Platform Policy: Evaluating Different Responses to the Challenges of Platform Power

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Abstract
This paper starts from the premise that there has been a “policy turn” in questions of internet governance, as politicians and policymakers across multiple jurisdictions grapple with the power of digital platforms, and associated questions of accountability, transparency, market dominance and content regulation. The EU Hate Speech monitoring code, the Christchurch Call, the UK Online Harms Bill, and Australia’s ACCC Digital Platforms Inquiry are manifestations of this trend. But there hangs a question around such initiatives of the appropriateness of national governments as regulators of Internet content, and associated risks in terms of freedom of expression and governmental power as compared to corporate power. In this paper, we will consider different conceptual premises for understanding platform power, arising from neo-pluralist, class and elite theories, as well as the relative significance of non-governmental organizations (NGOs), nation-state governments, corporate self-regulation (e.g. Facebook Oversight Board), and supranational governance mechanisms, such as Tim Berners-Lee’s proposed ‘Contract for the Web’.

The Regulatory Turn in Platform Governance
Over the course of the 2010s, there was a significant shift in public sentiment towards the regulation of digital platforms and online content. There has been growing concern about market dominance by a small number of digital platform giants, and the adverse impact upon traditional news media and entertainment industries arising from the growing dominance of these tech giants over digital advertising and their capacity to squeeze
content creators (Napli 2019; Taplin 2017; Timberg 2015). There is also considerable public debate about the role being played by digital platforms in the distribution of online content, and how relationships between content distributors and users are mediated through such platforms. What Ananny and Gillespie termed ‘public shocks’, or online public events which ‘suddenly highlight a platform’s infrastructural qualities and call it to account for its public implications’ (Ananny & Gillespie, 2017: 2), has arisen on many occasions, include the live streaming of murders, sexual assaults, acts of violence, the Christchurch mosque atrocity on Facebook Live, and most recently, politically incendiary Twitter posts by U.S. President Donald Trump in the context of Black Lives Matter rallies. There have also been major public scandals concerning the misuse of personal data have also plagued the largest platform businesses, most notably Facebook with the 2018 Cambridge Analytica scandal, where the data of up to 87 million Facebook users was harvested by political campaigns such as the 2016 UK ‘Brexit’ referendum and Donald Trump’s presidential election campaign in the U.S. in the same year (Cadwalladr 2020; Flew 2018). The pervasiveness of ‘fake news’ on social media platforms, and the potential for electoral manipulation by politically motivated actors remains an ongoing concern (Allcott & Gentzkow, 2017; Benkler et al., 2018; Caplan, 2017; Flew, 2019), particularly in the context of the November 2020 U.S. Presidential elections. In a strong statement of the societal problems presented by the dominant digital platforms, actor and comedian Sasha Baron Cohen, in his address to the Anti-Defamation league, described digital platforms as ‘the greatest propaganda machine in history’, observing that ‘the algorithms these platforms depend on deliberately amplify the type of content that keeps users engaged – stories that appeal to our baser instincts and that trigger outrage and fear … We have lost, it seems, a shared sense of the basic facts upon which democracy depends’ (Cohen, 2019).

These developments have added up to what The Economist termed the global ‘techlash’ (Economist, 2017), which received concrete manifestation in a range of public inquiries into the power of digital platforms, adverse findings by regulators towards companies such as Google and Facebook, and calls by politicians such as the U.S. Democrat Presidential candidate Elizabeth Warren and others for the break-up of digital platforms (Warren, 2019). What has also become apparent is the recurring cycle of public apologies
and vague calls for more focused self-regulation that have long characterised the responses of the CEOs of digital platforms to data breaches, privacy-related scandals, misuse of market power, or failure to monitor platform content to account for public interest concerns (Tufecki 2018). The EU Competition Commissioner Margerithe Vestager referred to the need for fairness in the dealings of platform giants with regulatory agencies and the wider public, observing that ‘real and fair competition has a vital role to play in building the trust we need to get the best of our societies’ (Vestager 2017), while U.S. Democrat Senator Dianne Feinstein, long considered a friend of Silicon Valley, warned companies such as Google, Facebook and Twitter that ‘you created these platforms, and they are being misused. And you have to be the ones to do something about it—or we will’ (Flew, Martin, and Suzor 2019).

