



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 7, 8, 9, 10, 11, 12, 29, 30, 31, 32, 36.1, 36.3 and 45 (the **Tranche 6** 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, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 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, 4 and 5** submissions).

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]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

TEXT ADS OVER TIME

7. Provide data on the average, median, maximum and minimum number of text ads (i) above the fold on the first page, (ii) above the first organic result on the first page, (iii) under the last organic result on the first page, (iv) on search page 2 and (v) on search pages 3-10, (vi) on search pages >11 for (a) e-commerce searches, and (b) travel and accommodation searches in South Africa per annum over the last 10 years (2012-2021), in total and by mobile and desktop separately.

7.1. [REDACTED]

7.2. [REDACTED]

- 7.3. **Annex 7.1** presents the 1st percentile, median, average, and 99th percentile number of text ads that are shown for (i) shopping commercial queries and (ii) travel and accommodation queries in South Africa (based on user location) for SERP pages 1, 2, 3-10 and beyond 10. The data are presented separately for text ads that are shown (i) above the first organic result on the SERP page, and (ii) under the last organic result on the SERP page, and on an annual basis for 2020 and 2021. The data is also provided on an overall basis as well as broken out by desktop and mobile.³

7.3.1. [REDACTED]

¹ [REDACTED]

² As set out in paragraph 21.4 of the first tranche of Google's response to the RFI dated , a navigational search query is one where the user types in the name of the domain itself into a search engine.

³ For the rest of this response, unless stated otherwise, mobile refers to mobile phones only.

[REDACTED]

7.3.2.

[REDACTED]

7.1 Also do the above for the top 5 e-commerce searches and top 5 travel and accommodation searches in South Africa.

7.4. Google has taken the following steps to identify the top 5 shopping commercial queries in South Africa (based on user location).

7.4.1.

[REDACTED]

7.4.2.

[REDACTED]

7.4.3.

[REDACTED]

7.5. Google has taken the following steps to identify the top 5 travel queries in South Africa (based on user location).

7.5.1.

[REDACTED]

⁴ [REDACTED]

⁵ For completeness, Google notes that a subset of queries is removed from Google's internal database because of user privacy policies. Hence, the query volumes are based only on queries which are not removed from Google's internal database.

[REDACTED]

7.5.2.

[REDACTED]

7.5.3.

[REDACTED]

7.6. **Annex 7.2** presents the 1st percentile, median, average, and 99th percentile number of text ads that are shown for (i) the top 5 shopping commercial queries and (ii) the top 5 travel and accommodation queries in South Africa (based on user location) for SERP pages 1, 2, 3-10 and beyond 10. The data are presented separately for text ads that are shown (i) above the first organic result on the SERP page, and (ii) under the last organic result on the SERP page, and on an annual basis for 2020 and 2021. The data is also provided on an overall basis as well as broken out by desktop and mobile.

7.6.1.

[REDACTED]

7.6.2.

[REDACTED]

8. **Send the Inquiry 10 years of annual data (2012-2021) on Google text ad traffic click volumes and average click-through rates going to (a) e-commerce sites and (b) travel and accommodation sites by consumers in South Africa, in total and by mobile and desktop separately.**

8.1.

[REDACTED]

[REDACTED]

8.2.

[REDACTED]

8.3. **Annex 8.1** presents the number of clicks and average CTR in South Africa (based on user location) for text ads on an annual basis between 2020 and 2021. This is presented separately for shopping commercial queries and travel queries. The data are also provided on an overall basis as well as broken out by desktop and mobile.

8.3.1.

[REDACTED]

8.3.2.

[REDACTED]

8.3.3. CTR is calculated as total clicks / total impressions⁷.

8.1 Also do the above for the top 5 e-commerce searches and top 5 travel and accommodation searches in South Africa.

8.4. Google has taken the following steps to identify the top 5 shopping commercial queries in South Africa (based on user location).

⁶ [REDACTED]

⁷ [REDACTED]

8.4.1. [Redacted]

8.4.2. [Redacted]

8.4.3. [Redacted]

8.5. Google has taken the following steps to identify the top 5 travel queries in South Africa (based on user location).

8.5.1. [Redacted]

8.5.2. [Redacted]

8.5.3. [Redacted]

8.6. [Redacted]

8 [Redacted]

9 [Redacted]

8.7. **Annex 8.2** presents the number of clicks and average CTR in South Africa (based on user location) for text ads on an annual basis between 2020 and 2021. This is presented separately for each of the top 5 shopping commercial queries and each of the top 5 travel queries. The data are also provided on an overall basis as well as broken out by desktop and mobile.

8.7.1. [REDACTED]

8.7.2. [REDACTED]

8.7.3. [REDACTED]

9. Provide data on the breakdown in click volumes on text ads (i) above the fold on the first page, (ii) above the first organic result on the first page, (iii) under the last organic result on the first page, (iv) on search page 2 and (v) on search pages 3-10, (vi) on search pages >11 for (a) e-commerce searches, and (b) travel and accommodation searches in South Africa per annum over the last 10 years (2012-2021), in total and by mobile and desktop separately.

9.1. [REDACTED]

9.2. [REDACTED]

9.3. **Annex 9.1** presents the number of clicks in South Africa (based on user location) on text ads on SERP pages 1, 2, 3-10 and beyond 10 on an annual basis between

¹⁰ [REDACTED]

¹¹ [REDACTED]

2020 and 2021. This is presented separately for shopping commercial queries and travel queries. The data are also provided on an overall basis as well as broken out by desktop and mobile.

