

# Submission to ACCC

Please note, this document is the second part of a submission by Sites n Stores.

This element of the submission contains our recommendations for advertising agencies.

We would be happy to discuss these points in further detail should the ACCC see merit in such a discussion.

## Recommendations For Advertising Agencies

1. Disclose rebates received from advertising platforms in % and \$ to advertisers.
2. Disclose total fees retained for services and fees paid to platforms as separate and easily understood.
3. Disclose (any) relationship with advertising platforms and how this impacts fees.
4. Fully disclose money and gifts received from advertising platforms.
5. Fully explain choice of platforms and income from each.
6. Fees for advertisers need to be explained per platform and income received from each.
7. Results received need to be explained per platform so the advertisers can aid in decisions regarding future commitments per platform.

8. Revenue per platform needs to be more easily assessed so better decisions can be made by advertiser.
9. Software should be provided by advertising platforms so-as to track attribution and successes from advertising platforms.
10. Attribution of success needs to be more easily discovered. When opacity is retained the less is known about where the revenue is coming from. It is convenient for an agency to claim this and benefit when a retainer is based upon % of advertiser spend.
11. Close relationships with Google (for example) need to be disclosed and the financial benefit for the agency.