



Mariya Gabriel, Commissioner for Digital Economy & Society
European Commission
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Belgium

CC:

Roberto Viola, Director-General, Communications Networks, Content and Technology
Giuseppe Abbamonte, Director, Media Policy, Directorate I
Paolo Cesarini, Head of Unit, Media Convergence and Social Media

January 31, 2019

Dear Commissioner Gabriel,

We write in regard to the [Code of Practice on Disinformation](#) and to express our concern about the lack of publicly available data about political advertising towards EU residents, particularly on the Facebook platform. We urge the Commission to raise these concerns with Facebook and specifically to encourage public availability of its [Ad Archive API](#).

Mozilla is working to launch a Firefox Election package for the EU Parliament Elections and is exploring options for add-ons, tools, and information that would be most useful to include. However, we have determined that we will be unable to deliver the transparency we hoped to EU residents. This is due to challenges we have encountered with our [Ad Analysis for Facebook](#) add-on, which we had planned to promote ahead of the elections.

The Ad Analysis for Facebook add-on has two key features. First, the add-on analyzes the user's Facebook feed in order to identify what ads the user is seeing and identify how the user is being targeted. This information is collected on the user's device over time. The information is then shown to users in a way that helps them understand who, in aggregate, is trying to influence them politically and what information is being used to target political ads.¹ Second, the information is also compared to publicly available data sources, in order to show how the ads users are seeing might differ from the ads seen by friends, neighbors, and other citizens.

These two pieces of functionality are critical to bringing greater transparency to political advertising and to advertising in general. However, recent changes to the Facebook platform have prevented third

¹ Of note, information analyzed by our add-on does not leave the user's device and therefore does not create additional privacy risks.

parties from conducting analysis of the ads users are seeing.² This limits our ability to deliver the first piece of functionality identified above. We have included an excerpt of these changes in the appendix below.

In addition, there is currently a lack of publicly available data about political advertising on Facebook in the European Union that can be compared to information about what ads users are seeing. We therefore cannot deliver the second key piece of functionality described above. This is in part because Facebook has yet to fulfill its commitments under the *Political advertising and issue-based advertising* section of the Code to enable public disclosure of political advertising.

Facebook in August [announced](#) the roll out of its Ad Archive API, to make “advertising more transparent to help prevent abuse on Facebook, especially during elections.” This API could notionally provide the data needed. As of today, *that API remains private and is available to only a small number of privileged researchers.*

Facebook Vice President Nicholas Clegg also announced on 28 January that the company will be releasing a new political ad transparency tool in March, prior to the elections. However, Clegg’s language and the subsequent [public announcement](#) from Facebook suggest this tool will be similar to the [Ad Archive](#) website that was made available last year in the United States.³ This site allows for simple keyword searches. We do not believe that the site meets the commitments in the Code.⁴ It has design limits that prevent more sophisticated research and trend analysis on the political ads.

Transparency cannot just be on the terms with which the world’s largest, most powerful tech companies are most comfortable. To have true transparency in this space, the Ad Archive API needs to be publicly available to everyone.⁵ That is what is needed to fulfill the spirit of commitments in the Code of Practice. Moreover, to be relevant to the upcoming EU Parliamentary elections, that API must be available soon, with enough lead time to allow developers to innovate and build transparency tools with the data the API provides. Public availability of this API is all the more pressing now that other public transparency tools that were previously available have stopped working.

We have spoken to Facebook directly about these concerns and continue to look for opportunities in the future to partner on solutions to these challenging issues. We also appreciate the considerable work that Facebook and others have done to fight disinformation on their platforms. Nonetheless, we have thus far been unable to identify a path towards meaningful public disclosure of the data needed. While strengthening our electoral processes for the digital age is a multipronged effort, transparency must be

² For further information, please see <https://www.propublica.org/article/facebook-blocks-ad-transparency-tools>

³ The announcement links to the same Ad Archive and appears to describe the same limited functionality: “The library is completely searchable and can be accessed by anyone in the world regardless of whether they have a Facebook account or not at facebook.com/adlibrary.” See <https://newsroom.fb.com/news/2019/01/european-parliament-elections/>

⁴ To be valuable, any tool must be usable for discovery and analysis, rather than simple keyword-based retrieval.

⁵ Google has made its political advertising data set publicly available, in a format that conforms with database standards, allowing for discovery, research and analysis. The functionality provides a useful model for what the Commission should expect of other companies in this space. Further information and the data set can be found at: <https://console.cloud.google.com/marketplace/details/bigquery-public-data/google-political-ads>

the cornerstones of that effort. We urge Facebook to develop an open, functional API that can be used by any developer, researcher, or organisation to develop tools, critical insights, and research designed to educate and empower users to understand and therefore resist targeted disinformation campaigns.

Mozilla strongly supports the Commission's work to fight disinformation and the leadership you have shown with the Code of Practice. We would encourage you to raise these concerns with Facebook directly.

Sincerely,

Denelle Dixon

Chief Operations Officer

Mozilla Corporation

Appendix

The highlighted code below suggests that when Facebook detects programmatic efforts to simulate a click event, it blocks that action and generates a report using a tool named AdsTransparencyTypedLogger with the content AdsTransparencyEvent = ACTIONS_BLOCKED. The title and the content of the report appears to suggest that the code specifically targets efforts related to "Ad Transparency."

```
blockScriptClicks: function(a, c) {
  __p && __p();
  var d = !1;
  b("EventListener").capture(a, "click", function(a) {
    if (a.isTrusted === !1) {
      a.preventDefault();
      a.stopPropagation();
      if (d)
        return;
      new
(b("AdsTransparencyTypedLogger"))().setAdID(c).setEvent(b("AdsTransparencyEvent").ACTION_BLOCK
ED).setProduct(b("AdsTransparencyProduct").FEED_UNIT_CHEVRON_BUTTON).log();
      d = !0
    }
  })
}
```