

AMENDED Exhibit 784

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

Attorney Client Privileged

Empowering U18 Identities

YOTTI 2-pager (September 2021) - [HYPERLINK [REDACTED]]

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The proliferation of age based regulation means we can no longer be age agnostic in our products' roadmap and drive the need to not only ensure we are confident of our users' age but also to provide all users an age appropriate experience. What do we need to do to make kids / family a first class experience in YT? How do we empower powerful, consistent and safe kids' experience across all YT surfaces and all geographies? How do we reduce / eliminate fragmentation of identity states for minors and proactively mitigate creator risks?

Problem Statement

The young user group is expanding because we now include "inferred" as well as "declared" age. In addition to getting bigger, the group is fragmented into different states (e.g geo) and modes (e.g supervision) and we need to make the complexity sustainable. Building age appropriate experiences for young users is complex, therefore it does not scale to reactively retrofit when met with pressing regulatory requirements.

It's our key responsibility to continue providing tailored age-appropriate and scalable compliant experiences for young users. To achieve this goal we need to get on our front foot and ensure roadmaps across YouTube products are not age-agnostic.

Proposal

1. Make children focused design a requirement in all product decisions

Ensuring we are redirecting all ranges of users to the right identity state or to the right "age appropriate" experience is key in this new world in which age agnostic design doesn't scale to meet our compliance and user needs. Similar to how we approach security, privacy and accessibility workstreams, we propose to establish resources and processes - similar to security and accessibility - to ensure consideration and compliance.

2. Get control of age assurance compliance narrative

[REDACTED] based on our Google age assurance model and they are required to age verify to access mature content and ads personalization. As it's expected to adopt a similar approach globally, we should move with urgency to determine the best way to move forward as it's KOF-sensitive mode that introduces friction to our users:

1. **Proactively aligning experiences globally:** Design and build the desired global experience for "inferred minors" complemented with informed user research.
2. **Launching effective verification & transition flows:** Launch new or improved user-friendly age verification user journeys (e.g SMS verification) and provide appropriate graduation/transition flows that allow misclassified users to get back to the normal experience.
3. **Scaling age assurance infrastructure:** Build scalable infrastructure to integrate Google-wide regulatory requirements & platform (e.g cross domain sync, age classifier updates)

3. Eliminate legacy identity modes

Due to past regulatory requirements (e.g GDPR) we still support legacy experiences for supervised accounts that access a non supported YouTube experience, introducing product and engineering complexity. Let's ensure full control over the different identity experiences for young users by:

Commented [1]: 1. Support all YT teams in meeting these responsibilities. Establish processes and resources — similar to security and accessibility — to ensure consideration and compliance.

Commented [2]: where do you see gaps in our efforts to get people into the right identity state, or have the right experience, today?

Commented [3]: The biggest gap is in "sustainable retention", we have big efforts in detection/age assurance and redirecting users to the "right state" (e.g bamboo, athena, 18+ classifiers), however redirected experiences are not what those users are looking for. Creating new accounts is easy so we are in this constant cycle and not solving the problem: "how do we get users excited about providing their real age?" "why are they lying about their age?"

Commented [4]: And an [REDACTED] bit?

Commented [5]: what is our perspective on age inference? Is it important to get better and require us lobbying other parts of Google? Do we think it should not be used at all? Another option?

Commented [6]: Age inference makes sense, however we need more user friendly options to allow users to confirm they are not 18+ and more effective ways to [REDACTED]

Commented [7]: Personally, age inference makes me uncomfortable. It may be beneficial for a period of time, or as a helper in egregious or especially sensitive [REDACTED]

Commented [8]: +1 with you [REDACTED] it isn't a great long-term solution but as [REDACTED] pointed out we do need a more user friendly way to confirm age.

Commented [9]: Is there anything YT can do to reduce this number? e.g. finding ways to encourage proactive age declaration/verification?

Commented [10]: +1 with the idea of proactive age verification, it would be great to brainstorm and research how we can request to users to age verify [REDACTED]

Commented [11]: I agree too. The age declaration piece in itself could be valuable too to reduce part of the complexity. It might have some concerns around [REDACTED]

Commented [12]: Interesting --- question "by age declaration piece" are you referring to "self declared" age?

