



17 April 2018

Australian Competition and Consumer Commission
175 Pitt Street
Sydney NSW 2000

By email: platforminquiry@accc.gov.au

Dear Commission,

Thank you for the opportunity to make this submission and participate in the Australian Competition and Consumer Commission (ACCC) Digital Platforms Inquiry to address important issues raised in the terms of reference.¹

The Terms of Reference for the Inquiry identify matters to be taken into consideration in the course of the Inquiry, which include but are not limited to:

1. the extent to which platform service providers are exercising market power in commercial arrangements with the creators of journalistic content and advertisers;
2. the impact of platform service providers on the level of choice and quality of news and journalistic content to consumers;
3. the impact of platform service providers on media and advertising markets;
4. the impact of longer-term trends, including innovation and technological change, on competition in media and advertising markets; and
5. the impact of information asymmetry between platform service providers, advertisers and consumers and the effect on competition in media and advertising markets.

Our written submission stands together with an industry submission from the Digital Industry Group Inc. (DIGI). We have previously expressed our views on information quality issues in similar contexts elsewhere internationally and on our corporate blogs that are in the public domain.² To complement these statements, we have structured this submission as follows:

- First, we provide an overview of Twitter, our core values, and the value we strive to bring to the world;
- Second, we summarise progress made to improve the quality of information on Twitter, our commitment to transparency, and recent improvements made to our platform; and
- Lastly, we share some of the ways stakeholders can work together to address these complex issues.

¹ Australian Competition and Consumer Commission (ACCC), *Digital Platforms Inquiry Issues Paper*, viewed on 16 April 2018

<https://www.accc.gov.au/system/files/DPI%20-%20Issues%20Paper%20-%20Vers%20for%20Release%20-%202018%20-%2028006%29.pdf>

² Twitter (14 June 2017). Our Approach to Bots & Misinformation [Blog post]. Retrieved from

https://blog.twitter.com/official/en_us/topics/company/2017/Our-Approach-Bots-Misinformation.html;

https://blog.twitter.com/official/en_us/topics/company/2017/Update-Russian-Interference-in-2016--Election-Bots-and-Misinformation.html; Twitter (19 January 2018). Update on Twitter's Review of the 2016 U.S. Election [Blog post]. Retrieved from

https://blog.twitter.com/official/en_us/topics/company/2018/2016-election-update.html



Twitter supports policy frameworks that encourage innovative uses of our platform as a distribution channel for media partners to reach new audiences, and to give everyone the power to create and share information and ideas, instantly, without barriers.

Overview of Twitter and our Values

As a public, real-time platform, Twitter is where people can see every side of a topic, discover news, share their perspectives, and engage in conversation. Twitter was founded upon a set of core values that continue to guide us as we develop as a company. Among those values are defending and respecting the user's voice and a two-part commitment to freedom of expression and privacy.

Twitter's purpose is to keep the world informed by serving the public conversation and supporting a free and independent media as a matter of public interest. We celebrate journalism and believe strongly in the importance of a rich media ecosystem where consumers have variety, quality, and choice in news.

Journalism and Media Partnerships on Twitter

Australian publishers and broadcasters ensure that high-quality news and information is available to all Australians. News publishers and journalists are essential to Twitter, and we strive to be a dependable, valuable partner. Their success is our priority.

Globally, thousands of journalists have a Twitter account, and most consider the platform an essential tool of the trade. Playing to Twitter's strengths as a public, conversational, and real-time platform, many Australian journalists use Twitter every day to track local and global breaking news or trending stories, engage in research, identify sources or subject matter experts, and gauge public sentiment on certain topics.

In addition to the important role that Twitter plays in keeping Australian journalists informed about what's happening in the world, Twitter helps media partners achieve their digital goals. Through these partnerships, Twitter is increasing audience engagement and reach for media outlets by sending clicks to publishers and unlocking new sources of revenue for partners.³ Twitter is now working with more than 250 major content publishers worldwide, including Bloomberg Media Group, Channel Seven Network, and Viacom, to provide live premium content in the fields of news, sports, and entertainment.

