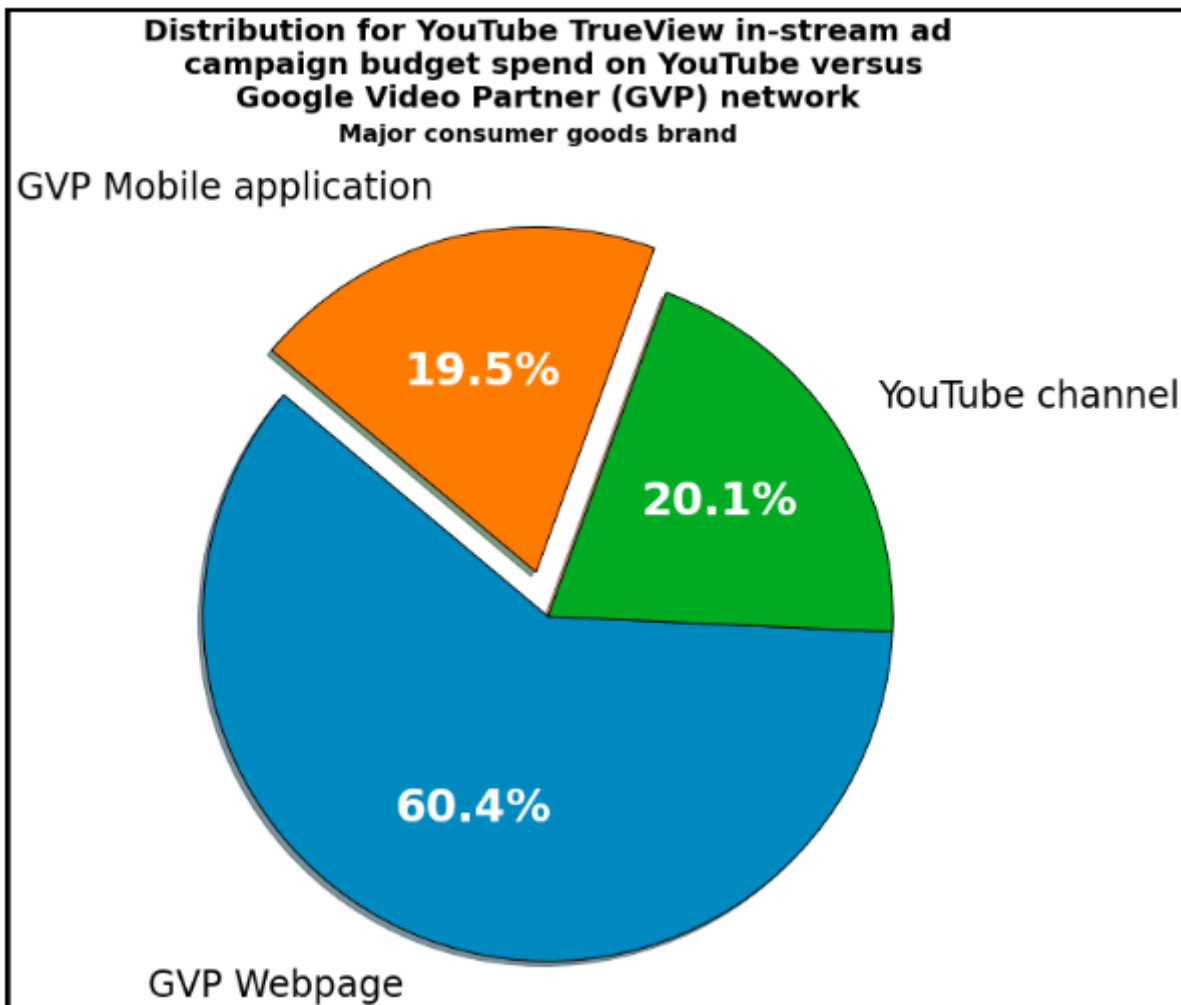
As discussed in the Methodology section, Adalytics was provided access to YouTube TrueView skippable in-stream ad buy placement reports and data from multiple large brands, including Fortune 500 advertisers.

Each ad campaign placement report was analyzed to see how much budget was spent serving ads on YouTube channels (e.g., the YouTube.com website



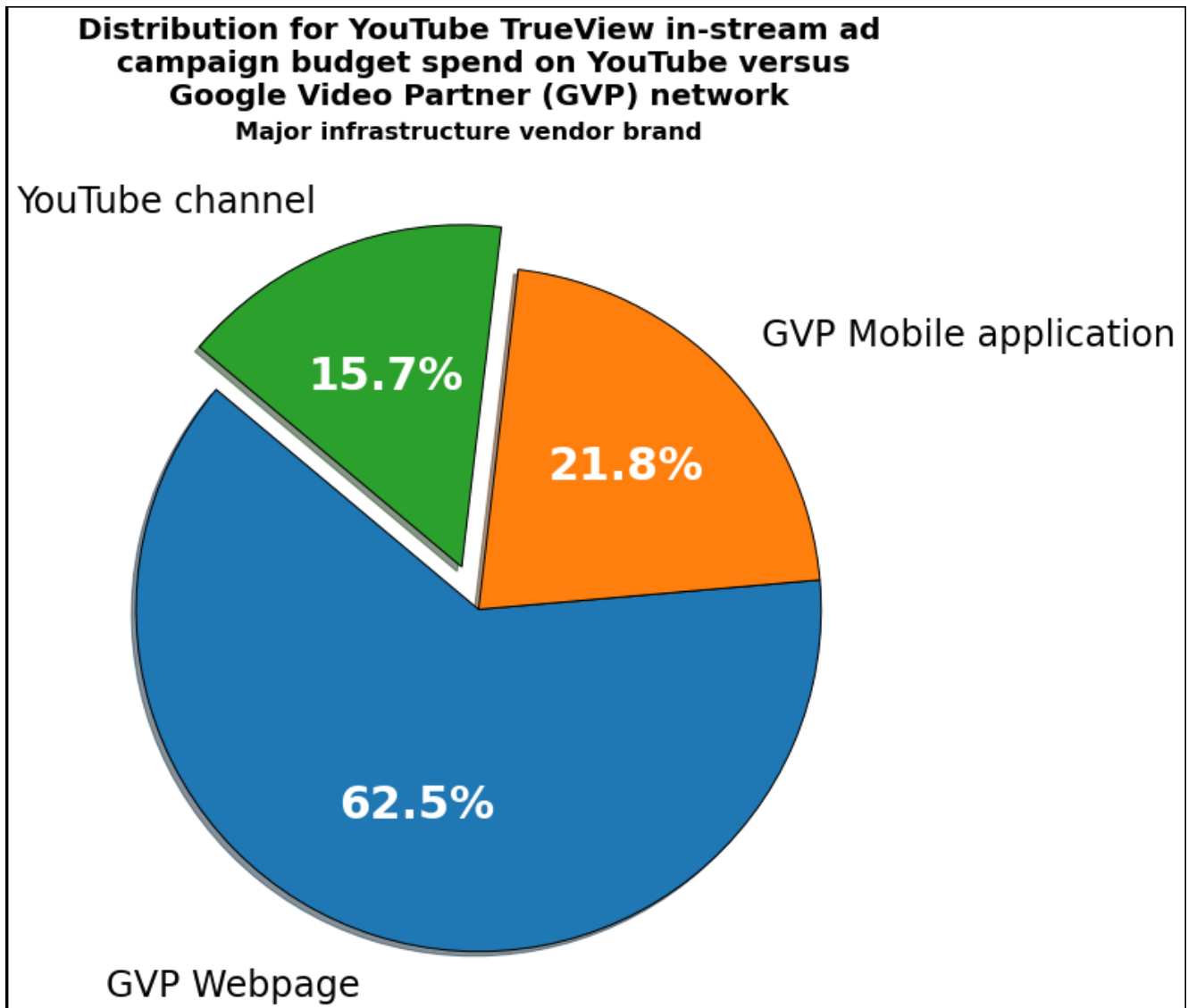
For one Fortune 500 brand which spent tens of thousands of dollars on a particular TrueView skippable in-stream campaign, almost 90% of the campaign budget went to Google Video Partner (GVP) mobile apps and websites. Only ~10% of the TrueView campaign budget was delivered against YouTube channels.

In another instance, a major consumer goods brand spent over \$75,000 on a TrueView skippable in-stream campaign. 20% of the brand’s TrueView campaign budget was delivered against YouTube channels, while 80% was delivered against third party apps and websites such as “investing.com”, “fandomwire.com”, or Candy Crush Saga on Android. There were over 8,000 unique websites and over 5,000 unique mobile applications in the placement report.

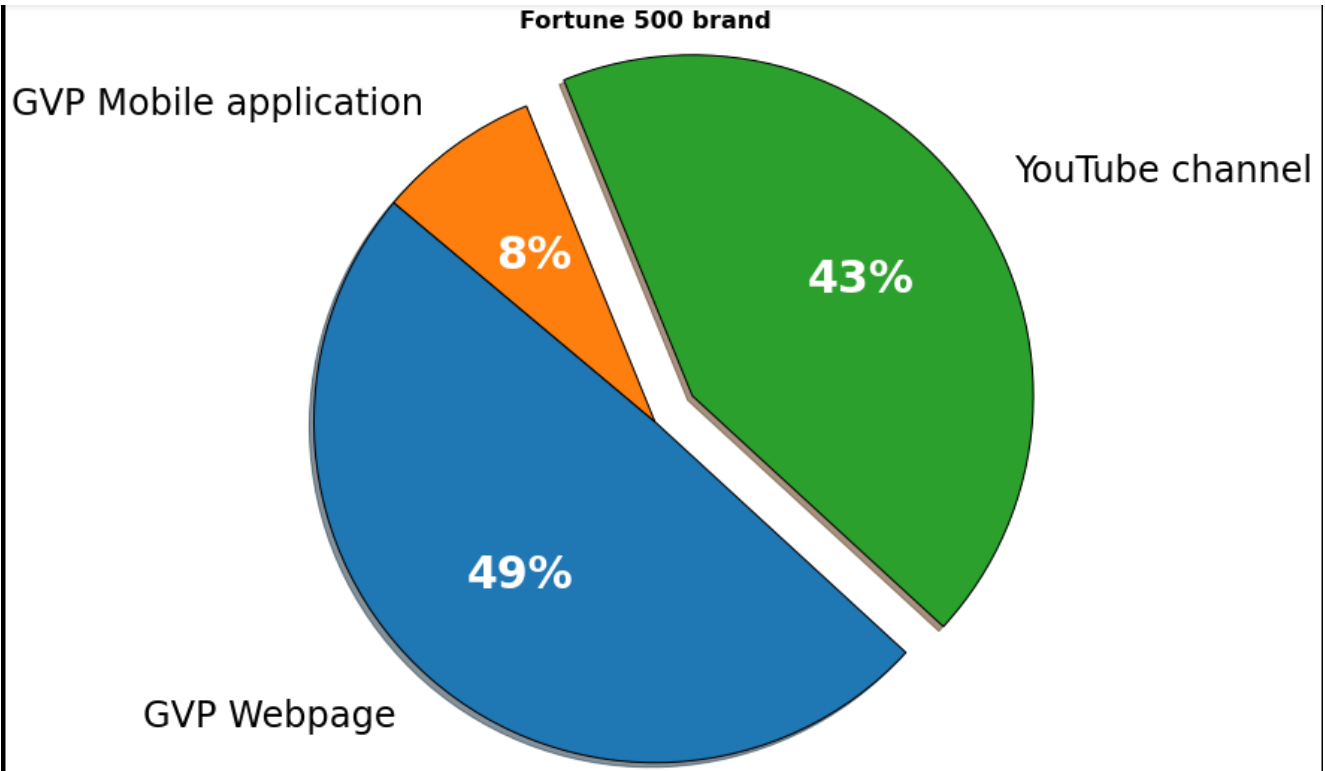




quarter period. Approximately 15% of the brand's TrueView budget was spent on YouTube Channels, while the remaining 85% was allocated to GVP third party mobile applications and websites, such as "poki.com" or the "Happy Color: Coloring Book" Android mobile app. There were over 10,000 unique websites and over 8,000 unique mobile apps in this placement report.



Another Fortune 500 brand had approximately 57% of their TrueView in-stream ad campaign budget delivered against Google Video Partner mobile applications and web pages.



### In some TrueView skippable in-stream campaigns, 42-75% of a brand's TrueView ad budget is spent on invalid GVP sites and apps

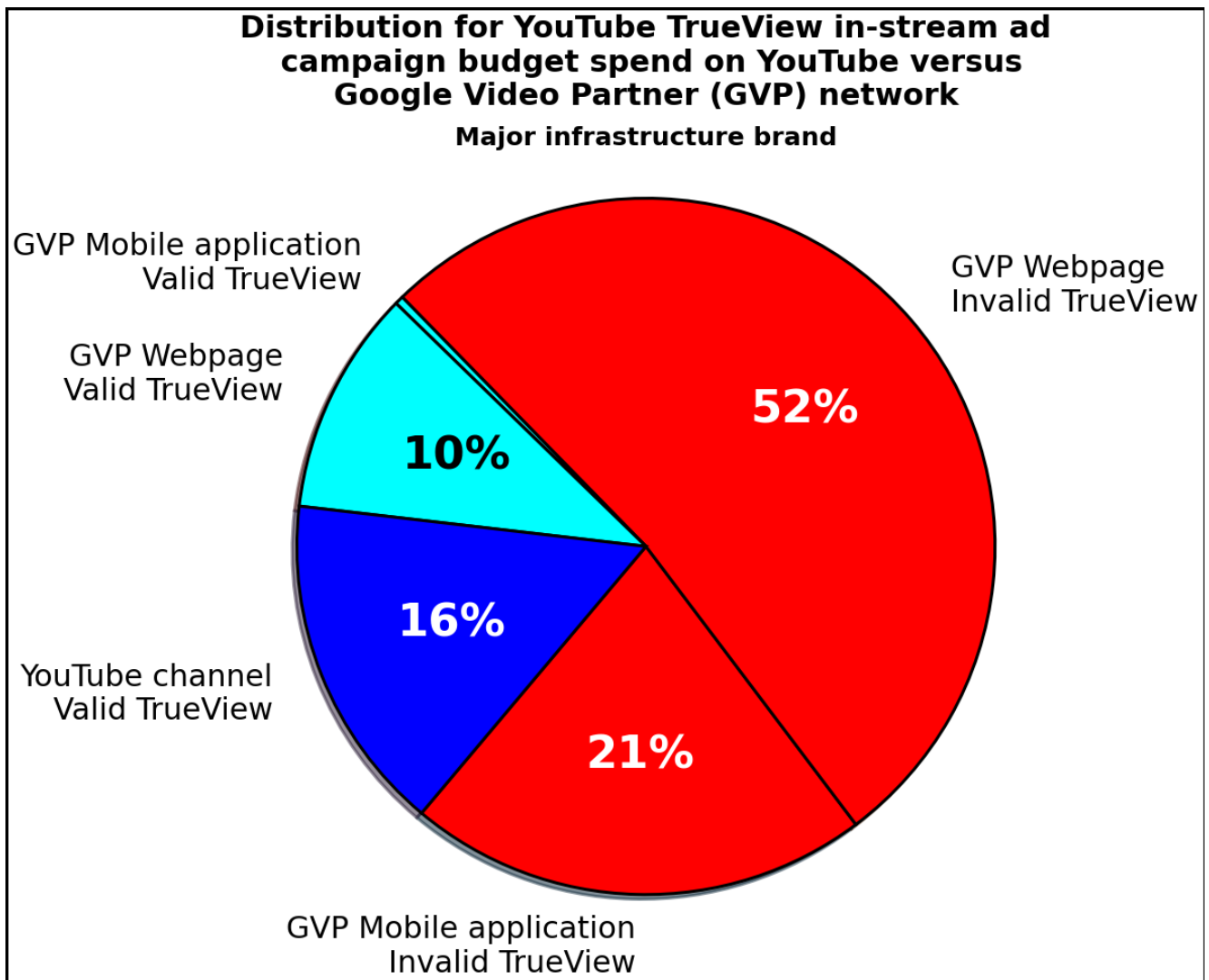
The previous section detailed how much of some TrueView skippable in-stream video ad campaigns were served against mobile apps and websites in the Google Video Partner network. This section goes a step further, and summarizes how much of that spend on GVP sites and apps was inconsistent with Google's policies and requirements for TrueView or in-stream video ads. The detailed sub-analyses that went into this summary are detailed in follow-on sections.

As described earlier, Google's policies state several requirements for TrueView or skippable in-stream ads:

- video ad placements must be audible by default
- scroll-to-play ads are not permitted for TrueView
- Only serve in-stream video ads to valid in-stream placements
  - valid in-stream placements exclude "out-stream" or "non-in-stream" video slots, such as:

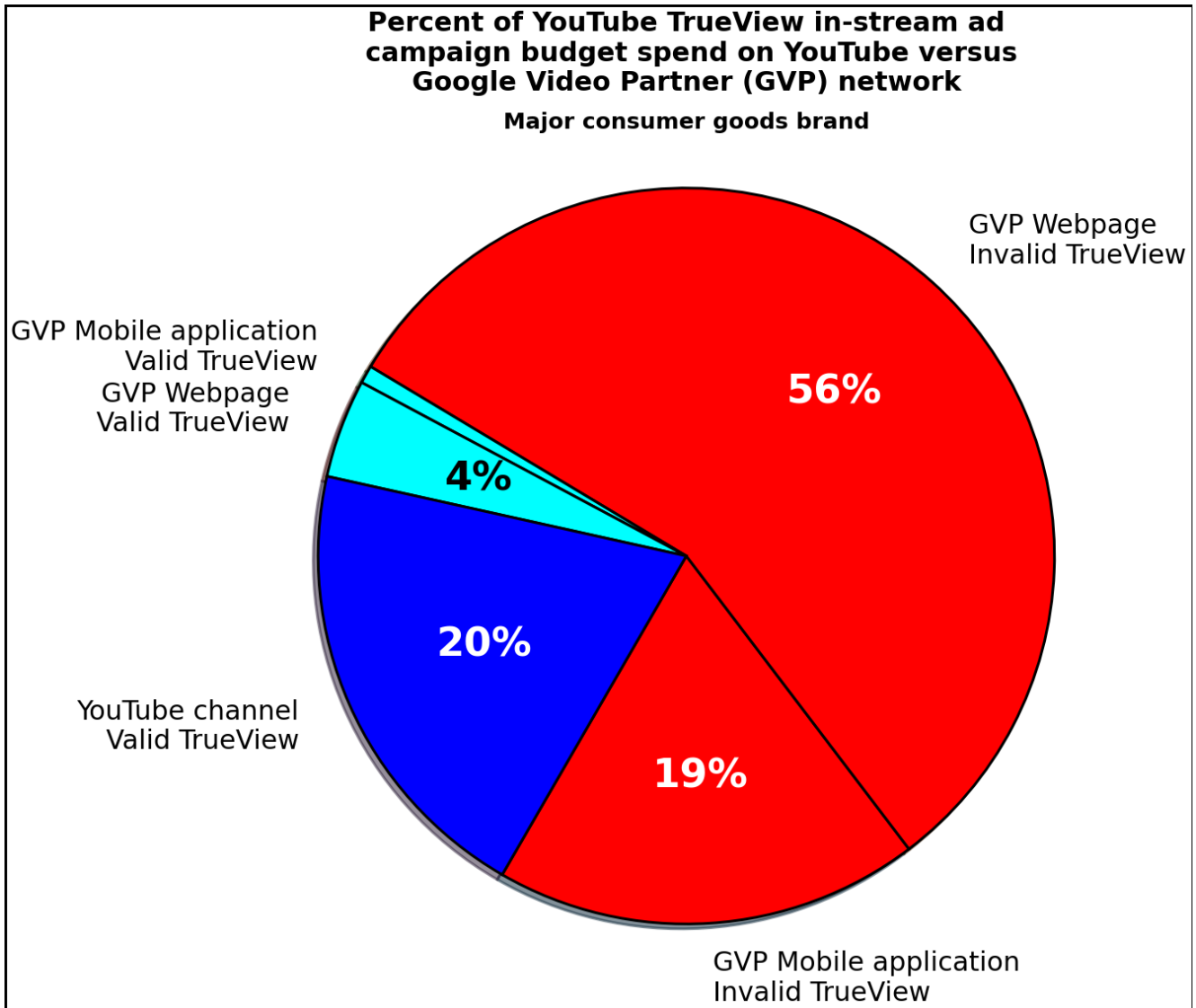
- games, in-article, or in-feed placements

For one major infrastructure brand approximately 73% of their TrueView skippable in-stream budget was spent on Google Video Partner sites or apps whose ad delivery does not appear to be consistent with the TrueView or in-stream requirements. For example, this brand’s TrueView ads were serving in muted out-stream video players or on games for children with no video content. The brand had hundreds of thousands of TrueView in-stream video ads served into muted, out-stream video slots on mapquest.com, newsmax.com, or factinate.com. The brand also had tens of thousands of TrueView in-stream ads served on the “[My Talking Tom 2](#)”, a gaming app “targeted towards kids 4-8” years old.

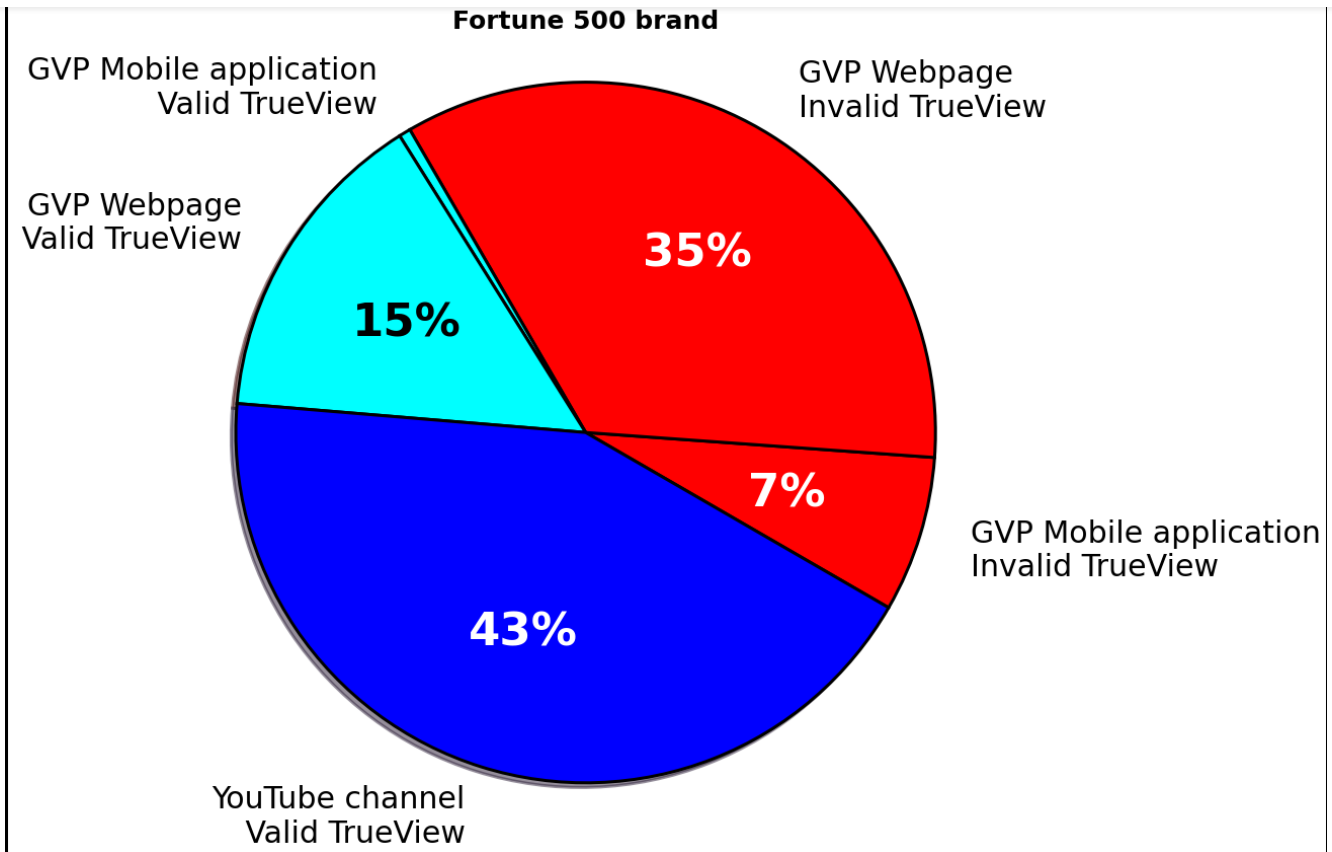


A major consumer goods brand had 75% of their TrueView budget delivered

non-in-stream video players, such as [accuweather.com](#) or [heraldweekly.com](#). 19% of their TrueView skippable in-stream ad budget delivered against ineligible mobile apps which are not video streaming apps, such as the “Words with Friends Word” mobile app.



