

AMENDED Exhibit 472

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

UNICEF EAPRO Research Questionnaire

Background

UNICEF East Asia and Pacific Regional Office is leading a multi country regional research initiative exploring the different avenues, approaches and opportunities to learning and skills development that adolescents and youth have access to and utilize online.

For UNICEF, while supporting governments to advance quality education and skills for all, it is important to understand how young people are learning online, and how such online presence contributes to different forms of skillsbuilding, including how recreational engagement platforms could contribute to young people's increased knowledge, awareness, and empowerment. It is also of relevance to explore whether and how young people are presently engaged in the co-creation of digital learning and skills building content. These research findings will provide policymakers contextual understanding and information on how adolescents' engagement and participation online is being shaped by their access and interactions online – including through the types and content of learning platforms they are accessing – and social media platforms.

All responses will be anonymous and not associated with participants or their affiliated organization. The final report will be made available online.

- * Countries of interest: Thailand, Malaysia, Philippines, Vietnam
- * Participation format: Key informant interview, English, 1 hour.

Questions

Group 1: Overview

1. How does Tik Tok usage by age group 10-19 differ from usage of other similar platforms like Facebook and Instagram by this age group? What is unique about Tik Tok?

- * [Strategy team may potentially have this data but it does not seem appropriate for us to offer information on minor usage of TikTok and competitor analysis to UNICEF. Suggest that we do not comment.]

- * [Introduce TikTok - extracted from [

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Commented [2]: [REDACTED] Yes, I have created the cleaned up copy of the response here, you may want to refer to this instead[[HYPERLINK](#)

authentically, discover the world, and connect with others. The **For You feed** is part of what enables that connection and discovery. It's central to the TikTok experience and where most of our users spend their time.

- * The For You feed is powered by a recommendation system that delivers content to each user that is likely to be of interest to that particular user. This makes it easy for people to discover content and creators they love, and to connect with others in the community who have similar interests.

- * Unlike other social media platforms, you do not need to have a large network or following for your videos to reach a large number of viewers. While a video is likely to receive more views if posted by an account that has more followers, by virtue of that account having built up a larger follower base, neither follower count nor whether the account has had previous high-performing videos are direct factors in the recommendation system. This hugely lowers the barrier to entry for creators.

- * It is also incredibly easy to create content on TikTok. There is a wide range of filters, effects, sounds, and viral hashtag challenges that anyone can use, even if they are not particularly social media savvy.

- * In addition, TikTok's focus on short video and vertical full-screen scrolling format also sets it apart and appeals strongly to young people, who are smartphone-savvy and crave micro-entertainment and short bursts of distraction.

- * [Highlight age rules] The minimum age to use TikTok is 13 years old globally, and 14 years old in Indonesia and South Korea.

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Supplementary info on recommendation system (if asked)

Recommendations are based on a number of factors, including:

- * **User interactions** such as the videos you like or share, accounts you follow, comments you post, and content you create.

- * **Video information**, which might include details like captions, sounds, and hashtags.

- * **Device and account settings** like your language preference, country setting, and device type. These factors are included to make sure the system is optimized for performance, but they receive lower weight in the recommendation system relative to other data points we measure since users don't actively express these as preferences.

All these factors are processed by our recommendation system and weighted based on their value to a user. A strong indicator of interest, such as whether a user finishes watching a longer video from beginning to end, would receive greater weight than a weak indicator, such as whether the video's viewer and creator are both in the same country. Videos are then ranked to determine the likelihood of a

user's interest in a piece of content, and delivered to each unique For You feed.

Group 2: #LearnOnTikTok / Creative Learning Fund

1. Under the #LearnOnTikTok hashtag, what have been the most popular kinds of content young people (10-19) in the EAPRO region have been consuming?
2. Have there been any regional trends that you have observed? Did young people in specific countries prefer/consume more kinds of content than others?
3. How does Tik Tok provide adolescents with a space for non-formal learning, social engagement and empowerment? Do you think TikTok is more a place for informal learning - 'how to' videos, quick hacks, tips, etc - or is there potential for it to be used as a serious environment for learning? (Have the investments in creating serious content been successful?) What are some ways to bridge this gap?
4. What have been some learnings from the #LearnOnTikTok initiatives? What are the best ways to engage young people to learn? What have been some challenges with learning through this initiative?
5. Could you talk to us about more objectives under the \$50 million creative learning fund - how does it impact the EAPRO countries?