9.3.1. [Redacted]

9.3.2. [Redacted]

9.3.3. [Redacted]

9.1 Also do the above for the top 5 e-commerce searches and top 5 travel and accommodation searches in South Africa.

9.4. Google has taken the following steps to identify the top 5 shopping commercial queries in South Africa (based on user location).

9.4.1. [Redacted]

9.4.2. [Redacted]

12 [Redacted]

13 [Redacted]

[Redacted]

9.4.3. [Redacted]

9.5. Google has taken the following steps to identify the top 5 travel queries in South Africa (based on user location).

9.5.1. [Redacted]

9.5.2. [Redacted]

9.5.3. [Redacted]

9.6. **Annex 9.2** presents the number of clicks in South Africa (based on user location) on text ads on SERP pages 1, 2, 3-10 and beyond 10 on an annual basis between 2020 and 2021. This is presented separately for the top 5 shopping commercial queries and the top 5 travel queries. The data are also provided on an overall basis as well as broken out by desktop and mobile.

9.6.1. [Redacted]

9.6.2. [Redacted]

9.6.3. [Redacted]

10. Provide annual data on the average, median, minimum, and maximum cost per click and spend on Google text ads going to (a) e-commerce sites and (b) travel and accommodation sites over the last 10 years (2012-2021), in total and by mobile and desktop separately.

10.1. [REDACTED]

[REDACTED] Nonetheless, in order to assist the SACC as much as possible, Google has relied on data from a third-party source, SimilarWeb, to identify “e-commerce” and “travel and accommodation” sites. Specifically, SimilarWeb classifies domains with desktop and mobile traffic in South Africa for the period of September 2021 – November 2021 into categories which appear to correspond to the SACC’s categories of “e-commerce” and “travel and accommodation”:

10.1.1. the domains listed in the SimilarWeb category “E-commerce and Shopping” corresponds to “e-commerce” sites, and

10.1.2. the domains listed in the SimilarWeb categories “Accommodation and Hotels”, “Air Travel”, and “Travel and Tourism” correspond to “travel and accommodation” sites¹⁴.

10.2. [REDACTED]

10.3. [REDACTED]

¹⁴ These are the same SimilarWeb categories as those provided in paragraph 15.8 of Tranche 1 of Google’s Response to the SACC’s RFI dated 13 August 2021.

¹⁵ Annex 4.1 was submitted to the Commission on 18 February 2022 as part of the Tranche 4 submission.

¹⁶ The domains in the list from SimilarWeb in Annex 4.1 are matched exactly with Google’s internal databases.

- 10.4. Spend data are retrieved from Google’s data sources in USD¹⁷ and converted to ZAR by reference to SARB average exchange rates in each year¹⁸. Cost-per-click is calculated as (total spend on text ads / total number of clicks on text ads).
- 10.5. **Annex 10.1** presents the minimum, median, average and maximum spend on text ads as well as the minimum¹⁹ average,²⁰ and maximum²¹ CPC for text ads in South Africa (based on user location) for the period February 2021 to January 2022. This is provided separately for “e-commerce” domains and “travel” domains. The data are also provided on an overall basis as well as broken out by desktop and mobile.
- 10.1 **Also do the above for the top 5 e-commerce searches and top 5 travel and accommodation searches in South Africa.**
- 10.6. Google has taken the following steps to identify the top 5 shopping commercial queries in South Africa (based on user location).

10.6.1. [REDACTED]

10.6.2. [REDACTED]

¹⁷ Google has compiled this response for the limited purpose of responding to this request, and in doing so has used systems that may not be used for financial reporting and that may not be published externally. Therefore, revenue data included in the responses are not US GAAP and may differ from publicly reported revenue.

¹⁸ Exchange rate is obtained from <https://www.resbank.co.za/en/home/what-we-do/statistics/key-statistics/selected-historical-rates>.

¹⁹ [REDACTED]

²⁰ [REDACTED]

²¹ [REDACTED]

²² The pre-filter seeks to identify whether a query is a possible candidate for showing a Shopping Unit, and for which a Shopping ad auction should be run, even if the Shopping Unit does not ultimately show.

[REDACTED]

10.6.3.

[REDACTED]

10.7. Google has taken the following steps to identify the top 5 travel queries in South Africa (based on user location).

10.7.1.

[REDACTED]

10.7.2.

[REDACTED]

10.7.3.

[REDACTED]

10.8.

[REDACTED]

10.9.

[REDACTED]

10.10.

[REDACTED]

²³ [REDACTED]

²⁴ The domains in the list from SimilarWeb in Annex 4.1 are matched exactly with Google's internal databases.

²⁵ The domains in the list from SimilarWeb in Annex 4.1 are matched exactly with Google's internal databases.

[REDACTED]

10.11. Spend data are retrieved from Google’s data sources in USD²⁶ and converted to ZAR by reference to SARB average exchange rates in each year²⁷. Cost-per-click is calculated as (total spend on text ads / total number of clicks on text ads).

10.12. **Annex 10.1** presents the minimum, median, average and maximum spend on text ads as well as the minimum²⁸ average,²⁹ and maximum³⁰ CPC for text ads in South Africa (based on user location) for the period February 2021 to January 2022. This is provided separately for “e-commerce” domains which feature in the top 5 shopping commercial queries and “travel” domains which feature in the top 5 travel queries. The data are also provided on an overall basis as well as broken out by desktop and mobile.

11. Send the Inquiry density plots of spending by (a) e-commerce sites and (b) travel and accommodation sites in South Africa on Text Ads per annum over the last 5 years (2017- 2021). Explain your calculations.

11.1. [REDACTED]

[REDACTED] Nonetheless, in order to assist the SACC as much as possible, Google has relied on data from a third-party source, SimilarWeb, to identify “e-commerce” and “travel and accommodation” sites. Specifically, SimilarWeb classifies domains with desktop and mobile traffic in South Africa for the period of September 2021 – November 2021 into categories which appear to correspond to the SACC’s categories of “e-commerce” and “travel and accommodation”:

²⁶ Google has compiled this response for the limited purpose of responding to this request, and in doing so has used systems that may not be used for financial reporting and that may not be published externally. Therefore, revenue data included in the responses are not US GAAP and may differ from publicly reported revenue.

²⁷ Exchange rate is obtained from <https://www.resbank.co.za/en/home/what-we-do/statistics/key-statistics/selected-historical-rates>.

²⁸ [REDACTED]

²⁹ [REDACTED]

³⁰ [REDACTED]

- 11.1.1. the domains listed in the SimilarWeb category “E-commerce and Shopping” corresponds to “e-commerce” sites, and
- 11.1.2. the domains listed in the SimilarWeb categories “Accommodation and Hotels”, “Air Travel”, and “Travel and Tourism” correspond to “travel and accommodation” sites³¹.

11.2. [REDACTED]

11.3. [REDACTED]

11.4. Spend data are retrieved from Google’s data sources in USD³³ and converted to ZAR by reference to SARB average exchange rates in each year³⁴.

11.5. **Figures 1 and 2** below present total spend on text ads in South Africa (by user location) per every 10th percentile of (i) e-commerce sites and (ii) travel sites respectively, for the period February 2021 – January 2022. These are calculated as follows:

11.5.1. [REDACTED]

11.5.2. [REDACTED]

11.5.3. [REDACTED]

³¹ These are the same SimilarWeb categories as those provided in paragraph 15.8 of Tranche 1 of Google’s Response to the SACC’s RFI dated 13 August 2021.

³² The domains in the list from SimilarWeb in Annex 4.1 are matched exactly with Google’s internal databases.

³³ [REDACTED]

³⁴ Exchange rate is obtained from <https://www.resbank.co.za/en/home/what-we-do/statistics/key-statistics/selected-historical-rates>.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12. For (a) e-commerce sites and (b) travel and accommodation sites in South Africa, send the Inquiry information on the total clicks per spending decile³⁵ on Google Text Ads per annum over the last 5 years (2017-2021). Explain your calculations.

12.1. [REDACTED]

[REDACTED] Nonetheless, in order to assist the SACC as much as possible, Google has relied on data from a third-party source, SimilarWeb, to identify “e-commerce” and “travel and accommodation” sites. Specifically, SimilarWeb classifies domains with desktop and mobile traffic in South Africa for the period of September 2021 – November 2021 into categories which appear to correspond to the SACC’s categories of “e-commerce” and “travel and accommodation”:

12.1.1. the domains listed in the SimilarWeb category “E-commerce and Shopping” corresponds to “e-commerce” sites, and

12.1.2. the domains listed in the SimilarWeb categories “Accommodation and Hotels”, “Air Travel”, and “Travel and Tourism” correspond to “travel and accommodation” sites³⁶.

12.2. [REDACTED]

12.3. [REDACTED]

12.4. [REDACTED]

³⁵ The spending decile can be arranged as a result of spend from the lowest cost-per-click values to the highest cost-per-click values in the highest spend decile.

³⁶ These are the same SimilarWeb categories as those provided in paragraph 15.8 of Tranche 1 of Google’s Response to the SACC’s RFI dated 13 August 2021.

³⁷ The domains in the list from SimilarWeb in Annex 4.1 are matched exactly with Google’s internal databases.

12.4.1. [Redacted]
[Redacted]
[Redacted]

12.4.2. [Redacted]
[Redacted]

