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An *enormous thread* on alleged **@Google @Facebook** collusion based on the just-released *unredacted* complaint from the Texas AG. First filed December.

Anything PURPLE is newly unredacted.

Yellow/Orange is just normal highlights.

1/?

Online advertising is enormous. Google's Exchange process processes 11bn online ad spaces / day.

Google says "more daily transactions are made on AdX than on the NYSE and NASDAQ combined."

Google also owns the largest buy-side and sell-side brokers. "It is pitcher, batter, and umpire, all at the same time," says complaint.

Senior GOOG employee: “[t]he analogy would be if Goldman or Citibank owned the NYSE.”

More to the point -- if NYSE was the only stock exchange **https://t.co/MrZhy7gB1j**

5. The scale of online display advertising markets in the United States is extraordinary. Google operates the largest electronic trading market in existence. Whereas financial exchanges such as the NYSE and NASDAQ match millions of trades to thousands of company symbols daily, Google’s exchange processes about 11 billion online ad spaces each day. In Google’s words, “[h]undreds of thousands of publishers and advertisers use [Google’s] AdX [exchange] to transact inventory, and more daily transactions are made on AdX than on the NYSE and NASDAQ combined.” At the same time, Google owns the largest buy-side and sell-side brokers. As one senior Google employee admitted, *“[t]he analogy would be if Goldman or Citibank owned the NYSE.”* Or more accurately, the analogy would be if Goldman or Citibank were a monopoly financial broker and owned the NYSE, which was a monopoly stock exchange.

Google started a programme Dynamic Allocation, ostensible to maximize revenue for publishers. In reality it was to "snatch publishers' best inventory at the expense of publishers' best interests," complaint alleges.

To respond, competitors came up with HEADER BIDDING: publishers could route ad inventory to multiple exchanges to solicit highest bid. By 2016, this was adopted by 70% of major US on-line publishers

GOOG to public: "Not at all" a threat to us

GOOG in private: existential threat” **https://t.co/PVAtWZj3r9**

considered insider trading or front running. Google deceptively told the public that "we don't see header bidding as a threat to our business. Not at all." But privately, Google's internal

communications make clear Google viewed header bidding's promotion of genuine competition as a major threat. In Google's own words, header bidding was an "*existential* threat."

11. Google responded to this threat through a series of anticompetitive tactics. First,

Google's response - "secretly made its own exchange win, even when another exchange submitted a higher bid," complaint alleges.

The program's name: Jedi.

Google's own words: Jedi program "generates suboptimal yields for publishers and *serious risks of negative media coverage if exposed externally*."

One GOOG employee proposed **"NUCLEAR OPTION"** of cutting GOOG exchange fees down to zero.

Then comes **@Facebook**. In March 2017 Facebook throws its weight behind header bidding. Big threat.

"Facebook communications reveal that Facebook executives fully understood why Google wanted to cut a deal with them: "they want this deal to kill header bidding." **https://t.co/cvUdgjujp4**

Facebook's marketplace for online ads is known as "Facebook Audience Network" or FAN. Google understood the severity of the threat to its position if Facebook were to enter the market and support header bidding. To diffuse this threat, Google made overtures to Facebook. Internal

Facebook communications reveal that Facebook executives fully understood why Google wanted to cut a deal with them: "they want this deal to kill header bidding."

Google doesn't want to compete with Facebook. Says it would rather "build a moat" by collaborating instead.

Facebook anticipated this in "an 18 month head bidding strategy" -- new unredacted detail.

Facebook and Google allegedly agreed on quotas for how often Facebook would win publishers's auctions -- "literally manipulating the auction with minimum spends and quotas for how often Facebook would bid and win," complaint alleges. **https://t.co/qBfC5Q9Xzn**

14. In the end, Facebook curtailed its involvement with header bidding in return for Google giving Facebook information, speed, and other advantages in the ~43 billion auctions Google runs for publishers' mobile app advertising inventory each month in the United States. As part of this agreement, Google and Facebook work together to identify users using Apple products. The parties also agreed up front on quotas for how often Facebook would win publishers' auctions—literally manipulating the auction with minimum spends and quotas for how often Facebook would bid and win. In these auctions, Facebook and Google compete head-to-head as bidders. Google's internal codename for this agreement, signed at the highest-level, was Jedi Blue—a twist on the Star Wars reference.

Google employees discussed "a Jedi mind trick" on the industry to cut off exchanges in header bidding.

