Consultation: User Choice Conduct Requirement

Google's general search services

28 January 2026

Contents

1. Introduction

1.1 This consultation document sets out our proposals for a CR to improve the choice architecture[1] provided by Google in relation to default search services to enable consumers to make informed and effective choices and promote greater competition among search providers (**User Choice CR**). We include the following:

(a) Section 2: Aim of our User Choice CR;

(b) Section 3: Our proposed User Choice CR and Interpretative Notes;

(c) Section 4: Effectiveness of our proposed User Choice CR;

(d) Section 5: Provisional proportionality assessment for the User Choice CR; and

(e) Section 6: Questions for consultation.

1.2 Our proposed measures cover the design of a 'choice screen' presented at first use and at regular points thereafter; and the routes through which consumers can switch their default search provider at any time. For more information about the digital markets competition regime, Google's designation with SMS in general search and the framework for considering CRs, see the 'Introduction to the consultation' document published separately.

[1] 'Choice Architecture' refers to the way that choices are presented to consumers and how they influence decision making. As defined, see: Centre on Regulation in Europe, Choice architecture for end users in the DMA (2023), page 5. For a detailed review of the impact of online choice architecture on consumer choice and competition, see: CMA, Evidence review of Online Choice Architecture and Consumer and Competition Harm (2022), paragraph 1.6, both accessed by the CMA on 25 January 2026.

Google's existing choice architecture in distribution of general search

The role of defaults

1.3 Users receive search services through 'access points'. These include, for example, web browsers, search apps and search 'widgets'.[2] Access points often have search services set as the default, so they work for consumers when they are first used. This means that defaults are important distribution channels for entry and expansion in search.

1.4 As described in our SMS Decision, Google has control of, or influence over, a range of important access points to search – its own web browser (Chrome) as well as mobile devices that run on its Android operating system used by mobile phone manufacturers (also known as 'Original Equipment Manufacturers' (**OEMs**)), mobile network operators (**MNOs**) and browser vendors.[3]

1.5 There are two types of defaults in search services:

(a) System defaults: the default search service in factory settings chosen by OEMs, MNOs or browsers vendors. Google has entered into high-value distribution agreements to incentivise OEMs, MNOs and browser vendors to set Google Search as the system default search provider on third-party access points. For example, Google Search is the default search service on the Safari, Samsung Internet, Firefox and Opera browsers.[4]

(b) Chosen defaults: the default search service chosen by users either through a choice screen or settings. In 2020, Google introduced an Android Choice Screen allowing users at device setup to choose a search service.[5]

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[2] A Search widget is a customisable shortcut on an Android home screen that lets a user start a web search instantly without opening an app.
[3] Strategic Market Status investigation into Google's general search services: Final Decision (SMS Decision), 10 October 2025, paragraph 5.173.
[4] Strategic Market Status investigation into Google's general search services: Final Decision (SMS Decision), 10 October 2025, paragraphs 5.173(b) and 5.173(c).
[5] Android, 'About the choice screen', last updated 12 June 2023, accessed by the CMA 16 October 2025 Android Choice Screen.

1.6 Google's position of influence has meant that Google Search is often set as the system default on Google-owned[6] and third-party access points.[7] There is considerable evidence showing that, once defaults are set, users rarely change them. For example, [a large majority] of Chrome users on Android have Google Search set as their default, while [a large majority] of Chrome users on macOS/OSX and [a large majority] of Chrome users on iOS/iPadOS also have Google Search as their default.[8,9] Similar effects of defaults can be seen on third-party browsers: for example, approximately [✂]% of Firefox mobile and desktop users in the UK have Google Search set as their default.[10] These effects also persist for other search services beyond Google: for example, on desktop devices, approximately [✂]% of Edge users have Bing set as their default search provider.[11]

1.7 Whilst as a result of the introduction of choice screens, Google Search is no longer automatically set as the default search provider on key access points for users including the Search widget and Chrome browser on Android devices in the UK, data provided by Google shows that in every month since April 2020, a large majority of UK users have selected Google Search as their default when presented with the Android Choice Screen.[12]

1.8 Despite the introduction of choice screens, Google continues to enter into distribution agreements with OEMs, MNOs and browser vendors that incentivise the pre-installation and prominent placement of Google Search on Android devices.[13] As the focus of this proposed CR is Google's choice architecture, these distribution agreements would not be covered by our User Choice CR. However, we will consider our approach to Google's distribution

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[6] Google's owned access points are the Chrome application, Google Search Application, Search widget, Circle to Search, Text to Search, and Google Lens on Google Pixel devices and some Android devices. Google's consolidated response to the CMA's RFI. Google's consolidated response to the CMA's RFI. Google's response to the CMA's RFI.

[7] See for example, Online platforms and digital advertising market study, July 2020 (DAMS), paragraphs 3.97-3.100 and Appendix H.

[8] Google Search is the default search provider on Chrome on desktop, but some desktop users (for example, [a small minority] of macOS/OSX desktop users) have changed to a different search provider. Source: CMA calculations based on Google's consolidated response to the CMA's RFI. To note, this figure is an estimate based upon a sample of pseudonymous Chrome clients. Strategic Market Status investigation into Google's general search services: Final Decision (SMS Decision), 10 October 2025, paragraph 5.173(c).

[9] Jachimovicz et al, When and why defaults influence decisions: a meta-analysis of default effects, January 2019, accessed by the CMA on 25 January 2026.

[10] Firefox's response to the CMA's RFI.

[11] Microsoft's response to the CMA's RFI.

[12] Strategic Market Status investigation into Google's general search services: Final Decision (SMS Decision), 10 October 2025, paragraph 5.173(c).

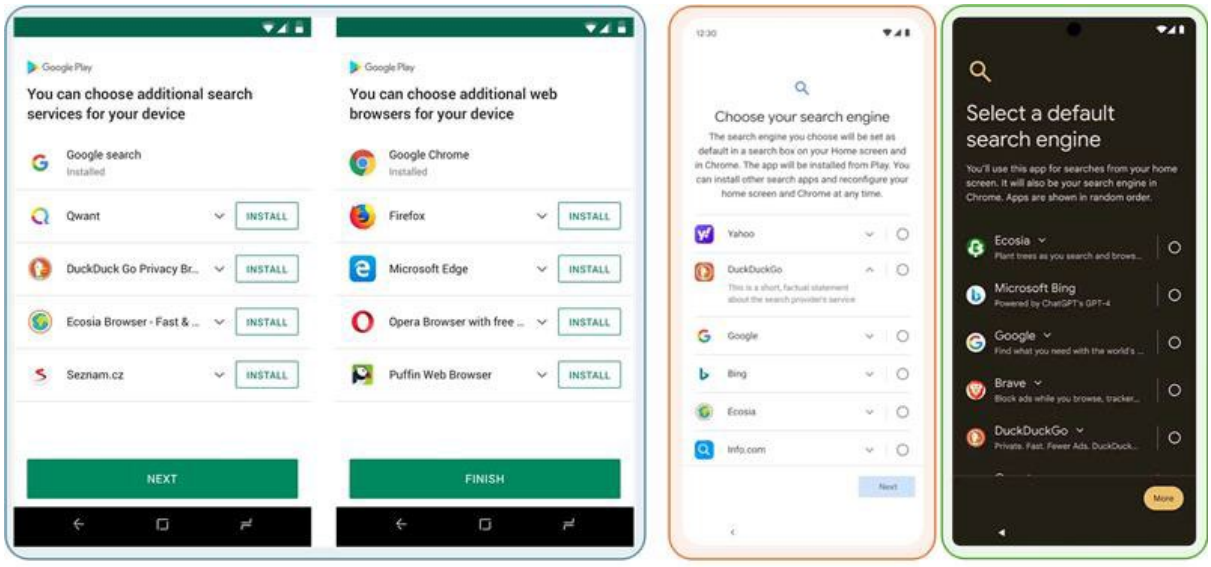
[13] Strategic Market Status investigation into Google's general search services: Final Decision (SMS Decision), 10 October 2025, paragraph 5.173(c).

agreements subject to consideration of the implications of the judgment in the US search litigation.[14, 15]

Existing choice screens

1.9 Google currently displays three choice screens to users that are relevant to our proposals. Two are voluntarily displayed to some UK users of Android smartphones and tablets (known as the **Dual Choice Screen** and **Android Choice Screen**), and one is shown to users across the European Economic Area (**EEA**) (known as the **DMA Choice Screen**) as shown in Figure 1 and summarised in Table 1.

Figure 1. Screenshots of Dual (left), Android (middle) and DMA (right) Choice Screens



Dual Choice Screen | Android Choice Screen | DMA Choice Screen

Source: For Dual Choice Screen, for Android Choice Screen and for DMA Choice Screen

[14] Strategic Market Status investigation into Google's general search services: Roadmap of possible measures to improve competition in search (2025).

[15] This includes agreements with OEMs across Android and Apple's iOS devices.

Table 1. Summary of Google's existing choice screens

	Jurisdiction and basis	When shown	Coverage	Access points covered	Search providers included
Dual Choice Screen	UK users, introduced voluntarily in April 2019 (but largely replaced by Android Choice Screen). Replaced by DMA choice screen in EEA since March 2024.	When user first opens Play Store, possibly on device reset, unless already shown the Android Choice Screen at device set-up.	All new Android smartphone and tablet devices (apart from Google Pixel devices) that have pre-installed the Google Search app and / or the Chrome application.	Search app downloaded but default not changed on any access points.	General search service, being one that allows users to search for information across the entire Internet (5 providers displayed).
Android Choice Screen	UK users, introduced in March 2020 voluntarily after the European Commission's *Google Android* decision.[16] Replaced by DMA choice screen in EEA since March 2024.	Initial device set-up, possibly on device reset.	All new Android smartphone and tablet devices (apart from Google Pixel devices) where the Google Search application is pre-installed.	Search widget, Search app and Chrome app.	General search service, being one that allows users to search for information across the entire Internet (up to 12 providers displayed).
DMA Choice Screen	EEA users, introduced in March 2024 pursuant to Article 6(3) of the DMA.	Initial device set-up, possibly on device reset and when opening a Chrome app at later stage.	All new Android devices, Chrome on iOS/iPadOS mobile devices and desktop devices in the EEA.	Search widget and Chrome app (on Android devices) and Chrome (on iOS/iPadOS and desktop).	General search service, being one that allows users to search for information across the entire Internet (up to 12 providers displayed).

Source: For Dual Choice Screen: Google request for information,[17] for Android Choice Screen and for DMA Choice Screen

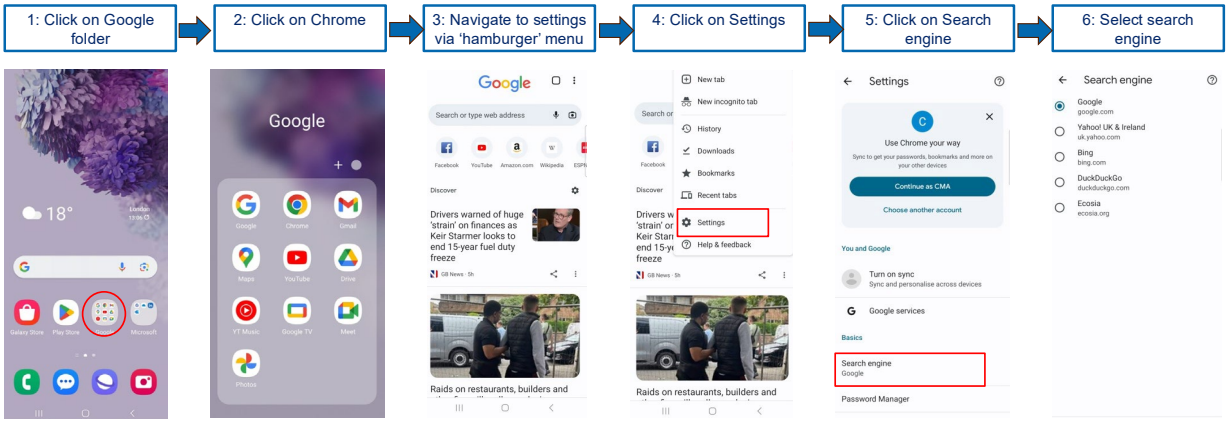
[16] Android, 'About the choice screen', last updated 12 June 2023, accessed by the CMA 16 October 2025.
[17] Google's consolidated response to the CMA's RFI.

1.10 On relevant Android devices, these choice screens relate to the Search widget and Chrome application. Some other Google-owned access points on those devices such as Circle to Search are locked to Google Search, so there are no means of changing the search provider (either through the choice screen or subsequently via settings).[18]

Default search settings after setup

1.11 After set-up, consumers are able to change their default search provider on Chrome and the Search widget on Android devices.[19] The user journey to change the default search provider in Chrome depending on the device ranges between 4 to 6 steps (see Figure 2 below). Consumers are also able to follow similar steps to change their default search provider on Chrome on desktop devices.[20]

Figure 2. CMA audit of user journey to change default search provider for Chrome on Samsung 20 device



Source: Screenshots taken by the CMA using a Samsung 20 device, 2 December 2025.

1.12 On Android there is no search default setting API which means that users' search settings are not known to third-party search providers, even when those providers have been selected as the default,[21] so only Google is able to adjust prompts to the user by reference to such settings making it hard for third party search providers to use effective and timely prompts.

