Ecosia – Response to Interim Report consultation

The analysis is very thorough, comprehensive, well-structured and in our opinion lists the right measures. In the following, I will comment on some points and answer the questions:

(15) Another concern is that Google Android should not be allowed to give preferential treatment to other Google services, but treat all customers equally. Having all search engines but Google Search pay for becoming a default clearly cannot be regarded as fair and equal treatment.

(24)

- Auction scheme: Prof. Wambach, head of the Commission "Wettbewerb 4.0" (Competition 4.0) of the German Federal Ministry of Economic Affairs, clearly stated that auctions take away all of the economic surplus. Actually, they are likely to take away even more, see "winner's curse". It is not a way to increase competition, but to prevent it.

- Limiting choice to 3+1: an artificially low number of choices is designed to guarantee the above ability to extract all economic value from the auction participants. If there are only a few places and lots of competitors, prices will be very high. On the other side, once there are more places than competitors, the auction price will be zero.

Furthermore, the limitation reduces users' choice for no valid reason:

- Descriptive text: yes, absolutely. Otherwise, it would be too inconvenient for users to learn about these options and they would go for what they already know. Actually, having one sentence with each option visible at all times might even lead to a better user experience.

- Frequency: First, a choice screen should definitely be presented at the first time a user starts his/her phone and browser. Second, in case a user chooses a search engine other than Google Search in Google Chrome, Chrome should not be allowed to show warning messages like it currently does and invite users to switch back.

(31) Widening the scope of the search screen: We believe that a mandatory choice screen for all devices and for all browsers with a certain market share would be a great way to increase competition and awareness that competitors even exist.

(52)

J2: Yes, certainly. The current "choice screen" is not a choice screen, but an auction screen. It does neither provide fair and equal access to default settings, nor does it offer users a large number of choices with the highest user attractiveness (instead it offers a small number of services with the highest willingness to pay).

J3:

a) The current design of Google's "choice screen" shows that these screens definitely need to be regulated beforehand. Even subtle differences can have huge [effects](#).

b) Instead of providing fair and equal access to default settings, it gives preferential treatment to Google Search and makes all others pay. Instead of increasing competition, it is designed to take all economic benefits away (see "winner's curse"). Instead of giving users a large number of quality choices, it gives a short list of paid options. Google also violated their own promise to not allow Google partners by adding gmx.

c) The size of the screen is probably a good determinator for the number of options and should allow at least 10 on any device. It could also allow for scrolling or page flipping.

The slots on the choice screen should be given to those search engines with the highest user attractiveness. CTR or Market share could be taken as an indicator. Or, a regulator could pick the most attractive choices, based on market share, market share growth and followership in social media.

The ranking of the choices on the first screen should be done in random order.

Auctioning clearly is not a way to either increase competition, nor to provide a good user experience.

J4:

a) Having Android and iOs applying real choice screens would indeed solve the issue for mobile devices. For the more lucrative desktop market, it would need to be extended at least to Google Chrome.

(53)

J5: Yes, but of course anonymized, e.g.: query, URL clicked by user, click back and rough location e.g. on a post code level

J6: If the data was accessible at an API, everyone could decide for themselves how often they would request it depending on their individual requirements

J7: It would certainly help, but it would be very expensive to design and operate a very distinct product for the UK only.

J9: Yes, definitely. It should be free of all personal data, like IP, customer ID, email address, etc.

(54)

J15: There should be little criteria for the recipients of pure algorithmic results as long as the results are not being attributed to the supplier. Paid results might require more constraints, though also here, the market would likely punish wrong-doers quickly. "

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COO
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