

AMENDED Exhibit 768

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

kdDAU ideas - July 2021**Goals:** Grow kdDAU**Approach:**

- Find new users and bring them to youtube
- Get existing users to become more active (kdMAU → kdDAU, kdDAU/kdMAU ratio increases)
- Prevent kdDAU or kdMAU from churning

Scope: Leverage any existing mechanic (watch next, home, notifs, search), experience surfaces, marketing, partnerships and strategy. Crazy ideas welcome.

[HYPERLINK ██████████]

SHORT TERM THINGS WE CAN DO IMMEDIATELY

1. Disable nitrate promos for casual users (+0.25 kdDAU*)
2. Disable ads for casual users for the first week ()
3. Stop showing non-VOD / red baron stuff on Home ()
4. Turn off yellow track / legacy features on the Watch Page ()

PROJECTS ALREADY IN FLIGHT**Notifications (ongoing)**

Proposal: Optimize growth notifications to get viewers to use YouTube more often. Covers casual-to-core, triggering, nomination, send policy, tray etc.

Hypothesis (proven): If we improve the effectiveness of notifications, we can increase kdDAU

References: [HYPERLINK ██████████] [HYPERLINK ██████████]

POCs: ██████████

Casual user Notification UX (ongoing)

Proposal: Change the UX of notifications for casual users (e.g. first attempt using Endorsements from home to explain why you're seeing a rec)

Hypothesis (proven): YouTube is impenetrable for casual users and we can make our recommendations more accessible by providing user-familiar context

References:

POCs: ██████████

Home (ongoing)

Proposal: Target Casual and Emerging user segments and use proxy metrics that are more sensitive to see if different recommendations on Home can generate more sustained engagement over time.

Contextualization:

- Better nomination for casual users
- Auxiliary scoring heads for casual users
- Tune ranking parameters for casual users

- Joint diversity tuning across home/watch
- Tune casual user diversity in WN

Exploration & Staleness:

- Co-tune survey and non-survey Already Watched demotion on home
- Test survey based demotion on WN
- Build new novel nominator
- Experiment with reducing staleness in prescoring
- Test Hobbs user clusters for novelty
- Improve user controls via N2U rollout/improvements
- + a bunch of metrics work to improve velocity and visibility

Hypothesis:

References:

POCs: [REDACTED]

Search (ongoing)

Proposal: Improve core Search experience for kdDAU users

Hypothesis: Ranking improvements to search results and shelves, exposing diverse content and refinements, easier Search comprehension, top-of-the-funnel Suggest optimizations, and language and platform specific improvements will continue to drive kdDAU.

References: [HYPERLINK [REDACTED]] and [HYPERLINK [REDACTED]]

"https://docs.google.com/[REDACTED]"

[REDACTED] [REDACTED]

Status: Achieved 0.27% kdDAU YTD. In-flight projects across Search – Comprehension (e.g. inline playback, video chapters, snippets, shorts improvements), Suggest (e.g. visual suggest, watch history recall, ranking improvements), Access (e.g. auto-focus on Search on Home, search and suggest styling), and Ranking [REDACTED]

POCs: [REDACTED]

Commented [1]: [REDACTED] Are there any ranking projects targeting kdDAU users that you'd like to highlight?

Twitter Integration

Proposal: Embed YT in the Twitter feed.

Hypothesis: By bringing YouTube content closer to users when they see YouTube links in Twitter they are more likely to engage with the content and broadcast the link to their social graph leading to a virtuous cycle of engagement.

References: [HYPERLINK [REDACTED]]

Status: Experiment launched, pending global launch. Team working through open issues with Twitter.

POCs: [REDACTED]

Impact: 20M+ kdDAU (off-platform), XM+ kdDAU (on-platform)

SnapChat integration

Proposal: Share YouTube videos to SnapChat stories with thumbnails and hyperlinks that deep-link to YouTube.

Hypothesis: SnapChat has a lot of KD users and if they are exposed to rich invitation states (thumbnails) of YouTube videos from their friends in Snap Stories they will be more likely to engage and start visiting YouTube.

References: [HYPERLINK [REDACTED]]

Status: Deal signed and announced, pending launch in YT Music EoQ3 and Main App EoQ4

POCs: [REDACTED]

Impact:

Mobile OEM integrations

Proposal: Integrate YouTube into OEM pre-installed apps

Hypothesis: If we make YouTube easier to access and more ubiquitous then users will be more likely to use it.

References: [HYPERLINK [REDACTED]
"https://docs.google.com/[REDACTED]h]

Status: Deals signed with several OEMs, pending integrations to be completed

POCs: [REDACTED]

Impact:

Unblock YT in firewalls

Proposal: Partner with firewall vendors to provide finer grained control of access to YouTube in place of blocking.

