

## **AMENDED Exhibit 742**

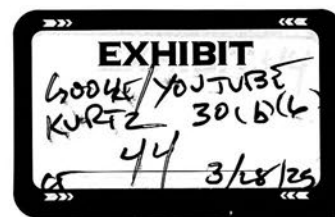
# **PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

## Produced in Native



# Product: The Case for YouTube In Schools via GSuite For EDU

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## Why this matters

It's the right thing to do for our users and partners

- Users
  - Teachers seek out YT because video is a critical resource for professional development, teaching aid, and project work
  - Students turn to YT every day to supplement their learning
  - We need a product that works for them
- Partners
  - Schools are a top priority for content creators, aligned with their vision, and they even license their content already to get it into schools

Larger business context

- Internal:
  - One of YouTube's core values is access to information, so we should be useful in one of the most iconic information gathering spaces
  - Google is investing strongly in schools and has made a commitment to education. YT has made learning at top 5 priority but has not invested in schools
  - Google will amplify what we do in schools across product, marketing, and sales (GSuite, EDU marketing, Hardware - chromebooks etc)
- Ecosystem:
  - Our competitors are investing strongly in schools: apple, msft, facebook, amazon
- Policy:
  - YouTube's commitment to Learning must resonate in the place people associate with learning: schools
- Opportunity:
  - Robust paid content market for edu content delivery
  - Pipeline of future users (google edu / cloud) biz model for enterprise
  - Pipeline of future creators (making as a project versus an instagram story) or potential for future innovation [weak]

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## Understanding the problem in schools

- US teachers were asked in 2017 ([REDACTED] whether they and students were allowed to use YT at school:  
26% did not know 9% said blocked entirely 17% said teachers only 22% said yes (unfiltered)\*
- An assessment of some of the challenges:  
26% said yes but filtered

| Challenges                      | P0                                    |                                                  |                                                      | P1                                                             |                                                            |                                                                     | P2                                                            |
|---------------------------------|---------------------------------------|--------------------------------------------------|------------------------------------------------------|----------------------------------------------------------------|------------------------------------------------------------|---------------------------------------------------------------------|---------------------------------------------------------------|
|                                 | Student Privacy: collection of data   | Discomfort with advertising                      | Fears of inappropriate content                       | YouTube is distracting (suggested and recs)                    | S&D Challenges (hard to find the accurate/best content)    | Bandwidth Constraints /Inconsistent Wifi                            | Content Gaps?                                                 |
| Existing Solutions or Resources | YTK addresses COPPA / No-Cookie Embed | YT RED / YT Gov Embed / YTK has manual ad review | YTK (and YTK corpus) / MRM (and YTM Restricted Mode) | N/A but insights from Well Being & Learning visioning projects | Rich metadata from over X# YT videos assigned in Classroom | Relay Point (hard drive) / Accelerator (fka spacecast) / YouTube Go | Might be solved by curation, but if not then Content Partners |

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YouTube

\* the remainder were yt is filtered; NB: for Middle School and High School Teachers, the % blocked was 11% and 8%, respectively, the % teacher-only was

