Opening Social Media

Restoring Innovation, Competition and User Agency under the DMA

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Table of Contents

Executive summary

Social Media: From Open Spaces to Dead Ends

Social media today is famously broken – unpleasant, even toxic, for millions of users who nonetheless stay on the services because they, along with their friends, colleagues, and family, feel trapped. It does not have to be this way.

Under the control of the world's largest technology companies, social media has turned into a dead end that concentrates unprecedented power. What began as open spaces for connection have evolved into vertically integrated monopolies, where one firm controls not just the network, but every functionality built on top of it: the algorithm that decides what users see, the moderation tools that determine what stays up, the search engine that governs what is findable, and the interface through which all of this is experienced. This is not a natural or essential outcome of technological development. It is the result of deliberate choices that have foreclosed competition across an entire ecosystem of adjacent markets.

> ***"A social network is not a monolith. It is a sum of functionalities (recommendation, moderation, search, data management) that could each be provided by different actors in a competitive market. Gatekeepers have deliberately blurred this line, and in doing so, built what are essentially monopolies over each functionality."***

The consequences are tangible. Users have no meaningful ability to choose how content is recommended or moderated, nor how their data is managed. Developers and organisations with alternative or complementary ideas (transparent recommendation systems, effective moderation tools, privacy-respecting interfaces) are locked out. And in the age of AI, this problem is becoming more acute: without intervention, the AI agents plugging into social networks will be those of the dominant firms themselves.

Our Proposal

This paper makes the case for opening social media to genuine competition again via a targeted, proportionate and legally viable approach. True portability and all sorts of interoperability are crucial because innovation should be able to take any form, whether as isolated functionalities on top of preexisting social media or as independent social networks. Aside from the possibility provided for in the Digital Markets Act (DMA) to extend horizontal interoperability to social networks and the implementation of portability under Article 6(9), **the European Commission could also envision the extension of Article 6(7) DMA to social networks, through a delegated act grounded in a market investigation under Articles 12 and 19**.

Article 6(7) DMA[1] currently requires gatekeepers to allow third-party providers to interoperate with operating systems and virtual assistants on equal terms. This has not been without challenges, but it has already demonstrated that innovation beyond gatekeeper control is possible. We propose applying the same logic to social networks: the connective infrastructure of user profiles, content, and links among them must be accessible to third parties who offer alternative or new functionalities on equal terms.

The objective is twofold. First, to enable any developer, researcher, or civil society actor to build new services on top of existing networks without having to construct an entirely new platform from scratch. This could be a community-driven recommendation algorithm, a specialised moderation tool, a privacy-respecting interface, or a functional search engine. Second, to give users agency over their digital environment: the ability to choose their own content filters, app interface, recommendation criteria, and moderation rules, rather than having a single provider's business model imposed on them.

Why This Approach, and Why Now

The DMA is currently undergoing its first review, with the European Commission (the Commission) required to publish its evaluation report by May 3, 2026. This creates a precise and time-sensitive window for action.

The legal pathway is clear and requires no new legislation or reopening the DMA. A market investigation under Article 19, identifying the barriers to contestability and innovation created by gatekeeper control over social network functionalities, would provide the basis for a delegated act under Article 12 extending Article 6(7) to social networks. The conditions of Articles 12(1) and 12(5)(a) are demonstrably met: gatekeepers deny third parties' access to the key input (i.e., the social network infrastructure as defined in Article 2(7)) and, in doing so, they erect barriers to entry that are insurmountable in practice.

Vertical interoperability under Article 6(7) targets individual functionalities. It means that an entrant does not need to build an entire competing platform but instead can climb the investment ladder – the principle that you can start competing on one rung (a single functionality) and expand your scope progressively, rather than being forced to build the entire platform from the outset. This is precisely the model that has driven innovation in many markets, from telecoms to banking.

The evidence is already there: where social networks operate under open conditions — as on Bluesky and Mastodon or on gatekeepers' social networks in the past — dozens of alternative applications, recommendation systems, and moderation tools have emerged. The absence of

[1] All articles cited in this paper refer to the DMA.

this ecosystem on gatekeeper-controlled networks is not a natural feature of the market, nor a reflection of user indifference; it is the consequence of exclusionary practices that a regulatory obligation can and should correct.

Proportionality and Process

Proportionality is built into the design of this remedy. Gatekeepers would be required only to provide interoperability access to defined functional components, calibrated to specific market failures. Technical specifications can be defined progressively through specification decisions, as shown by the Commission's existing Article 6(7) procedures in the *Apple* and *Google* cases.

Crucially, this process must not be conducted behind closed doors. Bringing true interoperability to social networks carries democratic stakes that go well beyond competition policy. Co-regulation involving the Commission, gatekeepers, alternative service providers, civil society organisations, technical experts, and affected communities should be standard: open hearings, multilateral consultations, and public decisions. Regulation understood in this way is not a constraint on innovation but rather the institutional precondition for it.

