

## **AMENDED Exhibit 200**

# **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

P0682.1

## <A/C Priv> Youth H2 2021 – 1-Page Planning [IG Leads Review]

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### Discussion Questions

**Cross IG Dependency.** To make Youth successful, key areas of Instagram will need to build age appropriate features. We've done a first pass at identifying dependencies on other teams, sizing them and looking at the required engagement model, in order to identify the most impacted teams. At the same time, we are planning to do a roadshow with each dependent team in the coming weeks as part of H2 planning through June, in order to more deeply scope each dependency and resolve it – through reprioritization or youth funding. Are leads supportive of the areas highlighted and approach towards planning (see details [here](#))?

**New Experiences.** We believe that in addition to building an age appropriate experience with guardian supervision we must build some sticky new features that are built for Tweens first in order to make the experience truly compelling to Tweens. We hosted a [design sprint to explore new experiences](#) that would be compelling to tweens in four themes: Connection, Identity, Play and Exploration. The team is debating between a light weight or a big change approach to new experiences at first launch. Do the leads have any initial input on how big we want to go when it comes to new experiences?

**Youth Working Model.** We are running Youth effort as virtual cross company initiative, as PG in IG. From a virtual cross company perspective, Youth is taking a broad view of Safety, Privacy and Well-being across the FoA, partnering with teams to deliver on specific deliverables to strengthen our position here, while also charting the path for an IG tween version. Are leads supportive of operating model?

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### Youth 18-Months Strategy Summary

#### Context:

Regulatory and competitive changes are forcing us to invest more and act quickly.

- **Regulation:** New and updated laws require higher standards for age verification, more stringent restrictions on profiling and personalizing ads, more private defaults, improved integrity solutions, and (in some instances) parental consent to access our platforms.
- **Competition:** Instagram is our strongest FACEBOOK offering for Youth, but Tik Tok is taking market share quickly and is now more popular than Instagram with US youth.
- **Nomenclature:** Kids (6-9), Tweens (10-12), Early Teens (13-15), Late Teens (16-Adulthood). Youth is collective name.

#### Vision:

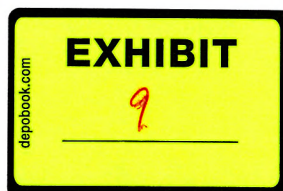
FACEBOOK builds the best experiences for Youth (kids, tweens, early teens, late teens) and guardians, ensuring they have the confidence in our privacy, safety, and data practices.

#### Strategy:

Establish the FACEBOOK apps as positive for young people and position us to serve the next generation of youth.

- Strengthen our position in youth safety, privacy and well-being by addressing major pain points in appropriate defaults for teens, better verifying youth age, better compliance on ads.
- Build an Instagram experience that responsibly introduces tweens to social media.
- Support Youth's social needs as they grow up by creating a fluid age up experience bridging FACEBOOK Youth products: Messenger Kids → Instagram Tweens → Instagram.
- Build a Youth Platform that provides a family solution to support young people's digital development within and across FACEBOOK products.

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## Milestones:

- Before June 30, 2021. Teen Well-being. New defaults and public commitments across Instagram and Facebook that prioritize teen safety, privacy, and well-being.
- Before December 31, 2021. Teen Well-being+. data use updates, and controls to ensure the data we use is in the teen's best interest.
- Before March 31, 2022. Under-13 Ship IG youth, along with Youth accounts and Family center, the best introduction for tweens to social media.

More Details: [Youth Canonical Doc](#)

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## Looking Back

We started pulling together the Youth initiative in February and have made fast progress, pulling in people and teams working in this space from across the company to bootstrap our efforts. In particular, we focused on (1) accelerating our efforts teen safety and privacy across FB/IG, (2) forming the product definitions for the Instagram tweens experience and (3) continuing to grow Messenger Kids people and engagement.

