

Mr Prabhat Agarwal
Head of Unit for Digital Services CNECT.F.2, European Commission
Rue de la Loi 51, 1040 Brussels

19 January 2024

Re: Onboarding of online platforms on the EC Transparency Database for content moderation decisions

Dear Mr Agarwal,

I am writing to you on behalf of the Computer & Communications Industry Association (CCIA Europe), a trade association representing a broad cross-section of computer, communications, and internet industry firms. I would like to thank you for our previous exchanges on the Digital Services Act (DSA) [Transparency Database](#) for content moderation decisions to ensure the successful launch of this new tool.

Today, I am writing to you as all online platforms are required by the DSA to start sending their statements of reasons into the Transparency Database in less than a month, i.e. from 17 February 2024 onwards. Our members are concerned because they do not yet have access to the Transparency Database. We understand that the technical team in charge of the Transparency Database explained that the onboarding of online platforms would start in early 2024, but it still has not begun, despite repeated requests for access.

Given that access has not yet been provided, our members are reporting that they no longer have sufficient time to onboard and test before 17 February. **Could you please confirm that online platforms will be provided with a grace period of several months to the DSA's Transparency Database requirements, to allow sufficient time for onboarding and testing?**

In addition, our members have contacted your services, or their respective Digital Services Coordinators (DSCs), and received conflicting information concerning which regulator is tasked with onboarding online platforms on the Transparency Database. **Could you please confirm that our online platform members should go through a DSC for their onboarding to the Transparency Database?**

According to the FAQ on the Transparency Database website, onboarding should be done via DSCs. However, we wonder how this can be the case as most DSCs are yet to be appointed by Member States. If onboarding has to go through DSCs, this is an additional reason why most online platforms will not be able to do so before 17 February.

Should online platforms start their onboarding process in the coming month, we warn the European Commission that there will not be sufficient time for a testing period. Moreover, **if the onboarding of online platforms is done by DSCs, could the European Commission confirm that online platforms cannot be held liable if they are unable to start using the Transparency Database on 17 February due to the lack of onboarding?**

To accommodate the different timelines for DSC appointments at the national level, we suggest that the Commission introduces a grace period for online platforms until the

appropriate DSC is appointed and has onboarded platforms in their respective jurisdiction. An alternative solution would be to allow the European Commission to onboard online platforms to the Transparency Database. In both cases, we would ask the Commission to account for an appropriate testing period of at least eight weeks.

We hope that all parties involved can find a solution to ensure the smooth onboarding of online platforms to the DSA Transparency Database. CCIA Europe remains committed to contributing constructively to the Commission's work on the DSA's implementation.

Sincerely,

Mathilde Adjutor
Senior Policy Manager

About CCIA Europe

The Computer & Communications Industry Association (CCIA) is an international, not-for-profit association representing a broad cross section of computer, communications, and internet industry firms.

As an advocate for a thriving European digital economy, CCIA Europe has been actively contributing to EU policy making since 2009. CCIA's Brussels-based team seeks to improve understanding of our industry and share the tech sector's collective expertise, with a view to fostering balanced and well-informed policy making in Europe.

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