

From: Kimberly Blessing [REDACTED]
Sent: 07 February 2022 15:52
To: Mobile Ecosystems
Subject: Response to Mobile Ecosystems Market Study

To whom it may concern:

I am a UK resident and a 25+ year veteran in the field of Web development. I currently work as the Head of Technology for Dog Digital Ltd, a digital agency based in Glasgow which provides Web development services to companies throughout the UK and Europe. The following viewpoint is my own and not that of my employer.

Throughout my career, I have worked with companies all over the world to build Web sites which provide maximum benefit to the user while managing the costs of delivery and operation. For over a decade, Apple's business practices as related to their Safari/WebKit web browser and iOS app ecosystem have negatively impacted most companies' abilities to bring those things into balance.

From a business perspective, developing Web products is more costly because of Apple's practices. Their Safari browser lags behind other software products, both in terms of unresolved bugs [1] and support for common features available on other platforms [2]. The bugs can mean that significant time is spent by developers in the creation, debugging, and ongoing support of Web sites in order to make them work on Safari. This places an unfair burden on independent developers and agencies to keep up with the state of Safari issues and features. Those who don't carefully price their projects or word their contracts can lose money in these situations, because the businesses which employ them expect developers to know how to resolve or work around these issues.

The lack of support for common features in Safari forces businesses and developers to confront difficult questions about user value and build approach. Sometimes an organization will build a product knowing that iOS users may not have full access; while distressing that some users will be left out, it's ultimately a business decision. Other times, the approach is to build a separate native iOS application. This is a heavy-handed and costly approach; building and maintaining two separate software products instead of one incurs double or more the cost. In addition, because of Apple's gatekeeping policies regarding their app store, there is the risk that the iOS app will never be seen by users, or could be removed at any time.

Forcing businesses and developers to build iOS apps puts the Web at risk. Considerable investment in the Web industry has gone into the definition and creation of APIs to establish a platform for building Progressive Web Applications; as a technologist, I am eager to put them to use. Unfortunately, Apple's lack of support can make the business case for implementing PWAs a difficult one. This is reducing business opportunity for consultants and agencies like the one I work at.

Apple's users, meanwhile, are forced to endure the impact of all these business decisions. When the WebKit browser engine, which must be used by all browsers running on Apple iOS devices [3], had a bug which was leaking users' personal data, users had no alternative Web browser to turn to for protection. While users of non-Apple devices may be able to load a Web site to perform a particular transaction, Apple users may be left browsing the app store for software to allow them to perform the same. Although I am not an iOS device user, I do provide assistance to people who use them regularly, and it's often a frustrating experience to explain why things work (or don't work) as they do.

Because of the market penetration of Apple's products, their browser can't simply be ignored or left unsupported, as this would only frustrate and endanger users and damage a business's reputation. However the products brought to market by Apple are incomplete and not in the public's best interest, and Apple deserves to be held to account for this. I applaud the CMA's findings to date [4] and support Strategic Market Status regulation by the proposed Digital Markets Unit of Apple's iOS and Safari business practices. As an advocate for an open web, I would like to see the SMS require Apple to allow for true browser choice by removing its requirement that all browsers leverage the

WebKit engine on iOS, and prescribe that their App Store approval process expedite the addition of alternatives so that we might see diversity in iOS before the end of the calendar year 2022. This change must be free and unrestricted; any other browser and its underlying engine and APIs must be granted the same level of operating system access and permissions as WebKit/Safari.

Apple has long touted its products as the best; let's see if the market agrees when we have feature parity with other platforms.

Thank you,

Kimberly Blessing

(Permission granted to use my name)

[1] For example, https://www.theregister.com/2021/06/16/apple_safari_indexeddb_bug

[2] See <https://infrequently.org/2021/04/progress-delayed/#ios-lag>

[3] See section 2.5.6 of <https://developer.apple.com/app-store/review/guidelines/>

[4] <https://www.gov.uk/cma-cases/mobile-ecosystems-market-study>