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Dear Vice-President, dear Margrethe,

ahead of the gatekeepers' designation decisions under the DMA by the Commission, I would like to draw your attention to some thoughts, partially already shared with you and your staff in the past:

i) when an online mapping service works as an online search tool where users can enter a keyword (i.e. 'restaurant' or 'gas') to find the results on the map with all the essential information (name, address, phone number, opening hours, etc.) it should be considered an online search engine. Furthermore, as a search engine, it would then comply with the obligations of article 6(12) (FRAND conditions), which are essential for any type of online search.

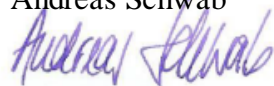
For sure, there is also the possibility of thinking about the adoption of a delegated act to extend the obligations for search engine services to other CPS as foreseen in article 12(2) lett. b);

ii) there are some online services that could fall under more than one category of CPS due to their various functionalities: they can be considered social networks or video sharing platforms or, due to the possibility for a user to buy products directly from the platform, they could also be considered as marketplaces (i.e. TikTok). Economically speaking, it would be more interesting because it would also be subject to the obligations envisaged for intermediation services/marketplaces;

iii) apparently, seven companies will be designated as first bunch of gatekeepers, but it seems that not all of their online services meet the quantitative thresholds of article 3(2). For those, I look forward to seeing carry out the qualitative assessment under article 3(8) to take into consideration already existing antitrust concerns (cloud services);

Kind regards,

Andreas Schwab



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