Strategic market status investigation into Google's mobile platform

Roadmap of possible measures to improve competition in mobile ecosystems

23 July 2025

Competition & Markets Authority

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 Some numbers have been replaced by a range.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

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 Google'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 2024 in the UK, there were on average [2-3] million apps available each month on mobile devices on the Play Store and [600,000-700,000] app developers with a native app on mobile devices on the Play Store. See Annex A: Market Outcomes (Google), 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 Google'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 Google 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 Google 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 Google 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 Google's mobile ecosystem, we refer to Google's operating system, native app distribution services and its mobile browser and browser engine on mobile devices as Google's Mobile Platform.

[8] SMS Proposed Decision in respect of Google'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 Google'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 Android are largely reliant on distributing through Google's Play Store which has over 90% share of native app downloads on Android.[11] Recognising the importance of the Play Store to app developers, we therefore intend to prioritise consideration of measures here. Our starting point is to look at Google's Play 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 Google. 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 Google takes action in relation to:

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

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[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 Google with SMS, from autumn 2025.

[11] See Annex A: Market outcomes (Google), Figure A.14.

- **Ranking of apps:** Ranks apps in its app store in a fair, objective and transparent manner; and

- **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. Whilst Google allows certain forms of alternative app distribution on its Mobile Platform, we have heard that friction and warning screens discourage the use of these alternatives in practice. More broadly, Google still applies restrictions which dictate how UK developers can reach their customers. We consider that enabling 'steering' such that app developers can steer consumers off the Play Store, for example to complete transactions, is likely to be an effective way to provide UK app developers with more opportunities to improve their products and grow their businesses.

1.11 While the design of any potential steering intervention will need careful consideration, one form of this intervention implemented by Apple in the US[12] appears to be delivering positive benefits. 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.[13] We will need to carefully consider the design of any potential steering intervention, and the interaction with alternative app distribution channels on Android[14] (Category 2).[15]

1.12 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 Play 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

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

[13] 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.

[14] For example, Google has stated that allowing steering creates new security risks as a result of its more open model. See Google's blog The EU's competition rules are hurting consumers and businesses.

[15] 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.

these measures being effective less certain.[16] Many of these measures are included within the Digital Markets Act (DMA) as well as being considered as part of US litigation.[17] We will therefore keep broader measures in relation to app distribution under review, particularly considering lessons from international developments.

1.13   Our other key concern is in relation to the **agreements Google has with mobile device manufacturers** and, combined with Google's control over the Android operating system, the significant influence that these have on the content and services users access on an Android mobile device. We are therefore planning to focus on **choice architecture** to try and ensure users make an active choice as to their content or service provider, and in turn enable third-party app developers to compete on more of a level playing field with Google's own services. We intend to focus in the first instance on key use cases (Category 2). Our key use cases are:

- **Digital wallets**, where there is increasing focus on expanding payment options on mobile devices as well as emerging innovative uses such as for identity verification.[18] The UK is the top-ranking investment destination in Europe for FinTech and accounts for 11% of the global industry,[19] and so ensuring a pro-innovation environment makes this a key use case for us.

- **Mobile browsers,** which act as the gateway to the wider internet on mobile devices with an estimated time spent by UK users of approximately 10 billion hours per year.[20]

- **App stores**, which facilitated [2.8 – 3.4] billion first time native app downloads from mobile device users across the UK in 2024.[21]

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[16] 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.

[17] See Epic Games, Inc. v. Google LLC.

[18] 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.

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

[20] According to Ofcom's Communications Market Report 2024, the average time spent per day on mobile websites via smartphones by UK adults was 27 minutes in 2024. In the same year, there were 56 million smartphone users in the UK. See United Kingdom (UK): number of smartphone users 2020-2029 | Statista. Time spent on mobile browsers has been consistent over time in the UK. Indeed, as published in the Mobile Browsers and Cloud Gaming Final Report, the average UK smartphone user spends around 30 minutes a day in a dedicated mobile browser app. See MBCG FR, paragraph 2.51.

[21] See Annex A: Market outcomes (Google) and Annex A: Market Outcomes (Apple). We note this only includes Apple and Google's app stores, and so would underestimate the true value, likely by a small amount.

1.14   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,[22] and we want to ensure a level playing field and the best services being made available to UK mobile users.

1.15   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, 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.

