

Platform Accountability Document Review

April 2020



SUMMARY

In 2017, Democracy Fund began to address the role that trust, truth, mis/disinformation, and technology platforms play in American democracy and society and in 2019, it launched the Digital Democracy Initiative, a strategy “to hold platforms accountable to the American public and to advance America’s democratic promise.”

In the following brief, Democracy Fund’s evaluation and learning partner, ORS Impact, describes the current state of the platform accountability field, including the key actors; and the prevalent and emerging theories of change about how to hold platforms accountable.



ORSIMPACT

Missions Accomplished

1100 Olive Way, Suite 1350 | Seattle, WA

206-728-0474 | ors@orsimpact.com

.....Table of Contents

1	Introduction
1	<i>Methodology</i>
2	State of the Field
2	<i>Key Actors</i>
2	<i>Landscape</i>
4	<i>New Learning About Democracy Fund's Strategy</i>
12	Theories of Change for Holding Platforms Accountable
17	<i>Explanation of Different Theories</i>
24	<i>Considerations</i>
	Appendices and Endnotes
A-1	<i>Appendix A: Documents Reviewed</i>
A-7	<i>Appendix B: Full List of Named Actors</i>
A-10	<i>Appendix C: Platform Accountability Hypothesis Chains</i>
E-1	<i>Endnotes</i>



Introduction

In 2017, Democracy Fund began to address the role that trust, truth, mis/disinformation, and technology platforms like Facebook and Twitter play in American democracy and society.¹ The first two years were largely exploratory, involving fact-check training, experimental grants, open calls on mis/disinformation, and research. In 2019, Democracy Fund launched the Digital Democracy Initiative, a strategy “to hold platforms accountable to the American public and to advance America’s democratic promise.” The strategy has two streams of work (each with a set of tracks):²

1. **Platform Accountability**, to:
 - a. Advance data policy innovation within a human rights framework,
 - b. Strengthen transparency and oversight of mis/disinformation, and
 - c. Partner with platforms to support civic engagement.
2. **Media Policy**, to:
 - a. Shift the public interest media paradigm and
 - b. Explore early-stage research on platforms and polarization.

This brief addresses the Platform Accountability stream of work, which received the majority of 2019 and 2020 grantmaking dollars.³ In it, Digital Democracy Initiative’s evaluation and learning partner, ORS Impact, describes the current state of the platform accountability field and the prevalent and emerging theories of change about how to hold platforms accountable. The purpose of this brief is to synthesize the work that already exists, so that Democracy Fund can build off others in the field. It will inform the team’s ongoing evaluation and learning work.

Methodology

This brief summarizes findings from a review of 66 documents dated 2016–2020, including reports, articles, blog posts, meeting/conference summaries, and press releases. We collected documents from Paul Waters, Associate Director of the Public Square Program at Democracy Fund, and by reaching out to other key Democracy Fund partners. We requested documents that partners had been involved with or used in their work to include in our analysis of the state of the platform accountability field.

The documents are not exhaustive; rather, we prioritized the most useful and relevant documents in our analysis to inform Democracy Fund’s decisions about where to invest and evaluate/learn. As such, some documents were excluded because they lacked direct relevance to



the strategy—for example, we did not include reports about telecommunications companies or non-US, country-specific reports.

See Appendix A for a full list of documents included in our analysis.

State of the Field

Key Actors

Key actors in the platform accountability field include foundations, nonprofits, government/intergovernmental organizations, academia/research organizations, the platform companies themselves, and other for-profit businesses. The other crucial actors are users. In the case of Democracy Fund’s strategy, users of color, women, Muslims, and/or immigrants are of particular importance because of the disparate impacts they face from platform harms.

See Appendix B for a full list of non-platform actors referenced in the documents.

Landscape

In August 2018, Freedman Consulting, LLC (Freedman) released a landscape report, *Modern Platform Companies and the Public Interest: A Landscape of Harms and Accountability Efforts*,⁴ which sought to understand the state of the field around platforms and platform accountability. Collecting data through expert interviews and a review of relevant news articles, research papers, and public opinion research instruments, Freedman found the following capacities, gaps, and opportunities among public interest actors addressing platform accountability.⁵



Public Interest State of Play Findings

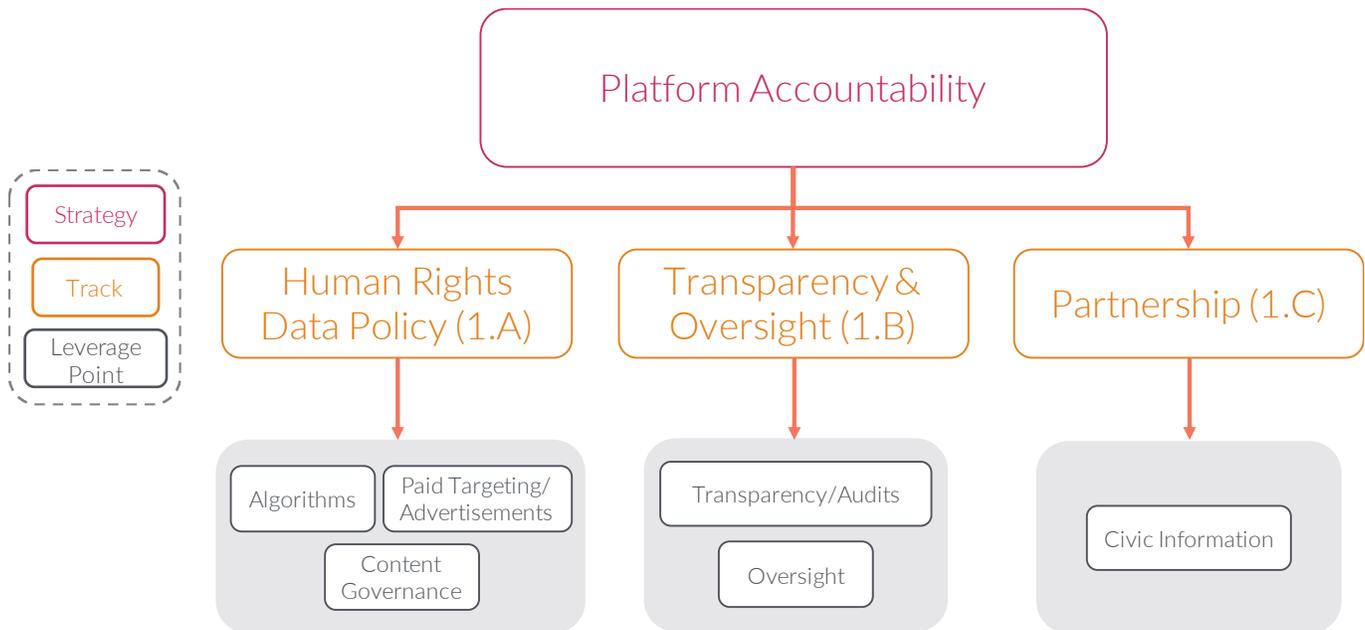
- 1. Appetite for accountability; coordination required:** While the public interest community is reacting to and engaging with platform accountability issues, efforts are sometimes duplicated or unevenly focused across issues, some interviewees suggested.
- 2. Mis/disinformation relatively more crowded:** Interviewees noted that this space was relatively crowded (in comparison to work on other platform challenges), and that it may be more important to prioritize coordinating current efforts before committing resources to new entities or events.
- 3. Platform opacity major barrier to action:** Limited platform transparency (concerning their data, policies, and decision-making) presents significant challenges for the public interest community as it lacks preliminary information needed to define core problems to later rally public support and identify solutions.
- 4. Company/public interest collaborations emerging:** Some public interest groups are beginning to cooperate with platforms and see value in working together on joint solutions, while others have expressed trepidation and emphasized fully independent accountability efforts.
- 5. New battle lines; potentially strained corporate alliances:** Upcoming battles around privacy, hate speech, algorithmic discrimination, and other contentious issues may put public interest groups at odds with companies that have previously been allies and/or funders; as a result, interviewees emphasized cultivating other funding streams, or in some cases, focusing on organizations that do not accept corporate funding.
- 6. Strong, relevant, existing infrastructure:** Platform accountability work may also require new supportive infrastructure, but interviewees frequently cited several examples of civil society tables and coalitions that work at the intersection of justice and technology that are well-suited to addressing certain platform accountability issues.
- 7. Many competing priorities:** As the public interest community grapples with addressing emerging platform issues, groups may need to reallocate resources away from traditional technology rights priorities or expand overall bandwidth to add platform issues to existing portfolios.
- 8. Economic and social platform work naturally siloed:** Some siloes are emerging around organizations that deal with economic and gig economy platforms that affect workers and markets, like Amazon or Uber, and those that work on social platforms that affect democracy and journalism, like Facebook and Twitter.
- 9. Shared long-term goals rare; some early goal-setting efforts underway:** Collective, wide-ranging, and long-term goals for holding platforms accountable were generally rare across interviews. However, a number of interviewees cited nascent or interim goals within specific issue areas that begin to articulate an affirmative vision for collective public interest goals.



..... New Learning about Democracy Fund’s Strategy

Building on Freedman’s work, ORS Impact pulled information from our document review that had relevance to the three Platform Accountability tracks, and explored Democracy Fund’s leverage points for each track. We begin our discussion of each track by defining Democracy Fund’s strategy, then summarize the relevant content from our document review. Figure 1 illustrates the three Platform Accountability tracks and their associated leverage points.

Figure 1 | Platform Accountability Tracks and Leverage Points



..... Human Rights Data Policy (Track 1.A)

The Human Rights Data Policy track seeks to advance data policy innovation within a human rights framework.⁶ Specifically, it will “support the enactment or adoption of policy and product changes by government and platforms within a human rights framework to create durable systems change in support of American democratic society.”⁷ Democracy Fund focuses its work on the harms that platforms cause people of color and women, recognizing the particular negative impacts they face while navigating platforms.⁸ This track’s leverage points include algorithms, paid targeting/advertisements, and content governance.



Leverage Point: Algorithms

Within its Human Rights Data Policy track, Democracy Fund is particularly interested in “the platforms' automated ability to discriminate against people of color and women through targeting of content” using algorithms.⁹ In their recent *Rights x Tech Research: Movement Report*, Sabrina Hersi-Issa and Arpitha Peteru underscore the particularly harmful effects of algorithms on people of color and other marginalized communities.¹⁰ They refer to the “aggressive silencing of activists, such as the treatment of Rohingya, Uighurs, indigenous activists, Muslim communities and racialized surveillance of primarily black, brown, and immigrant communities.”

