

Hello all and especially Mrs. Maureen Ohlhausen, Acting Chairmen of the FTC and Mrs. Margrethe Vestager, EU Commissioner for Competition,

*Please for any comment send us an email to betterinternet@mail.com

THE TIME HAS COME TO STOP THE ABUSE!!!!

The most POWERFULL (and largest) advertising company in the world (GOOGLE) cannot be the entity to determine which ads will be presented online and which ads will be banned.

This must never happen!!!

Normal legal proceedings will last many years maybe even 10-15 years while thousands of companies worldwide are under the threat of closing their gates - WE MUST FILE FOR INJUNCTION RELIEF IMMEDIATELY!!!

We are a coalition that came together due to recent events occurring in the online advertising world, in order to facilitate fair and good conduct of business and in order to preserve the fairness and equality of the internet. We consider Google's latest announcement regarding the Chrome AdBlocker as a Line in the Sand that cannot be crossed.

Every few days we will send you more examples and explanations that will help you understand and prevent this injustice. We will back up our points with legal precedents and moral examples.

Argument #9: **The Authorities Responsibility is first of all to the Consumers!!**

Authorities have yet to grasp the final consequences of Google's native adblocker - Google's upcoming move will affect each product and service worldwide!! This is not a normal case limited to a single market or a single product!! Maybe you have forgotten the immense responsibility you have to the consumers but enough is enough.

Google's upcoming adblocker will inevitably create a world with only one advertising agency – Google. With offline advertising already declining, newspapers struggling for scrapes, the problem with one advertising agency is that everyday advertisers, such as plumbers, car dealerships, carpenters, insurance agencies and all the professionals we take for granted will pay more for advertising online. In order to survive they will have to raise their prices to the final consumer. What does this means - from now on, plumbing services will cost more, cars will cost more, furniture will cost more, insurance will cost more, Orange juice will cost more and so on. Some prices will go up by 10 cents and some will go up by 10

dollars, but every product and every service will cost more and consumers will not get any better products/services for these prices – it will only mean that Google is earning more money!!

Why do the authorities do nothing to stop this from happening you ask? – Well the answer is either one of the following or a combination of all three:

1. Authorities' officials eventually think about themselves and their next job in the business sector. They will not jeopardize it by opposing a giant.
2. They are on Google's payroll or looking to have their next job there.
3. They are dinosaurs, ancient relics that don't understand modern industries such as the online industry. They only know how to deal with traditional industries such: oil, automobiles, steel etc. In modern industries everything happens fast and the authorities are built for slow rides. They will eventually wake a few years from now if ever and will understand the huge mistake they are doing while all of us paying more for any product and service on earth.

Maybe we have forgotten the end results and the damage to the little people and little businesses. Like we already explained, every product and service on the planet will suffer a price increase which will affect global economy in an unprecedented way. Another massive impact is the one Publishers (content and news sites, services website, software developers) will suffer. Under Google's crushing power they will earn less money which will translate to low quality content, low quality information, low quality software and low quality tools for the rest of us.

So what do you think? Do you prefer that every product in the world will cost more enabling Google to earn a few more Billions each quarter? Do you prefer that the quality of all services and content will go down and down as advertisers and publishers struggle to stay alive? Or maybe the best move is keeping the power in the consumer hands, where they are free to download any independent adblocker they want or simply stay out of websites they believe have too aggressive advertising.

So please remember, we are directing this to you Mrs. Vestager or to any one in the EU and FTC, you have a crucial social responsibility to all consumers worldwide. Imagine for a second that doctors will stop caring about their patients for one day, or that judges will stop convicting murderers, do you think the people will feel safe? Do your job, stop this injustice!

But the simple truth is that, the biggest advertising company in the world can't be allowed to block its competitors!! Any simple minded would have understood this by now even without reading the amounts of information we are sending you every week. Do the right thing. Save the people.

Argument #8: **How to build control in one market using your power in another market 101**

You will need to pay attention to understand this one...

