



## **SUBMISSION TO THE FUTURE OF MEDIA COMMISSION - JANUARY 2021**

Google welcomes the opportunity to provide comments as part of the Future of Media Commission's public consultation. We commend the government's initiative in establishing an expert body of this type to consider the wide range of issues currently facing public service media in Ireland and look forward to engaging further with the Commission's work as it develops. The Commission has a broad remit which addresses a number of aspects of the current media landscape, including print, broadcast and online media. In this submission we focus on the news media and in particular the challenge of maintaining availability and access to public service news in a constantly evolving landscape.

Google has a strong interest in supporting a diverse and sustainable news ecosystem. In this submission, we describe how Google supports public service news by providing digital tools that increase access to information for consumers and help publishers develop, distribute, and fund news content. We then describe the efforts Google has undertaken to provide additional support in the form of funding, training, tools, and guidance for those who create and publish public service news content. We also answer some common questions about our products and services.

We conclude this submission with a set of recommendations for the Future of Media Commission ("Commission") to consider as it develops proposals to support public service news. Google appreciates the opportunity to provide this submission to the Commission and we look forward to working with the Commission and other stakeholders to create an environment in which diverse, high-quality journalism can continue to thrive.

## **Introduction**

We all benefit from high quality, impartial, independent journalism. Public service news informs people about important matters, whether local, national, or global. High-quality and diverse news media play a significant role in supporting the effective functioning of a democratic society, by fostering the wide production and dissemination of a range of information, opinions, and arguments. News helps us find out what is going on in the world and our local communities, while enabling us to debate and understand key issues of the day.

At Google, we are proud to play a part in connecting users to diverse sources of quality public service news. Our mission is to make the world's information universally accessible and useful. Tools such as Google Search enable people to find diverse sources of news and to investigate and debunk mis- and disinformation. That is why we share a strong interest in supporting a diverse and sustainable ecosystem of quality news providers. As part of this, we recognise that

helping the news industry adapt and thrive in the evolving information marketplace is a shared responsibility and a civic duty.

It is clear that the news industry is changing. New tools and technologies have enabled more voices to engage in journalistic endeavours and increased the breadth and depth of news coverage. People can access diverse perspectives and are no longer limited to the newsgathering perspectives of a few key broadcasters or publishers. These advances in technology and the growth of the Internet changed consumer behavior in a way that has created both opportunities and challenges for the news ecosystem. However, this is not the first time that the news industry has undergone major shifts in consumption and distribution. Radio and television presented new challenges and opportunities in the 20th century and the news industry successfully adapted to and embraced those technologies. We believe that, with the support of our governments and citizens, the Irish news industry can do the same with the Internet.

## How Google Supports Public Service News

Since 1998, Google's mission has been to make the world's information universally accessible and useful. Connecting users to public service news and supporting the news industry is an important element of this mission. A robust news industry informs people in Ireland and around the globe about the environmental, social, and political challenges we face. News holds individuals and organisations to account and presents stories that inspire all of us to be better citizens.<sup>1</sup> For nearly two decades, Google has worked collaboratively with partners in the news industry and provided tools, platforms, and resources to develop, distribute, fund, and access news. In this section, we describe these tools, services, resources, and initiatives.

### 1. Helping news publishers reach audiences around the world

Google is proud to have developed tools that help people in Ireland and all over the world find relevant, authoritative news about issues that matter--from local affairs to geopolitics. **Google Search and Google News**, for example, drive billions of interactions with publisher content globally. Today, Google connects users to publishers' websites more than 24 billion times per month. Google is also leading the effort to promote consumer engagement with news by developing tools to build online trust and highlight reputable news sources. For example, we have worked to elevate original reporting<sup>2</sup> in Search and improve the organisation of top stories<sup>3</sup> to help people better orient themselves around a topic and easily explore related ideas.

