AMENDED Exhibit 347

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Meta-Kilstein-57
12/17/2024
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Meeting Goals

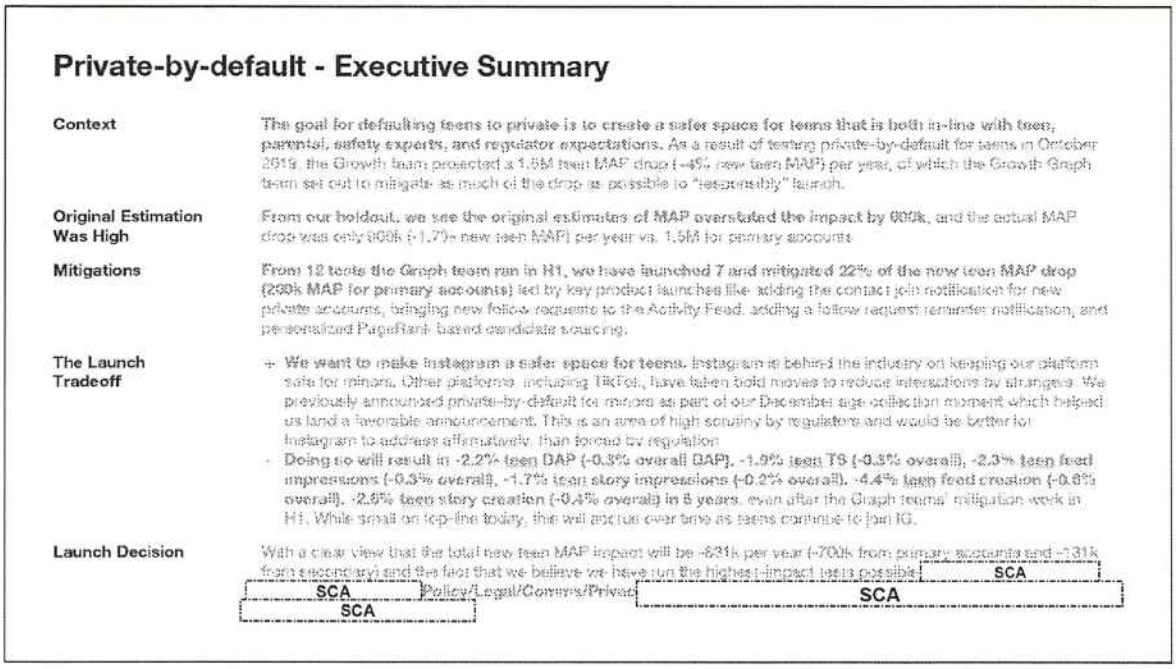
1. Review results and answer any questions on the impact of defaulting teens to private

1. Make go/no-go decision for the global teen private-by-default launch

Discussion Question	Are we comfortable launching private-by-default for teens with the identified retention and engagement drops?

Agenda

1. Problem Review
1. Default Teens to Private Test Results
1. Launch Options & Risks
1. Launch Decision



Private-by-default - Executive Summary

Context

The goal for defaulting teens to private is to create a safer space for teens that is both in-line with teen, parental, safety experts, and regulator expectations. As a result of testing private-by-default for teens in October 2019, the Growth team projected a 1.6M teen MAP drop (~4% new teen MAP) per year, of which the Growth Graph team set out to mitigate as much of the drop as possible to "responsibly" launch.

Original Estimation Was High

From our holdout, we see the original estimates of MAP overstated the impact by 900k, and the actual MAP drop was only 908k (-1.7% new teen MAP) per year vs. 1.6M for primary accounts

Mitigations

From 12 tests the Graph team ran in H1, we have launched 7 and mitigated 22% of the new teen MAP drop (250k MAP for primary accounts) led by key product launches like adding the contact join notification for new private accounts, bringing new follow requests to the Activity Feed, adding a follow request reminder notification, and personalized PageRank based candidate sourcing.

The Launch Tradeoff

- We want to make Instagram a safer space for teens. Instagram is behind the industry on keeping our platform safe for minors. Other platforms, including TikTok, have taken bold moves to reduce interactions by strangers. We previously announced private-by-default for minors as part of our December age collection moment which helped us land a favorable announcement. This is an area of high scrutiny by regulators and would be better for Instagram to address affirmatively, than forced by regulation
- Doing so will result in -2.2% teen DAP (-0.3% overall DAP), -1.9% teen TS (-0.3% overall), -2.3% teen feed impressions (-0.3% overall), -1.7% teen story impressions (-0.2% overall), -4.4% teen feed creation (-0.6% overall), -2.6% teen story creation (-0.4% overall) in 5 years, even after the Graph teams' mitigation work in H1. While small on top-line today, this will accrue over time as teens continue to join IG.

Launch Decision

With a clear view that the total new teen MAP impact will be -831k per year (-700k from primary accounts and -131k from secondary) and the fact that we believe we have run the highest-impact tests possible

SCA SCA Policy/Legal/Comms/Privac SCA SCA

Review

Final MAP drop (primary+secondary): These are estimates based on global MAP numbers and teen population in the countries vs. global.
FCI teens: 308K per year
US teens: 57K per year

Launch Options & Recommendations

Decision 1 - Do we believe there's more meaningful work we can do to mitigate the teen MAP drop?

No More Mitigations

Growth Team Recommendation
(limited room for further mitigation and not worth US DAU work tradeoff)

Retention:
- DAP: -0.3% topline in 5 years (-0.02% today)
- Teen DAP: -2.2% topline teen DAP in 5 years

Engagement:
- Overall TS: -0.3% topline in 5 years (-0.02% today)
- Feed impressions: -0.3% topline in 5 years (-0.01% today)
- Story impressions: -0.2% topline in 5 years (-0.01% today)
- Feed creation: -0.6% topline in 5 years (-0.05% today)
- Story creation: -0.4% topline in 5 years (-0.03% today)

Invest Further In Mitigations

New notif to uprank PSID teens to existing users
- Uprank PSID teens in models
- Improve in-feed follow request unit

Retention (compared with no more mitigations):
- DAP: +0.05% topline in 5 years
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Engagement (compared with no more mitigations):
- Overall TS: +0.03% topline in 5 years
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- Feed creation: +0.08% topline in 5 years
- Story creation: +0.04% topline in 5 years

Decision 2 - Given the tradeoffs, do we launch private-by-default for teens?

