

MANOFMANY

Man of Many

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SUMMARY INTRODUCTION

Man of Many is Australia's preeminent men's lifestyle site and the nation's first 100% Carbon-Neutral digital publisher, championing the latest products, culture, and style. Search engines, notably Google, are pivotal to our business, driving 80% of our traffic. The visibility and accessibility provided by search engines are integral to sustaining our business model, ensuring that high-quality content reaches our audience. We recognise Google's dominant position in the search market and appreciate its active participation in supporting publishers in Australia through initiatives like the Google News Initiative and various funding opportunities.

In responding to the competitive landscape of general search services in Australia, it is crucial to consider measures that ensure traffic continues to flow to publishers like Man of Many. Such measures would support the sustainability of business models reliant on search traffic. We advocate for a balanced approach that acknowledges Google's market dominance while highlighting its constructive role in supporting the publishing industry in Australia.

The evolving dynamics of the search services market, characterised by the integration of generative AI and the shifting patterns of information discovery, underscore the need for regulatory insight and intervention that fosters a healthy, competitive environment. Ensuring diversity in the search services market, facilitating equitable traffic distribution, and maintaining a fair and transparent ecosystem are essential steps towards sustaining the vibrancy and viability of digital publishers in Australia.

In conclusion, as we navigate the complexities of the digital search landscape, regulatory bodies, industry stakeholders, and digital publishers must collaborate to foster a competitive environment that benefits consumers, promotes diversity, and supports the sustainable growth of the digital publishing sector. Man of Many remains committed to engaging in this dialogue, advocating for practices and policies that ensure our continued ability to deliver exceptional content to our audience.

About Man of Many:

Man of Many is Australia's largest men's lifestyle site and its first 100% Carbon-Neutral digital publisher, featuring the latest in products, culture, and style. We're not just the leading voice in Australia's men's lifestyle domain; we're a beacon of empowerment, guiding over 2 million monthly global readers and 750,000 social followers toward positive investments in themselves and their communities. Our commitment to authenticity makes us the trusted voice for Australians, and our recent accolades reflect our impact and influence in the industry.



- Australian Communications and Media Authority (ACMA) – Registered News Business
- WINNER: Media Platform of the Year - B&T Awards 2023
- WINNER: Website of the Year - Mumbrella Publish Awards 2023
- WINNER: Publish Leaders of the Year - Mumbrella Publish Awards 2023
- WINNER: Best Engagement Strategy - Mumbrella Publish Awards 2023
- Australian Press Council Member
- 100% Carbon Neutral Climate Active Certified Organization
- Digital Publishers Alliance Founding Member
- Online News Association Member
- AUDIENCE: Over 2 million readers visit Man of Many's website each month

Man of Many has continuously excelled as an independent online authority, delivering the latest news, features, and expert insights on consumer products, technology, fashion, and pop culture. Our dedicated team drives the cultural conversation, offering a premium platform for editorially-driven commerce and news that resonates locally and globally.

Since our inception in 2012, we've maintained our self-funded and independent status, ensuring editorial impartiality and transparency. This commitment fortifies our position as a trusted voice and a tight-knit team that consistently delivers an exceptional experience to our readers and brand partners.

Man of Many is a platform and a trendsetter, shaping the cultural dialogue in the men's lifestyle arena. We've partnered with international brands like Nike, Samsung, Microsoft, IWC, Bose, and Netflix, showcasing our ability to effectively engage a savvy, style-driven audience. Our platform is a proven catalyst for impactful and engaging ad campaigns, offering a brand-safe and award-winning environment.

Critical Concerns for Man of Many

AI and LLM-Driven Content Concerns

- **Content Summarization Risks:** The advent of AI and LLMs poses a significant risk to Man of Many and similar publishers by summarising and potentially replacing original content. This could drastically reduce direct traffic to our site, affecting our revenue streams and business viability.
- **Misinformation Spread:** There's an inherent risk that AI, in its quest to generate engaging content, might amplify misinformation, thereby undermining the credibility and value of professional journalism that platforms like ours strive to uphold.
- **Fair Compensation:** AI's utilisation of our content for training purposes or within search results highlights the need for mechanisms that ensure publishers are fairly compensated for their intellectual property.

Dominant Search Engine Practices

- **Algorithm Prioritization:** The current practices of dominant search engines could disadvantage smaller publishers or those producing niche content due to algorithmic prioritisation, which often favours larger, established platforms.
- **Lack of Transparency:** The lack of transparency regarding how content is ranked and displayed on search engines raises concerns about potential biases and impedes our ability to adapt and optimise our content strategies effectively.



