



OUTLOOK 2027 · EUROPE AND THE GCC

The Invisible Shortlist

AI already shapes which hotels your guests consider. Your analytics miss most of it, and your invoices do not name what it costs.

Cross-Point · Riccardo Giacometti

A briefing for revenue and distribution managers, owners and asset managers, and general managers of independent and chain hotels.

Edition 1, September 2026 · Research cutoff 26 September 2026 · Horizon: calendar year 2027



SECTION 1 · EXECUTIVE DECISION MAP

Five findings to carry into your 2027 budget and partner conversations

Each number comes with its unit, its base and its evidence status. The units differ on purpose: citations, links, visits and room nights answer different questions. Confidence labels are the research team's, unchanged.

FINDING 01

<1% of room nights

AI bookings are marginal. Booking Holdings puts traffic from large language models at “significantly below 1%” of its room nights; Expedia calls agentic traffic “small”.^{1,2,3} Guests shortlist in AI answers and still book through familiar channels.

VERIFIED

HIGH CONFIDENCE

FINDING 04

Jan 2027 DSA duties for ChatGPT

Europe changes through rules first. ChatGPT became a very large online search engine under the DSA on 31 August 2026, with added duties by January 2027.⁷ The DMA hotel remedy binds classic search; its reach into AI surfaces stays under “dialogue”.⁸ In-assistant checkout is a US story: the EEA is excluded.⁹

VERIFIED

MEDIUM CONFIDENCE

FINDING 02

79.1% of hotel links

The shortlist has layers. In Google AI Mode, intermediaries supply 46.6% of citations, yet 79.1% of hotel links land on a Google Business Profile and 3.6% on an OTA.⁴ Paid ChatGPT hotel slots go 87.7% to OTAs in one US teardown.⁵

QUALIFIED

MEDIUM · CITATION PATTERN

LOW · PAID SLOTS

FINDING 05

8% media fee, AI engines named

Costs arrive without an “AI” label. Marriott’s 2026 Residence Inn franchise document lists AI engines among the channels of an existing 8% media fee.¹⁰ We found no OTA invoice with an AI line and no owner recharge clause; paid visibility still runs through commission uplifts and cost per click.^{11,12,13}

QUALIFIED

MEDIUM · OPACITY

LOW · SIZE

FINDING 03

8.8% of AI-influenced visits

Most AI influence is invisible in your analytics. In a cross-industry Similarweb panel, only 8.8% of AI-influenced visits carry an AI referrer; 55.9% arrive as search and 19.9% as direct.⁶ Since 31 August 2026, even outside tracking of AI Mode links has broken.⁴

QUALIFIED

HIGH · SUPPRESSION

LOW · HOTEL SIZE

HOW TO READ THIS BRIEFING

Every figure traces to an evidence ledger row (section 15). **Verified** means the source states it. **Qualified** means it holds with the stated caveat. **Low confidence** marks a single vendor source or an undisclosed method. **Not found** means we searched and found no public evidence; it never means “does not exist”.

Confidence labels (High, Medium, Low) rate the evidence behind a signal. From section 3 onward each carries a signal ID (SIG-A-xx) that links to the register in section 15.

Three units run through the document: **influence** (citations, recommendations, stated use), **engagement** (visits, clicks) and **transaction** (bookings, room nights). We never put two of them on one axis.

SECTION 1 · EXECUTIVE DECISION MAP

What each role should do now, prepare in 2027, watch and ask

The matrix summarises section 12. Every action rests on evidence in this briefing; where evidence is missing, the action is to ask, measure or watch, never to spend on a promise.

ROLE	DO NOW	PREPARE IN 2027	WATCH	ASK YOUR PARTNERS
Revenue and distribution manager	Build an “AI referrers” channel group in analytics and log the ChatGPT share of it; expect it to be small and mostly ChatGPT. Record your Business Profile link and price accuracy monthly.	Keep AI figures in three units (influence, engagement, transaction) in every report. Prepare a spot-check routine: three assistants, five booking-style prompts, once a month.	Booking and Expedia LLM disclosures each quarter; a re-run of the AI Mode link study after ads; any hotel-level conversion data for AI-referred visits.	Your analytics provider: how do you classify Gemini and AI Mode clicks? Your OTA: which paid programme touches AI answers, and on which invoice line?
Owner or asset manager	Ask for the fee schedule of every brand, operator and OTA contract and mark which lines can carry AI placement (media funds, marketing fees, CPC programmes).	Budget lost search clicks and paid placement as ordinary distribution cost, not as an “AI” line. Write an information right into any new marketing-fund or media clause.	Marriott, Hilton and IHG franchise documents in spring 2027; any AI-labelled fee on an OTA invoice; the Commission’s statement on the DMA remedy and AI surfaces.	Your brand or operator: does our media or marketing fee now fund AI-engine placement, and how is it reported to us? What share of the digital programme is recharged?
GM, independent hotel	Fix the basics you control: an accurate, complete Business Profile, valid structured data on the website, and a booking engine that shows live rates. Low effort, no proven uplift, no downside.	Watch your OTA dependence in a year when Google’s EEA supplier unit loses live prices and filters. Plan your direct offer (rate, cancellation terms, perks) for guests who arrive via search after an AI shortlist.	The 2027 Bitkom and HOTREC waves; Google’s EEA hotel units after the DMA remedy; whether ChatGPT ads reach hotel queries in Europe.	Your OTA: what does a visibility programme cost as a commission uplift, and does it touch AI answers? Your web agency: which schema fields are valid today (test them, no score exists)?
GM or commercial lead, chain hotel	Confirm with the brand which AI channels the central team handles (apps in ChatGPT, AI Mode checkout partnerships, paid slots) and what stays with the hotel (listing accuracy, local content).	Prepare for the first year of US AI checkout and paid AI placement at your brand; loyalty share of room nights is your anchor (Marriott about 68%, IHG 66%).	Brand disclosures on AI-engine media spend; ChatGPT’s ad repository after January 2027; the brand’s AI Mode partner status in the EEA.	Your brand: how is AI-engine placement reported to owners, and which KPI shows its return? Which merchant-of-record and loyalty links hold inside agentic flows?



Image generated for this briefing (Higgsfield); illustrative, no real property shown.

SECTION 2 · WHAT PEOPLE SAY VS WHAT THEY DO

Travellers describe AI use in majorities. Their measured behaviour shows small minorities.

Ask a traveller whether they feel confident using AI and most say yes. Ask what they did on their last hotel search and the share drops to a fifth or less. Measure what reaches a hotel website, and the share falls below one percent. The three numbers on the right are three different units. Each is true. None answers the other two questions.

The gap has a simple mechanism. Surveys measure attitude and memory. Panels measure clicks that carry a label. Company disclosures measure bookings. AI sits early in the journey, so it leaves the fewest traces where hotels measure most.¹⁴

Definitions: **influence** = citations, recommendations, stated use; **engagement** = sessions, clicks; **transaction** = bookings, room nights. An **OTA** (online travel agency) is a booking site such as Booking.com or Expedia.

Say vs do: three units, three very different numbers

Stated use, measured engagement and disclosed transactions, side by side. The panels share no axis.

INFLUENCE (STATED)

19%

of Germans have already used AI for accommodation recommendations; a further 44% would consider it.

Bitkom, n=1,004, telephone, weeks 17 to 21 of 2026.¹⁵

ENGAGEMENT (MEASURED)

0.90%

of hotel-website sessions arrived with an AI referrer, up from 0.51% eleven weeks earlier.

17,000+ hotel websites, global vendor panel, 16 Mar to 31 May 2026.¹⁶

TRANSACTION (DISCLOSED)

<1%

of Booking Holdings' room nights come from large-language-model traffic, "significantly below 1%".

Booking Holdings, global, Q2 and Sep 2026.^{1,2}

Sources as noted. Units: percent of respondents; percent of sessions; percent of room nights. Evidence ledger L022, L005, L001.

MYTH VS EVIDENCE

Myth: "AI already delivers a meaningful share of bookings." **Evidence:** the only disclosed transaction figures are Booking's sub-1% and Expedia's "small".^{1,3} A hotel-side survey reports 4% of reservations "influenced by AI search", with the method undisclosed and "influenced" undefined.^{17,18} Influence and bookings are different units; keep them apart.

Why survey figures run from 4% to 88%: the question decides the answer

Questions about a specific past action yield minorities. Questions about confidence, or about AI users only, yield majorities. Willingness to hand over the booking is lowest of all.

Start hotel research with AI (from 1%)

SiteMinder, 12,000 travellers, 14 countries, 2026

Rely on AI platforms to plan a trip

YouGov for Expedia, 5,700+, US, UK, India, 2026

Would book solely on AI's advice

Censuswide for Qlik, 2,001, US, 2026

Used AI for accommodation recommendations

Bitkom, 1,004, Germany, 2026

Used any generative AI in 3 months, any purpose

Eurostat, EU27, ages 16 to 74, 2025

Used generative AI for trip research

Phocuswright, US travellers, 2026

Hotel research as an AI task

Phocuswright, German and UK AI users only, 2026

Would book directly inside an AI platform

Phocuswright, US travellers, 2026

Feel confident using AI in 2026 to plan and book

OnePoll for Skyscanner, 22,000, 18 markets, 2025

Use AI tools to plan summer vacations

Censuswide for Qlik, 2,001, US, 2026

Used AI to research or plan a vacation

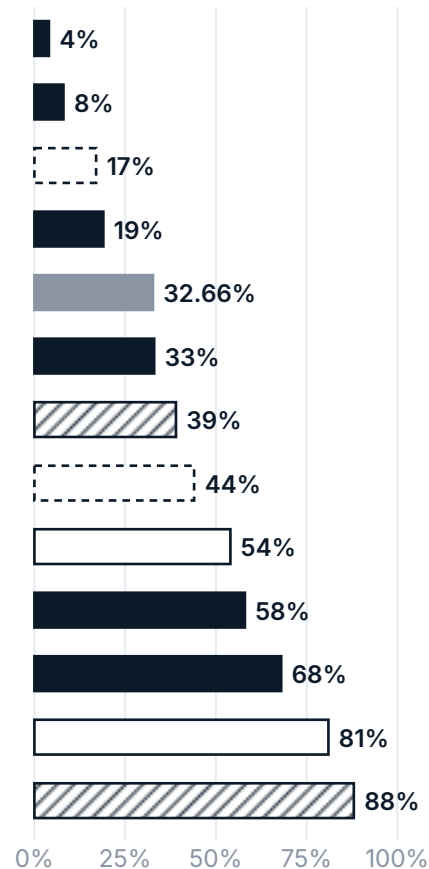
Marriott Bonvoy research, Saudi respondents, 2026

Feel confident using AI to plan and book, UAE

OnePoll for Skyscanner, UAE respondents, 2025

Say AI shaped an actual trip decision

Phocuswright, German AI users only, 2026



■ Did you do it? (stated past behaviour) ■ AI users only ■ Any AI use, any purpose
 □ Do you feel confident? (attitude) ▨ Would you hand over the booking?

