



August 25, 2016

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Notice of Ex Parte Communication, MB Docket Nos. 14-50, 09-182, 07-294

Dear Ms. Dortch:

Today, the Federal Communications Commission (FCC) released its 2010 and 2014 Quadrennial Review Report and Order.¹ In the combined Order, the Commission claims that it has retained (and in fact, ratcheted up) the same rules that have been in place for decades – all in the name of “promot[ing] competition and a diversity of viewpoints in local markets, thereby enriching local communities through the promotion of distinct and antagonistic voices.”² Despite its soaring self-assessment, in one short sentence, the Commission betrays an ignorance that will threaten the continued existence of the very diversity of local media voices it purports to champion:

While we recognize the popularity of video programming delivered via MVPDs, the Internet, and mobile devices, we find that competition from such video programming providers remains of *limited relevance* for the purposes of our analysis.³

Whether for lack of effort or care, the Commission hastily dismisses the rise of three of the most important sources of programming and news relied on by today’s consumers in order to justify maintaining archaic rules like the printed newspaper cross-ownership ban and the local TV ownership rule.

¹ 2014 Quadrennial Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, Second Report and Order, MB Docket No. 14-50, et. al., FCC 16-107 (Aug. 25, 2016) (Order).

² *Id.* at ¶ 3.

³ *Id.* at ¶ 27 (emphasis added).

1771 N Street NW
Washington DC 20036 2800
Phone 202 429 5300

The Commission's belief that the Internet and social media are irrelevant is strikingly out-of-touch and belittles the role these platforms have played in nearly every major news story of the last several years. It flies in the face of countless studies, reports and, ironically, newspaper articles that show the increasingly influential effect of the Internet and social media on information flow. In just the latest example of this, the New York Times yesterday posted an online article, the print version of which will be published this weekend, titled: "Inside Facebook's (Totally Insane, Unintentionally Gigantic, Hyperpartisan) Political-Media Machine: How a strange new class of media outlet has arisen to take over our news feeds." A copy is attached to this letter.⁴

The article offers a stark contrast to the Commission's firmly entrenched beliefs that the Internet and social media are immaterial. For example, it notes:

Facebook, in the years leading up to this election, hasn't just become nearly ubiquitous among American internet users; it has centralized online news consumption in an unprecedented way. According to the company, its site is used by more than 200 million people in the United States each month, out of a total population of 320 million. . . There are news sources that essentially do not exist outside of Facebook, and you've probably never heard of them. They have names like Occupy Democrats; The Angry Patriot; US Chronical; Addicting Info; RightAlerts; Being Liberal; Opposing Views; Fed-Up Americans; American News; and hundreds more. Some of these pages have millions of followers; many have hundreds of thousands.⁵

The articles goes on to say that, collectively, these "Facebook-native" news sources reach tens of millions of people, and "rival the reach of their better-funded counterparts in the political media, whether corporate giants like CNN or The New York Times, or openly ideological web operations like Breitbart or Mic."⁶ By purposefully ignoring these developments – and the likelihood that these trends will continue – the Commission today demonstrated the extent to which it refuses to accept or even acknowledge how much the modern media market has been fundamentally altered by the Internet.

Unfortunately for the American people, the Commission's willful ignorance will not only continue to harm local broadcasters and newspapers uniquely, but also inhibit investment in news production. Legacy news sources, which the Commission purports to hold in such high esteem, will continue to compete at a disadvantage in a world that the Commission fails to understand for at least another four years before having an opportunity to demonstrate what everyone (except the FCC, apparently) already knows: the Internet and social media have

⁴ John Herrman, Inside Facebook's (Totally Insane, Unintentionally Gigantic, Hyperpartisan) Political-Media Machine: How a strange new class of media outlet has arisen to take over our news feeds," New York Times (Aug. 24, 2016) available at <http://www.nytimes.com/2016/08/28/magazine/inside-facebooks-totally-insane-unintentionally-gigantic-hyperpartisan-political-media-machine.html?hp&action=click&pgtype=Homepage&clickSource=story-heading&module=first-column-region®ion=top-news&WT.nav=top-news&r=0>.

⁵ *Id.*

⁶ *Id.*

transformed the information landscape. What is unclear is which sources of local news will remain when that time comes.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rick Kaplan", with a long horizontal flourish extending to the right.

