Feedback on Paragraph 10

Paragraph 10 calls for regulatory processes to be led through an “open, transparent, multistakeholder, and evidence-based manner”. Increasingly, there are trials of innovative democratic processes for governing online platforms. In particular, the use of randomly selected representative groups of users (‘citizen assemblies’ or ‘citizen juries’) to hear from experts, deliberate on policy issues, and issue decisions or recommendations to platforms. Processes like these have been successful at progressing contentious policy issues in other domains, such as on abortion rights in Ireland and climate change action in France. See [1] Ovadya (2021) “Towards Platform Democracy: Policymaking Beyond Corporate CEOs and Partisan Pressure”, Berkman Klein Center, Harvard Kennedy School; [2] Ovadya (2022) “‘Platform Democracy’—a very different way to govern big tech”, Reimagining Social Technologies.

Feedback on Paragraph 65

Paragraph 65 states “content curation and recommendation systems that provide different sources and include different viewpoints around trending topics should be made clearly available to users”. The authors should be aware that while there is substantial evidence that intergroup contact can play an important role in de-escalating conflict, simply showing users outgroup content in their social media feeds can sometimes escalate conflict, causing people to become more firmly entrenched in their existing beliefs. There is considerable subtlety and nuance regarding which varieties of outgroup content, and which presentation format, will have a net positive effect on democracy or respect for human rights. Simply encouraging that recommendation systems provide “different sources and include different viewpoints around trending topics” may not be precise enough to promote the intended aims of these guidelines, and may backfire. See [1] Paluck et al. (2018) “The contact hypothesis re-evaluated”, Behavioural Public Policy; [2] Bail et al. (2018) “Exposure to opposing views on social media can increase political polarization”, PNAS. We also note that there is an emerging research area focused on how recommendation algorithms on online platforms, and the design of platforms more broadly, can draw on insights from peacebuilding and conflict mediation/management/transformation communities. See [1] Ovadya + Thorburn (2023) “Bridging Systems: Open Problems for Countering Destructive Divisiveness across Ranking, Recommenders, and Governance” (forthcoming, to be published by the Knight First Amendment Institute at Columbia University); [2] Ovadya (2022) “Bridging-Based Ranking: How Platform Recommendation Systems Might Reduce Division and Strengthen Democracy”, Belfer Center, Harvard Kennedy School; [3] Schirch (2023) “A Roadmap for Collaboration on Technology and Social Cohesion”, Toda Peace Institute; [4] Schirch (2023) “The Case for Designing Tech for Social Cohesion: The Limits of Content Moderation and Tech Regulation”, Yale Journal of Law and the Humanities.

Feedback on Paragraph 72

Paragraph 72 states “data should be made available through automated means, such as application programming interfaces (APIs)”. The authors should be aware of ways in which corporate platforms can design the terms of use of data access mechanisms such as APIs in bad faith, creating “transparency theatre” that does not meaningfully contribute to transparency or facilitate research. See [1] Bak-Coleman (2023) “TikTok’s API Guidelines Are a Minefield for Researchers”, Tech Policy Press; [2] Brown (2023) “The Problem with TikTok’s New Researcher API is Not TikTok”, Tech Policy Press.

Feedback on Paragraphs 75-76

Paragraphs 75-76 discuss the importance and benefits of user reporting. The authors should also be aware that user reporting mechanisms are a common vector for gaming and abuse, and so reports from users cannot be taken at face value. For example, a user may report another user who they dislike or disagree

with, in an attempt to get them censored. See [1] Dworkin (2018) “Facebook is rating the trustworthiness of its users on a scale from zero to 1”, Washington Post.