Too small to matter?

AI agents, open protocols and the MDPMI ad-tech remedies

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19 November 2026

Executive summary

In its Media and Digital Platforms Market Inquiry, the Competition Commission concluded that structural remedies in advertising technology "are unlikely to attract buyers and competition given the small market size" (¶333). It chose instead to extend to South Africa the remedies imposed on Google in the European Union and the United States (Annexure 8, clause 8). Google may apply to vary that extension where a remedy is "not suitable for implementation in South Africa" (clause 8.4(i)).

This paper argues that AI agents buying media weaken the small-market premise. The Commission should bear that in mind when remedies from the EU arrive.

Findings

1. **The premise in ¶333 is the most likely ground for a future variation.** An application to narrow an EU remedy in South Africa could rely on the Commission's own reasoning, without new evidence.
2. **The cost of reaching buyers is part of the cost of entry.** Alongside production scale and network effects, the cost of finding, contracting with, settling with and proving delivery to buyers has been paid separately by each entrant in South Africa.
3. **Agentic buying moves that cost into shared infrastructure.** When agents buy over a shared protocol, most of the cost of reaching buyers is paid once, not by each entrant for each buyer. This lowers the market size needed to support entry.
4. **Demand is no longer "the SA market alone".** Agents acting for advertisers elsewhere in Africa can reach South African inventory, including community media, screens and newsletters that programmatic channels do not reach.
5. **A credible alternative can weaken Google's network effects.** Findings 3 and 4 give publishers and advertisers a route to each other that does not depend on South African market size alone.
6. **The mechanism is conditional.** It depends on agent protocols remaining open and interoperable, on agents not steering demand toward their providers, and on agents reaching Google Ad Manager inventory. Where these conditions fail, the premise in ¶333 may still hold.
7. **The route already exists.** The Commission's remedial actions already provide for EU outcomes to reach South Africa. What is needed is scrutiny of any attempt to narrow them.

The request. When interoperability remedies from the European Commission's ad-tech case (AT.40670) are extended to South Africa, the Commission should ensure they are not narrowed in a way that excludes AI agents acting for buyers and sellers. If the EU outcome expressly gives agents access, the Commission should extend it without dilution. In both cases, access should be neutral as to which open agent protocol is used, and should include inventory sold through Google Ad Manager.

The paper does not ask the Commission to reopen the Inquiry or to impose new remedies.

Interest. This paper is published by Diretsa, an agent-bookable marketplace for South African media, which has an interest in the outcome it argues for. Diretsa appears in section 6 as a working example, not as evidence of scale, and will make its underlying data available to the Commission on a confidential basis.

1. The finding we are responding to

1.1 What the Commission found

The Inquiry found that Google's position across the advertising technology stack has a substantial adverse effect on competition. It located the source of that position in network effects: "websites choose Google supply-side to access quality advertisers and advertisers choose Google demand-side to access quality inventory" (¶329.1). Google's ad server, Google Ad Manager, is "super-dominant in SA, accounting for over 90% of ad serving", and "all the major SA news media are GAM ad server clients" (¶295). Opacity in the value chain "limits advertiser shifts to direct deals" (¶330.2).

On remedies, the Commission reasoned (¶333):

> *"The Inquiry is of the view that remedies in the Adtech stack that are implemented piece-meal in SA are unlikely to be effective. Structural remedies are unlikely to attract buyers and competition given the small market size, and similarly certain behavioural remedies such as an end to YouTube exclusivity will not be effective as competitors are unlikely to invest in exploiting these new opportunities for the SA market alone."*

It concluded that "extending these remedies to SA offers the most practical outcome" (¶333). Google is to implement in South Africa the commitments made binding by the French Autorité de la concurrence in 2021, and to extend to South Africa structural remedies arising from the EU and US ad-tech proceedings and behavioural remedies arising from the EU proceeding (¶334; Annexure 8, clause 8).

1.2 Why the premise was reasonable

This paper does not argue that ¶333 was wrong. On the evidence before the Inquiry, the premise was sound. A rival to Google's stack in 2025 would have had to recover its investment from South African demand alone, and section 2 explains why that made entry unlikely.

The paper is about what happens next. The remedial actions run for five years (Annexure 8, clause 10.1). During that period, outcomes from the EU and the US will reach South Africa, and Google may apply to vary them.

1.3 The same premise, in a future variation application

Clause 8.4 allows Google to apply to vary the extension of an EU behavioural remedy "on good cause". The first ground listed is that "such remedies implemented in the EEA are not suitable for implementation in South Africa"; another is "any other reason why it is not appropriate to extend such remedies to South Africa".

