

I am responding to the Board's request for public input based on my experience as a long-term Meta user and group administrator whose Facebook and Instagram accounts were permanently disabled without meaningful notice, explanation, or access to a functional appeal process. I am currently awaiting a response to a formal demand letter sent by legal counsel, a step that is neither accessible nor realistic for most affected users. For most users, meaningful review should not depend on financial resources, legal literacy, or legal representation. Procedural fairness must be available through ordinary platform mechanisms.

Due Process and Transparency

In the example of the Account Ban for Targeting Public Figures, the company documented specific violations, preserved evidence, and referred the case for independent review. That reflects meaningful due process. However, this level of transparency and review is not available to the vast majority of users. Most account disablements occur without citation of specific content, without access to strike histories, and without any meaningful opportunity to contest or correct alleged violations. These systemic deficiencies have been documented by civil society organizations such as People Over Platforms and by multiple investigative news reports.

Permanent disablement should be reserved for the most serious and clearly documented cases. Before imposing such a sanction, users should receive clear notice identifying specific content and timestamps, access to enforcement and strike records, guaranteed human review, a functional and timely appeal process, and meaningful opportunities for correction and rehabilitation. Sudden and unexplained account removal also carries significant emotional and psychological consequences, particularly for users who rely on these platforms for social connection, caregiving coordination, or community participation. These impacts reinforce the need for careful, transparent, and humane enforcement processes.

There is no principled justification for providing less due process to users caught by automated systems than to those accused of serious misconduct. Permanent disablement is an extreme sanction regardless of how it is triggered.

Proportional and Context-Aware Enforcement

Automated enforcement systems should account for a user's long-term history and overall contribution patterns. Long-standing, highly active users who produce large volumes of legitimate content are more likely to trigger occasional false positives than low-activity accounts.

Enforcement should consider factors such as account age, historical compliance, the proportion of flagged content relative to overall activity, and prior successful appeals. This would allow Meta to better distinguish persistent harmful behavior from incidental or misclassified content. For less serious or context-dependent cases, page and group administrators already have effective, proportionate tools — including moderation, warnings, and targeted removals — that often resolve issues without permanent, platform-wide sanctions. Preserving these layered responses helps prevent unnecessary escalation while protecting legitimate expression and community governance. As a long-time community moderator, I routinely use graduated measures such as temporary restrictions, comment limits, and time-outs to de-escalate conflicts. In most cases, these approaches resolve issues without

permanently removing individuals or erasing their participation history.

Renewable or time-limited restrictions are often more effective and humane than permanent bans, which can result in disproportionate and irreversible exclusion. Consistent with established governance principles, rehabilitation and correction should be prioritized over permanent removal except in the most serious cases.

Protection of Journalists and Public Figures

Where journalists, public figures, or private individuals are subjected to coordinated harassment, threats of violence, or targeted abuse, platforms have a responsibility to act swiftly and effectively.

In serious cases, particularly those involving credible threats, there should be coordinated engagement between Meta and appropriate law enforcement agencies to ensure public safety and accountability. Users with large followings or significant influence carry greater responsibility for the impact of their conduct. When influential accounts engage in sustained harassment or incitement, proportionate enforcement is justified to prevent real-world harm. At the same time, enforcement in these cases should remain transparent and evidence-based. Affected users should be informed of the specific content and conduct that led to sanctions, and decisions should be subject to meaningful human review. Strong protection for journalists and vulnerable individuals is compatible with due process. Both are necessary to maintain public trust and prevent misuse or overreach in enforcement systems.

I would also like to acknowledge that there are well-documented cases in which authorities have taken action to intimidate individuals for lawful speech on social media. In such situations, where Meta is not the reporting complainant, the platform has limited ability to prevent misuse of enforcement by external actors.

Unpaid Moderation and Community Governance

Facebook group administrators perform substantial unpaid moderation and community management work that directly supports platform safety, engagement, and retention. Meta derives substantial economic and reputational benefit from this unpaid labour, which supports platform safety, reduces moderation costs, and sustains user communities. Yet these contributors receive limited procedural protection in return. These volunteers help enforce policies, manage conflicts, and maintain healthy communities, often for many years. Despite this contribution, administrators are routinely affected by automated enforcement errors and can lose access without warning.

Long-standing and large-scale group administrators should be provided with priority access to human support and appeal channels based on group size, group longevity, and demonstrated compliance history.

Identity Verification and Fair Treatment

In my case, Meta required me to submit government-issued identification after my account was reported as fake, and I complied. Despite this verification, my accounts were later permanently disabled without explanation or meaningful review, undermining the purpose of the process and discouraging user cooperation.

Other users report being disabled immediately after submitting verification materials, often without human review, creating the perception that verification increases enforcement risk rather than providing protection. Although presented as a safeguard against fraud and inauthentic activity, identity verification does not reliably prevent erroneous enforcement and may instead trigger additional automated scrutiny. This creates a troubling contradiction: users are encouraged to share sensitive personal data in good faith, yet receive no corresponding procedural protection. When verification fails to trigger careful review and instead leads to irreversible automated penalties, it undermines trust, discourages cooperation, and raises serious concerns about fairness and accountability. If verification is required, it should serve as a basis for heightened due process and human oversight, not as another input into opaque enforcement systems.

Serious Threats and Law Enforcement

Where content involves credible threats of violence or serious criminal behavior, appropriate referral to law enforcement should be considered. Such referrals should be limited to cases involving clear, imminent, and substantiated risk, and should not be used to suppress lawful but controversial speech. If conduct is dangerous enough to justify permanent removal, it should also warrant formal investigation. Permanent erasure without explanation neither protects the public nor provides accountability. A transparent threshold for referral would help prevent over-policing and safeguard freedom of expression while ensuring genuine threats are addressed.

