

Disclosing the Use of Synthetic Media in Political Candidate and Issue Advertisements

Advances in digital technology, including artificial intelligence, can make it easier to create or alter images, video, audio, text, and other elements of advertisements so as to present real or realistic-looking people, events, or any other subject matter (“Synthetic Media”). Sometimes, this can be done in a way that is not obvious or transparent to viewers. This policy seeks to enhance transparency by mandating clear disclosures when Synthetic Media is used in political candidate advertisements and issue advertisements (“PCI Ads”) running on NBCUniversal platforms.*

Advertisers submitting PCI Ads for review must prominently disclose in the PCI Ad when such PCI Ad contains Synthetic Media that, for example:

- A. creates or alters the image, video, audio, text, or any other depiction or representation of a real person or footage of a real event or other realistic subject.
- B. creates a realistic person who doesn’t exist or a realistic event that didn’t happen.

The disclosure must be clearly visible and easily understandable and remain on screen at least long enough to be read by the average viewer but in no event less than required by applicable law. Acceptable disclosure language and formatting will vary depending on the specific context of the PCI Ad and may be specified by applicable law, but must in any event be clear, specific, and in proximity to the altered elements in the PCI Ad. Some examples include:

- This audio was digitally altered.
- This audio is simulated.
- This image does not depict real events.
- This ad was synthetically generated.
- This message was generated wholly or partly by artificial intelligence.
- The images [or video] of people in this message are not real.

Advertisers need not disclose Synthetic Media used for purposes like resizing, cropping, or background edits, if the results are immaterial to the PCI Ad’s claims or assertions and such non-disclosure is compliant with applicable law.

By placing PCI Ads with NBCUniversal, advertisers certify that such PCI Ads conform to this policy and that any use of Synthetic Media complies with applicable law, including disclosure requirements. NBCUniversal reserves the right to accept, reject, or remove any PCI Ad at any time, including PCI Ads that are in violation of the above policy or any other NBCUniversal policy, or that are otherwise false, deceptive, or misleading, or include claims that fall outside the bounds of reasonable debate.* NBCUniversal may also refuse to accept future advertising from advertisers who violate this policy.

This policy will undergo periodic review, and adjustments may be made based on changes in technology and industry standards, as well as the laws of relevant jurisdictions. NBCUniversal does not represent that compliance with this policy constitutes compliance with applicable laws on this topic.

* This policy does not mandate disclosure for advertisements subject to the FCC’s prohibition on censorship or rejection of certain political ads on broadcast outlets.