

AMENDED Exhibit 296

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

Digital Me

*Exploring Tweens'
Social Media Habits*



trends

Youth UX Research

- **Summary**

- **Research Methods**

- **Tweens' Digital Habits**

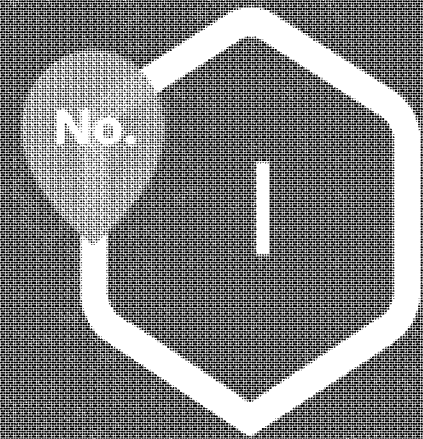
- **Tweens and Social Media Access**

- **Tweens and Social Media Apps**

- **Tweens and Social Media Needs**

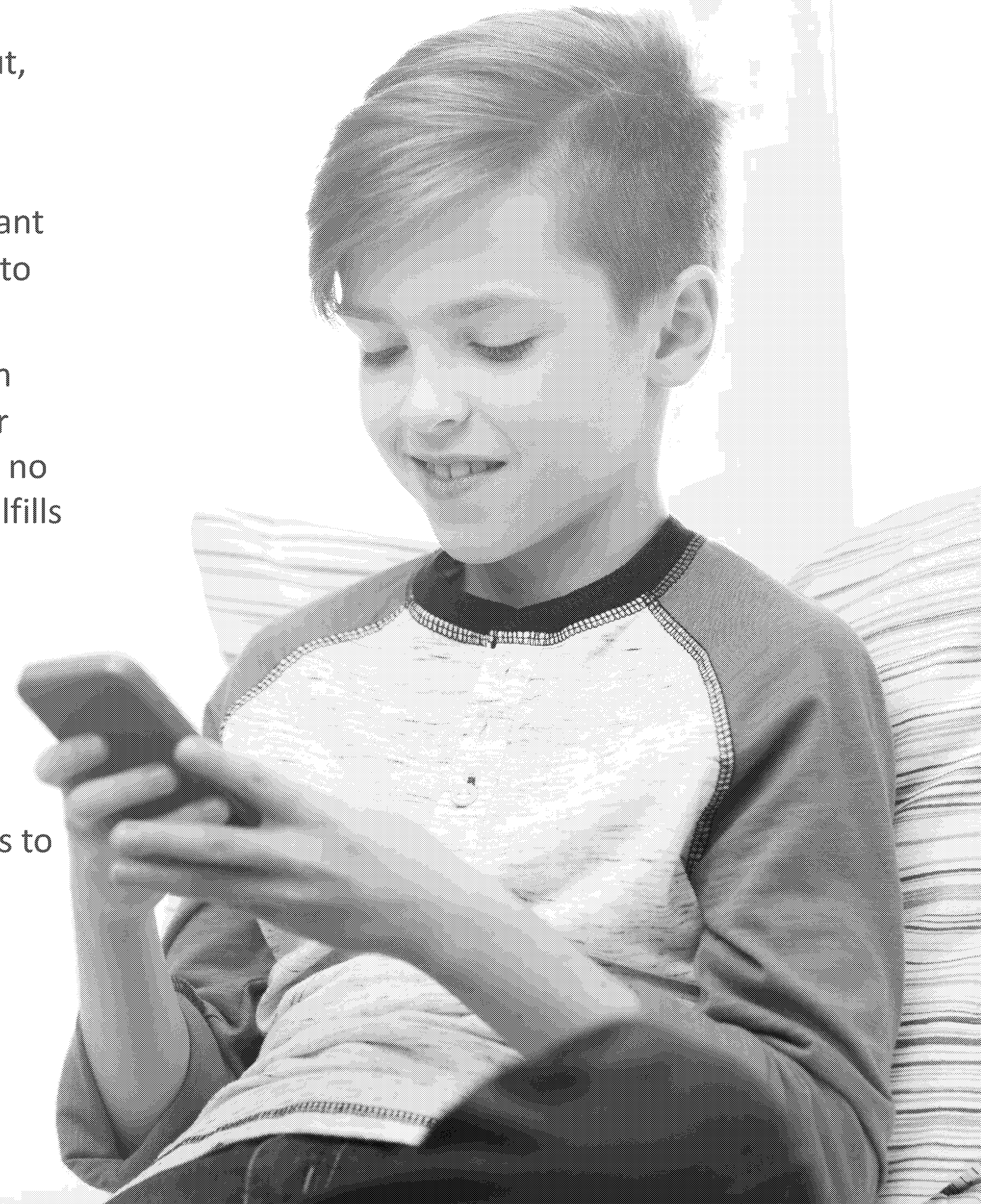
- **What's Next**

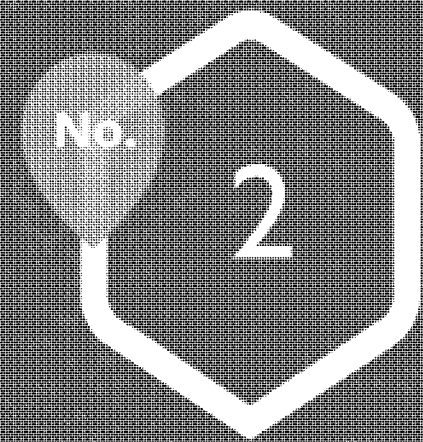




Summary

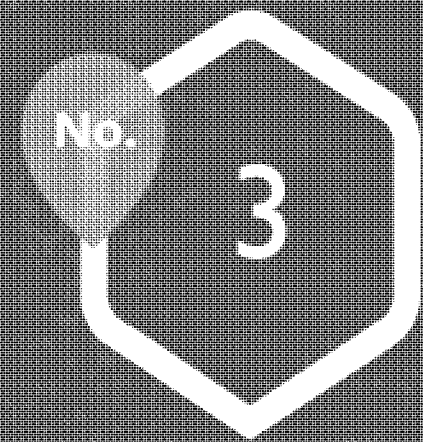
- Tweens' primary devices are phones.
- Tweens' digital habits are still influenced by parents. But, parents are no longer as important as peers for taste-making.
- Tweens' digital habits are driven by a desire to be entertained and have fun with their friends. They also want to connect to others digitally, not to display their 'identity', but to learn HOW to fit in.
- Tweens are already on social media. They decide on which app is for them based on the app's user base. The real driver for tween engagement on social media is entertainment. Currently no social media app truly feels like it was made for them or fully fulfills their needs.
- There is an opportunity for a tween centric social (media) experience. It needs to
 - Use entertainment as a starting point for engagement
 - De-emphasize identity projects or communication
 - Blend offline/online experiences: Use digital to get tweens to do something IRL
 - Strengthen connections (not communication!) to a small circle of friends
 - Make sharing with others fun
 - Highlight social/communal experiences





Research Methods

- Qualitative research (by vendor SmartyPants)
 - 6 in-home interviews (Jonesborough, TN and Charlotte, NC) in August 2017
 - 2 10 year-olds, 2 11 year-olds, 2 12 year-olds
 - With their own smartphone and own social media account
- Quantitative research
 - Survey to n=275 11-12 year-olds (US) in April 2017
 - Survey to n=125 7-9 and n=125 10-12 year-olds in September 2016
 - Survey to n=1,050 10-12 year-olds and parents in March 2017 (by Instagram)
- This series of qualitative and quantitative research was checked against previously conducted FB internal and external tweens research. While results are directionally conclusive, %s should be taken with caution.
- The research summary presented in this report was also informed by additional tweens research from the past two years. Due to the sensitive nature of the subject, research findings, materials and raw data about tweens' social media usage are only available upon request.



