

CMA Invitation to Comment in relation to the CMA's Strategic Market Status investigation into Google's General Search and Search Advertising services

Submission - Anonymous 2

Box 3: Questions on scope of the investigation and SMS assessment

Q1: Do you have views on the proposed scope of our investigation and candidate descriptions of Google's general search services?

Yes, I believe the scope makes sense as an overview of where Google has the strongest monopoly in the market

Q2: Do you have submissions or evidence relevant to the avenues of investigation set out in paragraphs 26-28? Are there other issues we should take into account, and if so why?

I have anecdotal evidence as a paid search expert of over 15 years in a range of industries as well as a consumer of Google products and services.

Q3: Do you have views on how Google's general search services might be affected by the development of AI interfaces providing alternative means of returning information?

Yes

Box 4: Questions on potential issues and interventions

Q4: Do you have views on whether the issues outlined in this section are the right ones for the CMA to focus on, or whether there are others we should consider?

Broadly I agree that the issues are the right ones to focus on as they cover the areas where Google has the biggest competitive advantage. However I am highly doubtful that the proposed interventions will have any effect on lessening Google's competitive advantage in the market to the extent that any competitors will be able to increase their share. As such I would question the value of imposing the interventions, especially if there is not likely to be any consumer or advertiser benefit either.

Q5: Do you have views on whether the potential interventions are likely to be effective, proportionate and have benefits for users, including consumers and business search users? Are there other measures the CMA should consider that would be more effective or proportionate, or that would deliver greater benefits for users?

I think most of the proposed interventions will be ineffective at achieving the aim of lessening Google's competitive advantage. There aren't enough competitors that would come close – [REDACTED]

The proposition to prevent Google from sharing data across services, for example, will make Google services slightly less effective and reduce the choice of consumers who might prefer this level of personalisation, but not lessen its competitive advantage to the benefit of any other search providers. I don't think this is worth pursuing.

In regard to fair terms for publisher content - I do think some restrictions on AI overviews would make sense, as publishers are having their content used without their permission to train Google's AI and serve answers to users while receiving no benefit in the form of clicks to their websites, which has always been the currency/reward of creating the content in the first place. AI overviews are improving fast despite early issues but when they appear they dominate the SERP resulting in significant loss of clicks to the websites whose content has been used to produce the overviews. Consumers who want to access the AI overviews should still be able to, but perhaps by navigating to a separate tab or having to expand a drop down for example. I don't know how practicable it is to force Google to pay publishers for using their content for AI and I also sincerely doubt that any other AI models such as ChatGPT have paid for the content they have used to train their models so it could be more cost effective for Google to integrate a 3rd party AI model which still uses publishers' content without payment. In most cases publishers are able to monetise their traffic so clicks would be more effective a way for Google to compensate publishers.

The proposition on search advertising is incredibly vague so it is hard to tell whether it is likely to be effective. Practically speaking a fully transparent auction seems impossible to achieve given it is all driven by black box technology now. However Google has removed or reduced some reporting that advertisers have previously relied on and advertisers lack the power to do anything about it. For example, search query reporting has been greatly reduced, as well as auction insight reporting. That type of reporting enables advertisers to make data driven decisions and was previously available. Google has also made it harder for advertisers to control campaigns using negative keywords, by forcing advertisers to submit requests to their Google account team rather than providing an interface for advertisers to add them themselves. Forcing Google to reinstate reporting and negative keyword control that they have removed for some or all campaign types would be more practical and helpful for advertisers than trying to influence the auction or make it more transparent in some unspecified way.

I don't have particular concerns about the other proposed interventions at this time although they are in some cases vague and the devil is in the detail when it comes to having the required effect.

Q6: What are the key lessons the CMA should draw from measures imposed in relation to general search services in other jurisdictions? Are there specific areas where imposing a similar measure in the UK is more or less important for their overall effectiveness?

*The EU CSS ruling in 2017 against Google Shopping was a mess that [REDACTED]
[REDACTED]
[REDACTED].*

*There were no benefits to consumers or advertisers from this and [REDACTED]
[REDACTED]*

*[REDACTED] Additionally the [REDACTED]
[REDACTED] Any intervention considered
must avoid outcomes where Google is unaffected and advertisers or consumers bear
the brunt of the intervention, while not actually lessening Google's competitive
advantage.*