Google's algorithm is considered pretty complex but in its core it is very simple. If a website is relevant to a user's search and users keep coming back to it to consume its content it will get higher and higher rankings. For instance, if a specific website is ranked #3 on the first page of the results for a specific search term and users keep clicking on it instead of the first two results, in no time Google's algorithm will correct its position to #1, since a main factor in Google's search algorithm is users' engagement with a search result. (Not include shopping and other cases like this one when Google manipulate the search result for their benefit)

Since Google's desire is to rule the entire online advertising market one of their prime objectives (as we explained several times throughout our letter) is to block and drive out all ad types that used by potential competitors but not by Google itself. On January 2017 Google started ignoring users' wishes and the relevancy parameter of their algorithm in order to do just that. Websites that used full page advertising started to get penalties and getting lower rankings in mobile search regardless of the relevancy of their content and users' desire to visit these websites.

(<https://webmasters.googleblog.com/2016/08/helping-users-easily-access-content-on.html>)

Why did they do that you ask? Pretty simple. Much like they downgraded competing shopping comparison websites in order to get users to click only on Google's shopping comparison service, this time they downgraded websites that used competitors' ads so the users will click only on websites that has ads from Google AdSense. And that my friends, is how you use one market you control (the search engine market) to increase your control in another market (the advertising market).

Argument #7: **Final attempt to take over the world**

Google has only one growth engine, their advertising network, that's well known. They do have many exciting ideas and visionary projects (and the creation of Alphabet was a nice touch) but none of them will make any profit in the next few years. Companies like Amazon and others like it have several strong and diversified growth engines but Google has only one and the only way they can show growth in the near future is extend their advertising network. Realizing it, in the past year, Google made one decision that is now changing the balance of power on even a larger scale.

If we take all the ad types in the world we can divide them into 2 groups, the ad types that Google use and the ad types Google doesn't use. Google already control the first group with no competition whatsoever. Google decision was very simple, they decided to divide the second group into another 2 groups. From now on, any ad type that was not used by them until now will either be blocked (so no publisher can use it without facing a penalty) or it will be adopted into Google's arsenal to offer to their publishers. The end result for both groups is the same – Killing the competition and grow Google's advertising network to the max.

<u>Ad Type</u>	<u>Status</u>
*Banners ads	In Google's arsenal

Text ads	In Google's arsenal
Pre roll video ads	In Google's arsenal
video ads	In Google's arsenal
Native ads	Launched in July 2017
Incentive ads	started testing in 2017
Pop-under ads	Blocked July 2017
Pop-up ads	Will be blocked starting Jan 2018
Auto-Playing video ads	Will be blocked starting Jan 2018
Prestitial ads with Countdown	Will be blocked starting Jan 2018
Mobile Prestitial ads	Will be blocked starting Jan 2018
Large Sticky ads	Will be blocked starting Jan 2018

*Banner ads come in all sizes and shapes including Image banners, Rich media banners, Flash banners, Animated image banners and many more.

Argument #6: **IS THE FTC/EU COMPETITION COMMISSION ON GOOGLE'S PAYROLL?**

Not only that the antitrust authorities did not stop Google's planned Adblocker, but their complete apathy regarding the move has actually gave Google the support they needed to make even more aggressive moves against their competitors.

Imagine yourself that a couple of decades ago Nike announcing that it will no longer allow Walmart or other stores sell its products if they will also sell AND1 products. Will AND1 be able to grow into the competitive it is now to Nike in the Basketball shoes market?!

Well guess what... Google just did exactly that...

A week ago Google issued a clarification that it will no longer allow competition in the online advertising industry (<https://adsense.googleblog.com/2017/07/clarification-around-pop-unders.html>). Google keeps escalating its anti-competition moves, since the Adblocker announcement made a couple of months ago, AND THE AUTHORITIES ARE SILENT!!! Google now targets worldwide publishers working with full page advertising methods clarifying that Google will prevent these publishers from using its AdSense platform as long as they are using full page advertising!!!

Google is doing so pretending to care for user's experience, while all they care about, and cared about the entire time, IS GROWING THEIR PROFIT by all means!!! Including killing the competition!