### Teen safety and privacy.

Age Verification. (i) Age Models: We are on pace to deliver on our U18 age model goals for country coverage expansion (p50 to get to coverage in FCI9+EU+Thailand) and delving into specific use cases on how the model can be applied effectively (ii) <A/C Priv> Age Reporting & Enforcement: We expect to fall short of our original H1 goal of eliminating the 2M backlog of underage report cases, due to slower than expected hiring of ops reps and continued increase in appeals (growing to 2.7M at one point in H1). We are investigating more aggressive automation levers to reduce the backlog. Due to the size of the backlog, we have been cautious to add new or improved reporting mechanisms and plan to launch only 1 of the 2 changes in our H1 goals. (iii) We are making considerable progress toward building prototypes for Face Based Age Predication and Social Vouching (two new methods for age verification). Despite a late start due to identifying proper team ownership and resourcing, we still have a stretch goal to deliver these two for internal dogfooding in H1. (iv) Lastly, we're having positive discussions around ecosystem wide solutions with 3rd parties including regulators, advocates (e.g. Baroness Kidron), platform owners (Apple, Google), and app developers (Reddit, TikTok, Twitter, etc). We plan to have follow up discussions focused on more details and options.

Settings & Defaults. On Instagram, (i) we began experimentation to encourage minors to select "Private" as their default setting (Deck) for new and existing users. (ii) We began experimentation for 7 initiatives to reduce IIC (Inappropriate Interactions with Children) by preventing "potential" violating adults from contacting minors in Reels, Comments, Suggested For You, Explore, and Follows. We expect launch both sets of initiatives by June 30. On Facebook, we are rethinking the overall default strategy, including the user experience for new users, existing users, and users at time when they reach adulthood (i.e. Age-up strategy).

Teens Ads. We explored different solutions for Teen Ads, including not showing ads, Enhanced SDS and Global SDS. We have learned that Enhanced SDS would require a large effort that would overlap with Basic Ads and would still fall short of the no-profiling protections needed for Youth, so with that in the short term we will expand SDS Globally, remove the Parental Consent flows and will free up the bandwidth of the teams to build Basic Ads that would provide the required protection mechanisms for youth in 2022. In addition we will also raise the age threshold for SDS to 18 where it was lower.

Instagram Tweens product definition. We aligned on the broad principles for IG Youth (i) build the tween experience within the IG app (ii) ensure that app looks visibly similar to tweens while making under the hood changes to make it age appropriate including onboarding and age up experience, parental controls, defaults, content standards and data privacy commitments, (iii) invest in a few compelling tween first new experiences that have the potential to be relevant to everyone. We built out a roadmap and identified dependencies with teams across FACEBOOK to partner with in H2. In addition we ran a design sprint to identify concepts for new experiences and will narrow down to a few to dive deeper into.

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Messenger Kids. Our mission is to empower all kids to safely connect with their friends and family through communication, creative expression and play. Messenger Kids is also a key surface in the broader FB Youth effort. We know that Messenger Kids is the first digital experience for many young people and MK is the introduction to our FB Youth product portfolio. We will enable a safe graduation path from MK to FB Youth product offerings such as IGY. H1 2021 has been a foundational half for MK. We established a new leadership bench, shipped our 2021 MK strategy in February and began our execution against this strategy at the end of Q1. Our 2021 strategy continues to be the north star for our H2 plans. On engagement, we are on track to hit our topline WAT goal (+2%) based on landing new activations, shipping new innovative messaging features and we are on track to ship our new UI 'Dawn' on mobile. On growth, we have confidence in our core growth levers around connected growth but experienced significant headwinds with PAXN owing to integrity challenges and external climate and so expect our growth impact to land in late H2.

There are two learnings since we've started the efforts that inform our path forward. First, the external scrutiny came faster and stronger than we anticipated due to the leak of the announcement of IG Youth. This means we had to accelerate our external engagement around our approach to teens and tweens, opening up additional headwinds for us. Second, hiring has been even tougher than we anticipated, especially for Eng and Snr Product leadership, given the competitive market conditions for talent. This means we have to more aggressively recruit internally in order to move faster.

