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April 22, 2026

Via Email

The Honorable Charles E. Grassley
Chairman
Committee on the Judiciary
United States Senate
Washington, DC 20510

Re: April 8, 2026 Letter Regarding NCMEC Reporting

Dear Chairman Grassley,

Thank you for your April 8 letter¹ regarding the reporting of incidents of potential child exploitation to the National Center for Missing and Exploited Children (NCMEC). Roblox continuously solicits and receives feedback from NCMEC and law enforcement regarding its reports required by 18 U.S.C. § 2258A; Roblox further coordinates with NCMEC to provide actionable CyberTip reports, including information that goes well beyond the minimum required by the statute.

As you noted, your outreach was prompted by a letter from NCMEC that identified potential areas of improvement for the eight companies that submit the highest volume of reports annually, of which Roblox is one.² You expressed concern that “some companies” have not provided sufficient data to protect children; however, as described below, Roblox engages extensively with NCMEC and law enforcement in efforts to provide both actionable and high-quality data. While we recognize that excellence in this space requires constant diligence as threats evolve, we do not agree that significant issues concerning reporting quality apply to the data Roblox provides under 18 U.S.C. § 2258A. Roblox has long treated child exploitation issues as an utmost priority and has consistently engaged with NCMEC and law enforcement about how best to tailor our reports to the needs of NCMEC and law enforcement. We have developed and deployed reporting system improvements and hired experienced, qualified practitioners (including former NCMEC employees) to operate and update these systems. Roblox is, among

¹ See Letter from Charles E. Grassley, Chairman, Senate Comm. on the Judiciary, to Mr. David Baszucki, Founder and Chief Executive Officer, Roblox Corp., (April 8, 2026), https://www.grassley.senate.gov/imo/media/doc/grassley_to_roblox_-_ncmec_follow-up.pdf.

² See Letter from Michelle C. DeLaune, President, Chief Executive Officer, National Center for Missing & Exploited Children to Charles E. Grassley, Chairman, Senate Comm. on the Judiciary, (March 16, 2026), https://www.grassley.senate.gov/imo/media/doc/ncmec_to_grassley_-_cybertipline_data.pdf.



other efforts, closely focused on the two issues highlighted in NCMEC’s letter – clearly identifying victims in reports and ensuring clear reporting of instances of Sadistic Online Exploitation (“SOE”) – by engaging with the organization from front line staff up through senior leadership. Below, we further describe those efforts in response to your questions.

Question 1: Please describe feedback from NCMEC regarding reports you are required to provide pursuant to 18 U.S.C. § 2258A. What changes or policies were developed in response to this feedback? If no changes or policies were implemented, please state so and explain in detail why your company declined to take additional action. Provide all records.

By way of background, NCMEC feedback on reporting by Roblox pursuant to 18 U.S.C. § 2258A generally falls into two categories:

- First, Roblox employees regularly interact with NCMEC staff in the course of handling specific reports. For example, NCMEC staff may contact Roblox employees to clarify reports, Roblox employees may proactively contact NCMEC employees to clarify or highlight information, and members of NCMEC and Roblox teams meet regularly. Roblox believes that this strong relationship is a key part of a maximally responsive and helpful reporting system. Feedback from those interactions is incorporated into improvements on an ongoing basis in our reporting system.
- Second, Roblox provides information and seeks feedback at in-person meetings. These include NCMEC’s annual CyberTipline Roundtable (most recently November 2025) and the Virtual Global Taskforce³ meeting on April 14, 2026, at which Roblox described ongoing efforts to execute on NCMEC’s feedback. Additionally, Roblox is participating at an intensive on-site 1:1 workshop at NCMEC on Friday, April 24, 2026, specifically focused on improving its reports.

We briefly describe some key recent changes that were the result of NCMEC feedback. Reporting improvements are of course iterative and the result of the multiple feedback channels described above. The records we will provide will give further instances of feedback and our changes.

- For example, we received feedback from NCMEC that clear and timely identification of instances of SOE would be helpful. To address this concern, in January 2026, Roblox implemented annotation capabilities within our proactive detection decisions. While the Roblox team implemented annotations in Fall 2025, this new method allows our Safety team to quickly tag a matter as involving (for example) Sadistic Online Exploitation, and to include that annotation in our CyberTip to NCMEC at scale. The new annotation

³ See <https://www.afp.gov.au/virtual-global-taskforce>.