The authorities must prevent Google from using its control in the browsers market to strengthen its (almost total) control in the advertising market!!!

Argument #5: **ONE "HARMLESS" OFFENSIVE ACT COULD END UP WITH WW2 – JUST ASK CZECHOSLOVAKIA!!!**

It was August 2016 when Google, without any special attention from the antitrust authorities, declared that starting January 2017 it will PUNISH publishers that use full page advertising on their mobile sites (such as interstitial – “surprisingly” not offered by Google). This “harmless” declaration should have raised some eyebrows in the competition authorities around the world as it was already clear, even to the untrained eye, that this declaration was a part of a bigger scheme. Imagine this, tomorrow Google will announce all websites with content recommendation ads receive lower ranking in the search results – all major news websites will suffer and a couple of Billion dollar companies (Taboola and Outbrain) will receive a death blow.

In 1938 Germany annexed some territories from Czechoslovakia in a so called harmless move. There was no intervention and/or resistant from the western allies as they believed Germany will stop there, but we all know how this case ended up. In the Google frontier we might not see physical occupation of territories or death to human beings BUT IT IS THE BEGINNING OF THE END OF FAIR COMPETITION IN THE ONLINE WORLD!

Google continues its master plan to kill competition and rule the market. This master plan is comprised out of many “harmless” steps such as the one mentioned above. We have already seen Google try to drive out competitors from the browser market by using its force in the email market – pushing IE and FF users of its Gmail service to switch browsers to Google Chrome by offering them “better functionality”. Another example, from the past couple of weeks’ headlines, is Google’s unfair manipulation of search results meant to harm competition in the shopping comparison market. These examples and many more just like it as well as the Czechoslovakian Annexation should have been stopped by all means from the beginning by anyone who can!!!!

GOOGLE HAS TO BE STOPED!!! - Injunction Relief has to be taken not wait for a legal procedure!

Argument #4: **GOOGLE’S MARKET SHARE IN THE SEARCH, ADVERTISING AND BROWSER MARKET**

ADVERTISING MARKET: According to Google its share in the US advertising market is 50% (apx) but *de-facto* the \$90 billion market split in to two sub-markets: Direct Advertising and Advertising through networks. In direct advertising the advertiser itself or an agency on its behalf are buying advertising space directly from publishers. Advertising through networks is advertising through Google or alike. In the networks advertising Google holds more than 80% of the market share and almost never allows competitors to enter the market. one of the only option for networks to enter the market is by using ad types/content different from Google’s – what Google is about to block soon enough through its adblocker. ONCE DOING SO, GOOGLE WILL CONTROL OVER THAN 90% OF THE NETWORKS MARKET IN THE US!!!

BROWSER MARKET: Recently, there were many press publications that stated that Google holds “only” 50% market share in the Browser Market (which should be enough in this case to stop them) so competing advertising companies will still be able to compete with Google working on other browsers

such as IE and FF – a point of view according to which there is no significant harm to competition in Google moves and position.

A different perspective, from the point of view of an advertising company, focus on desktop games sites. On those sites chrome market share is much higher than 50% due to the fact that IE users (the main competitor for chrome) tend to include very limited scope of user types – elderly, work related users, government offices and similar. Another point of view may point the Geo segmentation of the market – for example, Google chrome's market share in different geos is above 80%. Hence we should examine Google's market share as for its control in each and every sub-market (by mobile/desktop, demographics, geos, site verticals etc.) and generally in the browser's market.

SEARCH ENGINE: Even in the search engine market Google is manipulating the numbers in order to create a false impression about the actual market share it holds. For example: Google has a collaboration agreement with Ask.com that reduces Google's market share for the sake of appearance in the USA but in reality Google's market share is much larger as due to the agreement it is actually Google's results behind Ask.com's. also here if you divided it by segments in many case google control over 80% of the market.

Argument #3: **Google Plan to block future Competition**

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Even a \$20 Billion fine will still be worth it for Google. In a short time after releasing its Adblocker, Google's potential competitors will suffer a mortal hit – how much it is worth for Google to wipeout today all competition for the next decade?!!