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Talking points:

* [Set context first - taken from [[HYPERLINK "https://newsroom.tiktok.com/en-us/our-commitment-to-covid-19-relief-efforts"](https://newsroom.tiktok.com/en-us/our-commitment-to-covid-19-relief-efforts)]] With tens of millions of students around the world out of school, educators and parents need help facilitating ongoing learning from a distance. The same is true for the millions of creative professionals, from nonprofits like museums to those in the wellness industry, who were suddenly forced to find new ways to connect with people who depend on their services.

* Creative educational content on platforms like TikTok can help, and this is why we set up the Creative Learning Fund in May 2020. The Fund was bundled and launched together with the #LearnOnTikTok hashtag, which serves to amalgamate educational content on the platform.

◦ Note: US Phase 2 of the CLF is now called Instructive Accelerator Program (IAP), launched in March 2021

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* [Program details - objectives, approach, types of content, outcomes] There are two high-level objectives we wanted to achieve: 1) help creators **transfer their real-world skills onto TikTok** and 2) **to encourage creation of instructional and useful content on TikTok**.

* We committed \$50 million in grants globally to encourage and support educators, professional experts, and nonprofits whose real-world skills and expertise can help spread

educational information and useful course material in an accessible, distance learning format.

- This was a global campaign with content crossing borders and reaching audiences everywhere. For example, in the US, CLF facilitated relationships with high-profile partners such as Discovery, which brought multiple NASA/SpaceX livestreams to TikTok's users worldwide.

- Taking into account differences in language and cultural preferences, we also localized campaign efforts were for the SEA region, using different hashtags in each market to complement #LearnOnTikTok. Examples:

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- . ID: #TikTokPintar, #SamaSamaBelajar, #TikTokHarbolnas
- . MY: #TikTokGuru
- . PH: #EduSGotTalent2021, #universitytips
- . TH: #TikTokUni
- . VN: #HocCungTikTok, #TikTokMentor
- . SG: #learningisfun

- We engaged top creators in each market and worked with local broadcast stations to amplify the reach of the campaign. These local personalities have the language capabilities, cultural understanding and networks to create and disseminate relevant and appealing content for viewers in that market. Examples:

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- . ID: [REDACTED]
- . MY: [REDACTED]
- . PH: [REDACTED]
- . TH: [REDACTED]
- . VN: [REDACTED]
- . SG: [REDACTED]

- We focused on encouraging three key categories of educational content as a start:

- Motivation & Advice
- DIY & Life Hacks
- Science & Education

- As the campaign took off organically, community creators also contributed actively to boost the diversity of content, branching into categories such as food & drink, humanities, animals, beauty, fitness & health, fashion, art, and more.

* As of July 2021, the #LearnOnTikTok hashtag has over **1.8 million** pieces of content and **135 billion** video views. We estimate that approximately half of the video views came from users below 18yo.

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- Globally, content related to science, technology, and education was a consistently popular category. This includes medical knowledge (e.g. birth, dermatology, dental), science experiments, math tricks, human body facts, etc.
- In the SEA region, humanities content such as cultural and historical fun facts, language tips, were also popular.
- More examples - food and drinks, including how to recipe videos

* #LearnOnTikTok is now an enduring content category even after the active campaign phase is over.

* [Learning points / Challenges] One of the key learning points from the campaign was the importance of delivering high-quality educational information in a creative, concise, fun and engaging way. Our attention spans on social media are very short in general, and especially so for younger audiences. This is why educational activities are best kept short, which is where a short-form video platform like TikTok comes in as a great tool. The discoverability of topics through short videos is exciting, and entices curiosity to learn more. However, there is a diverse pool of creative content vying for our attention, and some educational institutions such as museums faced challenges in producing educational content that attracted views due to a relative lack of social video creative savvy.

