

Exhibit 7

**META PLATFORMS, INC.'S CONFIDENTIAL RESPONSE TO
INTERROGATORY SPECIFICATION NO. 42 (FOR FACEBOOK,
INSTAGRAM, AND WHATSAPP) IN THE FEDERAL TRADE
COMMISSION'S CIVIL INVESTIGATIVE DEMAND,
DATED MARCH 14, 2022, FTC FILE NO. 2223006**

INTERROGATORY NO. 42

Describe in Detail the Company's processes, if any, for complying with the COPPA Rule when a User's age is calculated, Estimated, or inferred to be younger than 13 years old on a Metas Platform, except for the Platforms identified in response to Interrogatory Specification No. 36.

RESPONSE TO INTERROGATORY NO. 42

Facebook and Instagram

Meta does not generally calculate, Estimate, or infer ages under 13 years old. The only exceptions are the new age verification options Instagram began testing in the U.S. in June 2022 (i.e., face-based age prediction and social vouching), which are described in Meta's response to Interrogatory No. 39. However, Meta does have processes in place for (I) identifying users who may be children under 13 ("Children") and (II) removing Children from Facebook or Instagram.

I. IDENTIFYING ACCOUNTS POTENTIALLY BEING USED BY CHILDREN UNDER 13

Meta employs several methods for identifying users on Facebook and Instagram who may be Children.

A. Online Reporting

Anyone, including individuals who do not have a Facebook or Instagram account, can report to Meta that a user is or appears to be under the age of 13 by filling out a platform-specific online reporting form.¹ While users are able to access these reporting forms via in-app browser directly from the Facebook and Instagram apps, Meta makes these reporting forms available to anyone via web browser, regardless of whether they use any of Meta's services, in order to provide parents, guardians, teachers, and anyone else without an account the ability to report a potentially underage account to Meta. Meta has also begun testing with a small

¹ The third-party reporting form is available at <https://help.instagram.com/contact/723586364339719>; <https://www.facebook.com/help/contact/209046679279097>.

CONFIDENTIAL TREATMENT REQUESTED UNDER 5 U.S.C. § 552(b)(4); 15 U.S.C. § 46(f); AND/OR 15 U.S.C. § 57b-2

number of users a new mechanism for reporting users via a reporting button directly in the Instagram app.

B. Internal Reviews

Meta trains tens of thousands of human reviewers to review accounts that are reported by other users for potentially violating the applicable terms of service and content guidelines. In the course of reviewing these accounts in response to any type of report, a reviewer may notice certain details suggesting that the account holder may be a child under 13 (e.g., photos posted to the account reflecting age or text in the account bio stating an age under 13), in which case the reviewer will escalate the account for underage review.

C. User Self-Reporting

Meta may learn that a user is underage directly from the user, if the user attempts to change the date of birth on their account to a date that would make them under 13. In this case, the user is automatically placed in an age checkpoint,² and must provide sufficient proof that they are old enough (i.e., 13 or over in the United States) to use Facebook or Instagram before they will be permitted to continue to use the service.³ Additionally, if a user attempts to change their age from under 18 to over 18 and uses Yoti's age verification technology (described in Meta's response to Interrogatory No. 39), and that technology predicts that the user is under 13, the user will automatically be placed in an age checkpoint.⁴

D. Cross-Platform Checks

As of December 2021 when a user's Facebook or Instagram account is placed in an age checkpoint, Meta will simultaneously suspend any other accounts that have been added to the same Accounts Center.⁵ For example, if a user's Instagram account is placed in an age checkpoint, and that user also has a Facebook account in the same

² An age checkpoint is when a user is prohibited from accessing their Instagram, Facebook, or Meta account until they provide adequate documentation that they are at least 13 years old.

³ A list of identification that users may use to prove their age can be found at <https://www.facebook.com/help/159096464162185> and <https://help.instagram.com/271237319690904>.

