

February 14, 2022

Ms. Susan Wojcicki
Chief Executive Officer
YouTube, Inc.
901 Cherry Avenue
San Bruno, CA 94066

Dear Ms. Wojcicki:

We write to express our serious concern that YouTube continues to host videos that instruct viewers on how to make and manufacture ghost guns. This content is a clear and direct violation of YouTube’s existing Community Guidelines on firearms, which provide that “[c]ontent intended to . . . instruct viewers on how to make firearms, ammunition, and certain accessories or instruct viewers on how to install those accessories is not allowed on YouTube.”¹ While we acknowledge and appreciate that YouTube has engaged with congressional staff about this problem and, in recent weeks, removed some of these videos, we are alarmed that an extensive amount of this dangerous content still exists on YouTube. It appears that the steps that YouTube has taken thus far are insufficient.

Ghost guns are unserialized firearms that anyone can get their hands on—without a background check—and put together themselves with a 3D-printer or a do-it-yourself gun-making kit purchased from an unlicensed seller. It costs as little as a few hundred dollars to get the tools and parts to construct a ghost gun, and, with help from YouTube tutorial videos, can take less than an hour to put together.

As a result, ghost guns have become the weapon of choice for gun traffickers and convicted felons as well as domestic violent extremists and foreign terrorists. Federal, state, and local law enforcement officials have sounded the alarm that these untraceable firearms present a distinct and deadly threat and have exacerbated the scourge and surge of gun violence that has ravaged communities all across the United States.

Notwithstanding your clear Community Guidelines, YouTube has allowed numerous videos that provide explicit instructions on how to construct ghost guns to remain available on its platform, sometimes for years. In December 2021, *NBC News*, citing a letter from Everytown for Gun Safety that documented 15 examples of violative videos,² reported that “dozens” of these videos

¹ *Firearms Policy*, YOUTUBE HELP (last visited Feb. 11, 2022), <https://support.google.com/youtube/answer/7667605?hl=en> [hereinafter YouTube Firearms Policy].

² Letter from Justin Wagner, Senior Director for Investigations, Everytown for Gun Safety Support Fund, to Susan Wojcicki, Chief Exec. Officer, YouTube (Dec. 6, 2021), available at <https://everytownsupportfund.org/documents/2021/12/youtube-ghost-guns-letter.pdf/>.

were still watchable on YouTube.³ These videos, which were posted between 2013 and 2021, drew more than 5.7 million total views. *NBC News* also found that some of these videos were uploaded to “the same channels as the ones YouTube [previously] took down.”⁴

During recent conversations with congressional staff about these videos, YouTube committed to addressing this issue and reviewing content on its platform to identify and remove videos that violated its Community Guidelines. While we appreciate that YouTube was willing to engage and that YouTube took some action to take down a number of videos determined to be in violation, this action was clearly not enough.

Following your review, it took one researcher less than 10 minutes to locate dozens of additional videos that violated the same Community Guidelines on YouTube’s platform. These videos—accounted for in the attached appendix—have been viewed, collectively, more than two million times. That view count continues to increase since these videos, as of February 11, 2022, remain on YouTube. In addition, using YouTube’s search feature and terms like “build pistol,” “polymer 80,” or “build 80,” would have returned dozens more examples. The titles of these videos alone—“How to build a p80” and “How to finish your 80% P320 insert”—should have been enough for YouTube to spot and take down these videos on its own.

That YouTube has Community Guidelines in place to prohibit content instructing viewers on how to make firearms is a welcome initiative, but these policies must be enforced—and enforced strongly—to make any difference. It cannot be the case that YouTube is entirely reactive, removing these kinds of videos only when news outlets call public attention to violative content, when gun violence prevention advocates send letters listing specific YouTube videos that violate its Community Guidelines, or when congressional staff reach out to raise concerns about such videos. YouTube owns and operates its service and bears responsibility for putting a safe product on the market. YouTube must be proactive and take affirmative steps on its own and expeditiously to enforce its Community Guidelines related to firearms.

Ghost guns pose a dangerous and deadly threat to communities across the country and make it more difficult for law enforcement to investigate those who exploit legal loopholes to get their hands on them. YouTube claims that “[t]he safety of our creators, viewers, and partners is our highest priority[.]”⁵ and your Community Guidelines make it clear that you agree that instructional videos on how to make ghost guns have no business being on YouTube’s platform. However, until YouTube devotes the time and resources necessary to actually enforce its Community Guidelines, the claim that safety is your highest priority rings hollow. YouTube can—and must—do more to ensure that the content it hosts does not exacerbate the threat of ghost guns.

In order to better understand YouTube’s handling of firearms-related content that violates your Community Guidelines, I ask that you provide written answers to the following questions no later than March 7, 2022.