The Stakes

The Commission recently opened emergency antitrust proceedings against Meta for excluding third-party AI providers from WhatsApp while imposing its own AI service on all users. That same exclusion has already happened, invisibly, on social networks – so completely that the absence of alternatives has come to appear normal. It is not.

As gatekeeper-controlled AI threatens to extend existing monopolies into the next technological generation, the window for action is now. Extending Article 6(7) to social networks offers a path to foster innovation, strengthen European digital competitiveness, and restore meaningful user agency.

The Problem: Closed Systems and the Innovation Dead End

What began as open platforms for connection and innovation have, under gatekeeper control, become closed systems. Today, no one can build on top of them — and the innovation dead end this creates is no accident.

> ***"The innovation dead end on social networks is not a natural market outcome. It is the result of deliberate choices by gatekeepers to bundle, close and exclude. It can be undone."***

By exploiting network effects and closing their services, dominant social media firms have transformed communication into a platform-based, asymmetrical activity, in which only a little minority of users produce content, while platforms choose what the vast majority sees. And over time, they have consolidated monopoly power across nearly every aspect of their platforms, enabling them to set the rules, dictate trends, and effectively make or break competition in adjacent markets[2].

Misunderstanding social networks as a single, monolithic entity allows these firms to create a chokepoint for many activities. A better approach, aligned with the core DMA objectives, would unbundle social networks into distinct services — content moderation, algorithmic recommendations, search, migration tools, and more — each of which reflects a separate market where gatekeepers exert monopolistic control. Each of these functionalities could instead be provided by different actors, opening the door to innovation that better meets users' needs rather than those dictated by the gatekeeper's business model.

In emerging sectors, such as AI conversational agents, we can already see how damaging it is to exclude third-party providers from core platform services, such as messaging apps. In December 2025, the Commission initiated an emergency procedure under competition law — the ongoing *WhatsApp* case[3] — to allow other AI service providers to offer their services within WhatsApp, where Meta imposes its own AI on all users.

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[2] See for instance, E. Zuckerman, *How big is YouTube?*, Ethanzuckerman.com, December 22, 2023

[3] European Commission, *Commission opens antitrust investigation into Meta's new policy regarding AI providers' access to WhatsApp*, Ec.europa.eu, 4 December 2025. Case AT-41034. It describes as follows: *"The proceedings were opened with a view to adopting a decision in application of Chapter III of Council Regulation No 1/2003 and concerns the update of WhatsApp Business Application Programming Interface (API) terms, announced by Meta Platforms, Inc. in October 2025, that would prevent third party AI providers from offering their services through WhatsApp in the EEA, while Meta's own AI service, "Meta AI", would remain available through WhatsApp in the EEA."*

What we can see being contested on messaging apps today, we can no longer see on social networks – because lock-in has already happened. The battle was lost so gradually that having only one provider for every functionality — the gatekeeper — has come to seem natural. It is not. This innovation dead end is an anomaly. Search, moderation, recommendations, applications — these are all better thought of as functionalities built on top of a shared resource: user profiles, content, and the social graph. When gatekeeper AI plugs into that resource, the same logic applies and the innovation dead end will extend into the next technological generation.

Our objective: opening social network functionalities to competition

Our objective is twofold.

First, we want to empower third parties to provide users with services and experiences on top of existing social networks. From a developer's point of view, this means being able to connect third-party features to gatekeeper-controlled networks without needing to rebuild an entire platform from scratch.

Second, we want users to be free to choose their preferred interfaces, recommendation algorithms, moderation tools, search engines, content filters, and data management systems, rather than being confined to a single option imposed by the gatekeeper.

The Commission and most contributors to the debate currently distinguish horizontal and vertical interoperability[4]. Under this distinction, horizontal interoperability enables services at the same level (e.g., two messaging applications or two social networks) to communicate with

[4] See, for instance, the definitions in M. Bourreau, J. Krämer, and M. Buiten, *Interoperability in Digital Markets*, CERRE, March 2022, p. 14 et seq. As noted by the authors of the 2022 CERRE report, definitions of both vertical and horizontal interoperability can also be found in W. Kerber and H. Schweitzer, *Interoperability in the Digital Economy*, Journal of Intellectual Property, Information Technology and Electronic Commerce Law, 8(1), p. 41.
In many cases, other terms have been used to describe what is now understood as vertical interoperability. For example, when Arcep advocated opening operating systems to other marketplaces, it did not explicitly use the term 'interoperability', but argued for applying the principle of non-discriminatory access from ISPs to operating systems.
Others have pleaded for the unbundling of social networks. See for instance French Digital Council, *Social media: exploring the opportunity of unbundling. A conversation with Maria Luisa Stasi,* Cnnumerique.fr, 27 November 2023 and *Fostering the wealth of networks*, Cnnumerique.fr, 13 February 2024. See also Article 19, *Taming Big Tech: Protection expression for all*, January 2023.
From a technical standpoint, the boundary between the ways in which services interconnect can be blurred. While taxonomies may be both confusing and useful analytical tools, they should not obscure the ultimate purpose.

each other. Conversely, vertical interoperability allows functionalities to plug into an existing service (for example, an application on an operating system).

