AMENDED Exhibit 1011

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

One-Pager: Playability Fallback for PDS Failures

UPDATE (7/12): after discussing with the team, we think this is not worth pursuing further. The proposed fallback is probably too conservative and too much effort for very little benefit to users.

No reviewers/approvers yet. Add them using '#reviewer' (for optional) / '#approver' (for required) in your action items along with +xyz@google.com, and we will auto-populate review/approval status here.

Using [HYPERLINK "[redacted] [HYPERLINK "[redacted]

Status: Draft
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Team: YT Identity + Privacy
Tracking Buganizer ticket/hotlist: [HYPERLINK[redacted] \h]
Drafted: Jul 6, 2023
Last Significant Update: Jul 10, 2023

Background

This doc is a companion to the [HYPERLINK "https://docs.google.com[redacted] \h] for [HYPERLINK [redacted] \h] and is meant to address the followup AI in [HYPERLINK "[redacted].

[redacted]

The original issue was fixed within a few weeks by [redacted], where it was previously missing. However, the issue raised some questions around the failure modes in our playability policy.

Current State

Today, the playability library pulls the [redacted] ([HYPERLINK "h[redacted]h], [HYPERLINK "[redacted]" \h]). The [redacted] derives its [HYPERLINK [redacted]] from a variety of [redacted] ([HYPERLINK [redacted]]).

[redacted] ([HYPERLINK [redacted]]), which does not cause any max safe content label to be applied ([HYPERLINK "h[redacted]\h]). In turn, this means [redacted]

Proposal

For the safety of underage users and paying customers, perhaps if Playability is unable to confidently assert that the user has explicitly chosen an unrestricted setting, [redacted] by default.

One way to do this would be add a check for [redacted] [HYPERLINK [redacted] \h] like:

[redacted]

. . .

[redacted]

Commented [1]: [redacted] why would this happen?
a) The client has not set MRM
b) The client has MRM on but the signal is unavailable
c) We don't know
If "b", do we know the reason? and do we have a sense of scale?
Thanks!
Assigned to [redacted]

[redacted]

Commented [3]: Did some digging today, [redacted]

Is there a way to just test this? I believe we could just set up a test to inject a fault into [redacted] and see the result.

Commented [4]: That fallback is only done for [redacted]

Commented [5]: It could also be that it is [redacted] that is the case, what would be the process for the user to bypass the restrictive content level?

Commented [6]: Is there a test we can carryout to understand how often the [redacted] on or off?

Commented [7]: Right, if we do this, there could be [redacted]

[redacted] ([HYPERLINK [redacted]

[redacted]

Rollout and Monitoring

[redacted]

Alternative Considered

To be even more conservative with MRM enforcement, we could make this change further upstream [redacted] Rather than having the Playability library perform this check, we could have [redacted]. This would have the same downstream playability effect.

This option is not preferred because [redacted], so this change could have unintended effects in other places.

Open Questions

1. What is the right content level to enforce here? Intuitively, it makes sense to me that if we cannot confirm MRM settings, [redacted]
   a. [HYPERLINK "mailto[redacted]\h] is looking into this for us.

Commented [8]: 1 total reaction
[redacted] reacted with + at 2023-07-07 14:44 PM

Commented [9]: How about just say this concretely:
[redacted]
It's worth highlighting the comment thread from above: This seems very comparable to SupeX, where consumer Family Link accounts that could be SupeX [redacted]

Commented [10]: Agreed, added inline

Commented [11]: Do we expect all of these to be the result of bugs, like more places where we fail to register new users?

Commented [12]: My intuition says yes since I don't know of any other reason they would be missing, but I don't have the data to back that up. This would help with that, ideally.

Commented [13]: 1 total reaction
[redacted] reacted with + at 2023-07-10 13:43 PM

Commented [14]: I think it depends? If user is signed out, we never make the PDS request [redacted]) and hence never [redacted] and we [redacted] At that point, it depends what's in the request header [redacted]

Commented [15]: Agree that looks to be what the safety mode module does. [redacted] Based on this, ...

Commented [16]: yeah I think we would return a [redacted], at least a ...

Commented [17]: What about elsewhere in Playability, [redacted]?

Commented [18]: [redacted] ...

Commented [19]: Ok, noted inline. Thanks for digging into it.

b. Update: actually, it looks like when the user is signed out, [redacted] ([HYPERLINK [redacted].

2. Is this worth our time to fix? I estimate this will take about two SWE-weeks to implement and test, then another SWE-month to roll out safely. MRM tends to be trivially easy for students to bypass if they clear cookies, sign out, open an incognito tab, or switch devices, so generally it's not a high priority to make these blocks completely foolproof. The primary motivation for this fix would be to mitigate major outages or avoid potential complaints from Workspace admins.
   a. [redacted] -[HYPERLINK [redacted] \h]- [redacted]
   b. Update: see #1 above
   c. Update: Note that actually [redacted] ([HYPERLINK [redacted]
3. In case [redacted] ?
   a. As currently described above, no it should not. [redacted].

Commented [20]: This is a fair question. Would falling back to signed out parity make this project easier here? Otherwise, maybe we might consider putting this project on the backlog.
1 total reaction
[redacted] reacted with +at 2023-07-10 13:43 PM

Commented [21]: imho this isn't worth 2 SWE months of work. If Workspace cares deeply about perfect MRM coverage, then they should pass [redacted]

Commented [22]: [redacted] As far as [redacted] was able to see, the current signed out content policy is simply to block mature content, which may be sufficient for now.

Yeah as I've looked more at this, agree this project probably is pretty low priority.

Commented [23]: This only works on Chrome, and only where 3p cookies are enabled, right?

Commented [24]: [redacted]

Commented [25]: Workspace should already be setting the expectation that MRM doesn't work in all cases (you call out multiple unsolvable edge cases above). Imo this seems like a negligible risk [redacted]

Commented [26]: [redacted] This seems perhaps not ideal? In my view, certainly no reason to have a hard dependency on [redacted].

Commented [27]: Oh sorry this was not clear. You're right, it's actually currently ONLY a hard requirement for Dashers: [redacted]