A Fortune 500 brand had approximately 57% of their total TrueView in-stream ad budget served on GVP sites and apps. 35% of their total TrueView budget was spent against websites which served TrueView ads in muted or non-in-stream video players, such as [citationmachine.net](#). 8% of their TrueView skippable in-stream ad budget delivered against ineligible mobile apps which are not video streaming apps.



## Analyzing Google Video Partner (GVP) websites

TrueView ads are served on thousands of publishers with muted, out-stream, below-the-fold, or auto-playing video players

As discussed previously, Google's [online public documentation](#) states that TrueView in-stream ads "must be audible by default", that "scroll-to-play ads are not permitted for TrueView", and these ads should "only serve in-stream video ads to valid in-stream placements".

Furthermore, Google's [online documentation](#) states that mis-declaring out-stream video ad slots as in-stream is a form of "invalid traffic."

As mentioned in the Methodology of the section report, thousands of Google Video Partner publishers were analyzed to determine whether the video ad serving experience on these sites and apps is consistent with the TrueView in-stream ad format. This analysis was partially based on millions of web crawls from sources such as [HTTP Archive](#), [DeepSee.io](#), and [URLScan.io](#). This methodology was used to assemble an exclusion list of publishers who

The analysis was predicted on a combination of different technical indicators and signals, such as:

- observed recordings of HTTPS requests sent to “securepubads.g.doubleclick.net/gampad/ads” (Google Ad Manager), wherein the vpa parameter was to set “click” or the “vpmute” parameter was set to “1”
- HTTPS requests where the referer request header is “imasdk.googleapis.com” (the Google IMA SDK video player), that were sent to the endpoint “youtube.com/api/stats”, with the query string parameter “volume” set to “0”
- Multiple IMA SDK video players rendering TrueView ads simultaneously
- Declaration of video inventory as out-stream by publishers, or muted, auto-played

The research analysis revealed instances of TrueView ads being delivered on websites and apps whose video serving experience was completely consistent with the TrueView format. For example, there were TrueView ads delivered against websites such as the following:

- viki.com
- crunchyroll.com
- rumble.com
- dingit.tv
- mtv.com
- videos.aarp.org

Each of these aforementioned sites displayed video ads in a default audible state, and the ads were served in-stream to an actual organic video

However, the output of the research analysis highlighted many instances of TrueView ads being served on both many well known sites as well as many fringe publishers, wherein the video ad serving appeared to be inconsistent with Google's written policies on the TrueView format.

Listed below is a sample of well known publishers which were observed to be serving auto-playing, muted video TrueView ads:

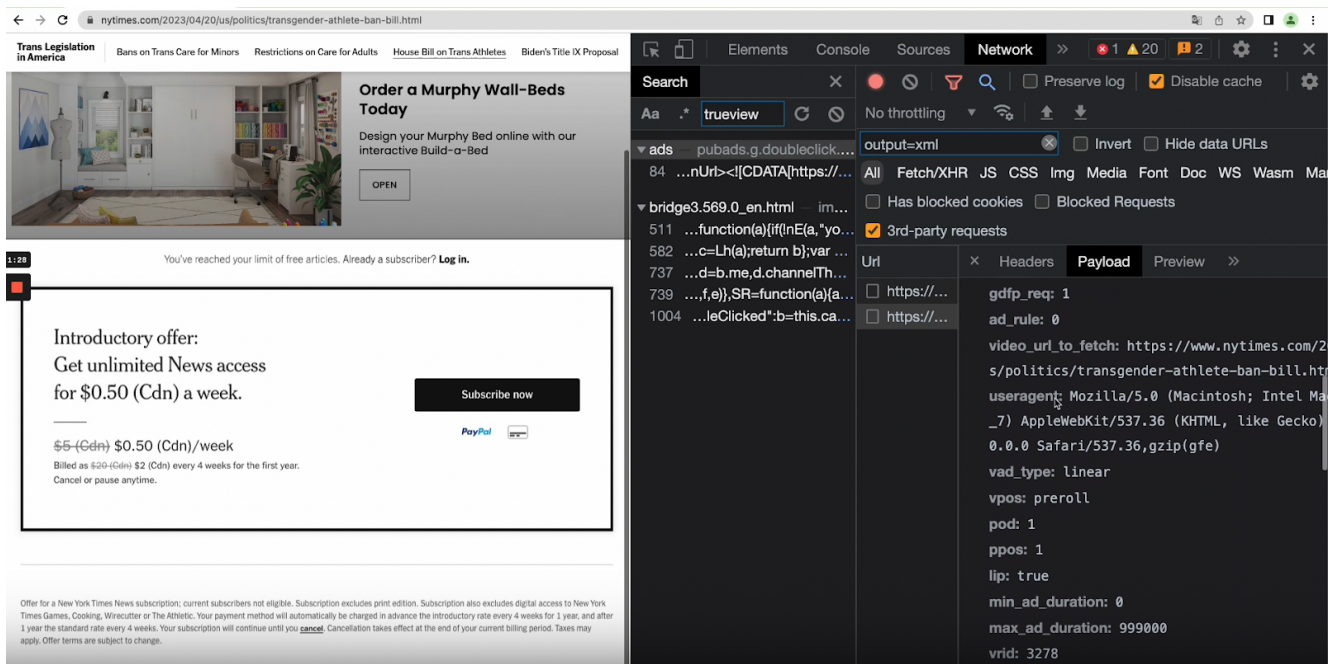
- [nytimes.com](https://www.nytimes.com)
- [accuweather.com](https://www.accuweather.com)
- [weather.com](https://www.weather.com)
- [huffpost.com](https://www.huffpost.com)
- [usatoday.com](https://www.usatoday.com)
- [reuters.com](https://www.reuters.com)
- [wired.com](https://www.wired.com)
- [rbc.ru](https://www.rbc.ru)
- [investing.com](https://www.investing.com)
- [mashable.com](https://www.mashable.com)
- [apnews.com](https://www.apnews.com)
- [fastcompany.com](https://www.fastcompany.com)
- [gizmodo.com](https://www.gizmodo.com)
- [ndtv.com](https://www.ndtv.com)
- [chron.com](https://www.chron.com)
- [mapquest.com](https://www.mapquest.com)



- [venturebeat.com](https://venturebeat.com)
- [nydailynews.com](https://nydailynews.com)
- [lifehacker.com](https://lifehacker.com)
- [irctc.co.in](https://irctc.co.in)

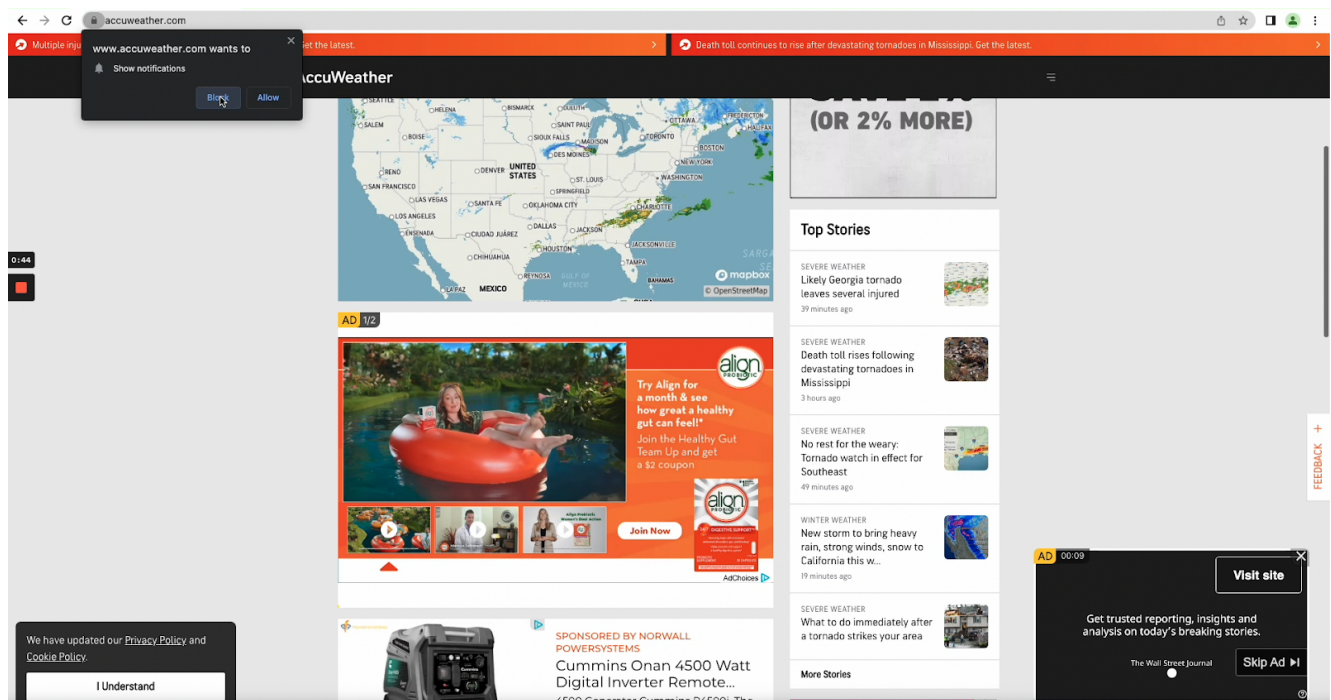
For example, a TrueView skippable in-stream ad for Discovery+ (a streaming service owned by Warner Bros. Discovery), **was served on** the NYTimes article “ <https://www.nytimes.com/2022/03/21/us/politics/ketanji-brown-jackson-confirmation-hearings.html>”, on March 14th, 2022. The Discovery+ TrueView video ad was completely non-viewable, muted, and auto-playing.

More recently, TrueView skippable in-stream ads for Fuso El Salvador and for Avancon (an international logistics firm) was served on the nytimes.com article “<https://www.nytimes.com/2023/04/20/us/politics/transgender-athlete-ban-bill.html>”. In the **screen recording below**, one can observe that the consumer cannot see any of the video ads, as they are completely blocked by a subscriber paywall. The ads run from start to completion, in a completely muted, non-visible state.



As another example, a TrueView ad for Samsung **was served on** the Reuters article “<https://www.reuters.com/business/retail-consumer/britains-tesco-offers-salary-advance-cash-strapped-staff-2022-11-18/>”. The video ad was auto-playing, more than 50% obscured, and muted.

As a third example, one can observe TrueView skippable in-stream ads for the Wall Street Journal (WSJ), which was trying to attract new subscribers, serving on [accuweather.com](#). In the [screen recording](#) below, the WSJ TrueView ad is served in an out-stream, muted, auto-playing video player. Furthermore, the WSJ TrueView ad is running while a second video player on the [accuweather](#) page is serving a different video ad for Procter & Gamble’s “Align Probiotic” product.



[Video recording](#) of a WSJ YouTube TrueView ad serving in a muted, out-stream, auto-playing video player on [accuweather.com](#), while a second video ad for Procter & Gamble is being show on the page

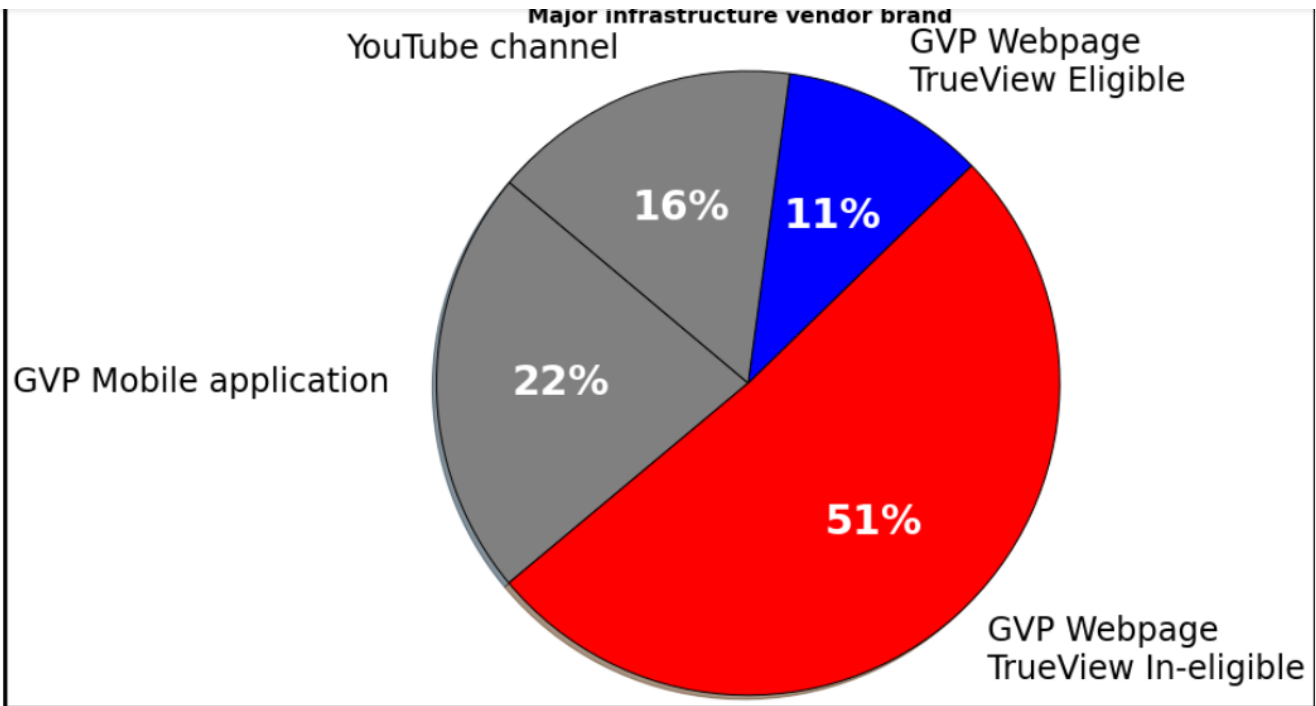
As a fourth example, a YouTube TrueView ad for a German car services firm Autohaus NIX GmbH **was served on** October 30th, 2022 on the landing page of the Indian Railway’s online ticket purchase portal for the train tickets -

The full exclusion list of Google Video Partner websites which were identified as serving TrueView ads but appeared not to be serving the ads in a valid, audible, in-stream video player included over forty thousand publishers. Some of these websites had other potential “brand suitability” concerns - for examples, some of the websites were:

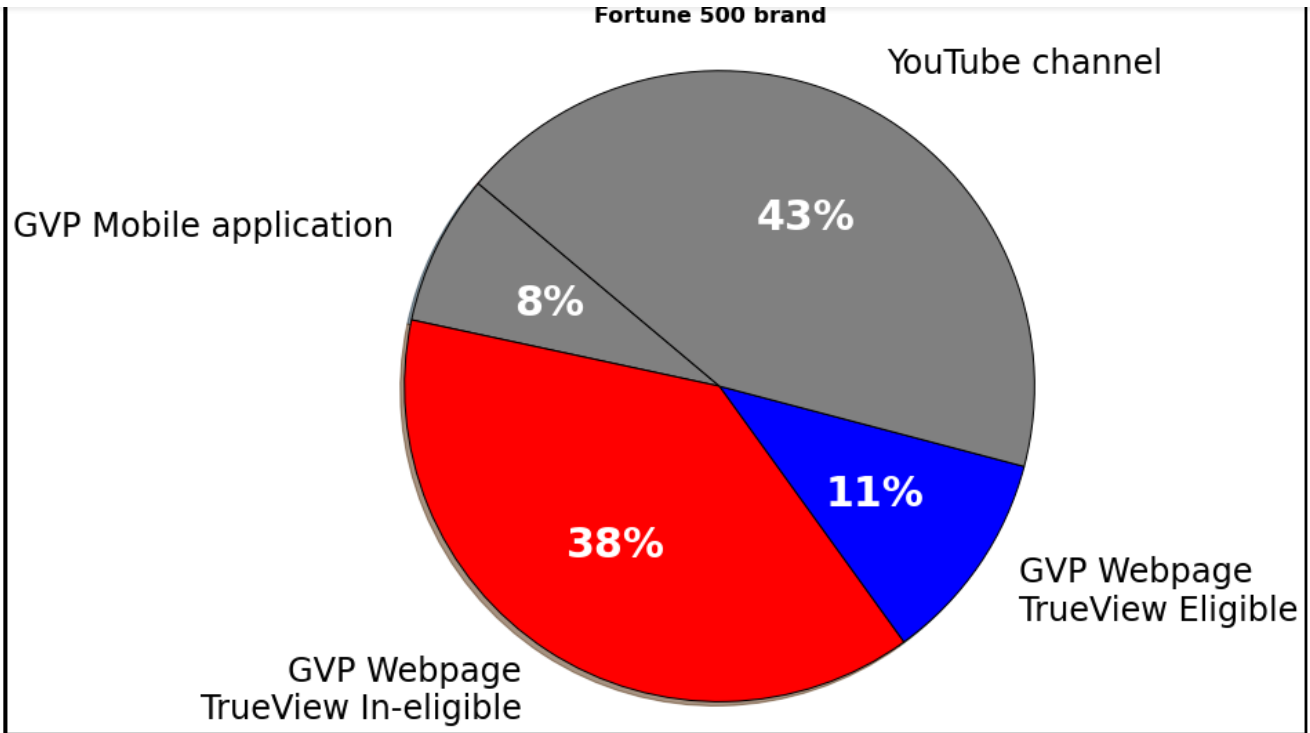
- observed as having tens of thousands of copyright violations,
- ‘made-for-advertising’ sites with no organic audiences,
- dis-information sites which are Registered Foreign agents
- may be targeted towards young children,
- or may potentially be operated by entities in countries that are under United States sanctions.

**When cross-referencing TrueView ad campaign placement reports from advertisers, approximately 80.7% of the subset of their budget that went to Google Video Partner websites, was found to be delivering against sites which were identified as serving video ads in muted, auto-playing, obscured, or out-stream video slots.**

For example, for the major infrastructure brand mentioned in the previous section, 62.5% of their TrueView in-stream ad campaign budget was delivered against GVP websites (as opposed to GVP mobile apps and YouTube.com). Of that 62.5% of their total budget, 82.5% was delivered against Google Video Partner websites which were playing TrueView ads in muted, out-stream, auto-playing, or hidden video slots. This means that 51% of their total TrueView in-stream ad budget was delivered against GVP websites whose video ad rendering experience was not consistent with the TrueView in-stream format.



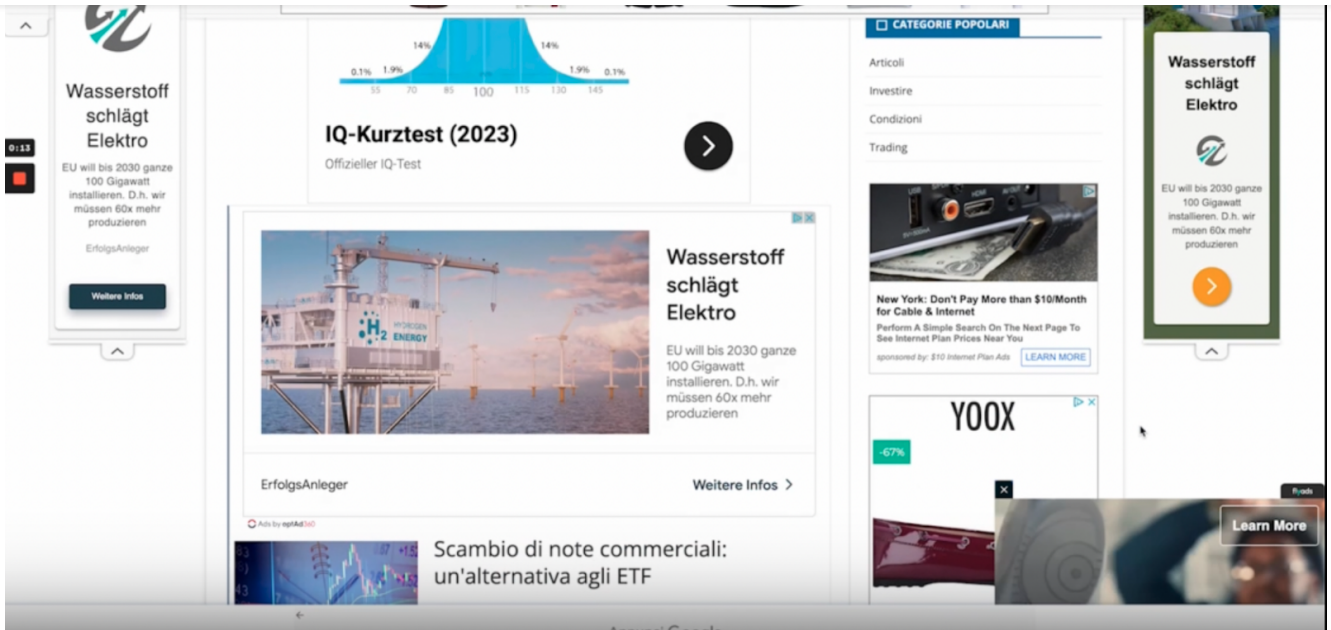
As another example, for the Fortune 500 brand mentioned in the previous section, 49% of their TrueView in-stream ad campaign budget was delivered against GVP websites (as opposed to GVP mobile apps and YouTube.com). Of that 49% of their total budget, 77.7% was delivered against Google Video Partner websites which were playing TrueView ads in muted, out-stream, auto-playing, or hidden video slots. This means that 38% of their total TrueView in-stream ad budget was delivered against GVP websites whose video ad rendering experience was not consistent with the TrueView in-stream format.



**Some YouTube TrueView ads are served in partially obscured environments, preventing the consumer from being able to skip the ads**

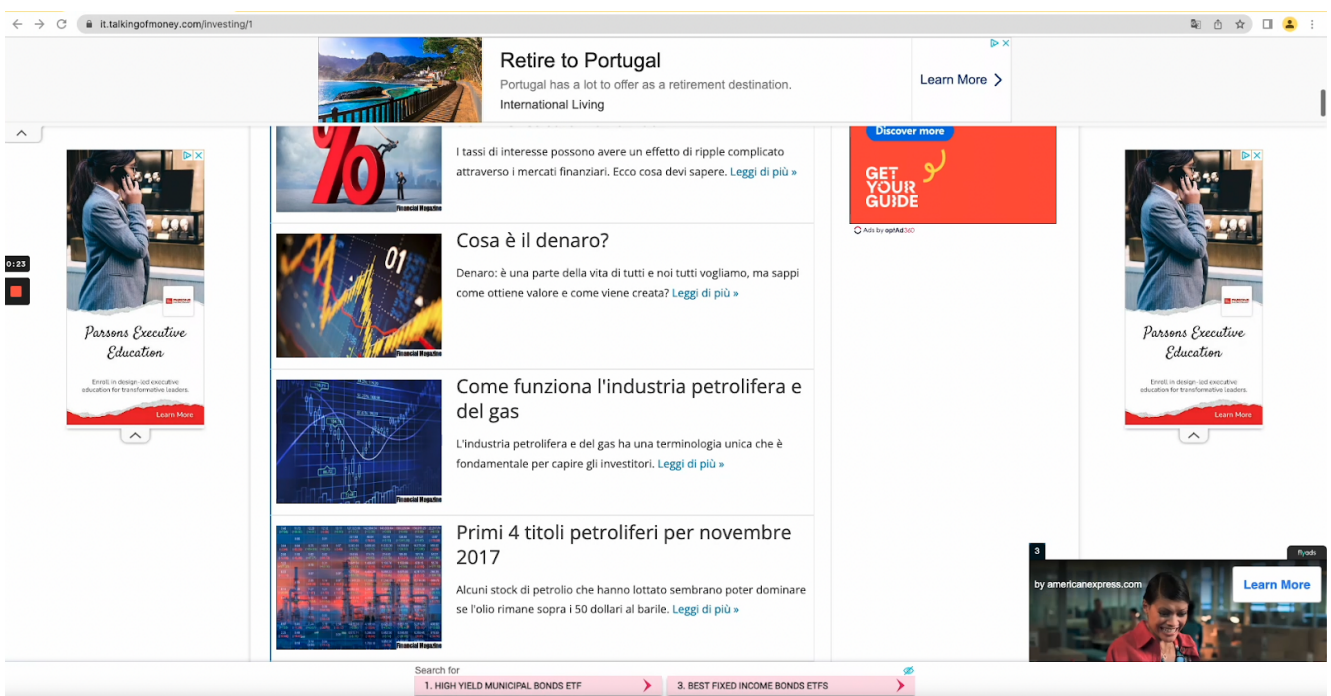
In certain Google Video Partner environments, TrueView skippable in-stream ads were observed being served in a manner that made it impossible for the viewer to click the TrueView “skip” button.

