



Public Comment Appendix for

2021-007-FB-UA

Case number

Case description

In early 2021, a Facebook user in Myanmar posted a text in Burmese on the platform. According to the translation that Facebook provided to the Board, the post criticises the current situation in Myanmar following the 2021 military coup d'état and suggests ways to limit financing to the military. It proposes that the Committee Representing Pyidaungsu Hluttaw (CRPH), a group of legislators opposed to the coup, announce that there be no legal guarantees for companies that do business with the military and that legal consequences for these companies be explored. The post proposes that tax revenue be given to the CRPH. It also suggests that individuals have access to foreign online banking and cites Hong Kong as an example. Facebook's translation included several terms referring to "China" or "Chinese", possibly with profanity (Facebook identified "\$၀ရု၀်" as the phrase that violated its policy). The post received about 500,000 views and was shared about 6,000 times.

Facebook removed the post under its Hate Speech Policy after it was reported by an "administrative action bot". No Facebook users reported the post. Under its [Hate Speech Community Standard](#), Facebook takes down content targeting a person or group of people on the basis of their race, ethnicity and/or national origin with "profane terms or phrases with the intent to insult, including but not limited to fuck, bitch, motherfucker".

The user submitted their appeal in English to the Oversight Board on 16 April 2021. The user stated in their appeal that they posted this content to "stop the brutal military regime" and restore democracy in Myanmar. The user also reiterated their position against the Myanmar military regime's funding and source of income. The user speculated that the Myanmar military regime's informants reported their post and profile "as threat" and as violating Facebook's Community Standards. The user also stated that "someone who understands Myanmar language" should review their post.

The Board would appreciate public comments that address:

- Whether Facebook's decision to remove the post is consistent with the company's Hate Speech Community Standard, specifically the rule against profane terms or phrases with the intent to insult.
- Whether Facebook's decision to remove the post is consistent with the company's [stated values](#) and [human rights responsibilities](#).

- Information about the social and political context in Myanmar, including efforts to discourage companies from engaging financially with the Myanmar military regime and to financially support the CRPH as well as the relationship between the Myanmar military regime and China. This information would help the Board better understand the possible intent and impact of the post.
- Trends in discourse around foreign government intervention in Myanmar and use of potentially discriminatory language in that context.
- Information about Facebook's potentially erroneous enforcement of Community Standards, for example on Hate Speech, to restrict political speech in Myanmar.
- Whether Facebook users have noted changes in Facebook's moderation and appeals in Myanmar-related posts since the 2021 coup.
- Content moderation challenges specific to the Burmese language.

In its decisions, the Board can issue policy recommendations to Facebook. While recommendations are not binding, Facebook must respond to them within 30 days. As such, the Board welcomes public comments proposing recommendations that are relevant to this case.



Public Comment Appendix for
2021-007-FB-UA

Case number

The Oversight Board is committed to bringing diverse perspectives from third parties into the case review process. To that end, the Oversight Board has established a public comment process.

Public comments respond to case descriptions based on the information provided to the Board by users and Facebook as part of the appeals process. These case descriptions are posted before panels begin deliberation to provide time for public comment. As such, case descriptions reflect neither the Board's assessment of a case, nor the full array of policy issues that a panel might consider to be implicated by each case.

To protect the privacy and security of commenters, comments are only viewed by the Oversight Board and as detailed in the [Operational Privacy Notice](#). All commenters included in this appendix gave consent to the Oversight Board to publish their comments. For commenters who did not consent to attribute their comments publicly, names have been redacted. To withdraw your comment, please email contact@osbadmin.com.

To reflect the wide range of views on cases, the Oversight Board has included all comments received except those clearly irrelevant, abusive or disrespectful of the human and fundamental rights of any person or group of persons and therefore violating the [Terms for Public Comment](#). Inclusion of a comment in this appendix is not an endorsement by the Oversight Board of the views expressed in the comment. The Oversight Board is committed to transparency and this appendix is meant to accurately reflect the input we received.



