

AMENDED Exhibit 1016

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

Privileged

Parent Screen Time Monitoring and Controls in YT

Authors: [REDACTED]

Updated: 3/8/2022

Created: 3/8/2022

[V3]

TL;DR:

1. **Problem: Parents don't have an easy way to monitor and control their children's screen time on YT.**
 - a. Parents state that screen time is the #1 issue they care about. [D5]
 - b. Screen Time controls in Family Link and YT (user focused) are inadequate:
 - i. Family Link Screen Time controls only apply to Android and Chromebook devices. ~65% of users in the US are on iOS. There is a large segment of user that can't use Family Link screen time controls.
 - ii. Family Link controls are difficult to access from YT. There is no direct entry point to Family Link controls from YT.
 - iii. YT provides user screen time controls and management, but a parent cannot access these controls on their device.
2. **Competition:** [Instagram](#) and TikTok are emphasizing parental controls, particularly focused on Screen Time.
3. **Regulation**
4. **Proposal: Provide YT Screen Time Monitoring and Controls within YT Parent Controls.**
 1. Enable Parents to see their child's YT screen time usage, covering all surfaces and apps (YT Kids, SupeX, Living Room, etc.).
 2. Enable Parents to set limits on their child's YT screen time.

Problems:

1. Parents care about their children's screen time and digital well being (DWB) and don't have an easy way to manage it on YT. [V13]
 - [90% of parents](#) agree that they want their kids to spend a majority of their time away from their screens.
2. Google and YT's current offerings are inadequate.
 - a. Family Link Screen Time controls:
 - i. Only available at the YT Android App level. Does not measure screen time on non-android devices / cross platform. [D14]
 - ii. Not accessible via YT. Requires parents to go to Family Link to see screen time.
 - b. YT User Screen Time controls: [A16]

Page 1 Comments

- N1** Great idea. Specially if brings feature parity with other apps. [REDACTED]
[REDACTED], 3/9/2022 06:13 AM
- N2** I had a brief chat with James. Perhaps, we can all do a small group brainstorm on couple of ideas and then pick one. James had couple of other ideas like onboarding less.
[REDACTED], 3/9/2022 04:43 PM
- V3** sg!
-- Onboarding, making it easier to get started will be a separate work stream. Perhaps we can do both in parallel.
-- I'll share a doc on making easier to get started on YT and communicating with Parents.
[REDACTED], 3/9/2022 05:27 PM
- V4** confirm exact stat.
[REDACTED], 3/9/2022 03:12 AM
- D5** safety and privacy are more important, but those are table stakes that launched with and are an evergreen commitment. We have a couple pieces of research that speak to their strong interest managing screen time. Maybe phrase as:
- Screen time concerns are a global truth, and parents need digital rules to support the boundaries they set IRL. 75%+ of parents agree that they want their kids to spend a majority of free time away from screens, and 60%+ set rules on their screen time (n=15k, global). Our wellbeing controls today anchor on defaults and self-regulation by tweens -- who developmentally struggle to self-regulate -- without any parent mediation.
- Then get into the fact that TT and IG offer (or will offer) more wellbeing controls for parents of 13+ than we offer for <13. And what Family Link offers for Android excludes the bigger opportunity to also build for iOS users too (US: ~72% of 13-24 YT DAU)
[REDACTED], 3/9/2022 07:14 PM
- V6** [REDACTED] -- I think you have a lot of data on this right? Surveys / market data that says parents are the most concerned about screen time?
[REDACTED], 3/9/2022 02:59 AM
- D7** Yes:
EN speaking quant (non-EN coming back soon): [https://docs.google.com/\[REDACTED\]](https://docs.google.com/[REDACTED])
[REDACTED]
[REDACTED]
- Parent
segmentation: [https://docs.google.com/\[REDACTED\]](https://docs.google.com/[REDACTED])
[REDACTED]
- Naming qual: [https://docs.google.com/\[REDACTED\]](https://docs.google.com/[REDACTED])
[REDACTED]
[REDACTED], 3/9/2022 07:16 PM
- L8** A few thoughts here on why this is not a black or white problem:
1) Screen time is hard to control at the app level, easier to control at the device level (iOS, Android).
2) Not all screen time is created equal. eg. parents don't have a problem with their kids

Page 1 Comments (Continued)

- L8+** design controls for that granularity?
4) More than daily screen time, parents are also concerned about late night use. So bedtime reminders are equally effective.
[REDACTED], 3/23/2022 06:01 PM
- L9** [REDACTED]
[REDACTED], 3/23/2022 06:01 PM
- V10** good points. i think i'm missing context on this. maybe we discuss in person.

i think there is good prior art: both what YT does for user screen time and competitors. We can be better.

1. What's hard to do at the app level? We do it already per user on YT. I have a YT take a break reminder setup, and it goes off regardless where I'm consuming YT, including LR.

2. Not all screen time is equal. Agreed. I think we can design around this? one way would be to provide finer control. screen time for VODs, but not music. Obviously tricky, but i think solvable?

3. Weekends vs. weekdays. yeah great point. Similar to the point above i think. Not all time is the same. We have nothing today, this feels like an addition.

