Response to the CMA consultation on Google's General Search Services: Proposed User Choice Conduct Requirement

REDACTED welcomes the CMA's willingness to amend its proposals in light of market developments – including the significant changes taking place on Google Search – and the concerns expressed by publishers about the importance of search services attributing content clearly. We broadly support the revised approach, particularly its more technology-neutral approach to eligibility. However, some aspects require further refinement to ensure the User Choice CR is effective and does not inadvertently entrench Google's existing advantages.

These issues are particularly relevant to REDACTED. Google Search remains a critical gateway through which consumers discover, compare and access REDACTED services. Its dominance in online search and the lack of effective competition in that market has been central to its ability to self-preference its own competing REDACTED search services and offer advertising products that are simultaneously more expensive and less transparent. It is also why Google has been able to use search content to generate generative AI responses without offering publishers control over the use of their content for a purpose that goes beyond traditional search. We agree that improving competition in the search market is likely to lead to significant consumer and business benefits, including potentially lower advertising costs for businesses that currently remain reliant on Google Search for a large share of their traffic. We agree that the User Choice CR could be effective at achieving this increased competition in general search, and view the proposals as complementary to the other Conduct Requirements that have been imposed on Google to date.

The convergence of general search and AI assistants

REDACTED agrees with the CMA that the distinction between traditional search services and AI-based services is increasingly blurred. Google Search increasingly incorporates functionality associated with AI assistants, including AI Overviews and AI Mode, while Gemini is increasingly integrated into the same Google ecosystem and consumer access points as Google Search.

This convergence is already relevant to REDACTED search. Google is showing AI Overviews in response to a growing share of both informational and transactional REDACTED prompts, while it has made clear that its intention is for users to be able to search, plan, compare and book REDACTED all within AI Mode, including via search agents. Meanwhile, users are increasingly using AI assistants to research and plan REDACTED, responding to combinations of navigational, transactional, and informational queries. These services offer new opportunities for REDACTED businesses to reach end users, and they can also present users with more objective results given the fact they do not have their own REDACTED services to self-preference. Making it easier for consumers to switch between search providers could improve the REDACTED search, planning and booking experience across search services, as providers – including Google – have to compete to provide the best experience for both end users and businesses.

In these circumstances, the fact that an AI assistant can perform functions other than search should not prevent it from being treated as a search service where it performs the functions of general search. We therefore welcome the CMA's proposal to remove the requirement that general search must be a "core and central" part of an eligible service, and we share the CMA's analysis that changes to Google Search make this criterion somewhat redundant. Whether a service can serve the use cases of a search service should be determinative, rather than how services are marketed, which can lead to the exclusion of valid alternatives and provides greater scope for any application process to become overly subjective.

This convergence between search services and AI assistants also requires the CMA to keep the scope of Google's SMS designation under active review. If Google were to judge that Gemini meets the eligibility criteria established under this CR for inclusion in a Search Choice Screen, the CMA should treat this as evidence that Gemini now falls within the relevant digital activity and move promptly to consult on bringing it within scope of the existing designation. This would further align the way in which users access Google Search and Gemini, (and would come on top of significant convergence on this point already, with Google Search and Gemini both accessed through Chrome already) while confirming that users are using Gemini for search purposes. And Google announced in May 2026 that Gemini had reached 900 million monthly users. On all the evidence points the CMA said it would consider before bringing Gemini into scope, we believe there is sufficient evidence for Gemini to be brought into scope.

Google's distribution advantages

The User Choice CR should be considered against the backdrop of Google's substantial distribution advantages, which raise barriers to entry and expansion in both traditional search and AI assistant search. Google Search benefits from control or influence over an extensive ecosystem of consumer access points, including defaults on Chrome, Android, and Maps, alongside important distribution arrangements on third-party devices and services such as Safari. These advantages can materially affect the ability of competing search and AI services to reach users and achieve scale. Google's AI assistant, Gemini, increasingly benefits from this too – it is now integrated into Chrome (through the 'Ask Gemini' feature) and Siri, and Google Search increasingly invites consumers to try Gemini for some of the tasks they had navigated to Google Search for (including a recent link on the UK homepage asking users to plan their next REDACTED on Gemini).

