# ACCC Ad Tech Inquiry
# Interim Report
# ACCC requests for stakeholder feedback

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Assisted by relevant staff members

## Premise of this document

- On 28 January, the ACCC released the Interim Report in its ongoing Digital Advertising Services Inquiry (known as the **Ad Tech Inquiry**).
- The Interim Report contains many questions and requests for feedback from interested parties. This document sets out those questions organised by:
  - Requests for stakeholder views on the ACCC's six reform proposals, and
  - Questions for buy-side and sell-side participants organised by topic.
- The ACCC has asked for submissions in response to the Interim Report by **26 February 2021**. However, the ACCC will possibly accept submissions after this date. Submissions to be emailed to AdTechInquiry@accc.gov.au.

## Background to our submission

**About A&A Digital Services Pty Limited**
www.adopsandadtech.com.au

**Who are we?**
A&A (Ad Ops & Ad Tech) is a digital ad operations and ad technology support business. We have been operating for the past 10 years, since June 2011, supporting web publishers and agencies. We work predominantly with publishers (around 80% of our workload), with the balance being a mix of different sized ad agencies and direct clients.
I started the business in 2011 as I realised there was limited support in this area for publishers who really needed guidance and assistance in navigating this very niche and complex space, and that there was (and continues to be) a small pool of people with extensive experience. My previous work history also covered this niche, working in ad operations, digital media sales and digital media sales strategy since 1997. My team is similarly experienced in the digital media industry.

**Why are we submitting a response?**
We are considered experts in this very unique area. We work with a broad range of publishers - there is a very extensive list over the past 10 years but this can range from very small to very large and everyone in between. Essentially, any publishers who want to look at commercialising their digital assets (web, mobile, app) via display inventory.
**Why is our submission later than the deadline?**

Initially we were unsure if it was valuable for us to write a submission as we believed that the focus was on larger company submissions. However, as time has gone on and through discussions with a broad range of our industry contacts, we felt that we had a voice to add to this process as many of the publishers we work with operate in a different tier to some of the largest in market, and we wanted to ensure that their group was represented in this process as often they have much different and more limited options than some of the larger publishers involved in this process. We felt that we collectively represent a large subset of the market that as individual businesses may not contribute to the review.

**What services do we provide?**
Our primary function is to ensure that our clients can facilitate the delivery of digital ad campaigns most effectively - whether this is from the publisher side (where it's being delivered) or from the client/agency side (where it's being purchased).

This can take many forms, starting from a consulting overview to work out what they want to do, and what's required to get them there (both technologically and resourcing).

**General tasks include:**
- Review of digital assets (desktop, mobile, app)
- Documentation of desired outcomes
- Recommendation on technology OR updates to existing technology (where relevant)
- Provision of support required - technology, implementation, staffing etc
- Assistance with configuration/setup of technologies
- Assistance with setup of campaigns (either project based or ongoing)
- Training
- Reporting
- Ongoing technical support
- Assistance with optimisation of programmatic revenue sources

**Current list of supported clients can be shared during discussion - not for publication.**

**Google Reseller and Partner:**
It's important to declare that we are a Google Certified Publishing Partner, and a reseller of Google Ad Manager 360 and Google Campaign Manager. We also have a Google Display and Video 360 account. We have been a reseller for some years now - around 8.5 years for GAM360. We became a reseller originally because we realised that there were publishers in the market who could benefit from the technology, however were not large enough to qualify for an account directly with Google.
While we sell the technology, we are not what I would term a "sales house" where that is our primary function and revenue source.
We currently have a large number of clients on reseller contracts for GAM 360 and a smaller number for Campaign Manager.
We provide access to the technology as an option for publishers who wish to utilise the platform, however it's not a requirement to work with us that they purchase the technology. We work from the angle of whatever the publisher wants to do and whichever technologies they want to implement.

**Topline views:**
We believe there is merit in a number of the key items raised in this Inquiry, particularly around data usage, transparency and integration of ad tech. However, due to the global nature of many of the technology players we think it would be very difficult to practically implement local solutions to some of these issues. As you would be aware, there is a global initiative around identifiers and standardization of tracking and reporting and Australia needs to fall in with those solutions to be able to facilitate advertising by global

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agency groups and publishers who manage ad tech stacks internationally (we can provide examples of these clients).

**Structure of our submission:**
We have highlighted some of the ACCC questions/topics in blue font with the A&A responses following.  We have elected to respond in a reasonably high level of detail to some of the specific questions in the hope of providing perspective from a broader operational level, as well as by highlighting the different impacts these things can have on different sized publishers, depending on their ad tech setup..

