

Ms. Jane Horvath
Senior Director of Global Privacy, Apple
Email: jane_horvath@apple.com
August 9, 2021

Dear Ms. Horvath,

The Citizen Lab, an interdisciplinary laboratory based at the Munk School of Global Affairs & Public Policy, University of Toronto, is currently researching censorship in Apple product engravings across different regions. We summarize our findings as follows:

- We analyzed Apple’s filtering of product engravings in six regions (mainland China, Hong Kong, Taiwan, Japan, Canada, United States), discovering 1,105 keyword filtering rules used to moderate their content.
- Across all six regions we analyzed, we found that Apple’s content moderation practices pertaining to derogatory, racist, or sexual content are inconsistently applied and that Apple’s public-facing documents failed to explain how it derives their keyword lists.
- Within mainland China, we found that Apple censors political content including broad references to Chinese leadership and China’s political system, names of dissidents and independent news organizations, and general terms relating to religions, democracy, and human rights.
- We found that part of Apple’s mainland China political censorship bleeds into both Hong Kong and Taiwan. Much of this censorship exceeds Apple’s legal obligations in Hong Kong, and we are aware of no legal justification for the political censorship of content in Taiwan.
- We present evidence that Apple does not fully understand what content they censor and that, rather than each censored keyword being born of careful consideration, many seem to have been thoughtlessly reappropriated from other sources. In one case, Apple censored ten Chinese names surnamed Zhang, who generally have

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unclear political significance and whose names appear to have been copied from a list we found used to censor products from a Chinese company.

We would appreciate your timely response to the following questions:

1. Which laws, regulations, or policies (internal to Apple or external to Apple) govern or apply to the use of keywords to filter engravings in China, Hong Kong, and Taiwan?
2. Do there exist public facing documents published by Apple that explain how Apple applies keyword filtering to engravings in China, Hong Kong, and Taiwan? If so, where? If not, why not?
3. What entities—within or outside Apple—were involved in developing the lists of keywords filtered by Apple in mainland China, Hong Kong, and Taiwan?
4. Has Apple received directives on what keywords to filter from specific government agencies or individuals? If so, from which agencies and individuals, and how often? Were they followed and why?
5. Did Apple derive its lists used to filter engravings in mainland China, Hong Kong, or Taiwan by drawing on or being informed by any other source(s)? If so, which?
6. Why did Apple decide to censor the following keywords for engravings in mainland China: “人权” (human rights), “掰” (bye), “建联通” (build China Unicom), “张晓平” (Zhang Xiaoping), and “正法” (dharma)?
7. How many keyword filtering rules does Apple currently use to filter engravings in each of the following regions: mainland China, Hong Kong, Taiwan, Japan, Canada, and the United States?

We plan to publish a report reflecting our research. We would appreciate a response to this letter from your company as soon as possible, which we commit to publish in full alongside our research report provided this correspondence is received before August 16, 2021.

Sincerely,



Professor Ronald J. Deibert, OOnt



Professor of Political Science, University of Toronto

Director, the Citizen Lab at the Munk School of Global Affairs & Public Policy, University of Toronto