

Congress of the United States
House of Representatives

COMMITTEE ON OVERSIGHT AND REFORM

2157 RAYBURN HOUSE OFFICE BUILDING

WASHINGTON, DC 20515-6143

MAJORITY (202) 225-5051
MINORITY (202) 225-5074
<https://oversight.house.gov>

April 6, 2021

Ms. Susan Wojcicki
Chief Executive Officer
YouTube
901 Cherry Avenue
San Bruno, CA 94066

Dear Ms. Wojcicki:

The Subcommittee on Economic and Consumer Policy requests documents and information about the YouTube Kids platform, following concerning reports about content quality and the impact of extended screen time on children's development.

YouTube Kids, as the name suggests, serves an audience of children, but it appears to be serving up inappropriate, low-education, highly commercial content. I believe that may be ascribable to your advertisement-based business model and reliance on free uploads of user-generated videos without adequate quality control. YouTube profits from this disservice of children with more paid ads and more corporate revenue.

Targeted advertising has historically made up a large part of the advertisements on YouTube for all consumers, regardless of age. However, since September 4, 2019, your company is no longer able to conduct targeted advertising to children in the way that it had previously done. YouTube entered into a \$170 million settlement with the Federal Trade Commission (FTC) regarding allegations that YouTube violated the Children's Online Privacy Protection Act (COPPA) by collecting and selling data from children without parental permission.¹ At that time, YouTube committed to privacy protections for children, including limiting data collection to only "what is needed to support the operation of the service," removing personalized advertisements and disabling comment and notification features.² On January 6, 2020, YouTube implemented its new privacy policy for YouTube Kids, announcing that its new protections applied for all viewers of children's content, regardless of age.³

¹ Federal Trade Commission, *Google and YouTube Will Pay Record \$170 Million for Alleged Violations of Children's Privacy Law* (Sept. 4, 2019) (online at www.ftc.gov/news-events/press-releases/2019/09/google-youtube-will-pay-record-170-million-alleged-violations).

² YouTube Official Blog, *An Update on Kids and Data Protection on YouTube* (Sept. 4, 2019) (online at <https://blog.youtube/news-and-events/an-update-on-kids>).

³ *4 Things to Know About YouTube's New Children Privacy Practices*, New York Times (Jan. 6, 2020) (online at www.nytimes.com/2020/01/06/technology/youtube-children-privacy.html).

We understand that YouTube Kids intends to continue trying to maximize ad impressions, with that revenue stream remaining the basis of your business model. Even after its privacy changes, YouTube Kids continues to show ads to children, but is now basing ad selection on the context of the video being watched, rather than web-browsing and online activity data.⁴ Advertising has been very lucrative for YouTube, with the company bringing in over \$15 billion in ad revenue in 2019.⁵ YouTube's 2020 advertising revenue jumped even higher to nearly \$20 billion, despite the company's being forced to ditch targeted advertisements to children.⁶

After the mandated changes, ads may be reaching children in other concerning manners. It appears that a high volume of "made for kids" videos are smuggling in hidden marketing and advertising with product placements by children's influencers.⁷ YouTube does not appear to be trying to prevent such problematic marketing. In fact, YouTube tells parents that content may contain unidentified marketing, stating that "[v]ideos uploaded by users to YouTube are not Paid Ads and therefore they are not marked as an Ad nor are they subject to our advertising policies."⁸

One research team found that "[a]lmost half of videos viewed by children eight and under featured or promoted products for them to buy," while "[o]nly about 4% of videos had a high educational value offering quality, developmentally appropriate content." This analysis paints a picture of a wasteland of vapid, consumerist content, such as "toy unboxing" videos, "toy play" videos, and videos of people playing video games.⁹

According to the public health experts at the American Academy of Pediatrics (AAP), there is no place for commercial ads to children younger than seven years of age. In a report reviewing the state of online marketing to children, AAP found that "[c]hildren's and teenagers' unique developmental needs make them more vulnerable to negative physical, mental, and financial health effects of digital marketing" and that it is "crucial that there are measures in place in children's digital media environments to protect their needs." AAP firmly recommended: "Ban all commercial advertising to children younger than 7 years, and limit advertising to older children and teenagers. All advertising should be clearly labeled as such

⁴ *4 Things to Know About YouTube's New Children Privacy Practices*, New York Times (Jan. 6, 2020) (online at www.nytimes.com/2020/01/06/technology/youtube-children-privacy.html).

