



William J. Baer
Assistant Attorney General
Antitrust Division
Department of Justice
950 Pennsylvania Ave, NW
Washington, DC Re:

June 12, 2013

Oppose Google's acquisition of Waze

Dear Assistant Attorney General Baer:

I am writing on behalf of Consumer Watchdog to urge you to block Google's just announced \$1 billion acquisition of Waze, developers of a mobile mapping application, on antitrust grounds if Department of Justice is the agency that ultimately reviews the deal. I understand that the value of the acquisition is substantially above the threshold requiring regulatory approval and could be reviewed by either the DOJ or the Federal Trade Commission. It is not clear to me which agency will scrutinize the deal, so I wanted to express Consumer Watchdog's concerns to both agencies as soon as possible.

Google already dominates the online mapping business with Google Maps. The Internet giant was able to muscle its way to dominance by unfairly favoring its own service ahead of such competitors as Mapquest in its online search results. Now with the proposed Waze acquisition the Internet giant would remove the most viable competitor to Google Maps in the mobile space. Moreover, it will allow Google access to even more data about online activity in a way that will increase its dominant position on the Internet.

Waze CEO Noam Bardin, publicly described Google as his only competitor at last May's All Things Digital conference. He said, "What search is for the Web, maps are for mobile... We feel that we're the only reasonable competition to [Google] in this market of creating maps that are really geared for mobile, for real-time, for consumers — for the new world that we're moving into."

<http://www.forbes.com/sites/markrogowsky/2013/06/09/if-wazes-ceo-is-right-google-wont-be-allowed-to-buy-his-company/>

The FTC's approval of the DoubleClick acquisition tipped Google to a search advertising monopoly, by giving Google most all of the users, advertisers and website publishers that Google did not have. The Commission's approval of the acquisition of the mobile advertising company AdMob extended Google's monopoly to mobile. The Internet giant now has a 93% share of mobile online advertising.

You should take Bardin at his word. Approval of the Waze deal can only allow Google to remove any meaningful competition from the market. It will hurt consumers and hinder technological innovation. If the acquisition comes before the you, I urge you to reject it in the strongest possible terms.

Sincerely,

A handwritten signature in black ink, appearing to read "John M. Simpson".

John M. Simpson
Privacy Project Director