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## We Hold These Distruths to be Self-Evident: How Legal History Could Save America from Itself

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## Abstract

This paper explores the threat of disinformation to American society. Focusing on social and cable news media as the primary disseminators of disinformation, it examines how the very design and nature of these two mediums promote and stimulate the intentional and viral spread of wholly inaccurate information as well as the significant and tangible negative consequences experienced across American society as a result. The paper subsequently proposes a legal solution to this dilemma in the form of a repeal of Section 230 paired with a reinstatement of the Fairness Doctrine. The background, history, and effect of each are thoroughly discussed, and the prevailing legal and policy arguments against their respective repeal and reinstatement are considered and countered in concluding that the proposed solution would, to some degree, likely promote a more civil and informed American society better equipped to confront modern challenges.

**Keywords:** disinformation; social media; Section 230; cable news; Fairness Doctrine

## The Threat of Disinformation

In the year 2021, the most significant existential threat to civilization is not pandemic, climate change, or nuclear war. It is disinformation. Specifically, it is viral disinformation spread forcefully throughout a disturbingly susceptible and unprotected public consciousness and tearing it apart like a silent but deadly illness viciously attacking a body's vital organs. Disinformation, as distinguished from misinformation by its intent, is defined currently by *Dictionary.com* (n.d.) as "deliberately misleading or biased information; manipulated narrative or facts; propaganda." The great irony, in the United States at least, is that the very innovations intended to promote, protect, and preserve truths while uniting a people now serve as the most effective and dangerous disseminators of disinformation and dividers of any common good or sense of community. Through today's American social and cable news media, individuals receive both a significant blessing and a curse: The opportunity to frame one's own unique reality, but to do so irrespective of any underlying actualities, facts, or truths. What inevitably results therefrom as individuals begin acting in real life under the auspices of their personally framed

narratives is a critical failure to communicate, to connect, and to compromise in the manner necessary for overcoming foreseen and unforeseen crises and progressing the human existence into the years, decades, and centuries ahead. Put plainly, social, and news media are brutally murdering American discourse, enlightenment, and resolve while obscenely profiting off of it and not nearly enough seem to notice, let alone care. Should it continue unchecked, it is not an exaggeration to consider that this very lucrative and relentless onslaught of disinformation could realistically erode the notion of a civilized and humane society over the generations to come.

Over 64% of Americans feel that social media is negatively affecting the country and its present direction generally, while 62% think that social media exerts too much control over the news Americans receive (Auxier, 2020; Grieco & Sheirer, 2019). Nevertheless, approximately 72% of Americans regularly use at least one social media platform, according to a Pew Research Center report from 2019. On average, these users spent two hours and twenty-four minutes per day on social media in 2020 (G., 2021), and 53% report receiving their news either "often" or "sometimes" through various social media-based outlets (Shearer, 2021). Many physiological and psychological researchers further conclude that much American social media use now constitutes an addictive condition rivaling substance abuse in terms of its magnitude and controlling impact on individual behaviors (Hou et al., 2019). Unsurprisingly, given this data, social media generated approximately \$36.14 billion in the United States alone during 2019 and projects to increase annual revenue to over \$50 billion by the close of 2021 (Guttman, 2020). Assuming social media freely presented an objective diverse inventory of accurate, thorough, and unbiased news and information, logic would dictate a reasonably informed, civically connected, and engaged American citizenry, given the technology's increasingly pervasive ubiquity. Sadly, over the past fifteen years, the proven reality differs significantly from the ideal where social media is concerned.

Those Americans relying primarily on social media for receiving their news are generally found to be far less engaged, informed, and correct on the actual facts underlying current events while also being far more susceptible to believing unproven or blatantly false claims (Mitchell et al., 2020). Best characterized by user feeds overflowing with more audiovisual content than the mind can process, including everything from news to paid advertisements to friends' staged photos to the latest viral cat video all easily shared by relatively unverified sources, social

media provides an all too fertile breeding ground for disinformation of various kinds (Menczer & Hills, 2020). It is estimated that falsities spread six times faster than truths on some popular social media platforms (Dizikes, 2018). Despite believing that they possess a strong functioning filter for inaccurate information (Barthel et al., 2016), 75% of "fake news" is genuinely believed by American social media users, even where the user possesses some prior knowledge of the reality involved (Silverman & Singer-Vine, 2016). Moravec et al. (2018) argue that this results from an individual user's "confirmation bias." That is if the user wants to believe what he, she, or they are reading or seeing, primarily because it aligns and resonates with closely held personal beliefs and/or opinions, the user is then inclined to feel validated in spite of any obvious fabrication or concrete evidence to the contrary (p. 4). Twenty-three percent of social media users additionally admit to either unintentionally, or even intentionally on occasion, posting or sharing untruthful content (Barthel et al., 2016).