Sources as labelled on each bar; all are stated preferences (influence unit). Vendor and sponsor surveys are named as such; the Eurostat row is official statistics on any AI use, not travel. Ledger L022 to L034. ^{15,19,20,21,22,23,24,25,26}

What the spread means for you

A figure like “81% of UAE travellers feel confident using AI” measures mood in a Skyscanner survey.¹⁴ A figure like “19% used AI for accommodation tips” measures a remembered action in a Bitkom survey.¹⁵ Both are stated. Neither is a booking.

Read the base before the number. Phocuswright’s 39% and 88% describe AI users only; among all travellers the shares are smaller.²⁴ Eurostat’s 32.66% covers any generative-AI use in three months, for any purpose, and it splits sharply by age: 63.81% of 16-to-24-year-olds against 6.5% of 65-to-74-year-olds.²³

Growth is slower than the headlines. Bitkom’s accommodation item moved from 22% in 2025 to 19% in 2026, with no published margin of error and bases that may differ. That reads as no visible growth.^{15,27} SiteMinder’s “AI as starting point” went from 1% to 4% while OTA starts rose from 18% to 26%.¹⁹

WHAT WE DON'T KNOW YET

No survey splits AI research use by business versus leisure traveller, or by luxury versus midscale guest. Traveller type appears only as age.²⁸ No observed rate-shopping data attributable to AI exists; the only figure, 44% of US travellers acting on price comparisons, is stated.²²

Illustration, not data: a 40-room family hotel in Tyrol will see a handful of AI-referred sessions a month. The guests who read an AI answer and then typed the hotel’s name into Google are counted as “organic search”.



Image generated for this briefing (Higgsfield); illustrative, no real property shown.

SECTION 3 · DISCOVERY AND TRANSACTION: THE THREE LAYERS OF THE SHORTLIST

AI reads OTAs, links to Google listings, and sells its paid slots mainly to OTAs

The shortlist an assistant produces has three layers, and each has a different owner. The **citation layer** is what the model reads: in Google AI Mode, intermediaries (metasearch, review sites, OTAs) supplied 46.6% of 84,329 citations, hotel sites 21.2% and Google itself 19.9%.⁴ The **link layer** is where the guest can click. Of 6,130 hotel links, 79.1% went to a Google Business Profile, 16.6% to the hotel website and 3.6% to an OTA.⁴ The **paid layer** is who buys the sponsored slots: in one teardown of US free-tier ChatGPT, OTAs held 87.7% of hotel ad slots.⁵

All three figures come from one vendor-affiliated author, with 4,000 queries across eight cities on 2 and 3 February 2026.^{4,29} Treat them as a dated snapshot and, in the author’s own words, a “pre-ads baseline”.⁴ Independent GEO audits put intermediaries at 44% to 55% of citations, which points the same way.^{30,31}

GBP = Google Business Profile, the property listing Google shows in Maps and Search. **Metasearch** = price-comparison sites such as trivago or Google Hotels. **GEO** = generative-engine optimisation, work that aims to be cited by AI answers.

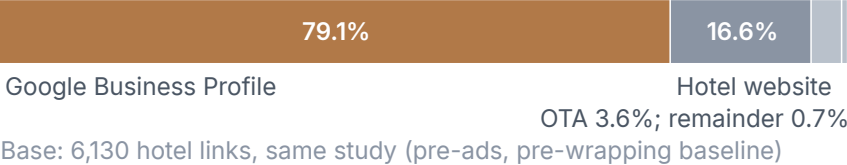
Three layers, three owners: intermediaries are read, Google is linked, OTAs are paid

Share of each base; the three bars have different bases and dates.

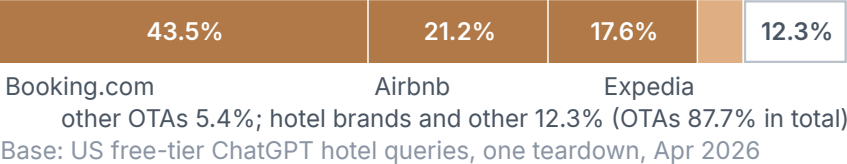
Citations
what AI Mode reads



Links
where the hotel link goes



Paid slots
who buys ChatGPT hotel ads



Citations and links: Sitter, Google AI Mode Hotel Study 2026, 8 cities, 4,000 queries, 2 to 3 Feb 2026 (pre-ads, pre-wrapping baseline). Paid slots: Sitter, Anatomy of ChatGPT hotel search 2026, US free tier, from 31 Mar 2026, one teardown. Vendor-affiliated author.^{4,5} Evidence ledger L035, L036, L043.

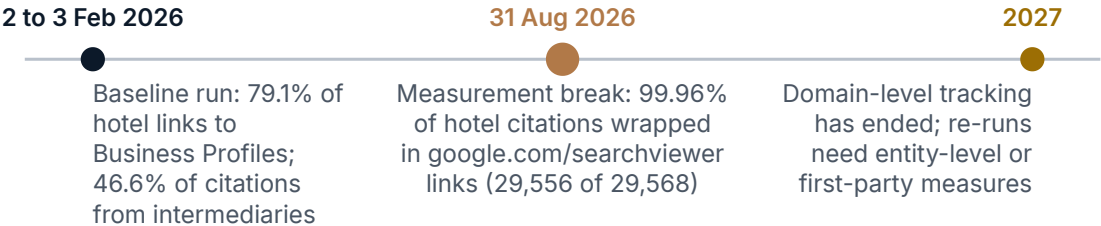
Chains and independents, luxury and midscale: who appears where

Chain domains lead generic queries. In DACH, chain and multi-property domains score 36.2 on a vendor visibility index against 11.2 for independents (section 8).³² Independents win property links in distinctive niches: across 25 cities, GPT 5.2 linked 53.9% independents and 37.2% chains, and London and Paris ran about 69% independent.³³

Stars decide the exit route. Five-star hotel links went 55.8% to chains and about 2% to OTAs; three-star links went 18.7% to chains and 28.8% to OTAs.³³ In plain terms: a midscale hotel is more often shown through an OTA, a luxury hotel more often through its own brand.

Answers are narrow and unstable. maxonline describes AI answers that name “three, four, maybe five” properties with reasons, and adds: “there is no page two”.³² A peer-reviewed test found fifteen runs of one ChatGPT prompt returned only seventeen of roughly 2,000 German Christmas markets, with an identical top three.³⁴ Position-1 stability in AI Mode hotel queries averaged 50.5%, from 17 to 23% in London to 82 to 90% in Bordeaux.³⁵

Since 31 August 2026 the outside view of AI Mode links has closed



Sitter, Google AI Mode Hotel Study 2026, September 2026 update. The 99.96% describes scraped URLs, not clicks or referrers.⁴ Evidence ledger L036, L039.

WHERE THE ADS SIT TODAY

In US free-tier ChatGPT, sponsored ads appeared in 20 to 35% of hotel queries from 31 March 2026. Booking.com held 43.5% of slots, Airbnb 21.2% and Expedia 17.6%; only Preferred, Barceló and Marriott advertised among hotel brands.⁵ Google said in May 2026 it was “testing new ad formats in Search”; trade press reported invitation-only placement inside the AI answer from July.^{36,37} A law-firm blog reports ads for European ChatGPT free users from late August; hotel inventory there is unmeasured.³⁸

“*Treat the 79%-stays-on-Google finding above as pre-ads baseline until that happens.*”

Nicolas Sitter, Google AI Mode Hotel Study 2026, on the re-run he plans once ads appear in AI Mode results⁴

CLAIM CHECK

Circulating claim: “ChatGPT sends most hotel traffic to OTAs.”
Evidence: across ChatGPT, Gemini, Perplexity and Grok, 75% to 91% of hotel links go directly to hotel websites. Every model consults an OTA or metasearch source in more than half of runs.³³ **Status:** Qualified (one vendor family). The reading side favours OTAs; the linking side favours hotels and Google.

CONFIDENCE **SIG-A-03 MEDIUM** **SIG-A-04 MEDIUM** **SIG-A-06 LOW**

OUTLOOK 2027 **WELL-SUPPORTED CONTINUATION** citations and links

PLAUSIBLE CONDITIONAL DEVELOPMENT paid layer



Image generated for this briefing (Higgsfield); illustrative, no real property shown.

SECTION 4 · THE ATTRIBUTION BLIND SPOT

Your analytics record most AI-shaped demand as search or direct

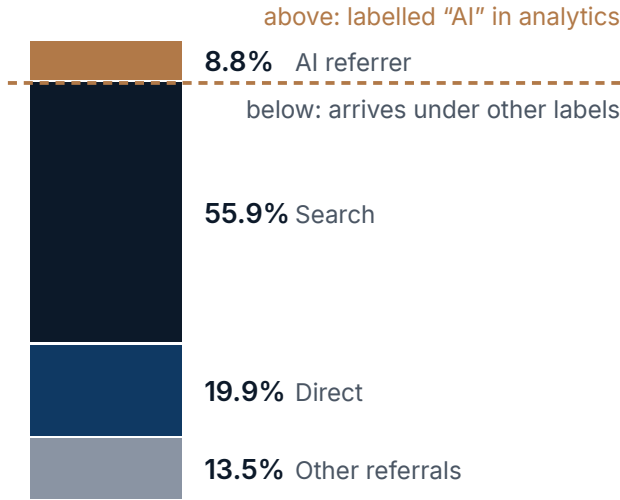
Two mechanisms hide the influence. Clicks from Google’s AI surfaces (AI Overviews, Gemini, AI Mode) arrive with a google.com or no-referrer label, indistinguishable from ordinary Google clicks.¹⁶ And a guest who reads an AI answer often returns later by typing your name into a search box.

