



ATTN: Mark Zuckerberg, Chairman and CEO, Facebook
CC: Kevin Chan, Head of Public Policy, Canada, Facebook

Re: Opening Internet.org and Free Basics

OpenMedia and our supporters around the world are gravely concerned with the discriminatory practices of Facebook's Free Basics platform (previously called "Internet.org"). Many of the concerns raised in the [Open Letter to Mark Zuckerberg Regarding Internet.org, Net Neutrality, Privacy, and Security](#) sent from OpenMedia and nearly 70 other organizations from 31 countries have yet to be adequately addressed. Since the letter was published, we have engaged over 60,000 Internet users from around the world through our [No Fake Internet](#) campaign, and, recently, ran a large [billboard](#) near your head office in Palo Alto, California.

We appreciate the dialogue that you have engaged in with us up to this point, and we hope that the requests in both this and the aforementioned letter can continue to be addressed in order to advance an Internet that is truly open and accessible for all. However, we are concerned by how far we currently stand from this endpoint. Significant concerns remain with Free Basics, a service that [violates](#) Net Neutrality, positions Facebook as a global gatekeeper for the Internet, puts users' privacy at [risk](#), and creates new opportunities for repressive state [censorship](#).

First off, we appreciate your willingness to address our concern that Internet.org misled users into believing the service was the *real* Internet, rather than a restricted service. In this regard, "Free Basics" is a much more honest name. We also welcome the move to end agreements allowing select mobile carriers exclusive access to the program in a given region. However, while this decision will no doubt help create choice in many developing telecommunication markets, it still fails to address our core concerns, by continuing to expand the user base of a closed-off version of the Internet.

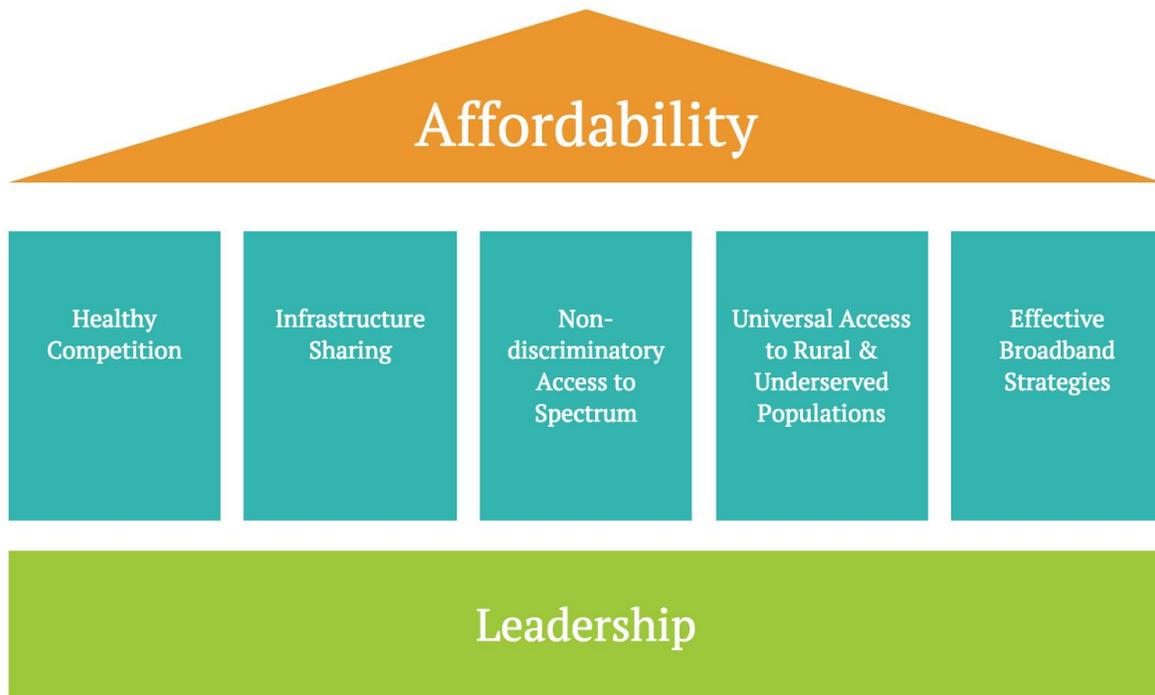
Secondly, we would also like to appreciate the [progress](#) that has been made in securing privacy and security for Free Basics' users. While the service stops short of end-to-end encryption, you have made it more difficult for government officials to engage in dragnet surveillance of Free Basic's users. However, we still firmly believe that the gatekeeper powers built into the platform inevitably give both Facebook and various nation-states greater ability to collect user traffic and censor content. Centralizing the Internet in this way carries huge risks, and is a problem for open Internet advocates – full stop.

