Who benefits from Google's SERP? The impact of the DMA on the Air Travel Market

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Workshop on the Economics of the Digital Markets Act (DMA)
Brussels, September 22-23, 2025

Digital Markets Act (DMA)

- EU regulation to keep digital markets fair and contestable
 - Approved EU: Sep 2022
 - Start Applying: May 2023
 - Enforced: March 7, 2024
- Targets large digital platforms (gatekeepers) with strong economic position, significant user base in the EU, and durable market power: Amazon, Apple, Booking, Facebook, Google or Microsoft
- Imposes obligations: no self-preferencing, allow interoperability, data portability, no unfair lock-in
- We focus on **Art. 6(5)**, which bans self-preferencing in ranking, indexing, and results display. This directly affects Google: Google Shopping; Google Hotels; Google Maps; **Google Flights**
- Response: Google changed its SERP in March 6, 2024

What do we do?

- Analyze effects of Google SERP's redesign in the EU air travel market
- Three players compete for search traffic

Airlines

American Airlines

Lufthansa

Iberia

LATAM

Air France

Aggregators

Google Flights
Skyscanner
Kayak
Momondo
Wego

OTAs

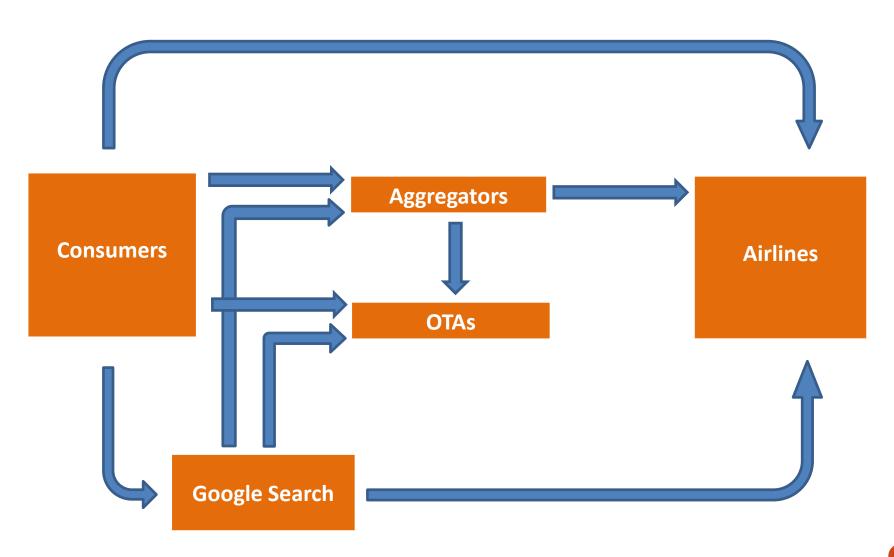
Booking
Expedia
eDreams
Orbitz
TravelPirates

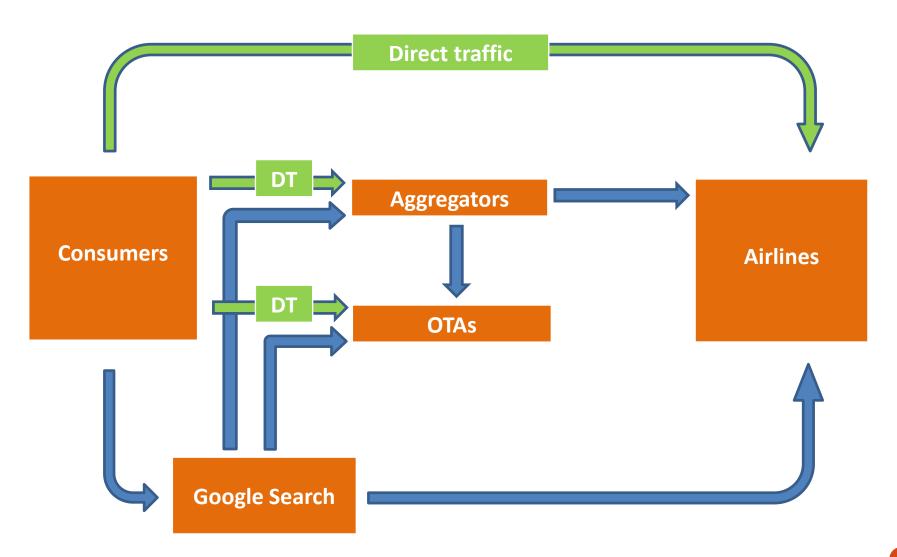
- What do we do? DiD model comparing organic search traffic in the EU (France, Germany, Italy and Spain) and in UK/US, before and after the redesign of Google's SERP in March 6th 2024.
- What do we find? Small low cost airlines and Aggregators/OTAs sites receive more organic search traffic. No effect on large Agrgegatos/OTAs.