The only downstream study is cross-industry. Similarweb followed US desktop users after ChatGPT recommended a brand. Recommended brands were 2.5 times more likely to be visited within seven days, and only 8.8% of those AI-influenced visits carried an AI referrer.^{6,39} The travel pair in that panel was Skyscanner and Kayak. No hotel study was found, and no hotel conversion data for AI-referred visits is published.^{16,28}

Inference, marked as such: if that 8.8% ratio held for hotels, the 0.90% AI-referrer share in the hotel panel would imply AI-influenced visits near 10% of sessions (0.90 divided by 0.088). An illustration only; it shows that 0.9% is a floor.^{6,16}

Of AI-influenced visits, one in eleven is labelled “AI”

Cross-industry, US desktop; a measurement of the web in general, not of hotels.



100% = visits influenced by an AI recommendation

Similarweb panel via PPC Land and Saliency, Jul to Dec 2025; secondary accounts, primary report inaccessible.^{6,39} Ledger L016, L017.

Do AI answers cut clicks? The general-search studies disagree

STUDY	FINDING
Pew, US, Mar 2025	Link click on 8% of visits with an AI summary vs 15% without; 900 adults, observed ⁴⁰
Seer, 2024 to 2025	Organic CTR 1.76% to 0.61% on 3,119 informational queries ⁴¹
Ahrefs, Feb 2026	Position-1 CTR 58% lower; forecast design ⁴²
SparkToro/Datos, 2024	No differential US change; clickstream ⁴³
Semrush, 2025	Zero-click 33.75% to 31.53%; same-keyword before/after ⁴⁴

All US or UK, general web. **No travel or hotel subgroup exists in any of them.** Any hotel click-through figure you are quoted has no public basis.⁴⁵ Counter-evidence stays visible: in the hotel panel, direct (+14%) and organic (+7%) traffic grew alongside AI (+102%) over eleven seasonal weeks.¹⁶

CONFIDENCE SIG-A-05 HIGH · SUPPRESSION
LOW · HOTEL SIZE



Image generated for this briefing (Higgsfield); illustrative, no real property shown.

SECTION 5 · WHERE THE BOOKING ACTUALLY HAPPENS

The merchant of record stays with hotels and OTAs; in-assistant checkout is a US story for now

Google’s AI Mode hotel booking, live in the US from 27 August 2026, is “available in all supported AI Mode locations and languages, excluding EEA countries and territories”.⁹ Next come Canada and Australia, then the UK; no EEA or GCC date has been announced.⁴⁶ Even there, “the hotel or booking platform will act as the merchant of record”.⁹

OpenAI moved the other way: in March 2026 it shifted ChatGPT from completing transactions to discovery and moved Instant Checkout into third-party apps; “OpenAI is not the merchant of record”.^{47,48} Brand apps redirect: IHG’s app in ChatGPT guides guests to IHG’s direct channels, Accor’s to the ALL platform.^{49,50} Perplexity is the exception, booking about 140,000 hotels in-app; its Europe and GCC share is unknown.⁵¹ Trust does the rest: 66% of surveyed travellers would not trust AI to book on their behalf.²⁰ Microsoft Copilot’s “Actions” can book through Booking.com; no hotel-specific audit exists.⁵²

Merchant of record = the party that takes the payment and owns the customer relationship. **Agentic checkout** = a booking completed by the assistant inside the chat.

SURFACE	WHERE THE BOOKING COMPLETES	MARKETS	STATUS
Google AI Mode	Partner completes; hotel or platform is merchant of record; Google shares “only the minimum data needed to complete a booking”, per Skift ⁵³	US; EEA excluded; Canada, Australia, UK next ⁴⁶	VERIFIED
ChatGPT	Discovery; checkout moved to apps; brand apps redirect to brand engines ^{47,49,50}	Global apps; ads in US free tier, reported in Europe ³⁸	VERIFIED
Perplexity	In-app booking, about 140,000 hotels via Selfbook ⁵¹	Geography not disclosed	QUALIFIED
GCC platforms	Almosafer claims a flow “to the final booking and transaction” (unverified); Wego: “booking still happens on Wego” ^{54,55}	Saudi Arabia, GCC	QUALIFIED
Hotel-side tools	SiteMinder’s Demand Plus shows live rates in ChatGPT and Claude and completes on the hotel’s own booking page ⁵⁶	Global	VERIFIED

“You are the Merchant of Record. You retain full ownership of your customer relationships, booking data, and the post-stay experience.”

Google, UCP for Lodging FAQ, 2026⁵⁷

THE CHAIN ANCHOR

Loyalty members booked about 68% of Marriott’s global room nights in 2025 (75% in the US) and 66% of IHG’s.^{58,59} That base, plus launch-partner status in AI Mode checkout, is what chains bring to agentic flows.⁵³

SIG-A-07

HIGH · MERCHANT OF RECORD

MEDIUM · VOLUME

SECTION 6 · MONEY: WHO PAYS FOR THE SHORTLIST

Costs arrive without an “AI” label: lost clicks, paid placement, and media fees that now name AI engines

No public document shows an AI fee on a hotel invoice. Paid OTA visibility runs through existing forms: Booking.com’s Visibility Booster is a commission uplift, Expedia’s TravelAds charge per click, and HRS bills EUR 2.50 per room on net corporate rates (since January 2020).^{11,12,13}

One brand document has moved. Marriott’s Residence Inn franchise disclosure (31 March 2026) lists “AI engines (Google, OpenAI, Anthropic)” among the channels of its franchisee-paid Transaction-Based Media Program. The fee is 8% of applicable gross room revenues, capped at \$200 per stay, payable only when the guest stays. The March 2025 JW Marriott and Fairfield documents carry the same fee without AI engines: one US brand, an existing fee widened in scope.^{10,60}

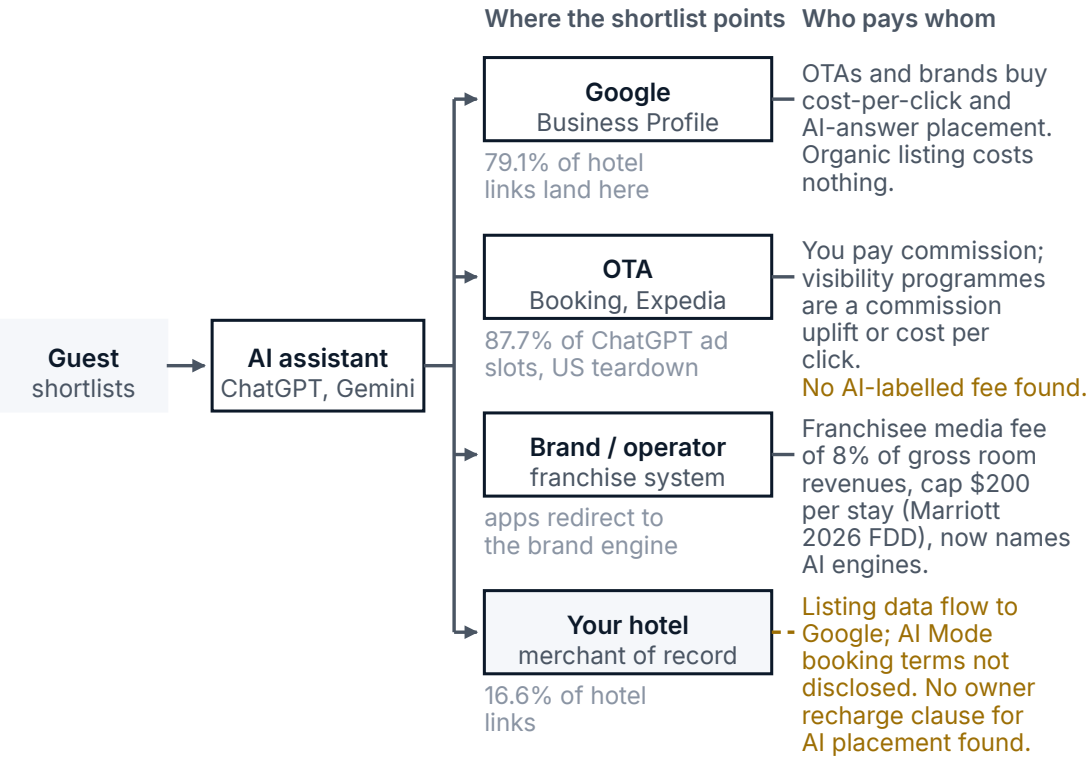
Larger bills are indirect. Booking’s CEO said AI Overviews pressured its organic search in Q2 2026.⁶¹ Booking wrote down KAYAK by \$457 million in Q3 2025, citing “expected increases in customer acquisition costs” for metasearch.⁶² Marriott plans \$1.0 to 1.1 billion of 2026 investment, 35% to 40% of it digital, “the overwhelming portion” reimbursed by owners over time.⁶³ Hilton’s annual report warns that large language models could “increase our hotels’ cost of sales”.⁶⁴ OTA marketing ratios show no AI step-change yet: Booking 4.7% of gross bookings (4.6% a year earlier), Expedia 6.2% (6.3%).^{65,66}

QUESTIONS TO ASK

Your brand or operator: Does our media or marketing fee now fund AI-engine placement, and how is it reported? **Your OTA:** Which programme buys placement in AI answers, and on which invoice line? **Your metasearch partner:** How has cost per booking moved since AI Overviews grew?⁶⁷

Who pays whom for the shortlist, and which flows nobody discloses

Solid: documented flows. Amber, dashed: terms or amounts not found in any public document. Citation shares are in section 3.



Booking.com, Expedia and HRS partner terms; Marriott 2026 Residence Inn FDD, Item 6 fn 14; Sitter ChatGPT teardown (US free tier); Skift on AI Mode booking terms.^{5,10,11,12,13,53} Evidence ledger L043, L065, L067, L127, L128.

NOT FOUND / NOT DISCLOSED

No OTA AI fee to DACH partners (Booking.com, Expedia, HRS; HRS terms inaccessible); a 2026 survey of 171 Swiss hotels records none either.⁶⁸ No owner recharge clause naming AI placement; no AI fee in Hilton’s 2025 franchise document or Accor’s registration document.^{69,70} No owner-level P&L line for AI distribution cost in the European distribution study or owner advisories. No public GCC AI-referral data. Google’s AI Mode commercial terms for hotels beyond “minimum data”.^{45,53,71,72} Each is a documented search, not a finding of absence.

