From:	Eva Ljungbert
Sent:	Fri, 5 Nov 2021 14:39:04 +0100
To:	N Registrator
Subject:	FW: DMA meeting request: amendments to impact Google search domination
Categories:	PK

Från: Aurelien Maehl <amaehl@duckduckgo.com>
Skickat: den 6 juli 2021 18:43
Till: Eva Ljungbert <eva.ljungbert@regeringskansliet.se>
Kopia: Marcus Boklund <marcus.boklund@regeringskansliet.se>
Ämne: FW: DMA meeting request: amendments to impact Google search domination

Dear Ms Ljungbert,

Please find below a meeting request & our views on the DMA, which Marcus Boklund in cc has suggested that I forward to you.

I am happy to set up a meeting on August 17, 18 or 19 in the afternoon – or the week after.

Kind regards,

Aurélien Mähl
DuckDuckGo

From: Marcus Boklund <marcus.boklund@regeringskansliet.se>
Sent: Tuesday, 6 July 2021 17:23
To: Aurelien Maehl <amaehl@duckduckgo.com>
Cc: Lena Carlsson <lena.carlsson@regeringskansliet.se>
Subject: Sv: DMA meeting request: amendments to impact Google search domination

Dear Aurelien,

Thanks for sharing your position on the DMA. We would welcome a meeting. The earliest we could set this up would be from mid-August onwards, Ms Eva Ljungbert, who is in charge of the file at the Ministry of Enterprise, informs me. You can contact her directly.

Best regards,
Marcus

Från: Aurelien Maehl <amaehl@duckduckgo.com>
Skickat: den 6 juli 2021 15:55
Till: Marcus Boklund <marcus.boklund@regeringskansliet.se>; Pia Högset <pia.hogset@regeringskansliet.se>
Ämne: DMA meeting request: amendments to impact Google search domination

Dear Mr Boklund, Dear Ms Hogset,

I represent the Internet privacy company and search engine DuckDuckGo. We have a first-hand experience of the exclusionary practices put in place by Google and have been writing extensively about search competition, in particular following the 2018 Android decision, here: https://spreadprivacy.com/tag/preference/

Last month, Google announced a half-measure to improve the EU Android search default. Google's effort still falls far short - see our reaction here and more details on Techcrunch — and doesn't even reach other critical Google defaults such as on the Chrome desktop browser or Apple devices. In DuckDuckGo's position on the Digital Markets Act (here the annex with our amendments compared to the Commission's proposal), we propose a way forward to end Google's unfair practices in the search engine market:

- Prohibit gatekeepers from securing and establishing defaults for their search engine across the search access points of a gatekeeping operating system.
- Facilitate the switching of default settings. For instance, users should be able to change all of their device's search defaults at once when downloading a new search app.

Below are our two most important amendments**. Are you available in the next couple of weeks for a virtual meeting on the DMA?**

Best regards,
Aurélien Mähl

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Link to DuckDuckGo's position on the DMA & *Link to Annex with our amendments compared to the Commission's proposal*

1. Add a new article 6.1(bb) in order to prevent search gatekeepers from securing or establishing default positions across the search access points of an operating system:
    - *(bb) refrain from securing or establishing default positions for the online search engines of the gatekeeper across the search access points of the operating systems owned by any gatekeeper.*

2. In a new recital after (46), indicate that the regulator should substitute these default positions with a preference menu that lets users choose their search default on their device:
    - *(46a) Securing or establishing defaults positions across the search access points of an operating system, such as the pre-installed browser or another, dominant browser, the home screen bar widget, or the voice assistant, can entrench the dominant position of an established online search engine and prevent contestability on the online search engine market. Even where users can change the default manually, they rarely do so, due to behavioral bias for inertia. In order to ensure contestability, end users should be able to select their preferred online search engine default through a preference menu when they set up their device. The preference menu should comprise the most popular online search engines on a given market, on the basis of objective criteria such as market share, and should be designed in a fair and non-discriminatory manner to ensure that end users are*

not nudged to select a particular provider. The preference menu should be effective, that is the end user's choice of a search engine default should immediately apply across the search access points of the operating system. End users must subsequently be able to access such preference menu after the device is set up, including through a prompt on another online search engine's website or software application.

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