Public Comment Appendix for
2021-007-FB-UA

Case number

10

Number of Comments

Regional Breakdown

5	0	0	0
Asia Pacific & Oceania	Central & South Asia	Europe	Latin America & Caribbean
0	0	5	
Middle East and North Africa	Sub-Saharan Africa	United States & Canada	

2021-007-FB-UA

Case number

PC-10057

Public comment number

United States and Canada

Region

Debra

Commenter's first name

Parmley

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

Short summary provided by the commenter

Posts being removed based on certain words used is not verifiable hate speech. Understanding meaning of content requires human intervention not bots searching for specific words.

Full Comment

Posts being removed based on certain words used is not verifiable hate speech. Understanding meaning of content requires human intervention not bots searching for specific words. Cognitive dissonance is required in understanding context of messages, something not exhibited by bots. Even if someone were to copy and paste excerpts from written articles by reporters found on facebook. Facebook concedes the portion that was copied to be against their community standards & not the written article itself. If bot finds an offensive word it should be removed rather than condemning the whole comment & person without understanding message being conveyed. It looks like Facebook supports the coup in this instance rather than pointing out actual word(s) that is offensive.

Link to Attachment

No Attachment

2021-007-FB-UA

Case number

PC-10058

Public comment number

United States and Canada

Region

Dr. Brett

Commenter's first name

Prince

Commenter's last name

English

Commenter's preferred language

Neurobehavioral Rehabilitation Associates

Organization

Yes

Response on behalf of organization

Short summary provided by the commenter

Leave the comment up. Personal or political opinions, however unpleasant, as long as they do not directly and specifically target actual violence toward that person/group are hallmarks of free speech. A minor warning can be affixed, especially to a 'bot'-generated complaint. FaceBook cannot continue to devolve into a divisive and authoritarian-Orwellian speech policing outfit. It is beyond its brand and business model, and is acting as a self-appointed leftist government agency It stifles the free flow of ideas necessary in free societies, and actually helps feed extremism and further drive violent belief systems underground to foment and grow.

Full Comment

see above

Link to Attachment

No Attachment

2021-007-FB-UA

Case number

PC-10060

Public comment number

United States and Canada

Region

Caryn

Commenter's first name

Martinez

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

Short summary provided by the commenter

The fact that 500,000 people viewed the post, and not one human being reported the post, tells me everything I need to know: the "administrative action bot" is poorly programmed.

Full Comment

The fact that 500,000 people viewed the post, and not one human being reported the post, tells me everything I need to know: the "administrative action bot" is poorly programmed. I don't read Burmese, and your report doesn't translate the word shown in the report, but since Facebook's bots are very badly programmed when it comes to understanding English -- the company's home language -- I am confident that they don't understand Burmese, either.

Link to Attachment

No Attachment

2021-007-FB-UA

Case number

PC-10062

Public comment number

Asia Pacific and Oceania

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

Yes

Response on behalf of organization

Short summary provided by the commenter

\$တရုတ် is misogynistic, and such styling should be taken down. It is very popular for some men in Myanmar to make derogatory references to female anatomy with strong negative connotations. So while the word should perhaps be banned, I think (from what Facebook's summary description says), much of the rest of the content is valid political opinion, and I think should have been kept up. Board also needs to learn actual computer science to ask real questions about algorithms and make useful recommendations thereof.

Full Comment

In the link that's posted, the bot needs to unpack what it knows – namely, that “\$” is Burmese slang for တေတေ, which is a vulgar reference to female genitalia. If you take “\$” at face value (i.e. dollar sign), you'd think \$တရုတ် is simply referring to a perception that China loves money. I find the case briefs and the decisions themselves to be way too high level analytically. I'd decompose whether the bot concluded that \$ means money or female genitalia, what model it uses, how the model was trained, on what training dataset, etc. I'd decompose also that it's hate speech probably on misogyny (“\$”) directed towards a nationality (Chinese) or if it's a nation (China), and whether the bot banned the speech on the grounds that Facebook has a carve-out for Myanmar where direct attacks on concepts, not only people are allowed, or whether the ban was solely based on a direct attack against people, or both. Facebook should also consider whether a partial ban on the term “\$တရုတ်” rather than an outright ban of the whole post is permitted since the rest of the post indeed does valid what appears to be valid political opinion. So you'd blur out part of the post, as I think FB/Twitter did for some of Trump's posts, while retaining the parts of the post that are valid political opinion. I don't know the

