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January 28, 2019

Mr. Jeff S. Jordan
Federal Election Commission
Office of Complaints Examination and Legal Administration
Attention: Kathryn Ross, Paralegal
1050 First Street, NW
Washington, D.C. 20463

Re: Matter Under Review 7550 (Twitter, Inc.)

Dear Mr. Jordan:

On November 29, 2018, the Federal Election Commission (“FEC” or “Commission”) notified our firm of a complaint filed against Twitter, Inc. (“Twitter”) by Joshua Alan Abel, an individual user of Twitter’s platform.

The complaint’s central allegation is that Twitter violated the Federal Election Campaign Act of 1971, as amended (“FECA”), by suspending Mr. Abel, thereby denying him access to his Twitter account to post content supporting Democratic congressional candidates.¹ Far from intending to influence any election, Twitter had flagged Mr. Abel’s account – which had been exhibiting spam-like behavior – for action as part of a politically neutral and wholly automated effort to remove spam and other content that impedes effective use of the platform. As the complaint itself reflects, Twitter eventually suspended Mr. Abel’s account when he failed common, well-established re-verification procedures used at Twitter and throughout the industry when an account is flagged for questionable behavior. This type of automated re-verification process occurs *nearly ten million times a week* at Twitter.

Both the FECA and Commission precedent confirm that activities undertaken by a business for non-political reasons – such as the re-verification process at issue here – are not “for the purpose of influencing an election” and, therefore, do not qualify as regulated contributions or expenditures under the law. Accordingly, and as further detailed on the following pages,

¹ A prior version of Mr. Abel’s complaint also appeared to claim a violation of 18 U.S.C. §§ 241 and 242. But these are criminal statutes outside the FEC’s jurisdiction. *See, e.g., CREW v. FEC*, 316 F. Supp. 3d 349, 361 n.6 (D.D.C. 2018) (explaining that the “FEC has no jurisdiction over . . . criminal allegations”); 11 C.F.R. §§ 111.4(d), 111.5 (requiring the FEC to reject complaints that fail to “describe a violation of a statute or regulation over which the Commission has jurisdiction”).

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Twitter respectfully requests that the Commission find no reason to believe that Twitter violated the FECA and dismiss this matter.

FACTUAL BACKGROUND

I. Background on Twitter

Twitter was incorporated in Delaware in April 2007.² While its principal offices are in San Francisco, California, the company has over 3,000 full-time employees and 35 offices worldwide.³ Twitter is a free service that allows users to publicly communicate in messages of up to 280 characters – regardless of the substantive content of the communication.⁴ Twitter has 335 million active users and ranks as one of the largest social networks in the world.⁵

Twitter “stands for freedom of expression”⁶ and the principle that “every voice has the power to impact the world.”⁷ Twitter has been called a “powerful tool for democracy”⁸ and “has bolstered grassroots conversations, disrupted the top-down nature of political leadership and thought, and has given voice to groups long hidden on the political periphery.”⁹ Among many other civic efforts, Twitter also partners with entities like The Pew Charitable Trust to promote voter registration and to help voters identify their polling locations.¹⁰

At Twitter, “abuse, malicious automation, and manipulation” are company-wide concerns¹¹ because “[i]nauthentic accounts, spam, and malicious automation disrupt everyone’s

² Twitter, *2018 Annual Report*, at <http://www.viewproxy.com/Twitter/2018/AnnualReport2017.pdf>.

³ See *id.*; Twitter, *Our Company*, at https://about.twitter.com/en_us/company.html.

⁴ Twitter, *Twitter Via SMS FAQs*, at <https://help.twitter.com/en/using-twitter/twitter-sms-faqs>; Selena Larson, *Welcome to a World with 280-Character Tweets*, CNN.com (Nov. 7, 2017), at <https://money.cnn.com/2017/11/07/technology/twitter-280-character-limit/>.

⁵ See *Twitter: Transparency and Accountability*, 115th Cong. (Sept. 5, 2018), Testimony of Jack Dorsey, Twitter Chief Executive Officer, before the U.S. House Comm. on Energy and Commerce at 3, at <https://docs.house.gov/meetings/IF/IF00/20180905/108642/HHRG-115-IF00-Wstate-DorseyJ-20180905.pdf> (“Dorsey Testimony”).