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- Note: In initial phases of CLF, videos are 15-60s, and now IAP content can be up to 3mins

* To address this, TikTok launched the online Creator Portal in Jan 2021. The portal provides insights, tools, and resources to support creators in creating quality content, including compelling educational and instructive content. It offers advice on a range of best practices from content creation (e.g. from the basics to complexities around creativity, storytelling etc.) to personal branding and monetization.

* [Highlight TikTok's value and conclude - taken from [HYPERLINK "https://newsroom.tiktok.com/en-gb/bringing-together-entertainment-and-learning-on-tiktok" \h]] Video is a huge and powerful learning tool. We want people to turn to TikTok not just for entertainment, but to learn something new, to acquire a new skill, or simply get inspired to do something they've never done before. People are already doing this, and it's a trend we want to get behind and accelerate.

* As an extension to the successful #LearnOnTikTok campaign, TikTok also tested a new product experience in selected markets called the 'Learn feed', which is an alternative to the current 'Following' and 'For You' streams, giving TikTok users a dedicated place to discover how-to and informative videos that take viewers through making food, producing art, how scientific processes work and more.

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* This could provide a useful channel to connect more young audiences to valuable, important educational content for both non-formal learning (such as life skills), as well as content related to the formal education curriculum.

* Other ways in which TikTok has spread educational information include through providing prominent 'in-feed' advertising spaces for NGOs, trusted health sources and local authorities to share important messages, and hosting livestreams with representatives of WHO, IFRC and other popular voices in public health and science.

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Supplementary info (only if asked?) - for GR/PR/Legal advice if we can share

* 2,400+ creators and partners were engaged to create ~134,000 instructional TikTok videos over a campaign period of 5-6months

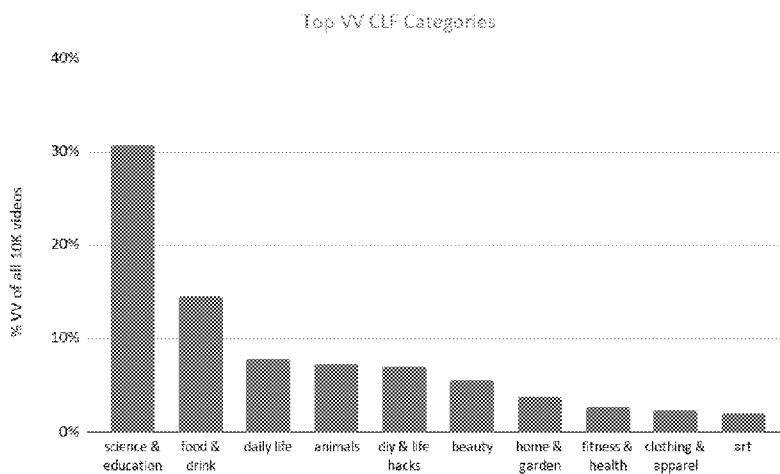
* In the US, individuals/organizations engaged were incentivized with cash or ad credits to post 4-5 instructive TikTok videos per week during the campaign period. In SEA, we adopted a competition/giveaway format to encourage participation, rather than through direct incentivization.

* We also had plans for a curriculum integration program to bring TikTok to the classroom (and the classroom to TikTok). However it ran into blockers as initial stakeholder feedback ranged from a high barrier to entry around student privacy and content controls to partnering with classroom teachers. Efforts and resources were redirected to focus on building up the accelerator/grant and creator portal pillars instead.

