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Free Speech and the Internet

Submitted in partial fulfillment of the requirements for

Honors in Philosophy

University of Mary Washington

Fredericksburg, Virginia

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Philosophy 485

April 24, 2020

Supervised by Professor Craig Vasey

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Part 1: The Marketplace of Ideas – A Framework on Free Speech

I. Introduction

Every weekend, hundreds of high school and college students participate in various formats of competitive debate. Students are asked to assess the desirability of different resolutions that typically involve substantial political or social issues. While topics vary in scope and how long they are nationally debated based on format, all students are required to engage in discussion from multiple different perspectives as they will have to defend both sides of a resolution. For example, if a tournament has 6 preliminary rounds, a debater must prepare to affirm and negate the resolution for 3 rounds for each side. Debate boosts information literacy, teaches how to have productive discussion, and increases civic engagement for our youth.¹ In a world full of partisanship and hate, debate shines as a beacon for how public discourse can improve: two speakers who have done research for the other side seeking to come to a common understanding and furthering an academic discussion. The practice of debate stresses that no question is settled and leads to both sides trying to develop the best version of their arguments. Here, one observes a marketplace of ideas where the best conclusion is sought.

John Stuart Mill, as a utilitarian, argues actions that benefit society ought to be prioritized. For him, free speech has immense value because nothing is definitively settled or one-hundred percent true, so the best way to improve knowledge is a grand contest of ideas to produce the best result. This paper recognizes free speech as good for Mill's reason of truth-seeking but explores contemporary arguments on whether a free flow of ideas is the best way to do so. It will start with laying out a theory of free speech as advocated by Mill, encouraging a free market of ideas regulated by a harm principle. Afterwards, several problems for Mill's

¹ Danielle R. Leek, "Policy debate pedagogy: a complementary strategy for civic and political engagement through service-learning," *Communication Education* 65, no. 4 (2016): 397-408.

theories will be laid out and assessed. The problems presented, such as hate speech, misinformation, and groupthink, appear as extreme counterexamples of Mill's argument; however, their existence presents a question of when speech should be limited and when speech becomes beneficial for society. In each of these cases, research will be presented for and against Mill's writings with some based in philosophical work and some based in U.S. common law, or law based in court precedent. U.S. common law has a rich history concerning free speech issues enshrined in First Amendment cases. Sharing ideas is better than silence, as it educates others and keeps society advancing along. The goal is, given several modern objections, to assess whether Mill's theory of free speech is relevant today by showcasing many of the inherent tensions in the literature.

II. On Liberty

John Stuart Mill's *On Liberty* is regarded as one of the most important works in philosophy of free speech. Mill's book was in response to a time period of a growing middle class amidst improving economic conditions. Mill feared that the working class would diminish to the point of becoming a small minority that would not have their views expressed in government policy. Because of incentives for politicians to appeal to most of a society, the working class would be forgotten, and the political landscape would shift in favor of the middle class. Mill found this problematic since the minority, in this case the working class, would be unable to articulate their viewpoint and would not have it be considered. This was significant when considering Mill's stance on free speech since it shows Mill's concerns about ensuring that the viewpoints of underrepresented groups are heard.² In response to these developments, Mill outlines the importance of free speech in the second chapter of *On Liberty*, entitled *Of the*

² Clark W. Bouton, "John Stuart Mill: on liberty and history," *Western Political Quarterly* 18, no. 3 (1965): 569-578.

Liberty of Thought and Discussion. For Mill, stifling opinions is immoral since the stifled opinion could be right and the stifled opinion could improve one's viewpoint. Mill acknowledges that no one is infallible, but few take precautions against their fallibility. One should only act upon and assert their opinions if they are certain they are correct, but, even then, should still recognize the possibility of error. Thus, for a more complete view to exist, people should not be silenced and ought to be allowed to speak.³ Mill also believes that even an incorrect opinion can be beneficial since it assists in improving one's viewpoint. If one believes that their position is correct, then they should be able to defend it. Doing so allows for one to continually self-correct themselves instead of blindly believing that their opinions are correct. While a position may not be one hundred percent correct, some criticisms can be partly correct, making it wrong to assume one's correctness. This is possible since even if an opposing opinion is quite wrong, one is still fallible. Only by engaging with someone who disagrees can one come close to finding a true opinion.⁴ To put this philosophical project into work, Mill argues that a society where diverse perspectives exist and are constantly at odds with each other is the ideal society. If one viewpoint were to come about and dominate all other opinions, it would be disastrous for society. This would be an instance of tyranny of the majority. The opinion would become ingrained into society through laws and social norms while having a very low chance of changing despite the possibility of being incorrect or allowing room for improvement.⁵ This is a marketplace of ideas where anyone can express their opinion and encounter criticism or encouragement. The purpose is to find the truest and most complete beliefs. If people from a wide variety of backgrounds can contest and support each other's views, then this becomes possible. For these reasons, free

³ John S. Mill, *'On Liberty' and Other Writings*, edited by Stefan Collini, Cambridge University Press, 1989, 21-22.

⁴ Ibid, 37-40.

⁵ Ibid, 47-48.

speech, for Mill is something that should occur with little intervention and should allow and encourage diverse viewpoints to be expressed.

Mill offers one main constraint for freedom of speech: a harm principle. As explained by Mill, “the only purpose for which power can be rightfully exercised over any member of a civilized community, against his will, is to prevent harm to others.”⁶ Despite the fact that it might be someone’s choice to express a harmful view point and that it would bring the speaker joy, the threat and action of harm creates a chilling effect on the liberty of others. While just explained in a short paragraph in *On Liberty*, this is one of the more controversial points of Mill’s book.⁷ Thus, the harm principle sets out what exactly Mill defines useful free speech that brings benefits to society as. The rest of this paper will concern itself with looking at three potentially harmful types of speech that have etched out gray zones in Mill’s theory.

III. Hate Speech

An important debate in the literature is assessing what necessarily counts as harmful speech. While freedom of speech can be understood as a positive freedom, or the ability for one to exert their will on their own, some believe it is best understood as a negative freedom, or a freedom to do something that should not be prevented by others’ interference. Applied to the harm principle, hate speech and other forms of unhelpful speech could cause a chilling effect on speech whereby someone no longer feels comfortable sharing their ideas. Understanding speech as a negative freedom in addition to a positive freedom means to regulate against such harmful speech. In a 2011 book, Katharine Gelber, a professor of politics and public policy at the University of Queensland, tries to find a way to limit freedom of speech to exclude hate speech

⁶ Ibid, 13.

