



# **A SURVEY-BASED ASSESSMENT OF THE IMPACT OF THE DRAFT DIGITAL COMPETITION BILL, 2024 ON MSMEs IN INDIA**

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# A Survey-Based Assessment of the Impact of the Draft Digital Competition Bill, 2024 on MSMEs in India

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## TABLE OF ACRONYMS

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<b>CDCL</b>	Committee on Digital Competition Law
<b>DCL</b>	Digital Competition Law
<b>DDCB</b>	Draft Digital Competition Bill, 2024
<b>DMA</b>	Digital Markets Act
<b>EU</b>	European Union
<b>MSME</b>	Micro, Small, and Medium Enterprises

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# 1 Introduction and Summary of Findings

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This paper seeks to understand the extent to which micro, small and medium-sized enterprises (MSMEs)<sup>1</sup> rely on large digital platforms to advertise to and attract customers, and the impact on MSMEs when regulation or legislation restricts them from doing so. The triggers for this research paper are developments in some countries to enact ex ante antitrust regulations that seek to limit the ability of digital platforms to provide effective advertising and other services. These rules ignore the well-recognised benefits that MSMEs derive from accessing them. (Cennamo [2023](#)). One example is the European Union’s Digital Markets Act<sup>2</sup> (DMA) which requires large digital platforms it deems “gatekeepers” to allow users to proactively opt-in<sup>3</sup> to data processing and sign-up procedures, by offering a less personalised but equivalent product alternative (Cennamo [2023](#)).

India is considering similar provisions for its own version of the DMA. On March 12, 2024, the Ministry of Corporate Affairs released a Draft Digital Competition Bill, 2024 (DDCB) along with a report justifying the need for it. The DDCB establishes a framework to identify Systemically Significant Digital Enterprises (SSDEs) – entities with at least one crore end-users or 10,000 business users that provide “core digital services”. These include online search engines, online social networking services, video-sharing platform services, interpersonal communications services, operating systems, web browsers, cloud services, advertising services, and online intermediation services. The DDCB introduces a set of horizontal obligations for SSDEs.

This paper argues that the DDCB must consider both the macro and micro contours of MSMEs, given their importance to the Indian economy. Between 2021-23, on average MSMEs accounted for nearly 29 percent of GDP, 36 percent of manufacturing output and 43 percent of exports (PIB [2023](#)). The MSME Annual Report (Ministry of Micro, Small and Medium Enterprises [2022-23](#)) provides a breakdown of segments within the industry. Micro enterprises account for 99.47 percent of enterprises, while small and medium enterprises account for 0.52 and 0.01 percent respectively.

A majority of MSMEs are owned by proprietors (95.98 percent), most of whom belong to socially backward classes, scheduled castes, scheduled tribes and other backward classes (66.27 percent). This bottom-of-the-pyramid ownership structure means that MSMEs in the country face several challenges and constraints, as listed in the MSME Annual Report (Ministry of Micro, Small and Medium Enterprises [2022-23](#)). These include:

- Low budgets and limited access to credit that can aid in technological capability enhancements. Consequently, MSMEs are unable to grow and realise their full potential;
- Limited market access, technological upgradation, ease of doing business;
- Limited advertising and marketing support/ awareness / prowess.

An important development that enables MSMEs to overcome these constraints over the past decade is the increased use of large digital platforms such as e-marketplaces and social media networks (Chadha et al. 2023). For example, Goldfarb (2014), Clough et al. (2019) and Chouaki et al. (2022), among others, show that these platforms help small businesses optimise their resources by reducing the cost of targeting ads to relevant recipients – an opportunity that was inaccessible to them previously. Through such kinds of optimisation, access to large digital platforms enables MSMEs to enter and expand into new markets, enabling them to compete with the vast fulfilment infrastructure and deep pockets of larger incumbents.

Another important facility made available to MSMEs by large online platforms are identification management services known as single-sign on. This is when a third-party website uses a digital platform's sign-on service to onboard customers. For example, an online retail website that allows customers to sign in using a Google, Facebook or Amazon account without necessarily having to create an account to complete the purchase (and potentially gain some benefits as a result). Research suggests that the single-sign on system is extremely convenient for users as it spares them from managing multiple passwords and accounts (Bauer et al. 2013). Research also suggests that this service is useful for MSMEs because it gives them a means to leverage the large user bases of digital platforms as potential customers (Trinh 2013).

This paper contributes to existing literature by providing empirical evidence of the mutually beneficial relationship between MSMEs and large digital platforms. It does so via a primary survey of 300 business proprietors across India. In the context of potential benefits that targeted advertising and single sign-on might bestow on MSMEs, we decided to evaluate how these services impacted the businesses of Indian MSMEs. Our findings were as follows:

- **There is overwhelming support for a positive impact of targeted digital advertising on large digital platforms on five facets of commercial efficiency for MSMEs: revenue generation, cost saving, time saving and attracting Indian and foreign customers. Please see Figure 2 for more details.**
- **A majority of the surveyed MSMEs (75 percent) found ad services on large digital platforms better as compared to traditional ads, in terms of ease of use and accessibility. Please see Figure 3 for more details.**
- **Almost 8 out of 10 surveyed MSMEs rely on the identification services (single-sign on) of large digital platforms. Customer onboarding is the main reason (cited by 51 percent respondents) for MSMEs to use these services. Please see Figure 4 for more detail.**
- **These results make it abundantly clear that MSMEs are utilising the identification services like single-sign on that are offered by large digital platforms to grow, rather than to eliminate an existing limitation.**

Due to the dependence of MSMEs on targeted advertising and single-sign on to drive businesses, we decided to evaluate their perceived impact around regulations that negatively affected these key services. For this reason, our survey focusses on two provisions in the prospective DDCB. One is a restriction on SSDEs from cross-using or combining personal data of



end-users and business users, or sharing it with a third party, without their consent. This provision closely mirrors the DMA's opt-in requirement for data processing under Article 5(2). On this provision, Recital 37 of the DMA explicitly accepts any degradation in the quality of product experience, provided it is a direct outcome of the gatekeeper's inability to process user data. While the CDCL does not expressly outline such an expectation in its report, it is reasonable to predict that it anticipates a similar result for the data usage restrictions it recommends. To specify, it is likely that the restriction on data usage in the DDCB will negatively impact the ability of platforms to target ads effectively. In that context, our survey finds that **61 percent of surveyed MSMEs indicate that limitations placed on targeted advertising of large digital platforms under the DDCB will have a negative impact on them.**

We also investigate a ban on tying and bundling that restricts SSDEs from requiring or encouraging end-consumers (and business users of core digital services) to use one or more of the other products offered by the SSDE. There is a strong likelihood that this provision will negatively impact the ability of MSMEs to access services like single-sign on, as these are often provided as part of a larger product bundles. Unbundling such services may result in an increase in their prices, and reducing their availability to MSMEs that typically operate on tight budgets. Our survey shows that **6 out of 10 MSMEs would be negatively affected by restrictions on sign-in services of digital platforms. This ratio is twice as high as that of those in favour of such restrictions. Please see Figure 6 for more details.**

