

AMENDED Exhibit 76

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

IG Mental Well-being

Multi-half Strategy

[A/C Priv] • WB Leads Review • 17 Nov 2022

Objectives

Goals

1. Align on overall approach to IG Mental Well-being
2. Align on strategy for PU & proposed priorities
3. Discuss prioritization of understand work for creator burnout

Non goals

Design & Measurement feedback

Executive summary

1. Teen Problematic Use (PU) will continue to be Mental Well-being team's priority over next two halves

Based on research, Meta priorities, our strengths and external narrative, execution on PU will be the focus. We propose:

(1) Improving existing products like Take a Break that show strong retention and making Quiet Mode more robust

(2) Building new products where we have gaps (Frequent Use, late night passive use) & investing in solutions meant to create awareness of behaviors or attentiveness in the moment

(3) Partnering with Marketing and leveraging creator partnerships to influence teen adoption

1. Creator burnout is often bubbling up as a top problem that could be an extension of PU and worth understanding

Next half, we'd like to prioritize research & design vision around creator burnout given our expertise in mental well-being & PU and overall priority of creators for IG. This will establish a strong runway for the team in addition to PU for teens.

Moving fast can help position IG as industry-leading in the space.

Slide 3

- 2 I encourage the team to think about a framework for the broader Creator Mental Well-being space for understand work over the long term. As an example, Creators have expressed anxiety at roundtables and 1:1 interviews. cc [REDACTED] [REDACTED]
_Assigned to [REDACTED]
Sayed Otari, 11/17/2022
- 1 Part of understanding in this space should also include developing an understanding of the competitive landscape cc [REDACTED] [REDACTED]
_Assigned to [REDACTED]
Sayed Otari, 11/17/2022
- 1 What's the team's take on scaling these up to a gen-pop adoption strategy as a more holistic approach to the topic of MWB? Is this planned in the 2 yr strategy? Is scaling to gen-pop (where applicable) generally a part of the 2-yr strategy?
[REDACTED] 11/17/2022
- 1 [REDACTED] all our controls (take a break, daily limit, quiet mode) are available to gen pop while the upsells are limited to teens. Would be good to discuss how focusing on non-teen MWB and corresponding gains/ecosystem impact align with the team's and IG's broader goals.
[REDACTED] 11/17/2022

Background

Mental Well-being & Problematic Use

Framing

Context

Vision for IG is to be “a video and messaging first platform that wins with teens and creators.”

However, IG plays a key role in young people’s mental well-being that can affect their usage of the app—both if and how they use it.

Vision for IG Mental Well-being

Our team helps IG acknowledge, understand, and proactively address its role in teen mental well-being.

When we’ve succeeded, IG continues to be a safe space for teens to actively engage with their community and feel good about the time they spend on the app.

Purpose Statement

The IG Mental Well-being team empowers teens with tools and resources to manage their experiences and foster community norms so that they can be more intentional about their time on IG.

Success statement overall is “People have the tools that they need and are empowered to control their time and experiences on our platforms”

Landscape and priorities

- **Execute:** Problematic Use continues to be a top execution opportunity & we have more ground to cover in closing key coverage gaps.
- **Understand:** Creator burnout has emerged as an untapped opportunity for a top priority user segment and is connected to our work on PU

Social comparison previously deprioritized, all other 'below-the-line' areas are being addressed by partner teams.

Priority	Problem Areas	Known user problem on IG	Currently prioritized for IG (X-Meta WB)	Product coverage today	IG MWB well-positioned to address/lead	Aligns with external narrative
Execute + Understand	Problematic use (PU)	●	●	●	●	●
Understand	Creator mental well-being*	●	●	●	●	●
Below-the-line	Social comparison	●	●	●	●	●
	Connections	●	●	●	●	●
	SSI/ED	●	●	●	●	●
	Bullying & harassment	●	●	●	●	●
	Sleep**	●	●	●	●	●

*Creator well-being solution space may overlap with problematic use
 **Sleep partially addressed through problematic use

Slide 6

- 2 To clarify this is the overall MWB landscape combined across top pain points from our own surveys and CWB top priorities. There are other owners for these areas which is why the column "IG MWB well-positioned to address/lead" is Red.
[REDACTED] 11/17/2022
- 3 For clarity here, SSI/ED and B&H are covered problems in other teams on IGWB in 2022/23. What's the context behind their inclusion here? Are there specific dimensions that are not being covered that the team is thinking of?
Sayed Ötari, 11/17/2022
- 3 Any aspects of the existing areas that are below the line? Caveat that its below the line for MWB not IG.
[REDACTED] 11/17/2022

Why PU

PU: A perceived lack of control over usage of a technology or social media platform that is perceived to lead to negative life impact

Top WB issue for IG teens, associated with life interference

56% of IG teens surveyed say it's difficult to manage how much time they spend on social media and 14% say IG makes it worse

Teens and young adults are more likely to report experiencing problematic use, consistent with developmental differences in self-control

Teens say they want help

41% of weekly teen users say they try to limit their IG use and 22% say they want help controlling their usage (Hanko 2022, report forthcoming)

Associated with low value IG sessions and churn

9% of US teen WAU say they have deleted IG in the past to better control their usage; this increases to 18% among teens who report low control over how often they check the app (Hanko 2022, report forthcoming)

Sizing PU

PU behaviors are correlated with each other; we sized them separately because they may point us to unique product solutions.

Based on strength of association, existing product coverage [gaps](#) and sizing, we will prioritize top 3 behaviors in the table.

The top 3 behaviors have a user overlap.

Behaviors associated with PU (listed in decreasing strength of association)	Rough sizing (% of global teen WAU)
Frequent checking ≥20 L7 repeat passive sessions (<10 min from previous)	37% (65M users)
Overall amount of time spent ≥30 min L7 average daily time spent	31% (54M users)
Passive late night use ≥1 passive session 12-4 am in a week	18% (32M users)
Late night use Non-0 late night time spent 12-4 am in a week	36% (63M users)
Frequent checking ≥30 clearing of notifications L7 daily average	42% (74M users)
Frequent checking: Surface switching ≥1 session with 20 surface switches 9 pm - 4 am L7 daily average	35% (61M users)
Content consumption patterns (e.g., long scrolls on single topic)	TBD

Source: [Taking a look at IG Well-Being Problematic Use Heuristics](#)

Behavior references: 1, 2

L7 refers to last 7 days

1. RE: Short sessions <-> repeat passive sessions. The volume short sessions and the number of repeat passive sessions are very highly correlated (0.8 correlation) and repeat passive sessions slightly outperformed short sessions so it is the one that remained.