The most natural argument for unsuitability is the one the Commission itself accepted in ¶333: that the South African market is too small for a remedy designed elsewhere to produce competition here. An application on that ground would not need new evidence.

Finding 1. The premise in ¶333 is the most likely ground for any future application under clause 8.4(i) to narrow or remove an EU remedy in South Africa. Whether that premise still holds when such an application is made is a live question for the Commission.

1.4 Two readings of ¶333

¶333 can be read in two ways, and this paper does not ask the Commission to choose between them.

On the **market-size reading**, South African demand alone could not repay entry. The words "given the small market size" and "for the SA market alone" support it.

On the **jurisdictional reading**, the constraint is the reach of a national authority over a business organised globally; remedies "implemented piece-meal in SA" would be ineffective. Others have reasoned this way. The UK Competition and Markets Authority noted that it "would need to consider the feasibility of the UK acting unilaterally" in separating Google's businesses (CMA, 2020, ¶101). In the US Ad Tech Case, the court declined in September 2026 to order the sale of Google's ad exchange, finding that "structural remedies are neither realistic nor needed" and that a sale would be "incredibly messy and highly risky" (*United States v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.), as reported in National Law Review, 2026). A commentator on the Inquiry argued that re-engineering advertising markets "was always beyond what a Global South competition authority could realistically enforce" (Markovitz, 2025).

The readings are not exclusive. Section 5 explains why the request in this paper holds under either.

2. Why the premise held

2.1 Market size and the cost of entry

Bresnahan and Reiss (1991) estimated how large a market must be to support one or more firms: "The larger fixed costs or the lower variable profits, the greater the market size needed to support a single entrant" (p. 980). An entrant must recover its fixed costs from the profit it earns per customer.

Competition policy for small economies builds on this. Gal (2003) argues that a small economy can support only a few firms operating at minimum efficient scale, and characterises its barriers as "High entry barriers — Minimum efficient scales — Supply constraints" (Gal, 2012). Applying this to remedies, Paas (2008) notes "the difficulty of finding a suitable purchaser" for divested assets in small economies. This is the reasoning ¶333 applies to advertising technology.

In that literature the decisive fixed costs are mainly costs of production. Digital markets add network effects, data and scale, which expert reports identify as the main sources of entrenchment (Lancieri & Sakowski, 2021). The Commission's own account rests on network effects (¶329.1).

2.2 The cost of reaching buyers

The same literature recognises a further component of fixed cost: the cost of reaching buyers.

- Studies of barriers to entry in South Africa list "routes to market" ("It is critical that the business must be able to reach consumers") and treat advertising as "a very large (and sunk) cost which needs to be incurred in order to enter" (Roberts, 2016).
- The Australian Competition and Consumer Commission found that in ad tech "the need to enter with volume is a key barrier", because an entrant must "support integrations with a large number and variety of parties" (ACCC, 2021, p. 75).

- The CMA found that “transaction costs faced by advertisers in using multiple search engines … create a barrier to entry for smaller rivals” (CMA, 2020, ¶5.58).

This cost does not shrink in proportion to the market. An entrant must still find buyers, agree terms, collect payment and prove delivery, and each entrant must do so for itself.

2.3 How this cost appears in South African media

The Commission recorded CPMs of R50–150 for direct sales against R5–15 for programmatic sales (¶100). Direct deals pay more, but they require the seller to find and serve buyers itself, and opacity “limits advertiser shifts to direct deals” (¶330.2). Smaller media cannot carry the cost: “many community media lack a website, preferring to build their social media presence” (¶44), and there is “no audience measurement for community media”, which “limits their ability to get advertising revenues” (¶338.1).

An intermediary seeking to compete with Google’s stack would face the same cost, in a market too small to repay it quickly. That is the situation ¶333 describes.

Finding 2. Alongside production scale and network effects, the cost of reaching buyers is a recognised barrier to entry. In the South African advertising market it has been paid separately by each entrant and repeated for each buyer relationship.

The paper does not claim that this cost is *the* reason small markets struggle to attract entry. The claim is narrower: it is one component of the fixed cost of entry, and it is the component that agentic buying changes.

