

AMENDED Exhibit 82

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

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

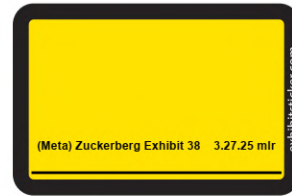
MDL No. 3047

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

Well-Being Summary [Tech for Social Good]

The goals of this doc are to discuss and align on:

- 1 - **What we know** about FB & well-being.
- 2 - The **vision** for this work.
- 3 - The **framing** for this work.
- 4 - **Comms** opportunity.



TL;DR

The impact of Facebook Inc.'s products on people's well-being is a complex topic that we haven't fully understood yet. However, we have sufficient information to warrant action now, while we continue to deepen our understanding.

1. Despite all the positive effects that FB provides (e.g. meaningful interactions, belonging, social support), there is increasing scientific evidence (particularly in the US, see [here](#) and [here](#)) that the **average net effect** of FB on people's well-being is **slightly negative**. The science here is still early, primarily US based, and relying on self report – we have a lot more we need to learn.
2. While we don't know why FB causes this negative effect, we have deep understanding around **three** negative drivers that occur frequently on FB and impact people's well-being:
 - a. **Problematic use** (prevalence: 55% mild, 3.1% severe)
 - b. **Social comparison** (prevalence: 40% mild, 5% severe)
 - c. **Loneliness** (prevalence: 36% mild, 7% severe)
3. We believe we should prioritize the work as follows:
 - a. Move in the areas we have confidence in:
 - i. **Problematic use**: Given its prevalence and our confidence around product interventions (NF pause points, prominent time controls and goals, night mode), we will tackle this area first.
 - ii. **Social comparison & Loneliness**: We will build a playbook (product ideas and execution plan) for each of these before moving into execution.
 - b. Better understand work:
 - i. More in depth research around measurement, understanding why there is a net negative effect and for whom, competitive landscape, comprehensive and prioritized list of additional areas to focus on.
4. We have a two-phase vision for this work: in phase 1, we want to push FB to be "**best-in-class**" amongst social media apps (2019), and in phase 2, we want to push for FB/IG **to be net positive to well-being** (2020 and beyond).
5. Principled investment ask to take this on:
 - a. FB: A product effort (+11 HC: 3 Eng, 8 XFN) and resources to focus on measurement+research (+6 HC: 1 Eng, 5 XFN) (total of +17 HC).
 - b. IG: +7 HC (1 Eng, 6 XFN) to ramp up measurement+research work.

What we know today

WHAT IS WELL-BEING?

Today, the term well-being is thrown around to cover numerous areas. Apple and Google have been talking about Digital Well-Being, in which they are largely talking about helping people better manage their time with technology (particularly smartphones). Within Facebook, the term is sometimes used to cover a wide range of areas - from controls around technology use to suicide/self-harm to whether Facebook is a net positive in the world.

For the purposes of this memo, we are talking about **subjective well-being** - how a person evaluates their own life, including life satisfaction and the extent to which they experience positive and negative affect. Psychologists don't have a standard definition, and there are multiple facets including supportive relationships, control/autonomy, and learning. Well-being is not just feeling happy; it also includes having a sense of meaning or purpose in life, which is linked to longevity and improved health.

We should note there is a related, but separate, workstream around measuring progress against our mission of "bringing the world closer together" and measuring the value that mission creates in the world. While that is inclusive of well-being, it is also encompassing things like economic opportunity, mobility, civic, and other dimensions. Here, we are just focusing on well-being.

OVERALL IMPACT OF FACEBOOK ON WELL-BEING

The best external research suggests that the overall impact of Facebook on well-being is negative but small. This does not mean that there aren't aspects of Facebook that are positive for well-being. Facebook is a platform where people can enhance their social relationships and fulfill important needs like belonging, support, accomplishment, and pursuing interests - uniquely powered by access to social connections. However, Facebook can have a negative effect when people feel a lack of control over the experience or when use undermines other positive aspects of life. The science here is still early, primarily US based, and relying on self report - we have a lot more we need to learn.