Launch Now

Policy/Legal/Comms/ Privacy/Well-being Teams Recommendation

PRIV

Don't Launch (Now)

Growth Team Recommendation

PRIV

Why should we default teens to private accounts?

1. **Will Increase Teen Safety:** Defaulting teens to private will help prevent high severity actions such as child grooming and inappropriate contact with minors. As a result of defaulting to private, private account adoption increases by 5.5x for teens, making it harder for bad actors to discover and message them.
2. **In-line With Teen User Expectations:** Parents and teachers often warn teens to avoid "creepy older people on the internet." Because of that, most teens prefer private accounts and wish to see privacy controls during onboarding." (First 14-days research from Yuqian)
3. **In-line With Parent Expectations:** Parents are worried about the security and privacy of information and who can contact them/their teens. While parent usage of Instagram is relatively low, they are aware of private accounts and said it limits the number of strangers that can reach out (Talking about Safety Research from Wendy).
4. **In-line With Regulator Expectations:** Providing additional resources and protections—such as private-by-default—for teens will strengthen many of our legal and policy positions across multiple jurisdictions as they relate to the processing of the data of minors, and may soon be required in some countries.
5. **In-line With Safety Experts' Expectations:** Safety partners and civil society groups regularly flag for us that defaulting teens to private accounts is necessary to give them a safe onboarding experience to our platform.
6. **Previously Announced Externally:** We announced this as part of our age collection moment in December 2019. The inclusion of the safety rationale for collecting age helped us land this favorable in press and avoid criticism that this was a move solely intended to help with ads targeting. We've also discussed with third-party policy partners (e.g., Anti-Bullying Association in UK, Unilever 5Rights Foundation)
7. **Decreased Follows from Growth Hackers:** By defaulting teens to private, we decreased # teens with inbound follows from Growth Hackers by 24% and # growth hacker follows by 25% during their first 7 days on the platform.

Review

Why aren't tags, mentions, and DM reachability a part of defaulting teens to private?

1. **Well-being and Community made the decision to treat visibility, discoverability, and interactions are separate constructs for teen safety.**
   a. **Visibility** relates to private accounts
   b. **Discoverability** relates to the account being discoverable by others
   c. **Interactions** relate to how an unconnected account can tag, mention, or DM you.

1. **Tag and mention opt-in settings were shipped in H1 to help prevent bullying and DM reachability settings are launched in certain markets.**

1. **After considering default strategies for interaction settings, ultimately Well-being and Community decided to leave as opt-in because of analysis showing significant value with current defaults.**
   a. Approximately 50% of 1:1 DM requests sent to new users in their first fourteen days on Instagram lead to the sender following the recipient at the end of the first 4 weeks.
   b. This means DMs from unconnected accounts are an important way that new users make connections Note on DM reachability insights.

Skip in discussion

When we default teens to private accounts, we are successful at nudging new teen users into the safer private accounts on Day 1. By making the selection more obvious/defaulted and seeing a spike in adoption, this also aligns with our research finding that most teens prefer private accounts to prevent strangers seeing their personal info and content.

+5.5x

More teen users are private vs. control by end of Day 1 overall (Android & iOS)

61%

of overall new teen accounts in test choose to be PRIVATE in NUX

63%

Primary Accounts

52%

Secondary Accounts

Public vs. Private choice in NUX in our test "Private" is defaulted

We are successful at dramatically increasing the number of private accounts on Day 1 for teens.

Query: https://fburl.com/daiquery/p202ava6

As a result of defaulting teens to private, we see decrease in retention and engagement which will compound over 5 years.

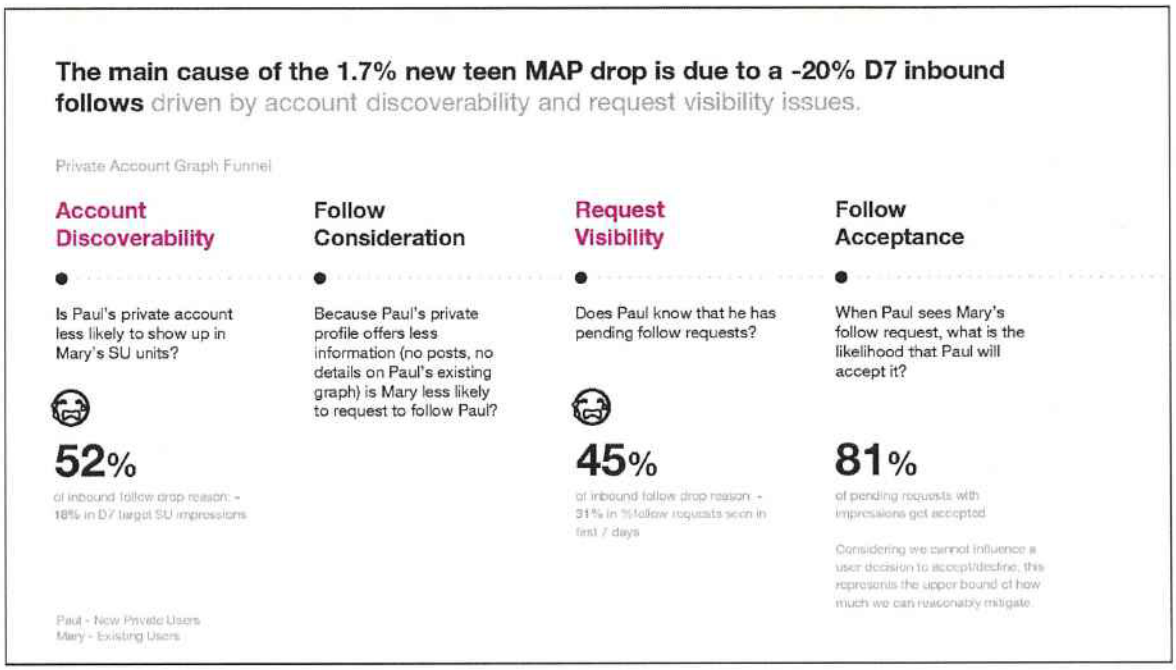
1. **Teen MAP drop due to inbound follow drop:** With mitigations shipped by Graph Product and Graph Ranking, we estimated that the total teen MAP impact will be -831k per year (-700k from primary accounts and -131k from secondary) from defaulting teens to private.
   - -1.6% New Teen MAU
   - FCI teen MAP: -308K per year
   - US teen MAP: -57K per year

1. **Engagement Drop:** We also saw negative impact in engagement metrics as a result of defaulting teens to private. However, the overall engagement impact was from drop in DAP, NOT in events per DAP (except production).

