

STRATEGIC MARKET STATUS INVESTIGATION INTO GOOGLE'S PROVISION OF GENERAL SEARCH AND SEARCH ADVERTISING

MOZILLA'S RESPONSE TO CMA's CONSULTATION ON USER CHOICE CONDUCT REQUIREMENTS

25 FEBRUARY 2026

Drawing on Mozilla's experience with the introduction of a browser choice screen in the EU and Japan and our extensive research into browser choice screen implementation, we have focused our Google Search conduct requirements submission on the User Choice Conduct Requirement (the "CR").

Importance of choice architecture design, user testing and a coordinated approach to choice screens

Mozilla commends the CMA's willingness to engage deeply with evidence on choice architecture and user behaviour, including through ongoing dialogue with stakeholders, to ensure that user-facing interventions can be effective in practice. We align with the CMA's aim to empower consumers to make active, informed choices about the search services they use and to switch quickly and easily – and hope the same attention will be given to browser choice as soon as possible. In general, we support remedies that strengthen choice and competition in search while avoiding unintended harm to browser and browser engine competition.

Mozilla agrees that *"The design and implementation of choice architecture can significantly impact Users' ability to make effective and informed choices"*.¹ And we strongly support the suggestions that, *"In seeking to design effective choice architecture, it may be desirable that design choices are tested with consumers before they are implemented"*.² Mozilla has [consistently advocated](#) for integrating user research into the development and evaluation of interventions involving user interface design, and believes this can greatly enhance their relevance and effectiveness. At the same time, testing should support timely rollout and iteration, and not be used to delay implementation of conduct requirements under the DMCCA.

There is, however, one crucial point missing from the CMA's approach to user choice: a coordinated approach to choice architecture remedies across both Search and Mobile Platforms. As explained further below, implementing the search engine choice screens alongside browser choice screens would ensure a coordinated approach, allowing for consistency in design, clarity in the user journey, and fewer consumer interruptions. Mozilla

¹ Consultation, §3.3.1

² Consultation, §3.3.2

therefore respectfully requests that the CMA launches a browser choice screen CR consultation as soon as possible, so that the search choice screen and browser choice screen can be launched at the same time.

General comments on the CR

In the consultation the CMA distinguishes between “system defaults” and “chosen defaults”.³ While this is understandable, it is in our view an oversimplification: the CMA’s definition of “system defaults” includes independent browsers such as Firefox. These browsers are not operating system providers or OEMs/MNOs and therefore do not have any control over the wider system. In general, “system defaults” should be understood as those controlled by the SMS firm and/or the OEM, MNO or operating system provider since these parties are in a position to set the defaults at the device level and to preference their own services. In the present case, the search engine default in Chrome might be considered a system default but the one in Firefox should not.

In addition to one-time choice screens, user agency can be supported through ongoing, user-initiated choice affordances that allow users to try alternative providers and, where desired, change defaults. As noted by participants of the CMA’s September 2025 choice architecture roundtable,⁴ Firefox’s “This Time Search With” feature is an example of a lightweight mechanism that lets users try a different search provider for a single search without immediately changing their default, supporting exploration and reducing the “all-or-nothing” nature of default switching.⁵ This complements the CR’s focus on keeping switching journeys accessible and discoverable, while remaining within the scope of Google-owned access points.

Mozilla supports the consumer benefits of effective choice remedies, including improving understanding of what is being set, reducing friction in switching, and enabling users to trial and explore alternatives without being locked into a single provider.

In that context, we support the CMA’s aims to improve users’ awareness of available search providers, engagement and confidence in their choice, and the ability to choose quickly and easily between providers on key Google-operated access points.⁶ We suggest making explicit in this “Aims” statement that effective awareness also requires understanding what a “Default Search Provider” is and how changing it affects the user’s settings and search experience, consistent with the CMA’s emphasis elsewhere on an understandable, information-led choice journey.

