



ACCC Digital Platform Services Inquiry

September 2024 report on “revisiting general search services” (DPSI 9)

Google’s supplementary submission to the ACCC

26 July 2024

On 3 May 2024, we responded to the ACCC’s Issues Paper as part of its Digital Platform Services Inquiry September 2024 report revisiting general search services. Subsequently, the ACCC published a number of third party submissions that either contain fundamental inaccuracies or provide anecdotal or isolated claims. In this brief supplementary submission, we respond to claims raised in submissions relating to “preferential” ranking and quality of search results.

We take this opportunity to share more details as we don’t believe the third party submissions provide a credible basis to conclude that Google engages in any practice of preferential search ranking or, more generally, that there is a lack of search competition or that Google operates free from competitive constraints in supplying search services to Australians.

To the contrary, the evidence before the ACCC strongly supports a finding that Google actively competes, and has invested and innovated significantly to maintain and improve the quality of its search services to attract and retain users (including advertisers) against a broad range of other available options. This includes the detailed information Google has provided, including in its Issues Paper submission, on the competitive environment in which Google Search operates, as well as Google’s ongoing and extensive investments to achieve improvements in search quality.¹ We do not repeat this information here, but this supplementary submission should be read together with our earlier observations on this topic.

We trust that the ACCC will critically and independently assess the relevance and cogency of stakeholders’ claims in this context. We encourage the ACCC to consult with us before relying on anecdotal or isolated claims in its September 2024 Report. We believe the opportunity to provide additional insights and evidence – where they directly relate to the services that we offer – will enable the ACCC to reach more robust and well-informed findings. We would be pleased to discuss any of these matters further.

Assertions about “preferential” ranking are misplaced

Some submissions contain inaccurate assertions about alleged “preferential” ranking by Google Search.² The submissions demonstrate diverging views, with some submissions alleging “self-preferencing” simply in response to other search results being ranked higher. Many of these submissions are from businesses that have been outranked by their

¹ See Google, [Submission to the Australian Competition and Consumer Commission](#), *Digital Platform Services Inquiry No. 9* (3 May 2024) sections 1-2.

² See e.g., Special Broadcasting Service, [Submission to the Australian Competition and Consumer Commission](#), *Digital Platform Services Inquiry No. 9* (May 2024); Asia Travel Technology Industry Association, [Submission to the Australian Competition and Consumer Commission](#), *Digital Platform Services Inquiry No. 9* (May 2024).

competitors and have not provided robust data or evidence to support their assertions of Google engaging in preferential ranking.

Arguably, if Google were to favour these businesses in its Search rankings (without that being justified on the basis of quality), that would lead to a corresponding *decrease* in the ranking of higher quality search results from these businesses’ competitors. This would be inconsistent with Google’s fundamental principle of delivering the highest quality and most helpful results to users.

The presentation and ranking of search results on Google is based on algorithms that use machine learning systems to interpret queries and identify the most relevant, reliable and trustworthy content in response to those queries.³ We devote significant resources to continuously improve these algorithms to ensure they are consistently prioritising websites with high quality content and a positive user experience.⁴

These ranking systems are designed to sort through hundreds of billions of web pages and other content in Google’s Search index to present the most relevant, useful results to users in response to a query in a fraction of a second.⁵ The algorithms that underpin these ranking systems take into account many factors and signals to provide users with the most useful information.⁶ Some of these factors include (in no particular order) the meaning and words of the query, the relevance and usability of web pages, the expertise of sources, page speed, and a user’s location and settings (including their past search history and search settings).⁷ The weight given to each of these factors also varies depending on the nature of the query.⁸ These factors, in combination, influence how Google’s Search ranking system determines what results are most useful and relevant to a user at the particular moment when they enter their search query.⁹

Against this backdrop, we have responded to three specific issues relating to “preferential” ranking raised in submissions by other stakeholders. We trust that in the course of preparing its September 2024 Report, the ACCC will continue to test these stakeholders’ claims. We stand ready to engage with any further questions the ACCC may have on these issues.

³ See Google, [Submission to the Australian Competition and Consumer Commission](#), *Digital Platform Services Inquiry No. 9* (3 May 2024) 11.

⁴ See Google, [Submission to the Australian Competition and Consumer Commission](#), *Digital Platform Services Inquiry No. 9* (3 May 2024) 10-15.

⁵ [‘How Results Are Automatically Generated’](#), *Google Search* (Web Page).

⁶ [‘How Results Are Automatically Generated’](#), *Google Search* (Web Page).

⁷ [‘How Results Are Automatically Generated’](#), *Google Search* (Web Page).