4. yeah, even more than parent monitoring, tell parents - hey your child watched YT at 3 am is helpful. vs. number of hrs.
[REDACTED], 3/23/2022 08:35 PM
- V11** Perhaps a bigger question is do we feel like some form of screen time monitoring and controls for parents is important?
- Both from a parent / teen, and KOF need.
- I obviously think yes on both.
[REDACTED], 3/24/2022 02:38 AM
- L12** Yes, but you're gonna find those product debates the things I've pointed out. So options tables again to ensure everyone can weigh in on these. :) We went thru these debate with the Main app team years ago.
[REDACTED], 3/24/2022 03:57 PM
- V13** yeah, I think the question is if we should do this?
[REDACTED], 3/24/2022 04:10 PM
- D14** [REDACTED] YT is the top app with a per app screen time limit set by FL parents: [REDACTED]
[REDACTED], 3/15/2022 10:10 PM
- D15** 15% of new FL parents enable a kid bedtime: [REDACTED]

20%+ of active supervised accounts have an active bedtime set up via FL: [REDACTED]
[REDACTED], 3/15/2022 10:13 PM
- A16** maybe with focusing on increasing penetration here first vs building this out in YT as well
[REDACTED], 4/17/2022 07:44 PM

- i. Parents cannot access their child's screen time controls.
- 3. Regulators and KOFs are focusing on screen time and DWB.
- 4. YT's competitors (TikTok and Instagram) are offering a more robust set of parental controls than YT, including screen time monitoring and limitations.

Proposal:

- 1. In YT Parent Settings (families.youtube.com), enable parents to see their child's (Unicorn and YT Kids Profile) YT usage, across any surface or YT apps (YT Kids, SupeX, Living Room, etc.)
- 2. Allow parents to set daily limits^[P21] for their children.

Phasing:

- 1. Make YT User screen time monitoring available to Parents. SupeX only initially.
- 2. Integrate YT Kids screen time into YT Parent Screen time controls.
- 3. Allow parents to enable take a break reminders for their kids.

Considerations:

1. Functionality:

- a. Will YT Apps be included? YT Main, YT Kids, YT Music, YT TV, Living Room? Google Assistant Devices?
 - We should follow the same principle as YT User screen time monitoring, which is per user across these surfaces.
 - For screen time monitoring, YT Main app is included, across all surfaces. YT TV and YT Music are not included.
- b. Will this feature reduce overall YT watch time?
 - Maybe, but this functionality already exists for individual users. We are just exposing it to parents.
 - Overall, this feature is good for parents and children.
- c. Is there a privacy risk of exposing a child's screen time to their parents? Particularly for existing SupeX users, where YT screen time monitoring didn't exist?

2. Family Link:

- a. How will YT screen time controls work with Family Link screen time controls?^[V22]

Page 2 Comments

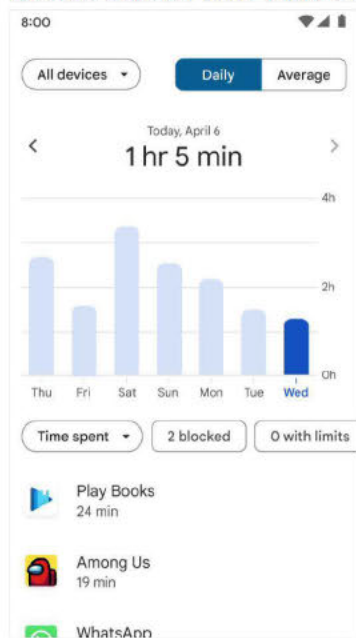
- W17** Ideas to consider
- Time ranges when a kid can watch (e.g. can't watch past bedtime)
 - Different time limits for different days of the week
 - Enable/disable "take a break" reminders
- ██████████, 3/9/2022 07:18 AM
- V18** love it!
- YT screen time for users today only has take a break reminders.
- ██████████, 3/9/2022 07:27 AM
- C19** ██████████ In general this proposal is great to see. One helpful background point - how are we differentiating this from the controls within FL? - e.g. value prop of this vs. FL
- Caitlin Niedermeyer, 3/9/2022 04:39 PM
- V20** yeah - I have s section below on this.
1. FL Screen time controls only works on the YT Android app, not on overall YT usage.
 2. This would be accessible from YT directly, via parent settings.
- ██████████, 3/9/2022 05:15 PM
- D21** we're an app/web product that's basically ubiquitous. unlike FL we have an obligation to begin thinking about iOS families if we're going to responsibly grow and appeal more broadly in developed markets with greater iOS DAU (~60% 13-17 US YT DAU in the US are iOS). ██████████ you should look into how Gellers with FL set on by their parents, and time limits on too, interact with their personal break/bedtime/time spent insights on YT.
- ██████████, 3/16/2022 04:11 PM
- V22** This will be a key issue to determine.
- ██████████, 3/9/2022 06:59 AM

- This is only an issue if we have screen time limits, not monitoring. Having two locations which report YT screen time is ok. One challenge will be that the screen times will be different (Family Link measures android only, while YT measures cross device).
- We have multiple options for dealing with screen time limits.
- If we do nothing, we will likely have overlapping screen time controls. The Family Link controls will monitor screen time for the YT app on android. The YT screen time controls will monitor screen time overall. This isn't an entirely terrible UX, as the two screen time controls are meant to do different things.
- We could prioritize the YT screen time over Family link screetime, only for Android devices.

