

# Submission to the Competition and Markets Authority on its Provisional Decision to Designate Google Search Under the Digital Markets, Competition and Consumers Act

**DuckDuckGo is an Internet privacy company** that helps people take back control of their personal information. We believe the best way to protect people's personal information from hackers, scammers, and data hungry companies is to stop it from being collected at all. That's why millions of people [choose DuckDuckGo over Chrome and other browsers](#) to search and browse online, making us the **third most popular search engine in the UK**. Our built-in search engine works like Google but never tracks your searches. And our browsing protections, like ad tracker blocking and cookie blocking, help stop other companies from collecting your data. Our browser and extensions are designed to be easy to use and are available for all major platforms.

We appreciate the CMA's thorough and compelling provisional decision to designate Google Search with Strategic Market Status (SMS). The CMA's evidence base is rigorous, well-reasoned, and paints an undeniable picture: **Google continues to hold a stranglehold over general search in the UK, backed by an entrenched network of default positions, immense scale advantages, and closed data ecosystems**. This dominance is both historically rooted and structurally maintained.

To that end, we are writing to request the **CMA takes immediate action to adopt the necessary conduct requirements to simultaneously address the intertwined distribution and scale advantages** that underlie Google's anticompetitive dominance. Interventions are needed to open up the distribution channels closed by Google via a web of exclusive placement deals and self-preferencing practices. At the same time, these must be paired with data sharing interventions that can fill the enormous scale gap that Google has built over the years by excluding competitors from distribution points.

**Further delay before taking strong action will not only allow harmful search market dynamics to continue but deprive consumers and businesses of the benefits of innovation and competition in search in the UK.**

## A Global Consensus on Intervention

**Regulatory authorities and courts around the world are converging on the same conclusion: Google's conduct requires multiple overlapping interventions to address the harms it caused.** In the ongoing landmark case *United States v. Google*, a U.S. court determined that Google created a reinforcing feedback loop that ensures a "perpetual scale and quality deficit" for search competitors. The CMA has made similar conclusions. In the same vein, competition authorities in the European Union have taken enforcement action under the Digital Markets Act (DMA), while jurisdictions such as India,

Japan, and Australia are actively investigating or implementing pro-competitive frameworks to curb search gatekeeping and improve consumer choice.

This global momentum illustrates that **the challenges the CMA seeks to address are not isolated to the UK—they are systemic and widely acknowledged**. The CMA, however, is best placed to address the impact to UK consumers, businesses and the economy. The CMA must pursue complementary interventions simultaneously if there is any hope of changing current market dynamics. They should address both the distribution side (choice screens and exclusive distribution deals) and the supply chokepoints (licensing of Google search results and access to click-and-query data). Together, these remedies will effectively counteract Google's scale advantage which would not otherwise be achieved if pursued in isolation. Our view is that the CMA's work in this regard would complement and align with international efforts and, conversely, that international efforts alone aren't going to fix this broken market in the UK.

## The Need for Ambitious Conduct Requirements

**We believe the CMA's evidence base provides a compelling mandate to act, and we urge the Authority to match its analysis with equally ambitious enforcement.**

Google's dominance in general search, if left unaddressed, will only be further cemented and extend into key emerging markets like conversational AI.

Indeed, the CMA's own analysis of search queries (Annex B) shows Google consistently **securing over 90% of all general search queries in the UK from 2018 to 2024, with mobile device share reaching as high as 98% in some months**. In December 2024 alone, Google processed between 15–20 billion UK queries, compared to Bing's 500–1,000 million—a scale differential of more than 15-fold. On mobile, no other provider even crossed the 5% query share threshold, demonstrating Google's near-total dominance in the most widely used channel for search. Furthermore, Google's share of UK search ad revenue also exceeded 90% of the total search advertising market over the same period, generating between £10–20 billion in 2024 alone. Bing, the second-largest provider, by comparison had £500–600 million in search ad revenue. Google's monopoly translates into **staggering costs for UK businesses and consumers** – the CMA showed that Google's excess profits feed into the nearly £400 per year that Google search advertising costs households in the UK – through higher prices. UK business entities spent the equivalent of more than £33,000 per advertiser for search advertising on Google last year; if competition was working well, these costs would be lower. This is without accounting for job losses and lost investment opportunities in the UK resulting from Google's grip over an ever-increasing set of vertical search services.