Digital platform companies have historically defended their role as platform intermediaries, and not as publishers of the content hosted on their services. Section 230 of the U.S. Communications Decency Act 1996 (hereafter, ‘CDA’) legally enshrined the principle that, with only limited exceptions, digital platforms cannot be held liable for their users’ generated content. This ‘safe harbor’ protection was afforded to digital platforms to promote innovation and better enable smaller players to enter the market. For platforms, it also means that digital platform companies can decide who and what is allowed on their services as well as extensively curating their platforms to determine the content that users see (Klonick 2017). The majority of the modern social media platforms that are so widely used today did not exist when Section 230 was crafted, but what Tarleton Gillespie has described as the ‘legally elegant’ framing of liabilities for digital platforms (Gillespie 2017), has been a powerful enabler for the rise of the major technology companies (Schwarz 2017).

The structural shift towards a greater propensity to regulate digital platforms can be understood from a few directions. One is the sheer size and scale of the largest digital platform companies has generated such a capacity for market dominance and societal influence that the call for enhanced regulatory power to rein in these corporate behemoths was an almost inevitable countervailing tendency. What has been termed the new ‘antitrust populist’ (Shapiro 2018) focuses particularly upon companies such as Amazon,
Facebook and Google since their influence is seemingly so pervasive and bound up with our everyday experience. It has been noted that six companies (Alphabet/Google, Apple, Amazon, Facebook, Microsoft and Netflix) accounted for two-thirds of all market capitalisation on the Standard & Poor’s 500 from 2015-2019, and this dominance of global equity markets has been accentuated by the onset of COVID-19 which has promoted 'stay-at-home' digital businesses (Godding 2020). The second element is the platformization of the Internet (Flew 2019b), where the socio-economic status of digital platform companies needs to be considered alongside the more general rise of platform businesses (Parker, Van Alstyne, and Sangeet 2016), and how regulation needs to be rethought in an era where such companies operate in multi-sided markets and bring multiple sources of data to bear upon decision-making and governance frameworks.

Finally, the regulatory turn marks a discursive shift in how we think about the internet and the digital environment. Jonathan Zittrain has observed that while the first wave of thinking about the Internet, which covered the 1990s and early 2000s, was strongly associated with rights discourses and a positive framing of the digital future, the second wave form the late 2000s to the late 2010s were associated with discourses of risks, harms and public health, and a much stronger focus upon the adverse consequences of populations being closely interlinked through seemingly abstract algorithmic processes conducted through privately-owned digital platforms (Zittrain 2019). Zittrain argues that the third era, which we are now entering, is the process or digital governance era, where the continued legitimacy of the digital economy and digital culture rests 'not in some abstract evaluation of whether our affordances are structured in ways that are correct or incorrect on one person’s view, but rather if they are legitimate because of the inclusive and deliberative, and where possible, federated, way in which they were settled' (Zittrain 2019): 7).

**Public Inquiries into Digital Platforms**

It is becoming increasingly clear that policymakers, government bodies, and civil society view protections afforded to digital platforms as untenable. Recent significant data breaches, such as the Cambridge Analytica scandal, have demonstrated the extent to which digital platforms can impact democratic culture (Flew, 2018). Digital platforms have
been afforded the opportunity to regulate their own services often done through human and machine content moderation systems (Gorwa et al., 2020). Twitter’s Trust and Safety Council—a group of non-profit organizations tasked with addressing bullying and harassment on the service—is one such initiative. The effectiveness of digital platforms’ self-regulatory measures, however, face growing criticism (Matsakis, 2019). Indeed, it is unclear what role Twitter’s Trust and Safety Council play in mitigating online harms (Flew 2019). At the same time, investigations by civil society and journalists point to social media platforms’ hosting of racist groups (Thompson, 2019). These incidents correspond with a change in the frameworks and narratives around technology regulations (Zittrain, 2019).

Amidst increasing calls to regulate digital platforms and make them more accountable, a spate of inquiries and reports into the operations of these services are being pursued. In recent years, the shift from corporate to state platform governance has been evidenced through an increase in public inquiries. Recent counts indicate that over 70 inquiries, reports, and other investigations focused on digital platforms have been conducted or are underway worldwide (Puppis and Winseck 2019). The focus of these investigations has largely been on the spread of online harms (Tenove, Tworek, and McKelvey 2018; Department for Digital, Culture, Media and Sport and the Home Office 2019), data and privacy (Productivity Commission 2017; Standing Committee on Access to Information, Privacy and Ethics 2019), anti-competitive behavior (Digital Competition Expert Panel 2019), and the impact on journalism (Department for Digital, Culture, Media and Sport 2019; Digital Competition Expert Panel 2019).