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

| Knowns & Unknowns                                                                                                                                                                                                                                                                                                                                            |                                   | Potential Solution Pathways                                                                                                                              |                                                                                                                                                         |                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
| <b>Problems that must be solved</b>                                                                                                                                                                                                                                                                                                                          | <b>Understanding Problems</b>     | <b>New YT Experience</b><br>A very simplified instance of YouTube with minimal feature set                                                               | <b>Web-Version YTK</b><br>A renamed version with some new additions as a core service for schools                                                       | <b>Adapted YouTube</b><br>A toggle that applies when YouTube is accessed from within G Suite for EDU             |
| Privacy of student data                                                                                                                                                                                                                                                                                                                                      | GCS quant survey                  | <b>Addressing Problems</b>                                                                                                                               |                                                                                                                                                         |                                                                                                                  |
| Ads-free experience                                                                                                                                                                                                                                                                                                                                          |                                   | Strongest in terms of safety with regard to both privacy and content; easiest to turn off ads                                                            | Strong in terms of content safety, half way there in terms privacy, partially there in terms of turning off ads                                         | Hardest on all fronts, especially data. Turning off ads problematic across                                       |
| Appropriate content filtering                                                                                                                                                                                                                                                                                                                                |                                   | <b>Providing Features</b>                                                                                                                                |                                                                                                                                                         |                                                                                                                  |
| <b>Critical Feature Set</b>                                                                                                                                                                                                                                                                                                                                  | <b>Understanding Feature Opps</b> | Path of least resistance into G Suite; distractions easily eliminated without YT features; but teacher-centric model is middle of the road w/o YT search | Easiest existing YT product to move toward G Suite, but needs for feature addition is very high, especially teacher experience and distraction aversion | Most robust offering in terms of teacher accessibility, but biggest lift on G Suite integration and distractions |
| G Suite Integration & Identity                                                                                                                                                                                                                                                                                                                               | UX Research with Google EDU       | <b>Pros and Cons</b>                                                                                                                                     |                                                                                                                                                         |                                                                                                                  |
| Teacher-centric UX & curation                                                                                                                                                                                                                                                                                                                                |                                   | + build it right from the start; flexibility and speed<br>- smaller corpus, YT search integration questionable                                           | + Algo potential of YTK<br>- the move from Kids to Educational content filters                                                                          | + all of YT, suited for schools<br>- all of YT, needing retrofitting                                             |
| Reduce distractions                                                                                                                                                                                                                                                                                                                                          |                                   | <b>Costs</b>                                                                                                                                             |                                                                                                                                                         |                                                                                                                  |
| <b>Potential Business Models</b>                                                                                                                                                                                                                                                                                                                             |                                   | Starting from scratch eng<br>Need to sign deals for content licensing<br><br>20 eng hc estimate, \$opex/cac                                              | Need to launch web version of YTK and then re-skin as Schools-version<br>Content play needs attention<br>Minimum 10 eng hc \$opex/cac                   | Highest cost, most data storage issues,<br>Eng headcount very high<br>\$opex/cac                                 |
| <b>Revenue Model and Size of Opportunity</b>                                                                                                                                                                                                                                                                                                                 |                                   |                                                                                                                                                          |                                                                                                                                                         |                                                                                                                  |
| <b>Philanthropic:</b> cover YT + content costs from .org other impact entity<br>- Cost basis, no upside<br><b>Freemium:</b> some library free, full library and features/caching product<br>- Free and then \$xyz/building * schools<br><b>Subscription:</b> paid SKU via Google for EDU enterprise sales<br>- \$xyz/building * schools, \$500M+ marketplace |                                   |                                                                                                                                                          |                                                                                                                                                         |                                                                                                                  |

## Recommendation

[to be replaced]

Complete the 2 pager process:

- Substantiate claims and collect critical updated information
  - UXr Research
  - Quant Research
- Craft a narrative to encourage investment and a deeper investigation
- XFN engagement
  - Legal
  - Google EDU team support
    - Product costs
    - Business opportunity

