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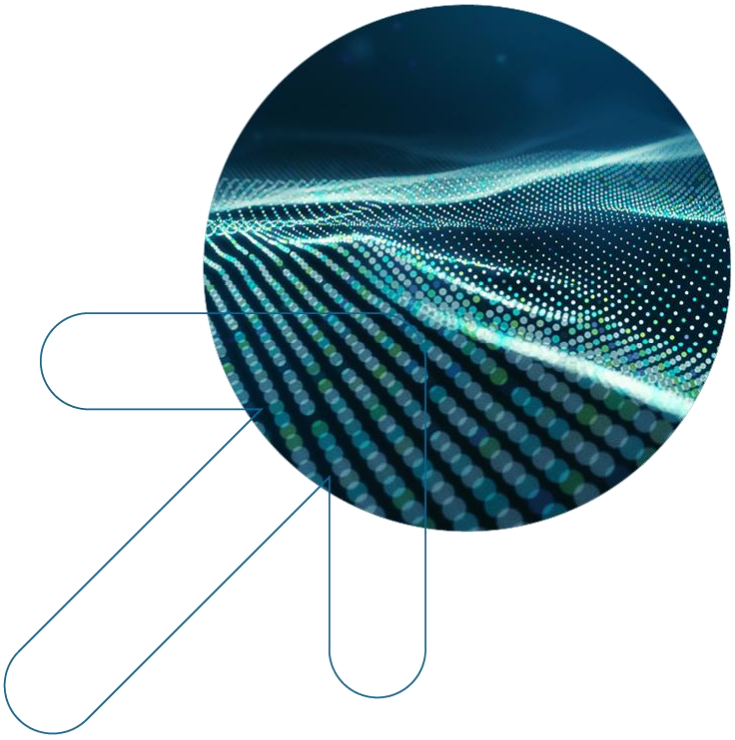

The German Perspective on the power of VLOPs/VLOSEs

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1 Introduction

The Digital Services Act (DSA), enacted in November 2022, establishes a regulatory framework for providers of digital services within the European Union (EU). The primary objective of this legislation is to ensure responsible conduct, user protection, and transparency within the digital ecosystem. A particular focus is placed on Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs), which, due to their significant reach – defined as more than 10% of the EU population, approximately 45 million users – are subject to enhanced regulatory oversight.

Within its transparency requirements, the Digital Services Act (DSA) mandates that Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs) provide clear and accessible information regarding their terms of service, content moderation policies, and advertising practices. Furthermore, the DSA requires these platforms to implement effective complaint-handling mechanisms, enabling users to challenge content removal decisions or other forms of platform intervention in a fair and timely manner. A particular emphasis is placed on user safety, with strengthened protections for minors and enhanced measures to combat illegal content. This includes obligations to mitigate the risks associated with disinformation, harmful content, and online criminal activities, thereby fostering a safer and more accountable digital environment.

As of the present, the European Commission has identified 25 digital services that meet the criteria for a classification as Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs) under the Digital Services Act (DSA). These platforms are subject to enhanced regulatory requirements due to their significant reach and impact on the digital ecosystem.

Among these designated services, 16 are headquartered in the United States, two in China, and one each in South Korea and Canada. Additionally, seven of these platforms are based within the European Union. Notably, 18 of these service providers maintain operational presences in Germany. Table 1-1 below provides a comprehensive overview of these platforms, including their geographic distribution.

The European Commission is responsible for overseeing compliance at the EU level, while national DSCs monitor adherence to the DSA within individual member states. This dual monitoring approach ensures that both EU-wide and country-specific aspects are considered. Given the fragmented nature of monitoring, it is interesting to examine whether the situation in Germany differs fundamentally from the broader European context. It is also of interest to consider whether the VLOPs and VLOSEs mentioned above have any significance at all and whether other, non-designated services are of equal or even greater importance.

The objective of this study is to examine the position of VLOPs and VLOSEs in Germany and to determine whether these services would be classified as such under hypothetical conditions.

Table 1-1: Headquarters and presences of VLOPs and VLOSEs

	Service	Parent Company	Head Quarter City	Head Quarter Country	Presence Europe	Presence Germany
Adult Entertainment	Pornhub	Aylo Freesites Ltd.	Montreal	CAN	CYP	✗
	Stripchat	Technius Ltd.	Limassoul	CYP	CYP	✗
	XVideos	WGCZ Holding, a.s. Republic	Prague	CZE	CZE	✗
	XNXX	NKL Associates s.r.o.	Prague	CZE	CZE	✗
App Stores	Apple App Store	Apple Inc	Cupertino	USA	IRL	✓
	Google Play	Alphabet Inc.	Mountain View	USA	IRL	✓
E-Commerce	AliExpress	Alibaba Group Holding Ltd.	Hangzhou	CHN	NLD	✓
	Amazon Store	Amazon.com Inc	Seattle	USA	LUX	✓
	Google Shopping	Alphabet Inc.	Mountain View	USA	IRL	✓
	Shein	Roadget Business PTE. LTD.	Singapur	SGP	IRL	✗
	Temu	Whaleco Technology Limited	Seoul	KOR	IRL	✗
	Zalando	Zalando SE	Berlin	GER	GER	✓
Travelbooking	Booking.com	Booking Holdings Inc.	Norwalk	USA	NLD	✓
Social Media	Facebook	Meta Platforms Inc.	Menlo Park	USA	IRL	✓
	Instagram	Meta Platforms Inc.	Menlo Park	USA	IRL	✓
	LinkedIn	Microsoft	Redmond	USA	IRL	✓
	Pinterest	Pinterest Inc.	San Francisco	USA	IRL	✓
	Snapchat	Snap Inc.	Santa Monica	USA	GBR	✓
	TikTok	Bytedance Ltd.	Peking	CHN	IRL	✓
	Twitter / X	Twitter / X	San Francisco	USA	IRL	✓
	YouTube	Alphabet Inc.	Mountain View	USA	IRL	✓
Other Services	Google Maps	Alphabet Inc.	Mountain View	USA	IRL	✓
	Wikipedia	Wikimedia Foundation Inc.	San Francisco	USA	NLD	✗
Search	Bing	Microsoft	Redmond	USA	IRL	✓
	Google Search	Alphabet Inc.	Mountain View	USA	IRL	✓

Source: WIK, PLASMA-Database.

This PLASMA Insight is structured as follows. Chapter 2 traces the designation of VLOPs and VLOSEs by the European Commission. The second section analyses and calculates the situation in Germany based on figures reported by the service providers. The analysis will determine whether the services designated as VLOPs and VLOSEs at the EU level would have held the same position in Germany under hypothetical conditions. Chapter 3 examines competition at the service level per segment, considering the competitive situation of VLOPS/VLOSEs in Germany. Chapter 4 identifies and discusses hypothetical VLOPs and VLOSEs in selected segments. Chapter 5 concludes and gives regulatory and policy recommendations.

2 Designation of VLOPs and VLOSEs

2.1 EU Level

In accordance with Article 33 of the DSA, digital platforms or search engines with an average of more than 45 million monthly users within the European Union are designated as Very Large Online Platforms (VLOPs) or Very Large Search Engines (VLOSEs). The designation of VLOPs and VLOSEs is based on the provisions of the DSA which require the publication of information on the average monthly active recipients (AMAR) of a service within the European Union. In particular, Articles 24(2) and 33 are relevant.

On 25 April 2023, the European Commission designated the first 19 such platforms as Very Large Online Platforms (VLOPs), including two app stores, five marketplaces, eight social media services, one online encyclopaedia, one mapping service, and two search engines. This designation affected a total of 13 companies. Subsequent to this, on December 20, 2023, three additional VLOPs from the adult entertainment sector were designated, involving three companies. Thereafter, one e-commerce platform was designated on April 26, 2024, followed by another on May 31, 2024.Furthermore, on June 10, 2024, one more adult entertainment platform was designated. This development brings the total number of designated VLOPs to 25, in addition to two designated Very Large Online Search Engines (VLOSEs).

The DSA requires VLOPs and VLOSEs to publish transparency reports every six months following their designation. This leads to the fact, that the first batch of designated services has already submitted three transparency reports. The following table illustrates the figures that have previously been published by the VLOPs and VLOSEs, meticulously arranged according to the date of publication. The initial figure corresponds to the basis upon which the EU Commission made the designation.

In the context of certain services, a uniform figure is presented that represents users at the EU level. This approach is advantageous in terms of clarity and consistency. However, other companies differentiate between logged-in and logged-out users, which can result in the potential double-counting of individual users in the reported data. This potential discrepancy prompts concerns as it could lead to an overestimation of the total number of users, which exceeds the theoretical maximum defined as the sum of the EU population of 449.2 million in 2024[1] and the number of active enterprises within the EU of 38.2 million in 2023[2]. It is evident that the VLOPs of the Alphabet group (comprising Google services and YouTube), in conjunction with LinkedIn and X/Twitter, demonstrate divergent figures.

1 Eurostat (2025).
2 Eurostat (2024).

In addressing this issue, the approach adopted in this study is to align with the procedural framework established by the EU Commission. For the Alphabet services, initially only the number of logged-in users is shown, treating these figures as a lower bound or minimum value Twitter has been found to report both logged-in and logged-out users, in addition to an aggregated deduplicated figure at European level. For LinkedIn, the Commission has been found to provide both figures. In this instance, it seems appropriate to report the total number and accept double counting where applicable.

