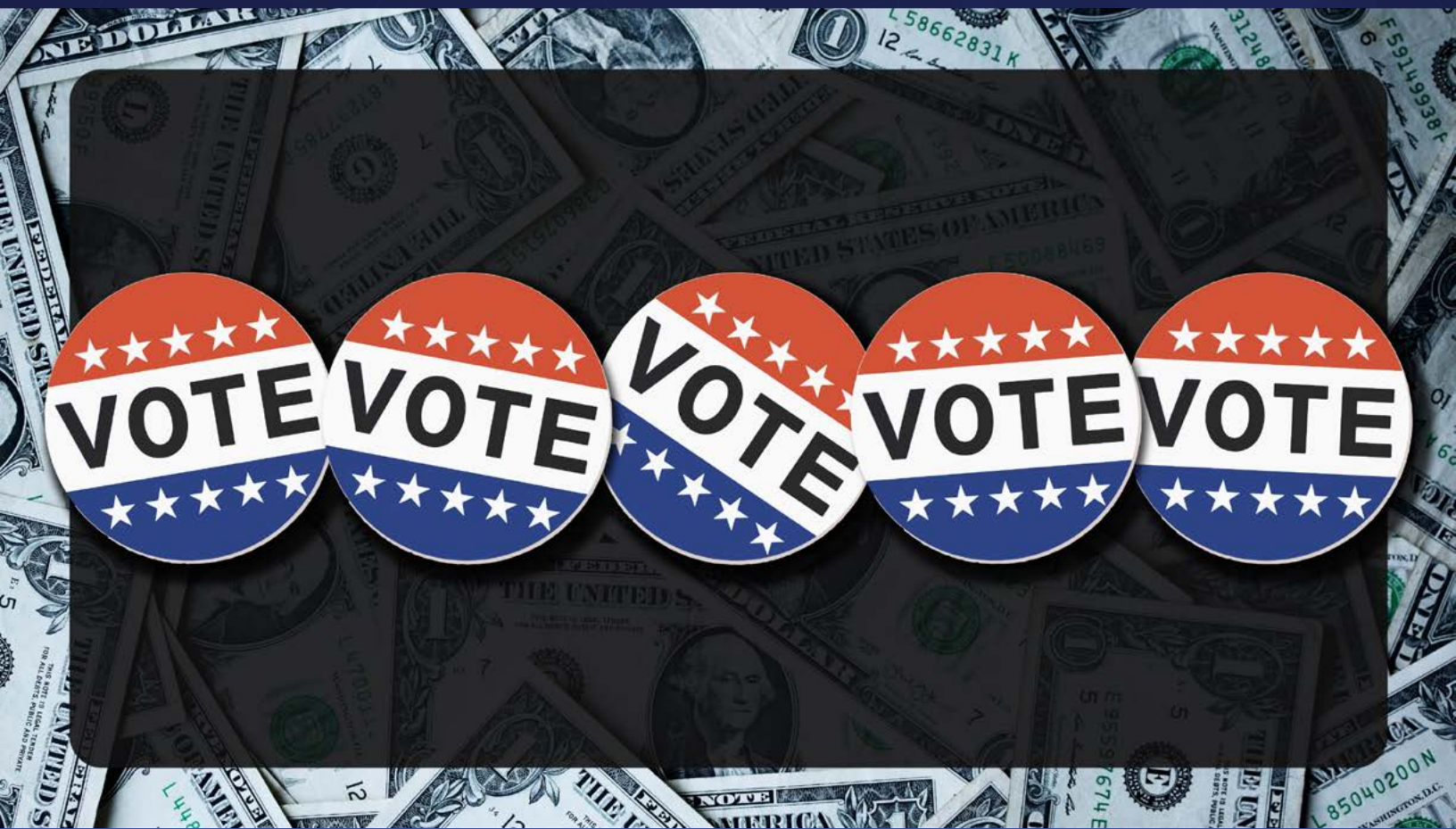# Breaking Blackout Black Boxes:
Roadblocks to Analyzing Platform Political Ad Bans

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Executive Summary and Recommendations

Anticipating that digital advertising could be a significant source of misinformation during the 2020 US general election, many of the major digital platforms revised their policies on political advertising. While Twitter, Spotify, Tik Tok, LinkedIn, and Pinterest banned political ads months ahead of the election, the two largest purveyors of digital ads, Facebook and Google, prohibited all political ads only after voting ended.

Whether digital ad platforms are large or small, banning political ads is a significant step. Campaigns and political organizations spend billions of dollars on advertising each cycle on what is recognized to be an important avenue for protected political speech. When Facebook and Google announced their bans—Facebook beginning with a prohibition on new political ads in the last week of the election—digital strategists, academics, and commentators wondered what influence these interventions would have across civic life.