## H1 2021 Goals

|   | A                                                                                                                               | B                                                                                                                                                      | C                                                                                                     | D                                                                                                            | E                                                                                                                                 |
|---|---------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|
| 1 | Goal                                                                                                                            | Goal Metric                                                                                                                                            | H1 Start                                                                                              | Target                                                                                                       | Curre                                                                                                                             |
| 2 | Age Verification: Ship predictive models for u-18 in prioritized markets and determine best solution for u-13 age verification. | (1) Age Model MAU coverage (p50)<br>(2) U-13 reporting Ops SLA<br>(3) U-13 In app reporting changes<br>(4) New Age Verification Solutions              | (1) 11%[IG], 22% [FB] MAU<br>(2) +1.8M backlog<br>(3) No In-App for FB, 7 Screen UX for IG<br>(4) N/A | (1) 20%[IG], 40% [FB] MAU<br>(2) 48 hour SLA<br>(3) Launch 2 changes<br>(4) Experiment / Dogfood 2 solutions | (1) On Tr<br>(2) +1.2<br>(3) Experim FB<br>(4) Design Review                                                                      |
| 3 | Settings & Defaults: Ship new defaults and higher classification thresholds to keep u-18 users safer.                           | (1) IG Safety defaults settings<br>(2) FB defaults settings                                                                                            | (1) N/A<br>(2) N/A                                                                                    | (1) Launch or experiment 70% of IG Safety Defaults<br>(2) Launch or experiment 50% of FB Safety Defaults     | (1) In Experi IG Default S for New U Prompting for Existing integrity saf<br><br>(2) Propo Strategy Defaulting Graduation setting |
| 4 | Youth Ads. Ship limited ads experience for u-18 as well as additional ads category restrictions.                                | Milestone: Shift youth profiling solution                                                                                                              | Highly personalized ads.                                                                              | In execution mode, on track for enforcement date.                                                            | Starting to e                                                                                                                     |
| 5 | MK. Grow Messenger Kids and build tools to help MK users transition to Instagram Youth.                                         | Launch new MK UI on mobile, MAU metric, begin development on a big bet on MK, fix top user issues, establish baseline PRE metrics, enforce mid-pri SLA | 5.9M MAU, testing new UI                                                                              | 6.16M MAU, launch MK UI on mobile                                                                            | 48K MAU, WAT                                                                                                                      |

## Looking Forward

Write 1-3 paragraphs summarizing your Pillar's top priorities in H2. What problems are you focusing on and why are you choosing the products/investments you're making? If your strategy is changing substantially from H1, say why. Cover your Pillar's most important goal(s) for H2 -- the one(s) that will bubble up at the PQ level.

Our focus for H2 is to (1) land the remaining Teen safety and privacy projects we started accelerating in H1 on FB/IG, (2) shift into execution when it comes to building Instagram Tweens getting to company dogfooding by end of half, (3) build and extend the Youth Platform to support IG Youth needs, (4) continue to grow MK while extending it to support IGD Youth and (5) build out a strong Youth foundation for FACEBOOK.

**Youth Safety, Privacy and Well-being:**

**Age Verification.** (i) **Age Models:** In H2, we will aggressively increase the coverage of our age models, build age band granularity for early and late teens, and pending leadership approval, we plan to begin building a U-13 model in conformity with legal and policy guidelines. (ii) **Reporting and Enforcement:** We will launch new products to make it easier for users to report u-13 cases and will reduce our backlog for U13 reports to a level where we can provide a 48 hour turnaround. We will also plan to stand up a new u-18 appeals process, which is critical as we build more age appropriate experiences. (iii) **Age Verification Experiences:** We plan to experiment on an entirely new end to end age verification experience for users, which will include Face Based Age Detection and other methods. (iv) **External Engagement:** We will continue making headway with key partners including regulators, advocates, platforms (Apple/Google) and app developers (Tik Tok, Twitter, etc) toward ecosystem wide age verification solutions.