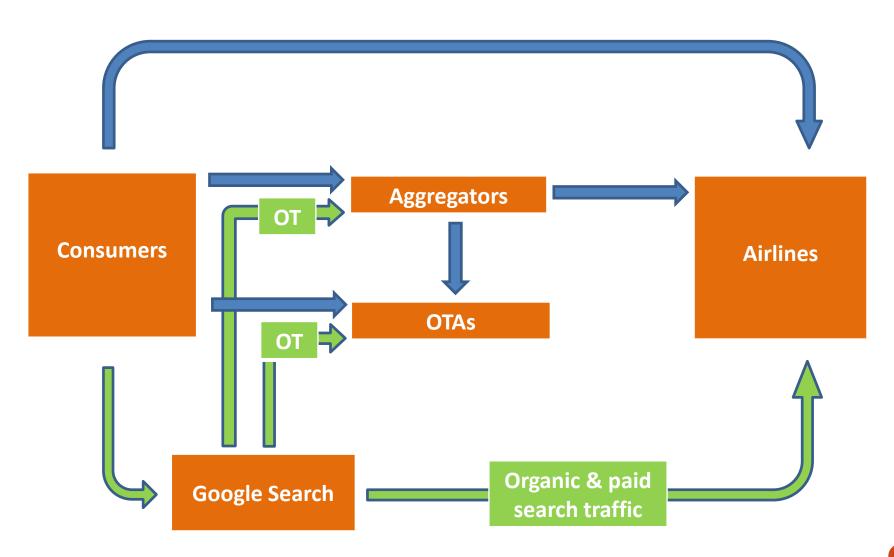
Literature Review

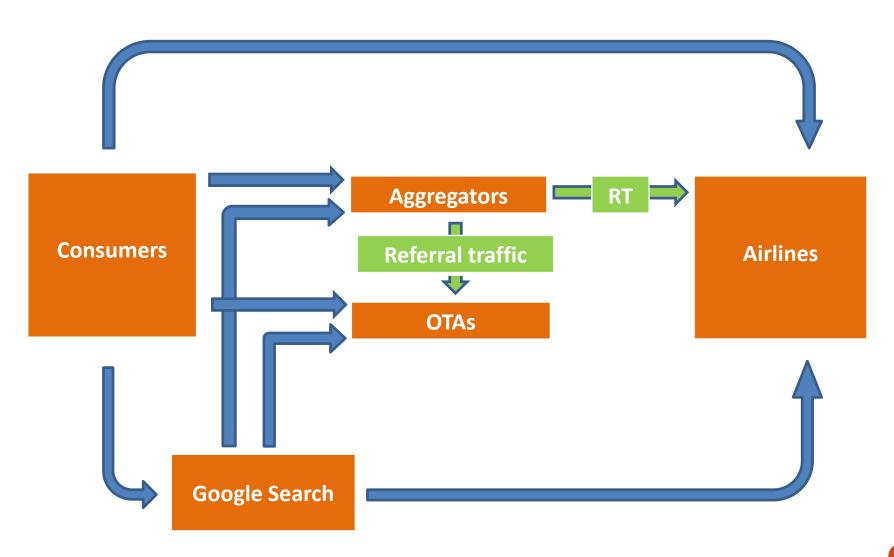
- **SERP Redesign & DMA Compliance**: Pape & Rossi (2025); Püplichhuisen & Sirries (2025): **we contribute to this research line.**
- Algorithmic Bias & Self-preferencing: Chiou (2017); Farronato et al. (2023); Hunold et al. (2022); Waldfogel (2024)
- Search Rankings & Traffic Allocation: Baye et al. (2016); Ursu (2018);
 Calzada et al. (2023)
- **Default Effects & Platform Dominance**: Allcott et al. (2025); Decarolis et al. (2024)
- Air Travel & Online Distribution: Ater & Orlov (2015); Bilotkach et al. (2024)

