



European Commission  
DG for Competition  
Antitrust Registry  
1049 Brussels  
BELGIUM

7<sup>th</sup> November 2023

Dear Commissioner Reynders

**DMA Enforcement and Google's Comparison Shopping Service**

Firstly, we congratulate you and your teams on completing the designation process under the Digital Markets Act ("DMA"), which is vital to the restoration of fair competition in many digital markets – not least, the markets for comparison shopping services ("CSS") in which we operate.

In particular, we applaud your designation of Google Search and Google Shopping as core online search and online intermediation service respectively.

We hope that these designations will stop Google's continuing self-preferencing in online search rankings, but Google's actions so far suggest otherwise. We are extremely concerned that unless the rules are enforced effectively and quickly, **Google's anti-competitive practices will continue**. That could sound the death knell for our industry, which has already contracted substantially as a result of Google's behaviour:

- (a) Google's units with paid results specialised on products (Shopping Ads) continue to provide Google's CSS directly on the search engine results pages (SERP) of its designated online search service. This is **contrary to Article 6 (5) of the DMA**, which says a gatekeeper shall not treat its own services more favourably than those of its rivals. At present, no rival CSS can compile and display equivalent units on the SERP, based on their specialised algorithms. Our websites are (still) demoted in organic results, unless they themselves become customers of Google's CSS.

- (b) Google is now **doubling down on this self-preferencing** and has begun placing yet more CSS functionality on the SERP through the display of new groups of results specialised in a comparison of products and prices, using grid-like formats with product and shopping results (“product grids) and large boxes with wide-ranging information and offers for particular products (“product viewers”). Both features are further interfaces of Google’s CSS that Google has embedded in its SERP. Some examples of these formats can be seen in the Appendix to this letter.
- (c) Google claims that placing CSS results within these units is equal treatment, but placing rivals within its own CSS service places them one or more steps behind Google in trying to attract users. Moreover, currently, it is Google alone who determines which products and prices of which offers appear on its SERP and the format and position of their display. Hence, it is Google who **provides the specialised comparison shopping service to end users** - not any CSS appearing in the units that Google displays. According to Recital (51), this practice is clearly illegal.
- (d) Furthermore, these new units take up so much of the SERP with Google’s CSS functionality that any remaining rival CSSs are automatically bumped down and suffer from even **further reduced visibility and a diminishing chance** to attract users to their competing services.

Far from becoming DMA-compliant, Google shows its contempt not just for competition in the CSS market, but for European consumers and the European institutions. Its behaviour goes directly against the European Commission’s vital work to ensure open competition in digital markets; it deprives European consumers of the benefits of more competition, greater choice, and lower prices exactly when they need them the most – during a cost of living crisis.

**We cannot wait until March 2024** when the DMA comes into force to put a stop to these practices **because they are harming us now**. We have spent more than a decade fighting Google on the Shopping case, and we continue fighting even as Google has methodically and irreversibly taken over our industry in that time. It is apparent that Google’s strategy is to play for time. If this behaviour persists, **we will be wiped out**. That is why we urge you to be swift and firm in your enforcement. The European Commission must take steps to ensure that Google cannot continue to ignore its obligations.

We remain confident in the DMA and in the European Commission’s ability to enforce it successfully and we stand ready to support the European Commission in bringing back competition and choice for European consumers in comparison shopping.

Yours sincerely

[Co-signed by CEOs]

