

Strategic market status investigation into Google's general search services

Final Decision

10 October 2025

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The Competition and Markets Authority has excluded from this published version of the final decision information which the CMA considers should be excluded having regard to the three considerations set out in section 244 of the Enterprise Act 2002 (specified information: considerations relevant to disclosure). The omissions are indicated by [X]. Some numbers have been replaced by a range. These are shown in square brackets. Non-sensitive wording is also indicated in square brackets.

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1. SUMMARY

- 1.1 The digital markets competition regime gives the Competition and Markets Authority (**CMA**) the ability to designate a firm as having ‘strategic market status’ (**SMS**) in a digital activity linked to the UK.
- 1.2 Having carried out an investigation and consulted Google and other stakeholders, we have decided to designate Google as having SMS in the provision of general search and search advertising (together, **general search services**). This document explains the reasons for our decision.¹
- 1.3 Our finding that the criteria for SMS designation are met does not find or assume wrongdoing and does not make any assumptions about the next steps after designation. The SMS assessment is purely focused on the power and position of the firm in respect of the digital activity being investigated. It is an important step as designation is the gateway to possible interventions, but Parliament clearly separated the assessment of designation from the assessment required for the imposition of such interventions, which are subject to separate legal processes.

Why Google’s position in general search services matters

- 1.4 General search services are a key gateway through which people access and navigate the worldwide web, and businesses and content creators can reach consumers. They are relied on by almost all people and businesses in the UK as a source of information and channel for accessing content. Although people can use Google and other general search providers for free, these services are paid for through search advertising, the costs of which are ultimately borne by businesses and their customers.
- 1.5 Google has long had a commanding position in this space. The term ‘to Google’ is commonly used to describe the act of web search, and ‘Google.com’ is one of the most common search queries on Bing, Google’s main search competitor. Google Search accounts for more than 90% of all general search queries in the UK,² and over 200,000 firms in the UK collectively spent more than £10 billion on Google search advertising last year.
- 1.6 Given the importance of the sector as a core digital tool for people and businesses, there is a premium on ensuring that consumers and businesses are treated fairly, can have confidence in the way they interact with Google in search, and that competition works well. Effective competition would enable people to benefit from greater choice (for example, in which search service they use), new

¹ We have also published an ‘SMS Decision Notice’ on the case page: [SMS investigation into Google's general search and search advertising services - GOV.UK](#).

² Measured by queries to traditional general search providers and search-grounded AI queries.

and innovative services (for example, AI-based services), and greater control over their data.

- 1.7 Search services have also become important to people as citizens, not least as a key route through which they access news. A better-functioning market could help ensure that people can access a wide range of high-quality, accurate content which is attributed effectively, and that publishers are treated fairly where their content is used in search.
- 1.8 For businesses, effective competition in general search would help keep down the costs of search advertising, in turn leading to lower prices across the economy. And a competitive environment would allow businesses to innovate in a way which creates alternatives to traditional search services, including by, for example, ensuring that new AI start-ups can compete with Google and other existing players on an equal footing.
- 1.9 Designating Google with SMS enables us to consider proportionate, targeted interventions to ensure that general search services are open to effective competition, and that consumers and businesses that rely on Google can have confidence that they are treated fairly. Before introducing such interventions, we are required to carry out further public consultation on their terms and impact.

International context and growth of AI-based search

- 1.10 Several competition authorities globally have taken action in relation to Google's general search services in recent years (including the US Department of Justice (**DoJ**), European Commission, Japan Fair Trade Commission (**JFTC**) and Australian Competition and Consumer Commission (**ACCC**)). Although our SMS investigation is focused on Google's activities in the UK, Google's general search services operate globally, and we have sought to learn from international findings in conducting our own investigation.
- 1.11 We have conducted our investigation in the context of a rapidly changing search sector, driven by developments in AI, and we have factored this into our assessment. Google and other search providers are increasingly evolving from being traditional 'search engines' to being 'answer engines', providing information directly in response to user queries. Google has integrated AI features into its general search infrastructure, for example through the addition of AI Overviews to the search engine results page (**SERP**), and the addition of the AI Mode tab to Google Search. We have also seen the rapid emergence of AI assistants including OpenAI's ChatGPT and Google's Gemini AI assistant, which enable users to receive responses to queries based on generative-AI models. ChatGPT in

particular has established a significant user base in the UK, eg in June 2025 ChatGPT received over [1-2] billion queries in the UK.³

- 1.12 In assessing whether a firm has SMS, we are required to take into account expected and foreseeable developments in relation to the digital activity over at least the next five years. We have found that Google's market power is entrenched notwithstanding the context of innovation and change as a result of developments in AI, for the reasons summarised below.⁴ However, we also recognise the rapidly-evolving context, which we will continue to take into account, particularly when considering potential measures we might introduce to promote competition and protect consumers in general search services.

Our decision on description and scope of the digital activity

- 1.13 Under the digital markets competition regime, an SMS designation applies to the 'relevant digital activity', rather than to the whole of a firm's business. This ensures that we take a targeted approach, focusing on the areas where a firm has substantial and entrenched market power and a position of strategic significance.⁵
- 1.14 In line with the statutory timeframe, we have undertaken a nine-month investigation, during which we have gathered a wide range of evidence and engaged with a large number of stakeholders including Google. At the outset we published an invitation to comment setting out the scope and main avenues of investigation. We held roundtables and meetings with a diverse set of organisations, and requested information from 80 market participants. In June, we consulted on our Proposed Decision to designate Google as having SMS in general search services and in July Google had the opportunity to make oral representations to the CMA decision makers on our Proposed Decision.
- 1.15 Having taken into account consultation responses and undertaken further evidence gathering, we have decided to designate Google as having SMS in respect of the provision of: a service that searches the world wide web, and can draw on other sources, to return information on any subject (**general search**); and a service that enables advertising to users of general search (**search advertising**) (together, general search services).
- 1.16 The Google products within the scope of general search services include Google Search, however it is accessed, and all information it returns including through AI Overviews and AI Mode. This ensures that our designation reflects the changing nature of Google's search product. It also includes Google's organic search

³ OpenAI's response to the CMA's RFI.

⁴ Consistent with the findings of the US District Court of Columbia in its recently published *United States and State of Colorado v Google LLC*, Memorandum Opinion of 2 September 2025.

⁵ In certain circumstances the CMA can apply measures outside the scope of the relevant digital activity – eg see [Digital Markets Competition Regime Guidance \(CMA194\)](#), paragraph 3.14.

syndication products, Programmable Search Engine (**ProSE**) and Web Search Syndication (**WSS**), when they provide general search (but not otherwise). The scope also covers Google's advertising products (Google Ads, Search Ads 360 (**SA360**) and AdSense for Search) when they provide advertising to users of general search (but not otherwise).⁶

- 1.17 We recognise and take seriously the concerns expressed by publishers about the impact of Google's general search on the future of independent media, and the importance of such media to society. Following consultation on the Proposed Decision, we have clarified that the Google Search 'News' tab and 'Top Stories' carousel, and Google Discover (which together account for the vast majority of referral traffic to publishers), are within scope of the designation. Google News, Google's smaller, standalone news product, is not within scope because it does not provide general search. However, we retain the ability to intervene in relation to Google News under certain circumstances, such as if Google were to use its position in general search to unfairly advantage Google News.
- 1.18 We have considered whether Google's Gemini AI assistant also falls within the scope of general search services where users are asking it for information, including taking account of views and evidence provided in response to our Proposed Decision on this point. We have found that the Gemini AI assistant uses Google Search results as one of many inputs to produce a response to a user prompt. It is being used in some cases, by some users, to perform a function akin to general search. However, the evidence is mixed, and the AI assistant sector is relatively small, nascent, and highly dynamic. As such, we have decided that, based on how it is currently offered and used, the Gemini AI assistant does not at this point in time fall within the scope of the relevant digital activity.
- 1.19 However, it is possible that as usage of the Gemini AI assistant develops, it may in future come within the scope of the relevant digital activity. If the CMA in future identifies further evidence indicating that this may be the case, we would carry out a public consultation before deciding whether to bring the 'general search' use cases⁷ of the Gemini AI assistant within scope of the designation.

Our finding that Google has SMS in general search services

- 1.20 The SMS assessment in this document sets out the grounds on which we have concluded that Google has substantial and entrenched market power and a position of strategic significance in general search services.

⁶ The full list of products in and out of scope is set out in the accompanying SMS Decision Notice and at paragraphs 4.9-4.10 below.

⁷ Or, if relevant, 'search advertising'.

- 1.21 In summary, Google has had an unparalleled position in this digital activity for an extended period. Other traditional general search providers are significantly smaller than Google and have been for many years. Bing is the largest of these providers, but its current shares of queries and search advertising are both less than 5%. No traditional general search providers have materially grown relative to Google for at least fifteen years. Specialised search providers, such as Amazon, are a limited alternative to Google's general search services, and social media platforms are not an effective alternative.
- 1.22 A designation lasts for five years, and we are required to take into account expected or foreseeable developments over at least that five-year period. As noted above, in recent years developments in generative AI have led to the emergence of AI assistants such as ChatGPT, and we have carefully considered how these developments could affect Google's position in general search services.
- 1.23 AI assistants have a variety of use cases and, although use of ChatGPT in particular has grown rapidly, use of AI assistants for 'general search queries'⁸ specifically is currently low when compared to Google's general search products, and it is uncertain how the use of these products will evolve. Google is also well-positioned to respond to developments in AI to maintain its market position and to ensure that AI assistants do not develop into a more sustained and significant competitive constraint to its general search services. For example, Google has incorporated generative AI features (such as AI Overviews) directly into its existing products, alongside developing its own Gemini AI assistant.
- 1.24 An important factor in the persistence of Google's strong position in general search services is the barriers that competitors face to developing an effective alternative product. These barriers include Google's distribution agreements (which make it challenging for others to reach users), data advantages and scale in search advertising. Google's strong positions in general search and search advertising reinforce one another, with more users helping Google to monetise its general search services and to invest in its general search services.
- 1.25 Google's wider ecosystem of products also plays an important role – providing it with access to data with which it can tailor its products in ways that others cannot and providing it with influence over important access points to users. For example, Android and Chrome give Google influence over access points to general search and provide Google with access to data which may not be available to others. Many of these barriers also apply to AI assistants that could compete with Google's general search services.

⁸ We have gauged this by the volume of queries to AI assistants that are 'grounded' using search infrastructure since this is the subset of use cases where an AI assistant is most likely to be competing with Google's general search.

- 1.26 Accordingly, we have found that Google has substantial and entrenched market power in general search services.
- 1.27 We have also found that Google has a position of strategic significance, based on its significant scale and the very large number of other firms across the UK that rely on it. More specifically, Google's general search services are used on a daily basis by a very large number of users (eg Google Search receives [5-10] daily queries per UK citizen^{9,10}) and Google's general search services are important to a wide range and large number of other businesses in the UK (eg in 2024, over 200,000 unique entities used Google's search advertising in the UK¹¹).
- 1.28 We are therefore designating Google as having SMS in general search services with effect from the date of this Decision. As set out in the SMS Decision Notice published on the case page,¹² the designation will last for five years, subject to the potential for the CMA to revoke or extend the designation.

⁹ Google's consolidated response to the CMA's RFI.

¹⁰ Based on a UK population estimate of 68,265,200 for mid-2023. See: ONS, 'United Kingdom population mid-year estimate, 08 October 2024, accessed by the CMA on 03 April 2024. [United Kingdom population mid-year estimate - Office for National Statistics](#).

¹¹ Google's consolidated response to the CMA's RFI.

¹² [SMS investigation into Google's general search and search advertising services - GOV.UK](#).

2. CONTEXT TO THE INVESTIGATION

The UK's digital markets competition regime

- 2.1 The Digital Markets, Competition and Consumers Act 2024 (the **Act**) establishes the UK's digital markets competition regime. The accompanying notes explain:¹³
- 'Businesses operating in digital markets make a very significant contribution to the UK economy. However, it is the Government's view that the unprecedented market power, in relation to certain digital activities, of a small number of businesses, is holding back innovation and growth. Existing competition and consumer laws are not designed to address the unique barriers to competition in digital markets. In response, this Act establishes a new regime that is designed to boost competition in digital markets.'
- 2.2 The Act is the culmination of many years of policy development and consultation.
- 2.3 In September 2018 the government established a 'digital competition expert panel', led by Professor Jason Furman, to consider the opportunities and challenges the digital economy posed for competition policy. The panel's March 2019 report noted that the digital economy has benefited consumers by creating entirely new categories of products and services, and businesses by lowering start and scale-up costs. But it also noted that many digital markets are prone to 'tipping' in favour of a small number of large firms, which can lead to higher prices, reduced choice and quality for consumers and harm to innovation.¹⁴
- 2.4 The panel recommended that 'competition in digital markets should be sustained and promoted through a new approach, alongside the core conventional competition tools of merger control and antitrust enforcement'.¹⁵ It considered that if implemented effectively, this approach would be 'more flexible, predictable and timely' than existing legal regimes.¹⁶
- 2.5 In March 2020 a 'digital markets taskforce' was established to provide advice to the government on the design and implementation of a new regime. The taskforce was led by the CMA, working closely with the Office of Communications (**Ofcom**) and the Information Commissioner's Office (**ICO**). The taskforce reported in December 2020, again noting the benefits created by digital markets but also that 'The accumulation and strengthening of market power by a small number of digital firms has the potential to cause significant harm to consumers and business that rely on them, to innovative competitors and to the economy and society more

¹³ Explanatory notes to the Act, paragraph 3.

¹⁴ The [2019 'Furman' Report](#), pages 3-4.

¹⁵ The [2019 'Furman' Report](#), page 8.

¹⁶ The [2019 'Furman' Report](#), page 2.

widely'. To address these concerns, the taskforce recommended the creation of a new regime applicable to 'the most powerful digital firms'.¹⁷

- 2.6 Having consulted in 2021,¹⁸ in May 2022 the government committed to bringing forward legislation, noting its intent to build 'the bespoke regulatory toolkit required to address the unique issues arising from digital markets' and 'a more flexible and targeted regime that can better support innovation'.¹⁹
- 2.7 The Act came into force in January 2025. In line with the policy development that led to its creation, it establishes a framework that is flexible and forward-looking, reflecting the dynamic nature of the digital economy and providing for intervention in a bespoke and targeted way. It gives the CMA the responsibility of assessing whether firms should be subject to the regime, and if so, whether and how rules should apply to their business. In recognition of the need for clarity on how the regime applies, the CMA published statutory guidance (subject to Secretary of State approval) on how it will approach its functions under the Act.²⁰

Strategic market status: the gateway to the regime

- 2.8 The Act empowers the CMA to designate a firm as having strategic market status (SMS). SMS designation is the gateway to the digital markets competition regime – it will only apply to a firm designated as having SMS in relation to a particular 'digital activity'.²¹ Only the largest firms can be designated: those with turnover greater than £1 billion in the UK or £25 billion globally, thresholds introduced 'to make clear that smaller firms will not be in scope'.²²
- 2.9 To designate a firm which exceeds the turnover thresholds with SMS, the CMA must establish that the firm has (i) 'substantial and entrenched market power' and (ii) 'a position of strategic significance' in respect of a 'digital activity' linked to the UK.

Digital activities

- 2.10 Traditional competition regimes assess market power through the lens of market definition. This involves drawing boundaries by measuring how substitutable products and services are for one another, often using hypothetical models to predict how customers would respond to price increases. This can be a useful tool in many contexts. But in others, it may not reflect the reality of competition. This

¹⁷ 2020 [Advice of the Digital Markets Taskforce](#), pages 2 and 4.

¹⁸ A new pro-competition regime for digital markets ([CP 489](#)). See also the government's July 2021 [impact assessment](#) for the consultation, which notes: 'Government intervention is necessary as the concentration of market power and weak contestability in these markets is unlikely to be rebalanced through market forces or existing regulatory tools.'

¹⁹ The government's [2022 response to consultation](#) on a new pro-competition regime for digital markets, pages 5 and 7.

²⁰ CMA194. The government's [2022 response to consultation](#) on a new pro-competition regime for digital markets, paragraph 46.

²¹ Explanatory notes to the Act, paragraph 94; 2020 [Advice of the Digital Markets Taskforce](#), paragraph 4.7.

²² The government's [2022 response to consultation](#) on a new pro-competition regime for digital markets, page 17.

was recognised during the development of the digital markets competition regime.²³

‘The market power assessment should not require a formal market definition exercise, which results in a binary judgement of whether firms fall inside or outside of the market. Such a rigid approach would fail to recognise the nuanced and interconnected nature of digital products and services and underemphasise the importance of dynamic competition.’

- 2.11 The digital markets competition regime therefore does not use the concept of a relevant market. The explanatory notes to the Act confirm that the assessment of substantial and entrenched market power ‘does not require the CMA to undertake a formal market definition exercise’.²⁴
- 2.12 Instead, the SMS conditions are assessed by reference to a ‘digital activity’ – a bespoke legal concept for this new legal regime.
- 2.13 The advice of the digital markets taskforce was that:²⁵
- ‘In order to retain a targeted, practical and proportionate approach, we do not consider that the entire SMS firm should be assessed when considering SMS designation. Rather we propose the assessment should be applied with respect to a specific activity ... A focus on activities encourages a focus on how a specific firm operates and how the products and services offered by the firm interact. This is appropriate given that the SMS regime is firm-specific.’
- 2.14 In response to its consultation on the regime, the government noted that ‘This approach was generally preferred to linking the assessment to ‘markets’, as would normally be the case in a CMA investigation’; and that ‘Stakeholders agreed that the definition of digital activities needs to allow for flexibility so that the regime can respond to new technological developments and business models, whilst providing clarity for business.’²⁶
- 2.15 Rather than setting out definitions of products or services that the CMA must apply, the Act therefore requires the CMA to describe a digital activity carried out by the relevant firm.
- 2.16 The Act allows the CMA to treat two or more digital activities carried out by a firm as a single digital activity – to ‘group’ what would otherwise qualify as separate

²³ 2020 [Advice of the Digital Markets Taskforce](#), paragraph 4.14. See also the government’s July 2021 consultation document, A new pro-competition regime for digital markets ([CP 489](#)), paragraph 54.

²⁴ Explanatory notes to the Act, paragraph 109.

²⁵ 2020 [Advice of the Digital Markets Taskforce](#), paragraph 4.15. See also [Appendix B](#), paragraphs 13-14 and 18; A new pro-competition regime for digital markets ([CP 489](#)), paragraph 51; and the UK’s [2022 note](#) to the OECD on the evolving concept of market power in the digital economy, paragraphs 67-69.

²⁶ The government’s [2022 response to consultation](#) on a new pro-competition regime for digital markets, page 14.

activities – where they share a common purpose or can be carried out together to fulfil a specific purpose.

- 2.17 This too allows the regime to reflect the reality of specific firms' business models, and in particular the interconnected nature of products and services in the 'ecosystems' or 'platforms' that feature in the digital economy. The recommendation of the digital markets taskforce was that the CMA should be able to 'group products or services supplied by a firm into a single activity when these products or services (i) can reasonably be described as having a similar function or (ii) can reasonably be described as fulfilling, in combination, a specific function', giving among other examples the services offered to buyers and sellers by an online marketplace or app store.²⁷ The explanatory notes to the Act give as examples of activities that might appropriately be 'grouped': a social media provider offering a number of services under different brands with the common function of allowing advertisers and publishers to interact and communicate with each other; and products and services that are part of the same supply chain, such as services selling advertisements and the provision of an advertising platform.²⁸
- 2.18 A digital activity must be 'linked to the UK', consistent with the government's decision to require the CMA 'to establish a UK nexus, ensuring a focus on competition in the UK'.²⁹ Such a link exists where the digital activity has a significant number of UK users; the firm carries on business in the UK in relation to the digital activity; or the way in which the firm carries on the digital activity is likely to have an immediate, substantial and foreseeable effect on trade in the UK.

The SMS conditions

- 2.19 In addition to digital activities, the Act introduces another bespoke concept for the digital markets competition regime: 'substantial and entrenched market power'.³⁰ This legal concept is tailored to the nature of the regime: to assess whether a firm has substantial and entrenched market power in a digital activity, the Act requires the CMA to carry out a forward-looking assessment of a period of at least five years, taking into account expected and foreseeable developments that may affect the firm's conduct in carrying out the activity.

²⁷ The 2020 advice of the digital markets taskforce, [Appendix B](#), paragraphs 16-17.

²⁸ Explanatory notes to the Act, paragraph 103. Further examples of when it may be appropriate to 'group' digital activities can be found in CMA194, paragraphs 2.14-2.15.

²⁹ The government's [2022 response to consultation](#) on a new pro-competition regime for digital markets, paragraph 44.

³⁰ Although the Furman report proposed that 'The 'significant market power' test in telecoms regulation provides a good starting point' for the assessment of market power in the digital economy (the [2019 'Furman' Report](#), paragraph 2.117), Parliament chose not to import concepts from other legal regimes. Cf, for example, the Communications Act 2003, which provides that 'significant market power' is to be construed in the same way as the concept of dominance under the Competition Act 1998: section 78.

- 2.20 The explanatory notes to the Act state that ‘The underlying policy intent is that the CMA should be satisfied that the undertaking’s power and influence in the digital activity is neither small nor transient, based on their consideration of competitive conditions. However, the CMA is not required to demonstrate that the undertaking’s market power will definitely endure for a minimum period of five years. The intent is also that the CMA should not be prevented from considering past and present market conditions as part of this forward-looking assessment’.³¹
- 2.21 To establish that a firm has a position of strategic significance in respect of the digital activity, the CMA must show that the firm meets at least one of the criteria set out in the Act:
- (a) a position of significant size or scale in respect of the digital activity;
 - (b) a significant number of other firms use its digital activity in carrying on their business;
 - (c) the firm’s position in respect of the digital activity would allow it to extend its market power to a range of other activities; and
 - (d) the firm’s position in respect of the digital activity allows it to determine or substantially influence the ways in which other firms conduct themselves.
- 2.22 To ensure clarity as to what qualifies as a position of strategic significance, this is an exhaustive list of factors.³² It is complementary to the substantial and entrenched market power condition, since the government recognised that ‘Digital firms may have significant size or scale or have many business and consumer users, but that does not in itself indicate a competition problem’.³³
- 2.23 Only where the CMA can demonstrate that all the conditions in the Act are met is it able to designate a firm as having SMS in respect of the relevant digital activity.

The process

- 2.24 Before designating a firm with SMS, the CMA must carry out an ‘SMS investigation’ to determine whether the legal tests are met.
- 2.25 This is a process of ongoing engagement with the relevant firm, stakeholders and the wider public, as part of the CMA’s ‘participative approach’ to operating the regime.³⁴

³¹ Explanatory notes to the Act, paragraph 109.

³² The government’s [2022 response to consultation](#) on a new pro-competition regime for digital markets, pages 16-17.

³³ Government consultation document, A new pro-competition regime for digital markets ([CP 489](#)), paragraph 62.

³⁴ See [Overview of the CMA’s provisional approach to implement the new Digital Markets competition regime](#).

- 2.26 The CMA publishes an ‘invitation to comment’ encouraging those interested to provide their views. We gather evidence through formal powers, through meetings and calls, and potentially through research commissioned from third parties; and provide the relevant firm with multiple opportunities to address decision makers directly. If we propose to designate that firm, we carry out a public consultation on our proposal.
- 2.27 The CMA must reach a decision within nine months. If, having considered all the evidence and submissions received, we decide to designate the firm, we must publish our decision and the reasons for it.
- 2.28 A designation lasts, in principle, for five years. But it can be reviewed at any point and can be revoked, for example if changes in competitive conditions mean the firm no longer meets the SMS tests.
- 2.29 In designing the digital markets competition regime, the government recognised that ‘The size and presence of ‘big’ digital firms is not inherently bad’.³⁵ There are no rules that apply automatically to designated firms, and the Act does not compel the CMA to impose any particular rules.
- 2.30 Instead, the Act allows the CMA to introduce targeted measures in relation to the digital activity, where such measures are proportionate for the purposes of specific statutory objectives – that users or potential users of the relevant digital activity:
- (a) Are treated fairly and subject to reasonable terms (fair dealing);
 - (b) Are able to choose freely and easily between firms providing services or digital content (open choices); or
 - (c) Have the information they need to understand the terms on which the activity is provided to them, and make properly informed decisions about their interaction with the firm (trust and transparency).
- 2.31 Before introducing such measures, the CMA must carry out further public consultation.

Our investigation into Google’s general search services

- 2.32 On 14 January 2025 we began our first SMS investigation under the digital markets competition regime, into whether to designate Google as having SMS in general search services.

³⁵ The government’s [2022 response to consultation](#) on a new pro-competition regime for digital markets, page 7.

Market background and previous CMA work

- 2.33 Google launched in 1998 and by 2000 had developed the world's largest search index. In the same year, one of its main rivals, Yahoo, agreed to make Google its default search results provider. When, in 2010, Ask.com refocused away from developing its own search technology, Google and Microsoft were the only two remaining large web-crawling English-language search engines.
- 2.34 Within its wider ecosystem, Google's main general search product – a service that can, in principle, respond to any type of search query – is Google Search. This 'crawls' the world wide web to create an index of websites and return a set of ranked, curated results from this 'web index' in response to queries. It also draws on other sources of information.
- 2.35 The only other search provider with a large-scale English-language web index is Microsoft's Bing. Brave also has its own index on a smaller scale. Other general search providers offering a similar service to users include DuckDuckGo and Yahoo, utilising 'syndicated' search results. Recently, artificial intelligence (AI)-based services such as ChatGPT and Google's own Gemini AI assistant have emerged which can, among other things, also answer a wide range of queries.
- 2.36 Google monetises its general search service through advertising. Advertisers pay for an advertisement to appear alongside the results of a search, through auctions for placements based on specific search terms (hence 'search advertising').
- 2.37 The CMA has previously investigated Google's position in search, notably in its 2020 market study into online platforms and digital advertising (**DAMS**).³⁶ We found then that in each year between 2009 and 2019 Google generated more than 90% of UK search traffic and more than 90% of UK search advertising revenues.
- 2.38 We identified in the market study a number of market features preventing rival search engines competing effectively with Google:
- (a) economies of scale and scope – the infrastructure to search the web (a web index and crawlers) represents a major cost and is subject to significant economies of scale;³⁷
 - (b) network effects – users of search engines benefit from increased quality as the search engine acquires a greater number of users. This effect is driven by the importance of data;³⁸
 - (c) importance of data – the data on what queries users make and subsequently click on (click-and-query data) allow search engines to improve the quality

³⁶ [Online platforms and digital advertising market study](#), July 2020 (DAMS).

³⁷ [Online platforms and digital advertising market study](#), July 2020 (DAMS), paragraphs 3.53-3.63 and 3.87-3.91.

³⁸ [Online platforms and digital advertising market study](#), July 2020 (DAMS), paragraphs 3.59 and 3.64.

and relevance of search results. The greater scale of queries Google sees compared to its rivals means it is able to deliver more relevant search results, in particular in relation to uncommon and new queries;³⁹

- (d) role of defaults – Google has an extensive number of default positions on different kinds of devices and web browsers, in particular on almost all mobile devices in the UK. This limits rival search engines’ ability to reach users, build scale and grow into stronger competitors over time;⁴⁰ and
- (e) Google’s wider ecosystem of products and services means it controls a number of routes through which general search services are accessed (for example browsers and operating systems), and in which it can therefore give its own general search service preferential treatment. Through this wider ecosystem of products and services, Google collects extensive data that gives Google a substantial competitive advantage over rivals in providing search advertising services.⁴¹

2.39 In this SMS investigation we have built on our existing understanding from DAMS. However, there have been important changes in the market since 2020, notably with the development in new generative AI tools, and we have based our findings in this Decision on new evidence and analysis.

International context

2.40 Several competition authorities globally have investigated or taken action in relation to Google’s general search services in recent years. Although our SMS investigation is focused on Google’s activities in the UK, Google’s general search services operate globally, and we have sought to learn from international findings in conducting our own investigation. These include:

- (a) **US DoJ case in relation to Google Search** – in proceedings brought by the US DoJ on behalf of federal and state governments, on 5 August 2024 the US District Court for the District of Columbia found that Google had acted illegally to maintain its monopoly position in the markets for ‘general search services’ and ‘general search text advertising’ in the US.⁴² The Court’s remedies opinion of 2 September 2025⁴³ set out (subject to directing the parties to submit proposals for a final judgment implementing its opinion) a range of remedies concerning Google’s exclusive agreements, search index and user data-sharing, search and search advertising syndication and ad

³⁹ [Online platforms and digital advertising market study](#), July 2020 (DAMS), paragraphs 3.64-3.91.

⁴⁰ [Online platforms and digital advertising market study](#), July 2020 (DAMS), paragraphs 3.93-3.128.

⁴¹ [Online platforms and digital advertising market study](#), July 2020 (DAMS), paragraphs 3.129-3.144.

⁴² *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024. The Court defined these as relevant markets with a national geographic scope.

⁴³ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 2 September 2025.

auction transparency.⁴⁴ We refer to these proceedings as the **US DoJ Search Litigation**.

- (b) **The EU's Digital Markets Act (DMA)** – Google is a designated gatekeeper under the DMA for both its online search engine Google Search and its online advertising (including search advertising) services.⁴⁵ As a result Google is subject to a range of obligations in relation to its search activities.
- (c) **Japan Fair Trade Commission (JFTC) and Japan's Mobile Software Competition Act** – Google has been designated by the JFTC as a specified software operator under Japan's Mobile Software Competition Act⁴⁶ and will therefore be subject to certain prohibitions and obligations in relation to the provision of smartphone software.⁴⁷ Separately, the JFTC recently issued a cease-and-desist order to Google under Japan's Antimonopoly Act in relation to its agreements with Android device manufacturers, which orders that Google stop requiring pre-installation and prominent placement of its search products with those partners.⁴⁸
- (d) **Australian Competition & Consumer Commission (ACCC) Digital Platform Services Inquiry interim report** – In December 2024 the ACCC published a report revisiting competition and consumer issues arising in the supply of general search services in Australia.⁴⁹ It highlighted the continued need for regulatory reform to address digital platform-related competition and consumer harms.

The process we have followed

2.41 The key stages in our process are set out below:

⁴⁴ The parties submitted their proposed final judgments on 17 September 2025. The Court has yet to rule on the final form of the remedies.

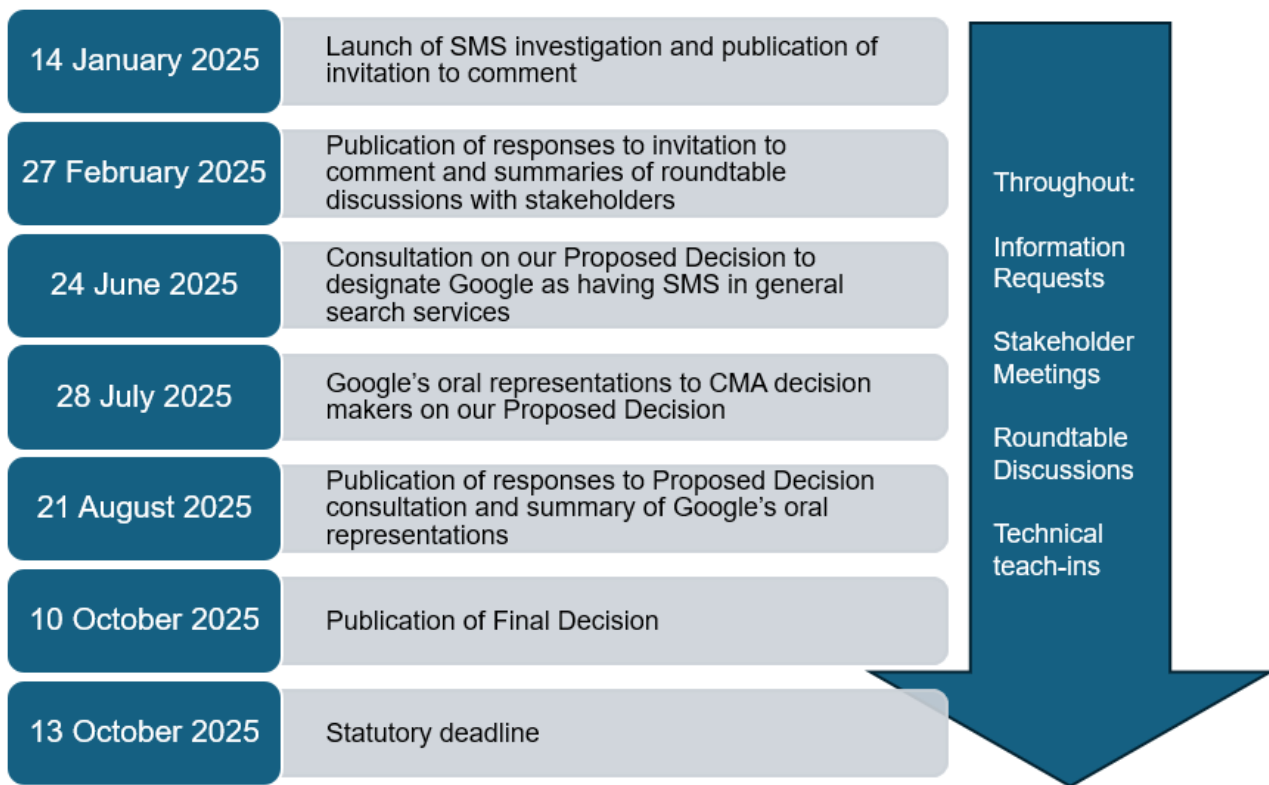
⁴⁵ Commission decision of 5.9.2023 designating Alphabet as a gatekeeper pursuant to Article 3 of Regulation (EU) 2022/1925 of the European Parliament and of the Council on contestable and fair markets in the digital sector.

⁴⁶ Act on Promotion of Competition for Specified Smartphone Software (Act No. 58 of 2024).

⁴⁷ [Designation of Specified Software Operators under the Act on Promotion of Competition for Specified Smartphone Software | Japan Fair Trade Commission](#).

⁴⁸ JFTC press release, 'JFTC Issues a Cease and Desist Order to Google LLC': <https://www.jftc.go.jp/en/pressreleases/yearly-2025/April/250415.html>.

⁴⁹ [Digital Platform Services Inquiry interim report - September 2024 | ACCC](#). The report revisits and reconsiders general search after it was previously considered in the [ACCC's third Digital Platform Services Inquiry interim report in October 2021](#).



2.42 During our investigation, we gathered a wide range of evidence from Google, stakeholders across the digital economy, and the public:

- (a) At the outset of the investigation, we published an invitation to comment (the **ITC**) inviting views on the scope and main avenues of the investigation. We received 50 ITC responses from third parties and published non-confidential responses on the case page on 27 February 2025.⁵⁰
- (b) Engagement with Google: Google commented on our emerging thinking in its response to the ITC, in a number of submissions, and during in-person meetings with CMA decision makers and several technical 'teach-ins' with the case team. We sent formal requests for information to Google, in response to which we obtained qualitative evidence, around 500 internal documents, and quantitative data.
- (c) Evidence from other market participants: we received information from more than 80 market participants, including both qualitative and quantitative evidence. We held over 80 bilateral calls and meetings, and two series of roundtable events for groups of stakeholders, one series prior to the Proposed Decision (publishers, advertisers and specialist search services) and one series following (publishers, businesses, and those with an interest

⁵⁰ [SMS investigation into Google's general search .and search advertising services - GOV.UK.](#)

in choice architecture) to explore the issues and hear their views. Summaries of the roundtable discussions were published on our case page.

- (d) Consumer market research and survey: we engaged an independent market research company (Thinks Insight and Strategy) to conduct qualitative research to inform the investigation, focused on understanding how consumers are using generative AI assistants for web search activities (the **consumer research**). A consumer survey was also undertaken by Accent, an independent market research agency, to understand the prevalence of AI assistant usage among consumers (the **consumer survey**).⁵¹ The findings from these pieces of research are published on the case page.
- (e) Views from experts and other regulators: we met with expert advisers and liaised with relevant regulators including Ofcom and the ICO in the UK.
- (f) We published our Proposed Decision to designate Google as having SMS on 24 June 2025 and consulted on that proposal for four weeks. We received 34 written responses from a range of stakeholders including Google and other general search providers, specialised search providers, news publishers, advertisers, consumer and advocacy organisations and academics. Responses were published on 21 August 2025.⁵²
- (g) Google also had the opportunity to make oral representations to CMA decision makers on our Proposed Decision. A summary of those representations was published on 21 August 2025.⁵³
- (h) In addition, we held three roundtables with different stakeholder groups, primarily focused on our interventions Roadmap but which also considered the Proposed Decision.⁵⁴

2.43 All responses and representations have been considered in coming to our Decision. In the relevant sections below we set out the substantive representations we received and how our conclusions take account of them.

⁵¹ The Accent consumer survey of smartphone owners was commissioned as part of the SMS investigations into Apple and Google's mobile ecosystems. A question module on searching for information online was added to the survey for the purposes of this investigation. Findings specific to this investigation are published on the case page.

⁵² Published non-confidential responses can be found [here](#).

⁵³ A summary of Google's oral representations can be found [here](#).

⁵⁴ Summaries of these roundtables can be found [here](#).

3. THE UNDERTAKING AND TURNOVER CONDITION

The Google undertaking

- 3.1 The Act provides that the CMA may designate an ‘undertaking’ as having SMS in respect of a digital activity carried out by the undertaking (where the conditions in the Act are met).⁵⁵
- 3.2 ‘Undertaking’ has the same meaning as it has for the purposes of Part 1 of the Competition Act 1998.⁵⁶
- 3.3 The concept of ‘undertaking’ covers any entity engaged in an economic activity, regardless of its legal status and the way in which it is financed. It is ‘an economic unit even if in law that economic unit consists of several persons, natural or legal’.⁵⁷ An undertaking therefore does not correspond to the commonly understood notions of a legal entity or corporate group, for example under English commercial or tax law.⁵⁸
- 3.4 Multiple persons (such as a parent company and its subsidiaries) will usually be treated as a single undertaking if they operate as a single economic entity. This will be the case where one exercises ‘decisive influence’ over another – for example, a parent company which decides the commercial policy of its subsidiaries.⁵⁹
- 3.5 The Act requires us to describe the designated undertaking.⁶⁰ Our guidance explains that where an undertaking comprises multiple companies, we will usually seek to identify the parent company and the main subsidiaries responsible for carrying on the digital activity, and will provide a non-exhaustive list of the legal entities which form part of the undertaking to which our decision applies.⁶¹
- 3.6 The Google undertaking we are designating as having SMS in respect of general search services includes Alphabet Inc., Google LLC, Google Ireland Limited, Google UK Limited and Google Commerce Limited – respectively the parent company and the main subsidiaries responsible for carrying on general search services, which form a single economic unit engaged in economic activity and therefore an undertaking within the meaning of the Act:

⁵⁵ Section 2(1) of the Act.

⁵⁶ Section 118(1) of the Act.

⁵⁷ C-97/08 *Akzo v Commission*, paragraphs 54-55.

⁵⁸ *Sepia Logistics Limited v Office of Fair Trading* [2007] CAT 13, paragraph 70.

⁵⁹ CMA194, footnote 2. Where a parent company holds all or virtually all of a subsidiary’s share capital or all of its voting rights, there is a rebuttable presumption that it exercises decisive influence over, and therefore forms a single undertaking with, that subsidiary. See, for example, C-97/08 *Akzo v Commission*, paragraph 60; C-595/18 P *Goldman Sachs v Commission*, paragraphs 35-36.

⁶⁰ Section 15(3)(a) of the Act.

⁶¹ CMA194, paragraph 2.104, footnote 78 and paragraph 2.90.

- (a) Google LLC⁶² provides Google Search to users based in the UK.⁶³
- (b) Google Ireland Limited⁶⁴ is the service provider for Google's Search Ads 360 (SA360) product and operates Google Ads for business customers.⁶⁵
- (c) Google UK Limited⁶⁶ is the employer of Google's personnel in the UK,⁶⁷ and provides intra-group services to other Google entities.⁶⁸
- (d) Google Commerce Limited⁶⁹ is the service provider for Google Ads where the customer has chosen 'eligible non-business use' as the purpose of use for its account.⁷⁰
- (e) Each of Google LLC, Google Ireland Limited, Google UK Limited and Google Commerce Ltd is ultimately wholly owned by Alphabet Inc.⁷¹

The turnover condition

- 3.7 The CMA may not designate an undertaking as having SMS in respect of a digital activity unless the 'turnover condition' is met in relation to the undertaking.⁷²
- 3.8 The turnover condition is met in relation to an undertaking if the CMA estimates that:⁷³

⁶² A private limited company incorporated in Delaware, United States of America under registered number 3582691, with its registered office at 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States of America.

⁶³ Google's consolidated response to the CMA's RFI.

⁶⁴ A private limited company incorporated in the Republic of Ireland under registered number 368047, with its registered office at Gordon House, 4 Barrow Street, Dublin, D04 E5W5, Ireland.

⁶⁵ Google's consolidated response to the CMA's RFI.

⁶⁶ A private limited company incorporated in the United Kingdom under registered number 03977902, with its registered office at 1 St. Giles High Street, London, WC2H 8AG, United Kingdom.

⁶⁷ Google's consolidated response to the CMA's RFI.

⁶⁸ Google UK Limited, Directors' Report and Financial Statements, Financial Year ended 31 December 2023, page 19 [application-pdf](#). Google described Google UK Limited in similar terms in its consolidated response to the CMA's RFI.

⁶⁹ A limited liability company incorporated in the Republic of Ireland under registered number 512080, with its registered office at Gordon House, 4 Barrow Street, Dublin, D04 E5W5, Ireland.

⁷⁰ 'Eligible non-business use' means that a customer uses their search advertising account in connection with a political, non-profit, or charitable purpose related to their trade, business, craft or profession. Google's consolidated response to the CMA's RFI. Google clarified in its consolidated response to the CMA's RFI.

⁷¹ A public listed company incorporated in Delaware, United States of America under registered number 5786925, with its registered office at 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States of America. The corporate structure charts Google submitted (Google's consolidated response to the CMA's RFI; Google's consolidated response to the CMA's RFI) indicate that each of Google LLC, Google Ireland Limited, Google UK Limited and Google Commerce Ltd is wholly owned by XXVI Holdings Inc., which is in turn 'Controlled by Alphabet Inc.' Although the structure charts do not indicate the proportion of voting rights or shares held by Alphabet Inc, a US regulatory filing from January 2025 states that Alphabet Inc. holds '100% equity interest and more than 99% voting interest in XXVI Holdings [Inc]' (Streamlined Submarine Cable Landing License Applications, 10 January 2025, Federal Communications Commission, bottom of page 2, [SCL00509S.pdf](#)). The presumption that Alphabet Inc. exercises decisive influence over XXVI Holdings Inc. (and therefore indirectly over each of Google LLC, Google Ireland Limited, Google UK Limited and Google Commerce Limited) therefore applies. Google has not disputed this.

⁷² Sections 2(3) and 7(1) of the Act.

⁷³ Section 7(2) of the Act.

- (a) the total value of the global turnover of an undertaking or, where the undertaking is part of a group,⁷⁴ the global turnover of that group in the relevant period exceeds £25 billion (the **global turnover threshold**); or
- (b) the total value of the UK turnover⁷⁵ of an undertaking or, where the undertaking is part of a group, the UK turnover of that group in the relevant period exceeds £1 billion (the **UK turnover threshold**).⁷⁶

3.9 The ‘relevant period’, in each case, means:

- (a) the most recent period of 12 months in respect of which the CMA considers that it is able to make an estimate of the total value of the relevant turnover of the undertaking or group; or
- (b) if the CMA estimates that the relevant turnover of the undertaking or group in the period of 12 months prior to the period in (a) above was higher, that earlier period of 12 months.⁷⁷

3.10 Further details on the methodology for estimating turnover are set out in the Digital Markets, Competition and Consumers Act 2024 and Consumer Rights Act 2015 (Turnover and Control) Regulations 2024 (the **Turnover Regulations**), Schedule 1.

3.11 Our guidance explains that the CMA’s starting point for assessing relevant turnover will usually be the undertaking and/or group’s latest published accounts.⁷⁸ Further, the CMA expects that the most recent period of 12 months in respect of which it is able to make an estimate of the total value of the relevant turnover of the undertaking or group will in most instances be the 12-month period covered by those accounts.⁷⁹

3.12 For the reasons set out below, the global turnover threshold and the UK turnover threshold (either of which would suffice) are both exceeded – and therefore the turnover condition is met in relation to the Google undertaking.⁸⁰

⁷⁴ An undertaking is part of a group if one or more bodies corporate which are comprised in the undertaking are members of the same group as one or more other bodies corporate. Two bodies corporate are members of the same group if (a) one is the subsidiary of the other, or (b) both are subsidiaries of the same body corporate (section 117 of the Act).

⁷⁵ Turnover relating to UK users or UK customers: section 8(3) of the Act. ‘UK user’ and ‘UK customer’ are defined in section 118(1) of the Act as meaning any user or, as the case may be, customer who it is reasonable to assume (a) in the case of an individual, is normally in the UK; and (b) in any other case, is established in the UK.

⁷⁶ In each case, turnover arising in connection with any activities is taken into account: section 8(2) and (3) of the Act.

⁷⁷ Section 7(6) of the Act.

⁷⁸ Where the CMA is assessing turnover for the purposes of the UK turnover threshold, this will include considering any geographic breakdown contained in the published accounts. See paragraph 2.37 of CMA194.

⁷⁹ See paragraph 2.39 of CMA194.

⁸⁰ Pursuant to section 7(2) of the Act, where the undertaking is part of a group, the turnover of the group should be considered. We have therefore considered the turnover of the Google group as a whole (with Alphabet Inc. as the ultimate parent company) rather than the turnover only attributable to the main subsidiaries responsible for carrying on the relevant digital activity.

- (a) Alphabet Inc.'s most recent published accounts report revenues of \$350 billion (£273.8 billion⁸¹) for the financial year ending 31 December 2024.^{82, 83}
- (b) Alphabet Inc.'s published accounts also include a geographic breakdown of global revenues on a regional basis, based on the addresses of its customers. The UK is part of the EMEA (Europe, Middle East and Africa) revenue reporting region, which reported revenues of \$102.1 billion (£79.9 billion⁸⁴) for the financial year ending 31 December 2024.⁸⁵
- (c) While Alphabet Inc.'s published accounts do not include UK-specific revenue figures, Google estimates its UK revenues, based on the addresses of its customers, to be approximately \$[£] billion (£[10-20] billion).⁸⁶ Google has also confirmed that its UK turnover would exceed the UK turnover threshold if assessed under the Turnover Regulations.^{87, 88}

⁸¹ Using the UK Office for National Statistics' average exchange rate for USD vs GBP of 1.2783 for the period from 1 January 2024 to 31 December 2024.

⁸² Source: [Form 10-K for Alphabet INC filed 02/05/2025](#). Given the scale by which Google's reported turnover exceeds the global turnover threshold, we have not conducted a more detailed assessment of its global turnover based on the methodology specified in the Turnover Regulations.

⁸³ The turnover figure referenced for the global turnover threshold has been corrected subsequent to the publication of the Proposed Decision. The global turnover figure of \$304.9 billion referenced in paragraph 3.12 of the Proposed Decision was the reported turnover for the Google Services reporting segment only, not the total Alphabet Group.

⁸⁴ Using the UK Office for National Statistics' average exchange rate for USD vs GBP of 1.2783 for the period from 1 January 2024 to 31 December 2024.

⁸⁵ Source: [Form 10-K for Alphabet INC filed 02/05/2025](#).