⁵ Alphabet Inc., *Annual Report for Fiscal Year 2019* (Feb. 3, 2020) (online at https://abc.xyz/investor/static/pdf/20200204_alphabet_10K.pdf).

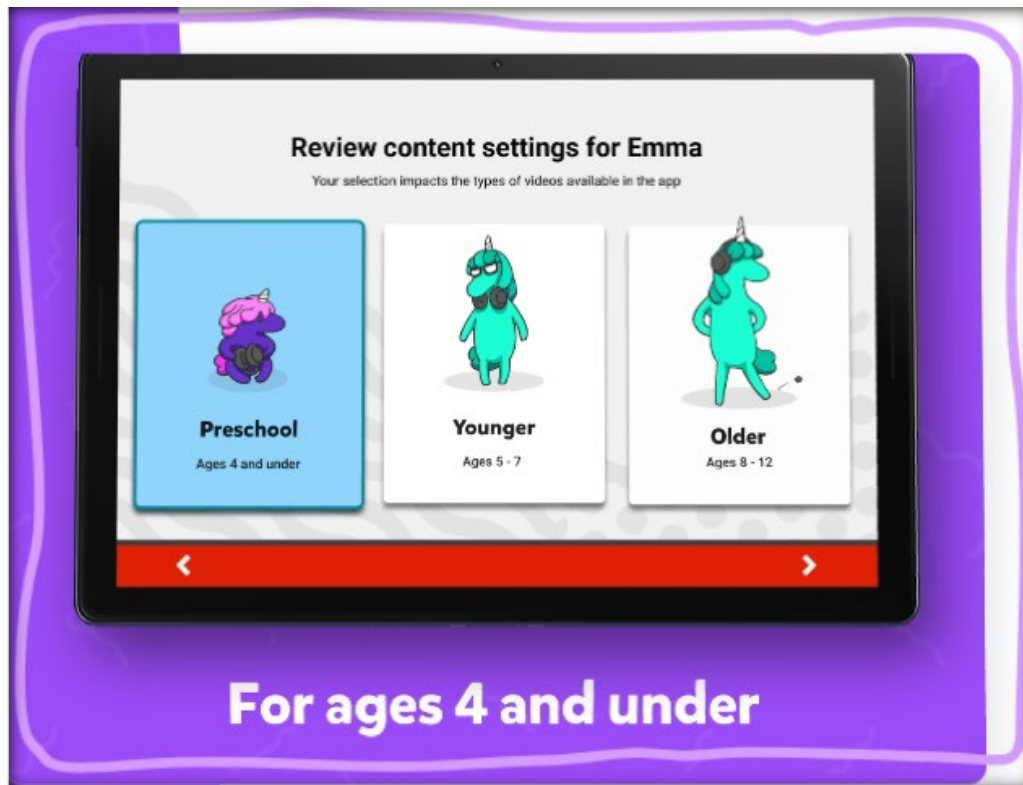
⁶ Alphabet, Inc., *Form 10-Q*, (Sept. 30, 2020) (online at https://abc.xyz/investor/static/pdf/20201030_alphabet_10Q.pdf?cache=4d557b4); Alphabet, Inc., *Alphabet Announces Fourth Quarter and Fiscal Year 2020 Results* (Feb. 2, 2021) (online at https://abc.xyz/investor/static/pdf/2020Q4_alphabet_earnings_release.pdf?cache=9e991fd).