From Family Link team ^{A25}

Current state today:

Family Link has screen time monitoring & controls for YouTube apps across supervised platforms - Android, Android TV, Chrome OS, and (less relevant) Wear. This is controlled alongside all other installed apps for each child. Controls that exist include allow/block, app time limits, and always allow (which allows the app to be used after device screen time runs out)



Any YT apps used by child appears in this list

Note that there is an interesting phenomenon where YouTube is both the app that most kids have a time limit on, and most kids have always allowed even after time limit runs out - so parents find YouTube to be very important to both set limits, and recognize the inherent positive value of allowing their child to use more of.

Page 3 Comments

W23 [REDACTED] PTAL
[REDACTED], 3/23/2022 04:35 PM

V24 LOVE it!

[REDACTED] -- FYI. screen time controls usage today in FL.
[REDACTED], 3/24/2022 02:58 AM

A25 +1 thanks for the stats, super helpful!
[REDACTED] 3/24/2022 02:57 PM

Top Apps with Limits

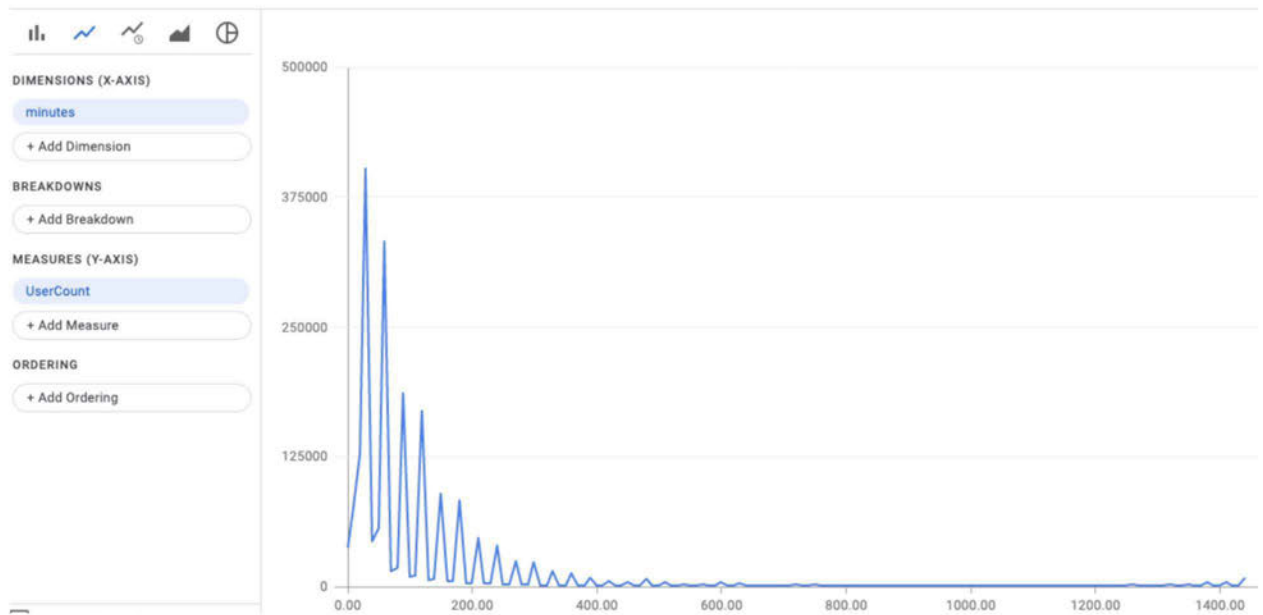


App Package Name	# of 7DA Supervised Accounts w/ Limit ▼
com.google.android.youtube	1987968
com.zhiliaoapp.musically	1122056
com.android.chrome	863710
com.roblox.client	806190
com.supercell.brawlstars	687429
com.google.android.apps.youtube.kids	609036
com.whatsapp	599934
com.instagram.android	598229
com.innersloth.spacemafia	560356
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com.supercell.clashroyale	276701
com.netflix.mediaclient	256651