Table 2-1: Designation of VLOPs and VLOSEs based on reported user numbers

	VLOP/VLOSE Service	VLOP/VLOSE Company	Date of designation	AMAR at time of designation[3]	AMAR (Million) Reporting H2 2023	AMAR (Million) Reporting H1 2024	AMAR (Million) Reporting H2 2024
Adult Entertainment	**Pornhub**	Aylo Freesites Ltd.	20.12.2023	>45	NA	29	NA
	Stripchat	Technius Ltd.	20.12.2023	>45	NA	16	20
	XVideos	WebGroup Czech Republic	20.12.2023	160	NA	84	31[4]
	XNXX	NKL Associates s.r.o.	10.07.2024	45	NA	NA	NA
App Stores	**Apple App Store**	Apple Distribution International Limited	25.4.2023	123	131	138	139
	Google Play	Google Ireland Ltd.	25.4.2023	284.6	>285	>295	>303
E-Commerce	**AliExpress**	AliExpress International (Netherlands)	25.4.2023	104.3	104	170	149
	Amazon Marketplace	Amazon Services Europe S.à.r.l.l	25.4.2023	181.3	181	200	186
	Google Shopping	Google Ireland Ltd.	25.4.2023	70.8	>70	>57	>31
	Shein	Infinite Styles Services Co. Ltd.	26.04.2024	108	NA	NA	126
	Temu	Whaleco Technology Limited	31.05.2024	75	NA	NA	94
	Zalando	Zalando SE	25.4.2023	74.5	75	76	72
Travelbooking	**Booking.com**	Booking.com B.V.	25.4.2023	>45	>45	>45	>45
Social Media	**Facebook**	Meta Platforms Ireland Limited	25.4.2023	259	259	262	261
	Instagram	Meta Platforms Ireland Limited	25.4.2023	259	259	264	269
	LinkedIn	LinkedIn Ireland Unlimited Company	25.4.2023	177,7[5]	178[6]	226[7]	245[8]
	Pinterest	Pinterest Europe Ltd.	25.4.2023	124	124[9]	73	82
	Snapchat	Snap B.V.	25.4.2023	102	102	91	93
	TikTok	Tik Tok Technology Limited	25.4.2023	135.9	134	142	150
	Twitter / X	Twitter International Unlimited Company	25.4.2023	115.1	115	66	105[10]

3 See European Commission (2025).
4 Without VPN connections.
5 45,2 Mio logged-in and 132,5 Mio logged-out site visits.
6 45,2 Mio logged-in and 132,5 Mio logged-out site visits.
7 47,8 Mio logged-in and 178,2 Mio logged-out site visits.
8 51,8 Mio logged-in and 192,9 Mio logged-out site visits.
9 According to Pinterest, this figure reflects more countries than the member states of the EU. For example, Russia and Turkey are also included.
10 May contain double counting, type of report different from the other dates in the previous reports.

	VLOP/VLOSE Service	VLOP/VLOSE Company	Date of designation	AMAR at time of designation[3]	AMAR (Million) Reporting H2 2023	AMAR (Million) Reporting H1 2024	AMAR (Million) Reporting H2 2024
	YouTube	Google Ireland Ltd	25.4.2023	416.6	>417	>425	>434
Other Services	**Google Maps**	Google Ireland Ltd	25.4.2023	275.6	>276	>282	>288
	Wikipedia	Wikimedia Foundation Inc.	25.4.2023	151.1	151	154	162
Search	**Bing**	Microsoft Ireland Operations Limited	25.4.2023	119	119	116	132
	Google	Google Ireland Ltd	25.4.2023	364	>364	>371	>377

Source: WIK, PLASMA Database.

Following the implementation of the DSA, initial experiences with user number reporting have exposed methodological challenges and strategic considerations.

Four companies initially opted for a more generalised approach, indicating that they had surpassed the 45 million user threshold without providing specific figures. However, they later adjusted their reporting by providing aggregated numbers. A key issue in user reporting is the calculation of the Average Monthly Active Recipients (AMAR) indicator. This metric is not a universally accepted standard for user counts, leading to different interpretations across companies. The lack of a clear, uniform methodology has posed significant challenges in ensuring legal compliance and consistency in reporting.

In addition to methodological difficulties, strategic considerations have played a role in shaping reporting decisions. Companies have carefully weighed the amount of information disclosed, balancing transparency requirements with competitive concerns. This trade-off between regulatory compliance and business interests has influenced the level of detail provided in user number reports. It has also become evident that companies have adapted their reporting approaches over time. For example, in its third report, Twitter no longer provides a deduplicated total count of logged-in and logged-out users. Similarly, some services in the adult entertainment sector have revised their methodologies, now omitting VPN connections from their reported figures.

Article 33(3) of the DSA empowers the EU Commission to adopt delegated acts specifying reporting methods. However, the Commission has not yet exercised this option. Instead, it published a guidance document addressing practical questions raised by companies during implementation. While the guidance clarifies several points, it also emphasises that it does not prejudice future legislation.

The critical question remains: are the explanations provided by the Commission sufficiently concrete? Achieving consistent and horizontally comparable figures across platforms is essential for meaningful transparency and analysis. As the reporting landscape evolves, companies, regulators, and users will continue to navigate these complexities.

In summary, the process of achieving greater transparency in reporting is ongoing. While the DSA's provisions and the Commission's guidance have the potential to foster greater transparency, achieving harmonised reporting practices will necessitate continued efforts and the balancing of openness with the practical considerations involved.

2.2 National Level

In the following, the relationship between users in Germany and users in Europe is analysed in relation to the population. This approach is based on the assumption that if each EU Member State is equally important for a Very Large Online Platform (VLOP) and a Very Large Online Search Engine (VLOSE), the number of users will correspond to population distribution. In a second step, we will define a hypothetical threshold for the German market that corresponds to the DSA approach.

The transparency reports of VLOPs and VLOSEs required under Article 42(3) of the Digital Services Act (DSA) provide valuable insights into the distribution of users across the EU. The DSA requires that the number of users be reported separately for each EU Member State. We have extracted these reported figures for Germany and calculated the corresponding shares. Using the reported data, we can assess how user engagement in Germany compares to its share of the EU population. This analysis provides a better understanding of the relative weight of the German market within the European digital landscape and can be used as a basis for assessing whether platform-specific thresholds should be considered in regulatory discussions.

The figures employed in this study have been derived from the respective available transparency reports. It should be noted that data for XNXX is not currently available, despite its designation in June 2024. Booking.com does not provide figures at the Member State level, and for services that differentiate between logged-in and logged-out users, the previously outlined approach has been followed. The data of the Alphabet services, LinkedIn and X/Twitter is addressed. However, it should be noted that direct comparisons between these figures and the total AMAR reported at the EU level (as shown inTable 2-1) may be inconsistent, due to the fact that VLOPs and VLOSEs frequently report separate figures for registered and unregistered users, which can lead to potential overlap. It is therefore assumed that the reported figures have been adjusted accordingly to account for such discrepancies. It is important to emphasise that companies are required to report AMAR at the Member State level. However, in some cases, these figures reflect Monthly Active Users (MAU) or, in a less specific manner, general user counts. In this analysis, all figures are categorised as AMAR in accordance with the requirements of the Digital Services Act (DSA).

Table 2-2: German share of European AMAR numbers

	Transparency Report H2 2023			Transparency Report H1 2024			Transparency Report H2 2024		
Service	AMAR GER Total in Million	AMAR EU Total in Million[11]	AMAR GER/ AMAR EU in %	AMAR GER Total in Million	AMAR EU Total in Million[12]	AMAR GER/ AMAR EU in %	AMAR GER Total in Million	AMAR EU Total in Million[13]	AMAR GER/ AMAR EU in %
Pornhub	NA	NA	NA	5.4	29.4	18.5%	NA	NA	NA
Stripchat	NA	NA	NA	3.2	16.1	20.0%	5.7	20.0	28.4%
XVideos	NA	NA	NA	5.5	84.6	6.5%	2.3	31.1	7.4%
XNXX	NA	NA	NA	NA	NA	NA	NA	NA	NA
Apple App Store	28.0	131.0	21.4%	30.0	138.0	21.7%	30.0	139.0	21.6%
Google Play	54.5	284.5	19.2%	57.4	290.5	19.8%	59.6	298.5	20.0%
AliExpress	11.0	104.4	10.5%	18.0	172.7	10.4%	18.6	151.3	12.3%
Amazon Marketplace	60.4	181.4	33.3%	63.3	199.9	31.7%	54.7	186.1	29.4%
Google Shopping	15.4	73.4	21.0%	12.4	57.5	21.6%	5.0	31.6	15.8%
Shein	NA	NA	NA	NA	NA	NA	17.8	128.1	13.9%
Temu	NA	NA	NA	NA	NA	NA	16.3	93.7	20.0%
Zalando[14]	NA	74.5	NA	NA	76.0	NA	15.6	72.0	21.7%
Book-ing.com	NA	>45.0	NA	NA	>45.0	NA	NA	>45.0	NA
Facebook	33.2	259.5	12.8%	33.2	262.0	12.7%	32.9	260.6	12.6%
Instagram	42.5	260.3	16.3%	44.0	265.6	16.6%	45.0	269.4	16.7%
LinkedIn	32.0	178.0	18.0%	38.8	226.0	17.2%	40.6	244.6	16.6%
Pinterest	NA	NA	NA	14.7	85.0	17.3%	15.3	87.7	17.4%
Snapchat	21.1	102.0	20.7%	17.7	90.9	19.5%	19.2	92.9	20.7%
TikTok	20.9	135.9	15.4%	21.7	142.6	15.2%	22.8	150.5	15.1%
Twitter / X	16.3	126.1	13.0%	15.7	109.2	14.4%	17.0	105.3	16.1%
YouTube	82.1	445.8	18.4%	84.7	460	18.4%	88.1	465.8	18.9%
Google Maps	54.7	305.2	17.9%	56.7	321.2	17.7%	56.5	308.4	18.3%
Wikipedia	34.5	144.3	23.9%	34.8	150.4	23.1%	36.7	159.5	23.0%
Bing	27.3	120.8	22.6%	27.0	118.5	22.8%	29.5	80.4	36.7%
Google Search	62.8	363.4	17.3%	64.6	371.6	17.4%	66.6	377.5	17.6%

Source: WIK, PLASMA Database.

