



GOOGLE'S GENERAL SEARCH SERVICES: YELP'S RESPONSE TO PROPOSED CONDUCT REQUIREMENTS

1. Yelp operates a local search service that aims to help users find the best places to eat, shop, drink, relax and play. Yelp welcomes the opportunity to comment on the CMA's proposed conduct requirements (CRs).

Specialised search CR

2. The consideration of a specialised search CR has been pushed back in the Roadmap to Category 2.¹ This means, according to that document, specialised search CRs won't be considered until the "first half of 2026 onwards".² This is despite the fact that the CMA has long recognised that Google's ability to restrict access to specific search features may have a materially adverse impact on competition.³ Yelp urges the CMA to **accelerate its consideration of targeted measures in this area, to prevent the further entrenchment of Google's position in key verticals**. This work is especially urgent as Google continues to evolve its search engine results page (SERP), for instance through integration with its LLMs, in ways that exacerbate self-preferencing. Yelp would also welcome more clarity on when specialised search CRs are planned to be consulted on.
3. As Yelp has already explained in prior submissions, the Google Maps OneBox (**OneBox**) self-preferences Google's local search results with undue prominence on the search results page. By placing its map, listings and filters in the prime 'above the fold' space, Google directs users toward its own results, while third-party local search providers are excluded from the OneBox and pushed down 'below the fold'. As a result, standard organic links for other local search providers such as Yelp, SquareMeal or TripAdvisor, which may have more relevant information for the user than a Google result, even according to Google's own organic rankings, receive significantly less visibility. To enable fair competition, the OneBox should be opened up to alternative local search providers and populated on the basis of equitable criteria.
4. Google's self-preferencing has had, and continues to have, a severe impact on Yelp's business and investment in the UK. In late 2016, Yelp ceased to monetize its operations in

¹ CMA, *Strategic market status investigation into Google's general search services: Roadmap of possible measures to improve competition in search* (24 June 2025), link [here](#).

² CMA, *Strategic market status investigation into Google's general search services: Roadmap of possible measures to improve competition in search* (24 June 2025), para 3.14, link [here](#).

³ CMA, *Strategic market status investigation into Google's general search services: Roadmap of possible measures to improve competition in search* (24 June 2025), para 1.34, link [here](#).



the UK. As such, while Yelp maintains its UK-directed website and mobile applications - and a physical office in London as well as 267 staff based in the UK, including its Chief Technology Officer - it years ago stopped investing in growth in the UK, including in marketing, community management and sales teams. This decision was directly affected by loss of user traffic caused by Google's self-preferencing. **If robust specialised search interventions are prioritised by the CMA, Yelp would seriously consider re-investing in the UK.**

Fair ranking CR

5. While Yelp's priority is that a specialised search CR is prioritised and developed soon, Yelp does welcome the introduction of the Fair Ranking CRs.⁴ In particular, Yelp supports:
 - a. that the requirements cover the ranking of competing content within AI Overviews and AI Mode.⁵ This is important for local search providers, such as Yelp, as these AI-driven features may soon become the primary way users access information, overtaking traditional organic search results. Therefore, the ranking within these AI features must be fair and non-discriminatory; and
 - b. that they cover the ranking of Google's OneBox, which, to the extent it contains exclusively Google's results, should not be preferenced above other search results.⁶ Yelp would expect this obligation to be subject to robust testing and monitoring. If implemented effectively, the Google OneBox should appear below Yelp's and other third-party local search providers' results in many instances. The CMA must monitor this, and treat evidence that Google always wins as evidence that the objective of the remedy is being undermined (or is ineffective by design) and must be strengthened. For completeness, and much more importantly, Yelp considers that the preferable remedy would be to require Google to open participation in the OneBox to third parties on the basis of fair, objective and non-discriminatory criteria that ensure a level playing field. If the OneBox were opened up in this way, Yelp would have no objection to its prominent placement. Yelp has shared with the CMA its "Focus on the User" proposal, which abides by such a paradigm. This approach would be more effective because prominence is not determined solely by ranking order. Even where

⁴ CMA, *Consultation: Fair Ranking Conduct Requirement* (28 January 2026), link [here](#).