For example, in the [video recording below](#), one can observe YouTube TrueView skippable in-stream ads being served for Adobe and CanadalsTheSolution.com, wherein the TrueView ads muted and auto-playing, and the “Skip” button for the ad is hidden and in-accessible because it is covered by another (banner display) ad. The CanadalsTheSolution.com ad is distributed by DDB Canada (part of Omnicom group) on behalf of Canadian Energy Centre Ltd.



Screen recording of an Adobe TrueView ad and a Canadian Energy Centre Ltd ad running with the "Skip" button obscured.

As another example, one can observe TrueView ads for American Express being served, where the (muted, auto-playing, out-stream) TrueView ad is covered by another banner display ad that prevents the consumer from being able to click "skip" on American Express's ad.



The inability to skip TrueView ads on certain GVP publisher websites may result in artificially inflated video completion counts, and thus, billable events for brands and advertisers.

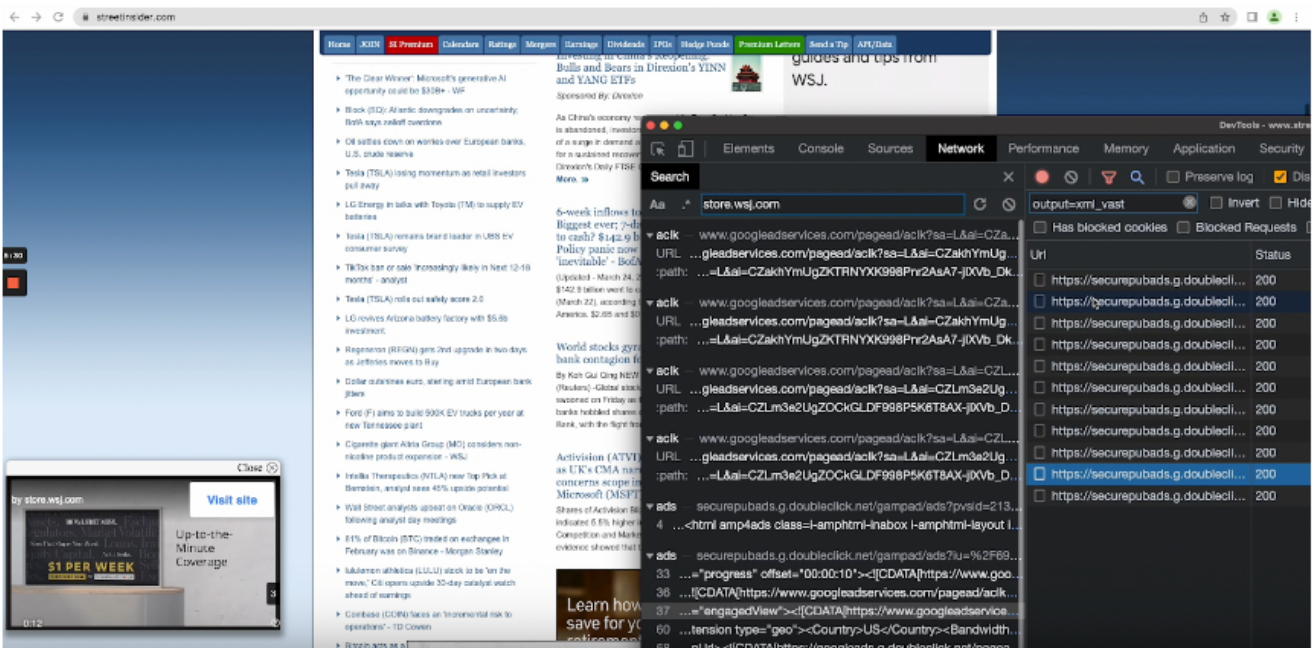
## Some consumers are shown the exact same TrueView ad 20-42x times in a few minutes

On some GVP publisher environments, a consumer will be shown the exact same TrueView ad over and over many times.

For example, [in the screen recording below](#), one can observe how The Wall Street Journal (WSJ) is running an ad campaign to attract new subscribers to its newspaper. The tracking tags in the ad creative suggest this ad campaign is called “wsjusspring22”.

The WSJ’s TrueView ads are being served in a muted, auto-playing, out-stream video player.

The consumer in the video recording is being served twenty (20) TrueView ads for this WSJ campaign in about eight minutes.

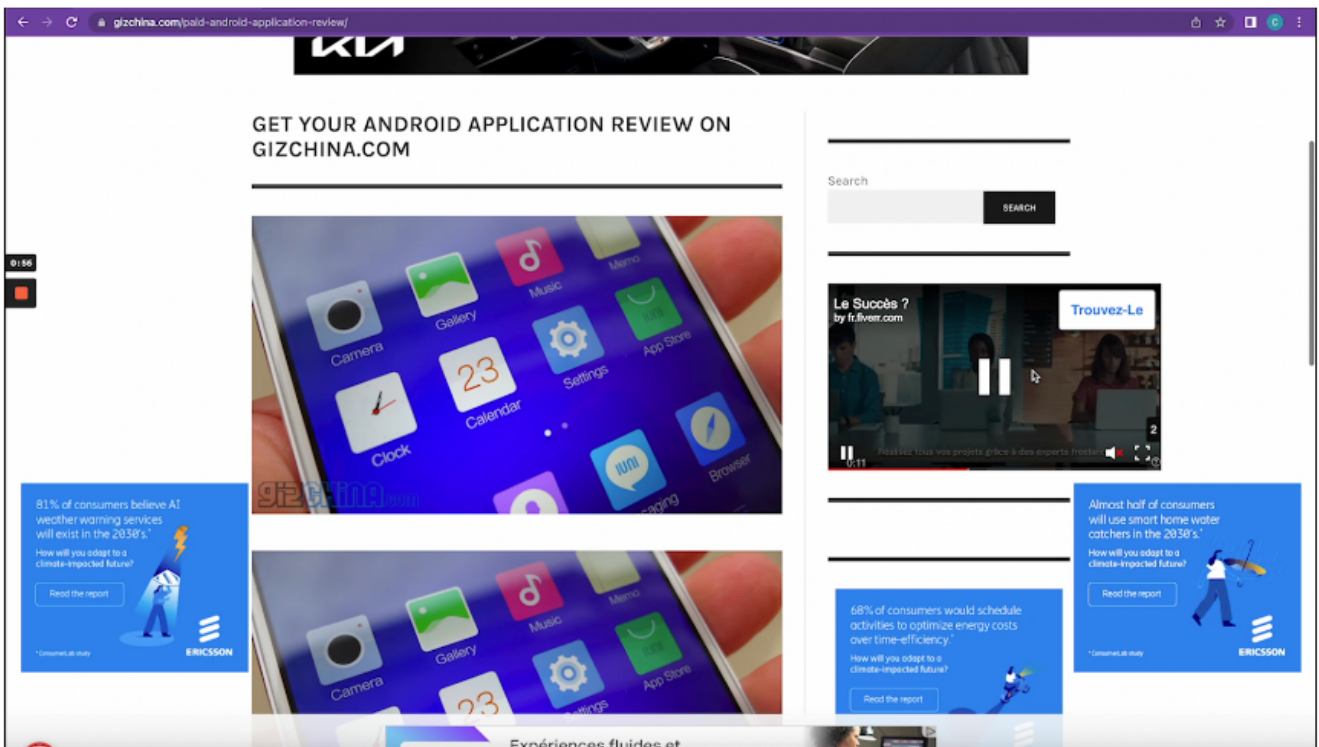


video player.

### On some GVP sites, the same TrueView ad is served over and over even when the consumer clicks 'Skip' repeatedly

On some GVP publishers, a consumer can repeatedly try to click the "Skip" button on a video ad, only for the exact same TrueView ad to be served over and over and over.

For example, [in the video recording below](#), a consumer clicks the "skip" button as fast they are allowed to, and yet, the exact same TrueView ad for Fiverr is served back to back, with no organic media content show to them in the (out-stream, muted, auto-playing) video player.



Screen recording of multiple consecutive Fiverr TrueView skippable in-stream ads being served, despite the consumer repeatedly clicking the "Skip" button.

On some GVP sites, the same TrueView ad is being served in multiple video



Google's [public documentation](#) states that "no more than one video ad placement may play in view at any given time."

However, despite this policy, on some GVP publishers, multiple TrueView ads were observed being served at the exact same time in different video slots. In some cases, it was the same brands' ads being rendered in secondary video players.

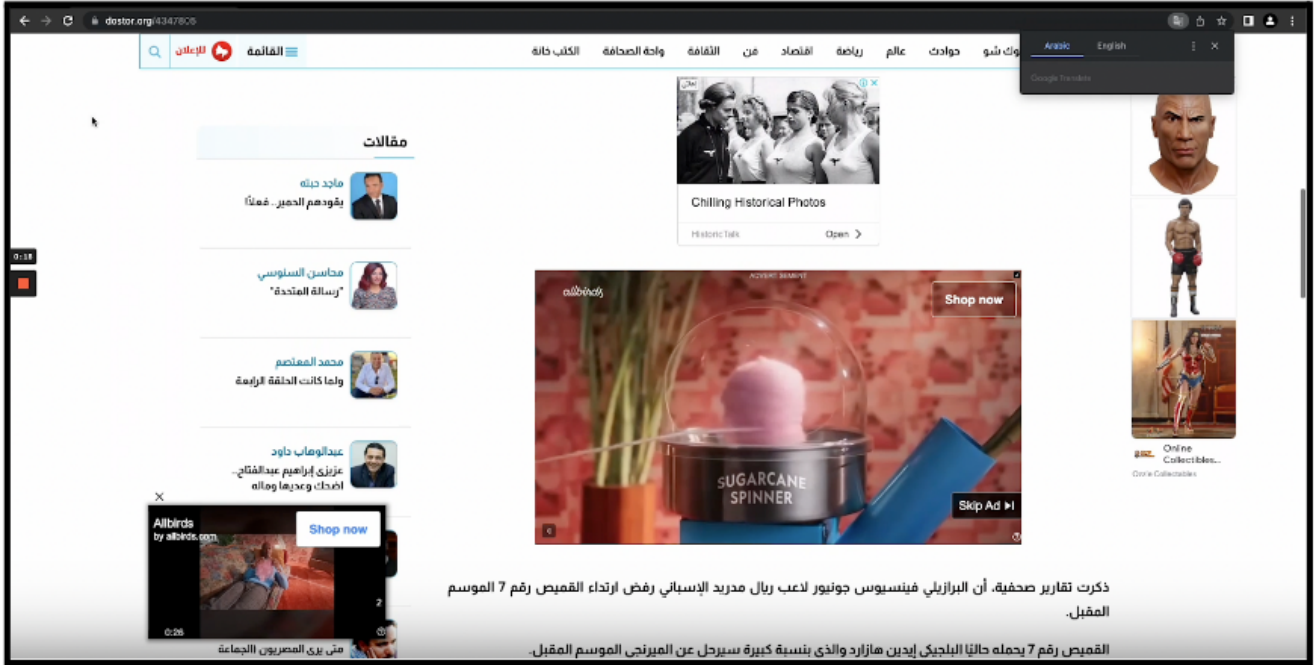
For example, [in the video recording below](#), one can observe multiple TrueView ads being served for Grammarly and Virgin Voyages cruise lines simultaneously. Both pairs of TrueView ads are being served in muted, auto-playing video players.



[Screen recording](#) of two YouTube TrueView ads for Grammarly and Virgin Voyages cruise lines running side by side at the same time.

For example, in the video recording below, one can observe multiple TrueView skippable in-stream ads being served for Grammarly and Virgin Voyages cruise lines simultaneously. Both pairs of TrueView ads are being served in muted, auto-playing video players.

ads are being served side-by-side in different muted, auto-playing, out-stream video players.



**Video recording** of multiple Allbirds TrueView skippable in-stream ads being served on different video players in the same time

In the screenshot below, one can observe two muted, auto-playing video players running and serving the same TrueView ad for expedia.com on "etypen-com.ngontinh24.com".



Don't pay more by expedia.com [Book now](#)

Price Drop Protection

Add now →

0:07

Available for a fee on select flights. Refund will be the difference if the price of your flight on Expedia drops. Terms apply. See site for details.

Skip Ad ▶

Advertisement X

Don't pay more by expedia.com [Book now](#)

Price Drop Protection

Add now →

0:08

Skip Ad ▶

Understanding Kerberoasting attacks and how to prevent them [View](#)

The surprising ancient origins of Passover [View](#)

Pairs well with charoset: Ten Israeli wines for your Passover table [View](#)

How To Make The Perfect Passover Seder Meal For Two [View](#)

## Some TrueView ads are served on potentially copyright infringing or piracy publishers

“[Google regularly](#) receives requests to delist content from Search results that may infringe on copyright.” The Google Transparency Report” provides data on such requests to delist links from Search.”

According to [Google’s online documentation](#),

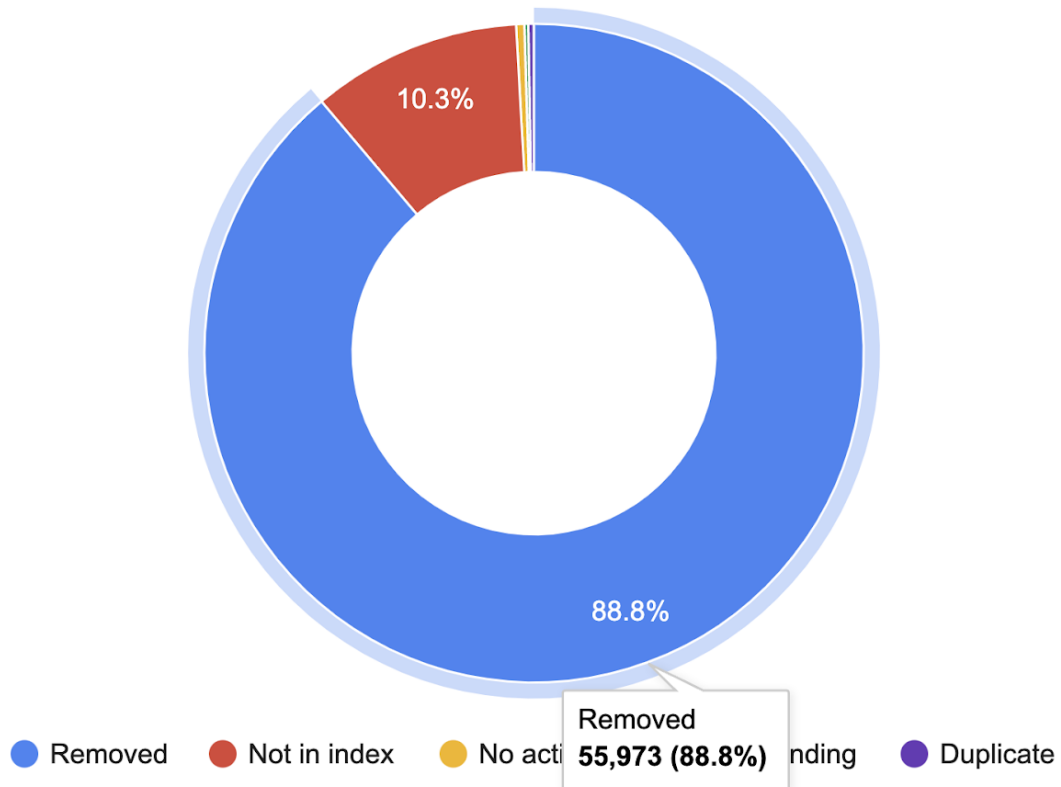
“It is our policy to respond to clear and specific notices of alleged copyright infringement. The form of notice we specify in our web form is consistent with the Digital Millennium Copyright Act (DMCA) and provides a simple and efficient mechanism for copyright owners from countries/regions around the world. To initiate the process to delist content from Search results, a copyright owner who believes a URL points to infringing content sends us a takedown notice for that allegedly infringing material. When we receive a valid takedown notice, our teams carefully review it for completeness and

The significance of the above documentation is that it shows Google has “teams carefully review” copyright infringement allegations, and publicizes which websites or domains have had a page that was removed from Google Search results because Google’s teams considered the given page to be infringing on a rightful owner’s copyright owner rights.

For example, one can observe that the [Google Transparency Report has records](#) of Google receiving over 15,000 individual DMCA takedown requests for delisting from search for the website “freewebnovel.com”. These 15,000 requests covered 63,002 different URLs on freewebnovel.com. In the screenshot below, one can note that of the 63,002 URLs requested to be removed on copyright violations grounds, 55,973 (88%) were reviewed by Google’s teams and then removed.

This domain had 63,002 URLs over 15,244 individual requests requested for delisting from our Search results.

### Specified domain outcomes



This chart shows the outcomes of each URL that has been submitted for this domain.

Screenshot of [Google Transparency Report](#) for “freewebnovel.com”, showing that Google’s team delisted 55,973 URLs from that website pursuant to copyright violation requests. A separate part of [Google’s documentation](#) states that “Google ads may not be displayed on websites with content protected by copyright law.”

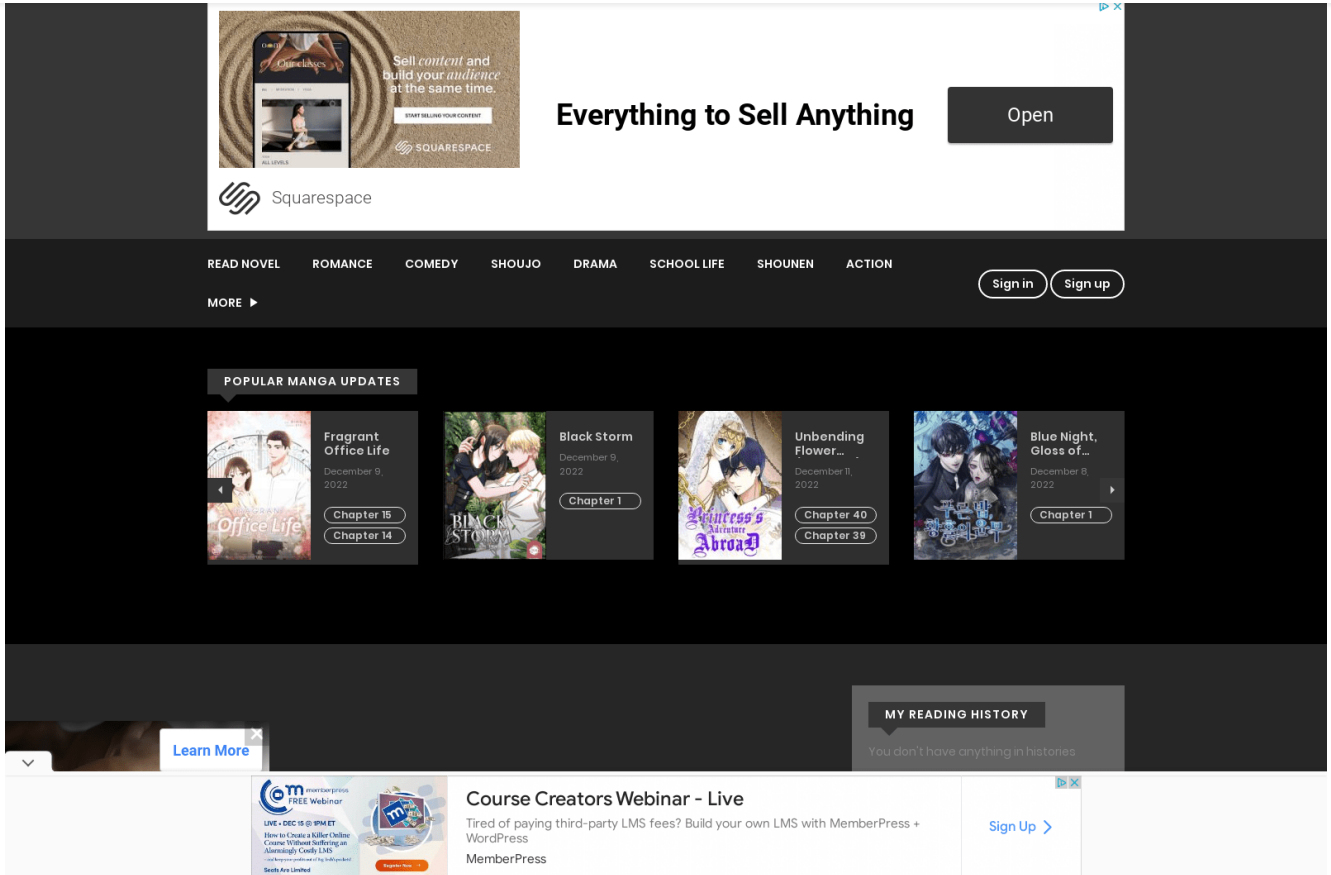


- 
- Google ads may not be displayed on websites with content protected by copyright law unless they have the necessary legal rights to display or direct traffic to that content. Some examples of copyrighted content might include mp3 and video files, television shows, software, comics, and literary works. When a website displays someone else's website within a frame or window on their own site, this is considered framing content. Placing Google ads on such pages is strictly prohibited.
- 

Source: [Google](#)

However, during the course of this research study, it was observed that Fortune 500 brand's TrueView skippable in-stream ads served on websites which had tens of thousands or hundreds of thousands of DMCA copyright violation delistings recorded in Google Transparency Report.

For example, TrueView ads purchased by Interpublic Group's trading desk Matterkind on behalf of the brand Johnson & Johnson were delivered on the website "1stkissmanga.io". In the lower left hand corner of the [URLScan.io bot screenshot](#) below, one can observe a partially obscured Johnson & Johnson ad being served in a muted, auto-playing video player on "1stkissmanga.io" on December 11th, 2022.



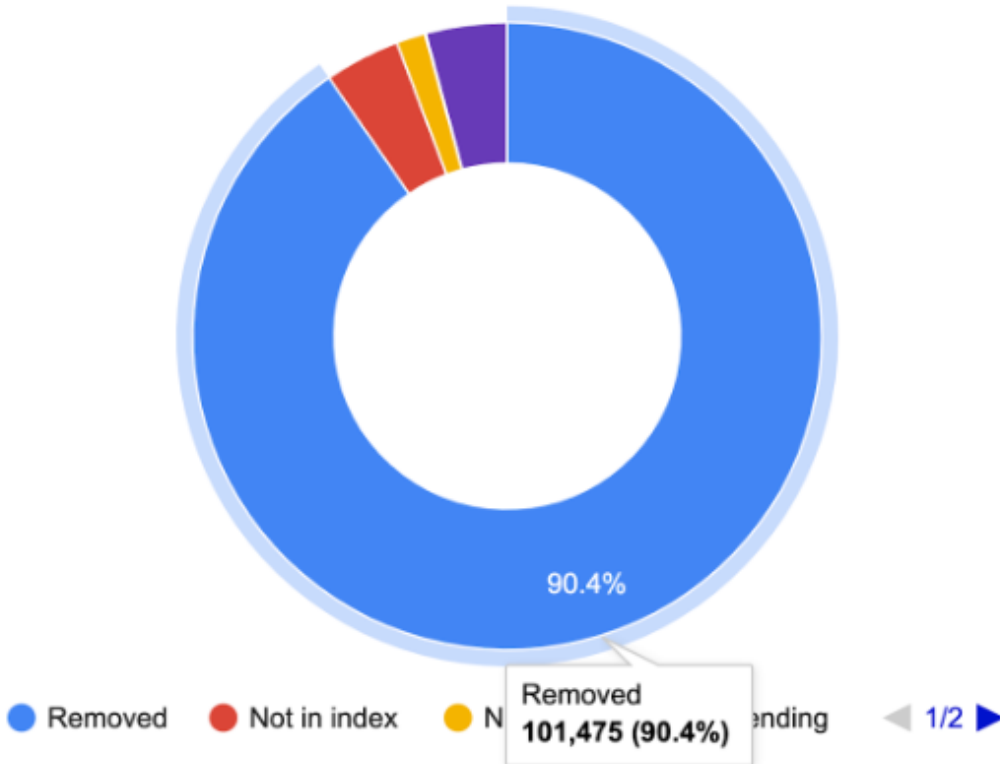
The screenshot shows a website interface. At the top, there is a navigation bar with links for 'About', 'Blog', 'Marketers', 'Contact', and 'Twit'. Below this is a large advertisement for Squarespace with the headline 'Everything to Sell Anything' and a 'Learn More' button. The ad features a small video player showing a woman and text that says 'Sell content and build your audience at the same time.' Below the ad is a dark navigation bar with categories like 'READ NOVEL', 'ROMANCE', 'COMEDY', 'SHOUJO', 'DRAMA', 'SCHOOL LIFE', 'SHOUNEN', and 'ACTION'. There are 'Sign in' and 'Sign up' buttons. Below the navigation bar is a section titled 'POPULAR MANGA UPDATES' with four manga cards: 'Fragrant Office Life', 'Black Storm', 'Unbending Flower...', and 'Blue Night, Gloss of...'. Each card shows a chapter button. At the bottom, there is a 'MY READING HISTORY' section which is empty. A 'Learn More' button is visible on the left side of the bottom section.

