

AMENDED Exhibit 545

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

Produced in Native



How to
responsibly
grow teen usage
on YT?

Agenda

2022 Highlights and learnings

2023+ Teen Strategy

2023 Roadmap Highlights | Measurements

Defining the best practices and Teen NS metrics to **measure** success

LEARNINGS

Meaningfully assess teen impact from launches

Aggregate treatment effect is driven by large user segments while *(smaller) strategic segments effects, like teens, are likely missed both positive and negative.*

It's hard to impact the broadest set of teens with product interventions

Declared Teen has low recall. Only 27% of teens on YT declare 13-17 We think we can improve this...

Can we accurately run experiments on Teen slice?

Declared teens only ~3% of DAUs but precision is good enough (per DS) to run experiments ([source](#)). That said

HOW WE PLAN TO ADDRESS THE ISSUES

Define a new model to **identify a broader slice of teens** to experiment with and launch updates (teen taste model)

Share **DS best practices** on how to run effective experiments and measure impact with teens [more details](#)

2023 Roadmap Highlights | Responsibility

Guardrails to responsibly grow teen viewership

Problem

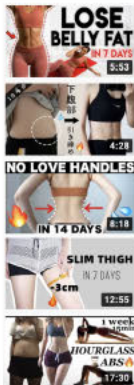
PROBLEMATIC CONTENT

HABITUAL HEAVY USE

6

Approach

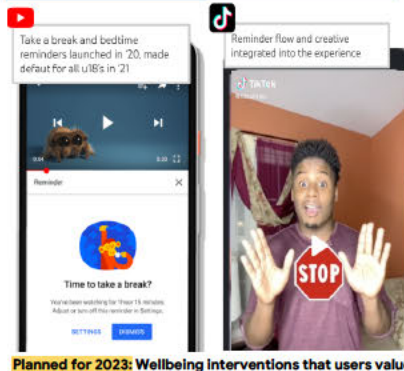
Disperse VIBE content & Appropriate quality recs



Initial Launch- Jan 2023

Negative Social Comparison - defined part of VIBE

Empower agency & foster self-regulation



We plan to use these guardrails (and a few others like MA view rate) to make sure we get the 'right' growth

We are also evaluating an external teen wellbeing moment later in 2023

ATTORNEY-CLIENT PRIVILEGED

- Going a level deeper into each
- For problematic content
 - we are focused on an area our panel of **child development experts pointed us to** on content rabbit holes
 - Specifically where Teens could be exposed to **'negative social comparison' content**
 - Across a few areas to start: **beauty, weight loss and social aggression**
 - This is **non-violative content**, not something you'd see as a singleton and think twice
 - Like a **video about make up contouring to make your nose look thinner**
 - In volume its a problem
 - Eg if you see an hour long string of these videos its hard for a teen to not think they have an ugly nose
 - Eg shredded six pack, e tc
 - We have built a classifier to identify this content
 - Internally called VIBE (why?) => **V**olume **I**mpacts well-**B**eing
 - When a teen is watching one of these social comparison videos, **we ensure the recs afterward**

- **are not more of this type of content**
 - This should launch in Q1
- **For habitual heavy use**
 - We have tools today like take a break and bedtime reminders, but these are clunky
 - They are **buried in settings**,etc
 - **TikTok**, otoh, has wellbeing reminders by popular creators embedded in the feed, making them both more effective and less annoying
 - We are working on such an approach for YT shorts, using popular **YT creators**
- For Risky participation
 - We are focused on helping Teens understand the risks when they share on YT
 - We do this via **in-product messaging and tips**
 - dont tell people your name, where you, be civil, etc.
 - Being in-product is super important vs. out-of-product help center articles or marketing sites
 - which dont attract much user (let alone teen) attention
- We have a few other options in the hopper as well
 - Such as looking at ways to boost better content to teens, but too early to share more here

Age and Revenue vs Users vs Engagement

trial

% Rev % Users % WT



13_17

18_24

25_34

35_44

45_54

55_64

65_UP

UNKNOWN

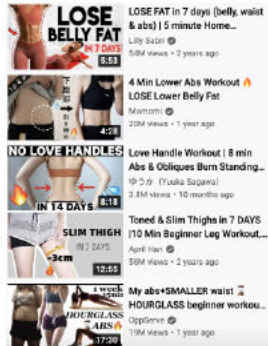
Logged-In, Non Premium Users; Declared age bucket



2023 Roadmap Highlights | VIBE Wellbeing Content updates

Volume Impacts well-Being (VIBE)

Non-violative, non-borderline content that in repetition or high volume impact teen wellbeing



Slide 1

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feedback from [REDACTED]:

Vibe - how to frame on how this is important to Teen Growth? Is Vibe enough?