⁸ [‘How Results Are Automatically Generated’](#), *Google Search* (Web Page).

⁹ [‘How Results Are Automatically Generated’](#), *Google Search* (Web Page).

**A. Google Search aims to surface the most helpful and relevant information to users
- it does not arbitrarily rank international content or content from high spending
advertisers above Australian content**

Google’s Search ranking systems are designed to present and prioritise helpful, relevant, and authoritative sites.¹⁰ This principle guides (and is the touchstone of) the presentation of Search results in response to each and every user search query. Accordingly, claims that Google arbitrarily prioritises lower quality websites (including those of high spending advertisers or large, international websites)¹¹ are incorrect.

Whether or not a website belongs to an advertiser is not a factor relevant to Google’s organic search results. The ranking of our results depends on many variables.¹² Google’s Search ranking systems will prioritise results that have been holistically assessed to contain higher quality content over results that have been assessed to have lower quality content. In other words, optimising a website for specific individual metrics without improving the overall helpfulness, expertise, authoritativeness and trustworthiness of that website’s content will not guarantee a higher ranking of that website.

For instance, a website’s PageSpeed Insights (PSI) scores¹³ – which reports on the user experience of a page on both mobile and desktop devices, and provides suggestions on how that page may be improved – provides site operators with insight into page performance, which is *one* factor we use to determine the ranking of search results. What matters is how a website performs across *all* relevant metrics that are used to determine whether a webpage is helpful to a user.

If Google were to prioritise websites that optimised a specific metric or set of metrics (without necessarily providing high quality content overall), that would lead to degradation in overall search quality, and result in the proliferation of websites trying to ‘game’ Google’s Search ranking systems. This is not merely a theoretical concern. There are millions of low-quality and spammy sites that try to game their way to the top of our Search ranking, and we make frequent “core updates” to our algorithms to distinguish between these low quality sites that have been curated to manipulate rankings, and high quality helpful websites, and to continually improve our ability to detect evolving practices of this nature.¹⁴

¹⁰ ‘[Creating Helpful, Reliable, People-First Content](#)’, *Google Search Central* (Web Page).

¹¹ See e.g., Nick Ross, [Submission to the Australian Competition and Consumer Commission](#), *Digital Platform Services Inquiry No. 9* (May 2024).

¹² See our discussion above on the factors that underpin our Search ranking systems, including the meaning and words of a query, the relevance and usability of web pages, the expertise of sources, page speed, a user’s location and settings.

¹³ Referred to in Nick Ross, [Submission to the Australian Competition and Consumer Commission](#), *Digital Platform Services Inquiry No. 9* (May 2024).

¹⁴ See Google, [Submission to the Australian Competition and Consumer Commission](#), *Digital Platform Services Inquiry No. 9* (3 May 2024) section 3.2.

It is also incorrect that Google arbitrarily prioritises international content over Australian content.¹⁵ In response to a search query from an Australian user, Google's Search ranking systems will prioritise results that are most helpful and useful to that user's exact query, and a user's location is one of many relevant signals used to surface the most helpful results. Our systems recognise that many types of queries have a local intent, so that when you search for 'pizza', you get results about nearby local businesses that deliver. Localisation is also particularly important for certain categories of queries - for example, finance, news and health - such that queries like 'open a savings account' or 'car insurance' or 'parliament' are more likely to surface results that are local.

However, for other queries, the most authoritative, trustworthy and helpful sources of information in response to a query may be located overseas rather than local results.¹⁶ For example, lawyers researching the laws of other countries would typically be looking for the original source, not an Australian summary.

In all cases, Google Search prioritises the most relevant, trustworthy and helpful responses to that particular search query - analysis which is based on rigorous testing and a long history of product innovation and improvement.¹⁷

B. Google Search does not preferentially rank YouTube or parties with which it has a partnership

SBS has asserted that Google Search preferences YouTube and parties with which it has a partnership (such as Reddit) in Google's search results.¹⁸ This is not correct.

This assertion in relation to YouTube appears to be based on a description of Google's search results from a single search query where YouTube outranked content from an SBS affiliate. These search results do not show any self-preferencing by Google in favour of YouTube. As outlined above, in ranking search results, Google uses many signals and factors to evaluate web pages.¹⁹ Each of these signals evaluate content found on YouTube web pages in the same way they evaluate content on third-party web pages, and they do not evaluate any information from YouTube that third-party web pages do not also have the opportunity to provide. YouTube is a popular video hosting site that is highly valued by users. It is straightforwardly good for search quality that Google's ownership-agnostic signals take account of that fact.