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You Tube

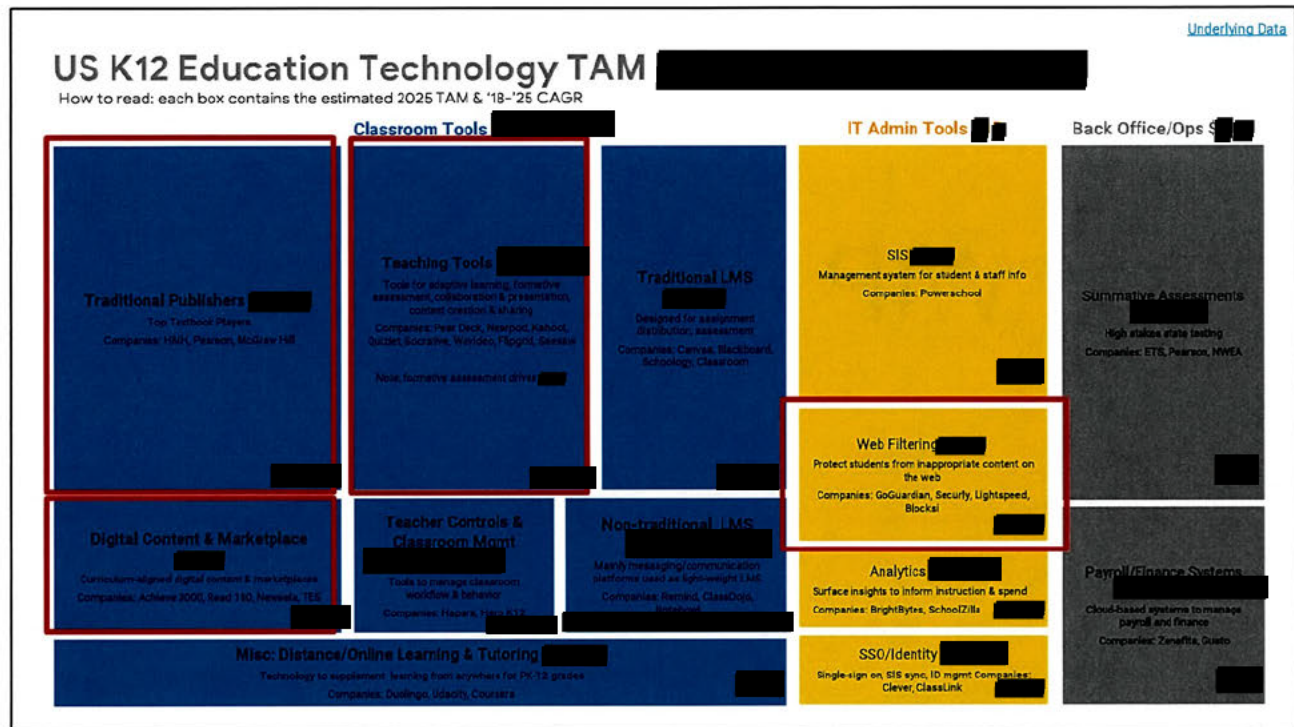
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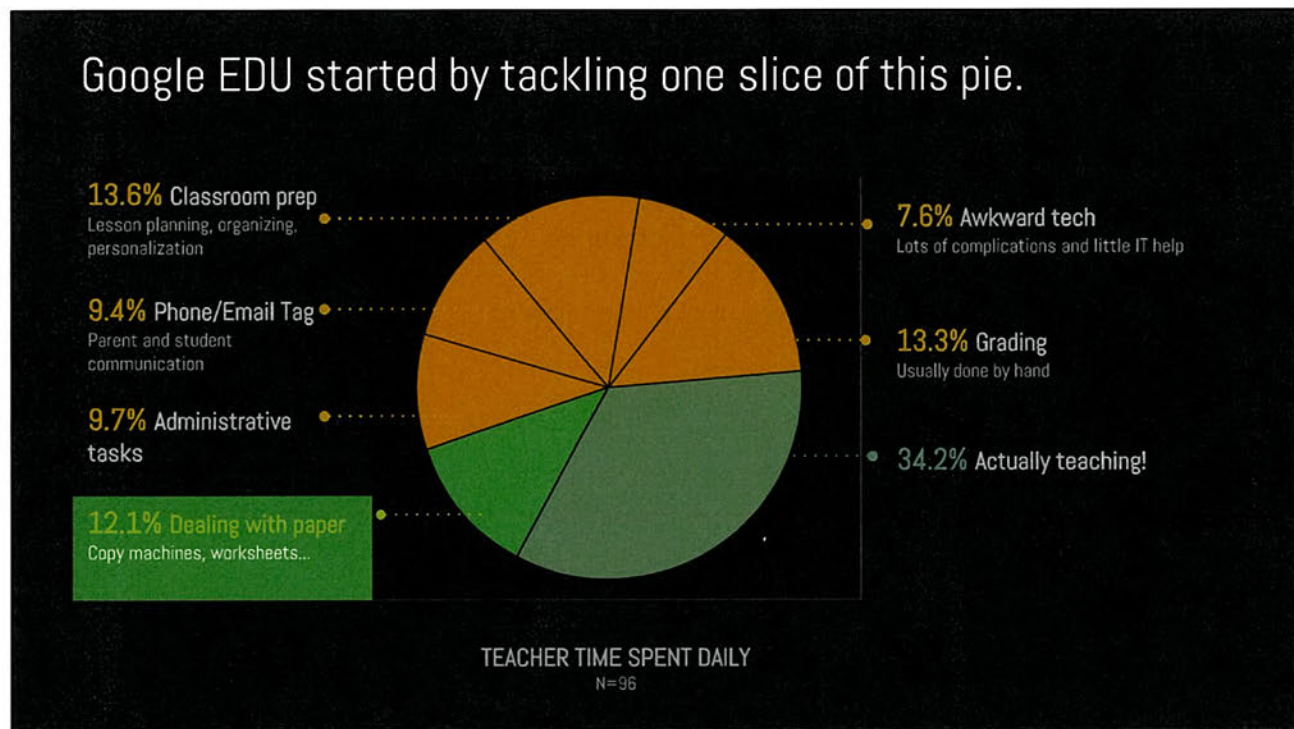
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# WIP - Appendix

