AMENDED Exhibit 1034

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

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Memo: Teen Wellbeing Features for Overuse [go/yt-teen-wellbeing-features-memo]

Team: YT Youth **POC:** [redacted]@, [redacted]@ **Contributors:** [redacted]@, [redacted]@, [HYPERLINK "mailto:[redacted]" \h][HYPERLINK "mailto:[redacted] \h][HYPERLINK "mailto:[redacted]" \h] [HYPERLINK "mailto:[redacted]" \h] [HYPERLINK "mailto:[redacted]" \h] [HYPERLINK "mailto:[redacted] \h]
Date: 5/2/2023
Links: Eng design docs, PRDs, etc.

Goal for memo & discussion

- Align on 2023 plan for Teen Wellbeing Front End Features

Decision Needed

Are we aligned with the recommendation to improve existing reminders, launch feed breaks (starting with zen), and potentially explore an early version of intervention or nudges?

James	Approved
[redacted]	Approved
[redacted]	Approved

[TOC \h \u \z \n \t "Heading 1,1,Heading 2,2,Heading 3,3,Heading 4,4,Heading 5,5,Heading 6,6,"]

Context/Background

Commented [1]: I think it would be good to collate all the existing OS-level infra available for DWB; and then mention what will be built above and beyond that?

Making YouTube Fun, Useful, and Responsible for Teens is a priority for YouTube and the Youth team in 2023. A key pillar in this strategic goal is an emphasis on **Teen Wellbeing.**

For Teen Wellbeing, the team is focused on 3 areas, informed by research with parents and teens, as well as feedback from our Owls panel:

- **Problematic Content:** Non-violative, non-borderline content that in repetition or high volume impact teen wellbeing. (Our main approach here will be to expand the rollout of

VIBE, which uses dispersion to reduce the concentration of sensitive content for teens.)

- **Risky Participation:** Potential exposure to risk when participating or creating in the YT Community. (Here, our early efforts will be a combination of 'teaching moments' when creating or commenting, as well as stricter default settings for comment safety for U18 users.)
- **Overuse (focus of this memo):** Experts have identified DWB problems in the areas of [HYPERLINK "https://docs.google.com[redacted] \h]. We will focus on Teen Wellbeing front-end features to help mitigate these.

Additional Context: Social Media Impact to Teens a Social Issue

Across the board, the social media impact on teens has become a [HYPERLINK "https://docs.google.com/[redacted] \h], drawing attention from users, schools, the media, politicians, and even advertisers. Newly introduced bills at the state and federal level (some already passed) propose feature limitation and parental consent/oversight for U18 users.

Possibly due to this increased attention, other social media companies have been investing in digital wellbeing features for the teen audience (see more in [HYPERLINK \l [redacted]]). While YouTube has historically launched features like TAB and Bedtime reminders to support digital wellbeing in 2019, we have not had recent visible launches, relative to our peers (see next section).

It's important to ensure we can focus on responsibility as we grow our teen audience, and have a compelling narrative in this area.

Existing Features

"Take A Break" reminders (Habitual Heavy Use)

- Users can set a reminder to take a break after *n* minutes of watching videos. The frequency is set to 75 minutes by default across VOD and Shorts.
- TAB reminders are turned on by default for u18 users.
- There are different visual treatments for TAB reminders based on where the user is when the reminder gets triggered:

Commented [2]: all at the device level?

Commented [3]: did we work with the main app team who launched the DWB suite to make sure this is comprehensive?

Commented [4]: Do we know why 75 min was chosen for these? If we do plan to update existing offerings it would be good to clarify why our thinking here has changed.

Commented [5]: To clarify - I agree we should update since this seems misaligned with cYTT, expert guidance, and competitor offerings!

Commented [6]: I'd assume (but we should confirm) this was based on VOD usage, not Shorts. And since Teens lean more heavily towards Shorts, we should consider revisiting

Commented [7]: I assume we could experiment with this value.

