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Ursula von der Leyen
President
European Commission
Rue de la Loi / Wetstraat 200
1049 Brussels
Belgium

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CC:

Margrethe Vestager, Executive Vice President, Europe fit for a Digital Age
Thierry Breton, Commissioner, Internal Market

Dear President von der Leyen,

These are unprecedented times - the ongoing COVID-19 epidemic and its broader ramifications pose major challenges for our people and our societies. Technology is playing a critical role in our collective response, and the present crisis has underscored why it is so important that technology and the internet work for the individual and the common good.

Yet, we cannot lose sight of the fact that the internet today is not what it should be. Your recent Digital Strategy recognised that, and we have a once-in-a-generation opportunity to put in place bold solutions that are worthy of the challenges at hand. Rather than mitigating the symptoms of an unhealthy internet, we need radical ambition and creative solutions to rise to the opportunity presented by your new Digital Strategy.

At Mozilla, as a mission-driven company and a not-for-profit foundation, along with a global community of technologists, creators, and thinkers, we offer a glimpse of what an alternative future for the internet could be. We hope that the EC's Digital Strategy will ultimately spark and encourage future diversity in online experiences from small, independent and innovative organizations like Mozilla. We play our part in this shared effort by building independent software and consumer products that respect privacy, security, and autonomy of individuals around the world and appreciate your commitment to these critical fundamental rights for consumers.

A better internet requires collective action, and the commitment to a new Digital Services Act signals that the European Commission recognises the opportunity for leadership. I write to you today to provide thoughts and support in this endeavor.

We would like to see the EU's Digital Services Act focus on several key initial goals towards building a better internet:

- **Meaningful transparency** - Despite the laudable efforts of the European Commission and other entities in recent years, disinformation remains a blight on online experiences. To address it, we first need real insight into how it is spreading through online systems, and the extent to which platform architectures and commercial incentives may be fueling it. The DSA can set the standard in this regard as an initial matter by ensuring platforms are transparent about what advertising is on their platform and how that advertising is being served to individuals. We encourage the Commission to consider whether broad advertising disclosure protocols, which apply beyond just political ads, would give the public greater insight into potential harm happening on closed platforms.
- **Content accountability** - For too many individuals and groups, the internet today is not an empowering outlet for free expression. It will never be, unless we can address the way in which some business practices amplify illegal and harmful content. Any regulation needs to encourage comprehensive content responsibility, meaning companies are accountable for ensuring their practices and processes do not give undue amplification to harmful and illegal content. There is always a risk that new regulation can stifle the creative innovation that has been sparked by the regulatory regimes in place to date. We believe the key to mitigating this risk is careful engagement of expert voices on where the lines can be drawn to encourage responsibility and accountability in thoughtful ways, and we appreciate your commitment to this diversity of voices and perspectives.
- **A healthier online ecosystem** - Advertising is the predominant business model of the internet today, and it has contributed to the development of a range of quality products and services that many of us rely on - and funds directly or indirectly a wealth of innovative businesses, including our own. Yet the ecosystem underpinning these models and practices is unwell. Aggressive collection of personal data and microtargeting of individuals is at the heart of many of the systemic problems facing the internet. The DSA can take meaningful steps to address this, for instance by ensuring the advertising economy is not a vector for individual and collective harm; by clamping down on nefarious cross-site tracking; or by bringing more transparency to the ad tech ecosystem. I strongly encourage you to make it a key objective.
- **Contestable digital markets** - Intermediary platforms in the digital ecosystem bring important consumer and commercial benefits in the European markets, but also hold tremendous power. Many small, medium, and independent companies, including Mozilla, are vulnerable to 'upstream' actions at the platform level that can have an impact on 'downstream' innovation and consumer choice. I welcome the Commission's efforts to gather insight into these issues and its exploration of potential solutions to ensure that Europeans reap the benefits of contestable digital markets.



The kind of change required to realise these recommendations is not only possible, but proven. Mozilla, like many of our innovative small and medium independent peers, is steeped in a history of challenging the status quo and embracing openness, whether it is through pioneering security standards, or developing industry-leading privacy tools. We appreciate the European Commission's willingness to challenge the status quo in service of a better internet.

With the DSA, the European Commission has a once-in-a-generation opportunity to address the systemic challenges holding back the internet from what it should be. We're working to play our part in addressing those challenges, and we look forward to working alongside the Commission in its own efforts.

Yours sincerely,
Mitchell Baker
CEO, Mozilla Corporation