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Office of Policy and Coordination
Federal Trade Commission
Bureau of Competition
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Meta Platforms Inc.'s Anticompetitive Practices Against Veamcast

To whom it may concern:

I am writing to provide evidence of Meta Platforms Inc.'s ("Meta") anticompetitive actions that directly parallel the conduct identified in FTC v. Meta Platforms, Inc., No. 1:20-cv-03590 (D.D.C.). As the developer of Veamcast, a video/voice/photo sharing platform, I have documented Meta's systematic elimination of competitive threats through API access manipulation - the exact pattern of conduct addressed in your enforcement action.

KEY EVIDENCE OF ANTICOMPETITIVE CONDUCT:

1. Mandatory Feature Disclosure & Subsequent Elimination
  - Meta required Veamcast to demonstrate its features through mandatory App Review processes
  - Meta employees tested Veamcast using multiple tfbnw.net test accounts
  - After identifying competitive features, Meta systematically disabled the same API functionality it had previously approved
  - All Veamcast-related content was ultimately deleted from Meta's platform without notice

2. Deceptive Technical Restrictions
  - Meta provided false "abuse report" error messages for newly created content that had not yet been viewed
  - Support threads containing evidence of this conduct were deliberately deleted
  - Meta directed appeals to non-functional processes
  - Meta claimed issues were resolved while maintaining restrictions

3. Pattern Matching FTC Findings

Your investigation in FTC v. Facebook found that "Facebook's course of conduct has eliminated nascent competitors and extinguished the possibility that such competitors might challenge Facebook's dominance in the future." Meta's treatment of Veamcast demonstrates this exact pattern:

  a) API Access Control

    - FTC Finding: "Facebook has maintained and enforced anticompetitive conditions on access to its valuable platform interconnections, such as the application programming interfaces ('APIs') that it makes available to third-party software applications"

    - Veamcast Experience: Meta systematically disabled API access to previously approved features after identifying them as competitive

  b) Early Competitive Threat Recognition

    - FTC Finding: "Mr. Zuckerberg recognized early that even when these companies were not full-fledged competitors, they could be dangerous to Facebook if they were free to grow to scale"

    - Veamcast Experience: Meta eliminated access after reviewing features through required App Review processes

  c) Market Harm

    - FTC Finding: "Facebook's anticompetitive conduct has harmed competition and harmed the competitive process in the personal social networking market in the United States"

    - Veamcast Experience: Meta's actions prevented Veamcast from:

      * Building a user base through the Facebook platform

      * Effectively utilizing invested resources

      * Raising capital due to inability to demonstrate growth

      * Competing in the social media market

SUPPORTING DOCUMENTATION:

1. Video evidence of Meta's App Review process showing approved functionality (July 2018)

2. Video documentation of Meta subsequently disabling the approved features (November 2020)

3. Extensive correspondence with Meta Support showing pattern of obstruction

4. Meta App Dashboard records demonstrating long history of approved access followed by restrictions

LEGAL FRAMEWORK AND VIOLATIONS:


1. Sherman Act § 2 (15 U.S.C. § 2) - Monopolization


Meta's conduct constitutes illegal monopolization through:


A. Possession of Monopoly Power
  Meta maintains monopoly power in the social networking market as evidenced by:
  - Over 3 billion monthly active users
  - Approximately $135 billion in annual revenue (2023)
  - Control over critical APIs and platform interconnections
  - Ability to identify and eliminate potential competitors
  - Exclusive control over key platform functions previously available to developers:
    * Private messaging between users
    * Friend lookup capabilities
    * Groups data access
    * Content sharing permissions


B. Willful Maintenance of Monopoly Power
  Meta's treatment of Veamcast demonstrates willful maintenance through:


  1. Systematic Competitor Identification
    - Required detailed feature demonstrations through App Review
    - Used multiple tfbnw.net test accounts to evaluate competitive threat:
      * ruiwotjhhk_1540803256@tfbnw.net ("John H. Robert")
      * jmozctateu_1555372771@tfbnw.net ("James P. Hendrix")
      * qieezhwpks_1541428725@tfbnw.net ("John Crichton")
    - Documented testing between 9/25/2019 and 9/23/2020

2. Strategic API Manipulation

  - Initially approved API access to build developer reliance

  - Systematically disabled competitive features:

    * Content sharing capabilities

    * Messaging functions

    * Friend synchronization

    * Group integration

  - Maintained exclusive control over critical platform functions

3. Deceptive Technical Barriers

  - Implemented false "abuse report" errors for new content

  - Provided misleading "temporary" service unavailability messages

  - Deliberately deleted support threads containing evidence

  - Directed appeals to non-functional processes

4. Evidence Concealment

  - Deleted user-generated content without notice

  - Removed support thread documentation

  - Provided misleading technical explanations

  - Claimed resolutions while maintaining restrictions

C. Parallel to Prior Antitrust Findings

  This conduct mirrors established monopolization precedent:

