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RE: Submission on Disinformation in the Digital Age

[Ranking Digital Rights](#) strongly supports the mandate and the work of the UN Special Rapporteur on the right to freedom of opinion and expression and welcomes the decision by the Special Rapporteur to focus her thematic report on the issue of disinformation.

Ranking Digital Rights (RDR) is an independent, nonprofit research program at New America, a nonpartisan think tank in Washington, D.C. RDR works to promote freedom of expression and privacy on the internet by creating global standards and incentives for companies to respect and protect users' rights. We do this by ranking in the [RDR Corporate Accountability Index](#) the world's most powerful digital platforms and telecommunications companies on relevant commitments and policies, based on international human rights standards. We work with companies as well as advocates, researchers, investors, and policymakers to establish and advance global standards for corporate accountability. Our fifth edition, the 2020 RDR Corporate Accountability Index will launch on February 24, 2021 (accessible on that day at <https://www.rankingdigitalrights.org/index2020>).

The Ranking Digital Rights Corporate Accountability Index [methodology and indicators](#) are openly available and licensed under the [Creative Commons Attribution 4.0 International License](#). Researchers around the world have applied the Index methodology to evaluate companies in

local and regional markets, including Iran, the countries of the Arab region, Russia, Kenya, Senegal, India, and Pakistan.

We respectfully submit the following reports, linked and attached, to support your work on disinformation in the digital age.

In spring 2020, RDR launched “[It’s the Business Model: How Big Tech’s Profit Machine is Distorting the Public Sphere and Threatening Democracy](#),” a two-part series for U.S. policymakers concerned with disinformation, targeted advertising, and the question of how internet platforms should be regulated.

In this two-part series, we take a critical look at the social and human rights implications of what drives profits at Facebook, Twitter, and Google. All three tech giants have built their business models on targeted advertising and algorithmic systems that can determine the reach of a message by targeting users who are most likely to share it, and thus influence the viewpoints of thousands or even millions of people. In an election cycle or amid a pandemic, these dynamics can lead to the proliferation of disinformation at a massive scale, with dire consequences for democracy or public health.

We argue that companies’ failures to staunch the flow of problematic content and disinformation online is rooted in their dependence on these systems and the surveillance-based business models that they serve. We recommend policy measures that will protect free expression while holding digital platforms much more accountable for the effects of their business models on public discourse.

“[Part I: Democracy’s Online Speech Challenge](#)” lays out the problems at hand and shows how simply reining in content will not lead to better outcomes for the digital public sphere, or for democracy. We warn against using algorithmic systems or artificial intelligence to filter problematic content, and urge policymakers to preserve Section 230 of the Communications

Decency Act. We argue that companies must be held accountable for how content is amplified and targeted.

“[Part II: Getting to the Source of Infodemics](#)” argues that policymakers should adopt a human rights framework for platform accountability. In the absence of data protection rules, companies have used algorithms to make assumptions about users that determine what content they see and what advertising is targeted to them. This has led to discriminatory practices and amplification of disinformation and harmful speech. We offer recommendations to both companies and policymakers.

This series draws from Ranking Digital Rights’ [March 2020 study](#) evaluating company policies on targeted advertising and algorithmic systems, alongside five years of research on corporate policies that affect online speech and privacy, for the RDR Corporate Accountability Index.

We appreciate the opportunity to provide input for this important thematic report. If you have any questions or would like any additional information, please let us know. We look forward to the report and to continuing to engage with you in support of your mandate.