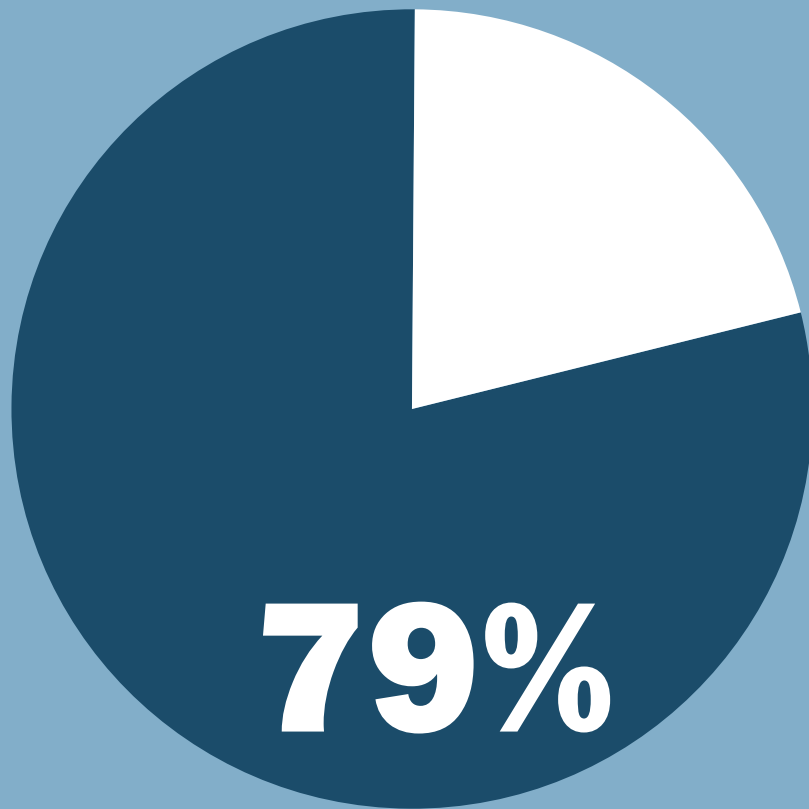


GOOGLE FLIGHT SEARCH

IS GOOGLE KEEPING ITS PROMISES ON ITS SOFTWARE?

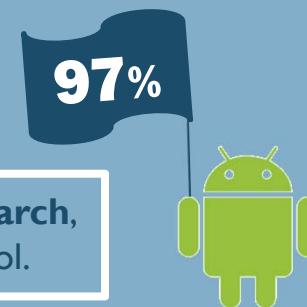
ONE COMPANY, GOOGLE, DOMINATES SEARCH



Google controls more than 79% of search in the U.S. and up to 94% in some EU countries.

Its closest competitor, Bing, conducts only 9% of general searches.

And don't forget about **mobile search**, where Google has even *more* control.



BUT VERTICAL SEARCH IS COMPETITIVE, FOR NOW

Google acknowledges it faces competition from “vertical search engines and e-commerce sites, such as WebMD (for health queries), Kayak (travel queries), Monster.com (job queries), and Amazon.com and eBay (commerce).”



travel



shopping



video



local



maps



financial

VERTICALS LIKE:

“These vertical markets, which like online travel search, serve specialized needs, require unique inputs and/or technology, and are narrow enough to prevent Google’s tremendous scale advantage from overwhelming competition, are in a sense all that remains of the online search frontier.”

“Maintaining competitive markets for both general and niche search may be the only alternative, ultimately, to **an unregulatable monopoly.**”

[American Antitrust Institute](#) 2/18/11

GOOGLE LOOKS TO DOMINATE VERTICAL SEARCH

In order to protect and extend its dominance in search and search advertising, Google is expanding into these areas of vertical search and giving preferential placement to its own sites.

The image shows a collage of Google search results for three queries: 'washington dc', 'restaurants washington dc', and 'nike running shoes cheap'. A green box with the text 'GOOGLE'S PRODUCTS INSERTED IN THE "ORGANIC" RESULTS' has arrows pointing to specific results in each search. For 'washington dc', it points to a map result. For 'restaurants washington dc', it points to a list of restaurant results. For 'nike running shoes cheap', it points to a shopping results section showing various Nike shoes.

GOOGLE'S PRODUCTS INSERTED IN THE "ORGANIC" RESULTS

GOOGLE, WITH ITS MONOPOLY POWER, HAS BOTH THE **INCENTIVE** AND THE **ABILITY** TO EXCLUDE COMPETITORS IN THIS MANNER.

GOOGLE SAYS...

“We believe users come first.”

“We believe in choice.”

“We believe in transparency.”

Google’s “[Facts about Google and Competition](#)”

“We built Google for
consumers, not websites.”

Google’s “[Facts about Google and Competition](#)”

THE PROBLEM?


**“THE GOALS OF THE ADVERTISING BUSINESS
MODEL DO NOT ALWAYS CORRESPOND TO
PROVIDING QUALITY SEARCH TO USERS.”**

Google founders Larry Page and Sergey Brin
in their Stanford thesis that formed basis for the company

CASE STUDY: GOOGLE FLIGHT SEARCH

“In mid-2010, Google got serious about travel. Given that over half of travel sales are consummated online, Google wasted no time with DIY solutions. It went shopping and bid \$700 million in cash to buy ITA Software, a Cambridge (Mass.)-based travel software company that was founded in 1996 by scientists at MIT to provide search services for airlines and other travel operators.” [[Bloomberg](#) 2/13/11]

WHAT GOOGLE SAID:



Facts about Google's acquisition of ITA Software

[Home](#)
[Benefits](#)
[Competition](#)
[What people are saying](#)
[FAQ](#)
[Claims vs. Facts](#)
[Blog post](#)
[Press release](#)

On July 1, 2010, Google announced an agreement to acquire ITA Software, a Cambridge, Massachusetts flight information software company, for \$700 million, subject to adjustments.

- Google's acquisition of ITA Software will create a new, easier way for users to find better flight information online, which should encourage more users to make their flight purchases online.
- The acquisition will **benefit passengers, airlines and online travel agencies** by making it easier for users to comparison shop for flights and airfares and by driving more potential customers to airlines' and online travel agencies' websites. Google won't be setting airfare prices and has no plans to sell airline tickets to consumers.
- Because Google doesn't currently compete against ITA Software, the deal will **not change existing market shares**. We are very excited about ITA Software's [QPX](#) business, and we're looking forward to working with current and future customers. Google will honor all existing agreements, and we're also enthusiastic about adding new partners.