Crucially, **the CMA's examination of query volumes also shows that emerging generative AI tools do not present a meaningful competitive constraint**. In late 2024, ChatGPT accounted for approximately 90–100% of AI assistant query volume, yet its usage remained below 5% of the volume of Google Search queries. Further, Google's AI Overviews were shown in more queries than all AI assistants combined by December 2024. Other AI tools—including Google Gemini, Copilot, Claude, and Perplexity—each

registered less than 500 million queries monthly, a small fraction of the billions search queries Google receives. Moreover, Google retained dominance in high-frequency, monetizable queries such as navigation, shopping, and simple information, while AI-generated responses were mainly used for complex tasks that generate less monetization from queries. The CMA's analysis found that users still relied overwhelmingly on traditional search apps or browser bars for everyday queries—interfaces in which Google is mostly the exclusive preset default.

In order to address the above, the conduct requirements must be robust, future-proofed, and targeted at the very mechanisms by which Google maintains its grip on the market: **addressing not only how Google treats its rivals, but also how its default positioning, data scale, and control over distribution points serve to entrench its power.**

## Choice Screens Are Necessary but Not Sufficient

**Google's position has only strengthened from 2018 to 2024, despite the presence of a free search engine choice screen on Android since 2021.** This indicates that choice screens, on their own, can have limited effectiveness to counteract Google's competitive imbalance (in particular, choice screens that are poorly designed and implemented). And yet, the CMA proposes to prioritize choice screen interventions, and choice screen interventions only. Supply side interventions, which the CMA's own analysis proves how urgent they have become, are left hinging on the decision of a U.S. court and an indeterminately lengthy foreign legal process.

**Free choice screens for both search engines and browsers are necessary.** They're the most effective and fairest way to undo Google's stranglehold on distribution points via exclusive placement deals and self-preferencing practices. **Effective**, because if well designed they're asking users a question rarely before asked – which search or browser default they want. And **fair**, because they're the best way to give search engines and browsers an equitable chance to compete for the users' preference. We recommend that the CMA builds upon the wealth of evidence amassed thanks to the DMA's choice screens to finally bring intuitive choice architectures to UK users [REDACTED]:

- **Design:** the DMA choice screens' design is superior to that of the UK legacy Android choice screen. For DuckDuckGo, in countries most comparable to the UK in terms of brand recognition, they likely resulted in improved selection rates of **+40%** [REDACTED]. The CMA should consider additional effectiveness-enhancing interventions, such as never placing Google at the top of the choice screens (resulting in **+75% to +89%** alternative selections per our study in [REDACTED]).
- **Rollout:** the DMA choice screens haven't been properly rolled out, which largely explains their limited impact. The CMA should ensure its choice screens are shown to the whole Google or Chrome user base on dominant browsers or operating systems, under a transparent, predictable timeline. They should be shown to the whole Google or Chrome user base regularly, for instance on an **annual basis**

(corresponding to, e.g. major OS updates). As we observed in the EU with the re-surfacing of the browser choice screen on iOS, this will significantly improve the choice screens' impact as well as consumer satisfaction [REDACTED].

- **Access points:** unlike the DMA choice screens, the CMA choice screens should properly impact all pre-set access points which steer users to Google Search or Chrome. This should explicitly include Gemini, which the CMA's own analysis (Appendix F) identifies as a growing general search access point.

Further, in order to be effective, a choice screen must go hand-in-hand **with simple, one-click default switching mechanisms and persistent settings controls**. Users should be able to return to their search engine default setting easily and update it without needing to dig through complex menus. Search engines must be allowed to programmatically link users to this setting in a seamless way, both on Android, and on Chrome – removing friction and giving consumers true control. None of this has been enforced under the DMA, causing user frustration.

Removing friction to switching should start **with immediately banning the most egregious Google practices**, such as that of **slapping Chrome users with a "Change back to Google Search?" popup** after they install a search extension which changes the default search engine away from Google. This scare screen has cost us 50% of our extension user base on Chrome (**Annex 4**).

The design and rollout of an effective choice screen in the UK should not be left to Google. As shown with the non-compliant rollout of the DMA choice screens so far, it is clear that Google cannot be trusted to do so. The CMA is best placed to ensure choice architecture interventions work effectively and put users at the center.

Even the best-designed choice screens cannot, on their own, overcome Google's overwhelming advantages in scale and data. Without addressing these advantages, the CMA risks solving one side of the equation while leaving the other side unsolved.

