



Computer & Communications Industry Association (CCIA)
Supplemental Comments to the CMA on
FACEBOOK, INC / GIPHY, INC REMITTAL
5 August 2022

The Computer & Communications Industry Association (CCIA) welcomes the opportunity to provide supplemental comments on the Competition and Markets Authority Notice of provisional findings on remittal in Facebook, Inc (now Meta Platforms, Inc) / GIPHY, Inc.¹

In the CMA's Final Report,² GIPHY's Paid Alignment model is described in detail. In particular, advertisers paid GIPHY in exchange for GIF-based advertising. The CMA's finding of a Horizontal SLC is based in large part on the competitive constraint that these branded GIFs represent in the display advertising market.

CCIA notes that TikTok also supplies and monetises branded GIFs that appear as GIF Stickers atop user generated content.³ TikTok's supply of this form of advertising, which has been ongoing since 2021, can serve as a continued competitive constraint and a driver of dynamic competition in the display advertising market. The Final Report does not appear to discuss this form of advertising as a possible substitute for advertisers. CCIA submits that before the Final Report is re-adopted, TikTok's competing "Branded Effect" service should be thoroughly investigated and analysed.

Sincerely,
Kayvan Hazemi-Jebelli
Competition & Regulatory Counsel to CCIA

¹ CMA "FACEBOOK, INC / GIPHY, INC REMITTAL Conduct of the remittal (18 July 2022), available [here](#).

² CMA "Completed acquisition by Facebook, Inc (now Meta Platforms, Inc) of Giphy, Inc. Final report" (30 November 2021), available [here](#).

³ TikTok "Branded Effect: Place your brand center stage" (13 July 2021), available [here](#).