Strategic market status investigation into Apple's mobile platform

Roadmap of possible measures to improve competition in mobile ecosystems

23 July 2025

The Competition and Markets Authority has excluded from this published version of the provisional findings report information which it considers should be excluded having regard to the three considerations set out in section 244 of the Enterprise Act 2002 (specified information: considerations relevant to disclosure). The omissions are indicated by [✂]. Some numbers have been replaced by a range. These are shown in square brackets. Non-sensitive wording is also indicated in square brackets.

Contents

Page

1. Summary 3
2. Introduction and our approach 9
Apple's Mobile Platform and our strategic objective 11
The legal framework and our prioritisation approach 16
3. The Roadmap in respect of Apple's Mobile Platform 20
Category 1: Potential conduct requirements we will aim to begin consulting on from autumn 2025 23
Category 2: Measures we will consider from the first half of 2026 28
Category 3: Issues that we are not currently prioritising 37
Areas where we are still considering prioritisation, subject to international development 41
4. Next steps 43

1. Summary

1.1 Almost all adults in the UK currently have access to a mobile device[1] and almost all of these devices have a Mobile Platform provided by Apple or Google. Mobile devices with Apple's Mobile Platform have a [50-60%] share of supply, and those with Google's Mobile Platform, which also include devices made by Samsung and Motorola, have a [40-50%] share. Consumers use the mobile platform on their devices to access, view and engage with digital content and services – for example browse the internet, engage and communicate with friends on social networks, watch videos and play games.

1.2 Apple's Mobile Platform is therefore vital for hundreds of thousands of UK businesses distributing digital content and services to consumers on mobile devices.[2] The UK has a vibrant app developer community, representing Europe's largest app economy by revenue and app developer count. In total, the UK app economy generates an estimated 1.5% of the UK's GDP while supporting c.400,000 jobs across direct, indirect and other supporting functions.[3] It is therefore essential that this part of the digital economy works well, creating opportunities for all market participants, large and small, to invest, innovate and grow. And when this market works well in the UK, it creates more opportunities for UK app developers to compete globally.

1.3 More broadly, many UK businesses today use a native app as a key part of their digital offering – from transport to takeaways, retail, finance and fitness – these businesses range from large corporates to small start-ups across many different sectors of the economy. Some businesses distributing digital content and services may rely solely on native apps as their main channel to reach customers, without a website or physical store. This includes in key growth areas of the economy like gaming and FinTech, for example:

- The FinTech sector plays a positive role in contributing to UK growth, with over 76,000 jobs, over half of all UK unicorn companies (more than any

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[1] Mobile devices include smartphones and tablets. See UK Mobile Phone Statistics 2024 - Stats Report - Uswitch.

[2] In the UK in 2024, there were [1-2] million apps on the App Store, [0-1] million app developers distributing via the App Store and [20-30] million users downloaded a native app on the App Store. See Annex A: Market Outcomes (Apple), Table A.1.

[3] See The App Association's ITC response, page 3 and The App Economy in Europe – A review of the mobile app market and its contribution to the European Economy; GDP contribution includes direct economic impact (direct revenue earned by companies in the sector), impact due to spillover effects (the rise of M-commerce), and indirect impact (wealth beyond the companies in the app industry, including other productive sectors and households); jobs estimates cover direct jobs (software developers, mobile app specialists), indirect jobs (suppliers to the app developers) and induced jobs (jobs created by the spending of the direct and indirect jobs).

other sector), and more than £18bn of inward investment over the past 3 years.[4]

- The UK video games sector contributes £6bn of Gross Value Added annually and supports 73,000 jobs. Within this, mobile gaming is the fastest growing segment, with 34% of UK users playing games on mobile devices (up from 19% in 2016)[5] and spending nearly £2bn per year on mobile games.[6]

1.4 It is therefore essential for a wide range of UK businesses, and their customers, that competition works well in relation to Apple's Mobile Platform.[7] And where this is the case, this will be expected to deliver positive growth, investment and innovation opportunities for the UK economy as well as significant benefits to consumers, including in the form of cheaper, higher quality and/or innovative products and services.

1.5 On 23 January 2025 we began our 'SMS investigation' into whether to designate Apple as having SMS in respect of its Mobile Platform. We have now published our proposed decision.[8] Alongside, this Roadmap sets out how we propose to prioritise possible interventions, if we reach a final decision to designate Apple with SMS in its Mobile Platform.

1.6 The Roadmap is an indicative prioritisation document; it does not set out the evidence or reach a view on measures that should be put in place. Further work is needed to consider the issues, and to ensure any measure is an effective and proportionate response, in line with the statutory requirements. Rather, the Roadmap is intended to give more certainty to Apple and other market participants on our planned workstreams. It sets out the areas where we are currently considering taking action, as well as areas that we do not consider as priorities, during the first half of any designation period.

1.7 Our prioritisation has been informed by the CMA's prioritisation principles and the UK Government's strategic steer. We will focus on targeted interventions that improve market outcomes for consumers and businesses in the UK, also taking appropriate account of measures that have already been taken or are proposed internationally. Many international jurisdictions have taken, or are

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[4] See FinTech Investment Landscape 2023 and UK FinTech Retains Second Spot in Global Investment Rankings Amidst Tough Market Conditions

[5] See Mobile phone gaming penetration in the United Kingdom (UK) from 2009 to 2024 (Statista).

[6] See Press start on growth – Unlocking the full potential of the UK video games industry (May 2025), UKIE.

[7] In the SMS Proposed Decision in respect of Apple's mobile ecosystem, we provisionally concluded that the Smartphone Operating System, Tablet Operating System, Native App Distribution, and Mobile Browser and Browser Engine activities should be treated as a single digital activity, referred to as a Mobile Platform.

[8] SMS Proposed Decision in respect of Apple's mobile ecosystem.

taking, action to address concerns in relation to mobile ecosystems.[9] We are focused on learning from these experiences and ensuring that where these interventions are effective, UK consumers and businesses do not miss out on the opportunities. Further, we are also conscious of the consumer benefits that the existing mobile ecosystems already deliver to UK consumers and will consider these when designing any intervention.

1.8 The proposed measures set out in this Roadmap have an overarching goal of promoting greater competition such that UK app developers and innovators developing and distributing content via Apple's Mobile Platform are able to innovate and grow their businesses. This in turn delivers benefits for UK consumers in the form of more innovative and higher quality digital content and services on their mobile devices, facilitating greater choice at competitive prices, improving the overall consumer experience within the mobile ecosystem. The Roadmap sets out a phased approach for measures we may take in order to achieve this goal.

1.9 The main focus of our early priority interventions (Category 1)[10] is on **app distribution**. App developers looking to distribute their apps on iOS and iPadOS must distribute through Apple's app store, which means that Apple's App Store holds a monopoly over app distribution on Apple devices. Our starting point is to look at Apple's App Store terms and conditions, and the way these are operated. It is important that UK app developers are treated fairly and have sufficient certainty that they will continue to be able to serve their customers effectively. This will give them and others the confidence to invest and grow, without the risk of subsequent, potentially business-ending, changes by Apple. To that end, we expect that our immediate focus will be on a package of interventions to provide UK app developers with this increased certainty by requiring that Apple takes action in relation to:

- **App review:** Reviews apps to be distributed in its app store in a fair, objective and transparent manner;
- **Ranking of apps:** Ranks apps in its app store in a fair, objective and transparent manner; and

[9] We refer to broader activities carried out by Apple and Google, including mobile devices, their respective Mobile Platform, and content accessed via the Mobile Platform as Mobile Ecosystems.

[10] Category 1 interventions are potential CRs where we consider there is likely to be a strong case for intervention and where the CMA is well placed to act more quickly, accounting for the potential impact, strategic significance, resource and risk of intervening. We will prioritise immediate work on these potential interventions with the aim of beginning to consult on these following any final decision to designate Apple with SMS, from autumn 2025.

- **Data collected as part of app review:** Does not use data collected for the purposes of reviewing apps unfairly, such as for its own app development purposes.

1.10 We also want app developers to have access to their customers on fair terms, which enables them to deliver a wide range of services and content. We consider that enabling 'steering' such that app developers can steer consumers off the App Store, for example to complete transactions, is likely to be an effective way of delivering this and therefore currently intend to prioritise consideration of this (Category 1). While the design of any potential steering intervention will need careful consideration, one form of this intervention[11] already appears to be delivering positive benefits in the US. In a matter of weeks it resulted in changes such as app developers rolling out new and improved products, and announced price decreases for affected users.[12]

1.11 We also recognise the potential benefits of other measures in relation to app distribution, for example on promoting alternative in-app payment solutions, or alternatives to app distribution via the App Store. In considering which measures to prioritise we have considered a range of factors including their potential impact, alongside the likelihood of them being effective. Whilst these other measures could deliver potential benefits, these benefits are less likely to be immediate and there are complexities which make the likelihood of these measures being effective less certain.[13] Many of these measures are included within the Digital Markets Act (DMA) and the European Commission's recent enforcement action.[14] We will therefore keep broader measures in relation to app distribution under review, particularly considering lessons from international developments.

1.12 Our second key priority area of focus is on **interoperability** and ensuring app developers have interoperable access to key functionality within iOS and iPadOS. Without the ability to access these enabling functions, UK app developers cannot create the full range of innovative products and services that they would do otherwise, and UK consumers miss out as a result.

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[11] See Epic vs Apple judgment from Northern District of California granting Epic's motion, 30 April 2025.

[12] For example, see Following Landmark Court Ruling, Spotify Submits New App Update to Apple to Benefit U.S. Consumers — Spotify and "No Apple tax means we will lower prices" - Proton promises price drop after US ruling against Apple | TechRadar.

[13] For example, there are real challenges in overcoming the network effects inherent in app stores. These mean that an app store is more attractive to users the more apps it has, but also that an app store is more attractive to app developers the more users it has. Furthermore, any measures in relation to sideloading would need to carefully consider the security implications.