⁶ Bridget Coyne, *Empowering Freedom of Expression for National Voter Registration Day* (Sept. 27, 2017), at https://blog.twitter.com/official/en_us/topics/events/2017/national-voter-reg-day-2017.html.

⁷ Twitter, *Our Values*, at https://about.twitter.com/en_us/values.html.

⁸ Doug Gross, *5 Ways Twitter Changed How We Communicate*, CNN (Mar. 21, 2011), at <http://www.cnn.com/2011/TECH/social.media/03/21/twitter.birthday.communication/index.html>.

⁹ Van Newkirk, *The American Idea in 140 Characters*, *The Atlantic* (Mar. 24, 2016), at <https://www.theatlantic.com/politics/archive/2016/03/twitter-politics-last-decade/475131/>.

¹⁰ See Bridget Coyne, *Staying Connected to #ElectionDay with Twitter* (Nov. 7, 2017), at https://blog.twitter.com/official/en_us/topics/events/2017/electionday2017.html; Bridget Coyne, *Empowering Freedom of Expression for National Voter Registration Day*.

¹¹ Dorsey Testimony at 1.

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experience” on the platform.¹² As a result, Twitter is continuously working to address these issues in order to improve the health of the conversations on its platform.¹³

To that end, Twitter has issued public guidelines to its users to “clarify what is and isn’t allowed on the website.”¹⁴ These materials explain that “Twitter prohibits any attempt to use automation for the purposes of posting or disseminating spam, [that] such behavior may result in enforcement action,” and posting “duplicative or substantially similar content, replies, or mentions over multiple accounts you control, or creating duplicate or substantially similar accounts, with or without the use of automation, is never allowed.”¹⁵ Twitter’s Rules further inform users that any “accounts engaging in the following activities may be temporarily locked or subject to permanent suspension”:

Spam: You may not use Twitter’s services for the purpose of spamming anyone. Spam is generally defined on Twitter as bulk or aggressive activity that attempts to manipulate or disrupt Twitter or the experience of users on Twitter to drive traffic or attention to unrelated accounts, products, services, or initiatives. Some of the factors that we take into account when determining what conduct is considered to be spamming include:

- if you have followed and/or unfollowed a large number of . . . accounts in a short time period, particularly by automated means (aggressive following or follower churn);
- if your Tweets or Direct Messages consist mainly of links shared without commentary; . . .
- *if you post duplicative or substantially similar content, replies, or mentions over multiple accounts or multiple duplicate updates on one account, or create duplicate or substantially similar accounts; and*

¹² Yoel Roth and Del Harvey, *How Twitter Is Fighting Spam and Malicious Automation* (June 26, 2018), at https://blog.twitter.com/official/en_us/topics/company/2018/how-twitter-is-fighting-spam-and-malicious-automation.html; see also <https://twitter.com/jack/status/969234279321419776> (explaining that “harassment, troll armies, manipulation through bots and human-coordination, misinformation campaigns, and increasingly divisive echo chambers” that are receiving particular attention at Twitter).

¹³ See Del Harvey, *Serving Healthy Conversation* (May 15, 2018), at https://blog.twitter.com/official/en_us/topics/product/2018/Serving_Healthy_Conversation.html; Raghav Jeyaraman, *Fighting Spam with Botmaker* (Aug. 20, 2014), at https://blog.twitter.com/engineering/en_us/a/2014/fighting-spam-with-botmaker.html.

¹⁴ Mariella Moon, *Twitter’s New Rules Prohibit Bulk Tweeting to Fight Spam*, Engadget.com (Feb. 21, 2018), at <https://www.engadget.com/2018/02/21/twitters-rules-prohibit-bulk-tweeting/>.

¹⁵ Yoel Roth, *Automation and the Use of Multiple Accounts* (Feb. 21, 2018), at https://blog.twitter.com/developer/en_us/topics/tips/2018/automation-and-the-use-of-multiple-accounts.html.

