From the field

An Exploratory Study of Global and Local Discourses on Social Media Regulation

Andrej Školkay[1]

Abstract: This is a study of suggested approaches to social media regulation based on an exploratory methodological approach. Its first aim is to provide an overview of the global and local debates and the main arguments and concerns, and second, to systematise this in order to construct taxonomies. Despite its methodological limitations, the study provides new insights into this very relevant global and local policy debate. We found that there are trends in regulatory policymaking towards both innovative and radical approaches but also towards approaches of copying broadcast media regulation to the sphere of social media. In contrast, traditional self- and co-regulatory approaches seem to have been, by and large, abandoned as the preferred regulatory approaches. The study discusses these regulatory approaches as presented in global and selected local, mostly European and US discourses in three analytical groups based on the intensity of suggested regulatory intervention.

Author information:
Dr. Andrej Školkay is director of research at the School of Communication and Media, Bratislava, Slovakia. He has published widely on media and politics, especially on political communication, but also on ethics, media regulation, populism, and media law in Slovakia and abroad. His most recent book is Media Law in Slovakia (Kluwer Publishers, 2016). Dr. Školkay has been a leader of national research teams in the H2020 Projects COMPACT (CSA - 2017-2020), DEMOS (RIA - 2018-2021), FP7 Projects MEDIADEM (2010-2013) and ANTICORRP (2013-2017), as well as Media Plurality Monitor (2015).

Introduction

This study provides a global overview of some traditional but mostly innovative approaches that have been suggested for social media (SM) regulation as presented in global and local media discourses. The aim is first to provide an overview of the debate and the main arguments and concerns, and second to systematise this in order to construct taxonomies.

Before doing that, we explain why this topic is relevant to the broader academic, regulatory, legal, policymaking and public regulatory policies communities. There has been a sea change in approaches to SM regulation in many countries, especially in the *European Union* (EU) – both at the EU level and EU member state level (see, e.g. Spindler, 2017; Theil, 2019; Smith, 2019b), and in Australia and New Zealand, as well as in many other countries, especially in the last two years (2018–2019). This paradigmatic change has also been reflected in national and global media discourses. Indeed, a large combination of the public, journalistic and academic opinions recently presented in the media have voiced suggestions on how to regulate SM, with an intensified debate since 2016, in EU countries as well as in some non-EU countries.

There are at least two main global impulses and several strong local events or general arguments supporting that development from a regulatory perspective. The first global push for more effective SM regulation originated after the *Facebook–Cambridge Analytica* scandal in early 2018.[2] This scandal revealed a huge abuse of personal data for commercial-political purposes by a third party with possible political-electoral impact.

Second, it was the Christchurch (New Zealand) mosque shooting broadcasted via *Facebook* live for some time in early 2019.[3] This scandal shocked the public due to the easiness of live video-broadcasting a religiously-motivated terrorist act and raised awareness regarding normative and legal challenges of sharing this type of messages.

In between, a well-researched story by Frenkel, Confessore, Kang, Rosenberg and Nicas (2018) revealed how different were the public and private (in-house) approaches of *Facebook*'s executives to regulation. The later journalistic story (Horwitz & Seetharaman, 2020) revealing internal discussions of *Facebook* employees how *Facebook* researched ways to reduce the spread of divisive content on the platform since 2016, published by the *Wall Street Journal*, seemed to be less balanced and more sensationalist (see Newton, 2020). In any case, *Facebook* provided a list of measures aimed at improving communication on *Facebook* introduced since that time (see Rosen, 2020).

---

[2] See e.g https://www.theguardian.com/news/series/cambridge-analytica-files
[3] See e.g. https://www.stuff.co.nz/national/christchurch-shooting

Even earlier, in the UK context at least, the suicide of a British teenager in 2017, allegedly after viewing disturbing content about suicide on social media, caused a serious uproar amongst the UK public and politicians with calls for strict regulation of SM (BBC, 2019). Similar events occurred in other countries, e.g. in Denmark, with calls for 'responsibility', 'restrictions' or 'action' (Williams, 2019)[4], or riots with casualties in India associated with SM use in recent years. There was a case of the rape of a woman in Sweden, which was broadcast live on a closed *Facebook* group with more than 60,000 members in 2017 (The Local, 2017). There was a live broadcast of killing an infant in Thailand in 2017 (The Guardian, 2017).

It should be mentioned that online communication amongst terrorists, including terrorist communication on SM, led to initial discussions on SM regulation within EU already by 2016 (Boffey, 2018)[5]. Finally, secret Russian meddling into the US Presidential campaign in 2016 through SM (Savage, 2017; Galante & Ee, 2018; U.S. Senate Select Committee on Intelligence, 2019), and the perceived negative role of SM during campaigning before the UK referendum on leaving the EU (Benoit & Matsuo, 2019; Fletcher & Selva, 2019; Hänska-Ahy & Bauchowitz, 2017), contributed to more urgent discussion on SM regulation. At the same time, it should be mentioned that many studies on how individuals' engagement with digital technology influences peoples' thoughts, emotions, behaviour, health and well-being raise doubts about the effects of SM (Reeves, Ram, & Robinson, 2020).

Even before these two global scandals and regional and local scandals shocked publics, regulators and politicians, criticism was increasingly voiced on how SM platforms operate. Indeed, at the EU level (and in some EU member states) there are some partial hard and soft regulations in force that target certain aspects of SM, such as the *General Data Protection Regulation* (GDPR), Copyright Directive, the revised *Audiovisual Media Services Directive* (AVMSD) and the *E-Commerce Directive, Brussels I*.[6], and the *EU Code of Practice on Disinformation*. Nonetheless, the *European Commission* is planning legislation that will force SM platforms to remove illegal content or face the threat of sanctions under a comprehensive 'Digital Services Act'.[7] This draft directive was originally planned to be submitted for further public discussion by the end of 2020 (Murgia, 2019). In general, as put by Balkin (2020), 'Social media companies are key institutions in the 21st century digital public sphere. … Digital media become the key institutions that either maintain or undermine the health of the public sphere.'

---

[4] The Danish government has set up an inter-ministerial working group, which is assessing possible initiatives and solutions regarding regulating content and liability on SM. It is expected that the working group will finish its work in autumn 2020.

[5] Weimann (2014) produced one of the first introductory studies on the use of SM by terrorists. In Israel, some called the wave of terrorist stabbing attacks that spread from late 2015 to mid-2016 "The Facebook intifada".Yet this appeared to be an exaggeration, see Issacharoff, 2015.

[6] See Regulation (EU) No 1215/2012 of The European Parliament And Of The Council of 12 December 2012 on jurisdiction and the recognition and enforcement of judgments in civil and commercial matters,
https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2012:351:0001:0032:En:PDF

[7] See The Digital Services Act package, https://ec.europa.eu/digital-single-market/en/digital-services-act-package

Therefore, this article has both theoretical and policy relevance when it provides an overview and taxonomy of global discourses on SM regulation.

The Importance of National Public Spheres for Global Regulatory Discourse

A key challenge when it comes to EU-wide debates remains the prevalent fragmentation of the EU media landscape along divisions of language. It is therefore very possible that debate on a certain topic may be limited geographically and may not be taken up across the EU. The original idea behind the selection of opinions and commentaries was to make usually less vocal local voices accessible in EU-wide debates on the various aspects of SM. Unfortunately, there are so many rapid changes occurring at technological, political and legal regulatory levels that some of the suggestions discussed below may already be obsolete. Moreover, it was revealed that it is unnecessarily self-limiting to find inspiration for this topic only within the EU member states. Therefore, ultimately, for this study, we have analysed and summarised newspaper and journal articles (op-eds, interviews and more analytical articles) as well as, occasionally, blogs, from a broad range of European and non-European countries. The aim of this exercise was to gain a more in-depth understanding of the political debates on SM regulation throughout the EU and beyond as articulated publicly by experts, journalists and regulators.

Why do we study the global discourse on SM regulation? Clearly, the rapidly increasing complexity of global communication infrastructures and technological convergence have facilitated easy national and sometimes transnational discussions on global issues such as SM regulation, which, in some respects, requires global or, at least, a coordinated effort by the key global players. Monitoring global discourses as well as the possibility to contribute to a global public sphere is facilitated by modern technologies that allow automatic translation of almost any language on the screen of a computer.

However, there are some doubts about the importance of national media for global debates. Yet, if there is any example that supports the role of national media, including specialised blogs, in global discourses, then it is exactly the debate on SM regulation that highlights the importance of national media discourses for a global debate. In this debate, national discourses are relevant, especially as an inspiration for suggested regulatory challenges and solutions and for monitoring the ongoing, rapidly changing regulatory and technological developments at a national level.

The global and local media discourses are characterised by an implicit discursive power. Discursive power refers to the degree to which the categories of thought, symbolisations and linguistic conventions determine actors' ability to control the actions of others, or to obtain new capacities (Reed, 2013, cited in Jungherr, Possegga, & An, 2019). Jungherr et al. (2019) argue that discursive power is better

suited than established concepts for capturing the richness of influence in discourse across media. Legacy and/or new media are still crucial elements in the global and local dissemination of opinions and news and the reactions to and interpretations of them (Fairclough, 2006). Indeed, national public spheres are gradually becoming de-territorialised through the 'increased presence of global connections within the national framework' (Hjarvard, 2001, cited in Olausson, 2013, p. 1286). This can be seen in international editions of some national media outlets (e.g. *The Guardian International*), or in international and/or foreign communication/media supported by some governments (e.g. *Al Jazeera English, RT*), or in foreign language editions of national media outlets (e.g. *Le Monde diplomatique* in English). Moreover, national public spheres are providing perspectives on a problem that 'both migrates across and transcends national frames of reference or explanation, exposing international interconnections, contextualising motives and exploring both the scope of the problem and its human consequences' (Cottle, 2009, cited in Olausson, 2013, p. 1287). In our case, it is the issue of SM regulation. This was the idea behind our motivation to summarise such examples of discourse on SM regulation in Table 1. Clearly, 'a global news discourse … encompasses consensual and unifying constructions of the global as well as antagonistic and polarising ones' (Berglez, 2008, cited in Olausson, 2013, p. 1288). This perspective will be documented in Appendix 1, which lists global and local narratives, although it should be mentioned that we did not include viewpoints that opposed any regulation whatsoever. This is clearly no longer a viable option. Thus, it could be argued that this article is openly imbalanced. In summary, national discourses are becoming increasingly global ones regarding the issues discussed and have the potential to resolve some of the global issues.

Methodology

This is an exploratory research project. Exploratory research is often used where causality is not of primary interest, such as is the case with our topic. Exploratory studies result in a range of causes and alternative options for the solution of a specific problem, and that is the point we are primarily interested in. There are limited or a lack of rules for collecting data in exploratory research. Nevertheless, exploration can produce valid and insightful findings in social sciences if conducted in a transparent and self-reflexive way (Reiter, 2017). In short, exploratory research is not intended to provide conclusive evidence, but helps us to have a better understanding of the problem and identify new avenues and hypotheses to be further tested.

Our approach is situated at the borderline between media content analysis and argumentative discourse analysis. Discourse analysis is largely a qualitative method; thus, the reliability and validity of the analysis cannot be ascertained in exactly the same way as in quantitative approaches. Out of a number of theoretically different discursive approaches (such as Foucault, Wittgenstein, Derrida, Habermas), we

primarily use here Habermasian-inspired discourse analysis. It focuses on the consensual and consensus-generating aspects of discourse and on the analysis of discourse as a system of socially agreed upon justifications. Clearly, this approach is the closest to policymaking that seeks a consensus as well as to understanding discourse as rhetoric that is manifested in the form of discursive policy legitimation strategies. As a discursive strategy, legitimation consists of justifying and sanctioning a certain action (policy) or power, on the basis of normative or other reasons (Carvalho, 2000).[8] In practical research terms for this study, it meant reading collected articles with the aim of concisely identifying the suggested policies on SM regulation.

Our final aim was to create a classification of SM regulation approaches emerging in a global discourse. There are two basic approaches to classification – typology and taxonomy. The key characteristic of a typology is that its dimensions represent concepts rather than empirical cases. Taxonomies differ from typologies in that they classify items on the basis of empirically observable and measurable characteristics. It is arguable in the present case whether regulatory suggestions show empirically observable and measurable characteristics or whether they represent concepts. Apparently, regulatory suggestions seem to be in-between cases, possibly closer to the former than to the latter. However, Lenski (1994) explicitly mentions that taxonomies are useful both as a foundation for the formulation of basic theory and as a spur to further innovative research.

Miles and Huberman (1994, pp. 29–34) argue that sampling strategies for qualitative research should be driven by a conceptual question, not by concern for 'representativeness'. We fully followed this methodological advice. Therefore, out of three suggested categories (1. Selecting apparently typical/representative examples, 2. Selecting negative/disconfirming examples and 3. Selecting exceptional or discrepant examples), we have focused on two categories (1 and 3, while we did not include viewpoints that opposed any regulation whatsoever, i.e. category 2 – negative, disconfirming examples). Moreover, at times, we went beyond our study time span (approximately 2017–2019) and included interesting examples from categories 1 and 3. Initially, partners in selected countries helped us to identify locally-relevant articles in the second quarter of 2018, as can be seen in Table 1.

Table 1: Country of Origin of Articles in Original Languages
(Total: 407)

EU member states	Number of articles	EU member states	Number of articles
Austria	10	Ireland	14
Belgium	8	Italy	20

[8] It is no coincidence that in China Foucault is seen as an author of the most suitable concept in philosophy explaining "procedures of prohibition" for online regulation in illiberal societies, see e.g. Guo (n.d.), Martin (2018).

6

Bulgaria	15	Latvia	40
Czech Republic	22	Lithuania	19
Estonia	37	Poland	13
France	11	Portugal	31
Germany	30	Romania	11
Greece	15	Slovenia	20
Hungary	10	Slovakia	50
Estonia	37	Spain	31

In addition, we also used *Google Search* with the key phrase 'SM regulation', or '*Facebook*', sometimes in translation, to get a truly global sample beyond the EU, ranging from Canada to Singapore. This sample included all relevant journalistic textual sources (as identified by the *Google* algorithm, and followed by a manual search). Finally, we did a specific keyword search within a selected group of the most promising newspapers and magazines. Our ultimate aim was to find as many articles as possible on alternative/novel approaches to SM regulation, thus enabling further discussion and proper regulatory policy measure preparation. As mentioned, not 'representativeness', but rather diversity of regulatory suggestions and opinions was our primary focus. As we argue further, it is not necessarily a majority opinion, but it can instead be an innovative solution, suggested by a minority or individuals who can present truly (r)evolutionary regulatory or, typically, technological solutions.

Based on our exploratory search, we find that the most productive global online media sources debating SM regulation more in-depth, over the long term and internationally are *The Conversation* and *Project Syndicate,* and amongst newspapers, *The Guardian* (International Edition) and *The New York Times*. Within the EU, a very useful platform seems to be the *Politico.eu* portal which covers 'Brussels' politics. *The New York Time*s as well as German and British broadsheets (e.g. *The Financial Times*) and some weeklies (e.g. *Focu*s, *The Economist*) have published relevant long pieces on the various aspects of SM regulation.

For clarity, and to document prevailing suggestions for regulating SM based on this global sample, we have created a set of taxonomy tables (Tables 2a–c) with content based on the extrapolation of key tools/approaches for regulation as shown in Appendix 1. We followed here Vaismoradi, Jones, Turunen and Snelgrove (2016) who were inspired by Constas (1992, cited by the previous authors) and have outlined a process of categorisation based on three components: (i) origination, (ii) verification and (iii) nomination. Sometimes, it was difficult to decide whether an author had in mind e.g. media literacy or public information campaigns. Another example was that, if an author suggested 'stricter regulation', we interpreted that as a call for public (state) regulation. However, it was not always clear whether a journalist reported his or her own ideas or simply paraphrased someone else's ideas from a conference. If there was any doubt, we indi-

cated this with a question mark. Many suggestions were aimed at relatively specific issues such as fake news. In other cases, authors suggested solutions to multiple issues. Nonetheless, we believe that this overview may be useful for academics and other stakeholders.

The material is divided according to the different levels of intensity of the suggested regulation. Thus, we start with soft, indirect and/or long-term measures towards SM regulation of low intensity regulatory policy (Table 2a). This includes traditional self-regulation but also other measures. We continue with medium-level intensity regulatory policy (Table 2b). This includes co-regulation but also many other regulatory measures. Finally, there is high-intensity level of regulatory policy. This includes, typically, public (or, as it is called in some countries, state) regulation (Table 2c). This division was inspired by economists who use indicators reflecting 'the severity of business regulation' (e.g. Loayza et al., 2004), 'regulatory business burden' (Djankov et al., 2006), 'the quality of regulatory policy' (Jalilianet al., 2007), 'degree of regulation' (Gorgens et al., 2003; all cited in Parker & Kirkpatrick, 2012). Obviously, we use here only a tentative qualitative categorisation based on a very basic assessment. However, considering missing details about virtually nearly all policy regulatory suggestions targeting SM, it was impossible to use any quantitative data in our case. Moreover, some suggested regulatory measures are hardly measurable (e.g. civil right audits). Our approach is summarised in Legend A.

