

Dear Sirs,

We write in response to your consultation re: Online platforms and digital advertising.

We are an online site facilitating consumers in raising and resolving complaints relating to disputes over products and services, providing publicity and prominence should organisations choose not to engage.

Our service seeks to engage with consumers via Google's Ads service, given Google's dominance in the search market, through which consumers can access our service. Our account has been suspended by Google who to date has failed to clarify the reasons or particularise the causes, repeatedly citing a generic policy we believe we have never breached. We have appealed on a number of occasions, setting out the reasons why we believed we had operated in accordance with Google's terms & conditions and policies. Google issues the same automated canned responses, leaving us frustrated and in abeyance.

Given the lack of any serious competition or alternative to Google, we have been unable to advertise on alternative platforms and have been forced to cease delivery of our services. We cannot escalate the matter as Google provide for no ADR mechanisms and we have been advised court proceedings will prove far too costly.

1. We agree with your summary of the markets within your scope and market investigation.
2. Our concerns regarding your initial findings comprise:
 - Google policies are confusing in their formulation and interpretation
 - Google policies are subject to arbitrary modifications and updates
 - Google interprets its policies to its advantage, never impartially or fairly
 - Google's policy application is not objective, coherent or consistent
 - Google's support teams often fail to understand Google policies themselves, providing conflicting advice depending on who you talk to.
 - Google's conduct prevents us from planning, decision making or running our business given the unstable environment it has created
 - Google applies its policies in a discriminatory fashion, allowing competitors advertising similar services to ours whilst suspending our account
3. As regards your proposed interventions, we are of the view they are wholly inadequate, too little, too late, far too limited in ambition and scope and will have no real effect on the UK online advertising marketplace. The CMA has to address Google's market dominance and the serious lack of alternatives to it, all of which is stifling small businesses, creating a greater divide between small businesses and corporates in this area and limiting innovation. Greater regulation and alternative dispute resolution mechanisms along with serious penalties and consequences for egregious corporate behaviour.

We look forward to your findings with interest.