

**SBS SUBMISSION TO THE AUSTRALIAN COMPETITION AND CONSUMER COMMISSION  
(ACCC)**

**DIGITAL PLATFORM SERVICES INQUIRY  
MARCH 2023 REPORT ON SOCIAL MEDIA SERVICES ISSUES PAPER**

**SEPTEMBER 2022**

**I. Key Points**

- Social media platforms are a key component of SBS's ability to extensively deliver its content and services, and to reach and engage with audiences where they are, fulfilling its Charter obligations in an efficient and effective way. Facebook remains the dominant platform among SBS's audiences.
- SBS therefore takes a strong interest in the matters raised in the Issues Paper. In this submission, SBS:
  - Notes that SBS's accurate and trusted content available through social media is important in counterbalancing online misinformation and disinformation—this is directly relevant to the issue of *'the use and abuse of social media services for scams and misleading or deceptive content'* raised by the Issues Paper<sup>1</sup>;
  - Reiterates SBS's previously raised concerns and suggestions, relevant to the Issue Paper's consultation question no. 7) *'What features and related services do social media platforms provide to users? How have these changed over time?'*<sup>2</sup> SBS's concerns include in relation to currently insufficient notification of upcoming changes; and improvement to moderation tools (see [Section III.](#), supplemented by [Appendix A](#) of this submission) available to organisations such as SBS, which rely extensively on social media;
  - Outlines a number of issues relevant to SBS, in response to the Issue Paper's consultation questions; and
  - Outlines the ways in which social media constitutes a key part of SBS's Charter-led activities and essential services of high public value.
- SBS also notes that there are ongoing inquiries and reviews addressing other important matters relevant to social media. SBS is an active participant in these other processes.
- SBS welcomes further engagement with the ACCC on these and relevant matters.

**II. Introduction**

SBS appreciates the opportunity to respond to the ACCC's *Digital Platform Services Inquiry March 2023 Report on social media services Issues Paper* (the **Issues Paper**).

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<sup>1</sup> Issues Paper, page 3.

<sup>2</sup> Issues Paper, page 12.

SBS is a user and advertiser on social media, promoting its services organically through manual 'posting' of its content on SBS social media accounts, and via paid advertising options offered by the platforms.

Social media platforms are a key component of SBS's ability to extensively deliver its content and services, and to reach and engage with audiences where they are. To this extent, social media is key to SBS's ability to fulfil its Charter obligations as a public media provider in an efficient and effective way (see [Section IV](#), for further details).

Facebook remains a dominant platform among SBS audiences, particularly multilingual Australians.<sup>3</sup> To illustrate the scale of its dominance among our audiences, the emerging and popular platform, TikTok, has delivered less than 1% of the engagements delivered by Facebook in the first half of 2022.

### **III. Insufficient notification of upcoming changes, and insufficient moderation tools remain key concerns for SBS as a user and advertiser on social media platforms, among other things**

#### *Insufficient notification of upcoming changes*

Relevant to the Issue Paper's consultation question no. 7) '*What features and related services do social media platforms provide to users? How have these changed over time?*'<sup>4</sup>, SBS has previously made a number of submissions to various inquiries<sup>5, 6, 7, 8, 9, 10, and 11</sup>. The submissions examined issues faced by users, such as SBS and other organisations, including in relation to features provided by social media, on which they rely to deliver services and reach and engage with consumers (audiences). A range of issues raised in those submissions are yet to be fully addressed by the social media platforms.

As a key example, SBS previously proposed that sufficient notices should be communicated to organisations that use and advertise on social media such as SBS, in relation to upcoming changes to algorithms and the way content is presented on social media platforms (e.g. changes to video formats). In the ACCC's consultation on the draft bill of the *Treasury Laws Amendment (News Media and Digital Platforms Mandatory Bargaining Code) Act 2021* (the **Bargaining Code**), SBS previously [submitted](#) that a 90 day notice period is preferred.<sup>12</sup> We note that the Bargaining Code, as assented to in March 2021, contains a provision for a notification period of 14 days, to be provided by designated platforms. However, as there has been no designation of any platforms under the Bargaining Code at the time of writing, the issue of insufficient notification (and indeed, any regulation of algorithm modification) therefore remains.