Legend A (Type and Intensity of Regulation):

General Approach to Regulation	Encouraging/ Supporting Regulation	Demanding/ Increasing Regulation	Punishable/ Enforceable Regulation
Level of Intensity of Regulation	Low Intensity	Medium Intensity	High Intensity
Approximate Category in Traditional Regulatory Schemes	Self-regulation	Co-regulation	Public/state regulation

In order to make this overview even more analytically relevant, we also specified key groups of stakeholders: politicians/states, experts (academics/researchers), regulators, journalists and others (e.g. citizens, students) that were addressed in the articles that we analysed. This is presented in Legend B.

Legend B (Stakeholders):

Politicians/ states	Experts	Regulators	Journalists	Others (e.g. citizens, PhD students)

However, there was no general agreement found amongst any of these groups, or within any of these groups, on the best approach to SM regulation. There was how-

ever a visible trend towards more strict regulation, ultimately meaning regulation based on the law, or some other state-backed or sponsored regulation.

Global and Local Discourses on SM Regulation: The Results and Their Interpretation

General observations

Clearly, there are emerging global views regarding the steps that should be taken towards SM regulation and a global consensus that SM regulation is needed. However, there is not a full consensus either about the key issues that should be regulated or what regulation of SM should look like.[9] Interestingly, there is a clear trend in our material towards either innovative regulatory solutions, and/or rather radical solutions. However, in part, this is due to the nature of our sample because novel ideas are more attractive to media outlets and journalists in general (Ho & Liu, 2015). Within this context, SM regulation can perhaps be seen as a 'bursting issue'. Bursting issues are driven by silent events that lead to short-term peaks in coverage (Geiß, 2018). This explains the limited attention paid to SM regulation in the media discourse.

The foremost policy content issues discussed ranged from utilisation of SM by terrorists, to data protection via the fight against fake news and hoaxes (information disorder) and protection of SM users against social harms in general, and back to data, especially algorithms and online digital identity protection. These narratives clearly follow the most dominant public issues at a particular period, as illustrated in the SM-related scandals mentioned earlier (terrorism and SM was a rather topical issue around and before 2016 (see, e.g. Institute for Policy Analysis of Conflict, 2015). Some issues, such as a need for regulation of chatbots and digital assistants, SM influencers (partly covered by the revised AVMSD) or regulation of video deep fakes, could be identified within our sample only in the most recent period.

Moreover, there is much discussion about increasing citizens/consumers' self-protective measures through e.g. media/data literacy. However, this is increasingly seen as a supplementary measure and not as a substitute for regulation. Similarly, there are suggestions targeting industry, i.e. to increase the quality of journalism and to enable more freedom as well as easy access to data stored on platforms. As one could expect, a common suggestion is to support public service media, which

---

[9] There are distinct domains of regulation (copyright issues, harmful content, fake news and hoaxes, surveillance, SM influencers, virtual reality, bots, etc.), different policy responses (notice and correct, notice and takedown, hard or soft approach, behavioural economy based and technology-algorithm based approaches, etc.), as well as the question of who should regulate and guarantee enforcement (self-, co-, and public regulation), or at which level (state or some global organisation, grassroot bodies or non-profit organisations) or some hybrid regimes. The issue of SM regulation can also be seen from the perspective of types of responsiveness: pyramidal responsiveness, micro-responsiveness, networked responsiveness, meta-regulatory responsiveness and socialist responsiveness (Braithwaite, 2017).

indeed play key information and educative roles in almost all EU member states. Yet, the traditional industry focus (to support the pluralistic legacy media and journalism, or public service media) may not be a sufficient mid-term perspective. Likewise, support for media education, critical thinking skills, digital data competences and media literacy amongst young and old people alike may work only in the long term. Nonetheless, regulatory actions are urgently needed. However, typical legal regulations are often challenged on constitutional (e.g. If there is a free speech, why should we limit or ban even fake speech?; see, e.g. Katsirea, 2018) and definitional grounds (e.g. What is fake news, and who should determine it?; see e.g. Epstein, 2017; Goda, 2020) or status-related issues (e.g. Which tweets should be fact-checked? Who does that fact-checking? Which get added context? What is the context that's added? What makes that different from a newsroom?; see e.g. Bowles, 2020).

Nonetheless, as noted in the above-mentioned *Facebook–Cambridge Analytica* scandal and the Christchurch shooting, these issues frequently have a global impact. In this context, authoritarian states are able to act quickly and efficiently in their regulatory efforts, but liberal democratic societies are more limited in their legal and other regulatory measures. Moreover, the latter states usually discuss these issues in depth and for a longer period of time. However, it is true that, after the Christchurch shooting, some liberal democratic states, such as Australia, passed SM legislation rather quickly (Griffith, 2019).

The first general observation that arises from comparing all three regulatory, intensity-based groups/categories of approaches to SM is that the most frequent regulatory suggestions are in the 'medium' and increasingly in the 'high' intensity regulatory categories. This is true for both the number of original regulatory ideas produced as well as for the number of those participating in global discourse on this topic.

The second important observation is that quantity of opinions should not be considered as an important factor without considering their communication context. From this perspective, this study challenges typical methodologies used in studies of this type. Our sample included mostly commentaries (op-eds) by stakeholders. As we previously mentioned, when stakeholders publish their ideas, they, as well as the media (editors), usually prefer novel ideas. There are some exceptions to this rule – such as when some ideas become deeply rooted in public discourse. For example, this is the case with media literacy. It has become such a popular topic and such an intuitively correct approach that it is difficult to question its effectiveness and efficiency as an indirect regulatory tool. As a result, there is usually no need to question such a 'truism'. It is, in a way, a safe way of arguing for or against efficient and effective SM regulation by anybody. One can argue that better or more media/data literacy programmes will be sufficient for eliminating all the harm caused by SM. Yet, some research shows that media literacy efforts can have little to no impact in specific cases, or even produce harmful effects as a result of

overconfidence (Bulger & Davison, 2018).

The third observation is that this global debate has been, in part, influenced by global initiatives or local discussions about nation-specific initiatives. In other words, some national debates seemed to be influenced by regulatory efforts in the EU (e.g. earlier discussion on digital taxes in Europe or the more successful introduction of GDPR) or elsewhere, or by local regulatory solutions (e.g. discussion in Uganda about taxing SM users instead of SM platforms). Thus, in many national contexts (e.g. in Ecuador), the focus of discussion has not been that much on alternative forms of regulations but rather on legislation enacted by governments.

With regard to the authors having written the articles that we analysed, the discourse appears to be dominated by experts (in technology and/or law) and, to lesser degree, by politicians. Regulators are not heavily represented in this national–global debate either. The reasons for this lack of participation in a global discourse may have to do with the type of our sample which is partly based on self-initiative (only rarely do media invite specific, publicly unknown experts to contribute to such a specific debate, and even less often do they seem to initiate extensive professional debate on very specific regulatory issues). Furthermore, politicians express their opinions in different forms rather than exclusively in commentaries: in interviews, press releases and similar formats. The commentaries, which do not include that many novel ideas, were, ironically, written by journalists engaged in writing op-eds. It is true that the journalists could contribute novel ideas if they were specialised journalists, or if they referred to a variety of experts and other stakeholders in longer analytical pieces. Somewhere between experts, politicians and regulators on the one hand, and journalists on the other hand, with respect to their level of novelty of suggested regulatory ideas, civic activists and citizens could be located.

Low intensity regulatory policies

Table 2a: 1st Level – Low Intensity Regulatory Policies

Suggested Regulatory Approach	Supporting Stakeholders				
	Politicians/ states	Experts	Regulators	Journalists	Others
Nation-specific solutions	(There are many such efforts)	Vaidhyanathan		Wenwen	
Public information campaigns/Public Pressure (incl. boycotts)	(There are such efforts at the EU level and some member states levels)	Nye, McNamee, Tugend, Balkin		Malik, Gibbs, Reporters without Borders, Lucas, Aro	Private companies, NGOs, YouTubers
Courts	Meier(?) (The courts intervene already)	Ognyanova		Malik	
Taxation	Danko, Austria, Brazil, the Czech Republic, the EU, India, Indonesia, Italy, Spain, Turkey, the UK	Morozov, Muwema, Mutibwa		Schutz	Raddi, Melioris, Owen, Woira
Changes in Institutional Framework	Denmark France EU and many other EU member states	Greer Mazzucato Scalzi, Shane Van Alstyne			
Self-regulation by platforms	Pope, Jourová	Sharockman, Marcus, Smith, Balkin, Zittrain, Gauci		Hadas-Lebel, Geist	Avni

If we focus on the most typical regulation in the case of the newspaper sector, i.e. self-regulation, we see that there are very few stakeholders who support this regulatory approach for SM. This cohort includes the Pope, EU commissioner Jourová (co-responsible at that time for SM efforts), two journalists, and some experts in this field. However, experts, for example *Microsoft*'s president and chief legal officer, Brad Smith, see the option of self-regulation as just one of a few regulatory options that are actually more intensive and comprehensive measures, including co-regulation.

Historically, many critical indicators, including clearly-defined responsibilities, transparent regulatory processes and measurable results, adequate sanction powers, periodic reviews and external control by the general public and the state, have not been effectively prioritised in self-regulatory initiatives (Lievens, 2016). Indeed, a recent report claims that some SM failed to ensure adequate moderation for non-Western countries that are in varying degrees of turmoil (Nicol, 2020). Similarly, Germany reported that major SM platforms did not follow their regulatory obligations as agreed with the European Commission (Eckert, Mannheim & Steinhäuser, 2020). Balkin (2020) has outlined a few arguments why, for example, *Facebook*'s *Oversight Board for Content Decisions*[10], cannot be seen as a solution either. Yet, self-regulation can be also considered as focused on users, e.g. Gauci (2020)[11] suggested empowering the user to self-exclude himself from overuse of SM as in the gaming industry. Finally, although the *European Commission* representative talked about self-regulation, the *European Commission* has in fact moved towards co-regulation, or enforced institutional self-regulation, and is apparently shifting further towards public regulation.

Taxation is supported by a more diverse range of stakeholders and quite a diverse coalition of states. Although we note here only a few stakeholders supporting the taxation of SM platforms, there is a caveat that should be mentioned. Taxation (typically, 'digital services tax' for SM platforms) has been on the agenda for some time and has already been introduced in some countries (Asen, 2019). Indeed, some indirect forms of regulation, such as a call for taxation of SM platforms seemed to be topical but proved to be short-lived at the EU level in early 2019 again, followed by some initiatives in that direction at the member state level.[12] For example, France has openly declared its determination to tax big digital business regardless of resistance from the US (Thomas, 2020). Thus, some stakeholders may not have considered it necessary to raise this issue again. Taxation can be seen as an indirect levy for the social harms caused by SM (a situation similar to the to-

---

[10] See https://www.facebook.com/journalismproject/facebook-oversight-board-for-content-decisions-overview

[11] Inspired by a Josh Hawley, a Republican Senator from Missouri, who unveiled the *Social Media Addiction Reduction Technology Bill*.

[12] The EC's proposal faced steep opposition from certain EU member states and in early 2019, a year after the proposal was first announced EU member states' finance ministers formally abandoned the proposal. The EC then confirmed that it would focus on the broader international tax discussions underway at the OECD and G20 level, and that if progress was not made by the end of 2020 on global efforts, the EC would revisit the issue (Gibson, Dunn, & Crutcher LLP, 2019)

bacco industry; see e.g. Benioff in Focus (2019). Indeed, as a result, national discourses and adopted policy measures can be different at a national level, although there has been an attempt to coordinate this discussion about digital taxation globally by the *Organisation for Economic Co-operation and Development* (OECD) (see Leonard & Davison, 2020). Moreover, it may not always be clear whether taxation aims, first of all, to protect citizens from social harms caused by SM (preventive role; see e.g. Woira, 2018) or to punish SM for causing social harms (corrective role), or if it is simply a tool for collecting more taxes (financial role). Also, digital services taxation aims more broadly than just at SM – it includes the *Google* parent company, *Alphabet Inc.*, and *Amazon*, for example. Finally, it should be mentioned that there was an unusual approach to taxation in Uganda. Instead of taxing SM platforms, the government taxed SM users (see discussion on this issue in Mutibwa, 2018; Muwema, 2018; Woira, 2018).

Public pressure and public information campaigns are typical tools used for influencing attitudes about policies amongst the general public, or for gaining acceptance of governmental policies by the general public. However, the idea behind public information campaigns goes further here. They are intended, as done by Reporters Without Borders, to support projects that aim at publicly labelling (by experts or journalists) high-quality versus low-quality journalism. The reason behind this approach is that SM has, in many countries, become the key (mis-and dis-)information source for the less educated masses (or citizens not involved in politics on a day-to-day basis). In that sense, this policy is close to, but still distinct from, media/digital/data literacy programmes. Furthermore, there is the crowdsourcing approach as suggested by Pennycook and Rand (2019). This means building audience judgments into an algorithm ranking stories by quality. Implementation may be slow because platform providers may resist this approach, but Dreyer and Ziebarth (2014) argue that the process has many benefits for the providers as well. There is also the manifesto from the Dagstuhl Perspectives Workshop that suggests optimising the role of public values in news recommenders.[13] One can include in this section also short-term boycotts of some SM, or the boycott of advertisements that finance operations of SM. This already happened in 2017 (Statt, 2017; Davies, 2017), had been discussed throughout 2019 (D'Onfro, 2019) and came again on the agenda in 2020 (see Dang, 2020; Hern, 2020; Theile, 2020).

Institutional changes include those discussed earlier and those introduced by France and Denmark in particular. The state institutions have adjusted to the reality of big private players whose impact goes far beyond typical private mass production (e.g. automotive industry). One can include here nation-specific responses (such as special departments affiliated with police, intelligence services, ministries of foreign affairs or other state bodies tackling misinformation in particular or so-

---

[13] Available at https://arxiv.org/abs/2005.09495, posted on 19 May 2020.

cial harms in general), or EU-wide solutions such as the *East Stratcom Task Force* (2015)[14] or the *European Digital Media Observatory* launched in 2020.[15]

Fundamentally, Napoli and Caplan (2017) argue that SM platforms fit quite well within the established parameters of media organisations. SM platforms are not neutral providers; they influence and they already intervene in various areas (Gillespie, 2015). Of course, there are lobbyist groups, but in the case of SM platforms, this is a more fundamental and more political issue. Indeed, almost all SM are on platforms that are both transnational and private (Flew, 2015). Thus, Mazzucato suggests, amongst other ideas, developing a new governance structure, including a new vocabulary. This represents a call for new ways of thinking about an issue. Greer, the deputy director of the *Viral Digital Rights Group*, recommends, amongst other regulatory choices, civil rights audits. We can only assume that this would mean inclusion of NGOs in the process. Similarly, Scalzi, a science fiction writer, would turn the whole system on its head with an intense emphasis on the value of curation by individual users. This idea is discussed further with similar ideas presented in Table 2b, together with Scalzi's additional ideas that are described below within specific rubrics. Shane, an algorithm designer, goes in the same direction as Mazzucato, while Scalzi argues that we need intervention by humans if we want to maintain and curate the digital public spaces according to our wishes. In other words, this seems to be a project of purposefully designed SM with a preference not for market criteria, but for other truly social and democratic ones. Van Alstyne, a professor, develops these somewhat fuzzy ideas further and in a more balanced way. In Van Alstyne's view, the ideal solution is somewhere in between the EU and the US approaches (to have companies create value but taking into consideration the supply side versus demand side).

Finally, Noble suggests that future SM public platforms should set limits on how quickly content circulates, or, as put by Mirani (2020), SM should reintroduce friction into their sharing mechanisms. This is actually one of measures already introduced by *Facebook* – shifting the News Feed to include more posts from friends and family than from publishers. Moreover, *Facebook* reduced clickbait headlines and links to misleading and spam posts, and it has improved how comments are ranked to show people those that are more relevant and of higher quality (Rosen, 2020). These measures reflect an institutional self-regulatory approach as suggested in general terms by some stakeholders.

Regarding the courts as regulators, it is obviously arguable how intensive this approach can be considered from a regulatory perspective. The point for including this stakeholder in this first group of low intensity regulation was that the judiciary is actually already acting as a regulator, especially if there is no other proper regu-

---

[14] See *Countering Disinformation* at https://eeas.europa.eu/headquarters/headquarters-homepage_en/59411/Countering%20disinformation
[15] See https://edmo.eu/

latory option. This may, again, explain why so few stakeholders discussed this option here.

Nation-specific policy solutions, as proposed by Vaidhyanathan (2019), may be seen as necessary if there is no regional (e.g. EU level) or global agreement on SM regulation (e.g. role of OECD regarding taxation of SM). For example, this includes the Australian and German approaches to SM regulation by the law, or the approach to taxation of SM platforms by France and other countries. Thus, nation-specific solutions are typically adopted (usually in the form of a law) or seriously considered by governments that either act in response to an urgent regulatory crisis, show in general more authoritarian tendencies (e.g. Russia, China) or are able to enforce their SM regulation due to their size (meaning big market) and efficient legal and administrative governance (e.g. Germany). There are possibly other examples and reasons why nation-states (including smaller states) or supranational bodies adopt SM regulation, but those mentioned here are perhaps the most typical ones. We shall discuss a unique case of US President Trump's 2020 'de-regulatory' call for specific de-regulation of SM further on.