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- if you post multiple updates to a trending or popular topic with an intent to subvert or manipulate the topic to drive traffic or attention to unrelated accounts, products, services, or initiatives.¹⁶

Twitter also has begun employing “technology to be more aggressive in detecting and minimizing the visibility of certain types of abusive and manipulative behaviors.”¹⁷ Twitter placed significant emphasis “on proactively identifying problematic accounts and behavior rather than waiting until [it] receive[d] a report” alleging abuse of the platform.¹⁸ Where Twitter’s algorithms determine that an account might be controlled by an automated bot, rather than a human, or that an account may be engaging in “spammy” behavior, the account is put “into a read-only state (where the account can’t engage with others or Tweet) . . . until it passes a challenge, like confirming a phone number” through a text message authentication process.¹⁹ This authentication process occurs more than 9.9 million times a week at Twitter²⁰ and similar efforts are employed by other companies like Amazon, Apple, Google, Facebook, and Instagram to protect users of their platforms from abuse.²¹ Implementing these enhanced processes has more than doubled the number of accounts Twitter is disciplining for spam policy violations, which has led to a precipitous drop in user complaints.²²

While the above information underscores the importance of these processes to Twitter’s business, one final point warrants emphasis: Twitter’s efforts to identify and reduce spam and automated accounts were not and are not motivated by a desire to influence an election. In sworn testimony before Congress, Twitter CEO Jack Dorsey confirmed that Twitter does not “consider political viewpoints, perspectives, or party affiliation in any of our policies or enforcement decisions, period.”²³ Indeed, as Mr. Dorsey noted, the very “purpose of Twitter is to serve the public conversation, and [the company] does not make value judgments based on

¹⁶ Twitter, *The Twitter Rules*, <https://help.twitter.com/en/rules-and-policies/twitter-rules> (emphasis added). See also Twitter, *Twitter Terms of Service*, <https://twitter.com/en/tos> (explaining, inter alia, that Twitter users may not interfere with other users by engaging in spamming).

¹⁷ Dorsey Testimony at 3. Indeed, “[i]ndependent researchers and some investors long have criticized the company for not acting more aggressively to address what many considered a rampant problem with bots, trolls and other accounts used to amplify disinformation.” Craig Timberg and Elizabeth Dwoskin, *Twitter Is Sweeping Out Fake Accounts Like Never Before, Putting User Growth at Risk*, Wash. Post (July 6, 2018).

¹⁸ Yoel Roth and Del Harvey, *How Twitter Is Fighting Spam and Malicious Automation* (further explaining that Twitter has developed “machine learning tools that identify and take action on networks of spammy or automated accounts automatically[, letting the company] tackle attempts to manipulate conversations on Twitter at scale, across languages and time zones, without relying on reactive reports”).

¹⁹ *Id.*

²⁰ See *id.*

²¹ Matt Elliot, *Why You Are at Risk If You Use SMS for Two-Step Verification*, CNet.com (July 23, 2017), at <https://www.cnet.com/how-to/why-you-are-at-risk-if-you-use-sms-for-two-step-verification/>.

²² Yoel Roth and Del Harvey, *How Twitter Is Fighting Spam and Malicious Automation*.

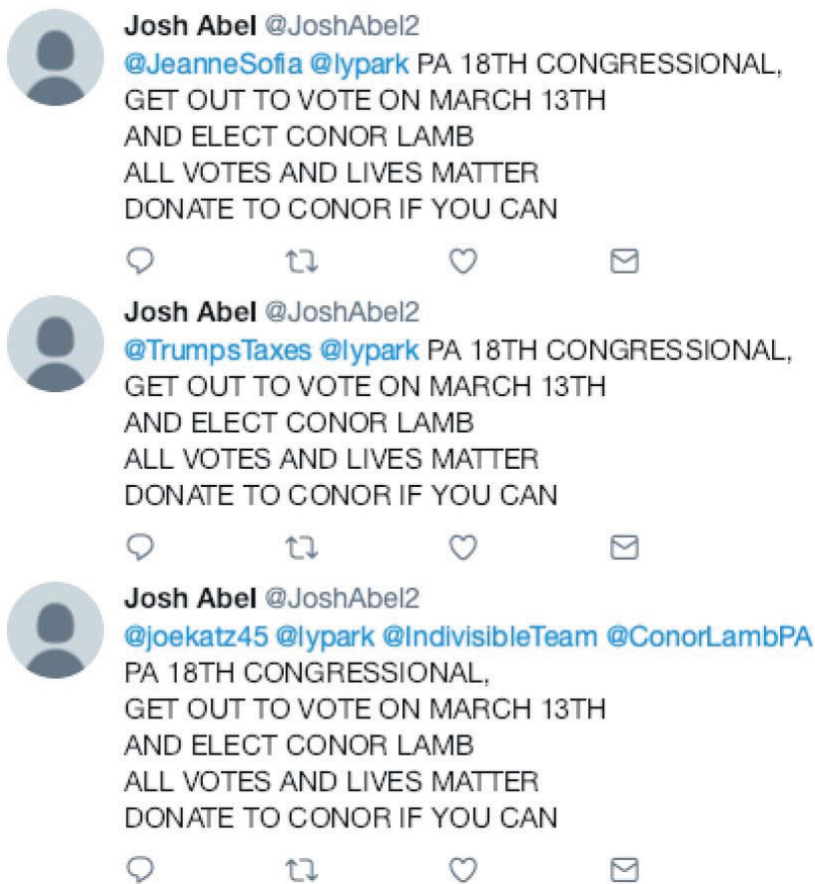
²³ *Twitter: Transparency and Accountability*, 115th Cong. (Sept. 5, 2018), Transcript of Proceedings before the U.S. House Comm. on Energy and Commerce, lines 238-241, at <https://docs.house.gov/meetings/IF/IF00/20180905/108642/HHRG-115-IF00-Transcript-20180905.pdf>.