[14] See Commission closes investigation into Apple's user choice obligations and issues preliminary findings on rules for alternative apps under the Digital Markets Act - European Commission.

1.13 Our immediate focus in this area will be on considering improvements to the process by which app developers can request **interoperable access to key functionality** within Apple's mobile operating systems (Category 1). Whilst the aim would not be to create a default interoperability requirement, it would aim to ensure that Apple's decisions in respect of interoperability requests are fair, transparent and objective.[15]

1.14 We will then focus on enabling interoperable access for specific use cases where we consider app developers having access to particular functionality is likely to be particularly important in enabling innovation (Category 2).[16] Our key use cases are:

- **Digital wallets** where, until very recently, Apple Wallet was the only option allowed on iOS, and there is increasing focus on expanding payment options on mobile devices as well as emerging innovative uses such as for identity verification.[17] The UK is the top-ranking investment destination in Europe for FinTech and accounts for 11% of the global industry,[18] and so ensuring a pro-innovation environment makes this a key use case for us. The potential benefits are clear, since in the EU Apple has agreed commitments in this space,[19] which has resulted in innovative and competing offerings already being released.[20] It is important that UK developers and users have access to similar opportunities.

- **Connected devices**, where device manufacturers are dependent on being able to connect to, and interact with, Apple's mobile devices, with any restrictions having the potential to extend the boundaries of Apple's ecosystem into a wider range of products. The ability to access key

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[15] This objectively justified basis could include consideration of factors such as the demand for access to this feature or functionality, the engineering cost required to make necessary changes, user experience, or the introduction of excessive security risks.

[16] Category 2 interventions are potential CRs or PCIs on which we think there may be a case for action, but where issues require further consideration, and potential interventions may be more complex to develop. Subject to our further analysis, we will aim to consult (in the case of CRs) or launch investigations (in the case of PCIs) from the first half of 2026 onwards.

[17] For example, the UK Government has developed an app which uses NFC to verify the authenticity of certain physical identification documents. See Using the 'UK Immigration: ID Check' app - GOV.UK.

[18] See Fintech article great.gov.uk international.

[19] In the EU, Apple offers access to the NFC chip free of charge to third parties. It does this through the 'HCE' (Host Card Emulation) model. See Commission accepts commitments by Apple opening access to 'tap and go' technology on iPhones.

[20] For example, Vipps MobilePay launched an alternative to Apple Pay on iPhones in Norway, while PayPal announced its plans to launch a digital wallet in Germany with new benefits such as cashback offers and the option to spread payments. See Vipps MobilePay.

functionality on mobile devices is particularly important for UK healthtech and gaming companies.

1.15 We are also pursuing exploratory work to develop our understanding of both the choice architecture and the functionality likely to be particularly important to businesses developing apps utilising **AI services**, with a view to considering whether action is needed. These include apps like voice assistants and writing assistants. The rapid growth of AI provides a clear opportunity for innovation and investment in the UK, as reflected by the UK Government's AI Opportunities Action Plan,[21] and we want to ensure a level playing field and the best services being made available to UK mobile users.[22]

1.16 We will also consider the controls around **browser engines** (Category 2). The functionality available on a browser is developing rapidly with the advent of AI, with new releases seeking to integrate contextual queries (eg summarising text on a webpage) and even completing specific tasks online on your behalf.[23] We want to ensure that alternative browser providers can build such innovative propositions on Apple's mobile devices, and UK users can benefit from the full range of options available.

1.17 However, browsers on mobile devices are dependent on the functionality of the underlying browser engine, and on Apple mobile devices this is restricted to WebKit (Apple's own browser engine). This not only results in Apple policies potentially dictating the evolution of browser development, but limits the ability for competitive differentiation due to the commonalities of relying on a single browser engine. We are therefore prioritising **the requirement to use Apple's WebKit browser engine on iOS and iPadOS (the WebKit restriction)** and allowing alternative browser engines onto iOS and iPadOS, whilst ensuring that these alternatives are able to function effectively.

1.18 Finally, we are intending to prioritise furthering our understanding of **progressive web apps** (PWAs) and their potential competitive impact, including through additional stakeholder engagement, with a view to considering if measures are needed to enable their development. A PWA is an application that is built to provide digital content rendered by a browser engine, but is able to provide a user experience similar to a native mobile app (eg it works offline). PWAs could provide significant benefits to developers,

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[21] Government's AI Opportunities Action Plan, 13 January 2025.

[22] At WWDC 2025, Apple introduced the Foundation Models framework, which it states provides app developers with access to Apple's on-device large language model that powers Apple Intelligence; see Foundation Models | Apple Developer Documentation.

[23] For example, Opera recently announced Opera Neon, an 'agentic browser' designed to 'understand your intent, assist with tasks, and take actions'; see Opera Neon—A browser for the agentic web.

including reducing development costs by allowing for a single (browser-compliant) version (rather than building for different operating systems), and reducing reliance on native app distribution.

1.19 In forming our views on priority areas, we have necessarily deprioritised other areas (Category 3).[24] These include emerging areas like mobile network slicing, improved data transfer and switching APIs to enable users to more easily switch between iOS and Android ecosystems, and action in relation to Apple's privacy policies regarding advertising (including App Tracking Transparency or ATT). We may revisit the case for intervention in these areas as we update the Roadmap for the second half of the designation period, based on our analysis (and any relevant market developments) at that time.

1.20 Lastly, we have identified some possible measures where we will continue to consider our approach in light of progress in ongoing action in other jurisdictions over the coming months. These measures relate to alternative app distribution (as noted above), as well as to Apple's agreements with Google. This is in line with the CMA's prioritisation principles and the UK Government's recent strategic steer, which encourages us to consider where we are best placed to act.

1.21 In line with our participative approach, we will continue to engage with a broad range of stakeholders as we clarify our views on appropriate interventions over the next few months and will provide an updated version of the Roadmap in the first half of 2026. Should stakeholders have views on the Roadmap, they can be provided via email at mobileSMS@cma.gov.uk.

2. Introduction and our approach

2.1 Millions of UK consumers rely on Apple's Mobile Platform to access, view and engage with digital content and services on mobile devices, including for example to play games, watch videos, access social media, process payments or communicate. Almost all (94%) of 16+ year olds in the UK[25] – around 56 million UK consumers[26] – currently have access to a smartphone,[27] and Apple's share of supply in the UK in relation to smartphones has been

[24] Category 3 interventions are potential CRs or PCIs which we do not expect to pursue in the first half of Apple's SMS designation period.
[25] See Smartphone ownership by age 2012-2024 | Statista
[26] See United Kingdom (UK): number of smartphone users 2020-2029 | Statista
[27] See UK Mobile Phone Statistics 2024 - Stats Report - Uswitch.

[50-60%] each year since 2017 and in relation to tablets has been [50-60%] each year since 2017.[28]

2.2 To access the significant number of UK consumers with an Apple mobile device, app developers must develop and distribute their content via Apple's Mobile Platform. Ensuring competition works well in relation to Apple's Mobile Platform therefore has significant implications for the UK economy.

2.3 We want to ensure that UK app developers and innovators developing and distributing content via Apple's Mobile Platform are able to innovate and grow their businesses and in turn that UK consumers get broader choice, more innovative products, and lower prices.

2.4 During the course of our investigation so far, we have spoken to, or received information from, over 100 businesses of different sizes across the UK and internationally, including through consultation responses, requests for information, bilateral conversations, engagement with experts and other authorities, and an app developer workshop. A large number of parties have raised concerns around how Apple operates its Mobile Platform.

2.5 This Roadmap sets out how we intend to prioritise our work to deliver these outcomes through possible measures with respect to Apple's Mobile Platform under the digital markets competition regime, should Apple be designated as having Strategic Market Status (SMS). It is a proactive step we are taking, over and above our obligations under the Digital Markets, Competition and Consumers Act 2024 (the Act),[29] to provide additional clarity on the types of interventions we expect to consider and the expected timeframes for developing them.

2.6 The Roadmap aims to give clarity about the areas we would plan to focus on in the first half of any designation period. We would expect to provide an update to the Roadmap in the first half of 2026 to confirm our plans. This update will take into account developments in other jurisdictions, as well as views from stakeholders on our proposed plans.

2.7 Following this, we would intend to revisit the Roadmap at the start of the second half of the designation period, and may set out any further or different measures if we think they are necessary, based on our analysis (and any

[28] We provide further shares of supply, including for smartphones and tablets separately in Annex A: Market Outcomes (Apple); see Figure A.3.
[29] Digital Markets, Competition and Consumers Act 2024.

relevant market developments) at that time. For example, we may need to revisit our categorisation if:

- market circumstances change or new evidence of a concern emerges;
- Apple's conduct changes in a way which creates a need to consider whether any modifications may be appropriate, for example additional measures are needed, or measures are no longer necessary;
- there are developments in other jurisdictions that have implications for our interventions; or
- our interventions do not have the anticipated effect, and we consider that we need to take further or different action to address concerns.

2.8 More generally, we will keep our approach to interventions under review. If we receive compelling evidence for a change in our approach we will give it careful consideration.

2.9 The rest of this document sets out:

- a summary of Apple's Mobile Platform and our strategic objectives when considering possible measures we might take under the digital markets competition regime;
- the legal framework and prioritisation approach for interventions;
- our current view on how we will prioritise interventions; and
- next steps, including how stakeholders can provide their views on the sequencing of our work.

Apple's Mobile Platform and our strategic objective

2.10 Apple is a technology company that sells consumer electronics, in particular its smartphone (the iPhone) and tablet (the iPad). Its products are "designed to be loved" with a focus on a highly accessible, intuitive and easy to use customer experience. That focus extends across a user's entire experience on Apple's devices.