Were all individual social media feeds populated by reasonably similar content tailored to their own perspectives and preferences but also included a diverse offering of different or opposing viewpoints, perhaps false and misleading information and news would be more easily questioned or, at the very least, readily identifiable. Unfortunately, by its very design and nature, social media further compounds and confounds the issue with its algorithms. Put simply, social media's algorithms forcefully serve users an increasing amount of what they "want" to see in an effort to maintain users' attention and translate said captivity into advertising revenue (Kim, 2017). For example, the more a user engages with specific types of social media content through clicks, reactions, shares, comments, or even simply hovering for a period of time, the more frequently that similarly natured content will appear in that user's feed. What results is a complete customization of a user's feed that may differ minimally, substantially, or entirely from another user's based wholly on personalized usage. Keegan (2016), in his *Wall Street Journal* report contrasting the social media feeds of self-identified conservatives and liberals once demonstrated that they were comprised of not only vastly different but also overwhelmingly opposed news and information. When utilized as an individual's primary vehicle for processing and engaging with society, social media, therefore, provides not a holistic worldview but rather one carefully curated through the lens of the individual and any accompanying myopic bias in a constantly reaffirming manner. Frequently referred to as "echo chambers," this function of social media

and its algorithms where users consistently receive increasing doses of only that which they are inclined to believe and none of which they are not divides society and, further, greatly diminishes the ability to listen, learn, debate, and collaboratively confront pressing challenges where necessary (Cinelli et al., 2021). Some attribute America's current extreme political polarization to this phenomenon and fear that the consequences, should it continue on its current course, could be catastrophic as reality is unable to be confronted where diverging constituencies influenced by social media can no longer agree on what a given reality actually is (Centola, 2020).

Similarly, cable news media outlets such as CNN, Fox News, and MSNBC are the primary news source for 49% of Americans (Shearer, 2018) and generated \$5.3 billion in revenue during 2018 according to the report, *Social media fact sheet* (Pew Research Center, 2019). Moreover, while 80% of Americans view cable news outlets as biased, inaccurate, or both, 62% nevertheless wholeheartedly believe and frequently repeat to others the information they receive from these sources (Knight Foundation, 2018). Analogous to social media, where Americans receive the same basic facts and are then left to form their own opinions, an organic protection from the spread of disinformation could very well emerge. However, cable news alternatively presents highly sensationalized entertainment intended to drive advertising profits for products and services targeted at a specific audience and consumer demographics rather than actual news meant to inform the public (Jones, 2012). In other words, the news an individual receives from CNN versus from Fox News or from MSNBC may differ as dramatically as the viewing of an NFL football game and an episode of *Real Housewives of New York* because the purpose is not to accurately inform but instead to attract and maintain specific viewership appealing directly to lucrative advertisers. During the recent Covid-19 Pandemic alone, well-documented and wide variations in individual attitudes, perceptions, and behaviors regarding the same world event are squarely attributable to the outlet from which cable news was consumed (Jurkowitz & Mitchell, 2020).

Beneath the surface, the stark differences in the biggest advertisers on CNN, Fox News, and MSNBC, respectively (Ariens, 2018), illuminate the reasons why. Much like the substance of NFL Football and *Real Housewives* function to grab and hold the attention of precise demographics long enough to present them with strategically fitted advertisements, cable news likewise allows watchers to have it