However, assessing the efficacy and implications of these actions is difficult. While federal law requires that campaigns and political organizations report information about coordinated and independent spending to the Federal Election Commission (FEC), these data are limited. First, current interpretation of the law requires little specificity or standardization in reporting. The law permits organizations to use labels as broad as "media," and this categorization obscures much about how and where money is spent. Similarly, organizations are largely free to label transactions as they see fit, leaving, for example, Facebook ad purchases to be described as everything from "digital advertising" to "paid media-online," to "web ads," to "ads." Second, although the FEC imposes strict filing deadlines on political organizations, it does not provide a clear timeline for releasing data, and the FEC releases data in a piecemeal fashion. This uncertain haphazard release schedule complicates the work of researchers seeking to analyze election data to make informed assessments about the impact of platform interventions on political speech.

Most importantly, however, federal law does not require political organizations to report how advertising agencies or consultancies spend money on their behalf. Our analysis of data from the last month of the 2020 election estimates that campaigns directed 94% of their advertising spending through consultancies (see Figure 1 below). This means that for most election-related advertising spending, all we can see is that political organizations paid consultancies, but we can't see how consultancies spent that money. We can see money going in, but we can't see money going out.

Several social platforms have filled in some of these gaps by maintaining archives of the political ads they run. However, these archives are neither regulated nor standardized, and there remain significant limitations to the data that platforms archive, the search tools they supply, and the access they grant.

These disclosure gaps create a black box around advertising spending that makes it

difficult to assess how consultancies, acting on behalf of campaigns and political organizations, adjusted ad buys in response to platform ad bans. Similarly, these gaps limit campaigns' ability to develop evidence-based strategies for responding to ad bans in future elections. For example, heading into the Georgia run-off election on January 5th, we had little understanding of the implications of policy changes by the two biggest providers of digital political ads. Looking toward upcoming municipal elections and the 2022 midterms, it would be helpful to understand the impact of platform political ad bans. However, this task is more difficult because of holes in the data.

According to recent complaints filed with the FEC, some campaigns and political organizations are using the lack of transparency of spending by advertising consultancies to launder illegal campaign spending. Having better disclosures could prevent, and limit campaign finance violations.

We suggest the following revisions to existing regulations and policies that could benefit future analysis of political ad bans.

- **Federal law should require political advertisers to be more transparent.** The FEC should amend Advisory Opinion 1983-25 to require political organizations to disclose how ad agencies and consultancies spend money on their behalf. Legislation, such as amended versions of the Honest Ads Act or the Political Accountability and Transparency Act, could also establish these additional reporting requirements. To mitigate the reporting burden these changes will impose, we recommend that the FEC hold a series of workshops to explore how platforms, advertisers, and the FEC can collaborate to automate disclosures.

- **The FEC should improve its data disclosures to facilitate political advertising research.** The FEC should provide a clear timeline for data release and announce modifications to the archive. It should also establish a limited number of specific spending descriptions and a means of standardizing vendor names across filings.

- **Platforms should modify political ad libraries to increase transparency.** Platforms should standardize data types and variable names, improve search functionality, and increase user access.

- **Federal law should require, improve, and standardize platform ad archives.** Congress should consider requiring all major types of digital political ad providers to maintain standardized, publicly accessible, and searchable ad databases. It could achieve this result by modifying the Honest Ads Act, a bill focused on ad transparency by tech platforms.

A Brief History of Political Ad Bans

On October 30, 2019, Jack Dorsey announced that Twitter would ban nearly all political ads. Dorsey cited the risk that paid targeted political advertising poses to "civic discourse," in particular by spreading "misleading info." But he also he justified the ban using a slogan that Twitter would repeat regularly, "We believe political message reach should be earned, not bought."

While Twitter was perhaps the most prominent platform to ban political advertising, it was not the first. LinkedIn, Pinterest, and Tik Tok had already banned all political ads. At the end of 2019, Spotify followed suit. A Spotify spokesperson told Reuters, "at this point in time, we do not yet have the necessary level of robustness in our processes, systems and tools to responsibly validate and review this content." Later in 2020, Amazon joined in, banning all political ads from its sponsored products and brands.

Heading into the general election, Facebook and Google faced calls to amend their political advertising policies. On September 3, Mark Zuckerberg announced in a Facebook post that the company would not accept new political advertisements in the final week of the election. Zuckerberg said that while he believed "the best antidote to bad speech is more speech," he recognized that "in the final days of an election there may not be enough time to contest new claims" made in political ads. In response, Facebook permitted ads submitted and viewed before October 27 and allowed advertisers to rerun and adjust the targeting of those ads in the final week. However, it determined that all ads running in the final week of the election campaign would be visible in the Facebook Ad Library, where everyone, including fact-checkers and journalists could evaluate them.

Three weeks later, on September 25, Google informed advertisers that it would stop showing all political ads on its products—including both Search and YouTube—after the election. News outlets obtained copies of the email sent to advertisers and reported that the ban included election-related ads and those that targeted users based on election-related searches. Google justified the ban by classifying the election as a "sensitive event," about which it had an existing policy forbidding advertisements. A year previously, Google had limited targeting of political ads to "general categories: age, gender, and general location (postal code level)."

Similarly, Facebook stated on October 7th, that it would stop all "social issue, electoral or political ads in the US" following the election on November 3rd in order to "reduce opportunities for confusion or abuse." The statement acknowledged that election results might be delayed as a result of the pandemic and increased mail voting.