We also focus on MSMEs' awareness of regulatory developments in this context. This is particularly important because the Committee on Digital Competition Law (CDCL) conducted a closed consultation on this topic, where only specific stakeholders could have their say. While the DDCB is out for public consultation, the opacity of initial deliberations sparked significant debate. Stakeholders including civil society groups, tech experts and academics called for an open consultation on the Digital Competition Bill as it was likely to impact digital inclusion, user experience, privacy and security, foreign investment, cost of doing digital business, etc (Lele 2023). In this context, our survey found that:

- **74 percent of MSMEs surveyed did not participate in the DCL consultations that the Committee on Digital Competition Law (CDCL) conducted, including 22 percent who were not even aware of the existence of the CDCL.**
- **Importantly, this does not suggest that the 26 percent that indicated they participated in the consultations actually showed up for them. A perusal of the list of stakeholders indicates that there was no MSME that participated individually, and only two of the participating associations were likely to have MSME members. Therefore, it is likely that the small percentage surveyed MSMEs who reported participating in the consultation were members of these associations.**

**The limited participation of MSMEs in the initial discussions of the CDCLs explains why the report, along with the larger discourse around the DDCB in India, seems to downplay the complementarity between MSMEs and large digital platforms.** Rather, the focus is almost exclusively on competition between these two pillars of economic growth. For example, these laws are intended to offer smaller businesses (and consumers) an opportunity to compete with

large digital platforms or gatekeepers, without giving due importance to the symbiotic flow of value between the two. Previous research suggests that such collaboration between businesses and large platforms has significant value in both monetary and strategic terms (Magnusson and Nilsson 2005, Bjerke and Johansson 2015, Chiambaretto et al. 2020, Giglio et al. 2023).

Our results suggest that because the DDCB does not factor in the symbiotic relationship between digital platforms and MSMEs, it could possibly jeopardise efficiency gains in the sector. The proposed law would also lead to significant deadweight losses, as these enterprises would have to recalibrate their online commerce and advertising by diverting resources that could otherwise have been used for value creation. The only beneficiaries of the DDCB would be entities that directly compete with SSDEs. Moreover, several aspects of the synergistic relationship between MSMEs and digital platforms, such as targeted advertising and single-sign on services, have a large positive impact on customer acquisition and revenue generation for MSMEs. Limiting them can therefore become a make-or-break factor for many MSMEs, as they are predominantly young micro-enterprises. **In light of these considerations, we recommend the withdrawal the provisions pertaining to restrictions on data usage under Section 12(2) and tying and bundling under Section 15 of the DDCB. We also implore the Ministry to adopt a wait-and-watch approach and learn from the experience of the European Union and its experiment with the DMA, to further understand the ramifications of introducing ex-ante competition laws that do not consider the nature of stakeholder interactions in a digital ecosystem holistically.**

## 2 Survey Design and Profile of Enterprises

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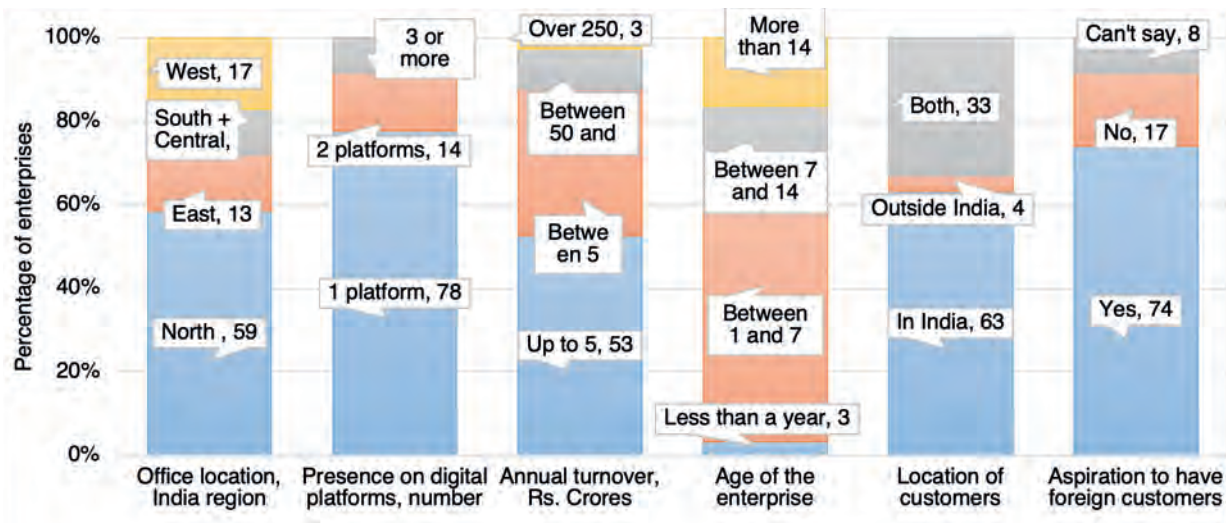
To understand the extent to which MSMEs rely on digital platforms to advertise and attract customers, we surveyed 300 business proprietors from across India. The survey focused on four aspects of the impact of targeted advertising on enterprises: (a) current operational profile and indicators, (b) efficiency gains in revenue generation, cost reduction and time savings, (c) market access, demand growth and ease of operations, and (d) awareness of regulatory developments related to the DDCB. In terms of single-sign on services, the survey consisted of close-ended questions that could be answered either on a Likert scale or by multiple choice. In the case of multiple-choice questions, respondents had the opportunity to supplement their answers if the suggested answers were insufficient.

While the survey was conducted in January-February 2024 and the provisions of the Draft Bill came out on March 12, 2024, its findings remain relevant. This is because the questions were framed to accommodate the impact of broader ex-ante principles that we inferred the CDCL would use, and indeed did. These inferences were drawn from the fact that the CDCL relied on the recommendations of the Parliamentary Standing Committee on Finance regarding anticompetitive practices of large tech companies,<sup>4</sup> as its basis. Illustratively, the provisions of the Draft Digital Competition Bill, correspond to the anti-competitive practices identified in the Parliamentary Standing Committee's report.<sup>5</sup>

Figure 1 shows the profile of the enterprises surveyed. All four geographic regions of the country were represented in the sample, with a higher proportion of enterprises in North India, especially in the National Capital Region (NCR). 98 percent of the enterprises were from the MSME sector (in terms of annual turnover), with micro, small and medium enterprises accounting for 53, 35 and 10 percent respectively. Interestingly, almost 6 out of 10 of the surveyed enterprises are only up to 7 years old. This means that the current survey shows a high proportion of new entrants / start-ups – an economic segment widely recognised as a growth driver.