**Screenshot** of a Johnson & Johnson TrueView skippable in-stream ad purchased by IPG Matterkind running in a muted, out-stream, auto-playing video player on 1stkissmanga.io, a website that has had over **101,000 DMCA copyright takedowns** according to Google Transparency Report

Cross-referencing the name of the website where this Johnson & Johnson TrueView ad served with the **Google Transparency Report shows that** “1stkissmanga.io” has had over 101,000 URLs removed from Google Search results after Google’s teams reviewed and agreed with as many copyright violation requests.

This domain had 112,255 URLs over 38,012 individual requests requested for delisting from our Search results.

### Specified domain outcomes



This chart shows the outcomes of each URL that has been submitted for this domain.

Screenshot of [Google Transparency Report](#) for “1stkissmanga.io”, showing that Google’s team delisted 101,475 URLs from that website pursuant to copyright violation requests.

In the course of this analysis, data obtained from the Google Transparency report was filtered for domains based on two criteria:

1. Websites that had at least 100 URLs delisted by Google in response to a DMCA copyright infringement request



the publisher). So for example, if a particular domain had 200 DMCA requests filed against it, and Google agreed with the complainants 100 times but did not take action the other 100 times, such a domain was excluded from this analysis (50% is below the 70% threshold).

This analysis of the Google Transparency Report identified 212,659 distinct domains which had over 100 URLs removed pursuant to DMCA copyright claims and for which more than 70% of the claims filed resulted in a removal.

Of those 212,659 identified domains, 462 of the sites appeared in various TrueView skippable in-stream placement reports. For example, four different TrueView placement reports included TrueView ad delivery against the domain “freewebnovel.com”. [Freewebnovel.com has had](#) 49,936 different URLs removed by Google’s review team in response to DMCA copyright claims, and 88% of the claims filed against this website were acted upon by Google’s reviewers.

When analyzing the subset of each TrueView ad buy that went to GVP websites, some campaigns had as much as 5.6% of their GVP webpage budget delivered against publishers with numerous DMCA copyright takedowns.

As mentioned earlier, Google received TAG’s [Brand Safety Certification](#), which requires that any participating company acting as a seller or intermediary must:

- disclose “staff and/or tools/technology used to review or flag content disclosing from media properties associated with piracy.”
- “A participating company acting as a direct buyer, intermediary, vendor or seller should employ a TAG-recognised content taxonomy for harmful content” and “Digital advertisements may not be displayed in association with any content categories” such as “Online Piracy”, “Sensitive Social Issues”, “Death Injury or Military Conflict”.

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Brand Safety Certification.

## TrueView in-stream ads serving on sites that have been labeled as having high bias or low factual accuracy

In October 2022, ProPublica published an [article](#) titled: “How Google’s Ad Business Funds Disinformation Around the World”, which alleged “Google is funneling revenue to some of the web’s most prolific purveyors of false”

The ProPublica [report](#) mentioned that Google “has publicly committed to fighting disinformation around the world, but a ProPublica analysis [...] documented how Google’s sprawling automated digital ad operation placed ads from major brands on global websites that spread false claims.”

As previously discussed, a CNN [investigation](#) previously found that YouTube “Ads from the Washington Post and New York Times appeared on far-right and conspiracy channels like Black Pigeon Speaks and some run by InfoWars.” CNN [reported](#):

YouTube “[advertisements](#) potentially funded by US tax dollars also appeared on the channels promoting North Korean propaganda.”

“It [appears](#) that YouTube did not follow its own protocols and categorize these videos properly,” the New York Times told CNN. The paper said its ads should only appear on a list of pre-approved sites. If the channels are monetized -- which InfoWars has previously claimed they are -- the major newspapers could have unknowingly supported disinformation and conspiracy.”

The study of disinformation and mis-information is a developing field of social science, with no universally agreed upon methodologies. Therefore, any attempts to classify the factual accuracy or biases of a given website is likely to attract reasonable critiques and counter-arguments.

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rating various publishers as sources of disinformation.

As a very superficial and exploratory analysis, this study drew upon the [Media Bias/Fact Check \(MBFC\)](#), a resource which rates sites in two areas: bias and factual accuracy. The Media Bias/Fact check has been [used by researchers](#) at the University of Michigan to create a tool called the "Iffy Quotient", which draws data from Media Bias/Fact Check and NewsWhip to track the prevalence of "fake news" and questionable sources on social media. The MBFC has attracted criticism about its robustness and methodologies from a number of sources, including the Columbia Journalism Review, Poynter Institute, media pundits, and other researchers.

A [study published](#) in Scientific Reports wrote: "While [Media Bias/Fact Check's] credibility is sometimes questioned, it has been regarded as accurate enough to be used as ground-truth for e.g. media bias classifiers, fake news studies, and automatic fact-checking systems."

As part of a very superficial analysis, this study curated a list of websites and domains, for which MBFC rated the given domain as having 'low' or 'very low' levels of factual accuracy.

This list of domains was then compared against the lists of websites and domains where brands' TrueView skippable in-stream ads were served. Approximately 1.7% of brands' TrueView GVP Website budget went to websites which had a 'low' or 'very low' factual reporting rating from MBFC.

For example, one brand had their TrueView skippable in-stream ads previously served on RT.com (Russia Today), which is currently under European Union sanctions over alleged disinformation after the Russian invasion of Ukraine.

Media Bias Fact Check [rates the Russian News Agency TASS](#) as having "Low Credibility", due to "Propaganda" and "Poor Sourcing". One [can observe that](#) the media agency Essence (part of WPP) purchased YouTube TrueView ads



prayer.

As mentioned earlier, the study of disinformation is an evolving social science, and brands or individuals should make their own adjudications as to what methodology they find robust when trying to evaluate various news sources. Adalytics does not necessarily concur with or support the methodology proposed by MBFC; this analysis merely serves as a superficial exploratory demonstration for how one could choose to evaluate how much TrueView in-stream ad budget was spent on disinformation publishers in the Google Video Partner network.

### **TrueView in-stream ads serving on content discussing “sensitive current events like war, death, or tragedy”**

As mentioned in the Background section of this report, Google’s [Video Ad Safety Promise](#) states that “certain types of content can’t be monetized for ads on YouTube and Google video partners: we’ll automatically apply exclusions to prevent your ads from showing on the most controversial content, such as terrorist acts, nudity, and recent sensitive events.”

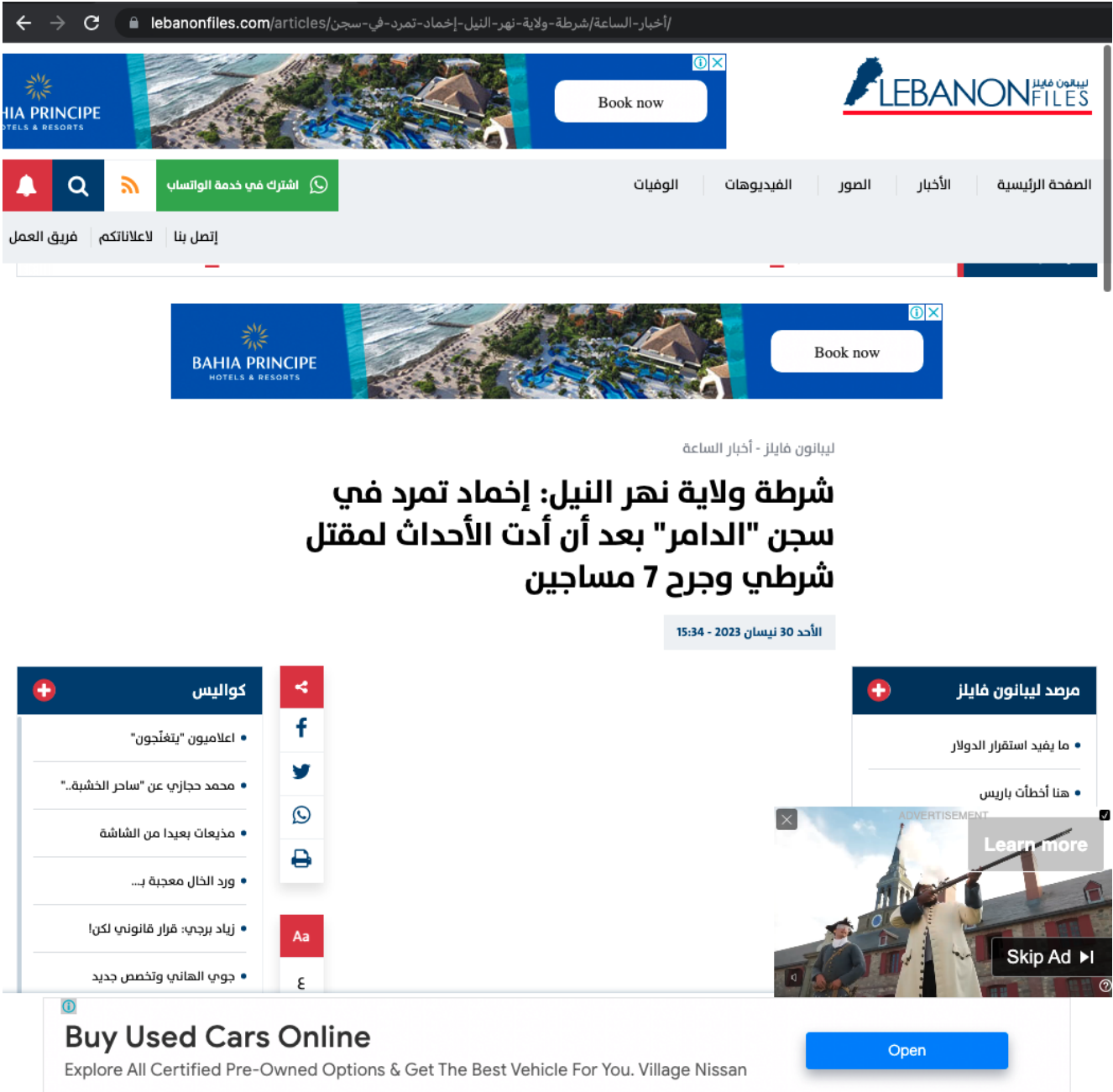
Google’s [online documentation](#) states that “Your ads automatically will be excluded from showing on the following types of content, no matter what inventory type you choose.”, and this list includes “Content discussing terrorism or sensitive current events like war, death, or tragedy”.

However, despite Video Ad Safety Promise, multiple instances of TrueView ads were observed serving on content discussing sensitive current events like war, death, or tragedy. For example, in the screenshot below, one can observe TrueView ads serving in a muted, auto-playing video player for “planyournovascotia.com”. The ads are served on an Arabic news website page -

<https://www.lebanonfiles.com/articles/%d8%a3%d8%ae%d8%a8%d8%a7%d8%a7%d9%84%d8%b3%d8%a7%d8%b9%d8%a9/%d8%b4%d8%b1%d8%b7%d9%88%d9%84%d8%a7%d9%8a%d8%a9-%d9%86%d9%87%d8%b1->

%U8%aa%U9%85%U8%U1%U8%aI-%U9%81%U9%8a-

%d8%b3%d8%ac%d9%86/". The title of the page translates to: "River Nile State Police: Putting down a revolt in "Al-Damer" prison, after the events led to the death of a policeman and the wounding of 7 prisoners".

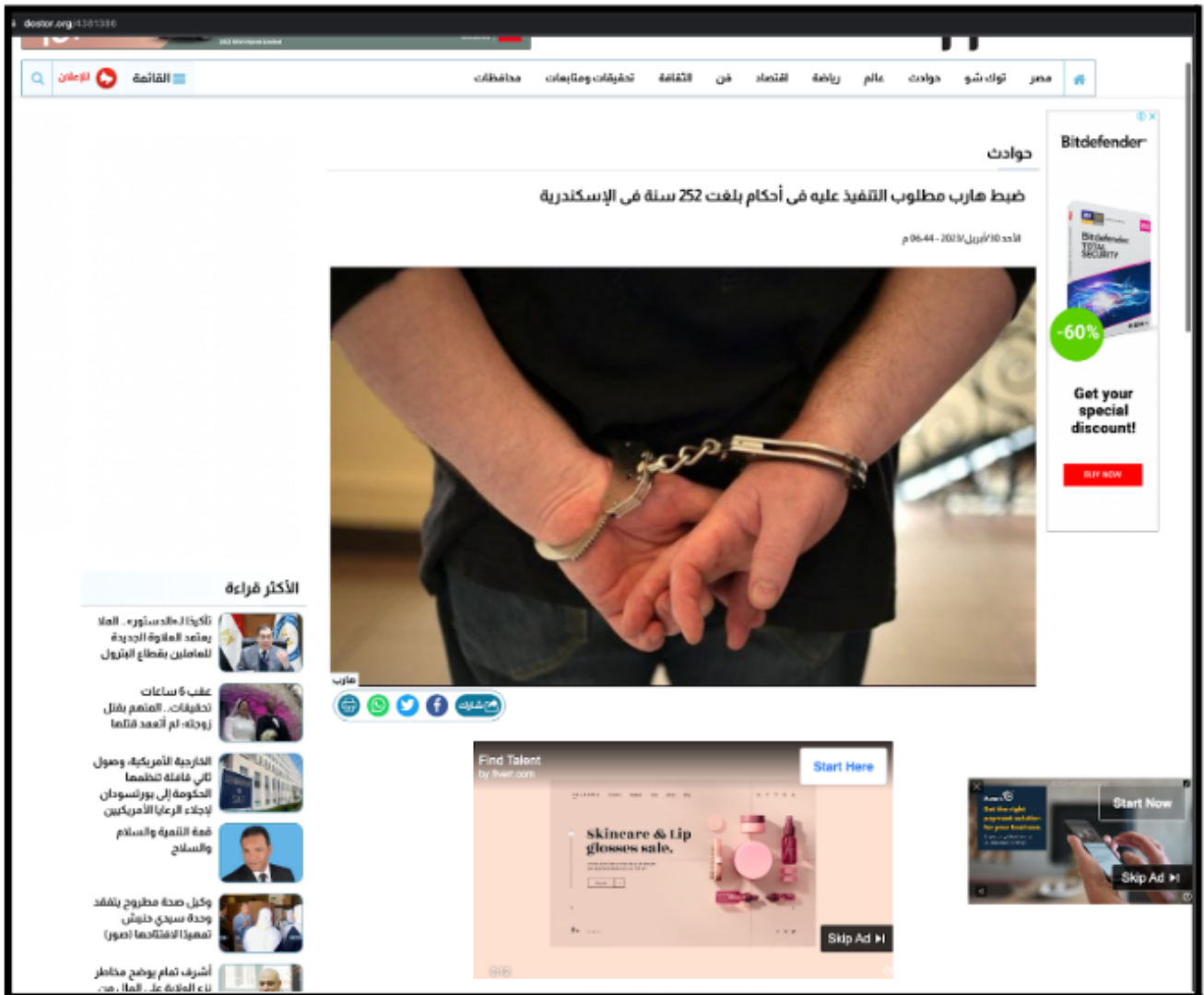


The screenshot shows a news article on the website Lebanonfiles.com. The article title is "شرطة ولاية نهر النيل: إخماد تمرد في سجن 'الدامر' بعد أن أدت الأحداث لمقتل شرطي وجرح 7 مساجين" (Nile State Police: Putting down a revolt in 'Al-Damer' prison after the events led to the death of a policeman and the wounding of 7 prisoners). The article is dated 30 Nisan 2023, 15:34. A TrueView skippable in-stream advertisement for Bahria Principe Hotels & Resorts is displayed above the article content. The ad features a scenic view of the resort and a "Book now" button. Below the article, there is a sidebar with social media sharing options (Facebook, Twitter, WhatsApp, Print) and a list of related articles. At the bottom of the page, there is another TrueView skippable in-stream advertisement for "Buy Used Cars Online" from Village Nissan, featuring a car and a "Skip Ad" button.

Screenshot of a TrueView skippable in-stream ad serving on an article about: "River Nile State Police: Putting down a revolt in "Al-Damer" prison, after the events led to the death of a policeman and the wounding of 7 prisoners"

In another instance, TrueView in-stream ads for Fiverr and for Canadian fintech Moneris were observed running at the same time, in muted, out-

be executed in provisions amounting to 252 years in Alexandria .



Screenshot of two TrueView in-stream ads serving simultaneously in muted, auto-playing, out-stream video slots on an article discussing the criminal penalties and execution

In a third example, TrueView in-stream ads for the online game Eve Online and for **Murphy Wall Beds** were **observed** serving in a muted outstream video player on **newsmax.com**. The title of the particular **Newsmax article** was - “9 Dead, Including Shooter in Allen, Texas, Mall Massacre”.

# NEWSMAX

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Tags: texas | mass shooting | mall | police | active shooter

## 9 Dead, Including Shooter in Allen, Texas, Mall Massacre



By Eric Mack | Saturday, 06 May 2023 11:41 PM EDT

Facebook | Twitter | Email | LinkedIn | Comment | Print | A A

Listen to this Newsmax article

0:00 / 1:54 1x

A gunman shot and killed eight people and wounded at least seven others at a busy mall north of Dallas on Saturday, police said.

The gunman, whom authorities said they think acted alone and whose motive was not yet known, was killed by a police officer after

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The particular video in question on Newsmax makes public references to childrens' deaths.

It is unclear whether the placement of TrueView skippable in-stream ads on this particular Newsmax article are consistent with Google's [Video Ad Safety Promise](#), or the Media Ratings Council's YouTube accreditation for brand safety.

As mentioned earlier, Google received TAG's [Brand Safety Certification](#),

- “A participating company acting as a direct buyer, intermediary, vendor or seller should employ a TAG-recognised content taxonomy for harmful content” and “Digital advertisements may not be displayed in association with any content categories” such as “Online Piracy”, “Sensitive Social Issues”, “Death Injury or Military Conflict”.

It is unclear whether serving TrueView in-stream ads on articles about executions or children being murdered is consistent with Google’s Brand Safety Certification.

## TrueView in-stream ads serving on “made-for-advertising” websites

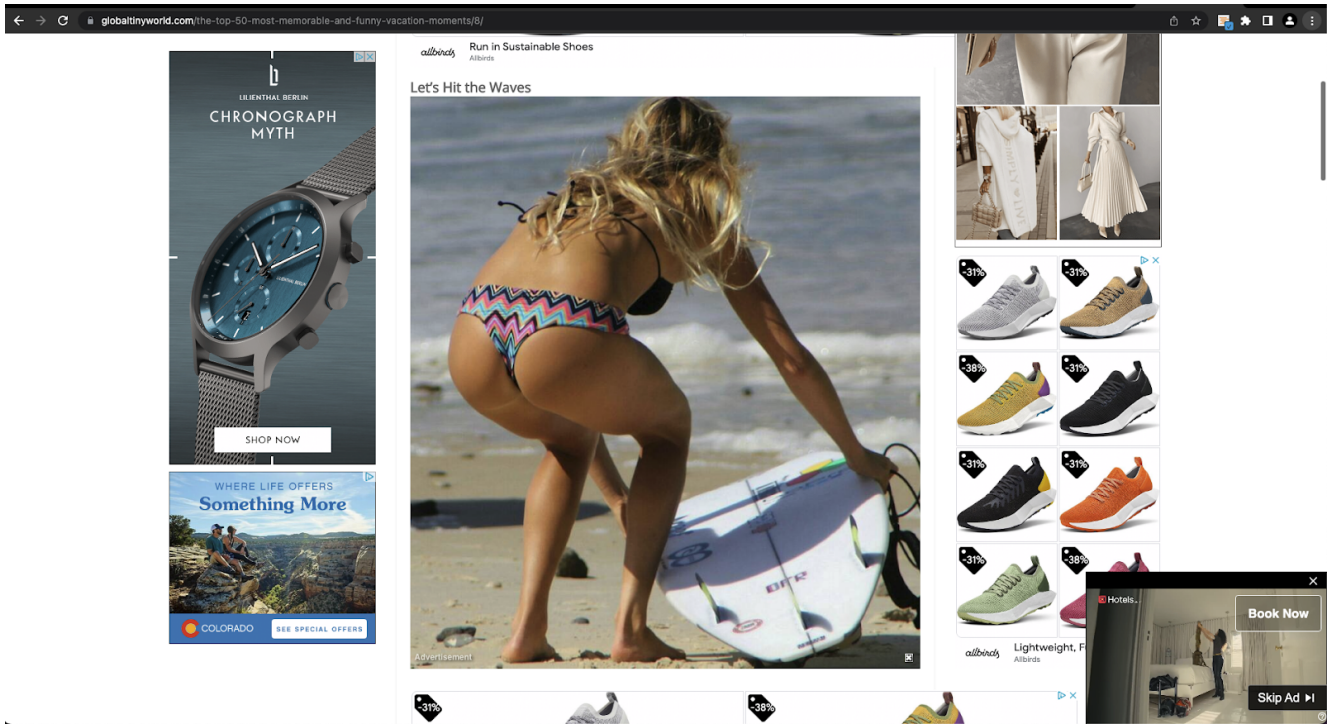
Many TrueView in-stream ads were observed delivering on so-called “Made for Advertising” (MFA) sites.

Publisher quality intelligence vendor [DeepSee.io describes MFA sites as publishers](#) who meet the intersection of 3 factors:

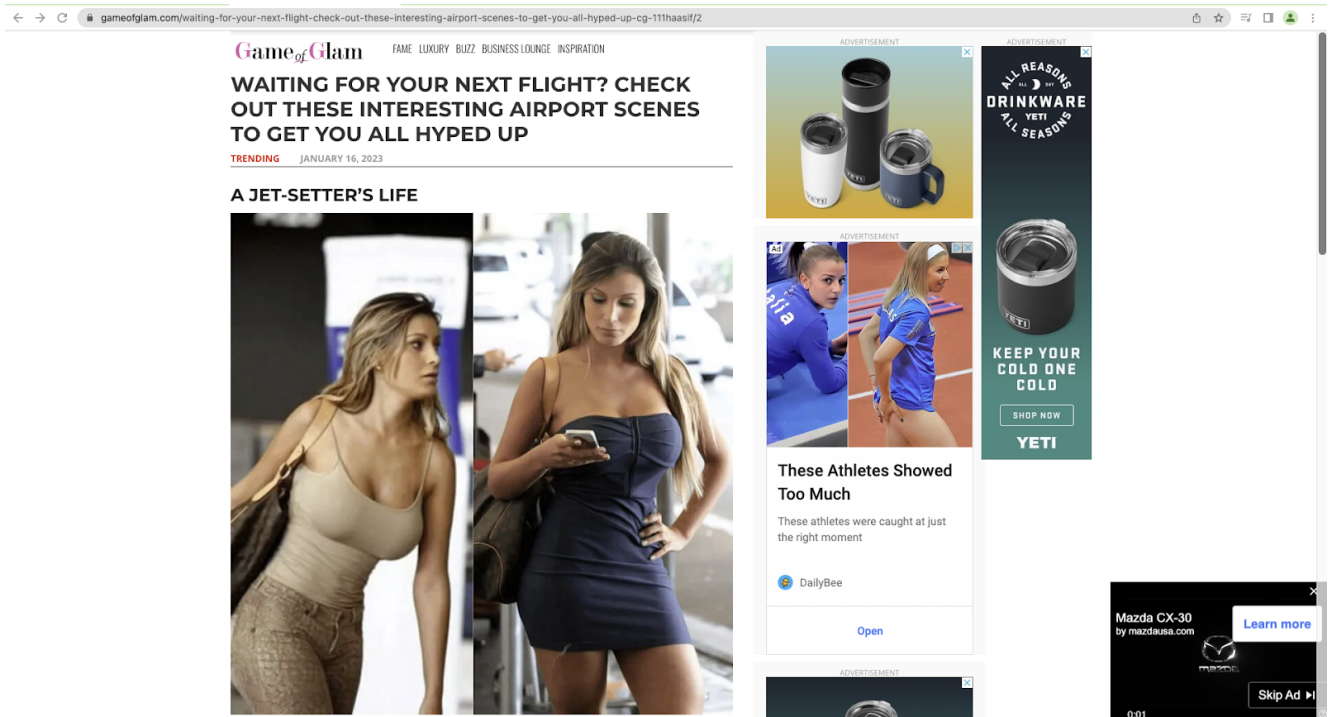
1. Highly paid inbound traffic audience mix (e.g., the majority of site visitors come to the site by first clicking on an ad, rather than through direct browsing, clicking on a backlink from another site, or through search engine results)
2. Excessively high density & frequency of advertisements (for example: showing 10+ ads at the same time, and refreshing the ad slots every few seconds)
3. Click bait content, often syndicated across an entire family of MFA sites

Many TrueView ads were on Google Video Partner publishers which are on DeepSee.io’s MFA list. For example, in the screenshot below, one can observe a hotels.com TrueView skippable in-stream ad serving in a muted, auto-playing out-stream video player on a site where a significant proportion of the screen is covered in ads, the ads auto-refresh, and a significant





In another example, one can observe a muted, auto-playing TrueView ad for the car brand Mazda serving on “gameofglam.com”, adjacent to large numbers of other ads that auto-refresh.