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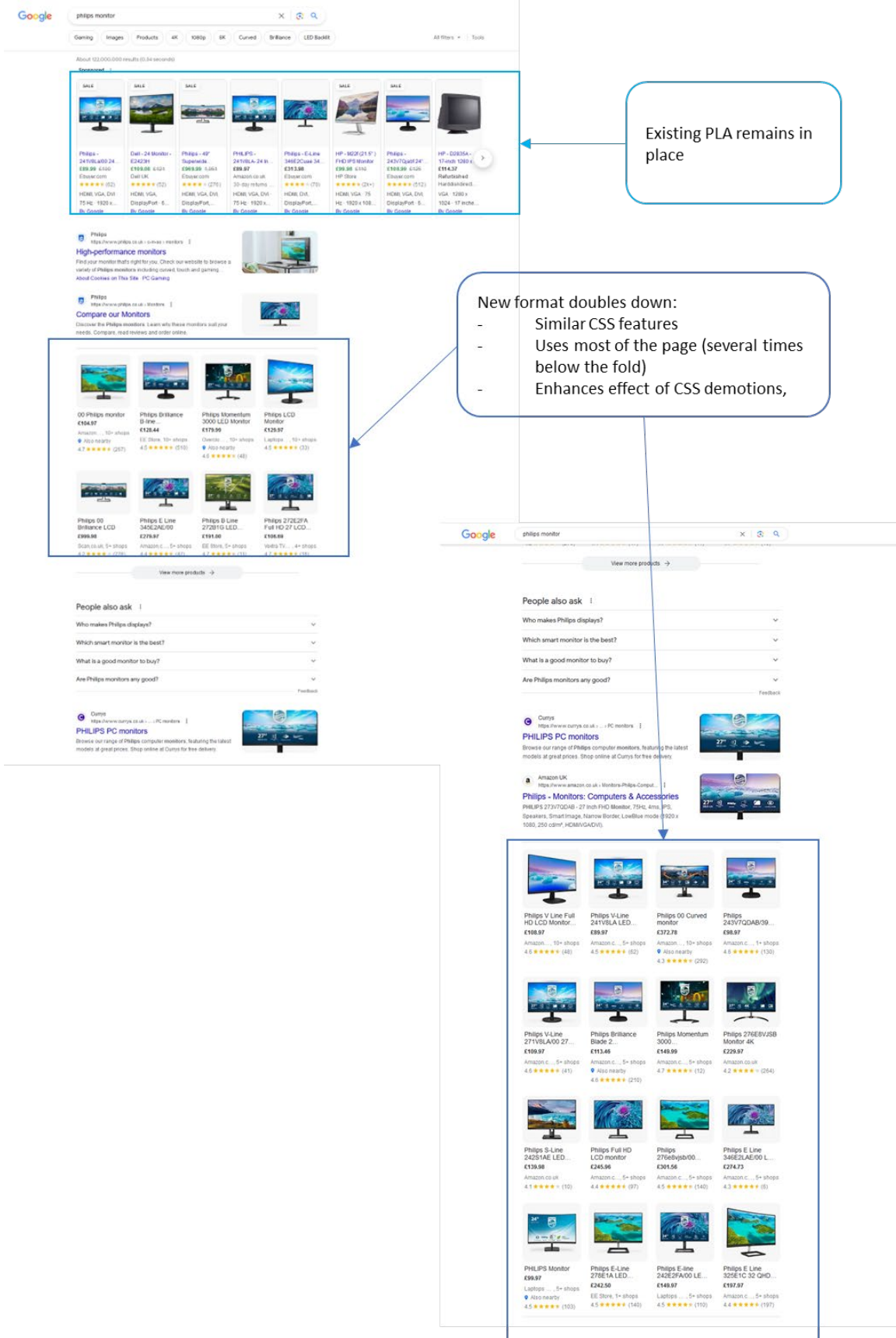
7Pixel srl

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 **trovaprezzi.it**

## Appendix: Screenshots





Clicking on one of the product results brings up the Product Viewer with further CSS-like features

Google search results for "philips monitor". The results include a list of products with images, prices, and ratings. A callout box points to the "More shops" button in the product viewer.

**Product Viewer Details:**

- Product Name:** Philips V Line Full HD LCD Monitor 243V7QJABF/00
- Price:** £108.97
- Rating:** 4.6/5 (48 reviews)
- More shops:** A button to view more retailers for this product.
- About this product:** A perfect all-around display with stunning images that stretch from edge to edge in a compact, slim design.
- User reviews:** A section showing user feedback, including a 4.6 rating and 48 reviews.
- Product description:** Philips 243V7QJABF - 24 inch FHD Monitor, 75Hz, 4ms, IPS, Speakers, Smart Image, Narrow Border, LowBlue mode (1920 x 1080, 250 cd/m², HDMI/VGA/DVI).

Whilst CSSs can appear, the interface is targeted towards comparing prices amongst retailers

See e.g. the 'More Shops' button

Where a search query is for a specific product, this unit is displayed by default, showing CSS like features.

The image shows a Google search for "philips e line 278e1a". The search results include sponsored product listings, a "People also ask" section, and a "Videos" section. A detailed product view for the "Philips 9C9" is shown, featuring a 4.5-star rating and a "Compare prices" button. A price comparison table is also displayed, listing various retailers and their prices for the Philips 278E1A00 27-inch 4K Ultra HD monitor.