⁷ Ibid, 13.

without chilling democratic discussion. This author recognizes the importance that all speech has for improving societal well-being in the pursuit of truth. Whether or not potentially hateful speech is beneficial, Gelber believes that a line should be drawn for hate speech, as it potentially creates a chilling effect. If people are too afraid to share their opinions since they fear hateful backlash, then the marketplace of ideas has essentially placed a restriction on potentially helpful speech.⁸

There are several of Mill's defenders that have a problem with expanding the harm principle too far, or even the harm principle itself. One line of criticism comes from cultural relativism. Paul A. Passavant argues that ontology shapes reality; consciousness alone does not produce one's ideas that turn into speech. Ideas depend on one's social location, which explains why there is so much variance from society to society on what counts as harmful or valuable speech for society. Trying to limit speech in such a way is problematic under a Millian framework, since excluding speech one might see as harmful or on the fringe of being harmful may be viewed differently somewhere else. Such an exclusive and exclusionary model, these authors argue, is a Western-centric approach that deems all those on the outside as "savages" for promoting different models of discourse. For a theory that tries its best to find the truth, excluding such speech could be harmful.⁹

To be clear, these arguments do not advocate for a wholesale hate speech that makes people feel uncomfortable to the point of not talking. Lots of more recent free speech discussions have focused on direct over indirect exclusions. Direct exclusions are explicit bans or restrictions on speech like limiting a woman's right to speak through denying the right to vote. Indirect

⁸ Katharine Gelber, *Speech matters: Getting free speech right*, University of Queensland Press, 2011.

⁹ Paul A. Passavant, "A moral geography of liberty: John Stuart Mill and American free speech discourse," *Social & Legal Studies* 5, no. 3 (1996): 301-320.

exclusion includes norms that prescribe a certain kind of conduct in a discursive setting, such as speakers who stumble with awkward pauses and filler words being discredited by their audience. This distinction may help to appease concerns over hate speech. Perhaps it would be better to regulate through indirect exclusions that are more targeted to the way a speaker presents their idea rather than the idea itself. Passionate speech is important to conveying one's strong beliefs and would be difficult to regulate since there is no objective arbiter on when speaking passionately is viewed as hateful speech; however, any benefit turns to a negative when a speech is filled with anger or anxiety. Just because people present their argument in a negative way should not mean that the content of their ideas should be regulated, nor should the simple injection of their ideas be viewed as the worst form of hatred. Even if they do mean harm, injecting oneself into discussion spaces where one would otherwise be excluded is important, and having dialogue and discussion becomes especially important. Further, exclusion has always been worse when no one was able to discuss seemingly taboo subjects that affect people with little voice, such as discussions on AIDS treatment or matters related to incarceration.¹⁰ Former Supreme Court Justice John Paul Stevens offers a potential solution to this. While concerned about the rise of hate speech, he holds that the question should not be whether hate speech generally is permissible, but rather what particular hate speech is permissible. He further advocates a check on hate speech whereby it must prove to plausibly have some societal benefit in order to be classified as protected speech.¹¹

A response that those trying to restrict hate speech could look at cases where someone's speech had been drowned out. A marketplace of ideas trying to give power to minority voices

¹⁰ Robert Asen, "Imagining in the public sphere," *Philosophy & Rhetoric* 35, no. 4 (2002): 345-367.

¹¹ John Paul Stevens, "The freedom of speech," *Yale Law Journal* 102 (1992): 1293-1313.

would have a lot of trouble if such voices were drowned out by louder ones. Even if such speech was well-intended with trying to hedge back against harmful speech, the louder speech itself sets a bad standard whereby people can disengage from any speech that they simply do not wish to hear. There has been extensive coverage of people drowning each other out in public forums. A good example of this has been on public campuses, where students have shown up in protest to events featuring controversial speakers. A good example is when Dr. Charles Murray, a conservative speaker, was invited to Middlebury College by a student organization hoping to establish a civil dialogue about Murray's ideas. Instead, students showed up *en masse*, loudly shouting for the speaker to leave. The speaker soon left the campus, with angry protestors following. This sets up an interesting dilemma for the free speech advocate: the protestor has the right to make their opinions known but could degrade the marketplace of ideas by drowning out speech from underrepresented groups. Such a provision is called a "heckler's veto," or when speech is restricted because of the anticipated or actual reactions of those who disagree.¹²

The U.S. Supreme Court has gone back and forth on whether the type of speech that the protestors utilized in this case is justified. These situations have offered several empirical examples of "heckler's veto" scenarios. One of the first such cases was 1951's *Feiner v. New York*, where someone on a street corner began shouting, imploring people of color to "rise up in arms and fight for equal rights."¹³ After some members in the growing crowd threatened violence towards the speaker if nearby police officers did not get involved, the man was arrested and convicted. The Supreme Court upheld these actions, implying that crowds could prevent speakers if they threatened violence. Though Chief Justice Vinson's majority opinion held that

¹² Charles S. Nary, "The New Heckler's Veto: Shouting down Speech on University Campus," *University of Pennsylvania Journal of Constitutional Law* 21 (2018): 305-154.

¹³ *Feiner v. New York*, 340 U.S. 315 (1951).

“ordinary murmurings and objections of a hostile audience cannot be allowed to silence a speaker,” he distinguished the content of the speech from the forum for speaking, which included a crowd that could easily turn hostile.¹⁴ This decision proved to be a conundrum for courts during the Civil Rights movement, as peaceful black protests were broken up because white counter-protestors were threatening violence. Speech with the aim of drowning out other opinions seems to be a clear case of harmful speech that Mill’s theory of a marketplace of ideas would not allow. Mill set out parameters for peaceful discussion where both sides had the goal of learning more about each other’s positions. If one group or person could not be heard over the intensity of another’s voice, then that person is silenced, and their opinion is not considered.¹⁵

IV. Misinformation

Misinformation represents a historical but growing threat in American democracy. A classic example is the 1938 radio broadcast of Orson Welles’s *The War of the Worlds*. Many tuned in midway through the reading, thinking that the events described were ongoing. According to Jefferson Pooley, a Muhlenberg College communication professor, and Michael J. Socolow, University of Maine communication and journalism associate professor, several stories, picked up by many national newspapers, depicted adverse reactions to the event; however, many historians have discredited depictions of what is often called “mass hysteria,” finding that many of the accounts were cherry-picked by newspapers and, most stories that were picked up, were uninvestigated and unconfirmed. While it is believable that there would be people confused about tuning into the broadcast late, the media overexaggerated the effect of the

¹⁴ Ibid.