Australia is an important market for our news partnership programs, and we are proud to have launched some of our most significant innovations here. Through partnerships with Australian news organisations, Twitter has helped promote major events like the Federal Budget,

³ Kantrowitz, A. BuzzFeed (31 January 2018). Twitter Is Sending More Clicks To Publishers As Facebook Sends Fewer, New Data Show. Retrieved from https://www.buzzfeed.com/alexkantrowitz/twitter-is-sending-more-clicks-to-publishers-as-facebook?utm_term=.ti88Z4pzX#.ktVGpVW0y



Melbourne Cup, and Mardi Gras via live broadcasts while also helping to monetise this content by aligning media publishers with advertisers.

Twitter In-Stream Video (previously Twitter Amplify) is designed to let publishers monetise their video content on Twitter while making it easier for advertisers to reach massive audiences. This product allows brands to run In-Stream Video Ads aligned with videos and highlight clips from partners, including top TV networks, major sports leagues, publishing houses and magazines, and professional news outlets.⁴ Launched in Australia in 2013 in partnership with Channel Ten and Southern Cross Austereo, this product saw Twitter and the content partner split the revenue generated from advertising on the platform.

As described by Lucinda Southern in DigiDay on 28 February 2018:

“Twitter’s payouts to publishers as part of its Amplify program have grown 60 percent since last year, according to the platform...Amplify launched five years ago as a way to help publishers make money from selling pre-roll ads around their Twitter content... However, having a variety of ways for publishers to monetize their content on Twitter, like sponsorships and Periscope Super Hearts, is a bonus.”⁵

Of note, Channel Seven has used our In-Stream Video Ads solutions during the Summer and Winter Olympics, Australian Open, My Kitchen Rules, and the AFL; all of which allowed Seven to extend their audience reach and maximise engagement with its premium programs and event-based content. Building on Seven’s existing use of Twitter as a key distribution platform, Twitter helped enable Seven to deliver and monetise exclusive Tweet video highlights and content from the Australian Open through @7Tennis with 11 advertising partners to sponsor the content.⁶ As part of Channel Seven’s Australian Open coverage, Seven West Media’s Digital Officer Clive Dickens stated:

“At Seven we believe that T.V. now stands for Total Video and Twitter is an essential platform of our 7everywhere product and strategy. Consumers can experience our exclusive live sports content on their device and platform of choice and our Partners and Sponsors messages follow our Premium content everywhere.”⁷

This advertising model continues to drive engagement and revenue for media outlets by distributing and monetising content on Twitter. These partnerships present multiple new

⁴ Twitter (18 April 2017). How In-Stream Video Ads on Twitter help marketers tell their story [Blog post]. Retrieved from https://blog.twitter.com/marketing/en_us/topics/best-practices/2017/how-in-stream-video-ads-on-twitter-help-marketers-tell-their-story.html

⁵ Southern, L. Digiday (28 February 2018). ‘A big resurgence’: Publishers get a boost from Twitter video. Retrieved from <https://digiday.com/media/big-resurgence-publishers-get-boost-twitter-video/>

⁶ Twitter (13 January 2017). @SevenWestMedia to increase #AusOpen video reach & revenue with @Twitter [Blog post]. Retrieved from https://blog.twitter.com/official/en_au/topics/company/2017/sevenwestmedia-to-increase-ausopen-video-reach-and-revenue-with-twitter.html

⁷ *Ibid.*



opportunities for the media to reach passionate audiences by creating premium content and earning revenue by engaging brands to sponsor this content on Twitter.⁸

Partnerships with Journalism NGOs

Twitter has a history of facilitating civic engagement and political freedom, and we intend for Twitter to remain a vital avenue for free expression here and abroad.

Twitter also works closely with an array of organizations devoted to protecting and enhancing those rights and capabilities. Among our marquee partners are the Committee to Protect Journalists, Reporters Without Borders, Article XIX, the Walkley Foundation and many other organisations. Through initiatives like World Press Freedom Day, Twitter participated in and hosted events to celebrate journalism and the importance of a free press.

We've conducted outreach, provided trainings, and lent support to many journalistic organisations. Locally, we have partnered with the Walkley Foundation in the past for Storyology, the organisation's annual festival of journalism and media, as well as hosted the winner of the Walkley Foundation Young Journalist of the Year Award in our Sydney, New York City, and Washington D.C. offices. Twitter is also currently partnering with the Foundation to provide best practice trainings to keep local journalists up to date on our product and policy changes so they can utilise Twitter as a tool for critical and informative journalism.

