

# DuckDuckGo's response to the CMA's consultation on the user choice conduct requirement (CR) for Google's general search services

[DuckDuckGo is an Internet privacy company](#) whose search engine, browser, and extensions help millions of people take back control of their personal information — without sacrificing a quality experience. We are the **third most popular search engine in the UK, which is our largest market and employee footprint outside the United States.**

DuckDuckGo has closely followed — and actively contributed to — the CMA's work on search competition since the launch of its online platforms and digital advertising market study in July 2019. Nearly six years, multiple investigations, the enactment of the DMCCA and a landmark SMS designation later, **we are finally at the point of binding conduct requirements.** We strongly welcome this moment — the case for intervention has been thoroughly made. It is now critical that the CMA delivers fully on the ambition of this proposed CR. The stakes could not be higher: AI is transforming how people find information online, and the same structural advantages that entrenched Google's dominance in traditional search will be deployed to lock in that dominance in AI-powered search unless the CMA acts with full force. The window to shape that transition in users' interests is open right now.

Our goal with this present submission is to elaborate on some of the critical design and eligibility choices which will determine the success or failure of this CR. Echoing our [previous submission](#), we strongly support the inclusion in the draft CR of:

- **An annual choice screen rollout** on a fixed date, with advance notice to participating providers;<sup>1</sup>
- A **centralised one-click search default setting** on Android<sup>2</sup>;
- Removal of Google's **asymmetric "change back to Google?"** prompt on Chrome<sup>3</sup>.

We also welcome the CMA's approach of grounding choice screen design in behavioural evidence.

However, the success of the CR in addressing the CMA's stated goals of increasing consumer awareness and engagement with alternative search providers and facilitating frictionless choice is dependent on the **design and eligibility framework working together.** On **design**, we urge the CMA to adopt requirements that optimise for these goals:

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<sup>1</sup> CMA, Consultation: User Choice Conduct Requirement — Google's general search services, 28 January 2026, paragraph 4.33 and draft Conduct Requirement paragraph 2(b) (Section 3). (*Infra*: "Proposed CR")

<sup>2</sup> Proposed CR, paragraphs 4.51–4.56.

<sup>3</sup> Proposed CR, paragraphs 4.62–4.63

- **Full randomisation** of the search providers on the choice screen, ensuring equal visibility of all providers instead of increasing that of the largest ones;
- **Forced scroll** to surface the full list of options;
- **Twelve providers** to ensure that all smaller providers have an opportunity to be selected;
- **One app** per corporate group, to avoid favouring larger companies with multiple apps over smaller providers which often only have one app.

On **eligibility**, the integrity of those design choices depends on an accurate, fair and objective assessment of which providers address all key search use cases, including navigational queries.<sup>4</sup> We therefore urge the CMA to anchor market share assessments in privacy-respecting and referral-based market share data from **Cloudflare Radar**, rather than Statcounter or Play Store install counts – sources that don't properly reflect search engines' market shares. We also propose further design improvements to enhance the visibility of alternatives, including never placing Google in the top positions.

Besides the critical design and eligibility concerns above, we urge the CMA to address the following structural conditions that constrain the effectiveness of any choice architecture:

- **Require deep-link URIs<sup>5</sup>** to default search settings on Android and Chrome, to make the Search Settings API actionable for third-party providers;
- **Reduce or eliminate the system privilege conferred on the Google app**, including by capturing locked Android access points (e.g. web component of on-device search).

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<sup>4</sup> Accent, Mobile Consumer Survey: Search Questions – Final Report, prepared for the Competition and Markets Authority, June 2025, pp. 5–6 (four use cases and method used most often, Figure 2) and pp. 7–8 (AI product usage by use case, Figures 3 and 4).

<sup>5</sup> URI (Uniform Resource Identifier): a standard identifier that points to a specific location within a system, such as a settings screen on a mobile device.

