



**Response to Request for Comments on the  
Reviews and Endorsements ANPR, P214504**

**January 9, 2023**

The FTC's Advance Notice of Proposed Rulemaking ("ANPR") on the Use of Reviews and Endorsements focuses on an issue of critical importance to Google: combating fake reviews. We make reviews of products, services, and businesses available to our users on a variety of Google properties, such as Google Maps, Shopping, and the Play store. These may include first-party reviews posted directly by users on our services, and in some cases third-party reviews sourced or surfaced from merchants, aggregators, or partner platforms. In all contexts, we are committed to ensuring that the reviews displayed on our services are helpful to users and of a high quality. Fake reviews not only undermine the quality of information on our services, they also erode user trust and harm our relationships with businesses. This impacts our credibility and ultimately harms the short- and long-term health of our platform. We have every incentive to combat fake reviews, and we've invested substantial resources to do so.

We have strict policies in place that prohibit fake reviews, and we take violations of our policies very seriously. We use both automated systems and human operations to identify and block or remove content that violates our policies, including fake reviews. Our efforts to combat fake reviews have been effective, and we are committed to doing even more to address the problem. We are constantly working to innovate and improve our systems for identifying and addressing fake reviews, and, despite its challenges, we continue to invest heavily in this area.

Our comment below focuses on the actions Google has taken to identify and remove fake reviews from our platform. Part I explains Google's incentive to combat fake reviews, which, if not addressed, undermine Google's mission and user trust in our services. Part II discusses the measures that Google has developed and implemented to combat fake reviews. Part III addresses the effectiveness of these measures, Google's plans to continue investing in this area, and ways that the FTC can complement Google's efforts to help deter bad actors in the fight against fake reviews. Google appreciates the opportunity to comment on the FTC's ANPR on the Use of Reviews and Endorsements, and we look forward to participating in the Commission's rulemaking process moving forward.



## I. Google has the will and incentive to combat fake reviews

The ANPR states that “some platforms may have mixed incentives to deal effectively with the problematic reviews and, despite some platforms purporting to take enforcement of problematic reviews seriously, fake and deceptive reviews continue to flourish on those very platforms.”<sup>1</sup> The Chair, in her statement accompanying the ANPR, also suggested that “platforms that host reviews may also, in some instances, benefit indirectly from fake ratings and endorsements and have financial incentives to turn a blind eye to misconduct that brings in revenue.”<sup>2</sup> Respectfully, we disagree.

Google is incentivized to combat fake reviews. Google strives to be a place where users can access high-quality information about products, services, and businesses. User trust is a top priority for Google, and we are continuously working to make sure that the ratings and reviews shown on our platform are helpful and not being manipulated. Fake reviews diminish the quality of information on our services, which damages our credibility, undermines user trust, and harms our relationships with businesses and app developers.

Fake reviews undermine users’ confidence in the information available on our platform. When users don’t have confidence in the information available on our platform, they may decide to use other services to obtain information they would otherwise seek out on Google. This has an overall negative impact on user engagement with our services. The less users trust reviews, the less time they’ll spend reading them, the less frequently they’ll use Google services, and the less trust they’ll have in Google services.

In addition to undermining user trust, fake reviews frustrate our relationships with businesses and app developers. Google has a business incentive to have good relationships with businesses and app developers. This includes helping protect them from fake reviews targeting their businesses or apps (i.e., fake 1 star reviews) and fake reviews that boost their competitors’ businesses or apps (i.e., fake 5 star reviews of competitors). If we do not adequately address fake reviews, businesses and developers may not devote time into or otherwise want to have a presence on our platform.

Fake reviews can also trigger complaints from both users and businesses. Not only do fake reviews degrade these stakeholders’ experience with the platform, they also increase demand on our human and technical resources that must be mobilized to evaluate and

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<sup>1</sup> Trade Regulation Rule on the Use of Reviews and Endorsements, Advance Notice of Proposed Rulemaking, 87 Fed. Reg. 67424, 67425 (Nov. 8, 2022).