1.16   In forming our views on priority areas, we have necessarily deprioritised other areas (Category 3).[23] These include emerging areas like mobile network slicing and improved data transfer and switching APIs to enable users to more easily switch between Android and iOS ecosystems. 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.

1.17   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 Google's agreements with device manufactures relating to search. 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.

1.18   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

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

[23] Category 3 interventions are potential CRs or PCIs which we do not expect to pursue in the first half of Google's SMS designation period.

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 Google'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[24] – around 56 million UK consumers[25] – currently have access to a smartphone,[26] and Google's Mobile Platform has accounted for between [30 – 40%] and [40 – 50%] of active mobile devices in the UK in each of the last eight years.[27]

2.2   To access the significant number of UK consumers with an Android mobile device, app developers must develop and distribute their content via Google's Mobile Platform. Ensuring competition works well in relation to Google'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 Google'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 Google 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 Google's Mobile Platform under the digital markets competition regime, should Google 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),[28] to provide additional clarity

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[24] See Smartphone ownership by age 2012-2024 | Statista.

[25] See United Kingdom (UK): number of smartphone users 2020-2029 | Statista.

[26] See UK Mobile Phone Statistics 2024 - Stats Report - Uswitch.

[27] We provide further shares of supply, including for smartphones and tablets separately, in Annex A: Market Outcomes (Google); see Figure A.1.

[28] Digital Markets, Competition and Consumers Act 2024.

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 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;

- Google'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 Google'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.

Google's Mobile Platform and our strategic objective

2.10   Google is a technology company that provides many important services in the digital world, including search, email, video-sharing and mapping. It describes itself as a non-conventional company, looking to organise the world's information and make it universally accessible and useful.

2.11   Google generates the majority of its revenues through digital advertising, and often adopts free-to-user models which are monetised through selling advertising to businesses wishing to access consumers. The most significant of these is its search service which is the subject of a parallel SMS investigation.[29]

2.12   As set out in the introduction, mobile devices are a key method by which users access content and services online. Google is itself a key distributor of digital content and services. In operating its mobile ecosystem, Google is looking to control the distribution of its own content and services.

2.13   Google itself only manufactures a small number of mobile devices. However, its operating system, Android, is deployed on mobile devices operated by other companies, such as Samsung and Motorola. Android is an open-source mobile operating system that powers around 4 billion smartphones in the world,[30] and over [30-40] million in the UK.[31] The operating systems act as an intermediary between hardware and software, enabling software applications (referred to as 'apps') and services to run on the device.

2.14   Google then uses agreements with device manufacturers to influence how its services, like Search, Maps and YouTube, are distributed across these mobile devices. These agreements cover which Google services are pre-installed on the device, where they are placed (for example whether on the home screen), whether they are set as the default, and other promotion. We refer to these as elements of 'choice architecture' since they influence how end-users make choices around the products and services they use. These agreements are highly lucrative for device manufacturers.

2.15   As a result of these agreements, Google can exert significant control over the content and services Android users' access on mobile devices. Whilst Google's agreements do not prevent mobile device manufacturers from pre-installing competing products and services, the promotion of Google's own apps through the choice architecture dictated by these agreements is very powerful. For example, whilst users can use competing app-stores, such as

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[29] See SMS investigation into Google's general search and search advertising services.
[30] See How Many Android Users Are There? Global Statistics (2025).
[31] See Mobile Ecosystem Market Study, Appendix L, para 81.

Samsung's own, and download apps from other sources, Google's Play Store remains the predominant way UK Android users access apps (over 90% share of native app downloads on Android).[32] Similarly whilst users can use competing browsers, Google's Chrome browser remains the predominant way UK Android users access the internet (80%).[33]

2.16   The Play Store and the browser are particularly important as they are the main ways users access additional content and services on their device (beyond what may have been pre-installed as a result of Google's agreements), either in the form of apps, or by browsing the internet, so again are access points for Google's own content and services.