2.11 Apple delivers this user experience in part through a highly integrated and tightly controlled ecosystem. At the heart of this is the operating system which runs its devices – iOS on the iPhone and iPadOS on the iPad. These operating systems act as an intermediary between hardware and software, enabling software applications (referred to as 'apps') and services to run on the device.

2.12 As set out in the introduction, mobile devices are a key method by which users access content and services online and users use apps to carry out functions on their device. In particular, apps enable users to view, engage and access content, whether that be playing games, watching videos, browsing the web, accessing social media or communicating. Apple produces its own apps (referred to as 'first-party apps') as well as allowing its users to download apps developed by third parties. The large array of apps available on Apple's Mobile Platform is (in aggregate) a key part of its proposition, allowing its mobile devices to be used for the wide range of different tasks that users now expect – indeed it went so far as Apple trademarking the phrase 'there's an app for that'.[30] As part of controlling and curating its user experience, Apple tightly controls the apps which can operate on its operating systems and the functionality within the operating system these apps have access to.

2.13 Apps can be downloaded through Apple's App Store which comes pre-installed. Alternative app stores are not permitted on iOS and iPadOS and nor can users download and install apps directly from the web (referred to as 'sideloading'). This means for any app developer wanting to distribute content and services through an app they must go through Apple and be subject to its terms and conditions for distribution through the App Store. These cover areas like safety, performance, app design, and legal and regulatory requirements, as well as requiring approval through Apple's app review process. Apple also takes a commission fee of up to 30% for distributing apps through its app store, depending on the business model and scale of the app developer, as well as the nature of the transaction.[31]

2.14 One of the most important apps to users is the browser, which enables users to access websites. Apple pre-installs its own browser, Safari. Users can choose to download third-party browsers, but these must all use Apple's browser engine WebKit, meaning that Apple continues to tightly control how browsers function on its operating systems.

2.15 Apple's tightly controlled and integrated ecosystem is in large part designed to deliver the Apple experience to users. Apple's co-founder Steve Jobs described this as Apple seeking to ensure the products and services 'just work'. However, by definition, these controls, and how they are exercised, have a significant impact on millions of businesses delivering content to users via apps on mobile devices. And for these businesses there is little alternative.

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[30] See Legal - Trademark List - Apple.

[31] See Programs overview (Apple's website), App Store Small Business Program (Apple's website), and App Review Guidelines. See also Every Apple App Store fee, explained: How much, for what, and when.

The majority of internet access in the UK is now undertaken through mobile devices,[32] and Apple's has around a [50-60%] share of these devices.[33]

2.16 We recognise that Apple has driven innovation in respect of its Mobile Platform and also provided a basis for some innovation from app developers, resulting in benefits for consumers using Apple's Mobile Platform. However, our concern is that Apple can use its position and power to control the pace and direction of this innovation, including to focus on its own interest, rather than necessarily where this would benefit consumers, app developers, and businesses more widely, as it would be forced to do if it faced more competition. For example, we consider that Apple's controls and the way these are implemented could be acting as a brake on innovation from app developers.

2.17 The Proposed SMS Decision we are consulting on today sets out the analysis supporting our provisional view that Apple has SMS in its Mobile Platform.[34] Through our investigation thus far, we've heard concerns, including:

- That Apple's review process for apps to be distributed on its App Store can be lengthy and unpredictable, introducing additional risk for UK app developers; in particular, where an app or update is innovative, there is additional uncertainty how Apple's App Store Guidelines will apply and whether Apple will permit such app or update.

- That as a result of its app review, Apple has access to lots of data and information about its competitors which it could use unfairly to improve its own services.

- That Apple can use its control of the App Store ranking algorithm to preference its own apps over those of third parties.

- That Apple's commission fees make the development and distribution of some digital content and services unviable (with implications for producers of digital content and services like streaming of music and TV, newspapers, audiobooks, in-app gaming purchases like coins or tokens). Apple places restrictions on the ability of app developers to steer consumers outside of the app, for example to alternative ways to purchase digital content and services.

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[32] See Ofcom Communications Market Report 2024: Interactive data; Online Use – Websites & Apps; Time Spent Online.
[33] See Annex A: Market Outcomes (Apple), Figure A.3.
[34] See SMS Proposed Decision in respect of Apple's mobile ecosystem.

- That Apple restricts the features and functionality third-party app developers have access to within its iOS and iPadOS operating systems, in turn limiting the features and functionality third-party app developers can offer to consumers in their apps. Concerns have been raised in areas such as digital wallets, connected devices and AI services. In addition, Apple requires all browsers that wish to operate on iOS and iPadOS to use its browser engine WebKit, limiting the features and functionality third-party browsers can offer.

2.18 Our objective is to promote greater competition such that UK app developers and innovators developing and distributing content via Apple's Mobile Platform are able to innovate and grow their businesses. However, in taking action to pursue this objective, we seek to do this in a way which is cognisant of and, to the extent possible, works with Apple's integrated ecosystem model, recognising the potential for certain benefits to arise for users of Apple's Mobile Platform. We also want to ensure Apple itself is able and incentivised to innovate and invest in its own platform and services.

International and UK regulatory context

2.19 The UK is one of a number of jurisdictions around the world taking action to support businesses and consumers through open and innovative digital markets. Relevant measures have been imposed, or are under consideration, in other jurisdictions, including:

- **In the US, the *Epic Games Inc vs Apple Inc* case,** where Apple has been found to have implemented unlawful 'anti-steering' requirements. It was ordered to allow app developers to include external links (and other similar mechanisms) that direct users to alternative ways to purchase digital goods and services (eg on the app developer's own website).[35] Apple is currently required to offer this for free.[36]

- **In the EU, Apple's compliance with the Digital Markets Act** in relation to its designations as a gatekeeper for its operating systems, its app store, and its browser. This places a series of obligations on Apple relating to how it operates these activities, such as preventing self-preferencing in ranking and requiring certain interoperability requirements.[37] The European Commission recently issued a non-compliance decision against Apple for its app store anti-steering provisions,[38] has an ongoing non-

[35] See Epic vs Apple Permanent Injunction, 10 September 2021.
[36] See Epic vs Apple judgment from Northern District of California granting Epic's motion, 30 April 2025.
[37] See The Digital Markets Act: ensuring fair and open digital markets - European Commission.
[38] See Commission finds Apple and Meta in breach of the Digital Markets Act.

compliance investigation into Apple's contractual terms for app developers,[39] and has issued two specification proceedings relating to Apple's interoperability obligations (one on Apple's process for addressing interoperability requests, and one on connected devices; both of which are under appeal).[40]

- **In Japan, the full implementation of the Mobile Software Competition Act,** required no later than December 2025, under which Apple has been designated as a Specified Software Operator.[41]

- **In Brazil in 2024, CADE** (Administrative Council for Economic Defense, Brazil's antitrust enforcer) **mandated that Apple eliminate restrictions on in-app payment methods**, including by allowing tools such as hyperlinks to external websites and offering alternative in-app payment processing options.[42]

2.20 In line with our prioritisation principles and the UK Government's strategic steer to the CMA,[43] we are closely observing these developments and others around the world. We will prioritise measures which complement international action, where this will deliver benefits for UK businesses and consumers, and will also consider views on any potential implications these actions (and Apple's subsequent compliance changes) have for our own work. In particular, where there are overlaps in areas we are prioritising in this Roadmap, we will take account of these interventions in developing our proposed approach, recognising the need for coherence but that we must also ensure our remedies are effective and proportionate in delivering a positive impact in the UK.

2.21 Domestically, we are also working closely with other UK regulators with relevant ongoing work, such as the FCA and PSR who have shared the views they gathered from stakeholders in their Call for Information relating to digital wallets.[44] We will engage with these bodies to ensure we effectively manage the interactions with their work and benefit from their expertise.

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[39] See Commission sends preliminary findings to Apple and opens additional non-compliance investigation against Apple under the Digital Markets Act.
[40] See Commission provides guidance under Digital Markets Act to facilitate development of innovative products on Apple's platforms.
[41] See Japan's FTC to regulate Google and Apple under new smartphone law.
[42] See Technical body of Brazil antitrust regulator recommends ruling against Apple in iOS case.
[43] See CMA prioritisation principles, 30 October 2023; see also Strategic steer to the Competition and Markets Authority, Department for Business and Trade, 15 May 2025.
[44] See FCA and PSR report on digital wallets | FCA.

The legal framework and our prioritisation approach

How will priority interventions set out in the Roadmap be developed?

2.22 Our Roadmap sets out interventions we are prioritising for further work. This does not mean that we will definitely impose these interventions, should Apple be designated as having SMS. Rather, it is a commitment to undertake further work to understand the relevant issues and, if warranted, to design effective and proportionate interventions, in accordance with the legal framework.

2.23 The Act enables the CMA to introduce interventions on designated firms in the form of Conduct Requirements (**CRs**) or Pro-Competition Interventions (**PCIs**).

2.24 We will only intervene where there is evidence that it would be effective and proportionate to do so. Before being imposed, any potential CRs or PCIs will be subject to careful assessment and public consultation, in accordance with the processes and legal framework set out in the Act and our Guidance.[45]

2.25 CRs can only be imposed for the purposes of one or more of the following statutory objectives:[46]

- **Fair dealing**: that users or potential users[47] of the relevant digital activity are treated fairly and able to interact, whether directly or indirectly, with the undertaking on reasonable terms;
- **Open choices**: that users or potential users of the relevant digital activity are able to choose freely and easily between the services or digital content provided by the undertaking and services or digital content provided by other undertakings; and
- **Trust and transparency**: that users or potential users of the relevant digital activity have the information they require to enable them to:

  (i) understand the services or digital content provided by the undertaking through the relevant digital activity, including the terms on which they are provided, and

[45] See Digital markets competition regime guidance, December 2024 (**CMA194**).
[46] Sections 19(5)-19(8) of the Act.
[47] 'Users' means any users of the relevant service or digital content, and includes any person, legal or natural: section 118(1) of the Act. This is to be understood in very broad terms to include a person or business that interacts in any way with the relevant digital activity, at any level of the supply chain: explanatory notes to the Act, paragraph 533(f).