their way. Here viewers are presented "news" of the day in a highly editorialized narrative by a variety of hosts or pundits who are often dynamic and engaging larger-than-life personalities with little to no actual experience with or knowledge of the subject matter (Stencel & MacDicken, 2018). However, they frequently resemble intended viewers in appearances, biases, and opinions and are also empowered with the platform to freely and publicly endorse a viewer's perceptions on important issues irrespective of veracity and absent any true debate to the contrary. In doing so, they develop a consistent and repeated audience that is inherently or philosophically inclined to purchase some products and services not so coincidentally promoted regularly on that outlet and not others that may be promoted regularly on another with contrasting hosts, biases, etc. Cable news, therefore, essentially operates no differently than any other television-based entertainment vehicle driven by ratings to generate advertising revenue. Fox News even argued as recently as 2020 during *McDougal v. Fox News Network* in response to a defamation lawsuit that its own news content could not reasonably be taken seriously or viewed as anything other than entertainment. But while Pizza Hut advertisements during football games and Pantene commercials during female-driven reality television series may seem relatively innocuous, the same logic when applied to cable news grows extremely dangerous as viewers do not believe they are merely being entertained but actually consuming, and subsequently acting upon, bona fide facts and truths. Again, echo chambers expectedly emerge through the mass promulgation of disinformation to deeply divide, perhaps irreparably, an all too naive public in the ideals, purpose, values, and will to confront obstacles small and large, now and in the future (Martin & Yurukoglu, 2014). What was once the American institution long celebrated for discovering and disseminating truth to the people has now effectively been perverted by potential profit into arguably its greatest enemy.

Many prominent social media companies have recently taken steps to combat disinformation on their respective platforms while somewhat arrogantly pronouncing their ability to effectively police themselves (Paul, 2020). Similarly, cable news media has long sat comfortably behind a veil of self-proclaimed "journalistic objectivity" (Pressman, 2018). A cascading series of unfortunate events over the past five years has proven both to be rather poor self-evaluators. A 2018 Ohio State University study titled *Fake News May Have Contributed to Trump's 2016*, among countless others unreferenced in this paper, for example,

concluded that the spread of disinformation contributed significantly to the outcome of the 2016 presidential election (Gunther et al., 2018). Moving ahead to the COVID-19 pandemic, disinformation, found to spread faster than the deadly virus itself, caused and exacerbated devastating health crises on micro and macro levels (Barua et. al.). Finally, on January 6, 2021, the deadly insurrection on the U.S. Capitol could be directly attributed to a consistent and persistent barrage of disinformation spanning many months (West, 2021). These events provide, at the very least, circumstantial evidence that social media's self-guided reactive approach to disinformation oscillates between "too little too late" and "good decisions that take too long" (Paul, 2020), whereas the news media, inclusive of cable news programming, has exhibited inherent bias wherever profits are concerned for over a century (Pressman, 2018). Potential solutions to this dangerous dilemma, however, may not be as difficultly discovered as they appear on the surface. In fact, they have existed in some form of federal legislation and regulation within the past 35 years alone. Specifically, repeal of Section 230 of the 1996 Telecommunications Act ("Section 230") paired with a reinstatement of the Federal Communication Commission's ("FCC") "Fairness Doctrine" could serve to course correct this troubling and potentially, or perhaps inevitably, tragic trend. The remaining discussion of this paper will explore the history and impact of both Section 230 and the Fairness Doctrine and advocate that repealing the former and reinstating the latter would serve as a formidable starting point for vastly increasing knowledge of important current events and drastically decreasing deep divisions across American society.

### **Repealing Section 230**

In the relevant part, Section 230 provides immunity to internet sites for liability resulting from content posted by third parties. Passed in 1996 as part of the Communications Decency Act, itself residing within the Telecommunications Act of the same year, lawsuits against several major internet companies prompted congressional action to protect a fledgling internet and foster its continued growth as an informational resource readily accessible to the public. In doing so, legislators analogized the relatively young Internet to publishers and distributors of books nearly four decades prior. In 1959, criminal penalties imposed on the publishers and distributors of books containing obscene material led to the United States Supreme Court's ruling in *Smith v. California*. Although in *Smith*, the Court focused

its inquiry primarily on the criminal elements of specific ordinances, its holding has nevertheless been interpreted and applied as landmark protection of both freedom of speech and freedom of the press under the First and Fourteenth Amendments as well as absolving the publishers and distributors of third party content of any liability arising therefrom. Similarly, as codified in Section 230, "[n]o provider or user of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information content provider." This provision is now often referred to as "the twenty-six words that created the Internet."

