

DMA stakeholder workshop

How to apply the DMA's ban on self-preferencing in practice

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Status Quo for desktop lodging searches – self-preferencing

SEM ads – selected using auction bids and predicted click through rate

Given that the user has not provided travel dates, preferred star ranking, location, amenities etc., the results in this box have no relevance to the query as these hotels may not at all be what the user wants and/or be available

SEO – relevance-based algorithmic selection

The screenshot shows a Google search for "hotels in Chicago". The results are organized into several sections:

- SEM Ads (Red box):** Includes an ad for Hotels in Chicago - Booking.com, Top Reviewed Hotels, Hotels at Great Prices, Book Now, Book for Tonight, and a DownTown Chicago Hotel - Best Hotel in Downtown Chicago.
- Carousel (Blue box):** A horizontal carousel of hotel images with a "Find results on" button above it.
- Map (Pink box):** A map of Chicago with hotel locations marked, accompanied by a list of hotels with their ratings and prices.
- SEO-based results (Blue box):** Includes a section for "Top Hotels in Chicago, IL - Cancel FREE on most hotels" and a "THE 10 BEST Hotels in Chicago, IL for 2022 (from \$74)" list.

Carousel – insignificant

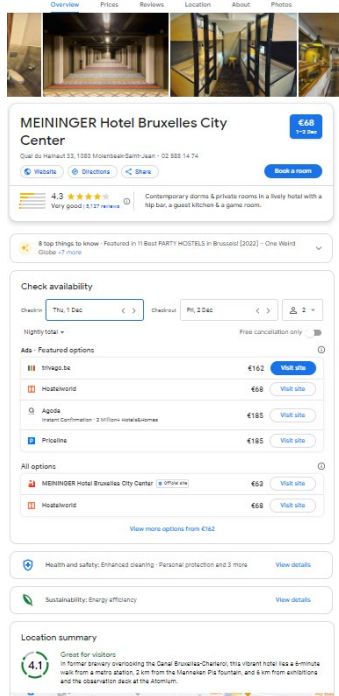
A very big and self-preferenced "blue link" to Google's travel vertical, a "bait and switch"