³ Consultation, §1.5(a)

⁴ <https://support.mozilla.org/en-US/kb/search-firefox-address-bar>

⁵

https://assets.publishing.service.gov.uk/media/68c29c52d65a1a2a5172a9ab/Summary_of_choice_architecture_roundtable.pdf

⁶ Consultation, §2.1

Question 6.1(a)(i) Coverage of the Search Choice screen

Devices

We agree with the CMA's goal of "*improving users' ability to exercise effective choice across more relevant Google-owned access points*"⁷ and with the CMA's approach for roll-out across devices.

For clarity, we would welcome confirmation of how the "pre-installed and/or set as default" threshold is intended to operate in practice across these access points. In particular, it is important to understand whether "set as default" refers only to defaults established through OEM/factory configuration (as on Android), or also to cases where a user has installed Chrome (for example on iOS/iPadOS) and Google Search is the in-app default unless the user changes it.

Access points

We agree with the CMA's proposal that "*third-party access points are not covered by the Search Choice Screen*". This is necessary to ensure a targeted intervention in Google's choice architecture on Google-owned access points, rather than a remedy aimed at third-party distribution arrangements which could have unintended consequences (for example, for the survival of independent browsers and for browser competition more generally).⁸

Question 6.1(a)(ii): Eligibility Criteria

Mozilla welcomes the CMA's recognition that some consumers lack awareness and understanding of search providers, including confusion between search and browser providers.⁹ At the same time, we would flag a potential risk in the eligibility criteria. The proposed framework includes a requirement that a service be "considered by a significant proportion of UK users" to provide a general search service.¹⁰ Where users lack awareness of search providers, this may unintentionally disadvantage legitimate, but newer or less well-known search providers.

If the CMA proceeds with a quantitative criterion that focuses on the level of user awareness/perception of a particular search engine, then 'a significant number of UK users', may be more appropriate than a 'significant proportion'. There are likely to be some search engines who might constitute less than 1% of total search engine usage in the UK, but still have a user base in the tens of thousands, which Mozilla would consider 'significant'.

Question 6.1(a)(iii): Eligibility Determination

⁷ Consultation, §4.10

⁸ Consultation, §4.14; <https://blog.mozilla.org/en/mozilla/internet-policy/google-remedies-browsers/>

⁹ Consultation, §4.42

¹⁰ Consultation, §4.22

Mozilla supports the CMA's suggestion that eligible providers should be assessed on a six monthly, rather than an annual, basis and agrees that an annual application window is likely to be too infrequent.

Mozilla supports a process for determining eligible providers that is transparent, consistently applied, and open to meaningful oversight. Mozilla's experience with choice-screen remedies shows that procedural details can materially affect outcomes. As such, we support a model where the CMA has clear oversight for the methodology and resulting list of choice screen participants, with clear documentation for additions/removals and a practical route for providers to raise concerns or seek review.

We welcome that the CMA is explicitly seeking views on how "popularity" should be determined. To avoid reinforcing incumbency advantages through distribution arrangements, we recommend that "popularity" be measured using user-driven indicators (for example, UK user downloads or active selection/usage), rather than pre-installation or "installs" that may reflect OEM or platform defaults, or a provider's ability to enter into distribution agreements rather than reflecting consumer preference and usage.¹¹

There are multiple ways for Eligible Providers to be ordered on a choice screen, including a fully randomised list or a two-strata approach (for example, a set of the most popular providers plus a broader set). The CMA's proposed two-strata model, combined with random ordering, is a reasonable starting point because it balances familiarity with breadth and recognises the strong effects of list position. However, if the two strata are displayed as two separate blocks, providers in the second stratum will systematically appear lower in the list and, as [Mozilla's Browser Choice Screen research](#) found, subject to strong position effects. For this reason, we recommend randomising the order across the entire combined list presented to users (while retaining the CMA's underlying approach to selecting a mix of popular and broader providers).

In Mozilla's browser choice screen research, we found that people want to see choice screens with more browser options, not fewer. Our experience in Japan under the Mobile Software Competition Act demonstrates how a short list based on a single popularity metric ("installs"), can exclude legitimate competitors for extended periods of time. The CMA's approach, combined with a clear "find and select any other Eligible Provider" pathway, better protects effective choice. (See our comments on "popularity" above).

