APPLE'S RESPONSE TO CMA WORKING PAPER 6

Cloud gaming services: nature of competition and requirements for native apps on mobile devices

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Apple responds below to the CMA's emerging thinking on cloud gaming as set out in Working Paper 6. As Apple has explained to the CMA and as this response details, cloud gaming is fully supported on iOS. Cloud gaming is not disadvantaged in comparison to other app types under Apple's App Review Guidelines and developers can and do offer cloud streaming games on iPhone.

A. Cloud gaming enjoys robust support on iOS

1. As a device manufacturer, Apple is incentivized to encourage developers to offer a variety of games on iOS devices so that users can find and play the games they want. Otherwise, Apple risks users choosing a different device that offers the games they demand. Apple has therefore consistently supported gaming in all forms on iOS. As a result, games have proliferated on iOS, with the App Store offering hundreds of thousands of diverse game apps today.

2. Cloud gaming is just one of many ways developers offer games on iOS. Other game formats include games that are downloaded and available for local play on the iPhone, as well as games available via remote play through connection to a console or other device.

3. The evidence before the CMA demonstrates that cloud gaming has been supported on iOS for years. As shown below, cloud gaming, like other types of gaming apps, benefits from Apple's investments in hardware and software, as well as its efforts to ensure that the iOS platform provides an attractive home for gaming apps, whether that be in the form of a native iOS app or a web app.

1. Cloud Gaming Apps Benefit from Apple's Investments and Developments

4. Apple has continually invested in hardware and software improvements that benefit games offered on iOS, including cloud gaming apps.

5. Many cloud gaming apps utilize very sophisticated graphics and game play modes (such as multiplayer game mode) for their core functionality. Playing these games requires a high-quality display, immediate and precise touch or other input recognition, high-quality haptic and motion feedback, and reliable battery life, all supported by high-performance hardware and software tools, as well as a consistent, high-bandwidth internet connection.

6. Thus, gaming apps generally, and cloud gaming apps specifically, benefit significantly from Apple's investments in hardware, software tools, and developer support, such as the following:

   - *Super Retina XDR display*: Industry-leading OLED display, including wide color (P3) support, up to 120Hz refresh rate, 2,000,000 contrast ratio, 1000 nits max brightness and 2000 nits peak brightness.[1]
   - *Apple Silicon*: Powerful and highly efficient custom systems-on-a-chip helping to deliver all-day battery life, including up to 25 hours of video streaming playback and 95 hours of audio playback.

[1] https://www.apple.com/iphone-15-pro/specs/.

- *Sensors and Haptics*: Including a high dynamic range gyroscope, high-g accelerometer, and custom Taptic Engine for high-quality haptic feedback.[2]

- *AV1 Support*: A dedicated AV1 decoder to support high-quality video streaming for cloud gaming and other video content services.[3]

- *Game Controller Application Programming Interface (API) Support*: APIs allowing high-quality haptic feedback from input devices like wireless controllers for games,[4] including cloud gaming services deployed via web apps.[5]

- *High-quality Audio*: Support for lossless and spatial audio experiences to provide high-fidelity and immersive audio gaming experiences.[6]

- *Developer Support*: Including analytics and performance metrics available via App Store Connect; as well as app discovery assistance through the Games and Apps Tab, editorial curation and highlights, marketing guidance and promotion.[7]

- *Engagement Through Multiple Fora*: Including: (i) regular workshops, events, and consultations hosted at Apple Developer Centers worldwide;[8] (ii) Worldwide Developers Conferences featuring live and recorded video sessions and labs;[9] (iii) beta software allowing developers to engage with pre-release software and provide feedback through a dedicated forum, Feedback Assistant;[10] (iv) online engagement via Apple Developer Forums;[11] (v) developer documentation on latest sample code, articles, tutorials, and APIs;[12] (vi) developer design videos;[13] (vii) the Worldwide Developer Relations team; (viii) dedicated business management teams; and (ix) correspondence with the App Review team during review of an app submission.

- *App Store Developer and Distribution Tools*: Including: (i) custom product pages, which allows developers to publish additional versions of their App Store product pages highlighting certain features or content from their apps;[14] (ii) offering apps and games for pre-order so that users can order the app before it is released, and then the app is automatically downloaded on the day it is released;[15] (iii) in-app events, which allow developers to showcase events within their apps like game competitions directly on the App Store;[16] (iv) product page optimizations, which allows developers to test up to three alternate product pages against their original product page to find the best performing version;[17] and, (v) universal purchase, which lets users purchase developers related iOS, iPadOS, macOS, tvOS, and visionOS apps together on the App Store[18].