Status Quo – Click through from the One Box to Google's vertical

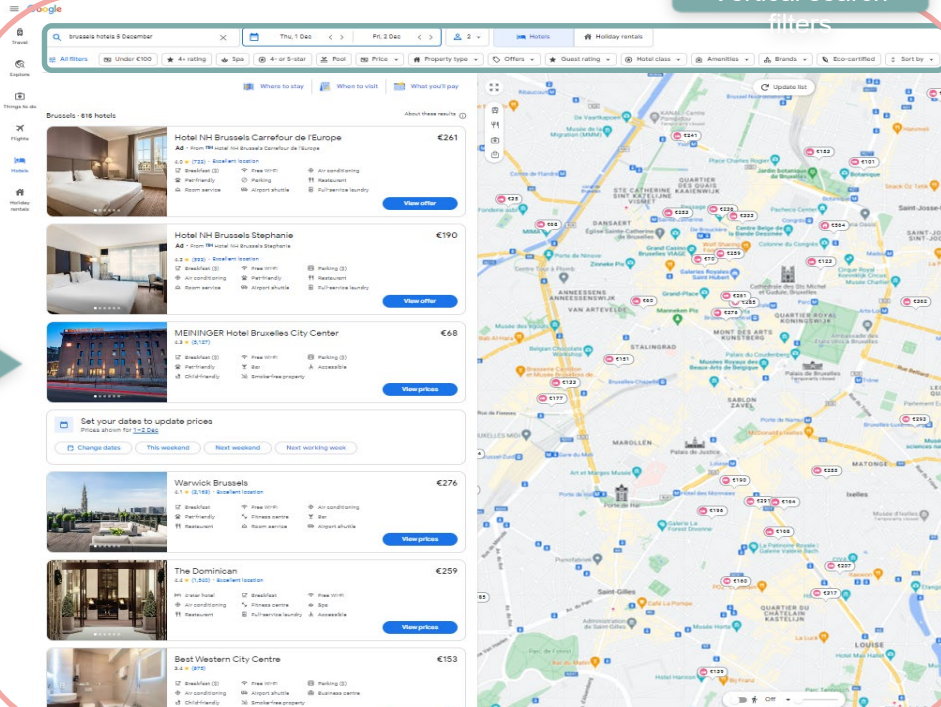
- click through on hotel image to

click through on map to

Vertical search



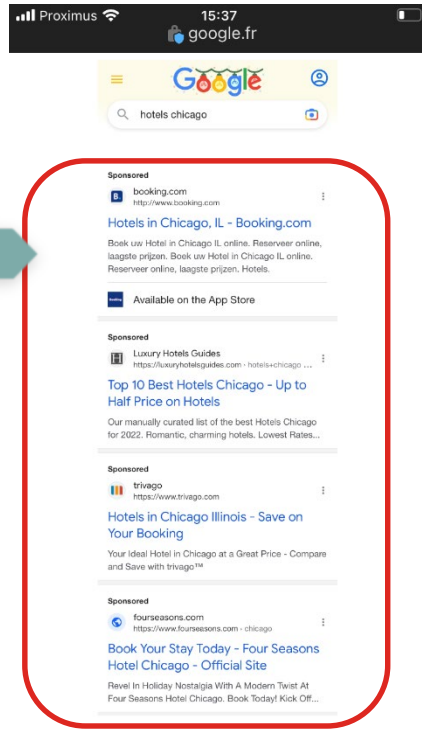
Google's vertical



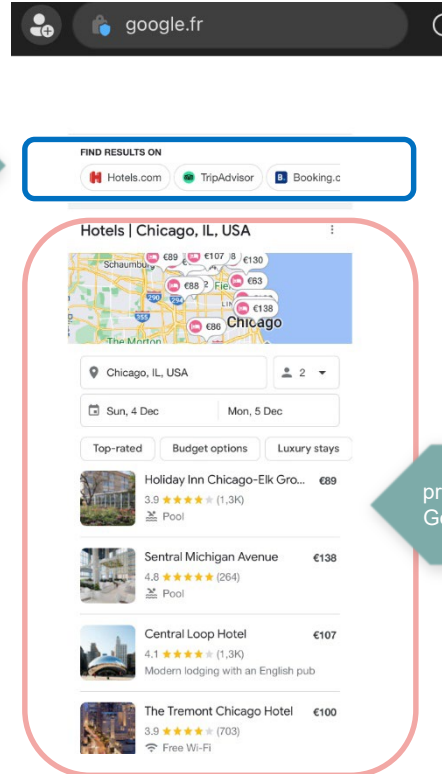
HPA ads

Status Quo for mobile lodging searches – self-preferencing

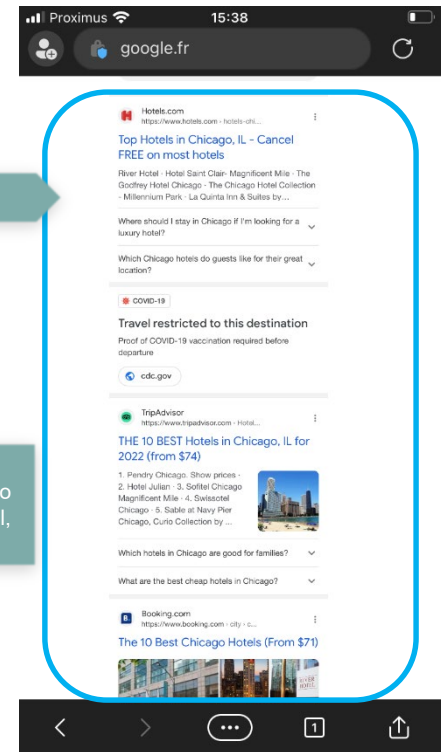
First part



Second part



Third part



A very big and self-preferenced blue link to Google's travel vertical, a "bait and switch"

Guiding Principles for Compliance

- There must be no differentiation or preferential treatment of Google's verticals (compared to competitor services) in relation to display, linking or other forms of relative prominence on the SERP
- There must be equal treatment in relation to
 - Prominence, which includes both location and proportion of screen allocated, formats and ranking/linking/rating criteria
 - Richness/attractiveness, including design and feature – if Google's vertical has a map, images, star ratings, reviews etc, competitor services have access to the same
 - Linking and other functionality available within a SERP must be equally available to Google and competitor services
- Mobile is now at least as important as desk top, so principles must work on mobile searches
- Any solution to address self-preferencing needs to be applied on the SERP (what happens inside of Google's own vertical search page is not relevant for this compliance requirement)

Compliance will not mean a return to plain blue links



hotels paris

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About 921,000,000 results (2,53 seconds)

Ad · <https://www.trivago.com/>

Paris Hotels - trivago™ Price Comparison - Find Great Offers

Hotels in Paris - Search, Compare and Save with trivago™! The Ideal Stay at a Great Price. Travel Smart, Use trivago. Save Time & Money. Compare & Save. Fast & Simple. Destinations: Istanbul, Mombasa, New York City, Antalya, Dubai, Amsterdam.

