



8021 Main Street  
North Richland Hills, TX 76182



August 10, 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 general manager of Back Forty Smokehouse, a barbecue restaurant in Texas that has been in business a little over five years. When customers search for restaurants like mine on Google, they are often being intercepted by third-party delivery service ads. Google added a link for a third-party ordering service to our restaurant's online knowledge panel, but I didn't ask them to or give them permission to. That doesn't seem fair to me, and the FTC needs to stop Google's unfair business practice.

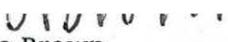
With the unwanted link, people who search for Back Forty Smokehouse now see reviews of the third-party delivery business, like Uber Eats, rather than of our restaurant. Third-party services typically have more customer reviews than the actual restaurant itself, so our online patrons are not seeing the best information regarding our restaurant. It makes me mad that customers see reviews of a delivery service instead of the actual restaurant's reviews.

Finding out that Google is doing this kind of shady stuff makes me very discouraged, especially since Google and the delivery service are profiting off of our restaurant. Google profits from selling the ad to the delivery service, and the delivery service profits from making a commission off of our sales. This "Google Tax" that restaurants are forced to pay certainly raises some red flags. It is a case of bullying on Google's part, and I don't think it's right.

These delivery services charge restaurants as much as 40% on every order and don't provide customers with accurate information. A man representing the delivery service called me and tried to get me to pay them to update our menu online, but I said no. I didn't add the link to that company's version of our menu in the first place, so I shouldn't be forced to pay for it to be changed. Further, I won't pay anyone a commission to deliver my food. I looked into one third-party delivery service, and it's ridiculously expensive. I can't use these services because I can't afford to take any more off of my bottom line. We're barely scraping by as it is.

Without a doubt, my restaurant has lost revenues because of this situation. In addition to directing users to third-party services, Google may even use my restaurant's search results to send users to a different restaurant entirely. That makes me angry because I can't afford to advertise, just as I cannot afford to hire third-party services. They are taking my money by intercepting my customers. Again, this is a case of bullying, especially for a small business owner. Google has an unfair leverage over small restaurants, and the FTC needs to make this situation fair.

Sincerely,

  
Lisa Brown  
General Manager