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<sup>3</sup> *SBS Multilingual Research 2020*, A large-scale online survey conducted in 10 languages, with 5,405 Australians who speak another language other than English.

<sup>4</sup> Issues Paper, page 12.

<sup>5</sup> SBS submission the House of Representatives Select Committee on Social Media and Online Safety's inquiry (January 2022), available [here](#).

<sup>6</sup> SBS submission in response to the ACCC's Advertising Services (Ad Tech) Inquiry – Interim Report (March 2021), available [here](#).

<sup>7</sup> SBS response to the Draft Industry Code of Practice on Disinformation, developed by DIGI (November 2020), available [here](#).

<sup>8</sup> SBS submission to the Australian Competition and Consumer Commission's Advertising Services (Ad Tech) Inquiry – Issues Paper (May 2020), available [here](#).

<sup>9</sup> SBS submission to the Select Committee on Foreign Interference through Social Media inquiry (March 2020), available [here](#).

<sup>10</sup> SBS submission to the Department of Infrastructure, Transport, Regional Development and Communications Online Safety Legislative Reform discussion paper (February 2020), available [here](#).

<sup>11</sup> SBS submission to the Treasury's consultation on ACCC Digital Platforms Inquiry – Final Report (September 2019), available [here](#).

<sup>12</sup> SBS submission to the ACCC News Media Bargaining Code – Draft Legislation (August 2020), available [here](#).

### *Insufficient moderation tools*

Also relevant to the consultation question no. 7), social media platforms that provide user-generated content, comments, or reactions, particularly Facebook the dominant platform among SBS audiences<sup>13</sup>, should provide enhanced moderation tools to all users, across all types of posts to further prevent online harms to Australian consumers. SBS has previously raised this in its January 2022 [submission](#) to the *Inquiry into Social Media and Online Safety* by the House of Representatives Select Committee on Social Media and Online Safety<sup>14</sup>—as extracted in **Appendix A** of this submission..

SBS acknowledges the usefulness of Facebook's word-filter moderation functionality, introduced in late 2021, which has assisted SBS in dealing with inauthentic or malicious contributions, however, further enhancement to moderation tools that should be provided by social media platforms (or regulation) include:

- pre-moderation;
- ability for an organisation to efficiently (e.g. via 'one-click') and centrally manage tools across its portfolio on a social media platform;
- ability to deal with in-language user comments, and non-text comments such as those via images or video files;
- ability to moderate fragments of comments;
- ability to pre-set the period after which comments will be closed;
- ability to pause live video comments;
- ability to automatically block inauthentic or malicious contributions;
- priority moderation of local comments over comments made from other countries; and
- export logs of activity, for transparency and better moderation management

Please also see **Appendix A** for further details on improvement to these moderation tools that Facebook should provide.

Importantly, the use of moderation tools should not impact the prominence of an organisation's posts. In other words, the reach of trusted content such as content provided by SBS should not be impacted by legitimate use of moderation tools to minimise the risk of online harms to consumers.

### *Scams and misleading or deceptive content are increasing*

As canvassed in the Issues Paper—on '*The use and abuse of social media services for scams and misleading or deceptive content*'<sup>15</sup>, SBS's operations on social media have seen ongoing rise of scam messages, and misleading and deceptive content, such as instances of 'fake news' seen during the height of the COVID-19 pandemic.

It is important to note that SBS's accurate and trusted content available through social media helps to counterbalance online misinformation and disinformation (see **Section IV**, for further details).

Also relevant to this, SBS takes seriously the issue of password security, particularly among organisations with multiple users needing access social media platforms such as SBS, which have more vulnerable points to malicious attacks.

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<sup>13</sup> Same as 3.

<sup>14</sup> SBS submission the House of Representatives Select Committee on Social Media and Online Safety's inquiry (January 2022), available [here](#).

