

## Digital Comparison Tools Market Study:

### Update Paper - Response form

1. Thank you for taking the time to respond to the questions in the Update Paper for our Market Study of Digital Comparison Tools (DCTs), published on our [website](#) on 28 March 2017.
2. Please download and save this form before completing it. Please submit your response by **5pm on Monday, 24 April 2017**, either by:
  - Email to: [comparisontools@cma.gsi.gov.uk](mailto:comparisontools@cma.gsi.gov.uk).
  - Or by post to: Digital Comparison Tools Market Study  
Competition and Markets Authority  
7<sup>th</sup> floor  
Victoria House  
37 Southampton Row  
London WC1B 4AD
3. Please note:
  - You can choose which questions to respond to, but we ask all respondents to provide a small amount of background information at the start of this form. The boxes will 'expand' to accommodate long responses if required.
  - We are particularly keen to receive evidence in support of responses. If you are able to supply evidence please attach this with your response.
  - We intend to publish responses to our Update Paper in full. If you wish to submit information that you consider to be confidential, this should be indicated to us clearly and an explanation given as to why you consider it to be confidential.
  - The CMA may use the information you provide for the purposes of facilitating the exercise of any of its statutory functions. This may include the publication or disclosure of the information. Prior to publication or disclosure, in accordance with its statutory duties under Part 9 of the Enterprise Act 2002, the CMA will have regard to (among other considerations) the need to exclude, so far as is practicable, any information relating to the private affairs of an individual or any commercial information relating to a business which, if disclosed, would or might, in our opinion, significantly harm the individual's

interests or, as the case may be, the legitimate business interests of that business (confidential information). Further information about how the CMA will use information submitted during the Market Study can be found on our [website](#).

4. If you have any questions about our Market Study or this online form please contact the team at [comparisontools@cma.gsi.gov.uk](mailto:comparisontools@cma.gsi.gov.uk).

## Your details

(Fields marked \* are required)

Title*	Miss
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Forename	Angela
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Surname*	Keen
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Email*	
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What is your role / profession*	Compliance & Risk Officer
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Are you representing yourself or an organisation?*	An organisation (please delete as appropriate)
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If you are representing yourself rather than an organisation would you be content for us to include your name when we publish your response?*	No (please delete as appropriate)
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### If you are representing an organisation:

(a) What is the organisation's name?*	money.co.uk
(b) Please could you briefly explain the role of your organisation, including the sectors in which it operates or has most interest?*	
money.co.uk is an award winning, independent comparison site created by a team of money experts to make financial decisions as simple as possible using clever technology. We donate 10% of our profits to charity, have been accredited as an Outstanding place to work by Best Companies and officially ranked the 7th best small business to work for in the UK.	

## Consumers

**1. Should we focus our attention on the consumer groups we identify in Chapter 5 (see paragraphs 5.82 to 5.95) and if not, what groups should we focus on?**

**2. In which sectors do DCTs not currently play a major role but could in principle offer substantial benefits to consumers? Why have they not become established in these sectors?**

**3. How has the growing use of DCTs affected suppliers' offers to consumers who do not use DCTs in our case study sectors and more broadly? What impact have DCTs had on suppliers' ability to discriminate between active and inactive consumers? What are the implications for vulnerable consumers?**

**4. What factors, if any, have we missed that may be holding back consumers from using DCTs?**

**5. What, if anything, should be done about consumers' concerns about data sharing and the extent to which they feel in control?**

**6. What actions, if any, are needed to improve the way consumers use DCTs – including multi-homing and using DCTs' functionalities such as filtering and ranking?**

## Inputs to DCTs

<b>7. Have we captured the range of issues that might prevent DCTs from operating effectively?</b>
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We believe that you have captured the range of issues that might prevent DCTs from operating effectively on the whole.
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However we feel that another issue that has not been addressed is the need to work with search engines to address the over reliance of organic search rankings on brand profile and engagement and to introduce safeguards based on extent of market coverage, supplier validation, accuracy of results etc. This could make it possible for smaller DCTs to gain greater market share based on the quality of their offering to consumers rather than advertising budgets.
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<b>8. Do the issues identified materially affect DCTs' ability to operate effectively and deliver good consumer outcomes?</b>
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<b>9. Are current or planned initiatives sufficient to address the issues found?</b>
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The planned initiatives are sufficient to address the issues found in specific sectors. However, we feel not all issues have been addressed as per our response to question 7.
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## Competition