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Any real competition will only emerge from companies that specialize in ad types that are not used by Google. Even then, only after building its control in its own field of business and gaining enough impact in it (a process that will probably take many years) such companies will be able to enter Google's ad types and compete with it.

Once the FTC will allow Google to block formats not used by it, the outcome will be - zero competitors for Google within 5-10 years. If we will let things develop according to Google's plan, every new company that will try its luck in the online advertising industry will have to comply to Google's ad formats and will stand no chance from the get go.

Thousands of companies (probably more) are about to take a strong hit or even go out of business if this play will be allowed. Here are some examples for strong companies that might be effected from Google's approaching attack, and if not they will be the target of Google's next blitz.

Here are some examples for potential competitors of Google that might take a massive hit in the immediate future and if not now that in the near future of Google adblock plan:

Just Premium (<http://justpremium.com/>) – A strong company that specialize in floating banners, some of them are in the format of "Sticky Ads". According to Google "sticky ads" will be blocked – and Just Premium will be affected.

Undertone (<http://www.undertone.com/>) – a premium company that use the format of "Full Page Ads". Some of the "Full Page Ads" formats will be blocked – Undertone will be affected.

Outbrain/Taboola (<http://www.outbrain.com/> / <https://www.taboola.com/>) – 2 mega companies that created a new advertising niche of ads based on content and not products/services. These ads are visually similar to Google's formats but are unique in the content provided therein. As for now Google did not forbid these kind of ads but what will prevent them from blocking content based ads in their next step on the way to world domination.

Argument #2: The silence of Big Publishers against Google

One major issue is this, the biggest and most powerful publishers in the world, such as CNN, Forbes and others like them, are mostly based on online advertising for revenue and most of their earnings are from Google advertising network. Google is well-known for its aggressive nature, which explains why the big publishers prefer not to take a firm stand against them and why we don't see any critical articles in the major news publishers against this move.

We understand the publishers hesitation, we really do. Going against a giant is a frightening step many publishers still don't fully understand the damage of Google's near future steps. At FIRST STEP Google might only block several ad formats or methods – at this step, maybe not all publishers will be damaged. But in the SECOND STEP Google will continue to add more and more competing advertising methods to the ad blocking blacklist and only then all publishers will feel Google's wrath. The THIRD STEP will be deadly for the industry as Google will have no competition, Google will cut publisher's share to the minimum and will keep all of industry profits to itself.

Worldwide antitrust authorities sometimes has difficult cases to examine – this is not one of them - THE BIGGEST ADVERTISING COMPANY IN THE WORLD CANNOT BE ALLOWED TO DECIDE WHICH ADS WILL BE BANNED AND WHICH WILL NOT!!!

Argument #1: Video prestitial (Youtube) = YES; Other prestitial = NO

Google say they will block, as defined by the Coalition for Better Ads, “prestitial ads with countdown timers” in each ad platform other than video.

You probably wonder why not video?! Well, the answer is **YouTube**.

YouTube use video prestitial ads which are full page prestitial ads with countdown timers.

Obviously, YouTube, a subsidiary of Google, will not be blocked and Google did not make (or will in the future) any announcement that they will block these ads since. WHY?! Simply because they are one of their biggest earner and growth engine.

Not only that, even if Google will do the math and decide that it’s in their best interest to block YouTube’s “prestitial ads with countdown timers”, you can be sure that they will do that in order to also block the competition - that way or another it doesn’t change the most important argument – THE BIGGEST ADVERTISING COMPANY IN THE WORLD CANNOT BE ALLOWED TO DECIDE WHICH ADS WILL BE BANNED AND WHICH WILL NOT!!!

You are receiving this email since you are a part of a group comprised of antitrust law enforcement officials, leading world newspapers, tech blogs, Adblock companies and top tier antitrust law firms.

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EU AntiTrust Commission

Brazilian Competition Authority

Korea Fair Trade Commission

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