

Your response

Question	Your response
Question 1: How do you measure the number of users on your service?	LinkedIn measures the number of users of its service in a variety of ways. For example, LinkedIn measures total net members (registered members adjusted for inactive, restricted and duplicate accounts) and ac- tive users, which is a measure of how many unique members have logged in and viewed a page on the platform over a given period.
Question 2: If your service comprises a part on which user-generated con- tent is present and a part on which such content is not present, are you able to distinguish between users of these different parts of the service? If so, how do you make that distinction (including over a given period of time)?	LinkedIn is able to identify where users engage across its platform including areas where user-generated content is not present. That said, LinkedIn's user ex- perience and entry point is through the Feed which makes up the majority of time spent by users world- wide on LinkedIn's platform.
 Question 3: Do you measure different segments of users on your service? Do you segment user measurement by different parts of your service? For example, by 	LinkedIn is able to segment user measurement (1) by dif- ferent parts of our service, including by product or by website vs. app, and (2) for logged-in user activity into certain distinct types of users (e.g., active users).
 vebsite vs app, by product, business unit. Do you segment user measurement into different types of users? For example: creators, accounts holders, active users. How much flexibility does your user measurement system have to define new or custom segments? 	Although LinkedIn's user measurement systems allow some flexibility to define new or custom segments, given the manner in which LinkedIn measures guest user traf- fic, please note that LinkedIn is not able to provide as many metrics regarding logged-out site visits and is una- ble to fully deduplicate those logged-out user metrics which it can produce. That said, recent data shows that a majority of site visits to LinkedIn's services by UK-based logged-out users result in the user being shown material that contains limited to no user generated content.

Question	Your response
Question 4: Do you publish any infor- mation about the number of users on your service?	General information regarding the total number of LinkedIn members and the number of countries and ter- ritories in which those members are located is published on our website (https://about.linkedin.com). LinkedIn also occasionally publishes through its platform infor- mation about the approximate number of UK-based members.
Question 5: Do you contribute any user number data to external sources/databases, or help industry measurements systems by tagging or sharing user measurement data? If not, what prevents you from doing so?	LinkedIn generally does not engage in such activity be- cause its user metrics are considered LinkedIn's sensi- tive, confidential commercial information.
 Question 6: Do you have evidence of functionalities that may affect how easily, quickly and widely content is disseminated on U2U services? Are there particular functionalities that enable content to be disseminated easily on U2U services? Are there particular functionalities that enable content to be disseminated quickly on U2U services? Are there particular functionalities that enable content to be disseminated quickly on U2U services? Are there particular functionalities that enable content to be disseminated quickly on U2U services? Are there particular functionalities that enable content to be disseminated widely on U2U services? Are there particular functionalities that prevent content from being easily, quickly and widely disseminated on U2U services? 	The extent to which a user is presented with content shared by individuals other than the user's confirmed connections on a particular service can impact how eas- ily, quickly and widely content can be disseminated on the service. For example, LinkedIn members can quickly post a wide variety of content. This content may be made visible to the member's connections; however, in order for that content to receive quick and wide distribution, it gener- ally must receive engagement in the form of likes, com- ments, and reshares. Since LinkedIn is a real-identity pro- fessional network where members come for economic opportunity, such engagement generally is received only by professional content that is helpful to our members. Examples of such content can be found at <u>Tips for writ- ing articles on LinkedIn LinkedIn Help.</u> In order to main- tain a professional atmosphere, LinkedIn's Professional Community Policies prohibit many types of content. Au- tomated and manual defences ensure that such content is removed from LinkedIn.

