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CHAPTER 6
Challenging Diversity—Social Media Platforms and a New Conception of Media Diversity
NATALI HELBERGER

INTRODUCTION

It is 2040.1 The morning alarm goes, and wakes me with a careful selection of MindBook headlines. Not too negative, since the radio app knows that I am not exactly a morning person, and that bad news in the morning will negatively affect my socializability and productivity. In the bathroom, my smart mirror treats me to some compliments, and a well-balanced mix of news about health and lifestyle products, and recent tech-developments to slowly prepare me for another day at the faculty. After the first cup of coffee, MindBook considers the time ripe to present me with the more serious kinds of headlines— a new oil conflict in Antarctica, the election campaign in the United States is again in full swing, Turkey is in negotiations with Russia over Cyprus. I smile: my extra minutes on MindBook last night were well invested. Having spent half an hour clicking very purposefully on all the news about external relations, politics, and oil prices seemed to have helped me get out of this news-about-climate-crisis-and-smart-cities loop I was stuck in for the better half of last week. Admittedly, it did help

1. The author would like to thank the editors for their thoughtful feedback and a stimulating discussion.
me a lot to prepare my presentation at the Ministry for Education, Culture and Science yesterday. And yet, sometimes I wish that getting the news was a little less efficient. Since the decline of the general news media 30 years ago, getting the bigger picture has become more difficult.

Futuristic? A bit, but not excessively so. The way we find and receive news content is changing. Not rapidly but steadily. One key trend seems to be the fact that people access news content and media content more and more not only via traditional media but also via new information intermediaries, such as social media platforms, apps, and search engines (Reuters Institute for the Study of Journalism 2016, 2017; Pew Research Center 2016). These information intermediaries have stepped in to fill a critical gap in the news delivery chain: channeling attention and helping users to make a selection of the news that they find relevant. Information intermediaries often do not produce news themselves, neither do they see themselves as editors or as having the mission of providing citizens with a diverse set of information that we need in order to make informed choices. Rather, their business model is geared toward distributing news, connecting single articles with audiences, and realizing the advertising potential of different kinds of media content and target groups. And with the advances of data analytics and the increasing stock of data and intelligence about user preferences and interests, news has turned into a customizable product that can be carefully targeted and adjusted to individual recipients and the demands of advertisers. The presence of such data-driven, heavily targeted information intermediaries does not necessarily need to be a challenge to a diverse information environment, as long as there are alternative sources of information. But what to make of a situation in which there remain only one or a few dominant sources of information (as in the example of the fictional MindBook in the introductory scenario above)? And in the light of such a dominant player and a heavily targeted news environment, what are the prospects of still encountering diverse media content?

The focus of my chapter is on one of the central public policy objectives in media policy: media diversity. I do not discuss other, equally important issues of platform dominance, such as the role of platforms in politics, their economic impact, and so forth, confident that many of those issues are covered by other chapters. Media diversity as a concept is deeply ingrained in our thinking about the role and contribution of the media in a democratic society and the idea that there shall be no one entity that can control (or dominate) the public debate. Instead, the media shall reflect the interests and needs of a heterogeneous society. In such a society, all voices have at least in principle the opportunity to make themselves heard. There is broad agreement that, as the Council of Europe has put it, "media pluralism and diversity of media content are essential for the functioning of a democratic society" and that "the demands . . . from Article 10 of the Convention for the Protection of Human Rights and Fundamental Freedoms [right to freedom of expression] will be fully satisfied only if each person is given the possibility to form his or her own opinion from diverse sources of information" (Council of Europe 2007).

The close link between media diversity and democratic participation may also explain the vigor with which the rise of platforms and their growing influence in and on the media landscape are being met. The impact of their personalized recommendations and algorithmic filtering on users’ information diet is subject to much concern and dystopian visions about filter bubbles and information bias but also targeted exclusion from news access. Depending on people’s personal profile, users will get to see some kinds of information more, and others less or not at all. With the growing importance of a few large information intermediaries as sometimes the main source of information (Reuter 2017), the need to grasp the dynamics of these more centralized, data-driven (instead of editorially driven) news distribution models is ever more urgent. There is a general feeling of unease about the growing power and impact of platforms on users’ media diets and yet, as Martin Moore aptly observed, it is not "[u]ntil we better understand and communicate the dilemmas they raise" that we will be able to find the effective policy responses (Moore 2016).

Regulators and policymakers across Europe are grappling with the question of what exactly the nature of these dilemmas is. Or to speak in the words of the British regulator Ofcom: "More fundamentally, the precise nature of future plurality concerns in the online news market are difficult to forecast." Common to the discussions in countries such as the UK, but also Germany, France, and the Netherlands, is the difficulty of adequately conceptualizing and monitoring the impact of information intermediaries on the nature of future plurality concerns in the online news market are difficult to forecast."

