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June 28, 2016

Peter Micek
Global Policy & Legal Counsel
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Dear Mr. Micek,

I am writing to respond to your June 1, 2016 [letter](#) to Google regarding our results in the Ranking Digital Rights Corporate Accountability Index. Google engaged with Ranking Digital Rights throughout the process and we are grateful for the Index's dedication and contribution to the global conversation about freedom of expression, privacy, transparency, and accountability in the ICT sector.

We were excited to be ranked first among the internet companies evaluated in 2015, and appreciate the constructive feedback and recommendations outlined in the final report. Since the report was issued, we have used the findings to guide internal discussions about how our practices and communications to the public can evolve.

Google cares deeply about free expression—not just because it's a key tenet of free societies, but also because more information generally means more choice, more power, more economic opportunity, and more freedom for people. As [Article 19](#) of the United Nations' Universal Declaration of Human Rights states, "Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive, and impart information and ideas through any media and regardless of frontiers."

We always start from the principle that more information is better, and that's why we've worked hard to be transparent about the removals we make. Google first launched the [Transparency Report](#) in 2010 to help the public learn about the scope of government requests for user data. With [revelations](#) about government surveillance, calls for companies to make encryption keys available to police, and a wide range of proposals, both in and out of the U.S., to expand surveillance powers throughout the world, the issues today are more complicated than ever.

Google respects the important role of the government in investigating and combating security threats, and we comply with valid legal process. At the same time, we'll fight on behalf of our users against unlawful requests for data or mass surveillance. We also work to make sure surveillance laws are transparent, principled, and reasonable. Recent additions to our transparency report include information about emergency disclosure requests, preservation requests, and, most recently, granularity about the national security demands that we receive going back to our first reporting period in 2009—now make these disclosures in ranges of 500 (e.g. 0-499) instead of ranges of 1,000. We are constantly evaluating and expanding the scope of our transparency reporting.

Moreover, Google is a founding member of the [Global Network Initiative \(GNI\)](#), a multi-stakeholder initiative that brings together ICT companies with civil society organizations, investors, and academics to take a common approach to freedom of expression and privacy online. It provides a framework for companies, rooted in international standards; ensures accountability of ICT sector companies through independent assessment; enables opportunities for policy engagement; and creates shared learning opportunities across stakeholder boundaries.

As part of our important commitment to GNI, we agreed that outside assessors would review how we're doing against [GNI's Principles on Freedom of Expression and Privacy](#). In the 2013 assessment, after reviewing specific cases on how Google is implementing the principles, the board found that Google was compliant and working to protect freedom of expression and privacy online, see [here](#). We expect the most recent assessment report to be released soon. The analysis and recommendations that come out of RDR's Corporate Accountability Index are complementary to the work of GNI.

Google is deeply committed to our responsibility to respect and protect the freedom of expression and privacy rights of our users. We welcome the opportunity to meet with you about the points you raised in your letter. Please direct further communications directly to me. I look forward to our continued collaboration on these issues.

Sincerely,

A handwritten signature in black ink that reads "A. Walden". The signature is written in a cursive, flowing style.

Alexandria Walden
Counsel, Free Expression & Human Rights