



770 Broadway  
New York, New York 10003  
USA

October 25, 2019

Peter Micek  
General Counsel  
Access Now  
P.O. Box 20429  
Greeley Square Station  
4 East 27th Street  
New York, NY 10001-9998

Dear Mr. Micek:

We appreciate Access Now's October 2, 2019 letter to Verizon Media offering reflections on this year's Ranking Digital Rights (RDR) Corporate Accountability Index. We have engaged for many years with the RDR team on the development of their Index. We appreciate the attention RDR brings to important issues at the intersection of human rights and technology and the acknowledgement in this year's Index of our efforts in this area, including the work led by our [Business & Human Rights Program](#) (BHRP).

Verizon Media is a media and technology company focused on creating high quality news and other original content to transform how people connect and stay informed. We are committed to putting our consumers first and we work to deliver on that commitment every day.

Our company's [Human Rights Statement](#) explains that we are committed to operating with respect for human rights across our business. This work is led by our BHRP, a decade-old program originally launched at Yahoo that continues to provide the foundation for our efforts to make responsible decisions in the area of human rights. Our BHRP takes a structured approach to integrate attention to universal rights, including internationally recognized principles of privacy and freedom of expression, in the decision-making processes that support our business operations.

In support of these efforts, we value our role as a founding member and Board member of the [Global Network Initiative](#) (GNI), a multi-stakeholder organization that works to protect and advance freedom of expression and privacy in the ICT sector. In March 2019, Verizon Media successfully completed its third independent GNI assessment, which reviewed our efforts to implement the GNI Principles on Freedom of Expression and Privacy. The multi-stakeholder GNI Board of Directors determined that Verizon Media is making good faith efforts to implement the GNI Principles with improvement over time.

RDR focuses on the importance of transparency to support human rights. We recognize that transparency is fundamental to putting consumers first. The RDR Index considered Verizon Media's disclosures in the form of policies and communications related to privacy and free expression. In particular, we [share](#) information about how we put our commitments into action and we have shared our [Global Principles for Responding to Government Requests](#). We also publish an annual [transparency](#)

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[report](#) with information on requests we receive from governments for user data and to remove content that we identify as coming from a government agency, whether pursuant to law or pursuant to our terms of service and community guidelines. We aim to contextualize these requests in our transparency report by providing illustrative examples.

RDR's Index has driven dialogue on how companies can communicate about their attention to these important issues and has emphasized accountability in the ICT sector. Each year we actively study, analyze and consider the results and findings of RDR and input we receive from experts in the human rights community on those results. We look forward to the opportunity for continued dialogue and partnership with interested stakeholders including Access Now.

Sincerely,

A handwritten signature in dark ink, reading "Nicole Karlebach". The script is cursive and fluid, with the first name "Nicole" and last name "Karlebach" clearly distinguishable.

Nicole Karlebach  
Global Head, Business & Human Rights