1.13 Google explained that it does not display prompts in relation to search on mobile devices (other than the Dual or Android Choice Screens). Google only

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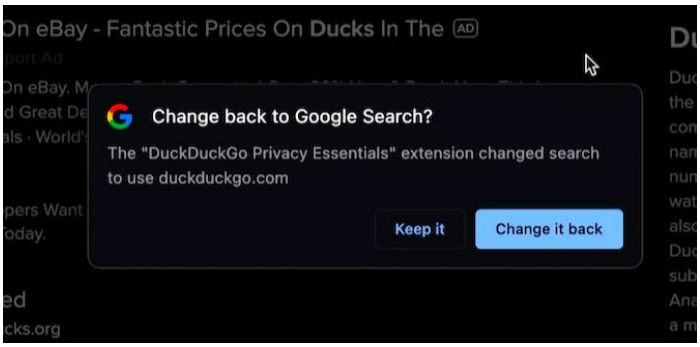
[18] This was noted by one traditional general search provider: DuckDuckGo's submission to the CMA.
[19] Google's consolidated response to the CMA's RFI.
[20] Google's consolidated response to the CMA's RFI.
[21] This was noted by one traditional general search provider. DuckDuckGo's submission to the CMA.

uses prompts on Chrome on desktop to inform consumers that a search extension in Chrome is seeking to change their default search settings (see Figure 3 and paragraph 4.63 below).[22]

Figure 3. Example prompt used by Google to change back their default settings on Chrome



Source: *Image from DuckDuckGo submission*[23]

Issues with Google's existing choice architecture

1.14 As detailed in our SMS Decision, the evidence shows that defaults can act as a barrier to entry and expansion for rival search providers that are not set as the default on access points.[24] Google's existing choice architecture, including the voluntary choice screens, offers consumers the ability to make some choices about their preferred search providers. However, we have identified a number of shortcomings with (a) existing choice screens presented to UK users and (b) the ability for a UK user to change default search settings outside of the choice screen. These limitations impact consumers' ability to make informed and effective choices regarding their preferred search provider. This can act as a barrier to entry and expansion for other search providers.

Problems with existing choice screens

1.15 We have identified several limitations with the Dual and Android Choice Screens that are currently displayed to UK users on a voluntary basis which we consider have impacted their effectiveness in relation to user choice and engagement:

(a) **Limited coverage** – existing choice screens in the UK are only displayed on Android devices (excluding Google Pixel devices) and are not

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[22] [Statement made by Google]. Google's response to the CMA's RFI.
[23] DuckDuckGo's submission to the CMA.
[24] Strategic Market Status investigation into Google's general search services: Final Decision (SMS Decision), 10 October 2025, paragraph 5.185.

displayed on the Chrome browser on desktop and iOS/iPadOS devices.[25] We estimate that this excludes [15-35] million devices a year from displaying the choice screen.[26] We also found that a user's choice of default does not apply to all Google-owned access points on relevant Android and Google Pixel devices.[27, 28] We are concerned that the coverage of existing UK choice screens may limit their effectiveness.

(b) **Narrow eligibility** – as we identified in our SMS Decision, the search sector is rapidly changing and the way users search the web is evolving, including through the growth of new generative AI-based services.[29] Currently, no generative AI-based services are included in UK search choice screens. We want to ensure that the eligibility criteria for inclusion in choice screens appropriately include relevant competing providers of search services – particularly as offerings, and user expectations and behaviour, evolve.

(c) **Low frequency and timing** – existing UK choice screens are only shown to users when they are setting up a new device (or when resetting or adding an additional account to a device),[30] which limits how often users are prompted to engage with their choice of default search service on existing devices and are able to learn from that experience. In particular, the Android Choice Screen is shown to approximately 20% of all Android devices in use in the UK annually on average.[31] However, when measured against Android devices in use in the UK which are eligible to display a choice screen, approximately 40% of such devices were shown a choice screen in 2024.[32] We have also found that the rollout of existing

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[25] Google's consolidated response to the CMA's RFI.
[26] See paragraph 5.16.
[27] As set out in Table 1. Summary of Google's existing choice screens, the existing Android Choice Screen in the UK only applies to the Search widget and Chrome application.
[28] Two traditional general search providers raised concerns that a user's choice of default does not apply to all Google-owned access points on relevant Android and Google Pixel devices. One considered that this disrespects the user's choice and creates significant confusion. Ecosia's response to the CMA's RFI. The other also noted that some search access points are locked to Google Search or hard to change such as Circle-to-Search and cannot be updated. DuckDuckGo's response to the CMA's RFI.
[29] Strategic Market Status investigation into Google's general search services: Final Decision (SMS Decision), 10 October 2025, paragraph 5.22.
[30] Google's consolidated response to the CMA's RFI.
[31] This figure includes the entire stock of Android devices in use in the UK, including legacy devices which are technically unable to show choice screens. CMA calculations based on Google's consolidated response to the CMA's RFI; Google's consolidated response to the CMA's RFI; and Google's letter to the CMA.
[32] Google's letter to the CMA.

choice screens across Android devices has been slow.[33] Based on this evidence, we are concerned that the current frequency of display and timing of choice screens in the UK impacts their effectiveness.

(d) **Lack of information** – consumers have low awareness of, and engagement with, search providers beyond Google Search.[34] There is also evidence that some consumers confuse search and browser providers.[35, 36] We are concerned that existing UK choice screens do not provide users with sufficient accompanying information to make sure they understand the choice they are making.

Difficulties in changing default search services outside of the choice screen

1.16 We have also identified problems with the user journey to change the default search service outside of the choice screen. These include:

(a) **Fragmented switching experience in settings –** changing default settings for search involves multiple steps and friction for users[37] which can make switching harder after the device setup.[38] We found that default search services have to be switched on each access point individually.[39]

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[33] We heard from one traditional general search provider that the current rollout of the existing DMA choice screens has been slow and infrequent and that limiting rollout to new devices has left many legacy devices uncovered. DuckDuckGo's response to the CMA's RFI and DuckDuckGo's response to the CMA's RFI. Another traditional general search provider made similar points in relation to both the Android and the DMU choice screen and noted that continuing to limit choice screen rollout to new devices could delay users from selecting alternative search providers especially as the lifespan of mobile devices continues to increase. [✂]'s response to the CMA's RFI.

[34] For example, a survey commissioned by the ACCC found that most consumers surveyed tend to stay with their device's pre-installed and pre-set search engine and are not aware of other options. See ACCC, Digital platform services inquiry: Interim report No. 3 – Search defaults and choice screens (2021). This finding was confirmed by research commissioned by the CMA, as part of the Mobile Browsers and Cloud Gaming Market Investigation, which reported that engagement with choosing a specific search engine is low. See Verian Group UK, Mobile Browsers Qualitative Consumer Research: Findings presented to Mobile Browsers and Cloud Gaming Inquiry Group (2023), slide 20 and research commissioned by the CMA, as part of the SMS investigation into Google's general search and search advertising services, which reported that engagement with choosing a specific search engine is low. See Thinks, SMS investigation into Google's general search and search advertising services: Exploring consumers' search behaviour - Qualitative research report (2025), paragraphs 5.11-5.13.

[35] Verian Group UK, Mobile Browsers Qualitative Consumer Research: Findings presented to Mobile Browsers and Cloud Gaming Inquiry Group (2023), slide 20; and [✂]'s response to the CMA's RFI.

[36] Some traditional general search providers noted that showing the user more information before making their choice would help to increase awareness and engagement with the choice. Ecosia's response to the CMA's RFI. DuckDuckGo's response to the CMA's RFI. DuckDuckGo's submission to the CMA. [✂]'s response to the CMA's RFI. [✂]'s response to the CMA's RFI.

[37] Perplexity's response to the CMA's RFI. DuckDuckGo's response to the CMA's RFI.

[38] DuckDuckGo's response to the CMA's RFI.

[39] For example, on an Android device a user has to separately update their default search provider on the Chrome application and the Search widget. Google's consolidated response to the CMA's RFI.

Data submitted by Google also showed that only [a small minority] of users on Android, [a small minority] of users on macOS and [a small minority] of users on iOS have a non-Google default search provider.[40] Based on our internal audit and evidence, we are concerned that the current switching process is time-consuming and complex for users and users are therefore less likely to update their default settings to reflect their preferences.

(b) **Information asymmetries in relation to default settings** – we found that only Google has visibility over which search provider a user has selected as their default across Google-owned access points even when third-party search providers have been selected.[41] We are concerned that information asymmetries in relation to default settings may limit other search providers' ability to effectively engage with users in relation to their default search settings.

(c) **Unbalanced prompts displayed by Google** – Google currently displays a prompt on Chrome on desktop when users install a third-party search extension (see Figure 3) which we consider may limit user switching.[42] While this prompt may be necessary to ensure users' data is protected, we are concerned the prompt is not balanced and may be unduly deterring consumers from switching to alternative search services.

[40] CMA calculations based on Google's consolidated response to the CMA's RFI. To note, this figure is an estimate based upon a sample of pseudo-anonymous Chrome clients for January 2025.
[41] This information asymmetry was noted by one traditional search provider: DuckDuckGo's submission to the CMA. Two traditional search providers also told us that there is no API to level the playing field. Ecosia's response to the CMA's RFI. Ecosia's response to the CMA's RFI. DuckDuckGo's response to the CMA's RFI. DuckDuckGo's submission to the CMA.
[42] Three stakeholders submitted that Google is limiting switching by displaying this prompt. DuckDuckGo's response to the CMA's RFI. [✂]'s response to the CMA's RFI. Note of call with [✂].

2. Aim of our User Choice CR

2.1 Taking into account the nature of the concerns set out in section 1 above, the aim of our proposed User Choice CR is to improve Google's current search choice screens and related choice architecture in order to improve UK users':

(a) awareness of the broad range of available search providers;

(b) engagement with, and confidence in, their choice of search provider; and

(c) ability to choose quickly and easily between search providers on key Google-operated access points, such that they can choose a search provider that best meets their needs.

Statutory objective(s)

2.2 As explained in the 'Introduction to the consultation' document, the Act provides that CRs must seek to achieve one or more of three statutory objectives.[43]

2.3 The proposed User Choice CR would pursue the open choices objective (section 19(7) of the Act): that users or potential users of general search services[44] are able to choose freely and easily between the services or digital content provided by Google and services or digital content provided by other undertakings.

Permitted type(s)

2.4 As explained in the 'Introduction to the consultation' document, each CR must fall within an exhaustive list of 'permitted types' set out in the Act.[45]

2.5 The proposed User Choice CR would fall under the permitted type set out in section 20(2)(e) of the Act, which permits requirements that oblige Google to present to users or potential users any options or default settings in relation to general search services in a way that allows those users or potential users to make informed and effective decisions in their own best interests about those options or settings.

[43] Section 19(5) of the Act.
[44] These terms have broad meanings: see section 118(1) and (2) of the Act and the explanatory notes to the Act, paragraph 533(f) and (g).
[45] Sections 19(9) and 20 of the Act.

The consumer benefits likely to result from this CR

2.6 Before imposing a CR, the CMA must have regard in particular to the benefits for consumers that it considers would likely result from the CR.[46]

2.7 We consider that the proposed User Choice CR would likely improve consumers' awareness of, engagement with and confidence in, search services as well as their ability to switch default search providers easily and quickly in line with their personal preferences and in response to changes within the sector.

2.8 The proposed User Choice CR would also likely to give rise to improved competition in search, supporting further benefits to consumers in the longer term. If, as a result of the proposed CR, more users explore and select alternatives to Google this could bring advantages to those rival search services, such as greater availability of click-and-query or personalisation data. In turn this could lead to an improvement in those providers' services, including the quality of their search results and would increase the competitive pressure on Google. This could support more competition in search, creating sharper incentives for innovation and investment in high-quality services that consumers value.

2.9 We discuss these consumer benefits – as well as other benefits to which the User Choice CR could give rise – in more detail in the Proportionality section below.

[46] Section 19(10) of the Act.

3. Our proposed User Choice CR and Interpretative Notes

3.1 Having identified our aim (see paragraph 2.1) based on the concerns identified in section 1, we are proposing to impose the following draft User Choice CR on the basis of the effectiveness and proportionality analysis set out in sections 4 and 5 below respectively.

Definitions

1. In this conduct requirement:
    a. **Android Devices** means devices which use the Android mobile operating system (Android OS).
    b. **API** means an application programming interface.
    c. **Default Search Provider** means a User's choice of provider to be the default search service to respond to User queries via Relevant Access Points.
    d. **Eligibility Criteria** means the following criteria:
        i. Adequately address the full range of use cases of a general search engine on a wide range of subjects by searching the web.
        ii. Provide the expected general search experience for affected search access points.
        iii. Be considered by a significant proportion of UK users to provide a general search service.
        iv. Be operated and marketed with general search as a core and central part of the service.
    e. **Eligible Providers** means applicants that have been determined by Google to meet the Eligibility Criteria.
    f. **Prompt** means a screen presented to a User (other than a Search Choice Screen) which relates to their default search settings, including their Default Search Provider, on Relevant Browsers and Relevant Devices.
    g. **Relevant Access Points** means:
        i. the address bar on a Relevant Brower; and
        ii. the default search application Search Widget and the address bar on the Chrome application on a Relevant Device.
    h. **Relevant Browser** means the Google Chrome application (or any other Google application which functions as a web browser) on any desktop, mobile or tablet operating system (including Windows, Android OS and iOS/iPadOS) sold in the UK where Google Search

has been set as the default search service, other than when it is installed on a Relevant Device.

i. **Relevant Device** means any Android Device sold in the UK where the original equipment manufacturer of the device has selected to pre-install the Google Search application and/or a Search Widget on which Google has been set as the default search service.
j. **Search Widget** means the search bar placed on the home screen of a Relevant Device through which searches can be conducted.
k. **Search Choice Screen** means a user interface through which the User can select an Eligible Provider to be their Default Search Provider.
l. **Device-level Default Setting** means a single setting that provides the ability easily to select a new Default Search Provider from a list of installed (or pre-installed) Eligible Providers.
m. **User** means a user of a Relevant Browser or Relevant Device.