Newly unredacted "tax" figure:

"Google now uses its immense market power to extract a very high tax of 22 to 42 percent of the ad dollars otherwise flowing to the countless online publishers and content producers such as online newspapers"

Old but still juicy: Complaint alleges:

"the open internet is now threatened by a single company"

+

"Google's current dominance is also merely a preview of its future plans"

+

"Google uses "privacy" as a pretext to conceal its true motives."

Unredacted figures:

"publishers generally make almost all (~80 percent) of their revenue from just a small portion (~20 percent) of their impressions." **https://t.co/RYVA59YJAj**

40. The third critical task performed by ad servers is routing inventory correctly between a publisher's direct and indirect sales channels. As Google's internal documents show, only a tiny percentage of publishers' ad impressions are considered "high value," which refers to impressions targeted to users likely to make a purchase. Indeed, publishers generally make almost all (~80 percent) of their revenue from just a small portion (~20 percent) of their impressions. When a publisher like ESPN sells their most valuable inventory directly to an advertiser like Fanatics.com for premium prices, they rely on their ad server to allocate the impressions targeted to high-value users—e.g., sports fanatics who have a propensity for buying merchandise for their favorite sports team—to those direct deals.

Old, still juicy:

"Now, Google monopolizes the publisher ad server market for display inventory through its product called Google Ad Manager (GAM).

Today, GAM controls over 90 percent of this product market in the United States."

How much Google's exchange charges:

"Google's exchange charges publishers 19 to 22 percent of exchange clearing prices, which is double to quadruple the prices of some of its nearest exchange competitors."

"exponentially higher than analogous exchange fees on a stock exchange." **https://t.co/wEVl350A0n**

48. Ad exchanges charge publishers a share of transaction value, which is currently 5 to 20 percent (or more) of the inventory's clearing price. Google's exchange charges publishers 19 to 22 percent of exchange clearing prices, which is double to quadruple the prices of some of its nearest exchange competitors. For example, if Google's exchange sells $100,000 worth of a publisher's inventory, Google will extract at least $19,000. The dramatically higher price (or "take rate") of Google's exchange evidences its substantial market power.

A Google employee conceded: an exchange shouldn't be an immensely profitable business ... (it should be) like a public good used to facilitate buyers and sellers." **https://t.co/vqxsCVBEzP**

50. Internally, Google concedes that an electronic exchange such as its own should not normally be able to extract such high fees in the market. As one Google employee frankly conceded, "an exchange shouldn't be an immensely profitable business" like Google's AdX, but should instead be "like a public good used to facilitate buyers and sellers." As this litigation will make clear, Google can charge these fees for one simple reason: Google uses its monopoly over publishers' ad servers to unlawfully foreclose competition in the exchange market.

Google's Display Advertising Network, GDN, extracts been higher fees: 32-40% **https://t.co/kKwiWwJZjQ**

54. Google's display advertising network, known as the Google Display Network ("GDN"), is described by Google as "the largest ad network in the world." GDN operates as a closed marketplace accessible only by advertisers who use one of Google's products to buy publisher ad inventory. Here, Google charges even higher fees—around 32 to 40 percent of each transaction—to the small publishers and advertisers using GDN than it does to the large players on AdX.

"Google internal documents suggest that Google's share of the market* is eight times larger than FAN's.

*Market here is mobile app network market **https://t.co/HN3uKxA0zf**

55. Google also owns AdMob, the largest ad network selling mobile app inventory on behalf of mobile app developers such as Spotify. Google's closest competitor in the mobile app network market is Facebook's Audience Network, FAN, although Google internal documents suggest that Google's share of the market is eight times larger than FAN's. Advertisers can use Facebook's website to purchase ads on Facebook and Instagram, as well as mobile app inventory from third-party apps like Shazam or Huffington Post who sell their inventory via FAN. In the discrete market for mobile app networks competing to sell third-party app publishers' impressions to advertisers, Google and Facebook compete head-to-head.

"Google Ads" - ad buying tool for what Google calls "smaller, less sophisticated advertisers" charges 8-9% commission to purchase inventory from exchange; or 15% from Google's exchange. **https://t.co/O0xICrefQt**

62. Google operates the largest buy-side middlemen for advertisers, i.e., the ad buying tools for both large and small advertisers. Google's DSP (enterprise buying tool for large advertisers such as Toyota or Nestle) is called DV360; it arose from Google's acquisition of the DSP Invite Media. Google's ad buying tool for small advertisers, on the other hand, is called "Google Ads," and it is designed for (what Google calls) the "smaller, less sophisticated advertisers." DV360 charges advertisers an 8 to 9 percent commission to purchase inventory from exchanges, whereas

Google Ads charges small advertisers a much higher and undisclosed 15 percent commission when purchasing inventory from Google's exchange.

