

Search SMS: Post Proposed Decision Roundtable on Choice Architecture

11 August 2025

Introduction

As part of our Strategic Market Status (**SMS**) investigation into Google's general search services, we held a series of roundtables and bilateral meetings with affected industry stakeholders to seek feedback on the proposed SMS Designation Decision and the Roadmap of potential interventions.

The event was chaired by the CMA Director leading the SMS investigation and attended by CMA staff including the Project Director, Digital Markets and the case team. This note summarises the views expressed by 9 businesses who attended the roundtable. We will consider these as part of the body of evidence we gather during the SMS investigation.

Update on the Investigation

The CMA shared an update on the investigation, the timeline leading up to the statutory deadline for issuing a Final SMS decision notice on 13 October 2025 and summarised the reasoning for its Proposed Decision.

The CMA outlined the scope of the digital activity of 'general search services' as set out in the proposed decision and articulated what products and features it considered would fall within scope, including AI Overviews and AI Mode. It also provided a brief summary of the [Roadmap](#) setting out its priorities for potential interventions should the CMA designate Google as having SMS. The CMA confirmed that it intends to publish an updated version of the Roadmap in early 2026.

Focus on choice screen design and implementation

The main part of the discussion focused on potential interventions relating to Google's choice architecture. The CMA explained that the purpose of these potential interventions would be to ensure that consumers can easily make an informed choice and switch between search providers. It was keen to hear views on existing choice screens such as the choice screen Google introduced in response to the EU's Digital Markets Act (**DMA**) (the **DMA Choice Screen**), eligibility criteria, and frequency of the display of choice screens.

One participant stated that the initial choice screen Google rolled out in 2019 was of limited impact. They explained that whilst the updated DMA Choice Screen was better, there was still room for further improvement. The participant noted the roll out had been opaque, and that a significant proportion of the Android user base hadn't seen the choice screens at all. They also noted that users only saw the choice screen once and they considered it should be displayed more often, such as around once a year. They added that Google's products should not be placed in prominent positions on the choice screen in order to encourage the discoverability of alternatives.

Another business stated its experience of choice screen interventions to date had been disappointing. They noted that Google had recently changed the criteria relating to the choice screen, which had made their experience even worse [as a smaller search engine provider].

The business advocated for not focusing on a 'switch' between default services for users, but for 'choice' between services at the point of search. The business provided the example of the Firefox and Vivaldi browser which enabled users to choose their provider at the point of search, and that this was a positive mechanism for businesses and consumers. The business suggested that the ability to switch search engine at the point of search might have a similar pro-competitive effect to search engine choice screens. Another business highlighted its browser product contained this feature and enabled users to select the most appropriate service for a particular query; however, they added that this feature would likely need to be supported by a choice screen intervention.

A participant shared that in other jurisdictions Google had conducted industry workshops on choice screens before they were implemented, which explained how the choice screen would work, and look. The participant viewed this as a positive experience, as it provided stakeholders advance notice, enabling them to forward plan and ask questions. The participant also stated the CMA should ensure that the timing of any choice screen is not disruptive to the user. They also considered that the CMA should ensure that any choice screen intervention in the context of the Search SMS investigation takes account of, and align with, any choice screen intervention arising from the Mobile SMS investigation. In particular, the participant considered it was important that any browser choice screen is displayed prior to a search engine choice screen, as otherwise the brand recognition of Google Search could impact users' browser choice.

One business shared an alternative view, stating that although an initial industry workshop on choice screen in the EU was good, it had resulted in changes being made further down the line to the choice screens as part of an opaque process which business was not notified of. They said there had no further consultation with stakeholders, or the opportunity for stakeholders to meaningfully present views on these changes.

The CMA was asked if it could expand on its intentions for a potential remedy, and whether it intended to be prescriptive regarding the design of the choice screen or whether it would set high level principles and require industry to develop the exact design. The CMA stated that both approaches were being considered, and one of the purposes of engagement like the roundtable was to establish what were the necessary elements for an effective intervention.

What access points to Search should be covered?

The CMA explained that in the existing DMA and Android choice screens only two Google-owned access points are included, Chrome and the Search widget. The CMA asked participants if a choice screen should be shown on any other access points.

Two participants expressed the view that, as a matter of principle, all access points preset to Google search should be covered by a choice screen. They stated that there was an issue with the choice screen in the UK and EU as Google remains the 'underlying' default. These businesses highlighted that the CMA should consider on-device search as an additional access point, as this feature is preset to Google on many devices and is becoming more important and convenient to users. They also noted that the CMA needed to be aware of the ongoing developments regarding AI services and consumer habits in search. One of these participants suggested that the CMA should consider whether choice screens should cover default AI assistants as an access point, re-directing any searches the AI assistant conducts to the chosen search provider.