Now, we turn to the most frequent group of suggestions at the 'medium' intensity level of regulatory policies aimed at social media.

Medium intensity regulatory policies

Table 2b: 2nd Level – Medium Intensity Regulatory Policies

Suggested Regulatory Approach	Supporting Stakeholders				
	Politicians/ states	Experts	Regulators	Journalists	Others
Co-regulation	(it exists at EU level)	Karentay, Smith, Balkin			Aktoudianakis
Shareholders activism					Greer
Transparency/ Data sharing/ Algorithmic Changes	King	Sängerlaub, Zittrain, Mayer-Schönberger, Ognyanova, Owen, Gauci	Buttarelli	Swisher, Hendrix	Brock, Aktoudiana-kis, Tremonti, Brossi
Media/Digital/ Data literacy	Fitzgerald, Hadas-Lebel	Sharockman, Bátky, Pikus, Solano, Jürgen(?), Villmann, Dekov, Michalovová, Gauci		Hadas-Lebel Afoko, Lucas	Open Society Institute, Gibbs

Employee organizing		Tufekci, Tugend			Greer, FB employees actions in October 2019 and again in May/June 2020, Feierstein
Cooperation with fact checkers	Collins		Han Sang-hyuk		
Platforms as public service		Marcuzzi and Terzi, Coatney, Hall, Wu, Weissmann			
Multistake-holderism		Vaidhyanath, Tugend, Barrett, Kendall, Owen, Gutiérrez, Dans, Gauci			Svantesson, the Internet and Jurisdiction Policy Network(?)
International Co-operation		Marcuzzi and Terzi, Melioris, Owen, Gutiérrez			
Independently owned servers/new publicly owned social media	Verhof-stadt	Newport, Tusikov and Haggart, Mazzucato, Noble, Scalzi	Mutabazi		Raddi

Let us start with the most popular category of regulatory suggestion in our sample, which is media/digital data literacy. This has been a buzzword for more than a decade. However, it seems clear that media/digital (or, most recently, data-) literacy is not a sufficient regulatory solution. First, there are always some users who are ignorant or less knowledgeable. Second, choices offered ('please accept these cookies') are sometimes deliberately too complex or time-consuming for the average user to manage (they include multiple levels, sometimes with dozens of 'choices'). Third, there is no way for us to retract information that previously seemed harmless to share (Zittrain, 2018). In general, experience tells us that media literacy can help but cannot stop SM harms of all kinds. Yet, it is always safe to argue that we need more education and enlightenment.

Media/digital literacy is closely related to transparency/data sharing. Fortunately, the EU's GDPR has proven to be useful, at least in preventing the massive abuse of data (European Commission, 2019). Crucially, the GDPR limits the use of algorithmic decision-making. Of course, there are some challenges (see e.g. Houser &

Voss, 2018; Li, Yu & He, 2019). Transparency also includes the issue of how algorithms operate. As put by Hunt and McKelvey (2019, p. 319): 'Thinking of algorithms as policy instruments implies reconsidering coding as policymaking'. No wonder that, in terms of frequency, technical/editorial solutions follow and overlap both media/digital literacy and transparency/data sharing regulatory solutions. It is no coincidence that nearly all experts are amongst the group of stakeholders who support the technological regulatory approach instead of media/data literacy programmes. This is certainly the case amongst the most effective and efficient approaches to regulation, which attempt to overcome human limits and failures. Algorithms represent 'black box policy' by translating its norms and rules into inscrutable and often proprietary systems that cannot be publicly investigated due to intellectual property or security concerns' (p. 319). Most importantly, 'Algorithmic regulation can vary in its efficacy depending on the content …(if there are) enough structural barriers then algorithms may not be effective, or worse, may perpetuate the problem' (p. 319). Hunt and McKelvey (p. 326) also have devised key questions that form a framework to analyse different formulations of algorithmic accountability policy.[16]

There also has been an attempt to simultaneously investigate media/digital literacy, legislation requirements and algorithms. For example, Richardson (2017) focuses on the age limits when accessing SM. Richardson believes that 'there is only one correct way on how to enforce age limits when accessing SM and it is gathering personal data from children and cross matching anything that could inform about the child's age.' Yet at the same time, this is certainly a controversial and potentially problematic regulatory approach as collected data can be accessed by hackers. In contrast, Karentay (2017) has proposed general regulatory principles. In his view, content standards should be interpreted and operationalised on SM platforms through an inclusive mechanism. Although it is not quite clear what this means, Weissmann (2019) perhaps provides an answer, suggesting that it might be useful to consider regulation of SM platforms, as far as the use of data is concerned, in a similar relationship to that which patients or clients have with doctors and lawyers. Weissmann here refers to the 'information fiduciary' model for SM companies as developed by Jack Balkin (Balkin, 2020; Balkin & Zittrain, 2016).

This discussion suggests co-regulatory principles, including 'a system of public accountability'. It is clear that some regulatory suggestions, as well as ideas about multistakeholderism, as presented in Table 2b, overlap with co-regulation. However, co-regulation as an option is explicitly mentioned only by Karentay and Smith from *Microsoft*. In general, multistakeholderism and international cooperation may be seen rather as tools for achieving above-mentioned objectives. In other words, these are not policies *per se*. Be that as it may, the *European Commission* agreed with *Facebook*, *Microsoft*, *Twitter* and *YouTube* (later joined by some other

---

[16] Their questions were: Are inputs to algorithmic systems justified? How do algorithms function as forms of regulation? Are algorithms an appropriate instrument in the known situation or cultural context?

SM) on a 'Code of conduct on countering illegal hate speech online' in 2016. This policy solution can be seen as co-regulation or enforced institutional self-regulation. Yet, there have been debates that this approach may be seen as going against constitutional rights and, in general, that it is not sufficient – there is no due process. Also, this does not cover all the SM, and it mainly covers hate speech (see e.g. Bayer, 2019; Leerssen, 2015). Moreover, public debate is regulated (or not) by private actors operating outside the direct reach of human rights law, while EU policy initiatives combatting illegal content on SM platforms encourage and legitimise the private regime of content regulation (Jørgensen & Zuleta, 2020). International cooperation is the most visible within the current OECD lead discussion on digital taxes.[17]

Multistakeholderism is receiving support amongst recent studies, e.g. Helberger, Pierson and Poell (2018) argue that the enabling of public values in platform-based public activities cannot be adequately achieved by allocating responsibility to one central actor but should be the result of dynamic interaction amongst platforms, users and public institutions. They call it 'a framework of cooperative responsibility' within which they identify four key steps to organise the (re)distribution of responsibilities.[18]

Collin's suggestion for 'formalising Facebook relationship with its third-party fact-checkers in the long term' is, as we have discussed, already a reality.[19] It should be mentioned that there was similar idea raised in (South) Korea. Han Sang-hyuk, chairman of the *Korea Communications Commission*, considered the establishment of an independent institution responsible for checking facts. There is already an extensive international network of fact-checking organisations.[20]

The regulatory proposals discussed so far seem, by and large, to reflect traditional solutions. However, one can also find in this group rather novel and sometimes revolutionary regulatory suggestions. These include internal pressure, from inside the SM platforms, such as employee organising or shareholder activism. There is the example of a prior action in October 2019 when a few hundred employees of *Facebook* raised their voices, calling for different regulation of political ads.[21] This

---

[17] See OECD, Going Digital, https://www.oecd.org/going-digital/topics/tax/
[18] The first step is to collectively define the essential public values at play in particular economic activities and modes of public exchange. The next step is for each stakeholder (platforms, governments, users, advertisers, and others) to accept that they have a role to play in the realisation of these values. The third step is to develop a (multi-stakeholder) process of public deliberation and exchange. The fourth step is to translate the outcome of public deliberation and agreements into regulations.
[19] See *How is Facebook addressing false news through third-party fact-checkers?*, https://www.facebook.com/help/1952307158131536, *Where We Have Fact-Checking. A Map of Face-book's Global Third-Party Fact-Checking Partners*, https://www.facebook.com/journalismproject/programs/third-party-fact-checking/partner-map
[20] See *The International Fact-Checking Network*, https://www.poynter.org/ifcn/
[21] Read the letter Facebook employees sent to Mark Zuckerberg about political ads on 28 October 2019, available at https://www.nytimes.com/2019/10/28/technology/facebook-mark-zuckerberg-letter.html

was certainly a unique action that deserves more attention from analysts and stakeholders. Moreover, there were some publicly raised voices amongst current and former *Facebook* employees regarding *Facebook* policies in spring 2020, following a controversial tweet on social media regulation by President's Trump (Hern & Wong, 2020; Isaac, 2020). One can perhaps include here an already discussed controversial piece published in 2020 (Horwitz & Seetharaman) that revealed internal discussions of *Facebook* employees concerning how *Facebook* has been researching ways to reduce the spread of divisive content on the platform since 2016 (It appears that the first news on this topic was published already in 2016 (Frenkel, 2016). Feierstein (2020) has gone even further, calling for providing whistle-blower protection and rewards to any SM employee willing to provide evidence that leads to the conviction of management or other employees harming society or individuals, and prohibiting government agencies from advertising on SM.

Regarding shareholder activism, this is a rather counter-intuitive idea. Since SM platforms are private enterprises, shareholders are primarily motivated by profit. Thus, it would mean turning capitalism on its head to expect shareholders to go against their own economic interests (see also Balkin, 2020). Of course, it could be possible to get states to intervene here. For example, the states (or a group of states) could become shareholders, either through partial or full nationalisation of some SM (with reimbursement to owners), or by purchasing freely available shares on the stock exchange. Both options are costly.

External pressure from the 'outside' includes suggestions to turn to independently owned servers or new publicly owned SM as well as to change the mission of existing platforms to public service[22] (including, perhaps, the most radical suggestion, the nationalisation of major platforms). For example, Scalzi believes that crowdfunding could create a public broadcasting version of *YouTube*. This is open for further debate as to whether this approach could work. It should be mentioned that, for example, Hungary used to have its own version of *Facebook* called *iWiW*. This network was cancelled in 2014 due to expected financial losses (as a result of competition of other, more technologically advanced platforms) (Leanyfalvi, 2014). On the other hand, for example, the Czech Republic, Slovakia and Poland all have their own national social networks similar to *Facebook*: *pokec.cz*, *pokec.sk* and *NK.pl* (Nasza Klasa), respectively. Yet, the Czech *pokec.cz* and Slovak *pokec.sk*[23] are, comparatively, almost irrelevant as SM platforms, while the Polish *NK* is becoming less popular. The turning point for *NK* came around 2015, when it failed to catch up with constantly technologically evolving *Facebook* (Urbańczyk, 2019). Maybe a pan-European SM platform, funded by public resources (e.g. in coopera-

---

[22] There also is a book by Milborn and Breitenecker (2018). *Change the Game: Wie wir uns das Netz von Facebook und Google zurückerobern, in which the authors argue in favour of cooperation between private platforms and public interests.*
[23] Najväčšia zoznamka na Slovensku (The Biggest Social Platform in Slovakia), https://pokec.azet.sk/?force_login=1&isMobilePokec=1&uri=https%3A%2F%2Fmpokec.azet.sk%2F

tion with public service media) could provide sufficient technological and financial backing for successful development of alternative SM platforms. Yet this would be a risky project as it is well known that habits of SM users change, when some SM become outdated, or are preferred only by certain sectors of population (Havlík, 2018). It is also well known that *Google* (*Alphabet*) failed repeatedly in its attempts to create an attractive SM platform as an alternative to *Facebook*. Shoelace (which was open on an invite-only basis) was *Google*'s most recent attempt to succeed in social space after their failed attempts with *Google Buzz*, *Google Friend Connect*, and *Google+* (Kahla, 2019).

Now we turn to high-intensity regulatory policy proposals that generally reflect traditionally understood public/state regulation.

High-intensity regulatory policies

Table 2c: 3rd Level – High Intensity Regulatory Policies

	Politi-cians/ states	Experts	Regula-tors	Journal-ists	Others
Banning targeted advertisements		Tufekci, Tusikov and Haggart, Owen, Dans, McDonald		Edelman, Mahdawi	Raddi, Dayen
Breaking up the SM platforms/ antitrust legislation	Verhofstadt, some U.S. Senators, Giegold	Morozov, Greer, Doctorow, Hughes, Balkin	Buttarelli	Brodnig	
Data Privacy Legislation	(for EU, there already is GDPR)	Zittrain	Buttarelli	Ivančík	Boskin, Greer, Raddi, Tremonti
Business/ Broadcast-type Regulation	Klöckner, Collins, Porter(?), UK MPs	Marcuzzi and Terzi, Basu	Kukliš		Cohen, Benioff, Křetínský(?)
Fines/Fees		Greer, Balkin(?)	Pitruzzella		Feierstein
Public/state regulation	Orbán, Hadas-Lebel(?) India, Germany, France, UK (EU – Digital Services Act, draft idea)	Tufekci, Mayer-Schönberger, Tufekci(?) Zuckerberg, Berners-Lee, McNamee, Zuboff, Tugend Cook, Balkin, Borata Weissmann	Pitruzzella Mutabazi Buttarelli	Kováčik, Swisher, Hendrix(?), Rodríguez (?), Busse, Esslinger, Bialek	Amnesty International, Soros, Avni

	Jun (China) + many other states				

All regulatory suggestions within this group seem to be based on the law. In any case, they all have in common the idea of applying binding and legally enforceable commitments on the part of SM platforms.

Public/state regulation and business/broadcast-type regulation are not necessarily identical approaches. While the former can take different forms (of which some are presented Table 2c), the latter is more similar to legislation for legacy audio-visual (or, in some cases, print) media. In some cases, public regulation can and does build upon existing institutions, such as antitrust authorities, or can mean revisiting such authorities as the federal *Office of Technology Assessment* in the US as suggested by Weissmann (2019).

It is well known that experts are commonly sceptical about jurisprudence concerning SM issues from a global, or even federal state, perspective. For example, Murray (2017) believes that there remains an unresolvable conflict of laws (i.e. internal/external extra-territorial effects). Similarly, in respect to the US federal context, Fisher, Hutchins and Goodman (2020, pp. 116–117) believe that, if individual state governments were to implement SM regulations, they would likely be ruled unconstitutional in a court of law. If platforms had to conform to 50 different sets of state laws regulating content, this would, first, place a burden on free speech, and second, platforms would have a wide range of local standards to meet, and therefore, the law might suffer from vagueness. US federal laws bring their own set of complications and limitations since any regulation would have to meet the free speech standards of the *First Amendment*. Instead, the authors suggest institutional self-regulation, referring to the famous *Citizens United v. Federal Election Committee* verdict of 2010. The platforms can allow speech to occur at their discretion. In other words, 'There is no constitutional right for a speaker to invoke free speech on Facebook or YouTube or other outlets because the rights to free speech are held by the corporations that own the forum' (Fisher, Hutchins, & Goodman, 2020, p. 119).

Furthermore, Mangan and Gillespie (2017, pp. 3–4) point to two key challenges posed to SM by the law: the gap between the legal treatment of SM and users' understanding of that interplay, and SM casually crossing over the private/public law divide.

Nevertheless, some of the above discussed, law-backed proposals have already partially materialised (e.g. GDPR or AVMSD within EU, or e.g. public/state regulation, especially of broadcast-type, for example, the German *NetzDG* law, applying to companies with more than two million registered users in the country, or the

French 'anti-hate' law from May 2020) (DW, 2020), or are becoming real regulatory options (UK regulatory approach, see Spindler, 2017; Theil, 2019; BBC, 2020). In some cases, however, even year-long discussions and preparations may not be enough to reach consensus on such sensitive legislation, as it happened in Israel in 2018 (Wootliff, 2018).

Indeed, public regulation, or law in different ways in general, seems to be the most recent and probably the final approach to regulation of SM platforms preferred amongst the key stakeholders worldwide (in our sample). The most radical regulatory proposals (mostly by experts and politicians) include breaking up the tech giants or strict imposition of antitrust legislation. In the latter case, there have been such (partly controversial) decisions taken in Germany in early 2019 (see e.g. Schneiders, 2019). Moreover, it should be mentioned that amongst supporters of breaking up *Facebook*, in particular, one can find one of its co-founders, Chris Hughes (2019). At the same time, antitrust authorities in France and Australia have started negotiating with the SM platforms to provide payments to newspaper publishers (Smith, 2020). Thus, antitrust legislation can be used as a tool to make SM platforms behave in a more similar way to that of data curators. It was in this line of thought, although acting independently, that the quickest and highly controversial input to change legal status of SM platforms came from the US in May 2020 in the form of an executive order from the US president. It demands that, if an SM restricts access to others' content and goes beyond removing the types of objectionable content detailed in the law, it should be deemed a publisher rather than a neutral platform – thus losing its legal immunity from lawsuits (Fung, Nobles, & Liptak, 2020). It is possibly only a threat, but it may ultimately become a law, or may have regulatory consequences (Savage, 2020). There are other US draft laws, including the Platform Accountability and Consumer Transparency Act ("PACT Act") suggested by a bipartisan group of US Senators in June 2020, that would require large platforms to explain how they moderate content through a range of mandatory disclosures, and allow consumers to both initiate complaints about content and appeal decisions to remove material, among other issues (see Cohen, 2020; Davis, 2020; Fingas, 2020).

