

From: Jesper van den Ende [REDACTED]
Sent: 25 June 2022 19:50
To: BrowsersAndCloud
Subject: Response to consultation

Hello,

I'm Jesper van den Ende, I represent Pelican Party Studios and Jesper the End B.V. Though I also work on web applications in my free time, for the sake of simplicity you can consider this a response from a business.

Last time I submitted a response to the mobile ecosystems market study interim report. And I'd like to take the opportunity to do the same for the current consultation.

1) Do you consider that our analysis is correct with respect to the suspected features of concern in the supply of mobile browsers and cloud gaming in the UK?

I wasn't able to find any incorrect information.

2) Do you consider that our analysis is correct with respect to the reference test being met in relation to the supply of mobile browsers and cloud gaming in the UK?

I can't comment on the specific requirements for the reference test, but the information regarding mobile browsers seems correct.

3) Do you agree with our proposal to exercise the CMA's discretion to make a reference in relation to the supply of mobile browsers and cloud gaming in the UK?

Yes.

4) Do you consider that the proposed scope of the reference, as set out in the draft terms of the reference published alongside this document, would be sufficient to enable any adverse effect on competition (or any resulting or likely detrimental effects on customers) caused by the features referred to above to be effectively and comprehensively remedied?

One part I think might be missing from the draft terms is the distribution of web apps, specifically installing them to the users home screen.

I'm not sure if mentioning "mobile browsers" in the draft terms already covers this case, but if not I think it could be beneficial to mention this as well.

5) Do you have any views on our current thinking on the types of remedies that a MIR could consider (see above and Chapter 8 of the market study final report)? Are there other measures we should consider?

I strongly agree that making third party browsers available on iOS would be very beneficial for both developers and consumers. This is because of the several reasons others and me have mentioned in previous responses.

However, and I touched on this briefly in the answer to the previous question, one important measure that I think is missing is enforcing installable web apps.

The report mentions that certain APIs should be made available to third party browsers. And I suppose this could cover installable web apps in a way. But I'd like to explain a little further why specifically this set of functionality is especially important to us.

One of the issues we usually face is that most of our users have a certain expectation that apps need to be downloaded via the app store.

No matter how good browser engines get, if users are not aware that they can install a web app to their device like they can with app stores, they will most likely keep using apps the way they do right now.

Any remedies taken wouldn't reach their full potential unless users also start using their browser like they use their app store apps.

If you consider that Safari has always had a very obscure way to install websites to the home screen (compared to Chrome on Android), this will most likely stay this way unless measures are taken on this front as well.

I have a strong belief that if the current set of measures is taken, browser functionality will certainly improve. However, Apple will always have an incentive to make it as easy as possible for users to install apps from their store, and as difficult as possible to install web apps.

That is why banners for app store apps on iOS have always looked like this: <https://i.imgur.com/NXSLBt3.png>

And since iOS 14 support has been added to even make them look like this: <https://i.imgur.com/72ztWNE.png>

All the while installing web apps is still a 3 step process: <https://i.imgur.com/LjKQKp1.png> (4 steps if you account for having to scroll down to make the 'Add to home screen' button visible).

For comparison, installing web apps with Chrome on Android looks like this: <https://i.imgur.com/7iOTim8.png>

I'm worried that with the discussed measures, Apple will keep this install flow as difficult as it currently is. Which is fine for their own browser, Safari. But I am fairly certain that without any extra measures Apple will ensure that any third party browser apps will not be able to create installable web apps.

This is important to us because to this day we are still getting responses from our users that they wish to have our websites available as an app in the app store. When I ask them why they prefer this over the website they often reply that it is easier to find this way.

This shows that users have a certain expectation on how to install apps. As long as this expectation exists, fully switching to web app development exclusively will not be an option for us. We would still have to put in extra time and effort in the development and publishing of our app to the app stores this way. Otherwise we might be missing out on potential users.

6) Do you have any views on areas where we should undertake further analysis or gather further evidence as part of an MIR in relation to the supply of mobile browsers and cloud gaming?

I think the current report covers all of the important topics.

I hope this helps.

If you have any further questions, please don't hesitate to contact me.

Best regards,
Jesper van den Ende