



May 21, 2025

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Chair
Federal Trade Commission

Re: Notice of Inquiry and Request for Public Comments Regarding Technology Platform Censorship [Docket No. FTC-2025-0023]

The Center for Journalism & Liberty at Open Markets Institute submits this comment in response to the FTC Request for Information as part of its inquiry into how technology platforms may deny or degrade access to services based on the content of speech. Despite our objection¹ to the illegal and unconstitutional attempt to fire the Democratic Commissioners Rebecca Slaughter and Alvaro Bedoya, we feel that it is important that this politicized inquiry nonetheless include empirical evidence about the role that dominant tech platforms play in shaping, and at times manipulating, the flow of information on their platforms.

This submission is motivated by concern for the increasingly inaccurate narrative that content moderation disproportionately harms conservative speech at the expense of more neutral inquiry on corporate platforms' content moderation. Moreover, many of the most damaging content moderation outcomes – whether suppression, amplification, or or the like – are the result not of overt viewpoint discrimination, but of incentives created by problematic business models, opaque recommendation algorithms, advertiser preferences, and political and regulatory pressure from both Democratic and Republican administrations, including in respect to foreign policy objectives related to terrorism, violent extremism and foreign influence operations.

To this end, we provide evidence showing that content moderation by the three dominant platforms that have controlled dominant shares of the social media and search markets, Meta (encompassing Facebook and Instagram), X (formerly Twitter), and Google (including Search and YouTube) have censored journalistic content, both intentionally and as a byproduct of their platform policies. Journalism has long been recognized as a critical institution for democracy and freedom of the press is singled out for protection within the Bill of Rights. Therefore, we do not support any efforts by the FTC to intervene in the content of speech on these platforms, but rather to redress the

¹ [Statement from Open Markets: Donald Trump Attempts to Fire Democratic FTC Commissioners Bedoya and Slaughter](#)



power imbalances and market distortions that have enabled Big Tech corporations to become information gatekeepers and support efforts such as those in Ohio to regulate dominant digital platforms as common carriers to guarantee nondiscrimination and equal access.

Google and Meta have employed methods that unfairly compel journalists to rely on their platforms for distribution, monetization and access to audiences, hindering the emergence of alternative platforms. Google's dominance in search and ad tech has been found to be illegal and anti-competitive, underscoring its role as a critical, unavoidable pathway to reach audiences. Meta's acquisitions, particularly Instagram and WhatsApp, which are currently being prosecuted by the Federal Trade Commission, reduced competition in social media, which is a vital channel for news distribution because of the concentrated control over access to audiences. X, while different in its scale and primary function, has become a significant, real-time news source and a platform – with many utility-like aspects as we outlined in our November 2022 letter to the DOJ, FCC, and FTC² - where many publishers and journalists connect with audiences. Changes to its algorithms and policies can therefore disproportionately affect how journalists disseminate their work and connect with audiences. Algorithmic curation can significantly impact the reach, referral traffic and monetization for news organizations.

As dominant gatekeepers in social media and search, the operational and policy decisions of these platforms have immense consequences for the free flow of information, the public's fundamental right to receive and access information, and the viability and visibility of journalism. Furthermore, these platforms have been granted unprecedented exemption from liability under Section 230 while enjoying de facto First Amendment protections for their content moderation under the grossly anti-democratic theory that their speech rights outweigh the speech rights of their users, even though their primary role is to host the speech of others. This has enabled privatized censorship that would be unthinkable in other parts of our information communications system, such as telecommunications or the postal service.

Meta's platforms, Facebook and Instagram, which by some estimates account for as much as 70-80% of all social media web traffic, serve as critical spaces for community connections and news dissemination. However, a consistent stream of incidents reveals a pattern of content moderation approaches and decisions that have negatively

² [Open Markets Calls on US Agencies to Investigate Elon Musk's Ownership of Twitter and Starlink](#)

impacted journalists and journalistic content, often under opaque or inconsistently applied policies. Since its acquisition by Elon Musk, X has projected an image of "free speech absolutism." However, this rhetoric is frequently contradicted by actions that arbitrarily or vengefully censor journalists and news content. And Google's illegal monopoly over search and dominance in video sharing via YouTube (which is the world's second most popular search engine) makes it an essential gatekeeper and its algorithms key arbiters of news visibility. While Google asserts its commitment to providing relevant and authoritative information, its practices have repeatedly raised concerns about the de-ranking and suppression of journalistic content, particularly from independent or critical voices.

