

Introduction

This document represents a submission to the CMA's consultation: "*Google's general search services: proposed conduct requirements*". The submitting party welcomes the CMA's proposed conduct requirements in relation to Google's general search services, as the regulator seeks to achieve the three statutory objectives under the Digital Markets, Competition and Consumers Act 2024.

Overview

The submitting party is a leading UK-based fintech and digital comparison platform. Its services enable individuals to access competitive deals and achieve positive outcomes across insurance, utilities, and money products.

The platform has significant reach across the UK. Over recent years, a substantial proportion of UK households have used its services, generating billions of quotes annually for tens of millions of consumers.

As a technology-enabled intermediary that enhances competition, the submitting party is committed to markets that are fair, open, and operate in the interests of consumers. Any restriction on these principles would hinder its ability to champion consumer outcomes and to ensure that consumers retain meaningful market power relative to providers. It is therefore essential that the UK retail financial services market remains dynamic and competitive, with a diverse range of product providers and intermediaries delivering innovation-led, consumer-focused services that are firmly in the public interest.

General search services play a fundamental role in this ecosystem, increasingly acting as the primary point of access between businesses and consumers online. The submitting party is one of the largest search advertisers in the UK and is therefore highly reliant on Google's general search services. Regulatory intervention to ensure fair and open competition is welcomed.

Paid search advertising drives a substantial proportion of website traffic for the submitting party. While Google offers efficiency and scale and remains the primary route through which consumers discover the platform, concerns exist regarding a lack of transparency in certain tools and practices. In some areas, these practices appear to facilitate economic rent-seeking behaviour that increases costs for businesses and ultimately places upward pressure on consumer prices.

A particular concern relates to the treatment of businesses' own brand names. Limited transparency around pricing mechanisms leaves advertisers exposed to inflated costs, including the need to bid defensively on their own brand terms simply to maintain visibility. For the submitting party, such defensive spending represents a significant and ongoing cost and exceeds expenditure in other marketing channels. While these costs are not directly passed on to consumers, they inevitably influence pricing and investment decisions, contributing to a less competitive marketplace.

Similar transparency concerns arise in relation to the ranking of generic search terms and the ordering of paid advertisements on search engine results pages. Cost-per-click levels have increased significantly year on year in some categories, without clear explanation. The introduction of AI-driven features has further crowded results pages, pushing organic listings downwards and increasing reliance on paid-for placements.

Proposed Conduct Requirements

Fair Ranking Conduct Requirement – Overarching Position

The submitting party shares stakeholders' concerns regarding the ranking of organic search results and supports the objectives underpinning the Fair Ranking conduct requirement. At present,

businesses must rely on trust that ranking systems operate fairly, with limited ability to assess this in practice.

There have been repeated instances of limited transparency, including algorithm volatility and a lack of clear guidance on ranking determinants and changes. Guidance provided by Google is often high-level and vague, making it difficult for businesses to target consumers efficiently. The proposed conduct requirement is therefore necessary to ensure objective and non-discriminatory criteria for organic rankings, enhanced transparency, and an effective complaints mechanism.

However, significant concerns remain regarding the ranking and presentation of paid-for content. While it may not be appropriate to subject paid-for content to the same framework as organic results, the submitting party considers that a separate and tailored set of requirements for paid-for content should be considered.

Response to Specific Questions

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*
- ii. Eligibility criteria to appear on the Search Choice Screen*
- 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*
- iv. Frequency of display and timing of the Search Choice Screen*
- v. Design of choice architecture on the Search Choice Screen*
- vi. Option to 'test-drive' search providers on the Search Choice Screen*
- vii. Device-level consumer journey to change default search provider on Android devices*
- viii. Third-party access to a user's default search setting*
- ix. Prompts displayed by Google that may inhibit effective user choice*

N/A.

Do you agree with our proposals for compliance reporting and monitoring, in particular:

- a. Do you agree that Google should provide 6-monthly compliance reports with metrics identified above broken down into monthly periods?*
- b. Do you agree that Google should provide a copy of any correspondence sent to a potential search provider rejecting their application to the CMA?*

N/A.

Do you agree with our proportionality assessment for the User Choice CR?

N/A.

What are the likely costs for OEMs arising from each of the design elements set out in this chapter?

N/A.