2.17   The large array of apps available on Google'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. As set out above, Google's Play Store remains the predominant way UK Android users access apps and as such app developers wanting to distribute content and services through an app must deal with Google and its terms and conditions for distribution through the Play Store. These cover areas like restricted content, IP protections, privacy and malware, spam and user experience, monetisation, as well as requiring approval through Google's app review process. Google 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.[34]

2.18   Users use a browser to browse the internet. The majority of internet access in the UK is now undertaken through mobile devices,[35] and the browser is particularly important to Google as a traditional access point to its search service.[36] As set out above Google's agreements serve to promote its Chrome browser over those of competing browser providers. Google also has an agreement with Apple, the provider of the main alternative browser to Chrome, which acts to dampen the competition between Google's Chrome and Apple's Safari browser.

2.19   We recognise that Google 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 Google's Mobile Platform. However,

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[32] See Annex A: Market outcomes (Google), Figure A.14.

[33] See Annex A: Market outcomes (Google), Table A.13.

[34] See Play Console Help – Service fees.

[35] See Ofcom Communications Market Report 2024: Interactive data; Online Use – Websites & Apps; Time Spent Online.

[36] See SMS Proposed Decision in respect of Google's mobile ecosystem. See also SMS investigation into Google's general search and search advertising services - GOV.UK.

our concern is that Google 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 Google's controls, and the way these are implemented including through the effect of its agreements and terms and conditions, could be acting as a brake on innovation from app developers.

2.20   The Proposed SMS Decision we are consulting on today sets out the analysis supporting our provisional view that Google has SMS in its Mobile Platform.[37] Through our investigation thus far, we've heard concerns, including:

- That Google's app review process for apps to be distributed on its Google Play 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 Google's Play Store Developer Distribution Terms will apply and whether Google will permit such an app or update.

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

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

- That Google'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). Google places some 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.

- That Google's agreements with mobile device manufacturers for the promotion of Google products and services enable it to exert significant control over the content and services Android users access on mobile devices.

2.21   Our objective is to promote greater competition such that UK app developers and innovators developing and distributing content via Google's Mobile

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[37] See SMS Proposed Decision in respect of Google's mobile ecosystem.

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 Google's business model, recognising the potential for certain benefits to arise for users of Google's Mobile Platform. We also want to ensure Google itself is able and incentivised to innovate and invest in its own platform and services.

International and UK regulatory context

2.22   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 Google LLC* case,** where Google has been found to have illegally monopolised the Android app distribution and in-app payment markets. The judge imposed a series of remedies, including allowing alternative app stores to be listed on the Play Store, requiring Google to share all apps available on Play Store (its 'catalogue') with third parties, and allowing app developers to link outside of the Play Store.[38] Google has appealed this case, and the majority of remedies have currently been stayed pending that appeal.[39]

- **In the EU, Google's compliance with the Digital Markets Act** in relation to its designations as a gatekeeper for its operating system, its app store, and its browser. This places a series of obligations on Google relating to how it operates these activities, such as preventing self-preferencing in ranking and requiring certain interoperability requirements.[40] The European Commission is currently investigating Google's app store policies relating to 'steering' (allowing app developers to direct users away from the Play Store) and has provisionally found these to be non-compliant with the DMA.[41]

- **In Japan, the full implementation of the Mobile Software Competition Act,** required no later than December 2025, under which Google has been designated as a Specified Software Operator.[42]

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[38] See Google Play Store Antitrust Litigation Permanent Injunction, 7 October 2024.
[39] See Court's Decision to grant Google a partial stay, 18 October 2024.
[40] See The Digital Markets Act: ensuring fair and open digital markets - European Commission.
[41] See Commission sends preliminary findings to Alphabet under the Digital Markets Act.
[42] See Japan's FTC to regulate Google and Apple under new smartphone law.

- **In Brazil in 2024, CADE** (Administrative Council for Economic Defense, Brazil's antitrust enforcer) **launched an investigation into Google's Play Store policies**.[43]

2.23   In line with our prioritisation principles and the UK Government's strategic steer to the CMA,[44] 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 Google'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.

2.24   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.[45] We will engage with these bodies to ensure we effectively manage the interactions with their work and benefit from their expertise.

2.25   Finally, there may be interactions with obligations placed on Google as a result of action by the CMA following its investigation into Google's general search and search advertising services. The extent of any interactions will depend on whether Google is designated as having SMS in general search and search advertising services and, if so, the nature of any measures imposed.[46]

The legal framework and our prioritisation approach

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

2.26   Our Roadmap sets out interventions we are prioritising for further work. This does not mean that we will definitely impose these interventions, should

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[43] See Administrative Inquiry Number.08700.002969/2024-61. Key Trends in Antitrust Enforcement, 2nd Semester 2024, Brazil.

