

Dear Sir/Madam,

Thank you for the opportunity to provide further input. In this submission we highlight key points we wish to emphasise and reiterate from our previous responses. We have also engaged with industry bodies including the NMA, NLA and the AOP to ensure our perspectives inform collective feedback to this process. Notwithstanding this coordinated approach, we are pleased to set out the specific issues affecting Independent Media brands.

Fair Ranking CR

In response to your questions:

Whether you agree with the scope of the Fair Ranking CR

We request greater clarity that the scope extends beyond traditional search engine results pages (the “10 blue links”) to include all references within first-party results provided by Google. This should explicitly include AI Overviews, AI Mode, Product Carousels, People Also Ask, Discussions & Forums, Image and Video results, FAQs, “What People Are Saying,” and Top Stories.

Without coverage of 100% of the search results environment, the CR would effectively apply to less than 5% of available SERP real estate, significantly limiting its effectiveness.

What the concept of a “material change” should cover

We consider material change to include both ranking policy changes and changes to ranking systems, including core updates and other algorithmic interventions that materially affect visibility or traffic.

By way of a live example occurring at the time of writing, a core update announced on 5 February 2026 was described as taking up to two weeks to complete, yet has continued beyond this period without further communication regarding completion. In other instances, such as the “Reviews Update” which took place in May 2025, saw the rollout of a significant update which affected visibility for publisher affiliate commerce websites, without announcement or acknowledgement.

To support transparency and enable appropriate preparation, we recommend that the following information be provided at least 30 days prior to implementation of a core update:

- A clear description of the purpose and focus of the update, and how it will change the experience
- for users
- The types of content, signals or behaviours being targeted

- The anticipated impact on ranking dynamics and content surfacing
- Any recommended actions publishers should consider

Advance notice is critical to allow publishers to assess risk, mitigate potential disruption to revenue, and ensure continuity of service for users.

Factors that should inform whether the materiality threshold has been reached

Materiality should be assessed based on demonstrable business impact rather than a fixed numerical threshold. Relevant indicators should include:

- Revenue impact
- Referral traffic changes
- Click-through rate (CTR) shifts
- Impression levels
- Brand visibility and attribution within AI-generated results

A flexible, impact-based approach is necessary given differences in scale and business models across publishers.

Publisher CR

In response to your questions:

Examples of information and metrics that help explain how content is attributed, the factuality of content surfaced in search generative AI features, and views on how that data is best disseminated

We reiterate that publishers require access to:

- Revenue attribution
- Referral traffic
- CTR
- Impressions
- Engagement metrics
- Brand visibility and attribution within AI-generated responses

This information should be provided with a maximum delay of two days to align with existing Google Search Console reporting timeframes as a minimum. Timely access is essential for:

- Monitoring accuracy of attribution

- Assessing commercial impact
- Identifying potential misrepresentation or factual issues
- Enabling publishers to respond quickly to changes affecting user reach and revenue

We appreciate the opportunity to contribute to this process and remain available to provide further clarification if helpful.

Yours faithfully,



Chief Data Officer

Independent.media

The Independent ● Independent Studio ● Bulletin ● IndyBest
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