

Competition and Markets Authority

By email:

6 March 2026

Consultation on Google's general search services: proposed conduct requirements

Trainline welcomes the opportunity to share a response on the proposed conduct requirements from the Competition and Markets Authority (the “CMA”) as applied to Google’s general search services under the Digital Markets, Competition and Consumers Act (the “Act”).

Trainline is a British listed tech innovator, offering customers around the world a leading independent travel platform to purchase rail & coach tickets from over 270 operators across 40 countries. Through our highly rated website and mobile app, people can seamlessly search, book and manage their journeys all in one place. We help customers find the best value fares for their journey, alongside smart, real time travel information. Independent online retailers like Trainline play a crucial role in driving the transition to sustainable mobility, expanding consumer choice and driving economic growth, due to substantial investment in digitalisation, innovation and online marketing.

Like many digital businesses seeking opportunities to grow in the UK and beyond, Trainline is encouraged by the potential of the Act to create a more level playing field and introduce accountability for anti-competitive behaviour by dominant platforms which otherwise has the potential to stifle British tech innovation; such behaviour risks distorting the digital distribution market for rail ticket retail and constraining innovation for consumers.

This is particularly true at the moment when the passenger rail ticket retail landscape in the UK is undergoing significant structural reform. The Railways Bill, introduced to Parliament on 5 November 2025 and currently progressing through the legislative process, provides the statutory framework for the creation of Great British Railways (GBR). GBR will enter the retail market directly, selling tickets through its own website and app (among other channels). This means GBR will define core elements of the market and operate the trains while *also* acting, through GBR online retail, as new vertically-integrated, state-owned retailer competing with independent retailers. This dual role envisaged for GBR creates a conflict of interest and raises the risk of self-preferencing. The CMA has itself acknowledged these risks:

“the role envisaged for GBR as a ticket retailer gives rise to the risk (either actual or perceived) that GBR will self-preference its own retail operation, or otherwise have advantages over TPRs that are not based on merit ... This could undermine incentives for TPRs to invest and compete in this market... It is [...] important to give the right signals from the outset that TPRs will be competing on a level playing field with GBR - to encourage the competition and investment which will benefit passengers directly.” -- CMA consultation response to DfT, A Railway Fit for Britain’s Future, April 2025

In both contexts, digital search distribution and rail retail reform, the combination of structural market power and vertical integration creates risks of self-preferencing unless accompanied by adequate safeguards. The proposed conduct requirements relating to **Fair Ranking, Publisher Controls and User Choice** are interdependent. Together, they aim to address entrenched distribution advantages and restore contestability

in digital markets. Their effectiveness will depend on robust design, practical enforceability and meaningful transparency.

We address the questions of the consultation as set out below as relates to Fair Ranking, Publisher and User Choice.

Fair Ranking

General

6.2 Do you agree with the proposed scope of the Fair Ranking CR?

Trainline welcomes the CMA's objective of ensuring that Google's ranking practices are fair, objective and non-discriminatory. However, as currently framed, the proposed scope of the Fair Ranking CR risks reflecting an increasingly narrow conception of what constitutes "organic" ranking in the contemporary SERP environment.

Historically, the SERP consisted predominantly of a linear list of uniform organic results — typically titles and short descriptive snippets linking to third-party webpages. Ranking, in that context, was the process by which webpages and digital content were ordered on that page through the application of algorithmic criteria. Competitive visibility was therefore largely determined by a publisher's position within a sequential list. In such an environment, fairness could reasonably be assessed by reference to relative position: whether one webpage appeared above or below another in a transparent and consistently applied ranking framework. That paradigm no longer reflects how search operates in practice.

Today, search results can take multiple forms. These include AI-generated responses, Google's own vertically integrated modules, interactive answer formats and expandable question panels, among other non-paid SERP tools. In many cases, only a limited number of traditional organic links remain visible "above the fold" and this is even more true in mobile devices where organic content can now require significant scrolling to view. The competitive reality is therefore not simply a question of which link appears above another, but how different forms of non-paid results are positioned, sized and presented relative to one another.

In this context, the concept of ranking must necessarily encompass the relative prominence and format of different non-paid SERP elements. Where one category of non-paid result is consistently afforded materially greater screen space or visual prominence than others, the competitive impact may be significant, even if the internal ranking signals within each category are formally neutral.

Certain result formats, which may currently be non-paid can function as a different form of organic result and should therefore be subject to the same fairness principles as any other non-paid listings. If the Fair Ranking CR applies only to a shrinking subset of traditional link-based results, it risks regulating an ever-diminishing proportion of the SERP.

