



June 1, 2016

Facebook, Inc.
1 Hacker Way
Menlo Park, CA 94025

Dear Mark Zuckerberg,

We are writing to you in your roles as Chairman and CEO to seek further engagement with your company about the results of the [Ranking Digital Rights Corporate Accountability Index](#). The Index ranked 16 of the world's leading internet and telecommunications companies on their disclosed policies and practices with respect to privacy and freedom of expression online. As you are likely aware, the sector-wide results were disappointing. Several companies performed poorly on objective indicators that measure adherence to best practices for reporting and transparency.

Facebook performed measurably better than many companies. Yet we are writing publicly to all companies ranked in order to further motivate sector-wide improvement. Drawing upon the Index results, we have prioritized recommendations to each company to pick off the "low-hanging fruit" that could improve your ranking in future releases of the Index.

We do not need to tell you the importance of respecting digital rights. You know that addressing human rights challenges in an accountable and transparent manner is good for business, and that your company's health and wealth depend on the trust of your customers.

Investors, too, require accurate and meaningful data on your firm's performance -- financial and otherwise -- to show why they should continue to commit to your growth. Policymakers seeking to protect their constituents' interests look to you for clear statements and policies to verify that you are complying with laws and norms. Despite laudable efforts by companies that ranked near the top of the Index, users remain in the dark about many company practices impacting their human rights, which is a key reason we are pushing even companies that performed relatively well in the Index to make further improvements.

Positively, Facebook is performing strongly in stakeholder engagement and public articulation of its commitments on privacy and freedom of expression. Since the Index release, you have taken several measures to improve accountability as well as practices. Facebook provided greater clarity on the contents of the transparency report, enabled two-factor authentication as a security measure for Instagram, and enabled end-to-end encryption for WhatsApp, providing a significant boon for protecting people's privacy and security worldwide.

To further improve your digital rights record, we recommend that Facebook take these specific steps with regard to specific services:

- Ensure that disclosures for Instagram and WhatsApp match if not exceed the disclosures of your social network, Facebook.
- Enable accessible end-to-end encryption for messaging in Instagram and Facebook.
- For WhatsApp, develop appropriate remedy mechanisms for users who feel their free expression or privacy rights have been violated, and implement executive and management oversight of freedom of expression and privacy issues.
- Make translations of key policy documents (such as terms of service, privacy policy, and community standards) freely available in languages representing your key user bases, without requiring users to sign in or download the app to read them, for Instagram and WhatsApp as you do for Facebook.

Regarding all your services, we recommend that you:

- Report information about the requests received from courts in civil cases, requests from private parties and enforcement of your own terms of service.
- Publicly disclose on your website the scope and scale of the Global Network Initiative's independent assessment of your policy and practice.

Your company can raise its score in the Index by taking the steps outlined above, implementing other recommendations identified in the Index, and by continuing to address sector-wide challenges as part of organizations like the Global Network Initiative. By doing so, you would distinguish your company as a sector leader, and earn a reputation among your customers as a defender of their human rights.

We commend your corporate officers for engaging with our staff, members of the Ranking Digital Rights research team, and other advocacy groups in private conversations about ways in which your company might improve its policies and disclosures around freedom of expression and privacy. However we also believe that it is important to communicate with the broader community of users and global stakeholders. As a first step, we urge you to respond in writing to this letter and the recommendations we highlight from the Corporate Accountability Index.

We are happy to speak with you about your results and work with you in developing a response.

Sincerely,



Peter Micek
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