Our own research along with publicly available evidence indicates a troubling pattern of practices across these digital giants that results in the suppression, de-prioritization, and effective censorship of journalistic content, through explicit design, algorithmic opacity, or acquiescence to external pressures. CJL provides a range of illustrative examples below to ensure the public record includes ample research supporting the negative impact these dominant platforms' practices have on the free press.

- **Retaliatory discrimination and censorship of news publications:** Meta's threats and deliberate removal or severe restriction of news content in Canada³, Australia⁴, California⁵, and parts of Europe⁶, often in response to laws requiring payment to publishers, functions as a potent form of privatized censorship (and deterrent to other jurisdictions seeking similar fair compensation frameworks). This act of suppression, regardless of the company's stated economic or legal justifications, directly limits the ability of millions to discover, share, and engage with news, allowing a powerful private entity to dictate what information citizens can readily access. This creates information voids, potentially increases vulnerability to misinformation, and demonstrates a concerning exercise of platform power to silence and retaliate against news organizations. While Meta may frame these as business decisions, the undeniable outcome is a restriction on the free flow of information essential for a well-functioning society, making these actions a clear exercise in content control with censorship-like effects.

³ [Meta begins blocking news content in Canada over new publisher payment law | Euronews](#)

⁴ [Meta says it may block news from Facebook in Australia | Reuters](#)

⁵ [Meta again threatens to block news if bill forcing company to pay publishers becomes law](#)

⁶ [Meta to end Facebook news service in Europe's biggest markets | Financial Post](#)

Google has “tested” similar practices as well.⁷

- **Retaliatory Suspensions and Exodus of Journalists:** On X, a pattern of suspending journalists critical of Mr. Musk or his companies has emerged. In December 2022, approximately ten prominent journalists, including Keith Olbermann, Donie O'Sullivan (CNN), and reporters from The New York Times and The Washington Post, were suspended.⁸ Musk cited a newly created policy against sharing real-time private jet location data (which he equated with “doxxing”), a policy implemented arbitrarily implemented one day prior.⁹ Many affected journalists denied violating this rule, noting they reported on an already-suspended account (@ElonJet) or linked to publicly available flight data. Similar suspensions of critical journalists like Steven Monacelli (Texas Observer) and Ken Klippenstein (The Intercept) occurred in January 2024, with X initially offering only vague references to rule violations.¹⁰ Spectator journalist Jacqueline Sweet also had her account restricted and links to her article debunking rumors about Musk suppressed with “unsafe link” warnings, allegedly for “doxxing.”¹¹

Operational changes under Musk, including significant cuts to safety staff (an 80% reduction in safety engineers) and the reinstatement of previously banned accounts (some for hateful conduct), have led to a reported surge in hate speech and inauthentic activity.¹² This deteriorating environment has prompted numerous journalists and reputable news organizations, including NPR, The Guardian, Le Monde, and the European Federation of Journalists, to reduce their presence on or leave X entirely, citing the proliferation of hate, misinformation, and concerns over Musk's personal influence on political debate on the platform he owns.¹³

- **Direct Manipulation, Algorithmic Bias, Opacity and Selective Amplification:** During the 2024 US elections and their aftermath, Instagram concealed search results for hashtags related to Democrats while¹⁴, along with Facebook, amplifying posts from Donald Trump and J.D. Vance.¹⁵ X similarly manipulated

⁷ [Google tests blocking news content for some Canadians | Reuters](#)

⁸ [Twitter suspends journalists who have been covering Elon Musk and the company](#)

⁹ [Post by “Safety” on X](#)

¹⁰ [Gee, Guess What Twitter Just Did to Accounts Critical of Elon Musk? | The New Republic](#)

¹¹ [Journalist's X account reportedly restricted after debunking Elon Musk sock puppet rumors | The Independent](#)