This concern is amplified by the fluid boundary between paid and non-paid formats. Search interfaces evolve rapidly. Features that are initially introduced as unpaid modules may, over time, become monetised or subject to bidding dynamics. Shopping results provide a clear example of this evolution. The rail module is currently presented as a non-paid format, but there is no structural reason why such modules could not evolve into paid placements in future. Similarly, AI-generated responses may, over time, incorporate commercial prioritisation or auction-based participation. If paid formats are excluded from scope, and non-paid formats can subsequently migrate into monetised tools, the practical effect may be that a substantial portion of the SERP falls outside the reach of the CR.

The scope of the CR should ensure that all non-paid SERP elements, including modules, AI responses and other alternative organic formats, are treated consistently under objective and non-discriminatory principles. In

addition, the CMA may wish to consider whether mechanisms are required to prevent the scope of the CR from being circumvented through the reclassification or monetisation of previously organic features. Ranking fairness must reflect the SERP as it exists today, and as it is likely to evolve, rather than outdated formats.

Trainline recognises that the CMA has indicated that certain issues relating to paid search and specialised search services may be considered separately or at a later stage. However, Trainline respectfully submits that the exclusion of paid search from the scope of the Fair Ranking CR risks overlooking the immediate and practical interaction between organic ranking, module prominence and paid advertising dynamics. While paid search may involve distinct auction mechanics, in the modern SERP environment the boundaries between organic results, Google-owned modules and paid placements are increasingly blurred from both a user and competitive perspective. Decisions affecting placement, prominence and presentation can simultaneously influence organic visibility and paid market outcomes. Deferring consideration of these interactions may therefore leave a material component of the competitive impact unaddressed.

Accordingly, Trainline considers that the Fair Ranking CR should also permit assessment of the cumulative effects of organic displacement and paid advertising load where these arise from ranking and presentation decisions. Addressing these issues in a later phase risk fragmenting what is, in practice, a single competitive ecosystem.

Practical solutions could involve:

1. Google-owned services must not automatically receive default top-of-page placement.
2. Google-owned products and specialised search services must be subject to the same objective, non-discriminatory and transparent criteria as third-party services.
3. Decisions relating to placement, format, prominence, and screen space allocation must be determined by objective relevance-based considerations and not by ownership or downstream commercial interests. The Fair Ranking CR should extend to decisions that materially affect the overall competitive visibility of third-party services on the SERP, including the interaction between organic and paid results.
4. The non-distortion limb of the CR should explicitly permit consideration of advertising auction impacts and paid dependency effects when assessing material adverse impact.

Without such inclusion, the effectiveness of the Fair Ranking CR may be materially undermined.

6.3 Do you have any views or evidence on the benefits or costs of the Fair Ranking CR?

The evolution of the SERP over recent years has had a material impact on Trainline's ability to compete effectively. As Google has progressively expanded the prominence of its own interfaces, including vertical modules such as Google Trains, and Google features (e.g. AI Overview and Mode), alongside increased depth of paid placements displayed before organic results, the practical value of organic ranking has diminished significantly. Organic results that were previously visible "above the fold" are now frequently displaced by Google-owned modules and multiple layers of paid content. Even where Trainline ranks highly under Google's organic criteria, that ranking no longer guarantees meaningful visibility.

This structural shift has two direct consequences. First, the displacement of organic results materially reduces the value of organic search as a customer acquisition channel. Organic ranking is only effective where it translates into consumer visibility and engagement. Where Google-owned modules and paid placements dominate premium screen real estate, the commercial benefit of organic ranking is substantially impaired, regardless of whether ranking criteria are formally non-discriminatory.

Second, the reduction in effective organic visibility increases reliance on paid advertising in order to remain competitive. As organic routes to market are constrained, businesses are compelled to participate more

aggressively in paid auctions to maintain access to consumers. This dynamic intensifies competition within those auctions and contributes to upward pressure on advertising costs. In practical terms, when Google pushes organic results further down the SERP, it simultaneously increases the commercial necessity of paid participation.

These effects are not theoretical. [REDACTED]

[REDACTED] The interaction between organic displacement and paid inflation is therefore a structural feature of how competition operates in search today

From the user’s perspective, paid and organic results form part of a single integrated interface. From a competitive perspective, decisions relating to placement, prominence and screen space allocation directly affect both organic and paid dynamics. A conduct regime that regulates organic ranking in isolation, while leaving paid placement and module configuration outside scope, risks addressing only part of the competitive distortion.

For the Fair Ranking CR to achieve its stated objective of ensuring fair and non-discriminatory treatment, it must acknowledge the cumulative impact of:

- Organic displacement through module prominence;
- Increased depth and positioning of paid advertising; and
- The resulting inflationary pressure in advertising auctions.

[REDACTED]

[TABLE REDACTED]

[REDACTED] The following sections outline the observed impact on Paid and Organic performance.