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personal beliefs.”²⁴ In fact, “from a simple business perspective and to serve the public conversation, Twitter is incentivized to keep all voices on the platform.”²⁵ These principles carry over to the automated anti-spam measures applied to Mr. Abel’s account here, which apply platform-wide regardless of political viewpoint.

II. Background on the @JoshAbel2 Twitter Account

In February 2018, Twitter’s automated processes detected that content originating from the @JoshAbel2 account bore the hallmarks of a bot that was disseminating spam. In early March, the @JoshAbel2 account was again flagged by Twitter’s automated processes and placed into a read-only mode because of numerous duplicative and “spammy” Tweets posted on the same day, a selection of which are reproduced below.²⁶

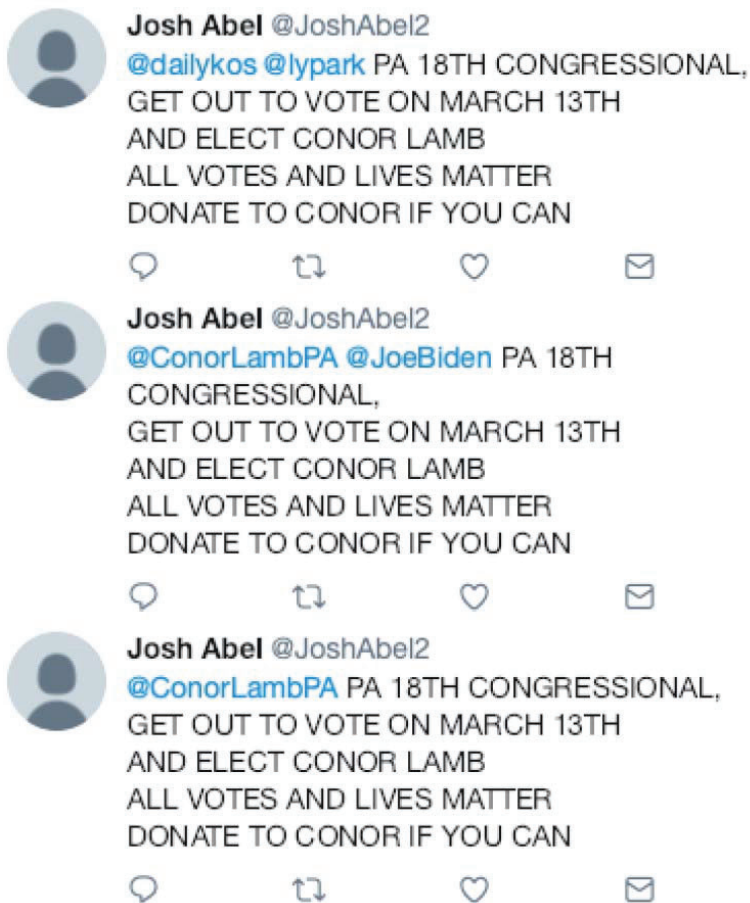


²⁴ Dorsey Testimony at 11.

²⁵ *Id.* at 1.

²⁶ In the interest of conserving space, Twitter is displaying only six exemplar Tweets; Mr. Abel in fact posted over thirty duplicative Tweets that day and has numerous similar instances in his account history.