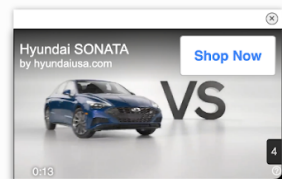
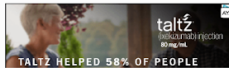
In another example, one can observe an American Express TrueView ad



added weight could possibly become a problem, which it did.



The inevitable happened when the entire thing tipped over, and one by one, the prom kids began falling into the water. Though the moment must have totally sucked, at least they can laugh together about it today.

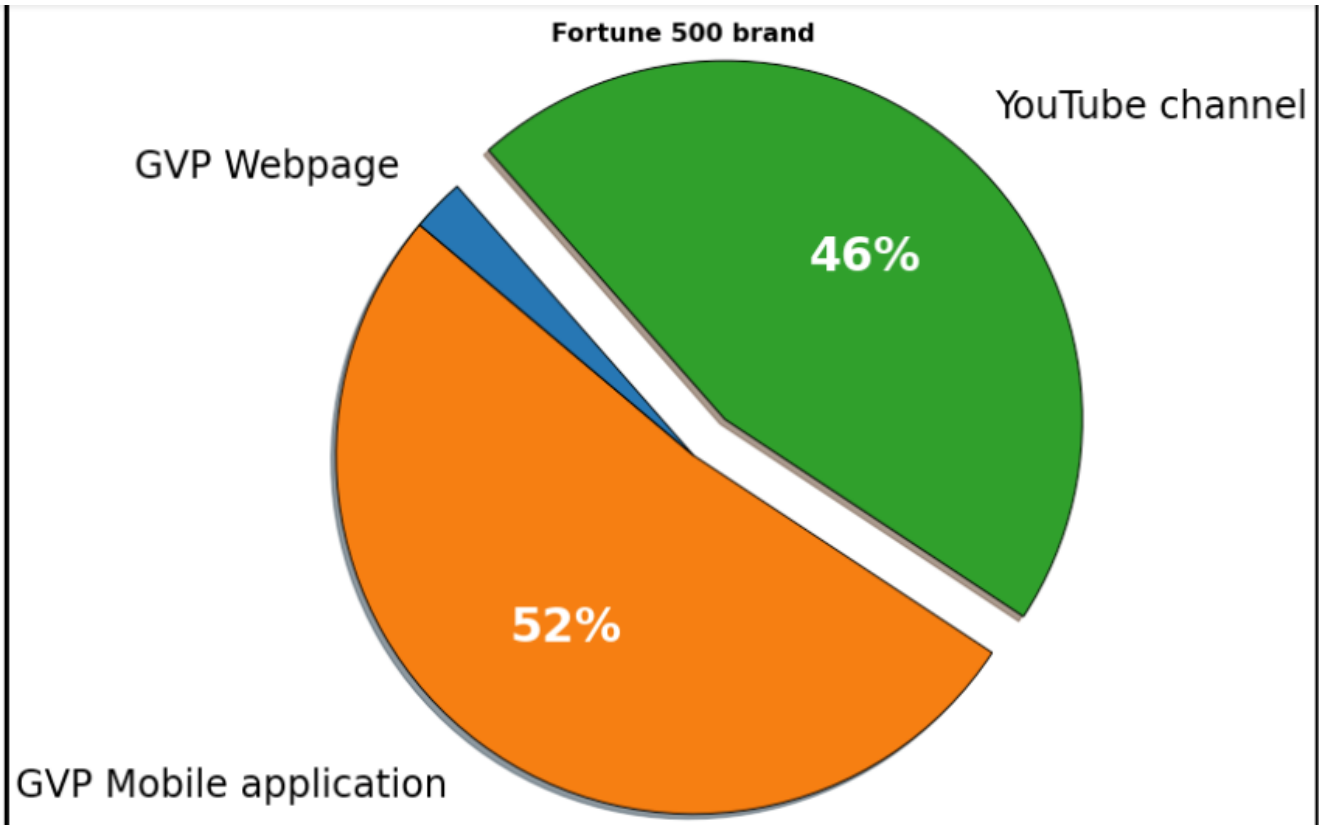


Using DeepSee.io’s industry leading list of Made for Advertising domains, it was calculated that 12.3% of the budget spent on Google Video Partner (GVP) sites is spent on MFA publishers. There were 1090 distinct MFA publishers from DeepSee.io’s list that appeared in various brands’ TrueView campaign reports.

### Analyzing Google Video Partner (GVP) mobile apps

In addition to carefully analyzing the 3rd party websites that appear in brands’ TrueView in-stream placement reports, this study sought to evaluate the Google Video Partner mobile applications where TrueView ads were being delivered.

For one of the Fortune 500 brands analyzed in this study, more than than 50% of their TrueView in-stream campaign budget was delivered against GVP mobile applications.



There were over 25,000 unique mobile applications against which TrueView ads were reported as delivering against. This included:

- Google Play Store Android mobile apps
- Apple App Store iOS mobile apps
- Amazon Appstore apps
- Apps that have been removed or delisted from the app stores
- Apps that are unlocatable in the Android, iOS, or Amazon app stores
- Apps that appear to be “sideloaded”
  - According to [Wikipedia](#), “When referring to Android apps, “**sideloading**” typically means installing an application package in APK format onto an Android device. Such packages are usually downloaded from websites other than the official app store Google

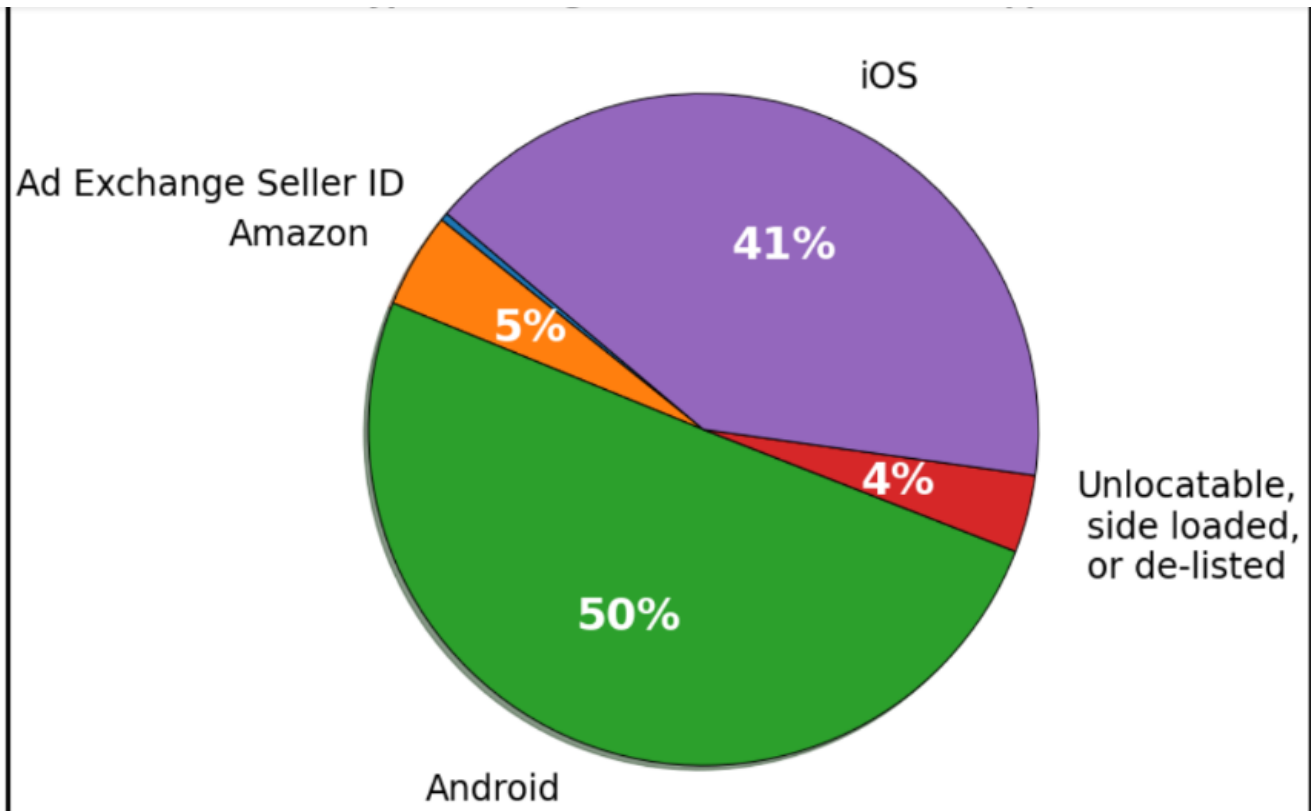
[About](#)[Blog](#)[Marketers](#)[Contact](#)[Twit](#)

- Google ad exchange seller IDs that appear in placement reports in lieu of an app name or bundle, which makes it impossible to know exactly against which app ads were delivered against

## **Over 80% of the TrueView spend going to mobile apps is allocated to gaming apps**

To analyze the mobile apps against which video ads were being delivered in brands' TrueView in-stream placement reports, first all app placements were categorized as one of the following, based on their app name and/or app bundle:

- Android apps (50% of GVP mobile app budget)
- iOS apps (41% of GVP mobile app spend)
- Amazon apps (5% of GVP mobile app budget)
- Unlocatable, side loaded, or de-listed apps (4% of GVP mobile app spend)
- Ad Exchange seller ID in app name rather than actual name of mobile app where ad served (~0.4% of mobile app spend)

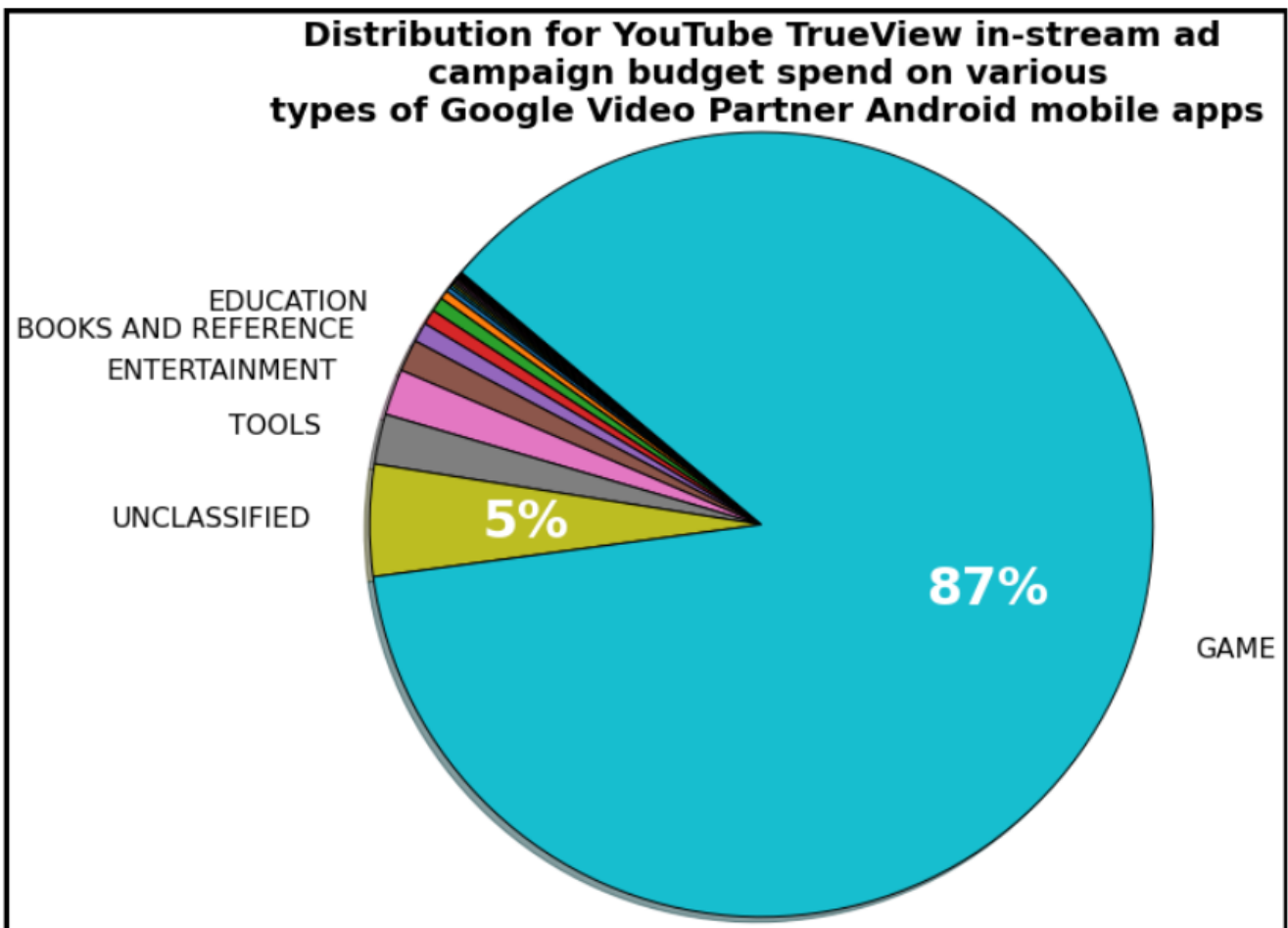


Secondly, the apps from the Android or iOS app stores where TrueView ads were served were analyzed by app type. For example, one can manually check the Google Play Store and see how a given app is characterized. For the app “Happy Color®: Coloring Book” Android app is labeled as a “Game” - <https://play.google.com/store/apps/details?id=com.pixel.art.coloring.color.number&hl=en&gl=US>

The top Android apps across the different brands’ TrueView placement reports by ad budget spent were primarily games. The top five apps by collective TrueView spend were:

1. Happy Color®: Coloring Book
2. Candy Crush Saga
3. Words With Friends Crosswords
4. Crossword Jam
5. TPlayer - All Format Video

or spend was allocated to Gaming apps. 2.1% of spend was allocated to Tools apps, such as “[Bravo Cleaner](#)”, an “an Android application for junk file removing” or “[CC FileManager](#)”, a file manager, or “[Normal VPN - Stable&Safe Proxy](#)”, an app with 50+ million downloads whose developer contact email address is a Protonmail email, Privacy Policy doesn’t list any official corporate address, and whose corporate [landing page](#) miss-spells “Terms of Use” as “Term of user”.



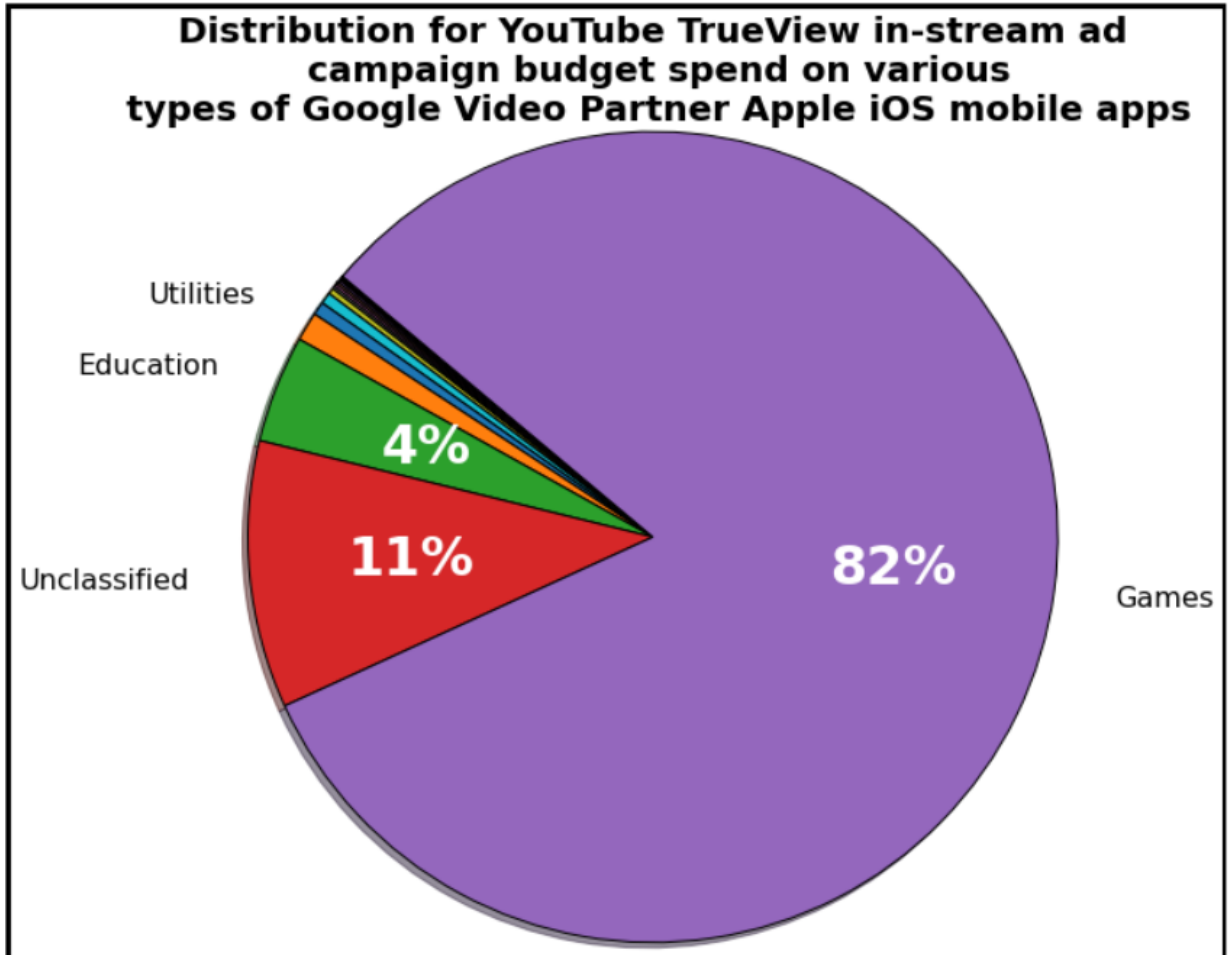
Similarly, the proportion of TrueView ad budget allocated to Apple iOS mobile apps is dominated primarily by mobile gaming apps. Of the sub-set of YouTube TrueView ad spend allocated to Apple iOS GVP mobile apps, 82% was spent on various gaming apps. Besides unclassified apps, the second largest category by spend was Education related apps. The top five iOS apps, by percent of spend, were:

1. [Words With Friends – Word Game](#)

3. [Wordscapes](#)

4. [Solitaire](#)

[Candy Crush Saga](#)



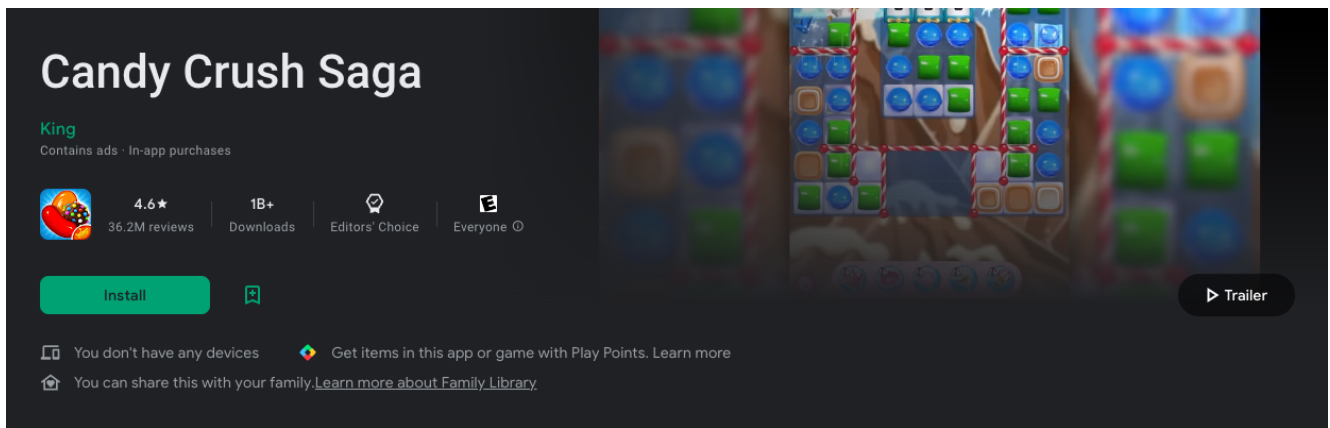
- As discussed in the “Background” section of this report, Google’s [public online documentation](#) states that “games” are a type of "non-in-stream video placements”, which would likely make them in-consistent with the requirements for TrueView in-stream video ads.

Furthermore, a separate section of Google’s [public online documentation](#) states that “Out-stream video ad formats include: [...] Interstitial ad units - rich, full-page ads in your app. Place them at natural breaks and transitions in your app's interface, such as at launch, after level completion in a gaming



# Majority of ad spend on GVP mobile apps is going to non-US-based publishers

For the proportion of TrueView ad spend going to GVP Android mobile apps, one can analyze which of those Android apps are registered to developers based in foreign countries. The Google Play Store lists a public "developer address" for many Android mobile apps, which can sometimes (but not always) be used to deduce where the publisher of a given Android app is based.



### About this game →

Master the legendary match 3 puzzle game from King! With over a trillion matching levels played, Candy Crush Saga is the popular match 3 puzzle game.

Match, pop, and blast candies in this tasty puzzle adventure to progress to the next level and get a sugar blast! Master match 3

### Developer contact ^

Website  
<http://candycrushsaga.com>

Email  
[candycrush.techhelp@king.com](mailto:candycrush.techhelp@king.com)

Address  
King.com Limited Aragon Business Centre, Level 4, Dragonara Road, St Julians STJ3140, **Malta**

Privacy policy  
<https://king.com/privacyPolicy>

Screenshot of Google Play Store for Candy Crush Saga, showing the app developer is based in Malta.

Of the sub-set of TrueView ad budget that was allocated against Google Video Partner Android mobile apps, 22.3% was spent on Android apps whose developer is registered in the United States. 14.3% was spent on apps developed by entities registered in China, and 9.6% was spent on apps whose developer is registered in Cyprus.