Hypothesis: YouTube is blocked millions of times a day by firewalls globally. If we partner with firewall companies to give finer grained control that will enable more users to access YouTube.

References: [HYPERLINK "https://docs.google.com/[REDACTED]
h]

POCs: [REDACTED]

Impact:

WebView Bursting

Proposal: Require YouTube be watched in the system browser or native app when links are opened in 3P apps.

Hypothesis: If we force users to watch YouTube in the system browser or native app where we have watch history they will get better recommendations because we will get better signal about their true interests which will make them want to use YouTube more frequently.

References: [HYPERLINK [REDACTED]

Status: Project on hold pending eng capacity

POCs: [REDACTED]

Impact:

Open links in WebViews

Proposal: Open all hyperlinks in a WebView within the YT app.

Hypothesis: When users click on hyperlinks in YouTube they are taken out of the app into 3P apps where they may not come back. If we force these links to open in WebViews we have more of a chance of keeping the user in the app.

References: [HYPERLINK [REDACTED]

Status: Project launched and led to DAU increase on YT Main App for users that had 1 or more clicks of hyperlinks.

POCs: [REDACTED]

Impact:

Disable non-VOD content on YouTube Home (aka Zest)

Proposal: Disable non-VOD content on Home

Hypothesis: Non-VOD content on Home is distracting from our core use case which reduces the opportunity for someone to pick a video they might be interested in

References: [HYPERLINK [REDACTED]]

Status: Home team experiment with ablating Posts and it did not do anything

POCs: [REDACTED]

Impact:

Zero-rate video data plans

Proposal: Pay mobile carriers to give their users access to YouTube for free.

Hypothesis: If it's free to access YouTube from the user's mobile carrier they will be more likely to use it.

References: [HYPERLINK "https://docs.google.com/[REDACTED]h]

Status: Approved at YTX.

POCs: [REDACTED]

Impact:

PROPOSED PROJECTS

Elevating high quality, serial content

Proposal: Enable viewers to follow serial content in a reliable and simple way.

Hypothesis: The primary way viewers can follow content today is by subscribing. However, if a viewer is only interested in a subset of the content produced by that channel (ex: a single series), they become less inclined to subscribe to that channel as the alternative is a cluttered subscriptions and notifications experience. This leaves creators with fewer subscriptions (an important vanity metric for growing their business and clout), and leaves them with difficult decisions, like creating spin-off channels that can hurt their overall brand. This proposal would allow viewers to follow 'slivers of content', while still contributing to the overall subscriber count of the umbrella channel.

References: [HYPERLINK "https://docs.google.com/[REDACTED]h] ; [HYPERLINK "https://docs.google.com/[REDACTED]h]

Status: Shopping the idea; there has been an xfn sprint already.

POC: [REDACTED]

Habit building using notifications & commuting

Proposal: Use maps/geo data to determine when users are commuting and serve notifications to watch/listen to a tailored playlist to help build a YouTube habit.

Hypothesis: [HYPERLINK [REDACTED]] tells us that it takes 1-2 months to create a stable habit.

An easier way to do so is to integrate into an existing habit or routine, like one's work commute. By timing our notifications to when a user leaves for their commute, we could tap into their existing commuting habit as established by geo or maps data by either serving them with a listen-first playlist/mix (driving/walking/cycling use case) or a watch-first playlist/mix (train/bus use case).

References: [HYPERLINK "https://docs.google.com/[REDACTED]h]

Commented [2]

As we discussed related to LR:

// Get notif / inbox working on LR

// Ensuring strong Living Room Placement
(https://docs.google.com/[REDACTED])

// Blending YT content into OEM Home screens
(https://docs.google.com/[REDACTED])

_ Assigned to [REDACTED]

Status: just spitballing :)

POCs: [REDACTED]

Offsite Ads

Proposal: Leverage display ads across the web and apps to promote YouTube content the user might like.

Hypothesis: If users see YouTube recommendations when they are browsing the web or using apps they will click on them and use YouTube.

References: [HYPERLINK [REDACTED]]

Status: On hold per Neal

POCs: [REDACTED]

Turn off all Nitrate promos (quick)

Proposal: Disable Nitrate promotions across YT Main

Hypothesis: Nitrate promotions are kdDAU negative (-0.25%), if we disable them we should see a bump in DAU.

POCs: [REDACTED]

References: [HYPERLINK [REDACTED]]

Notes: They have a budget of 1% they are allowed to work within.

Commented [3]: Could we do this selectively for users that are in the casual --> core transition and we temporarily need YT to be as compelling as possible?

Use state transition lift as the success metrics for casual --> emerging users?

Commented [4]: Yes! Can you add?

Commented [5]: Is this DAU or kdDAU?

Casual User Onboarding

Proposal: For users with little/no watch history, build an experience to help them discover interesting content they might like.