Tweens' Digital Habits

Digital leisure becomes the norm.

- Tweens now mostly have their own devices.
- Phones are the norm, enabling them to access apps on the go.
- Their friends are increasingly on social media/using digital communication.
- They know what they are interested in and seek out interests online.

They have a lot of activities and feel stressed, leading them to want to relax online with “lean back” activities.

Their digital usage becomes more social and outward-oriented. The top 3 activities tweens do on their phones are accessing social media, playing games, and messaging.



Tweens start to have their own phones by the end of elementary school.

In elementary school, tablets are an obvious choice

- Kids in 3rd and 4th grades (ages 8 to 10) typically use these devices for **gaming**.
- They also use tablets for **watching videos** and **video chatting** and/or **communicating** with **family**.
- Some come to realize they can **interact with peers** through messaging apps.
- Almost everything **happens at home**, on WiFi.

"11 is the golden age for phones."
— 11yo boy

"I like playing Piano Tiles and Angry Birds on my phone."
— 10yo boy

In 5th grade, many tweens receive their first phones

- For the first time, they have something digital **all to themselves** – and can take it wherever they like.
- **Gaming** is still a big part of the mix, but **social media** becomes a part of their digital diets.
- And they're **connected wherever** they go.

Digital communication with parents becomes more utilitarian.

Initially, the phone serves as the conduit between tweens and their parents – for utilitarian messaging.

With newfound freedom (middle school), 11-year-olds must let their parents know – typically through phone calls or texting:

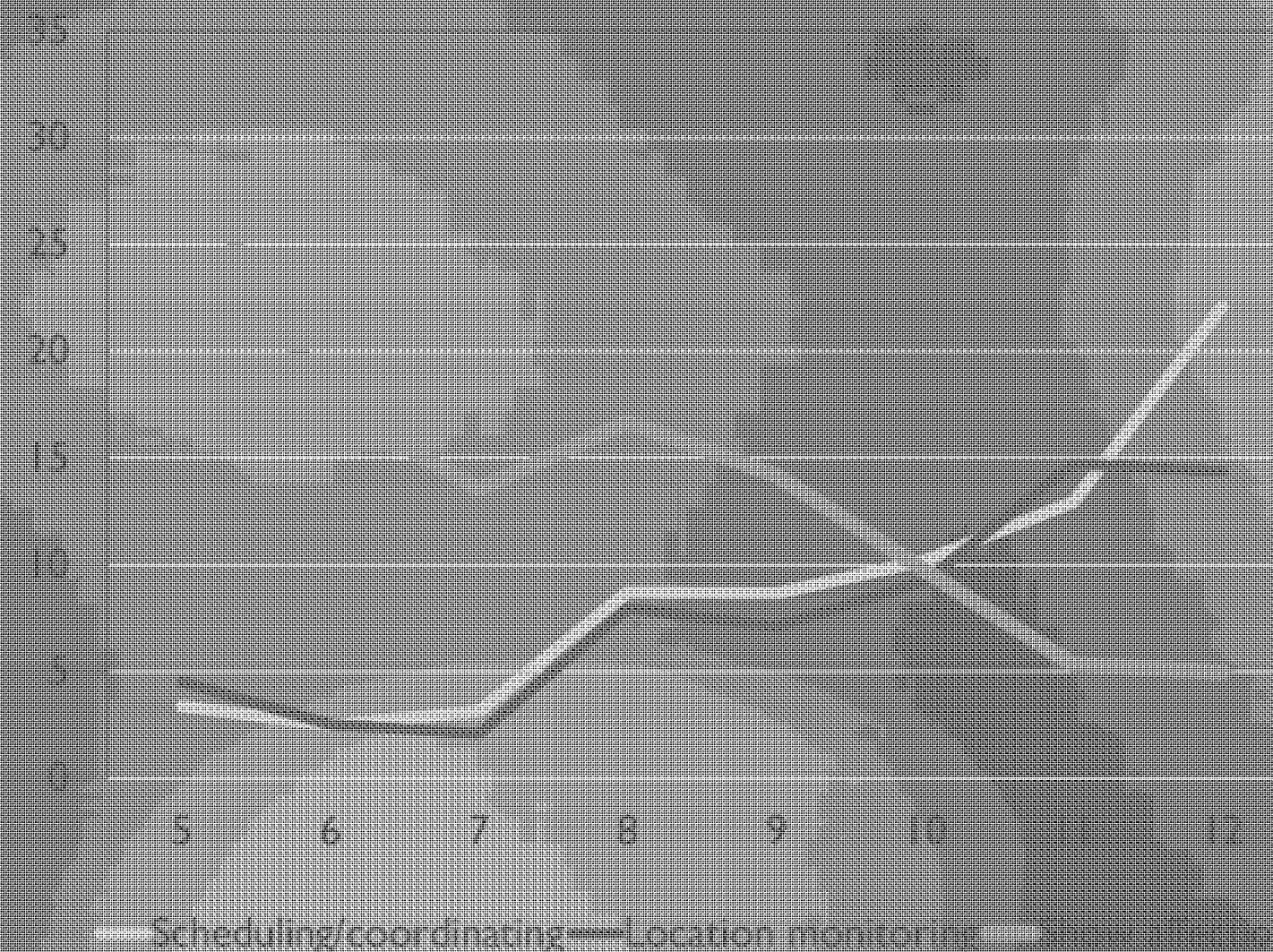
“The initial purpose of getting her the phone in general is so we could communicate with her.”
– Dad of 10yo girl

When they
get to school
in the
morning

When they
leave school
in the
afternoon

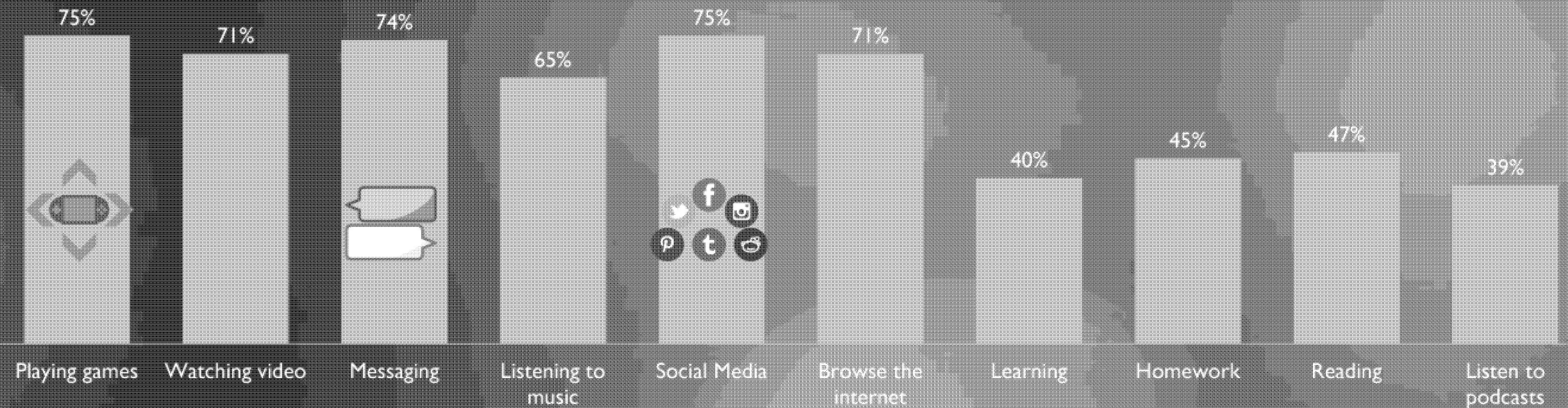
When they
get home

Other plans
they'd like to
make with
friends



And, communication with parents gives way to keeping up with and connecting with peers.