Search Choice Screen

2. Google shall provide Users, or ensure that Users are provided, with a Search Choice Screen that cannot be skipped on all Relevant Browsers and all Relevant Devices that enables Users to select a Default Search Provider:
    a. on first use or setup of the Relevant Browser or Relevant Device; and
    b. at least once a year,

    except that where the Search Choice Screen is provided on a Relevant Browser or Relevant Device pursuant to (a) above, it need not be provided again on that Relevant Browser or Relevant Device pursuant to (b) above within the following six months.

3. The Search Choice Screen shall present Users with the ability to:
    a. choose a Default Search Provider from a reasonable number of Eligible Providers; and
    b. find and select a Default Search Provider from a list of any Eligible Providers not displayed on the Search Choice Screen.

4. Once a User has selected a Default Search Provider on the Search Choice Screen, Google shall ensure that:
    a. On a Relevant Browser, the Default Search Provider is set as the default to respond to any User queries through the address bar;
    b. On a Relevant Device, the Default Search Provider is set as: (i) the default search application; (ii) either the default Search Widget or as the default to respond to any User queries entered into Google's

Search Widget; and (iii) the default to respond to any User queries entered in the address bar.

5. Google shall ensure that Users are able easily to access the Search Choice Screen at any time as part of the settings on Relevant Browsers and Relevant Devices.

Information Screen

6. Google shall ensure that any display of the Search Choice Screen is immediately preceded by a screen providing clear, accurate and balanced information to Users to assist them in selecting a Default Search Provider.

'Test-drive' function

7. Google shall ensure that the Search Choice Screen offers Users an option to select a Default Search Provider for a short, defined period, following which the User will be given the choice to confirm their choice of the Default Search Provider, select another Default Search Provider or conduct a further 'test-drive' as set out in this paragraph.

Approval of Eligible Providers

8. Google shall establish a clear, fair and transparent process for selecting Eligible Providers every six months by reference only to the Eligibility Criteria.

Device-Level Default Setting

9. Google shall provide Users, or ensure that Users are provided, with a Device-Level Default Setting on a Relevant Device through a process that is accessible, straightforward and not hindered by excessive steps or complexity.

10. Google shall ensure that the selection of a new Default Search Provider through the Device-Level Default Setting has the same effect as the selection of a Default Search Provider on the Search Choice Screen, as set out in paragraph 4.b.

Search default setting API

11. Google shall provide Eligible Providers, or ensure that Eligible Providers are provided, with an API through which they can be made aware of whether they

are a User's Default Search Provider on Relevant Browsers and Relevant Devices.

Prompts

12. Google shall ensure that any Prompts are presented in a fair and balanced way.

Proposed Interpretative Notes

3.2 The CMA may publish interpretative notes to accompany a CR. Interpretative notes will provide greater clarity over the CMA's interpretation of a CR, including how it may apply in particular circumstances, for the benefit of both the SMS firm and other industry participants.[47] It would be open to the SMS firm to take a different approach to the one outlined in the interpretative notes where it is able to demonstrate to the CMA that its approach complies with the terms of the CR.[48]

3.3 We propose that the User Choice CR be accompanied by the following set of interpretative notes.

Choice Design Principles

1. Google should ensure all user choice architecture related to selecting or changing a Default Search Provider, including the Search Choice Screen, the Device-Level Default Setting and any Prompts, is targeted, understandable and balanced. The design and implementation of choice architecture can significantly impact Users' ability to make effective and informed choices. Google's choice architecture should be based on the following three broad choice design principles:

    a. Targeted – presenting choices to Users at the right place, at the right time, with the right frequency. This includes identifying suitable points for the choice to be presented and ensuring that Users' preferences are consistently applied. Users should be prompted when they are most likely to engage with the choice. Users can learn from previous experience (including mistakes) and their preferences can also change over time. It is important to give Users the opportunity to make

[47] See Digital Markets Competition Regime Guidance (CMA194), paragraphs 3.59 to 3.60.
[48] See Digital Markets Competition Regime Guidance (CMA194), paragraph 3.61.

choices more than once, which can help them learn but also let them change without encountering difficulty whenever they choose. However, asking Users too often can overwhelm them and lead to poor decisions.

b. Understandable – giving choices that Users understand. This includes designing the layout or presentation of choices to ensure that Users adequately understand the choice and can make decisions in their best interests.

c. Balanced – giving Users autonomy and minimising unjustified friction. Users should have the ability to make important choices with their preferences implemented and respected. This includes the balanced presentation of options, whereby visual information such as colours, highlighting and framing is not used to influence Users towards certain decisions. Balanced choice architecture seeks to find the right amount of friction for consumers – minimising unjustified friction and understanding where friction can be positive (eg confirming an important action). It also means neutral framing of options, so as not to influence Users towards making certain decisions that may not be in their best interests.

2. In seeking to design effective choice architecture, it may be desirable that design choices are tested with consumers before they are implemented.

Search Choice Screen

3. Paragraphs 2 to 5 of the conduct requirement set out Google's obligations in relation to the Search Choice Screen, to be shown on Relevant Browsers and Relevant Devices.

4. The CR requires that new Relevant Browsers and new Relevant Devices should show the Search Choice Screen as part of first use or set-up. Google may determine the exact point of set-up at which the Search Choice Screen appears. At set-up, if the Relevant Browser or Relevant Device is also eligible to see another type of choice screen, Google may determine the optimal order (from a User's perspective) to show the choice screens.

5. The CR requires that the Search Choice Screen should also be shown at least annually on all Relevant Browsers and Relevant Devices. This could be done as part of a Relevant Device restart process connected to a major software update and as part of a Relevant Browser application update or

linked to specific date roll-out that would be shown to all Users at the same time.

6. The CMA acknowledges that this could result in a User seeing the Search Choice Screen twice in quick succession on the same Relevant Browser or Relevant Device where it has been first used or set up shortly before the date on which the Search Choice Screen is shown across all Relevant Browsers and Relevant Devices. As a result, paragraph 2 of the conduct requirement contains an exemption to the general obligation to show the Search Choice Screen annually where it has been shown on set-up of the Relevant Browser or Relevant Device within the preceding six months.

7. Google should ensure that Eligible Providers are given sufficient advanced notice of when the 'annual' Search Choice Screen will be displayed to existing Users so that they can prepare marketing campaigns in advance and maximise their chances of being selected through the Search Choice Screen.

8. Paragraph 3.a. of the conduct requirement provides that the Search Choice Screen must include a reasonable number of Eligible Providers and the ability to find and select any other Eligible Provider as the Default Search Provider.

9. The CMA considers that the Search Choice Screen should list approximately 12 Eligible Providers, some of which ought to be selected based on popularity, while others ought to be selected randomly.

10. The CMA would expect Google to liaise with Eligible Providers to obtain a short description of their service to be included as part of the Search Choice Screen.

11. The order in which the Eligible Providers are listed ought to be random (either entirely, or within the two groups specified in paragraph 9 above).

12. Once a User has selected a Default Search Provider from the Search Choice Screen, Google is required to take all necessary steps to set that Default Search Provider as the default across the access points identified in paragraph 4 of the conduct requirement for the Relevant Browser or Relevant Device.

13. Pursuant to paragraph 5 of the conduct requirement, Google must also provide an option for the User to retrigger the Search Choice Screen at any time they wish from the settings of the Relevant Browser or Relevant Device.

Information screen

14. The information screen required pursuant to paragraph 6 of the conduct requirement should contain clear, accurate and balanced information about what a search service is and how the User's choice will affect their settings and search experience.

15. The information screen should also clearly explain to consumers the key features of the Eligible Providers that may appear on the Search Choice Screen. This will help Users make informed decisions and set appropriate expectations about the nature of the Default Search Provider they are selecting.

16. Where the information screen is shown alongside additional choice screens, the content of the information screen should be modified accordingly to ensure Users understand the nature and implications of the choices they are making across different services.

'Test-drive' function

17. Google may determine the length of time for which a User would have the ability to 'test-drive' an Eligible Provider as the default. In doing so, Google may use user testing to determine the appropriate length of time. Google may also consider giving consumers an option to select the length of their 'test-drive' within a defined range.

18. At the end of any 'test-drive' of an Eligible Provider, the User should be given the option to:

    a. set that or different Eligible Provider as their ongoing Default Search Provider; and

    b. 'test-drive' that or different Eligible Provider for a further defined period.

Device-level Default Setting

19. Google should retain the existing User journey to change default settings across access points and create a Device-level Default Setting that should, for example, mirror the default browser setting that is present on Android Devices.

20. To support Users' ability to switch, the CMA considers that Google should enable effective search terms such as 'default' and 'default search' to make these settings easily discoverable on devices.[49]

Search default setting API

21. Google must provide Eligible Providers with access to an API that allows them to determine if they are set as the User's Default Search Provider on a Relevant Browser or Relevant Device.

22. Google can ensure that there are reasonable limits to how frequently the API can be accessed and how frequently Users can be prompted. The API could be provided on a similar basis to the API provided in the context of browsers on Android Devices.[50]

23. Users will likely need to provide their consent for this information to be shared with Eligible Providers and could be asked as part of the set-up process or installation.

Prompts

24. Google may use Prompts or pop-ups to notify Users of changes to their default search settings, for example to protect Users from a situation where they may be unaware of those changes. However, any such notifications should not ask Users if they want to switch to Google Search (or any other Google search product).

[49] Mozilla, '"Easy" Default Browser Settings. iOS and Windows', 2025, accessed by the CMA on 10 January 2026.
[50] See Mobile Browsers and Cloud Gaming market investigation Working Paper 5, 5 July 2024, paragraph 4.60-4.62.

4. Effectiveness of our proposed User Choice CR

4.1 Having identified an aim (see paragraph 2.1 above), the CMA will identify a CR, or combination of CRs, that would likely be effective in achieving this aim. As part of this, the CMA will consider both the content and form of potential CRs.[51]

4.2 This section sets out the analysis we have undertaken to identify the effective design of a User Choice CR. It focuses on the following in turn:

(a) The reasons we are proposing this form of CR to address our aim;

(b) The key design choices we have made to ensure the proposed CR is effective in meeting the aim; and

(c) Implementation and compliance considerations.

The reasons we are proposing this form of CR to address our aim

4.3 As set out above, the design of choice architecture is key to ensuring that users can make active and informed choices. In order to meet the aim we set out above we are therefore focused on making Google's choice architecture more effective in supporting users to make these active and informed choices in relation to general search.

4.4 Bearing in mind the important role played by defaults in general search, as we identified above (see paragraph 1.3), the display of choice screens is likely to be an essential part of any package of measures to enable consumers to exercise active and informed choices over their default search provider, thereby meeting our aim. Experimental evidence has shown that choice screens increase engagement with a wider set of market competitors, increase choice comprehension, and increase confidence in decision-making, enabling consumers to exercise active choices in digital markets.[52] They are often displayed by market participants as part of helping consumers navigate

[51] See Digital Markets Competition Regime Guidance (CMA194), paragraph 3.20(b).

[52] Mozilla, Can browser choice screens be effective?: Experimental analysis of the impact of their design, content and placement (2023), accessed by the CMA on 4 December 2025; BEUC, An Effective Choice Screen under the Digital Markets Act: BEUC Recommendations (2023), October 2023, accessed by the CMA on 9 December 2025.

their services; but have also been a strong focus of regulatory measures to improve consumer outcomes and competition in many jurisdictions.[53]

4.5 As set out in the 'Aim' section above, the focus of our intervention is on improving consumers' awareness of and engagement in the options for search. In designing our proposals, and in measuring their success, we will focus on metrics of awareness and engagement. The interpretation of the effectiveness of choice screens has often been associated with whether they have encouraged more consumers to choose different services rather than improving awareness of alternatives and engagement with the choice. For example, this was the case with all search choice screens on Android devices in the EEA (including the UK) and Russia.[54] Another illustration is the effectiveness of the browser choice screen displayed by Microsoft.[55] However, focusing solely on levels of switching to alternative providers may be a misleading measure of a choice screen's effectiveness, given that it should allow consumers to find a provider that is in line with their preferences, which may result in them staying with their existing (or the incumbent) provider.

4.6 Beyond the choice screen, we consider that meeting our aim requires specific changes to the user journey for switching the default search service, to make this process quicker and easier. Steps to remove friction for users in switching their search service providers could make them more likely to consider a switch, giving rise to the benefits discussed at paragraph 1.16 (a) above.

4.7 Our User Choice CR would therefore include two parts, both of which are required to meet our aim:

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[53] Choice screens as a regulatory measure are used in the EU, UK, Russia, Japan, etc. See: CEPR, The role of default settings in online searches (2023)', March 2023; and Japan Fair Trade Commission, Mobile Software Competition Act Guidelines (2025), July 2025, both accessed by the CMA on 25 January 2026.

[54] The Search Choice Screen on Android devices has been introduced in 2017 in Russia, following an antitrust investigation with the Russia's Federal Antimonopoly Service, and the data showed did increase market share for the native search engine – Yandex – after the roll-out of the choice screen. See Decarolis, F., Li, M., & Paternollo, F. (2025)., 'Competition and defaults in online search. *American Economic Journal: Microeconomics*,' *17*(3), 369-414, Sep 2024, accessed by the CMA on 30 November 2025.