⁵ CMA, *Consultation: Fair Ranking Conduct Requirement* (28 January 2026), Scope 1(b), link [here](#).

⁶ CMA, *Consultation: Fair Ranking Conduct Requirement* (28 January 2026), Scope 1(c) and Non-discriminatory and objective 5, link [here](#).



the OneBox appears below traditional links to Yelp, it remains a more attractive and engaging feature due to its size (particularly on mobile, where there is a smaller screen) and enhanced functionalities, such as filtering options. Self-preferencing can also manifest in much simpler ways that do not rely on ranking-order — the relative size or color of text within or between traditional SERP features can steer user behavior towards particular outcomes.

6. Yelp also considers that the following CRs would benefit from further refinement:
- a. **notice in respect of material changes to ranking (CR5b):**⁷ this CR provides that Google should provide sufficient notice and information in respect of material changes to key ranking criteria. Yelp considers this should specify minimum notice periods in order to be effective. At the least, Google should be required to provide a defined notice period for major changes, whether set out in the conduct requirement itself or in the interpretive notes to guide Google’s expected approach. Such timeframes could operate as targets, but should be accompanied by an obligation on Google to report on compliance against them.
 - b. **complaints process (CR6):**⁸ similarly, the requirement for Google to have a clear and accessible complaints process requires greater specificity to ensure complaints are handled effectively. There should be a defined target response time, accompanied by an obligation on Google to report against it. Decisions on complaints should be supported by detailed reasoning and evidence, enabling the complainant to understand and, where appropriate, challenge the outcome. Finally, there should be a right of appeal to an independent party for all complainants who have suffered serious financial harm, not just those who have been manually removed from Google’s index.
 - c. **scope (CR3):**⁹ Yelp is concerned that the exclusion from scope of sponsored results may incentivise Google to increase the number of sponsored results appearing in Search results, AI Overviews or AI Mode. The CMA should continue to review the need for CRs addressing issues in relation to Google’s sponsored results - in

⁷ CMA, *Consultation: Fair Ranking Conduct Requirement* (28 January 2026), Transparency 5(b), link [here](#).

⁸ CMA, *Consultation: Fair Ranking Conduct Requirement* (28 January 2026), Non-distortion and complaints 6, link [here](#).

⁹ CMA, *Consultation: Fair Ranking Conduct Requirement* (28 January 2026), Scope 2, link [here](#).



particular in relation to ad load and transparency as to which results are sponsored results.

Publisher CR

7. As the CMA is aware, local search and review service providers, including Yelp, primarily monetise through online advertising and sponsored listings on their own websites. These revenue streams are directly dependent on user traffic and engagement. Referrals from general search AI services are therefore a critical input into publishers' ability to compete and to sustain investment in high-quality content and reviews.
8. The CMA refers to publishers exercising control over the use of their content in AI Overviews and AI Mode. While such control may, in principle, create some competitive constraint on Google - by incentivising it to maintain an attractive offering so that publishers do not opt out - the practical reality is more complex.
9. For publishers such as Yelp, opting out would likely entail significant commercial risk. Google will continue to include its own local search content, and if other Yelp competitors choose to opt in, they may gain incremental visibility and traffic at Yelp's expense. As AI Overviews and AI Mode become increasingly central to user journeys and online discovery, participation may cease to be a genuine choice. In practice, Yelp may be compelled to opt in simply to preserve its visibility, regardless of the terms on which its content is used.