Rick Kaplan
General Counsel and Executive Vice President
Legal and Regulatory Affairs
National Association of Broadcasters

Inside Facebook's (Totally Insane, Unintentionally Gigantic, Hyperpartisan) Political-Media Machine

How a strange new class of media outlet has arisen to take over our news feeds.

By JOHN HERRMAN AUG. 24, 2016

Open your Facebook feed. What do you see? A photo of a close friend's child. An automatically generated slide show commemorating six years of friendship between two acquaintances. An eerily on-target ad for something you've been meaning to buy. A funny video. A sad video. A recently live video. Lots of video; more video than you remember from before. A somewhat less-on-target ad. Someone you saw yesterday feeling blessed. Someone you haven't seen in 10 years feeling worried.

And then: A family member who loves politics asking, "Is this really who we want to be president?" A co-worker, whom you've never heard talk about politics, asking the same about a different candidate. A story about Donald Trump that "just can't be true" in a figurative sense. A story about Donald Trump that "just can't be true" in a literal sense. A video of Bernie Sanders speaking, overlaid with text, shared from a source you've never seen before, viewed 15 million times. An article questioning Hillary Clinton's honesty; a headline questioning Donald Trump's sanity. A few shares that go a bit too far: headlines you would never pass along yourself but that you might tap, read and probably not forget.

Maybe you've noticed your feed becoming bluer; maybe you've felt it becoming redder. Either way, in the last year, it has almost certainly become more intense. You've seen a lot of media sources you don't recognize and a lot of posts bearing no

memorable brand at all. You've seen politicians and celebrities and corporations weigh in directly; you've probably seen posts from the candidates themselves. You've seen people you're close to and people you're not, with increasing levels of urgency, declare it is now time to speak up, to take a stand, to set aside allegiances or hangups or political correctness or hate.

Facebook, in the years leading up to this election, hasn't just become nearly ubiquitous among American internet users; it has centralized online news consumption in an unprecedented way. According to the company, its site is used by more than 200 million people in the United States each month, out of a total population of 320 million. A 2016 Pew study found that 44 percent of Americans read or watch news on Facebook. These are approximate exterior dimensions and can tell us only so much. But we can know, based on these facts alone, that Facebook is hosting a huge portion of the political conversation in America.

The Facebook product, to users in 2016, is familiar yet subtly expansive. Its algorithms have their pick of text, photos and video produced and posted by established media organizations large and small, local and national, openly partisan or nominally unbiased. But there's also a new and distinctive sort of operation that has become hard to miss: political news and advocacy pages made specifically for Facebook, uniquely positioned and cleverly engineered to reach audiences exclusively in the context of the news feed. These are news sources that essentially do not exist outside of Facebook, and you've probably never heard of them. They have names like Occupy Democrats; The Angry Patriot; US Chronicle; Addicting Info; RightAlerts; Being Liberal; Opposing Views; Fed-Up Americans; American News; and hundreds more. Some of these pages have millions of followers; many have hundreds of thousands.

Using a tool called CrowdTangle, which tracks engagement for Facebook pages across the network, you can see which pages are most shared, liked and commented on, and which pages dominate the conversation around election topics. Using this data, I was able to speak to a wide array of the activists and entrepreneurs, advocates and opportunists, reporters and hobbyists who together make up 2016's most disruptive, and least understood, force in media.

Individually, these pages have meaningful audiences, but cumulatively, their audience is gigantic: tens of millions of people. On Facebook, they rival the reach of their better-funded counterparts in the political media, whether corporate giants like CNN or The New York Times, or openly ideological web operations like Breitbart or Mic. And unlike traditional media organizations, which have spent years trying to figure out how to lure readers out of the Facebook ecosystem and onto their sites, these new publishers are happy to live inside the world that Facebook has created. Their pages are accommodated but not actively courted by the company and are not a major part of its public messaging about media. But they are, perhaps, the purest expression of Facebook's design and of the incentives coded into its algorithm — a system that has already reshaped the web and has now inherited, for better or for worse, a great deal of America's political discourse.