- Aggregators: compares flight prices and availability from multiple sources (airlines and OTAs). Don't sell tickets directly, but redirects users to airlines or OTAs
 - CPC (Cost per Click): earns money for every redirected user
 - CPA (Cost per Acquisition); commission if the booking is completed
 - Advertising: airlines/OTAs pay to appear at the top
 - Affiliate commissions for hotels, cars, insurance
 - Examples: Skyscanner, Kayak, Momondo, Cheapflights
 - We include Flight Deal Sites in this group: TravelPirates, HolidayPirates.
- Online Travel Agencies (OTAs): users search, book, and pay for flights. Agreements
 with airlines and access to GDS: can issue tickets and provide after-sales services
 - Commission margins on tickets
 - Service fees (changes, cancellations, support)
 - Cross-selling (hotels, cars, insurance)
 - Examples: Booking, Expedia, Expedia, eDreams, eSky

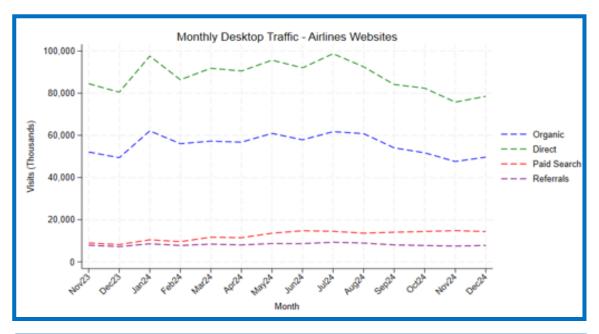








Desktop Traffic to Airline and Comparison Sites



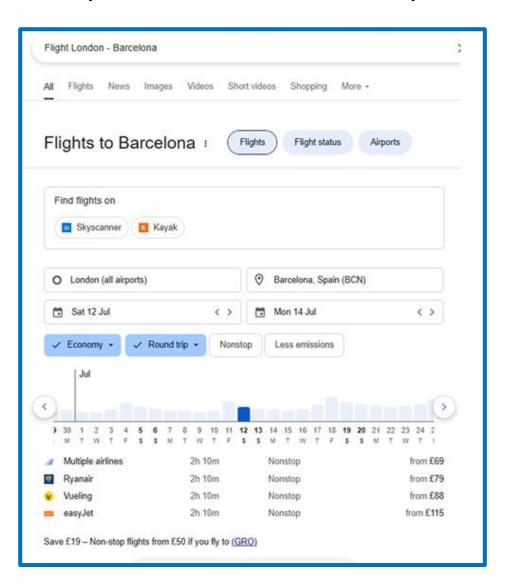
1/3 is organic search traffic

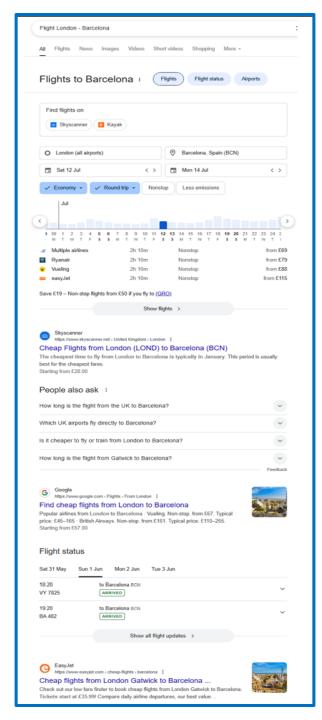


1/4 is organic search traffic

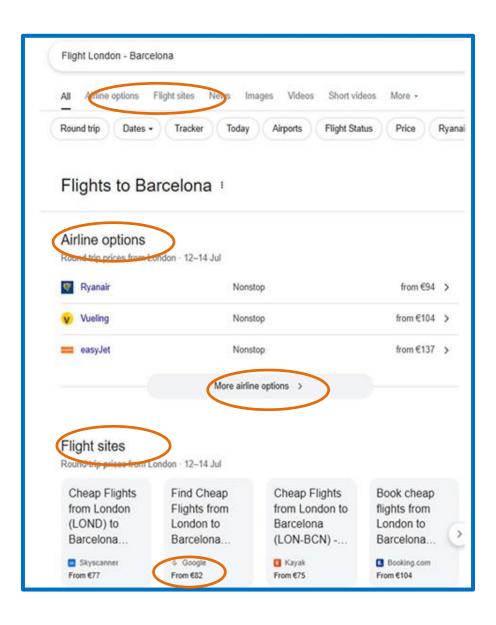
Google's SERP Before March 7th, 2024

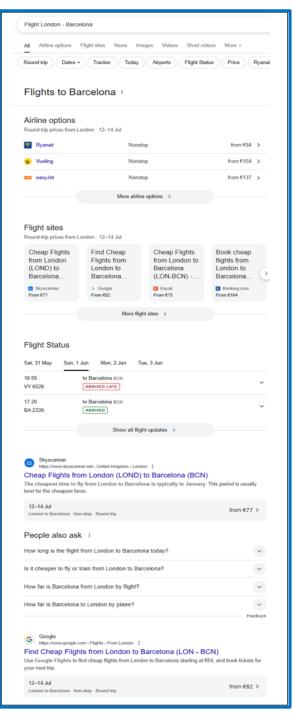
(still in use in the UK and US)





Google's SERP After March 7th, 2024





Data

- Traffic source: Similarweb
- Devices: Desktop (weekly data) and Mobile (monthly data)
- Channels: direct; organic search, paid search and referrals