unintended consequences for that, just a suggestion. Computationally, that would mean that your product team would need to weigh (just as a judge does) the valid political opinion contained in given speech against its harmful effects. This is a balancing test. I'm no computer science PhD but I believe this is the problem with Facebook's current computational approach – since the whole speech is subject to binary classification, if it's found as “1” (hate) the whole thing is taken down. I do not have anywhere near Facebook's product team's expertise but I do think an attempt at one hot encoding/softmax or something similar that would decompose all the elements of a multipart legal balancing test (as Facebook's hate speech test is, which is largely taken from the UN Strategy and Plan of Action on Hate Speech) to specific clauses in a sentence and decompose the weights would be more effective. Frankly, I tend to agree with the poster's political opinion views. They are right about the need to pay taxes to CRPH (or now NUG) instead of the military. They are right to discourage business engagement with the military. It is well-known that China has its pockets in deep with the military, including a \$2.8 billion power plant deal this week, that reportedly the military is paying with a loan, to make it indebted to China. China's misdeeds in SE Asia and its outsize influence on the Myanmar economy are well-known – the Rakhine gas pipelines, China backing the Myanmar military, and so on. So to me, the post is not offensive in this regard – it is valid political opinion. I tend to think however that \$၀၃၇၀၄ is misogynistic, and such styling should be taken down. It is very popular for some men in Myanmar to make derogatory references to female anatomy with strong negative connotations. So while the word should perhaps be banned, I think (from what Facebook's summary description says), much of the rest of the content is valid political opinion, and I think should have been kept up.

[Link to Attachment](#)

No Attachment

2021-007-FB-UA

Case number

PC-10063

Public comment number

United States and Canada

Region

Laura

Commenter's first name

D'Alisera

Commenter's last name

English

Commenter's preferred language

individual citizen/taxpayer

Organization

No

Response on behalf of organization

Short summary provided by the commenter

As an advocate for human rights, I believe it is proper for Burmese dissidents criticizing the situation in Myanmar following the recent coup, to share views on a platform such as Facebook, in the interests of free speech. It would be helpful for the Oversight Board through its considerable resources, seek a context for Burmese culture and what is/is not hate speech. Passionate speech and what is vulgar, crude and hateful, varies from culture to culture.

Full Comment

As an advocate for human rights, I believe it is proper for Burmese dissidents criticizing the situation in Myanmar following the recent coup, to share views on a platform such as Facebook, in the interests of free speech. It is not proper to use profanity or crude hate-inflammatory language, even though world media (I obtain my information through BBC America) are showing footage of brutal repression by military forces on the Burmese population. I am not familiar with Burmese culture, so I hesitate to offer an opinion about hate, bullying speech. What is offensive in one society, may differ in another. Are we applying Western, Eurocentric values to their opinions? Passionate speech and what is vulgar, incendiary and hateful, varies from culture to culture. I am no expert, but believe the situation in Myanmar is an affront to democratic values and flouts their elected form of government. The world needs to pay attention, because the ripples of their conflict, as in the Middle East, could easily spill over to the rest of the world.

Link to Attachment

No Attachment

2021-007-FB-UA

Case number

PC-10065

Public comment number

Asia Pacific and Oceania

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

Short summary provided by the commenter

In Myanmar, people call both People's Republic of China and Chinese people as တရုတ် (Ta Yote). I think တရုတ် in the post refers to country not to people (I didn't have a chance to see original post and that's my assumption). \$ (စောက်) is a little rude word in Myanmar language and people use it when they feel anger to something or someone. As China (I will use People's Republic of China as China) support Myanmar military regime both physically and mentally, Myanmar citizens anger them so much and call China as တရုတ်. So, it's not surprised that people use the term တရုတ် to show their outrage and I assumed that it's only attacked to People's Republic of China, not to Chinese people and Facebook should consider not to ban that words.

