

**Responses to Questions 1, 4-25, 28-36, and 39-52 of the Autorité de la  
Concurrence's Request for Information dated 23 July 2019 Case No. 19/0030F**

This submission sets out Google's response to questions 1, 4-25, 28-36, and 39-52 of the Autorité de la Concurrence's **(FCA)** Request for Information relating to the online advertising sector dated 23 July 2019 **(RFI)**. The RFI requires Google to provide the responses to these questions by 23 September 2019. Responses to the remaining questions will be provided shortly.

As agreed with the Rapporteur, Mr Clément Chazelas, by email dated 11 September 2019, a French version of Google's response will follow by the end of the week commencing 23 September 2019.

Google's response and its annexes contain sensitive business secrets that should not be disclosed to third parties. Pursuant to Article R463-13 of the Code de Commerce, Google will formulate a request for this purpose and provide a non-confidential version of its responses.

Google does not endorse or validate the content, findings or views expressed in any third party materials, reports or studies referred to in this response.

We hope our responses are helpful. Please let us know if you have any questions.

**PTX1092**

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been a first price auction, it will not be affected by the migration of AdX to a first-price auction.

**Q22. Please send the Group's response to the previous request in the event where the publisher has not activated the *Exchange Bidding* function.**

77. While Exchange Bidding has always involved a unified first price auction, Google is migrating to a first price auction system more generally in AdX. When the migration is complete, all bids from AdX buyers will be treated as first-price bids. This means the buyer that wins the impression will pay the amount they bid into the auction.

78. The move to a first price auction reduces complexity and provides value to Google's partners (with increased opportunities to maximise yield/revenue). It creates a fairer process. All demand sources (including Header Bidding line items) will compete for ad inventory under the same rules. It also increases transparency for advertisers and publishers. All Ad Manager partners will be required to share and receive bid data that allows Google to produce more granular reports. Finally, this change will align with broader industry practice - most other auctions are already partially or entirely first price.

**Q23. In the event where a DFP user chooses to change the ad server solution and opts for a competitor's offer, please specify:**

(i) if this publisher would still be able to access the request inserted in AdX;  
and, if yes,

(ii) if this publisher would continue to access this request under the same conditions as those of DFP in terms of quality or quantity. In particular, please specify if this publisher would still be able to interact in real-time with AdX in conditions similar to DFP.

**If applicable, please identify your response during the targeted period.**

79. As explained in response to question 1, publishers are not required to use both Ad Manager's ad serving and ad exchange features. Publishers therefore frequently mix-and-match Google products with third party tools to manage most efficiently the sale of their inventory to buyers. Any third party ad server can be used in combination with AdX, subject to the limitations described in detail in response to question 15 above.

**Q24. Please indicate the types of data collected by the Group through technologies integrated by the publishers on their**