Many documents detail the harmful effects of biased algorithms, including on ad delivery and political discourse,^{11,12} and hiring decisions and evaluations.¹³ Ruha Benjamin, in her book *Race After Technology*, argues that algorithms encode inequality “by explicitly amplifying racial hierarchies, by ignoring but thereby replicating social divisions, or by aiming to fix racial bias but ultimately doing quite the opposite.”¹⁴ Similarly, in their recent report, *Discriminatory Denial of Service: Applying State Public Accommodations Laws to Online Commerce*, the Lawyers' Committee for Civil Rights Under Law explain that, “if an artificial intelligence algorithm is trained on data tainted with systemic biases, it will incorporate, replicate, and regurgitate such biases.”¹⁵ Charlton McIlwain emphasizes the importance of racial formation theory in understanding how inequality shows up on the Internet.¹⁶ He clarifies that algorithms are agnostic tools, and:

“to fully understand how a technological system such as the Internet might produce tangible forms of race-based inequality, we must consider how the Internet developed as a part of a longstanding history and process of racial formation—the complex, racialized historical contexts, circumstances, interests and problems that predate, but may either be exacerbated or corrected by the web’s technological environment.”

Ranking Digital Rights (RDR) explains that “human rights violations can result from unclear rules and enforcement or poor transparency about who is allowed to advertise, to whom, and with what content.”¹⁷ For this reason, they updated their index ranking companies' disclosures and policies in 2019 to include indicators around companies' targeted advertising policies and practices, and their use of algorithms, machine learning, and automated decision making. To develop the indicators, RDR focused on four human rights risks: “algorithmic curation, recommendation and ranking systems; the use of algorithmic systems for content moderation...; violations of the purpose limitation principle; and algorithmic systems' vulnerability to automated manipulation efforts.”



Safiya Noble, author of *Algorithms of Oppression*, claims, “What we need now, more than ever, is public policy that advocates protections from the effects of unregulated and unethical artificial intelligence.”¹⁸ In 2019, Free Press Action and the Lawyers’ Committee for Civil Rights Under Law releases a proposed Online Civil Rights and Privacy Act, a comprehensive data-protection bill that:

“prohibits discrimination in economic opportunities and online public accommodations; prohibits deceptive voter suppression; requires audits for discriminatory processing; restricts unfair and deceptive practices; limits the use of personal data to disclosed and foreseeable purposes; grants individuals the right to access and control their own data; establishes clear and thorough transparency and security rules; and empowers robust enforcement at the individual, state and federal levels.”¹⁹

Beyond legislation, RDR emphasizes the role that investors can play in holding platforms accountable for their use of algorithms and artificial intelligence.²⁰ They point to the recent increase in shareholder resolutions on issues related to digital rights—from two in 2015 to 12 in 2019. Though none of the resolutions passed, RDR argues they “reflect a growing concern about the business impacts of tech companies’ failures to adequately understand and mitigate digital rights risks” and “increased coordination and organization among responsible investors, driven in part by the Investor Alliance for Human Rights.”

Two documents highlight major barriers to holding platforms accountable for their algorithms. First, according to a summary of the Accountable, Responsive, Inclusive, and Democratic Platforms meeting,²¹ participants pointed out that the judiciary may be a substantial barrier to structural change.²² They attribute this to “current interpretations of the First Amendment, which might categorize discriminatory algorithms employed by platforms as protected speech and prohibit certain efforts to moderate platform activities.” Second, the Stigler Committee on Digital Platforms explained that Section 230 of the Communications Decency Act signifies that platforms are not liable for promoting content, meaning they are not considered responsible for algorithmic bias.²³ Not only does this limit the possibility of holding platforms accountable, but it also favors platforms in competition with traditional media.

Leverage Point: Paid Targeting/Advertisements

Democracy Fund also considers the role of paid targeting/advertisements in Human Rights Data Policy, particularly “a user’s ability to discriminate against people of color and women through paid targeting of content.”²⁴ For example, a report by Upturn shows that “employers and vendors are using sourcing tools, like digital advertising and personalized job boards, to proactively shape their applicant pools.”²⁵ Predictive hiring tools like these can reflect institutional and systemic



biases. Moreover, a Stop Online Violence Against Women (SOVAW) report on the November 2020 election confirmed their earlier analysis²⁶ that “the past measures to suppress the votes of the Black community have neither been addressed nor slowed down,” and are impacting both presidential candidate and local campaigns.²⁷

Another Upturn report explains that some have argued for removing demographic features from algorithmic inputs entirely to mitigate discriminatory targeting. Upturn argues this “approach is flawed, however, because algorithms can effectively use omitted demographic features by combining other inputs that are each correlated with those features, potentially nullifying any protection from discriminatory effects.”²⁸ Indeed, recent research by Ali et al. shows that discrimination in ad delivery can arise independently of ad targeting.²⁹ As such, “to the extent limiting ad targeting features prompts advertisers to rely on larger target audiences, the mechanisms of ad delivery will have an even greater practical impact on the ads that users see.”

The Accountable, Responsive, Inclusive, and Democratic Platforms meeting summary also highlights the fact that “impacts fall disproportionately on people of color and other vulnerable communities, particularly around discriminatory ad targeting and hateful speech,” and at least one speaker argued that protecting these users should be a top priority.³⁰ However, the notes indicate that the group’s brainstorming around possible solutions to platform accountability more broadly did not result in proposed solutions specific to these users.

As previously mentioned, RDR’s update to its index included indicators around companies’ targeted advertising policies and practices. RDR’s goal in developing these indicators is to set global accountability and transparency standards for how platform companies that employ and profit from targeted advertising can respect human rights online.³¹ The proposed bill from Free Press Action and Lawyers’ Committee for Civil Rights Under Law would also address ad targeting by “[prohibiting] discrimination in economic opportunities and online public accommodations... [and] deceptive voter suppression.”³²

Leverage Point: Content Governance

Democracy Fund defines content governance as “creating policies to encourage civic dialogue, while adapting practices and removing content that have negative disparate impacts on people of color and women.”³³ In *Discriminatory Denial of Service*, the Lawyers’ Committee for Civil Rights Under Law explains that “when a user self-censors or quits an online platform after experiencing hateful harassment, that user is deprived of their equal right to enjoy the services offered by that business.”³⁴

Ellen Goodman explains, “as private entities, free from liability under Section 230 and from government regulation under the First Amendment, the platforms are left to regulate



themselves, and they have until recently declined to take this seriously.”³⁵ SOVAW further describes how “the tech and social media solutions offered in response to the post-election questions from Congress fail to adequately address either voter suppression or hate speech.”³⁶

In discussing anti-hate solutions, one speaker at the Accountable, Responsive, Inclusive, and Democratic Platforms meeting drew attention to the work of Change the Terms, a coalition that helps “major platforms change their terms of service to combat white supremacists and other hate groups, while providing a fair, consistent, and transparent platform with due process for all, including the vulnerable communities most directly affected by hateful activities.”³⁷ For example, Change the Terms and a nonprofit advocacy organization, Color of Change, are pressing Facebook “to adopt its recommendations for stronger policies against hate—with a particular eye on white supremacist content.”³⁸ MediaJustice and other organizations are engaged in similar work.

A study on Russian Twitter disinformation campaigns by Deen Freelon and Tetyana Lokot leads them to suggest cross-ideological engagement to combat disinformation and to call for platforms to do more than delete disinformation.³⁹ Since no one is immune to foreign disinformation, they argue that “members of different targeted groups could coordinate to identify and expose suspicious behaviors, perhaps by using private messaging tools.” They also explain that in addition to deleting disinformation, platforms should include disinformation education “to help users understand how politically polarizing and hostile messages are marshaled as nonpartisan weapons of information warfare, and perhaps even discourage them from circulating their own such messages.”

In some cases, private organizations and platform companies themselves are taking a role in content governance. Robert Gorwa notes that “a growing number of private organizations and initiatives have been created in an effort to shape corporate behavior through voluntary standards and transnational rules.”⁴⁰ Gorwa attributes this to the absence of global governance or effective international coordination for identifying and rooting out bad actors. Karen Kornbluh at the German Marshall Fund calls for platforms to make their content moderation rules transparent, suggesting regulation to “require certain platforms to provide due process protections for users whose content is taken down” and/or a change to Section 230 to “eliminate immunity for platforms that leave up content that threatens or intentionally incites physical violence.”⁴¹ The Electronic Frontier Foundation asserts that governments are calling for platform companies to police speech themselves, and companies are complying.⁴² Yet, through that work, companies are also censoring valuable speech: “While it is reasonable for companies to moderate some content, no one wins when companies and governments can censor online speech without transparency, notice, or due process.”



RDR’s call for investors to focus on and address platform governance issues also applies to content governance.⁴³ For example, they encourage shareholders to “look for efforts by companies to be accountable to users and affected communities despite the absence of clear regulation,” including making public how they formulate and enforce rules for user content.

..... Transparency & Oversight (Track 1.B)

The Transparency and Oversight track works “toward the goal of platforms providing data relevant to the public square and allowing independent data collection for newsgathering and research projects to inform the general public about matters of public concern.”⁴⁴ This track’s leverage points include transparency/audits and oversight.

Leverage Point: Transparency/Audits

Democracy Fund defines transparency/audits as a platform’s “willingness to ethically disclose civic data and internal processes.”⁴⁵ As previously mentioned, several organizations are working toward transparent platform policies:

- Change the Terms advocates for “a fair, consistent, and transparent platform with due process for all,” which includes combating white supremacy.⁴⁶
- RDR’s index “has contributed to improved company disclosure of policy and practice across a number of areas, including transparency reporting.”⁴⁷
- Free Press Action and the Lawyers’ Committee for Civil Rights Under Law’s model bill for Online Civil Rights and Privacy advocates for relevant entities to make information about their privacy policies available in an accessible and easy-to-understand manner, and for platforms to release an annual privacy report that includes the types of personal information that are processed and how they obtain that data.⁴⁸

In their policy brief, the Stigler Committee on Digital Platforms makes several recommendations relevant to transparency.⁴⁹ First, they contend that:

“Congress should empower the [Federal Trade Commission] to: (1) have access to [platforms’] internal databases and studies, (2) perform their own independent research on how platforms impact different areas of our society, and (3) moderate independent researchers’ access to these databases.”

To understand how platforms act as political agents, the brief also calls for new disclosure obligations, including:

- **non-neutrality**, meaning platforms should disclose when they voluntarily adopt non-neutral content moderation policies;



- **relationship with politicians**, meaning platforms should disclose when they provide specific support or technical assistance to political parties, candidates, or interest advocacy groups, and;
- **academic funding**, meaning platforms should disclose their funding to academia and relationship(s) with academics.

Transparency of political ads on platforms, especially sponsor attribution, is another area garnering attention. With no mandate to publicly disclose the contact information or name of the organization sponsoring political ads on platforms—as is required of political ads on TV or radio—it has become “extremely easy” to obscure ad sponsors from users and researchers.⁵⁰ To address this, Karen Kornbluh advocates for legislation like the Honest Ads Act, which would “apply television’s rules on disclosing the funding behind political advertising to the Internet” to ensure sponsor attribution.⁵¹

To better understand the effect of political ads on platforms, researchers at NYU’s Online Political Ads Transparency Project are urging platforms to be more transparent and thorough about different ad metrics, including ad content and targeting information.⁵² Through their research, they have found that “many of the issues with [political ad] archives likely stem from a combination of their hasty creation and the fact that the platforms are still working out how to improve security.”⁵³ They “call on these organizations to re-architect their platforms and policies to support full transparency of all political ads.”