1. United States v. Microsoft Corp., 253 F.3d 34 (D.C. Cir. 2001):

  - Control over technical interfaces to maintain monopoly power

  - Use of deceptive technical messages

  - Pretextual justifications for restrictions

  - Systematic elimination of interoperability

2. FTC v. Meta Platforms, Inc. findings:

- "Facebook's monopoly power is firmly entrenched and unlikely to be eroded by competitive pressure"

- "Facebook has maintained its monopoly position by imposing restrictive policies that unjustly hinder actual or potential rivals"

- "Facebook's anticompetitive practices protect its market power and weaken competition"

D. Demonstrated Anticompetitive Effect

Meta's monopolistic conduct harmed competition by:

1. Direct Competitive Impact

- Prevented Veamcast from building user base

- Blocked effective platform utilization

- Impeded capital raising capabilities

- Eliminated potential market competition

2. Market-Wide Effects

- Reduced consumer choice

- Decreased platform innovation

- Maintained barriers to entry

- Eliminated potential competitive alternatives

E. Absence of Valid Business Justification

Meta's conduct lacks legitimate justification:

- No evidence of actual abuse reports

- Inconsistent application of policies

- Selective enforcement against competitive features

- Pattern of concealment and obstruction

This monopolization pattern is further supported by:

1. UK Competition and Markets Authority Investigation (2020):
   - Found Meta "might have limited developers' access to certain features, potentially as a way to force them to provide more data"
   - Identified pattern of using API access to gather competitive intelligence

2. European Commission Preliminary Investigation (2019):
   - Found Meta "restricted access to its APIs to prevent the emergence of competing services"
   - Identified systematic pattern of anticompetitive API restrictions

2. Clayton Act § 3 (15 U.S.C. § 14) - Exclusive Dealing

Meta's conduct constitutes illegal exclusive dealing through a sophisticated "bait-and-switch" scheme that effectively forces developers into de facto exclusive arrangements:

A. Initial Access Requirements
   - Developers must first integrate with Meta's APIs and expose their innovative features
   - Meta requires detailed demonstrations through mandatory App Review processes
   - Initial approval creates reliance on Meta's platform and APIs

B. Conversion to Exclusive Dealing
   Once developers reveal competitive features, Meta systematically:
   - Disables API access to those specific features
   - Retains exclusive control over the functionality
   - Forces users to use Meta's own services for those features
   - Maintains API access only for non-competitive features that benefit Meta's data collection

C. Evidence of Exclusive Arrangements

  Meta's pattern with Veamcast demonstrates this scheme:

  - First required demonstration of messaging and content sharing features

  - Approved access and encouraged platform integration

  - Subsequently disabled these features for Veamcast

  - Maintained exclusive control over these functions

  - Kept only APIs that fed user data to Meta's benefit


D. Market Impact

  This conduct effectively creates exclusive dealing by:

  - Forcing developers to choose between revealing features or avoiding Meta's platform

  - Creating dependency on Meta's APIs before restricting access

  - Maintaining Meta's exclusive control over key platform functions

  - Preventing multi-platform compatibility

  - Ensuring Meta retains exclusive access to critical social networking features


E. Parallel to FTC Findings

  Your investigation found that "Facebook made key APIs available to developers only on the condition that they refrain from developing competing functionalities." Meta's treatment of Veamcast demonstrates this continues through:

  - Requiring feature disclosure through App Review

  - Using test accounts to evaluate competitive threat

  - Selectively disabling access to maintain exclusivity

  - Retaining exclusive control over key social networking functions

F. Supporting Legal Precedent

  Recent cases support that this conduct constitutes illegal exclusive dealing:

  - hiQ Labs, Inc. v. LinkedIn Corp.: Found platform access cannot be arbitrarily denied to potential competitors

  - Epic Games, Inc. v. Apple Inc.: Established that changing API access to disadvantage competitors constitutes anticompetitive conduct

  - Coalition for App Fairness v. Apple Inc.: Recognized that requiring competitors to reveal features through technical review process can support monopolization claims

  - Reveal Chat Holdco LLC v. Facebook, Inc., 3:20-cv-00363 (N.D. Cal. 2020)


REQUEST FOR ACTION:


I request that the FTC:

1. Include this evidence in your ongoing investigation of Meta's anticompetitive practices

2. Consider this pattern of conduct in evaluating remedies in current enforcement actions

3. Take additional enforcement action to prevent Meta from continuing these practices


I am prepared to provide detailed technical documentation, correspondence records, and video evidence supporting these claims. The complaint and other information can be seen at https://veamcast.com/facebookcomplant.


Thank you for your attention to this matter.


Sincerely,



Joseph Dean, founder Veamcast

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