GOOGLE: FLIGHT SEARCH DESIGNED FOR USERS

“Google’s acquisition of ITA Software will create a new, easier way for users to find better flight information online, which should encourage more users to make their flight purchases online.”

[Google’s “[Facts about Google’s Acquisition of ITA Software](#)”]

The screenshot shows a Google search for 'jfk to dallas'. The search bar at the top contains 'jfk to dallas' and a magnifying glass icon. Below the search bar, it says 'About 13,600,000 results (0.25 seconds)'. The results are divided into two columns. The left column contains several ads and a flight results section. The right column contains more ads. A green box highlights the flight results section on the left, and a green arrow points from the text 'But is Google Flight Search really the best tool for answering a user's travel search query?' to the flight results section.

Flights from New York, NY (JFK) to Dallas, TX (DFW)

Depart	Wed December 28	Return	Sun January 1
Nonstop			
	Delta	3h 55m	from \$574
	American	3h 45m	from \$599
All flights			
	American	3h 45m+	from \$508
	US Airways	5h 30m+	from \$601
	Other airlines	7h 10m+	from \$886

[More Google flight search results](#)

Home | The Sixth Floor Museum
[www.jfk.org/](#)
The Sixth Floor Museum at Dealey Plaza in **Dallas**, Texas, chronicles the assassination and legacy of President **John F. Kennedy** and presents contemporary ...
[Visit](#) - [About the Museum](#) - [Contact Us](#) - [Store](#)

Plan Your Visit | The Sixth Floor Museum
[www.jfk.org/go/visit](#)
... to plan your visit to The Sixth Floor Museum at Dealey Plaza in **Dallas**, Texas. ... officers and witnesses to the assassination of President **John F. Kennedy**. ...

Flights from JFK to DFW - Save up to \$500 on Your Full Trip.
[www.expedia.com/JFK_DFW](#)
Fly New York to **Dallas** for Less.

Dallas @ \$189 Round Trip
[dallas.cheapoair.com/Cheap-Flights](#)
cheapoair.com is rated ★★★★★ 177 reviews
Cheap Airfare Guaranteed On Flight. Book Now & Save \$10 Extra. Hurry!

Flights To Dallas - Low Fares on American Airlines | AA.com
[www.aa.com](#)
Book on AA.com Today & Save!

NYC Airport Shuttle
[www.nycairporter.com](#)
Departs Every 30 Min From JFK, LGA, To NYC. Lowest Fares To Midtown

Fly Cheap To Dallas
[www.shermanstravel.com/Dallas](#)
Search Low Fares To **Dallas**
Compare & Save Up To 70% Now.

\$49* Flights to Dallas
[www.farespotter.net/Dallas-Flights](#)
Promos on **Dallas** Flights!
Book Flight Now from \$49*

Cheap Airline Tickets
[www.airgorilla.com](#)
International and Domestic Flights
Super Saver Airfares

Dealfind™ Official Site
[www.dealfind.com/Dallas](#)
Save 50-90% On Holiday Gifts For Friends and Family- Buy One Today!

From JFK
[www.cheapflights.com/JFK](#)
Find & Compare Cheap **JFK** Flights For Your Trip-Save on Travel Today!

Flights New York - Dallas
[www.edreams.net/New_York-Dallas](#)
New York-**Dallas** from \$230
Check our Special Offers!

[See your ad here >](#)

Consumers expect the most relevant result to be listed first.

But is Google Flight Search really the best tool for answering a user's travel search query?

LET'S TAKE IT FOR A TEST DRIVE...

NOV. 2011: GOOGLE ROLLS OUT FLIGHT SEARCH

Right away, Flight Search appeared to be “hard-coded” as the top entry “organic” result similar to how Google preferences Maps or Finance.

Vertical search competitors (in this case companies like KAYAK, Expedia and Orbitz) are pushed out of “organic” search results and, in order to be seen, must pay for advertising.

**FLIGHT SEARCH
INSERTED INTO THE
“ORGANIC” RESULTS**

**ARE THESE REALLY
THE MOST RELEVANT
SEARCH RESULTS?**

jfk to dallas

About 13,600,000 results (0.25 seconds)

Ads - Why these ads?

Flights from JFK to DFW - Save up to \$500 on Your Full Trip.
www.expedia.com/JFK_DFW
Fly New York to Dallas for Less.

Dallas @ \$189 Round Trip
dallas.cheapoair.com/Cheap-Flights
cheapoair.com is rated ★★★★★ 177 reviews
Cheap Airfare Guaranteed On Flight. Book Now & Save \$10 Extra. Hurry!

Flights To Dallas - Low Fares on American Airlines | AA.com
www.aa.com
Book on AA.com Today & Save!

NYC Airport Shuttle
www.nycairporter.com
Departs Every 30 Min From JFK, LGA, To NYC. Lowest Fares To Midtown

Fly Cheap To Dallas
www.shermantravel.com/Dallas
Search Low Fares To Dallas
Compare & Save Up To 70% Now.

\$49* Flights to Dallas
www.farespotter.net/Dallas-Flights
Promos on Dallas Flights!
Book Flight Now from \$49*

Cheap Airline Tickets
www.airgorilla.com
International and Domestic Flights
Super Saver Airfares

Dealfind™ Official Site
www.dealfind.com/Dallas
Save 50-90% On Holiday Gifts For Friends and Family- Buy One Today!

From JFK
www.cheapflights.com/JFK
Find & Compare Cheap JFK Flights
For Your Trip-Save on Travel Today!

Flights New York - Dallas
www.edreams.net/New_York-Dallas
New York-Dallas from \$230
Check our Special Offers!

See your ad here >

Flights from New York, NY (JFK) to Dallas, TX (DFW)

Depart Wed December 28 Return Sun January 1

Nonstop	Delta	3h 55m	from \$574
	American	3h 45m	from \$599
All flights	American	3h 45m+	from \$506
	US Airways	5h 30m+	from \$601
	Other airlines	7h 10m+	from \$886

[More Google flight search results](#)

[Home | The Sixth Floor Museum](http://www.jfk.org/)
www.jfk.org/
The Sixth Floor Museum at Dealey Plaza in Dallas, Texas, chronicles the assassination and legacy of President John F. Kennedy and presents contemporary ...
[Visit - About the Museum - Contact Us - Store](#)

[Plan Your Visit | The Sixth Floor Museum](http://www.jfk.org/go/visit)
www.jfk.org/go/visit
... to plan your visit to The Sixth Floor Museum at Dealey Plaza in Dallas, Texas. ... officers and witnesses to the assassination of President John F. Kennedy. ...

