
Your information

In what capacity or on behalf of whom are you participating in this public consultation?

Digital platforms

Full name (of the individual or the represented institution)

Computer & Communications Industry Association

Do you wish to publish this name together with your response or do you prefer to keep it confidential (so that the answer will appear as anonymous)?

Public

Contact e-mail (remains confidential)

Brief explanation of the reasons for the specific interest of the individual's or the institution's interest in online advertising (max. 1,000 characters)

The Computer and Communications Industry Association (CCIA) welcomes the opportunity to submit comments to the Spanish Competition Authority's (CNMC) inquiry into online advertising.

CCIA represents large, medium, and small companies in the high technology products and services sectors, including computer hardware and software, electronic commerce, telecommunications, and Internet products and services.

CCIA's members are leading innovators of what some refer to as the 'digital economy' (bearing in mind that that whole economy is becoming digital). Many operate so-called multi-sided business models where it is often the advertising revenue generated on one side of the business that funds the innovations valued by consumers. Many advertising services offered by CCIA's members created benefits and efficiencies for both consumers and advertisers alike.

With which firms do you deal in this sector? (max. 1,000 characters)

As stated above, CCIA is a nonprofit trade association that represents large, medium, and small companies in the high technology products and services sectors, including computer hardware and software, electronic commerce, telecommunications, and Internet products and services.

Our members employ more than 750,000 workers and generate annual revenues in excess of \$540 billion. CCIA remains committed to protecting and advancing the interests of our members, the industry as a whole, as well as society's need to benefit from the positive

contributions that our industry, which encompasses the digital economy, can make. A complete list of CCIA's Members can be found here:
<http://www.ccianet.org/about/members/>

Do you want to publish this information (the one on the firms with which you deal) within your response or do you prefer to keep it confidential so that the response is made public without disclosing this information?

Public

Which undertakings would you consider to be the most important in the different segments: advertisers, digital platforms, intermediary agents, etc.? (max. 1,000 characters)

There are numerous stakeholders that play an important role in the advertising sector since the Internet has offered a plethora of new, digital advertising opportunities including to those actors that have previously operated solely offline. The advertising ecosystem has never been as dynamic as it is today with many online services (as well as offline channels) fiercely competing for advertisers' money, and Spain is no exception to this trend.

General Assessment

Developments in online advertising imply a net positive impact on competition and efficiency

5

Advertisers can reach final consumers at lower costs

5

Advertisers can reach its target consumer more effectively (targetability)

5

There is a wider variety of options to launch an advertising campaign

5

There is a wider variety of agents with which hiring advertising services

5

Should you wish to do so, further and additional comments can be provided (max. 4,000 characters)

For further details please refer to our full submission attached to this consultation.

Impact on consumers

Online advertising yields more advantages than disadvantages for final consumers

5

Online advertising is a more efficient way of providing advertising services

5

Greater efficiency in online advertising sector translates into lower prices and/or better quality of the final goods and services

5

Consumers are empowered with more and better information to make more appropriate decisions

5

Each consumer receives more tailored advertisements, more suited to his/her preferences or needs

5

Consumers receive more targeted promotions that translate into rebates and other benefits

5

The advantages of online advertising for consumers offset the possible costs driven by a loss of privacy or by the excess attention required

5

Should you wish to do so, further and additional comments can be provided (max. 4,000 characters)

For further details please refer to our full submission attached to this consultation.

Specific problems of competition

The online advertising sector presents specific competition issues

0

Access to data represents a barrier to entry of undertakings or to the growth of smaller ones

0

In this sector, there is a problem of excessive concentration on a few undertakings

0

Abrupt changes of terms of agreement by the main undertakings may occur in this sector

0

The vertical integration of platforms, which act as intermediaries while at the same time rent advertising space as content creators and service providers, implies disadvantageous conditions for advertisers, such as tying and bundling of services or discriminatory treatment

0

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For further details please refer to our full submission attached to this consultation.