¹² [Report reveals the extent of deep cuts to safety staff and gaps in Twitter/X's measures to tackle online hate | eSafety Commissioner](#)

¹³ [Why Journalists and Media Outlets Are Leaving X - Twitter - Newsreel Asia](#)

¹⁴ [Instagram hides search results for 'Democrats'](#)

¹⁵ [Why You Might Suddenly Be Following Trump on Instagram and Facebook - The New York Times](#)

visibility during the recent elections in Germany when its algorithms disproportionately amplified extremist parties.¹⁶ Research shows that claims of direct anti-conservative political bias in content moderation is likely attributable to a higher propensity for such accounts to post violative content, such as prohibited misinformation.¹⁷ The opaque algorithms used by all of these platforms to rank and recommend content are susceptible to biases that can disproportionately amplify certain narratives while suppressing others, as well as direct manipulation.

The impact of Google's core algorithm updates frequently lead to sudden, severe, and often inexplicable drops in search traffic for news publishers.¹⁸ Turkish lawmakers, for example, have accused Google of using opaque algorithms that decimated traffic to independent news sites by up to 98%, crippling their revenue.¹⁹ While Google maintains these updates aim to improve global search quality and are not targeted, the "black box" nature of these algorithms means legitimate publishers can be penalized without clear recourse, effectively censoring them by diminishing their reach and financial stability. Google's ranking formula, NEWS CORE, which combines historical site reputation (OLD SCORE) with source credibility (SOURCE RANK), inherently benefits established news brands, potentially disadvantaging smaller, newer, or independent news sources, even if their journalism is high quality.²⁰ Furthermore, the criteria for these scores and rankings are opaque, non-public and determined unilaterally by the corporation, as opposed to independent professional bodies for example.

- **Shadow Banning:** Shadow banning, or the covert reduction of content visibility without user notification, is a pervasive concern. Platforms often deny this practice or reframe it as "demotion" or "visibility filtering."²¹ For journalists, whose work depends on reach, shadow banning is a potent form of censorship, leading to unexplained drops in engagement and fostering self-censorship as they attempt to avoid unknown algorithmic triggers. Both Meta and X have been

¹⁶ [Political Biases on X before the 2025 German Federal Election](#)

¹⁷ [Scientists Respond to FTC Inquiry into Tech Censorship | TechPolicyPress](#)

¹⁸ [Publishers left guessing how Google's March 2025 core update will reshape search](#)

¹⁹ [Turkish lawmakers slam Google over declining traffic to independent news sites](#)

²⁰ [How Google news rankings affect news sites visibility](#)

²¹ [Shadowban/ Shadow-ban – Glossary of Platform Law and Policy Terms](#)

accused of arbitrarily or algorithmically shadow banning accounts, with journalists often caught in the crossfire.²²

- **Algorithmic Penalization and Blocking of External Links:** A fundamental feature of journalistic dissemination—sharing links to external articles—is actively penalized by X's algorithm. Elon Musk confirmed this policy, stating it aims to discourage "lazy linking" and keep users on the platform to increase ad revenue.²³ Research indicates this can reduce the visibility of tweets with external links by a factor of up to eight²⁴, directly and disproportionately impacting journalists' ability to drive traffic to their work and inform the public. X has also engaged in more targeted link suppression. In April 2023, it restricted sharing and engagement with Substack links shortly after Substack announced a Twitter-like feature, suggesting anti-competitive motives.²⁵ Links to other platforms like Mastodon and Instagram were also briefly banned in December 2022.²⁶ More recently, in February 2025, X began blocking links to Signal.me, a domain for the encrypted messaging app Signal (often used by journalists for secure communication), labeling them "potentially unsafe" without clear justification.²⁷
- **The "Newsworthiness" Paradox:** Meta's "newsworthiness" exception, which allows content that might otherwise violate its Community Standards to remain if deemed in the public interest, has been a source of controversy. While this policy was instrumental in reinstating iconic journalistic images like Nick Ut's "Napalm Girl" photograph (after initial, repeated removals due to child nudity policies²⁸), its application has been criticized as inconsistent and susceptible to a circular logic where virality—often algorithmically amplified by Facebook itself—can be taken as proof of newsworthiness.²⁹ This can disproportionately benefit powerful public figures whose pronouncements gain traction, while journalistic content that challenges power may not receive the same latitude. Between June 2023 and June 2024, Meta documented 32 newsworthy allowances, 14 of which were for