We don't yet fully understand all the reasons why Facebook may be net negative, deeper research is needed and planned. Though we do know:

- "In-the-moment" well-being is lower while using Facebook than most other daily activities. It's also lower than Netflix and TV, higher than LinkedIn, and similar to IG and YouTube (see Figures in Appendix). That said, we don't yet know for sure if these activities are impacting well-being or if people's well-being is driving their choice of activities.
- Active interactions with close friends and receiving feedback from them on posts are associated with improvements in well-being whereas more passive behaviors like scrolling/browsing and watching videos are not. → *These insights, in part, led to our feed ranking change for meaningful social interactions (MSI) last year.*
- Feeling in control of one's experiences in life, including technology and interactive media, is associated with more positive psychological effects. → *"Your Time on Facebook/ Instagram" is an example of a feature related to increasing agency and control, and (for those who used it) it led to increased feelings of control and satisfaction with FB time spent.*

Youth. Findings for teens largely mirror findings for adults; overall associations between social media use and well-being are net negative but small, explaining at most 0.4% of the variation in well-being. Moderate use of digital technology is not intrinsically harmful and may be advantageous. The relationship between teens' social media use and their well-being does not fit an "either/or" framework: Experiences can be positive or negative depending on the individual. The most vulnerable teens offline are also the most vulnerable teens online (e.g., **teens from lower socioeconomic backgrounds are at greater risk for negative consequences of their time spent online**).

Instagram. Our current understanding of how using Instagram affects well-being is limited due to fewer external and internal studies. **Some work** suggests the impact of Instagram on well-being is similar to using Facebook in the moment. **Our initial work internally has not found a relationship between well-being on Instagram and time spent on**

Instagram, although Instagram teens scored worse than adults on general well-being, negative affect (US, UK, BR), loneliness (US, UK, BR), and depression (only in US).

CURRENT AREAS OF FOCUS

Our current focus has been on three key areas that occur frequently on Facebook and impact people's well-being: **problematic use**, **loneliness**, and **social comparison**:

- **Problematic Use:** Occurs for 3.1% of Facebook MAP (US data only), with 55% globally experiencing a milder form of unintentional use (i.e., "spending too much time on social media"). **More common in younger men.**
- **Social Comparison:** Occurs chronically for 5% of Facebook global MAP (similar for Instagram), with 40% experiencing comparison within the past month. **More common in people under 30 and women.**
- **Loneliness:** Occurs chronically for 7% of Facebook global MAP, with 36% experiencing loneliness within the past month. **Higher prevalence in younger adults (age 18-24), veterans, and individuals who identify as LGBTQ.**

WHAT WE DON'T KNOW & NEED TO LEARN MORE ABOUT

- **International effects:** Most external research on well-being is done in US/West, we need to understand if net negative effects are also seen globally.
- **Individual differences:** There are many factors contributing to well-being and Facebook may play a bigger role for some people than others, **we need to know for whom the positive or negative effects are strongest.**
- **Expectation effects/effects of press:** Beliefs about how Facebook affects one's well-being (heightened in the west due to excessive negative press) influence how people self-report impact of Facebook, **we need to better disentangle expectation effects from true effects.**
- **Longitudinal and causal impact:** We need more robust research to understand how Facebook impacts people over time, and **we need to better understand which negative effects (eg, loneliness) Facebook is causing vs. which negative effects show up because people are more likely to use Facebook when in that state.**
- **Comparative understanding:** We need to better understand how the impact of FB on well-being differs (or doesn't) from other apps and other interactive media. **Is it possible for any inherently social app to be positive without these problem areas?**
- **Impact of positive aspects of platform:** We know that Facebook contributes positively to people's well-being, **we have to better understand those full range of positive effects, how deeply they effect people, and how the negative effects interact with/outweigh the positive effects.**

MEASURING WELL-BEING

Just as there is no standard definition of well-being, there is also no broadly accepted standard for measuring well-being, either within industry or academia. A key decision for H1 is to articulate and finalize a measure of well-being. We plan to approach in 3 ways:

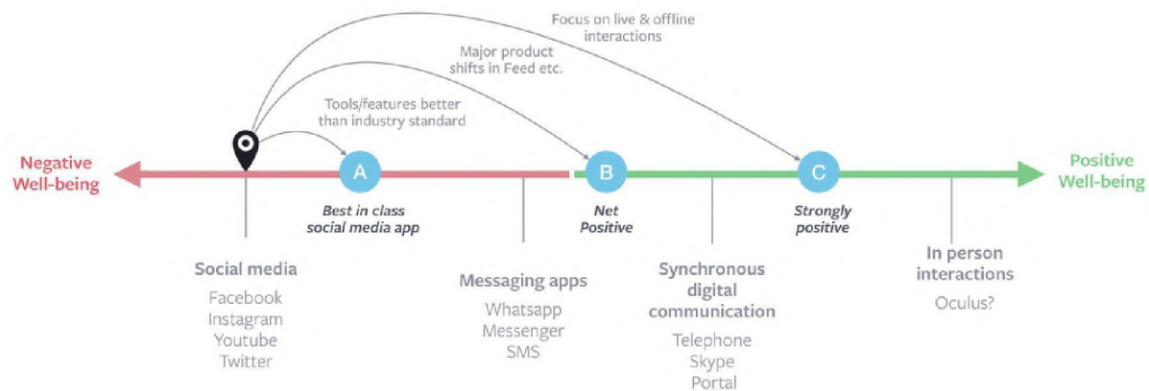
- **Top Down Measurement:** measure high level composite of subjective well-being that includes life satisfaction, positive affect, and negative affect.
- **Operational Proxies:** develop proximate measurements of top down measurement using on platform behavior and survey inputs.
- **Bottoms Up Measurement:** measure specific areas of well-being individually - problematic use, loneliness, social comparison (to evaluate progress in those specific areas).

Vision

1 - There are different end-states we can pursue for this work, from being “best-in-class” amongst social media apps at the lower end of the spectrum, to being as good as offline human interactions at the highest end of the spectrum. What end-state should we target?

Roughly speaking, we could pursue three distinct end-states (A, B, and C outlined in the visual & table below). We assess these end-states based on three criteria:

1. **Operating responsibly:** Does the end-state ensure we are taking our responsibility seriously, i.e. preventing harm on people (even if it's small on average)?
2. **Long term sustainability:** Does the end-state ensure we mitigate long term business risk by getting ahead of potential problems?
3. **Level of difficulty:** How difficult is it to achieve this end state?



(source [here](#) and [here](#))

We recommend pursuing an end state where FB is net positive to well-being (**path B and C**), but we believe this is going to be really hard. Therefore we recommend phasing this work where we pursue **path A** in **2019**, gain better understanding on what it truly takes to get to path B and C through this process, and then pursue **path B and C** in **2020 and beyond**.

Framing & Priorities

2 - We've broken down the broader well-being space into clearly defined sub-areas. If funded, we can tackle these sub-areas in order of priority. We will pursue product work on “Problematic Use” first given its prevalence and our confidence in product interventions.

The way we're thinking about well-being is to enumerate key sub-areas and evaluate each against the maturity framework used by Integrity with a few slight modifications (eg, our zero level maturity is "Limited" instead of "Risk" as not all sub-areas of potential investment for well-being are a risk/negative for well-being).

- **0 - LIMITED:** We have limited (if any) understanding of this sub-area.
- **1 - BASIC:** We have initial understanding of the sub-area, but have not yet developed a consistent playbook or measurement.
- **2 - MEASURED:** We've established measurement and developed a first playbook to tackle the sub-area.
- **3 - OPERATIONAL:** We've executed to tackle the sub-area, in a way that is measurable and attributable.

	Sub-Area	Prevalence (severe/mild)	Priority	-	Current Maturity - FB	EOY Maturity - FB (if funded)	-	Current Maturity - IG	EOY Maturity - IG (if funded)
1	Problematic Use	3.1% (US only) / 55%	H		2 - MEASURED	3 - OPERATIONAL		0 - LIMITED	1 - BASIC
2	Social Comparison	~5% / 40%	H		1 - BASIC	2 - MEASURED		0 - LIMITED	1 - BASIC
3	Loneliness	7% / 37%	H		1 - BASIC	2 - MEASURED		0 - LIMITED	0 - LIMITED
4	Measurement work (overall well-being)	n/a	H		1 - BASIC	2 - MEASURED		0 - LIMITED	1 - BASIC
5	Other areas (e.g. Mental Health, Conflict, MLEs, Social Support, etc.)	n/a	-		0 - LIMITED	0 - LIMITED		0 - LIMITED	0 - LIMITED

Competitors

Google and Apple have efforts devoted to "digital well-being" that focus on providing tools so people can control their time on the platform/usage of the platform. We focus on "digital well-being" as well (mostly tied to problematic use/unintentional use), and launched "Your Time on Facebook" and Instagram time control tools last year.