¹⁵ Nary, "The New Heckler's Veto: Shouting down Speech on University Campus."

broadcast to the point of creating a supposedly well-known story.¹⁶ Untrue misinformation is a significant challenge to Mill's free speech, since he advocates the marketplace of ideas on the basis of finding truth. It has often occurred on a spectrum between purposeful and accidental information, given there has always been a bias to present information in a way favorable to one's interests and experiences. This has been a heightened problem in today's era of technology, where such fake stories are highly inflammatory and can be circulated at a rapid pace.¹⁷ Psychological research has proved that misinformation creates a confirmation bias based on what people are angry or anxious about. This builds a confirmation bias where people are more likely to accept news that is either false or biased in a particular direction.¹⁸

Despite these potentially harmful factors, U.S. common law has interpreted the First Amendment to protect misinformation as free speech, even if the speech itself is valueless. While there are some cases that recognize the harmfulness of false information to society, such as *Hustler Magazine, Inc. v. Falwell* and *Gertz v. Robert Welch, Inc.*, these cases found that obviously false information had no value to society but left open the possibility for numerous gray zones.¹⁹ For example, in 1990's *Milkovich v. Lorain Journal Co.*, the Supreme Court ruled that information, even if false, was protected as long as a reasonable factfinder could find that there is sufficient reason or evidence to believe that the truth or falsity of the statement is in question.²⁰ This opened the door for cases such as *United States v. Alvarez* in 2012. In this

¹⁶ Jefferson Pooley and Michael J. Socolow, "The Myth of the War of the Worlds Panic," *Slate*, October 28, 2013, <https://slate.com/culture/2013/10/orson-welles-war-of-the-worlds-panic-myth-the-infamous-radio-broadcast-did-not-cause-a-nationwide-hysteria.html>.

¹⁷ Daniela C. Manzi, "Managing the Misinformation Marketplace: The First Amendment and the Fight Against Fake News," *Fordham Law Review* 87 (2018): 2623-2651.

¹⁸ Brian E. Weeks, "Emotions, partisanship, and misperceptions: How anger and anxiety moderate the effect of partisan bias on susceptibility to political misinformation," *Journal of Communication* 65, no. 4 (2015): 699-719.

¹⁹ Manzi, "Managing the Misinformation Marketplace: The First Amendment and the Fight Against Fake News."

²⁰ *Milkovich v. Lorain Journal Co.*, 497 U.S. 1 (1990).

instance, the U.S. had passed a law outlawing false statements on military valor. The Supreme Court struck this law down on the basis that the government should restrict free speech as little as possible and that the government had failed to provide a reason for why such speech was harmful.²¹ *United States vs. Alvarez* built on existing law that tended to be in favor of keeping speech rather than restricting it, and showed a wariness, similar to Mill's worries, of possibly excluding speech expressing an unheard viewpoint. Generally, for false claims, the Court has held that actual malice needs to be shown in order for a government to regulate speech. This legal framework has made it difficult and unconstitutional to pursue any type of restriction on free speech.²²

Some discount the worries that people have about false information. The most common argument is that the marketplace of ideas is strong enough to handle misinformation. As described, the marketplace of ideas allows for people to critically assess information and arguments. A rational individual, as the argument goes, would be easily able to sort out what is true or false. Such thinkers err on the side of allowing for more speech rather than possibly setting a precedent on restricting speech. This is not a foolproof process, which many are quick to point out; however, some, such as UC-Berkeley law professor Daniel A. Farber, argue that allowing misinformation makes society better by making people more critical and better at assessing sources.²³ A response to this line of argument is that, even if the existence of misinformation trains people to be better analysts, putting people in a situation where they could believe in something false is wrong. An underlying factor of Mill's argument is being able to

²¹ *United States v. Alvarez*, 567 U.S. 709 (2012).

²² Manzi, "Managing the Misinformation Marketplace: The First Amendment and the Fight Against Fake News."

²³ Daniel A. Farber, "Free speech without romance: public choice and the first amendment," *Harvard Law Review* 105, no. 2 (1991): 554-583.

express your choice in opinions; false information means that people do not make these choices well and accidentally spread the same misinformation to others.²⁴

V. Groupthink

A final group of potentially harmful speech are ideas produced through groupthink. Groupthink is the idea that insulated groups will promote free speech but only choose to speak within groups that are receptive to what they have to say. There are several examples in the U.S. Both sides of the political spectrum have blamed the other for engaging in this type of behavior. The Left has accused the Right of creating such echo chambers through their various media sources, which have a largely Republican base that they cater news exclusively to without offering a substantial amount of oppositional ideas or unbiased reporting.²⁵ Meanwhile, the right has accused leftist youth and colleges of being tribal forums where disagreement is disinvented and speakers are shouted down without being heard.²⁶

Echo chambers are a problematic development for the marketplace of ideas. While some form of groupthink and intense association has existed forever, this has been pronounced in recent years with increased partisanship. People have begun to prefer talking to people who agree rather than those who disagree which harms the ability for people to have a dialogue to understand the bigger picture about issues. It also leads to them knowing substantially less about their ideas and arguments, with very little development in their arguments and beliefs. While the left clings to ideals of raising tolerance and the right clings to traditional values, both are

²⁴ Susan J. Brison, "The autonomy defense of free speech," *Ethics* 108, no. 2 (1998): 312-339.

²⁵ Isabel V. Sawhill and Eleanor Krause, "Gauging the role of Fox News in our electoral divide," *The Brookings Institute*, September 20, 2017, <https://www.brookings.edu/opinions/gauging-the-role-of-fox-news-in-our-electoral-divide/>.