This matters directly to the REDACTED sector. Even with the rise of AI assistants, Google Search remains a vital point of entry into the consumer REDACTED journey and sits upstream of many REDACTED businesses and intermediaries competing for consumers. Google also operates its own services within parts of that same journey, which it privileges in both ranking and display on Google Search. It also privileges its own services on Gemini, such as by only surfacing [redacted] results for transactional queries for logged-in (i.e. the majority) of users. Given the way in which consumers are directed at the search layer can affect competition between businesses further downstream, providing greater choice for users over their search service could have a positive impact on competition in downstream markets – further increasing the consumer benefits of the draft CR identified by the CMA.

Effective choice architecture can contribute to reducing barriers to entry and expansion. Greater competition in general search could also benefit businesses that depend upon search to reach consumers, including through stronger competitive pressure over advertising prices and the treatment of business users. The benefit of any fall in advertising prices could be especially large now and going forward. That is because self-preferencing and the introduction of AI features into Google Search has fundamentally reduced the amount of organic traffic and required businesses to spend more on sponsored results to maintain visibility. As more businesses bid on ads, the cost of advertising itself has also increased. And Google has been able to command higher prices while simultaneously providing advertisers with less transparency and control over their spending. They are only able to do this because there is no meaningful alternative for businesses to acquire customers at the scale and level of user intent offered by Google Search.

Enabling AI assistants, some of which are the first services to grow to a scale even remotely comparable to Google over the last two decades, to better compete with Google Search could provide a feasible alternative for businesses to reach end users on a more sustainable and fair basis.

However, the User Choice CR is only one part of the solution. Consumer habits can take considerable time to change, while Google will retain substantial distribution advantages on access points not covered by this draft CR. The CMA should therefore monitor the effectiveness of the CR in practice rather than treating implementation of a choice screen as an end in itself.

Eligibility criteria and transactional search

REDACTED supports technology-neutral eligibility criteria and broadly supports the proposed use cases in paragraph 29 of the Interpretative Notes. However, we have concerns about the inclusion of "transactional queries", described as queries "to find a product or service a User may wish to buy".

This criterion is particularly relevant to the REDACTED sectors. A general search service has traditionally enabled consumers to identify and access third-party businesses offering relevant products and services. It does not follow that the search provider must itself provide a specialised comparison, intermediation or transactional service – which is the implication of the decision to include an ability to respond to transactional queries.

REDACTED illustrates the distinction particularly clearly. A consumer searching for REDACTED may be served by a general search engine directing them to a range of relevant REDACTED. The search engine does not itself need to replicate those businesses' specialised functionality in order to answer the consumer's search query effectively.

Just because Google has progressively integrated its own vertical search services and features directly into its Search Engine Results Page (SERP), does not mean that these features are a general search use case. The ability to help consumers find specific products or services is not a determinative feature of a general search service, and indeed Google's existence of a multitude of long-established vertical search services means that Google search products may be at an unfair advantage from the inclusion of this use case.

As the European Commission made clear in its July 2026 decision on Google Search and its compliance with Article 6.5 of the Digital Markets Act (DMA), enabling users to find and compare individual products and services serves a purpose that goes beyond that of a general search service, and the integration of such features into a SERP does not prevent these from serving a functionally different role to general search. Similarly, users only expect general search services to enable them to find individual products and services because Google has shaped their expectations over decades. If the intention of the CR is to make it easier for search providers to compete with Google Search, we do not believe it is appropriate for the eligibility criteria to be unnecessarily influenced what Google Search believes constitutes a search service.