Paid Marketing (PPC):

With 4 ad slots now occupying the top of the SERP, a greater proportion of above-the-fold real estate is allocated to paid placements. This reduces the visibility of lower paid positions and organic links.

The absolute top position has become disproportionately more valuable, leading advertisers to increase bids to secure this position. This heightened competitive intensity has driven cost-per-click (CPC) higher.

[REDACTED]

[TABLE REDACTED]

Organic Marketing (SEO):

With 4 ads (plus potential AI overviews and Google Trains module) at the top of the SERP, the #1 organic result is often pushed “below the fold”, i.e. off-screen without scrolling, especially on mobile devices. This makes it much more difficult for prospective customers to see and subsequently click on an Organic link.

The graph below illustrates 

[TABLE REDACTED]

However, during the same period, Google has made the following structural changes to the SERP:

- Google Trains – started to go above TL SEO from June 2023, reaching ~90% above by December 2023
- Introduced AI Overviews – August 2024
- Doubling of ad-depth from 2 ads to >4 – ramping up from September 2024
- Introduced AI Mode – August 2025


The combination of stable rankings and significant changes to SERP layout and features strongly indicates that external structural factors have been a primary driver of the observed CTR decline.

[TABLE REDACTED]

Non-discriminatory and objective

6.4 Do you have any views on the non-discrimination part of the Fair Ranking CR? In particular: (a) Are the requirements sufficiently comprehensive?

Trainline supports the CMA's objective of ensuring that Google's ranking and presentation of search results are based on objective and non-discriminatory criteria. This principle is fundamental to restoring confidence in search as a fair route to market. However, as currently framed, the proposed non-discrimination limb risks being narrower in practical effect than intended. Without further clarification, compliance could be interpreted as limited to the internal weighting of ranking signals, while leaving unaffected broader decisions relating to placement, prominence, presentation and configuration of search features. In the current SERP environment, these structural decisions are often more determinative of competitive outcomes than ranking order within a given category.

In practice, Google's own specialised services, including Google Trains, benefit not only from their inclusion in search results, but from their format, visual prominence and positioning on the page. These services are frequently displayed in interactive modules occupying premium screen space, often ahead of organic results. The competitive impact of such placement is significant. Even where ranking criteria are facially neutral, the effective visibility of competing third-party services may be materially reduced through presentation and layout decisions.

For the non-discrimination requirement to be effective, it must therefore extend beyond formal parity of ranking signals. Google-owned products and specialised search services should be subject to the same objective, transparent and non-discriminatory criteria in relation to placement, prominence and presentation as equivalent third-party services. Decisions affecting screen space allocation, default positioning, and integration into the SERP should not afford Google's own services a structural advantage unless such treatment can be objectively justified by reference to relevance and applied consistently.

In addition, Trainline considers that the non-discrimination obligation must apply consistently across all Google-operated access points and devices. The principles of objective and non-discriminatory treatment should not vary depending on whether a user accesses search via Android devices, Chrome on desktop, iOS/iPadOS, search widgets, or other Google-controlled interfaces.

Competitive harm may arise not only from preferential treatment within a single environment, but from inconsistent application of ranking and presentation principles across platforms. If neutrality standards are applied more rigorously in one interface but diluted in another, the cumulative effect may replicate the same distortion the CR seeks to address.

The obligation should therefore make clear that the objective and non-discriminatory criteria governing ranking, placement and prominence apply systemically across Google's general search ecosystem. Fair ranking cannot be interface-specific. It must operate consistently across devices and access points to ensure that competitive neutrality is meaningful in practice.

Trainline is also concerned that the concept of "objective criteria" risks being under-defined. In the absence of clear parameters or oversight mechanisms, Google may be able to articulate criteria that appear neutral in form while being designed or applied in a manner that preserves preferential outcomes. The requirement should therefore ensure that objective criteria are capable of independent scrutiny and meaningful verification. Without this, the CR risks becoming procedural rather than substantive.

(b) Are there other factors which should be included in paragraph 4?

In addition to the factors already listed in paragraph 4(a), Trainline considers that the non-discrimination obligation should make clear that Google must not take into account, directly or indirectly:

1. Whether the service is owned, operated or affiliated with Google;
2. The impact of placement or prominence on Google's advertising revenues or downstream commercial interests; and
3. Access to proprietary data or integration advantages unavailable to third-party providers, unless such advantages are made available on fair and reasonable terms.

Clarifying these additional considerations would reduce the risk that structural advantages embedded within Google's ecosystem undermine the intended neutrality of the CR.

To restore confidence in fair competition, the requirement must ensure that Google does not advantage its own services through either algorithmic weighting or structural configuration.

Additionally, Trainline considers that transparency obligations must extend beyond the publication of high-level or abstract principles. While general statements regarding relevance, quality or user benefit are important, they are not sufficient in isolation to enable publishers and business users to understand how ranking and visibility operate in practice.