The Platform Governance Triangle

Given the recent moves to regulate digital platforms, a range of complex regulatory initiatives now exist. All with varying degrees of power and formality, the regulatory landscape now includes voluntary self-regulation measures, hybrid or multistakeholder initiatives, industry specific, and so on (Gorwa 2019). To help represent the varying
regulatory actors all with vary competencies and interests, Gorwa (2019) outlines the platform governance triangle.

It is useful to understand digital platform regulatory approaches through the platform governance triangle (Figure 1) (Gorwa 2019). Building on Abbott and Snidal's (2009) work on general governance, the platform governance triangle (Gorwa 2019) captures the primary regulatory actors that inform platform governance initiatives. All with varying degrees of power, these stakeholders include three groups of actors: ‘firm’, which include individual and groups of companies, and industry associations; non-government organization (‘NGO’), which comprises civil society organizations, academic researchers, and individuals, among others and; ‘state’, which includes both individual and supranational government groups (Gorwa 2019). The model shows how platform governance initiatives may involve one type of actor or a combination.

![Figure 1 – ‘Platform Governance Triangle’ depicting regulatory initiatives (Gorwa, 2019: 7)](image-url)
Where a regulatory initiative is positioned in the platform governance triangle depends on the amount of influence an actor holds. Drawing on Abbott and Snidal's (2009) original framework, Gorwa (2019: 6) notes that “the model is intended to serve as a heuristic,” meaning that the placement of regulatory initiatives are not intended to serve as exact representations of arrangements. However, initiatives placed in the bottom left corner would represent an initiative that was controlled by NGOs. For instance, the Manila Principles on Intermediary Liability (MAP)—a global civil society initiative to promote freedom of expression and innovation—would be represented in this section (see Figure 1 quadrant 3) of the triangle. The Christchurch Call (CC)—an initiative against terrorist and violent extremist content online—would be placed between state and firm (see Figure 1 quadrant 4), given that New Zealand Prime Minister Jacinda Ardern and French President Emmanuel Macron joined to bring together technology leaders and governments.

**The Move to Nation-State Regulation**

There has been a real change in the way that governments have considered regulation. For (Gorwa, 2019)

> “we have moved from a discourse around rights – particularly those of end-users, and the ways in which abstention by intermediaries is important to facilitate citizen flourishing – to one of public health, which naturally asks for a weighing of the systemic benefits or harms of a technology, and to think about what systemic interventions might curtail its apparent excesses.”

Indeed, examining the range of global investigations highlights a shift to curb the spread and amplification of harmful online content. The United Kingdom’s online harms white paper (Department for Digital, Culture, Media and Sport and the Home Office 2019), for instance, is concerned with illegal and unacceptable content and activity that is visible online. The white paper seeks to tackle online content or activity that harms individual users, particularly children, or that which threatens the way of life in the UK. In particular, the white paper outlines the problem of illegal content online, such as the live streaming of child exploitation material and terrorist propaganda, and harmful online content, such
as cyber bullying and disinformation. While a draft bill is still pending, in a partial response to the white paper, the UK government listed existing communications watchdog Ofcom as its preferred regulatory body. According to the UK government (Department for Digital, Culture, Media and Sport 2020), this move “would allow us to build on Ofcom’s expertise, avoid fragmentation of the regulatory landscape and enable quick progress on this important issue.”

In December 2017, The ACCC was instructed by the then-Treasurer of Australia’s Liberal-National Party coalition, the Hon Scott Morrison MP, to conduct an inquiry into digital platforms (Flew 2018). Heralded as the first of its kind, the Inquiry departed from earlier digital platform investigations. The most notable feature that distinguishes the Inquiry is the breadth of scope, “traversing not just competition, but consumer protection, unfair trading, data protection and privacy related considerations, and, importantly, the intersections between them” (Beaton-Wells, 2019: 2). In the ministerial direction, the Hon Scott Morrison MP called for an inquiry into “digital search engines, social media platforms and other digital content aggregation platforms” with a particular focus on “competition in media and advertising services markets” (Morrison 2017). To that end, the Inquiry primarily considered the impact of social networking platform Facebook and search engine giant Google. However, the ACCC’s recommendations have implications for a broad range of digital platforms, which will extend beyond media and advertising (Beaton-Wells 2019). In addition to economic concerns, the Inquiry also highlighted threats to public interest journalism.