Germany's population was 83.4 million in 2024, representing approximately 19% of the total EU population of 449.21 million.[15] Assuming that the distribution of user numbers within the EU mirrors the distribution of its population, the ratio of AMAR in Germany to AMAR in the EU would also be 19%. Consequently, if a corresponding ratio were to

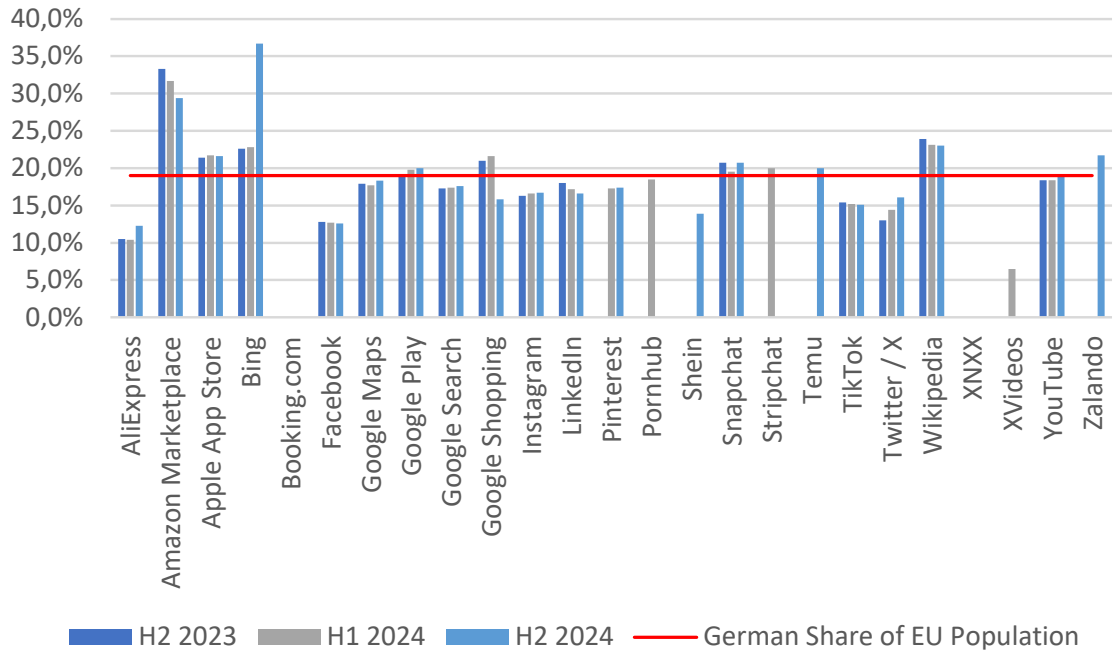
11 The total of the Member States reporting is presented here. This figure may differ from that reported for the designation.
12 The total of the Member States reporting is presented here. This figure may differ from that reported for the designation.
13 The total of the Member States reporting is presented here. This figure may differ from that reported for the designation.
14 The reporting for the AMAR number of retail service and platform services is presented here.
15 Eurostat (2025).

emerge for an individual service across all member states, no market would have a particularly high or low relevance for this service. This is represented by the horizontal 19% line in the graph below. For all VLOPs and VLOSEs above this line, the German market has a relatively higher relevance, while below this line, it has a relatively lower relevance.

As demonstrated in Figure 2-1, the German market holds considerable significance for all the displayed VLOPs/VLOSEs. During the second half of 2023, 16 VLOPs were reported, while 20 services were documented in both the first and second halves of 2024. The number of VLOPs/VLOSEs above the 19% line in H2 2023 and H1 2024 is 7 out of 16 and 7 out of 20, respectively, and 8 out of 20 in H2 2024. Between 1 and 3 services are just below the line, and half of them are clearly below the 19% line.

The German market appears to be of particular importance for the VLOPs/VLOSEs Amazon Marketplace, Apple App Store, Bing and Wikipedia, as they are all clearly above the 19% line. By contrast, AliExpress, Facebook and XVideos are all significantly lower. Bing has recently seen significant growth, while Google Shopping has seen a decline.

Figure 2-1: German Share of European AMAR Numbers in relation to population



Source: WIK, PLASMA Database.

The DSA sets a threshold of 45 million users, which corresponds to 10% of the EU population of 449.2 million (rounded to the nearest million). In the following the question should be posed, whether all VLOPs and VLOSEs that have been designated by the European Commission would also have been designated in Germany. Therefore, we will define a hypothetical threshold for the German market that corresponds to the DSA approach.

A share of 10% of the German population, rounded to the nearest million, would have to be applied. Based on the year 2024, when the population of Germany is estimated to be around 83.4 million, the hypothetical threshold would be 8 million.

An analysis of the absolute figures in Table 2-2 shows that all VLOPs and VLOSEs operating in the German market, with the exception of adult entertainment services, are well above the hypothetical threshold of 8 million users. This means that they would have been hypothetically designated in Germany. For some services, the number of users in Germany is already above the European threshold, i.e. they already have more than 45 million users in Germany.

It could be argued that these figures are somewhat overestimated for individual services, as registered and unregistered users are sometimes combined, and duplicates are not taken into account. Despite the application of discounts, it is likely that the figures will exceed the limit. In the context of adult entertainment, falling below the threshold should be treated with caution. The omission of VPN connections from the user data is also problematic.

With all due caution and qualification, it can be stated at this point that the VLOPs and VLOSes identified by the European Commission with its AMAR figures are well above the defined hypothetical threshold for Germany.

3 User Perspective in Germany

3.1 Relevant VLOP/VLOSE segments

This section provides a more detailed examination of the situation in Germany, specifically analysing the competitive landscape within the individual VLOP/VLOSE segments. The assessment aims to determine whether there are services available in the German market that pose significant competition to the designated VLOPs and VLOSEs. Additionally, it will explore whether other services could be eligible for designation if only the German market were considered.

The PLASMA database contains information on various segments. In selecting services within a segment, the goal was to provide a representative market overview from the end user's perspective. This includes both large, well-known services and smaller, lesser-known, and newer offerings within a segment category (long tail). It is important to note that while the selection of services suggests an economically relevant market, this was not explicitly tested (e.g., SSNIP test). This approach aligns with current regulatory frameworks such as the Digital Markets Act (DMA). Business areas in the digital economy are categorized thematically or functionally, without being explicitly defined as independent markets. The segment of the PLASMA database that offers services is not considered a separate and economically significant market and may not fully align with the definitions used by the European Commission.

The selection of services within a given segment typically includes large international offerings that are globally available (such as VLOPs and VLOSEs), as well as smaller niche applications that are less well-known, particularly in Germany. To be included in one of the five previously identified segments, a service must be B2C-oriented and available to end customers in Germany.

The following table provides an overview of the segments identified for further analysis. For Wikipedia and Google Maps no separate segments have been created, which precludes a detailed analysis at the segment level.

Table 3-1: Relevant PLASMA segments for the designated VLOPs and VLOSEs

Service	PLASMA Segment
AliExpress	E-Commerce
Amazon Marketplace	E-Commerce
Apple App Store	App Stores
Bing	Search Engines
Booking.com	Travel Booking
Facebook	Social Networks
Google Maps	Others
Google Play	App Stores
Google Search	Search Engines
Google Shopping	Price Comparisons
Instagram	Social Networks

Service	PLASMA Segment
LinkedIn	Social Networks
Pinterest	Social Networks
Pornhub	Adult Entertainment
Shein	E-Commerce
Snapchat	Social Networks
Stripchat	Adult Entertainment
Temu	E-Commerce
TikTok	Social Networks
Twitter / X	Social Networks
Wikipedia	Others
XNXX	Adult Entertainment
XVideos	Adult Entertainment
YouTube	Streaming Video
Zalando	E-Commerce

Source: WIK, Own calculation, based on the transparency reports.

The PLASMA database assigns the remaining 25 VLOPs to eight segments, which are analysed in more detail below.

- Adult Entertainment
- App Stores
- E-Commerce
- Price Comparisons
- Search Engines
- Social Networks
- Streaming Video
- Travelbooking

3.2 Sector specific analysis

The following provides the foundation for further analysis of the segment and its services, using user figures as a key metric. For this purpose, the indicators Monthly Active Users (MAU) or Monthly Unique Visitors (MUV) are applied consistently throughout the chapter. These indicators are included in the database for all segments at the service level in Germany.

The MAU Monthly active users variable describes the number of unique users who have actively used the service within a month and are not duplicated across multiple devices. The variable MUV Monthly Unique Visitors is the average number of individuals visiting an analysed domain or app is the same and only counts the unique visitors.

It is important to note that the MAU or MUV indicators differ from the AMAR indicator used in Chapter 3. In most cases, the absolute values reported for AMAR are likely to be higher than those for MAU.[16]

3.2.1 Adult Entertainment

The database contains data on 10 services from 8 companies in the adult entertainment segment. This includes four designated VLOPs: Pornhub, Stripchat, XNXX, and XVideos. Six of these services are headquartered in the EU, including three in Cyprus, while two are based in Canada, one in the UK, and one in the USA.