[55] The Browser Choice Screen on desktop devices displayed by Microsoft in the EEA between 2010- 2014 following the European Commission's Internet Explorer infringement decision. The choice screen malfunctioned for 14 months due to a software bug. See: See: European Commission, Commission fines Microsoft for non-compliance with browser choice commitments, March 2013; and Tech Policy JPress, ''Choice Screen' Fever Dream: Enforcers' New Favorite Remedy Won't Blunt Google's Search Monopoly (2024)', 15 February 2024, both accessed by the CMA on 3 December 2025.

(a) proposals for a new search choice screen (the **Search Choice Screen**) instead of existing choice screens; and

(b) changes to improve the user journey for switching search services.

The key design choices we have made to ensure the proposed CR is effective in meeting the aim

4.8 Based on the analysis of existing choice architecture and the issues we identified above (see paragraph 1.15 above) we have made the following design choices to ensure the proposed User Choice CR would be effective in meeting our aim:

(a) in relation to the Search Choice Screen:

(i) **Greater coverage**: the Search Choice Screen should be shown on all Android devices where Google Search is pre-installed (in relation to the Search widget and Chrome app) and Chrome on iOS/iPadOS and desktop (in relation the default search provider on that browser app);

(ii) **Wider eligibility**: the eligibility criteria should be designed to allow for the possibility of a broad range of providers that can fulfil consumers' search needs, given the rapid changes within the search sector;

(iii) **Increased frequency and timing**: the Search Choice Screen should be shown periodically across all devices, in addition to on device set up;

(iv) **Better design of choice architecture**: Google should apply certain design principles for the relevant choice architecture and the Search Choice Screen should include an information screen to support users' choices; and

(v) '**Test-drive' option**: the Search Choice Screen should provide users with the ability to 'test-drive' a search provider for a short, defined period.

(b) in relation to the rest of the user journey for switching search providers:

(i) **Device-level consumer journey**: users should have a single setting for changing the default search provider on Android devices (in relation to the Search widget and the Chrome app);

(ii) **Search settings API**: third-party search providers should have access to information about a user's default settings; and

(iii) **Balanced prompts**: prompts by Google to users about their search defaults should be presented in a fair and balanced way.

4.9 We explain each of these design choices in more detail below.

Greater coverage

4.10 Current choice screens in the UK are limited in terms of the access points they cover (see paragraph 1.15(a) above). We have therefore considered below whether we could expand this coverage to increase the overall effectiveness of the Search Choice Screen in meeting our aim by improving users' ability to exercise effective choices across more relevant Google-owned access points.

Expansion to cover additional devices and browsers

4.11 Currently, the voluntary UK search choice screens are only shown on Android devices (excluding Google Pixel devices) where Google Search has been pre-installed. By contrast, the DMA Choice Screen is also shown on Google Pixel devices, the Chrome app on iOS/iPadOS mobile devices and the Chrome browser on desktop devices (see Table 1 above).

4.12 In relation to Android devices, we propose that the Search Choice Screen is displayed where Google Search has been pre-installed and/or set as default on the device in factory set-up by OEMs. We understand that this would capture the majority of Android devices currently.

4.13 We also propose to apply the Search Choice Screen to Google Pixel devices and Chrome on iOS/iPadOS and desktop devices where Google Search has also been pre-installed and/or set as default. This would be consistent with the DMA Search Choice Screen. We estimate that showing the Search Choice Screen annually on Chrome on desktop and iOS/iPadOS would result in an additional [15-35] million devices showing the Search Choice Screen each year.[56]

[56] This consists of roughly [10-20] million desktop devices and [5-15] million iOS/iPadOS devices. To calculate this, we have estimated the number of Chrome users on desktop (as a proxy for the number of devices) by taking Uswitch data from March 2021 and combining with Statcounter data on the Chrome desktop market share as of

4.14 As the focus of this proposed CR is Google's choice architecture, further to Google's SMS designation, third-party access points are not covered by the Search Choice Screen.[57]

Expansion to cover more access points on Android devices

4.15 On Android devices covered by the three existing choice screens (see Table 1 above), a user's selection of a default search provider applies directly to the Search widget and the Chrome app. It may be carried over 'indirectly' to other Google-owned access points such as Google Lens. It is not carried over to third-party access points on Android devices (such as third-party browsers).[58]

4.16 Some stakeholders told us that to increase effectiveness choice screens should be extended to apply to additional access points, some of which are currently locked to Google, and cannot be changed to an alternative search provider (either through the choice screen or subsequently).[59]

4.17 In order to assess whether applying the Search Choice Screen to other access points would benefit users, we have considered the monthly average number of queries for each access point set out in Table 2. This shows that the three key Google-owned access points for Google's general search are the Google Search App, Chrome and the Search widget.[60]

4.18 Although the Google Search app is also a significant Google-owned access point, we do not consider that users would expect to use a different search provider via that app, so do not propose to include it as part of the User Choice CR.[61]

November 2025. We have then added the number iOS/iPadOS Chrome clients (as a proxy for the number of devices) based on data submitted to us from Google. See: Uswitch, UK Mobile Phone Statistics 2025, August 2025, accessed by the CMA on 29 November 2025; Statcounter, Desktop Browser Market Share United Kingdom, accessed by the CMA on 5 January 2026; Google's consolidated response to the CMA's RFI.

[57] Important third-party access points for Google's search services include Safari, Samsung Internet Explorer, Mozilla and Opera. For example, an average of over [2-3] billion searches are conducted each month in the UK through Apple's Safari browser across iPhones, iPads and Mac devices where Google Search is set as default. Apple's response to the CMA's RFI.

[58] Google's consolidated response to the CMA's RFI. Google's response to the CMA's RFI.

[59] Ecosia's response to the CMA's RFI. DuckDuckGo's response to the CMA's RFI. DuckDuckGo's submission to the CMA. [✂]'s response to the CMA's RFI.

[60] CMA calculations based on Google's consolidated response to the CMA's RFI; and Google's response to the CMA's RFI.

[61] Where a user chooses someone other than Google on the Search Choice Screen, this would continue to result in the installation of the selected provider's search app on the device (if not already installed). That alternative app may act as an alternative to the Google Search app for that user.

Table 2. Monthly average number of queries that go through Google-owned access points[62]

	Android	iOS/iPadOS	Desktop
Google Search App*	[1-5 billion]	[1-5 billion]	n/a
Search widget	[1-5 billion]	n/a	n/a
Chrome*	[1-5 billion]	[1-5 billion]	[1-5 billion]
Google.com*	[0-1 billion]	[0-1 billion]	[0-1 billion]
Google Lens*	[0-500 million]	[0-500 million]	[0-100 million]
Circle to Search*	[0-100 million]	n/a	n/a

* these values capture only Google Search queries while others capture all search queries

4.19 The other potentially relevant Google-owned access points on an Android device (including Circle to Search, Text to Search, Google Assistant and Google Lens) see a significantly lower volume of search queries at present. We recognise that switching the default for some of these more minor access points may be technically complex and it is unclear whether other search providers would be able to provide alternative solutions. If we required a search provider to be able to act as a default across all of the Google-owned access points in order to appear on the Search Choice Screen, this would therefore risk limiting the options available to users.

4.20 We therefore consider that the Search Choice Screen should apply only to the key Google-owned access points on Android devices which represent a significant proportion of on-Android device searches, namely the Search widget and Chrome app.

Wider eligibility

4.21 As set out above, we want to ensure that the eligibility criteria for inclusion in choice screens appropriately include relevant competing providers of search services – particularly as offerings, and user expectations and behaviour, evolve. Ensuring a range of broad and compelling search offerings on the Search Choice Screen would promote consumers' engagement in their choice

[62] Data provided for the UK between June 2024 and June 2025. Google stated that it was unable to provide data on the number of searches conducted through Text to Search and Google Assistant, but in these cases the number of searches is expected to be very small. Google's response to the CMA's RFI.

of search provider, therefore helping to ensure the User Choice CR would be effective in meeting its aim.

4.22 We are proposing eligibility criteria for the Search Choice Screen that base the assessment on the technical capability and functionality, stakeholder expectations, user perception and producer positioning of each service:

(a) An eligible provider must:

(i) Adequately address the full range of use cases of a general search engine on a wide range of subjects by searching the web.

(ii) Provide the expected general search experience for affected search access points.

(iii) Be considered by a significant proportion of UK users to provide a general search service.

(iv) Be operated and marketed with general search as a core and central part of the service.

4.23 We welcome views on these proposed eligibility criteria, and how well their application would balance the benefits of giving users a broad range of search services to choose between and the risks of user expectations of a search service not being met or technical problems undermining user experience.

Process for applying the criteria and admitting eligible search providers

4.24 Currently, eligible search providers for the Android Choice Screen are assessed on an annual basis.[63] We consider that an annual application window may be too infrequent given the pace at which search services are evolving, potentially meaning the Search Choice Screen fails to reflect the latest developments in the market. We therefore propose that applications could be reviewed on a six-month basis.

4.25 In terms of who considers applications and applies the criteria: we recognise that Google currently determines the providers included on the Android Choice Screen and the DMA Choice Screen and provisionally have included

[63] Under the Android Choice Screen, interested search providers may submit applications annually in June via email and await confirmation from Google (see Android Choice Screen). Similarly, the DMA Choice Screen has an annual eligibility period in January (see DMA Search Choice Screen), both accessed by the CMA on 25 January 2026.

the same approach in our proposals. However, we would welcome views on this process, including what role, if any, the CMA ought to play.

Process of displaying eligible providers on the Search Choice Screen

4.26 Currently, the Android Choice Screen first displays the top five most popular eligible general search services (in random order) followed by up to seven remaining eligible general search services (also ordered randomly).[64]

4.27 We consider that this approach ensures that the choice screen offers users a reasonable choice of a range of popular and broader options, so we think it would help to meet our aim if the Search Choice Screen to adopt a similar approach. We would be interested in suggestions for the best way to determine popularity of the broader range of search services to be included on the Search Choice Screen.

4.28 Given the broader range of possible search services to be included on the Search Choice Screen, we also consider that user choice and engagement would benefit from users having the ability to find their preferred search provider if their provider is not displayed as one of the options on the Search Choice Screen (eg the user might be given an option to search the full list of eligible providers or something to that effect).

Increased frequency of display and timing

4.29 As described above, we are concerned that the current frequency of display and timing of choice screens in the UK impacts their effectiveness. We therefore think that more frequent display of the choice screen may be necessary to meet our aim.

4.30 The Android Choice Screen is shown only once per device during initial device set-up.[65] On average, the Android Choice Screen is shown to approximately 20% of all Android devices in use in the UK annually.[66] However, when measured against Android devices in use in the

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[64] See Android Choice Screen. The DMA Choice Screen shows the top eight ranked search providers, ordered randomly (see DMA Search Choice Screen), both accessed by the CMA on 25 January 2026.
[65] Google's consolidated response to the CMA's RFI. There may also be instances in which the same device sees the Android choice screen on multiple occasions, due to the device being reset or an additional account being added to the device.
[66] This figure includes the entire stock of Android devices in use in the UK, including legacy devices which are technically unable to show choice screens. CMA calculations based on Google's consolidated response to the CMA's RFI; Google's letter to the CMA. The Dual Choice Screen is shown

UK which are eligible to display a choice screen, approximately 40% of such devices were shown a choice screen in 2024.[67]

4.31 Furthermore, 21% of users obtained their current Android device three to four years ago and a further 6% obtained it over five years ago.[68] This means that over the course of the last six years during which the Android Choice Screen has been in place, a large number of Android device users will only have seen the choice screen once or twice at most.

4.32 We heard from traditional general search providers and AI services that choice screens should be shown on all devices – new and existing – on a regular basis.[69] One search provider submitted that as an alternative to a choice screen at device set-up or after, there should be a choice at every search within the search bar.[70]

4.33 We are therefore proposing that Google must display the Search Choice Screen to existing users of relevant browsers and/or devices on a periodic basis, in addition to displaying the Search Choice Screen at initial device setup. This would increase user exposure to choice screens and allow users to make ongoing, active choices and respond to any new trends in search, thereby effectively meeting our aim. The 're-display' of the Search Choice Screen should occur at a fixed point in the year, to enable competing providers to plan marketing campaigns to coincide with this point in time.

4.34 Google has raised a concern that the repeated display of choice screens leads to user fatigue.[71] However, we do not consider that a relatively short prompt to consider their search choice once a year is too onerous for users (in a context where users are already familiar with other regular prompts from Google on Chrome on Android and iOS).[72]

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to approximately 35% of all Android devices in use in the UK annually. Calculations based on Google's consolidated response to the CMA's RFI. Given the fact that the Dual Choice Screen does not show the search choice screen where they have seen the Android Choice Screen, this figure represents at least some users who were only shown the browser screen of the Dual Choice Screen.

[67] Google's letter to the CMA.

[68] Accent, Mobile Consumer Survey: Final Report, dated July 2025, accessed by the CMA on 19 December 2025, page 16.

[69] Ecosia's response to the CMA's RFI. DuckDuckGo's response to the CMA's RFI. DuckDuckGo's submission to the CMA. [✂] 's response to the CMA's RFI. [✂]'s response to the CMA's RFI. OpenAI's response to the CMA's RFI. Perplexity's response to the CMA's RFI.

[70] Mojeek's response to the CMA's RFI.

[71] [Google document].

