Questions for stakeholders (RTB & AdTech)

The ACCC is seeking submissions from stakeholders on the following questions to help it assess whether advertisers and publishers receive sufficient information to make informed choices about the services and providers they will use. Specifically, we are seeking responses to the following questions:

1. *What information do you need about auctions used by an ad tech provider to assess and compare their services to others in the supply chain?*
(a) Why do you need this information and how do/would you use it?
(b) Do you receive this information?
(c) If you do not receive this information, have you sought to obtain this information?

Adform: Adform is an adtech company, providing DSP, Adserving, DMP and SSP services. In order to compete, Adform require the same granular information as all other participants, and prefer that no "walled gardens" exist.

2. *What information do you require, and what do you receive, on the following:*
(a) the factors which are used by an auction's algorithms to select the winning bidder?
(b) the factors used by a bidding algorithm to determine a bid price?
(c) Post-auction information?

Adform: Yes.

3. *Are there differences in the auction information provided by ad tech providers? If so please explain these differences?*

Adform: Yes, there probably is. Adform is not privy to what other SSP's provide, but in general, Adform provide full transparency to our publisher clients upon request.

4. *Do publishers currently receive sufficient information from SSPs to verify the accuracy of the fees charged?*

Adform: This is a question better answered by the publishers. But in general, there are trends that the same granular data is not provided by all SSP's. This of course leads to a situation, where competition can not be compared on an "apples to apples" perspective.

5. *Does the availability of such information vary between SSPs?*

   Adform: We would assume so, yes.

6. *What information about fees charged across the supply chain is available to advertisers and publishers?*
   (a) Why do you need this information and how do/would you use it?
   (b) Do you receive this information?
   (c) If you do not receive this information, have you sought to obtain this information?

   Adform: The more transparency given, the better the insights we can give on the value that we – as an adtech company – give. Adform is committed to being transparent, and will provide this to our customers on request.

7. *What additional information about fees or take rates to advertisers and publishers require?*

   Adform: When they ask, they require full transparency across the products and campaigns they have run. Bidding prices, Adform's fees for the service we provide etc. Adform is transparent about out fees in our commercial documents and the "take rate" is negotiated.

8. *How does a lack of information about fees or take rates impact the ability of advertisers and publishers to make informed choices about how they will use services in the ad tech supply chain?*

   Adform: If we, as a transparent platform, compete with a platform that is not transparent about fees etc, it is hard for the publishers and advertisers to compare us on equal terms.

9. *Are you satisfied with the services provided by verification and attribution providers? If not, what are you not satisfied with regarding their service?*

   Adform is happy about the third party verification providers whom we work with ourself. It is not possible for us to verify others.

10. *Do you consider that the metrics you received from your verification and attribution provider are accurate?*

    Adform: Yes we do.

11. *Would you be able to switch measurement and verification providers if you wanted to? What are the largest obstacles to you switching, if any?*

    Adform; Yes we would. Largest obstacles would be (i) the technical setup and (ii) our back-to-back contracts with clients, which may need updating

12. *Are advertisers able to independently verify the performance of ads served on YouTube?*

    Adform: No, not to our knowledge. In order to measure on YouTube, it is mandatory to use the Google Adtech stack.

13. *Can third party verification and attribution providers access sufficient data through the Google Data Ads Hub to independently verify the performance of ads served on YouTube? If not, what data do verification and attribution providers require access to in order to perform this function?*

    Adform; in our opinion, no. Adform would prefer that Adform itself could use our own services, to measure (and not be dependant on Google's own aggregated measuring.

14. *Does providing third party verification providers with access to raw data, or allowing them to place verification tags (or pixels) on ads, create privacy concerns?*

Adform; that depends on what is measured. If access is given to true personal identifiable information (name, email etc), the it does indeed. If the raw data on the other hand solely show psydominized data in regards to cookie data, then the privacy concerns are less.

15.   *Are advertisers currently able to conduct effective and independent attribution of their ad campaigns?*

Adform; When using our stack, yes.

16.   *Will upcoming changes Google is making to the data it shares and Google Chrome affect advertisers' ability to conduct multi-touch attribution? If so, what will this impact be?*

Adform; We think this is too early to be able to provide an answer to. There is a lot of moving pieces in the Google Privacy Sandbox which are not yet clear to anybody outside Google.

17.   *Will access to the data via the Google Ads Data Hub allow advertisers to conduct full and independent attribution of Google's DSP services?*

Adform; We do not know.

18.   *Does the use of user IDs and cookies in providing attribution services create privacy concerns?*

Adform: Please refer to answer 14.

