



kelkoo Ciao! leGuide... ПИКЕКО вебмarchанд pagneprezzi koopkeus  
pncesavvy shopwahl mercamania webkupiec prisvis chaozen®... dooyoo®

The Hon. David Cicilline  
Chairman, House Antitrust Subcommittee

2138 Rayburn HOB  
Washington, DC 20515

The Hon. James Sensenbrenner  
Ranking Member, House Antitrust  
Subcommittee  
2449 Rayburn HOB  
Washington, DC 202515

House Judiciary Committee, Antitrust Sub-committee

Majority Staff and Minority Staff

**By Email and Electronic Transfer**

3 August 2020

Dear Chairman Cicilline and Ranking Member Sensenbrenner

Please allow me to congratulate you both and all the members of the House Judiciary Subcommittee on Antitrust for the hearing held on Wednesday last week. I admired the way the hearing was conducted and your bipartisan approach. Holding Big Tech to account for its long history of monopolistic and abusive market behaviour is key for not only businesses but for consumers too. The hearing has set a precedent and, no doubt, will set the agenda and tone for further probes, not least the forthcoming Senate Antitrust Subcommittee Hearing on Google Advertising in September.

Our business continues to be damaged by Google and its self-preferencing behaviour. Wednesday's hearing made it even more clear to us that there is irrefutable evidence that Google has been excluding competitors like us from search to the detriment of consumers and that its tentacles are clearly spreading further. As you rightly said, a business can sink or swim based on Google's decisions alone. How utterly terrifying not to have control over your own business – and this is how we feel about our business. I empathise with entrepreneur Brian Warner.

It is clear that Google is feeling the immense scrutiny that it is under. The Subcommittee posed a great number of pertinent and challenging questions that Sundar Pichai had difficulty answering. The case against stealing content from competitors and small businesses for its own gain is compelling. In line with this, as your questioning highlighted, Google's business model puts Google first and privileges its own properties.



kelkoo Ciao! leGuide... PIKENGO webmarchand pagneprezzi koopkeus  
pncesavvy shopwahl mercamania webkupiec prisvis choozen@\*\* dooyoo®

There is one outstanding point that I believe is worthy of further focus and which I would like to draw your attention to. That is whether Google deliberately (through manual penalties or simply the design of its algorithm) demotes competitor results on its search pages. Google has consistently said that it simply displays the most relevant results, and yet it also consistently displays its own services and hides competitors even if they are more relevant. Google does not seem to follow its own rules. The leaked FTC report in 2012 referred to demotions for shopping competitors and we expect that the same has happened in other verticals. We think that a follow up question on this, if answered fully and truthfully, could provide additional material for the forthcoming report.

To recap, I am encouraged that the US authorities, led by your Subcommittee, are taking the lead to seek workable remedies for Big Tech's anti competitive behaviours. We all know only too well that leaving Google to create its own remedies has seen a continued and predictable continuation of its abuses in Europe. I noted with interest that following the hearing Commissioner Vestager outlined her proposed strategy to tackle Big Tech in a written statement to the US House Judiciary Committee. My view remains that more can be done in Europe, but I am hopeful that your work will result in significant steps forward for businesses like ours in the US.

We look forward to the publication of the forthcoming report. If there is anything else I can assist either of you or your staff with, please do not hesitate to ask.

**Richard Stables**  
CEO, Kelkoo Group

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke at the end, positioned to the right of the name and title.