Full Comment

In Myanmar, people call both People's Republic of China and Chinese people as တရုတ် (Ta Yote). I think တရုတ် in the post refers to country not to people (I didn't have a chance to see original post and that's my assumption). \$ (စောက်) is a little rude word in Myanmar language and people use it when they feel anger to something or someone. As China (I will use People's Republic of China as China) support Myanmar military regime both physically and mentally, Myanmar citizens anger them so much and call China as တရုတ်. China has close ties with Myanmar military and support them for long time. China supplies weapons and support to SPDC regime that ruled Myanmar for 22 years. At that time, Western countries imposed sanctions on Myanmar and China grabbed that opportunity to operate their business across the country and most of their business don't have labor rights,

abuse to workers, exploit natural resources and harmful to environment. When Myanmar shifted to democratic country in 2010, people have opportunity to express their concern on Chinese's business and protests became happen. When military seized the power in February, western and other democratic condemned the coup and publicly support the democracy movement. But China said it's only internal affairs and trying to block UNSC statement that condemn the coup. While regime shut down the airport, there's regular nightly flight from China and people believe that China is sending technicians to support regime to control internet access, some believe that they supply weapons to crackdown the protestors. Myanmar people felt anger to Chinese actions and protests were happening in front of Chinese Embassy in Yangon. In late February, regime started to crack down the democracy movement and many protestors were killed but China remains silent. But in mid-March, Chinese owned factories were burnt down by unidentified group and China urged regime to protect their personal and business, which led to martial law in areas where Chinese owned factories locate and many people were killed under the enforcement of martial law. Now Myanmar people are afraid of situation like before 2010 where China monopolized Myanmar economy and creating unethical business environment, flowing cash into military expenditure. That's why Myanmar people urge China not to support regime and to conduct business ethically. But China didn't care demand from Myanmar people and still supporting regime who killed over 800 innocent democracy supporters. So, it's not surprised that people use the term **တရားမဝ** to show their outrage and I assumed that it's only attacked to People's Republic of China, not to Chinese people and Facebook should consider not to ban that words.

[Link to Attachment](#)

No Attachment

2021-007-FB-UA

Case number

PC-10066

Public comment number

Asia Pacific and Oceania

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

Short summary provided by the commenter

In Myanmar, people call both People's Republic of China and Chinese people as တရုတ် (Ta Yote). I think တရုတ် in the post refers to country not to people (I didn't have a chance to see original post and that's my assumption). \$ (စောက်) is a little rude word in Myanmar language and people use it when they feel anger to something or someone. As China (I will use People's Republic of China as China) support Myanmar military regime both physically and mentally, Myanmar citizens anger them so much and call China as \$ တရုတ်.

Full Comment

China has close ties with Myanmar military and support them for long time. China supplies weapons and support to SPDC regime that ruled Myanmar for 22 years. At that time, Western countries imposed sanctions on Myanmar and China grabbed that opportunity to operate their business across the country and most of their business don't have labor rights, abuse to workers, exploit natural resources and harmful to environment. When Myanmar shifted to democratic country in 2010, people have opportunity to express their concern on Chinese's business and protests became happen. When military seized the power in February, western and other democratic condemned the coup and publicly support the democracy movement. But China said it's only internal affairs and trying to block UNSC statement that condemn the coup. While regime shut down the airport, there's regular nightly flight from China and people believe that China is sending technicians to support regime to control internet access, some believe that they supply weapons to crackdown the protestors. Myanmar people felt anger to Chinese actions and protests were happening in front of Chinese Embassy in Yangon. In late February, regime started to crack down the democracy movement and many

protestors were killed but China remains silent. But in mid-March, Chinese owned factories were burnt down by unidentified group and China urged regime to protect their personal and business, which led to martial law in areas where Chinese owned factories locate and many people were killed under the enforcement of martial law. Now Myanmar people are afraid of situation like before 2010 where China monopolized Myanmar economy and creating unethical business environment, flowing cash into military expenditure. That's why Myanmar people urge China not to support regime and to conduct business ethically. But China didn't care demand from Myanmar people and still supporting regime who killed over 800 innocent democracy supporters. So, it's not surprised that people use the term မြန်မာပြည်ကို ဖျက်ဆီးဖို့ to show their outrage and I assumed that it's only attacked to People's Republic of China, not to Chinese people and Facebook should consider not to ban that words.