*Note: We feel there is some overlap in some of the areas highlighted, so on some occasions have referred back to previous responses where relevant.*

**Please do not hesitate to contact us if you would like to discuss any of our responses.**

## Specific responses on a selected number of topics

The ACCC *invites stakeholders' views* on its six reform proposals. Interested parties are invited to provide comments on the proposals generally as well as (for some proposals) in response to specific questions set out below.

### Proposals to reduce data-related barriers to entry in ad tech:

1.  Measures to improve data portability and interoperability
    a.  Tools that increase data mobility at the request of a consumer or advertiser.
    b.  Tools that increase data mobility between firms without a request from a consumer.
2.  Data separation mechanisms that would prevent data gathered through one service being used in the supply of a different service
    a.  Data silos
    b.  Purpose limitation requirements

### Rules to manage conflicts of interest and self-preferencing concerns:

3.  The introduction of industry rules, including obligations to prevent sharing of information across ad tech services, to provide equal access to ad tech services, and for increased transparency

    Questions raised:
    - Are rules of this kind necessary to promote competition in the supply of ad tech services?
    - Do you consider whether the regulatory burden imposed by such a regime would be justified by the potential benefits?
    - If you consider such a regime should be implemented, what matters do you think such rules cover and what would be the best way for such rules to be implemented? In particular,
        ○ Is an industry-led solution practical/preferable?
        ○ Which aspects of current international proposals may be appropriate in Australia?
    - Do you consider that the provisions of the Competition and Consumer Act are currently sufficient to address competition issues arising from vertical integration in the ad tech chain?

**A&A Commentary**

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We think it's important to comment here with some context from our perspective around competition and integrations in the ad tech chain.

Firstly, a number of ad servers who provided either integrated or competitive services to Google Ad Manager and Google Ad Manager 360 either removed their product from the market to make it an in-house tool, or halted development some years ago, therefore failing to address some key needs in the market.

Specifically, the ability to "knit" together a range of products to cover all the ad tech needs that are required to facilitate a campaign.

Prior to Google's work on integrating buy and sell-side workflows, a typical campaign might require:
- Manual setup on both sides (publisher booking system, agency booking system), inability to digitally sign IO's
  OR
- Utilisation of Symphony (still in market in some agencies and requiring ENORMOUS amounts of maintenance from publisher partners to maintain - often doubling the amount of resources required on the publisher side from an ad ops perspective to maintain what is effectively 2 booking systems
- Campaign setup in buy side ad server (often more than one eg DCM, Sizmek etc), distribution of tags manually
- Campaign setup in publisher ad server, either pushed from publisher booking system or manually setup
- Additional tracking sometimes required from agency/client side for publishers to add client side tracking pixels directly on pages - delivering data directly to agencies
- Manual confirmation of campaign go-live
- Manual reporting setup and distribution - publisher system to agency, agency system to publisher
- Constant monitoring on both sides to catch reporting/delivery discrepancies due to different ad serving systems
- Discrepancy investigation onus on publisher to prove their numbers are "right" - often up to 40% discrepancy - accepted level requiring no agreed investigation was less than 10% difference in figures
- Difficult to resolve as caused by different system counting methodologies
- Usually ends with publisher running "makegood" until the agency booked figures have been met (equalling lost revenue to publisher)
- Final reporting - manual from publisher to agency
- Manual billing
- Revenue risk on unpaid bills held by publisher side
- Differing timezones for technology - AU time not supported and caused additional discrepancies, resourcing needs

From an ad operations, sales and revenue perspective, the above "standard operating procedure" was fraught with issues and required the publisher to have additional resources, lose revenue and inventory supply and also hold all the revenue risk if the agency declined to pay due to a discrepancy issue.

Agency side workflow was also inefficient and required significant operational resources.

For many years, both buy and sell side businesses wanted ad tech to be more closely integrated to solve these issues to improve turnaround times, reduce costs and protect publisher inventory.

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Google took this feedback seriously and worked with both sides of the chain to develop integrations which would solve these issues, and this is what currently operates across their ad tech stack. While both sides of the market use significant numbers of other tech within the mix, the key reason Google has been selected by so many companies is due to its superior features and the fact that using the stack provides a streamlined workflow which is not able to be replicated (either easily, or at all) by utilising other technology combinations.