One week after the general election, on November 11, Facebook extended the ban. Noting the continued ban might influence the Georgia runoff, Rob Leathern, Director of Product Management for Ads at Facebook, briefly explained:

> We do not have the technical ability in the short term to enable political ads by state or by advertiser, and we are also committed to giving political advertisers equal access to our tools and services.

As the Georgia run-off election approached, Google and Facebook again reevaluated their policies. Google announced in another email to advertisers that it was removing the ban on December 10 and re-authorizing all types of political and social issue ads.

Five days later, on December 15, Facebook announced that it would lift the ad ban the next day only for the Georgia election, allowing authorized advertisers to run ads "with the purpose of reaching voters in Georgia about Georgia's runoff elections." They stated that this decision was in response to "feedback from experts and advertisers across the political spectrum about the importance of expressing voice and using our tools to reach voters ahead of Georgia's runoff elections."

Notably, Facebook said, "we will continue to prohibit any ad that includes content debunked by third-party fact-checkers or delegitimizes the Georgia runoff elections." While Facebook had previously stated that they would prohibit ads that made false claims about voting processes, the census, voter fraud, election results, or voting safety, this appeared to be the first time Facebook set a policy of refusing ads that included content rated false by independent fact checkers.

Reactions To, Concerns About, and Initial Analyses of Platform Political Ad Bans

As platforms announced restrictions on political advertising, scholars and commentators raised four broad concerns:

Suppress Political Speech

First, and perhaps most importantly, some expressed concern that in banning political ads, platforms would suppress an important form of political speech. Although the First Amendment imposes limitations on the government's ability to regulate political advertising – even commercial speech is entitled to First Amendment protection – it does not prevent companies from regulating and restricting the advertisements they distribute. Yet, commentators and digital strategists worried that bans would also inhibit efforts to mobilize supporters and activists, raise money, and distribute important information about voting processes and social issues.

Have Unequal Effects

Some worried that political ad bans would disadvantage political challengers and those with small organic followings and fewer resources. Politicians with large followings and reliable means of generating news attention do not have to rely on paid advertising. Donald Trump is the paradigmatic case. Before he was banned from Twitter and Facebook, he had amassed 88.5 million Twitter and 35 million Facebook followers, and had demonstrated a knack for drawing near constant coverage from political reporters. Prohibiting political ads was unlikely to stop prominent politicians from spreading disinformation. However, it may have prevented challengers from using paid and promoted ads to respond to or counter disinformation.

Analysts and strategists on both the left and right worried that ad bans would un-equally affect their campaigns. Reacting to Twitter's ban, Brad Parscale tweeted that the ban was "yet another attempt by the left to silence Trump and conservatives." However, given the organic reach that Trump enjoyed on Twitter, it is unclear how Parscale imagined the ban was narrowly targeting conservatives. Democratic Senator Chris Murphy told Politico that Facebook's ad ban "is effectively amounting to voter and donor suppression" because of Democrats' reliance on Facebook for fundraising.

Limit Important Factual Information

Platform ad bans do not only ban socially undesirable political ads; they ban desirable ones too. By prohibiting all political and social issue advertising, platforms limit the ability of advocacy organizations and campaigns to supply basic information about voting. Paid and promoted messages about voting locations, mail-in voting proce-dures, ID requirements, or other voting processes were banned along with campaign advertisements.

Facebook attempted to address this concern by hosting their own "Voting Information Center." While the center supplied accurate voting information, there remained con-cern that it was ineffective when paid voting mobilization efforts remained prohibited. It is also not clear whether Facebook users read the content in the Voting Informa-tion Center, and if they did, whether it had any positive educational value for them. As discussed above, others noted that ad bans—in particular Facebook's ban on new ads in the final week of the election—would limit organizations' ability to correct both on- and offline misinformation in the final days of the election. For example, had the Facebook ban occurred at the same time in 2016, groups would have been able to run ads about James Comey reopening the Clinton email investigation but not about his subsequent finding that there was no wrongdoing.

Some people were concerned that platform ad bans would also limit the ability of so-cial advocacy organizations to disseminate their messages, raise money, and mobilize support and action. As bans covered all political and social issue ads, non-profit orga-nizations might have been collateral damage. Perhaps most importantly, some ex-perts worried that the ad bans would impede COVID-related public health messaging. For example, NPR interviewed one public health official in Los Angeles who described how she had used targeted paid advertisements about COVID to reach certain vul-nerable populations—advertisements that were and continue to be banned on many platforms.

Be Ineffective

Finally, many commentators worried that ad bans may be ineffective in making a meaningful difference in the spread of misinformation about the election. Banning political ads would not address the spread of disinformation in organic content. Goo-gle's ban did not start until after the general election; in a year in which many people voted before election day, Facebook's decision to limit its ban to the final week of a campaign may have diminished its effect.