Metric (Test vs. Control)	Topline Today	Topline in 1 Year	Topline in 5 Years	Topline Teen Impact in 5 years
Overall DAP	-0.02%	-0.06%	-0.3%	-2.2%
Overall Time Spent	-0.02%	-0.05%	-0.3%	-1.9%
Overall Feed Impressions	-0.01%	-0.06%	-0.3%	-2.3%
Overall Story Impressions	-0.01%	-0.05%	-0.2%	-1.7%
Overall Feed Creation	-0.05%	-0.12%	-0.6%	-4.4%
Overall Story Creation	-0.03%	-0.07%	-0.4%	-2.6%

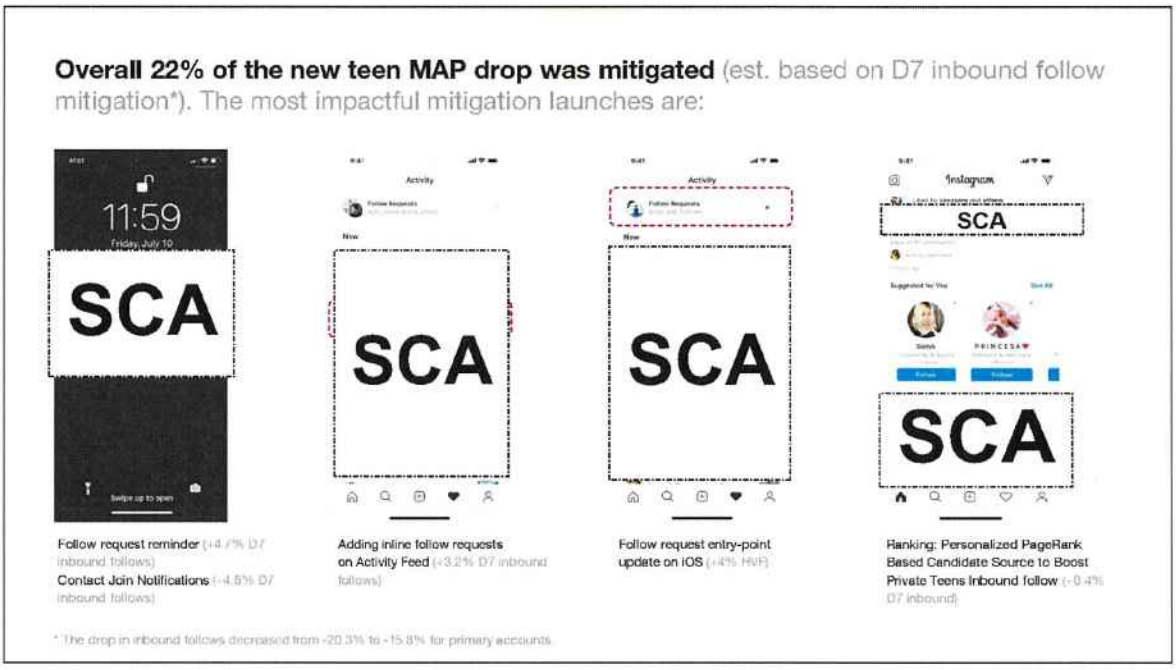
1. Currently, teens are 14% of DAP. As new teens continue to join and grow as a percentage of users, we expect these numbers to grow over time.

[redacted] to cover - However, that comes with serious growth and engagement decreases, even after a half of launching 7 tests to mitigate loss.



[redacted] - The loss is mainly a result of a loss in H7 inbound follows, which is a result of account discoverability, these new PBD teens not showing up in others' SU unites, as well as request visibility, these new teens not being aware of their follow requests.

The 81% follow acceptance rate also represents an upper bound of how much we can realistically mitigate because these are follows that if private, would be inbounds, but as a result of being private, don't get accepted.



[redacted] - I won't go into depth here but the team ran 12 tests and launched 7 across graph and notification teams, resulting in a 22% MAP mitigation.

No ib follow gain for PBD teens in the follow request entrypoint QE:
since we are testing on all private users, we get very little exposure to new private users to see any stat sig movement during testing phase
from a recent finding, < 10% of new teens are on iOS, so we don't expect to see stat sig movement for this target group in our tests

However, we were able to drive some positive engagement impact for PBD teens (primary accounts) via our efforts.

Teen story media imp from reciprocal follows in 5 years

+10.4%

-11.4% (Original Impact) -> -1.3% (After Mitigation)

Teen media imp from friends & family in 5 years

+9.2%

-13.7% (Original Impact) -> -4.5% (After Mitigation)

Teen feed time spent in 5 years

+1.1%

-2.3% (Original Impact) -> -1.2% (After Mitigation)

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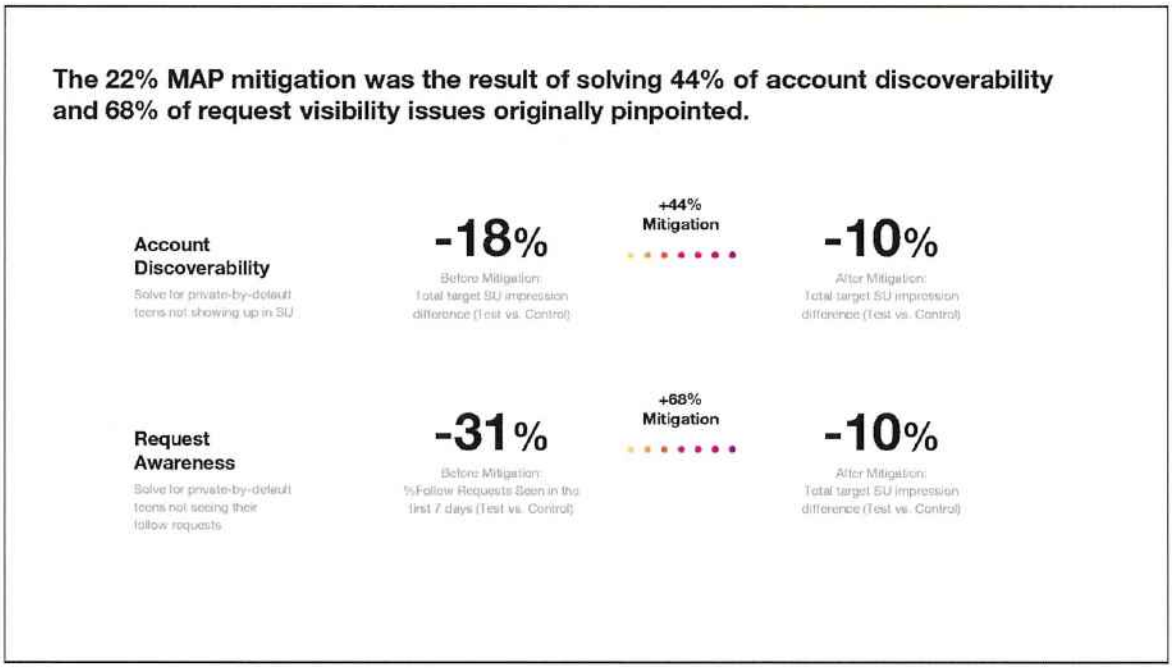