To be effective, transparency must provide sufficiently clear and concrete information to allow affected businesses to:

- Understand the key categories of factors that materially influence ranking and visibility;
- Distinguish between changes to ranking signals and changes to presentation or prominence frameworks;
- Assess how those factors interact with different result formats on the SERP; and
- Identify whether a material change has occurred that may affect their competitive position.

Where appropriate, more detailed criteria, methodologies or internal processes may be provided confidentially to the CMA to protect commercially sensitive information while enabling meaningful oversight and verification of compliance. The CMA is well placed to receive, review and safeguard such information within the confines of its statutory duties, without requiring broader dissemination. However, affected publishers should receive sufficient clarity to understand how visibility is determined and how changes may affect them. Without this, the transparency limb of the CR risks being formal rather than functional.

Accordingly, concerns regarding confidentiality should not preclude the inclusion of robust transparency obligations within the CR. The objective is not to expose proprietary systems to competitors, but to ensure that the non-discrimination and objectivity requirements are capable of effective regulatory scrutiny. Providing such information to the CMA, subject to appropriate confidentiality protections, strikes an appropriate balance between accountability and the protection of legitimate commercial interests.

Transparency

6.5 Do you have views on the transparency part of the Fair Ranking CR? In particular: (a) What should the concept of a ‘material change’ cover? Eg ranking policy changes, and/or changes to ranking systems (e.g. core updates).

Trainline supports the inclusion of transparency obligations within the Fair Ranking CR. Increased transparency is essential to restoring confidence in the fairness and predictability of search as a route to market. Businesses that rely on general search services to reach consumers must be able to understand, in reasonable terms, the framework within which ranking and presentation decisions are made, and to anticipate material changes that may affect their visibility.

The concept of a “material change” should, in Trainline’s view, extend beyond core algorithm updates narrowly defined. It should encompass structural changes to ranking systems, ranking policies, presentation frameworks and SERP configuration that are reasonably likely to have a material impact on organic visibility or competitive positioning. This includes, for example, the introduction of new ranking signals that materially alter ordering outcomes, substantive policy changes affecting inclusion or treatment of services, and structural adjustments to the placement or prominence of modules and features that interact with organic results.

In addition, changes that materially affect the balance between organic and other forms of content on the SERP – including adjustments to module positioning or advertising load that alter effective visibility – should fall within the concept of a material change where they are likely to affect the competitive landscape.

Advance notice of such changes is a particularly significant and positive inclusion within the proposed CR. In practice, search businesses operate in highly dynamic environments and make investment decisions based on a reasonable expectation of stability in ranking frameworks. Where significant changes are implemented without notice, businesses are forced into reactive adjustments, often incurring avoidable cost and operational disruption. Providing advance notice of material changes enables affected businesses to prepare, test and adapt in a structured manner. It reduces unnecessary volatility, supports more efficient allocation of marketing and product development resources, and mitigates the risk of sudden and disproportionate traffic loss. Importantly, advance notice does not prevent Google from innovating or improving its systems; rather, it ensures that innovation does not result in avoidable and opaque market disruption. Trainline therefore strongly supports the inclusion of a requirement for advance notice of material changes and considers this an essential component of a fair and predictable search ecosystem.

(b) What are the advantages or risks of including your suggested changes?

Clarifying the scope of what constitutes a “material change” and strengthening the associated transparency obligations would deliver several important benefits.

First, greater clarity would reinforce consumer choice and benefit, which should remain the primary driver of innovation in search. Transparent and predictable frameworks incentivise sustainable innovation by ensuring that improvements in search quality or presentation are grounded in relevance and user value, rather than structural advantage. Where changes materially affect the visibility of competing services, appropriate notice and explanation support informed market participation and ultimately enhance consumer outcomes.

Second, clarifying “material change” is necessary to preserve organic visibility as a meaningful competitive channel. The principle of ranking fairness risks becoming hollow if structural changes to SERP layout or presentation can materially reduce organic prominence without notice, scrutiny or explanation. Organic ranking has value only insofar as it translates into effective visibility. Where layout or module adjustments crowd organic results, the competitive implications are significant. Including such changes within the transparency obligation ensures that ranking fairness is not undermined by presentation decisions.

Third, enhanced transparency improves commercial predictability. Businesses such as Trainline make substantial and ongoing investments in digital infrastructure, product development and performance marketing. Where Google introduces new modules, materially alters placement, or adjusts presentation frameworks, the impact on traffic flows can be immediate. Advance notice enables affected businesses to adapt marketing budgets, recalibrate traffic strategies and implement operational adjustments in an orderly and proportionate manner.