(ii) make properly informed decisions about whether and how they interact with the undertaking in respect of the relevant digital activity.

2.26 CRs must also be of a 'permitted type' set out in an exhaustive list in the Act (for example, requirements to trade on fair and reasonable terms, refrain from restricting interoperability or not use data unfairly).[48]

2.27 PCIs can only be imposed following a further investigation that identifies an adverse effect on competition arising from factors relating to a digital activity in which a firm has been designated with SMS.[49]

2.28 We will consider whether any CR or PCI will be effective in achieving its intended aim. In making this assessment, we will consider the likely impact the intervention would have on the identified concern, its timescale, the associated risks of not achieving its intended aim or giving rise to unintended consequences, and practical considerations. We will also consider whether a particular CR is sufficiently flexible to be future-proofed against foreseeable changes.[50]

2.29 Any CR or PCI must also be proportionate for the purpose for which it is imposed. This means it must:

- be effective in achieving its intended aim;
- be no more onerous than it needs to be to achieve that aim;
- be the least onerous measure, where there are multiple equally effective options; and
- not produce disadvantages disproportionate to its aim.

2.30 Before imposing a CR or PCI, we will also take account of consumer benefits. This will include the benefits for consumers that would likely result (directly or indirectly) from the CR or PCI; as well as the loss of any benefits that may be generated by the conduct which a CR or PCI is directed at.[51]

[48] Section 20 of the Act.
[49] Section 46 of the Act.
[50] See CMA194, paragraphs 3.31 and 4.30.
[51] For example, see CMA194, paragraphs 3.34 and 4.36 – 4.39.

How has the CMA prioritised our work on potential interventions?

2.31 As noted in our published Guidance,[52] and as expanded on in our paper 'Delivering the 4Ps under the digital markets competition regime' published in April 2025,[53] the CMA will have regard to its Prioritisation Principles[54] when considering whether and how to intervene in digital markets, informing our decisions about which issues to tackle and which interventions to select. There are five principles the CMA will consider:

- **Impact:** The CMA will prioritise those interventions which have a clear and beneficial impact for UK consumers, businesses and the UK economy.
- **Strategic significance:** As part of considering whether the action fits with the CMA's objectives and strategy, it will prioritise pro-growth and pro-investment interventions, and those which can support growth and international competitiveness in the growth-driving sectors identified in the UK Government's industrial strategy.
- **Whether the CMA is best placed to act:** The CMA will consider the interplay of digital markets issues with the actions of other regulators and government bodies domestically and internationally.
- **Risk:** The CMA will rate as high-risk interventions where the overall impact is unlikely or highly uncertain, or there is a high risk of unintended effects.
- **Resources:** The CMA will rate an intervention as requiring high resources where significant resource from the CMA is needed to design, implement, monitor or enforce it.

2.32 Having applied the prioritisation principles, we have grouped the interventions we are considering into four categories:

- **Category 1 Interventions:** Potential CRs where we consider there is likely to be a strong case for intervention and where the CMA is well placed to act more quickly, accounting for the potential impact, strategic significance, resource and risk of intervening. We will prioritise immediate work on these potential interventions with the aim of beginning to consult on these following any final decision to designate Apple with SMS, from autumn 2025.

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[52] See CMA194, chapter 3 (Conduct Requirements) and chapter 4 (Pro-Competition interventions) for further information.
[53] See Delivering the 4Ps under the digital markets competition regime, 30 April 2025.
[54] See CMA prioritisation principles, 30 October 2023.

- **Category 2 Interventions**: Potential CRs or PCIs on which we think there may be a case for action, but where issues require further consideration, and potential interventions may be more complex to develop. Subject to our further analysis, we will aim to consult (in the case of CRs) or launch investigations (in the case of PCIs) from the first half of 2026 onwards.

- **Category 3 Interventions:** Potential CRs or PCIs which we do not expect to pursue in the first half of Apple's SMS designation period. These may relate to areas where we do not currently consider there is a case for intervention, or where we would only seek to pursue measures at a later date, should our priority interventions not address issues as we intend. Depending on our assessment of the evidence at the time, we may revisit the case for intervention in these areas as we update the Roadmap for the second half of the designation period.

- **Areas where we are still considering prioritisation, subject to international developments:** Some potential interventions may be impacted by developments in other jurisdictions, in particular US litigation and the Digital Markets Act (DMA) in Europe. We have not placed those potential interventions into the categories above at this stage. We expect to confirm our approach to these interventions in the updated Roadmap in the first half of 2026. In line with the CMA's prioritisation principles and the UK Government's strategic steer to the CMA, we will take appropriate account of measures that have already been taken or are proposed internationally.[55]

2.33 In coming to a view on prioritisation, we have been informed by our ongoing engagement with businesses, consumer and civil society groups, and industry experts, as well as responses to our invitation to comment,[56] and our evidence requests to parties. In total we have heard from over 100 parties, collecting views on Apple's Mobile Platform position, potential interventions, and how these interventions should be prioritised.

2.34 In this document we have referred to the proposed decision on designation[57] and other publicly available evidence to provide examples of the evidence supporting our prioritisation. However, our thinking has been informed by the full range of detailed evidence we have gathered in the course of the investigation. We will set out the evidence in more detail when we consult on any specific intervention.

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[55] Strategic steer to the Competition and Markets Authority, Department for Business and Trade, 15 May 2025.
[56] SMS investigations into Apple and Google's mobile ecosystems - GOV.UK.
[57] SMS Proposed Decision in respect of Apple's mobile ecosystem.

2.35 As we develop the detail of our approach, we will continue to consider the evidence and engage with a wide range of parties via workshops, bilateral meetings and other routes to ensure any interventions take into account a wide range of perspectives.

3. The Roadmap in respect of Apple's Mobile Platform

3.1 This section sets out how and why we are proposing to prioritise the assessment of possible interventions and when stakeholders can expect to input into our detailed consideration of these issues.

3.2 Figure 1 summarises our proposed prioritisation. The following sections provide more detail on why particular interventions have been grouped into each category.

3.3 Our proposed SMS designation would cover Apple's Mobile Platform which we define as its iOS and iPadOS operating systems, the App Store on mobile devices and Safari browser and WebKit browser engine on mobile devices. Any proposed measures in relation to the App Store, Safari and WebKit would therefore apply, unless otherwise stated, across mobile devices. However, for measures which apply to the operating system(s), these may apply to iOS and/or iPadOS only as appropriate. The appropriate scope for any intervention will be further considered as part of the work proposed in the roadmap.

Figure 1: Overview of prioritisation of potential measures

Prioritisation category	Potential measures
Category 1: CRs we will prioritise immediate work on, with the aim of beginning to consult on these following any final decision to designate Apple with SMS, from autumn 2025	• Requiring that Apple reviews apps to be distributed in its app store in a fair, objective and transparent manner. • Requiring that Apple ranks apps in its app store in a fair, objective and transparent manner. • Requiring that Apple does not use data collected for the purposes of reviewing apps unfairly, such as for its own app development purposes. • Requiring that Apple allows app developers to direct their potential customers off the App Store (steering). • Requiring Apple to fairly and objectively consider requests from third parties for interoperable access to functionality in its operating systems.

Category 2: Potential CRs or PCIs on which, subject to our further analysis, we will aim to consult (for CRs) or launch investigations (for PCIs) from the first half of 2026 onwards	• Requiring that Apple enables interoperable access for third parties to key functionality in its operating systems in relation to the following key use cases:
	  ○ Digital wallets (iOS only)
	  ○ Connected devices
	• Requiring Apple to allow third-party browsers and app developers to use alternative browser engines on iOS and iPadOS.
	• Requiring that Apple's choice architecture in relation to digital wallets and browsers supports active user choice and does not give Apple's own products and services an advantage over those of third parties.
	• We will explore the factors likely to be of particular importance for the development of AI services on mobile with a view to considering whether measures are needed such as greater interoperability, and improved choice architecture.
	• We will undertake further work to explore the potential for Progressive Web Apps.

Category 3: Potential CRs or PCIs which we do not expect to pursue in the first	• Requiring that users are able to set key third-party apps as their defaults, not only Apple's own apps. • Requiring improved data transfer and switching APIs to enable users to more easily switch between iOS and Android ecosystems.

half of Apple's SMS designation period	• Requiring Apple to make changes to greater enable mobile network operators to undertake network slicing, and other connectivity measures. • Requiring that Apple makes changes to its privacy policies regarding advertising (eg App Tracking Transparency (ATT), Intelligent Tracking Prevention (ITP), and Private Relay). • Requiring Apple to provide third-party browsers using WebKit with access to equivalent functionality as that used by Safari.
Areas where we are still considering prioritisation, subject to international developments: Categorisation to be confirmed in update to Roadmap in the first half of 2026	• Requiring Apple to allow alternative app stores in iOS and iPadOS. • Requiring Apple to allow users to download apps directly from the app developer's own website ('sideloading'). • Requiring Apple to allow alternative payment methods for in-app purchases beyond Apple's own in-app payment system. • Action to address the impact on competition arising from the revenue share agreement between Apple and Google.

Category 1: Potential conduct requirements we will aim to begin consulting on from autumn 2025

3.4 The following are issues we will prioritise immediate work on, with the aim of beginning to consult on potential conduct requirements following any final decision to designate Apple with SMS, from autumn 2025. They are areas where we consider there is a strong case for action to address immediate concerns market participants have raised with us, and where the CMA is well placed to act quickly, accounting for the potential impact, strategic significance, resource and risks of intervening. In several cases they build on solutions that Apple has already implemented in other countries, or has introduced on a voluntary basis in the UK but where there would be benefit for businesses and consumers in underpinning this with a specific CR.

