U.S. House of Representatives Committee on Energy and Commerce: Subcommittees on Communications & Technology and Consumer Protection & Commerce Hearing on "Fostering a Healthier Internet to Protect Consumers"

Testimony Submitted for the Record by Mr. Steve Huffman, Co-Founder & CEO of Reddit, Inc.

October 16, 2019

I. Introduction

Chairpersons, Ranking Members, Members of the Committee:

Thank you for inviting me. My name is Steve Huffman. I am the co-founder and CEO of Reddit, and I'm grateful for this opportunity to share why Section 230 is critical to our company. Reddit uses a different model of content moderation from our peers—one that empowers communities—and this model relies on Section 230. I'm here because even small changes to the law will have outsized consequences for our business, our communities, and what little competition remains in our industry.

II. What Reddit is and how we approach content moderation

My college roommate and I started Reddit in 2005 as a simple, user-powered forum to find news and interesting content. Since then, it's grown into a vast, community-driven site, where millions of people find not just news and a few laughs, but also support, new perspectives, and a real sense of belonging.

We don't think of Reddit as social media, because social media revolves around individuals, while we're organized around communities. These communities, which are centered upon everything from history and science to advice on relationships and parenting, are both created and moderated by users.

Our model has taken years to develop, with many hard lessons along the way. As some of you know, I left the company in 2009, and for a time Reddit lurched from crisis to crisis over the questions of moderation we're discussing today. In 2015, I came back because I realized the vast majority of our communities were providing an invaluable experience to our users, and Reddit needed a better approach to moderation.

A. Approach to Moderation

The way Reddit handles content moderation today is unique in the industry. We use a governance model akin to our own democracy—where everyone follows a set of rules, has the ability to vote and selforganize, and ultimately shares some responsibility for how the platform works.

B. Content Policy

First, we have our Content Policy, the fundamental rules everyone on Reddit must follow. We set them ourselves at the corporate level. Think of these as our federal laws. They are principles-based and include things most everyone can agree on, such as prohibitions on harassment, sharing sexual images without consent, encouraging violence, sharing people's private information, and other behaviors that have no place on our site.

C. Community Rules & Volunteer Moderators

Next, we have rules for what's allowed in each community—our state laws, if you will. These are written and enforced not by Reddit employees, but by the community's own volunteer moderators. These rules

¹ https://www.redditinc.com/policies/content-policy

are tailored to the unique needs of its members, and tend to be far more specific than the "federal" rules we set. For example, one community devoted to open dialogue between users with different perspectives has a set of rules roughly the length of the US Constitution. Volunteer community moderators are empowered to remove any post that does not follow the community rules, without any involvement or direction from Reddit, Inc. The self-moderation our users do every day at this community level is the most scalable solution we've seen to the challenges of moderating content online.

D. Upvotes & Downvotes

Each individual user plays a crucial role as well, voting up or down on every post and comment. Through this system of voting, users can accept or reject any piece of content. While most platforms have some version of the upvote function, an action to convey approval or agreement, we at Reddit see the additional downvote as equally important. The downvote is where community culture is made, through rejecting transgressive behavior or low-quality content. If any community member, not just a moderator, sees poor quality content, they may downvote it, and as people do so, it becomes less visible, and in the case of a comment, disappears from the default view of the community. Thus, Reddit's voting system essentially turns every user into a content moderator.

Additionally, accrued upvotes and downvotes feed into the posting user's reputation score, which we call "karma," which is publicly visible to all other users. It's an indicator of the constructiveness of a user's participation on Reddit, and it's possible for karma to be negative. Quantifying a user's reputation in this way incentivizes good behavior.

E. Moderation actions taken by Reddit, Inc.

While this user-led system generally works well, we recognize that we as a company still have responsibilities, and we proactively work to ensure communities stay within our rules. Any user may report violations directly to a specialized group of employees at Reddit known as our "Anti-Evil" Team. Their role is to enforce the rules against malicious users, or take down particularly egregious content violations. We can take action against individual users (for example, through account suspensions), or against entire communities. We try to be as transparent as possible when we take such actions, and we publish our content policy enforcement actions annually in our Transparency Report. Our decisions are also appealable, and we likewise publish the appeal intake and acceptance rate in the Transparency Report.² Owing to these practices, we are proud that we were the only company to earn a perfect six-star rating from the Electronic Frontier Foundation in their annual "Who Has Your Back?" report on tech company transparency.³

We also evolve our policies to ensure they keep up with reality. Since my return we've made a series of updates addressing violent content, deepfaked pornography, controlled goods, and harassment.