Targeted advertisements are actually EU-regulated, partially by the *E-Commerce Directive* (in case of social marketing influencers), GDPR and the revised AVMSD (with a focus on social media influencers in the latter case). The Italian *Competition and Market Authority* (AGCM) and the German courts were amongst the first to address this issue (see Goanta and Ranchordás, 2020). An overview of experts' opinions suggests that, although banning micro-targeting would help, it would not be a resolution to all the issues related to SM or the internet in general (Edelman, 2020).

Introducing fines (as suggested by a few individuals in our sample) seems to be a way to logically lead to regulation based on law, or at least to state intervention – one cannot really issue a fine to private companies without legal justification and

state backing, at least in a form allowing an appeal to a court in the most contro-versial cases. In fact, it is well known that some major SM platforms have already received huge fines[24] as well as that earlier discussion at the level of the *European Commission* considered issuing huge fines in the case of any breach related to ter-rorist content on SM (Boffey, 2018). Feierstein goes even further when he argues for prohibiting all US federal government agencies from advertising on SM.

Conclusion

The purpose of this article is to provide an exploratory overview and follow-up cat-egorisation of regulatory approaches suggested in respect to the regulation of SM as presented on global and local scales, and in particular within European and US discursive spheres, mainly in the period of 2017–2019. Obviously, this analytical exercise could cover only part of a global and local discourse on this important and rapidly changing regulatory issue. Alternative suggestions for SM regulation are continuously emerging worldwide. Therefore, it should be stressed that this over-view does not provide a complete and complex picture of the global situation in regulatory efforts.

Yet since the suggested indicators or categories seem to be more or less fixed, it is quite possible that we have reached sufficient saturation level for being able to claim representativeness of our sample (in the sense of representing a majority of globally available regulatory suggestions). Moreover, this study has value as a re-flection of an important section of global discussion about regulatory options and trends at a crucial point in history of a new, and from a public discourse/sphere perspective, crucial communication technology. Our initial exploration forms the basis of a more conclusive research as well as aids in determining the research de-sign and sampling methodology (and related challenges) for further, more in-depth or geographically[25], linguistically or temporarily focused research.

Nonetheless, there are some tangible findings. The results of media-facilitated (mainly political, expert and journalistic) discourses on SM regulation suggest that, in the current, rather specialised academic fields, including public regulatory policies specialists, there is a distinct need for more diverse and more innovative regulatory approaches. Moreover, a law may have different content, purpose and enforcement procedures. For example, a law or regulation, in general, may provide incentives or sanctions (see e.g. Agrell, 2015; Balkin & Zittrain, 2016). On the one hand, there is a clear trend (and often reality) towards hard law regulation of SM in many countries, while key SM platforms at the same time, reluctantly, are intro-ducing institutional self-regulatory measures and some co-regulatory measures.

---

[24] See *Antitrust: Commission fines Google €1.49 billion for abusive practices in online advertising*, https://ec.europa.eu/commission/presscorner/detail/en/IP_19_1770

[25] For example, an earlier study by Mutiz, Hoyos, Leguizamón and Gómez (2011) identified three geographically based emerging regulatory models for SM: a) European model, b) US Model c) Latin American model.

There are rare, controversial, emotion-based, but still potentially significant (considering origin and location, as well as market position, of many key SM platforms) calls for no regulation of content on SM as presented by US President Trump in 2020. Ironically, this 'de-regulation' would mean, ultimately, putting SM on the same footing as legacy media. There is some theoretical and empirical rationale behind this change of paradigm. Indeed, the overview of this study has detected that legislation targeting SM is actually being implemented in many countries, while there are at the same time strong arguments made for considering large SM to be at the same level as legacy media.

It should be mentioned that we have identified (but not included here due to space limitation, with exception of US President Trump) some of the marginal voices arguing against any regulation, and in particular against public/state regulation. However, highly knowledgeable stakeholders, such as Tim Berners-Lee (founder of the Internet protocol), Brad Smith (*Microsoft*), Tim Cook (*Apple* CEO) or Mark Zuckerberg (*Facebook* co-founder), have called for more regulation, and specifically for public/state regulation or co-regulation. Nick Clegg, *Facebook*'s head of global affairs said: 'It's not for private companies, however big or small, to come up with those rules. It is for democratic politicians in the democratic world to do so' (AFP, 2019). Most recently, Zuckerberg envisioned some kind of a third regulatory structure that would be positioned somewhere between that of newspapers and telephones (Wintour, 2020).

Voices against SM regulation could have been – perhaps – seen as relevant until the two global scandals mentioned in the introduction, the *Facebook–Cambridge Analytica* scandal and the live broadcasting of the Christchurch massacre on *Facebook*, shook global public opinion. Since then, a tide has shifted towards the need for SM regulation (or, at least, to enforce/adjust existing general penal or civic legislation).

Fundamentally, there is an increasing tendency to enforce traditional law-based (sometimes called 'business') regulation for SM, similar to television and radio broadcast regulation. This is the main trend identified both within a global discourse and in actual regulation in the majority of countries that so far have introduced SM regulation. It is not surprising then that support for this type of regulation comes from the voices of traditional media regulators as well as from politicians (both liberal democratic as well as more authoritarian populist ones). However, this does not necessarily mean that this is the best or the final approach for SM regulation.

As mentioned above, not all types of regulation can be seen as necessarily based directly on (regulatory) legislation. Within our sample, the most innovative stream of suggestions seems to focus on establishing independently owned servers and/or new publicly owned social media. These policy options deal with regulation indi-

rectly, through supporting plurality or competition.[26] Yet, these options may contribute to addressing some of the aspects related to the harm caused by SM only to a very limited degree by putting market and public opinion pressure on major SM platforms. Ultimately, there will still be some need for regulation either for privately or publicly owned platforms.

There are also some relevant technical solutions, such as Noble's proposal that future public platforms should set limits on how quickly content circulates, or how content is prioritised. This may help, and it has actually been partly included in the algorithms used by *Facebook* and some other SM, but it is difficult to imagine how effectively it would work for handling the former issue. There have also been suggestions focused on limiting the time spent on SM by an average user, using direct and indirect motivations ('nudging', providing technical solutions or levelling taxation).

The other traditional regulatory alternatives seem to be focused on breaking up the tech giants and/or enforcing antitrust, and/or copyright and/or data privacy legislation. In the latter case, there were such (partly controversial) decisions taken in Germany in early 2019, while for the former issue, Australia and France are now moving ahead in that direction.

As the discussion on SM regulation continues, we hope that this taxonomy overview and analytical interpretation and contextualisation of identified suggestions for SM regulation can help not only media and communication scholars, but also lawyers, regulatory and policy experts and policymakers to widen their perspectives on SM regulation. There is still time for more debate – it is expected that the targeted 2020 planned comprehensive SM regulation within the EU will not be finalised any sooner than three years after that date (i.e. around 2023), maybe even later (Kukliš in Struhárik, 2020). Although there have already been adopted some national SM regulatory solutions either at the EU member state level, or in many non-EU states, still, for many, the EU (and within the EU, it is Germany) has a special model to follow role, or certainly has global impact,[27] and thus a responsibility within the global regulatory discourses and regulatory efforts (see e.g. Schulze, 2019).

---

[26] For an alternative, and within the EU a widely used competion-based approach, see a Fair, Reasonable and Non-Discriminatory (FRAND) access regime, in Heim and Nikolic (2019).

[27] For example, Zuckerberg mentioned during his hearing in the Congress of the US on 11 April 2018, by answering a question about GDPR:"All the same controls will be available around the world." Available at https://docs.house.gov/meetings/IF/IF00/20180411/108090/HHRG-115-IF00-Transcript-20180411.pdf, p. 52.

References

Afoko, C. (2019). Government can't regulate Facebook – it's up to all of us. *The Guardian*. Retrieved from https://www.theguardian.com/commentisfree/2019/apr/01/government-regulate-facebook-mark-zuckerberg-social-media

AFP (2019, June 14). *Governments must regulate social networks: Facebook's Clegg*. Agence France-Presse. https://www.newvision.co.ug/news/1502493/governments-regulate-social-networks-facebooks-clegg

Agrell, P. J. (2015). Incentive Regulation of Networks. Concepts, Definitions and Models. *Reflets et perspectives de la vie économique*, *54*(1), 103–132.

Aktoudianakis, A. (2019, January 31). The liberal answer to the crisis in social media. *Economist*. https://www.economist.com/open-future/2019/01/31/the-liberal-answer-to-the-crisis-in-social-media

Amamukirori, B. (2017, April 1). Lawyers asked to help government draft social media regulatory laws. *New Vision*. https://www.newvision.co.ug/news/1450010/lawyers-help-government-draft-social-media-regulatory-laws

Asen, E. (2019). *Announced, Proposed, and Implemented Digital Services Taxes in Europe*. Tax Foundation. https://taxfoundation.org/digital-taxes-europe-2019/

Avni, M. L. (2015, December 5). Stop incitement: Regulate social media. *The Times of Israel*. https://blogs.timesofisrael.com/stop-incitement-regulate-social-media/

Balkin, J. & Zittrain, J. (2016, October 3). A Grand Bargain to Make Tech Companies Trustworth. *The Atlantic*. https://www.theatlantic.com/technology/archive/2016/10/information-fiduciary/502346/

Balkin, J. M. (2020). *How to Regulate (and Not Regulate) Social Media*. The Knight First Amendment Institute. https://knightcolumbia.org/content/how-to-regulate-and-not-regulate-social-media

Basu, K. (2019, October 31*). How to Tame Big Tech*. *Project Syndicate*. https://www.project-syndicate.org/commentary/warren-sanders-break-up-big-tech-antitrust-by-kaushik-basu-2019-10

Bátky, Z. (2018). *Miért túlfújt lufi a Facebook adatkezelési botránya? (vélemény)* [Why is the Facebook data management scandal an overblown balloon?] PCWorld.

Bayer, J. (2019, May). *Between Anarchy and Censorship. Public discourse and the duties of social media*. CEPS Paper in Liberty and Security in Europe No. 2019-03. CEPS. https://www.ceps.eu/wp-content/uploads/2019/05/LSE2019-03_Between-Anarchy-and-Censorship.pdf
https://pcworld.hu/pcwlite/facebook-adatkezeles-botrany-lufi-velemeny-245665.html

BBC (2019, January 27). *Mental health: UK could ban social media over suicide images, minister warns*. BBC News. https://www.bbc.com/news/uk-47019912

BBC (2020, February 12). *Social media: How do other governments regulate it?* BBC News. https://www.bbc.com/news/technology-47135058

Benoit, K., & Matsuo, A. (2019). *Network analysis of Brexit discussion on social media*. The EUENGAGE Working Paper Series. http://www.euengage.eu/euengage-working-paper-series/

Benton, J. (2019, April 3). The Guardian's nifty old-article trick is a reminder of how news organizations can use metadata to limit misinformation. *Niemanlab*. https://www.niemanlab.org/2019/04/the-guardians-nifty-old-article-trick-is-a-reminder-of-how-news-organizations-can-use-metadata-to-limit-misinformation/

Berners-Lee, T. (2019). *30 years on, what's next #ForTheWeb?* World Wide Web Foundation. https://webfoundation.org/2019/03/web-birthday-30/

Bialek, C. (2019, July 17). Wir brauchen dringend einen Wirkstoff gegen die Allmacht der Algorithmen [We urgenly need an active ingredient against the omnipotence of the algorithms]. *Handelsblatt*. https://www.handelsblatt.com/meinung/kommentare/kommentar-wir-brauchen-dringend-einen-wirkstoff-gegen-die-allmacht-der-algorithmen/24595410.html

Boffey, D. (2018, September 13). Remove terror content or be fined millions, EU tells social media firms. *The Guardian.* https://www.theguardian.com/media/2018/sep/13/social-media-firms-could-face-huge-fines-over-terrorist-content

Borata, J. (2018, March 2). *La regulación de las redes sociales: ¿quién se encarga?* [Regulation of social networks: who is in charge?]. Eldiario. https://www.eldiario.es/tribunaabierta/regulacion-sociales-plataformas-Europa-desafios_6_745835452.html

Boskin, M. J. (2018, April 25). The Future of Tech Policy. *Project Syndicate.* https://www.project-syndicate.org/commentary/future-of-tech-policy-regulation-by-michael-boskin-2018-04

Bowles, N. (2020, June 5). The Complex Debate Over Silicon Valley's Embrace of Content Moderation. *The New York Times.* https://www.nytimes.com/2020/06/05/technology/twitter-trump-facebook-moderation.html

Braithwaite, J. (2017). Types of responsiveness. In P. Drahos (Ed.), *Regulatory Theory: Foundations and applications* (pp. 117–132). ANU Press.

Brock, G. (2017, October 16). *How to regulate Facebook and the online giants in one word: transparency.* The Conversation. https://theconversation.com/how-to-regulate-facebook-and-the-online-giants-in-one-word-transparency-85765

Brodnig, I. (2019, July 4). Facebook regulieren: Wie viel Aufsicht darf es sein? [Facebook to regulate: How much oversight is allowed?]. *Der Standard.* https://www.derstandard.at/story/2000105879585/facebook-regulieren-wie-viel-aufsicht-darf-es-sein

Brossi, L. (2020, February 21). Regulación y redes sociales [Social Media Regulation]. *La Tercera.* https://www.latercera.com/opinion/noticia/regulacion-redes-sociales/1017835/

Bulger, M., & Davison, P. (2018). *The Promises, Challenges, and Futures of Media Literacy.* Data & Society Research Institute. https://datasociety.net/pubs/oh/DataAndSociety_Media_Literacy_2018.pdf

Busse, C. (2019, January 9). Kalkulierte Aufregung [Calculated excitement]. *Süddeutsche Zeitung.* https://www.sueddeutsche.de/digital/aufregung-social-media-konzerne-regulierung-1.4280532

Carvalho, A. (2000). *Discourse analysis and media texts: a critical reading of analytical tools* [Conference presentation]. International Conference on Logic and Methodology – International Sociology Association, 33, Köln, Germany. http://hdl.handle.net/1822/3137

Ciglerová, J. (2020, June 12). Trump bohato plní ruské očakávania [Trump exceeds Russian Expectations]. *Denník N*, 24.

Coatney, M. (2019, September 24). We Need a PBS for Social Media. *The New York Times.* https://www.nytimes.com/2019/09/24/opinion/public-broadcasting-facebook.html

Cohen, C. (2020, June 29). *PACT Act Would Deny Section 230 Immunity in Certain Instances and Impose Greater Transparency, Process, and Enforcement Mandates.* Covington. https://www.insideprivacy.com/social-media/pact-act-would-deny-section-230-immunity-in-certain-instances-and-impose-greater-transparency-process-and-enforcement-mandates/

Dang, S. (2020). Exclusive: Facebook ad boycott campaign to go global, organizers say. *Reuters.* https://ca.reuters.com/article/idCAKBN23Z0O4-OCATC

Dans, E. (2020, March 22). It's time to ban data pimping and targeted advertising. *Medium.* https://medium.com/enrique-dans/its-time-to-ban-data-pimping-and-targeted-advertising-e074919eb3b6

Davies, J. (2017, April 4). The YouTube ad boycott concisely explained. *Digiday.* https://digiday.com/uk/youtube-ad-boycott-concisely-explained/

Davis, W. (2020, June 24). New Bill Would Require Platforms To Disclose Content Removal Policies. *MediaPost.* https://www.mediapost.com/publications/article/352970/new-bill-would-require-platforms-to-disclose-conte.html

Dayen, D. (2018, April 10). Ban Targeted Advertising. *The New Republic.* https://newrepublic.com/article/147887/ban-targeted-advertising-facebook-google

Dekov, D. (2018, April 2). *IT специалист: Facebook се разви бързо без да има закони за него (ивидео*

Dizikes, P. (2019, January 28). *Want to squelch fake news? Let the readers take charge. Study shows audience judgments can identify online misinformation.* Science Daily. https://www.sciencedaily.com/releases/2019/01/190128161506.htm

Doctorow, C. (2019, June 6). Regulating Big Tech makes them stronger, so they need competition instead. *The Economist.* https://www.economist.com/open-future/2019/06/06/regulating-big-tech-makes-them-stronger-so-they-need-competition-instead

D'Onfro, J. (2019). Advertisers Boycott YouTube — And If History Is A Guide, They'll Be Back Soon. *Forbes.* https://www.forbes.com/sites/jilliandonfro/2019/02/21/advertisers-boycott-youtube--and-if-history-is-a-guide-theyll-be-back-soon/#550b4bfb7a96

Doval, P. (2019, November 22). New IT rules to make traceability of content must: Government. *The Times of India.* http://timesofindia.indiatimes.com/articleshow/72176395.cms

Dreyer, S. & Ziebarth, L. (2014). Participatory Transparency in Social Media Governance: Combining Two Good Practices. *Journal of Information Policy, 4,* 529–546. doi:10.5325/jinfopoli.4.2014.0529

DW (2020, May 13). France passes disputed law on online hate speech. *Deutsche Welle.* https://www.dw.com/en/france-passes-disputed-law-on-online-hate-speech/a-53429587

Eckert, S., Mannheim, F., & Steinhäuser, M. (2020, February 9). Medienanstalten fordern mehr Regulierung [Media regulatory authorities support more regulation]. *Tageschau.* https://www.tagesschau.de/investigativ/ndr-wdr/eu-soziale-netzwerke-101.html

Edelman, G. (2020, March 22). Why Don't We Just Ban Targeted Advertising? *Wired.* https://www.wired.com/story/why-dont-we-just-ban-targeted-advertising/

Epstein, R. (2017, April 10). Why We Shouldn't Worry About Fake News. *Sputnik News.* https://sputniknews.com/analysis/201704101052488618-fake-news-fact-check-google-facebook/

Esslinger, D. (2019, June 9). Soziale Netzwerke müssen reguliert werden [Social Networks must be regulated]. *Süddeutsche Zeitung.* https://www.sueddeutsche.de/digital/luebcke-social-media-facebook-hass-hetze-regulierung-1.4478951

European Commission (2019, July 24). *Communication from the Commission to the European Parliament and the Council. Data Pro-tection Rules as a Trust-enabler in the EU and Beyond – Taking Stock* (COM/2019/374 final). https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52019DC0374&from=EN

Fairclough, N. (2006). *Language and globalization.* Routledge

Feierstein, M. (2020, May 29). *Hit them ever harder, Mr. President! The tyranny of Big Tech is the biggest threat to democracy in our lifetime.* RT. https://www.rt.com/op-ed/490112-hit-them-president-tyranny-big-tech/

Fingas, (2020, June 24). Senate bill aims to boost accountability for Section 230 without gutting it. *engadget.* https://www.engadget.com/senate-pact-act-section-230-bill-225702210.html

Fisher, M., Hutchins, D., & Goodman, M. (2020). Regulating Social Media and the Internet of Everything: The Precedent of the Radio Act of 1927. *Communication Law Review, 19*(1), 100–129.