⁸⁶ Google's consolidated response to the CMA's RFI.

⁸⁷ Google's consolidated response to the CMA's RFI.

⁸⁸ We recognise there may be differences between the way a company accounts for UK turnover in its financial statements and the UK turnover threshold methodology set out in the Turnover Regulations. However, as Google has confirmed that its UK turnover would exceed the UK turnover threshold if assessed under the Turnover Regulations, we have not conducted a full assessment of turnover relating to UK users or UK customers.

4. THE DIGITAL ACTIVITY

- 4.1 The CMA may designate an undertaking as having SMS in respect of ‘a digital activity carried out by the undertaking’ where the conditions in the Act are met.⁸⁹
- 4.2 For these purposes, ‘digital activities’ are:⁹⁰
- (a) the provision of a service by means of the internet, whether for consideration or otherwise;
 - (b) the provision of one or more pieces of digital content, whether for consideration or otherwise;
 - (c) any other activity carried out for the purposes of an activity within (a) or (b) above.
- 4.3 The Act provides that the CMA may treat (or ‘group’) two or more digital activities that are carried out by a single undertaking as a single digital activity where:⁹¹
- (a) the activities have substantially the same or similar purposes, or
 - (b) the activities can be carried out in combination with each other to fulfil a specific purpose.
- 4.4 The Act requires us to describe the digital activity with respect to which the SMS designation has effect.⁹² The Act refers to this as the ‘relevant digital activity’.⁹³
- 4.5 Our guidance states that we will indicate which of the existing products offered by the firm we consider to be within the scope of the relevant digital activity at the point of making a decision to designate the firm as having SMS.⁹⁴
- 4.6 In identifying a digital activity and considering which of the firm’s products it may comprise, we will typically look at how those products are offered and consumed. For example, we may consider how the firm structures itself and its business model, how businesses and consumers use and access its products, and any interlinkages among them. In practice, this will largely focus on factual information and will not require an assessment of the competitive constraints on the firm or a market definition exercise.⁹⁵

⁸⁹ Section 2(1) of the Act.

⁹⁰ Section 3(1) of the Act.

⁹¹ Section 3(3) of the Act. Explanatory notes to the Act, paragraph 103.

⁹² Section 15(3)(b) of the Act.

⁹³ Section 118(1) of the Act.

⁹⁴ CMA194, paragraph 2.107.

⁹⁵ CMA194, paragraph 2.10.

Summary of our decision on the relevant digital activity

Our description of the relevant digital activity

4.7 We have decided to describe the relevant digital activity as the provision of:

A service that searches the world wide web, and can draw on other sources, to return information on any subject (**general search**);

and

A service that enables advertising to users of general search (**search advertising**) together, **general search services**.

4.8 We find that each of general search and search advertising is a digital activity within the meaning of the Act; and further, that they may be treated as a single digital activity (general search services) as they can be carried out in combination with each other to fulfil the specific purpose of providing a general search and search advertising platform.

The products within the scope of the relevant digital activity

4.9 We find that the following Google products are within the scope of the relevant digital activity:

(a) Google Search:

(i) however it is accessed; and

(ii) all information it returns through its underlying infrastructure, including on its search engine results page (SERP). For example:

(1) generative AI features such as AI Overviews and AI Mode;

(2) other features presented on the SERP such as specialised search units, videos and maps, and the 'Top Stories' carousel;

(3) the 'News' tab; and

(4) Google Discover;

(b) Programmable Search Engine (ProSE) and Web Search Syndication (WSS) when configured to provide general search;

(c) AdSense for Search when used in conjunction with ProSE or WSS to provide advertising to users of general search; and

(d) Google Ads and SA360 when they provide search advertising.

4.10 We have found that the following Google products are outside the scope of the relevant digital activity:

(a) Google's standalone specialised search services;

(b) ProSE and WSS when not configured to provide general search;

(c) Google News;

(d) Gemini AI assistant; and

(e) Google's advertising products when they do not provide search advertising. For example:

(i) Google Ad Manager which provides display advertising;

(ii) Google Ads and SA360 when they provide display advertising; and

(iii) AdSense for Search when not used in conjunction with ProSE or WSS to provide advertising to users of general search.

General search

4.11 When we launched the investigation, we explained that our preliminary description of general search – 'a service that searches the world wide web and returns information' – reflected that Google's service allows users to search the world wide web through any medium and returns results in the form of information of any type (including but not limited to all the information on Google's SERP):⁹⁶

(a) Google's general search 'crawls' the world wide web to create an index of websites and return a set of ranked, curated results from this web index in response to queries.⁹⁷ This is a key distinction between general and specialised search services, which generate results based on data feeds taken directly from providers and specialise in specific topics (such as travel or finance).⁹⁸

(b) Google's general search can be accessed in numerous ways, including through web browsers, webpages, search apps, voice assistants and smart speakers; and through other means such as interaction with images.⁹⁹

⁹⁶ ITC, paragraph 21. [Invitation to comment](#).

⁹⁷ ITC, paragraph 17 [Invitation to comment](#); [Online platforms and digital advertising market study](#), July 2020 (DAMS), paragraphs 2.25, 2.28-2.29 and 3.6.

⁹⁸ ITC, paragraph 17 [Invitation to comment](#); [Online platforms and digital advertising market study](#), July 2020 (DAMS), paragraphs 3.9, 3.45-3.51, 3.129 and Appendix P, paragraphs 6-7 and 17.

⁹⁹ ITC, paragraph 18. [Invitation to comment](#).

- (c) Google's general search returns information in response to a user's query on any topic. For any user query, the information returned may include:¹⁰⁰
 - (i) organic results (based on Google's web index and rankings);
 - (ii) paid results (see 'Search advertising' below); and
 - (iii) 'search features' such as Google's shopping 'carousel', in-set maps and video displays as well as integrated links to Google's specialised search services.¹⁰¹ These search features contain specialised information which is available to users without leaving Google's SERP.

4.12 We invited views from stakeholders on our proposed description and scope of Google's general search in both the ITC and our Proposed Decision:

- (a) Of the 50 third party responses to our ITC, 19 addressed this. Those responses were broadly supportive of our proposed scope and description.¹⁰² In particular, Checkatrade and Skyscanner supported the distinction between specialised and general search services, while agreeing that all results on the SERP should be included within the scope of general search.¹⁰³
- (b) Of the 33 third party responses to our Proposed Decision, 20 addressed our proposed scope and 2 our proposed description.¹⁰⁴ We have carefully considered the points raised and address them where appropriate in the sections that follow.¹⁰⁵

¹⁰⁰ ITC, paragraph 20. [Invitation to comment.](#)

¹⁰¹ [Features - How Google Search Works.](#)

¹⁰² Public Interest News Foundation; Knight Georgetown Institute; Checkatrade; Skyscanner; Which?; Consumer Choice Center; Movement for an Open Web; News Media Association; Platform Leaders; Computer and Communications Industry Association; Raptive; European Publishers Council; [redacted]; DMG Media; Professional Publishers Association; Fruugo; Open Markets Institute; Foxglove and [redacted]. <https://www.gov.uk/government/consultations/sms-investigation-into-googles-general-search-and-search-advertising-services>.

¹⁰³ Checkatrade's response dated 31 January 2025 to the invitation to comment dated 14 January 2025, page 3; Skyscanner's response dated 3 February 2025 to invitation to comment dated 14 January 2025, pages 2 and 3.

¹⁰⁴ See responses to our Proposed Decision: Anya Schiffrin; Center for Data Innovation; DMG Media; European Publishers Council; Fruugo.com Ltd; Guardian Media Group; Independent Media Association; Kelkoo Group; Knight-Georgetown Institute; Movement for an Open Web; News Media Association; Paul Heidhues, Gene Kimmelman, Giorgio Monti, Monika Schnitzer, Fiona Scott Morton; Platform Leaders; Skyscanner; Trainline; Which?; [redacted] [Anonymous]; [redacted]; [redacted]; [redacted]. [Proposed decision report: SMS investigation into Google's general search and search advertising services - GOV.UK.](#)

¹⁰⁵ The majority of responses to our Proposed Decision focused on the list of products within scope of the designation. Most approved of the inclusion of the SERP, AI Overviews and AI Mode within scope (Anya Schiffrin; DMG Media; European Publishers Council; Guardian Media Group; Independent Media Association; Knight-Georgetown Institute; News Media Association; Platform Leaders; Trainline; [redacted] [Anonymous]; [redacted]). Some submitted that the Gemini AI assistant should be within scope (DMG Media; European Publishers Council; Guardian Media Group; Independent Media Association; Knight-Georgetown Institute; Movement for an Open Web; News Media Association; Paul Heidhues, Gene Kimmelman, Giorgio Monti, Monika Schnitzer, and Fiona Scott Morton; [redacted]); while others agreed that it should be excluded (Center for Data Innovation, Which?, Platform Leaders, [redacted]). Some publishers submitted that Google News should in scope (DMG Media; European Publishers Council; Guardian Media Group; News Media Association; [redacted]). Skyscanner and [redacted] [Anonymous] addressed our proposed description. [Proposed decision report: SMS investigation into Google's general search and search advertising services - GOV.UK.](#)

- 4.13 Google submitted that our description should reflect the fact that its general search draws on multiple data sources in addition to the world wide web.¹⁰⁶
- 4.14 Google explained that ‘Google Search’s infrastructure’ – the ‘fundamental building blocks of Google Search’ – includes:¹⁰⁷
- (a) Collecting information – not only from crawling websites, but also from licences, data feeds provided by websites (for example from news publishers), user-submitted information (such as reviews), and Google’s own observations of the physical world (for example in relation to local places or businesses).
 - (b) Indexing the collected information in databases, from which it can be retrieved at the time of a query.
 - (c) Analysing queries and user intent. This incorporates AI systems to decipher natural language and ‘understand’ what a user ‘means’ by a query so as to produce a meaningful response.
 - (d) Generative AI systems contributing to AI Overviews (see the section below).
 - (e) Matching and ranking results to respond to queries. This entails use of AI and machine learning systems to score the relative utility of results, based on (among other things) their relevance and quality.
 - (f) Organising and displaying results.¹⁰⁸
- 4.15 Google did not explain the relative importance of the different information sources in (a) above, stating that it was hard to quantify their relative magnitude, with each source bringing different value to different query types.¹⁰⁹ Google did, however, explain that its web index contains around [20-30] billion websites and hundreds of billions of web pages.¹¹⁰

¹⁰⁶ Google’s consolidated response to the CMA’s RFI.

¹⁰⁷ Google’s consolidated response to the CMA’s RFI. See also the materials Google presented to the case team for the ‘Search infrastructure technical teach-in’.

¹⁰⁸ Google also submitted that its general search infrastructure includes ‘Search ads systems and associated technology that allow Google to surface search ads’; and ‘Testing and development tools that allow Google to address technical issues (debugging) and perform analyses to maintain and improve its systems’. Google’s consolidated response to the CMA’s RFI. For the avoidance of doubt, we consider that these also form part of Google’s general search. Search ads systems and associated technology would therefore form part of both Google’s general search and search advertising, an interlinkage reflected in our proposal to group these digital activities: see below.

¹⁰⁹ Note of search infrastructure teach-in.

¹¹⁰ Google’s consolidated response to the CMA’s RFI.

- 4.16 Google agreed that all information incorporated in its SERP is part of its general search;¹¹¹ and submitted that '[t]he type of data source that Google Search uses is not relevant to whether a search result is part of Google Search or not'.¹¹²
- 4.17 Consistent with Google's submission that all the 'building blocks' of its general search serve the 'overarching purpose' of answering user queries in the best way it can, in our Proposed Decision we adjusted our description of general search from the description provided in the Investigation Notice to recognise that these other sources and processes form part of the infrastructure that produces the information returned by Google's general search.¹¹³ We also adjusted our description to reflect that (unlike specialised search services), Google's general search can provide information on any subject (as shown in bold below):

'A service that searches the world wide web, **and can draw on other sources**, to return information **on any subject**'

- 4.18 In response to our Proposed Decision, Google substantively agreed with our proposed description of general search but submitted that it should be amended to apply only to 'a service **whose primary purpose is to search** the world wide web'.¹¹⁴ Google submitted that this amendment was consistent with CMA's DMCR guidance and required in order to clearly delineate search and non-search products; provide certainty to its business and third parties about which products are in scope of interventions; and prevent interventions from disproportionately and inadvertently extending beyond their intended scope.¹¹⁵
- 4.19 We do not consider that this amendment is necessary or appropriate. Our Guidance explains that our description of the relevant digital activity will set out its overall purpose, and we have done so. We have clearly set out the Google products that we consider to be within the scope of the relevant digital activity. We will take appropriate steps to clarify the scope of any interventions we impose.¹¹⁶

¹¹¹ Google's consolidated response to the CMA's RFI: '[t]he results that Google Search returns in response to a query on its search results page (SERP) are part of Google Search, irrespective of the technology, data source, and display format used ... all the search results that Google Search shows in response to queries are part of Google Search, irrespective of the display format'.

¹¹² Google's consolidated response to the CMA's RFI.

¹¹³ In response to our Proposed Decision, two stakeholders expressed concern that the addition of 'and can draw on other sources' risked blurring the lines between general search and specialised search. See Skyscanner's response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, page 2; See [X] [Anonymous] response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, page 1. [Proposed decision report: SMS investigation into Google's general search and search advertising services - GOV.UK](#) Having considered this representation, we remain of the view that it is important to recognise the range of inputs that contribute to Google's general search, and that the distinction with specialised search (expressed in 'searches the world wide web' and 'on any subject') is sufficiently clear.

¹¹⁴ Google's written response dated 22 July 2025 to the consultation on Proposed Decision Report dated 24 June 2025, paragraph 6. [Google.pdf](#).

¹¹⁵ Google's written response dated 22 July 2025 to the consultation on Proposed Decision Report dated 24 June 2025, paragraph 6. [Google.pdf](#) Email from Google to the CMA.

¹¹⁶ As explained below in relation to the Gemini AI assistant and Google News, the scope of interventions may in any event legitimately extend beyond the scope of the relevant digital activity.

- 4.20 We consider that it is unnecessary to attempt to list exhaustively all the components of Google's general search infrastructure as it currently exists. The underlying infrastructure would include web crawling, indexing and ranking – but also the other 'building blocks' referred to above and any other processes and data sources that contribute to Google's provision of general search, both now and in the future.
- 4.21 All information returned through the use of Google's general search infrastructure, in whatever medium (whether on Google's SERP or otherwise), forms part of its general search.¹¹⁷
- 4.22 In our Proposed Decision, we indicated that this would include (but not be limited to):
- (a) Organic and paid-for general search results;
 - (b) Search features such as links to specialised search services, videos and maps;
 - (c) Google's provision of 'syndicated' general search results to third parties;
 - (d) Google Discover (a Google news product); and
 - (e) Google Search's AI Overviews and AI Mode.¹¹⁸
- 4.23 We provisionally found that Google's Gemini AI assistant is not within scope of the relevant digital activity.
- 4.24 In the following sections, we set out the representations we received on scope in response to the Proposed Decision, and our findings.
- 4.25 We received no representations against the inclusion of organic and paid-for search results, and search features such as links to specialised search services, videos and maps within the scope of the designation.¹¹⁹ The following sections therefore cover:

¹¹⁷ Proposed Decision, paragraph 4.32. Google did not submit any representations on this point in response to the Proposed Decision.

¹¹⁸ Google describes 'AI Mode' in Search as 'combining the advanced capabilities of Gemini 2.0 with Google's best-in-class information systems.' Google states that AI Mode is rooted within its core quality and ranking systems but Google is testing the model's reasoning capabilities to improve factuality. Google will aim to show an AI-powered response as frequently as possible, but in cases where it does not have high confidence in the AI response's helpfulness and quality, the response will be a set of web search results. Google Announcement of 5 March 2025 'Expanding AI Overviews and introducing AI Mode'. [Expanding AI Overviews and introducing AI Mode](#). Google rolled out AI Mode in the US on 20 May 2025. [AI Mode in Google Search: Updates from Google I/O 2025](#) Google launched AI Mode in the UK in July 2025.

¹¹⁹ As explained above, Google agreed that all information incorporated in its SERP is part of its general search. Google's consolidated response to the CMA's RFI. In response to the Proposed Decision, Google confirmed that general search 'encompasses Google Search, including generative AI features like AI Overviews and AI Mode on the Search Engine Results Page (SERP)'. Google's written response dated 22 July 2025 to the consultation on Proposed Decision

- (a) Google's organic search syndication products;
- (b) Google's news products; and
- (c) The relationship between AI and general search (AI Overviews, AI Mode and the Gemini AI assistant).

Google's organic search syndication products

- 4.26 Organic search syndication refers to arrangements that allow third parties to obtain organic (unpaid) search results in response to queries, for example a publisher that wishes to display search results in response to queries entered on its own website.
- 4.27 Google currently offers two organic search syndication products:
- (a) Programmable Search Engine (ProSE) is Google's 'self-service organic search syndication product', which 'enables publishers to include a customisable search engine on their website to help their users find the information they are looking for'.¹²⁰ Once publishers have selected which sites or pages they want the tool to search, and customised other elements of how search results will be presented and ranked,¹²¹ ProSE gives publishers code which they can paste onto their own website to create an embedded search box. Alternatively, publishers can choose to use APIs to receive search results.¹²² Publishers also choose whether to enable image search and SafeSearch functionality.¹²³
 - (b) Web Search Syndication (WSS) is Google's 'organic search syndication product for directly managed partners', which 'is targeted at a narrower set of partners who [redacted]'.¹²⁴ It is essentially the directly-negotiated counterpart to

Report dated 24 June 2025, paragraph 6. [Google.pdf](#) Respondents to our Proposed Decision agreed: see Trainline's response dated 1 August 2025 to consultation on Proposed Decision Report dated 24 June 2025, page 2; Skyscanner's response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, page 2; [redacted] [Anonymous] response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, page 1-2. [Proposed decision report: SMS investigation into Google's general search and search advertising services - GOV.UK](#) (although Skyscanner and [redacted] [Anonymous] submitted that whilst links to Google's specialised search services on the SERP should be within the scope of any designation, they are different services to Google's general search services). We consider that excluding Google's standalone specialised search services (when not integrated within the SERP) from scope adequately draws the line between these services.

¹²⁰ Google's response to the CMA's RFI.

¹²¹ In addition to specifying sites or pages, a publisher can also customise their results by reference to (i) topics (eg movies); (ii) country or regions; (iii) refinement labels (eg letting end users search for recipes involving certain dietary needs); (iv) autocomplete (ie showing useful queries while the end user is typing); and (v) tuning of search results by reference to keywords (see Google's response to the CMA's RFI).

¹²² Google's response to the CMA's RFI.

¹²³ Google's response to the CMA's RFI.

¹²⁴ Google's response to the CMA's RFI.

ProSE, offering similar functionality but with greater scope for customisation.¹²⁵ WSS is implemented using an API.¹²⁶

- 4.28 In our Proposed Decision, we indicated our provisional view that Google's provision of 'syndicated' general search results to third parties would form part of Google's general search.¹²⁷
- 4.29 No third parties commented on our proposed approach in response to the Proposed Decision.
- 4.30 However, Google submitted that its organic search syndication products were 'fundamentally different from general search services' from both a supply side and demand side perspective and should not be in scope of the relevant digital activity. In particular, Google submitted in summary that:
- (a) on the supply side: the products are offered to publishers, not end users and are branded, accessed and sold separately from Google Search; the products themselves are users of the general search infrastructure, rather than being part of a general search digital activity, since they use some Google Search technology as an 'input' when delivering 'downstream' services; and the products can be used without monetisation via Google's advertising syndication products; and
 - (b) on the demand side: the users are publishers, a different customer segment to end users of general search; the vast majority of publishers who use these products do not use them to provide general search to end users; and Google is not the market leader (and does not have substantial and entrenched market power) in organic search syndication.¹²⁸ Google has also separately told us that there are [X] (noting that [X], a WSS publisher, is based in [X]).¹²⁹
- 4.31 We do not consider that Google's submissions in themselves justify excluding its organic search syndication products from the scope of the relevant digital activity. In particular:

¹²⁵ Google's response to the CMA's RFI.

¹²⁶ Google's response to the CMA's RFI.

¹²⁷ Proposed Decision, paragraph 4.34. [Proposed decision](#). We also stated that Google's provision of access to its general search infrastructure through APIs would form part of Google's general search. For the avoidance of doubt, our finding that Google Search is in scope of the relevant digital activity however it is accessed (see paragraphs 4.9 and 4.21 above) includes through APIs. This does not in itself mean that the product accessing the infrastructure is in scope (see further below in relation to the Gemini AI assistant).

¹²⁸ Google's written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraphs 13 to 17 and 42. [Google.pdf](#).

¹²⁹ Google's response to the CMA's RFI.

- (a) That the products are offered to publishers rather than directly to end users, and branded, accessed and monetised separately from Google Search, are relevant supply-side factors, but not in themselves determinative.¹³⁰
- (b) It is not necessary for Google to have substantial and entrenched market power in organic search syndication for its syndication products to form part of the relevant digital activity (here, general search services). The concept of a digital activity in the Act is not synonymous with a product offered by a firm, and identifying a digital activity does not require an assessment of the competitive constraints on a firm or a process of market definition.¹³¹

4.32 However, in light of Google's submissions, and having carried out further evidence gathering, we have decided that Google's organic search syndication products are not within the scope of the relevant digital activity in all contexts.

4.33 Google's organic search syndication products are in many cases used by publishers to search only a narrow subset of the world wide web (eg specific sites or pages). We understand that publishers choose, at the point of becoming a syndication partner, whether their 'on-site' search tools will search the world wide web, or specific sites or pages (which is the default).¹³² See, for example, the image below.

¹³⁰ For the avoidance of doubt, the Act provides that a 'user' 'includes any person, legal or natural, and, in relation to a digital activity, means any user of the relevant service or digital content'; and that 'using' includes 'interacting, or carrying out activities that interact, in any way, directly or indirectly, with the service or digital content' (section 118(1) and (2)).

¹³¹ CMA194, paragraph 2.10. We have, however, taken into account Google's position in organic search syndication as part of our assessment of its market power in general search services: see section 5 below.

¹³² Google's response to the CMA's RFI.

Figure 4.1: Set-up page for ProSE user

Learn more'. The form contains several sections: 1. 'Name your search engine' with a text input field. 2. 'What to search?' with two radio buttons: 'Search specific sites or pages' (selected) and 'Search the entire web'. Below this, it lists examples of what can be added: 'Individual pages: www.example.com/page.html', 'Entire site: www.mysite.com/*', 'Parts of site: www.example.com/docs/* or www.example.com/docs/', and 'Entire domain: *.example.com'. There is a text input 'Enter a site or pages' and an 'Add' button. 3. 'Search settings' with two toggle switches: 'Image search' and 'SafeSearch', both currently turned off. 4. A reCAPTCHA widget with the text 'I'm not a robot'. 5. A footer note: 'By clicking 'Create', you agree with the [Terms of Service](#).' and a 'Create' button." data-bbox="90 100 891 455"/>

[Google's response to the CMA's RFI].

- 4.34 The illustration above shows that when creating an 'on-site' search tool through ProSE, the publisher is asked 'What to search?' and given the choice between 'Search specific sites or pages' and 'Search the entire web'. WSS clients can also configure that product to search the entire web.¹³³
- 4.35 Where publishers opt to configure Google's organic search syndication products to search only specific sites or pages rather than the world wide web, they have made an active choice as users of the products not to receive a 'general search' service. Similarly, from the perspective of the supply made by Google, when the products are configured in this way, they do not provide a service that searches the world wide web, and can draw on other sources, to return information on any subject.¹³⁴ They are instead analogous to specialised search products in that they draw only on information deriving from specific providers. We have therefore decided that Google's organic search syndication products are not within scope of the relevant digital activity in such instances.
- 4.36 However, where a publisher opts to configure Google's organic search syndication products to search the world wide web, they receive a general search service:

¹³³ We note that [redacted] to Google, is a WSS client. Google stated that [redacted]. Google's response to the CMA's RFI.

¹³⁴ For example, the UK government's website, gov.uk, contains a search tool powered by ProSE. Searches entered into that tool return only information on gov.uk pages.

- (a) From the supply side: when asked what inputs, in addition to its general search infrastructure, ProSE and WSS use, Google pointed to [X].¹³⁵ While the display of the results on the publisher's website may appear different from results on the Google Search SERP for the same query (for example, syndicated results do not include Google Search features such as Oneboxes, real-time results or personalised results¹³⁶ and are filtered according to the settings applied by the publisher when configuring the products), those results are produced by Google's general search infrastructure in essentially the same way as Google Search results.¹³⁷
- (b) From the demand side: the products provide publishers with 'the capability to return traditional "blue link" search results on their website(s)'.¹³⁸
- (c) The products therefore provide a service which from the supply side uses the same general search infrastructure as Google Search, and from the demand side can be used to search the world wide web and return information on any subject.

4.37 Taking into account how the products are offered and consumed, we therefore find that ProSE and WSS are within the scope of the relevant digital activity where these products are configured to provide general search:

- (a) Where the user (ie the publisher) configures the product to provide a general search service, the product is within scope; but
- (b) Where the user configures the product to search and return results from specific websites or pages (eg limited to its own website), the product is not.

Google's news products

Discover

4.38 Google describes Discover as 'a feed of queryless search results using the user's interests as an implicit query', including links to the websites where the user can

¹³⁵ Google's response to the CMA's RFI. Although Google characterised these as 'inputs', we do not consider that they are analogous to the different data source inputs on which Google's Gemini AI assistant draws, in addition to Google's general search infrastructure, to produce an 'original' response to a prompt (as explained at paragraphs 4.70-4.73 below). We therefore do not accept Google's submission that its organic search syndication products use its general search infrastructure in an analogous way to the Gemini AI assistant (Google written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 15(b) [Google.pdf](#)).

¹³⁶ Google's response to the CMA's RFI.

¹³⁷ For example, the ProSE Terms of Service explain that the ProSE search box on a publisher site passes the query over to Google, where the search query is processed and results are sent back for display on the publisher website, either formatted by Google or via the ProSE API for the publisher to format. The terms provide that 'Google will receive Queries from You [the publisher] at Google's network interface, process the Queries using Google's search engine and display search results ('Results') on a Results Page'. See [Programmable Search Engine Terms of Service - Programmable Search Engine Help](#) [Accessed on 10 September 2025].

¹³⁸ Google's response to the CMA's RFI.

access the relevant information ‘together with some contextual information similar to other search results’.¹³⁹

- 4.39 In our Proposed Decision, we stated that Discover was in scope of the relevant digital activity. We considered Discover to be in scope of general search as it appears on the Google Search app, can appear on the SERP, and uses Google’s general search infrastructure to search the world wide web. In response to the Proposed Decision, Google agreed, submitting that ‘Discover surfaces results based on utility assessments similar to results on Search main result pages’, and ‘can, in principle, draw from the full gamut of pages in Google’s Search index. Discover results are returned through the use of Google’s general search infrastructure’.¹⁴⁰ No third parties submitted that Discover should be excluded.
- 4.40 We therefore find that Discover is within the scope of the relevant digital activity.
- 4.41 In response to the Proposed Decision, we received representations from a number of third parties, in particular news publishers, asking for clarity as to which of Google’s news products were in scope of the relevant digital activity and submitting that some products we had not mentioned should be in scope. Having gathered further evidence, we set out in the following sections our findings in relation to:
- (a) The ‘News’ tab on the Google Search SERP;
 - (b) The ‘Top Stories’ carousel on the Google Search SERP; and
 - (c) Google’s standalone ‘Google News’ product.

The ‘News’ tab and ‘Top Stories’ carousel

- 4.42 The ‘Top Stories’ carousel is part of the Google Search SERP. As explained above, we consider that all information incorporated on the SERP forms part of Google’s general search. This information is an integral part of the general search product Google provides to the user. Google agrees.¹⁴¹
- 4.43 Similarly, the ‘News’ tab is accessed from the SERP and Google has described it as ‘essentially a filter within Google Search’.¹⁴²

¹³⁹ Google’s consolidated response to the CMA’s RFI.

¹⁴⁰ Google’s response to the CMA’s RFI.

¹⁴¹ Google’s consolidated response to the CMA’s RFI: ‘[t]he results that Google Search returns in response to a query on its search results page (SERP) are part of Google Search, irrespective of the technology, data source, and display format used ... all the search results that Google Search shows in response to queries are part of Google Search, irrespective of the display format’.

¹⁴² Google’s response to the CMA’s RFI. This filtering of the Google Search results distinguishes it from the tabs containing Google’s specialised search services, which are not within the scope of the relevant digital activity (see paragraph 4.11(a) above).

- 4.44 We therefore find that the ‘News’ tab and ‘Top Stories’ carousel are within the scope of the relevant digital activity.

Google News

- 4.45 In response to our Proposed Decision, some publishers submitted that ‘Google News’ should be within scope of the relevant digital activity.¹⁴³ It was not always clear whether these stakeholders intended to refer to the ‘News’ tab on the SERP or to Google’s standalone ‘Google News’ product: a news aggregation product that provides results for news articles organised around different news topics.¹⁴⁴ For the avoidance of doubt, having gathered further evidence, we set out below our findings in relation to the latter:
- (a) Unlike Discover (which, as explained above, ‘can, in principle, draw from the full gamut of pages in Google’s Search index’), Google News is limited to pages that Google has determined to come from news sources.¹⁴⁵ It returns only news content that follows Google’s content policies.¹⁴⁶
 - (b) While the results Google News returns may cover a broad range of subjects (because of the range of subjects covered by news media), they will therefore derive only from news sources, which limits their utility. For example, a search for ‘Nike trainers’ would return news stories about Nike but not websites selling or reviewing trainers.
 - (c) Google News is therefore more akin to Google’s organic search syndication products when configured to search only a subset of sites or pages (see sub-section above): it returns results only from a specific type of website.
- 4.46 We therefore find that Google News should not be listed as a product in scope of the relevant digital activity.
- 4.47 Nonetheless, we recognise and take seriously the concerns expressed by publishers about the impact of Google’s general search on the future of independent media, and the importance of such media to society. Our decision that Google News – which accounts for a much smaller number of daily active users than Discover¹⁴⁷ – is not in scope of the relevant digital activity does not remove our ability to intervene in relation to Google News in certain

¹⁴³ DMG Media’s response dated 22 July 2025 to consultation on Proposed Decision Report of 24 June 2025; Guardian Media Group’s response dated 22 July 2025 to consultation on Proposed Decision Report of 24 June 2025; European Publishers Council’s response dated 21 July 2025 to consultation on Proposed Decision Report of 24 June 2025; News Media Association’s response dated 22 July 2025 to consultation on Proposed Decision Report of 24 June 2025. See [Proposed decision report: SMS investigation into Google’s general search and search advertising services - GOV.UK](#).

¹⁴⁴ Google’s response to the CMA’s RFI.

¹⁴⁵ Google’s response to the CMA’s RFI.

¹⁴⁶ Google’s response to the CMA’s RFI. Unlike the ‘News’ tab or ‘Top Stories’ carousel, Google News is not part of or a filter on the Google Search SERP.

¹⁴⁷ Google’s data shows that Google News receives [X]% as many daily active users as does Discover, and [X]% as many daily active users as does Search: CMA analysis based on data in Google’s submission to the CMA.

circumstances. The Act provides the CMA with power to impose conduct requirements to address ‘leveraging into’ and ‘out of’ the relevant digital activity.¹⁴⁸ Such provisions could, for example, be used to address concerns about Google News receiving preferential treatment in Google Search results, or tying between Google Search and Google News, if appropriate and proportionate.

The relationship between AI and general search

4.48 Recent developments in AI have led to the evolution of Google’s search products and tools to respond to user queries. Google has increasingly integrated AI features into its general search infrastructure, for example through the addition of AI Overviews to the search engine results page, and the addition of the AI Mode tab to Google Search. We have also seen the emergence of AI assistants including Google’s Gemini AI assistant, which enable users to receive responses to queries based on generative-AI models. We consider both these developments below.

AI incorporated in Google’s general search infrastructure

4.49 As explained above, AI systems form part of Google’s general search infrastructure:

- (a) In the ITC, we explained that Google has developed and integrated AI into its general search in a variety of ways.¹⁴⁹ Google has further explained that it ‘has been using machine learning and AI technology in Search for at least a decade’.¹⁵⁰
- (b) Google launched AI Overviews in the UK in 2024 as a search feature which provides a quick answer on the SERP in response to a user’s query that is created by generative AI algorithms.¹⁵¹ Google has also recently launched ‘AI Mode’ to UK users in July 2025, which allows users to ‘ask anything on [their] mind [...] and instantly receive an AI-powered response that really understands [their] question, gives [them] the information [they]’re looking for and helps [them] dig deeper into the topic’ and which is built directly into Google Search.¹⁵²

¹⁴⁸ Section 20(3)(b), (c) and (d) of the Act.

¹⁴⁹ ITC, paragraph 18. [Invitation to comment](#).

¹⁵⁰ Google’s consolidated response to the CMA’s RFI.

¹⁵¹ Google’s consolidated response to the CMA’s RFI.

¹⁵² Google Announcement of 5 March 2025 ‘Expanding AI Overviews and introducing AI Mode’. [Expanding AI Overviews and introducing AI Mode](#); Google announcement of 28 July 2025, ‘Google Search: Introducing AI Mode in the UK’. [AI Mode now available on Google Search in the UK](#).

- 4.50 Google agreed that AI Overviews and AI Mode form part of its general search¹⁵³ – stating that they are ‘deeply embedded within the Search infrastructure and are directly powered by Search technologies’.¹⁵⁴
- 4.51 We also received views from third party stakeholders on the inclusion of AI Overviews and AI Mode within the scope of general search during the consultations on our ITC and our Proposed Decision. We did not receive any responses at either stage of our investigation which submitted that AI Overviews or AI Mode should be excluded from the scope of the relevant digital activity, with many respondents at both stages indicating support for their inclusion.
- (a) A number of respondents to the ITC (DMG Media, European Publishers Council (**EPC**), Foxglove,¹⁵⁵ News Media Association (**NMA**), Open Markets Institute, the Professional Publishers Association (**PPA**) and Skyscanner) were supportive of the inclusion of AI Overviews within the scope of designation, with one respondent (NMA) stating that Google’s ability to ‘integrate its FM applications into its search engine is dependent on the underlying web crawling that it conducts to create its traditional SERP’.¹⁵⁶
 - (b) In its response to the ITC, Raptive submitted that Google Search now consists of ‘two separate products, tied together with a common interface’, ie web search (search results that are intended to describe or summarise a web page that might provide the information searched for) and zero-click search (described as AI-generated or otherwise obtained information within the SERP).¹⁵⁷
 - (c) In response to the Proposed Decision, many stakeholders indicated support for the inclusion of AI Overviews and AI Mode,¹⁵⁸ with one respondent (Trainline) commenting that inclusion of AI Overviews and AI Mode within

¹⁵³ Google’s submission to the DMBC Sub-Committee: ‘We agree that information incorporated in our search engine results page, including AI Overviews and AI Mode, should be considered as part of Search.’ Google’s letter to the DMBC Sub Committee: ‘AI Overviews are not a separable service; they are a response to queries that UK users put to Search. They are generated with Search technologies. And they serve the same purpose as our other search results’.

¹⁵⁴ Google’s response to the CMA’s RFI.

¹⁵⁵ While Foxglove ‘welcome[s] the CMA’s inclusion of Google’s AI Overviews as one of the search features of Google’s search engine results page’ it stated that ‘Google’s AI Overviews is in a separate product market’. Foxglove’s response dated 10 February 2025 to the invitation to comment dated 14 January 2025, page 1.

<https://www.gov.uk/government/consultations/sms-investigation-into-googles-general-search-and-search-advertising-services>.

¹⁵⁶ News Media Association’s response dated 3 February 2025 to the invitation to comment dated 14 January 2025, page 1. <https://www.gov.uk/government/consultations/sms-investigation-into-googles-general-search-and-search-advertising-services>.

¹⁵⁷ Raptive’s response dated 31 January 2025 to the invitation to comment dated 14 January 2025, page 1. <https://www.gov.uk/government/consultations/sms-investigation-into-googles-general-search-and-search-advertising-services>.

¹⁵⁸ Anya Schiffrin; DMG Media; European Publishers Council; Guardian Media Group; Independent Media Association; Knight-Georgetown Institute; News Media Association; Platform Leaders; Trainline; [X] [Anonymous]; [X]. [Proposed decision report: SMS investigation into Google’s general search and search advertising services - GOV.UK](#).

scope accurately 'reflect[s] the increasing role the functionality plays in Google's general search infrastructure today'.¹⁵⁹

- 4.52 Accordingly, we find that AI Overviews form part of Google's general search. AI Overviews are an integral part of the product that is provided to a user of general search (they feature as part of the SERP), and Google has publicly described them as an evolution of search. We also find that AI Mode forms part of Google's general search for the same reasons.

Google's Gemini AI assistant

- 4.53 When we launched the investigation, we explained that a particular avenue of inquiry would be 'the extent to which Google's AI interfaces which perform search-related activities, such as Gemini AI Assistant, should be included within the scope of any designated activity'.¹⁶⁰
- 4.54 In the Proposed Decision, we set our provisional view that the Gemini AI assistant should not be listed as a product within the scope of the relevant digital activity.
- 4.55 We have carefully considered the feedback received from third parties in response to our Proposed Decision on this point. The representations we received were mixed, with some third parties expressing support for our proposal and others disagreeing – though none provided new evidence or arguments beyond those we considered in reaching our Proposed Decision.¹⁶¹
- 4.56 For the reasons set out in this section, we find that the Gemini AI assistant is not currently within the scope of the relevant digital activity.

The Gemini AI assistant as an access point

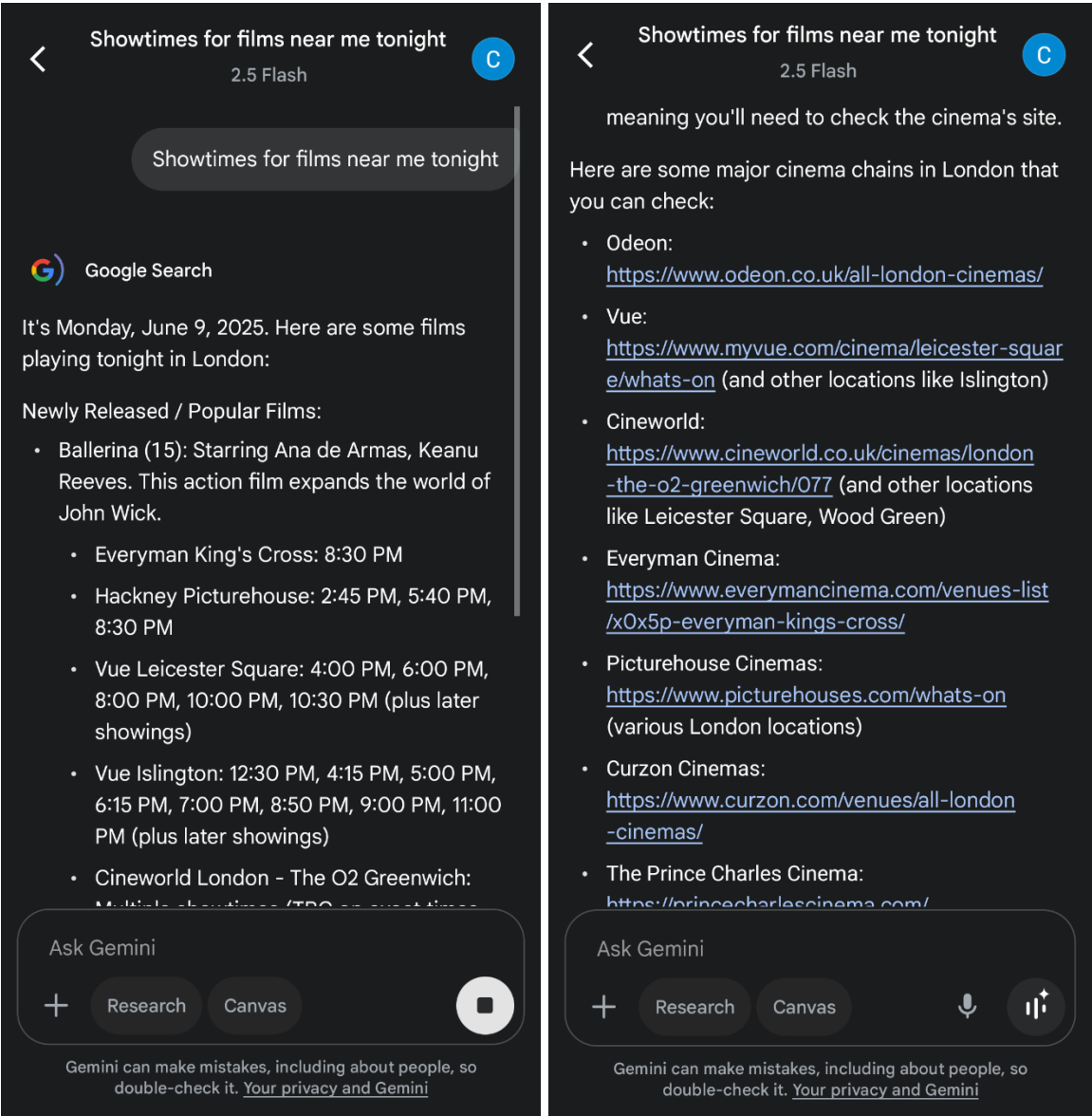
- 4.57 We have observed that sometimes, the response produced by the Gemini AI assistant appears very similar to the Google Search SERP and/or takes the user to the SERP. See, for example, the illustrations below:

¹⁵⁹ Trainline's response dated 1 August 2025 to consultation on Proposed Decision Report dated 24 June 2025, page 3. [Trainline.pdf](#).

¹⁶⁰ ITC, paragraph 25. [Invitation to comment](#).

¹⁶¹ Responses which disagreed with the exclusion of Gemini AI assistant: DMG Media; European Publishers Council; Guardian Media Group; Independent Media Association; Knight-Georgetown Institute; Movement for an Open Web; News Media Association; Paul Heidhues, Gene Kimmelman, Giorgio Monti, Monika Schnitzer, and Fiona Scott Morton; [X]. Responses which agreed with the exclusion of Gemini AI assistant: Center for Data Innovation, Which? and Platform Leaders; [X]. [Proposed decision report: SMS investigation into Google's general search and search advertising services - GOV.UK](#).

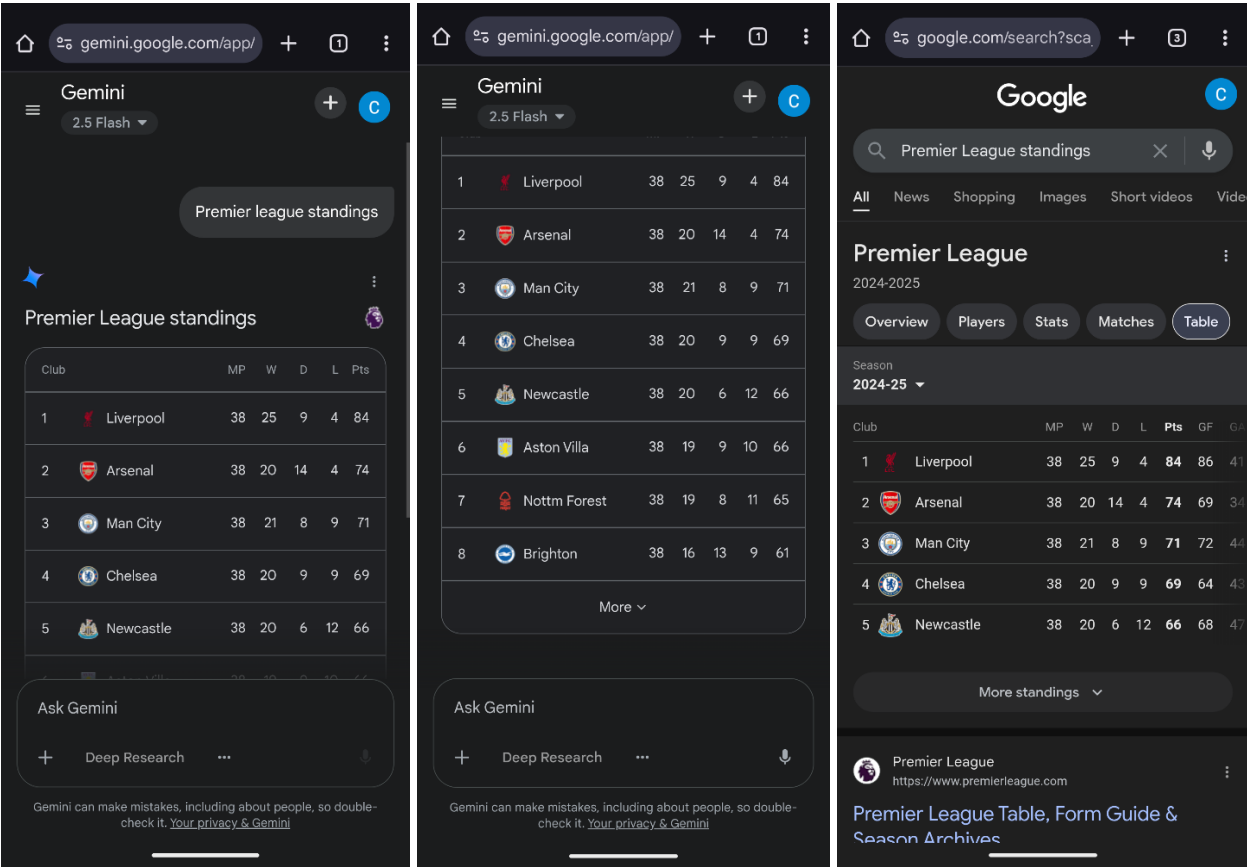
Figure 4.2: Interaction with Gemini AI assistant



Source: CMA screenshots¹⁶²

¹⁶² Screenshots taken by the CMA on the Gemini application (default version, 2.5 Flash), using a Google Pixel 9, 9 June 2025.

Figure 4.3: Interaction with Gemini AI assistant



Source: CMA screenshots¹⁶³

- 4.58 In the first example above, the Gemini AI assistant displays a Google Search icon when processing a user prompt and includes links to webpages in its response.
- 4.59 In the second example above, the Gemini AI assistant returns a table of results in response to a user prompt. When the user clicks on the 'More' field, the user is taken to the Google Search SERP.
- 4.60 We therefore find that Google's Gemini AI assistant can at least be characterised as an access point to Google's general search.
- 4.61 Other Google products (for example, its Chrome browser and Home smart speakers) also allow users to access Google's general search. However, we do not consider that a Google product would automatically be within the scope of the relevant digital activity simply by virtue of functioning as an access point. We have not therefore listed such products as themselves within the scope of the relevant digital activity.

¹⁶³ Screenshots taken by the CMA on the Gemini web browser (default version, 2.5 Flash), using a Google Pixel 9, 9 June 2025.

4.62 We have carefully considered the evidence of how Google’s Gemini AI assistant is offered and consumed, in order to decide whether it is currently within the scope of the relevant digital activity.¹⁶⁴

4.63 We set out below:

- (a) The evidence we have seen on how Gemini AI assistant is currently offered, ie the supply side;
- (b) The evidence we have seen on how Gemini AI assistant, and AI assistants more generally, are currently consumed, ie the demand side; and
- (c) Our overall conclusion.