Another participant sought clarity on the connection between the published Roadmaps for the Search SMS investigation and the Mobile SMS investigation regarding AI Assistants. The participant stated that AI Assistants might be included as part of a choice screen for general search services, as well as being subject to a separate choice screen concerning AI Assistants

more broadly across a mobile OS. The participant submitted that in either case, any intervention would require careful study and attention to market developments. The participant also expressed the view that it would not be proportionate or effective to implement a choice screen regarding non-Google owned access points.

The CMA explained that it was useful to understand the interaction between the two investigations from a business perspective, and that the CMA wanted to ensure it was consistent with its approach to choice architecture across the regime.

A participant stated that in its view the question of which access points would be covered by the choice screen was related to interoperability, and the ability of third-party services to integrate with all access points. They explained that third parties need access to relevant APIs to access all search access points to make choice genuinely free and fair.

Eligibility criteria for inclusion on choice screen

The CMA explained that currently only general search services are present on the UK search engine choice screen and the CMA was considering whether generative AI powered search services should also be eligible to appear. The CMA shared some potential criteria for third party eligibility and asked for views.

A participant asked if the CMA was aware of any research that indicated whether there should be a specific number of options available on the choice screen. The CMA stated it was not clear whether there was a specific figure at which users faced choice overload. The CMA noted that in the choice screen DMA up to 12 options are displayed and there has not been any evidence of choice overload or fatigue.

A business responded noting that, in the context of a browser choice screen, it understood that users preferred a broader set of options, and that they believed this would help to increase contestability and diversity of choice. The business proposed that a potential solution would be to have a choice screen display 12 options but have a greater number of services that could be displayed on a rotating basis, for example 12 of 15 options could be displayed on a given choice screen. Additionally, another business expressed a concern that the potential criteria set out by the CMA did not include any diversity criteria regarding the underlying search engine.

Regarding the selection criteria for participation in the choice screen, one participant explained that under the DMA that the number of downloads in the Google Play Store was used to determine participation in the choice screen. However, they explained that they believed StatCounter information would be a better solution, as this measures actual usage and is less open to potential manipulation. The participant added that focusing on downloads disadvantages single use applications, and is a barrier for new entrants to the market.

Another participant supported and expanded on this point, explaining that market share is better measured by usage rather than app downloads. They flagged however that StatCounter may under-measure services with a focus on privacy as these services can block tracking as part of privacy measures. They therefore supported the use of Cloudflare data instead. Regarding the inclusion of AI Assistants/Services in the choice screen, the participant stated that they supported the idea that in principle any service that searches the world wide web and returns results including links to third-party sites should be eligible for inclusion in a choice screen.

How frequently should the choice screen be shown?

The CMA asked participants for views on how frequently a choice screen should be shown, and whether users should be able to trigger a choice screen at any time.

A business expressed the view that a choice screen should be shown on device setup, users should be able to trigger the choice themselves, and that this trigger should be easily accessible within the device settings. They added that apps should also be able to direct users to this setting from within the app. The business also stated it had seen increased uptake of alternative services by users the second time a choice screen was presented, and that user appetite for seeing a choice screen increased after seeing it on more than one occasion.

Post device setup choice architecture

The CMA explained it was considering whether the user journey to switch search engine defaults on Android and other Google-owned access points could be simplified, and if Google should include search as a default app category on Android devices. The CMA asked participants for views on these topics and if the user journey could be improved post device setup.

A participant explained it would be supportive of being able to set a device level default for search within Android, however they highlighted the experience of choice interventions on iOS and that it was important to ensure any device level default was easily accessible and decreased the number of clicks to change the default compared to the existing method. Further, the participant expressed that it was also important that the user could change the default service on a device level from within the service itself.

Another participant agreed that any setting to change the device level default must be accessible within the device settings and that users should be able to change the default setting from within the service. They stated that a default search engine API would be a vital step to ensure this was an effective solution. The participant added it had seen significantly greater uptake of its browser product than its search widget, and that it believed this is due to there being a more complex user journey to change widgets compared to setting a default. The participant stated that it believes that allowing an in-app prompt to change a device level search default could lead to a similar opt-in rate to that observed for in-browser prompts to change default search engine.

Limits on 'switch back' prompts

The CMA explained that it had heard concerns regarding 'switch back' prompts from Google-owned search access points and asked participants whether or to what extent there should be limits on 'switch back' prompts.

One participant viewed this potential measure as complementary to ensuring users can make an effective choice to choose their search engine. They considered that the only purpose of a switch back prompt is to protect a provider's market position, and that a frequent display of the choice screen provides users with sufficient opportunity and reminders to switch service.

A further participant stated that they considered that Google should be prohibited from displaying 'switch back' prompts, such as the prompt that is displayed in Chrome where the user has selected an alternative search engine. They considered that this is a part of ensuring users can make an effective choice and expressed a view that users should be able to change the search default from a search engine's website without the need to install a Chrome extension. They stated that Google has introduced a policy in Chrome for search engine extensions that would mean that no switch back prompt would be shown after their installation, but that the requirements of the policy are overly restrictive. They stated that as of July 2025, no popular search extension meets those requirements and therefore do trigger a switch back prompt after their installation by a user.