**PAID AD
SPACE**

MOST CONSUMERS SEEK LOWEST PRICES, BUT...

Unlike most travel search engines, Google Flight Search does not initially sort by price.

A query from LAX to JFK on Google yields a top result priced at \$1,311.

This result is several links above less-expensive, similar flights priced at \$996.

Google

Everything
Flights
More

Any number of stops
Nonstop
1 stop or less

Any airline
Oneworld
SkyTeam
Star Alliance
Specific airlines...

Any connection
Connect via...

Any outbound time
Specific time...

Any return time
Specific time...

From Los Angeles (LAX) To New York (JFK)

Seattle \$409, Eugene, Boise \$577, Salt Lake City \$434, Denver \$463, Phoenix, Los Angeles, San Francisco \$335, Billings \$982, Fargo \$793, Minneapolis \$674, Omaha \$815, Chicago \$648, Saint Louis \$747, New York, Oklahoma City \$801, Nashville \$820, Dallas \$560, Atlanta \$705, Houston \$718, Orlando \$812

Depart Wed, November 23 Return Sun, November 27

Price Any (auto) Duration Under 6h 37m (auto)

Outbound flight Los Angeles to New York 19 of 77 results

Takeoff	Dur.	Arrival	Airline	Route	Round trip
6:30 am	—5h→	2:53 pm	Delta		6 from \$1,311
7:15 am	—5h→	3:28 pm	JetBlue		5 unknown price
7:40 am	—5h→	3:59 pm	Virgin America		4 from \$1,308
8:30 am	—6h→	5:06 pm	Delta		6 from \$1,416
10:40 am	—5h→	7:01 pm	Virgin America		4 from \$996
11:05 am	—6h→	7:35 pm	American		6 from \$1,613
11:30 am	—6h→	8:04 pm	Delta		6 from \$1,416

GOOGLE EXCLUDES LOWER-PRICED OTA FARES

Google Flight Search ***excludes*** from its own results fares provided through ***other online travel sites***, like Expedia, Travelocity and KAYAK.

By excluding these companies from its searches, Google prevents consumers from seeing special fares the airlines have negotiated with consolidators which combine multiple carriers.

Instead, consumers trying to book multiple-carrier flights on Google are instructed to visit the individual airlines' websites to purchase one-way tickets for each of the legs (no links are provided).

This decreases the likelihood that the consumer will actually book this lower-priced flight.

Google Flight Search interface showing results for New York (all airports) to Jackson (JAN) from Saturday, January 21 to Wednesday, January 25, 2012. The search criteria include a price filter of "Under \$347 (auto)" and a duration of "Any".

The results are categorized by "Outbound flight" and "Round trip". The "Outbound flight" section shows 84 of 92 results. The "Round trip" section shows 5 results.

Outbound flight results:

Takeoff	Dur.	Arrival	Airline	Route	Round trip
5:00 am	—2h—	6:52 am	US Airways 989	EWR-CLT, 2h 28m layover	JAN 21, 2012
9:20 am	—2h—	10:17 am	US Airways 2317	CLT-JAN Operated by US Airways Express-PSA Airlines	
5:05 pm	—1h—	6:08 pm	Delta 4220	JAN-MEM, 52m layover Operated by Pinnacle DBA Delta Connection	JAN 25, 2012
7:00 pm	—3h—	10:40 pm	Delta 5392	MEM-EWR Operated by ASA DBA Delta Connection	

Airline site: US Airways, Delta Total: **\$343** Book

No booking links available. Contact airline directly.

Round trip results:

Takeoff	Dur.	Arrival	Airline	Route	Round trip
5:30 am	—4h—	8:30 am	Continental 1697	EWR-IAH, 1h 45m layover Sold as United 1697	JAN 21, 2012
10:15 am	—1h—	11:42 am	Continental 4928	IAH-JAN Sold as United 4928 Operated by Colgan Air DBA CO Connection	
5:51 am	—2h—	8:31 am	US Airways 2526	JAN-CLT, 1h 14m layover Operated by US Airways Express-PSA Airlines	JAN 25, 2012
9:45 am	—1h—	11:10 am	US Airways 1434	CLT-BWI, 2h 06m layover	
1:16 pm	—1h—	2:29 pm	Continental 4169	BWI-EWR Operated by Expressjet Airlines Inc DBA CO Express	

Airline site: United, US Airways, Continental Total: **\$345** Book

5:46 am —7h— 11:42 am Continental from LGA via Houston 5 from **\$304**

USERS OFTEN UNABLE TO BOOK TICKETS

Google's Flight Search only links consumers to a subset of airlines for booking. Instead, many users are sent to the airline website where they are forced to redo their search.

Google

From: Dallas (all airports) To: Los Angeles (LAX)

Everything
Flights
More

Any number of stops
Nonstop
1 stop or less
2 stops or less

Any airline
Oneworld
SkyTeam
Star Alliance
Specific airlines...

Any connection
Connect via...

Any outbound time
Specific time...
Dep. | Arr. 12am - 12am

Depart: Mon, December 12 One way Add return date

Price: Any Duration: Any

One way flight Dallas to Los Angeles 172 of 172 results

Takeoff	Dur.	Arrival	Airline	Route	Price
7:00 am	3h	8:25 am	Virgin America 871	DFW-LAX nonstop	DEC 12, 2011
Airline site: Virgin America Total: \$100 Book					
6:25 pm	3h	7:50 pm	Virgin America	from DFW	\$100
7:55 am	6h	12:05 pm	Virgin America	from DFW via San Franc...	\$110
3:05 pm	6h	6:36 pm	US Airways	from DFW via Phoenix	\$110
3:05 pm	7h	8:12 pm	US Airways	from DFW via Phoenix	\$110
6:00 am	5h	9:12 am	US Airways	from DFW via Phoenix	\$125
6:00 am	8h	11:45 am	US Airways	from DFW via Phoenix	\$125
8:10 am	6h	11:45 am	US Airways	from DFW via Phoenix	\$125
12:05 pm	5h	3:19 pm	US Airways	from DFW via Phoenix	\$125
6:20 pm	5h	9:47 pm	US Airways	from DFW via Phoenix	\$125
10:10 am	7h	3:10 pm	Spirit	from DFW via Las Vegas	\$153

No booking links available. Contact airline directly.