The supply side

4.64 Google submitted that its Gemini AI assistant is distinct from Google Search in terms of:¹⁶⁵

- (a) access point and branding, as Gemini AI assistant is accessed through dedicated interfaces (such as the Google Gemini app and the Gemini web domain) which are separate from Google Search and from the SERP; and
- (b) business model and organisational structure, with Gemini AI assistant being currently monetised through a subscription model.

4.65 Google also submitted that its Gemini AI assistant is distinct from Google Search in terms of technical infrastructure – Gemini AI assistant’s infrastructure, while ‘standalone’, is ‘connected in various ways to input sources’ including APIs, one of which is a Google Search API.¹⁶⁶

4.66 Our proposal when launching the investigation – that the Gemini AI assistant would be in scope ‘when using the Google Search infrastructure’ – reflected Google’s public statements that the Gemini AI assistant ‘taps into Google search results’ to provide responses to queries.¹⁶⁷ Our understanding of how this takes place developed over the course of the investigation.

4.67 Google explained that a user-level product incorporating a generative AI model (such as the Gemini AI assistant) may rely on search results to increase the accuracy of responses and include reference to websites in its output. This is referred to as ‘grounding’ the output. Google clarified that its Gemini AI assistant

¹⁶⁴ CMA194, paragraph 2.10.

¹⁶⁵ Google’s consolidated response to the CMA’s RFI.

¹⁶⁶ Google’s consolidated response to the CMA’s RFI.

¹⁶⁷ ITC, paragraph 19. [Invitation to comment](#).

‘grounds’ by drawing on (or ‘calling’) a Google Search API¹⁶⁸ – alongside many other inputs – in a minority of cases ([REDACTED] of prompts).¹⁶⁹

4.68 Google explained that grounding ‘typically involves generating a query that is sent to Google Search. Google Search will then generate search results based on the query and send those results back. These results are then taken into account in generating and validating the ultimate response that is shown to the user’.¹⁷⁰

4.69 Google further explained that:¹⁷¹

‘When the Search API receives the search queries created by Gemini AI assistant from the user’s prompt, these are sent to Search, which in turn retrieves and ranks information from its index to produce a set of search results that it returns to Gemini AI assistant via the Search API. [REDACTED]’.

4.70 However, Google explained that where the Search API is ‘called’, the information returned is incorporated into the ‘context’ Gemini uses to generate an original response.¹⁷² Google submitted that its generative AI foundation models, such as the large language model (**LLM**) that underlies the Gemini AI assistant, ‘do not operate as databases or retrieval systems. The model generates original responses based on a statistical estimation of what a satisfactory response should look like – it does not retrieve previously stored information’.¹⁷³

4.71 We therefore understand that in those use cases where the Gemini AI assistant calls on Google’s general search infrastructure, it acts as an intermediary between Google’s general search and the end user: the Gemini AI assistant itself ‘uses’ Google Search and incorporates the results as an input into the context used to generate the ‘original’ output it delivers in response to a prompt.

4.72 The input provided by Google Search to the Gemini AI assistant is within the scope of the relevant digital activity, as would be the case for any user of Google’s general search. However, we do not consider that the operation carried out by the Gemini AI assistant in these ‘grounding’ use cases – of ‘blending’ that input with other inputs to inform an output generated by a statistical estimation of a satisfactory response – is sufficient in itself to bring the Gemini AI assistant within the scope of the relevant digital activity.¹⁷⁴

¹⁶⁸ There is [REDACTED] ‘Search API’ made available for grounding with Google Search: Google provides [REDACTED] Search API arrangements to Gemini AI assistant for grounding, [REDACTED] API arrangements are made available to third parties on the Vertex AI platform via ‘Grounding with Google Search’ (**GWGS**). [REDACTED]. See Google’s response to the CMA’s RFI.

¹⁶⁹ Google’s consolidated response to the CMA’s RFI. See also Search Infrastructure technical teach-in call note. Google submission to the CMA.

¹⁷⁰ Google’s consolidated response to the CMA’s RFI. See also [REDACTED].

¹⁷¹ Google submission to the CMA.

¹⁷² Google’s consolidated response to the CMA’s RFI. See also Search Infrastructure’ technical teach-in call note.

¹⁷³ Google’s consolidated response to the CMA’s RFI.

¹⁷⁴ We therefore do not accept the submissions of third parties that the Gemini AI assistant should be within the scope on the basis that it calls on Google Search to answer user queries, returning structured results in response.

The demand side

- 4.73 In identifying a digital activity and considering which of a firm's products it may comprise, we consider both how those products are offered and how they are consumed.¹⁷⁵ We have therefore also considered whether, from a demand side perspective, the Gemini AI assistant provides general search.
- 4.74 Google submitted that its Gemini AI assistant operates in a broader competitive environment in which it has a comparatively small market share;¹⁷⁶ and that generative AI 'is a nascent space at an early stage of development and adoption.'¹⁷⁷ Computer & Communications Industry Association (**CCIA**) made a similar submission in response to the ITC.¹⁷⁸
- 4.75 We recognise this point. As explained in section 5 below:
- (a) The consumer research we commissioned, and the data on product usage we obtained, show that while consumers are using AI assistants, their overall usage is currently low compared with use of traditional search engines.
 - (b) Although use of AI assistants is growing, when all types of queries submitted to all AI assistants (ChatGPT, Perplexity, Microsoft Copilot, Meta AI, and Google's Gemini AI assistant) are aggregated, they are equivalent to about [5-10]% of the volume of queries submitted to Google Search.¹⁷⁹
 - (c) The Gemini AI assistant itself accounts for a minority of those queries (equivalent to [less than 1]% of queries submitted to Google Search), in relation to non-business users.^{180, 181} ChatGPT is the market leader, with Gemini and Microsoft Copilot each used by less than a quarter of regular AI assistant users (see paragraph 5.54(b) below).
- 4.76 Google further submitted that the Gemini AI assistant is distinct from its general search in terms of purpose and functionality: 'It is predominantly focused on content generation, rather than on information retrieval. It has a wide range of use cases, including generating creative content (eg, conversational responses, creative text, images, code) and responding to commands (eg, to make calls, play

¹⁷⁵ CMA194, paragraph 2.10.

¹⁷⁶ Google's consolidated response to the CMA's RFI. See also Sub-committee meeting with Google and Google letter to the DMBC Sub Committee.

¹⁷⁷ Google's consolidated response to the CMA's RFI.

¹⁷⁸ Computer & Communications Industry Association's response dated 3 February 2025 to invitation to comment dated 14 January 2025, page 1. <https://www.gov.uk/government/consultations/sms-investigation-into-googles-general-search-and-search-advertising-services>.

¹⁷⁹ See Figure 5.2 and paragraphs 5.27-5.28 below.

¹⁸⁰ Google's consolidated response to the CMA's RFI.

¹⁸¹ We note that queries made on Google Search and AI assistants are not directly comparable. Google refers to queries on Gemini as 'prompts'. It defines a 'prompt' as 'a single statement, instruction or question that is given to Gemini Assistant to guide it towards generating a specific response'. Google's consolidated response to the CMA's RFI.

music or control smart home devices), and thus serves a distinct end user demand'.¹⁸²

- 4.77 We also recognise that the Gemini AI assistant has many use cases, not all of which would appropriately be characterised as general search. This is consistent with research reported in Google's internal documents, which found that although AI assistants are being used for some search-like tasks, they are more often used for answering complex questions, content creation (eg writing code) and idea generation.¹⁸³
- 4.78 However, the consumer research and consumer survey we commissioned for this investigation indicated that, for some users and some use cases, AI assistants such as Gemini are beginning to be consumed in a way akin to general search.
- 4.79 The qualitative consumer research conducted by Thinks Insight and Strategy found that:
- (a) AI assistant users are forming new habits, as the more they reported using AI assistants to 'search' (see sub-paragraph (b) below for the meaning of this term in context), the more they embedded them into their regular search behaviours.¹⁸⁴ With increased use over time, users reported becoming more proficient in the use of AI assistants and the ability to get more tailored responses.¹⁸⁵ The research found that most AI assistant users anticipate increasing their use of AI assistants for 'search' tasks in the future.¹⁸⁶
 - (b) AI assistant users did not always distinguish between 'search' and content generation.¹⁸⁷ For example, a user might use an AI assistant to find a generic CV template and then get support with writing and proof-reading the user-specific content. Consumer use of AI assistants for 'search' is associated with tasks perceived as more complex or difficult, or which, when using a traditional search service, would involve multiple searches or reviewing multiple SERP links.¹⁸⁸ Using an AI assistant is seen as time- and effort-saving for these tasks. Users were, however, also observed using AI

¹⁸² Google's consolidated response to the CMA's RFI. Google also submitted that Gemini AI assistant is distinct from Google Search in terms of access point/branding, business model/organisational structure, and technical infrastructure.

¹⁸³ Google's internal document; Google's internal document.

¹⁸⁴ Thinks Insight & Strategy qualitative consumer research report, Exploring consumers' search behaviour, paragraphs 1.9, 3.18, 4.3.

¹⁸⁵ Thinks Insight & Strategy qualitative consumer research report, Exploring consumers' search behaviour, paragraph 3.18.

¹⁸⁶ Thinks Insight & Strategy qualitative consumer research report, Exploring consumers' search behaviour, paragraph 6.6.

¹⁸⁷ Thinks Insight & Strategy qualitative consumer research report, Exploring consumers' search behaviour, paragraphs 3.22-3.24.

¹⁸⁸ Thinks Insight & Strategy qualitative consumer research report, Exploring consumers' search behaviour, paragraphs 1.10, 4.4, 4.8, 4.23.

assistants for more simple and factual queries, for example to find the best price to buy a product.¹⁸⁹

- 4.80 However, there are factors that affect the inferences we can draw from the results of the qualitative consumer research:
- (a) The research used neutral language to avoid influencing the responses. Terms such as ‘look for’ and ‘find’ were used in place of ‘search for’ – and these terms were intentionally left undefined so as to allow tasks to be interpreted intuitively and shaped by respondents’ natural behaviour.¹⁹⁰ This means that we cannot assume participants necessarily had a consistent understanding of what it means to ‘search’.
 - (b) The research also found that all consumers reported still using traditional search engines alongside AI assistants.¹⁹¹ In other words, traditional search engines and AI assistants are perceived as complementary rather than fully substitutable. For example, although consumers do sometimes use AI assistants for ‘search-like’ tasks, they may resort to traditional general search engines to confirm that the output they receive is reliable, and/or carry out a ‘follow-up’ search task such as navigating to a website.¹⁹²
 - (c) The sample of consumers used for the qualitative research was composed entirely of users of AI assistants – so is not necessarily reflective of the broader consumer landscape.¹⁹³
- 4.81 The consumer survey carried out by Accent asked participants (who included both users and non-users of AI assistants) what tools they used to ‘search the web’ – defined as ‘looking for something on the internet’. Participants were asked how they would search for particular types of information, and given the options of search apps, web browsers, voice assistants – and (for those participants who had previously indicated that they used them or were unsure whether they had) ‘AI products’ (including the Gemini AI assistant).¹⁹⁴
- 4.82 The results are set out in full in the report published on the case page. We set out below some illustrations from the report.

¹⁸⁹ Thinks Insight & Strategy qualitative consumer research report, Exploring consumers’ search behaviour, paragraph 4.23 (inset ‘Case study: Ameer’).

¹⁹⁰ Thinks Insight & Strategy qualitative consumer research report, Exploring consumers’ search behaviour, page 3.

¹⁹¹ Thinks Insight & Strategy qualitative consumer research report, Exploring consumers’ search behaviour, paragraphs 3.20-3.21.

¹⁹² Thinks Insight & Strategy qualitative consumer research report, Exploring consumers’ search behaviour, paragraphs 4.5, 4.26-4.28.

¹⁹³ Thinks Insight & Strategy qualitative consumer research report, Exploring consumers’ search behaviour, page 3.

¹⁹⁴ Accent mobile consumer survey research report, Mobile Consumer Survey: Search Questions, pages 3 and 5.

Figure 4.4: which search method do consumers use most often across four uses cases (base: all respondents)¹⁹⁵

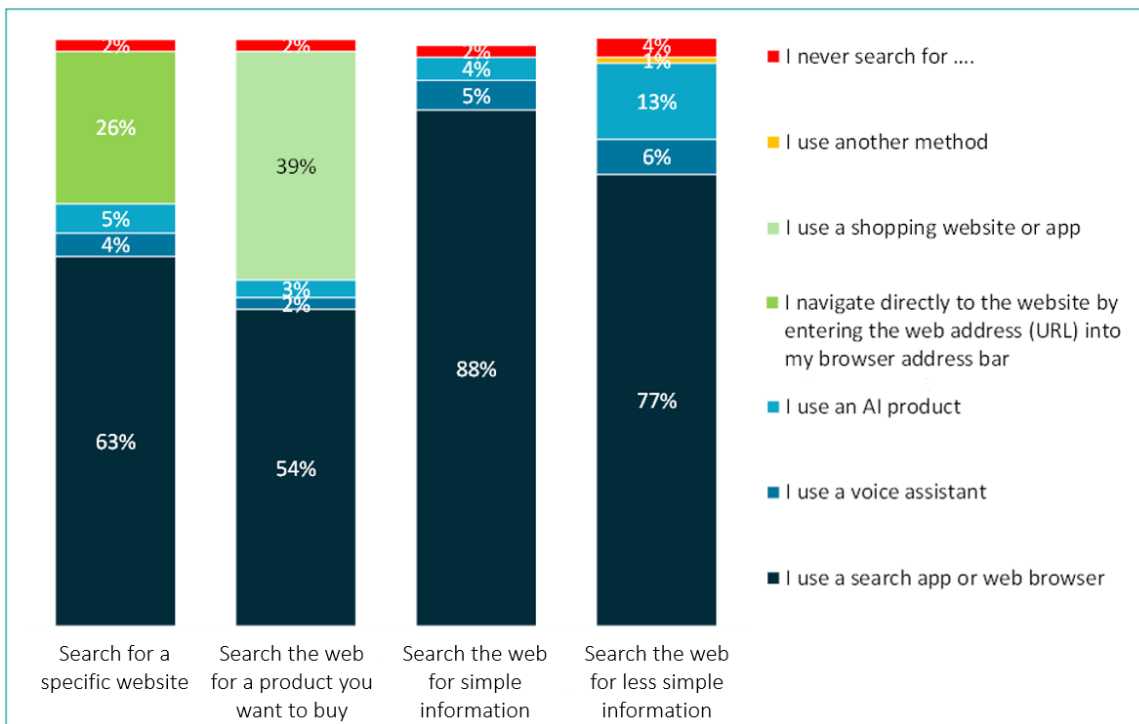
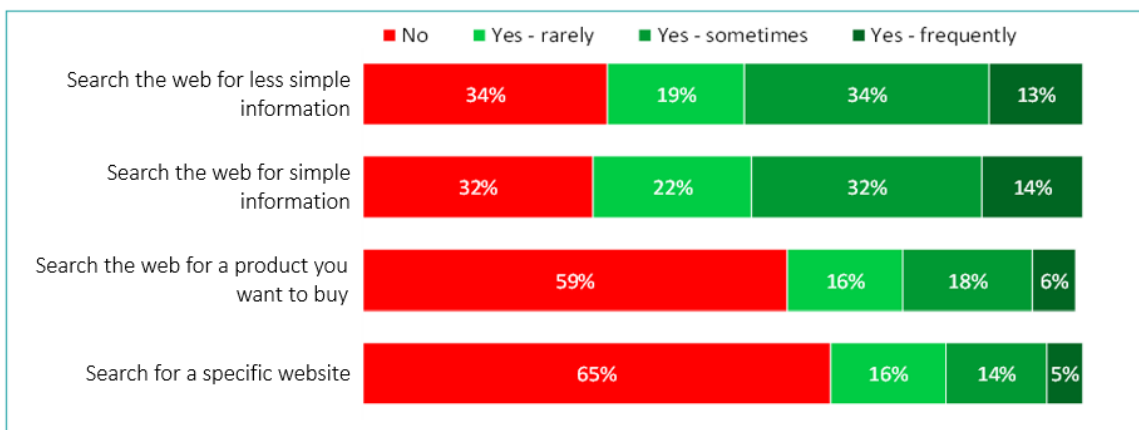


Figure 4.5: do consumers ever use AI products for particular search tasks (base: respondents who were AI product users but did not use an AI product ‘most often’ for the respective search tasks)¹⁹⁶



Participants who were AI product users but did not use an AI product ‘most often’ for the respective search tasks were asked: ‘You said an AI product would not be the method used most often for the web search task(s) below. Even though it is not the method used most often, do you ever use an AI product for these types of search tasks?’

4.83 These results indicate that some users use AI assistants such as Gemini to carry out ‘search-like’ tasks. For example, the consumer survey found that for the tasks of searching for a product to buy, searching for ‘simple information’, and searching

¹⁹⁵ Accent mobile consumer survey research report, Mobile Consumer Survey: Search Questions, Figure 2.

¹⁹⁶ Accent mobile consumer survey research report, Mobile Consumer Survey: Search Questions, Figure 4.

for a specific website, AI assistants were used ‘frequently’ or ‘most often’ by between 5% and 9% of all consumers.^{197, 198}

4.84 Research reported in Google’s internal documents found that although AI assistants are more often used for answering complex questions, content creation (eg writing code) and idea generation, they are being used for some search-like tasks, [REDACTED]. In particular:

- (a) research found that [REDACTED].¹⁹⁹ A [REDACTED] noted that [REDACTED] and that [REDACTED].²⁰⁰
- (b) a [REDACTED] report shows that some monthly users of [REDACTED].²⁰¹ [REDACTED] Google submitted that the report also demonstrates that [REDACTED], noting that the report found that [REDACTED].²⁰²
- (c) In one study, [REDACTED].²⁰³ However, Google submitted that we should not [REDACTED]. Further, Google submitted that in context, [REDACTED].²⁰⁴

Our conclusion on Google’s Gemini AI assistant

4.85 On the evidence we have seen, we find that:

- (a) From the supply side, Google’s general search is an input to its Gemini AI assistant. Taken in isolation, this connection does not suffice by itself to bring the Gemini AI assistant within the scope of the relevant digital activity: in this context the Gemini AI assistant is itself a ‘user’ of Google’s general search.²⁰⁵
- (b) From the demand side, there is evidence that some users are using AI assistants, including Gemini, in a way akin to general search. However, that evidence is mixed, and the overall proportion of such use is currently very low.

4.86 Taking the evidence in the round we find that, while Google’s Gemini AI assistant can at least be characterised as an access point to Google’s general search, it is not currently a product within the scope of the relevant digital activity. This is our

¹⁹⁷ Accent mobile consumer survey data tables, Accent_Search specific data tables_weighted, table DV43r1-DV43r3.

¹⁹⁸ The percentages in this paragraph are lower than those in Figure 4.4 because they refer to the full sample from the survey, and thus convey the level of use across the population.

¹⁹⁹ Google’s internal document.

²⁰⁰ Google’s internal document.

²⁰¹ Google’s internal document.

²⁰² Email from Google to the CMA. Google’s internal document.

²⁰³ Google’s internal document.

²⁰⁴ Email from Google to the CMA.

²⁰⁵ Google also offers an enterprise development platform (Vertex AI) on which business customers can build and use AI. Part of this service can involve grounding the AI model developed by those customers using a service known as ‘grounding with Google Search’ (GWGS). Google has explained that [REDACTED]. Google’s consolidated response to the CMA’s RFI. Google Search’s underlying infrastructure can therefore be used by Vertex AI, but we do not consider Vertex AI itself to be providing general search. As such, Vertex AI is not in scope of the relevant digital activity.

decision on the basis of the evidence we have seen, taking into account both the technological and end-user dimensions which are to some extent in tension, and in the context of a nascent and fast-evolving sector.

- 4.87 However, during the designation period it is possible that circumstances change such that, taking into account the way in which it is offered and consumed, the Gemini AI assistant may in future fall within the scope of the relevant digital activity.²⁰⁶ This is in principle true of any Google product (and there remains an obligation on Google to self-assess on an ongoing basis which of its products fall within the description of the relevant digital activity, for example as it adapts products over time, changes the functionality of products or introduces new products).²⁰⁷ But in the specific circumstances relating to the Gemini AI assistant, in particular the nascent and dynamic sector in which it operates, we are prepared to commit – over and above our legal obligations – to carrying out a public consultation prior to deciding whether to add the Gemini AI assistant to the list of Google products within the scope of the relevant digital activity.²⁰⁸
- 4.88 In our Proposed Decision, we invited views from stakeholders – both Google and others – as to the relevant factors we might take into account for these purposes. We proposed that they could, for example, include:
- (a) The scale of the Gemini AI assistant's use for 'search', in absolute terms or relative to use of Google Search and/or to use of other AI assistants for 'search';
 - (b) The evolution of use cases for the Gemini AI assistant; and/or
 - (c) Developments in the technical functionality of the Gemini AI assistant and its interlinkage with Google's general search infrastructure.
- 4.89 In response to the Proposed Decision, Google submitted that any re-assessment of whether the Gemini AI assistant is within the scope of the relevant digital activity should be on the basis of all the supply and demand factors considered in the Proposed Decision. Google submitted that proposing to revisit the issue based on 'a subset' of those factors, and/or others including those that might be proposed by third parties, undermined certainty. In particular, Google submitted that, in the

²⁰⁶ Consistent with Google's submissions, prior to the Proposed Decision, that 'use cases are evolving as the technology and offerings based on it [generative AI] evolve' and 'designation would need to take account of dynamic and evolving search technologies'. Google's consolidated response to the CMA's RFI; Google letter to the Sub-Committee. Platform Leaders and Which? made similar submissions in response to the Proposed Decision: Platform Leaders' response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, page 2. Which?'s response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, page 1. [Proposed decision report: SMS investigation into Google's general search and search advertising services - GOV.UK.](#)

²⁰⁷ CMA194, paragraphs 2.107-2.108.

²⁰⁸ We would do this under our power in section 15(4) of the Act to give a revised SMS decision notice during the designation period. We are not obliged to revise the SMS decision notice each time the SMS firm makes changes to the way it carries out the relevant digital activity. Nor does the Act provide for a formal process or for mandatory consultation prior to the CMA using the power in section 15(4) and we would not necessarily do so in every case.

interests of legal certainty, we should only revisit the issue if the circumstances relevant to key factors in the CMA's assessment were to change, such as if the Gemini AI assistant were to be branded, accessed and monetised together with Google Search and become the market leader in AI assistants.²⁰⁹

4.90 We do not accept these submissions. Our decision that the Gemini AI assistant does not currently fall within the scope of the relevant digital activity is based on considering the evidence of how it is offered and consumed in the round. This would also be the basis for any future decision that the Gemini AI assistant falls within the scope of the relevant digital activity. The CMA would not be constrained to consider only particular factors, or to act only where all the factors considered in this Decision change.^{210, 211} We set out the indicative examples above by way of illustrating the types of factors that could lead us to conduct a further consultation on this point. This provides Google, and third parties (who may also be affected by our decision),²¹² with greater certainty than is required under the Act and represents a positive step that we have taken over and above our legal obligations. However, these illustrative factors are not and cannot be exhaustive.

4.91 For the avoidance of doubt:

- (a) A future consultation on this issue would only extend to bringing the Gemini AI assistant within the scope of the relevant digital activity for its 'general search' (or, if relevant, 'search advertising') use cases. We can issue a revised SMS decision notice only where the relevant digital activity remains substantially the same.²¹³ We therefore could not use a revised SMS

²⁰⁹ Google's written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraphs 2(a) and 8-10. [Google.pdf](#); Summary of Google's oral representations to the sub-committee on 28 July 2025, paragraph 6. [Summary of Google's oral representations](#); Google email to the CMA. Google also submitted that the references to interventions impacting the Gemini AI assistant in the Roadmap conflicted with the CMA's exclusion of the Gemini AI assistant from the scope of the relevant digital activity, stating that 'Applying CRs to products outside the 'relevant digital activity' and lacking SEMP contravenes the DMCCA scheme and undermines the purpose of designation' (Google's written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraphs 2(a), 11 and 46. [Google.pdf](#)). We do not accept this submission. Notwithstanding its exclusion from the scope of the relevant digital activity, the CMA may legitimately impose interventions that impact the Gemini AI assistant. The Act expressly provides for conduct requirements addressing 'leveraging out of' and 'leveraging into' the relevant digital activity: section 20(3)(b), (c) and (d).

²¹⁰ In particular, it would not be necessary for the Gemini AI assistant to become the market leader in the AI assistants space – the relevant question would be whether the Gemini AI assistant forms part of Google's general search services in which it has SMS. Nor would it be necessary for the Gemini AI assistant to become branded, accessed and monetised together with Google Search – this is one factor contributing to our in-the-round assessment.

²¹¹ Compare the submission of the Knight-Georgetown Institute dated 22 July 2025 in response to the consultation on Proposed Decision Report dated 24 June 2025: 'In explaining its decision to consider the Gemini AI assistant out of scope of the relevant digital activity, the CMA discusses a variety of supply- and demand-side factors. Several of these factors are not very durable, ie, they would be relatively straightforward for Google to change if making such a change were viewed as being advantageous to the firm. Over-reliance on these factors could therefore create uncertainty for market participants about the scope and stability of the designation decision.' [Knight-Georgetown_Institute.pdf](#).

²¹² In response to our Proposed Decision, while some third parties supported the exclusion of the Gemini AI assistant from the scope of the relevant digital activity, others submitted that the Gemini AI assistant should be within the scope on the basis that it calls on Google Search to answer user queries, returning structured results in response. We have taken into account the Gemini AI assistant's operation of calling on Google Search as one input to produce an original response as part of our assessment of how the Gemini AI assistant is offered and consumed; but as explained in this Decision, our overall conclusion remains that the Gemini AI assistant is not currently within the scope of the relevant digital activity.

²¹³ Section 15(4) of the Act.

decision notice to designate an undertaking as having SMS in respect of a different digital activity (such as the provision of AI assistant services generally). That would require a further, separate SMS investigation.

- (b) Our decision that the Gemini AI assistant is not currently within the scope of Google's general search services is specific to our analysis of the relevant digital activity carried out by Google for the purposes of this SMS investigation and should not be taken to imply that other AI assistants might not be providing general search services. As explained in section 5 of this Decision, we recognise the developing competitive relationship between traditional search providers and AI assistants generally.

Search advertising

4.92 Search advertising usually involves an advertiser paying for an advertisement to appear next to the results from a consumer's search on an internet search engine.²¹⁴ As further detailed below, Google's search advertising on the SERP takes primarily one of two forms: text advertisements (which resemble organic search results but are labelled 'sponsored') and shopping advertisements (also known as product listing advertisements²¹⁵). The sale of search advertising is primarily based on keyword bidding, where advertisers compete for advert placements based on specific search terms, with payment typically made if the consumer clicks on the advert, ie on a 'cost-per-click' basis.²¹⁶

4.93 Google explained that advertisers can buy its search advertising through three channels – Google Ads, SA360, and through third party interfaces using the Google Ads API:²¹⁷

- (a) Google Ads²¹⁸ is an advert-buying tool which advertisers can use to display advertisements, service offerings, product listings, video content and generate mobile application installs within the Google advertising network which includes Google-owned inventory (eg Google Search and YouTube) and third-party websites.
- (b) SA360²¹⁹ is a tool that helps advertisers buy and manage search marketing campaigns across multiple advertising platforms (including Google Ads as well as Microsoft Advertising, Baidu, Facebook and others²²⁰). While advertisers can manage their adverts directly through the 'front end' of each

²¹⁴ [Online platforms and digital advertising market study](#), July 2020 (DAMS), paragraph 2.44.

²¹⁵ Since March 2024, there are two types of shopping adverts: (1) standard shopping adverts that link to websites of the comparison shopping service website's merchant partners; (2) comparison shopping service ads that link directly to their websites. Google's consolidated response to the CMA's RFI.

²¹⁶ [Online platforms and digital advertising market study](#), July 2020 (DAMS), paragraph 2.44.

²¹⁷ Google's consolidated response to the CMA's RFI.

²¹⁸ Originally named AdWords and launched in 2000.

²¹⁹ Previously known as DoubleClick Search and introduced after Google acquired DoubleClick in 2008.

²²⁰ Google's website, [Overview of supported advertising platforms - Search Ads 360 \(new experience\) Help](#).

ad buying tool like Google Ads, SA360 offers enhanced enterprise-level features that enable agencies and marketers to manage ad campaigns, including search ad campaigns, across multiple advertising platforms.

- (c) Google offers a Google Ads API which customers can use to integrate their campaign management tools with Google Ads and purchase Google search advertising through third party interfaces. The API lets developers build applications that interact directly with the Google Ads server. Advertisers can therefore purchase Google's search advertising through third party interfaces by relying on the Google Ads API.

- 4.94 Google has therefore built an extensive offering of tools which allow advertisers to reach users of its general search and it has provided options for advertisers to pool their advertising spend (including search advertising spend), eg through SA360.
- 4.95 Google has also extended its search advertising by syndicating access to its search adverts to other firms. Google syndicates its search advertising to third parties, including some third-party search engines, enabling them to monetise their own websites.²²¹
- 4.96 Where Google sells search advertising on its 'Google Search Network',²²² the resulting search adverts may appear on:
- (a) Google's own 'search sites': proprietary Google products such as Google Search, the Shopping tab, Google images, Google Maps and the Maps app; and
 - (b) 'Google search partner' sites: third party websites that have purchased Google search advertising inventory (including third party websites that have purchased syndicated search advertising through AdSense for Search (a sell-side product targeted at publishers), which allows publishers to monetise their website's search results pages by integrating Google Search text and shopping adverts).²²³
- 4.97 When an advertiser purchases search advertising on the Google Search Network, it will generally receive the same service regardless of whether the advertising appears only on Google's own 'search sites' or also on 'Google search partner'

²²¹ Ecosia's response to the CMA's RFI and [Getting listed and advertising on Ecosia's search results - Ecosia Help Center](#).

²²² The Google Search Network is a group of search-related websites and apps where adverts bought through Google Ads can appear. It includes 'Google search sites' and 'Google search partners' (which include non-Google websites, parked domains, as well as YouTube and other Google sites) [About the Google Search Network - Google Ads Help](#).

²²³ Google's website, 'AdSense for Search (AFS)', accessed 29 April 2025. [<https://support.google.com/adsense/answer/9879>]. AdSense for Search enables website owners/publishers to monetise their on-site search engine, by letting Google display paid search results targeted to users' search queries (see Google web page: [About Search ads - Google AdSense Help](#)).

sites, as both these search advertising placements are sold through the same interface and offered simultaneously by default.²²⁴ They also follow the same auction and keyword-matching process.²²⁵

- 4.98 When we began the investigation, we proposed to describe search advertising as ‘a service that allows businesses to advertise to users of general search’ – and explained that this would include all the business-facing functionality and services supporting Google’s search advertising.²²⁶
- 4.99 Google did not submit any proposed amendments to the preliminary description of search advertising set out in the Investigation Notice. In response to the ITC, no third parties made any substantive comments on the scope of search advertising, although a limited number of respondents expressed general support for the proposed scope.²²⁷
- 4.100 However, following submissions from Google that Google Ads also provides search advertising for ‘non-business’ use cases (eg a political, non-profit, or charitable purpose related to a trade, business, craft or profession),²²⁸ we proposed a small amendment to our description of search advertising in the Proposed Decision (as shown in bold below):

‘A service that enables advertising to users of general search.’

- 4.101 We received no further representations – from Google or third parties – on our proposed description of search advertising in response to our Proposed Decision.
- 4.102 With regards to the main Google products likely to be excluded from the scope of search advertising, we listed in the Investigation Notice ‘Google’s broader ‘ad tech’ products when not engaged in search advertising – for example, Google Ad Manager which provides display advertising services to publishers’. While Google agreed that its ‘ad tech’ products (through which it provides intermediation services to both advertisers and publishers), when not engaged in search advertising, would be excluded, it submitted that we should clarify that ‘ad tech products not engaged in Google search advertising should be similarly excluded’.

²²⁴ Google web page: [About the Google Search Network - Google Ads Help](#) ‘How to include or remove search partners’

²²⁵ Google web page: [About keywords in Search Network campaigns - Google Ads Help](#) ‘Where your ads appear - Google search and search partner sites’.

²²⁶ ITC, paragraph 22. [Invitation to comment](#).

²²⁷ News Media Association expressed support for the description of search advertising as set out in the Investigation Notice. News Media Association’s response dated 3 February 2025 to invitation to comment dated 14 January 2025, page 1; European Publishers Council stated that they support the scope of the investigation including search advertising. European Publishers Council’s response dated 3 February 2025 to invitation to comment dated 14 January 2025, page 5. <https://www.gov.uk/government/consultations/sms-investigation-into-googles-general-search-and-search-advertising-services>.

²²⁸ Google’s consolidated response to the CMA’s RFI. Google clarified in its consolidated response to the CMA’s RFI.

For example, Google stated that SA360, when it is used by advertisers for the purposes of buying third party ad inventory, should be excluded.²²⁹

- 4.103 In the Proposed Decision, we considered that Google's sale of display advertising should not be in scope, and we agreed that its search advertising does not cover the use of Google's products to buy and sell third party search advertising inventory (eg the use of SA360 to buy search adverts on Bing). However, we considered that the scope should cover Google's own search advertising inventory where this is placed on third party sites. We considered that limiting the scope of search advertising so as to exclude the use of Google's products to buy and sell Google search advertising inventory on third party platforms would not reflect the reality of how Google's search advertising is offered and consumed.
- 4.104 We therefore provisionally concluded that the scope of the relevant digital activity should include Google's search advertising, as provided through Google's products such as Google Ads and SA360, including where Google search advertising is placed on third party sites, for example through AdSense for Search. We did not propose to include within the scope any advertising sold through Google Ads or SA360 which does not constitute search advertising (eg video advertising on YouTube). Similarly, Google's 'ad tech' products – when not engaged in search advertising – were excluded from the proposed scope.
- 4.105 In response to our Proposed Decision, very few stakeholders commented specifically on our proposals regarding search advertising.²³⁰
- (a) A number of respondents indicated agreement with our proposed approach, for example Movement for an Open Web which noted that our proposal would 'include as in scope the advertising services that Google uses to monetise search including Google Ads, SA360 and AdSense';²³¹ and Trainline which stated that it supported the inclusion of paid results within scope of the designation.²³²
 - (b) Only one third party disagreed with our proposed approach: Fruugo.com disagreed with the exclusion of advertising sold through Google Ads which does not constitute search advertising, submitting that any paid advertising through Google Ads is 'designed to target potential customers at any point during their purchase journey, either directly (eg search results) or indirectly

²²⁹ Google's consolidated response to the CMA's RFI (emphasis original).

²³⁰ See written responses to the CMA's Proposed Decision on SMS Search: Fruugo.com's response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025; Movement for an Open Web's response dated 25 July 2025 to consultation on Proposed Decision Report dated 24 June 2025; Trainline's response dated 1 August 2025 to consultation on Proposed Decision Report dated 24 June 2025; [redacted] [Anonymous]'s response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025. [Proposed decision report: SMS investigation into Google's general search and search advertising services - GOV.UK](#).

²³¹ Movement for an Open Web's response dated 25 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, page 1. [Movement for an Open Web.pdf](#).

²³² Trainline's response 1 August 2025 to consultation on Proposed Decision Report of 24 June 2025, page 1. [Trainline.pdf](#).

(eg YouTube ads) with a view to improving the targeting performance of Google's algorithms'.²³³ We do not consider that these are reasons to expand the scope of the relevant digital activity. This investigation is focused on search advertising and does not include other forms of digital advertising such as display advertising, which is subject to different supply and demand factors and competitive conditions.

- 4.106 In response to the Proposed Decision, Google disputed our proposed scope of search advertising in one respect: the inclusion of AdSense for Search.

Google's search advertising syndication (AdSense for Search)

- 4.107 Google submitted that AdSense for Search should not be included in scope, because it did not fall within our description of search advertising.²³⁴ In particular, Google submitted that:
- (a) on the supply side: advertisers do not interact with AdSense for Search directly; it is branded, accessed and monetised separately from Google Search (including Google's search advertising services, Google Ads and SA360); it is a user of Google Search services (including its search advertising services) when delivering its own service to publishers; and it can be used by publishers without their also using its organic search syndication products; and
 - (b) on the demand side: the users are publishers, a distinct customer base from advertisers; the vast majority of publishers who use AdSense for Search are not general search engines; and AdSense for Search is not the market leader (and does not have substantial and entrenched market power) in search ad syndication services.²³⁵
- 4.108 As in relation to organic search syndication, we do not consider that Google's submissions in themselves justify excluding AdSense for Search from the scope of the relevant digital activity.²³⁶
- 4.109 Further, we note that although AdSense for Search is a publisher-facing product, it also functions as an additional channel through which advertising can be delivered:

²³³ Fruugo.com's response dated 22 July 2025 to consultation on Proposed Decision Report of 24 June 2025, page 2. [Fruugo.com Ltd.pdf](#).

²³⁴ Google's written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 18. [Google.pdf](#).

²³⁵ Google's written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraphs 20 to 21 and 42. [Google.pdf](#).

²³⁶ See paragraph 4.30 above.

- (a) Google's ad auctions cover search adverts placed on its own search sites and search partner sites via AdSense for Search (see paragraph 4.96 above);²³⁷
- (b) the default position is that ads are shown across both Google's search sites and Google search partners using AdSense for Search unless advertisers choose to opt out (see paragraph 4.97 above); and
- (c) advertisers cannot purchase AdSense for Search advertising separately from advertising via Google's search sites.²³⁸

4.110 However, in light of Google's submissions and the decision we have reached in relation to Google's organic search syndication products (see above), we have decided that not every use of AdSense for Search falls within the scope of the relevant digital activity.

4.111 Where AdSense for Search is used by a publisher to monetise search over specific sites or pages (for example where the underlying search is limited to the publisher's own website²³⁹ or queries entered into its online marketplace²⁴⁰) we find that it is not within the scope of the relevant digital activity: in these instances, AdSense for Search does not enable advertising to users of general search.

4.112 However:

- (a) As explained above, we find that where Google's organic search syndication products are configured by the publisher to search the world wide web, they provide general search.
- (b) Where that publisher also subscribes to AdSense for Search to monetise its organic search syndication, the product therefore enables advertising to users of general search.²⁴¹

4.113 We therefore find that AdSense for Search is within the scope of the relevant digital activity where it is used in conjunction with Google's organic search syndication products to provide advertising to users of general search.²⁴²

²³⁷ Google web page: [About keywords in Search Network campaigns - Google Ads Help](#) 'How they work'.

²³⁸ Sites using AdSense for Search are Google search partners. These sites extend the reach of Google search ads, offered in addition to Google's own search sites. They can be removed from a search ads campaign but not selected independently. Google web page: [About the Google search network](#) 'How to include or remove search partners'.

²³⁹ See paragraph 4.35 above.

²⁴⁰ For example, Google submits that [X] uses AdSense for Search to monetise queries on its website (Google submission to the CMA).

²⁴¹ For the avoidance of doubt, as in relation to general search syndication, our decision that AdSense for Search is within the scope of the relevant digital activity does not mean that third parties are within scope of the designation – only that Google's provision of general search services to those parties is.

²⁴² Although AdSense for Search can be used by a publisher without Google's organic search syndication, [X] of AdSense for Search identified by Google as being '[X]' is also a publisher that receives Google's organic search syndication services (Google's response to the CMA's RFI).

Grouping general search and search advertising

- 4.114 When we began our investigation, we explained that Google's search engine is a two-sided platform, offering free services to consumers financed through the sale of advertising space.²⁴³ We proposed to 'group' general search and search advertising to reflect this, 'as they can be carried out in combination with each other to fulfil the specific purpose of providing a search engine'.²⁴⁴
- 4.115 Google supported our proposal to 'group' general search and search advertising, since 'organic and paid results are inherently part of the same service'.²⁴⁵ Google explained that 'Showing paid results is how Google is able to offer its search service to users for free, and search ads are therefore part of Google Search'.²⁴⁶
- 4.116 Almost all of the third parties that responded to our ITC concerning scope also supported this proposal.²⁴⁷ Whilst almost none of the respondents to the Proposed Decision commented specifically on the proposal to group general search and search advertising, Trainline's response highlighted the importance of considering search advertising as a combined digital activity with general search.²⁴⁸
- 4.117 We find that each of general search and search advertising (as respectively described at the outset of this section of our Decision) is a digital activity within the meaning of section 3(1)(a) of the Act: each is the provision of a service by means of the internet, whether for consideration or otherwise.
- 4.118 Further, we have decided that the digital activities of general search and search advertising may be treated as a single digital activity (referred to as general search services) within the meaning of section 3(3)(b) of the Act, as they can be carried out in combination with each other to fulfil a specific purpose:²⁴⁹
- (a) Google explained that its general search infrastructure, in addition to the points listed in the sub-sections above, also includes 'Search ads systems and associated technology'.²⁵⁰ This means that search advertising systems

²⁴³ ITC, paragraph 23. [Invitation to comment](#) See also [Online platforms and digital advertising market study](#), July 2020 (DAMS), paragraphs 5.40-5.42.

²⁴⁴ Investigation Notice, paragraph 5.

²⁴⁵ Google submission to the Sub-Committee.

²⁴⁶ Google's consolidated response to the CMA's RFI.

²⁴⁷ See responses to the ITC dated 14 January 2025 from Skyscanner dated 3 February 2025 (page 3), Computer & Communications Industry Association's dated 3 February 2025 (page 1), European Publishers Council dated 3 February 2025 (page 5), News Media Association dated 3 February 2025 (page 1), Which? dated 3 February 2025 (page 1), Movement for an Open Web dated 3 February 2025 (pages 2-3), DMG Media dated 3 February 2025 (page 2), Open Markets Institute dated 3 February (pages 1-2), all of whom highlighted the complementary nature of Google's search service and associated search advertising service, suggesting that these activities should be considered together. Only Fruugo.com Ltd stated that, since one is a paid service and the other is not, general search and search advertising should not be considered as a single digital activity: Fruugo.com Ltd's response dated 3 February 2025 to invitation to comment dated 14 January 2025, page 3. <https://www.gov.uk/government/consultations/sms-investigation-into-googles-general-search-and-search-advertising-services>.

²⁴⁸ Trainline's response dated 1 August 2025 to consultation on Proposed Decision Report dated 24 June 2025, page 2. [Trainline.pdf](#).

²⁴⁹ Compare the explanatory notes to the Act, paragraph 103; and CMA194, paragraph 2.15(d).

²⁵⁰ Google's consolidated response to the CMA's RFI.

and associated technology in practice form part of both Google's general search and search advertising.

- (b) Google also explained that 'Search engines operate a two-sided business model, with users on one side and advertisers on the other. The quality of a user's search experience – which captures the relevance of search results and the usefulness, number and placement of search ads – impacts whether users will use the search engine. And, in turn, whether advertisers will benefit from placing ads on the search engine for those users to see.'²⁵¹

4.119 As we explained in our Proposed Decision, we consider that the specific purpose proposed in the Investigation Notice ('providing a search engine'), while reflecting the reality of Google's current business model, may be insufficiently flexible to allow for changes in how general search and search advertising are carried out. We have therefore decided to focus on the substantive purpose for which the two digital activities can be carried out in combination, rather than on its technical manifestation (as shown in bold below):

'Each of general search and search advertising is a digital activity within the meaning of section 3(1)(a) of the Act. Further, they may be treated as a single digital activity (general search services) within the meaning of section 3(3)(b) of the Act, as they can be carried out in combination with each other to fulfil the specific purpose of providing a **general search and search advertising platform**.'

Link to the UK

4.120 The CMA may designate an undertaking as having SMS in respect of a digital activity carried out by the undertaking where the CMA considers that the digital activity is 'linked to the UK'.²⁵²

4.121 A digital activity is linked to the UK if:²⁵³

- (a) the digital activity has a significant number of UK users;²⁵⁴
- (b) the undertaking that carries out the digital activity carries on business in the UK in relation to the digital activity; or

²⁵¹ Google's consolidated response to the CMA's RFI.

²⁵² Section 2(1)(a) of the Act.

²⁵³ Section 4 of the Act.

²⁵⁴ There is no quantitative threshold for how many UK users can be considered 'significant': the CMA's assessment may consider the firm's absolute position and/or the number of UK users it has relative to other undertakings (CMA194, paragraph 2.22).

- (c) the digital activity or the way in which the undertaking carries on the digital activity is likely to have an immediate, substantial and foreseeable effect on trade in the UK.

4.122 Based on the below evidence, we have decided that each of the conditions in the Act (any one of which would suffice) is satisfied and that therefore Google's provision of general search services is linked to the UK:

- (a) Google's general search services have a significant number of UK users: in December 2024 Google Search had [60-70] million logged-in users on mobile devices and [20-30] million on desktops;²⁵⁵
- (b) Google carries on business in the UK in relation to the provision of general search services: in 2024, Google's advertising from Google Search and Google Image Search generated £[10-20] billion of revenue in the UK (on the basis of user location where the user's IP address is in the UK);²⁵⁶ and
- (c) The way in which Google carries on general search services is likely to have an immediate, substantial and foreseeable effect on trade in the UK: in its ITC response, Google submitted that Google Search is a 'vital resource for UK businesses of all sizes'²⁵⁷ and that 'Google Search and Google Ads have helped UK businesses export over £20 billion worth of goods and services across the world annually'.²⁵⁸

²⁵⁵ Google's consolidated response to the CMA's RFI. [REDACTED]. Google's consolidated response to the CMA's RFI.

²⁵⁶ Google's consolidated response to the CMA's RFI. Google [REDACTED]. Google's consolidated response to the CMA's RFI.

²⁵⁷ Google's response dated 3 February 2025 to invitation to comment dated 14 January 2025, page 1.
<https://www.gov.uk/government/consultations/sms-investigation-into-googles-general-search-and-search-advertising-services>.

²⁵⁸ Google's response dated 3 February 2025 to invitation to comment dated 14 January 2025, page 1.
<https://www.gov.uk/government/consultations/sms-investigation-into-googles-general-search-and-search-advertising-services>.

5. THE SMS CONDITIONS

- 5.1 Having described the designated undertaking and the digital activity with respect to which the designation has effect, in this section we address the substantive conditions set out in the Act for determining whether an undertaking has strategic market status (SMS).
- 5.2 The CMA may designate an undertaking as having SMS in respect of a digital activity carried out by the undertaking where the CMA considers that the undertaking meets ‘the SMS conditions’ in respect of the digital activity.²⁵⁹
- 5.3 The SMS conditions are that the undertaking has:²⁶⁰
- (a) substantial and entrenched market power; and
 - (b) a position of strategic significance,
- in respect of the digital activity.
- 5.4 For the reasons set out in this section, we have decided that Google meets both SMS conditions in respect of general search services. On the basis of the evidence set out in this section, we also consider that Google meets both SMS conditions in respect of each of general search and search advertising as digital activities in their own right.

²⁵⁹ Section 2(1)(b) of the Act.

²⁶⁰ Section 2(2) of the Act.