²⁶ Joseph Russomanno, "Tribalism on Campus: Factions, iGen and the Threat to Free Speech." *Communication Law and Policy* 24, no. 4 (2019): 539-586.

undermined by groupthink. A new intolerance of ignoring those who do not agree thus arises.²⁷ Others also argue that such mentalities lead to otherization of those who are excluded from their political circle. While these groups may have been able to avoid difficult discussions or have been able to speak easier by skirting substantial criticism, it has made things worse for discussion.²⁸

An argument against such concerns would be based on the freedom of assembly. Many, including the founding fathers, view group formation as a key political right. It allows people to consolidate their voices under a unified force to strengthen their position. This allows the people to then easily hold groups to account. As documented throughout history, it has been minority groups who have benefited greatly from freedom of assembly; it has allowed for coordination of peoples and ideas that would otherwise be impossible given a disadvantaged position. Thus, trying to regulate groupthink and echo chamber behavior is difficult and may not be in the interest of society. By attempting to limit echo chambers in one way, it might set a bad precedent whereby groups are either prevented from being formed or people begin to fear joining them and speaking up.²⁹ Indeed, there are several articles that have discussed the benefits of using free speech to develop a unified organizational culture that can hold those in power accountable. A good example of these are labor unions, which take from many diverse viewpoints in order to have more bargaining leverage over powerful management.³⁰ Additionally, there is evidence that perhaps the fear of groupthink is overblown. While it could be harmful speech, there is evidence

²⁷ Kim R. Holmes, *The Closing of the Liberal Mind: How Groupthink and Intolerance Define the Left*, Encounter Books, 2016.

²⁸ Robert Shibley. "Current Threats to Free Speech on Campus." *First Amendment Law Review* 14 (2015): 239-266.

²⁹ Eric Barendt, "Meetings, Protest, and Public Order," in *Freedom of Speech*, (Oxford: Oxford University Press, 2005), 268-311.

³⁰ William A. Haskins, "Freedom of speech: Construct for creating a culture which empowers organizational members," *The Journal of Business Communication* 33, no. 1 (1996): 85-97.

that discredits that groupthink is even occurring. One study looking at echo chambers online for instance found that, while it is true that particular groups mainly spoke to those they were close with, this effect was tempered by the fact that they had access to ample outside information and ideas.³¹ Another study took a psychological approach and found that, even when engaged with their own groups, people seek out those who disagree so that they can better understand their position and dig their heels in on their beliefs. Whether or not this is Mill's idea of a peaceful dialogue of ideas is up for debate, but this provides some evidence against the point that people solely resort to echo chambers.³² These two studies point to the fact that even if people talk more within their own groups, they are their own person that can make decisions about what ideas they subscribe to. As mentioned earlier in the paper, everyone has different experiences depending on their social location, which shapes the information they receive and the opinions they have. If one desires, they can find other information or engage with the other side to confirm their beliefs.

VI. Conclusion

This paper has sought to explain Mill's theory of free speech and survey some objections to it. Mill's theory of free speech is that it is a great benefit to society by encouraging dialogue. He believes that a harm principle should be a constraint on such thinking. The rest of the paper laid out three areas of discussion for whether the harm principle's constraint should be expanded, kept as is, or reduced when contemplating an ideal model of dialogue.

The next step for this project is to investigate applying Mill's theory to a contemporary issue, finding the best way to limit some of the problems mentioned here in this article. There are already several articles that have applied Mill's work on free speech for rationalizing different

³¹ Seth Flaxman, Sharad Goel, and Justin M. Rao. "Filter bubbles, echo chambers, and online news consumption," *Public Opinion Quarterly* 80, no. S1 (2016): 298-320.

³² Rune Karlsen, Kari Steen-Johnsen, Dag Wollebæk, and Bernard Enjolras. "Echo chamber and trench warfare dynamics in online debates," *European Journal of Communication* 32, no. 3 (2017): 257-273.

policy actions. One author argued that the United Kingdom's Racial and Religious Hatred Act of 2006 was a pragmatic example of Mill's harm principle in action, creating a better opportunity for dialogue.³³ Another has applied Mill's free speech to public discourse surrounding jihadist extremist speeches that perpetuated fear within the Muslim community to practice, an example of a chilling effect in action.³⁴ The next paper will deal with problems related to the rise of technology, which has arguably made the problems posed by all of these gray zones a little more pronounced. Technology has had the ability to expand discussion and add many new voices into public discussion. As seen in Iran's Green Movement, more people being added into the fold allowed for people to connect, share ideas, and hold an authoritarian government to account to the point where they have begun to take public opinion seriously.³⁵ While this is a welcome development, expanded access to conversations has allowed for wider circulation of hate speech and misinformation as well as more platforms for groupthink to take place.

Ultimately, freedom of speech is good for all of society. Regardless of how much it should be restricted, freedom of speech and the autonomy to express your ideas fuels academic discussions and products, with this paper as proof. Because no one is perfect, being open to challenges and differences is critical to better understand one's own beliefs and those of others. We are all individuals who will not see eye-to-eye on every given issue. The question is how one engages in such dialogue and whether they are thinking about how their words can affect others. While there is certainly much to fear about how political discussion has devolved into partisan victories, there is still hope. People like those hundreds of students engaged in debate programs

³³ Alexander Brown, "The racial and religious hatred act 2006: a Millian response," *Critical Review of International Social and Political Philosophy* 11, no. 1 (2008): 1-24.

³⁴ Katharine Gelber, "Incitement to Hatred and Countering Terrorism: Policy Confusion in the UK and Australia," *Parliamentary Affairs* 71, no. 1 (2018): 28-49.

³⁵ Joshua A. Tucker et al., "From Liberation to Turmoil: Social Media And Democracy," *Journal of Democracy* 28, no. 4 (October 2017): 46-59.

mentioned at the beginning of this paper was an example of how partisanship can be overcome in the pursuit of learning. These students are given a wonderful opportunity to learn more about positions they previously had little knowledge on while developing their own viewpoints, making them stewards for a better world of inclusive dialogue, especially crucial in their formative younger years. As explained in the next paper in this project, this ideal of education may be the key towards getting more engagement and better speaking forums in our future.

Part 2: The Internet, Free Speech, and Education

I. Introduction

On the day of the U.S. election in 2016 after Trump was announced the victor, the New York Times released a large bundle of opinion pieces under the title, “What Happened on Election Day.” The following writings discussed the state of American politics, mainly focused on the increasing polarization seen throughout the election cycle. While many of the authors differed on political leanings, they all found that Trump being elected was a sign of the rapid devolution of American discourse. Many commented on Trump’s ascent to presidency and the tensions that accompanied it to the arriving social media age of quick diffusion of technology, creating a fast news cycle with strong feelings on both sides of the aisle.³⁶ This rise of the internet in the past two decades has presented a conundrum for Mill’s theory of free speech. Ideally, the marketplace of ideas would benefit from as many positions considered as possible, which the internet’s connectivity and speed provides; however, adding more voices to the conversation in such an expansive and efficient way has worsened many of the examples mentioned in the previous section. The previous section laid out a framework for evaluating what is considered a productive discussion and gave some examples of different types of speech that would be problematic for Mill’s theory on freedom of speech. Each example shows that while the idea of having a productive discussion based on sharing ideas is noble, the idea is complicated by trying to implement such discussions into real life. This section will deal with unique problems the internet age has created for the debate on freedom of speech. First, the section will explore the nature of the internet’s expansion of speech, and the different aspects

³⁶ “What Happened on Election Day,” *New York Times*, November 8, 2016, <https://www.nytimes.com/interactive/projects/cp/opinion/election-night-2016/is-2016a-political-turning-point-for-america>.

making the internet a difficult space for the marketplace of ideas. Second, the challenges for crafting solutions to the internet will be analyzed. Finally, a potential solution of adding critical media literacy curriculum in primary and secondary schools will be considered. The question addressed is whether the marketplace of ideas can withstand the internet. This paper does not fault the internet for many of these more malignant acts but offers recommendations for how to facilitate robust engagement of ideas akin to Mill's vision. While there are many bad examples, the internet can be used as a force for good, but such examples are often problems with the people using the internet rather than the internet itself.

