

AMENDED Exhibit 881

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

9/29/2020, 2:32 PM UTC

Labels

type: document

Quip

Content Moderation: Spotlight Age-Gating

NOTE: This Quip is used for discussion and brainstorming. The MVP quip is [Age in Spotlight Ranking](#)

Overview

Spotlight aims to be a buttoned-up content feed that rarely has 'cringe' or 'gross' moments.

We want to build age-gating in Spotlight so that we are serving content categories to the appropriate age groups, and to set a foundation if we ever want to add in user-controlled content gating. We'll be approaching this on a content-level (indicating some content as not appropriate for some age groups) and on a creator-level (showing similarly aged creators to similarly age cohorts)

By building age-controls and making an external push with parenting groups, regulators, and safety partners, we can shift the external perception of Snapchat while serving our customers the content that they are more likely to engage with and find interesting.

Team

Sheet1

Design	PM	Localization	Engineering	Policy	Comms / Marketing	Customer Ops	Data Science	Privacy
[REDACTED]	Juliet Shen			Evan Geary No na Farahnik	Rachel Racusen	Althea Tupper Agatha Baldwin	FILL IN	[REDACTED]

Resources

- [Content Moderation: Content Controls \(WIP\)](#)
- **SCC** - Snapchat Content Category, a universal taxonomy at Snapchat for content understanding
- [List of SCC used in SnapGraph \(along with age category\)](#)

Goals

v0 Creator-Age and SCC-based Rules

v1 Risk-Based and SCC-Based

Independent of SCC-based age-gating, we should also explore risk-based age-gating. Similar to how we solved

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SNAP5350932



the Cold Start issue, we will use a combination of moderation history and account risk scores to further stratify tiers of creators and publishers that are mapped to age groups. This will allow creators and publishers to dynamically be served based on their behavior (similar to Cold Start, good behavior = more exposure to users) and the type of content that they publish.

A/B Tests

[Provide justification and KPIs for each treatment]

Metrics

Privacy Review

User Trust & Safety

User Safety Questions

Is there an opportunity for abuse to occur?

Can a user report abuse on this feature?

Can this feature be removed by the user? Disabled? Actioned by a customer support agent?

Has support-related tooling been built or tested?

[Please answer the questions above]

Accessibility Review

When we think about how to make our product more accessible, we are being kind, we are empowering users, and making sure every customer can use every part of our product. Let's leave no user behind by being kind, smart, and creative!

Questions For Design

[Please answer the questions above]

Questions For Engineering

These questions must be filled out by an engineer or engineering director two weeks before code freeze for the target release.

[Please answer the questions above]

SOX

Below this line is intended for projects that require SOX.

If your project doesn't require SOX feel free to ignore from here down 🙌.

SOX Testing

All changes should be appropriately tested with testing evidence provided here. This includes Engineering testing, User Acceptance Testing, and any required data validation testing. Link all testing evidence below (i.e., Quips, Tickets, Google Sheets, etc.)

[This UAT Tracking template](#) is for your convenience; if you can think of a better one for your project feel free to create and use it.

[Insert guide and examples for what level of testing would be required for SOX testing]

SOX Financial Approvals

All project financial approvals should be retained and kept here for documentation purposes. This includes above testing approvals and Final Go-Live approval by appropriate Business and Engineering leadership.

SOX Patent Approvals

Does this document describe a concept that is novel, non-obvious, and useful? If so, please fill out our [Patent Disclosure Form](#) or contact [REDACTED] on the IP team.

You can find more information about the Snap's Patent Program [here](#).

Zero Rating Partnership Review

Zero Rating is a special kind of partnership that mobile app companies like Snapchat negotiate with Mobile Data Service Providers (like Sprint, Verizon, T-mobile, Vodafone, Orange, etc.) Zero Rating makes our application "free" for users by omitting Snapchat data traffic from the mobile subscribers data plan. Users can enjoy Snapchat without using up their data quota. Learn more about Zero Rating [here](#).

We need your cooperation to make sure we don't introduce new domains with which Snapchat opens connections without notifying our mobile data service partners.

Questions for Engineering

These questions must be filled out by an engineer or engineering director two weeks before code freeze for the target release.

Once this section is completed and the spec is ready for review email [REDACTED] with a link to your PDR. The subject should already be set to "Zero Rating Partnership Review" and the body should contain "(Target Release and Link to Quip and Jira Ticket)".

Review Requester Information

Once the questions are filled and the email set, please fill in review request details below:

Review Results

Only Snapchat Infrastructure should fill in this section; if Approved, any future changes will require a new review.

That's it! Thank you for your efforts and dedication to our mission! 🍷

- **Serve people relevant and appropriate content and creators**
 - Justification: People typically want to see creators and content from their peers
- Success/KPIs: "Hide" and "Report" metrics, and customer contacts about irrelevant or inappropriately young creators, Engagement/exposure of content from young creators
- **Reduce exposure of inappropriate content to younger users**
 - Justification: When we know content contains something that is sensitive or could be inappropriate for teens, we shouldn't serve it.
- Success/KPIs: engagement metrics/view time on content tagged with age-gated tags with young users

Creator-Age

Based on a person's inferred age, we should limit the exposure of a young person's Snap to an older audience. This is to prevent someone in their 30s seeing a feed full of teenagers. The proposed matrix is a broad overview of whose content is shown to which cohort (as part of the recommended feed):

Sheet5

	A	B	C	D	E	F
1	Inferred Age	Shown to 13-17	Shown to 18-20	Shown to 21-24	Shown to 25-34	Shown to 35+
2	<13	No - Filtered	No - Filtered	No - Filtered	No - Filtered	No - Filtered