<sup>15</sup> Issues Paper, page 3.

### *Current competition trends and issues*

The Issues Paper's consultation question no. 11) asks '*Are there any trends in consumer behaviour or preferences that may impact on competition in the future? If so, describe what they are.*'<sup>16</sup>

Relevant to SBS, short-form video, made very popular by TikTok, is creating consumer expectations for similar offerings, and impacting how publishers including SBS produce content and allocate resources to meet the increasing demand.

It remains to be seen whether there will be social media platforms' offerings that purposely differ from this trend. There could be benefits arising from the platforms' unique innovations and offerings into the future.

There are also increasing consumer expectations of timely responses from organisations via direct messaging, rather than through e-mail or telephone. These expectations impact competition among similar organisations that operate on social media, requiring them to have appropriate resources, responsiveness, and agility to meet these consumers' expectations.

Consumer expectations of 'free' news content also influences competition among social media platforms in their offerings of news content—with a critically significant impact on news media organisations. Please see [Section V](#), further below in relation to this.

*Accuracy and transparency of data provided by social media platforms are important to SBS as an advertiser*

The Issues Paper consultation question 17) asks '*To what extent are advertisers able to compare the performance of advertising on different social media platforms? To what extent are advertisers able to compare the performance of different types of advertising on social media platforms with advertising on other websites and digital platforms?*'<sup>17</sup>

It is relatively easy for advertisers such as SBS to obtain basic performance data such as cost per each ad impression or ad result, or the number of ad impressions and clicks, to compare advertising performance on different social media platforms,

However, there is an ongoing issue—whether the performance data provided by social media platforms are accurate, as the methodology and algorithms generating the data are not always clearly available nor visible to advertisers.

SBS notes that more granular data tend to be provided in aggregation, rather than at individual consumers' levels, as a result of increasing consumer preferences that online actions not be tracked. The accuracy of these data, therefore, rely even more on the platforms' ability to provide estimations of a range of performance measurement metrics such as performance by audience segments.

### **IV. Social media is an important means for SBS in delivering its Charter in the provision of the following essential services to all Australians**

A key strategic priority for SBS is to ensure our services are as widely available to our audiences as possible, to ensure we fulfil our Charter and our stated purpose to inspire all Australians to explore, respect and celebrate our diverse world and in doing so, contribute to a cohesive society

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<sup>16</sup> Issues Paper, page 12.

<sup>17</sup> Issues Paper, page 13.

Relevant to consultation question no. 4) 'Do particular events influence users' use of social media services, for example, during natural disasters or the COVID-19 pandemic?'<sup>18</sup>, given the centrality of social media in the Australian community SBS serves, these platforms hold particular importance as a key means of reaching and engaging with audiences and meeting our Charter obligations, delivering our essential services including in relation to crisis events including natural disasters, and the COVID-19 pandemic; countering misinformation; and supporting civic participation.

According to SBS's *Multilingual Research 2020*, multilingual audiences are more engaged with social media than the general Australian population.<sup>19</sup> It is, therefore, important for SBS's content to be available on social media, as part of SBS's Charter-led obligations to serve multilingual and multicultural Australians.

It is also relevant to note that a significant number of First Nations peoples—by, for, and about whom SBS provides services pursuant to its Charter—significantly own and use mobile devices to access content, with mobile-only internet use among First Nations peoples exceeding that of the general population.<sup>20</sup> SBS services to relevant audiences, led by the National Indigenous Television (**NITV**), accordingly, have also seen high online and social media engagement from First Nations peoples. This further underlines the importance of social media to SBS.

The following part of this submission outlines in further detail many of the essential services SBS provides, and describes how social media platforms form a key part of connecting audiences to those services.

### ***SBS news and current affairs services are highly trusted and valued, and help to counter misinformation and disinformation***

SBS offers comprehensive coverage of news and current affairs, with a uniquely inclusive SBS perspective, for all Australians including multilingual, multicultural Australians and First Nations peoples.