II. What the Internet has Changed

The internet age was at first thought to be a hopeful change for democratic conversation. The ability to reach a wide audience from anywhere in the world was deemed as a hopeful change for the future. The internet has emerged as a large platform for connecting ideas and people. In earlier writings before the explosion of the internet age, many saw great potential in the internet's ability to spread ideas. Instead of a one-to-one conversation, the internet expands the possibility of one-to-many or many-to-many interactions. The largest difference here from conventional media is that, instead of merely consuming media, users shape it by making, sharing, and collaborating on content.³⁷ In the span of just a few hours, one can message people from all over the world, explore a number of causes, and express their sentiments in a public forum.³⁸ In the past, there were few ways for people to spread ideas *en masse*. These barriers, known as "gatekeepers," were the funnel by which information was communicated and

³⁷ David G. Post, "Pooling Intellectual Capital: Thoughts on Anonymity, Pseudonymity, and Limited Liability in Cyberspace," *University of Chicago Legal Forum* (1996): 139-169; Aaron Perzanowski, "Relative Access to Corrective Speech: A New Test for Requiring Actual Malice," *California Law Review* 94, no. 3 (2006): 833-871.

³⁸ Lauren Gelman, "Privacy, Free Speech, and Blurry-Edged Social Networks," *Boston College Law Review* 50 (2009): 1315-1344.

distributed. A gatekeeper “controls access to information, and acts in an inhibitor capacity by limiting access to or restricting the scope of information.” In the modern age, there are a variety of gatekeeping apparatuses, but a general fear of expanding it farther.³⁹ For example, while someone 50 years ago was unable to spread a political message to many people unless first consulting newspaper editors or television producers, today one can easily post thoughts on social media that can reach people around the country and around the globe in mere seconds.

While there are still gatekeepers in terms of internet providers, search engines, and social platforms, there is a general caution against limiting user expression or access to different types of information except in some of the more heinous situations. While it has been easier to create rules against offenses such as blatant copyright infringement and child pornography that plagued the early internet, the social and legal landscape, enforced by an attitude favoring free speech under the First Amendment, has made any gatekeeping from these providers to be minimal for fear of incurring public backlash or legal penalty.⁴⁰ A good example of this is the debate surrounding net neutrality. When people learned that internet providers could possibly limit internet access and what information one receives, they became incredibly fearful of their internet freedom being restricted. Even though the Trump administration’s Federal Communications Commission passed a rule getting rid of net neutrality requirements, the immense public backlash has produced a chilling effect on internet providers showing preference.⁴¹ Thus, the internet has expanded access and the preference towards keeping it as open as possible is likely to persist, especially in the U.S.

³⁹ Cheryl Metoyer-Duran, "Information Gatekeepers," *Annual Review of Information Science and Technology* 28 (1993): 111-150.

⁴⁰ Jonathan Zittrain, "A History of Online Gatekeeping," *Harvard Journal of Law & Technology* 19 (2005): 253-298.

⁴¹ Susan Crawford, "Net Neutrality Is Just a Gateway to the Real Issue: Internet Freedom," *Wired*, May 18, 2018, <https://www.wired.com/story/net-neutrality-is-just-a-gateway-to-the-real-issue-internet-freedom/>.

The internet offers great hope for improving democratic discussion. The “many to many” nature of the internet gives a platform to those who have traditionally been silenced in conventional forums and allows them to connect with like-minded individuals. Generally, there are many examples of the internet furthering democratic principles and discussion. In Iran’s 2009 Green Wave movement, social media allowed for protestors to organize rallies, spread news, and gain domestic support around the world, even with an authoritarian government that had strong control of the media. Other examples include the Indignado movement in Spain, the Tea Party, Occupy Wall Street, and Black Lives Matter.⁴² Further, there has been ample research connecting digital media to political activism, voting participation, and voting behavior.⁴³ While authoritarian regimes could potentially use social media as a tool to suppress dissent and push forth their narrative, the sheer scale of social media and the amount of users to regulate has largely prevented complete control.⁴⁴ This section seeks to survey some of the larger changes in the internet age and how it stacks up to creating a marketplace of ideas. Ultimately, the internet has good potential as an amplifier of otherwise oppressed voices, but it also has amplified many of the bad types of speech that make civil dialogue and competition of ideas all but impossible. Discussions on the internet are not productive if they produce hate speech, misinformation, and groupthink.

⁴² Joshua A. Tucker et al., "From Liberation to Turmoil: Social Media And Democracy," *Journal of Democracy* 28, no. 4 (October 2017): 46-59.

⁴³ Shelley Boulianne, "Social Media Use and Participation: A Meta-Analysis of Current Research," *Information, Communication & Society* 18, no. 5 (2015): 524-538; Daniela V. Dimitrova et al., "The Effects of Digital Media on Political Knowledge and Participation in Election Campaigns: Evidence from Panel Data," *Communication Research* 41, no. 1 (2014): 95-118.

⁴⁴ Ora John Reuter and David Szakonyi, "Online Social Media and Political Awareness in Authoritarian Regimes," *British Journal of Political Science* 45, no. 1 (2015): 29-51.

a. A Wider Audience

The internet has expanded the possibility for democratic discussions, but it has also brought about many fringe groups, evil states, and bad capitalist practices that take advantage of everyone's expanded access. These actors tend to incite tension and benefit by gaining influence, advancing national security interests, or profiting. Hostile conversations tend to happen because the internet makes hate speech "low cost."⁴⁵ Further, the anonymous nature of the internet means that such actors can easily deploy hateful comments and fake news quickly and easily with the aim of creating more tension without ever listening to the other side.⁴⁶ Such possibilities have expanded the possibility of hurtful comments that fuel hate speech and disengagement.