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2 https://www.apple.com/iphone-15-pro/specs/.
3 https://webkit.org/blog/14445/webkit-features-in-safari-17-0/.
4 https://developer.apple.com/documentation/gamecontroller/.
5 https://webkit.org/blog/14445/webkit-features-in-safari-17-0/.
6 https://developer.apple.com/news/?id=fakg1z5b.
7 A recent example of support provided to streaming game app developers is the work that Apple did to help Antstream launch on iOS. See paragraph 20 for further details.
8 https://developer.apple.com/events/.
9 *See, e.g.*, https://developer.apple.com/wwdc24/.
10 https://beta.apple.com/.
11 https://developer.apple.com/forums/.
12 https://developer.apple.com/documentation/.
13 https://developer.apple.com/videos/design/.
14 https://developer.apple.com/app-store/custom-product-pages/.
15 https://developer.apple.com/app-store/pre-orders/.
16 https://developer.apple.com/app-store/in-app-events/.
17 https://developer.apple.com/app-store/product-page-optimization/.
18 https://developer.apple.com/help/glossary/universal-purchase/.

7. Apple has continued making improvements for game developers, including the following announcements just this year:

   - With iOS 18, Apple announced Game Mode to provide a more immersive gaming experience with minimized background activity to sustain higher frame rates, as well as decreased input and audio latency.[19]
   - Apple introduced the latest version of Gaming Porting Toolkit, which makes it easier than ever for developers to port Windows games to iOS 18 (via macOS).[20]
   - Following the January 2024 change to the App Store Review Guidelines to remove the requirement for a separate binary and product page for each game, Apple further expanded the categories of streaming apps permitted by Guideline 4.7 to include retro game emulators in April 2024.

8. As cloud gaming benefits from all of the above, such investments and continued enhancements run entirely contrary to the CMA's working theory that Apple is incentivized to limit the success of cloud gaming apps on iOS.

2. Apple Supports Cloud Gaming via Web Apps

9. Contrary to the emerging conclusions set out in Working Paper 6,[21] web apps offer a viable option for developers to provide their games on iOS. Developers have taken advantage of the flexibility of offering their catalog of games as a web app or native apps, and have found success with both. For example, Xbox Cloud Gaming, Nvidia GeForce Now, and Amazon Luna successfully offer a variety of games, including AAA titles, via web apps.

10. Other developers choose to offer versions of their games as both web apps and native apps. For example, Electronic Arts offers some of its games as native apps on the App Store, whilst others are available via a web app (such as the Need for Speed Heat game available on Xbox Cloud Gaming).[22] Similarly, Konami offers versions of its Castlevania game as native apps on iOS and in the Amazon Luna web app. Ubisoft offers different iterations of its Assassin's Creed game as a native iOS app and in Xbox Cloud Gaming, and Capcom/Niantic offer different iterations of the Monster hunter game as native iOS apps and in Xbox cloud gaming. Many of these games are also available on consoles, just as Epic Games offers its Fortnite game for multiple platforms: console, handheld, and remote play on handheld devices through both Amazon Luna and Xbox Cloud Gaming.

11. Developers have found success with their web app offerings. NVIDIA has praised the web app functionality on iOS devices and has reported "lots of positive feedback" from the gaming community for its web-based GeForce Now cloud gaming service."[23] GeForceNow's Director of Project Management has also stated that "*the GeForce Now service [feels] extremely responsive, and one cannot detect any lag between the inputs and the character[']s onscreen actions*."[24]

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19 https://developer.apple.com/videos/play/wwdc2024/101/.
20 https://developer.apple.com/games/game-porting-toolkit/.
21 *See, e.g.,* Working Paper 6, paragraph 3.14.
22 https://apps.apple.com/us/developer/electronic-arts/id284800461.
23 *Epic* Trial Testimony of Aashish Patel 471:25-472:2 (05/05/2021); *see also Epic* Trial Exhibit DX-3815.001 (email from Fredrik Liljegren to Tim Sweeny noting Nvidia had "overwhelming positive response from the community across the globe").
24 *Epic* Trial Testimony of Aashish Patel 469:5–13.

12. Similarly, Microsoft has offered its Xbox cloud gaming service via web app on iOS for approximately three years.[25] Since releasing performance enhancements to the Xbox Cloud Gaming web app on iOS, Microsoft announced a "significant increase in positive player feedback" and "35% longer play times."[26] Xbox Cloud Gaming is a thriving service, with Microsoft reporting that 20 million people have streamed games using Xbox Cloud Gaming, a roughly 100% increase in less than 7 months.[27]

13. The Working Paper cites general concerns regarding support for cloud gaming services via web apps. These concerns are outdated,[28] are contradicted by the evidence of developer investment in web apps and their successes, reflect inherent challenges posed by the nature of cloud gaming (not specific to web apps on iOS),[29] and lack sufficient clarity to facilitate a cogent response[30].

B. Apple's changes to the App Review Guidelines further strengthen Apple's support for cloud gaming

14. The App Review Guidelines (Guidelines) have continued to evolve to respond to and support cloud gaming developers who want to provide native cloud gaming apps on iOS, while still preserving Apple's core user experience and guarantees of privacy and security.

15. A brief review of the history of the Guidelines pertinent to cloud gaming demonstrates Apple's ongoing commitment to cloud gaming:

    - In June 2017, Apple introduced the original Guideline 4.7. Among other purposes, Guideline 4.7 was intended to codify the opportunity for developers to extend an app's functionality by offering HTML5 mini-programs, or mini-games that could be accessed directly within a web browser without the need for third-party plugins from inside their native iOS apps. This provided a clear path to offer app functionality that is not included in the app binary.

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25 https://www.theverge.com/2022/3/15/22979290/microsoft-xbox-cloud-gaming-ios-ipad-performance-improvements.

26 Nicole Hilbert and Akshar Pandia, Available Now: Performance Improvements for iPhone and iPad on Xbox Cloud Gaming, Microsoft (Mar. 14, 2022), https://news.xbox.com/en-us/2022/03/14/available-now-performance-improvements-for-iphone-and-ipad-on-xbox-cloud-gaming/; https://www.theverge.com/2022/3/15/22979290/microsoft-xbox-cloud-gaming-ios-ipad-performance-improvements

27 Tom Warren, Microsoft Says More Tan 20 Million People Have Used Xbox Cloud Gaming, The Verge (Oct. 25, 2022), https://www.theverge.com/2022/10/25/23423668/microsoft-xbox-cloud-gaming-20-million-people-streamed.

28 Indeed, the Working Paper acknowledges that a least some of NVIDIA's raised concerns already have been addressed in iOS 14.3. (Working Paper 6, paragraph 3.14(c)). Other examples include the complaint that a "party's web app was unable to send push notifications to users' home screens or lock screens, because WebKit did not support this. Again, that concern is no longer valid. iOS 16.4 added support for Web Push to Home Screen web apps, which can be used to send push notifications to users

29 For example, Epic Games raised concerns that the "infrastructure (servers, availability of server space, etc.) required for streaming apps to reach a similar scale as a native app running on a user's device may prove both technically and financially inefficient or prohibitive." (Working Paper 6, paragraph 3.15). These concerns would arise with a cloud gaming experience on any platform, not just with web apps on iOS. As Epic itself noted, these concerns are specific to offering streaming games versus a native app *running on a user's device*.

30 Working Paper 6, paragraph 3.14(d). This anonymous complaint suggests that the WebKit requirement impedes cloud gaming. The basis for that complaint is not clear from the cited statements; the Working Paper simply notes that the mobile browser is not perceived as being a "sufficiently viable alternative to reaching users that prefer cloud-based gameplay on a native app". But the web app offerings available on iOS (including those highlighted in paragraphs 11 and 12 above) demonstrate the fallacy of even these vague complaints.

- In September 2020, Apple introduced former Guideline 4.9 to codify Apple's longstanding approach to allow streaming games. Through Guideline 4.9, Apple made clear that developers could offer cloud gaming services that aggregate multiple games under a single subscription and make those games accessible through a catalogue app. The catalogue app facilitated access to the games in the service, and each game retained its own discoverable Product Page that could be accessed from the catalogue app.

