



Invitation to Comment on the Strategic Market Status Investigation into Google's General Search and Search Advertising services – Skyscanner's response

Skyscanner welcomes the opportunity to respond to this Invitation to Comment on the Competition and Markets Authority's (CMA) investigation into Google's general search and search advertising services.

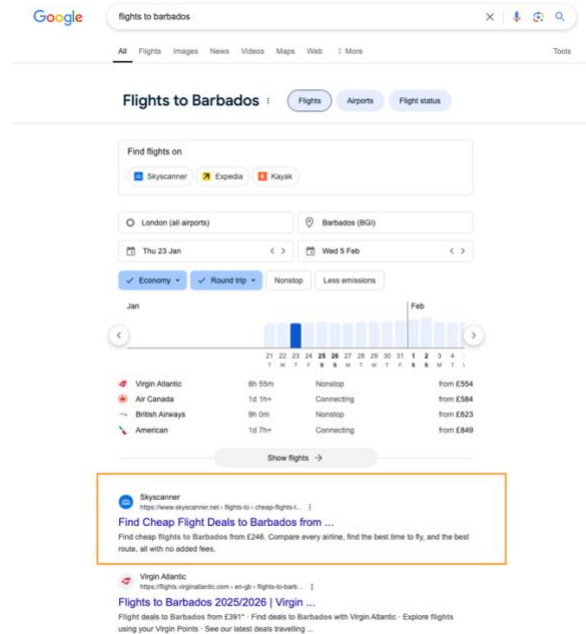
Skyscanner is a specialised search service that helps users find the best flight, hotel and car hire offers on the market. We are a UK-founded and -headquartered business and were one of the first flights metasearch services in the world. Like almost all digital businesses, we derive a lot of our traffic from Google Search, and we make use of many of Google's ad tech products. This is inevitable: many consumers begin a specialised (in our case, travel) search on general search, and Google has a 90%+ share of the general search market in most markets.

Over the years, Google has also launched a series of specialised search services, including Google Shopping, Google Flights, and Google Hotels. Specialised search is very different to general search. Whereas the latter crawls the world wide web to return results in response to (in theory) any query, a specialised search service surfaces a specific type of content provided via an Application Programming Interface (API) by its commercial partners.

We have no problem with Google moving into new verticals to offer new products. Its uniquely influential position as a key consumer access point for its competitors, however, means it is essential that Google acts fairly to competitors as it enters new verticals.

Unfortunately, Google has shown itself unwilling to do so. Instead, it has leveraged its overwhelming dominance in general search to give itself an unfair advantage in specialised search. In flights, it has done this by placing Google Flights in the most prominent position on the search engine results page (SERP), above all organic results. Since around 80% of all clicks go to the top three links on the SERP, the result of this is that Google Flights diverts traffic away from potentially more relevant organic results. Google also enhances the link to Google Flights with a series of user-friendly functionalities and features that are not provided to competitors' links, such as pricing information and date-input boxes.

These enhanced features, embedded directly into the SERP, mean that users can complete a significant amount of their flights search on Google Search (by interacting with their integrated Google Flights product, or widget) without needing to navigate to a specialised search service. By the time consumers do need to navigate to a specialised search service (to continue a booking, or to complete a more detailed search), Google Flights is positioned in the most favourable part of the SERP to benefit most.



An example of the Google Flights widget on the UK SERP, placed ahead of organic results and with much richer features and functionalities when compared to the organic results beneath.

In short, Google has for years unfairly self-preferenced its own travel search services to the detriment of rivals including Skyscanner, with little consideration paid to the relevance and quality of results. In addition to the SERP practices outlined, it has done this by utilising its insurmountable data advantage (including its access to the data generated by its competitors' use of Google Search and Google's search advertising products) to rapidly optimise its own travel search services.

The level playing field has been so tilted in Google's favour, and barriers to entry raised so prohibitively high in the verticals that Google has decided to enter, that only regulatory intervention can restore competition (and therefore growth and innovation).

We therefore strongly welcome the CMA's rapid use of its digital competition tools, which have so much potential to catalyse innovation across the UK's tech sector, and reiterate our support for the CMA's work in this area to date.

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

Skyscanner, as a specialised search service for flights, hotels, and car hire, competes directly with several of Google's own specialised search services (including for flights and hotels). In addition, we compete directly for users with Google Search, because Google's general search service is the single most common entry point for users searching for travel options.