Fitzgerald, F. (2018, October 21). I was exonerated - but we must act to halt the avalanche of lies and vilification. *Irish Independent.* https://www.independent.ie/opinion/analysis/i-was-exonerated-but-we-must-act-to-halt-the-avalanche-of-lies-and-vilification-37441867.html

Fletcher, R., & Selva, M. (2019, November 25). *How Brexit referendum voters use news.* Reuters Institute. https://reutersinstitute.politics.ox.ac.uk/risj-review/how-brexit-referendum-voters-use-news

Flew, T. (2015). Social media governance. *Social Media + Society (1)*1. https://doi.org/10.1177/2056305115578136

Focus (2019, January 26). Experte warnt vor Risiken: Ist Facebook so schädlich wie Rauchen? [Expert warns : Is Facebook as detrimental as smolking ?] *Focus*. https://www.focus.de/gesundheit/gesundleben/fitness/experte-warnt-vor-risiken-ist-facebook-so-schaedlich-wie-rauchen_id_10237116.html

Frenkel, S. (2016, November 14). Renegade Facebook Employees Form Task Force To Battle Fake News. *BuzzFeed*. https://www.buzzfeednews.com/article/sheerafrenkel/renegade-facebook-employees-form-task-force-to-battle-fake-n

Frenkel, S., Confessore, N., Kang, C., Rosenberg, M. & Nicas, J. (2018, November 14). Delay, Deny and Deflect: How Facebook's Leaders Fought Through Crisis. *The New York Times*. https://www.nytimes.com/2018/11/14/technology/facebook-data-russia-election-racism.html

Fung, B., Nobles, R., & Liptak, K. (2020, May 29). *Trump's executive order targeting social media companies*. CNN. https://edition.cnn.com/2020/05/28/politics/read-social-media-executive-order/index.html

Galante, L., & Ee, S. (2018, September). *Defining Russian Election Interference: An Analysis of Select 2014 to 2018 Cyber Enabled Incidents*. Atlantic Council. https://www.atlanticcouncil.org/in-depth-research-reports/issue-brief/defining-russian-election-interference-an-analysis-of-select-2014-to-2018-cyber-enabled-incidents/

Gauci, I. (2020, January 26). Will 2020 be the year of reckoning for social media regulation? *Times of Malta*. https://timesofmalta.com/articles/view/will-2020-be-the-year-of-reckoning-for-social-media-regulation.765930

Geiß, S. (2018). The dynamics of media attention to issues: Towards standardizing measures, dimensions, and profiles. In P. Vasterman (Ed.), *From Media Hype to Twitter Storm* (pp. 83–114). Amsterdam University Press.

Geist, R. (2019). Nedbanlivosť [Negligence]. *Pravda*. https://nazory.pravda.sk/dnes-pise/clanok/515699-nedbanlivost/

Gibbs, A. (2019, March 21). Instagram's disturbing 'thinspiration' pictures fueled my anorexia – but there'sno point trying to regulate it. *The Independent*. https://www.independent.co.uk/voices/anorexia-instagram-bbc-eating-disorders-social-media-regulation-a8833631.html

Gibson, Dunn & Crutcher LLP (2019, June 20). *Taxing the Digital Economy and Digital Service Tax Proposals Im-pacting the United Kingdom and the European Union*. https://www.gibsondunn.com/taxing-digital-economy-and-digital-service-tax-proposals-impacting-the-uk-and-eu/

Giegold, S. (2019). Grünen-Politiker fordert Zerschlagung von Facebook [The Green Politician Supports Breaking-up Facebook]. *Focus*. https://www.focus.de/digital/dldaily/ueberbordende-macht-gruenen-politiker-fordert-zerschlagung-von-facebook_id_10248471.html

Gillespie, T. (2015). Platforms intervene. *Social media + Society (1)*1. https://doi.org/10.1177/2056305115580479

Goanta, C., & S. Ranchordás (Eds.) (2020). *The Regulation of Social Media Influencers*. Edward Elgar Publishing.

Goda, J. (2020). V čom sa mýli Eduard Chmelár, keď sa obáva boja proti dezinformáciám [In what is Eduard Chmelár wrong when he is afraid of fight against disinformation]. *Dennik N*. https://dennikn.sk/1890152/v-com-sa-myli-eduard-chmelar-ked-sa-obava-boja-proti-dezinformaciam/

Greer, E. (2019, May 8). Mark Zuckerberg has to go. Here are 25 reasons why. *The Guardian*. https://www.theguardian.com/commentisfree/2019/may/08/markzuckerberg-has-to-go

Griffith, James (2019, April 4). *Australia passes law to stop spread of violent content online after Christ-church massacre*. CNN. https://edition.cnn.com/2019/04/04/australia/australia-violent-video-social-media-law-intl/index.html

Grigonis, H. K. (2018, February 19). Governments are stepping in to regulate social media, but there may be a better way. *Digital Trends*. https://www.digitaltrends.com/social-media/social-network-should-governments-moderate/

Guo, B. (n.d.). *Strong Weibo, Smart Government: Governmentality and the Regulation of Social Media in China* [Unpublished doctoral dissertation]. The University of Adelaid.

Gutiérrez, J. C. B. (2019, July 4). *La regulación de las redes sociales digitales desde el enfoque jurídico del órgano garante de la Ciudad de México* [Social Media Regulation in Jurisdiction of City of Mexico]. Foro Juridico. https://forojuridico.mx/la-regulacion-de-las-redes-sociales-digitales-desde-el-enfoque-juridico-del-organo-garante-de-la-ciudad-de-mexico/

Hadas-Lebel, R. (2018). Macron proti "fake news" [Macron Against "fake news"]. *SME*. https://komentare.sme.sk/c/20750968/ako-macron-bojuje-proti-fake-news.html

Hänska-Ahy, M., & Bauchowitz, S. (2017). Tweeting for Brexit: how social media influenced the referendum. In J. Mair, T. Clark, N. Fowler, R. Snoddy, & R. Tait (Eds.), *Brexit, Trump and the Media* (pp. 31–35). Abramis academic publishing.

Havlík, A. (2018, April 10). *Jak se vyvíjely sociální sítě posledních 14 let? Graf sleduje popularitu nejoblíbenějších webů internetu* [How SM have evolved in the last 14 years?] Refresher. https://refresher.sk/53336-Jak-se-vyvijely-socialni-site-poslednich-14-let-Graf-sleduje-popularitu-nejoblibenejsich-webu-internetu?gdpr-accept=1

Heath, R., & Štrba, P. (2019). *Diskusia Politico: Kto bude novým šéfom Európskej komisie?* [Politico Discussion: Who is going to be a new President of the Commmission?] Aktuality. https://www.aktuality.sk/clanok/687164/europsky-parlament-volby-diskusia-politico-aktuality/

Heim, M., & Nikolic, I. (2019). A FRAND Regime for Dominant Digital Platforms, 10. *Journal of Intellectual Property, Information Technology and E-Commerce Law, 10*(1). https://www.jipitec.eu/issues/jipitec-10-1-2019/4883

Heinla, E. (2018). *Elvin Heinla: aeg on ulatada Eesti ajakirjandusele abikäsi* [Elvin Heinla: It's time to extend the helping hand to the Estonian press]. Arvamus. https://arvamus.postimees.ee/4451151/elvin-heinla-aeg-on-ulatada-eesti-ajakirjandusele-abikasi?_ga=2.246163075.662550525.1527128219-1423607879.1527128219a

Heitmann, M. (2018). *Falsche Skandalisierung eines Skandals* [Wrong scandalization of a Scandal]. Cicero. https://www.cicero.de/datenmissbrauch-datenskandal-facebook-cambridge-analytica-demokratie-parteien-beeinflussung-manipulation-waehler

Helberger, N., Pierson, J., & Poell, T. (2018). Governing online platforms: From contested to cooperative responsibility, *The Information Society, 34*(1), 1–14.

Hendrix, J. (2018, February 15). *The Age of Unregulated Social Media is Over*. Just Security. https://www.justsecurity.org/52346/age-unregulated-social-media/

Hern, A. (2020, June 24). Facebook to be hit by its largest ever advertiser boycott over racism. *The Guardian*, https://www.theguardian.com/business/2020/jun/24/ben-and-jerrys-joins-facebook-advertising-boycott-racism

Hern, A. (2019). UK queries Facebook decision to exempt political statements from fact-checking. *The Guardian*. https://www.theguardian.com/technology/2019/oct/22/uk-facebook-nick-clegg-decision-to-exempt-political-statements-from-fact-checking?

Hern, A., & Wong, J. C. (2020, June 1). Facebook employees hold virtual walkout over Mark Zuckerberg's refusal to act against Trump. *The Guardian*. https://www.theguardian.com/technology/2020/jun/01/facebook-workers-rebel-mark-zuckerberg-donald-trump

Ho, B., & Liu, P. (2015). Herd journalism: Investment in novelty and popularity in markets for news. *Information Economics and Policy, 31*, 33–46. https://doi.org/10.1016/j.infoecopol.2015.04.004

Horwitz, J., & Seetharaman, D. (2020, May 26). Facebook Executives Shut Down Efforts to Make the Site Less Divisive. *The Wall Street Journal.* https://www.wsj.com/articles/facebook-knows-it-encourages-division-top-executives-nixed-solutions-11590507499

Houser, K., & Voss, W. (2018). GDPR: The End of Google and Facebook or a New Paradigm in Data Privacy? *Richmond Journal of Law and Technology, 25*(1).

Hunt, R., & McKelvey, F. (2019). Algorithmic Regulation in Media and Cultural Policy: A Framework to Evaluate Barriers to Accountability. *Journal of Information Policy, 9*, 307–335.

Hughes, Ch. (2019, May 9). It´s Time to Break Up Facebook. *The New York Times.* https://www.nytimes.com/2019/05/09/opinion/sunday/chris-hughes-facebook-zuckerberg.html

Hyun-kyung, K. (2019, December 8). 'Fake News Battle' makes case for regulation. *The Korea Times.* https://www.koreatimes.co.kr/www/culture/2020/06/135_279886.html

Hyun-bin, K. (2020, January 1). Government regulations urgent for provocative one-person media. *The Korea Times.* https://www.koreatimes.co.kr/www/nation/2020/06/113_281008.html

Institute for Policy Analysis of Conflict (2015). *Online Activism and Social Media Usage Among Indonesian Extremists* (pp. 1-26). Institute for Policy Analysis of Conflict. www.jstor.org/stable/resrep07806.1

Isaac, M. (2020, June 3). Early Facebook Employees Disavow Zuckerberg's Stance on Trump Posts. *The New York Times.* https://www.nytimes.com/2020/06/03/technology/facebook-trump-employees-letter.html

Issacharoff, A. (2015). The Facebook intifada? Many terrorists aren't on the social network. *The Times of Israel,* https://www.timesofisrael.com/the-facebook-intifada-many-terrorists-arent-on-facebook/

Ivančík, M. (2018, June 26). Strata súkromia bolí, strata verejnosti zabíja [The Loss of Privacy Causes a Pain, Loss of Publicness Kills]. *Pravda.* https://nazory.pravda.sk/analyzy-a-postrehy/clanok/474538-strata-sukromia-boli-strata-verejnosti-zabija/

Jančárik, P. (2019). Facebook im platí za odhaľovanie klamstiev: Nedokážeme to robiť dosť rýchlo [Facebook is paying them for fact-checking: We are unable to keep pace]. *Dennik N.* https://dennikn.sk/1454845/odhaluje-lzi-na-internete-media-by-sa-mali-snazit-viac-odlisit-od-tvorcov-hoaxov/

Jørgensen F., & Zuleta, L. (2020). Private Governance of Freedom of Expression on Social Media Platforms. *Nordicom Review, 41(*1), 51–67. https://doi.org/10.2478/nor-2020-0003

Jun, A. (2018, April 1). Governments worldwide explore internet management. *Global Times.* http://www.globaltimes.cn/content/1096201.shtml

Jungherr, A., Possegga, O., & An, J. (2019). Discursive Power in Contemporary Media Systems: A Comparative Framework. *The International Journal of Press/Politics, 24*(4), 404–425.

Jürgen, L. (2018, March 6). *Advokaat soovitab: ABC teadmised küberhügieenist nii ema, isa kui ülemuse seisukohalt* [Lawyer recommends: ABC's knowledge of cyber hygiene for both mom's, dad's and boss's perspective]. Arileht. http://arileht.delfi.ee/news/uudised/advokaat-soovitab-abc-teadmised-kuberhugieenist-nii-ema-isa-kui-ulemuse-seisukohalt

Kahla, C. (2019, July 15). Google introduces Shoelace, a social network to rival Facebook. *TheSouthAfrican.com.* https://www.thesouthafrican.com/technology/google-shoelace-social-network-rival-facebook/

Karentay (2017, October 24). How Should Governments Regulate Facebook and other Social Media Platforms? Proposing a New Paradigm to Regulation. *Technology and Public Good.* https://techandpublicgood.com/2017/10/24/how-should-governments-regulate-facebook-and-other-social-media-platforms-proposing-a-new-paradigm-to-regulation/

Karp, P. (2019, November 20). Christian Porter calls for Facebook and Twitter to be treated as publishers. *The Guardian.* https://www.theguardian.com/australia-news/2019/nov/20/christian-porter-calls-for-facebook-and-twitter-to-be-treated-as-publishers

Käsper, K. (2018, March 25). *Frankensteini Facebook ründab demokraatiat ja inimese vabadust* [Frankestein's Facebook is attacking democracy and the person's freedom]. Esti Paevaleht 25.
http://epl.delfi.ee/news/arvamus/frankensteini-facebook-rundab-demokraatiat-ja-inimese-vabadust

Katsirea, I. (2018). "Fake news": reconsidering the value of untruthful expression in the face of regulatory uncertainty. *Journal of Media Law, 10*(2), 159–188.

Kavenna, J. (2019, October 4). Shoshana Zuboff: 'Surveillance capitalism is an assault on human autonomy'. *The Guardian.*
https://www.theguardian.com/books/2019/oct/04/shoshana-zuboff-surveillance-capitalism-assault-human-automomy-digital-privacy

Klöckner, J. (2017). Julia Klöckner fordert Regeln für Soziale Netzwerke (Julia Klöckner supports Social Media regulation). *Focus.*
https://www.focus.de/regional/mainz/landtag-julia-kloeckner-fordert-regeln-fuer-soziale-netzwerke_id_6627098.html

Kollárová, Z. (2019, November 21). Internetoví giganti u nás neplatia dane, no Dankovo volanie po digitálnej dani teraz nemá význam [Internet Giants do not pay taxes here, however Danko´s call for digital taxation does not have any meaning]. *Dennik N.*
https://e.dennikn.sk/1660295/internetovi-giganti-u-nas-prakticky-neplatia-dane-no-dankov-navrh-na-digitalnu-dan-teraz-nema-vyznam/

Kováčik, M. (2018). Zodpovednosť (Responsibility). *Pravda.* https://nazory.pravda.sk/autor/15-kovacik-martin/

Kukliš, Ľ. (2019, March 29). *Ľuboš Kukliš: Je načase, aby sa regulačné iniciatívy začali zaoberať sociálnymi médiami. Interview with Petronela Sevčíková* [Ľuboš Kukliš: It is Time for Regulatory Initiatives to tackle social media. Interview with Petronela Sevčíková]. HNonline. https://strategie.hnonline.sk/media/1915409-novy-audiovizualny-zakon-zasiahne-aj-youtube-a-facebook

Leanyfalvi, V. (2014, 19 May). *IWIW, The Hungarian Social Network Closes After 12 Years of Success. Daily News Hungary.* https://dailynewshungary.com/iwiw-the-hungarian-social-network-closes-after-12-years-of-success/

Leerssen, P. (2015). Cut Out By The Middle Man: The Free Speech Implications of Social Network Blocking and Banning in the EU. *Journal of Intellectual Property, Information Technology and E-Commerce Law, 6*(2). https://www.jipitec.eu/issues/jipitec-6-2-2015/4271

Lenski, G. (1994). Societal Taxonomies: Mapping the Social Universe. *Annual Review of Sociology, 20*(1), 1–26.