While no express guarantee of publisher immunity exists within Section 230, courts have relied on legislative intent and precedents like *Smith* and its progeny to broadly imply and apply it where websites are involved. Specifically, a legal analysis known as the "*Barnes Test*," first articulated by the Ninth Circuit Court of Appeals deciding *Barnes v. Yahoo!, Inc.* in 2009, grants immunity where the following three prongs are satisfied: (1) the defendant must be a "provider or user" of an "interactive computer service," (2) the cause of action asserted by the plaintiff must treat the defendant as the "publisher or speaker" of the harmful information at issue, and (3) the information must be "provided by another information content provider," i.e., the defendant must not be the "information content provider" of the harmful information at issue. Section 230 defines "interactive computer service" itself directly within its text as:

[A]ny information service, system, or access software provider that provides or enables computer access by multiple users to a computer server, including specifically a service or system that provides access to the Internet and such systems operated or services offered by libraries or educational institutions.

Moreover, Section 230 defines "information content provider" as "[A]ny person or entity that is responsible, in whole or in part, for the creation or development of information provided through the Internet or any other interactive computer service."

Upon passage of the Communications Decency Act in 1996, the American Civil Liberties Union challenged its constitutionality in whole. When deciding *Reno v.*

*American Civil Liberties Union* the following year, the Supreme Court agreed in finding the Communications Decency Act, the majority of which related to online obscenities, unconstitutional in its entirety on First Amendment grounds with one glaring exception that it severed from the legislation and maintained as effective and enforceable law, Section 230. Shortly thereafter, the constitutionality of Section 230 was challenged directly before the Fourth Circuit Court of Appeals in *Zeran v. America Online, Inc.* (1997). In *Zeran*, extremists used the America Online internet server to celebrate the 1995 Oklahoma City Bombing through advertisements, comments, and other messages and effectively attributed the communications to plaintiff Kenneth Zeran who neither posted any of the content nor was connected in any way to those who did. Upon receiving threatening calls at his home, allegedly at a rate of one call every two minutes at its peak, and experiencing significant reputational harm, Zeran filed suit against America Online for publishing the damaging disinformation. Notwithstanding the immediate and longstanding trauma experienced by Zeran, the Fourth Circuit staunchly affirmed the intent behind Section 230 and dismissed his claims as precisely the sort of internet-based tort law actions Section 230 aimed to guard against as an impingement on free speech. Since *Zeran*, courts have routinely reinforced the protections of Section 230 as seemingly ironclad while the infant, relatively indigent Internet and its initial internet servers such as American Online have evolved into the social media of today, its ubiquitous usage and influence through smart technology, and its immense profitability. The lone dent in Section 230's armor came in 2008 when the Ninth Circuit decided *Fair Housing Council of San Fernando Valley v. Roommates.com, LLC*. There, the site *Roommates.com* was held liable for disinformation on its site contained within user profiles. However, *Roommates.com* differs from the majority of Section 230 cases in two respects. First, it involved unconstitutional housing discrimination and, second, said discrimination was based on information contained within profiles the site forced users to create by answering specific questions it asked by choosing from specific answers it provided. This supported the Ninth Circuit finding that it was not a publisher but, instead, a content provider outside of Section 230's scope.

Were Section 230 repealed, the spread of disinformation throughout social media would undoubtedly slow and, likely, cease entirely overtime on the preeminent platforms such as Facebook and Twitter. While algorithm-driven echo chambers may still exist, at the very least, the information within them would be infinitely

more accurate as these companies potentially face a raging flood of extremely costly lawsuits for actionable harms arguably caused by the disinformation published on their respective apps and sites. Within the past year, for example, an onslaught of personal injury and wrongful death complaints stemming from platform-published disinformation concerning the COVID-19 pandemic and the 2020 elections would translate into countless millions, and perhaps billions, of dollars in litigation costs alone regardless of the eventual outcomes. Such excessive legal fees assuredly force the major social media companies into active moderation and removal of posted disinformation based on a very reasonable fear of damaging downturns in profits and/or stock prices. Put plainly, by threatening social media companies financially, they are left with no choice but to enact strong measures and protections against the posting and spreading of disinformation on their platforms. In removing this primary conduit for disseminating disinformation, a more accurately informed society results presenting more opportunity for factually-based debate, compromise, and agreement and preventing avoidable tragedies before they occur. Absent this threat, a \$50 billion and growing industry is unlikely to take meaningful action on its own accord.