Commented [8]: Yes, at that time in 2019, Avg session length was just over 60mins I believe. So 75 mins was chosen as like top 10 percentile of heavy use.

Commented [9]: yes, we are looking into reducing the default reminders

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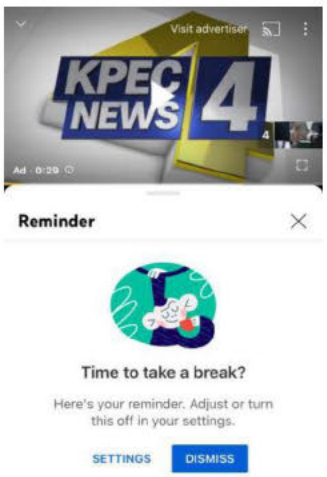
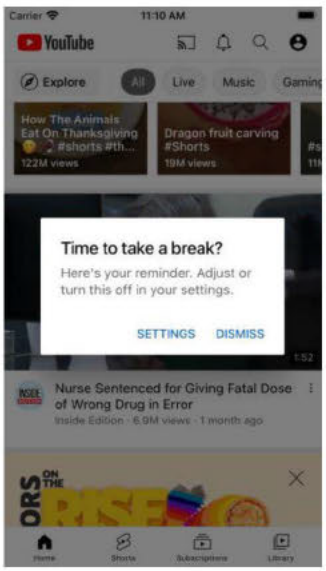


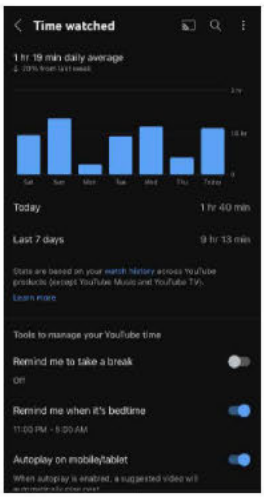
TAB reminder in VOD



TAB reminder everywhere else (incl Shorts)

"Time Watched" profile (Habitual Heavy Use)

- The time watched profile lets users check their daily average watch time. It also shows how long you've watched YouTube videos today, yesterday and over the past 7 days.
- Time Watched is found when the user accesses the Account menu.
- In addition to viewing the daily average and breakdown over the past 7 days, users can access TAB and Bedtime reminder settings.



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Bedtime reminders (Late Night Usage)

- Users can set specific times when they want to get a reminder to stop watching videos and go to bed. They can have the reminder interrupt the video or wait until the video ends.
- Like TAB reminders, Bedtime reminders are on by default for U18 users.

Notification Quiet Hours & Scheduled Digest (Late Night Usage)

- This feature ensures that notifications from the YouTube app are sent silently to a user's phone during a specified time period each day. By default, all sounds and vibrations from the YouTube app are disabled between 10 pm and 8 am, but users can customize the start and end times.
- The scheduled digest combines all daily push notifications normally received throughout the day from the YouTube app and sends just one daily digest notification instead. Users can set a specific time to receive their scheduled digest.

The existing features are summarized in the table below:

	DWB Goal		
Feature	**Habitual Heavy Use**	**Late Night Use**	**Unintentional Use**
TAB Reminders	x		
Time Watched	x		
Bedtime Reminders		x	
Quiet Hours		x	
Digest		x	

Competitor Offerings

"Take A Break" reminders (Habitual Heavy Use)

- **TikTok:** Users can set a reminder to take a break after *n* minutes of watching videos on Tiktok. For u18, the frequency is set to 60 minutes and a Passcode is needed to continue watching after every 60-minute limit.
- **Instagram:** TAB reminders occur when a user consumes content via newsfeed, reels, and stories.
- TikTok and Instagram's TAB moments have a more engaging visual design, and for TT the Dismiss action involves greater friction. Additionally, TikTok has leaned in with Teen-appealing creators to create TAB moments.

Commented [10]: Could we tie this into the OS-level DWB reminders, such as what Android has?

