

From: Alistair Shepherd [REDACTED]
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To: BrowsersAndCloud
Subject: In response to CMA's Mobile browsers and cloud gaming MIR consultation

In response to Competition and Markets Authority's Mobile browsers and cloud gaming MIR consultation

I am a Front End Web Developer resident in the UK, working for the London-based web agency Series Eight. This response is my personal concerns and comments rather than the position of any of my clients or employers, past or present. Series Eight is a website design and development agency that builds award-winning eCommerce and marketing websites for companies and brands within the UK. As a web developer at Series Eight I work with browsers and websites extensively and my comments come from my experience developing a large number of websites and web apps.

I have previously submitted my experiences and thoughts—specifically in relation to the monopoly of the Webkit browser engine on Apple's iOS—as a response to the Competition and Markets Authority's Mobile ecosystems market study. My response is available here: [https://assets.publishing.service.gov.uk/media/622773fbd3bf7f1581a6eace/Developer - Alistair_Shepherd.pdf](https://assets.publishing.service.gov.uk/media/622773fbd3bf7f1581a6eace/Developer_-_Alistair_Shepherd.pdf)

In my previous response I specifically focus on the difficulties I and other developers face due to the lack of browser competition on iOS. Safari is a competent browser but in my experience has a large number of bugs and quirks that are difficult to deal with, and cost me and companies I have worked for a significant amount of time on every project to diagnose and fix. This cost is passed on to the companies and clients I work with, and due to a lack of any competition within the browser space on iOS Apple has little motivation to address these issues. In fact, due to the money Apple makes from native app development, their motivation may be in making web development more challenging on iOS to stifle a competitor platform.

As raised in the CMA's Mobile ecosystems market study, Google also engages in and exploits their entrenched mobile browser monopoly on Android. By utilising their position as the dominant browser, search engine, mobile operating system and email provider, Google is able to ignore the interests of consumers in mobile browser in favour of their own interests. This comes in the form of Google products requiring or 'suggesting' the use of Google Chrome to increase their browser market share, and features and functionalities added to Chrome to support their business interests elsewhere including in Search and Advertising, at the cost of consumer interests like privacy.

Despite Android supporting browser engine diversity and choice on paper, other browsers do not face the same preferential treatment as Google Chrome. Many Google apps will ignore the default browser and instead use Chrome, some APIs and functionalities are only available in Chrome, and features like Progressive Web Apps and Trusted Web Apps in some cases require Google Chrome.

I have spent hours diagnosing issues with websites to find the user reporting them was not aware that Google Search had ignored their default browser and their normal settings were not available, and development of PWAs and TWAs are more challenging when cross-browser development is not possible.

The inability to compete with native apps using Progressive Web Apps fully—particularly on iOS—also has a big impact on my work and the businesses I have worked with. Progressive Web Apps are extremely accessible for development, allowing for the creation of a simple app in a fraction of the time and complexity of a native app. This is fantastic for allowing smaller agencies and businesses to innovate on the web and on mobile devices and to reach consumers. However the poor support for PWA features by Safari and by not allowing them in the App Store, Apple forces app development to be difficult, time consuming and extremely expensive. I have spoken with many companies who would have liked an app to compete with their larger competitors but are unable to afford the huge costs in developing a native app.

I consider the analysis of the features of concern and the reference tests in regards to mobile browsers is correct and accurately reflects my experiences and concerns. Mobile browsers are a key part of participation in modern society and the market being fair and competitive for consumers is vital.

I believe that the opening of mobile browsers will be an almost universal benefit. As we have seen in the industry of web browsers in the past during the mid-2000's for Internet Explorer, a monopoly without reasonable competitor browsers causes progress and standards in web development to fall and negatively impacts developers and consumers significantly. By opening this up consumers can make meaningful choices to respect their preferences towards certain features, companies and privacy. Developers will be able to rely on more competitive browser engines prioritising bugs, security and interoperability. In this manner I believe it will also benefit Safari and Chrome, motivating their teams to push for further improvement and innovation.

I broadly agree with the remedies presenting by the CMA in the Mobile browsers and cloud gaming MIR consultation in regards to mobile browsers. I think that removing Apple's restrictions on browser engine diversity and mandating equal functionality for browsers is extremely important to restore competition in the mobile browser ecosystem.

In regards to the suggestion for requiring choice screens, I don't believe that they would be an effective or required remedy. I am not

sure they are particularly effective at preventing users from choosing the default browser, and it simply moves the goalposts on what browsers are allowed to 'compete'. When Microsoft implemented a browser choice screen in Windows I saw it pose more confusion to users than help. I am of the belief that a market where all other things are equal besides pre-installation solves the issue without the need for choice screens. I believe that the prevalence of Chrome on MacOS and Windows devices show that good browsers can easily overcome pre-installation.

An additional remedy I think is important to improving competition of mobile devices is in regards to ensuring PWAs are treated equally to native apps. I believe that Apple particularly should be required to allow PWA submission to their App Store so PWAs can compete effectively with native apps. In my experience this would significantly open up access to app development to a huge number of developers and businesses that could not afford native app development or the management of multiple platforms.

It is also extremely important that browser choice is always respected, especially when alternative browsers are available. Google, Apple, and third-parties including Meta are known to ignore default browser choice in some circumstances. A requirement for diversity is not effective when apps can ignore a user's preference, so I think it is important that platforms and apps be required to respect the default browser as a potential additional remedy.

I believe the remedies as proposed and I have mentioned would be sufficient and effective at allowing for competition in mobile browsers and in addressing the entrenched market power of Apple and Google in the mobile browser ecosystem. I have less experience with the cloud gaming industry, however as a consumer the concerns and proposed remedies do seem accurate and appropriate to ensure competition in this area.

My comments are of a personal capacity and do not represent any organisation I work for. I would like my response to be attributed to me by name, and you have my permission to publish or quote from this document with or without attribution.

Best regards,
Alistair Shepherd

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Alistair Shepherd
Developer, [SeriesEight](#)
(he/him)