

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

Google is selling exclusive ads to third-party ordering services, allowing them to use a restaurant's brands to intercept customers. Worse, the ads appear on the restaurant's "knowledge panel" as a link. This content doesn't even look like an ad, it just looks like it's part of the restaurant's information. As a restaurant owner, I have no say on whether or not Google allows these services to use my brand. They are not helping me, they're just using me, and that's not fair.

Plus, Google usually displays the third-party services customer reviews more than the restaurant's actual reviews. As a result, customers are being deprived of information regarding the restaurant, and restaurant owners are not able to show all of their positive reviews in Google. I am not happy with that because it doesn't accurately depict my restaurant. It feels like Google has an ulterior motive, and it seems more of a monetary response than is fair.

Google is using its status as a trusted information source to push these services and gain more profits for itself and the delivery services. This practice is being called the "Google Tax," but it sounds to me as if it's more like a mafia. It's concerning, and it feels like there's nothing you can do because you're a small person and they have the money to back it up. But regardless of how much money these companies can invest, **my** knowledge panel should be the way **I** want it to be.

Further, third-party services usually tend to go higher in the search results than your own website. If all of these ads come up on the top page, and then my restaurant is third or fourth down the line, it concerns me. When you google Greek Eats, a lot of results for other Greek restaurants come up. No one has time to sit there and go through them all. It overloads the customers with information, and it doesn't make any sense because they can't find what they want since all the ads are listed first.

In addition to not providing accurate reviews, these third parties can provide other misinformation. For instance, one service is providing customers an outdated menu from eight years ago, and the prices that appear on it are wrong. Whose problem is that? *Mine*. The customers who see it don't complain to the third party, they complain to *me*. I don't need that, especially since I didn't want my information listed at their site, anyway.

It's upsetting that restaurant owners have no control over this situation. At the very least, I'd like Google to make it clear--cut and dried--to the people doing the online search that these companies have paid to advertise, and they are not related to the restaurant. Google needs to say outright that these are advertisers; we are not providing this as free public knowledge. If they do this, then these companies can advertise wherever they want--**except** for my restaurant's knowledge panel, of course.

Sincerely,

Niko Karaiskos
Owner



1229 1st Avenue
New York, NY 10065