Google Search has always included links to news articles in its results, driving traffic to publisher sites, and over the years we have invested in new products and features to better connect

---

<sup>1</sup> <https://blog.google/around-the-globe/google-europe/supporting-quality-journalism-europe/>

<sup>2</sup> <https://blog.google/products/search/original-reporting/>

<sup>3</sup> <https://www.blog.google/products/search/smarter-organization-top-stories-search/>

publishers with consumers. In 2002, Google launched Google News to help users find the latest and developing news on important events across a variety of sources in a fresh, relevant, and authoritative format. Today, when users enter news related keywords into Google Search, Google surfaces as a top result a carousel of relevant news stories from reputable publishers, each of which links to a publisher's page where the publisher can present its articles and advertisements, and encourage readers to further engage with their content. In Europe alone, people click on the news content Google links to more than eight billion times a month — that means we drive 3,000 clicks per second to publishers' own websites.<sup>4</sup> For larger news publishers, a study by Deloitte put the value of each click between 4-6 euro cents, mostly generated through advertising and subscriptions.<sup>5</sup>

Since then, we have continued to collaborate with the news industry to help tackle new challenges they face in the digital environment. With the rise of mobile devices, apps, and social platforms in the early 2010s, publishers had difficulty offering compelling mobile experiences. At the time, mobile web pages took an average of 19 seconds to open. Publishers had to not only learn how to design content for mobile, but also how to evolve their business model quickly. After discussions with European publishers, we partnered with the industry to develop an open mobile standard that eventually became the **Accelerated Mobile Pages (AMP)** framework. Because users are less likely to abandon pages that load faster, AMP has helped drive more traffic to news sites. With AMP the publisher controls every aspect, from content presentation to the underlying business model. There are no license fees for AMP and all traffic data goes directly to the publisher. They can ensure the pages appear under their URL, even when the page is loaded from an AMP cache.

## 2. Supporting online revenue streams for publishers

Google also has tools and services to help news publishers generate income from their content, whether through driving free traffic to their sites, showing digital advertising, or increasing reader subscriptions.

Google offers two different advertising products to help publishers do what they have long done — generate revenue by displaying advertising alongside their content. The first is **Google AdSense**, which helps small and medium publishers worldwide monetise their websites. AdSense is a free, simple product that shows relevant and engaging ads to site visitors and even customises the look and feel of ads to match the publisher's site. In Ireland, websites of all types use Google AdSense, from food blogs such as easyfood.ie to local radio stations such as radiokerry.ie and local newspapers such as mayonews.ie.

---

<sup>4</sup> <https://blog.google/around-the-globe/google-europe/supporting-quality-journalism-europe/>

<sup>5</sup> Deloitte, The impact of web traffic on revenues of traditional newspaper publishers: A study for France, Germany, Spain and the UK (available Sept. 2019). Google commissioned this study by Deloitte to measure the impact of web traffic on newspaper publishers' revenues in France, Germany, Spain, and the UK.

The second is **Google Ad Manager** for publishers with sophisticated digital advertising businesses.<sup>6</sup> Leading News publishers and broadcasters in Ireland such as the Irish Times, Independent News & Media and the Journal are among the thousands of news publishers around the world that use Ad Manager to run digital advertising on their websites and apps. News organisations tell us they choose Ad Manager for its performance, controls, and ability to integrate with hundreds of third-party advertising technologies. Ad Manager helps publishers earn revenue for the ad space they sell. And they retain the majority of the revenue — in fact, on average, the top 100 news publishers globally keep over 95 percent of the digital advertising revenue they generate when they use Ad Manager to display ads on their websites.<sup>7</sup> Google invests a large part of the portion we keep in running this business, including the development and maintenance of data centres around the world, advancements in machine learning, and product innovations that increase publisher revenue and contribute to the open web.

Google also works with publishers to make it easier for users to access premium content using their Google accounts. Through the service **Subscribe with Google**, we streamlined the process for users who wish to access paid content published on platforms for which the users have not yet subscribed.<sup>8</sup> Subscribe with Google allows individuals to access paid news platforms with just a few clicks or taps, leveraging the contact and payment information associated with their Google accounts. The streamlined process reduces friction and leads to more subscriptions. Users are able to access their subscription content anytime they are signed in with their Google Accounts. Google also presents users with a dedicated Google News section that displays content from the sources to which they subscribe, helping users get the most value out of their subscriptions and highlighting content from the publications they support. Publishers receive 95% of revenue when the subscription is sold on a publisher’s website and 85% of revenue when the subscription is sold in the publisher’s Android app. Publishers can also directly manage the customer relationship.

### 3. Continuing to invest in deepening consumer engagement

In June 2020, Google announced **Google News Showcase**, a new licensing programme through which Google will directly pay publishers to curate high-quality content for an innovative news experience.<sup>9</sup> Google News Showcase provides an enhanced storytelling experience that provides deep dives into complex stories. The programme is the product of extensive discussions between Google and publishers throughout the world. We have committed to spend USD1 billion on the programme in the first three years. So far more than 400 publications have signed up including European national and local news publications. Google intends to bring

---

<sup>6</sup> <https://blog.google/products/admanager/news-publishers-make-money-ad-manager/>

<sup>7</sup> This analysis reflects the average fees retained by Ad Manager, and does not include fees that may be paid to third-party ad networks and exchanges operated by companies other than Google. See:

<https://blog.google/products/admanager/news-publishers-make-money-ad-manager/>

<sup>8</sup> <https://blog.google/outreach-initiatives/google-news-initiative/introducing-subscribe-google/>

<sup>9</sup>

<https://www.blog.google/outreach-initiatives/google-news-initiative/licensing-program-support-news-industry/>

Google News Showcase to Ireland in 2021 and will begin outreach and discussions with Irish publishers in the coming months.

## 4. Creating additional initiatives to support innovation and high quality journalism

In addition to offering products that help news organisations earn revenue and connect with users, Google contributes significant financial resources to support the news industry. Through the **Digital News Innovation Fund** (“DNI Fund”), the **Google News Initiative**, and most recently, the **Journalism Emergency Relief Fund**, Google provides financial and technical support to public-interest news organisations in Ireland, throughout Europe, and around the world. We detail some of these initiatives below as they may be of interest to the Commission as it considers mechanisms to support further innovation in the news ecosystem.

### Digital News Innovation Fund

In 2015, Google’s DNI Fund set out to help drive innovative projects in Europe that could boost the news industry and establish new models for online news delivery.<sup>10</sup> The DNI Fund laid the groundwork for the implementation of new business models<sup>11</sup> and structures along the entire value chain – from content workflow processing,<sup>12</sup> to digital distribution,<sup>13</sup> to go-to market strategy for new news products and monetisation. The DNI Fund helped nine organisations in Ireland, including The Irish Times, which used the funds to develop content for Irish readers outside of Ireland who are interested in maintaining a connection to current affairs in Ireland. One funded organisation, Journal Media, used funding to develop Noteworthy.<sup>14</sup> Noteworthy is a crowdfunding site that supports coverage of sensitive issues that advertisers may not wish to have associated with their brands (e.g. news coverage of child trafficking, sexual assaults, and gambling issues). Such reporting serves the public interest, but advertisers may be reluctant to have ads promoting their products placed in proximity to coverage of sensitive issues.

### Google News Initiative

Helping publishers to adapt to become sustainable news media businesses in the Internet era was an important motivation behind our creation of the Google News Initiative (“GNI”) in 2018.<sup>15</sup> GNI has worked with organisations of all sizes from around the world. GNI’s Digital Growth Program<sup>16</sup> helps publishers tackle specific business challenges, such as growing online audiences and building revenue streams. GNI’s News Consumer Insights<sup>17</sup> tool has helped

---

<sup>10</sup> <https://newsinitiative.withgoogle.com/dnifund/>

<sup>11</sup> <https://newsinitiative.withgoogle.com/dnifund/dni-projects/?category=34> ;  
<https://newsinitiative.withgoogle.com/dnifund/dni-projects/?category=68>

<sup>12</sup> <https://newsinitiative.withgoogle.com/dnifund/dni-projects/?category=42>

<sup>13</sup> <https://newsinitiative.withgoogle.com/dnifund/dni-projects/?category=47>

<sup>14</sup> <https://www.noteworthy.ie/>

<sup>15</sup> <https://newsinitiative.withgoogle.com/about/>.

<sup>16</sup> <https://newsinitiative.withgoogle.com/digital-growth/>.

<sup>17</sup> <https://newsinitiative.withgoogle.com/training/datatools/>.

thousands of newsrooms in nearly 130 countries with data-driven insights designed to increase user engagement and revenue. Since launch, 1,940 Irish journalists and journalism students have taken part in free Google News Lab workshops to help strengthen their digital skills - with a focus on research, visualisation and online verification. In addition, the GNI has helped leading Irish newsrooms provide a paid summer Fellowship for Irish journalism students. GNI's support of public service news has included partnerships with Borealis Philanthropy, supporting a fund that has awarded USD2.3 million in grants to news organisations serving communities of colour,<sup>18</sup> and First Draft, a global nonprofit that has provided journalists with resources to combat misinformation.<sup>19</sup>

## Journalism Emergency Relief Fund

Google's commitment to the news industry continues to evolve and respond. The global spread of SARS-CoV-2 in 2020 led to a significant downturn in advertising revenue that some local news organisations have long relied on, even as the need for authoritative local news and information increased.<sup>20</sup> In response, Google launched a global Journalism Emergency Relief Fund to support small and medium-sized news organisations that produce original news for local communities.<sup>21</sup> Through the initiative, Google has provided USD40 million in funding to more than 5,700 newsrooms in 115 countries, including 36 newsrooms in Ireland. The money is being applied in diverse and creative ways, from ensuring basic reporting needs and giving emergency stipends to allow reporters to cover the crisis, to driving audience engagement and generating subscriptions. In Ireland, the funds have been used by Journal Media to support their work to counter misinformation on COVID-19 and by the Western People to develop a digital offering for their community.

## Google's Role in the News Ecosystem

In this section, we hope to clarify how we organise search results, how we link to news content, and how we both pay and drive value to the news industry.

### How does Google Search organise information?

Every time you search there are potentially millions of web pages that might answer your query. Web crawlers gather information from across hundreds of billions of webpages and organise it in a Search index. We rank those pages based on not one but a whole series of algorithms, guided by a commitment to provide you with the most useful results in response to your query. We're constantly improving our algorithms to return better results & launch around 3,600

---

<sup>18</sup>

<https://borealisphilanthropy.org/racial-equity-in-journalism-fund-awards-2-3-million-to-news-organizations-led-by-and-for-communities-of-color/>.

<sup>19</sup> <https://newsinitiative.withgoogle.com/impact/#combating-misinformation>.

<sup>20</sup>

<https://www.journalism.org/2020/10/29/coronavirus-driven-downturn-hits-newspapers-hard-as-tv-news-thrives/>.

<sup>21</sup> <https://newsinitiative.withgoogle.com/journalism-emergency-relief-fund/>

changes to our ranking systems every year. While we build systems to prevent people from gaming the results, we do provide detail about the principles behind our algorithms and guidelines around how they operate.<sup>22</sup>

## How does Google provide access to news content?

Google doesn't "use" news content, we link to it just as we link to every other page on the web, such as personal blogs, online shops or business websites. This is how every other search engine and the internet at large works. Every time someone searches Google, we provide links to thousands, sometimes millions, of web pages with helpful information. When they are looking for news, those pages could be from a large traditional news publisher or a new digital outlet. Our job is to connect users with the most relevant information. Publishers have always been able to control whether and how they want links to appear on Google, but generally publishers want to be discovered by people who come to Google because of the value they derive from that traffic.