- **Platform Dependency:** Our dependence on a limited number of platforms for content discoverability restricts our reach and visibility, making it challenging to sustain and grow our audience base.

Fair Compensation and Intellectual Property

- **Copyright Protections:** There is a pressing need to strengthen copyright protections against the unauthorised use of content by AI technologies and search engines, ensuring that publishers retain control over their intellectual property.
- **Revenue-Sharing Models:** We advocate for the development and implementation of licensing agreements and revenue-sharing models that provide publishers with fair compensation for their content, thereby supporting the publishing industry's sustainability.

Media Diversity and Local Content Impact

- **Algorithmic Bias Toward High-Traffic Content:** Algorithms and AI's tendency to favour content that generates high traffic could sideline local journalism and niche publishers, leading to a decline in media diversity and the representation of diverse perspectives.

Data Privacy and User Tracking

- **User Data Collection Practices:** The increasing scrutiny of search engine practices regarding data collection and user tracking necessitates stricter regulations to protect user privacy and ensure ethical data handling.

Competition and Market Dynamics

- **Monopolistic Behaviors:** Concerns over the monopolistic behaviour of dominant platforms highlight the need for antitrust actions and strategies to promote a competitive market, encouraging innovation and providing opportunities for new entrants.

Additional Publisher Concerns

- **Adapting to Algorithm Changes:** The continuous evolution of search algorithms presents a significant challenge. It affects our visibility and requires constant adaptation to maintain our presence in search results.
- **Limited Control Over Content Display:** Publishers have limited control over how their content is displayed on search engines. This includes issues with inaccurate or misleading search result snippets, which can misrepresent the original content and affect user engagement.

As a bootstrapped publisher, Man of Many's sustainability hinges on attracting sustainable traffic to our site for our quality content. Collaborative engagement with Google and other platforms is crucial to ensure we are not inadvertently marginalised akin to the NMBC or the potential designation Meta faces in Australia. We seek constructive dialogues and regulatory interventions that acknowledge and address these concerns, supporting the continued vibrancy and diversity of the digital publishing ecosystem.

RESPONSE TO QUESTIONS:

Viable Alternatives to General Search Services

1. What types of digital platform services are viable alternatives to general search services?

The digital ecosystem rapidly expands, providing consumers with many avenues to seek information. Beyond traditional search engines like Google, we've observed an increasing reliance on AI chatbots and social media platforms. Services like OpenAI's ChatGPT, Google's Gemini, and Microsoft's Copilot have revolutionised how information is accessed, offering conversational, intuitive interactions. Additionally, platforms such as TikTok, Reddit, and Instagram are becoming significant discovery sources for a younger audience, often offering more curated and relevant content based on user behaviour and preferences.

The advent of these services marks a significant shift in information discovery, catering to the demand for instant, accurate, and easily digestible answers. Finding information is no longer merely about finding it but about how it aligns with users' immediate needs and contexts.

2. How are consumers using general search services or other services (including AI chatbots and social media) to find information?

Consumers are increasingly leveraging a blend of traditional search engines, AI chatbots, and social media to fulfil their information needs. Our internal analytics indicate a notable shift in traffic sources over the past year, with a growing percentage originating from social media platforms and direct interactions with AI-based tools. This trend indicates consumers' evolving preferences and desire for more engaged, interactive forms of information discovery.

For example, AI chatbots, which can understand and process natural language queries, offer a more interactive and personalized search experience. Similarly, social media platforms provide a rich, community-driven context for discovery, often tailored to users' interests and behaviours.

3. Do digital platform services other than search engines competitively constrain Google Search? If so, which services are available, and to what extent?

While Google remains the dominant player in the search engine market, the emergence of AI-driven chatbots and social media as information discovery tools presents a notable shift in the competitive landscape. These platforms offer distinct advantages, including personalisation, conversational interaction, and a community-focused approach to information sharing.

However, it's essential to recognise that these services also depend on major search engines' underlying algorithms and data. Google and its competitors' integration of AI into search processes signifies an ongoing evolution rather than a displacement of traditional search engines.

At Man of Many, our reliance on Google's search algorithms for traffic and visibility is tempered by the constant changes and 'moving the goalposts' these algorithms represent. While we acknowledge Google's significant support and opportunities, the unpredictability of search algorithm updates poses challenges for content creators and publishers aiming for consistent visibility and engagement.