¹⁵ Nick Ross, [Submission to the Australian Competition and Consumer Commission](#), *Digital Platform Services Inquiry No. 9* (May 2024).

¹⁶ See, e.g., Google, '[Search Quality Rater Guidelines](#)' (Guidelines, 5 March 2024) 87.

¹⁷ See Google, [Submission to the Australian Competition and Consumer Commission](#), *Digital Platform Services Inquiry No. 9* (3 May 2024) section 3.1.

¹⁸ Special Broadcasting Service, [Submission to the Australian Competition and Consumer Commission](#), *Digital Platform Services Inquiry No. 9* (22 April 2024).

¹⁹ '[How Results Are Automatically Generated](#)', *Google Search* (Web Page).

SBS itself acknowledges that Microsoft also ranks YouTube content above the SBS affiliate's content in Bing search results for the same query.

Similarly, Google's recently-announced partnership with Reddit does not in any way provide for Reddit content to be ranked higher in the Search rankings. None of our partners receive preferential treatment in Search's rankings - this is at the heart of our Honest Results policy, whereby we don't give Google partners or advertisers more favourable treatment in our unpaid search results.²⁰ As set out above, Google is always striving to improve Search and the feedback we've received has shown that people often want to hear about other users' experiences with a given topic. The updates that Google made to its search ranking systems in March 2024 have enabled Google Search to detect and surface high quality user discussion and forum content from hundreds of different forums and communities across the web. Where relevant and helpful to a search query, Google will surface and present such high quality user generated forum content in response to that query, including from Reddit. However, there is no connection between Google's partnership with Reddit and Search's rankings of Reddit results.

C. Google does not preferentially rank Google Flights or Google Hotels

Similarly, some stakeholders have asserted that Google preferences its own vertical search services, including Google Flights and Google Hotels, in the search results.²¹ We disagree with these claims.

The display of specialised features in Google Search that are designed to help satisfy a user's information needs is not "self-preferencing." Google has designed a variety of search features to provide useful information to users in rich and helpful formats as part of our mission to organise the world's information and make it universally accessible and useful. Based on Google's own internal testing and feedback from users, there are identified circumstances where users prefer search results to provide answers to their query as opposed to links to web pages where the user must further search for the information they are seeking. When Google identifies this user intent, it aims to provide users with an answer at the top.

For example, when a user enters a query for flights, Google helps them find information about flight schedules, pricing, and availability in a useful format. Google provides contextual information to help users reach the results they are looking for. Users are also presented with various booking options, ranked based on quality and relevance, provided by airlines and online travel agents where clicking through takes the users to their websites.

²⁰ ['Why We Sell Advertising, Not Search Results'](#), Google (Web Page).

²¹ See, e.g., Asia Travel Technology Industry Association, [Submission to the Australian Competition and Consumer Commission](#), *Digital Platform Services Inquiry No. 9* (26 April 2024).

Similarly, when a user enters a query for hotels, Google helps them find information about hotel locations, reviews, pricing, and availability in a useful format. As above, Google provides this contextual information to help users reach the results they are looking for. Users interested in booking a hotel room are then presented with booking options from hotels and online travel agencies where clicking through takes the users to their websites.

Google has made substantial engineering investments in building these features so that users have easy access to a broad range of high-quality, up-to-date information about flights and hotels.

The information that Google displays for flights is not monetised. All booking links displayed in the flights unit are unpaid; there is no payment to Google to display these links, and Google is not compensated when users click on them.²² For hotels, Google provides both paid and unpaid booking links; third party specialised vertical providers can appear in either.²³

Google provides multiple ways for users to find online travel agencies and travel metasearch companies in the search results where users indicate an intent to book a flight or hotel.

In all cases, Google's Search algorithms display results that best meet a user's specific needs. In making these determinations, Google does not preference any information source. We encourage the ACCC to robustly test submissions calling for outcomes that would prevent Google from showing specialised results in useful formats to users.

The evidence shows significant, consistent and continued investment in delivering high quality competitive search services

Finally, we briefly respond to a number of assertions that the quality of Google Search has declined over time. These assertions in effect reflect disparate, isolated and anecdotal individual experiences. No serious evidence is provided to indicate a decline in search quality.

The main argument advanced for a supposed degradation in search quality relates to labelling of ads.²⁴ These claims are factually incorrect, insofar as they relate to our labelling practices. Our Issues Paper submission provides further information about our approach to ads, which is

²² Google, '[How to Find the Best Fares with Google Flights](#)', *Travel Help* (Web Page, 2024).