Recent [protests](#) against Internet.org at the Internet Governance Forum in Brazil serve as a timely reminder of the wide range of Internet users, civil society organizations, and businesses around the world that are speaking out with their concerns about your controversial platform. Advocates from India, Brazil, Zimbabwe, Paraguay, Colombia, and Panama, amongst others,

are deeply concerned about the implications Free Basics has for their friends, families, local economies, and overall digital infrastructure.

In some cases, Free Basics has actually undermined long-standing regional efforts to develop access to the full, open Internet, as is the case in Panama, where the national government abandoned their *National Internet Project* after meeting with Mark Zuckerberg. The initiative also undermines international efforts like those of the Alliance for Affordable Internet (A4Ai).

There is no doubt that connecting the unconnected will require creativity, hard work, and regionally-specific solutions. Sadly, there is no “one-size-fits-all” solution. But one thing is clear: **If Facebook wants to promote access to the Internet, then it should be to the *whole* Internet – the *real* Internet – not a closed platform made through special zero-rated billing arrangements.** In contrast to such an approach, see for yourselves how A4Ai has distilled the essential components of affordable access into a bottom-up model:



As it stands, Facebook’s Free Basics unnecessarily blocks the websites, apps, and services the open Internet thrives on from being made available on equal terms. What’s worse, Free Basics is poised to have a worrying impact on local economies, making it even more difficult for struggling services and initiatives to gain a foothold online. In a world where Free Basics acquires a significant share of those online in a given region, it appears all but impossible for [Africa’s next social media network](#) to attract users and become successful. Unfortunately, this approach may increase access in the short-term, but does harmful damage to the diversity of the digital ecosystem in the long term.



The open web has been a boon for free expression, access to knowledge, democratic participation, and new forms of commerce precisely *because* it's an open platform. When you insert a government or business gatekeeper you subvert all of the empowerment that stems from this amazing, global tool. Every project that tries to impose a top-down, centralized vision of the Web erodes the human potential that comes from permissionless innovation. The next 3 billion Internet users deserve the same opportunity to unfettered connectivity.

Thus, we formally request Facebook make the following four core changes to Free Basics:

First, provide full Internet access with a basic usage cap.

Free Basics does not offer access to the open Internet. Instead, it offers access to a walled garden wherein the next three billion people will only be able to access a limited set of websites and services. While we can see the logic of this as a business model, it is no excuse for circumventing good public policy or replacing or undermining projects that seek to connect the unconnected to the open web.

As we (and others) have argued elsewhere, having Facebook act as the de facto gatekeeper of online content and services for the next three billion Internet users is far from ideal. It violates Net Neutrality, and places damaging limits on free expression and innovation.

Thus, we recommend a more open approach, wherein access to the full Internet is provided, with a usage cap of, for example, 20 MB per day, as is the case in the Mozilla-Grameenphone example cited below. As [experts at the Electronic Frontier Foundation](#) have suggested, Facebook could zero-rate all mobile-accessible websites within that cap. If Facebook wishes to stand by its claim that Free Basics is an on-ramp to the full Internet, then this capped approach would both address gatekeeper concerns, keep the program manageable from a financial perspective, and create a stronger incentive for users to take the next step in digital connectivity and access.

Another approach we prefer to Free Basics is what Mozilla employed in [partnership](#) with Grameenphone in Bangladesh, where they offer a deal that "...allows users to receive 20 MB of data usage for free each day, in exchange for viewing an advertisement."

Ultimately, if you want to promote access to the real open Internet through Free Basics, then you should investigate models, such as those proposed above, in which all content, applications, and services are treated equally, without any discrimination, at a rate that is reasonable and affordable. We also encourage investment in technologies and approaches that make mobile content on the open web load more efficiently, rather than requiring content producers to host their content on Facebook servers.



Second, participate in the development of a shared open standard for low-bandwidth apps.

We appreciate that you have opened and clarified the criteria for websites to participate in Free Basics so that, ostensibly, all websites that follow the technical requirements for low-end feature phones are eligible to join the programme.

