

H Reviews | June 2024 -- Youth [Small Group] [A/C PRIV]

A/C Priv - the contents of this doc are privileged and confidential, and reflect legal advice.

Note: this version is for small group async review ahead of H reviews June 10-11, 2024:

1. Leave comments in this doc for async discussion.
2. Comments will remain open on all docs, through the live reviews.
3. Use this [HYPERLINK "https://docs.google.com/document/d/1IaxynUlWEMwivf0IFilMnZ-6z3GPiT2NOrOxB6EQ8AM/edit" \l "bookmark=id.fwii8z57gsfj" \h] to highlight themes and discussion topics you want to suggest for synchronous time.

Goal + Strategy

Our goal is for Meta's platforms to grow their relevance, and be the leading platforms with future generations of youth. To achieve this, we have 4 Strategic Pillars:

1. **Regulatory Readiness:** Ensure Meta addresses existing youth obligations and is ready to meet regulations being passed in the near future defensibly while minimizing business and implementation impact.
2. **Youth Integrity:** Ensure we have effective mitigations for youth integrity risk from violating and age-inappropriate experiences.
3. **Legitimacy and Advocacy:** Ensure our reputational license to operate among policy audiences, parents, and consumers by demonstrating we are on the side of parents as they work to raise their kids and keep them safe – online and offline.
4. **Winning over Parents:** Ensure that parents choose IG (and in the future Quest) over Snap/TikTok and we approach YouTube levels of parental approval.

Summary

Youth continues to be one of the biggest areas of risk for the company - and our outlook suggests this will only increase in the future.

On the regulation front, there will be a patchwork of different laws in the U.S. and around the world that require age verification and parental consent for teens under 18. On the reputation front, Meta will continue to get the bulk of criticism from increased scrutiny around teens on social media, likely causing a severe decline in reputation.

To change this trajectory, This includes a big focus on Youth Integrity specifically. In addition to defense, we are launching an offensive public affairs campaign to improve our reputation on Youth, culminating with the launch of Teen Accounts on IG in August. Across the board, we have improved execution on our strategy by dialing in people and process (including a 2 month leadership lockdown, executive ownership of each priority, and weekly Youth Small Group meetings.)

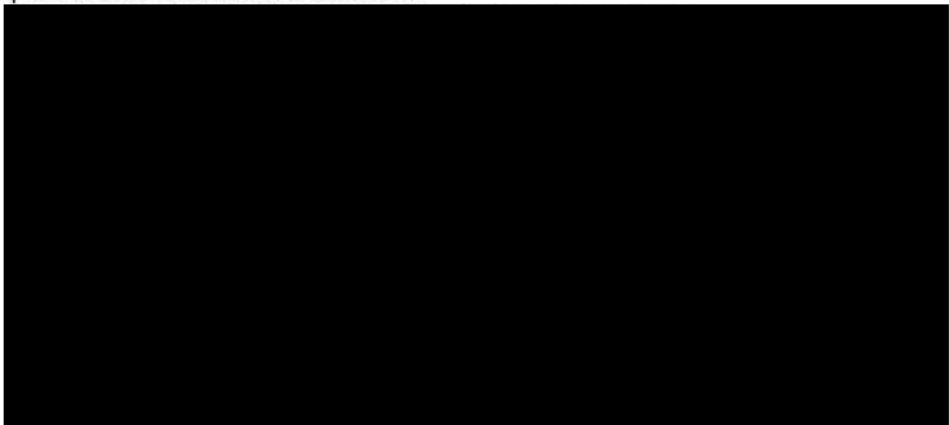
This is a multi-year effort. This year we are primarily focused on defense, but have our first offense efforts to demonstrate that we can improve our reputation with parents, consumers and policy elites, as measured by Parental Alignment. In future years, we hope to focus more on offense with the passage of OS level legislation in the US, improvements in our youth reputation relative to YouTube, and having the top products (IG/Quest) for teens in the US and globally (see Youth Company Milestones [HYPERLINK \l "_ja8re4wfhkeb" \h]).

Measurement

For H2, the key message we want to deliver with the youth initiative is that we are on the side of parents as they work to raise their kids and keep them safe both online and offline.

Our topline metric will be the sentiment metric *Parental Alignment*, measuring the percentage of parents that say our apps have aligned interests with them in supporting their teens. Our goal is to increase perceptions of alignment by among parents of teens from June baselines, as measured through an off-platform survey. will help us begin to separate ourselves from peers such as TikTok and Snap and begin to move more closely toward where YouTube is currently perceived. We will also track, but not goal on, Parental Alignment as perceived by general consumers and policy audiences.