In 2006, when Mark Zuckerberg dropped out of college to run his rapidly expanding start-up, Mark Provost was a student at Rogers State University in Claremore, Okla., and going through a rough patch. He had transferred restlessly between schools, and he was taking his time to graduate; a stock-picking hobby that grew into a promising source of income had fallen apart. His outlook was further darkened by the financial crisis and by the years of personal unemployment that followed. When the Occupy movement began, he quickly got on board. It was only then, when Facebook was closing in on its billionth user, that he joined the network.

Now 36, Provost helps run US Uncut, a left-leaning Facebook page and website with more than 1.5 million followers, about as many as MSNBC has, from his apartment in Philadelphia. (Sample headlines: “Bernie Delegates Want You to See This DNC Scheme to Silence Them” and “This Sanders Delegate Unleashing on Hillary Clinton Is Going Absolutely Viral.”) He frequently contributes to another popular page, The Other 98%, which has more than 2.7 million followers.

Occupy got him on Facebook, but it was the 2012 election that showed him its potential. As he saw it, that election was defined by social media. He mentioned a set of political memes that now feel generationally distant: Clint Eastwood's empty chair at the 2012 Republican National Convention and Mitt Romney's debate gaffe about “binders full of women.” He thought it was a bit silly, but he saw in these viral moments a language in which activists like him could spread their message.

Provost's page now communicates frequently in memes, images with overlaid text. "May I suggest," began one, posted in May 2015, when opposition to the Trans-Pacific Partnership was gaining traction, "the first 535 jobs we ship overseas?" Behind the text was a photo of Congress. Many are more earnest. In an image posted shortly thereafter, a photo of Bernie Sanders was overlaid with a quote: "If Germany, Denmark, Sweden and many more provide tuition-free college," read the setup, before declaring in larger text, "we should be doing the same." It has been shared more than 84,000 times and liked 75,000 more. Not infrequently, this level of zeal can cross into wishful thinking. A post headlined "Did Hillary Clinton Just Admit on LIVE TV That Her Iraq War Vote Was a Bribe?" was shared widely enough to merit a response from Snopes, which called it "quite a stretch."

This year, political content has become more popular all across the platform: on homegrown Facebook pages, through media companies with a growing Facebook presence and through the sharing habits of users in general. But truly Facebook-native political pages have begun to create and refine a new approach to political news: cherry-picking and reconstituting the most effective tactics and tropes from activism, advocacy and journalism into a potent new mixture. This strange new class of media organization slots seamlessly into the news feed and is especially notable in what it asks, or doesn't ask, of its readers. The point is not to get them to click on more stories or to engage further with a brand. The point is to get them to share the post that's right in front of them. Everything else is secondary.

While web publishers have struggled to figure out how to take advantage of Facebook's audience, these pages have thrived. Unburdened of any allegiance to old forms of news media and the practice, or performance, of any sort of ideological balance, native Facebook page publishers have a freedom that more traditional publishers don't: to engage with Facebook purely on its terms. These are professional Facebook users straining to build media companies, in other words, not the other way around.

From a user's point of view, every share, like or comment is both an act of speech and an accretive piece of a public identity. Maybe some people want to be identified among their networks as news junkies, news curators or as some sort of objective and well-informed reader. Many more people simply want to share specific

beliefs, to tell people what they think or, just as important, what they don't. A newspaper-style story or a dry, matter-of-fact headline is adequate for this purpose. But even better is a headline, or meme, that skips straight to an ideological conclusion or rebuts an argument.

Rafael Rivero is an acquaintance of Provost's who, with his twin brother, Omar, runs a page called Occupy Democrats, which passed three million followers in June. This accelerating growth is attributed by Rivero, and by nearly every left-leaning page operator I spoke with, not just to interest in the election but especially to one campaign in particular: "Bernie Sanders is the Facebook candidate," Rivero says. The rise of Occupy Democrats essentially mirrored the rise of Sanders's primary run. On his page, Rivero started quoting text from Sanders's frequent email blasts, turning them into Facebook-ready memes with a consistent aesthetic: colors that pop, yellow on black. Rivero says that it's clear what his audience wants. "I've probably made 10,000 graphics, and it's like running 10,000 focus groups," he said. (Clinton was and is, of course, widely discussed by Facebook users: According to the company, in the last month 40.8 million people "generated interactions" around the candidate. But Rivero says that in the especially engaged, largely oppositional left-wing-page ecosystem, Clinton's message and cautious brand didn't carry.)