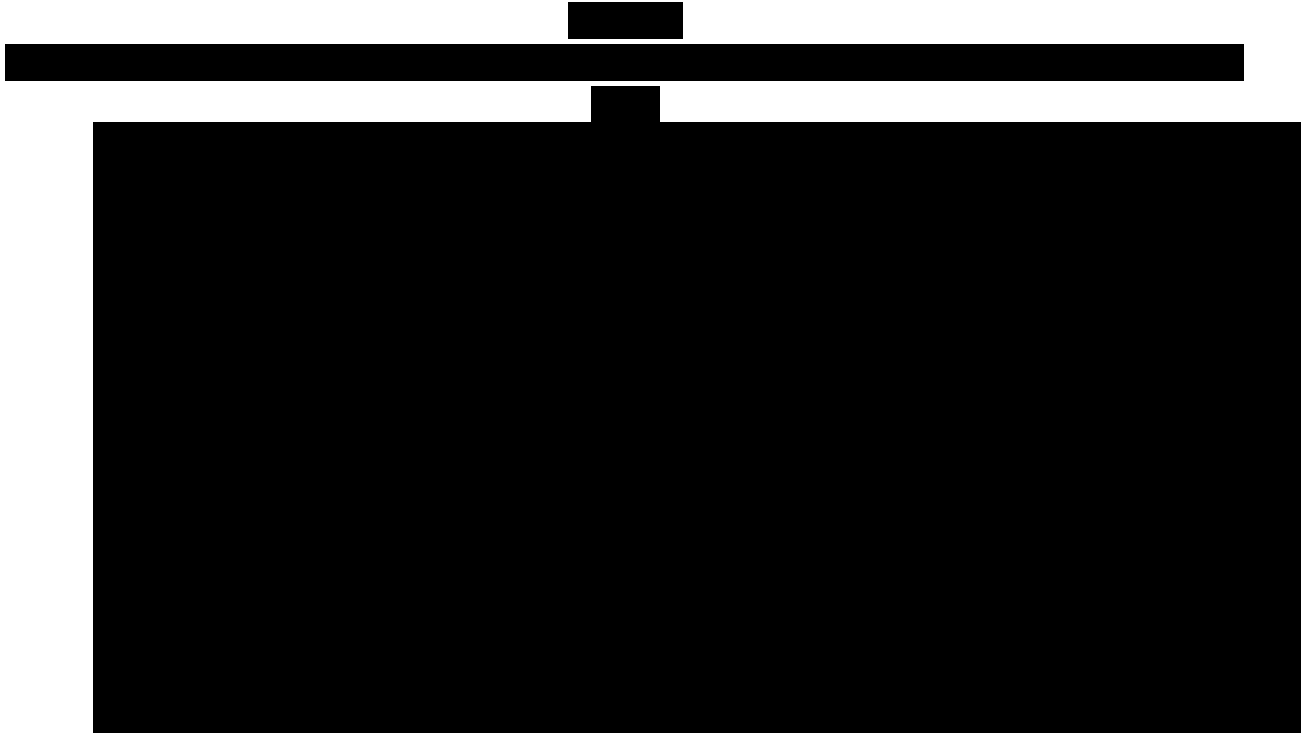
12.4.3. [Redacted]
[Redacted]
[Redacted]
[Redacted]

[Redacted]
[Redacted]

[Redacted]

[Redacted]

³⁸ CPC for each domain is calculated as total spend on text ads / total clicks on text ads.



GOOGLE SHOPPING UNIT TRENDS

29. Send the Inquiry 5 years of annual data (2017-2021) on the average, median, maximum and minimum cost per click (ZAR) per spending decile for the Google Shopping Unit in total, and by mobile and desktop separately.

29.1. Annex 29.1 presents for 2017-2021, the minimum,³⁹ average,⁴⁰ 90th percentile, and maximum⁴¹ cost-per-click (“CPC”) for the Shopping Unit in South Africa (based on user location) by spending decile of merchants on Shopping Ads in the Shopping Unit.

29.2. [Redacted]

³⁹ [Redacted]

⁴⁰ [Redacted]

⁴¹ [Redacted]

29.3. [REDACTED]

29.3.1. [REDACTED]

29.3.2. [REDACTED]

29.4. [REDACTED]

29.5. Data are provided for mobile and desktop separately.

30. Send the Inquiry 5 years of annual data (2017-2021) on the average, median, maximum and minimum click-through rates per spending decile for the Google Shopping Unit, in total and by mobile and desktop separately.

30.1. **Annex 30.1** presents for 2017-2021, the minimum,⁴⁴ average,⁴⁵ 90th percentile, and maximum⁴⁶ click-through rate⁴⁷ (“CTR”) for the Shopping Unit in South Africa (based on user location) by spending decile of merchants on Shopping Ads in the Shopping Unit.

30.2. [REDACTED]

⁴² [REDACTED]

⁴³ Exchange rate is obtained from <https://www.resbank.co.za/en/home/what-we-do/statistics/key-statistics/selected-historical-rates>.

⁴⁴ [REDACTED]

⁴⁵ [REDACTED]

⁴⁶ [REDACTED]

⁴⁷ As click data are based on click counts, it is possible for CTR to be more than 100%. For example, if there are ten impressions, and each impression has three clicks, the CTR would be 300%.

[REDACTED]

30.3. [REDACTED]

30.3.1. [REDACTED]

30.3.2. [REDACTED]

30.4. Data are provided for mobile and desktop separately.

GOOGLE SHOPPING PROPERTY

31. Since the introduction of the Google Shopping Property in South Africa, provide annual data in total and by mobile and desktop separately on:

31.1. The number of ads per page and the number of organic results per page for the first page and pages 2-5.

31.1.1. **Annex 31.1** presents the average number of paid and free product listings for the (i) first page and (ii) the second page and beyond on the Shopping Property in South Africa (based on user location). Data are provided on an annual basis for the period 2017-2021. As free product listings were introduced in the Shopping Property in 2020, the average number of free product listings is zero for the years 2017 to 2019. The data are provided separately for desktop and mobile.

31.2. The number of ads and organic results above the fold on the first page.

31.2.1. [REDACTED]

Google also notes that results that are shown “above the fold” would vary from user to user depending on several factors including (i) screen size, (ii) resolution, (iii) font size and (iv) zoom on page.

32. Since the introduction of the Google Shopping Property in South Africa, provide annual data on the number of clicks onto the Google Shopping Property tab, in

total and by mobile and desktop separately. Of these, provide data in total and by mobile and desktop separately on:

32.1. **Annex 32.1**, sheet “**Q32**” presents the number of clicks from the SERP page to the Shopping Property. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] Annual data are provided for the period 2017-2021.

32.1. How many of these clicks per annum were from the “View all” button in the Shopping Unit on the Google Search page.

32.2. **Annex 32.1**, sheet “**Q32.1**” presents the number of clicks from the SERP page to the Shopping Property that were from the “View all” option in the Shopping Unit. Annual data are provided for the period 2017-2021.

32.2. How many times Google Shopping Property results were clicked on per annum, and of these, how many were clicks on ads and how many were clicks on organic results.

32.3. **Annex 32.1**, sheet “**Q32.2**” presents for each year between 2017 and 2021:

32.3.1. The number of clicks in the Shopping Property. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

32.3.2. The number of paid clicks to merchants in the Shopping Property.

32.3.3. The number of free clicks to merchants in the Shopping Property.

32.3. The click through rates on the Google Shopping Property altogether and for ads and organic results separately

32.4. **Annex 32.1**, sheet “**Q32.3**” presents for each year between 2017 and 2021:

- 32.4.1. The click-through rate (“CTR”) of merchant results in the Shopping Property. This is calculated as (total number of paid and unpaid clicks to merchants) / (total number of paid and unpaid impressions).
- 32.4.2. The CTR of paid merchant results in the Shopping Property. This is calculated as (total number of paid clicks to merchants) / (total number of paid impressions).
- 32.4.3. The CTR of unpaid merchant results in the Shopping Property. This is calculated as (total number of free clicks to merchants) / (total number of free impressions).

32.4. The number of times that clicks were on (i) page 1 and (ii) pages 2-5.

32.5. **Annex 32.1**, sheet “**Q32.4**” provides the number of clicks to merchants on (i) page 1 and (ii) page 2 and beyond of the Shopping Property. The data are provided for the period 2017-2021.

32.5. The number of times that clicks were above-the-fold on the first page.

32.6. [REDACTED]

32.6. The number of times that products were filtered further.

32.7. **Annex 32.1**, sheet “**Q32.6**” provides the number of queries where products were filtered further. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

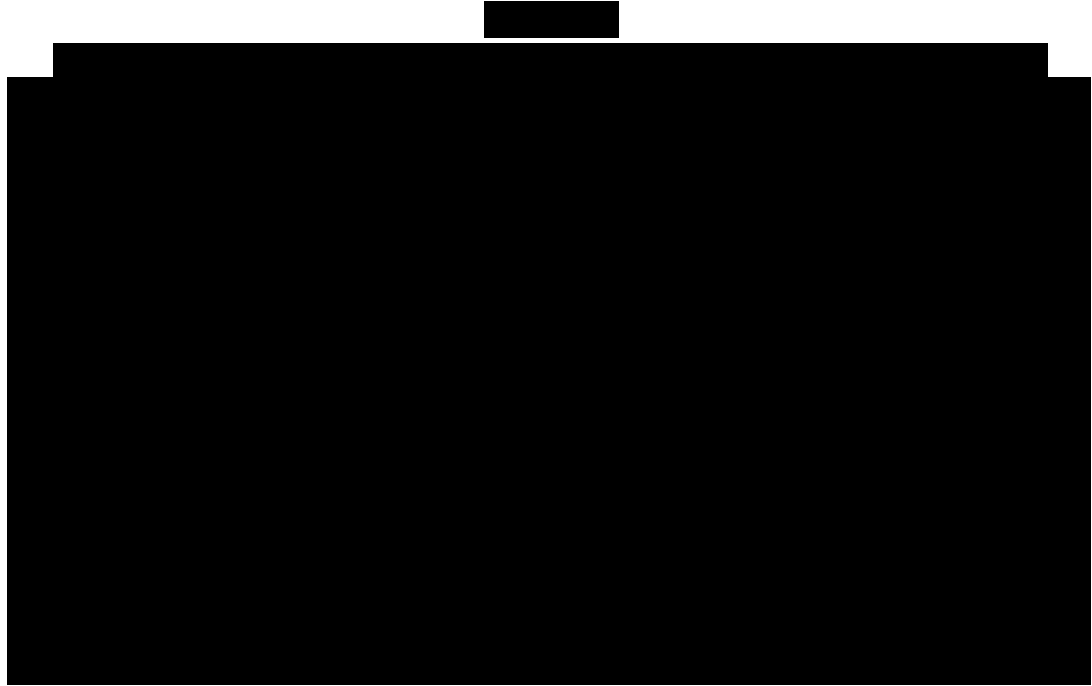
[REDACTED] The data are provided for the period 2017-2021.

DATA UPDATES

36. Please update the following data tables so that there is a full calendar year for 2021:

36.1. Google’s submission on 17 July 2021: Table 6.4C

- 36.1. **Table 36.1** below shows the monthly number of clicks to merchants' websites originating from the Shopping Property in South Africa for the period June - December 2021. This is an update of Table 6.4C of Google's submission on 17 July 2021, which covered the period up to and including May 2021.