**Teen Defaults.** On IG and FB, we will develop and align on an end to end strategy for safety and privacy defaults at the users time of registration through the time when the user graduates to adulthood. Across IG, FB, and IGD/Messenger, we will continue to experiment and launch new safety controls and defaults to protect minors.

**Youth Ads.** In H2 we plan to execute on the plans that were laid out in H1: Roll out Global SDS in early September. The majority of the work would leverage the pre-existing SDS implementation that was launched for GDPR. In addition, Basic Ads foundational work will be taking place in H2 2021. The H2 Basic Ads work is not specific for Youth but will lay the needed foundation for supporting Youth Ads in 2022.

**Instagram Tweens:** In Q3 we will build a prototype that includes tween account registration, new user experience, age appropriate content, parental controls, well-being defaults, feature gating and age up experience. In addition we will develop conviction on a few new experiences that are tween first and start prototyping. Finally we will do the foundational work to ensure that the tween experiences meet the appropriate data policy and legal needs. By the end of H2 we want to be ready for dogfooding the IG youth product setting up for a launch in H1 2022. We hosted a design sprint to explore new experiences that would be compelling to tweens in four themes: Connection, Identity, Play and Exploration. The team is debating between a light weight or a big change approach to new experiences at first launch and will form a stronger POV.

**Youth Platform:** Our primary focus for H2 is to support IG in building a Tweens appropriate experience with guardian supervision. This will include align on Youth Account and Identity strategy and structure and supporting IG Tweens onboarding with youth account and guardianship model. We'll also build an MVP of Family Center that's aligned with the requirements and value proposition for IG Tweens. Finally, secondary priorities for us in H2 are to deliver a guardianship model for Oculus Parental controls, with a launch milestone of Dec 2021; and to support U18 India consent requirements. We hope this will also be a milestone in preparation for using the same service for MK and IG. See [Youth Platform H2 plans](#) for detail.

**Messenger Youth:** A key priority for Messenger in H2 will be to enable IG Tweens. We are hoping to leverage the significant investment made to make MK COPPA compliant by using some of the messaging infra. Additionally, on MK specifically, we'll continue to further core bets around schools/communities, connected growth, onboarding simplification, messaging innovations, kid safety and app foundations - but will spend substantial time fortifying integrity efforts, shipping comprehensive integrity and kids safety solutions and supporting Youth efforts (youth account, family center, MK age-up, MK cross-app with IGD). We expect slower growth trends in H2 because of the continued tough external climate but this balanced approach puts us on a path to re-accelerate growth in 2022.

**Youth Ecosystem:** In parallel to our execution on the above workstreams we will continue to build a strong foundation for Youth efforts across FACEBOOK. In particular, we plan to enhance our understanding of Youth measurement & segmentation, which will include tracking and reporting of youth with granular age buckets, defining and measuring the northstar for Youth on FACEBOOK and continuing to more deeply understand Youth needs and behaviors through research and analysis. Additionally, we'll accelerate our external engagement by mapping the landscape of credible and influential entities in the Youth and Well-being domain and defining engagement models with them. Finally, we'll roll out guidance around Youth Standards & Privacy Review across the company, to ensure product teams across FACEBOOK can build U18 products and features with the best interests of the child from the outset.

**H2 2021 Goals**

|   | A                                                                                                                               | B                                                                                              | C                                                                                                                                           |
|---|---------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Goal                                                                                                                            | Goal Metric (if ready)                                                                         | End of H2: 50-50 Target (if ready)                                                                                                          |
| 2 | Age Verification: Ship predictive models for u-18 in prioritized markets and determine best solution for u-13 age verification. | (1) Age Model MAU coverage<br>(2) U-13 reporting Ops SLA<br>(3) New Age Verification Solutions | (1) 70% MAU [IG], 60% MAU [FB]<br>(2) U-13 reporting Ops SLA of 48 hours<br>(3) Experiment new Age Verification End to End experience on IG |