Competitive benchmarking



IG has a comprehensive list of well-being features but they hard to find and use cases are not explicitly clear (e.g. TAB and Limits). A Mental Well-Being center will enable IG to be more intentional with all of these tools. More targeted contextual and leverage usage propensity models upsells would aid awareness and education



In addition to a Well-being Resource center, TikTok has an in-app Safety center that features a number of Guides including one focused on mental-wellbeing that links out to relevant resources and tips.



YouTube also have a comprehensive in-app Time Watched center, with Take a Break, Bedtime, and weekly stats. YouTube also have controls for Not Interested as well as content flagging on each video.



Twitter's content control tool allows users to control what topics they've seen and remove them. No time spent related controls.

Market landscape

IG's PU efforts are aligned with industry baseline standards, however, to be market-leading we should have a stronger POV by leveraging interventions and/or defaults, and providing more robust insights/resources.

Feature						
Daily usage limits	Yes (opt-in)	Yes (opt-in)	Yes (opt-in)	Yes (opt-in)	No	No
Take a Break	Yes (opt-in)	Yes (opt-in)	No	No (Feed Pause on hold)	No	Yes (opt-in)
Late Night interventions	Coming soon (Quiet Mode)	Yes (silenced notifis for all teens)	Yes (Focus Mode opt-in)	No	No	Yes (opt-in reminder)
Frequent use interventions	Yes (TAB upsell)	Yes (insights)	Yes (insights)	No	No	No (aside from TAB notif)
Time spent insights	Yes	Yes (detailed breakdown)	Yes	Yes	No	Yes

TT late night interventions - Awareness videos
Auto-silenced notifis
Night use insights

- On **TikTok** all teens do not receive notifications at night by default ([more here](#)):
 - 13-15 yrs old - notif muted starting at 9PM
 - 6-17 yrs old - notif muted starting at 10PM
- **Apple** defaults Focus Mode/Do Not Disturb to 10PM - 7AM daily
- **Youtube's** [Bedtime reminders](#) lets you set specific times when you want to get a reminder to stop watching videos and go to bed.
- **Snapchat's** Do Not Disturb allows you to mute certain accounts and stops all notifications from said users or groups.

Slide 10

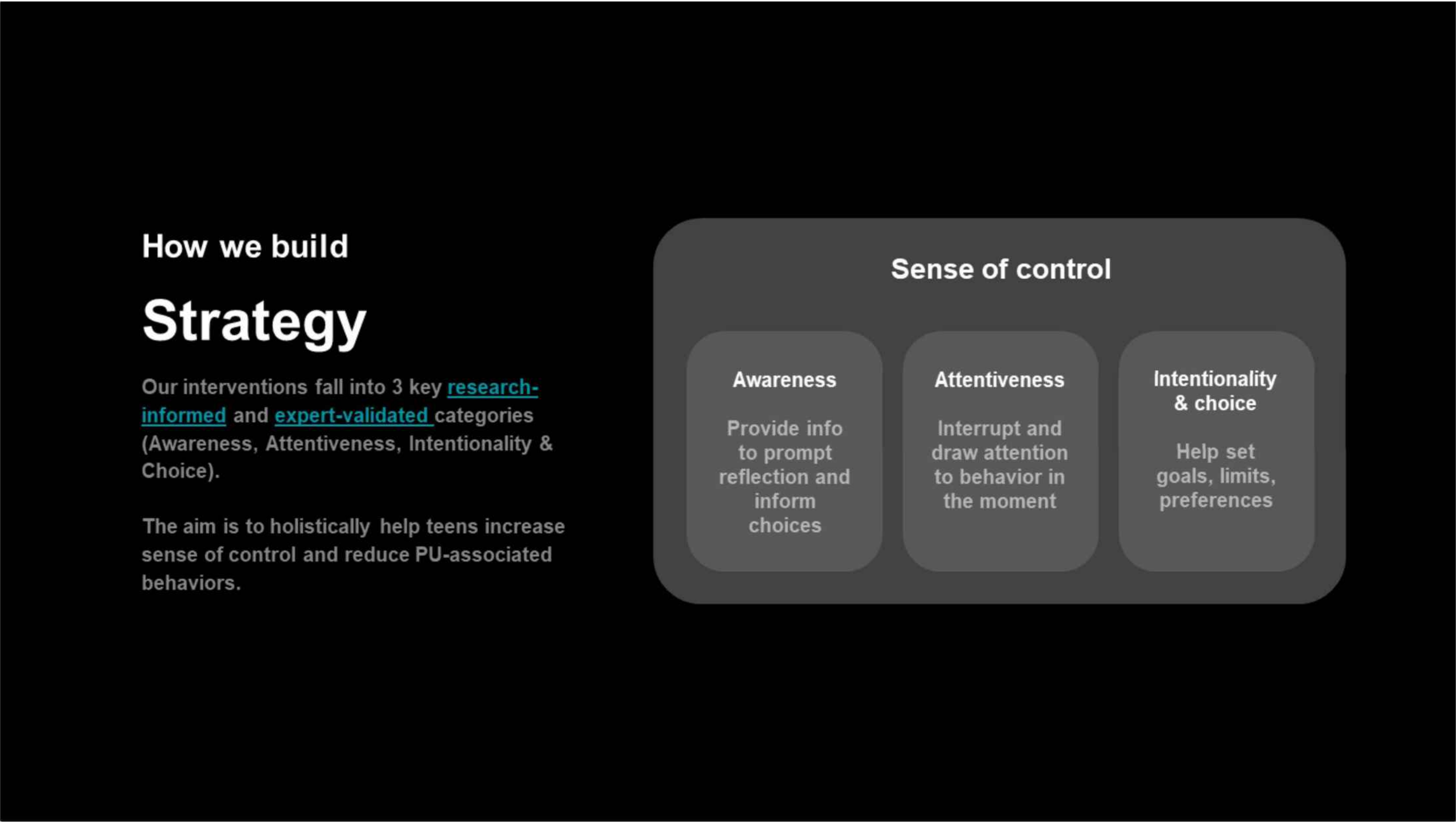
- 4 how do we plan to operationalize lens of relative coverage relative to competitors? how does it tie back to x-meta youth score card
- [REDACTED] 11/17/2022