SIG-A-12 MEDIUM · OPACITY LOW · SIZE WELL-SUPPORTED CONTINUATION

SECTION 7 · RULES THAT LAND IN 2027

Europe changes through regulation first: a DMA remedy for classic search, DSA duties for ChatGPT, and an AI Act that covers interaction rather than ranking

In force or announced before the cutoff (Jul to Sep 2026)

- **23 Jul 2026** DMA decision: EUR 460m fine, hotels named; AI surfaces under “dialogue”
- **2 Aug 2026** AI Act Article 50 transparency duties apply
- **27 Aug 2026** AI Mode hotel checkout live in the US; EEA excluded
- **31 Aug 2026** ChatGPT designated a VLOSE under the DSA
- **8 Sep 2026** Google announces its EEA travel-search changes

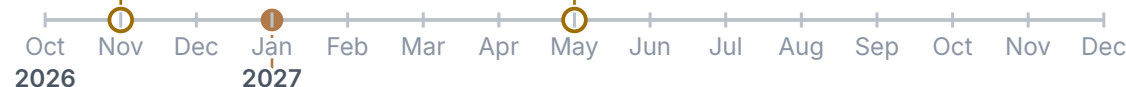
Dated for 2027 (solid) and expected or undated (hollow)

Q4 2026 (indicated)

Digital Fairness Act proposal;
cannot apply in 2027

May 2027 (expected)

Google Marketing Live: AI Mode
ad status and checkout markets



By Jan 2027

ChatGPT's added DSA duties: risk assessment, public ad repository

Undated in 2027 (watch)

- Google checkout: Canada, Australia, then UK; no EEA or GCC date
- Commission statement on the DMA remedy and AI surfaces

Sources: Commission IP/26/1670 and IP/26/1772; Skift on Google's EEA changes; AI Act Art. 50 FAQ; EP legislative train; PPC Land on UCP markets. ^{7,8,46,73,74,75} Ledger L082 to L103.

RULE	WHAT IT MEANS FOR A HOTEL, IN ONE SENTENCE
DMA (Digital Markets Act) decision, 23 Jul 2026	Google was fined EUR 460 million for favouring its own "shopping, hotels, transport and sports results"; on AI Overviews and AI Mode the Commission says "dialogue will continue". ⁸
Google's EEA changes, 8 Sep 2026	Separate units for aggregators and direct suppliers; the supplier unit loses date filters, live prices and tags; Google says updates "where relevant, will apply" to its AI surfaces, a company statement. ⁷³
DSA (Digital Services Act): ChatGPT designated, 31 Aug 2026	ChatGPT "qualifies as an online search engine" and must meet added duties by January 2027, including a public ad repository; Articles 26 and 27 bind online platforms, not search engines. ^{7,76,77}
AI Act Article 50, from 2 Aug 2026	Transparency duties for AI interaction and generated content, fines up to EUR 15 million or 3% of turnover; the article does not govern ranking. ⁷⁴
UCPD point 11a (in force)	Undisclosed paid ranking is blacklisted "irrespective of the technological means used" and the directive names accommodation search; untested on AI answers. ⁷⁸
Digital Fairness Act (proposal, Q4 2026)	A proposal can shape debate in 2027; it cannot bind anyone in 2027. ⁷⁵

DSA AND DMA, KEPT APART

The **DMA** governs gatekeepers' conduct, such as Google favouring its own hotel results. The **DSA** governs platforms' and search engines' duties to users; **VLOSE** = very large online search engine. No travel-specific DSA proceeding, request for information or decision was found between February 2024 and the cutoff.^{45,79}

CONFIDENCE SIG-A-08 MEDIUM

THE GERMAN ROUTE

OLG Hamm (12 May 2026, not final) held a company liable for its chatbot's misleading statements; a law firm argues a "Sponsored" label may fall short under unfair-competition law; scenario S4 tracks the first ruling.^{38,80}

COUNTER-EVIDENCE

Google claims earlier DMA changes cut direct-booking traffic by 30%, a disputed figure.⁷³ trivago's CFO calls the remedy "a structural tailwind".⁸¹

OUTLOOK 2027 PLAUSIBLE CONDITIONAL DEVELOPMENT



Image generated for this briefing (Higgsfield); illustrative, no real property shown.

SECTION 8 · DACH: THE INDEPENDENTS' VISIBILITY GAP

Independent DACH hotels score a fraction of chain domains in AI answers; the cash question is commission, direct share and paid visibility

Three country cards, no combined ranking. The visibility score is one agency's black-box metric (maxonline, Semrush AI Visibility, 515 four- and five-star hotels, 472 of them independents). The direct-share series is HOTREC's, with a German sample that shrank from 747 to 462 hotels, so part of the German fall may be composition.^{32,71,82}

GERMANY

11.2 /100

Independent 4- and 5-star hotels, AI visibility score, Jul 2026 (vendor)

52.6% direct

Direct share of overnights 2025, from 58.5% in 2023 (n 747 to 462)

SME hotels book 60.6% direct against 43.6% for chain hotels (2025). Germany's hotel homepages carry JSON-LD structured data least often among major markets: 45.6% against 67.1% in France.^{71,83}

Any generative-AI use, 2025: 32.25% of individuals (Eurostat).

AUSTRIA

9.6 /100

Independent 4- and 5-star hotels, AI visibility score, Jul 2026 (vendor)

58.7% direct

Direct share of overnights 2025, from 58.3% in 2023 (n 133 to 94)

Lowest visibility score of the three, flat direct share. Homogeneous resorts score lowest: Lech am Arlberg 8.5, the Carinthia region 4.4. The ÖHV calls Google's paid AI slots "exclusive and expensive", without prices.^{32,67}

Any generative-AI use, 2025: 39.42% of individuals (Eurostat).

SWITZERLAND

14.3 /100

Independent 4- and 5-star hotels, AI visibility score, Jul 2026 (vendor)

58.6% direct

Direct share of overnights 2025, from 60.1% in 2023 (n 186 to 165)

The lead rests on a handful of historic world brands; without them Switzerland sits at the German and Austrian level (unweighted direct share). Own-website bookings cancel at about 10% against about 21% at Booking.com (171 hotels).^{32,84}

Any generative-AI use, 2025: 47.02% of individuals (Eurostat).

CONFIDENCE

SIG-A-04 MEDIUM

SIG-A-09 MEDIUM

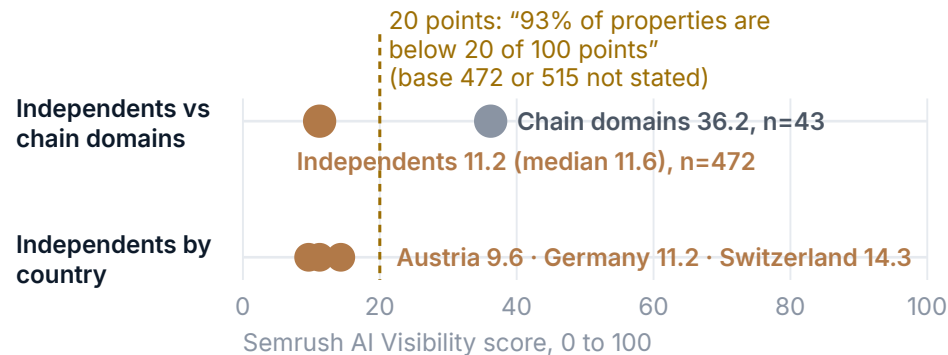
VISIBILITY SCORES

LOW CONFIDENCE, SEE LEDGER

Sources: maxonline GEO-Studie Hotellerie 2026 (agency study, single metric, no query list)³²; HOTREC/HES-SO European Hotel Distribution Studies 2024 and 2026^{71,82}; Eurostat isoc_ai_iiau²³; Sitter schema study (Germany crawled, Austria and Switzerland not)⁸³. Ledger L026, L052 to L062.

Chain domains score three times higher than independents on one vendor's AI visibility index

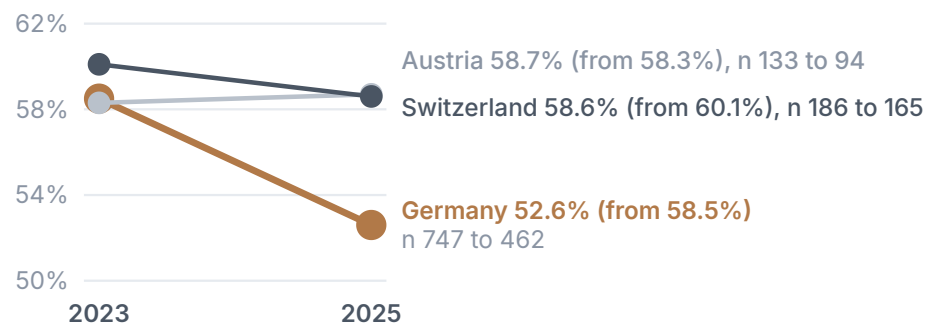
Model-based score for purchase-near, brand-free queries (higher = named more often); the agency describes its values as indicative.



maxonline, GEO-Studie Hotellerie 2026, Semrush AI Visibility, 515 four- and five-star hotels in DE/AT/CH, fieldwork July 2026. Agency study that sells GEO services; single commercial source, black-box score.^{32,85} Ledger L052.

Germany's direct share fell 5.9 points while Austria and Switzerland held

The study never asks about AI as a channel, so this series cannot prove or disprove an AI effect.



Direct bookings as % of overnights, chain-inclusive, weighted (Switzerland unweighted); reference years.

HOTREC/HES-SO European Hotel Distribution Studies 2024 (reference year 2023) and 2026 (reference year 2025); German sample changed from 747 to 462.^{71,82} Ledger L055.

The cash-flow mechanics behind the scores

Visibility scores describe who gets named. Money moves through three older channels. **Commission:** Booking Holdings holds 68.8% and Expedia 16.6% of European OTA bookings, 85.4% together, and 51% of hotels report OTA rate undercutting.⁷¹ **Direct share:** a booking on the hotel website averaged US\$516 against US\$312 through an OTA in SiteMinder's platform data, and Swiss own-website bookings cancel at half the OTA rate.^{84,86} **Paid visibility:** commission uplifts and cost per click, with no AI line found on any invoice.^{11,12}

Parity has already moved. Booking removed parity obligations in the EEA ahead of its 13 November 2024 DMA deadline; a working paper on earlier national bans finds prices 0% to 4% lower with no occupancy effect.^{87,88} In Switzerland, where parity clauses are banned, 29% of hotels still report influence on their direct prices.⁸⁴

Illustration, not data: a franchised midscale hotel in Munich pays commission on OTA bookings, a brand marketing fee that may now fund AI-engine placement, and metasearch cost per click. None of the three invoices says "AI". The owner sees a higher distribution line and no explanation.