## 1. Enabling fair choice yields real results, but existing implementations have fallen far short of their potential

The CMA notes<sup>6</sup> that past choice screens have produced a switching rate of around 1%. We consider that figure a floor set by structurally deficient implementations, not a ceiling. Past interventions focused almost entirely on the choice screen interface while leaving aside issues that are at least as important — who sees the choice screen, and what effects it has:

- **Rollout timing and coverage:** Google rolled out the DMA choice screens in an opaque, patchy, and slow manner, not covering the entirety of the Android user base — and just once per device;<sup>7</sup>
- **Access point gaps:** the effect of choice screens on Android access points beyond Chrome and the Search widget was not addressed.

Crucially, so far **switching frictions have been left untouched:**

- **Switching search default** on Android still involves at least a dozen steps as there's no OS-level search default setting and ability to re-direct to it in-app;<sup>8</sup>
- **The "change back to Google"** prompt remains in place on Chrome for all popular search extensions, even in countries subject to the DMA, despite being demonstrably and severely damaging.

The net result is that Google has largely maintained its market share following the DMA, and in some markets (e.g. the browser market) grown it: the European Commission's investigation to improve user choice on iOS did enhance browser diversity but in doing so boosted Chrome, without applying the same principles to Android. For instance, Android hasn't been required to place the chosen app on the "hotseat", or to ensure its search choice screen isn't shown to non-Google default users — although equivalent interventions were required on iOS.

The CMA's proposed CR shows it is determined to fix these dead angles. Crucially, the CMA is right to capture every Google platform, including Chrome outside Android, where Google is the default. The US v. Google search litigation confirmed that Google's search monopolisation strategy has been built on securing all access points save Edge — and the same strategy is now being extended to AI.

The EU's DMA choice screen, introduced in March 2024, offers a better baseline than the legacy Android search choice screen currently shown in the UK. In countries where our brand recognition is comparable to that in the UK, DuckDuckGo's selection rates **increased by approximately +40% following its rollout** compared with the older choice screen version on Android. This was achieved despite Google rolling out the updated

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<sup>6</sup> Proposed CR, paragraph 5.31

<sup>7</sup> DuckDuckGo, 'Roadblocks to Competition: Investigate Google's Non-Compliance with the EU's Digital Markets Act', Spread Privacy (blog), 20 November 2024, available at: <https://spreadprivacy.com/investigate-google-dma/>

<sup>8</sup> The Washington Post's Android demo in their [November 2023 article on Google's search defaults](#) remain valid.

screens in an opaque, patchy, and slow manner, with no ability for providers to plan marketing campaigns around a known date. The CMA's proposed **fixed annual display date** with advance notice directly addresses this gap. We expect the uplift to be significantly higher as a result.

Our own retention data further shows that users who actively chose DuckDuckGo via a choice screen show materially stronger long-term retention and usage than those who found and installed us independently. The act of being presented with an informed choice affecting multiple access points produces not just installs but engaged users. This is consistent with the academic evidence cited in the consultation<sup>9</sup> and with the consumer behaviour research the CMA references throughout.

## 2. We strongly support the CMA's core proposals

### 2.1 Annual mandatory display with a fixed date and advance notice

**Displaying the choice screen annually**, as proposed by the CMA, is essential for two reasons. First, the CMA found that for millions of UK users, existing choice screens have been shown at most once or twice since they started rolling out in 2020. Annual re-display is the minimum required to give users a genuine, ongoing opportunity to reconsider and to learn more about competing search engines. As we found when Apple was required to re-surface a browser choice screen on iOS in the EU, the impact on DuckDuckGo app installs of a second showing 8-9 months later was comparable to the first, revealing consumer appetite for choice. At the same time, respondents to a survey we ran showed that aided recall of the choice screen remained low — indicating that even users who had seen it once were not strongly anchored to their previous choice, supporting the case for re-display. Additionally, respondents expressed higher satisfaction after seeing the choice screen a second time.<sup>10</sup>

We support the CMA's proposal to require that **Google notifies eligible providers** at least three months in advance and to treat unilateral changes to display timing as a compliance failure. The three-month clock should run from the date Google provides full implementation details, including device coverage and any A/B testing parameters, not merely from a high-level announcement.