- Tweens are now able to connect with their friends on their own time and in an unsupervised way. Peers become the most important reference group.
- They are more similar to older than younger peers in their phone usage. Their usage becomes more social and outward oriented.



Source: Dabit Trends, AQ4.2. Which of the following list of activities do you use a smartphone for?
(Base: US Wave 275 (11-12))

But, even with newfound freedoms, tweens are still most at home in the analog world. In-person communication is preferred.

- With memory to spare and chatter among peers about the newest/latest/greatest apps, tweens quickly fill their devices with gaming, messaging and social media apps.
- However, this connectivity doesn't replace – nor does it outshine – good, old-fashioned face-to-face hanging out.

A black and white photograph of three tweens in a school hallway. A boy on the left is looking towards a girl in the center, who is smiling and looking towards a girl on the right. The girl on the right has her hand on the boy's shoulder. They are all wearing backpacks.

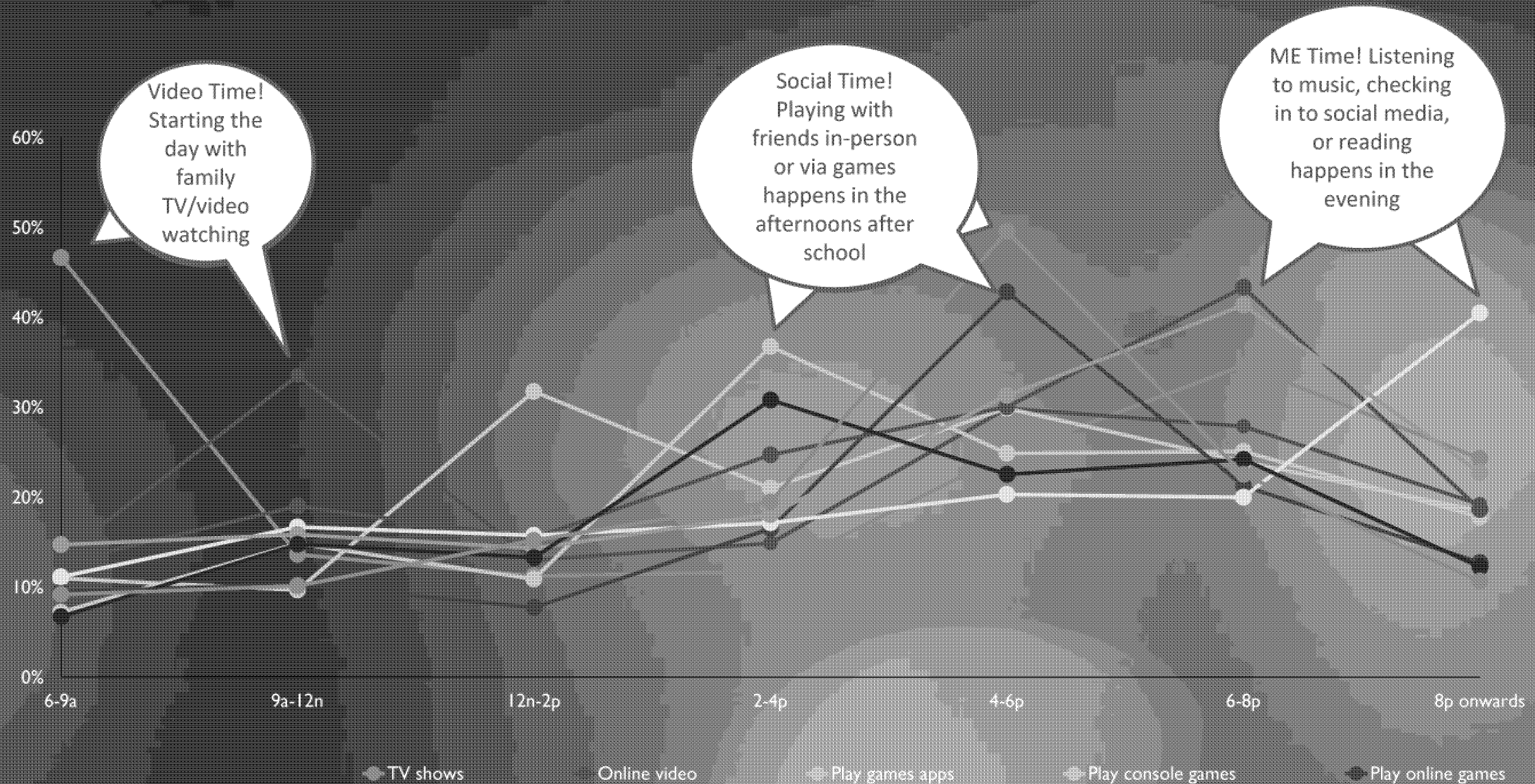
"[If I had a crush on someone] I would message them or just tell them in person."
– 10yo boy

"My friend lives close by...we like to jump on the trampoline."
– 12yo girl

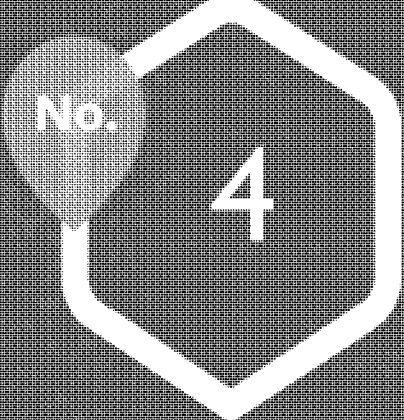
"I usually like to talk to my friends in person."
– 10yo girl

Tweens' digital habits show passive-active-me patterns throughout the day

Digital habits are entertainment driven and made to fit into tweens' offline schedules.



Source: Dubit Trends, AQ5.3. Now we'd like you to tell us the times of day that you normally do [text-sub: your child normally does] these activities.
(Base: US Wave 6 275)