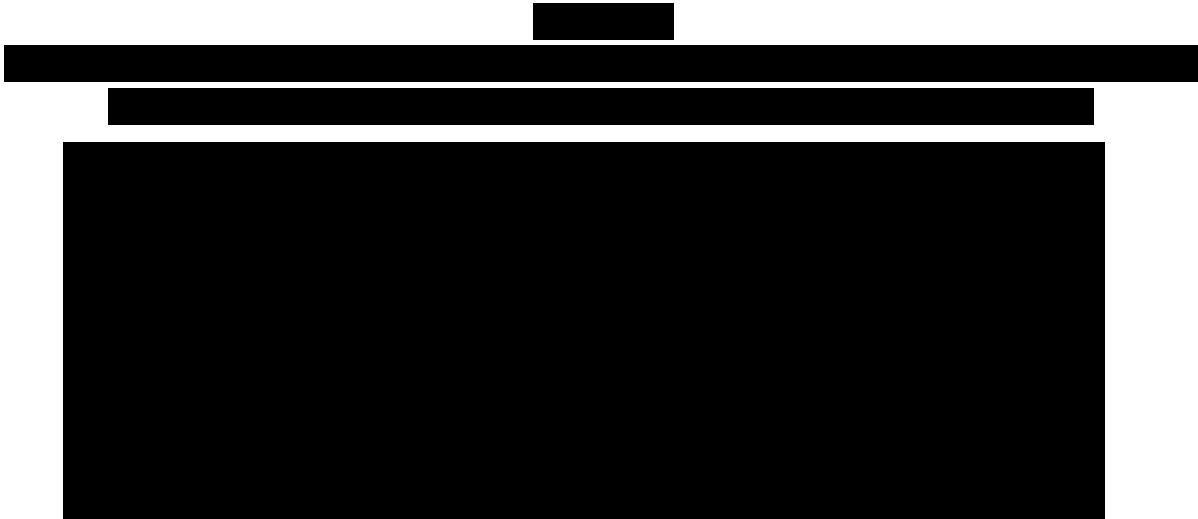
A large black rectangular redaction box covers the content of Table 36.1. A smaller black rectangular redaction box is positioned above the main redaction, centered horizontally.

36.3. Tranche 3 of Google's submission (1 October 2021): Table 2.1; "Density plot of total spend on Google Shopping – Jan-Aug 2021"; Annex 5.1; Annex 6.1; Table 9.1, Table 10.1, Figure 6

- 36.2. **Table 36.3** below shows full year 2021 figures for the data that was previously presented in Table 2.1 of Tranche 3 of Google's response to the Shopping RFI dated 10 August 2021. Specifically, the table shows for full year 2021:

- 36.2.1. Average, median, minimum and maximum spend on the Shopping Property in South Africa (by user location).

- 36.2.2. Average,⁴⁸ minimum⁴⁹ and maximum⁵⁰ cost-per-click (“CPC”) on the Shopping Property in South Africa (by user location).
- 36.3. The data were retrieved from Google’s data sources in USD⁵¹ and converted to ZAR by reference to SARB average exchange rates in each year.⁵²



- 36.4. The figure below shows full year 2021 figures for the data that was previously presented in “Density plot of total spend on the Shopping Property – Jan-Aug 2021” of Tranche 3 of Google’s response to the Shopping RFI dated 10 August 2021.
- 36.5. Specifically, the figure below presents total spend on the Shopping Property per every 10th percentile of merchants in South Africa (based on billing address) for full year 2021. These are calculated as follows:

⁴⁸ [Redacted]

[Redacted]

⁴⁹ [Redacted]

⁵⁰ [Redacted]

⁵¹ Google has compiled this response for the limited purpose of responding to this request, and in doing so has used systems that may not be used for financial reporting and that may not be published externally. Therefore, data included in the responses are not US GAAP and may differ from publicly reported revenue.

⁵² Exchange rate is obtained from <https://www.resbank.co.za/en/home/what-we-do/statistics/key-statistics/selected-historical-rates>.

36.5.1. [REDACTED]

36.5.2. [REDACTED]

36.6. The data were retrieved from Google’s data sources in USD⁵³ and converted to ZAR by reference to SARB average exchange rates in each year⁵⁴.

[REDACTED]

[REDACTED]

36.7. **Annex 36.3.1** shows full year 2021 figures for the data that was previously presented in Annex 5.1 of Tranche 3 of Google’s response to the Shopping RFI dated 10 August 2021. It presents total ad clicks and total ad impressions per every 10th spending percentile of merchants in South Africa (based on billing address) on the Shopping Property in South Africa (by user location) in 2021. These are calculated as follows:

⁵³ [REDACTED]

⁵⁴ Exchange rate is obtained from <https://www.resbank.co.za/en/home/what-we-do/statistics/key-statistics/selected-historical-rates>.

36.7.1. [REDACTED]

36.7.2. [REDACTED]

36.8. [REDACTED]

36.9. **Annex 36.3.2** shows full year 2021 figures for the data that was previously presented in Annex 6.1 of Tranche 3 of Google's response to the Shopping RFI dated 10 August 2021. It presents the following information for the top ten⁵⁵ and bottom ten merchants in South Africa (based on billing address) by spend on Google Shopping in South Africa (by user location) in each year between 2017 and August 2021:

36.9.1. average⁵⁶ cost per click on Google Shopping in South Africa (by user location);

36.9.2. total spend on Google Shopping in South Africa (by user location);

36.9.3. total ad clicks on Google Shopping in South Africa (by user location); and

36.9.4. total ad impressions on Google Shopping in South Africa (by user location).