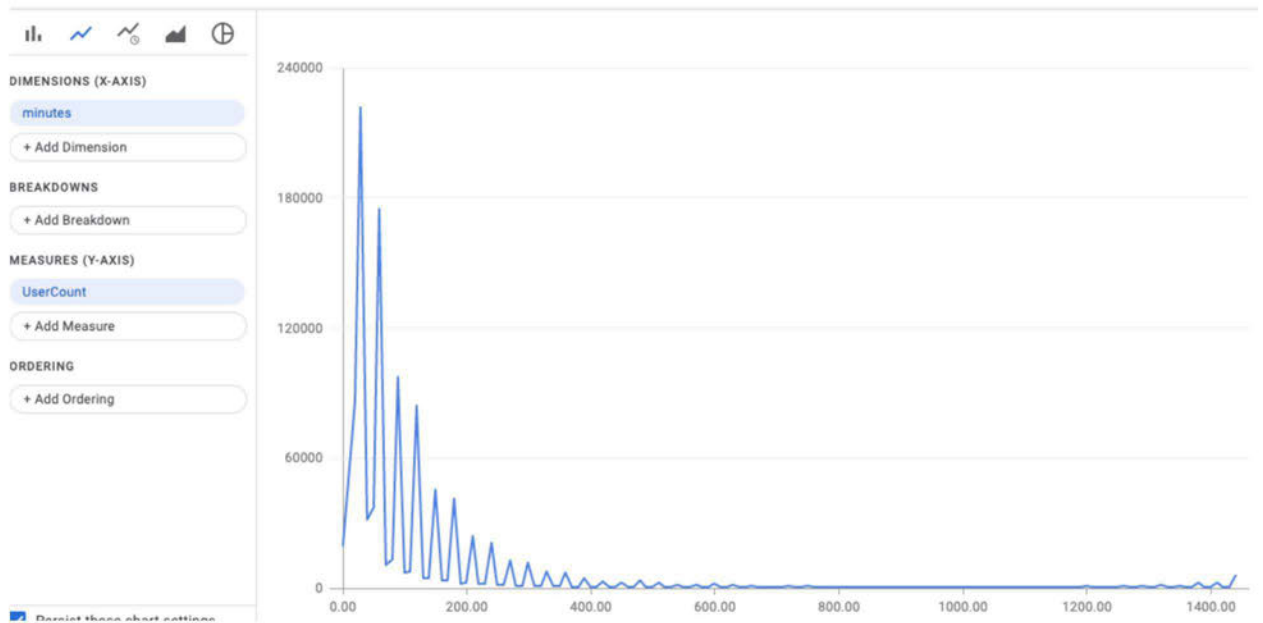
YouTube & TikTok app time limits set by parents, in minutes by quartile:
Median time limit set is 60 min for both YT and TikTok

☐ app	UserCount	minutes_percentiles
1 com.zhiliaoapp.musically	1085186	[0, 30, 60, 120, 1435]
2 com.google.android.youtube	1928894	[0, 30, 60, 120, 1435]
3 com.netflix.mediaclient	254392	[0, 55, 90, 180, 1435]

Distribution of time limits set by parents, for YT app, in minutes



Distribution of time limits set by parents, for TikTok app, in minutes



Always Allowed Apps Top Chart 7D

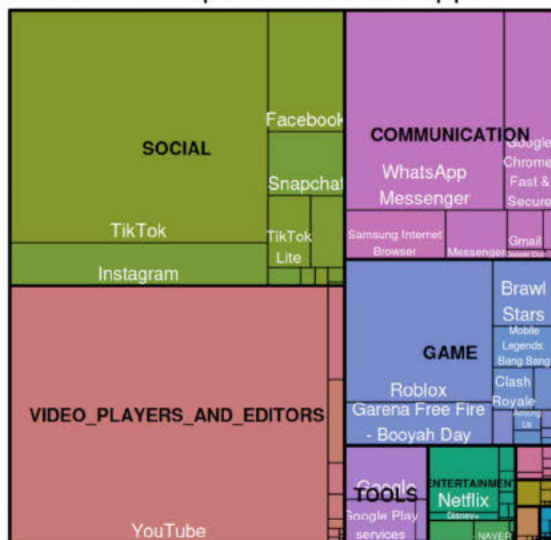


Always Allowed App	UserCount ▼
com.whatsapp	825790
com.google.android.youtube	656819
com.android.chrome	465587
com.google.android.gm	436296
com.google.android.apps.maps	368392
com.sec.android.app.camera	363756
com.google.android.apps.photos	327789
com.google.android.apps.messaging	287581
com.spotify.music	285580
com.sec.android.gallery3d	283786
com.samsung.android.messaging	266865

Problem: YT alone accounts for 29% of Unicorn Android app time, and should have special case x-platform screen time controls given it's elevated presence & impact in child life, and parent's top feature request

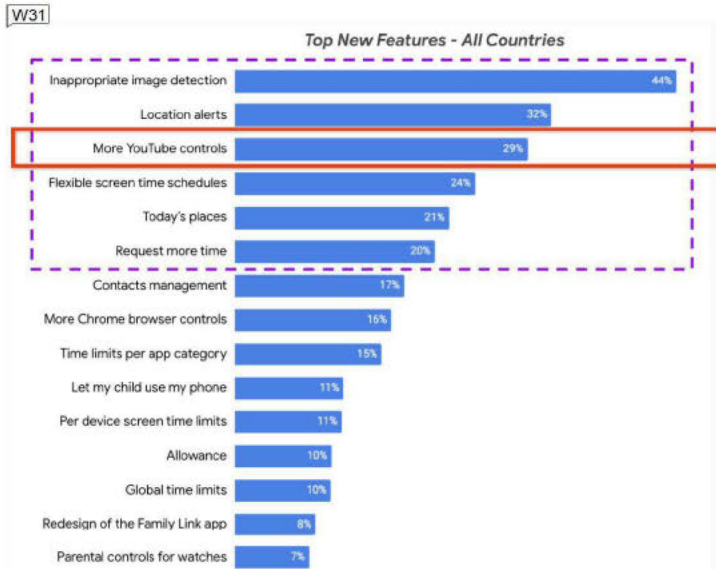
[V29]

Unicorn time spent in Android apps



Page 6 Comments

- A26** [REDACTED] so #2 app by time spent is TT ? but parents dont set a time limit?
did i get that right?
[REDACTED], 3/24/2022 02:57 PM
- W27** TT's package name is actually "Musically" (I think this might be the original TT name?)-
which is the second ranking app that parents set limits on, see above chart. Notably,
YT appears on top "Always allowed apps" but TT does not
[REDACTED], 3/25/2022 06:30 PM
- A28** ah doh me. btw do we have time as well or just DAU?
[REDACTED], 3/29/2022 02:08 AM
- W29** I added some more charts above. tl;dr - median limit set for both apps is 60 min.
distribution of time limits set for both is pretty similar
[REDACTED], 3/29/2022 11:07 PM