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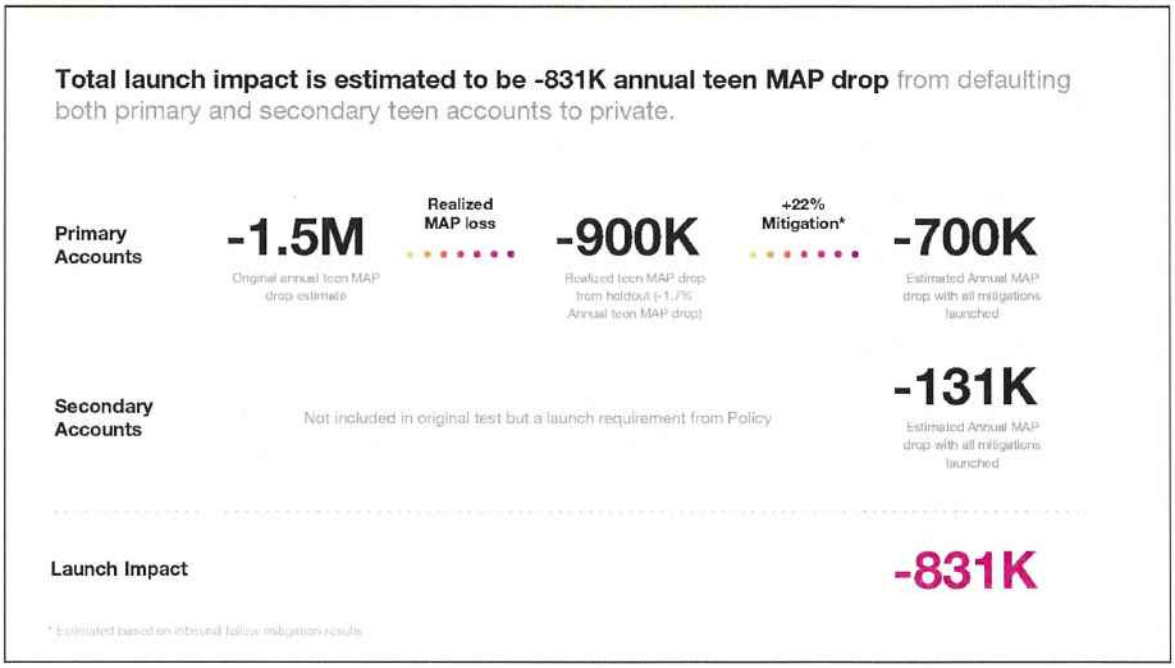
Sizing document: https://fb.quip.com/ex5LAtf2IP6s
Potential reasons for the initial MAP drop difference:
User ID based test vs. Device ID based test
Size based on MAP directly vs. transfer function
Original understanding was based on ~1 mo of data vs. new sizing based on more than 2 mo of data



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Overall, launching PBD for teens will lead to -831k drop in teen MAP and on the following slide, you'll see the drop in overall enagement as well.

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Potential reasons for the initial MAP drop difference:
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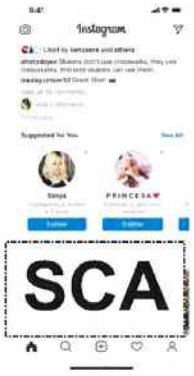
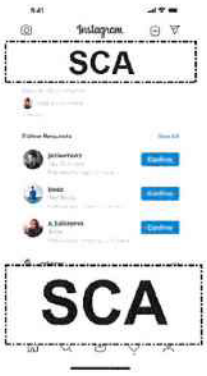
If we were to invest further in mitigating the effects of defaulting teens to private, we'd recommend iterating on notification, ranking, and product work over the course of H2, which could have +12% more new teen MAP mitigation impact.

Test new user graph notification to highlight teen accounts (to be tested in H2 from Ranking Services)