The figure also shows that 80 percent of MSMEs rely on a single digital platform for advertising and commerce. This could be partly due to fact that most MSMEs in the sample are micro enterprises. However, this could also mean that there is a close symbiotic relationship between MSMEs and select digital platforms – where the latter effectively fulfil the online promotion, advertising and trading needs of MSMEs. And even if businesses diversify from one platform to others – which 2 out of 10 in the current sample do – this symbiotic relationship is likely to continue, as more than 70 percent are looking to diversify their operations into foreign markets.

**Figure 1: Profile of Businesses**



Notes: The data comes from a primary survey of 300 MSMEs conducted in January-February 2024.

**Overall, the sample consists of a heterogeneous mix of MSMEs, with the median being 1-7 year old micro-enterprises from North India that serve domestic customers. The median respondent also utilises only one digital platform for its online advertising and commerce needs and aspires to serve foreign customers.**

### 3 Impact of Targeted Digital Advertising on Efficiency Gains for MSMEs

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There are three kinds of personalised advertising on digital platforms *a la* Evans (2009) and Goldfarb (2014): contextual targeting, demographic targeting and behavioural targeting. The first views the user's search for a product or service as a statement of intent to pull information about that product or service as well as their related counterparts. In this case, advertisers present their relevant offer at the exact moment they are searching for it. Demographic targeting uses commonalities between different demographic groups (e.g. a 20-year-old living in a suburb and looking for a job after university) to present banner, video, and media rich ads and other formats seen on Facebook, Twitter or Instagram. Such targeting is becoming more sophisticated as users provide platforms with more information about themselves and their network. Finally, behavioural targeting involves displaying ads that are determined by a user's previous clickstream data (i.e. the information collected as the user navigates a website).

In the literature, all three types of ad targeting are considered to help businesses achieve efficiency gains by rationalising costs, maximising opportunities to increase sales, saving time and increasing reach. The following considerations are worth mentioning in this context. First, there are a variety of payment models that businesses as advertisers can choose through digital platforms. These include cost-per-click and cost-per-thousand impressions, among others. Such a menu of options helps many businesses, especially micro and small enterprises that don't have deep pockets, to convert some of the initial fixed costs of advertising and promotion into variable expenses (Chadha et al. 2023). These costs represent a barrier to entry, whereas their variable counterparts do not because of their inherent flexibility.

Second, when advertising via traditional media, there is a limited possibility to determine whether a particular person is listening to the advert or ignoring it. On the other hand, businesses that advertise online can accurately ascertain when a person visited their website at a particular time. The advertising industry's core purpose is to efficiently match advertisers with their target consumers. Historically, agencies facilitated this by coordinating between businesses seeking to advertise and print media outlets. The more dynamic means of matching offered by online advertising enhances the precision of matching advertisers with customers. For instance, contextual advertising can be used to connect sellers of saltwater fishing rods with enthusiasts of fly fishing through a search engine index (Evans 2009). Thus, relocating advertising resources to online platforms can generate significant economic efficiencies for businesses. It also gives businesses the space to limit spending advertising money on those people who are unlikely to become buyers and thus avoid a certain deadweight loss (Zhang and He 2018).

Third, advertising on digital platforms helps small companies stand out in a crowd and, as a consequence, engage with their customers more efficiently. Furthermore, small businesses can use these intermediaries to alert customers about latest offers on products and services, in order to maintain an ongoing relationship with them (Deb 2014, Jones et al. 2014, Ruggieri et al. 2018).

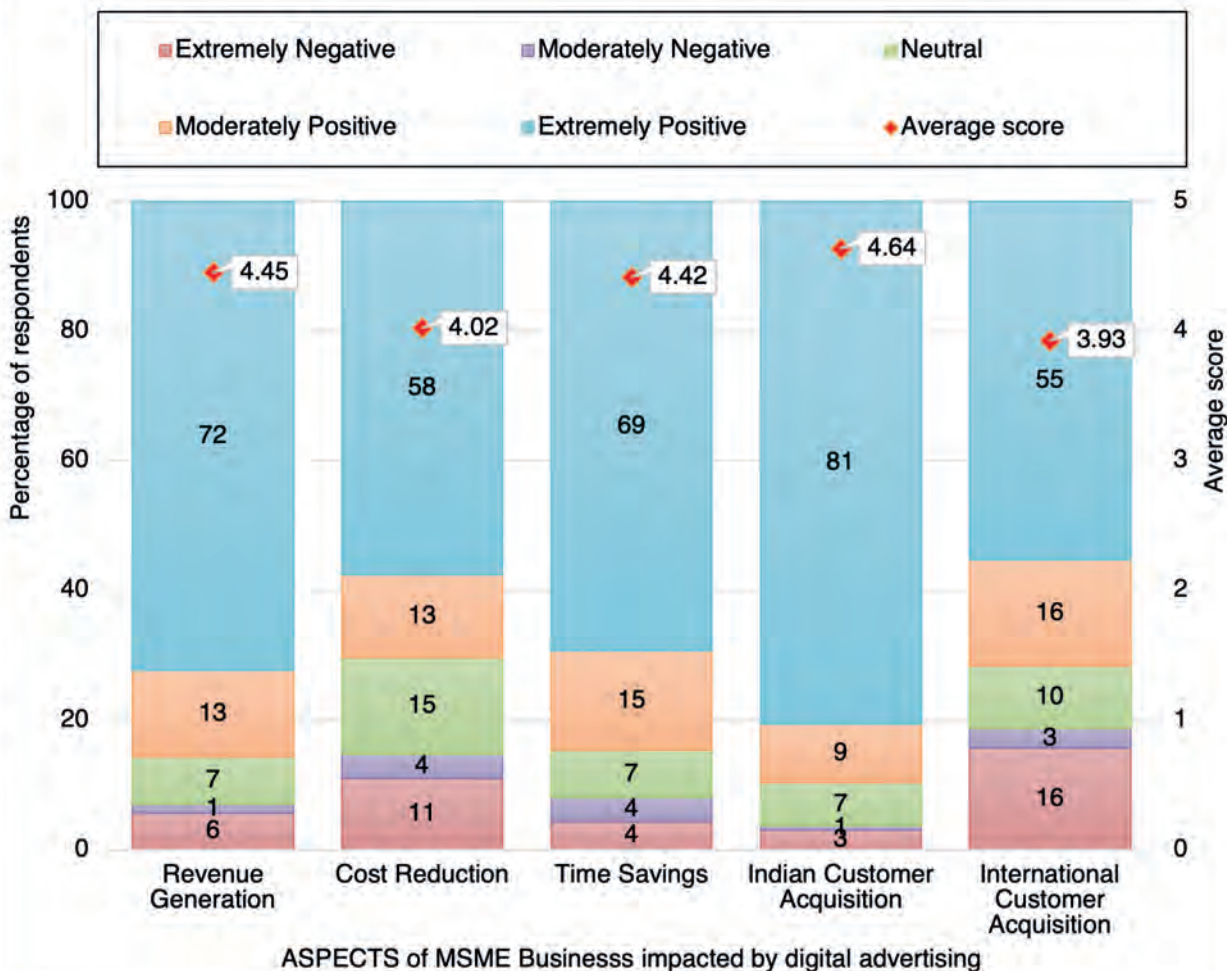
Jones et al. (2014) find that such marketing campaigns had a positive impact on small businesses in the US state of Maine by increasing traffic, awareness and sales. Chepkemoi et al. (2018) found a similar positive impact on the sales performance of small businesses in the Nakuru Central Business District in Kenya.