Strategy

Reduce behaviors of Problematic Use and increase sense of control, by landing a steady drumbeat of expert-backed visible products that support teen well-being

Slide 11

- 4 It would be helpful as part of your strategy to clarify upfront: 1) Competitor analysis and 2) Status and Approach relative to x-Meta Youth scorecard. [REDACTED]
_Reassigned to [REDACTED]
Sayed Otari, 11/17/2022
- 5 Sounds good, we'll elevate this from the appendix to the body.
[REDACTED], 11/17/2022



- :
- Intentionality & Choice (offer intentional choices)
- Attentiveness (draw attention in-the-moment)
- Awareness (increase awareness of their behavior)

Success

Overall success

People have the tools that they need and are empowered to control their time and experiences on our platforms.

North star

Increasing users' sense of control (*pending final alignment*)

Operationalized across

- 1) Meaningful usage (adoption, engagement, retention)
- 2) Behavior change (tool use corresponds with shifts, e.g., reduction, in the relevant behavior target)
- 3) User perception (survey or qualitative feedback on tools being helpful and improving sense of control)

Existing coverage and opportunities

Current products address prioritized PU-related behaviors primarily through intentionality, with room to address:

- 1. Awareness of user behavior, across top behaviors
- 2. Frequent checking
- 3. Late night use (passive)

PRIORITIZED PU-RELATED BEHAVIORS

LEVERS FOR SENSE OF CONTROL

	Awareness Products that give people feedback about their own behavior and experiences on platform.	Attentiveness Products that give information in context - tied to specific behavior.	Intentionality and choice Products that enable behavior change or make change easier.
Frequent checking			Quiet mode
Overall amount of time spent	Your Activity	Daily Limit Take a break	Daily Limit Take a break
Late night use (passive and overall)			Quiet mode
Content consumption patterns (includes long scrolls)		Alternative topic nudge	Multi-hide in Explore, Sensitive content controls, Persistent controls (ie WAIST)

Guiding principles

Empower through controls

We empower teens to be more intentional about their time by creating contextual behavioral awareness and offering relevant controls.

Identify and target teens in need

We use research and expert feedback to generate conviction in our products and target adoption with teens who can benefit most from them.

Drive long-term engagement through well-being

Despite potential near term ecosystem impact, our products aim to create long term retention and engagement by encouraging healthier social media use.

Foster healthy norms

Our products and amplification tools enable creators and teens to set norms around usage habits and influence their communities.

Slide 15

- 2 I love this slide. Wondering where the lens of "foster healthy norms" fits into the 2-year strategy with PU, creator burnout, etc.
[REDACTED] 11/17/2022
- 6 fostering healthy norms is a lens we are taking horizontally across all our products (auto reply/indicators in Quiet Mode and creator content/upsells for products). Based on the success of these initial products, we'd love to go deeper and evaluate more opportunities in this space.
[REDACTED] 11/17/2022

Directional Product Bets

New experiences & Improvements to existing ones

Concepts are illustrative only

AWARENESS OF BEHAVIOR PATTERNS

Time spent: Usage and behavior insights

What: Your Activity improvements for ‘table stakes’ info to support behavior change (i.e. night vs day use, app opens, etc).

Why:

- Teens are bad at estimating time they are spending on social media
- Insights about one’s own behavior are a key part of successful goal-setting and behavior change, and can inform people’s goals ([1](#), [2](#))
- Time management tools are ubiquitous in the competitive landscape for ‘digital well-being,’ thus this is becoming an industry standard



Time Spent notification



Enhanced dashboard
(day vs night insights and app-opens)

Slide 17

- 3 I love this as it relates to empowerment through controls and allowing behavioral awareness.
[REDACTED] 11/16/2022

ATTENTIVENESS IN CONTEXT

Late night passive: Contextual bumpers and resources

What: In-feed units with insights and resources developed in partnership with experts and creators, designed to help people wind down or to nudge them to take a break from scrolling for the night.

Why:

- Experts indicate that providing awareness in context when the behavior is happening is best (vs. out of context, delivering later, or making teens go searching for it)
- We have a coverage gap for late night passive use, exhibited by 18% of teens