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method allows for more efficient and timely tagging by our Safety team, who work with NCMEC to ensure that these annotations are being used appropriately.

- As another example, we received feedback from NCMEC that information about whether phone numbers and email addresses are verified would be helpful. In response, in March 2026, Roblox began automatically including the verification status of a phone number associated with reported accounts. Additionally, we include the verification status of any email addresses associated with reported accounts.
- In addition, NCMEC and law enforcement told us that IP port numbers (in addition to IP addresses) can make a report more actionable. Law enforcement can use this information to “pivot” on the reported IP address-plus-port via the Internet Service Provider. While port numbers were not previously collected by Roblox, Roblox recently began collecting port numbers and, earlier this month, began including them in our reports.

Question 2: What steps has your company taken to improve child exploitation reporting in 2026? If none, why not?

Building on and incorporating the responses above, we have also taken steps to address the two issues noted in NCMEC’s letter.

The NCMEC letter identified an issue in which reports that list multiple child accounts do not clearly enough identify which child account is the victim. Based on feedback Roblox has received, we understand this can make it more difficult for law enforcement to quickly review and take action on reports. While we want to provide law enforcement with all potential supporting evidence to make their case, Roblox recognizes that more information without further context may overload law enforcement and distract from what is most important.

Roblox is working on mechanisms to better refine the information included with reports to focus law enforcement attention on key information while not sacrificing important context or causing duplicate efforts by multiple law enforcement agencies. To the extent that further contextual information is included in a given report, Roblox is exploring whether it could separate this additional evidence into a clearly labeled “informational” attachment. Our on-site working level meeting at NCMEC on April 24 will discuss specific instances of this issue and proposed solutions.

In addition to reporting, Roblox is constantly working to improve its detection systems, and as our detection systems continue to improve, surfacing more reports for law enforcement to review, we appreciate that it is especially important to highlight key information and relevant context. And as we make some of our tools, such as our “Sentinel” AI system for detecting potential groomers openly available to other platforms, we appreciate that the volume of reports from those platforms may likewise increase.





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The NCMEC letter also noted that the number of instances of SOE allegedly occurring on Roblox, as reported by the public to NCMEC, is higher than the number of instances of SOE that Roblox reports to NCMEC. SOE is a top priority for Roblox, and we have specially trained staff and automated systems for rooting out and addressing potential instances. To date, NCMEC has only provided to Roblox the raw numbers of public reports, without further context (e.g., Roblox identifiers or other signals) necessary to look into specific instances and potentially improve systems. Further information from NCMEC would be helpful to understand whether public reports of SOE on Roblox accurately reflect the actual rates of SOE occurring on the platform. For example, an instance of SOE that manifests on Roblox merely as a suggestion to move off-platform (and beyond Roblox's purview) would likely not be reportable by Roblox to NCMEC (whether as SOE or otherwise), notwithstanding that such activity would still violate Roblox's strict [Community Standards](#).⁴

Roblox and NCMEC have recently had positive conversations about Roblox potentially obtaining the aforementioned public reports from NCMEC to further evaluate and potentially improve its SOE detection and enforcement. We anticipate discussion with NCMEC during our April 24 on-site meeting.

Question 3: What steps has your company taken to improve location information provided to NCMEC? If none, why not?

As described in response to question 1, as the result of feedback and discussion with NCMEC and law enforcement, Roblox now provides IP-plus-port information, which we understand to be crucial to IP-based law enforcement investigations. This is in addition to Roblox providing available phone numbers (including the area code and/or country code) associated with a reported account. NCMEC did not highlight location information as a potential area for improvement for Roblox in its March 16 letter but the company is of course open to any suggestions.

Safeguarding against child exploitation is a continuous process and, as noted above, we have ongoing discussions with NCMEC scheduled and various efforts underway. We therefore would like to reserve the right to supplement this response as appropriate.

Your letter also asks for documents related to your questions, including feedback from NCMEC. As discussed with your staff, we will follow up with related documents, including the output of an already-scheduled working-level meeting between Roblox and NCMEC on these issues on April 24, 2026.

⁴ Roblox has extensive measures that are designed to prevent users from directing other users off-platform, including text filtering to block it beforehand and enforcement consequences if detected after the fact.





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Please do not hesitate to contact me if you have any questions regarding this submission.

Sincerely,

A handwritten signature in blue ink that reads "Mark Reinstra".

Mark Reinstra
Chief Legal Officer, Roblox