The common thread that binds these investigations is the move toward nation-state and supranational regulation of digital platforms. The regulatory tide has sharply turned from allowing digital platforms to decide what content is permissible on their services (Bridy 2019; Helberger, Pierson, and Poell 2018). This marks a shift from digital platforms’ self-regulatory measures responding to ‘public shocks’ (Ananny and Gillespie 2017) towards nation-state and supranational regulation. Taken together, it is likely that the various public inquiries worldwide will shape the understanding of what resembles appropriate digital platform regulation (Flew 2019a).
But despite the move by governments to regulate digital platforms, there hangs a question around such initiatives of the appropriateness of national governments as regulators of Internet content. State, firm, and NGO actors usually present the issue of digital platform regulation as a balancing exercise between freedoms. Indeed, a common concern is the extent to which governmental power poses a threat to freedom of expression (Gorwa 2019). Germany’s Network Enforcement Act, which is better known as NetzDG, provides that digital platforms must remove harmful content from their services within 24 hours of receiving notice. There is a real risk that such hasty processes “may trade valuable expression for speedy results” (Citron, 2017: 1035). The internet’s libertarian past and founding values of freedom are so pervasive that many critics argue against any form of content regulation. This also raises questions surrounding who decides what is or is not permitted online (Flew 2019).

**Approaches to Platform Power**

One way of thinking about structural and discursive changes associated with the turn to digital platform regulation is through the interaction between the ‘three I’s’ of ideas, interests, and institutions. This framework, which has been influenced by neo-institutional approaches to media and communications policy (Bannerman and Haggart 2015; Cunningham, Flew, and Swift 2015; Denzau and North 1994; Loisen 2012; Picard 2020), which proposes that a concept such as platform power, and its intersection with questions of policy, needs to be understood as revolving around three interconnected elements:

1. **Ideas:** ways of thinking about material objects and relationships that rise of prominence and general social acceptance, but are in turn challenged by other competing ideas;

2. **Interests:** institutions and organizations that seek to advance individual or collective social power through the economic, political and cultural spheres;
3. **Institutions**: the organizational forms that both govern and regulate social, economic and political relations, and through which collective decision-making occurs.

We can see, for instance, how a rights-focused understanding of the Internet intersected with the interests of the emergent digital businesses of ‘Silicon Valley’, as they needed to differentiate their communications and social media platforms from traditional media companies. Such ideologies and interests were reinforced through legislation such as Section 230 of the U.S. Communications Decency Act and other comparable laws, such as the 2001 European Union E-commerce Directive, which enshrined the principle of ‘safe harbor’ for platform companies from liabilities arising from the activities of their users on the platform (Flew, Martin, and Suzor 2019).

This configuration of institutions and power has been challenged for some time. U.S. President Donald Trump’s invocation in May 2020 of an Executive Order proposing a review of Section 230 of the CDA (or ‘REVOKE 230!’ to use the terminology of Trump’s Tweet) may well have been political theatre, and unlikely to survive a legal appeal (Stacey, Murphy, and Bradshaw 2020). But the Republican President’s threat of action towards social media platforms follows from similar calls to rein in the power of ‘Big Tech’ by Democratic Party presidential contenders including Elizabeth Warren, Bernie Sanders, Amy Klobuchar and eventual nominee Joe Biden. Indeed, Biden told The New York Times that:

Section 230 should be revoked, immediately should be revoked, number one. For Zuckerberg and other platforms … It should be revoked because it is not merely an internet company. It is propagating falsehoods they know to be false, and we should be setting standards not unlike the Europeans are doing relative to privacy. You guys still have editors. I’m sitting with them. Not a joke. There is no editorial impact at all on Facebook. None. None whatsoever. It’s irresponsible. It’s totally irresponsible (Editorial Board 2020).
In order to discuss platform power and its relationship to policy, it is insufficient to simply invoke platform bigness as a guiding principle. The economist Richard Langlois has made the point that the competitive process does not rest primarily upon the absence of large firms (Langlois 2018), and Flew and Winseck have observed that there is a long history of media conglomerates failing to derive benefits from sheer size (Flew 2011; Winseck 2019). Platform power needs to be situated in a wider framework of approaches to media power (Freedman 2015).