Commented [11]: I didn't see a way to do this on Android, but it seems like a critical feature. Does it only exist on iOS?

Commented [12]: This option should be available on both iOS & Android when setting up bedtime reminders (I have it on android): https://support.google.com/youtube/answer/9884905?hl=en&co=GENIE.Platform%3DAndroid&oco=0

Commented [13]: This table clearly shows that Unintentional Use is the opportunity space. In the past, features here that we have explored are:
_ Focus mode
_ Collapsed Recs (launched on learning)
_ Topic pivots in shorts
_ Raising good digital wellbeing content (audio)

Commented [14]: Yup, agreed

Commented [15]: Agree

Commented [16]: maybe call it 'intentional usage'

Commented [17]: We are planning to work on a 'raise' content strategy to complement the VIBE work fyi.

Commented [18]: same question about device level vs. user level

Commented [19]: Is this enabled by default for u18 audience? By passcode you mean re-auth?

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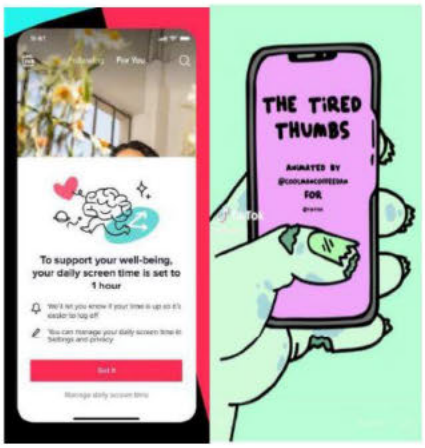
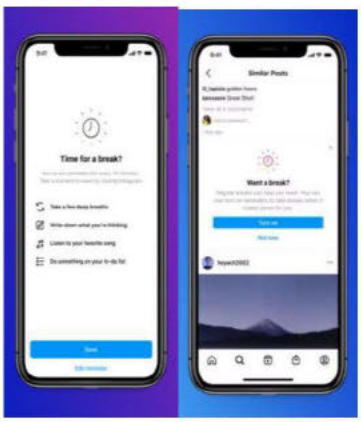


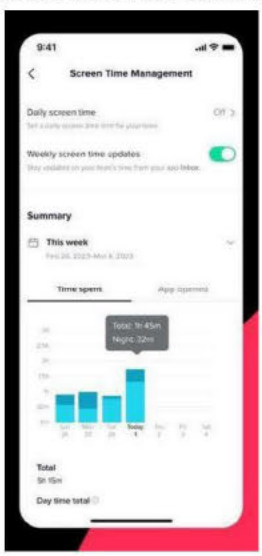
TAB reminder on Tiktok

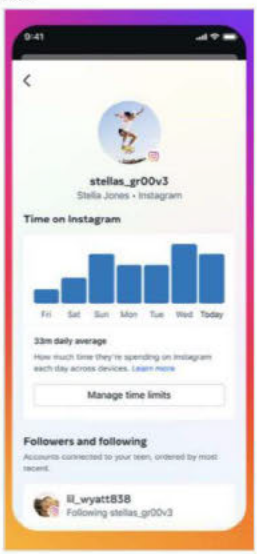


TAB reminder on Instagram

"Time Watched" profile (Habitual Heavy Use & Late Night Usage)

- **TikTok:** Users are able to review their daily watchtime broken out in daytime vs. nighttime hours.
- **Instagram:** Similar to YouTube, on IG users are able to see their daily consumption and adjust settings for break reminders, daily limits, and notifications. Additionally, users are able to see their "activity" from "your activity" option on the app to track the various posts they interacted with and liked/commented on etc.