Context, Nuance, and Human Review

Threats and harassment against public figures and journalists, particularly women, deserve strong enforcement. However, automated systems struggle with nuance, quotation, satire, and contextual discussion. Automated systems also have limited capacity to interpret off-platform context, historical relationships, or intent. Users should be informed when off-platform factors influence enforcement and be given meaningful opportunities to respond. Over-reliance on automation in sensitive speech contexts risks chilling legitimate discourse and discouraging civic participation. Enforcement systems must distinguish between abuse, criticism, debate, and protected expression.

Human review should be mandatory in high-impact cases to ensure lawful expression is not wrongly suppressed.

Data Access and Preservation

At minimum, permanently disabled accounts containing personal archives and records should be placed in a restricted, view-only state that allows full data download. Many users currently lose access to irreplaceable personal and professional data without warning, and existing download tools often exclude photos, comments, group content, administrative materials, and interaction histories, leaving users without meaningful access to their own records.

When an account is disabled, Meta frequently removes not only the user's content but also entire discussion threads and interactions involving other legitimate users. Because content is deleted rather than anonymized or labeled (for example, "[User Disabled]"), the contributions and contextual responses of other community members are erased.

I experienced this directly as a group administrator, when the loss of my account erased years of shared infrastructure, banners, and reference materials.

This causes unnecessary collateral harm by destroying discussion histories, undermining group continuity, and penalizing uninvolved users. Other platforms preserve discussion integrity by anonymizing removed accounts while retaining surrounding content. Meta should adopt similar practices. Enforcement should be targeted and proportionate, and should not result in the mass deletion of unrelated, compliant content.

Transparency and Reporting

Meta should provide clearer, standardized reporting to the Oversight Board on automated enforcement error rates, appeal outcomes, response times, and reinstatement rates. At minimum, this information should be made available to the Board to enable meaningful oversight, accountability, and evidence-based policy recommendations. Transparency is essential to maintaining public trust in platform governance. Such reporting should be disaggregated by enforcement type, automation level, and user tenure, to enable meaningful assessment of systemic risks and disparities.

Voluntary Verification and Prevention

Meta should offer robust, free, and voluntary identity verification for users who want an added layer of account protection, subject to strict limits on data collection, security, and retention.

While verified users are more likely to invest responsibly in their communities and comply with platform policies, verification must remain optional to protect those who rely on anonymity for safety, political expression, or protection from harassment.

Verification should function as a safeguard, not a risk factor. Many users report being permanently disabled after submitting government ID or biometric verification without meaningful human review.

Verification should therefore trigger enhanced procedural protections, including guaranteed human review and transparent decision-making, rather than additional automated enforcement. Without these safeguards, verification discourages cooperation, increases privacy risk without clear benefit, and undermines trust in platform governance.

Safeguards Against Repeat Errors

In cases where accounts are reinstated after review, Meta should implement safeguards to prevent repeated erroneous enforcement. No account should be permanently disabled based solely on automated assessment. Automation may assist in detection, but final decisions involving irreversible sanctions must involve accountable human judgment.

Without such measures, users may be restored only to face the same opaque enforcement again. Repeat erroneous enforcement undermines confidence in corrective mechanisms and discourages users from engaging with appeal systems in good faith.

Account Security and Breach Detection

Many users — especially seniors, people with disabilities, and non-technical users — are highly vulnerable to account compromise through phishing, malware, and credential theft. When hacked, they often lack the knowledge to diagnose the breach or navigate complex recovery systems. For elderly or isolated users, losing account access can mean sudden disconnection from family, caregivers, and support networks, with serious emotional and practical consequences.

Some users also rely on trusted family members or designated helpers for legitimate technical support and accessibility assistance. These relationships should not be misclassified as suspicious. Meta could support this through optional, transparent delegated-access settings that allow users to formally designate trusted helpers. Related login patterns should then be evaluated in context rather than treated automatically as wrongdoing.

In cases of suspected compromise, permanent disablement punishes victims of cybercrime instead of addressing underlying security failures. It severs social ties and isolates users who depend on these platforms for support.

Meta should therefore prioritize protection and recovery over removal. This includes proactively identifying compromise using its own device and login data, recognizing authorized helpers, securing and reviewing affected accounts rather than disabling them, requiring enhanced security measures such as 2FA after breaches, and providing clear notification and recovery guidance. This approach would improve platform safety while preventing unnecessary harm to vulnerable users.

I respectfully urge the Board to recommend binding standards requiring clear disclosure of alleged violations and strike histories; functional, time-bound appeals with safeguards against repeat errors; and guaranteed human review with documented reasoning before any permanent disablement. Meta should preserve and provide access to complete user data, implement proportional and graduated enforcement with rehabilitation pathways and appropriate referral for credible threats, and offer voluntary verification with enhanced due process protections. Priority review should be available for long-standing users and community administrators. The Board should also require mandatory breach-detection and recovery protocols, comprehensive data retention and anonymization standards to protect third-party contributions, and independent audits of high-impact automated systems, with public reporting on error rates, appeals, and systemic risks to ensure transparency and trust.

As Meta's platforms have become central infrastructure for social connection, commerce, and community governance, they now function in many respects as essential digital utilities. Through network effects, market dominance, and data concentration, Meta has become a gatekeeper to social participation and economic opportunity for millions. When access to these systems determines people's ability to participate in social, economic, and civic life, procedural safeguards, transparency, and proportional enforcement are not optional — they are fundamental responsibilities. These protections must apply consistently to all users, not only to a few high-profile cases. With such influence comes a corresponding duty of care, accountability, and respect for basic principles of fairness. Failure to uphold these standards risks turning automated enforcement from a safety tool into a source of systemic injustice and social harm.