16 For this discussion also see Liebe/Wiewiorra (2023).

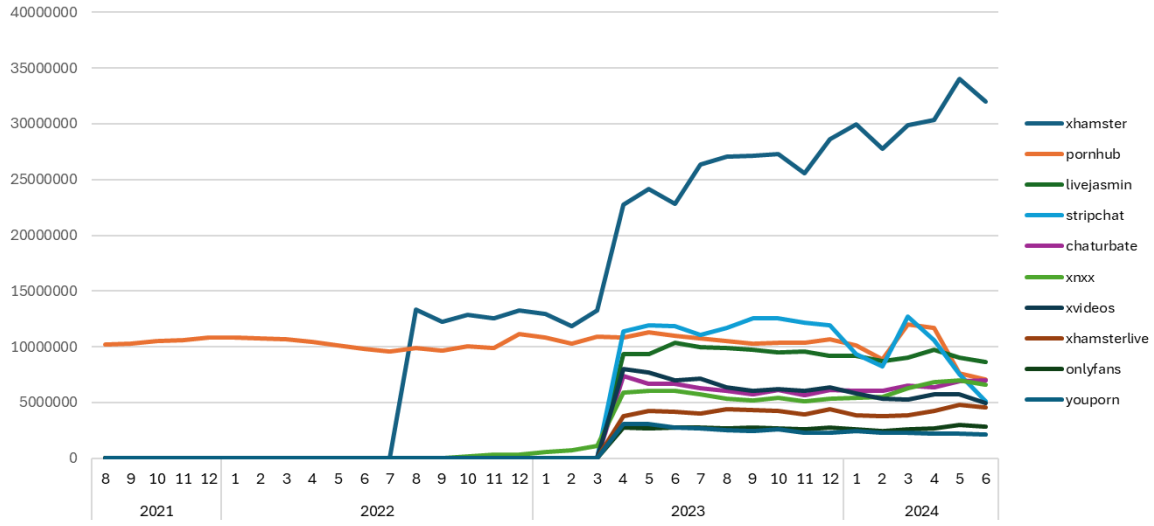
Table 3-2: Adult Entertainment: Segment overview

Service	Company	Headquarter
chaturbate	Multi Media LLC	Lake Forest, USA
livejasmin	JWS Americas S.A.r.l.	Luxembourg, Luxembourg
onlyfans	Fenix International Limited	London, UK
pornhub	AYLO FREESITES LTD	Montreal, Canada
stripchat	Technius Ltd.	Limassol, Cyprus
xhamster	Hammy Media Ltd	Limassol, Cyprus
xhamsterlive	Technius Ltd.	Limassol, Cyprus
xnxx	NKL Associates s.r.o	Prague, Czechia
xvideos	WGCZ Holding, a.s.	Prague, Czechia
youporn	AYLO FREESITES LTD	Montreal, Canada

Source: WIK, PLASMA Database.

In terms of user numbers, the segment has shown significant dynamics in Germany, particularly in recent months. xHamster holds a prominent position and appears to be experiencing steady growth. The designated VLOPs play a relatively minor role. Pornhub, as the strongest VLOP in terms of user numbers, appears to have experienced a significant decline, especially in 2024.

Figure 3-1: Adult Entertainment: Development of user numbers (App (MAU) and Web (MUV) 08/2021-06/2024)



Source: WIK, PLASMA Database.

xHamster ranks first with 32 million users, followed by LiveJasmin with 8.6 million and Pornhub with 7 million users. xHamster and LiveJasmin are well above the 8-million threshold in Germany, whereas all designated VLOPs fall below it. If the threshold were lowered to 4 million, six additional services would qualify. Only two services, OnlyFans and YouPorn, would not be candidates for a VLOP-like status in Germany.

3.2.2 App Stores

The database provides data for 16 services from 16 companies in the app store segment. The Google Play Store and the Apple App Store were designated as VLOPs. None of the companies is based in Germany, and only three are based in the EU. Six companies are headquartered in the USA, while seven are based in China, South Korea, and Japan.

Table 3-3: App Stores: Segment overview

Service	Company	Headquarter
Alt Store	AltStore LLC	Los Angeles, USA
Amazon Appstore	Amazon.com Inc.	Seattle, USA
APKMirror	Illogical Robot LLC	Newark, USA
Apple App Store	Apple Inc.	Cupertino, USA
Aptoide	Aptoide, S.A.	Lisbon, Portugal
Google Play Store	Alphabet Inc.	Mountain View, USA
Huawei AppGallery	Huawei Technologies Co., Ltd.	Shenzhen, China
LG SmartWorld	LG Electronics Inc.	Seoul, South Korea
Microsoft Store	Microsoft	Redmond, USA
Oppo App Market	Guangdong Oujia Holdings Co., Ltd.	Dongguan, China
Samsung Galaxy Store	Samsung Group	Seoul, South Korea
softonic	Softonic International SA	Barcelona, Spain
Sony Apps	SONY Group Corporation	Tokio, Japan
Uptodown	Uptodown Technologies SL	Malaga, Spain
Vivo App Store	Vivo Mobile Communications Co., Ltd.	Dongguan, China
Xiaomi App Store	Xiaomi Inc.	Peking, China

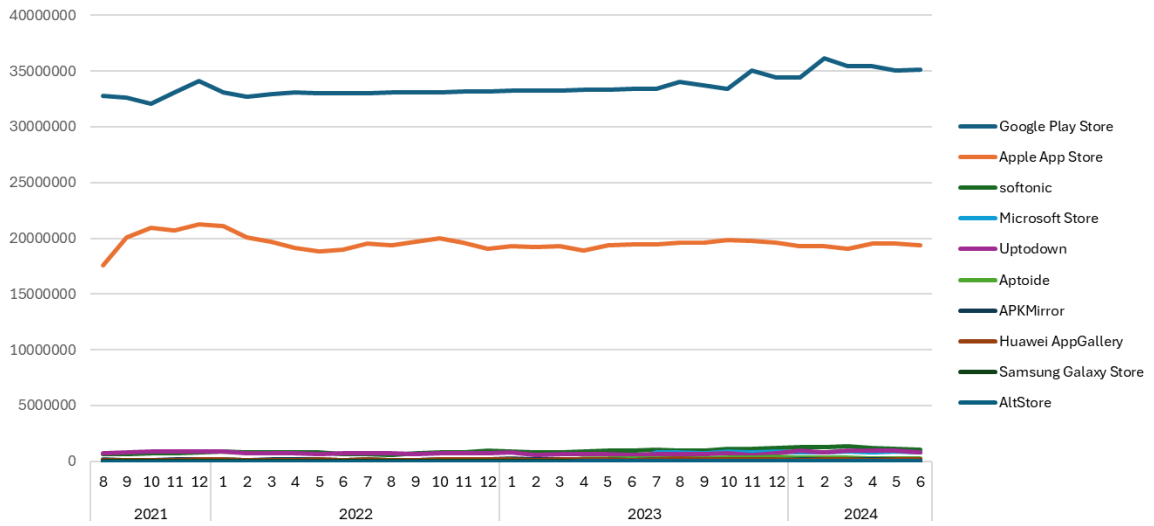
Source: WIK, PLASMA Database.

App stores are usually accessed through apps and are rarely, if ever, used via the web. Unfortunately, the PLASMA database does not have user figures for all the services it contains. In addition to the two major app stores from Apple and Alphabet, data is available for eight other alternative app stores. Six services are missing.

As shown in Figure 3-2, the development of app stores over time is relatively stable, and the ranking in terms of user numbers is clear. The Google Play Store has round about 35 million users, making it the most popular app store, followed by the Apple App Store with 19.3 million users.

This places both app stores well above the hypothetical threshold of 8 million users in Germany. No other service is a hypothetical VLOP candidate in Germany. Softonic, in third place, has only round about 1 million users, followed by Microsoft Store and Uptodown with each 0.7 million users.

Figure 3-2: App Stores: Development of user numbers (App (MAU) and Web (MUV) 08/2021-06/2024)



Source: WIK, PLASMA Database.

The topic of alternative app stores has become increasingly pertinent in the context of the Digital Markets Act (DMA). The DMA is designed to guarantee that digital markets in which gatekeepers (i.e. companies that control market access for others due to their market power and network effects) are active remain contestable. Consequently, Apple and Google have been obliged to permit third-party app stores on their devices or to facilitate access to them. It will be of interest to observe the future development of third-party providers, namely alternative app stores, and the segment in question. In the current figures it is not really reflected.

3.2.3 E-Commerce

The PLASMA database currently lists 23 services in the e-commerce segment that are of particular interest to consumers. The table below shows the company behind each service and its headquarters. Five of these services have been designated as VLOP by the EU Commission. Nine of the companies are headquartered in Germany, six in the USA, three in other EU countries, four in China, and one in the United Kingdom.

Table 3-4: E-Commerce: Segment overview

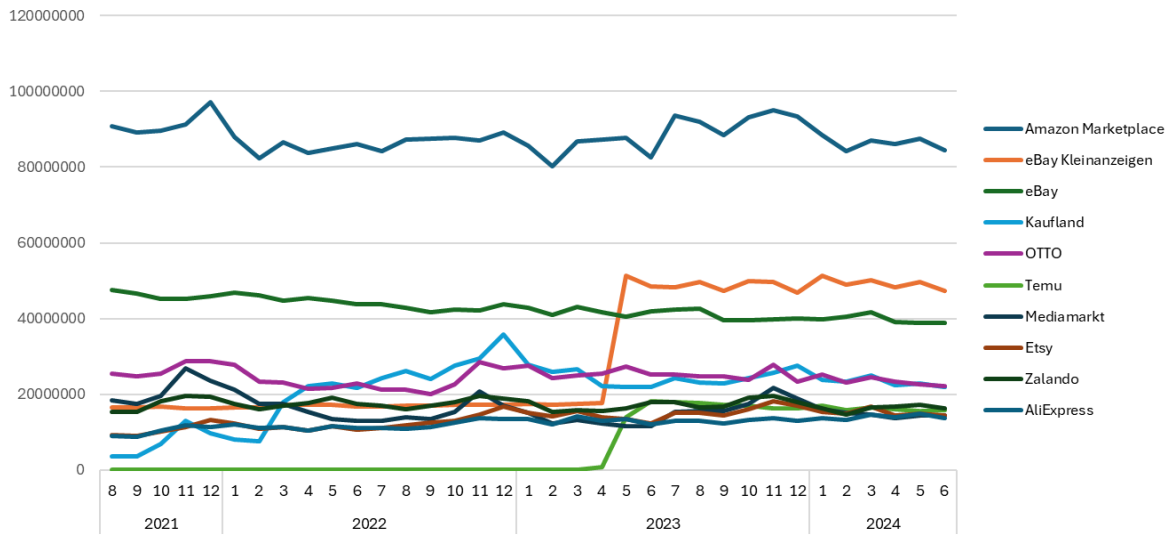
Service	Company	Headquarter
About You	Otto GmbH& CO KG	Hamburg, Germany
AliExpress	Alibaba	Hangzhou, China
Amazon Marketplace	Amazon.com Inc.	Seattle, USA
Avocadostore	Avocado Store GmbH	Hamburg, Germany
Conrad	Conrad Holding SE	Hirschau, Germany
eBay	eBay Inc.	San Jose, USA
eBay Kleinanzeigen	Adevinta ASA	Oslo, Norway
Etsy	Etsy Inc.	New York City, USA
Facebook Marketplace	Meta Platforms Inc.	Menlo Park, USA