6.1(a)(iv): Frequency

Mozilla supports the CMA's objective of presenting choices "at the right place, at the right time, with the right frequency," including the proposal that the Search Choice Screen be shown at least annually on Relevant Browsers and Relevant Devices.¹² However, resurfacing could create a risk of reversion bias towards the incumbent if users who have already selected a non-Google Default Search Provider are regularly prompted to choose again. We encourage the CMA to

¹¹ Consultation, §4.27

¹² Consultation, §4.33

consider limiting forced-choice resurfacing for users with an active non-Google default, while preserving user-initiated access to the Search Choice Screen at any time.¹³

We would welcome clarification on the intended design of resurfaced and user-initiated Search Choice Screens. In particular, it would be helpful for the CMA to clarify whether these experiences will be identical to the initial Search Choice Screen, or whether they will be framed differently, for example as “confirming” their current selection but with the option to make a new selection.

We would also welcome clarification on the messaging used for resurfaced prompts. There is a risk that users who choose a non-Google default may interpret a repeat prompt as a system suggestion that there is a specific reason they should re-evaluate their previous selection. Similarly, there could be a risk that users who choose a non-Google default may believe that selecting the system default (for example, Google) will stop prompts from appearing in the future. To avoid confusion and unintended nudges back to the incumbent, we encourage the CMA to consider requiring clear, accurate wording that explains why the prompt is being shown, that the user’s current selection remains legitimate, and that future prompting is not contingent on choosing a particular provider.

Question 6.1(a)(iv): Timing

Mozilla supports the CMA’s “Targeted” design principle, including presenting choices “at the right place, at the right time, with the right frequency.” However, to ensure the remedy is effective, choice screens should be shown at moments that do not favour the incumbent and when users are most likely to engage and consider alternatives.

For example, our research on browser choice screens shows that displaying a choice screen at browser first use almost doubles the selection of pre-installed defaults (and thus would tend to favour the incumbent) compared with device set-up.¹⁴ Thus, all else being equal, Mozilla would tend to support choice screens appearing at either (where relevant) device set-up or (applying the same logic) at major system updates.

For non-Android devices, in contexts where “first use” means opening Chrome for the first time, it would be preferable to implement the prompt within Chrome’s first-run onboarding flow, before goal-directed browsing begins. To limit the mistaken belief that using Google Search is a requirement of using Chrome, the onboarding text should make it clear that users can select any search provider.

Mozilla welcomes interpretative note 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 maximize their chances of being selected through the Search Choice Screen.”* In Mozilla’s view, sufficient

¹³ Consultation, §4.38

¹⁴ [Can browser choice screens be effective? | Mozilla Research](#), page 39

advanced notice should typically be notice of at least several months, to maximize the potential effectiveness of the choice screen. This should, of course, not be a reason to delay the implementation of the choice screen but the onus must be on the SMS firm to communicate plans in a transparent and timely manner.

Question 6.1(a)(v): Design

Information screens

Mozilla welcomes the CMA's recognition that some consumers lack awareness and understanding of search providers, including confusion between search and browser providers¹⁵, and we support the proposed requirement that the Search Choice Screen be immediately preceded by clear, accurate and balanced information to assist users in selecting a Default Search Provider.¹⁶

At the same time, we note a potential implementation risk: Mozilla's browser choice screen experiment found that, while beneficial, information screens tied to choice screens alone may not be sufficient to address these knowledge gaps.¹⁷ Where users' mental models around search providers remain imperfect, this can systematically advantage the incumbent, because uncertainty tends to push selection toward the most familiar option, which could reduce the CR's effectiveness.