19.   *Do stakeholders consider there are any other issues with the ability to conduct attribution of ad tech services?*

Adform: No comments

20.   *Do you have to access the data you need to conduct verification of Google's ad tech services? If not, what data do you require that is not available?*

Adform; probably not no. We cannot measure on website where Google is the publisher (e.g. YouTube). What we would require is

*the same information as is available on standard publisher
websites.*

21.   *How does the ability to verify the performance of Google's DSP
services compare to other DSPs?*

**Adform: In order to compete on a "apples to apples" perspective,
the same amount of granular data should be available. Hence, if
we cannot measure performance in a "like-for-like" basis, this is
a challenge.**

22.   *What measures would be most effective to ensure that all DSP
services can be fully and independently verified?*

**Adform; that all DSP's are required to give equal access and that
such reports are controlled by true independent (non-
commercial) agencies.**

23.   *What are the risks to user privacy from third parties providing full
verification services? Could such measures promoting this be
implemented in a way that would protect the privacy of consumers?*

**Adform; yes, we would think so if the independent measures are
done on psydominized data solely (of course subject to
applicable laws)**

24.   *Would a common transaction ID assist in making pricing and
auctions more transparent?*

**Adform; Yes, assuming is it truly unique and used across all
websites. We would prefer such unique ID to be owned by an
industry organization (and not one of the participants in the
industry)**

25.   *What risks does a common transaction ID pose to user privacy?*

**Adform: If there is a breach, it would of course be a privacy
challenge. Hence, we also think that in line with the requirements
in Europe, under the GDPR that consent from the users is**

required. Further, the unique ID becomes a challenge as well – from a competitive perspective – if not all stakeholders are using the same one

26.   *How could a common transaction ID be implemented in a way which mitigates any risks to consumers' privacy?*

Adform: One way would be that (i) it is psydominized, (ii) runs for a short period of time and (iii) is subject to consent from the users

27.   *How should such a recommendation be implemented?*

Adform; With main, major countries agreeing in a unified approach to this – with no deviations to the local legal interpretation

28.   *Would a common user ID be an effective way to improve transparency in the ad tech supply chain?*

Adform; Yes, assuming all browser and participants use the same, it would, if used across the open web.

29.   *Could this proposal be implemented practically and is it justified?*

Adform; A broad and very detailed discussion would be needed amongst regulators, countries, market participants etc.

30.   *Could this proposal be implemented in a way which protects consumers' privacy? If so, how?*

Adform: by using only (i) psydominized data, that (ii) has a short life span. It should of course exempt any sensitive data.

31.   *What challenges do publishers face in their inventory being blocked due to brand safety issues?*

Adform; the obvious one is that they are not able to monitize their websites and hence are not able to make a profit and pay its

journalists salary etc. This could be considered a threat to the open internet and to freedom of speech.

32.   *Do publishers experience any problems in dealing with or negotiating terms with measurement and verification providers?*

Adform: We cannot answer, as we are not a publisher.

33.   *Are measures, such as standardised taxonomies, or requirements on verification providers to provide publishers with information about changes to their processes, required to address issues with verification providers blocking legitimate publisher websites?*

Adform. Not sure, but it would of course aide.

34.   *What is the scale of the problem posed by the publication of scam ads on publisher websites?*

Adform: Adform does not have any recent data on this. We have an old analysis published here from 2017, showing some of the problem: https://www.wsj.com/articles/fake-ad-operation-used-to-steal-from-publishers-is-uncovered-1511290981

35.   *What are the risks to publishers when scam ads are displayed on their properties?*

Adform: It is multifaceted. One obvious one is that they do not get remunerated by the scam sites as there is no one to pay the bill. Secondly the ads shown may contain messaging which can hurt their messaging. This may also be a concern from the other – non-scam ads – which are viewed next to the scam ads. These advertisers may become upset about this. Thirdly, having scam ads on your website, can mean that the adtech industry may "penalize" this website or publisher and thereby restrict their ability to sell their inventory.

36.   *What measures do ad tech providers take to prevent the delivery of scam ads?*

Adform: At Adform, we work with various providers who look for the bad eggs. When we get notified, we block those IP addresses etc. Further, our systems look for anomalies itself, and if to many, we discuss and take proactive measures.

37.   What measures are available to publishers to stop the delivery of scam ads once they are identified?

Adform; Please ask the publishers.

38.   Are there difficulties experienced by publishers in stopping scam ads being delivered to their properties? If so, what are they?

Adform; It is hard to find the scams. The adtech ecosystem is, outside the walled gardens, an open ecosystem running on the open web standards.