FuzeBox

Response of FuzeBox AI, Inc. to the CMA Consultation on Google's General Search Services: Proposed User Choice Conduct Requirement

About FuzeBox: FuzeBox AI helps organizations, including news publishers, govern, measure and verify how AI systems access and use their content, and provides evidence suited to pricing and enforcement. We operate independently of the platforms we measure, have a commercial interest in this work, and disclose it here. Our comments concern verification only and apply regardless of who performs it.

Summary: We support the CMA's updated proposal, particularly the new interpretative notes requiring generative AI summaries to attribute web content clearly and accurately and to keep error rates low (Notes 31–33). We ask the CMA to ensure these standards are verified independently, rather than assessed solely by the firm with strategic market status. Specifically, we ask the CMA to (1) require that the Note 33 testing process be designed or validated by an independent party using a published method and query set, and (2) amend the Publisher CR compliance reporting notice so that audits relied on for compliance are performed by a party independent of Google, with methodology and results published.

The standard needs an independent measurement method. Notes 31–33 of the consultation document set the right bar: clear, accurate attribution with a means for users to reach the source, an error rate that is not significant, and a replicable testing process across use cases. However, Paragraph 12 of the proposed requirement leaves eligibility decisions to Google, which competes with every applicant. We welcome the safeguards the CMA has already added, including reasoned eligibility decisions reported to the CMA (para 12.c.ii) and para 4.33, and we share the concern at para 4.9 that requirements should not exclude smaller providers. Testing should therefore be proportionate. Without a defined, independent test, the standard risks being applied unevenly.

The evidence shows the gap is material. Research from Washington University in St. Louis broke Google AI Overview responses into 98,020 individual claims, drawn from 55,393 queries, and found 11.0% unsupported by the pages cited. Omission of relevant information was the dominant failure mode. If rival providers are held to an attribution-accuracy standard, the method and benchmark should be transparent and comparable across all providers, including Google.

Our requests:

Independent attribution testing. Specify that the Note 33 testing process is designed or validated by an independent party, using a published methodology and query set, with results that can be replicated across providers.

Independent verification of compliance reporting. The Publisher CR compliance reporting notice already asks Google to disclose whether internal or external audits were carried out, and to provide audit methodology and results (para 10(c)). We ask that audits relied on for compliance be performed by a party independent of Google with methodology and results published in the non-confidential report that para 19 of the notice expects Google to publish. The CMA can achieve this by amending the notice under para 21. We ask for the same treatment of reporting under the proposed User Choice CR (paras 4.113–4.116). Respondents including Mozilla and Which? supported behavioral audits of the user journey and choice architecture (para 4.110(c)); attribution audits extend that principle to the accuracy of AI summaries.

Consistency with the Publisher CR. Apply the same independent verification principle to the attribution obligations in the Publisher Conduct Requirement (para 8), against which Google reports under para 13(a) of the notice, so that Google's own performance is measured the same way as its rivals'. Notes 31–33 apply to rival providers; the Publisher CR is the source of Google's own duty, so the same independent method holds both to one standard.
Timing: Under the Publisher CR compliance reporting notice, Google's first reporting period closes on 3 December 2026, with its first compliance report due 3 January 2027. Setting the verification expectation now avoids building the first cycle on self-assessment.

We would welcome the opportunity to discuss methodology with the Digital Markets Unit.

This response contains no confidential material and may be published in full.

Sincerely,

[redacted]

CEO and Co-Founder

FuzeBox AI, Inc.

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References

- CMA consultation page (closes 5pm, 9 October 2026): https://www.gov.uk/government/consultations/googles-general-search-services-proposed-user-choice-conduct-requirement
- CMA consultation document (Notes 31–33, para 4.9, para 12, para 4.33, paras 4.110–4.116): https://assets.publishing.service.gov.uk/media/6ab29c76fe72ed1e2b02eebe/consultation_user_choice_conduct_requirement.pdf
- CMA case page, Google's strategic market status in search: https://www.gov.uk/cma-cases/sms-investigation-into-googles-general-search-and-search-advertising-services
- Xu et al., Washington University in St. Louis, "Measuring Google AI Overviews: Activation, Source Quality, Claim Fidelity, and Publisher Impact" (preprint): https://arxiv.org/pdf/2605.14021
- CMA January 2026 consultation on Google's conduct requirements, including the Publisher CR: https://www.gov.uk/government/consultations/googles-general-search-services-proposed-conduct-requirements
- Publisher Conduct Requirement, final decision (para 8): https://assets.publishing.service.gov.uk/media/6a1f0098b95db968c8f3bdb9/Publisher_CR_final_decision.pdf
- Publisher CR compliance reporting notice (paras 10(c), 13(a), 19, 21): https://assets.publishing.service.gov.uk/media/6a1ec37a916cd732dcdaae30/_Publisher_CR_Compliance_Reporting_Notice_.pdf