

AMENDED Exhibit 1006

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

Produced in Native

CONFIDENTIAL

GOOG-3047MDL-05442974

EXHIBIT

12

Kids Research Insights



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Insights

- 1 **"Mindless" has emerged as the enemy, not technology** – The one thing everyone agrees on is exploration + creation = good.
- 2 **YouTube faces gaps across the hierarchy of parents needs** – Our brand is polarizing with parents - despite being 3rd most liked, it is also the most disliked
- 3 **Kids care about content and characters, not platforms** – Kids ask for "Dora" not for "Netflix"
- 4 **Educational content is key** – 44% of media used by 2-10 year olds is considered education by parents
- 5 **Parents are unaware of YouTube's family content** – We're still a search engine for funny animals
- 6 **Design for kids first, parents second** – Parents expect kids to watch videos independently by age 5

Insights

- 7 Kid-tuitive improvement #1: Personalization** – needed to make the app appealing in the short term and engaging in the long term
- 8 Kid-tuitive improvement #2: Search** – Searching (voice and text) is still challenging and error-prone
- 9 Games are important as both content and competition** – We’re competing against games for kids’ limited screentime.
- 10 Parents want more control** – “I’m a little cynical about the whole process [of flagging]”
- 11 Earshot monitoring is the norm** – Parents want to stay engaged with kids’ interests without constant monitoring
- 12 Big screens are better** – “TV is still THE ‘device’ most often used by kids [5-7 years old]”

Educational content is key

44% of media used by 2-20 year olds is considered educational by parents

Among 2-10 year olds, avg time spent with educational media, by platform			
	Total media time	Educational media time	Proportion of media time that is educational
Television/DVDs	1:21	:42	52%
Video games	:17	:03	18%
Computer	:14	:05	36%
Mobile device	:14	:05	36%
Total screen media	2:07	:56	44%

"I'd like to ensure that learning quotient is high and it's not just mindless videos."

Implications for YouTube:

Highlight educational content on YouTube for parents and keep this expectation in mind when programming content and enabling content discovery in the product (i.e. the "Learning" category)

Google | YouTube

Google Confidential and Proprietary

Quote:

<https://docs.google.com/>

Parents are unaware of YouTube's family content

We're still a search engine for funny animals

- Parents see YouTube as an extension of Google search
- Until age 6, children largely mimic parents' online habits and learn to use YouTube as a place to find things online
- Music videos and animal videos are the most frequently mentioned type of YouTube video for kids 2-7 years old

To me YouTube is a search engine...

- [REDACTED], father of 3 kids aged 3-10 [REDACTED]

He usually either goes on just to find out about something or watch music videos.

- [REDACTED] father of 2 kids aged 4-6 [REDACTED]

When she goes on YouTube it's video after video of the same thing. She'll get into... a certain song or type of video and just watch everything on it.

- [REDACTED], mother of 3 year old girl [REDACTED]

Implications for YouTube:

Co-marketing will help anchor the YouTube Kids brand and drive awareness of our offering.

YouTube Kids app gives easier access to kids' content and improves content discoverability with better browsing.

Draft Top 12

Foundations of our current work

1. **(B) Kids are content and character-centric.** They turn to Netflix because they are looking for Dora, not because they want to check out Netflix. Kids, like adults, are less interested in unfamiliar videos, pointing to the need for high quality, character-centric thumbnails.
2. **(B) "Mindless" is emerging as the enemy, not technology.** The one thing everyone can agree on is **exploration + creation = good.**
3. **(B) YouTube is divisive brand among parents.** It is seen as a place to find **inspirational content related to the child's passions.** Netflix and Kids TV Network sites/apps are more positively reviewed than YouTube in terms of appropriateness for the child and educational content. **YouTube is more likely to be described as 'dangerous' than 'trustworthy.'**
4. **(B) Many parents are not aware of YouTube's great family friendly content. They still see it as a search engine for music videos, funny cat videos and clips. When they encounter a YT creator for the first time, they need an introduction.** Parents don't believe YouTube helps them discover new shows for their kids to the extent that competitors do. "Like regular YouTube, many channels are unfamiliar. Getting to know a new video series is currently a time-intensive video watching process."
5. **(B) Educational content is key, especially for young kids** – Nearly half (44%) of the screen media 2- to 10-year-olds use is considered educational by their parents. Lower-income parents (<\$25K a year) are more likely than other parents to turn to TV for educational purposes. It's important to have a balance in our content btwn entertainment, education, showing diff. perspectives, etc.."Lock it in learning" requests.
6. **(L) Design for kids first, parents second.** We've found that young kids are often the ones holding the tablet.
7. **(L) Earshot monitoring** - Dashboards on kid behavior are new to parents. Parents were enthusiastic about the feature and expected the dashboard to compliment existing 'earshot monitoring'. Parents current behavior is in person