Proposal approach:

YT / Parent Tools is the hub for screen time monitoring & controls for YouTube x-platform, per roadmap described in the rest of this PRD

Family Link to surface insightful snippet about YT screen time tile at the top level dashboard:

- The coexistence of YT screen time adjacent to app & device screen time helps distinguish between the two screen times for parents, aiding in comprehension
- Tapping YT screen time tile opens YT parent tools. The top level visibility directs parents to Parent Tools for the YT roadmap of screen time monitoring & controls

Page 7 Comments

V30 [REDACTED] -- where is this from? super interesting.

[REDACTED], 3/24/2022 02:56 AM

W31 We run an annual comprehensive NPS for Family Link, and asked for top requests, see: <https://docs.google.com> [REDACTED]

[REDACTED]

[REDACTED]

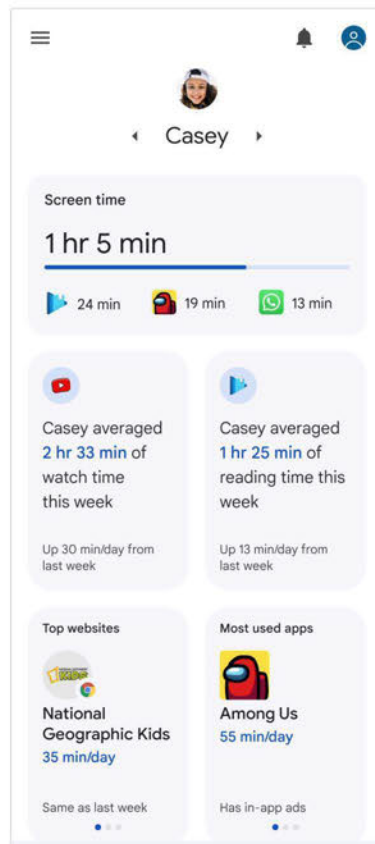
[REDACTED], 3/25/2022 06:32 PM

V32 [REDACTED] -- this would be a proposal right?

[REDACTED], 3/24/2022 02:57 AM

W33 Yeah, proposing that after the top level dashboard position, parent is taken to Parent Tools for the comprehensive monitoring & controls that you're defining

[REDACTED], 3/25/2022 06:33 PM



[Early concept mock. What exactly goes in the tile TBD]

Family Link to provide entry point for parents to YT screen time from YouTube pps listed in App Screen Time

- Continues to educate parents on the mental model between app & device screen time vs YouTube x-platform screen time

3. YT Kids:

- Will Parental YT screen time monitoring and controls apply to the YT Kids app?
- How will it work with the YT Kids timer (timer details [here](#))?

4. YT Sceen time controls:

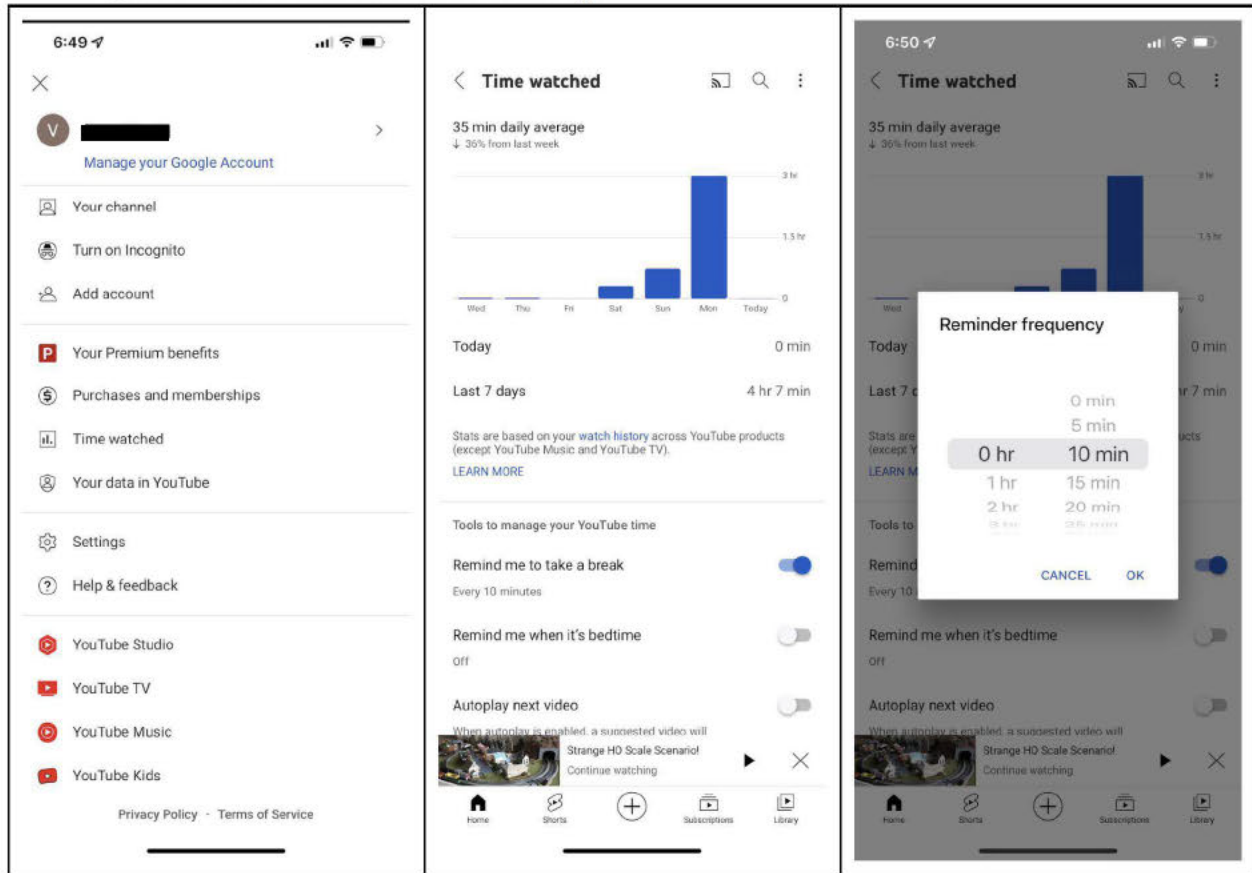
- How often are YT user screen time controls and monitoring used today?
- Today, YT only offers Take a Break reminders for users, will the Parental Control go further?
- How will the Parental screen time control work with the YT user screen time controls?

