

# Search has only been the start

Stuart Coleman & Konrad Kollnig

**We thank the CMA for the opportunity [to respond to their investigation of Google Search](#), and do so *in our individual capacity* as UK and EU citizens who think online search is ripe for reimagining.**

Stuart Coleman is a Director at the Open Data Institute. His expertise stems from having worked for many years in the tech sector, investment community and innovating with data standards, most notably working with Professor Sir Nigel Shadbolt, HM Treasury and the No10 Policy Unit in 2014 to conceive a vision for open banking – ahead of CMA taking that forward as a data access remedy in 2016. Dr Konrad Kollnig is Assistant Professor at Maastricht University. His expertise stems from being a worldwide recognised expert in applying technology to regulate online platforms and in opening up platform data to improve competition. He holds a DPhil in Computer Science from the University of Oxford on the subject. To this end, he just finished writing a peer-reviewed monograph titled ‘The App Economy: Making Sense of Platform Power in the Age of AI’. However, we both respond in our individual capacity, not necessarily representing the views of our employers.

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The UK and EU have both been struggling with economic growth with a year on year decline in recent years. By contrast, the US has been rushing ahead, mainly *‘because their technology sector was so successful.’*<sup>1</sup> In opening up search data and online infrastructure, we see a unique window of opportunity to unlock growth and innovation in the UK. This opportunity can also extend to all corners of the economy:

- enabling *small businesses* that currently rely on Google Search Ads but have to pay a high monopoly tax on those ads,
- levelling up opportunities for young *high growth tech businesses and AI researchers* that currently struggle to match Google’s enormous advantage in data and, critically,
- protecting an *independent press* that has become reliant on the ads served mainly by Google on the internet outside of social media.

Citizens and consumers will ultimately benefit. The early examples of search innovation we are seeing with a new genre of AI tools (although mostly from the US) could be scaled, localised and more widely distributed stimulating a new era of productivity and smarter collaboration between people and machines in the workplace and in all our daily lives. The opportunity to make the web generate value for ‘everyone’ is very much alive. Yet, we need to grasp it. In response to this CMA call, we have a variety of suggestions on how market interventions could help and promote UK growth:

1. **Make search data available – but *smartly*.** The EU already focused on opening up click-and-query data under the DMA but is held back by the practical implementation. Google repeatedly cites privacy issues, which we believe can be overcome. As found

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<sup>1</sup> Mario Draghi (2024): The future of European competitiveness

in the CMA's own work, online platforms regularly invoke privacy and security arguments opportunistically (see, e.g., the CMA's Mobile Ecosystems market study). Additionally, online search requires additional data sources, including a knowledge graph and a search index. Both knowledge graphs and the search index are key ingredients to building competitive AI models, as evidenced by the increasing use of Retrieval Augmentation Generation<sup>2</sup> in AI products to keep them up-to-date.

2. **Iterate fast – and from the bottom up.** Rather than follow a top-down approach like the EU, the UK has the unique opportunity to take a 'nimble enough' approach – convene critical stakeholders (most notably target users in research, development and startup communities) to rapidly design, test and iterate what a data release could and should look like and connect these data to some of the world's best AI and knowledge engineers based in the UK. This does not have to be all data all at once, and should initially be done in a controlled, incremental manner and in a protected environment (much like Trusted Research Environments, in which the UK is a world leader). In parallel, longer term legal and sociotechnical governance models for institutionalising access to these should be considered. A lot of lessons have been learned from Open Banking, so that the UK is in a unique position now to implement data access remedies. There is the opportunity to build a powerful contrasting approach to the US – *'models trained on high-quality data outperforming those trained on unvalidated data, even when trained with a smaller quantity of data.'*<sup>3</sup>
3. **Align UK strategies on data access across regulation, competition and AI.** The UK's ability to harness AI for industry, government and to reimagine its position in a new world economic order will be constrained by the data it can access and its ability to demonstrate governance and innovation in the use of these data by AI systems. Imagine the transformative potential if the UK could harness the power of accessing a comprehensive web data index in conjunction with its AI Opportunities Action Plan and with Smart Data sources across a wide range of sectors in the UK. Additionally, integrating access to this vast resource with the proposed National Data Library and AI Research communities, the UK could supercharge AI research and development capabilities, driving breakthroughs across sectors. This approach would not only fuel AI innovation and research but also ensure fairer competition, standardised data practices, and enhanced public services, helping position the UK as a global leader in responsible data and AI innovation – encouraging other countries to collaborate and potentially adopt comparable approaches.
4. **Separate the Chrome browser from Google.** As Dr Kollnig pointed out in widely received research,<sup>4</sup> Chrome gives Google an unfair advantage in both online services (including search) and online ads. This impedes UK businesses seeking to compete fairly in both online services and ads. The suggestion was picked up by the US Department of Justice who now see Chrome's divestment as one of the most

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<sup>2</sup> [https://en.wikipedia.org/wiki/Retrieval-augmented\\_generation](https://en.wikipedia.org/wiki/Retrieval-augmented_generation)

<sup>3</sup> <https://arxiv.org/html/2409.16341v2>

<sup>4</sup> A summary is available here:

<https://www.promarket.org/2024/08/08/chrome-is-the-forgotten-fulcrum-of-googles-dominance/>

The full paper is here: [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=4780718](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4780718)

important remedies against Google's monopoly in search.<sup>5</sup> It is difficult to estimate how the US will proceed in the case, which makes it important for the UK to consider equivalent remedies in case the US case is not successful.

Today, search is dominated by ads. Search quality has stagnated<sup>6</sup> and the way we search has seen almost no change in the past 20 years. Advances in AI have shown there exist alternative – and often faster, cheaper and better – ways to generate value from transforming data on the web into information and knowledge for users, thereby reducing the cost for everyone in obtaining the information that we need. Without intervention, the independent press will stay one of the most important losers of the platform economy towards online ads.

It is arguable that in 1998 Google's cofounders were prophetic: *'The goals of the advertising business model do not always correspond to providing quality search to users... advertising funded search engines will be inherently biased towards the advertisers and away from the needs of the consumers.'*<sup>7</sup>

**Given the size of the challenges relating to growth in the UK (digital) market, it is time to act, and do so in a bold manner.**

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<https://storage.courtlistener.com/recap/gov.uscourts.dcd.223205/gov.uscourts.dcd.223205.1062.0.pdf>

<sup>6</sup> [https://dkb.io/post/DEPR\\_google-search-is-dying](https://dkb.io/post/DEPR_google-search-is-dying)

<sup>7</sup> <http://infolab.stanford.edu/pub/papers/google.pdf>