In conclusion, as the digital landscape evolves, regulatory bodies and industry stakeholders must recognise the multifaceted nature of information discovery and the diverse platforms serving consumer needs. The competitive dynamics in the digital platform services market are increasingly complex, with AI and social media platforms playing pivotal roles alongside traditional search engines.

General Search Services in Australian

4. What is the level of competition for general search services in Australia, and what is the competitive effectiveness of the different search engines?

From Man of Many's vantage point, the landscape of general search services in Australia remains highly competitive, albeit with a clear leader in Google due to its substantial market power and widespread integration across devices and browsers. However, this dominance does not entirely eclipse the competitive effectiveness of other search engines, such as Bing and DuckDuckGo, especially within niche markets and among privacy-conscious users.

Our observation aligns with the evolving consumer behaviour, indicating a gradual yet noticeable shift towards alternative search methods and platforms, particularly among younger demographics. Platforms like TikTok and Instagram are emerging as significant discovery tools, challenging traditional search engines in the realms of immediacy and relatability. While these platforms don't replace the functional depth of search engines, they influence the competitive landscape by reshaping user expectations around content discovery and consumption.

5. Since September 2021, has the market for general search services in Australia experienced any material change in a) Market structure? b) Barriers to entry and expansion?

Since September 2021, the market structure of general search services in Australia has seen subtle shifts, primarily influenced by technological advancements and changes in consumer search behaviour. The introduction and rapid adoption of AI-driven tools and platforms, such as LLM chatbots, have begun to diversify how information is sought and consumed. This diversification represents an evolutionary step in the search market, suggesting a move towards a more varied ecosystem where traditional search engines and AI-driven platforms coexist and serve different user needs.

At Man of Many, we've observed these changes firsthand through our analytics and user engagement data, noting variations in traffic sources and engagement patterns that reflect broader trends in information discovery.

Barriers to entry and expansion in the general search services market have historically been high, primarily due to the substantial resources required to develop and maintain a competitive search engine. Google's entrenchment, bolstered by default browser settings and partnerships, adds another challenge for new entrants.

However, the rise of generative AI and chatbot technologies presents a novel pathway for emerging players to enter the search market without building a traditional search engine from the ground up. While these technologies offer a glimmer of hope for diversification, they also underscore the importance of access to vast datasets and advanced AI capabilities, potentially creating new barriers to entry centred around technology and data access rather than market access alone.

Moreover, constant Google algorithm updates present a moving target for content creators and publishers like Man of Many, requiring agility and adaptability in our content strategies. These "moving the goalposts"



contribute to a dynamic yet challenging environment for all market participants, emphasising the need for innovation and flexibility in addressing the evolving needs and behaviours of the Australian online audience.

In conclusion, while Google continues to dominate the general search services market in Australia, emerging technologies and platforms are beginning to influence the competitive landscape, offering alternative avenues for information discovery. For Man of Many, navigating these changes requires a balanced approach, leveraging Google's capabilities while adapting to new trends and technologies to connect with our audience effectively and to ensure we can drive traffic back to our site as a publisher.

Factors Affecting Competitive Landscape

As Australia's largest men's lifestyle site, Man of Many has experienced firsthand the dynamics of the digital search landscape, particularly how Google's dominance and the evolving digital ecosystem influence content accessibility and consumer behaviour. This submission reflects our insights and recommendations regarding the competitive landscape in general search services, focusing on the impacts of pre-installation agreements, potential regulatory measures, and data-sharing practices.

6. Has the impact of exclusive pre-installation and default agreements on competition in general search services changed over time?

The digital ecosystem's reliance on Google, propelled by exclusive pre-installation and default agreements, has not significantly changed. Instead, it has solidified Google's dominance in the search market. These agreements limit the visibility and viability of alternative search services, impacting the diversity of options available to Australian consumers and businesses. For publishers like Man of Many, this means navigating a landscape where visibility is heavily influenced by one entity's algorithms, often described as "moving the goalposts."

7. How effective would obligations on search engines prohibiting their exclusive pre-installation and default agreements be at addressing any competition issues in search? Which obligations would be more or less effective if applied in Australia?

Introducing obligations on search engines to prohibit exclusive pre-installation and default agreements could significantly enhance competition in the search services market. Choice screens, for instance, offer a promising avenue to empower consumers by giving them direct control over their search preferences. Effectively implementing such measures in the EU's Digital Markets Act would encourage diversity and innovation by levelling the playing field for all search service providers.

In the Australian context, mandating choice screens could break down barriers to entry, allowing new and existing players to compete more fairly. Additionally, requiring search engines to share non-sensitive click-and-query data with other market participants could foster innovation and improve service quality across the board. However, these obligations should be carefully designed to avoid unintended consequences, such as compromising user privacy or stifling technological advancements.