Link to Attachment

[PC-10066](#)

2021-007-FB-UA

Case number

PC-10080

Public comment number

Asia Pacific and Oceania

Region

Oliver

Commenter's first name

Spencer

Commenter's last name

English

Commenter's preferred language

Free Expression Myanmar (FEM)

Organization

Yes

Response on behalf of organization

Short summary provided by the commenter

Free Expression Myanmar (FEM) has assessed the information provided under the UN Rabat Plan of Action's six-part test, and in accordance with Facebook's "Community Standards". FEM finds that deletion of the post was unwarranted on the grounds that the phrase shared by the Oversight Board does not reach the threshold of profanity as required by Facebook in order to define the phrase as "hate speech". FEM also makes the following general comments: - Avoid repeating Facebook's Orwellian language - Recognise that crude AI and sanctions result in unnecessary and disproportionate effects - Insufficient information published for the public to provide valid comments. FEM is a human rights organisation based in Myanmar.

Full Comment

General comments - Avoid repeating Facebook's Orwellian language - Facebook has created a new language with some new words for new concepts and others used in an Orwellian way to replace words that carry negative connotations. One example is the anodyne "take down" rather than the unambiguous "delete", which it effectively is. Measuring censorship becomes harder when words conceal meaning. Recommendation: The OB Charter states that "the purpose of the board is to protect free expression by making principled, independent decisions" and this should in practice include using clear, neutral, and accessible language (for those using English as a second language), avoiding Facebook's jargon unless absolutely necessary to clarify Facebook processes. - Recognise that crude AI and sanctions result in unnecessary and disproportionate effects - Myanmar has suffered from the prevalence of "hate speech" on Facebook, much of which started as intentional incitement. Facebook's earlier inaction led to the public normalisation of "hate speech" and now, when Facebook is taking action, its use of crude AI and sanctions

to moderate content creates further risks, namely incorrect identifications, unnecessary approaches, and disproportionate sanctions. Deleting clear incitement is necessary, but blanket deletions of posts, pages, and users for “hate speech” that does not reach the incitement threshold does little to improve public knowledge, attitudes, and behaviour. Recommendation: The OB should encourage Facebook to implement a more sophisticated, proactive, and educational response with targeted sanctions incorporating international human rights standards on free expression. - Insufficient information published for public to provide valid comments - The OB has published just two words from the deleted post, plus a summary of a translation of the Myanmar language post. At the same time, the OB has asked for public comment on Facebook’s application of its rules, values, and responsibilities. For good reason there are many - including FEM - urging Facebook to take more or smarter action on “hate speech” in Myanmar, and that may be reflected in public comments. But the lack of information - particularly the actual Myanmar language - raises concerns about the validity of public comments. Uninformed comments are invalid comments. They could also influence and lead to an invalid decision by the OB. Recommendation: The OB should consider complimenting public comments with expert consultation, expert testimony, confidential discussions with trusted partners, and offering appellants the option of waiving their privacy for open justice. - Assessment under the six-part test of the UN Rabat Plan of Action -