SCA

Insights and resources

Insights and nudge

Slide 18

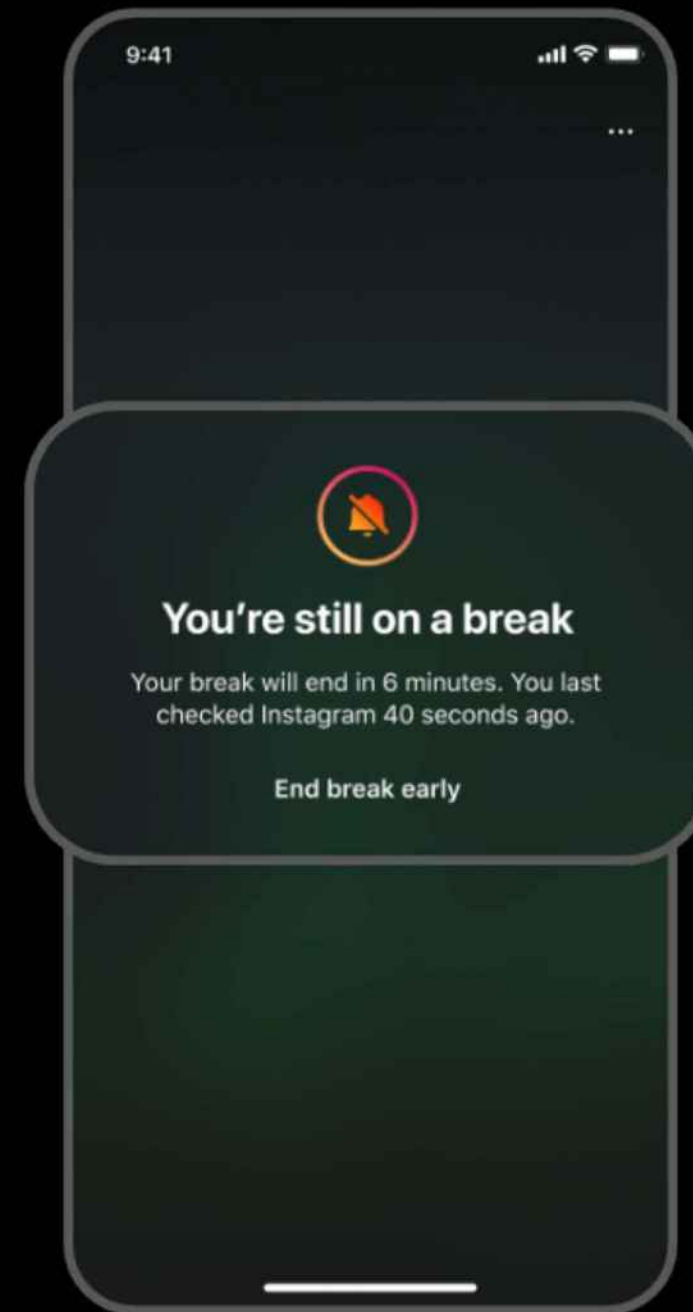
- 1 That would be the experience on the left mock, where we aggregate curated resources from experts/partners/creators and show them to the user during "wind-down hours". It's a concept we are excited about exploring more
[REDACTED] [REDACTED] 11/17/2022
- 1 This is cool, have we explored what an on-platform wind-down experience would look like? We've heard in user research that some users want to use IG to wind down, how might we support that use case while helping the user not lose track of time?
[REDACTED] [REDACTED] 11/17/2022
- 2 Got it-- have we explored a wind down experience that is content agnostic? e.g. sleep timer + auto-play?
[REDACTED] [REDACTED] 11/17/2022

ATTENTIVENESS IN CONTEXT**Frequent Checking: Break duration**

What: Expand Take a Break to support opt-in break duration. Users can set this up to remind themselves when they've reopened the app too soon.

Why: Some teens open the Instagram app automatically and habitually, without intention

- 23% of US teen WAU say they open Instagram without realizing it at least once a day (Hanko, PU foundational survey)
- 27% of teen WAU across 6 countries (UK, US, NG, SK, BR, IN) report 'often' or 'very often' checking IG automatically without realizing it (Davis, PU pilot survey).



Reminder to honor break

INTENTIONALITY & CHOICE

Frequent Checking: Ad-hoc Quiet Mode

What: Expand Quiet Mode to support ad-hoc/temporary needs (ie while driving, studying, etc.) on top of the existing automated scheduling.

Why: FOMO and social pressure are associated with frequent checking

- 42% of US teen WAU with self-reported low control over their IG usage experience FOMO if they don't check IG often (Hanko 2022, report forthcoming)
- 42% are concerned about offending friends if they don't immediately respond to messages - IGD auto reply can help here (Hanko 2022, report forthcoming)

Additional features from partner teams [here](#)

SCA

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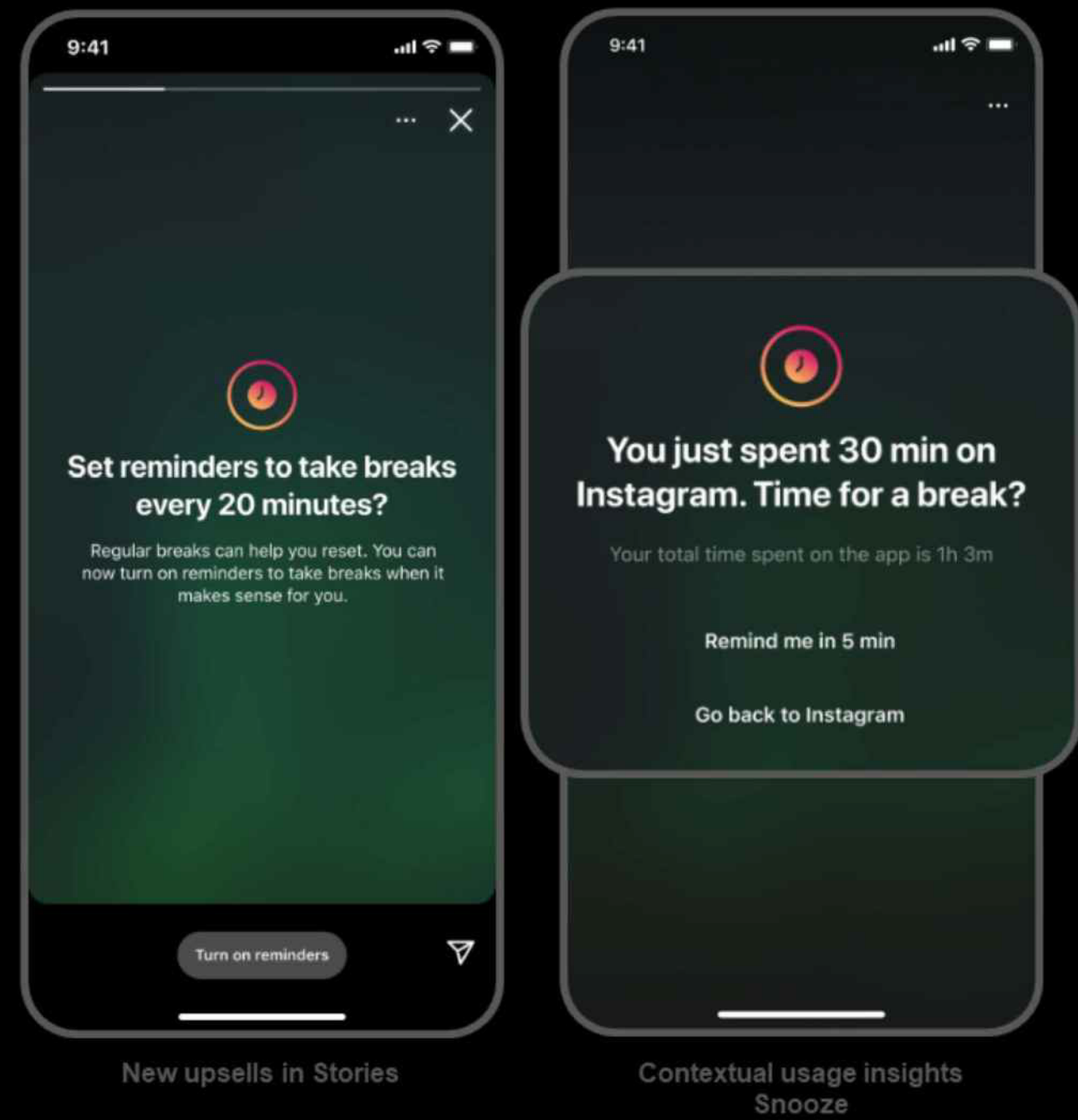
INTENTIONALITY & CHOICE**Time Spent: Take a Break upsells and enhancements****What:**