3. What changes when agents buy

3.1 The cost of selling moves into shared infrastructure

The cost of selling advertising has six components. When AI agents buy over a shared protocol, most of them change form:

Component	How it has been paid	When agents buy over a shared protocol
Discovery	Sales staff, agency relationships, rate cards sent by email	Inventory is published once in machine-readable form; any compliant buying agent can find it
Terms and contracting	Negotiated per buyer, per campaign	Price, format and ad rules are published as structured terms that an agent accepts or declines
Payment and settlement	Invoices, transfers, credit risk carried per buyer	Budgets are held before delivery and released on proof
Proof of delivery	Screenshots and publisher reports, contested case by case	Delivery is counted by a shared ad server, player or tag, or evidenced by the publisher under common rules
Dispute resolution	Bilateral and informal	Decided on the delivery evidence under common rules
Audience measurement	Absent for community media (¶338.1)	**Unchanged.** Agentic buying does not supply independent measurement

The change is not that these costs disappear. Five of the six stop being paid per entrant and per buyer; they are paid once, in the protocol and the infrastructure around it. Goldfarb and Tucker (2019) organise the economics of digital markets around falling search, replication and verification costs. This shift combines all three: search costs fall because inventory is machine-readable, replication costs fall because the integration is built once, and verification costs fall because delivery evidence follows a common standard. The sixth component, audience measurement, is not changed, and remains a gap for community media.

Recent work anticipates the transaction-cost side of the argument. Shahidi et al. (2025) describe AI agents as producing “efficiency gains through reduced transaction costs” as well as “efficiency losses through increased frictions”. Gal and Elkin-Koren (2017) argued that “new suppliers might be able to enter the market more easily if reputation, past transaction history, and physical infrastructure are given lesser weight than parameters such as price and quality” (p. 329). The Autorité de la concurrence (2026) reaches the converse finding: in agentic commerce, “the lack of standardised data or established protocols” favours larger incumbents. The protocol layer, more than the agents themselves, determines whether the cost of selling is shared or repeated.

Finding 3. When media is bought by agents over a shared protocol, most of the cost of reaching buyers changes from a recurring, per-entrant cost to a largely one-off, shared one. This lowers the fixed cost an intermediary must recover in South Africa, and with it the market size needed to support entry.

3.2 Demand is no longer “the SA market alone”

¶333 assumes that the buyers an entrant can serve are, in practice, South African. Agents loosen this assumption. An agent acting for an advertiser in Lagos, Nairobi or Accra can discover, book and verify South African inventory at the same cost as one acting for an advertiser in Johannesburg, provided the inventory is published over a protocol the agent supports.

This matters most for inventory the existing stack does not reach. “Many community media lack a website” (¶44), and “more community media have Facebook pages than websites” (¶161). Such inventory, together with screens and newsletters, is largely outside programmatic channels. Before agents, a buyer outside South Africa had no practical way to find it, contract for it or verify that an ad ran.

It also matters for inventory inside Google’s stack. Because all the major South African news media use Google Ad Manager (¶295), a credible alternative must allow agents to reach that inventory on non-discriminatory terms. This is the link to the remedy in section 5.

Diretsa has observed demand of this kind from brands headquartered elsewhere in Africa. This is the observation of an interested party, and Diretsa will make the underlying booking data available to the Commission on a confidential basis.

Finding 4. Agentic buying widens the pool of buyers that can reach South African inventory beyond South Africa, most of all for inventory that programmatic channels do not reach. The relevant market for an entrant is therefore not “the SA market alone”.

3.3 A credible alternative

The Commission located Google’s entrenchment in indirect network effects (¶329.1). Such effects weaken when either side has a credible alternative way to reach the other. Findings 3 and 4 describe how one can arise: selling becomes cheap enough to sustain an alternative channel in a small market, and the buyers on that channel are not limited to South Africa. In terms of the entry condition, Finding 3 lowers the fixed cost to be recovered and Finding 4 enlarges the customer base from which profit is earned. Both lower the market size needed to support an alternative to the incumbent stack, and both make possible the shift to direct deals that ¶330.2 found opacity to limit.

This paper does not claim that such an alternative will discipline Google’s terms. Advertisers can use both channels at once, and agents may concentrate demand (section 4). The claim is that interoperability between Google’s stack and open agent protocols makes that discipline possible, under conditions that can be identified and monitored.

Finding 5. Agentic buying over open protocols gives publishers and advertisers a credible alternative route to each other that does not depend on the size of the South African market alone. A credible alternative is the condition under which the network effects identified in ¶329.1 can weaken.

