Via Email

November 6, 2026

Govind Mohan
Union Home Secretary, MHA

Rajesh Kumar
CEO, Indian Cyber Crime Coordination Centre

S. Krishnan
Secretary, Ministry of Electronics and Information Technology

Manoj Kumar Meena
Director, Indian Cyber Crime Coordination Centre

Deepak Goel
Cyber Law Division, Ministry of Electronics and Information Technology

Aishwarya Dongre
Deputy Director, Indian Cyber Crime Coordination Centre

Re: Reporting of Online Child Sexual Exploitation with a Nexus to India to NCMEC's CyberTipline

Dear Mr. Mohan, Mr. Krishnan, Mr. Goel, Mr. Kumar, Mr. Meena, and Ms. Dongre:

I write on behalf of The National Center for Missing and Exploited Children (NCMEC) and the children and families impacted by online child sexual exploitation around the world who NCMEC serves. NCMEC is aware of ongoing discussions relating to the Supreme Court of India's recent decision concerning reports of online child sexual exploitation with a nexus to India. NCMEC is invested in ensuring that global reporting requirements relating to online child sexual exploitation avoid duplication, remain consistent for law enforcement agencies around the world, and reduce the time it takes for a child victim to be identified, removed from abusive situations, and safeguarded.

NCMEC is deeply concerned that any requirement for online platforms based in the United States to report separately to international agencies, as well as NCMEC as they are required to do under U.S. law, will result in significant negative impacts for child victims of sexual exploitation and law enforcement agencies charged with investigating these crimes. We respectfully request an opportunity to speak with you directly regarding NCMEC's CyberTipline process, how NCMEC handles reports relating to child sexual exploitation with a nexus to India, and the analytical value that NCMEC adds to CyberTipline reports, so that NCMEC can contribute to a reporting protocol that is in the best interest of children victimized by online sexual exploitation.

A. NCMEC's Operation of the CyberTipline

NCMEC operates the CyberTipline, which is the only dedicated global reporting mechanism for incidents relating to online child sexual abuse material, online enticement of children for sexual acts, and child sex trafficking. United States law requires all U.S.-based online platforms – including the largest online platforms in the world such as Meta, Google, TikTok, and Snapchat – to report incidents of child sexual exploitation to NCMEC's CyberTipline. There are no exceptions under U.S. law for online platforms to fulfill their reporting requirements to the CyberTipline by reporting to an international entity or law enforcement agency.

A majority of CyberTipline reports NCMEC receives relate to an incident of child sexual exploitation that occurred outside the United States. In 2025, NCMEC received more than 21.3 million CyberTipline reports, 77% of which related to incidents that involved a victim or an offender outside of the United States. Over the past 25 years, NCMEC has developed direct relationships with law enforcement agencies in more than 170 jurisdictions around the world to ensure that reports relating to non-U.S. incidents are made available expeditiously to the law enforcement agency located in the jurisdiction of the reported child sexual exploitation incident.

In addition to determining the geographic location of incidents reported to the CyberTipline, NCMEC devotes significant resources to conduct analytical assessments of the images, videos, and other content submitted in a CyberTipline report and annotates reports with information relating to the content, context, and level of egregiousness of the reported content. NCMEC's substantive analysis of reported content supports efforts by law enforcement to review and prioritize reports.

B. CyberTipline Reports Made Available to Law Enforcement in India

From January 2025 through September 2026, NCMEC made more than 5.5 million CyberTipline reports available to the Indian Cyber Crime Coordination Centre (I4C). Of these reports, NCMEC made more than 77% (4.2 million reports) available to I4C within one hour of receipt, and 89% were made available within 24 hours of receipt. All reports received by NCMEC's CyberTipline with a nexus to India were made available to I4C within an average of 52 hours.

The 5.5 million reports that NCMEC made available to I4C from January 2025 through September 2026, contained more than 6.5 million reported images and videos. NCMEC's systems analyzed, assessed, and added annotations relating to the content, context, and egregiousness of 64% of these reported images and videos. These annotations support the efforts of I4C and law enforcement in India to assess and prioritize reports for further review and potential action.

C. Dual Reporting Requirements Complicate Law Enforcement Review of Reports Relating to Online Child Sexual Exploitation and Risk Delaying Action to Safeguard Children

Requiring an online platform to report online child sexual exploitation incidents to multiple entities creates redundancies; burdens limited financial resources, time, technology, and personnel; and complicates and delays the investigation of reports and the safeguarding of children who are in abusive situations. For decades, NCMEC's CyberTipline has effectively handled reports from the world's major

online platforms and effectively and expeditiously assessed and added analytical value that supports law enforcement's review and prioritization of reports in their respective jurisdictions.

Requiring dual reporting to I4C under Indian law and to NCMEC's CyberTipline, as established by U.S. law, would create a system in which I4C would receive duplicate reports – one directly from an online platform and one made available by NCMEC's CyberTipline with NCMEC's added analytical value – without any protocol to reconcile duplicate reports. Given the volume of child sexual exploitation reports with a nexus to India – more than 5.5 million in 21 months – duplicate reporting would create significant challenges for I4C and law enforcement in India, including extending investigative review, creating the potential that valuable analytical information may be overlooked, and delaying action to investigate exploitation incidents and safeguard children.

While other countries have considered legal mandates to require U.S.-based online platforms to report directly to their local law enforcement agency, exceptions have been made when an online platform is reporting to NCMEC's CyberTipline.[1] This approach acknowledges the expediency of the existing system of reporting to the CyberTipline, the value derived from NCMEC's analytical contributions to CyberTipline reports, and the potential negative impacts of creating delays and redundancies by requiring dual reporting.

NCMEC welcomes the opportunity to support India's efforts to combat online child sexual exploitation through our operation of the CyberTipline. We respectfully request a direct dialogue with you to answer any questions you may have regarding NCMEC's CyberTipline and to discuss the reporting framework in India to ensure that child victims of sexual exploitation can be rescued and safeguarded.

Thank you for your consideration and your partnership.

Sincerely,

John Shehan

John Shehan
Senior Vice President, Exploited Children
Division and International Engagement

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[1] In the United Kingdom, Section 60 of the Online Safety Act 2023 required online platforms to report "detected and unreported" child sexual exploitation and abuse (CSEA) content to the National Crime Agency, however an exception was added in Section 70 for CSEA content that was reported by an online platform to a foreign agency exercising the function of receiving and disseminating reports relating to CSEA content (e.g., NCMEC). Similarly, in Brazil, a Presidential decree regarding the implementation of Law No. 15.211/2025 (Digital ECA), which was enacted in 2025, exempted online platforms from mandatory reporting to Brazilian authorities when the online platform is required to report to NCMEC's CyberTipline.