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- We started with this one problem -- put Google front and center in ed-tech
- We wanted to build a foundation, on which we could do really incredible things -- (1) to get Google into hands of kids, (2) transform education

**Want more pain? Here's more pain**

• [REDACTED]  
• [REDACTED]

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You Tube

## Potential Solutions

-  Adapted Web Version of YTK safe backend
- Paid SKU (freemium + paid)
- Player for Learners (3rd party embed-only experience)
- YouTube for Teachers (new url or web app for curation of edutubers)
- Cloud-built player with YT Content
- ***Cross-cutting every solution***
  - GSuite Integration
  - Enabling identity

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## Costs & Benefits, Proposal #1: Adapted Web Version of YTK

*Solution Overview: This no-cookie version of YTK, built on the web, could be renamed as a YT for schools product. With the most progress toward solution of any existing product/feature, this presents the least paths of resistance. This would likely be an unpaid product and 100% loss for YT.*

### Addressing the Need:

Privacy:

Ads:

Quality:

S&D:

Bandwidth:

Content:

### Cost & Time to Deliver:

#### Major Costs:

- Integration into G Suite
- Enabling identity
- Content/agreements

#### Timeline:

Unknowns/Outstanding ?'s:

### Revenue Opportunity:

#### Market Size:

#### Paid Features/Price:

- \$0

Unknowns/Outstanding ?'s:

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YouTube

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## Costs & Benefits, Proposal #2: Paid SKU

*Solution Overview: a freemium model for teachers and students to use with one corpus of content and experience would be available to all. A robust version would be sold via G Suite at the enterprise level to nations, states, and districts*

### Addressing the Need:

Privacy:

Ads:

Quality:

S&D:

Bandwidth:

Content:

### Cost & Time to Deliver:

Major Costs:

- Integration into G Suite
- Enabling identity

Timeline:

Unknowns/Outstanding ?'s:

### Revenue Opportunity:

Market Size:

Paid Features/Price:

Unknowns/Outstanding ?'s:

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## Costs & Benefits, Proposal #3: Player for Learners

*Solution Overview: this 3rd-party supported embed-only experience will be built on the no-cookie embed player. The solution mirrors Player for Publishers, but in a way that opens up options for 3rd parties to engage more deeply in solving the problem of user experience.*

### Addressing the Need:

Privacy:

Ads:

Quality:

S&D:

Bandwidth:

Content:

### Cost & Time to Deliver:

Major Costs:

- Integration into G Suite
- Enabling identity

Timeline:

Unknowns/Outstanding ?'s:

### Revenue Opportunity:

Market Size:

Paid Features/Price:

Unknowns/Outstanding ?'s:

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## Costs & Benefits, Proposal #4: YouTube for Teachers

Solution Overview: *this would be a new url or an app, designed by and for teachers, for the curation of top edutuber content*

### Addressing the Need:

Privacy:

Ads:

Quality:

S&D:

Bandwidth:

Content:

### Cost & Time to Deliver:

Major Costs:

- Integration into G Suite
- Enabling Identity

Timeline:

Unknowns/Outstanding ?'s:

### Revenue Opportunity:

Market Size:

Paid Features/Price:

Unknowns/Outstanding ?'s:

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## [Cost & Benefits Template] Proposal #[x]: [Name]

Solution Overview:

### Addressing the Need:

Privacy:

Ads:

Quality:

S&D:

Bandwidth:

Content:

### Cost & Time to Deliver:

Major Costs:

- Integration into G Suite
- Enabling identity

Timeline:

Unknowns/Outstanding ?'s:

### Revenue Opportunity:

Market Size:

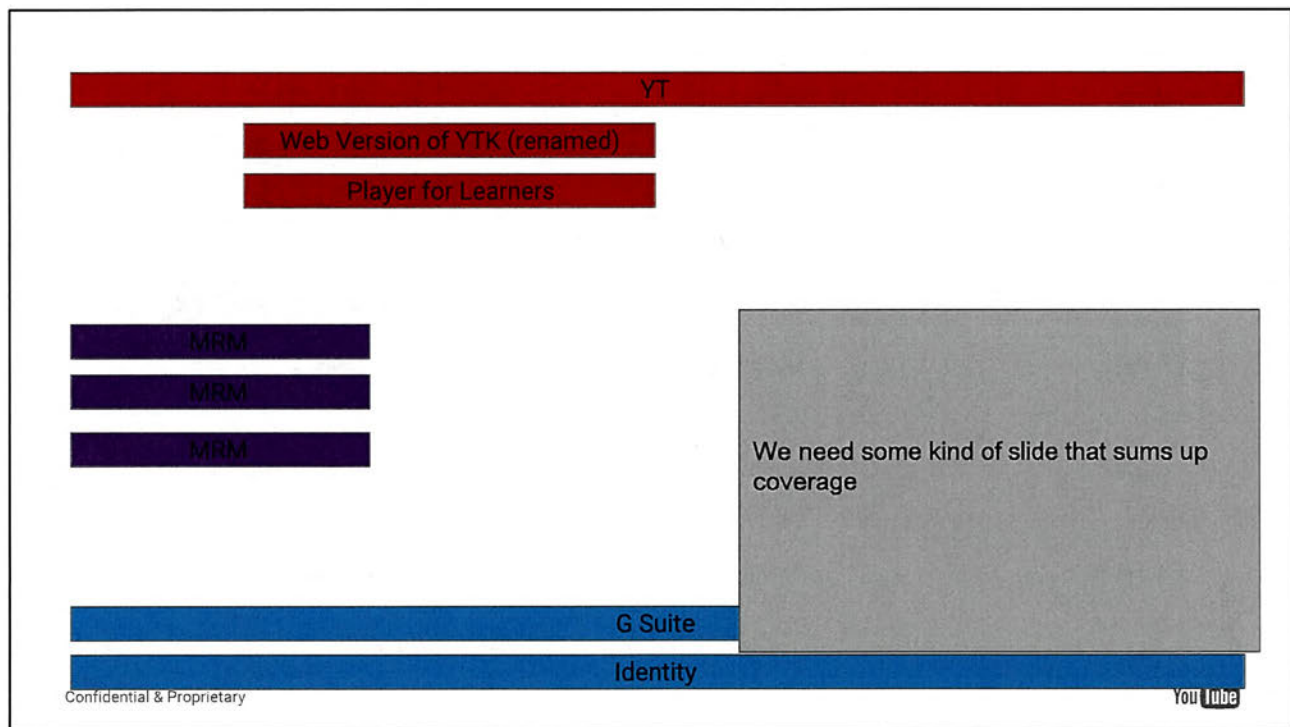
Paid Features/Price:

Unknowns/Outstanding ?'s:

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You Tube

<https://docs.google.com>



## What you need to know - eng

Leave out bandwidth and content for the eng side of things, keep the other 4:

Privacy, ads, quality, S&D

Why can't you....

- Do this on YTK?
  - What breaks if we make a kid a student and make a parent a teacher (on a web version)

This makes me think that making YTK web embed (or PFL w/ no cookie) work for just google classroom....or another specific embed site...but we need an identity handshake

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