The prevailing argument against repealing Section 230 is that it amounts to government censorship and an unconstitutional abridgement of free speech under the First Amendment (Harmon, 2020). Yet, Section 230 itself recognizes that, in certain instances, no immunity for internet distributors and publishers of third-party content exists where protecting the public from some genuine harm is at issue. Recognizing the dangers posed to society by both child pornography and intellectual property infringement, Section 230's framers exempted both from the protections afforded in the statute. Although the previously discussed data and events occurring over the past five years illustrate the legitimate threat posed by disinformation shared on social media, it is also important to note that since the official beginning of the "social media age" in 2009, teen suicides and the number of teens at-risk of committing suicide have grown exponentially (Hurst et al., 2021), direct links between social media usage and severe depression across all demographics have been well-established (Aalbers et al., 2018), and individual and group productivity, both personal and professional, has decreased in some circumstances (Vithayathil et al., 2020). The foregoing examples only scratch the surface of what is now known as the "social dilemma" and desperately beg the question of whether social media is an institution worth protecting irrespective of

its utility as a venue for free speech given the diverse and increasing deluge of harms it presents in its current form. In fact, the U.S. Supreme Court's long line of First Amendment jurisprudence clearly recognizes that free speech protections are far from absolute, particularly in instances closely resembling the spread of disinformation on social media. In *United States v. Stevens* (2010), the Court acknowledged that "the First Amendment has 'permitted restrictions upon the content of speech in a few limited areas,'...including obscenity, defamation, fraud, incitement, fighting words, and speech integral to criminal conduct." Such restrictions are constitutional where a "compelling government interest" exists and the restriction itself is "narrowly tailored" to serve that interest. Repealing Section 230 is inarguably narrowly tailored to protecting Americans from the demonstrated threat of disinformation spread throughout social media.

Some perspective is necessary when forecasting the legality and potential repercussions of Section 230's repeal. Such legislative action would neither kill the Internet nor spawn an Orwellian state as alarmists would have the public believe. A repeal of Section 230 would have no effect whatsoever on the combative and corrosive comment boards, strategically posed selfies, myopic musings, and silly cat memes that have come to characterize "speech" on the Internet. Rather, it would simply hold websites financially responsible when individuals legitimately suffered legally actionable harm due to disinformation they allowed to be published and nothing more. Additional arguments involving the financial and technological practicalities of repealing Section 230 are similarly unpersuasive. As documented herein, the Internet of 2021 is countless lifetimes removed from the incubated curiosity that Section 230 was drafted to nurture back in the mid-1990s. As a \$50 billion dollar industry with algorithmic capabilities rivaling those born of Orwell's imagination themselves, effective and efficient moderation presents a readily accessible and reasonable task for large online technology companies. Where smaller outfits lacking the resources of Silicon Valley are involved, more valid concerns arise. Unfortunately, the spread and tangible threats of disinformation are equally rampant and real, if not more so, on fringe extremist platforms as they are on mainstream social media (Guess et al., 2020) and, therefore, they must be held to the same standard. Overall, however, where internet speech is concerned, if no disinformation exists on a site or, even if it does, no one is genuinely harmed by it, any repeal of Section 230 is a relative nullity for operators of all types and sizes.

## Reinstating the Fairness Doctrine

The Fairness Doctrine, somewhat less complicated than Section 230, was an obligation imposed on holders of broadcast licenses derived from a series of administrative rulings by the FCC beginning in 1949. It required simply "that discussion of public issues be presented on broadcast stations, and that each side of those issues must be given fair coverage" (*Red Lion Broadcasting Co. v. F.C.C.*, 1969). Replacing the FCC's earlier "Mayflower Doctrine," which prohibited editorializing generally on public radio waves, the Fairness Doctrine is also distinct from the still effective "equal-time rule" mandating that equal airtime be provided to opposing political candidates when requested. Rather, it afforded broad latitude to broadcasters as to the duration and manner in which contrasting viewpoints were presented. Over the decades, the Fairness Doctrine evolved and grew to encompass both the "personal attack rule" and "political editorial rule" together codified by subsequent FCC regulation (33 Fed. Reg. 5362-02, 1968). Consistent with the Fairness Doctrine itself and plainly put, each compelled broadcasters to comply with a series of arduous and tedious legal requirements in permitting aggrieved parties, attacked personally and/or editorialized against politically, an opportunity for response. In *Red Lion Broadcasting*, the Fairness Doctrine's constitutionality under the First Amendment came under attack from broadcasters but was affirmed by a unanimous Supreme Court holding its promulgation and enforcement within the FCC's statutory authority. Though seldom invoked, the Fairness Doctrine remained in full force and effect until 1984 when, in considering *F.C.C. v. League of Women Voters of California*, the Court upheld the policy but also overtly indicated that while the FCC could continue enforcing it that did not mean the FCC must or should continue enforcing it. *League of Women Voters* effectively signaled the end of the Fairness Doctrine as the FCC never again enforced it until it was officially removed from the Federal Register in 2011. In the ensuing timeframe, American cable news ballooned from small niche programming produced and viewed among like-minded individuals into the biased, ratings-driven, domineering entertainment behemoth existing today while proving pivotal in promoting partisan polarization across the country (Rendall, 2005).