However, an important next step would be for you to lead in the development of an open standard for the feature phone-compatible websites such as those targeted by the Free Basics platform. This could be done by leveraging Facebook's considerable resources toward the development of a W3C standard for a feature phone-friendly, low bandwidth variant of modern [HTML standards](#).

This would enable Internet users around the world, including those in regions impacted by Internet.org's presence, to develop new innovative services, apps, and content. This would then allow you to zero rate all services that abide by the open standard on the platform, ensuring they are not discriminated against. If need be, you could cap usage to keep costs under control.

An open W3C standard and, where applicable, best practices would make compliance easy to demonstrate, and help ameliorate some of the concerns over Facebook's gatekeeper role in the platform. In addition, we believe that you should make a clear commitment to refrain from prioritizing some services over others, such as through default or bookmarked content on the Free Basics interface. This process should be fair and open, so that you do not find yourself acting as the curator of the most popular services on Free Basics. Users should also be able to easily remove or deselect services they do not want to see.

Third, support existing local non-discriminatory universal access initiatives.

As signatories of the [Open Letter](#) note:

Many of us have been working for years on initiatives to bridge the digital divide, such as building Internet access facilities in public libraries and telecentres, supporting community broadband, local telecom ventures, public investment in broadband infrastructure, making websites and services more accessible to people with feature-phones and more. We have always sought to provide non-discriminatory access to the full open Internet, without privileging certain applications or services over others and without compromising the privacy and security of users.

Initiatives such as these aim to connect the unconnected to the real, open Internet, without restrictions on which websites, apps, and services can be accessed. These projects are often underfunded and understaffed, and have limited reach. However, they aim to connect users on the other side of the digital divide to the full, unrestricted Internet without acting as a gatekeeper or intermediary. These projects adhere to the true definition of Net Neutrality, which would



ensure all applications and services are treated equally and without discrimination. Any project supported or undertaken by Facebook should respect these values and priorities.

We welcome [Facebook's support](#) for the UN's [global goal of universal Internet access by 2020](#), but if you truly want to "connect the two thirds of the world that doesn't have internet access," then you should be using your immense resources and influence to boost the countless community-driven initiatives that are already on the ground working to provide full Internet access to impoverished people around the world.

We believe that your efforts would be best served by seeking opportunities to support local Universal Service Funds and other universal access initiatives, such as Plan Ceibal in Uruguay. Your work could lead independent research into a comprehensive map of community-based Internet access projects around the world. Once the mapping exercise is finished, we would hope you will support local projects on the go in various regions.

Some projects that could be supported immediately include, but are not limited to:

- [Brazil](#): Coletivo Digital will build 3,000 "digital inclusion telecenters" across the country.
- [Uruguay](#): Plan Ceibal promotes free access.
- [A4Ai](#): Alliance for Affordable Internet.
- [Panama](#): The National Internet Project (which was abandoned upon the entrance of Internet.org).
- [Pakistan](#): Close the Digital Gap
- [Global](#): Projects supported and proposed by the Association for Progressive Communications.

In short, if you want to promote access to the Internet, then it should be to the whole Internet – the real Internet – not just Free Basics' restricted version. And we believe supporting community-led initiatives already on the ground is the best way to do this.

Finally, support local groups working to keep the Internet free and open.

Facebook could be a crucial ally in the many policy battles that impact the fate of the open Internet. Hundreds of understaffed and under-resourced digital and human rights organizations around the world are working tirelessly to ensure that the Internet remains the open, participatory, and democratic platform it has served as since its inception.

In this work, Facebook, and your Free Basics platform, could act as a powerful resource to amplify, fund, and spur advocacy for policies in favour of keeping the Internet truly free and open. As the [Open Letter](#) mentioned above concludes:



Facebook, in its stated intentions to connect billions to the Internet, should strongly support and advocate for safeguarding the principle of net neutrality, privacy, security and other user rights in its discussions with national governments and regulators, while also applying these standards to its business initiatives.

Facebook has a huge role to play, and we hope you will consider putting your resources toward grassroots and policy-focused organizations advocating for the open web. In short, we encourage you to become a consistent ally of digital rights organizations around the world. We hope that you will look for opportunities to support their efforts and encourage your large user base to participate in grassroots online campaigns.

Thank you for your attention and we look forward to hearing back soon.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Anderson", set against a light yellow rectangular background.

Steve Anderson
Founder and Executive Director, OpenMedia