

**Question for written answer E-003506/2026
to the Commission**
Rule 144
Christine Anderson (ESN)

Subject: Regulatory perimeter of ChatGPT's designation as a very large online search engine

Following the designation of ChatGPT as a very large online search engine (VLOSE), questions arise as to how Articles 34 and 35 of the Digital Services Act (DSA) apply where the designated online search functionality and non-search conversational functionality rely on shared technical systems.

1. Where an algorithmic system, model, memory or personalisation system is shared between the designated online search service and a functionality falling outside that service, does Article 34 DSA require an assessment of risks attributable to its use only within the designated service, and what legal criterion does the Commission use to establish that attribution?
2. Could mitigation measures under Article 35 DSA require changes to such a shared model or system whereby those changes necessarily also alter non-search functionality outside the designated service? if so, what limits prevent Article 35 from indirectly regulating that non-designated functionality?
3. Can the fact that an algorithmic system is technically shared with the designated VLOSE, by itself, bring risks arising exclusively from its use in non-designated functionality within Articles 34 and 35 DSA, and the Commission is asked to answer yes or no and to identify the legal basis for its answer.

Submitted: 4.9.2026