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|   |                                                                                                              |                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                          |                                      |
|---|--------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
| 3 | Settings & Defaults: Ship new defaults and higher classification thresholds to keep u-18 users safer.        | (1) New IGD/MSGR defaults<br>(2) New IG defaults<br>(3) New FB defaults                                                                                                                                                                  | (1) Experiment or Launch 2 new defaults<br>(2) Ship new IG default strategy. Experiment or Launch 2 new safety settings/defaults<br>(3) Ship new FB default strategy. Experiment or Launch 2 new safety settings/defaults                                                                                                                                                                                | Default definit sett<br>jourm from r |
| 4 | Youth Ads. Ship limited ads experience for u-18 as well as additional ads category restrictions.             | (1) Ads Profiling<br>(2) Age-gated content restrictions<br>(3) Age inference models for age-gating<br>(4) Transparency&Education                                                                                                         | (1) Rollout Global SDS 100% for U18 users - incl MVP Graduation Experience<br>(2) (pending Policy decision) Age-gate HFSS ads<br>(3) Begin to implement leveraging inference models for age-gated content<br>(4) Complete UX research; design & build age appropriate transparency pages and graduation consent flows                                                                                    |                                      |
| 5 | Instagram Youth. Build a version of the Instagram app designed for 10-12 year olds.                          | (1) IGY Privacy Commitments<br>(2) IGY Supervised Accounts<br>(3) IGY Age Appropriate Content<br>(4) IGY New Experience                                                                                                                  | Company dogfooding                                                                                                                                                                                                                                                                                                                                                                                       |                                      |
| 6 | MK. Grow Messenger Kids, support IG Youth DM and build tools to help MK users transition to Instagram Youth. | (1) US MAU (via new users and connected growth)<br>(2) eWAU (engaged weekly users)<br>(3) Weekly sends/senders<br>(4) Establish PRE metrics & infra migrations<br>(5) PMF for school communities big bet<br>(6) Fortify kid safety on MK | <These are WIP><br>(1) +90k - 111K MAU<br>(2) +20k - 40k eWAU<br>(3) +1 - 1.5% Senders & Sends<br>(4) RSYS/MSYS migration and PREQ baseline and opportunity sizing<br>(5) Launch country or city test for school communities in Q3 in order to validate PMF of big bet<br>(6) Establish partnership with CI to programmatically tackle abuse prevalence measurement & monitoring, improve parental queue |                                      |

## Resources Considerations

### Platform Dependencies

We identified dependencies across teams that aren't dedicated towards Youth for launching MVP of Instagram Tweens and grouped them based on the level of effort from the partner teams. The main dependencies are in the following areas:

Data Commitments: depending on IG:WB:Trust and central privacy for privacy aware infra.

U-13 Age Appropriate Content/Accounts: depending on IG:WB:Entity Quality Platform, IG:F&R:Relevance Integrity and Central Integrity teams.

Messaging: depending on Messenger Kids to deliver underlying COPPA compliant messaging service.

There are other small/medium sized dependencies where we need teams to prioritize projects during H2 or review work driven by the Youth team. Our plan is to do a roadshow as part of team level planning in the coming weeks in order to go in depth with each team, scope these dependencies and resolve on a case by case basis — either funding or through reprioritization. Once we complete this process we will have a review to discuss any unresolved dependencies.