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SEM

SEM

<https://www.tripadvisor.com> > ... > Illinois (IL) > Chicago

THE 10 BEST Hotels in Chicago, IL for 2022 (from \$74)

1. Pendry Chicago, Show prices · 2. Hotel Julian · 3. Sofitel Chicago Magnificent Mile · 4. Swissotel Chicago · 5. Sable at Navy Pier Chicago, Curio Collection by ...

Which hotels in Chicago are good for families?

What are the best cheap hotels in Chicago?



<https://www.expedia.com> > ... > Illinois

Top Hotels in Chicago, CA from \$81 - Expedia

River Hotel · Congress Plaza Hotel · Embassy Suites Chicago Downtown Magnificent Mile · **Hotel Chicago** Downtown, Autograph Collection by Marriott · Hyatt Regency ...

What's the best place to stay in Downtown Chicago?

Where is the best place to stay in Chicago?



SEO

SEO

Sponsored · See hotel barcelona

Barcelona, Spain · 30 Nov – 1 Dec



Hotel Catalonia

Passeig de...

€148

Booking.com

4,6 ★ (456)



Serras Hotel

Barcelona

€317

mr.andmrs.smith.c...

4,6 ★ (695)



Apari

Barce

€81

Booki

4,6 ★

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google.fr

Hotels.com

<https://www.hotels.com> · hotels - CHI...

Top Hotels in Chicago, IL - Cancel FREE on most hotels

River Hotel · Hotel Saint Clair · Magnificent Mile · The Godfrey Hotel Chicago · The Chicago Hotel Collection · Millennium Park · La Quinta Inn & Suites by...

Where should I stay in Chicago if I'm looking for a luxury hotel?

Which Chicago hotels do guests like for their great location?

COVID-19

Travel restricted to this destination

Proof of COVID-19 vaccination required before departure

[cdc.gov](https://www.cdc.gov)

TripAdvisor

<https://www.tripadvisor.com> · Hotel...

THE 10 BEST Hotels in Chicago, IL for 2022 (from \$74)

1. Pendry Chicago, Show prices · 2. Hotel Julian · 3. Sofitel Chicago Magnificent Mile · 4. Swissotel Chicago · 5. Sable at Navy Pier Chicago, Curio Collection by ...



Which hotels in Chicago are good for families?

What are the best cheap hotels in Chicago?

Concrete solutions for the lodging vertical

- One Box in its current form is not compliant with the DMA.
- It is not for competitor services to design the specific look and feel of the SERP for Google but principles:
 - SEO results can be enhanced with rich text (and including photos etc), where all vertical search services (including Google's) are run through the same algorithm and displayed without differentiation in relation to the richness and functionality of the content
 - Similarly for paid/SEM content, Google must participate in the same payment mechanism, on the same terms as competitor services. In addition, the FRAND obligation in Article 6(12) means that any payment mechanism must not extract a disproportionate amount of the revenue generated by competitor services, and that Google's branded vertical could only occupy one slot
 - SEO or paid/SEM slots allocated to Google cannot use data that is not publicly available, generated or provided by competitor services (art 6.2) i.e. Google cannot fill the link-off on the SERP to its vertical with content provided by competitor services
- Any new unit devoted to vertical search products that are relevant to the general search query cannot be reserved for Google's vertical. If used, it must
 - Use the same mechanism to identify verticals displayed (with each brand displayed once) for all services (Google and competitor services), and display in the same manner (e.g. rich text, appropriate images)
 - Allocate paid slots to Google and competitor services using the same payment mechanism (with no brand displayed more than once, and displayed in the same manner)
- Users clicking on any vertical displayed (whether free or paid), should be routed directly to the vertical site