Requiring that Apple reviews apps to be distributed in its app store in a fair, objective and transparent manner

3.5 Apple's control over its app store allows it to unilaterally decide which apps reach UK users on iOS and iPadOS. UK developers that have iPhone or iPad customers, and new app developers who are looking to serve customers in the UK, are reliant on getting their apps onto the App Store, and keeping them there. In order to be admitted onto Apple's App Store, an app developer must submit its app for review and approval by Apple, repeating this process if it wants to make any major changes or updates. Whilst Apple's app review serves a legitimate purpose, failing to be approved, or subsequent removal from the Apple app store, would have the potential to imperil any product or service which relies on a native app as its primary route to accessing its customers. It could also cause serious harm to affected consumers, for example preventing them from accessing purchased content such as games and audio, preventing them from shopping with their preferred retailer, or disconnecting them from their mobile banking.

3.6 We have heard from stakeholders that Apple's app review is often non-transparent and applied inconsistently. For example, participants in our app developer workshop identified Apple's app store as one area where they face substantial difficulty in developing effective commercial strategies as a result of the unpredictability of Apple's rules and policies, and the stringency, lack of flexibility, and lack of transparency of its app review process.[58]

[58] See App Developer Workshop Summary, Mobile SMS Investigations, 24 March 2025.

3.7 Any uncertainty or delay in this review process can dissuade app developers from launching new services and chill innovation. Therefore, the aim of this intervention would be for Apple to improve its app review process, providing third-party app developers with greater certainty in relation to the terms on which they do business on Apple's app store. Stakeholders have told us that they would support this measure.[59] As well as providing app developers with greater certainty, this measure would enable them to understand and resolve issues with their apps promptly (including security issues), accelerate their route to market and save significant time.

3.8 Interventions in this area could specifically require Apple to, for example:

- Review apps that want to list on Apple's app store fairly.
- Have a transparent process for app review and provide explanations for delays or rejections.
- Give fair warning when Apple materially changes app review process or guidelines, including how Apple interprets and applies them.
- Establish an appropriate mechanism for businesses to raise concerns with Apple and ensure these concerns are addressed.

Requiring that Apple ranks apps in its app store in a fair, objective and transparent manner

3.9 The discoverability of apps on the app store can be a key factor in determining their overall success. Indeed, organic search on the app store is a crucial customer acquisition channel for app developers[60] and a body of behavioural science research also supports the importance of high search ranking more generally.[61]

3.10 This could cause an issue if Apple treats its first-party products and services more favourably than third parties'. Further, Apple may also have an incentive to promote the discoverability of first-party apps and/or apps that follow a

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[59] For example, see Epic's ITC response, page 4 and 28-30; Match's ITC response, page 2; Open Web Advocacy (OWA)'s ITC response, page 19.

[60] For example, the Mobile Ecosystem Market Study found that organic search, through categorical queries (ie meaning for a generic type or category of app) or navigational queries (ie for a specific app name), was the most important customer acquisition channel for app developers. See Mobile Ecosystem Market Study, Final Report, paragraph 6.78 onwards.

[61] For example, see: Online search: Consumer and firm behaviour - A review of the existing literature, CMA (2017); The EU Google decisions: Extreme enforcement or the tip of the behavioural iceberg?; Fletcher, A (2019); and It's Good to Be First: Order Bias in Reading and Citing NBER Working Papers. The Review of Economics and Statistics, 99(1). Feenberg, D., Ganguli, I., Gaulé, P., & Gruber, J. (2017).

specific business model (eg such as those using its proprietary in-app payment systems) and thus generate ongoing commission income for itself.

3.11 Distortions in ranking of apps would make it harder for UK users to find apps which best meet their needs. Therefore, if Apple can arbitrarily change its approach to ranking, or obfuscate its reasoning, then UK app developers may be more reluctant to invest the capital and resources required to improve their services and/or innovate since there is greater uncertainty over whether they would have a fair opportunity to reach relevant customers. At the same time, users may be less able to find the best services within the app store.

3.12 This package of interventions would aim to ensure Apple does not treat its first-party products and services more favourably than third parties'. This in turn should provide app developers with increased confidence and certainty as to how their apps will be ranked and fair opportunities to reach consumers.

3.13 Interventions in this area could specifically require Apple to:

- Rank and display apps in a fair way;
- Provide more transparency over its ranking methodology (including the criteria used and their relative weight) eg through disclosure to the CMA and/or through an appropriate publication;
- Provide a reasonable period of notice to app developers before making changes which are likely to have a material impact to the ranking algorithm and explain what these changes are; and
- Establish an appropriate mechanism for businesses to raise concerns with Apple and ensure these concerns are addressed.

Requiring that Apple does not use data collected for the purposes of reviewing apps unfairly, such as for its own app development purposes

3.14 As part of running its app store, Apple has access to large amounts of data associated with the apps that it hosts on the App Store, in particular from the review it undertakes for new apps and app updates.

3.15 We have heard concerns that Apple may use this data to support its own development of first-party apps – giving itself an unfair competitive advantage over third-party apps and disincentivising innovations from being brought to market by third-party app developers. Multiple participants in our app developer workshop stated that Apple (and Google) have the ability to unfairly copy innovation that is driven by third-party app developers because they have access to third-party code and data, allowing them to use this to unfairly

improve their own first-party apps.[62] The aim of this intervention would be to improve business certainty and allow app developers to introduce new innovations and products without the fear of Apple taking advantage of their data.

3.16 This intervention would require Apple to ensure that it has systems and controls in place to prevent the use of app developers' non-public information for the purpose of its own first-party app development.

Requiring that Apple allows app developers to direct their potential customers off the App Store (steering)

3.17 Under its existing Apple App Store terms and conditions in the UK, Apple places restrictions on app developers informing users about offers and including links that redirect users outside of Apple's app store (sometimes referred to as restrictions on 'steering'). This is one mechanism by which Apple exerts control over native app distribution on its Mobile Platform and has contributed to some app developers removing the ability to buy subscriptions or similar through the App Store entirely, due to concerns over fees, inability to set individual prices, and the loss of the customer relationship.

3.18 The aim of this remedy would be to address these restrictions by allowing UK app developers to inform or steer users outside of the app store, for example by providing a link to an external website to complete transactions.

3.19 We would expect this potential intervention to provide UK app developers with more opportunities to improve their products and grow their businesses. In particular, it could place downward pressure on Apple's current commission rate by allowing UK app developers to transact with users outside of the App Store and in doing select an alternative payment processing provider (ie not Apple). This would also enable UK app developers to have a direct billing relationship with their customers, enabling them to freely set commercial terms, control refunds, and conduct promotions. This would, in turn, allow innovative business models which are not currently viable to develop, and others to reinvest in improved quality and prices.

3.20 We have seen the potential benefits of this approach in the US, in the context of changes that Apple was required to make. As a result of a court judgment Apple is currently obliged to allow steering by app developers with no

[62] See App Developer Workshop Summary, Mobile SMS Investigations, 24 March 2025.

associated fees and minimal frictions.[63] Some examples of the resulting benefits for users include:

- Spotify updated its app to allow for 'user-friendly' changes such as the ability to provide clear pricing information, link and change subscriptions. It also allows users to buy individual audiobooks and purchase additional "Top Up" hours for audiobook listening beyond the 15 hours included in Premium each month.[64]
- Kindle introduced a new "Get Book" option in its iOS and iPadOS apps, allowing users to purchase books more easily.[65]
- Proton (a provider of high-privacy software products)[66] announced that it would be reducing its prices to US users by up to 30%.[67]
- Patreon (a content creator platform) has rolled out an updated version of its app that now allows users to make purchases via the web.[68]

3.21 The specific design of any potential steering intervention is likely to have important implications for its effectiveness and proportionality. For example, it may be important to minimise any 'friction' for app developers steering users outside an app, especially if this is to be of benefit in areas like mobile gaming.

3.22 We will consider design aspects carefully as we develop our approach, for example regarding how any links operate (eg whether it can only be used to complete a transaction or to steer more broadly, what it can link to and the use of dynamic links), the customer journey (eg any interstitial screens they encounter), and any associated fees that Apple might charge the app developer. In doing this we will take careful account of developments in other jurisdictions, but need not adopt a 'lift and shift' approach, rather ensuring an approach that is appropriate in the UK.

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[63] See Epic vs Apple judgment from Northern District of California granting Epic's motion, 30 April 2025. Apple is appealing this decision.
[64] See Following Landmark Court Ruling, Spotify Submits New App Update to Apple to Benefit U.S. Consumers — Spotify.
[65] See Apps like Kindle are already taking advantage of court-mandated iOS App Store changes - Ars Technica.
[66] See Proton's ITC response.
[67] See "No Apple tax means we will lower prices" - Proton promises price drop after US ruling against Apple | TechRadar.
[68] See Patreon's app can now accept web payments after US App Store changes | TechCrunch.

Requiring Apple to fairly and objectively consider requests from third parties for interoperable access to functionality in its operating systems

3.23 We have heard concerns that Apple's control over its operating systems allows it to control the features and functionality UK companies can access and incorporate into their apps. Some examples of concerns that have been raised with us regarding Apple's restrictions on interoperability include from CODE members[69] covering: bluetooth seamless out of box detection and set up; seamless, high speed connectivity and file sharing; voice assistants and AirPods; payments apps; interacting with notifications, including on a wearable; AirPlay casting and receiving; wearable ecosystem APIs; and "Find My" functionality.