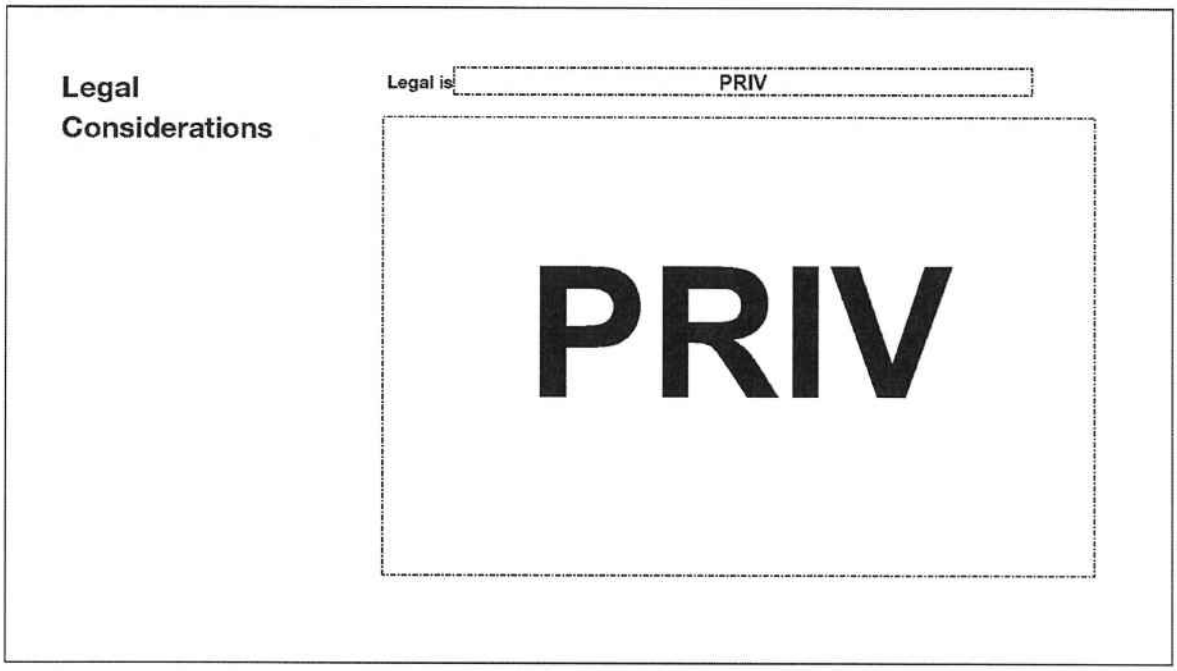


Force upranking PBD teens



More aggressive feed ranking of in-feed follow requests

[redacted] - There is more that we could do, but we don't believe there's much more juice left to squeeze here.



[redacted] to review

Comms Considerations

We have previously announced this update in December as part of our age collection announcement and have discussed since then - reversing course will harm our credibility with press and external stakeholders.

Additionally, we're seen as being 'behind' our competitors - especially TikTok - in youth safety. For example, they do not allow anyone under 16 to receive direct messages. As we advance our commitment in Reels, this may become even more apparent in external narratives.

As part of our Age Collection announcement (December 2019), we said, "in the coming months, we will use the birthday information you share with us to create more tailored experiences, such as education around account controls and recommended privacy settings for young people."

- This announcement resulted in 40+ press articles that noted this commitment as well.
- Including this in the announcement helped us land Age Collection favorably and avoid press characterizing it as a move solely directed at improving ads targeting.

[redacted] to review

Safety Partner Considerations

We have repeatedly heard from safety stakeholders that moving to private by default for teen accounts is the safest experience we can offer.

"On Instagram, user profiles are set to public by default, meaning anyone can see the users' profile and posts... If a child's profile is set to public on Instagram, they are at an increased risk of being identified and contacted by other users, who may wish them harm... By default, a child's profile and photos should only be viewable to their friends."

– *Baroness Beeban Kidron OBE, Founder & Chair, 5Rights Foundation*

"Really support this move... this opens up the possibility of enabling additional protections for young users. For example... we would strongly recommend default private settings for all users... this is the only way to ensure that all children using the service are aware and in control of their privacy setting, and we know from our work in schools that currently children are not always clear about this."

– *Will Gardner, CEO, Childnet International*

Well-being recommends this as a meaningful launch with 3 types of positive impact for Well-being:

1. Reducing bad experiences and harm in aggregate (ie. improving WB metrics)
2. Preventing or mitigating portions of high-severity incidents (ex. YesJuliet)
3. Legitimacy with people and stakeholders (regulators)

This recommendation is based on Well-being considerations, including people's expectations (#3).

Well-being metrics for bad experiences -5% for new teen accounts in the test (caveat: -2.2% DAP drop should decrease WB metrics)

Category	Metric	% Change	Confidence Interval	Definition
Self-Remediation	Block	-5.11%	±0.52%	
Self-Remediation	Restrict	-4.16%	±1.2%	
Self-Remediation	FRX Flow Start	-2.49%	±2.13%	Feedback and Reporting Experience: Feedback Starts
Self-Remediation	Reports	-5.80%	±5.43%	
Direct	Direct Requests	-10.80%	±0.97%	Pending inbox messages from unconnected accounts.
Direct	Allows	-10.06%	±0.95%	Allow sends a Direct Request into the inbox.
Direct	Declines	-3.70%	±7.59%	Decline a Direct Request.
Direct	Direct FRX Flow Starts	-5.75%	±1.90%	Feedback and Reporting Experience: Feedback Starts in Direct
Comments	Media Owner Deletes	-3.73%	±3.35%	When media owner deletes comments on their media.

Analysis details: https://fb.quip.com/b55CAqTBnkbl#LBFACAeMW5v

Launch Options & Recommendations

Decision 1 - Do we believe there's more meaningful work we can do to mitigate the teen MAP drop?

Decision 2 - Given the tradeoffs, do we launch private-by-default for teens?

No More Mitigations

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(limited room for further mitigation and not worth US DAU work tradeoff)

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Policy/Legal/Comms/ Privacy/Well-being Teams Recommendation

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Don't Launch (Now)

