Appendix J: Facebook Platform and API access

Introduction

1. Facebook Platform ('Platform') is a set of services, tools, and products provided for third-party developers to create their own 'consumer applications' (apps) and services that integrate with Facebook. Launched in 2007, Platform was designed to assist the development of its 'social web' and enable Facebook users to interact with their Facebook friends across the internet. It also aimed to provide the foundations for developers to build and grow applications that complemented Facebook's own products.

2. These developers have been able to interoperate with Platform through Facebook's provision of open application programming interfaces (APIs), providing third parties with the ability to access data and perform actions across platforms.

3. Over time, the developer ecosystem and Facebook's services have evolved as Facebook has grown. Specifically, Facebook told us that it has sought to balance its vision for Platform with a fast-evolving policy and regulatory landscape, in particular regarding privacy considerations, and the risk of third parties free-riding on its investments.

4. This appendix summarises the evolution of Platform and describes how third-party developers have been able to integrate their products into Facebook, as well as how the functionalities and terms of access have evolved over time.

The role of APIs

5. An application programming interface (API) is a piece of software that lets one program access and interact with another program, sharing data and functionality.[1] APIs provide a standardised way of integrating different businesses, optimising their level of interoperability and reducing barriers to enable a more agile and interconnected ecosystem.[2] Access to APIs can therefore support developers' ability to create new products and functionalities that complement existing services and improve competitive outcomes.

6. APIs are prevalent across the digital economy and can enable a multitude of use-cases, such as allowing a retailer to embed a map into its website or enabling consumers to compare the price of flights. To illustrate this using the

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[1] Government Service Manual, Technology, Application Programming Interfaces.
[2] CMO by Adobe, The Platform Economy: Why APIs And Integrations Are Crucial.

flights example, when consumers use a digital comparison tool to compare the price of flights, such as Kayak or Expedia, the platform will interact with the airlines' APIs to request and receive the relevant data from the airlines' databases before presenting this information to users.[3]

7.   Facebook maintains thousands of APIs across its applications, with each API typically providing access to a specific category of data or functionality. These APIs can be used for several purposes, but Facebook told us that their broad purpose is to enable third parties' systems to programmatically interact with Facebook and access data that users have chosen to share with those third parties.

8.   Facebook submitted that this enriches its users' experiences by bringing Facebook's social experiences to complementary third-party software apps, allowing third parties to create their own products, applications and experiences.

9.   We note Facebook can also use APIs that are not publicly available to connect its own products which could facilitate its ability to move quickly into new and expanding markets. In relation to such APIs, Facebook told us that from its perspective, the development of APIs used to perform internal operations would not be relevant to third-party developers.

10.   Facebook told us that interoperability of content is relevant as users go through each stage of (i) creating, (ii) sharing, (iii) discovering and (iv) consuming content. According to Facebook, a key part of its rationale for establishing Facebook Platform was to enable users to share experiences created on third-party apps back to Facebook. As discussed below, this has been enabled through API access.

Facebook Platform

Launch and rationale of Platform

11.   In 2007, Facebook launched Platform, which gave third-party developers working on apps access to Facebook technologies that could be incorporated into their products. The launch of Platform introduced a new distinct 'type' of customer for Facebook's services. In addition to the users and advertisers that had already been using Facebook, third-party developers could now use Facebook's services to help build and grow their products.

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[3] MuleSoft, What is an API?.

12.   Facebook submitted that it adopted an open platform ethos to create an environment for third-party developers to bring social experiences to users via complementary third-party apps, with the objective of unlocking innovation and enriching its users' online experiences.