The personalisation offered by advertising on large digital platforms also plays a key role in maintaining enduring buyer-seller relationships. For instance, Deb (2014) uses a consumer survey in India to highlight the importance of retailers understanding customers better to maintain “long-term relationships” with them.

Finally, many businesses have utilised digital platforms because a growing number of peers at home and abroad are using them (Watson IV et al. 2018, Qi et al. 2020, Samiee 2020). Customers and suppliers also favour the use of digital platforms to avail diverse options and asynchronous communication (Ghosh 1998, Kauffman and Pointer 2022). These characteristics put businesses under pressure to use digital platforms for commerce and advertising. There is also evidence that their use reduces the risk of businesses exiting domestic and foreign markets (Deng et al. 2022).

In the current survey, we test these findings by asking respondents about the impact of targeted digital advertising on five commercially relevant factors: revenue generation, cost savings, time savings and attracting Indian and foreign customers (Figure 2). There is overwhelming support for a positive impact of digital advertising on all five attributes. Overall, the impact of digital advertising on customer acquisition in India tops the rankings, followed by revenue generation and time savings. When it comes to cost reduction and attracting foreign customers, the overall impact is moderately positive. This is understandable as the majority of enterprises in the current sample are micro and small businesses that already place significant emphasis on cost savings and only 37 percent of them serve international markets (see Figure 1). However, as the proportion of MSMEs serving international markets grows, the impact of digital advertising on cost reduction and attracting foreign customers will only increase.

**Figure 2: Efficiency Gains through Targeted Digital Advertising**



Notes: The average score is calculated as the mean value of the ratings (i.e. in ascending order, extremely negative = 1 and extremely positive = 5), weighted with the respective frequency. The data comes from a primary survey of 300 MSMEs conducted in January-February 2024.

While these survey findings are in line with existing ones, they are also important from a policy perspective. Specifically, **a digital competition law that does not factor this synergic relationship between digital platforms and MSMEs would jeopardise efficiency gains in the economy. It would also lead to significant deadweight losses** because these entities would have to recalibrate their online commerce and advertising.

## A. Case Study: Comparison of Experience with Digital Ads and Traditional Advertising

It is important to compare businesses' experiences with digital ads versus traditional ones to understand the roles these two channels play in economic value creation. This comparison can be summarised in two composite parameters: Ease of use/accessibility and price of ads. Table 1 breaks down these two parameters into different attributes. Clearly, digital ads scores over traditional ones in terms of ease of use/accessibility.

**Table 1** Digital ads versus traditional ads, attributes

Attributes	Traditional ads	Digital ads
Nature	Static	Dynamic
Conversion	Slow	Faster
Engagement	Low	Higher
Return on Investment	Difficult to measure	Easy to measure
Tracking	Difficult	Easy
Targeting	Standardized	Customized
Tweaking	Not possible after ad placement	Possible even after ad placement
Reach	Local	Global
Frequency of results	Delayed	Real-time
Communication	One-way Communication	Two-way Communication
Pricing	Administrative	Auction or Administrative

Source: Wharton Online ([n.d.](#)), Economic Times ([2023](#)).

While the pricing of traditional advertising often follows an administrative mechanism (i.e. pre-decided by editor, media house, publisher, etc.), its digital counterpart follows a programmatic buying model. Here, every available advertising space is auctioned and advertisers decide whether and how much to bid based on the information they have about the current user. Despite these added capabilities, 41 percent of the respondent MSMEs indicated that ads on large digital platforms are cheaper than traditional ones (see Figure 3 below). Moreover, in such a pricing model for digital advertising, a higher price reported by some respondents reflects the additional value the advertiser receives in terms of usability/accessibility. (Klemperer [1999](#)). The relatively higher growth in media consumption via the internet confirms that the value advertisers derive from digital is higher than from any other source of media consumption.<sup>6</sup>



**Table 2** Media Consumption, by Type

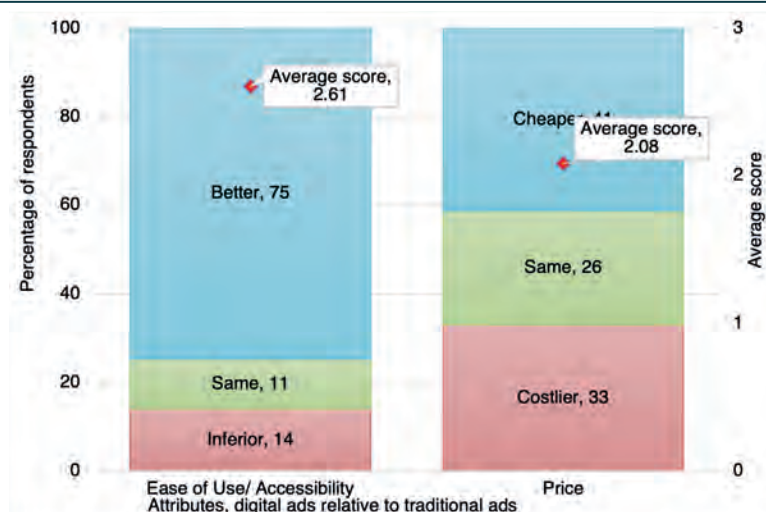
Type of source	2019: Q1	2019: Q2	2019: Q3	2019: Q4
TV	77	76	76	76
Newspaper	39	39	38	36
Magazine	6	5	5	5
Radio	20	20	20	20
Internet	24	29	35	41
Cinema	3	3	3	3
Total media consumption	82	83	83	83

Notes: The data is taken from the Indian Readership Survey (2019) of over one million users.

When asked about the ease of use/accessibility and price of digital ads compared to their traditional counterparts, the average respondent found digital ads easier to use/access at almost the same price. Further, the fact that 75 percent respondents found digital ads easier to use and only 33 percent found them costlier indicates that enterprises place a significantly higher value on digital ads than traditional ones. This implies that digital ads offer a useful value proposition for MSMEs in India, who are typically on a tight budget.

Several studies support this result. They have used experiments and found the impact of digital ads (Johnson et al. 2013, Lewis and Reiley 2014) resulted in a 100 percent increase in sales (Abraham 2008). Interestingly, in these studies, the effect of digital ads remains positive even several weeks after the experiments.