⁷ *Toy Commercials Are Being Replaced by Something More Nefarious*, The Atlantic (Feb. 2, 2020) (online at www.theatlantic.com/family/archive/2020/02/how-toys-are-marketed-kids-without-cable-tv/605920/).

⁸ YouTube, *YouTube Kids Parental Guide: Ads in YouTube Kids* (online at <https://support.google.com/youtubekids/answer/6130541>) (accessed Mar. 15, 2021).

⁹ *Young Kids' YouTube Viewing Dominated by Consumerism, Ads*, University of Michigan Health Lab (Nov. 16, 2020) (online at <https://lablog.uofmhealth.org/health-tech/young-kids-youtube-viewing-dominated-by-consumerism-ads>).

(e.g., as sponsored content).”¹⁰ In light of these findings, the Subcommittee hopes that you have considered removing all advertisements from the two YouTube content settings limited to children aged seven years and younger:



Every minute, more than 500 hours of new content is uploaded onto YouTube.¹¹ The Subcommittee has concerns about the quality of content and the process by which content is made available to children on YouTube Kids.

YouTube Kids spends no time or effort determining the appropriateness of content before it becomes available for children to watch. YouTube Kids allows content creators to self-regulate. YouTube only *asks* that they consider factors including “the subject matter of the video, whether the video has an emphasis on kids characters, themes, toys or games, and more.”¹² In practice, creators can designate any content as “made for kids.” Once they do, the videos may be posted to the YouTube Kids platform. YouTube also uses artificial intelligence to help identify additional children’s content.¹³ YouTube does not go far enough to protect

¹⁰ American Academy of Pediatrics, *Policy Statement: Digital Advertising to Children*, Pediatrics (July 2020) (online at <https://pediatrics.aappublications.org/content/146/1/e20201681>).

¹¹ *These YouTube Settings Will Help You Find What You Actually Want to Watch*, Gizmodo (Feb. 16, 2021) (online at <https://gizmodo.com/these-youtube-settings-will-help-you-find-what-you-actu-1846271158>).

¹² YouTube Official Blog, *Better Protecting Kids’ Privacy on YouTube* (Jan. 6, 2020) (online at <https://blog.youtube/news-and-events/better-protecting-kids-privacy-on-youtube/>).

¹³ *4 Things to Know About YouTube’s New Children Privacy Practices*, New York Times (Jan. 6, 2020) (online at www.nytimes.com/2020/01/06/technology/youtube-children-privacy.html).

children online. YouTube's lax approach to designating "made for kids" content also stands in stark contrast to how YouTube scrutinizes paid ads. According to YouTube, paid ads are "approved as family-friendly" and "undergo a rigorous review process for compliance with our policies."¹⁴

This model has allowed horrific content onto your platform. For instance, one mother reported watching with her son a kid's video that contained chilling advice on how to commit suicide: "Four minutes and forty-five seconds into the video. [sic] The man quickly walked in, held his arm out, and tracing his forearm, said, 'Kids, remember, cut this way for attention, and this way for results,' and then quickly walked off."¹⁵ Even after this video was reported, YouTube failed to remove it, leaving it up for another eight months.¹⁶ We are concerned by YouTube's attempt to shift the responsibility of defining kid-appropriate content from itself to anyone with an internet connection.

The Subcommittee is also concerned that YouTube policies could be hastening the erosion of content quality on your platform. Following the changes required by your company's settlement with FTC, content creators have posited that the changes could decrease their YouTube earnings by up to 90%, which could make it economically infeasible to create high-quality educational content.¹⁷ This could drive creators to disguise ads in their content, for which they receive compensation from commercial sponsors.

Even when content creators and the identification algorithm do correctly designate content as "made for kids," the majority of content on YouTube Kids appears to be of no educational value, with content instead focused on incorporating common keywords and well-known children's characters to increase its chances of being picked up in searches and by the recommendation algorithm.¹⁸ Colorful, catchy songs are promoted by YouTube's recommendation algorithm, encouraging children to watch these videos over educational, research-backed content.