**The choice screen must also be non-skippable.** We support this without qualification. A dismissible choice screen is not a meaningful choice screen: if dismissible, Google would almost certainly use subtle design techniques — such as placing the dismiss action prominently or making it the default tap target — to push the majority of users past the screen without engaging with it.

**The choice screen should not be displayed to users who have already set a non-Google search engine as their default.** Such users have demonstrably made an active, deliberate choice to use an alternative provider, and presenting them with a choice screen would be unnecessary and potentially counterproductive. The purpose of the remedy is to address the competitive harm arising from *Google's* ubiquitous defaults —

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<sup>9</sup> Proposed CR, Allcott et al. cited in paragraph 5.31

<sup>10</sup> 69% of users wanted to see the choice screen again after one exposure, rising to 71% after the second exposure.

that is, the status quo bias/default effect that prevents users from meaningfully considering alternatives. Where a user has already overcome that bias, this harm is absent. The CMA should therefore require that the choice screen be targeted exclusively at users for whom Google Search remains the default, ensuring the remedy addresses the actual source of competitive distortion.

## 2.2 Elimination of the asymmetric "Change back to Google" prompt in Chrome

We welcome the CMA's proposed Balanced Prompts requirement.<sup>11</sup> The "**Change back to Google Search?**" prompt shown on Chrome on desktop when a user installs a third-party search extension is, in our direct experience, one of the most damaging dark patterns in the search ecosystem.

**The prompt is not neutral.** It is conspicuously branded with the Google logo and a coloured call-to-action to "change it back", and frames the user's deliberate choice to switch as something that needs to be reversed. About 50% of users who install DuckDuckGo's search extension on Chrome become inactive over time due to these repeated prompts (**Annex 4**). While Google recently updated its extension policy to exempt extensions solely designed to change a search default URL, this exemption is so narrow as to be meaningless in practice: any extension that does anything beyond changing the default URL — including opening a welcome page, offering privacy protections, or customising the address bar — still triggers the prompt. As a result, not a single popular search extension, including ChatGPT Search, Ecosia, Bing, Perplexity Search, and Yahoo, is currently exempt. This reveals **the policy for what it is: not user protection, but a mechanism to preserve Google's dominance.**

We support the requirement that any such prompt must be balanced and must not use Google branding in a way that biases the user. An appropriate design reference is Chrome's own notification and location access system dialogue for websites: **neutral, unbranded, with equivalent visual weight for each option and no pre-selected preferred outcome.**

## 3. Maximising the visibility of alternatives to fulfil the CMA's own design principles

We strongly welcome the CMA's decision to ground choice screen design in its three core principles — that choice architecture must be **balanced, targeted, and understandable.**<sup>12</sup> These provide a robust framework for evaluating specific design choices. A genuinely balanced choice screen presents all options with equal visual weight; a genuinely targeted one ensures users encounter the full range of alternatives at the moment most likely to prompt engagement; a genuinely understandable one does not allow structural presentation effects to substitute for informed consideration. These principles, applied consistently with the CR's stated goals, must result in interventions that **increase consumer awareness and engagement with alternative search providers.**

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<sup>11</sup> Proposed CR, paragraphs 4.62–4.68

<sup>12</sup> Proposed CR, paragraph 3.3

### 3.1 Full randomisation across all options instead of a 5+7 tiered structure

We welcome the CMA's proposal that **Google lists a dozen providers**, as more diversity – up to a certain limit – typically generates more interest in alternatives.<sup>13</sup> We believe, however, that the **full randomisation of options** instead of the proposed 5+7 tiered structure is the best way to uphold the design principles. Indeed, under any tiered design, Google would be guaranteed at least one top slot, possibly more, thereby boosting its selection rate. To maximise visibility, the opposite intervention has proven to be impactful: research by BEUC showed that the “positive friction” of placing Google further down the list increases the percentage of users selecting a competing app.<sup>14</sup>

The proposed **Test Drive** function will further enhance choice. Allowing users to try a search provider for a defined period before confirming their choice is well grounded in behavioural evidence: Allcott et al.<sup>15</sup> find that two weeks of exposure to an alternative improves users' perceptions of it. We suggest the CMA specify a testing timeframe around these two weeks, rather than leaving duration entirely to Google's discretion. Importantly, the CMA should ensure the Test Drive period ends with a dialog asking the user to confirm whether they want to stick with their trial choice. If they don't, the choice screen should be shown again, rather than automatically setting the default to Google Search.