3.4 What has not been argued before

A scoping search of the economics, competition-law and policy literature on 19 November 2026 found prior work on each element above: small economies and the viability of structural remedies (Gal, 2003; Paas, 2008); transaction costs and AI agents (Shahidi et al., 2025; Gal & Elkin-Koren, 2017); interoperability as a remedy (Crémer et al., 2019; Scott Morton et al., 2023); and open protocols in

agentic commerce (Autorité de la concurrence, 2026). It found no published analysis connecting AI agents or shared protocols to the market size needed for entry in small markets, or to a remedy rejected on market-size grounds.

4. The risks, stated plainly

4.1 The shared layer may not be shared

Finding 3 depends on buyers and sellers converging on a small number of interoperable protocols. They have not yet done so. The Ad Context Protocol (AdCP) describes itself as "the open protocol that lets AI agents discover, plan, buy, sell, and measure media across every channel" (AgenticAdvertising.org, 2026). IAB Tech Lab has published a separate Agentic RTB Framework (IAB Tech Lab, 2025) and an agentic roadmap from which, according to trade press, AdCP was "noticeably absent"; its chief executive warned against "multiple new standards that create fragmentation" (Clark, 2026). If protocols fragment, part of the cost that Finding 3 treats as one-off will recur.

The Autorité de la concurrence (2026) warns that new entrants may face "having to comply with standards they did not help establish", and that standards governance may be centralised "in the hands of a limited number of operators". It recommends that agentic commerce standards be "developed and maintained through transparent, open and collaborative processes" (Recommendation 6). A protocol nobody owns in law can still be shaped in practice by its largest members. Finding 3 is a claim about what shared protocols make possible, not a claim that the industry has converged.

4.2 Agents are not free to run

Shahidi et al. (2025) observe that "training foundation models incurs high fixed costs while operating agents incurs mostly variable costs". The Autorité de la concurrence (2026) finds that the cost of running agents "substantially exceeds that of training and increases in proportion to the use of the AI agent". Some of the cost of selling therefore moves into a variable cost of operating agents, not into shared infrastructure. Finding 3 concerns the cost of *reaching* buyers, not the total cost of transacting.

4.3 Agents may concentrate demand, and become gatekeepers

This is the most serious risk to Finding 5.

- Experimental studies find that AI shopping agents tend to concentrate demand on a few products, are sensitive to the position of options, and change their choices when the underlying model is updated (Allouah et al., 2025). A simulation of two-sided agent markets found large advantages for sellers that respond first, and welfare that falls as markets grow (Bansal et al., 2025).
- Shahidi et al. (2025) expect concentration among agent providers that "mirrors the concentration in the foundation model industry", and warn that agents supplied by a platform "may steer outcomes toward the platform's interests, and can contribute to platform lock-in". Bostoen and Krämer (2025) describe the risk that "AI agents become gatekeepers in their own right and use that position to anticompetitively steer demand". Ezrachi and Stucke (2016) raised the same concern about a trusted "digital butler".

- Athey and Scott Morton (2025) model a small open economy importing AI from providers with market power, and find that rents can flow abroad.
- Advertisers can buy through Google and through agents at once, so an alternative channel can grow without changing Google's terms.

Finding 5 is therefore not guaranteed. Whether network effects weaken depends on the conditions in section 4.5.

4.4 AI assistants are outside the route this paper proposes

Small advertisers are likely to reach agentic buying through general-purpose AI assistants such as Claude, ChatGPT and Copilot, not specialised buying agents. The route in section 5 does not clearly reach them. The EU-import clause in Annexure 8 applies to Google's ad-tech remedies. The remedies agreed with AI companies concern content monetisation and opt-outs; OpenAI's, for example, provides training for publishers on opt-out controls, and none contains an EU-import clause. EU coverage of agents is itself contested: Göhsl (2025) argues that AI shopping agents fall outside the Digital Markets Act's core platform services, while Bostoen and Krämer (2025) argue they can be treated as virtual assistants.

This paper does not propose a remedy for AI assistants. An assistant that steered bookings to its own platform's inventory would undo the mechanism in section 3 from the buyer's side. It is an open risk.

4.5 What the argument does not touch, and what can be watched

Two further limits apply. First, Sutton's (1991) theory of endogenous sunk costs, supported by Robinson and Chiang (1996), implies that barriers built on winning buyers matter most in *large* markets, so lowering them may help large markets more than small ones. The argument does not depend on South Africa gaining more than others, only on it gaining enough that reasoning of the ¶333 kind no longer holds. Second, in newspapers, market size works mainly through the fixed cost of content quality (Berry & Waldfogel, 2010). Agentic buying does nothing to reduce the cost of producing journalism.