Tweens and Social Media Access

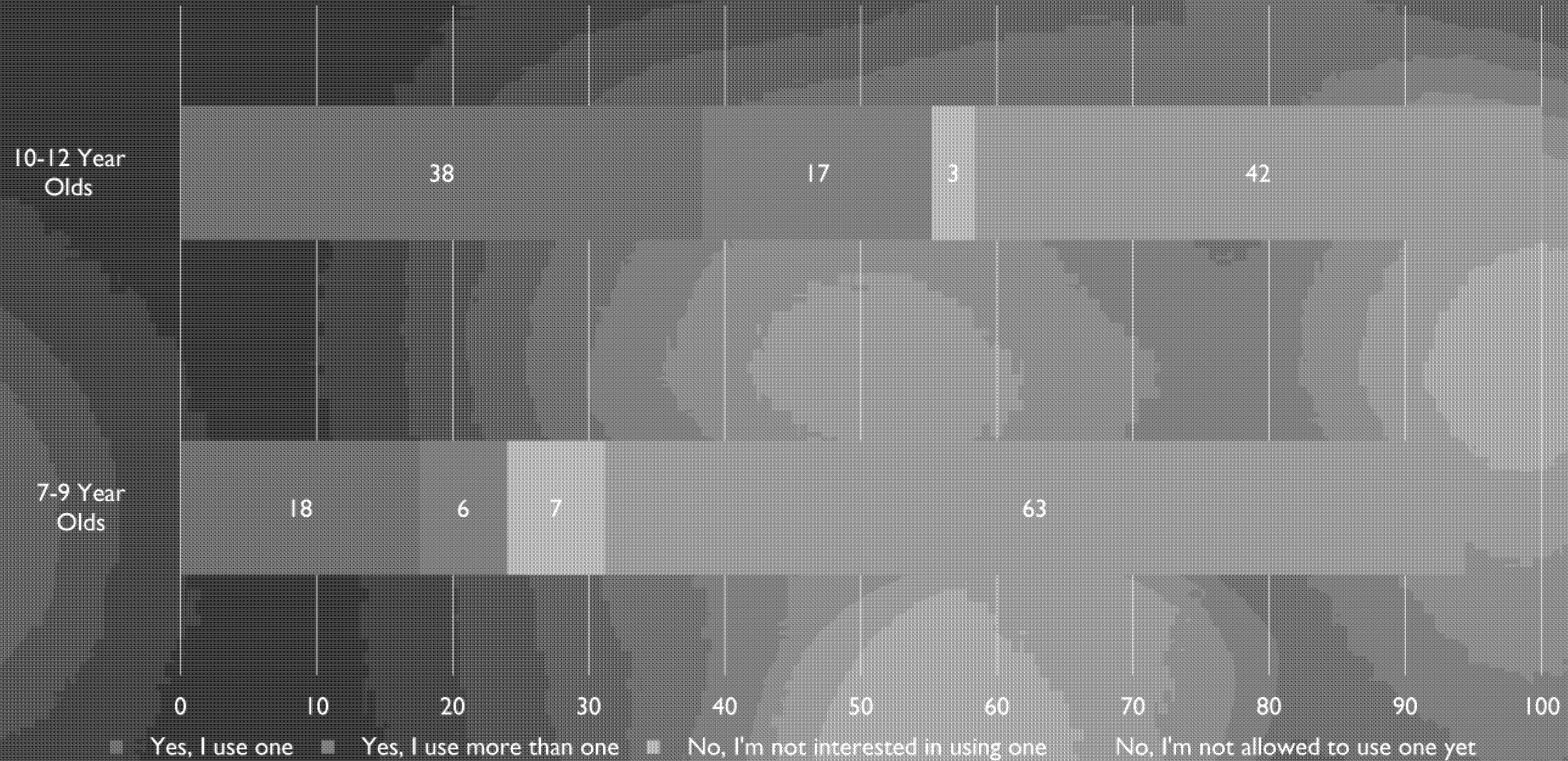
Signing up for social media is a foregone conclusion.

- From older siblings/cousins to peers with older siblings to the news, tweens know what social media is way before they actually start dabbling. Their engagement is really a matter of “when,” not “if.”
- The specific platforms are chosen based on what’s new and being discussed at school – whatever is hot is what’s downloaded. It has to be fun and entertaining first and foremost.
- Whether or not they stay engaged with a specific social media platform depends on whether they are able to deepen existing friendships or create emotional bonds in addition to having fun.

“[I found out about Snapchat] because most of my friends use it.”
– 12yo boy

“My sister introduced me to [Snapchat] last year.”
– 10yo girl

The majority of 10-12 year olds have at least one social media account.



Source: Research Now Survey Oct 2016: Do you have a social media account?
(n=250)

But, tweens are cautious...

They are aware and wary of stranger-danger and bullying as a result of:

- Conversations at home
- Talks at school
- Cautionary tales
- Witnessing issues with older siblings

They're not looking for trouble but they know trouble can find them.

As such, they are apt to be careful with:

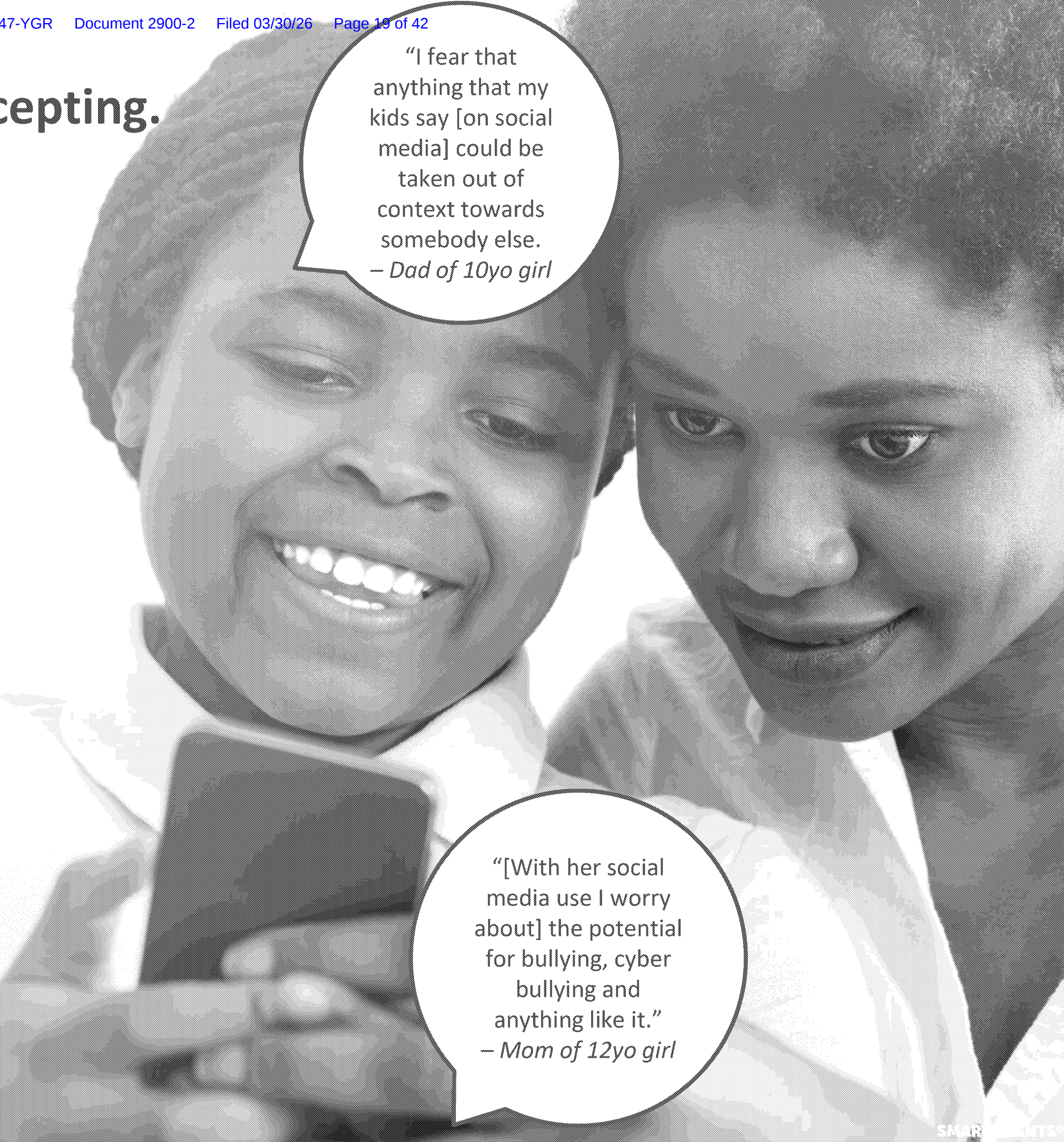
- Keeping their accounts private
- Who they follow/subscribe to/friend
- Who they accept follow/friend requests from
- What they post

"I don't like making accounts on stuff except for Snapchat...I feel safer with just the one thing."
— 10yo girl

"[I'm careful about what I post because] there's a lot of weird people out there and I don't want them seeing what I do."
— 11yo boy

... and parents are leery, but accepting.

- Parents acknowledge the upside of social media:
 - It can be fun, silly, creative
 - It's a great way to stay in touch with friends when you move, change schools
- But they are concerned with their children:
 - Being exposed to mature content, which contributes to the larger concern of innocence lost
 - Accidentally sharing more information than they should, and resulting predator danger
 - Engaging with, or becoming the victims of, bullying
 - Having yet another reason to try to increase screen time
 - Being unable to communicate properly in the real world
 - Tying their self worth too closely to "likes"



"I fear that anything that my kids say [on social media] could be taken out of context towards somebody else."
— Dad of 10yo girl

"[With her social media use I worry about] the potential for bullying, cyber bullying and anything like it."
— Mom of 12yo girl

Online safety is a top concern.