**Figure 3: Ease of Use of Advertising on Digital Platforms Compared to Traditional Ad Mediums, Relative to Price**



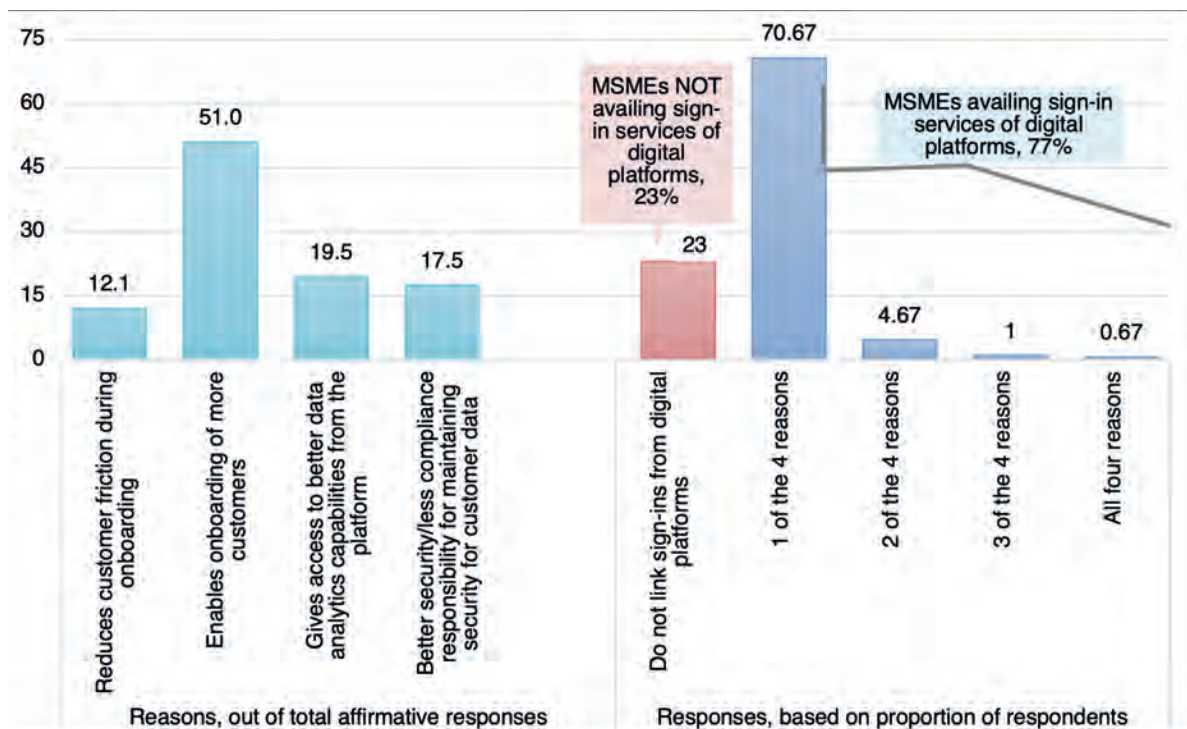
Notes: The average score is calculated as the mean value of the ratings (For 'ease of use/accessibility': inferior = 1, same = 2 and better = 3. For 'price': costlier = 1, same = 2 and cheaper = 3), weighted with the respective frequency. The data comes from a primary survey of 300 MSMEs conducted in January-February 2024.

# 4 Impact of Identification Services Like Single-Sign-on on MSME Customer Acquisition

An identity management service allows a third-party website to use a digital platform’s sign-on service to onboard customers. For example, an online retail website that allows customers to sign in using a Google, Facebook or Amazon account without creating a fresh one to complete the purchase. More importantly, users can authenticate themselves with an identity provider who then “vouches for the user to multiple service providers, absolving the service provider of the need to” confirm the users' identity themselves (Bauer et al. 2013). The single sign-on is extremely convenient for users because it doesn’t burden them with the management of multiple passwords. (Bauer et al. 2013).

The single sign-on facility also plays an important role in customer relationship management (CRM) for MSMEs for two main reasons (Trinh 2013). Firstly, these digital platforms have a captive base of billions of users who are potential customers for MSMEs. Secondly, the platforms also offer a range of services that are attractive to businesses. For example, many adopt Google’s single sign-on to utilise its cloud-based services such as Google App Engine, Google Serve, Google Analytics, etc.

**Figure 4: Single-sign on services of digital platforms, frequency of and reasons for MSME adoption**



Notes: The data comes from a primary survey of 300 MSMEs conducted in January-February 2024.

**The results of our survey (Figure 4) show that almost 8 out of 10 MSMEs rely on the identification services (single-sign on) of large digital platforms (Figure 4).** Customer onboarding is the main reason for MSMEs to use these identification services, ahead of others such as access to data analytics capabilities, better security/less compliance responsibility for customer data and the difficulty of onboarding users. These results point to the fact that **MSMEs utilise the identification services offered by large digital platforms primarily to grow, rather than to eliminate an existing limitation. This is understandable as most MSMEs in the current survey are young micro-enterprises.**

# 5 Perceived Impact of Draft Digital Competition Bill Provisions

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## A. Restrictions on Data Usage under Section 12(2)

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A key focus area of the Draft Digital Competition Bill<sup>7</sup> is the use of data by large digital platforms. According to the report of the CDCL, data serves as the primary medium of exchange in many platform markets where free services are on offer. The report suggests that large digital platforms amass “vast stores” of data which gives them a distinct competitive advantage due to feedback loops. A positive feedback loop includes the ability to collect data to improve quality of service and therefore add more customers. A monetisation feedback loop allows digital platforms to take advantage of aggregated user data to improve personalised advertisements, which in turn leads to greater revenue generation that can be used to improve quality of service, which again attracts more users.

The harms from platform data usage that the CDCL highlights are two-fold. First, consumer data feedback loops, in conjunction with network effects<sup>8</sup> and economies of scale,<sup>9</sup> tilt digital markets in favour of incumbents and prompt concentration in them. The dearth of competition, in turn, enhances the dependence of businesses and end-consumers on large digital platforms, making the latter gatekeepers in these markets. Second, the collection of consumer data leads to profiling, which jeopardises user privacy.

Two theoretical conclusions seemingly inform the the CDCL’s position. First, that data is a core input in digital production and distribution processes and the competitive relevance of firms increasingly hinges on timely access to relevant data (Cremer et al. [2019](#)). The corollary here is that firms have an incentive to monopolise such data, because it gives them a competitive advantage over newer entrants (Kramer et al. [2020](#)). Such a monopoly enables the incumbent to accumulate more data, wealth, and skilled human capital, thereby creating entry barriers. Second, the monopolistic effect is not restricted to the monopoly’s primary market, but could spill over into adjacent markets. The CDCL report voices the fears of stakeholders that once large digital incumbents enter adjacent markets, the accumulated data at their disposal may result in the foreclosure of newer entrants as the latter do not have access to the same volume of data.

### I. Pitfalls of Privacy-focussed Data Usage Restrictions under Section 12(2) of the Draft Digital Competition Bill, 2024

The CDCL’s proposed regulatory solution to disrupt the so-called data advantage of large digital platforms is to<sup>10</sup> place certain restrictions on data use. Specifically, Section 12(2) of the Draft Bill prohibits the SSDE from combining the personal data of end users and business users across different services without the consent of the former.