Vertical interoperability is provided for in Article 6(7). It states that

> *"The gatekeeper shall allow providers of services and providers of hardware, free of charge, effective interoperability with, and access for the purposes of interoperability to, the same hardware and software features accessed or controlled via the operating system or virtual assistant listed in the designation decision pursuant to Article 3(9) as are available to services or hardware provided by the gatekeeper. Furthermore, the gatekeeper shall allow business users and alternative providers of services provided together with, or in support of, core platform services, free of charge, effective interoperability with, and access for the purposes of interoperability to, the same operating system, hardware or software features, regardless of whether those features are part of the operating system, as are available to, or used by, that gatekeeper when providing such services.*
>
> *The gatekeeper shall not be prevented from taking strictly necessary and proportionate measures to ensure that interoperability does not compromise the integrity of the operating system, virtual assistant, hardware or software features provided by the gatekeeper, provided that such measures are duly justified by the gatekeeper."*

Without prejudging of the conclusion to be drawn about the extension of Article 7, we propose to extend this principle to social networks.

In practice, this would allow third parties to connect to social networks provided by gatekeepers to offer new services. It is a crucial remedy to many issues (reduced innovation, rent-seeking, user lock-in) stemming from the exclusionary behaviours of gatekeepers, which have enabled them to conquer markets and erect barriers to entry.

For each key feature of a social network controlled by a gatekeeper, third parties should be able to propose alternative solutions, and the gatekeeper should make these solutions as accessible as their own. Each functionality of a social network could then become a market, where numerous innovations could emerge to better meet user demand and deliver higher-quality services in many respects (data protection, freedom of expression, child protection, among others).

This approach is consistent with the goals of the Digital Services Act (DSA). While gatekeepers cannot be held liable for third parties' behaviour, the framework would nonetheless support DSA implementation by providing guidance on how to fix systemic risks upstream. Most

importantly, it would restore users' agency over what they see and why, and support diversity and values-driven innovation.

The opportunity: examples of new services

Examples of alternative functionalities and apps exist, demonstrating that new markets could flourish if the barriers raised by gatekeepers were taken down. Most often, these alternative functionalities and apps benefit from limited API access or were built adversarially, operating at the fringe of terms of use or confined to smaller networks. As a result, they cannot deliver their full potential. The following examples give a glimpse of what is emerging and could flourish at scale.

Personal data servers (PDS)

Function: User-controlled hosting of their social graph (contacts, relationships) and content, so data stays with them and can be reused across multiple services.
Example: Any PDS hosted by any user (managed or not by a hosting company) could store contacts and posts on a personal or community server, then sync them with different social networks or apps. In the Bluesky environment, Eurosky is one initiative showing the multiple benefits of PDSs.
Benefits: Users retain control of their data, can switch services without losing their social history, and reduce dependency on a single centralised provider.

Content moderation tools

Function: Tools that filter, flag, or hide certain content (harassment, hate, spam, etc.) and tailor the online environment to specific audience needs (minors, vulnerable groups, targeted communities).
Example: Bodyguard.ai offers real-time, AI-assisted moderation to detect and block toxic content on social networks, communities, and other platforms.
Benefits: Users and communities can protect themselves from toxicity, reduce exposure to violent or hateful content, and set moderation rules that align with their values and tolerance thresholds.

Recommendation algorithms

Function: Systems determining which content is featured in feeds, homepages, or suggestions.

Example: Tournesol.app offers an alternative to YouTube's video recommendation service based on community voting. But it cannot offer its service on any YouTube video because of limited access.
Benefits: Users benefit from more transparent recommendations focused on public interest rather than just maximising time spent or conflict-driven engagement.

Alternative mobile applications

Function: Applications offering a different interface to access the same service (e.g., YouTube), emphasising privacy, accessibility, or specific use cases (child protection, minimal distractions, etc.).
Example: Alternative apps that did not contravene legitimate requirements have long existed in many social media environments before being prohibited by gatekeepers. And where APIs still enable it, as on Mastodon or Bluesky, dozens of apps are proposed to users.
Benefits: Users can enjoy a different interface, enhance their safety, reduce data and battery consumption, etc.