[REDACTED]; 1/28/2023 3:23:15 AM

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added appendix slide to show that our teen responsibility efforts in 2023 guardrail and complement our effort to grow teen viewership

<https://docs.google.com> [REDACTED]

[REDACTED]
[REDACTED]

1/27/2023 2:31:42 AM

11

i think we have to address head on how we plan to answer the MLR feedback around impact proof before moving past US/VOD. any thoughts on this?

James Beser; 1/27/2023 3:28:33 PM

6

we can measure their repeated views in a session (pending legal) and can also do a UXR study

[REDACTED]; 1/28/2023 3:23:15 AM

Why Now? YT can do more to support teens and their wellbeing

From teen perception survey responses and the internal responsibility product audit, YT risks falling behind



Teen wellbeing & mental health are in “crisis”

U.S. Surgeon General Issues Advisory on Youth Mental Health Crisis Further Exposed by COVID-19 Pandemic

Get off social media after a half hour and you might be happier

A new study recommends limiting your time on social media to around 30 minutes a day.

Increased regulatory scrutiny & legislation for tech companies



platforms and other interactive digital service providers should be required to prioritize and ensure the health, safety and **well-being** of children

¹ Source: Comparison on Youth Responsibility Product Audit

² Source: Q4'21 Brand Health Tracker, Showing TB/T2B perceptions among weekly+ users of the platform aged 14-17 years old.

³ US Surgeon General Issues Advisory on Youth Mental Health Crisis

⁴ Source: Whitehouse FACT SHEET President Biden to Announce Strategy to Address Our National Mental Health Crisis

Privileged & Confidential

If you remember from the comparison of youth responsibility study a couple months ago, there's a gap and teens want us to do more to support them

1. We know that for Gen Z, responsibility is a platform differentiator
2. Regulators and KOFs are increasingly focused on teens and not just u13. In the State of the Union address, the White House administration urged Congress for more legislation to protect the safety and well-being of youth.
3. This is also an area where other companies, especially youth-focused companies, have started to invest significant resources. From our Brand Health Tracker data. Teens think Instagram care more about its users than YT in Brazil and we're seeing a similar directional trend compared to Tik Tok in the US. Teens also think YT cares about its users **less** compared to the 18-44 age group. Thus, the youth are often more critical of YouTube when it comes to well-being, compared to other platforms and users from older age groups.

Our challenge here is to figure out how to apply some of our learnings on quality, safety, parent tools, and responsibility for younger children to teens

2022 Recap | **Understood challenges with current measurements**

Responsible

Fun

7 Measurement

17

LEARNINGS

Declared Teens has acceptable Precision but low Recall

Issues → P/R (66/27). Teens mostly declare themselves to be older. Only 27% of them declare themselves to be in the same age bucket. [\(source\)](#)

Using daily updated age buckets for GenZ measurement not ideal

Issues → We are mixing true user behavior change and age bucket change which does not paint the right picture [\(source\)](#)

3 of NEW MAU are GenZ users (13-24)

Issues → GenZ users are much less likely to retain after 1 yr retention compared to non-GenZ retention of **1** [\(source\)](#)

GROUNDWORK for 2023

Defined a new way to measure teen engagement and

1 [more details](#)

1 for Teens unblocked by legal

18 Focus on "new users" and identifying opportunities to improve the experience.

Slide 1

18 This one seems out of place as it's a growth strategy vs measurement.

James Beser; 1/27/2023 3:02:12 PM

13 might want to clarify that these are declared GenZ, which might actually includes a lot of teens

[REDACTED]; 1/27/2023 1:56:08 AM

7 Problems

1. Can run experiments on the declared demo
2. Teams are not evaluating against Teens
- 3.

Learnings

- Best practices

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Jyoti Ramnath; 1/27/2023 5:36:17 PM

17 [REDACTED] feedback from

[REDACTED]: can we state what is size of teens globally to show how big the opportunity is globally?

[REDACTED]; 1/26/2023 11:40:03 PM