Box 1: Summary of evidence that Google meets the SMS conditions in respect of general search services

- We have found that Google has had an unparalleled position in general search services for an extended period. Other traditional general search providers are significantly smaller than Google and have been for many years. Bing is the largest of these providers, but its current shares of queries and search advertising are both less than 5%. No traditional general search providers have materially grown relative to Google for at least fifteen years, including those using Google or Bing's syndication services. Specialised search providers, such as Amazon, are a limited alternative to Google's general search services, and social media platforms are not an effective alternative.
- In recent years developments in generative AI have led to the emergence of AI assistants such as ChatGPT, and we have carefully considered how these developments could affect Google's position. AI assistants, and especially ChatGPT are experiencing rapid growth. However, they have a wide variety of use cases and, although ChatGPT in particular is an emerging competitive threat to Google Search and one to which Google has responded, when considering use of AI assistants to answer queries using search infrastructure, use of AI assistants is still low compared to Google Search. It is also uncertain how the use of these products will evolve and Google is well-positioned to respond to developments in AI to maintain its market position and to ensure that AI assistants do not develop into a more sustained and significant competitive constraint to its general search services. For example, Google has incorporated generative AI features (such as AI Overviews and AI Mode) directly into its existing search products, alongside developing its own Gemini AI assistant.
- An important factor in the persistence of Google's strong position in general search services is the barriers that competitors face to developing an effective alternative product. These barriers include Google's distribution agreements (which make it challenging for others to reach users), data advantages and scale in search advertising. Google's strong positions in general search and search advertising reinforce one another, with more users helping Google to monetise its general search services and to invest in its general search services.
- Google's wider ecosystem of products also plays an important role - providing it with access to data with which it can tailor its products in ways that others cannot and with influence over some important access points to users. Many of these barriers also apply to AI assistants that could compete with Google's general search services.
- Accordingly, we have decided that Google has substantial and entrenched market power in general search services.
- It also has a position of strategic significance, based on its significant scale and the very large number of other firms across the UK that rely on it.

Substantial and entrenched market power

- 5.5 To assess whether an undertaking has substantial and entrenched market power in respect of a digital activity, the CMA must carry out a forward-looking assessment of a period of at least five years, taking into account developments that:²⁶¹
- (a) would be expected or foreseeable if the CMA did not designate the undertaking as having SMS in respect of the digital activity; and
 - (b) may affect the undertaking's conduct in carrying out the digital activity.
- 5.6 Our guidance explains the approach we will take and the types of evidence we may draw upon in assessing the first SMS condition.²⁶² In particular, our guidance explains that:
- (a) While 'substantial' refers to the extent of market power and 'entrenched' is intended to ensure a firm is not designated where its market power is only transient, our assessment of each element will typically draw on a common set of evidence.²⁶³
 - (b) Where a firm operates a two-sided (or multi-sided) platform serving distinct but related customer groups, we will generally consider both customer groups and the alternatives available to each; and the interlinkages between the sides of the platform, including the role of network effects.²⁶⁴
 - (c) Where the CMA 'groups' two or more of the firm's digital activities into a single digital activity, the SMS assessment will relate to the grouped activity as a whole. In practice, we may consider evidence relevant to market power of individual products and whether and how any interlinkages between these may contribute to market power across the digital activity, for example whether the firm's position in one activity in the group reinforces its position in another.²⁶⁵

'Substantial' market power

- 5.7 Market power arises where a firm faces limited competitive pressure and individual consumers and businesses have limited alternatives to its product or service or, even if they have good ones, they face barriers to shopping around and switching. It is often thought of as the power to raise prices profitably, but can also relate to

²⁶¹ Section 5 of the Act.

²⁶² CMA194, paragraphs 2.50-2.65.

²⁶³ CMA194, paragraph 2.54.

²⁶⁴ CMA194, paragraph 2.52.

²⁶⁵ CMA194, paragraph 2.65. See also paragraph 2.16.

the power to worsen quality, service, business models and innovation (among other things).²⁶⁶

- 5.8 Market power is ‘substantial’ when a firm does not face strong competitive constraints in respect of the digital activity.²⁶⁷
- 5.9 In response to our Proposed Decision, Google submitted that substantial market power must be ‘at least equivalent to, if not higher than, ‘dominance’ under Chapter II of the Competition Act 1998’.²⁶⁸
- 5.10 While the evidence set out in the analysis that follows could be relevant to establishing dominance under the Competition Act 1998, we do not consider that drawing this analogy is helpful. As explained in section 2 of this Decision above, the Act creates a new legal regime with a separate framework and purpose from the Competition Act 1998. It does not refer to dominance but instead adopts the test of ‘substantial and entrenched market power’.²⁶⁹ The frame of reference for that test is not a product and geographic market, established by a process of market definition, but instead the more flexible concept of a ‘digital activity’.²⁷⁰
- 5.11 As explained above, Google’s general search services encompass a number of products. While, in principle, Google may face stronger competitive constraints in relation to some of those products than in relation to others,²⁷¹ the question we have to answer is whether Google has substantial and entrenched market power in respect of the digital activity of general search services.
- 5.12 This is the legal test that we have applied to the evidence. As our guidance explains, it entails a case-specific assessment and there is no exhaustive list of factors that must be present for a firm to have substantial market power.²⁷² Relevant evidence may include indicators such as the level and stability of shares of supply, the number and strength of competitive constraints to incumbent firms, profitability levels and levels of customer switching. The sources of market power may include supply-side factors (eg network effects, economies of scale and

²⁶⁶ CMA194, paragraph 2.51 and footnote 43.

²⁶⁷ CMA194, paragraph 2.55.

²⁶⁸ Google written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 25. [Google.pdf](#).

²⁶⁹ Unlike other regimes: for example, the Communications Act 2003, which provides expressly that ‘significant market power’ is to be construed in the same way as the concept of dominance under the Competition Act 1998: section 78.

²⁷⁰ CMA194, paragraphs 2.63-2.64. See also Explanatory Notes to the Act, paragraph 109: section 5 of the Act ‘does not require the CMA to undertake a formal market definition exercise as part of an SMS investigation’.

²⁷¹ In response to the Proposed Decision, Google submitted that we had failed to assess whether Google has substantial and entrenched market power in organic search syndication and search ads syndication: Google’s written response dated 22 July 2025 to consultation on Proposed Decision Report dated 22 July 2025, paragraph 42. [Google.pdf](#). As noted above in section 4, we have clarified that Google’s syndication products are only in scope of the designation when they are being used to provide general search, or to advertise to users of general search. Our assessment below takes into account general search services provided using syndication products, for example in relation to shares of supply and the assessment of competitors. However, it is not necessary for Google to have substantial and entrenched market power in syndication for its syndication products to form part of the relevant digital activity (here, general search services).

²⁷² CMA194, paragraph 2.55.

scope, integration into wider ecosystems) and demand-side factors (eg switching costs, behavioural biases, and the role of brand and reputation).²⁷³

‘Entrenched’ market power

- 5.13 Our guidance also explains that when carrying out the forward-looking assessment to decide whether a firm’s substantial market power is entrenched, we will consider developments that may affect the firm’s market power, including (1) market developments such as emerging technology, innovation and new entrants and (2) regulatory developments.²⁷⁴
- 5.14 We will not seek to make precise predictions about the likely development of the industry. Instead, we will consider whether relevant developments are likely to be sufficient in scope, timeliness and impact to eliminate the firm’s substantial market power.²⁷⁵ Where the CMA has found evidence that the firm has substantial market power at the time of the SMS investigation, and where there is no clear and convincing evidence that relevant developments will be likely to dissipate the firm’s market power, this will generally be supportive of a finding that market power is entrenched.²⁷⁶
- 5.15 Google submitted that by applying this approach we had reversed the burden of proof, introduced a presumption of entrenchment and/or criteria for assessment without a basis in the Act; and departed from the applicable standard of proof (the balance of probabilities).²⁷⁷ We do not accept these submissions. As explained in our guidance,²⁷⁸ our assessment of whether market power is entrenched starts with market conditions and market power as of now, and considers expected and foreseeable developments over the designation period, as required by the Act. We consider what the sources of Google’s market power have been, whether these are likely to remain in the future, and whether Google’s market power has endured through previous market developments.²⁷⁹ We are not required to demonstrate that Google’s market power will definitely endure for a minimum period of five years:²⁸⁰ we have assessed the evidence on the balance of probabilities, and with no presumption one way or the other.
- 5.16 In the subsections that follow we set out the evidence we have obtained in this investigation in relation to the SMS conditions and the conclusions we draw from

²⁷³ CMA194, paragraph 2.53.

²⁷⁴ CMA194, paragraph 2.59.

²⁷⁵ CMA194, paragraph 2.60.

²⁷⁶ CMA194, paragraph 2.62.

²⁷⁷ Google’s written response dated 22 July to consultation on Proposed Decision Report dated 24 June 2025, paragraphs 3b, 37-38 and 45. [Google.pdf](#).

²⁷⁸ CMA194, paragraphs 2.60-2.62.

²⁷⁹ See further the CMA’s [summary of responses to the consultation on the draft guidance](#), paragraphs 3.18 and 3.23.

²⁸⁰ Explanatory Notes to the Act, paragraph 109: ‘The underlying policy intent is that the CMA should be satisfied that the undertaking’s power and influence in the digital activity is neither small nor transient based on their consideration of competitive conditions. However, the CMA is not required to demonstrate that the undertaking’s market power will definitely endure for a minimum period of five years.’

it. Although, in response to our Proposed Decision, Google disputed the probative value, and our assessment, of individual aspects of that evidence base,²⁸¹ our findings are based on the totality of the evidence, taken in the round.²⁸²

Evidence relating to our assessment of substantial and entrenched market power

5.17 Our overall assessment is of whether Google has substantial and entrenched market power in general search services, comprising general search and search advertising, as described in section 4. Since general search and search advertising are offered to different customer groups (users and advertisers) we have considered evidence in relation to each. However, we have also considered the relationship between general search and search advertising and evidence which relates to the position of Google's general search services overall. Therefore, in the following sections, we set out:

- (a) The evidence we have gathered in relation to:
 - (i) competition in general search;
 - (ii) competition in search advertising;
 - (iii) barriers to entry and expansion in general search services;
 - (iv) Google's profitability in general search services; and
 - (v) regulatory and other developments.
- (b) Our assessment of whether, in light of that evidence, Google has substantial and entrenched market power in respect of general search services.

Competition in general search

Introduction and Google's submissions

5.18 In this section we summarise the evidence regarding the competition Google faces in general search. As discussed in paragraph 4.11(b), Google's general search (branded Google Search) can be accessed in a variety of different ways (eg from the Google Search website or from a browser location bar).²⁸³ An important way in which Google provides general search to users is through its SERP. The exact

²⁸¹ See, for example, Google written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 3(e). [Google.pdf](#) We have addressed Google's criticisms of discrete aspects of our evidence base (the role of default positions, access to data, the scale of competition from AI assistants and the relevance of return on investment in search advertising) where relevant in the analysis below.

²⁸² CMA194, paragraph 2.80.

²⁸³ Google's consolidated response to the CMA's RFI.

layout of Google's SERP has changed over time,²⁸⁴ but, as described in Section 4, generally consists of organic search results, paid-for search results (search advertisements), as well as a range of other features such as maps, flights and hotels which are presented depending on the exact search query.²⁸⁵ A notable addition is AI Overviews and Google also launched a new AI Mode in the UK.²⁸⁶

- 5.19 Google submitted that the key dimensions it competes over in general search include: (a) relevance and quality of results, (b) speed of returning results, (c) usefulness of result format and presentation and (d) functionality and features that make it easy for users to get the results they are interested in.²⁸⁷ Google submitted that it expects this to continue to be so although developments in AI 'will continue to influence the development of online search engines' over the next five years.²⁸⁸
- 5.20 Google submitted that the main direct competitors to Google Search are other traditional general search providers, and identified Bing as Google Search's main rival in the UK.²⁸⁹ Other traditional general search providers follow a broadly similar model to Google (ie they present users with a SERP which incorporates various features).²⁹⁰
- 5.21 Google submitted that it experiences 'indirect competitive constraints' from the many 'alternative means through which users can search for and find information online.' In its submission Google specifically highlighted social media services such as [X], [X] and [X].²⁹¹ Specialised search providers are another potential alternative, which, while not explicitly mentioned by Google, were considered in the US DoJ Search Litigation.²⁹² Specialised search providers allow users to search for, compare and purchase products or services in a particular sector (see also paragraphs 4.11(a) and 4.17). Examples include Skyscanner (flights), Booking.com (accommodation), Comparethemarket (finance) and retailers which enable users to search for products (eg Amazon).
- 5.22 Over the past three years, advances in generative AI have led to the emergence of AI assistants such as ChatGPT and Google's Gemini AI assistant.²⁹³ Although AI assistants have a range of use cases, one such use case is as an alternative to

²⁸⁴ Google's consolidated response to the CMA's RFI.

²⁸⁵ TDMP, 'A guide to Google's 2024 SERP features & how to appear for them', 02 October 2024, accessed by the CMA on 09 April 2025. [A Guide to Google's 2024 SERP features - and how to appear for them | TDMP](#). [Online platforms and digital advertising market study](#), July 2020 (DAMS), paragraph 3.5 and figure 3.1.

²⁸⁶ Google, 'Google Search: Introducing AI Mode in the UK', 28 July 2025, accessed by CMA on 9 September 2025. [AI Mode now available on Google Search in the UK](#).

²⁸⁷ Google's consolidated response to the CMA's RFI.

²⁸⁸ Google's consolidated response to the CMA's RFI.

²⁸⁹ Google's consolidated response to the CMA's RFI.

²⁹⁰ [Online platforms and digital advertising market study](#), July 2020 (DAMS), paragraph 3.5 and figure 3.1.

²⁹¹ Google's consolidated response to the CMA's RFI.

²⁹² *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, paragraphs 141-158.

²⁹³ Google submitted that 'AI-powered search services' [X]. Google also submitted that '[X]'. Google's submission to the CMA.

traditional general search providers.²⁹⁴ Google submitted that the Proposed Decision included an incomplete assessment of the constraint imposed on Google in general search services by AI assistants.^{295, 296} Google highlighted the strong growth experienced by ‘prominent AI assistants’ and the ‘vast funds’ committed to providers of AI assistants by venture capital funds. Google also stated that the Proposed Decision should have assessed the constraint imposed by AI assistants by analysing ‘evidence of overall market trends, forward-looking projections, share price development, investment levels in R&D, and the history of innovation’.²⁹⁷

5.23 Given this context, in the following sections we present evidence on Google’s position in the provision of general search considering:

- (a) Shares of queries;
- (b) Bing and other traditional general search providers;
- (c) AI assistants;
- (d) Specialist search providers;
- (e) Social media platforms; and
- (f) Other potential alternatives to Google’s general search.

Shares of queries

5.24 Google has accounted for a persistently very high and stable share of queries relative to other traditional general search providers such as Bing. As shown in Figure 5.1 below, Google’s share of supply has been between [90-100]% and [90-100]% throughout the last seven years. Bing had the next highest share at approximately [0-5]%.²⁹⁸ These shares also include providers using Bing or

²⁹⁴ When asked about the extent to which users switch between Google Search and AI assistants, Google did not comment explicitly on this issue. Google submitted that generative AI ‘is a nascent space at an early stage of development and adoption.’ Google’s consolidated response to the CMA’s RFI.

²⁹⁵ Google’s written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 34. [Google.pdf](#).

²⁹⁶ Two third parties made similar submissions in response to the Proposed Decision. The Center for Data Innovation recommended that we ‘[e]xplicitly factor in the disruptive potential of AI as part of [our] assessment of “substantial and entrenched market power”’. Center for Data Innovation’s response dated 22 July 2025 to consultation on Proposed Decision Report of 24 June 2025, page 1; The Computer & Communications Industry Association stated that ‘Overall usage of AI assistants is growing rapidly. There is no reason to believe that in 5 years they will not be an even more significant competitive constraint on Search for many categories of enquiry’. Computer Communications Industry Association’s response dated 22 July 2025 to consultation on Proposed Decision Report of 24 June 2025, page 1. [Proposed decision report: SMS investigation into Google’s general search and search advertising services - GOV.UK](#).

²⁹⁷ Google’s written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraphs 36 and 38. [Google.pdf](#).

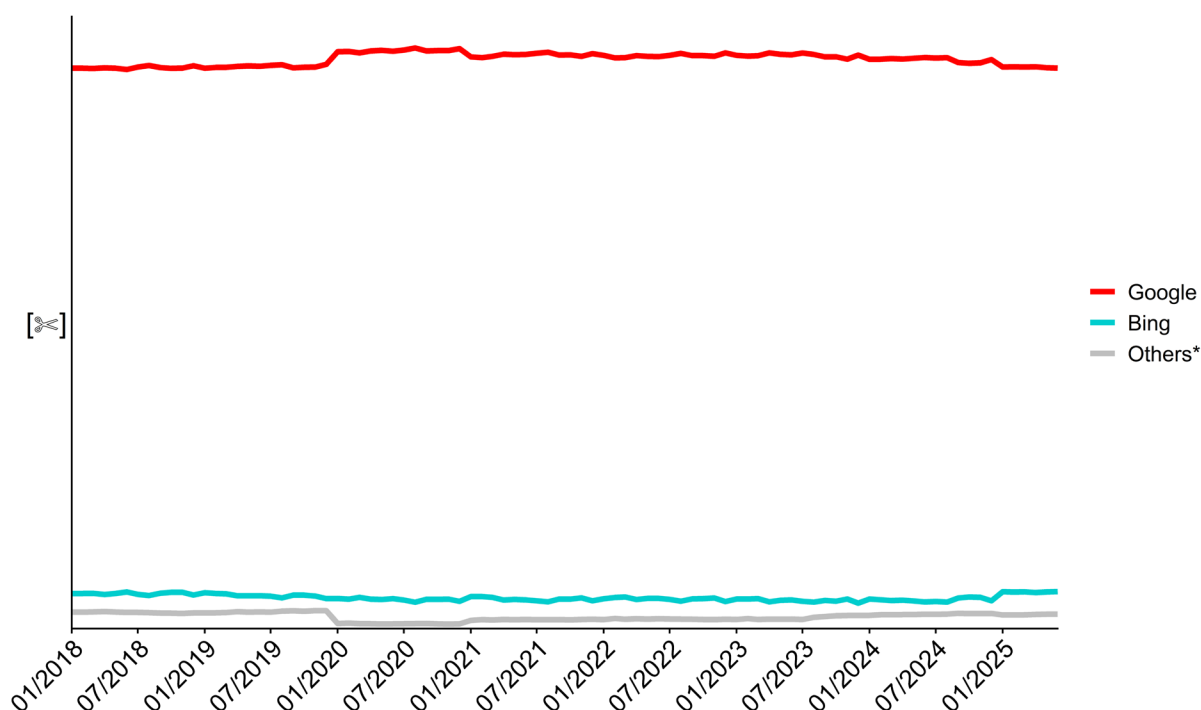
²⁹⁸ See [redacted] responses to the CMA’s RFI. See [redacted] response to the CMA’s RFI. See [redacted] response to the CMA’s RFI. See [redacted] responses to the CMA’s RFI. See [redacted] response to the CMA’s RFI. See Google’s response to the CMA’s RFI. Google’s response to the CMA’s RFI.

[redacted] response to the CMA’s RFI and [redacted] response to the CMA’s RFI.

[redacted] response to the CMA’s RFI and [redacted] submission to the CMA.

Google's syndication products to provide general search services, and we have taken account of these products as part of our competitive assessment.

Figure 5.1 Shares of total queries for traditional general search providers in the UK (January 2018-June 2025)



Source: CMA analysis of parties' data.

*Others include Brave, DuckDuckGo, Ecosia, Mojeek, and Yahoo.

Note: Not all traditional general search providers were able to provide data for the complete period. This accounts for the decline in the share of 'Others' in 2020.

5.25 Mobile searches account for a high and growing proportion of queries to traditional general search providers: [70-80]% of all queries to these providers in the UK in 2024 were on mobile devices, up from [60-70]% in 2020.²⁹⁹ Google's share of queries is close to [90-100]% ([%]) in mobile and very high in desktop ([80-90]%).^{300, 301}

5.26 Since late 2022, AI assistants, such as ChatGPT, have emerged and some of these providers have seen rapid growth in their usage. For example, ChatGPT's total monthly query volume grew substantially between September 2024 and June

²⁹⁹ See [%] responses to the CMA's RFI. See [%] response to the CMA's RFI. See [%] response to the CMA's RFI.

³⁰⁰ Google's consolidated response to the CMA's RFI.

³⁰¹ Figures for 2024.

2025.³⁰² To provide context for the evidence on AI assistants discussed below we have considered the scale of AI assistants compared to traditional general search providers. To do this we have considered:

- (a) The scale of AI assistants compared to traditional general search providers based on all queries submitted (ie regardless of use case);
- (b) The scale of AI assistants compared to traditional general search providers based on **search-grounded AI queries** (ie the subset of queries submitted to AI assistants for which general search infrastructure is used to generate the answer); and
- (c) The scale of AI assistants compared to the presentation of generative AI results on traditional general search providers ie queries for which Google displays an AI Overview, and for which Bing's Generative Search feature is used.

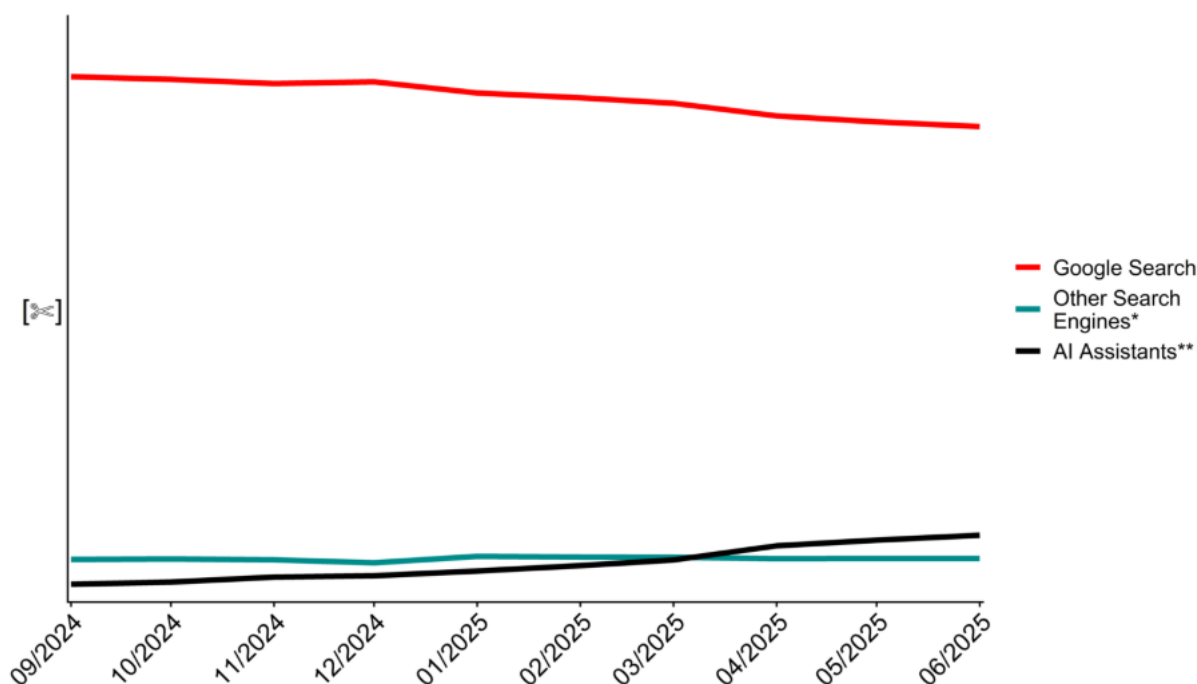
5.27 First, Figure 5.2 shows the share of all queries for AI assistants and traditional general search providers in the UK for September 2024 to June 2025. It is important to note the following limitations:

- (a) This data is for all queries submitted to traditional general search providers and AI assistants. However, as discussed below, AI assistants have a variety of use cases and only some of these overlap with the use cases for general search.
- (b) AI assistants have the ability to answer more complicated queries which would typically have taken multiple queries on a traditional general search provider, albeit Google is incorporating such functionality directly into its general search products.³⁰³

³⁰² OpenAI's follow up response to the CMA's RFI.

³⁰³ See for example Google article 'AI Mode in Google Search: Updates', 20 May 2025, accessed by CMA on 11 June 2025, [AI Mode in Google Search: Updates from Google I/O 2025](#) which states 'there's been a profound shift in how people are using Google Search. People are coming to Google to ask more of their questions, including more complex, longer and multimodal questions.'

Figure 5.2 Shares of queries for traditional general search providers and AI assistants in the UK (September 2024 – June 2025)



Source: CMA analysis of parties' data.

* Other Search Engines include: Bing, Yahoo, Ecosia, DuckDuckGo, Brave and Mojeek

**AI assistants include: ChatGPT, Gemini, Perplexity, Copilot and Meta AI. We have excluded Claude.ai and [redacted] as these suppliers have stated that they do not compete with Google's general search products.³⁰⁴ [redacted].

5.28 As Figure 5.2 shows, Google Search still receives significantly more queries than AI assistants in the UK, although its share of total queries (across all use cases) has declined to just over [70-80]%.³⁰⁵ In contrast, in June 2025 the volume of queries received by ChatGPT, the largest AI assistant by query volume, was [10-15]% of the queries received by Google Search, up from [0-5]% in December 2024.³⁰⁶ Other AI assistants account for a much smaller volume of all queries with Google's Gemini AI assistant accounting for only [0-5]% of queries to AI assistants in June 2025.³⁰⁷

5.29 Second, Figure 5.3 shows the share of queries for AI assistants and traditional general search providers in the UK focussing on search-grounded AI queries.³⁰⁸ These queries are more likely to reflect the subset of queries where an AI

³⁰⁴ Anthropic's submission to the CMA. Anthropic's response to the CMA's RFI; [redacted] response to the CMA's RFI.

³⁰⁵ See [redacted] responses to the CMA's RFI. See [redacted] responses to the CMA's RFI.

³⁰⁶ Google's consolidated response to the CMA's RFI. Google's response to the CMA's RFI. OpenAI's response to the CMA's RFI. OpenAI's follow up response to the CMA's RFI.

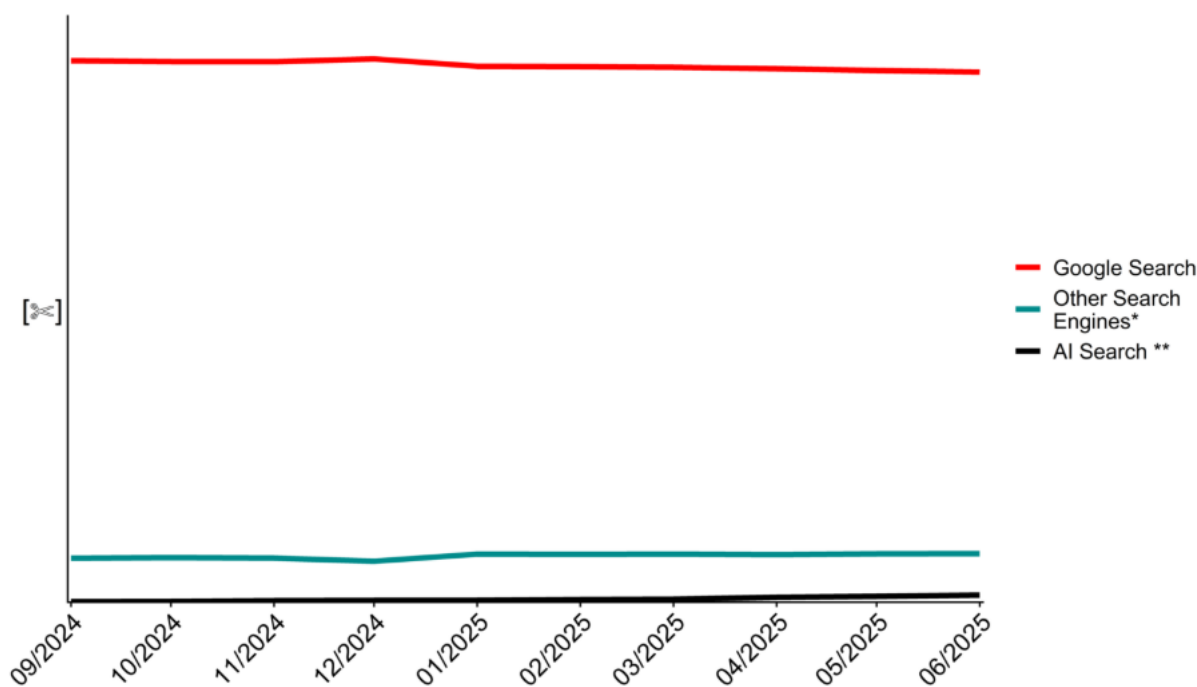
³⁰⁷ See [redacted] responses to the CMA's RFI.

³⁰⁸ ie the subset of queries to these providers that are grounded using search infrastructure.

assistant is being used as an alternative to (and therefore may be competing with) Google Search.³⁰⁹

5.30 Despite the significant growth of AI assistants, search-grounded AI queries continue to be a fraction of the volume of queries received by Google Search. Specifically, on this basis, AI assistant queries are only [0-5]% of the volume of Google Search queries and Google Search accounts for over 90% of queries throughout September 2024 to June 2025.

Figure 5.3 Shares of search-grounded queries for traditional general search providers and AI assistants in the UK (September 2024 – June 2025)



* Other Search Engines include: Bing, Yahoo, Ecosia, DuckDuckGo, Brave and Mojeeek

**AI Search includes: ChatGPT Search, Perplexity and Meta AI

Notes: Perplexity submitted that the 'vast majority' of its queries are grounded using Perplexity's web index.³¹⁰ As such we have approximated the number of Perplexity search queries to be all queries submitted to the Perplexity Answer Engine. Meta submitted that between 7 July and 6 August 2025, [20-30]% of queries submitted to Meta AI in the UK were grounded in search infrastructure.³¹¹ As an estimate of the number of Meta search-grounded AI queries in other months, we have taken this number to be [20-30]% of total queries submitted to Meta AI in that month.

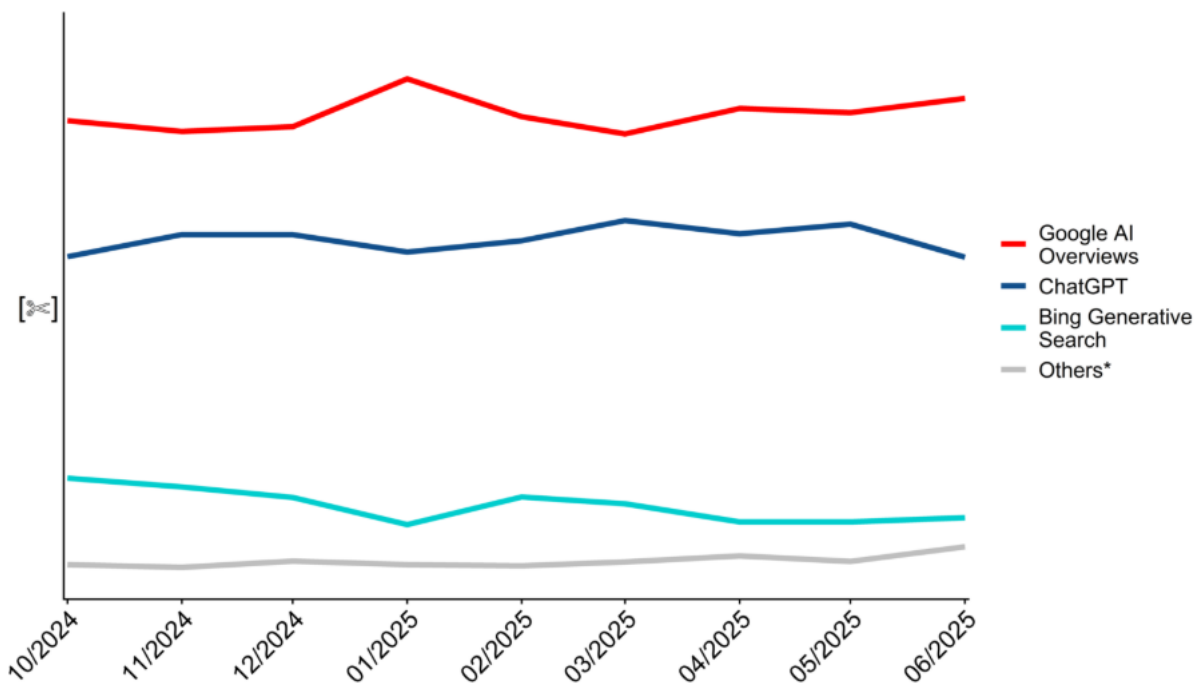
³⁰⁹ Albeit we note that the share of such queries is likely to increase over time as providers attempt to ground more responses using search infrastructure. For example, the proportion of queries received by ChatGPT that generate an answer grounded in search infrastructure was [5-10]% in June 2025, up from just [1-2]% in September 2024. See OpenAI's follow up response to the CMA's RFI.

³¹⁰ Perplexity's response to the CMA's RFI.

³¹¹ Meta's response to the CMA's RFI.

5.31 Finally, another way users engage with generative AI is when Google (as AI Overviews) and Microsoft (as Bing Generative Search) display AI summaries in response to certain queries on their SERPs. Figure 5.4 shows that Google's AI Overviews are shown in response to more queries than the total number of queries (ie regardless of use case) that ChatGPT receives.^{312, 313}

Figure 5.4 Share of queries for traditional general search engines including AI summaries and AI assistants in the UK (October 2024 – June 2025)



Source: CMA analysis of parties' data

*Others include: Gemini, Copilot, and Meta AI and Perplexity. We have excluded Claude.ai and [redacted] as these suppliers have stated that they do not compete with Google's general search products.³¹⁴ [redacted].

Competition from Bing and other traditional general search providers

5.32 As set out above, Google submitted that other traditional general search providers are the most direct competitors to Google's general search products, with Bing being its main rival in the UK.³¹⁵

³¹² The figures for AI summaries are not included in 'AI Assistants' in Figures 5.2 or 5.3. This would result in double counting of the total queries as these AI summaries must be shown in response to either a Google Search or Bing query.

³¹³ See [redacted] responses to the CMA's RFI.

³¹⁴ Anthropic's submission to the CMA. Anthropic's response to the CMA's RFI; [redacted] response to the CMA's RFI.

³¹⁵ Google's consolidated response to the CMA's RFI.

- 5.33 Google’s internal documents discussing its competitors in general search [REDACTED].^{316, 317} Furthermore, Google’s latest US Information Satisfaction tests, carried out throughout 2024 and 2025, involved comparisons with Bing’s search results [REDACTED].^{318, 319}
- 5.34 Another document also shows that consumers have much greater awareness of Google than other traditional general search providers. A 2023 Google study found that [REDACTED].^{320, 321} The significantly greater consumer awareness of Google is reflected in the common use of ‘*to google*’³²² and the observation during the US DoJ Search Litigation that ‘*Google.com*’ is one of the most common queries on Bing.³²³
- 5.35 Several other traditional general search providers identified Google as their main competitor or as one of their two main competitors alongside Bing.³²⁴ Microsoft submitted that ‘by far’ Bing’s main competitor for general search is Google and that [REDACTED].³²⁵ This is consistent with Microsoft’s internal documents, most of which only discuss Google as its main competitor.³²⁶
- 5.36 Bing is the only other English-language traditional general search provider which has developed and maintains search infrastructure at scale. Almost all other traditional general search providers rely on syndication agreements to present organic results and/or advertisements.³²⁷ [REDACTED].^{328, 329} [REDACTED].³³⁰ Such factors are likely to limit the ability of other traditional general search providers to compete effectively with Google and their ability to significantly expand their user numbers.
- 5.37 Of the traditional search engines that rely on organic syndication to provide general search results, most currently use Bing’s syndication products rather than Google’s. However, the overall share of general search queries accounted for by

³¹⁶ Google’s internal documents. Of the [REDACTED] documents Google submitted related to competition on the user-side, [REDACTED].
³¹⁷ [REDACTED].

³¹⁸ Google’s consolidated response to the CMA’s RFI.

³¹⁹ Google’s consolidated response to the CMA’s RFI.

³²⁰ Google’s internal document.

³²¹ [REDACTED]. Google’s internal document.

³²² See for example Wikipedia, ‘Google (verb)’, accessed by the CMA on 1 May 2025 [Google \(verb\) - Wikipedia](#).

³²³ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, paragraph 132.

³²⁴ [REDACTED] response to the CMA’s RFI; [REDACTED] response to the CMA’s RFI; [REDACTED] response to the CMA’s RFI; [REDACTED] response to the CMA’s RFI.

³²⁵ Microsoft’s response to the CMA’s RFI.

³²⁶ Microsoft submitted [REDACTED] internal documents. Of these, [REDACTED] documents discussed Google, while [REDACTED] discussed other general search providers. Some key examples include: Microsoft’s internal document, [REDACTED] and Microsoft’s internal document, [REDACTED].

³²⁷ For example, Brave and Mojeek do not syndicate results from Google or Microsoft Bing but use their own search infrastructure to show results to users. See paragraphs 5.208-5.216 below for a discussion of how Google’s search infrastructure compares with those of other traditional search providers and AI assistants. Brave’s response to the CMA’s RFI; Mojeek’s response to the CMA’s RFI.

³²⁸ [REDACTED] said Google does not license organic web links for mobile devices in their response to the CMA’s RFI; and [REDACTED].

³²⁹ [REDACTED].

³³⁰ [REDACTED] said Microsoft determines the ranking of their search results and ads in their response to the CMA’s RFI; [REDACTED].

syndication partners is very small (less than [0-5]%), and the combined share of Bing and its syndication partners is less than [5-10]%.³³¹

- 5.38 The above evidence is consistent with other traditional general search providers being a limited alternative to Google. In line with this, the US DoJ Search Litigation referred to evidence from a 2020 Google quality degradation study, showing that Google would not lose significant search revenue if it were to significantly reduce the quality of Google's general search products.³³² The importance of Google as a traditional general search provider is consistent with comments from several [REDACTED] specialised search providers that said they focus their efforts on optimising for discoverability on Google Search (albeit the process for other traditional general search providers is largely the same),³³³ and some [REDACTED] said that they do not expect Bing's attractiveness as an alternative to Google's general search products to change in the next five years.³³⁴

Generative AI and traditional general search providers

- 5.39 As noted at paragraph 5.19, Google submitted that generative AI is the development with potential to lead to the most significant change over the next five years. We have therefore assessed whether and how any expected or foreseeable developments in relation to generative AI are likely to affect Google's position in general search (we have considered the impact of AI assistants such as ChatGPT separately below).
- 5.40 Google's internal documents indicate that [REDACTED] of Google's strategy [REDACTED]. For example:
- (a) A 2024 document providing an update to the Board of Directors describes the Search vision as: '[REDACTED]'.³³⁵
 - (b) Another internal document discussing Google's strategy for 2025-2027 talks about its plan to '[REDACTED]'.³³⁶ To achieve this strategy, the document discusses, among other steps, [REDACTED].³³⁷
 - (c) The same document discusses [REDACTED].³³⁸

³³¹ DuckDuckGo and Yahoo syndicate Bing organic search results. See [REDACTED] responses to the CMA's RFI. See [REDACTED] response to the CMA's RFI. See [REDACTED] response to the CMA's RFI.

³³² *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, paragraph 134. [pr24-59-Google.pdf](#).

³³³ See [REDACTED] responses to the CMA's RFI from [REDACTED]; See [REDACTED] response to the CMA's RFI.

³³⁴ See responses to the CMAs RFI from [REDACTED] and response to the CMA's RFI.

³³⁵ Google's internal document.

³³⁶ Google's internal document.

³³⁷ Google's internal document.

³³⁸ Google's internal document.

- 5.41 Some [redacted] [redacted] traditional general search providers indicated that they intend to use generative AI to improve their products and compete with Google.³³⁹ [redacted], Microsoft said that [redacted]³⁴⁰ and this is also reflected in Microsoft's internal documents, [redacted].³⁴¹
- 5.42 However, the incorporation of generative AI into the products of traditional general search providers has not yet affected Google's position in general search, as shown by the share of queries analysis above. In this context, the evidence does not indicate that the use of generative AI by other traditional general search providers is a significant risk to Google's current position in general search. [redacted] Google's internal documents [redacted] and Microsoft said that its experience with Bing (and Copilot) demonstrates [redacted].³⁴² There is no evidence to suggest that generative AI will significantly affect the barriers (see paragraphs 5.160 to 5.226) traditional general search providers face in competing with Google. For example, at this stage no evidence suggests generative AI will affect Google's wider ecosystem of products which give Google influence over access points to general search (eg Android and Chrome) and provide Google with access to data which may not be available to others.
- 5.43 Overall, the evidence indicates that, amongst traditional general search providers, Bing is the best alternative to Google in general search. However, the evidence described above indicates that it is a limited alternative to Google's general search products and this has been the case for a number of years. Microsoft is incorporating generative AI into its search product but at this stage the evidence does not indicate that this is likely to significantly affect competition between Google and Bing in general search. Other traditional general search providers are much smaller than Bing (and Google). These smaller providers have not expanded their share of queries over a significant number of years and almost all of them depend on syndication agreements from Bing and Google which is likely to limit their ability to compete effectively with Google.

Competition from AI assistants

- 5.44 In addition to the incorporation of generative AI into traditional general search products discussed above, developments in generative AI have provided new ways for users to interact with products and have led to the emergence of AI assistants which have a range of use cases including some that have to date been fulfilled by traditional general search providers.

³³⁹ [redacted] response to the CMA's RFI and [redacted] response to the CMA's RFI.

³⁴⁰ Microsoft's response to the CMA's RFI.

³⁴¹ For example, Microsoft's internal document, [redacted]. Microsoft's internal document, [redacted]. Microsoft's internal document, [redacted].

³⁴² Microsoft's response to the CMA's RFI.

- 5.45 Overall usage of AI assistants, and especially ChatGPT, has grown very quickly. For example, ChatGPT was reported to have reached over 100 million users weeks after its launch and over 500 million users within 2 years of its launch^{343, 344} and in June 2025 the total volume of queries (across all use cases) received by ChatGPT in the UK was almost [1-2] billion.³⁴⁵
- 5.46 Although AI assistants have a variety of use cases and usage of AI assistants for search-grounded AI queries³⁴⁶ is still low compared to use of Google Search (see paragraphs 5.29 and 5.30), they are an emerging competitive threat to Google's general search. For example, Apple's senior vice president of services (while testifying in the US DoJ Search Litigation) linked a decline in queries to Google through Apple's Safari browser to growth in the use of AI assistants.³⁴⁷ Google has also introduced features, most obviously AI Overviews and AI Mode, to general search that appear likely to be a response to the competitive threat from AI assistants.³⁴⁸
- 5.47 Amongst providers of AI assistants, OpenAI and Perplexity said that they compete with Google's general search products,³⁴⁹ while Anthropic, Mistral and [REDACTED] submitted that they do not compete with Google's general search products.³⁵⁰ These submissions are consistent with [REDACTED] and internal documents provided by OpenAI and Perplexity.³⁵¹ Therefore, in this section we present evidence from Google's and third parties' internal documents and consumer research relating to AI assistants, particularly ChatGPT and Perplexity.

Google's internal documents

- 5.48 Google's internal documents show that Google monitors AI assistants and their potential impact on general search, particularly [REDACTED]. Of the [REDACTED]³⁵² internal documents it submitted covering a period of two and a half years (July 2022 to January 2025) which discuss its competitors in search: about half [REDACTED]³⁵³

³⁴³ Reuters, 'ChatGPT sets record for fastest growing user-base', dated 2 February 2023, accessed by the CMA on 11 June 2025, [ChatGPT sets record for fastest-growing user base - analyst note | Reuters](#).

³⁴⁴ Forbes, 'ChatGPT Hits 1 Billion Users? 'Doubled In Just Weeks' Says OpenAI CEO', dated 12 April 2025, accessed by the CMA on 11 June 2025, [ChatGPT Hits 1 Billion Users? 'Doubled In Just Weeks' Says OpenAI CEO](#). [REDACTED].

³⁴⁵ OpenAI's response to the CMA's RFI.

³⁴⁶ As noted at paragraph 5.29, we consider these queries are more likely to reflect the subset of queries where an AI assistant is being used as an alternative to Google Search.

³⁴⁷ The Verge, 'Google searches are falling in Safari for the first time ever — probably because of AI', dated 7 May 2025, accessed by the CMA on 11 June 2025, [Google searches are falling in Safari for the first time ever — probably because of AI | The Verge](#).

³⁴⁸ A Microsoft document also recognises the competitive threat to Google stating that '[REDACTED]', Microsoft's internal document, [REDACTED].

³⁴⁹ OpenAI's response to the CMA's RFI and Perplexity's response to the CMA's RFI.

³⁵⁰ Anthropic's submission to the CMA. Anthropic's response to the CMA's RFI; Mistral's response to the CMA's RFI; [REDACTED] response to the CMA's RFI.

³⁵¹ OpenAI's internal document, [REDACTED]. Perplexity's internal document, [REDACTED]. Perplexity's internal document, [REDACTED].

³⁵² Google's internal documents.

³⁵³ Google's internal documents.

mentioned [X] (which was also discussed in a document discussing Google's strategy), followed by [X][X],³⁵⁴ [X][X],³⁵⁵ and [X][X].^{356, 357}

5.49 These documents indicate that Google perceives AI assistants and in particular [X] as a competitive threat to its general search products.³⁵⁸ For example, one [X] study³⁵⁹ conducted in the third quarter of 2024 to understand user sentiment for Google and competitors says that '[X]'.^{360, 361}

5.50 However, Google's internal documents also indicate that [X] and that [X]. For example:

(a) Another [X] study from July 2024 conducted on users in the [X] and titled '[X]' sets out that [X].³⁶² It goes on to say that [X].^{363, 364}

(b) A Google document from May 2024 states: [X].³⁶⁵ The document says that [X].³⁶⁶ On broader impact, the document sets out that [X].³⁶⁷

5.51 Google's internal documents also indicate that [X].^{368, 369}

5.52 Although Google has introduced its own AI assistant, Gemini, use of which is also growing quickly, it is currently little used in comparison to traditional means of using Google's general search products and in comparison to ChatGPT. For example, queries to Gemini AI assistant in June 2025 were only [less than 1]% of all queries to Google's general search, in relation to non-business users.^{370, 371} Google's internal documents and its public announcements indicate that, alongside developing the Gemini AI assistant, an important element of its strategy is to incorporate generative AI into its traditional general search products, eg

³⁵⁴ Google's internal documents.

³⁵⁵ Google's internal documents.

³⁵⁶ Google's internal documents.

³⁵⁷ As part of these, Google submitted four [X] studies carried out in 2024, aimed at understanding user sentiment for Google and competitors [X]. Some other AI Assistants were mentioned in Google's Internal Documents much less frequently. For instance, [X], [X], were mentioned once. Google's internal documents; as was [X], Google's internal documents.

³⁵⁸ This is consistent with the testimony of Eddy Cue, Apple's senior Vice President of Services, who said that 'Prior to AI...none of the others were valid choices. I think today there is much greater potential because there are new entrants attacking the problem in a different way.' [Google shares slide as Apple explores AI-powered search alternatives](#).

³⁵⁹ The CMA understands that [X] studies are a series of internal studies undertaken by Google.

³⁶⁰ Typically interpreted as those under the age of 25.

³⁶¹ Google's internal document.

³⁶² Google's internal document.

³⁶³ Google's internal document.

³⁶⁴ We consider this document also at paragraph 4.84(a).

³⁶⁵ Google's internal document.

³⁶⁶ Google's internal document.

³⁶⁷ Google's internal document.

³⁶⁸ For example, Google's internal document; Google's internal document. We consider this document previously at paragraph 4.84(b).

³⁶⁹ The consumer survey also found that use of AI assistants was greatest amongst 16-24 year olds. Accent mobile consumer survey research report, chapter 3, p3.

³⁷⁰ Google's response to the CMA's RFI.