WHAT THE SCORES CANNOT TELL YOU

A different vendor construct (Nokumo) ranks the three countries in the opposite order: Austria 40.1, Germany 38.9, Switzerland 37.6.⁸⁹ The two indices measure different things with undisclosed prompt sets. Use either as a spot check, never as a benchmark. The "93% below 20 points" statistic sits in maxonline's independents paragraph; its base, 472 or 515, is not stated.³²

NOT FOUND

No observed DACH cost data for structured-data, Business Profile or analytics work. With no binding requirement, these are voluntary implementation costs, and any cost band you are quoted needs a new study.⁴⁵



Image generated for this briefing (Higgsfield); illustrative, no real property shown.

SECTION 9 · GCC: PRINCIPLES ON PAPER, DATA STILL MISSING

The Gulf reports the highest stated AI confidence and no observed AI-referral data

WHAT WE DON'T KNOW

No GCC platform or tourism authority discloses an AI-referral share or observed AI-use data for hotel research; ten adversarial queries and checks on five companies found in-house AI metrics only.^{28,45,90} Kuwait, Qatar, Bahrain and Oman appear in no traveller data in our corpus.

What is published is stated preference. In Skyscanner’s OnePoll survey, 81% of UAE and 80% of Saudi respondents “feel confident about using AI in 2026 to plan and book travel”, among the highest of 18 markets alongside India at 86%.^{14,25} Marriott Bonvoy research reports 68% of Saudi respondents had used AI to research or plan a vacation.²⁶ Both are sponsor surveys of stated behaviour.

Observed data are on-platform only. Seera reports +24% conversion for customers who use its AI review tagging, a machine-learning feature inside the app, restated differently in a later deck.^{91,92} Booking.com holds an estimated 60% of Saudi OTA hotel value against 11% for Almosafer.⁹¹ Any 2027 channel reading is confounded by the war: Marriott’s Middle East RevPAR fell 43% in Q2 2026.⁹³

Platforms move without publishing data: Skyscanner and Almosafer launched ChatGPT apps on 8 April 2026 (section 5 has their booking claims), and Google names no GCC checkout market.^{46,94}

INSTRUMENT	STATUS	WHAT IT COVERS, AND WHAT IT DOES NOT
GCC Secretariat AI ethics manual (2025)	Non-binding	Ethics principles at GCC level; no travel-booking or disclosure fields. ⁹⁵
UAE AI Charter (Jun 2024)	Non-binding	Principles; UAE consumer law requires accurate advertising and clear prices. ^{96,97}
Saudi Arabia: SDAIA AI guidelines	Non-binding	No tourism provisions; the PDPL (binding) covers tourists’ data. ^{96,98}
Qatar Central Bank AI Guideline (2024)	QCB-licensed only	Financial sector only. ⁹⁹
Bahrain AI bill (Shura-approved 2024)	Not found enacted	Art. 8 names tourism; government objection Nov 2024. ^{96,100}
Oman, Kuwait: AI programme and strategy drafts	Drafts	Strategy documents; no distribution rules. ¹⁰¹

No “GCC unified framework” for AI in travel booking and no consultation draft was found in English or Arabic searches of the GCC Secretariat’s library or in the UN Tourism Kuwait conclusions of February 2026.^{45,102} Whether EU rules reach GCC-located users turns on recipient location, a question for counsel.^{45,76}

CONFIDENCE SIG-A-11 MEDIUM OUTLOOK 2027 INSUFFICIENT BASIS TO ASSESS behaviour WELL-SUPPORTED CONTINUATION rules

SECTION 10 · SCENARIOS FOR 2027

Five scenarios, each with a trigger you can observe and a sign that arrives before the effect

The outlook labels are the research team's and stay as written; they are qualitative, never probabilities. In the EEA, S1 and S4 carry the strongest evidence. In the US, 2027 is plausibly the year agentic checkout and paid placement are tested at volume.²⁸

S1

EU status quo plus DMA reshuffle (base case)

TRIGGER

Google's unit split is implemented; no EEA checkout date appears.

EARLY WARNING SIGN

Commission monitoring statements; the shape of Google's EEA hotel units.

WHO WINS OR LOSES

Supplier units lose live prices; independents lean harder on OTAs; aggregators call it a tailwind.

WELL-SUPPORTED CONTINUATION

S2

Paid AI layer scales, OTA-concentrated

TRIGGER

AI Mode ads leave testing; EEA ChatGPT hotel advertisers become visible.

EARLY WARNING SIGN

ChatGPT's DSA ad repository after January 2027; a second slot audit.

WHO WINS OR LOSES

Independents' acquisition cost rises; OTAs and large brands hold the paid slots.

PLAUSIBLE CONDITIONAL DEVELOPMENT

S3

Metasearch cost squeeze

TRIGGER

AI Mode keeps referring out on a small share of queries.

EARLY WARNING SIGN

trivago's Developed Europe return on ad spend (122.1% to 121.0% in Q2 2026).

WHO WINS OR LOSES

Metasearch weakens; Google gains; hotels see higher cost per booking from that channel.

PLAUSIBLE CONDITIONAL DEVELOPMENT

S4

Disclosure enforcement test

TRIGGER

A court or regulator applies UCPD point 11a or German unfair-competition law to a sponsored AI answer.

EARLY WARNING SIGN

BGH review of OLG Hamm; a first ruling on sponsored AI content.

WHO WINS OR LOSES

A clearer paid-versus-organic split in answers; labelling costs for advertisers.

PLAUSIBLE CONDITIONAL DEVELOPMENT

S5

EEA or GCC agentic entry

TRIGGER

Google names an EEA or GCC checkout date.

EARLY WARNING SIGN

The UCP FAQ; Google Marketing Live 2027.

WHO WINS OR LOSES

Launch partners (chains, large OTAs) capture early volume; merchant of record stays with them.

SPECULATIVE SCENARIO

TWO MORE TO KEEP IN VIEW

Attribution breakthrough: a hotel downstream-lift study or an OTA disclosure would give owners negotiating evidence; panels adding booking events is the sign.

PLAUSIBLE CONDITIONAL DEVELOPMENT

GCC recovery confounds AI: if Middle East demand normalises, recovery drives channel shifts that will be misread as AI effects. Marriott's Middle East RevPAR fell 43% in Q2 2026; Accor's H1 RevPAR rose 4.6% excluding the region.^{93,103}

INSUFFICIENT BASIS TO ASSESS

Sources for triggers and indicators: Commission IP/26/1670; trivago Q2 2026 call; Wettbewerbszentrale on OLG Hamm; Google UCP FAQ; PPC Land.^{8,46,57,80,81}

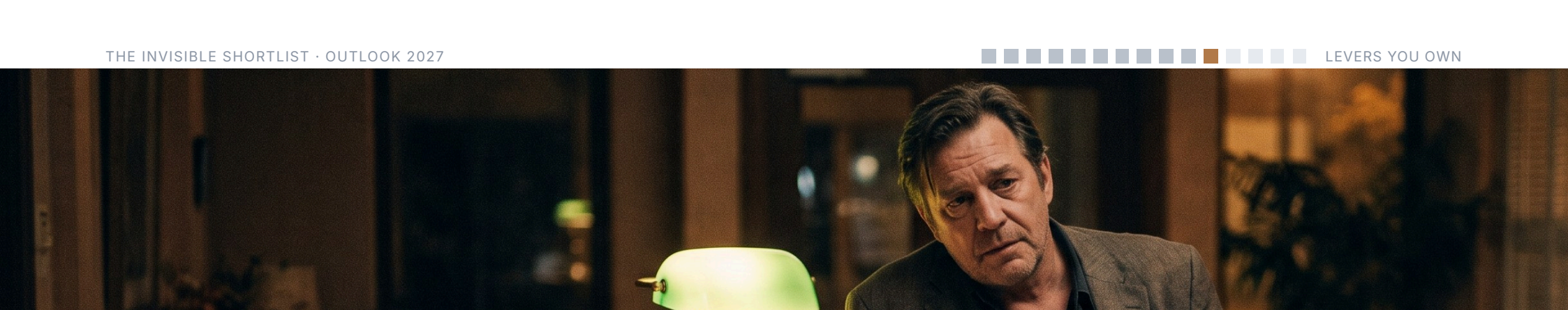


Image generated for this briefing (Higgsfield); illustrative, no real property shown.

SECTION 11 · THE LEVERS YOU OWN

Three low-regret jobs for 2027: no required fields, no proven uplift, limited referrers

Honesty first. Google states that AI features carry “no additional technical requirements”.¹⁰⁴ The one controlled study of adding schema (1,885 pages against about 4,000 controls, 30 days) found no significant lift in AI Mode or ChatGPT citations. AI Overviews citations fell 4.6%; no hotels were included.¹⁰⁵

The three jobs are hygiene that pays regardless: accurate listings serve the guest who arrives via search, valid markup serves ordinary search, and an AI channel group gives you a number instead of an argument. No cost data were found, so we give none.^{45,106}

TRY THIS: A 10-MINUTE SPOT CHECK

Ask three assistants for “a hotel like yours” in your town, with a date and a budget. Note who is named, what is cited and where the link goes. Repeat monthly with the same prompts. A spot check, not a measurement: answers change between runs.³⁵

Q1 2027 · BUSINESS PROFILE

LOW EFFORT

- ☐ Verify name, address, category, amenities and photos on your Google Business Profile; 79.1% of AI Mode hotel links landed there in the February 2026 baseline.⁴
- ☐ Check the link from the profile to your booking engine and that live rates show where Google displays prices.
- ☐ Align your facts with what OTAs publish; one vendor estimate links 89% of hotels in ChatGPT to Google Place IDs.⁵

Q2 2027 · STRUCTURED DATA

MEDIUM EFFORT

- ☐ Add or repair Hotel schema on the website; 36.3% of hotel homepages carry none and 41% of those with it use the wrong type.⁸³
- ☐ Keep prices visible on the page: no AI system read prices placed only in hidden markup in one test.¹⁰⁷
- ☐ Treat any “schema score” a vendor sells you as their metric; no such Google metric appears in Google’s documentation, and Google’s optional fields stay optional.^{45,108}

