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San Francisco, CA 94110

August 14, 2018

Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue NW
Suite CC-5610 (Annex C)
Washington, DC 20580

Re: Competition and Consumer Protection in the 21st Century Hearing, Project Number P181201

I am the owner and founder of Firepie, a wood-fired pizza restaurant in San Francisco that delivers on demand in 15 minutes. A few weeks ago, I noticed that ads for a third-party delivery service had started appearing on my Google knowledge panel. That bothered me a lot. It turns out that these new ads are available exclusively to delivery services, such as GrubHub, E24, Uber Eats, and others. This practice is harming small businesses, especially those that offer their own delivery service as mine does. The FTC needs to take action on this.

Further, Google displays the customer reviews of these third-party services in our knowledge panel, rather than reviews from Firepie itself. This is an unfair business practice, and it is very disconcerting. Google is using its status as a reliable information source to push these services in the name of profit. I don't trust Google as much anymore as a result of that.

We pay for our own AdWords. We want to drive customers to our own order platform because it only costs us a three percent transaction fee, as opposed to paying 30 percent for the third-party services. The cost of the third-party services has a significant impact on our financial stability as a business, as well as the ability to raise money for additional funding. We have already lost revenue due to the presence of these outside services.

I did not realize that Google was selling advertising exclusively to third-party delivery services until recently. These Google ads injure us financially. This entire situation is detrimental to our business operations. The FTC needs to regulate Google to ensure that there is a fair playing field for all businesses.

Sincerely,

Rick Richman
Owner