

AMENDED Exhibit 960

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

Business Case: Chat Text Reporting

Overview

This document will cover a brief overview of chat text reporting, a first-ever in-app reporting integration on chat text messages on Snapchat. This UI refresh will bring in-app reporting to parity with other parts of Snapchat and make reporting abuse more intuitive. This will add new in-app reporting volumes for Trust & Safety review (upwards of x tasks/day), which is estimated to cost \$yM.

Documentation:

- [\[A/C Priv\] Improving In-App Communication Reporting](#)
- <https://snapchat.quip.com/M2aYAsiP0Rgw>

Product Owners: [Abby Tran](#) [Juliet Shen](#)

Engineering Points of Contact: [REDACTED]

Operations Points of Contact: [Matt Jackson](#)

TLDR; While chat media is reportable, chat text is currently not. We get feedback from customers, parents, legislators, and advocacy groups that abuse happens in chat text that goes unnoticed due to the lack of reporting functionality. We aim to solve this in a privacy-centric way.

Problem Statement

Per the [Harm Prioritization Framework](#) (in development) from Policy, we are focusing on areas that cause the most severe harm to our community through Chat, primarily **sexual grooming in child abuse** and **bullying**. As an example of the scale of the problem, Snap's Global Head of Safety was informed by the Swedish police that 80% of their grooming cases originated from Snapchat. During [our research for Family Center](#), parents told us that bullying was also a major concern. Teens took efforts to block bullies, but bullies were able to navigate around such restrictions through creation of other accounts or using another teen's account.

Volume Estimates, Finance Request, and Rollout Plan

^[S6] Trust and Safety currently receives [~6k unique reports on Chat Media/day with an average enforcement rate of 34%](#)¹, and [93% of known CSAM matches on Snapchat come from chat](#).

While Chat Media reports are actionable because there's media to provide context, reporting a specific chat text message has different challenges as the reviewer needs context to make a decision and chat text is much more common than chat media. ^[M21] For this reason, we are adding a multiplier of 20x to forecast potential volumes as we don't have a baseline to go off of.

We plan to first launch to Under 18 in 2022:

¹ Enforcement rate here means confirmation there's a violation leading to a content takedown

Page 1 Comments

- J1 [REDACTED] how much was approved in 2022 SSP for vendors?
Juliet Shen, 8/2/2022 02:04 PM
- J2 gentle bump
Juliet Shen, 8/16/2022 12:33 PM
- M3 @ [REDACTED] do you know?
[REDACTED], 8/16/2022 03:23 PM
- S4 ~ \$508K
[REDACTED] [REDACTED] 8/17/2022 05:31 AM
- M5 Thanks - Do you know what volume estimates that was based on?
[REDACTED] 8/17/2022 07:14 AM
- S6 In SSP we had about launching 300/day in Q1 building up to around 6.5k/day in Q4.
[REDACTED] [REDACTED] 8/22/2022 11:11 AM
- J7 need some kind of multiplier to try and forecast the potential volumes
Juliet Shen, 1/27/2022 09:39 AM
- J8 @ [REDACTED] I'm just throwing a ballpark out here for finance estimations, what do you think of a table forecasting 10x/20x/30x volumes compared to chat media?
Juliet Shen, 8/15/2022 07:55 AM
- J9 cc [REDACTED]
Juliet Shen, 8/15/2022 10:34 AM
- A10 @ [REDACTED] - Would you be able to give us a sense of what the chat text vs. chat media ratio of message types received is? Just want to make sure the broad estimate is in a reasonable range!
Abby Tran, 8/15/2022 12:52 PM
- A11 [REDACTED] - [REDACTED] was able to pull some data here and it does seem like the 10x, 20x, 30x are reasonable places to start since about 90% of chat media is "text" type. The 10x multiplier would be the most conservative case!
- S/O to [REDACTED]! <https://docs.google.com/spreadsheets/d/1ovdjMfNfDzZZqQ-i7ikrWrdFPJMoIRMpXltxCSS7nhg/edit#gid=616565773>
Abby Tran, 8/18/2022 10:51 AM
- J12 thank you [REDACTED]
Juliet Shen, 8/18/2022 10:56 AM
- S13 Hi folks, I updated the table with estimated monthly CW Headcount & HC Cost. The productivity assumption I took is the same throughput assumptions as account reporting (90/hour).
- @ [REDACTED] as we aligned last week for the 2023 SSP I have us building up to the 60K/day volume by March 2023 based on the fact we plan to only launch to U18 in Q4 this year.
- Just for my understanding so currently chat media reporting is about 6K/day. The 10x multiplier is based on the fact we have 90% more chat "texts"?
- CC: @ [REDACTED]
[REDACTED], 8/22/2022 10:42 AM