Because the Sanders campaign has come to an end, these sites have been left in a peculiar position, having lost their unifying figure as well as their largest source of engagement. Audiences grow quickly on Facebook but can disappear even more quickly; in the case of left-leaning pages, many had accumulated followings not just by speaking to Sanders supporters but also by being intensely critical, and often utterly dismissive, of Clinton.

Now that the nomination contest is over, Rivero has turned to making anti-Trump content. A post from earlier this month got straight to the point: "Donald Trump is unqualified, unstable and unfit to lead. Share if you agree!" More than 40,000 people did.

"It's like a meme war," Rivero says, "and politics is being won and lost on social media."

In retrospect, Facebook's takeover of online media looks rather like a slow-motion coup. Before social media, web publishers could draw an audience one of two ways: through a dedicated readership visiting its home page or through search engines. By 2009, this had started to change. Facebook had more than 300 million users, primarily accessing the service through desktop browsers, and publishers soon learned that a widely shared link could produce substantial traffic. In 2010, Facebook released widgets that publishers could embed on their sites, reminding readers to share, and these tools were widely deployed. By late 2012, when Facebook passed a billion users, referrals from the social network were sending visitors to publishers' websites at rates sometimes comparable to Google, the web's previous de facto distribution hub. Publishers took note of what worked on Facebook and adjusted accordingly.

This was, for most news organizations, a boon. The flood of visitors aligned with two core goals of most media companies: to reach people and to make money. But as Facebook's growth continued, its influence was intensified by broader trends in internet use, primarily the use of smartphones, on which Facebook became more deeply enmeshed with users' daily routines. Soon, it became clear that Facebook wasn't just a source of readership; it was, increasingly, where readers lived.

Facebook, from a publisher's perspective, had seized the web's means of distribution by popular demand. A new reality set in, as a social-media network became an intermediary between publishers and their audiences. For media companies, the ability to reach an audience is fundamentally altered, made greater in some ways and in others more challenging. For a dedicated Facebook user, a vast array of sources, spanning multiple media and industries, is now processed through the same interface and sorting mechanism, alongside updates from friends, family, brands and celebrities.

From the start, some publishers cautiously regarded Facebook as a resource to be used only to the extent that it supported their existing businesses, wary of giving away more than they might get back. Others embraced it more fully, entering into formal partnerships for revenue sharing and video production, as The New York Times has done. Some new-media start-ups, most notably BuzzFeed, have pursued a comprehensively Facebook-centric production-and-distribution strategy. All have

eventually run up against the same reality: A company that can claim nearly every internet-using adult as a user is less a partner than a context — a self-contained marketplace to which you have been granted access but which functions according to rules and incentives that you cannot control.

The news feed is designed, in Facebook's public messaging, to "show people the stories most relevant to them" and ranks stories "so that what's most important to each person shows up highest in their news feeds." It is a framework built around personal connections and sharing, where value is both expressed and conferred through the concept of engagement. Of course, engagement, in one form or another, is what media businesses have always sought, and provocation has always sold news. But now the incentives are literalized in buttons and written into software.

Any sufficiently complex system will generate a wide variety of results, some expected, some not; some desired, others less so. On July 31, a Facebook page called Make America Great posted its final story of the day. "No Media Is Telling You About the Muslim Who Attacked Donald Trump, So We Will ...," read the headline, next to a small avatar of a pointing and yelling Trump. The story was accompanied by a photo of Khizr Khan, the father of a slain American soldier. Khan spoke a few days earlier at the Democratic National Convention, delivering a searing speech admonishing Trump for his comments about Muslims. Khan, pocket Constitution in hand, was juxtaposed with the logo of the Muslim Brotherhood in Egypt. "It is a sad day in America," the caption read, "where we the people must expose the TRUTH because the media is in the tank for 1 Presidential Candidate!"

Readers who clicked through to the story were led to an external website, called Make America Great Today, where they were presented with a brief write-up blended almost seamlessly into a solid wall of fleshy ads. Khan, the story said — between ads for "(1) Odd Trick to 'Kill' Herpes Virus for Good" and "22 Tank Tops That Aren't Covering Anything" — is an agent of the Muslim Brotherhood and a "promoter of Islamic Shariah law." His late son, the story suggests, could have been a "Muslim martyr" working as a double agent. A credit link beneath the story led to a similar-looking site called Conservative Post, from which the story's text was pulled verbatim. Conservative Post had apparently sourced its story from a longer post on a right-wing site called Shoebat.com.