Google considered "creating a completely neutral platform like the NYSE," they ultimately chose instead to stack the deck in their favor by owning the exchange.

Google gives itself speed advantages - that's how it wins 80%+ of auctions on AdX **https://t.co/7tULuBUI3k**

63. Although Google executives considered "creating a completely neutral platform like the NYSE," they ultimately chose instead to stack the deck in their favor by owning the exchange and giving preferred access to Google's buy-side middlemen. Indeed, Google's exchange gives Google Ads and DV360 information and speed advantages when bidding on behalf of advertisers. Such preferred access helps explain why Google's ad buying tools win the overwhelming majority—over 80 percent—of the auctions hosted on Google's dominant ad exchange, AdX.

"GOOG's unilateral ability to extract non-competitive ad server fees demonstrates its monopoly power."

New: GOOG charges 5% of gross spend for routing inventory to non-G exchanges
Its ad server charges 10% fee of gross transactions for routing inventory to non-Google ad networks **https://t.co/6fMD6nOehx**

75. Google's monopoly power in the publisher ad server market is further confirmed by direct evidence. Defying the existence of competitive restraints, Google has degraded quality and charged supra-competitive fees in the publisher ad server market. For example, Google's ad server now charges publishers for routing their inventory to exchanges and networks. When deciding how much to charge publishers for routing their inventory to non-Google exchanges, Google arbitrarily landed on 5 percent of gross spend; they did not consider competitive constraints such as what the market would bear. On top of this, Google's ad server charges a 10 percent fee of gross transactions for routing publishers' inventory to non-Google ad networks. When publishers route their inventory to exchanges and networks using a non-Google routing service called header bidding, publishers pay no fee whatsoever for routing to exchanges and networks. Google's unilateral ability to extract non-competitive ad server fees demonstrates its monopoly power.

"Industry experts compare a change in ad servers to "switching engines in mid-flight." Google's internal documents confirm publishers' high switching costs. Because switching costs are high, publishers are effectively locked in."
Google's ad exchange held 60% share of all display ad inventory sold on US exchanges by Oct 2019.

Among high-value users, its market share is "over 80%"

"Google's closest exchange competitors typically transact a mere 4 to 5 percent of the same publishers' exchange impressions" **https://t.co/FjNQKPhVdO**

85. Google has monopoly power in the United States in the display ad exchange market. Despite an early competitive landscape, Google's ad exchange (historically called AdX) has enjoyed dominance in the United States since at least 2013. By October 2019, it transacted over 60 percent of all display ad inventory sold on ad exchanges in the United States, and that percentage has increased substantially since Google's introduction of Unified Pricing rules in late 2019 (as addressed further in the Anticompetitive Conduct section below).

86. Finally, for online publishers with high-value users, Google's exchange transacts an even greater share of impressions. For example, Google's exchange transacts over 80 percent of one major online publisher's exchange impressions, even though the publisher routes and sells its impressions in at least six other exchanges.

cc **@eric_seufert @DinaSrinivasan @alexdbauer @keleftheriou @AdTechExplained @dhh @jason_kint @CoryMckane @corinnejames @antoniogm @hackingbutlegal @ashleygjovik @larakiara @thezedwards**

More coming....

re Google's monopoly power in the display ad exchange market and charging "supra-competitive prices"

-They are 19-22% of every trade, vs. closest competitors paying 5-15%.

And still, smaller players can't grow. **https://t.co/ZN2m36L5O1**

88. Direct evidence confirms Google's monopoly power in the display ad exchange market. Google's exchange has the power to control prices. It is able to charge supra-competitive

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prices, which are 19 to 22 percent of every trade. By contrast, the prices charged by Google's closest exchange competitors are considerably lower: from 15 percent down to a mere 5 percent. Despite their lower prices, these competing exchanges are simply unable to grow their market share.

Good felt pressure in 2018 on its 20% fee, in 2018.

Yet: Its fee increased from 20% in 2017 to 22% in 2019.