Leverage Point: Oversight

Democracy Fund describes oversight as “the ability to conduct independent journalism and research on platforms for public consumption and in the public interest.”⁵⁴ For instance, speakers at the Accountable, Responsive, Inclusive, and Democratic Platforms meeting recognized the need for structural changes around control of information.⁵⁵ An analysis of “who controls the flow of information, how that control impacts democracy, and on what terms can people enter the platform” was recommended. Both private (i.e., platforms themselves) and public (i.e., regulators) oversight were suggested as necessary.

Likewise, when the Stigler Committee on Digital Platforms recommends that regulators should have access to platforms’ internal databases, they also call for regulators to mediate access for third parties, such as independent researchers: “Regulators can then ensure that a small but significant anonymized sample is made available for a larger use, depending on the trade-off between re-identification risks and the gains from openness.”⁵⁶



In their summary of the Rise of Platforms conference, Kirsten Adams and Bridget Barrett describe a panel about the trajectory of the field of research on platform accountability.⁵⁷ Panelists pointed out that while transparency typically refers to quantitative data and content, researchers “[do] not want more big data—they [want] transparency surrounding (and especially qualitative data on) platform processes that directly influence democratic norms and ideals.” Similarly, as Claire Wardle at First Draft News notes, even if researchers use Twitter’s data, thorough research would not be possible “as some of the enforcement would not be visible via the public API.”⁵⁸ Simply put, researchers want to understand how platforms make content moderation decisions and what factors influence those decisions.

Beyond regulation, oversight of platforms also has the potential to include solutions-oriented research that institutional or political factors prevent platforms from conducting themselves. Nic Dias at First Draft News argues that research institutions “can act as honest brokers between stakeholders,” and that cooperation between researchers and platforms would “allow them to fully benefit from each other’s expertise, and to pool resources in incredibly powerful ways, like cross-platform databases.”⁵⁹ For effective oversight to occur, however, platforms first need to establish, through their terms of service, a “safe harbor” for public interest journalists and researchers. In a letter to Facebook’s leadership, Jameel Jafar and Alex Abdo at the Knight First Amendment Institute propose that Facebook amend its terms of service to enable “certain kinds of journalism and research while appropriately protecting the privacy of Facebook’s users and the integrity of Facebook’s platform.”⁶⁰

..... Partnership (Track 1.C)

The Partnership track of the Digital Democracy Initiative “will work to build opportunities for the public, grantees, and partners to benefit from the scale provided by platform adoption of the civic tools and interventions.”⁶¹ Although there was substantially less content relevant to this track in the document review, one author, Taylor Owen, called for “a coordinated and comprehensive response from governments, civil society, and the private sector.”⁶² There is an understanding that coordination strengthens the work, but not much has been written about how to do it.

Leverage Point: Civic Information

Civic information, the key leverage point of the Partnership track, is defined as platforms’ “ability to provide civic information through their service or in partnership with others.”⁶³ We did not find content in our document review relevant to this work.



Theories of Change for Holding Platforms Accountable

There are a variety of theories in the field, most of them implicit, about how to hold platforms accountable. In our document review, 39 out of 66 documents included some discussion that allowed us to pull out the authors' underlying theories about how to get there.

In this section, we describe 11 theories organized into four categories:

 Regulatory Change

 Civil Rights

 Pressure

 Research

These theories largely are not in conflict with one another; rather, they rely on different (and in many cases, complementary) entry points for holding platforms accountable. Table 1 on the following pages summarizes the 11 theories and the assumptions underlying them. The sections following the table provide more detail about each theory, followed by our analysis.



Table 1 | Summary of Platform Accountability Theories of Change

Theory	Impact	How to Get There	Assumptions Underlying the Theory	Sources
 Regulatory Change				
Competition	Increased competition between platform companies	Interoperability; non-discrimination; merger review; antitrust reform	<ul style="list-style-type: none"> The status quo is insufficient, more competition is needed Government intervention is necessary to promote competition 	Gene Kimmelman; Ellen Goodman; Philip Verweer
Consumer protection	Increased protection—privacy and otherwise—for users	<ul style="list-style-type: none"> Interim measure: Federal Trade Commission’s (FTC) Section 5 jurisdiction Long-term: regulation, including the same public interest regulatory framework that applies to broadcast media, a new regulatory agency, and/or a new information consumer protection framework 	<ul style="list-style-type: none"> Achieving substantial legislative change will take time Consumer protection will tackle market monopolies and abuses, and address and mitigate information asymmetries Consumer protection should be sufficiently broad to cover a wide range of consumer interests Aggregate user data is a public resource 	Gene Kimmelman; Philip Verweer; Ellen Goodman and Ryan Whittington; Philip Napoli; Karen Kornbluh; Jonathon W. Penney
Required investment	Platforms internalize the cost of their harms	Tax, fine, or other form of required investment	<ul style="list-style-type: none"> Platforms underinvest in the prevention or mitigation of their harms (similar to the global financial system a decade ago) The public individually and collectively bears the risks and costs of platform business models Many platforms operate as, or close to, monopolies 	Philip Verweer; Stigler Committee on Digital Platforms



Theory	Impact	How to Get There	Assumptions Underlying the Theory	Sources
 Civil Rights				
Legislation	Online discrimination is explicitly prohibited	Data-protection legislation that combats civil rights harms from platform privacy practices	<ul style="list-style-type: none"> Existing civil rights law focuses on harms in brick-and-mortar locations, but it was never intended to omit platforms Six states do not have any law generally prohibiting either online or offline discrimination in public accommodations; most states would benefit from clarifying their public accommodations laws to explicitly prohibit online discrimination 	Safiya Noble; Free Press Action; Lawyers' Committee for Civil Rights Under Law
Legal Recourse	Private lawsuits to claim civil rights violations on platforms are allowed	Updates to state laws to give targets of civil rights violations on platforms the possibility of legal recourse	<ul style="list-style-type: none"> When states do not explicitly allow legal recourse for civil rights violations on platforms, the application of public accommodation statutes depends on whether: <ul style="list-style-type: none"> the law requires a place of public accommodation to be a physical place state courts will defer to decades-old decisions that did not account for the Internet 	Lawyers' Committee for Civil Rights Under Law
 Pressure				
Movement building	People demand that the software products they use and support, and the companies that make these products and services, are more ethical	People, including software developers, consider how technology and platforms can enhance society and the communities they could harm; responses by the media, political campaigns, and activists to	<ul style="list-style-type: none"> Solutions and countermeasures offered by platforms to date have been both insufficient and ineffective Software developers are incentivized to get products out to market as quickly as possible, which makes assessing the societal impact of the technology difficult 	Stop Online Violence Against Women; Ruha Benjamin



Theory	Impact	How to Get There	Assumptions Underlying the Theory	Sources
		counter efforts to harm people of color and women		
Public ranking	Platform companies improve disclosures and policies	Transparency of public rankings leads to accountability in both platform companies and the governments that regulate them	<ul style="list-style-type: none"> Improved disclosures and policies prevent and mitigate threats to users’ right to privacy and freedom of expression Platforms will change in response to public rankings not only to protect their reputation, but to act as stewards of and conduits for their users Ripple effects of public rankings will affect investors, policymakers, and activists 	Ranking Digital Rights
Investor pressure	Platforms change their practices in response to investor pressure	Investor due diligence, including asking about targeted advertising and algorithmic systems and company efforts to respect users’ rights	<ul style="list-style-type: none"> CEOs and boards need to take responsibility for their business models There is growing investor concern about platform harms, evidenced by an increased number of shareholder resolutions (none passed) The outlook for further investor pressure relies on whether: <ul style="list-style-type: none"> – companies respond to investor concerns – the SEC increases the threshold of shareholder support required for inclusion in proxy materials 	Ranking Digital Rights
Transparency	Platforms are more honest with and accountable to the public	Ad transparency; predictive hiring transparency; oversight bodies (e.g., social media councils, Facebook’s Oversight Board)	<ul style="list-style-type: none"> Transparency allows users to help platforms identify bad actors and to track platforms’ progress to police themselves Transparency is an “interim” solution; it does not solve the structural problems inherent in platform business models 	Upturn; Kate Klonick; Ellen Goodman; Heidi Tworek



Theory	Impact	How to Get There	Assumptions Underlying the Theory	Sources
 Research				
Research	Wider, more thoughtful and expert-driven conversation about platform accountability and policy	The development of knowledge about how platforms have transformed the conditions of an informed society; recommendations for improving our ability to produce, distribute and consume reliable, trustworthy information; development and collation of tools for users to be more discerning	<ul style="list-style-type: none"> • There is increasing disagreement about facts and data, declining trust in institutions • There is no consensus on the norms, rights, and responsibilities that should govern platforms • The challenge(s) of platforms will continue to evolve; new knowledge can prove durable 	Knight Foundation; Social Science Research Council; RAND Corporation
Partnership	Recommendations generated from third-party researchers are implemented by platforms	Relationships and partnerships between platforms and third-party researchers who mutually benefit to produce solutions-oriented research	<ul style="list-style-type: none"> • There are trusted research institutions that platforms are comfortable working with • Trust between platforms and institutions will lead to more comprehensive and thorough data for researchers to use • There is an incentive for platforms to partner with and implement the recommendations generated by third-party researchers • Public interest journalism and research on platforms should be free from the threat of legal sanction 	Online Political Ads Transparency Project; First Draft News; Knight First Amendment Institute



Explanation of Different Theories

Regulatory Change

A number of documents propose regulatory solutions as a way to hold platforms accountable. The specific proposals vary, but can generally be grouped around promoting competition, protecting consumers, and requiring investments.

Theory: Competition

Gene Kimmelman argues for platform accountability through government intervention to promote competition.^{64,65} He proposes four paths a regulator can use to address competition among platforms:

- **Interoperability:** Requiring dominant platforms to be interoperable with one another and other services, so competitors can offer customers access to the dominant network
- **Non-Discrimination:** Monitoring, and where necessary banning, discrimination by platforms with bottleneck power favoring their own services over competitors; banning ‘take it or leave it’ contract terms
- **Merger Review:** Reviewing and blocking mergers (in parallel with antitrust agencies), based on a different standard that places a higher burden on dominant platforms to demonstrate overall benefits to society; assessing mergers involving platforms with bottleneck power, and only allowing mergers that expand competition; reviewing all mergers (i.e., no size limit for mergers)
- **Antitrust Reform:** Working together with regulation, more stringent enforcement; relaxing proof requirements imposed on plaintiffs in some circumstances and reversing the burden of proof in others

Kimmelman states there is not enough competition in the status quo and regulatory interventions should encourage more. He argues that the regulator needs to “actively promote competition, not simply... maintain existing competition.” Ellen Goodman agrees, arguing that structural regulations to foster competition are better than “content-based regulation that seeks to change the behavior of platforms with respect to certain classes of information (e.g. reducing hate speech and increasing verified journalism).”⁶⁶

Discussing contemporary competition law (i.e., antitrust), Philip Verveer agrees with Kimmelman that existing law is insufficient for holding platforms accountable.⁶⁷ He argues that alternatives are likely be more attractive, unless “there is a clear, aggravated case of material harm to



innovation and a promising approach to alleviating the problem, most likely through some form of forced corporate restructuring.” He does not address potential reforms as Kimmelman does.