In addition, we will also track whether we are making progress on showing adults the benefits of social media for teens, whether we are broadening the conversation on what factors are influencing teen wellbeing, and how comfortable parents are with their teens using our products and services. We will track three guardrail measures: (1) *teen app preference* and (2) *teen alignment* to ensure our apps remain relevant for teens and (3) a counter metric to ensure our motivations are perceived as continuous innovation.



1. Youth Regulatory Readiness (STO: Michel Protti, QB: Miki Rothschild)

H1 Recap

In H1 we made solid progress aligning on major strategic decisions and building compliance solutions to address an increasing number of youth laws coming into effect in the US and globally.

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- 1. **Meet new regulations.** We are on track to be deploy-ready in 9 jurisdictions (OH, EU DMA, FL, CA, OR, CT, LA, France, MS) with enforcement dates through July/August. This not only helps us respond to these 9 laws but also equips us with a set of product solutions that will help respond to future youth laws, as they all center around common requirements (such as Age Verification, Parental Consent & Supervision, Age Appropriate Default Settings, Data Use, etc.) with some local variations.

- 2. **Mitigate legal pressures.**

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- 3. **Launch Youth XFN review.** We stood up a new unified "[HYPERLINK "https://fb.workplace.com/groups/2468134800109855/posts/3769011020022220" \h]" to help drive consistency, visibility and rigor in managing Youth-related risks throughout the product development process across the company. This review is part of our Privacy XFN Review process, but includes enhanced monitoring and support for projects that may impact youth.

H2 Priorities

Our priorities for Youth Regulatory Readiness in H2 are to:

- 1. **Meet new regulations.** Over H2, we expect 11 jurisdictional youth related laws (LA, CA, OR, CT, MS, FR, TX, UT, MD, MT, ID) to come into effect and will continue to be deploy-ready by the enforcement dates. Additionally, once we launch parental consent in one of these jurisdictions, we'll need to launch parental consent in additional international markets with existing parental consent requirements (Chile, Uruguay, Peru, Ecuador, Colombia, Mexico, Nigeria, South Africa). After launch, we'll further optimize these experiences leveraging online data, and work towards more scalable platforms and processes to reduce the cost of compliance and maximize efficiency.

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2. Mitigate legal pressures.

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3. **Mature Youth XFN reviews.** We'll continue to tune the Youth XFN Review process to manage youth risks while increasing efficiency. This includes having robust metrics to evaluate 1) how effective our process is at catching risks and 2) how effective we are at minimizing negative impact on product development velocity.

2. Youth Integrity (STO: Guy Rosen, QB: Amit Bhattacharyya)

H1 Recap

In H1, we focused on improving our defenses for Youth across organic content, ads, and non-recommendable content and interactions. While we've always prioritized Youth issues within Integrity, we've lacked programmatic, holistic focus towards this segment. We are focused on closing this gap by executing against defensive initiatives aligned with high priority legal risks such as:

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Key

callouts from H1 include:

1. **Youth Organic Prevalence (Community Standards):** We made good progress reducing Youth prevalence, with a [REDACTED] reduction on Facebook ([REDACTED] [REDACTED] [REDACTED]) and [REDACTED] on Instagram [REDACTED] [REDACTED]. We also set goals to reduce specific violation types. Against these, Instagram is meeting 16 of 18 targets and Facebook is meeting 14 of 18 – we have a series of launches planned to further progress towards the goal within H1 ([HYPERLINK \l "_mu1ttt2mim7d" \h]).
2. **Youth Paid Prevalence (Ads):** In May we transitioned to a new metric "Paid Views Prevalence", that has greater coverage over policy violations than previous metrics. The effect of this measurement improvement is that prevalence is [REDACTED] than previously estimated. From a peak of [REDACTED], it is at [REDACTED] as of May 21st with levers launching in the next few weeks targeting [REDACTED] prevalence (bringing it lower than overall prevalence, which is ~6%).
3. **Youth Borderline + Non-Rec Prevalence:** On Instagram, we've reduced non-recommendable prevalence to Teens by [REDACTED]. On Facebook, we've operationalized Teen Borderline prevalence measurement and are now setting a reduction goal. We've seen issues on new user recommendations for Teens and expect this to be an area of focus going into H2.
4. **Unwanted Contact:** We launched changes to reachability settings, defaulting Teens into strict settings such that they cannot be contacted by unconnected users. Elsewhere, we identified limitations in our approach for Child Safety related feature-limits, e.g. lack of clear policy basis, lack of transparency, etc. We have now aligned across orgs on the go-forward plan which ensures a clear path for H2 execution. Additionally, we've launched protections for Sextortion (these will be the first of many), including nudity blurring for images received by Teens and warning messages for Teens sending nude images.

