

AMENDED Exhibit 724

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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Value of Younger Kids investments to YouTube

Nov 15, 2022

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Executive Summary / tl;dr

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Problem Statement

- In 2015, we started our journey with YTK for very young kids – a fun/delightful experience but we weren't meeting min-bar expectations around safety/quality
- Over the course of the next few years (and various escalations including Greenlight, Crosswalk), we did a ton of content safety/quality and parental controls work to get things stable in YTK.
 - In doing so, we were largely in reactive mode, adding things to shore up our story... heavy onboarding flow, search on/off control, PAM (partially rolled out), age-based content options, corpus revamp, and more... (envisioning slide showing all this stuff we layered in over the years)
- We had a key transitional moment in the form of Crosswalk. We introduced Content-based solutions (again out of an urgency moment) like MFK Island on Main, Age Gating, etc
 - We knew going in that these approaches were brittle (donut slide) – we expected that they would break down over time – ultimately what started breaking it was the Shorts launch.
 - We also started lining up the chess pieces to have a user-based approach (SupeX), and we made a number of YTK changes as outlined above.
- We have SupeX now, and we got things relatively stable in YTK, in the sense that there aren't huge escalations about YTK anymore. Is it "good enough" now? Have we solved for u13s (especially younger ones)? Our contention is no.
 - While we seem to have solved the safety/quality issues in YTK, we aren't really in a good state overall today. User adoption and retention in YTK is low (largely as a result of the changes we've had to make over the years, but also because of how it's structurally built).
 - Retention in SupeX is good, but user adoption in SupeX is low, mostly because we rely on Unicorn account creation as the entry point.
 - **Overall, the vast majority of u13 usage is not happening in our current user-based solutions – it's happening anonymously on YT.**
- Why is this a problem? Why does it matter? We've created our responsible surfaces, so we've done our part.

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- With Younger Kids, while we may be doing OK in terms of them liking YT overall (mostly MFK on Main), by the time they turn 8 or 9, we are losing them to TikTok ([HYPERLINK "https://www.tubefilter.com/2022/03/09/youtube-tiktok-statistics-emarketer/" \h]). They aren't graduating into tween (and eventually teen) users.
- Today's teen usage is already low. We should consider today's teens effectively lost. We aren't the dominant platform for them, and we likely aren't going to get them back. They will continue using TT, IG, etc.
- **If we want to be successful with teens, besides building features to retain them once they arrive on YT, we also need to focus on the experience for the next generation of teens – today's younger kids and tweens.** That is why work on these segments is so critical.
- **This is an existential question for YT - We need to make big bold bets in this space if we want to ensure that we keep these users on the platform to become teens on YT.**
- We need to think about younger kid users differently.
 - We have been looking at these users with the lens of the same overall YT platform metrics (DAVs, WAVs, etc). We treat these as growth and retention metrics per surface. This doesn't make sense, because these surfaces are naturally short-lived per-user.
 - We should expect some regular amount of churn that's much higher than the experience for teens/adults. Kids grow up, and grow out of any solution that we'll build for them. It's not about fighting that - it's about recognizing when the inevitable is about to happen, and shepherding them to the next best experience. Guiding them to becoming teens/adults.
 - **We need to start measuring overall usage, engagement, and retention on platform, not per-surface.** If we can deliver a good experience, then every MFK/YTK DAV is more likely to eventually become a teen on our platform, NOT on TikTok.

Commented [1]: Need a punchier bottom line

Commented [2]: Per Nitin feedback, is there any data we can use as evidence to support this? Might seem obvious, but might also be good to help sell the case to Leadership/others who ask.