13.   In the wider context of both the social media and tech industries, the launch of Platform was highly significant. As Mark Zuckerberg stated at the launch, prior to Platform, social networks were 'closed platforms'. By contrast, Platform meant that any developer worldwide could build full social applications on top of the social graph, inside of Facebook.[4]

14.   Articles describing the launch of Platform contrasted the unprecedented amount of access to developers that Facebook was granting with MySpace's strategy, which was described as closed and unhelpful to many application developers.[5,6]

15.   The addition of the developer 'side' of Facebook's social media platform introduced new network effects, with the potential to support the growth of Facebook's social media platform. These network effects are driven by the incentives of and interaction between the consumers, advertisers and developers that use Facebook's services:

- **Consumers:** Facebook submitted that the presence of third-party apps and content on a platform can enhance the user experience. The presence of numerous, high-quality, third-party apps may therefore make a social media platform more attractive to users.[7] This can lead to user growth.

- **Developers:** Facebook told us that developers benefit from Platform as it leads to greater user engagement. Facebook's large user base provides third-party apps with valuable access to consumers that can help build their product. Further information regarding the role and identity of third-party developers is provided in Box J.1.

- **Advertisers:** If the presence of third-party applications drives user growth, this may in turn make the platform more attractive to advertisers seeking a larger audience.

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[4] Facebook News (2007), Facebook Unveils Platform for Developers of Social Applications.
[5] TechCrunch article (2008), Facebook Platform, One Year Later.
[6] TechCrunch article (2007), Facebook launches Facebook Platform; They are the Anti-MySpace.
[7] And an increase in user numbers may then feed into the same-side network effects.

Box J.1: Who are third-party developers?

Third-party 'apps' that use the technologies available through Platform consist of a variety of digital products, including mobile apps, websites, messaging bots, games, Page management tools. Third-party developers are the people and companies that build these 'apps'.

These products are highly diverse in the services that they offer and may be built exclusively for use within the Facebook ecosystem or amongst wider ecosystems. They also integrate with Facebook to varying extents, from offering the standard 'Facebook Login' functionality to acting as a Facebook 'integration partner'. Examples of popular third-party 'apps' include:

- **Spotify**, which uses Facebook APIs to allow its users to share music with their friends by sending Facebook Messenger messages directly within the Spotify application.

- **Candy Crush**, which has used Facebook login.

- **Nike Run Club**, which uses Facebook's APIs to enable its users to share their achievements with their friends by posting directly to Facebook's News Feed, and contained a leaderboard inside the app which allowed a user to see where their Facebook friends also using the app were running.

- **Instagram** integrated with Facebook as a third-party developer, prior to its acquisition by Facebook in 2012.

It is noteworthy that the third-party apps seeking to integrate with Facebook may include some that compete with Facebook's own services. Others may offer services in areas where Facebook could compete in future eg the launch of Facebook Dating.

16. The launch of Platform also delivered other benefits for Facebook. For instance, Facebook told us that:

- The potential for users on these third-party apps to **share back content to Facebook** promotes a mutual commercial benefit between Facebook and the third-party app developers benefitting from Facebook's free business tools. As such, it could lead to more varied and interesting content for users, attracting a greater number of users and advertiser demand.[8]

- It envisaged that Platform could assist the development of a '**social web**', where people could interact with their Facebook friends no matter where

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[8] Attracting a greater number of users may also lead to a feedback loop whereby even more users are prompted to join, because of the same-side network effects that characterise social media platforms.

they went online, and developers could build and grow their apps. This would be facilitated through their 'deep integration' into Facebook's website, whereby the third-party apps would be as integrated into the platform's information flow and connections of relationships as Facebook's own applications.[9] In turn, this would also strengthen Facebook's 'social graph', which we have described in further detail within Box J.2.[10]

Box J.2: The Social Graph

The 'social graph' is a representation of the information, or data, held by Facebook. It consists of:

- **'Nodes'** – or individual 'objects', including users, photos, pages, comments.
- **'Edges'** – which are the connections between a collection of objects and a single object, such as photos on a page, or comments on a photo.
- **'Fields'** – data about an object, such as a User's birthday, or a Page's name.