H2 Priorities

In addition to continued progress against the defensive work started in H1, for H2 we're adding more offensive work, e.g. blunter, aggressive product levers to reduce risks; rebooting a proactive gap finding team to find and fix issues quickly, etc. We're working across central and surface teams to deploy these levers in H2.

1. **Implement Age-Appropriate Content:** We'll continue reducing the prevalence of Community Standards violating content for Youth, aiming to bring this below overall prevalence levels as the next milestone. Additionally, we'll harmonize our borderline, non-rec and Ads policies to provide a simpler definition of age-inappropriate content. This will also allow us to be more effective in age-gating enforcement via human reviews in addition to automation.

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2. Mitigate Key Integrity Legal pressures:

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3. **Address parental concerns:** our key priorities are around Unwanted Contact between teens and adults (deploying aggressive levers including as part of Teen Accounts), sextortion and bullying & harassment issues. Additionally, we will explore measurement and mitigations for areas where prevalence may be low but there may be "concentration of exposure" (e.g. for suicide and self-injury or eating disorders, where users may seek out violating content).
4. **Product levers:** Building out sustainable, high-precision Integrity systems will take time. For our highest risk areas we intend to put on the table blunt, aggressive product levers or strong defaults (e.g., reducing messaging between certain countries, limiting ad inventory, etc.), which can immediately reduce risk. We will need support from the product teams to scope, explore and sometimes implement these while balancing product experience.
5. **Proactive gap finding:** We are rebooting a gap discovery program ("red team"), starting with child safety issues among others, with the goal of finding where bad content or accounts are easily discoverable, to inform immediate enforcement as well as feedback loops to our at-scale enforcement systems (e.g., new code words). We are building a sustainable staffing model so that we can persist this effort over an ongoing basis.

3. Legitimacy and Advocacy (STO: Andrea Saul)

H1 Recap

In H1, we focused on the topline metrics of 1) Maintaining our parental alignment metric, which has remained stable in the U.S. so far among parents of teens (████ in January vs. █████ in May – *not a stat sig difference*), and 2) Awareness of any IG supervision tools, which has been relatively flat in the U.S. among parents across the half at around ⅓ for any given tool, but we will monitor this as more GTM moments occur for IG teen safety products. Key highlights this half include:

1. **Drove major coverage of safety bundles and parent-focused support tools** to demonstrate our alignment with parents and investments in safety in advance of February's Senate Judiciary Hearing.
2. **Kicked off our 2024 "Screen Smart" series** with events in Denver, Charleston, Houston, and Boston. The events drew participation from local parent influencers and policy leaders (ranging from Colorado's Assistant AG to local PTA presidents). Initial performance of social content generated from parent creators exceeded our organic content creation benchmarks by █████ with █████ potential earned impressions, █████ Stories posts, █████ Reels or in-feed posts.
3. **Drove awareness for OS level policy push:** A U.S. Federal Marketing Campaign exceeded our goals (high income, news engaged parents message pull-through/HINE MPT █████ above goal) and earned media programs landed coverage of our federal proposal, including endorsements from WSJ Ed Board and key opinion leaders like Kevin Roose and Casey Newton.
4. **Launched an integrated "tools" focused campaign in India** to support policy objectives.
5. **Obtained leadership alignment on Youth Reputation strategy** and secured resources to further scale the campaign in H2.

It was also a half of continuously increasing intensity and external pressures, with key challenges including:

1. February's Senate Judiciary Committee hearing focused disproportionately on Meta and Mark's testimony.
2. Jonathan Haidt's book topped best seller lists and drove traditional/social media coverage even while the academic community questioned accuracy of research. (77 pieces of global coverage, with combined potential media reach of over 64 million globally – *lower than other major Meta-related cycles this year*).
3. Several bodies – especially in the U.S. – published advisories or research related to mental health (e.g., APA, AAP, US Surgeon General). In many cases, coverage has not been fair or neutral; inaccurately pointing a finger to social media.
4. Numerous Sextortion focused stories, including in national and broadcast outlets, with allegations leveled against Meta's platforms as key places for sextortion scammers to find and extort victims.