Nudges (Unintentional Use)

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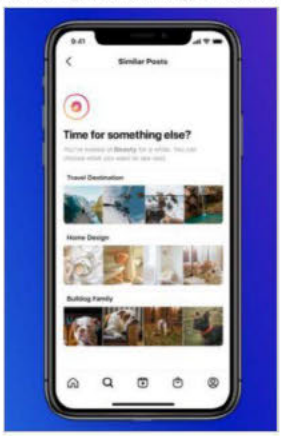
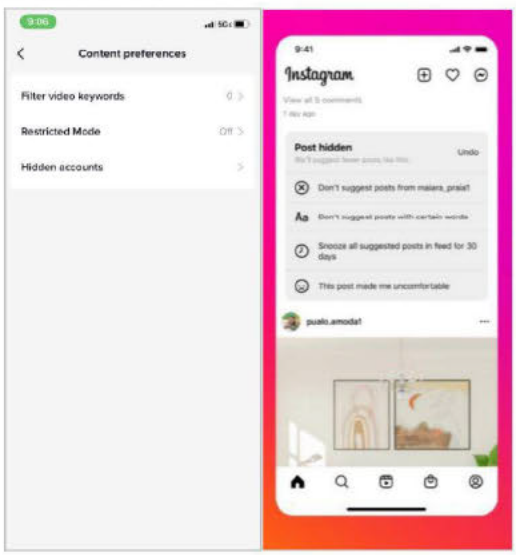
- **Instagram:** When users have spent a large amount of time repeatedly viewing the same genre of content in their newsfeed or on Reels, [HYPERLINK "https://about.instagram.com/blog/announcements/raising-the-standard-for-protecting-teens-and-supporting-parents-online" \h] via 'nudges' – giving users the option of breaking out of the cycle and trying something different.



Content Filters (Unintentional Use)

- **TikTok:** Users can set Content Preference filters to filter out video keywords and turn on/off a 'restricted mode', which [HYPERLINK "https://support.tiktok.com/en/safety-hc/account-and-user-safety/user-safety" \h].
- **Instagram:** Users are able to filter out content from their friends and recommendations through "hide" option via the three dotted menu. On Instagram, users are able to filter out keywords and content recommendations.



Quiet Mode

Commented [20]: this one seems interesting

Commented [21]: +1 We should be doing this.

Commented [22]: Agreed. In research teens mention wanting help finding content that matters for them

Commented [23]: how is "large amount" defined? number of minutes in one session? across sessions?

Commented [24]: do we know what granularity is used for "same genre of content"? e.g. "fashion" vs. "make up videos" vs. "social comparison of physical features"?

- TikTok doesn't support quiet mode.
- Instagram supports quiet mode where a user can save the quiet setting when they prefer not to get notifications. Within the quiet hours that were set by the user, Instagram holds back on notifications, displays a user's profile in quiet mode, and auto-replies to messages. At the end of the set timeframe, a summary of what the user missed will be presented to the user.

These competitor features, compared with YouTube's, are summarized in the table below:

	DWB Goal		
App	**Habitual Heavy Use**	**Late Night Use**	**Unintentional Use**
TikTok	TAB reminders Creator breaks	Time Watched Profile (w/nighttime usage)	
Instagram	TAB reminders Time Watched	Bedtime Reminders Quiet Hours Digest	Nudges
YouTube	TAB reminders Time Watched	Bedtime Reminders Quiet Hours Digest	

Commented [25]: 1/ Why is there a need for shorts teen related breaks?

Proposed Strategy & Roadmap

Principles

Since Teens have greater independence and growing agency (and Parents have less of the direct oversight that they would have for younger children), our goal for Teen Wellbeing Features is to help Teens **self-monitor and self-regulate** their YouTube usage. Initially, our 2023 focus will be on consumption, but we also plan to begin looking into potential wellbeing issues related to creation and participation.

To help teens self-monitor and self-regulate, we are following these principles:

- **Awareness:** Teens need help to recognize when their short term behavior is negatively impacting their long term wellbeing.
- **Agency:** We empower Teens to make changes to improve wellbeing

2023 Focus

To help land our Teen Wellbeing GTM moment planned in Q4, we need to ship some quick features with urgency. To achieve this, we propose keeping Milestone 1 focused on updating our "break moments" to reach better parity with our peers in this space.