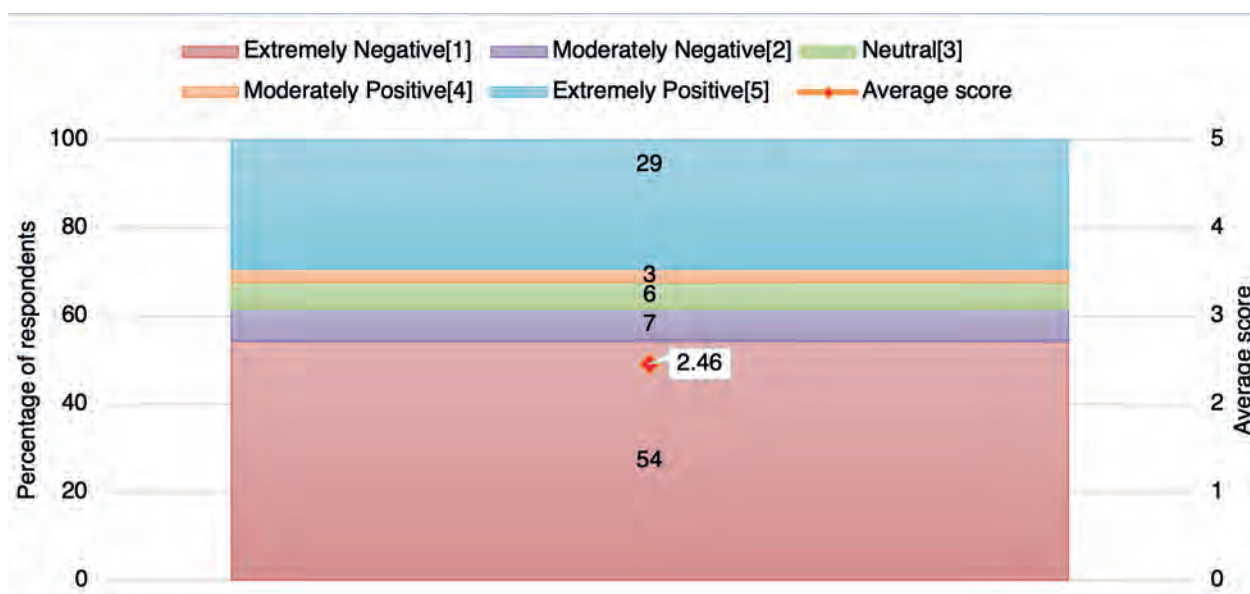
The restrictions on cross-using, combining, and sharing personal data in the DDCB are all enhanced privacy measures that seek to limit SSDEs to personalise advertising effectively. Illustratively, these provisions mirror Article 5(2)<sup>11</sup> of the DMA which places similar restrictions on the cross-using, combining, and processing personal data without consent. While the Draft Bill 2024 maintains that such consent would have the same meaning as laid down in the Digital Personal Data Protection Act, 2023, it is likely that a platform may have to put forth a separate and additional notice to obtain consent. Moreover, unlike the DMA which only requires end-user consent, the DDCB requires obtaining it from both end users and business users. It is uncertain where the doctrinal foundations of the personal data of a "business user" emanate from for two reasons. One, because it is unclear whether the fundamental right to privacy extends to legal persons in India. Two, India does not recognise property rights in mere data; rather there must be some creativity and effort devoted to creating a database in order for the copyright to be granted. The business user, as a customer of a platform, does not satisfy these requirements. Moreover, it is uncertain whether a competition law can introduce a new set of IP rights.

Another way in which the DDCB goes beyond the DMA is the prohibition on permitting the use of "personal data of end users and business users" by a third party without their consent. Ostensibly, the restriction is a duplication of the consent requirement under the Digital Personal Data Protection Act, 2023 in the case of end users, and would serve as an additional point of friction for users as it would likely be a separate opt-in requirement from the data protection law. There is a considerable body of literature outlining the potential pitfalls of introducing privacy-focused data usage restrictions on large digital platforms. The most immediate and drastic effect is the potentially negative impact on targeted advertising. (Cennamo [2023](#)) points out how such a measure can disrupt targeted advertising by citing the example of the Apple App Tracking Transparency (ATT) feature, which was introduced in September 2020. With ATT, users had to give express consent to being tracked when using apps across their iPhone. Initially, only 21 percent of users opted in, which later increased to 40 percent (Klosowski [2022](#)). Cennamo and Santalo ([2022](#)) found that this measure disrupted the results of all companies reliant on targeted advertising to reach their intended audiences.

Kircher and Foerderer ([2023](#)) evaluated the effects of such a disruption in the context of Google's ban on targeted advertising for children's games on Android in 2019. The authors found that the ban led to substantial "app abandonment"; in other words, developers released fewer updates and fixed software bugs less frequently. It also reduced the spectrum of available apps and the revenues their developers were able to garner. This adverse impact came from young and undiversified firms. Specifically, 3270 children's games were delisted following the ban, during the study's observation period.

In the current survey, **61 percent of respondent MSMEs reported that the reduced efficacy of targeted advertising on SSDEs due to a government regulation or law would negatively impact on their business.** This is a significant finding as digital ads have a major impact on customer acquisition and revenue generation for MSMEs (see Figure 2), which can be a make-or-break factor for MSMEs.

**Figure 5: Perceived impact reported by respondent MSME business if the online platform they advertise on becomes ineffective (due to a government regulation/law) i.e., is unable to target ads to their intended audience**



**Notes:** The question was asked on a 5-point Likert scale. The data comes from a primary survey of 300 MSMEs conducted in January-February 2024.

## II. Tying and Bundling Restrictions under Section 15 of the Draft Digital Competition Bill, 2024 Will Negatively Impact Access to Single-Sign on Services for a Majority of MSMEs

Section 15 of the Draft Digital Competition Bill, 2024 prohibits SSDEs from requiring or incentivising business users or end users to use one or more of the SSDE’s other products or services. A plain reading of the provision suggests that a bundle of products – say a bundle of Google Cloud, Google single sign-on, and Google Analytics – would be illegal under the DDCB. Further, if a large digital platform offers the sign-on feature as a free add-on for advertising services, it would not be able to do so.

