



## RESPONSE TO THIRD REQUEST FOR INFORMATION

2021MAY0010

(Competition Commission Inquiry Into Online Intermediation Platforms)

**10 December 2021 - Google Search, Shopping and Travel**

Below is Google's response to questions 14, 15, 16, 25, 26 and 28 (the **Tranche 5** submission) of the South African Competition Commission's information request dated 10 December 2021 in relation to Google Search, Shopping and Travel.

These responses are supplementary to the responses provided in relation to questions 1, 2, 3, 4, 5, 6, 13, 17, 18, 19, 20, 21, 22, 23, 24, 27, 33, 34, 35, 36.2, 37, 38, 39, 39.2.1, 40, 41, 42, 43, 44, 46, 47 and 48 (the **Tranche 1, 2 3 and 4** submissions).

Google has sought to provide the best information available by the response deadline. Responses to the remaining questions will follow as soon as possible.

Please note that this document and its annexes contain business secrets and otherwise sensitive information, and should therefore be considered strictly confidential. A CC7 Form and schedule will follow as soon as possible.

### List of Annexes

| Annex      | Title      |
|------------|------------|
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |

### BIDDING ON OWN OR COMPETITORS' TRADING NAMES

14. Provide data for South Africa on the extent to which (a) e-commerce sites and (b) travel and accommodation sites bid on text ads for their own trading name over the last 5 years (2017-2021).

14.1. There are a large number of e-commerce sites and travel and accommodation sites in South Africa that have Google Ads accounts. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] As such, providing data for all e-commerce sites and travel and accommodation sites would be an extremely time-consuming and significant task.

14.2. In order to assist the SACC as much as possible, Google has identified the top 30 Google Ads accounts by spend on text ads in South Africa (by user location) for 2021, separately for the advertisers classified under the "Retail" vertical and the "Travel" vertical. The list of advertiser accounts, ordered by their total spend on text ads in 2021, can be found in Annex 14.1; [REDACTED]  
[REDACTED]

14.3. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

14.4. The data show that:  
14.4.1. [REDACTED] out of the top 30 advertiser accounts for "Retail" [REDACTED] had at least one keyword with their own trading name over the period 2017-2021; and

<sup>1</sup> For completeness, Google notes that for some accounts, data are only available for a period shorter than 2017-2021.  
<sup>2</sup> See <https://support.google.com/google-ads/answer/2471185?hl=en>.

14.4.2. [REDACTED] out of the top 30 advertiser accounts for “Travel” [REDACTED] had at least one keyword with their own trading name over the period 2017-2021.

**15. Provide data for South Africa on the extent to which (a) e-commerce sites and (b) travel and accommodation sites bid on the text ads of their competitors over the last 5 years (2017-2021).**

15.1. [REDACTED]

15.2. The data show that:

15.2.1. [REDACTED] out of the top 30 advertiser accounts for “Retail” [REDACTED] had at least one keyword with the name of another advertiser in the sample of 30 advertiser accounts over the period 2017-2021; and

15.2.2. [REDACTED] out of the top 30 advertiser accounts for “Travel” [REDACTED] had at least one keyword with the name of another advertiser in the sample of 30 advertiser accounts over the period 2017-2021.

<sup>3</sup> For completeness, Google notes that for some accounts, data are only available for a period shorter than 2017-2021.

<sup>4</sup> See <https://support.google.com/google-ads/answer/2471185?hl=en>.

**16. Provide data on the average cost of winning the auction on text ads for one’s own trading name for (a) e-commerce sites and (b) travel sites over the last 5 years (2017-2021).**

16.1. [Redacted]

16.2. The data are presented in Annex 16.1 for each advertiser account separately.

[Redacted]

### GOOGLE SHOPPING UNIT TRENDS

**25. Provide data on the frequency with which the Google Shopping Unit is placed in different positions on the Google Search page in South Africa (e.g. top of page, top right-hand-side) over the last 5 years (2017-2021), in total and by mobile and desktop separately.**

25.1. Annex 25.1 shows the proportion of times the Google Shopping Unit is shown (i) at the top, (ii) below top on back button<sup>8</sup>, (iii) on the right-hand-side and (iv) at the bottom on the SERP page for queries where the Shopping Unit is triggered, in South Africa (by user location) on an annual basis between 2017 and 2021. This

<sup>5</sup> This excludes cases where the advertiser won the auction but there was no click on the text ad.

<sup>6</sup> For completeness, Google notes that for some accounts, data are only available for a period shorter than 2017-2021.

<sup>7</sup> See <https://support.google.com/google-ads/answer/2471185?hl=en>.

<sup>8</sup> These are Shopping ads which are returned in response to a user using the “back button” to return to the SERP page after clicking on a Shopping ad in the mobile interface.

is presented separately for desktop and mobile<sup>9</sup>, as well as desktop and mobile combined.

**26. Provide data on the average, median, maximum and minimum number of Google Shopping Unit impressions in South Africa over the last 5 years (2017-2021), in total and by mobile and desktop separately.**

26.1. Annex 26.1 presents the minimum, median, average, 95th percentile and maximum number of results shown in the Shopping Unit across all queries which trigger the Shopping Unit in South Africa (by user location) for the period 2017-2021.

[REDACTED]

[REDACTED]

**28. Send the Inquiry 5 years of annual data (2017-2021) on click volumes to merchants of different result positions within the Google Shopping Unit (e.g. 'above the fold', 'below the fold'<sup>10</sup>, first position, position 2-5, etc), altogether and by mobile and desktop separately.**

28.1. Annex 28.1 presents the number of clicks in South Africa (based on user location) for result positions 1, 2-5, 6-10, 11-20, and beyond 20 separately for the different positions of the Shopping Unit on the SERP page: (i) at the top, (ii) below top on back button<sup>11</sup>, (iii) on the right-hand-side, and (iv) at the bottom. The data are presented separately for desktop and mobile, as well as desktop and mobile combined.

28.2. [REDACTED]

<sup>9</sup> For the rest of this response, unless stated otherwise, mobile refers to mobile phones only.

<sup>10</sup> In this case, 'above the fold' refers to when customers do not scroll to the right whereas 'below the fold' refers to when they do scroll to the right.

<sup>11</sup> These are Shopping ads which are returned in response to a user using the "back button" to return to the SERP page after clicking on a Shopping ad in the mobile interface.



[REDACTED]