### 3.2 Options should be limited to one app per corporate group

Full randomisation addresses how options are ordered, not which options appear. In practice, the CMA should also **limit each corporate group to one slot across the full list of twelve**.

Absent this requirement, Google would benefit because it has separate search and AI apps, in an environment where most providers offer a single main app. One slot per corporate group ensures the choice screen presents users with a genuinely balanced range of independent alternatives, in line with the "balanced" principle.

### 3.3 Eligibility criteria that make sense for users

We support the CMA's proposed eligibility criteria,<sup>16</sup> which are appropriately technology-neutral while effectively filtering out those AI chatbot products that are primarily marketed and used for non-search use cases. The CMA's own consumer survey showed that on average, only 7%/13% of respondents use AI most often when searching for a product to buy / for a specific website.<sup>17</sup> While usages evolve and products differ, objective criteria should be used to ensure that only apps that “adequately address the

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<sup>13</sup> In Mozilla's choice screen study, people actively preferred the 12-options browser choice screen that was presented to them over the 5-options screen. Jesper Akesson, Michael Luca, Gemma Petrie and Kush Amlani, 'Can Browser Choice Screens Be Effective? Experimental Analysis of the Impact of Their Design, Content and Placement' (Mozilla, 2023), available at: <https://research.mozilla.org/files/2023/09/Can-browser-choice-screens-be-effective-Mozilla-experiment-report.pdf>

<sup>14</sup> BEUC, *An effective choice screen under the Digital Markets Act*, October 2023

<sup>15</sup> Cited in Proposed CR, paragraph 4.47

<sup>16</sup> Proposed CR, paragraph 4.22

<sup>17</sup> Accent, *Mobile Consumer Survey: Search Questions, Final Report*, June 2025.

full range of use cases of a general search engine on a wide range of subjects by searching the web”<sup>18</sup> are listed.

In order to measure popularity, we urge the CMA to rely on **Cloudflare Radar's search engine market share** data,<sup>19</sup> offering the twofold benefit of **reliability** and of pre-selecting those search engines effectively used for navigational queries (one of the key search use cases). Cloudflare Radar measures actual search traffic across access points, covering 18–25% of global Internet traffic, and is superior to the alternatives for the following reasons:

- **Statcounter** relies on invasive trackers that privacy-protective browsers and extensions systematically block, making it structurally biased against privacy-focused alternatives; its narrow website sample (<0.5% of Internet traffic) also makes it relatively easy to game.
- **Play Store install counts** capture all app use cases, not just search — a critical flaw given that, as the CMA's own survey data confirms, AI chatbots are heavily used for non-search purposes.
- **Cloudflare Radar**, by contrast, is unaffected by tracker-blocking and directly measures usage for web search queries, which is precisely what the eligibility criteria require.

As a supplementary criterion, the CMA could also require evidence that a meaningful proportion of users on browsers where it is technically possible have voluntarily set the candidate service as their default search provider.

## 4. Structural choice architecture interventions to achieve the CR's goals

### 4.1 Deep-linking to search default settings must be explicitly required

The CMA proposes a Device-Level Default Setting on Android and a Search Default Setting API,<sup>20</sup> both of which we support. However, there is a significant gap in the current drafting: there is no explicit requirement that Google permit deep-link URIs (that allow third-party providers to direct users from within their own app or website directly to the relevant default search settings screen — either on Android or within Chrome).

Deep links are the mechanism that makes the Search Settings API actionable. Without them, a provider can learn that a user has **not** set them as default but cannot frictionlessly prompt them to change it. The Browser Default Settings API<sup>21</sup> enables exactly this for browser defaults. The search equivalent must work the same way.