- Period: November 2023 Dec 2024
- Treated sites: 4 EU countries (France, Germany, Italy and Spain)
- Control sites: United Kingdom and the United States
- Classification for Airlines:
 - Pricing Strategy: Low Cost Carriers (LCC) & Network Carriers (NC)
 - Market Share: Top 5 National Airlines (TNA) & Botton National Airlines (BNA)
 - Visibility: Top Ranking Airlines (TRA) and Botton Ranking Airlines (BRA)
- Classification for Comparison Sites:
 - Top 3, Top 5, and Non-Top
 - Aggregators & OTAs
- Domains with at least daily market share of 0.5% in air travel category of Similarweb in at least one country. Airlines with at least 0.5% of annual seat capacity in ational market (RDC aviation, Apex schedules)

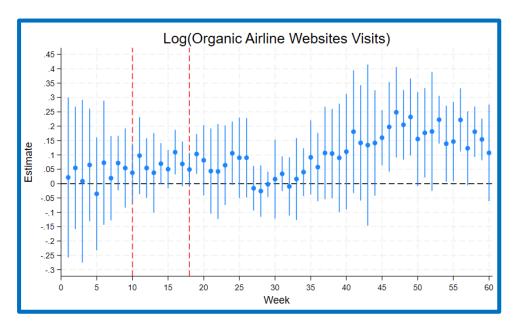
Empirical strategy

Difference-in-Differences (DiD) at the domain-week level

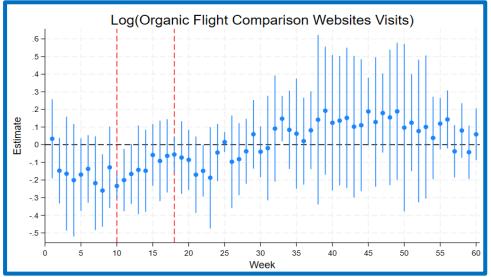
$$\ln(Y_{dct}) = \beta E U_{dc} \times Post_t^{DMA} + \alpha_c + \delta_d + \theta_{dc} + \gamma_t + \varepsilon_{dct}$$
 (1)

- Y_{dct} is the number of visits -including total, **organic search**, direct, paid search and referral visits received by the **desktop and mobile websites** of domain d in country c during week t.
- We include fixed effects per country (α_c), domain (δ_d), domain (θ_{dc}) and week (γ_t).
- Treated group: EU countries (France, Germany, Italy and Spain)
- Control group: United Kingdom and United States
- DMA: March 7, 2024

