

## **Whether Google can influence how other firms conduct themselves in relation to general search and search advertising.**

- In our market of publishing games news, reviews, codes and guides it is a highly competitive market. We invest significant time and thus money in optimising our content and technical aspects of our business to produce content optimised for Google, as the dominant search engine.
- One technical example of working according to Google's requirements was Core Web Vitals. Google made a big deal of having 'Good' measurements. We invested significant time in optimising our websites, indeed setting measurable goals with weekly reports to management on progress. We have at least 173 tasks completed relating to this work, excluding the subtasks. We researched positioning in Google Search of ourselves relative to competitors which indicated it had very little or no influence on the overall ranking for similar content. The messaging from Google a few years later played down Core Web Vitals importance, yet when we hear such pronouncements on the importance of such metrics we obviously want to do well. In its Search Console it reports 'Poor' scores - if Google reports on these with negative connotations it's not something any reasonable business looking to succeed on Google Search would ignore. It took us many months of development work, and the associated management costs of that - seemingly for no return. We have other examples relating to schema, author information, advertising loading and display including Chrome blocking 'heavy ads', product release date information, and other technical and editorial requirements.

## **Requirements on Google to ensure fair terms (including payment terms) for use of publisher content.**

- Google extracts substantive elements of our content and displays it as a SERP feature, for example a Q+A drop-down. In recent times it has expanded the amount of content it takes and republishes in its AI Overviews. This keeps the reader on Google Search and denies publishers click through that might have followed from a high-ranking piece of content - this directly affects publishers' ability to monetise articles in order to pay the salaries of the people that work for them. There is a direct and measured reduction in traffic to our websites because of Google's practices in taking and republishing content in a substantive form.
- In addition, the space taken up by AI responses further impacts content creators by substantially reducing the potential to be seen by users via a page one ranking result.
- This is not simply a question of market innovation akin to Uber's arrival, and the subsequent competition it represented for traditional taxi companies - Google does not generate the content it uses for AI results, nor does it pay publishers for the content it takes. Given that Google has a near monopoly on search, In our view this represents unfair competition.

**How businesses are displayed and ranked in search results may therefore have significant consequences. To ensure any problems with businesses' search listings can be quickly and effectively addressed, we will consider interventions that require Google to have a clear, timely**

## **and effective process for receiving and responding to complaints from businesses**

- Following Core Updates to Google Search, in particular the 'Helpful Content Update' we expended considerable extra resources to assess, update, and change the way we published content on our websites. Two of our websites suffered such significant losses in traffic and demotion in search rankings that over the course of six months we had no choice but to make the roles of our journalists on those publications redundant. There is no suitable recourse for raising an issue with Google. We were not alone in the impact of fundamental changes to Google Search devastating our business.
- Following Google's guidelines, which are often vague, does not result in the meritocratic SERPs it promises. On many occasions we have seen favoured websites occupy several top stories boxes for long periods of time even though our sites have published a more recent article. We also regularly see sites which have substantial authority in other areas easily outrank our incumbent guides even though the core subject matter is not their focus - for example, NME and The Radiotimes are ranked highly for Roblox code guides.