I Peter Leversha would like to herby refute the findings from ACMA that has led to the unecessary creation of this legislation (Communications Legislation Amendment Bill 2023 [https://www.infrastructure.gov.au/node/36455]).

I have listed each finding individually and put my personal response under each finding.

Source:
 [Adequacy of digital platforms disinformation and news quality measures.pdf (acma.gov.au)](#)
(Apendix A)

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List of findings:

Finding 1:

Most Australians are concerned about, and have experienced, online misinformation. Higher exposure is associated with heavy use of digital platforms, disproportionately impacting younger Australians.

My response:

Misinformation as defined by who? It does not concern me in the slightest.

It is not the job of goverment to decide what information impacts young people, that is the job of their parents.

Finding 2:

Access to authoritative and trusted sources of news and information is an important mitigation against misinformation. Those that rely on social media as a main source of news have a greater likelihood of being misinformed about COVID-19.

My response:

News sources are not supposed to be 'authoritative'. They are supposed to be 'informative'.

Main stream media has lost it's trust from the public because they wouldn't address head on issues that the public were concerned with with regards to COVID 19.

Social media has been the main source of news for many, because the main stream media has not addressed concerned in any adequate fashion.

Finding 3:

Given its nature and the ongoing challenges in accessing relevant data, the true scale and volume of misinformation in Australia is currently unknown.

My response:

It is not possible to decide what is 'misinformation', let alone classify it as such.

It is subjective and as we found out with COVID 19, the information was changing 'at the speed of science'.

Finding 4:

Australians report seeing the most amount of misinformation on large platforms such as Facebook and Twitter. However, private messaging services and smaller platforms with less strict content moderation

policies, like Telegram, are also being embraced by conspiracy-oriented communities.

My response:

According to who? The WHO (world health organisation)?

It has been shown time and time again that they have a financial interest in ensuring that vaccination programs were rolled out FAST despite the lack of safety data. This is corruption at the highest level.

The fact the Austrailan government with it's vast resources rushed into this without doing it's own long term research first, is quite frankly embarassing.

Finding 5:

Misinformation typically stems from small online conspiratorial communities, but can be amplified by influential individuals, digital platform design, as well as the media.

My response:

The greatest misinformation was actually peddled by main stream media, goverment and public officials.

But what I call 'misinformation', you would call 'information'.

Can you see the problem here?

It is subjective from your own personal point of view.

Finding 6:

Conspiratorial content is designed to be highly engaging, fuelling outrage, and building on a sense of community. The confluence of conspiracy theories around COVID-19 has created more paths to online misinformation.

My response:

This is an opinion, not a provable fact.

Finding 7:

There is some evidence of co-ordinated inauthentic activity surrounding popular misinformation narratives in Australia. Those who spread misinformation often seek to reframe global conspiratorial narratives, like QAnon, in a local context.

My response:

If what someone is saying is what you call 'misinformation', the best response is to counter it with a thorough investigation. Not hide it.

Finding 8:

Misinformation narratives can result in a wide range of acute and

chronic harms, including the erosion of trust in authoritative sources and democratic institutions over time.

My response:

Again with the 'authorative'. Government is supposed to serve the people, not 'rule over the masses'.

Trust is built through transparency, which was severly lacking with the entire COVID 19 event.

Finding 9:

The real-world consequences of misinformation have been readily apparent over the past 18 months: inciting violence, undermining official health advice, and causing tangible financial impacts on governments, industry and consumers.

My response:

The only violence from COVID 19 was initated from the Victorian Force. I cannot call them the 'Victorian Police Force' as their actions at the Shrine of Rememberance has led to to losing my respect for them.

The offical health advice was never released to the public, we have been calling for it since the start of the pandemic, to this day, I have no idea what data led to the massive goverment over reaction.

Finding 10:

Most Australians are aware of platform measures to remove or label offending content, but few have direct experience. Early evidence suggests these steps have been somewhat effective in reducing amplification of misinformation on particular platforms.

My response:

These were/are actually embarrasing. The information shown on the platforms was so far removed from reality that it actually showed the 'offical government line' which in most cases, was embarassing for the government who were so far behind on the latest information it was ridiculous.

Finding 11:

Australians see the issue of misinformation to be one of joint responsibility – split between individual users, platforms, and government. There is some scepticism in the ability of platforms to self#regulate, and concern about government's role in regulating speech.

My response:

The government should not hold a role in limiting speech at all.

I don't even believe 'incitement' is a real thing anymore.

We have such advanced information available, people have easy access to higher quality information.

Finding 12:

Information on the effectiveness of platform measures is limited, and

more needs to be done to better understand what measures work and to monitor the effectiveness of platform moderation activities.

