<u>**Taboola's Feedback on the ACCC's Interim Report: Digital advertising services inquiry (December 2020)**</u>
Submitted: 30 March 2021

A. *Many stakeholders have raised concerns regarding the competitive impact of restrictions to ad tech providers' ability to access data, particularly in relation to Google's proposal to block third-party cookies on its Chrome web browser. The ACCC is seeking further stakeholder views on, and is monitoring developments on, this proposal.* **(p. 56)**

Confidential version[1]:

Public version:

No submission.

B. *The ACCC is also interested in stakeholder views about the substitutability between DSPs and ad networks.* **(p.105)**

As an ad network, part of Taboola's product offering is serving demand to publishers via its discovery platform technology. Specifically Taboola works with advertisers to manage campaigns and creatives; and offers audience targeting. Through its algorithm, Taboola's DSP bids on multiple types of supply, in order to achieve advertisers' campaign goals. Taboola would therefore consider that it competes with other DSPs for such provision of advertiser demand to its publisher partners.

C. *The ACCC is also interested in stakeholder views about the substitutability between SSPs and ad networks.* **(p.111)**

Similarly, as with respect to DSPs, part of Taboola's offering is the supply of inventory to its advertisers and it would therefore consider other SSP providers as competitors for such supply. Specifically, Publishers generally use the services of SSPs in two ways: (i) as a demand source that bids into dedicated publisher real estate, i.e., placements; and (ii) as an ad server, i.e., a platform to manage its placements and mediate between demand sources, enabling the publisher's direct sold demand. Generally, Taboola integrates with its publisher partners in two ways, either: (i) mediated by an ad server, such as Google Ad Manager; or (ii) directly on the page in its placements. In both cases Taboola is a source of demand to its publisher partners, as an ad server with solutions, which enable publishers to also serve their direct demand.