

Dear Sirs

○○○○RE: **CMA's online platforms and digital advertising market study**

We are a business that provides information, call connection and signposting services (ICSS), totally dependent on digital search engine service providers like Google for access to the online market.

We are regulated by the Phone-paid Services Authority (PSA), the regulator for content, goods and services charged to a consumer's phone bill. This regulatory regime is comprehensive and effective with provisions in the PSA Code designed to protect consumers by ensuring they are given sufficient information about the identity, nature and cost of the ICSS to make informed decisions.

We welcome this study as it has the potential to shape the market to encourage competition on a level playing field and to deliver significant innovations and benefits for consumers.

Digital advertising is not relevant to corporate online platforms but businesses of all sizes who rely on search engines like Google to make their services visible to consumers online.

We have experienced major issues with Google in relation to its increasing market power and dominance as well as concerns at the lack of competition along with potential remedies.

In a nutshell, we have found Google's lack of transparency, lack of regulatory oversight and its sheer dominance has irreparably damaged our business, harming consumers and reducing choice.

We provide consumers with needed information in an easily accessible form and competitive price when compared to traditional directory information services allowing consumers to find numbers quickly compared to searching on the web.

We are totally dependent on online advertising and search engine providers especially Google leaving us no choice but to contract with their Ads service. Google's market power and dominance over digital advertising is significant giving it the ability to impact our business and many others like us.

As our business is almost entirely at the mercy of Google's decisions which given their unilateral changes, interpretations of policies and decisions results in an unfair situation. Throughout we have been subjected to Google's arbitrary and unexplained suspensions of our Ads campaigns, ads and finally account. Google's teams are difficult to contact, usually cite unspecified alleged breaches of the Google terms or policies, never particularising them. This has rendered our business unable to operate. This means we are not able to remedy the alleged breaches and are stuck in limbo.

We also find Google is attempting unauthorised regulation of our services, not even

in a fair, proper or balanced way that official regulators would conduct themselves. Google should not be allowed to do this.

The French Autorite de la concurrence has identified and itemised issues we too have faced and whilst it may have different powers than the CMA, it has identified Google's dominating, discriminatory and unfair practices that are likely to be uniform across various territories.

The CMA's remedies need to go much further but are a good start. There should be clear policies and rules for companies like Google and their unilaterally imposed terms should not be allowed to stand as they are grossly unfair and discriminatory by offloading all possible liabilities. We also agree with the recommendation that suppliers of browsers should provide consumers with options for search engines. If different search engine options were available to consumers, they might use alternatives.

We await your findings in due course.