Leonard, J., & Davison, L. (2020, June 2). U.S. Starts Probe into Digital Tax Plans from EU to India. *Bloomberg.*
https://www.bloomberg.com/news/articles/2020-06-02/u-s-to-initiate-tariff-probe-into-india-spain-over-digital-tax

Li, H., Yu, L., & He, W. (2019). The Impact of GDPR on Global Technology Development. *Journal of Global Information Technology Management, 22*(1), 1–6.

Lievens, E. (2016). Is Self-Regulation Failing Children and Young People? Assessing the Use of Alternative Regulatory Instruments in the Area of Social Networks. In S. Simpson, M. Puppis, & H. van den Bulck (Eds.), *European Media Policy for the Twenty-First Century. Assessing the Past, Setting Agendas for the Future* (pp. 77–94). Routledge.

Lomas, N. (2019, November 22). *Watch Sacha Baron Cohen skewer Zuckerberg´s "twisted logic" on hate speech and fakes.* Techcrunch. https://techcrunch.com/2019/11/22/watch-sacha-baron-cohen-skewer-zuckerbergs-twisted-logic-on-hate-speech-and-fakes/

Lucas, E. (2018, June 13). *Pirmsvēlēšanu laiks un digitālā vide: kā nekļūt par viltus ziņu upuri?* TVnet. https://www.tvnet.lv/4518568/pirmsvelesanu-laiks-un-digitala-vide-ka-neklut-par-viltus-zinu-upuri

Lumu, D. (2016, June 22). Mutabazi calls for regulation of Facebook, Twitter. *New Vision.* https://www.newvision.co.ug/news/1427569/mutabazi-calls-regulation-facebook-twitter

33

Mahdawi, A. (2019, November 5). Targeted ads are one of the world's most destructive trends. Here's why. *The Guardian*. https://www.theguardian.com/world/2019/nov/05/targeted-ads-fake-news-clickbait-surveillance-capitalism-data-mining-democracy

Malik, O. I. (2019). Online Freedom. Asia News Network commentators call for measures to prevent spread of unverified information. *The Straits Times*.
https://www.straitstimes.com/asia/regulate-when-social-media-turns-unsocial

Mangan, D., & Gillespie, L. E. (2017). Introduction. In D. Mangan, & L. E. Gillies (Eds.), *The Legal Challenges of Social Media* (pp. 1–12). Edward Elgar Publishing.

Marcus, L. P. (2018, May 1). Facing Facebook's Responsibility, 1-10. *Project Syndicate*.
https://www.project-syndicate.org/commentary/facebook-privacy-governance-failure-zuckerberg-by-lucy-p--marcus-2018-05

Marcuzzi, S., & Terzi, A. (2019). Ako skrotiť nadnárodné korporácie [How to Regulated Transnational Corporations]. *SME*.
https://komentare.sme.sk/c/22063461/ako-skrotit-nadnarodne-korporacie.html

Marcuzzi, S., & Terzi, A. (2019, February 1). Are Multinationals Eclipsing Nation-States? *Project Syndicate*. https://www.project-syndicate.org/onpoint/are-multinationals-eclipsing-nation-states-by-stefano-marcuzzi-and-alessio-terzi-2019-01

Martin, X. J. (2018). The Virtual Panopticon in China: Surveillance Through the Securitisation of the Internet. *Mapping China Journal*, (2), 62–74.

Mazzucato, M. (2019, October 2). Preventing Digital Feudalism. *Project Syndicate*.
https://www.project-syndicate.org/commentary/platform-economy-digital-feudalism-by-mariana-mazzucato-2019-10

McDonald, C. (2019, December 19). Social media advertising: Ban targeted ads not political ads. *Verdict*. https://www.verdict.co.uk/social-media-advertising-political-ban/

McNamee, R. (2018, February 1). Feťáci a díleri sociálnych médií [Drug_dealers and Social Media Dealers]. SME. https://komentare.sme.sk/c/20749553/fetaci-a-dileri-socialnych-medii.html

Meier, A. (2018). *Valesüüdistused valeuudistes: nii diktatuurid kui Eesti poliitikud kuritarvitavad mõistet vastaste suu sulgemiseks* [False accusations in false news both dictatorships and Estonian politicians misuse the term to close the opponents' mouths]. Esti Paevaleht 25.
http://epl.delfi.ee/news/arvamus/valesuudistused-valeuudistes-nii-diktatuurid-kui-eesti-poliitikud-kuritarvitavad-moistet-vastaste-suu-sulgemiseks

Melioris, L. (2019, April 18). Patriot je proti daňovej suverenite Slovenska [Patriot is against Tax Sovereignty of Slovakia]. *SME*. https://komentare.sme.sk/c/22098306/patriot-je-proti-danovej-suverenite-slovenska.html

Michalovová, N. (2019). Ako dezinformácie podkopávajú demokraciu [How disinformation undermines democracy]. *Pravda*.
https://nazory.pravda.sk/analyzy-a-postrehy/clanok/519766-ako-dezinformacie-podkopavaju-demokraciu/

Miles, M. B., & Huberman, A. M. (1994). *Qualitative data analysis: An expanded sourcebook* (2nd ed.). Sage Publications, Inc.

Mirani, L. (2020, June 29). No more going viral: why not apply social distancing to social media? *The Guardian*.
https://www.theguardian.com/commentisfree/2020/jun/29/social-distancing-social-media-facebook-misinformation

Morozov, E. (2019, May 11). It's not enough to break up Big Tech. We need to imagine a better alternative. *The Guardian*.
https://www.theguardian.com/commentisfree/2019/may/11/big-tech-progressive-vision-silicon-valley

Muhangi, K. (2018, April 23). Why we should worry about data protection. *New Vision*.
https://www.newvision.co.ug/news/1476197/worry-about-protection

Murgia, M. (2019). EU draws up sweeping rules to curb illegal online content. *Financial Times*.
https://www.ft.com/content/e9aa1ed4-ad35-11e9-8030-530adfa879c2

Murray, A.D. (2017). Mapping the rule of law for the internet. In D. Mangan and L. E. Gillies (Eds.), *The Legal Challenges of Social Media* (pp. 13–36). Edward Elgar Publishing.

Mutibwa, I. (2018, July 9). Understanding the Social Media Tax. *New Vision*. https://www.newvision.co.ug/news/1481151/taxation-digital-platforms-otts-taxation-uganda-international-experience

Mutiz, P. L. A., Hoyos, J. A. N., Leguizamón, F. G., & Gómez, C. C. (2011). Modelos de regulación jurídica de las redes sociales virtuales [Models of legal regulation for virtual networks). *La revista Via Iuris*, (11), 109–136.

Muwema, F. (2018, April 19). Levy new social media tax on Facebook... not users. *New Vision*. https://www.newvision.co.ug/news/1475966/levy-social-media-tax-facebook-users

Napoli, P. M., & Caplan, R. (2017). Why media companies insist they're not media companies, why they're wrong, and why it matters. *First Monday, 22* (5). https://firstmonday.org/ojs/index.php/fm/article/download/7051/6124

Newport, C. (2019, May 18). Can "Indie" Social Media Save Us? *The New Yorker*. https://www.newyorker.com/tech/annals-of-technology/can-indie-social-media-save-us

Newton, C. (2020, May 28). How to think about polarization on Facebook. *sup.news*. https://sup.news/how-to-think-about-polarization-on-facebook/

Newitz, A. (2019, November 30). A better internet is waiting for us. *The New York Times*, pp.11–12.

Nicol, W. (2020, June 9). Study: Facebook is skimping on moderation, and it's harming the public. *Digital Trends*. https://www.digitaltrends.com/news/new-report-argues-facebook-and-other-platforms-are-too-lax-on-moderation/

Nye, J. S. (2018, December 5). Is Fake News Here to Stay? *Project Syndicate*. https://www.project-syndicate.org/commentary/fake-news-part-of-the-background-by-joseph-s--nye-2018-12

Ognyanova, N. (2018). Facebook и отговорността за съдържанието [Facebook and responsibility for content]. *Nellyo*. https://nellyo.wordpress.com/2018/04/05/facebook-11/

Olausson, U. (2013). Theorizing Global Media as Global Discourse. *International Journal of Communication, 7*, 1281–1297.

Orbán, B. (2018, March 21). Hogyan politizál a közösségi média? [How do social media politicize?]. *Mandiner*. http://mandiner.hu/cikk/20180321_orban_balazs_hogyan_politizal_a_kozossegi_media

Owen, T. (2018, December 28). Big Tech's net loss: How governments can turn anger into action. *The Globe and Mail*. https://www.theglobeandmail.com/opinion/article-big-techs-net-loss-how-governments-can-turn-anger-into-action/

Pakistan Press Foundation (2020, February 21). Regulating Social Media. The Dilemma. *Argentina News*. https://www.argentinanews.net/news/264092626/regulating-social-media-the-dilemma#

Parker, D., & Kirkpatrick, C. (2012). *Measuring Regulatory Performance. The Economic Impact of Regulatory Policy: A Literature Review of Quantitative Evidence* (Expert Paper No. 3). OECD. https://www.oecd.org/gov/regulatory-policy/3_Kirkpatrick%20Parker%20web.pdf

Pennycook, G., & Rand, D. G. (2019). Fighting misinformation on social media using crowdsourced judgments of news source quality. *Proceedings of the National Academy of Sciences 116*(7), 2521–2526.

Pikus, M. (2018, April 1). Máte strach zo sledovania? Dostanem vás z toho na tri ťahy' [Are you afraid of being monitored? I'll get you out of it for three moves]. *Dennik N*. https://dennikn.sk/1082195/mate-strach-zo-sledovania-dostanem-vas-z-toho-na-tri-tahy/

Raddi, G. (2019). *Nationalize Facebook*. Politico. https://www.politico.eu/article/nationalize-facebook-data-privacy-hackers-advertisement-social-media/

Raud, R. (2018, March 19). Rein Raud: humanitaaria muudab inimesed raskemini programmeeritavaks [Rein Raud: Humanities make people more difficult to program]. *Kultuur*. https://kultuur.err.ee/690628/rein-raud-humanitaaria-muudab-inimesed-raskemini-programmeeritavaks

Reeves, B., Ram, N., & Robinson, T. N. (2020, January 15). *Screen time: Conclusions about the effects of digital media are often incomplete, irrelevant or wrong*. The Conversation. https://theconversation.com/screen-time-conclusions-about-the-effects-of-digital-media-are-often-incomplete-irrelevant-or-wrong-129960

Reiter, B. (2017). Theory and Methodology of Exploratory Social Science Research. *International Journal of Science and Research Methodology 5*(4), 129–150.

Richardson, J. (2017, November 29). Children's rights expert Richardson warns against new rules for Facebook. *The Slovak Spectator*. https://spectator.sme.sk/c/20706825/childrens-rights-expert-richardson-warns-against-new-rules-for-facebook.html

Rodríguez, C. (2018, April 21). Usted es el producto [You are a Product]. *El Tiempo*. https://www.eltiempo.com/opinion/columnistas/cecilia-rodriguez/usted-es-el-producto-recolleccion-de-datos-por-facebook-y-google-207744

Rosen, G. (2020, May 27). *Investments to Fight Polarization*. Facebook. https://about.fb.com/news/2020/05/investments-to-fight-polarization/

Savage, C. (2020, June 2). Trump's Order Targeting Social Media Sites, Explained. *The New York Times*. https://www.nytimes.com/2020/05/28/us/politics/trump-twitter-explained.html

Savage, P. (2017). *Russian Social Media Information Operations How Russia has Used Social Media to Influence US Politics*. American Security Project. https://www.jstor.org/stable/resrep06042

Schneiders, P. (2019). Unbedingt abwehrbereit, aber bedingt zuständig? Eine interdisziplinäre Evaluation der Facebook-Entscheidungdes Bundeskartellamts vor dem Hintergrund der Konvergenz von Wettbewerbs- und Datenschutzrecht. *UFITA – Archiv für Medienrecht und Medienwissenschaft, 83*(1), 238–278.

Schmid, A. (2019, October 7). Is Breaking Up Amazon, Facebook, and Google a Good Idea? *Boston University Today*. http://www.bu.edu/articles/2019/break-up-big-tech/

Schönberger, V. M. (2018). Wow! Total Information Supervision! *Profil*. https://www.profil.at/shortlist/gesellschaft/viktor-mayer-schoenberger-facebook-interview-9842407

Schulze, E. (2019, June 7). *If you want to know what a US tech crackdown may look like, check out what Europe did*. CNBC. https://www.cnbc.com/2019/06/07/how-google-facebook-amazon-and-apple-faced-eu-tech-antitrust-rules.html

Schutz, P. (2018, September 11). Je čas, aby Google a Facebook začali platiť [It is Time for Google and Facebook to Pay]. *SME*. https://komentare.sme.sk/c/20911826/je-cas-aby-google-a-facebook-zacali-platit.html

Scott, M. (2019). Want to regulate Big Tech? Sorry, Europe beat you to it. *Politico*. https://www.politico.eu/article/regulate-tech-europe-tax-competition-privacy/

Slezáková, M. (2018, March 8). *Potřebujeme veřejnoprávní facebook, pryč od trhu, efektů a emocí, říká průzkumník fake news* [We need PSM Facebook, off markert, effects, and emotions, says fake news researcher]. iRozhlas. https://www.irozhlas.cz/zpravy-svet/rozhovor-fake-news-dezinformace-alex-sangerlaub-jeden-svet-media_1803080600_mls

Smith, B. (2019a). A tragedy that calls for more than words: The need for the tech sector to learn and act after events in New Zealand. *Microsoft*. https://blogs.microsoft.com/on-the-issues/2019/03/24/a-tragedy-that-calls-for-more-than-words-the-need-for-the-tech-sector-to-learn-and-act-after-events-in-new-zealand/

Smith, B. (2020, May 10). Big Tech Has Crushed the News Business. That's About to Change. *The New York Times*. https://www.nytimes.com/2020/05/10/business/media/big-tech-has-crushed-the-news-business-thats-about-to-change.html

Smith, R. C. (2019b). Fake news, French Law and democratic legitimacy: lessons for the United Kingdom? *Journal of Media Law, 11*(1), 52–81.

Solano, V. (2019, January 21). ¿Regular o no regular las redes sociales? [To regulate or not to regulate social networks?]. *Razon Publica*. https://razonpublica.com/regular-o-no-regular-las-redes-sociales/

Soros, G. (2018). *George Soros: sotsiaalmeedia juhib inimesi iseseisvast mõtlemisest loobuma, kaalul on tsivilisatsiooni saatus* [George Soros: social media leads people to give up independent thinking, it is a matter of the destiny of our civilization]. Esti Paevaleht 25. http://epl.delfi.ee/news/arvamus/george-soros-sotsiaalmeedia-juhib-inimesi-iseseisvast-motlemisest-loobuma-kaalul-on-tsivilisatsiooni-saatus?id=81352943

Spindler, G. (2017). Internet Intermediary Liability Reloaded – The New German Act on Responsibility of Social Networks and its (In-) Compatibility with European Law. *Journal of Intellectual Property, Information Technology and E-Commerce Law, 8*(2). https://www.jipitec.eu/issues/jipitec-8-2-2017/4567

Statt, N. (2017, March 24). YouTube is facing a full-scale advertising boycott over hate speech. *The Verge*.
 https://www.theverge.com/2017/3/24/15053990/google-youtube-advertising-boycott-hate-speech

Struhárik, F. (2020, May 22). Reguláciu sociálnych sietí nebudeme mať skôr ako o tri roky, vraví Ľuboš Kukliš z licenčnej rady [There won´t be SM regulation any sooner than in three years from now, says Ľuboš Kukliš from the Media Council]. *Denník N.* https://dennikn.sk/1903309/regulaciu-socialnych-sieti-nebudeme-mat-skor-ako-o-tri-roky-vravi-lubos-kuklis-z-licencnej-rady/

Svantesson, D. J. B. (2019). *It's vital we clamp down on online terrorism. But is Ardern's 'Christchurch Call' the answer?* The Conversation. https://theconversation.com/its-vital-we-clamp-down-on-online-terrorism-but-is-arderns-christchurch-call-the-answer-117169

Swisher, K. (2018). Battling fires and the tech inferno. *The New York Times*, International edition, p. 13–14.