Relatedly, advance transparency reduces “shock effects”. Structural SERP changes frequently have immediate and material traffic consequences. Sudden drops in visibility or spikes in auction pressure can occur before businesses have an opportunity to respond. Advance notice mitigates unnecessary volatility and supports smoother market adjustment without impeding Google’s ability to innovate.

Trainline recognises that any expansion of transparency obligations must be proportionate and should not require disclosure of sensitive technical details that could facilitate risk of “innovation chill”. In Trainline’s view, this risk is unlikely. Requiring advance notice and high-level explanation of material structural changes does not inhibit innovation; rather, it promotes responsible innovation within a predictable and accountable framework.

Accordingly, Trainline considers that clarifying the definition of “material change” and maintaining robust advance notice obligations would strengthen the effectiveness of the Fair Ranking CR while striking an appropriate balance between innovation and accountability.

Non-Distortion and Complaints

6.6 Do you have views on the non-distortion and complaints part of the Fair Ranking CR? In particular:

(a) What are your views on our proposed complaints-led process for addressing concerns about distortions, including advantages and risks?

Trainline supports the introduction of a complaints-led mechanism to address distortions arising from Google’s ranking and presentation decisions. Given Google’s dual role as both platform operator and competitor in downstream travel markets, including rail retail, it is essential that affected businesses have access to a structured and enforceable route through which to raise concerns where search presentation materially affects competitive conditions.

A mechanism of this nature is an important safeguard within the broader framework of the Fair Ranking CR. However, its effectiveness will depend critically on how the concept of “distortion” is interpreted and how the process operates in practice.

If distortion were interpreted narrowly — for example, confined to explicit algorithmic discrimination within ranking criteria — the mechanism would risk overlooking the structural features of the modern SERP that can produce equivalent competitive harm. In practice, competitive disadvantage may arise not from overt signal manipulation, but from decisions relating to prominence, placement, presentation and configuration. Structural self-preferencing can occur through module design, screen space allocation and the cumulative interaction between organic results, Google-owned vertical services and paid placements.

For the mechanism to be effective, the concept of distortion should therefore encompass substantive competitive effects, including circumstances where conduct materially increases rivals' customer acquisition costs, reduces effective organic visibility, or systematically affords preferential prominence to Google-owned services. Absent such scope, there is a risk that the complaints process addresses formal equality within ranking categories while leaving structural distortions intact.

In addition, Trainline's experience navigating Google's existing complaints mechanism for trademark infringement illustrates the importance of clarity, predictability and procedural coherence in complaint handling. In our experience, the process for addressing advertisements that misused or referenced the Trainline brand lacked consistent guidance, accessible reporting flows and clear policy anchoring.

For example, [REDACTED] were instead treated as violations under separate policy categories, including "destination requirements", "destination mismatch" or "misrepresentation/abusing the ad network", rather than being clearly addressed under the Trademark Policy framework. This shifting categorisation created uncertainty as to which policy applied and which complaint route should be followed.

Similarly, in cases involving [REDACTED] we were required to seek repeated clarification as to where Google's policies addressed such conduct. Clear policy references were not provided at an early stage. Depending on how the issue was internally classified, we were directed to different enforcement channels, including the Trademark complaint form, general policy complaint mechanisms, or escalation through account management teams. This fragmentation reduced predictability and slowed enforcement.

Although we ultimately obtained confirmation [REDACTED] the absence of a clear and unified pathway created avoidable delay and commercial uncertainty.

This experience demonstrates that the effectiveness of a complaints-led distortion mechanism depends not only on its existence, but on the clarity and procedural robustness of its operation. The CR should therefore include:

- Clear definition of the types of conduct that fall within scope;
- A single, identifiable complaints pathway for raising concerns under the CR;
- Defined stages of review and escalation; and
- Indicative timelines or SLAs for investigation and resolution.

Given the speed at which SERP changes and advertising practices can affect traffic flows and commercial performance, delays in review may materially undermine the effectiveness of any eventual remedy. A structured and time-bound process would enhance certainty, strengthen accountability and ensure that the distortion mechanism functions as a meaningful ex ante safeguard rather than a purely reactive instrument.

Taken together, a properly scoped and procedurally robust complaints framework would represent a valuable complement to the non-discrimination and transparency obligations within the Fair Ranking CR.

In addition to a complaints-led mechanism, Trainline considers that effective implementation of the Fair Ranking CR would benefit from ongoing risk monitoring and periodic independent audit obligations. Given the dynamic and technically complex nature of search ranking systems, distortions may emerge gradually through

cumulative design decisions rather than discrete policy changes. A purely reactive, complaint-driven framework may therefore be insufficient to identify emerging risks in a timely manner.