Given that Facebook only prohibited new ads in the last week of the election and campaigns could reactivate existing ads (as long as they had at least one impression), campaigns likely uploaded all ads they wanted to run in the final week in the days before the ban took effect. An analysis by MIT Technology Review of Facebook Ad Library data, suggested that while many campaigns continued spending money on Facebook ads until election day, "the last-minute push to register Republicans dominated the political ads on Facebook in the last few days before the election." One organization, Register to Vote Republican, spent $3.3 million on Facebook ads in the last week of the election. They noted that most of these GOP ads were "activated" on Facebook on October 25th and 26th, days before the ad ban began. This evidence suggests that instead of making any meaningful difference to quality or quantity of ads produced, the ban may have only shifted the ad spend to slightly earlier in the election.

An analysis by Global Witness using Facebook audience data from the NYU Online Political Ads Transparency Project saw a slight increase in viewership of Facebook political ads after the ad ban took effect, leaving them to conclude that the ban had "hardly any effect" on viewership. However, without knowing how viewership would have changed in the last week without the ban, it is difficult to assess what impact Facebook's ban had on ad views in the final week of the election.

Relatedly, an initial analysis by the Campaign Legal Center found that, despite the ad bans during the beginning of the Georgia runoff, Republican super PACs continued to spend heavily on digital advertising. Notably, much of this spending appears to have shifted to platforms and ad providers that do not maintain political ad archives, such as demand side platforms (DSPs), prominent websites, or streaming platforms, which means researchers have few tools to track and understand the content and scope of those advertising campaigns.

Given that Facebook's policy was meant to ensure that Facebook, fact checkers, and journalists would all have sufficient time to fact check ads loaded into the Ad Library, a significant dump of ads in the days before the ban went into effect actually made it harder for to assess political ads. In normal times, third-party fact checking is a limited resource: there will always be more claims than fact checkers can cover. Fact checkers also rarely assess political ads, often prioritizing news stories, social media posts, or statements and claims made by prominent people. Amid a national election with billions of dollars being spent on ads across the country, there is little reason to believe fact checkers were able to review even a small portion of the ads.

While there has not yet been any systematic analysis of the ad content that circulated in the final week of the election, there is little reason to think that ads submitted before the ban went into effect would be more factual. Indeed, there is an indication that some right-wing outlets that regularly spread misleading and hyper-partisan content were able to circumvent the ad ban. One investigation found that The Daily Wire was able to use an exception to the ad ban meant for news outlets to run ads in the final week of the election. Another found that PragerU was also able to post political ads and "appears to have just slipped through Facebook's cracks."

Political ad bans rely on platforms being able to classify and detect political and issue-based ads. However, the [NYU advertising observatory](#) recently found that nearly 10 percent of political advertisements located in the Facebook Ad Library between May 2018 and June 2019 were not properly classified and lacked necessary disclosures. While we know less about other platforms, there may be similar gaps in other platforms' systems.

Remaining Questions

Despite initial efforts to assess the effects of the ad bans, several questions remain:

- First, we do not have a clear understanding of how campaigns, agencies, and political organizations shifted spending in response to ad bans. How did they reallocate spending when Spotify, Amazon, Pinterest, LinkedIn, and Tik Tok banned political ads; in the final week of the general election in response to Facebook's ban on new ads; and in the first weeks of the Georgia runoff? Did they move money to other digital platforms or providers, other media, or other campaign activities?

- Second, given that political ad bans are broadly meant to mitigate the spread of misinformation, did the content of political ads change following the ad bans?

- Third, how have bans impacted different types of campaigns and organizations? Are there meaningful differences in how bans have impacted incumbent and challenger, Democratic and Republican, federal and state, or wealthy and poorer campaigns?

Data Access Challenges and Recommendations

Addressing these questions will require triangulating across both different methods and different data sets. The Federal Election Commission (FEC), which provides [detailed records](#) of how political committees[1] spend money and platform political ad archives are two useful sources of relevant data. While the FEC and platform ad archives provide important insight into the political ad bans, both have significant issues that complicate our ability to leverage these archives to assess the impact of the political ad bans. We discuss these challenges and offer specific recommendations to improve data analysis.

Federal Law Should Require Political Advertisers to be More Transparent

Current reporting requirements, established by the [Federal Election Campaign Act (FECA) of 1971](#), require committees to report the "name and address" of each "person to whom an expenditure in an aggregate amount or value in excess of $200 within the calendar year is made...together with the date, amount, and purpose of such operating expenditure." [FEC regulations](#) also require that "An account shall be kept of all disbursements made by or on behalf of the political committee," including:

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1 We use "committee" in the way used in campaign finance law: all political campaign committees and political organizations directly advocating on behalf of candidates.

i. The name and address of every person to whom any disbursement is made;

ii. The date, amount, and purpose of the disbursement;

While this may seem to require consultants acting "on behalf of" committees to report descriptions of specific payments, the FEC clarified the disclosure requirements in Advisory Opinion 1983-25. The opinion states that "Consultants [sic] payments to other persons, which are made to purchase services or products used in performance of Consultants' contract with the Committee, do not have to be separately reported" if a handful of conditions are met. These include that there is distance between the committee and the consultants ("arms-length"), the consultants take on other clients, and the committee "will have no interest in these contracts" with sub-vendors. These rules have been affirmed and clarified through subsequent caselaw.