Nevertheless, like our democracy, the system isn't perfect, though its effectiveness has improved with our efforts. An independent scholarly analysis of our 2015 banning of communities that didn't abide by our policies showed these actions were largely effective in curbing bad behavior.⁴ And when we investigated Russian attempts at manipulating our platform in 2016, we found that, of all accounts that tried, less than 1% made it past the routine defenses of our content policy, community moderation, and simple downvotes from everyday users.⁵

⁴ http://comp.social.gatech.edu/papers/cscw18-chand-hate.pdf

² https://www.redditinc.com/policies/transparency-report-2018

³ https://www.eff.org/wp/who-has-your-back-2019

 $^{^{5}\ \}underline{https://www.reddit.com/r/announcements/comments/8bb85p/reddits_2017_transparency_report_and_suspect/$

While our model has improved the past few years, there is and will always be more to do and ways for us to improve, particularly as our communities grow and raise new and more complicated issues for us to solve. Section 230 is an instrumental tool in allowing us to do this work in good faith, without facing liability for it.

III. What does a world without 230 look like?

This all begs the question of what Reddit (and the internet economy at large) would look like without Section 230.

A. We wouldn't be able to moderate

First, all of the improvements in content moderation we've made over the past few years could not have happened, as these good-faith actions would expose us to liability. It's worth noting how much the Reddit of today looks like the Prodigy of the early 90s, which raised the case that delivered 230. Perversely, because Prodigy had moderators who removed egregious content, they were held liable for all content. At the same time, other services, notably CompuServe, who didn't make any attempts at moderating even the very worst content, were safe from legal consequences. This backwards incentive structure might have made sense in a pre-Internet age when publishers were dealing with much smaller amounts of content, but the sheer volume of content generated on internet platforms today means that all-or-nothing moderation simply isn't feasible. For example, on average Reddit handles more than 750,000 posts and 6.3 million comments per day across over 130,000 active communities.

B. Market competition considerations

There are also market considerations for 230 that are especially applicable to a smaller company like Reddit. Even targeted limits to 230 will create a regulatory burden on the entire industry, benefiting the largest companies by placing a significant cost on smaller competitors. While we have 500 employees and a sizable user base—normally more than enough to be considered a large company—in tech today we are an underdog compared to our nearest competitors, who are public companies 10 to 100 times our size.

Many of the conversations on revising 230 are premised on companies having the ability to moderate content from the center, in an industrialized model often reliant on armies of tens of thousands of contractors. Medium, small, and startup-sized companies don't have the resources for this. This approach has questionable utility anyway, since even tens of thousands of contractors don't scale with hundreds of millions of users, let alone billions. Indeed, the only thing that scales with users is users themselves, which is why we've empowered ours the way we have.

But to speak even more fundamentally about competition and startups, I think back to the early days of Reddit. Had we been liable for every piece of content on Reddit, we would have been immediately vulnerable to lawsuits. And statistically speaking, most of those cases would not have been about the serious harms we are all concerned with—illicit drug sales, terrorist propaganda, and other issues—but rather defamation, which is far and away the largest class of suits dismissed on 230 grounds. Indeed, it was a \$200 million defamation lawsuit that saddled Prodigy in the 230 origin story. We and others would be forced to defend against anyone with enough money to bankroll a lawsuit, no matter how frivolous, effectively enabling censorship through litigation.

C. Human considerations

Still, we recognize that there is truly harmful material on the internet, and we are committed to fighting it. But it's important to understand that rather than helping, even narrow changes to 230 can undermine the power of community, chill discussion, and hurt the vulnerable.

Take the opioid epidemic, which has been raised in discussions about 230. We have many communities on Reddit where users struggling with addiction can find support to help them on their way to sobriety.

Were there to be a carve-out in this area, hosting them may simply become too risky, forcing us to close them down. This would be a disservice to people who are struggling, yet this is exactly the type of decision that restrictions to 230 would force on us.

IV. Conclusion

Section 230 is a uniquely American law with a balanced approach that has allowed the internet and platforms like ours to flourish, while incentivizing good faith attempts to mitigate the unavoidable downsides of free expression. While these downsides are serious and demand the attention of both us in industry and you in Congress, they do not outweigh the overwhelming good that 230 has enabled.

Thank you, and I look forward to your questions.