We recommend the CMA explicitly require that the Device-Level Default Setting on Android and the equivalent setting within Chrome **be accessible via documented deep-link URIs**, made available to all eligible providers as part of the Search Settings API

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<sup>18</sup> Proposed CR, paragraph 4.22

<sup>19</sup> Find the latest report for Q4 2025 here: <https://radar.cloudflare.com/reports/search-engine-market-share-2025-q4>

<sup>20</sup> Proposed CR, paragraphs 4.57–4.61

<sup>21</sup> Proposed CR, paragraph 4.58

specification. Any "search hijacking" concern is better addressed through the Balanced Prompts requirement and a system dialogue analogous to the default browser dialogue — not through restricting deep links. The default browser setting on Android already operates on this basis without giving rise to widespread abuse.

## 4.2 Making user choice effective: reducing Google Search's system privilege

We acknowledge that this CR is primarily about user choice and UI. However, the CMA cannot achieve its stated aim without also reducing, as much as possible, Google Search's status as the real underlying system level default. On Android, this privilege manifests in several concrete ways, such as:

- Several access points are locked to Google, like Circle-to-Search, as explained by the CMA;<sup>22</sup>
- If the user-chosen default app is subsequently uninstalled, the search widget silently reverts to Google Search without prompting the user to make a new choice;
- Google Search is pre-installed and cannot be deleted.

Together, these features signal to users — regardless of what they selected on the choice screen — that Google is the "real" default. This system privilege has a strong and measurable impact on user psychology:

- The introduction of a choice screen **impacting various access points** at once — the first dent in Google's system privilege — improved our retention metrics;<sup>23</sup>
- Subsequent steps, **such as placing the chosen app on the home screen dock**, produced further material improvements in retention and searches per app. Apple's latest DMA choice screen iteration introduced this improvement — its previous version had placed the chosen app on the last screen, as Android still does today. This demonstrates the value to users and competitors alike for their app to be perceived as the "real" default.

This logic extends to four specific requirements:

- **On-device search access points.** The CMA acknowledges that certain access points are locked to Google. The traffic volumes provided are helpful because this is data Google only can access. However, we note that the CMA did not analyse the importance of the **web component of on-device search**, despite the increasing deployment of such features across operating systems. We regret the decision not to include these access points in the initial CR, as these are precisely those through which Google is expanding AI-powered search, and their volumes will grow. Should the CMA confirm its approach, we urge the CMA to include an explicit review trigger at the 12-month compliance stage to assess whether extension of the CR to locked access points is warranted.

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<sup>22</sup> Proposed CR, paragraphs 1.10 and 4.16.

<sup>23</sup> Annex 5 cited in *supra*, section 1

- **Placing the chosen search app on the home screen and dock.** When a user selects an alternative search provider, the Google Search app should be replaced by the chosen app wherever it appears on the device — whether on the home screen or in the dock — rather than remaining prominently placed while the chosen app is relegated to a later screen. [Research by Open Web Advocacy](#) demonstrates that Google's failure to align with Apple's practice in the EU undermines user choice even where an active selection has been made.
- **State management logic.** The CR must ensure that the choice screen is re-triggered if the initially chosen app is uninstalled.
- **Enabling uninstallation of Google apps** the same way other apps can be uninstalled. This might incur moving system functions out of the Google apps.