Open vs closed experiences

10. The increasing integration of generative LLM features into Google Search – including AI Overviews and AI Mode – materially alters how publisher content is presented to users. Rather than directing users to underlying websites, these features frequently provide synthesised, qualitative responses directly on the search results page, increasingly resulting in zero clicks for the publisher. This fundamentally changes the role of publishers in the search ecosystem and makes it more difficult to maintain business models that allow for the publication of new high-quality content.
11. For these purposes, it is helpful to distinguish between “open” and “closed” user experiences. Google should be compelled to offer open experiences to its users.
12. An “open” experience is effective in clearly presenting, in the visual context, where relevant content is from, and prominently provides - and does not minimise - a path for the user to click into relevant non-Google entities.



13. In contrast, a “closed” experience takes measures to minimise the likelihood that users will exit Google’s ecosystem and engage with third-party content, for instance by summarising relevant information from another website (whether correctly or not) or obscuring the visual cues that might lead users to a website with relevant information. Obscurative tactics include, non-exhaustively: the exclusion or minimisation of links or the presentation of pseudo-links that draw users to the results of secondary Google searches (a common occurrence in Google’s LLM features). Such closed experiences fail to offer users the transparency and optionality they deserve as they seek to uncover information.
14. At present, AI Overviews and AI Mode predominantly deliver closed experiences, although the precise format and prominence of attribution and links is difficult for publishers to predict and may vary by query. This lack of predictability further compounds the commercial uncertainty faced by publishers.
15. In order to allow for the production of high-quality content and to preserve fair competition and sustainable incentives, publishers should be provided with meaningful and granular controls over the use of their content in generative AI features. Publishers such as Yelp should be able to opt out of having their content used in closed experiences, while remaining eligible to appear in open experiences that drive traffic to their websites and without being penalised in ranking within those results. Such controls should not require publishers to withdraw from indexing or ranking in general search results.
16. A monitoring system should be established that compels Google to provide information about what percentage of users who enter Google’s LLM features (such as AI Overviews and AI Mode) go on to click out to a non-Google website. Google should offer data at a granular/sub-query level - such as in categories like local, flights, things to do and so on.

Opt-out for training for AI Overviews and AI Mode

17. The current CR permits opt out of grounding of AI Overviews and AI Mode, but not training. From a competition perspective, it is essential that publishers retain meaningful control over whether their content is used to ground or *train* Google’s AI Overviews and related models.
18. There is a critical distinction between “grounding” (or retrieval-augmented generation) and “training”. Grounding is transactional: Google relies on live publisher content to answer a specific query and, in doing so, remains dependent on the source for verification and freshness. Training, by contrast, is permanent. Once Google trains its models on publishers’ proprietary data, it internalises the patterns, insights and structured information derived from that content. At that point, Google is no longer reliant on the original source to satisfy user



intent. The publisher's content has effectively been converted into a substitute product embedded within Google's own interface.

19. This dynamic materially exacerbates the "zero-click" phenomenon, whereby users receive complete answers directly on the search results page without visiting third-party sites. If Google is permitted to train on publishers' content without explicit consent and appropriate safeguards, it is able to use that content to generate comprehensive answers that displace the need to click through to the original source. The result is a feedback loop: publisher content improves Google's AI responses; improved AI responses reduce clicks; reduced traffic undermines publishers' ability to monetise and invest in content creation.
20. In these circumstances, the ability to opt out of training is not a marginal preference but a necessary competitive safeguard. Without effective control over training, publishers risk enabling Google to replicate and ultimately replace their offerings within its own ecosystem. The CMA should therefore treat meaningful publisher consent and control over AI training as a core component of any pro-competitive framework.

Payment for content

21. We understand that the CMA is still considering a "payment for content" CR requiring fair reimbursement of publishers for their content. Yelp supports this and urges the CMA to accelerate its consideration of this issue.
22. In this respect, Yelp would like to make a proposal in relation to Google's paid-for adverts: where Google places advertising alongside summaries in AI Overviews and AI Mode, it should be required to share the associated advertising revenue with the publishers whose content underpins those summaries, consistent with the revenue-sharing approach it applies on YouTube. For example, Google shares 45%-55% of its advertising revenue with YouTube creators whose content generated such advertising revenue.