The lack of sub-vendor reporting is a critical issue because the overwhelming majority of political ad spending during elections runs through consultancies. Analyzing 2020 FEC data, we estimate that nearly 94% of all money spent on advertising in the final month of the general election was directed through consultancies (see Figure 1).[2]

Figure 1: Coordinated advertising spending through consultancies and direct to advertising platforms between October 3 and November 3, 2020

Coordinated Advertising Payments to Consultancies Direct to Advertising Platforms
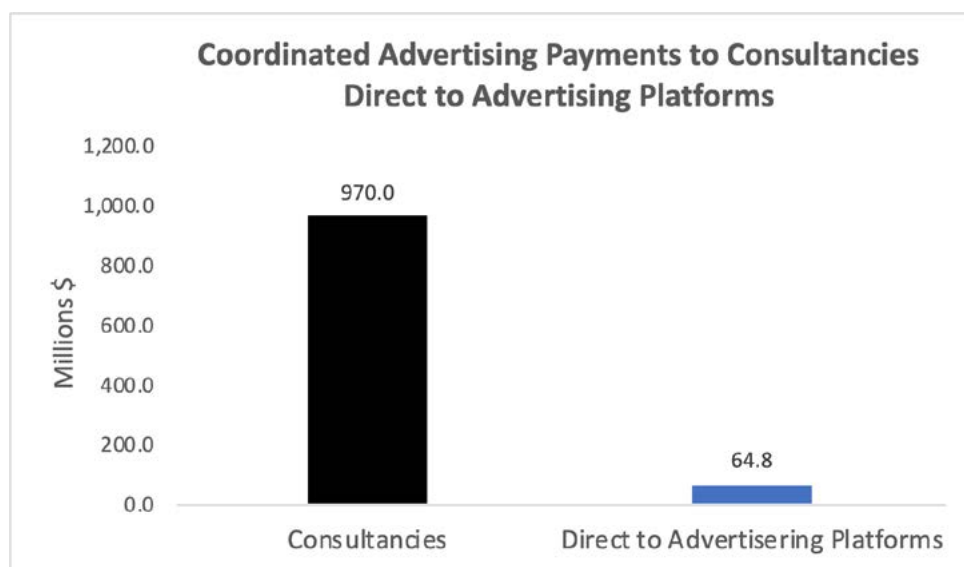
Figure 1 shows the amounts of money political campaigns and organizations reported to the FEC that they paid to consultancies and paid directly to advertising platforms for coordinated advertising between October 3rd and November 3rd 2020.

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2 While we did not include entries that indicated they were for ad production, importantly, this figure likely includes spending on ad production by consultancies, and so may overestimate the breakdown of consultancy vs direct payments.

This means that for 94% of money spent on advertising in the 2020 election, we are unable to track how much was spent on which advertising platforms and on what dates. This disclosure gap creates a large black box around advertising spend spending that makes it difficult to assess how consultancies, acting on behalf of campaigns and political organizations, adjusted ad buys in response to platform ad bans.

For example, in his short-lived presidential campaign, Mike Bloomberg set up the firm Hawkfish to coordinate much of his campaign data and advertising. After he suspended his campaign, the firm lived on, talking on a handful of other Democratic clients. In the last month of the campaign, Hawkfish was one of the largest recipients of money for coordinated digital advertising (see Figure 2). However, that money, totaling more than $2 million, is described by only *five*[3] entries in the FEC dataset, labeled simply as "digital advertising" or "paid media-online." While platform ad archives can provide some additional, if limited insight into how this money was spent (see below), without more detailed insight about spending we cannot assess if or how Hawkfish (and their clients) shifted money in response to Facebook's ban on new ads in the last week of the election.

In addition to presenting challenges for analyzing FEC spending data, the lack of disclosure requirements provides campaigns and political organizations with an easy way to intentionally hide how they spend money. There is little stopping campaigns from passing money for advertising (or anything else) through shell companies and avoiding reporting how it is spent.

Worse, there is an indication that some campaigns and political organizations may be using this loophole to launder campaign money. Recently, the Campaign Legal Center filed a complaint with the FEC alleging that the Trump campaign used shell companies, including American Made Media Consultants (AMMC), to both hide campaign spending and to launder "$170 million in spending to conceal payments to people close to the Trump family and campaign." AMMC has a limited public profile: it has no website, and no one on LinkedIn lists being employed by the firm.

Our analysis of 2020 FEC data shows that AMMC was the single largest recipient of money labeled for coordinated "digital advertising" (or related terms) in the last month of the election. In that month alone, it received more than $100 million, most of which came from the Trump campaign. No ads attributed to the company show up in the Facebook, Google, Reddit, or Snap ad archives (see Figure 2). It is certainly possible that AMMC did not purchase any ads on those platforms, but the opacity of FEC data makes it impossible for researchers to know.

Given that the vast majority of coordinated advertising spending in the last month of the 2020 general election went through agencies or consultancies, **we recommend revisions to reporting requirements such that political advertising, communication, and marketing agencies and consultancies must disclose spending to the FEC on behalf of campaigns and political organizations. Due to the language of FECA**

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3 Hawkfish shows up an additional 14 times in FEC data for the last month of the election in coordinated spending filings labeled as "media strategy," "ad production," or related terms.

and of FEC regulations, we believe that reporting requirements could be revised through an advisory opinion.