IG Team Dependency & LOE (Red: Drive large problem area | Yellow: Prioritize projects in H2 Roadmap | Green: Support via Code Reviews) [details]

|   | A                                                                | B                                                                                                                                   | C                                                                         |
|---|------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|
| 1 | Product Area                                                     | Objective                                                                                                                           | Team Dependency Outside Y                                                 |
| 2 | Data Commitments                                                 | Make sure tweens data handling meets or exceeds our obligations and external expectations                                           | IG:WB:Trust<br>Central Privacy Infra                                      |
| 3 | U-13 Age Appropriate Content/Accounts Gating and Recommendations | Identify new U-13 content policies and enforce them across surfaces including recommendations by partnering with CI & surface teams | IG:WB:EQP (Primary)<br>IG:F&R:Relevance Integrity (Sec Central Integrity) |
| 4 | Messaging                                                        | Make sure tweens messaging data handling meets or exceeds our obligations and external expectations                                 | Messenger:MK                                                              |

|    |                                    |                                                                                                                                                             |                                                                                                          |
|----|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| 5  | Ads & Branded Content Restrictions | Ensure that we do not show ads to tweens as well as any content that is labelled as branded content.                                                        | IG: Biz                                                                                                  |
| 6  | Shopping Restrictions              | Ensure that tweens cannot make purchases without parental consent                                                                                           | IG: Shopping<br>IG: PF                                                                                   |
| 7  | U-13 Recommendations Cold Start    | New users - Account Recommendations, Explore Content, Reels Content for tweens to be age appropriate                                                        | IG: F&R<br>IG: Growth: Graph                                                                             |
| 8  | Content Partnerships               |                                                                                                                                                             | IG Partnerships                                                                                          |
| 9  | Onboarding                         | Enable Tween Account Registration on the IG apps/website including IG Account Creation Flow, Guardian / Child Relationship Data Models and Parental Consent | IG: Growth                                                                                               |
| 10 | Parental Controls                  | Provide the appropriate transparency and tools for parents in Family center and on IG.                                                                      | IG: WB: Privacy Experiences                                                                              |
| 11 | Privacy & Safety Defaults          | Modifying defaults to be appropriate for tweens and/or providing parents controls where needed                                                              | IG: WB: Teen Safety for small ch defaults                                                                |
| 12 | Well-being                         | Bullying thresholds<br>Daisy Defaults                                                                                                                       | IG: WB: Teen Safety for Small ch defaults<br>More changes may come and wo on product specification work. |
| 13 | New Experiences                    | Build 2 fun, new experiences for tweens                                                                                                                     | IGY Team does majority of new work                                                                       |

### Performance, Reliability, and Efficiency

Please describe how your pillar is prioritizing work on performance, reliability, and efficiency (all components of Craft). This can be a mix of improving existing systems or investments you are making to improve future products. PRE Planning guide here: [H2 2021 - Planning Guide for PRE](#)

- We have not put in enough code for us to start measuring any of this yet. Metrics for PRE need to be defined for IG Youth.
  - Q3 2021 Goal: define and measure the baseline for ProdInfra/Server Side with the first prototype. Subsequent analysis and improvement to follow in Q4.
  - Initial conversations with Production Engineering to involve them early for both efficiency and reliability concerns.
  - Leakage of features (Reliability): Since we are age gating, we do need to focus on making sure that there is no leakage of features (13+ to u13 or vice versa)

### Resourcing: People & Capacity

We have a lot of experience considering resource constraints as it comes to people/headcount and now need to consider our compute and storage budgets in the same way. Please flag cases where you might feel resource constrained next half.

- People
  - Ramp up: We have aggressive hiring goals and need to be mindful that a lot of the incoming hires will need time to ramp up
  - Incoming Hiring: There is significant demand and not enough supply in bootcamp, particularly at Senior levels (across roles) and for mobile engineers. This applies across IGY, Youth Platform and Foundation.
- Capacity
  - We expect we will need additional capacity in second half. Youth integrity needs are just getting defined and we plan to work with CI to figure out necessary investments. On IG youth side, depending on how aggressive we want to go on new experiences, it might require additional capacity when we go to production. Measurements for this to occur as part of the prototyping phase. On Messenger Youth, we will also need additional capacity to tackle encryption and tween messaging. Investments level will also need a minor boost in legal and other xfn areas.
  - We plan to do a concerted ask in Q3, once we have recruited towards existing budget, and also shipped some deliverables.

### IG Leads Review: Discussion Summary

Action Items:































