



May 31, 2024

Mr. Sundar Pichai
Chief Executive Officer
Google, Inc.
1600 Amphitheatre Parkway
Mountain View, CA 94043

Re: Impacts of Google's Recent Site Reputation Abuse Policy Rollout

Dear Mr. Pichai,

I am writing to you on behalf of the News/Media Alliance ("N/MA") to express serious concerns regarding Google's recent changes to its spam policy and its harmful effects on newspaper, magazine, and digital publishers. N/MA represents over 2,200 diverse newspaper, magazine, and digital media publishers in the United States and Europe, ranging from the largest news and magazine publishers to hyperlocal newspapers, and from digital-only outlets to papers who have printed news for centuries.

The drafting and implementation of the new "Site Reputation Abuse" policy – without any meaningful consultation or discussions with affected publishers – has been uninformed, haphazard, and market abusive, leading to the deranking or deindexing of whole sections of substantively valid and reader-valued publisher properties ranging from coupon and affiliate link pages, to sports betting, lottery, and gaming content. We call upon Google to pause the implementation of the new policy and to work together with publishers to revise the policy, provide adequate due process, and a mechanism for first party oversight over implementation of any policy. These changes are needed to allow publishers to continue to serve their readers and local businesses by providing valuable content and information.

Although the "Site Reputation Abuse" policy makes exceptions for "coupons that are listed with close involvement of the hosting site", "[t]hird-party content...that's produced with close involvement of the host site, where the purpose is to share content directly to readers" and "[e]mbedding third-party ad units throughout a page or using affiliate links throughout a page" – seemingly aimed to protect responsible publishers, readers, and retailers alike – the unilateral implementation, commenced on May 5, has been indiscriminate, overzealous, and harmful. Instead of applying its policy properly and in accordance with its own guidelines, or communicating in advance with affected publishers, Google has manually deranked and deindexed numerous publisher coupon and promotional pages, and articles related to sports betting, iGaming and lottery content. The affected sites include Los Angeles Times, with full time staff dedicated to selecting promotion codes, USA Today, which exercises comprehensive oversight over its couponing material, and several regional and local journalism mastheads, such as Nj.com and Mlive.com that serve their communities by developing digital offerings covering local sporting content. In short, the implementation of this new policy –by fiat, without adequate notice or opportunity to "cure" – has been highly disruptive and harmful to the detriment of readers, businesses, publishers, and more broadly, the open internet.



The “Site Reputation Abuse” policy poses a fundamental threat to far too many publishers who have no choice but to rely on revenue affected by this policy in a search market dominated by Google. N/MA’s members have regularly included coupons in their publications for the past century, and such promotions form an important part of our community lives, providing local businesses an efficient and trusted way to attract new and retain existing customers, while helping families ease their financial burden. Meanwhile, with the proliferation of lotteries and legalized sports and iGaming betting, publishers have responded to reader demand for quality responsible content on these topics by making it available online as part of the digital transformation. Additionally, affiliate links often direct readers to pages with related and important content, such as, for example, independent product reviews. Together, the revenue from these properties are vital to support continued investments in high-quality journalism that keeps our communities informed, engaged, and entertained. As such, while the policy’s exceptions seemingly already protect this content, they should at a minimum be updated to expressly reference valid publisher first-party content such as articles relating to sports betting, iGaming and lottery content, to ensure future protection for publishers.

To make the situation worse, Google has not adequately prepared to address escalations and appeals resulting from the blunt implementation of the new policy. Some publishers have had requests for reconsideration abruptly rejected without real engagement or rationale, while other properties are locked into Google’s appeals process with no insight into when the appeal will be decided or the guidelines for such decisions. Meanwhile, they continue to suffer the effects of the unexpected and unjustified deranking. This abuse of power is contributing directly to immediate revenue drops in the short term, and publishers that are providing a vital service with limited resources should not be required to shoulder the costs until Google decides to act. It is therefore vital that, while the situation gets resolved, Google release any affected N/MA member properties from the purgatory of its internal appeals process and reverse any deranking or deindexing decisions taken against them under the new policy.

We call on you to promptly engage with us to revise the policy and its implementation strategy to ensure that it achieves its presumed goals – to reduce the amount of low-quality information online, while preserving readers’ access to reliable and trustworthy content. We stand ready to work together to resolve this serious issue and look forward to your response.

Sincerely,



Danielle Coffey
President & CEO
News/Media Alliance