⁴ As described in Meta's response to Interrogatory 39, between June and September 2022, Meta tested "social vouching" as an age verification method for Instagram users who attempted to change their age from an under 18 to an age over 18. With social vouching, a user could elect to ask three mutual followers to confirm the user's age. If any of the three vouchers stated that the user was under the age of 13, the user would also automatically be placed in an age checkpoint.

⁵ Meta offers the Accounts Center, which provides a settings dashboard where users can centrally manage their Facebook, Instagram, and Meta accounts, including for purposes of choosing whether to enable connected experiences, such as single sign on and cross posting, for those accounts at any time.

Accounts Center, then the user's Facebook account will also be suspended. As of August 2022 with the rollout of Meta Accounts, a user's Facebook or Instagram account will be suspended when the user's Meta account is placed in an age checkpoint.⁶

II. REVIEWING ACCOUNTS IDENTIFIED AS POTENTIALLY USED BY CHILDREN

Accounts flagged through the processes outlined above are evaluated either by an automated process or through human review, and in some cases both.

A. Automated Evaluation

An account that has been flagged as potentially underage will go through an automated process that determines whether the account should be escalated for human review or immediately actioned. As described below, Meta leverages its automated technologies to filter out accounts that can be actioned without manual review to ensure that human reviewer resources are prioritized for accounts that do need manual review.

The automated actions that the system can take on its own are either (i) placing the account in an age checkpoint or (ii) allowing the account to continue using the Platforms.

1. Automatically placed in an age checkpoint

In some cases, Instagram and Facebook account holders are automatically placed in an age checkpoint without additional review from a manual reviewer. Most commonly, this occurs with users who self-report that they are under 13 by changing the age on their account. Because these users have themselves indicated they are under 13, Meta will presumptively determine that these users are too young to use the service, absent additional proof of age. A user who has been placed in an age checkpoint has the opportunity to appeal and recover access to their account if they can demonstrate they are old enough to use Facebook or Instagram by providing adequate documentation that they are at least 13 years old.

2. Automatically permitted to remain on the app

Where Meta has indicia that the user is not under the age of 13, Meta may automatically permit the user who has been flagged as potentially underage to

⁶ In very limited circumstances where a user has a Meta account and Instagram account in the same Accounts Center, but not a Facebook account, the user's Meta account will not be suspended.

continue using Facebook or Instagram.⁷ This can occur in any of the following circumstances: (1) machine learning models have predicted the user is over the age of 18⁸; (2) a human reviewer previously evaluated the account for potential underage usage and approved the user to continue using the platform following the review (pursuant to review guidelines detailed below); (3) the account was previously placed in an age checkpoint and the user submitted sufficient documentation demonstrating they were at least 13 years old; or (4) the account is so old that it could not reasonably belong to a user under 13 (e.g., the account was created 13 years ago). A flagged account will also be permitted to remain on the platform if the account contains no bio or photos, because, as discussed below, a reviewer relies on this data to evaluate whether the account belongs to an underage user.

B. Manual Review of Potentially Underage Accounts

Flagged accounts that cannot be resolved through the automated processes described above will be directed to human reviewers for further evaluation. Meta employs tens of thousands of human reviewers whose duties include reviewing these Facebook and Instagram accounts to manually look for signs that an account has violated the applicable terms of service or content guidelines, including accounts suspected as belonging to users under 13.

All potentially underage accounts that are manually reviewed are reviewed using Meta's content review platform, which is specifically designed for large-scale manual review efforts. The platform standardizes the underage review process and allows Meta to track and properly document decisions made. To ensure that the human review process is consistent and that reviewers evaluate each profile using the proper criteria, Meta's content review platform provides reviewers with a "decision tree" or standardized flow that they must follow for each flagged account. Reviewers are also able to include notes and provide additional context for why they made a particular decision.