The dominant framework for conceiving of digital platform regulation is the *neo-pluralist model*, which focuses on the centrality of interest groups to the policy-making process, through their interactions with agencies and institutions of government. From this perspective, digital platform companies represent ‘material economic interests’ (Dryzek & Dunleavy, 2009, p. 45) which achieve collective form through industry associations and political lobbying, and interact with other material economic interests (e.g. trade unions, traditional publishing and broadcasting industries) and interests formed through civil society and non-government organisations. The neo-pluralist model of media and communications policy equates with the *stakeholder* approach to policy development. Stakeholder analysis is ‘associated with conceiving of society as a set of organized and competing interests, and identifying the role of the state and policy-making institutions as one of reconciling these competing interests toward shared goals’ (Flew & Lim, 2019, p. 541). From this perspective, policy-makers have a critical facilitative role, both bringing their own expertise to the issues at hand, and enabling dialogue between competing interests in order to steer the policy process towards outcomes likely to achieve a high level of stakeholder consensus. Stakeholder analysis also aligns with notions of *corporate social responsibility*, and the idea that the modern corporation has public obligations over and above its obligations to maximise profits for shareholders (Freeman, 1984; Hutton, 1996); this is sometimes referred to as the *social licence to operate*.

Cammaerts and Mansell have critiqued the neo-pluralist approach on the grounds that ‘in most of these deliberations, the underlying logics of the platforms’ business strategies are not being fundamentally challenged’, and they question whether ‘some mix of older and newer policy and regulatory responses, if implemented effectively, will provide assurance
that the dominant platforms will be incentivized to operate in a manner consistent with the public interest’ (Cammaerts and Mansell, 2020: 137). Alternative perspectives on power include those derived from *elite theories*, where such exercises are largely exercised in symbolic policy-making (Edelman 1964), and where policy-makers lack the political will to make more substantive changes, and *class theories*, which would draw attention to contradictions within the capitalist class, such as those between the digital platform companies and traditional media and creative industries businesses around paying for content and the enforcement of intellectual property laws (Freedman 2015).

**Case Studies**

We conclude this paper with a brief consideration of three responses to the challenges presented by digital platform power from the perspective of media regulation.

The first is that of the Digital Platforms Inquiry undertaken through the Australian Competition and Consumer Commission. The ACCC’s Inquiry took place over 18 months and its Final Report was published in June 2019 (Australian Competition and Consumer Commission 2019). Its recommendations covered changes to merger laws for digital platforms, an inquiry into digital ad tech services, harmonization of the media regulatory framework between platforms and other media, grants for local journalism, digital media literacy initiatives, strengthened privacy provisions, and a legally binding Code of Conduct for relations between digital platforms and news media businesses to address imbalances in bargaining relationships. In December 2019, the Australian Government published its response to the Final Report, where it accepted 19 of the ACCC’s 23 recommendations, including advancing the Code of Conduct, which ACCC Chair Rod Sims described as the most important recommendation of the ACCC Report (Sims 2019).

In terms of the platform governance triangle, the ACCC recommendations mark a significant reassertion of the power of nation-state regulatory agencies to make policies to which global digital platform companies will be subject. The inquiry process was dominated by the representatives of Google and Facebook on the one hand, and media businesses such as News Corporation and the Nine-Fairfax group on the other, and the
key areas of contention have been around whether platform companies should make financial contributions to news publishers as a requirement of carrying their news content on these platforms. Civil society organisations were surprisingly disengaged from the inquiry process: out of the 68 submitters to the Inquiry’s initial issues paper, only 5 were civil society actors (Australian Competition and Consumer Commission 2018). So while the ACCC Digital Platforms Inquiry was based explicitly around a stakeholder approach to policy formation, it has in practice become a test of strength between traditional media and digital platforms, with the Australian Federal Government strongly inclined to support the traditional media businesses.