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5. Litigation news cycles continued, including local stories driven by school district lawsuits and national stories driven by Litigants PRIV

H2 Priorities

In H2, we will focus on executing the Youth Reputation Campaign to ensure our reputational license to operate among policy audiences, parents, and consumers. Our priorities for Legitimacy and Advocacy are:

1. **Be Tools Forward:** Expand activities, including in-app, “Screen Smart” parent creator events, and first-party marketing, that educate parents about our safety default / parent-controlled features and demonstrate Meta is on the side of parents.
2. **Advocate for & Passing Legislation:** Push for and pass a harmonized regulatory framework in the US and EU that requires OS/app store age verification and parental approval for U16 app downloads. In the US, push for passage of the OS level policy proposal in Louisiana and Ohio to establish a proof of concept and momentum for federal action.
3. **Broaden the Conversation:** Increase activities targeting policy audiences to drive a narrative beyond just social media. Additionally, highlight Apple’s anti-competitive behavior as it relates to youth. Advocating for the OS/app store federal legislation and EU-wide mandatory standards supports this workstream as well. Lastly, we’ll support a third-party coalition to highlight the complex array of challenges facing today’s youth.

We continue to anticipate significant headwinds and risks over H2, including:

1. Continuing to face global multi-faceted legal challenges that drive a negative media frame. Litigants continue to operate sophisticated media programs to keep lawsuits in the public conversation. A new DSA-led inquiry may shift the narrative focus to additional areas.
2. Rapid U.S. and EU legislative action is outpacing the development of the harmonized national legislation.
3. TikTok ban and election season may center attention on social media in H2.
4. Continued negative press around content issues (e.g., Jeff Horwitz/WSJ series on child safety, eating disorders/SSI stories).
5. OS store operators and proxies will begin to react more forcefully in opposition to our advocacy

4. Winning over Parents (STO: Max Eulenstein)

H1 Recap

Our primary focus for H1 within this area was aligning on the core product strategy for winning over parents on Instagram.

- In Q1, we finalized our overall goal metric of parental alignment, ratified the top parental concerns that we plan to address in tandem with Central Integrity and app teams, and completed the product plan for our core bet: Teen Accounts.
- In Q2, we’ve been focused on accelerating execution against that aligned strategy and we’re starting to see momentum, although there is still significant execution risk to the Teen Accounts launch, and open questions remain around how much we can move our north-star metric of parental alignment.
- In parallel to advancing the IG strategy, throughout the half Reality Labs continued to focus on execution to extend preteen accounts to be able to access Horizon OS social features as well as Horizon Worlds.

H2 Priorities

In H2, we want to shift into offense and build confidence that we can drive parental alignment. We will be hyper-focused on execution of launching Teen accounts on IG through August and will be extending the “teen account” system across Meta, while simultaneously learning which product updates have the largest impact on parental alignment so we can refine our strategy and update our roadmap. Focus areas include:

1. **Launch Teen Accounts on IG.** We will focus on Instagram through August to ship planned product updates for teens, while minimizing growth impacts and holding a high bar of user experiences. Teen accounts will include a simplified and safer teen settings experience that will require parental approval to change for early teens. We will continue iterating on Teen Accounts post-launch, we will look to learn and optimize for all teens based on what we learn following the launch.

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- 2. **Begin expanding Teen Accounts across Meta, starting with Facebook.** After August, we will expand our product updates for teens beyond Instagram and ship Teen Accounts on Facebook. We will prepare to migrate into a unified parental supervision experience with the Meta Accounts launch next April.
- 3. **Launch under-13 accounts on Horizon.** In H2, we aim to launch a cascade of social and content features across Horizon to preteens that access the platform via parent managed accounts. Parents will be able to manage settings like who has access to communicate with their child, and set Worlds content access standards.
- 4. **Improve understanding of parental alignment drivers.** Partnering with DSS, we will better understand what moves parental alignment so we can tailor future product launches and in-product marketing.