2. Note that there is still considerable conceptual disagreement about the concrete meaning of the notions of "media pluralism" and "media diversity." Often, both notions are used interchangeably (see McGonagle [2011], speaking of "conceptual messiness"). McGonagle suggests a pragmatic approach in that pluralism refers to issues of media ownership and the choice of the public between different providers of services, whereas diversity refers to the range of programs and services available (2011). Along these lines, this chapter uses predominantly the notion of "diversity," and only uses "pluralism" where it is necessary to explicate the difference between issues of media ownership and the choice between different programs and services.

3. Ofcom, 2012, 27, para. 5.54.
the information landscape, or understanding where the true risks to media diversity lay. The opacity of many of those platforms, and the secrecy that surrounds their algorithms and ordering mechanisms adds to this difficulty (Pasquale 2015), and requires entirely new methods of monitoring (Balazs et al. 2017). Understanding the nature of diversity concerns and potential sources of platform dominance is critical, however, to being able to identify adequate policy responses. This chapter aims to bring more conceptual clarity through developing a better understanding of platform power, how it can impact media diversity, and what the implications are for media diversity policies. In so doing, it concentrates on social media platforms. This is because of the particular role that these platforms play for news consumption but also because of the advances of at least some of these platforms into the business of distributing and aggregating news and media content. The main argument that this chapter makes is that with the arrival of information intermediaries, and social media platforms in particular, digital dominance can no longer be understood as the dominant control over content rights, outlets, or distribution channels, as used to be true with the traditional media. The true source of digital dominance is the ability to control the way people encounter and engage with information and the ability to steer their choices through the sheer knowledge about their interests and biases. More than ever media diversity has become the result of social dynamics, dynamics that are carefully orchestrated by one or few platforms. The chapter explains what implications this finding has for the way we measure and assess potential risks for media diversity on and from social platforms.

**MEDIA DIVERSITY—WHAT IT IS AND WHY IT MATTERS, ALSO ONLINE**

Does media diversity still matter? One could argue that in the digital information environment with its abundance of information media diversity has turned into a rather meaningless concept. Never was it possible to receive more information, not only from the national media but myriads of media companies, old and digital natives around the globe. This section will argue that "yes," media diversity still matters, but changing media consumption habits and the arrival of social media platforms requires us to further develop our conception of media diversity.

4. See, e.g., Ofcom, 2012, 25: "The opacity of many of those platforms, and the secrecy that surrounds their algorithms and ordering mechanisms adds to this difficulty (Pasquale 2015), and requires entirely new methods of monitoring (Balazs et al. 2017). Understanding the nature of diversity concerns and potential sources of platform dominance is critical, however, to being able to identify adequate policy responses. This chapter aims to bring more conceptual clarity through developing a better understanding of platform power, how it can impact media diversity, and what the implications are for media diversity policies. In so doing, it concentrates on social media platforms. This is because of the particular role that these platforms play for news consumption but also because of the advances of at least some of these platforms into the business of distributing and aggregating news and media content. The main argument that this chapter makes is that with the arrival of information intermediaries, and social media platforms in particular, digital dominance can no longer be understood as the dominant control over content rights, outlets, or distribution channels, as used to be true with the traditional media. The true source of digital dominance is the ability to control the way people encounter and engage with information and the ability to steer their choices through the sheer knowledge about their interests and biases. More than ever media diversity has become the result of social dynamics, dynamics that are carefully orchestrated by one or few platforms. The chapter explains what implications this finding has for the way we measure and assess potential risks for media diversity on and from social platforms."

**Media Diversity—Why It Matters, and How**

Diversity policies are anchored in our ideas about functioning deliberation in a democratic society, and as such serve potentially a whole battery of goals and values, from inclusiveness, tolerance, and open-mindedness, well-informed citizens, and public deliberation, to a healthy, competitive media landscape and industry. Diversity in the media can create opportunities for users to encounter different opinions and beliefs, self-reflect on their own viewpoints (Kwon, Moon, and Stefanone 2015), enhance social and cultural inclusion (Huckfeldt, Johnson, and Sprague 2002), and stimulate political participation (Mutz 2006).

At the core of all the different values and objectives that diversity and diversity policies serve is dominance, or rather, the prevention of dominance and a situation in which one opinion, one ideology, one group or economic power dominates all others (Craufurd-Smith and Tambini 2012; Karppinen 2013; Valcke 2004). Whether one turns to the marketplace of ideas-rational, or more deliberative or even radical conceptions of diversity—common to all of diversity's many conceptualizations (Karppinen 2013) is the ability of all voices to participate and seek an audience. The prevention of dominance as a core objective of diversity policies is also clearly reflected in the different regulatory options that have been deployed to protect and promote media diversity: the existing regulations are either concerned with avoiding and mitigating dominance or posing constraints on quasi-dominant parties so that they cannot abuse their economic and opinion power to the disadvantage of the democratic discourse and functioning media markets (Valcke 2004).