A second and very different approach to digital platform regulation can be seen with the announcement of the Facebook Oversight Board by Facebook in May 2020. In response to increasing pressure for digital platforms to better address the harmful content hosted on their services, Facebook established an Oversight Board to oversee appeals of Facebook’s content moderation decisions. The Facebook Oversight Board comprising of 40 members from around the world, and drawn from politics, civil society organisations, the media and universities (Clegg 2020). Establishment of the Board responds to a need identified by Facebook CEO Mark Zuckerberg in 2019 for ‘third-party bodies to set standards governing the distribution of harmful content and to measure companies against those standards’, and where ‘regulation could set baselines for what’s prohibited and require companies to build systems for keeping harmful content to a bare minimum’ (Zuckerberg 2019).

How the Facebook Oversight Board fares in practice very much remains to be seen. From the perspective of platform governance, it can be seen as being located within the firm space or the firm-NGO space. One way of understanding the establishment of the Board is as a form of pre-emptive self-regulation, where Facebook strengthens its internal governance processes as an alternative to external regulation. The familiar risks of self-regulation are the potential for conflicts of interest, under-enforcement of rules and inadequate sanctions, and the lack of accountability that would exist if the company was required to report to an independent regulator (Baldwin et al., 2012, pp. 143-146; Freiberg, 2010, pp. 30-31). It also inhibits the development of a regulatory framework for
digital platforms as a whole, with the potential for considerable fragmentation of rules and regulations for Facebook as compared to Twitter.

A final approach to be considered is that of the Contract for the Web, as a global Internet governance framework initially developed by Tim Berners-Lee, supported by various ICT and digital platform companies as well as NGOs (Contract for the Web 2020). The status of the Contract for the Web is unclear, although the nature of the signatories to it (including Amazon, Google, Microsoft and Facebook) suggest that it is more than a thought bubble. It identifies distinctive roles for governments, companies and citizens in maintaining an open Internet, focusing upon the themes of access, privacy, data rights, content governance, and affordability. Interestingly, given the discussion in this paper, its focus is very much upon restraining the reach of governments in content and data-related areas, seeing the management of digital platforms as very much the domain of the companies themselves.

In that respect, the Contract for the Web can be seen as a Firm-NGO partnership, harking back to earlier rights-based approaches to Internet governance, which see governments as the main threat to individual rights and liberties in the online environment. As noted earlier, the risks of self-regulation have become all too familiar, with many digital platforms implementing regulatory initiatives that have been heavily scrutinized for their limited action and ability to meet their aims (for example, Twitter’s Trust and Safety Council). For Redeker (2019: 2), the ability for the Contract to meet its aims depends on: “The legacy of the process of creating the document and the mobilization of a broad and stable coalition around it.” In a step in the right direction, the Contract emphasizes the importance of accountability of its signatories. However, like many other regulatory initiatives, the Contract lacks legal enforceability. In the absence of legal enforceability, “the Contract appears to fit neatly into a conversation about rights, principles and power limitations for the Internet” (Redeker, 2019: 2). Despite 800 organisations and thousands of individuals declaring their support for the Contract, how it will meet its goals and achieve meaningful change remains to be seen. One reading could be that it is a form of “pseudo-regulation” (O’Malley 1987) or “symbolic policy” (Edelman 1964) designed primarily to head off nation-state regulation.
Conclusion

The regulatory turn in platform governance potentially indicates a very significant shift, both in media and communications policy, and in the role played by nation-states in platform governance. Digital platforms were once shielded from substantive regulation, partly by legal provisions such as Section 230, but also by the overarching positioning of such platforms as a “force for freedom and democracy” (Bradshaw and Howard, 2019: 21), that needs independence from state regulation. This discourse still exists, as seen by both the reaction to President Trump’s Executive Order to revoke Section 230, but also through the role identified for mobile social media in movements such as Black Lives Matter. At the same time, a variety of concerns, ranging from potential social harms associated with content distributed through digital platforms (Zittrain 2019), through to abuses of privacy and the misuse of user data, to the obvious political and economic power of the digital platform giants, have triggered a tipping point where policy actions to regulate digital platforms are becoming the norm rather than the exception in liberal democracies. The spate of public inquiries and reports underway have illuminated the problems, but they of course cannot address the political challenges involved in meaningful policy action. In terms of the platform governance triangle drawn upon in this paper, we are moving from the era where platform companies essentially regulate themselves. The precise configurations of firm-state-NGO relations that will arise out of emergent forms of digital platform governance is currently in the process of being forged.
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