³ Joshua Eaton, *YouTube Banned ‘Ghost Gun’ Videos. They’re Still Up.*, NBC NEWS (updated Jan. 24, 2022), <https://www.nbcnews.com/news/us-news/youtube-ghost-gun-videos-rcna7605>.

⁴ *Id.*

⁵ YouTube Firearms Policy, *supra* note 1.

1. Does YouTube acknowledge that its Community Guidelines related to firearms prohibit content that provides instructions to viewers on how to construct a ghost gun or 3D-print a firearm?
2. Following recent discussions with congressional staff, YouTube conducted a review to determine whether certain content hosted on its platform violated its Community Guidelines related to firearms. Please describe the steps undertaken and methods employed to perform this review.
3. How does YouTube monitor its platform and identify content that violates its Community Guidelines related to firearms before the content is reported by community members or other third-parties?
 - a. Does YouTube use machine-learning or other software and/or technology to monitor or prevent the posting or uploading of content that may or does, in fact, violate its Community Guidelines related to firearms?
 - i. If so, how many violations or potential violations of YouTube's Community Guidelines related to firearms were identified?
 1. How does this figure compare to violations of YouTube's Community Guidelines related to other prohibited content, including, but not limited to, child safety, suicide and self-harm, harassment and cyberbullying, and the sale of illegal or regulated goods or services?
4. What steps does YouTube take to prevent users who have repeatedly violated the firearms-related Community Guidelines from continuing to post or upload such prohibited content?
5. Once YouTube has determined that content violates its Community Guidelines related to firearms, does YouTube review other content on the same channel or posted by the same user to determine whether additional content violates its Community Guidelines?
6. Please describe the processes, factors, and/or standards YouTube uses to evaluate content reported by community members as potentially violative of its Community Guidelines related to firearms.
 - a. What is the average amount of time it takes for YouTube to make a determination on a community member's report of a violation of the Community Guidelines related to firearms?
 - b. What is the average amount of time it takes YouTube to remove the prohibited content if it determines that the reported content violates its Community Guidelines?
 - c. How does YouTube prevent prohibited content that is removed from being re-posted or re-uploaded to its platform?

- d. What teams or individual roles at YouTube are responsible for making determinations concerning violations of the Community Guidelines related to firearms?
7. Please provide any statistics YouTube maintains relating to—
- a. The number of videos flagged or otherwise identified as potentially violating its Community Guidelines on firearms, including the number specific to ghost guns.
 - b. The number of such videos determined to actually be in violation of its Community Guidelines on firearms, including the number specific to ghost guns.
 - c. The number of videos actually removed from YouTube’s platform, including the number specific to ghost guns.

Thank you for your time and for your consideration.

Sincerely,



RICHARD BLUMENTHAL
United States Senate



ROBERT MENENDEZ
United States Senate



CHRISTOPHER S. MURPHY
United States Senate



CORY A. BOOKER
United States Senate



EDWARD J. MARKEY
United States Senate

APPENDIX

As of February 11, 2022, at or around 10:00 AM (EST), the following videos instructing viewers on how to construct ghost guns remain on YouTube's platform.

Author	Views	Title
Diante Wiley	65,598	GHETTO RATCHET 80% LOWER BUILD NO DRILL PRESS
Flexooo	9,723	How to build a p80
Tactical Toolbox	948,657	Building a 2011 with EBAY Parts??
Maine	203,155	Polymer 80 PF940SC Completed Glock 26 build and shoot 80pbuilder Upper *Alot of malfunctions*
Tactical Toolbox	186,561	80% 1911 BUILD // START TO FINISH! BONUS Cleaning!
GlockStore	158,575	Pyramid Trigger Installation for Polymer80 Compact Lower
Mr BaGGs	121,214	Polymer 80 glock 26 build! Lets do it!!
1776 Supply Co	84,035	How to finish your 80% P320 insert
Pew Pew Tactical	59,155	Gucci Glock Made Easy! 😊 80% Arms GST-9 Full Kit! [Review]
The Rogue Banshee	48,215	P320 80% FRAME COMPLETION: How to build a custom P320 80% using the JSD Supply MUP1 Jig
Savage Guns	42,041	P80 g19 lower
Cool Hobby	31,399	Assembly GLOCK Polymer 80 G17 Pro Frame For KUBLAI P1 P1S /Tokyo marui/KSC
Andrew H	22,194	Polymer 80 Glock 19 Gen 3 Timelapse Build
Savage Guns	34,521	How to finish Polymer 80 Glock19 lower
Hunting & Guns 21	13,558	P80 Glock 26 pf940sc complete build #polymer80
DIY Polymer80 King	6,936	DIY 80% Freedom Wolf from Lone Wolf
P80 Ralph	12,942	How To Smooth Out Your Polymer 80 build for 100% cycling NO JAMS P80 Ralph
P80 Ralph	5,632	G43 Problems and Fixes P80 Build 9mm JSD
P80 Ralph	3,299	How to Install a P80 Slide Lock Spring Properly