



ACCC SUBMISSION

DIGITAL ADVERTISING SERVICES INQUIRY
TIMOTHY WHITFIELD & DENISE SHRIVELL
APRIL 2020

* ECO-FRIENDLY NOTE: WHEN PRINTING, PLEASE SELECT GREYSCALE AND THE
BACKGROUND WILL NOT PRINT



Scope of ACCC Advertising Services Inquiry



- Ad-Tech Vendor Categories
- Ad-Tech Market Competitiveness & Efficiency
- Advertising Inventory Supply
- Accurate Buyer Information
- Programmatic Auctions (Bid Waterfalls)
- Roles & Responsibilities in Advertising Buying Process



Key Credentials

Timothy Whitfield

- 12 years as a CTO
- 5 years as Head of Technology for GroupM
- 5 years Agency Influencer of the Year award
- Leader in Ad-Tech in Australia



Denise Shrivell

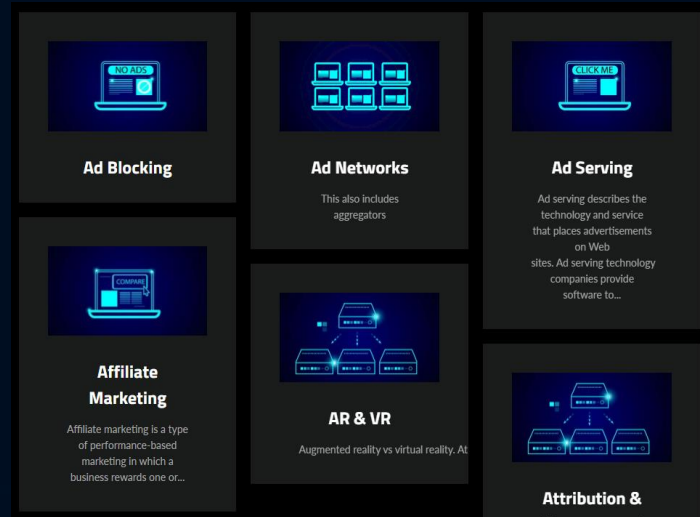
- 35 year industry veteran
- Creator of MediaScapes
- Special interest in Australia's media landscape & its impact on our democracy





Ad-tech Vendor Categories

- Over 30 known Ad-Tech vendor categories & growing with new features (e.g. Augmented Reality / Virtual Reality) but also contracting (e.g. Viewability is now standard in ad-servers).
- Ad-Tech vendor categories are ambiguous & confusing to consumers.



Note: Sample only. All ad-tech categories available on MediaScope 2.0 platform

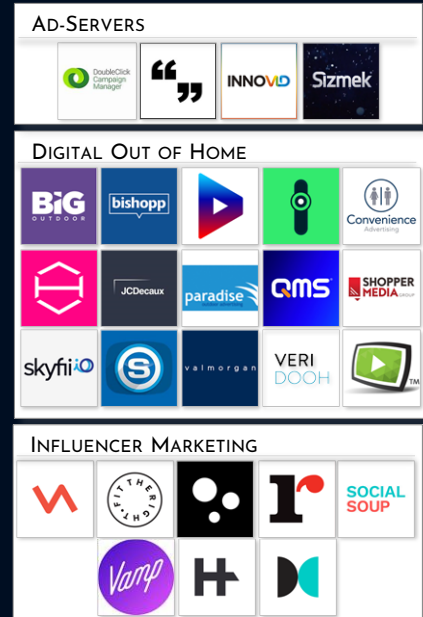
Suggestion: Clear definitions needed for each ad-tech category, benefit & explanation of how they work.



Ad-tech Vendor Categories

- Ad-Tech vendors self categorise (30 known categories) but it is hard for stakeholders to know which vendor does what.
- IAB (Interactive Advertising Bureau) have done a great job in some categories such as Ad-Serving to ensure minimum standards for being qualified as an ad-server.
- Opportunity for ACCC to create guidelines to help over Ad-tech vendors categorise. This would specifically help brands & advertisers differentiate DSPs

Suggestion: A free but dynamic resource should be created to list all ad-tech vendors in Australia.



Note: Sample only. All ad-tech vendors available on MediaScope 2.0 platform



Ad-tech Competitiveness & Efficiency

- Large Ad-tech platforms can offer great efficiency & therefore cost savings for agencies - but at the same time can limit competitiveness.
- Platforms like AWS DSP (Amazon Demand Side Platform) or Facebook are a closed eco-system from an Ad-tech perspective. However, platforms like Shopify, Google Display & Video 360 offer a very integrated experience.
- Brands & advertisers should be able to select the specific piece of Ad-tech that they want to use from each & every category - & build their own Ad-tech delivery stack.