Skyscanner agrees with the CMA's proposed scope of its investigation into Google Search, as well as the candidate descriptions of Google's general search services. We note that in its Investigation Notice, the CMA has preliminarily decided that all results included on the SERP are in scope of this investigation, whilst the dedicated sites for its specialised search services, such as Google Flights, are not. We understand this to mean that the way in which Google Flights (and Google's other travel services) appear on the SERP are in scope of the investigation, which is vital to considering how Google self-preferences its own services in terms of their display on the SERP.



We therefore support the decision to focus on all user-facing aspects of the search engine, including the SERP, search features, and newer introductions such as AI overviews.

Similarly, we support the CMA's proposal that this investigation will also encompass the infrastructure underpinning the general search service, including Google's crawling, indexing, and ranking activities – this is required to be able to consider how Google self-prioritises its own services in terms of ranking. How individual results (as well as different units or groupings of similar results) are ranked on the SERP cannot realistically be separated from the presentation of the SERP.

It should be noted that not all the results on the SERP are populated by Google crawling the web. For example, the integrated results from Google Flights are provided instead via APIs with individual airlines. This widget therefore operates in the same way as a specialised search service. It is important that the CMA is able to consider the underlying infrastructure of all results and units, as an assessment of whether any new units introduced by Google to the UK SERP to comply with any future Conduct Requirements may require an assessment of whether they continue to constitute a form of Google's specialised search services (see Question 6).

For years, Google has increasingly self-prioritised its own specialised travel search services over competitors' instead of competing on the merits. Google has done so in several ways – by including search features on the SERP that have meant that users can complete most of their specialised search on the SERP without having to navigate to a specialised search service that is shown below this widget, and (especially in recent years), by tweaking the criteria through which organic search results are ranked so that Google Flights comes out on top.

Certain design elements of the SERP are actively misleading users (for example, the 'find flights on' button, which displays our logo, sits above the Google Flights widget, where users can input their travel dates and see live prices – the impression created for users is that the widget contains results from all relevant websites, when they are in fact using only Google Flights, whose results are determined by the commercial agreements they have with their partners). Our internal data demonstrates that the more Google has pursued these strategies, the more we have lost out on valuable traffic. We have had to compensate for this in part by generating more paid traffic (see below).

Google's policies for appearing on the SERP represent another powerful lever in the company's self-prioritising ability. Google announced in 2023 that companies should no longer include pricing information in the headings for their search results ('title links'). Google argued that, given how quickly prices can fluctuate in the flights market, there is a heightened risk of users being presented with a different price to the one displayed in the title link when they click through to a landing page. As a result, the main pricing information available on the SERP now is displayed in the Google Flights widget. Consumers value pricing information so much that it can boost click-through rates. We can therefore assume that this has also boosted traffic to Google Flights. It is therefore important that Google's policies for appearing on the SERP (or for using its search advertising tools) are also considered as part of the CMA's investigation.

Furthermore, given its global dominance in general search and search advertising, Google has access to a plethora of granular data about search queries and user behaviour. There is simply no way that any other search service, specialised or not, could under the current conditions ever obtain access to the same quantity and quality of data. Access to and cross-use of such data allows Google to optimise its specialised travel services in a way that is unavailable to competitors. The feedback loop here is the same as the one the CMA has noted for Google's general search service in box two in the invitation to comment (the most relevant factors being the importance of data and network effects). Thus, while we see the main problem in Google's self-prioritising on the SERP, and do not take issue with the existence of Google Flights as a separate service, it is important that the CMA considers (as indeed it has indicated it will) how Google leverages its position in general search to undermine competition in specialised search beyond the SERP.

We support the grouping of general search and search advertising as one digital activity, given the interdependencies between these activities. Not only is the combination of both services integral to Google's provision of a general search service, but the relationship also explains the commercial incentive for Google's anti-competitive self-prioritising.

As competing businesses find it harder to attract organic traffic via Google Search, the only means available to them to regain some traffic is to pay Google for a search advertisement. In this way, consideration of the need to monetise the search service via ads has a direct bearing on some of Google's most unfair practices. And the longer a user searching for a flight remains on Google Search (by interacting with the integrated Google Flights widget), the less competitive constraints specialised search services' ads businesses place on Google.

Finally, we believe that Gemini should be in scope insofar as it interacts with Google's general search service. If users are redirected to or shown results from the SERP in response to a query put to Gemini, this relationship should be in scope of the CMA's investigation. The CMA should also examine as part of this investigation how data that Google collects from Gemini users may be used to optimise its general search service (for example, resulting in changes to the design of the SERP or how results are ranked, which could allow Google to unfairly use the data to optimise its own organic travel search service results on the SERP and outrank competitors). Further views on how AI developments might affect Google Search and this investigation are set out below.