Service	Company	Headquarter
Fruugo	Fruugo.com Ltd.	Ulverston, UK
Hood	Signa Holding GmbH	Innsbruck, Germany
Kaufland	Schwarz Unternehmenskommunikation GmbH & Co. KG	Neckarsulm, Germany
Mediamarkt	Ceconomy AG	Düsseldorf, Germany
OTTO	Otto GmbH & CO KG	Hamburg, Germany
Shein	ROADGET BUSINESS PTE. LTD.	Singapur, Singapur
Temu	Whaleco Technology Limited	Beijing, China
Trendyol	Alibaba Group Holding Ltd.	Hangzhou, China
vidaXL	vidaXL marketplace Europe B.V.	Venlo, Netherlands
Vinted	Vinted Ltd.	Vilnius, Lithuania
Wayfair	Wayfair Inc.	Boston, USA
Wish	Contextlogic Inc.	San Francisco, USA
Yatego	Kammerer Media Holding GmbH	Berlin, Germany
Zalando	Zalando SE	Berlin, Germany

Source: WIK, PLASMA Database.

The e-commerce segment exhibits relatively stable user figures over time, apart from ebay Kleinanzeigen in 2023, which has undergone significant changes in its position.

Figure 3-3: E-Commerce: Development of user numbers (App (MAU) and Web (MUV) 08/2021-06/2024)



Source: WIK, PLASMA Database.

Amazon Marketplace is ranked first, followed by eBay Kleinanzeigen, eBay, OTTO and Kaufland. Four VLOPs, Amazon Marketplace, AliExpress, Zalando, Shein, and Temu, are in the top 10. However, the fifth one, Shein, does not play such an important role in Germany. This also means that while these five exceed the hypothetical threshold, Shein, with 7.4 million users, falls just below it.

It is interesting to note that AliExpress, Temu, and Shein have experienced significant growth over the past two years, albeit to varying degrees. For example, Temu only surpassed the 4-million-user mark in March 2023 and exceeded 8 million users by May 2023.

3.2.4 Price Comparisons

The PLASMA database includes 11 price comparison services, among them the VLOP Google Shopping for which data has only been available since second half of 2023. Eight of these services are headquartered in Germany, while Google Shopping is based in the USA, Bestdeals.today in Israel, and Geizhals.de in Austria.

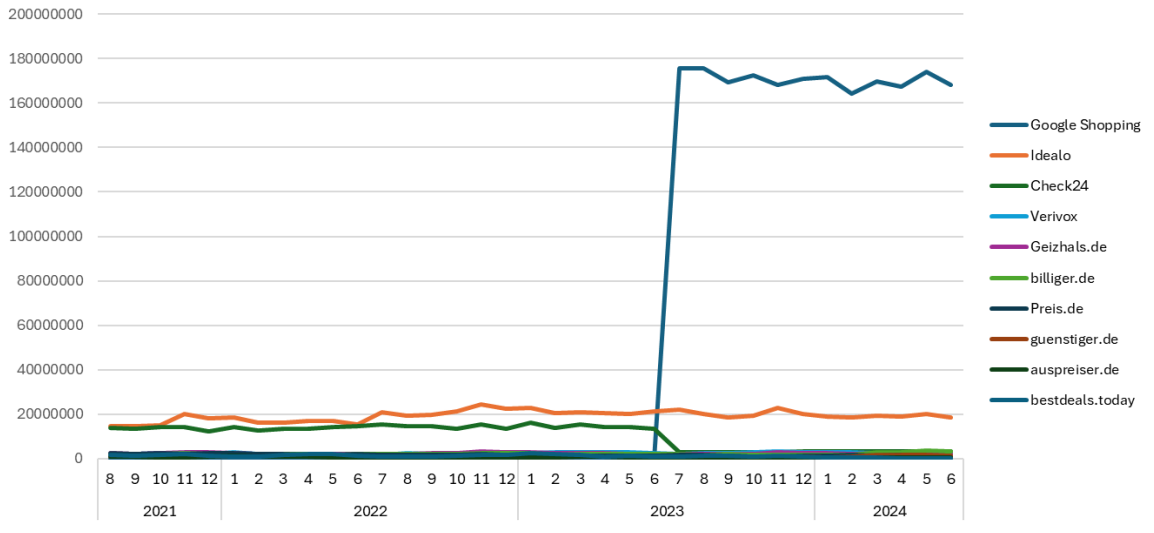
Table 3-5: Price Comparisons: Segment overview

Service	Company	Headquarter
auspreiser.de	Axel Springer SE	Berlin, Germany
bestdeals.today	Roundforest Ltd	Ramat Gan, Israel
billiger.de	solute holding GmbH & Co. KG	Frankfurt Main, Germany
Check24	CHECK24 GmbH	Munich, Germany
Geizhals.de	Preisvergleich Internet Services AG	Wien, Austria
Google Shopping	Alphabet Inc.	Mountain View, USA
guenstiger.de	New Media Beteiligung GmbH	Hannover, Germany
Idealo	Axel Springer SE	Berlin, Germany
Preis.de	Axel Springer SE	Berlin, Germany
Preisvergleich.de	get AG	Leipzig, Germany
Verivox	Verivox Holding GmbH	Heidelberg, Germany

Source: WIK, PLASMA Database.

Google Shopping plays a dominant role in the price comparison segment. German services such as Idealo, Check24, and Verivox follow. The curves for these services remain relatively flat and clearly below the 20-million mark. A notable decline in the number of users on Check24 was observed in June 2023, shortly after Google Shopping was designated as a VLOP. This decline could be indicative of a fundamental shift in market dynamics or a change in the underlying data.

Figure 3-4: Price Comparisons: Development of user numbers (App (MAU) and Web (MUV) 08/2021-06/2024)



Source: WIK, PLASMA Database.

Google Shopping and Idealo have user numbers of 168 million and 18 million, respectively, both significantly exceeding the hypothetical threshold of 8 million. According to this criterion, both platforms qualify as potential VLOP candidates. It is noteworthy that no other services operating within the price comparison segment have attained this level of popularity.

3.2.5 Search Engines

The PLASMA database for the segment of search engines comprises 15 services, listed in the following table along with their respective parent companies and headquarters. Google Search and Bing and the two designated VLOSES. The data shows that the majority of companies (40%) are headquartered in the USA. Only two of the listed services, Ecosia and MetaGer, are operated by companies based in Germany.

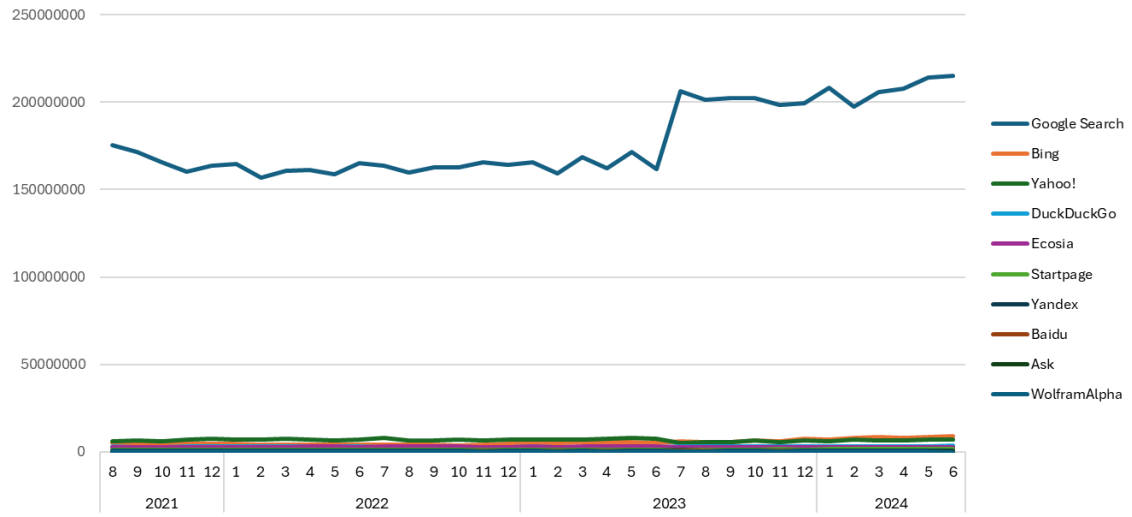
Table 3-6: Search Engines: Segment overview

Service	Company	Headquarter
Ask	IAC Inc.	New York City, USA
Baidu	Baidu Inc	Peking, China
Bing	Microsoft	Redmond, USA
Disconnect Search	Disconnect Inc.	San Francisco, USA
DuckDuckGo	Duck Duck Go Inc.	Paoli, USA
Ecosia	Ecosia GmbH	Berlin, Germany
Google Search	Alphabet Inc.	Mountain View, USA
MetaGer	SuMa e.V.	Hannover, Germany
Qwant	Qwant SAS	Paris, France
Search Encrypt	Polarity Technologies Ltd	Nicosia, Cyprus
Startpage	Surfboard Holding BV	Utrecht, Netherlands
Swisscows	Hulbee AG	Egnach, Switzerland
WolframAlpha	WolframAlpha LLC	Oxfordshire, UK
Yahoo!	Yahoo Inc.	Dulles, USA
Yandex	Yandex N.V.	Moscow, Russia

Source: WIK, PLASMA Database.

Figure 3-5 illustrates the user numbers of the top ten search engines over time. During the period under review, Google consistently outperforms the other services with significantly higher user numbers.