Trainline recommends that Google be subject to a continuing obligation to:

- Assess and document risks of competitive distortion arising from ranking, placement and presentation decisions;
- Monitor the cumulative effects of material changes to SERP configuration, module prominence and advertising load; and
- Provide periodic reports to the CMA summarising identified risks, mitigation measures and compliance processes.

Such reporting could be provided confidentially to the CMA and need not involve public disclosure of commercially sensitive information. The objective is not to expose proprietary systems, but to ensure that the non-discrimination, transparency and non-distortion limbs of the CR are capable of effective and ongoing supervision.

A structured risk auditing obligation would complement the complaints mechanism by introducing a proactive layer of oversight. It would assist the CMA in monitoring systemic distortion risks before they crystallise into material harm, thereby enhancing both the effectiveness and proportionality of the regime.

(b) What factors should inform whether the materiality threshold has been reached?

Materiality should be assessed using economic and competitive impact indicators rather than complaint volume alone. As such, the following factors should inform the threshold:

1. Measurable, sustained increase in CPC post Google module / feature roll out or ranking criteria change.
2. Evidence of intensified auction competition following module, layout or ranking criteria changes.
3. Increased paid dependency resulting from organic displacement.

Considering that changes to Google modules, placement above organic and increased ad load can significantly alter competitive dynamics even where ranking criteria are formally objective, the distortion mechanism should assess cumulative SERP effects rather than isolated ranking changes. Without this, fair ranking in principle may not translate into fair competitive outcomes in practice.

6.7 Do you have views on our proposals for introducing a general complaints process covering manual exclusions from Google's search index?

Trainline supports the introduction of a general complaints process covering manual exclusions from Google's search index, subject to inclusion of the appropriate safeguards. Removal or demotion from the index can have immediate and material commercial consequences for affected businesses. In markets such as rail retail, where general search services remain a critical route to customer acquisition, exclusion from indexing can result in a sudden and disproportionate loss of visibility, traffic and revenue.

A structured and transparent mechanism for challenging manual exclusions is therefore an important safeguard. It provides businesses with procedural fairness and reinforces confidence that index decisions are applied consistently and objectively.

However, for such a mechanism to be effective in practice, it must be underpinned by clear procedural standards. At a minimum, the process should include:

- Timely notification of the reasons for exclusion or demotion;
- A clear and accessible route for appeal;
- Defined stages of review; and
- Indicative timelines for investigation and resolution.

Without these elements, there is a risk that the complaints process becomes protracted or opaque, undermining its practical utility. Given the speed at which exclusion decisions can impact traffic flows, delays in review may significantly reduce the effectiveness of any subsequent remedy.

Trainline recognises the importance of allowing Google to act swiftly to address spam, fraud, security risks and unlawful content. The complaints process should not weaken legitimate enforcement measures designed to protect users and maintain search integrity. However, procedural safeguards and accountability mechanisms can coexist with effective content governance.

In addition, where exclusions are based on the application of broader ranking or policy criteria, there should be sufficient transparency to enable affected parties to understand whether the decision reflects an isolated compliance issue or a broader policy shift with systemic implications.

Publisher

6.1 We welcome views on any aspect of the Publisher CR design or analysis set out above. We are particularly interested in stakeholder feedback on the following questions.

Trainline strongly supports the introduction of the proposed Publisher Conduct Requirement (“**Publisher CR**”). We recognise the importance of ensuring that Google’s use of publisher content within generative AI services and features is fair, transparent and subject to meaningful control. However, for the Publisher CR to achieve its stated objectives, it must deliver practical and commercially effective protections rather than formal safeguards alone.

At its core, the Publisher CR must restore meaningful commercial agency to publishers in an increasingly AI-driven search environment. This requires (i) meaningful control over how publisher content is used, (ii) transparency sufficient to inform commercial decision-making, and (iii) attribution standards that protect brand value, traffic flows and consumer trust.

Meaningful Control

Existing controls, particularly Google-Extended, lack sufficient clarity and functional granularity. In particular, the distinction between the use of publisher content for model training and its use for grounding or display in generative AI responses is commercially significant.

Training use may affect long-term competitive dynamics, including the development of AI-driven travel interfaces and downstream substitution risk. By contrast, grounding and display use within search generative AI features has immediate and measurable consequences for click-through rates, organic visibility and reliance on paid channels.

Without separate and explicit opt-out mechanisms for training and grounding, publishers are required to accept materially different risk profiles through a single aggregated control. This does not constitute meaningful commercial choice. The Publisher CR should therefore require clearly separated and explicit opt-outs for:

- The training of generative AI models; and
- The grounding and display use of publisher content within generative AI services.

Similarly, Trainline supports the introduction of page-level controls where technically feasible. Different categories of content carry different strategic, commercial and reputational significance. High-conversion, premium or sensitive content may warrant differentiated treatment. While Trainline recognises proportionality considerations, we support a phased implementation approach:

- Prioritising page-level controls within search generative AI grounding; and
- Extending equivalent granularity outside general search where technically workable.