Parents implore kids to only connect with people of whom they know exactly who they are and to stick to kid-appropriate content. Because kids want to stay out of trouble and prove themselves worthy of their parents' trust, they mostly stick to the rules.

Talk with your children about their online activities

69%

Use parental controls

67%

Helped set-up privacy settings

51%

Read the privacy policy

44%

Searched for your child's name online

38%

"We have the parental controls set up so she can't wander into anything inappropriate for her age."

— Mom of 12yo girl

Parents are still gatekeepers for tweens' social media access.

- The majority of parents remain uncomfortable with their kids' social media use
 - Comfort level with tweens' use of Facebook, Instagram, or Snapchat is not materially different
- The top concern for about 7/10 parents whose children use specific social media apps is inability to control the content the child might stumble upon on this app.
 - Uncertainty over who children will connect with and what messages they might receive follow in importance



As such, the leash is very short.

- Parents and kids are often connected on social media
 - Some tweens use their parents' accounts, while others are logged into their accounts on their parents' devices.
 - Most are connected to their parents or other adult relatives, who see everything they do.
- Parents and kids negotiate for ONE social media account at a time
 - If kids prove themselves to be responsible, more are allowed to follow.
 - That is kids' #1 incentive to abide by parental rules.
- Kids are mostly passive or share with a small group of friends only
 - They generally look and like more than they post.

"I follow the iSunny page because it's kid friendly most of the time. If there is inappropriate stuff I just skip over it."

— 11yo boy

Tweens' online social circles are very small.

Tweens connect with family members and real-world friends – and maybe friends of friends – but no one else.

Some follow celebrities or athletes through platforms that allow them to do so, but it's voyeuristic and one-way.

Accounts are almost always private.

"On my [social media] accounts, if someone wants to follow me and I don't know who it is I'm just going to delete [the request] so they can't see what I'm posting and they're not following me."
– 11yo boy

"[On social media] I follow just my friends, the pretty close ones."
– 12yo girl

"I don't really add anyone I don't know."
– 10yo girl

Because the real driver of tween social media engagement is entertainment, not connectivity.

The relatively small world that's created on social media makes sense given that tweens:

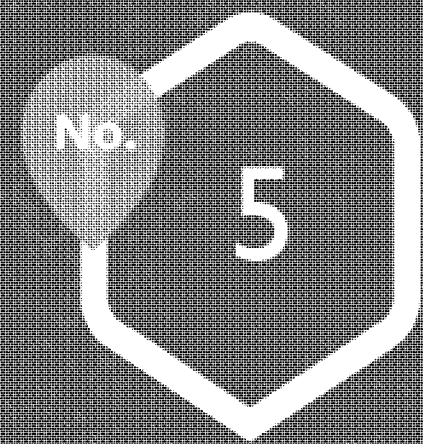
Still see their friends and family on a regular basis in person

Don't always have a ton to say, especially boys

Often find themselves "bored" – and turn to digital content in general to make things fun

"I never really post stuff to my story, but me and my friends have a streak, so I just send stuff to them."
– 12yo girl

"[I get on social media] when I'm bored."
– 10yo boy



Tweens and Social Media Apps

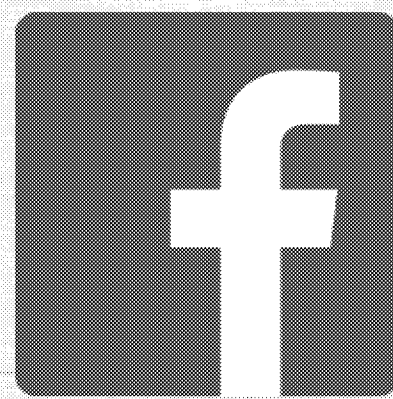
Platform perceptions are based on perceived users bases.

- More than anything else, tweens focus who they believe is using any given social network.
 - It's the first thing they mention when comparing, contrasting and describing.
- But they are somewhat capable of understanding the features/functions/user interfaces that result in specific audiences gravitating towards certain platforms.
- Accordingly, tweens do not feel all social media platforms are for them – or that they necessarily function differently than one another.

"Musical.ly is for kids because it's silly and kids are silly."
– 11yo girl

"I don't really know why younger kids would have a Facebook account because that's for adults."
– 10yo girl



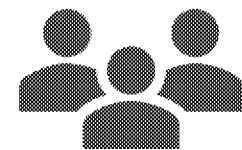


Facebook is for old people.

- Tweens have parents that use the interface – by default, raising awareness and limiting its appeal.
- It's not fun – it's functional.

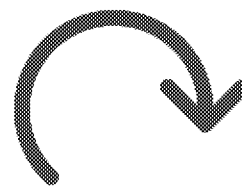
"Facebook is
for old
people – old
as in 40."
– 11yo boy

"A lot of adults have
a Facebook account.
I think that on
Facebook people
post some stuff that
should only be for
adults."
– 10yo girl



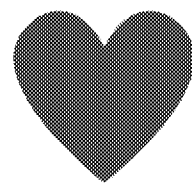
Perceived user base:

- Parents
- Aunts and uncles
- Cousins age 20+



Frequency:

- Rarely, if ever
- Once a week at most
- Only after other apps have been exhausted



Favorite features:

- Funny videos

Platform experiences that result in this user base:

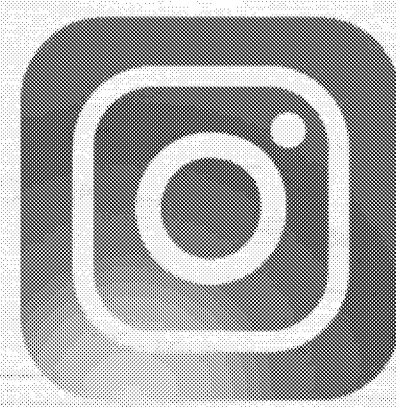
- Delayed communication (Messenger awareness is low, feels separate from the core experience)
- Busy, confusing UX
- Used to post (but not play with) videos and pics
- Lots of advertising (and tweens can't buy online)

What it's good for:

- Keeping tabs on what your family is up to
- Watching videos

"I have
Facebook
Messenger but
I don't have
Facebook."
– 12yo girl

What's Missing: People my age. I have it, but I don't create anything here.

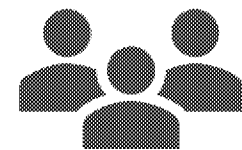


Instagram is for teens.

"Most of my friends are on Instagram."
— 12yo boy

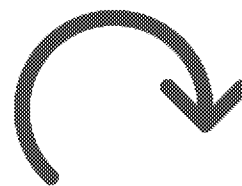
"More people my age are into Instagram."
— 11yo girl

- Tweens discover Instagram from parents, older siblings or friends with older siblings.
- It's more fun than Facebook but functions in many of the same ways



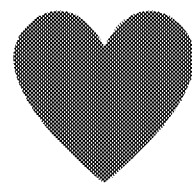
Perceived user base:

- Middle schoolers
- High schoolers
- Some young adults
- Celebrities



Frequency:

- A few times a week
- Only after Snapchat has been checked



Favorite features:

- Looking at others' content

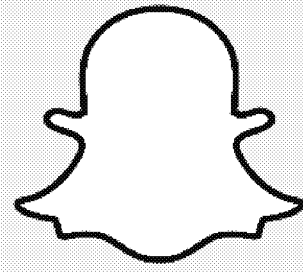
Platform experiences that result in this user base:

- Delayed communication (Direct awareness is low)
- Video/photo editing
- Posting to stories
- Sharing live videos
- Simple UX
- Liking others' content

What it's good for:

- It's primarily a consumption-based app to see what others are up to
- Sharing:
 - Special moments (e.g.: vacation, sports)
 - Celebrations (e.g.: when you're dressed up)
 - Cool things (e.g.: food, shoes)

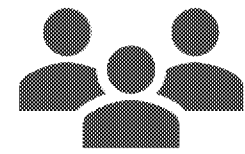
What's Missing: I don't create anything here, but it's cool to look at stuff.