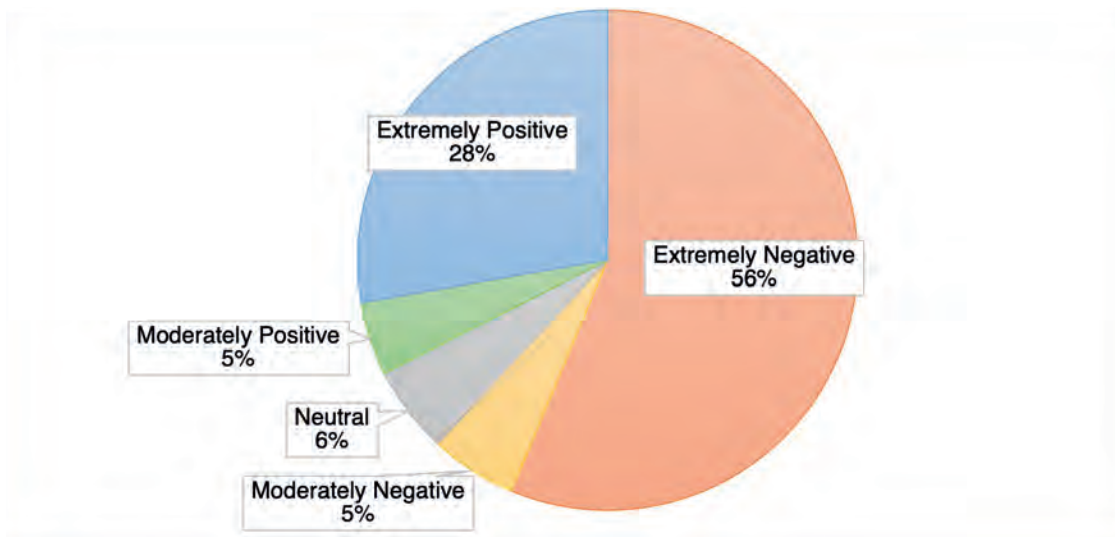
Unbundling may have the unintended effect of making these services more expensive (Hollenberg and Vossen, 2023). This is because the price of unbundled services is higher than their bundled counterparts (Song and Li 2018), as bundling exploits cost and value synergies to drive down prices (Tanriverdi 2006). As a result, the price increases may reduce the ability of businesses to access SSDE services, including single sign-on, or lead to higher costs for end-users if these prices are passed on to them by the business users. Passing on the higher costs to end-users is more likely than discontinuing the use of the gatekeeper’s platform if there are no viable alternatives (Hollenberg and Vossen, 2023).

The EU’s DMA recognises the importance of the bundling of single sign-on services for businesses and notes that the availability of such facilities enables them to optimise their operations. However, it also suggests that such services are being forced on businesses, as large digital platforms make their use dependent on the use of other features. This in turn hinders the freedom of businesses to choose alternative services to those of the large digital platform. The

DMA notes that this alleged practice also allows digital platforms to accumulate data. Therefore, it prohibits large digital platforms from forcing businesses to interoperate with or use their identification services. Kramer et al. (2020) suggest that forcing platforms to divest themselves of such activities would also facilitate market entry and the growth of independent businesses to provide these important services. The report of the CDCL does not detail the potential demerits of tying and bundling services by large digital platforms, only noting that it may be anti-competitive in some contexts, and pro-competitive in others (Govil et al 2024).

However, our survey shows that **6 out of 10 MSMEs would be negatively affected by any restrictions on sign-in services of digital platforms (Figure 6)**. This number is twice as high as that of those in favour of such restrictions. Together with the results in Figure 4, this confirms that sign-in services of digital platforms are important for the majority of MSMEs. They need them to not just acquire customers but also to mobilise investments and propel growth.

**Figure 6: Perception of MSMEs on the impact on their business if they were unable to allow customers to login to their service/website through existing accounts from large digital platforms (due to a government regulation)**

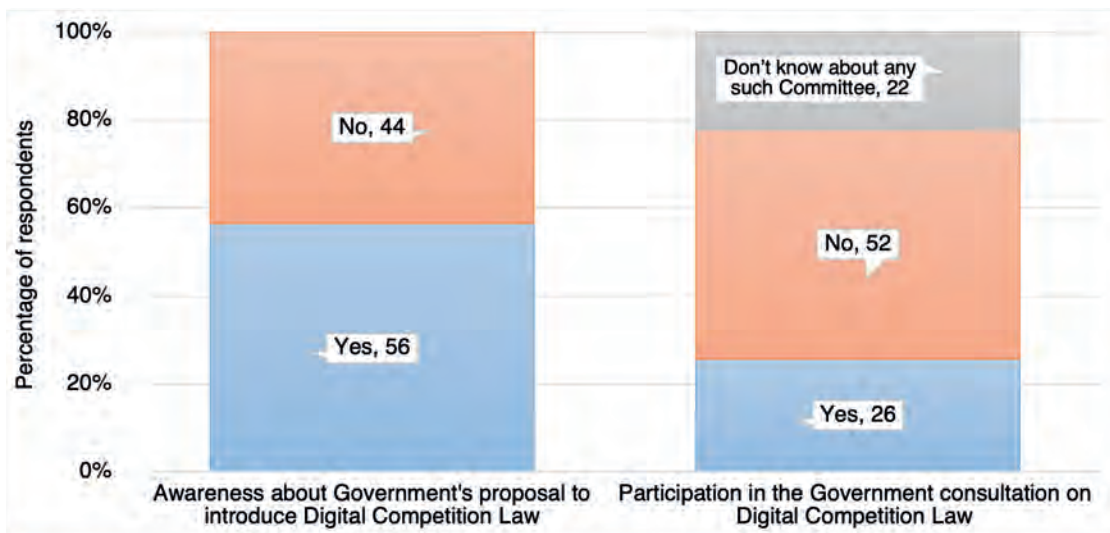


Notes: The question was asked on a 5-point Likert scale. The data comes from a primary survey of 300 MSMEs conducted in January-February 2024.

## 6 Awareness about Prospective Provisions of Digital Competition Law

Overall, our study suggests that the relationship between large platforms and their business users in India is symbiotic. It raises a critical question: why is the Government opting for ex-ante regulation with so many potential negative consequences for the latter? The first possible reason is the lack of inclusivity in the CDCL’s consultation process, in which only the invited stakeholders had their say. The problem with such a model is that it may not paint an accurate or holistic picture of the trade-offs in ex-ante competition regulation. Illustratively, **74 percent of survey respondents did not participate in the CDCL consultations and 22 percent of them were not even aware of the committee’s existence (Figure 7)**. This is not to suggest that the 26 percent that indicated that they participated in the consultations on the DCL actually did. A perusal of the stakeholders that made submissions before the CDCL indicates that no MSME participated individually and that there were only two associations that could have MSMEs as members. Thus, it is likely that the 26 percent of respondent MSMEs that indicated their participation in CDCL may be members of these associations.

**Figure 7: Awareness about prospective provisions of Digital Competition Law**



Notes: The data comes from a primary survey of 300 MSMEs conducted in January-February 2024.

The CDCL's restricted consultation process raises another pertinent question: Who should a prospective DDCB seek to benefit? Overall, those who indicated that they would gain from its outcomes, made up around 30 percent of our respondent pool (see Figures 5 and 6). It follows that the potential benefits of an untested regulatory construct would only accrue to a minority of business users or commercial stakeholders. Specifically, these benefits would only accrue to the competitors of SSDEs, and not the MSMEs. In such a case, does it make sense to introduce a law that would affect most small businesses adversely?