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(graph below for internal reference only as well)



Group 3: Beyond educational content

5. **What have been some of the most popular online campaigns on Tik Tok by adolescents in the region? How did they express themselves through the use of contemporary forms of language like memes, gifs, emojis and hashtags?**

- * Popular content differs by market depending on factors such as local culture, events, trends, thematic challenges, and top creators. Campaigns could be initiated by TikTok, by users, or in collaboration with brands.
- * In general, most popular campaigns include those related to international or national-level events such as Olympics, Euros, Independence Day, National Day, as well as large-scale cultural festivals such as Songkran, Hari Raya, Lunar New Year, etc. Examples of other popular categories include beauty, fashion, food, education/news, comedy, dance, gaming, anime, kpop, etc.
- * TikTok has a range of tools that creators including young people can use, from filters to effects to stickers, hashtags, sounds, and so on.

Group 4: Trust & Safety

7. **How does one check for credibility/accuracy for the content created? Our primary research has revealed that young people lack the ability to tell the difference between 'truth and lies' on the internet, and might often fall prey to misinformation/unverified knowledge.**

- * [Reiterate TikTok's stance first - taken from [[HYPERLINK](https://newsroom.tiktok.com/en-au/tiktok-partners-with-fact-checking-experts-to-combat-misinformation) "https://newsroom.tiktok.com/en-au/tiktok-partners-with-fact-checking-experts-to-combat-misinformation" \h]] In addition to fun and engaging content, TikTok also serves as a place for learning and education. However, as content and social platforms increasingly encounter the challenges of misinformation, it can be difficult for users to identify truths from falsehoods. Such misinformation or deliberate disinformation can cause real world harm, and we are committed to protect and improve our users' learning experience on TikTok and curb the proliferation of fake news.
- * We have adopted a multi-pronged approach to tackle mis/disinformation on the platform.
- * First, we have efforts geared towards **improving media literacy**. We worked with expert organizations in this field to create safety toolkits for parents and teachers containing information and tips on a safe in-app experience, and collaborated popular creators on a series of safety videos named 'Be Informed', covering

- "[HYPERLINK "https://www.tiktok.com/@tiktoktips/video/6854300350510402822" \h]" asks users to find out who is authoring the content that they see.
- "[HYPERLINK "https://www.tiktok.com/@tiktoktips/video/6854302292800179461" \h]" challenges the TikTok community to analyze the visual images they come across.
- "[HYPERLINK "https://www.tiktok.com/@tiktoktips/video/6854297925187685638" \h]" reminds users to consider how their experiences influence what they believe.
- "[HYPERLINK "https://www.tiktok.com/@tiktoktips/video/6854295790249151750" \h]" encourages users to reflect on whether the content they want to share, should be shared.
- "[HYPERLINK "https://www.tiktok.com/@tiktoktips/video/6854304331622010118" \h]" helps users determine whether statements are expressing truths or beliefs.
- "[HYPERLINK "https://www.tiktok.com/@tiktoktips/video/6858101837313232133" \h]" shows users that they can control what they see.

* As part of #LearnOnTikTok, we also launched the #FactCheckYourFeed campaign in selected markets from May 2021 to help equip our community with the skills they need to critically engage with content, navigate our platform safely and guard themselves against potential harms.

- In the UK, #FactCheckYourFeed kicked off with a series about critical thinking and news literacy, covering topics including how to think critically and build an argument, recognising fake news and misinformation, and how to consume a balanced 'news diet'. Subsequent installments covered financial literacy, including how to make informed financial decisions, getting the most out of research and understanding financial terminology and jargon, as well as identifying misleading information about diet and exercise.

* Second, we increased our efforts to identify unverified content circulating on the internet that may appear to the public as 'facts' or 'news'. In Oct 2020, we announced the launch of our Asia Pacific Fact-Checking Programme in partnership with industry-leading fact-checkers AFP and Lead Stories. This third-party fact-checking program leverages a team of fact-checkers who review and verify reported content. Once the information is confirmed to be false or misleading, we take proactive steps to remove the content in line with our Community Guidelines and notify the user accordingly.

* Sometimes fact checks are inconclusive or content is not able to be confirmed, especially during unfolding events. In these cases, a video may become ineligible for recommendation into anyone's For You feed to limit the spread of potentially misleading information. In Feb 2021 we went one step further to inform viewers when we identify a video with unsubstantiated content in an effort to reduce sharing.

