

Digital Platform Services Inquiry

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About DCS Group

DCS Group is Australia's second-largest Debt Agreement Administrator. We are a second-generation, 100% family-owned business. We have 46 staff located in Brisbane (no outsourced staff). We have 6,500 ongoing clients, who will all be debt-free in 3-5 years. Past clients who have now completed their Debt Agreements, have now cleared over a quarter of a billion dollars in consumer debt.

DCS Group is thankful for the opportunity to provide a submission to the Ad Tech Inquiry.

DCS Group's Online Advertising

DCS Group's marketing is entirely online. We have a full-time staff member devoted to online marketing. Since our business began 20 years ago, our advertising has transitioned from 100% traditional media (yellow pages, print, TV, radio) to currently 100% online.

The move to online has been driven primarily by consumers moving away from traditional media and toward online.

We have had several meetings with National Managers at Google, have been invited to conferences at Google and have account managers and other contacts within Google.

Issues with the Online Advertising Market Place.

Google Selling Trademarked Brand Names

Our move to 100% online has been accelerated by Google permitting the competitors to bid on our registered trademarks. For example: If someone Googles "Beyond Debt" our registered trademark, they we be presented with advertisements from our competitors. If we advertise in legacy media (print, tv, radio), anyone who saw the advertisement and Googled us, as most potential clients do, are presented with a long list of our competition. This reduces the return on investment from offline ads making them not cost-effective.

Anticompetitive Selling of Google Search Ads.

The nature of Google's search marketing bidding is anticompetitive.

Google search, displays four ads above the search results and three advertisements below the search result. Our publicly listed competitor frequently runs ads from multiple websites, allowing them to occupy three to four of the seven available ad locations. This has two anticompetitive consequences:

Firstly, it reduces the chance that a prospective client will see our advertisement. Please refer to Appendix Item 1 (Debt Agreement Search). Beyond Debt appears at number one, but FSA Group, our publicly listed competitor, occupies the next three slots, giving them 75% of the "real estate".

The second anticompetitive effect of allowing one company to buy up multiple spots is that it dramatically increases the cost of advertising, as each of the spots is competitively bidding against each other. This could be part of a concerted strategy to price out competition. Over the last ten years, the cost of clicks on Google has increased by over 100%.

Google even has a policy regarding this: the "Gaining an unfair advantage" policy. A policy that they choose not to enforce. We have made numerous complaints through an online form as directed by Google. I eventually received a call from a rep who told me it was not in breach of the policy because the sites use a different credit card, even though they are aware that the sites are in fact the same company.

Index 1 Debt Agreement Search

Fox Symes, Resolve Your Debt and Dealing with Debt are all the Same Company.



Debt Agreement



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About 307,000,000 results (0.32 seconds)

Ad · <https://info.beyonddebt.com.au/debt-agreements> ▾ 1300 861 740

Debt Agreements Australia - We've Helped 14,000+ Aussies

We assist Australians with Part 9 & Part 10 **Debt Agreements**, and other options.

[Get quote - Discover Your Options Today](#)

What is a Debt Agreement?

Settle your debts and start living.
Find out how you would benefit

Who is Beyond Debt?

Find out more about who we are.
See why we are your best option.

Ad · <https://www.foxsymes.com.au/> ▾ 1300 361 204

Debt Agreement - Debt Consolidation Loans

Reduce **Debts**, Consolidate Payments, Avoid Bankruptcy. Resolve Your **Debt** & Take Control Now

Ad · <https://www.resolveyourdebt.com.au/> ▾

Debt Agreement - Check if you qualify now

Consolidate **Debts** Into One Repayment, Lower Interest, Become **Debt** Free. Take Control Now!

Ad · <http://www.dealingwithdebt.com.au/> ▾

Debt Agreement - Online Debt Relief Eligibility

People struggling with \$10k+ of **debt** & behind on bills may not know this! Get help today.