There would certainly be an appetite in the market if other tech could be integrated without bringing back the original issues, but it comes down to the other tech companies having the desire, funding and time to develop solutions which are effective. Until this type of scenario could be actively deployed, we feel that it is possible that regulation could significantly hinder the digital media industry's ability to operate efficiently under its current requirements. To absolutely clarify, we feel there is currently potential for more negative than positive impacts from trying to implement regulation based on the current available tech solutions in the market.

We would also pose the question of whether the wider market has requested regulation in this space and what the outcomes desired would be from a practical perspective. The potential to undo some of the innovations that make our world far more efficient is concerning for us and our clients from an operational standpoint.

## Proposals to address opacity issues:

4.  A voluntary industry standard to enable full independent verification of DSP services

    The ACCC asks buy-side participants:
    -   Do you have to access the data you need to conduct verification of Google's ad tech services? If not, what data do you require that is not available?
    -   How does the ability to verify the performance of Google's DSP services compare to other DSPs?
    -   What measures would be most effective to ensure that all DSP services can be fully and independently verified?
    -   What are the risks to user privacy from third parties providing full verification services? Could such measures promoting this be implemented in a way that would protect the privacy of consumers?

5.  A common transaction ID to allow transactions to be traced through the supply chain

    The ACCC seeks stakeholder feedback on whether a common transaction ID would be effective to address potential transparency issues, and whether it is possible to implement a common transaction ID in a way that protects user privacy. In particular:
    -   Would a common transaction ID assist in making pricing and auctions more transparent?
    -   What risks does a common transaction ID pose to user privacy?
    -   How could a common transaction ID be implemented in a way which mitigates any risks to consumers' privacy?
    -   How should such a recommendation be implemented?

6.  A common user ID to allow tracking of attribution activity across the supply chain (but which protects privacy)

    The ACCC is interested in views on the following questions:

- Would a common user ID be an effective way to improve transparency in the ad tech supply chain?
- Could this proposal be implemented practically and is it justified?
- Could this proposal be implemented in a way which protects consumers' privacy? If so, how?

More broadly, in relation to its proposals opacity issues, the ACCC is interested in stakeholder views regarding:
- The ability for publishers to access information necessary to make informed decisions regarding bidding in auctions and auction results,
- The ability for advertisers and publishers to have access to information necessary to understand and verify prices charged for the purchase or sale of ad inventory, and the prices charged across the ad tech supply chain, and
- The ability for advertisers to independently verify ads displayed on Google's owned and operated inventory, specifically YouTube, and conduct attribution through independent third party providers.

## Proposals to reduce data-related barriers to entry
1. Measures to improve data portability and interoperability, including:
   a. Data portability: a user could instruct Google or Facebook to make data on their interactions on those platforms available to a news publisher or another social network on request via a user-friendly interface.
   b. Data interoperability:
      i. Requiring firms with a significant data advantage to offer access to competitors in adjacent markets to specified types of data in a standardised format,
      ii. Common transaction ID or user ID.

In the Interim Report, the ACCC invites stakeholders to provide views on a large number of matters. These are set out below, arranged by reference to the Interim Report's broad topic areas.

### A. Industry background
*Buy-side:*
- To what extent are video and non-video display advertising substitutable?
- To what extent do advertisers use more than one advertiser ad server, demand-side platform, or ad verification and attribution provider and the factors that inform their decision?

*Sell-side:*
- To what extent do publishers use more than one publisher ad server or supply-side platform? What factors inform their decision in this regard?

**A&A Commentary - Sell Side**

In our day to day function, we see many different combinations of ad technology in place.  Note, our commentary here is for publishers who are implementing their own, standalone ad technology stack, and excludes publishers who are implementing a 3rd party technology and monetisation solution, such as offered by Publift or Interplay Media (as examples).

Generally, publishers will have one primary ad server which facilitates display, native and video advertising across their digital assets (web, mobile, app).  Occasionally, there may be another ad server which facilitates email advertising.  It's uncommon for publishers to have more than one primary adserver, however we do know of some instances where this is the case.