- If a viewer attempts to share the flagged video, they'll see a prompt reminding them that the video has been flagged as unverified content. This additional step requires a

pause for people to consider their next move before they choose to "cancel" or "share anyway."

- When we tested this approach we saw viewers decrease the rate at which they shared videos by 24%, while likes on such unsubstantiated content also decreased by 7%.

- * Third, we have put systems in place to allow our users to easily report misinformation in-app, provide users with access to trusted and authoritative information, and expanded our in-house team responsible for detecting and preventing misinformation and disinformation.

- COVID-19: we introduced an in-app notice so that when people searched for hashtags related to the pandemic, they would be provided with easy links to the World Health Organisation's website.

3. What safety mechanisms exist on the Tik Tok platform? What are some of the most prevalent risks faced by those in the age group of 10-19?

- * [Age rules] The minimum age to use TikTok is 13 years old globally, and 14 years old in Indonesia and South Korea. We are committed to upholding this standard and have several strategies in place to enforce it, including:

- Age-gate at sign-up: industry-standard age-gate where people are required fill in their complete birthdate to discourage them from simply clicking a pre-populated minimum age. If someone does not meet our minimum age requirement, we suspend their ability to attempt to re-create an account using a different date of birth.

- Removing suspected underage users: First, we train our safety moderation team to be alert to signs that an account may be used by a child under the age of 13. We also use other information as provided by our users, such as keywords and in-app reports from our community, to help surface potential underage accounts. When our safety team believes that an account may belong to an underage person the account will be suspended.

- * [Content and feature risks] Minors could be exposed to risk via several ways on the platform -- when they create content (e.g. inappropriate body exposure, oversharing of personal information), consume content (exposure to developmentally inappropriate themes such as sexualized content, violent and graphic content, dangerous activities), or when they interact with others (e.g. harassment and bullying, attention from predators).

- * Our safety mechanisms to safeguard against these risks include:

- Family Pairing - links a parent's TikTok account to their teen's and once enabled, the parent can directly manage key safety controls for their teen's account

- Restricted Mode - limits the appearance of content that may not be appropriate for all audiences
- Age gating certain features - Direct Messaging and Livestream features are only eligible for users who are 16 years old and above
- Privacy by default - the default privacy setting for all users 13-15 is private. This controls who can see and interact with you and your content.
- Screen Time Management - digital well-being feature
- Reporting content, accounts or comments - removing content that violates our Community Guidelines or Terms of Service.

Detailed information can be found in our [HYPERLINK "<https://www.tiktok.com/safety/en-us/>" \h].

Group 5: Crystal ball gazing

9. **What do you think are some opportunities/future trends to ride on for the future of education? What about for young people who might not have access to the internet/digital technologies?**

- * [Suggest to keep comments short here]
- * Shift towards a hybrid physical-distance learning model in the long run. Tech would have a place in the physical classroom and the classroom would have a place on the Internet/social media.
- * Potential for greater collaboration between educational institutions/teachers and social media platforms to engage and deliver content to youths, in edutainment format
 - Product features such as Livestream (longer video)
 - Supplementing regular classroom curriculum content with practical life hacks / tips

Appendix

References:

[HYPERLINK
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<https://withcontent.co/southeast-asia-edtech/>

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Newsroom:

Apr 20 (US) <https://newsroom.tiktok.com/en-us/our-commitment-to-covid-19-relief-efforts>

May 20 (US) <https://newsroom.tiktok.com/en-us/investing-to-help-our-community-learn-on-tiktok>

Jun 20 (UK) <https://newsroom.tiktok.com/en-gb/bringing-together-entertainment-and-learning-on-tiktok>

Oct 20 (APAC) <https://newsroom.tiktok.com/en-au/tiktok-partners-with-fact-checking-experts-to-combat-misinformation>

Jan 21 (US) <https://newsroom.tiktok.com/en-us/tiktok-makes-creating-easy-with-creator-portal>

Feb 21 (US) <https://newsroom.tiktok.com/en-us/new-prompts-to-help-people-consider-before-they-share>

Research request:

