

Alfonso Lamadrid



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M-Lex reports that Google's lawyers have not had a free day since...

Relevant markets / Dominance

Online v Offline advertising? Online (search, display, contextual) advertising? Search (search result links; sponsored links?) Non-search (banners; rich media?) Are market shares meaningful to identify market power? Geog. Markets?

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Essential facilities? What type of access? Neutrality feasible?

Practical arrangement.

Discrimination as a theory of harm

As a matter of practice.

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Some of Google's Antitrust Fronts

- **July 2003:** the **German Supreme Court** issues the '*Paperboy Decision*' and concludes against any finding of unfair competition taking into account that these services offered considerable added value in terms of providing information.
- **May 2007 - December 2007:** the **FTC** reviews and approves the acquisition of **DoubleClick**.
- **April 2007:** **U.S. District Court** reviews and dismisses an action brought by **kinderstart.com** for alleged downward manipulation of the Pagerank.
- **November 2008:** the **U.S. Department of Justice** challenges the proposed alliance with **Yahoo!**
- **August 2009:** **Italian NCA (AGCM)** opens an investigation into alleged abuse of dominant position in the Italian search engine market.

Some of Google's Antitrust Fronts

- **September 2009:** U.S. Ninth Circuit Court rejected Person's appeal of the Judgment of 2007 '*Person v. Google*' for alleged abusive **Adwords** practices.
- **January 2010:** the **German Cartel Office** opens an investigation into alleged 'fair share' revenues between Google and newspapers publishers.
- **May 2010:** the **FTC** reviews and approves the acquisition of **Admob**.
- **September 2010:** the **U.S. Attorney General of Texas** opens an investigation into whether Google uses its dominant position to harm rivals by manipulating its search results and paid search advertisements. Followed by Attorneys General of New York, California, Ohio, Mississippi and Oklahoma.

Some of Google's Antitrust Fronts

- **February 2010 - October 2010: French NCA** investigates the termination of **Navx's** Adword contract and imposes transparency requirements on Google.
- **November 2010:** the **EC** opens an investigation into alleged abuse of dominant position in online search and search advertising with numerous complainants.
- **December 2010: Japan's Fair Trade Commission** reviews and approves the alliance **Google / Yahoo!** and promises to monitor it closely.
- **December 2010: French NCA** issues a sector inquiry that considers that Google holds a dominant position on the advertising market linked to search engines.
- **March 2011 - September 2011: U.S. Senate** hearings announce antitrust scrutiny

Some of Google's Antitrust Fronts

- **March 2011: N.Y. District Court** rejects the proposed settlement in the Google Books case.
- **April 2011: the South Korean Fair Trade Commission** opens antitrust investigation into alleged obstruction of search / portal sites on Android smartphones.
- **April 2011: U.S. Department of Justice** reviews and conditionally approves the acquisition of **ITA Software**.
- **June 2011: a commercial court in Paris** investigates the claim brought by **1PlusV** for allegedly abusively restricting its vertical engines by 'black listing'.
- **June 2011: U.S. Department of Justice** reviews and approves the acquisition of **Admeld**.

Some of Google's Antitrust Fronts

- **April 2012: Argentina's Competition Commission** opens an investigation into search practices and search advertising business.
- **May 2012: India's Competition Commission** opens an investigation into alleged discriminatory practices relating to Adwords.
- **May 2012: Spanish NCA (CNC)** opens an investigation into alleged abuse of dominant position for refusal to set up an advertising contract
- **July 2012: Spanish NCA (CNC)** opens an investigation into alleged abusive termination of an advertising contract with a cannabis advertiser.

Some of Google's Antitrust Fronts

- **January 2013: FTC** and Google reach a settlement concerning licensing practices of key technologies and the management of campaigns by online advertisers. Among other, Google agrees to meet its commitments to allow access to competitors to patents on critical technologies needed for popular devices.



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The EC launched an investigation into Google in November 2010 after competitors, including Microsoft, accused the...

The European Commission's Investigation on Google

- Initiated on November 2010; Commitments **requested** from Google; Commitment package proposed on January 2013...
- Investigation spurred by approx. 20 complainants; 1plusV, AEDE, Bundesverband Deutscher Zeitungsverleger, Ciao!, eJustice.fr, Elfvoetbal, Expedia, Fairsearch.org, Foundem, Gelbe Seiten, Hot-map.com, Interactive Labs, Microsoft, Nextag, nnpt.it, Odigeo, Streetmap, Tripadvisor, Twenga, Verband Deutscher Zeitschriftenverleger , Bundesverband Deutscher Zeitungsverleger, Verband freier Telefonbuch und Auskunftsmedien.

The European Commission's Investigation on Google

- Theories of harm:
 - Alleged to lower rank of competing search engines on unpaid (organic) search results + preferential treatment of own vertical services;
 - Alleged to have lowered 'quality score' for sponsored links of competing vertical search engines;
 - Alleged to have entered into exclusive arrangements with advertising partners, thus preventing them from certain ads on their website;
 - Alleged restrictions on the use of online advertisement campaign data by competing advertising platforms;
 - Others (Karate Competition Law): scraping / snippets; access to Youtube; privacy...



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Suggestions:

- Due to lack of public information it is not possible to extract any clear lessons from the case.
- Perhaps you should have chosen another topic to talk about.
- Otherwise, why not focus on enforcement issues instead of legal principles? [Click here](#).
- Even if there are no lessons, you could address some open questions.

Enforcement Issues

- Confirmation of some known stuff:
Competition law as an element of business strategy; EU preferred battleground for high-tech US companies (change of attitude at US agencies, but confined to reasonable limits –*in dubio pro innovation*–)
- A new commitments-based enforcement paradigm;
- International inter-agency cooperation?



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Are There Merits to a Principle of Search Neutrality?

- Are search engines essential facilities / bottlenecks?
- Is access indispensable (essential); what type of access?
- Is neutrality a feasible and desirable aspiration?

Are there merits to a principle of search neutrality?

Essential facilities? What type of access? Neutrality feasible?

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Discrimination as a Theory of Harm

- At most, fact-specific theories of harm showing affirmative actions by dominant firm aimed at harming competitors;
- Has Google engaged in any such anticompetitive actions
 - Organic search results:
 - Sponsored links:
 - Universal Search

Are there merits to a principle of search neutrality?

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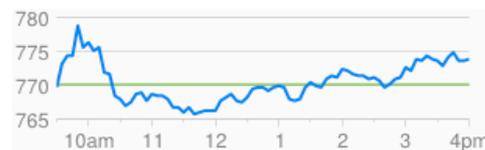
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773.95 +3.78 (0.49%)

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| | |
|---------|-----------|
| Open | 769.70 |
| High | 778.81 |
| Low | 765.50 |
| Volume | 2,840,106 |
| Avg Vol | 2,340,000 |
| Mkt Cap | 255.14B |

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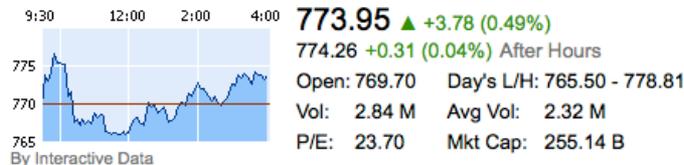
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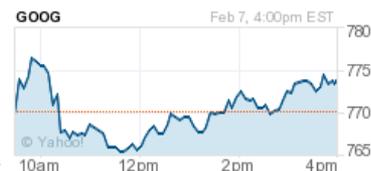
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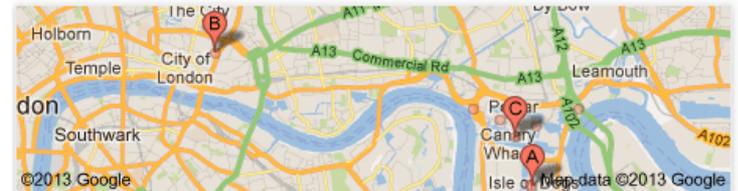
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B 6 Adam's Ct London 020 7628 0808

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