

Submission to the UK Competition and Markets Authority (CMA) Regarding Google's User Interface Changes Under SMS Designation

From: easyJet Airline Company Limited

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Subject: Comments Regarding Potential Changes to Google's User Interface and the Impact on easyJet and Its Customers

Introduction

easyJet appreciates the opportunity to submit comments to the UK Competition and Markets Authority (CMA) regarding the ongoing strategic market status (SMS) designation investigation into Google's General Search and Search Advertising services. Our submission is informed by our experiences following similar regulatory changes in the European Union under the Digital Markets Act (DMA), specifically clause 6.5.

Overview

The consequences of the implementation of the DMCCA can have a significant impact on airlines' ticket distribution. It is crucial that airlines' perspective is taken into careful consideration. Airlines' offers should be distinguished from the ones of OTAs/intermediaries. This would maintain high-quality search results which meet the highest standards, while providing consumer with a useful, helpful, and informative experience.

1. Impact on Customer Experience and Direct Sales

The DMA-induced changes in the EU led to a significant shift in traffic from Google Flights to other Vertical Search Services (VSS) such as Online Travel Agencies (OTAs) and Metasearch Engines (MSEs). This shift has diluted easyJet's direct web sales, impacting our ability to offer customers the best value and service.

2. Compliance and Risk Exposure

Some OTAs do not comply with easyJet's Distribution Charter, particularly concerning the accurate representation of prices and ancillary products. This non-compliance exposes our customers to potential overcharges, especially for additional services like baggage. Increasing the visibility of such OTAs over direct airline results may mislead customers, leading to a poor customer experience and potential brand damage.

3. Operational and Communication Challenges

In the best cases, OTAs can enhance the value of airline offerings by integrating flights with accommodations, car rentals, and unique experiences, creating a comprehensive travel package. However, the major issues we see with some OTAs are screen scraping, **providing false contact details** that hinder airline communication with customers, leading to **significant disruptions at the airport**, and charging for services that airlines provide for free. This not only affects customer satisfaction but also impacts our on-time performance (OTP) and overall customer service ratings (CSAT).

Conclusion

easyJet hopes that the CMA will give careful consideration to the real-world impacts of similar

regulatory changes in the EU as it investigates Google's practices. We believe that there are lessons that can be drawn from the measures adopted in the EU and we advocate for a balanced approach that considers the needs of both consumers and airlines. Ensuring that airlines can compete fairly on platforms like Google is crucial for maintaining a competitive market that ultimately benefits consumers through better prices and services.

We are committed to engaging constructively with the CMA and other stakeholders to find solutions that protect consumer interests and promote a healthy, competitive market.

Submitted by: [REDACTED] easyJet Airline Company Limited