Search engine tools

Function: Today, on most gatekeepers' social networks, it is almost impossible to search for content. Try to find a post you once saw on LinkedIn and this is immediately clear. The app's design does not help users find what they're looking for but makes them watch what is pushed to them. Users could use a working search tool for content, accounts, or interactions within a social network or across multiple platforms.
Example: Third-party search engines benefiting from commercial APIs already index public content from multiple platforms. Tomorrow, new products could address any social listening need beyond commercial or political activities.
Benefits: Users are no longer limited by biased or restricted internal search and can more easily find useful content not promoted by the dominant platform's algorithm.

Social data management and visualisation

Function: Tools analysing and visualising what major platforms show users (content types, sources, tone, potential biases) to make the digital environment more understandable.
Example: CNRS's Horus allows users to share their browsing data with independent scholars for research purposes.
Benefits: Users better understand how they're profiled, can choose whom to interact with, and navigate social networks in a more informed way.

In general, where vertical interoperability is allowed – on Bluesky and Mastodon, for instance, even with relatively few users – dozens of added-value services are already flourishing. These protocol-based systems show what is possible if gatekeepers could not block third parties from building on their networks.

Building on the first DMA review to extend Article 6(7) DMA to social networks

Having entered into force in 2024, the DMA is undergoing its first review, as provided for in its final provisions. The Commission has until May 3, 2026 to publish its first evaluation report. As stated in Article 53(3):

"*The evaluations shall establish whether it is required to modify rules, including regarding the list of core platform services laid down in Article 2, point (2), the obligations laid down in Articles 5, 6 and 7 and their enforcement, to ensure that digital markets across the Union are contestable and fair. Following the evaluations, the Commission shall take appropriate measures, which may include legislative proposals.*"

As part of this process, the Commission launched a public consultation in mid-2025, followed by the publication of a summary on January 15, 2026. Among the most significant requests from respondents, interoperability appears as a major priority.

According to Article 53(2), the Commission must also decide by May 3, 2026 whether the interoperability currently imposed on messaging services under Article 7 should be extended to social networks[5].

Article 6(7) appears to be a promising path, for several reasons:

1. The inclusion of social networks in the scope of the vertical interoperability provided by Article 6(7) would mitigate the natural monopoly of each platform over functionalities that could be better provided by third parties.
2. Article 6(7) may be extended through a delegated act under the market investigation procedure described in Articles 12, 19 and 49. This does not require reopening the text for legislative negotiation.

[5] See, for instance, Fiona Scott Morton et al., *Comments on the First Review of the Digital Markets Act*, February 2026 and CERRE, *Horizontal Interoperability of Social Networking Services*, Cerre.eu, February 2026.

3. It lowers barriers to entry: third parties can propose functionalities without having to build an entire social network from scratch. They can climb the investment ladder progressively.
4. It lowers barriers to user migration: It allows unsatisfied users to effortlessly move to a more satisfactory alternative for each functionality. New solutions could also help them to migrate more easily.
5. Precedents: Most digital markets were built on vertical interoperability. Where interoperability exists on social networks (on Bluesky and Mastodon), dozens of alternatives are already operational.
6. Risk mitigation: Vertical interoperability can offer users greater control over their data and how it is shared with third parties as well as with the platform itself.
7. Economic and societal progress: These advancements include fostering innovation, investment, and digital competitiveness while promoting user empowerment, privacy, and more open and diverse information ecosystems.

Assessing Article 12 DMA Conditions

Conditions to fulfil under Article 12(1) DMA

The legal pathway to extending Article 6(7) to social networks runs through Article 12(1), which empowers the Commission to adopt delegated acts to supplement the obligations laid down in Articles 5 and 6.

Such delegated acts must be grounded in a market investigation pursuant to Article 19, which identified the need to keep obligations up to date to address practices that "**limit the contestability of core platform services or that are unfair in the same way as the practices addressed by the obligations laid down in Articles 5 and 6**."

A single rationale unites the obligations set out in Articles 5 and 6: gatekeepers must not use their control over key resources or core features to foreclose adjacent markets or deny third parties equal access. Across these provisions, the nature of the practice at stake is identical: a gatekeeper controls a resource or infrastructure that is essential to participation in an adjacent market and must not weaponise that control to entrench its own downstream services at the expense of third-party competitors.

The practices of gatekeepers providing social network services replicate this very mechanism. By restricting access to APIs and data flows for an essential resource, gatekeepers prevent third parties from offering alternative or complementary services in markets that should exist and be competitive: content moderation, recommendations, internal search, user migration, data or social graph management.

The essential resource at stake is the core of the social network itself: the structured set of user profiles, content, and connections between them that constitutes, in the terms of Article 2(7), what a social network fundamentally is (see below).

