



Airlines for America®

We Connect the World

February 3, 2025

Competition and Markets Authority
The Cabot
25 Cabot Square
London
E14 4QZ
United Kingdom
Email: searchsms@cma.gov.uk

RE: SMS investigation into Google's general search and search advertising services

Dear Sir or Madam,

Airlines for America (A4A), on behalf of its members,^[1] appreciates the opportunity to comment on the Competition and Markets Authority's (CMA) consultation on whether to designate Google as having strategic market status (SMS) in respect to its provision of general search and search advertising services. Several A4A members operate extensive services to the UK and have a strong vested interest in the outcome of this consultation.

We do not comment here on the CMA's SMS investigation. Instead, we wish to focus on two principal concerns relating to Google search displays:

- Any potential government changes to Google Search should not promote Vertical Search Service (VSS) websites over airline websites. Making it more challenging for customers to directly access airline websites deprives them of the most accurate information in relation to available flight options.
- Any potential government changes should continue to permit Google to display fares from airline websites. In the EU, regarding implementation of the EU Digital Market Act Article 6(5) in relation to Google search services, VSSs have argued that they alone should enjoy this privilege, not meta search engines. Depriving consumers of information on airline websites would again deprive them of key information relevant to their decision making.

These are our preliminary comments only. We would appreciate the opportunity to further engage with the CMA regarding our concerns about the effects on consumers and the travel

^[1] A4A is the principal trade and service organization of the U.S. scheduled airline industry. Members of the association are Alaska Airlines, Inc.; American Airlines Group, Inc.; Atlas Air, Inc.; Delta Air Lines, Inc.; Federal Express Corporation; Hawaiian Airlines; JetBlue Airways Corp.; Southwest Airlines Co.; United Holdings, Inc.; and United Parcel Service Co. Air Canada is an associate member.

industry of potential interventions relating to Google search services. In the meantime, please do not hesitate to contact me if you have any questions or require further information.

Sincerely,

Keith Glatz
Senior Vice President, International Affairs