Additionally, at Twitter we see an incredibly vibrant and diverse conversation on our service every day, and we strive to reflect this inclusion through our company initiatives. Among the many women's empowerment initiatives we lead and support at Twitter, we partnered with Women in Media to work with female journalists and provide training on how to utilise Twitter in a journalistic context.⁹

Choice and Information Quality

Twitter is committed to keeping people informed about what's happening in the world. As such we care deeply about the issues of misinformation as well as disinformation, and their potentially harmful effects on the civic and political discourse that is core to our mission.

Over the past two years, we have significantly increased our efforts to bolster our existing systems and detection capabilities, and implement additional safeguards against manipulation of our platform to spread mis- and disinformation. The scholar Claire Wardle of First Draft, a non-profit focused on media literacy and improving information quality online, has proposed a typology for misinformation (inadvertent sharing of false information) and disinformation

⁸ Twitter (1 November 2017). New premium video content coming to Twitter in Australia [Blog post]. Retrieved from (https://blog.twitter.com/official/en_au/topics/company/2017/NewpremiumvideocontentcomingtoTwitterinAustralia.html)

⁹ @WiM_Aus (4 August 2015) #womeninmedia #canberra Practical @TwitterAU workshop w @FlipPrior @PressClubAust AUG25 1230-130 @withMEAA discounts [Tweet]. Retrieved from (https://twitter.com/WiM_Aus/status/628694421718982656); @WiM_Aus (4 August 2015) #Canberra #womeninmedia if using @TwitterAU goes with the job, this is a MUST! Limited places <http://meaa.io/CBRTWT> Women in Media added [Tweet]. Retrieved from (https://twitter.com/WiM_Aus/status/628819834495635456)



(deliberate creation and sharing of false information).¹⁰ Quality, peer-reviewed research like this illustrates the need for society to better understand the new information quality challenges we are all confronting and the different responses required.

We also see that Twitter's open and real-time nature is a powerful antidote to the spreading of all types of false information. No single company, government or non-government actor should be the arbiter of truth. Instead, we see journalists, experts, and engaged citizens Tweeting side-by-side to affirm, correct, and challenge public discourse in seconds. Twitter is also a place for journalists to find eyewitness accounts of events and verify them - even when they are not on the ground.

Supporting the Information Ecosystem

While enforcing the Twitter Rules and addressing malicious automation and attempts to 'game' the Twitter service to propagate disinformation is a response, it isn't the only long-term solution. The long-term solution must also include the active involvement of governments, civil society, and non-government organisations (NGOs) in addressing media literacy as well. The information ecosystem of the future will also depend upon informed and media-savvy consumers, and we must prepare the next generation to thrive in such an environment.

Globally, our partners Common Sense Media, the National Association for Media Literacy, the Family Online Safety Institute, and Connect Safely, amongst others, have helped us to craft materials and conduct workshops to help our users learn how to process online information and discern between sources of news. We focus on elements like verification of sources, critical thinking, active citizenship online, and the breaking down of digital divides.

Twitter partners with journalistic NGOs for training and media literacy initiatives, including Reporters Without Borders, the Committee to Protect Journalists, and the Reporters Committee for Freedom of the Press. Through these partnerships, we will continue to work with reporters and media organisations to ensure that Twitter's real-time capacity for dispelling untruths is built into the approach of newsrooms and established media outlets.

We also recognise that government organisations can be important sources of credible and authoritative information, especially in times of crises and emergency. Twitter's open and real-time features become critical tools for governments, journalists, our users, and nonprofits to share and exchange essential information and real-time updates that can save lives. We frequently conduct local training and outreach initiatives, for example with the Australian Federal Police, the New South Wales Rural Fire Service, or Lifeline Australia. Through this outreach, we help ensure organisations can utilise Twitter effectively, add value to the information needs of local communities, and promote continuous progress in civic engagement and democratic accountability.

¹⁰ Wardle, C. (17 February 2017). Fake news, it's complicated [Blog post]. Retrieved from <https://medium.com/1st-draft/fake-news-its-complicated-d0f773766c79>



Data and Consumer Privacy

Privacy is built into Twitter's DNA. It's something we take a serious and active role in promoting and advocating for across the world; it's important that we offer the best and most transparent privacy and data controls to our users. Unlike many other services, Twitter is public by nature. When you Tweet, you're making a public statement - your Tweet is viewable and searchable by anyone. We also provide people on Twitter a suite of industry-leading tools that gives them the most transparent access to their information and granular control over how it's used.¹¹

Twitter's data products are built on content that people choose to share publicly. For example, data from Direct Messages or private accounts is not sold. Twitter provides several different levels of data access via our application programming interfaces (APIs).¹² The broadest access for enterprise customers involves a rigorous onboarding process including detailed assessment of the prospective customer, how they propose to use the data, and who the end users of the data will be.