Figure 3-5: Search: Development of user numbers (App (MAU) and Web (MUV) 08/2021-06/2024)



Source: WIK, PLASMA Database.

It is important to assess whether the user numbers presented here are sufficient to identify the known VLOPs/VLOSEs and potential additional candidates. The threshold value, which was derived and discussed in Chapter 2.2, will be applied. This value is set at 10% of the population in Germany, equivalent to 8 million users. Among the search engines, only Google Search exceeds this threshold, with approximately 215 million users in 2024. Google is followed by Bing with 8.7 million users, Yahoo with around 7 million, DuckDuckGo with 3.4 million, and Ecosia with just under 3 million. Based on these figures, Google Search and Bing would initially qualify as VLOSEs.

However, if we assume that the AMAR (Average Monthly Active Reach) indicator generally surpasses the MAU (Monthly Active Users) indicator, the threshold would need to be slightly adjusted downward. Should the threshold be halved to 5% of the population, or 4 million users, Yahoo would then meet the criteria. It is unlikely that any other search engines in the German market would qualify as VLOSEs. However, niche candidates with growth potential could still be identified.

3.2.6 Social Networks

The PLASMA database comprises 20 services in the social networks segment, as detailed in the table below. Seven of these services are previously designated as VLOPs.

Six of the companies are not headquartered in the USA. Two of the services, Yodel and XING, are operated from Germany, while Tiktok is based in China, Azar in South Korea, BeReal in France and VK in Russia. All other services are headquartered in the USA.

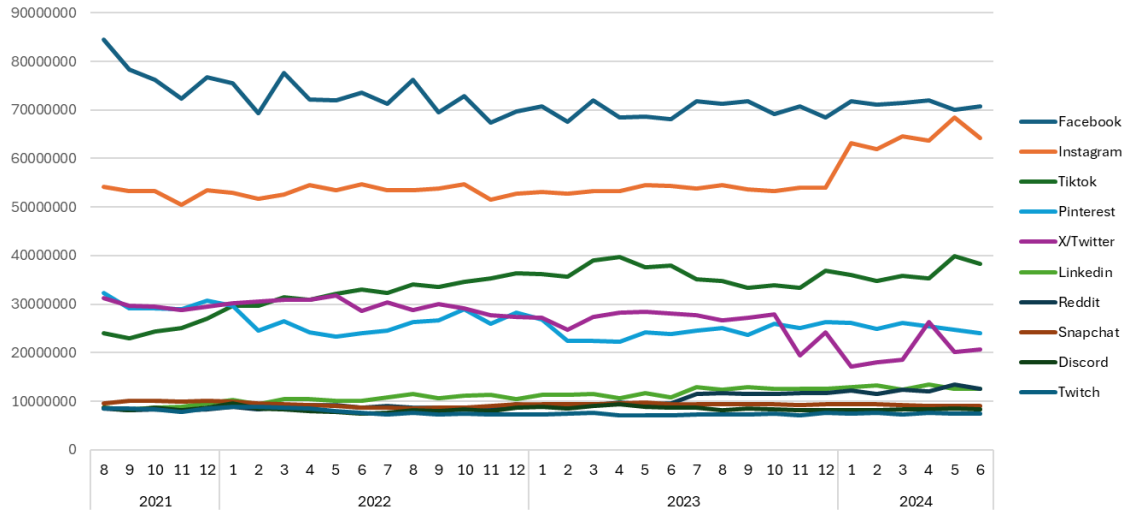
Table 3-7: Social Networks: Segment overview

Service	Company	Headquarter
Azar	Hyperconnect LLC.	Seoul, South Korea
BeReal	BeReal	Paris, France
Clubhouse	Alpha Exploration Co.	San Francisco, USA
Discord	Discord Inc.	San Francisco, USA
Facebook	Meta Platforms Inc.	Menlo Park, USA
Flickr	SmugMug Inc.	Mountain View, USA
Instagram	Meta Platforms Inc.	Menlo Park, USA
Jodel	Jodel Venture GmbH	Berlin, Germany
Linkedin	Microsoft	Redmond, USA
Mastodon	Mastodon gGmbH	Berlin, Germany
Pinterest	Pinterest Inc.	San Francisco, USA
Reddit	Reddit Inc.	San Francisco, USA
Snapchat	Snap Inc.	Santa Monica, USA
Threads	Meta Platforms Inc.	Menlo Park, USA
Tiktok	ByteDance Ltd.	Beijing, China
Tumblr	Automattic Inc.	San Francisco, USA
Twitch	Amazon.com Inc.	Seattle, USA
VK	VK LLC	Moscow, Russia
X/Twitter	Twitter Inc.	San Francisco, USA
XING	New Work SE	Hamburg, Germany

Source: WIK, PLASMA Database

The user data indicates that the social media platforms under consideration have experienced relatively stable growth over time, with only slight fluctuations. Noteworthy is the growth of Instagram in 2024, as well as the significant increase in user numbers for TikTok over the period under review.

Figure 3-6: Social networks: Development of user numbers (App (MAU) and Web (MUV) 08/2021-06/2024)



Source: WIK, PLASMA Database.

In the period under review, 01-06/2024, 9 services, and thus 45% of the services listed in the database, were above the hypothetical threshold of 8 million users in Germany. The services include Facebook, Instagram, TikTok, Pinterest, X/Twitter, LinkedIn, Reddit, Snapchat and Discord. With a threshold of 4 million users, a further two services would be added, namely Twitch and Xing.

This means that the services designated at EU level are also considered VLOPs in Germany and the list would have to be extended to include Reddit and Discord. Twitch and Xing are further candidates.

3.2.7 Streaming Video

The video streaming segment has the highest number of services included in the PLASMA database, with 36 services listed in the table below. Of these, 20 are operated by companies headquartered in the USA, while 12 originate from the EU, including eight based in Germany. Four additional services are based in Japan, the UK, and Switzerland. Among them, YouTube is the only service in this segment designated as a VLOP.

Table 3-8: Streaming Video: Segment overview

Service	Company	Headquarter
Amazon Prime Vi-	Amazon.com Inc.	Seattle, USA
Apple TV+	Apple Inc.	Cupertino,
ARD Mediathek	Arbeitsgemeinschaft der öffentlich-rechtlichen Rundfunkanstalten der Bundesrepublik Deutschland	München, Germany
Chili	Chili SpA	Mailand,
Crunchyroll	Crunchyroll, LLC/Ellation, LLC.	Tokyo, Ja-
Dailymotion	Vivendi SE	Paris,
DAZN	Access Industries Inc.	New York
Disney+	The Walt Disney Company	Burbank,
Eurosport Player	Discovery Inc.	Silver
Giga TV	Vodafone Group Plc	Newbury,
Google Play Store	Alphabet Inc.	Mountain
HBO maxx	Warner Media LLC	New York
Hulu	The Walt Disney Company	Burbank,
Joyn	Joyn GmbH	Munich,
Magenta TV	Deutsche Telekom AG	Bonn, Ger-
Microsoft Store	Microsoft	Redmond,
Netflix	Netflix Inc.	Los Gatos,
Pantaflix	PANTAFLIX AG	Munich,
Peacock	NBCUniversal Media LLC	New York
Prosieben	ProSiebenSat.1 Media SE	Unter-
Rakuten TV	Rakuten Group Inc.	Tokio, Japan
RTL Plus	RTL Group S.A.	Luxem-
Sky Go	Comcast Corporation	Philadel-
Sky Sports	Comcast Corporation	Philadel-
Sky Store	Comcast Corporation	Philadel-
Sky Ticket	Comcast Corporation	Philadel-
TV Now	RTL Group S.A.	Luxem-
Vevo	Vevo LLC	New York

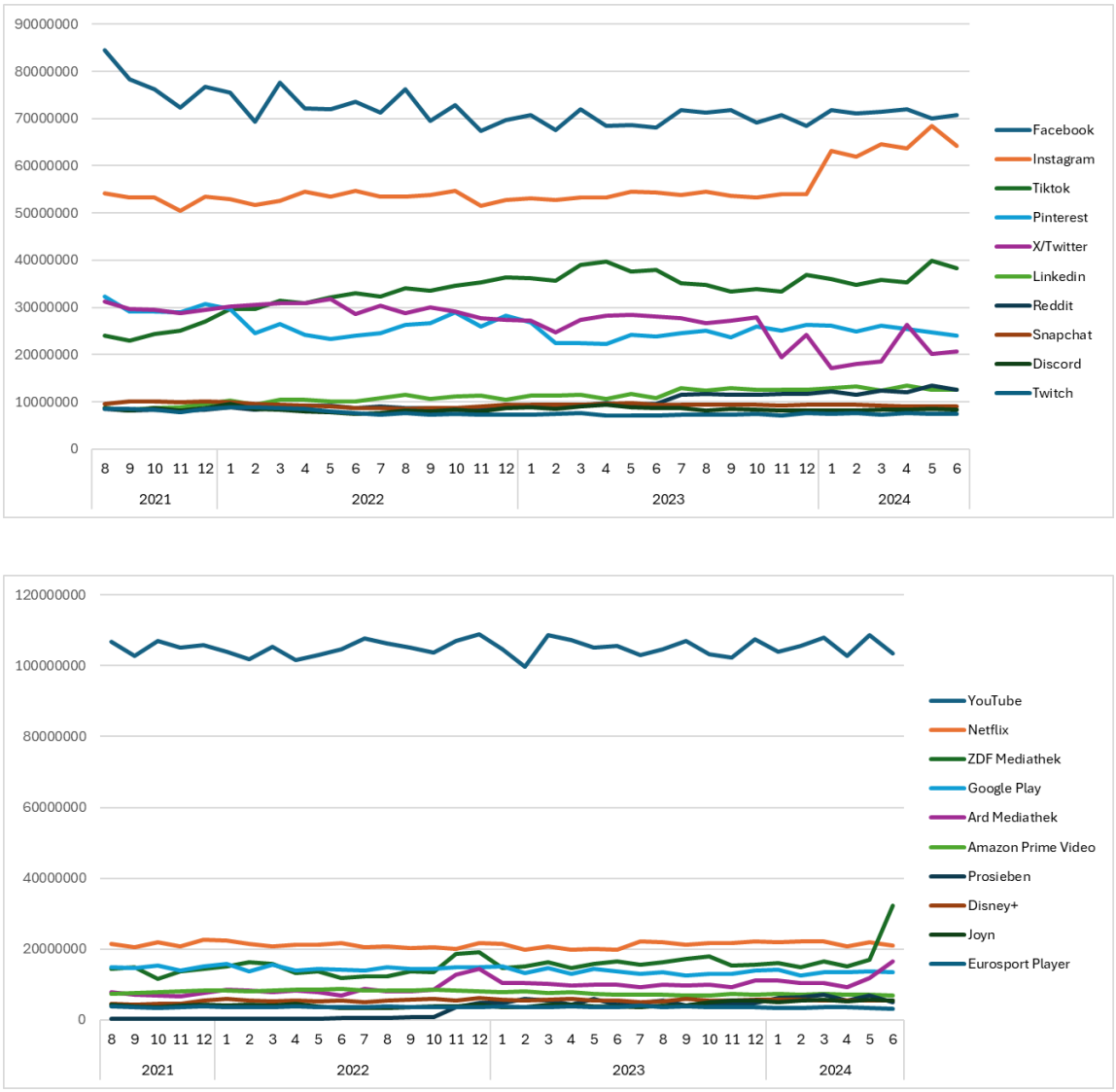
Service	Company	Headquarter
Videoload	Deutsche Telekom AG	Bonn, Ger-
Vimeo	Vimeo Inc.	New York
Waipu	Exaring AG	München,
WOW	Comcast Corporation	Philadel-
YouTube	Alphabet Inc.	Mountain
YouTube Kids	Alphabet Inc.	Mountain
zattoo	Zattoo AG	Zürich,
ZDF Mediathek	Zweites Deutsches Fernsehen AöR	Mainz, Ger-