[72] For example, the prompts Google shows on iOS include prompts on (i) Chrome application such as default prompt in Chrome on iPad, Blue 'Dot' interactive prompt in Chrome on iOS mobile phones, (ii) other first party

4.35 We have considered different frequency options, including every six months, annually or every two years. For example, a more frequent choice screen would bring some additional costs to users by requiring them to engage in their choice more often. Conversely, a less frequent choice screen could give insufficient prompts to users actively to engage, including with new innovative search services, reducing their opportunities to find a service that works best for them. We consider showing the Search Choice Screen on an annual basis provides the best balance and would be sufficient to meet our aim through the User Choice CR. We propose that the annual display of the Search Choice Screen happens on a fixed date across all eligible devices. This would enable search providers to plan for display of the Search Choice Screen: for example, to enable them to time marketing campaigns accordingly.

4.36 However, we also acknowledge that there is limited benefit to a user being shown the choice screen twice in quick succession, so if a device has been set up in the six months prior to the date of the annual roll-out of the Search Choice Screen, we do not consider it necessary to re-show the Search Choice Screen on that device. We also recognise that resurfacing the Search Choice Screen if shown on relevant devices may have implications for OEMs and are keen to consider these implications further as part of the consultation.

Resurfacing the Search Choice Screen via device-level or Chrome settings

4.37 After a user makes a selection via the current choice screen, any further changes to the default search provider on the Android device must be done via the Chrome app and/or Search widget on that device, where users are only presented a choice from the apps already installed on their device.[73] This means that if a user has not already chosen to download a new app, they would only see search providers that have been pre-installed, potentially limiting their awareness of alternatives.

4.38 We consider that Google should give users the option to trigger the Search Choice Screen at any time of their choosing, so that they can see the services available to them and their product descriptions. For Android devices, this could operate through the device settings menu. For Chrome on iOS/iPadOS

Google apps such as app switcher prompt, prompt on third-party mobile browsers such as 'switch to Chrome' prompt on Google.com accessed via Safari on iOS See: Mobile Browsers and Cloud Gaming market investigation Final Decision Report, March 2025, pages 415 – 419, paragraph 8.175-8.176; and pages 458 – 459, paragraph 8.301.

[73] Google's consolidated response to the CMA's RFI.

and desktop devices, users would re-surface the Search Choice Screen through the Chrome settings menu.

4.39 As noted above, we recognise that resurfacing the Search Choice Screen may have implications for OEMs, and are keen to consider these implications further as part of the consultation.

Better design of choice architecture

4.40 As noted above, the design of choice architecture can significantly impact users' ability to make effective and informed choices.

Principles for choice architecture design

4.41 Biased or confusing choice architecture can impede consumers from finding the best deals and switching between providers, preventing consumers from making active and informed choices and weakening competition.[74] Based on our existing work and thinking in the realm of online user choices,[75] and our review of extensive literature,[76] we have identified three important principles for choice architecture design: balanced, targeted and understandable. We are proposing to incorporate these design principles into the Interpretative Notes to guide Google's choice architecture design, including the Search Choice Screen, to ensure it is effective in meeting our aim.

Inclusion of information screen

4.42 As described above, there is also evidence that some consumers lack awareness and understanding of search providers. For example, some consumers confuse search and browser providers.[77] This means that

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[74] See CMA's Evidence review of Online Choice Architecture and Consumer and Competition Harm, April 2022, paragraph 1.6, for a detailed review of the impact of online choice architecture on consumer choice and competition.
[75] For example this includes the CMA's (2022) publications on Online Choice Architecture (OCA), April 2022; CMA's (2023) joint position paper with the Information Commissioner's Office (ICO) on the impact of harmful digital design on user choices and control over personal information, 2023; and the CMA's (2020) Online platforms and digital advertising market study final report, 2020, all accessed by the CMA on 25 January 2026.
[76] For example this includes Busch, C., & Fletcher, A. (2024), '*Harmful Online Choice Architecture',* Centre for Regulation in Europe (CERRE)', the Information Commissioner's Office (ICO) (2022); The Children's code design guidance and (2023) Data protection by design and default, the Financial Conduct Authority's (FCA) (2022) PS22/9: A new Consumer Duty, and the Office of Communication's (Ofcom) (2023) Establishing good media literacy design principles, all accessed by the CMA on 25 January 2026.
[77] See Verian consumer research (2024): presentation of key qualitative research findings (slide 20) and [✂].

consumers may not always understand the choices they are making on existing choice screens.

4.43 An experiment conducted by the Bureau Européen des Unions de Consommateurs (BEUC) found that including an information screen that explained potential differences in search engines caused consumers to pause and reflect on the right choice for them.[78]

4.44 We propose that in order to improve consumers' engagement with, and confidence in, their choice of search provider and ability to find a provider that best meets their needs, the Search Choice Screen be preceded by an information screen that clearly explains what a search service is, what the user's choice means, and how it will affect their default settings.

'Test-drive' option

4.45 As covered previously, consumers have low awareness and limited engagement with a wide range of search providers. Search services can be described as experience goods, meaning that consumers likely benefit if they use them for a period of time to understand their preferences about that service.[79] Our proposals to increase the frequency of showing the Search Choice Screen and include an information screen (see paragraphs 4.42 and 4.44 respectively) are likely to increase a user's ability to gain experience and apply it to their choice.

4.46 Further to this, recent research has indicated that giving consumers the ability to trial or 'test-drive' a search provider that they are less familiar with for a period of time may be an effective way of encouraging them to discover a more diverse search selection and giving them the information they need to make more active choices.[80] Such 'test-driving' may be particularly valuable when there is an incumbent option, and consumers are unaware or have no prior experience of using an alternative provider.[81]

4.47 In order to improve consumers' awareness of a broad range of search providers, and greater confidence in their choice of search provider, we are

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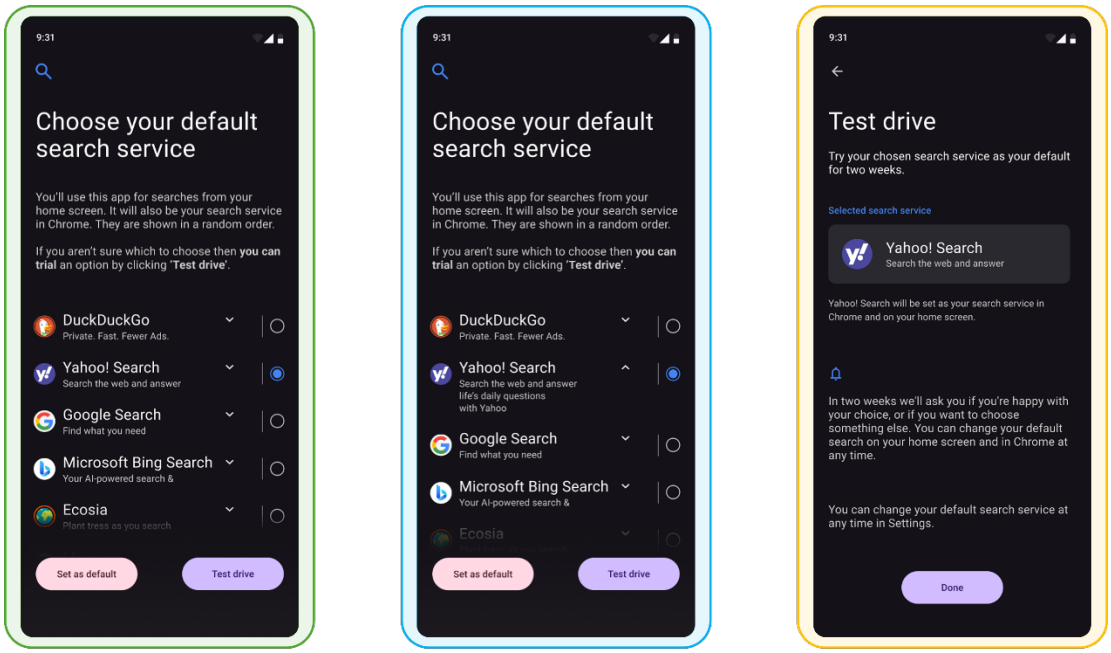
[78] See BEUC, An effective choice screen under the Digital Markets Act, October 2023, pages 4 and 5.
[79] Allcott et al., (2025), Sources of Market Power in Web Search: Evidence from a Field Experiment, NBER Working Paper Series.
[80] Allcott et al., (2025), Sources of Market Power in Web Search: Evidence from a Field Experiment; and Duque, O., (2024), Taking Behavioural Antitrust Seriously: On Default Agreements as Exclusive Dealing and the Debiasing of Potential Default Randomisation, Maryland Law Review, Volume 84, Issue 1, Article 5.
[81] Allcott et al., (2025), Sources of Market Power in Web Search: Evidence from a Field Experiment, NBER Working Paper Series.

therefore proposing to give consumers the option to ‘test-drive’ a search provider for a period (eg two weeks) before confirming their default preference. While Google would be responsible for designing the test drive interface, the CMA has prepared a mock-up to demonstrate what this might look like (see Figure 4 below). Such an option would allow consumers to experience and test other search providers that they may be less familiar with, with the comfort that they can easily change their mind if they so wish. This option could improve consumers’ awareness and engagement with search options, thereby improving the effectiveness of the Search Choice Screen in supporting consumers’ choices and driving competition.

Figure 4. Mock-up of ‘test-drive’ function in the user flow of the SMS Search Choice Screen



1 Selection screen

2 ‘Drop down’ info screen

3 Test-Drive Activation

Source: CMA’s internal mock-ups designs.

Key features of the proposed ‘test-drive’ function

4.48 The Search Choice Screen would include options to either set a search provider as a default or choose to ‘test-drive’ a search provider (see Figure 4). Consumers selecting this option would then choose a search service to ‘test-drive’ and, after a short period, users would have an opportunity to either confirm they are happy for their selected search service to remain their default, or to select an alternative (either on a further ‘test-drive’ basis, or as the selected default provider). Consumers would be able to continue this process until they want to select an enduring search service default.

4.49 Google has submitted that the proposed design of the 'test-drive' function is likely to require device-side changes by OEMs, specifically to add a test-drive button, displaying a notification after the test-drive period, reshowing the choice screen if users want to test drive again, and for capturing repeated choices from the test-drive flows. Google also submitted that the test-drive function raises implementation challenges in relation to conflict with user default configuration, user widget configuration, user preference for search apps, as well as user confusion from choice screen refreshing.[82]

4.50 We recognise that the 'test-drive' function may have implications for OEMs, and are keen to consider these implications further as part of the consultation. We also propose that Google determine the length of the 'test-drive' short, defined period, potentially through user testing, but we would expect it to be in the region of 14 days. This would give consumers enough time to experience and come to conclusions about the service they are 'test-driving', while also giving them an opportunity to revisit their choice relatively promptly if they are dissatisfied.

Device-level consumer journey

4.51 As described above, we are concerned that the existing user journey to change the default search provider across multiple access points on Android devices is fragmented (see paragraph 1.15(a) above). We are concerned that while each individual step may not present excessive friction, the cumulative effort required to switch defaults across different access points could be enough to deter users from making changes in line with their preferences. This fragmented experience risks undermining user choice and engagement.

4.52 Some traditional search and AI service providers told us that, in addition to a choice screen, users should be able to easily change their default settings across multiple search access points in 'one click', for example as part of Android device settings, similar to the existing browser default settings.[83]

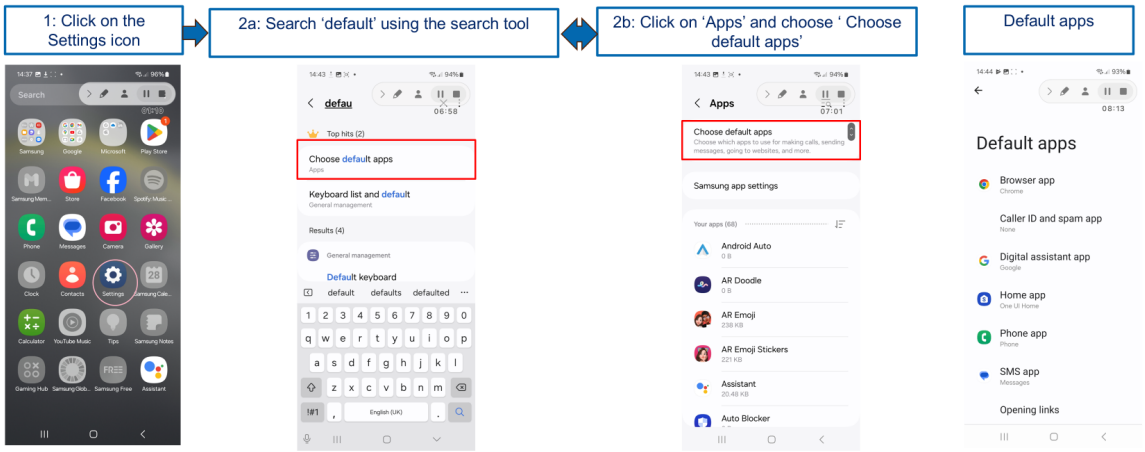
4.53 We consider that, in order to be effective in meeting our aim of enabling users to choose quickly and easily between search providers, the User Choice CR should ensure that the journey to switch the search default on Android devices is simplified. In particular, to achieve this, we are proposing to require Google to provide users with a single option to change default search services

[82] Google's submission to the CMA.
[83] Ecosia's response to the CMA's RFI. DuckDuckGo's response to the CMA's RFI. DuckDuckGo's submission to the CMA. Perplexity's response to the CMA's RFI.

at the Android operating system level for the Chrome application and Search widget.