We also are concerned by the amount of time children are spending on your platform. YouTube Kids continues to utilize recommendation algorithms "based on watch and search history."¹⁹ And unlike on traditional YouTube, YouTube Kids auto-plays new videos without

¹⁴ YouTube, *YouTube Kids Parental Guide: Ads in YouTube Kids* (online at <https://support.google.com/youtubekids/answer/6130541>) (accessed Mar. 15, 2021).

¹⁵ *YouTube Kids Scare*, PediMom (online at <https://pedimom.com/youtube-kids-scare/>) (accessed Mar. 8, 2021).

¹⁶ #*YouTubeWakeUp*, #*ProtectOurKids*, PediMom (online at <https://pedimom.com/youtube-protectourkids/>) (accessed Mar. 8, 2021).

¹⁷ *The Golden Age of Kids' YouTube Is Over. Good.*, Vox (Dec. 20, 2019) (online at www.vox.com/the-goods/2019/12/20/21025139/youtube-kids-coppa-law-ftc-2020).

¹⁸ TechCrunch, *I Watched 1,000 Hours of YouTube Kids' Content and This is What Happened...* (Nov. 12, 2017) (online at <https://techcrunch.com/2017/11/12/i-watched-1000-hours-of-youtube-kids-content-and-this-is-what-happened/>).

¹⁹ YouTube, *YouTube Kids Parental Guide: Recommended Videos* (online at <https://support.google.com/youtubekids/answer/6130531>) (accessed Mar. 15, 2021).

warning, with no option to turn off the feature. This places the onus on the child to stop their viewing activity, rather than providing a natural break or end point. Without that natural stopping point, children are likely to continue watching for long periods of time. The optional timer tool on your platform can be helpful but is not a substitute for addressing the underlying reasons children are drawn to stay on your platform for long periods of time, including auto-play.

Studies have shown that too much screen time for preschool-aged children can lead to damage in the regions of the brain related to literacy, language processing, and speech.²⁰ AAP found that children spend a shocking average of seven hours per day on entertainment media.²¹ By contrast, the American Academy of Child & Adolescent Psychiatry recommends that parents, “limit non-educational screen time to about 1 hour per weekday and 3 hours on the weekend days.”²² In addition to the threat of harm to children’s development, too much screen time can cause sleep problems, mental health issues, and obesity in children and young adults.²³ YouTube Kids’ potentially addictive qualities also appear to be interfering with the regular course of education, especially during the pandemic. From 2019 to 2020, as YouTube usage increased 22%, one-third of parents reported that their children are distracted from remote learning by YouTube and apps like it.²⁴

As many parents know, YouTube Kids can be a useful tool to pacify and entertain children—and, we wish, to educate. However, YouTube appears to be exploiting children by serving them a non-stop stream of low-quality, commercial content. More must be done to protect children from exposure to marketing and too much screen time.

In order to assist the Subcommittee in its review of this matter, please provide the following documents and information regarding YouTube Kids in the United States market by April 20, 2021:

1. Spreadsheets reflecting the following information for two time periods: (1) January 6, 2019, to January 5, 2020, and (2) January 6, 2020, to January 5, 2021:
 - a. top 1000 videos by number of views and time watched (identified by title, channel, URL, and length), and for each video the number of views, total time watched, total ad revenue for YouTube, and amount paid to the channel;

²⁰ Hutton et al., *Associations Between Screen-Based Media Use and Brain White Matter Integrity in Preschool-Aged Children*, JAMA Pediatrics (Nov. 4, 2019) (online at <https://jamanetwork.com/journals/jamapediatrics/fullarticle/2754101>).

²¹ American Academy of Pediatrics, *Media and Children* (online at <https://services.aap.org/en/patient-care/media-and-children/>) (accessed Mar. 12, 2021).

²² American Academy of Child & Adolescent Psychiatry, *Screen Time and Children* (Feb. 2020) (online at www.aacap.org/AACAP/Families_and_Youth/Facts_for_Families/FFF-Guide/Children-And-Watching-TV-054.aspx).