Within 24 hours, the post was shared more than 3,500 times, collecting a further 3,000 reactions — thumbs-up likes, frowning emoji, angry emoji — as well as 850 comments, many lengthy and virtually all impassioned. A modest success. Each day, according to Facebook's analytics, posts from the Make America Great page are seen by 600,000 to 1.7 million people. In July, articles posted to the page, which has about 450,000 followers, were shared, commented on or liked more than four million times, edging out, for example, the Facebook page of USA Today.

Make America Great, which inhabits the fuzzy margins of the political Facebook page ecosystem, is owned and operated by a 35-year-old online marketer named Adam Nicoloff. He started the page in August 2015 and runs it from his home outside St. Louis. Previously, Nicoloff provided web services and marketing help for local businesses; before that, he worked in restaurants. Today he has shifted his focus to Facebook pages and websites that he administers himself. Make America Great was his first foray into political pages, and it quickly became the most successful in a portfolio that includes men's lifestyle and parenting.

Nicoloff's business model is not dissimilar from the way most publishers use Facebook: build a big following, post links to articles on an outside website covered in ads and then hope the math works out in your favor. For many, it doesn't: Content is expensive, traffic is unpredictable and website ads are both cheap and alienating to readers. But as with most of these Facebook-native pages, Nicoloff's content costs comparatively little, and the sheer level of interest in Trump and in the type of inflammatory populist rhetoric he embraces has helped tip Nicoloff's system of advertising arbitrage into serious profitability. In July, visitors arriving to Nicoloff's website produced a little more than \$30,000 in revenue. His costs, he said, total around \$8,000, partly split between website hosting fees and advertising buys on Facebook itself.

Then, of course, there's the content, which, at a few dozen posts a day, Nicoloff is far too busy to produce himself. "I have two people in the Philippines who post for me," Nicoloff said, "a husband-and-wife combo." From 9 a.m. Eastern time to midnight, the contractors scour the internet for viral political stories, many explicitly pro-Trump. If something seems to be going viral elsewhere, it is copied to their site and promoted with an urgent headline. (The Khan story was posted at the end of the

shift, near midnight Eastern time, or just before noon in Manila.) The resulting product is raw and frequently jarring, even by the standards of this campaign. “There’s No Way I’ll Send My Kids to Public School to Be Brainwashed by the LGBT Lobby,” read one headline, linking to an essay ripped from Glenn Beck’s *The Blaze*; “Alert: UN Backs Secret Obama Takeover of Police; Here’s What We Know ...,” read another, copied from a site called *The Federalist Papers Project*. In the end, Nicoloff takes home what he jokingly described as a “doctor’s salary” — in a good month, more than \$20,000.

Terry Littlepage, an internet marketer based in Las Cruces, N.M., has taken this model even further. He runs a collection of about 50 politically themed Facebook pages with names like *The American Patriot* and *My Favorite Gun*, which push visitors to a half-dozen external websites, stocked with content aggregated by a team of freelancers. He estimates that he spends about a thousand dollars a day advertising his pages on Facebook; as a result, they have more than 10 million followers. In a good month, Littlepage’s properties bring in \$60,000.

Nicoloff and Littlepage say that Trump has been good for business, but each admits to some discomfort. Nicoloff, a conservative, says that there were other candidates he preferred during the Republican primaries but that he had come around to the nominee. Littlepage is also a recent convert. During the primaries, he was a Cruz supporter, and he even tried making some left-wing pages on Facebook but discovered that they just didn’t make him as much money.

In their angry, cascading comment threads, *Make America Great*’s followers express no such ambivalence. Nearly every page operator I spoke to was astonished by the tone their commenters took, comparing them to things like torch-wielding mobs and sharks in a feeding frenzy. No doubt because of the page’s name, some Trump supporters even mistake Nicoloff’s page for an official organ of the campaign. Nicoloff says that he receives dozens of messages a day from Trump supporters, expecting or hoping to reach the man himself. Many, he says, are simply asking for money.