4.54 A centralised default search setting for Android devices would allow users to select a single search provider across multiple access points at once, much like the Android Choice Screen does at device set-up. This would also be similar to existing device-level defaults for browsers and other default application categories and could be incorporated into the existing 'Default Apps' menu (see Figure 5).

Figure 5. CMA audit of user journey to access default apps categories on Samsung 24 device



Source: Screenshots taken by the CMA using a Samsung 24 device, 25 September 2025

4.55 The intention of this proposal is not to reduce or remove any of the existing configurability of individual access point settings.[84] Introducing the device-level default simply allows users to change multiple access point defaults simultaneously, should they wish to do so.

4.56 As noted below, we recognise that implementing the device-level default switch may have implications for OEMs and are keen to consider these implications further as part of the consultation.

[84] So users would still be able to download apps from the Play Store, customise their home screen widgets and app placement, and change Chrome's default search service on an Android device independently of the device default setting.

Search settings API

4.57 As set out above, we are concerned that information asymmetries in relation to default settings may limit other search providers' ability to effectively engage with users in relation to their default search settings.[85]

4.58 Currently, Google offers a Browser Default Settings API, which gives installed browser apps visibility over whether they are set as the default on the Android mobile device (including Pixel). If the browser is not the current default browser, the browser could prompt the user to make it the default browser when user starts using the app.[86]

4.59 There is currently no equivalent default search setting API,[87] so only Google has visibility over which search provider a user has selected as their default across Google-owned access points – Chrome and the Search widget. Without such information, third-party search providers may provide users with unnecessary, misdirected or confusing prompts (eg prompting a user to switch to their service even though the user has already selected them as their default). This lack of clarity may inhibit users' awareness of a range of search providers and prevent them from making active choices.

4.60 To be effective in meeting our aim, we therefore propose that the User Choice CR requires Google to introduce an API that allows eligible third-party search providers to determine whether they are currently set as the user's default on Android devices or on Chrome on desktop or iOS/iPadOS. This would mirror the Browser Default Settings API and would help third-party providers engage more effectively with their customer base.

4.61 We recognise that this requirement may have implications for OEMs, and are keen to consider these implications further as part of the consultation.

Balanced prompts

4.62 Google employs a prompt on Chrome on desktop if users install a third-party search extension, which encourages users to switch back to their previous search default (see Figure 3 above).

4.63 Google submitted that a prompt:

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[85] See paragraph 1.16(b).
[86] See Mobile Browsers and Cloud Gaming market investigation WP5, 5 July 2024, paragraph 4.62.
[87] DuckDuckGo's submission to the CMA.

(a) 'is shown whenever a search extension in Chrome seeks to change the user's default search engine, irrespective of the user's current default search engine', and that 'it is a fundamentally non-discriminatory and pro-user measure that puts the user in control'; and

(b) is intended to allow users to confirm that they intended for the extension to change their default search settings, and to 'protect users from security risks and search hijacking'.[88]

4.64 We are mindful of this risk and the importance of protecting users' data security. We therefore recognise the value of some form of prompt confirming that the consumer meant to make changes to their settings.

4.65 However, we consider that the current prompt displayed by Google does not frame the choice in a fair and balanced way, and risks unduly deterring users from switching. To meet our aim of giving users confidence in their choice of search provider and ability to choose quickly and easily between different providers, we therefore propose to require Google to employ neutral language and design in these prompts so as not to bias user decision-making.

The impacts of our proposals on Android OEMs

4.66 Our initial evidence gathering has indicated that some elements of our proposals may require Android OEMs to make changes to their devices in order to ensure their effective implementation.[89] As part of this consultation, we invite representations on the implications for OEMs of our proposals. In particular, we are keen to understand whether parts of our proposed User Choice CR, such as: (i) showing the choice screen on an annual basis; (ii) implementing the 'test-drive' function; (iii) altering the device-level consumer journey; and (iv) giving other search services access to information about a user's default search settings, would require device-side changes in order to be implemented on Android devices.

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[88] Google's response to the CMA's RFI. In particular, Google has submitted that the prompts are in place to protect consumers from extensions that load malware onto their browsers, harvesting their data through a process they call 'search hijacking' and that '[✂]% of all malware installs on Chrome are related to search hijacking, [✂]% of all extensions taken down for malware are due to search hijacking, and more than [✂] Chrome extensions seek to change the user's default search engine without prominently mentioning it to the user'.

[89] Google's response to the CMA's RFI (see also paragraph 5.18 below). [✂]'s response to the CMA's RFI.

4.67 Our further analysis on this issue, including feedback from stakeholders, will inform our final conclusions on the most effective and proportionate approach to improving user choice in search.

Implementation and Compliance

4.68 A CR comes into force at a time determined by the CMA.[90] Once in force, Google would be required to provide the CMA with a compliance report in relation to that CR[91] and the CMA would be required to keep under review the extent to which Google is complying with the CR.[92] This section sets out our proposed approach to ensure any final User Choice CR is implemented effectively and to monitoring compliance.

Approach to monitoring and compliance

4.69 We propose that the conduct requirement would come into force within six months following imposition. During this period Google should, within one month of imposition, submit an implementation plan and engage constructively with the CMA and third parties to develop and implement changes to comply with the requirement.

4.70 The CMA would employ a variety of methods to ensure compliance with the conduct requirement, including a compliance report from Google every six months, reporting of key information and data from Google, particularly with regards to how the eligibility requirements are being applied, and ongoing stakeholder engagement and feedback. We would also consider the use of behavioural audits, which could be used to explore the user journey and identify any choice architecture issues that have arisen.

4.71 The regular compliance reporting to the CMA with regards to the User Choice CR would include:

(a) An explanation of how it has complied with the User Choice CR over the relevant period, including:

(i) any updates to the implementation of its search choice architecture;

[90] Section 19(11)(a) of the Act.
[91] Section 84(1) of the Act.
[92] Section 25(b) of the Act.

(ii) Screenshots of any changes to the user journey to change the default search provider at device setup and after the device set up; and

(iii) how it has applied the eligibility criteria, including the names of any applicants to be listed as an eligible provider, the decision on their application and, if their application was rejected, the reasons for that rejection.

(b) A summary of the most frequent stakeholder feedback received with respect to the above.

4.72 As part of compliance reporting, we propose to require Google to supply the following metrics to enable us to assess the impact and effectiveness of the User Choice CR and Google's compliance with it:

(a) The number of devices that have been eligible to see the choice screens;

(b) The number of devices that have seen the choice screens and prompts;

(c) The number of users that have selected the 'test-drive' option;

(d) A breakdown of user selections for the choice screens, the 'test-drive' option and prompts;

(e) The number of users that have changed their default providers in the device-level, Chrome application and Search widget settings; and

(f) A breakdown of user selections in the device-level, Chrome application and Search widget settings.

4.73 As set out in paragraph 4.25 above, our current expectation is that Google would assess applications for eligible providers by reference to the eligibility criteria. To enable the CMA to monitor this process and ensure that the process remains fair, inclusive, and aligned with our aim, the CMA would expect Google to provide a copy of any correspondence sent to a potential search provider rejecting their application to be approved as soon as possible after that correspondence is sent to the relevant potential search provider and, in any event, within five working days.

4.74 Google would be expected to notify the CMA of any changes to the choice screens or related choice architecture in advance of any rollout. This includes sharing any user testing plans and findings. Google would also be expected to notify third-party search providers ahead of the 're-display' of the Search Choice Screen at least three months in advance.

4.75 Beyond this reporting, we would maintain regular communication with stakeholders on the User Choice CR. This would enable them to raise issues with us if they believe Google is failing to comply with the requirement.

4.76 In the interests of transparency, the CMA considers that Google should prepare a non-confidential version (alongside the confidential version) of each compliance report and related performance metrics and publish this at the same time as submitting it to the CMA. This would improve confidence in Google's compliance with the User Choice CR and enable third parties to provide further views on Google's compliance.

5. Provisional proportionality assessment for the User Choice CR

5.1 The CMA may only impose a CR if it considers that it would be proportionate to do so for the purposes of one or more of the statutory objectives, having regard to what the CR is intended to achieve (as set out in paragraph 2.1 above).[93]

5.2 This section sets out our provisional proportionality analysis for our proposed User Choice CR. A proportionate CR is one that:

(a) is effective in achieving its intended aim;

(b) is no more onerous than it needs to be to achieve its intended aim;

(c) is the least onerous CR, where the CMA has identified multiple equally effective options that would achieve the intended aim; and

(d) does not produce disadvantages that are disproportionate to its aim.[94]

5.3 We have considered each of these four criteria below. However, we will revisit our assessment of all four in light of responses to the consultation, if we decide to proceed with this CR. At this stage, our assessment focuses in detail on the fourth limb of the test.

The CR is effective at achieving its intended aim

5.4 The analysis set out above shows how the proposed User Choice CR is designed to be effective in meeting our aim.

The CR is no more onerous than necessary

5.5 The proposals we have set out aim to be effective in meeting our aim while minimising the burdens for Google and third parties. For example, we have focused on key search access points and the most relevant user journeys while acknowledging that in principle other features could be considered if their usage changes.

[93] Section 19(5) of the Act.
[94] CMA194, paragraph 3.33.

The CR is the least onerous of equally effective options that would achieve the same aim

5.6 In our effectiveness assessment we have identified the design choices that would achieve our aim. At this stage, we have not identified less onerous approaches that would be equally effective in meeting our aim.

The CR does not produce disadvantages which are disproportionate to the aim

5.7 In the assessment below, we set out the main potential costs and benefits of the proposed User Choice CR for Google and other parties and our assessment of their relative size. On the current evidence, we consider that the potential benefits outweigh the potential costs and therefore the User Choice CR would not produce disadvantages which are disproportionate to the aim. We welcome feedback on this assessment as part of the consultation.

Potential costs of the CR

Costs to Google

5.8 Google estimated that the costs of extending the choice screen to Chrome on iOS and desktop and showing the Search Choice Screen on all Relevant Browsers and Relevant Devices [would be around £5 million][95] over a five-year period.[96]

5.9 For the 'test-drive' function, Google estimated the incremental costs (above and beyond the costs in the paragraph above) to be [up to £5 million] over a five-year period. [97]

[95] Google's response to the CMA's RFI. This option also included the cost to Google of adding an information screen and making changes to its choice architecture after the device set up stage.
[96] In the proportionality assessment, we compare costs and benefits over a five-year time frame. We conservatively assume a set up period of one year, meaning we count just four years of benefits and costs to users. We discount the five-year costs and benefits using a 3.5% discount rate based on guidance issued by HM Treasury in the Green Book.
[97] Google's response to the CMA's RFI.

Costs to Users

5.10 Google submitted that showing choice screens other than at device setup may lead to users being interrupted from their tasks and forced to make search provider choices when they are not in the mental mode for doing so.[98] Google also submitted that users may be harmed by reduced browser competition on iOS and Windows due to Chrome's reduced ability to design its user experience to best serve its users.[99] Google added that any negative user experience may negatively affect the competitiveness of Android devices as Apple devices would not face the same changes.[100]

5.11 Regarding Google's concern about showing choice screens other than at device setup, we note that Google regularly interrupts users with prompts on Chrome on Android and iOS/iPadOS (see paragraph 4.34) suggesting that the frequency of choice screen display once per year we are considering is not particularly problematic. Furthermore, any negative impact on competition in browsers or mobile platforms depends on there being significant costs to users as a result of the CR that reduce the attractiveness of Chrome or Android. However, as set out in this section, such costs are very small per user (see paragraph 4.17). Therefore, we do not expect that it would significantly affect competition between Android and other operating systems or Chrome against other browsers. Further, there are larger overall benefits to users from greater use of search providers that better match their preferences.[101]

5.12 As such, we consider that the main cost to consumers is the increased time that would be spent navigating through the Search Choice Screen as the exposure and frequency of the choice screen increases. However, we also anticipate that our User Choice CR would enable the removal of the Dual Choice Screen in the UK, so users see only one choice screen when setting up devices resulting in some offsetting saving to users.

5.13 To estimate the cost to a user of showing the Search Choice Screen, we first estimate the average time spent by a user to go through the Search Choice Screen journey. Mozilla research found that the average user took roughly 25 seconds to choose their default browser from a choice screen and respond to

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[98] Google's response to the CMA's RFI.
[99] Google's response to the CMA's RFI.
[100] Google's response to the CMA's RFI.
[101] We also note that Google has produced no evidence that this is a factor that influences a user's browser or operating system choice.

a Q&A page afterwards.[102] We consider that the average user would take roughly the same time to consider the Search Choice Screen and its information screen.[103] The Mozilla research found that the average user took roughly half as much time on choice screens without a Q&A. We use this assumption to calculate the additional cost to users from showing an information screen (eg compared to the current Dual Choice Screen and Android Choice Screen which do not have information screens (or a Q&A)).

5.14 When combined with an estimate of the average value of a UK consumer's time,[104] this gives an average time cost per showing of the choice screen of a little under 14p.