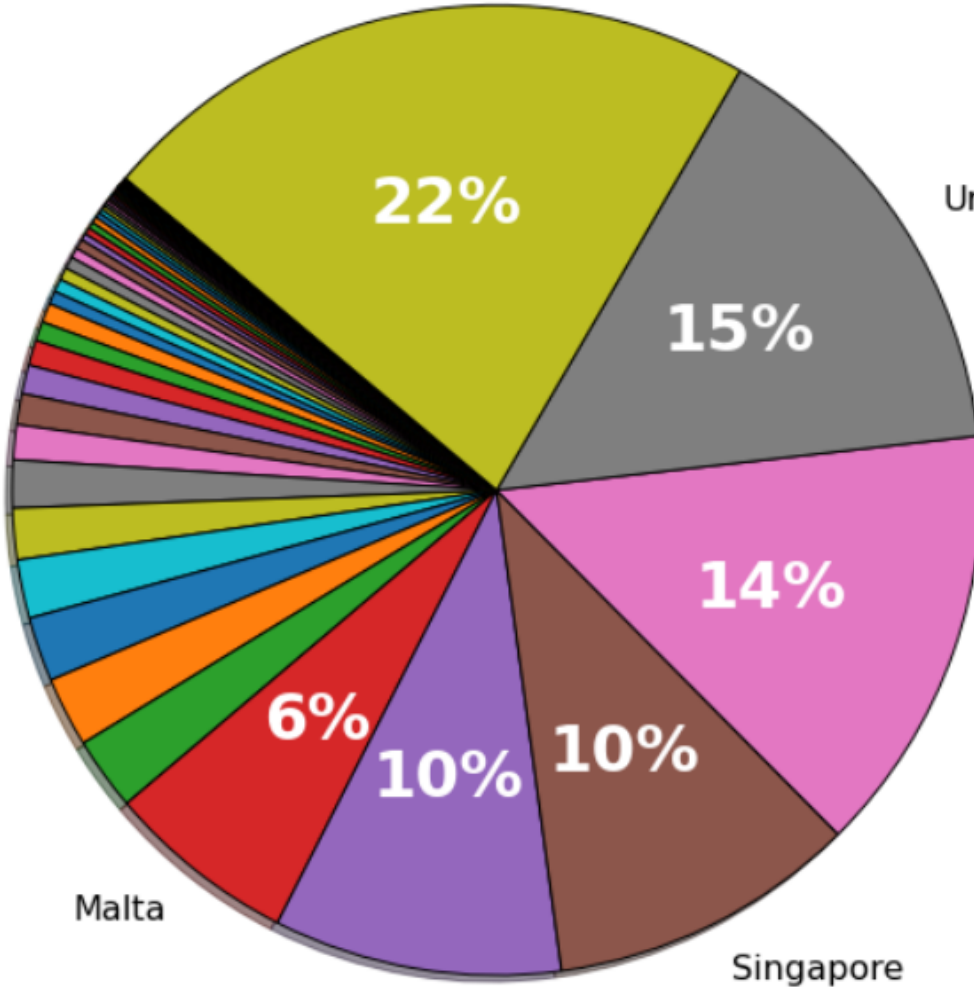


- 
- Unknown - 14.84%
  - China - 14.34%
  - Singapore - 10.31%
  - Cyprus - 9.61%
  - Malta - 6.36%
  - Germany - 2.44%
  - Turkey - 2.33%
  - United Kingdom - 2.15%
  - Israel - 1.95%
  - Denmark - 0.64%
  - Russia - 0.08%

For example, one brand had several hundred dollars worth of TrueView ad spend delivered against the Word Game “[Word Crush - Fun Puzzle Game](#)”, whose developer “TangramGames” is registered in Beijing.

**types of Google Video Partner Android mobile apps  
% of GVP Android budget going to developers in various countries**

United States of America

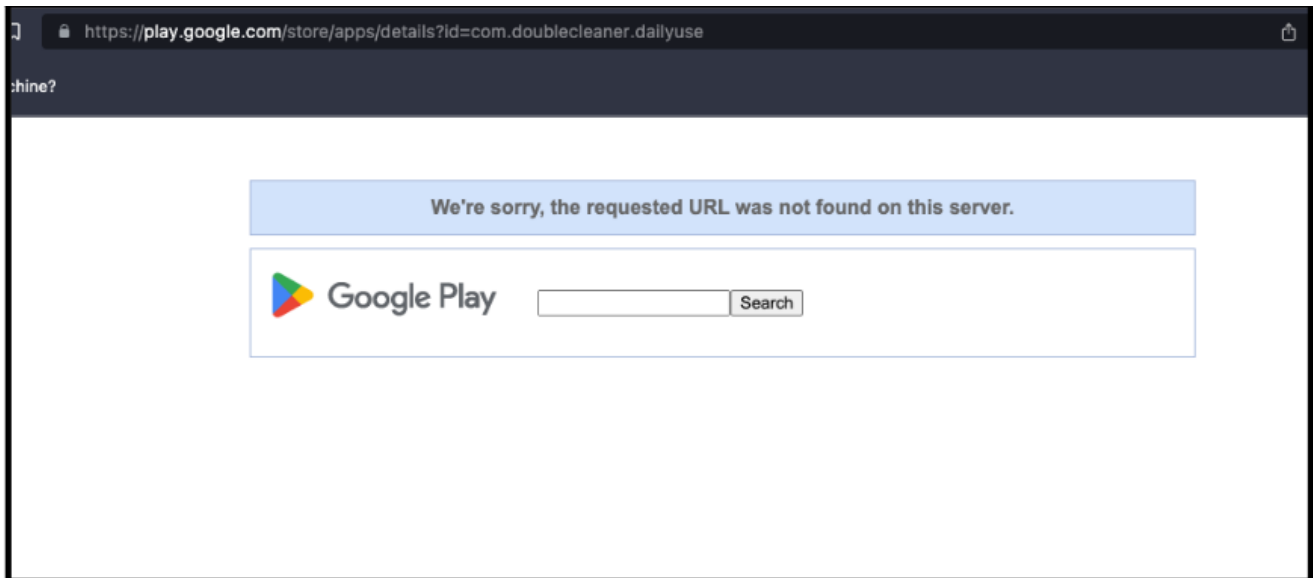


**TrueView ads served on side-loaded apps**

Of particular interest was the observation that approximately 4% of brands' TrueView in-stream ad budget was delivered against mobile apps that appeared to be un-locatable or delisted from the Google Play Stores.

For example, several brand appeared to have TrueView in-stream ad delivery in their placement reports against the Android mobile app " Double Cleaner" (app bundle id "com.doublecleaner.dailyuse"), whose app store URL was:

["https://play.google.com/store/apps/details?"](https://play.google.com/store/apps/details?)



Screenshot of the [Google Play listing](#) for the “Double Cleaner” Android mobile app

Generally speaking, it can be hard to differentiate between apps that were delisted versus apps that are sideloaded. [Sideloading](#) refers to “installing an application package in APK format onto an Android device. Such packages are usually downloaded from websites other than the official app store Google Play. For Android users, sideloading of apps is only possible if the user has allowed “Unknown Sources” in their Security Settings.”

However, some apps appear to have never been listed on the Google Play Store in the first place, or were not listed in the recent past. Furthermore, for these apps, there are multiple sources offering consumers the option of downloading those apps via sideloading a raw .apk file.

For example, some brands had significant TrueView in-stream delivery against the mobile app bundle “ir.topcoders.nstax” - the “Insta X (Free Advanced Instagram)” mobile app. This app bundle does not appear on the Google Play Store, however, multiple sources in search engine results offer to allow consumers to download the raw .apk file to sideload these apps onto their Android devices.

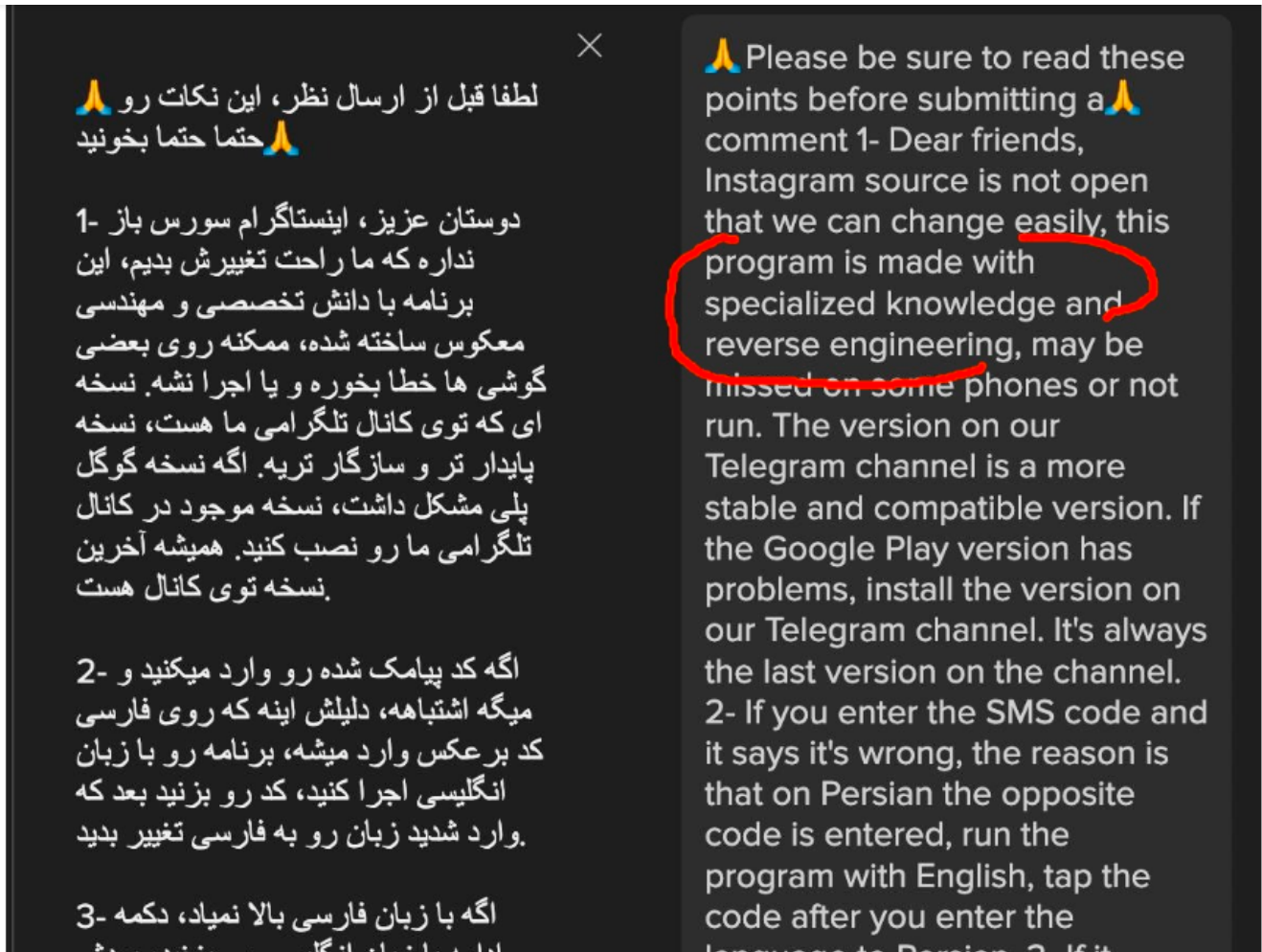
**TrueView ads served on publishers that are potentially under US Treasury**

**sanctions” that** have the effect of prohibiting U.S. persons from participating in most transactions, collaborations and activities with certain countries. With few exceptions, the U.S. will bar most transactions, collaborations or activities involving a comprehensively sanctioned country or individuals and entities from those countries.”

Iran is one country **which is under** “comprehensive sanctions”.

The United States Department of Treasury, Office of Foreign Assets Control (OFAC), **“has the primary authority** to regulate sanctions under the Iranian Transactions and Sanctions Regulations (ITSR) under 31 CFR Part 560.” The “ITSR will generally require authorization from OFAC for any U.S. person who wishes to conduct any transaction or engage in any activity with the country of Iran, or specially sanctioned individuals or entities under the ITSR.”

Some \*TrueView placement reports had significant volumes of budget allocated to apps such as **“ir.topcoders.nstax”** - “Insta X (Free Advanced Instagram)”. This app is described as “The most up-to-date Free Persian Instagram.” The app was “made with specialized knowledge and reverse engineering”.



The [developer](#) behind "Insta X (Free Advanced Instagram)" or `ir.topcoders.nstax` is Ramin Eftekhari, an Iranian software engineer based in [Tehran, Iran](#).

He [completed](#) his Master of Sciences degree in computer software engineering at Raja University of Qazvin. His [thesis](#) was the static analysis of android apps for finding malware.

As mentioned earlier, Google received TAG's [Brand Safety Certification](#), which requires that any participating company acting as a seller or intermediary must:

- “must employ pirate mobile app filtering for all advertising displayed in a mobile app environment.”

with Google's TAG Brand Safety Certification or Google's video Ad Safety Promise.

Another mobile app that appeared in brands' TrueView placement report was "info.sunista.app". "[Sunista is a modded Persian version of Instagram Messenger](#)", and also described as "Sunista is a modded version of the popular social media app Instagram for Android, [developed by an Iranian team.](#)"



### Screenshot of the landing page for the Sunista mobile app

On Tuesday April 4th, 2023, a user [posted a thread](#) on Reddit titled: "Refusal by Google to remove fraudulent Apps from Display targeting." The thread mentions that the media buyer had large amounts of allegedly fraudulent ad impressions delivered against the "ir.topcoders.nstax" and "info.sunista.app". The media buyer claimed:

"For a few days, we have an app, that is drawing ridiculous amounts of impressions compared to our other URLs. We're talking 10's of thousands of impressions when other URLs and apps have maybe 100. These are called: mobileapp::2-info.sunista.app and mobileapp::2-ir.topcoders.nstax When we try to exclude these from the campaign, we get an error message saying they



could not remove these links from our targeting. A few hours later they explained: "This email is in regards to the query which you have raised about excluding the placements in your Google Ads account XXXXXXXXXX. As discussed, we have escalated the query to the concerned team and found that there is no issue at our end. 1) Maybe the URL that you are trying to exclude doesn't exist as mentioned in the error message, please try to exclude it by app ID if you have one. 2) Or the app might have been removed or changed its name/id or maybe it's not even connected to the google network. That is the reason we were able to remove the other placements but not these." They cannot be serious, can they? If the apps are not connected to them or not exist, then why are they still showing thousands of impressions on those platforms today? These seem like clear click fraud apps. Did anyone have a similar issue? Or anyone have an idea how to solve this? I'm thinking of just going whitelist, which will massively reduce the reach of the campaign, but at this point seems to be the only way to move forward..."

If this anonymous Reddit post is accurate - it is unclear whether it is consistent with Google's TAG Brand Safety Certification.

## **TrueView ads served on mobile apps which do not properly disclose they contain ads**

Google's [online public documentation](#) states that Android app developers must inform prospective app users whether or not a given mobile app contains advertising. Consumers can see these labels on the Google Play store. For example, in the screenshot of the [Google Play Store listing for the Duolingo](#) mobile app below, one can see the "Contain ads" label underneath the name of the app.





# Duolingo: language lessons

Duolingo

Contains ads

In-app purchases

**“Contains ads” label**

4.5★

15M reviews

100M+

Downloads



Editors' Choice

E

Everyone

Install on more devices



You don't have any devices



You can share this with your family. [Learn more about Family Library](#)

Screenshot of the [Google Play Store listing](#) for the Duolingo mobile app, showing the “Contains ads” label

Google’s [public online documentation](#) states that app developers “must declare whether or not your app contains ads,” and that: “Apps that contain ads will have a “Contains ads” label shown on their store listing. This label will be visible to all Play Store users.”



4. Save your changes.

### Ads

**You must declare whether or not your app contains ads.** This includes ads delivered through third-party ad SDKs (Software Development Kit), display ads, native ads, and/or banner ads). Apps that contain ads will have a "Contains ads" label shown on their store listing. This label will be visible to all Play Store users.

**Note:** The "Contains ads" label isn't meant to cover whether an app contains other kinds of commercial content, like paid product placement or offers to make in-app purchases or upgrades. If your app includes paid product placements, make sure they comply with local laws.

### Declare whether or not your app contains ads

1. Open Play Console and go to the [App content](#)  page (**Policy > App content**).
2. Under "Ads," select **Start**.
  - **Note:** If you've previously declared whether or not your app contains ads and you want to make changes, you'll see and select **Manage** instead of **Start**.
3. Review the [Ads policy](#)  to make sure your app is compliant, and select **Yes** or **No**.
4. Save your changes.

### Examples

Here are a few examples of when you should answer "yes" to having ads for purposes of the "Contains ads" label. This isn't a comprehensive list but just a few examples based on the most common types of ads.

- **Banner and interstitials:** My app integrates with an Ad SDK to show banners and/or

Source: [Google](#)


Furthermore, Google's [online public documentation](#) states that while Android app developers are "responsible for accurately declaring ad presence in your apps, Google may verify this at any time and display the "Contains ads" label if appropriate." The documentation also states that "If you misrepresent the presence of ads in your app(s), it's considered a violation of the Google Play policies and may result in your app(s) being suspended."

### Additional monitoring

**While you're responsible for accurately declaring ad presence in your apps, Google may verify this at any time and display the "Contains ads" label if appropriate.**

If you think your app has been incorrectly labeled by our system, [contact our support team](#) for help.

### Enforcement

If you misrepresent the presence of ads in your app(s), it's considered a violation of the [Google Play policies](#)  and may result in your app(s) being suspended.

[About](#)[Blog](#)[Marketers](#)[Contact](#)[Twit](#)

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Congress that the fees the Google Play Store charges app developers are meant to cover the costs that go into distributing apps through their platforms and [securing them appropriately](#).

However, despite Google's written policies requiring that Android app developers transparently disclose whether a given app contains digital advertising, this research study found 202 Android apps appearing in brands' TrueView in-stream ad campaign reports, wherein the Android apps do not disclose that the apps contain ads.

For example, the Android mobile app "Match 3D Master Matching Games" appears in TrueView ad campaign placement reports as a Google Video Partner. However, the [Google Play Store listing for this particular app](#) is noticeably missing the "Contain ads" designator. In addition to the fact that this Android app appears in multiple ad campaign reports, it also contains numerous user reviews which complain about the large amounts of ads serving in these apps.

# Match 3D Master Matching Games



**Better Life - Color and Draw**  
In-app purchases

4.8★  
61.5K reviews

1M+  
Downloads

E  
Everyone ⓘ

[Install](#) [Add to wishlist](#)

[You don't have any devices](#) [You can share this with your family. Learn more about Family Library](#)

Screenshot of the [Google Play Store listing](#) for the Match 3D Master Matching mobile app, showing the “Contains ads” label is noticeably absent, despite the fact that TrueView ads were served on this Android app.

Other examples of Google Play Store apps which appear in TrueView advertisers’ placement reports, but do not follow Google’s policies requiring they disclose the “Contains ads” label, include:

- [Find the Difference - Spot it](#)
- [Bingo Frenzy-Live Bingo Games](#)
- [Harry Potter: Hogwarts Mystery](#)
- [Board Kings: Board Dice Games](#)
- [Love & Pies - Merge Mystery](#)
- [Farm Blast - Merge & Pop](#)
- [Ludo Club - Dice & Board Game](#)

- 
- [Streamer Rush](#)
  - [Destiny Run](#)

In total, this study found TrueView ads delivered on 202 different Android apps, for whom the Google Play Store listing does not accurately include the “Contains ads” label.

As mentioned earlier, Google’s [public online documentation](#) states that “Google video partners are high-quality publisher websites and mobile apps where you can show your video ads to viewers beyond YouTube” (emphasis added). “Video partner publishers are carefully vetted and must meet Google’s inventory quality standards.’

It is not clear whether Google’s careful vetting of its video partners includes validating whether or not those video partners are complying with Google’s written policies on disclosing the presence of apps in games. Google’s [documentation](#) states that “If you misrepresent the presence of ads in your app(s), it’s considered a violation of the Google Play policies and may result in your app(s) being suspended.”

### **TrueView ads served on mobile apps meant for young children & toddlers**

During the course of this study, it was observed that advertisers’ TrueView skippable in-stream ads were being served on mobile apps intended for young children.

For example, some brands had their ads served on the Android “[Educational Puzzles for Kids](#)” mobile app. Based on [consumer reviews](#), this app is generally used by children as young as two years old.

**KiDEO**

Contains ads · In-app purchases

 4.1★  
9.09K reviews


 10M+  
Downloads

 Teacher Approved

 Everyone

Install

 Add to wishlist

 You don't have any devices

 You can share this with your family. [Learn more about Family Library](#)

**About this app** →

This game is for preschoolers and kids who want to learn basics of 11 languages.

By Educational Fun Puzzles for Kids (Preschool) your child gets an extra portion of educational puzzles. There are +60 puzzles available in 6 different categories (Alphabet & Numbers, Colors and Shapes) in 11 languages: English, Arabic, Russian, Spanish, Portuguese, German, French, Polski, Dutch, Italian and Turkish.

...

Numerous parents expressed concerns about the ad serving experience in this app:

- "The ads are ridiculously intrusive. My 2 year old can hardly complete a puzzle because the ads are so large and easy for little fingers to accidentally click on. The she gets stuck in accidentally loop of trying to exit the app to get back to her game. They should just have the ads at the beginning for the adults to deal with and have a clear screen for the kids to play on. Would rate 0 if I could."
- "I love this game for my 2 year old. My only complaint are the ads that come up that my child clicks on. Which are not appropriate for a 2 year

store. Because of these ads I'm deleting this wonderful app that otherwise would be great."

- "Ads?! My 18 month old cannot read and I sure as heck am not purchasing a game that would try to get click bate from toddlers accidentally clicking. Game would be great if it weren't for the ads.... uninstalling this and I would recommend not installing until they fix this issue"

Another group of advertisers - including Fortune 500 brands - had their TrueView in-stream ads delivered on the “[Cars for kids - Car builder](#)” Android app.

## Cars for kids - Car builder

BonBonGame.com

Contains ads · In-app purchases

**3.7★**

10.4K reviews

**10M+**

Downloads

**E**

Everyone

Install

Add to wishlist




**About this game** →

Now, it's the time for your kids to build a car! Help them learn more about car tuning and car sounds, and have fun playing some Car Simulator games.

Car Builder, as the name suggests, is a free car puzzle game for kids and you get to Build a Car, tune cars and other vehicles in a modern motor world car factory. Other than tuning and building Cars for kids, you also get to build, tune other vehicles and get familiar with their sounds and pronunciations of different sections of Car Simulator...

- “Please add a way to pay to remove ads. The state of the app right now needs a constant guidance from parent, because the ads are appear almost on every play, and the ads change very often hence very hard for kids to locate the close button, thus defeat the purpose of an app for kids. It made kids stress more than learn.”
- “Would be 5 stars but there are too many ads and no way to remove them. My kiddo absolutely loves the activities but they only last mere seconds before the ads start. And they aren't even ads geared towards kids and require reading to close out of them. It's absolutely ridiculous that in the review section you have been claiming to be fixing it for 2 years. I would gladly pay for an ad free version but until it exists I'll be uninstalling.”

It is not clear whether Google’s “careful vetting” of high quality Google Video Partners includes checking how the ad serving experience affects young children. It is also unclear whether Fortune 500 brands or advertisers expect their TrueView in-stream ads to serve on mobile apps targeted towards 2 year olds.

In 2020, the [Wall Street Journal \(WSJ\) reported that](#) “Google wants to substantially limit the information a key auditor of YouTube can share about the risks of advertising on the video service”. [WSJ wrote](#) that an auditor “is refusing to sign a contract that would prevent it from reporting to clients when ads have run in videos with sensitive subject matter, including [...] children's content.”

One media agency executive, who was shown an advanced copy of some of these research results, said:

“TrueView ads should not be present in any apps meant for kids. It represents an unnecessary risk for advertisers, particularly since those advertisers have little control over the placement of their ads. It is particularly concerning when ads meant for mature audiences, such as alcohol ads, are included in such apps.”



As mentioned before, YouTube does not allow independent 3rd party verification pixels in its ad campaigns. YouTube also does not provide impression level log file data to media buyers, unlike other advertising platforms such as the Trade Desk or MediaMath DSP.

During the course of this study, it was observed that thousands of TrueView in-stream ads had been served to the openly declared bot run by HTTP Archive. The HTTP Archive bot runs out of a Google Cloud data center server.

It is not clear why Google's systems were serving ads to a declared bot running out of a Google Cloud data center, or what percentage of brands' total TrueView ad budget was served to bots.

#### How is the data gathered?

The list of URLs is fed to our private instance of [WebPageTest](#) on the 1st of each month.