Business Insider sought to illustrate the social graph in 2012 with the following picture:
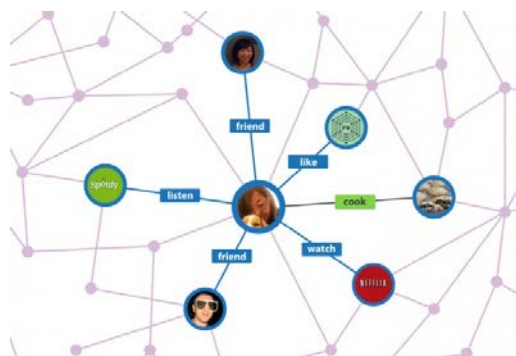
The term 'social graph' was popularised by Mark Zuckerberg at the launch of Platform in 2007, when he explained to third-party developers that they would be able to attain 'mass distribution through the social graph' through Platform. Facebook described the 'social graph' the network of real connections through which people communicate and share information.

Facebook's 'social graph' was distinct from those of its competitors at the time, because Facebook encouraged its users to recreate their existing networks of friends and family online. In contrast, other contemporary social media platforms saw consumers 'befriending' other users purely on the basis of the interaction they had within the platform.

Updates that Facebook later released for Platform, and third-party developers use of these updates, increased the richness of the data present in Facebook's 'social graph' over time.

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[9] Facebook News (2007), Facebook Unveils Platform for Developers of Social Applications.
[10] At Platform's launch, Mark Zuckerberg explained that '[Platform] is good for us because if developers build great applications then they're providing a service to our users and strengthening the social graph'.

Risks associated with Platform

17.   Facebook told us that the provision of access to Facebook's infrastructure and data through Platform to a range of third-party developers gave rise to a number of risks that could have a detrimental impact on Facebook's business and its users, including:

- **'Spammy' or bad apps**. Third-party developers desire to grow their apps may lead to excessive and/or automatic 'spam' postings, which reduces the attractiveness of the Facebook product.

- **Misuse of data**. The provision of access to user data also gives rise to the risk of third-party developers misusing this data, with associated concerns about the impact on users' privacy.

- **Free riding**. The open nature of Platform meant that third-party developers can access Facebook's infrastructure and data without paying any monetary fees. Facebook has expressed concerns that this may lead to developers free riding on its investments.

18.   To address some of these concerns, Facebook also engages in deprecations, which is the term used to refer to the removal of software, technology or APIs, as part of implementing updates to its platform. This can affect features or innovations that fail to achieve widespread adoption or gradually become less popular with users, such as Facebook's 'Poke' or 'Gifts' functions. It can also affect APIs that were previously available to developers.

19.   The act of deprecating APIs highlights another risk faced by developers who can develop a **dependency on Facebook**. Alterations made to Platform could require developers to make technical or even business model changes to their apps. Developers may also face the risk of Facebook competing with their product either presently or in the future, as described below.

Terms of access

20.   Facebook also sought to address some of the concerns highlighted above through its terms of access. In order to access any user data through APIs on the Facebook platform, third-party developers must adhere to at least the following policy requirements:

- The **Platform Policy** – which imposes obligations on developers regarding the use of features, functionality or data collection through Facebook's APIs, as well as the enforcement measures Facebook may take if an app or developer violates the Platform Policy.

- The **Commercial Terms** – which apply to all users accessing or using Facebook's services for any commercial or business purpose, including advertising, operating an app and using Facebook's APIs.

- The **Business Tools Terms** – which govern third parties' use of Facebook Business Tools and particularly: (i) the provision of personal data about third parties' customers and users to Facebook via Facebook Business Tools, such as Login; and (ii) the use of this data by Facebook.

- The **Terms of Service** – which govern all Facebook users, including third-party developers, and cover, for example, what content can be shared by users to Facebook and the permissions users give to Facebook regarding their content.

21. Facebook has submitted that the overarching purpose of these terms and conditions is to protect Facebook users and their data, and to ensure and promote a common minimum standard of quality for all features and functions that Facebook users may use and experience.

