



22 July 2025

Object: ITC Response to SMS Investigation into Google General Search

Dear Sir/Madam,

Please find enclosed a submission from the Consumer Choice Center (CCC) regarding the CMA's investigation into designating Google Search as a SMS.

As the UK Country Associate for the Consumer Choice Center, please do not hesitate to contact me at any stage for further information or discussion on consumer interests and rights.

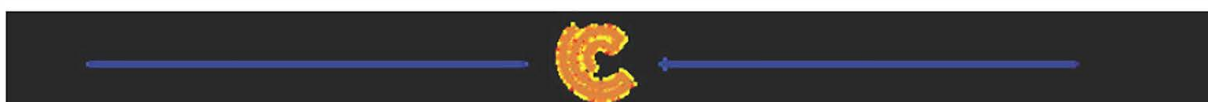
Yours Sincerely,



Mike Salem

UK Country Associate

Mike@consumerchoicecenter.org





About the Consumer Choice Center:

The Consumer Choice Center is a non-profit organisation dedicated to defending the rights of consumers around the world. Our mission is to promote freedom of choice, healthy competition and evidence-based policies that benefit consumers. We work to ensure that consumers have access to a variety of quality products and services and can make informed decisions about their lifestyle and consumption.

As an independent nonprofit organisation, the Consumer Choice Center relies on the support and funding from private donors. As described in our Code of Ethics, we strictly maintain editorial independence and do not give our funders any influence on editorial decisions. Our support comes from corporations, individuals, and foundations. We have a tiered membership model available to members who support us on a yearly basis, equalling silver, gold, and platinum status.

In the past and currently, we have received funding from multiple industries such as energy, fast moving consumer goods, nicotine, alcohol, airlines, agriculture, manufacturing, digital, healthcare, chemicals, banking, cryptocurrencies, and fin-tech.

Find out more at www.consumerchoicecenter.org

About the Author:

[Mike Salem](#) is the UK Country Associate of the Consumer Choice Center (CCC). He can be reached via email at Mike@consumerchoicecenter.org





Written evidence response to the consultation regarding the SMS Investigation into Google Search:

Scope of the Investigation:

- **Network effects drive Google:** Google's popularity isn't due to anticompetitive behaviour, but the virtuous network effect, meaning more users enhance search quality which leads to a net consumer benefit. The CMA underemphasises this.
- **Consultation timeline too short:** The wide scope and broad proposed remedies require more time to properly engage consumers, businesses, and stakeholders.
- **Usability concerns:** The dense, technical detail deters public participation. A clearer, more accessible consultation process is needed

What Matters Most for Consumers:

- **Define clear barriers to competition:** The CMA must explicitly identify how Google prevents others from entering, beyond citing general scale or data access.
- **Tailor potential remedies:** Not all search functions warrant SMS designation. CMA should focus on search types (e.g., Maps, News, etc.) with less consumer value in standardised designation.
- **Respect data preferences:** Many users value consolidated data experiences and are content with personalised ads. Assumptions about consumer preference for stricter data protection must be tested via direct engagement
- **Investigation is too focused on the supply side:** This investigation has primarily focused on what Search looks like, rather than what consumers are using search for. This risks overlooking core user needs.
- **AI and copyright:** The CMA should also note that there is a topical political debate on AI and copyright politically, which the CMA cannot resolve and will need to await further decision making by policy makers and legislators. Taking a position on AI-related copyright issues at this early stage risks pre-empting parliamentary decisions and could complicate future CMA assessments.

CCC Recommendations:

- **Targeted ranking transparency,** not rigid quotas to enable understanding without dictating exact placement.





- **Choice screens**, like those recently used for mobile browsers, should be optional and privacy-preserving.
- **Data portability** must balance enabling innovation with protecting consumer privacy and user experience.
- **Delaying** the designation to coincide with an AI adoption review would prevent misaligned or obsolete CRs.

Conclusion:

The CCC supports the CMA in its mission of enhancing choice and competition. But technological dynamics and consumer perspectives demand a measured approach. A stronger consumer evidence base and flexible, proportional conduct rules will ensure enduring benefits without risking unintended consequences for innovation and UK competitiveness. The CCC is always willing to engage with the CMA and DMU to ensure that consumer voices are represented and please do not hesitate in reaching out for future collaboration.