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?

Skyscanner has a range of evidence relevant for the avenues of investigation set out in paragraphs 26-28, especially regarding the extent of competition between Google Search and specialised search services; whether Google can extend its power in general search and search advertising services to other activities; and whether Google can influence how other firms conduct themselves in relation to general search and search advertising.

The extent of competition between Google Search and specialised search services

Google Search is a direct competitor to Skyscanner in flights searches, despite the former being a general search service, because the way in which it integrates Google Flights results into the SERP means that consumers can conduct a large part of their specialised search service directly on the SERP. By engaging with the Google Flights widget (which is just an enhanced link to the dedicated Google Flights webpage), users can:

- Input and change their departure and destination airports;
- Input and change their travel dates;
- View the cheapest date to travel around their chosen dates (via the interactive price graph);
- Identify the airlines flying the user's chosen route;
- See the flight time;
- See an indicative price for each airline (this is the most detailed pricing information on the SERP following Google's updated policy around displaying pricing information in title links);
- Filter results by fare class and emissions.

One of the main reasons why users visit a specialised flights search service is for planning purposes, rather than to make a booking. Many consumers do not have a clear idea of where and when they want to travel when they first visit Skyscanner. Instead, they wish to gain insight into the cheapest time to travel to different destinations, which airlines fly particular routes, how long the flight is, etc.

If a user can do all of this directly on the SERP, then Google Search is operating as a specialised search service and reducing the need for users to navigate to a competing specialised search service. We are, in effect, competing directly with Google Search for traffic.

Google's behaviour also reduces the ability of specialised search services to compete with Google Search for search advertising revenue, because the longer users spend on Google Search, the more appealing Google's search advertisement business will be to airlines.

Whether Google can extend its power in general search and search advertising to other activities

It is Google's overwhelming dominance in general search that has allowed it to extend its power into specialised search. It is its control of the SERP that enables it to integrate Google Flights, to bestow it with much more appealing user features and functionalities, and to place it consistently above organic results. Given how important

the display and ranking of a search result on the Google SERP are to the amount of traffic it receives, Google has been able to rapidly gain market share in specialised search.

In a similar way, its unique access to data, obtained via the operation of the world's dominant general search service and businesses' use of that search service, means it is able to cross-use that data and rapidly improve its specialised search services (including its SEO performance).

Whether Google can influence how other firms conduct themselves in relation to general search and search advertising

Google also has an enormous ability to influence how other firms conduct themselves in relation to general search and search advertising:

- It sets the (often opaque) parameters for determining organic SEO performance.
- It has the ability to unfairly restrict the organic traffic direct competitors to its specialised search services receive, regardless of the quality and relevance of their content (via self-preferencing in ranking and display, sudden changes to policies for participation such as on on title links).
- Google's approach to SEO performance and the SERP also directly impact the amount of money that businesses need to spend on search advertising (because poor organic performance necessitates more spending on paid ads).
- Google provides a range of tools and inputs that are important to delivering search advertisements. Its unrivalled access to data means that often rival tools are simply not of comparable quality.

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?

Since the public launch of ChatGPT in 2022 (and the subsequent integration of the model into Bing's search engine), there has been much speculation over whether generative AI applications will fundamentally change the way in which users search for information altogether. Whilst ChatGPT and other large language models have been popular for users, two-and-a-half years later, no competitor has made a noteworthy dent into Google's dominance in general search.

Instead, Google has heavily invested in the development and deployment of AI on its own search service, doing so by drawing on profits from its dominant position in search and the resulting vast amount of data available to it. Google has achieved significant vertical integration in AI, controlling every step of the AI value chain including data input, cloud computing and data processing infrastructure, and partnerships across the ecosystem, down to the deployment across search and mobile ecosystems.

As the CMA has noted, Google has integrated AI into its search engine in several ways, including by displaying AI overviews at the top of some SERPs. While it is too early to draw definite conclusions about the way in which this affects traffic to Skyscanner, we are concerned that Google could leverage these features to further self-preference its own specialised search services.