Alternatively, these changes could be made through legislation. The Honest Ads Act (see below) would introduce new disclosure requirements for digital political advertisements. The Political Accountability and Transparency Act, introduced in the House in January 2019, would impose a host of new requirements and limitations on campaign spending. Both bills could be revised to require political committees to disclose detailed information about spending by advertising consultancies.

These new requirements would both facilitate transparency about campaign spending and would make it harder for campaigns and political organizations to use intermediaries to hide both legal and illegal spending.

California and Washington both recently revised their political advertising regulations to require agents or vendors to report expenditures on behalf of committees. Both could provide a guide for regulatory change at the federal level.

Requiring more detailed and granular reporting of advertising expenditures would impose significant new burdens on both agencies and committees. Indeed, the realities of digital advertising would pose serious complications for increased transparency. Agencies frequently upload dozens, if not hundreds or thousands of ads and variations of ads onto a single platform. As seen in Figure 2, GMMB uploaded at least 38,000 ads to Facebook in one month before the election. Reporting requirements would be even more complicated ad buys occurring through demand side platforms (DSPs) that collect and sell ad space across thousands of different websites and apps.

However, many consultants already prepare detailed reports for committees about how they are spending advertising money. Furthermore, we believe that there is an opportunity for the FEC to work with platforms and other digital ad providers to devise a means of automating reporting requirements—especially if platforms also have additional reporting requirements to meet (see below). Given this, **we recommend that the FEC hold a series of workshops to explore how platforms, committees, and the FEC can collaborate to automate disclosures.**

The FEC Should Improve Its Data Disclosures to Facilitate Political Advertising Research

The FEC archive consolidates data from election disclosure forms. Committees must report a handful of data points, including date, amount, recipient, and "purpose of disbursement." Federal regulations specify that the "purpose" of a disbursement must be a specific "statement or description of why the disbursement was made," and specifically notes that descriptions such as "expenses" or "get-out-the-vote" are not acceptable labels. However, FEC Advisory Opinion 1983-25 specified that while existing law requires an "adequate description of the purpose" of a disbursement, "the description 'media' is considered as a satisfactory description for a payment that is, in fact, made for media, such as the purchase of media time or media space."

We believe that the guidance in 1983-25 allows descriptions to be unhelpfully vague. "Media," for example, could mean ad production, strategy, data or placement on any medium: TV, radio, newspapers, or digital platforms. We believe permitting these vague labels serves neither the interests of transparency nor the spirit of the law. **We therefore recommend that FEC revise its interpretation of existing law and issue a new Advisory Opinion requiring greater specificity in disbursement descriptions.**

To further improve transparency, we recommend standardization of possible "purposes" on filings. Currently fields on FEC disclosure forms are open answer. This means that committees can supply whatever description they believe is suitable. Answers vary widely. For example, in the final month of the 2020 general election, payments to Facebook are described as "digital advertising," "social media ads," "digital marketing," "advertising," "online advertising," "web ads," "Facebook ads," "internet advertising," "paid media-online," and "ads." Similarly, disbursements descriptions rarely specify if advertising funds were used for ad production, placement, or other services. The lack of both detail and standardization not only permits committees to supply less descriptive terms, it makes it difficult for analysts to identify and compare advertising spending across thousands of FEC entries. Without standardization, researchers are often required to go through data line by line or risk missing important, but poorly labeled data.

We recommend that FEC forms provide a limited number of standardized categories for disbursement descriptions. This would ensure greater specificity in and standardization of disclosures—preventing, for example, there being a dozen different terms for "digital advertising."

In addition to revising its disclosure requirements, the FEC should alter how it releases data. The FEC did not release data from the final filing period of the 2020 general election until the middle of January, meaning the data were not available for analysis prior to the Georgia runoff. With the two largest ad platforms prohibiting political ads from November 4 through mid-December, campaigns had little precedent for devising strategy at the beginning of the Georgia runoff. Had the FEC released data earlier, campaigns might have gained valuable insights about how to direct their spending in the wake of the Facebook and Google ad bans, and researchers might have had the information necessary to develop guidance on the impact of the bans on political speech.

Similarly, instead of releasing 2020 general election data all at once, the FEC released the data as it was processed, repeatedly updating the database with small additions. The FEC did not announce each time the database was updated, nor did it announce when all the data were released. There was no way of knowing if or when all filing data were available, and no way for researchers to know ahead of time if they would be able to analyze FEC data before the Georgia run-off.

We recommend that the FEC provide a clear timetable for the release of election-related data. They should announce and record each database update and make a public announcement when the data have been fully released for each

reporting period. These minor changes will allow researchers to better anticipate and plan data analysis.

Platforms Should Modify Political Ad Libraries to Increase Transparency

Federal law does not require platforms to maintain political ad archives. Four major platforms that permitted political ads in the 2020 general election, Facebook, Google, Snap, and Reddit, maintain public archives of political ads.