As of March 1 2016, the tests are performed on Chrome for desktop and emulated Android (on Chrome) for mobile.

The test agents are run from [Google Cloud regions](#) across the US. Each URL is loaded once with an empty cache ("first view") for normal metrics collection and again, in a clean browser profile, using [Lighthouse](#). The data is collected via a [HAR file](#). The HTTP Archive collects these HAR files, parses them, and populates various tables in [BigQuery](#).

Source: [HTTP Archive](#)

## Ads from numerous Fortune 500 and government advertisers may have served on invalid TrueView skippable in-stream environments

The list of affected brands observed throughout the course of study, whose TrueView skippable in-stream ads may have served on in-eligible muted, auto-playing, out-stream video slots, includes many Fortune 500 brands, the European Parliament, US federal, state, and municipal government entities, numerous non-profits like the Environmental Defense Fund (EDF), and political advertising campaigns for entities such as Senator Mike Lee of Utah (the sponsor of the AMERICA Act).

This list includes:



AIDA Cruises

AMCI : Advanced Micro Controls Inc.

ANWB Communicatie

AXA Deutschland

Accent Clothing

Adbaker

Adler Pharma

Adobe Creative Cloud

Adobe DE

Adobe Document Cloud

Adobe Document Cloud JP

Adobe UK

AdobeCreativeStation

AdriaCamps.com

Aeroméxico

Aflac

Air Caraïbes

Airbnb

Aktion Deutschland Hilft

Al Mustafa Welfare Trust

AllDentZahnzentrum

Allbirds

Alles Gold

Amaze

Amazon Music

Amazon.de

American Committee For The Weizmann Institute Of Science Inc

American Express Business

Amit Bhawani

Amundi

Ancestry Deutschland

Angel Soft

Anheuser-Busch InBev

Ankerkraut

Anxiety Specialists

Arena Stage

Argos

Arm & Hammer Laundry

Ascension Careers

Ashley



Athletic Greens

Atlantis Dubai

Atlassian

Atlassian Confluence

Audiio

AugustinusBader

Aurélien

AutoScout24

Autohaus NIX GmbH

Aveeno Canada (Johnson & Johnson owned)

Avoury. The Tea.

B&H Photo Video

BAMorg

BAUR Versand

BB Promotion GmbH

BBC Trailers

BDroppy

BMFSFJ

BMOCommunity

BTN Münzen - Deutsche Ausgabestelle



Bar-Bar-A Horse & Livestock Drinkers

BarDeluxe

Bartlett Tree Experts

Bayer Gesundheit

Bechtle AG

Beliani

Bellroy

Belstaff

Bereit zu Reisen DE

Best Buy

Big Scary Games

Bihl+Wiedemann GmbH

Billboard

Binance NFT

Blacklite District

Bloomberg Originals

Bluehost

Bluemotion 3D

Bob Diamond - America's Tax Sale Attorney

Booking.com



Bose

Brembo

Brilliant Earth

Briscoes New Zealand

Brooks Running France

BrytiagoTV

Burga

CAR-REP

CHERRISK

CIBC

CLEAN FITNESS

CLUSE

CMC Markets plc

COPA90 Football

CROWZ

Calgary Co-op

California Closets

California Science and Technology University

Calvin Klein

Cam Clark Ford TV



Capital.com

Carbify

Casinos Austria

Casper

Charles Tyrwhitt

Chase

ChevyChaseAcura

Chickfila

Chris Anderson

Chris M. Walker

Christoph Magnussen

Christopher Walker

CiscoGermany

ClearScore

ClickCease

Cloud Sangha

Coca-Cola Deutschland

Coffee Circle

Cointreau U.S.

Coloplast Italia



Comarch Finance

Comarch Large Enterprises

Commerzbank AG

Compose AI

Consumer Cellular

Coolblue Advertising

Corendon Airlines

Costa Rican Vacations

CrowdFarming

Culligan Water

DAZN

DICK'S Sporting Goods

DIJET EUROPE

Dafi

Dance Fruits

Danley's Garages

DataCamp

Debbie Graney

Debitam

Dedoles DE





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Dell Technologies Deutschland

Deutsche Glasfaser

Deutsche Grammophon - DG | Stories

Deutsches Rotes Kreuz e.V.

Dialpad

Dimary

Disney Plus CE

DocMorris

Domestika

Domino Printing UK

Doors2Floors

Doptelet® (avatrombopag)

Dot STORE Domains

Down East Gear

Dr. Squatch

Dropbox Sign

Drunk Elephant Skincare

Dungeon Alchemist

Duschmeister

Dyson



EVE Online

EY Germany Switzerland Austria

Ecover Deutschland

Edelmetallhandel Zeltmann e.K.

Eight Sleep

Elementor

Emirates

Empower

England & Wales Cricket Board

Enterprise

EnviroKlenz

Environmental Defense Fund

Epilog Laser

Ergotopia

ErstmalzuPenny

Espadrij

Etihad Airways

Europa-Park GmbH & Co Mack KG

European Flight Academy

European Parliament



Expedia

Expo 2020 Dubai

F-Secure

FINN

FREDERIQUE CONSTANT GENEVE

Fachhochschule Graubünden

Falcon's Resorts by Meliá

FatFace

Fever-Tree

Financial Times

Fire Follows

Firestone Tires

Fit!

Fiverr

Flanax

Flutterwave

Focus Entertainment

Ford Motor Company

FordCanada

Fortinet



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Fresco Dog Foods GmbH

Freshly Cosmetics

Fressnapf

Future Electronics

G-P

GLAMIRA

GMC Canada Offers

GOAT

GPS and TRACK LLC

GRIP6

GT's Living Foods

GUT Bebra

Game of Thrones Winter is Coming

Genesis USA

Germans OY

Get Schooled

Getir

Giovanni Raspini

Glico Japan江崎グリコ 公式

Go Türkiye



GoDaddy United Kingdom

GoPro

GoTo

Goodyear Deutschland

Google

Google Ads

Google Canada

Google Career Certificates

Google Chrome

Google Small Business

Google Workspace

Gotoトラベル

Grammarly

Green Petfood

Grubhub

Gryt Health

Guardio

Guild Wars 2

Gula Tech Adventures

Gvoke®



HSN

Hankook Tire Global

Hardcore Closer

Health Carousel

Health Mantra

Healthful Squad

Heather Itzla

Hello Seven

HelloFresh Deutschland, Österreich & Schweiz

Hero Wars

Hero Wars Web

HertzIT

Hochschule Furtwangen

Hogan

Hollister Co.

HomeToGo Deutschland

Honda Canada Inc.

Honda Outdoors NZ

Hotels.com

Hotjar



HyundaiUSA

HyundaiWorldwide

Háskólinn í Reykjavík - Reykjavik University

Hårklinikken

Hövding Sverige

IB-Freiwilligendienste

ICC

IG Deutschland

IKEA JAPAN

INNSiDE by Meliá

INTERSPORT Deutschland

IONOS Deutschland

IQAir

IkPas

Imagine Your Korea

ImmoScout24

Indeed

Inspire Uplift

Instacart

InterSystemsCorp



Interrail

Investing Outlook

Investor's Business Daily

Island Questaway Web

JDYS.W

JYSK TV spots

JalouCity

James Hardie

Jamones Ibéricos EU

Jeans Fritz

Jergens Skincare

Jimdo.de

Jobcase

John Reed Fitness Music Club

Johnnie Walker

Joyn Deutschland

Juan Cuenca Paris

Juice Technology

Juristu Incassodiensten

KAYAK





Ka'Chava

Khoros

Kinesis Money

KitchenAid

Kjær & Sommerfeldt

Klaviyo

Kobayashi Healthcare Europe

Kodiak Cakes

Koninklijke Gazelle Deutschland

Kruunukaluste

Kumho Tire Global

KÜHL

LIFE O.N.G.

LIFULL HOME'S

LOFT

LU Deutschland

La Chona

La Cie Canada Tire Inc.

Lacoste

Lacy Bra



Lavazza

League of Legends

LeagueApps

LeasingMarkt.de

Lecturio Germany

LeeforSenate

"Legacy Tax: ""Home of the Levy King"""

Lenovo Asia-Pacific: Commercial

Lenovo Deutschland, Österreich & Schweiz

Les Mills

Levi's®

Lexar

Lil Nuu Official

LinkedIn Ads

Little Big Change

Live Nation GSA

Live Nation Japan

Logel Homes

Logitech

Lotus Cars



Lumaly

Luvia Cosmetics

Luxbach GmbH

Löwenanteil

MGM

Mackinac Island Tourism Bureau

Macy's

Malt

Manhattan Mini Storage

Mannaseife

Maria Casino

Matratzen Concord

Mazda USA

McCain Deutschland

McDonald's Polska

Media Expert

MediaMarktSaturn

MediaWorld

Melio Payments

Meliá Hotels & Resorts



Mercedes-Benz Polska

Merck

Mercury Marine

Metricon Homes

Michaels Stores

Micro Focus is now OpenText

Midas

Midland Credit Ltd

Miele Deutschland

Miele USA

Mijndomein

Mikkelsen Twins - PublishingLife

Milgamma

Milka

Miro

Mohd Home Design

Monsido

Monte-Carlo SBM

Motatos

MyFundedFX



NCFE

NICE

NOVO

NVFCCommunications

NYC Mayor's Office

Namecheap

National Harbor

National Rail

Naturnah Möbel

Newark DE PD

Newman's Own

Nexcess

Next Level Racing

Nicotinell FI

Nike

Nike Football

Niqo Co.

Nissan Canada

Northwestern Mutual

Norton Deutschland



Nova Scotia

Nurtec ODT (rimegepant)

Nutrisystem

Nuubu Official

OCEANSAPART

OFFICE Partner GmbH

OFX

OLTORIGIN USA

OTTO

OfficialHillsPet

Okta

Olight Deutschland

Olight US Store

Omoda

OneBloodVideos

Onlinejobs.ph

Ooni

Oot Granola

Opdivo TrueView

Opera



Otto Wilde Grillers

Our Place

Overgear

Overwolf

OxiClean

PC Auto

PERGOLUX GmbH

PICO VR

PLYMKT

PXG

Palladium Hotel Group

Pancreatic Cancer Action Network

Paramount Plus DE

Parientesoficial

Passive Prospecting | YouTube For Real Estate

Patagonia

Paul Hogg

Paula's Choice Deutschland

Pavesi Italia

Peak Performance



Pepe Jeans London

Petco

Phantasialand

Philips

Picnic Careers

Pipe

Pipedrive

Pizza Hut Polska

Plaid

Plan International Canada

Planet Pilkey

PlatinumNatural

Pluto TV DE

PocketBook

PokerStars YouTube

Polaroid

Polizei NRW Karriere

Pragmatic Institute

Praxisinstitut Naturmedizin

President's Choice





Pure Michigan

Qantas

QuickBooks

QuikTripTV

Quill.com

Quitoque

R Λ Z ≡ R

R+V Versicherung

RAD Diversified

RBC

REWE

RIU Hotels & Resorts

ROOFLINK

RS Americas

RTL+

Rachel Notley

Raid North America

Rains

Ralph Lauren

Rapyd



RedWeek

Rentokil Nederland

Ring Deutschland

Rixos Hotels

Roborock

Rocket Mortgage

Rohe Energie

Rowan University

S&P Global Commodity Insights

SEGMÜLLER

SHOWTIME

SOTI

SPĪRŪAL

STADTSALAT

STARCAR Autovermietung

STL Tones

SUSHI BIKES

SUUMO / スーモ

SWISCO

Sage Appliances



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Samsung Polska

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Sanofi Mediathek

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Saxo Bank

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Schärdinger

Scottish Friendly

Scrapbook.com

Scy Jimm

Secret Escapes

Secretlab

Secrets Resorts & Spas

Seeking Alpha

Semrush

ServiceTitan

Side Star Hotels

Signal Booster



Skateistan

Skårebo

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Slido

Smart Earth Camelina Corp.

SnackMagic | SwagMagic

Sodii Hydration

SoundCloud

Southern Belle Vacation Rentals

Space Perspective

Spanflug

Speechelo

Square Canada

Square Enix DE

Squarespace

Stage Entertainment

Staples Canada

Stayz

StepStone.de

Sternglas

SubaruCanada

SumiAgroPoland

Sunweb Deutschland

Swappie

Sylt - Die Insel

Sysdig

THE FIRST TAKE

TOM FORD

TUI BLUE

TUI Cruises - Mein Schiff

TUI UK

Tactical Wargame

Talkiatry

Tamaris Spots

Taxfix

Team17

Tempur-Pedic

Tempur-Pedic CDN

Terminix

The Axel Leasing Office



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The Federalist Society

The Gnomon Workshop

The LEGO Group

The Mountain Collective

The North Face

The Rain - Official Music Channel

The Sims

The Tea Spot

The University of Central Lancashire

The Wall Street Journal

The Waterski Broadcasting Company

TheOfficialPandora

ThePlayWay

Thrive Beer

Time for Nature / Holzkern

Tod's

Tommy John

TopCC AG

Tower Insurance

Toyota Canada



Toyota USA

Trade Republic

Trane Technologies

TransIP

TravelEssence Deutschland

Trendyol

TriHonda

Tropicfeel

True Classic

Trulioo

TubeBuddy

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Twilio

UGG IN EUROPE

UYN

Ultra Mobile

Unbox Therapy

Under Armour

United Wholesale Mortgage

Universal Pictures Germany



University of Leicester

Urtopia — The Smartest E-Bike

VALORANT

Valley Vet Supply

VanEck Europe

Vanessa Larsson

Verkaufen bei Amazon - Deutschland

Verti Versicherung

Vestiaire Collective

Viaplay

Viaplay Sverige

Victoria's Secret

Viebrockhaus

Vimeo

Violife Foods

Virgin Voyages

Visit Abu Dhabi

Visit Cyprus

Visit Dubai

Visit Peru





VisitDenmark

VisitScotland

VistaPrint Canada

VitaminExpress

Viva Blog

Vivek Ramaswamy

VixPlus

Vodafone Deutschland

Volkswagen USA

Vrbo

W.B. Mason

WAGO

WHOOP

WITT WEIDEN

WP Engine

War Thunder

Warpath

Washington DC Area Honda Dealers

We Live Conscious

Webflow

Westland Whiskey

WetAndForget

Whoober

WinStar World Casino and Resort

Wirkaufendeinauto.de

Wix

Wix Deutsch

Wolters Kluwer Health

Wordtune

World of Warcraft FR

Wundertax - Steuern einfach für jeden

Wunschgutschein

XM Europe

Xero Accounting Software

YOOX

Yaamava' Resort & Casino

Yas Island Abu Dhabi

Yonc Onlineshop

YouTrack by JetBrains

YouTube



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Zendesk

Zoopla

adidas

autobiz donne une seconde vie à votre voiture !

auxmoney

benuta Teppiche & Wohnaccessoires

bigFM

cintas

comdirect

discovery plus

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dotSource GmbH

eBay Motors

eBayUKofficial

eToro

eToro France

eToroDE

easyCredit

easybill TV

emagine



flaconi

getgrover

hagebaumarkt

hagel-shop

iStock

idealo

idealofr

intimissimiofficial

jpmorgan

ledapshop.com

lexoffice

lululemon

momondo

momox fashion

motionvfx

nicko cruises

paypalde

quirion. Die digitale Geldanlage.

reMarkable

refurbed: Wie neu, nur besser

seaisland

smart

tangro software components gmbh

uOttawa Future

vhs-Ehrenamtsportal

visit japan

waterdrop

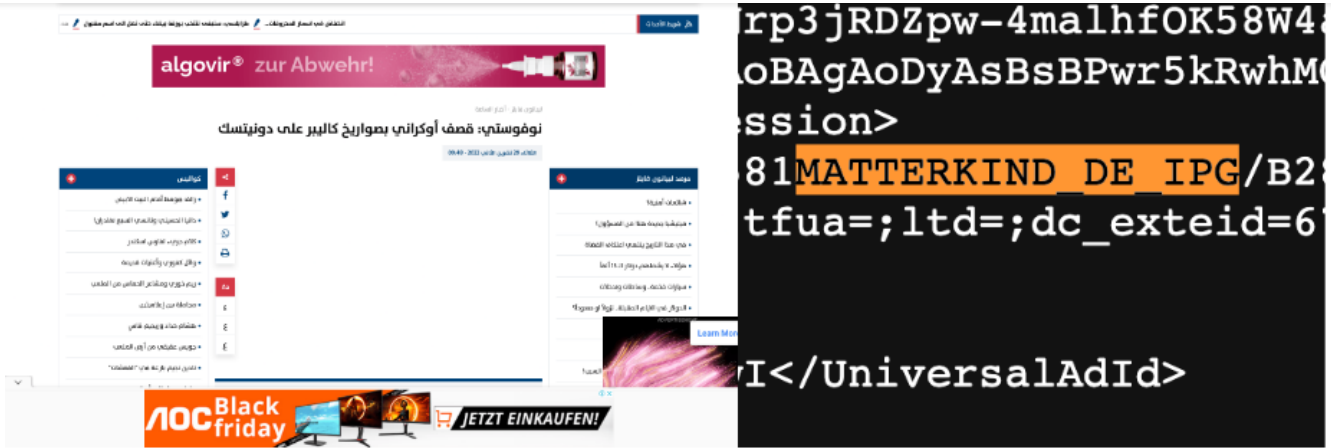
World of Warships EU

## **Ads from numerous major media agencies and agency holding company trading desks may have served on invalid TrueView skippable in-stream inventory**

During the course of this study, it was observed that, for some TrueView skippable in-stream ads, one can observe Campaign Manager 360 [tracking pixels](#) inside of the source code of TrueView VAST tags.

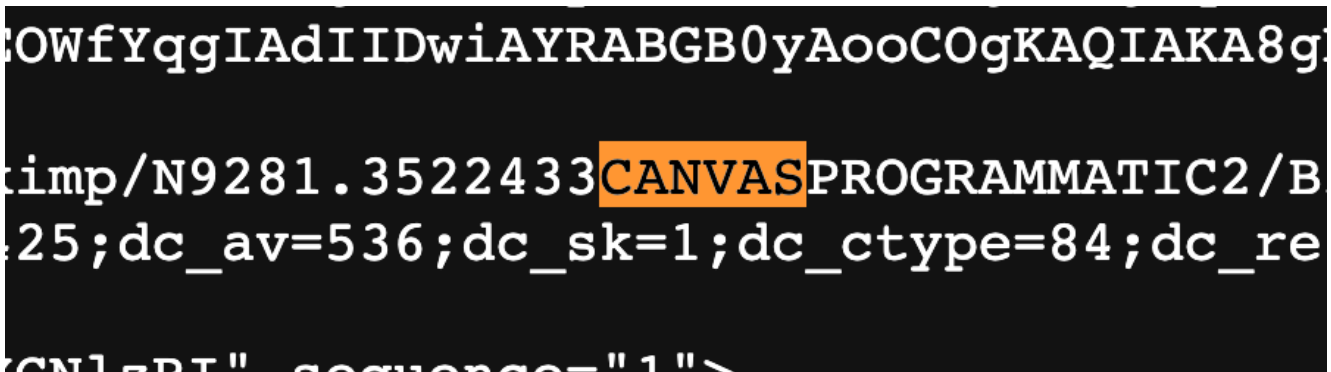
Some of these Campaign Manager 360 (CM360) tracking pixels delineate which media agency or entity operates a given CM360 account.

For example, on November 29th, 2022, a TrueView skippable in-stream ad for the brand Brembo automotive breaks [was served on](#) lebanonfiles.com to URLScan.io's bot, in a muted, auto-playing, partially hidden, out-stream video player. The [source code](#) of the Brembo vast ad tag shows the Impression tracker field was using a CM360 pixel for "MATTERKIND\_DE\_IPG". Matterkind is the agency trading desk for Interpublic Group.

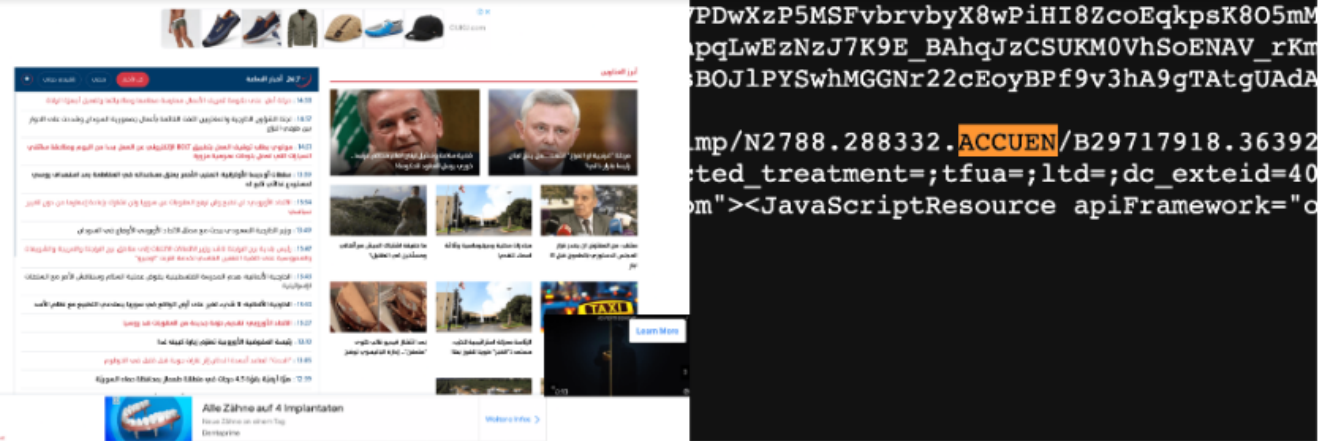


Source: [URLScan.io](https://urlscan.io)

As another example, [on September 9th, 2022](#), a TrueView ad for the Korean car brand Hyundai served in a muted, auto-playing, partially hidden out-stream video player on the Russian website [osnmedia.ru](https://osnmedia.ru), to [URLScan.io's bot](#). The source code of this Hyundai TrueView ad shows the impression tracker field was using a CM360 pixel for "CANVASPROGRAMMATIC2". Canvas WorldWide is a Los Angeles based media agency, which [lists](#) Hyundai as one of its clients.



On [May 8th, 2023](#), a TrueView skippable in-stream ad for Lotus Cars was served in an out-stream, muted video player on [lebanonfiles.com](https://lebanonfiles.com). The source of this Lotus Cars ad shows the impression tracker field was using a CM360 pixel for "ACCUEN". Accuen is Omnicom Media Group's programmatic agency.