Commented [13]: can this shorten to a sentence or two? The TLDR is that we're doing 10-35 in EU and expect to do similar globally. So we need to do some [REDACTED]

Commented [14]: +1. Will work on it.

Commented [15]: Updated, PTAL

Commented [16]: what are other examples of possible friendly age verifications?

Commented [17]: Phone/age verification and live selfie. Currently the future forms of verifications are centralized at the google identity team, which has pro [REDACTED]

4. Proactively mitigate Creator risks due underage initiatives

Current supported experiences for underage users force us to take away creation features from impacted users that are transitioned from a normal to an underage experiences due to age screening or age assurance regulatory efforts, such as Athena, Audubon and EdUniTube. requiring reactive solutions to mitigate Creator risks. While we define the roadmap for creation & community experience for supervised users we can implement the following proactive efforts in the interim:

1. **Proactively pave the way for Creation for tweens and teens:** Enable granular control over channel level features by integrating them into Feature gates library, an extremely xfn effort that even though it's back-end focused will pave the way to accelerate the front end changes when the product plan for creation experience for tweens and teens is defined.
2. **Expand self-serve channel transfer:** Allow underage flagged users to preserve their channel by expanding self-serve user channel transfer feature into Google's (Unicorn) parental consent flow.
3. **Introduce YouTube experience "grace period" for a smoother transition to a restrictive experience:** Launch a "grace period" in which the full experience is available except the ability to create and consume by leveraging the MRM framework before enforcing SupeX and fully blocking channel access. This requires an effort to fix the gaps and ensure all relevant user journeys are properly blocked via MRM.

North Star

Users under 18 are welcomed on YT and we embrace our responsibility to provide tailored age-appropriate and scalable compliant experiences.

Impact Assessment

- Minimized business and user impact associated with "inferred minor" expanded globally
- Increased approach to proactive compliance due to increased focus on children oriented design across YouTube products
- Proactive compliance and reduced engineering debt via simplified identity model and experience

Stakeholders

Our stakeholders are all of YT, more specifically Kids and CoreX teams. Furthermore, external stakeholders are the Unicorn, Google Identity, Google Workspace, PDPO, PLT and Ads team to align with Google's overall compliance efforts.

Downside Analysis

Avoiding a proactive approach will potentially allow us to still address regulatory requirements, however will require us to continue doing strong trade offs on user experience, brand reputation and business metrics.

Commented [18]: For institutions that use the DNS feature today, they will no longer be able to set policies for their network regardless of signin status. I'm not sure what the prevalence is, but places like public libraries may have a DNS use case that cannot be replaced w/ dasher accounts. Additionally, the Dasher policy only helps on devices where sign in is required (eg, some managed Chromebooks when configured appropriately)

Commented [19]: [REDACTED] what are your thoughts on this?

Commented [20]: I think we want to deprecate them on a separate path, rather than replace with Dasher controls.

Commented [21]: This is not clear for me, can you please explain further?

Commented [22]: I'm not sure if this should be part of this 2 pager. This is mostly relevant to MRM as an infrastructure and not specific to kids, correct?

Commented [23]: work on summarizing this one further

Commented [24]: if we had private channels, would it help here?

Commented [25]: Yes, private channels will definitely help this initiative, however I believe this will become a multi-year or multi-quarter project, and I'm not sure if ...

Commented [26]: [REDACTED] is this accurate?

Commented [27]: This is a good description of one way to do it. However, I am not sure this is the best approach. For SupeX, we feature gated only what wa ...

Commented [28]: Understood – my concern is that defining the product plan for creation will take time and this is back end effort would be massive effort

Commented [29]: I do understand your concern on thrown away work and maintenance challenges.

Commented [30]: Not sure this is feasible, but are there high-confidence areas where product alignment is easier? Like "no live for supex users" or something ...

Commented [31]: By "no live for super users" does that mean "no capability to upload livestreaming"?

Commented [32]: Yeah. I know it isn't typical to do product alignment in stages, but do you think that's feasible? If we knew we would exclude a class of ...

Commented [33]: I mean, the issue is that if we want to only "prevent livestreaming uploads", then we can't do it unless all the cross functional teams hide the res ...

Commented [34]: Overall, both approaches has pros and cons.

Knowing age
Transitions between different ages
Parents and KOFs – need to threat users differently