



i2Coalition Comment on FTC Request for Public Comment Regarding Technology Platform Censorship

The Internet Infrastructure Coalition (i2Coalition) represents companies that build and maintain the foundational layers of the Internet—including web hosts, domain name registrars and registries, DNS operators, cloud infrastructure providers, and data centers. Although the i2Coalition's policy portfolio does not include content moderation issues directly, we offer this comment to highlight an essential structural concern: regulatory efforts that conflate platform speech governance with the responsibilities of infrastructure providers risk undermining the stability, neutrality, and openness of the Internet itself.

We urge the FTC to:

1. **Maintain the integrity of Internet architecture.** The Internet depends on functional distinctions between application-level services—where user-facing platforms and content moderation occur—and the foundational infrastructure that enables global connectivity, such as DNS, domain registration, and hosting. Regulatory frameworks should avoid conflating these layers. Imposing content-based obligations on neutral infrastructure providers risks undermining the open Internet and enabling infrastructure-level censorship. We also emphasize that domain name registries and registrars do not host or control user content. These entities operate at a technical level, enabling access and routing without visibility into or editorial influence over content. Mischaracterizing their role risks assigning responsibility where no actual authority or involvement exists.
2. **Protect intermediary neutrality.** Core infrastructure providers must remain neutral conduits. Forcing or incentivizing them to engage in content-based decisions—whether through enforcement mandates, liability threats, or regulatory pressure—poses serious risks to privacy, free expression, innovation, and international interoperability. We have seen in other jurisdictions (e.g. Italy, India, Russia) how vague or expansive content rules have been misapplied to DNS operators, registrars, and hosting providers, resulting in disproportionate and often extraterritorial censorship.
3. **Avoid regulatory spillover.** The FTC's interest in deceptive or anti-competitive practices among dominant platforms should be narrowly tailored to avoid spillover into unrelated services that play no role in user-facing content moderation. For example, domain registrars and infrastructure hosting providers do not algorithmically boost or suppress speech, and should not be implicated in content-based investigations or enforcement frameworks.

In summary, while content moderation lies outside the i2Coalition's core policy focus, we strongly advocate for regulatory clarity that preserves the Internet's layered design and limits liability to the entities that actually make speech decisions, consistent with the First Amendment and law. Overreach in this space could unintentionally erode the foundational principles of the open Internet. We also encourage regulatory bodies to recognize the strengths of judicial oversight in navigating complex content moderation disputes. Courts, through case-by-case adjudication, are well-positioned to produce narrowly tailored outcomes that account for nuance and context. Overbroad or one-size-fits-all administrative rules risk unintended consequences, particularly when they extend to neutral infrastructure providers whose role is far removed from platform-level speech decisions.

Thank you for the opportunity to submit comments in this RFI proceeding. Please direct any questions about this submission to Christian Dawson, Executive Director, and Ann Morton, Senior Policy Director, i2Coalition, at [REDACTED].

May 20, 2025