²³ *Children and Adolescents and Digital Media*, Official Journal of the American Academy of Pediatrics (Nov. 2016) (online at <https://doi.org/10.1542/peds.2016-2593>).

²⁴ *Fears Rise as Kids Spend Even More Time on Digital Media*, Axios (Mar. 16, 2021) (online at www.axios.com/kids-digital-media-addiction-55b37cfe-da13-43bb-9f3c-b78956953e98.html).

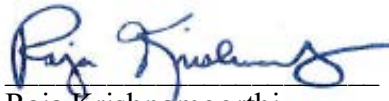
- b. top 200 channels, and for each channel the number of views, total time watched, total ad revenue for YouTube, and amount paid to the channel;
 - c. copies of the top 100 YouTube Kids Paid Ads by impressions, as well as identification of the advertiser and the revenue generated for each ad;
 - d. median and mean revenue for monetized channels—both total ad revenue to YouTube and amount paid to the channel—broken out by source of revenue (e.g., targeted ads, banner ads, paid ads before videos);
 - e. distribution, by decile, of length of time spent on YouTube Kids in one session;
 - f. distribution, by decile, of number of videos watched in one session;
 - g. distribution, by decile, of number of viewing sessions per day per user;
 - h. distribution, by decile, of total time watched per day per user;
 - i. total number of users;
 - j. total number of videos viewed;
 - k. total time watched;
 - l. the number of videos viewed by each different means of access (e.g., the recommended page, the explore page, suggested videos, search, or auto-play);
 - m. total revenues from all sources, broken out by category (e.g., subscriptions, paid ads, banner ads, sponsored content); and
 - n. for (e) through (m), the breakdown for different age categories (e.g., “preschool,” “younger,” and “older”);
2. A list of all data fields collected, stored, accessed, or used by YouTube Kids from February 15, 2015, to the present, including the source of data and how YouTube Kids uses it or used it, and including all changes over the time period;
 3. A detailed explanation of how paid ads are selected for display to children, including all inputs for the selection algorithm (including YouTube Kids viewing history, parents’ account’s web-browsing and viewing history, and other data);
 4. A detailed explanation of how the recommendation algorithm determines which videos to promote to children, categorizes viewers (with a list of categories), categorizes videos (with a list of categories), and moderates content;

5. For each year from 2016 to 2020:
 - a. number of videos reported to YouTube Kids, broken out by reason identified (e.g., inappropriate audio or inappropriate visuals), including, for all such videos, the total number of views and length of time watched on YouTube Kids;
 - b. number of videos removed because they were inappropriate for kids, broken out by reason identified, including, for all such videos, the total number of views and length of time watched on YouTube Kids before being removed;
 - c. number of channels or creators blocked from YouTube Kids, including, for all such channels, the total number of views and length of time watched on YouTube Kids before being blocked;
 - d. copies, including title, channel, and description, of the top 200 videos, by number of views and time watched, that were removed from YouTube Kids because they were inappropriate for kids, including for each video the number of views and length of time watched on YouTube Kids before being removed;
6. All policies and procedures regarding:
 - a. reviewing and approving paid ads;
 - b. marketing and commercial content in videos designated as “made for kids,” including product placements and sponsor-supported influencers;
 - c. reviewing content flagged as incorrectly designated as “made for kids”; including all criteria for determining what constitutes inappropriate, distressing, or traumatizing content;
 - d. addressing consumer complaints about inappropriate, distressing, or traumatic content;
 - e. protections in place to prevent children from accessing and viewing inappropriate, distressing, or traumatizing content;
 - f. onboarding and screening creators before they are able to upload content; and
 - g. blocking channels or creators from YouTube Kids, including possible reasons for blocking and processes to prevent channels or creators from posting from another account;
7. All documents regarding product and user-experience design elements for YouTube Kids, such as auto-play, including proposals; pilot studies; behavioral analytics; assessments of impacts on usage, engagement, viewing habits, and quality of user