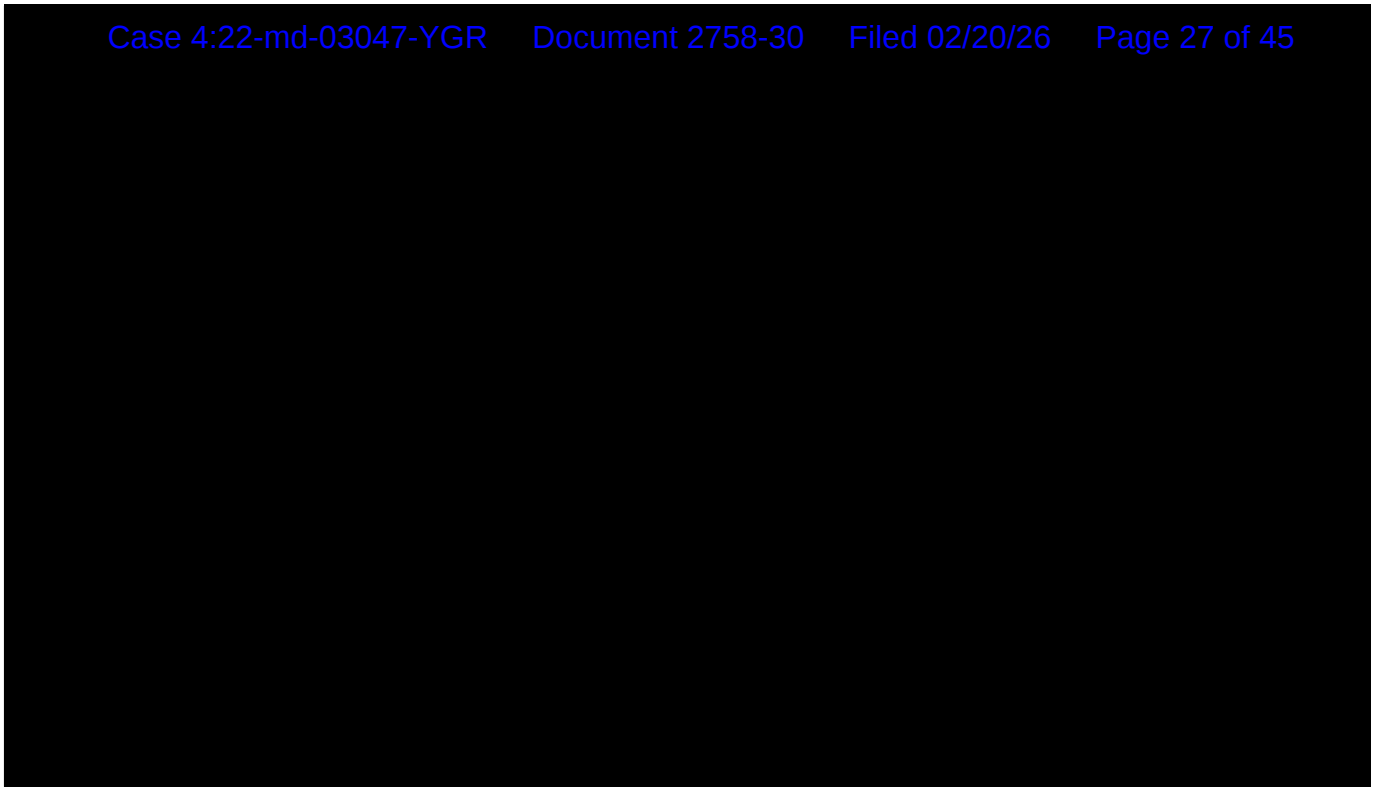
Growth Team Recommendation

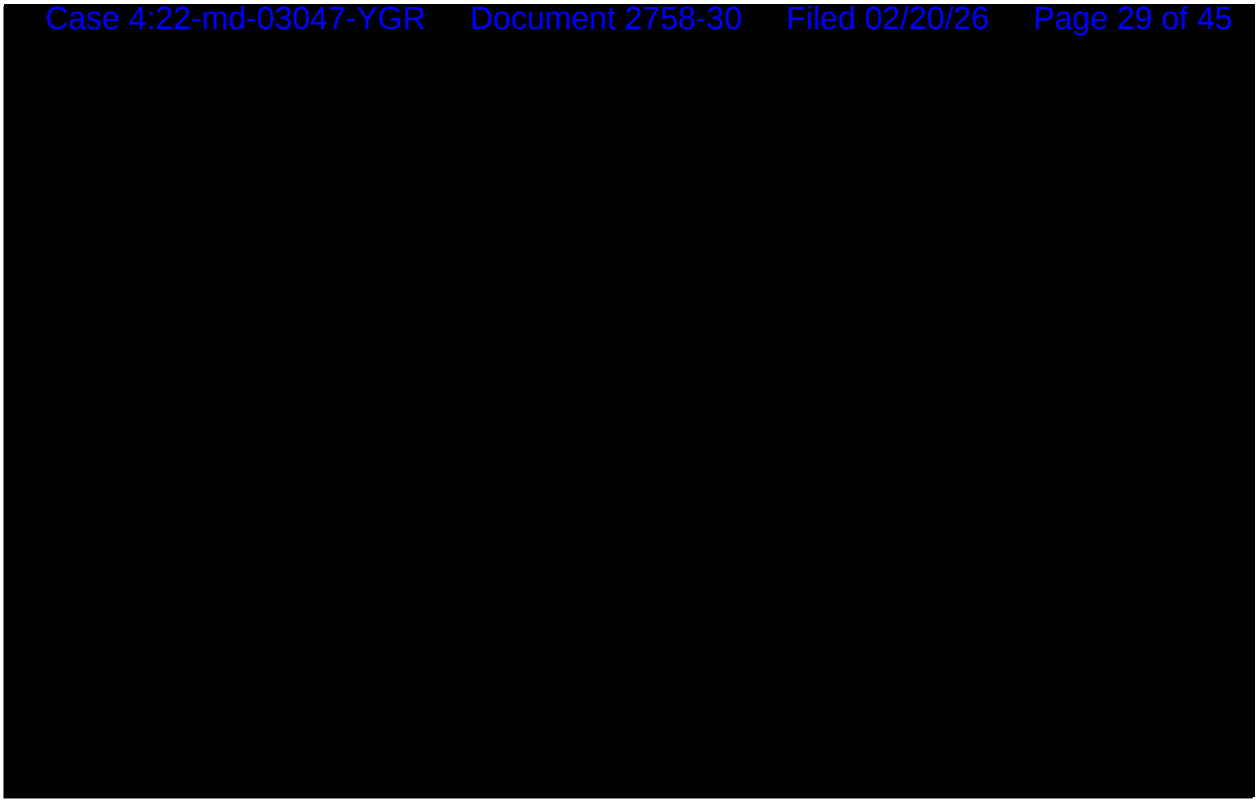
PRIV

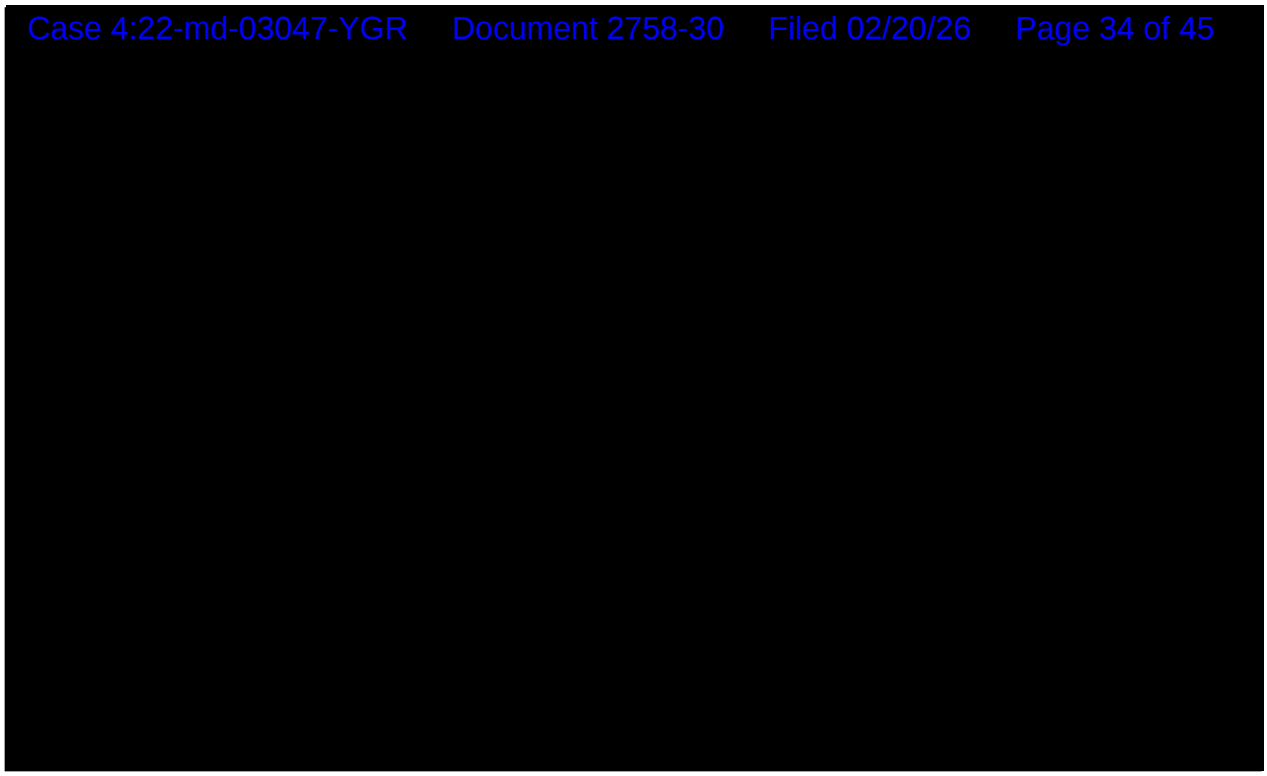
What happened to including tag, mention, and DM reachability as a part of defaulting teens to private?

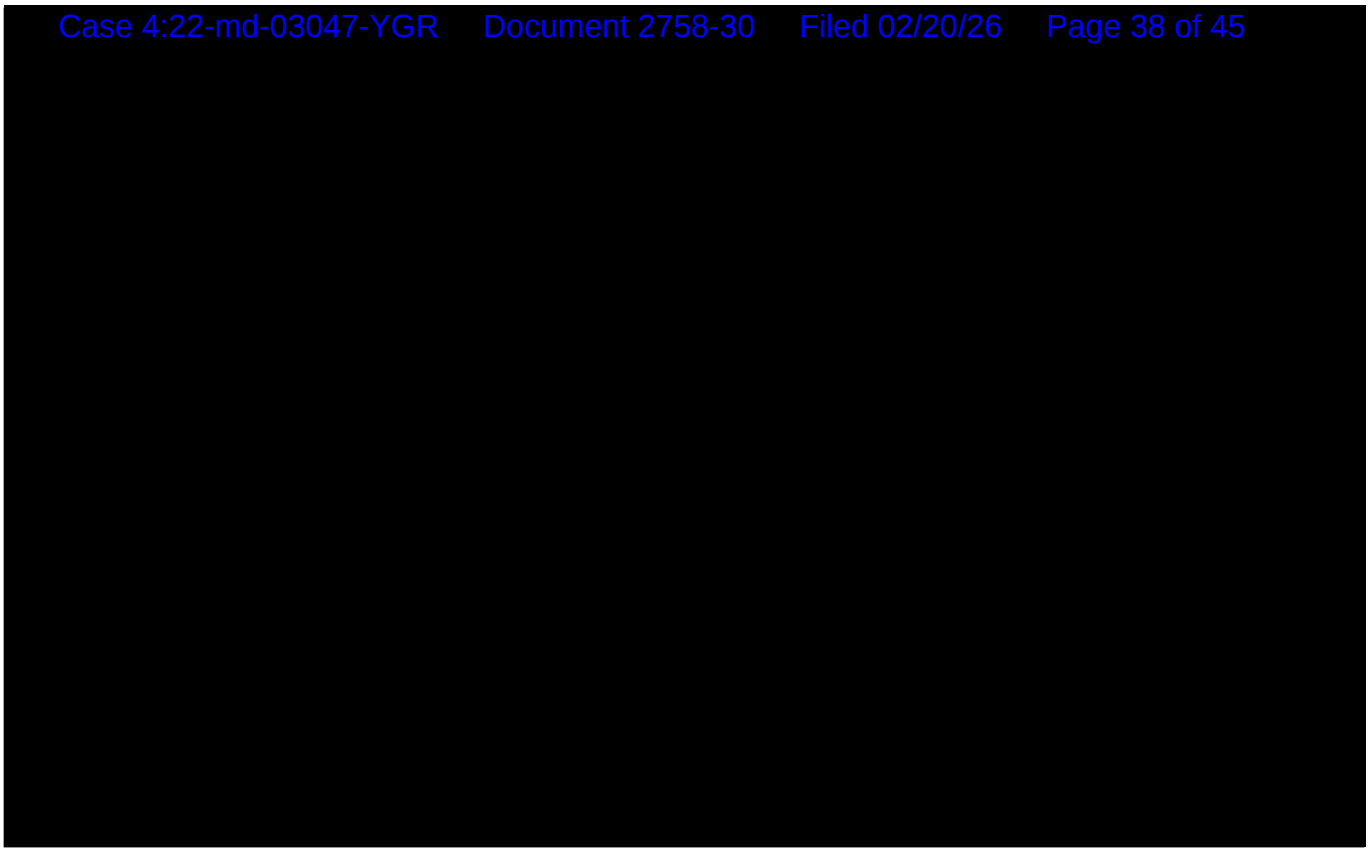
- Well-being made the decision to treat **visibility**, **discoverability**, and **interactions** are separate constructs for teen safety.
  - **Visibility** relates to private accounts
  - **Discoverability** relates to the account being discoverable by others
  - **Interactions** relate to how an unconnected account can tag, mention, or DM you.
- Ultimately, tags and mentions opt-in settings were shipped in H1 as opt-in to prevent bullying and DM reachability is reaching code complete for testing from the Direct team.
- **DM reachability was ultimately decided to be opt-in for teens because data shows (amongst other reasons) that approximately 50% of 1:1 DM requests sent to new users in their first fourteen days on Instagram lead to the sender following the recipient at the end of the first 4 weeks.** This means DMs from unconnected accounts are an important way that new users make connections.