8. What are the most effective methods of sharing click-and-query data? How could the privacy and security risks associated with this sharing be mitigated?

Sharing click-and-query data, underpinned by strict privacy and security standards, could catalyse innovation in search technologies and improve user experience. One effective method would be establishing a secure, anonymised data-sharing framework to access aggregated search data without revealing individual user behaviours. Implementing robust encryption and access controls can mitigate privacy and security risks.



An independent body should oversee such a framework to ensure compliance with data protection regulations and maintain the integrity of the data-sharing process. This approach not only supports competition but also upholds users' fundamental rights to privacy and data protection.

The current dynamics within Australia's digital search landscape underscore the need for regulatory interventions that encourage competition, protect consumer interests, and foster innovation. By addressing exclusive pre-installation agreements and facilitating equitable data sharing, regulators can help create a more diverse and competitive market that benefits consumers and businesses.

Man of Many is committed to engaging constructively with regulators, industry stakeholders, and the broader community to realise these objectives.

Choice Screens

9. What elements of a choice screen would most effectively help users to overcome any potential default bias?

At Man of Many, we find the idea of choice screens, as they are currently conceived and implemented, to be less than ideal. The notion that they could help users overcome a default bias presupposes such a bias is detrimental. In reality, the overwhelming preference for Google among users isn't just about habit but quality. Google has proven to be the most efficient and reliable search engine, so people continue to use it by choice, not by default. Imposing choice screens disrupts this preference, not by promoting genuine competition but by introducing unnecessary friction for users who already know and prefer Google for their search needs.

10. Are there other consumer behavioural interventions that could complement choice screens in informing users about alternatives to default search engines?

Considering our stance on choice screens, exploring other, more meaningful interventions that could genuinely enhance consumer awareness about search engine alternatives without disrupting their experience is pertinent. Education and transparency about how search engines work, the data they collect, and how they impact privacy could empower users more effectively than choice screens. Providing users with easy access to information on how to switch search engines manually, if they wish to do so, respects user autonomy without imposing unwarranted decision points at setup.

11. How have consumers, general search services providers, and other market participants reacted to browser and search choice screens being rolled out in the European Economic Area from 6 March 2024 in response to the EU's DMA?

The introduction of choice screens in the European Economic Area, as a response to the EU's Digital Markets Act, has been met with mixed reactions. From Man of Many's perspective, the response underscores a critical viewpoint: while some users appreciate the visibility of alternatives, many continue to choose Google, affirming its standing as the preferred search engine. This choice is not made out of inertia but is a testament to Google's unmatched capability to deliver relevant, timely, and accurate search results. The lukewarm reaction to choice screens among consumers and industry participants suggests that while regulatory efforts to foster competition are well-intentioned, they may not address the underlying reasons for Google's market dominance—superior product quality and user satisfaction.

While Man of Many acknowledges the intent behind regulatory measures like choice screens to foster competition, we believe the approach overlooks the core reason for Google's dominance: it provides the best search experience. Users are savvy and capable of switching search engines should they find a better alternative. Thus, interventions should foster genuine innovation among competitors rather than imposing



artificial choices that might not resonate with user preferences. In the digital age, the best way to empower users is through education and transparency, allowing them to make informed choices based on their preferences and needs.

Other Measures to Help Improve Competition

12. How may search engines engage in anti-competitive self-preferencing? What are the potential harms to businesses, consumers, and other digital platform services from such conduct?

Addressing the concerns surrounding anti-competitive self-preferencing by search engines, especially Google, from the perspective of Man of Many—a platform that thrives on equitable search engine visibility—provides a unique vantage point on how these practices affect businesses, consumers, and the broader digital ecosystem.

Search engines may engage in anti-competitive self-preferencing by prioritising their own products, services, or subsidiaries in search results over those of competitors. This could manifest in various ways, including higher placement for their services, biased indexing, or even exclusion of competitor offerings from search results or related product sections.

It's instructive to consider the recent developments around Google's Search Generative Experience (SGE). This initiative marks a significant shift in how search results are presented to users, emphasising Google's generated responses over traditional search listings that direct users to external websites and publishers.

Google's Search Generative Experience: A Case Study:

Google's SGE represents an ambitious effort to integrate advanced AI and machine learning technologies directly into the search experience. By providing comprehensive answers and summaries directly on the search results page (SERP), Google aims to enhance user satisfaction by delivering immediate information. However, this approach has notable implications for content creators, publishers, and the competitive landscape.