Furthermore, requiring an applicant to "adequately" address transactional queries (to be determined by Google) could amount to requiring competing services to replicate Google's vertically integrated product architecture, or disadvantage those that do not have integrated vertical search offerings. Doing so could create a perverse outcome in which Google's expansion from general search into downstream vertical services becomes an advantage in determining which of its search competitors qualify for the choice screen.

Alternatively, if the CMA is to keep this use case, it should make clear that for a service to "adequately" allow a user to find a product or service a user may wish to buy, it must – in response to transactional queries - enable users effectively to discover products or services offered by a wide range of third parties and to access those third-party services. This would mean that services that only source content from their own specialised search services in response to transactional queries cannot appear in the Search Choice Screen. The assessment should focus on the consumer need being met, rather than whether a competitor replicates Google's particular approach to vertical search.

This is important to protect competition in downstream markets and would ensure that eligible search providers provide a suitable search experience for businesses and consumers, in the same way the attribution requirements protect the interests of publishers and consumers. Such an addition is especially important as agentic AI is integrated into more of these search services: given the potential for considerable consumer harm, services must be able to answer transactional queries in a way that is transparent and fair (which includes being representative of the relevant offers available).

Attribution and access to third-party content

REDACTED strongly supports paragraph 31 of the proposed Interpretative Notes, under which eligible providers using generative AI summaries must ensure that web content is clearly and accurately attributed and users have a clear means of accessing that content. This is essential for services to be able to provide responses to navigational queries, for example, as well as supporting consumer confidence in the accuracy and reliability of alternative search services (by offering them a means to corroborate an AI answer).

This is an important safeguard for businesses operating in sectors such as REDACTED, where third-party websites invest significantly in creating information, comparison tools and services that help consumers make complex purchasing decisions. The content we produce is essential to enabling search services (broadly defined) to generate AI summaries, yet by answering a user's query directly these summaries mean consumers have less reason to visit the businesses and publishers whose content is essential to generating those answers. Indeed, AI assistants currently provide significantly less referral traffic to third-party websites than traditional search.

Without this attribution requirement as part of the eligibility criteria, there would be a risk that this User Choice CR could further undermine the ability for publishers to see a fair return on their investment in content – if it led to more users setting AI assistants as their default search service.

The REDACTED journey frequently involves considerable research before a transaction takes place. Consumers may move between REDACTED before deciding what to purchase. Search referral traffic therefore does more than facilitate an immediate transaction: it enables consumers to discover and assess competing services throughout that journey. It is important for both consumer choice and competition that search services provide a navigational and discoverability function.

The CMA should therefore retain paragraph 31. In fact, we believe it is so important to the aim of the CR (because it will improve UK users' confidence in alternative search providers by helping them to identify the sources behind the AI summaries they are being shown) that we think the CMA should move it into the text of the CR itself. A "clear means to access" should mean more than the technical presence of a citation: links and attribution should be sufficiently prominent and usable to provide a meaningful route to the underlying third-party content, and they should not require an additional step on the part of the user to view them. Ease of navigation to third-party websites has always been a core feature of a general search service.

Security requirements

REDACTED supports appropriate minimum-security standards but questions the CMA's proposal in paragraph 37 that these requirements should be specified by Google.

Google is both the operator of the application process and a competitor of providers applying for inclusion. It also sets the technical specifications of the platforms that these search services must be able to interoperate with. It should not have unrestricted discretion to also establish security requirements which determine whether competitors obtain access to this important distribution mechanism.

This concern will be familiar to businesses operating in REDACTED markets, where access to an important upstream gateway can materially affect the ability of downstream businesses to compete. Eligibility conditions controlled by the operator of that gateway therefore require particularly careful scrutiny, and greater transparency and oversight by the CMA.

Any requirements should be objectively necessary, proportionate, transparent and non-discriminatory, and subject to CMA oversight. The CMA should be able to assess whether a requirement characterised by Google as necessary for security is genuinely required, proportionate and applied consistently.