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As the complaint in this matter reflects, Twitter asked the owner of @JoshAbel2 to authenticate the account using the mobile number associated with the Twitter account, and gave him two weeks to do so. Mr. Abel failed to authenticate the account, which he attributes to his use of a new phone number that he had yet associated with the account: “Twitter wanted to send me a code to my phone on their record, but that was an old number.” Twitter then suspended the @JoshAbel2 account. All actions associated with the re-verification and suspension were automated and without regard to the political nature of any content. Mr. Abel filed this FEC complaint approximately nine months later.

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THE LAW

As a general matter, corporations are prohibited from making a “contribution” in connection with a federal election.²⁷ The term “contribution” is defined as, among other things, “anything of value made by any person for the purpose of influencing any election for Federal office.”²⁸

Corporations may make independent expenditures, a term that includes “anything of value[] made by any person for the purpose of influencing any election for Federal office.”²⁹ Corporate independent expenditures are subject to certain reporting requirements.³⁰ Federal law further “provides that an expenditure made by any person ‘in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate, his authorized political committees or their agents’ constitutes an in-kind contribution,” rather than an independent expenditure, and may not be made by a corporation.³¹

The terms “contribution” and “expenditure” both contain a media exemption that excludes “news story, commentary, [and] editorial” content from regulation.³²

DISCUSSION

The complaint alleges that, “by suspending [Mr. Abel’s] account,” Twitter “benefited Rick Saccone and other candidates running against Beto O’Rourke [*sic*] and Randy Bryce,” two Democratic candidates running for office in 2018. The complaint does not explain how this “benefit” amounted to a FECA violation. Mr. Abel is presumably alleging that Twitter made a prohibited in-kind contribution to, or a reportable independent expenditure for, the non-Democratic candidates in the identified races.

The reality, however, is that no prohibited contribution or expenditure was made. Even setting aside the baseless notion that suspending a private citizen’s Twitter account is somehow a contribution to any and all causes and candidates that person opposes, Mr. Abel’s complaint fails for multiple independent reasons. The legal predicate for both contributions and expenditures is that they must be “for the purpose of influencing an election.”³³ As the courts and the Commission have made clear, activities undertaken for non-political reasons are not “for the purpose of influencing an election” and, therefore, do not qualify as regulated contributions or

²⁷ 52 U.S.C. § 30118.

²⁸ *Id.* § 30101(8)(A).

²⁹ *Id.* § 30101(9)(A).

³⁰ See 11 C.F.R. § 109.10 *et seq.*

³¹ First General Counsel’s Report, Matters Under Review 7199, 7219, 7242 (Patrick Murphy), Nov. 2, 2017.

³² See *id.* § 30101(9)(B); 11 C.F.R. § 100.73.

³³ See, e.g., 52 U.S.C. § 30101(8)(A), (9)(A); *Buckley v. Valeo*, 424 U.S. 1, 80 (1976) (explaining that “the FECA regulates activity that is ‘unambiguously related to the campaign of a particular federal candidate’”).

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expenditures.³⁴ In fact, Commissioners and FEC staff have previously recognized – without question – Twitter’s authority to control content and access to its platform by observing how “Twitter controls the terms by which users may access the website,” that the company “maintains the right to restrict content on its website,”³⁵ and that “Twitter maintains ownership interests in software . . . and retains the right to ‘remove or refuse to distribute any content on its services, suspend or terminate users, and reclaim usernames.’”³⁶

Here, Twitter’s anti-spam rules and enforcement mechanisms affect all accounts – Republican, Democratic, and non-partisan alike – when any of them are flagged for spam by Twitter’s automated systems. The particular rules that applied here related to duplicative posts and had nothing to do with the underlying substance of Mr. Abel’s Tweets. This process is part of Twitter’s ongoing effort to improve the overall quality of the discourse on its platform and, therefore, is not an effort to influence an election. Mr. Abel has not alleged any contrary facts or motivations, and no plausible story exists that includes those necessary elements. Thus, as a matter of fact and law, Twitter’s actions did not constitute a regulated contribution or expenditure.³⁷

Twitter’s efforts to remove spam and bot-like content from its platform also qualify for the FECA’s press exemption. Grounded in First Amendment principles, this exemption excludes from regulation “any cost incurred in covering or carrying” news stories³⁸ as well as decisions

