

# **CMA'S STRATEGIC MARKET STATUS INVESTIGATION INTO GOOGLE'S MOBILE PLATFORM**

## **Summary of Oral Representations made by Google on 05 September 2025 from 1pm to 5pm**

### **Introduction**

1. The purpose of the meeting was to provide an opportunity for Google to make oral representations to the Digital Markets Board Committee sub-committee on its proposed decision (**PD**) in respect of its current strategic market status (**SMS**) investigation into Google's Mobile Platform.

### **Overarching points**

2. Google said that it was disappointed with the CMA decision to provisionally designate Google in regard to its mobile platform. Google said that it is the second player in the UK in mobile platforms after Apple, and that the CMA's concerns and third-party submissions focus on Apple not Google.
3. Google said that the proposed decision dismisses evidence against Google having substantial and entrenched market power (**SEMP**).
4. Google said that the market is driven by rapid, fundamental changes in how UK consumers and developers use mobile services, driven in part by AI. It said that these trends illustrate the dynamic competition that is already taking place in the UK market, for example, new entrants like Perplexity and OpenAI launching browsers and the growth of cross-progression gaming. Google added that this is only expected to increase in the future, so the forward-looking assessment of having substantial power for five years is not satisfied.
5. Google said that the CMA's proposed conduct requirements for mobile are narrow and can be addressed pragmatically without a designation. Google cited proactive steps it has taken in the past to address the CMA's potential concerns, without the need for formal intervention, such as introducing search choice

screens on Android devices and alternative billing on Play. It also said that additional regulatory processes would cause delays, added costs, and heavy compliance burdens. It said that it can work constructively with the CMA without a formal designation to help address perceived concerns.

### **Mobile – SEMP assessment**

6. Google said that it lacks substantial market power because Apple exerts strong competitive pressure. On entrenchment, Google said that the CMA must show power will persist for at least five years, but technological shifts (such as AI), changing consumer demand, and new entrants make this unlikely (e.g., alternative browsers, third-party app stores, and the rise in cross progression gaming). It said that the market outcomes are inconsistent with the CMA's suggestion that Android, Play, Chrome or Blink have substantial and entrenched market power.

### *Competition for end users*

7. Google said that the Android platform has very high levels of satisfaction among developers and users, and this reflects Google continually innovating and improving the Android platform. Google said that customer satisfaction with the Android platform should be a fundamental consideration for the CMA's decision.
8. Google said that the CMA's own consumer survey suggests that substantial switching takes place despite the fact that users are overall very satisfied with Android. Additionally, Google said that the CMA's finding that users are disengaged does not align with how people actually interact with mobile devices – they know what to expect and can easily seek out the alternative mobile platform if they wish, as shown by the results of the CMA's survey.

9. Google said that there are high switching rates between Android and iOS, particularly compared to competitive consumer markets, indicative of close competition. Google said that the CMA has dismissed the switching rates as being low, without providing a benchmark that it would consider a high switching rate.
10. Google said that contrary to the PD, Google is not focused only on lower priced devices. Android is an input that supports devices at all price points. Apple and Android overlap in their competition for premium users. There are also including OEMs (like Samsung) who compete in this space using the Android platform. Google said that this does not discount the fact that there is really high competition across the non-premium segment, including because iOS has been moving down the price point by launching cheaper devices, marketing older devices at lower prices, and offering refurbished devices.
11. Google said that the competition in the premium segment drives innovation and benefits for all users because Android is one platform, and Google does not discriminate between premium and non-premium devices when innovating for Android.
12. Google said that its rate of innovations on Android is extremely high, compared to other devices and these innovations ultimately drive benefits to consumers. Google referred to its submission of a long list of innovations on Android over the last few years.
13. Google said that the CMA had committed the 'toothless fallacy' in wrongly considering competitive constraints to focus only on a subset of consumers. Google said that what matters for competition is the responsive users at the margin, and the CMA has erroneously excluded Android users who might switch to Apple.
14. Google said that it has a strong incentive to win and retain premium users on Android compared to losing them to iOS, this is notwithstanding the Information

Services Agreement (**ISA**). Google presented an analysis that calculated the value to Google of having a user on Android compared to having them on iOS and explained its methodology.