<sup>2</sup> *Id.* at 67428 (Statement of Chair Lina M. Khan).



address such complaints. The upshot is that Google is incentivized to identify and remove fake reviews and ensure that users are engaging with trustworthy and useful content on our services.

As explained further below, Google has made significant progress and continues to use advanced technology and human specialists to address fake reviews. However, it is worth taking a step back to take inventory of some of the macro issues that platforms face when moderating fake reviews. Spammers constantly evolve their tactics, meaning that distinguishing between fake and authentic reviews is an ongoing battle.<sup>3</sup> For example, in response to advances in our detection and mitigation capabilities, bad actors have adapted, such as by using Virtual Private Networks (VPNs) to evade routine detection. Businesses may also have strong incentives to buy positive reviews, which exacerbates the problem. In addition, Google does not always have full visibility into or control over certain types of reviews. As explained further below, many reviews displayed on our platform are sourced or surfaced from third parties, as users tend to leave reviews on the merchant's website where they purchased the product or service they're reviewing. Google integrates these reviews to provide consumers with a richer set of information to consider, and, as explained further below, we have controls in place to help ensure that these reviews are reliable. However, it can be more difficult to combat fake third-party reviews because with third-party reviews, we lack access to the same signals that we have access to for first-party reviews that help us identify inauthentic activity.

Google is constantly working to improve its systems to overcome these challenges, but we have to be judicious in striking the right balance in our moderation systems. There is immense consumer value in empowering people to share their experiences and knowledge with other people, but given the nature of the internet, there is no way to do so without risk of abuse. The key is to build in robust measures to detect abuse and react quickly to minimize its impact, and balance the need to address fake reviews with the risks of mistakenly denying good content. If platforms deny good content, there can be negative repercussions for the ecosystem more broadly. For example, mistakenly removing authentic reviews could affect businesses by impacting their overall rating. This, in turn, could impact consumers who may look to reviews to make decisions.

As fake reviewers become more sophisticated, Google is committed to continuing to innovate to identify and remove fake reviews. But this is not an incentives issue requiring

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<sup>3</sup> We discuss how we seek to overcome this challenge in Part II(B) below. Please note, however, that we generally refrain from providing too much detail about our methodology to ensure we are not giving bad actors a roadmap to avoid detection.



regulatory intervention at the platform level; rather, it is a complex issue requiring continued investment and regulatory enforcement against bad actors posting and selling fake reviews.

## **II. Google has done substantial work to combat fake reviews**

Google has done substantial work to combat fake reviews, including by implementing policies prohibiting fake reviews and developing and implementing systems to identify and remove fake reviews, often before users even see them.

### **A. We have strict policies in place that prohibit fake reviews**

We have strict policies in place that prohibit fake reviews on our platform, including first-party reviews posted by users on services like Google Maps and the Play store, and third-party reviews sourced or surfaced from merchants, aggregators, or partner platforms on services like Google Shopping.

For example, our Maps user-generated content (“UGC”) policy makes clear that reviews must be based on real experiences and information, and that deliberately fake or otherwise incorrect content violates our policy.<sup>4</sup> This policy links to supplemental educational materials that explain in detail what content is not allowed, including fake engagement, misinformation, misrepresentation, and other deceptive content.<sup>5</sup> The materials state that fake engagement is “content that does not represent a genuine experience”, including, for example: paying, incentivising or encouraging the posting of content that does not represent a genuine experience; discouraging or prohibiting negative reviews, or selectively soliciting positive reviews from customers; content that has been posted by a competitor to undermine a business’s or product’s reputation; and content that has been posted from multiple accounts to manipulate a rating.<sup>6</sup> For additional protection, we only allow users to submit reviews directly on Maps if they have created a valid Google account and accepted our Terms of Service, which require them to comply with all of our policies.<sup>7</sup>

Similarly, for the Play store, we have published policies on posting ratings and reviews for both users and developers. Our User Comment Posting Policy describes policies to be followed by users of the Play store who may want to post reviews for “anything [they’ve]

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<sup>4</sup> See Maps user-generated content policy, <https://support.google.com/contributionpolicy/answer/7422880?hl=en>.