[44] 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.

[45] See FCA and PSR report on digital wallets | FCA.

[46] See SMS investigation into Google's general search and search advertising services - GOV.UK; we note areas which may overlap, based on potential issues included in the current Roadmaps, would primarily be choice architecture and original equipment manufacturer (OEM) agreements.

Google 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.

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

2.28 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.[47]

2.29 CRs can only be imposed for the purposes of one or more of the following statutory objectives:[48]

- **Fair dealing**: that users or potential users[49] 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

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

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[47] See Digital markets competition regime guidance, December 2024 (**CMA194**).

[48] Sections 19(5)-19(8) of the Act.

[49] '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).

2.30 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).[50]

2.31 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.[51]

2.32 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.[52]

2.33 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.

2.34 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.[53]

How has the CMA prioritised our work on potential interventions?

2.35 As noted in our published Guidance,[54] and as expanded on in our paper 'Delivering the 4Ps under the digital markets competition regime' published in April 2025,[55] the CMA will have regard to its Prioritisation Principles[56] when

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[50] Section 20 of the Act.
[51] Section 46 of the Act.
[52] See CMA194, paragraphs 3.31 and 4.30.
[53] For example, see CMA194, paragraphs 3.34 and 4.36 – 4.39.
[54] See CMA194, chapter 3 (Conduct Requirements) and chapter 4 (Pro-Competition interventions) for further information.
[55] See Delivering the 4Ps under the digital markets competition regime, 30 April 2025.
[56] See CMA prioritisation principles, 30 October 2023.

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.

2.36 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 Google with SMS, from autumn 2025.

- **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 Google'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.[57]

2.37   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,[58] and our evidence requests to parties. In total we have heard from over 100 parties, collecting views on Google's Mobile Platform position, potential interventions, and how these interventions should be prioritised.

2.38   In this document we have referred to the proposed decision on designation[59] 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.

2.39   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 Google'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.

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

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

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 Google with SMS, from autumn 2025	- Requiring that Google reviews apps to be distributed in its app store in a fair, objective and transparent manner. - Requiring that Google ranks apps in its app store in a fair, objective and transparent manner. - Requiring that Google does not use data collected for the purposes of reviewing apps unfairly, such as for its own app development purposes.
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 Google allows app developers to direct their potential customers off the Play Store (steering). - Requiring that Google's choice architecture in relation to app stores, digital wallets and browsers, supports active user choice and does not give Google'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 half of Google's SMS designation period	- Requiring that users are able to set key third-party apps as their defaults, not only Google's own apps. - Requiring improved data transfer and switching APIs to enable users to more easily switch between Android and iOS ecosystems. - Requiring Google to make changes to greater enable mobile network operators to undertake network slicing, and other connectivity measures. - Requiring Google to make wider changes to its agreements with device manufacturers, beyond those we have otherwise categorised.

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 Google to remove user frictions when using alternative app stores (this could encompass listing these in Google's app store and allowing access to Google's own catalogue of apps). - Requiring Google to change the user experience of downloading apps directly from the app developer's own website ('sideloading'). - Requiring Google to improve its offer of alternative payment methods for in-app purchases. - Action to address the impact on competition arising from search-related OEM agreements, including the revenue share agreement between Google and Apple.

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

3.3   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 Google 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 Google 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 Google reviews apps to be distributed in its app store in a fair, objective and transparent manner

3.4   UK developers looking to distribute an app on Android are largely reliant on being on Google's app store as it has over 90% share of native app downloads on Android.[60] In order to be admitted onto Google's app store, a developer must submit its app for review and approval by Google, repeating this process if it wants to make any major changes or updates. Whilst Google's app review serves a legitimate purpose, failing to be approved, or subsequent removal from the Google 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.

3.5   We have heard from stakeholders that Google's app review is often non-transparent and applied inconsistently. For example, participants in our app developer workshop identified Google's app store as one area where they face substantial difficulty in developing effective commercial strategies as a result of the unpredictability of Google's rules and policies, and the stringency, lack of flexibility, and lack of transparency of its app review process (albeit a number noted that Google is generally better at these than Apple).[61]

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[60] See Annex A: Market outcomes (Google), Figure A.14.
[61] See App Developer Workshop Summary, Mobile SMS Investigations, 24 March 2025.