\$100

No booking links available. Contact airline directly.

\$100

FLIGHT SEARCH: ALGORITHM OR BIAS?

Google's Flight Search initially lists flights by departure time. However, a box at the bottom indicates some carriers are excluded. Clicking on the "show all results" reveals additional results – without any obvious reason for exclusion. At best, it's an inconvenience to users resulting from its algorithm. At worst, Google has some economic incentive to exclude these carriers and favor the others.

Outbound flight Los Angeles to New York						17 of 88 results
Takeoff	Dur.	Arrival	Airline	Route	Round trip	
6:00 am	5h →	2:27 pm	United		1 from \$1,124	
6:30 am	5h →	2:53 pm	Delta		1 from \$1,124	
8:05 am	5h →	4:30 pm	American		1 from \$1,124	
8:13 am	5h →	4:35 pm	United		1 from \$1,124	
8:30 am	6h →	5:06 pm	Delta		1 from \$1,124	
11:30 am	6h →	8:04 pm	Delta		1 from \$1,124	
11:37 am	5h →	7:59 pm	United		1 from \$1,124	
1:30 pm	5h →	9:55 pm	Delta		1 from \$1,124	
1:41 pm	5h →	9:59 pm	United		1 from \$1,124	
1:45 pm	5h →	10:05 pm	American		1 from \$1,124	
3:40 pm	5h →	11:55 pm	Virgin America		6 from \$1,069	
4:12 pm	5h →	12:29 am **	United		1 from \$1,124	
4:30 pm	5h →	12:52 am **	Delta		1 from \$1,124	
9:30 pm	5h →	5:45 am **	Delta		1 from \$1,124	
9:30 pm	5h →	5:45 am **	Virgin America		6 from \$1,069	
11:30 pm	5h →	7:45 am **	Delta		1 from \$1,124	
11:35 pm	5h →	7:50 am **	Virgin America		6 from \$1,069	
Show all results including:						US Airways, Sun Country, JetBlue from \$874

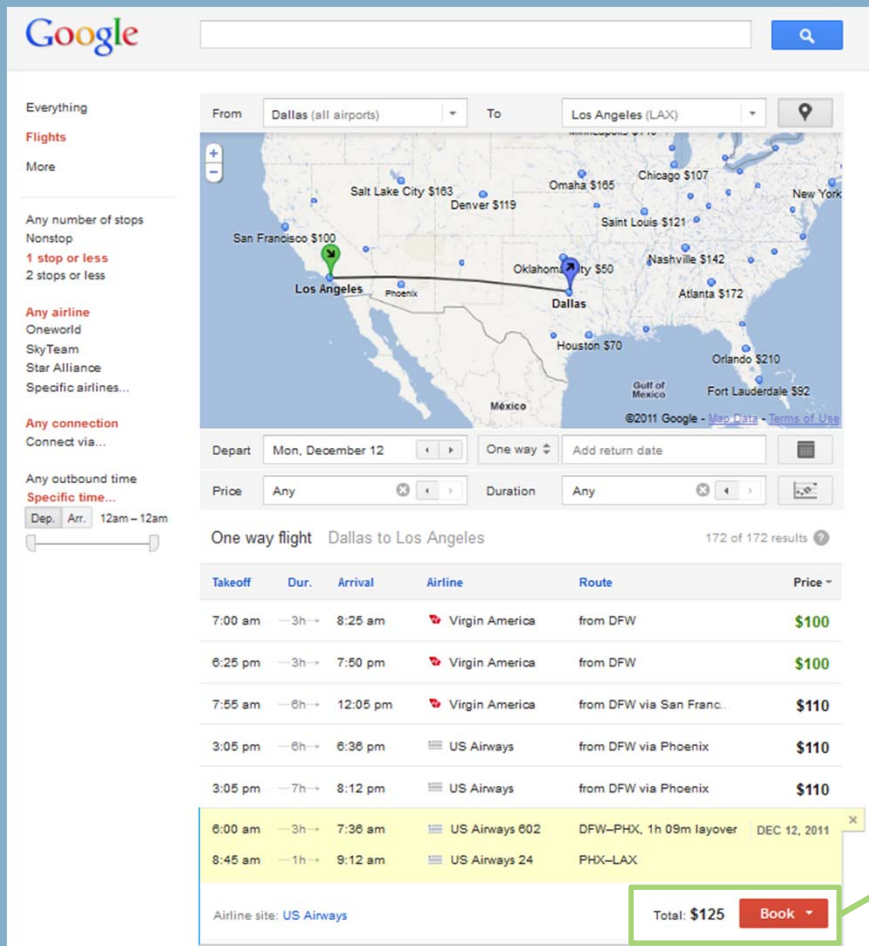
Takeoff	Dur.	Arrival	Airline	Route	Round trip
12:45 am	7h →	11:01 am	Delta	via Minneapolis	43 from \$1,021
12:55 am	8h →	11:51 am	Delta	via Atlanta	14 from \$1,191
5:45 am	8h →	5:13 pm	Delta	via Detroit	20 from \$1,021
6:00 am	5h →	2:27 pm	United		13 from \$925
6:00 am	7h →	4:10 pm	American	via Chicago	11 from \$929
6:00 am	8h →	5:15 pm	United	via San Francisco	1 from \$1,035
6:00 am	9h →	5:47 pm	United, Delta	via Washington	4 from \$990
6:00 am	9h →	6:29 pm	United	via Washington	3 from \$1,015
6:15 am	9h →	5:45 pm	Delta	via Salt Lake City	7 from \$936
6:20 am	8h →	4:59 pm	Delta	via Minneapolis	7 from \$936
6:30 am	5h →	2:53 pm	Delta		21 from \$1,010
6:55 am	8h →	6:24 pm	American, Delta	via Chicago	17 from \$918
7:00 am	5h →	3:25 pm	American		4 from \$2,989
7:10 am	8h →	5:59 pm	Virgin America	via San Francisco	9 from \$1,080
7:15 am	5h →	3:28 pm	JetBlue		5 unknown price
7:25 am	7h →	5:45 pm	Delta	via Salt Lake City	8 from \$1,021
7:30 am	8h →	6:53 pm	US Airways, Delta	via Las Vegas	11 from \$934
7:30 am	9h →	7:00 pm	US Airways, Ameri...	via Las Vegas	7 from \$934
7:40 am	5h →	3:59 pm	Virgin America		6 from \$1,344

According to DOT guidelines, “TO THE EXTENT AN OTA OR GDS ENGAGES IN DISPLAY BIAS, IT MUST CLEARLY AND CONSPICUOUSLY DISCLOSE THAT FACT.”