Around the world, the internet has connected and expanded many fringe groups that aim to acquire influence and spread their ideology. Such actors include internet trolls, gamergaters, the alt-right, the manosphere, conspiracy theorists, influencers, hyper-partisan news outlets, and others. These groups use social media to actively incite tensions with those who disagree rather than productively converse.⁴⁷ Further, fringe groups typically engage in groupthink by forming echo chambers on chat rooms and social media sites. While the internet was made to connect like-minded people who otherwise would never meet, this is a problem of "many to many" connection: once one "finds their crowd," there is little incentive to go outside of a place where "fringe" ideas are accepted and where the speaker feels comfortable. This means that even though access is extended, the type of speech that Mill's theory of free speech does not happen,

⁴⁵ Amos Guiora and Elizabeth A. Park, "Hate Speech on Social Media," *Philosophia* 45, no. 3 (2017): 957-971.

⁴⁶ Lee Rainie et al., "The Future of Free Speech, Trolls, Anonymity and Fake News Online," *Pew Research Center*, March 29, 2017, <https://www.pewresearch.org/internet/2017/03/29/the-future-of-free-speech-trolls-anonymity-and-fake-news-online/>.

⁴⁷ Alice Marwick, and Rebecca Lewis, "Media Manipulation and Disinformation Online," New York: Data & Society Research Institute (2017).

and when it is done it tends to be bitter and hostile.⁴⁸ Such echo chambers have been well documented. One such study from 2015 looked at Twitter data from the 2011 Spanish legislature elections and the 2012 U.S. presidential elections. Analyzing almost 70 million tweets from both elections, they found that people aligned with particular political affiliations tended to interact more with people who shared similar beliefs. This was discovered by analyzing patterns of tweets, retweets, and “@-replies.”⁴⁹ Echo chambers are the effect of people who no longer wish to engage the other side. In the internet age, this makes it easier to react badly to comments of those on the other side of the political spectrum.

Additionally, there are also state actors attempting to modify information to advance national security objectives. Russia is the biggest example of such methods. Russia’s internet strategy is to limit the spread and influence of U.S. values, including several democratic principles that they view as threatening to their regime. Russia is worried about instability in the wake of the Arab Spring; Russian leadership fears the possibility of similar grassroots, anti-government movements emerging, especially on social media. For example, after Russia’s 2011 legislative elections, Alexei Navalny, a Russian politician, used Facebook to coordinate protests with others that were disgruntled with the results. While this movement failed, Russia’s reaction proved their fear of freedom of speech in the digital era. A 2012 law declared NGOs that criticized the Russian government as “traitors” and spies.” With undermining western values as a core part of their posture, Russia has sought to undermine digital freedom and democratic discussion in the U.S. by inciting as much tension as possible. The government does this mainly through spreading fake news and information to create distrust in the system and foster

⁴⁸ Cass R. Sunstein, "Deliberative trouble? Why Groups Go to Extremes," *The Yale Law Journal* 110, no. 1 (2000): 71-119.

⁴⁹ Pablo Barbera and Gonzalo Rivero, "Understanding the Political Representativeness of Twitter Users," *Social Science Computer Review* 33, no. 6 (2015): 721-722.

instability.⁵⁰ The 2016 election is the most egregious example of Russian social media interference. For instance, according to evidence presented to the Senate Intelligence Committee in 2017, Russian social media accounts and bots had reached 126 million American users on Facebook. Russia uses a combination of individuals and bots as weapons in their information warfare. Kathleen Hall Jamieson, a professor of communication at University of Pennsylvania and founder of FactCheck.org, found in her research on Russian influence in the 2016 election that Russian trolls and bots used social media to target key demographics such as veterans and evangelicals that allowed the Trump administration to win. Their strategy had two purposes: to elect Trump, a candidate who represented a critique of the U.S.'s democratic system and to spur discord. She found that this was most apparent when looking at coverage of the presidential debates. Russian operatives would spread messages that either took Clinton's words out of context or acted as a megaphone for Trump's most divisive statements about Clinton's positions. While Russian resources would have a hard time modifying the views of those who had already decided on a candidate, they were successful in using media to sway undecided voters using rhetoric on immigrants, Muslims, and other Trump talking points. The targeted demographics ended up playing a large role towards Trump's victory, as voted from churchgoers, military families, and blue-collar workers greatly assisted Trump in Michigan, Pennsylvania, Wisconsin, and Florida.⁵¹ This shows the sheer power that a foreign country can have in American politics. Not only was Russia able to turn the tide of an election, they were also able to increase polarization in a critical moment in American politics. Without a doubt, more hateful speech was

⁵⁰ Nathalie Marechal, "Networked Authoritarianism and the Geopolitics of Information: Understanding Russian Internet Policy," *Media and Communication* 5, no. 1 (2017): 29-41.

⁵¹ Jane Mayer, "How Russia Helped Swing the Election for Trump," *The New Yorker*, September 24, 2018, <https://www.newyorker.com/magazine/2018/10/01/how-russia-helped-to-swing-the-election-for-trump>.

spoken online and more insular communities engaging in groupthink formed as a result of Russian interference in the 2016 election.

Finally, there are groups who wish to benefit off online tension to profit through advertising revenue. The internet era offers the opportunity for nearly anyone with access to a computer to create a website possibly to get advertising revenue from it. Advertising firms pay websites to display information about products and are often tailored to individual users or the general base that goes to an episode. Advertisers decide where to spend their funds based on the collectable data on how many people visit a website. To capture people's interest in gossip, scandal, and controversy, people wishing to profit off such characteristics will design fake news that can garnish the most clicks.⁵² Websites take advantage of advertising algorithms and user data to maximize their revenue from as many ads as possible, even if it encourages and promotes misinformation and tension. This has brought considerable criticism towards the advertising industry, though change is unlikely since there are thousands of advertising companies locked in a prisoner's dilemma whereby changing could provide their competitors a distinct edge.⁵³ Such behavior is problematic for encouraging a productive marketplace of ideas. It appears the free market has produced a situation where inciting tensions and driving people away from productive discussions is profitable.

b. A Less-Captive Audience

The second major change that social media has is the speed at which one is able to receive and spread information. The mass spread of technology has had profound impacts on how people learn and absorb information. With a growing preference towards digital information

⁵² Joanna M. Burkhardt, "History of Fake News," in *Combating Fake News in the Digital Age*, Library Technology Reports 53, no. 8 (2017): 5-9.