We feel it should be highlighted that there are many factors that go into the selection of a publisher ad server, and that the entire process should be factored in. Trying to micro-focus on elements such as RTB doesn't necessarily take into account the broader (and usually more significant) requirements to deliver out premium advertising,

**Selection process for publishers when choosing an adserver:**
- Requirements analysis all desired advertising solutions
- Review of content and video management systems to determine integration requirements
- Review of technology options in market, selection

**Key factors in selection of an ad server:**
- What type of ads do they want to run (eg display, video instream, video outstream, native, out of page, email etc)
- What is the size of the inventory pool they are forecasting
- Additional requirements (eg Audience targeting)
- Programmatic advertising requirements (eg do they have sales team and plan to do PG and PD, open marketplace etc)
- Support options available
- Internal resource requirements
- Price
- Timing - immediate requirements and urgency, along with mid-longer term requirements

**Key factors in selection of an SSP:**
- Has the publisher elected to use Google Ad Manager 360
- If so, this comes with AdX which is an excellent SSP solution
- Other SSP options are dependent purely based on their volume of ad impressions or ad type (eg video, audio, etc).
- Suitability to partner with an SSP is determined in direct discussions with SSP partners to determine their willingness to work with publishers - which they decide on a case-by-case basis.

**Indicative setup of a small /novice publisher**
- No ad sales team
- No ad tech team
- No direct sold ads - No ad server - hard-coded AdSense on pages
  OR
- Some direct sold ads - Free ad server (eg Google Ad Manager with AdSense backfill)

**Indicative setup of a medium publisher**
- Small ad sales focus - not a team
- No ad tech team, or limited resource/capability
- Larger percentage of sold ads (CPM and Sponsorships) - Free ad server (eg Google Ad Manager with Adsense backfill)
  OR
- Larger percentage of sold ads (CPM and Sponsorships) - Ad server (eg Google Ad Manager 360 with AdX to facilitate both Programmatic deal types and backfill through open exchange)
  OR
- Larger percentage of sold ads (CPM and Sponsorships) - Ad server (eg Google Ad Manager 360 with AdX to facilitate both Programmatic deal types and backfill through open exchange) plus one other demand partner (eg Magnite, Pubmatic, Index Exchange), facilitated through Open Bidding integration

**Other solutions regularly seen:**

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- Video demand partners
- Additional creative solutions - eg InSkin, Playground XYZ, Bonzai
- Programmatic direct partners - eg AdSlot

**Indicative setup of a large publisher**
- Ad sales structure in place, including support staff
- Full ad tech team
- Larger percentage of sold ads (CPM and Sponsorships) - Adserver (eg Google Ad Manager 360 with AdX to facilitate both Programmatic deal types and backfill through open exchange
- Multiple demand partners - Magnite, Pubmatic, Index Exchange
- Utilisation of additional header bidding solution
- Video demand partners
- Additional creative solutions - eg InSkin, Playground XYZ, Bonzai
- Programmatic direct partners - eg AdSlot
- Email ad server

Additional monetisation solutions usually have a minimum required inventory threshold to enable a trading agreement.  Creative solutions such as Bonzai are in high demand by advertisers, but often also have platform fees which can be significant, therefore are often only viable for a publisher with a large inventory volume.

**Why do more publishers use Google Ad Manager and Google Ad Manager 360 than other ad servers?**
This is a key question.  As mentioned above, even though we are a GAM360 reseller, we are not exclusively bound to using that product.  However, from our perspective as specialists in the ad tech and ad operations space, these products are best of breed and provide publishers with a stable base and also with maximum capabilities for their ad serving needs.

Other ad servers, in our experience, tend to have more limitations, specifically around:
- Workflow efficiency (convoluted setup process, more time required for setup, up to 400% increase when compared to GAM versions)
- Limited video capability
- Limited audience targeting capability
- Lack of local support resource, resulting in extended turnaround times when dealing with global support teams
- Less publicly-available support documentation, in line with a lower market presence

GAM 360 also provides publishers with an automatic gateway to programmatic monetisation through AdX. Without this integration, the majority of the publishers we work with **would not** be able to monetise their inventory outside of their direct sold campaigns, as they would not qualify for other demand partner contract thresholds and would therefore have unsold inventory and a lesser revenue opportunity than they are able to have with AdX in the mix.

In addition, the Open Bidding capability of GAM 360 provides an easy way for larger publishers to integrate demand partners they have contracts with.  Prior to this, it was less efficient to integrate partners as most publishers (even large ones) did not have the technical resourcing or capability to implement a standalone Prebid header bidding solution as it was an arduous integration.

Managed Prebid services do offer a less resource-heavy option for publishers to consider although many do attract CPM usage charges and/or revenue shares which publishers do need to take into account when weighing up the economics of these platforms.