5. Unsupervised Teens

- DWB is a key concern for parents of teens, screen time controls will help with that.

YT User Screen Time Controls:

- Screen time controls in [YT Blog Post](#).
- Screentime Dashboard is mobile only.^[N35]



Family Link Screen Time Controls:

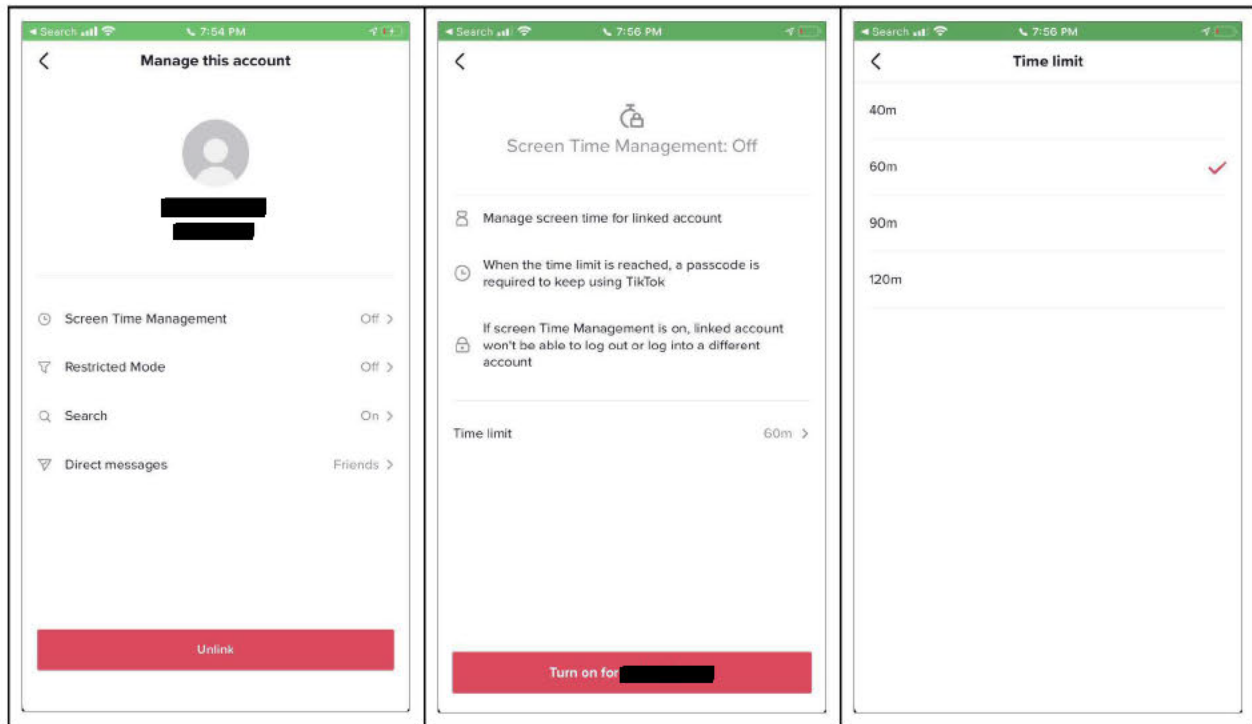
- [Help center](#) explaining Family screen time controls on Android and Chrome.^[V38]

Competitors:

