From: Andy Cowan

**Sent:** 06 February 2022 13:15 **To:** Mobile Ecosystems

**Subject:** Mobile Market Ecosystems

Categories: [SharePoint] This message was saved in 'Mobile Ecosystems > Documents > Parties

> Individuals and Public > Andy Cowan'

## Hello

This response is regarding competition in the supply of mobile browsers and contains no information that could be considered confidential.

I have read your interim report, and would comment:

- I am a contract web developer, working in e-commerce and also run a business building internet payments solutions.
- As such I am extremely focussed in my work upon security, keeping consumer's and businesses money and data safe
- Apple require all browsers on IOS to be effectively reskinned versions of its own browser engine, WebKit. This means that when a security vulnerability is discovered in WebKit, it affects all browsers on IOS equally. Recently, WebKit was discovered to have a serious security flaw that remained unfixed for 58 days. Not only was Apple totally opaque about this, as a professional, I was unable to recommend an alternative browser to by clients and consumers. Any alternative on IOS would have contained the same vulnerability. On MacOs, for example, I could have recommended an alternative, keeping their data safe.
- Apple's browser updates (for security vulnerabilities) tend to be rolled out to users as operating systems
  updates. These are necessarily infrequent, meaning that Apple rarely releases urgent fixes for its WebKit
  engine. Alternative browsers could be released as App updates via the App Store, which happens much more
  frequently.
- Because Apple ties its updates to infrequent operating system updates, it lags behind other browsers on other
  platforms in terms of functionality. I am unable to recommend an alternative browser that contains the latest
  functionality because all browsers on IOS use WebKit.
- One particular technology, Progressive Web Apps, or PWAs, in particular is being strangled by Apple and not included in any meaningful way in IOS. Because they control the browser in IOS, by mandating the use of WebKit by competitors, PWAs are not available in IOS. The only logical inference to draw is that this is because they see the ability of users to install 'apps' directly to the device Home Screen via the browser as a threat to their App Store model. This reduces customer choice and the ability of developers to offer apps without paying Apple. The argument that this is for security reasons is laughable but a more complex explanation is required that can be provided here.

I'm afraid that most consumers have no idea that this is a problem - they see different browsers available in the App Store, and faced with a publicised issue with Safari, for example, may well switch to Chrome and think they are safe. They are not, and Apple do not make this clear to them. This is deceptive, and wrong.

Kind regards
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Andy Cowan

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Andy Cown