Source: WIK, PLASMA Database.

Over time, the number of users of the most popular streaming services has remained largely stable, with a slight growth trend. The dominant position of VLOP YouTube is also noticeable here. In terms of user numbers, YouTube is followed by Netflix, Google Play, ZDF Mediathek and ARD Mediathek.

In the video streaming segment, depending on whether the threshold is set at 8 million or 4 million users, four or six more candidates for a VLOP position can be identified. The following streaming services have been identified as potential candidates for a VLOP position: Netflix, Google Play, ZDF Mediathek, and Ard Mediathek for the higher threshold and Amazon Prime Video, Disney+, Joyn and Prosieben for the lower threshold. However, it remains a separate question whether they would meet the additional criteria of the DSA. A statement on this is also made in Chapter 3.2.9.

Figure 3-7: Streaming Video: Development of user numbers (App (MAU) and Web (MUV) 08/2021-06/2024)



Source: WIK, PLASMA Database.

3.2.8 Travelbooking

In the travel booking segment, the PLASMA database includes 32 services from 21 companies. Booking.com is the only service designated as a VLOP in this category. Four companies operate multiple services: Expedia Group leads with four, followed by Bravoventure Spain and Booking Holdings, each with three, and CITIC with two. In terms of company headquarters, twelve services are operated by German companies, eight by

U.S.-based companies, six by EU-based firms, two by UK-based companies, and three by Chinese companies.

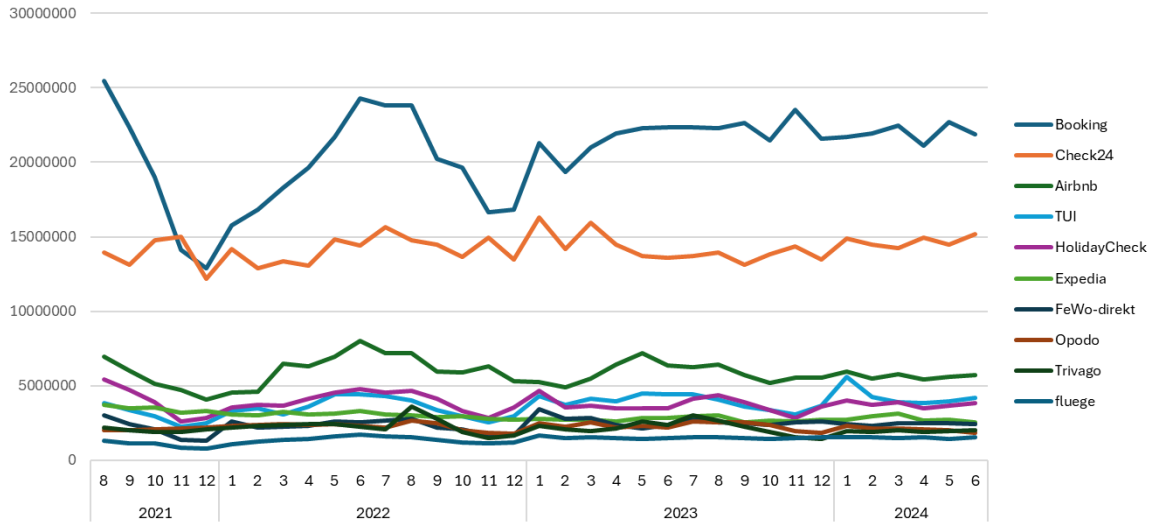
Table 3-9: Travelbooking: Segment overview

Service	Company	Headquarter
Ab-in-den-Urlaub	CITIC Ltd.	Peking, China
Agoda	Booking Holdings Inc.	Norwalk, USA
Airbnb	Airbnb, Inc.	San Francisco, USA
airlinedirect	CITIC Ltd.	Peking, China
Billiger-Mietwagen	Nucom Group SE	Unterföhring, Germany
Booking	Booking Holdings Inc.	Norwalk, USA
Casamundo	HomeToGo SE	Luxemburg, Luxembourg
Check24	CHECK24 GmbH	München, Germany
Expedia	Expedia Group, Inc.	Seattle, USA
FeWo-direkt	Expedia Group, Inc.	Seattle, USA
fluege	CITIC Ltd.	Peking, China
Flugladen	Vivo Holdings Co., Ltd.	London, UK
Happycar	HAPPYCAR GmbH	Hamburg, Germany
HolidayCheck	HolidayCheck Group AG	München, Germany
holidu	Holidu GmbH	München, Germany
Hostelworld	Hostelworld Group PLC	Dublin, Ireland
Hotel.de	HRS Ragge Holding GmbH	Köln, Germany
Hotels.com	Expedia Group, Inc.	Seattle, USA
HRS	HRS Ragge Holding GmbH	Köln, Germany
Lastminute	BRAVOVENTURE SPAIN SL.	Madrid, Spain
Opodo	BRAVOVENTURE SPAIN SL.	Madrid, Spain
Rentalcars	Booking Holdings Inc.	Norwalk, USA
secretescapes	Secret Escapes Ltd.	London, UK
Sonnenklar.tv	RT / Raiffeisen Touristik Group GmbH	München, Germany
Sunnycars	Sunny Cars GmbH	München, Germany
Tourist-online	HomeToGo SE	Luxemburg, Luxembourg
Traum-Ferienwohnungen	Belvilla AG	Eindhoven, Netherlands
Trivago	Expedia Group, Inc.	Seattle, USA
TUI	TUI AG	Berlin, Germany
Urlaubsguru	Urlaubsguru GmbH	Unna, Germany
Urlaubspiraten	HolidayPirates GmbH	Berlin, Germany
weg	BRAVOVENTURE SPAIN SL.	Madrid, Spain

Source: WIK, PLASMA Database.

In the travel booking segment, the VLOP Booking platform is the most popular among users, with Check 24 in second place. Booking has round about 22 million users, while Check 24 has 22 million. Airbnb, TUI and Holidaycheck follow at a considerable distance. User numbers are subject to seasonal fluctuations typical for the segment. Booking's figures appear to exhibit greater volatility than those of the other services, although at a different level.

Figure 3-8: Travelbooking: Development of user numbers (App (MAU) and Web (MUV) 08/2021-06/2024)



Source: WIK, PLASMA Database.

If we apply the hypothetical threshold of 8 million users, no additional service besides the designated VLOP Booking exceed this figure. Reducing the threshold to 4 million would result in the addition of two more services to the pool of candidates – Airbnb and TUI.

3.2.9 Outlook on further segments

Only services operating in market segments where VLOPs have already been identified were considered in the analysis above. However, a legitimate question arises as to whether other segments and services primarily operating in Germany might also be relevant. The PLASMA database contains pertinent data on these segments and services, suggesting that additional candidates with a VLOP-like position in Germany may exist.

While this study cannot test all services in the database against our developed criteria, some considerations can still be made. It is important to note that not all services with over 45 million users in the EU and exceeding our hypothetical thresholds qualify as candidates for designation as VLOPs. Such designation is only applicable if they also meet the criteria for platforms under the DSA. This distinction does not apply to segments like cloud services and messaging applications. According to the DSA, messenger services are classified as transit services rather than online platforms.

In the mobile payment sector, PayPal exceeds the threshold values defined in this report in terms of user numbers. The service is an online platform and can be classified as a two-sided market in economic terms. On one side, merchants use the platform to securely process financial transactions. On the other side, consumers—typically private individuals—use it to make payments on websites or apps. Mobile payment services thus have both buyers and sellers as customers.

In the audio streaming sector, Spotify and Amazon Music are potential VLOPs in Germany, with a user base of over 8 million each. However, these services are unlikely to be classified as platforms under the DSA. They do not offer user-generated content, and the advertising market plays only a minor role. Economically, they do not qualify as two-sided markets.

In the video streaming sector, providers such as Netflix, ZDF Mediathek, Google Play, Disney+, and Amazon Prime Video are notable for their user numbers. However, they do not qualify as online platforms under the DSA, as they solely distribute commercial content in a one-way manner.