Evolution of Platform

22. In the years following Platform's launch, Facebook refined and developed the services available to its third-party developers. Notably, these updated services granted developers the capability to use Facebook's technologies outside of Facebook itself. These updates also further enhanced and expanded the extent to which Facebook was integrated with the wider web, as well as the data collected and stored in Facebook's social graph. This data can also be used for digital advertising purposes, as described in further detail within Appendix F.

23. The most significant of these updates included:

- **Facebook Connect**, launched in 2008, allowed users to 'connect' their Facebook identity, friends and privacy to any site. Connect gave third-party developers the opportunity to implement and offer features of Facebook Platform off of Facebook, similar to features available to third-party applications on Facebook.[11] This included the ability for users to access their friends across the internet, giving developers the ability to dynamically show users which of their Facebook friends already have

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[11] Facebook News (2008), Announcing Facebook Connect.

accounts on their websites.[12] Facebook Connect was highly successful, achieving 100 million users on web and mobile sites within a year.[13]

- **Social Plugins**, launched in 2010, which can be integrated by developers into their apps outside of Facebook, for instance when an external website features a 'like' button. Facebook explained to developers that social plugins provided a simple way of integrating the social graph into their website and provide a personalised experience to your users.[14] Social Plugins proved very popular, with over one billion 'likes' being received within 24 hours of its launch, and were integrated into over 50,000 websites within a week.[15]

- **Open Graph Protocol and Graph API**,[16] launched in 2010, which meant that any webpage could become part of the social graph.[17,18] At its launch, Mark Zuckerberg described Facebook's announcements as allowing Facebook and third-party developers to connect their graphs together.[19]

24. Despite Facebook's innovation on Platform and wider growth, Facebook told us that its business faced challenges in the early 2010s. The ongoing 'mobile revolution' was described as an enormous challenge by Facebook and Facebook told us that this period was characterised by increased uncertainty regarding its sustainability and business model, which we are told was reflected in the underperformance of its share price following its IPO.

25. In addition, Facebook told us that the mechanics of Platform have needed to evolve in accordance with a wide range of constantly developing commercial, policy and regulatory considerations. In particular, Facebook has needed to balance its vision for Platform with the following key considerations:

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[12] Other features included: 'trusted authentication'; 'real identity'; and 'dynamic privacy'.
[13] Search Engine People (2010), What is Facebook Open Graph?.
[14] Facebook News (2010), The Next Evolution of Facebook Platform.
[15] Social Technology Review (2010), Social Plugins: What are Social Plugins and How Can They Improve Your Web Site?.
[16] Graph API is the umbrella term used to describe the subset of APIs that enable third party developers to access the network of connections between people and/or between 'objects' (eg posts, comments and photos) that users have created on Facebook. Graph API was described by Facebook as a simple, consistent representation of data in the graph, so that all objects and APIs can be accessed via URLs.
[17] Facebook News (2010), The Next Evolution of Facebook Platform.
[18] Facebook told developers that The Open Graph protocol 'opens up the social graph and lets your pages become objects that users can add to their profiles. When a user establishes this connection by clicking Like on one of your Open Graph-enabled pages, you gain the lasting capabilities of Facebook Pages: a link from the user's profile, ability to publish to the user's News Feed, inclusion in search on Facebook, and analytics through our revamped Insights product'.
[19] TechCrunch (2010), 'I think Facebook just seized control of the Internet', accessed 26/05/2020.

- The **fast-evolving policy and regulatory landscape**, including the introduction of enhanced data privacy requirements globally and the GDPR.

- The detrimental impact of **negative user experiences and data leaks** by third-party apps.

- Striking the right **balance between an open platform and preventing free riding** on its substantial investments.

26. The following sections set out some steps that Facebook has taken to address concerns regarding its users' privacy, its policy and approach to competitors accessing Platform, as well as changes it has made to Platform's functionalities, including deprecations.