Snapchat is for tweens.

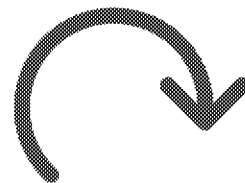
- Tweens have a deep and wide understanding of this platform.
- It's fun, funny, silly and creative – seemingly made just for them.

"Some of the filters are silly so some of the adults are like, 'What is this? This is like too silly and stuff.'"
– 11yo girl



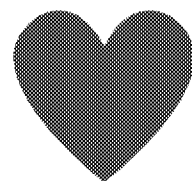
Perceived user base:

- High schoolers
- Middle schoolers



Frequency:

- Multiple times a day
- Almost every day



Favorite features:

- Photo editing
- Streaks

Platform experiences that result in this user base:

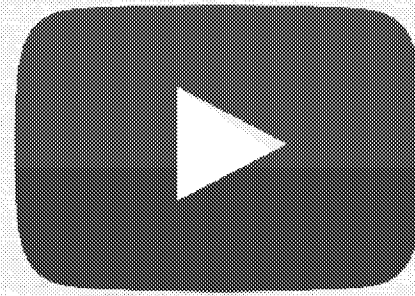
- Large library of timely and ever-changing filters
- Streaks
- Bitmojis
- Temporariness of it all
- Directness of communication
- "Ghosting" and being visible on Snap maps

"Streaks are how many days in a row you Snapchatted someone. My longest one is 137."
– 11yo boy

What it's good for:

- Videos and pictures of funny experiences
- In the moment, spontaneous sharing
- Being random
- Sharing the real you
- Making the most of your camera roll
- Showing your commitment to friends (via streaks)

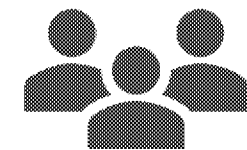
What's Missing: We can't all do things together, and everything goes away again.



YouTube is not seen as social media.

- Tweens know they can comment on videos, but rarely do anything other than “like”.
- Many want to post their own content but aren’t allowed to.

“I use YouTube because YouTube's like a really fun app to go on and just look around or you can look at stuff that you want to do.”
– 11yo boy



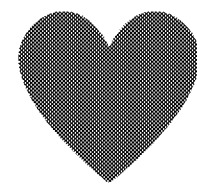
Perceived user base:

- Literally everyone



Frequency:

- Multiple times a day
- Every day of the week



Favorite features:

- Watching favorite YouTubers

Platform experiences that result in this user base:

- Seemingly endless, constantly growing library
- Every format, genre, topic included
- The only place for short-form video
- Incredibly smart suggested videos algorithm

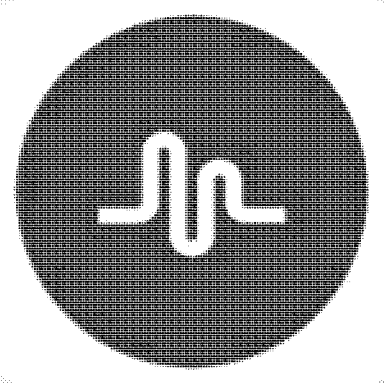
“[On YouTube I find new videos by] going to the home page bucket list channels.”
– 10yo girl

What it’s good for:

- Learning about something of interest
- Laughing
- Accessing cross-network content

“On YouTube I'll either watch like lifehacks or DIYs.”
– 12yo girl

What’s Missing: I don’t connect with my friends here.

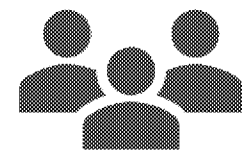


Musical.ly is not seen as social media.

- Even though tweens can comment and like videos, the platform is more a creative outlet than a mode of connectivity.
- The skews heavily female but seems to be made with tweens in mind.

"I got
Musical.ly
when I was
11."
— 12yo girl

"[On
Musical.ly]
you can post
silly videos."
— 11yo girl



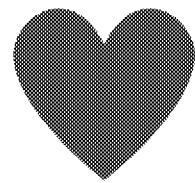
Perceived user base:

- High school girls
- Middle school girls



Frequency:

- A few times a week



Favorite features:

- Creating and editing videos

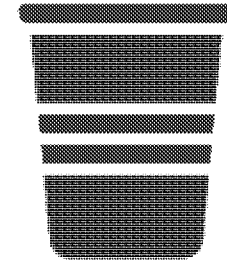
Platform experiences that result in this user base:

- Current music
- Youthful editing options
- Rooted in performing

What it's good for:

- Discovering new music
- Creating videos
- Scrolling through favorite Musers' posts
- Being creative, silly

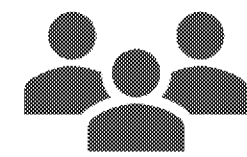
What's Missing: I don't connect with my friends here.



House Party engagement is limited.

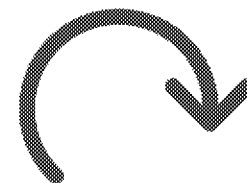
- Many tweens have heard of the platform, but few are using it.
- It simply seems like another video chat that's not much better than FaceTime, Skype and even Google Hangouts.

"Oh yeah, House Party! I've heard of it but I don't know what it does."
— 12yo boy



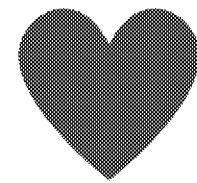
Perceived user base:

- High schoolers
- Middle schoolers



Frequency:

- Rarely



Favorite features:

- None mentioned

Platform experiences that result in this user base:

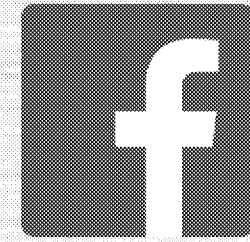
- Video chat

What it's good for:

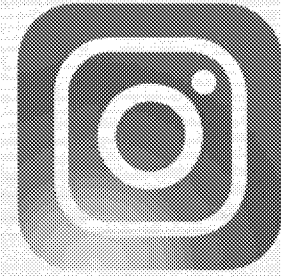
- Video chatting with multiple people

What's Missing: There is only one thing to do here.

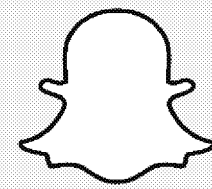
In Sum



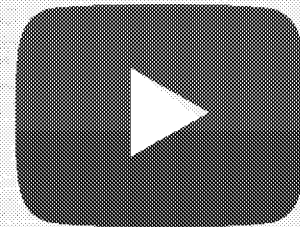
FACEBOOK is social media for my family



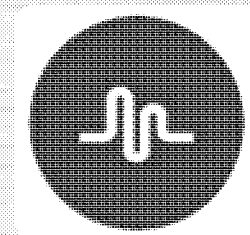
INSTAGRAM is the place to watch stuff and share the best version of my life



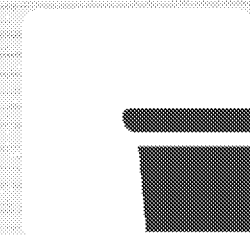
SNAPCHAT is iMessage + FaceTime + Instagram with a way to share the real me