The list of media agencies and media buying companies whose Campaign Manager 360 impression pixels appeared in muted, out-stream, auto-playing TrueView skippable in-stream ads included:

- Interpublic Group (Matterkind, Initiative)
  - Johnson & Johnson, Nike, Brembo, BMO bank, GoPro, Intuit
  - American Express (\*though American Express is an [IPG/Universal McCann](#) client, this brand had a different, brand specific CM360 impression pixel)
- Dentsu (Amnet)
  - General Motors, Sonos, Visit Scotland, Internorm International GmbH
- Publicis (Audience on Demand, Precision)
  - Kitchen Aid, Emirates airlines, Maytag
- Omnicom (Accuen)
  - Lotus Cars, Expo 2020 Dubai
- WPP (Xaxis, Headlight, Essence)
  - Ford, Peloton, Sainsburys, Argos



- 
- Bristol Myers Squibb, Goodyear Tire, O2
  - Jellyfish
    - Ugg
  - Brain Labs Digital
    - Financial Times (subscription campaign)
  - Horizon Media
    - Petco
  - Canvas Worldwide
    - Hyundai, Genesis
  - MiQ
    - Hollister

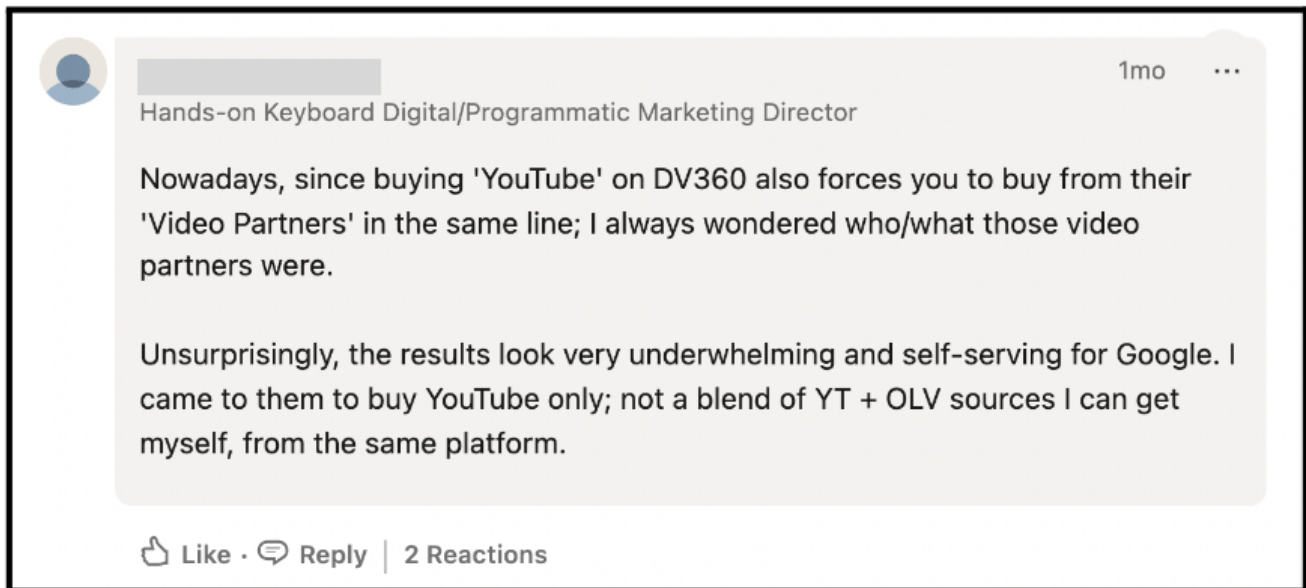
## **Surveyed marketers asserted that they consider mis-declared TrueView skippable in-stream inventory to be “ad fraud”**

After identifying instances of TrueView skippable in-stream ad placements that did not appear to be consistent with Google’s public online documentation about the ad format, Adalytics surveyed several dozen marketers and digital advertising professionals to better understand their perspectives on TrueView skippable in-stream ads. The goal of this convenience sample survey was to assess whether marketers' expectations about TrueView skippable in-stream ads aligned with the observed placements of various ads in this study.

The survey was also prompted by a [LinkedIn comment](#) from a Digital Marketing Director, who stated, “Nowadays, since buying 'YouTube' on DV360 also forces you to buy from their 'Video Partners' in the same line; I always wondered who/what those video partners were.



sources I can get myself, from the same platform.”



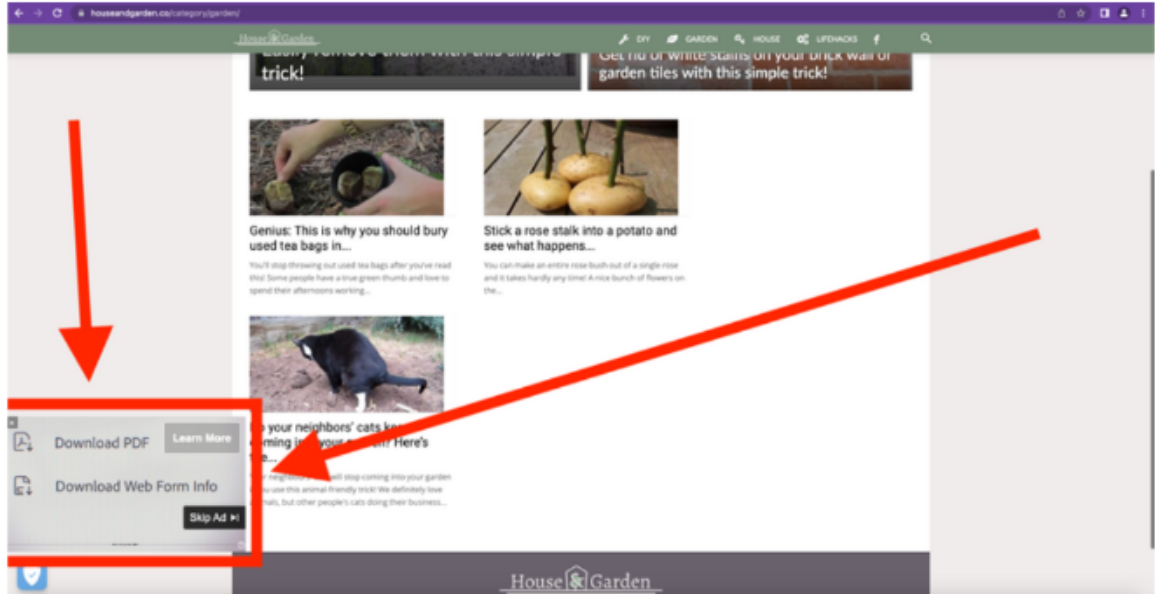
Screenshot of a [LinkedIn post comment](#) from a Digital Marketing Director

Media buyers were shown ten examples of real TrueView skippable in-stream placements, and asked whether they would consider these to be valid TrueView placements.

Sound: muted by default

Video: **auto-plays** without user input

TrueView ad: **Adobe.com** video ad in the lower left hand corner.



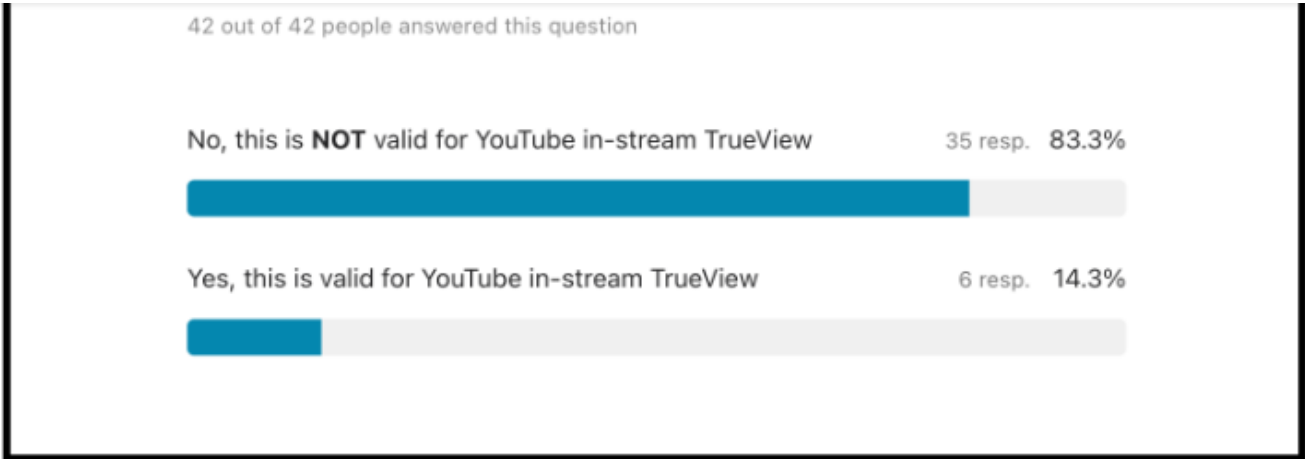
A Yes, this is valid for YouTube in-stream TrueView

B No, this is **NOT** valid for YouTube in-stream TrueView

[Add choice](#)

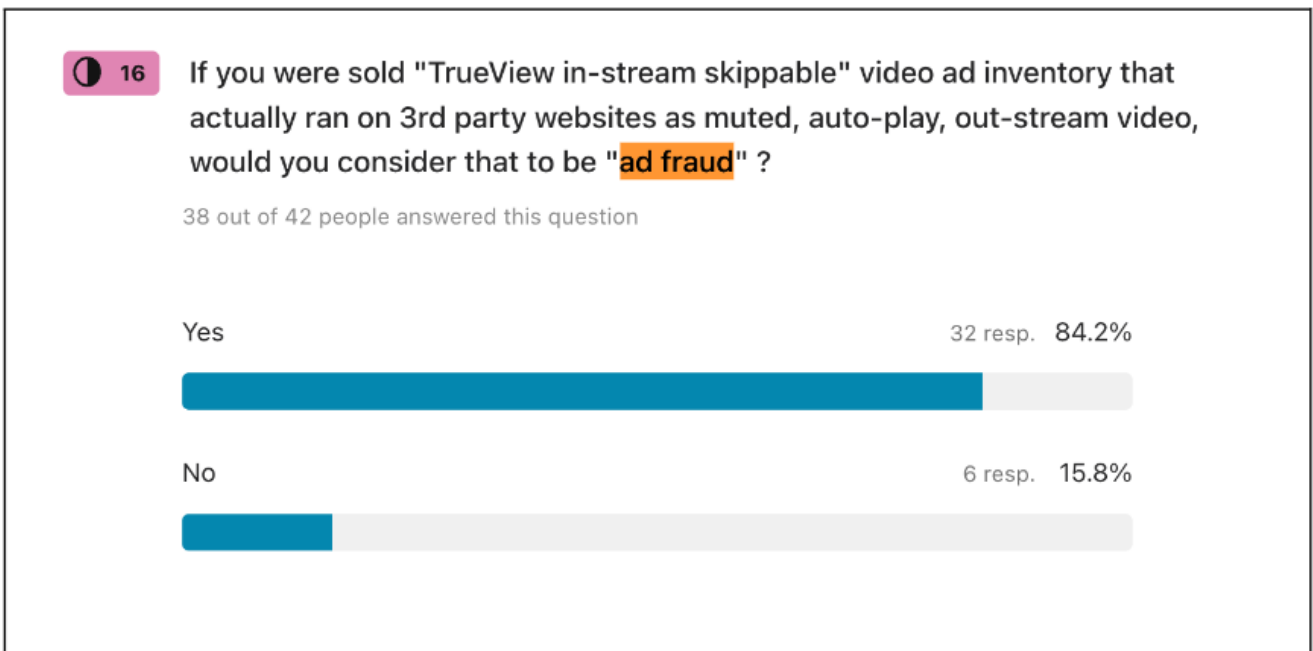
### Example survey question posed to media buyers

For all ten examples shown, a large majority of media buyers responded that: "No, this is NOT valid for YouTube in-stream TrueView".



### Example survey response

Furthermore, the media buyers were asked: "If you were sold "TrueView skippable in-stream" video ad inventory that actually ran on 3rd party websites as muted, auto-play, out-stream video, would you consider that to be "ad fraud" ?" 84% of surveyed media buyers responded "Yes" - suggesting that they would consider mis-declared TrueView skippable in-stream inventory to be "ad fraud".



When asked to explain their reason in free form text responses, some of the

described. It is not in stream - i.e. - it's not playing before/during/after content. Outstream, autoplay inventory would be worth much less than true instream video.”

- “It doesn't match the description of what is being sold.”
- “It is documented to be something other than what was received”
- “outstream ads are different then youtube trueview ads. They appear in sidebar, corners, or within editorial content.”
- “Per Google's definition it is required for TrueView Ads to be audible. If they are muted by default - this is a conflict of the understanding of how TrueView operates.”
- “its outstream not instream as purchased”
- “There is little chance the ad will actually have an opportunity to be effective”
- “If its muted, its not true-view”
- “The videos were clearly out-stream placements. They appear on sites with primarily written content (ie NOT video) and disconnected from the purpose of the websites.”

Furthermore, media buyers were asked:

“In your own words, how would you feel if Youtube was running large numbers of your ad campaign's YouTube TrueView in-stream video ads on: - 3rd party websites or apps, - with small, out-stream video players, - with sound off by default, - that were auto-playing with user involvement?”

The media buyers responded:

- “I would demand a refund of all impression and third party costs associated with buying those ads. I would also demand that youtube/google block buying of these placements by default.”



- “I would feel like I was ripped off.”
- “I would feel like the inventory was unreliable, and not worth paying for.”
- “Cheated out of my money.”
- “would feel screwed”
- “Fraud”
- “That inventory ran in a way that was not in line with how it was purchased.”
- “Pissed”
- “Would feel like its not a transparent investment”
- “Owed a massive credit”
- “I would feel cheated. I would feel like i wasn't getting what i paid for”
- “Betrayed and lied to”

Furthermore, a large majority of media buyers reported they would not buy TrueView skippable in-stream ads if they knew that a fair number of those video ads would serve in out-stream, muted, auto-play video players.

## Conclusion

### Caveats & limitations

Interpreting the results of this observational study requires nuance and caution. This study should not be construed as legal commentary or an opinion piece. This study does not allege that any entities knowingly or intentionally violated US Treasury sanctions or any other laws. This study did not make any extensive consultations with sanctions law or other legal



THIS study cannot make any confident assessments on how much money, if any, was disbursed to sanctioned or sanctions-linked entities. It is possible that even though ads were displayed on various websites, none of those ads involved money being exchanged between different accounts. Furthermore, it is possible that certain entities received exceptions, waivers, or clarifications from the Department of the Treasury.

Secondly, the authors of this study take no position on whether any forms of “fraud” were committed or observed. Any mentions of “fraud” are the opinions of media buyers or external entities who were surveyed during the course of this study. Furthermore, in the situations where apparently (from this study’s results) non-conforming ads were displayed, it is unclear whether Google billed for these services, offered credits, or otherwise attempted to correct for the anomalies observed.

This study makes use of empirical data and open source datasets, but ultimately the methodology represents only a sample of the entire YouTube and Google Ads ecosystems. As such, any numbers cited in this report must be construed as estimates, and may not be representative of the broader ad ecosystem.

Furthermore, this study focused primarily on TrueView skippable in-stream video ad campaigns which had not been opt-ed out of serving ads on the Google Video Partner network. In some (but not all) types of TrueView skippable in-stream ad campaigns, it is possible for a media buyer to choose to opt-out of having their ads served on the Google Video Partner network. If such configurations were selected, it is likely that a media buyers’ exposure to invalid muted, out-stream video inventory would be zero percent.

Lastly, the study is highly predicated upon Google’s publicly stated policies, which may change over time or have multiple definitions.

Adalytics welcomes outreach from Google, YouTube, or any other entities

## Discussion

This report analyzed data from participating advertisers and found that between 50-90% of advertisers' TrueView skippable in-stream budgets were served on Google Video Partner sites and apps, rather than YouTube proper. The majority of those sites and apps did not appear to be consistent with Google's published requirements for the TrueView skippable in-stream ad product. In some TrueView skippable in-stream campaigns, 42-75% of a brand's TrueView ad budget is spent on invalid GVP sites and apps, where the ads serve in muted, out-stream or otherwise ineligible ad slots.

Throughout the course of this study, TrueView skippable in-stream ads for many entities were observed serving in muted, out-stream, auto-playing, and/or hidden video slots. These included political campaign ads for Senator Mike Lee, the sponsor of the America Act, ads for the Canadian New Democratic Party, ads for US federal government agencies such as Medicare, and ads for many Fortune 500 brands.

Many media buyers consider the placement of these ads to be inconsistent with the TrueView in-stream standard, and a subset of media buyers reportedly consider this phenomenon to be a form of "ad fraud".

This report documented instances of TrueView ads serving on websites with tens of thousands of DMCA copyright violations, on websites discussing executions or children being murdered, on "made-for-advertising" sites, and on sites with no organic video media content. Furthermore, a significant amount of brands' ad budget was delivered on gaming apps that appear to be intended for young children.

Google's [public online documentation](#) states that "Google video partners are high-quality publisher websites and mobile apps where you can show your video ads to viewers beyond YouTube" and "Video partner publishers are carefully vetted and must meet Google's inventory quality standards" (emphasis added).

violating publishers were able to get past Google's careful vetting. If anyone at Google would like to further opine on Google's inventory quality standards, please reach out.

## Is "Google committed to complying with all applicable sanctions" ?

There have been at least four publicly documented instances where Google was observed serving ads, including those of Fortune 500 brands like Adidas, Citibank, and NBCUniversal, on websites or publisher environments that appeared to be under United States Treasury Office of Foreign Assets Control (OFAC) sanctions. In each case, a journalist notified Google of the alleged sanctions violations, and Google's spokesperson typically responded verbatim: "Google is committed to complying with all applicable sanctions".

1. In May 2021, Check My Ads Institute and Adweek found Google serving ads on OFAC sanctioned Russian intelligence disinformation outlets, [including FSB-controlled sites SouthFront and NewsFront](#), that worked to "covertly influence" U.S. election processes and institutions.
  - an anonymous Google spokesperson responded: "Google complies with all applicable sanctions and trade compliance laws", "If we find that an account violates these laws, we take appropriate action."
1. In April 2022, [Business Insider reported](#) "Google's adtech served ads on sites explicitly named on the US Treasury's official sanctions list". "Big companies such as Facebook, Citibank, and NBCUniversal may have unwittingly funded sanctioned businesses this way."
  - an anonymous Google spokesperson responded: "Google is committed to complying with all applicable sanctions and trade compliance laws", and "We've reviewed the sites in question and have taken appropriate enforcement action."
1. In July 2022, [ProPublica reported that](#) "Google Allowed a Sanctioned Russian Ad Company to Harvest User Data for Months"



and “We’ve reviewed the entities in question and have taken appropriate enforcement action”

1. In October 2022, [ProPublica reported that](#) “Google continued to place ads on a publication in Bosnia and Herzegovina for months after the U.S. government officially imposed sanctions on the site. Google stopped doing business with the site, which the [U.S. Treasury Department](#) described it as the “personal media station” of a prominent Bosnian Serb separatist politician, only after being contacted by ProPublica.”
  - Google spokesperson Michael Aciman responded: “Google is committed to complying with all applicable sanctions.”

The fact that TrueView in-stream ads were delivered on delisted or side-loaded Android apps developed by entities based in Iran, suggests the possibility that Google’s ad business may have inadvertently sent money from Fortune 500 brands and US advertisers to entities under US Treasury sanctions.

Other media buyers [reported](#) in a Reddit thread titled “Refusal by Google to remove fraudulent Apps from Display targeting” that they tried to exclude the potentially US sanctioned apps from their advertising campaigns, but Google’s software tools rendered “an error message saying they could not be removed from the campaign.” After the media buyers raised the issue to Google’s support teams, the Google Support team “could not remove these links from our targeting.” The Google Support personnel “found that there is no issue at our end”.

If Google is indeed committed to “complying with all applicable sanctions”, why does Google’s software and support teams refuse to honor media buyer’s wishes, who wish to avoid purchasing potentially sanctioned and/or fraudulent ad inventory?

Furthermore, is allowing media buyers’ ads, including TrueView in-stream ads, to serve on potentially fraudulent, US Treasury sanctioned apps -

## Is Google's TrueView ad delivery consistent with its Media Rating Council (MRC) accreditation for brand safety?

YouTube [received](#) "content-level brand safety accreditation" from the Media Rating Council.

It is not clear whether serving TrueView ads on potentially sanctioned, side-loaded Iranian apps is consistent with YouTube's MRC brand safety accreditation. It is not clear whether serving TrueView ads on Russian state sponsored propaganda sites or gaming apps meant for young children is consistent with YouTube's MRC brand safety accreditation.

Furthermore, it's not clear the degree to which the MRC audited YouTube's brand safety mechanisms for ads served on Google Video Partner sites (GVP), where up to 90% of a brand's TrueView ad budget may deliver against. The only mention of YouTube brand safety, MRC accreditation, and the Google Video Partner network can be found in a [May 2022 Adweek](#) article.

## Is TrueView ad delivery consistent with Google's TAG Brand Safety and Certified Against Fraud seal?

Google received TAG's [Certified Against Fraud](#) seal and [Brand Safety Certification](#), which requires that any participating company acting as a seller or intermediary must:

- disclose "staff and/or tools/technology used to review or flag content disclosing from media properties associated with piracy."
- "A participating company acting as a direct buyer, intermediary, vendor or seller should employ a TAG-recognised content taxonomy for harmful content" and "Digital advertisements may not be displayed in association with any content categories" such as "Online Piracy", "Sensitive Social Issues", "Death Injury or Military Conflict".
- "must employ pirate mobile app filtering for all advertising displayed in a mobile app environment."

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violations, sites discussing executions and childrens murders, and on potentially sanctioned foreign mobile apps which use “reverse engineering” to extract content from Instagram.

Given these observations, it is unclear whether Google’s serving of YouTube TrueView in-stream ads is consistent with its TAG Certified Against Fraud seal and TAG Brand Safety Certification.

### **Are the YouTube Measurement Program (YTMP) vendors providing true verification and measurement for TrueView ad buys?**

As mentioned before, YouTube does not allow independent 3rd party measurement vendor pixels to be served on its ads. Some sources speculate that the vendors that are part of the YouTube Measurement Program (YTMP) only receive aggregated reporting data about YouTube ad placements from YouTube itself, via server to server data delivery (the “[YouTube data feed](#)”). If these vendors are getting data from YouTube’s servers, rather than by independently measuring placements on phones, computers, and TVs, it is unclear the degree to which YTMP can independently check YouTube’s’ ad delivery.

Careful review of the marketing copy of several of the YTMP’s websites reveals only mentions of the word “channels”. There are no references to the Google Video Partner network, “apps”, or “websites” in the YTMP’s content. This begs the question - are the YTMP’s receiving any data on the 50-90% of advertisers’ TrueView budget that is serving against the GVP sites and apps?

In 2020, the [Wall Street Journal \(WSJ\)](#) reported that “Google wants to substantially limit the information a key auditor of YouTube can share about the risks of advertising on the video service”. [WSJ wrote](#) that an auditor “is refusing to sign a contract that would prevent it from reporting to clients when ads have run in videos with sensitive subject matter, including hate speech, adult content, children's content, profanity, violence and illegal

One senior media agency executive - when shown an advanced copy of this research report - stated:

“It shows that industry certified verification like the MRC and TAG has no credibility. 3rd Party Verification vendors are either incompetent or intentionally fraudulent and worse seem complicit with Google in a deliberate scheme to exploit advertisers and the industry via a deceptive “verified partner” program.”

### **Should the Google Video Partner network be opt-in rather than opt-out for TrueView in-stream ad buys?**

As discussed earlier, for certain types of TrueView campaigns, it is not possible for TrueView skippable in-stream media buyers to elect to opt-out of placing ads on the Google Video Partner (GVP) network. Furthermore, for virtually all skippable in-stream campaigns, the GVP network is automatically opted-in; media buyers must opt-out (if they are even given that option).

Given the concerns about potential US Treasury sanctions violations, copyright infringing publishers, muted out-stream video players, made for advertising sites, and significant numbers of foreign gaming apps for children, it is understandable why media buyers may be reluctant to purchase ads from the Google Video Partner network when their objective is to exclusively place ads on YouTube.

For certain brands who have high requirements for brand safety and compliance with US sanctions laws or childrens’ privacy laws, being forced to buy ads on the Google Video Partner network while executing a TrueView or skippable in-stream buy may preclude them from advertising on YouTube completely.



Nowadays, since buying 'YouTube' on DV360 also forces you to buy from their 'Video Partners' in the same line; I always wondered who/what those video partners were.

Unsurprisingly, the results look very underwhelming and self-serving for Google. I came to them to buy YouTube only; not a blend of YT + OLV sources I can get myself, from the same platform.

👍 Like · 💬 Reply | 2 Reactions

## Did Google transact large amounts of “invalid traffic”?

According to Google's [documentation](#) on the “Definition of invalid traffic”, “Invalid traffic includes any clicks or impressions that may artificially inflate an advertiser's costs or a publisher's earnings. Invalid traffic covers intentionally fraudulent traffic”.

Google's [online documentation](#) states that mis-declaring out-stream video ad slots as in-stream is a form of “invalid traffic.” However, this study noted many instances where TrueView skippable in-stream video ads appear to have been rendered on out-stream video ad slots.

Thus, these observations and Google's written attestations beg the question - did Google itself enable large amounts of “invalid traffic”, thus artificially inflating advertisers' costs?

As mentioned in the previous Results section of this report, one surveyed media buyer expressed his concerns about TrueView skippable in-stream inventory thusly:

“I would demand a refund of all impression [sic] and third party costs associated with buying those ads. I would also demand that youtube/google block buying of these placements by default.”

Adalytics shared an advanced copy of this report with Ebiquity, a major marketing and media consultancy which helps brands audit their ad buys.



findings and allegations represented within, I see this as a structural misrepresentation of advertising products at best, and downright fraudulent misleading practices at worst. If true, this will have major repercussions in the industry and lead to a significant negative impact on Google's perceived quality and reliability. Ebiquity works for over 75 of the top 100 brands, nearly all listed in this report as possibly being exposed, and we will initiate a large-scale review of this immediately. We thank Adalytics for their hard work in this and previous cases, and look forward to a detailed reply from Google."

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