

Dear Browser & Cloud Team,

This is a remarkable overview of the challenges faced by browser vendors and users alike when it comes to switching their defaults - thank you for taking the time to fully understand the multiple hurdles and handicaps faced by competing providers. We fully support the CMA taking action to address all of the concerns laid out in this piece of research, by:

1. **Mandating choice screens**, so that users get to pick their preferred default browser
 1. via a prompt to all existing users and at new device onboarding thereafter, as well as at the event of major OS updates, e.g. annually.
 2. well designed, free of charge, non-skippable, with tag lines and logos, one click download, forced scroll, prominent placement of chosen app, dual-use apps permitted, transparent data source, live API reporting and fully randomized ordering save that SMS firms should always be below the fold.
2. [Redacted]
3. **Limiting the ability of incumbents to push their own browsers, for instance by banning the Google "App Switcher" prompt on iOS and ensuring SMS firms do not circumvent choice screens by prompting users who moved away from their services shortly after showing the choice screens, and allowing for the full uninstallation of SMS apps e.g. Chrome.**
4. **Making sure the new chosen default fully replaces the incumbent's browser as default, without degrading functionality on the device.**
 1. [Redacted]
5. [Redacted] on Android, the pre-installed home screen search bar's default is impossible to change and can only be entirely replaced by the user, which is a cumbersome process. This additional, hard-to-change access point drives Chrome/Google Search app usage. There are other access points on Android that are subject to the Google agreements with OEMs and are as a result impossible or hard to change, like the web component of on-device search. The general rule is that they should all be easily switchable to an alternative, including via a centralized setting that competing search and browser apps can guide users to.
6. Additionally, the section on the link between search and browsing should stress that:
 1. browsers almost entirely monetize via search, as stressed in the mobile ecosystems study (MEMS).
 2. most non-gatekeeper search apps are dual use search/browser.
 3. search access points typically open a browser and are therefore relevant to the analysis.

[Redacted] The figures confirm that to help achieve contestability, choice screens need to be shown to all existing users, which has been the case on non-Android Chrome and on iOS, but

not on Android. Choice screens should be shown periodically (at the event of major OS updates), be well designed and impact all access points.