Facebook and Google's archives are both accessible through public interfaces as well as through application programing interfaces (API). Both platforms' public interfaces allow keyword searches that can then be filtered by a small number of additional criteria, including by date. Neither interface recognizes Boolean operators, which limits the ability to easily narrow searches. For Facebook, search results in the public interface are limited to 50,000 results, and the system only returns approximate numbers of ads. Google does not display any counts of returned ads. While both platforms provide data on ad spending and impressions, both display these data in ranges rather than specific amounts. Google provides data about age, gender, and location targeting—the only forms of political ad targeting Google allows. On January 25, 2021 Facebook announced that it will begin releasing some limited data about how political ads are targeted for academic research. Neither platform public interface allows batch downloads of searched ads or associated metadata (although both APIs do). However, Google consolidates all political ad data into a series of large CSV files.

Snap and Reddit's archives look quite different from Facebook and Google's. Starting in April 2020, Reddit began adding all political ads it ran to a special subreddit, r/RedditPoliticalAds. Reddit posts a limited set of metadata for each ad, including about ad spending, impressions, active date, and interest and geographic targeting. Similar to Facebook and Google, Reddit displays data on ad spending and impressions in ranges. Reddit's simple search function permits keyword searches within the dataset; however, it does not permit any filtering like Facebook or Google's interfaces.

Snap provides a political ad archive that is consolidated into a single CSV file. The entire 2020 file, which includes ads from across the world, contains only 12,731 ads, fewer than half number of ads uploaded by just one agency on Facebook in just the last month of the election (see Figure 2)[4]. Although Snap does allow users full access to data, it does not have a public interface that makes it easy for users to search their archive.

APIs provide further means of accessing, filtering, and downloading Facebook, Google, and Reddit's political ad data. However, API access also has limitations. In mid 2019, Mozilla noted a range of stability issues and bugs with Facebook's political ad API. In a series of tests, they found that "in 33.04% of the cases, even if a political ad contains a keyword, the ad is not returned by the API when we search for the keyword." Similarly, a list of issues curated by Social Science One observes that "The

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4   It is unclear if or how Snap is counting all ad variations. On Facebook, advertisers often upload many variations of the same ads to experiment with design choices.

public Ad Library and the API seem to be operating as separate retrieval systems that on numerous occasions seem to be reporting different results even when employing identical searches, which is obviously extremely problematic." It remains unclear if or how the Facebook Ad Library API has been updated.

More broadly, accessing APIs requires both additional screening (for Facebook and Google), and at least basic programming knowledge. We believe, however, that any researcher should have access to platform political ad archives, not only those who know programming.

We recommend that APIs and public interfaces provide the same data. We also recommend that political ad libraries maintain public interfaces that have strong search capabilities that integrate the full range of Boolean operators and permit batch downloads of ads and/or metadata. This will ensure that even those without programming knowledge can access these data.

Just as FEC data obscure how consultancies spend money on behalf of campaigns, so do some platform political ad archives. Platforms are under no legal obligation to report or disclosure the intermediaries that purchase ads on behalf of committees, and few appear to do so.

Judging by the Facebook API code book produced by Social Science One, the Facebook Ad Library does not appear to have a variable that specifically and reliably identifies the company or intermediary that produced and submitted the ad. While there is a variable for "funding_entity" defined as "A string containing a name of a person or entity funding the ad, submitted by the ad purchaser," there appears to be flexibility in how this is interpreted.

Figure 2 shows the number of ads returned in searches of the Facebook Ad Library public interface for the 20 agencies that received the most money labeled for digital advertising (and related labels) for coordinated spending in the last month of the election. While searches for some agency names returned ads, agency names are not displayed on the ads the search surfaces, making it difficult to know how exactly the data is coded. More importantly, many agencies that received large amounts of money for digital ads do not appear on any ads in the Facebook Ad Library. While it is possible that some of these agencies did not purchase any Facebook ads, in previous cycles Facebook has accounted for nearly 60% of all digital political advertising, making this unlikely.

Similarly, neither the Google nor Reddit ad archives identify the consultancies that purchase ads (and likely completed ad design and production). Notably, none of the consultancies in Figure 2 are listed on ads in either the Google or Reddit archive.

In contrast, Snap's archive includes separate variables, "OrganizationName," which appears to be the organization that actually uploaded and purchased the ad and "PayingAdvertiserName," which appears to be the campaign or political organization that ultimately paid for the ad. Reviewing 2020 data on US ads, most ads appear to list both the funding organization and the agency that actually purchased the ad. While

fewer ad agencies bought ads on Snap than Facebook or Google, Figure 1 shows that Snap's archive identifies ads from many of the top left-leaning agencies.

While synthesizing ad library and FEC data makes it possible to see how consultancies likely spent money on individual platforms, being able to look across platforms at how consultancies are targeting ads, devising strategy, and spending money would not only increase transparency, it would help us better study ad bans. If consultancies are the main drivers behind political ads in the US, it would be helpful to have information to study how they operate.

