



**COMMENTS OF THE  
EUROPE TECHNOLOGY POLICY COMMITTEE OF THE  
ASSOCIATION FOR COMPUTING MACHINERY\* ON  
“THE DIGITAL SERVICES ACT – DEEPENING THE INTERNAL MARKET AND  
CLARIFYING RESPONSIBILITIES FOR DIGITAL SERVICES”**

The [Association for Computing Machinery](#) (ACM) is the world’s largest and longest established professional society of individuals involved in all aspects of computing. It annually bestows the ACM A.M. Turing Award, often popularly referred to as the “Nobel Prize of computing.” ACM’s [Europe Technology Policy Committee](#) (Europe TPC) is charged with and committed to providing technical information to policy makers and the general public in the service of sound public policy formation. ACM and Europe TPC are non-profit and non-lobbying organizations.

Europe TPC intends to submit more detailed and potentially broader comments to the Commission ahead of a final determination regarding adoption of the Digital Services Act (DSA) but, for the record in this proceeding, presently wishes to underscore two key points – one general and the other quite specific – on which it anticipates elaborating:

- The success of the DSA will depend upon the ability of platforms and other regulated entities to successfully deploy automated content moderation systems. From a technical perspective, while the architecture and application of such systems vary, all have and will continue to have inherent limitations and biases that must be fully understood and appropriately safeguarded against in legislation if such systems are to be used to maximum and accurately predictable effect; and
- As detailed in Article 31, functioning of the DSA’s proposed regulatory regime will in no small measure depend upon non-governmental technical experts, referred to as “vetted researchers,” for the effective audit of platforms’ and others’ compliance with the Act. Such researchers and the utility of their work, in turn, will be dependent upon access to large data sets sourced from regulated platforms. As ultimately drafted, however, large numbers of otherwise qualified researchers should not inadvertently or by design be prevented from qualifying as “vetted researchers” by overly restrictive or imprecisely drafted provisions governing the secure storage of platform data received.

Europe TPC and the experts of the ACM Europe Council stand ready to assist the European Commission as negotiations on the DSA continue, both by consulting transparently and informally on technical matters as the process advances and in Europe TPC’s more detailed submission to come. For such assistance, please contact Chris Hankin, Chair of Europe TPC, at [c.hankin@imperial.ac.uk](mailto:c.hankin@imperial.ac.uk) and Adam Eisgrau, ACM’s Director of Global Policy & Public Affairs, at [eisgrau@acm.org](mailto:eisgrau@acm.org).

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\* Europe TPC’s work is further described in the Commission’s Transparency Register under “ACM-Europe” (Identification Number: 133002517679-87).