Gatekeepers reserve access to this resource exclusively for their downstream services, foreclosing adjacent markets that would otherwise emerge on top of it and excluding third-party providers from competing on the merits. The mechanism is not merely analogous to the practices targeted by Articles 5 and 6; it is essentially the same mechanism, applied to a different core platform service also covered by the DMA and provided by designated gatekeepers. The Article 12(1) condition is therefore clearly met.

Practices that fall within the scope of Article 12(5)(a) DMA

A practice is covered by Article 12(5)(a), where it *"is capable of **impeding innovation** and **limiting choice** for business users and end users **because** it:*

*(i) affects or risks **affecting** the **contestability** of a core platform service or other services in the digital sector on a **lasting basis** due to the creation or strengthening of **barriers** to entry for other undertakings or to expand as providers of a core platform service or other services in the digital sector; or*

*(ii) **prevents** other operators from having the **same access to a key input** as the gatekeeper".*

Barriers to entry affecting contestability on a lasting basis (Article 12(5)(a)(i) DMA)

The need for an investment ladder

Barriers to entry in the social network market are, for all practical purposes, insurmountable. The only path technically available to a potential competitor is to build an entirely new social network from scratch. This undertaking requires not only considerable capital investment in technical infrastructure, but also the simultaneous resolution of two compounding challenges: user acquisition and content creation, both of which are necessary to generate the critical mass without which a social network has no value.

This is what makes foreclosure in this market structurally distinct from most other digital sectors. There is currently no investment ladder to climb: no entry point below the threshold of full platform construction, no intermediate market in which a third party could establish itself, grow, and progressively expand its scope. This absence of a progressive investment ladder is precisely the type of durable structural foreclosure that Article 12(5)(a)(i) is designed to address.

An extended version of Article 7 would address a different and complementary objective: enabling platforms to communicate with one another. Valuable as that is, it does not open the adjacent functional markets — recommendation, moderation, search — to third-party competition. Vertical interoperability under Article 6(7) addresses this distinct layer.

Contesting the Model, Not Just the Firms

Ensuring contestability on a lasting basis includes the ability to contest the dominant model proposed by incumbents, especially when it is based on predatory and exclusionary behaviours[6].

The existence of a handful of large social networks competing at the platform level does not demonstrate that these markets are contestable. Each of them has built its position through the same means: the capture and retention of end users through enclosure, addictive design, and the logic of the attention economy[7]. The capital and cross-subsidisation that sustain these platforms are, by any historical measure, without precedent.

The market exists only for firms capable of mobilising resources on a comparable scale, which, in practice, means it is closed to all but the largest corporations in history. This is not the contestability the DMA envisions[8]. True contestability requires the possibility of entry by actors operating on a different model altogether, actors whose value proposition rests not on capturing attention but on serving users more faithfully, whether through transparent recommendation, meaningful moderation, or genuine data sovereignty.

That possibility cannot exist as long as the social network remains closed. Opening access to the functionalities layered onto it is therefore not just a remedy for market foreclosure; it is a precondition for alternatives that move beyond the damaging attention economy, which no rivalry between the existing incumbents will ever produce.

Portability is also important, but alone it is not enough to counter network effects

Gatekeepers may protest that the DMA's existing portability duties under Article 6(9) provide all the opportunity that is needed for users to leave to competing services. This argument (redolent of Google's claim that competition in search engines 'is only a click away') suffers

[6] For a long and widely shared assessment of past conducts, see for instance the *Investigation of competition in digital markets* published in 2020 by the committee of the judiciary of the US House of representatives.

[7] For an overview, see C. Doctorow, *The Internet con. How to Seize the Means of Computation*, Verso, 2023.

[8] See for instance recitals 6 and 7 of the DMA.

from two defects: one, true portability has yet to be enforced. That would look like a simple "click to switch" function, facilitated by extending Article 6(7) to social media, and might well help spark more competition. Two, even real portability will, standing alone, not be enough. The self-reinforcing nature of network effects compounds this barrier on both sides of the market. On the demand side, users have weak incentive to migrate to a platform with fewer connections; on the supply side, content creators have no incentive to invest in platforms with smaller audiences. The result is a mutually reinforcing lock-in that any individual act of exit cannot dissolve.

Network effects are a collective phenomenon, and the ability of one user to export their data does not do enough to dissolve the gravitational pull of the incumbent's user base and content ecosystem for the millions of users who remain. Competing with dominant social networks requires attracting creators, an undertaking that is, for most new entrants, as difficult as building platform infrastructure itself.

History shows that where access is open, innovation flourishes

As well as the Bluesky/Mastodon examples canvassed above, history teaches that opening incumbent services sparks new entry. Open access unlocks innovation that closed systems cannot produce.

The *Microsoft* case established the foundational precedent: once the incumbent was required to open its platform, a generation of web browsers and alternative media players could be built on top of Windows, transforming closed monopoly into a platform for third-party innovation.