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Open Bidding really drove the upswing in programmatic revenue across the ad market and enabled publishers to maximise the yield on each impression, where previously they worked on a tag based waterfall setup which was not automatically optimised around yield and generated less revenue.

**A&A Commentary - Buy Side**

It's extraordinarily common to use more than one DSP. The majority of big players are using DV360 & The Trade Desk as a minimum. Choices based on audiences, targeting integration, different publisher access, and in some cases it comes down to comfort levels with the interface. One single ad server to manage all tags and attribution is still the key to ensure that all data is collected and attributed correctly.

Google Campaign Manager and Sizmek are the key players in this space. There are other smaller providers but they tend to be more niche and may be more focussed on creative solutions than attribution.

Smaller buyers are more likely to be using Google Ads as it is an easy sign up process which doesn't involve contracts and platform fees. It is important to have this access for smaller buyers as they can then compete with everyone else on the open market.

### The role of data
*Buy-side*
- What has been/will be the impact, if any, of Google's restrictions on participants' ability to access ad targeting and ad attribution data, including:
  - Google blocking advertisers' ability to access its DoubleClick ID?
  - Google's proposal to replace third-party cookies on Chrome?

*Sell-side*
- What has been/will be the impact, if any, of Google's restrictions on participants' ability to access ad targeting and ad attribution data, including:
  - Google removing the ability for publishers to link bidding data from Google's SSP (Google Ad Exchange) to the impression-level data from Google's publisher ad server?
  - Google's proposals to replace third-party cookies on Chrome?

**A&A Commentary - general**

Apple has already restricted the use of cookies which has forced changes through the industry for both targeting and attribution. This has forced changes in the way that inventory is purchased and means that Safari/iOS users cannot be accessed using cookies/audiences. When users are reached using contextual buys or specific publishers this cannot always be correctly attributed.

Campaigns are purchased using a variety of targeting methods:
- First party audience targeting
- Exclusion targeting
- Publisher specific targeting
- Third party audience lists
- Affinity and in market targeting
- Demographic targeting
- Contextual targeting
- Keyword targeting
- Geographic targeting.

The end user experience will be affected by changes to cookies if we cannot use them to ensure that appropriate ads are served and we don't waste time showing ads for products they have already purchased, or have indicated that they are not interested in.

**A&A Commentary - additional Sell Side comments**
The barrier for many publishers to even consider analysing bidding data at this granular level is having available resources with the necessary skill set. This often puts the data out of reach for many small-to-mid sized publishers, so in general they would not be adversely affected and the higher-level yield analysis data is often sufficient to make pricing decisions upon.

The third-party cookie replacement scenarios are still constantly evolving. Publishers who have a deep integration with Google ads platforms will naturally be more dependent on where Google lands with these proposals, in relation to how SSP and DSP signals are passed in a privacy-first manner.

The logical expectation is that Google would be unlikely to set AdX publishers adrift without an equivalent, privacy-compliant way to achieve these objectives given their revenue importance.. If the GAM and AdX platforms weren't as closely integrated as they are, Google may have been less incentivised to ensure continuity in this area due to the potential technical restraints from moving data in and out of their shared channels.

For publishers who also employ Prebid wrappers, the proposed third-party identity solutions such as Liveramp or Unified ID will still need to find a way to work with Chrome's privacy sandbox, given it's dominant browser share.

## Industry structure and nature of competition
*Buy & sell-side*
Industry consolidation
- Examples of notable entry or exit in the supply of ad tech services, including possible reasons. (In addition to those already listed in Appendix E of the Interim Report.)
- The factors that ad tech providers compete on and their relative importance.

Importance & ease of integration between ad tech services
- How important is it for an ad tech provider to have an integration with another ad tech service? In particular, does an integration provide particular access to advertisers, publishers or ad inventory?

    - How difficult is it to establish integrations with other ad tech services (e.g. the cost and time involved)? Have you experienced issues in establishing integrations with other ad tech services?

    - The role of integration service providers such as BidSwitch?

**A&A Commentary**

We have addressed some of these points above in more detail. The key points here are that from a digital delivery perspective, it's incredibly important that ad tech is able to integrate in a way that provides a (reasonably) streamlined workflow and that data/reporting is able to be matched throughout the process. Without this, we hark back to the situation we operated in approximately 10-15 years ago where significant amounts of time were spent manually managing setups, reporting, discrepancies and huge inefficiencies in the entire buy to sell side process.

One of the upsides for publishers from Google Ad Manager's high market share has been the number of ad tech partners with a documented and fully-tested integration with the platform. The vendors themselves understand the need to have this capability and this wasn't always the case 10-15 years ago.