One key concern is the relegation of traditional search results—links to external websites and publishers—further down the SERP. As Google prioritises its own generated responses, users may find less incentive to click through to external sites. This not only reduces traffic to these sites but also challenges the traditional ecosystem, where publishers could expect visibility in exchange for creating high-quality, relevant content.

- **Content Utilization and Credit Concerns:** Another critical issue is Google's use of publisher content to inform its own generated responses without adequately crediting the sources or directing traffic to them. While Google's algorithms crawl and index vast amounts of information from across the web, directly presenting this aggregated knowledge within SGE responses can obscure the original content creators. This practice raises questions about fair use, compensation, and the recognition of content creators' contributions to the knowledge ecosystem.
- **Potential Harms from Self-preferencing Conduct:** The implications of such self-preferencing practices are manifold:
 - **For Publishers:** Reduced visibility and traffic can directly impact advertising revenue and the ability to reach new audiences. Over time, this may discourage the production of high-quality content as the returns diminish.



- **For Consumers:** While immediate answers may improve the user experience in the short term, over-reliance on a single platform's curated responses could limit exposure to diverse perspectives and detailed analyses available on external sites.
- **For the Digital Ecosystem:** A concentration of power within a single platform that serves as both the gatekeeper and the primary content provider risks stifling competition and innovation among content creators and other search services.

In addressing the challenges posed by Google's Search Generative Experience and similar innovations, it's crucial to consider the balance between enhancing the search experience and preserving a vibrant, competitive ecosystem that rewards content creators and serves the broader interests of consumers. Regulatory measures, such as those proposed by the ACCC, aimed at ensuring fair treatment and visibility for all market participants, could play a pivotal role in maintaining this balance.

The potential harms of such conduct are multifaceted. For businesses, tiny and medium-sized enterprises (SMEs) like Man of Many, visibility can significantly be hindered, directly impacting traffic and revenue. On the other hand, consumers may receive a distorted view of available options, potentially leading to less informed choices and decreased access to various services. For the broader digital platform ecosystem, these practices can stifle innovation, as new entrants find it increasingly difficult to compete against entrenched players who leverage their dominance in search to promote their services.

13. How does anti-competitive self-preferencing affect the quality of search results displayed to consumers?

Self-preferencing can degrade the quality of search results for consumers by filtering the information they receive through a biased lens. Rather than presenting the most relevant or highest-quality content based on neutral algorithms, search engines might prioritise content that aligns with their interests. This not only undermines the trust users place in search engines to deliver unbiased information. Still, they can also lead to a homogenised internet where diverse voices and alternatives are sidelined in favour of mainstream or affiliated content.

14. To what extent would changes to Google Search results in the European Economic Area in response to the DMA address competition concerns relating to anti-competitive self-preferencing by search engines? Would a similar change be beneficial to competition in Australia?

The changes Google is testing in the European Economic Area (EEA) in response to the Digital Markets Act (DMA) could serve as a pivotal case study for similar measures in Australia. By removing certain self-preferencing features and introducing mechanisms to highlight a broader range of services, these adjustments aim to level the playing field for all market participants.

Implementing similar changes in Australia could significantly benefit competition. This would foster a more vibrant digital economy where consumers have access to a wider array of choices and businesses of all sizes can compete on equal footing. For platforms like Man of Many, this could enhance the opportunity to reach audiences without the overshadowing presence of search engines' own products and services.

Moreover, such regulatory actions could prompt a broader shift towards transparency and fairness in digital platforms' operations, encouraging innovation and ensuring that the digital market remains dynamic and competitive.

In conclusion, addressing anti-competitive self-preferencing is crucial for maintaining a healthy digital ecosystem that benefits consumers, promotes diversity, and supports economic growth through fair

competition. Experiences from the EEA's implementation of the DMA provide valuable insights that could guide similar initiatives in Australia, potentially transforming the digital landscape into one that rewards quality, innovation, and consumer choice above all.

The Increasing Role of Generative AI in Search

- 15.** To what extent do consumer-facing LLM-based chatbots currently compete with general search services?

Currently, consumer-facing LLM-based chatbots, such as ChatGPT, present an emerging competitive front to traditional search services, albeit in a complementary role rather than direct substitutes. These chatbots offer a conversational interface that can be more intuitive for certain queries, particularly those requiring context or nuanced explanation, which traditional search engines might not deliver as effectively. However, for Man of Many, which thrives on directing users to comprehensive articles and reviews, the primary competition remains with traditional search engines that directly influence website traffic and visibility.