3.24 Whilst Apple provides avenues for app developers to request access to functionality not currently available within its mobile operating systems, it is unclear the factors which are considered by Apple when making these decisions, or the timeline in which Apple will consider these requests. Furthermore, we have heard concerns that the justification for these decisions is not always clear to app developers. This results in limitations in how UK app developers are able to develop new products and services. Furthermore, uncertainty reduces incentives to invest in new propositions which require functionality not currently available. This all feeds through into less choice and innovation for UK consumers.

3.25 The aim of this potential intervention would not be to create a default interoperability requirement but rather to require that Apple fairly and objectively considers requests from app developers for interoperable access to features within its iOS and iPadOS operating systems, and does so in a timely manner. This could mean that an app developer has a clear route to requesting the necessary access to functionality, and a clear understanding of the criteria and reasoning for Apple's decision, which might include factors such as the engineering cost required to make the necessary changes. We expect this intervention would provide app developers with more confidence to develop products and services utilising functionality within Apple's mobile operating systems.

Category 2: Measures we will consider from the first half of 2026

3.26 This category includes potential CRs or PCIs on which we think there may be a case for action, but where issues require further consideration, and potential interventions may be more complex to develop. Subject to our further

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[69] See Coalition for Open Digital Ecosystems' (CODE) ITC response.

analysis, we will aim to consult (in the case of CRs) or launch investigations (in the case of PCIs) in these areas from the first half of 2026 onwards.

Requiring that Apple enables interoperable access for third parties to key functionality in iOS and iPadOS in relation to key use cases

3.27 Through iOS and iPadOS, Apple can impose limitations or bans on interoperability which reduce the ability for third parties, including UK app developers, to compete effectively (particularly where these third parties compete with Apple's own first-party services). Interoperability limitations result in third parties being unable to access key functionality for certain purposes, such as the NFC chip to undertake payments. While we have proposed including a general requirement on Apple to adopt an objectively justified basis for assessing interoperability requests in Category 1, we consider that there may be a need for positive obligations on Apple in relation to these key use cases.

3.28 The key use cases we have currently identified are:

- Digital wallets; and
- Connected devices.

3.29 We will keep other key use cases under review and may revisit these if evidence emerges which suggests there are other areas where restrictions on interoperability may be acting as a blocker to innovation.

Digital wallets

3.30 Digital wallets are apps that securely store users' information (including payment information) in a single location, potentially allowing it to be used in numerous different settings (eg online payments, point of service, digital identity verification, tickets, etc).

3.31 In the context of payments, digital wallets are a component of financial services, a major part of the UK economy and represent one of the high priority sectors identified in the UK Government's industrial strategy.[70] Furthermore, the popularity of digital wallets for payments in the UK is increasing rapidly, with the proportion of card transactions using a digital wallet increased from 8% in 2019 to 29% in 2023,[71] with a higher proportion at in-store terminals. Digital wallets are likely to play a key role in future

[70] See Invest 2035: the UK's modern industrial strategy - GOV.UK.
[71] See FCA/PSR's ITC response, page 1.

innovation and growth in the UK payments sector, as well as wider financial services.

3.32 There is increasing interest in digital wallets being used for alternative use cases beyond payments, such as digital identity services and digital keys.[72] Many of these services are reliant on using the Near Field Communication (NFC) chip.[73]

3.33 Until recently in the UK, Apple prohibited third parties from accessing the NFC chip on its smartphones and this was only accessible to Apple's own digital wallet. Respondents to the FCA/PSR's call for information on Big Tech and Digital Wallets raised concerns that Apple's restrictions on access to the NFC chip may have hindered innovation, preventing or delaying higher quality, differentiated products such as:[74]

- New features, further financial insights, spending predictions, and personalised recommendations for rewards and discounts;
- Wallets covering wider financial services such as banking, lending, investments, and insurance into a single app; and
- Centralised identity hubs holding virtual IDs, passports, licences, and health records, as well as the opportunity for seamless cross-border and international transactions.

3.34 We have heard from financial services companies and Fintechs that addressing Apple's practices in this respect in the UK, including in relation to choice architecture, would allow them or others to introduce new products (eg rival digital wallets) and generally, new features and functionalities more swiftly.[75] It could also place greater competitive pressure on Apple to improve its own digital wallet, including the terms and conditions of use.

3.35 We are aware that in Europe Apple has committed to provide, and subsequently released, a solution that provides access to the NFC chip free of

[72] For example, the UK Government is currently developing its own digital wallet to store government-issued documents: GOV.UK Wallet - GOV.UK.
[73] We note that iPads do not currently include NFC chips, and so any potential intervention focused on access to this functionality would be unlikely to apply to iPadOS.
[74] See FS25/1: Big tech and digital wallets, paragraphs 3.11 to 3.14.
[75] See for example: Financial Service Firm B's ITC response, paragraphs 52-62; Financial Service Firm A's ITC response, paragraph 2.1, 2.4-2.7 and 3.1-3.3; Santander's ITC response, paragraph 1.10.

charge.[76] The solution in Europe has already resulted in innovative and competing offerings, for example:

- Vipps MobilePay launched an alternative to Apple Pay on iPhones, allowing users in Norway to pay instore by tapping with their phone;[77] and
- PayPal announced its plans to launch a digital wallet in Germany including instore payment using NFC, with cashback offers and the option to spread payments, as well as the ability to see consolidated views of online and offline purchases.[78]

3.36 Meanwhile, Apple has recently released an alternative solution in the rest of the world, including the UK, for which it charges a fee. We are keen to ensure that this solution provides for effective access to the NFC chip on Apple smartphones, such that third parties, including in the UK's cutting edge and globally competitive FinTech sector, can bring innovative products and services to market, benefitting UK consumers.

3.37 As part of this work we will consider what functionality is required in order for third parties to deliver a compelling and competitive digital wallets proposition, as well as the terms and conditions Apple apply to this including any associated fees. Any potential intervention to grant access to the NFC chip would only apply to iOS (not iPadOS, due to the lack of NFC chips in iPads).

Connected devices

3.38 Connected devices are physical products which interact with other mobile devices, in particular smart phones. They can share data, notifications, and user actions across multiple platforms quickly and easily. This is a large, expanding, and increasingly important, set of products which includes smartwatches, smart rings, headphones, TVs, and AR/VR headsets.

3.39 Apple often restricts interoperability between its mobile ecosystem and third-party devices, which can impact the ability for third-party app developers to innovate and offer high quality experiences for their customers. For example:

- The founder of smart-watch company Pebble set out publicly a list of things which are harder or impossible for third-party smartwatches (ie non-Apple Watches) to do on iPhone, including issues around sending

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[76] See Commission accepts commitments by Apple opening access to 'tap and go' technology on iPhones.
[77] See Vipps MobilePay launches the world's first alternative to Apple Pay on iPhone.
[78] See Press Release: "Better than cash": PayPal announces plans to revolutionize in-store payments in Germany.

messages from the watch, replying to notifications or taking actions, interacting with other iOS apps.[79]

- Samsung stated that hardware interoperability measures, including ensuring that third-party wearables work as well on iOS as they do on Android, would help bringing down mobile phone switching cost to consumers who wish to pair their new mobile device with their existing wearable devices.[80]

- Meta stated that Apple's restrictions of functionality prevented third parties (but not Apple itself) from offering consumers a seamless, out-of-the-box pairing experience and properly responding to notifications, as well as requiring users to open apps on their iPhones and click on pop-up screens each time they want to connect their iPhones to their non-Apple device.[81]

3.40 Given this limited interoperability, users can be 'locked' into Apple's mobile ecosystem and innovative connected device manufacturers in the UK, and their associated software developers, could be prevented from operating and/or growing.

3.41 The design of any potential intervention will particularly consider what functionality is required in order to allow app developers and manufacturers of connected devices to continue to innovate effectively, and any justified restrictions that might be required. As we noted above, we are aware that the EU has recently issued a decision specifying the measures that Apple must take to comply with certain aspects of its interoperability obligations on connected devices, in particular relating to nine iOS connectivity features predominantly used for connected devices such as smartwatches, headphones or TVs.[82] The CMA will take account of developments in the EU, to the extent relevant and appropriate, as we take forward our own work in this area.

Requiring Apple to allow third-party browsers and app developers to use alternative browser engines on iOS and iPadOS

3.42 Browsers, along with native apps, are one of the two key gateways to accessing digital content on mobile devices. UK smartphone users spend an average of three hours a day using their devices, of which around 30 minutes

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[79] See Apple restricts Pebble from being awesome with iPhones.
[80] See Samsung's ITC response, paragraph 11.
[81] See Meta's ITC response, paragraph 2.4.
[82] See Commission provides guidance under Digital Markets Act to facilitate development of innovative products on Apple's platforms.

is spent in dedicated mobile browser apps.[83] The capability of browsers (and of the underlying browser engines) also has a powerful influence on how web developers code their sites, in particular if there is a lack of support for certain features amongst the largest browsers/browser engines.

3.43 While Apple allows a choice of browsers on its operating systems, it prohibits these from using any browser engines other than its own – specifically the version of WebKit which comes as part of the operating system. This reduces opportunities for innovation around the browser engine through fair competition, but even more importantly, constrains the capabilities and potential for differentiation of the browsers themselves. For example, browser developers have stated that limitations in WebKit have restricted or prevented features such as:[84]

- Restricting the ability for the browser vendor to offer additional security and privacy features and improvements;
- Reduced performance compared to what they would expect to achieve with alternative browser engines;
- Lacking important functionality to support websites, web apps and Progressive Web Apps, undermining the ability to offer a compelling user experience.

3.44 The aim of this measure would be to allow alternative browser engines to enter and compete in iOS and iPadOS. It could promote a greater diversity of features and functionalities, which would improve the range and quality of services available to UK users. In addition, we would expect this measure to increase the competitive pressure on Apple to add new features to Safari/WebKit and improve its services as a result.