15. Google said that as a result of its incentive to compete with Apple, it has continuously launched products, devices and software across all Android devices. Google said that it has very visibly and openly criticized Apple, including in its latest ad campaigns. Google argued that the platforms watch each other very closely and try to keep up and leapfrog each other constantly. On this basis, Google said that it competes very fiercely with Apple and this is not affected by the ISA.

#### *Competition for developers*

16. Google said that it disagreed with the CMA's conclusion in the proposed decision that Play has SEMP.
17. Google also said that it disagreed with the CMA's view that both the Apple App Store and Google Play Store are considered must-haves, Google said that in the CMA's consumer survey, only one in four developers said that they need to be both on Play and the App Store. Google said that a lot of features are being launched on Apple first and Android later. Google said that this affects the overall perception of the Android platform and how it competes, and this is not a niche problem in that major apps (WhatsApp, Instagram, Snapchat, and Duolingo, and popular games like Roblox and Clash of Clans) have all publicly announced that they are launching features and services on either Apple exclusively or Apple first.
18. Google said that Play's market share is low and is falling. Google said that, while its market share has fallen since 2020, it has increased the value of Play over time, by consciously and continuously innovating

19. Google said that it does not only face competition from Apple and other app stores and consoles, but also faces competition on its own platform. If Google wants to retain these developers, it has to innovate. At the same time, Play's fees have dropped by 20 per cent. Google further argued that developers are satisfied with Play.
20. Google said that a lot of developers develop across platforms, usually not only Android and Play, but also for the web, consoles and PC. A user may start using an app on one non-mobile device and move onto another mobile device – the digital item you buy on the PC carries over to the mobile device for instance. The product teams try to improve the platform to ensure that developers prioritise Play in development.
21. Google said that unlike Apple's App Store, which is the only app store available on the Apple platform, Google faces intense intra-platform competition as a result of Android's open nature. For example, from third-party app stores on Android, including those that are preinstalled through agreements with OEMs or OEMs' first-party app stores, and that two-thirds of Android devices already come with at least two app stores preinstalled. Google argued that for the next few years, there will be even more competition because more app stores will be pre-installed.

### *Competition in browsers*

22. Google's said that its investments in Chromium and Blink promote the open web and competition via lowering browser development cost while maintaining flexibility for browser developers to innovate on top of open-source code.
23. Google said that in the space of only a few years, numerous new browsers have entered the market in the UK with unique selling points, including Arc, Chatloop and Perplexity, which the PD wrongly dismisses.

24. Google said that AI is poised to fundamentally change how we all use the Web, as AI technologies have the potential to insert themselves as an additional layer above the browser, and therefore to fundamentally change how users interact with browsers. Google said that some browsers have already started integrating AI technology directly into their browsers, and it would not assume that the significant players today are going to be the significant players of tomorrow.
25. Google said that the proposed decision fails to engage with this evidence, which is at odds with the notion that Chrome holds entrenched market power.
26. Google also said that users are aware of different browsers on Android and empowered to select the browser best suited to their needs. Finally, Google noted that OEMs remain free to enter into agreements to preinstall and set as default first-party or third-party browsers, and Chrome is only set as the default browser on a minority of UK devices.

*Digital activity scoping and grouping*

27. Google said that it disagrees with the CMA's grouping approach to designation because each activity serves a different purposes and they are not supplied as a package. Google said that there were policy reasons for not grouping as the CMA does in the proposed decision, because it is important for companies to have certainty and predictability about which products are in scope of the designation and the ability to have SEMP reassessed in the future. Google submitted this is not possible where market developments in one product area are mitigated by SEMP findings in others.