Theory: Consumer Protection

Theories around protecting consumers through regulation range from temporary fixes, like using an interim measure, to the application of either existing or new regulatory frameworks.

Philip Verveer proposes using the Federal Trade Commission’s (FTC) “Section 5 jurisdiction over ‘unfair ... acts or practices affecting commerce’” to protect consumers as an “interim measure.”⁶⁸ While not a fix-all, he acknowledges that achieving substantial legislative change will take time and encourages the use of this “existing arrangement” in the interim. Kimmelman also addresses consumer protection in his calls for a new regulator to address competition, though he does not provide much detail: “The new regulator should also be responsible for consumer protection regulations relating to digital platforms, such as privacy protections for users.”⁶⁹ Ellen Goodman and Ryan Whittington call for reforms that “incentivize responsible and transparent platform governance” without dictating which categories of content should be banned from the Internet or creating publisher licensing schemes.⁷⁰

Philip Napoli makes a legal argument that platforms should be regulated by a public interest regulatory framework because aggregate user data is a public resource, akin to the regulations imposed on broadcast media.⁷¹ Karen Kornbluh also calls for updating existing rules to fit the online world.⁷²

On the more transformational side, Jonathon W. Penney proposes developing a new information consumer protection framework that will “empower users to better judge the quality and integrity of information on platforms.”⁷³ Penney claims information consumer protection is the right regulatory framework because:

- it will tackle market monopolies and abuses;
- it will address and mitigate information asymmetries;
- it is sufficiently broad to cover a wide range of information consumer interests; and
- it can be global and thus take advantage of existing legal, regulatory, and government infrastructure around the world.

Theory: Required Investment

In a separate article, Verveer proposes requiring platforms to devote greater resources to prevention and mitigation.⁷⁴ He describes platforms’ current underinvestment in these areas as



“a form of risk-taking for profit, just as surely as was the reckless financial firm conduct that nearly brought down the global financial system a decade ago.” He goes on to explain that, “the less spent on prevention or mitigation, the more that flows to the bottom line, with the public individually and collectively made to bear risks and costs more appropriately and more efficiently kept within the enterprise.” As such, he argues that requiring platforms to invest in limiting their harms will force them to internalize the costs incurred through their business.

The Stigler Committee on Digital Platforms also considers the imposition of fiduciary duties.⁷⁵ Since some platforms operate as near monopolies, the committee suggests they may have a “fiduciary duty toward society.”

Civil Rights

Several authors from our document review see opportunities to hold platforms accountable through civil rights legislation and/or legal recourse.

Theory: Legislation

Safiya Noble calls for “public policy that advocates protections from the effects of unregulated and unethical artificial intelligence.”⁷⁶ Free Press Action and the Lawyers' Committee for Civil Rights Under Law intend to “[combat] civil-rights harms from the invasive privacy practices of tech and big data companies” through their proposed legislation (described previously).⁷⁷ They acknowledge that our existing civil rights laws address harms in “brick-and-mortar commerce,” but claim that “these laws were never intended to omit the digital public square.”

In *Discriminatory Denial of Service*, the Lawyers' Committee for Civil Rights Under Law calls for explicitly prohibiting discrimination online, including digital redlining and data-driven segregation.⁷⁸ They explain that, “Six states do not have any law generally prohibiting discrimination in public accommodations—online or offline. These states should enact new legislation. Most states would benefit from clarifying their public accommodations laws to explicitly prohibit online discrimination.”

Civil Rights: Legal Recourse

In terms of a legal option, the *Discriminatory Denial of Service* report states that “most states allow private lawsuits to vindicate civil rights violations” and calls for other states to update their laws to give everyone the possibility of legal recourse.⁷⁹ For states that have not directly addressed the legal question, the application of public accommodation statutes to platforms “depends on whether the state requires a place of public accommodation to be a physical place...



and whether the states’ courts are likely to defer to archaic decades-old decisions that may no longer make sense in the era of the Internet.”

Pressure

Some theories of change rely on the public pressuring platforms to change their practices. These pressure theories include movement building, public ranking, investor pressure, and other transparency efforts.

Theory: Movement Building

Movement building theories often prioritize creating change for groups particularly impacted by platform harms, including people of color and women. SOVAW believes its theory will “stem—although not stop—the forces from outside and inside the country, who’s (sic) intent is to target Black voters.”⁸⁰ They clarify that solutions and counter-measures offered by platforms to date have been both insufficient and ineffective. Rather, they lay out eight recommendations for media, political campaigns, and activists interested in countering efforts to suppress Black voters:

1. Acknowledge disinformation campaigns instead of denying they exist.
2. Counter the disinformation narratives with facts and do it often.
3. Have a focused disinformation arm whose only purpose is to monitor, track, and counter disinformation.
4. Work with data scientists who are collecting data on disinformation.
5. Ensure you have contacts of those who can verify whether an issue or community debate is understood.
6. Put together diverse teams to work on disinformation, and make sure they are listening to the input of targeted communities.
7. Employ an expert with a keen understanding about the ease with which people believe false narratives and how reflexive control is currently being weaponized domestically.
8. Employ culturally competent staff.

Ruha Benjamin also suggests that people power can change platforms and the discriminatory designs that encode inequality. In *Race After Technology*, Benjamin claims that “questioning the underlying value of any given piece of technology should be part of the design process” and that “software developers need to think both about how their systems can enhance society and the communities their software could harm.”⁸¹ She notes, however, that software developers are



incentivized to get products out to market as quickly as possible, which makes assessing the societal impact of the technology difficult.

Nonetheless, Benjamin explains that she has “seen a growing movement in the technology industry for employees to push their organisations to think about the broader implications of projects for surveillance and military tech,” citing Google’s decision to not renew its contract to develop artificial intelligence for the US military after worker protests. She “believes people will demand that the software products they use and support, and the companies that make these products and services, are more ethical.”

Theory: Public Ranking

RDR’s work relies on public rankings for their theory of change. Their approach is to provide “an effective roadmap for companies to improve policies and disclosures in order to prevent and mitigate a range of threats to users’ rights to privacy and to freedom of expression.”⁸² They believe that the transparency of their rankings is central to the accountability they seek in both platform companies and the governments that regulate them.⁸³

According to their published theory of change, RDR’s end goal is that

“Companies improve disclosures and policies in response to their RDR Index results. They do this not only because it is necessary for their reputation in the media, but to demonstrate that they are acting in good faith as stewards of and conduits for their users’ speech, knowledge, private information, and communications.”⁸⁴

RDR hopes that its direct work will have ripple effects by informing the work of others in the field, including investors (conducting due diligence on portfolio risk), policymakers (establishing regulatory frameworks), and activists (promoting alternative business models and mitigating human rights harms).⁸⁵

Theory: Investor Pressure

Building on its public ranking theory, RDR also sees opportunities for investor pressure to hold platform companies accountable. They believe most platforms, to date, have “focused on legal compliance and lobbying to shape further regulation,” rarely acting proactively in their response.⁸⁶ As such, RDR asserts that “CEOs and boards need to take responsibility for the human rights risks and negative social impacts associated with their business models” and encourages investors to “look for tech companies that understand how human rights standards build trust.” Concretely, RDR offers questions for investors to ask during their due diligence, including



questions around targeted advertising and algorithmic systems, and whether companies are making adequate efforts to respect users' rights.

RDR sees proof of growing investor concern in the increased number of shareholder resolutions mentioned previously in this brief. They claim that the outlook for further investor pressure relies on “whether companies are able to convince shareholders to withdraw some proposals by responding satisfactorily to concerns, and whether the SEC succeeds in increasing the thresholds of shareholder support required for inclusion in proxy materials.”

Theory: Transparency

Theories around transparency mention ads, the use of predictive hiring tools, and oversight bodies. In their May 2018 report, Upturn calls for Facebook to undertake an ad transparency effort that goes beyond labelling.⁸⁷ Broad ad transparency, Upturn claims, “should allow the public to both investigate known issues—ranging from consumer predation to illegal discrimination to misinformation—and to identify new ones.” They suggest this would allow users to help Facebook identify bad actors, and allow the public to track Facebook’s own progress to police its platform.

In a report on predictive hiring, Upturn calls for both vendors and employers to be more transparent about their predictive tools, and to allow independent auditing of those tools.⁸⁸ They explain that, “without this level of transparency, regulators and other watchdogs have no practical way to protect jobseekers or hold responsible parties accountable.”

Other transparency theories of change refer to oversight opportunities. Writing about Facebook’s Oversight Board, Kate Klonick explains that although the board can recommend (but not mandate) policy changes, Facebook is required to explain why it does or does not follow the recommendation.⁸⁹ Klonick claims that the this transparency and the associated public pressure create an indirect level of accountability: “While not perfect, this arrangement allows the public much more access and influence over content moderation policy than users have ever had before.” Ellen Goodman notes that Facebook should require “tribunals [to] release written decisions with their reasons so that we can begin to have a public ‘common law’ on Facebook as speech regulator.”⁹⁰

Related, Heidi Tworek calls for social media councils, “a new type of institution, a forum to bring together platforms and civil society, potentially with government oversight.”⁹¹ They would “provide regular, consistent meetings to answer pressing questions, discuss content moderation standards, and push for further transparency from social media companies.” These councils are intended as another interim solution to begin addressing the problem of content moderation; they do not solve the structural problems inherent in existing platform business models.



Research

Theory: Research

In 2019, Knight Foundation announced \$50 million in funding to develop new research around technology’s impact on democracy.⁹² In response to the lack of consensus about the norms, rights, and responsibilities that should govern platforms, their investment is

“intended to support the development of knowledge about how digital technology has transformed the conditions of an informed society, and to provide recommendations for improving our ability to produce, distribute and consume reliable, trustworthy information.”⁹³

Their theory of change is that this research and the associated recommendations will “enable a wider, more thoughtful and expert-driven conversation at an urgent moment in our republic,” proving durable as the challenge(s) of platforms continue to evolve.^{94, 95}

Similarly, the Social Science Research Council’s MediaWell initiative tracks, curates, and distills the latest research about the mechanisms and effects of digital mis- and disinformation.⁹⁶ The core component of MediaWell is a series of “live” research reviews: periodically updated summaries of the latest research findings, written for an educated but non-specialist audience. In addition, the site features in-depth reflections from a diverse array of experts about the state and trajectory of the field; an aggregation service linking to relevant news, analysis, and commentary; a Zotero library of citations on disinformation research; a directory of scholars working in this space; and a calendar of events related to online mis- and disinformation.

