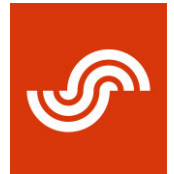


Martin Corcoran  
Summit Media and Productcaster  
28/02/2025  
Response to CMA invitation to comment



Dear Sirs, I have been participating in the EU Digital Market Act (DMA) since 2022, attending several workshops in Brussels and sharing my opinion as an independent business owner in the retail performance marketing space. I have no other interest than my own but I feel obliged to share a practical point of view thinking of all stakeholders in regards to competition and 'gatekeepers' – that is Googles, agencies, tech providers, brands and retailers and customers. It's a large and diverse digital eco-system and often key stakeholders – especially customers get forgotten.

I have copied my original commentary submitted to the EU DMA group on December 1<sup>st</sup> 2023 and I would point to the fact much of what I said remains highly valid. The only other point I would since 2023 is the emergence of AI and Chatbots which are further challenging the position of gatekeepers and making the market organically more competitive. With Chat GPT and DeepSeek et al Google search has new competitors and this is already impacting share. In regards to search I think this I a key point and the regulations (if any are decided upon in search) could look very outdated very quickly if the new breed of competitors continue to take share.

I would be very open to participating in any future workshops or to be interviewed by the UK CMA and feel well placed to give a balanced view representing a variety of stakeholders and businesses.

I look forward to any correspondence,

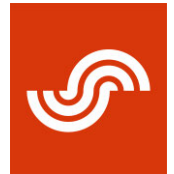
Thanks

Martin

**From:** Martin Corcoran <[REDACTED]>  
**Sent:** Friday, December 1, 2023 5:31 PM  
**To:** EC DMA ARTICLE6-5 <[REDACTED]>  
**Cc:** Ryan Thomas <[REDACTED]>  
**Subject:** Productcaster Regulation Feedback

Dear Sirs – as owner and CEO of Summit and Productcaster CSS I am writing to you to share my point of view as a business owner and on behalf of the thousands of retail brands and agencies I work on behalf. So you understand the scale of Productcaster we work with 1,000+ brands with 33 of those retail brands on the Retail X 500 list (big ones).

I am extremely disappointed by the blinkered and ill-conceived requests of the 43 CSS who are pushing for the removal of the PLA advertising channel. I absolutely refuse any claims this is a move that will be good for customers or the retail industry. This is nothing more than a landgrab and negotiating standpoint as they seek to reap the reward of financial penalties on Google. If they actually pull this off it would be a disaster for the European economy with huge negative impacts on jobs in retail and marketing.



From a customer perspective – the marketing industry is trying to deliver frictionless, easy experiences for customers, helping them to get buy the right product the right price with minimal fuss. Sending customers off to random untrusted CSS websites where they can compare prices and review a small sub set of products from a small sub set of retailers is not customer centric and will no doubt detrimentally impact the value of retail. No doubt customers would also feel the pinch of a poor experience with CSS increasing advertising prices and the cost of goods sold - passing those costs increases onto customers.

From a brand / retailer perspective – the margins are already so small in retail (c5% net margin after costs). In no way is this improved by sending a brands customers to a 3<sup>rd</sup> party website. The 3<sup>rd</sup> party website – Kelkoo, Klarna etc would then ‘own the customer’ from a marketing and contact perspective while also taking a significant cut of the already meagre retail margin though commission performance models. Retailers will end up with fewer known customers, and less margin. A move of this kind would no doubt significantly accelerate the number of retails going bust / administration further damaging competition and pricing while playing purely into the hands of the larger CSS and market place platforms. Brands would then be held to ransom having to pay even larger costs to compete and or co-operate with the CSS cartel.

Lastly from an agency perspective – a move to grant the entire Shopping channel to independent CSS would essentially create 43 ‘mini Googles’ who would then own and dominate the performance marketing landscape. That would in effect kill thousands of agencies specialising in helping brands win via Google and would be a blow that I’m not sure performance marketing agencies (of which there are many!) would recover from.

In summary removing the PLAs and granting the channel to CSS only is in no way good for customers, it will kill off many retailers who will not be able to sustain less sales / worse margins and utterly decimate performance marketing agencies who would be ‘locked out’ from advertising on the channel entirely.

Productcaster is a CSS and a big one. What is described above could ultimately be beneficial for Productcaster – in essence we could probably join the band of 43 CSS but barring purely selfish financial reasons I can not think of one single benefit for anyone who does not own a CSS.

Happy to share my thoughts in detail and let you speak to some of my brands who share my opinion.

Thanks  
Martin