But we are taking a more holistic and proactive stance on the space. We believe it's not sufficient to provide tools to people and assume everything is going to be positive, we want to understand and ensure that our platform has a net positive impact on people's lives and their well-being more broadly, even if it requires fundamental changes to the platform. There are many ways FB touches people's lives that can be positive for well-being (getting a job, engaging with friends or meeting a romantic partner, access to social support and health info, etc.) and we want to amplify those opportunities as well as fix potential problems. Our work will anchor on problematic use as a first step, but will rotate into social comparison, loneliness, and other positive drivers of well-being like social support and belonging, which may need more foundational changes to the platform.

Communications Opportunity

Topline: We should seize the opportunity for Facebook Inc. to lead the industry on well-being. It can be a key driver in our change narrative and help us rebuild trust. We need to show not just tell through a steady cadence of products and tools.

External state of play:

- The current discussion with mainstream media, policy makers, elites, and critics is focused on tech/social media addiction and impact on kids and teens.
- The launch of our Time Well Spent tools for FB and IG in August 2018 was well received and bought us time.
- Google and Apple are *slightly* ahead of us. They were first to market with time well spent tools in June 2018 and most recently:

- Google [announced rollout of Digital Wellbeing](#) to more devices include Nokia and Samsung. It has also [rolled out screen time and app management features](#) to the Chrome OS version of its parental supervision app, Family Link.
- Tim Cook is [demonstrating attention to this across all areas of company](#), including unexpected such as in original content

Opportunity: This topic goes in and out of media cycles, but will be a long term issue for the company and the industry. Build an integrated, global public affairs campaign that helps establish Facebook Inc. as an industry leader who cares about the well-being of its community and society.

- Lean into our strengths: Highlight how Facebook provides social support which is critical for well-being.
- Get credit for listening and learning: Listening tour with industry, academia and critics on problematic use, social comparison and loneliness. Hire a big name advisor in this space who will lend credibility (i.e. Vivek Murthy, former Surgeon General). Host sessions on the future of technology and society with regard to well-being (facilitated by Mark, Sheryl).
 - Include internal component to not only drive employee engagement around this, but to also serve as a proof point that this issue deeply matters to us personally and as a company we're committed to solving this.
- Potentially double down on teens: Help teens become savvy and safe "digital citizens". Make the discussion about social media and smart phones/technology (i.e. drag Apple into this). Pairs nicely with IG focus on anti-bullying.
- Lead the industry: Create and lead an industry consortium; launch an index to prove we're in this for the long-term. Be first to deliver "best in class" products and tools. Include partners outside tech/SV; engage client council for support and thought leadership
- Focus on consumer press: While the headwinds from elites continue, we can win with consumer press. If we want to turn the reputational tide through consumers, we need to drive and scale sustained, global and innovative campaigns.
- Package our efforts: Create a dedicated site like [Google's Digital Wellbeing](#) (separate from - and potentially to replace - [existing resources](#))

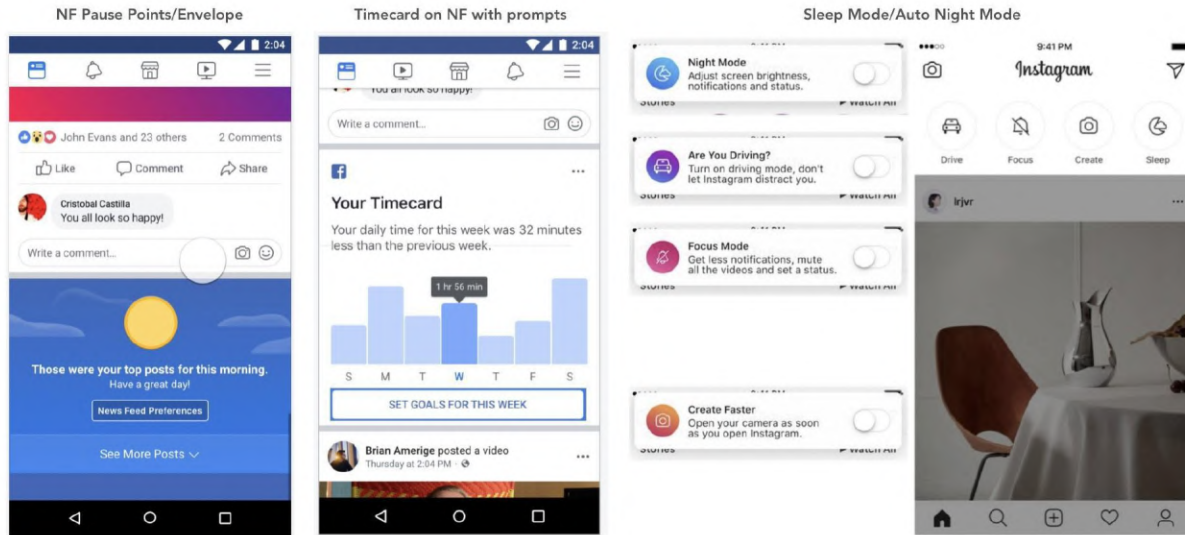
Next steps: With alignment on this proposal, the team will share a campaign - along with any resourcing asks -- by March 22.

