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social divisions within our country through sophisticated disinformation campaigns.

Much of this spread of intentionally false information relies on ~~lots~~ fake accounts. Indeed, a recent analysis of ~~100~~ million tweets discussing COVID-19 showed that nearly half of the tweets behaved like bots. Many amplified false narratives about the public health emergency.

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Congress ~~has~~ requested that the Federal Trade Commission submit a report on how the agency's authority to prohibit deceptive acts and practices ~~can~~ be used to address harmful bot activity, and the agency has provided a helpful summary of some of its past ~~work~~ ~~write~~ separately to outline why social media platforms cannot be trusted to police this problem. ~~I also~~ detail my own views on the scope of the FTC's deception authority with respect to problems posed by bots and fake accounts.

### **We Cannot Trust Tech Platforms to Police This Problem**

For major social media platforms, bots can be a boon, and a consensus is forming that they cannot be trusted to solve this problem on their own. While the Commission's report cites platforms' efforts to remove bots and fake accounts, it is crucial to recognize that the platforms' core incentives do not align with this goal. In fact, bots and fake accounts contribute to increased engagement by users, and they can also inflate metrics that influence how advertisers spend across various channels.<sup>2</sup>

Social media bots benefit platforms by spreading content that boosts engagement. Unfortunately, false, fraudulent, and inflammatory content leads to higher levels of engagement. A recent report

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<sup>1</sup> See Karen Hao, Nearly half of Twitter accounts pushing to reopen America may be bots, MIT Technology Review (May 21, 2020), <https://www.technologyreview.com/2020/05/21/1002105/covid-bot-twitter-accounts-push-to-reopen-america/>.

<sup>2</sup> The report states that bots "are still hard for platforms to detect." But the ad-driven business model on which most platforms rely is based on building detailed dossiers of users. Platforms may claim that it is difficult to detect bots, but they simultaneously sell advertisers on their ability to precisely target advertising based on extensive data on the lives, behaviors, and tastes of their users.





on social media influencers, but also covers other commercial activity.<sup>14</sup> The FTC's authority is limited to "commerce" and generally does not encompass political speech. However, individuals, firms, and corporations operating for

## Conclusion

Congress is right to be alarmed by the explosion of disinformation online driven by bots and fake accounts. We should especially be concerned that tech platforms are now used as weapons to sow divisions in our society and to disrupt civil discourse. Disinformation also pollutes our markets, making it harder for honest businesses to compete.

We cannot simply rely on the platforms to police themselves, given the incentives inherent to their business model. The FTC's authority to prohibit deceptive acts and practices is one way to