The mechanism in section 3 depends on four conditions:

1. agent protocols for media buying remaining open, published and interoperable;
2. agents, including AI assistants, not steering bookings toward the inventory of the platform that supplies them;
3. Google Ad Manager inventory being reachable by third-party agents on non-discriminatory terms;
4. inventory outside programmatic channels being bookable and verifiable by agents.

The remedial actions require Google to report on compliance and to provide information on "the impact thereof" (Annexure 8, clause 11). On our reading, that channel could be used for conditions 1 and 3. Conditions 2 and 4 fall outside the existing remedies and would need to be observed in the market.

Finding 6. The mechanism in section 3 is conditional on open and interoperable agent protocols, on agents that do not steer demand toward their providers, and on agent access to Google Ad Manager inventory. Where these conditions fail, the premise in ¶333 may continue to hold.

5. What this means for remedies

5.1 How EU and US outcomes reach South Africa

Annexure 8 provides three routes (clause 8):

- any **structural** remedy implemented by Google following the EU Ad Tech Investigation (Case AT.40670) or the US Ad Tech Case is to be extended to South Africa within six months (clause 8.2);
- any remedy ending DV360 exclusivity for YouTube emerging from a European Commission investigation is to be extended within six months (clause 8.3);
- any **behavioural** remedies ordered in the EU Ad Tech Investigation are to be extended within twelve months of implementation in the EEA (clause 8.4).

Under clause 8.4 Google may apply to vary the obligation "on good cause", including that the remedies "are not suitable for implementation in South Africa". A variation may remove the requirement or amend the remedy's "nature and/or scope". On our reading of clause 13, it is Google that applies to the Commission, with a further application to the Tribunal open to Google, which the Commission may oppose.

The route is specific. It imports outcomes of the EU Ad Tech Investigation and structural outcomes of the US Ad Tech Case. It does not import future obligations under the EU Digital Markets Act, which appears in the remedial actions only as the source of a fixed set of price-transparency metrics (clause 7.2.1).

5.2 Where the EU and US cases stand

The European Commission fined Google €2.95 billion in September 2025 and gave it sixty days to propose measures (European Commission, 2025). Google proposed behavioural measures in November 2025, reported to include "greater interoperability of its tools". The Commission extended its own timetable in March 2026 and, as of September 2026, was still assessing the proposal, with no fixed deadline (Kirkwood, 2026).

In the United States, the court declined to order a divestiture and adopted behavioural remedies covering interoperability, data sharing, non-discrimination and monitoring, for six years (National Law Review, 2026; Montoya, 2026). Whether those remedies apply outside the United States is not settled in the sources available. Clause 8.2 imports only US *structural* remedies, so South Africa cannot rely on that route for them.

The likely EU outcome is therefore behavioural, and interoperability is part of it. None of the measures proposed or ordered so far, as reported, mentions AI agents.

5.3 The request

Primary request. When interoperability remedies from the EU Ad Tech Investigation are extended to South Africa under clause 8.4, the Commission should ensure they are not narrowed in a way that excludes AI agents. Where the remedy as implemented in the EEA allows third parties to interoperate

with Google's advertising tools, agents acting for buyers or sellers should be able to do so in South Africa on the same terms.

Fallback request. If the EU outcome includes a remedy that expressly gives AI agents access to Google's advertising stack, the Commission should extend it to South Africa without dilution.

Three conditions apply to both:

1. **No narrowing on grounds of size.** Any narrowing of agent access should be treated as a material variation, attracting the same scrutiny as removal of the remedy.
2. **Protocol neutrality.** Access should be available through any open, published agent protocol on non-discriminatory terms. It should not be satisfied only through a protocol Google controls, and it should not require any particular third-party protocol. This paper does not ask the Commission to prefer any protocol, including the one Diretsa uses.
3. **Google Ad Manager inventory included.** Since all the major South African news media use Google Ad Manager (¶295), an extended remedy should not exclude that inventory.

The primary request does not ask the Commission to expand an EU remedy beyond its terms, only to ensure that the South African version is not narrower than the European one where agents are concerned.

5.4 Why the request holds under either reading of ¶333

On the **market-size reading**, a variation application under clause 8.4(i) would rest on the premise that a remedy designed for a large market brings no benefit in a small one. Findings 3 to 5 bear directly on that claim: agentic buying lowers the market size needed to support an alternative channel, and the buyers on that channel are not limited to South Africa.