Transparency Enabling Commercial Decision-Making

Transparency obligations should enable publishers to make informed and commercially rational decisions regarding participation in generative AI features.

Trainline supports the provision of disaggregated performance and engagement data. AI Overviews, AI Mode and future generative formats operate differently and may have materially different traffic diversion

effects. For Trainline, the introduction of travel-specific modules such as Google Trains has produced measurable changes in click-through rates and visibility. The same logic applies to generative formats.

Accordingly, Google should provide separate reporting for:

- AI Overviews;
- AI Mode;
- Any future search generative AI feature;

including metrics such as:

- Impressions;
- Clicks;
- Click-through rate (CTR);
- Visibility metrics relative to organic listings; and
- Click-quality indicators.

Absent such reporting, publishers cannot assess whether inclusion in generative features is commercially beneficial.

In addition, Trainline strongly supports the provision of structured “click quality” information. Public assertions that generative features deliver “higher quality traffic” cannot be evaluated without access to relevant commercial metrics. Click-quality data should include, where available:

- Visits;
- Conversion rate (CVR);
- Transactions;
- Revenue;
- Assisted conversion effects;
- Bounce rates relative to organic traffic;
- Session depth;
- Time to purchase; and
- Conversion propensity indicators.

At a minimum, Google should clearly label referrals originating from generative AI features and enable publishers to independently calculate commercial value metrics. Without such information, publishers are unable to assess the trade-offs associated with permitting the use of their content in generative AI services, and the concept of informed choice is materially weakened.

Attribution That Preserves Brand Value and Trust

Attribution within search generative AI features must be accurate, prominent and actionable. It is insufficient for a publisher to be technically cited if the attribution lacks prominence or fails to support user engagement.

Google should publish metrics and information relating to:

- Attribution prominence (for example, viewport placement or relative visual positioning);
- The share of AI responses in which a publisher is cited;
- Attribution click-through rates compared with organic CTR benchmarks;
- Accuracy correction rates; and
- Time to correction following error reports.

In addition, Trainline supports the introduction of a structured mechanism within Search Console allowing publishers to communicate the reasons for opting out of grounding or display. This should enable publishers to indicate, for example:

- Factual inaccuracies;
- Insufficient or misleading attribution; or
- Reputational risk concerns.

Such a mechanism would improve Google's incentives to correct deficiencies, reduce reputational harm and support compliance monitoring.

Importantly, Trainline considers that attribution transparency should extend beyond source citation to encompass how brands are represented within AI-generated responses. Generative summaries do not merely reference content; they frame and characterise brands in ways that may materially influence consumer perception and purchasing behaviour. The language used to describe a service — including comparative or evaluative qualifiers — may affect consumer trust and conversion decisions.

Google should therefore provide publishers with outcome-based visibility into:

- The frequency with which their brand is referenced in AI-generated responses;
- The context and tone of such references;
- Whether descriptions are neutral, comparative or evaluative; and
- The relative positioning of their brand compared with competitors.

This would not require disclosure of proprietary model systems, but rather structured transparency regarding AI outputs. Such visibility is particularly important in sectors such as travel and transport, where descriptors such as “official provider”, “cheapest option” or “third-party reseller” may materially influence user behaviour.

Absent such transparency, publishers may be unable to identify whether generative summaries are inadvertently distorting competitive perception, even where formal attribution is present.

Consumer Benefits and Market Sustainability

Trainline agrees with the CMA's assessment that effective publisher choice and robust attribution standards are likely to support broader consumer benefits.

In sectors such as travel and transport, the factual accuracy of AI-generated responses is safety-relevant. Incorrect summaries may mislead consumers on price, availability or ticket validity. Prominent and accurate attribution enables users to verify information and builds trust in AI-assisted search experiences.

More broadly, the ability of publishers to exercise meaningful control and to receive sustainable commercial value from their content supports continued investment in high-quality information. This contributes to pluralism, market sustainability and consumer choice over the longer term.

User Choice

6. Questions for consultation

6.1 We welcome views on any aspect of the User Choice CR design or analysis set out above, but are particularly interested in stakeholder feedback on the following questions:

(a) Do you agree with the key design options we have considered in terms of effectiveness for the User Choice CR, including:

(i) Coverage of the Search Choice Screen

Comprehensive coverage is essential. Trainline supports expanding the Search Choice Screen to all relevant access points, including Chrome on desktop and iOS/iPadOS.

Limiting coverage to Android devices would fail to reflect the reality of multi-device search usage and therefore materially reduce effectiveness. From a commercial perspective, significant volumes of high-intent travel queries occur on desktop and iOS environments. If distribution power remains entrenched in those environments, competitive pressure on Google Search will remain limited. Expanding coverage to Chrome on desktop and iOS/iPadOS is therefore critical. Without full coverage across relevant access points, the CR risks being symbolic rather than structurally impactful.

