

Ms Morag Bond and Ms Kate Reader  
Digital Platforms Branch  
Australian Competition and Consumer Commission  
GPO Box 3131  
Canberra ACT 2601  
By e-mail [adtechinquiry@accc.gov.au](mailto:adtechinquiry@accc.gov.au)

5 March 2020

Dear Ms Reader and Ms Bond,

### **Digital advertising services (Ad Tech) inquiry – interim report**

The Special Broadcasting Service Corporation (**SBS**) appreciates the opportunity to comment on the Australian Competition and Consumer Commission's (**ACCC**) *Digital advertising services inquiry* (the **Inquiry**) – *interim report* (the **Interim Report**). SBS is a participant in the Ad Tech market as both a publisher and an advertiser.

SBS supports the objectives of the six proposals outlined in the Interim Report, which address three of four key issues of concern raised by SBS in its May 2020 [submission](#) to the Inquiry. In that submission, SBS stated that it would welcome measures which increase transparency of the operations of Ad Tech market intermediaries; address the imbalance of consumer data available to market participants; and, manage issues that can arise from vertical integration and self-preferencing practices.

SBS appreciates the opportunity to further address these issues in response to the Interim Report.

#### Concentration of market power

As noted in SBS's previous submission SBS would welcome additional measures that address vertical integration and the consequential concentration of market power, including arising from mergers and acquisitions in the technology sector.

In particular, Google has a long-standing history of preferencing its own technology in the Ad Tech ecosystem. It owns and has acquired a large number of platforms (including buy-side, sell-side, data, and server) in the market, enabling it to profit from a significant imbalance of market power. It is able to leverage one area of its business to strengthen another, including by internally sharing a significant amount of consumer data collected across its platforms and from other sources.

#### Transparency in the Ad Tech supply chain

SBS supports transparent and uniform reporting among supply-side platform (**SSPs**), demand-side platforms (**DSPs**), data management platforms (**DMPs**), and other market intermediaries. It is important for SBS, as a publisher, to have a clear understanding of the sale price (per advertisement impression) to the buyer, in comparison to the payment that SBS receives.

#### Changes to consumer data regulation

Any changes relating to consumer data and use should take into account consumers'

consent; and should apply uniformly to all publishers and platforms. However, SBS does not support measures that may result in 'consent fatigue' among consumers.

SBS supports introduction of data separation mechanisms, which would further support market competition.

Should you have any queries, or would like any further information, please do not hesitate to contact [REDACTED]

Sincerely,

[REDACTED]

James Taylor  
**Managing Director**