Q3 2027 · AI CHANNEL GROUP

LOW EFFORT

- ☐ Create a channel group for AI referrers (chatgpt.com, perplexity.ai, copilot, claude.ai); expect ChatGPT to dominate it, 98.8% in the hotel panel.¹⁶
- ☐ Label the limit in every report: Gemini and AI Mode clicks arrive as google.com or with no referrer.¹⁶
- ☐ Track sessions, bookings and cancellation rate; ask how ChatGPT ad clicks are classified, one agency found them all credited to “AI Assistant”.¹⁰⁹

MACHINE READABILITY: PREPARE, DO NOT PAY FOR PROMISES

Google’s Universal Commerce Protocol (UCP, its agentic checkout standard) has launch partners that are chains, OTAs and Amadeus, and Google says the integration “does not influence how we rank”.^{46,57} Amadeus’s CTO calls the Model Context Protocol (MCP, a way to expose data to agents) “an important first step but not enough”.¹¹⁰ No reservation-system vendor publishes adoption figures.²⁸

CONFIDENCE

SIG-A-10 LOW

OUTLOOK 2027

WELL-SUPPORTED CONTINUATION

EVIDENCE

VERIFIED

Google’s statements

QUALIFIED

the crawls

NOT FOUND

uplift and cost

SECTION 12 · WHAT THIS MEANS FOR YOU

Do now, prepare in 2027, watch, and ask: revenue managers and owners

Revenue and distribution managers

You want to know where AI-shaped demand shows up in your data, what paid AI placement costs, and what to measure.

DO NOW	PREPARE IN 2027	WATCH	ASK YOUR PARTNERS
- Report AI in three units every month: citations you observe in spot checks (influence), the AI referrer group (engagement), bookings from it (transaction).²⁸ - Fix Business Profile and price accuracy first; the link layer runs through Google.⁴ - Write down what your analytics cannot see: Gemini and AI Mode clicks land as google.com.¹⁶	- Expect a paid layer where OTAs hold most slots; cost per click of \$3 to 3.50 and CPM of \$49 to 60 are one agency's figures, no sample disclosed.¹⁰⁹ - Plan a direct-offer test for guests who arrive via search after an AI shortlist (rate, cancellation, perks). - Prepare a re-run of your spot check after Google's AI ads leave testing.	- Booking and Expedia LLM-share and marketing ratios each quarter; a low-single-digit LLM share would change section 2.^{65,66} - Any hotel-level conversion data for AI-referred visits; none was found.¹⁶ - The Adobe conversion gap: 28% below in May 2026, reported near 1% by July.^{111,112}	- Analytics provider: how are Gemini, AI Mode and ChatGPT ad clicks classified? - OTA account manager: which programme buys placement in AI answers, on which invoice line, at what basis (commission uplift or CPC)?^{11,12} - Metasearch partner: cost per booking since AI Overviews expanded.

Owners and asset managers

You want to know who pays: commission, ads, brand media fees, recharged digital spend. And what to ask brands and operators.

DO NOW	PREPARE IN 2027	WATCH	ASK YOUR PARTNERS
- Map every contract line that can carry AI placement: marketing funds, media programmes, CPC programmes, digital recharges. - Read the brand's current franchise disclosure; Marriott's 2026 Residence Inn document names AI engines inside an 8% media fee capped at \$200 per stay.¹⁰ - Book lost search clicks and paid placement as distribution cost; there is no AI line to wait for.⁷¹	- Write an information right into new marketing-fund or media clauses: what is bought, where, at what return. - Budget the digital recharge: Marriott expects "the overwhelming portion" of its digital programme reimbursed by owners over time.⁶³ - Ask for AI acquisition-cost or RevPAR evidence before approving AI-labelled spend; none is disclosed today.²⁸	- Spring 2027 franchise documents from Marriott, Hilton and IHG.^{10,69} - The Commission's statement on the DMA remedy and AI surfaces.⁸ - Any OTA invoice with an AI-labelled line; we found none.⁴⁵	- Brand or operator: does our media or marketing fee now fund AI-engine placement, and how is it reported to us? - Operator: which AI channels are central, which are property-level, and who carries the cost of each? - Lender or valuer: how do they treat distribution cost trends in 2027 underwriting?

SECTION 12 · WHAT THIS MEANS FOR YOU

Do now, prepare in 2027, watch, and ask: general managers, independent and chain

General managers of independent hotels

You want to stay visible in AI answers and do what is cheap and sensible now.

DO NOW	PREPARE IN 2027	WATCH	ASK YOUR PARTNERS
- Complete and verify the Business Profile; check that the link to your booking engine works and shows live rates.⁴ - Repair the website's structured data and keep prices visible on the page.^{83,107} - Run the monthly 10-minute spot check (section 11) and keep the log.	- Watch your OTA dependence in a year when Google's EEA supplier unit loses live prices and date filters.⁷³ - Plan a direct offer for guests who find you through an AI answer and then search your name. - Decide in advance what you will not buy: no schema score, no cost band without a study.⁴⁵	- Bitkom's summer 2027 wave: an already-used figure clearly above 22% would mark real growth.^{15,27} - Whether ChatGPT ads reach hotel queries in Europe; unmeasured so far.³⁸ - Your own AI referrer group, once three months of data exist.	- OTA: what does a visibility programme cost as a commission uplift, and does it touch AI answers?¹¹ - Web agency: which schema fields are valid today, tested with Google's tools, and what do they charge per hour? - Local association: does the next distribution survey ask about AI as a channel? HOTREC's does not.⁷¹

General managers and commercial leaders in chain hotels

You want to know what the brand handles, what stays with the hotel, and where the chain advantage holds.

DO NOW	PREPARE IN 2027	WATCH	ASK YOUR PARTNERS
- Confirm the split with the brand: apps in ChatGPT, AI Mode checkout partnerships and paid slots sit centrally; listing accuracy and local content stay with you.^{49,50} - Check your property's data in the brand's central feeds; chain domains lead generic AI queries, individual properties still need correct listings.³² - Anchor on loyalty: about 68% of Marriott's and 66% of IHG's room nights come from members.^{58,59}	- Expect the first full year of US AI checkout and paid placement at your brand; EEA hotels feel the classic-unit DMA change first.^{9,73} - Prepare owner questions before they arrive: which fee funds AI placement, how is it reported. - Keep merchant-of-record and loyalty links inside any agent flow.⁵⁷	- Brand disclosures on AI-engine media spend and its return. - ChatGPT's DSA ad repository from January 2027: the first view of hotel advertisers outside the US.⁷ - The brand's AI Mode partner status if an EEA date appears; none has been announced.⁴⁶	- Brand: how is AI-engine placement reported to owners, and which KPI shows its return? - Brand: which markets are in scope for AI checkout, and what changes for the hotel's payment and data flows? - Regional team: is there a central spot-check routine, and can the hotel see its results?

SECTION 13 · THE 2027 WATCHLIST

Twelve dated indicators; each names the threshold that would change a finding in this briefing

WHEN	WHAT TO WATCH	WHAT WOULD CHANGE THE READING
Late Oct to early Nov 2026, then quarterly	Booking Holdings and Expedia Q3 results: LLM share of room nights, marketing ratios, agentic commentary	A low-single-digit LLM share would falsify “transactions stay marginal” ^{65,66}
Q4 2026 to 2027	Commission statement on whether Google’s DMA hotel remedy covers AI Overviews and AI Mode	Explicit inclusion or exclusion ends the “dialogue” ⁸
Q4 2026 (indicative)	Digital Fairness Act proposal	Scope on ranking and AI answers; cannot apply in 2027 ⁷⁵
January 2027	ChatGPT’s added DSA duties: first risk assessment, public ad repository	OTA share of hotel advertisers in the repository, the first test outside the US ^{7,76}
February 2027	Marriott 10-K for 2026: digital recharge and AI risk language	Any quantified AI distribution cost ⁵⁸
Spring 2027	Marriott, Hilton and IHG franchise disclosure documents	AI engines named in more media fees; any discrete AI fee ^{10,69}
May 2027 (expected)	Google Marketing Live and the UCP FAQ: AI Mode ad status, checkout markets	Any EEA or GCC date; buyer mix of AI Mode ads ^{36,57}
2027, undated	Re-run of the AI Mode hotel link study after ads and wrapping	OTA links well above 3.6% would change the link layer ⁴
Summer 2027	Bitkom travel wave, accommodation-recommendation item	Already-used share clearly above 22% ¹⁵
2027	BGH review of OLG Hamm; first German ruling on sponsored AI content	A ruling sets the disclosure test for AI answers ⁸⁰
2027 to 2028	HOTREC/HES-SO next wave with a stable German panel; an AI channel question	Decline persisting on a stable panel; any AI channel share ⁷¹
Ad hoc	Seera, Wego or Cleartrip AI-channel data; a readable UAE AI charter	Any observed GCC AI-referral share ^{55,90}

Thresholds come from the research run’s watchlist where it gives one; the others are analyst-proposed and marked as such in the evidence package.²⁸

SECTION 14 · MYTHS WE RETIRED AND CLAIMS WE COULD NOT VERIFY

Circulating claims, what the evidence shows, and the status we give them

RETIRED: REJECTED BY THE RESEARCH RUN

CIRCULATING CLAIM	WHAT THE EVIDENCE SHOWS	ID
AI referrals convert at 11.4% against 5.3% for organic search	An all-web blend dominated by e-commerce; the travel cut converts below the all-industry average	REJ-A-01 ¹¹³
Expedia's 141 vs 277 pages viewed prove AI has not shortened the path to purchase	A snapshot from a 2023 report series with no AI variable	REJ-A-02 ¹¹⁴
Material European or GCC in-assistant hotel booking in 2027	The EEA is excluded from AI Mode checkout; no GCC market is named	REJ-A-03 ^{9,46}
Machine-readable content is a disclosed AI ranking gate	Google: its booking integration "does not influence how we rank"; no platform publishes criteria	REJ-A-04 ⁵⁷
DSA Articles 26/27 already bind ChatGPT's answers	ChatGPT is designated a search engine; those articles bind online platforms	REJ-A-05 ^{7,76}

Retired figures never serve as evidence in this briefing. They appear here so that omission is not mistaken for absence of analysis.²⁸