Pre-Treatment Trends for Desktop Organic Traffic



Parallel pre-trends



Parallel pre-trends

Main Results: desktop

		Air	lines W	ebsites			Flight Comparison Websites				
	Total	Organic	Direct	Paid Search	Referrals		Total	Organic	Direct	Paid Search	Referrals
EU x PostDMA	0,0046 (0,0190)	0.0625** (0,0207)	0,0112 (0,0337)	-0.0714 (0,0436)	0,0379 (0,1146)		0.1380** (0,0353)	0.1863** (0,0509)	0.1083** (0,0376)	0,1067 (0,0843)	0.2385*** (0,0081)
Country FE	✓	✓	✓	✓	✓	•	✓	√	√	✓	✓
Domain FE	✓	√	✓	✓	✓		✓	✓	✓	✓	✓
Country-Domain FE	✓	✓	✓	✓	✓		✓	✓	\checkmark	✓	✓
Week FE	✓	✓	✓	✓	\checkmark		✓	✓	\checkmark	✓	✓
R2 Adjust	0,9680	0,9534	0,9660	0,8669	0,9121		0,9634	0,9431	0,9580	0,9072	0,9395
N	20.252	20.252	20.252	17.859	20.100		9.393	9.393	9.393	6.888	9.198

Heterogenous effects: airlines, desktop & organic

		Low	Cost Ca	rriers	Network Carriers					
	Total	TNA	BNA	TRA	BRA	Total	TNA	BNA	TRA	BRA
EU x PostDMA	0.1325** (0,0411)	0,0741 (0,1042)	0.1490** (0,0564)	0,0667 (0,0659)	0.2444* (0,1284)	0.0393* (0,0155)	0,0551 (0,0602)	0.0345** (0,0164)	0.0641** (0,0236)	0,0004 (0,0277)
Country FE	√	✓	√	√	√	✓	✓	✓	✓	✓
Domain FE	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Country-Domain FE	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Week FE	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
R2 Adjust	0,9623	0,9778	0,9329	0,9807	0,8597	0,9473	0,9932	0,9265	0,9700	0,7879
N	6.344	1.159	5.185	3.294	3.050	13.908	671	13.237	6.893	7.015

- Pricing Strategy: Low Cost Carriers (LCC) and Network Carriers (NC)
- Market Share: Top National Airlines (TNA): 5 domains, 60-85% seats in the country; Bottom National Airlines (BNA)
- Visibility: Top Ranking Airlines (TRA): domains above the median of visits

Heterogenous effects: airlines, desktop & organic

		Low Cost Carriers						Network Carriers				
	Total	TNA	BNA	TRA	BRA	Tota	l TNA	BNA	TRA	BRA		
EU x PostDMA	0.1325** (0,0411)	0,0741 (0,1042)	0.1490** (0,0564)	0,0667 (0,0659)	0.2444* (0,1284)	0.0393 (0,015		0.0345** (0,0164)	0.0641** (0,0236)	0,0004 (0,0277)		
Country FE	✓	✓	✓	✓	✓	√	✓	√	√	✓		
Domain FE	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
Country-Domain FE	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
Week FE	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
R2 Adjust	0,9623	0,9778	0,9329	0,9807	0,8597	0,947	3 0,9932	0,9265	0,9700	0,7879		
N	6.344	1.159	5.185	3.294	3.050	13.90	671	13.237	6.893	7.015		

Heterogenous effects: comp. sites, desktop & organic

	General	Тор 3	Top 5	Non-Top
EU x PostDMA	0.1863** (0,0509)	0,0217 (0,0346)	0,0967 (0,1101)	0.2026*** (0,0450)
Country FE	✓	✓	✓	✓
Domain FE	✓	✓	✓	✓
Country-Domain FE	✓	✓	✓	✓
Week FE	✓	✓	✓	✓
R2 Adjust	0,9431	0,9872	0,9820	0,8679
N	9.393	1.037	1.464	7.929

Heterogenous effects: comp. sites, desktop & organic

	General	OTA	Agregator
EU x PostDMA	0.1863** (0,0509)	0,1335 (0,0797)	0.2479*** (0,0522)
Country FE	✓	✓	✓
Domain FE	✓	✓	✓
Country-Domain FE	✓	✓	✓
Week FE	✓	✓	✓
R2 Adjust	0,9431	0,9387	0,9482
N	9.393	5.062	4.331