Gaps in current product offerings

- We need to look at all the different pathways for a first-time user to get started (on MFK). Identify all the places where we are losing users, starting at the top of the funnel.
 - They aren't even getting started on YTK b/c it's too hard to get started (this is our biggest gap).
 - Separate app is naturally harder to get users to adopt, vs the easier path of just watching on YT directly
 - Long parent onboarding/setup flow in YTK, vs just watching MFK on YT with no onboarding

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- **GAP: Need easier process to get younger kids into a managed YT experience (across surface, identity, onboarding).** (project formerly known as "YTK.Next")
- YTK feature/corpus gaps aren't compelling to 5-8s, who want to watch NMFK (which we can work on, but not at a scale where we won't have see impacts to our safety metrics in YTK).
 - **GAP: Need to ensure a younger kid surface has the content they want to watch.**
- Once they are done with YTK, we aren't graduating them into SupeX. Even if we did, it's too hard to get started there as well - parents must go through the setup process of creating a Unicorn account for them.
 - **GAP: Need to identify when younger kids are ready for the next experience and graduate them into it**
 - **GAP: Need easier way to get into SupeX experience - that isn't tied to Unicorn accounts.**
- SupeX has good content coverage, but it is also missing features that tweens want, like creation/commenting/social/etc - we're working on this gap.
 - **GAP (already in progress): Enable tweens to have social experiences, create, etc, responsibly.**
- Overall tween->teen graduation strategy not well defined. SupeX is a product for protective parents of tweens, and we have no corresponding teen product to graduate them into. Our only teen offering today (and the only one confirmed on our roadmap) is making the unsupervised teen experience good.
 - **GAP: Need a supervised teen experience that is developmentally appropriate for this age group.**

Options to Address

Summary of Gaps above:

Gap	Priority	Status
Need easier process to get younger kids into a managed YT experience	P0	Strategy WIP (formerly known as YTK.next)
Need to ensure a younger kid surface has the content they want to watch	P0	Project Treehouse proposal under review for current YTK
Need to identify when younger kids are ready for the next experience and graduate them into it	P0	Not yet planned
Need easier way to get into SupeX experience - that isn't tied to Unicorn accounts	P0	Not yet planned

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Enable tweens to have social experiences, create, etc, responsibly	P1	Youth Creation / Comments WIP by SupeX team
Need a supervised teen experience that is developmentally appropriate for this age group	P2	Not yet planned - team focused on core teen experience first

- **Key problem to solve: We need to shepherd families “across the gulf” from watching anonymously on YT, into managed experience(s), and have kids emerge as teens/adults on the platform.**
 - To get there, we need something on Main. Asking users to migrate to a separate app with heavy identity/onboarding and overly restricted corpus/features will only lead to losing these users, as we see today.

Options

1. **Create a new destination on Main that families can use.** This could be (lightweight) identity-based (create a profile for your child to keep watching) or could be in the form of a toggle (rebranded Restricted Mode?).
 - a. An experience that automatically ages up with the child, and serves more and more appropriate/relevant content. “YT is the parent” in this experience.
 - b. In this option, our current solutions would still serve an important purpose, as safer options for parents that want a more gated experience. Alternately, if kids get too sophisticated for YTK, parents can put them back in the broader destination.
2. **Evolve YTK into this new experience on Main for younger kids.** Families watching MFK would have a much easier way of providing an age-appropriate experience for kids, and they could graduate into SupeX (already on Main) when ready.
 - a. Requires us to be willing to rethink the YTK content experience / policy-safety bar to maximize appeal
 - b. Also needed - lighter-weight ways to get into YTK. Early thinking already underway here as part of “YTK.Next.”

How to measure success

- tbd

Open Questions

- What do we change / what does the product roadmap look like for next year?
- How can we calculate youth LTV across the platform, potentially by age group (kids, tweens, teens)?

Resources

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[HYPERLINK

"https://docs.google.com

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Suggested Next steps

1. Determine working group - Tanaya, Lindsay, [REDACTED] [REDACTED] [REDACTED] [REDACTED] Matt, [REDACTED]
[REDACTED]
 - a. Kickoff meeting with working group week of Nov 28
 - b. Weekly syncs w working group
2. Develop timeline and define milestones
 - a. Youth Leads 12/7 or 12/14
3. Reach out to Lindsay/Josh/DS - find out what age each tier of users (i.e. U13) leave YT for TikTok
4. Reach out to Tanaya, [REDACTED] - Buy data from e-marketer ([HYPERLINK
"https://www.tubefilter.com/2022/03/09/youtube-tiktok-statistics-emarketer/" \h]) and parse through it

DOCUMENT SLIPSHEET

Bates Number: GOOG-3047MDL-01735688-GOOG-3047MDL-01735692

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