Discussion

- 1. Is our current plan sufficient to meet external pressures? If not, what will we need to do, and will it move the needle?
 - a. [Context] PRIV legal PRIV
 - PRIV
- 2. Do we have the right balance between protecting youth and making sure our products continue to be relevant to them?
 - a. [Context] We're already making big changes with Teen Accounts defaults – eg: defaulting all U18 to private accounts, strict messaging reachability, requiring parental approval to change U16 sensitive content settings. There's additional blunt measures we can take (such as hiding followers) but each additional measure also potentially reduces value for teens (e.g. discovering mutual friends/interests). What is our willingness to explore blunt product levers and be open to making more false positive mistakes?
- 3. Are there additional proactive advocacy efforts we should consider to help advance our OS/app store proposal?
 - a. [Context] For reference, the current efforts are outlined in [HYPERLINK \l "_bjp5xedq5331" \h]. Potential more aggressive tactics include (1) Provide an amicus brief defending Ohio's existing youth law (currently being challenged by NetChoice) to secure the OH Lt. Governor's support for an OS/app store bill in OH – key to getting OS/app store bill passed in OH in 2024 or (2) File first party advocacy/complaint with the FTC re: Apple's anticompetitive practices, alleging Apple harms youth safety and well-being online by refusing to share age-related information with apps in its app store, and highlight compliance with 2014 FTC Consent Decree necessitates they have this information.
- 4. For Feedback: how do we feel the new Central Youth people and process is going, are there ways we can improve?
- 5. Are there other product roadmaps related to youth that we should be aware of?
 - a. [Context] We are currently tracking; Gen AI Agents, WA Age Collection, Horizon launch to U13, IG features launching for Teens (e.g. Friends Map, Schools), Messenger Kids deprecation, Disappearing Messages (reducing parent visibility into Messaging). Anything we are missing?

Appendix

1. Youth Company Milestones

2024	2025	2026	2027	2028
Table-stakes/Defense	Win over Parents/ Offense	Win over IG Teens	Win with multiple products	Positive Impact
PRIV	PRIV	PRIV	PRIV	PRIV
Make meaningful progress in youth integrity risks	We have effective mitigations for youth integrity risk from violating and age-inappropriate experiences	Teens prefer IG to TT in US and globally, measured by DAU and sentiment		External beliefs that Meta's

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2H. Eating Disorders

- I. Improve measurement and detection precision/recall, then explore concentration of exposure opportunities.

XI
+IG/CSI

3. Legitimacy & Advocacy

3A. Demonstrate we can move parental alignment (+3 pts) *(Company Milestone Goal)*

STD: Andrea Saul

3B. Get legislation introduced at the state or federal level that requires OS/App Store age verification and parental approval for u-16 app downloads.

3C. Broaden the conversation by increasing the share of voice for devices.

4. Winning over Parents

4A. Demonstrate we can move parental alignment on IG, as a result of Teen Account launch

DSS/IG

STD: Max
Eulenstein

4B. Ship Project Nido on IG while minimizing growth impacts and holding a high bar for teen and parent experiences.

IG

4C. Make progress on Project Nido on FB while minimizing growth impacts and holding a high bar for teen and parent experiences.

FB+CSI

4D. Make progress on Project Nido on Messenger *[TBD - Placeholder pending alignment discussions]*

Mmgr+CSI

4E. Ship Salsa on Horizon Worlds

H2W

- I. Launch a cascade of social and content features across Horizon to preteens that access the platform via parent managed accounts

4F. Understand drivers of Parental Alignment

DSS/IG/CSI

- I. Better understand what moves parental alignment, so we can tailor future product launches and in-product marketing

3. Additional Youth Data

Regulatory Response Data

We will deploy a variety of interventions to meet jurisdictional requirements, including blocking interventions, as shown below. We will closely track (1) performance of product interventions we are shipping on meeting requirements and to user experiences, and (2) actualized business impact (DAU, MAU, Revenue) from meeting the enforceable requirements. The Table below shows requirements, market sizing (in MAU) and estimated impact (in MAU) from meeting requirements in the 4 jurisdictions with 7/1 enforcement date:

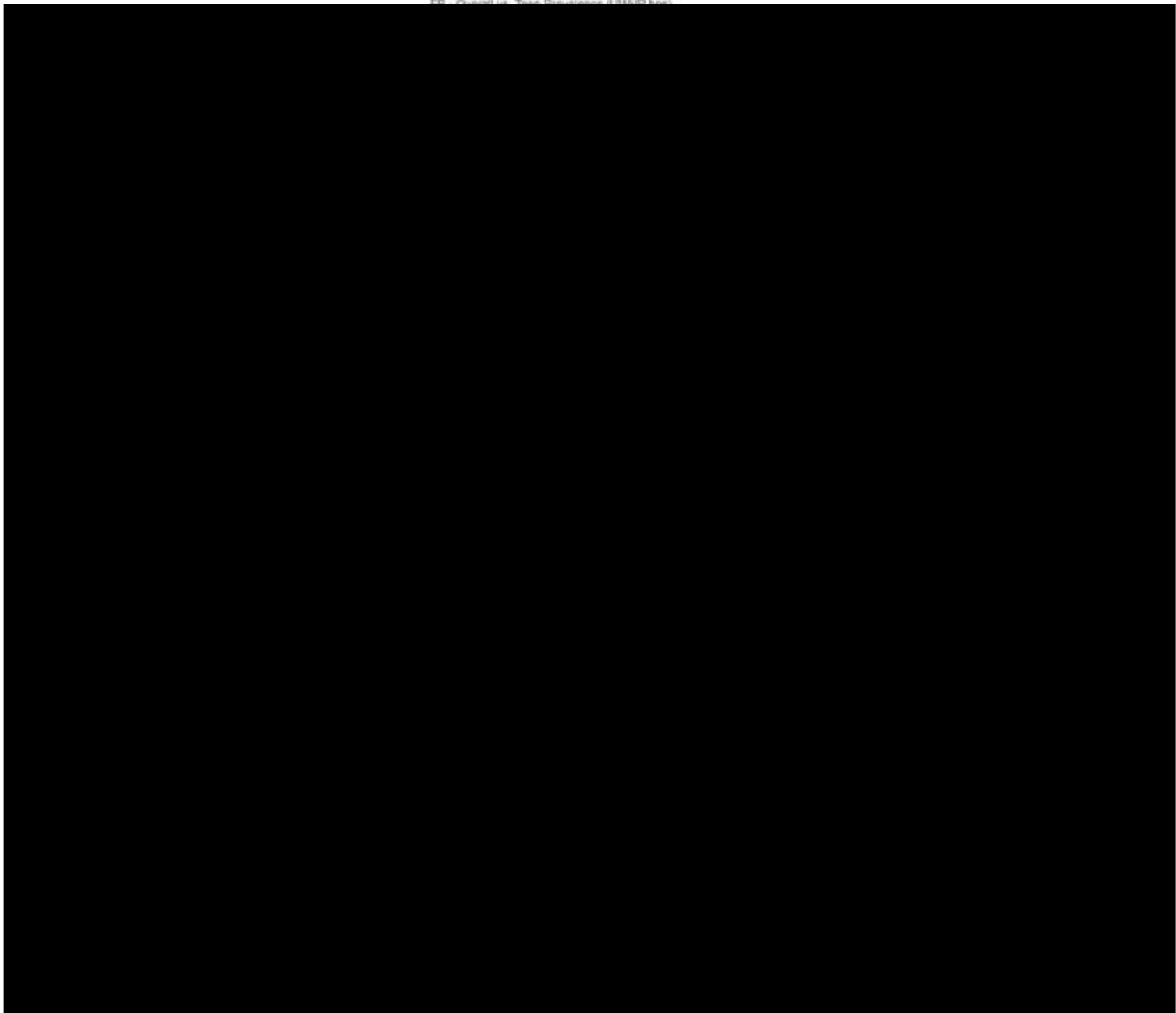
Jurisdictions with 7/1 enforcement	Requirements	Jurisdictional MAUs		Estimated MAU Impact from requirements*
		FB	IG	
Louisiana	- Age Verification - Parental Consent - Regulatory Supervision - Floor of Protection - Messaging Reachability	Overall: [REDACTED] Teen (Predicted + Stated): [REDACTED] Teen (Stated): [REDACTED]	Overall: [REDACTED] Teen (Predicted + Stated): [REDACTED] Teen (Stated): [REDACTED]	FB: ~ [REDACTED] IG: ~ [REDACTED]
Mississippi	- Age Verification - Parental Consent - Floor of Protection - Precise Geolocation	Overall: 2.2M Teen (Predicted + Stated): 140k Teen (Stated): 58k	Overall: 1.6M Teen (Predicted + Stated): 300k Teen (Stated): 120k	FB: ~ [REDACTED] IG: ~ [REDACTED]

Florida	- Regulatory Supervision - Youth Consent	Overall: [REDACTED] Teen (Predicted + Stated): [REDACTED] Teen (Stated): [REDACTED]	Overall: [REDACTED] Teen (Predicted + Stated): [REDACTED] Teen (Stated): [REDACTED]	FB: [REDACTED] IG: [REDACTED]
Connecticut	Regulatory Supervision	Overall: [REDACTED] Teen (Predicted + Stated): [REDACTED] Teen (Stated): [REDACTED]	Overall: [REDACTED] Teen (Predicted + Stated): [REDACTED] Teen (Stated): [REDACTED]	FB: < [REDACTED] IG: < [REDACTED]

*Wide error bars. Includes one-time hit and annualized MAU impact. Details can be found [HYPERLINK "https://docs.google.com/spreadsheets/d/1tPtQbx76iTz4lhFBj5va77wcPm8MS8_xu5W1F9ipgvg/edit" \l "gid=744402300" \h].