Main Results: Mobile

		Airlines Websites						Flight Comparison Websites				
	Total	Organic	Direct	Paid Search	Referrals		Total	Organic	Direct	Paid Search	Referrals	
EU x PostDMA	-0,0007 (0,0288)	0,0390 (0,0375)	-0,0173 (0,0336)	-0.0770* (0,0411)	0,0153 (0,0611)		0.1915*** (0,0365)	0.1798** (0,0600)	0.1954*** (0,0360)	0.1113* (0,0449)	0.2793** (0,0898)	
Country FE	1	√	✓	√	√	l	√	√	√	√	√	
Domain FE		√	√	✓	√		✓	√	√	✓	√	
Country-Domain FE	✓	✓	✓	✓	√		✓	✓	✓	✓	\checkmark	
Month FE	✓	✓	✓	✓	√		✓	✓	✓	✓	\checkmark	
R2 Adjust	0,9648	0,9557	0,9577	0,9869	0,9367		0,9486	0,9224	0,9399	0,9763	0,9415	
N	6.426	6.419	6.426	5.424	6.426		3.948	3.925	3.948	2.989	3.948	

Heterogenous effects: airlines, mobile & organic

		Low	Cost Ca	arriers			Network Carriers				
	Total	TNA	BNA	TRA	BRA	Total	TNA	BNA	TRA	BRA	
EU x PostDMA	0,0768 (0,0541)	0,1063 (0,1370)	0,0792 (0,0660)	-0,0866 (0,1117)	0.2033** (0,0522)	0.0196 (0,0402)	0.1338* (0,0544)	0,0155 (0,0429)	-0.0650** (0,0168)	0,1159 (0,0728)	
Country FE	\checkmark	√	√	√	√	✓	✓	✓	√	√	
Domain FE	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Country-Domain FE	✓	√	√	✓	✓	✓	✓	✓	✓	✓	
Week FE	√	√	√	✓	√	✓	✓	✓	✓	√	
R2 Adjust	0,9612	0,9799	0,9376	0,9834	0,7902	0,9508	0,9921	0,9383	0,9641	0,8523	
N	2.337	280	2.057	994	1.343	4.082	140	3.942	2.250	1.832	

Pricing Strategy: Low Cost Carriers (LCC) and Network Carriers (NC)

Market Share: Top National Airlines (TNA): 5 domains, 60-85% seats in the country; Bottom National Airlines (BNA)

[•] Visibility: Top Ranking Airlines (TRA): domains above the median of visits

Heterogenous effects: comp. sites, mobile & organic

	General	Тор 3	Top 5	Non-Top
EU x PostDMA	0.1798** (0,0600)	0,0402 (0,0632)	0,0551 (0,0407)	0.1921** (0,0649)
Country FE	✓	✓	✓	√
Domain FE	✓	\checkmark	✓	\checkmark
Country-Domain FE	✓	✓	✓	√
Week FE	✓	✓	✓	✓
R2 Adjust	0,9224	0,9779	0,9837	0,8565
N	3.925	238	350	3.575

Heterogenous effects: comp. sites, mobile & organic

	General	OTA	Agregator
EU x PostDMA	0.1798** (0,0600)	0.1864* (0,0840)	0.1686** (0,0598)
Country FE	✓	√	√
Domain FE	✓	✓	✓
Country-Domain FE	✓	✓	✓
Week FE	✓	✓	✓
R2 Adjust	0,9224	0,9140	0,9346
N	3.925	2.161	1.764

Summary of results

- Airlines: Redistribution towards LLCs and low visible players
 - LCCs: +13% desktop, +8% mobile (significant for less visible carriers)
 - NCs: +4% desktop, +2% mobile (significant for larger carriers)
 - Small national airlines (BNA, BRA): significant increases
- Comparison sites: Promotion smaller platforms via visibility boost
 - Non-Top platforms: +18-20% (more clear effects for aggregators)
 - Top 3 & Top 5: no significant effect
 - Important increase in referral traffic
- Country Heterogeneity: main results consistent across countries

Which are the results for prices?

