

To: mobilesms@cma.gov.uk

12 February 2025

Dear Sir,

RE: Strategic Market Status Investigations into Apple's and Google's mobile ecosystems

The Online Dating and Discovery Association (ODDA) is the global voice for the sector with a mission to create a safe, responsible and enjoyable dating and social discovery experience for everyone.

We would like to thank the Competition and Markets Authority (CMA) for the opportunity to comment on the Strategic Market Status (SMS) investigations into Apple's and Google's mobile ecosystems.

The ODDA and its members welcome the scope of the investigations. We believe that the descriptions of Apple's and Google's mobile ecosystem digital activities are fair and an accurate reflection of the current environment.

We are pleased to see the list of potential interventions regarding exploitative practices. In our view, these practices have had a significant impact on consumer choice and severely limited innovation. Restrictive terms and conditions have undoubtedly favoured native apps at the expense of others. We also note the high commission rates that are charged by Apple and Google that can be particularly prohibitive for small firms and start-ups.

One area of focus we think the investigations should consider concerns the way refunds are processed through the Apple App Store and Google Play. Currently, decisions around refunds are made by the app stores with very little, if any, discussion with individual app developers. This means that refunds may be issued arbitrarily without any regard to the terms and conditions set by the app developer, which can often leave them out of pocket.

Finally, we would like to see the UK take a similar approach to the European Commission where Google and Apple are designated as 'gatekeepers' under the Digital Markets Act. This would be in keeping with the CMA's findings from its [2022 Mobile Ecosystems Market Study Final Report](#), where it concludes that "Apple and Google's control over their respective mobile ecosystems allows them to set the 'rules of the game' for app developers, who rely on their app stores to reach customers and have little or no ability to negotiate over terms."

In doing so, we hope to see the CMA appropriately scrutinise Apple and Google's 'bottleneck' practices, which encroach on the ability of developers to freely and fairly operate in the digital ecosystem. We hope that this will lead to a level-playing field where consumers have greater choice and innovation can flourish.

We welcome the opportunity to provide further information as part of the evidence gathering and stakeholder engagement phase.

Yours faithfully,

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Simon Newman
Chief Executive Officer