All data customers, at any level, are required to comply with the terms of Twitter's Developer Agreement and Policy¹³ and Automation Rules,¹⁴ including the Twitter Terms of Service.¹⁵ Additionally, our Developer Terms provide more detail about restricted uses of Twitter's APIs.¹⁶ Twitter has a robust risk-based enforcement program that uses a wide range of indicators to ensure data customers are complying with our rules, policies, and restrictions. This includes automated monitoring, proactive review and detection, and developer or other third party tips.

In October 2017, Twitter announced plans to launch a new industry-leading platform called the Ads Transparency Center (ATC).¹⁷ The ATC goes beyond the requirements of the Honest Ads Act, which Twitter has publicly endorsed and will provide increased transparency to all advertisements on Twitter.¹⁸ The ATC will offer everyone visibility into who is advertising on Twitter, details behind those ads, and tools to share feedback with us. The transparency centre will launch in the United States in time for the mid-term 2018 elections with the aim of rolling out globally in the future.

¹¹ Twitter (17 May 2017) Building new data controls and updating our privacy policy. Retrieved from https://blog.twitter.com/official/en_us/topics/product/2017/Building-new-data-controls-and-updating-our-privacy-policy.html

¹² "Twitter Developer Policy." Twitter. <https://developer.twitter.com/en/docs/tweets/search/overview>. Web (16 April 2018).

¹³ "Twitter Developer Agreement and Policy." Twitter. <https://developer.twitter.com/en/developer-terms/agreement-and-policy>. Web (16 April 2018).

¹⁴ "Twitter Automation Rules." Twitter. <https://help.twitter.com/en/rules-and-policies/twitter-automation>. Web (16 April 2018).

¹⁵ "Twitter Terms of Service." Twitter. <https://twitter.com/en/tos>. Web (16 April 2018).

¹⁶ "Twitter Developer Terms." Twitter. <https://developer.twitter.com/en/developer-terms/more-on-restricted-use-cases>. Web (16 April 2017).

¹⁷ Twitter (24 October 2017) Building new data controls and updating our privacy policy. Retrieved from https://blog.twitter.com/official/en_us/topics/product/2017/New-Transparency-For-Ads-on-Twitter.html

¹⁸ @Policy (10 April 2018) Twitter is pleased to support the Honest Ads Act. Back in the fall we indicated we supported proposals to increase transparency in political ads [Tweet]. Retrieved from <https://twitter.com/Policy/status/983734917015199744>



Algorithms and the Timeline

At Twitter, we give users control over how they engage with content on our service. For example, you can decide whether you want to see content that's based on your individual experience of the platform or in reverse chronological order.

Furthermore, as part of our Health initiative, we're exploring new ways to measure the civility of public discourse on our platform.¹⁹ As part of this initiative, our Information Quality team is working on new ways for us to surface the material that comes from authentic sources, particularly during real-time news events where Twitter is front and centre of providing the world with the lens through which to see what's happening.

We are also currently involved in a Request for Proposals process through which we invited researchers to come and guide this initiative.²⁰ This will involve access to our APIs under strict codes of practice and ethical guidelines. This is building on our existing work of allowing experts, academics, and thought-leaders to access our data products and public APIs to push research on society in the digital age further. We are proud of this industry-leading openness and look forward to continued partnership with institutions that can augment and enhance our mission, and improve Twitter for everyone.

Conclusion

We trust this written submission together with the industry submission by DIGI will be useful inputs to the Committee's work. Twitter is committed to working with the ACCC, the Australian Government, our industry partners, and other stakeholders to ensure that we have a better understanding of the issues at stake and can find the best way to approach this together. Working with the broader community, we will continue to test, to learn, to share, and to improve, so that our platform remains effective and safe for everyone.

Yours sincerely,

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¹⁹ Twitter (1 March 2018) Twitter Health Metrics Proposal Submission [Blog post]. Retrieved from https://blog.twitter.com/official/en_us/topics/company/2018/twitter-health-metrics-proposal-submission.html

²⁰ *Ibid.*