- Increase adoption through surface expansion for upsells (ie Stories, Reels or Feed), predicted teens, and sessionization
- Increase meaningful use via snooze & new contextual usage insights

Why:

- Strong retention (90% retain the setting, 57% honor reminders WoW, and honor rate for each incremental impression above 12%) ([ref](#))
- Meaningful use at a user level needs improvement (0.2% WAU honor breaks with 8% reminders honored)
- Meaningful use decline driven by a decline in users consistently having 20 min sessions over time ([ref](#))

[Investigation of adoption decline in Q3](#)



~10% of teens who have enabled Take a break have also enabled Daily limit.

[REDACTED] please validate this since this is the first time I am using Daily limit data.

<https://www.internalfb.com/intern/daiquery/workspace/3718692751690760/666599328414993/>

Slide 22

- 7 Opportunities to improve the product experience
[REDACTED] 11/17/2022

INTENTIONALITY & CHOICE

Late Night Use: Quiet Mode Fast Follows

What: Improve product utility of Quiet Mode to make the product more comprehensive:

- Customization by day of week
- Digest improvements that are more indicative of what was missed, and
- Norm setting via public profile indicators

Why:

- Early demand for Quiet Mode is encouraging - 133K teens enabled it (8% of test 1) with an upsell enable rate in the 4-7% range
- Early signs of well-being impact with a stat sig decline in late night time spent (10pm - 7am)

SCA

Increased customization

Improved digests

INTENTIONALITY & CHOICE**Content Consumption: Topic Nudge & Bulk Hide****What:**

- Topic Nudge: Prove out WB impact and effectiveness followed by global expansion
- Bulk hide: Explore discovery options & collab with T&C on positive controls

Why:

- We are in the beginning stages of understanding how content consumption patterns manifests as a form of PU; we're planning research in Q4'22-Q1'23 to understand this better
- 2% of WAU get a Topic Nudge impression per day with a 12-14% CTR and 42% retention WoW. Need to further confirm effectiveness in breaking long chains.
- "Not Interested" control is the #1 ask from Teens.
- T&C is also planning to develop a positive control "Interested" - opportunity to collab for bulk signal

SCA

Pull to refresh with multi-hide

- Pre-launch, Explore bulk hide is used by 0.13% of WAU with 40 mean content hidden (median ■ with Explore bulk hide), vs 10.4 in control

Appendix

FAQs & Additional Insights

FAQ: What caused the Q3 Adoption decline in Take a Break

- We observed a rapid drop in Take a Break meaningful adoption in the second half of September. This has since stabilized.
- Take a Break adoption is heavily reliant on the influx of new users, specifically through the upsell we have in Explore chains.
- The IG ban in Iran impacted us heavily because ~30% of WAU there were seeing our upsell impressions (compared to 3% in the US and 10% in India)
- Upsells on new surfaces should help diversify our channels and lower the reliance on Explore
- Understand work is needed for how the currently enabled users are honoring breaks over time (i.e. why are we so reliant on new users?)

FAQ: How are Take a Break & Daily Limit performing today?

- Both are showing signs of PMF (see retention below); 90% retain the break control once enabled
- We have an opportunity to be more aggressive in driving awareness and adoption of Take a Break
- “Daily Limit” proportion of enabled users getting break reminders is 70% higher than TaB. The amount of enabled users is 40% of TaB, even without any upsells tactics

Product	Awareness	Meaningful Adoption (% of teen WAU)	PMF Retention	Effectiveness
Take a break	37%	0.2% (took a break)	57% honor reminders WoW	Unknown - proper tests needed
Daily Limit	42%	0.05% (took a break)	55% honor reminders WoW	

Funnel	Take a Break (% of Teen WAU)	Daily Limit (% of Teen WAU)
Enabled	2.3%	0.55%
Nudge Displayed	0.5%	0.2%
Honored	0.2%	0.08%

https://docs.google.com/spreadsheets/d/1wVBGmDEV3nfUo8l6Y4e_eOKN0_sXLGnG25e65pcDKBQ/edit#gid=469097209

4.23M tab enabled -> 924K tab displayed -> 370K tab honors

63% Daisy similar results in UK and BR, ref)

Take a Break Retention and Honor Rate

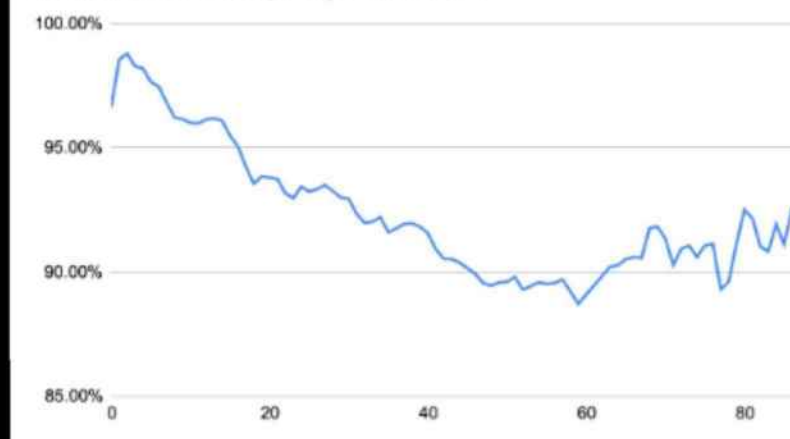
What:

- TaB meaningful adoption had declined from ~0.28% to ~0.19% of teen WAU from August to October 2022. (1)
- The feature has strong retention over time, with reminder set % leveling out around 90% and honor rate around 12.5%.
- However, there is a strong decline in the number of users to see incremental TaB reminders meaning that the decline in adoption is due to decline in impressions as opposed to fatigue.