Youth Integrity Data

- Youth Organic Prevalence (Community Standards): [REDACTED] reduction on Facebook [REDACTED] [REDACTED] and [REDACTED] on Instagram [REDACTED] [REDACTED] [REDACTED].



4. Youth Policy Advocacy Tactics

CURRENT ADVOCACY TACTICS (US): To secure the passage of US federal legislation that would require OS/app stores to verify age and get approval from parents for those under 16 to download an app, we are deploying the following advocacy tactics:

US Initiatives		Key Dates / Timeframes
Workstream 2: Advocate for (and Pass Legislation)		
Federal Lobbying Efforts*	- Q2-Q3: Continue educating Hill offices and committees on proposal and identifying potential sponsors; coordinate in-district grassroots activations during district work periods. - Q4: Lame duck session; Navigate backlog of year-end bills to stop negative legislation and scope whether parental consent @ app store is possible on any must-pass legislation. - Q1 2025: Aim to introduce legislation and/or have our proposal added to legislation in the new Congress.	
State Lobbying Efforts*	- Ohio: Identify supportive legislators, gauging support from Lt. Gov (May-June). - Utah: Work with third-parties to introduce legislation during special session (June-July). - Defense: Continue mitigating potentially harmful bills (eg, NY, CA) while promoting pro-parental consent message. 2025 Planning: Lay the groundwork for proactive work in South Dakota, Florida, Texas (June - December).	
Grassroots & Grasstop Activations	- May-June: Directly recruit state / local advocates in 18 priority states, and determine ways each partner will activate. - May-July: Create state-based organizations that can run targeted digital ad campaigns and fund state-focused research. - May-December:Identify, empower and activate national advocates in support of parental consent at the app store level. - May-December: Identify parents to educate and activate in support of our policy principles. - June - December: Activate supportive third-parties (eg, op-eds, emails, social media posts, direct engagement, etc.); leverage third-party conferences, roundtables, events, and other opportunities to connect advocates with policymakers. - November-December: post-election 2025 planning. - TBD: Explore state-based coalitions of supportive third-parties in states where it will help move the needle.	
Safety/ x-Industry AV/PC Coalition	- Meta to confirm ICMEC’s position on AV/PC at OS/app store level and assess plans (Early May) (completed) - ICMEC to identify invitees, set date and location, and high level goals (Late May)(in progress) - ICMEC hosts x-industry and safety stakeholder convening to align on shared concept and next steps (Mid-June) - Develop and release x-industry statement and joint safety stakeholder statement (July-Aug) - Initiate activations to achieve advocacy goals, exact activations TBD: legislative proposal, testimony, op-eds,... (Sept-Dec)	
Workstream 3: Broaden the Conversation		
Apple Regulatory Program	Congress	- Q2-Q3: Engage Judiciary and Commerce committees educating staff re harm to hardware developers and knock-on effects to services and consumers (esp children) flowing from Apple’s anticompetitive conduct; explain connection between YWB legislation app store level proposal and Open App Markets Act (OAMA) type of legislation - Q3-Q4: [if introduced] Advocate for+raise awareness of benefits of Carmack OAMA-alternative app store legislation - Q3-Q4: Through third parties, raise awareness with Commerce committee members, Bipartisan Disabilities Caucus re FCC inquiry into AI x accessibility x hardware issues - Q4: Support Lame Duck advocacy
	DOJ	Q2-Q3: Direct other companies and third parties to DOJ for confidential briefings on harms to children flowing from Apple’s anticompetitive practices

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HIGHLY CONFIDENTIAL (COMPETITOR)
HIGHLY CONFIDENTIAL (ATTORNEY'S
EYES ONLY)