"Google has insulated its exchange from any of the competitive market dynamics that would otherwise incentivize them to lower their prices." **https://t.co/ffr37fNnXq**

89. Additionally, Google's ability to increase prices (i.e., its take rate) in the exchange market further demonstrates its durable monopoly power. Google's 2018 internal documents observed that "[r]ecent market dynamics ... are putting pressure on the 20% fee." Nevertheless, Google did not reduce its average exchange take rate from 2017 to 2020. In fact, Google increased its exchange take rate from 2017 to 2019 (from 20 percent for third-party buyers buying through AdX in 2017 to 22 percent in 2019). The fact that Google did not lower its take rates, and instead increased them, demonstrates that Google has insulated its exchange from any of the competitive market dynamics that would otherwise incentivize them to lower their prices.

"When rival exchanges attempted to gain market share by lowering prices in 2017, Google's exchange maintained or even increased prices and still increased share. Competing exchanges have not been able to meaningfully increase share, despite some cutting take rates by half" **https://t.co/qDzaRSqN0X**

90. Google's monopoly power is also evidenced by the fact that its exchange does not lose market share when competitors drop their prices. For example, when rival exchanges attempted to gain market share by lowering their prices in 2017, Google's exchange maintained or even increased prices and still increased its market share. Competing exchanges have not been able to meaningfully increase their market shares, despite some cutting their take rates by half.

"GDN charges high double-digit commissions of at least 32 percent on advertising transactions, which, according to public sources, is double the "standard rate" elsewhere in the industry."

Why does Google charge such high rates?

Because "we can," executive said in 2016. "Smaller pubs don't have alternative revenue sources." **https://t.co/NssSOyZdL2**

Internally, Google acknowledges that its fees are very high and that it can demand them because

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of its market power. For example, in an internal 2016 conversation, Google executives commented that Google's ad networks make "A LOT of money" with its commission, and they acknowledged that they do this because, quite simply, "we can." "Smaller pubs don't have alternative revenue sources," explained one Google employee when addressing the lack of viable competing ad networks available to its customers.

"Prior to Google's anticompetitive conduct, the markets for ad exchanges and publisher ad servers were competitive...."

In 2009, when Yahoo process 9bn daily ad impressions, Google's exchange transacted fewer than 200m. **https://t.co/nXRgsAxLGx**

118. Prior to Google's anticompetitive conduct, the markets for ad exchanges and publisher ad servers were competitive. When Google originally entered the ad exchange market in 2009, publishers and advertisers had been trading in exchanges for some time. Google was late to enter the ad exchange market and faced significant competition from large and well-funded players like Microsoft and Yahoo!. In 2009, the Yahoo! exchange alone, for example, processed nine *billion* daily ad impressions. After launching that same year, Google's exchange transacted fewer than 200 million daily impressions. At the time, Google also faced significant competition in the publisher ad server market. Google acquired its publisher ad server from DoubleClick in 2008 but faced competition from companies such as 24/7 Real Media (owned by WPP PLC), aQuantive (owned by Microsoft), and ValueClick (publicly traded).

"GOOG monopolized the exchange and ad server markets by forcing publishers to license its ad server and trade in its exchange in order to receive bids from 1m+ advertisers

Google presentation, 2014: "AdX is the only platform with direct access to the entirety of AdWords demand." **https://t.co/iSStC1Ze3f**

123. Google monopolized the exchange and ad server markets by forcing publishers to license Google's ad server and trade in Google's exchange in order to receive bids from the more-than one million advertisers using Google's buying tool, Google Ads. First, Google automatically routed small advertisers' ad network bids to Google's exchange. Additionally, Google refused to route advertisers' bids to non-Google exchanges. Next, Google programmed its exchange to return real-time bids *only* to those publishers using Google's new publisher ad server. As Google's [redacted] wrote in an internal PowerPoint presentation in 2014, "AdX is also the only platform with direct access to the entirety of AdWords demand, one of the world's largest ad networks."

GOOG in 2013 document:

Google are "artificially handicapping [their] buyside [Google Ads] to boost the attractiveness of [their] sell-side (AdX). Specifically, to limit [Google Ads] to buying only on AdX, an exclusivity that makes AdX more attractive to sellers." **https://t.co/h5fAGFqx74**

125. Internal Google documents reveal that Google imposed these bid routing restrictions for the express purpose of foreclosing competition. In a Display Strategy document from August 2012, Google noted that they "are artificially handicapping [their] buyside [Google Ads] to boost the attractiveness of [their] sell-side (AdX). Specifically, to limit [Google Ads] to buying only on AdX, an exclusivity that makes AdX more attractive to sellers."