3.6   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 Google 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 Google's app store. Stakeholders have told us that they would support this measure.[62] 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.

3.7   Interventions in this area could specifically require Google to, for example:

- Review apps that want to list on Google's app store fairly.

- Have a transparent process for app review and provide explanations for delays or rejections.

- Give fair warning when Google materially changes app review process or guidelines, including how Google interprets and applies them.

- Establish an appropriate mechanism for businesses to raise concerns with Google and ensure these concerns are addressed.

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

3.8   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[63] and a body of behavioural science research also supports the importance of high search ranking more generally.[64]

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

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[62] 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.

[63] 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.

[64] 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).

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

3.10   Distortions in ranking of apps would make it harder for UK users to find apps which best meet their needs. Therefore, if Google 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.

3.11   This package of interventions would aim to ensure Google 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.

3.12   Interventions in this area could specifically require Google 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 Google and ensure these concerns are addressed.

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

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

3.14   We have heard concerns that Google 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 Google (and Apple) 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.[65] 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 Google taking advantage of their data.

3.15   This intervention would require Google 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.

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

3.16   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 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 Google allows app developers to direct their potential customers off the Play Store (steering)

3.17   Whilst Google currently allows certain forms of alternative app distribution on its Mobile Platform,[66] we have heard that friction and warning screens discourage the use of these alternatives in practice. Furthermore, we consider that some of its Play Store policies are reducing the competitive pressures that rival companies can apply and restricting the opportunities available to UK app developers.

3.18   Under its existing Google Play Store terms and conditions in the UK, Google places some restrictions on app developers informing users about offers and including links that redirect users outside of Google's app store (referred to as restrictions on 'steering'). This is one mechanism by which Google 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 Play Store entirely, due to concerns over fees, inability to set individual prices, and the loss of the customer relationship.

3.19   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.

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[65] See App Developer Workshop Summary, Mobile SMS Investigations, 24 March 2025.
[66] See paragraphs 3.56-3.61 below for other potential interventions to improve competition in app distributions.

3.20 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 Google's current commission rate by allowing UK app developers to transact with users outside of the Play Store and in doing so to select an alternative payment processing provider (ie not Google). 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.

3.21 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 associated fees and minimal frictions.[67] 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.[68]

- Kindle introduced a new "Get Book" option in its iOS and iPadOS apps, allowing users to purchase books more easily.[69]

- Proton (a provider of high-privacy software products)[70] announced that it would be reducing its prices to US users by up to 30%.[71]

- Patreon (a content creator platform) has rolled out an updated version of its app that now allows users to make purchases via the web.[72]

3.22 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

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

gaming. We will need to carefully consider the design of any potential steering intervention, and the interactions with alternative app distribution channels on Android[73]

3.23 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 Google 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.

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

3.24 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.[74]

3.25 As noted above, Google is able to influence the choice architecture on Android devices through its contractual agreements with device manufacturers, as well as its control of Android. We have heard concerns that Google designs elements of its choice architecture to drive customers towards its own products and services (or those that directly benefit Google), 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.

3.26 This makes it harder for app developers competing with Google'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.

3.27 The aim of this potential measure would therefore be to ensure choice architecture used on Android devices supports open and active consumer

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[73] For example, Google has stated that allowing steering creates new security risks as a result of its more open model. See Google's blog The EU's competition rules are hurting consumers and businesses.
[74] For example, see Online Choice Architecture - How digital design can harm competition and consumers - discussion paper, (CMA 2022).

choice, at the point of first use and on an ongoing basis. 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, namely:

- digital wallets, where we have heard concerns that many Android devices include Google Wallet as part of the device set-up user journey, set it as default and place it on the home screen;

- browsers, where Google's existing choice screen allows a user to install a secondary browser, but does not result in a change in default selection; and

- app stores, where Google's Play Store is usually pre-installed, set as default, and placed in a prominent position on many Android devices.

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

- 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

3.29   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.[75] AI services are expected to play an increasingly important and

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[75] See the Government's AI Opportunities Action Plan, 13 January 2025.

transformational role on mobile devices and are an area of strategic significance for the UK Government.

