

Exhibit 122

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October 3, 2022

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

VIA EMAIL

Elizabeth Nach, Esq.
Keith Fentonmiller, Esq.
Brittany Frassetto, Esq.
Michelle Rosenthal, Esq.
Brian Shull, Esq.
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: FTC File No. 2223006: Civil Investigative Demand issued to Meta
Platforms, Inc. on March 14, 2022

Dear All:

On behalf of Meta Platforms, Inc. ("Meta"), enclosed please find Meta's responses to Interrogatory Specification Nos. 32, 39, 42 (for Facebook, Instagram, and WhatsApp), 43 (for Facebook, Instagram, and WhatsApp), and 47 of the Commission's March 14, 2022 Civil Investigative Demand ("CID"). Consistent with our discussions, Meta is responding to the CID on a rolling basis. Meta's investigation into and efforts to respond to the CID are ongoing. Should additional or revised data or information become available, Meta reserves the right to supplement or amend its responses as needed.

* * * *

This letter and accompanying responses and exhibits contain Meta's confidential and sensitive business information ("Confidential Material"). We respectfully request that you accord confidential treatment to the information enclosed herewith pursuant to 5 U.S.C. § 552(b)(4), 15 U.S.C. § 46(f), and 15 U.S.C. § 57b-2. So that Meta may effectuate these rights, we request that: if any person not a member of the

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.