Appendix

DIRECTIONAL IDEAS FOR TESTING

Research shows that problematic use is correlated with increased time spent, sessions and night time usage (more [here](#)). Furthermore, our "Your Time on Facebook" feature (launched in 2018) improved perceptions of control and had high user satisfaction (63% found it extremely useful). We plan on building on these learnings, with a select sampling of ideas described below:

- **NF pause points:** NF reaches an end-point after a certain number of highly relevant posts and people need to actively choose to keep going.
- **Prominent surfacing of timecard on NF** (including prompts to set goals): Daily or weekly reports of time spent prominently surfaced in NF with prompts to set goals/limits.
- **Sleep/auto-night modes:** Change multiple settings on the app (including notifications, muted app colors, NF pause points and recurring reminders of time spent in NF).



Measuring success (EOY 2019):

- Reduce prevalence of problematic use from **3.1%** to **2.6%**.
- Reduce prevalence of unintentional use from **55%** to **47%**.
 - Using standardized survey ("negative life impact" + "problems w control" questions for problematic use and "problems w control" questions for unintentional use).

RESOURCING

3 - Funding has been limited so far - on FB, we have a strong research core and a PM, with a few borrowed part time eng, data, and design resources (total of ~11 HC). On IG, we have a fraction of a researcher and no DE/DS/CDS/Design/PMs. With no additional investment, we are on a trajectory to deliver exploratory findings (and NO product changes).

We recommend investing in both the product effort and the measurement+research effort. With just the product effort we would proceed more along **path A** vision (make FB/IG best-in-class amongst social media apps), whereas the measurement+research workstream would enable us to pursue the net positive vision through greater understanding of issues and areas of impact (**path B**).

Invest in	What we need?	Functions	What we get?
Facebook			
No Additional Investment	0 HC	n/a	-- Playbook for social comparison. -- Playbook for loneliness. -- Exploratory learnings (well-being measurement). -- NO product changes.
Product Effort	11 HC	3 eng, 2 UXR, 1 design, 1 PM, 2 DS, 1 DE, 0.5 CS, 0.5 PMM	-- Build tools and products to address problematic use, reducing prevalence from 3.1% to 2.6% by EOY 2019. -- Subsequently launch programs to reduce prevalence of social comparison and loneliness. (Positions us for Path A vision : best-in-class social media app)
Measurement + Research Effort	6 HC	1 eng, 3 UXR, 1.5 CDS, 0.5 DE	-- Operational V0 measure of well-being. -- Understand what drives net negative effect and playbook to make FB net positive. -- Measure well-being across other product areas (video, groups, etc.). -- Deep dive & measure existing focus areas. -- Identify and prioritize additional focus areas. (Positions us for Path B vision : net positive to well-being)

Instagram			
No Additional Investment	0 HC	n/a	-- Limited incremental exploratory learnings around well-being measurement. -- NO measurement or playbook around problematic use, loneliness, or social comparison. -- NO product changes.
Product Effort	We are not asking for product investment at this time since we believe we need to develop greater maturity in understanding first to develop a playbook for product development.		
Measurement + Research Effort	7 HC	1 ENG, 2 UXR, 2 DS, 1 DE, 1 PM	-- Operational V0 measure of well-being. -- Understanding of the biggest drivers of well-being related to Instagram usage to prioritize deeper dive. -- Initial understanding of the highest priority well-being drivers with a stretch goal of developing playbook for IG WB product teams to act on in H1 2020. -- Build out measurement tools in collaboration with FB.