- 16.** How has generative AI been integrated into search engine services so far? In terms of their utility and effectiveness in finding information for consumers, how do they compare with general search services?

Generative AI has been increasingly integrated into search engine services, most notably through features that summarise content or directly answer queries on the search results page. While these AI enhancements can significantly improve user experience by providing quick answers, they also pose challenges for publishers by potentially bypassing the need to click through to a content provider's site. From Man of Many's perspective, the utility of these AI-driven features for end-users is straightforward. Still, the impact on content creators and publishers hinges on how these technologies direct or divert traffic from original content sources.

- 17.** Have any noticeable trends emerged about consumers' preference for traditional search engine result pages versus AI-generated search results presented in a natural language format?

There's a growing trend of consumers appreciating the convenience offered by AI-generated search results, especially those presented in a conversational, natural language format. This preference is particularly evident among younger audiences accustomed to instant, interactive forms of communication. However, for a content-rich platform like Man of Many, it's crucial that these AI interfaces not only provide immediate answers but also guide users towards more profound engagement with original content, preserving the value exchange between publishers and readers.

- 18.** Will integrating generative AI into search engine services lead to new or additional monetisation strategies in general search services beyond an advertising-based model?

Integrating generative AI into search engines opens avenues for novel monetisation strategies beyond traditional advertising models. For publishers, this could mean opportunities for sponsored AI-generated content or premium AI-driven search services offering tailored content discovery. However, the evolution towards these new models requires careful navigation to ensure that monetisation doesn't undermine user trust or content quality.

- 19.** Have developments in generative AI affected the nature and terms of syndicated search agreements? To what extent do AI-powered search features rely on the syndicated data or search index of major general search service providers?

Developments in generative AI have the potential to redefine the nature of syndicated search agreements, particularly regarding how AI-powered features utilise and credit the syndicated data or content index. For Man of Many, the critical concern lies in ensuring that these agreements evolve to fairly compensate content creators for the value they provide, especially as search engines leverage this content to train AI models or generate AI-driven responses. The reliance on major search service providers' data and indexes must be balanced with equitable recognition and rewards for the content ecosystem feeding these AI innovations.

As the digital search landscape undergoes rapid transformation with the integration of generative AI, platforms like Man of Many must adapt to these changes while advocating for practices that ensure fair competition, proper content attribution, and innovative yet sustainable monetisation avenues. Generative AI has immense potential to enhance search experiences. Still, its full benefit can only be realised within an ecosystem that supports the mutual growth of both technology platforms and content creators.

What impact does generative AI have on the supply of general search services in Australia and markets outside Australia? In particular:

20. Is generative AI making it easier or harder to start supplying or expanding the supply of general search services? In particular:
- a. Do general search service providers with AI models or strategic partnerships with AI developers enjoy significant advantages over others in integrating generative AI into their search engine services?
 - b. What barriers do smaller and new providers face in integrating generative AI into their search engines?

In light of the rapidly evolving generative AI landscape, I'd like to share some perspectives on how this technology shapes the supply and competitive dynamics of general search services within Australia and internationally. These views are informed by discussions within the digital publishing sector, reflecting a blend of firsthand experiences and broader market observations.

Generative AI significantly advantages established search service providers, notably Google and Microsoft. Their strategic partnerships, robust computing infrastructure, and access to extensive datasets allow for sophisticated integration of generative AI into search functionalities. For example, Google's Search Generative Experience and Microsoft's integration of OpenAI's ChatGPT into Bing are testament to their leading edge. This disparity raises concerns about market consolidation and the increasing difficulty for new or smaller entities to compete.

The challenges for emerging and smaller search services are multifaceted. Beyond technological and financial hurdles, negotiating equitable terms for content utilisation—a critical component for training generative AI models—is notable. Experiences from platforms like DuckDuckGo and Neeva highlight these barriers, underscoring the necessity for collective bargaining solutions to facilitate fair compensation and access to AI technologies.

21. What is the role, if any, of click-and-query data in integrating generative AI into general search services? What impact has generative AI had on using click-and-query data to improve search algorithms?

The nuanced role of click-and-query data in generative AI underscores a complex interplay between content utilisation and compensation. While generative AI models do not directly "steal" content, they leverage the patterns within this data, benefiting from content creators' intellectual output without direct attribution or compensation. This situation points to the need for frameworks that recognise and reward the contributions of original content in training AI models.

- 22.** What other competition and consumer issues have emerged, or will likely emerge, from integrating generative AI into search engines?