The Guardian (2017, April 27). Thai mother saw daughter being killed on Facebook Live. *The Guardian*.
 https://www.theguardian.com/world/2017/apr/27/thai-mother-watched-daughter-being-killed-on-facebook-live

The Local (2017, April 25*)*. 'Facebook rape video' trio sentenced to prison. *The Local*.
 https://www.thelocal.se/20170425/facebook-rape-video-trio-sentenced-to-prison

Theil, S. (2019). The Online Harms White Paper: comparing the UK and German approaches to regulation. *Journal of Media Law, 11*(1), 41–51.

Theile, G. (2020, June 29). Boykott der Werbe-Schwergewichte [Boycott from Heavy-Weights of Advertisers]. *FAZ*.
 https://www.faz.net/aktuell/wirtschaft/digitec/firmen-stoppen-facebookwerbung-boykott-der-werbe-schwergewichte-16838475.html

Thomas, E. (2019, April 2). *Government shouldn't rush social media regulation*. Australian Strategic Policy Institute. https://www.aspistrategist.org.au/government-shouldnt-rush-social-media-regulation/

Thomas, L. (2020, May 14). France to impose digital tax this year regardless of any new international levy. *Reuters*.
 https://www.reuters.com/article/us-france-digital-tax-idUSKBN22Q25B

Tremonti, G. (2018, November 7). Digital world needs to be regulated: web tax indispensable. *Corriere de la Sera*. https://www.corriere.it/english/18_novembre_07/digital-world-needs-to-be-regulated-web-tax-indispensable-865be2e2-e29f-11e8-86b9-0879a24c1aca.shtml

Tufekci, Z. (2018a, August 16). It's the (Democracy-Poisoning) Golden Age of Free Speech. *Wired*. https://www.wired.com/story/free-speech-issue-tech-turmoil-new-censorship/

Tufekci, Z. (2018b, December 17). Yes, Big Platforms Could Change Their Business Models. *Wired*. https://www.wired.com/story/big-platforms-could-change-business-models

Tugend, A. (2019, November 11). Fervor Grows for Regulating Big Tech. *The New York Times*. https://www.nytimes.com/2019/11/11/business/dealbook/regulating-big-tech-companies.html

Tusikov, N., & Haggart, B. (2019). It's time for a new way to regulate social media platforms. *The Conversation*.
 https://theconversation.com/its-time-for-a-new-way-to-regulate-social-media-platforms-109413

Urbańczyk, A. (2019). *Czy Nasza-klasa.pl to cmentarzysko profili?* [Is Nasza-klasa.pl a profile cemetery?]. White Press. https://www.whitepress.pl/baza-wiedzy/254/czy-nasza-klasa-pl-to-cmentarzysko-profili

37

U.S. Senate Select Committee on Intelligence (2019). Report of the Select Committee on Intelligence. Russian Active Measures Campaigns and Interference in the 2016 U.S. Election Volume 1: Russian Efforts against Election Infrastructure with Additional Views (Report II6-XX). United States Senate.
https://www.intelligence.senate.gov/sites/default/files/documents/Report_Volume1.pdf

Vaidhyanathan, S. (2019, April 28). Regulating Facebook will be one of the greatest challenges in human history. *The Guardian*.
https://www.theguardian.com/commentisfree/2019/apr/28/regulating-facebook-will-be-one-of-the-greatest-challenges-in-human-history

Vaismoradi, M., Jones, J., Turunen, H., & Snelgrove, S. (2016). Theme development in qualitative content analysis and thematic analysis. *Journal of Nursing Education and Practice, 6* (5), 100–110.

Valášek, L. (2019, February 16). Eurokomisařka Jourová: Zákony by se měly dodržovat i na sociálních sítích [EU commissionair Jourová: The law should be followed also at SM]. *idnes*. https://www.idnes.cz/zpravy/zahranicni/eurokomisarka-eu-evropska-unie-jourova.A190214_092044_zahranicni_fort

Verhofstadt, G. (2019, January 1). Facebook potrebuje naozajstnú reguláciu [Facebook needs real Regulation]. *SME*. https://komentare.sme.sk/c/22018745/facebook-potrebuje-naozajstnu-regulaciu.html

Villmann, U. (2018, February 5). *Eesti edukaim reklaamiguru: mis maailma päästmine? Igal asjal on papi lõhn Juures* [Estonia's most successful advertising guru: what is the salvation of the world? Everything has a smell of money]. Arileht. http://arileht.delfi.ee/news/uudised/eesti-edukaim-reklaamiguru-mis-maailma-paastmine-igal-asjal-on-papi-lohn-juures?id=81005521

Weimann, G. (2014). New Terriorism and New Media. Wilson Center.
https://www.wilsoncenter.org/sites/default/files/media/documents/publication/STIP_140 501_new_terrorism_F.pdf

Weissmann, S. (2019). How not to regulate social media. *The New Atlantis* (58), 58–64

Wenwen, W. (2018, August 28). Internet management standard must fit national norms. *Global Times*. http://www.globaltimes.cn/content/1117454.shtml

Williams, S. (2019, July 9). *Denmark plans regulation of influencers following suicide note. BBC News*. https://www.bbc.com/news/world-europe-48928012

Wintour, P. (2020, February 15). Mark Zuckerberg: Facebook must accept some state regulation. *The Guardian*. https://www.theguardian.com/technology/2020/feb/15/mark-zuckerberg-facebook-must-accept-some-state-regulation

Woira, M. (2018, April 13). Yes, let social media be taxed. *New Vision*.
https://www.newvision.co.ug/news/1475558/yes-social-media-taxed

Wootliff, R. (2018, July 18). Unwitting Israeli MKs almost pass law allowing sweeping internet censorship. *The Times of Israel,* https://www.timesofisrael.com/unwitting-israeli-mks-almost-passed-law-allowing-sweeping-internet-censorship/

Wu, T. (2018, April 3). Don't Fix Facebook. Replace It. *The New York Times*.
https://www.nytimes.com/2018/04/03/opinion/facebook-fix-replace.html

Zittrain, J. (2018, April 7). Mark Zuckerberg Can Still Fix This Mess. *The New York Times*.
https://www.nytimes.com/2018/04/07/opinion/sunday/zuckerberg-facebook-privacy-congress.html

Zuckerberg, M. (2019, March 30). Facebook founder speaks out amid fears over election advertising and rise of far right. *The Guardian*.
https://www.theguardian.com/technology/2019/mar/30/mark-zuckerberg-calls-for-stronger-regulation-of-internet.

Appendix 1

Global and Local Narratives for Regulating Social Media

Author/Country	Policy Suggestions
Sullivan (2013)[28] *Sky Deutschland* head Country: Germany	We have to learn how to deal with the (social) media.
Avni (2015) son of a terrorism victim Country: Israel	We must require social media companies to proactively remove all incitement to violence and establish heavy civil and criminal penalties for failure to comply.
Pitruzzella (2016)[29] *AGCOM* head Country: Italy	Regulation of misinformation on the internet is best done by the state, rather than by social media companies such as *Facebook*. He also suggested the creation of an EU independent body to label fake news and remove it from circulation or impose fines when necessary.
Mutabazi (in Lumu, 2016; Amamukirori (2017) executive director of *Uganda Communications Commission* (UCC) Country: Uganda	He has rooted for strict regulation of social platforms such as *Facebook*, *Twitter* and *Whatsapp*. „We need a future network that unites us as Africans, manned in Africa, so that we are also able to protect our own people,"
Richardson (2017) *Council of Europe*	There is only one correct way on how to enforce age limits when accessing social media and it is gathering personal data from children and cross matching anything that could inform about the child's age. Social media providers will also need to track their location to know which age requirement applies.
Karentay (2017) IT expert Country: USA	First, content standards should be interpreted and operationalized on social media platforms through an inclusive mechanism. Second, Governments and social media companies should establish a system of public accountability. Third, governments and social media companies should both make commitments, and be held jointly accountable, to public goals.
Klöckner (2017) politician (CDU) Country: Germany	To put social media on equal regulatory level with legacy media.
Brock (2017) researcher, Department of Journalism, University of London Country: UK	At the minimum, a high degree of transparency from platforms should be required, not just about the algorithms they use, but also about all aspects of their operations.
Jourová in Valášek (2018) *European Commissionair*	I prefer self-regulation. SM platforms should follow existing law as well as how hate speech is defined by courts, clearly mark political ads, delete fake accounts, but leave political speech free.

[28]   Found in: https://www.focus.de/finanzen/news/gestaendns-von-brian-sullivan-sky-deutschland-chef-meidet-facebook-und-google-plus_aid_1130842.html
[29]   Found in: Freedom on the Net, Italy, (2018), https://freedomhouse.org/report/freedom-net/2018/italy

Author/Country	Policy Suggestions
European Union	
Lucas (2018) Journalist; CEPA vice-president Country**:** Latvia	The solution to fake news is education and vigilance from all parts of society.
Meier (2018) EP's Adviser to the *ALDE Group on Culture, Education, Media and Sport European Union*	The rules governing the legacy media should apply to *Facebook* as well.
Heinla (2018) Kantar Emor research expert Country: Estonia	Trustworthiness is a clear advantage of national legacy media and therefore PSM must continue to be supported (when facing negative aspects of social media platforms).
Heitmann (2018) writer; journalist Country: Germany	Freedom of information also includes the right to influence others and also to be influenced by oneself, the key is to learn how to handle it properly.
Ognyanova (2018) lawyer Country: Bulgaria	There are two important conditions for the safe operation of social networks - transparency, regarding the issues of the platform, trends and how it moves over time and an independent appeal process.
Borata (2018) expert in media law Country: Spain	There is a growing tendency in international law to recognize and emphasize the responsibility, also, of private actors and corporations in the adequate protection of human rights. For this reason, it is up to the public authorities to guarantee, first of all, that the internal or community standards of social networks are, in terms of content, clear and precise and do not contain unreasonable, arbitrary or may give rise to excessive limitations on users' freedom of expression. Secondly, it is also necessary to guarantee, through adequate regulatory mechanisms, that the internal procedures for content removal, account deactivation or other similar actions are transparent, proportionate, and allow the intervention of those affected, with the possibility also of go to impartial appeals.
Jürgen (2018) attorney-at-law Country: Estonia	A parent is a person who is responsible for the child's safety. (including on social media)
Boskin (2018) Professor of Economics at Stanford University Country: USA	The goal should be to limit the downsides of technology without stifling innovation – five issues to consider e.g. privacy.
Habeck (2018)[30] politician (Green party) Country: Germany	A more advanced anti-monopoly legislation.
Villmann (2018) creative director Country: Estonia	Be aware whether social media discourse presents minority opinion (more likely) or majority opinion (less likely).
Hughes (2019)	Called *Facebook* a monopoly that should be forced to spin off

---

[30] Found in: https://www.focus.de/politik/deutschland/nach-datenmissbrauch-gruenen-chef-habeck-will-gegen-facebook-vorgehen_id_8697209.html

Author/Country	Policy Suggestions
Facebook co-founder Country: USA	WhatsApp and Instagram, with future acquisitions banned for several years. - a new federal agency to regulate tech companies whose "first mandate is to protect privacy."
Dekov (2018) Business Intelligence Expert Country: Bulgaria	The advice to everyone is to get acquainted with the social security options of any social network. From time to time it is worthwhile to visit them again because social networks and technologies are evolving.
Wu (2018) law professor Country: USA	The ideal competitor and successor to *Facebook* would be a platform that actually puts its goals first ("bring us closer together" and "build a global community.").
Jun (2018) Country: China	Without proper supervision and management from the government, major tech companies will simply take their customers' privacy as no big deal.
Woira (2018) self-defined „Pan Africanist" Country: Uganda	The reason I will stick to supporting the issue of taxing SM is that at least this noise will decrease ….because it will increase our revenue in the coffers so we get reasonable services. …..
Muwema (2018) lawyer Country: Uganda	It is my argument that by proposing a further tax on SM users instead of the SM platform owners, the Governmentt of Uganda has missed the silver lining.
Mutibwa (2018) Head of Tax, Banking and Finance at *Signum Advocates* Country: Uganda	The digital platforms need to be taxed. Whether the direct tax is the best way to have the same addressed is a question of discussion.
Muhangi (2018) managing partner of the *Ortus* (K Muhangi Advocates) Technology, Media, Telecommunications and Intellectual property Law practitioner Country: Uganda	Without adequate data protection laws or national data security and retention policies, there can be no assurance that your personal data will not end up in the wrong hands. Data protection is globally recognised as a distinct fundamental human right.
Ivančík (2018) historian Country**:** Slovakia	Data protection regulation.
Raud (2018), scholar; author Country: Estonia	Ensure maximum possible plurality of opinions with equal status on social media.
Käsper (2018) lecturer of European Law Country: Estonia	A strict law of political advertising, greater transparency of messages and targets, and informing users are needed.
Dayen (2018) author Country: USA	To disallow all individually targeted ads, with large fines or even removal from the public airwaves for repeated violations. Nothing tied to a user's identity should be used to serve them a particular message. Companies would have to make all ads on its networks publicly viewable and searchable, so regulators can oversee them.

Author/Country	Policy Suggestions
Marcus (2018) Professor of Leadership and Governance Country: UK	*Facebook* needs to take responsibility for its behaviour in a way befitting its influence, by changing its governance and operational behaviour.
Tremonti (2018) citizen Country: Italy	What is fundamental is not only the protection of "privacy", but more generally the protection of the integrity of the "person" in the digital dimension… For once, instead of insisting on regulating as little as possible, the *European Commission* has seriously embarked on the right path, not only by proposing a web tax, but also with proposed regulations to guarantee the transparency of platforms to the benefit of the small and medium enterprises that use them.
Tufekci (2018b) social media expert Country: USA/Turkey	We should discuss outlawing invasive digital tracking (online or offline), merging data from multiple sources, and maybe even micro-targeting based on surveillance. We could also use some real employee pressure.
Hendrix (2018) Executive Director of *NYC Media Lab* Country: USA	Greater transparency to governments and independent researchers. Accountability to citizens. Responsibility for addressing externalities.
Soros (2018) philantropist/investor Country: USA/international	SM should be regulated more strictly, to maintain competition, innovation as well as fair and equitable access to services.
Open Society Institute (2018) Country: Bulgaria	Since it appears that there is important correlation between quality education and freedom of the media on the one hand, and trust in fake news and hoaxes, more support should be given to quality education and freedom of the media.
McNamee (2018) Investor; venture capitalist; musician Country: USA	Public regulation and education.
Křetínský (2018) Billlionaire; enterpreneur Country: France/Czech Republic	The role of the press is crucial for understanding complexities of world. There also is a need for regulating SM – aren't these medium, if they have four million followers? It s time to change rules of the game. The Czech Republic is too small to enforce new regulation for SM, that is why I have invested in the French media market.
Zittrain (2018) Harvard professor; co-founder of the *Berkman Klein Center for Internet & Society* Country: USA	SM platforms should introduce practices and technologies aimed at a sea change on user privacy and autonomy.
Hadas-Lebel (2018) author; politician Country**:** France	Better media literacy and new categorisation of social platforms that would give them editorial responsibility.
Mayer-Schönberger (2018) researcher Country: Austria/UK	First, better privacy through direct state control. Second, data sharing obligation. *Facebook* has to make a random part of its data accessible to competitors in order to break its informational power.

Author/Country	Policy Suggestions
Pikus (2018) IT expert Country: Slovakia	Try to learn how to set up the level of privacy.
Orbán (2018) civil servant Country: Hungary	A good regulation cannot be achieved without the intervention of the state.
Sängerlaub (in Slezáková, 2018), journalist; researcher Country: Germany	It is important to be transparent, especially the media.
Bátky (2018) editor-in-chief *PC review* Country: Hungary	One cannot expect the social media to make their rules of data protection stricter forever, otherwise we can end up with blurred *Facebook* profile pictures, or a three-round verification process needed to post a picture of a cat.
Nye (2018) political scientist Country: USA	Investigative journalism and alerting the public in advance can help inoculate voters against disinformation campaigns.
Schutz (2018) journalist Country: Slovakia	To pay regular taxes. (it is well-known that social media platforms pay only symbolic taxes)
Kováčik (2018) journalist Country: Slovakia	Public regulation.
Cook (2018) Apple CEO Country: USA	**...** we have to admit when the free market is not working. And it hasn't worked here.
Rodríguez (2018) journalist Country: Colombia	The situation is crying out for regulation.
Owen (2018) Beaverbrook Chair in Media, Ethics; Communication and associate professor in the *Max Bell School of Public Policy* at McGill University Country: Canada	The governments can bring sunlight to the world of micro-targeted advertising through new transparency laws. They can overhaul data-privacy regimes that are limited in scope, weak in capacity and unco-ordinated globally. They can mandate the identification of automated accounts so that citizens know when they are engaging with a machine or a human. They can modernize tax and competition policy for the digital economy. And they can fund large-scale digital literacy initiatives for citizens of all ages. This is going to require bringing together the private sector and civil society in a hard discussion about the nature and limits of free speech, about who is censored online and how, about responsibilities for moderating speech at scale, and about universal versus national speech norms. Democracies will need to start co-ordinating their public-policy efforts around emerging technologies, too. There is currently a disconnect between the global scale, operation and social impact of technology companies and the national jurisdiction of most countries' tech laws and regulations. As former *BlackBerry* co-CEO Jim Balsillie has argued, the digital economy may need its Bretton Woods moment.
Tusikov and **Haggart** (2019) academics	First, it's necessary to prohibit the data-intensive, micro-targeted advertising-dependent business model that is at the heart of the problem.