²³ Google, '[How Travelers Find Hotel Booking Links](#)', *Hotel Center Help* (Web Page, 2024).

²⁴ See e.g., Barka Parka, [Submission to the Australian Competition and Consumer Commission, Digital Platform Services Inquiry No. 9](#) (May 2024); Special Broadcasting Service, [Submission to the Australian Competition and Consumer Commission, Digital Platform Services Inquiry No. 9](#) (May 2024); Consumer Policy Research Centre, [Submission to the Australian Competition and Consumer Commission, Digital Platform Services Inquiry No. 9](#) (17 April 2024); Man of Many, [Submission to the Australian Competition and Consumer Commission, Digital Platform Services Inquiry No. 9](#) (25 March 2024).

consistent with our overarching goal to provide users with the most relevant information to help them find what they are searching for.²⁵

The anecdotal experiences shared in these third party submissions stand in contrast to the tens of billions of queries that are handled by Google Search each year in Australia alone. Search quality is not, and cannot be, defined by anecdotal examples of whether a specific search query meets the particular requirements of a given individual user, or promotes the content of a specific provider in the way that they would want.

Evidence that we have provided in the course of our engagement with the ACCC shows that Google is highly focussed on driving improvements in search quality across the trillions of queries it receives worldwide each year and continuously invests significant resources to do so.²⁶ We have been (and continue to be) the first to pioneer new innovations that incrementally improve the relevance and helpfulness of results in response to queries.²⁷ Australian consumers and businesses directly benefit from our relentless approach to investing in the development of new, improved and innovative ways to discover information.

As we explained in our Issues Paper submission, we view search as a never ‘solved’ problem. Rapid technological developments continuously drive changes to users’ expectations of search quality. Against this backdrop, we are constantly investing and innovating to ensure Google Search can remain relevant and useful to users.²⁸

We are not closed to feedback. We continuously assess, update and improve our Search ranking systems, including to adapt and respond to the ongoing evolution of the web based on feedback we receive from users and website developers. We make several thousands of updates to Google Search every year, each one of which follows a rigorous testing process involving extensive user research, including tens of thousands of live experiments and Search quality tests, to empirically assess whether these changes provide more useful results to users.

The results are clear: our continued efforts in investing and improving Google Search is the reason Australians continue to prefer our search service. Google remains the search engine of

²⁵ See Google, [Submission to the Australian Competition and Consumer Commission](#), *Digital Platform Services Inquiry No. 9* (3 May 2024) section 3.3.

²⁶ See Google, [Submission to the Australian Competition and Consumer Commission](#), *Digital Platform Services Inquiry No. 9* (3 May 2024) section 3.1 and 3.2; Google, [Response to the ACCC’s Discussion Paper](#), *Digital Platform Services Inquiry No. 5* (8 April 2022). In Annex Q.1.2 (and specifically page 67) of this submission, we provided a chronology of innovations in Google Search between 2005 and 2022. We have updated this diagram to include the recent innovations to algorithms, crawling and indexing in Google Search which are detailed in our submission to the ACCC dated 3 May 2024 (see **Annexure 1**).

²⁷ See Google, [Submission to the Australian Competition and Consumer Commission](#), *Digital Platform Services Inquiry No. 9* (3 May 2024) section 3.1.

²⁸ See Google, [Submission to the Australian Competition and Consumer Commission](#), *Digital Platform Services Inquiry No. 9* (3 May 2024) section 3.1.

choice for Australian consumers, as demonstrated by Google’s overwhelming popularity on Windows devices in Australia. Microsoft pre-installs its Edge browser that defaults to Bing on Windows devices. Notwithstanding that, as set out in our Issues Paper submission, Google’s share of general search engine queries on desktops is around 86% while Bing’s is 10%.²⁹

We don’t believe any third party submission has provided, or could provide, compelling or cogent evidence to demonstrate that Google does not consistently invest to maintain and improve search quality. There is also no suggestion from any third party that there is a higher quality search engine than Google Search.

Conclusion

Google appreciates the opportunity to share our insights on third party submissions for the ACCC’s September 2024 Report. We support the importance of the ACCC critically and independently assessing the relevance and cogency of various stakeholders’ claims. We reiterate that if the ACCC proposes to include findings in this report based on anecdotal or isolated claims, that we be consulted and given an opportunity to respond. We would be pleased to discuss any of these matters further.

²⁹ See Google, [Submission to the Australian Competition and Consumer Commission](#), *Digital Platform Services Inquiry No. 9* (3 May 2024) 23.

Annexure 1 - Snapshot of Significant Innovations in Google Search’s algorithm, crawling technology and indexing technology