The same logic governed the opening of radio spectrum: by mandating access to previously exclusive frequencies, regulators unlocked a billion-euro industry built on Wi-Fi, enabling an ecosystem of devices, applications, and services that no incumbent would have produced alone.

More recently, Open Banking has shown that compelling financial institutions to grant third-party providers access to account data and payment infrastructure - the core resource of the banking sector - generates precisely the wave of innovation in financial services that incumbents had neither the incentive nor the interest to produce themselves.

In each of these cases, the pattern is identical: a dominant actor controls a resource on a lasting basis that constitutes a necessary input for the provision of adjacent services; access is denied or withheld; and once access is mandated on fair and non-discriminatory terms, firms can build on top of that preexisting resource, and a competitive market emerges.

Denial of access to a key input (Article 12(5)(a)(ii) DMA)

The key input: the social network, as defined by the DMA

It is necessary to return to first principles and ask what a social network is, according to the DMA. Article 2(7) defines an online social networking service as “a platform that enables end users to connect and communicate with each other, to share content and to discover other users and content across multiple devices and, in particular, via chats, posts, videos and recommendations.”

This definition captures the essential architecture of a social network: the ability for users to connect, communicate, share content, and discover other users, without extending to the full suite of functionalities that gatekeepers have progressively layered on top of this core. And this distinction matters enormously. The definition describes, in substance, a resource: a structured set of user profiles, content, and connections between them.

A misconception, cultivated by gatekeepers, of what a social network is.

Yet in practice, gatekeepers have systematically conflated the nature of what is a social network with the full range of functionalities they have chosen to offer on top of it. Moderation tools, recommendation algorithms, internal search engines, migration services, advertising systems, and application interfaces are not, as a matter of either law or technology, constitutive elements of a social network as defined in Article 2(7). They are services plugged onto it: functionalities that could, in a contestable market, be provided by any number of competing actors. By presenting them as inseparable from the social network itself, gatekeepers have constructed a legal and commercial fiction that serves to naturalise their monopoly over each of these adjacent markets.

This conflation is not accidental. It is the mechanism that maintains the innovation dead end. As long as moderation, recommendation, search, and social graph management are treated as intrinsic attributes of “the social network”, no third party can claim a right to offer alternatives to them without being seen as seeking to replicate the entire platform. The Article 2(7) definition dissolves this fiction: a social network is the connective infrastructure; everything else is a functionality that can, and under a contestability-oriented regulatory framework should, be open to third-party competition.

A clear denial of access

The core of the social network, as defined in Article 2(7), constitutes the fundamental input upon which the provision of any adjacent functionality or service depends. Without access to it, no third party can offer a meaningful alternative to a recommendation system, moderation

tool, search engine, migration service, or social graph management application, regardless of its merits.

Gatekeepers reserve exclusive access to this input for their own services while systematically denying third parties equivalent access. Initiatives that would qualify as “adversarial interoperability” ones show in practice the limits of the current situation:

- Tournesol.app, which offers a community-driven alternative to YouTube's recommendation algorithm, cannot extend its service to YouTube videos due to restricted API access.
- Wayfinder, a browser extension (soon to be released) that enables users to run an on-device, independent YouTube recommender algorithm, powered by an experimental content querying API.
- NewPipe, which provides a privacy-respecting alternative interface for YouTube, makes the best of the access offered under precarious conditions.
- Bodyguard.ai, a content moderation tool, cannot integrate seamlessly with major social networks because the necessary access is withheld.
- Perplexity AI conversational agent has a social filter from the start, but it cannot provide information based on recent content.

In each case, the innovation exists, and the demand is demonstrable, but access to the key input is denied.

This pattern is, in substance, identical to the situation now being litigated in the ongoing *WhatsApp* antitrust proceedings against Meta. What is being litigated under competition law in the context of messaging is, on social networks, no longer even visible as a problem, because the exclusion of third-party providers is so complete and so entrenched that the absence of alternatives has come to appear normal. It is not.

The capability to impede innovation and limit choice

The innovation dead end observed in gatekeeper-controlled social networks is no coincidence. Moderation, algorithmic recommendation, the application layer, the internal search engine, and migration tools are treated as a single indivisible package - a deliberate architectural choice that forecloses the emergence of competing or complementary solutions.

Any organisation (whether a company, a research institution, or a civil society body) that might otherwise develop a higher-quality, user-protective, or public-interest-oriented alternative to any of these functionalities is effectively excluded from doing so.

The result is a market structure in which innovation is monopolised by the gatekeeper, and in which users are denied the agency to choose their own moderation rules, content filters, or recommendation criteria, a limitation on choice that is both extensive in scope and durable in nature. The few illustrations above of alternative services offered by other players give only a glimpse of the opportunity we are missing to innovate and offer users choices. At the age of agentic AI, this is all the more true. Market adoption of conversational AI shows that only dominant, non-European players may reinforce their positions if they are the only ones with access to key resources: our social networks being the most critical among them.