Show all results including: US Airways, Sun Country, JetBlue from \$874

INCIDENCES OF UNAVAILABLE FARES

In some incidences, Google Flight Search returns fares that are not available on the carriers' sites and actually cannot be booked by consumers.

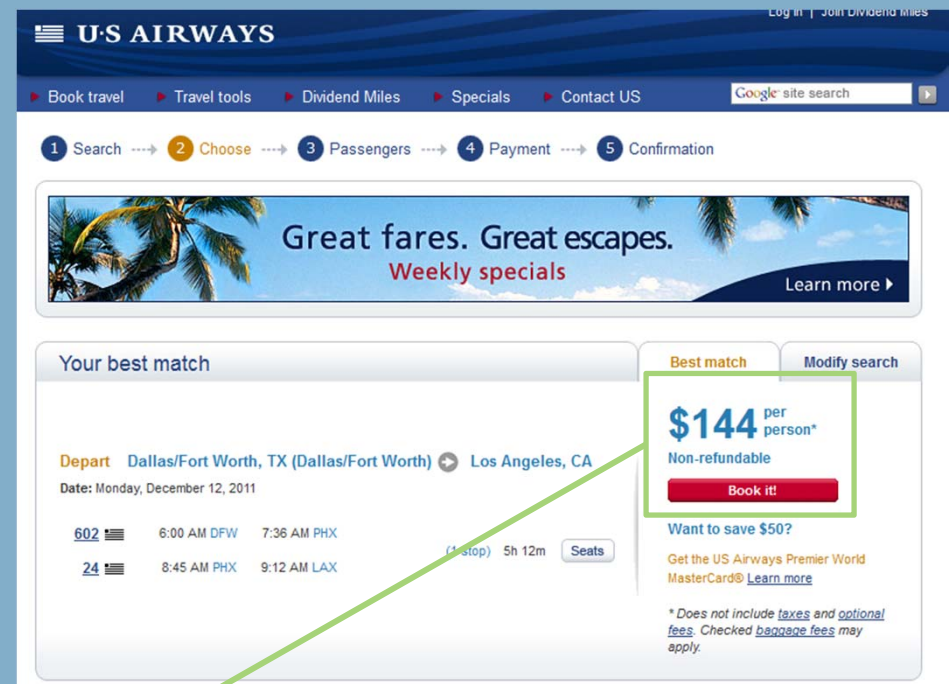


Google Flight Search results for Dallas (all airports) to Los Angeles (LAX). The search shows 172 results. The results table lists flights with their takeoff, duration, arrival, airline, route, and price. A green box highlights the total price of \$125 and a 'Book' button.

Takeoff	Dur.	Arrival	Airline	Route	Price
7:00 am	3h	8:25 am	Virgin America	from DFW	\$100
6:25 pm	3h	7:50 pm	Virgin America	from DFW	\$100
7:55 am	6h	12:05 pm	Virgin America	from DFW via San Franc.	\$110
3:05 pm	6h	6:36 pm	US Airways	from DFW via Phoenix	\$110
3:05 pm	7h	8:12 pm	US Airways	from DFW via Phoenix	\$110
6:00 am	3h	7:36 am	US Airways 602	DFW-PHX, 1h 09m layover DEC 12, 2011	
8:45 am	1h	9:12 am	US Airways 24	PHX-LAX	

Airline site: [US Airways](#)

Total: **\$125** [Book](#)



U.S. AIRWAYS website showing flight details and pricing. The page displays a search for Dallas/Fort Worth, TX (Dallas/Fort Worth) to Los Angeles, CA, departing Monday, December 12, 2011. The best match is a flight for \$144 per person, non-refundable. A green box highlights the 'Book it!' button.

Great fares. Great escapes.
Weekly specials

Your best match

Depart **Dallas/Fort Worth, TX (Dallas/Fort Worth)** to **Los Angeles, CA**
Date: Monday, December 12, 2011

Best match [Modify search](#)

\$144 per person*
Non-refundable
[Book it!](#)

Want to save \$50?
Get the US Airways Premier World MasterCard® [Learn more](#)

* Does not include taxes and optional fees. Checked baggage fees may apply.

POTENTIAL CONSUMER PROTECTION VIOLATIONS?

**GOOGLE'S INITIAL ROLLOUT OF
FLIGHT SEARCH MAY VIOLATE U.S.
DEPARTMENT OF TRANSPORTATION
CONSUMER PROTECTION RULES
THAT ENTITIES SELLING AIR TRAVEL
MUST FOLLOW.**

DISCLOSURE OF CODE-SHARING ARRANGEMENTS

DOT requires that flight information on the first screen must include both the name of the carrier operating the flight and the trade name under which it does business.

The screenshot shows the Kayak website interface. The search parameters are Los Angeles, CA to New York, NY for dates 11/23/2011 to 11/27/2011. The results are sorted by price (low to high). The first result is a \$1190+ fare from US Airways / Delta, with a note "Skywest DBA Delta Connection operates flight 4814." The second result is a \$665 Economy fare from US Airways / Delta, also with a note "Skywest DBA Delta Connection operates flight 4814." The third result is a \$665 Economy fare from US Airways / Delta, also with a note "Skywest DBA Delta Connection operates flight 4814." The fourth result is a \$665 Economy fare from US Airways / Delta, also with a note "Skywest DBA Delta Connection operates flight 4814." The fifth result is a \$665 Economy fare from US Airways / Delta, also with a note "Skywest DBA Delta Connection operates flight 4814." The sixth result is a \$665 Economy fare from US Airways / Delta, also with a note "Skywest DBA Delta Connection operates flight 4814."