Context: Chinese businesses and Myanmar’s longstanding history of boycott campaigns Many businesses operating in Myanmar, including those run by the military, have links to China, and China is Myanmar’s greatest source of foreign direct investment. China has been closely associated with large infrastructure projects, including those linked to human rights violations, and there is a common public perception that China is protector and benefactor to the Myanmar military. There have been many civil society campaigns to boycott, divest, and sanction Myanmar’s military businesses, military leaders, and their “cronies”, including their Chinese partners. These business-facing campaigns started decades ago but increased after 2017 and again after the coup. There is a national discourse on the role of China’s government and China’s businesses in Myanmar’s political transition, and how the public in Myanmar and globally should respond to such a role. Civil society has led a successful campaign to disentangle public confusion between Myanmar-persons-of-Chinese-descent and China itself. The Myanmar language uses the same word for China, Chinese (government), and Chinese (people). *Speaker: Unknown* The OB has not published details of the user’s position or status. *Intent: Unknown* The OB’s summary of a translation describes the user’s intent to influence government policy and law, which is protected under international human rights standards as political speech. The summary references “China” but does not clearly establish whether this is to insult (again, protected under international human rights standards) or to incite. *Content and form: Word used is not profane* Facebook deleted the post on the basis that it included the phrase “\$တရုတ်” which includes the words “damn” (\$) and “China” (တရုတ် - see above for multiple meanings). Facebook appears to regard “\$” as a profanity, defined as, “terms or phrases with the intent to insult, including but not limited to

fuck, bitch, motherfucker”, and, when followed by “တရုတ်”, is regarded as “hate speech”. However, “\$” is not comparable to Facebook’s list of examples. A middle school teacher in Myanmar may use “\$” when admonishing a child, but for an American teacher to use “bitch” would likely be a disciplinary matter. Rightly or wrongly, “\$” has achieved the status of general social acceptance and therefore should not be regarded as having reached Facebook’s threshold of profanity. As there is no profanity, the phrase “\$တရုတ်” is not “hate speech” under Facebook’s rules. This opinion may not apply to the full post, which remains undisclosed, nor should it prevent Facebook from encouraging more tolerant behaviour on its platform. Moreover, Facebook’s decision to define “\$” as profane raises concerns that either its understanding of Myanma language is outdated or its threshold is intentionally low. Either of these would indicate a potentially more extensive violation of the right to freedom of expression in Myanmar, which is a trend that FEM has observed over the past two years. *Remainder of two-page submission does not fit*

Link to Attachment

[PC-10080](#)

2021-007-FB-UA

Case number

PC-10081

Public comment number

Asia Pacific and Oceania

Region

Victoire Rio &
Htaike Htaike Aung

Commenter's first name

Victoire Rio &
Htaike Htaike Aung

Commenter's last name

English

Commenter's preferred language

Tech Accountability Initiative (TAI)

Organization

Yes

Response on behalf of organization

Short summary provided by the commenter

We find that the information provided is insufficient to allow for a meaningful assessment of Facebook's decision. A lot of the criticism we have made of Facebook's moderation revolved around lack of consideration for context and poor translations. We urge the OSB to provide an opportunity for local stakeholders to more meaningfully comment on such context by publishing the full post, anonymised as necessary. We also note concerns over the way Facebook leverages automation in its moderation, pointing in particular to the lack of transparency and consistency in Facebook's use of slur lists as well as limitations with Facebook's appeal process. We provide a set of concrete feedback and recommendations to both Facebook and the OSB.

Full Comment

We find that: * It is not possible to meaningfully assess the decision without seeing the actual content * As noted in the description, the phrase “\$တရုတ်” (literally translated as “\$China” or “\$Chinese”) could refer to Chinese citizens or ethnic Chinese (“chinese”), or the country or government of China (“china”). * It is not possible to assess the user's intent without the full text of the post. Information on the author (ie. influencer, known bad actor, multi-recidivist) and where the post was made (ie. newsfeed, problematic group, page, boosted post/ad) would also provide useful elements to assess intent. * It is not possible to assess how the post was interpreted or its impact without being able to review the comments the post generated. * We cannot assess, from the description alone, how Facebook's administrative action bot singled out the post for removal nor whether a human was involved in the decision. We note that: * While there was a rise in anti Chinese sentiment in the early days of the COVID-19 outbreak in Myanmar, attacks directed at China in the post-coup period have mostly been targeted at the Chinese