> ***"Social networks are the infrastructure upon which the next generation of AI will be built. Who controls that infrastructure – and on what terms – is the defining regulatory question of this moment."***

Vertical interoperability under Article 6(7) DMA as an appropriate and proportionate remedy

Having established that the substantive conditions of Articles 12(1) and 12(5) are fulfilled, the question turns to the choice of remedy. For the reasons set out below, extending Article 6(7) to social networks constitutes an appropriate, proportionate, and legally robust pathway, without prejudice to the extension of Article 7 obligations to social networks.

An intervention at the level of individual functionalities, as vertical interoperability under Article 6(7), would proceed from a correct legal and technical premise: that the social network as defined by the DMA is an infrastructure, and that the functionalities built upon it are separate markets, each of which should be open to competition on the merits.

Targeting functionalities, not networks

Article 6(7) operates at precisely the right level of the value chain. As currently applied to operating systems, it requires gatekeepers to allow third-party applications and services to interoperate with their infrastructure on equal terms, recognising that the operating system is a platform upon which others should be free to build, not a closed product.

Extended to social networks, it would apply the same logic to social network services as defined by Article 2(7): the connective infrastructure of profiles, content, and links must be open to third parties wishing to offer alternative or additional functionalities on fair, reasonable, and non-discriminatory terms.

This functional decomposition is both analytically sound and practically effective. It reflects the DMA's internal logic, which recognises that gatekeepers exert monopolistic control not

only over core platform services but also over the individual markets those services encompass.

By opening each functionality as a discrete market (recommendation systems, moderation tools, internal search, migration services, social graphs), Article 6(7) creates an investment ladder that third parties can climb progressively, building first on targeted innovations before, where appropriate, expanding their scope of activity. This is precisely what is currently impossible without vertical interoperability: there is no entry point below the threshold of building an entirely new social network.

Proportionate by design

This opening of social networks to vertical interoperability would have to be done in a proportionate, incremental way, thereby limiting potential breaches of security and personal data. Alternative players could climb the investment ladder while Big Tech would only need to grant third-party access to specific functionalities, allowing others to build competing and complementary solutions.

Three considerations reinforce the proportionality of this approach.

First, the obligations must be specific and targeted. The fact that interoperability comes at no cost limits its scope and enables a progressive approach focused on functionalities that do not require costly access. Gatekeepers are not required to open their entire infrastructure indiscriminately, but only to grant interoperability access to defined functional components, calibrated to the market failures identified under Articles 12(5)(a)(i) and (ii).

Second, risks are structurally manageable: because access is granted at the functional level rather than the network level, the attack surface for security breaches and data leakage is significantly more limited than under full horizontal interoperability.

Third, the remedy is incremental and technically adaptable: specifications can be defined progressively through specification decisions, as demonstrated by the Commission's Article 6(7) procedures in the Apple and Google cases, allowing obligations to be calibrated, if need be, to the specific characteristics of each functionality and each gatekeeper.

Technical Specifications

The extension of Article 6(7) to social networks could lead to the adoption of technical and economic decisions. Technical specifications could be defined in specification decisions, just as in the *Apple* and *Google* Article 6(7) procedures. Such decisions could specify that the obligations should go well beyond simple API access, which gatekeepers can easily render unusable.

Building on past experiences, gatekeepers must indeed be prohibited from revoking or throttling access to competitors, imposing discriminatory rate limits or pricing, refusing interoperability with third-party services, blocking data portability or scraping without justification, self-preferencing their own APIs or tools, and leveraging prior voluntary data-sharing deals to exclude rivals. Beyond technical connectivity, the process by which social networks grant interoperability and access rights could also be specified, as in the *Apple* case.

A Democratic and Multilateral Process

Critically, this work must not be conducted behind closed doors, but in a multilateral, open, and therefore democratic way[9]. This is where regulation - meaning collectively enabling alternatives - becomes the extension of democracy, in the interest of both the economy and the people.

Co-regulation, involving not only the Commission and gatekeepers but also civil society, technical experts (as mandated by the delegated act procedure), and affected communities, should be the standard approach for defining these specifications. Open application processes, open hearings, multilateral meetings, and shared minutes would greatly help ensure all interested parties can contribute.

[9] To build on the experience gathered under Article 6(7) applied to operating systems, see, FSFE, The challenges of regulating interoperability. *Analysing Apple's request-based approach under the Digital Markets Act*, April 2026.

