

APPENDIX A: Summary of third parties' evidence

- A.1 In this Appendix we describe the third parties we gathered information from for the SMS investigation, both prior to the publication of the Proposed Decision and since its publication. The analysis of this third-party evidence is set out in the Final Decision and the other Appendices.
- A.2 We received responses to requests for information (**RFIs**) from 80 different third parties.¹ We also received information from:² respondents to the Invitation to Comment (**ITC**), respondents to the consultation on the Proposed Decision, participants in our roundtable events, parties we had calls with, digital experts and other government/regulatory authorities.
- A.3 The third parties who responded to RFIs prior to the publication of the Proposed Decision can be grouped as follows:
- (a) Other traditional general search providers;
 - (b) Advertisers;
 - (c) Specialised search providers;
 - (d) Media agencies;
 - (e) Providers of AI assistants;
 - (f) Publishers;
 - (g) Browser providers; and
 - (h) OEMs.
- A.4 After the Proposed Decision consultation we gathered further information from some of the third parties in light of the responses we received. These third parties included: the traditional general search providers, some advertisers and some of the AI firms.
- A.5 The following sections provide details about some of these groups of third parties, including how we selected those to send RFIs to.

¹ Note that we sent requests to more third parties than this in total, but some requests relate solely to the development of potential conduct requirements and so are not discussed in this Appendix, which focuses on the SMS designation.

² Some of these third parties also replied to requests for information.

Advertisers

- A.6 We sent RFIs related to purchasing advertising to three categories of businesses which advertise on Google: advertisers, specialised search providers and media agencies.
- (a) Advertisers are businesses that purchase advertising directly from Google. We selected advertisers to contact based on their advertising spending on Google in the UK, both from 2018 data (provided by Google in the Digital Advertising Market Study) and 2024 data (provided by Google during this investigation). We focussed on customers with the largest expenditure on Google's search advertising in the UK. To ensure that we also gathered evidence relating to shopping adverts, we also selected Google's top customers in terms of spend on Google's shopping adverts. The advertisers that we gathered evidence from covered many different sectors of the economy, including travel, retail and media.
 - (b) Specialised search providers also purchase search advertising directly from Google, and in some cases they are large purchasers of Google's search advertising. We contacted a number of specialised search providers which had previously engaged with the CMA or responded to the ITC. These providers also covered many different sectors of the economy including travel, retail and finance/insurance.
 - (c) Media agencies have a different business model to the other groups; they purchase advertising from Google as agents for their clients which wish to purchase advertising. We selected the largest global media agencies to contact on the basis of information from the Digital Advertising Market Study.
- A.7 Overall, the advertisers and specialised search providers from whom we gathered evidence accounted for approximately [X]% of all Google search ad revenues in the UK in 2024. This included responses from the top 14 advertisers in terms of spend and 18 of the top 20 advertisers by spend. The advertisers we gathered evidence from also covered [X]% of spend on Google shopping ads in the UK in 2024 and included responses from the top 6 advertisers based on ad spend.³
- A.8 The media agencies from whom we gathered evidence accounted for approximately [X]% of all Google search ad revenues in the UK in 2024.⁴

³ Google's consolidated response to the CMA's RFI.

⁴ Google's consolidated response to the CMA's RFI. The denominator for the total amount of Google ad spend was calculated from other data provided by Google in Google's consolidated response to the CMA's RFI.

A.9 Therefore, overall, we have gathered views from a range of businesses which collectively account for around [X]% of Google's search advertising revenue in the UK in 2024.

AI assistants

A.10 We selected AI companies to contact based on publicly available information from October 2024 about the scale of their usage in the UK.