- experience; analysis of ethical considerations; decision memos; meeting minutes; and follow-up reviews of implemented features;
8. All internal reports, analyses, and strategies regarding the quality of content on YouTube Kids, including the quantity and quality of educational, commercial, marketing, and unwholesome content;
 9. All drafts of any reports, reviews, and analyses, whether published or not, of YouTube Kids by YouTube's "Trust and Safety" team or Google's "ethical AI" team;
 10. All research regarding children's usage of YouTube Kids and its effects on education, development, and emotional well-being; and
 11. All consumer complaints regarding inappropriate, distressing, traumatic, or commercialized content, including the video containing suicide instructions described above, and records of YouTube's responses.

The Committee on Oversight and Reform is the principal oversight committee of the House of Representatives and has broad authority to investigate "any matter" at "any time" under House Rule X. An attachment to this letter provides additional instructions for responding to the Committee's request. If you have any questions regarding this request, please contact Committee staff at (202) 225-5051.

Sincerely,



Raja Krishnamoorthi
Chairman
Subcommittee on Economic and Consumer Policy

Enclosure

cc: The Honorable Michael Cloud, Ranking Member
Subcommittee on Economic and Consumer Policy

Responding to Oversight Committee Document Requests

1. In complying with this request, produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, and representatives acting on your behalf. Produce all documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.
2. Requested documents, and all documents reasonably related to the requested documents, should not be destroyed, altered, removed, transferred, or otherwise made inaccessible to the Committee.
3. In the event that any entity, organization, or individual denoted in this request is or has been known by any name other than that herein denoted, the request shall be read also to include that alternative identification.
4. The Committee's preference is to receive documents in electronic form (i.e., CD, memory stick, thumb drive, or secure file transfer) in lieu of paper productions.
5. Documents produced in electronic format should be organized, identified, and indexed electronically.
6. Electronic document productions should be prepared according to the following standards:
 - a. The production should consist of single page Tagged Image File ("TIF"), files accompanied by a Concordance-format load file, an Opticon reference file, and a file defining the fields and character lengths of the load file.
 - b. Document numbers in the load file should match document Bates numbers and TIF file names.
 - c. If the production is completed through a series of multiple partial productions, field names and file order in all load files should match.
 - d. All electronic documents produced to the Committee should include the following fields of metadata specific to each document, and no modifications should be made to the original metadata:

BEGDOC, ENDDOC, TEXT, BEGATTACH, ENDATTACH, PAGECOUNT, CUSTODIAN, RECORDTYPE, DATE, TIME, SENTDATE, SENTTIME, BEGINDATE, BEGINTIME, ENDDATE, ENDTIME, AUTHOR, FROM, CC, TO, BCC, SUBJECT, TITLE, FILENAME, FILEEXT, FILESIZE, DATECREATED, TIMECREATED, DATELASTMOD, TIMELASTMOD,

INTMSGID, INTMSGHEADER, NATIVELINK, INTFILPATH, EXCEPTION,
BEGATTACH.

7. Documents produced to the Committee should include an index describing the contents of the production. To the extent more than one CD, hard drive, memory stick, thumb drive, zip file, box, or folder is produced, each should contain an index describing its contents.
8. Documents produced in response to this request shall be produced together with copies of file labels, dividers, or identifying markers with which they were associated when the request was served.
9. When you produce documents, you should identify the paragraph(s) or request(s) in the Committee's letter to which the documents respond.
10. The fact that any other person or entity also possesses non-identical or identical copies of the same documents shall not be a basis to withhold any information.
11. The pendency of or potential for litigation shall not be a basis to withhold any information.
12. In accordance with 5 U.S.C. § 552(d), the Freedom of Information Act (FOIA) and any statutory exemptions to FOIA shall not be a basis for withholding any information.
13. Pursuant to 5 U.S.C. § 552a(b)(9), the Privacy Act shall not be a basis for withholding information.
14. If compliance with the request cannot be made in full by the specified return date, compliance shall be made to the extent possible by that date. An explanation of why full compliance is not possible shall be provided along with any partial production.
15. In the event that a document is withheld on the basis of privilege, provide a privilege log containing the following information concerning any such document: (a) every privilege asserted; (b) the type of document; (c) the general subject matter; (d) the date, author, addressee, and any other recipient(s); (e) the relationship of the author and addressee to each other; and (f) the basis for the privilege(s) asserted.
16. If any document responsive to this request was, but no longer is, in your possession, custody, or control, identify the document (by date, author, subject, and recipients), and explain the circumstances under which the document ceased to be in your possession, custody, or control.
17. If a date or other descriptive detail set forth in this request referring to a document is inaccurate, but the actual date or other descriptive detail is known to you or is otherwise apparent from the context of the request, produce all documents that would be responsive as if the date or other descriptive detail were correct.