### *DCTs' market position and barriers to entry and expansion*

**10. What explains the strong position of a specific DCT in each of our case study sectors? What do DCTs do to grow their business in sectors where they appear to be relatively small compared to the leading DCT of the sector?**

**11. What are the barriers, if any, for DCTs to enter or expand into sectors where they currently do not provide comparison services or where they are currently relatively small?**

### *Agreements between DCTs and suppliers*

**12. What has been the impact of the removal of wide MFNs in the private motor insurance sector?**

**13. What has been the impact of narrow MFNs in the sectors where we have observed them (home insurance, private motor insurance, credit cards, broadband and flights)?**

**14. What is the commercial rationale for the non-brand bidding and negative matching agreements we have observed (in all of our case study sectors) and what is their commercial and competitive impact?**

**15. What is the commercial rationale for the non-resolicitation agreements we have observed (in home insurance and energy) and what is their commercial and competitive impact?**

**16. In which other sectors, if any, are (i) wide or narrow MFNs; (ii) non-brand bidding or negative matching; or (iii) non-resolicitation agreements in place? What impacts do they have in these sectors?**



**17. Are there any other agreements in place that may affect the effectiveness of DCTs and/or the effectiveness of competition between DCTs (and competition between DCTs and other sales channels)?**

*Unbundling and hollowing out*

**18. How has the growth of DCTs affected product features and/or the product mix in our case study sectors over time? What specific evidence/examples indicate these changes?**

**19. How widespread is the use of product reviews and ratings on DCTs and what has been the impact, if any, of the use of these tools?**

**20. What needs to be in place to prevent or mitigate any harmful impact of product unbundling or hollowing out and what can DCTs do about it?**

## Regulation

**21. What are your views on the issues we list in Table 8.1 and at paragraphs 8.13 to 8.42 of Chapter 8 and how could they be addressed?**

**22. What is the balance between potential benefits and risks in introducing a cross-sector approach? What would be the most effective approach(es), and why?**

We feel a cross-sector approach would provide much needed clarity and consistency for DCTs providing it was sufficiently broad to be applicable to all relevant industries.

The components and framework proposed in Figure 8.1 and Table 8.4 would provide a good basis for the development of any such cross-sector principles; although we would recommend a number of adjustments should a related consultation be launched.

For these to be effective clear guidance on how each component is intended to be interpreted would be incredibly valuable, as would a means of DCTs being able to check their understanding and implementation of the rules.

We feel there would be clear benefit in conducting regular reviews and/or consultations into the effectiveness and appropriateness of any such rules to ensure they continued to be relevant and applicable to future developments within the sector.

**23. How could a cross-sector approach interact with existing regulatory frameworks?**

As a business operating within the financial sector we are concerned about the interplay of sector specific relations with the cross sector rules; particularly those which are over-prescriptive.

Should cross-sector rules be implemented we believe it should coincide with a review of sector specific rules to ensure they're still appropriate, valid and

sufficiently flexible to allow firms to provide the best, most helpful and responsible service to their users.

A requirement for sector regulators to regularly review detailed rules would also be beneficial.

## The future of DCTs

**24. What future developments outlined in Chapter 9 are likely to have the greatest impact in driving engagement? If there are any important developments we have missed, what are they and why are they important?**

**25. What future DCT-related technologies might affect or assist vulnerable consumers?**

## Other comments and further contact

We welcome submissions on any of the issues we address in our update paper from interested parties. We would particularly like to hear views, supported wherever possible by evidence, on the following themes if not already addressed above:

- a) What DCTs do and the benefits they can offer.
- b) Consumers' views on and use of DCTs.
- c) Inputs to DCTs.
- d) Competition between DCTs and between DCTs and the suppliers whose services they compare.
- e) Regulation of DCTs.
- f) The future of DCTs.
- g) The focus of the second part of the market study.

<b>Do you have any other comments you would like to add?</b>

<b>Would you be willing for us to contact you to discuss your response?*</b>	Yes / No (please delete as appropriate)
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Thank you for taking the time to complete this form.

Please email it to: [comparisontools@cma.gsi.gov.uk](mailto:comparisontools@cma.gsi.gov.uk).

Or post it to:

Digital Comparison Tools Market Study  
Competition and Markets Authority  
7th floor  
Victoria House  
37 Southampton Row  
London  
WC1B 4AD