An example of the latter are the provisions that seek to promote internal diversity of supply, imposing more or less specific diversity requirements on one outlet. Typically that would be public service broadcasting, which, particularly in the earlier days of broadcasting, dominated the scene and was in many European countries the gateway to audiovisual information. Accordingly, public service broadcasting (and to a lesser extent other media services), were obliged to "enable different groups and interest in society—including linguistic, social, economic, cultural or political minorities—to express themselves" (Council of Europe 1999). Regulatory obligations to promote internal diversity or the diversity of a particular media outlet or platform include measures that guarantee a diverse composition of the programs of the public service broadcasters, provisions with the goal of protecting editorial independence, specific pluralism safeguards such as program windows, frequency sharing arrangements, provisions about the diversity of staff and program councils, list of important events, and quota rules.

**CHALLENGING DIVERSITY** [157]
Then there are measures that are directed at protecting and promoting of often referred to as structural or external diversity, most prominently the media-ownership rules. Ownership rules have traditionally formed the core of regulators’ response to the trend toward commercialization and liberalization of the media (Karppinen 2013), with the goal of preventing or countering concentrations that might endanger media pluralism at the national, regional or local levels (Council of Europe 1999, appendix, para. I). Then there are licensing requirements, the obligations to media transparency (see, extensively, Council of Europe 1994) or must-carry, due prominence rules and access obligations (Helberger, Kleinhenz-von Königslow, and Van Der Noll 2014; Council of Europe 2007).

Next to the diversity and pluralism of supply, there is also diversity of exposure to consider, that is, the question of how diverse the selection of content and speakers is that users are ultimately exposed to and consume. As the Council of Europe acknowledged, "pluralism is about diversity in the media that is made available to the public, which does not always coincide with what is actually consumed" (Council of Europe 1999). This is an observation confirmed by research finding that an increase in the diversity of content can under certain circumstances actually lead to a decrease in the diversity of the content consumed (Napoli 1999; Ferguson and Perse 1993; Cooper and Tang 2009; Wojcieszak and Rojas 2011). This is because people have only so much time and attention to spend on consuming media content. The greater the diversity of content, the greater the need to filter and select.

Filtering and selecting media content is an important function of information intermediaries, such as search engines and social media platforms. Their main goal is to channel audience attention and affect access to and the diverse choices people make. As such, they affect not so much the diversity of supply (social media platforms do not produce content), but rather the diversity of media content individual members of the audience are eventually exposed to (exposure diversity). And the key question is: are platforms an opportunity or threat to media diversity (and exposure diversity in particular)?

Are Social Media Platforms an Opportunity or Threat to Diversity?

The question to what extent social media platforms have added new opportunities or challenges for diversity is not easily answered. There is a growing body of research that finds evidence for a positive contribution of social media platforms to media diversity, and diversity of exposure in particular. In its 2017 News Report, the Reuters Institute, found that users of social media were significantly more likely than non-users to see sources they would not otherwise use. This finding echoes earlier research that finds that use of social media platforms can result in exposure to more diverse news (Bakshy, Messing, and Adamic 2015; incidental exposure to news: Lee, Lindsey, and Kim 2017, stressing the importance of heterogeneity of networks for this; in a similar direction Messing and Westwood 2014; or exposure dissenting opinions: Diehl, Weeks, and Gil de Zúñiga 2016). Others find evidence to the contrary, for example a lesser likelihood for exposure to cross-ideological content (Himelboim, McCrey, and Smith 2013) and the existence of echo chambers due to confirmation bias (Quattrociocchi, Scala, and Sunstein 2016). Yet others produce mixed evidence (Flaxman, Goel, and Rao 2016; Lee et al. 2014, finding that while social media platforms can increase exposure to diverse news, people who are more active in political discussions on SNSs are more likely to be polarized; Stroud 2008, on the role of exposure to particular kinds of content; Lee, Lindsey, and Kim 2017 on information overload as moderating factor, or Anspach 2017, on the importance of settings and the role that shares, likes, and comments can play for engagement).