Integrating generative AI into search engines presents several emerging issues, notably the potential for devaluing original content through unpaid use and the challenges of ensuring fair attribution. These concerns are magnified by the models' reliance on vast content datasets, necessitating a balanced approach to content rights and AI model training that respects the intellectual property of content creators.

- 23.** How easily can digital platform services integrate with generative AI and expand into providing general search? Would such expansion have any impact on competition among general search services?

The potential for broader integration of generative AI across digital platforms poses opportunities and challenges for the competitive landscape. While it could democratise search functionalities, enabling innovation and diversity, the success of such integration hinges on overcoming current barriers, including equitable compensation and partnership models for content creators. Establishing constructive dialogues with AI developers is crucial in navigating these challenges, ensuring that generative AI's benefits are equitably distributed across the digital ecosystem.

In conclusion, as generative AI continues to reshape the search service landscape, it is imperative to foster an environment that supports innovation while ensuring fair competition and respecting content creators' rights and contributions. The digital publishing sector's experiences and insights underscore the need for regulatory frameworks and industry practices that address these evolving challenges.

Search Quality

- 24.** How do consumers evaluate the quality of general search services? a) What features or aspects of quality do consumers value? b) Which aspects of quality identified above matter most to consumers choosing a search engine?

Consumers primarily evaluate the quality of general search services based on the relevance and accuracy of search results, ease of use, and speed at which information is delivered. Privacy concerns and the volume of advertising also play crucial roles in their evaluation. In today's rapidly evolving digital landscape, integrating generative AI into search services raises new considerations for these traditional search quality metrics.

Among these aspects, relevance of results, privacy, and minimal interference from advertising are typically the most valued by consumers. The expectation is not just to find information but to access it in a way that feels intuitive, respects user privacy, and minimises distraction or confusion caused by ads.

- 25.** Has the quality of organic search results improved, stagnated, or decreased over time? To what extent?

The quality of organic search results seems to have experienced both improvement and decline like generative AI promises enhanced relevance and comprehension in search responses. However, the proliferation of SEO-optimized, low-quality content and the difficulty in distinguishing between paid and organic results have contributed to a perceived stagnation or even degradation in the overall quality of search results.

- 26.** How do general search service providers evaluate the quality of general search services? What data do they need?

Search service providers evaluate the quality of their services using various data, including click-through rates, time spent on resulting pages, user feedback, and manual reviews by quality raters. Generative AI's role in this evaluation process is growing, and it has the potential to enhance understanding of user intent and satisfaction through advanced data analysis techniques.

27. How has the relationship between organic and paid search results changed over time?

Over time, the distinction between organic and paid search results has become increasingly blurred, with paid results often designed to closely mimic organic ones. This trend potentially confuses users and might prioritise advertiser interests over user needs for relevant, unbiased information.

28. To what extent have paid search results affected search result quality?

The increasing similarity in appearance between paid and organic search results has likely impacted the perceived quality of search services, with users possibly questioning the impartiality and trustworthiness of the information presented to them.

29. To what extent would AI-generated content and AI-powered search impact search quality and webpage quality?

AI-generated content and AI-powered search can significantly impact search quality and webpage quality by directly providing more relevant, comprehensive responses within search interfaces. However, there's a risk that such content might overshadow high-quality, original content from reputable sources, potentially reducing the diversity and richness of information available to users.

30. What other ways has search quality changed over time?

Search quality has evolved in multiple ways, including the sophistication of algorithms in understanding and predicting user intent, integrating multimedia results, and blending paid and organic results. The introduction of generative AI represents the latest significant shift, with the potential to enhance and complicate the search landscape. This emphasises the need for ongoing adaptation and scrutiny to preserve the integrity and value of search services.

In closing, as generative AI becomes more intertwined with search services, maintaining high-quality, trustworthy search results becomes more challenging and critical. Balancing innovation with the core principles of relevance, privacy, and transparency will be vital to ensuring that search engines continue to serve their users' best interests.

Competition and Its Effect on Search Quality

In light of the inquiry into the competition and consumer issues within Australia's general search services market, Man of Many wishes to offer insights into how the current state of competition impacts the quality of these services. Given our position within the digital publishing landscape, our observations and concerns stem from our direct experiences and the broader industry trends affecting publishers and content creators alike.

31. How has competition in Australia for general search services affected the quality of different search engines?

The dominance of a single player in Australia's search engine market has led to a stagnation in the quality of search results. The lack of significant competitive pressure allows major search engines to maintain the status quo, potentially deprioritising the need for quality enhancements in their search algorithms. This situation

could lead to a diminished user experience, where search results may not always represent the most relevant or high-quality content available.

