

From: Alasdair King [REDACTED]
Sent: 19 July 2022 19:58
To: BrowsersAndCloud
Subject: Mobile browsers and cloud gaming

Dear CMA,

I have developed assistive technology - software for people with disabilities, such as blind people - for twenty years. I write in a personal capacity. I note with some concern that accessibility is being used as an argument to support the opening up of the iOS ecosystem: specifically, that Apple should be required to allow third-party applications and browsers and systems on their locked-down iOS system.

This is disingenuous. The advantage of the locked-down nature of iOS is that it is consistent and under greater user control. Apple can mandate that all applications work a certain way, and their assistive technology tools can then work with the applications more effectively.

For example, a blind person using the VoiceOver program to make their iPhone talk will only ever encounter web content on iOS displayed by the Safari engine because Apple forbids all other browser engines on iOS (for example, Google Chrome). That means that VoiceOver can do a better job than (say) a similar program on Android or Windows because the web content is consistently presented: if a button is always a button then VoiceOver can always say "button" and the blind user can use the webpage. If a different browser engine comes along and displays something that looks like a button but is, under the hood, something quite different, then the blind VoiceOver user might hear not "button" but "picture" or "link" or nothing at all. The consistency of iOS is beneficial to assistive technology and assistive technology users with disabilities.

Over the last twenty years many (perhaps most) users have moved to reliable, locked-down iOS from more open platforms like Windows, which they would not have done if the locked-down iOS was inferior. Android, of course, provides a much less locked-down environment, and excellent Android hardware is available: but hardly any of it is used in assistive technology (outside dedicated hardware) because having a more open environment in no ways assists disabled people. But it does mean that the market has provided a more open alternative: if a more open alternative was better for people with disabilities then Android might have been the leading platform for people with disabilities - but it is not better, and locked-down iOS has remained the leading platform for people with disabilities.

With no market failure (more open alternatives are available, but not popular) and no good engineering benefits (a more consistent platform is better for people with disabilities who use assistive technologies) I fear the only reason to open the iOS platform up is to allow developers and competitors to save time and effort by no longer having to support iOS-specific technology. Which is a perfectly good argument for competitors and software developers, but is a poor argument for happy iOS users with disabilities who will find their ability to use their devices degraded if it becomes more open.

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Dr. Alasdair King,
[REDACTED]