On the **jurisdictional reading**, the request does not ask the Commission to design or enforce a remedy beyond its reach. The remedy is designed and enforced in the EU. The Commission's role is limited to the power it already holds under clause 8: to decline a variation that would narrow the remedy's application in South Africa.

5.5 Questions for a variation application

If Google applies to narrow or remove an interoperability remedy for South Africa, the Commission could ask:

1. Does the application rely on the size of the South African market, and if so, does it account for buyers outside South Africa reaching South African inventory through agents (Finding 4)?
2. Does it assume that the cost of reaching buyers in South Africa is recurring and per-entrant, or does it address selling over shared protocols (Finding 3)?
3. Would the narrowed remedy still allow third-party agents to reach Google Ad Manager inventory on non-discriminatory terms?
4. Would it favour access through a protocol Google controls over open, published alternatives?

These questions correspond to the conditions in section 4.5.

5.6 What this paper does not ask

The paper does not ask the Commission to reopen the Inquiry, to impose new remedies on Google, or to act before a remedy exists elsewhere. It does not propose a remedy for AI assistants. Whether the European Commission includes agents in its own remedy is a matter for Brussels; this paper addresses only what happens when the outcome reaches South Africa.

Finding 7. The Commission's existing remedial actions already provide the route by which interoperability with Google's advertising stack will reach South Africa. The request is limited to that route: that the South African version should not exclude AI agents or narrow their access on grounds of market size, on terms neutral as to protocol and inclusive of Google Ad Manager inventory.

6. A working example

This section describes one marketplace built on the mechanism in section 3, to make it concrete. It is Diretsa's account of its own design, drawn from its public website, and contains no performance figures.

6.1 What has been built

Diretsa is a marketplace for advertising on local South African media, including websites, newsletters and screens. Its design maps onto the components in section 3.1:

Component	How Diretsa handles it
Discovery	Each publisher lists its space once, with a rand price, an audience and a format. Listings are published through AdCP so that "any AI buying agent" can find them (Diretsa, 2026a).
Terms and contracting	Publishers set their own prices and ad rules. Bookings are made against those published terms, and Diretsa's own console books through the same AdCP sales agent that outside agents use (Diretsa, 2026b).
Payment and settlement	The budget is held when a booking is approved, before the ad runs. Delivered media is charged at the booked price and any remainder is returned (Diretsa, 2026a).
Proof of delivery	Delivery is counted by Diretsa's ad server, a free screen player, or video and audio (VAST) tags; otherwise the publisher supplies evidence (Diretsa, 2026a).
Dispute resolution	Disputes are decided on the delivery evidence. Delivery reported by the publisher is paid only after a 30-day window in which the advertiser may dispute it (Diretsa, 2026a).
Audience measurement	Publishers state an audience when listing. Diretsa does not provide independent measurement.

6.2 How agents buy

Advertisers can book through a general AI assistant (Claude, ChatGPT or Microsoft Copilot), through their own buying agent, or through the Diretsa console. All three use the same sales agent, built on the AdCP software development kit and offered over the Model Context Protocol. Agents can find inventory, book, change, pause or cancel placements, send artwork and read delivery reports (Diretsa, 2026b). Three design choices bear on the risks in section 4:

- **People stay in control of spending.** Through an AI assistant, a booking requires explicit confirmation in the chat and a one-time code, up to R10,000 per booking. A brand's own agent spends only within limits set on its key.
- **Agents cannot move money.** They cannot top up balances, make payments or change bank details.
- **The same rules apply to agents and people.** Prepaid balances, account limits and ad checks apply whichever route a booking takes (Diretsa, 2026a, 2026b).

6.3 What this shows, and what it does not

It shows that the mechanism in section 3 can be built. Five of the six components of the cost of selling are handled once per listing rather than per buyer, and agents acting from any location can discover, book and verify South African inventory on the same terms. Agentic bookings have been made on the platform, and Diretsa has observed demand from brands headquartered elsewhere in Africa.

It does not show that the mechanism operates at scale, or that it disciplines Google's terms. Diretsa supports one protocol, AdCP; a marketplace built on any other open protocol would serve the argument equally well, and Diretsa's experience says nothing about whether competing protocols will converge. Diretsa has an interest in the outcome this paper argues for, and the Commission should weigh its account accordingly.