<sup>5</sup> See Prohibited and restricted content, [https://support.google.com/contributionpolicy/answer/7400114?hl=en&ref\\_topic=7422769](https://support.google.com/contributionpolicy/answer/7400114?hl=en&ref_topic=7422769).

<sup>6</sup> *Id.*

<sup>7</sup> See Google Terms of Service (effective Jan. 5, 2022), <https://policies.google.com/terms?hl=en-US>.



purchased or rented from Google Play.”<sup>8</sup> This policy makes clear that reviewers must be honest, genuine, and unbiased, and that we expect reviews to reflect the experience the reviewer has had with the content or service they’re reviewing.<sup>9</sup> The policy also contains an entire section on spam and fake reviews that prohibits, among other things, posting fake or inaccurate reviews, posting the same review multiple times, posting reviews for the same content from multiple accounts, and posting reviews to mislead other users or manipulate a rating.<sup>10</sup> In addition, our Developer Policy prohibits developers from attempting to manipulate the placement of any apps on Google Play, including by repeatedly submitting ratings or inflating product ratings, reviews, or install counts by illegitimate means, such as fraudulent or incentivized installs, reviews and ratings.<sup>11</sup>

For Google Shopping, we rely heavily on third-party reviews sourced from merchants and aggregators who provide services to merchants. Each third-party source implements trust and safety measures, agrees to deliver content that meets published review guidelines,<sup>12</sup> and undergoes quality reviews during our onboarding process. Our published review guidelines include a number of requirements designed to minimize fake reviews and other abuse.<sup>13</sup> For example, to help ensure that reviews are coming from trustworthy sources, our product review guidelines generally require that review feeds be collected and owned by the retailers sharing them, or that they are otherwise shared through approved third-party aggregators.<sup>14</sup> In addition, these guidelines state that all reviews must follow Google’s content policies, which require that reviews are honestly solicited from customers who made a purchase, and are not from people claiming to be someone they are not.<sup>15</sup> Our merchant review guidelines also include requirements designed to minimize fake reviews and other manipulative conduct, such as by prohibiting merchants from removing or moderating their reviews, and requiring review providers to have a set of requirements for removing user reviews that are shared with Google.<sup>16</sup>

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<sup>8</sup> See Ratings & Review on the Play Store, <https://play.google.com/about/comment-posting-policy/>.

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> See User Ratings, Reviews, and Installs,

<https://play.google.com/about/storelisting-promotional/ratings-reviews-installs/>.

<sup>12</sup> See Product Ratings policies, <https://support.google.com/merchants/answer/6098512?hl=en>; Seller Rating Partner Requirements, <https://developers.google.com/merchant-review-feeds/publisherguideline>.

<sup>13</sup> See Product Ratings policies, <https://support.google.com/merchants/answer/6098512?hl=en>.

<sup>14</sup> *Id.*

<sup>15</sup> *Id.*

<sup>16</sup> See Seller Rating Partner Requirements,

<https://developers.google.com/merchant-review-feeds/publisherguideline>.



## **B. We use automated systems and human operators to monitor compliance with our policies and identify and remove fake reviews**

We use both automated systems and human operators to monitor compliance with our policies and identify and remove fake reviews from our platform. When we identify fake reviews or find scammers trying to mislead people on our platform, we take action to address the issue. For example, depending on the context, we may block or remove fake reviews, prevent users who repeatedly violate our policies from posting on our platform or suspend their accounts, place temporary restrictions on user reviews where necessary to investigate an attack, or even litigate in appropriate circumstances.