Draft top 24

The Future

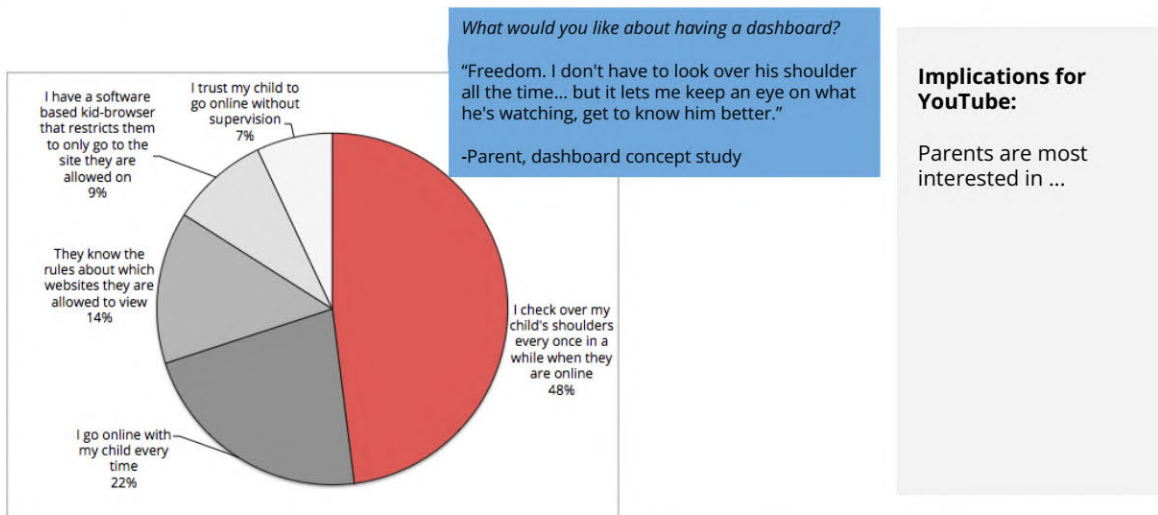
1. (both) Big screens are better - better posture, better monitoring and more togetherness. Parents hang on to more traditional forms of media because **'new age' devices hinder feelings of togetherness and creativity**; Tablet and TV streaming are the preferred methods for viewing online videos for family entertainment [Big screens = better]; **The majority of screen time is on TV (~1 hour a day) but it's changing** – Mobile screen time is up while TV is down.
 - o **"The TV is still THE 'device' most often used by kids [5-7 years old]... It's their #1 favorite thing to do – and by far the #1 most frequent electronic thing they do."** -[KidSay Trend Tracker report, pg.8](#)
 - o Product implication - focus on TV as next big platform / Chromecast
 - o Marketing implication - lean into ways that small screen can create moments of togetherness
- (L) Kid-tuitive improvement #1: **Age and interest based personalization** is needed to make the app appealing in the short term and engaging in the long term (reduce scrolling, better browsing) ([Kid Experts Report](#) | [Watch Video Highlights](#))

"The difference between a 2 and 5 year old is like the difference between a 12 and 40 year old in development years" ([more here](#))
- (L) Kid-tuitive improvement #2: Searching (voice or typing) is challenging for kids and usability improvements such as visual search, search facets and conversational voice search could make this much easier.
- (both) Parents have low expectations around flagging. Encountering an inappropriate video is a pivotal moment to win user trust in YouTube's ability to do the right thing. Flagging discoverability is low and parents have low expectations once a video is flagged. However, we are prepared to place search ads for the Pegasus Help Center and we will exceed their expectations for human review at launch. Email support is preferred by parents.
- (both) Games are important as both content and competition

Pegasus is testing well. Most kids are engaged and parents want to know when the app will be available for download.

Earshot monitoring is the norm

Dashboards on kid behavior are new to parents



Google | YouTube

Source: LMX Family 2014

Q: Do you supervise your child's use of online content, and if so, how? Among parents of kids 6-12 Google Confidential and Proprietary

48% of parents of 6-12 yr olds check of their child's shoulder every once in a while when they are online, LMX Family 2014

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