User privacy

27. Facebook told us that it views privacy and data protection as being key to safeguarding users' trust in its services. Since the launch of Platform, Facebook submitted that it sought to develop greater transparency and control over the sharing of information with third-party developers. For instance, it announced the following changes at F8 2014:

- **Graph API v2.0**, which restricted the data available to third-party developers through Platform, most notably the removal of access to users' friend data.

- **The App Review Process**, which was intended to ensure that data obtained by a third-party app is connected to a direct use case relevant to the app. Facebook told us that this was aimed at safeguarding users' information against data misuse, leaks and bad actors.

- An **enhanced version of Granular Data Permissions ('GDP')**, enabling users to make more granular choices about the types or categories of data they wanted to share with a third-party app.

28. Facebook submitted that the concerns about the misuse of user data, highlighted by the Cambridge Analytica incident which is described within Box J.3, prompted Facebook to make changes to its platform in order to secure greater user safety and data privacy.[20]

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[20] Mark Zuckerberg post (2018)

Box J.3: Cambridge Analytica

In 2013, Aleksandr Kogan, a Cambridge University researcher, created a personality quiz app which was installed by around 300,000 Facebook users who shared their data with the application. However, in contravention of Facebook's policies, the application also accessed and collected tens of millions of those users' friends' data which Aleksandr Kogan later shared with Cambridge Analytica, a political consulting firm.

In 2014, Facebook announced that it was changing its platform policies to significantly limit the data that apps could access. Facebook stated that these actions would prevent any app like Kogan's from being able to access so much data today.

However, following reports that Cambridge Analytica had accessed the data of tens of millions of its users, the Federal Trade Commission investigated whether Facebook had violated a 2011 agreement under which it was required to clearly notify users and gain 'express consent' to share their data. This investigation culminated in a settlement agreement in which Facebook agreed to pay a $5 billion penalty and comply with new restrictions and a modified corporate structure that will hold the company accountable for the decisions it makes about its users' privacy.

In the UK, Facebook was fined £500,000 by the Information Commissioner's Office (ICO) for its role in the Cambridge Analytica incident, noting that Facebook had let a 'serious breach' of the law take place. The fine was the maximum allowed under the old data protection rules that applied before GDPR took effect in May 2018.

29.   Whilst seeking to address users' privacy concerns, these changes also promised third-party developers a two-year stability guarantee with regards to Facebook's APIs.[21] This guarantee provided greater assurance to the third-party developers that they would not have to repeatedly redesign their applications to respond to changes that Facebook may make. However, it was also reported that these changes restricted third-party developers' ability to build certain categories of apps that could compete with Facebook's own services.[22]

The role of competition

30.   As described above, open APIs can support developers' ability to create new products and functionalities that complement existing services and improve competitive outcomes. However, in some cases, the third-party applications that use Platform's developer tools may compete with Facebook's own consumer services. Here we discuss the impact the competitive threat to

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[21] TechCrunch article (2014), Facebook API Guarantee.
[22] TechCrunch article (2014), Everything Facebook Launched at f8 and Why.

Facebook imposed by third-party apps using Platform appears to have had on Facebook's strategy.

31.   As noted above, Facebook told us that a risk of offering developer tools through Platform was that third-party developers may 'free-ride' on Facebook's 'free' business tools. Facebook submitted that this would fundamentally harm Facebook's own business proposition and reduce its incentives to continue to innovate.

32.   Until December 2018, Facebook's Platform policies included a 'non-replication' principle, similar provisions to which, Facebook submitted, are common across many digital platforms, such as eBay, Google, Pinterest and Snap. The main purpose of this principle was to prevent the 'free-riding' behaviour described above. For these purposes, Facebook considered its core functionality to principally relate to its News Feed and messaging functionality.

33.   Where third-party developers breach the terms and conditions of Facebook's Platform, Facebook can revoke access to its APIs. Facebook submitted that it applied this 'non-replication' principle in an extremely limited number of instances and removed this principle from its Platform policies on 4 December 2018.