On Google Maps, we use technology to moderate online reviews both before and after they are posted. Before reviews on Google Maps are posted, our automated tools look at signals related to the account posting the review and the content of the review itself to identify fake reviews and remove them from the platform. For example, we check to see if users post duplicate content, and we remove reviews where we determine that they were posted by a bot. In addition, because we find that fake reviews often use similar patterns of wording, we also run reviews through intelligent text matching before they are posted to assist in identifying whether they are fake or misleading. After reviews on Google Maps are posted, our systems go back and check them at regular intervals to ensure they abide by our policies and to watch for questionable patterns. These regular checks take into account any new signal or information that indicates that a review is fake and misleading. When reviews are identified by these automated systems as not representing a genuine experience at a place or business (i.e., “fake engagement” as defined in our policies), they are automatically removed from Google’s properties and are no longer used to calculate the overall aggregate rating of the particular listing. We may also suspend or restrict user accounts, place temporary restrictions on user reviews, or even pursue litigation against scammers in appropriate circumstances.

We also have a number of specialist teams who work around the clock to manually assess reviews and accounts on Google Maps for violations of our policies, including for fake reviews. For example, we deploy trained operators and analysts to help us better evaluate content that could be difficult for algorithms to understand, such as reviews with local slang. The “human in the loop” enforcement process includes assessing certain reviews that are



flagged by our automated systems, as well as those that are flagged by users<sup>17</sup> and businesses<sup>18</sup> as being potentially fake and misleading.

Like on Google Maps, on Google Play, we use automated systems to combat fake reviews across our app ecosystem. Our automated systems look at aggregate review behavior, individual user review behavior, and the content of reviews to detect reviews that violate our policies. For example, if an app begins receiving a high volume of reviews compared to previous averages for the app, this will trigger additional checks to determine whether the engagement is organic. We check to see whether an individual user has submitted a large number of reviews in a short period of time, or has submitted duplicative reviews across different apps. We also assess the credibility of user behavior outside of the review process, including, for example, suspicious installation behavior and other patterns. We algorithmically filter out reviews that include foul, discriminatory, or otherwise offensive language. If our automated systems identify a review as being “fake engagement,” the review is removed from the Play store and is no longer included in the aggregate rating of the particular app.

Like we do for Maps, Google also has a number of specialist teams whose role it is to manually assess reviews and accounts for violations of Google’s policies on Play, including for fake reviews. We assess reviews that have been flagged by users through the Play store and developers through the Play developer’s console. Additionally, we have internal anomaly detection for suspicious activities that automatically get routed for manual review. Reviews that do not adhere to our policies will be removed.

For Google Shopping, we have automated content checks that focus on content quality, and we employ intermittent analyses aimed at identifying anomalous review contributions. Examples of what we might investigate further (if found by our systems or brought to our attention) include: bursts of 1 star or 5 star reviews; bursts of reviews for a specific entity; and an unusual number of reviews provided by a single user. We also deploy teams of trained operators and analysts who audit reviews and ratings.

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<sup>17</sup> Users have the ability to flag reviews as suspicious. In particular, users can flag reviews to be examined under Google’s policies. The Maps User Contributed Content Policy, available here: [https://support.google.com/contributionpolicy/answer/7445749?hl=en&ref\\_topic=7422769](https://support.google.com/contributionpolicy/answer/7445749?hl=en&ref_topic=7422769), includes instructions for how to flag suspicious reviews.

<sup>18</sup> Business owners may also flag reviews for Google’s review. They can use the same process as regular users to flag or fix inappropriate content in reviews. Business owners that have claimed their listing using Google Business Profile are also able to flag reviews for examination by logging into their Google Business Profile account and following instructions to flag reviews, as explained in the Google Business Profile Help Center here: <https://support.google.com/business/answer/4596773?hl=en>.