A bunch of unredacted material on Google's gTrade team relating to how it allegedly manipulates bids without disclosing: **https://t.co/OKcWc7jhx0**

149. Google's New York-based quantitative team "gTrade" designed one such program called Reserve Price Optimization ("RPO"). Google's RPO program uses exclusive access to publishers' user IDs to dynamically adjust the price floors in Google's exchange on a per-buyer basis depending on what Google knows a particular buyer will actually pay. For example, if a publisher had set its floor price to a $10 CPM, RPO can increase the floor price to just below a buyer's predicted willingness to pay, e.g., a $14.50 CPM; this would force advertisers in Google's second-price exchange auctions to pay the RPO floor set by Google, as opposed to the amount bid by the auction's second-highest bidder. In other words, Google would manipulate the bid belonging to a small business advertiser (e.g., a local doctor) from one price to another higher price (e.g., from $8 CPM to $14.50), without disclosing the manipulation to the advertiser. By adjusting floors in this manner, Google ensures that its own exchange transacts publishers' most valuable impressions, even though an advertiser in a non-Google exchange would have otherwise won. Competing exchanges cannot similarly adjust their floors because Google blocks publishers from accessing and sharing their ad server user IDs.

More on gTrade **https://t.co/tb5dwsyAtJ**

150. Google's gTrade team launched another program called Dynamic Revenue Share (DRS) that leverages exclusive access to publishers' ad server user IDs to exclude exchange competition in a second way. Google automatically opted publishers into the DRS program under the misrepresentation that it would make publishers more money. DRS dynamically adjusts the take rate that Google's exchange charges in order to win more impressions, most particularly the high-value impressions. For example, if a publisher offers an impression for sale in Google's

exchange, but the highest bid cannot clear the publisher's price floor due to Google's take rate, DRS can dynamically lower Google's take rate to ensure that the impression will still transact in Google's exchange. In order to know when and by how much Google should vary its take rate with DRS, Google must be able to accurately determine the value of impressions, which depends upon its access to publishers' ad server user IDs. Google forecloses competition in the exchange

gTrade came up with Project Bernanke to use "privileged access to detailed information regarding what advertisers historically bid to help advertisers using Google Ads beat (competitors)."

This is how it works: **https://t.co/uJnSGsLfqQ**

152. To illustrate how Bernanke works, suppose an advertiser using Google Ads (e.g., a local doctor) bids a $10 CPM for a *USA Today* ad impression targeted to John Connor. And suppose a different advertiser (e.g., Ford) bids a $12 CPM through The Trade Desk ad buying tool. Both ad buying tools then route the advertisers' bids to Google's exchange. In the absence of the Bernanke program, Ford's $12 bid would win and Google would extract only one fee (its exchange fee). But the Bernanke program changes the outcome. Bernanke effectively manipulates the doctor's bid without their knowledge (or anyone's knowledge) before routing it to Google's exchange, ensuring that the doctor nonetheless wins the impression targeted to John Connor. In this situation with Bernanke, Google will extract both its exchange fee and a second ad buying

tool fee. In this regard, Bernanke excludes competition from advertisers using non-Google ad buying tools.

"Google's idea with Bernanke was to trade on inside information.... Permitted Google to radically influence the amount of trading executed through Google Ads." **https://t.co/tfOAoRrpLz**

153. According to internal Google documents, prior to Bernanke's introduction, advertisers bidding through competitors' ad buying tools were actually beating the advertisers bidding through Google's ad buying tools. Google's idea with Bernanke was to trade on inside information to help Google reverse this trend. The program permitted Google to radically influence the amount of trading executed through Google Ads and in Google's exchange. Google looked back at the Bernanke program's success as follows: "In the last year, the team launched Project Bernanke, which uses novel trading strategies to increase GDN's win rate on AdX by +20%, reversing a worrisome 2013 trend of AdX buyers growing at GDN's expense." In just the first year of launch, the Bernanke program alone swelled trading in Google's exchange enough to increase annual revenue by $230 million.

Screenshot of Federal Reserve Chairman Ben Bernanke, the namesake of Project Bernanke, discussing quantitative easing on Google's exchange:

In 2015, Google signed agreement with WhatsApp to give users option of backing up their messages.