Snap's political ad archive offers a useful example of how a minor change in an ad archive's codebook can increase transparency. **We recommend that ad archives follow Snap's lead and include two distinct variables in their ad archives that distinguish between the funder and the purchaser of an ad. We also recommend that platforms require both fields to be completed before accepting new political advertisements.**

Federal Law Should Require, Improve, and Standardize Platform Ad Archives

While we hope platforms make these adjustments, the federal government bears ultimate responsibility for establishing the rules on election advertising disclosure obligations that will provide meaningful transparency and keep pace with evolving technologies. We support recent calls for legislation requiring platforms to maintain better archives of political ads.

The Honest Ads Act, which remains unpassed after first being introduced in the Senate in 2018, requires platforms to establish archives of digital political ads they run. It specifies that the archives include copies of ads along with a series of basic metadata, including:

> a description of the audience targeted by the advertisement, the number of views generated from the advertisement, and the date and time that the advertisement is first displayed and last displayed;

Revisions to the Honest Ads Act could strengthen its requirements of platform political ad archives.

First, in addition to requiring that archived data be machine readable, the act should standardize variable names and formats to facilitate cross-platform analysis.

Second, the Act currently requires recording "(iii) in the case of a request made by, or on behalf of, a candidate, the name of the candidate, the authorized committee of the candidate, and the treasurer of such committee." We recommend that in the interest of addressing the opacity of spending by advertising consultancies, the Act follow Snap's lead and require platforms to record both the funder and purchaser of ads as separate variables.

Third, the Act currently applies to all "online platforms" that sell political ads and that

have more than [50,000,000 unique monthly visitors from the US](#). While this clearly applies to social networks like Facebook and Google, it is less clear that it applies to other major providers of political ads. Political committees and consultancies [are increasingly buying programmatic display digital ads](#) through Demand Side Platforms (DSPs) that coordinate display ads across thousands of websites and apps. As written, the Act applies to where ads run, but not to the intermediaries, like DSPs, that coordinate buys. On one hand, many of the venues hosting ads placed by DSPs may not meet the large visitor thresholds. On the other, it would benefit both research and transparency to have consolidated archives for all the ads coordinated by DSPs.

Similarly, [campaigns and committees increasingly](#) bought connected-TV (CTV) and over-the-top (OTT) (i.e. streaming service) ads in the 2020 election cycle. It remains unclear if and how the Honest Ads Act currently applies to these advertising providers. We recommend that the Honest Ads Act be revised to ensure that a wider range of providers – including DSPs, CTV providers, and OTT providers – are also required to archive political ads.

Finally, the Act requires that platforms make archives ["available for online public inspection."](#) We recommend that the Act be revised to specifically require that platforms maintain public interfaces that facilitate easy search and discovery of political ads by those without programming knowledge.

Figure 2: Top 10 Democratic and Republican Communication Agencies by coordinated digital advertising money received in the last month of the 2020 general election[5]

Name	Party Affiliation	$ received from campaigns for **digital ads** in final month of the campaign	# of ads in archive Oct 3-Nov 3 associated with each firm			
			Facebook Ad Library	Google Transparency Report	Snap Transparency Report	r/Reddit Political Ads
GMMB	D	65,873,608	38,000	0	319	0
Bully Pulpit Interactive	D	45,987,364	7	0	318	0
Mothership Strategies	D	10,027,276	0	0	0	0
GPS Impact	D	7,130,220	1	0	2	0
Rising Tide Interactive	D	5,032,388	49	0	6	0
Blueprint Interactive	D	3,595,484	0	0	20	0
Authentic Campaigns	D	3,243,543	2	0	4	0
Hawkfish	D	2,255,764	0	0	296	0
Middle Seat	D	2,113,093	15,000	0	0	0
Harta Communications	D	2,007,297	0	0	0	0
American Made Media Consultants	R	107,180,715	0	0	0	0
Targeted Victory	R	15,169,433	1	0	5	0
Push Digital	R	9,787,418	100	0	0	0
Connell Donatelli*	R	7,567,000	0	0	0	0
Cavalry	R	6,932,433	8°	0	0	0
Campaign Solutions*	R	2,375,916	800	0	2	0
FP1 Strategies	R	1,493,907	1	0	0	0
The Prosper Group	R	1,142,815	23	0	0	0
Convergence Media	R	1,012,641	0	0	0	0
Majority Strategies	R	646,930	30	0	0	0

Figure 2 shows the 10 Democrat and top 10 Republican-leaning communication consultancies that received the most money from committees for coordinated expenditures for digital ads between October 3rd and November 3rd 2020 according to FEC data. It also shows the number of ads surfaced in searches of each agency's name in Google, Facebook, Snap, and Reddit's ad archives during the same period.

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5   Figure 2 does NOT include data with generic labels such as "media" or "advertising." It only includes data specifically tagged as for digital ads. This means that much money spent on digital ads is likely not included here.
* Connell Donatelli and Campaign Solutions are sister companies with much of the same staff. However, as they have separate names and websites, we have kept both.
° These appear to be false positives; however, we cannot be sure given the limitations in the data released by the public interface of Facebook's Ad Library.

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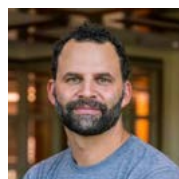
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