## Does Google pay for news and drive value to the news industry?

Google links to news, and helps drive millions of readers to publishers' sites and apps for free—rather than carrying news articles ourselves. That creates a huge opportunity for publishers to turn those readers into loyal subscribers or show ads. In addition, we are always working to find new ways to support and work with the news industry. For example, Google is now paying publishers to produce a curated experience within Google News Showcase and as a part of this programme we will also pay to provide people with free access to a limited number of premium articles on a publisher's site, if they use a paywall. We have also looked for ways to support and develop new and nascent areas of the news industry's transformation to new media. For example, we worked with a number of creators of audio news content to build customised news streams that combined important, timely news updates with reporting on topics of strong personal relevance.<sup>23</sup>

## Further Opportunities To Support Sustainable Public Service Journalism

As described above, Google has provided substantial resources to support the creation and distribution of public service news. Google's tools help users connect with publishers and help publishers generate revenue to sustain their operations. Google has also provided news organisations and journalists with funding, training, guidance, and tools to help them adapt to digital markets and address emerging challenges. However, the current challenges facing public service news will require Government, industry, and civil society to work together to support public service news organisations as they adapt to the digital age.

---

<sup>22</sup> <https://www.google.com/search/howsearchworks/>

<sup>23</sup> <https://www.blog.google/products/news/collaborating-future-audio-news-assistant/>

Quality public service journalism is essential to a democratic society. Creating an environment in which such journalism can survive, thrive, and reach a wide audience is a proper focus of government attention. Google supports the efforts of the Future of Media Commission to understand the challenges facing public service news and to provide recommendations for action. We believe that the Commission's recommendations should acknowledge that public service news benefits the entire community, and that the responsibility for creating a path to sustainability for public service news should be shared by both private and public actors.

## How we can continue to support public service news

In the course of working with news partners over the years, we have learned that while important, the shift to digital cannot happen overnight, nor is it a silver bullet solution to the challenges the news industry faces. For example, public service news organisations and traditional media outlets often need months or even years of hard work and investment to attract and develop digitally minded talent, adopt data-driven solutions, and build business models that can easily adapt. That is why a successful and comprehensive path forward for the Irish news ecosystem will likely involve many different players and a range of solutions.

Market-based solutions, such as Google News Showcase, are one significant way to help address some of these challenges. While commercial partnerships can be useful to help foster digital transition or innovation, certain challenges may also provide an important justification for novel public funding mechanisms to sustain high quality journalism. While there are many possible ways to do this because different mechanisms may make sense for different circumstances, we do think some common principles can help guide collaboration towards solutions:

- 1. Proposals should be forward-looking, embracing innovative business models that will support high quality journalism, media plurality and diversity, and increased access to information created by digital markets**
- 2. Proposals should be supported by independent and thorough economic analysis**
- 3. Government and other Irish stakeholders should seek to create a framework to help support the public service news ecosystem that is fair, transparent, predictable, and free from political manipulation.**
- 4. Proposals should protect the unprecedented openness and innovation on the web that has increased free expression and access to information around the world.**

The Commission's recommendations should aim to support public policies that help to create a sustainable environment for public service content and should consider how to help news organisations adapt to and thrive in 21st century markets, rather than seeking to preserve legacy structures and business models designed for the pre-digital age. We therefore



encourage the Commission to adopt recommendations that seek to maintain the competition, flexibility, and innovative drive that has long sustained both public service news and the Internet.

## Conclusion

Google is committed to supporting an ecosystem in which a diverse set of public service news voices can thrive and contribute to democratic discourse. We appreciate the opportunity to engage with the Commission as it considers recommendations for the Irish Government and we look forward to continuing the conversation. We are happy to provide any additional information that may be helpful as the Commission develops its recommendations.