5.15 We estimate that showing the choice screen annually on Chrome on desktop and iOS/iPadOS would result in an additional [15-35] million devices seeing the choice screen each year.[105] When combined with the average cost per showing of the Search Choice Screen, this gives a total cost to users of £[5-20] million over the 5-year period, or an average of £[0-5] million a year starting from year 2.[106]

5.16 On Android devices, as choice screens are already shown on device setup, we estimate the additional number of viewings as a result of showing the Search Choice Screen every year. Google submitted that in February 2025, there were [40-50] million active Android devices in the UK, which is therefore the number of additional choice screens with information screens which would

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[102] Mozilla, Can browser choice screens be effective?, accessed by the CMA on 4 December 2025, page 52.
[103] We note that the Mozilla research concerns browser choice screens, and the CR relates to search engines, however, we consider the experience of considering options and making a selection would be similar.
[104] To estimate the average value of a UK consumer's time, we use the average UK hourly wage (in line with approaches taken by the FCA and BEIS). Using ONS data on average earnings in December 2025 and average hours worked we calculate this to be £20.19. See: ONS, Average weekly earnings in Great Britain: December 2025, 16 December 2025, accessed by the CMA on 16 December 2025. See: ONS, Average actual weekly hours of work for full-time workers (seasonally adjusted), 16 December 2025, accessed by the CMA on 16 December 2025. We assumed this would grow at 0.5% a year in line with the OBR's Economic Outlook (Office for budget Responsibility, Economic and fiscal outlook, November 2025, paragraph 2.43, accessed by the CMA on 16 December 2025).
[105] This consists of roughly [10-20] million desktop devices and [5-15] million iOS/iPadOS devices. To calculate this, we have estimated the number of Chrome users on desktop (as a proxy for the number of devices) by taking Uswitch data from March 2021 and combining with Statcounter data on the Chrome desktop market share as of November 2025. We have then added the number iOS/iPadOS Chrome clients (as a proxy for the number of devices) based on data submitted to us from Google. See: Uswitch, UK Mobile Phone Statistics 2025, August 2025, accessed by the CMA on 10 December 2025; Statcounter Global Stats, 'Desktop Browser Market Share United Kingdom, accessed by the CMA on 5 January 2026; Google's consolidated response to the CMA's RFI.
[106] In calculating the total user costs, we apply an annual 3.5% discount rate based on guidance issued by HM Treasury in the Green Book.

be shown a year under this aspect of the CR.[107] Offsetting this are the [5-10] million choice screens (without information screens) that were shown at device setup on Android in 2024.[108] Additionally, we anticipate that our CR would enable the removal of the Dual Choice Screen in the UK – this results in [5-10] million fewer choice screens (without information screens) being shown a year.[109] Consequently, we estimate that showing the Search Choice Screen on all [40-50] million Android devices would represent an additional [15-35] million showings once the existing choice screens are accounted for or replaced. Overall, this results in an estimate of additional costs to users of £[10 – 25] million over the five-year period, or an average of £[0 - 10] million a year starting from year two.[110]

5.17 Where the 'test-drive' function is used, users would spend some additional time interacting with the choice screen, as they would be re-shown the Search Choice Screen some time after they first see it, so they can decide to confirm their choice or choose an alternative. While the 'test-drive' process would entail some further time cost for users, we note that the users who have decided to engage with the 'test-drive' function are likely to be receiving a net benefit as they would be able to make a more informed decision about which search provider to use, based on their experience. Furthermore, given our low estimate of the per user average cost of showing a choice screen (previous paragraph 5.14) relative to the benefit to users of choosing a provider that better matches their preferences (paragraph 5.28), it is unlikely that such costs would materially affect our assessment.

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[107] Google's consolidated response to the CMA's RFI. In line with the scope of the requirement set out in paragraph 4.33. This is a rough approximation given that choice screens would be expected to be shown at set up and on a fixed date across all eligible devices unless the device has been set up in the six months prior to the date of the annual roll out of the Search Choice Screen.

[108] Google's consolidated response to the CMA's RFI. This may be a small overestimate of the number of choice screens as some of these showing may not be avoided as they are a result of a device being reset.

[109] The Dual Choice Screen was displayed [5-10] million times in 2024.Google consolidated response to the CMA's RFI. This may be a small overestimate of the number of choice screens as some of these showing may not be avoided as they are a result of a device being reset.

[110] This is calculated by taking the [40-50] million devices and multiplying by 25 seconds (0.007 hours). Then subtracting [5-10] million devices that currently see the Android choice screen and the [5-10] million devices that see a dual choice screen. We estimate the devices that already see a choice screen take less time as there is no information screen, so we use 12.5 seconds (0.0035 hours) for user time spent on the existing screens. Once the time spent on existing screens has been subtracted, we multiply by £20.19 to calculate additional user costs from showing the new choice screen. We then apply real wage growth of 0.5% per year and discount using a 3.5% rate to calculate total costs over the 5-year period.

Costs to OEMs

5.18 Google submitted that OEMs may be required to carry out some device-side changes to enable some of the changes that are part of the CR, particularly choice screens outside of device setup and the 'test-drive' function.[111] Google submitted that this could lead to increased costs to OEMs as a result of the need to create UK specific stock-keeping units (SKUs) which in turn could lead to reduced device availability in the UK.[112]

5.19 We have not yet seen clear evidence that elements of the CR would require device-side changes by OEMs. However, we wish to understand any potential technical issues and the possible cost implications further as part of the consultation – including through discussions with OEMs – and will consider the effectiveness and proportionality of our final proposals in light of these discussions.

Summary of costs

5.20 The table below sets out the potential 5-year costs based on the calculations in this section.

Table 3. Summary of quantified costs over a 5-year period

Option	Costs to Google	Costs to users	Total costs
Choice screen on Chrome on desktop and iOS/iPadOS	[around £5 million]	£[5 - 20] million	£[10 – 25] million[113]
Annual choice screen on Android		£[10 – 25] million	£[15 – 30] million[114]
'Test-drive' function	[up to £5 million]	N/A	[Up to £5 million]

Source: CMA analysis of Google data in combination with publicly available data sources on market shares, desktop users and average wages.

Potential benefits of the CR

5.21 The two main benefits of the proposed CR are:

[111] Google's response to the CMA's RFI.
[112] Google's response to the CMA's RFI.
[113] As we do not have separate cost estimates, this figure includes the total cost to Google of both a choice screen on Chrome on desktop and iOS/iPadOS and an annual choice screen on Android.
[114] As above, this figure includes the total cost to Google of both an annual choice screen on Android and a choice screen on Chrome on desktop and iOS/iPadOS.

(a) increasing competition in general search services; and

(b) having more people use a general search provider that better matches their preferences.

5.22 The below section sets out why we consider these benefits would likely arise and their likely scale.

Benefit of increased competition

5.23 The ability to discover, choose and switch between alternatives easily is a critical component to effective competition and securing good outcomes for consumers in any market. As identified at paragraph 1.3 above, defaults play an important role in general search services. Experimental evidence has shown that choice screens increase engagement with a wider set of market competitors, increase choice comprehension, and increase confidence in decision-making, enabling consumers to exercise active choices in digital markets.[115] Choice screens lower the barriers to users switching default search provider, particularly by making choosing a search provider easier and addressing user inattention and inertia. Choice screens also help users engage more easily with search services and react to new trends by exploring different search providers.

5.24 By increasing user awareness of and engagement with the range of available search providers, an increased prevalence of choice screens would be likely to lead to increased competition in general search from the following mechanisms:[116]

(a) Search providers (including Google) have a greater incentive to compete for users. More users actively engaging with a choice of search providers increases the incentive for search providers to improve the quality of their services because such improvements are more likely to result in winning new users (or reduce the probability of losing existing ones). This in turn increases competition for advertisers, potentially imposing downward pressure on search advertising prices.

(b) Google's rivals are more likely to benefit from greater economies of scale, thereby becoming stronger competitors to Google and increasing the pressure for Google to compete for users. As Google's rivals are

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[115] Mozilla, Can browser choice screens be effective?, accessed by the CMA on 4 December 2025; BEUC, An effective choice screen under the digital markets act, accessed by the CMA on 5 January 2025.
[116] We note the current lack of engagement in this area, as discussed above in paragraph 1.15.

generally small, even small shifts in market share could significantly increase their scale. As set out in the SMS Decision, there are a range of barriers to entry and expansion related to economies of scale, ie data advantages, the costs of developing and maintaining search infrastructure and barriers to monetisation.[117] Choice screens could help rivals increase in scale, particularly in terms of click-and-query or personalisation data and make them more effective competitors to Google.

(c) Greater scope for successful innovation and disruptive long-run entry. Regularly surfaced choice screens give a clear route for rapid entry for a new disruptive entrant lowering the barriers to such entry. This would also increase the competitive pressure faced by Google when competing for users.

5.25 That choice screens may lead to greater competitive pressure on Google is supported by evidence from the US Search Litigation regarding Google's response to European choice screens that went into effect in early 2020. Google responded to the increased competition from European choice screens by launching its "Go Big in Europe" investments which were above and beyond business as usual and were meant to make sure Google is top of mind for EU users.[118]

5.26 Based on the evidence above, we consider that by increasing the prevalence of choice screens, the Use Choice CR would lead to greater competition in general search. We have not directly quantified this benefit but consider the likelihood that it would exceed the costs in the '*comparing costs and benefits'* section below.

Benefit of consumers using a preferred search service

5.27 A benefit of increasing exposure to choice screens and the other improvements to choice architecture is that some additional consumers are likely to find a search provider that better matches their preferences. As found in our qualitative research, consumers have low awareness of their current search provider options and low engagement in choosing search engines, ie not seeking out alternatives or assessing what is the most appropriate search

[117] Strategic Market Status investigation into Google's general search services: Final Decision (SMS Decision), 10 October 2025.
[118] *United States and State of Colorado v Google LLC*, Plaintiffs Proposed Findings of Fact, paragraphs 1088-1090, post-trial brief of 21 May 2025, page 317.

engine for them.[119] Some of these consumers would benefit from choosing an alternative search engine that better matches their preferences. For example, consumers that put an emphasis on privacy would likely benefit from a search engine with the same focus. This may become more common and important if new search options come into the market.

5.28 As the User Choice CR would increase the prevalence of choice screens, it would also be likely to increase the number of users that find a search service that better matches their preferences. There are a range of estimates as to the benefits an individual gains from the usage of search providers. Google's own research found that the average Google user would have to be paid £39 a month to go without access to Google.[120] This equates to £468 consumer surplus a year per user. Another piece of research estimated that for their small sample of desktop Edge users, Bing was perceived to be of higher quality relative to Google by an amount that is equivalent to a payment of $7.56 for a two-week period.[121] This equates to £149.10 per year.[122] While both figures were estimated for a different purpose and so have drawbacks, the £149.10 figure more closely aligns with the benefit we are seeking to estimate.[123] As the lower estimate, it is also more conservative, but nevertheless indicates that the benefits to an individual from selecting their most preferred search engine can be material.

5.29 The extent to which this benefit arises as a result of our User Choice CR would depend on the number of users who are exposed to a choice screen as

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[119] Thinks Insight & Strategy, SMS investigation into Google's general search and search advertising services: Exploring consumers' search behaviour - Qualitative research report (2025), May 2025, paragraphs 5.11-5.13

[120] Google asked to its 4000 survey respondents was "*Imagine you had to choose between the following options. Would you prefer to keep access to Google Search or go without access to Google Search for one month and get paid £PRICE?"* The price offered was randomised between £1.25, £2.50, £5, £10, £20, £50, £100, £200 and £500. They regressed the results of this poll to derive a demand curve and used this to calculate median consumer surplus per user. See: Public First, 'Google's Economic Impact in the UK 2023', July 2023, page 26 and page 75.

[121] Allcott et al., (2025), Sources of Market Power in Web Search: Evidence from a Field Experiment, page 29. We note that as this figure is only on desktop, and given that mobile accounted for 70-80% of total Google Search queries at the end of 2024, the value a user may place on having their preferred search engine on mobile could be even higher. See Strategic Market Status investigation into Google's general search services: Final Decision (SMS Decision), 10 October 2025, Appendix B – Market Outcomes Annex, paragraph B.8.

[122] $7.56 over two weeks is equivalent to £5.73 using Bank of England average 2025 exchange rate as of 16 December 2025. See Bank of England, GBP Exchange Rates, accessed by the CMA on 12 December 2025. Extrapolating this out over 52 weeks gives £149.10.

[123] Unlike the Google figure, the £149.10 figure is per device and is for the value of a rival compared to Google rather than the other way around. Both are also median figures and users that are likely to switch because of a choice screen seem likely to be those with weaker preferences between search engines.

a result of our CR and the extent to which they choose a more preferred search provider as a result.

5.30 As set out in the costs section above, the User Choice CR would result in the Search Choice Screen being shown on an additional [15-35] million Android devices per year and [15-35] million additional times on Chrome on desktop and iOS/iPadOS. We expect a proportion of these showings would result in users finding a more preferred search provider than they would have absent the choice screen being displayed. This number is difficult to estimate precisely and would likely vary depending on a range of factors, for example when the user last saw a choice screen and how the Search Choice Screen is designed including what options are included. However, the evidence indicates that a proportion of users are likely to choose an alternative search provider.

5.31 On Android in 2024, [a small minority] of choice screen selections were for Google competitors.[124] Although some of these users would likely have made that choice without the choice screen, this is higher than, for example, the [small minority] of macOS/OSX users (who are not shown a choice screen) who have changed to a different default search provider.[125] Past literature has found a switching rate of around 1% from choice screens.[126, 127]

5.32 As set out below when comparing the costs to the benefits, even if only a relatively low percentage of users switch, this would result in benefits that are relatively large compared to the costs.