The third eligibility criterion

REDACTED also questions the need for the third eligibility criterion: that a provider must "be considered by a significant proportion of UK users of the service to provide a general search service". If a provider can adequately address the relevant use cases and provides a functioning search service, it is unclear what additional purpose is served by requiring evidence that users already conceptualise it as "general search".

This is particularly problematic in the rapidly evolving search market. Consumers may use an AI assistant to perform precisely the same discovery functions they previously performed through a search engine without describing the service as a "general search service". REDACTED provides a straightforward example: a consumer asking an AI assistant to identify REDACTED may functionally be searching, irrespective of how they would categorise the service in response to a survey. REDACTED therefore questions the use of attitudinal evidence under this criterion, which in any case has been shaped by the dominant player in general search for over two decades. Objective functionality, technical capability and – at most - behavioural evidence provide a more reliable basis for assessment.

User attitudes evolve over time, can vary by demographic group, and can be shaped both by the practices of dominant incumbents and by how services are marketed. They are subjective rather than objective, as the European Commission explains convincingly in their final decision regarding Google's compliance with Article 6.5 of the DMA.

Furthermore, this criterion also potentially raises barriers to entry and expansion for smaller or AI services, which may be excluded from a Search Choice Screen despite being technically capable of serving all relevant search use cases. And it ignores the role that the Search Choice Screen can play itself in shaping consumer attitudes: inclusion of such services may, over time, shape consumer attitudes to the nature of a given service – thereby supporting its growth and lowering the barriers to entry and expansion and boosting competition in search. If Criterion 3 is retained, the CMA should remove the reference to attitudinal data in the interpretive notes and clarify that applicants themselves, rather than Google, can provide the relevant behavioural evidence. Applicants could be invited voluntarily to provide appropriately aggregated UK usage data to Google and the CMA. This would both assist Google's eligibility assessments and give the CMA greater visibility over changing search behaviour and Google's administration of the process.

Oversight of Google's application process

REDACTED welcomes the safeguards requiring Google to operate a clear, fair, robust and transparent application process and provide the CMA with its decisions and reasoning for rejections. It is also welcome that the CMA amended its proposals to provide more detail on the process and to increase its level of oversight compared to the January 2026 proposals. However, there is an inherent tension in allowing the SMS firm to determine whether competing providers are eligible for an intervention designed to improve competition with that firm.

This is particularly significant where decisions at the search level can have consequences for competition in downstream sectors. Online REDACTED businesses already operate in an environment where visibility at key consumer gateways can materially influence customer acquisition and the ability to compete. The effectiveness of the User Choice CR should not therefore depend on Google's discretion over which competing search providers are permitted to participate.

The CMA should make clear that it will intervene if there is evidence that Google is applying the criteria restrictively, inconsistently or unfairly. This should include the possibility of the CMA taking over eligibility assessments, imposing substantially enhanced oversight or conducting an appeals process in which the CMA can overturn a decision by Google to reject an application. Applicants should also have a clear and rapid means of raising concerns with the CMA.

Prompts encouraging users to switch back to Google

REDACTED strongly supports paragraph 48 of the proposed Interpretative Notes. Once a consumer has chosen a competing provider, Google should not be permitted to undermine that choice through repeated prompts encouraging the consumer to switch back to Google Search or another Google search product.

We therefore support the CMA's proposed clarification that prompts may be used for legitimate purposes, such as informing users about changes to settings, but should not ask users whether they wish to switch to a Google search product. Indeed, it would be helpful in order to improve confidence among market participants if the interpretive notes provided further detail on the types of instances in which a prompt may be warranted – the current example, of informing users about changes they may not be aware of, is somewhat unclear: it is hard to identify a situation in which users who have had to actively choose their default search service would be unaware of changes to their default search settings.

This is important not only for competition between search providers. If alternative search providers are to develop viable business models and meaningful scale, users' choices need to be durable. Greater competition at the search layer can in turn create more diverse routes through which consumers discover businesses in downstream sectors such as REDACTED.