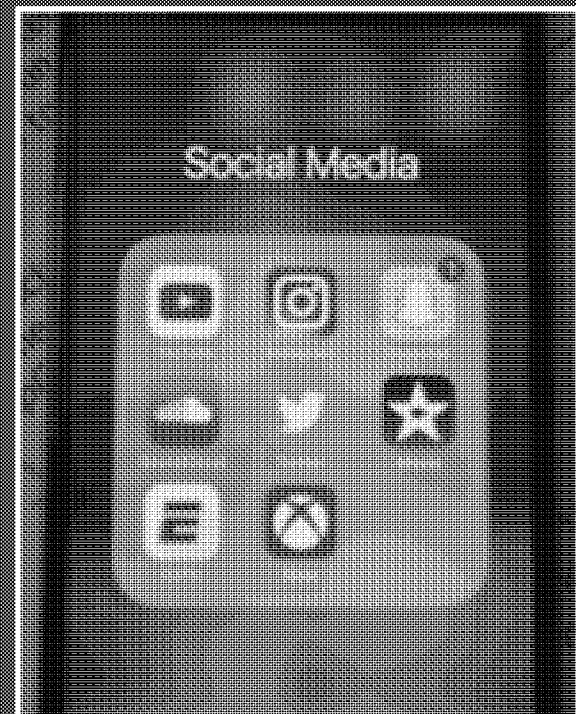
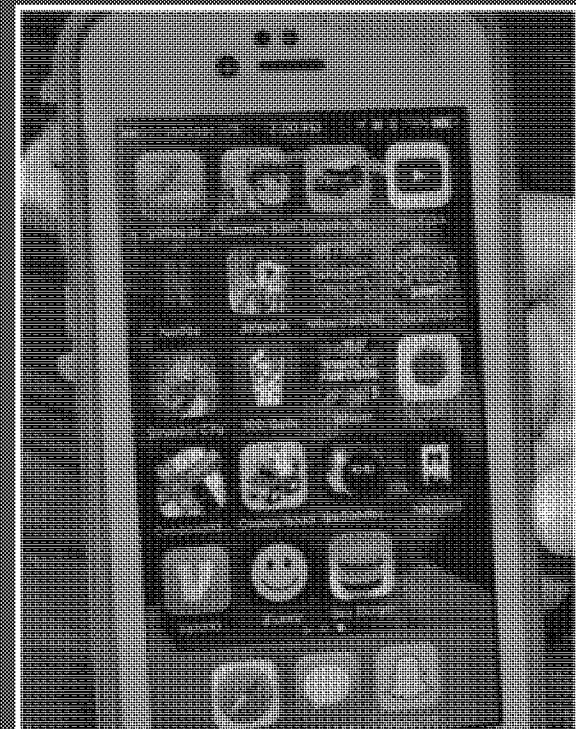
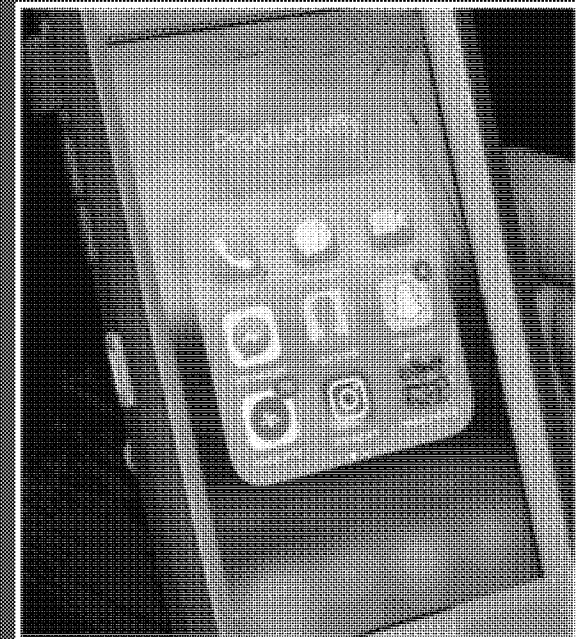
YOUTUBE is the video version of Google

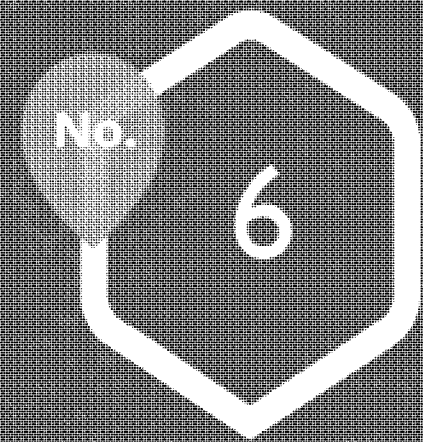


MUSICAL.LY is YouTube + iMovie + Snapchat



HOUSEPARTY is FaceTime for everyone





Tweens and Social Media Needs

None of the existing apps truly fulfill tweens' needs for a social platform.

As is the case with many other categories, tweens are making do with what's been created for kids and/or teens.

They can connect and have fun using existing apps, even though they're not made with a 10 to 12 year-old in mind.

Currently available apps over-index on one vector, but don't provide tweens the variety they crave

Communication (Snapchat)

Entertainment (YouTube, Facebook)

Creative expression (musical.ly)

"[I get on social media] when I'm bored."
— 10yo boy

And it may not be “social media” in the traditional sense.

The need for communication is limited. But, the ability to connect emotionally with friends is important.

The need for documenting and showing one's life is limited. But, the desire to blend offline/online lives is high.

The desire to be part of a group is at all-time high. Tweens need to have fun and their desire see what others are up to is never-ending.

Able to go deep on one's interests is important. But, patience for passive-only consumption is limited. Tweens desire to make something themselves and prefer interactive-consumption models.



Social Media Needs

Use entertainment as a starting point for engagement

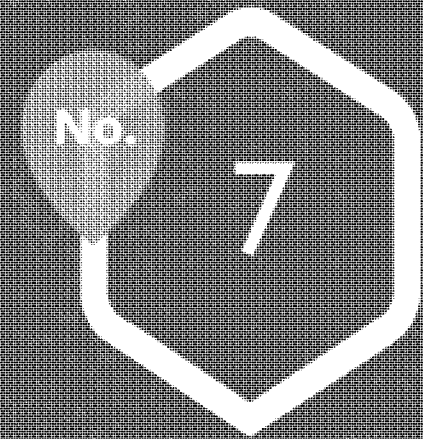
De-emphasize identity projects or communication

Blend offline/online experiences – use digital to get kids to do something IRL

Strengthen and create connections to small circles of friends

Make sharing with others fun

Highlight social/communal experiences



What's Next

Questions?



The research findings in this report are based on a series of qualitative and quantitative studies over the past 1.5 years. Due to the sensitivity of the subject, not all findings and materials are included in this report. If you want to dig in further for your work on tweens, please reach out to me directly!