Suggestion: At a minimum a 3rd party ad-server should be able to be used for any digital marketing campaign in Australia.



Advertising Inventory Supply

- Fewer dollars are being spent on publishing platforms which produce & distribute public interest journalism. More media dollars are being spent on large digital media platforms which don't produce public interest journalism.
- It is unclear the long term impact from miss information generated by platforms that collect advertising revenue from 'social journalism'.
- There is no current way to measure the correlation between advertising dollars vs news quality. Furthermore, there is no way to currently review media revenue versus political views.

Suggestion: Create a framework that measures the supply of inventory & media investment versus publishing platform.



Accurate Information for Media Buyers

- Each Ad-Tech vendor seems to have claims of being leaders in their field. Sometimes this leadership is measured in (a) amount of data, or (b) complexity of algorithm. However this creates confusion for the media buyer.
- It is difficult for consumers to identify key differences between ad-tech vendor "A" or "B" that operate in the same category.
- The IAB have done a great job in the Ad-Serving category with minimum standards for ad-serving. However, many other categories are unregulated.

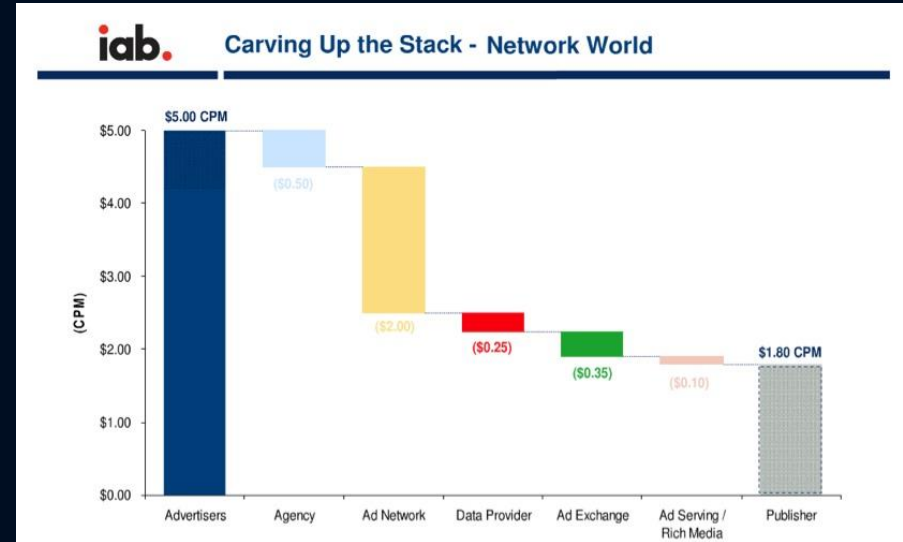
Suggestion: An independent website is needed to display all the ad-tech vendors in market and help identify the differences in each technology.



Programmatic Auctions (Bid Waterfall)

- Bid Waterfall statistics are at minimum 10 years old & produced in the US. As an example Ad Networks (shown in the image) no longer play such an important role
- Bid Waterfall analysis has never been accurately carried out in Australia therefore there is little to no transparency into revenue flow between Aust advertising buyers & publishers

Suggestion: A bid waterfall analysis should be conducted for the Australian market to scientifically quantify any potential inefficiencies & offer transparency into revenue flow.



Note: Terry Kawaja's May 2010 IAB Networks & Exchanges



Roles & Responsibilities in Ad Buying Process

- Roles & responsibilities across the digital advertising buying process are not well defined. These roles & responsibilities define how finances flow between advertising buyer & publisher. Clearer roles will help generate greater efficiencies.
- What is a Platform versus an Ad-Tech company? What responsibilities exist for each ad-tech company? How does an end user extract details of their personal information from each platform.
- What is a Media Agent (or buyer) & what auditing rights across the multi layers buying process does this give them?

Suggestion: A clear language framework to be established that defines rights & obligations to the advertiser but also the consumer.



Summary of Suggestions

- Mandate 3rd party ad-server for all digital marketing campaigns.
- Framework that measures the supply of inventory vs publisher content.
- An independent website to display unbiased ad-tech vendors in market.
- Clear definitions needed for each ad-tech category, benefit and explanation of how they work.
- Measure bid waterfall efficiency in market. Create framework for ongoing measurement.
- Clear language framework to define roles and responsibilities for each party.

Thank you for the opportunity to present this submission to this important inquiry

Both Tim & Denise are available to help the ACCC - as part of their Digital Services Inquiry - at anytime

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