Google Flight Search

The screenshot shows the Google Flight Search interface. The search parameters are Los Angeles to New York for dates Wed, November 23 to Sun, November 27. The results are sorted by price (low to high). The first result is a \$1,124 fare from United, with a note "via Cincinnati". The second result is a \$1,124 fare from Delta, with a note "via Cincinnati". The third result is a \$1,124 fare from United, with a note "via Cincinnati". The fourth result is a \$1,134 fare from Delta, with a note "via Cincinnati".

Second Screen Indicates Flight Operator

The screenshot shows the Google Flight Search interface, displaying the second screen of flight details. The search parameters are Los Angeles to New York for dates Wed, November 23 to Sun, November 27. The results are sorted by price (low to high). The first result is a \$1,124 fare from United, with a note "via Cincinnati". The second result is a \$1,124 fare from Delta, with a note "via Cincinnati". The third result is a \$1,124 fare from United, with a note "via Cincinnati". The fourth result is a \$1,134 fare from Delta, with a note "via Cincinnati".

DOT Secretary Ray LaHood underscored the importance of these disclosures for consumers:

“WHEN PASSENGERS BUY AN AIRLINE TICKET, THEY HAVE THE RIGHT TO KNOW WHICH AIRLINE WILL BE OPERATING THEIR FLIGHT.”

CHECKED BAG DISCLOSURES

To assist consumers, DOT requires websites which sell air travel to indicate – on the first page that includes specific fare information – if baggage fees may apply, and how consumers can locate these fees.

From a KAYAK flight search

* Prices are per person and are for e-tickets and include all taxes & fees in USD.

We make every attempt to get accurate prices, however, prices are not guaranteed.

^ The fares displayed in Kayak Banner ads include all taxes and fees for economy class travel and were found by Kayak users in the last 72 hours. Seats are limited and may not be available on all flights and days. Fares are subject to change and may not be available on all flights or dates of travel. Some carriers charge additional fees for extra checked bags. Please check the carriers' sites.

✗ Hacker Fares look for better round-trip deals by combining two tickets issued by different airlines for each direction of travel. Because two tickets will be issued, different rules and policies (for example, for baggage fees, change fees, and refunds) may apply in each direction. Any changes made to one of your tickets will not affect the other ticket (for example, if your initial flight is cancelled by either you or the airline, the other airline with which you booked your return flight is not obligated to issue a refund or change your itinerary). You are responsible for complying with each airline's terms and conditions, which may differ (for example, check-in times and limits on baggage size/weight). Please carefully review the details of each airline's contract before booking, and ensure that you complete the booking requirements for both tickets. Because fares change frequently, please check that both of the listed fares are still available before proceeding with your bookings. If you are traveling internationally, you may need to provide proof that you have a return flight at check in and at immigration. You may want to print both of your e-ticket confirmations before starting travel.

The screenshot shows a Google Flights search for a round-trip from Los Angeles (LAX) to New York (LHR). The search parameters are: Depart: Wed, November 23; Return: Sun, November 27; Price: Under \$1,199 (auto); Duration: Under 6h 55m (auto). The results show 17 of 60 results. The first few results are:

Outbound flight	Los Angeles to New York	17 of 60 results			
Takeoff	Out	Arrival	Airline	Route	Round trip
6:00 am	—Sh—	2:27 pm	United		1 from \$1,124
6:30 am	—Sh—	2:53 pm	Delta		1 from \$1,124
8:05 am	—Sh—	4:30 pm	American		1 from \$1,124
8:15 am	—Sh—	4:35 pm	United		1 from \$1,124
8:30 am	—Sh—	5:06 pm	Delta		1 from \$1,124
11:30 am	—Sh—	8:04 pm	Delta		1 from \$1,124
11:37 am	—Sh—	7:59 pm	United		1 from \$1,124
1:30 pm	—Sh—	9:55 pm	Delta		1 from \$1,124
1:41 pm	—Sh—	9:59 pm	United		1 from \$1,124
1:45 pm	—Sh—	10:05 pm	American		1 from \$1,124
3:40 pm	—Sh—	11:55 pm	Virgin America		6 from \$1,069
4:12 pm	—Sh—	12:29 am +1	United		1 from \$1,124
4:30 pm	—Sh—	12:52 am +1	Delta		1 from \$1,124
9:30 pm	—Sh—	5:45 am +1	Delta		1 from \$1,124
9:30 pm	—Sh—	5:45 am +1	Virgin America		6 from \$1,069
11:30 pm	—Sh—	7:45 am +1	Delta		1 from \$1,124
11:35 pm	—Sh—	7:50 am +1	Virgin America		6 from \$1,069

Show all results including: US Airways, Sun Country, JetBlue from \$574

Try this search on Expedia • Orbitz • Priceline • Travelocity • CheapTickets • Kayak

Google results fail to identify on the first page that bag charges may apply.

**SO WHY WOULD
GOOGLE STEER
CONSUMERS TOWARD
AN INFERIOR FLIGHT
SEARCH PRODUCT?**

GOOGLE BLAMES THE AIRLINES

Jeremy Wertheimer (ITA founder and now Google Vice President of Travel) appeared at the PhoCusWright Travel Conference shortly after the roll-out of Google Flight Search.

Wertheimer confirmed that Google Flight Search would not include online travel agencies such as Expedia, Priceline and Travelocity or metasearch engines like KAYAK in the Flight Search results. **Google Flight Search would only return airline results.**

Google's reasoning?

**“THE AIRLINES DON'T WANT THE
ONLINE TRAVEL AGENTS INCLUDED.”**

WHICH RAISES INTERESTING QUESTIONS: Do all the airlines object to including online travel agents? Or is Google working with a few airlines to exclude the online travel agents, and smaller airlines?

ECONOMIC INCENTIVE TO FAVOR AIRLINES

The screenshot shows the Google Flight Search interface. The search parameters are: From Los Angeles (LAX) to New York (JFK), Depart Wed, November 23, Return Sun, November 27, Price Any (auto), and Duration Under 6h 37m (auto). The results show 21 of 73 results for the outbound flight. The table lists various flight options with columns for Takeoff, Duration, Arrival, Airline, Route, and Round trip price. Airlines listed include Virgin America, Delta, and American. Prices range from \$880 to \$1,613. At the bottom, there is an advertisement banner that says "AD Try this search on Kayak - Priceline - Travelocity - Expedia - Orbitz - Cheapoair".