3	13-17	Yes	Yes - demoted	Yes - demoted	Yes - demoted	No - Filtered
4	18-20	Yes	Yes	Yes	Yes	Yes
5	21-24	Yes	Yes	Yes	Yes	Yes
6	25-34	Yes	Yes	Yes	Yes	Yes
7	35+	Yes	Yes	Yes	Yes	Yes

Questions from Ranking:

- does this apply to exploration or to scoring only?
 - both
- Are we okay severely limiting the distribution of all 13-17 year old creators?
 - sort of / maybe not / a little
- Apply this only for certain SCCs?
 - Do we differentiate between dancing and provocative dancing in SCCs?
- can we make it so if a Snap created by someone 13-17 has specific Tags that are “safe” can bypass Ranking demotions if it’s performing well across multiple cohorts? (JS)
 - Would prefer not to add lots of dimensions as it rapidly inflates complexity - [REDACTED]
- can we make it so if a Snap created by someone 13-17 that is performing very well can bypass Ranking demotions? (JS)

We need to create a way for high quality, appropriate content to bypass any hard filters or heavy demotions. If we see a Snap that is performing well across multiple age cohorts, can we automatically bypass Ranking demotions if engagement data is outside of the neighboring age cohorts?

SCC Tags

Since each human-moderated Snap gets tagged with SCC labels before it goes into Spotlight, we will categorize the SCCs and identify ones that should be age-gated. The age-categorization will be aligned to our content policies - for example, Snaps about Adult Content or Sexually Suggestive content will not be shown to users under 17+

The age-based rules will rely on “recipes” of tags. For example, if a Snap is about drug prevention it would be tagged as “Drugs & Alcohol” and “Educational” it would still be shown to younger users. If a Snap only has the “Drugs & Alcohol” tag, it will not be shown to younger users.

We will use the inferred age on the account since many young users set their age to be over 18.

Risk Score

Content Controls

To give users more power in determining what kind of content they are served, we can create a "Restricted Mode" (name TBD) within settings where users can opt-in. If the setting is activated, then we will only serve content with SCCs that are 13+ appropriate. This setting would need to take place across the entire app, specifically in For You, Ads, and in Spotlight.

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- (Before running any tests) what SCCs do each age group interact with the most?
 - View Time
 - Content that is being hidden or marked as "I just don't like it"

Open Questions

- Should this apply to Spotlight only or across the entire app?
- What happens when people start changing their birthdays?
- What is the risk of gating content for younger Snapchatters? Will it lead to a decrease in engagement?
- How do competitors gate content, if at all?
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Key Decisions

- Age-gating is limited to the feed only, not sharing
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- Does your feature have sufficient contrast? Use this [Contrast Checker](#) to confirm!
 - If your feature includes gestures, can it be accessed elsewhere via a button? For example, if a user is not able to swipe, can they still get to the feature using a different method?
 - Are all the UI elements focusable? Does all text and buttons have accessibility labels? Here are some resources as to how you can make them work: [Voiceover](#) (iOS); [Talkback](#) (Android)
 - Is there alternative text or descriptions available for any images in your feature? Here's how you can [add alternative text](#) to your images.
-

Sheet2

	Review Type	Reviewer	Date	Status	Notes
1	UAT - Complete (validating UAT happened...details in section above)				<insert link to test results, or link is in section above>
2	SOX - Engineering - Material Launch				
3	SOX - Finance - Material Launch				
4					
5					

- Will your feature create any new domains to which the Snapchat mobile application opens network connections? For example, when Snapchat introduced integrations with the Giphy, our client code began opening connections with media.giphy.com. **Not sure if your domain is new?** See our current whitelist [here](#).
 - [Yes/No]
- If yes to #1, what is the new domain, and what is the purpose of the new connection?
 - [Optional]
- Will your feature be served using QUIC? If your feature is setting behind a Google Load Balancer, then it most probably will be using QUIC.
 - [Yes/No]
- If yes to #3, what is the new IPs you will be using on your Load Balancer?
 - [Optional]

Sheet3

	Review Requester	Date	Notes
1			

Sheet4

	Review Type	Reviewer	Date	Status	Notes
1	Network Infrastructure				
2					

Metadata of Content Moderation: Spotlight Age-Gating

Thread class

document

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2021-10-06T00:20:39+00:00

Link

<https://snapchat.quip.com/COE2Ao7vbNM2>

Shared folders

Spotlight

Expanded users



DOCUMENT SLIPSHEET

Bates Number: SNAP5350932-SNAP5350960

BEGATTACH: SNAP5350932

ENDATTACH: SNAP5350960

Custodian: [REDACTED] ANDREOU_JACOB; APANOVYCH_MARIIA; BALDWIN_AGATHA;
BONIAKOWSKI_JEB; BOYD_NATHAN; BRODY_JACK; C [REDACTED] HAMMERSTROM_MORGAN;
[REDACTED] LEVENSON_DAVID; [REDACTED] LUE_DAVID; MURPHY_BOBBY;
OSBORNE_ALEX; PATEL_IMRAN; SCHRAEDLY_LAURYL; [REDACTED] SELLIS_PETER; SHEN_JULIET;
SIEGEL_JOSH; SPIEGEL_EVAN; SUNDARAM_SENTHIL; TRAN_ABBY; TUPPER_ALTHEA;
VOSS_JEREMY; YADEGAR_NONA; [REDACTED] ZICAFOOSE_KALE

Author: JULIET SHEN

Filename: CONTENT MODERATION_ SPOTLIGHT AGE-GATING.HTML

Create Date:

Last Modified Date:

TNAG BEGBATES:

TNAG ENDBATES:

MAAG BEGBATES:

MAAG ENDBATES:

File Path: /CONTENT MODERATION_ SPOTLIGHT AGE-GATING.HTML