RAND Corporation’s Truth Decay initiative is also about conducting research to help increase the use of facts, data, and analysis in political and civil discourse and the policymaking process.⁹⁷ RAND points out four trends that characterize truth decay: “increasing disagreement about facts and data, blurring of the line between opinion and fact, increasing relative volume of opinion compared to fact, and declining trust in institutions.”⁹⁸

Theory: Partnership

There is an emerging theory that mis/disinformation researchers and academics, through thoughtful cooperation with platforms, can more directly “benefit the development of effective, short-term responses to disinformation.”⁹⁹ In this partnership theory, third-party researchers could overcome the institutional and political barriers that platforms face in exploring certain research questions. Since researchers are more likely to be perceived as honest brokers, their



solutions have the potential to influence multiple platforms; their findings and suggestions will be viewed as unbiased, potentially overcoming competitive frictions within the sector.¹⁰⁰

In practice, researchers at NYU’s Online Political Ads Transparency Project have been working with platforms on their transparency efforts. For instance, they “provide a concrete list of suggestions that would likely make [political ad archives] more robust and useful” and “are actively working with each archive product team to improve their implementations.”¹⁰¹

The “safe harbor” proposal from Jameel Jafar and Alex Abdo at the Knight First Amendment Institute also encourages a type of partnership, where Facebook amends its terms of service to enable access to public interest journalists and researchers.¹⁰²

Other Theories

Other one-off theories of how change happens showed up in the document review, but we do not delve into them here because they are less relevant to Democracy Fund’s strategy. These other theories have to do with the development, implementation, and impact of a global governance framework and managing the innovation process itself, rather than managing the risks of technological products.

Considerations

Alignment with Democracy Fund

Our document review shows that the work happening in the platform accountability field and the associated theories of change are aligned to some extent with Democracy Fund’s hypotheses about how to arrive at the full and equal enjoyment of platforms (see Appendix C for full hypothesis chain). The pressure and research theories align well with Democracy Fund’s overall Platform Accountability hypothesis around creating change through pressure and influence campaigns. The civil rights and regulatory change theories align generally with Democracy Fund’s Human Rights Data Policy hypotheses, where they support advocacy and research to change platform policies and functionality, and assume that advocacy and research will persuade government and corporate actors to protect people of color and women.

Related, Democracy Fund’s hypotheses emphasize changed platform experiences for people of color and women. Many of the theories either do not mention people of color and women specifically or do so only to acknowledge disparate impacts. The three exceptions are the movement building theory and the legislation and legal civil rights theories. Related, RDR’s two



theories—public ranking and investor pressure—emphasize the impact of platforms on human rights, which aligns with Democracy Fund’s approach.

..... Tensions

As mentioned earlier, the theories of change are not necessarily in conflict with one another. Though they rely on different entry points, they all work toward the same goal of holding platforms accountable. Nonetheless, some tensions arise when considering the full suite of theories. These tensions should be considered and managed in future conversations and decisions about the best way to achieve change:

- **Platform motivated vs. government enforced:** The pressure theories rely on the assumption that platforms will change themselves, whether in response to public pressure or for some other reason. In contrast, the regulatory change theories assume that platforms will never adequately police themselves, making government intervention necessary. The research partnership theory offers a third way—one where platforms are motivated to minimize harms and look for support to do so from academia and other researchers, who push them to go farther and/or be more comprehensive, where possible.
- **Near-term, interim efforts vs. long-term structural change:** Some theories—Verveer’s proposal to use Section 5 and Tworek’s social media councils—focus on addressing and mitigating the harms platforms cause to society in the short term. While they acknowledge the need for longer term changes as well, they offer temporary fixes. Other theories—most regulatory change—take a longer view and attempt to change the structures that have allowed platforms to operate as they have to date. These theories expect change to be slower, but the impact to be more transformational. Theories around research are different because they focus on clarifying how the harms show up, including both their tangible and intangible impacts, as well as their causes and potential solutions.
- **Centering people of color and women vs. “lifting all boats”:** Regulatory theories do not leave much room to prioritize people of color and women; they function within a “lift all boats” mentality, though they may have disparate impacts on people of color and women due to the disparate harms they face on platforms. In comparison, civil rights, pressure, and research theories offer ample opportunity to prioritize people of color and women, and in fact require their involvement and leadership to be effective (e.g., leadership of people of color and women in oversight, social media councils, etc.).
- **Limited availability of actors, resources, and effort:** While the theories are not in direct conflict, there are limited actors, resources, and efforts with which to address



platform accountability. This means that decisions about which entry point will be most effective, and what effectiveness looks like, are still important and contentious.

..... Closing Thought

This brief has summarized the prevalent and emerging theories of change within the platform accountability field as of February 2020. As the field continues to develop, we expect new literature and more-developed theories to be released on a regular basis. Nonetheless, this brief offers a snapshot of the field at this point in time. We hope the content informs Democracy Fund and the field’s thinking and planning for 2020 and beyond. We look forward to our continued learning and engagement.



Appendices

Appendix A: Documents Included in Review

Source (Org)	Type	Source (Author)	Title	Year Published
Center for International Governance Innovation	Article	Taylor Owen	Introduction: Why Platform Governance?	2019
	Article	Joan Donovan	Navigating the Tech Stack: When, Where and How Should We Moderate Content?	2019
	Article	Susan Etlinger	What's So Difficult About Social Media Platform Governance?	2019
	Article	Robert Fay	Digital Platforms Require a Global Governance Framework	2019
	Article	Michel Girard	Global Standards for Digital Cooperation	2019
	Article	Robert Gorwa	Regulating Them Softly	2019
	Article	Gene Kimmelman	Syncing Antitrust and Regulatory Policies to Boost Competition in the Digital Market	2019
	Article	Kate Klonick	Does Facebook's Oversight Board Finally Solve the Problem of Online Speech?	2019
	Article	Sean McDonald	The Fiduciary Supply Chain	2019
	Article	Jonathon W. Penney	Protecting Information Consumers	2019
	Article	Karine Perset, Jeremy West, David Winickoff and Andrew Wyckoff	Moving "Upstream" on Global Platform Governance	2019
	Article	Victor Pickard	Public Investments for Global News	2019
Article	Heidi Tworek	Social Media Councils	2019	

Source (Org)	Type	Source (Author)	Title	Year Published
	Article	Damian Tambini	Rights and Responsibilities of Internet Intermediaries in Europe: The Need for Policy Coordination	2019
	Article	Nanjala Nyabola	Platform Governance of Political Speech	2019
Center for Media and Social Impact	Report	Deen Freelon, Charlton D. McIlwain, and Meredith D. Clark	Beyond the hashtags: #Ferguson, #Blacklivesmatter, and the Online Struggle for Offline Justice	2016
Change the Terms	Article	Dell Cameron	Facebook's Sheryl Sandberg Hears Concerns of Civil Rights Leaders But Offers No Promises	2019
Computer Weekly	Article	Cliff Saran	Interview: Ruha Benjamin, Author, Race After Technology	2019
Data & Society	Article	Data & Society	Media Manipulation: Efforts To Exploit Technical, Social, Economic And Institutional Configurations of Media can Catalyze Social Change, Sow Dissent, and Challenge The Stability of Social Institutions	N/A
Digital Equity Laboratory	Report	Maya Wiley, Greta Byrum, Michelle Ponce, Oscar Romero	Take It or Leave It: How NYC Residents Are Forced to Sacrifice Online Privacy for Internet Service	2018
Electronic Frontier Foundation	Blog	Andrew Crocker, Gennie Gebhart, Aaron Mackey, Kurt Opsahl, Hayley Tsukayama, Jamie Lee Williams, and Jillian C. York	Who Has Your Back? Censorship Edition 2019	2019
Freedman Consulting	Report	Freedman Consulting	Modern Platform Companies and the Public Interest: A Landscape of Harms and Accountability Efforts	2018
	Other	Freedman Consulting	Notes and Key Themes from April 10 Accountable, Responsive, Inclusive, and Democratic Platforms Meeting	2019

Source (Org)	Type	Source (Author)	Title	Year Published
Free Press and Lawyers' Committee for Civil Rights Under Law	Press Release		Free Press Action and Lawyers' Committee for Civil Rights Under Law Release Proposed 'Online Civil Rights and Privacy Act' to Combat Data Discrimination	2019
German Marshall Fund	Policy Brief	Ellen Goodman, Ryan Whittington	Section 230 of the Communications Decency Act and the Future of Online Speech	2019
	Report	Karen Kornbluh	The End of Techno-Utopianism	2019
	Policy Brief	Ellen Goodman	The First Amendment Opportunism of Digital Platforms	2019
Harvard Kennedy School: Shorenstein Center on Media Politics and Public Policy: Digital Platforms & Democracy	Report	Philip Verveer	Platform Accountability: An Interim Measure	2019
	Article	Philip Verveer	Countering Underinvestment in Prevention by Platform Companies	2019
	Article	Gene Kimmelman	The Right Way to Regulate Digital Platforms	2019
	Report	Philip Verveer	Platform Accountability and Contemporary Competition Law: Practical Considerations	2018
	Article	Philip Verveer	Countering Negative Externalities in Digital Platforms	2019
Information, Communication & Society	Article	Charlton McIlwain	Racial Formation, Inequality and the Political Economy of Web Traffic	2016
First Draft News	Article	Claire Wardle	Assessing Current Efforts by the Platforms and their Effectiveness	2018
	Article	Nic Dias	How Academics Can Help Platforms Tackle Disinformation	2018

Source (Org)	Type	Source (Author)	Title	Year Published
Knight First Amendment Institute	Press Release	Knight First Amendment Institute	Knight Institute Calls on Facebook to Lift Restrictions on Digital Journalism and Research	2018
Knight Foundation	Press Release	Knight Foundation	Knight Invests \$50 Million to Develop New Field of Research around Technology's Impact on Democracy	2019
	White Paper	Erika Fowler, Talia Stroud	Thinking Strategically About Informing the Public on Complex Issues	2018
	Blog	Sam Gill	America's Digital Dilemma: Is Technology Harming Our Democracy?	2019
	Blog	Sam Gill	Strengthening Democracy in the Digital Age: Knight's \$50 million Investment in a New Field of Research	2019
Lawyers' Committee for Civil Rights Under Law	Report	David Brody & Sean Bickford	Discriminatory Denial of Service: Applying State Public Accommodations Laws to Online Commerce	2020
Misinformation Review	Article	Deen Freelon and Tetyana Lokot	Russian Twitter Disinformation Campaigns Reach Across the American Political Spectrum	2020
New York University: Online Political Ads Transparency Project	Article	Laura Edelson, Shikhar Sakhuja, Ratan Dey, and Damon McCoy	An Analysis of United States Online Political Advertising Transparency	2019
Policy and Internet	Article	Philip Napoli	User Data as Public Resource: Implications for Social Media Regulation	2019
RAND	Other	RAND	Fighting Disinformation Online: A Database of Web Tools	2019
Ranking Digital Rights	Report	RDR	Transparency and Accountability Standards For Targeted Advertising and Algorithmic Decision-Making Systems	2019