4 Discussion on very large online services in Germany

The following table provides a summary of the findings from the analyses conducted in this study while also offering an overview on the presence of relevant individual services in Germany. The segments are categorised into services that have already been designated as VLOPs by the European Commission and those that, according to the analyses, exhibit at least a VLOP- or VLOSE-like status in Germany.

The segments Cloud Networks, Generative AI, and Messengers were excluded from consideration. This exclusion is based on the premise that the European Commission has not designated any VLOPs or VLOSEs in these segments and that the services within them generally do not qualify as online platforms. Consequently, these segments fall outside the scope of the present study.

It could be shown that, measured in AMAR figures, all designated VLOPs/VLOSEs on the European level also have a VLOP/VLOSE-like position in Germany. The only exemption are the services in the adult entertainment segment.

Again, in terms of MAU/MUV, all but Shein's service would have a VLOP-like position. In almost all segments, a number of candidates could be identified that also occupy such a position in Germany.

Table 4-1: Summary: VLOPs/VLOSEs and hypothetical German VLOPs/VLOSEs

	Status	Service	EU Designation VLOP/VLOSE	Hyp. GER VLOP/VLOSE by AMAR	Hyp. GER VLOP/VLOSE by MAU/MUV	
					10% (8 Mio)	5% (4 Mio)
Adult Entertainment	VLOP	Pornhub	✓	✗	(✓)[17]	✓
		Stripchat	✓	✗	(✓)	✓
		Xnxx	✓	NA	✗	✓
		Xvideos	✓	✗	(✓)	✓
	Candidate	Chaturbate	✗	✗	✗	✓
		Livejasmin	✗	✗	✓	✓
		Xhamster	✗	✗	✓	✓
		Xhamsterlive	✗	✗	✗	✓
App Stores	VLOP	Apple App Store	✓	✓	✓	✓
		Google App Store/ Google Play	✓	✓	✓	✓
E-Commerce	VLOP	AliExpress	✓	✓	✓	✓
		Amazon Marketplace	✓	✓	✓	✓
		Shein	✓	✓	✗	✓
		Temu	✓	✓	✓	✓
		Zalando	✓	✓	✓	✓
	Candidate	About You	✗	✗	(✓)	✓
		eBay	✗	✗	✓	✓
		eBay Kleinanzeigen	✗	✗	✓	✓

17 Currently, the numbers are below the threshold, but they were above it in the past.

	Status	Service	EU Designation VLOP/VLOSE	Hyp. GER VLOP/VLOSE by AMAR	Hyp. GER VLOP/VLOSE by MAU/MUV	
					10% (8 Mio)	5% (4 Mio)
		Etsy	✗	✗	✓	✓
		Kaufland	✗	✗	✓	✓
		Mediamarkt	✗	✗	✓	✓
		OTTO	✗	✗	✓	✓
Price Comparisons	VLOP	Google Shopping	✓	(✓)	✓	✓
	Candidates	Idealo	✗	✗	✓	✓
Search Engines	VLOSE	Bing	✓	✓	✓	✓
		Google Search	✓	✓	✓	✓
	Candidate	Yahoo	✗	✗	✗	✓
Social Networks	VLOP	Facebook	✓	✓	✓	✓
		Instagram	✓	✓	✓	✓
		LinkedIn	✓	✓	✓	✓
		Pinterest	✓	✓	✓	✓
		Snapchat	✓	✓	✓	✓
		TikTok	✓	✓	✓	✓
		Twitter / X	✓	✓	✓	✓
	Candidate	Reddit	✗	✗	✓	✓
		Discord	✗	✗	✓	✓
		Twitch	✗	✗	(✓)	✓
		Xing	✗	✗	✗	✓
Streaming Video	VLOP	YouTube	✓	✓	✓	✓
		Amazon Prime Video	✗	✗	(✓)	✓
		ARD Mediathek	✗	✗	✓	✓
		Disney+	✗	✗	✗	✓
		Google Play	✗	✗	✓	✓
		Joyn	✗	✗	✗	✓
		Netflix	✗	✗	✓	✓
		Prosieben	✗	✗	✗	✓
		ZDF Mediathek	✗	✗	✓	✓
Travelbooking	VLOP	Booking.com	✓	NA	✓	✓
	Candidate	Airbnb	✗	✗	✗	✓
		Check24	✗	✗	✓	✓
		TUI	✗	✗	✗	✓
Mobile Payment	Candidate	Paypal	✗	✗	✓	✓
		Payback	✗	✗	✗	✓
Streaming Audio	Candidate	Spotify	✗	✗	✓	✓
		Amazon Music	✗	✗	✓	✓
		Youtube Music	✗	✗	✗	✓
Other Services	VLOP	Google Maps	✓	✓	✓	✓
		Wikipedia	✓	✓	✓	✓

Source: WIK, PLASMA Database.

The German **segment of adult entertainment** is characterized by the presence of numerous strong services alongside the designated VLOPs on the European level. Notably, while some VLOPs may not occupy the same dominant position as they do in the EU,

several other services exhibit comparable strength and, in some cases, even surpass the VLOPs in terms of user numbers and relevance. A similar situation can be observed in the app store segment, where the designated VLOPs hold a comparable market position in both Germany and the EU. At present, no additional candidates can be identified.

The **e-commerce segment** in Germany is highly diverse. While Amazon Marketplace maintains a dominant position both in the EU and in Germany, four additional VLOPs have been designated by the European Commission. With the exception of Shein, all of them hold a comparable market presence in Germany. Moreover, seven additional entities have been identified as demonstrating characteristics indicative of a VLOP-like status. In the price comparison segment, Google Shopping is the only designated VLOP, holding a strong position in Germany. Additionally, one further candidate, Idealo, has been identified as exhibiting characteristics indicative of a VLOP-like status in the German market.

The **search engine segment** is shaped by two designated VLOPs, Google Search and Bing, both of which hold a comparable position in Germany. Furthermore, one additional candidate has been identified that exhibits characteristics analogous to those of a VLOP. In the social networks segment, all designated VLOPs maintain a similarly strong position in Germany as they do across Europe. Additionally, this segment includes two strong candidates, Reddit and Discord, which exceed the hypothetical thresholds in Germany, thereby increasing competition with the designated VLOPs. In addition, two further candidates, Twitch and Xing, have been identified.

YouTube is the only designated VLOP in the **video streaming segment** and holds an analogous position in Germany. Although additional candidates have been identified based on user numbers that exhibit a VLOP-like status in Germany, albeit on a different scale, it is likely that they do not qualify as "true" candidates. Given their current business models, these services cannot be classified as online platforms. However, it remains important to examine the extent to which they may evolve into two-sided markets through increased advertising or the integration of user-generated content.

A similar situation applies to the **travel booking segment**. PLASMA includes numerous companies in this sector, with Booking.com also identified as a (hypothetical) VLOP at the German level. Additionally, three other candidates have been identified. However, it is essential to assess whether these services genuinely qualify as online platforms under the criteria set forth by the Digital Services Act (DSA).

As previously mentioned, two candidates have been identified in the mobile payment sector: PayPal and Payback. Mobile payment remains one of the segments that has not yet been subject to further examination by the European Commission. A similar situation can be observed in the audio streaming segment, which is also covered by PLASMA. The services that could be considered potential candidates based on user numbers, namely Spotify and Amazon Music, do not qualify as online platforms, as they do not facilitate the

provision of user-generated content. However, it seems advisable to continue monitoring the evolution of business models in this sector.

The segment of other services, which includes Wikipedia and Google Maps, completes the list of designated VLOPs. Both positions can be confirmed for Germany. Currently, no additional candidates from the PLASMA database have been identified.

5 Conclusion

This study offers insights into the significance of various online platforms in Germany, with a particular focus on those designated by the European Commission as VLOPs and VLOSEs. Due to their systemic relevance, these platforms are subject to extensive monitoring and special reporting obligations under the DSA. The overarching objective of the DSA is to ensure transparency, accountability, and risk mitigation for platforms that exert a substantial influence on the digital ecosystem.

The findings of the study indicate that the German market holds considerable importance for all analysed VLOPs and VLOSEs, though to varying degrees. While prominent platforms such as Amazon Marketplace and Bing demonstrate notable market presence in terms of user numbers, others, including AliExpress and Facebook, exhibit comparatively lower market relevance in Germany. However, the designation of VLOPs is based on EU-wide thresholds, leading to regulatory imbalances: some designated VLOPs play a minor role in Germany, while other platforms that do not meet the VLOP criteria at the EU level hold substantial market power nationally and compete directly with VLOPs.

To address these imbalances, a national "Digital Services Monitoring" framework could be established to assess platforms that hold substantial market importance in Germany, directly compete with a designated VLOP but are not classified as such due to EU-wide criteria, or pose systemic risks at the national level due to their user base, market power, or content impact. Such a framework would allow regulators to identify and assess platforms that may require additional oversight, even if they do not qualify as VLOPs under the DSA. This approach could complement existing EU regulations and ensure a more balanced digital market in Germany.

While VLOPs are subject to stringent reporting obligations under the DSA, platforms that dominate the German market but are not designated as VLOPs remain largely unregulated in this regard. This discrepancy in regulation has the potential to engender inequitable treatment and regulatory inconsistencies. The uniform EU-wide approach of the DSA does not sufficiently account for national variations in digital markets. Consequently, the introduction of greater flexibility within the DSA framework would be advantageous in ensuring that nationally dominant platforms receive appropriate regulatory attention. Such flexibility could be achieved by enabling member states to impose additional reporting or transparency obligations on platforms with significant national impact. Furthermore, there is a need for greater integration of national authorities into the EU's systemic risk assessment process to ensure that smaller but nationally significant platforms are not overlooked.

While the DSA provides a structured approach to platform regulation, it is essential to further assess whether additional national oversight mechanisms are required to address potential systemic risks on the national level effectively. The implementation of a national monitoring framework would serve to prevent market imbalances, promote fair competition, and enhance platform accountability within the German digital ecosystem.

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