## 5. The search market can quickly diversify in the UK

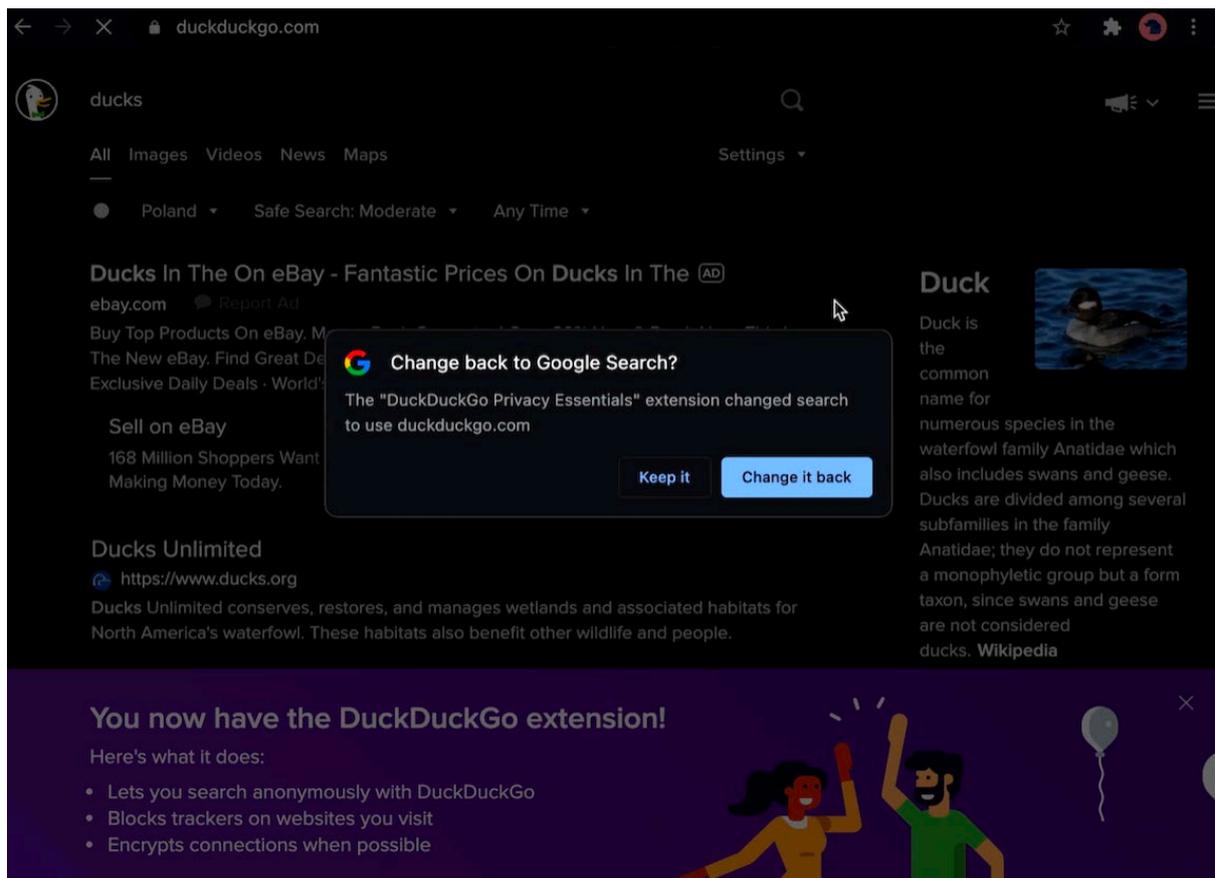
Properly implementing this CR to maximise frictionless user choice is an **essential step towards diversifying search market shares**. But it is not sufficient on its own. **Supply-side interventions** — the licensing of Google's search results and access to click-and-query data — must work alongside it to address the underlying scale advantages Google has built up by excluding competitors from distribution points for years. Opening up distribution channels without tackling these supply-side chokepoints risks solving one side of the equation while leaving the other untouched.

**We urge the CMA to prioritise these supply-side remedies in parallel** and to design them specifically for the UK market. There is no reason to wait for the outcome of *United States v. Google*: that process will take several more years to resolve, any remedy will apply only to US users and US data, and the costs borne by UK consumers and businesses from Google's entrenched market power will only mount in the meantime.

Ultimately, the benefits of market diversification will extend well beyond the search market itself. UK businesses and consumers will collectively save billions of pounds of advertising expenses stemming from increased competition in search advertising. The UK will strengthen its position as a place where Internet and AI firms invest and hire. These interventions will give us strong incentives to ensure our AI and privacy innovations reach the UK first. With the right competitive conditions in place, the UK will become the most dynamic market for innovation in search for a wide range of UK and international companies.