## Data Remedies Must Be Prioritized Together With Choice Screens

**DuckDuckGo urges the CMA to adopt both search results licensing and click-and-query data sharing as necessary, complementary interventions to choice architecture interventions.** By closing up the distribution channels to meaningful competition, Google has significantly widened the scale gap over the years between itself and other search engines. Google seeing over 90% of all searches means Google is the only search engine that sees all of the less common - or "long tail" - queries. It makes it more challenging for the other search engines to deliver the precision users expect for all queries. If all the CMA does is open up the distribution channels via choice screens or restrict Google's ability to sign exclusive default distribution deals, Google will still be allowed to enjoy the fruits of that significant scale gap, and it will still have an enormous competitive advantage as a result of its past conduct. In the short term, it means that

choice screens and easier switching may yield disappointing results, because the precision challenge will not have been addressed.

As [we've previously written](#), **both click-and-query data sharing and search results licensing are important** for challenger search engines to improve relevance, expand coverage, and build up their own search infrastructure step-by-step.

Requiring Google **licenses its search results under fair terms** will provide competitors results for critical "long-tail" queries where data is the sparsest, for example, obscure articles, businesses, and products. This would also enable us to understand how Google would lay out pages for such rare queries. While we wouldn't lay them out exactly the same way, it would ensure we wouldn't be missing anything. It would also provide access to search modules we lack today because of our scale. Overall, search results licensing - or "syndication" - jumpstarts competitiveness in the market with high-quality alternatives that can near immediately begin differentiating on ranking algorithms and other content, start gaining more users, and work towards independence by reinvesting revenue and analyzing anonymous data from those users. Additionally, it accelerates building those long-term scaled indexes, assuming that data from the search syndication license can be stored and used for that purpose. In our case, with over 100 million searches a day, there's potential for a lot of data we could use. Syndication deals already exist, including from Google, so the infrastructure is already there - the terms, however, don't allow for meaningful differentiation today. The CMA will need to inject in Google's terms the flexibility and fairness required to enable competition. By definition, however, a search results licensing intervention would only cover those queries that we see.

This is where **anonymous click-and-query data sharing** comes in as it would provide insights on all of the queries that Google sees, save those removed for anonymization purposes. Namely, data on the way users interact with the results presented to them for a given query, like clicking on things or otherwise interacting with the page. Studying these interactions is critical for rankings because a search engine doesn't really know what is the most relevant until it gets user feedback, such as what users are clicking on, how long they are spending on those pages, or thumbs up or down. Google sees orders of magnitude more interaction data than the other search engines because of its vastly greater query volume, which it can then use to determine how to better lay out search results, especially for "long tail" queries. Enabling competition on the search engine market in the UK therefore requires to close that gap with mandated data sharing. The CMA should ensure Google applies anonymization methods that meaningfully prevent user re-identification while keeping useful information on less common queries.

**The CMA should not wait for the outcome of the ongoing *United States v. Google* case to do these interventions.** First, that case will take several more years to resolve, during which Google's dominance will only deepen. Second, any court-issued remedy will apply only to U.S. users and U.S. data which will not be adapted to a UK audience. There is no reason for the CMA to delay action when UK-specific interventions are both urgently needed and technically feasible. Much of the infrastructure required to implement these interventions already exists - what's missing is the regulatory mandate to unlock access on fair terms. The CMA is best placed to drive this forward.