²² [Twitter Appears to Be Shadow Banning Accounts That Criticize Elon Musk ; Recognizing and responding to shadow bans – RJI](#)

²³ [Does the Twitter/X Algorithm Downrank Your Links? What Small Businesses Should Know](#)

²⁴ [Revealing The Secret Power: How Algorithms Can Influence Content Visibility on Social Media](#)

²⁵ [Twitter Restricts Linkage to Substack, Raising Questions About 'Free Speech' in the App | Social Media Today](#)

²⁶ [Twitter abruptly bans all links to Instagram, Mastodon, and other competitors | The Verge](#)

²⁷ [X Blocks Signal.me Links Citing Security Concerns](#)

²⁸ [How the Napalm Girl continues to define free speech | The Verge](#)

²⁹ ["Newsworthiness," Trump, and the Facebook Oversight Board - Columbia Journalism Review](#)

politicians.³⁰ X, under Musk, explicitly lowered its newsworthiness threshold in 2023, raising concerns about the spread of election-related misinformation by political figures.³¹

- **Government Influence and Platform Compliance:** Facebook, X, Google, and YouTube have demonstrably complied with authoritarian demands for censorship that specifically target journalists and their work, thereby becoming complicit in efforts to silence critical reporting and independent media. For instance, these platforms have restricted or removed accounts and content belonging to journalists in countries like Turkey³², India³³, and Vietnam³⁴ following government orders that often vaguely cite national security, public order, or defamation, but in reality, aim to suppress investigative pieces on corruption, human rights abuses, or dissenting political views. Reports from press freedom organizations and journalistic bodies have highlighted numerous cases, such as YouTube blocking access to hundreds of investigative videos by a Turkish journalist in a single day at the government's behest, or Facebook and X acceding to requests from the Indian government to block journalists' accounts and specific critical news content. This pattern of compliance, driven by the desire to maintain market access or avoid harsher penalties, means these global tech giants frequently act as enforcers of censorship against the press, directly undermining journalistic freedom and the public's right to access information unhindered by authoritarian control.

The United States' foreign policy priorities, particularly related to countering violent extremists and exerting influence abroad, can make influence platform content moderation policies and decisions.³⁵ When the U.S. government or its allies identify content or accounts as potentially harmful to national security interests or as foreign malign influence, they may flag them as violations of the platform's terms of service or pressure these platforms to remove or downrank such content, such as when government actors urged platforms to limit the spread of Russian propaganda in the wake of the country's invasion of Ukraine³⁶

³⁰ [Approach to Newsworthy Content | Transparency Center](#)

³¹ [A Guide to Social Media Moderation Policies for the Post-Election Period | TechPolicyPress](#)

³² [Joint Open Letter to Social Media Companies on Censorship in Türkiye](#)

³³ [Escalating Censorship in India Threatens Independent Journalism](#)

³⁴ [Viet Nam: Tech giants complicit in industrial-scale repression - Amnesty International](#)

³⁵ [14 On the Frontlines of the Information Wars: How Algorithmic Gatekeepers and National Security Impact Journalism: Tweaking a global source of news - Columbia Journalism Review](#)

³⁶ [Tech Firms Caught in the Middle of Russia's War on Ukraine | TechPolicyPress](#)



or efforts to counter violent extremist content.³⁷ While such content moderation may be intended to protect democratic processes, such actions can lead to the censorship of legitimate journalistic work, especially the difficulty of precisely and neutrally defining harmful, malign, extremist or terrorist. The reliance of journalists on these platforms exacerbates this, as the platforms may err on the side of caution to comply with governmental requests or more general political priorities, such as countering CVE or foreign influence operations, even if it means suppressing journalism. It may also lead journalists to further self-censor.