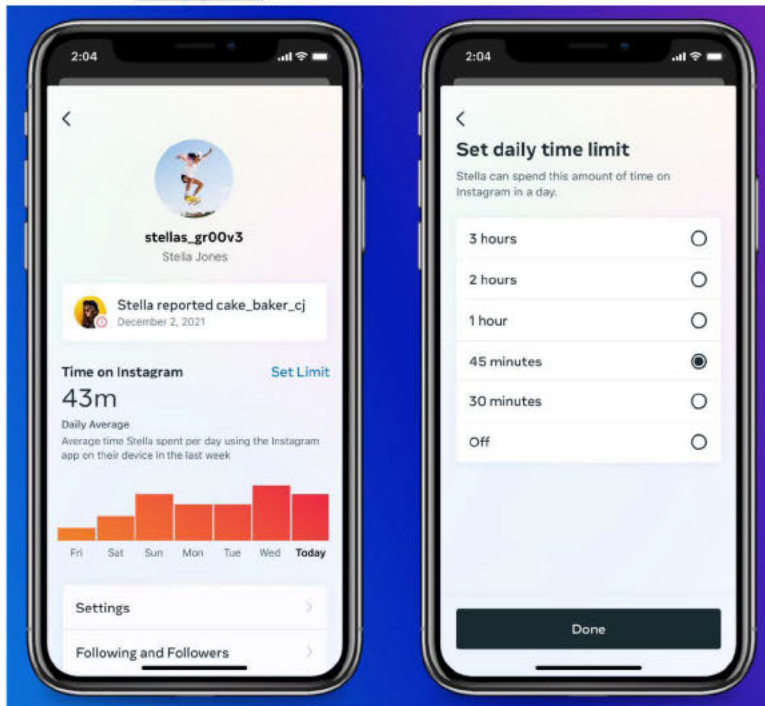
- [TikTok](#): Parents can set limits for their child via Family Pairing.

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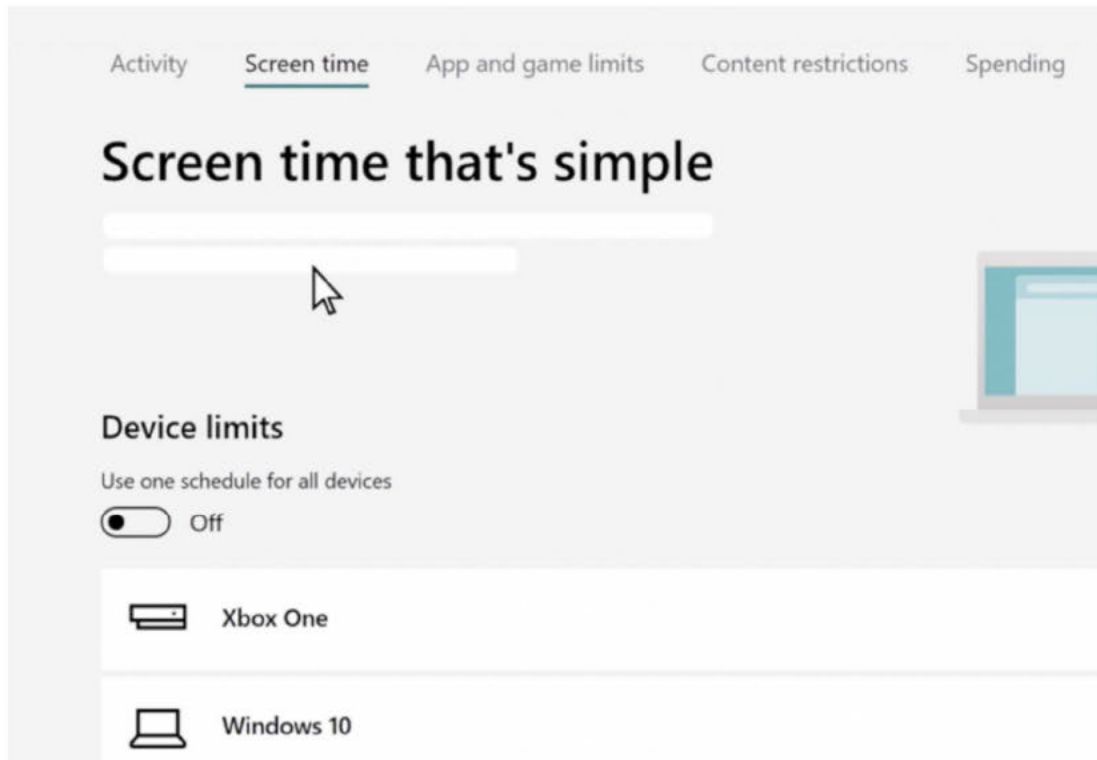
- V34 [REDACTED] -- any chance you can point me to some basic usage stats?
[REDACTED], 3/10/2022 02:18 AM
- N35 Yes - they're here under StatRowRenderer: go/wellbeingdash
[REDACTED], 3/10/2022 05:06 AM
- V36 [REDACTED] -- discussed competitors screen time controls.
[REDACTED], 3/9/2022 03:09 AM
- V37 [REDACTED] -- do you still have access to your kids gaming app parental controls? Is screen time apart of it?
[REDACTED], 3/9/2022 03:10 AM
- V38 Oh yes, screentime in Xbox Family App
: [REDACTED]
[REDACTED] 4/27/2022 10:08 PM