Other players in the travel market have seen an adverse impact on their business – for example, Kayak CEO Steve Hafner recently (January 2025) told Forbes that Google's AI overview has resulted in less traffic to Kayak's site, which the company is attempting to compensate for by bidding more on the first few sponsored links below the AI overview on the SERP. This is a further example of why it is important to consider general search and search advertising jointly, as the CMA is doing, as Google's behaviour in one activity can have direct (and costly) consequences in the other.

Moreover, as more users begin to utilise AI-driven tools for search (which includes 'traditional' search engines like Google's that integrate AI features, as well as AI assistants such as Gemini), Google is likely to gain even more valuable data from the way users interact with them. Such data adds to the vast and incomparable data repository that is already at Google's fingertips and can then be unfairly used by Google to further optimise its own services to an extent that competitors cannot.

On balance, we think it is more likely that the development of AI features will further entrench Google's dominance in search, rather than challenging it, given its unique position to influence how AI-enabled search develops.

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?

We believe that the issues identified in this section are exactly the right ones. We have first-hand experience of the fact that Google is using its general search service to self-preference its own specialised search services over competitors', rather than competing on the merits. Google does so in a variety of ways, including but not limited to: the design of the SERP; its operating policies for appearing on the SERP; and opaque ranking algorithms that seemingly disproportionately benefit Google's own products. As mentioned above, Google's dominance in search advertising only compounds such effects. Not only does this unfairly deprive us of traffic, but it disempowers consumers, who are not easily able to choose the best service for their needs.

We also believe that Google is using the data it collects from the billions of users of its general search service to gain an insurmountable advantage in specialised search, leveraging its dominance in general search to gain dominance in specialised search - possibly in ways that many users do not understand their data is being used for. We have elaborated on our views on the CMA's potential interventions in these areas in response to Questions 5 and 6.

The CMA should also investigate whether Google is using (or could in future use) its dominance in search and search advertising to disadvantage competitors in more subtle ways than blatant self-preferencing. Like many digital businesses, Skyscanner uses several of Google's tools and inputs for its services. [...] We see this as a real risk in areas in which we are direct competitors of any Google service and would welcome the development of measures to prevent such conduct outright.

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?

We do have evidence that a ban on self-preferencing can be effective, proportionate, and beneficial for users, following the implementation of Article 6(5) of the DMA in the EU.

Effective

[...] This is because of the removal of the Google Flights widget, and the fact that we have invested a significant amount of resource into an SEO strategy that prioritises high quality content and a technically sound website.

[...] We believe that, in general, the best performing organic results should appear higher up the SERP (with the caveat, detailed elsewhere, that there must be guardrails in place to prevent Google from simply re-gaining its lost traffic by unfairly leveraging its dominance in general search and access to data to ensure that Google Flights once again appears at the top of the SERP via organic results).

It should also be noted that the impact we have seen is only from Google partially complying with Article 6(5) (in our view – see below).

Proportionate

Self-preferencing prevents users of Google Search from choosing freely and easily between the services of Google and those of competitors. It distorts the market and diverts traffic towards Google's specialised search services and away from potentially more relevant and higher quality organic results below. Banning self-preferencing would therefore be proportionate to achieving the objective of open choices, since it is the only way to achieve it.

That is because the commercial incentives for Google to self-preference are too strong, and only a ban imposed by the CMA will see Google change its ways. By placing its own specialised search services above the organic results, Google ensures that the only way for competitors to boost their visibility to consumers (given that 80% of traffic

goes to the top three search results) is by paying for a search ad. Google would have no incentive to stop self-preferencing without regulatory intervention.

Benefits for users

The benefits for some business search users from a ban on self-preferencing should be fairly immediate. [...] This should, in turn, allow these firms to invest more money into their service and improve it further.

The most important benefits for consumers are likely to be more long term. As markets become more contestable, and the best products and services receive their rightful share of traffic, these services will have more money to reinvest in their services and to continue to innovate. This will, in turn, require Google itself to continue to improve its own specialised search services, rather than simply relying on the fact that it can use its control of general search to funnel traffic to its specialised search service.

As traffic is once again more reflective of merit and the quality and relevance of individual services, it will also become easier for innovative new services to emerge and scale, with their success determined purely by how popular their product becomes.

In short, consumers will over time enjoy more choice, better quality products, and lower prices (since services will not need to spend money on search advertising merely to counteract the effect of Google's self-preferencing).

In travel search specifically, there is another benefit for consumers. Travel metasearch sites like Skyscanner cater particularly to the most cost-conscious consumers. The ban on self-preferencing will ensure that these consumers can get an accurate overview of all the different offers available to them, across multiple sites if needed. Ensuring greater market transparency for these users will mean that it is less likely that they spend more money than needed when booking travel, by reducing the likelihood that they miss a cheaper offer on a competing site.