COULD NOT VERIFY: CORRECTED OR NOT FOUND AFTER DOCUMENTED SEARCH

CIRCULATING CLAIM	WHAT WAS SEARCHED AND FOUND	STATUS
A "Classic Search" or SparkToro study behind the 46.6%, 79.1% and 99.96% figures	All three are Nicolas Sitter's figures; SparkToro's 2026 study measures zero-click searches	CORRECTED 4,115
A "DACH Market Observatory" benchmark by HOTREC, IHA, DEHOGA or HSMA (Q3 2026, 515 hotels)	The 515 hotels are maxonline's, an agency study with one metric; Q3 2026 ended after the cutoff	CORRECTED 32,45
"4% of bookings come from AI"	The State of Distribution landing page says 4% of reservations are "influenced"; method undisclosed	CORRECTED 17
Google "Hotel Center API v3.2" with mandatory EEA fields; a "Diagnostics API v1.7" with a schema completeness score	No such versions or field in current or archived documentation; fields optional; no EEA mandate	NOT FOUND 108,116
A "London Hotel Market Monitoring Framework" with a validated 20-point threshold	No institution or validation found; the nearest "20" is maxonline's distribution statistic	NOT FOUND 45
OTA invoices with a "Generative Search Placement Fee", partly recharged to owners; brand contract clauses on AI fees; per-property cost bands from a survey of 42 hotels	No such invoices, clauses, survey or cost data in any public document; paid visibility is commission- or CPC-based	NOT FOUND 11,12,45
A GCC "Generative AI Compliance Guide" consultation draft and a unified framework	Neither title found in English or Arabic; national instruments are non-binding or sector-specific	NOT FOUND 95,102
Booking Holdings: "We have no referral data for GCC AI bookings"	Not found; the verified statement is the global "significantly below 1% of our room nights"	NOT FOUND 1
Barceló's "Trinity Standard" with schema and profile-accuracy targets, a DACH pilot, a "compliance passport" and a "compliance cliff"	Barceló's public strategies are "Vision 2031" and "Barceló Regen"; visibility work is voluntary, no binding hotel-level AI compliance obligation found	NOT FOUND 45,117,118

"Not found" records a logged search outcome (repositories, query variants, access barriers), never proof of nonexistence. The search log sits in the replication appendix.⁴⁵

SECTION 15 · METHOD, CONFIDENCE AND THE EVIDENCE LEDGER

How every number was checked, and how to read the labels

Two research runs, one audit. A structured research run (221 evidence rows, 108 sources, adversarial review) produced the signal register with confidence and outlook labels.²⁸ A claim-verification audit then tested 22 propositions circulating on the same topic, with a gap register and a search log; where the audit corrects or narrows the run, the audit wording wins.⁴⁵

Evidence ledger. This briefing uses 134 ledger rows and 127 numbered sources. Each row carries the value with unit, base, period, source and evidence ID, and a status. Full ledger, chart data and search log: replication appendix.



Confidence labels (High, Medium, Low) rate the evidence behind each signal; the reason follows the label. **Outlook labels** describe 2027: well-supported continuation or change; plausible conditional development; speculative scenario; insufficient basis to assess. Both are qualitative. We never convert them to percentages.²⁸

Units stay apart. Influence (citations, recommendations, stated use), engagement (sessions, clicks) and transaction (bookings, room nights) never share an axis. Inferences are marked as inferences. “Not found” means we searched and did not find; it never means “does not exist”.

Limits. Every hotel-level AI citation audit in the corpus is vendor-run, and four studies share one author who works for a visibility vendor.²⁹ GCC observed behaviour, business-versus-leisure splits and hotel-level conversion for AI-referred guests were not found in public sources. Counter-evidence stays visible where it matters: additive AI traffic in one panel, null schema results, mixed click studies. Nothing here is legal or financial advice.

WHAT WOULD SETTLE THE OPEN QUESTIONS: A 2027 RESEARCH AGENDA (PROPOSALS, NONE CARRIED OUT)

OPEN QUESTION	MINIMUM EVIDENCE	SUGGESTED ROLE
Does any DACH OTA invoice carry an AI-labelled line?	Redacted invoices after July 2026: invoicing entity, verbatim line label, fee basis, contract clause, country, owner pass-through. ⁴⁵	Finance controller or franchise counsel, authorised by the owner
What does visibility work cost a DACH independent?	30 to 50 properties across DE, AT and CH in three room-count strata; one-off vs recurring, external invoices vs internal hours, cost per room-night.	Independent researcher
Does structured data lift AI citations for hotels?	Randomised sites: valid price and amenity markup vs broad markup vs no change; weekly share of fixed prompts naming the property, 8 weeks before and after.	Independent researcher; a pilot sets the variance

GLOSSARY

AI Mode Google’s conversational search; AI Overviews are its summaries above results.	CPC / CPM Cost per click / per thousand impressions.	FDD Franchise disclosure document: the US filing that lists franchisee fees.	Merchant of record The party that takes the payment and owns the customer relationship.	RevPAR Revenue per available room.
Agentic checkout A booking the assistant completes inside the chat.	DMA Digital Markets Act: EU rules for gatekeepers such as Google.	GBP Google Business Profile: the listing shown in Maps and Search.	Metasearch Price-comparison sites such as trivago or Google Hotels.	Structured data Machine-readable markup describing the hotel, prices and amenities (schema).
CAC Customer acquisition cost: marketing spend per booking.	DSA Digital Services Act: EU duties for platforms and search engines; VLOSE = very large online search engine.	GEO Generative-engine optimisation: work aimed at being cited by AI answers.	OTA Online travel agency, such as Booking.com or Expedia.	UCP / MCP Google’s agentic-checkout protocol; the Model Context Protocol exposes data to agents.

SOURCES

- [1] Skift, "Booking CEO: building the AI travel agent isn't the hard part", 23 Sep 2026.
- [2] GuruFocus, Booking Holdings (BKNG) Q2 2026 earnings call highlights, 2026.
- [3] The Motley Fool, Expedia Group Q2 2026 earnings call transcript, 12 Aug 2026.
- [4] Sitter, N., "Google AI Mode Hotel Study 2026: where do hotel links actually go?", 3 Feb 2026, updated Sep 2026. Vendor-affiliated author.
- [5] Sitter, N., "Anatomy of ChatGPT hotel search 2026", 2026 (US free tier, from 31 Mar 2026). Vendor study.
- [6] PPC Land, "Your analytics are lying: Similarweb traces AI recommendations to real traffic", 2026.
- [7] European Commission, IP/26/1772, "Commission designates ChatGPT, Reddit and Roblox under the Digital Services Act", Aug 2026.
- [8] European Commission, IP/26/1670, "Commission fines Google €890 million", 23 Jul 2026.
- [9] Google, "Book travel with AI Mode", The Keyword, 27 Aug 2026.
- [10] Marriott International, 2026 Residence Inn Domestic Franchise Disclosure Document, 31 Mar 2026, Item 6, footnote 14.
- [11] Booking.com for Partners, "All you need to know about the Visibility Booster", Sep 2026.
- [12] Expedia Group, "TravelAds and sponsored listings" (pay-per-click advertising), Sep 2026.
- [13] Tageskarte, "AGB-Änderung: HRS verlangt zukünftig Transaktionskosten für Firmenraten", 29 Nov 2019.
- [14] Skyscanner, "Horizons 2026: planning trends", 2025.
- [15] Bitkom, "Reiseziel, Restaurant, Route: Wo KI zum Reisebegleiter wird", press release, 2026.
- [16] Sitter, N., "The ChatGPT direct-traffic explosion for hotels 2026" (The Hotels Network panel), 2026. Vendor study; author works for Lighthouse.
- [17] RateGain, NYU SPS Jonathan M. Tisch Center and HEDNA, "The State of Distribution 2026", landing page, Sep 2026.
- [18] RateGain, "NYU SPS, HEDNA and RateGain release State of Distribution 2026", press release, 15 Sep 2026.
- [19] SiteMinder, "Changing Traveller Report 2026", press release, 2026.
- [20] Expedia Group, "The AI trust gap: why travelers continue to choose trusted brands" (YouGov, 5,700+ respondents, US, UK, India), Mar 2026.
- [21] Qlik, "AI has become the preferred vacation planning tool", press release (Censuswide, n=2,001 US), 2026.
- [22] Phocuswright, "The AI sure hits its stride: 5 takeaways for travel leaders", 2026.
- [23] Eurostat, dataset isoc_ai_iaiu, "Use of generative AI tools by individuals", 2025.
- [24] Phocuswright, "AI isn't just for research anymore: what European travelers are actually doing with it", 2026.
- [25] Skyscanner, "Horizons 2026".
- [26] Economy Middle East, "Saudi travelers embrace AI and flexible booking" (Marriott Bonvoy "Ticket to Travel" research), 2026.
- [27] Bitkom, "Mehrheit würde sich von KI den kompletten Urlaub planen lassen", press release, 2025.
- [28] Cross-Point research run hospitality-2027-ai-hotel-choice-3763ba, "AI and the hotel choice in 2027", 26 Sep 2026: report, evidence package (221 rows), signals register.
- [29] Sitter, N., About page, Sep 2026.
- [30] cloro, "Which hotels ChatGPT recommends", 2026.
- [31] Hotel Technology News, "Research: OTAs dominate as primary source in AI-powered hotel discovery" (Cloudbeds), Jul 2025.
- [32] maxonline, "GEO-Studie Hotellerie 2026: KI-Sichtbarkeit von 500 Hotels", Jul 2026.
- [33] Sitter, N., "AI Hotel Landscape 2026: how ChatGPT, Gemini, Perplexity and Grok recommend hotels", 2026 (25 cities, Jan 2026). Vendor study.
- [34] Administrative Sciences (MDPI), "Undeclared selection criteria" (ChatGPT and German Christmas markets), 2026.
- [35] Sitter, N., "AI hotel rankings consistency study 2026", 2026. Vendor study.
- [36] Google, "New Gemini-built ad formats", Google Marketing Live, 20 May 2026.
- [37] Hospitality.today, "Google's now selling placement inside the AI answer, starting with IHG, by invitation only", 27 Jul 2026.
- [38] WBS.LEGAL, "Werbung im KI-Chatbot: die strengen Vorgaben zur Werbekennzeichnung bei ChatGPT", 27 Aug 2026.
- [39] Salience, "The downstream impact of AI visibility" (Similarweb study), 22 Jul 2026.
- [40] Pew Research Center, "Google users are less likely to click on links when an AI summary appears in the results", 22 Jul 2025.
- [41] Seer Interactive, "AIO impact on Google CTR: September 2025 update", 4 Nov 2025.
- [42] Ahrefs, "AI Overviews reduce clicks by 58%" (update), 4 Feb 2026.
- [43] SparkToro and Datos, "2024 zero-click search study", 2024.
- [44] Semrush, "AI Overviews' impact on search in 2025", 15 Dec 2025.
- [45] Cross-Point claim-verification audit, run hospitality-ai-claim-audit-0e44e4, 26 Sep 2026: report, gap register (22 rows) and search log.
- [46] PPC Land, "Google expands UCP to hotels, food delivery and three new countries", 2026.
- [47] Skift, "ChatGPT bails on transactions", 5 Mar 2026.
- [48] OpenAI, developer documentation, "Agentic commerce: key concepts", 2026.
- [49] IHG Hotels & Resorts, "IHG advances conversational AI search capabilities", press release, 2026.
- [50] Accor, "Accor launches the ALL Accor app in ChatGPT", press release, 2026.
- [51] Skift, "Perplexity now handles hotel bookings: what our tests show", 27 Mar 2025.
- [52] Hospitality.today, "Microsoft Copilot just became your personal travel assistant", 2025.
- [53] Skift, "Google's agentic hotel booking tool comes to AI Mode", 27 Aug 2026.
- [54] ZAWYA, "Almosafer becomes Saudi Arabia's first ChatGPT-integrated app", press release, 2026.
- [55] Wego, "Your AI assistant can now plan your trip with Wego", 7 Sep 2026.
- [56] SiteMinder, "SiteMinder brings AI hotel distribution to conversational environments", press release, 2026.
- [57] Google for Developers, "Universal Commerce Protocol (UCP) for Lodging: FAQ", 2026.
- [58] Marriott International, Form 10-K for fiscal year 2025, 2026.
- [59] InterContinental Hotels Group, Annual Report and Form 20-F 2025, 2026.
- [60] Marriott International, 2025 JW Marriott / Marriott Hotels Domestic Franchise Disclosure Document, 31 Mar 2025.
- [61] Skift, "Booking Holdings saw pressure from Google's AI Overviews", 4 Aug 2026.
- [62] Booking Holdings, Form 10-K for fiscal year 2025, 2026.
- [63] The Motley Fool, Marriott International Q4 2025 earnings call transcript, 10 Feb 2026.
- [64] Hilton Worldwide Holdings, Form 10-K for fiscal year 2025, 2026.