34.   We have been made aware of instances where Facebook has revoked access to its APIs to specific third-party developers, including rival platforms. Specific incidents highlighted to us included:

- In 2012, Facebook disabled **Twitter's** access to its social graph and in 2018, Facebook disabled Twitter's access to the API that would allow for cross-posting from Twitter to Facebook.

- In 2013, after Twitter acquired **Vine**, Facebook discontinued the API for 'Find Contacts' access for Vine which had allowed users on Vine to easily begin using the Vine platform by finding friends that they already knew on the Facebook platform.

- In 2013, Yandex launched an experimental product called **Wonder**,[23] which was designed to search over activity data on Facebook and other services and relied on access to Facebook's Graph API. However, shortly after its launch, Facebook restricted Yandex Wonder's access to this API, citing a violation of its policy that prohibited the use of data obtained from Facebook in any search engine or directory without Facebook's written

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[23] Yandex blog (2013), Yandex Rolls Out Experimental Social Recommendation Tool – Wonder.

permission. Yandex told us that this clause should not have been applicable as the Yandex Wonder product was neither a search engine nor a directory. It is noteworthy that around the same time, Facebook launched a comparable product called 'Graph Search'.[24]

35.   We have also been told that in 2012, Facebook refused to give its users access to Twitter APIs which would allow for a better cross-posting experience for the user. This resulted in Instagram photos being rendered in a distorted fashion on the Twitter platform. Facebook still prevents images from rendering on messages cross-posted to Twitter, displaying instead only a link back to Instagram.

36.   In addition to the documents Facebook has provided to us during the course of this market study, we have also reviewed a cache of Facebook internal documents that were published online in November 2019. These documents were originally compiled to serve as evidence in a court case brought against Facebook in the United States.[25]

37.   Facebook told us that these documents provide an incomplete and inaccurate picture of Facebook's actual policies and business practices, being both historic and 'cherry-picked'. Notwithstanding this, the documents provide some evidence regarding Facebook's evolving approach to third-party apps using Platform that were competitive with Facebook's own consumer services. We outline some examples below.

38.   The documents indicate that initially, Facebook represented to third-party developers that it 'welcomed' third-party developers with competing applications, including those competitive with Facebook's own. Platform was designed 'so that applications from third-party developers [were] on a level playing field with applications built by Facebook'.

39.   However, this approach appears to have changed, as evidenced by the presence of and restrictions to third-party developers based on the 'non-replication principle'. An excerpt from a conversation log between Facebook employees included in the documents observes that, in addition to other 'macro trends' impacting Platform such as decreasing user trust, when Facebook 'started Facebook Platform, we were small and wanted to make sure we were an essential part of the fabric of the Internet. We've done that – we're now the biggest service on earth. When we were small, apps helped drive our ubiquity. Now that we are big, (many) apps are looking to siphon off our users to competitive services. We need to be more thoughtful about what

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[24] Facebook News (2013), Introducing Graph Search Beta.
[25] NBC News (2019), Leaked documents show Facebook leveraged user data to fight rivals and help friends.

integrations we allow and we need to make sure that we have sustainable, long-term value exchanges'.

40.   Other documents included in the cache illustrate the role that potential competition plays in decisions to integrate with Facebook. Emails between Facebook employees describe concerns expressed by FourSquare, Amazon and Comcast, that data these parties provide to Facebook will ultimately be used by Facebook to compete with their consumer-facing services.

41.   In addition to changes to the terms of access that it imposes on third-party developers, Facebook has engaged in full deprecations of APIs. These actions can also harm competition and are addressed in the following section.

Deprecations

42.   As described above, Facebook has benefited from operating an open platform. For instance, the addition of the developer side introduces new network effects and the potential to unlock innovation which can support the growth of Facebook's social media platform. It can also improve the user experience by leading to more varied and interesting content if users are able to share back content to Facebook, and it can strengthen Facebook's social graph.