X has shown a significant willingness to comply with government demands to block journalistic accounts and content. In May 2025, X blocked over 8,000 accounts in India, including those of news outlets like The Wire, Free Press Kashmir, Maktoob Media, and journalists such as Anuradha Bhasin of Kashmir Times, amid India-Pakistan tensions.³⁸ X stated it was complying with Indian government orders under the IT Act, 2000, due to potential penalties, including imprisonment of local employees, while also conceding that blocking entire accounts "amounts to censorship".³⁹ A similar pattern exists in Turkey, where X has complied with numerous court orders to block accounts of news organizations and journalists like Erk Acarer and Hayko Bagdat, citing "national security" grounds. X reported an 85.66% compliance rate with Turkish government requests in the latter half of 2024.⁴⁰

The gravity of potential censorship is further underscored by whistleblower allegations. Former Meta employee Sarah Wynn-Williams testified before a Senate Judiciary Subcommittee that Meta worked "hand in glove" with the Chinese government, providing "custom built censorship tools" and removing a Chinese dissident living in the U.S., Guo Wengui, from Facebook in 2017 after pressure from Chinese officials.⁴¹ While Meta stated Guo's removal was for sharing personal information and called Wynn-Williams' broader testimony "divorced from reality," such allegations raise profound questions about the platform's commitment to free expression when faced with authoritarian demands.

³⁷ [GFICT: Possibly the Most Important Acronym You've Never Heard Of; 'Lost memories': War crimes evidence threatened by AI moderation | Reuters; https://svrianarchive.org/en/lost-found](https://www.reuters.com/technology/gfict-possibly-the-most-important-acronym-youve-never-heard-of-lost-memories-war-crimes-evidence-threatened-by-ai-moderation-2025-05-08/)

³⁸ [The Wire's website, 8,000 X accounts blocked in India amid conflict with Pakistan - Committee to Protect Journalists](https://www.thewire.in/2025/05/08/x-blocks-8000-accounts-in-india-amid-conflict-with-pakistan/)

³⁹ [Mass Gaggling: X Starts Blocking Over 8,000 Accounts in India On Govt Order](https://www.thewire.in/2025/05/08/x-blocks-8000-accounts-in-india-amid-conflict-with-pakistan/)

⁴⁰ [Joint Open Letter to Social Media Companies on Censorship in Türkiye](https://www.thewire.in/2025/05/08/x-blocks-8000-accounts-in-india-amid-conflict-with-pakistan/)

⁴¹ [Meta whistleblower tells senators Facebook worked "hand in glove" with Chinese government to censor posts - CBS News](https://www.cbsnews.com/news/meta-whistleblower-tells-senators-facebook-worked-hand-in-glove-with-chinese-government-to-censor-posts/)

- **Systemic Censorship of Palestinian Content and Journalists:** One of the most persistent and well-documented areas of concern involves the censorship of Palestinian voices. Human Rights Watch and other digital rights organizations have detailed systemic and retaliatory suppression, including the repeated disabling of journalist Ahmed Shihab-Eldin's Instagram account, which had nearly one million followers, and the permanent deletion of Quds News Network's Facebook page.⁴² Journalist Tamer Almisshal of Al Jazeera Arabic had his Facebook profile deleted just 24 hours after his program aired an investigation into Meta's censorship of Palestinian content.⁴³ Meta frequently attributes such actions to violations of its Dangerous Organizations and Individuals (DOI) policy, even when reporting is neutral and merely mentions US designated terrorist entities, or cites unspecified "security reasons". These justifications are often applied inconsistently, leading to accusations of systemic bias that silences Palestinian narratives and journalism covering the region, as well as reporting in Arabic more generally.⁴⁴ Allegations have also surfaced regarding meetings between Israeli government officials and Facebook executives aimed at limiting pro-Palestinian content, further blurring the lines between platform policy and state influence.⁴⁵

Such instances are not limited solely to content relating to Israel and Palestine, however. They also include the Ukrainian news site Liga.net being banned in 2017, initially for "nudity" and later for a "malicious ad rule," and journalist Matthew Caruana Galizia being locked out of his account for sharing Panama Papers documents.⁴⁶

- **Weaponizing Notice-and-Takedown Systems:** Globally influential US policies aimed at protecting intellectual property rights have been weaponized by government and business officials as a tool to censor independent news media online and deter investigative reporting. Malign actors, including state-affiliated media, governments, officials, content farms, and PR firms, have been able to leverage copyright regimes to censor critical content through the technical infrastructure created by platforms to implement their obligations under the Digital Millennium Copyright Act. Specifically, platforms' automated notice and