⁵³ Joshua A. Braun and Jessica L. Eklund, "Fake News, Real Money: Ad Tech Platforms, Profit-Driven Hoaxes, and the Business of Journalism," *Digital Journalism* 7, no. 1 (2019): 1-21.

over traditional print sources, digital sources develop a human's visual literacy, but the speed at which information can be delivered reduces deep learning and critical thinking.⁵⁴ This is a speed that has become expected and has formed a habit of getting through information quickly and efficiently. Psychological and neurological studies on the digital age's effect on our behavior and brain activity has shown that the internet has increased our reliance on skimming. This involves jumping in a reading to look for shortcuts and big ideas to get through it as fast as possible, leading to missing key parts of an article as the writer intended. The human brain was not naturally coded for vision or language; from an early age, one must develop the skills in order to read. In the internet age, the speed at which one can sift through information is causing people to take their developed skills and develop shortcuts to complete tasks in the most efficient way possible.⁵⁵ All these factors have made people more susceptible to demagoguery, misinformation, and hostile interactions. With critical thinking, empathy, and deep learning in retreat, our ability to productively interact with one another reduces substantially. Such changes are inconsistent with Mill's marketplace of ideas, as people are less likely to learn from each other's thoughts, posts, or ideas.⁵⁶ With the effect of less critical reading affecting everyone, this means that discussion will continue to suffer both on and offline. Coupled with the previously mentioned polarization, this development means that political insulation is amplified by people paying less attention to others' posts.

⁵⁴ Patricia M. Greenfield, "Technology and Informal Education: What is Taught, What is Learned," *Science* 323, no. 5910 (2009): 69-71.

⁵⁵ Maryanne Wolf and Catherine J. Stoodley. *Proust and the squid: The story and science of the reading brain*. New York: Harper Perennial, 2008.

⁵⁶ Maryanne Wolf, "Skim reading is the new normal. The effect on society is profound," *The Guardian*, August 25, 2018, <https://www.theguardian.com/commentisfree/2018/aug/25/skim-reading-new-normal-maryanne-wolf>.

III. A Possible Solution

a. Problems with Regulation

The majority of the policy debate surrounding the internet and free speech revolves around fixing social media through regulation by either the state or the social media companies. These types of approaches have received the most attention, because they seek to remediate tensions where they happen.⁵⁷ While creating a solution around social media would gain short term benefits, such mechanisms are difficult to implement, are likely to fail, and may restrict freedom of speech too much.

First, people do not want regulation on the internet. A Pew Research Center poll of 38 countries found that majorities in 32 of the countries, including 91% of Americans, say “us[ing] the internet without government censorship” is important; meanwhile, 69% of Americans find it very important.⁵⁸ If the government or a corporation were to substantially intervene by social media, there would likely be substantial backlash that would make such a move politically unpopular and likely affect the measure’s ability to be implemented. Especially in the wake of a very tense net neutrality debate, it is unlikely for politicians or companies to provoke backlash. As mentioned in section one, people are used to the internet being a free place of expression with minimal oversight, and such a sharp departure from the status quo would not be met with support.

Second, regulating through the web has had a lot of practical troubles. The only ones with the resources to monitor social media content are the social media companies themselves, which have had mixed success, mainly due to the sheer amount of content that needs to be monitored.

⁵⁷ Zachary Laub, "Hate Speech on Social Media: Global Comparisons," *Council on Foreign Relations*, June 7, 2019, <https://www.cfr.org/background/hate-speech-social-media-global-comparisons>.

⁵⁸ Richard Wike, "Broad support for internet freedom around the world," *Pew Research Center*, February 23, 2016, <https://www.pewresearch.org/fact-tank/2016/02/23/broad-support-for-internet-freedom-around-the-world/>.

Facebook has attempted to hire several contractors to monitor content, but investigative reporting has shown that rules are inconsistently applied, if at all.⁵⁹ Additionally, to appeal to as many markets as possible, social media sites have tended to side with authoritarian regimes and other forces in power in order to maintain market access to otherwise difficult to reach places. For example, Facebook will disproportionately monitor content that dissents with the Government in China for fear of being expelled from the country.⁶⁰ To overcome human error, social media companies have begun to employ artificial intelligence with limited success. As seen in Facebook's content monitoring in Myanmar, it is difficult to adapt operations to cultural and language differences.⁶¹

Third, there are concerns about what content would be regulated by a state. Defining "hate speech" is a difficult task that has a chance of over limiting speech or setting a precedent for further limiting speech.⁶² Even if a state or company attempted to regulate as fairly as possible, it would be likely to show bias; several studies have shown that artificial intelligence programs meant to sort search results and news feeds in nonpartisan ways have still had extremely biased results.⁶³ With this, there are increasing moral and legal fears on whether or not a corporation or the government could regulate in such a way. Many fear a slippery slope where such actors erode freedom of speech and the First Amendment.

⁵⁹ Ariana Tobin et al., "Facebook's Uneven Enforcement of Hate Speech Rules Allows Vile Posts to Stay Up," *ProPublica*, December 28, 2017, <https://www.propublica.org/article/facebook-enforcement-hate-speech-rules-mistakes>.

⁶⁰ Julia Angwin et al., "Facebook's Secret Censorship Rules Protect White Men From Hate Speech But Not Black Children," *ProPublica*, June 28, 2017, <https://www.propublica.org/article/facebook-hate-speech-censorship-internal-documents-algorithms>.

⁶¹ Steve Stecklow, "Why Facebook is losing the war on hate speech in Myanmar," *Reuters*, August 15, 2018, <https://www.reuters.com/investigates/special-report/myanmar-facebook-hate/>.

⁶² Niam Yaraghi, "Regulating Free Speech on Social Media is Dangerous and Futile," *Brookings Institute*, September 21, 2018, <https://www.brookings.edu/blog/techtank/2018/09/21/regulating-free-speech-on-social-media-is-dangerous-and-futile/>.

⁶³ Eytan, Bakshy, Solomon Messing, and Lada A. Adamic, "Exposure to Ideologically Diverse News and Opinion on Facebook," *Science* 348, no. 6239 (2015): 1130-1132.