Shop	Product	Energy level	Details	Delivery and costs	Item price	Est. total price	Visit site
EE Store By Google	Philips 278E1A00 27 inch IPS 4K UHD HDR DP - 278E1A00	Energy G	£149 delivery 14-day returns		£242.50	£242.50	Visit site
Balcom International By Checkatrade	Philips 278E1A00 E line 278E1A - LED monitor - 27" - 3840 x 2160 4K @ 60 Hz		Free delivery 14-day returns		£247.43	£247.43	Visit site
Wright By Google	Philips E-line 278E1A - LED Monitor - 4K - 27-inch		£10.99 delivery 30-day returns		£229.19	£240.18	Visit site
Laptops Direct By smac	Philips E-line 278E1A-27 IPS 4K UHD Monitor	Energy G	£5.99 delivery 14-day returns		£238.97	£244.96	Visit site
Mico By Google	Philips E-line 278E1A - LED monitor - 4K - 27"		£5.99 delivery 14-day returns		£245.59	£251.58	Visit site
Wille.co.uk By MCDirect.co.uk	Philips E-line 278E1A-27 IPS 4K UHD Monitor 278E1A00 Philips Black Monitors 8712261700008	Energy G	Free delivery		£256.97	£256.97	Visit site
LambdaTen By Google	Philips 278E1A00 - a line 278E1A00 computer monitor 68.6 cm (27")		£2.99 delivery 14-day returns		£253.27	£256.27	Visit site
JF4K.co.uk By Google	Philips 278E1A00 27" 16:9 4K UHD Monitor		£10.99 delivery 14-day returns		£233.88	£244.87	Visit site
Kelco By Google	Philips 278E1A - 27 inch 4K Monitor: 60Hz, 4ms, IPS, Speakers, Flickerfree, SmartImage (3840 x 2160, 300 cd/m², HDR10)				£238.95	£238.95	Visit site
Prime IT By Google	Philips E-line 278E1A - LED monitor - 4K - 27"		£5.99 delivery 14-day returns		£254.09	£260.08	Visit site
Transparent By Google	Philips E-line 278E1A00 computer monitor 68.6 cm (27") 3840 x 2160 pixels 4K Ultra HD IPS		Free delivery 14-day returns		£249.26	£249.26	Visit site
Fairhem.co.uk By Google	Philips 278E1A - 27 inch 4K Monitor: 60Hz, 4ms, IPS, Speakers, Flickerfree, SmartImage (3840 x 2160, 300 cd/m², HDR10)		£2.99 delivery 14-day returns		£251.69	£254.68	Visit site
www.PC3upgrade.co.uk By Google	Philips E-Line 278E1A-27 4K Ultra HD IPS Monitor		£2.99 delivery 14-day returns		£338.99	£341.98	Visit site
Quin UK By Google	Philips E-Line 278E1A computer monitor 68.6 cm (27") 3840 x 2160 pixels 4K Ultra HD IPS		Free delivery 14-day returns		£244.19	£244.19	Visit site
MoreCoCo By Google	Philips 278E1A00 27" Black LED Monitor 4K UHD Speakers DisplayPort Red		Free delivery 14-day returns		£245.99	£245.99	Visit site
Kingsfield Computers By Google	Philips E-Line 278E1A00 computer monitor 68.6 cm (27") 3840 x 2160		Free delivery		£254.09	£254.09	Visit site
Cherrywood AI By Google	Philips E-Line 278E1A00 computer monitor 68.6 cm (27") 3840 x 2160		Free delivery 7-day returns		£256.54	£256.54	Visit site
Netshop247.com By Productshere	Philips E-Line 278E1A00 computer monitor 68.6 cm (27") 3840 x 2160 pixels 4K Ultra HD IPS Black		£2.99 delivery 14-day returns		£241.55	£247.54	Visit site
Albans Services By Google	Philips 27 278E1A00 monitor 278E1A00-m001		£11.94 delivery		£247.20	£259.14	Visit site
OnBuy.com By Productshere	Philips E-line 278E1A - LED monitor - 27" - 3840 x 2160 4K - IPS - 300 cd/m² - 1000:1 - 4 ms - 2x4W8W DisplayPort - spe		Free delivery		£269.19	£269.19	Visit site

Note the 'Compare Prices' button....

Which then brings up this further price comparison feature: