

August 11, 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

Google is taking money away from me by selling ads in my knowledge panel to delivery services without my consent. This is impacting the business I spent three years building. My restaurant, The Handpulled Noodle, uses GrubHub for deliveries outside of our delivery area, but we have seen an increase in deliveries by third-party services that could be delivered in-house.

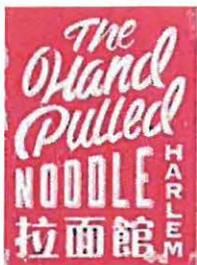
Seamless and GrubHub are the companies that I see most often in The Handpulled Noodle's knowledge panel. They are cycled, though, because different ones appear when you refresh the screen. My concern is obviously not about the services these companies offer because we do use them. But we use them by choice and only for deliveries outside our in-house delivery area. In the past, delivery orders had the customer's address on them, so we would verify they were not in our delivery area. If they were, we would include a note letting them know they could save money using in-house delivery. The delivery services then stopped including the addresses for us to see. So we now insist on verifying the customer name and address from the driver's phone. During a recent meeting with my accountant, I realized that the 31% commission I already give GrubHub is making it hard to break even, and we will lose revenue if they keep trying to take more delivery customers.

I have actually launched my own campaign against the Google Tax by educating my customers with little handouts letting them know what is happening. I hope you will understand as well and not allow this to continue. Google is a trusted information source, but it is abusing its position in a way that strikes me as backhanded and not very ethical. If it obtained the business owner's consent, that would be different. But without consent, it is not ethical to place third-party services next to my company's online information.

Ironically, I Googled this problem and found forums where businesses shared their stories. Many have complained but have found it is almost impossible to combat. Even when they are successful in having the ads removed, the ads end up reappearing again. The FTC needs to give control of a business's public image back to the business owner. Google pretty much has a market monopoly, and with that comes a responsibility to treat businesses ethically. I have spent three years of my life building this business, and I employ about 10 people. Sharing my online space with certain ads must be my choice. The Google Tax must not be allowed to continue.

Sincerely,

✓
Andrew Ding
Owner



3600 Broadway
New York, NY 10031
Telephone: (617)-686-3671