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The following table lists various ideas that were considered for Milestone 1:

Feature Idea	DWB Goal	XFN/ Partner Lift	GTM Value (for late Q3 moment)
Shorts Feed Breaks - Zen videos	Habitual Heavy Use: Showcase calming visuals to decompress from short-form video consumption.		
Shorts Feed Breaks - Creator Videos	Habitual Heavy Use: Showcase public figures / influencers relevant to Teens to encourage wellbeing breaks.		
Redesign Take A Break and Bedtime Reminders & Reduce default TAB frequency	Habitual Heavy Use: Redesign existing break notifications to help more effectively encourage teens to take a break.		
Wind down mode - Reduce blue light	Late Night Usage: Reduce blue light leading up to default bedtime.		
Wind down mode- Sleepy Time Recs	Late Night Usage: Offering sleep content options such as soundscapes, sleep podcasts to Teens so that Teens can wind down faster and fall asleep with high quality sleep.		
Nudges to healthier feed	Unintentional Use: Raise awareness of mindless scrolling and consumption of similar content via a nudge towards healthier content.		

Commented [26]: i think we likely have a debate on what dimensions are important for us in considering our options and making trade offs. also think we may have a shorts vs. vod debate on where to focus

Commented [27]: also what we are optimizing for - speed vs impact?

Commented [28]: ETA is now early Q4

co[redacted]

Commented [31]: Green if we're considering quick wins, but maybe a yellowish-green bc there's only so many times you can show a zen video and expect a pause (vs. having a full set of breaks that encourage different types of pauses)

Commented [32]: +1 though I expect user value would be yellowish-green and feed breaks would be green for GTM value (since they are visible, could resonate well with KOFs/parents, etc)

Commented [33]: *Yellowish-green for user value until we know more about how users would engage with these

Commented [34]: Clarified that this is about GTM value (PR/KOF) for the late Q3 moment

Commented [29]: [redacted].com curious as to your thoughts on this

Commented [30]: Would teens get more annoyed by these what they might consider "interruptions"?

Commented [35]: another wind-down mode idea is collapsed recs. We did it for learning courses.[redacted]

Commented [38]: In isolation, I'd mark this red ..

To make this green, you probably need it to be a part of a defacto Bedtime Mode (ie. at 10pm, a bunch of things happen for inferred teens - including reduced blue light)

Commented [39]: +1

Commented [40]: That was the intention - any wind down mode should be leading up to a bedtime moment

Commented [41]: Assuming that's the case, would you agree this should be green then?

Commented [42]: The sum of the parts, ie. a robust Quiet Mode (Reminder + Blue Light + Sleep Recs + Notifs off) is green, agreed

Commented [36]: I've seen mention of both blue light reduction (e.g. shifting to a redder/yellower hue) and reducing overall color saturation. Do we have an idea of which approach is better? I believe desaturation/grayscale is about reducing the impact o

Commented [37]: I don't know that I have a strong opinion - I do think that either is a clear visual signal t

Commented [43]: Might be a green bc we'd be able to show that we're tapping into and using YT's strengths

Commented [44]: Yes, as per above - intention is any wind down mode is tied to a bedtime moment

Commented [45]: lets debate this

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Current Milestone 1 Proposal (for discussion):

Priority	Awareness	Agency	DWB Goal
P0	• Refreshed [HYPERLINK \l [redacted]	• [HYPERLINK \l [redacted]	Habitual Heavy Use
P0	• [HYPERLINK \l [redacted]]	• (P2/early 2024) Shorts pivot interventions / Nudges to Healthier Feed	Unintentional Use
P1 (Stretch)	• [HYPERLINK \l [redacted]] (either Reduce Blue Light or Sleepy Time recs)	• Add a "Wind down" setting	Late Night Use

Commented [46]: Zen moments as discussed in comments above would not rate high on behavior awareness, are they are nor related nor inform on specific behavior. Maybe that is something we could enhance in a later version of the feature?