3.45 The core of this measure would involve allowing third-party browsers and app developers to use alternative browser engines on iOS and iPadOS. However, there are likely to be additional requirements in order to ensure this has the intended effect, which may include the following obligations on Apple:

[83] See Browser MI footnote 153: Statista, Share of global time spent on browsers and apps 2022; Statista, Number of smartphone users in the UK 2020-2029.
[84] See Mobile Browsers and Cloud Gaming, Final Report, chapter 4 particularly paragraphs 4.42, 4.45, 4.53, 4.110, 4.119, and 4.122.

- Providing third-party mobile browser vendors using alternative browser engines with the necessary functionality to develop and operate their browsers; and

- Allowing the use of alternative browser engines for in-app browsing.[85]

Requiring that Apple's choice architecture supports active user choice and does not give Apple's own products and services an advantage over those of third parties

3.46 Choice architecture refers to the way that environments are structured to influence the decisions that users make. There is a substantial volume of evidence which shows that choice architecture can impact on the decisions users make and be used to steer them towards a particular course of action.[86]

3.47 We have heard concerns that Apple designs elements of its choice architecture to drive customers towards its own products and services (or those that directly benefit Apple), for example by ensuring prominent placement on the home screen, setting its own products as defaults, embedding prompts to encourage users to switch to its own services, and generally embedding frictions that dissuade users from switching away from these services.

3.48 This makes it harder for app developers competing with Apple's own products and services to compete and grow their businesses, meaning UK consumers miss out on alternative products and services which may better suit their needs.

3.49 The aim of this potential measure would therefore be to ensure choice architecture used on Apple's mobile devices supports open and active consumer choice. We intend to focus on those products and services where we consider there is scope for the highest impact in enabling more open consumer choices, specifically the use cases we identified previously (ie digital wallets and browsers).

3.50 Our work on choice architecture could include measures such as:

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[85] These are the so-called 'custom browser engine In-App Browsers' or 'bundled engine In-App Browsers' where the app developer builds upon its own custom (or forked) browser engine to create an In-App Browsers and has full control over the underlying core rendering engine. See Mobile Browsers and Cloud Gaming, Final Report, paragraph 2.65.

[86] For example, see Online Choice Architecture - How digital design can harm competition and consumers - discussion paper, (CMA 2022).

- The ability to set alternative default apps, and the process required to do so.
- A choice screen at setup and for the chosen app to be prominently placed in the 'application dock' and automatically installed.
- A choice screen for existing users after setup, as well as limiting the number of switching prompts seen by users across multiple access points.
- Requirements around the ease of switching to an alternative solution.
- Restrictions on the number and/or language of any pop-up screens.
- A requirement to provide functionality for third-party apps to see if they have been set as the default.

We will explore the factors likely to be of particular importance for the development of AI services on mobile with a view to considering whether measures are needed such as greater interoperability, and improved choice architecture

3.51 The rapid growth of AI provides a clear opportunity for innovation and investment in the UK, as reflected by the UK Government's AI Opportunities Action Plan.[87] AI services are expected to play an increasingly important and transformational role on mobile devices and are an area of strategic significance for the UK Government.

3.52 Voice assistant applications including Siri are increasingly incorporating AI functionality, with their usage expected to grow over time.[88] We expect Apple to continue to integrate AI services into its mobile ecosystems in a way which seeks to improve its overall proposition, and user experience. For example, Apple Intelligence has incorporated OpenAI (a third party) into Siri and Writing Tools.[89]

3.53 In order to maximise the benefits that AI can generate within mobile ecosystems for both app developers and users, it is vital that UK app developers are able to access the necessary functionality to develop innovative products and services, and that consumers have open choices in

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[87] Government's AI Opportunities Action Plan, 13 January 2025.
[88] See for example: The much-needed reinvention of the voice assistant is almost here; Apple Intelligence is the company's new generative AI offering; and Report: Apple Aims to Release AI-Powered Upgrade of Siri in Spring 2026. See also SMS Proposed Decision in respect of Apple's mobile ecosystem, paragraph 2.134.
[89] See Apple Intelligence - Apple (UK).

their decision as to which services to use. This will ensure that all businesses, including Apple, can compete fairly to deliver the next generation of AI services for mobile, driving the development of new and innovative services which meet real consumer needs. In turn, this also drives investment in the development of AI services for mobile, supporting UK economic growth. We note that Apple has already taken some steps in this regard, for example it recently announced its Foundation Models framework which it states provides app developers with access to Apple's on-device large language model that powers Apple Intelligence.[90]

3.54 We intend to take forward exploratory work to better understand the factors likely to be of particular importance for the development of AI services on mobile, including relevant functionality, and where improvements to choice architecture may be needed.

3.55 We recognise that developing AI services for mobile is an area that is developing at pace, and where Apple itself is competing with wider third parties. Our intention is not to unduly constrain Apple's ability to do this, but rather to ensure this competition is fair, and that Apple cannot use its control of iOS and iPadOS to give itself an unfair advantage. On completion of this exploratory work, we will consider if measures are needed to deliver this.

We will undertake further work to explore the potential for Progressive Web Apps

3.56 PWAs are web applications that are built using web technologies, and are therefore accessible via a browser in the open web, but provide a user experience similar to a native mobile app. PWAs can be installed on a device and run offline, and they offer features such as push notifications and home screen installation, similar to a native app.

3.57 PWAs provide many of the benefits of native apps, and greater levels of support for PWAs could have benefits for UK businesses and users, including:

- Allowing developers to build their apps once, to work on a browser, without having to have an Android-specific or iOS/iPadOS-specific version;
- Reducing UK users' reliance on native app distribution, at least for certain types of app which are well suited to PWAs (eg depending on the specific functionalities used); and

[90] See Foundation Models | Apple Developer Documentation.

- Reducing the potential lock-in effect for UK users, since they would be able to continue to access any content available in PWAs in the same way even if they switched to an alternative mobile ecosystem.

3.58 While we consider the potential benefits arising from improved PWAs could be significant at this stage, there is a relatively large number of changes across a range of stakeholders which would likely be required before any substantial benefits could be realised. We therefore intend to coordinate and facilitate an exploratory programme of work to build our understanding as well as to aid others, with a view to informing potential interventions. This could include:

- Engagement with web and app developers on the technical functionality they require and to ascertain their likely demand should PWAs be viable in multiple jurisdictions/minimum size of market required;
- Meeting with browser providers (including Apple) and web standards bodies to determine what changes browsers may require, and what the implications of this might be; and
- Coordination with international authorities having an interest in this space.

Category 3: Issues that we are not currently prioritising

3.59 This section highlights issues which we do not expect to pursue in the first half of Apple's SMS designation period. These include areas where we do not currently consider there is a case for intervention, or where we would only seek to pursue interventions at a later date should our priority interventions not address the issues as intended. Depending on our analysis at the time, we may revisit the case for intervention in these areas as we update the Roadmap for the second half of the designation period.

3.60 The fact that we are not prioritising measures in these areas does not mean that we have concluded that there are no concerns or that intervention would not be warranted. It is rather a reflection of the need to prioritise the CMA's action and focus on areas where we can have the greatest impact for UK consumers and businesses.

Requiring that users are able to set key third-party apps as their defaults, not only Apple's own apps

3.61 Apple can choose for which services on its Mobile Platform users can select a default app, and on which ones Apple retains this choice (typically selecting its own application). The power of defaults in general is clear. For example,

the CMA's review of online choice architecture stated that there is reliable evidence from the academic literature and competition cases that defaults are one factor that exerts a strong effect on consumer behaviour, as well as affecting competition.[91] Several stakeholders have commented on the importance of default settings on operating system level for their business.[92]

3.62 We have heard concerns that where Apple prevents any alternative defaults being selected by users, this provides its own apps with a material advantage over those of third parties, which in turn may limit incentives and ability for third-party providers to innovate and grow.

3.63 While this is a concern that has been raised with the CMA previously,[93] we understand that, in the UK, Apple now allows users to change their default app for most, if not all, major app categories.[94] Furthermore, defaults are particularly important for certain types of apps where a customer is automatically re-routed to a default service – for example to the default app store to download an app. Therefore, as set out above, we intend to prioritise focusing on the ability for users to set alternative default apps, and the process required to do so, for key use cases (ie digital wallets, browsers), rather than for all types of third-party apps.

Requiring improved data transfer and switching APIs to enable users to more easily switch between iOS and Android ecosystems

3.64 One of the major current difficulties for users when switching between mobile ecosystems is the actual or perceived risk of losing data in the process, for example losing contacts, photos, messages, logins, and music.

3.65 The aim of this intervention would be to promote user switching between iOS and Android by requiring Apple to make APIs available for third parties to develop switching tool apps.

3.66 We are aware of existing tools which aim to support a switch from iOS to Android, eg the "Switch to Android"[95] app which has been developed by

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[91] See Online Choice Architecture - How digital design can harm competition and consumers - discussion paper, (CMA 2022), paragraphs 3.11 and 4.27 – 4.34.
[92] For example, see Epic's ITC response, page 8, 10 and 18; Financial Service Firm B's ITC response, paragraphs 65-68; Proton AG's ITC response, page 2; OWA's ITC response, page 11; and BBC's ITC response, paragraphs 12,13,16.
[93] For example, see Mobile Browser Market Study, Annex G, paragraph 16
[94] For example, see Change the default apps on iPhone.
[95] See Transfer Data From iPhone to Android Seamlessly | Android and Copy apps & data from an iPhone to a new Android device - Android Help.

Google, and "Samsung Smart Switch" developed by Samsung.[96] Google's guide to using its app describes how it is able to transfer data such as contacts, photos, videos, calendar events, messages, apps, music, and notes. It does note that some other data types will not currently transfer to the new device using this service.[97]

3.67 Given the development of these switching tools, and that such measures are less likely to directly contribute to delivering our overarching goal of unlocking innovation for app developers, we do not intend to prioritise work on this in the first half of the designation period.

