

**[Company A] – Response to the CMA’s Invitation to Comment in the Strategic Market Status Investigation into Apple’s mobile ecosystem, dated 23 January 2025 (the “ITC”)**

**February 19, 2025**

[Company A] welcomes the CMA’s SMS Investigation into Apple’s mobile ecosystem (the “**SMS Investigation**”) and hereby provides its initial views on the SMS Investigation.

[Company A] requests that this submission, including [COMPANY A] identity and any identifying information contained herein be treated as strictly confidential, as disclosure would likely severely harm [COMPANY A] legitimate business interests.

**Introduction of [COMPANY A]**

[REDACTED]

**Q1: Do you have any views on the scope of our investigations and descriptions of Apple’s and Google’s mobile ecosystem digital activities?**

[COMPANY A] fully supports the proposed SMS designation of Apple and the description of Apple’s mobile ecosystem and its control over the main gateways to its ecosystem.

Apple has become a dominant player in the supply of mobile devices, in particular in advanced high-performance smartphones, and it holds an entrenched position in the digital space with its mobile ecosystem, including its mobile devices (in particular, the iPhone), its mobile operating system iOS, its mobile browser Safari, its app store and other connected devices (e.g. Apple Watch).

The control of this mobile proprietary ecosystem allows Apple to command high prices and margins, and results in consumer lock-in, also because of the high switching costs. Once users have invested significant amounts in Apple’s ecosystem, switching to a different handset and platform would be costly and inconvenient. Apple also create a user experience which disincentivizes users accustomed to iOS from switching to other platforms. This in turn reinforces Apple’s market position in its ecosystem and consumer lock-in effects. The CMA has widely assessed the serious concerns of consumers’ lock-in to Apple’s ecosystem, including in its market study into mobile ecosystems<sup>1</sup>.

**Q2: Do you have any submissions or evidence related to the avenues of investigation set out in paragraph 70-72? Are there other issues we should take into account, and if so why?**

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<sup>1</sup> CMA’s market study into mobile ecosystems<sup>1</sup> ([here](#)).

[COMPANY A] would like to draw the CMA's attention to Apple dominance at other levels of the mobile devices' supply chain and in particular [REDACTED]<sup>2</sup>, which are in turn essential for the development of its flagship mobile devices. [REDACTED]. With its entrenched market position in the development of flagship smartphones, Apple has also become [REDACTED].

[REDACTED]<sup>3</sup>.

[REDACTED]

**Q4: Which potential interventions should the CMA focus on in mobile ecosystems? Please identify any concerns relating to Apple's or Google's mobile ecosystems, together with evidence of the scale and/or likelihood of the harms to your business; or to consumers.**

[COMPANY A] invites the CMA to also consider and focus on Apple's conduct in [REDACTED].

There is ample evidence of Apple's conduct and its detrimental effects, not merely on [COMPANY A] business but more importantly on the overall cellular innovation industry and on the prejudice to innovation. [REDACTED].

[REDACTED]

[IMAGE REDACTED]

[IMAGE REDACTED]

Source: [REDACTED]

[REDACTED]<sup>4</sup>.

[REDACTED].

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<sup>2</sup> [REDACTED].

<sup>3</sup> For the avoidance of doubt, this response relates to Apple's market position as relevant for the CMA's ITC and to Apple's conduct from a competition law perspective [REDACTED].

<sup>4</sup> [REDACTED].

**Q5: Are the potential interventions set out above likely to be effective, proportionate and/or have benefits for businesses and consumers?**

[COMPANY A] respectfully submits that, in order to effectively protect the various stakeholders in the mobile supply chain, and ultimately final consumers who should be given access to the best available mobile technologies at accessible prices, the CMA's interventions should address concerns at the various levels of the supply chain, including by [REDACTED]. Such intervention would be proportionate, by restoring and safeguarding incentives of the main innovators [REDACTED] and more importantly result in significant benefits for mobile users. This intervention would also prevent Apple from further strengthening its dominance in its ecosystem as a first step to solve the serious concern of consumers' lock-in.

**Q6: What key lessons should the CMA draw from interventions being considered, imposed and/or implemented in relation to mobile ecosystems in other jurisdictions?**

In addition to encouraging the CMA to examine closely the Commission's non-compliance investigations into Apple under the Digital Markets Act, should the CMA be willing to investigate Apple's conduct in relation to [REDACTED] and their interlinks with Apple's dominance in its ecosystem and prejudice on mobile devices' users, [REDACTED].