My response:

This is a complete waste of time, effort, resources and money.

The money would be better spent improving the lives of the disadvantaged.

Finding 13:

In leading code development, DIGI successfully managed a novel, complex and time-sensitive project, navigating a range of competing interests across a disparate group of stakeholders that included both members and non-members of DIGI.

My response:

I have no response, I don't know what DIGI is.

Finding 14:

DIGI undertook a meaningful public consultation process on its draft code, generating a range of feedback from academia, industry, and parts of civil society, which visibly informed the final code.

My response:

I have no response, I don't know what DIGI is.

Finding 15:

DIGI could have improved its consultation process with greater publicity, including promoting it through existing public communications channels and engagement with the media.

My response:

I have no response, I don't know what DIGI is.

Finding 16:

DIGI dealt with stakeholder feedback in a relatively open and transparent manner. However, the significant change in scope meant it would have been best practice to provide stakeholders a further opportunity to comment on the final drafting prior to finalisation.

My response:

I have no response, I don't know what DIGI is.

Finding 17:

The bulk of 'major platforms' in Australia have signed up to the code. As such, it should be regarded as an industry-wide initiative.

My response:

I have no response, I don't know what DIGI is.

Finding 18:

DIGI should continue to encourage other popular platforms, like Snapchat and Reddit, to sign up to the code, even if they do not meet the proposed threshold of one million active monthly users. DIGI should actively publicise the involvement of any additional code signatories as soon as practicable after their signing.

My response:

I have no response, I don't know what DIGI is.

Finding 19:

Industry participants should consider the role of private messaging platforms and smaller alternative platforms in the amplification of disinformation and misinformation and explore options for how these platforms could be included within the code framework.

My response:

If you ban private messaging, or limit the way in which it can be used.

You might find the public backlash over-whelming.

Finding 20:

DIGI has developed an outcomes-based code that has allowed platforms with a range of business models to sign up to a single code.

My response:

That sounds quite Orwellian.

Finding 21:

The code objectives and principles meet the government objective of striking a balance between encouraging platform interventions and protecting freedom of expression, privacy and other rights

My response:

Government should stay out of peoples private lives.

This is concerning.

Finding 22:

The code should be strengthened by taking an opt-out approach. Opting out of an outcome should be permitted only where the outcome is not relevant to the signatory's services. Signatories should provide adequate justification when opting out.

My response:

This sounds like government or public service people might be able to work around the software.

A rule for thee, but not for me.

Finding 23:

The code covers both disinformation and misinformation. This is one of the key strengths of the code, and is an improvement on the current EU Code.

My response:

Not interested.

Finding 24:

The definition of harm in the code is too narrow to provide adequate safeguards against the full range of harms caused by the propagation of disinformation and misinformation.

My response:

There is no such thing as misinformation or disinformation.

It is a matter of opinion.

Finding 25:

Private messaging services should be included within the scope of the code as these are known vectors of disinformation and misinformation. These should be included with appropriate caveats on the right to privacy.

My response:

If you ban private messaging, or limit the way in which it can be used.

You might find the public backlash over-whelming.

Finding 26:

The code should clarify that the exclusion of professional news content applies only to the application of counter-misinformation measures. It should also clarify that news aggregation services are in scope.

My response:

Your going to destroy private online content creators.

Finding 27:

The treatment of paid and sponsored content should be clearer in the code. This should include a clear definition of sponsored content.

My response:

The government and main stream media should outline which policy or opinions were sponsored by vaccine manufacturers.

Finding 28:

In addition to improving public awareness of the source of political advertising, the code should also cover the source of issues-based advertising.

My response:

The labor party has paid trolls that haunt the comment section.

You really want to shut down your own workforce?

Finding 29:

The output-focused framing of several objectives and measures may encourage reporting to focus on outputs rather than progress towards code outcomes.

My response:

Waste of money.

Finding 30:

The code should include industry-wide frameworks for the development and implementation of individual platform measures. Examples could include frameworks to establish:
> criteria for the assessment of harm
> criteria for assessing news and information quality
> processes for the exchange of information between platforms on disinformation and misinformation risks
> commitments to address the propagation of disinformation and misinformation via platform advertising channels
> commitments to address the risks of propagation via platform algorithms and architecture.

My response:

The attack on free speech is clear in this finding.

Who judges 'What is harm?' or 'what is quality news?'.

And who gives them the right to be the judge?

Finding 31:

The code provides a high-level code administration framework. Given that detailed arrangements for code administration, compliance with the code, and consumer complaints are still under development, the ACMA's ability to assess their practical effectiveness is constrained.

My response:

Waste of money.