**Additional ACCC questions**
*Buy-side*
Multi-homing
The ACCC's preliminary view is that advertisers are unlikely to multi-home because advertiser ad servers function as a central hub which advertisers use to manage the delivery, tracking, and verification of all their digital ads, and switching costs are likely to be significant. It seeks stakeholder comments on:
- limits to advertisers multi-homing,
- Advertiser switching costs,
- Importance of integration with DSPs and other ad tech services for advertisers,
- The types and sizes of set up and maintenance costs (including regulatory costs), and
- Recent entry and exit of advertiser ad servers.

**A&A Commentary**

As mentioned earlier, the additional costs and workload required to multihome is a deterrent for advertisers, however they will continue to use multiple platforms and rely on their single server as a source of truth.

Competitive dynamics of DSPs
The ACCC is considering the competitive dynamics of DSP services and the degree of competitive constraints faced by Google as the major provider of these services. It seeks stakeholder feedback on:
- the importance of exclusive access to ad inventory,
- prevalence of single-homing versus multi-homing,
- switching costs,
- the importance of access and use of data,
- vertical integration,
- whether there are any substantial differences between Google Ads and Google's Display & Video 360, and
- set up and maintenance costs associated with the establishment of a DSP service, The ACCC is also interested in stakeholder views about the substitutability between DSPs and ad networks.

**A&A Commentary**

Mentioned earlier, Google Ads is essential for smaller advertisers to compete on a level playing field against the larger advertisers & agency groups who have the scale and additional budget to use DV360.

*Sell-side*
Competitive dynamics of SSPs
The ACCC is continuing to consider the competitive dynamics in the supply of SSP services and the degree of competitive constraints faced by Google as the major provider of these services. It seeks stakeholder feedback on:
- access to advertisers,
- access to data,
- the need for and difficulties associated with attaining integrations with DSPs and publishers (including header bidding),
- the potential incentives to multi-home,

- switching costs, and
- set up and maintenance costs,
- the substitutability between SSPs and ad networks.

Competitive dynamics of publisher ad servers
The ACCC is continuing to consider the competitive dynamics in the supply of publisher ad server services and the degree of competitive constraints faced by Google as the major provider of these services. The ACCC is particularly interested in:

- the links between Google's publisher ad server and its SSP,
- the presence of other non-Google publisher ad servers ,
- pricing of publisher ad server service,
- set up and maintenance costs,
- the prevalence of single-homing, and
- switching costs.

**A&A Commentary**

We feel that we have addressed this in some detail in previous responses within this document.

Quite simply, the ease of implementation, training and continued support from the Google product team/informational channels(the entire Google online community) means that for smaller publishers (in particular) and also for larger publishers, the ability to plug in an established adserver and SSP is a smooth, reasonably well documented and supported process. Implementing other tech, adserver or SSP, with little to no local support or operation generally often does not make sense where the goal is to have continued and uninterrupted ad serving and sales service.

**Vertical integration & conflicts of interest**
*Buy-side*
- How important is access to YouTube ad inventory to advertisers in Australia?
- Do advertisers consider that multi-homing is a viable option for DSP services?
- Do advertisers consider that they must have access to Google's DSP service?
- Apart from YouTube ad inventory, is access to other exclusive ad inventory sold through the ad tech supply chain essential?
- How easily are advertisers able to purchase YouTube inventory directly, or through YouTube partners? Is this a viable option for all advertisers? Are there advantages to purchasing from YouTube ad inventory via the ad tech supply chain, rather than directly?

*Sell-side*
- Does selling ad inventory through multiple DSPs create privacy or technical problems for publishers?
- How important is access to Google Ads demand to publishers? [*The ACCC preliminary view is that in order to access the full demand of Google Ads, publishers must use Google's SSP, so it is testing the importance of Google Ads demand vs other sources available to publishers*].
- Do publishers consider that Google Ads demand is accessible through non-Google SSPs? [*The ACCC preliminary view is that in order to access the full demand of Google Ads, publishers must use Google's SSP, so it is seeking views on the the degree to which Google Ads demand is available through other SSPs*]
- How important is access to Display & Video 360 demand to publishers?
- Do publishers consider that Display & Video 360 demand is accessible through non-Google DSPs?