36.10. Please note the following:

36.10.1. [REDACTED]

36.10.2. [REDACTED]

⁵⁵ Google notes that for 2017, the domain of the 10th ranked merchant (by spend) could not be recovered in its internal data sources. As such, data for the 11th ranked merchant (by spend) has been provided instead.

⁵⁶ [REDACTED]

- 36.10.3. Spend and cost-per-click data were retrieved from Google’s data sources in USD⁵⁷ and converted to ZAR by reference to SARB average exchange rates in each year⁵⁸.
- 36.11. **Table 36.3.1** below shows full year 2021 figures for the data that was previously presented in Table 9.1 of Tranche 3 of Google’s response to the Shopping RFI dated 10 August 2021. Specifically, the table shows for full year 2021, (i) total spend on Google Shopping in South Africa (by user location) and (ii) total spend on Google Search, broken out by spend on text ads and spend on shopping ads⁵⁹ in South Africa (based on user location) by merchants in South Africa (based on their billing address).
- 36.12. The data were retrieved from Google’s data sources in USD⁶⁰ and converted to ZAR by reference to SARB average exchange rates in each year⁶¹.

[REDACTED]

	Google Shopping spend (ZAR)	Google Search spend (ZAR)	
		Text ads spend (ZAR)	Shopping ads spend (ZAR)
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Source: Google.

⁵⁷ Google has compiled this response for the limited purpose of responding to this request, and in doing so has used systems that may not be used for financial reporting and that may not be published externally. Therefore, data included in the responses are not US GAAP and may differ from publicly reported revenue.

⁵⁸ Exchange rate is obtained from <https://www.resbank.co.za/en/home/what-we-do/statistics/key-statistics/selected-historical-rates>.

⁵⁹ As set out in the response to Question 35 of the Search, Shopping and Travel RFI dated 10 December 2021, [REDACTED]

⁶⁰ Google has compiled this response for the limited purpose of responding to this request, and in doing so has used systems that may not be used for financial reporting and that may not be published externally. Therefore, data included in the responses are not US GAAP and may differ from publicly reported revenue.

⁶¹ Exchange rate is obtained from <https://www.resbank.co.za/en/home/what-we-do/statistics/key-statistics/selected-historical-rates>.

36.13. **Table 36.3.2** below shows full year 2021 figures for the data that was previously presented in Table 10.1 of Tranche 3 of Google’s response to the Shopping RFI dated 10 August 2021. [REDACTED]

[REDACTED]

[REDACTED]

Year	Number of merchants with spend on Google Shopping and Shopping Ads	Of these merchants, the proportion that have spend on text ads on Google Search	% of merchants with spend on Google Shopping and Shopping Ads that have spend on text ads on Google Search
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

36.14. **Figure 6** below provides an update of Figure 6 of Tranche 3 of Google’s response to the Shopping RFI dated 10 August 2021 using data from Google Trends which shows navigational searches.⁶³ [REDACTED]

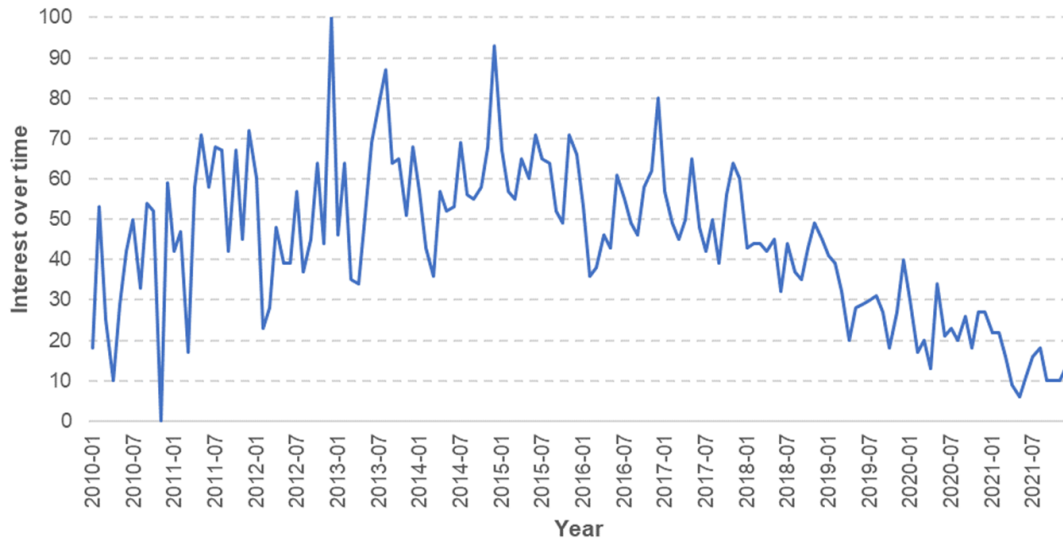
[REDACTED]

⁶² Spend data is pulled from Google’s internal data sources. Google has compiled this response for the limited purpose of responding to this request, and in doing so has used systems that may not be used for financial reporting and that may not be published externally. Therefore, data included in the responses are not US GAAP and may differ from publicly reported revenue.