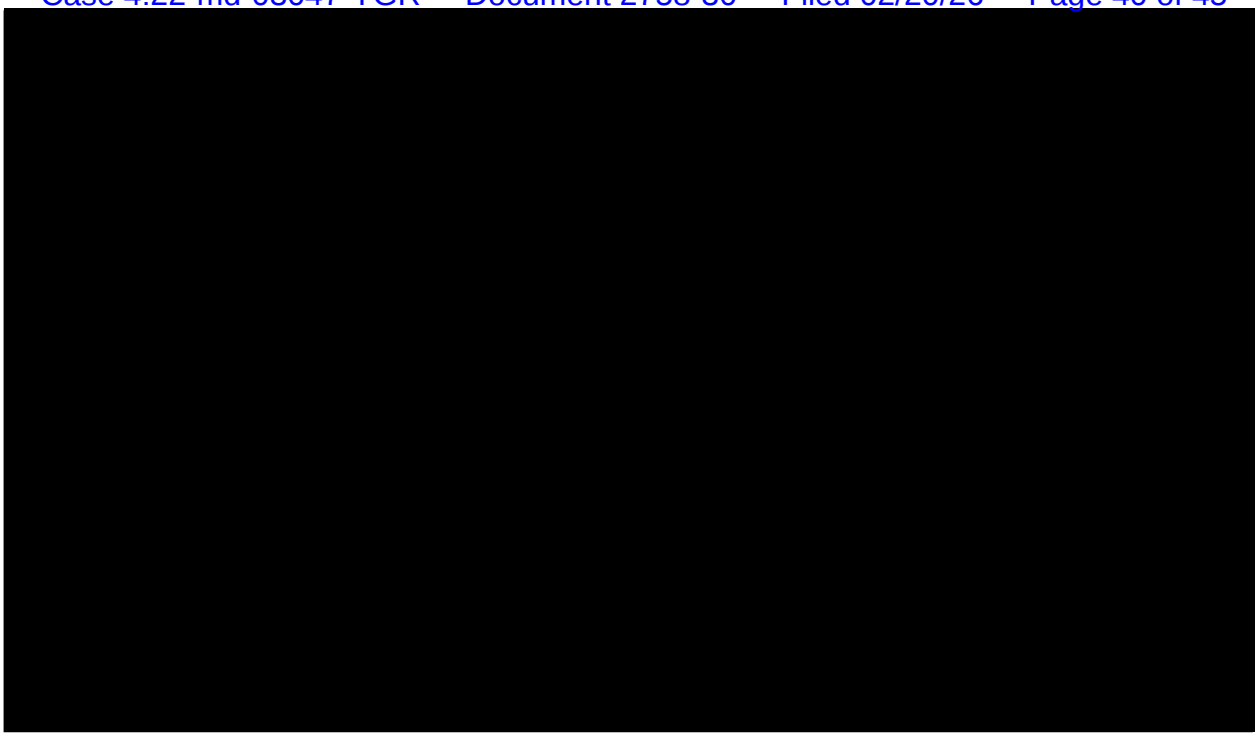
Note on DM reachability insights.

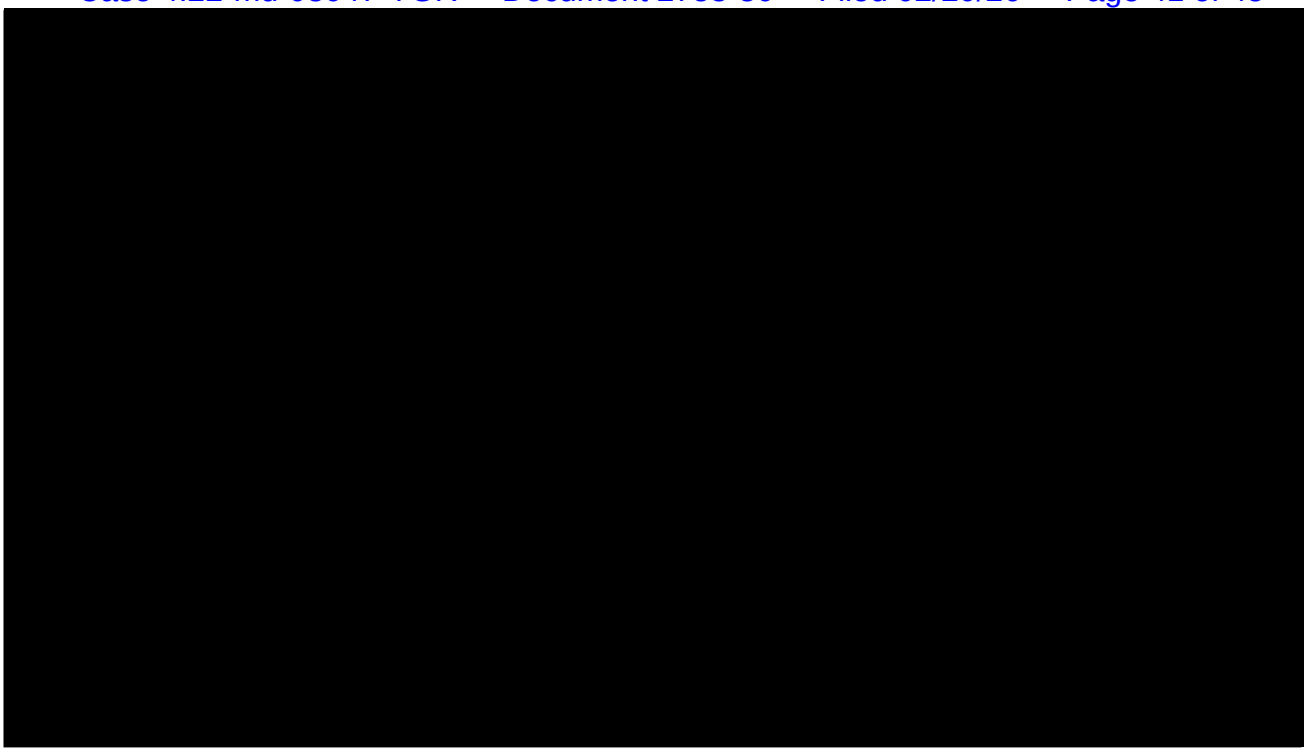












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