- In January 2024, Apple further revised the Guidelines to remove Guideline 4.9 and amend Guideline 4.7. Guideline 4.7 today allows cloud gaming services to offer multiple games within a single app, removing the previous requirement that streaming games be submitted as separate binaries. Guideline 4.7 also codifies various guardrails for submitting cloud gaming apps that preserve the safe and secure experience users expect, including, for example, ensuring that developers do not share data with any individual software offered in their app without explicit user consent.[31]

- In April 2024, Apple further expanded the scope of Guideline 4.7 to include retro game console emulator apps, which can allow users to download games.

- On August 1, 2024, Apple further expanded the scope of Guideline 4.7 to include PC emulator apps, which can also allow users to download games.

19. These changes demonstrate Apple's long-standing commitment to supporting cloud gaming apps on iOS. Apple amended the Guidelines in view of developer feedback that the single binary requirement was proving challenging to their ability to provide cloud gaming apps. New Guideline 4.7 also builds on Apple's experience with cloud gaming apps submitted under previous Guideline 4.9, including which guardrails to codify in the revised Guideline.

20. Since the changes to the Guidelines, Apple has had active engagement with multiple developers interested in offering cloud gaming apps on the App Store. Antstream, for example, has worked with Apple to build its single binary app with a catalogue of over 1300 games to stream.[32] As the Working Paper acknowledges, Antstream has had a positive experience engaging with Apple to bring its cloud gaming service to iOS as a native app.[33] To support Antstream, Apple carried out extensive commerce work, including StoreKit integration code review and setup and testing of Antstream's introductory offer; helped Antstream with its subscription optimization, including paywall reviews against best practices and product page reviews; developed an editorial framework to support game streaming services; and provided public relations review and guidance on Antstream's launch announcement.

21. Apple has also had active engagement with other app developers, including with one developer that has had cloud gaming native apps on the App Store since before the January 2024 Guideline amendments,[34] but is now exploring the possibility of a single binary app with

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31 Guidelines 4.7.2 to 4.7.5 provide necessary and proportionate guardrails for cloud gaming apps. Guideline 4.7.2, for example, provides that a game streaming app may not extend or expose native platform APIs without prior permission from Apple. This is intended to prevent a host app developer from providing API access (which could include sensitive data such as a user's photos or access to the user's camera) to the various entities offering software (e.g., games) in the host app. Similarly, Guideline 4.7.2 prevents a host app from asking the end use for permission to access location data and then share that location data with the software offered in the app. This Guideline thereby provides necessary security and privacy protection, to ensure that a user knows which data and other features are being accessed by an app and to avoid expanding the attack surface by creating new access points to a user's data and device features with a multi-game app.

32 Apple_Confidential Annex_CMA_MI_0042 sets out correspondence with Antstream on bringing cloud gaming to App Store with new Guideline 4.7.

33 Working Paper 6, 4.39.

34 S*ee, e.g.,* Apple's 20 January 2023 Response to Q1 of s174-2.

a catalogue of apps. Apple has also had continued engagement with some of the largest cloud gaming service providers in an effort to bring their offerings to the App Store.

22. The Working Paper indicates that one cloud gaming service provider appears to have uncertainty about how Apple will apply its Guidelines, and perhaps Guideline 4.7 in particular.[35] This does not accord with Apple's experience, which has been that developers understand the recent changes to Guideline 4.7 and that Guideline 4.7 provides a clear path for developers who want to offer multiple streaming games through a single app without using multiple binaries. Since announcing the changes to Guideline 4.7, Apple has received very little feedback expressing concern or confusion.

23. More generally, it is Apple's experience that developers know the many options they have to reach out to Apple with any questions, concerns, or need for help in developing their apps. As noted above at paragraph 6, Apple provides multiple routes for developer contacts.

24. As the above makes clear, Apple is excited about the opportunity to bring more cloud gaming apps to iOS and to provide users with new ways to game on its devices. But despite Apple's efforts to engage with developers, cloud gaming apps (and the potential growth of the cloud gaming market more generally) continue to face challenges across all platforms.[36] These derive from well-known challenges, including latency, networking problems, and server capacity that have nothing to do with Apple's policies or Guidelines.[37]

C. Cloud gaming apps (like other apps) must comply with the App Review Guidelines

24. Cloud gaming is supported on iOS today, as demonstrated by the cloud gaming offerings currently available via web apps and/or native apps. The games available on cloud gaming services range from AAA games with complex graphics and multiplayer gameplay to single player games with very simple graphics and less reliance on device resources. The reality of these extensive offerings confirms that any technical challenges to providing cloud gaming on iOS have effectively been addressed, whether by amendments to the App Review Guidelines, Apple's ongoing expansion of features for web apps, or Apple's overall continuing improvement of its products.