43.   However, in addition to changes to its policies and terms of access, Facebook may engage in full deprecations which affect the functionalities or categories of data that can be accessed by developers. Facebook has told us that these actions are often taken to address concerns regarding the use and privacy of users' data.

44.   Given the importance of APIs in supporting the growth of other applications' userbases, the act of deprecating APIs highlights a risk faced by developers who can become dependent on Facebook. It can also have the effect of reducing the competitive threat to Facebook. Two particular deprecations appear to have harmed the ability of other platforms to grow and improve user experiences.[26] These are discussed below and addressed in further detail within Appendix W.

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[26] We note that other instances of Facebook deprecating developer services have been described elsewhere in this appendix. For example, when Facebook launched Graph API v2.0, it eventually 'deprecated' the earlier API version.

Friends invite

45.   Historically, third-party developers could enable their users to invite their Facebook friends (including friends not using the relevant app) to use an app through tools such as App Invites.

46.   However, this functionality has since been deprecated[27] which Facebook submitted was done in light of user demand for increased privacy, as well as policy and regulatory considerations relating to privacy and security. As such, the list of friends currently available to third-party developers, subject to specific user permission, comprises those friends who have also signed up to that app (ie 'in-app friends').

Publish actions

47.   The publish actions permission formed part of the Graph API and enabled third-party applications to automatically publish posts to Facebook as the logged in user so that users could easily share content that they have created on Facebook. As explained above, Facebook submitted that this ability to share experiences created on third-party apps back to Facebook was a key part of its rationale for establishing Facebook Platform.

48.   However, this functionality was deprecated in 2018 with Facebook attributing this decision to public demand to prioritise user safety and data privacy over its developer platform and users becoming increasingly concerned about third-party publishers not being sufficiently clear about when the app would make such posts to Facebook on a user's behalf.

49.   Facebook submitted that the risk associated with these considerations outweighed the benefits of automatic cross-posting from third-party apps to Facebook. As a result, and except for a few limited exceptions, it is no longer possible for third-party apps to post content relating to a user's off-Facebook activity to a user's Facebook News Feed, on behalf of that user automatically. Instead, users may use Facebook's Share dialogues product which, as illustrated in Appendix W, presents the post as a link rather than fully functional content.

Developer tools on Instagram and Messenger

50.   Facebook has also launched distinct and standalone developer platforms for each of Messenger ('Messenger Platform') and Instagram ('Instagram

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[27] Facebook archive, noting deprecation of App Invites and that it would be supported until 5 February 2018.

Platform'). Facebook explained that these developer platforms give third-party developers the ability to integrate Messenger and Instagram but are more limited than Platform.

Messenger Platform

51. Messenger Platform was launched in 2016, five years after the initial release of the Messenger App. Messenger Platform introduced the scope for businesses to communicate directly with consumers through bots, which can provide a range of functions from automated subscription content like weather and traffic updates, to customised communications like receipts, shipping notifications, and live automated messages, all by interacting directly with the people who want to get them.[28] Further information regarding Facebook Messenger is provided within Box J.4.

Box J.4: Facebook Messenger

Facebook first launched messaging features on the Facebook platform in April 2008. Three years later in August 2011, Facebook released Facebook Messenger, a standalone mobile messaging app.

Six months prior to the release of Messenger, Facebook had acquired 'Beluga', a young but popular group messaging service. The creators of Beluga contributed to the development of Messenger, with Messenger sharing some key features with Beluga at its launch eg the ability to mute messages. Beluga was then shut down in November 2011.

Facebook's existing user base helped drive the growth of Messenger, with all of Facebook's users automatically having access to a Messenger account. In 2014 the Facebook app for both Android and iOS began encouraging users to download the Messenger app. Then in 2016, Facebook removed users' ability to message each other on the 'Facebook' app and through accessing the Facebook website via a mobile browser. Facebook explained that this change was made to ensure that consumers had the best experience possible using Facebook products.

