PrıiRata

ProRata.ai's Response to the Consultation: User Choice Conduct Requirement – Google's general search services by the Competition and Markets Authority

9 October 2026

I. Introduction

1. ProRataAI, Inc., ("ProRata.ai") is pleased to respond to the consultation that has been put forward by the U.K's Competition and Markets Authority (CMA) on the proposed User Choice Conduct Requirement for Google's general search services.

2. ProRata.ai was founded in 2024 with headquarters in Pasadena, California. ProRata.ai has invented and developed multimodal attribution technology that allows for the AI-based outputs of large language models (LLMs) to be attributed back to the original source content.

3. Since its founding, ProRata.ai has worked to develop deep ties to the United Kingdom through relationships with a number of leading UK media companies. In August 2024, ProRata.ai announced interest from the Financial Times[1], followed by an announcement in November 2024 of engagements with dmg media, Sky News, Guardian Media Group, Reach PLC, Prospect Magazine, Mumsnet, "hello!" and Exponential View[2]. Since then, additional UK Publications, including Iliffe Media Group and GB News, have signed on to work with the Company. ProRata.ai is also pleased to count dmg media's venture arm among its investors, representing the first commercial partnership that dmg media has made in any generative AI platform.[3]

4. ProRata.ai believes that it offers a unique perspective on how generative artificial intelligence impacts search behaviour and user trust, as we straddle the worlds of AI technology and content creators. This is clearly reflected in our company's mission, "To protect and advance human creativity in the AI era."

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[1] See https://www.businesswire.com/news/home/20240806000889/en/ProRata-Invents-Generative-AI-Attribution-Technology-to-Compensate-and-Credit-Content-Owners-While-Facilitating-Fairness-and-Fact

[2] See https://www.businesswire.com/news/home/20241119176784/en/Major-UK-Media-Organizations-Join-ProRata%E2%80%99s-Movement-to-Credit-and-Compensate-Content-Owners-in-the-Age-of-Generative-AI

[3] See https://www.dmgmedia.co.uk/news/dmg-media-makes-first-generative-ai-investment/

5. ProRata.ai's responses to the consultation will be limited to the policy areas where we can meaningfully contribute expert opinion. As a result, our response is limited to paragraph 31 in the interpretive notes:

   "31. Furthermore, Eligible Providers must ensure that any generative AI summary responses are configured and operated in such a way to ensure that web content is attributed clearly, accurately, and that end Users are provided with a clear means to access that web content. There are a wide range of ways such attribution may be achieved and each Eligible Provider should be able to determine its preferred approach."

6. ProRata.ai strongly supports the requirement that for generative AI-based services to be included as an Eligible Provider, they must provide clear and accurate attribution at a minimum. ProRata.ai opposes any effort to weaken this requirement and would argue that the CMA should consider strengthening this requirement due to the differences between traditional search services and generative AI search services. Unlike traditional search services that are used as a discovery mechanism for end users with end users clicking on search result links to find results, generative AI search services provide fully formed answers to end users. This distinction is important because of the difference in user behaviour: traditional search services represent a portion of the journey to answer the user's query whereas generative AI search services is often the final destination.[4]

7. Because generative AI search services serve as a substitute, it is critical that end users can trust the output that is presented to them. Despite improvements, AI services continue to "hallucinate" in offering wrong, misleading or inaccurate information. The only way for end users to verify these responses is through attribution and a clear means to access the original web content. Accurate data related to attribution is also a requirement for publishers of content to understand how generative AI services have used their content.

8. In exchange for the significant benefit that is being granted to generative AI-based services in designating them as an Eligible Provider, we believe that it is within the CMA's remit to consider additional requirements beyond those that have been outlined in paragraph 31. These requirements aim to directly address the harm that generative AI services is causing to publishers and other content creators that directly arises due to the difference in user behaviour between traditional search and generative AI search services. These requirements at minimum should include mandatory disclosure of attribution data (similar to the Google search publisher conduct requirement imposed by the CMA on 3 June 2026); additional requirements that should also be considered include compensating publishers for the usage of their content, with attribution data serving as the method to calculate output-based compensation.

[4] See https://pressgazette.co.uk/comment-analysis/google-search-traffic-to-leading-uk-publishers-set-to-halve-by-q3-2027/