Source (Org)	Type	Source (Author)	Title	Year Published
	Other	RDR	Our Theory of Change	N/A
	Report	RDR	2019 RDR Corporate Accountability Index	2019
	Blog	Nathalie Marechal	RDR Seeks Input on New Standards for Targeted Advertising and Human Rights	2019
	Blog	Amy Brouillette	RDR Seeks Feedback on Standards for Algorithms and Machine Learning, Adding New Companies	2019
	Article	Rebecca MacKinnon, Melissa Brown, Jasmine Arooni	Digital Rights 2020 Outlook: Market Realities and Regulation are Raising the Bar	2020
Social Science Research Council	Report	Kirsten Adams and Bridget Barrett, in collaboration with Mike Miller and Cole Edick	The Rise of Platforms: Challenges, Tensions, and Critical Questions for Platform Governance	2019
	Other	Social Science Research Council	MediaWell	Updated regularly
Stop Online Violence Against Women	White Paper	Shireen Mitchell	How The Facebook Ads that Targeted Voters Centered on Black American Culture: Voter Suppression was the End Game	2018
	White Paper		A Threat to an American Democracy: Digital Voter Suppression	2020
Time Magazine	Online Article	Safiya Noble	Google Has a Striking History of Bias Against Black Girls	2018
University of Chicago: Stigler Center for the Study of the Economy and the State	Report	Luigi Zingales, Filippo Maria Lancieri	Policy Brief for Regulators	2019

Source (Org)	Type	Source (Author)	Title	Year Published
Upturn	Report	Upturn	Leveling the Platform: Real Transparency for Paid Messages on Facebook	2018
	Technical Study	Aaron Rieke, Avijit Ghosh, Levi Kaplan, Alan Mislove, Piotr Spiezynski	Algorithms that "Don't See Color": Comparing Biases in Lookalike and Special Ad Audiences	2019
	Technical Study	Aaron Rieke, Piotr Sapiezynski, Aleksandra Korolva, Alan Mislove, Muhammad Ali	Ad Delivery Algorithms: The Hidden Arbiters of Political Messaging	2019
	Report	Aaron Rieke, Miranda Bogen	Help Wanted: An Examination of Hiring Algorithms, Equity, and Bias	2018
YouGov	Report (Draft)	Sam Luks	Report on browser plug-in recruitment during the 2018 U.S. election season	2019
	Article	Muhammad Ali, Piotr Sapiezynski, Miranda Bogen, Aleksandra Korolova, Alan Mislove, Aaron Rieke	Discrimination Through Optimization: How Facebook's Ad Delivery Can Lead to Skewed Outcomes	2019
	Report (Draft)	Sabrina Hersi-Issa, Arpitha Peteru	Rights x Tech Research: Movement Report	2019
	Other		Online Political Ad Transparency: Building a Path Forward Together	2019

Appendix B: Full List of Named Actors

Foundations

- Alfred P. Sloan Foundation
- Charles Koch Foundation
- Children’s Investment Fund Foundation
- Craig Newmark Philanthropies
- Democracy Fund
- Electronic Frontier Foundation
- Ford Foundation
- John D. and Catherine T. MacArthur Foundation
- John S. and James L. Knight Foundation
- Laura and John Arnold Foundation
- Luminate
- Media Democracy Fund
- Mozilla Foundation
- Natixis Investment Managers
- Omidyar Network
- Open Society Foundations
- Shuttleworth Foundation
- William and Flora Hewlett Foundation

Nonprofits

- Access Now
- Black Lives Matter National Network
- Change the Terms
- Color of Change
- Corporate Human Rights Benchmark
- Free Press
- Hivos People Unlimited
- Internews Center for Innovation and Learning
- National Domestic Workers Alliance
- Lawyers’ Committee for Civil Rights Under Law
- ProPublica
- Public Citizen
- Ranking Digital Rights
- Stop Online Violence Against Women
- Trollbusters
- Upturn

Business

- Consumer Reports
- Fidelity Investments
- MiddleGame Ventures
- Natixis Investment Managers
- YouGov

Government/Intergovernmental Organizations

United States

- Courts
- Federal Communications Commission (FCC)
- Federal Trade Commission (FTC)
- Policymakers
- Regulators
- United States Congress

International

- Group of Seven
- Group of Twenty
- International Grand Committee on Big Data, Privacy and Democracy
- Organisation for Economic Co-operation and Development
- United Nation

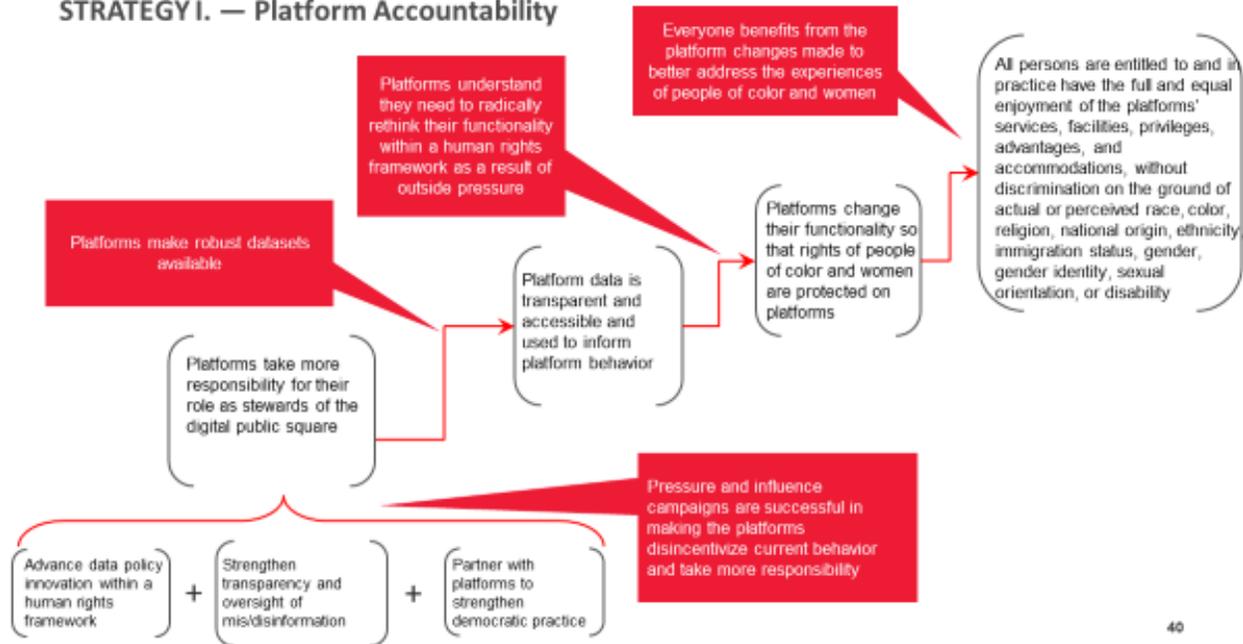
Academia/Research

- Brown University
 - Department of Economics
- Carnegie Mellon University
 - Computer Science and Engineering & Public Policy
 - The Center for Informed Democracy and Social Cyber-Security (IDeaS)
- Columbia University
 - Department of Economics
 - Knight First Amendment Institute
 - School of International and Public Affairs
- Concordia University
 - Department of Communication Studies
- Data & Society Research Institute
- Demos
- Elon University
 - Imagining the Internet Center
- Fordham University
 - Department of Communication and Media Studies
- George Washington University
 - The Institute for Data, Democracy, and Politics
- Georgetown University Law Center
 - Center on Privacy and Technology
- Georgia Tech
 - School of Computer Science
- German Marshall Fund of the United States
- Leibnez Institute for Media Research
- Harvard University
 - Shorenstein Center on Media, Politics and Public Policy
- Indiana University
 - The Observatory on Social Media
- Kristiania University College
 - Department of Communication
 - New York University
 - School of Law
 - The Center for Social Media and Politics (CSMaP)
 - Social Media and Political Participation (SMaPP) Lab
 - Online Political Ads Transparency Project
- Northeastern University
 - NULab for Texts, Maps, and Networks

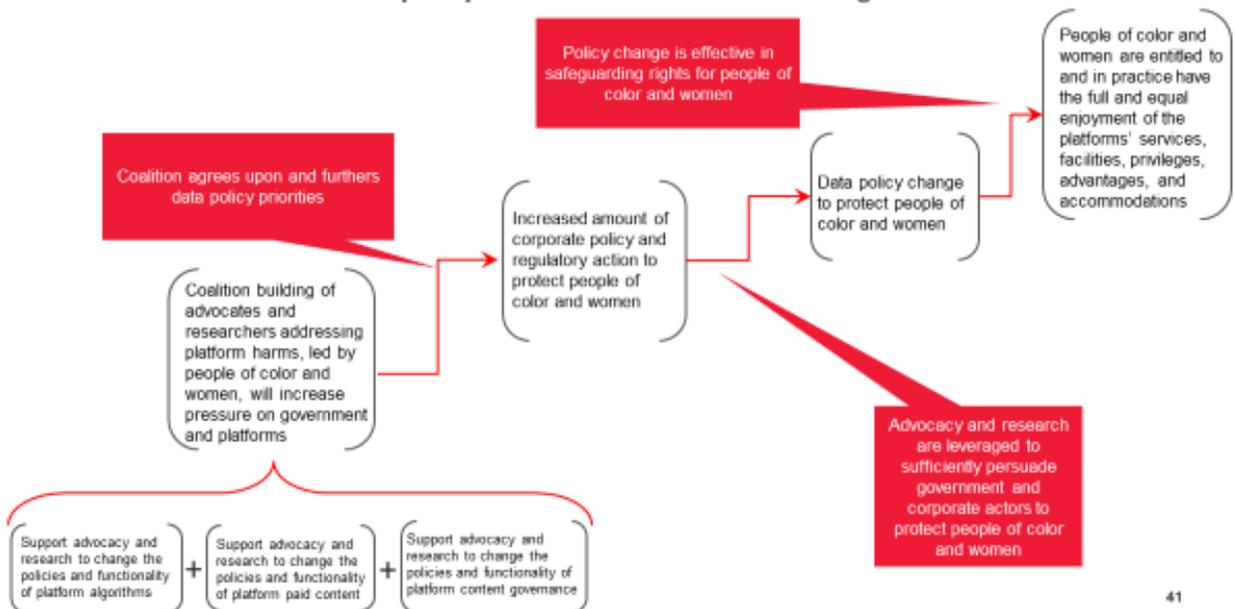
- Pew Research Center
- Princeton University
 - Department of Computer Science
 - Department of Politics
- RAND Corporation
- Rutgers University
 - Rutgers Institute for Information Policy & Law
 - School of Communication and Information
- Sciences Po Paris
 - Department of Economics
 - Laboratory for Interdisciplinary Evaluation of Public Policies (LIEPP)
 - "Evaluation of Democracy" Research Group
- Simon Fraser University
 - School of Communication
- Social Science Research Council
- Stanford University
 - Department of Communication
 - Center for Internet and Society
 - The Project on Democracy and the Internet
 - Center of Philanthropy and Civil Society
- Technical University of Dortmund
 - Institute of Journalism
- The New School
 - Digital Equity Laboratory
- Toulouse School of Economics
- University of Amsterdam
 - Institute for Information Law
- University of British Columbia
 - Department of History
- University of California – Irvine
 - Department of Informatics
 - Donald Bren School of Information and Computer Sciences
- University of Chicago
 - Booth School of Business
 - Department of Computer Science
 - George J. Stigler Center for the Study of the Economy and the State
- University of Helsinki
 - Swedish School of Social Science
- University of Michigan
- University of North Carolina
 - The Center for Information, Technology, and Public Life
- University of Oslo
 - Department of Journalism and Media Studies
- University of Ottawa
 - Department of Communications
- University of Oxford
 - Oxford Centre for Competition Law and Policy
- University of Pennsylvania
 - Annenberg School for Communication
 - Wharton School of Business
- University of Texas at Austin
 - Moody College of Communication
 - The Center for Media Engagement
- University of Toronto
 - Rotman School of Management
- University of Washington
 - Center for an Informed Public
- University of Wisconsin – Madison
 - The Center for Communication and Civic Renewal
- Virginia Tech
 - Department of Communication
- Yale University
 - The Thurman Arnold Project
 - Information Society Project
 - Project on Governing the Digital Public Sphere