- Data on fares and supply from RDC Aviation
- Data at the route-airline level
- Routes that link airports in the UK with the EU countries
- Monthly data: March 2023 March 2025
- Posted prices:
 - bookings one month and one week before the flight departure
 - also weighted fares, considering number of bookings in different periods
 - focus on one-way flights
 - focus on routes with HHI<1
 - include all government and airport taxes
- Controls at route level: flight frequency; flights in origin and destination airports;
 flights operate by the airline in the route, HHI index
- Airlines characteristics: LLC (according to the ICAO); participation in global alliances (oneworld, Star Alliance, SkyTeam), top or bottom national airlines.
 - 94% of observations refer to low-cost airlines
 - 78% of observations involve top national airlines
 - 86% of observations for Spain, 11% for Italy, and 4% for France and Germany.

Empirical strategy

We estimate the following model at the route-airline level *i* month *m* and in year *t*:

$$\ln(fares_{imt}) = \alpha + \beta DMA_{imt} + \lambda X_{imt} + \gamma_i + \eta_m + \nu_t + \varepsilon_{imt}$$
 (2)

- $fares_{imt}$ is the mean posted fares (one month, one week, weighted fares)
- Treated route-airline pairs: origin airport in the UE and destination in the UK.
- Control route-airline pairs: origin airport in the UK and destination in the EU.
- DMA=1 when origin airport in the EU and time after March 2024
- Treated group: EU countries (France, Germany, Italy and Spain)
- X_{imt} : control variables at the route level

Effects on fares

	(1)	(2)	(3)
VARIABLES	lweightedaverage	lonemonthfare	loneweekfare
	•	•	
DMA	0.0161	0.0153	-0.0375**
	(0.0138)	(0.0162)	(0.0195)
ln(flights_origin_airport)	0.206***	0.110**	-0.00864
	(0.0551)	(0.0519)	(0.0533)
ln(flights destination airport)	0.0821*	0.0629	-0.0810*
	(0.0442)	(0.0443)	(0.0472)
ln(flights airline)	-0.243***	-0.248***	-0.268***
, , , ,	(0.0393)	(0.0422)	(0.0464)
Constant	4.234***	5.246***	7.508***
	(0.784)	(0.789)	(0.841)
Observations	10,134	10,134	10,134
R-squared	0.477	0.424	0.370
Number of routeairline	692	692	692
Year FE	YES	YES	YES
Route-airline FE	YES	YES	YES
Month FE	YES	YES	YES
Unit	Route-airline	Route-airline	Route-airline
Sample	UK-big EU	UK-big EU	UK-big EU
Airline	All	All	All
HHI	< 0.5	< 0.5	< 0.5
Period	20233 to 20253	20233 to 20253	20233 to 20253
Clusters	Route	Route	Route

Effects on fares

VARIABLES	(1) loneweekfare	(2) loneweekfare	(3) loneweekfare	(4) loneweekfare	(5) loneweekfare	(6) loneweekfare	(7) loneweekfare
DMA	-0.0233** (0.0112)	-0.0336** (0.0145)	-0.0460** (0.0196)	0.0604 (0.0680)	-0.0434** (0.0187)	-0.0591** (0.0236)	-0.0497 (0.0432)
Observations	32,953	18,337	10,134	627	9,507	7,906	2,228
R-squared	0.276	0.295	0.526	0.346	0.389	0.389	0.366
Number of	1,902	1,388		57	635	527	165
routeairline							
Year FE	YES	YES	YES	YES	YES	YES	YES
Route-airline	YES	YES	NO	YES	YES	YES	YES
FE							
Month FE	YES	YES	YES	YES	YES	YES	YES
Origin FE	NO	NO	YES	NO	NO	NO	NO
Destination FE	NO	NO	YES	NO	NO	NO	NO
Airline FE	NO	NO	YES	NO	NO	NO	NO
Unit	Route-airline	Route-airline	Route-airline	Route-airline	Route-airline	Route-airline	Route-airline
Sample	UK-big EU	UK-all EU	UK-big EU	UK-big EU	UK-big EU	UK-big EU	UK-big EU
Airline	All	All	All	Network	LCC	Top national	Bot national
HHI	Áli	<0.5	< 0.5	< 0.5	< 0.5	<0.5	< 0.5
Clusters	Route	Route	Route	Route	Route	Route	Route

Conclusions

Google Flights was not neutral for the market

SERP design matters and can affect competition

Thanks!