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**CMA Submission:**  
**Kelkoo Group Response to**  
**Draft Google SMS Designation**  
**and Proposed Roadmap**

**1. About Kelkoo Group**

Kelkoo Group operates comparison shopping services; a form of vertical search service, which allows consumers to search for and compare products and retailers to make the best shopping choices. We are headquartered and operate within the UK, as well as thirty-eight other countries around the world.

**2. Summary**

The proposed designation decision

- 1.2 Kelkoo Group supports the CMAs proposed decision designating Google as having significant market status in relation to its general search service. The description of services like vertical search, which operate in related markets to general search, is generally well set out, though in some areas the document conflates two separate markets – the comparison shopping market, which is a form of vertical search and a market in which Kelkoo Group operates, and the market for online retailers and merchant platforms like Amazon. These two markets are distinct (and in fact retailers and marketplaces are customers of comparison shopping services) and the decision should reflect that.

Proposed roadmap

- 1.3 The proposed roadmap allows for interventions in Category 1, which could deal with Google's discriminatory self-preferencing by ensuring non-discriminatory ranking principles are implemented by Google and applied to its treatment of vertical search services. Kelkoo Group is very supportive of this approach, and is keen to see this long-standing 'low hanging fruit' dealt with promptly - rather than waiting for Category 2 measures to be implemented. This approach would ensure that consumers can enjoy the benefit of competition in vertical search sooner.

**3. The Proposed Decision**

- 2.1 In general, we consider that the proposed decision correctly captures Google's position in the market for general search services and its significant market status. It is abundantly clear that Google's market position gives it enormous power, both over consumers who depend on search to access information and over business users who depend on general search to make their businesses visible to those consumers.
- 2.2 We also consider that the proposed decision correctly characterises the relationship of vertical search service with general search. Vertical search services, such as comparison shopping services and travel search services, are distinct from general search services - but are often

significantly dependent on general search services to reach consumers. At the same time, the way Google currently operates its services means that vertical search services are often embedded in the search engine results page (“SERP”) and presented as though they are general search results. The proposed decision correctly captures this.

- 2.3 Our only area of concern is that the proposed decision is inaccurate in its frequent characterisation of Amazon as a vertical search service. Whilst it is not crucial for the decision at hand, relevant interventions in line with the proposed roadmap will depend on the definition of the relevant services in order to determine whether Google ranks its own services fairly against others, and we consider it would be helpful to avoid mischaracterisation by Google.
- 2.4 At paragraph 5.13, Amazon is correctly described as ‘a retailer which enables users to search for products’; swapping the word ‘retailer’ for ‘retailer and marketplace’ would also be a fair and reasonable characterisation. However, in many other places it refers to Amazon as a ‘vertical search service’<sup>1</sup>. Simply including a search functionality in a website does not make something a vertical search service and, whilst it is clear that Amazon and Google both seek to attract the attention of users looking to buy products, they operate quite different services in shopping - Google operating a comparison shopping service and Amazon operating a (very broad-based) retailer and marketplace.
- 2.5 This issue has been considered at length by regulators and courts: in particular, the European Commission in its Google Shopping Decision<sup>2</sup>, the European Court of Justice in Google’s appeal against the Google Shopping Decisions<sup>3</sup> and the Competition Appeal Tribunal in its consideration of the meaning of the Google Shopping Decision<sup>4</sup>. In all cases, it was found that the market for comparison shopping services (which Google competes in and has abused through its self-preferencing behaviour) was distinct from the market for retailers and marketplaces. We would therefore suggest that other reference points could be used for vertical search services.

#### 4. The Proposed Roadmap

- 3.1 Comparison shopping services and other vertical search markets have been the subject of discriminatory self-preferencing by Google for many years (even decades, in relation to comparison shopping). Google still embeds its own comparison shopping service into the SERP, and fails to give fair or equal treatment to rivals. This has resulted in reduced consumer

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<sup>1</sup> See by way of example paragraphs 1.17, Box 1 on page 45, paragraph 5.13 and paragraph 5.50. This is a non-exhaustive list of examples.

<sup>2</sup> [https://ec.europa.eu/competition/antitrust/cases/dec\\_docs/39740/39740\\_14996\\_3.pdf](https://ec.europa.eu/competition/antitrust/cases/dec_docs/39740/39740_14996_3.pdf) – in particular, sections 5.2.1.2.2, 5.2.2.3 and 5.2.2.4.

<sup>3</sup> <https://curia.europa.eu/juris/document/document.jsf?text=&docid=289925&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=1895397> – see paragraphs 466-495

<sup>4</sup> <https://www.catribunal.org.uk/sites/cat/files/2025-07/14245721%3B%2015895723%20%28T%29%3B%2015965723%3B%2016365724%20%28T%29%20%20Judgment%20%28Preliminary%20Issue%29%20%5B2025%5D%20CAT39%209%20Jul%202025.pdf> – see paragraphs 33-40.



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choice, higher advertising prices for retailers, and ultimately a worse deal for consumers. Kelkoo Group is therefore keen to see this long-standing discriminatory treatment dealt with as soon as possible - for the benefit of all UK consumers who buy goods online.

- 3.2 We are pleased to see that the proposed roadmap allows for rapid interventions in this area, with proposed Category 1 measures which could, if implemented correctly, address self-preferencing issues through principles of fair ranking. Based on our experience in other jurisdictions, such principles will need to be specific enough to require action by Google. Generic principles requiring fair ranking are likely to be met with inaction in relation to the most serious breaches of fairness by Google; that is, its continuing self-preferencing on the SERP.
- 3.3 We strongly support taking measures in Category 1 to address these longstanding issues, rather than waiting for Category 2 measures to be implemented. Consumers have waited long enough for the benefits of competition in vertical search, and deserve to benefit from better tools, greater choice, and lower prices that competition in this space will bring.

We would, of course, be happy to discuss any of the above and to provide further details as needed. Please contact [REDACTED] for any further information or clarification.