Why:

- Users do not exhibit long-session behavior consistently over time, which causes the TaB nudge display rate to decline rapidly. (2, 3)
- This means that currently, TaB adoption is dependent on new users enabling the feature and we should explore other exposure opportunities for the feature. (4)
- The drastic decline in number of users exhibiting long-session behavior over time *could* be caused by a lack of sessionization for the TaB nudge.

Reminder Set % by Days Since Set

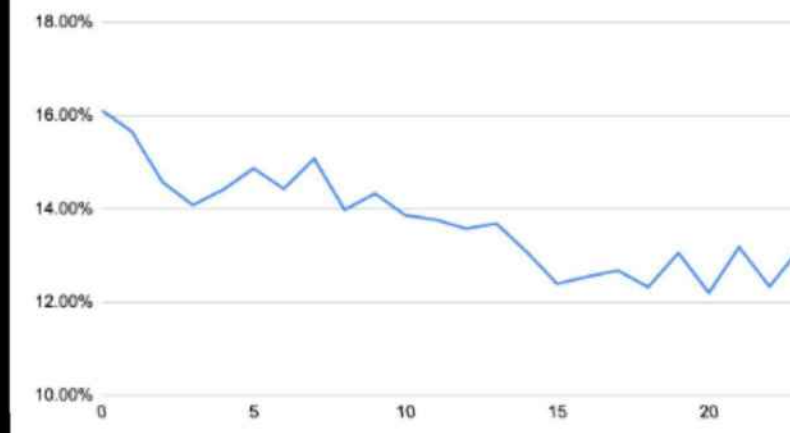


Numerator: # of users with TaB reminder set on day X

Denominator: # of users that had TaB reminder set on day 0

X axis: # of days since user set TaB reminder

Honor Rate by Impression Number

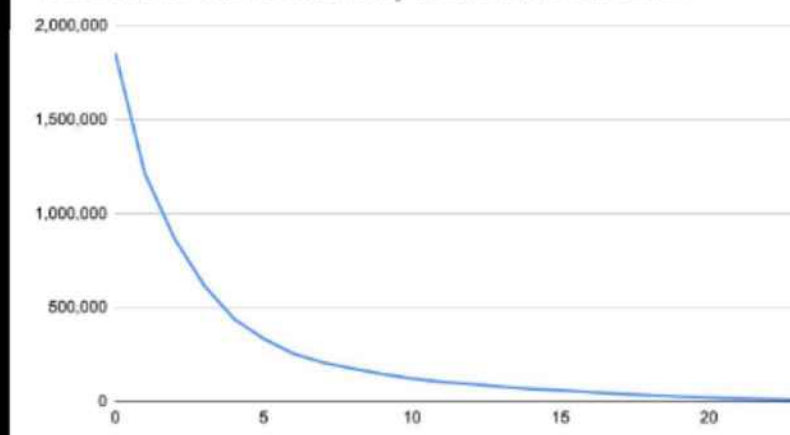


Numerator: # of users who honored TaB reminder X

Denominator: # of users that saw TaB reminder X

X axis: Index of day # that user saw TaB reminder, starting at 0

Users to See TaB Reminder by TaB Reminder Number



Value: # of users to see TaB reminder X

X axis: Index of day # that user saw TaB reminder, starting at 0

FAQ: How are Content Consumption products doing?

We've had a healthy drumbeat and successful collab with T&C + Relevance this half to implement ranking changes, but we have more understand work to do here before claiming success

- Topic Nudge engagement especially WoW retention is promising, but needs more understand work on effectiveness before global roll out
- Bulk hide usage is encouraging - 40 mean content hidden (median 11 with Explore bulk hide), vs 10.4 in control; more data to come post ranking changes
- Daisy: Low organic adoption could be due to low interest or low awareness, but since we don't have strong evidence of improving well-being we shouldn't invest heavily here.

Product	Exposure	CTR	Effectivene ss	PMF (Retention)
Alternative Topic Nudge	2% get impression per day (12- 14% of these click in)	0.16% (clicked on ATN)	No stat sig reduction in high-NAC content consumption	42% clicked on ATN nudge WoW
Explore Not Interested - Bulk Hide	0.13% WAU		Pending cluster demotion	Still not launched
Daisy	Producer grown 0.6% to 1.12%	N/A	TBD	

4.23M tab enabled -> 924K tab displayed -> 370K tab honors

63% Daisy similar results in UK and BR, ref)

- 4.7% of media producers hide like on at least one media per day (2.3X increase from one year ago)
- Viewer control has low organic adoption

FAQ: What do we know about Frequent Checking?

Teens open the Instagram app automatically and habitually, without intention

- 23% of US teen WAU say they open Instagram without realizing it at least once a day (Hanko, PU foundational survey)
- 27% of teen WAU across 6 countries (UK, US, NG, SK, BR, IN) report 'often' or 'very often' checking IG automatically without realizing it (Davis, PU pilot survey).