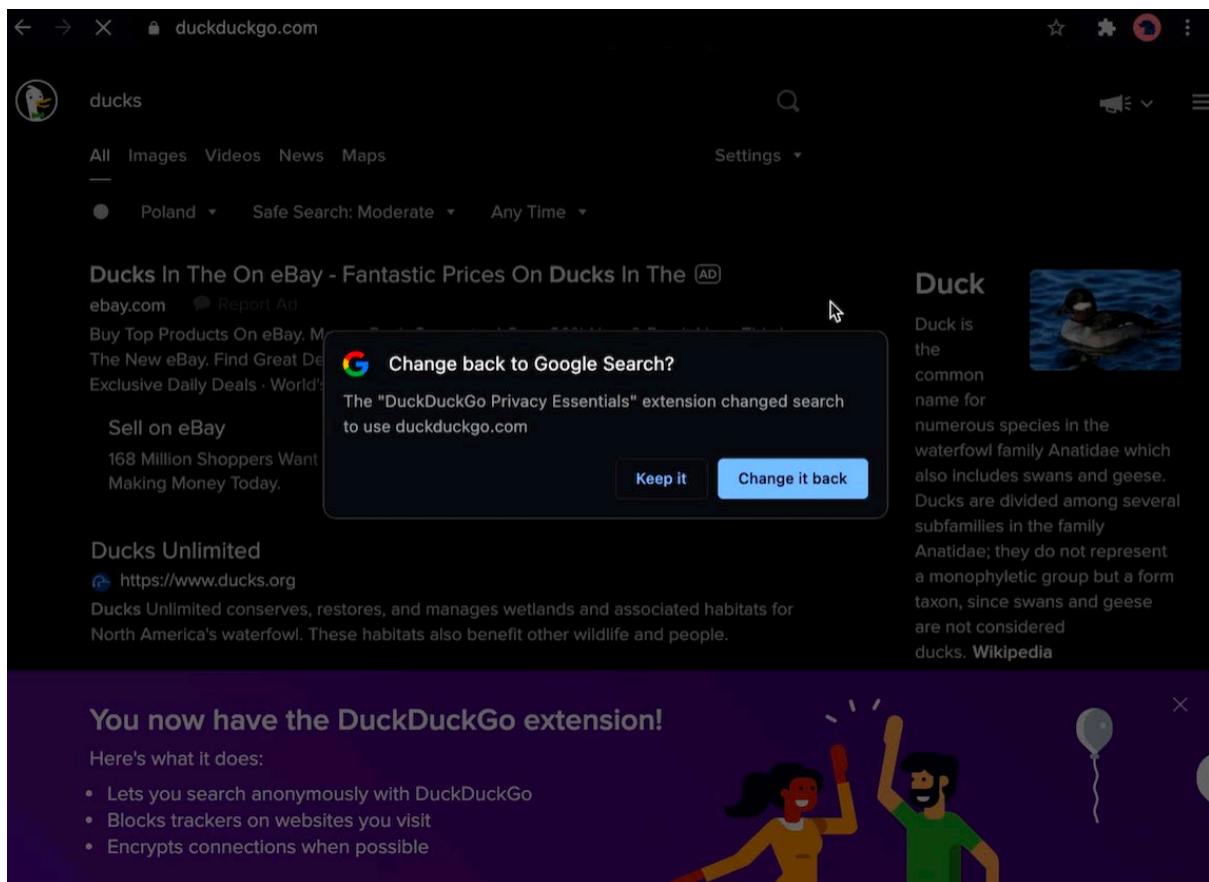
## Conclusion

The CMA's provisional decision confirms what challengers like DuckDuckGo have long experienced: meaningful competition among search engines cannot emerge unless the structural advantages protecting Google are addressed head-on. **We welcome the CMA's designation of Google Search under the DMCCA and now call for equally ambitious interventions to follow.**

This must begin with the adoption of strong, swift, and far-reaching conduct requirements. In addition to user-facing interventions, the CMA should prioritize remedies that directly address the underlying data and distributional asymmetries that perpetuate Google's dominance by pursuing click-and-query data sharing and search results licensing interventions together with choice architecture improvements. Only a dual approach—combining meaningful user empowerment with robust structural and data access obligations—will be sufficient to enable search engines competition in the UK and support UK growth.

## Annex 4 - The Chrome “change back” popup for search extensions - explained

Chrome shows an unnecessary “change back” popup (fig. 1) when installing an extension that changes the search default.



**Fig.1:** this pops up in Chrome for desktop at first search after installing most extensions that change the search default

In early 2025, Chrome's global ["change back" popup policy](#) was adjusted. The policy now states that extensions whose sole purpose is to change the search default won't be affected by the popup. Before that date, the popup was shown to all extensions changing the search default, with no exemption.

### Why is this exemption policy meaningless?

Google claims that this extension policy is meant at preventing abuse, e.g. a gaming extension which would covertly change the search default.