Finding 32:

The code should include a framework setting out principles for the structure and operation of the sub-committee to provide greater transparency and accountability.

My response:

Waste of money.

Finding 33:

The reporting template provides a workable foundation for the reporting guideline. Reporting should incorporate adequate data to measures performance against KPIs under each outcome; detailed action plans to address areas identified for improvement; and a clearer distinction between measures (that is, outputs) and the effectiveness of these measures (progress towards outcomes).

My response:

Waste of money.

Finding 34:

The proposed 12-month review will provide an opportunity for findings from this report, and other developments, to be incorporated into the code.

My response:

Waste of money.

Finding 35:

The lack of detail on code administration matters, including on the operation of the sub-committee and guidelines for future code reporting, has limited the ACMA's ability to undertake a full assessment on the likely effectiveness of the code.

My response:

Foreign companies do not have to show you their 'code'.

If I was Elon and I read this, I would cut the Twitter service to Australia in it's entirety.

Finding 36:

On the whole, signatories have met the initial reporting requirements set out in the code.

My response:

Suckers.

Finding 37:

For the most part, signatories have provided appropriate explanations where they have not opted-in to specific commitments.

My response:

No comment.

Finding 38:

A more uniform approach to reporting would assist in cross-platform assessment and increase transparency of platform measures and performance.

My response:

Waste of money.

Finding 39:

For future reports, signatories should clearly specify the products and services covered by the code, and justify any major exclusions.

My response:

Waste of money.

Finding 40:

Signatories have a wide range of measures in place to address the problems of disinformation and misinformation and to improve the quality of news and information on their services. They also demonstrate responsiveness to significant changes over the last 18 months, as well as to public and government calls for stronger action.

My response:

Waste of money.

Finding 41:

It is expected that signatories will develop more Australia-focused measures over time.

My response:

You have killed the chance of any Australian software developers competing with these large tech firms by creating this legislation.

It is becoming near impossible to compete in the software market.

Larger companies can comply with your rubbish, but smaller companies will be legislated out of the market.

But I guess that is the plan. Look after the big corporations, screw the little guy.

Finding 42:

In general, the reports are heavily focused on current measures and past actions, and signatories have provided little systematic information on future initiatives. In some cases, it is not clear to what extent certain measures will contribute to the achievement of the code outcomes under which they have been reported.

My response:

Waste of time, effort, energy and money.

Finding 43:

There are inconsistencies in the interpretations of key terms between signatories, which are drawn from pre-existing definitions from their internal, often global, policies. This makes it difficult to interpret and assess performance and to make industry-wide comparisons.

My response:

Waste of time, effort, energy and money.

Finding 44:

A harmonised template would assist in comparing initiatives across platforms. It would also allow clear reporting on additional information beyond the requirements of the code.

My response:

Waste of time, effort, energy and money.

Finding 45:

Signatories have provided a large range of information on the actions they have taken to address misinformation, disinformation and news quality and to invest in collaborative initiatives. This demonstrates signatories' commitment to addressing these issues.

My response:

Waste of time, effort, energy and money.

Finding 46:

The information signatories have provided is heavily focused on platform outputs and on volumetric data. Reporting lacks systematic

data, metrics or key performance indicators (KPIs) that establish a
baseline and enable the tracking of platform and industry performance
against code outcomes over time.

My response:

Waste of time, effort, energy and money.

Finding 47:

Reports provide some data on the Australian context, but this is often
piecemeal or not directly related to actions under the code. Reporting
should include Australia-specific data and signatories should establish a
reporting regime against the Australian code.

My response:

Waste of time, effort, energy and money.

Finding 48:

Reporting lacks trend-related data. Trend-related data would contribute
to a greater understanding of the extent and impact of disinformation
and misinformation in Australia.

My response:

Waste of time, effort, energy and money.

This assumes that 'disinfomation and misinformation' are real concepts.

As you can tell I am against all the assumptions (findings) in this report that led up to the creation
of this legislation.

The government should not have a role in deciding what is information or disinformation.

This will lead the country down the very dark communist path that we have seen cause the death of
millions time and time again.

A better response for the government to consider is to actually look at what messages have been put
out there, then offer a better counter argument.

The argument put forward on COVID 19 vaccines was an absolute joke.

Opposing voices, were silenced and ridiculed, even though we now know that the majority were
accurate.

None of the issues were even debated in parliament, because parliament despite their being a nation
wide 'pandemic' barely even sat.

I apologise for any spelling/grammar errors and I would of spent more time and researched this
more thoroughly, but it is due tonight according to the website.

Regards,

Peter Leversha

Dated the 6th of July 2023

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P.s. The digital service standard website link did not work, so I could not compare this document to the standard to see if it complies.