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- Can bids from Google's SSP, or demand from Google Ads be accessed from non-Google publisher ad servers?
- Are there any impediments or disadvantages to using a third-party publisher ad server, due to the way that Google's SSP interacts with it?
- Why might an SSP decide not to participate in header bidding? Do any other SSPs refrain from participating in header bidding auctions (or similar auctions)?

**A&A Commentary - Sell Side**

- Using multiple sources to buy or sell digital advertising creates a revenue benefit for most publishers but can also open up tech and privacy issues. Publishers are encouraged to deal with trusted buyers, however this isn't always possible on the Programmatic Open Market.
- Plugging in additional sources of demand can increase the revenue outcome for that publisher and increase the demand for their media, but it also increases workload in general (audit trails, reporting, forecasting, makegood, optimising, pricing. reconciling).
- Education and keeping abreast of what's available to purchase and through which channel within buying teams remains a common issue, For example, they could be unaware that there are other buying options available, or their selections could simply be due to reusing previous strategies to save time and resource, cost of inventory or just general preference and so we are unable to infer an answer on this.
- A high priority item listed as an additional impediment to using some 3rd parties is the speed at which an ad is actually delivered to a user. Using Google Ad Manager and Google SSP means that an ad can be delivered at a very fast speed. This is imperative for our industry (where an ad must be delivered in mere milliseconds - not seconds) as the average tolerance of web users for page load is around 2 seconds.
- An SSP may decide not to participate in header bidding as it can create a costly work trail that may cause more cost than is gained in revenue for a publisher (tech and resource cost).

**Pricing, fees and margins in ad tech**
*Buy & sell-side*
- To what extent are ad tech providers able to charge undisclosed fees? To what extent, if any, does this impact on competition? What would be the potential benefits from improved transparency in this regard?

**A&A Commentary - Sell Side**

Where contracts are not read, or not understood, by all roles that require them, legitimate fees that are 'undisclosed' in report auditing trails can be missed.

For example - when reporting on each SSP, a user may need to know both Gross and Nett costing to ensure correct forecasting and revenue is reporting upwards into the business. These figures are not always readily available within the SSP reporting platform.

Further, the fee information may never 'passed on' to those employed in the role of reporting and forecasting and therefore 'undisclosed' fees may just be 'misunderstood' or 'mis-reported' fees which could easily be reported into businesses incorrectly.

**Transparency**
Auction transparency
*Buy & sell-side*

- What information do you need **about auctions** used by an ad tech provider to assess and compare their services to others in the supply chain?
    a. Why do you need this information and how do/would you use it?
    b. Do you receive this information?
    c. If you do not receive this information, have you sought to obtain this information?
- What information do you require, and what do you receive, on the following:
    a. The factors which are used by auction algorithms to select the winning bidder?
    b. The factors used by a bidding algorithm to determine a bid price?
    c. Post-auction information?
- Are there differences in the auction information provided by ad tech providers? If so, please explain these differences?

*Sell-side*

- Do publishers currently receive sufficient information from SSPs to verify the accuracy of the fees charged?
- Does the availability of such information vary between SSPs?

**A&A Commentary - Sell Side**

In order to assess and compare tech providers, one would normally seek out advice from others that have used the product or a company such as A&A who have a broad understanding and multi-layered engagement with many tech partners on behalf of clients.

Once anecdotal information has been reviewed (or if not able to be gathered), the next step would be to set up a scoping meeting to discuss various options/product provisions. Generally, access to advertiser, buyer and trade desk information is required for full transparency - both for security and competitive reasons.
Additionally, bid and ad request information is necessary to assess if the tech provider is going to provide a revenue positive solution.  In most cases this information is available (on request),

Reviewing all bidding information or post auction information is a resource heavy requirement for a business, and so is not always done. Programmatic buying and selling is dynamic, so buyers in the market today are not necessarily the same as in the market tomorrow.  Therefore,  post-analysis actions may not be as valuable as 'on the fly' selling changes. For example, post auction information is typically only valuable in a short space of time after the buyer is out of the market, and is dependent on the method of sale (typically Open Market sale).  This does not apply for direct 1:1 programmatic sales, and remains a crucial part of the sales process.

Fees charged by SSP's don't tend to be readily available in reporting interfaces, but are covered in contracts and people within businesses need to be aware of what these are when reviewing revenue and performance of SSP partners.   Often, manual calculations are required from base system reports to be able to audit final end of month figures.