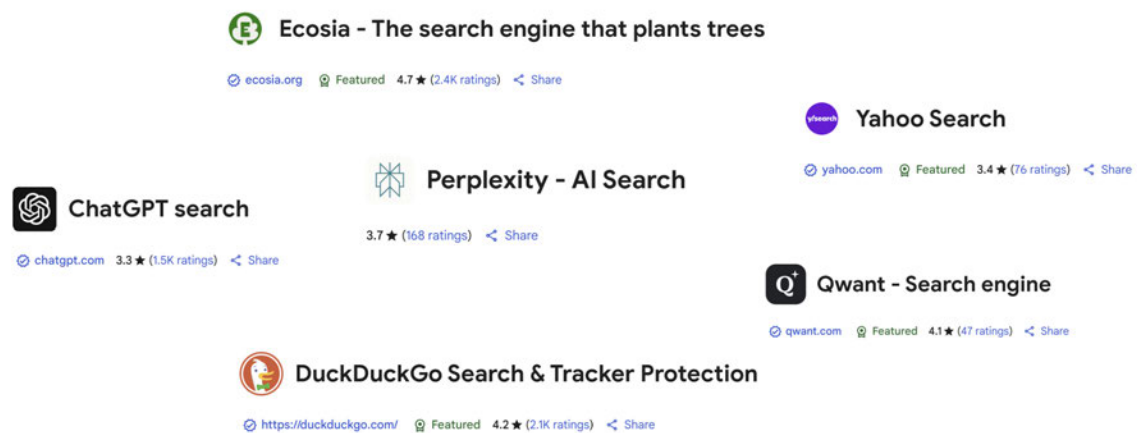


- [REDACTED]
- [REDACTED] :
- The policy has been designed in the narrowest possible terms: if the extension does anything else than changing the search default URL, the popup will show. To avoid the popup, search extensions are prevented from doing basic things, such as:
    - open a welcome page after the extension is installed.
    - set the default home page to the search website.
    - doing privacy-respecting audience measurement.
    - offer custom URL bar behaviors when a keyword is used (Chrome's [Omnibox](#) feature).
    - show content in a side-panel next to specific sites, or when triggered by the user (Chrome's [Side Panel](#) feature). Particularly relevant for AI search where they can put a chat session next to page content.
    - add items to the right-click menu (Chrome's [ContextMenus](#) feature): to Google's [own example](#) linked from their docs, Google uses this API to allow switching search locale.
  - At a higher level, this prevents search competitors from differentiating. For instance, our differentiator is privacy. With the current policy, we are unable to add critical aspects of our offering, which includes not only anonymous search, but also blocking third-party trackers as the user browses, among others.

The very narrow policy explains why not a single popular search extension, all tested on July 1, 2025, is exempt from triggering the change-back popup. This is despite all these extensions clearly displaying that they change the search default (**fig.2**) - we invite the CMA to test for themselves on Chrome:

- [DuckDuckGo](#)
- [ChatGPT search](#).
- [Ecosia](#)
- [Bing](#)
- [Perplexity Search](#)
- [Yahoo](#)





**Fig.2:** some popular extensions' denomination on the Chrome Web Store (1 July 2025)

This is a very serious issue - one that would immediately boost contestability if fixed : over time and repeated prompts **about 50% of our user base deactivates the extension** by clicking "change back to Google". Other extensions changing the search default agree with us - see this recent [post](#) by Perplexity's CEO.

### So what should be done about it?

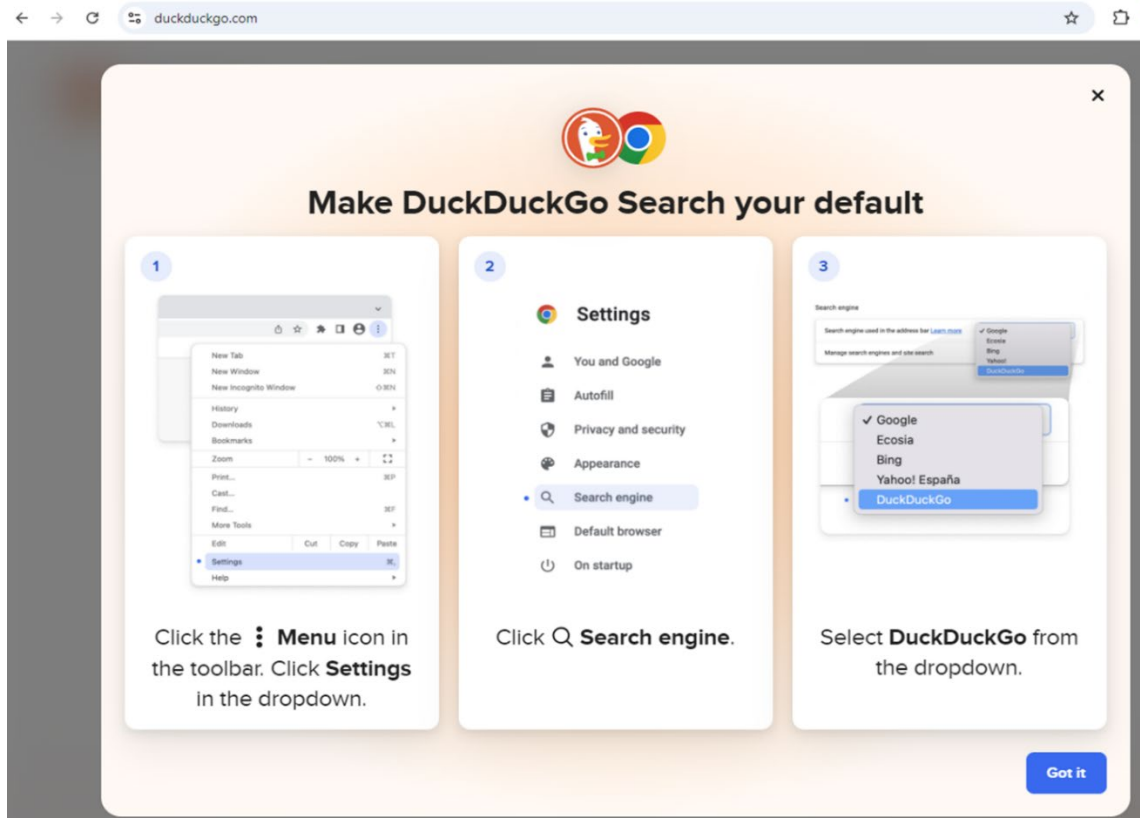
Google should simply remove this popup for extensions that clearly label that they're going to change the search default.

