

AMENDED Exhibit 758

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





G Suite for Education

YouTube Product Review - 12.12.18

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Google Cloud

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Goal

Create shared understanding of G Suite for EDU efforts, and how YouTube fits in.

Agenda

- Recap of recent GSFE incident
- G Suite for EDU (GSFE)
 - 2018 overview and 2019 strategy
- YouTube in schools: early work and scoping
- *Not covered today:*
 - *YouTube learning foundation work (courses, learning grants)*

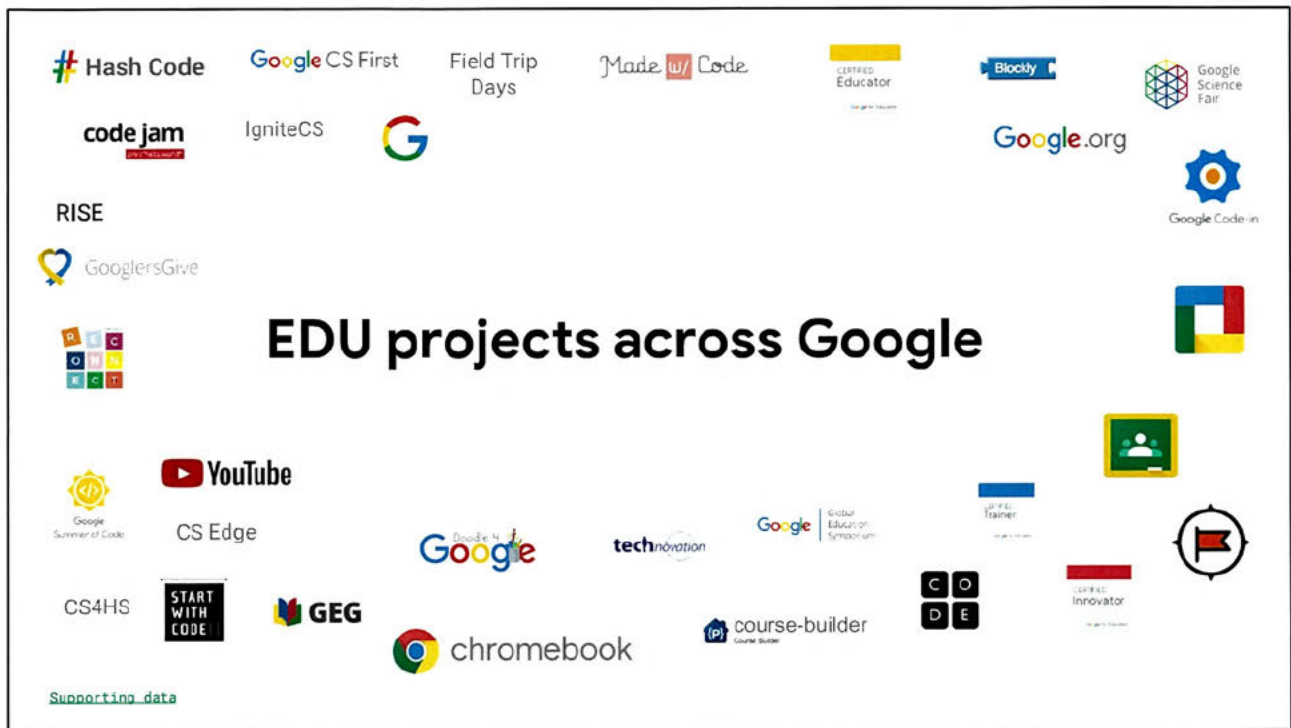
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G Suite for EDU