³⁷¹ We note that queries made on Google Search and AI assistants may not be directly comparable. Google refers to queries on Gemini as 'prompts' and which it defines as 'a single statement, instruction or question that is given to Gemini Assistant to guide it towards generating a specific response'. Google's consolidated response to the CMA's RFI.

through AI Overviews and AI Mode.³⁷² Google's ability to integrate generative AI into its existing product with its established user base contrasts to competing AI assistants which must encourage users to change their behaviour to switch to their products. For example, as discussed in paragraph 5.31, Google's AI Overviews are shown in response to more queries than the total queries (ie regardless of use case) ChatGPT receives.³⁷³

- 5.53 Overall, Google's internal documents indicate that it is monitoring the competitive threat from AI assistants and in particular from [REDACTED]. However, those documents do not indicate that at this stage Google considers that AI assistants will substantially disrupt Google's position in general search in the next five years.

Evidence from consumer research and survey

- 5.54 As described at paragraph 2.42(d), we commissioned a survey of smartphone owners and qualitative research of AI assistant users to understand how consumers use AI assistants for search-related use cases. The results of these two pieces of research are consistent with our analysis of query volumes and evidence from Google's internal documents. They show that:
- (a) Usage of AI assistants is currently very low compared to Google Search. The consumer survey results show that a low proportion (17%) of people would 'most often' use an AI assistant for any of the four use cases we asked them about, while the equivalent figure for traditional general search providers was 97%.³⁷⁴ The qualitative consumer research found that despite a trend of increasing usage of AI assistants among participants, the participants also reported using general search engines more frequently than AI assistants.³⁷⁵
 - (b) The consumer survey showed that ChatGPT is the most used AI assistant, with around three quarters of respondents who used an AI assistant using ChatGPT,³⁷⁶ [REDACTED].³⁷⁷ Participants in the consumer research generally claimed to have heard about ChatGPT first and, as a result, ChatGPT was most often top of mind when thinking about AI assistants.³⁷⁸

³⁷² For example, Google formally launched AI Mode in the US on 20th May 2025 – [AI Mode in Google Search: Updates from Google I/O 2025](#). Also see: Google's internal document; Google's internal document.

³⁷³ Another recent example is the incorporation of Gemini and AI Mode into Chrome – [Gemini in Chrome | The next generation of AI in Chrome | Chrome](#).

³⁷⁴ Accent mobile consumer survey data tables, tables DVany, DVanySE. The consumer survey asked respondents about four search 'use cases': i) search for a specific website; ii) search the web for a product that you want to buy; iii) search the web for simple information; iv) search the web for less simple information.

³⁷⁵ Thinks Insight & Strategy qualitative consumer research report, paragraph 1.8, 3.6, 4.7.

³⁷⁶ The quantitative survey indicated that around three-quarters (77%) of people who use AI assistants for any purpose (ie not just for search-related use cases) reported using ChatGPT, followed by Gemini and Microsoft Copilot which are each used by almost a quarter of respondents (25%). Accent mobile consumer survey research report, Figure 1, p4.

³⁷⁷ [REDACTED].

³⁷⁸ Thinks Insight & Strategy qualitative consumer research report, paragraphs 3.3, 3.8.

- (c) Consumers use AI assistants for some ‘search-like’ tasks, but usage varies by use case. The consumer survey results show that consumers are more likely to use an AI assistant when searching for ‘less simple information’ than for the other search tasks we tested.³⁷⁹ This is consistent with the consumer research where participants typically opted to use AI assistants for tasks perceived as ‘difficult’ or ‘complex’.³⁸⁰ As outlined in paragraph 5.49 above, Google’s internal research [X] found that [X].³⁸¹

5.55 The qualitative research with AI assistant users also points to other factors which in aggregate suggest that use of AI assistants will increase in the future, but that traditional general search providers will likely continue to be used for a broad range of use cases:

- (a) The research found that habit and experience were one of the drivers of AI users’ choice of tool: an increase in use may therefore lead to further increases in use of AI assistants over time.³⁸² Since currently around 40% of consumers use AI assistants, this increase could be substantial.³⁸³
- (b) However, even within ‘search’ tasks, users often have needs that are not satisfied by AI assistants. These include confirming that the output is true or reliable due to a lack of confidence in the AI output, and conducting a follow-up task such as navigating to a website to take action. Consumers often used traditional general search providers for these tasks.³⁸⁴
- (c) For more complex search needs, consumers sometimes use AI assistants in combination with traditional general search providers to get the perceived benefits of both.³⁸⁵

5.56 Overall, the consumer research evidence indicates that consumers use AI assistants in general for a range of use cases, including to find information that they have historically found through traditional general search providers. However, their usage is currently low compared to use of Google’s general search products, and although there is scope for this to increase in the future, AI assistants are likely to continue being used in tandem with traditional general search providers for some time.

³⁷⁹ 17% of respondents reported using these tools ‘frequently’ or ‘most often’ for this use case. For other use cases the proportion of consumers who use AI assistants ‘frequently’ or ‘most often’ is between 5% and 9%. Accent mobile consumer survey data tables, table DV43r1-DV43r4.

³⁸⁰ Thinks Insight & Strategy qualitative consumer research report, paragraphs 1.10, 4.4, 4.8, 4.23.

³⁸¹ Google’s internal document; Google’s internal document.

³⁸² Thinks Insight & Strategy qualitative consumer research report, paragraphs 4.3, 4.14-4.16.

³⁸³ Accent mobile consumer survey research report, chapter 3, p3.

³⁸⁴ Thinks Insight & Strategy qualitative consumer research report, paragraphs 4.5, 4.26-4.28.

³⁸⁵ Thinks Insight & Strategy qualitative consumer research report, paragraphs 4.24, 4.25.

Evidence from third parties

- 5.57 Both ChatGPT, which draws on its own and others' search infrastructure,³⁸⁶ and Perplexity, which solely draws on its own search infrastructure,³⁸⁷ said they compete with Google's general search products.³⁸⁸ In contrast, other providers (Anthropic, Mistral and [REDACTED]) do not consider that they compete with Google's general search products³⁸⁹ and [REDACTED].
- 5.58 In particular, OpenAI, developer of ChatGPT, has a strategy and ambition to compete directly with [REDACTED] general search products. For example:
- (a) One OpenAI document dated June 2024 is titled 'Why are we solving "Search"?' and sets out that 'there's opportunity to give 1B+ users a better Search experience' and that although 'the challenge is that Search covers a broad range of user needs', ChatGPT has 'already expanded what is possible for parts of Search, [REDACTED]'. A slide titled 'our competitors are also working on better Search with LLMs' [REDACTED].³⁹⁰
 - (b) Another OpenAI document [REDACTED] sets out that [REDACTED] the intent is to [REDACTED].³⁹¹
- 5.59 We also note that the proportion of queries received by ChatGPT that generate an answer grounded in search infrastructure has increased, from [1-2]% in September 2024 to [5-10]% in June 2025.³⁹² We consider this increase consistent with OpenAI's broader strategy to compete with [REDACTED] general search products, as detailed in the documents above.
- 5.60 Perplexity's internal documents [REDACTED] support their submission above that they consider themselves a competitor to Google's general search products. For example:
- (a) A company memo for investors (date is unknown) states that 'Google (Search, Gemini, Search Generative Experience) and OpenAI (ChatGPT with Bing browsing) are the competitors to Perplexity's product'. It states that [REDACTED] and sets out that [REDACTED] but is instead about [REDACTED].³⁹³
 - (b) Another undated document says that 'the era has been defined by "search" engines, [REDACTED]'.³⁹⁴

³⁸⁶ OpenAI's response to the CMA's RFI.

³⁸⁷ Perplexity's response to the CMA's RFI.

³⁸⁸ OpenAI's response to the CMA's RFI; Perplexity's response to the CMA's RFI.

³⁸⁹ Anthropic's submission to the CMA. Anthropic's response to the CMA's RFI; Mistral's response to the CMA's RFI; [REDACTED] response to the CMA's RFI.

³⁹⁰ OpenAI's internal document.

³⁹¹ OpenAI's internal document.

³⁹² OpenAI's follow up response to the CMA's RFI.

³⁹³ Perplexity's internal document.

³⁹⁴ Perplexity's internal document.

Google's response to our Proposed Decision

- 5.61 As noted in paragraph 5.22, Google submitted that the Proposed Decision made an incomplete assessment of AI assistants.³⁹⁵ Google highlighted the strong growth of AI assistants and the funding they have received, stating that the Proposed Decision neglected to analyse relevant evidence including 'forward-looking projections'.^{396, 397}
- 5.62 We do not agree with this submission. In particular:
- (a) The Proposed Decision considered the strong growth of AI assistants to date, and we have presented an updated analysis above;
 - (b) We recognise that AI assistants have received significant funding. However, Google cited several examples (eg Mistral and Genspark) where the evidence does not show that these firms are seeking to compete with Google's general search. Some of Google's examples included firms who are developing a product which is an emerging competitive threat to Google's general search (eg OpenAI). However, given the wide range of use cases for these AI assistants, it is unclear what conclusion to draw at this stage from the observation that these firms have received significant funding beyond the observation made above that some of these providers are developing products that are an emerging competitive threat to Google's general search services.
 - (c) Finally, the Proposed Decision did consider 'forward-looking projections', for example through the consideration of Google's and third party internal documents. We have also reviewed additional third party investor reports. These reports are consistent with the view that AI developments may disrupt Google's position in general search services, although their development is uncertain and Google is responding to this competitive threat. Of the 11 reports we reviewed, seven suggest Google is well-placed to respond to the emerging threat posed by AI assistants. Furthermore, six of the reports suggest effective monetization strategies (considered further at paragraphs 5.145 to 5.153) have not yet been developed for AI assistants, and that this creates uncertainty around their potential future performance.³⁹⁸

³⁹⁵ Google's written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 34. [Google.pdf](#).

³⁹⁶ As set out in paragraph 5.22, Google stated the Proposed Decision should have analysed 'overall market trends, forward-looking projections, share price development, investment levels in R&D, and the history of innovation'.

³⁹⁷ Google's written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraphs 36 and 38. [Google.pdf](#).

³⁹⁸ Specifically, we reviewed a selection of third party investor reports published between May and August 2025 that considered Google or AI assistants. We produced this selection by searching for recent investor reports on the Refinitiv platform. This involved searching for investor reports focusing on Google and keywords such as 'AI Assistant', 'AI Interface', 'ChatGPT', 'OpenAI', 'Perplexity', and 'MetaAI'. We downloaded and reviewed pages from the resulting reports that contained the most instances of our key search terms.

Summary of evidence on competition from AI assistants

- 5.63 Use of AI assistants, especially ChatGPT, has grown rapidly. Some AI assistants, including ChatGPT, have a strategy to compete with [X] general search products. There is evidence that some users are using AI assistants rather than Google's general search and Google [X] has responded to this competitive threat (eg through the introduction of generative AI into its general search products).
- 5.64 However, AI assistants have a wide range of possible use cases and use of AI assistants (and especially AI assistants other than ChatGPT) for search-grounded AI queries is, at this stage, low compared to use of Google's general search products. Although the proportion of ChatGPT's total queries that produce answers grounded in search infrastructure has increased in recent months, it remains less than 10% of the total queries received by ChatGPT.³⁹⁹
- 5.65 Therefore, although some AI assistants are an emerging competitive threat to Google's general search products, given the early stage in the development of these products, there is significant uncertainty regarding how use of these products will evolve and whether they will become a sustained and significant competitive threat to Google's general search products.⁴⁰⁰ This is particularly so given the barriers to entry and expansion they face, as described at paragraph 5.225 below.
- 5.66 Indeed, developments in generative AI could also strengthen Google's position in general search as Google is well-positioned to respond to the emerging competitive threat from AI assistants in general search and more generally embed generative AI into its products. This contrasts with AI assistants which must encourage users to switch to their products. For example, as shown in Figure 5.4, AI Overviews are shown in response to more queries than the total number of queries received by ChatGPT in the UK,⁴⁰¹ and Google recently launched a new AI Mode in the UK.⁴⁰² Google has also developed Gemini AI assistant which could compete more directly with AI assistants such as ChatGPT, if substantial numbers of users were to begin to use AI assistants for general search use cases. The uncertainty regarding the future development of AI assistants, as well as Google's ability to respond to their development, is also reflected in third party investor reports.
- 5.67 On this basis, we consider that, while AI assistants are an emerging competitive threat to Google's general search products, currently they are a limited alternative

³⁹⁹ OpenAI's follow up response to the CMA's RFI.

⁴⁰⁰ This is consistent with Google's submissions that generative AI 'is a nascent space at an early stage of development and adoption'. Google response to the CMA's RFI.

⁴⁰¹ And as noted, this includes all queries to ChatGPT in the UK regardless of use case. OpenAI's response to the CMA's RFI. Google's response to the CMA's RFI.

⁴⁰² Google, 'Google Search: Introducing AI Mode in the UK', 28 July 2025, accessed by CMA on 9 September 2025. [AI Mode now available on Google Search in the UK](#).

to Google's general search products and it is unclear whether they will substantially disrupt Google's position in general search in the next five years and become a more sustained and significant competitive threat to Google's general search.

- 5.68 We note that these conclusions are consistent with the findings of the US District Court in the US DoJ Search Litigation that whilst generative AI products 'may yet prove to be game changers', they are 'not yet close to replacing traditional [general search engines]', where Google remains the dominant firm.⁴⁰³

Competition from specialised search providers

- 5.69 While Google is by far the most-used traditional general search provider in the UK, there are also specialised search providers (eg Skyscanner, Booking.com and Amazon) which allow users to search for, compare and purchase products or services in a particular sector. We have therefore assessed the extent to which these providers are an alternative to Google's general search products.
- 5.70 Specialised search providers have important functional differences to general search providers such as Google.⁴⁰⁴ By definition, specialised search providers focus on specific sectors or 'verticals' such as flights, hotels and shopping. They respond to queries using data that has been provided to them, and they do not search for information generally on the world wide web. In contrast, Google's general search products respond to a wide range of queries by providing organic links from the world wide web alongside other information.
- 5.71 These functional differences are reflected in differences in the responses general and specialised search providers present to queries. For example, the Amazon response to the query 'Europe' focuses on products that can be purchased (eg travel books).⁴⁰⁵ The Google response to the same query provides a range of information, including links to sources such as Wikipedia and the latest news.⁴⁰⁶
- 5.72 These differences mean that, if specialised search providers were to exercise a material competitive constraint on Google's general search products, this would be in aggregate, since each specialised search provider could be an alternative only in a specific sector.

⁴⁰³ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 2 September 2025, paragraphs 63-66 and pages 1-2.

⁴⁰⁴ The CMA also noted these differences in the [Online Platforms and Digital Advertising Market Study](#), July 2020 (DAMS), paragraph 3.46.

⁴⁰⁵ See example Amazon.co.uk search for 'Europe': [Amazon.co.uk : europe](#).

⁴⁰⁶ See example Google.com search for 'Europe': [europe - Google Search](#).

- 5.73 There is evidence of some competition between Google’s general search and specialised search providers in the specific verticals in which those specialised search providers compete:
- (a) Google has developed several of its own specialised search products and presents results from these on the SERP in response to relevant queries.
 - (b) Many [X] specialised search providers also reported that they compete with Google to attract users for their specific query segment.⁴⁰⁷
 - (c) In the consumer survey 39% of respondents said that they used a shopping website or app (ie a form of specialised search) when searching the web for a product to buy.⁴⁰⁸
- 5.74 However, the overall evidence shows that specialised search providers are a weak competitive constraint on Google’s general search products both in isolation and in aggregate.
- 5.75 First, the intrinsic functional differences between Google’s general search products and specialised search providers described above limit the nature of the constraint that specialised search providers exert on Google’s general search products. Google attracts users to its general search products on the premise that it can meaningfully respond to a broad range of queries. In contrast, specialised search providers focus on a more specific purpose (eg a particular purchase). The ability to reliably respond to a broad range of queries is one reason users are attracted to Google⁴⁰⁹ – including as a means of accessing specialised search providers and for navigational queries where a user may have been able to navigate to the desired website fairly easily. This fundamental difference between Google’s general search products and specialised search providers is reflected in the following:
- (a) The consumer survey found that a majority of consumers ‘most often’ use traditional general search providers for all four of the use cases they were asked about, including the task of searching the web for a product to buy.⁴¹⁰
 - (b) There are a significant number of circumstances in which there is no specialised search provider which could usefully respond to an important

⁴⁰⁷ See [X] responses to the CMA’s RFI.

⁴⁰⁸ Accent mobile consumer survey research report, Figure 2. Accent mobile consumer survey research report, Figure 2.

⁴⁰⁹ In this respect the liability judgment in the US DoJ Search Litigation noted that ‘the GSE [General Search Engine] is performing a unique function: It is both a reservoir of information and a conduit to other sources on the web. And it serves that purpose over and over again. No SVP [specialised search provider] or social media platform can meet user needs in the same way. They therefore are not functionally interchangeable with GSEs.’ See: *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, pages 143 and 144. [pr24-59-Google.pdf](#).

⁴¹⁰ Although 39% of respondents said that they used a shopping website or app when searching for a product to buy, this was less than the 54% who selected a traditional search provider. Accent mobile consumer survey research report, Figure 2. Accent mobile consumer survey research report, Figure 2.

subset of queries. For example, there is no specialised search provider who can respond to navigational (ie locating websites) queries.

- (c) Specialised search providers are not offered as an option on search engine default choice screens and only a narrow set of specialised search providers can be set as a default search option from the URL bar on a limited number of smaller browsers.⁴¹¹ Notably Google does not offer any specialised search providers as a default option in its Chrome browser.⁴¹²
- (d) Google's distribution agreements with original equipment manufacturers (**OEMs**) contain restrictions on the installation, placement and/or promotion of 'alternative search services' which are typically defined as any service that is 'substantially similar' to Google.⁴¹³ In one case [X].⁴¹⁴ As a result, we understand that that whilst these agreements restrict the installation, placement and promotion of products such as Bing, the same restrictions do not apply to specialised search providers.

5.76 Second, Google is an important source of traffic for specialised search providers. Specialised search providers we contacted received on average [30-40]% of their traffic in 2024 from Google's general search products.⁴¹⁵ This relationship means that changes to Google's SERP can significantly affect the traffic to specialised search providers.⁴¹⁶ For example, Skyscanner reported that in 2024 it received a lower share of its user traffic from Google's organic search results which it attributed to a number of changes made by Google.⁴¹⁷

5.77 In line with the above, the US DoJ Search Litigation referred to evidence from Google that the use of specialised search providers is complementary to Google rather than substitutable. For instance, a 2019 Google study found that users who were engaged with specialised search providers (such as being Amazon Prime members) were more likely to enter queries into Google.⁴¹⁸

5.78 Third, Google's internal documents [X] Google's internal documents⁴¹⁹ and Amazon said that it competes with Google as it aims to 'attract consumers [X] and compete for customers' attention [X]'.⁴²⁰

⁴¹¹ Mozilla submitted that users can set eBay and Wikipedia as pre-installed defaults in the Firefox URL bar. Opera browser enables users to set Amazon and Wikipedia as defaults. Firefox's response to the CMA's RFI. Mozilla's submission to the CMA; Opera's response to the CMA's RFI.

⁴¹² Google's consolidated response to the CMA's RFI.

⁴¹³ Google's response to the CMA's RFI.

⁴¹⁴ Google's response to the CMA's RFI.

⁴¹⁵ CMA analysis of parties' data. The largest share of traffic from Google being [90-100]% and the smallest [0-10]%.

⁴¹⁶ See responses to the CMA's RFI; response to the CMA's RFI.

⁴¹⁷ Skyscanner's response to the CMA's RFI.

⁴¹⁸ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, paragraph 157. [pr24-59-Google.pdf](#).

⁴¹⁹ Google's internal documents.

⁴²⁰ Amazon's response to the CMA's RFI.

- 5.79 [X] Google's internal documents discussing competitors [X]⁴²¹ and these documents indicate that any competitive constraint from [X] for users is [X].⁴²² For example:
- (a) A 2024 study indicates that there is [X] overlap in the top user needs for Google Search and [X]: while the top three user needs on [X] are to [X], the equivalent on Google Search are to [X].⁴²³
 - (b) Another document from 2020, submitted as evidence in the US DoJ Search Litigation, entitled 'Amazon App Usage and Impact', says that 'as expected Amazon users are also more likely to be regular and frequent Google users' and that there is 'no evidence of negative impact on Google.com' from Amazon app adoption.⁴²⁴
- 5.80 Any competitive constraint from Amazon specifically on Google's general search products is [X] likely to be limited because:
- (a) Any competition from Amazon applies to a minority of queries inputted on Google's general search products, namely queries related to categories of products that are available on Amazon Marketplace.
 - (b) Amazon also receives from Google a [X] proportion ([30-40]%) of its traffic and Google accounts for a [X] proportion ([50-60]% of Amazon Marketplace's total) of Amazon's advertising spend.⁴²⁵
- 5.81 Finally, we asked traditional general search providers to describe the changes they currently anticipate occurring over the next five years in relation to their main competitors in general search. None of the respondents specified that they anticipate specialised search providers to grow over this period.⁴²⁶ Furthermore, we have not seen any other evidence (eg in Google's internal documents or from other sources) which suggests otherwise.
- 5.82 Overall, the evidence shows that specialised search providers are a limited alternative to Google's general search products both in isolation and in aggregate. This is due, among other things, to their functional differences and relationship with Google's general search products. [X] specialised search provider [X] in Google's documents and these documents indicate that any competition for users from [X] is [X]. The evidence also does not indicate that specialised search

⁴²¹ [X]: Google internal document; and Google internal document.

⁴²² [X]. Google's internal document.

⁴²³ Google's internal document.

⁴²⁴ Google, 'Amazon App Usage and Impact', published on Antitrust Division, U.S. Department of Justice, dated October 2020, accessed by the CMA on 01 May 2025. [Trial Exhibit - PSX00562: U.S. and Plaintiff States v. Google LLC](#).

⁴²⁵ Amazon's response to the CMA's RFI.

⁴²⁶ See [X] responses to the CMA's RFI. See [X] response to the CMA's RFI.

providers are likely to become a significantly more effective alternative to Google's general search in the next five years.

Competition from social media platforms

- 5.83 In light of Google's submissions (paragraph 5.21), we have assessed whether social media platforms exercise a competitive constraint on Google in general search.
- 5.84 First, while Meta submitted that it competes with a 'wide range of online services, including Google's, to attract users and advertisers to Meta's platforms',⁴²⁷ TikTok submitted that it does not provide a 'meaningful competitive constraint' on Google Search.⁴²⁸
- 5.85 Second, there are some similarities between specialised search providers and social media platforms in terms of the functional differences vis-à-vis Google's general search products. Social media platforms also focus on providing information based on the content provided to them rather than using content from the world wide web. These differences in functionality are reflected in the fact that we are not aware of any browser (including Google Chrome) offering users the ability to select a social media platform as a default.⁴²⁹
- 5.86 Third, Google's internal documents do consider social media platforms but show that, [REDACTED]. For example:
- (a) In the internal documents that consider social media, Google benchmarks consumer awareness and usage of Google Search mostly against [REDACTED] ([REDACTED]), followed by [REDACTED] and to a much more limited extent [REDACTED], [REDACTED] and [REDACTED].⁴³⁰
 - (b) Google's internal documents indicate that Google's general search products and social media platforms generally [REDACTED]. For instance, a 2024 [REDACTED] study assessing user sentiment on Google and its competitors found that [REDACTED].⁴³¹
⁴³² Further, a '[REDACTED]' document containing results of a survey from February 2024 indicates that Google Search was [REDACTED].^{433, 434}

⁴²⁷ Meta's response to the CMA's RFI.

⁴²⁸ TikTok's response to the CMA's RFI.

⁴²⁹ Responses to CMA's RFI.

⁴³⁰ Google's internal documents.

⁴³¹ [REDACTED] was designed to understand how users use and perceive Search and competing platforms. See: Google's internal document.

⁴³² Google's internal document.

⁴³³ Information use cases included tasks such as getting a quick fact or fixing a problem.

⁴³⁴ Google's internal document.

(c) Google's internal documents also indicate that [REDACTED].⁴³⁵ For example, a document setting out the results of Google's [REDACTED] study from July 2024 found that for [REDACTED],⁴³⁶ [REDACTED].⁴³⁷ Further, Google's '[REDACTED]' document sets out how '[REDACTED]'⁴³⁸ [REDACTED].'⁴³⁹ Part of Google's [REDACTED] is built around trying to meet these needs. For instance, Google set out how it plans to [REDACTED].⁴⁴⁰

5.87 Finally, we asked traditional general search providers to describe the changes they currently anticipate occurring over the next five years in relation to their main competitors in general search. Almost none [REDACTED] of the respondents specified in their response that they anticipate social media platforms to grow as a competitive constraint over this period.⁴⁴¹

5.88 Overall, the evidence shows that social media platforms are not an effective alternative to Google in general search. The evidence also does not indicate that the competitive constraint that social media platforms exercise on Google's general search is likely to significantly change in the next five years.

Competition from other potential alternatives to Google's general search

5.89 It has been reported that [REDACTED]⁴⁴² and Apple⁴⁴³ have been developing elements of AI-powered search. We have therefore assessed the extent to which they are likely to affect Google's position in general search over the next five years.

5.90 Google has evaluated and monitored the potential of Apple entering the search market. For instance, Google's CEO Sundar Pichai has confirmed that Google has discussed this possibility.⁴⁴⁴

5.91 Apple started developing some elements of search infrastructure in 2013, which it uses within its Spotlight⁴⁴⁵ and Apple's Suggestions⁴⁴⁶ features. However, Apple submitted that it 'has not and has never intended to develop a general web search

⁴³⁵ This is consistent with the findings of our qualitative research where younger participants in the research were more likely to report using social media as part of their daily routine and where they might search for information. *Thinks Insight & Strategy* qualitative consumer research report, paragraph 4.19.

⁴³⁶ Such as getting a recommendation or exploring new ideas.

⁴³⁷ Google's internal document.

⁴³⁸ [REDACTED].

⁴³⁹ Google's internal document.

⁴⁴⁰ Google's internal document.

⁴⁴¹ See responses to the CMA's RFI. Only [REDACTED] said social media may provide future competition saying users may utilise social media platforms 'for certain categories of searches'. [REDACTED] response to the CMA's RFI.

⁴⁴² [REDACTED].

⁴⁴³ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, paragraphs 300-311. [pr24-59-Google.pdf](#).

⁴⁴⁴ Google's response to the CMA's RFI.

⁴⁴⁵ Spotlight can be accessed by a downward swipe, presenting a search bar that enables users to search their device and the web. Apple, 'Use Spotlight Search on your iPhone, iPad, or iPod touch', 18 March 2025, accessed by the CMA on 7 May 2025. [Use Spotlight Search on your iPhone, iPad, or iPod touch - Apple Support](#).

⁴⁴⁶ Suggestions, directly navigates users to a third party site, skipping the Google SERP entirely, when users enter a navigational query into, Siri, Spotlight, or Safari. *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, paragraph 303. [pr24-59-Google.pdf](#).

engine function'.⁴⁴⁷ Apple's web-index is a fraction the size of Google's (approximately [REDACTED] billion URLs indexed compared to '100s of billions'). Apple's annual costs associated with its search infrastructure are also significantly smaller (around £[REDACTED] compared to £[REDACTED] billion)⁴⁴⁸ and Apple's [REDACTED] internal documents show [REDACTED] with Google. These observations are consistent with Apple using its search infrastructure in a [REDACTED] way which is not [REDACTED] to Google's general search products.⁴⁴⁹

- 5.92 Additionally, Google currently pays Apple a revenue share for default status on Apple devices. As noted by the judge in the US DoJ Search Litigation, Apple would lose this revenue if it were to introduce a competing product. By Apple's own projections, even in a best-case scenario, it would lose over \$12 billion in revenue during the first five years.⁴⁵⁰
- 5.93 Overall, although Google monitors Apple as a potential competitive threat, at this stage we have not seen evidence that [REDACTED]. We discuss the role of defaults on Apple's devices further in our consideration of barriers to entry and expansion.
- 5.94 Google is also monitoring the developments of [REDACTED]. [REDACTED] is mentioned in [REDACTED]⁴⁵¹ of the [REDACTED]⁴⁵² internal documents submitted by Google related to competition in general search. For example, a document from May 2024 on the impact of LLMs on search notes that '[REDACTED]'.⁴⁵³
- 5.95 [REDACTED].⁴⁵⁴ [REDACTED].⁴⁵⁵ Consistent with this, one [REDACTED] internal document (dated September 2024) states that '[REDACTED]'.⁴⁵⁶ Two other [REDACTED] documents indicate [REDACTED]:
- (a) A document from May 2024 states that [REDACTED].⁴⁵⁷
 - (b) Another document from January 2025 discusses [REDACTED] '[REDACTED]' for 2025 in terms of [REDACTED]. It goes on to say that '[REDACTED]'.⁴⁵⁸

⁴⁴⁷ Apple's response to the CMA's RFI.

⁴⁴⁸ Apple's response to the CMA's RFI. Google submitted that the total cost of operating Search globally in 2024 was approximately £[REDACTED] billion in 2024. Of this we attribute £[REDACTED] billion to the maintenance of their search infrastructure based on the categorisations provided. Google's consolidated response to the CMA's RFI. Note currency conversions made using Bank of England annual average Spot exchange rate, US \$ into Sterling as of 31 December 2024.

⁴⁴⁹ Apple's internal document; Apple's internal document; Apple's internal document; Apple's internal document; Apple's internal document.

⁴⁵⁰ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, pages 241 and 242. [pr24-59-Google.pdf](#).

⁴⁵¹ Google's internal documents.

⁴⁵² Google's internal documents.

⁴⁵³ Google's internal document.

⁴⁵⁴ [REDACTED] response to the CMA's RFI.

⁴⁵⁵ [REDACTED] response to the CMA's RFI.

⁴⁵⁶ [REDACTED] internal document.

⁴⁵⁷ [REDACTED] internal document.

⁴⁵⁸ [REDACTED] internal document.

- 5.96 [X] started [X] and at the end of the year, had [X]. Therefore, [X] (100s of billions). Similarly, [X] investment in [X], which is [X] compared to Google's investments to maintain its search infrastructure (around £[X] billion per year).⁴⁵⁹
- 5.97 [X]. However, use of [X] has, to date, been low compared to use of Google Search. For example, in June 2025, [X] accounted for only [X]% of queries to traditional general search engines and AI assistants.⁴⁶⁰
- 5.98 Therefore, we consider that [X], and it is currently unclear how [X] will develop and whether [X] will become a meaningful alternative to Google's general search products. In particular, at this stage use of [X] is very low compared to use of Google Search.

Summary of evidence on competition in general search

- 5.99 Google has accounted for a share of queries amongst traditional general search providers of over 90% in the UK for at least fifteen years.⁴⁶¹ In this context, significant changes in the competitive dynamics are likely to be needed to eliminate Google's strong and established position in general search. The competitive landscape has been evolving, in particular in the last three years, due to the launch of AI assistants. In order to assess the competitive landscape and understand how this may evolve in the next five years, we have examined current and potential competitive constraints on Google's general search products.
- 5.100 Overall, the evidence shows that Bing is currently the best alternative to Google's general search products amongst traditional general search providers. However, the evidence indicates that it is only a limited alternative to Google and this has been the case for a number of years. Microsoft is incorporating generative AI into its search product but at this stage the evidence does not indicate that this is likely to significantly affect competition between Google and Bing in general search over the next five years. Of the traditional search engines that rely on organic syndication to provide general search results, most currently use Bing's syndication products rather than Google's. However, the overall share of general search queries accounted for by syndication partners is very small (less than [0-5]%).⁴⁶²
- 5.101 Overall use of AI assistants, especially ChatGPT, has grown rapidly. Some users are using AI assistants rather than Google's general search products and

⁴⁵⁹ [X]. Google's consolidated response to the CMA's RFI; Google's consolidated response to the CMA's RFI. Note currency conversions made using Bank of England annual average Spot exchange rate, US \$ into Sterling as of 31 December 2024; [X] response to the CMA's RFI.

⁴⁶⁰ See [X] responses to the CMA's RFI [X]: [X]. See [X] responses to the CMA's RFI.

⁴⁶¹ See paragraph 5.24 for data based on total queries to traditional general search providers since 2018 and [Online platforms and digital advertising market study](#), July 2020 (DAMS), Figure 3.3 for a longer time-series based on page referrals to 2009.

⁴⁶² See paragraph 5.37 above.

ChatGPT and Perplexity in particular have intentions to compete with [X] general search products. Google is [X].

- 5.102 However, AI assistants have a wide range of possible use cases and use of AI assistants (and especially AI assistants other than ChatGPT) for search-grounded AI queries⁴⁶³ is, at this stage, low compared to use of Google's general search.
- 5.103 Therefore, although some AI assistants are an emerging competitive threat to Google's general search products, given the early stage in the development of these products, there is significant uncertainty regarding how use of these products will evolve and whether they will become a sustained and significant competitive threat to Google's general search products.⁴⁶⁴ This is particularly so given the barriers to entry and expansion they face, as described at paragraph 5.225 below.
- 5.104 Indeed, developments in generative AI could also strengthen Google's position in general search as Google is well-positioned to respond to the emerging competitive threat from AI assistants in general search and more generally embed generative AI into its products. For example, AI Overviews are shown in response to more queries than the total number of queries received by ChatGPT in the UK,⁴⁶⁵ and Google recently launched a new AI Mode in the UK.⁴⁶⁶ Google has also developed Gemini AI assistant which could compete more directly with AI assistants such as ChatGPT, if substantial numbers of users were to begin to use AI assistants for general search use cases. The uncertainty regarding the future development of AI assistants, as well as Google's ability to respond to their development, is also reflected in third party investor reports.
- 5.105 The evidence does not, therefore, indicate that any expected or foreseeable developments are likely to be sufficient in scope, timeliness and impact to eliminate Google's market power in general search in the next five years; however, we have considered this further when considering barriers to entry and expansion in general search below.
- 5.106 Similarly, we found that specialised search providers (both in isolation and in aggregate) are a limited alternative and social media platforms are not an effective alternative to Google's general search products. The evidence does not indicate that the competitive constraint that specialised search providers and/or social

⁴⁶³ As outlined at paragraph 5.29 above, we consider that these queries represent use cases for AI assistants that most closely overlap with Google's general search products.

⁴⁶⁴ This is consistent with Google's submissions that generative AI 'is a nascent space at an early stage of development and adoption'. Google response to the CMA's RFI.

⁴⁶⁵ And as noted, this includes all queries to ChatGPT in the UK regardless of use case.

⁴⁶⁶ Google, 'Google Search: Introducing AI Mode in the UK', 28 July 2025, accessed by CMA on 9 September 2025. [AI Mode now available on Google Search in the UK](#).

media platforms exercise on Google's general search is likely to significantly change in the next five years.

- 5.107 Lastly, although Google monitors Apple [X] in relation to its general search products, at this stage the evidence does not indicate that Apple [X] (by comparison to Google). The development of [X] and it is currently unclear how [X] will develop and whether [X] will become a material competitor to Google's general search products.

Competition in search advertising

Introduction and Google's submissions

- 5.108 In this section we summarise the evidence regarding the competition Google faces in search advertising, as well as any expected or foreseeable developments over the next five years. Google's search advertising takes primarily one of two forms:⁴⁶⁷ text advertisements (which resemble organic results but are labelled 'sponsored') and shopping advertisements⁴⁶⁸ (also known as product listing advertisements).⁴⁶⁹ Text adverts can be purchased by any advertiser, while shopping adverts are a type of advert that only 'comparison shopping services' can use.⁴⁷⁰ Comparison shopping services are a type of specialised search provider that 'collect product offers from different merchants and allow users to compare prices and features'.⁴⁷¹ In 2024, Google derived [X]% and [X]% of its UK search advertising revenue from text adverts and shopping adverts, respectively.⁴⁷²
- 5.109 Google sells search advertising via its platforms – Google Ads and Search Ads 360 (SA360). Search advertising on Google's general search products can also be purchased through third party interfaces that utilise Google Ads API.⁴⁷³
- 5.110 Google submitted that over the next five years AI [X].⁴⁷⁴ Consistent with this submission Google is already incorporating AI into its search advertising products, eg:

⁴⁶⁷ Other types of advertisement displayed on Google's SERP include local adverts, hotel adverts and Comparison Shopping Service (CSS) adverts. Google's consolidated response to the CMA's RFI.

⁴⁶⁸ Since March 2024, there are two types of shopping or product listing ads (PLAs): (1) standard PLAs that link to websites of the CSS website's merchant partners; and (2) CSS ads that link directly to their websites. [X].

⁴⁶⁹ In 2024, text ads account for [X]% of all adverts displayed and [X]% of all advert clicks on Google Search. Shopping ads accounted for [X]% of all adverts displayed and [X]% of all advert clicks.

⁴⁷⁰ Google's consolidated response to the CMA's RFI.

⁴⁷¹ Google Merchant Center Help, 'Comparison Shopping Services (CSS)', accessed by the CMA on 01 May 2025. [Comparison Shopping Services \(CSS\) - Google Merchant Center Help](#).

⁴⁷² Google's consolidated response to the CMA's RFI.

⁴⁷³ Google's consolidated response to the CMA's RFI.

⁴⁷⁴ Google's consolidated response to the CMA's RFI.

- (a) Performance Max (part of Google Ads)⁴⁷⁵ allows advertisers to set objectives for their advertising campaign with Performance Max allocating spend across all Google advertising channels accordingly (including outside of Google Search).⁴⁷⁶
- (b) In May 2025 Google introduced AI Max for Search and Smart Bidding Exploration, features which both use AI.⁴⁷⁷

- 5.111 Google submitted that because advertisers measure the success of their campaigns by reference to their return on investment, this is the key dimension of competition and Google competes with a variety of different providers.⁴⁷⁸ It stated that its main competitors in search advertising are general search providers (eg [X]), specialised search providers (eg [X], [X], [X]), marketplaces such as [X], social media platforms, and offline media such as television.⁴⁷⁹ More specifically, in response to our Proposed Decision, Google stated that our assessment of its competitive position in search advertising understated the competitive constraint that it faces from AI assistants, describing these as ‘future ad platforms’. Google similarly stated that our Proposed Decision understated the competitive constraint it faces in the UK from retail media advertising providers, including Amazon.⁴⁸⁰
- 5.112 The evidence is broadly consistent with Google’s submission that return on investment is an important factor when advertisers decide how to allocate advertising spend.⁴⁸¹ However, it does not follow that if advertisers maximise return on investment, then a provider of one type of advertising cannot have market power. Rather, if a provider offers a form of advertising for which there are few good alternatives, then advertisers maximising return on investment will purchase significant quantities of this advertising and will be reluctant to switch substantial expenditure to other forms of advertising. This will give the provider of this advertising market power.
- 5.113 Google submitted that the Proposed Decision’s ‘reasoning that high ROI from Google Search ads creates a ‘more effective form of advertising market power’ is flawed’ and that a high return on investment indicates that ‘Google offers a higher

⁴⁷⁵ Google Ads, ‘Google Ads’, accessed by the CMA on 01 May 2025. [Google Ads](#).

⁴⁷⁶ Google Ads, ‘About Performance Max campaigns’, accessed by the CMA on 30 April 2025. [About Performance Max campaigns - Google Ads Help](#).

⁴⁷⁷ Google Ads, ‘Unlock next-level performance with AI Max for Search campaigns’, dated 6 May 2025, accessed by the CMA on 9 June 2025. [Introducing AI Max for Search campaigns](#); Google Ads, ‘Expand your universe of conversions with Smart Bidding Exploration’, dated 21 May 2025, accessed by the CMA on 9 June 2025. [Google announces Smart Bidding Exploration](#).

⁴⁷⁸ Google’s consolidated response to the CMA’s RFI.

⁴⁷⁹ This represents an indicative subset of the competitors listed by Google in this category. The list of competitors in this category is available in Google’s consolidated response to the CMA’s RFI.

⁴⁸⁰ Google’s written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 40. [Google.pdf](#).

⁴⁸¹ For example, see [X] response to the CMA’s RFI. See responses to the CMA’s RFI. See responses to the CMA’s RFI. Google’s internal document.

quality service'⁴⁸² and 'is not exercising market power' since 'market power would manifest through higher prices or reduced quality, both of which would be expected to lead to a lower ROI'.⁴⁸³ However, the Proposed Decision did not assess the return on investment from Google's advertising and only observed that Google's initial submission that advertisers seek to maximise return on investment does not contradict a finding that Google has market power in search advertising.⁴⁸⁴

5.114 In the following sections we have assessed the effectiveness of the alternatives to Google's search advertising by considering evidence relating to:

- (a) Market outcomes;
- (b) Bing and other traditional general search providers;
- (c) Specialised search providers; and
- (d) Display advertising and social media platforms.

5.115 At this stage, AI assistants do not offer advertising that could be an alternative to Google's search advertising. However, in view of the developments of AI assistants in general search, we have also assessed whether expected or foreseeable developments in relation to AI assistants are likely to be sufficient in scope, timeliness and impact to eliminate Google's market power in search advertising over the next five years.⁴⁸⁵

Market outcomes

5.116 Google has accounted for a persistently very high share of UK search advertising revenue by providers of general search. As shown in Figure 5.5 below, Google's UK inflation-adjusted search revenues grew from £[5-10] billion in 2015 to £[10-20] billion in 2024, reflecting a compound annual growth rate of [5-10]%.^{486, 487} Google has continued to account for more than [90-100]% of UK search advertising by providers of general search, an order of magnitude greater than its next closest rival, Bing.

⁴⁸² Google's written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 39. [Google.pdf](#).

⁴⁸³ Google's submission to the CMA.

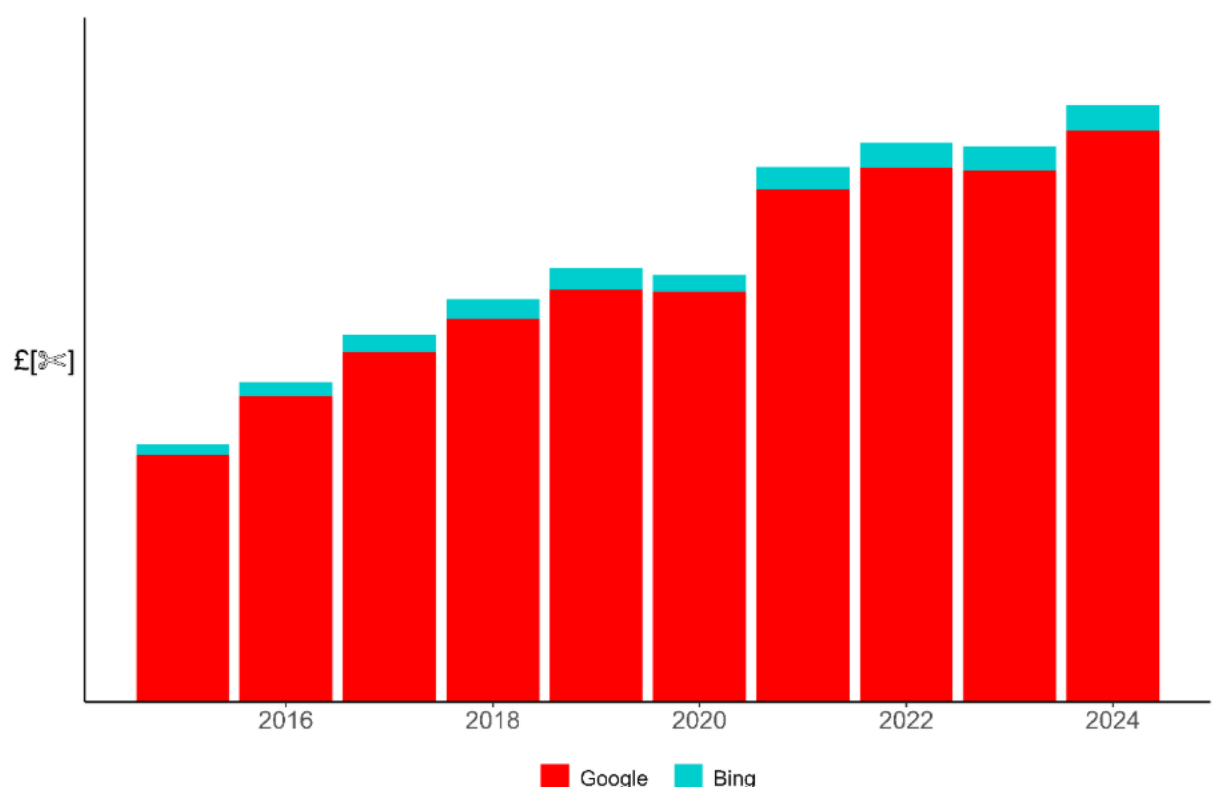
⁴⁸⁴ Google also made submissions about how the performance of Google's Search ads, and the returns Google offers to advertisers, cannot be used as evidence of market power which we discuss while considering market outcomes. Google's submission to the CMA.

⁴⁸⁵ No AI assistants offered a material advertising service during the time period covered by our requests for information, hence it is unsurprising that advertisers and media agencies did not identify these as current alternatives to advertising on Google Search.

⁴⁸⁶ Google's and Bing's revenue figures are in real terms, adjusted to 2024 GBP using Office of National Statistics, 'CPI Index', accessed by the CMA on 12 June 2025. [ONS CPI Index](#).

⁴⁸⁷ Google's consolidated response to the CMA's RFI; [X] response to the CMA's RFI; Google's response to the CMA's RFI; Microsoft's response to the CMA's RFI.

Figure 5.5 Estimated Google and Bing real UK search advertising revenue by year (2015-2024)



Source: CMA analysis of parties' data.

Notes:

(1) [redacted].

(2) We do not include revenue generated by Google and Bing via search advertising to their syndication partners. [redacted]. [redacted]. Our analysis of the search advertising revenues of these search engines between 2020-2024 indicates that even after including these revenues, Google's market share has exceeded [90-100]% in every year since 2020.

5.117 The increase in Google's real total UK revenue over time is substantial and in part explained by growth in the total number of searches. However, revenue per search has also grown over time from £[0.03-0.04] per search in 2015 to £[0.05-0.06] per search in 2024.⁴⁸⁸

5.118 This increase could be due to changes in (a) ad load/depth;⁴⁸⁹ (b) click-through rates; and (c) advertising prices (eg as measured by average cost-per-click). Google made submissions regarding each of (a)-(c) in response to our Proposed Decision⁴⁹⁰ and we consider these below.

5.119 On ad load/depth, Google submitted that the proportion of queries showing an advertisement has decreased from over [redacted]% of queries in 2010 to under [redacted]% in 2024⁴⁹¹ and that, when these adverts are shown the average number of (a) top-

⁴⁸⁸ Google's consolidated response to the CMA's RFI; Google's response to the CMA's RFI.

⁴⁸⁹ Google defines ad load as the proportion of queries that show an advertisement and ad depth as the average number of advertisements shown, when at least one advertisement is shown (see Google's submission to the CMA).

⁴⁹⁰ Google's written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 39b. [Google.pdf](#) and Google's submission to the CMA.