25. In light of this, the complaints identified by the CMA in the Working Paper are predominantly from cloud gaming service providers that do not want to be subject to the remaining Guidelines. But there is no principled reason why cloud gaming apps should be treated differently from all other apps on the App Store.

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35 Working Paper 6, paragraph 4.7.

36 Multiple complainants in the Working Paper acknowledged the technical challenges that may impact the growth of cloud gaming, especially on mobile devices. For example, Microsoft noted that network quality and consistency and bandwidth of internet connection could impact the deployment of cloud gaming on mobile devices. Working Paper 6, paragraph 2.26. An unnamed third party also said that the growth of cloud gaming would depend on overcoming technical limitations like the availability of low-latency internet connectivity and continued improvement in cloud graphics processing unit capabilities. Working Paper 6, paragraph 2.25(b). Moreover, Amazon admitted that while cloud gaming held potential for continued innovation and development, it is still nascent. Working Paper 6, paragraph 2.25(a).

37 *A*s the CMA stated in its Final Report regarding Microsoft's acquisition of Activision, third-party evidence concerning the challenges with respect to cloud gaming include *"[cloud gaming] has not yet reached mass adoption, with one of the main reasons being that it can still be associated with 'lag' or latency*." CMA Final Report into the Anticipated acquisition by Microsoft of Activision Blizzard, Inc (April 2023), at paragraph 8.50. According to Microsoft, "*[c]loud gaming is small and uncertain to succeed. It a new and immature technology which faces significant challenges*." Microsoft's Response to the CMA's Issues Statement in the Microsoft/Activision merger inquiry, at paragraph 1.11.

1. IAP concerns are commercial, not technical

26. The primary concern identified by the CMA is not a technical issue, but instead a commercial one—the requirement to use Apple's In-App Payment ("IAP") functionality for the purchase of digital goods and services. This issue is notably raised by very large developers, some of which are well known for their commercial disputes with Apple more generally.

27. Apple applies the IAP requirement uniformly to all apps for any purchases of digital goods and services.[38] There is no basis for treating cloud gaming apps differently from other apps, even if the developer of the cloud gaming app sources some or all of the games from other developers. As Apple has explained, it is a long-standing principle of the App Store, and Apple's relationship with developers, that developers are responsible for the content and features of their apps even if third parties contribute to that content.

28. IAP also offers significant benefits for users, including users of cloud gaming apps. For example, customers get receipts of all purchases made through IAP. This is especially important for gaming apps, where dark patterns can often induce users into unintended purchases.[39] IAP also makes it easy for users to keep track of and cancel subscriptions. There is no reason why users of cloud gaming apps should not be entitled to these and many other benefits of IAP.

29. There is nothing unusual about Apple's approach to payment for cloud gaming services. It is common for games to include a payment framework adapted to the platform on which the game is being offered, whether that platform is a console (like Xbox or the Sony PlayStation) or a mobile device (like the iPhone or an Android smartphone).[40] Moreover, many cloud gaming services—including Microsoft's Xbox Cloud Gaming web app—utilize a subscription payment service, which could facilitate any coding work needed to implement IAP in a cloud gaming service. Other games such as Minecraft offer digital currency and content purchases through both Internet and platform mechanisms.[41] With respect to Minecraft, for example, a user can access Minecoins (Minecraft's virtual currency) which are tied to a consumer's Minecraft account, so a user's Minecoins can be used across different devices. This shows that the IAP requirement does not impose on unreasonable burden on developers, nor is it unusually burdensome for developers to adapt to different payment requirements across platforms.

30. IAP in the context of cloud gaming does not create an impediment to bringing such services to iOS devices. Based on complaints from developers like Microsoft, the Working Paper suggests that it could be prohibitive to recode apps to incorporate an IAP requirement. This suggestion, however, has little evidentiary support in the Working Paper or elsewhere. And cloud gaming providers have raised very few concerns with Apple about IAP. It is notable that while CMA cites Microsoft's concerns in the Working Paper, Microsoft has chosen not to engage with Apple on cloud gaming apps since Apple's changes to the Guideline. This lack of engagement comes despite Apple's affirmative outreach on new opportunities and tools for cloud gaming apps on iOS.