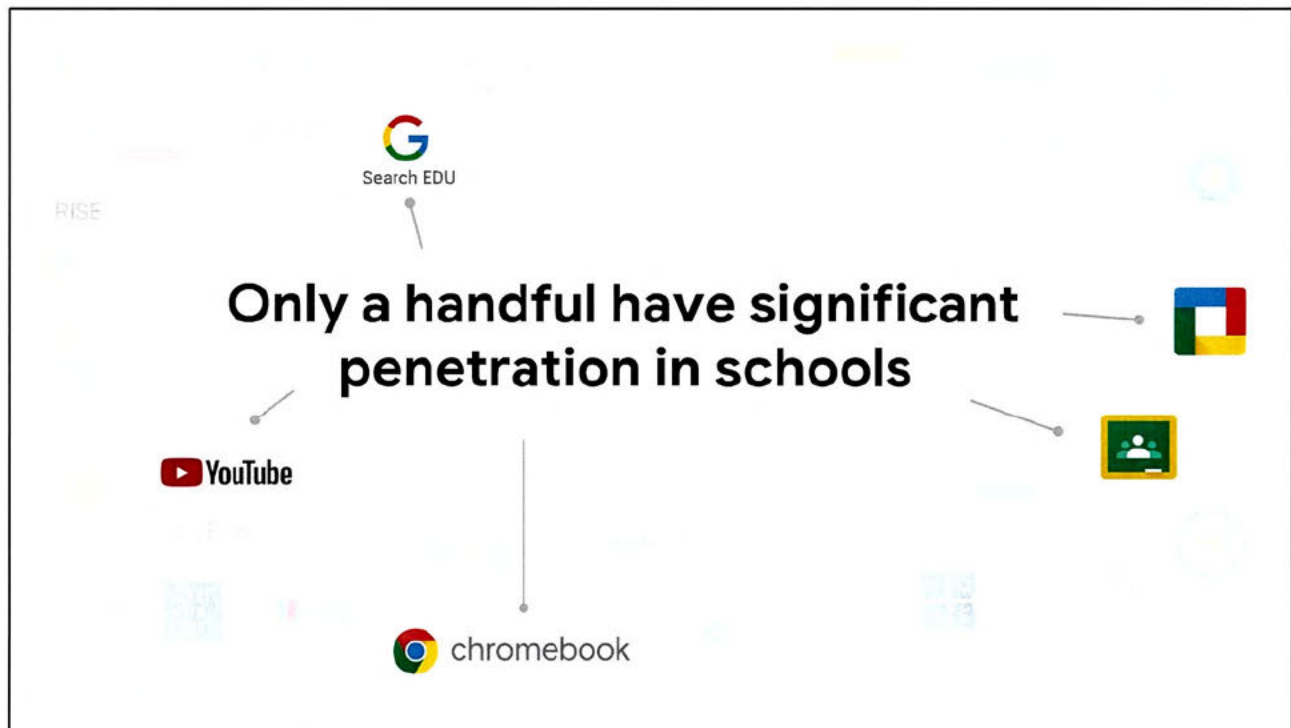
Overview and Strategy



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- What you'll hear today is just the tip of the EDU iceberg. There are dozens of education projects across Google -- across product PAs, programs for CS education and universities, and more than [REDACTED] in philanthropy to educational nonprofits through google.org
- But given limited time, today we're going to focus in on recent G Suite updates, and we're hoping to do a broader overview of EDU across Google at a future TGIF.



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YouTube isn't safe, often blocked in schools



YouTube isn't safe for students, so it's blocked in schools

No way to block unsafe content, comments, ads. █ of US K12 schools block YouTube

"I don't like my students going to YouTube and seeing all the comments and ads and related videos."

"The parents in my very rural school district are upset with student access to YouTube."



Efforts to make YouTube safe for schools have yet to work

Restricted Mode doesn't work like it's supposed to, YouTube for Schools deprecated in 2015

"YouTube's Restricted Mode has blocked a poem I wrote for a gay friend" "Is YouTube anti-LGBT?"

"With YouTube for Schools going away, I've had to block YouTube access entirely for my students."



YouTube has rich EDU content, but isn't designed for formal learning

Poor discoverability. No options for student interaction, sequencing for progressive learning

"Watching a video on YouTube is no more active or engaging than reading a textbook. And what happens when a high school student is assigned videos from all six of her classes?"

Source: GfE call reports & product forums

Google

From marketing analysis

YouTube in Schools

Implications moving forward



Context of schools in overall learning efforts

-

Not ready for prime time

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Context: G Suite and YT in Schools today

"Core services" meet school compliance and regulatory requirements

- "Core services" meet requirements of legislation like COPPA & FERPA
- Includes items like not tracking location, no targeted advertising
- Google's existing core services: G Suite for Education, Chromebooks (including Chrome Sync)



YouTube is currently an "additional service"

- YouTube "off" by default (off = no sign-in)
- "Managed Restricted Mode" (MRM) provides basic content filtering but has gaps
- Contextual ads still served, and removing ads is difficult as creators rely on m10n
- No admin support

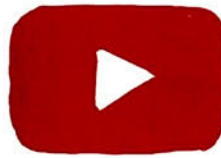


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YouTube videos are commonly shared via Classroom

Top 10 channels (>50k Classroom shares each)

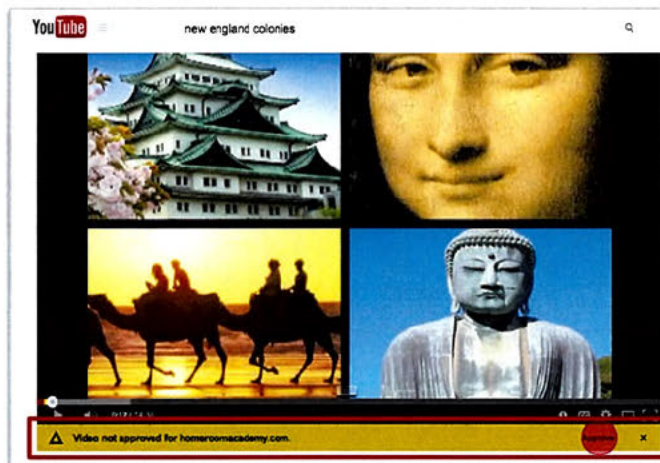
- CrashCourse
- Khan Academy
- TED-Ed
- Amoeba Sisters
- Bozeman Science
- mathantics
- Senor Jordan
- TEDx Talks
- Tyler DeWitt
- CrashCourse Kids