Hypothesis: YouTube suffers from a warehouse effect where people

Create a TV-like mode to make YouTube easier to get started with

Proposal: Create groups of Creators/Channels and have them roll up to a unified feed of content as if you are watching Comedy Central, ESPN, Nickelodeon, etc.

Hypothesis: If we bring familiar constructs like channel guides, stations and curation to new users that will help them become more familiar with YouTube and lower the barrier to entry to start using it more often.

Make serialized content easier to discover and use

Proposal: Make content that is designed to be watched sequentially, like TV Show series, easier to discover and use.

Hypothesis: If we bring familiar constructs like serialized content to YouTube it will lower the barrier to entry to start using YouTube more often.

Ads Impact

Proposal: Umbrella for a set of projects to tweak the ads experience (possibly for subsets of users)

Hypothesis: We know that ads impact DAU (from the holdback). We can't turn off ads completely, but we want to try reducing ads for subsets of users in order to retain some of the DAU, but with minimal long-term revenue impact

- **Turn off masthead ad for casual users (quick)**

- *Proposal:* Disable the masthead ad for casual users

- *Hypothesis:* New users to YouTube do not want to be bombarded with ads. If we facilitate a smooth content-first experience they will be more likely to keep coming back.
- *POCs:* [REDACTED]
- **Reduce Instream Ad Load for Casual Users**
 - *Proposal:* Several variants:
 - Reduced instream ad load for casual users (what to do if history is paused or deleted?)
 - Reduced or no instream ad load for the first N minutes or M views for casual users.
 - *Hypothesis:*
- **Compare YT ads holdback to Google search ads holdback**
 - *Proposal:* YouTube ads, especially the instream format, are significantly more annoying than Google search ads.
 - *Hypothesis:*
- **Look at ad load by country**

Accelerate anti-abuse measures of 3P Apps like Vidmate and Vanced

Proposal: accelerate the existing [HYPERLINK

"https://docs.google.com/[REDACTED]h], including increasing PM, Eng, UX & partner manager resourcing (xPA including YT, Core, WebView and Android) as well as fast-tracking detection & enforcement systems approval.

Hypothesis: There are currently ~600M end users on the top 3 abusive apps both AVOD (Vidmate & SnapTube, >530M) and SVOD (Vanced, 54M). While there is no guarantee of "user recovery" following enforcement (particularly with meta-apps like Vidmate which serve content from multiple video platforms) acceleration of the proposed enforcements, UXR studies and any external messaging will (at minimum) limit the number of new or existing users from using these apps to view YT content.

Commented [6]: [REDACTED]

Can you also drop in a summary here following the pattern?

_Assigned to [REDACTED]

Commented [7]: updated - PTAL thanks.

Turn off yellow track / legacy features on the Watch Page

Proposal: accelerate deprecation / migration of legacy features on the watch page that are known to cause user confusion, but have been difficult to fully remove. Some examples like info cards are known to be WT negative (tested w/ ablation experiment). Others are known to cause confusion / hurt Watch Next WT without driving offsetting gains (creator branding, multiple hashtags, duplicate merch / ads shelves).

Hypothesis: previous experiments have shown user dissatisfaction / negative metrics with features that interrupt the video viewing experience or clutter up the page with less important information.

Continue cleaning up the page to drive a better user experience (see also [HYPERLINK

[REDACTED] on home)

Commented [8]: [REDACTED]

_Assigned to [REDACTED]

Commented [9]: Can you add more details please?

Commented [10]: Updating this now

Commented [11]: _Marked as done_

Commented [12]: _Re-opened_

thx do you have any DAU estimates?

Commented [13]: I don't -- the experiments we had with info cards settled around +0.3% YTT, though we didn't see movement in DAU during the period we ran (we didn't check kdDAU at the time).

Commented [14]: Would it make sense to run an experiment to estimate it if it's east?

Commented [15]: Easy

Commented [16]: Lemme check in with the team to try and understand how difficult it'd be to run this. Stay tuned.

Netflix-style Home page

Proposal: Make the YouTube Homepage focused on fewer, more enticing videos/series similar to the Netflix home page.

Hypothesis: Users familiar with Netflix will appreciate the simplicity and similarity which will make them more likely to engage with YouTube content.

Block all Embedded playback after 30sec and require a deep-link to YouTube

Proposal: Do not allow off-platform YouTube playback

Hypothesis: If we force on-platform YouTube to be the only place to watch YouTube it could increase frequency of use.

Allow downloading videos

Proposal: Make downloading video free for all users

Hypothesis: Downloading YouTube videos is a top requested product feature and allowing all users to do this should spur more YouTube usage. Prior efforts here resulted in +5% DAU in emerging markets.

Commented [17]: [REDACTED] I dug this up from the grave: <https://docs.google.com/> [REDACTED]

The data's ancient and it's from EM (not KD) markets, but it was an "ads holdback sized" result for our EM users.