- *SBS News* service is the main umbrella of our news and current affairs—available via broadcast television, SBS Radio services (curated specifically for individual language communities), SBS websites (including SBS On Demand), mobile apps, and social media including [Facebook](#) and [Twitter](#)—with significant growth across [YouTube](#), [Instagram](#) and some use of [TikTok](#) platforms.

These *SBS News* social media accounts also actively promote and provide audience access to content from

- *SBS World News* – nightly bulletins that perform a distinctive role in bringing the biggest global stories to a local audience.
- The recently launched SBS WorldWatch television channel – the new home of *SBS عربي News* and *SBS 中文 News* as well as major news bulletins from more than 45 countries around the world, in more than 30 languages.
- The recently launched *SBS عربي News* and *SBS 中文 News* bulletins every weeknight – produced by SBS's local bilingual journalists, and offering impartial coverage, insightful context and balanced analysis of the major

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<sup>18</sup> Issues Paper, page 11.

<sup>19</sup> *SBS Multilingual Research 2020*, A large-scale online survey conducted in 10 languages, with 5,405 Australians who speak another language other than English.

<sup>20</sup> Thomas J, Barraket J, Wilson CK, Holcombe-James I, Kennedy J, Rennie E, Ewing S and MacDonald T (2020) *Measuring Australia's Digital Divide: The Australian Digital Inclusion Index 2020*, RMIT and Swinburne University of Technology, Melbourne, for Telstra; Townsend P., Halsey J. R., & Guenther J. (2016). [Mobile Learning Congruencies with Aboriginal and Torres Strait Islander Cultural Philosophies](#), *Publishing Higher Degree Research*, p. 25—which stated that '70% of Aboriginal and Torres Strait Islander people own a smartphone, and in remote communities 43% of Aboriginal and Torres Strait Islander people own a smartphone'.

national and international stories, in Arabic and Mandarin. Both bulletins are available for catch-up on SBS On Demand, which has significant social media presence (see further below), with English subtitles added.

- NITV, with active presence on [Facebook](#), [Instagram](#), [YouTube](#), and [Twitter](#) provides daily news, and current affairs programs including *The Point* and *Living Black* (the latter with dedicated presence on [Facebook](#)) from First Nations perspectives.
- *Insight* television and online program, with active presence on [Facebook](#), [Instagram](#), [YouTube](#), and [Twitter](#), brings together storytellers and audience members, exploring strong and deep personal stories of everyday Australians.
- *Dateline* television and online program, with active presence on [Facebook](#), [Instagram](#), [YouTube](#), and [Twitter](#), provides compelling in-depth international stories including through its digital-only mini-documentary stream.
- *The Feed* online service, with active presence on [Facebook](#), [Instagram](#), [YouTube](#), and [Twitter](#), explores global and local issues through experts and first-person stories with a welcome dose of comedy and satire as it always finds a fresh new way of storytelling.

Research in April 2022 indicates that SBS is the most trusted media brand in the Australian market.<sup>21</sup> This corroborates findings by the internationally renowned *Reuters Digital News Report* (of which the latest (11<sup>th</sup>) edition was published in June 2022) that SBS and ABC continue to be the most trusted news media brands in Australia. According to Reuters, trust in the SBS brand is at 65 per cent—up to 21 percentage points higher than commercial television networks, and up to 24 percentage points higher than those of newspapers' brands.<sup>22</sup>

SBS has rigorous editorial standards (including its Code of Practice<sup>23</sup>) in place, which underpin the delivery of its independent, balanced and quality news and current affairs services—including services in languages other than English. SBS is required to notify its Code of Practice to the Australian Communications and Media Authority (the **ACMA**), which also acts as a point of escalation for broadcast complaints made under the Code of Practice which have not been resolved by SBS's independent Ombudsman.

Therefore, and as outline earlier. SBS's accurate and trusted content available through social media is important in counterbalancing online misinformation and disinformation.

*SBS provided live interpreting of NSW and Victorian governments' press conferences at the height of the COVID-19 pandemic (August to October 2021)*

In 2021, SBS undertook live interpreting of the NSW and Victorian governments' press conferences during COVID-19 related lockdowns and public orders. This work provided a critical link between multilingual audiences and the primary sources of information and advice during the crisis.