Gemini and the SMS designation

The CMA's analysis recognises that its conclusion regarding Gemini in the October 2025 SMS Final Decision reflected the evidence and Google's products and commercial decisions at that time. The market has since developed rapidly.

The CMA should assess Gemini against the functional criteria it now proposes for determining whether a service meets users' general search needs. This assessment should consider how consumers actually use Gemini, including for commercial discovery queries in sectors such as REDACTED. Google's own decisions - including placing links to Gemini on the Google Search homepage, offering Gemini in Chrome along with Google Search, and updating Google Search so that the Gemini-powered search generative AI features are ever more central – all indicate that Google is responding to users who are using the two services interchangeably.

If the CMA has sufficient evidence that Gemini meets those criteria, it should proceed promptly with the appropriate statutory process to consider bringing Gemini within scope of Google's SMS designation. Regulatory treatment should follow the economic and functional reality of the services concerned, rather than their branding or the technology through which equivalent functionality is delivered. In this way, the CMA can take a world-leading role in ensuring that new AI search services develop in a way that is more pro-competition and pro-growth from the start.

Consumer choice over AI-generated search results

Finally, [redacted] encourages the CMA to continue examining whether consumers should have greater control over the use of generative AI features within Google Search. As Google Search itself becomes increasingly AI-based, there is an important question about the meaning of consumer choice. A choice between services that increasingly prioritise AI-generated answers may not give consumers true choice, especially those who want a more traditional search experience centred on accessing and comparing third-party websites. Offering consumers the ability to tailor their Google Search experience would also, most likely, lead to higher engagement with the Search Choice Screen.

Again, REDACTED illustrates why this distinction can matter. REDACTED purchases are often complex, high-value and highly differentiated. Consumers may benefit from exploring multiple providers, comparing detailed information and accessing the underlying service directly rather than receiving a single synthesised response.

There is therefore merit in considering whether consumers should be able to opt out of features such as AI Overviews or AI Mode. If publishers can exercise control over whether they wish to participate in Google Search's search generative AI features, why shouldn't consumers have the same choice? It would also increase the range of search experiences available to consumers and provide an important signal about actual consumer preferences. This could complement rather than replace competition between search providers and provide an additional dimension of consumer choice. Given Google's commanding market share, and the relatively low number of users who typically switch search provider, this option would be the one most likely to lead to greater numbers of users actually exercising a choice to use a search service without AI features – which could also have important positive impacts on downstream markets.

We recognise, on the other hand, that enabling users to tailor their Google Search experience could limit the number of people who engage with other search providers that either do not have AI features, or who offer the option for users to turn them off. In this way, it could potentially reduce competition between providers. To address this, we see significant merit in requiring the Search Choice Screen to always contain a service that offers either a non-AI service or the ability for users to turn AI features off. This would ensure actual choice for consumers, and would likely lead to significantly higher engagement with the Choice Screen. Where no such provider has been approved as eligible by Google for legitimate reasons, then Google should be required to offer users the ability to turn off AI features on Google Search.

Conclusion

REDACTED broadly supports the revised User Choice CR and welcomes the CMA's efforts to make the framework technology neutral and responsive to the rapid evolution of search.

The experience of our members demonstrates why these issues matter beyond competition between search engines themselves. Search sits at a critical point between consumers and a diverse ecosystem of REDACTED. Effective competition at this gateway can support consumer choice and competition throughout the wider REDACTED sector; conversely, rules which entrench a vertically integrated search model risk having effects further down the value chain.

In finalising the requirement, the CMA should ensure that eligibility does not depend on replicating Google's vertically integrated search architecture; retain strong attribution and access requirements; subject Google's security and eligibility decisions to effective oversight; and place greater emphasis on objective functionality and behaviour than subjective consumer perceptions.

More broadly, the CMA should continue to respond to the convergence of traditional search and AI assistants, including by considering whether Gemini should fall within Google's SMS designation and whether consumers should have greater choice over the use of generative AI within Google Search.