18. This request is continuing in nature and applies to any newly-discovered information. Any record, document, compilation of data, or information not produced because it has not been located or discovered by the return date shall be produced immediately upon subsequent location or discovery.
19. All documents shall be Bates-stamped sequentially and produced sequentially.
20. Two sets of each production shall be delivered, one set to the Majority Staff and one set to the Minority Staff. When documents are produced to the Committee, production sets shall be delivered to the Majority Staff in Room 2157 of the Rayburn House Office Building and the Minority Staff in Room 2105 of the Rayburn House Office Building.
21. Upon completion of the production, submit a written certification, signed by you or your counsel, stating that: (1) a diligent search has been completed of all documents in your possession, custody, or control that reasonably could contain responsive documents; and (2) all documents located during the search that are responsive have been produced to the Committee.

Definitions

1. The term “document” means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, data, working papers, records, notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, communications, electronic mail (email), contracts, cables, notations of any type of conversation, telephone call, meeting or other inter-office or intra-office communication, bulletins, printed matter, computer printouts, teletypes, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, and work sheets (and all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments of any of the foregoing, as well as any attachments or appendices thereto), and graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings and motion pictures), and electronic, mechanical, and electric records or representations of any kind (including, without limitation, tapes, cassettes, disks, and recordings) and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, disk, videotape, or otherwise. A document bearing any notation not a part of the original text is to be considered a separate document. A draft or non-identical copy is a separate document within the meaning of this term.
2. The term “communication” means each manner or means of disclosure or exchange of information, regardless of means utilized, whether oral, electronic, by document or otherwise, and whether in a meeting, by telephone, facsimile, mail, releases, electronic

message including email (desktop or mobile device), text message, instant message, MMS or SMS message, message application, or otherwise.

3. The terms “and” and “or” shall be construed broadly and either conjunctively or disjunctively to bring within the scope of this request any information that might otherwise be construed to be outside its scope. The singular includes plural number, and vice versa. The masculine includes the feminine and neutral genders.
4. The term “including” shall be construed broadly to mean “including, but not limited to.”
5. The term “Company” means the named legal entity as well as any units, firms, partnerships, associations, corporations, limited liability companies, trusts, subsidiaries, affiliates, divisions, departments, branches, joint ventures, proprietorships, syndicates, or other legal, business or government entities over which the named legal entity exercises control or in which the named entity has any ownership whatsoever.
6. The term “identify,” when used in a question about individuals, means to provide the following information: (a) the individual’s complete name and title; (b) the individual’s business or personal address and phone number; and (c) any and all known aliases.
7. The term “related to” or “referring or relating to,” with respect to any given subject, means anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or is pertinent to that subject in any manner whatsoever.
8. The term “employee” means any past or present agent, borrowed employee, casual employee, consultant, contractor, de facto employee, detailee, fellow, independent contractor, intern, joint adventurer, loaned employee, officer, part-time employee, permanent employee, provisional employee, special government employee, subcontractor, or any other type of service provider.
9. The term “individual” means all natural persons and all persons or entities acting on their behalf.