31. Instead, Apple's experience is that developers generally are not having difficulty with the IAP requirement. Indeed, Antstream, a small app developer, did not raise concerns about incorporating IAP during its discussions with Apple to develop its own native cloud streaming app, which uses IAP to arrange for monthly or yearly subscription purchases. Large

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38 *See* App Review Guideline 3.1.1.

39 https://www.ftc.gov/news-events/news/press-releases/2023/03/ftc-finalizes-order-requiring-fortnite-maker-epic-games-pay-245-million-tricking-users-making.

40 https://developer.samsung.com/galaxy-games/faq.html ("Also, for in-app purchases, games submitted to Galaxy Store must use Samsung IAP.")

41 https://www.fortnite.com/vbuckscard?lang=en-US.

developers are similarly able to incorporate IAP. For example, NetEase, with a market cap of $59.46 billion, offers multiple apps on the App Store that incorporate the use of IAP.[42]

32. In addition to cloud gaming apps, other apps that offer certain third-party software that is not embedded in the binary under Guideline 4.7, such as HTML5 mini-programs, have been able to successfully implement IAP. For example, the Telegram and Facebook apps have implemented IAP for their HTML5 mini-programs. This further undermines the notion that IAP poses an insurmountable technical challenge that effectively bans native cloud gaming apps on the App Store.

33. Apple is also making it even easier for developers, including cloud gaming developers, to support IAP for large and complex content libraries available in their apps. With Advanced Commerce APIs, which were announced in 2024, Apple offers developers, who meet the relevant criteria, enhanced tools to handle large and complex SKU counts within an app, beyond what is currently supported by App Store Connect. In effect, the Advanced Commerce APIs allow apps, including cloud gaming apps, to more easily integrate monetization across large catalogs of content or a large number of SKUs.

34. Finally, the Working Paper fails to give due account to the ability for cloud gaming apps, like other gaming apps, to benefit from the "Multiplatform Rule" which enables users to access content, subscriptions, or features that have been acquired elsewhere and to use that content, subscription, or feature (including consumable items) in the gaming app. Critically, developers who sell digital content and subscriptions on their web sites for users to access in the app pay no commission to Apple on such sales. The Multiplatform Rule provides developers with considerable flexibility in terms of monetization—flexibility that the CMA does not take into account in its analysis.

35. As the above shows, Apple's IAP requirement does not provide a barrier to cloud gaming, is consistent with the approach of other platform providers, and ensures consistency of approach between cloud gaming apps and other apps on iOS. Apple is also continuing to support cloud gaming developers (and other developers that come within Guideline 4.7) in their efforts to monetize their apps and is proactively addressing issues that may arise in practice.

2. The Reader Rule does not apply to cloud gaming apps

36. The Working Paper also focuses on the "Reader Rule" which was designed and intended for apps that allow a user to access previously purchased content or content subscriptions for a specific set of app-types: magazines, newspapers, books, audio, music, and video. As Apple has explained, and as the Guideline 3.1.3(a) makes clear on its face, the Reader Rule does not (and was never intended to) cover content such as streaming games. Nor would it be appropriate to do so, given the different nature of such apps. As such, Apple has never approved a gaming app to take advantage of the Reader Rule. The fact that the Reader Rule does not apply to cloud gaming, therefore, is not a sufficient reason to call into question Apple's approach to IAP in the context of cloud gaming.

D. Conclusion

37. As the above sections show, Apple supports and encourages the presence and growth of cloud gaming services on iOS. Indeed, it is in Apple's interest to offer a wide variety of options to its users, consistent with its commitment to provide a great user experience. Developments such as amendments to the Guidelines and Apple's investment in continued technological advances, as well as the introduction of new cloud gaming apps from developers like Antstream, clearly show the expansion and evolution of cloud gaming on iOS. Cloud gaming

[42] https://apps.apple.com/kg/developer/netease-interactive-entertainment-pte-ltd/id1485225410.

services, including apps from various complainants noted in the Working Paper, have been successful on iOS as both web apps and native apps. This investigation began with the premise that there may be an effective ban on cloud gaming services on iOS. That has been demonstrably disproven. Apple therefore requests that the CMA revisit the emerging thinking in its Working Paper.

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