Many of these political news pages will likely find their cachet begin to evaporate after Nov. 8. But one company, the *Liberty Alliance*, may have found a

way to create something sustainable and even potentially transformational, almost entirely within the ecosystem of Facebook. The Georgia-based firm was founded by Brandon Vallorani, formerly of Answers in Genesis, the organization that opened a museum in Kentucky promoting a literal biblical creation narrative. Today the Liberty Alliance has around 100 sites in its network, and about 150 Facebook pages, according to Onan Coca, the company's 36-year-old editor in chief. He estimates their cumulative follower count to be at least 50 million. Among the company's partners are the former congressman Allen West, the 2008 election personality Joe the Plumber, the conservative actor Kirk Cameron and the former "Saturday Night Live" cast member Victoria Jackson. Then there are Liberty's countless news-oriented pages, which together have become an almost ubiquitous presence on right-leaning political Facebook in the last few years. Their names are instructive and evocative: Eagle Rising; Fighting for Trump; Patriot Tribune; Revive America; US Herald; The Last Resistance.

A dozen or so of the sites are published in-house, but posts from the company's small team of writers are free to be shared among the entire network. The deal for a would-be Liberty Alliance member is this: You bring the name and the audience, and the company will build you a prefab site, furnish it with ads, help you fill it with content and keep a cut of the revenue. Coca told me the company brought in \$12 million in revenue last year. (The company declined to share documentation further corroborating his claims about followers and revenue.)

Because the pages are run independently, the editorial product is varied. But it is almost universally tuned to the cadences and styles that seem to work best on partisan Facebook. It also tracks closely to conservative Facebook media's big narratives, which, in turn, track with the Trump campaign's messaging: Hillary Clinton is a crook and possibly mentally unfit; ISIS is winning; Black Lives Matter is the real racist movement; Donald Trump alone can save us; the system — all of it — is rigged. Whether the Liberty Alliance succeeds or fails will depend, at least in part, on Facebook's algorithm. Systemic changes to the ecosystem arrive through algorithmic adjustments, and the company recently adjusted the news feed to "further reduce clickbait headlines."

For now, the network hums along, mostly beneath the surface. A post from a Liberty Alliance page might find its way in front of a left-leaning user who might disagree with it or find it offensive, and who might choose to engage with the friend who posted it directly. But otherwise, such news exists primarily within the feeds of the already converted, its authorship obscured, its provenance unclear, its veracity questionable. It's an environment that's at best indifferent and at worst hostile to traditional media brands; but for this new breed of page operator, it's mostly upside. In front of largely hidden and utterly sympathetic audiences, incredible narratives can take shape, before emerging, mostly formed, into the national discourse.

Consider the trajectory of a post from August, from a Facebook page called Patriotic Folks, the headline of which read, "Spread This: Media Rigging the Polls, Hiding New Evidence Proving Trump Is Winning." The article cited a litany of social-media statistics highlighting Trump's superior engagement numbers, among them Trump's Facebook following, which is nearly twice as large as Clinton's. "Don't listen to the lying media — the only legitimate attack they have left is Trump's poll numbers," it said. "Social media proves the GOP nominee has strong foundation and a firm backing." The story spread across this right-wing Facebook ecosystem, eventually finding its way to Breitbart and finally to Sean Hannity's "Morning Minute," where he read through the statistics to his audience.

Before Hannity signed off, he posed a question: "So, does that mean anything?" It's a version of the question that everyone wants to answer about Facebook and politics, which is whether the site's churning political warfare is actually changing minds — or, for that matter, beginning to change the political discourse as a whole. How much of what happens on the platform is a reflection of a political mood and widely held beliefs, simply captured in a new medium, and how much of it might be created, or intensified, by the environment it provides? What is Facebook doing to our politics?

Appropriately, the answer to this question can be chosen and shared on Facebook in whichever way you prefer. You might share this story from The New York Times Magazine, wondering aloud to your friends whether our democracy has been fundamentally altered by this publishing-and-advertising platform of unprecedented scale. Or you might just relax and find some memes to share from

one of countless pages that will let you air your political id. But for the page operators, the question is irrelevant to the task at hand. Facebook's primacy is a foregone conclusion, and the question of Facebook's relationship to political discourse is absurd — they're one and the same. As Rafael Rivero put it to me, "Facebook is where it's all happening."

John Herrman is a David Carr fellow at The New York Times.

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