Beyond a ban on self-preferencing, we believe it is absolutely essential that the CMA addresses Google's insurmountable data advantage, and its blatantly unfair use of such data.

In particular, any ban on self-preferencing in ranking would be rendered much less effective if Google is able to use the data it is party to from the operation of Google Search, and the data it has access to from competitors' use of Google Search, to gain an unfair advantage in SEO optimisation for its specialised search services and place them back at the top of the SERP. The data advantage that Google has through its operation of Google Search is unsurmountable for competitors, considering that Google Search received 3.209 billion unique users in September 2024 (according to SimilarWeb), while we had around 110 million. Google is also in the unique position of having sight of the data generated by its competitors' use of Google Search, which it can use to improve and optimise its competing specialised search services.

A requirement not to share user data across Google's services is therefore proportionate (since there is no way for a level playing field to be achieved without it) and it is a pre-requisite for the effectiveness of other conduct requirements.

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?

As the CMA is aware, Alphabet was designated as a gatekeeper under the European Union's Digital Markets Act (DMA) on 6 September 2023. Alphabet's eight Core Platform Services, which must comply with the relevant provisions of the DMA, include Google Search and its online advertising service.

Since March 2024, Google Search has had to comply with Article 6(5) of the DMA: *'the gatekeeper shall not treat more favourably, in ranking and related crawling and indexing, services and products offered by the gatekeeper itself than similar services or products of a third party. The gatekeeper shall apply transparent, fair and non-discriminatory conditions to such ranking.'*



In the Commission’s designation decision, it made clear that results from Google’s online intermediation services (or specialised search services) that are provided through Google Search constitute a distinct or additional online intermediation service from Google Search (even when the results are embedded in the SERP, are ranked alongside other results, or appear alongside them on the SERP).

This means that the Google Flights and Google Hotels widgets, as previously integrated into the SERP in the EU (and still present on the UK SERP), were deemed to constitute a separate service or product offered by Alphabet, and therefore subject to Article 6(5).

In response, Google has removed the Google Flights widget from the EU SERP. This was absolutely essential, in our view, for Google to comply with Article 6(5), given that the widgets (which serve as links to Google’s separate specialised search services) self-preference in terms of both ranking (they consistently appear ahead of organic results and are subject to a separate ranking algorithm) and display (the link is enhanced with a multitude of features that increase its appeal to users and that are not available for other firms’ links). A similar requirement to remove these widgets should form part of any self-preferencing ban in the UK.

However, Google has attempted to re-create the effect of its dedicated Google Flights widget (which allowed users to complete a large part of their specialised search directly on the SERP, making the travel search market much less contestable for existing competitors and new entrants) by simply adding some of the key features of the widget to the main SERP. This is a clear attempt to exploit the way in which the DMA draws the line between general search and specialised search (or online intermediation services): if the features now form part of general search, then there is no longer any form of self-preferencing of a separate service occurring (according to Google).

This is most obvious if we consider Google’s approach to the ‘dates’ chip (filter). This feature allows users to easily input and alter their desired travel dates, usually by means of scrolling through a calendar. It is a central feature of a specialised travel search service, and it is present within the Google Flights or Google Hotels widget. When Google was forced to remove these widgets in the EU, it decided to re-introduce the ‘dates’ chip to the top of the SERP. The chip operates the same as before, although now it updates all the results on the SERP, rather than just the airline results shown in the Google Flights widget.

Flights to Barcelona : Flights Airports Flight status

Find flights on: Skyscanner Kayak Expedia Cheapflights

London (all airports) Barcelona, Spain (BCN)