About this paper

Author and interest. This paper is published by Diretsa, operated by Aha Core (Pty) Ltd. It was written by Edzai C. Zvobwo, founder of Diretsa. Diretsa operates an advertising marketplace that AI agents can book through an open protocol, and would benefit if the remedies discussed in section 5 were extended to South Africa in the form proposed. The paper has not been commissioned or funded by any other party.

Method. This is a policy analysis. It draws on the non-confidential Final Report of the Media and Digital Platforms Market Inquiry (November 2025) and its Annexure 8; paragraph and clause references are to those documents. It also draws on a scoping search of the literature conducted on 19 November 2026, covering small-market competition theory, remedy design in small economies, digital advertising remedies in other jurisdictions, and AI agents as market participants. About 630 search results were screened and 58 sources included, each confirmed from a publisher, repository or official page. Statements that no published analysis addresses a question are limited to the scope of that search. Where a source was available only as a press report or summary, the text says so. Information about Diretsa is taken from its public website.

Data available to the Commission. Diretsa will make data on bookings made through AI agents, including the countries in which advertisers are headquartered, available to the Commission on a confidential basis. Requests may be sent to support@diretsa.com.

Use of AI tools. This paper was prepared with the assistance of an AI model (Claude, by Anthropic), used to search and summarise literature, check references against primary documents, and draft text. The author reviewed and is responsible for the analysis, the sources and the conclusions.

Status. This paper reflects information available on 19 November 2026. It is not legal advice. Statements about procedure under the Commission's remedial actions represent the author's reading of Annexure 8.

References

AgenticAdvertising.org. (2026). *Ad Context Protocol (AdCP)* (Version 3.2) [Technical standard]. https://adcontextprotocol.org/

Allouah, A., Besbes, O., Figueroa, J. D., Kanoria, Y., & Kumar, A. (2025). *What is your AI agent buying? Evaluation, biases, model dependence, & emerging implications for agentic e-commerce* (arXiv:2508.02630). https://arxiv.org/abs/2508.02630

Athey, S., & Scott Morton, F. (2025). *Artificial intelligence, competition, and welfare* (NBER Working Paper No. 34444). https://www.nber.org/papers/w34444

Australian Competition and Consumer Commission. (2021). *Digital advertising services inquiry: Final report.* https://www.accc.gov.au/system/files/Digital%20advertising%20services%20inquiry%20-%20final%20report.pdf

Autorité de la concurrence. (2026, July 17). *Opinion 26-A-05 on the competitive functioning of the AI agents sector* [Press release]. https://www.autoritedelaconcurrence.fr/en/press-release/ai-agents-autorite-de-la-concurrence-issues-its-opinion-competitive-functioning-ai. Full opinion: https://www.autoritedelaconcurrence.fr/en/opinion/competitive-functioning-artificial-intelligence-ai-agents-sector

Bansal, G., et al. (2025). *Magentic Marketplace: An open-source environment for studying agentic markets* (arXiv:2510.25779). https://arxiv.org/abs/2510.25779

Berry, S., & Waldfogel, J. (2010). Product quality and market size. *Journal of Industrial Economics, 58*(1), 1–31. https://doi.org/10.1111/j.1467-6451.2010.00404.x

Bostoen, F., & Krämer, J. (2025, July). *Is the DMA ready for agentic AI?* CERRE. https://cerre.eu/wp-content/uploads/2025/07/Is-the-DMA-Ready-for-Agentic-AI_Final.pdf

Bresnahan, T. F., & Reiss, P. C. (1991). Entry and competition in concentrated markets. *Journal of Political Economy, 99*(5), 977–1009. https://doi.org/10.1086/261786

Clark, T. (2026, January 6). IAB Tech Lab announces an agentic roadmap, but don't expect any love for AdCP. *The Current.* https://www.thecurrent.com/marketing/data-privacy-iab-tech-lab-ai-agentic-roadmap-adcp

Competition and Markets Authority. (2020). *Online platforms and digital advertising: Market study final report.* https://assets.publishing.service.gov.uk/media/5efc57ed3a6f4023d242ed56/Final_report_1_July_2020_.pdf

Competition Commission South Africa. (2025). *Media and Digital Platforms Market Inquiry: Final report (non-confidential).* https://www.compcom.co.za/wp-content/uploads/2025/11/CC_MDPMI-Final-Report_Non-Confidential-1.pdf

Competition Commission South Africa. (2025). *MDPMI Final report, Annexure 8: Remedial actions (non-confidential).* https://www.compcom.co.za/wp-content/uploads/2025/11/CC_MDPMI-Final-Report_Non-Confidential_Annexure8_Remedial-Actions.pdf

