



From:

Nicolas Rieul – President of Alliance Digitale

Philippe Carli – President of APIG

Bertrand Gié – President of Geste

Corinne Mrejen – President of SRI

Magali Florens – CEO of UDECAM

Jean-Luc Chetrit – CEO of Union des marques

To: Tim Cook
CEO, Apple Inc.
One Apple Park Way
Cupertino, CA 95014

Paris, May 29th, 2024,

Request: French Marketing and Media professionals express great concerns regarding Apple's "Web Eraser" Feature announced as part of iOS 18 update

Dear Mr. Cook,

We have recently become aware of the impending release of the next Safari update integrated into iOS 18, set to be unveiled at the next Apple's Worldwide Developers Conference (WWDC) on June 10th. Among the anticipated features, one in particular has captured our attention: the so-called AI-based "web eraser", designed to remove on websites content deemed "undesirable" or "unwanted" and remember such changes for subsequent visits.

This revelation has catalyzed the concerns of the 800 companies we represent collectively across the Advertisers, Media Agencies, Publishers, Media, AdTech, and Mobile Marketing sectors. It is obvious that this feature effectively equates to integrating by default an "ad blocker" into the Safari browser to lock out all advertising for an indefinite period.

Online advertising serves as the lifeblood of the Internet as we know it. Advertising also constitutes one of the primary economic models for the press and media, accounting for 81% of the digital revenues of European newspapers and magazines¹. It is therefore an indispensable revenue stream for most of European publishers and content providers, as emphasized recently in a letter sent to Apple by the News Media Association in the United Kingdom².

¹ The Economic Contribution of Digital Advertising in Europe, IHS Markit, 2017. See here: https://datadrivenadvertising.eu/wp-content/uploads/2017/09/DigitalAdvertisingEconomicContribution_FINAL-1.pdf

² See here: <https://www.ft.com/content/c6dcbe7b-eaf0-41d1-adb4-f9a68542e2cb>

Implementing such a feature on a browser like Safari that holds almost 26% of all mobile browser market share in France³ (and almost 90% on Apple mobile devices) and that is an essential route for both citizens to access journalism and companies to monetize their content online would have profound implications:

- It would adversely affect the digital advertising revenues of media outlets, thereby further jeopardizing their business model in an already troubled period;
- It would restrict citizens' access to free, diverse, and quality information, with significant consequences for pluralism, content accessibility, and democratic vitality;
- It would undermine an entire ecosystem of 9000 companies and 100,000 jobs⁴ reliant on online advertising and digital marketing.

We contest that a browser with great market power like Safari, designated as Core Platform Service (CPS) under the Digital Markets Act (DMA) can arbitrarily and unilaterally impose such changes without a comprehensive assessment of the impacts on other companies as well as the potential benefits for Apple's own services, specifically advertising.

On another level, this echoes the brutal rollout of ATT in April 2021, which significantly and unfairly disrupted the ad and media ecosystem resulting in estimated losses of 16 billion only for the year 2022⁵, and which is currently the subject of several anti-competitive complaints in Europe, including France.

Furthermore, we harbor apprehensions regarding the feature's anticipated capability to indiscriminately and without supervision remove or change the content of media outlets online. Besides the extremely short notice period and the lack of detailed and verified information on this new feature, it raises numerous questions, particularly concerning legal and editorial responsibilities that Apple has still not responded to.

We urge you to reconsider the implementation of this feature and to engage in constructive dialogue with stakeholders. We stand ready to discuss these matters further and would appreciate the opportunity to meet with you or your teams to address these issues comprehensively.

Press contact

Pierre Devoize

Deputy MD Alliance Digitale

pierre@alliancedigitale.org

³ See here: Statcounter 26,24% in May 2024 <https://gs.statcounter.com/browser-market-share/mobile/france>

⁴ Study 'Marketing Digital une filière cœur de l'économie française', EY Fabernovel, Alliance Digitale, 2023 See here:

<https://www.alliancedigitale.org/alliance-digitale-revele-en-exclusivite-letude-sur-le-marketing-digital-lors-de-son-forum/>

⁵ "IDFA and Big Tech Impact – One Year Later", April 2022, Cabinet Lotame. See here: <https://www.lotame.com/idfa-and-big-%20tech-impact-one-year-later/>

About Alliance Digitale

Alliance Digitale is the leading professional association for digital marketing players in France. It was formed in 2022 from the merger of IAB France and the Mobile Marketing Association France.

Alliance Digitale's main mission is to structure the development of the digital marketing industry and promote innovative, responsible, and interoperable solutions by defining industry standards and best practices.

The association is also a privileged interlocutor for public authorities, the media, and other professional organizations in matters of digital regulation and the promotion of an open Internet. The association brings together the vast majority of digital marketing players in France, representing more than 250 companies (Brands, Media, Agencies, Tech).

About Alliance de la Presse d'Information Générale

The Alliance is the main French publishers organization, bringing together 285 publications, which employ around 42% of French journalists and weigh 63% of print and 79% of digital circulations. The Alliance is defending publishers' interests and promoting a fair ecosystem for press and journalism.

About Geste

GESTE is a French organization that brings together the main publishers of online content and services, comprising more than 100 members, including most French media groups. Since its establishment in 1987, GESTE has been analyzing changes in publishers' economic models, providing a better understanding of the challenges of digital transformation, and contributing to the development of favorable economic, legislative, and competitive conditions.

About SRI

The SRI (Syndicat des Régies Internet) is a French trade association regrouping 29 members, digital sales houses and sell-side adtech partners. The SRI and its members share their expertise and promote best practices for a responsible and sustainable digital advertising landscape. It also provides key information to understand the complexity of the digital advertising ecosystem, in particular through its report "l'Observatoire de l'e-pub".

About Udecam

UDECAM (Union of Media Buying and Planning agencies) is the Media Agencies Trade Body in France. L'Udecam gathers 95% of French media agencies and brings together: Anacrouse, CoSpirit Media, Dentsu (Carat, iProspect, DentsuX), Media units of Havas Group (Havas Media, Arena Media, Agence79), GroupM (EssenceMediacom, Wavemaker, Mindshare), IPG Mediabrands (Initiative, UM), Mediaplus, Oconnection, OmnicomMediaGroup (OMD, Remind-PhD, Fuse), Publicis Media (Zenith, Starcom, Spark, Blue 449, Performics & Publicis Connect), Repeat, Values.

Since 1996, this association has been a forum for dialogue and consultation with the various media and communication partners, but also amongst the Agencies 'members. It promotes media and non-media expertise, defends the collective interests of its members, and acts of the media agencies' representation to deal with all market players: public authorities, professional and inter-professional bodies, media owners, advertisers, and opinion leaders.

About Union des marques

Union des marques, founded in 1916, is the French advertiser association and represents more than 250 companies and 1600 brands, from all economic sectors, all together with one ambition: Build sustainable brands.

In copy:

- Apple France
- French Competition Authority, *Autorité de la concurrence*
- French Minister of Culture, Mrs. Rachida Dati
- French Minister of Economy, Mr. Bruno Le Maire
- Commissioner for Internal Market – Thierry Breton