Notifications make it difficult to manage time spent

- Getting too many minor/irrelevant notifications is a trigger for those with PU; people with PU found it "incredibly difficult to avoid notifications" ([ref](#))
- 21% of US teen WAU say notifications make it harder for them to manage the amount of time they spend on the app, and 32% say the number of notifications they receive can be overwhelming (Hanko, PU foundational survey)

Fear of missing out and social pressure plays a role

- Among teens with self-reported low control over their IG usage:
 - 45% are concerned about missing out if they don't check IG often
 - 42% are concerned about offending friends if they don't respond to messages right away
 - 40% are concerned about offending friends if they don't respond to their posts or stories right away

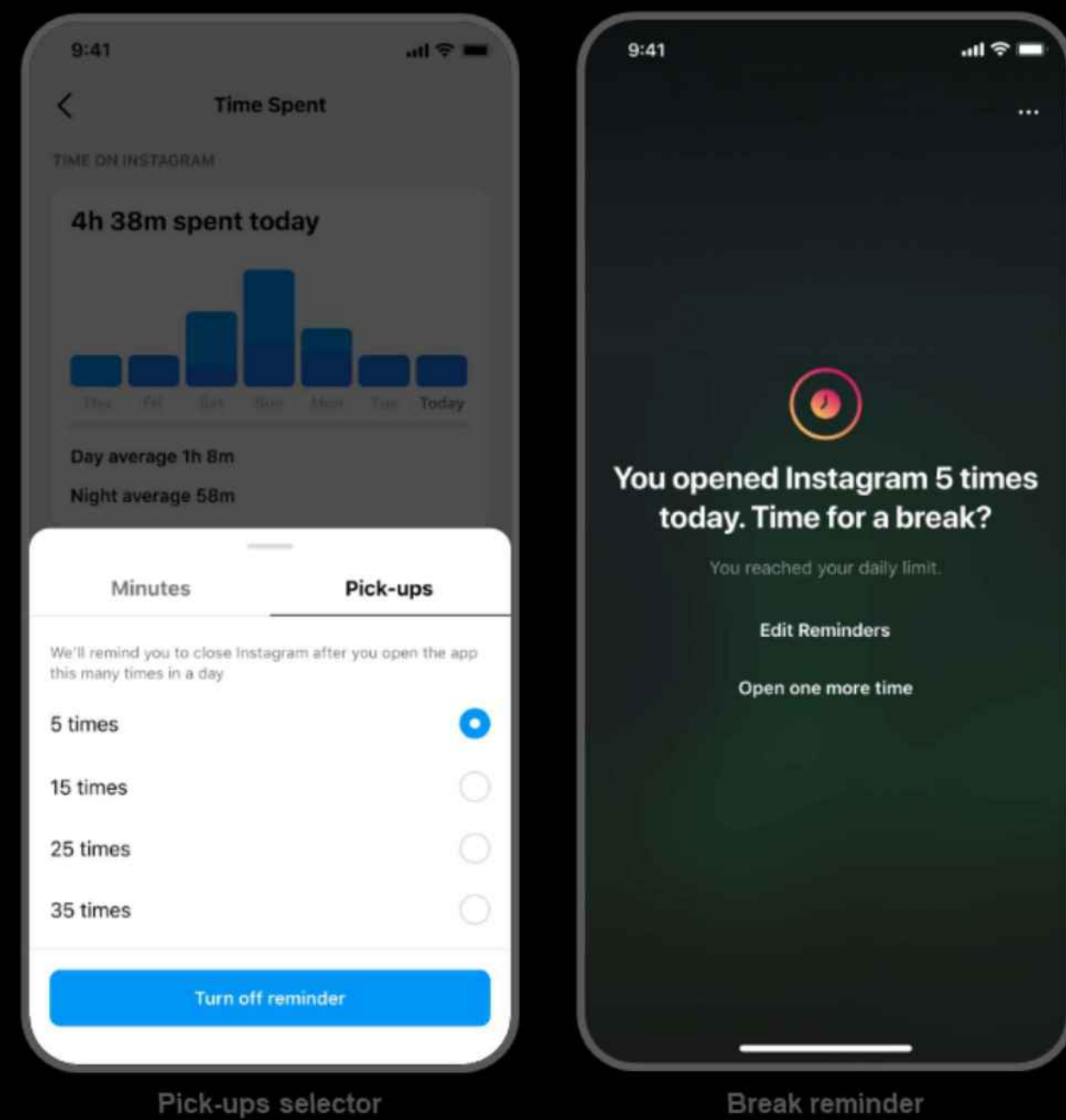
FAQ: Have we considered other interventions specific to Frequent Use?

Insight: Teens may benefit from nudges to interrupt frequent automatic, habitual checking behavior

- *23% of US teen WAU say they open Instagram without realizing it at least once a day¹*

Product Bet: Expand Take a Break to support app-opens

We did not recommend it because we don't yet know if this should be a control vs. a nudge to be most effective and we'd want to test out a few directions to identify what resonates best, especially since direct messaging is major reason for app opens.



Source: 1. PU Foundational Survey, Hunko 2022 (forthcoming)

Heads up you opened the app 10 times

Remove time?

ALT stat: 27% of teen WAU across 6 countries (UK, US, NG, SK, BR, IN) report 'often' or 'very often' checking IG automatically without realizing it (Davis, PU pilot survey).

FAQ: If Notifications drive frequent checking, do we have any product ideas in that space?