Requiring Apple to make changes to greater enable mobile network operators to undertake network slicing, and other connectivity measures

3.68 Network slicing refers to the 'slicing' of 5G networks, enabling mobile network operators to offer different 'slices' with different features (such as higher bandwidth and lower latency), for different use cases – for example one slice could be optimised for gaming and another for video calling.

3.69 We have heard concerns that Apple does not fully support network slicing and currently only allows categories of traffic that it defines, rather than custom ones defined by the mobile network operator. An intervention in this space would require Apple to increase the number of categories currently available for slicing and/or fully support the relevant technical protocols. This would allow industry participants such as mobile network operators greater flexibility in how they can shape services which make use of network slicing on Apple's mobile devices.

3.70 We have also heard concerns about Apple potentially restricting mobile operators' access to its mobile ecosystems or their flexibility in offering certain services and products to consumers, including for example eSIMS or other connectivity features as well as the need for Apple to collaborate with mobile operators on setting mobile standards.

3.71 We currently consider that the connectivity concerns raised, including network slicing and eSIMS, relate to potential risks and whether they arise or not will depend on Apple's future conduct. Furthermore, network slicing is at an early stage of market development, and its widespread use (as well as the ability for market participants to offer services relying on it) is dependent on 5G

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[96] See Android Switch - Apps on Google Play.

[97] For example, sign-in information like passwords and accounts, bookmarks from Safari, contacts synced to accounts, health data, voice memos, files; see Copy apps & data from an iPhone to a new Android device - Android Help.

standalone networks being built. We therefore do not intend immediately to prioritise these areas.

Requiring that Apple makes changes to its privacy policies regarding advertising (eg Intelligent Tracking Prevention (ITP), App Tracking Transparency (ATT), and Private Relay)

3.72 Apple introduced ITP on its Safari browser in 2017 as a privacy feature to limit cross-site tracking of users by restricting use of third-party cookies which are used to identify which websites a user has visited.[98] In 2020, Apple extended this to all browsers via its WebKit browser engine.[99] In 2021, Apple introduced a new privacy framework that requires all iOS and iPadOS third-party apps to ask users for permission via a prompt before accessing their device's advertising identifier. Apple refers to this activity as 'tracking'.

3.73 While these policies give Apple device users greater control over their personal data, enhancing privacy and choice, we have heard from certain stakeholders that the way it has been implemented distorts user choice and impacts industry participants which rely on advertising in their business model. For example, on ATT we have heard that the prompt's language and design may push users to not allowing 'tracking' which in turn reduces the app's ability to attribute a sale to an ad, particularly disadvantaging ad-funded publishers. We have also heard that Apple purposefully excludes the combining of data across its own apps from the definition of 'tracking' and therefore does not subject itself to the same restrictions.

3.74 We have also heard concerns in relation to Apple's iCloud Private Relay, a privacy enhancing feature on Safari which results in encrypting IP addresses, and its potential effects on mobile operators, particularly if it were to be turned on by default on Safari by Apple. However, we understand that this is currently only opt-in.

3.75 As set out above, our current focus is to promote greater competition in relation to Apple's Mobile Platform such that UK app developers and innovators developing and distributing content via Apple's Mobile Platform are able to innovate and grow their businesses. We do not consider that addressing issues arising with ATT/ITP/Private Relay is likely to forward this objective as effectively as the areas of potential interventions that we are choosing to prioritise.

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[98]See Safari Privacy Overview; ITP has also been refined and changed over time.
[99] See Mobile Browsers and Cloud Gaming, Final Report, para 4.45(c).

Requiring Apple to provide third-party browsers using WebKit with access to equivalent functionality as that used by Safari

3.76 Apple can and does provide its own browser (Safari) with access to greater functionality than other browsers which use its WebKit browser engine. This limits the ability of these other browsers to compete effectively with Safari, as well as reducing their capacity to innovate and improve.

3.77 The aim of this remedy would be to ensure that browser vendors that use the WebKit browser engine would have greater scope to innovate and introduce new features which improve the user experience.

3.78 We consider that our potential intervention requiring Apple to allow third-party browsers and app developers to use alternative browser engines to Apple's WebKit (Category 2) would provide browser developers with choices around which browser engine to use, including based on their requirements for specific functionality. Furthermore, this potential intervention should apply competitive pressure on Apple to improve its own browser engine offering, or risk losing browsers to alternative browser engines which do offer the relevant functionality. Accordingly, we do not currently intend to prioritise this potential intervention.

Areas where we are still considering prioritisation, subject to international development

3.79 Given the global nature of Apple's Mobile Platform, some of the issues we are considering interact closely with developments in other jurisdictions, in particular US litigation and the Digital Markets Act (DMA) in Europe. In line with the CMA's prioritisation principles and the UK Government's strategic steer to the CMA, we will take appropriate account of measures that have already been taken or are proposed internationally.[100] As a result, we have not yet categorised certain potential interventions we consider to be most impacted by these wider developments.

Other potential interventions to improve competition in app distribution

3.80 In paragraph 3.19 above, we discussed the importance of robust competition in the context of app distribution, and the potential benefits that this could bring to UK app developers and UK users.

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[100] Strategic steer to the Competition and Markets Authority, Department for Business and Trade, 15 May 2025.

3.81 There are a range of additional potential interventions into app distribution that we are considering with the aim of increasing competitive pressure on Apple in this activity, including:[101]

- Requiring Apple to allow alternative app stores on iOS and iPadOS.
- Requiring Apple to allow users to download apps directly from other sources such as an app developer's own website ('sideloading').
- Requiring Apple to allow alternative payment methods for in-app purchases beyond Apple's own in-app payment system.

3.82 Apple currently prohibits alternative payment solutions for in-app purchases, as well as prohibiting alternative means of distributing apps outside the App Store, such as through alternative app stores or sideloading. Measures here would focus on addressing these prohibitions and opening-up greater competition in relation to app distribution, sufficient to ensure that Apple faces competitive pressure to improve the fees, service and offering of its own App Store. As well as removing the current prohibitions, measures could be needed to overcome the network effects involved in app stores, or to consider the user journey if they want to enable sideloading. However, these measures are likely to be complex and their effectiveness more uncertain.

3.83 The DMA has requirements that are similar to each of these potential interventions.[102] In response to the introduction of the DMA, Apple has made various changes to its operations and offering in Europe. However, the European Commission has found Apple to be non-compliant with certain requirements.[103]

3.84 We will therefore keep all these measures in relation to app distribution under review, particularly considering broader international developments as well as considering their interaction with measures to enable steering set out in Category 1.

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[101] We note that the invitation to comment also referenced requiring Apple to allow the advertising of alternative app distribution methods. However, we consider that this has been superseded by our Category 1 potential intervention of requiring that Apple does not prohibit or restrict app developers' ability to provide users with alternative ways to purchase digital goods and services outside of the app store.
[102] See for example Digital Market Act, Article 5(4) and 6(4).
[103] This is Article 5(4). See Commission finds Apple and Meta in breach of the Digital Markets Act.

Action to address the impact on competition arising from the revenue share agreement between Apple and Google

3.85 Chrome and Safari are the two main browsers on iOS and iPadOS. The Information Services Agreement (ISA) between Apple and Google requires that Google pays Apple a share of its advertising revenue from searches on Safari, and a lower but similarly significant share of revenues on Chrome. Accordingly, the financial incentives of Google and Apple to compete in the provision of their Mobile Platforms are significantly reduced by the revenue sharing provisions contained in the ISA.[104]

3.86 The ISA has over time broadened from focusing on the terms of engagement in relation to Google being the default search engine on Safari to incorporating provisions relating to other search entry points, including the Chrome app. Thus, any intervention would need to take account of the interactions between the search and browser activities.[105] Further, for any intervention to be effective, it is likely that it will have to be made on a wider than UK basis.[106]

3.87 Interventions to address these issues are under consideration as part of the ongoing US litigation.[107] We will therefore consider our approach to possible intervention in light of the remedies judgment in the US litigation, expected in the next few months. In line with the CMA's prioritisation principles and the UK Government's strategic steer to the CMA, we will take appropriate account of measures that have already been taken or are proposed internationally.

4. Next steps

4.1 As a next step, we will assess in detail the interventions we have set out as key priorities within this document.

4.2 Should stakeholders have views on the relative order in which we have prioritised interventions, they can be provided via email at mobileSMS@cma.gov.uk. Any such views will be considered alongside

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[104] See section titled 'Impact of Apple's agreements with Google', SMS Proposed Decision in respect of Apple's mobile ecosystem. See also Mobile Browsers and Cloud Gaming, Final Report (chapter 9), which found that these arrangements significantly reduce Apple's and Google's financial incentives to compete in mobile browsers on iOS.
[105] See Mobile Browsers and Cloud Gaming Appendix D, Remedies not taken forward, para 212.
[106] See Mobile Browsers and Cloud Gaming Appendix D, Remedies not taken forward, para 219-226.
[107] See United States, et al. v. Google, LLC.

ongoing engagement with stakeholders, ahead of updating the Roadmap in the first half of 2026.

4.3 We will also invite stakeholder views as part of our consultation on the detail of proposed measures, should we decide to designate Apple with SMS. For Category 1 measures, we are aiming to begin consulting on these following any final decision to designate Apple with SMS, from autumn 2025. If we propose to make changes to the prioritisation of any of the Category 1 areas we currently propose to develop, we will clarify these changes when we launch the initial CR consultations.

4.4 We plan to issue an updated Roadmap in the first half of 2026, reflecting relevant international developments and any comments received from stakeholders. In line with our 4Ps commitment to predictability, we will seek to provide any further clarity we can on our expected areas of work throughout the designation period. To this end, we intend to revisit the Roadmap at the start of the second half of the designation period, and may set out any different measures if we think they are necessary and appropriate, based on our analysis at that time.