

From: [REDACTED]

To: BrowsersAndCloud <[browsersandcloud@cma.gov.uk](mailto:browsersandcloud@cma.gov.uk)>; [REDACTED]  
[REDACTED]

Subject: RE: Mobile browsers and cloud gaming MI - Working paper responses - [REDACTED]

Dear [REDACTED] –

[REDACTED] agrees with the CMA’s analysis in Working Papers 1 to 3, including its identification of distinct markets for (i) each of browsers and browser engines, (ii) each of mobile browsers and mobile app stores, and (iii) each of mobile browsers on iOS and mobile browsers on Android.

The CMA could strengthen its findings by defining and undertaking a more detailed analysis of the markets for iOS and Android browser engines, including addressing the conflation of browser engine and browser market shares in paras. 4.6 to 4.20 (with the exception of para. 4.10) in Working Paper 1. This would provide a framework for considering how the “upstream” markets for browser engines work, including the challenges faced by web app developer, enabling the CMA to set out more completely the impact of the WebKit restriction that Apple imposes on the markets for web applications and browsers. As intermediate markets in which demand-side dynamics are driven by developers (rather than end users), it is important that these dynamics not be conflated with those of the downstream markets considered in the Working Papers (where the demand-side dynamics are driven by end users). Further, while the Working Papers provide some analysis of the differences between browser engines (Appendix A of Working Paper 2), and correctly identify many of the harms resulting from Apple’s WebKit requirement (e.g. it decreases competition between browsers and constrains the ability of browser developers to innovate and develop new browser functionality), it is crucial to not understate the fact that the requirement forces browser developers to recode browser apps for iOS (where those apps can be built on a single alternative browser engine for all other platforms).

Finally, [REDACTED] agrees with the CMA’s conclusion that Apple’s WebKit restriction decreases competition between browsers. However, it notes that the CMA’s analysis of the parameters of competition identified (namely security, privacy, performance and innovation) appear to reflect Apple’s efforts to misdirect away from the impact of its anti-competitive conduct, by focusing attention on incorrect claims about security and privacy, rather than capturing the full set of competitive parameters.

Beyond this (and its response to [REDACTED]), [REDACTED] does not think it has anything to add to the WPs.

[REDACTED]