⁷ There are no automations in place that will automatically allow users of Meta accounts to remain on the platform. Oculus users will either (1) be automatically placed in an age checkpoint through an automation or (2) be reviewed by a human reviewer.

⁸ As described in Meta's response to interrogatory 39, the Company uses machine learning to predict the likelihood that a user is over or under 18 years old. This involves looking at signals such as people wishing the user happy birthday and the age written in those messages (e.g., "Happy 21st Bday!" or "Happy Quinceañera"), the average stated age of a user's friends, posts a user has liked, and accounts the user follows (e.g., a user who follows a hardware store is more likely to be an adult). Understanding whether a user is an adult allows the Company to prevent users under 18 from accessing certain features (e.g., Facebook Dating) and provide additional privacy options to younger users.

- **Step 1: Account Bio.** For Instagram, reviewers first evaluate the account's bio for contextual information or self-admission about a user's real age, including a written statement of the user's age, birth date, or grade in school. Reviewers are also trained to look for additional signals that indicate whether the account holder is underage (e.g., the bio indicates that the account in fact belongs to a parent or guardian). Bio information is viewed as more reliable and is therefore evaluated first. An account that contains information that explicitly states or contextually implies that the user is under 13 will be checkpointed and the user will be required to provide Meta with proof of age.⁹ Because there are not comparable "account bios" on Facebook, Facebook account review will evaluate the date of birth on the account and then go directly to Step 2.
- **Step 2: Account Photos.** If the account bio does not contain sufficient written information to determine age, the reviewer will evaluate the photos contained in the account. Reviewers are trained to look for physical characteristics indicating that the account holder is underage. If a human reviewer finds sufficient signals that the user may be under 13, the user will immediately be placed in an age checkpoint. To err on the side of caution, reviewers who are unsure of whether a user is under 13 based on a review of the account media are instructed to default to a finding that the user is underage.¹⁰

When a user's account is checkpointed, it is suspended and the user is prevented from accessing the account, and the user's profile is not visible to other users.¹¹ The checkpointed user has the opportunity to appeal and recover access to their account if they can demonstrate they are old enough to use Facebook or Instagram in the United States by providing adequate documentation that they are at least 13 years old. Where a user does not provide adequate documentation within a specified period of time that they are at least 13 years old, their account (and all other accounts in the same Accounts Center) and the data associated with the account

⁹ There are certain limited exceptions, for example, where an account includes a bio indicating that the account represents a user under the age of 5 (as these accounts are not reasonably understood to be operated by people this young) or where accounts are operated by a parent and represent a child under 13, so long as the bio clearly states that the account belongs to the parent.

¹⁰ To ensure safety of children and teens, in addition to reviewing these accounts for evidence that the user is too young to use Instagram, reviewers are separately trained to look for any evidence of child exploitation, sexualization, or nudity. These accounts will be separately escalated and, when appropriate, reported to law enforcement.

¹¹ Prior to May 2020 on Facebook and August 2022 on Instagram, when a user was in an age checkpoint, their profile was still visible to other users, though the user could not access their account unless and until they provided documentary proof that they were over the age of 13.

is scheduled to be deleted. Meta has taken steps to ensure that accounts flagged as potentially underage are reviewed as quickly as possible after they are reported. While manual review is a labor- and time-intensive process, the team responsible for this process works to make a determination on accounts that are flagged as potentially underage within 48 hours of receiving the report.

WhatsApp

WhatsApp does not collect age information or calculate, Estimate, or infer the age of users on WhatsApp. However, WhatsApp's Terms of Service require users to be at least 13 years of age in the United States and Meta has developed a process through which parents or guardians can report an account potentially belonging to their underage child. As explained in WhatsApp's Help Center, parents or guardians who would like to report a potentially underage child should email Meta.¹² Once Meta can reasonably verify that the account belongs to a child under the age of 13, it will promptly disable the account.

¹² See About minimum age to use WhatsApp, available at https://faq.whatsapp.com/818604431925950/?locale=en_US.