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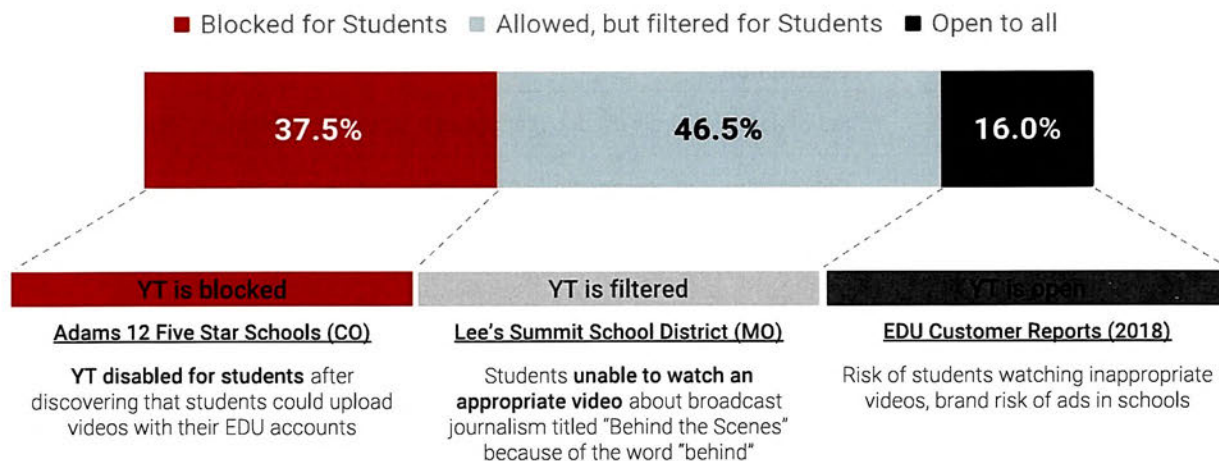
Managed Restricted Mode (MRM) used by [REDACTED] K12 G-Suite EDU users... but unsupported

- Launched in 2015 (original YTPR [deck](#)), [REDACTED] now have MRM enabled [REDACTED]
- **Many of the largest K12 districts in the US are on MRM:** (eg: LA Unified - 285k, Clark County, Vegas - 248k)
- In "maintenance mode", but **major regressions in prod not being prioritized** ([bug](#) filed 8 months ago), even when they affect major YT creators (eg: code.org)
- No support to close [remaining product gaps](#)



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Overall, most US K12 schools still filter or block YouTube



Source: [Google Consumer Survey](#) of 1,500 respondents self-identifying as teachers re: status of YT in their schools

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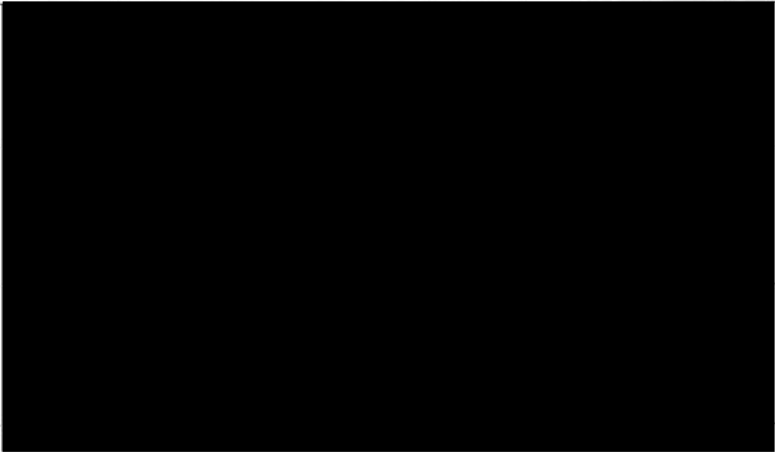
A robust YT product for EDU needs 4 key features

Feature category	Description
Enterprise management	Set of admin controls used to manage users, devices, content, and features
Safe, relevant content	Robust corpus of appropriate and credible academic content
Ads-free viewing	No ads, which can be distracting to learning (at a minimum, no targeted ads)
Policy compliance	COPPA, FERPA, collection and usage of user data only used to run the service

Creators need us to solve this so they can be in schools

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There are various options that address different problems

	Enterprise Mgmt	Safe, relevant content	Ads-free viewing	Policy compliance	PM/Eng effort
Status quo / do nothing <i>YT in G Suite with poorly supported MRM</i>					
Improve MRM <i>Properly maintain our existing product</i>					
"YT for EDU" <i>Build separate instance of YT fully tailored for schools</i>					

Back to that venn diagram...
What would it be for YouTube EDU?



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