

RESPONSE TO ISSUES STATEMENT

CCIA response to public cloud infrastructure services market investigation competitive landscape working paper

We wanted to write and express our concern over the CMA's in our view inappropriate statement in its working paper on the competitive landscape in cloud, that it does not "consider that it is appropriate to place any evidential weight on" a Public First survey commissioned by our organisation.

The CMA cites three arguments for that view:

- CMA responds to a claim that the survey shows that "cloud services providers, including AWS, face significant competitive pressure from on-premises providers" and this includes that, of those that have switched from a provider, 29% have switched to on-premises solutions. CMA argues that it is not clear what kind of switching this captured. While there may be important distinctions, and this is an interesting area for further investigation, whether a customer considers those services a "cloud infrastructure provider" (the term used in the relevant question) may speak more to their own view of the options available to meet their ICT infrastructure needs (whether those technical distinctions are meaningful).
- The CMA claims the sampling and methodology of the survey is not clear. In sending our submission to the enquiry, CCIA offered further engagement, suggesting follow up on "any topics where you would appreciate further evidence." The survey results including detailed crosstabs are <u>available online</u> with the normal accompanying information. Public First is a member of the British Polling Council and therefore follows the normal rules intended to ensure best practice in research exercises of this kind.
- The CMA points to the survey having been funded by CCIA, which has Amazon and Google as two of its members. Indeed, we mentioned in our submission that we have "multiple members competing vigorously in the cloud sector" with "diverse views on the issues raised in the issues statement for the Cloud Services Market Investigation." It is entirely common, indeed a part of the point of a consultation process, for submissions to this kind of investigation to come from organisations that have a more-or-less direct connection to the sector. External evidence has a valuable role in mitigating the risk of confirmation bias, as a regulator considers evidence gathered by organisations with diverse interests and analytical priors. Excluding evidence in part because it comes from a membership organisation seems likely to weaken the quality of the analysis available to support CMA investigations over time.

We understand that the CMA needs to take a rigorous approach in its assessment of the evidence available and we would not expect any one research output to be decisive. However, we believe that placing no evidentiary weight on the survey is inappropriate. We would urge you to reconsider this in your final analysis and remain keen to help answer any questions you have about this and other research that CCIA has commissioned around the cloud sector.