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

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



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

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

### Why is this exemption policy meaningless?

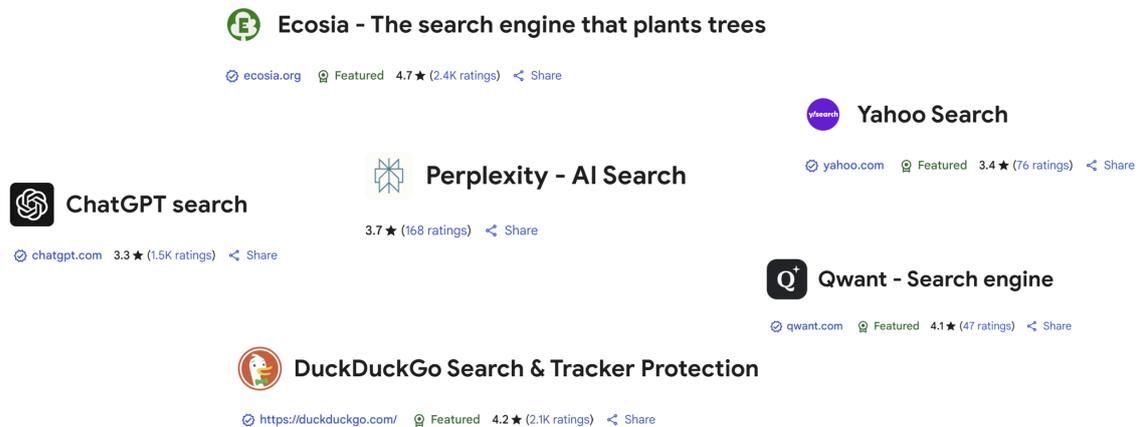
Google claims that this extension policy is meant at preventing abuse, e.g. a gaming extension which would covertly change the search default.

The reality is that the policy has been so designed as to harm search competitors in the guise of preventing abuse :

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

The very narrow policy explains why not a single popular search extension, all tested on February 23, 2026, is exempt from triggering the change-back popup. This is despite all these extensions clearly displaying that they change the search default (**fig.2**) - we invite the CMA to test for themselves on Chrome:

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



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

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

### So what should be done about it?

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

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

### Why is the extension so important?

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

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

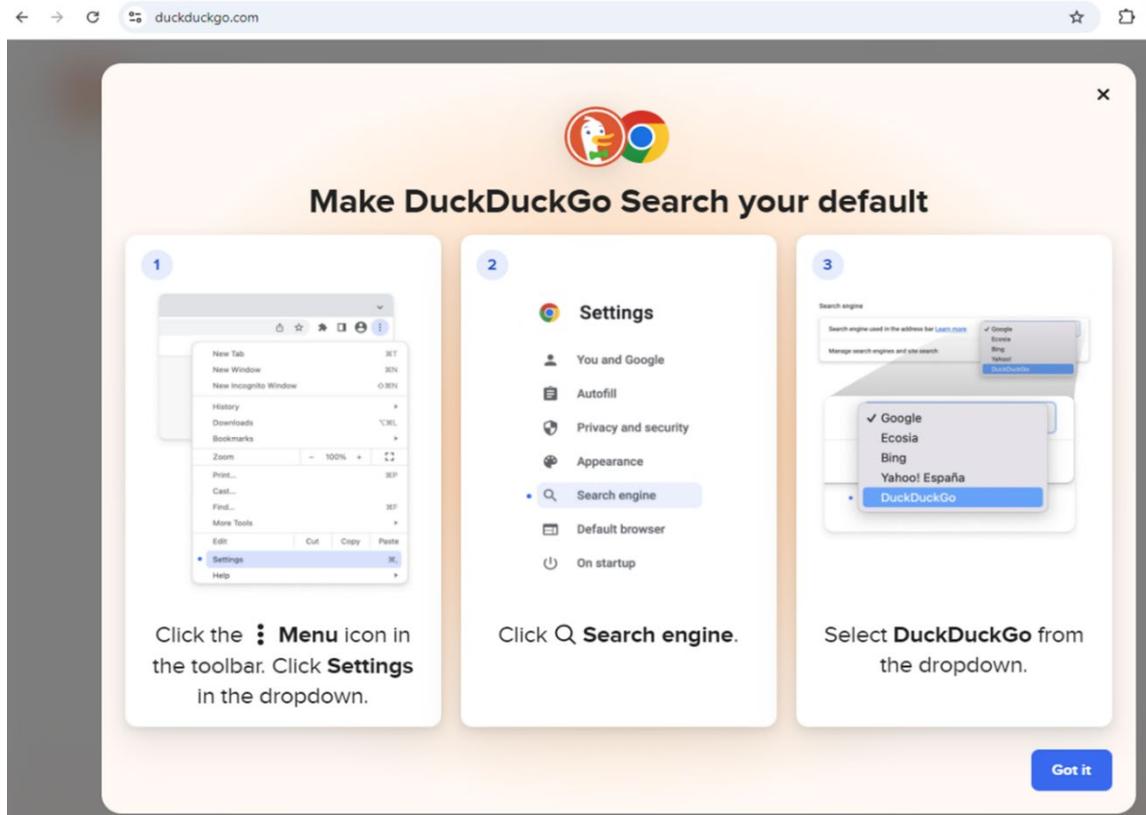


Fig. 3: we show this explainer to users who click "set as default search" on duckduckgo.com

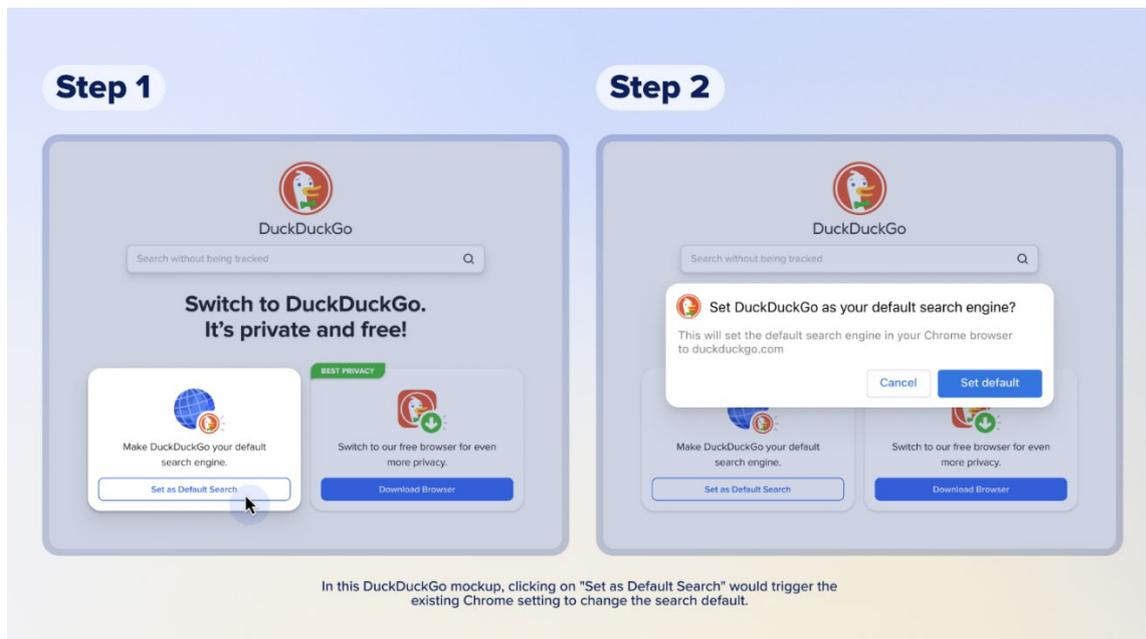


Fig.4: DuckDuckGo's « click-to-switch » mockup on Chrome.