Crémer, J., de Montjoye, Y.-A., & Schweitzer, H. (2019). *Competition policy for the digital era.* Publications Office of the EU. https://doi.org/10.2763/407537

Diretsa. (2026a). *How it works.* Retrieved November 19, 2026, from https://diretsa.com/how-it-works

Diretsa. (2026b). *AI agents.* Retrieved November 19, 2026, from https://diretsa.com/ai-agents

European Commission. (2025, September 5). *Commission fines Google €2.95 billion over abusive practices in online advertising technology* (IP/25/1992; Case AT.40670). https://ec.europa.eu/commission/presscorner/detail/en/ip_25_1992

Ezrachi, A., & Stucke, M. E. (2016). *Virtual competition: The promise and perils of the algorithm-driven economy.* Harvard University Press. https://doi.org/10.4159/9780674973336

Gal, M. S. (2003). *Competition policy for small market economies.* Harvard University Press. https://doi.org/10.4159/9780674037465

Gal, M. S. (2012, November 9). *Merger policy for small and for micro economies* [Conference presentation]. Konkurrensverket. https://integration.konkurrensverket.se/globalassets/dokument/engelska-dokument/knowledge-and-research/the-pros-and-cons/2012_8_michal-ga-merger-policy-for-small-and-micro-jurisdictions.pdf

Gal, M. S., & Elkin-Koren, N. (2017). Algorithmic consumers. *Harvard Journal of Law & Technology, 30*(2), 309–353. https://jolt.law.harvard.edu/assets/articlePDFs/v30/30HarvJLTech309.pdf

Goldfarb, A., & Tucker, C. (2019). Digital economics. *Journal of Economic Literature, 57*(1), 3–43. https://doi.org/10.1257/jel.20171452

Göhsl, J.-F. (2025). Future-proofing the DMA for agentic AI: Lessons from the AI Act. *World Competition, 48*(3), 315–336. https://doi.org/10.54648/woco2025025

IAB Tech Lab. (2025). *Agentic RTB Framework (ARTF) v1.0* [Specification]. https://github.com/IABTechLab/agentic-rtb-framework

Kirkwood, M. (2026, September 18). Can the EU still break up Google? *Tech Policy Press.* https://www.techpolicy.press/can-the-eu-still-break-up-google/

Lancieri, F., & Sakowski, P. M. (2021). Competition in digital markets: A review of expert reports. *Stanford Journal of Law, Business & Finance, 26*, 65.

Markovitz, M. (2025, December 9). A pragmatic win, not a structural fix, in South Africa's deal with big tech. *Tech Policy Press.* https://techpolicy.press/a-pragmatic-win-not-a-structural-fix-in-south-africas-deal-with-big-tech

Montoya, K. (2026, September 20). A deep dive into the antitrust remedies that spared Google's ad tech business. *Tech Policy Press.* https://techpolicy.press/a-deep-dive-into-the-antitrust-remedies-that-spared-googles-ad-tech-business

National Law Review. (2026, September 17). Google keeps AdX as court orders behavioral remedies in ad-tech antitrust case. *The National Law Review.* https://natlawreview.com/article/google-keeps-adx-court-orders-behavioral-remedies-ad-tech-antitrust-case

Paas, K. (2008). Implications of the smallness of an economy for merger remedies. *Juridica International, 15*, 94–103. https://juridicainternational.eu/public/pdf/ji_2008_XV_94.pdf

Roberts, S. (2016). *An agenda for opening up the South African economy: Lessons from studies of barriers to entry.* CCRED, University of Johannesburg.

Robinson, W. T., & Chiang, J. (1996). Are Sutton's predictions robust? Empirical insights into advertising, R&D, and concentration. *Journal of Industrial Economics, 44*(4), 389–408. https://doi.org/10.2307/2950521

Scott Morton, F., Crawford, G., Crémer, J., Dinielli, D., Fletcher, A., Heidhues, P., & Schnitzer, M. (2023). Equitable interoperability: The "super tool" of digital platform governance. *Yale Journal on Regulation, 40*(3), 1013–1055.

Shahidi, P., Rusak, G., Manning, B. S., Fradkin, A., & Horton, J. J. (2025). *The Coasean singularity? Demand, supply, and market design with AI agents* (NBER Working Paper No. 34468). https://doi.org/10.3386/w34468

Sutton, J. (1991). *Sunk costs and market structure: Price competition, advertising, and the evolution of concentration.* MIT Press.