⁴⁹¹ Google's response to the CMA's RFI. Google's consolidated response to the CMA's RFI.

slot text advertisements⁴⁹² and (b) shopping advertisements shown has remained stable in recent years. Google submitted that these trends are contrary to ‘the CMA’s concerns that websites are finding it harder to have visibility in organic results and that users are being inundated with ads’.⁴⁹³ We do not agree that these trends allow this conclusion to be drawn. Advertisements are only one factor affecting the visibility of organic results⁴⁹⁴ and an aggregate analysis may hide patterns for important subsets of queries.⁴⁹⁵

- 5.120 Click-through rates from search ads may have increased over time: in 2015 the number of clicks was [%] of the number of queries that displayed an advert compared to [%] in 2024.⁴⁹⁶ Google submitted that increasing click-through rates indicate an improvement in advertisement quality.⁴⁹⁷ We do not agree that the current evidence necessarily indicates that an increase in click-through rates reflects an increase in quality. Google only earns revenue when an advert is clicked on. Therefore, it has an incentive to increase click-through rates even if this does not reflect an overall quality improvement for a third party.⁴⁹⁸ Additionally, a firm with market power may still have an incentive to increase quality, albeit less so than if faced with greater competition. Therefore, we do not consider that evidence of Google making some improvements in the quality of advertising is inconsistent with a finding of market power, rather it needs to be considered in the context of the wider evidence.
- 5.121 Finally, Google’s real average cost-per-click has varied over time between £[%] to £[%] since 2010. While the real average cost-per-click has generally declined since 2015, it has remained relatively stable since 2020.⁴⁹⁹ It is unclear what conclusion can be drawn from these changes in real average cost-per-click for an assessment of Google’s market power since the composition of Google’s search advertising has changed significantly over time. For example, the average cost-per-click combines prices on both desktop and mobile devices. These prices have shown different trends over time and an increasing proportion of revenue is

⁴⁹² Top slot text advertisements are the text advertisements that appear towards the top of the SERP.

⁴⁹³ Google’s submission to the CMA.

⁴⁹⁴ AI Overviews is an example of a recently introduced feature that affects visibility of organic results.

⁴⁹⁵ For example, it is possible for there to be different patterns between navigational queries and commercial queries.

⁴⁹⁶ Google’s consolidated response to the CMA’s RFI; Google’s response to the CMA’s RFI.

⁴⁹⁷ Google provided an analysis showing that [%]. Google’s submission to the CMA.

⁴⁹⁸ An example of when this might occur is when a consumer searching for a brand is initially only shown organic results, but is now shown (and clicks on) advertising. This will lead to a reduction in advertising [%] without a clear quality improvement.

⁴⁹⁹ Google’s consolidated response to the CMA’s RFI. Google’s response to the CMA’s RFI.

accounted for by searches on mobile devices where cost-per-click has been consistently lower than those on desktop devices.^{500, 501}

- 5.122 In summary, Google's real search advertising revenues have increased significantly over an extended period of time. This increase is a result of both an increase in the total number of searches but also an increase in revenue per search. Google submitted that the quantitative evidence set out above is indicative of 'improvements in the quality of Google's Search ads' and is 'not consistent with Google exercising market power'.⁵⁰² However, as explained above, we disagree that these trends necessarily demonstrate either improvements in the quality of Google's search advertising or the absence of market power.

Competition from Bing and other traditional general search providers

- 5.123 As shown in the discussion of competition in general search, Google is by far the most-used traditional general search provider in the UK. The main alternative traditional general search provider is Bing and almost all other traditional general search providers rely on syndication agreements to buy organic results and/or advertisements.⁵⁰³ Moreover, as set out above, Google accounts for the vast majority of search advertising revenue from these providers in the UK.
- 5.124 Businesses that advertise on Google generally indicated that they see advertising on Bing as the closest alternative to Google's search advertising.^{504, 505} Although around half of the advertisers [X] identified some advantages in using Bing's search advertising,⁵⁰⁶ nearly all respondents [X] recognised disadvantages of using Bing compared to Google's search advertising.⁵⁰⁷ Most respondents highlighted Bing's lower scale and reach [X]⁵⁰⁸ – indicating the importance of attracting users in order to monetise effectively. Several also told us that Bing was

⁵⁰⁰ Our analysis shows that the real average CPC in the UK on mobile devices has fallen by [10-20]% since 2017, although it has been stable since 2021. Average CPC has increased by [5-10]% on desktop devices. Annual average CPC on mobile devices has consistently been [X]p-[X]p cheaper than on desktop devices therefore, the increasing weight of mobile CPC over time will mechanically lead to a decrease in the average CPC across device types.

⁵⁰¹ Similarly, the average mixes text and shopping advertisements and the proportion of clicks accounted for by shopping advertisements (which have a lower cost-per-click) has also been increasing. See Appendix B for patterns in text and shopping advertisement prices over time.

⁵⁰² Google's submission to the CMA.

⁵⁰³ Brave is the only other search engine that entirely sells its search advertising independently. Brave's response to the CMA's RFI.

⁵⁰⁴ Bing is used by all the businesses that advertise on Google [X], and half [X] mention only Microsoft Ads (which can also include other search engines such as DuckDuckGo) as an alternative. See responses to the CMA's RFI; response to the CMA's RFI; responses to the CMA's RFI.

⁵⁰⁵ While some [X] mention other traditional general search providers as alternatives, this is nearly always in the context of purchasing advertising through syndication agreements. See responses to the CMA's RFI; responses to the CMA's RFI. Note that only one respondent ([X]) mentions traditional general search providers outside of the syndication agreements (these were Baidu and Yandex).

⁵⁰⁶ See responses to the CMA's RFI; response to the CMA's RFI; responses to the CMA's RFI; response to the CMA's RFI.

⁵⁰⁷ See responses to the CMA's RFI.

⁵⁰⁸ See responses to the CMA's RFI; responses to the CMA's RFI; responses to the CMA's RFI; response to the CMA's RFI.

only complementary to Google [REDACTED],⁵⁰⁹ which is consistent with evidence from the US DoJ Search Litigation.⁵¹⁰

- 5.125 Evidence from Microsoft was consistent with the evidence from advertisers and media agencies. Microsoft submitted that Google is ‘by far’ its main competitor and a ‘must have’ for advertisers. Microsoft submitted that, as a result, its strategy is [REDACTED].⁵¹¹ This submission is consistent with some of Microsoft’s internal documents.⁵¹²
- 5.126 Google⁵¹³ [REDACTED]⁵¹⁴ agreed that [REDACTED]. Microsoft has already started deploying generative AI capabilities in search advertising and it plans [REDACTED].⁵¹⁵ However, the evidence did not indicate that the deployment of generative AI was likely to materially change competition between Microsoft and Google in relation to search advertising, and some of the advertisers [REDACTED] told us that Microsoft’s position has not changed as a result of this.⁵¹⁶
- 5.127 In summary, the evidence shows that, amongst traditional general search providers, Microsoft is the best alternative to Google’s search advertising, but it currently exerts a limited competitive constraint. Bing’s significantly smaller scale in general search substantially limits the extent to which Microsoft can attract advertisers and hence compete with Google for search advertising budgets. Although Microsoft [REDACTED], at this stage the evidence does not indicate that this is likely to significantly affect competition between Microsoft and Google in search advertising now and/or in the next five years.

Competition from specialised search providers

- 5.128 Many specialised search providers also show advertising to users. For example, Amazon shows users ‘sponsored’ ads which generated £[0-5] billion in search advertising revenue in the UK in 2024.⁵¹⁷ As noted above, Google submitted that its search advertising competes with specialised search providers and several third parties also referred to advertising on specialised search providers. Therefore, we have assessed the extent to which advertising on specialised search providers is an alternative to Google’s search advertising.

⁵⁰⁹ See responses to the CMA’s RFI; response to the CMA’s RFI; responses to the CMA’s RFI.

⁵¹⁰ The judgment sets out how ‘[a]dvertisers consistently testified that shifting significant ad spend from Google to Bing would be ineffective (and unwise) because of Bing’s lack of scale’. *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, paragraph 233. [pr24-59-Google.pdf](#).

⁵¹¹ Microsoft’s response to the CMA’s RFI.

⁵¹² For example, one internal document titled ‘[REDACTED]’ states that due to Google’s position ‘[REDACTED]’. Microsoft’s internal document.

⁵¹³ This is discussed in some of Google’s internal documents. For example, Google’s internal document; Google’s internal document.

⁵¹⁴ [REDACTED] response to the CMA’s RFI.

⁵¹⁵ Microsoft’s response to the CMA’s RFI. Example documents are Microsoft’s internal document; Microsoft’s internal document.

⁵¹⁶ See responses to CMA’s RFI; see responses to CMA’s RFI.

⁵¹⁷ Amazon’s response to the CMA’s RFI.

- 5.129 The evidence shows that specialised search providers can be a limited alternative to Google's search advertising.
- 5.130 First, as we noted in the context of general search, since specialised search providers focus on particular sectors, they can only be an alternative to Google's search advertising for advertisers in those sectors. For example, a hotel provider will not view a sponsored result on Amazon as an alternative to Google's search advertising. This limits the competitive constraint that any individual specialised search provider can impose on Google's search advertising. Consistent with this observation, several advertisers told us that specialised search providers are not relevant for their activities [REDACTED].⁵¹⁸
- 5.131 Second, for the respondents for whom specialised search providers are relevant [REDACTED], most [REDACTED] said that they are not an alternative to Google's search advertising.⁵¹⁹ In particular, the limited reach and scale was identified by many of these advertisers [REDACTED] as a key disadvantage compared to Google.⁵²⁰ Some of these advertisers [REDACTED] told us that advertising on specialised search providers was complementary to, rather than an alternative for, Google's search advertising.⁵²¹
- 5.132 Third, advertisers were generally of the view that the constraint from specialised search providers on Google's search advertising is unlikely to materially change in the next five years, with only a few [REDACTED] suggesting that specialised search providers may become stronger alternatives over the next five years (for example, by enhancing their capabilities and targeting advertisements through AI).⁵²²
- 5.133 Fourth, the evidence from advertisers is consistent with the evidence from media agencies, who said that specialised search providers, particularly Amazon, can offer good capabilities but that they also come with limitations. Specifically:
- (a) Some [REDACTED] said that specialised search providers have generally become more competitive in the past few years,⁵²³ and they all [REDACTED] mentioned Amazon as an alternative to Google's search advertising services.⁵²⁴ Specifically for Amazon, some positives were that it is large (for example that it has 'more searches than Google for certain types of query')⁵²⁵ and that it attracts high-intent customers (for example, 'consumers who are ready to make a purchase, leading to stronger performance outcomes').⁵²⁶

⁵¹⁸ See [REDACTED] responses to the CMA's RFI; responses to the CMA's RFI.

⁵¹⁹ See responses to the CMA's RFI; response to the CMA's RFI; responses to the CMA's RFI; response to the CMA's RFI.

⁵²⁰ See responses to the CMA's RFI; response to the CMA's RFI; responses to the CMA's RFI.

⁵²¹ See responses to the CMA's RFI; response to the CMA's RFI; response to the CMA's RFI.

⁵²² See responses to the CMA's RFI; response to the CMA's RFI. All others suggested that it is unlikely to change.

⁵²³ [REDACTED] response to the CMA's RFI; [REDACTED] response to the CMA's RFI.

⁵²⁴ See [REDACTED] responses to the CMA's RFI.

⁵²⁵ See [REDACTED] responses to the CMA's RFI.

⁵²⁶ See [REDACTED] responses to the CMA's RFI.

- (b) All media agencies identified that specialised search providers were limited in their reach/scale [REDACTED],⁵²⁷ for example because they are only available to sellers of specific products relevant to that specialised search provider [REDACTED].⁵²⁸ The limitations on who can purchase advertising were also recognised in relation to Amazon [REDACTED],⁵²⁹ as well as its limited reporting/insight options.⁵³⁰

5.134 Fifth, Google [REDACTED] in its internal documents. [REDACTED]⁵³¹ [REDACTED]⁵³² [REDACTED]. For example:

- (a) A Google email chain from February 2020 sets out that '[REDACTED]' with [REDACTED]% of advertisers expecting to [REDACTED]. The same email chain also sets out that [REDACTED].⁵³³
- (b) One quarterly update from October 2024 to the Board of Directors on [REDACTED].⁵³⁴ However an earlier board update in July 2024 [REDACTED].⁵³⁵

5.135 The above suggests that Amazon is likely to exercise a stronger competitive constraint on Google's search advertising than other specialised search providers. As noted at paragraph 5.111 above, Google also submitted that Amazon, as well as other retail media advertising providers, have experienced strong growth in the UK and this is projected to continue.

5.136 However, the constraint imposed by Amazon is limited in a number of ways, including by the fact that shopping represents [REDACTED] of Google's search advertising revenue; and that Amazon could only be an alternative for a minority of advertisers (see paragraphs 5.130, 5.131, and 5.133(b)). Additionally, Amazon's search advertising is only available to firms who sell their products through Amazon's marketplace.⁵³⁶ This means that Amazon's advertising is not an alternative for many firms.⁵³⁷ Furthermore, Amazon also purchases [REDACTED] of search advertising (both text and shopping advertisements) from Google.^{538, 539} This would appear to be unnecessary if Amazon's advertising was a good alternative to Google's search advertising.

5.137 Lastly, we asked advertisers and media agencies how they currently anticipate the competitive constraint from specialised search providers will change over the next

⁵²⁷ See [REDACTED] responses to the CMA's RFI.

⁵²⁸ See [REDACTED] responses to the CMA's RFI.

⁵²⁹ See [REDACTED] responses to the CMA's RFI.

⁵³⁰ [REDACTED] response to the CMA's RFI.

⁵³¹ Google's internal document; Google's internal document; Google's internal document.

⁵³² Google's internal documents.

⁵³³ Google's internal document.

⁵³⁴ Google's internal document.

⁵³⁵ Google's internal document.

⁵³⁶ Amazon's response to the CMA's RFI.

⁵³⁷ For example, the leading purchasers of Google's search advertising in the UK include [REDACTED] who do not sell through the Amazon Marketplace.

⁵³⁸ There was an inconsistency in the data provided by Amazon and Google. However, Amazon's data indicated that it purchased £[200-300] million of Google's shopping ads in the UK in 2024 which accounted for [30-40]% of Amazon's total advertising expenditure and [60-70]% of their search advertising expenditure on Google.

⁵³⁹ Amazon's response to the CMA's RFI.

five years. Some advertisers [redacted]⁵⁴⁰ and several media agencies [redacted]⁵⁴¹ suggested that specialised search providers may become a more attractive alternative to Google's search advertising in the future. However, the remaining majority of respondents did not indicate that they anticipate changes to this option, and two respondents even suggested that the attractiveness of specialised search providers would decrease in the future because of the increased use of AI assistants making decisions on behalf of consumers.⁵⁴² Furthermore, Google's internal documents did not indicate that Google expects the competitive constraint from specialised search providers to change in the future.

Specialised search and Google's shopping adverts

- 5.138 As described above, Google sells two main types of search advertising, text and shopping adverts. Shopping adverts are shown in response to certain commercial queries. Since specialised search providers tend to focus on commercial transactions, it is possible that specialised search providers (eg Amazon) could be a more effective alternative to Google's search advertising. For this reason, and because shopping adverts account for approximately [redacted]% of Google's search advertising revenue,⁵⁴³ we have assessed whether specialised search providers could be a more effective alternative to Google's shopping adverts.
- 5.139 Some evidence suggests that some specialised search providers may be a more effective alternative to Google's shopping advertisements than for text advertisements:
- (a) Shopping adverts are cheaper than text adverts which could be consistent with greater competition. In December 2024 the real average cost-per-click for shopping adverts was £[redacted], compared to £[redacted] for text adverts.^{544, 545}
 - (b) Most of the media agencies we contacted [redacted] considered that there are differences in the alternatives that are available between the different types of advert.⁵⁴⁶ For example, [redacted] said that Amazon is a 'considerably more significant competitor to Google' in shopping adverts and that they expect that online retailers will provide a stronger alternative to Google in shopping adverts than in text adverts,⁵⁴⁷ while [redacted] said that for shopping and retail-

⁵⁴⁰ See responses to the CMA's RFI; responses to the CMA's RFI.

⁵⁴¹ See responses to the CMA's RFI.

⁵⁴² See responses to the CMA's RFI.

⁵⁴³ Google's consolidated response to the CMA's RFI; Google's consolidated response to the CMA's RFI.

⁵⁴⁴ Products and services advertised through shopping and text ads are likely to be significantly different. This different product/service mix could also, at least in part, explain the different price level observed between shopping and text ads. Our analysis also shows that text ads are considerably more expensive than shopping ads even when comparing the two ad formats on desktop and mobile devices separately.

⁵⁴⁵ Google's consolidated response to the CMA's RFI.

⁵⁴⁶ See [redacted] responses to the CMA's RFI.

⁵⁴⁷ [redacted] response to the CMA's RFI.

based objectives retail platforms such as Amazon and Google Shopping work best.⁵⁴⁸

- 5.140 We also note that in the US DoJ Search Litigation, the judge found that the competitive conditions for shopping adverts are different,⁵⁴⁹ and specifically highlighted competition from Amazon. The judge found that, notwithstanding Google's leading market share (74%), the recent history of new entrants and their growth (such as Amazon, Target and Walmart) show that barriers to entry and expansion are not so high.⁵⁵⁰
- 5.141 However, we found limited evidence that Google faces materially stronger competition in relation to shopping adverts than text adverts:
- (a) When asked, most businesses that advertise on Google [redacted] did not identify any material differences in the alternatives available to them for different types of Google search advertising.⁵⁵¹ Some of the respondents explained that the alternatives they list to Google's search advertising would not differ for different types of search advert [redacted].⁵⁵² One respondent said that there is 'no dependency as we would expect to prioritise Google advertising regardless of the type of search advertisement concerned'.⁵⁵³
 - (b) We tested this further by asking some advertisers directly about the alternatives to Google shopping adverts. The majority of advertisers that provided an answer to this question [redacted] indicated that Google remains the main, or only, provider of this type of advertising.⁵⁵⁴ A few advertisers [redacted] described purchasing third party advertising through comparison shopping sites as an alternative to Google Ads,⁵⁵⁵ though most of these advertisers [redacted] also stated that they do not currently purchase advertising from these suppliers.⁵⁵⁶ Only one of the advertisers that responded to this question identified Amazon as an alternative, but this advertiser also stated that it does not currently purchase from Amazon for strategic considerations.⁵⁵⁷
 - (c) We specifically sought views from Google's top 10 UK customers for shopping adverts, who together accounted for [10-20]% of shopping advert

⁵⁴⁸ [redacted] response to the CMA's RFI.

⁵⁴⁹ The judge found that while text advertisement prices had been increasing, shopping advertisement prices remained largely flat. He concluded that 'Google's ability to profitably raise text ads prices is surely due in part to the lack of any meaningful competition in that submarket—Microsoft is its only true competitor... The competitive conditions for PLAs are very different. Amazon, as discussed, is a major competitor.' *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, pages 180-185. [pr24-59-Google.pdf](#).

⁵⁵⁰ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, pages 180 to 185. [pr24-59-Google.pdf](#).

⁵⁵¹ See responses to the CMA's RFI; responses to the CMA's RFI; responses to the CMA's RFI.

⁵⁵² See responses to the CMA's RFI; response to the CMA's RFI.

⁵⁵³ [redacted] response to the CMA's RFI.

⁵⁵⁴ See [redacted] responses to the CMA's RFI and [redacted] response to the CMA's RFI.

⁵⁵⁵ See [redacted] responses to the CMA's RFI.

⁵⁵⁶ See [redacted] responses to the CMA's RFI.

⁵⁵⁷ [redacted]'s response to the CMA's RFI.

revenue in the UK in 2024.⁵⁵⁸ We asked these customers the extent to which advertising on specialised search providers is an alternative to Google's search advertising and whether this depends on the type of advertising (ie text, shopping adverts). None of those that responded said that specialised search providers are an effective alternative to Google, with several [REDACTED]⁵⁵⁹ not using them and others identifying limitations such as their limited scale [REDACTED]⁵⁶⁰ and the siloed nature of their inventory [REDACTED].⁵⁶¹

- (d) As set out in paragraph 5.134 above, Google's internal documents [REDACTED].
- (e) Many of the factors (see paragraphs 5.130 to 5.133) which limit the extent to which specialised search providers are an alternative to Google's search advertising in general apply equally to Google's shopping adverts.

Summary of evidence in relation to specialised search

5.142 Overall, we consider that specialised search providers (both in isolation and in aggregate) are a limited alternative to Google's search advertising. They are relevant only in certain sectors, where advertisers and media agencies often see them as complementary rather than alternatives to Google's search advertising because of their more limited reach and scale. Amazon is likely to be a more effective alternative to Google's search advertising both in general and more specifically in shopping adverts. However, this constraint is still limited by the fact that shopping represents [REDACTED] of Google's search advertising revenue. We have also not seen evidence of any expected or foreseeable developments that indicate the competitive constraint that specialised search providers exercise, in isolation or in aggregate, on Google's search advertising is likely to significantly change in the next five years.

Competition from display advertising (including social media)

- 5.143 The evidence we have seen indicates that display advertising (including that on social media platforms) is a limited alternative to Google's search advertising.
- (a) The majority of businesses that advertise on Google [REDACTED] indicated that search and display advertising are generally not direct substitutes but are complementary to each other.⁵⁶² TikTok also gave this view.⁵⁶³ All these respondents explained that search and display have different purposes to

⁵⁵⁸ Google's consolidated response to the CMA's RFI.

⁵⁵⁹ See responses to the CMA's RFI; responses to the CMA's RFI.

⁵⁶⁰ See responses to the CMA's RFI.

⁵⁶¹ [REDACTED] response to the CMA's RFI.

⁵⁶² See responses to the CMA's RFI; responses to the CMA's RFI; responses to the CMA's RFI; response to the CMA's RFI.

⁵⁶³ TikTok's response to the CMA's RFI.

each other, and a few [redacted] mentioned that they have different positions in the advertising 'funnel'.⁵⁶⁴

- (b) A minority of respondents [redacted] identified social media platforms, such as TikTok and Meta, as being alternatives to Google's search advertising.⁵⁶⁵ These respondents described several advantages of social media, including a diverse range of advert formats⁵⁶⁶ and significant user reach,⁵⁶⁷ in particular with younger user segments.⁵⁶⁸
- (c) However, most [redacted] of these respondents also indicated drawbacks for advertising through these social media platforms,⁵⁶⁹ including that users on them have limited purchasing intent⁵⁷⁰ and that it is harder to achieve KPIs through them.⁵⁷¹ For example, one media agency stated that Meta is a 'walled garden' with an 'inability to target keyword searches' and that the other platforms have more 'inspirational' or 'educational' search behaviour 'meaning that performance KPIs harder to achieve'.⁵⁷²
- (d) Google's internal documents indicate that Google views [redacted]⁵⁷³ and, contrary to Google's submissions, there is little indication in some of Google's internal documents that Google perceives display advertising as exercising a material competitive constraint on its search advertising.⁵⁷⁴ In line with this, the US DoJ Search Litigation described how part of Google's reasoning for launching a new advertising product known as Demand Gen (or Discovery Ads) was because Google lacked a direct competitor to Meta's social media advertising.⁵⁷⁵
- (e) When specifically asked, the majority of respondents [redacted] did not identify social media platforms as alternatives to Google's shopping adverts.⁵⁷⁶

5.144 Overall, we consider that display advertising and social media platforms are not an effective alternative to Google's search advertising. The evidence also does not

⁵⁶⁴ See responses to the CMA's RFI; response to the CMA's RFI. Note that this is consistent with findings in DAMS (see [Online platforms and digital advertising market study](#), July 2020 (DAMS), paragraph 5.23) and in the US DoJ Search Litigation (*United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, paragraph 218. [pr24-59-Google.pdf](#)).

⁵⁶⁵ See responses to the CMA's RFI; responses to the CMA's RFI; response to the CMA's RFI.

⁵⁶⁶ [redacted] response to the CMA's RFI.

⁵⁶⁷ Skyscanner's response to the CMA's RFI; [redacted] response to the CMA's RFI.

⁵⁶⁸ [redacted] response to the CMA's RFI.

⁵⁶⁹ See responses to the CMA's RFI; responses to the CMA's RFI.

⁵⁷⁰ See responses to the CMA's RFI; response to the CMA's RFI.

⁵⁷¹ See responses to the CMA's RFI.

⁵⁷² [redacted] response to the CMA's RFI.

⁵⁷³ Google's internal document. Also see: Google's internal document. Also see: Google's internal document. Google's internal document.

⁵⁷⁴ [redacted]. Google's internal document. Also see: Google's internal document.

⁵⁷⁵ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, pages 71 and 173. [pr24-59-Google.pdf](#).

⁵⁷⁶ See responses to the CMA's RFI.

indicate that social media advertising is likely to become a materially stronger competitor to Google's search advertising in the next five years.

Competition from advertising on AI assistants

- 5.145 Google did not identify AI assistants as being a current competitor to its search advertising,⁵⁷⁷ which likely reflects that no AI assistants currently offer a material level of advertising. However, in response to our Proposed Decision, Google submitted that we had understated the competitive constraint that it faces from AI assistants, describing these as 'future ad platforms' (see paragraph 5.111).⁵⁷⁸
- 5.146 In view of Google's submissions and the developments of AI assistants in general search, we have also assessed the extent to which they may affect Google's position in search advertising in the next five years.
- 5.147 We asked AI companies whether they are planning to monetise their products through digital advertising and over half [X] of them have no plans to do so.⁵⁷⁹ This includes [X] who said with respect to [X] that it 'does not currently have plans to monetise through advertising'.⁵⁸⁰ However we understand from other evidence that [X].⁵⁸¹ [X]:
- (a) Perplexity said that it has started [X]⁵⁸² and indicates in its internal documents that it is [X], including [X].⁵⁸³
 - (b) [X].⁵⁸⁴
 - (c) Microsoft said that it is currently monetising Copilot through Microsoft Advertising, and that it is planning to [X].⁵⁸⁵
- 5.148 Following our Proposed Decision, we gathered further evidence. [X], [X] and [X] confirmed that they have no plans to implement advertising in the UK in the next 12 months.⁵⁸⁶ [X] we note OpenAI has recently launched Instant Checkout, allowing US ChatGPT users to purchase from retailers in the chat, as well as new features allowing merchants to build integrations with ChatGPT ('Agentic

⁵⁷⁷ Google's consolidated response to the CMA's RFI.

⁵⁷⁸ Google's written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 40. [Google.pdf](#).

⁵⁷⁹ See [X] responses to the CMA's RFI.

⁵⁸⁰ [X] response to the CMA's RFI.

⁵⁸¹ [X] internal document.

⁵⁸² Perplexity's response to the CMA's RFI.

⁵⁸³ [X].

⁵⁸⁴ [X] response to the CMA's RFI.

⁵⁸⁵ Microsoft's response to the CMA's RFI.

⁵⁸⁶ [X] response to the CMA's RFI; [X] response to the CMA's RFI. [X] response to the CMA's RFI.

Commerce Protocol'). OpenAI described these as the 'next step in agentic commerce'.⁵⁸⁷

- 5.149 At this stage AI assistants are not monetising their products with advertising that could be a meaningful alternative to Google's search advertising. Furthermore, it is currently unclear how these providers will monetise their alternatives to Google's general search services and indeed whether they will do so successfully. This contrasts to Google which is already showing advertisements in AI Overviews in the US and is experimenting with advertisements in AI Mode.⁵⁸⁸
- 5.150 Consistent with this, the US DoJ Search Litigation saw evidence that commercial queries are not, at present, a common use case for AI assistants and thus have not cannibalised commercial queries on general search engines. However, the US DoJ Search Litigation also saw evidence that AI assistants are hoping to attract more commercial queries, that can be monetised with adverts. Although there is an expectation among market participants that this will happen at some point, exactly when is unclear.⁵⁸⁹
- 5.151 We sought information from purchasers of Google's search advertising on the potential for AI assistants to develop into an alternative to Google's search advertising. The majority of businesses that advertise on Google [redacted] said that AI assistants have the potential to become an alternative to Google's search advertising in the next five years, although some noted that this was still uncertain.⁵⁹⁰ In particular:
- (a) There were a variety of views given about what advertising on AI assistants might offer. For example, one advertiser said that AI assistants will 'present a significant opportunity to reach targeted audiences with personalised product recommendations',⁵⁹¹ but another advertiser [redacted] said that 'AI-ads are likely to have less commercial intent than search'⁵⁹² and another that 'any emerging AI-based solution is likely to be only an addition or complement' to Google's search advertising.⁵⁹³
 - (b) Some respondents [redacted] said that it is difficult to predict the role AI will play in search advertising.⁵⁹⁴ For example, Farfetch said that 'it is hard to speculate

⁵⁸⁷ OpenAI, 'Buy it in ChatGPT: Instant Checkout and the Agentic Commerce Protocol', 29 September 2025, accessed by the CMA on 30 September 2025. [Buy it in ChatGPT: Instant Checkout and the Agentic Commerce Protocol | OpenAI](#).

⁵⁸⁸ Google Ads & Commerce Blog, 'More opportunities for your business on Google Search', dated 21 May 2025, accessed by the CMA on 10 June 2025. [New ways AI in Search helps your business](#).

⁵⁸⁹ *U.S. and Plaintiff States v. Google LLC*, Memorandum Opinion, 2 September 2025, paragraphs 65-66 [United States of America v. Google LLC – CourtListener.com](#).

⁵⁹⁰ See responses to the CMA's RFI; responses to the CMA's RFI; responses to the CMA's RFI; see response to the CMA's RFI.

⁵⁹¹ Lovehoney Group's response to the CMA's RFI.

⁵⁹² [redacted] response to the CMA's RFI.

⁵⁹³ [redacted] response to the CMA's RFI.

⁵⁹⁴ See responses to the CMA's RFI; responses to the CMA's RFI.

what advertising on AI assistants will actually look like and whether it will be a true alternative to Google's search advertising'.⁵⁹⁵

- (c) Some respondents [X] suggested that they would advertise on AI interfaces if there was a shift from customers to using them more.⁵⁹⁶ For example, Boohoo Group said that this advertising 'might become more relevant if AI assistants become a major part of how people search, but for now it is very early days'.⁵⁹⁷

5.152 Finally, as noted in the context of traditional general search providers (paragraph 5.124), scale is an important factor in competing with Google. Currently AI assistants, especially those other than ChatGPT, are significantly smaller than Google for search use cases (see Figure 5.3). Therefore, there is currently significant uncertainty as to whether any AI assistant will achieve sufficient scale in search use cases to become a credible alternative to Google's search advertising.

5.153 Overall, AI assistants are not currently an alternative to Google's search advertising. Some providers are exploring the potential to introduce advertising and there is some evidence that AI assistants have the potential to become an alternative to Google's search advertising in the future. However, these developments are at a very early stage and there is substantial uncertainty regarding whether AI assistants will become a meaningful alternative to Google's search advertising. Consequently, the current evidence does not demonstrate that the expected or foreseeable developments in relation to AI assistants are likely to be sufficient in scope, timeliness and impact to eliminate Google's market power in relation to search advertising in the next five years.

Summary of evidence on competition in search advertising

5.154 As a result of Google's strong position in general search, Google has been able to attract advertisers and monetise its general search products through search advertising. Indeed, Google has accounted for over [90-100]% of UK search advertising by traditional general search providers since at least 2015⁵⁹⁸ and Google has continued to grow its real search advertising revenues throughout this period.⁵⁹⁹ Given this context, we have assessed whether and the extent to which current and potential competitive constraints could affect Google's strong position in search advertising now and in the next five years.

⁵⁹⁵ Farfetch's response to the CMA's RFI.

⁵⁹⁶ See responses to the CMA's RFI; response to the CMA's RFI; responses to the CMA's RFI.

⁵⁹⁷ Boohoo Group's response to the CMA's RFI.

⁵⁹⁸ See paragraph 5.116.

⁵⁹⁹ See also paragraph 5.121 where we discuss how Google's real cost-per-click has generally declined since 2015, although it has remained relatively stable since 2020, and how it is unclear what conclusions can be drawn from this observation.

- 5.155 In summary, we found that currently Microsoft is the best alternative to Google's search advertising amongst traditional general search providers. However, the competitive constraint from Microsoft is limited, in particular by its significantly smaller scale.
- 5.156 There is some evidence that specialised search providers, and particularly Amazon, are an alternative to Google's search advertising. However, overall specialised search providers are a limited alternative to Google's search advertising. They are relevant only in certain sectors, where advertisers and media agencies often see them as complementary rather than alternatives to Google's search advertising because of their more limited reach and scale.
- 5.157 The evidence shows that display advertising and social media platforms are not an effective alternative to Google's search advertising. AI assistants are also not currently an alternative to Google's search advertising because these firms do not currently offer advertising to a meaningful extent.
- 5.158 Notably, and consistent with the above summary of the evidence, several respondents suggested either that there are no viable alternatives to Google's search advertising [redacted]⁶⁰⁰ or that other options would only be complements rather than substitutes for Google [redacted].⁶⁰¹ Google also accounted for a significant proportion of all advertising spend with the advertisers (around [60-70]%) and media agencies (around [20-30]%) we contacted.⁶⁰²
- 5.159 AI assistants may introduce advertising in the future and some third parties said that they have the potential to become an alternative to Google's search advertising in the next five years. However, these developments are at a very early stage and there is substantial uncertainty regarding whether AI assistants will become a meaningful alternative to Google's search advertising. At this stage, the evidence does not indicate that developments in relation to AI assistants are likely to be sufficient in scope, timeliness and impact to eliminate Google's market power in search advertising in the next five years. The evidence also does not indicate that other forms of advertising (eg advertising on Bing or through specialised search providers) are likely to exert a materially stronger competitive constraint on Google's search advertising over the next five years.

Barriers to entry and expansion in general search services

- 5.160 The preceding sections have presented evidence on competition in general search and search advertising, separately. This section discusses evidence relating to barriers to entry and expansion that are relevant to Google's position across

⁶⁰⁰ See responses to the CMA's RFI; response to the CMA's RFI; response to the CMA's RFI.

⁶⁰¹ See [redacted] responses to the CMA's RFI.

⁶⁰² CMA analysis of advertiser and media agency data submissions to question requesting their advertising spend.

general search services and that may affect the competitive constraint from Google's current and potential competitors in general search services currently and in the next five years. Our assessment focuses on the following barriers which the evidence indicated are of most relevance:

- (a) Access to users and default positions;
- (b) Data advantages;
- (c) The costs of developing and maintaining search infrastructure; and
- (d) Barriers to monetisation.

5.161 When assessing these barriers to entry and expansion we have considered the role of Google's wider ecosystem of products. Google's products and services range from user facing products, such as YouTube and Gmail, to advertiser products, such as Google Ad Manager, to products for website owners, such as Google Analytics.⁶⁰³ Many of these products have large user bases.⁶⁰⁴ As we discuss further below, these products (eg Android and Chrome) give Google influence over access points to general search and provide Google with access to data which may not be available to others, and which could act as a barrier to entry and expansion in general search services.

User access and default positions

Introduction and Google's submissions

- 5.162 Users can access general search products from a range of different access points. The owners of these access points will often set and/or allow users to select the default general search provider. Therefore, we have considered whether and how these default positions might act as a barrier to entry and expansion.
- 5.163 Google submitted that original equipment manufacturers (OEMs), browsers and users select the default for search access points 'they consider provide the best experience'⁶⁰⁵ and 'the revenue share that OEMs and browsers receive from selling their default space is a function of the quality of the search service'.⁶⁰⁶ Google also submitted that the relative importance of different access points 'may evolve over time' and although this is difficult to predict,⁶⁰⁷ it highlighted:

⁶⁰³ [Google's products and services - About Google.](#)

⁶⁰⁴ For example, an update from January 2023 to Google's Board shows that in December 2022 there were [3-4] billion daily active users on Android, [3-4] billion on YouTube and [2-3] billion on Search. Google's internal document.

⁶⁰⁵ Google's consolidated response to the CMA's RFI.

⁶⁰⁶ Google's consolidated response to the CMA's RFI.

⁶⁰⁷ Google's consolidated response to the CMA's RFI.

- (a) the Android choice screen means that ‘virtually every user in the UK has positively chosen their search engine for Android devices’;⁶⁰⁸
- (b) emerging technologies (for example AI) enabled ‘search providers to differentiate their offerings’;⁶⁰⁹ and
- (c) the ways ‘users access information have diversified’.⁶¹⁰

5.164 In response to our Proposed Decision, Google submitted that its default positions do not give rise to barriers to entry or expansion. It stated that our provisional finding that Google ‘is set or selected as the default on the most important access points’ was unsubstantiated, submitting that the analysis included in our Proposed Decision did not adequately consider:

- (a) Whether Google’s default positions are contestable, stating that ‘OEMs and browser developers choose Google as default due to its objectively superior quality’.
- (b) The options for third party providers to be set as default in the UK, including through the Android choice screen, or through deals with Android OEMs and mobile networks.
- (c) Microsoft’s default positions, ‘including on the most popular default products’. Google additionally stated that the high share of search queries Google receives through Windows PCs indicates that Google’s ‘popularity is the result of user preference’.⁶¹¹

5.165 Google also submitted a number of criticisms of our consumer research in response to our Proposed Decision, stating that this research is not supportive of ‘a finding that users face substantial challenges in using alternative search engines’.⁶¹² We consider these submissions in more detail below.

5.166 Lastly, Google submitted that AI assistants have ample distribution opportunities, including through mobile app store distributions, popular extensions to become the default search engine on Chrome and partnership with global payment providers.⁶¹³ In response to our Proposed Decision, Google stated that AI assistants have already secured distribution agreements in the UK, highlighting:

⁶⁰⁸ Google’s consolidated response to the CMA’s RFI.

⁶⁰⁹ Google’s consolidated response to the CMA’s RFI.

⁶¹⁰ Google’s consolidated response to the CMA’s RFI.

⁶¹¹ Google’s written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 29. [Google.pdf](#).

⁶¹² Google’s written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 31. [Google.pdf](#).

⁶¹³ Google’s written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 35. [Google.pdf](#).

- (a) ChatGPT's agreement with Apple integrating it into Apple Intelligence;
- (b) Perplexity's pre-installation agreements with mobile OEMs/mobile network operators (**MNOs**);
- (c) Copilot's integrations into Microsoft's broader productivity suite; and
- (d) Meta's integration of its AI assistant into its other offerings.⁶¹⁴

5.167 Below, we consider evidence on:

- (a) The relative importance of different access points and whether the relative importance of these access points might change;
- (b) The default positions currently held;
- (c) The importance of default positions to competition; and
- (d) The ability of others to compete for default positions.

5.168 Given the importance of a provider's scale (eg in terms of number of users) to competition (discussed further below) we have considered evidence regarding default positions across various jurisdictions (including the EEA and US as well as the UK).

The relative importance of different access points

5.169 Currently browsers ([70-80]% of Google's queries)^{615, 616} and mobile devices ([70-80]% of Google's queries)⁶¹⁷ are the most common means by which users access Google's general search products in the UK.

5.170 We have considered whether and how the relative importance of access points might change over the next five years, including the emergence of new access points such as AI assistants. Consistent with Google's submission (paragraph 5.163), the evidence indicates that the relative importance of access points could change over time but it is currently unclear whether any changes will be significant. Specifically:

- (a) Most [X] competing traditional general search providers expect the relative importance of their access points to change somewhat over the next five

⁶¹⁴ Google's written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 35. [Google.pdf](#).

⁶¹⁵ Google's consolidated response to the CMA's RFI.

⁶¹⁶ Bing received [90 – 100]% of its queries from browsers in 2024 (Microsoft's response to the CMA's RFI), ChatGPT received [40-60]% of its queries via browsers in 2024 (OpenAI's response to the CMA's RFI).

⁶¹⁷ Google's consolidated response to the CMA's RFI.

years but there was no clear agreement regarding what changes might occur.⁶¹⁸

- (b) Some third parties stated that development of AI may lead to shifts in the relative importance of access points.⁶¹⁹
- (c) However, in contrast, Perplexity said that it does not expect the relative importance of its current main access points (web-browser and apps) to change significantly over the next five years.⁶²⁰ Perplexity's decision to launch a web browser in the UK⁶²¹ and [redacted] submission that it is exploring developing a browser⁶²² are consistent with browsers continuing to be an important means of accessing users.

5.171 Therefore, at this stage there is no clear evidence that the use of different access points will change significantly over the next five years. Additionally, while a significant change in the use of different access points could be a competitive threat to Google (for example increased use of AI assistants for general search could lead to an increase in use of ChatGPT), there is also evidence that Google may be well placed to respond should such a shift in consumer behaviour occur and that access to users could continue to be a barrier to entry and expansion for Google's rivals. Specifically:⁶²³

- (a) Google's 'revenue sharing agreements' (**RSAs**) with OEMs contain obligations relating [redacted].⁶²⁴ These provisions (or similar) could be applied to promote Google's Gemini AI assistant as an access point to Google Search.
- (b) Google has recently signed a separate distribution agreement with Samsung in relation to the distribution of Gemini AI assistant. Under this agreement Samsung receives a fixed monthly payment as well as share of Gemini advertising revenue in exchange for preinstalling Gemini [redacted].⁶²⁵
- (c) Several of Google's existing agreements (either globally or outside the UK) contain restrictions on the installation, placement and/or promotion of 'alternative search services' which are typically defined as any service that is 'substantially similar' to Google.⁶²⁶ As set out in more detail at paragraphs

⁶¹⁸ [redacted] responses to the CMA's RFI.

⁶¹⁹ [redacted] responses to the CMA's RFI.

⁶²⁰ Perplexity's response to the CMA's RFI.

⁶²¹ Perplexity's response to the CMA's RFI.

⁶²² [redacted] response to the CMA's RFI.

⁶²³ To the extent that the agreements cited in subparagraphs (a) to (c) contain provisions requiring the exclusive distribution of Google Search, Chrome, Google Assistant or Gemini AI Assistant, the US District Court in the US DoJ Search Litigation has prohibited Google from maintaining such contracts. These remedies are not yet in effect but could in future affect Google's arrangements within the UK or worldwide. *United States and State of Colorado v Google LLC*, Memorandum Opinion of 2 September 2025, pages 3, 119-128.

⁶²⁴ For example in the [redacted]. Google's response to the CMA's RFI.

⁶²⁵ Google's response to the CMA's RFI.

⁶²⁶ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, paragraph 385. [pr24-59-Google.pdf](#).

5.177 to 5.183, the evidence shows that holding default positions is important to compete in general search services. This is in line with examples from the US DoJ Search Litigation of how these arrangements have affected the ability of others to distribute their products. In that case the judge found that the RSA restrictions on preinstalling ‘alternative search services’ caused potential distribution partners to be hesitant to integrate Branch, which had developed a search-adjacent technology, with full functionality.^{627, 628}

- (d) Consistent with the above, some third parties expressed concerns that Google could use distribution agreements to lock rivals out. For example, [X].⁶²⁹ Similarly, [X] said that ‘Google can leverage its broad commercial relationships with OEMs and other distributors to ensure that Google’s AI receives preferred treatment in ways that create competitive challenges for newer entrants, such as [X]’.⁶³⁰
- (e) Google is also able to integrate its AI features directly into the access points it controls, most notably Chrome. For example, Google has recently announced the incorporation of Gemini and AI Mode into Chrome.⁶³¹

5.172 In summary, mobile devices and browsers are currently the most important access points to general search and, although there is the potential for this to change, there is no clear evidence that the use of these different access points will change significantly over the next five years. Therefore, in what follows we have focussed on default positions on mobile devices and browsers.

Default positions held

5.173 Google is set or is selected as the default on many mobile and desktop devices in the UK and globally. Specifically:

- (a) Google is the default on Apple mobile and desktop devices in several territories including the UK, EEA and US. In return for this default status, Google pays Apple a percentage of its search advertising revenue on Safari and Chrome on iOS.⁶³² Apple mobile devices accounted for [30-40]% of all queries to traditional general search providers in the UK in 2024.⁶³³

⁶²⁷ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, pages 244 to 246. [pr24-59-Google.pdf](#).

⁶²⁸ Dmitry Shevelenko, co-founder and Chief Business Officer of Perplexity, also testified that OEMs and carriers are frightened about retaliation from Google for negotiation with nascent competitors. *United States and State of Colorado v Google LLC*, Plaintiffs remedies post-trial brief of 21 May 2025, pages 23, 65 and 66. [gov.uscourts.dcd.223205.1358.0_3.pdf](#).

⁶²⁹ [X] response to the CMA’s RFI.

⁶³⁰ [X] response to the CMA’s RFI.

⁶³¹ [Gemini in Chrome | The next generation of AI in Chrome | Chrome](#).

⁶³² Google’s response to the CMA’s RFI; *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, paragraphs 290 to 299. [pr24-59-Google.pdf](#).

⁶³³ CMA analysis of parties’ data. See [X] responses to the CMA’s RFI.

- (b) Prior to 2019 in the UK and EEA, Google's agreements with Android mobile phone OEMs and MNOs meant that Google was set as the default on Android mobile devices.⁶³⁴
- (c) Since August 2019, following the European Commission's *Google Android* decision, Google has introduced choice screens for general search providers on all new Android phones⁶³⁵ in the EEA and UK.^{636, 637} However, notwithstanding Google's submissions that this created opportunities for third party providers to be set as the default (see paragraph 5.164(c)), data provided by Google shows that in every month since April 2020, a large majority ([X]%) of UK users have selected Google Search as their default when presented with the Android choice screen.⁶³⁸ Additionally, although Google is no longer pre-set as a default within Android phones, OEMs can earn per-device activation payments for pre-installing and prominently placing the Google Search app and Search widget on Android phones through Google's Placement Agreements.⁶³⁹
- (d) Google's agreements with Android mobile phone OEMs and MNOs mean that Google continues to be set as the default on Android mobile devices in the US.⁶⁴⁰
- (e) On desktop devices, Google Search is set as the general default search provider on Google's browser, Chrome, globally.⁶⁴¹ Chrome is the most commonly used desktop browser in the UK.⁶⁴²

5.174 In contrast, Google's rivals hold fewer default positions and those they do hold are on less commonly used access points. For example, Bing is the default search provider on Edge, the default browser on Windows PCs, as well as Amazon Kindle Fire Tablets and a primary default option for a long tail of smaller OEMs and Independent Software Vendors.⁶⁴³ Despite Google's submissions regarding the importance of Bing's default placements, Bing does not hold any material default positions on mobile devices, which account for a high and growing proportion of queries to traditional search providers (see paragraph 5.25). While ChatGPT is

⁶³⁴ See for example, [Online platforms and digital advertising market study](#), July 2020 (DAMS), paragraphs 3.97-3.100 and Appendix H.

⁶³⁵ Including tablets.

⁶³⁶ Android, 'About the choice screen', last updated 12 June 2023, accessed by the CMA 20 May 2025. [Android Choice Screen](#).

⁶³⁷ The choice screen is used to select the default in the home screen search box and Chrome. Android, 'About the choice screen', last updated June 12 2023, accessed by the CMA 20 May 2025. [Android Choice Screen](#).

⁶³⁸ Google's consolidated response to the CMA's RFI.

⁶³⁹ Google's response to the CMA's RFI.

⁶⁴⁰ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, paragraph 59. [pr24-59-Google.pdf](#).

⁶⁴¹ Google's consolidated response to the CMA's RFI.

⁶⁴² Statcounter Global Stats for December 2024. See [Statcounter UK Desktop Browser Shares](#). Accessed 03/06/2025.

⁶⁴³ Microsoft's response to the CMA's RFI. Microsoft Support, 'Change your default search engine in Microsoft Edge', accessed by the CMA on 2 June 2025. [Link](#); Sam Patwagar, Techbout, 'How to Change Default Browser in Windows 11/10', 14 December 2024, accessed by the CMA on 2 June 2025. [Link](#).

available as an alternative to general web search in Apple's Siri, this is only for Siri users with iOS or iPadOS 18.2 or later or macOS 15.2 or later.

