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December 22, 2017

VIA EMAIL

Haidee Schwartz, Esq.
Acting Deputy Director, Bureau of Competition
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

Re: 2012 Voluntary Commitments

Dear Haidee:

I am writing regarding Google's 2012 voluntary commitments to the FTC, set forth in its December 27, 2012 letter to the FTC, which are set to expire on December 27, 2017.¹

The commitments cover two main areas. First, Google agreed to remove certain clauses from its AdWords API Terms and Conditions. Second, Google agreed to provide an opt-out mechanism for websites to opt out of the display of their crawled content on certain Google web pages linked to google.com in the United States on a domain-by-domain basis. We believe that these policies provide additional flexibility for developers and websites, and we will continue them as policies after the commitments expire. As part of our ongoing efforts to communicate with developers and websites, Google will make an announcement in a blog post and include on its support pages Google's continuation of its current practices regarding the AdWords API Terms and Conditions and the domain-by-domain opt-out.

Sincerely,

/s/ Michael J. Lawrence

Google LLC

cc: Ian Conner, Esq.
Barbara Blank, Esq.
Franklin Rubinstein, Esq.

¹ Letter from David Drummond to The Honorable Jon Leibowitz (Dec. 27, 2012), https://www.ftc.gov/system/files/documents/closing_letters/google-inc./130103googleletterchairmanleibowitz.pdf.