3.30 Voice assistant applications are increasingly incorporating AI functionality, with their usage expected to grow over time.[76] We expect Google 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, Google describes its AI service, Gemini, as being "deeply integrated into Android" allowing it to interact with any app you have open on the device.[77]

3.31 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 their decision as to which services to use. This will ensure that all businesses, including Google, 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.

3.32 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.

3.33 We recognise that developing AI services for mobile is an area that is developing at pace, and where Google itself is competing with wider third parties. Our intention is not to unduly constrain Google's ability to do this, but rather to ensure this competition is fair, and that Google cannot use its control of Android, 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

3.34 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

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[76] See for example: The much-needed reinvention of the voice assistant is almost here; Google's blog: Our vision for building a universal AI assistant; Introducing Gemini 2.0: our new AI model for the agentic era; see also SMS Proposed Decision in respect of Google's mobile ecosystem, paragraph 2.141.
[77] See Google blog Google AI: How Gemini makes Android more helpful.

and run offline, and they offer features such as push notifications and home screen installation, similar to a native app.

3.35   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

- 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.

3.36   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 Google) 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

3.37   This section highlights issues which we do not expect to pursue in the first half of any SMS designation period, should Google be designated in respect of its Mobile Platform. 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.

3.38   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 Google's own apps

3.39   Google can choose for which services on its Mobile Platform users can select a default app, and on which ones Google 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.[78] Several stakeholders have commented on the importance of default settings at operating system level for their business.[79]

3.40   We have heard concerns that where Google 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.

3.41   While this is a concern that has been raised with the CMA previously,[80] we understand that, in the UK, Google now allows users to change their default app for most, if not all, major app categories.[81] 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, app stores), rather than for all types of third-party apps.

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[78] See Online Choice Architecture - How digital design can harm competition and consumers - discussion paper, (CMA 2022), paragraphs 3.11 and 4.27 – 4.34.
[79] 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.
[80] For example, see Mobile Browser Market Study, Annex G, paragraph 16
[81] For example, the ability to set an alternative default digital wallet was introduced in Android 15 in 2024; see 3 Android 15 features that could make your mobile life much easier | TechRadar.

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

3.42 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.

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

3.44 Google has developed a centralised portability tool called "Takeout", as well as a Data Portability API both of which are available to end-users in the UK.[82] Google describes these services as:[83]

- Takeout: a centralised solution that provides access for end-users so that they can download a copy of their data to their own device or export to a cloud storage service. It states that this can be used for a wide range of use cases, including to migrate files and data to a new service or device.

- Data Portability API: a service which enables end-users to provide third parties with direct access to their Google data.

3.45 We are also aware of existing tools which aim to support a switch from Android to iOS, eg the "Move to iOS"[84] app which has been developed by Apple. However, Apple's guide to using this app notes that there are some limitations in this process.[85]

3.46 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.

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[82] During 2025 Google has continued to introduce new features to this API; EU Digital Markets Act (EU DMA) Compliance Report Non-Confidential Summary, March 2025; pages 20 onwards.

[83] See EU Digital Markets Act (EU DMA) Compliance Report Non-Confidential Summary, March 2025; page 21.

[84] See Move from Android to iPhone or iPad – Apple Support (UK).

[85] For example, it states that 'Make sure all of your content has been transferred. Music, books and PDFs need to be moved over manually. Need to get the apps that were on your Android device? Go to the App Store on your iOS device to download them'.

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

3.47   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.

3.48   We have heard concerns that Google 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 Google 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 Google's mobile devices.

3.49   We have also heard concerns about Google 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 Google to collaborate with mobile operators on setting mobile standards.

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

Requiring Google to make wider changes to its agreements with device manufacturers, beyond those we have otherwise categorised

3.51   As set out above, Google licenses Android to numerous mobile device manufacturers (original equipment manufacturers, or OEMs). In addition, Google licenses many of its own products and services, like Search, Chrome and Play. Many of these licensing agreements also include terms whereby Google pays the OEM in return for promotion of these services, for example pre-installing the app(s) and/or placing them in prominent positions on the device's home screen. As a result of these agreements, Google can exert significant control over the content and services Android users access on mobile devices.

3.52   The evidence the CMA has gathered thus far suggests that these distribution agreements are complex and contain implications for a wide range of market participants, not only OEMs and mobile network operators but also potentially for browser vendors, providers of digital wallets and AI firms. In particular, we have heard concerns that the payments are an important revenue source for OEMs, and disrupting these could have wider negative effects, such as increasing the price of handsets for UK customers.