## 7 Conclusion

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To reiterate, digital platforms enable MSMEs to optimise their limited resources, enabling the former greater access to markets and competitiveness. One key lever of optimisation that platforms offer to MSMEs is targeted advertising. It allows small businesses to stand out, engage with customers more effectively, and maintain ongoing relationships through timely updates on relevant offers. Our survey of 300 MSMEs confirms the positive impact of digital advertising on revenue generation, cost and time savings, and customer acquisition, both in India and abroad. Moreover, a significant majority of MSMEs find advertising on large digital platforms better in terms of ease of use and accessibility compared to traditional advertising mediums. These findings underscore the importance of considering the synergic relationship between digital platforms and MSMEs while drafting digital competition laws to avoid jeopardizing efficiency gains in the sector.

Restrictions on data usage by large digital platforms will only undermine the interests of MSMEs. Our survey reveals that 6 out of 10 of surveyed MSMEs would be negatively impacted by any regulation that reduced the efficacy of personalised advertising. Similarly, the restriction on tying and bundling will prevent MSMEs from accessing a suite of services that help them digitise their businesses and optimise resources. Key among these is the single sign-on service which enables an MSME to leverage the large user base of a digital platform and reduce friction in customer onboarding. The tying and bundling restrictions set forth in the DDCB threaten to make single sign-on services inaccessible to MSMEs, which would again negatively impact a majority of these entities.

The DDCB's narrow focus on the competitive dynamic between businesses and large digital platforms may emanate from the fact that consultations on the drafting of the law were restricted. A majority of the MSMEs surveyed (74 percent) indicated that they did not participate in the consultations and 22 percent were not even aware of the existence of the CDCL. To repeat, the limited consultation process prompts a crucial question: Who should benefit from a potential Digital Competition Law, regarding targeted advertising and single sign-on services? Our survey reveals that only companies that directly compete with SSDEs would benefit from this law, while the impact on a majority of MSMEs would be negative. This suggests that the advantages of a new, unproven regulatory framework might only extend to a handful of business users or stakeholders. Consequently, it is hard to justify implementing a law that could have negative consequences for the majority of small businesses.

**In light of these considerations, we recommend that the Ministry of Corporate Affairs withdraw the provisions pertaining to restrictions on data usage under Section 12(2) of the DDCB and tying and bundling under Section 15. We also implore the Ministry to adopt a wait-and-watch approach and learn from the experience of the European Union and its experiment with the DMA, to further understand the ramifications of introducing ex-ante competition laws that do not consider the nature of stakeholder interactions in a digital ecosystem holistically.**

## ENDNOTES

- 1 The MSME Development Act of 2006, the revision of which was announced as part of the Aatma Nirbhar Bharat package on 13 May 2020, contains the definitions of micro, small and medium enterprises (Ministry of MSME, [2022-23](#)). A micro enterprise is an enterprise whose investment in plant and machinery or equipment is not more than Rs. 1 crore and whose turnover is not more than Rs. 5 crores. A small enterprise is an enterprise whose investment in plant and machinery or equipment does not exceed Rs. 10 crore and whose turnover does not exceed Rs. 50 crores. A medium enterprise is an enterprise whose investment in plant and machinery or equipment is not more than rupees fifty crores and whose turnover is not more than rupees two hundred and fifty crores.
- 2 Please see Union, European. Digital Markets Act, 2022/1925 (2022). <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022R1925>.
- 3 Please see Article 5(2) Union, European. Digital Markets Act, 2022/1925 (2022).
- 4 Please see Parliamentary Standing Committee on Finance. 'Anti-Competitive Practices by Big Tech Companies'. New Delhi: Lok Sabha Secretariat, December 2022. [https://loksabhadocs.nic.in/lssccommittee/Finance/17\\_Finance\\_53.pdf](https://loksabhadocs.nic.in/lssccommittee/Finance/17_Finance_53.pdf).
- 5 Please see Govil, Manoj, Ravneet Kaur, Aditya Bhattacharjea, Haigreve Khaitan, Harsha Vardhana Singh, Pallavi Shardul Shroff, Anand Pathak, Rahul Rai, and Manoj Pandey. 'Report of the Committee on Digital Competition Law'. Ministry of Corporate Affairs, 12 March 2024. <https://www.mca.gov.in/bin/dms/getdocument?mds=gzGtvSkE3zIVhAuBe2pbow%253D%253D&type=open> and Union, European. Digital Markets Act, 2022/1925 § (2022).
- 6 Table 2 contains data from the latest Indian Readership Survey, which refers to the year 2019. In subsequent years, the growth of media consumption over the internet is only likely to accelerate as the pandemic has led to a huge shift in service delivery from the traditional to the digital space. See De et al. ([2020](#)) and Mukherjee and Narang ([2022](#)) for a detailed discussion.
- 7 In December 2022, a Parliamentary Standing Committee on Finance issued a report on the anti-competitive practices of large technology companies. The report evaluated the business models of these entities as well as certain types of conduct, and made recommendations to remedy possible harms to competition emanating from these factors. It also suggested that India introduce a digital competition law to identify and rein leading players in digital markets that may negatively influence competitive conduct. Following the recommendations of the Standing Committee, the Indian Government constituted a Committee for Digital Competition Law in February 2023. Broadly, the CDCL's mandate to evaluate whether the provisions of the extant competition law, the Competition Act, 2002 were adequate to meet the challenges presented by the digital economy and prescribe an ex-ante framework to manage digital markets through a separate legislative mechanism, the Digital Competition Act or Law.  
  
The prospective Digital Competition Law is expected to be based largely on the form and structure of the European Union's Digital Market Act. The CDCL was largely guided by the recommendations of the standing committee report, which, in turn, borrowed considerably from the Digital Markets Act, almost verbatim in many instances.
- 8 As per the CDCL report, the term "network effects" refers to increased utility that a user derives from a service when the number of other users consuming the service increases.
- 9 As per the CDCL report, the term "economies of scale" refers to a reduction in the per-unit cost of production of a good/service with an increase in the amount produced.
- 10 The obligation regarding data usage also restricts SSDEs from using non-public data of business users to compete with them and requires the former to enable both end-consumers and business users to port their data. However, these provisions are beyond the scope of this study.
- 11 Article 5(2) of the DMA provides that [t]he gatekeeper (the DMA's version of an SSDE) shall not do any of the following: (a) process, for the purpose of providing online advertising services, personal data of end users using services of third parties that make use of core platform services of the gatekeeper; (b) combine personal data from the relevant core platform service with personal data from any further core platform services or from any other services provided by the gatekeeper or with personal data from third-party services; (c) cross-use personal data from the relevant core platform service in other services provided separately by the gatekeeper, including other core platform services, and vice versa; and (d) sign in end users to other services of the gatekeeper in order to combine personal data, unless the end user has been presented with the specific choice and has given consent within the meaning of Article 4, point (11), and Article 7 of Regulation (EU) 2016/679. Where the consent given for the purposes of the first subparagraph has been refused or withdrawn by the end user, the gatekeeper shall not repeat its request for consent for the same purpose more than once within a period of one year.

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