Appendix C: Platform Accountability Hypothesis Chains

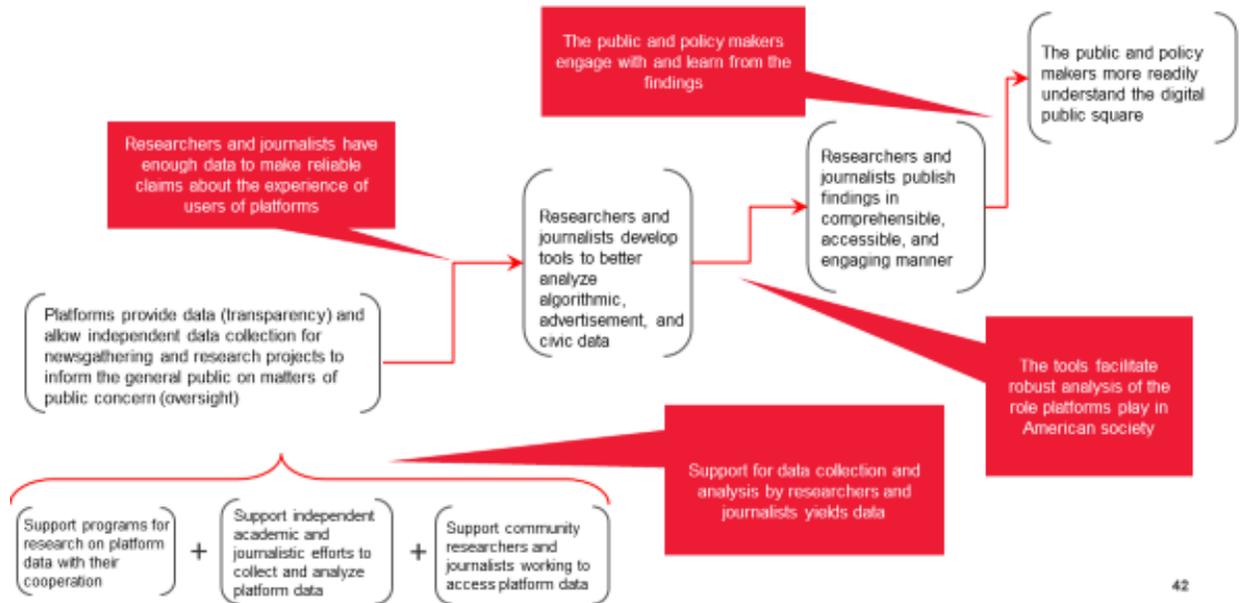
STRATEGY I. — Platform Accountability



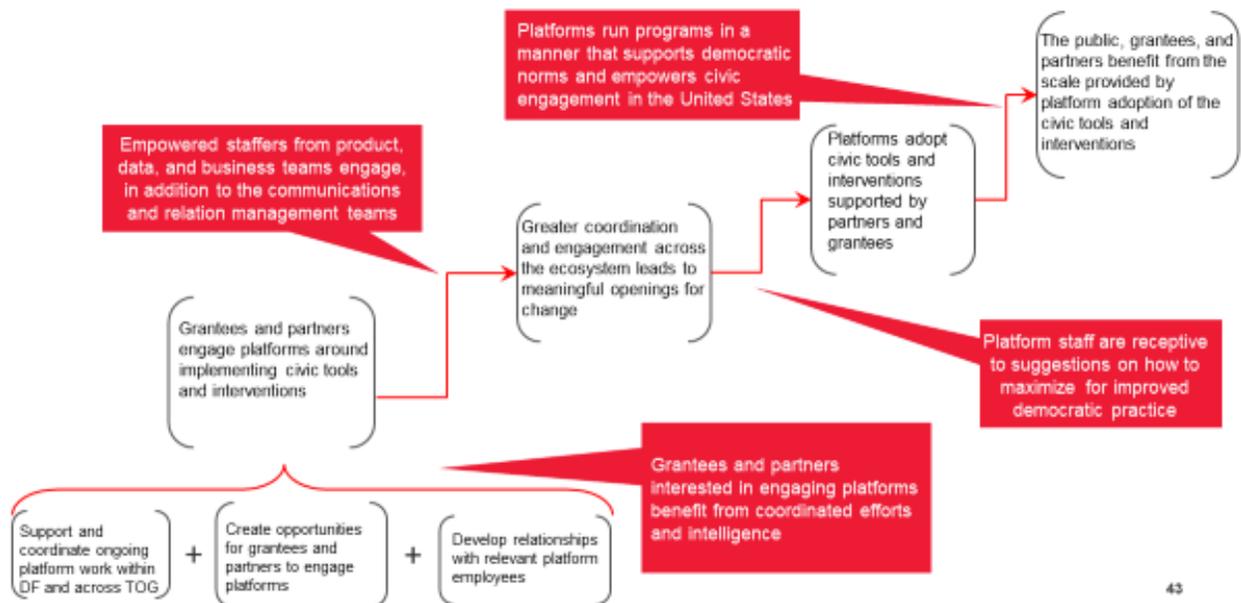
Track I.A. — Advance data policy innovation within a human rights framework



Track I.B. — Strengthen transparency and oversight of mis/disinformation



Track I.C. — Partner with platforms to support democratic practice



Endnotes

Introduction

¹ “Digital New Deal Initiative: Concept Note” Washington, DC: Democracy Fund, 2019.

² See Concept Note for more information about the strategy.

³ A future brief will address Democracy Fund’s work around public interest media in more depth, exploring the existing theories of change to shift the public interest media paradigm.

State of the Field

Landscape

⁴ Alexander C. Hart and Ashley Anderson. “Modern Platform Companies and the Public Interest: A Landscape of Harms and Accountability Efforts.” Freedman Consulting, LLC, 2018.

⁵ Given the quality of the sample and high alignment of the findings, ORS Impact is presenting key findings from Freedman’s original report here. We use direct language from the report so as not to misconstrue the findings.

New Learning About Democracy Fund’s Strategy

Human Rights Data Policy (Track 1.A)

⁶ A human rights framework is one that ensures the full and equal enjoyment of civil, political, and social rights. In this context, that means full and equal enjoyment of the virtual public square created on platforms. As the Digital Democracy Initiative’s Concept Note states, “A human rights frame is also ideal for an analysis that addresses both individual harms from the way inorganic content can drive radicalization here at home and the risk of coordinated state violence abroad.”

⁷ “Imagining a New Deal for the Digital Age,” Washington, DC: Democracy Fund, 2019.

⁸ “Imagining a New Deal for the Digital Age.”

⁹ *Ibid.*

¹⁰ Sabrina Hersi Issa and Arpitha Peteru. “Rights x Tech Research: Movement Report.” n.d.

¹¹ Muhammad Ali et al. “Ad Delivery Algorithms: The Hidden Arbiters of Political Messaging.” Upturn, 2019.

¹² Piotr Sapiezynski et al. “Algorithms That ‘Don’t See Color’: Comparing Biases in Lookalike and Special Ad Audiences.” Upturn, 2019.

¹³ Miranda Bogen and Aaron Rieke. “Help Wanted: An Examination of Hiring Algorithms, Equity, and Bias.” Upturn, 2018.

¹⁴ Cliff Saran, “Interview: Ruha Benjamin, Author, Race After Technology.” ComputerWeekly.com, May 17, 2019. <https://www.computerweekly.com/news/252463549/Interview-Ruha-Benjamin-author-Race-After-Technology>.

¹⁵ David Brody and Sean Bickford. “Discriminatory Denial of Service: Applying State Public Accommodations Laws to Online Commerce.” Lawyers’ Committee for Civil Rights Under Law, 2020.

¹⁶ Charlton McIlwain. “Racial Formation, Inequality and the Political Economy of Web Traffic.” *Information, Communication & Society* 20, no. 7 (November 2016): 1073–89. <https://doi.org/10.1080/1369118x.2016.1206137>.

¹⁷ “RDR Corporate Accountability Index: Draft Indicators.” Ranking Digital Rights, 2019.

¹⁸ Safiya Noble, “Google’s Algorithm: History of Racism Against Black Women.” Time, March 26, 2018. <https://time.com/5209144/google-search-engine-algorithm-bias-racism/>.

¹⁹ “Free Press Action and Lawyers’ Committee for Civil Rights Under Law Release Proposed ‘Online Civil Rights and Privacy Act’ to Combat Data Discrimination.” Free Press, March 11, 2019. <https://www.freepress.net/news/press-releases/free-press-action-and-lawyers-committee-civil-rights-under-law-release-proposed>.