Future Initiatives

Shorts Pivot Interventions/Nudges: To help provide Teens with agency in taking action when they are in a repetitive Shorts watch cycle (possibly on VIBE content), we would like to explore adding "nudge" prompts to encourage users to try something new – ideally "healthy content recommendations" such that users feel that this is time well spent on YouTube. This will require additional diligence on existing features and tools, as well as UX design/research. We will begin this work now, with a goal of launching something in Q1 2024.

Mitigating Creator Burnout: Later in 2024, we would like to launch front-end interventions if teen creator burnout is becoming a concern. Historically, users have identified two key issues: 1/Pressure to stay relevant and post content on YouTube consistently 2/Pressure to engage with viewers constantly. In the short-medium term, we will monitor whether this is becoming a need, while also brainstorming what front-end interventions we could offer to mitigate.

2023 Proposed Roadmap - Deep Dive

Conceptual Mock	Description

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[redacted]	**Zen Moment:** Rest for 15 seconds from scrolling and take a break after watching *n* shorts. (Frequency TBD based on Owls feedback and experiment) Goals: ● Primary: Provide a temporary pause / calming moment before continuing Shorts feed ● Secondary: An interruption may help Teens recognize it's time to stop their watch session and do other things Zen "commercial" moments have gotten [HYPERLINK \l [redacted] Additional, creator-generated, breaks (leveraging same infrastructure) to follow. Same goal of breaking unintentional overuse flow.
[redacted]	**Redesigned Take a Break:** Redesigned UI when TAB moment occurs - ideally this is something more engaging for teens and more intentional to dismiss, that more actively encourages them to take a break.

Commented [47]: [redacted]

Could these breaks have a deeplink to settings tab encouraging teens to set break reminders (ie. in the description)?

Is that already part of the plan? Would be helpful driver of "% of Teens engaging with digital wellbeing tools"

Commented [48]: Agreed, in addition, could they include some insights about amount of use before getting them? It would also be a driver of increased awareness

Commented [49]: Yes +1, left a similar comment above

I think besides redesign of TAB we should be driving awareness in-product

I love the idea of including insights as well. "You've been watching for X min! Now take a 15 sec break."

Commented [50]: A few things --

Zen moments are not TAB moments. Two different things. Zen moments are periodic interruptions in the Shorts experience, TAB moments are periodic reminders at the entire YT app level to take a break.

Intention isn't to have a setting for Zen moments. (In the same way we don't have a setting for MFK activity breaks). So there's no point in offering a deeplink to settings from the zen moment itself.

Also, Teens will continue to have TAB/bedtime reminders on by default, so we don't need to encourage them to turn those on.

What we could do is include high level insights on overuse in Shorts at the Zen moment, but we should experiment with that.

Commented [51]: I guess the question I have is what is success (in terms of user behavior) for TAB vs. Feed/Zen breaks? And perhaps more specifically, what's the best way to define the success of feed/zen breaks...

Is the current thinking: ...

Commented [52]: Agreed we need to think of success. Specifically as we want to drive awareness and agency, we will need to evaluate those two concepts

Commented [53]: [redacted] added this (would be good to position that zen is our low hanging fruit, but that it is actually part of a more robust set of potential interventions)

Important to preempt questions like "won't zen be ...

Commented [54]: To that point, Dolly - how many Zen moment assets are there? Would we be able to introduce some variety if we had 15-20 different assets to rotate between?

Commented [55]: I believe 10 to 15. I can confirm/clarify.

[redacted]

Commented [56]: Could we include a link to insights to increased awareness and allow them to make informed decisions?

Commented [57]: Suggest keeping it simple for MVP but we can always experiment with different treatments over time

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[redacted]

Commented [58]: lets debate

Directional Mocks - [HYPERLINK

[redacted]

DOCUMENT SLIPSHEET

Bates Number: GOOG-3047MDL-03499498-GOOG-3047MDL-03499513

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