Page 1 Comments (Continued)

M14 Hi [REDACTED] thank you for this. I wanted to give you an ops perspective. This is a new workflow unlike anything the vendors have seen before. Furthermore reading and getting context from texts is going to take longer. We believe the TPH will be lower than reactive content (so <60-70). At least that is what we should plan for. Going with 90 is going to undercount the resources needed.

cc: [REDACTED]

[REDACTED] S [REDACTED]

Matt Jackson, 8/22/2022 11:20 AM

J15 Correct - also because the entry point to reporting a text (press and hold on chat) is more accessible than reporting chat media (open media from chat view, then press and hold. Not very intuitive)

Juliet Shen, 8/22/2022 11:46 AM

M16 Agree - I don't think we've ever reached 90 in any workflow.

[REDACTED] 8/22/2022 11:46 AM

A17 +1 - as Matt J said, we should assume TPH will be lower than for reactive content given the novelty and complexity of this workflow.

[REDACTED] 8/22/2022 12:08 PM

S18 I added in a 55 TPH scenario as well, not sure when/if there will be a meeting to review this but keeping both TPH scenarios in so folks can see the range.

[REDACTED] 8/24/2022 05:32 AM

M19 @ [REDACTED] For Visibility and awareness (Lower TPH forecasted for Chat Text Reporting)

Matt Jackson, 8/24/2022 11:14 AM

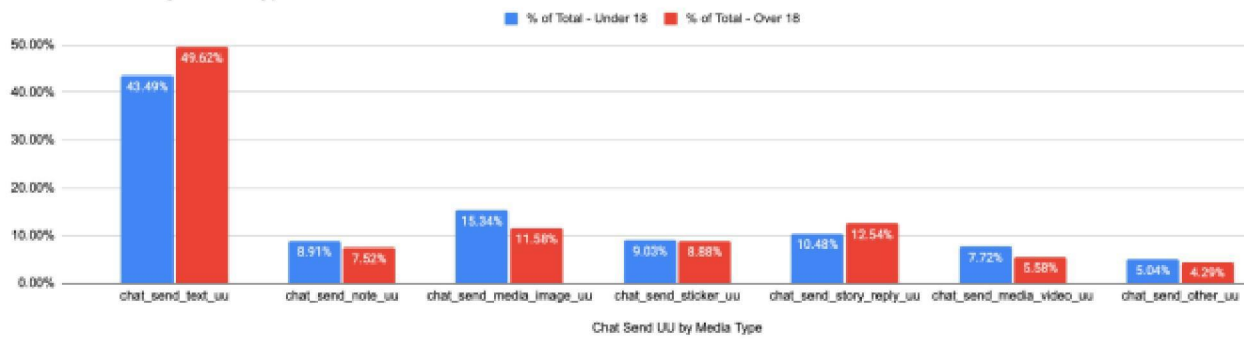
M20 Thanks Matt. Since it sounds like text reporting will be a large part of 2023 volumes, would it make sense to run a quick time study to get an estimate on how long these may take? Are there a few tasks or examples of chat reports we could use for this? In my experience, chat only reviews are much more challenging due to the lack of context and the nuances of certain languages, especially if we expect languages not supported by our vendor workforce.

[REDACTED] 8/24/2022 12:01 PM

M21 Is it possible that some of this volume is absorbed by a decrease in reports through other channels. Like someone getting a creepy chat text that they can't report today, may go and report it through the Account Reporting flow. When this launches, they will just report via the chat.

[REDACTED] 8/25/2022 02:47 PM

Chat Send UU by Media Type - Under 18 vs. Over 18 DAU



Estimated Volumes	Monthly Cost (no ramp included)
10x Chat Media (60,000)	~ 190 CW HC, ~\$0.627M (90 TPH) ~ 315 CW HC, ~ \$1.039M (55 TPH)
20x Chat Media (120,000)	~ 360 CW HC, ~\$1.118M (90 TPH) ~ 585 CW HC, ~ \$1.930M (55 TPH)
30x Chat Media (180,000)	~ 550 CW HC, ~\$1.815M (90 TPH) ~ 905 CW HC, ~ \$2.986M (55 TPH)

While we can use the current reporting volumes as a forecast for the finance request, we also plan to A/B test chat text reporting menu to a small % of users on a country-by-country basis to get a more accurate volume estimate as we start the rollout. This is expected to be a multi-month gradual rollout in line with operational and language capacity on Trust & Safety.