Question	Your response
Question 7: Do you have evidence re- lating to the relationship between user numbers, functionalities and how easily, quickly and widely con- tent is disseminated on U2U services?	LinkedIn does not have evidence which demonstrates that user numbers are related to how easily, quickly, and widely content is disseminated on LinkedIn. As noted in response to question 6 above, the quality of the content is what determines how easily, quickly, and widely it is disseminated on LinkedIn.
Question 8: Do you have evidence of other objective and measurable fac- tors or characteristics that may be relevant to category 1 threshold con- ditions?	In determining how a platform should be categorized, it is important to note that a service's risk profile can be shaped significantly by certain platform characteristics, including the platform's purpose, target audience, and whether the service requires users to log in and operate under their real identity to engage with others and share content. Accordingly, these characteristics could render a service with a large user base relatively lower risk.
	For example, LinkedIn is a real-identity, specific-purpose platform, designed specifically for professionals. It is a networking tool that enables members to establish their professional identities online, connect with other profes- sionals, and build meaningful relationships for the pur- pose of collaborating, learning, and staying informed about industry information and trends. As such, the de- sign and function of the platform are central to its over- all risk profile related to systemic risks, and shape that risk profile in a few key ways:
	 LinkedIn is a real identity platform, where members must use their real or preferred professional name, and the content they post is visible to the member's colleagues, employers, potential future employers, and business partners. Given this audience, members by and large tend to limit their activity to professional areas of interest and expect the content they see to be professional in nature. LinkedIn operates under standards of professionalism, which are reflected in both content policies and enforcement, as well as in content prioritization and amplification. LinkedIn's policies bolster a safe, trusted, and professional platform, and LinkedIn strictly enforces them. LinkedIn strives to broadly distribute high-quality content that advances professional conversations on the platform.

Question	Your response
	 LinkedIn services are tailored toward profession- als and businesses. The majority of advertise- ments are business-to-business rather than busi- ness-to-consumer. Members must attest to be- ing over the minimum age to apply for an ac- count.
	These factors significantly reduce the likelihood of cer- tain systemic risks stemming from LinkedIn's platform and services, including the dissemination of illegal and harmful content.
 Question 9: Do you have evidence of factors that may affect how content that is illegal or harmful to children is disseminated on U2U services? Are there particular functionalities that play a key role in enabling content that is illegal or harmful to children to be disseminated on U2U services? Do you have evidence relating to the relationship between user numbers, functionalities and how content that is illegal or harmful to children is disseminated on U2U services? 	As noted above, LinkedIn does not have evidence which demonstrates that user numbers are related to how eas- ily, quickly, and widely content that is illegal or harmful to children is disseminated on LinkedIn. By contrast, plat- form characteristics (such as a platform's purpose, target audience, age requirements, and the scope of the con- tent prohibited by a platform's policies) can substantially impact the likelihood that such content will be dissemi- nated on the platform and whether children are likely to view it. For example, given its entirely professional purpose, LinkedIn is not popular with children. LinkedIn simply does not have content interesting and appealing to chil- dren. Moreover, LinkedIn terms of service prohibit any- one under the age of 16 from having a LinkedIn account and, if LinkedIn becomes aware that a member is under the age of 16, it will close the member's account. Additionally, given LinkedIn's professional focus, its poli- cies prohibit not only illegal content but a range of ma- ture content that is not consistent with that purpose. LinkedIn enforces such policies to keep its platform safe trusted and professional, reducing the likelihood that content which is harmful to children will be disseminated through LinkedIn and exposed to its users of all ages.
Question 10: Do you have evidence of other objective and measurable char- acteristics that may be relevant to category 2B threshold conditions?	Please see the response to Question 8 above.

Question	Your response
Question 11: Do you have evidence of matters that affect the prevalence of content that (once the Bill takes ef- fect) will count as search content that is illegal or harmful to children on particular search services or types of search service? For example, preva- lence could refer to the proportion of content surfaced against each search term 16 that is illegal or harmful to children, but we welcome sugges- tions on additional definitions. • Do you have evidence relat- ing to the measurement of the prevalence of content that is illegal or harmful to children on search services?	Not applicable, as LinkedIn is not a search service.
Question 12: Do you have evidence relating to the number of users on search services and the level of risk of harm to individuals from search con- tent that is illegal or harmful to chil- dren?	Not applicable, as LinkedIn is not a search service.
• Do you have evidence regard- ing the relationship between user numbers on search ser- vices and the prevalence of search content that is illegal or harmful to children?	
Question 13: Do you have evidence of other objective and measurable char- acteristics that may be relevant to category 2A threshold conditions?	Not applicable, as LinkedIn is not a search service.

Please complete this form in full and return to <u>os-cfe@ofcom.org.uk</u>.