- ²⁰ Rebecca MacKinnon, Melissa Brown, and Jasmine Arooni, “Digital rights 2020 outlook: Market realities and regulation are raising the bar.” Ranking Digital Rights, 2020.
- ²¹ On April 10, 2019, the Accountable, Responsive, Inclusive, and Democratic Platforms meeting was held in Washington, DC. Freedman Consulting, LLC wrote up a summary of the discussion and key takeaways.
- ²² “INTERNAL: Notes and Key Themes from April 10 Accountable, Responsive, Inclusive, and Democratic Platforms Meeting.” Freedman Consulting, LLC, 2019.
- ²³ Luigi Zingales and Filippo Maria Lancieri. “Stigler Committee on Digital Platforms: Policy Brief.” Stigler Committee on Digital Platforms, 2019.
- ²⁴ “Imagining a New Deal for the Digital Age.”
- ²⁵ Miranda Bogen and Aaron Rieke. “Help Wanted: An Examination of Hiring Algorithms, Equity, and Bias.”
- ²⁶ “How the Facebook Ads that Targeted Voters Centered on Black American Culture: Voter Suppression was the End Game.” Stop Online Violence Against Women, 2018.
- ²⁷ “A Threat to an American Democracy: Digital Voter Suppression.” Stop Online Violence Against Women, 2020.
- ²⁸ Piotr Sapiezynski et al. “Algorithms That ‘Don’t See Color’: Comparing Biases in Lookalike and Special Ad Audiences.”
- ²⁹ Muhammad Ali et al. “Discrimination Through Optimization: How Facebook’s Ad Delivery Can Lead to Skewed Outcomes.” 2019.
- ³⁰ “INTERNAL: Notes and Key Themes from April 10 Accountable, Responsive, Inclusive, and Democratic Platforms Meeting.”
- ³¹ “RDR Seeks Input on New Standards for Targeted Advertising and Human Rights.” Ranking Digital Rights, April 24, 2019, <https://rankingdigitalrights.org/2019/02/20/rdr-seeks-input-on-new-standards-for-targeted-advertising-and-human-rights/>.
- ³² “Free Press Action and Lawyers’ Committee for Civil Rights Under Law Release Proposed ‘Online Civil Rights and Privacy Act’ to Combat Data Discrimination.”
- ³³ “Imagining a New Deal for the Digital Age.”
- ³⁴ David Brody and Sean Bickford. “Discriminatory Denial of Service: Applying State Public Accommodations Laws to Online Commerce.”
- ³⁵ Ellen Goodman. “The First Amendment Opportunism of Digital Platforms.” The German Marshall Fund of the United States, March 1, 2019. <http://www.gmfus.org/publications/first-amendment-opportunism-digital-platforms>.
- ³⁶ “How the Facebook Ads that Targeted Voters Centered on Black American Culture: Voter Suppression was the End Game.”
- ³⁷ “INTERNAL: Notes and Key Themes from April 10 Accountable, Responsive, Inclusive, and Democratic Platforms Meeting.”
- ³⁸ Dell Cameron. “Facebook’s Sheryl Sandberg Hears Concerns of Civil Rights Leaders But Offers No Promises.” Gizmodo, October 4, 2019, <https://gizmodo.com/facebooks-sheryl-sandberg-hears-concerns-of-civil-right-1838498066>.
- ³⁹ Deen Freelon and Tetyana Lokot. “Russian Twitter Disinformation Campaigns Reach across the American Political Spectrum.” Misinformation Review, February 21, 2020. <https://misinforeview.hks.harvard.edu/article/russian-disinformation-campaigns-on-twitter/>.
- ⁴⁰ Robert Gorwa. “Models for Platform Governance: Regulating Them Softly.” Center for International Governance Innovation, 2019.
- ⁴¹ Karen Kornbluh. “The End of Techno-Utopianism.” The German Marshall Fund of the United States, January 21, 2020. <http://www.gmfus.org/publications/end-techno-utopianism>.
- ⁴² Gennie Gebhart. “Who Has Your Back? Censorship Edition 2019.” Electronic Frontier Foundation, 2019.
- ⁴³ Rebecca MacKinnon, Melissa Brown, and Jasmine Arooni. “Digital rights 2020 outlook: Market realities and regulation are raising the bar.”

Transparency (Track 1.B)

⁴⁴ “Imagining a New Deal for the Digital Age.”

⁴⁵ *Ibid.*

⁴⁶ Luigi Zingales and Filippo Maria Lancieri. “Stigler Committee on Digital Platforms: Policy Brief.”

⁴⁷ “RDR Corporate Accountability Index: Draft Indicators.”

⁴⁸ Free Press and the Lawyers Committee for Civil Rights Under Law. “The Online Civil Rights and Privacy Act of 2019.”

⁴⁹ Luigi Zingales and Filippo Maria Lancieri. “Stigler Committee on Digital Platforms: Policy Brief.”

⁵⁰ Laura Edelson, Shikhar Sakhuja, Ratan Dey, and Damon McCoy. “An Analysis of United States Online Political Advertising Transparency.”

⁵¹ Karen Kornbluh. “The End of Techno-Utopianism.”

⁵² For more information about NYU’s Online Political Ads Transparency Project, visit

<https://engineering.nyu.edu/research/online-political-ads-transparency>

⁵³ Laura Edelson, Shikhar Sakhuja, Ratan Dey, and Damon McCoy. “An Analysis of United States Online Political Advertising Transparency.”

⁵⁴ “Imagining a New Deal for the Digital Age.”

⁵⁵ “INTERNAL: Notes and Key Themes from April 10 Accountable, Responsive, Inclusive, and Democratic Platforms Meeting.”

⁵⁶ Luigi Zingales and Filippo Maria Lancieri. “Stigler Committee on Digital Platforms: Policy Brief.”

⁵⁷ Kirsten Adams and Bridget Barrett, in collaboration with Mike Miller and Cole Edick. “The Rise of Platforms: Challenges, Tensions, and Critical Questions for Platform Governance.” Social Science Research Council, 2019.

⁵⁸ Claire Wardle. “Assessing Current Efforts of Platforms and Their Effectiveness.”

⁵⁹ Nic Dias. “How Academics Can Help Platforms Tackle Disinformation.”

⁶⁰ Knight First Amendment Institute. “Knight Institute Calls on Facebook to Lift Restrictions on Digital Journalism and Research.” Knight First Amendment Institute, 2018.

Partnership (Track 1.C)

⁶¹ “Imagining a New Deal for the Digital Age.”

⁶² Taylor Owen. “Models for Platform Governance: Introduction: Why Platform Governance?” Center for International Governance Innovation, 2019.

⁶³ “Imagining a New Deal for the Digital Age.”

Theories of Change for Holding Platforms Accountable

Explanation of Different Theories

Regulatory Change

⁶⁴ Gene Kimmelman. “Models for Platform Governance: Syncing Antitrust and Regulatory Policies to Boost Competition in the Digital Market.” Center for International Governance Innovation, 2019.

⁶⁵ Gene Kimmelman. “The Right Way to Regulate Digital Platforms.” Shorenstein Center, October 7, 2019, <https://shorensteincenter.org/the-right-way-to-regulate-digital-platforms/>.

⁶⁶ Ellen Goodman. “The First Amendment Opportunism of Digital Platforms.”

⁶⁷ Philip Verveer. “Platform Accountability and Contemporary Competition Law: Practical Considerations.” Shorenstein Center, November 2018, <https://shorensteincenter.org/wp-content/uploads/2018/11/Phil-Verveer-Practical-Considerations-Nov-2018.pdf>.

⁶⁸ Philip Verveer. "Platform Accountability: An Interim Measure." Shorenstein Center, April 2019, <https://shorensteincenter.org/wp-content/uploads/2019/04/Verveer-April-2019.pdf>.

⁶⁹ Gene Kimmelman. "The Right Way to Regulate Digital Platforms."

⁷⁰ Ellen Goodman. "Section 230 of the Communications Decency Act and the Future of Online Speech." The German Marshall Fund of the United States, August 22, 2019, <http://www.gmfus.org/publications/section-230-communications-decency-act-and-future-online-speech>.

⁷¹ Philip Napoli. "User Data as Public Resource: Implications for Social Media Regulation." Policy & Internet, doi: 10.1002/poi3.216.

⁷² Karen Kornbluh. "The End of Techno-Utopianism."

⁷³ Jonathon W. Penney. "Models for Platform Governance: Protecting Information Consumers." Center for International Governance Innovation, 2019.

⁷⁴ Philip Verveer. "Countering Underinvestment in Prevention by Platform Companies," Shorenstein Center, October 31, 2019, <https://shorensteincenter.org/countering-underinvestment-in-prevention-by-platform-companies/>.

⁷⁵ Luigi Zingales and Filippo Maria Lancieri. "Stigler Committee on Digital Platforms: Policy Brief."

Civil Rights

⁷⁶ Safiya Noble. "Google's Algorithm: History of Racism Against Black Women."

⁷⁷ "Free Press Action and Lawyers' Committee for Civil Rights Under Law Release Proposed 'Online Civil Rights and Privacy Act' to Combat Data Discrimination."

⁷⁸ David Brody and Sean Bickford. "Discriminatory Denial of Service: Applying State Public Accommodations Laws to Online Commerce."

⁷⁹ *Ibid.*

Pressure

⁸⁰ "A Threat to an American Democracy: Digital Voter Suppression."

⁸¹ Cliff Saran. "Interview: Ruha Benjamin, Author, Race After Technology."

⁸² "RDR Corporate Accountability Index: Draft Indicators."

⁸³ "Our Principles," Ranking Digital Rights, accessed December 21, 2019, <https://rankingdigitalrights.org/about/principles/>.

⁸⁴ "Theory of Change," Ranking Digital Rights, accessed December 21, 2019, <https://rankingdigitalrights.org/about/principles/>.

⁸⁵ "RDR Seeks Input on New Standards for Targeted Advertising and Human Rights."

⁸⁶ Rebecca MacKinnon, Melissa Brown, and Jasmine Arooni. "Digital rights 2020 outlook: Market realities and regulation are raising the bar."

⁸⁷ "Leveling the Platform: Real Transparency for Paid Messages on Facebook." Upturn, May 2018.

⁸⁸ Miranda Bogen and Aaron Rieke. "Help Wanted: An Examination of Hiring Algorithms, Equity, and Bias."

⁸⁹ Kate Klonick. "Models for Platform Governance: Does Facebook's Oversight Board Finally Solve the Problem of Online Speech?" Center for International Governance Innovation, 2019.

⁹⁰ Ellen Goodman. "The First Amendment Opportunism of Digital Platforms."

⁹¹ Heidi Tworek. "Social Media Councils." Center for International Governance Innovation, 2019.

Research

⁹² "Knight Invests \$50 Million to Develop New Field of Research around Technology's Impact on Democracy." Knight Foundation, accessed December 21, 2019, <https://knightfoundation.org/press/releases/knight-fifty-million-develop-new-research-technology-impact-democracy/>.

⁹³ Sam Gill. "Strengthening Democracy in the Digital Age." Medium, August 1, 2019, <https://medium.com/trust-media-and-democracy/strengthening-democracy-in-the-digital-age-knights-50-million-investment-in-a-new-field-of-1fc4fadf5ec4>.

⁹⁴ Sam Gill. "America's Digital Dilemma: Is Technology Harming Our Democracy," Knight Foundation, accessed December 21, 2019, <https://knightfoundation.org/articles/americas-digital-dilemma-is-technology-harming-our-democracy/>.

⁹⁵ Sam Gill. "Strengthening Democracy in the Digital Age."

⁹⁶ "MediaWell." Social Science Research Council, accessed December 21, 2019. <https://mediawell.ssrc.org/>

⁹⁷ "Fighting Disinformation Online." RAND Corporation, accessed December 21, 2019, <https://www.rand.org/research/projects/truth-decay/fighting-disinformation.html>.

⁹⁸ Nic Dias. "How Academics Can Help Platforms Tackle Disinformation."

⁹⁹ Nic Dias. "How Academics Can Help Platforms Tackle Disinformation."; Claire Wardle, "Assessing Current Efforts by the Platforms and their Effectiveness."

¹⁰⁰ Nic Dias. "How Academics Can Help Platforms Tackle Disinformation."

¹⁰¹ Laura Edelson, Shikhar Sakhuja, Ratan Dey, and Damon McCoy. "An Analysis of United States Online Political Advertising Transparency."

¹⁰² Knight First Amendment Institute. "Knight Institute Calls on Facebook to Lift Restrictions on Digital Journalism and Research."