



September 16, 2024

Jeanne Shaheen  
United States Senator  
506 Hart Senate Office Building  
Washington, DC 20510

Rick Scott  
United States Senator  
110 Hart Senate Office Building  
Washington, DC 20510

Joe Manchin  
United States Senator  
306 Hart Senate Office Building  
Washington, DC 20510

Mazie K. Hirono  
United States Senator  
109 Hart Senate Office Building  
Washington, DC 20510

Margaret Wood Hassan  
United States Senator  
324 Hart Senate Office Building  
Washington, DC 20510

Catherine Cortez Masto  
United States Senator  
520 Hart Senate Office Building  
Washington, DC 20510

Ron Wyden  
United States Senator  
221 Dirksen Senate Office Building  
Washington, DC 20510

Angus S. King, Jr.  
United States Senator  
133 Hart Senate Office Building  
Washington, DC 20510

Richard Blumenthal  
United States Senator  
706 Hart Senate Office Building  
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Marsha Blackburn  
United States Senator  
357 Dirksen Senate Office Building  
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Robert P. Casey Jr.  
United States Senator  
393 Russell Senate Office Building  
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Marco Rubio  
United States Senator  
284 Russell Senate Office Building  
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Sherwood Brown  
United States Senator  
503 Hart Senate Office Building  
Washington, DC 20510

Charles E. Grassley  
United States Senator  
135 Hart Senate Office Building  
Washington, DC 20510

Dear Senators Shaheen, Manchin, Hassan, Wyden, Blumenthal, Casey, Brown, Scott, Hirono, Cortez Masto, King, Blackburn, Rubio, and Grassley,

Thank you for your letter and for your leadership in addressing the critical issue of non-consensual intimate imagery (NCII). As you note, this is a horrific form of abuse and one with



significant impacts for the victims, who are often women and girls. We share your commitment to ensuring that our technology serves to protect our users from illegal and harmful online content, such as NCII, which has long been used to shame, harass, and extort the person depicted.

Microsoft recently published a white paper on [Protecting the Public from Abusive AI-Generated Content](#). In the report, we detail Microsoft's approach to combating abusive AI-generated content, which necessarily includes safeguarding our services from abusive content and conduct, including NCII and child sexual abuse material. We also include policy recommendations and urge lawmakers to update non-consensual intimate imagery laws and to pass a new federal statute to address this harm.

Across Microsoft's consumer services, the Code of Conduct in the [Microsoft Services Agreement](#) governs what content and conduct is permitted, and we will take steps to enforce our [policies](#) against abusive content, including both synthetic and non-synthetic content that violates those policies, whether of adults, or apparent child sexual abuse material.

Microsoft's policy prohibits the sharing or creation of sexually intimate images of someone without their permission. This includes photorealistic NCII content that was created or altered using technology. We also do not allow NCII to be distributed on our services, nor do we allow any content that praises, supports, or requests NCII. Additionally, Microsoft does not allow any threats to share or publish NCII—also called intimate extortion. This includes asking for or threatening a person to get money, images, or other valuable things in exchange for not making the NCII public. We have a central portal to enable victims to [report](#) any instances of their imagery to us and have for several years provided [voluntary transparency reporting](#) about our approach. We will remove NCII from our hosted consumer services and Bing's search index, helping to reduce the impact to victims.

LinkedIn also has a robust trust and safety structure to address the non-consensual dissemination of intimate imagery. Understanding that its core function is as a professional network, LinkedIn's [Professional Community Policies](#) prohibit material depicting nudity or sexual activity. To maintain a safe and trusted experience and keep violative content off its platform, LinkedIn takes a multidimensional approach to protecting its ecosystem, including the use of AI to help proactively filter out inappropriate content. Because nudity is prohibited on LinkedIn, AI tools are used to help detect any instances of such content (regardless of its origin). As cited in its most recent [Transparency Report](#), LinkedIn has also enhanced its adult image detection defenses in private messaging to proactively prevent the sharing of nude imagery and sexually explicit content.

GitHub recently updated its [policies](#) on misinformation and disinformation to address abusive synthetic media. The [policy proposal](#) clarified that GitHub does not allow any synthetic and



manipulated media tools that are designed for the creation of NCII or any content that would constitute misinformation or disinformation.

However, we know that a platform-by-platform approach to NCII creates challenges for victims in effectively tackling the spread of their imagery and that the misuse of technology means this harm will continue to evolve. Addressing this harm effectively will require collaboration and a multistakeholder approach, leveraging the respective strengths of industry, civil society, and government.

This is why we were pleased to support StopNCII and host a meeting on this issue at our offices in New York in March 2024, at a time when critical stakeholders were gathered for the 68th session of the Commission on the Status of Women. We recognize the value of bringing stakeholders together, as well as the impetus for industry to continue to evolve and improve our approaches. On September 5, 2024, we released a [blogpost](#) providing an update on our approach to tackling intimate image abuse and announcing a new partnership with StopNCII that includes piloting use of StopNCII hashes in Bing to enable us to detect, and respond to, NCII content that appears in Bing's image search index. We have taken action on 268,899 images up to the end of August. We will continue to evaluate efforts to expand this partnership and will provide updates on our approach through our regular, voluntary Digital Safety Content Report.

We have welcomed recent passage in the Senate of legislation to address this harm and endorsed several bills in our recently published white paper, including the Stopping Harmful Image Exploitation and Limiting Distribution ("SHIELD") Act. We have also called on state lawmakers to ensure that their statutes are modernized to include the development of AI. On the funding side, we recognize that as the volume of cases involving NCII rises, so does the need to ensure that support services are readily available. Our white paper encourages Congress to provide more resources for organizations that provide these critical lifelines including through the Department of Justice Office of Victims of Crime (OVC).

Solving this critical issue will take a whole-of-society approach. We look forward to continuing to engage with critical stakeholders on this topic and, more generally, on measures to address the ongoing, global challenge of online harm against women and girls.

Sincerely,

A handwritten signature in black ink that reads "Frederick S. Humphries, Jr." in a cursive script.

Frederick S. Humphries, Jr.  
Corporate Vice President  
U.S. Government Affairs (USGA)