*Buy & sell-side*

- What information about fees charged across the supply chain is available to advertisers and publishers?
    a. Why do you need this information and how do/would you use it?
    b. Do you receive this information?
    c. If you do not receive this information, have you sought to obtain this information?
- What additional information about fees or take rates do advertisers and publishers require?
- How does a lack of information about fees or take rates impact the ability of advertisers and publishers to make informed choices about how they will use services in the ad tech supply chain?

**A&A Commentary - Sell Side**

Access to fee information can help assess forecasting opportunities in Nett figures. Disclosing these fees 'may' discourage sales via different platforms (if they are not as competitive once charges and revenue shares are taken out of the gross sale figures) .

Really, it comes down to the publisher to have business reporting and rules in place to ensure that they are maximising their revenue from all channels and aren't looking at them in silos.  This is something that generally larger businesses do effectively but smaller businesses may not be aware of and need assistance with.

An education piece around this would be beneficial to many publishers in the market.

Quality and reliability of ad verification and attribution services
*Buy & sell-side*

- Are you satisfied with the services provided by verification and attribution providers? If not, what are you not satisfied with regarding their service?
- Do you consider that the metrics you received from your verification and attribution provider are accurate?
- Would you be able to switch measurement and verification providers if you wanted to? What are the largest obstacles to you switching, if any?

**A&A Commentary - Sell Side**

It's reasonably clear to us as a business that the use of ad verification services suffers a lack of education within some pockets of the Australian industry. Far too often, these verification services are applied to a campaign where  they end up hindering the setup and delivery of the entire campaign. This is due to the services being applied incorrectly which then results in a very bad ad experience from client, publisher and through to the end user who sees the ad.  This then requires additional resources on both ends to resolve.

**A&A Commentary - Buy Side**

We consider that this piece in particular is of concern within the Australian buy side industry. These tools need to be supported and trained correctly for use prior to rollout, otherwise it can be detrimental to the outcome of a campaign on all sides.

Verification and attribution of Google's services
*Buy-side*

![a&a logo]

- Are advertisers able to independently verify the performance of ads served on YouTube?
- Can third party verification and attribution providers access sufficient data through the Google Data Ads Hub to independently verify the performance of ads served on YouTube? If not, what data do verification and attribution providers require access to in order to perform this function?
- Does providing third party verification providers with access to raw data, or allowing them to place verification tags (or pixels) on ads, create privacy concerns?

## Third party attribution services
*Buy-side*

- Are advertisers currently able to conduct effective and independent attribution of their ad campaigns?
- Will upcoming changes Google is making to the data it shares and Google Chrome affect advertisers' ability to conduct multi-touch attribution? If so, what will this impact be?
- Will access to the data via the Google Ads Data Hub allow advertisers to conduct full and independent attribution of Google's DSP services?
- Does the use of user IDs and cookies in providing attribution services create privacy concerns?
- Do stakeholders consider there are any other issues with the ability to conduct attribution of ad tech services?

*Sell-side*

- What challenges do publishers face in their inventory being blocked due to brand safety issues?
- Do publishers experience any problems in dealing with or negotiating terms with measurement and verification providers?
- Are measures, such as standardised taxonomies, or requirements on verification providers to provide publishers with information about changes to their processes, required to address issues with verification
- providers blocking legitimate publisher websites?

## Extent of ad fraud and measures to prevent it
*Sell-side*

- What is the scale of the problem posed by the publication of scam ads on publisher websites?
- What are the risks to publishers when scam ads are displayed on their properties?
- What measures do ad tech providers take to prevent the delivery of scam ads?
- What measures are available to publishers to stop the delivery of scam ads once they are identified?
- Are there difficulties experienced by publishers in stopping scam ads being delivered to their properties? If so, what are they?

**A&A Commentary - Sell Side**

Scam ads are an ongoing issue. Unfortunately, the more tech plugged into a publisher programmatic stack, the harder it is to audit in a legitimate way and to keep the chain clean.

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Most programmatic tech does not provide simple tools to track/find offending creative, and publishers have to provide extensive  information for the vendor to be able to try and find any offending ads. In many cases, the vendor can only block by domain or 'advertiser' name, which is not helpful when neither of these are obvious.

However, the creative preview tool within the Google AdX platform allows publishers to search for 'offending' scam ads by simply typing in some of the words, or a domain located in the ad (generally all the information given by a user reporting in a scam ad.) In our day to day experience, the Google AdX programmatic creative review is superior to other products in the market, as it allows publishers to find and block very quickly.

There should ideally be a better auditing process from a buying perspective to stop 'scam' ads in the market in the first place.