The live interpreting of NSW Government updates was broadcast on the SBS television network and streamed nationally on SBS On Demand. Importantly, SBS also utilised social media to enhance and expand the value and impact of this essential service at a time of public crisis to many language communities, with the updates available live (and for catch-up) via SBS Facebook pages in ten corresponding languages: [SBS Arabic24](#), [SBS Bangla](#), [SBS Assyrian](#), [SBS Cantonese](#), [SBS Greek](#), [SBS Khmer](#), [SBS Mandarin](#), [SBS Spanish](#), [SBS](#)

<sup>21</sup> According to SBS Brand Pulse survey in April 2022; *Q How do you trust the following media brands?* Base: All Australians; Total sample n=750.

<sup>22</sup> Reuter Institute and the University of Oxford's *Digital News Reports 2022* available at [https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2022-06/Digital\\_News-Report\\_2022.pdf](https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2022-06/Digital_News-Report_2022.pdf)

<sup>23</sup> SBS Codes of Practice <https://www.sbs.com.au/aboutus/sbs-code-of-practice>



[Urdu](#), and [SBS Vietnamese](#)—which received more than 2,200,000 views and 6,750,000 minutes watched.

The live interpreting of Victorian daily updates was also available via SBS Facebook pages in [Arabic](#), [Somali](#), and [Urdu](#) languages.

*SBS provided live interpreting of Leaders' Debates and the 2022 election outcome speeches*

In an Australian media first and available via Facebook, SBS provided an essential service that helps underpin Australia's democracy—the live interpreting of the three Leaders Debates in up to four languages (Arabic, Mandarin, Cantonese and Vietnamese)<sup>24</sup>, working with Nine and the Seven Network and Sky News, as well as two additional Ministerial Debates held at the National Press Club of Australia in Arabic and Mandarin with the ABC. Arabic and Mandarin-speaking audiences also heard the concession and victory speeches on election night.

### ***SBS Audio and Language Content (SBS Radio) provides essential services via broadcast radio, websites, and social media***

SBS Radio's language service teams not only provide essential news and information in more than 60 languages; the teams also have unique access, through the communities' trusted and close relationship with SBS, to tell stories from Australia's diverse communities.

SBS's seven linear terrestrial radio stations delivers accurate and balanced news, current affairs, and information as well as sport, music, and entertainment. SBS Radio services also provide content via the easy-to-access and 'always on' SBS Radio App and online—through articles, catch-up radio programs, podcasts, and video.

Through active presence by most of SBS's more than 60 language services on multiple social media platforms including Facebook, Instagram, YouTube, Twitter, Weibo, and WeChat, SBS Radio helps connect diverse community members (including those in their homelands). This means of communications is important because SBS's content must be present where its Australian audiences are, to ensure that communities have options to interact with, and benefit from SBS services,

SBS Radio services also offer content specifically curated for newly arrived migrants through the [SBS Settlement Guide](#) in more than 50 languages available via the language services' radio, online, and social media accounts.

#### *SBS Settlement Guide*

The SBS Settlement Guide speaks to the core of the SBS Charter<sup>25</sup> and helps address the language barriers faced by multilingual communities in navigating life in Australia. Building on SBS Radio's long history of providing balanced and impartial news and information, the SBS Settlement Guide was launched in 2016, with more than 50 SBS language services producing broadcast and online settlement features.<sup>26</sup>

These features include explanation of 'need-to-know' facts about settling in Australia, for example, the features help explain, in the migrants' preferred languages, preparation for Australia's crises/disasters such as the floods and fires, Australia's health (including mental health) and justice systems, local culture and history, available government services, as well as provide 'how-to' practical advice such as how to apply for a job, access medical services, surf safety, find a playgroup, enrol to vote, or lodge a tax return. Each Settlement

<sup>24</sup> Leaders Debates are available in these languages on [sbs.com.au/ondemand](https://www.sbs.com.au/ondemand)