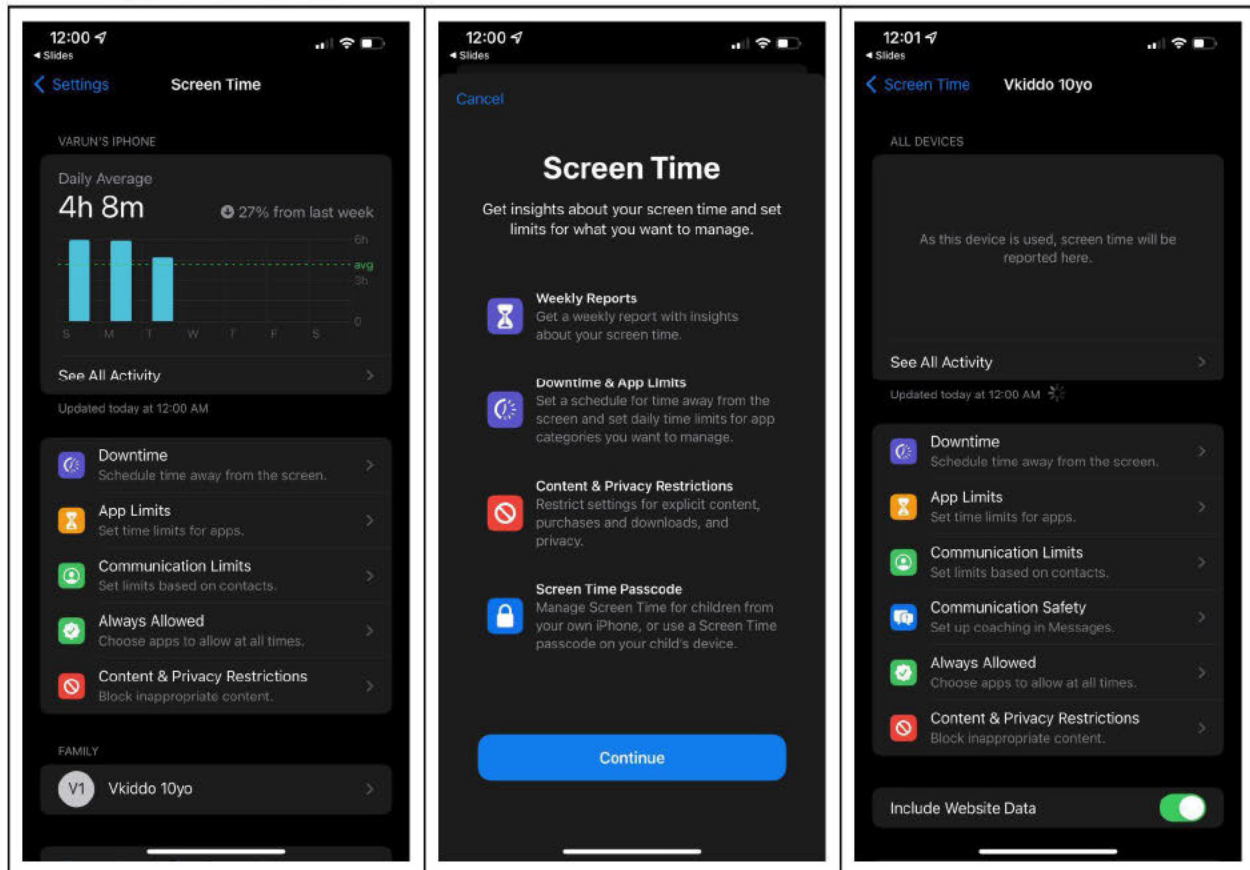
- **Instagram:** Parents can see their child's usage, and set limits (announced, coming in Q1 2022, [blog post](#)).



- **Microsoft** parent screen time controls:



- **Apple Screen Time Controls:**



User Screen time controls.		Child Screen time view / controls.
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Regulation:

1. [Blumenthal & Blackburn Introduce Comprehensive Kids' Online Safety Legislation](#)

“Requires that social media platforms provide minors with options to protect their information, **disable addictive product features**, and opt out of algorithmic recommendations. Platforms would be required to enable the strongest settings by default.

Gives parents new controls to help support their children and identify harmful behaviors, and provides parents and children with a dedicated channel to report harms to kids to the platform. “

2. AADC?^{V42}

Page 12 Comments

- V39 [REDACTED] **REDACTED - PRIV**
[REDACTED] **REDACTED - PRIV**
[REDACTED] 3/9/2022 02:44 AM
- J40 [REDACTED] to advise
[REDACTED], 3/9/2022 03:28 AM
- C41 [REDACTED] is the goal here to capture all regs (draft + law) that touch on a specific theme? If so, what are you most interested in? Happy to build this out further to the extent helpful
Caitlin Niedermeyer, 3/9/2022 04:38 PM
- V42 definitely not all. Was hoping to get the highlights, particularly where this feature will be relevant:
-- Addressing regulation directly.
-- How it might help with a narrative.

Can chat f2f to avoid sensitivity.
[REDACTED] 3/9/2022 05:11 PM

DOCUMENT SLIPSHEET

Bates Number: GOOG-3047MDL-05214601-GOOG-3047MDL-05214620

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ENDATTACH:

PRODVOL: PROD027

Custodian: WATSON, REID

File Path: /YT PARENT SCREEN TIME MONITORING AND CONTROLS.DOCX

Confidentiality Designation: CONFIDENTIAL

HASHVALUE: C95640DF43F4C7A81BDEAC053095C8C6

Document Type: PDF

Author: [REDACTED]

Family Date: 4/27/2022 10:08 PM

Last Modified Date: 4/27/2022 10:08 PM

TRACK CHANGES: NO

COMMENTS:

HASHIDDENATA: NO

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