³⁴ See, e.g., *Orloski v. FEC*, 795 F.2d 156, 160 (D.C. Cir. 1986); FEC Adv. Op. 2012-31 (AT&T) (finding no in-kind contribution where business’s activity “reflects commercial considerations and does not reflect considerations outside of a business relationship”); FEC Adv. Op. 2012-22 (skimmerhat) (concluding that no contribution would result where company provided Internet services “on a commercial basis only” and where the company “has a vested commercial interest in seeking participation of users from all political parties and ideological backgrounds”); Factual & Legal Analysis in Matter Under Review 7163 (Citizens for Joe Miller) (“explaining that a thing of value given to a campaign is not a ‘contribution’ if it was not for the purpose of influencing an election”); Factual and Legal Analysis in MUR 6586 (World Wrestling Entertainment, Inc.) (finding no contribution where corporation’s intent was to protect its business reputation).

³⁵ Matter Under Review 6911 (Lois Frankel for Congress), Statement of Reasons of Chairman Matthew S. Petersen and Comm’rs Lee E. Goodman and Caroline C. Hunter (Apr. 12, 2016).

³⁶ FEC Adv. Op. 2017-05 (Great America PAC) (internal brackets omitted). Likewise, in the enforcement context, the Commission’s Office of General Counsel has noted without disapproval that Twitter “maintains the right to restrict content on [its] website.” First General Counsel’s Report, MUR 6911 (Lois Frankel for Congress et al.), at 4 & n.14 (Sept. 3, 2015) (citing Twitter’s Terms of Service). Similarly, OGC has referenced Twitter’s reservation of its “right at all times . . . to remove or refuse to distribute any Content on the Services[and] to suspend or terminate users.”

³⁷ Furthermore, because Twitter’s services are offered for free, and the definitions of contribution and expenditure are predicated on providing something of value, a denial of free services to Mr. Abel cannot result in Twitter making a regulated contribution or expenditure subject to sanction under federal campaign finance law. Cf. Matter Under Review 6911 (Lois Frankel for Congress), Statement of Reasons of Chairman Matthew S. Petersen and Comm’rs Lee E. Goodman and Caroline C. Hunter (Apr. 12, 2016) (noting that “Twitter is a free service that does not charge users to create accounts, display profiles, or send [T]weets”); see also First General Counsel’s Report, MUR 6911 (Lois Frankel for Congress et al.), at 3 (Sept. 3, 2015) (noting same).

³⁸ 11 C.F.R. § 100.73.

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about what content to feature, address, or cover.³⁹ The Commission has made clear that this exemption applies to Internet Web sites and entities that distribute their content exclusively on the Internet,⁴⁰ as well as websites that curate news content.⁴¹ Given Twitter's news-oriented nature,⁴² there is little question that it qualifies as a media entity under the FECA and that Twitter's activities to curate the content posted on its site are exempt from regulation.

Moreover, to the extent that the complaint claims Twitter has made a prohibited corporate in-kind contribution to Rick Saccone and other unspecified candidates, Twitter's suspension of Mr. Abel's account must have been "in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate, [an opposing candidate's] authorized political committee[] or [its] agents."⁴³ The decision to suspend the account here, however, was not undertaken at the suggestion of, after substantial discussions with, or with the material involvement of any candidate, but as a result of internal automated processes.⁴⁴ The complaint does not allege (nor could it) that any such conduct occurred. In the absence of such conduct, there can be no in-kind contribution.

These and the other arguments advanced in Twitter's response to Matters Under Review 7443 and 7447 – including those grounded in the First Amendment and in the Communications Decency Act ("CDA"),⁴⁵ all of which are incorporated here by reference – preclude a finding of a violation by Twitter. The CDA, in particular, immunizes Twitter from liability for performing "a publisher's traditional editorial functions."⁴⁶ Not only does this include, for example, engaging in "any activity that can be boiled down to deciding whether to

³⁹ Statement of Reasons of Commissioners Darryl R. Wold, Danny L. McDonald, David M. Mason, Karl J. Sandstrom, and Scott E. Thomas, Matters Under Review 4929, 5006, 5090, and 5117 (ABC, CBS, NBC, New York Times, Los Angeles Times, and Washington Post et al.) (Dec. 20, 2000).

⁴⁰ FEC Adv. Op. 2008-14 (Melothe); *see also id.* (explaining that the Commission "has also recognized the Internet as a unique and evolving mode of mass communication and political speech that is distinct from other media in a manner that warrants a restrained regulatory approach").