32. What has been the impact of competition in Australia on general search service providers' incentives to improve search quality?

The competitive dynamics in Australia's search engine market significantly influence providers' incentives to improve search quality. With limited competition, major search engines might not feel compelled to innovate aggressively or address issues within their search algorithms promptly. This could result in slower responses to users' evolving needs and preferences, potentially affecting the overall user experience and satisfaction.

33. To what extent is the reported decline in the quality of search services a result of a general decline in the quality of web pages over time? Has this decline in quality been influenced by major search engine search result ranking policies or by other factors?

The reported decline in search service quality can be attributed to several factors beyond the general decline in webpage quality. Notably, the ranking policies of major search engines, which sometimes prioritise content optimised for search algorithms over genuinely informative and high-quality content, play a significant role. Additionally, the increase in AI-generated content, which often lacks the depth and accuracy of human-created content, contributes to the perceived decline in search quality. These factors combined underscore the complex challenges facing the delivery of high-quality search results to users.

34. To what extent do the barriers to consumers switching search engines impact the quality of general search services?

Barriers to switching search engines, such as the pre-installation of specific search engines on devices and the general user habituation to a specific search interface, significantly impact the quality of general search services. These barriers discourage users from exploring alternative search engines that offer superior search quality or different value propositions, ultimately reducing the competitive pressure on dominant search engines to improve their services.

35. What other factors affect search quality in Australia? To what extent have they affected search quality?

Several other factors affect search quality in Australia, including:

- The prevalence of SEO tactics can lead to the prioritisation of content designed to rank well over content intended to inform or engage readers genuinely.
- Users' increasing difficulty distinguishing between paid and organic search results can undermine trust in the search engine's ability to deliver unbiased information.
- The role of generative AI in shaping search results, which, while innovative, raises questions about the authenticity and reliability of the content being prioritised.

The need for a competitive landscape that encourages innovation and prioritises the user's search experience is more critical than ever. As Man of Many navigates these changing dynamics, we advocate for measures that support a diverse and competitive search engine market in Australia that incentivises improvements in search quality and ensures that users have access to accurate, reliable, and high-quality content.

Conclusion

In conclusion, as Man of Many navigates the complex and evolving digital landscape, it's evident that search engines, notably Google, are pivotal in disseminating and consuming digital content. Publishers' dependency on search engines to drive traffic to their platforms underscores the significant impact of search algorithms on the visibility and accessibility of high-quality content. Therefore, it's imperative for regulatory bodies like the ACCC to play a proactive role in ensuring that traffic continues to flow to publishers fairly and equitably.

Moreover, with the advent of generative AI technologies and their integration into search services, how content is utilised and presented on search result pages is transforming significantly. This evolution raises important considerations regarding search engines' fair use of publishers' content. As such, we strongly advocate for measures that ensure publishers are compensated fairly when their content contributes to search engine offerings' functionality, competitiveness, and richness.

The digital publishing ecosystem thrives on diversity, innovation, and fair competition principles. Ensuring that publishers are adequately rewarded for their contributions supports the sustainability of the publishing industry and enriches consumers' digital content landscape. It promotes a cycle of investment in high-quality content creation, fostering a more informed, engaged, and diverse digital community.

Therefore, we urge the ACCC to consider the following recommendations:

- **Implement Regulatory Measures to Promote Fair Traffic Distribution:** Encourage search engines to adopt practices that ensure users can quickly discover and access diverse content from various publishers. This includes scrutinising and addressing practices that may unfairly prioritise or disadvantage certain publishers.
- **Ensure Fair Compensation for Publishers:** Develop frameworks or guidelines that require search engines to fairly compensate publishers when utilising their content. This could involve exploring models for content licensing, revenue sharing, or other compensatory mechanisms, especially when content is directly integrated into search results or used to train AI models.
- **Foster Transparency and Dialogue:** Encourage ongoing dialogue between search engines, publishers, and regulatory bodies to address emerging challenges and opportunities in the digital ecosystem. Transparency in how search algorithms work and how content is valued can foster a more collaborative and mutually beneficial relationship between search engines and publishers.

Addressing these considerations can help the ACCC play a crucial role in ensuring a vibrant, competitive, and sustainable digital publishing ecosystem in Australia. Ensuring fair traffic distribution and compensation for publishers not only supports the publishing industry's economic viability but also promotes a rich and diverse digital content landscape for consumers.

Thank you for considering these urgent matters. Sincerely,



Scott Purcell
Co-founder & Director Man of Many



Frank Arthur
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