We support the CMA's proposed use of user testing and behavioural audits as part of compliance monitoring, and we encourage ensuring that this evaluation explicitly includes whether the information screen improves user understanding of what a Default Search Provider is and what will change when a provider is selected.¹⁸

Key features

Mozilla supports the CMA's proposal for an information screen that provides clear, accurate and balanced information about what a search service is and how a user's choice will affect their settings and search experience. We would welcome clarification in respect of §3.3.15 which anticipates that the information screen will also explain "key features" of the Eligible Providers that may appear on the Search Choice Screen. In particular, it would be helpful for the CMA to clarify whether this is intended to be (i) provider-neutral information about how search services can differ in general, or (ii) provider-specific information about the Eligible Providers shown; and in either case, the CMA should confirm what role (if any) will Eligible Providers have in shaping or validating that information, beyond the provider-supplied short descriptions included on the Search Choice Screen itself.

Screen ordering

¹⁵ Consultation, §4.42

¹⁶ Consultation, §4.44

¹⁷ [Can browser choice screens be effective? | Mozilla Research](#), page 56

¹⁸ Consultation, §4.70

Where a Relevant Browser or Relevant Device is eligible to see multiple choice screens, the CMA proposes that Google may determine the order.¹⁹ To reduce priming and confusion, we encourage the CMA to set an expectation that, where browser choice screens and search choice screens are shown together, browser choice screens should come first, followed by search choice screens, with accompanying text clearly explaining that these are separate decisions and that using a particular browser does not require using any particular search provider. We would note that this is the model Google adopted for Android browser and search choice screens under Article 6(3) of the DMA. This addresses any concern that having the search engine choice screen appear first could nudge users towards selecting Chrome as the default browser. Mozilla would also suggest interpretative note 4 is amended accordingly along the following lines:

“At set-up or at the point of system-level update, in circumstances where a Relevant Browser or Relevant Device (whether subject to a separate conduct requirement or otherwise) is also displaying another type of choice screen, the order in which Google will display the choice screens will reflect the approach as agreed with the CMA from time to time.”

Question 6.1(a)(vi): Test Drive

Mozilla supports the CMA’s proposal to include a “test-drive” option, given the CMA’s view that search is an “experience good” and that trials can help users evaluate less familiar providers.²⁰

We also support the CMA’s proposed approach that, at the end of a test-drive, users should be prompted to either confirm the tested provider, switch to another eligible provider, or test-drive again.²¹ Given that test-drive requires a follow-up prompt at the end of the trial, clarity in the end-of-trial messaging will be important, and we welcome the CMA’s proposed use of user research to assess these user journeys in practice.²²

Question 6.1(a)(vii): Android Device-Level Journey

Journey

Mozilla supports the CMA’s proposal to retain existing user journeys for changing default search settings across access points, while adding a single, device-level default search setting on Android to reduce switching friction, and we agree that this remedy should focus on Google-owned access points rather than reaching into third-party apps or browsers.²³ We also support the CMA’s emphasis on discoverability, including enabling effective device-settings search terms such as “default” and “default search.”

¹⁹ Consultation, §3.3.4

²⁰ Consultation, §4.45

²¹ Consultation, §4.48

²² Consultation, §4.70

²³ Consultation, §4.53

At the same time, a “device-level” default search setting that applies only to certain Google access points on Android (i.e. Chrome and the Search widget) risks being interpreted as a system-wide default. To avoid confusing users and to preserve the CR’s focus on Google-owned access points (without affecting third-party browsers), any Android device-level setting should be explicitly scoped and labelled to the specific Google access points it governs, for example through a dedicated “Google access points” hub or an OS-level control that clearly states it applies only to Chrome and the Search widget.

Retriggering the Search Choice Screen

We support the requirement that users be able to retrigger the Search Choice Screen at any time from settings.²⁴ In implementing the Android device-level default search setting alongside this retrigger option, we encourage a streamlined settings experience that clearly distinguishes (or sensibly integrates) the direct default-setting control and the “retrigger choice screen” pathway, so users understand when they are changing a setting directly versus returning to the choice flow.

Testing

We encourage the CMA to treat “easily”²⁵ as a measurable usability outcome in compliance monitoring (for example, whether users can find, understand, and complete the change without errors), not solely as the existence of a settings path.