⁴² [Meta's Broken Promises: Systemic Censorship of Palestine Content on Instagram and Facebook](#)

⁴³ [Facebook removes Al Jazeera presenter's profile after he releases expose](#)

⁴⁴ [URGENT: Understanding and Responding to Global Emerging News Threats](#)

⁴⁵ [Facebook accused of anti-Palestinian bias by digital rights group and Palestinian news agencies | Sada Social](#)

⁴⁶ [Seven Times Journalists Were Censored: 2017 in Review | Electronic Frontier Foundation](#)

takedown (NTD) systems, designed to address copyright and privacy claims, are exploited by reputation management firms and others to send massive numbers of fraudulent notices, leading to automated filtering, blocking, or removal of targeted content by platforms, including journalistic work, leading to critical journalistic coverage being erased from the internet and news archives.⁴⁷

- **Manipulation of Search Visibility via Advertising:** Google's advertising systems can be exploited to suppress critical journalism. The case of journalist Carey Gillam and Monsanto is illustrative. Internal Monsanto documents revealed plans to pay Google to promote search results critical of Gillam's book, "Whitewash," and her reporting on glyphosate.⁴⁸ This involved paying for specific posts to appear for searches like "Monsanto glyphosate Carey Gillam" to counter her findings.⁴⁹ Although Google may not have had any direct involvement beyond standard ad sales, it underscores how Google's platform can be weaponized to marginalize critical reporting.
- **The "Walled Garden" Effect and Publisher Marginalization:** Google's broader practices, such as the effective forced adoption of Accelerated Mobile Pages (AMP) to maintain mobile search visibility, and the increasing tendency for Google Search to provide direct answers (through features like Google Discover and Google News Showcase) exert control over the visibility of news and function as de facto content moderation.⁵⁰ These practices reduce direct referral traffic to publishers' own websites, diminishing their monetization capabilities and direct audience relationships, constituting an economic form of content suppression.

Conclusion

The evidence strongly suggests that Meta (Facebook, Instagram), X, and Google (YouTube) engage in practices that result in privatized corporate censorship of journalistic content and speech through a combination of direct actions, opaque

⁴⁷ [Weaponizing Privacy and Copyright Law for Censorship by Courtney Radsch](#)

⁴⁸ [Monsanto's campaign against U.S. Right to Know: read the documents](#)

⁴⁹ [Monsanto's Unethical Tactics in Combating Weedkiller Cancer Controversy](#)

⁵⁰ [How Google Abuses Its Position as a Market Dominant Platform to Strong-Arm News Publishers and Hurt Journalism Updated ; Letter to the U.S. Department of Justice Antitrust Division on the Google search monopoly case](#)



algorithmic processes, and compliance with external pressures. These actions are not isolated incidents but rather indicative of systemic issues within the digital information system that these platforms dominate.

The consequences for press freedom and media sustainability are severe. Arbitrary, capricious and politicized content moderation erodes public trust, fosters self-censorship among journalists, limits the diversity of available information, and undermines the economic foundations of news organizations in the US and around the world. The practices are disproportionately harmful to independent or critical journalistic voices that are essential for a healthy democracy. Efforts to redress technologically embedded forms of information control wielded by private entities that have become the de facto arbiters of the public sphere should focus on the structural and regulatory approaches that permit these platforms to act as both host and speaker.

The power wielded by these platforms suggests that structural reforms and alternative regulatory approaches rooted in the United States' traditional approaches to regulating communications and transportation platforms are needed. They must ensure transparency, accountability, and a commitment to upholding the principles of free expression that are vital to an informed citizenry and a robust democracy. Such policies may include must-carry policies for news, the prevention of self-preferencing by the platforms, further crackdowns on anti-competitive mergers and acquisitions, algorithmic transparency requirements, and the mandating of neutral applications of terms of service. The current trajectory, if left unaddressed, risks further diminishing the role of independent journalism and consolidating control over information in the hands of a few dominant digital gatekeepers.