What this research shows is that for social media, different factors than in the traditional media determine the level of diversity users are exposed to. Such factors can include the settings of the filtering and recommendation algorithms, and which kinds of content the algorithm decides to prioritize or suppress. Inasmuch, the MindBook example and the potential of its recommender to narrow down the information diet to a choice of selected topics that the algorithm considers relevant is far from being futuristic. If there is one aspect that the debates about Facebook Newsfeed have made clear, it is the impact of the recommendation mechanism on the selection of contents in users’ newsfeed and the fact that the criteria that determine the selection differ strongly from the editorial criteria that matter in the traditional media (Devito 2017; Bucher 2012). This raises the more normative question to what extent diversity and pluralism should still matter in the context of social media platforms. Social media platforms are not media in the traditional sense, nor is their main purpose to inform, and do so in a way that reflects the diverse topics and voices that constitute our democratic societies (Devito 2017). Still, the Council of Europe highlights the importance of diversity in the context of the criteria according to which search results are selected, ranked, or removed (Council of Europe 2012). The importance of diversity as a regulatory goal has also been highlighted by UK regulator Ofcom in its review of its diversity and plurality measurements (Ofcom 2012). In this
context, Ofcom referred explicitly to the opportunities but also challenges that come from digital platforms. According to Ofcom, “[t]here is a risk that (social media) recommendations are used in a manner that narrows citizens exposure to different points of view, by reinforcing their past habits or those of their friends” (Ofcom 2012, 25). And further: “If however they were to start exercising a greater degree of editorial control in the future, then this could raise significant plurality concerns” (Ofcom 2012, 26). In a similar vein, in the Netherlands, the Dutch regulatory authority for the media sector observed that the true risk online is not so much that the overall offer will be less diverse, but rather that the offer that is accessible to (individual) users may be less diverse as a result of algorithmic filtering such that users are not even aware of the size and diversity of the overall offer. Seeing the growing importance of social media platforms for the way users encounter and engage information (Reuters 2017), and the impact that at least the larger platforms exercise on the overall structure of news markets and information flows (Moore 2016; Kleis Nielsen and Ganter 2017), there are strong reasons to argue that diversity should matter, in one way or other, also in the context of social media platforms. And if one follows Karppinen in ultimately conceptualizing diversity as a matter of distributing communication power (Karppinen 2013, 114), it becomes clear that leading social media sites cannot be left outside diversity considerations.

The question then is not so much whether media diversity still matters in a platform context. It does. The question is rather how and in which form. One of the reasons why policymakers find it so difficult to understand and handle the issue of diversity on social media platforms is that exposure diversity as a normative goal is still little understood and only beginning to trigger a—much needed—discussion (Craufurd-Smith and Tambini 2012; Helberger 2012; Valcke 2011). The other reason is that in order to be able to understand risks and opportunities from social media platforms potentially for diversity and pluralism (as normative goals), it is necessary to understand how exactly platform power is affecting the realization of media diversity and pluralism. The following sections therefore develop a conceptual framework to better understand the risks to, and opportunities from, social media for diversity and pluralism.

In order to understand the true impact of platforms on media diversity and pluralism, it is important to view platforms in terms of their business models (and economic incentives)—the means that they use to distribute content and their role in the wider information ecology. From the point of view of diversity policies, it is also important to understand how platforms differ from the more traditional media, such as broadcasting and newspapers. This is because existing policies have been written with the more traditional media in mind, and the differences between information intermediaries and traditional media may explain why the traditional instruments are only in part suitable to address new challenges to media diversity and pluralism. Having said so, it is also important to realize that platforms are undergoing highly dynamic transitions.

Facebook is a good example. Having set out as essentially a “tech” company, for a long time news and media content were not their core business (Van Dijk, Poell, and De Waal 2016). The core business of social media platforms was providing social media services,6 and connecting people, content producers, and advertisers. Inasmuch, social media platforms are not like traditional media, and have different business incentives. Media content has not so much the function of informing people and keeping up with an editorial mission, but rather of fueling social interactions and forming the backdrop for advertising campaigns and initiatives to keep people on the website longer. As with many user-created-content sites, however, soon the realization dawned that cat videos and vacation pictures can go only so far in arresting the attention of users—a realization that led to an increasing interest in professional content on many of these sites. Examples are Facebook’s Instant articles, Trending topics, Twitter’s Moments, YouTube’s commissioning of professional media content, or Google’s News Initiative. Common to all these initiatives is the wish to integrate professional media content into their platform—without actually producing it. As a result, the

6. Twitter: Connect with your friends—and other fascinating people. Get in-the-moment updates on the things that interest you. And watch events unfold, in real time, from every angle. Facebook: Connect with friends and the world around you on Facebook. Instagram: Instagram is a fun and quirky way to share your life with friends through a series of pictures. Snap a photo with your mobile phone, then choose a filter to transform the image into a memory to keep around forever. We’re building Instagram to allow you to experience moments in your friends’ lives through pictures as they happen. We imagine a world more connected through photos. YouTube: Geniet van je favoriete video’s en musiek, upload originele content en deel alles met vrienden, familie en anderen op YouTube. WeChat: Connecting 800 million people with chats, calls and more.
relationship to professional media producers, and impact on the overall media landscape, became increasingly complicated. And it is symptomatic how M. Zuckerberg, CEO of Facebook, has moved within a relatively short time from claiming, "We’re a technology company. We’re not a media company," to the observation: "Facebook is a new kind of platform. It’s not a traditional technology company. It’s not a traditional media company. You know, we build technology and we feel responsible for how it’s used. . . . We don’t write the news that people read on the platform. But at the same time, we also know that we do a lot more than just distribute news, and we’re an important part of the public discourse."