⁶³ See: <https://trends.google.com/trends/explore?date=2010-01-01%202021-12-31&geo=ZA&q=pricecheck>.

⁶⁴ The y-axis (Interest over time) represents search interest relative to the highest point on the chart for the given region and time. A value of 100 is the peak popularity for the term. A value of 50 means that the term is half as popular. A score of 0 means there was not enough data for this term.

Figure 6
Google Trends for PriceCheck between Jan 2010 and Dec 2021



TRAVEL RESULTS ON THE SEARCH ENGINE RESULTS PAGE

45. For each of the following search terms (queries) “hotels Cape Town”, “accommodation Johannesburg”, “bed and breakfast Umhlanga”, “car rentals Durban”, “Radisson Red Cape Town”, “Long Street backpackers”, “Flights Johannesburg to Cape Town”, “Travelstart”, “Avis” and “TravelGround”, provide the following for each calendar year from 2014 to 2021⁶⁵:

45.1 The total impression volume of organic search results⁶⁶, impression volume of paid-for search results at the (a) top and (b) the bottom, the total impression volume of Google one-boxes (Google Flights, Hotels and Car rentals), and the total number of searches on the first search engine results page for (i) desktop and (ii) mobile web searches⁶⁷.

45.1. [Redacted]

⁶⁵ Answer on a separate spreadsheet if necessary.

⁶⁶ Note for the purpose of this exercise, Google’s one-box should be considered separately from organic or paid-for results.

⁶⁷ Total impression volumes asked in order to calculate out the average layout of paid-for, organic and one-box results on the first SERP for each calendar year over time.

[REDACTED]

45.2. For each of the queries listed above, **Annex 45.1** presents (i) the number of queries, (ii) the number of impressions of organic results⁶⁸ on the first SERP page, (iii) the number of impressions of text ads at the top of the first SERP page, (iv) the number of impressions of text ads at the bottom of the first SERP page, (v) the number of impressions of the Flights Unit, (vi) the number of impressions of the Hotels **Unit**⁶⁹ and (vii) the number of impressions of the local search unit that appears in response to queries for car rentals. The data are provided for desktop and mobile⁷⁰ separately.

45.2 The total impression volume of organic search results⁷¹, total impression volume of paid-for search results, the total impression volume of Google one-boxes (Google Flights, Hotels and Car rentals) above the fold and the total number of searches⁷² on the first search engine results page for (i) desktop and (ii) mobile web searches.

45.3. [REDACTED]

45.3 Total clicks, average click-through rates, total cost-per-click (“CPC”) revenues, average cost-per-click, total cost-per-acquisition (“CPA”) revenues and average cost-per-acquisition⁷³ for (i) paid-for adverts at the top of the first SERP, (ii) first three organic results on the first SERP, (iii)

⁶⁸ Organic results are limited to those in a “blue-link” block.

⁶⁹ [REDACTED]

⁷⁰ For the rest of this response, unless stated otherwise, mobile refers to mobile phones only.

⁷¹ Note for the purpose of this exercise, Google’s one-box should be considered separately from organic or paid-for results.

⁷² This figure should corroborate with that asked in the previous question.

⁷³ This is for business users using the CPA model.

second three organic results on the first SERP, (iv) remaining organic results on the first SERP, (v) paid-for ads at the bottom of the first SERP, (vi) Google’s Hotels, Flights or Car rental one-box on the first SERP, (vii) paid-for ads on the second SERP and (viii) organic searches on the second SERP⁷⁴. Where possible provide separate estimates for desktop web search and mobile web search.

45.4. As explained above, [REDACTED]

45.5. **Annex 45.2** presents total clicks, average click-through rates, total spend, and average CPC, for (i) text ads at the top of the first SERP page, (ii) first three organic results⁷⁵ on the first SERP page, (iii) second three organic results on the first SERP page, (iv) remaining organic results on the first SERP page, (v) text ads at the bottom of the first SERP page, (vi) the Hotels Unit⁷⁶ on the first SERP page, (vii) the Flights Unit on the first SERP page, (viii) the local search unit that appears in response to queries for car rentals on the first SERP page, (xi) organic results on the second SERP page, and (x) text ads on the second SERP page. The data are provided for desktop and mobile separately.

45.5.1. CTR is calculated as total clicks / total impressions.⁷⁷

⁷⁴ The Inquiry notes that total PPC and average CPC does not apply to organic searches and clicks on Google’s one-box.

⁷⁵ Organic results are limited to those in a “blue-link” block.

⁷⁶ Data are limited to the Hotels unit that is shown for categorical searches and excludes the Vacation Rentals Unit.

⁷⁷ [REDACTED]

45.5.2. Spend and average CPC figures are retrieved from Google's data sources in USD⁷⁸ and converted to ZAR by reference to SARB average exchange rates in each year.⁷⁹

45.5.3. [Redacted]

45.5.4. [Redacted]

45.5.5. [Redacted]

45.5.6. [Redacted]

⁷⁸ Google has compiled this response for the limited purpose of responding to this request, and in doing so has used systems that may not be used for financial reporting and that may not be published externally. Therefore, revenue data included in the responses are not US GAAP and may differ from publicly reported revenue.

⁷⁹ Exchange rate is obtained from <https://www.resbank.co.za/en/home/what-we-do/statistics/key-statistics/selected-historical-rates>.