- 5.175 Although Google submitted in response to our Proposed Decision that AI assistants have already successfully negotiated distribution agreements,⁶⁴⁴ responses from AI assistants indicate that these are limited in scope. For example, these agreements [REDACTED].
- (a) Microsoft told us that [REDACTED] 'Gemini remains the default assistant on those devices'.⁶⁴⁵
 - (b) OpenAI noted that it has an integration agreement with Apple, but also said that 'Apple is not obliged to set ChatGPT as default'. Further, Google has publicly confirmed that it is close to integrating Gemini on iPhone.⁶⁴⁶
 - (c) Perplexity noted that it has secured distribution agreements with some partners, including Motorola, Samsung and the Gannett/USA TODAY Network.⁶⁴⁷ However, Perplexity said that 'the Google restrictions are something we must continue to navigate', including that preloading is 'typically confined to specific device lines and does not displace Google as the default' and that the Perplexity app 'cannot be set as the device default assistant out-of-the-box'.⁶⁴⁸
 - (d) Both ChatGPT and Perplexity are available to be set as the default search engine on Chrome, but only via an extension, and neither is presented as an option on the current Android choice screen.⁶⁴⁹

- 5.176 Consequently, it is clear that Google is set or selected as the default on the most important access points to general search both in the UK and globally.

Importance of default positions to competition

- 5.177 The evidence consistently shows that default positions are important to compete in general search services since they are an important means by which providers can reach users and can thus act as a barrier to entry and expansion.
- 5.178 First, the high level of compensation paid by Google to access point providers demonstrates that it values default positions highly. In 2024, Google paid around

⁶⁴⁴ Google's written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 35. [Google.pdf](#).

⁶⁴⁵ Microsoft's response to the CMA's RFI.

⁶⁴⁶ OpenAI's response to the CMA's RFI.

⁶⁴⁷ Perplexity's response to the CMA's RFI. In particular, the Motorola agreement is to preload the Perplexity AI assistant onto new smartphones in the US, the Samsung agreement is to offer Perplexity as a preinstalled app or AI assistant on Galaxy devices, and the Gannett/USA TODAY Network agreement is to provide Perplexity with access to premium news content.

⁶⁴⁸ Perplexity's response to the CMA's RFI.

⁶⁴⁹ OpenAI's response to the CMA's RFI. Perplexity's response to the CMA's RFI.

£[3-4] billion for default positions in the UK alone. This figure was [30-40]% of Google's total annual search revenues in the UK.⁶⁵⁰ The substantial majority of the total default payments were paid to Apple ([REDACTED]).⁶⁵¹ In the US DoJ Search Litigation, Sundar Pichai, CEO of Alphabet, confirmed that default placement is valuable to Google despite costing billions of dollars a year.⁶⁵²

5.179 Second, our analysis of Google's data shows that a significant proportion of Google's queries are through an access point where Google is set as the default. In every month since March 2022, more than half ([REDACTED]%) of the total queries to Google Search were through an access point where Google was set as the default and approximately an additional [REDACTED] were through an access point where the user selected Google Search as their default via a choice screen.⁶⁵³

5.180 Third, several Google internal documents indicate the value of default positions to Google:

(a) A Google document from June 2019 sets out how [REDACTED]. The document describes plans to [REDACTED].⁶⁵⁴

(b) Another Google internal document from 2020 contains [REDACTED].^{655, 656, 657}

5.181 Fourth, responses from all competing traditional general search providers⁶⁵⁸ indicate that holding default positions is important to compete in general search services. Furthermore, OpenAI submitted that Google's agreement to be the default on Apple devices '[REDACTED]';⁶⁵⁹ with Perplexity saying that [REDACTED] are constraints on its growth.⁶⁶⁰ Similarly, in the US DoJ Search Litigation, OpenAI described being locked out of mobile distribution by Google as an 'existential fear', and Nick Turley, OpenAI's Head of Product, described distribution as critical to improving ChatGPT.⁶⁶¹ Perplexity's co-founder and Chief Business Officer, Dmitry Shevelenko, estimated that a great majority of his focus is on obtaining distribution

⁶⁵⁰ Google's consolidated response to the CMA's RFI; Google's consolidated response to the CMA's RFI.

⁶⁵¹ Google's consolidated response to the CMA's RFI; Google's consolidated response to the CMA's RFI; Google's consolidated response to the CMA's RFI.

⁶⁵² Reuters, 'Google CEO acknowledges importance of being default search engine in US trial', dated 31 October 2023, accessed by the CMA on 4 June 2025. [Link](#).

⁶⁵³ Google's consolidated response to the CMA's RFI.

⁶⁵⁴ Google's internal document.

⁶⁵⁵ Google's internal document.

⁶⁵⁶ We asked Google to provide all internal documents produced since 1 January 2022 discussing the impact of Google losing or Google being unable to acquire default positions across Access Points. [REDACTED]. Google's consolidated response to the CMA's RFI.

⁶⁵⁷ Another Google internal document from 2014 estimated that the introduction of Apple Suggestions on Apple devices led to a [REDACTED]. Another internal document from 2016 appears to show that Google assume that [REDACTED]. Google's consolidated response to the CMA's RFI; Google's consolidated response to the CMA's RFI.

⁶⁵⁸ Responses to the CMA's RFI.

⁶⁵⁹ OpenAI's response to the CMA's RFI.

⁶⁶⁰ Perplexity's response to the CMA's RFI.

⁶⁶¹ *United States and State of Colorado v Google LLC*, Plaintiffs remedies post-trial brief of 21 May 2025, pages 25, 30, and 45. gov.uscourts.dcd.223205.1358.0_3.pdf.

deals with OEMs and carriers,⁶⁶² highlighting the importance of such deals to Perplexity.

5.182 Fifth, there is also evidence indicating that defaults impact user behaviour, in particular because users rarely change the default.

- (a) A Google document from February 2023 discusses the results of an online survey carried out among smartphone users in January. In this survey, [X]% of UK users had not changed their default search engine. Of this group, [X]% were not aware they even could change, [X]% never thought about changing, and [X]% were happy with their default search provider.⁶⁶³
- (b) DuckDuckGo said that ‘consumers seldom change their default search engine’ and that ‘consumer inertia in changing search defaults is compounded by friction inserted into the choice architecture of operating systems like Android which makes it difficult or impossible for users to switch search defaults’.⁶⁶⁴
- (c) In the consumer research, although most respondents were aware that they could change their default search provider on the device they used, only a handful of respondents were able to do this readily. Others were typically not very confident in tackling the task and often admitted that they did not know how to switch the default search engine.⁶⁶⁵
- (d) Evidence in the US DoJ Search Litigation, including Google’s internal documents, showed that the vast majority of searches are carried out by users out of habit and that users do not typically make an active, deliberate choice of search engine.⁶⁶⁶ Similarly, in the US trial Remedies Judgment, the court found the agreements ‘have directly and significantly contributed to Google’s scale advantage’.⁶⁶⁷

5.183 Finally, the finding that defaults are impactful in search is consistent with research from other settings, as the power of default settings is an area of behavioural economics that has been well-researched and is well-evidenced across a wide range of settings.⁶⁶⁸

⁶⁶² *United States and State of Colorado v Google LLC*, Plaintiffs remedies post-trial brief of 21 May 2025, page 23. [gov.uscourts.dcd.223205.1358.0.3.pdf](https://www.uscourts.gov.uscourts.dcd.223205.1358.0.3.pdf).

⁶⁶³ Google’s internal document.

⁶⁶⁴ DuckDuckGo’s response to the CMA’s RFI.

⁶⁶⁵ Thinks Insight & Strategy qualitative consumer research report, Exploring consumers’ search behaviour, paragraphs 5.18, 5.19.

⁶⁶⁶ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, paragraphs 66-73. [pr24-59-Google.pdf](#).

⁶⁶⁷ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 2 September 2025, page 95. [Download PDF for United States of America v. Google LLC – CourtListener.com](#).

⁶⁶⁸ [Online platforms and digital advertising market study](#), July 2020 (DAMS), paragraph 3.112-3.114. [Mobile browsers and cloud gaming final report](#), paragraphs 8.246-8.270.

- 5.184 Although Google submitted in response to the Proposed Decision that our consumer research does not support a finding that users face substantial challenges in using alternative search engines, we do not consider that these submissions affect our assessment of the importance of defaults:^{669, 670}
- (a) Google critiqued a question asking whether respondents knew that ‘it is possible to change the search engine that [their] device uses’ because devices may have multiple access points to search.⁶⁷¹ While technically correct we consider it very unlikely, in the context of the interview, that participants misunderstood the question.^{672, 673}
 - (b) While Google stated that the survey ‘fails’ to account for the fact that UK Android smartphone users would have selected their preferred search engine through the Choice Screen when setting up their device,⁶⁷⁴ the consumer research aimed to test consumers’ ability to change search defaults throughout the lifecycle of their device, ie after the initial device set up.
 - (c) Google’s submission referenced statistics from consumer research commissioned for a separate CMA investigation, which it said showed that users can switch browser defaults with ease.⁶⁷⁵ However, the statistics cited by Google were based on the subset of users that indicated they had changed their default browser in the past (accounting for only 27% of Android respondents), which likely positively biases these statistics compared to the total population of users.

⁶⁶⁹ Google submitted that since we had not made available the underlying data, or reviewed transcripts or recordings of interviews with survey participants, the ‘probative value of the survey’ was undermined (Google’s written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 32. [Google.pdf](#)). We do not accept this. Google’s submission elides the consumer research and the consumer survey. In any event, the CMA took steps (in line with our standard practice) to ensure that both were robust, including commissioning an independent agency through a public procurement process, managing the process and observing samples of the qualitative interviews by way of quality assurance.

⁶⁷⁰ Furthermore, the consumer research is only one of multiple evidence sources presented that support this assessment.

⁶⁷¹ Google’s written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 31b. [Google.pdf](#).

⁶⁷² Specifically, by the point at which participants were asked about changing search engines, they had been answering questions and undertaking tasks about searching as they usually would on their device, for about 50 minutes.

⁶⁷³ Indeed, the consumer research report states that ‘most consumers were aware that they could change their default search engine’, which does not indicate confusion. Instead, it was the act of changing the search engine that participants lacked confidence in. See Thinks Insight & Strategy qualitative consumer research report, Exploring consumers’ search behaviour, paragraphs 5.18 and 5.19.

⁶⁷⁴ Google’s written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 31a. [Google.pdf](#).

⁶⁷⁵ Specifically, Google cited a statistic that 85% of users were confident in their ability to download a new browser and 77% of users were confident that they could change their default browser. Google’s written response dated 24 June 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 31c. [Google.pdf](#).

- (d) Finally, Google submitted that this evidence is contrary to its own ‘success on Windows PCs’, where Bing is the default.^{676, 677} Responding to a similar argument, in the US DoJ Search Litigation the judge found that Google’s success on Windows highlights that defaults are less effective when the alternative (here Google) has strong brand recognition and product quality. Even then, the judge found there is a strong default effect on users who retain the Edge browser on Windows (rather than switching to an alternative browser such as Chrome), as Bing receives 80% of these queries.⁶⁷⁸

Ability of others to compete for default positions

5.185 An important reason why defaults can act as a barrier to entry and expansion is because Google’s rivals have a limited ability to compete for default positions in general search. In particular:

- (a) Google’s total default payments made in relation to UK search traffic in 2024 were approximately [X] times greater than the payments made by Bing.⁶⁷⁹ Given the scale of Google’s default payments (see also paragraph 5.178), we disagree with Google’s assertion in response to our Proposed Decision that its default positions were awarded solely on the basis of ‘objectively superior quality’.⁶⁸⁰
- (b) A Microsoft internal document dated [X] states that Microsoft faces ‘significant obstacles in mobile distribution’ as their competitors (ie Google) ‘own the platform (and/or dominate thanks to default search agreements)’.⁶⁸¹ Microsoft submitted that there are significant obstacles to achieving distribution agreements with many OEMs and MNOs because [X].⁶⁸² Microsoft also submitted that it ‘[X]’.⁶⁸³
- (c) All smaller traditional general search providers told us that they struggle to compete for default placement.⁶⁸⁴

⁶⁷⁶ Google’s written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 31d. [Google.pdf](#).

⁶⁷⁷ Google also submitted that ‘the survey runs counter to real-world evidence that users can and do use their preferred search service, even if another one is initially set as the default’. See Google’s written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 31d. [Google.pdf](#). However, we consider this is inconsistent with evidence cited above.

⁶⁷⁸ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, paragraphs 70, 83 to 84 and pages 207 to 208. [pr24-59-Google.pdf](#).

⁶⁷⁹ Google’s consolidated response to the CMA’s RFI; Microsoft’s response to the CMA’s RFI.

⁶⁸⁰ Google’s written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 29a.

⁶⁸¹ Microsoft’s response to the CMA’s RFI.

⁶⁸² Microsoft’s response to the CMA’s RFI.

⁶⁸³ Microsoft’s response to the CMA’s RFI.

⁶⁸⁴ Responses to the CMA’s RFI.

- (d) OpenAI said that the payments made by Google to Apple are [REDACTED] that it makes it '[REDACTED]'.⁶⁸⁵ It also submitted that it has '[REDACTED]' despite continued attempts to do so, [REDACTED].⁶⁸⁶ It stated that [REDACTED].⁶⁸⁷
- (e) Perplexity submitted that it is developing a browser where the Perplexity answer engine will be the default because it is '[REDACTED]'.⁶⁸⁸ As noted in paragraph 5.175(c) above, Perplexity has been able to secure some agreements with OEMs and carriers, but Google restrictions mean that the effectiveness of these are limited. Perplexity said that 'Google's entrenched position' continues to be a 'significant structural barrier to entry'.⁶⁸⁹
- (f) In an email chain from 2020, Google executives said [REDACTED].⁶⁹⁰
- (g) In the US DoJ Search Litigation, the judge referenced Google analysis calculating what Microsoft would need to pay Apple to win the Safari default. This showed that Microsoft would have to pay Apple 122% of Bing's revenue share just to equal Google's revenue share.⁶⁹¹ Similarly, OpenAI's Nick Turley explained that OpenAI's distribution discussions with Android OEMs had stalled as the OEMs believed that OpenAI could not pay them as much as Google.⁶⁹²

Summary of evidence relating to default positions

- 5.186 In summary, the evidence shows that mobile devices and browsers are currently the most important access points to general search and Google is currently set or selected as the default on many of these access points both in the UK and globally. The choice of default is important to competition because consumers are likely to use the default they have chosen or which is set on their device. Google's rivals have a limited ability to compete for default positions in general search. As a result, defaults are an important barrier to accessing users and therefore an important barrier to entry and expansion to rivals of Google's general search products. Despite Google's submissions in response to our Proposed Decision, the evidence indicates that defaults also represent a barrier to entry and expansion for AI assistants.

⁶⁸⁵ OpenAI's response to the CMA's RFI.

⁶⁸⁶ OpenAI's response to the CMA's RFI.

⁶⁸⁷ OpenAI's response to the CMA's RFI.

⁶⁸⁸ Perplexity's response to the CMA's RFI.

⁶⁸⁹ Perplexity's response to the CMA's RFI.

⁶⁹⁰ Google's internal document.

⁶⁹¹ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, paragraph 328. [pr24-59-Google.pdf](#).

⁶⁹² *United States and State of Colorado v Google LLC*, Plaintiffs remedies post-trial brief of 21 May 2025, page 25. [gov.uscourts.dcd.223205.1358.0_3.pdf](#).

Data advantages

Introduction and Google's submissions

- 5.187 A variety of data sources are relevant to both general search (ie the user-facing products) and search advertising and, therefore, to general search services as a whole. Examples of such data are:
- (a) Search infrastructure data – data collected from crawling the web and from other sources (eg YouTube data) required to build web-indices and broader search infrastructure.
 - (b) Click-and-query data – data on consumer queries and activity (eg links they clicked on).
 - (c) Data from other products – user data collected from Google's ecosystem of products including volunteered data (data intentionally provided by the user), observed data (information recorded about the user and what they do) and inferred data (information derived or deduced from other data).
 - (d) Data on user behaviours on other websites and apps – user data collected from analytical tools such as Google Analytics for advertising verification, attribution and measurement of effectiveness.
- 5.188 Google receives far more queries than other traditional general search providers and AI assistants⁶⁹³ and, as described at paragraph 5.161 above, Google has a wider ecosystem of products. Consequently, Google has access to a significantly greater volume and variety of data than its rivals. Therefore, we have assessed whether and the extent to which these types of data sources are a barrier to entry and expansion in general search services.
- 5.189 Although Google acknowledged that its search algorithms use a variety of information (including from its wider ecosystem) to tailor organic search results,⁶⁹⁴ it also submitted that the role of data in the ability to show high quality search results to users is overstated.⁶⁹⁵ Google stated that data is subject to diminishing returns and that there are often other ways to improve relevance.⁶⁹⁶ To illustrate

⁶⁹³ In the [Online Platforms and Digital Advertising market study](#), July 2020 (DAMS), the CMA conducted a more detailed analysis of how these differences in scale meant that while Google observed many of Bing's infrequent 'tail' queries the opposite was not the case (paragraphs 3.68-3.73).

⁶⁹⁴ Google's response to the CMA's RFI.

⁶⁹⁵ Google's consolidated response to the CMA's RFI.

⁶⁹⁶ Google's consolidated response to the CMA's RFI. Google's submission to the CMA.

this Google presented the results of a 2022 study which reduced the amount of data used by its main ranking systems.^{697, 698, 699}

- 5.190 With regard to AI assistants, Google said that AI assistants do not need access to a large volume of click and query data to compete in search and that new entrants, such as [X], are able to innovate and compete on relevance for tail queries without access to click and query data. Google also said that ability to successfully answer ‘fresh’ queries depends primarily on identifying high-quality data sources, not data scale.⁷⁰⁰
- 5.191 In response to our Proposed Decision, Google submitted that we did not substantiate our provisional finding that Google’s access to data can act as a barrier to entry and expansion for Google’s rivals.⁷⁰¹
- 5.192 In relation to search advertising Google submitted that keyword matching is the most important signal in search advertising.⁷⁰² It also said that as a result the role of user data in targeting search adverts is limited.⁷⁰³ However, Google also submitted that where a user has consented to advert personalisation it may also use information about the user’s activity and demographic information to target adverts.⁷⁰⁴
- 5.193 Below we have considered:
- (a) Google’s use of data; and
 - (b) Third party evidence on the importance of data.

Google’s use of data

- 5.194 Despite Google’s submissions that the role of data is overstated, Google’s actions indicate the importance of a range of data to its general search services.
- 5.195 First, Google uses various types of data at different points when providing its general search services including:⁷⁰⁵

⁶⁹⁷ The experiment assessed two scenarios: ‘Low Mobile’ whereby data was reduced to 4.86% of Google’s total traffic and a ‘High Mobile’ scenario where data was reduced to 6.43% of Google’s traffic. Google’s submission to the CMA.

⁶⁹⁸ Google’s submission to the CMA.

⁶⁹⁹ In response to our Proposed Decision, Google submitted that the Proposed Decision does not ‘engage with the results’ of this study. We have considered these representations and set out our thinking regarding this study at paragraph 5.198 below. Google’s written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 33b. [Google.pdf](#).

⁷⁰⁰ Google’s submission to the CMA on AI-Powered Search Services.

⁷⁰¹ Google’s written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 33 [Google.pdf](#).

⁷⁰² Google’s response to the CMA’s RFI.

⁷⁰³ Google’s response to the CMA’s RFI.

⁷⁰⁴ Google’s response to the CMA’s RFI.

⁷⁰⁵ Google’s consolidated response to the CMA’s RFI discusses these different elements of providing Google’s general search service.

- (a) Crawling – user data allows Google to optimise its web crawling, eg by understanding which pages to crawl and the frequency with which to crawl those pages.⁷⁰⁶
- (b) Indexing – user data, particularly query data, plays a key role in determining what content is included in Google's index and where it is placed within it, with the index organised into tiers based on content freshness.⁷⁰⁷
- (c) Interpreting queries and identifying relevant results – Google must interpret queries (eg accounting for misspellings) and effectively match queries to results. To do this Google has developed a range of tools, such as RankBrain, BERT and MUM,⁷⁰⁸ and the development of these tools depends, in part, on the availability of data.⁷⁰⁹ During its oral representations on the Proposed Decision, Google also outlined how data from its signed-in users can help support personalisation of search query results.⁷¹⁰
- (d) [REDACTED].⁷¹¹
- (e) Advertising and monetisation – data allows Google to understand the effectiveness of different adverts, eg ensuring that irrelevant adverts are not shown.⁷¹² Google's wider ecosystem, in particular Google Analytics, also allows Google to provide advertisers with information regarding the performance of their advertisements.⁷¹³

5.196 Second, Google retains user data, with some data fields stored for up to 18 months. It incurs the costs of storing this data, demonstrating the value and importance of it to Google's general search services.⁷¹⁴

5.197 Third, Google's internal documents also indicate that data (including both the volume and variety of data) is (and will continue to be) important, which is consistent with Google's recent announcements (such as the launch of AI Mode) which acknowledge the importance of data, in particular from its wider ecosystem, and personalisation.⁷¹⁵

⁷⁰⁶ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, paragraph 91. [pr24-59-Google.pdf](#).

⁷⁰⁷ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, paragraph 92. [pr24-59-Google.pdf](#).

⁷⁰⁸ See [How AI powers great search results](#).

⁷⁰⁹ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, paragraphs 93, 97 and 98. [pr24-59-Google.pdf](#).

⁷¹⁰ Note of hearing with Google.

⁷¹¹ Google's internal document.

⁷¹² *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, page 230. [pr24-59-Google.pdf](#).

⁷¹³ See [Customer Analytics Tools and Insights - Google Ads](#).

⁷¹⁴ See [How Google retains data we collect – Privacy & Terms – Google](#); *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, paragraph 105. [pr24-59-Google.pdf](#).

⁷¹⁵ [AI Mode in Google Search: Updates from Google I/O 2025](#).

- (a) A 2018 document portrays a ‘virtuous cycle’ of increased scale: with ‘better results’ and ‘better result previews’ resulting in ‘happier users and more informed user interactions’. This in turn ‘improves the training data for models used in ranking and language understanding’. This results in ‘better models’ and improves results.⁷¹⁶
- (b) A Google document from 2024 sets out Google’s strategy for [REDACTED].⁷¹⁷
- (c) In a 2025 document outlining Google’s three-year search strategy for 2025 to 2027, Google says [REDACTED].^{718, 719}

5.198 Regarding Google’s 2022 experiment that reduced the amount of data used by its main ranking systems:⁷²⁰

- (a) Google submitted that this experiment shows that the wide difference in search quality between Google and Bing could not be explained solely by Google having access to a higher volume of data.^{721, 722} However, if access to data at scale were not a significant factor in search quality, one would expect Google to reduce its reliance on large-scale data in its live systems as a result of this experiment. The fact that Google continues to rely on full-scale data in its live systems suggests that access to large volumes of user data remains beneficial in delivering high-quality search results.
- (b) There are important limits on the extent to which the experiment can measure the effects of Google’s data advantages. For example, the experiment focused on retraining only a subset of ranking components – albeit those responsible for approximately 82% of ranking impact – and did not consider the role Google’s access to greater scale and data may have played in its ability to develop and refine those components in the first place. Moreover, the experiment focused narrowly on ranking quality and did not consider other areas of the search ecosystem where data scale may confer competitive advantages, such as web crawling, feature triggering (eg featured snippets) and monetisation. These broader uses of data are integral to the overall performance and commercial success of a search engine and were not captured within the scope of the experiment.

⁷¹⁶ [Trial Exhibit-UPX1115: U.S. and Plaintiff States v. Google LLC](#).

⁷¹⁷ Google’s internal document.

⁷¹⁸ Google’s internal document.

⁷¹⁹ Google’s internal document.

⁷²⁰ Google’s consolidated response to the CMA’s RFI.

⁷²¹ Google’s submission to the CMA.

⁷²² Google’s written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 33b. [Google.pdf](#).

Evidence from third parties

- 5.199 Third party evidence also consistently indicates that scale in data is important and a barrier to entry and expansion to compete with Google's general search services.
- (a) Microsoft said that greater scale, and click and query data, improves the relevance of results and the quality of the search engine and enables Google to serve more relevant adverts.⁷²³ It explained that Google's algorithms improve their accuracy and relevance as users undertake more queries (direct network effects) and a larger user base attracts more advertisers seeking to reach that audience (indirect network effects).⁷²⁴ [§].⁷²⁵
 - (b) Ecosia said that the scale and quality of data held by a search engine plays a 'vital' role in its ability to serve high quality search results and adverts.⁷²⁶ DuckDuckGo and Yahoo said that competing search engines face issues competing with Google, due to their smaller user base and lower amounts of data on what users are searching for and which results they find useful.⁷²⁷
- 5.200 In the US DoJ Search Litigation, it was also found that Google 'has used its scale advantage to improve the quality of its search product' and that at every stage of the search process 'user data is a critical input that directly improves quality'.⁷²⁸ The liability judgment also sets out how the magnitude of Google's query volume compared to rivals is 'startling'. For instance, users enter nine times more queries on Google than on all rivals combined, and this increases to 19 times on mobile devices. Furthermore, one of Google's core ranking models, NavBoost, runs on 13 months of Google's click-and-query data, which is equivalent to over 17 and a half years of Bing data.⁷²⁹
- 5.201 Google's advantage over competitors due to the scale of the data it holds was also reflected in the US Remedies trial – Memorandum Opinion, which described this as 'an insurmountable quality and monetization advantage'.⁷³⁰ The Memorandum highlighted the greater number of 'long-tail' queries Google receives compared to competitors, or queries that contain 'less common, more distinctive phrases'. Although these queries individually appear only rarely, they collectively account for

⁷²³ Microsoft's response to the CMA's RFI.

⁷²⁴ Microsoft's response to the CMA's RFI.

⁷²⁵ [§] In the US Search litigation, the judgement [§] identified discussions of the importance of data advantages from a Microsoft internal document. See: *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, page 231. [pr24-59-Google.pdf](#).

⁷²⁶ Ecosia's response to the CMA's RFI.

⁷²⁷ DuckDuckGo's response to the CMA's RFI. Yahoo's response to the CMA's RFI.

⁷²⁸ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, paragraph 90. [pr24-59-Google.pdf](#).

⁷²⁹ *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, page 230. [pr24-59-Google.pdf](#).

⁷³⁰ US Remedies trial – Memorandum Opinion, Page 129, 2 September 2025.

a 'significant' volume of search traffic. These queries provide Google with valuable data that helps them improve the quality of results they provide to all users, particularly in response to less frequently-received queries.^{731, 732}

- 5.202 Consistent with this, Brave, which has its own search infrastructure, said that data is important to build an index. Although, as submitted by Google, Brave now has its own search index, Brave also submitted that it took 15 years to achieve independence from third party indexes.⁷³³ Given the large time cost associated with Brave's index, we disagree that this is indicative that access to data is not a barrier to entry.
- 5.203 Yahoo explained that more user data helps providers to 'determine which sites to crawl, learn what users are looking for, understand user queries, and determine the order of results'.⁷³⁴
- 5.204 Despite Google's submissions, traditional general search providers also indicated that a variety of user data is important to compete in general search services. For example, [§] said that location data is important to improve the relevance of results and advertising shown to users.⁷³⁵ However the relevance of specific types of data may vary for certain competitors. For example, Yahoo said that click and query data is more important than location data for improving their service due to the small portion of location-relevant queries entered to their platform.⁷³⁶
- 5.205 AI assistants that view themselves as competitors of Google Search also said that Google's access to data acts as a barrier to entry.
- (a) OpenAI said to provide the most relevant results a competitive search service must have access to a wide range of online content and data to understand what users want. It said that Google has structural advantages in both these areas that competitors are unable to copy. OpenAI added that it, and other competitors to Google Search, [§].⁷³⁷
 - (b) Perplexity said the access to the technical expertise and finance required to build a high-quality web index and ranking system was a barrier to competitors, as well as the scale of Google's user data.⁷³⁸
- 5.206 AI assistant competitors including OpenAI, Perplexity, Apple and Meta have been reported as customers of a web scraping firm, SerpApi, that focusses on scraping

⁷³¹ US Remedies trial – Memorandum Opinion, Pages 90 and 131, 2 September 2025.

⁷³² To note the US Remedies trial – Memorandum Opinion did not grant all of the DoJ data remedy proposals. A more limited set of search index and user data will be supplied to competitors and no ads data will be provided.

⁷³³ Brave's response to the CMA's RFI.

⁷³⁴ Yahoo's response to the CMA's RFI.

⁷³⁵ [§] response to the CMA's RFI.

⁷³⁶ Yahoo's response to the CMA's RFI.

⁷³⁷ OpenAI's response to the CMA's RFI.

⁷³⁸ Perplexity's response to the CMA's RFI.

Google's search data to gain insight into Google's index.⁷³⁹ We consider this indicative of the value of Google's search data to these firms.

Summary on data advantages

- 5.207 Overall, the evidence summarised above shows that access to a variety of data is important in enabling Google to tailor its search results and in Google's provision of search advertising. This can act as a barrier to entry and expansion to Google's rivals since Google has access to significantly more data and a greater variety of data given its greater scale in general search and search advertising, and its wider ecosystem of products. Evidence from AI assistants that view themselves as competitors to Google Search indicates that these suppliers also view the scale of data to which Google has access as a barrier to entry and expansion.

Costs of search infrastructure

- 5.208 To provide a general search product to users, providers must either invest in or gain access to search infrastructure. As set out above, Google collects large amounts of data to compose its search indices and its search infrastructure and uses user data to optimise crawling to quickly and efficiently return search results to users. As a result of these efforts Google has developed a large web index, containing around [20-30] billion websites and hundreds of billions of webpages⁷⁴⁰ (Google's web index contained [500-600] billion webpages in 2019).⁷⁴¹
- 5.209 Both Google and Microsoft make very significant expenditures to maintain their search infrastructure:
- (a) Google submitted that the total cost of operating Search globally was approximately £[§] billion in 2024.⁷⁴² Of this we attribute £[§] billion to the maintenance of its search infrastructure based on the categorisations provided.⁷⁴³ This is composed of £[§] billion associated with 'Machine/Network' costs and £[§] billion of 'Direct Product Engineering Costs' categorised under Operating Expenses.⁷⁴⁴

⁷³⁹ The Information, 'OpenAI Is Challenging Google—While Using Its Search Data', August 2025, accessed by the CMA on 02 September 2025. [OpenAI Is Challenging Google—While Using Its Search Data — The Information](#).

⁷⁴⁰ Google's consolidated response to the CMA's RFI.

⁷⁴¹ [Online platforms and digital advertising market study](#), July 2020 (DAMS), Appendix I, paragraph 75. [Appendix I: search quality and economies of scale](#).

⁷⁴² Google's consolidated response to the CMA's RFI.

⁷⁴³ These categories have been selected to clearly represent the cost of maintenance of the search infrastructure and ensure comparability with equivalent submissions from other respondents, particularly Bing. The categories selected for Google may be excessively narrowly defined, with the costs of their search infrastructure maintenance potentially higher. The categories selected for Google exclude most costs associated with Search, including search advertising, the indirect costs attributed to Google Search and some further costs associated with their search infrastructure maintenance like Indirect Product Engineering costs. Even with this narrower definition Google's costs are significantly higher than any other search engine.

⁷⁴⁴ Analysis of Google's consolidated response to the CMA's RFI. Costs calculated as sum of 'Machine/Network Costs' and 'DirectEngPM costs'.

- (b) Microsoft submitted the total cost of operating Bing globally in 2024 was approximately £[REDACTED] billion. Of this we attribute £[REDACTED] billion to the maintenance of its search infrastructure based on the categorisations provided.⁷⁴⁵ This is composed of £[REDACTED] billion of 'Operating Expenses' and £[REDACTED] billion of 'Costs of Goods Sold'.⁷⁴⁶

5.210 The significance of these costs is illustrated by the fact that Bing is the only English-language provider to have developed search infrastructure which is comparable to Google's. As shown in the table below, all third parties, both traditional general search providers and AI assistants, which have developed their own search infrastructures have a web-index which is a fraction the size of Google's and Bing's and which costs a fraction of the sum spent by Google and Microsoft to maintain.

Figure 5.6 Web index size and search infrastructure maintenance costs for general search providers and AI assistants

Company	Web Index size (number of webpages)	2024 search infrastructure spend (GBP) ⁷⁴⁷
Google ⁷⁴⁸	'Hundreds of billions'	£[REDACTED] billion
Microsoft ⁷⁴⁹	[REDACTED] billion	£[REDACTED] billion
Mojeek ⁷⁵⁰	[REDACTED] billion	[< 1 million]
DuckDuckGo ⁷⁵¹	[<1 million]	-
[REDACTED] ⁷⁵²	[REDACTED]	[REDACTED]
Apple ⁷⁵³	Approximately [REDACTED] billion URLs indexed	Around [REDACTED]
OpenAI ⁷⁵⁴	[REDACTED] billion	[REDACTED] million
Perplexity ⁷⁵⁵	[REDACTED] billion	-

Source: Data submitted by parties.

5.211 The substantial cost involved in developing and maintaining search infrastructure is a significant barrier to entry and expansion for rivals. Consistent with this, several traditional general search providers [REDACTED] said that developing and

⁷⁴⁵ These categories have been selected as those most clearly representing the cost of maintenance of the search infrastructure and ensuring comparability with equivalent submissions from other respondents, however do include some costs within Operating Expenses that are excluded from Google's figures (eg sales and marketing, people costs).

⁷⁴⁶ Microsoft's response to the CMA's RFI.

⁷⁴⁷ 2024 investment figures were provided by Google, Microsoft, and Apple in USD. These figures have been converted to GBP using the Bank of England USD:GBP 2024 average spot exchange rate.

⁷⁴⁸ Google's web index contained 581 billion webpages in 2019. [Online platforms and digital advertising market study](#), July 2020 (DAMS), Appendix I, paragraph 75. [Appendix I: search quality and economies of scale](#). Google's consolidated response to the CMA's RFI and Analysis of Google's consolidated response to the CMA's RFI. Costs calculated as sum of 'Machine/Network Costs' and 'DirectEngPM costs'.

⁷⁴⁹ Microsoft's response to the CMA's RFI.

⁷⁵⁰ Mojeek's response to the CMA's RFI.

⁷⁵¹ DuckDuckGo's response to the CMA's RFI.

⁷⁵² [REDACTED] response to the CMA's RFI.

⁷⁵³ Apple's response to the CMA's RFI.

⁷⁵⁴ OpenAI's response to the CMA's RFI.

⁷⁵⁵ Perplexity's response to the CMA's RFI.

maintaining search infrastructure is a barrier to entry due to the large levels of financial requirements.⁷⁵⁶ [X] also said that it is unable to build a comparable web index to Google partly because of the richness of Google's index, which includes data from other sources like images, videos, maps and local data.⁷⁵⁷

- 5.212 Beyond these financial barriers, there are also technical barriers that competitors need to overcome in order to build their search infrastructure. Consistent with the CMA's findings in DAMS,⁷⁵⁸ Mojeek⁷⁵⁹ and OpenAI said that crawl restrictions which certain websites impose can act as a barrier to entry. OpenAI estimated that its index currently has approximately [X]% of the URLs and content contained in Google's results, and that a [X] proportion of this gap is due to [X].⁷⁶⁰ OpenAI also said that [X].⁷⁶¹
- 5.213 Website owners also engage in significant efforts to optimise their websites to be discoverable by Google.⁷⁶² Search engine optimisation (**SEO**) has become a large industry, with an estimated UK revenue of £22.3 billion in the last financial year (2024-25)⁷⁶³ and Google publishes a large amount of documentation on how to improve and monitor how websites appear on Google's general search products.⁷⁶⁴ By increasing website discoverability, SEO aligns the incentives between website owners and Google, enabling Google to harness its scale on the user side to more effectively crawl the web and build a high-quality index.
- 5.214 As a result of the financial and technical barriers associated with building and developing search infrastructure, most other traditional general search providers syndicate organic and/or paid-for search results from Google or Bing. These syndication agreements and their contractual terms also act as a barrier to these providers expanding and playing a more substantial role in competition for general search services.⁷⁶⁵ For example, [X]⁷⁶⁶ [X].⁷⁶⁷
- 5.215 In response to our Proposed Decision, Google stated that its data is not required to develop an index, highlighting that Brave and Perplexity have each developed

⁷⁵⁶ [X] responses to the CMA's RFI.

⁷⁵⁷ [X] response to the CMA's RFI.

⁷⁵⁸ [Online platforms and digital advertising market study](#), July 2020 (DAMS), pages 90 and 91.

⁷⁵⁹ Mojeek's response to the CMA's RFI.

⁷⁶⁰ OpenAI's response to the CMA's RFI.

⁷⁶¹ OpenAI's response to the CMA's RFI.

⁷⁶² Almost all [X] publishers, advertisers and SSPs said that they optimise their websites to be crawled and discoverable on Google Search. Responses to the CMA's RFI.

⁷⁶³ IBISWORLD, 'SEO & Internet Marketing Consultants in the UK – Market Research Report (2014-2029)', November 2024, accessed by the CMA on 03 April 2025. [SEO & Internet Marketing Consultants in the UK - Market Research Report \(2014-2029\)](#).

⁷⁶⁴ Google Search Central, 'Explore Google Search documentation to improve your sites SEO', undated, accessed by the CMA on 03 April 2024. [Documentation to Improve SEO | Google Search Central | Google for Developers](#).

⁷⁶⁵ Brave and Mojeek do not syndicate results from Google or Microsoft Bing but use their own search infrastructure to show results to users. Brave's response to the CMA's RFI; Mojeek's response to the CMA's RFI.

⁷⁶⁶ [X] response to the CMA's RFI.

⁷⁶⁷ [X] response to the CMA's RFI.

proprietary indexes.⁷⁶⁸ However, evidence from each of these third parties suggests that rivals nonetheless face barriers to developing a proprietary index of comparable quality to Google's.

- (a) As set out in paragraph 5.202, Brave submitted that it took 15 years to achieve independence from third party indexes.⁷⁶⁹ Given the large time cost associated with developing Brave's index, we disagree that this is indicative that rivals do not face barriers to developing their own indexes.
- (b) As set out in paragraph 5.205(b), Perplexity identified access to the technical expertise and finance required to build a high-quality web index and ranking system, as well as the scale of Google's user data, as barriers to competitors.⁷⁷⁰ Despite Google's submissions,⁷⁷¹ Perplexity submitted that the size of its search index does '[affect] the quality of Perplexity's answer engine results' and that '[a]s Perplexity's search index grows, the quality of its answers generally improves, as confirmed by human reviewers'.⁷⁷²

5.216 Overall, Google is the provider with the largest search infrastructure, which it spends a substantial amount of money to maintain. Competitors face a number of barriers in building and running search infrastructure, including both financial and technical barriers, which leads to them operating search infrastructure that is a fraction of the size of Google's.

Barriers to monetisation

- 5.217 To develop and maintain a competitive general search product, providers must be able to monetise their product effectively (eg to cover the costs of the search infrastructure described above). The primary means by which most existing providers monetise their products is advertising and specifically search advertising. The evidence indicates that there are a number of challenges which must be overcome, and which therefore act as a barrier to entry and expansion, to monetising effectively.
- 5.218 First, several third parties highlighted the importance of scale in general search (ie the user side) as a barrier to developing an effective search advertising product. In particular:

⁷⁶⁸ Google's written response dated 22 July 2025 to the consultation on Proposed Decision dated 24 June 2025, paragraph 33 [Google.pdf](#).

⁷⁶⁹ Brave's response to the CMA's RFI.

⁷⁷⁰ Perplexity's response to the CMA's RFI.

⁷⁷¹ Google submitted that 'Perplexity's CEO has confirmed that the size of an index does not matter'. Google's written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 33a. [Google.pdf](#).

⁷⁷² Perplexity's response to the CMA's RFI.

- (a) Brave explained that a lack of user scale meant they are not attractive to small advertisers.⁷⁷³
- (b) DuckDuckGo described a 'reinforcing feedback loop' where more users creates better results and attracts more advertisers, leading to greater revenue, enabling Google to buy more default positions which increases users on the platform.⁷⁷⁴
- (c) Ecosia said that advertisers will go where they can reach their target audience best, and that is Google and Microsoft given that their share in the online search market is >90%.⁷⁷⁵
- (d) Mojeek said that it had started to develop its own advertising platform, though its company size (at this time) and its below critical mass level of traffic presented barriers.⁷⁷⁶
- (e) As discussed for example at paragraph 5.124, advertisers indicated that scale is important and that providers' limited scale on the user side makes them less attractive alternatives to Google's search advertising.

5.219 This third-party evidence is consistent with statements in Google's internal documents (see paragraph 5.197(a)).

5.220 Second, third parties also indicated that Google's wider ecosystem provides Google with an advantage because data gathered through Google's wider analytics and analysis offerings provide Google with advantages in the measurement of search advertising effectiveness. Specifically:

- (a) Several [redacted] alternative traditional general search providers considered that limited interoperability of these products with their own search advertising presents barriers to the expansion of their offerings.⁷⁷⁷ In particular, Microsoft highlighted [redacted] Google's unmatched scale with respect to conversion information.⁷⁷⁸ Microsoft submitted that Google has developed SA360 to [redacted].⁷⁷⁹ Brave said that Google's ownership of attribution and analysis platforms such as Google Analytics and SA360 are a barrier to building its own search engine advertising product.⁷⁸⁰
- (b) Some businesses that advertise on Google [redacted] also cited Google's access to superior data drawn from its wider ecosystem relative to other providers

⁷⁷³ Brave's response to the CMA's RFI.

⁷⁷⁴ DuckDuckGo's response to the CMA's RFI.

⁷⁷⁵ Ecosia's response to the CMA's RFI.

⁷⁷⁶ Mojeek's response to the CMA's RFI.

⁷⁷⁷ See [redacted] responses to the CMA's RFI.

⁷⁷⁸ Microsoft's response to the CMA's RFI.

⁷⁷⁹ Microsoft's response to the CMA's RFI.

⁷⁸⁰ Brave's response to the CMA's RFI.

and also that the need for such data inhibited their ability to switch to rivals.⁷⁸¹

- 5.221 In summary, the evidence indicates that Google's rivals face a number of barriers to effectively monetising their products in order to compete with Google. In particular, the evidence highlights Google's significantly greater scale and the role of its wider ecosystem in providing data to advertisers.
- 5.222 As set out in paragraphs 5.145 to 5.153, we have also specifically considered the extent to which AI assistants are likely to compete with Google's search advertising in the next five years. It is currently unclear to what extent these suppliers will successfully develop to monetise effectively within this time frame.

Summary of barriers to entry and expansion

- 5.223 Overall, we found that there are a number of significant barriers to entry and expansion faced by competitors. In particular:
- (a) Google continues to hold significant default positions, especially in relation to Apple devices (including in the UK), Android devices in the US and the Chrome browser, that act as a significant barrier to expansion for rivals, by limiting their ability to access consumers, build their scale and grow into stronger competitors over time.
 - (b) Access to different sources of data, including search infrastructure data, click-and query data, and data from a wide ecosystem of products, continues to be an important factor affecting the ability of others to compete effectively with Google's general search services.
 - (c) The costs and technical requirements necessary to develop and maintain the infrastructure required to compete effectively with Google in general search services continue to be substantial. As a result, several traditional general search providers syndicate organic and/or paid-for results which limit their ability to expand.
 - (d) Competitors also face barriers to effectively monetise their general search products due to their limited reach on the user side which makes them less attractive alternatives to Google's search advertising.
 - (e) Google's extensive wider ecosystem is an important element of several of these barriers to entry and expansion. In particular, control of Chrome and Android provides Google with influence over some important access points

⁷⁸¹ See responses to the CMA's RFI.

and its wider set of products also provides it with access to data with which it can tailor its search products in ways that others cannot.

- 5.224 Several of these barriers to entry and expansion reflect the presence of network effects (for example see paragraphs 5.199 to 5.207, 5.213 and 5.218) whereby scale in one element of Google's general search services reinforces Google's position and acts as a barrier to entry and expansion for rivals. More specifically, the evidence shows that:
- (a) Scale in general search (the user side) provides access to data to improve the delivery of search results, making it easier to attract and retain those users.
 - (b) Scale in general search is a factor in attracting businesses to use Google's search advertising and therefore to effective monetisation. However, without effective monetisation it is difficult for providers to make the investments in search infrastructure needed to attract users.
- 5.225 Finally, given the recent growth in use of AI assistants we have specifically considered the extent to which they face the same barriers to entry and expansion that traditional general search providers face in general search services. The evidence indicates that access to users and default positions, scale of search infrastructure and sources of data are also important barriers to AI assistants:
- (a) Access to users and default positions – [X], Microsoft, and Perplexity [X] indicated that they struggle to negotiate comparable default positions to Google, and that the [X].⁷⁸²
 - (b) Scale of search infrastructure – although AI assistants have been increasing the proportion of responses they ground using search infrastructure, to do this more comprehensively and to develop a product with the potential to compete on a sustained basis they will need to develop their search infrastructure. Building a web-index comparable to Google's in coverage, size and quality in a reasonable time is extremely difficult and AI assistants have only been capable of building significantly smaller search infrastructure. As a result, OpenAI currently also relies on access to third party APIs, including Bing's, which it said is [X].⁷⁸³
 - (c) Access to a range of data – Google's access to many types of data is one of the reasons that explain the significant competitive advantage that Google has over OpenAI in relation to the size and quality of its search infrastructure.

⁷⁸² [X] response to the CMA's RFI. [X]. Perplexity's response to the CMA's RFI. Perplexity's response to the CMA's RFI. Microsoft's response to the CMA's RFI. Microsoft's response to the CMA's RFI.

⁷⁸³ OpenAI's response to the CMA's RFI.

Perplexity similarly identified the scale of Google's user data as a barrier to entry for competitors (see paragraph 5.205).⁷⁸⁴

5.226 Furthermore, there is evidence that access to data may become a more important barrier to entry and expansion over the next five years and, as a result, a more significant barrier for AI assistants. As discussed in paragraph 5.197(c), [X]. It follows that user data is likely to be an important input to be able to offer personalised general search services and that Google's wide ecosystem of products and services will be a significant competitive advantage over rivals, such as AI assistants, that do not have access to a wide range of data sources.

Profitability

5.227 This section summarises our analysis of profitability for both Alphabet Group (Google's parent company) and Google's general search services.⁷⁸⁵ Our analysis is set out in more detail in Appendix C.⁷⁸⁶

5.228 Since our SMS assessment relates to Google's market position in the UK, we are interested in the profitability of Google's UK general search services. However, to help inform this assessment we have started with global figures, recognising that the digital activities we are assessing are global in nature, and because Google did not provide information on the profitability of its general search services at a UK level.⁷⁸⁷ Our analysis is therefore based on global data from Google supplemented by information we obtained from Google to enable more detailed breakdowns and UK specific analysis where appropriate.

5.229 Our profitability analysis shows that, at the Group level, Google generates substantial profits and operating cashflows in absolute terms. As shown in Figure 5.7 below, Alphabet Group's earnings before income and tax (**EBIT**) have remained consistently high and the profit margin has been above 25% for each of the last four years.^{788 789}

⁷⁸⁴ Perplexity's response to the CMA's RFI.

⁷⁸⁵ See CMA194, paragraph 2.55(e).