Per Chrome's web store guidelines, all of the search extensions listed above clearly label in their denomination and description that they are search engines, and change the search default.

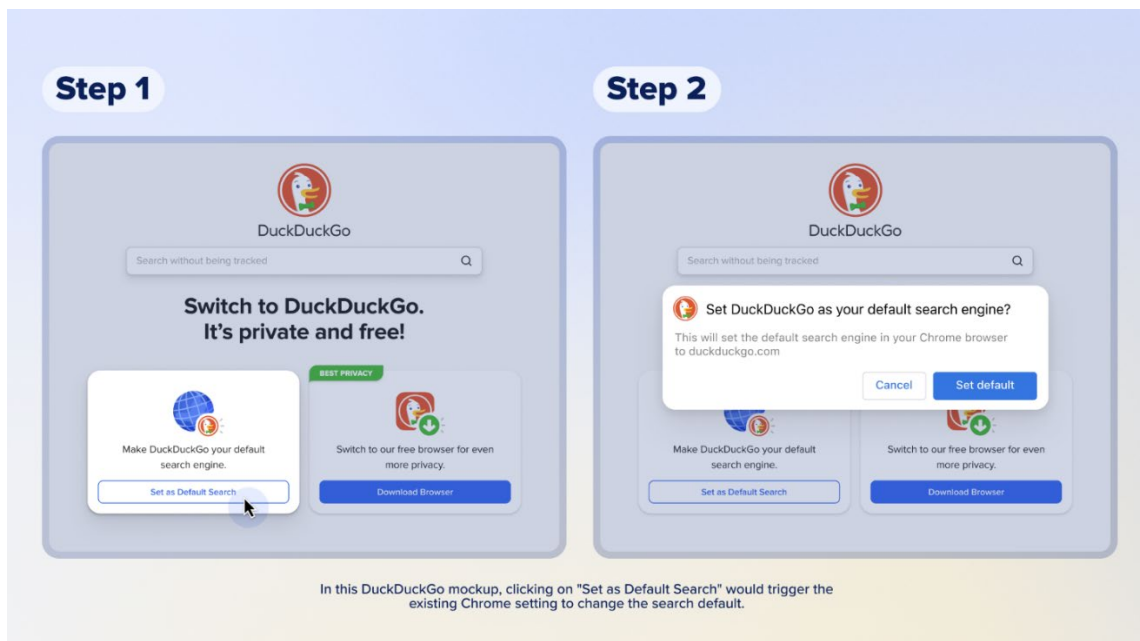
### Why is the extension so important?

The extension is the only way for a search website to change the browser's search default at the user's request, without the user having to find the appropriate menu in the settings by themselves. With the "change back" popup having such a bad impact, we resorted to showing the below explainer (**fig. 3**) to users when they click "set as search default" on [duckduckgo.com](https://duckduckgo.com/). Obviously, this isn't a good user experience.

Besides removing its extension "change back" popup, Google should make it easy to switch by allowing search websites to redirect (deeplink) to the appropriate setting, as proposed in **fig. 4**. This could improve our conversion rate (rate of users setting DuckDuckGo as default after clicking on the button) by **up to 100%**.



**Fig. 3:** we show this explainer to users who click “set as default search” on duckduckgo.com



**Fig.4:** DuckDuckGo’s « “click-to-switch” » mockup on Chrome.