### **III. Our work to combat fake reviews has been effective, and we are committed to doing more to address this problem**

The measures we've implemented to identify and address fake reviews have been effective. For example, in 2022, we removed millions of reviews from Play that we determined to be fake, inorganic, or otherwise malicious. In 2021, users submitted around 1 billion Maps reviews and we blocked or removed more than 95 million of them for violating our policies. We also took down more than 1 million reviews that were reported directly to us. In addition, as a result of continued advancements in our machine learning, our technologies and teams disabled more than 1 million user accounts due to policy-violating activity. We are continually improving our systems to detect and remove the majority of fake reviews before users ever see them. In fact, our data shows that the amount of content seen by users on Maps that is fraudulent or abusive is less than 1% of all of the content viewed on Maps.<sup>19</sup>

The work we've done to combat fake reviews has been effective, and we are deeply committed to continuing the long-term work that needs to be done to address fake reviews. We are constantly innovating our detection systems to identify and combat new trends in promoting fake reviews. Engineers and analysts closely monitor and study suspicious activities in ratings and reviews, and improve our models' precision and recall on a regular basis. To provide some more concrete examples, for Maps and the Play store, we plan to further expand our machine learning-based detection systems to combat emerging developments around 5-star review spikes. For Maps, our 2023 plans also include continued investments in proactive risk intelligence to detect abuse trends, identifying coordinated activity using both supervised and unsupervised models, and applying abuse detection advancements to remove older fake reviews. And for Shopping, our emerging plans for 2023 include advancing capabilities through machine learning to further increase our ability to identify and take down fake reviews and associated accounts.

Google encourages the FTC to continue using its existing enforcement tools to pursue bad actors writing or selling fake reviews, and to codify in a rule that it is a violation of Section 5 of the FTC Act to write or sell a fake review. The FTC can use, and has used, its Section 5 authority to take action against bad actors perpetuating fake reviews. Although the FTC believes that its current remedial authority is limited,<sup>20</sup> the FTC can still obtain meaningful relief to deter these bad actors. The FTC can obtain strong injunctive relief for ongoing or imminent unlawful conduct, such as posting or selling fake reviews. In addition, even after the Supreme

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<sup>19</sup> See How we kept information on Maps reliable in 2021 (Mar. 24, 2022), <https://blog.google/products/maps/how-we-kept-maps-reliable-2021/>.

<sup>20</sup> See ANPR, 87 Fed. Reg. at 67425.





Court clarified that the FTC cannot obtain monetary relief under Section 13(b) of the FTC Act,<sup>21</sup> the FTC has managed to obtain substantial monetary relief in cases involving deceptive review practices.<sup>22</sup> The FTC has laid the groundwork to continue this trend by resurrecting its Penalty Offense Authority in the endorsement context.<sup>23</sup> And the FTC always has the option to seek monetary relief from bad actors engaging in “dishonest or fraudulent” conduct under Section 19 of the FTC Act.<sup>24</sup> That said, the FTC should codify that it is a violation of Section 5 to write or sell a fake review so that it may more easily seek civil penalties from violators and further deter bad actors. If deterrence is the FTC’s goal, then the FTC should be focused on the bad actors perpetuating fake reviews, not the platforms working hard to stop them.

#### **IV. Conclusion**

Google’s mission is to organize the world’s information and make it universally accessible and useful. We strive to give users access to helpful information about products, services, and businesses, and work hard to maintain their trust. Fake reviews undermine the quality of information on our services and erode user trust. Google has both the will and incentive to combat fake reviews. That is why we have dedicated substantial resources to identifying and removing fake reviews from our platform, and why we plan to continue investing in this area. Using its existing enforcement tools and codifying that it is a violation of Section 5 to write or sell a fake review, the FTC can complement the technological advancements that Google is making and help deter bad actors in the fight against fake reviews. Google appreciates the opportunity to comment on the FTC’s ANPR and provide its perspective on the FTC’s questions. We look forward to participating in the FTC’s process going forward.

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<sup>21</sup> See *AMG Capital Mgmt., LLC v. FTC*, 141 S. Ct. 1341 (2021).

<sup>22</sup> See *Fashion Nova LLC*, No. C-4759 (Mar. 18, 2022) (\$4.2 million settlement in case involving suppression of negative reviews).

<sup>23</sup> See *Penalty Offenses Concerning Endorsements*, <https://www.ftc.gov/enforcement/notices-penalty-offenses/penalty-offenses-concerning-endorsement> S.

<sup>24</sup> See 15 U.S.C. § 57b(a)(2).