(ii) Eligibility criteria to appear on the Search Choice Screen

Trainline broadly supports the proposed eligibility criteria and the introduction of a search default setting API. The key requirement is that eligibility be applied transparently and neutrally, with appropriate CMA oversight.

(iii) Determination of the list of eligible providers that would appear on the Search Choice Screen, and what role (if any) the CMA should play in that process

Trainline considers that Google determining eligibility without meaningful regulatory oversight presents risks.

While we recognise practical constraints, the CMA should retain:

- Oversight of eligibility criteria application;
- Visibility over rejected applications;
- Power to intervene where exclusion decisions appear strategically motivated.

Google should be required to:

- Notify the CMA of rejected applications with reasons.
- Provide sufficient documentation to allow independent review.

Given Google dual role as both gatekeeper and competitor, independent scrutiny is essential to ensure that eligibility processes are not used to disadvantage emerging rivals.

(iv) Frequency of display and timing of the Search Choice Screen

Trainline strongly supports the proposal to resurface the Search Choice Screen at least annually, in addition to display at device set-up. One-time choice at set-up is insufficient in a market characterised by rapid

innovation, evolving consumer behaviour and long device lifecycles. Limiting user engagement to the initial configuration moment effectively entrenches historic defaults.

Annual resurfacing achieves several important objectives:

- It enables users to reconsider their preferences in light of new market entrants or technological developments.
- It mitigates long-term inertia.
- It increases the probability that emerging competitors can reach scale.

From Trainline's perspective, even incremental shifts in user engagement can increase competitive pressure on Google Search. Over time, this may influence advertising dynamics and reduce the structural advantages associated with default entrenchment. The proposal to provide advance notice of annual display to eligible providers is also welcome. Predictability supports effective market participation.

Google's concern regarding "user fatigue" should be viewed in context. Google already surfaces multiple prompts across its ecosystem. A once-per-year choice screen is proportionate.

(v) Design of choice architecture on the Search Choice Screen

Trainline supports the CMA's proposed design principles of targeted, understandable and balanced choice architecture. Balanced presentation is essential. Visual or behavioural framing that subtly favours Google Search would undermine the objective of effective user choice.

Similarly, prompts displayed by Google must be neutral and not unduly discourage switching. While user security considerations are legitimate, prompt design should not introduce asymmetric friction that reinforces the incumbent position. Choice architecture must be neutral in practice, not just in principle. Strict neutrality in implementation must be enforced.

(vi) Option to 'test-drive' search providers on the Search Choice Screen

Trainline supports the inclusion of a time-limited 'test-drive' option. Search services are experience goods, and enabling users to trial alternatives may reduce informational barriers to switching. Trial periods can also reduce inertia, provided they are not undermined by nudges. While implementation details should remain proportionate, the principle is aligned with encouraging informed and active choice.

However, the effectiveness of test-drive depends on:

- Seamless switching implementation;
- No friction in reverting choices;
- No countervailing prompts steering users back to Google.

If Google retains the ability to deploy unbalanced prompts post-test-drive, the practical impact may be diluted.

(vii) Device-level consumer journey to change default search provider on Android devices

Trainline strongly supports introduction of a device-level default setting for search. Simplification of the switching journey is a necessary complement to the choice screen. The CMA's assessment identifies that default search settings must currently be changed separately across access points. This fragmentation creates cumulative friction that discourages meaningful switching.

Introducing a device-level default setting on Android would materially reduce switching costs and align search defaults with how browser defaults operate. The ability to change default settings across relevant access points through a single, accessible setting is fundamental to ensuring that user choice is not undermined by technical complexity.

Effective competition in search requires that switching not only be possible in principle but realistic in practice. Without simplification of the consumer journey, the competitive impact of the Search Choice Screen may be muted.

(viii) Third-party access to a user's default search setting

Trainline supports introduction of a default search setting API. Current asymmetry, where only Google knows default status disadvantages third parties in engaging users. Equal access to default-setting visibility is a basic competitive neutrality requirement. Safeguards around frequency limits and user consent are reasonable.

The API should:

- Provide real-time or sufficiently frequent visibility.
- Be available on equivalent terms to Google's own internal visibility.
- Not degraded by restrictive access conditions.

(ix) Prompts displayed by Google that may inhibit effective user choice

Trainline supports requiring neutral and balanced prompts. While security protections are legitimate, prompts must not:

- Frame switching as risky;
- Encourage reversion to Google;
- Create asymmetric friction.

Given Google's control over interface language and framing, prompt neutrality is critical. Switching away must be as simple as switching back.