



The Consumer Voice in Europe

Google Antitrust

Letter sent to Mr. Joaquín Almunia, Vice-President of the European Commission

Contact:

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Mr. Joaquín Almunia
Vice-President
European Commission
1049 BRUXELLES

Ref.: L2012_130/MGO/KRO/as

Brussels, 19 March 2012

Re: Google Antitrust

Dear Vice-President,

I am writing on behalf of the European Consumer Organisation (BEUC) to express our views on the ongoing investigation into the potential abuse by Google of its dominant market position in online search.

Consumers use search engines on a daily basis to source the information most relevant to them and to access content of their choice. The fact that search engines select and rank results according to perceived relevance is, in general, of tremendous benefit to consumers. Consumers trust that search results are impartial and based solely on relevance to their query, without any manipulation of the order or results.

However, we are concerned that the dominant search engine, Google, may have abused its position in the search market to direct users to its own services and secondly to reduce the visibility of competing websites and services. Google continues to expand its areas of activities and develop its own services and products. Given its role as gatekeeper to the internet, Google is in a unique position to restrict access to its competitors and direct traffic to its own services.

Google offers specialised vertical search services in particular segments, such as books, videos, maps and information. According to the comments¹ submitted to the United States' Federal Communications Commission by Foundem, a UK-based price comparison website, through the Universal search, Google regularly places its own services at or near the top of Google's search results and diverts traffic from its competitors to its own services. Such claims are confirmed by the findings of the SearchMetrics study², according to which the sites gaining most traffic are owned by Google; this is the case for videos (YouTube), maps (GoogleMaps), shopping (Google), images (Blogger), all of which are owned by Google.

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¹http://www.foundem.co.uk/FCC_Comments.pdf.

² <http://searchenginewatch.com/article/2099640/Universal-Search-Which-Formats-Dominate-in-Googles-Results-Study>

We are seriously concerned that if these allegations are substantiated by the Commission's analysis and investigation, consumers have suffered harm from Google's dominance by being provided with partial results of their search queries and thus being deprived of the possibility to make informed choices. Although we understand that Google has developed its own algorithms for pages ranking that are its own Intellectual Property and cannot be publicly disclosed, it is crucial that consumers are provided with results that are most relevant to their needs without any discrimination or manipulation on the grounds of Google's own commercial interests.

We expect the European Commission to take a strong stance and protect the principle of search neutrality according to which search results should be impartial and based solely on their relevance to consumers' queries. It is important that the European Commission exercises its powers to sanction dominant companies who abuse their position to the detriment of consumer welfare.

We remain at your disposal to further discuss our concerns.

Yours sincerely,

Monique Goyens
Director General

Cc: Mrs Eliana GARCÉS TOLÓN, member of the Cabinet of Vice-President Almunia