So what is it exactly that constitutes the communicative power of social media platforms such as Facebook, and that we need to be aware of when debating dominance, and the potential implications that these new players have for media pluralism and diversity? In this context, it is useful to return to the distinction between structural and internal diversity from the previous section.

**Social Networks and Structural Diversity**

Social media platforms do not so much affect the diversity of supply with different voices from different sources. These voices are still free to exist outside the structure of the social media platforms. Maybe the platforms’ greatest structural impact on diversity is in the way that they affect diversity of exposure and media consumption and control the users’ attention. This way they can affect not only the diversity of contents and plurality of sources that users encounter within the social media platform but also the vitality and diversity of the overall media landscape (since the media rely for their economic survival on access to users, and users’ attention).

Social media platforms stage encounters with media content, affect the “findability” of content, order and prioritize existing content, manage and direct user attention as a scarce resource, and influence the choices users make. This happens not only through offering basic search functionality but also through algorithmic or collaborative filtering and display of personalized search results and recommendations (Schulz, Dreyer, and Hagemeier 2011; European Commission 2013; Council of Europe 2012; Van Hoboken 2012). In other words, sources of communicative power or even dominance are not, as in the traditional media, the resources to produce content, IP rights, and expertise. Instead, the source of communicative power of social platforms is the control over powerful sorting algorithms and data—data about their users, about the way users engage with content, and about the best, most effective way of pushing content under the attention of users. Thereby, social media platforms are instrumental in a more conceptual shift from mass-to personalized modes of distributing media content. This is a shift in which it is not so much ownership and control over content that matters, but knowing the users, and establishing the knowledge, relationships, and technical infrastructure to trigger the engagement of users with particular types of content. This is a shift from a situation in which the news media function as our main sources of information, to a situation in which a “MindBook” sorts our information exposure according to its own logics and users’ preferences (Devito 2017).

From this it follows that the real problem with structural diversity is not so much ownership over a particular resource. The true challenge from platforms for structural diversity lies in the relationship between those making media content and those “owning users,” their data, and the tools and technologies to distribute media content and arrest (or even monopolize) users’ attention. This also means that concerns about structural diversity are no longer easily solved by counting the number of sources and diversity of content in media markets, nor will the traditional measures to protect and promote structural diversity be particularly useful in protecting and promoting structural diversity in a platform context. Instead, the key to dealing with platform power and structural diversity is to balance negotiation power, protect media independence, and ensure a fair, level playing field.

**Balancing Negotiation Power**

So far, the relationship between the old media and the new intermediaries takes the form of bilateral negotiations between traditional media outlets and the intermediaries. As Kleis Nielsen and Ganter (2017) find, these relationships can be both symbiotic and asymmetrical. "Digital intermediaries may need news in a broad sense, or at least benefit from it. But it is not at all clear that they need any one individual news media organisation, even large ones" (Kleis Nielsen and Ganter 2017). And while private ordering and the way platforms manage their relationships with users has been subject to growing attention from the perspective of contract law

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7. [http://money.cnn.com/video/technology/2016/08/29/facebook-ceo-were-a-technology-company-were-not-a-media-company-cnnmoney/](http://money.cnn.com/video/technology/2016/08/29/facebook-ceo-were-a-technology-company-were-not-a-media-company-cnnmoney/)

and the fairness of terms of use (Loos and Luzak 2016; Wauters, Lievens, and Valcke 2014), a parallel discussion of the fairness of the terms in the agreements between media companies and publishers and broadcasters is still largely missing. Arguably, future media diversity policies need to add to their toolbox means to assess the fairness of deals in such asymmetrical relationships, as well as ways of improving the negotiation power between publishers and information intermediaries. This can include not only initiatives to promote the transparency of such deals, to stimulate the media to bundle their forces, but also ways to stimulate the openness of collaborations with third parties (similar to the way in which, e.g., telecom operators have a negotiation duty) and scrutiny of the fairness of the conditions under which media content is presented and distributed via platforms (e.g., brand visibility, data management, and data and revenue sharing). Inasmuch, the tools developed in telecommunications law (and under the European Access Directive in particular) might provide an interesting route to learn from as an area in which the regulator has developed a system of assessing the fairness and openness of B2B negotiations, also and particularly from the perspective of their impact on the openness, competitiveness of, and choice within communications markets.

The Importance of Media Independence

One structural problem or danger in any asymmetrical relationship is dependence. The aspect of dependency has been also identified by Nielsen and Ganter in their study, who point in this context to "a tension between (1) short-term, operational, and often editorially led consideration and (2) more long-term strategic considerations focused on whether the organisation will become too dependent on these intermediaries for reaching audiences, and in the process will control over its editorial identity, access to user data, and central parts of its revenue model" (Kleis Nielsen, Ganter 2017). The problem of dependencies deserves to be taken seriously, particularly from the perspective of the role that the media play in the realisation of the fundamental right to freedom of expression as public watchdog and fourth estate—a role that they can play only if they remain independent from states as well as from commercial power. Dommering warns that the traditional media are at risk of losing more and more of their identity in their attempt to assimilate and create a functional symbiosis between themselves and intermediaries (Dommering 2016). And Van Dijk & Poell point to the risk of new dependencies as the result of a shift in the news process from "an editorial logic to an algorithmic logic," a shift whose main driver are platforms (Van Dijk, Poell, and De Waal 2016). Media law and policy in Europe have a long tradition of dealing with the independence of the media, be it the constitutional safeguards in Art. 10 ECHR against state censorship, or the extensive rules on advertising, sponsoring, and separation of editorial and commercial content in the relationship to commercial players. It is high time to revisit these rules in light of the intrinsic relationship between the media and information intermediaries.

Fair, Level Playing Field

Finally, the point about the fair, level playing field relates to the question whether it is still justified to treat offline and online media differently, and impose far stricter rules and diversity expectations/requirements on the former while maintaining a light-touch approach for the latter. For a long time, the key argument for justifying a stricter regulation of the broadcasting media vis-à-vis the online media has been the alleged persuasiveness of video (Barendt 1993). One may wonder to what extent broadcasting is still more persuasive than the communications of media content via, for example, social media platforms. Arguably, social media platforms can have an equal if not more persuasive impact, particularly if these platforms use the deep insights they have about users to refine their targeting into persuasion strategies. What is more, these platforms have the tools and power to engage users to act on information, and influence civic behavior (Moore 2016, 54). The difficulty here is understanding the true nature of editorial control/responsibility and diversity on social media platforms.

To draw a preliminary conclusion: when assessing platform power (or even dominance) over a media sector, new benchmarks need to be developed that include the amount of consumer data, characteristics of the recommendation algorithm, and number of users, activity of users, and also the balance in the contractual conditions between platforms and media companies, the level of independence of the media from platforms, and the existence of an equal level playing field. Doing so may also require new forms of monitoring and measuring diversity, for example, in order to be able to ascertain the level of diversity that different categories of users on different platforms are eventually exposed to.

Internal Diversity

Internal diversity considerations figure very prominently in the ongoing public policy debate about impact and responsibility of information intermediaries. These are fears about filter bubbles and echo chambers (see Pariser 2011; Sunstein 2000; High Level Expert Group on Media Freedom and Pluralism 2013). But these fears must be seen in context: as long as people have the opportunity to receive information from different sources (multisourcing), the fact that they receive a less diverse information diet on one platform can be counterbalanced by access to more diverse information on another, for example, in the public service media or the traditional press (see Zuiderveen Borgesius et al. 2016; Nguyen et al. 2014; Schmidt et al. 2017). To the contrary, in a situation in which one particular platform has become the dominant source of information (as in the MindBook example in the introduction), the internal diversity of that platform does matter. In the MindBook example, alternative sources have been crowded out of the market, and with them also the opportunity for users to learn what information they might be missing in their MindBook-only diet. Seen from this perspective it also becomes so evident why platform dominance is, or should be, of such concern for media policymakers, and why it is important to protect and promote structural diversity. In addition, and with the growing relevance of (some) platforms as important and maybe even exclusive gateway to information access (Reutets Institute for the Study of Journalism 2017), questions of internal diversity within the platforms come to the fore.

In the public policy debates so far there have been no shortage of suggestions of how to hold platforms more accountable for the diversity within their platforms and to impose internal diversity safeguards (Paal 2012; Foster 2012; Neuberger and Lobigs 2010; Schulz, Dreyer, and Hagemieier 2011). The problem with most of these suggestions, and the real challenge for future media law and policy here, is understanding how diversity works on social media platforms and what the actual contribution of platforms is to internal diversity.

Taking into account the growing number of users for whom social media platforms are the main gateway to accessing and experiencing media content, the issue of internal diversity becomes more and more pressing, and also inevitably more complex. This is because diversity on social media platforms is no longer a matter of an editor who determines what a (sufficiently) diverse mix of contents is. Diversity is increasingly also a matter of how users engage with that content, share, prioritize, like, or dislike it, and the extent to which the architecture and design of a social media platform enables and steers such engagement. In other words, to truly understand the impact on, and power of platforms over, the internal diversity within the platform it is important to understand the impact that platforms have not only on the selection of the content itself but also on the conditions under which users encounter and engage with content. This is essentially a user-driven perspective on diversity that corresponds to the social character of platforms.

To give but two examples: Filtering, search, and self-selected personalization are examples of activities by which users themselves actively influence the diversity of contents they wish to be exposed to (Van Hoboken 2012). And through activities such as liking, flagging, rating, and sharing, users can actively influence which contents others are exposed to (Geeritz and Feldon 2013; Crawford and Gillespie 2016). Engagement and using (diverse) content is critical to deliberate, show different perspective, or form an opinion. On social platforms, users can actively engage with diverse content in the form of actively contributing to the deliberation (through blogs, posts, comments, etc.). They can also engage in more symbolic ways, for example, through liking, voting, rating, and so forth.

Platforms create the organizational framework and opportunities for exposure to and engagement with diverse content. Inasmuch, social media platforms not only distribute media content but also create their very own versions of "privately controlled public spheres," in which users not only encounter diverse content but also engage and deliberate, share and contest. This is where their true contribution to and power over diversity within the platform lies. And this is also where their social responsibility lies. Platforms' influence on news distribution and exposure, and ultimately diversity, can include measures and design decisions at the level of content (e.g., providing opportunities for UGC, and for user-led editing), engagement (possibilities to comment, post, or express consent or dissent), and network (through the ability to create groups, invite friends, etc.). Three examples may demonstrate my point in more detail, but also how the "diversity-by-architecture" perspective may provide new interesting avenues for diversity policies and research.

Diversity versus Popularity-Based Recommender Design

The first and probably most obvious example is the settings of the recommender algorithms. Search, personalization, and recommendation play a rather pivotal role for both exposure to information and diverse exposure (Van Hoboken 2012). How important that role can be has been proven
once again by the fierce controversy around Facebook's Trending Topics algorithm and claims of bias. A closer look at the editorial guidelines and instructions for the human editors of Trending Topics revealed that considerations of media diversity were more or less absent in Trending Topics (meanwhile Facebook has again changed its algorithm and probably also the editorial guidelines in response to the Trending Topics criticism). Trending Topics editors were, for example, asked to get a good overview of what is trending, the Facebook Trending algorithm that notes whether topics are disproportionately often mentioned, engagement (likes, comments, and shares) and what the headlines from top news sites suggest that is trending, namely a selection of news websites that is strongly US/UK centered. Arguably, the Trending Topics algorithm thereby completely failed to reflect the diversity of the media scene in Europe, local content, and so forth. More generally, many recommender systems display a certain bias toward popular recommendations or recommendations that reflect individual interests and personal relevance (DeVito 2017) (such as in the MindBook example). To the contrary, it is, at least technically, also possible to program recommendation algorithms in a way to promote more diverse exposure to contents (Adomavicius and Kwon 2011; Munson and Resnick 2010; Helberger, Karppinen, and D’Acunto 2018). More sophisticated recommendation algorithms that also take into account medium-term objectives such as diversity, or at least giving users a choice between different recommendation logics, may have a positive effect on the diversity of content users are exposed to. Also, there are more and more third-party tools and applications available whose objective it is to make people aware of their filter bubbles, to encourage them to diversify their media diet, and to stimulate their curiosity. Stimulating initiatives like these, and giving prominence to such tools, could be a new and potentially far more effective approach in fostering diversity on platforms than traditional policy responses, such as the must-carry or due prominence rules suggested earlier (Foster 2012; Danckert and Mayer 2010; European Commission 2013). Arguably, dominance thereby also becomes a question of how open platforms are to alternative recommendation settings and technologies on their platforms that help users to critically question the recommendations by one party (e.g., the platform), and discover alternative recommendations by others.

Diversity of the Personal Social Media Platform

A growing body of research does show that the diversity and heterogeneity of the social media platform is an important aspect for the quality of the deliberative process, and the openness toward other ideas and viewpoints (Jun 2012; Huckfeldt, Johnson, and Sprague 2002; Bakshy, Messing, and Adamic 2015; Messing and Westwood 2014). And while it is true that it is primarily users who decide who will be in their social media platform, social media do exercise some influence here as well (Diehl, Weeks, and Gil de Zúñiga 2015). Facebook, for example, suggests not only certain groups and friends but also whom to (not) follow, by making recommendation for pages similar to the ones one already follows. Note that the only option offered so far is "pages similar to," and not "pages other than" or "pages likely to provide a contrasting viewpoint." Inasmuch, social platforms could learn from research that shows the presence of dissenting minority views in a group can promote openness toward, and consideration of alternatives at a group level and enhance problem-solving (Nemeth 1986). More generally, the extent to which users encounter cross-cutting content also depends on who their friends are (Bakshy, Messing, and Adamic 2015). Accordingly, stimulating the deliberate inclusion of such minority or contrasting actors could be a way to improve the quality and diversity of engagement on social media platforms. Understanding better the dynamics of diverse engagement on social media platforms, and how personal, social, and contextual characteristics contribute to diversity of exposure may be another way of stimulating diversity online (compare, e.g., Bramouillé and Rogers 2009; Swapneel et al. 2011). Furthermore, such understanding can inform the architectural design choices that stimulate engagement with a (heterogeneous) group of friends (Anspach 2017).