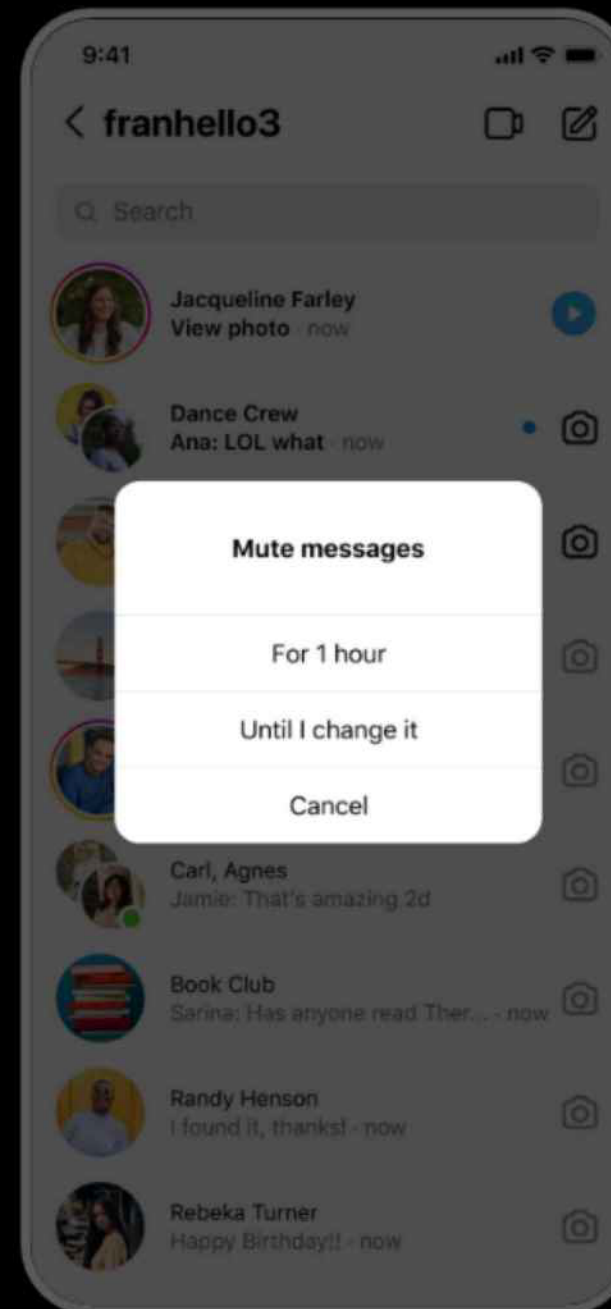
Driven by partner teams

What: IGD and IGNS teams have made progress in building products that help teens have more control over their notifications via batching and muting features.

We plan to measure the WB impact of these features once PU measurement is in place beginning in H2-23

Why: Notifications can make it difficult for teens to manage time spent.

- of US teen WAU say notifications make it harder for them to manage the amount of time they spend on Instagram (Hanko 2022, report forthcoming)



Temp thread muting (testing)



Notifications batching (testing)

FAQ: What could a solution for creator burn out look like?

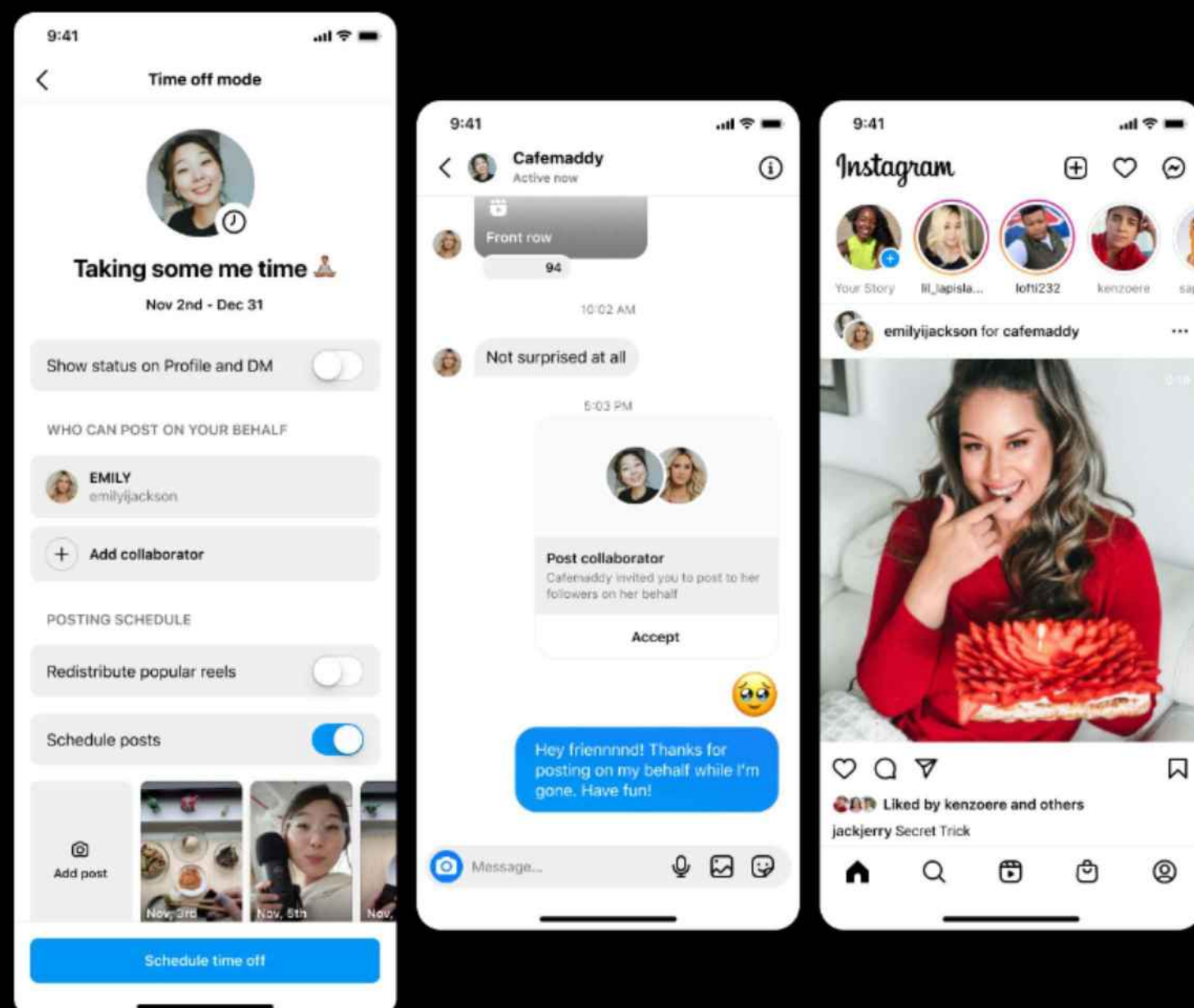
Designs created by Creator Monetization

VISION

Time Off Mode gives creators a more sustainable work life balance

Time off mode tackles the concerns creators have around being forgotten by the algorithm or their fans if they take a break.

We want to give creators the peace of mind to take breaks and when they come back, their reach isn't hurt.



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