

Tel: (212) 972-0300 Fax: (212) 972-2786 www.mediaratingcouncil.org

October 18, 2025

To: MRC Audited Digital Services

CC: MRC Digital Operating Committee

MRC Audit Firms

From: George Ivie, Anthony Torrieri, Ron Pinelli, Laris Oliveri, Shadi Hamdan, Hannah Bolcar

Re: Policy for Property-Level Ad Verification Representations

Policy for Property-Level Ad Verification Representations (Issued October 18, 2025):

MRC has developed and issued two Guidelines/Standards in coordination with the media/advertising industry that are important to note, and we conduct audits using these documents depending on what the vendor has voluntarily submitted to us.

The first is the Interactive Advertising Bureau's (IAB) Guidance for the Conduct of Ad Verification Guidelines authored in coordination with MRC in 2012:

IAB Ad Verification Guidelines

The Guidelines relate to Ad Verification processes (a service that is typically provided to an advertiser by a third-party vendor to ensure that the specifications of the advertiser's ad campaign are executed as intended with regard to areas such as context, geography, placement and competitive separation) using crawling or scraping of keywords and text as well as contextual classification based on language to categorize sites at the property (domain) level.

These Guidelines do not include requirements for measurement/classification of image, video or audio content, and provide no assurance associated with this (they also do not mention the word "safety" within them).

Separately, in 2018, given the complexity of digital media and the need for requirements and processes with more granular measurement of Brand Safety, MRC authored a Supplement to the IAB Ad Verification Guidelines titled "Enhanced Content Level Context and Brand Safety" adding new requirements for new safety-related service lines and a new accreditation category to analyze images, videos and audio at a URL level:

MRC Enhanced Content Level Context and Brand Safety Supplement

In this document, MRC makes clear the distinction between the two service lines and

accreditation categories:

"It is important to note when considering the various aspects of Context and Brand Safety in this Supplement that different buyers may not only have different targets and avoidance categories, but also different tolerance levels for risk depending on brand suitability. Ultimately, ad verification organizations seeking content level accreditation must provide consistent and discrete reporting to users in order to enable customized targeting and avoidance and to allow users to stipulate which levels meet the needs of a particular campaign or brand.

With the issuance of this guidance, to the extent applicable, MRC's accreditation considerations of Context and Brand Safety ad verification functions will be applied at the discrete domain, site or URL (property) level and content level for both display and video for both measurement and reporting granularity. Domain, site or URL (and even mobile application) level ad verification functionality and reporting should continue to follow the guidance in the original 2012 IAB/MRC Ad Verification Guidelines, but content level ad verification functionality and reporting should apply those guidelines as well as the guidance within this Supplement.

...

Further, ad verification organizations must clearly disclose specific capabilities and limitations and MRC's accreditation considerations and decisions related to Context and Brand Safety ad verification functions will be made with respect to specific capabilities. It is permissible for ad verification organizations with content measurement granularity to report avoidance and verification at the property level with proper disclosure. Such property level reporting with content level measurement granularity will be distinguished by MRC from property level reporting without discrete corresponding content measurement."

MRC audits entities for Property-Level Ad Verification based on text and keywords as well as contextual classification based on language and separately, Content-Level Brand Safety inclusive of images, video and audio in addition to text considerations. MRC differentiates these service lines and accreditation categories publicly on our website and within accreditation letters posted to our site as well as distributed to services.

Action Necessary to Clarify Standards Use

Still, MRC acknowledges there is confusion in the marketplace about the meaning and scope of the accreditations related to the two Guidelines/Standards we have referenced above, and that despite MRC's efforts to clarify otherwise, Property-Level Ad Verification without content-level measurement capabilities is often positioned in the marketplace as "Brand Safety" or directly as part of service and metric names. Again, it should be noted that the IAB Ad Verification Guidelines contain no reference to "safety" and this is a distinct service line from Content Level Brand Safety. The below action items have been proposed to MRC's Executive Committee, Digital Operating Committee and Board of Directors, who have agreed to support this policy.

MRC is continually self-reflecting on how we can improve the media industry and our service to it, as well as to try to stay ahead of developing issues. We often do this through new and

updated Guidelines and Standards available for voluntary audit and compliance to push the industry forward.