<sup>25</sup> <https://www.sbs.com.au/aboutus/sbs-charter>

<sup>26</sup> SBS Settlement Guide available at <https://www.sbs.com.au/radio/settlement-guide>, among the more than 50 languages in which it is available, the following language services regularly produces Settlement Guide: Bangla, Filipino, Gujarati, Hindi, Indonesian, Korean, Malayalam, Nepali, Punjabi, Sinhalese, Tamil, Urdu, Arabic, Cantonese, Mandarin, Vietnamese, Kurdish, Spanish, Amharic, Dari, Dinka, Persian, Khmer, Pashto, Swahili, Thai, Tigrinya, Turkish, Hmong, Hakha Chin, Karen, Kirundi, Mongolian, Rohingya, Tibetan, and Somali.

Guide is produced in-house as an audio feature for radio, a text article for online and a 'listicle' for sharing on social media. These features help those who do not speak English well understand and participate more fully in Australia's civic society, contributing to social integration and social cohesion.

SBS is continually developing additional Settlement Guide information, as a resource for multilingual and multicultural communities and settlement services.

[SBS Radio adjusts its services every five years](#) subsequent to each Australian Census, to ensure its services reflect and meet the language needs of Australia's rapidly changing and increasingly diverse society.

SBS also provides [SBS News in Easy English](#) and [SBS Learn English](#) services (the latter with dedicated [Facebook](#) presence)—regular podcasts for new users and learners of the English language as well as those with accessibility requirements.

### ***SBS On Demand is the first Australian-based major video-on-demand service to provide multilingual communities with preferred-language interface and content***

SBS On Demand has been a repository of SBS's video-on-demand content with active presence on multiple social media platforms—[Facebook](#), [Instagram](#), and [Twitter](#) to promote and maximise the benefits of this content. The service also has an essential role in response to crisis events such as the coronavirus pandemic. Many of the video content (such as the coronavirus explainer, 'how to wear a mask', and vaccine explainer) were produced in collaboration with federal and state government entities.

Since 2020, SBS On Demand has become the first Australian-based major video-on-demand platform to offer multilingual login options, currently providing users with Arabic, Simplified Chinese, Traditional Chinese, Korean, Hindi, and Vietnamese interfaces. With multilingual login and navigation, we can ensure access to SBS On Demand for many of Australia's language communities—so they have access to news, entertainment and information, as they become available, that they may otherwise not have access to. We are committed to continuous enhancement of our end-to-end multilingual product experience on SBS On Demand which will include browse by language capabilities, dedicated language collection pages, and many other features to enhance the multilingual audience experience.

### **V. Other matters are being addressed by ongoing inquiries and reviews**

As a critically important example, SBS notes the ongoing review of the Bargaining Code, which takes into account the dominant social media platform—Facebook. SBS has provided a submission to the review by Treasury, the submission includes proposals for amendment of the designation provision of the Bargaining Code. Such amendment could help to ensure that the policy objectives of the Bargaining Code are met, and that the Bargaining Code works as intended to support strong, independent public-interest media.

SBS also notes current work by Defamation Law Working Group regarding *Background Paper: Model Defamation Provisions 2022 (Consultation Draft) of the Stage 2 review of the Model Defamation Provisions, Part A: liability for internet intermediaries for third-party content*. SBS is a member of the Australia's Right to Know (**ARTK**) coalition of media organisations, and is working with ARTK in relation to the coalition's response to the Consultation Draft.

### **VI. Conclusion**

SBS appreciates the opportunity to respond to the ACCC's Issues Paper—of which matters raised therein is of strong interest to SBS. This is because SBS extensively relies on social media platforms to reach and engage with its audiences both in terms of content and advertising—to efficiently and effectively maximise the benefit of SBS's highly trusted and valued public-interest content and Charter-led services.



SBS notes that its accurate and trusted content available through social media is important in counterbalancing online misinformation and disinformation, including for the multilingual and First Nations audiences that SBS is specifically charged with serving.