government and Chinese businesses, rather than individuals of Chinese nationality or ethnicity. This included content criticizing the Chinese government for preventing the UN from adopting sanctions against the military regime, as well as calls to boycott Chinese products after allegations that Chinese government-affiliated businesses had been providing surveillance equipment to the military junta. * Facebook shifted to automation by default for Burmese language content moderation in 2020, resulting in a significant increase in false positives and undue moderation. This negatively impacted freedom of expression at especially politically sensitive times (election, coup). * Facebook has been using country-specific slur lists for its moderation for several years. These slur lists are not public and Facebook has not provided any public information on how these lists are compiled, who compiles them or how regularly they are reviewed. As far as we are aware, the slur lists are also not open to a formal process of input and not subject to external audits. * Facebook has a history of using over-simplistic keyword searches for moderation, with no consideration for the context of the post or human assessments of the intent. Most notably, this resulted in the mass removal of content mentioning “chick-peas”, “table” and the verb “to cure” as Facebook added the keyword “ကုလား” (pronounced “kalar”) to its slur list in 2017. “Kalar” is a derogatory slur which was used intensively against people of Indian descent in the lead up to the Rohingya crisis. The font combination, however, is also a composite for the words above. * There remain a number of posts with the phrase “\$တရုတ်” on the Facebook platform. A small minority of the posts would, in our opinion, qualify as violations of the Facebook Community Standards. This suggests that automated enforcement on this phrase is inconsistent. * All posts with the phrase “\$တရုတ်” which remain on Facebook have in common the fact that they are commentaries of “shared posts”. There are no “native posts” containing the phrase. This suggests that Facebook is applying its moderation of this slur based on the *type* of content rather than the content *form* or *intent*. * Facebook’s existing appeal process offers users the ability to challenge moderation decisions with context but specify that such information may not be part of the review. On the basis of this case, we recommend that the Oversight Board: 1. Reconsider its approach to case description and publish the content in full -- consent may be sought from the user as part of the appeal process and the post anonymised if needed. Meta information on the author and where the post was made should be included as should a description of the response to the content, based on comments. 2. Seek public input on how content should be translated -- we are concerned that the professional translators hired by the OSB lack the necessary understanding of Myanmar’s internet subcultures to understand the content in context, and appreciate the use of coded language. 3. Require Facebook to provide more information on how the content under deliberation was detected by its systems, and whether a human being was involved in both the first review and the review of the user appeal. 4. Require Facebook to provide clarity on why their moderation of the phrase “\$တရုတ်”, which appears to be part of their Myanmar slur list, appears to only apply to “native posts” and not commentaries made on “shared posts”. We further recommend that the Oversight

Board issue the following recommendations to Facebook: 1. Provide public transparency on the process through which slur lists are drawn and updated 2. Commission independent audits of the slur lists on a regular basis -- these audits should involve consultations with local civil society and rights holders to ensure adequate understanding of the slurs, and their contextual usage 3. Provide public transparency on how slur lists are being used to feed into automated content detection and removals. 4. Formally notify users when their content was removed as a result of automated detection -- where possible, providing details on the phrase or combination of phrases that triggered the action. 5. Provide formal guarantees that **all** appeals are subject to human review conducted by native speakers with the ability to understand the content, context and the user justification. 6. Invest in more sophisticated systems for automated detection in Burmese and other minority languages. 7. Collaborate with and contribute funding/scholarships to groups developing language corpora for minority languages to speed up improvements in natural language processing.

Link to Attachment

[PC-10081](#)

2021-007-FB-UA

Case number

PC-10082

Public comment number

United States and Canada

Region

Mary Pat

Commenter's first name

Dwyer

Commenter's last name

English

Commenter's preferred language

The Brennan Center for Justice

Organization

Yes

Response on behalf of organization

Short summary provided by the commenter

We urge the Board to squarely address the use of automated tools to remove posts. Facebook has disclosed little information on how its automated tools identify content for removal. This case highlights the risks of overreliance on those tools and Facebook should not be permitted to continue blocking scrutiny of this key issue, especially in places like Myanmar where the platform is one of the few avenues for political debate.

Full Comment

Please see the attached comment.

Link to Attachment

[PC-10082](#)