Users were led to believe they were encrypted. They were not. **@MikeIsaac**

Google knew users were mislead. See quotes: **https://t.co/Waaxt33LMD**

163. Media reports reinforced the idea that no third party had access to users' WhatsApp communications, including those backed up to Google Drive. For example, Mike Isaac with *The New York Times* wrote in 2016, "WhatsApp, the messaging app owned by Facebook and used by more than one billion people, on Tuesday introduced full encryption for its service, a way to ensure that only the sender and recipient can read messages sent using the app." In a similar vein, a 2016 report from Lifehacker, a technology site launched by Gawker Media, stated: "WhatsApp can also backup your messages to Google Drive, though they're encrypted so that shouldn't be that big of a deal. Even if law enforcement requested it from Google, they wouldn't be able to read it."

164. However, this was not true. Conceding this fact in a June 2016 memo, Google wrote that "when WhatsApp media files are shared with 3rd parties such as Drive, the files are no longer encrypted by WhatsApp." The memo continued, "For clarity, all of the [WhatsApp] data stored in Drive is currently encrypted with Google holding the keys." What this meant was that Google, as a third party, could in fact access the photos, videos, and audio files, that users thought they had shared privately on WhatsApp.

165. Google knew users were misled about the privacy of their communications. The same June 2016 memo acknowledges: "WhatsApp's current messaging around end-to-end encryption is not entirely accurate." The memo also states: "WhatsApp currently markets that all communications through its product are end-to-end encrypted, with keys that only the users possess. They have failed to elaborate that data shared from WhatsApp to 3rd party services does not get the same guarantee. This includes backups to Google Drive."

166. Google also knew that it was important for Google Drive users to know the truth: that Google as a third party had access to their communications. The same June 2016 Google memo memorialized, "It's important for users to know that when WhatsApp media files are shared with 3rd parties such as Drive, the files are no longer encrypted by WhatsApp."

"By June of 2016, about 434 million WhatsApp users backed up approximately 345 billion WhatsApp files to Google Drive, netting for Google Drive about a quarter of a billion new Google Drive customers."

New section: Google secretly met with competitors to discuss competition and forestall consumer privacy effort:

Aug 6, 2019: Facebook, Apple, Microsoft & Google discussed *forestalling consumer privacy efforts*

Google prep doc: “we have been successful in slowing down and delaying the [ePrivacy Regulation] process and have been working behind the scenes hand in hand with other companies.”

Google prep doc says aim was to “find areas of alignment and narrow gaps in our positions and priorities on child privacy and safety.”

GOOe expressed particular concern that MSFT was taking child privacy more seriously than Google and sought to rein in Microsoft.

Google was frustrated **@Facebook** was not aligning with it to reduce users’ privacy.

“We’ve had difficulty getting FB to align on our privacy goals and strategy, as they have at time[s] prioritized winning on reputation over its business interest in legislative debates."

GOOG asks MSFT to stop "subtle privacy attacks". Outlines "ways we can work together"

AG: GOOG presents a public image of caring about privacy, but coordinates closely with Big Tech to lobby the government to delay or destroy measures that would actually protect users’ privacy. **https://t.co/4W68dTit6M**

170. The manner in which Google has actively worked with Big Tech competitors to undermine users’ privacy further illustrates Google’s pretextual privacy concerns. For example, in a closed-door meeting on August 6, 2019 between the five Big Tech companies—including Facebook, Apple, and Microsoft—Google discussed forestalling consumer privacy efforts. In a July 31, 2019 document prepared in advance of the meeting, Google memorialized: “we have been successful in slowing down and delaying the [ePrivacy Regulation] process and have been working behind the scenes hand in hand with the other companies.”

171. Google also sought a coordinated effort to forestall and diminish child privacy protections in proposed regulations by the FTC and in proposed legislation by Senators Markey and Hawley. According to the same July 31, 2019 document, Google wanted to use the upcoming meeting with the other Big Tech firms to “find areas of alignment and narrow gaps in our positions and priorities on child privacy and safety.” Google expressed particular concern that Microsoft was taking child privacy more seriously than Google and sought to rein in Microsoft. “Whether at

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this meeting or at another forum, we may want to reinforce that this is an area of particular importance to have a coordinated approach,” read the memo.

172. Not unlike concerns for defections in a price-fixing cartel, Google expressed frustration that companies like Facebook were not aligning with Google to reduce users’ privacy. “We’ve had difficulty getting FB to align on our privacy goals and strategy, as they have at time[s] prioritized winning on reputation over its business interest in legislative debates,” said Google, referring to Facebook.

And...Ending this for now. Got other things to do, alas.

I'm at point 185, page 67, of 481 points and 142 pages.

If you're in this space, happy to share my PDF with all unredactions highlighted. DM me.

More insights in this thread: **https://t.co/KKmC8J8QEo**