Takeoff	Dur.	Arrival	Airline	Route	Round trip
Show all results including: US Airways, Sun Country, United from \$880					
10:40 am	5h	7:01 pm	Virgin America		3 from \$996
9:30 pm	5h	5:45 am **	Virgin America		3 from \$996
11:35 pm	5h	7:50 am **	Virgin America		3 from \$996
1:40 pm	5h	10:00 pm	Virgin America		3 from \$1,271
3:40 pm	5h	11:55 pm	Virgin America		3 from \$1,271
7:40 am	5h	3:59 pm	Virgin America		3 from \$1,308
1:30 pm	5h	9:55 pm	Delta		6 from \$1,311
4:30 pm	5h	12:52 am **	Delta		6 from \$1,311
11:30 pm	5h	7:45 am **	Delta		6 from \$1,311
6:30 am	5h	2:53 pm	Delta		6 from \$1,416
8:30 am	6h	5:06 pm	Delta		6 from \$1,416
11:30 am	6h	8:04 pm	Delta		6 from \$1,416
9:30 pm	5h	5:45 am **	Delta		6 from \$1,416
11:05 am	6h	7:35 pm	American		4 from \$1,613
7:15 am	5h	3:28 pm	JetBlue		5 unknown price
9:30 am	6h	6:00 pm	American		4 unknown price
12:15 pm	6h	8:45 pm	American		4 unknown price
12:45 pm	5h	9:00 pm	JetBlue		5 unknown price
1:55 pm	5h	10:08 pm	JetBlue		5 unknown price
3:05 pm	5h	11:19 pm	JetBlue		5 unknown price
8:50 pm	5h	5:04 am **	JetBlue		5 unknown price

Sandra Heikkinen, a Google spokesperson, says: “Like any other partner, Google needs to honor the airline’s distribution decisions. With the Flight Search feature, that means we can only show airlines in the booking links.”

She goes on to say, “We are exploring advertising opportunities within the page to showcase the products and services from other relevant partners, including our OTA and metasearch partners. The new ad format experiment is an example of that exploration.”

AD Try this search on Kayak - Priceline - Travelocity - Expedia - Orbitz - Cheapoair

In other words, this arrangement ensures more ad revenue for Google.

ECONOMIC INCENTIVE TO FAVOR AIRLINES

The screenshot shows the Google Flights interface. The search parameters are: From: Los Angeles (LAX), To: New York (JFK), Depart: Wed, November 23, Return: Sun, November 27, Price: Any (auto), Duration: Under 6h 37m (auto). The results show 21 of 73 results for the outbound flight from Los Angeles to New York. The table lists various flight options with columns for Takeoff, Duration, Arrival, Airline, Route, and Round trip price. The first few results are from Virgin America, followed by Delta, and then American and JetBlue. The prices range from \$880 to \$1,613. At the bottom of the results, there is an advertisement for Kayak, Priceline, Travelocity, Expedia, Orbitz, and Cheapoair.

Takeoff	Dur.	Arrival	Airline	Route	Round trip
Show all results including: US Airways, Sun Country, United from \$880					
10:40 am	5h	7:01 pm	Virgin America	3 from	\$996
9:30 pm	5h	5:45 am **	Virgin America	3 from	\$996
11:35 pm	5h	7:50 am **	Virgin America	3 from	\$996
1:40 pm	5h	10:00 pm	Virgin America	3 from	\$1,271
3:40 pm	5h	11:55 pm	Virgin America	3 from	\$1,271
7:40 am	5h	3:59 pm	Virgin America	3 from	\$1,308
1:30 pm	5h	9:55 pm	Delta	6 from	\$1,311
4:30 pm	5h	12:52 am **	Delta	6 from	\$1,311
11:30 pm	5h	7:45 am **	Delta	6 from	\$1,311
6:30 am	5h	2:53 pm	Delta	6 from	\$1,416
8:30 am	6h	5:06 pm	Delta	6 from	\$1,416
11:30 am	6h	8:04 pm	Delta	6 from	\$1,416
9:30 pm	5h	5:45 am **	Delta	6 from	\$1,416
11:05 am	6h	7:35 pm	American	4 from	\$1,613
7:15 am	5h	3:28 pm	JetBlue	5 unknown price	
9:30 am	6h	6:00 pm	American	4 unknown price	
12:15 pm	6h	8:45 pm	American	4 unknown price	
12:45 pm	5h	9:00 pm	JetBlue	5 unknown price	
1:55 pm	5h	10:08 pm	JetBlue	5 unknown price	
3:05 pm	5h	11:19 pm	JetBlue	5 unknown price	
8:50 pm	5h	5:04 am **	JetBlue	5 unknown price	

Ad Try this search on Kayak - Priceline - Travelocity - Expedia - Orbitz - Cheapoair

As Google founders Sergey Brin and Larry Page wrote while students at Stanford:

“ADVERTISING INCOME OFTEN PROVIDES AN INCENTIVE TO PROVIDE POOR QUALITY SEARCH RESULTS.”

Ad Try this search on Kayak - Priceline - Travelocity - Expedia - Orbitz - Cheapoair

Since online travel agents and metasearch engines are not included in the “organic” results, these sites must purchase Google’s ad space to remain visible to consumers.

ECONOMIC INCENTIVE TO FAVOR AIRLINES

There is another plausible reason for Google to exclude online travel agencies and metasearch providers, which often provide consumers with greater choices and lower priced fare options:

GOOGLE IS MOVING TOWARD A **COST-PER-ACQUISITION (CPA)** ADVERTISING MODEL.

What's the big deal?

A CPA model would mean that Google would get paid when a user purchases a ticket (from the Flight Search page). With a CPA model, Google would receive a percentage of the sale. *(In the past, Google has employed a “cost-per-click” (CPC) model. That means whenever a user clicks on an ad on a Google site, Google gets paid a fixed fee.)*

And if Flight Search ads are being sold as CPA ad units, then Google benefits when consumers pay more for airfare.

ONE STEP CLOSER TO SELLING TICKETS?

During the investigation of Google's acquisition of ITA Software, Google stated that it had no plans to sell airline tickets.

WHAT GOOGLE SAID:

Facts about Google's acquisition of ITA Software

On July 1, 2010, Google announced an agreement to acquire ITA Software, a Cambridge, Massachusetts flight information software company, for \$700 million, subject to adjustments.

