

Juhan Lepassaar
Chef de Cabinet of Mr Andrus Ansip, Vice President European Commission
Cc : Kamila Kloc, Aare Järvan, [REDACTED]

24 April 2015

Re: Competition & Platforms

Dear Mr Lepassaar

I am writing on behalf of [FairSearch Europe](#) which fosters and defends competition in the digital economy. This position has made us an active participant in the European Commission's antitrust investigations of Google in relation to search and Android. These investigations are critically important in protecting competition on the merits in the affected online markets as they will help ensure that Google respects well-established European legal precedents and competition law principles with regard to dominant enterprises.

FairSearch Europe is a group of 12 European and US-parented companies active across the various search sectors, including travel, mobile phone manufacturers, software companies, search providers and online commerce. Our members are Finland's [Nokia](#), France's [Twenga](#), Poland's [Allegro](#), UK price comparison site, [Foundem](#), Brazil's BusCapé and US companies Expedia, TripAdvisor, Oracle, Microsoft, admarketplace.com, the Find and the Travel Tech Association.

FairSearch takes note of the Commission's intension to embark on further analysis regarding the impact of online platforms on our digital economy as set out in the soon to be released Digital Single Market Strategy. FairSearch looks forward to cooperating with the Commission on this initiative, and in that context respectfully suggests that the ongoing cases against Google are certain to establish new precedents to guide future policies.

We would like to stress the need for extreme caution in this endeavour and any subsequent move to regulate platforms and or the data they collect. Even defining platforms is a complex issue where any ill-considered or rapid step today to shape Europe's regulatory environment risks impeding our capacity to keep up with the rapid pace of digital change and undermining our global competitiveness.

Our involvement in the Google cases reflects FairSearch and its member companies' conviction that European anti-trust law is sufficiently robust to remedy Google's anti-competitive practices whether preferencing its own services, demoting others or illegally using the content of competitors, etc.

This in turn reflects our shared belief that existing competition law, properly enforced, provides companies room to innovate in a competitive environment, and that any additional regulation would need to be developed very carefully to ensure that it does not constrain the digital sector's ability to evolve to meet the fresh challenges of the next digital revolution.

We would be happy to further discuss our position with you in person as early as next week.

Yours sincerely

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[REDACTED] FairSearch Europe

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FSE Transparency Register: 329146212053-87