

Gener8's supplemental response to the CMA's statement of issues in relation to mobile browsers and cloud gaming

Introduction

Gener8 submitted a response to the market investigation's Issues Statement in January 2023. We are writing to confirm that the evidence and views we submitted twelve months ago remain equally relevant today. This supplemental submission reiterates our main areas of concern within the mobile browser sector, while also drawing your attention to some relevant market developments during the elapsed time.

Gener8 continues to offer our full support for tough action through this market investigation. Despite the delay, the investigation can still deliver transformative change before the CMA's new *ex ante* Digital Markets Regime comes into full force.

Recap of Gener8's interests in the market investigation

Gener8 approaches the issues within your investigation's scope from the following perspectives:

- We are a UK-based tech start-up with a suite of products that includes a desktop browser built using the Blink rendering engine. Due to Apple's WebKit restriction, it is not technically possible to ship our browser for iOS devices, and it does not currently make sense to ship a product that is only accessible by up to half the market.
- We have browser extensions for Chrome, Firefox and Edge on desktop devices that offer a similar experience to using the full Gener8 browser. However, Google does not allow extensions to Chrome on Android, and Apple restricts extensions to rival browsers on iOS. It is therefore not currently commercially viable to ship browser extensions on mobile.
- Our mobile data management app interacts with Safari on mobile through a browser extension, enabling our iOS users to seamlessly access and earn from their browsing data. We are unable to duplicate this popular feature for our Android users due to Google's extension restriction.
- We urge the CMA to lift these various anticompetitive restrictions to open up the mobile browser market (of which extensions are a critical feature) to full and open competition, to support innovation and choice for UK disruptors and consumers alike.
- Although we do not currently have a presence in the mobile browser market, we have a strong interest in all potential remedy designs (including choice screens), both as a potential future entrant, and for their potential application to our existing desktop products in the future.
- Through our own browser, and the consented data we access through our app, we have an in-depth understanding of how people use browsers on different devices. For

example, in relation to pages visited, time spent browsing, value of purchases made through the browser, and time spent using the browser vs other apps.

- We do not have any insights in relation to distribution of cloud gaming.

In principle, Gener8 is supportive of all outcomes and interventions that create a more level playing field, where competition and innovation within the online ecosystem can flourish. That is certainly not the case for mobile web today, regardless of device manufacturer or operating system provider.

Developments for mobile browser extensions

It is now almost 15 years since Google enabled extensions by default for developers on Chrome, starting initially with a modest 1500 extensions. Today, there are reportedly over 180,000 extensions on the Chrome Web Store.

There has been vast technological development in that intervening period. The smartphones that people carry around in their pockets today are more powerful than the desktop devices that people were using back in 2009. It is astonishing that Google has not managed to replicate the full Chrome experience for its users on Android mobile devices after all this time.

As we outlined in more detail in our previous submission, browser extensions support innovation in three important ways. First, they are a low-cost route of entry for new competing browser vendors. This was the route in for some of the existing smaller rivals to Apple, Google and Microsoft that operate today. Second, extensions enhance the features and functionality that are available to browser users, improving the experience and possibilities for consumers when browsing the web. In this sense the quality, availability and range of extensions is a source of potential differentiation in the supply web browsers. Third, just like web apps, browser extensions are another alternative distribution channel to native apps as a way for developers to reach consumers with innovative new services.

Twelve months on from our previous submission, we have observed no progress from Google with respect to Chrome extensions for Android. In fact, to this day, we are not aware that Google has made any public statements about this unusual asymmetry within in its suite of products. Encouragingly, the rest of the market has been moving forwards.

As we noted previously, Apple does now support extensions to Safari on iOS. The contrast between Apple and Google is particularly striking, given the conclusions that the CMA previously reached when comparing the pace of development between Google and Apple towards their respective browser technology. With browser extensions identified by the CMA's Mobile Ecosystems Market Study as an example of capabilities that Apple unfairly restricts for rival browsers on iOS, we assume that the market investigation is already considering interventions to enable universal access to extensions within the iOS ecosystem. The equivalent outcome is needed for the Android ecosystem.

Apple is not the only major browser vendor that recognises the importance of extensions for a modern web experience. Mozilla's Firefox has long supported and championed the value that extensions can offer, reporting to the CMA's Mobile Ecosystems Market Study that the capabilities to have extensions is very important for Firefox users. It is therefore no surprise that Mozilla recently announced the deployment of extensions for Firefox on Android.¹

Samsung and Microsoft are also hot on Mozilla's heels with the pursuit of mobile browser extensions:

- Samsung Internet has an extensions development programme, which is currently in a closed beta phase.²
- Microsoft is reportedly building support for extensions to Edge on Android, with speculation that public testing will start in the coming months.³

Given that both these browsers are powered by the Blink rendering engine, it is likely that Microsoft and Samsung are (or will be) making contributions to the Chromium project's open-source code. As well as demonstrating proof of concept for browser extensions on Android, they may also be doing some of the heavy lifting for Google in the process.

Some might look at this situation and say this is a matter for the market to solve. If browser extensions really are an important source of differentiation and innovation that improves user experience, then Google will surely respond and replicate or improve upon those efforts from rival browser vendors. But such an assessment would be flawed. As the CMA rightly concluded in its Mobile Ecosystems Market Study, Google's Chrome browser has substantial market power within the Android ecosystem, meaning that it does not face adequate competition to constrain its behaviour. In other words, Google does not need to respond to rivals and introduce browser extensions, as it knows the vast majority of Android users will continue to use Chrome anyway.

After almost fifteen years of inaction on this issue, it is clear that Google will only introduce extensions to Chrome on mobile once it is forced to do so. The CMA is best placed to take the lead on this issue on a global basis, just as it has done so already with this in-depth market investigation into mobile browsers and cloud gaming.

Required action

We again urge the CMA to add an additional theory of harm to the scope of its market investigation in relation to Google's extension restriction on mobile. Specifically, we propose that the CMA formally adds the following question to its list of theories of harm to be the focus of the market investigation into mobile browsers and cloud gaming:

¹ [Open extensions on Firefox for Android debut December 14.](#)

² [Samsung Internet extension development guide.](#)

³ [Microsoft Edge for Android is getting support for extensions.](#)

- Whether Google is restricting the use of browser extensions in a way that is weakening the threat of entry from rival browser vendors, and/or holding back innovation relating to the functionality of mobile browsers.

We hope that the CMA's market investigation can swiftly probe with Google why extensions on mobile have yet to be supported. It is clear that this is having **a material adverse effect on competition that must be remedied by mandating support for extensions to Chrome on Android.**

We trust that this issue will be explored within a working paper in the coming months, in order to establish the facts, and to obtain views and evidence from a broader range of affected stakeholders (e.g. browser extension providers and browser vendors), particularly as this issue has not been publicly consulted on to date. We consider this information gathering exercise to be a minimum procedural requirement for all potential competition concerns in scope of the investigation, whether or not an AEC is found or remedies are taken forward.