SBS reiterates its previously raised concerns and suggestions which should be addressed by the platforms (or regulation)—including in relation to currently insufficient notification of upcoming changes; and improvement to moderation tools, particularly Facebook's.

SBS also notes that there are other important matters relevant to social media being separately addressed in ongoing inquiries and reviews, including the review of the Bargaining Code, in which SBS is an active participant.

SBS welcomes further engagement with the ACCC on these and relevant matters.

**Appendix A – Examples of Facebook moderation tools that should be improved**

Preferred functionality	Progress to date	Recommended tool enhancements
<p><b>Pre-moderation</b></p> <p>Ability to switch to pre-moderation, so page owners can go through a queue of unpublished comments and approve what goes live</p>	<p>Not provided by Facebook. Current workarounds are not ideal:</p> <ul style="list-style-type: none"> <li>• Some comment-filtering tools using automatic keyword-matching are available (for example, the Facebook Word Filter tool). This tool is not always reliable and is also resource intensive to use, as it requires manual preparation and execution on each social media page</li> <li>• This creates a resourcing issue as SBS has presence on multiple social media pages</li> <li>• The 'view all hidden comments' function on Facebook can only be applied to individual posts, and not applied at an aggregate level for all posts</li> <li>• It only applies after a post has been published and hidden, not before it is published</li> </ul>	<p>A centralised tool to view and pre-moderate a queue of unpublished comments across Facebook profiles managed by an organisation should be provided. Pre-moderation is already a standard feature of other platforms including YouTube and TikTok</p>
<p><b>Pre-set closing of user comments</b></p> <p>Ability to set a specified timeframe after publication, before the comments section of a post automatically closes/does not accept further comments</p>	<p>Not provided by Facebook. Current workarounds are suboptimal:</p> <ul style="list-style-type: none"> <li>• Page moderators can manually stop comments a certain time after a post</li> <li>• However, this process is resource intensive as it requires manual execution for each individual post (there is no centralised functionality to manage a group of posts)</li> </ul>	<ul style="list-style-type: none"> <li>• A centralised tool should be provided to set a specified timeframe after publication for users' comments and should apply to all posts, including boosted and advertised posts, and geographically controlled posts</li> <li>• Moderation should not impact the prominence of a post</li> </ul>

	<ul style="list-style-type: none"> <li>• This functionality is not extended to posts that are 'boosted', or advertised ('sponsored posts')</li> <li>• This functionality is not available for geographically controlled posts</li> <li>• Moderators need to consider whether these workarounds will reduce the reach of a post by causing it to be downranked</li> </ul>	
<b>Ability to moderate fragments of comments</b>	<p>Relevant functionality does not work consistently:</p> <ul style="list-style-type: none"> <li>• The Word Filter tool provides some 'smart filtering' (which detects variations of a given word that is to be hidden)</li> <li>• However, the filter does not work consistently and 'smart filtering' does not appear to always be effective for words in languages other than English</li> <li>• The filter can only be managed at the page level and cannot be managed centrally</li> </ul>	<ul style="list-style-type: none"> <li>• The Word Filter product should be further refined and improved, including in relation to words in languages other than English.</li> <li>• Centralised moderation functionality should be made available across Facebook pages managed by an organisation</li> </ul>
<b>Ability to pause live video comments</b>	<p>Moderation tools currently available for livestreamed videos are yet to be rolled out across all users; they appear to contain errors ('bugs'); and, do not include effective 'stop comments' functionality:</p> <ul style="list-style-type: none"> <li>• While the Live Producer tool provides a new set of moderation features, these cannot be accessed for any other type of post, and unlike on other types of posts comments cannot be switched off on Facebook Live videos</li> </ul>	<ul style="list-style-type: none"> <li>• The ability to pause or stop live video comments should be provided</li> <li>• Live Producer moderation tools should be consistently provided to all users</li> </ul>

- The Live Producer interface is not yet rolled out to all users
- In the past year, live video features (such as staggering posts from one user, limiting the length of a comment and limiting posts to followers of a page) have been inconsistently available