3.53   As set out above, we intend in the first instance to focus on choice architecture in specific use cases, which should address some of the concerns arising from these agreements. This should ensure users have open choices on the products and services they use on their mobile devices. Whilst this action may have an impact on Google's agreements with OEMs, we do not currently intend to prioritise direct action in relation to the agreements themselves, in general.

3.54   We note that there is one specific area where we have categorised the relevant provisions in OEM agreements differently, namely search-related provisions.[86] Furthermore, we may revisit the prioritisation decision not to intervene in the agreements themselves more widely in the future, in particular, having considered the effectiveness of improvements to choice architecture on any issues identified.

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

3.55   Given the global nature of Google'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.[87] As a result, we have not yet categorised certain potential interventions we consider to be most impacted by these wider developments.

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[86] Currently uncategorised as an area where we are still considering prioritisation, subject to international development; see paragraphs 3.62-3.66 below.
[87] Strategic steer to the Competition and Markets Authority, Department for Business and Trade, 15 May 2025.

Other potential interventions to improve competition in app distribution

3.56   In paragraph 3.20 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.

3.57   There are a range of additional potential interventions into app distribution we are considering with the aim of increasing competitive pressure on Google in this activity, including:[88]

- Requiring Google to remove user frictions when using alternative app stores (this could encompass listing these in Google's app store and allowing access to Google's own catalogue of apps)

- Require Google to change the user experience of downloading apps from other sources such as directly from the app developer's own website ('sideloading')

- Requiring Google to improve its offer of alternative payment methods for in-app purchases beyond Google's own in-app payment system.

3.58   In relation to alternative payment methods for in-app purchases, we consider Google's User Choice Billing proposition a positive development. However further measures could be necessary to enable effective competition for in-app purchases, for example changes to the commercial terms on which it is offered and the scope of app developers who can benefit from it.

3.59   In addition, in relation to alternatives to distribution through the Play Store, whilst Google enables such alternatives, additional measures could be necessary to enable alternative app stores and/or sideloading to provide an effective competitive constraint. For example, measures to try and 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.

3.60   The DMA has requirements that are similar to each of these potential interventions.[89] Furthermore, following the Epic Games Inc vs Google LLC litigation, a US court imposed remedies covering many of these same

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[88] We note that the invitation to comment also referenced requiring Google 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 Google 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.

[89] For example, see Article 6(4) and Article 5(7).

points.[90] Most of the remedies, including all those mentioned above are currently stayed pending an appeal.[91]

3.61 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 2.

Action to address the impact on competition arising from search-related OEM agreements, including the revenue share agreement between Google and Apple

3.62 The majority of internet access in the UK is now undertaken through mobile devices,[92] and the browser is particularly important to Google as a traditional access point to its search service.[93]

3.63 Chrome and Safari are the two main browsers on iOS and iPadOS. The Information Services Agreement (ISA) between Google and Apple 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.[94]

3.64 We note that 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.[95]

3.65 Furthermore, as a result of Google's other OEM agreements, Google Search continues to be pre-installed, placed prominently and set or selected as the

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[90] See Google Play Store Antitrust Litigation Permanent Injunction, 7 October 2024.

[91] See Court's Decision to grant Google a partial stay, 18 October 2024.

[92] See Ofcom Communications Market Report 2024: Interactive data; Online Use – Websites & Apps; Time Spent Online.

[93] See section titled 'Impact of Google's agreements with Apple', SMS Proposed Decision in respect of Google'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.

[94] See SMS Proposed Decision in respect of Google's mobile ecosystem, para 4.70 and Mobile Browsers and Cloud Gaming Final Report, chapter 9.

[95] See Mobile Browsers and Cloud Gaming Appendix D, Remedies not taken forward, para 212.

default search provider on most Android search access points; and choice architecture does not make it easy for consumers to change search provider.

3.66   Interventions to address these issues are under consideration as part of the ongoing US litigation.[96] We will consider our approach to possible intervention in these areas 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 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 Google with SMS. For Category 1 measures, we are aiming to begin consulting on these following any final decision to designate Google 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.

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[96] See U.S. and Plaintiff States v. Google LLC, Revised Proposed Final Judgment, 7 March 2025, pages 7-8.