Finally, regulation leads to groupthink. There is a fear from many that overregulation could lead to more insular groups. If left to a company, an autonomous software could attempt to change what a user views on the internet by only showing them agreeable content. This could range anywhere from one's social media page to changing what Google search results appears depending on the user. Any disagreeable content would be filtered out, leading to an insulated internet where instead of hostile engagements, people of differing opinions have no engagement.⁶⁴ This recreates and worsens groupthink and echo chambers on the internet while eliminating any democratic benefit of the internet.

b. Critical Media Literacy

A different approach would not place blame upon the internet but try to leverage it as a tool for more productive discussions. While policy discussions focus on the location of tensions by trying to fix the speaking platform of the internet, a different approach would tackle people's mindsets when using this platform. This paper advocates integrating critical media literacy into primary and secondary education. Critical media literacy involves a textual and audience reception interrogation of news, entertainment, journalism, and information using a variety of different critical lenses. The goal is not necessarily to push one lens of analysis over another, but to get students to interrogate their own ideas and opinions. In an age where the amount of information can often be overwhelming, it is important for students to gather research and critically think to discover underlying themes. This is not necessarily instructing by presenting information but presenting new ways of thinking about presented information. This has the possibility of making students better informed members of society who are more willing to

⁶⁴ Lee De-Wit, "Are Social Media Driving Political Polarization?" *Greater Good Magazine*, January 16, 2019, https://greatergood.berkeley.edu/article/item/is_social_media_driving_political_polarization.

grapple with big ideas.⁶⁵ By teaching students how to become better digital citizens, it increases the quality and quantity of productive engagements.

Critical media literacy would reduce many of the problems discussed in this paper. By engaging in such interrogation, the hope is that students will be better at analyzing their own shortcomings in conversations while also being more receptive towards the ideas of others, even if they disagree. Specifically, critical media literacy would build resilience to hate speech by having students contemplate appropriate responses, encouraging better content with a focus on disseminating to a wider audience and promoting social inclusion.⁶⁶ This reduces the effect of hate speech and groupthink since students will have a tendency to engage ideas rather than dismiss, preventing the creation of insular echo chambers that only communicate to the other side through unproductive cheap shots. This proposal also has a significant chance of reducing the effect of misinformation or biased partisan news, as it emphasizes that students analyze sources and methods before rendering judgement.⁶⁷ Compared to the listed problems with regulation, critical media literacy is a unique approach to the problems outlined in this section. It is not a direct change to how information is presented, nor does it have a chance of affecting internet freedom. By not being fixed based on changing the platform of social media, it focuses on how people can best use social media to converse productively.

An argument against critical media literacy in relation to fake news is that it fails to consider “both sides.” There is a concern that biases are inevitable when teaching critical media

⁶⁵ Douglas Kellner, "School Shootings, Violence, and the Reconstruction of Education—some Proposals," in *The Possibility/Impossibility of a New Critical Language in Education*, ed. by Ilan Gur-Ze'ev, (Rotterdam, Sense Publishers: 2010), 367-378.

⁶⁶ "The Role of Media Literacy in the Promotion of Common European Value and Social Inclusion," *All Digital*, http://all-digital.org/wp-content/uploads/2017/11/Medialiteracy-for-social-inclusion-Position-paper_FINAL.pdf, Accessed April 5, 2020.

⁶⁷ Goldberg, David. "Responding to Fake News: Is There an Alternative to Law and Regulation." *Southwestern Law Review* 47 (2017): 417-447.

literacy and that to truly give a child a holistic experience, one would have to consider all sides of any given position or analysis. This argument is wrong for two reasons. First, one “side” of a given issue can be so wrong that it can be excluded from curriculum. For example, when teaching about the Holocaust, *Night* by Ellie Wiesel is often used in the context of an English class. A teacher would not force the class to then read *Mein Kampf* by Hitler for the students to consider “both sides.” Further, a teacher would not share an article rife with misinformation to criticize it and then support it. Ultimately, there are perspectives that are so false and so immoral that a gray area does not exist. There are always time constraints with teaching, meaning some perspectives will inevitably not be included. This means that, in order to benefit students the most, perspectives with the most promise to promote education, truth, and productive engagement would be the focus of curriculum. Also, the alternative to not questioning media is considerably worse for whether “both sides” are considered. As previously mentioned, critical media literacy’s aim is to prepare students to be open and considerate of opposing positions. If one is worried about a certain perspective or creating a silenced minority, critical media literacy only has a chance of improving a hostile status quo.⁶⁸

Another argument against critical media literacy is that, no matter how much education is introduced, people will not agree. As much political psychology research has shown, the ability for people to build bridges is low, as people tend to rush to those of similar political leanings even for obvious non-political questions.⁶⁹ This means that, even if critical media literacy is introduced, people would still retain their partisan biases. While this is a credible answer, critical media literacy does not seek to eliminate all biases, but to increase the productivity of discussion

⁶⁸ P.L. King, “An Educator’s Primer,” in *Critical Media Literacy and Fake News in Post-Truth America*, ed. by Christian Z. Goering and Paul L. Thomas (Leiden: Brill Sense 2018), 7-24.

⁶⁹ Marks et al., Joseph. “Epistemic spillovers: Learning others’ political views reduces the ability to assess and use their expertise in nonpolitical domains.” *Cognition* 188 (2019): 74-84.

of people with different opinions. By engaging, people learn more about their own position and the position of others, creating the contest of ideas that Mill hopes for in his theory of a marketplace of ideas.

IV. Conclusion

In the future, online usage will only continue to grow. According to the International Telecommunications Union, global internet usage has had a rapid increase. Between 2005 to 2019, internet usage tripled.⁷⁰ Preparing future generations to be ready for the civil society of tomorrow will be ever important. Critical media literacy is a long-term solution that will not cause change right away nor fully solve the problems with the marketplace of ideas outlined in this paper; however, as of now we are not really trying; only a couple of colleges offer more than one course on critical media literacy and curriculum has yet to spill over to K-12 education.⁷¹ While most of the debate has centered around fixing social media, one has to realize that the only way to reverse the trend of intense partisanship that will accelerate alongside technology's growth is to make the next generation better than us. Criticism is important, but it must be tempered by the willingness to engage ideas with productive discussion. With so many intense problems on the horizon, it will be ever important for people to talk to each other in an honest marketplace of ideas.

⁷⁰ "Measuring Digital Development Facts and Figures 2019," *International Telecommunications Union*, 2019, <https://www.itu.int/en/ITU-D/Statistics/Documents/facts/FactsFigures2019.pdf>.

⁷¹ Jeff Share, "Preparing Educators to Teach Critical Media Literacy," *The SoJo Journal: Educational Foundations and Social Justice Education* 3, no. 2 (2017): 15-33.

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