5.33 Furthermore, although switching can give rise to benefits when it enables consumers to find a service that better meets their needs, as set out in paragraph 4.5 above, the aim of our intervention is not to encourage switching

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[124] Note: This data is based on a sample of Google users who have agreed to report data to Google. Google's consolidated response to the CMA's RFI.
[125] CMA analysis of data provided in Google's consolidated response to the CMA's RFI. We note that this data is only for MacOS and not Windows PC.
[126] Allcott et al., (2025), Sources of Market Power in Web Search: Evidence from a Field Experiment, page 2. Allcott et al found 1.1% of users switched to Bing from Google after being asked to make an active choice, ie being asked what search engine they would like to be their default and receiving detailed guidance to implement their choice. Decarolis et al., (2025), Competition and Defaults in Online Search, SSRN, page 15. Decarolis et al found that following the introduction of choice screens in the EEA after March 2020, Google's market share in EEA countries decreased as a result by between 0.5 and 1.5 percentage points.
[127] We also note that DuckDuckGo published research that indicated a search preference menu could result in a 20% drop in Google market share depending on the way it was designed, showing the impact that changes to choice architecture practices could have on market shares. See DuckDuckGo, Google Search Mobile Market Share Likely to Drop Around 20% through Search Preference Menus, August 2020, accessed by the CMA on 10 December 2025.

per se, but instead to ensure that consumers are able to make an active and informed choice about which service they use and to encourage competition. The benefits of increased competition, highlighted above, could flow to all users, whether or not they choose to switch away from Google.

Comparing the costs and benefits

5.34 In this section we bring together the evidence on the costs and benefits and consider their relative size.

5.35 We first compare the benefits of increased competition to the total costs of the proposed User Choice CR, calculating the benefit that would need to arise through this mechanism alone for the benefits of this CR to outweigh the costs.

5.36 We then undertake a similar assessment for the benefit of having a preferred search service. In this case we set out, for each part of this User Choice CR, the quantified costs and calculate the required number of additional users that would need to choose a search provider that better matches their preferences for this benefit alone to outweigh those costs. We do this comparison over a five-year period. We then consider the unquantified costs and benefits and how they would likely impact the overall comparison of costs and benefits.

5.37 We compare the benefits of increased competition and the benefits from users having their preferred search service against the total costs separately. This conservative approach means that if one part of the User Choice CR, if implemented, resulted in less benefit than originally forecast, other benefits resulting from it would likely cause it to remain proportionate. Necessarily, these comparisons do not include unquantified costs, such as any costs for OEMs. We will continue to refine our understanding of these costs as we receive further evidence.

Increased competition

5.38 In relation to this benefit, we note that a CR that is effective in increasing the competitive pressure faced by Google and increasing the incentive for its rivals to compete in general search services would be likely to have large benefits, particularly relative to the costs of the User Choice CR, given that:

(a) Google has more than [60-70] million users in the UK[128] and estimates that its median user values Google at £500 per year.[129] If increased competitive pressure on Google led to an improvement in user experience equivalent to [15-25]p per year (a small proportion of the £500 per year value estimated by Google), this benefit alone would outweigh the total costs of the User Choice CR over the 5-year period.[130, 131]

(b) In 2024, Google generated £[10-20] billion of search advertising revenue from users in the UK.[132] If increased competition led prices to fall by [0-0.5]%, the benefit of this to advertisers would outweigh the total forecasted costs of implementing the choice screen outlined in the section above.[133]

Preferred search provider

5.39 We set out below, for each part of the proposed User Choice CR, the quantified costs[134] and provide illustrative calculations of the required number of additional users that would need to choose a search provider that better matches their preferences for this benefit alone to outweigh the total quantified costs of the CR.[135, 136]

5.40 At paragraph 5.28, we described how there is a range of evidence on the value to users of selecting a search provider that better matches their preferences. For the purposes of the illustrative calculations described below we use the £149.10 per year figure (see paragraph 5.28) because it more

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[128] Strategic Market Status investigation into Google's general search services: Final Decision (SMS Decision), 10 October 2025, paragraph 5.276(b). This is the number of logged-in users of its general search services on mobile as of December 2024. Google had a further [20-30] million logged-in users on desktop as of December 2024. A single individual may account for multiple logged-in users.
[129] Public First, Google's Economic Impact in the UK 2023, July 2023, pages 26 and 74, accessed by the CMA on 8 December 2025.
[130] Based on Table 3 above, we consider the maximum costs for the User Choice CR over the 5-year period would be £[✂]. This is done by adding all the Google costs in the table to the user costs.
[131] £[✂] *[✂] * four years (ie allowing a one-year build) = £[✂] which exceeds the maximum five-year cost outlined in Table 3 above when combining costs to Google with costs to users. Increased competition would also likely mean that users of other search providers would also benefit from improvements to user experience.
[132] Based on Google's consolidated to the CMA's RFI.
[133] £[✂] *[✂] %*four years (ie allowing a one-year build) = £[✂] which exceeds the maximum five-year costs outlined in the table above.
[134] Which at this stage excludes any potential costs to OEMs.
[135] That is before considering the benefit of increased competition discussed above.
[136] We do these comparisons over a five-year period.

closely aligns with the benefit we are seeking to estimate.[137] As the lower figure it is also conservative.

Extending the Search Choice Screen to Chrome on iOS/iPadOS and desktop devices

5.41 Extending the Search Choice Screen to Chrome on iOS/iPadOS and desktop results in total costs over the 5-year period of up to £[25] million.[138] If we assume a benefit to users of switching to a service that better matches their preferences of £149.10, then the benefits to users would exceed the costs to Google and users if there were at least roughly [30,000-50,000] additional switches per year. This represents less than [0-0.5]% of the additional devices that would be shown the choice screen each year.[139] We consider that the number of switches would be likely to be higher than this because past literature has found a switching rate of at least 1% from choice screens.[140, 141]

5.42 Google submitted that users of Chrome on non-Android devices have already implicitly selected Google Search by choosing Chrome and so forcing a choice screen upon these users therefore disrespects the user's decision to use Chrome based on the way Chrome is designed and introduces friction into the user experience.[142] We do not consider that actively choosing Chrome as a browser involves an active choice of Google Search as a search provider, not least because a small but significant number choose alternative

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[137] Unlike the Google figure, the £149.10 figure is per device and is for the value of a rival compared to Google rather than the other way around. Both are also median figures and users that are likely to switch because of a choice screen seem likely to be those with weaker preferences between search engines.
[138] See Table 3 above. [✂]. We also note that as we don't have separate estimates, this figure includes the total cost to Google of both a choice screen on Chrome on desktop and iOS/iPadOS and an annual choice screen on Android.
[139] This switching figure is calculated using the time discounted benefit of switching so that the benefit of all the switches over the 5-year period would be equivalent to the total discounted costs over the same period. The percentage is calculated using an assumption that [15-25] million additional devices would be shown the Search Choice Screen.
[140] Allcott et al., (2025), Sources of Market Power in Web Search: Evidence from a Field Experiment, page 2. Allcott et al found 1.1% of users switched to Bing from Google after being asked to make an active choice, ie being asked what search engine they would like to be their default and receiving detailed guidance to implement their choice. Decarolis et al., (2025), Competition and Defaults in Online Search, SSRN, page 15. Decarolis et al found that following the introduction of choice screens in the EEA after March 2020, Google's market share in EEA countries decreased as a result by between 0.5 and 1.5 percentage points.
[141] We also note that DuckDuckGo published research that indicated a search preference menu could result in a 20% drop in Google market share depending on the way it was designed, showing the impact that changes to choice architecture practices could have on market shares. See DuckDuckGo, Google Search Mobile Market Share Likely to Drop Around 20% through Search Preference Menus, August 2020, accessed by the CMA on 10 December 2025.
[142] Google's response to the CMA's RFI.

search providers.[143] Desktop Chrome users are currently not shown a choice screen and [a small minority] of macOS/OSX users had a default search engine other than Google,[144] compared to [a small minority] of users on Android who selected a Google competitor through the choice screen.[145] This difference is consistent with choice screens leading users to make more active choices.

Showing the Search Choice Screen annually on Android

5.43 Showing the Search Choice Screen annually on Android, as opposed to just on device set up, results in additional costs over the 5-year period of up to £[30] million.[146] If we assume the benefit from search defaults better matching a user's preferences is £149.10, then the benefits to users would exceed the costs to Google and users if there were at least roughly [30,000 -50,000] additional switches per year. This is equivalent to less than [0-0.5]% of the additional times that choice screens are shown resulting in a switch.[147]

5.44 In terms of whether this level of additional switching would be likely, we note that Google submitted that users would have already been presented with a choice screen at device setup and this is users' most preferred choice moment.[148] Google further submitted that reshowing a choice screen at another point risks undermining the informed choices users made at a more suitable choice moment due to a desire to click through the screen to return to a task that was interrupted.[149] As set out above, we accept there is a cost to users of resurfacing the choice screen more frequently, however, choices made at device setup would not necessarily permanently reflect users' preferences. Users' preferences and the available options may change from one year to the next, particularly as new products are developed. As such, we

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[143] CMA analysis of data provided in Google's consolidated response to the CMA's RFI. We note that this data is only for MacOS and not Windows PC.
[144] CMA analysis of data provided in Google's consolidated response to the CMA's RFI. We note that this data is only for MacOS and not Windows PC.
[145] Note: This data is based on a sample of Google users who have agreed to report data to Google. See: Google's consolidated response to the CMA's RFI.
[146] See Table 3 above. To be conservative, we use the top of the range of costs given by Google. We also note that as we don't have separate estimates, this figure includes the total cost to Google of both an annual choice screen on Android and a choice screen on Chrome on desktop and iOS/iPadOS.
[147] This switching figure is calculated using the time discounted benefit of switching so that the benefit of all the switches over the 5-year period would be equivalent to the total discounted costs over the same period. The percentage is calculated using an assumption that roughly [✂] million additional devices would be shown the Search Choice Screen per year. This figure is based on [✂] million active Android devices and then subtracting [5-10] million choice screens shown last year along with [5-10] million dual choice screens.
[148] Google's response CMA's RFI.
[149] Google's response to the CMA's RFI.

consider that the low level of switching set out in the previous paragraph would be likely to occur given the evidence on switching rates due to choice screens cited in paragraph 5.41.

Implementing the 'test-drive' function

5.45 Implementing the 'test-drive' function results in additional costs to Google of up to £[5]million when discounted over the 5-year period.[150] If we assume the additional benefit from search defaults better matching a user's preferences is £149.10,[151] then the benefits to users would exceed the costs to Google and users if there were at least roughly [5,000 – 10,000] additional switches per year. This is equivalent to around [0 – 0.05]% of choice screen viewings. There is evidence in the academic literature that users' preferences for search providers can change following short trials of alternatives.[152] As such, we expect that this level of additional switching is very likely to occur.

Unquantified costs and benefits

5.46 As set out above, even on conservative assumptions, we consider the benefit of increasing the number of people who choose a search service better matching their preferences would be likely to outweigh the quantified costs. There are also unquantified benefits from the potential to increase competition and innovation in general search, especially in the long term, which, as set out above, could be very large. There are also potential unquantified costs, particularly to OEMs, as discussed above. The evidence does not currently indicate that any unquantified costs are likely to exceed the potential benefits (quantified or unquantified) we have described above.

Provisional conclusion on proportionality

5.47 Our overall provisional assessment is that the benefits of these measures could significantly outweigh the costs.[153] We will continue to refine our

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[150] To be conservative, we use the top of the range of costs given by Google. Google's response to the CMA's RFI.

[151] As noted at paragraph 5.17 there would likely be an additional cost to users from the 'test-drive' function but this cost would likely be small relative to the benefit of a user selecting a provider which better matches their preference and for simplicity we have used the same £149.10 figure as the net benefit.

[152] Sources of Market Power in Web Search: Evidence from a Field Experiment, Allcott et al, p19. The paper's results suggest that users that were exposed to Bing for two weeks had improved perceptions of Bing after exposure. The Potential Anticompetitive Stickiness of Default Applications: Addressing Consumer Inertia with Randomization, Duque, 2022. Data from the paper data suggest that consumers' misperceptions about Google alternatives' quality are an important obstacle to their market penetration.

[153] We have not identified relevant notable impacts of this intervention for people with protected characteristics.

understanding of the costs and benefits of the measures (particularly in relation to the potential costs for OEMs, as identified above) as part of the final proportionality assessment, to inform our decision about whether to impose the User Choice CR.

6. Questions for consultation

6.1 We welcome views on any aspect of the User Choice CR design or analysis set out above, but are particularly interested in stakeholder feedback on the following questions:

(a) Do you agree with the key design options we have considered in terms of effectiveness for the User Choice CR, including:

(i) Coverage of the Search Choice Screen

(ii) Eligibility criteria to appear on the Search Choice Screen

(iii) Determination of the list of eligible providers that would appear on the Search Choice Screen, and what role (if any) the CMA should play in that process

(iv) Frequency of display and timing of the Search Choice Screen

(v) Design of choice architecture on the Search Choice Screen

(vi) Option to 'test-drive' search providers on the Search Choice Screen

(vii) Device-level consumer journey to change default search provider on Android devices

(viii) Third-party access to a user's default search setting

(ix) Prompts displayed by Google that may inhibit effective user choice

6.2 Do you agree with our proposals for compliance reporting and monitoring, in particular:

(a) Do you agree that Google should provide 6-monthly compliance reports with metrics identified above broken down into monthly periods?

(b) Do you agree that Google should provide a copy of any correspondence sent to a potential search provider rejecting their application to the CMA?

6.3 Do you agree with our proportionality assessment for the User Choice CR?

6.4 What are the likely costs for OEMs arising from each of the design elements set out in this chapter?