Integrate YouTube uploading into Adobe Premiere / other video editing tools (like TikTok does)

Proposal: Make it dead simple for Creators uploading to TikTok to also upload the same content to YouTube.

Hypothesis: If YouTube has all of the same content as TikTok, there will be less of an incentive for users to go to TikTok.

Mini apps

Proposal: Allow 3P developers to integrate their app into parts of the YT app to help complete scenarios (e.g. save ingredient list to shopping list, save list of places to Google Maps, purchase tickets for movie, save workout to Strava, etc.).

Hypothesis: If we make YouTube more of a place to get things done and be productive (e.g. purchasing flights, saving ingredients, learning), people will seek to use YouTube more often.

References: Like WeChat Mini Apps, [HYPERLINK [REDACTED]] and [HYPERLINK "https://newsroom.tiktok.com/en-us/tiktok-jump-enriching-the-tiktok-experience-with-new-integrations" \h]

Google Maps integration

Proposal: Integrate YouTube into the Places UI on Google Maps.

Hypothesis: If we show people that YouTube has context-specific content that is relevant to them when they need it they will be more likely to come back to YouTube later for their other information seeking needs.

Year-in-review / my top creators share-out

Proposal: Create a 'Year in Review' for each user with a list of their top watched creators that can be easily shared on social media and messaging apps.

Hypothesis: There is not a lot of broad awareness of what Creators your friends watch. If we lower the barrier of entry to share what Creators people watch with others it will lower the barrier to entry for less engaged users and get them interested.

Provide free YouTube on airplanes

Proposal: Make YouTube free to access when on airplanes.

Hypothesis: Users on airplanes are often bored and may not have content readily accessible to them to keep them occupied. If we make YouTube free to access via free WiFi or in-seat entertainment then we can lower the barrier for consumption and discovery.

Notes: Tiktok is doing something [HYPERLINK "https://www.theverge.com/2021/8/4/22610408/american-airlines-free-30-minute-tiktok-in-flight" \h]

Messaging app

Hypothesis: If YouTube is seen as more than just a place for transactional lean-back entertainment but a place to hang out with friends or a place to check-in with that could lead to more YT consumption.

Proposal: Introduce a swipe mechanic on the home page that has only a feed of Posts.

Hypothesis: Introducing a casual browsing surface similar to other platforms could lead to more casual engagement and increase frequency of use.

Proposal: Stop making Posts require a tap to see the full contents.

Hypothesis: Users are not used to having to tap to see the contents of a feed item. It makes the UX less

Proposal:

Hypothesis:

- Private channels
- Broadcast TV network
- Show about YT
- In person marketing events
- Public shared playlists
- I'm feeling lucky
- Signature Creators - best of YT - more organic marketing / buzz
- Free YouTube TV on YouTube; ads are for YouTube Creators.
- Unity and simplify our social engagement channels
- Tiktok seo → YouTube shorts
- Let Creators make their own you.tube vanity URLs
- Casual gaming platform
- Pay Apple to be the default search engine
- Get Chrome to put YouTube as a default search engine
- Awards show / viewers choice awards
- China
- QR codes for channels
- Creator promotion
- Optimized thumbnails
- QR Codes ([\[HYPERLINK\]](#) [REDACTED])
- Exclusive deals (e.g. with tiktok guy that has 100M followers)
- Re-imagined home page for youth, more like a party
- YouTube Select
- Inbox in Living Room
- Inbox on mobile

- Bell on Living Room
- Paying for icon placement in living room w/ oem manufacturers
- Apple Watch / Notifications
- Living Room screensaver
- Less metadata, more visuals and curated
-

Interesting things in competitive space

- Mini apps
- [[HYPERLINK "https://techcrunch.com/2021/08/11/tinders-interactive-swipe-night-stories-return-after-a-20-million-user-turnout/"](https://techcrunch.com/2021/08/11/tinders-interactive-swipe-night-stories-return-after-a-20-million-user-turnout/) \h]

-Elevate our corpus: Build a "content introduction" product... like introducing users to approachable shows and creators. Emphasize content that makes YT unique... like niche topics/channels.

-Build ownership: Create a ramp up/set up experience (videos to save, creators to sub to, searches to save, topics of interest to browse; communities to belong to). Almost like an interactive tutorial of the product that we reveal progressively.

-Minimize \$, maximize value-add: Like replacing Ads with Edu PSAs.

Bets & Inches

- **Inch Projects** - these are projects that we think will move kdDAU incrementally using our existing key levers (watch next, home, notifications, search). This is applied science and requires lots of experimentation and iteration.
- **Bet Projects** - these are projects that are outside of the realm of our core incremental quality work on our levers and require specific prioritization and investment (e.g. shorts, twitter/snapchat integration).