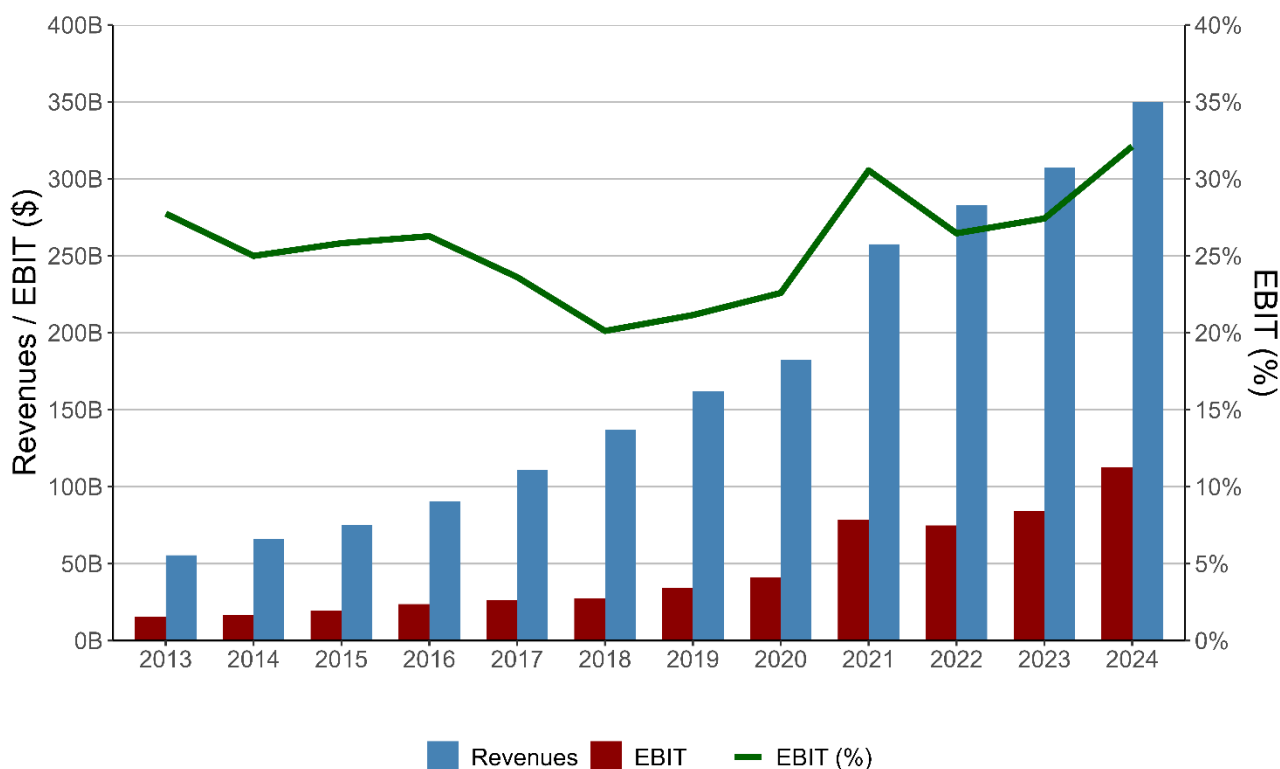
⁷⁸⁶ In response to our Proposed Decision, Google submitted that a finding of SEMP 'requires a rigorous assessment of constraints on the firm's ability to profitability sustain prices above competitive levels ... or ... degrade quality or innovation' (Google's written response dated 22 July 2025 to consultation on Proposed Decision Report dated 24 June 2025, paragraph 25. [Google.pdf](#)). For the avoidance of doubt, our findings are based on the evidence as a whole and taken in the round. As noted in the paragraph of the Guidance Google cited in support of this submission (2.55): 'Given the case-specific nature of the competitive dynamics and evidence, there is no exhaustive list of factors that need to be present in order to find that a firm has substantial market power'.

⁷⁸⁷ Google's consolidated response to the CMA's RFI.

⁷⁸⁸ CMA analysis of [Form 10-K for Alphabet INC filed 02/05/2025](#).

⁷⁸⁹ EBIT is based on Google's Income from Operations as reported in its Consolidated Statements of Income in published accounts. [Form 10-K for Alphabet INC filed 02/05/2025](#), page 53.

Figure 5.7 Alphabet Group Revenue and EBIT between 2015 and 2024



Source: CMA analysis of Alphabet Group 10k data⁷⁹⁰

5.230 Google's⁷⁹¹ profitability, when measured as a percentage return on capital employed (**ROCE**), is around 40%, compared with our estimate of Google's weighted average cost of capital (**WACC**) of [10-15]%, based on Google's own estimation of WACC for the Alphabet Group.⁷⁹² This profitability estimate remains high even when adopting a conservative sensitivity analysis, for example in relation to intangible assets.⁷⁹³

5.231 We have also found that Google has for many years been making higher operating profit margins from its general search services than for its overall business:

- (a) The Google Search & Other revenue reporting segment was the largest contributor to Google's global revenues, with reported revenues of \$198 billion for the financial year ending 31 December 2024.⁷⁹⁴

⁷⁹⁰ [Form 10-K for Alphabet INC filed 02/05/2025.](#)

⁷⁹¹ We have considered the profitability both of the Alphabet Group and the Google Services segment, which is the reporting segment that Google's general search services are part of.

⁷⁹² We estimate that Google has been able to generate an average ROCE of 38% over the last ten years, and that this has been trending higher in the last few years. Our analysis is set out in more detail in Appendix C.

⁷⁹³ For example, we have conducted a sensitivity analysis to our ROCE based profitability analysis to test the sensitivity of our profitability findings to changes in intangible assets relating to Google's R&D expenditure.

⁷⁹⁴ Revenues disaggregated by type, as presented on page 88 of [Form 10-K for Alphabet INC filed 02/05/2025.](#)

- (b) This segment includes the Google Search business, which is made up of Google's revenue-generating 'Search Ads' business and its free 'Search Organic' business'.⁷⁹⁵
- (c) Google Search generated global revenues and operating profit of \$[X] billion and \$[X] billion in the financial year ending 31 December 2024,⁷⁹⁶ and UK revenues of \$[X] billion (£[10-20] billion).^{797, 798} Its global operating profit margin of [X]%^{799, 800} is high compared to 40%⁸⁰¹ for the overall Google Services segment and 32%⁸⁰² for the total Alphabet Group.⁸⁰³

- 5.232 Taking into consideration that Google's operating profit margins for its general search services are higher than for its business as a whole, we consider Google's general search services are at least as profitable as the Alphabet Group.
- 5.233 Given the global nature of Google's cost reporting structures, and having seen no evidence that Google's UK general search services have materially higher operating costs [X],⁸⁰⁴ we estimate that Google's UK general search services are generating economic profits over and above Google's cost of capital.
- 5.234 We estimate that this high return means that Google was able to earn at least £3-4 billion of profits in 2024 from its UK general search services over and above a return based on Google's estimate of the weighted average cost of capital for the Alphabet Group of [10-15]%.⁸⁰⁵
- 5.235 Based on our review of Google's own financial projections relating to future revenues and profitability, we have seen no evidence that these high levels of profitability would not continue.

⁷⁹⁵ Google's consolidated response to the CMA's RFI.

⁷⁹⁶ Google's consolidated response to the CMA's RFI. Google's stated global revenue and operating figures include other, smaller, O&O properties (eg Shopping, Gmail, Travel) as per the categories reported in Google's 10-K, as well as AdSense relating to search advertising.

⁷⁹⁷ Figure converted from GBP to USD the UK Office for National Statistics' average exchange rate for USD vs GBP of 1.2783 for the period from 1 January 2024 to 31 December 2024.

⁷⁹⁸ Revenue figure based on Google's own accounting methodology for segmental reporting, determined on the addresses of its customers. This figure differs from the CMA's estimate of UK revenues generated based on UK users (clicks by users) rather than a customer's registered address or billing address.

⁷⁹⁹ Google's consolidated response to the CMA's RFI.

⁸⁰⁰ Google's consolidated response to the CMA's RFI.

⁸⁰¹ CMA analysis of segment results on page 88 of [Form 10-K for Alphabet INC filed 02/05/2025](#).

⁸⁰² CMA analysis of segment results on page 88 of [Form 10-K for Alphabet INC filed 02/05/2025](#).

⁸⁰³ Google told us that this [X]. Google's consolidated response to the CMA's RFI.

⁸⁰⁴ [X].

⁸⁰⁵ CMA analysis using: Google's consolidated response to the CMA's RFI and Google's consolidated response to the CMA's RFI; and Alphabet Inc.'s consolidated financial statements, which can be found on pages 48-91 of [Form 10-K for Alphabet INC filed 02/05/2025](#).

Regulatory and other developments

- 5.236 In the sections above, we have considered the scope for market developments, including emerging technology, innovation and new entrants, to affect Google's provision of general search services over at least the next five years.
- 5.237 In this section, we consider the scope for other developments – in particular, legislation, regulatory action and litigation – to affect Google's market power in general search services over the same timeframe.⁸⁰⁶
- 5.238 Google has significant global operations and it is not possible to anticipate every such development; however, we have set out below the regulatory and other developments (both within the UK and internationally) that we consider have the most potential relevance to our assessment of whether Google has substantial and entrenched market power in general search services.

Developments in the UK

- 5.239 Within the UK:
- (a) the CMA has published a proposed decision to designate Google as having SMS in relation to the provision of mobile ecosystem services (the **Mobile SMS Investigation**);
 - (b) Google is also currently the subject of an ongoing CMA investigation under the Competition Act 1998 into whether it has abused a dominant position through its conduct in ad tech (the **CA98 Investigation**);
 - (c) collective proceedings claims have been brought in the Competition Appeal Tribunal against Google in relation to its general search services;⁸⁰⁷ and
 - (d) the UK government consulted in early 2025 on how it can ensure the UK's legal framework for AI and copyright supports UK creative industries and the AI sector.⁸⁰⁸

⁸⁰⁶ CMA194, paragraph 2.59.

⁸⁰⁷ Including *Nikki Stopford v Alphabet Inc, Google LLC, Google Ireland Limited and Google UK Limited* (Case No: 1606/7/7/23) (which alleges that Google has abused its dominant position in the online search market and certain adjacent markets concerning mobile device functionality); *Or Brook Class Representative Limited v Google Inc & Others* (Case No: 1720/7/7/25) (which alleges that Google has abused its dominant position in general search and search advertising to overcharge advertisers and exclude competitors, resulting in supra-competitive advertising prices); *Mr Roger Kaye KC v Alphabet Inc & Others* (Case No: 1733/7/7/25) (which alleges that Google has abused its dominant position in search advertising, resulting in inflated costs and reduced competition); and the Google Shopping Proceedings (Case Nos: 1424/5/7/21 (T); 1589/5/7/23 (T); 1596/5/7/23; and 1636/5/7/24) (which allege that Google abused its dominant position in general search to prevent, restrict or distort competition on the comparison shopping market).

⁸⁰⁸ [Copyright and Artificial Intelligence - GOV.UK](#). The consultation, which ran between 17 December 2024 and 25 February 2025, sought views on potential interventions which would (i) support right holders' control of their content and ability to be remunerated for its use; (ii) support the development of world-leading AI models in the UK by ensuring wide and lawful access to high-quality data; and (iii) promote greater trust and transparency between the sectors.

5.240 We do not consider that any of these developments is likely to be sufficient in scope, timeliness and impact to eliminate Google's market power in general search services in at least the next five years. In particular:

- (a) each of the Mobile SMS Investigation and the CA98 Investigation concerns activities that, although related (eg mobile devices and browsers are an important access point for Google's general search services), are separate from Google's general search services; and
- (b) moreover, the outcome of each of these developments is uncertain, since:
 - (i) the CMA has not yet reached a decision on whether to designate Google as having SMS, or to impose any interventions, in the Mobile SMS Investigation;
 - (ii) the CA98 Investigation is ongoing⁸⁰⁹ and no decision has been made as to whether Google has committed an infringement or, if so, what action the CMA should take;
 - (iii) at the time of this Decision there can be no certainty as to the outcome of the collective proceedings claims (both in terms of whether the claims will succeed and what, if any, remedies may be ordered); and
 - (iv) the UK government has not yet published its response to the copyright and AI consultation.

International developments

5.241 In addition to developments within the UK, the following are taking place internationally:

- (a) Alphabet Inc., together with its subsidiaries, has been designated as a 'gatekeeper' under the EU's Digital Markets Act⁸¹⁰ (the DMA) in respect of certain 'core platform services', including its online search engine (Google Search) and its online advertising services (which include Google Ads, SA360 and AdSense for Search)⁸¹¹ and is therefore subject to certain obligations;⁸¹²

⁸⁰⁹ In September 2024, the CMA issued a statement of objections provisionally finding that Google had abused its dominance by 'self-preferencing' its own ad exchange ([CMA objects to Google's ad tech practices in bid to help UK advertisers and publishers - GOV.UK](#)). The CMA is considering Google's representations on the Statement of Objections.

⁸¹⁰ Regulation (EU) 2022/1925 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828 (Digital Markets Act) [2022] L 265/1.

⁸¹¹ European Commission decision of 5 September 2023 addressed to Alphabet Inc.

⁸¹² The prohibitions and obligations for gatekeepers are set out in Articles 5, 6 and 7 of the DMA. Google's obligations include: (i) allowing third parties to interoperate with Google's services; (ii) allowing business users to access data

- (b) The US District Court for the District of Columbia has issued its opinions in relation to both liability and remedies in the US DoJ Search Litigation – in the latter, published in September 2025, the court declined to grant the structural remedies requested by the DoJ, but decided (subject to directing the parties to submit proposals for a final judgment implementing its opinion) to grant a range of behavioural remedies, including (i) prohibition on exclusive arrangements for default status; (ii) search index and user data-sharing obligations; (iii) search and search text ads syndication obligations; and (iv) ad auctions transparency obligations;⁸¹³
- (c) In September 2025, the European Commission announced its decision to fine Google €2.95 billion for abuses of dominance in online advertising technology markets, and the European Commission has given Google 60 days to propose measures to resolve ‘its inherent conflicts of interest’ along the ‘ad tech’ supply chain;⁸¹⁴
- (d) Remedies are now being considered after Google was found to have violated antitrust law in the US in relation to the open-web display publisher ad server market and the open-web display ad exchange market in another case brought by the federal and certain state governments;⁸¹⁵
- (e) Google has been designated by the JFTC as a specified software operator under Japan’s Mobile Software Competition Act⁸¹⁶ and will be subject to certain prohibitions and obligations in relation to the provision of smartphone software;⁸¹⁷ and
- (f) In April 2025, the JFTC issued a cease-and-desist order to Google under its Antimonopoly Act in relation to Google’s default agreements with Android

generated by using Google’s services; (iii) providing companies advertising on Google’s platform with the tools and information necessary to allow them to carry out their own independent verification of Google’s advertisements; (iv) allowing business users to promote their offer and conclude contracts with their customers outside of Google’s platform; (v) not treating Google’s products and services more favourably in ranking than similar third party services or products; (vi) not preventing consumers from linking up to businesses outside Google’s platforms; (vii) not preventing users from uninstalling any pre-installed software or app; and (viii) not tracking end users outside of Google’s core platform services for the purpose of targeted advertising, without effective consent having been granted.

⁸¹³ *United States and State of Colorado vs Google LLC*, Memorandum Opinion of 2 September 2025. [Memorandum & Opinion – #1436 in United States v. GOOGLE LLC \(D.D.C., 1:20-cv-03010\) – CourtListener.com](#). The parties submitted their proposed final judgments on 17 September 2025 (see below).

⁸¹⁴ European Commission case AT.40670 ‘Google - Adtech and Data-related practices’, press release dated 5 September 2025. [https://ec.europa.eu/commission/presscorner/detail/en/ip_25_1992]; [<https://competition-cases.ec.europa.eu/cases/AT.40670>].

⁸¹⁵ *United States of America, et al v Google LLC* Case 23-cv-108 (LMB/JFA). [united-states-of-america-et-al-v-google-llc-memorandum-opinion-2025.pdf](#).

⁸¹⁶ Act on Promotion of Competition for Specified Smartphone Software (Act No. 58 of 2024), which is due to come into full effect on 18 December 2025. <https://www.jftc.go.jp/en/pressreleases/yearly-2025/July/250729.html>.

⁸¹⁷ Google’s designation specifically relates to its basic operation software, app store, browser and search engine: [Designation of Specified Software Operators under the Act on Promotion of Competition for Specified Smartphone Software | Japan Fair Trade Commission](#).

OEMs; the order requires that Google put an end to requiring pre-installation and prominent featuring of its search services on Android smartphones.⁸¹⁸

5.242 We do not consider that any of these developments is likely to be sufficient in scope, timeliness and impact to eliminate Google's market power in general search services in the UK in at least the next five years. In particular:

(a) in relation to the DMA:

- (i) the effect of Google's obligations under the DMA on its provision of general search services in the UK is unclear, since the territorial reach of the DMA does not extend to the UK.⁸¹⁹ Google may therefore carve out the UK from any response to the DMA requirements, resulting in different compliance measures or solutions in the UK from those offered in the EEA;
- (ii) even if Google were to extend its responses to the DMA to the UK voluntarily, these obligations do not seek to eliminate Google's market power directly. Instead, they seek to ensure that the sectors in which its core platform services operate are, and remain, contestable (ie undertakings are able to overcome barriers to entry and challenge Google on the merits of their services) and fair (ie others can capture fully the benefits of their own contributions);⁸²⁰ and
- (iii) there remains some uncertainty as to the nature of Google's obligations under the DMA, since the European Commission has made preliminary findings that Alphabet failed to comply in certain respects, because certain features and functionalities of Google Search would treat Alphabet's own services more favourably compared to rival ones. The outcome of these proceedings remains uncertain;⁸²¹

(b) in relation to the European Commission's 'ad tech' decision:

- (i) Google has not yet responded with its proposal to address the conflicts of interest found. Therefore, we cannot anticipate the extent to which the decision will affect the UK; and

⁸¹⁸ JFTC press release, 'JFTC Issues a Cease and Desist Order to Google LLC':

<https://www.jftc.go.jp/en/pressreleases/yearly-2025/April/250415.html>.

⁸¹⁹ The DMA applies to core platform services 'provided or offered by gatekeepers to business users established in the [European] Union or end users established or located in the [European Union]' (Article 1(2)).

⁸²⁰ DMA, recitals (11), (27), (32) and (33).

⁸²¹ European Commission's Press Release, Commission sends preliminary findings to Alphabet under the Digital Markets Act, 19 March 2025. [Press corner | European Commission](#).

- (ii) Google has indicated that it will appeal the European Commission's findings,⁸²² which could delay implementation of any remedies that would affect the UK;
- (c) in relation to the US antitrust cases:
 - (i) the court's remedies opinion in the US DoJ Search Litigation makes no express provision for remedies to extend beyond the US⁸²³ and the parties' proposed 'final judgments', filed on 17 September 2025, focus their proposals on the US.⁸²⁴ The court has yet to make a final order imposing remedies;
 - (ii) the second US litigation relates to Google's online display advertising services, which are distinct from Google's general search services and at the time of this Decision, there can be no certainty as to the nature, scope⁸²⁵ or impact of any remedies to be imposed; and
 - (iii) Google has publicly indicated that it intends to appeal on liability in both cases;⁸²⁶
- (d) in relation to Japan's Mobile Software Competition Act and recent cease-and-desist order:
 - (i) the effect of Google's obligations on its provision of general search services in the UK is unclear, since Google may carve the UK out of any response to the requirements under the legislation or the cease-and-desist order, resulting in different compliance measures or solutions in the UK from those offered in Japan; and
 - (ii) even if Google were to extend its responses to the UK voluntarily, the obligations and prohibitions provided for in Japan that relate to search will focus on Google's search offering to 'smartphone users' and users

⁸²² <https://www.bbc.co.uk/news/articles/c1wqn3lre14o> (where the BBC states that 'Google told the BBC the Commission's decision was 'wrong' and it would appeal').

⁸²³ Whilst the court's remedies opinion does not explicitly limit the scope of remedies to the US, the court notes that all parties agree that the relevant geographic market is the US, and notes during its discussion of the DOJ's requested structural remedies that divestments would reach beyond US markets; that divestiture of Chrome would '[exceed] the proper scope of relief'; and that a forced sale of Android 'does not fit the wrong' the court is seeking to redress: see *United States and State of Colorado vs Google LLC*, Memorandum Opinion of 2 September 2025, pages 116 and 119. [Memorandum & Opinion – #1436 in United States v. GOOGLE LLC \(D.D.C., 1:20-cv-03010\) – CourtListener.com](#)

⁸²⁴ For example, both the DOJ's and Google's proposed final judgments define 'Competitor' by reference to the provision of a general search engine, search text ads or a GenAI product 'in the United States' and 'User-side Data' by reference to 'users in the United States' ([Microsoft Word - 2025 09 17 Plaintiffs FPFJ \(500pm FINAL\)](#), pages 31 and 35; and [gov.uscourts.dcd.223205.1443.2_1.pdf](#), pages 28 and 32).

⁸²⁵ Including the extent to which they will apply in the UK.

⁸²⁶ See, for example, Google's articles 'Our remedies proposal in DOJ's search distribution case': <https://blog.google/outreach-initiatives/public-policy/google-remedies-proposal-dec-2024/>; 'Read our statement on today's decision in the case involving Google Search': [Google's statement on Sept 2025 Search DOJ decision](#) and 'DOJ's remedies go significantly beyond the Court's ruling and would harm publishers and advertisers' [Google's statement on DOJ proposed remedies in ad tech case](#).

of Android devices rather than all of Google's general search services.⁸²⁷

Conclusion on regulatory and other developments

- 5.243 On the basis of the available evidence, we find that although regulatory developments may affect Google's conduct in carrying out general search services, they are not likely (whether individually, in aggregate or in combination with the other developments we have considered) to be sufficient in scope, timeliness and impact to eliminate Google's market power in general search services in at least the next five years.

Our conclusion on whether Google has substantial and entrenched market power in general search services

- 5.244 In the preceding sections we have presented the key points of evidence in relation to our assessment of whether Google has substantial and entrenched market power in general search services. In this section we present our overall assessment and conclusion based on that evidence. In doing so and in line with our guidance, we have first assessed whether Google has substantial market power in general search services and then, if we find that this is the case, whether Google's substantial market power is entrenched, taking into account expected or foreseeable developments over at least the next five years.⁸²⁸
- 5.245 Google currently has, and has persistently had, a strong position in general search facing limited competition.
- 5.246 Google has accounted for a share of supply amongst traditional general search providers of over 90% in the UK for at least 15 years.⁸²⁹ Other traditional general search providers are significantly smaller than Google and have been for many years. Bing is the largest of these providers but its current share of queries is approximately [0-5]% and the evidence shows that it is only a limited alternative to Google's general search products.⁸³⁰ No traditional general search providers have materially grown relative to Google for at least 15 years. Of the traditional general search engines that rely on organic syndication to provide general search results, most currently use Bing's syndication products rather than Google's. However, the overall share of general search queries accounted for by syndication partners is very small (less than 3%).

⁸²⁷ See, for example, the final guidelines on the Mobile Smartphone Competition Act published by the Japan Fair Trade Commission in July 2025: https://www.jftc.go.jp/file/MSCA_Guidelines_tentative_translation.pdf.

⁸²⁸ CMA194, paragraphs 2.54 and 2.56-2.62.

⁸²⁹ See paragraph 5.24 for data based on total queries to traditional general search providers since 2018 and [Online platforms and digital advertising market study](#), July 2020 (DAMS), Figure 3.3 for a longer time-series based on page referrals to 2009.

⁸³⁰ See paragraphs 5.32-5.43.

- 5.247 Google submitted that it experiences ‘indirect competitive constraints’ to its general search services from the ‘many alternative means through which users can search for and find information online’.⁸³¹ However, both specialised search providers and social media platforms have important functional differences which limit the extent to which they are an alternative to Google’s general search products. Specialised search providers can only respond to queries on specific topics and social media platforms currently focus on providing information based on the content provided to them. This contrasts to Google’s ability to provide information in response to a wide range of queries using a range of sources including information from the world wide web.
- 5.248 Consequently, while specialised search providers and social media platforms may be alternatives to Google’s general search in some circumstances, these circumstances are limited, and this is reflected in the range of evidence described at paragraphs 5.68 to 5.82 for specialised search providers and 5.82 to 5.88 for social media platforms.
- 5.249 Recent advances have enabled the emergence of AI assistants which provide new ways for users to interact with products including general search. Overall use of these AI assistants, and particularly ChatGPT, has grown quickly. For example, in June 2025 ChatGPT received over [1-2] billion queries in the UK.⁸³²
- 5.250 Some users are using AI assistants rather than Google’s general search and ChatGPT and Perplexity in particular have intentions to compete with Google’s general search products (see paragraphs 5.58 and 5.60). Google is [✂] (paragraph 5.39 and 5.40). However, AI assistants have a wide range of possible uses, only some of which overlap with those of Google’s general search products (for example paragraphs 5.50, 5.54 and 5.55). Use of AI assistants (and especially AI assistants other than ChatGPT) for search-grounded AI queries⁸³³ is, at this stage, low compared to use of Google’s general search products.⁸³⁴ Therefore, although some AI assistants are an emerging competitive threat to Google’s general search products, given the early stage in the development of these products, there is significant uncertainty as to how use of these products will evolve⁸³⁵ and whether they will become a sustained and significant competitive threat to Google’s general search products (paragraphs 5.50 and 5.51). We have further considered the emerging competitive threat from AI assistants as part of our forward-looking assessment below.

⁸³¹ Google’s consolidated response to the CMA’s RFI.

⁸³² OpenAI’s response to the CMA’s RFI.

⁸³³ As outlined at paragraph 5.29 above, we consider that these queries represent use cases for AI assistants that most closely resemble those for Google’s general search products.

⁸³⁴ As explained at paragraph 5.30 search-grounded AI queries are currently approximately [0-5]% of the volume of Google Search queries.

⁸³⁵ Google has also recognised the early stage of the development of AI assistants stating that generative AI ‘is a nascent space at an early stage of development and adoption’: Google’s consolidated response to the CMA’s RFI.

- 5.251 Similarly, Google's search advertising currently has, and has persistently had, a strong position facing limited competitive constraints.
- 5.252 As with general search, other traditional general search providers are significantly smaller than Google in search advertising and this has been the case for many years. Google has accounted for over [90-100]% of UK search advertising by traditional general search providers since at least 2015⁸³⁶ and Google has continued to grow its real search advertising revenues throughout this period.⁸³⁷ Microsoft's Bing is the best alternative to Google's search advertising, but it currently exerts a limited competitive constraint (paragraphs 5.123 to 5.127). In particular, Bing's significantly smaller scale in general search substantially limits the extent to which Microsoft can attract advertisers and hence compete with Google for search advertising budgets. Consequently, we have found that alternative traditional search providers are at most a limited competitive constraint on Google's search advertising.
- 5.253 Google has submitted that specialised search providers are also an alternative to its search advertising.⁸³⁸ There is some evidence of specialised search providers, particularly Amazon, being an alternative to Google's search advertising (see paragraphs 5.133 and 5.134). However, overall the evidence shows that specialised search providers are a limited alternative to Google's search advertising because:
- (a) Specialised search providers only focus on specific sectors meaning that they are not a viable alternative for many advertisers (paragraph 5.130);
 - (b) Even where a specialised search provider could be an option, many third parties did not view them as an alternative to Google's search advertising, eg because of their more limited reach, and some viewed specialised search providers as complementary to Google's search advertising (paragraph 5.131 and 5.133);
 - (c) [REDACTED] (paragraph 5.134). [REDACTED] (paragraph 5.135).
 - (d) The overall evidence did not indicate that Google faces materially stronger competition in relation to shopping adverts (where it is plausible that specialised search providers are a better alternative) than in relation to search advertising generally (paragraphs 5.138 to 5.141).

⁸³⁶ See paragraph 5.116 for data from 2015-2024.

⁸³⁷ See paragraph 5.121, where we discuss how Google's real cost-per-click declined between 2017 and 2024 and how it is unclear what conclusions can be drawn from this observation.

⁸³⁸ Google's consolidated response to the CMA's RFI.

- 5.254 Google also submitted that social media platforms are an alternative to its search advertising.⁸³⁹ The evidence shows that display advertising (which includes social media platforms) is not an effective alternative to Google's search advertising. In particular, many third parties indicated that it was not directly substitutable for Google's search advertising with some indicating that it could be complementary. This is consistent with Google's internal documents [REDACTED] (paragraph 5.143(d)).
- 5.255 Finally, at this stage AI assistants do not offer advertising to a meaningful extent and therefore are not currently an alternative to Google's search advertising. We have further considered the potential for AI assistants to become alternatives to Google's search advertising as part of our forward-looking assessment below.
- 5.256 An important factor in the persistence of the strong position of Google's general search and search advertising is the existence of a number of significant barriers to entry and expansion. In particular:
- (a) Google's extensive wider ecosystem provides it with access to data with which it can tailor its search products in ways that others cannot (paragraph 5.161 and 5.188). This wider ecosystem (in particular control of Chrome and Android) provides Google with influence over important access points to users (paragraph 5.173).
 - (b) Google continues to hold significant default positions, especially in relation to Apple devices (including in the UK), as a result of significant payments to Apple that Google has been willing and able to make over many years while continuing to be highly profitable. Google continues to hold significant default positions also on Android devices in the US and the Chrome browser on desktop devices. In cases where users are presented with a choice regarding their default, the data indicates that Google continues to be overwhelmingly set as the default. These factors significantly affect the ability of alternatives to access users and to achieve scale (see paragraphs 5.169 to 5.183).
 - (c) Access to different sources of data, including search infrastructure data, click-and query data, and data from a wider ecosystem of products, continues to be an important factor affecting the ability of others to compete effectively with Google's general search services (see paragraphs 5.194 to 5.207).
 - (d) Competitors face a number of barriers in building and running search infrastructure, including both financial and technical barriers. As a result, only a few of them operate search infrastructure, and theirs is a fraction of the size

⁸³⁹ This represents an indicative subset of the full competitors listed by Google in this category. The full list of competitors in this category is set out in Google's consolidated response to the CMA's RFI.

of Google's, while most traditional general search providers syndicate organic results and/or search advertising which limits their ability to expand (see paragraphs 5.208 to 5.215).

- (e) Competitors also face barriers to effectively monetise their general search products due to their limited reach on the user side which make them less attractive alternatives to Google's search advertising (paragraphs 5.217 to 5.221).

- 5.257 Furthermore, Google's strong positions in each of general search and search advertising reinforce one another (paragraph 5.224). In particular, attracting more users of general search provides Google with scale which attracts advertisers to its search advertising. More users and advertisers provide Google with more data with which to refine its organic search results and to target adverts. This improves Google's ability to monetise its general search services, which then allows Google to make investments, eg in search infrastructure and payments for default status to search access point owners such as Apple. These investments then allow Google to maintain scale, creating a virtuous cycle. As a result, we found that Google was able to earn at least £3-4 billion of profits in 2024 from its UK general search services over and above a return based on Google's estimate of the WACC for the Alphabet Group of [10-15]%.⁸⁴⁰
- 5.258 Overall, we have found that the combination of the currently strong position of Google's general search and search advertising and the way in which these positions reinforce each other means that Google has a position of **substantial market power** in respect of general search services.
- 5.259 The persistence of the position of Google's general search services and the scale of the barriers to entry and expansion described above are consistent with Google having entrenched market power in respect of general search services. In this context, significant changes in the competitive dynamics would be required to eliminate Google's substantial market power in general search services in the next five years. Therefore, we have considered whether there are any expected or foreseeable developments likely to lead to such an outcome.
- 5.260 We have found that, although there are a number of ongoing and potential regulatory developments relating to Google's general search services around the world, their future impact on Google's general search services in the UK is highly uncertain (paragraphs 5.236 to 5.243).
- 5.261 As we have described above, Google is responding to the emerging competitive threat to its general search services from some AI assistants. However, at this

⁸⁴⁰ CMA analysis of: Google's consolidated response to the CMA's RFI; Google's consolidated response to the CMA's RFI; and Alphabet Inc.'s consolidated financial statements, which can be found on pages 48-91 of [Form 10-K for Alphabet INC filed 02/05/2025](#).

stage use of AI assistants for search-grounded AI queries is low compared to use of Google's general search products. Furthermore, the future development of AI assistants for general search and search advertising remains unclear. For example, it is currently uncertain which use cases will be adopted and whether AI assistants will be adopted by a wide range of users. It is also currently unclear how AI assistants will monetise any alternatives to Google's general search services and indeed whether they will be able to successfully do so. Therefore, the degree to which AI assistants will develop into a sustained, effective alternative to Google's general search services is highly uncertain.

- 5.262 Furthermore, Google is well-positioned to respond to developments in AI to maintain its market position and to ensure that AI assistants do not develop into a more sustained and significant competitive constraint to its general search services. Indeed, developments in generative AI could also strengthen Google's position. Google is able to incorporate generative AI features (such as AI Overviews and AI Mode) directly into its existing products which users are already familiar with using. This contrasts with AI assistants which must encourage users to switch to their products. For example, Google's AI Overviews are displayed in response to more queries in the UK than queries ChatGPT received.⁸⁴¹
- 5.263 AI assistants must also overcome many of the barriers to entry which apply to traditional general search providers if they are to become an effective alternative to Google. In particular, AI assistants will need to incur the costs of developing and maintaining the necessary infrastructure, and face similar barriers to distribution and volume and range of data and therefore similar challenges to achieving scale. Further, increasing personalisation of search products ([X]) may affect the ability of AI assistants to grow for general search use cases given the narrow ecosystem of products that these providers have compared to Google.
- 5.264 Additionally, if substantial numbers of users begin to use AI assistants for general search use cases, then Google has also developed the Gemini AI assistant which can compete more directly with AI assistants such as ChatGPT. The Gemini AI assistant can benefit from access to Google's general search services (eg via the Search API) and integration with Google Android in ways that are not available to others, meaning that there are material barriers to competition faced by other suppliers that do not apply to Google.
- 5.265 For these reasons we find that, although some AI assistants are an emerging competitive threat to Google's general search services and one which Google is responding to, at this stage it is unclear that AI assistants will develop to become a sustained and significant competitor to Google's general search services. Furthermore, it is also possible that these developments will in fact strengthen Google's position given its strategy to embed generative AI into its existing

⁸⁴¹ This includes queries to ChatGPT across all use cases and not just search-grounded queries.

products with a large user base as well as the development and launch of the Gemini AI assistant. These conclusions are consistent with the findings of the US DoJ Search Litigation that whilst generative AI products ‘may yet prove to be game changers’, they are ‘not yet close to replacing traditional [general search engines]’, where Google remains the dominant firm.⁸⁴²

- 5.266 The evidence does not indicate that other developments are likely to eliminate Google’s substantial market power in general search services in at least the next five years. [✂].
- 5.267 Therefore, we find that Google’s substantial market power in general search services is **entrenched**.
- 5.268 For these reasons and on the basis of all the evidence set out above, we have found that Google has substantial and entrenched market power in respect of general search services.

Position of strategic significance

- 5.269 As explained above, the SMS conditions are that the undertaking has:⁸⁴³
- (a) substantial and entrenched market power; and
 - (b) a position of strategic significance,
- in respect of the digital activity.
- 5.270 Both conditions must be met for the CMA to designate an undertaking as having SMS. In this section we assess whether Google has a position of strategic significance in general search services.
- 5.271 An undertaking has a position of strategic significance in respect of a digital activity where one or more of the following conditions is met:⁸⁴⁴
- (a) the undertaking has achieved a position of significant size or scale in respect of the digital activity;
 - (b) a significant number of other undertakings use the digital activity as carried out by the undertaking in carrying on their business;
 - (c) the undertaking’s position in respect of the digital activity would allow it to extend its market power to a range of other activities;

⁸⁴² *United States and State of Colorado v Google LLC*, Memorandum Opinion of 2 September 2025, paragraphs 63-66 and pages 1-2.

⁸⁴³ Section 2(2) of the Act.

⁸⁴⁴ Section 6 of the Act.

- (d) the undertaking's position in respect of the digital activity allows it to determine or substantially influence the ways in which other undertakings conduct themselves, in respect of the digital activity or otherwise.

5.272 Our guidance provides further details as to how we assess each condition.⁸⁴⁵

Our assessment

5.273 We have found that Google has a position of strategic significance in respect of general search services, because at least the first two conditions (significant size or scale and a significant number of other undertakings using the digital activity), either of which would suffice, are satisfied. This is on the basis of the evidence described below which shows that:

- (a) Google's general search services are used on a daily basis by a very large number of users (eg as a means of navigating the Internet) and businesses in the UK (eg as a means of reaching those users); and
- (b) Google's general search services are important to a wide range and large number of other businesses in the UK.

5.274 While we have received evidence indicating that the third and fourth factors may also be satisfied,⁸⁴⁶ given the above finding, and since only one factor is sufficient, we have not considered the third and fourth factors in detail.

Significant size or scale

5.275 Our guidance notes that there is no quantitative threshold for when size or scale can be considered 'significant'. This condition can be assessed using a range of absolute or relative metrics, which could include the number of users, purchases or transactions, and the revenue generated from the digital activity.⁸⁴⁷

5.276 A very large proportion of the UK population uses Google's general search products multiple times on a daily basis with Google acting as the gateway to the Internet for many people.⁸⁴⁸ For example:

- (a) In 2024, UK users inputted a total of [100-300] billion queries on Google's general search products, meaning an average of just over [5-10] daily

⁸⁴⁵ CMA194, paragraphs 2.68-2.75.

⁸⁴⁶ Ie that Google's position in respect of general search services (a) would allow it to extend its market power to a range of other activities and (b) allows it to determine or substantially influence the ways in which other undertakings conduct themselves, in respect of the digital activity or otherwise.

⁸⁴⁷ CMA194, paragraphs 2.68-2.70. See also explanatory notes to the Act, paragraph 114.

⁸⁴⁸ As set out in the US DoJ Search Litigation. See, *United States and State of Colorado v Google LLC*, Memorandum Opinion of 5 August 2024, page 140. [pr24-59-Google.pdf](#).

queries per UK citizen.^{849, 850} As set out paragraph 5.24 above, Google had a share of more than [90-100]% of all UK queries for traditional general search providers in 2024.⁸⁵¹

- (b) In the UK in December 2024, Google had more than [60-70] million logged-in users of its general search services on mobile and just under [20-30] million logged-in users on desktop.⁸⁵² This is significantly greater than Bing's logged-in users on both mobile (under [0-5] million) and desktop (around [10-20] million).⁸⁵³ Although a single individual may account for multiple logged-in users,⁸⁵⁴ to put these figures into context, in mid-2023 the UK population was around 68 million.⁸⁵⁵
- (c) Ofcom found that Google Search remains the highest-reaching search engine, reaching 83% of UK online adults in May 2024, with just under half (49%) visiting the search engine daily.⁸⁵⁶

5.277 A significant proportion of UK businesses use Google's search advertising, and a significant proportion of the UK population is exposed to Google's search advertising on a daily basis:

- (a) In 2024, just over [800-900] billion search advertisements were displayed by Google in the UK. Further, in 2024 approximately [40-50] billion responses to Google general search queries displayed at least one search advertisement, generating approximately [20-30] billion search advertising clicks for Google.⁸⁵⁷ This equates to an average of around [20-30] Google search advertising clicks per person per month in the UK in 2024.⁸⁵⁸ In comparison approximately [500-1000] million Bing search advertisements were clicked on

⁸⁴⁹ Google's consolidated response to the CMA's RFI.

⁸⁵⁰ Based on a UK population estimate of 68,265,200 for mid-2023. See: ONS, 'United Kingdom population mid-year estimate, 08 October 2024, accessed by the CMA on 03 April 2024. [United Kingdom population mid-year estimate - Office for National Statistics](#).

⁸⁵¹ See paragraph 5.24.

⁸⁵² Google's consolidated response to the CMA's RFI.

⁸⁵³ Microsoft's response to the CMA's RFI.

⁸⁵⁴ Logged-in users is an imperfect, but the best available, measure of the total number of individuals using Google Search in the UK. It is imperfect because (a) individuals can use Google Search without being logged-in (leading logged-in users to underestimate the total number of users) and (b) a single individual may account for multiple logged-in users (leading logged-in users to overestimate the total number of users).

⁸⁵⁵ ONS, 'United Kingdom population mid-year estimate, 08 October 2024, accessed by the CMA on 03 April 2025. [United Kingdom population mid-year estimate - Office for National Statistics](#).

⁸⁵⁶ Ofcom, 'Online Nation – 2024 Report', published on Ofcom.org.uk, dated 28 November 2024, accessed by the CMA on 24 April 2025. [Online Nation 2024 report](#).

⁸⁵⁷ In 2024, the number of clicks was [%] of the number of queries that displayed an ad. In comparison, [20-30] billion adverts were displayed on Bing in 2024, with [500-1000] million clicks in the same period. CMA analysis of Parties' data.

⁸⁵⁸ Based on a UK population estimate of 68,265,200 for mid-2023. See: ONS, 'United Kingdom population mid-year estimate, 08 October 2024, accessed by the CMA on 03 April 2024. [United Kingdom population mid-year estimate - Office for National Statistics](#).

in 2024.⁸⁵⁹ This equates to an average of just under [0-5] Bing search advertisement click per person per month in the UK in 2024.⁸⁶⁰

- (b) In 2024, around [200,000-300,000] unique entities advertised using Google's search advertising in the UK.⁸⁶¹ If each of these entities is a unique business then this is equivalent to [10-15]% of all UK businesses.⁸⁶²
- (c) Google has generated substantial revenues from its general search services. In 2024, Google generated £[10-20] billion of search advertising revenue from users in the UK, which is significantly greater than the search advertising revenue generated by Bing in 2024 (£[500-600] million).⁸⁶³ As shown in paragraph 5.116, Google accounts for more than [90-100]% of UK search advertising by providers of general search.⁸⁶⁴ The cost of Google's search advertising in the UK is equivalent to nearly £400 per household per year.⁸⁶⁵

5.278 The extent to which people and businesses use Google's general search products means that Google's actions can have significant impacts on virtually all people and businesses in the UK. Therefore, we have found that Google has a position of significant size and scale in respect of general search services.

A significant number of other firms use Google's general search services

5.279 Our guidance explains that this condition can be assessed, for example, by reference to the number of businesses, products and services 'hosted' on the firm's platform, and/or the proportion of other firms' sales it facilitates.⁸⁶⁶

5.280 Google's general search services are an important means by which other firms, across a wide variety of sectors, access customers, facilitate transactions, and therefore carry out their business. For instance:

- (a) As set out in paragraph 5.277(b) above, a significant proportion of UK businesses use Google's search advertising. In 2024, around [200,000-300,000] unique entities use Google's search advertising in the UK.⁸⁶⁷

⁸⁵⁹ Microsoft's response to the CMA's RFI.

⁸⁶⁰ Based on a UK population estimate of 68,265,200 for mid-2023. See: ONS, 'United Kingdom population mid-year estimate, 08 October 2024, accessed by the CMA on 03 April 2024. [United Kingdom population mid-year estimate - Office for National Statistics](#).

⁸⁶¹ Google's consolidated response to the CMA's RFI.

⁸⁶² Based on the number of businesses in the UK registered for VAT and/or PAYE, as of March 2024 (2.72 million). See: ONS, 'UK business; activity, size and location: 2024', 25 September 2024, accessed by the CMA on 10 April 2025. [UK business; activity, size and location - Office for National Statistics](#).

⁸⁶³ Google's consolidated response to the CMA's RFI. Microsoft's response to the CMA's RFI.

⁸⁶⁴ Google's consolidated response to the CMA's RFI; Bing's response to the CMA's RFI.

⁸⁶⁵ CMA analysis of Google's internal data and ONS 'Families and households'.

⁸⁶⁶ CMA194, paragraphs 2.71-2.72. See also explanatory notes to the Act, paragraph 115.

⁸⁶⁷ Google's consolidated response to the CMA's RFI.

- (b) Google submitted that Google Search is a ‘vital resource for UK businesses of all sizes’ and that ‘Google Search and Google Ads have helped UK business export over £20 billion worth of goods and services across the world annually’.⁸⁶⁸
- (c) Google has developed a wide range of features for its general search services that facilitate users’ interactions and business transactions. These features cover a wide variety of different industries, showing that Google is an important route to customers for businesses across the economy. For example, Google has developed the following features (several of which it also offers as products in their own right) that it has incorporated into its general search services (eg via the SERP):
 - (i) Google Maps, a mapping service, which is important for a range of local businesses such as restaurants.⁸⁶⁹
 - (ii) Similarly, Google has developed a feature that lists local businesses related to a specific query or location, displaying essential information such as business names, addresses, phone numbers and reviews.⁸⁷⁰
 - (iii) Google Flights and Google Hotel Finder, respectively flight comparison and hotel comparison tools.⁸⁷¹
 - (iv) Google Shopping for retailers.⁸⁷²
- (d) In 2024, the top 10 sectors receiving traffic from Google’s general search services in the UK covered a wide variety of different areas including [X]. These sectors were responsible for just over [X] of all Google’s UK queries in 2024.⁸⁷³
- (e) Google is also an important source of traffic for specialised search providers, although this varies significantly depending on the sectors in which these providers are active. On average, specialised search providers rely on Google for a significant part of their traffic ([30-40]% in 2024).⁸⁷⁴
- (f) Finally, we have also received evidence that changes to Google’s general search services (eg changes to the display of the SERP) can have significant

⁸⁶⁸ Google’s response to the ITC.

⁸⁶⁹ Google, ‘A look back at 15 years of mapping the world’ 06 February 2020, accessed by the CMA on 08 April 2025. [Google Maps’ biggest moments over the past 15 years](#).

⁸⁷⁰ TDMP, ‘A guide to Google’s 2024 SERP features & how to appear for them’, 02 October 2024, accessed by the CMA on 09 April 2025. [A Guide to Google’s 2024 SERP features - and how to appear for them | TDMP](#).

⁸⁷¹ [Online platforms and digital advertising market study](#), July 2020 (DAMS), paragraph 3.129.

⁸⁷² CED Commerce, ‘The A – Z of Google Shopping History’, 27 September 2021, accessed by the CMA on 08 April 2025. [Google Shopping History: Story of Google for Shopping](#).

⁸⁷³ Google’s consolidated response to the CMA’s RFI. The full list is (percentage of Google Search’s total UK traffic in brackets): [X].

⁸⁷⁴ See responses to the CMA’s RFI.

impacts on a range of businesses. For example, we received several [redacted] responses to our ITC from specialised search services and associated trade associations⁸⁷⁵ who expressed concern about Google's ability to provide more favourable treatment to its own specialist search services through the design of its SERP and the manipulation of the ranking of results appearing on the SERP. Similarly, a majority of [redacted] specialised search providers⁸⁷⁶ we spoke to indicated that changes to the presentation of Google's SERP have had an impact on either user behaviour or click-through rates in relation to their products in the last five years. The *Google Shopping* case also provided evidence of how changes to Google's SERP can have significant effects on the traffic received by third parties.⁸⁷⁷

- 5.281 The importance of Google's general search services as a means by which businesses from a wide range of sectors reach consumers and the impact that changes made by Google can have on these businesses can reduce certainty for businesses and affect their incentives to invest.
- 5.282 Therefore, we have found that a significant number of other undertakings use Google's general search services in carrying on their business.

⁸⁷⁵ See 4 responses to invitation comment dated 14 January 2025: Skyscanner, Checkatrade, [redacted], and AITO. [SMS investigation into Google's general search and search advertising services - GOV.UK](#).

⁸⁷⁶ See [redacted] responses to the CMA's RFI.

⁸⁷⁷ *Google and Alphabet v Commission (Google Shopping)*, C-48/22 P, ECLI:EU:C:2024:72, section 7.2.3. [39740_14996_3.pdf](#).