In recent years, private messaging has become one of the fastest growing means of communication, with Mark Zuckerberg stating that the future of communication will increasingly shift to private, encrypted services. Under these circumstances, Facebook Messenger, as well as WhatsApp, may become increasingly valuable components of Facebook's portfolio of consumer apps.

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52. Facebook submitted that Messenger Platform is used predominantly by businesses to manage their interaction with Messenger users. Facebook told us that the primary users of Messenger Platform are messaging aggregators,

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[28] Facebook News (2016), Messenger Platform at f8.

including developers that build chatbots or a graphical user-interface to create a flow of messages, or developers that create tools for Facebook Pages to manage interactions with Facebook.

53.   Facebook explained that the primary API that developers use to access data from the Messenger Platform is the Send API, which is key to the Messenger Platform's functionality. This allows developers programmatically to send simple text, structured template messages and file attachments, as well as media content. Facebook also stated that the Send API includes access to manage a Page's messaging, as well as access to user profile fields for Messenger users messaging the Page.

54.   Facebook internal documents indicate that Messenger as a forum for business to consumer communication is projected to grow strongly.[29] Documents note that whilst these communications may begin as organic interactions, Facebook views there is potential to monetise these services. With respect to Facebook's own business, Messenger has features which have the potential to be 'multi-billion dollar' ads revenue streams.

Instagram Platform

55.   Instagram Platform operates in a similar manner to Facebook Platform. It enables third-party developers to integrate with Instagram to manage content, such as photos, videos or comments, and measure social interactions with other Instagram users.

56.   Instagram has its own Graph API which enables developers to interact with the Instagram Feed and carry out certain actions, such as 'Sharing to Feed', which allows users to share content they created in their app to their Instagram Feed.[30] In addition, developers can use can use 'Sharing to Stories' to allow users to share content created in their apps as an Instagram Story.[31]

57.   Through Instagram Platform, Instagram also allows its business accounts to integrate with Instagram Shopping to use the features to sell products to Instagram users.[32] The Shopping API enables developers to see certain information about an Instagram business account on Instagram Shopping,

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[29] As part of a growing move towards business to consumer communication on Facebook's messaging platforms: Messenger and WhatsApp.
[30] Facebook for Developers, 'Sharing to Feeds', accessed on 5 June 2020.
[31] Facebook for Developers, 'Sharing to Stories', accessed on 5 June 2020.
[32] Facebook for Business, 'Create a mobile shopfront with Instagram', accessed on 5 June 2020.

including whether the account has followed the relevant review process or is in the process of being reviewed.

Conclusion

58.   The launch of Platform added an additional 'side' to the Facebook service, through which many developers began to interoperate and integrate their products into Facebook. This has brought many benefits to Facebook.

59.   It has introduced new network effects and unlocked innovation which has led to more varied and interesting content on its platform, supporting the attractiveness and growth of its core product. Furthermore, it has strengthened Facebook's social graph and led to many third-party developers relying on Facebook to grow their userbase. In turn, this has created a dependency on the Facebook platform.

60.   However, since its launch, the mechanics of Platform have evolved in accordance with a wide range of developing commercial, policy and regulatory considerations. In particular, Facebook told us that it has sought to balance its vision for Platform with the introduction of enhanced data privacy requirements, the impact of negative user experiences and data leaks by third-party apps, as well as preventing free riding on its investments.

61.   Faced with these challenges, Facebook has frequently updated the policies dictating its terms of access to Facebook Platform. It has also prohibited specific applications from accessing Platform and it has engaged in full deprecations which have limited the ability of developers to access specific data as well as carry out certain functions. These changes have had an impact on the ability of other applications and platforms to compete with Facebook. We have considered the impact of these changes on competition in further detail within Chapter 3 and the potential for remedies in Appendix W.