⁴¹ FEC Adv. Op. 2016-01; *see also* FEC Adv. Op. 2005-16 (Fired Up) (finding that a website qualified as a media entity where it was "viewable by the general public and akin to a periodical or news program distributed to the general public").

⁴² *See, e.g.,* Alex Kantrowitz, *Twitter Is Experimenting with a Way to Show You Even More Breaking News Tweets*, BuzzFeedNews (Mar. 15, 2018), at <https://www.buzzfeednews.com/article/alexkantrowitz/twitter-is-experimenting-with-a-way-to-show-you-even-more#.yqa44w9LKW>; Alex Eule, *Twitter's Plan For Growth: Layoffs*, Barrons.com (Oct. 27, 2016), at <https://www.barrons.com/articles/twitters-plan-for-growth-layoffs-1477584370> (explaining that "much of the most relevant election news breaking [in 2016 is] on the [Twitter] service").

⁴³ *See supra* at 7.

⁴⁴ *See* 11 C.F.R. 109.21(d).

⁴⁵ 47 U.S.C. § 230(c).

⁴⁶ *Barrett v. Rosenthal*, 40 Cal. 4th 33, 43 (2006).

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exclude material that third parties seek to post online,”⁴⁷ but it also covers “reviewing, editing, and deciding whether to publish or to withdraw from publication third-party content.”⁴⁸

Accordingly, the complaint should be dismissed.

CONCLUSION

Twitter is committed to maintaining a robust platform for all citizens – be they liberal, conservative, or somewhere in between – to engage and debate public issues, including those involving political candidates and policies. At the same time, and to increase the quality of conversations it hosts, thereby enhancing its reputation as a place where individuals can debate ideas without getting overwhelmed by a flood of automated content, Twitter continually works to improve the experience for its users in a non-partisan way.

In another recent enforcement matter involving the regulation of Twitter content, commissioners warned against sweeping Twitter “into a cumbersome and often speech-prohibitive” scheme of regulation that would “hamper free communication through the thousands of new and developing social media platforms.”⁴⁹ Rather than stifle non-partisan technological innovation at Twitter and similar companies, the Commission should act consistent with these previously articulated principles, find no reason to believe that a violation of the FECA occurred, and dismiss this matter. The complaint here describes a garden variety customer service complaint, not a campaign finance violation.

⁴⁷ *Fair Hous. Council v. Roommates.com, LLC*, 521 F.3d 1157, 1170-1171 (9th Cir. 2008) (en banc).

⁴⁸ *Barnes v. Yahoo!, Inc.*, 570 F. 3d 1096, 1102 (9th Cir. 2009) (noting that “it is immaterial whether this decision comes in the form of deciding what to publish in the first place or what to remove among the published material”); *Joseph v. Amazon.com, Inc.*, 46 F. Supp. 3d 1095, 1106 (W.D. Wash. 2014) (“Whether the website operator removes certain reviews, publishes others, or alters content, it is still entitled to CDA immunity, since those activities constitute a publisher’s traditional editorial functions”); *Doe v. MySpace, Inc.*, 528 F.3d 413, 420 (5th Cir. 2008) (“Decisions relating to the monitoring, screening, and deletion of content [are] actions quintessentially related to a publisher’s role”); *Batzel v. Smith*, 333 F.3d 1018, 1031 (9th Cir. 2003) (“Publisher liability necessarily precludes liability for exercising the usual prerogative of publishers to choose among proffered material”); *Bennett v. Google, LLC*, 882 F. 3d 1163, 1167-68 (D.C. Cir. 2018) (“[The] decision to print or retract is fundamentally a publishing decision for which the CDA provides explicit immunity” and that a decision about “output control” is “the very essence of publishing”).

⁴⁹ Matter Under Review 6911 (Lois Frankel for Congress), Statement of Reasons of Chairman Matthew S. Petersen and Comm’rs Lee E. Goodman and Caroline C. Hunter (Apr. 12, 2016).

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Sincerely,

A handwritten signature in black ink, appearing to read "Caleb P. Burns". The signature is fluid and cursive, with the first name "Caleb" and last name "Burns" clearly legible, and a middle initial "P." in between. The signature is written on a light gray background.

Caleb P. Burns
Andrew G. Woodson