Sat 1 Feb Sun 2 Feb

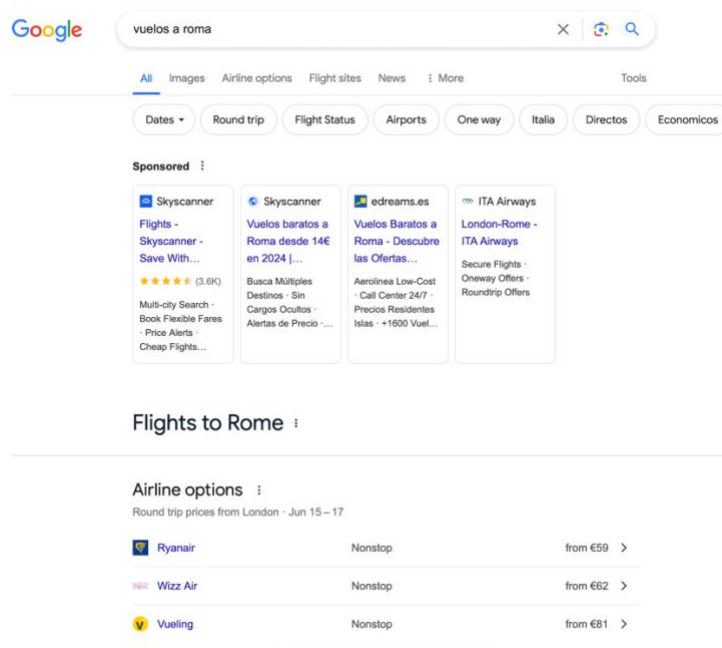
Economy Round trip Nonstop Less emissions

Jan Feb

Carrier	Duration	Stops	Price
Ryanair	2h 10m	Nonstop	from £30
Vueling	2h 5m	Nonstop	from £66
easyJet	2h 10m	Nonstop	from £124
Iberia	2h 5m	Nonstop	from £133

Show flights →

The Google Flights widget, with dates filters, airline results, pricing information, and price graph.



Google's March 2024 DMA solution, with the 'Dates' chip at the top of the SERP, and many of the same features of the former Google Flights widget.

Google has followed the same approach to other features. While removing the Google Flights widget, which listed the airlines flying a given route in a table format, along with information on whether they flew directly or via a connecting airport, and a live and bookable price, they introduced a new 'airline options' unit which contained the following features: a list of the airlines flying a given route in a table format (and with originally up to 10 lines, but this was reduced down to three following feedback); live and bookable prices (again, changed to indicative 'from' prices following feedback); and information on whether an airline flies direct or via a connecting airport.

While the 'airline options' unit does not link off to Google Flights, Google has in effect sought to simply turn the whole SERP into a specialised search service for flight queries, meaning that the effect is the same: users can still perform a large part of their specialised flights search on the SERP.

The CMA is therefore right to consider the entirety of the SERP as in scope of the investigation. We believe that the harm to consumer choice and competing businesses is significant enough to warrant the imposition of a Conduct Requirement banning self-preferencing. But the CMA should not simply consider whether Google has severed any additional links off to its separate specialised search services or ended its most egregious forms of self-preferencing when assessing compliance. It has to consider the SERP in the round.

There are a range of approaches that Google could take to complying with a ban on self-preferencing, and we believe that, given the CMA has the power to be much more directive than the European Commission, it should not simply seek to import Google's DMA solution to the UK. Any new dedicated units for direct suppliers, such as airlines, should be carefully scrutinised to ensure they are not simply an attempt to maintain a specialised search service integrated directly into the SERP (and to keep users in Google's ecosystem for as long as possible).

Google has also tried to pit different stakeholders against each other, without the ability to meaningfully challenge their narrative or test the extent to which their solution is complying with Article 6(5), because of a significant lack of transparency. Third party stakeholders have had no sight of the results of Google's own testing, and it has not been required to test different compliance solutions. Google should be required to share its testing data with third parties, and also to provide access to data demonstrating the impact of any new units or SERP features on traffic



(for example, it is currently not possible for us to accurately know how much traffic we receive from the new 'flight sites' unit in the EU, split out from the traffic we receive from our organic results).

Similarly, any ban on self-preferencing will be worthless if there is no transparency regarding the ranking algorithm, since Google could simply either manipulate the ranking algorithm to place its specialised search services in the top position or use its access to data generated via Google Search (including from competitors) to rapidly optimise its SEO landing pages in a way that is not possible for other businesses.

Finally, it is vital that there is clarity regarding the metrics that the CMA will use to assess compliance and effectiveness. This lack of clarity under the DMA has made it very hard for third-parties to hold Google to account, and to spot issues in the market.

Imposing a ban on self-preferencing in the UK is vital to ensuring the effectiveness of Article 6(5) in the EU, and to protecting UK consumers and businesses.

However, as for the reasons outlined above, the CMA should not seek to allow Google to simply replicate its sub-optimal DMA solutions in the UK. We believe that the CMA can be more ambitious for UK growth and innovation, and use its ability to be much more directive to prevent Google from doing things (such as introducing a 'dates' chip to the whole SERP), and to test and trial multiple compliance solutions.