Relevant DMA Articles

Article 6.7: Vertical interoperability provision

The gatekeeper shall allow providers of services and providers of hardware, free of charge, effective interoperability with, and access for the purposes of interoperability to, the same hardware and software features accessed or controlled via the operating system or virtual assistant listed in the designation decision pursuant to Article 3(9) as are available to services or hardware provided by the gatekeeper. Furthermore, the gatekeeper shall allow business users and alternative providers of services provided together with, or in support of, core platform services, free of charge, effective interoperability with, and access for the purposes of interoperability to, the same operating system, hardware or software features, regardless of whether those features are part of the operating system, as are available to, or used by, that gatekeeper when providing such services.

The gatekeeper shall not be prevented from taking strictly necessary and proportionate measures to ensure that interoperability does not compromise the integrity of the operating system, virtual assistant, hardware or software features provided by the gatekeeper, provided that such measures are duly justified by the gatekeeper.

Article 12: Updating obligations for gatekeepers

The Commission is empowered to adopt delegated acts in accordance with Article 49 to supplement this Regulation with regard to the obligations laid down in Articles 5 and 6. Those delegated acts shall be based on a market investigation pursuant to Article 19 that has identified the need to keep those obligations up to date in order to address practices that limit the contestability of core platform services or that are unfair in the same way as the practices addressed by the obligations laid down in Articles 5 and 6.

The scope of a delegated act adopted in accordance with paragraph 1 shall be limited to:

(a) extending an obligation that applies only in relation to certain core platform services, to other core platform services listed in Article 2, point (2); (…)

5. A practice as referred to in paragraphs 1, 3 and 4 shall be considered to limit the contestability of core platform services or to be unfair where:

(a) that practice is engaged in by gatekeepers and is capable of impeding innovation and limiting choice for business users and end users because it:

(i) affects or risks affecting the contestability of a core platform service or other services in the digital sector on a lasting basis due to the creation or strengthening of barriers to entry for other undertakings or to expand as providers of a core platform service or other services in the digital sector; or

(ii) prevents other operators from having the same access to a key input as the gatekeeper; or

(b) there is an imbalance between the rights and obligations of business users, and the gatekeeper obtains an advantage from business users that is disproportionate to the service provided by that gatekeeper to those business users.

Article 19: Market Investigation into New Services and New Practices

The Commission may conduct a market investigation for the purpose of examining whether one or more services within the digital sector should be added to the list of core platform services laid down in Article 2, point (2) or for the purpose of detecting practices that limit the contestability of core platform services or that are unfair and which are not effectively addressed by this Regulation.

The Commission may, when conducting a market investigation pursuant to paragraph 1, consult third parties, including business users and end users of services within the digital sector.

The Commission shall publish its findings in a report within 18 months from the investigation launch. That report shall be submitted to the European Parliament and to the Council and, where appropriate, shall be accompanied by:
(a) a legislative proposal to amend this Regulation; or
(b) a draft delegated act supplementing this Regulation with regard to the obligations laid down in Articles 5 and 6.

Article 49: Exercise of the delegation

The power to adopt delegated acts is conferred on the Commission subject to the conditions laid down in this Article.

The power to adopt delegated acts referred to in Article 3(6) and (7) and Article 12(1), (3) and (4) shall be conferred on the Commission for a period of 5 years from 1 November 2022. The Commission shall draw up a report in respect of the delegation of power not later than 9 months before the end of the five-year period. The delegation of power shall be tacitly extended for periods of an identical duration, unless the European Parliament or the Council opposes such extension not later than 3 months before the end of each period.

The delegation of power referred to in Article 3(6) and (7), and Article 12(1), (3) and (4) may be revoked at any time by the European Parliament or by the Council. A decision to revoke shall put an end to the delegation of the power specified in that decision. It shall take effect the day following the publication of the decision in the Official Journal of the European Union or at a later date specified therein. It shall not affect the validity of any delegated acts already in force.

Before adopting a delegated act, the Commission shall consult experts designated by each Member State in accordance with the principles laid down in the Interinstitutional Agreement of 13 April 2016 on Better Law-Making.

About this report

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Over the last 20 years, he has served as Secretary General of the French Digital Council (Conseil national du numérique), as head of the national "Café IA" initiative, and as the advisor to the Chairman of Arcep. He was also a lecturer in digital law and regulation at several higher education institutions, including Aix-Marseille, Paris 8 Vincennes-Saint-Denis, Strasbourg, Panthéon-Assas Universities, l'Ena, and Sciences Po Paris.

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About FOTI

FOTI is a think tank dedicated to building a prosperous and fair European future that harnesses the power of technology. We help democracies shape a digital future that is open, fair, and accountable. We design market reforms, advocate for enforcement, and back credible challengers. We actively partner with builders, businesses, citizens, and democrats from across the political spectrum. We are independent, not-for-profit, and take no corporate funding. This report shall not engage or bind any person other than its principal author.