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	Q3-Q4: Through direct+third party advocacy, ensure Apple harms to hardware developers—and resultant harm to children—remains among priority items for DOJ in its litigation (in case of Lame Duck settlement, included in package)
FTC	- Q2-Q3: Bring 2014 FTC Consent Decrees against Apple to public light through <i>Epic v. Apple</i> litigation, other company amicus filings, or other mechanisms. Lay public record that Apple has the data and mechanisms already in place to quickly and easily comply with a mandate for parental consent and age verification at the app store, OR that it is violating its consent decree. - Q3-Q4: Advocate (directly and/or through third parties) that FTC investigate Apple's compliance with FTC's 2014 Consent Decree
FCC	- Q2-Q3: Propose that the FCC issue a Notice of Inquiry (NOI) focusing on Accessibility and New Communications Technologies, Applications, and Products (Accessibility and New Technologies). The proposed NOI would be aimed at exploring the potential of AR/VR/AI devices for people with disabilities, and how FCC could support improved accessibility of such devices. - Q4: Create public awareness of the impediment Apple's device connectivity procedures represent for AR/VR/AI technologies of tremendous importance to people with disabilities.
	Third parties: Support activities outlined above; additionally: - Q2: Assess feasibility and mechanics of third party activation for school year kickoff to check phones at the classroom door, e.g., slogan "Hang it up!" (put phone in phone tree by the door...) - Q3: [if green-lit] 3rd party activation <i>Hang it Up!</i> campaign; support campaign on social+earned media for 3rd parties/grassroots - Q3: Directly and through third parties place panelists at premiere September antitrust conferences re Apple anticompetitive practices; create/sponsor Harvard Law antitrust conference focused on mobile ecosystem competition issues – include session focused on YWB app store proposal / issues
App Developer Coalition	- Q2: Retain consulting firm, establish principles, build Coalition membership - Q3: (July-Aug) Work with Coalition members to develop and finalize concrete policy proposals and/or solutions frameworks for agencies and Congress; (Sept) Hard launch - Q4: Activations, policymaker and third party engagement; through dedicated communications, build steady drumbeat of owned+earned proactive media engagement; prepare for potential swift action in Lame Duck; lay groundwork for 2025 in various public policy forums, including speaking opportunities, targeted multichannel marketing, partnerships, brand building
Top-Down Tech Influencer Initiative (WIP)	- Get key tech luminaries (thought leaders/influencers) who have outsized impact on public discourse and support the OS/app store proposal engaged in public discussion of AV and PC, driving the message: <i>This is the "simple and obvious" tech solution.</i> - Potential approach: initiate (Naomi op-ed), cultivate (senior exec/tech luminary 1:1s and salon dinners), activate (op-eds, media engagement, Davos, Aspen Institute)

CURRENT ADVOCACY TACTICS (EU): To secure mandatory EU-wide youth regulation grounded in a OS/app store approach, we are deploying the following advocacy tactics in the table below.

EU Initiatives	Key Dates/ Time Frame
Workstream 2: Advocate for (and Pass Legislation)	
EU Lobbying Efforts*	Across all institutions: - Engagements at senior political level- Nick and Markus meetings with TB, VdL, VJ cabinets and commissioners - Engagements with DSA board- Digital Services Coordinators - Engagements with ERGA (board of media regulators) - EC: Engage with AV task force to influence upcoming EC youth guidelines - EC: YT campaign to broaden focus of enforcement - EP: Prepare to engage the new EP to include technical solutions into a law - push for an initiative report on AV - Build industry alliance among video gaming/app industry (e.g. Roblox, Playstation, Netflix, Snap)+social media at EU level - Participate in the ISO standards on age verification - Continue building alliance against French and Spanish solutions w/ the AV Services Providers Association and EUConsent

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HIGHLY CONFIDENTIAL (COMPETITOR)
HIGHLY CONFIDENTIAL (ATTORNEY'S EYES ONLY)

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- Continue leveraging Meta **EU Youth Forum**, **TTC Labs** and **CIPL** workstreams to deliver our narrative at EC taskforce+DPA levels

National Lobbying Efforts*

- Engagements both at senior political level and technical level, focused on (FR, SP, DE, IT, NL, DK); H2 focus: PL and CEE
- Influence the discussions on national youth laws to include OS AV and fuel debate towards harmonized rules at EU level
- Leverage upcoming EU Presidencies of Poland (H1 2025) and Denmark (H2 2025) to include youth protection as part of the official Presidency agenda
- Foster country alliances e.g. upcoming D9 meeting includes youth protection in the agenda
- Shape work of member states' govts+Digital Services Coordinators (local DSA regulators) to encourage OS level solutions
- Engagement with the Spanish DPA re EDPB AV guidelines
- Series of Meta led events with safety partners, academics and parliamentarians

Smart Reg/PRP

- Q2-Q3: Proactive Youth Regulation Programme: 1-2 day workshops with government officials in priority member states. Deep dive on product and regulatory solutions. Countries in scope: Germany, France, Italy, Denmark, Netherlands

OS Alliance

- Q4: Formal Industry Alliance - led at Brussels level to consolidate+mobilize broader industry advocating for OS AV solution

Details on EU approach for Workstream 3: Broadening the Conversation can be found [[HYPERLINK](#)

"https://docs.google.com/document/d/1wq0q-dcQxliWrlAX8oBEPgFVXu74_HTuIKSKjyFok9Q/edit" \ "bookmark=id.22303iv5ut05" \h].