

ITC Request for SMS investigation into Google's provision of general Search Services

Submission from Jean-Paul Schmetz, Chief of Ads, Brave Software Inc.

I speak as the:

* founder of the search engine (Cliqz Search founded in 2008) which was acquired by Brave Software in 2021 to become Brave Search.

* I currently also run all advertising products for Brave Software Inc. (Brave Search Ads being the most relevant to this investigation). Brave Search is one of only 3 fully independent search index in the western world (Google and Bing being the other two). As such we have a special understanding of what it takes to compete against Google.

* The Chairman of Coc Coc Pte Ltd. a competitor in search services and search advertising in SE Asia (not active in the UK except probably as the browser/search engine for some Vietnamese immigrants)

I am basically the only person I know to have led the building of two independent search engines in the last 15 years competing directly and successfully against Google worldwide (for Brave) and in Vietnam (for Coc Coc) in both search and search advertising.

It is natural to consider Google's stronghold on the search business almost chronologically:


- (1) first you need to build a search engine,
- (2) then you need to make sure you acquire users and
- (3) the you hope you will be able to monetize it.

Some believe that remedies against Google's monopolistic behaviour should follow the same pattern - I do not believe so. All of Google's stronghold is about monetization not about search quality or distribution (or only indirectly).

Brave Search and Coc Coc Search are the living proof that it is possible to build a competitive search engine from scratch and operate them fully independently. Along the way we (and our investors) were never in doubt that we could achieve building such a search engine. However, finding investors was extremely hard since no one wanted to compete against Google [REDACTED]

[REDACTED]

[REDACTED]



So companies like Brave (where I run Ads Products and Sales) or Coc Coc in Vietnam (Where I am the Chairman) do not receive money from Google for traffic we send to them (in some countries we still set Google as the default and some of our users prefer to switch to Google) [REDACTED]. While Coc Coc is allowed to use Google AdSense for Search, it is only allowed for a very small subset of queries (nothing coming from our browser itself)

If the above would be solved (i.e. Google would have to provide monetization for search traffic and adsense for search on a non-discriminatory basis), there would be massive changes to the ecosystem.

1. Defaults would be gone (this is part of being non-discriminatory) and the choice would go to the user. This would not massively change market shares dramatically but would help (The DMA choice screens in the EU have some influence but Google's massive marketing campaign "Choose Chrome" dwarfs anything competitors could invest in such a campaign)
2. Companies like Brave and Coc Coc would immediately become profitable enough to start user acquisition while companies that use search APIs (Duck Duck Go, Ecosia, ...) would become even more profitable since Google AdSense for Search is more lucrative than other alternatives (bing search ads) and would also bring people away from Google.
3. Major platform (Apple, Firefox, Samsung) would not be punished for doing special deals with alternative search engines (or even be tempted to acquire or create a search engine they can brand)

I am available for further questions.

best wishes,
Jean-Paul Schmetz
Founder/CEO Cliqz GmbH
Chief of Ads Brave Software Inc.
Chairman Coc Coc Pte. Ltd.

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