GUIDING PRINCIPLES

Given the ethical considerations with this work, we've outlined some initial principles to guide this work. These will be reviewed and updated in consultation with ethics experts.

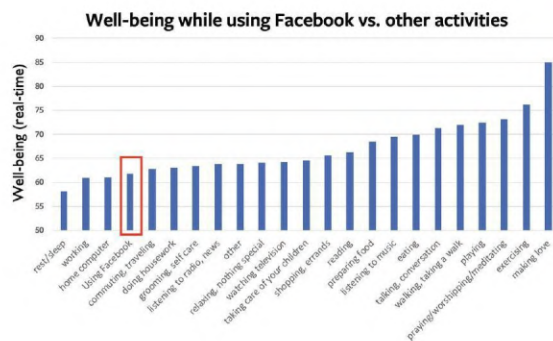
1. **Privacy.** We will preserve the privacy of an individual and of a population. We won't target profiles based on any sort of assessment of a person's well-being. We will adhere to standard Privacy XFN requirements about data use and preservation.
2. **Transparency.** We will tell people that we're working on well-being, both on the external side (PR) and the product side (in surveys, etc.). We will target based on behavioral signals, such as the amount of time a person spends on Facebook. While we may not tell someone in the moment why they're seeing a certain intervention, we will not hide those details in our marketing efforts.
3. **Autonomy.** We don't presume to know what's best for someone and their well-being. We will empower people to make informed decisions, and give them the capacity to act intentionally. Our job is to build the right tools, dashboards, and controls, after which people will choose what's right for them. When there are areas where the most people could benefit from a certain experience, we will push for a wholesale change to the platform.
4. **People-Oriented.** Not Facebook-oriented. This work is intended to make Facebook net positive for people. The primary beneficiary is the user; if there is a halo effect for Facebook (PR or metrics such as reduced deactivations), it's a secondary priority. We design with stress cases in mind and consider vulnerable populations.

CURRENT WELL-BEING RESEARCH UNDERWAY

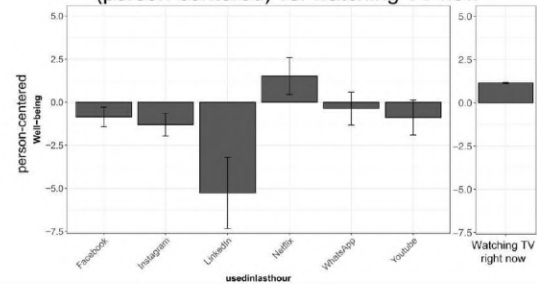
- Deep dives on social comparison and loneliness to understand people's experience of these issues, identify people problems, and generate possible product solutions.
- Establishing measurement for problematic use, loneliness, social comparison.
- Deprivation study to understand effects of not using FB & IG on well-being (internal replication of Stanford/NYU study).
- Large "top down" measurement effort to allow us to understand what is causing negative well-being effects (for whom, what FB activity, what facet of well-being are most implicated).
- Identifying and prioritizing additional risk and opportunity areas for FB and well-being.
- Competitive study to better understand how people perceive the positive/negative force of FB compared to other apps (e.g., this app adds positive value to my life, is respectful of my time, allows me to do things I couldn't do otherwise).
- Relationship between intent, context, in-session experiences and well-being.

WHAT WE KNOW ABOUT WELL-BEING: COMPARATIVE MEASUREMENT

Compared to other activities: Well-being is lower while using Facebook than most other daily activities, like caring for children or cooking. It's lower than Netflix and TV, higher than LinkedIn, and similar to YouTube (see Figures). These “in the moment” estimates reflect multiple causes: A person may use an app because of their well-being (e.g., I'm lonely and open Facebook, unhappy at work and open LinkedIn, content with my family and start a movie), and app use may influence well-being (e.g., Facebook and LinkedIn make me feel worse about myself by comparison to others). Also, people's beliefs about how social media *should* affect them might influence these results: A lot of research is conducted in the west, where there is a strong public narrative that “social media is bad for you.”



Well-being now related to social media usage in past hour (person-centered) vs. watching TV now



People report relatively low well-being while they're using Facebook compared to other activities. Well-being is similar on other apps; Netflix is higher and LinkedIn is lower. These effects are not causal; for example, people looking for a job could have lower well-being and thus use LinkedIn. From trackyourhappiness.org.

DOCUMENT SLIPSHEET

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