

From: HTML5test [REDACTED]
Sent: 07 February 2022 11:52
To: Mobile Ecosystems
Subject: Comments about the Interim report on Mobile ecosystems

Dear sirs,

I am writing to you as a Dutch citizen. As I am CTO of a company that is doing business in the United Kingdom, I'd like to voice my opinion on the matter of web browsers and mobile ecosystems.

I am internationally recognized as an expert on browsers and web standards, and created the html5test.com website to measure how well browsers support web standards. I am an international speaker on browsers, compatibility and new web standards. Over the past several years, I was invited to speak at conferences in the United Kingdom numerous times.

Due to the rules of the App Store that Apple has set, it is not allowed to use browser engines other than the system provided one. I believe this hurts consumers and developers on several levels:

It hurts both consumers and developers because a lack of competition means a decreased incentive for Apple to improve their browser, fix bugs and support new features such as Progressive Web Apps. By allowing alternative browsers engines, Apple would need to compete with other browsers on capability. I believe this would force Apple to invest more in their own browser and browser engine.

It also hurts consumers because having all browsers use the same browser engine is a possible security risk. If the system provided browser engine contains a security flaw, all users of that platform are vulnerable. If there are more browser engines, only a percentage of users are affected, and affected users can choose to use a different browser engine until their browser of choice is fixed. A recent example of this is the IndexedDB vulnerability which affected all browsers and was only fixed after Apple fixed their system provided browser engine. In fact, Apple was made aware of this problem in November 2021, and it took until late January 2022 to fix this, and only after the issue was made public.

It also hurts consumers and developers because Apple's own browser is very opinionated. Safari will never support some web standards. This is, of course, perfectly fine. Browsers can choose which features they want to support. But it hurts consumers and developers when the choices one browser makes affect all browsers on a platform. When Apple decides not to support a feature in their browser, it is not available in any browser on their platform. Other browsers no longer have an option to support that feature.

Finally, I would like to bring the following articles I wrote to your attention which explain my position on this matter in much more detail:

<https://nielsleenheer.com/articles/2021/chrome-is-the-new-safari-and-so-are-edge-and-firefox/>

<https://nielsleenheer.com/articles/2021/hardware-and-the-web-the-balance-between-usefulness-security-and-privacy/>

To summarize, in my opinion, Apple should not be allowed to restrict browser engine choice on iOS. App Store rule 2.5.6 should be dropped, and users should be allowed to choose a browser that supports an alternative rendering engine.

Thank you for considering my position.