Author/Country	Policy Suggestions
Country: Canada	Second, it's vital that countries craft rules that are appropriate to their particular domestic social, legal and political contexts. Third, and most provocatively, it's time to consider non-commercial ownership of social-media entities — including non-profit or some form of public ownership
Afoko (2019) Activist; Strategic communications specialis Country: UK	But ultimately no regulation of tech giants will work unless users are involved.
Barrett (in Grigonis, 2018) Deputy Director at the *NYU Center for Business Rights and Human Development* Country: USA	While SM platforms shouldn't be held liable for such content, the research suggests the platforms can — and should — do more to regulate content. The legislation to apply the same laws to social media ads that apply to political ads on the TV and radio, is one example of laws that wouldn't overreach. But, if SM companies step up their efforts against politically motivated misinformation and terrorist propaganda, government involvement wouldn't be necessary. SM networks should enhance their own governance, continue to refine the algorithms, use more "friction" — like warnings and notifications for suspicious content — expand human oversight, adjust advertising, and continue to share knowledge with other networks to reach those goals.
Reporters without Borders (2018, 2019)	Journalism Trust Initiative Publicly labelling high quality versus low quality journalism.
Thomas (2019) researcher at ASPI's *International Cyber Policy Centre* Country: Australia	Regulators should consider when tackling violent content online: First, conceptual clarity. What are we trying to achieve, and is this the best way to achieve it? Second, technical feasibility. How will it work in practice, and is it really going to be an improvement on the current situation? Third, regulators need to consider adverse consequences. For example, an increased crackdown by the big social media players will not take this content offline; it will simply disperse it more widely.
Gutiérrez (2019) President of the *Institute of Transparency, Access to Public Information, Protection of Personal Data and Accountability* of Mexico City (INFO) Country: Mexico	We conclude that s a joint regulation through norms built in the international community and directed to the interior of the States, for which it is necessary and it is urgent to carry out a comprehensive diagnosis involving specialized authorities and bodies, academics, civil society, the technical community, and the private sector, among other actors at the local level, aimed at a national scale and subsequently at an international level, so that in this area, the bases are developed that allow, in principle, the enforceability of digital rights.
Swisher (2019), journalist; editor at large for the technology news website *Recode* Country: USA	Suggestions for tech industry CEOs: Embrace transparency, hold leaders accountable, avoid groupthink, invest in diversity, don´t be afraid of self-reflection.
Benton (2019) director of the *Nieman Journalism Lab* Country: UK	In order to decrease misinformation, it is useful to make a story´s age more prominent, both to readers and to those who might only see a link on social media without clicking through.

Author/Country	Policy Suggestions
Fitzgerald (2019) politician Country: Ireland	All media, and particularly PSM must look into how they handle group-think.
Melioris (2019) economist Country: Slovakia	Taxation, international cooperation.
Esslinger (2019) journalist Country: Germany	SM must be regulated.
UK MPs (2019)[31] Country: UK	UK MPs call for social media content regulator financed by a special levy.
Michalovová (2019) lawyer Country: Slovakia	Media and digital literacy.
Kukliš (2019) media regulator Country: Slovakia (and ERGA)	Business-type regulation (SM seen as something between traditional media and service providers).
Marcuzzi and **Terzi** (2019) researchers international	International co-operation, platforms as a public service, business-type regulation.
Mahdawi (2019) journalist Country: UK	We need to crack down on the use of personal information for all targeted advertising.
Han Sang-hyuk (in Hyun-kyung, 2019), chairman of the *Korea Communications Commission* Country: Korea	He considered the establishment of an independent institution responsible for checking facts. It would then brief a fake news committee about their findings. Then the committee would send findings to respective media outlets to help them self-regulate fake news.
In Hyun-bin (2020) Country: Korea	Participants of the forum held at the *National Assembly* in November 2019: The nation needs to make education on media ethics mandatory at schools, and have media content providers, both individuals and companies, receive such education as well.
Doctorow (2019) author; tech activist Country: UK	One possibility is to create an absolute legal defence for companies that make "interoperable" products (from ad-blocking to switching app) stores that plug into the dominant companies' offerings. Use antitrust to promote interoperability.
Vrabel (in *ČTK*, *iDNES.cz*, 2019) Director, Semantic Visions Country: Czech Republic	SM platforms should have the same responsibility as publishers.
Verhofstadt, 2019 and **Verhofstadt** (in Heath & Štrba, 2019) EU Parliament	We need a European *Facebook*, an update of antimonopoly legislation, transparency of algorithms, breaking up big technology companies

[31] Found in: https://www.ft.com/content/600a4cde-32c5-11e9-bb0c-42459962a812

Author/Country	Policy Suggestions
Gibbs (2019) citizen Country: UK	What we really need is for adults to stop condemning social media sites, and start trying to understand them rather than trying to block it from view.
Sharockman (in Jančárik, 2019) Country: USA	He supports rather self-regulation (by platforms) then regulation by governments. The governments should provide access to trustworthy and reliable information, including support to journalism and media literacy. Journalists should provide sources and facts.
Giegold (2019) MEP for Germany (Green pary)	To use anti-monopoly legislation.
Brodnig (2019) journalist, author Country: Austria	The EU should use anti-trust legislation.
Malik (2019) journalist Country: Pakistan	The prior restraint model is an obsolete mechanism to regulate free speech on social networks. If speech needs be regulated, it should be by judicial determination, and not executive decisions. Combating fake news should be done through public information campaigns which sensitise the population on the need to fact-check their sources of online content.
Raddi (2019) MD/PhD student Country: USA	A combination of existing policy tools — heavily taxing private social media companies, for example, and banning targeted advertisement and the use of personal information for commercial gain — would softly sentence *Facebook* to death. Especially if they are combined with new, high-quality public social media alternatives.
Greer (2019) Deputy Director of the viral digital rights group *Fight for the Future* Country: UK	Hefty fines, civil rights audits, antitrust, data privacy legislation, shareholder activism and employee organizing.
Scott (2019) tech journalist *Politico*	In the race to regulate Big Tech, there is one rule of thumb - whoever moves first gets to write the rules.
Geist (2019) journalist Country: Slovakia	Either efficient self-regulation or, for example, to raise criminal negligence charges.
Solano (2019) communication consultant Country: Colombia	It is preferable to work intensively in educating users.
Danko (2019) politician in Kollárová Country: Slovakia	Taxation.
Morozov (2019) writer; researcher Country: USA	Breaking up the tech giants, having them pay a fair share of taxes, making better use of their data are all necessary but, alas, insufficient conditions for effective social – not just individual or institutional – transformation.
Vaidhyanathan (2019) professor of Media Studies Country: UK	Each country will have to assess how its social, cultural and political health is affected by *Facebook*. Each will have to approach Facebook as part of an information ecosystem, connected intimately with other systems of expression and media forms like television and news services. Each will have to assess how much power it wants *Facebook*

Author/Country	Policy Suggestions
	to have in that ecosystem. Each will have to deploy an array of responses to mitigate the negative consequences of *Facebook* while recognizing its value in people's lives.
Tufekci (2018a) writer; academic; techno-sociologist Country**:** Turkey/USA	These are deeply political decisions.
Zuckerberg (2019) *Facebook* founder Country: USA	We need a more active role for governments and regulators. A new regulation is needed in four areas – harmful content, election integrity, privacy and data portability.
Government of India (Doval, 2019) Country: India	The government is all set to make changes to the IT rules which will make it mandatory for SM and ISP to provide traceability of those posting information on their platforms as well as to remove malicious content receiving a court order, or when notified by the government. Finally, it will be a must for companies with more than 50 lakh users to have an office in India and appoint a nodal officer for liaising with law enforcement agencies.
Smith (2019a) *Microsoft*'s President and Chief Legal Officer Country: USA	A greater emphasis on preventing the abuse of their technology through both technological and human processes. "The tech sector needs to do more on its own, the tech sector needs to do more with governments and NGOs, [and] we need to recognise that the law, regulation and governments have an increasing role to play in this space. Ultimately, we need to develop an industry-wide approach that will be principled, comprehensive and effective…The tech sector should consider creating a "major event" protocol, in which technology companies would work from a joint virtual command centre during a major incident.
Aktoudianakis (2019) *Open Society European Policy Institute*	Policymakers must affirm citizens' "right of access to data which has been collected concerning him or her, and the right to have it rectified", content on social media be "subject to control by an independent authority" that ensures its "compliance" with the relevant law, to protect free expression by combating propaganda and state-sponsored trolling.
Berners-Lee (2019) Director of the *World Wide Web Consortium* (W3C) Country: UK	Big internet platforms and social media companies must be regulated to prevent the worldwide web from being "weaponized at scale.
Newport (2019) associate professor of computer science at Georgetown University Country: USA	Freedom of expression is also affected by server ownership, the solution are new social media on independently owned servers. One of the systems is called POSSE, for "publish on your own site, syndicate elsewhere"- encourages competition and innovation while allowing users to vote with their feet. However, the author does not see this as a realistic alternative.
The Secretariat of the Internet and Jurisdiction Policy Network (2019)	Framework clarity, proportionality, procedural guarantees, accountability.
Svantesson (2019) Co-Director of the *Centre for Commercial Law* at the Faculty of Law	Ultimately, what we need are multi-stakeholder discussions involving governments, the tech industry, civil society and academia.

Author/Country	Policy Suggestions
Country: Australia	
Pennycook and **Rand** (in Dizikes, 2019) researchers Country: USA	The crowdsourcing approach – e.g. building audience judgments into an algorithm ranking stories by quality.
Collins (in Hern, 2019) politician Country: UK	Formalising FB relationship with its third-party fact checkers "in the long-term"
Porter (2019) attorney general (in Karp) Country: Australia	To create level playing field between social media platforms and traditional media.
King (in Boffney, 2019) *European Commission*	The platforms would need to open themselves to greater scrutiny to outside organisations if the EU was to stand by the voluntary code of conduct.
Coatney (2019) digital media consultant; former director of *Tumblr* Country: USA	We need a PBS for Social Media.
Cohen (in Lomas, 2019) actor Country: USA	Broadcast-style regulation that sets basic standards and practices of what content isn't acceptable for them to amplify to billions.
Some of the lawmakers at the Senate Judiciary subcommittee on anti-trust (in McColey, 2019) Country: USA	Some US Senators pressed top antitrust regulators to aggressively investigate the power of the country's biggest tech companies, with some lawmakers questioning whether the officials had the will or resources to take action.
Facebook Employees (October 2019)	Hundreds of *Facebook* employees have signed a letter to CEO Mark Zuckerberg and other executives saying they oppose the social network's policy of letting politicians lie in advertisements.
Benioff [32] CEO; Internet entrepreneur International	Social Media should be regulated as tobacco industry.
Mazzucato (2019) founder/director of the *Institute for Innovation and Public Purpose*; professor at University College London Country: UK	We need to develop a new governance structure, which starts with creating a new vocabulary. For example, calling platform companies "tech giants" implies they have invested in the technologies from which they are profiting, when it was really taxpayers who funded the key underlying technologies – from the Internet to GPS. We will need to rethink the governance of data, develop new institutions, and experiment with alternative forms of ownership.
Basu (2019) former Chief Economist of the	A successful strategy will have to look beyond antitrust laws. For the most influential platforms, governments may consider pushing a

[32] Found in: Focus (2019).

48

Author/Country	Policy Suggestions
World Bank; former Chief Economic Adviser to the Government of India; professor of Economics at Cornell University Country: India/USA	gradual shift to non-profit models, akin to public utilities.
McDonald (2019) digital anthropologist at *Leading Edge Forum* Country: UK	*Facebook* and others shouldn't ban political ads, they should be banning targeted advertising and take a firmer stance on misinformation and disinformation.
Zuboff (in Kavenna, 2019) Author; scholar Country: USA	Regulation. This is what the tech companies fear most.
Buttarelli (2019) EU's chief data protection regulator	To enforce transparency of dominant tech companies. To prohibit harmful practices, including profiling and behavioural targeting of children and young people and for political purposes," To build a "European digital commons" to support "open-source tools and interoperability between platforms, a right to one's own identity or identities, unlimited use of digital infrastructure in the EU, encrypted communications, and prohibition of behaviour tracking and censorship by dominant platforms". "Antitrust, democracies' tool for restraining excessive market power. EU's Data Protection Board
Pope (2019) Country: Vatican	Tech companies should prevent kids from viewing porn – self-regulation.
Amnesty International (2019)	It is "now evident that the era of self-regulation in the tech sector is coming to an end" — state-based regulation will be necessary.
Eisenreich (2019) Minister of Justice Country: Germany (Bavaria)	The platforms should be regulated at the same level as legacy media.
Tugend (2019) Country: USA	Government regulation, public pressure, worker action.
Weissmann (2019) Country: USA	Revisiting the federal Office of Technology Assessment Applying Yale Professor Jack Balkin´s "information fiduciary" model for social media companies
Van Alstyne (in Schmid, 2019) professor at Boston University; research associate at the *MIT Initiative on the Digital Economy* Country: USA	The ideal solution is really somewhere in between EU and USA approaches, continuing to have companies create value, but taking into consideration the European approach of fair allocation. Legislation needs to consider how value—for both consumers and companies—is being created (supply-side or demand-side).
Scalzi (in Newitz, 2019)	We should turn the whole system on its head with an intense emphasis on the value of curation by individual users – a more

49

Author/Country	Policy Suggestions
science fiction author Country: USA	robust, comprehensive version of privacy settings, where news and entertainment would reach you only after you opted into them. This could include a few cheap services with ads and more expensive without. Crowdfunding could create a public broadcasting version of video sharing. Apps and devices to help people curate the content.
Noble (in Newitz, 2019) professor at the University of California at Los Angeles Country: USA	Slow media – future public platforms set limits on how quickly content circulates. It is completely different business model.
Shane (in Newitz, 2019) algorithm designer; author Country: USA	We need humans to maintain and curate the digital public spaces we actually want.
Busse (2019) journalist Country: Germany	It is not to be expected that the platforms will self-regulate - there must be political intervention.
Hall (in Newitz, 2019) co-founder and Director of *Strategy at Mule* Country: USA	To create digital public spaces that imitate actual town halls.
Kendall (in Newitz, 2019) writer Country: USA	Returning to pratice known as meeting face-to-face. People who aren t willing to meet in person, simply won t be trusted. In virtual spaces, if avatares are claiming to be part of a group, but nobody in that group has met them, it would be an instant warning sign.
Pakistan Press Foundation (2020) Country: Pakistan	In reaction to rules regulating SM approved by the *Federal Cabinet* in secrecy without any practical discussion or consultation with the stakeholders, „The promotion of responsible content moderation is, in fact, the ultimate goal towards which any regulatory mechanism should strive for, however, the distinction must be drawn between regulating and controlling the social media platforms."
Brossi (2020) citizen Country: Chile	It is necessary to regulate, not to restrict freedom of expression, but on the contrary, so that governments and large digital corporations create equitable conditions for access and distribution of quality information, essential for any democratic society. An important debate that must take place in regulatory terms is about transparency and algorithmic responsibility.
Dans (2020) Professor of Innovation at IE Business School Country: Spain	Eliminate the incentive to trafficking data, give users the tools to report when they suspect wrongdoing, and force all those who have built economic empires around it to rethink their business based on more acceptable model.
Feierstein (2020), CEO of *Glacier Environmental Fund* Country: USA	Set up an independent panel of experts. Provide whistleblower protection and reward to any SM employee willing to provide evidence that leads to the conviction of management and other employee. Prohibiting all US federal government agencies from advertising on

Author/Country	Policy Suggestions
	SM.
Gauci (2020) managing partner at *GTG Advocates and Caledo*; lectures on legal futures and technology at the University of Malta Country: Malta	To impose measures on SM to be more transparent and fair with users, and to have more social responsibility, enforcing transparency and require SM companies to act fairly and make it easier for users to track the amount of time they spend on their platforms, to empower the user to self-exclude himself like in the gaming industry on the time users can spend on a platform across all devices, along with more programmes for digital literacy and awareness of the effects of excessive SM use from SM companies.
Aro (in Ciglerová, 2020) journalist Country: Finland	We can put pressure on SM.
Balkin (2020) Knight Professor of Constitutional Law and the First Amendment at Yale Law School. Country: USA	First, you must give incentives to SM to adopt professional and public-regarding norms. Second, you must make SM internalize some of the costs they impose on the world around them. The goal should be to increase the number of players. The goal should be to give SM companies incentives to professionalize and take responsibility for the health of the public sphere. (Antitrust and competition law, Privacy and consumer protection law, Balancing intermediary liability with intermediary immunity, public pressure and media coverage of social media companies can help).