

# Competition and Markets Authority's Strategic Market Status investigation into Apple's mobile platform

## Response from Mobile UK

August 2025

### About Mobile UK

1. Mobile UK is the trade association for the UK's Mobile Network Operators ("MNOs") – BT/EE, Virgin Media O2, and VodafoneThree. Our goal is to realise the power of mobile to improve the lives of our customers and the prosperity of the UK.
2. As mobile increasingly becomes the device of choice for running daily life both at home and at work, customers want improved coverage and greater capacity. Mobile UK's role is to identify the barriers to progress and work with all relevant parties to bring about change, be they Government, regulators, industry, consumers, or citizens more generally.

### Proposed SMS Decision

3. Mobile UK welcomes the opportunity to respond to the Competition and Markets Authority's ("CMA") consultation on its proposed decision on designating Apple's Mobile Platform<sup>1</sup> with Strategic Market Status ("SMS") ("Proposed Decision").
4. Mobile UK agrees with the CMA's provisional conclusion, set out in paragraph 1.18, that Apple's Mobile Platform meets the SMS conditions. However, Mobile UK believes that the description of the relevant digital activities should clarify that connectivity functionality is intermediated by operating systems, by bringing connectivity functionality in scope of the definition of the operating system (which aligns with the CMA's intentions in its roadmap of possible measures where it does recognise connectivity measures). We have set out our views on this below.
5. As the CMA identifies in its Proposed Decision, "*almost all adults in the UK currently have access to a mobile device*" and consumers use Mobile Platforms on their mobile devices to "*access, view and engage with digital content and services.*"<sup>2</sup> Mobile UK has consistently submitted that the ability for consumers to interact with their devices in this

---

<sup>2</sup> Paragraph 1.7.

way is almost entirely derived from connectivity to the device, whether that is Bluetooth, wi-fi, satellite, cellular, or other technology.

6. The connectivity portion of Mobile Platforms is therefore a key part of the overall competitive landscape, as it is a critical component of how consumers use mobile devices and a driver of innovation, resilience and growth. Indeed, this can be seen in the importance of network connectivity to the UK economy and consumers, which is itself recognised by the UK Government. Its recently published 10-year strategy for UK Infrastructure identifies the essentiality of mobile networks (including the adoption of 5G),<sup>3</sup> and its Modern Industrial Strategy 2025 highlights Advanced Connectivity Technologies (“ACT”) such as 5G standalone, 6G and satellite communications (and the networks they underpin) as “essential for industry, government and for the citizens”.<sup>4</sup> Further, economic modelling found that the delivery of a highly resilient, nationwide high-capacity network could unlock up to c.£230billion in economic benefits for the UK by 2035,<sup>5</sup> and similarly, an analysis by PwC forecasts that 5G technology is set to contribute an additional c.£40 billion to UK GDP by 2030.<sup>6</sup>
7. For this competitive and innovation function to be fulfilled, and for the UK economy and consumers to subsequently derive maximum benefit from choice and innovation on mobile devices, the interface with the providers of connectivity must be open and transparent and not be controlled or determined by the platform operators.
8. With this in mind, Mobile UK considers that the description of Apple’s digital activities should explicitly recognise the network connectivity functionality – particularly given the importance of this functionality to how consumers use their devices, as well as to the UK economy. Mobile UK therefore proposes that paragraph 4.62 of the Proposed Decision should be amended as indicated in red:

*Based on Apple’s current business model, we provisionally conclude that the above digital activities include:*

- (a) *for the Smartphone Operating System: (i) the operating system currently known as iOS; (ii) any middleware acting as an intermediary between hardware and software, such as Apple’s Metal Framework; (iii) supporting functionality that allows Siri to interact with other apps on iOS devices, such as the Sirikit and App Intents framework, and Siri Suggestions; and (iv) all other functionality intermediated on the mobile device by the operating system; including functionality which is key for digital wallets such as access to the NFC chip and including network connectivity functionality;*

<sup>3</sup> See, e.g., [CP 1344 – UK Infrastructure: A 10 Year Strategy](#), page 59.

<sup>4</sup> [Industrial Strategy: Digital and Technologies Sector Plan](#), pages 32-33.

<sup>5</sup> [Driving Growth: The £230bn opportunity of improved mobile networks](#).

<sup>6</sup> [The global economic impact of 5G](#).

*(b) for the Tablet Operating System: (i) the operating system currently known as iPadOS; (ii) any middleware acting as an intermediary between hardware and software, such as Apple's Metal Framework; (iii) supporting functionality that allows Siri to interact with other apps on iPadOS devices, such as the Sirikit and App Intents framework, and Siri Suggestions; and (iv) all other functionality intermediated on the mobile device by the operating system, including network connectivity functionality;*

9. Mobile UK provides its comments on the CMA's roadmap of possible measures under separate cover. However, Mobile UK considers that it is most appropriate, efficient and proportionate to bring connectivity in scope of the operating systems at this stage, to avoid the need for the CMA to assess whether further designation is necessary before the CMA could put measures in place relating to connectivity. This is also consistent with the CMA's roadmap of possible measures for Apple, where it does recognise connectivity measures.