SOURCES (CONTINUED)

- [65] Booking Holdings, Q2 2026 earnings release, 4 Aug 2026.
- [66] Expedia Group, second quarter 2026 results, Aug 2026.
- [67] ÖHV (Österreichische Hoteliervereinigung), OTS press release "Hotelsuche per KI", 29 Jul 2026.
- [68] Hotellerie Gastronomie Zeitung, "Buchungsplattformen setzen Hotels weiter unter Druck", 2026.
- [69] Hilton, 2025 US Franchise Disclosure Document (Hilton brand), Mar 2025.
- [70] Accor, 2025 Universal Registration Document, 27 Mar 2026.
- [71] HOTREC and HES-SO Valais-Wallis, "European Hotel Distribution Study 2026" (reference year 2025; 2,713 hotels), 2026.
- [72] HVS, "Hotel profitability in transition: cost pressures and budgeting priorities for 2026", 2026.
- [73] Skift, "Google strips out EU travel search features to avoid more fines", 8 Sep 2026.
- [74] European Commission, "Transparency obligations under Article 50 AI Act", FAQ, 2026.
- [75] European Parliament, Legislative Train Schedule, "Digital Fairness Act", 2026.
- [76] Regulation (EU) 2022/2065 (Digital Services Act), EUR-Lex, 19 Oct 2022. Articles 2, 3, 26, 27, 34, 35, 38, 39, 56.
- [77] Freshfields, "DSA decoded 4: advertising under the DSA", 2025.
- [78] Unfair Commercial Practices Directive 2005/29/EC as amended, Annex I point 11a and recital 22.
- [79] European Commission, list of designated very large online platforms and search engines, updated 31 Aug 2026.
- [80] Wettbewerbszentrale, "OLG Hamm lässt Unternehmen für Aussagen seines Chatbots haften" (judgment of 12 May 2026, 4 UKI 3/25, not final), 2026.
- [81] The Motley Fool, trivago Q2 2026 earnings call transcript, 11 Aug 2026.
- [82] HOTREC and HES-SO Valais-Wallis, "European Hotel Distribution Study 2024" (reference year 2023), 2024.
- [83] Sitter, N., "Hotel Schema.org adoption study 2026", Mar 2026, updated Jun 2026. Vendor study.
- [84] htr.ch, "Sichtbarkeit wird zur neuen Währung im Hotelvertrieb", 2026.
- [85] maxonline, agency website ("GEO-Agentur DACH"), Wayback capture 8 Jun 2026.
- [86] SiteMinder, "Hotel Booking Trends 2026", 2026.
- [87] Booking Holdings, DMA compliance report 2025, Nov 2025.
- [88] Klopach, B. and Pierri, N., "Broad and narrow parity agreements", working paper, 18 Jan 2026.
- [89] Nokumo, "How does AI recommend hotels? We tested 450 queries across 4 models", 2026.
- [90] Seera Group Holding, Q2 2026 Earnings Presentation, 13 Aug 2026.
- [91] Seera Group Holding, Investor Presentation Q1 2025, Jun 2025.
- [92] Seera Group Holding, Q2 2025 Earnings Presentation, 13 Aug 2025.
- [93] Fortune, Marriott International Q2 2026 earnings coverage, 2026.
- [94] Skift, "Skyscanner and Almosafer open ChatGPT apps in the Middle East", 13 Apr 2026.
- [95] GCC Secretariat General, Digital Library, 2025 listing including the "Guiding Manual on the Ethics of Artificial Intelligence".
- [96] Law Library of Congress, "FALQs: AI regulations in the GCC member states, part one", Dec 2024.
- [97] K&L Gates, "Update: UAE consumer protection and e-commerce laws", 23 Jan 2024.
- [98] SDAIA, "Guide to the Saudi Personal Data Protection Law for controllers and processors".
- [99] Qatar Central Bank, "Artificial Intelligence Guideline", Sep 2024.
- [100] The Daily Tribune (Bahrain), "AI regulation bill faces pushback as Bahrain eyes practical alternatives", 23 Nov 2024.
- [101] Law Library of Congress, "FALQs: AI regulations in the GCC member states, part two", Dec 2024.
- [102] UN Tourism, CME/52/CR, Conclusions and Recommendations of the Commission for the Middle East (Kuwait), 10 Feb 2026.
- [103] Accor, half-year 2026 results, press release, 2026.
- [104] Google Search Central, "AI features and your website", updated 10 Dec 2025.
- [105] Ahrefs, "We tracked 1,885 pages adding schema. AI citations barely moved", 11 May 2026.
- [106] Mirai, "MCP, the bridge that will allow hotels to compete in the era of AI assistants and LLMs", 2026.
- [107] searchVIU, "Schema markup and AI in 2025: what ChatGPT, Claude, Perplexity and Gemini really see", 2 Dec 2025.
- [108] Google for Developers, Hotel Content, "Lodging Format schema", updated 9 Jul 2025.
- [109] eHotelier, "Inside ChatGPT ads: real performance data for hotel advertisers", 20 Aug 2026.
- [110] Amadeus, "Standards, not sentences: agentic AI in travel, MCP and UCP", 2026.
- [111] Adobe Digital Insights, "AI travel traffic surges as visibility lags", 2026.
- [112] TheLetterTwo, "Adobe: AI travel traffic up, visibility gap, July 2026", 21 Aug 2026.
- [113] Hospitality.today, "The AI booking scare runs on a number that isn't about hotels", 2026.
- [114] Expedia Group, "The Path to Purchase: US", 2023 report series.
- [115] SparkToro, "In 2026, less than one third of Google searches still send a click", 2026.
- [116] Google for Developers, Travel Partner API release notes and REST reference, 2024–2025.
- [117] Barceló Hotel Group, Executive Summary 2025, 2026.
- [118] Hosteltur, "Barceló Hotel Group ante 2026: IA, canal digital y expansión selectiva", 29 Apr 2026.
- [119] Similarweb, "Zero-click marketing", 2026.
- [120] Google, "A message from our CEO: Alphabet Q2 2026 earnings", 2026.
- [121] Phocuswright, "The trust economy: how European travelers decide who to believe", 2026.
- [122] Alphabet, second quarter 2026 results, Jul 2026.
- [123] Allouah, A. et al., "What is your AI agent buying?", arXiv 2508.02630, 2025.
- [124] Regulation (EU) 2024/1028 on data collection and sharing relating to short-term accommodation rental services, EUR-Lex, 11 Apr 2024. Art. 3(1), Recital 8.
- [125] Google for Developers, Hotel Prices, "Hotel price structured data reference", updated 28 Aug 2026.
- [126] European Commission, DMA Review Report, COM(2026) 178, 28 Apr 2026.
- [127] European Commission, "Commission provides guidance to Google for AI interoperability on Android and sharing of Google Search data under the DMA", 16 Jul 2026.



If one finding in this briefing changes a line in your 2027 budget, that is the conversation worth having.

Cross-Point works with hotel owners, asset managers and operators on decisions where the evidence is thin and the money is real: distribution cost, brand and operator fees, and how AI changes what to measure. The first step is a 30-minute conversation about what these findings mean for your properties. No deck, no pitch; bring your fee schedule and your last quarter's channel report.

Book the 30-minute conversation: riccardo.giacometti@cross-point.ch

Riccardo Giacometti spent more than thirty years in senior luxury-hotel leadership before founding Cross-Point. He writes and advises on hospitality strategy, AI adoption and decision architecture.

Riccardo Giacometti

Cross-Point

Riccardo Giacometti GmbH

Zug, Switzerland

riccardo.giacometti@cross-point.ch

LinkedIn: Riccardo Giacometti

This briefing is free to share in full. Quote the figures with their units and sources.

Edition 1 · Research cutoff 26 September 2026 · A refreshed edition follows the Q3 2026 disclosures and the January 2027 DSA milestones.