As stated above, one such example of this was when, in 2018, MRC produced a rigorous Supplement to the Ad Verification Guidelines (the "Enhanced Content Level Context and Brand Safety") with requirements for URL level and Content-Level measurement and reporting for Brand Safety and Suitability. To date, few organizations have voluntarily developed these capabilities and submitted for audit against them and even fewer have achieved accreditation related to them.

MRC's position is that development of URL, content-level measurement and reporting in compliance with the MRC Enhanced Content Level Context and Brand Safety Supplement based on the content of pages and apps (text, images, video and audio) is the only accredited service that should be represented as providing Brand Safety or making claims of content-level granularity.

MRC Policy Going Forward (Subject to a 6-Month Grace Period)

As such, by policy adopted by our Board of Directors and subject to a 6-month grace period for adoption effective with the date of this letter:

1. Ad Verification vendors accredited for Property-Level Ad Verification based on text or keywords as well as contextual classification based on language are not permitted to position these services as "Brand Safety" or represent them as content-level without content-level capabilities for the specific environment. This includes service and metric names or definitions, client and marketing materials and external releases as well as accompanying methodological and reporting disclosures. Only vendors accredited for Content-Level Brand Safety against the Enhanced Content Level Context and Brand Safety Supplement with content-level capabilities for the specific environment will be permitted to invoke the term Brand Safety or represent content-level measurement related to these services.

After the 6-month grace period, MRC will no longer continue accreditation of any vendor that positions Property-Level Ad Verification based on text or keywords as well as contextual classification based on language as Brand Safety or content-level measurement in any way until these references are removed or altered in compliance with this policy. Suitability language continues to be allowed for Property-Level Ad Verification with the appropriate disclosures and disclaimers discussed in this policy related to the basis of measurement.

2. Content-Level Brand Safety requirements and separate MRC efforts related to variability, sampling and non-sampling error already have strong requirements for disclosures regarding limitations of Ad Verification approaches (such as sampling and error disclosures). While we believe our current requirements in these areas are robust, all vendors accredited for Property-Level Ad Verification based on text or keywords as well as contextual classification based on language will clearly disclose to users within methodological disclosures and reporting:

- a. The fact that images, video and audio are excluded from measurement and consideration with direct disclaimer that this does not provide content-level Brand Safety measurement or assurance. This should include explanation of the limitations of Ad Verification approaches.
- b. That the Ad Verification Service represents Page, Site, App or Property-Level Ad Verification only as well as reporting of when unclassified URLs or subdomains are "rolled up" to or assume domain level classifications.
- c. Time to Live (TTL) policies and crawl rates including known limitations.
- d. Sampling and Non-Sampling Error associated to Ad Verification classifications.
- e. Use of App Store details (ratings, reviews or descriptions) for classifications including known limitations.
- 3. We continue to strongly encourage vendors submitting Property-Level Ad Verification based on keywords and text as well as contextual classification based on language to develop and voluntarily submit Content-Level Brand Safety capabilities for images, video and audio where possible. We are not willing to consider new submissions for previously unaccredited services for Property-Level Ad Verification without firm commitments to develop Content-Level Brand Safety capabilities for images, video and audio and submit these to audit where possible. All Ad Verifications organizations that have developed true Content-Level Brand Safety products or services will be asked to voluntarily submit them for audit as soon as is possible or feasible and should clearly distinguish the basis and capabilities of these products and services in disclosures and reporting.
- 4. We will also discuss with our Board whether there is reason or appetite to require Content-Level Brand Safety capabilities including image, video and audio, as well as compliance with the MRC Enhanced Content Level Context and Brand Safety Supplement as **nonoptional** for compliance with the IAB Guidance for the Conduct of Ad Verification Guidelines via a formal update. It should be noted that our Standards and Guidelines updates involve industry and member input including consensus and public review as well as a grace period for audited services. As a result, a timeframe for completion of this is currently indeterminate, but we will initiate these discussions with our Board.

Please contact the MRC Staff with any questions you may have regarding this policy at staff@mediaratingcouncil.org.