June 11, 2018

Mark Zuckerberg Chairman and CEO Facebook, Inc. 1 Hacker Way Menlo Park, CA 94025

Re: Alternative Solution for Politics Tagging

Dear Mr. Zuckerberg:

We write on behalf of a broad collection of news publishers from around the world. We represent organizations who have existed for nearly two centuries and digital-natives who launched in the last handful of years; publishers with subscription models, publishers with advertising models, publishers with licensing and distribution models; local news institutions covering small regions and cities, and news organizations that cover nations and the world.

We are concerned with Facebook's inclusion of news content in its new policies to label all political and issue-based advertising, and to create a searchable archive for all such content. It is from our view of highest importance that the framework, which is currently being developed by Facebook, recognizes and values high-quality journalism separately and apart from political or issue-based advocacy found across the platform.

Below, we share comments and three broad recommendations on your ad archive and a process to exempt news content from the ad archive. They reflect the ideals and shared point of view of the news industry – founded on cherished principles of press freedom enshrined in the First Amendment – an industry on which you rely to provide content that drives "time well spent" on your platform.

Placing news ads in an archive designed to capture political advertising implies that Facebook considers there is a political agenda behind journalism. This is not a marketing or business issue. We see your policy as another step toward furthering a false and dangerous narrative that blurs the lines between real reporting from the professional media and propaganda. Marketing our products, or subscriptions to our products, is *not* separate from our journalism or from press freedom. Our marketing *must reflect* our journalism and tell the

story of what it takes to produce credible, source-reported, quality news. We cannot and will not engage in any process that conflates legitimate newsgathering with politics or advocacy.

We believe it is in the interest of both Facebook and news organizations, particularly during this season of primaries leading up to federal elections in the United States, to ensure that you apply a clear exemption for publishers of professional journalism so that:

- (1) all marketing by news organizations remains outside any archive until full solutions are put into place.
- (2) all of our advertising is treated as general advertising and is not placed into the political category by the mere fact that it mentions politics or issues.
- (3) the global news industry plays a leadership role in developing and contributing to the maintenance of a news exemption observed by Facebook.

It is Facebook's responsibility to retrofit its original policy and exclude from their political advertising archive those who produce news and cover political events around the world. This responsibility resides with Facebook alone. At the same time, Facebook's observance of the exemption, without industry input, would likely deepen rifts between Facebook and the news industry, lead to undesirable outcomes for our readers and users of Facebook and cause greater harm to the availability of quality news on the platform.

While we recognize that there are many dozens of news organizations with various models and priorities, it is our job – in fact, our expertise – to make critical judgments across a complicated array of facts and ideas, which is what distinguishes our professional media from political advertising and other information provided by political or advocacy groups.

We are confident that we can help lead Facebook to a reasonable, scalable solution working through a coalition of associations, who happen to already spend their time thinking about these issues.

Proposed criteria for identifying qualified news organizations:

It is important that several criteria are taken into consideration when determining a publisher eligible to be exempted. Those could include news organizations that (i) have a dedicated professional editorial staff that create and disseminate original news and related content

concerning local, national, or international matters of public interest on at least a weekly basis, and (ii) is commercially marketed through subscriptions, advertising, or sponsorship, or is a democratically accountable, properly constituted not-for-profit. The criteria for getting exempted could also include looking at audience size, and membership in accepted industry associations that represent a broad spectrum of publishers. A process could also be formed to enable publishers that are not members of any of the listed organizations to be exempted from the ad archive.

- o <u>NMA</u>
- o <u>DCN</u>
- o <u>ASNE</u>
- o <u>SPI</u>
- o <u>WAN-IFRA</u>
- o INMA
- o ONA
- o MPA
- o <u>EPC</u>

We suggest that there are highly credible organizations that support reporters in countries emanating from repressive regimes or where there are no publishers' organizations, who would be good partners for Facebook in identifying and exempting credible news organizations. These include, but are certainly not limited to: International Center for Journalists (www.icfj.org), Committee to Protect Journalists (cpj.org/), the Knight Center for Journalism in the Americas (knightcenter.utexas.edu), and Reporters Sans Frontieres (rsf.org/en). A partnership with Facebook on this issue could support these organizations' efforts both substantively and financially.

Most fundamentally, Facebook is making a serious mistake in pursuing strategies that are (i) automated and do not involve partner organizations, and (ii) attempt to make article-by-article content distinctions without looking at the credibility and professionalism of the source of that content. Such strategies will necessarily lead Facebook to censoring high-quality journalism, and furthering anti-journalism narratives around the world.

Given your new policy has already gone into effect and that news advertising is currently subject to your new rules, we would appreciate your prompt attention to our concerns. Please reach out to any of the undersigned associations, who will then help coordinate a meeting with all of us.

Sincerely,

Alfredo Carbajal

President

American Society of News Editors

Jason Kint

CEO

Digital Content Next

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Angela Mills Wade

Executive Director

European Publishers Council

Linda Thomas Brooks

President and CEO

MPA – The Association of Magazine Media

Sinda Shomus Brooks

David Chavern

President and CEO

News Media Alliance

Alison Bethel McKenzie

Executive Director

Society of Professional Journalists

Michael Golden

President

WAN IFRA

World Association of Newspapers and

News Publishers