

Submission from Association of Online Publishers (AOP)

Comments submitted by Richard Reeves, Managing Director, AOP:

Please consider these points, in relation to 'Self preferencing', as a response to the 'invitation to comment':

- **Google's 'Site Reputation Abuse Policy':** I have previously shared concerns on this, and am aware you have spoken to other publishers about this and its impact on publishers' ability to develop eCommerce related strategies. Simply, the headlines are that the manual enforcement process is inconsistent, with examples of publishers with the exact same approach and processes being treated differently and thus creating inconsistency with the policies application and enforcement. If you want to appeal against a policy enforcement notification you are met with an automated 'Reconsideration Request' button. The policy favours Google's own eCommerce strategy and significantly reduces visibility for other legitimate offerings.
- **Proprietary Video discovery on SERPS:** Publishers continue to invest significant money and resource in the development of video, as previously raised, we still have a position where by over 85% of results surfaced within SERPS favours YouTube. Whilst publishers can ensure visibility for their videos if hosted on the YT platform, their ability to monetise that content is massively restricted without the ability to drive traffic to their owned and operated.
- **Following Googles decision to replace cookie deprecation for a user choice mechanism:** the absence of any subsequent clarity on the UCM continues to disadvantage publishers by inhibiting their ability to make future strategic advertising and consent related implementation decisions with any certainty, placing further strain on resource and creating advertising revenue generation uncertainty.

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