Though the Fairness Doctrine differs from Section 230 in its legal complexity, the debate concerning its necessity and potential reinstatement is no less convoluted. As with Section 230, the central argument against reinstating the Fairness Doctrine

also involves the alleged abridgement of First Amendment free press and free speech protections. Unlike with Section 230, however, actual experience from past enforcement perhaps furnishes some evidence supporting this position. Any consideration of the Fairness Doctrine as a literal and direct affront to either free speech or a free press is wholly nonsensical given its very nature. Unsurprisingly, the Fairness Doctrine, while in effect, clearly succeeded in stimulating much holistic and informed public debate and discussion (Rendall, 2005). Issues arose rather where broadcasters encountered the determination of what constituted "public issues." The wide discretion granted to broadcasters at times resulted in airwaves flooded by public interest groups tied to everything from hobbies to religion and, in some instances, avoidance of covering plausibly controversial issues altogether out of a fear that equitably examining all perspectives may monopolize airtime and other resources entirely (Thierer, 1993). Nevertheless, developed and firmly rooted in the pre-contemporary cable news landscape, these arguments sorely lacked and still lack any foresight or awareness of the medium's evolution and influence. In particular, they failed and fail to acknowledge two key aspects entirely, that viewers would overwhelmingly rely on only one solitary source to receive supposed facts and information of public importance (Inscape, 2018) and that, aside from being completely one-sided, the supposed facts or information broadcast would be significantly and intentionally inaccurate.

Given this reality, any modern invocation of the Fairness Doctrine in America requires a more nuanced approach than a mere straightforward reinstatement. Well-versed in selectively covering "public issues" appealing to specific consumer demographics and not others after decades of practice, a fair coverage requirement may prompt further informational deviation of the public by cable news outlets not only in terms of viewpoint but also in terms of general awareness and knowledge. An outlet appealing to a specific political ideology, for example, may avoid reporting important public information entirely where doing so would involve presenting opposing evidence clearly demonstrating that the viewers' beliefs, logic, or understanding is completely erroneous with respect to that particular and pressing matter. Situations where proponents of an alternative but incorrect view fervently demand coverage opportunities in attempts to obfuscate underlying facts and truths also represent conceivable concerns, albeit less so as the Fairness Doctrine empowered broadcasters with the ability to choose precisely how contrary interpretations were imparted. Perhaps then the most pragmatic solution is to

provide cable news organizations with the choice of either adhering to the Fairness Doctrine or instead openly recognizing their respective content for what it actually is, a consumer entertainment commodity, and having it regulated as such. Shifting oversight from the FCC to the Federal Trade Commission ("FTC") under that scenario, cable news outlets would be forced to conspicuously label their content as directed by the Fair Packaging and Labeling Act. To the extent, cable news is a for-profit enterprise, and the factual information it claims to share is actually false, misleading, materially editorialized, or simply comprised mostly of plain opinion, the FTC could require prominent labeling of said content throughout a broadcast as "Not Factually Accurate," "For Entertainment Purposes Only," etc. In other words, faced with the choice of either presenting an opposing viewpoint or displaying a blatant disclaimer notifying viewers that the "news" they are consuming is not news at all and, transparently, more fiction than fact, the Fairness Doctrine likely presents a more inviting option. While cable news organizations controlling the time with and the manner in which opposing views are presented as well selecting stories to avoid damaging revelations remain viable threats, at the very least, viewers will be exposed to a different take on important issues which they likely would not have realized even existed otherwise and maybe begin approaching the content with some skepticism rather than unchallenged absolutism. This exposure, even minimally, may lead viewers to examine other sources to explore, to some degree, all sides of an issue and help protect against the further spread of damaging disinformation throughout society.

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