- Google's acquisition of ITA Software will create a new, easier way for users to find better flight information online, which should encourage more users to make their flight purchases online.
- The acquisition will benefit passengers, airlines and online travel agencies by making it easier for users to comparison shop for flights and airfares and by driving more potential customers to airlines' and online travel agencies' websites. Google won't be setting airfare prices and has no plans to sell airline tickets to consumers.

But on March 1, 2012, Google announced a new partnership with Cape Air where it would now support “the airline's reservations, inventory control system and departure control system.” That means Google is directly powering the system that sells airline tickets.

Or, as Tnooz put it: “So Google is a search engine, advertising business, browser and mobile operating system developer — and now you can add airline reservations system provider to the mix.”

GOOGLE FLIP-FLOPS ON ONLINE TRAVEL AGENCIES

After the launch of Flight Search, Google defended the omission of online travel agencies stating that “the airlines don’t want the online travel agents included” and “Google needs to honor the airline’s distribution decisions. With the Flight Search feature, that means we can only show airlines in the booking links.”

But on March 15, 2012, Google went back on this promise, adding Orbitz to the Flight Search results.

Orbitz’s inclusion in the results begs several questions: Have the airlines changed their minds? Why is Orbitz the only online travel agency in the results? Is excluding other online travel agencies and metasearch sites that provide transparency and choice really in the best interest of consumers?

At the same time, Google added international flights to Flight Search (as the European Union continues its investigation into Google’s conduct).

The screenshot shows the Google Flight Search interface. The search parameters are: From: Washington (all airports), To: Las Vegas (LAS), Depart: Sat, March 31, Return: Wed, April 4. The results show 15 of 132 results. The first section lists flights from Washington to Las Vegas, including options from Frontier, United, and US Airways. A pop-up window shows the total price of \$719 and a 'Book' button. The second section lists flights from Las Vegas to Washington, including options from Frontier, United, and US Airways. A pop-up window shows the total price of \$719 and a 'Book' button.

Takeoff	Dur.	Arrival	Airline	Route	Round trip
Show all results including: US Airways, Alaska, Virgin America from \$535					
6:15 pm	4h	8:12 pm	Frontier 837	DCA-DEN, 1h 13m layover	MAR 31, 2012
9:25 pm	2h	10:20 pm	Frontier 769	DEN-LAS	
8:10 am	2h	10:57 am	Frontier 531	LAS-DEN, 43m layover	APR 4, 2012
11:40 am	3h	4:54 pm	Frontier 724	DEN-DCA	

Airline site: Frontier Total: \$719 Book

Takeoff	Dur.	Arrival	Airline	Route	Round trip
7:51 pm	5h	10:09 pm	United	from	1 adult
8:45 pm	5h	10:57 pm	US Airways	from	Orbitz incl taxes & fees \$719
5:45 am	7h	9:43 am	US Airways	from	Frontier incl taxes & fees \$719

WHAT EXPERTS ARE SAYING

With Google Flight Search, “[consumers] are not going to get an impartial search result with multiple choices like a traditional OTA, but instead are likely to end up with a limited menu of options, as dictated by the airlines.”

Joseph Rubin, president of the Interactive Travel Service Association
in a guest post on [Tnooz](#) 12/7/11

“I can’t imagine this breathtaking dominance escaping the attention of regulators much longer. But if it does — if Google takes over travel — there could be serious and long-lasting consequences that could harm consumers and businesses. Imagine what might happen to an airline or hotel company that disagrees with the way Google prices its products when it holds a commanding market share in travel? It could be cut off from millions of customers with a single keystroke. What if Google knocks off one or two online travel agencies, or a company such as Kayak, which searches multiple sites for flights? **Where do we go when our only viable option is Google? What would happen to innovation when one company controls so much?**”

Chris Elliott, consumer advocate and nationally syndicated columnist in the [Washington Post](#) 1/4/12

Google Flight Search, at first only providing glimpses of itself if one searched for it has now come front and center. If anyone had any doubt that Google is skewing its “search” results to help itself, there cannot be any doubt now...Under the guise of airline search, Google is presenting self-serving results with the intent to put competitors, who once paid them for ads based on search, out of business. Worse, the Google Flight Search result that sits at the top of the faux search results isn’t even labeled “advertisement,” which it sure as heck is. **Consumers are being misled today and tomorrow, after Google puts competitors out of business, they will find themselves being fleeced.**

[Consumer Travel Alliance](#) 12/19/11

Google Flight Search is “limiting consumers’ knowledge. This is a situation where Google is trusted as a ‘search engine’ that goes across the whole Web, but it is only going to a small select group of airlines and including them in Flight Search...**Google and the airlines have a sweetheart deal with each other, and the consumers are getting screwed.**”

Charlie Leocha, director of the
Consumer Travel Alliance to [Travel Weekly](#) 12/4/11

WHAT DOES IT MEAN FOR CONSUMERS?

HIGHER PRICES
FEWER CHOICES
LESS INNOVATION

And it's not just in travel search...

GOOGLE'S BEHAVIOR HARMS CONSUMERS

Google's abuse of its monopoly power harms competition and consumers in multiple ways.

ADVERTISERS: Advertisers pay ever-higher fees to Google and have little choice but to accept Google's arbitrary terms.

WEBSITES AND CONTENT CREATORS: Websites lose traffic when Google steers users to its own or preferred partners' sites. This means competitors have to increase their advertising spend on Google to try to make up for that lost traffic.

WHY SHOULD I CARE?

CONSUMERS: Consumers are misled by Google's manipulated search rankings and deceptive and preferential display of its own sites in response to users' queries. More broadly, consumers pay more for goods and services because advertisers are paying more to Google and because of diminished competition among websites. Further, Google's exclusionary conduct denies revenue and traffic to sites that compete with Google, hindering the ability of those sites to bring more innovative online content and better services to consumers.

NOT TO MENTION...

GOOGLE THREATENS:

THE FUTURE OF THE INTERNET

Google's control over access to information on the Internet threatens both existing and new Internet businesses.

Simply put, Google's market power and anticompetitive practices inhibit other Internet businesses from competing by denying those companies the user traffic and revenue they need to develop new products, support innovation, create jobs, and foster economic growth.

For those who are unable to win Google's favor or those seeking to enter Internet commerce, Google's practices present a barrier to entry and an obstacle to competing on the merits.

**WHICH AGAIN
HARMS:**

CONSUMERS!

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