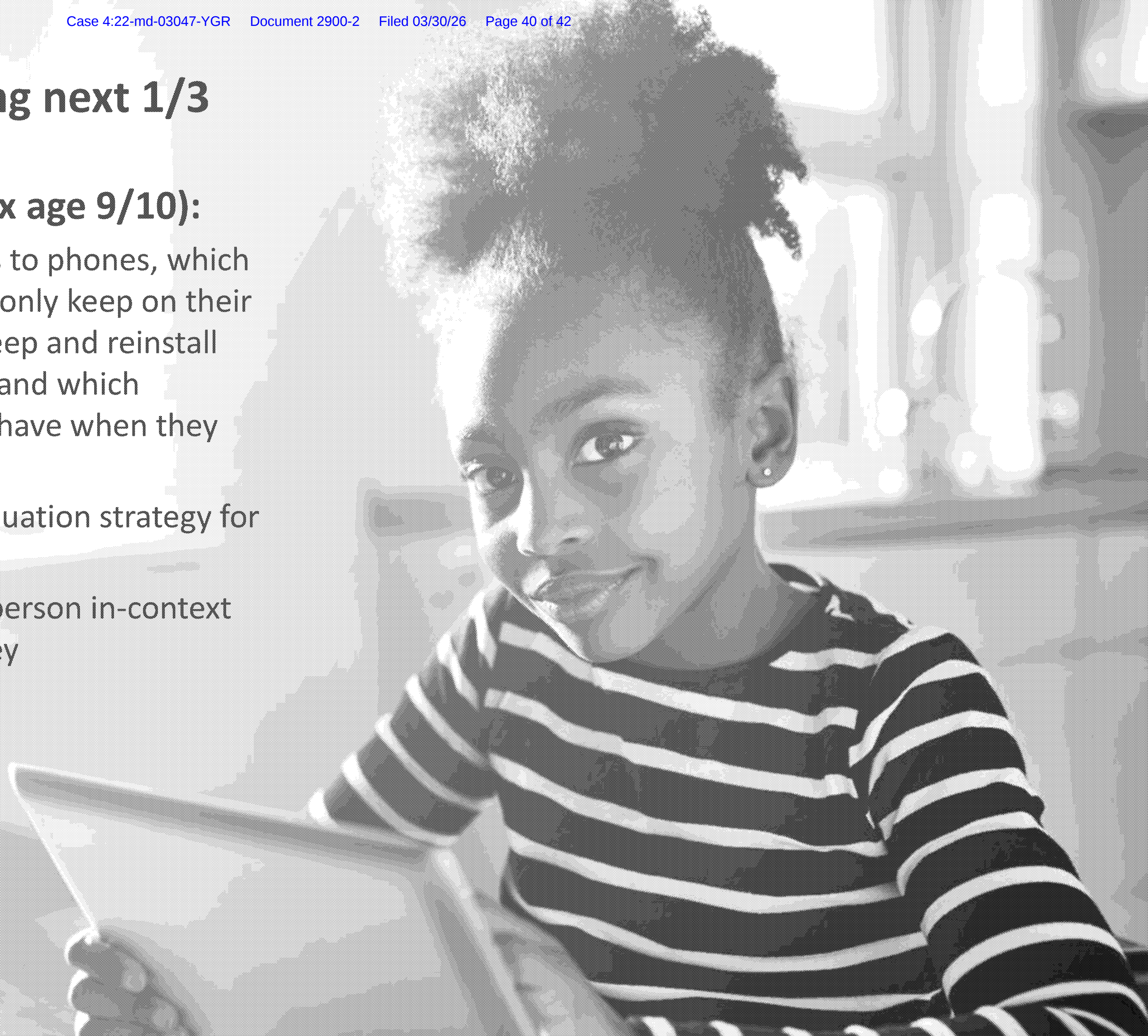
What we're researching next 1/3

Inflection points (approx age 9/10):

As tweens move from tablets to phones, which apps/app categories do they only keep on their tablet, which apps do they keep and reinstall when they get their phones, and which apps/features they aspire to have when they have their own phones.

Objective: Determine graduation strategy for Talk.

Methods: Diary study; in-person in-context research; interviews; survey



What we're researching next 2/3

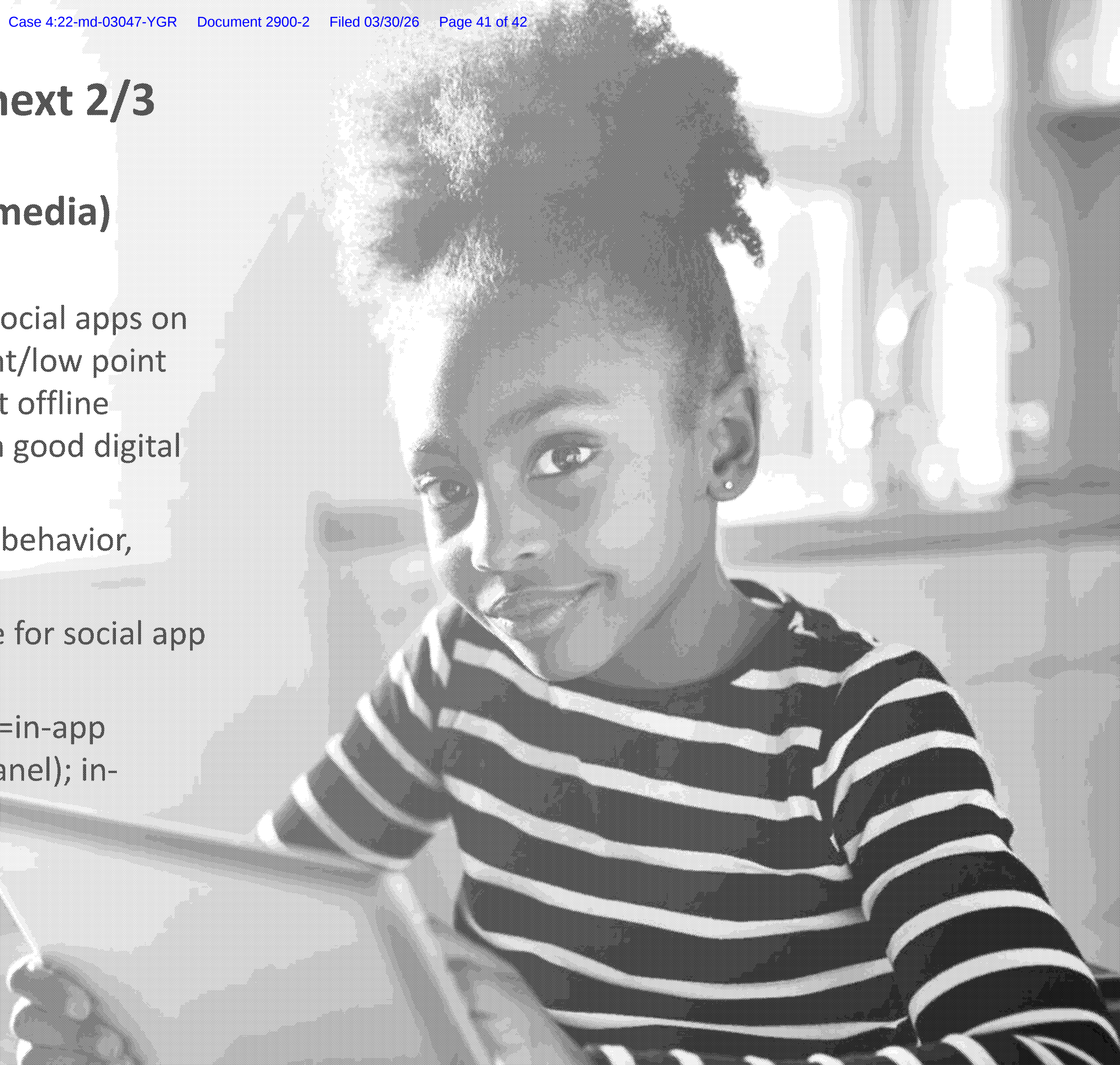
Current phone and social (media) usage (approx age 10-13):

How are tweens currently using social apps on their phones? What is a high point/low point for them about social apps? What offline behaviors currently do not offer a good digital solution?

Objective: Identify patterns of behavior, experiences, and needs.

Objective: Identify white space for social app for this age group.

Methods: Survey; usage data (=in-app actions via Onavo-facilitated panel); in-person interviews; diary study



What we're researching next 3/3

Understand opportunities for our existing product experiences (approx age 10-13):

Which changes to product experiences would need to be made to make FB appropriate for tweens?

Objective: Guide product experiences for how COPPA compliant FB could serve tweens well

Objective: Identify parents' needs for kids' FB experiences

Methods: in-person participatory design activities; parent: child dyads; focus groups with parents; survey; (coordinating with market research re: brand)