Privacy and Diversity

The final example to be discussed here are the privacy settings that are offered by social media. At first sight, privacy and media diversity may not appear to have much in common, but they do. Kwon, Moon and Stefanone show, for example, that the privacy affordances that are provided by a social medium can have an effect on the way users post and engage with content, including less popular, counterattitudinal content and content reflecting minority opinions (Kwon, Moon, and Stefanone 2015). On a more fundamental level, media diversity, as a constituting factor of freedom of expression and the role of the media in a democratic society, can

11. E.g., Huffington Post's "Flipside"; BuzzFeed's "Outside Your Bubble"; "Read across the aisle"; "Blue Feed, Red Feed"; "Escape Your Bubbles"; "Filterbubbleus.se"; "AllSides."
only function if users enjoy a certain autonomy, that is, independence from the government or commercial forces, in making their decisions and weighting the arguments. Privacy rights, for example, can provide the necessary democratic breathing space for individuals to form their distinct and diverse identities and ideas (Richards 2008; Cohen 1996). Put differently, protecting the privacy of users, in their relationship to the media and also to advertisers and other third parties that seek to influence the way users choose and reflect on media content, is a way of protecting the very values that we hope to promote with media diversity: critical and diverse thinking. Dawes speaks in this context of a "political privacy" dimension. He argues, "[v]iewed from a civic republican perspective, therefore, the political legitimacy of the state is guaranteed by the public sphere, which in turn is dependent upon privacy" (Dawes 2014).

None of the aspects mentioned here—diversity of the recommender system, diversity of the social media platform, and level of respect for users' privacy and autonomy—are among the traditional benchmarks for assessing media diversity or dominance. And yet, as this analysis has demonstrated, these are factors that matter in the dynamic and user-driven construction of diversity online. One very concrete conclusion from this is that the assessment of diversity and the ability of particular parties to dominate the media landscape online not only must follow established criteria (such as the number of sources available, the diversity of categories of content presented, etc.) but also must be able to incorporate new criteria, including the extent to which users are (truly) free to choose between different sources and contents and enjoy both the options and the autonomy to do so.

CONCLUSIONS

This chapter has sought to sketch the contours of a new conception of media diversity, one that is able to take into account the new, deeply social dynamics of platforms in online media markets. It has argued that in order to truly understand the platforms’ potential impact on media diversity and media pluralism, it is critical to look at platforms not in isolation but in their relationship toward (1) other media outlets that they distribute and (2) users.

The true impact of information intermediaries such as social media platforms on media diversity is not so much whether they are willing and able to present users with diverse packages of information in the sense that traditional media editors do. The contribution of social platforms runs much deeper: they create the organizational and architectural framework and opportunities for exposure to and engagement with diverse content. This also means that diversity as a value or even public policy objective on social media platforms has not the same meaning as diversity in the traditional media context. Media diversity on social media platforms must be understood as a cooperative effort of the social media platform, media organizations, and users. The way users search for, engage with, like, shape their network, and so forth, has important implications for the diversity of contents, ideas, and encounters that they are exposed to. Similarly, the way the traditional media collaborate with information intermediaries to distribute content and reach viewers impacts structural diversity.

When seen from this perspective, it becomes clear that the impact of information intermediaries on media diversity is not easily understood (or monitored) with existing mainstream conceptions and measures of diversity (such as the diversity of opinions and ideas from different sources). For the same reasons existing diversity safeguards are of only limited use in protecting and promoting diversity within, and in the presence of, powerful social media platforms. Instead, future diversity policies need to turn their attention to (1) the relationship between traditional media and information intermediaries, with the goal of establishing a more equal level playing field and structural diversity; and (2) the relationship between platforms and users, with the goal of promoting the architectural and organizational measures for users to be able to encounter and engage with diverse content.

This also means that when assessing the impact of platforms on the diversity of media markets we need to include methods and factors into the media regulators’ toolbox that may go beyond the traditional framework for assessing dominance. Such factors can include the balance in the contractual conditions, control over data, or sophisticated recommendation algorithms between platforms and media companies, the level of independence of the media from platforms, and the existence of an equal, level playing field. It can also include factors such as the openness toward alternative recommendation metrics and the extent to which users are truly free in choosing among different voices and opinions online.

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