Question 6.1(a)(viii): Third-Party API Access

Mozilla supports the CMA’s proposal to require a search default setting API that allows Eligible Providers to determine whether they are currently set as a user’s Default Search Provider on Relevant Browsers and Relevant Devices.²⁶ As the CMA notes, this would mirror Google’s existing Browser Default Settings API and help address the information asymmetry that currently leaves only Google with reliable access point visibility.

More generally, where remedy oversight depends on data access, our DMA experience suggests that when remedy data is only available through periodic, delayed reporting, it can put alternative providers at a disadvantage in practice. [Google’s public DMA choice-screen documentation](#) indicates that selection reporting is provided on a quarterly basis. In Mozilla’s experience, the current process (certainly for browser choice screens and presumably also for search choice screens) involves receiving a delayed spreadsheet via email at the end of each quarter, which makes the data difficult to integrate into workflows, limits its usefulness for timely analysis, and hampers Mozilla’s ability to monitor and respond to user behaviour effectively.

²⁴ Consultation, §4.38

²⁵ [“Easy” Default Browser Settings Aren’t Always Easy - Mozilla Research](#)

²⁶ Consultation, §4.60

We therefore encourage the CMA to ensure that any reporting and monitoring arrangements associated with the UK remedy are timely and usable in practice, including through API-based access where appropriate.

Question 6.1(a)(ix): Google Prompts

Mozilla supports the CMA's approach to "balanced" prompts, though we would welcome clarification on how the CMA intends to assess this. Users may benefit from being notified when default search settings change, but any such notification should be neutral and should not ask users whether they want to switch to Google Search (or any other Google Search product).²⁷ We agree that this safeguard should apply not only to wording, but also to how prompts are triggered in practice.

In particular, prompts related to default-search changes should be applied consistently regardless of whether the user's current default is Google or a non-Google provider, and should not be deployed more frequently than necessary or at more disruptive moments. Nor should prompts to switch default search engines be shown to a user when using other Google products, such as Google Maps or Gmail. Indeed, the only scenarios that Mozilla envisages such a prompt to be appropriate are those similar to those listed at §4.65, i.e. situations in which users may not be aware that clicking on a link or using a search extension is changing their default search engine.

Question 6.2(a),(b): Monitoring and Compliance

Mozilla supports compliance reporting every six months and we agree that correspondence relating to the rejection of applications for eligible providers should be shared with the CMA. A non-confidential summary of the compliance reporting should be swiftly published following submission to the CMA.

We also support the CMA's proposal to use behavioural audits to explore the user journey and identify any choice architecture issues that may arise.²⁸ This will be an important route to test both the compliance with and effectiveness of interventions. Mozilla also supports the CMA's expectation that the CMA should be notified in advance of any rollout of changes to choice screens or related choice architecture, including sharing any user testing plans and findings.

In line with Mozilla's experience evaluating choice interventions, we support integrating user research into both the design and evaluation of these measures, and recommend that the obligation to share research plans and findings should apply not only to subsequent changes, but also to initial design proposals prior to first rollout.

6.3 Proportionality

²⁷ Consultation, §4.65

²⁸ Consultation, §4.70

Mozilla broadly agrees with the CMA's proportionality assessment proposal.²⁹ In particular, we agree that the intervention should be targeted at SMS firm-owned access points and is designed around principles intended to support effective, informed user choice while limiting unnecessary friction, including through clear information, appropriate timing and frequency, and monitoring through reporting, user testing and behavioural audits.

Importance of coordination of search choice screens with browser choice screens

Mozilla welcomes the introduction of a search engine choice screen, as experience has shown that choice screens are among the most effective measures to promote competition in digital markets.

However, an approach to digital markets regulation which puts in place a search engine choice screen without at the same time putting in place a browser choice screen is a disjointed approach, which compromises the effectiveness of both of these choice screens.

Consulting on a browser choice screen in parallel to a search engine choice screen is the logical approach for:

1. **Efficiency:** in terms of CMA and SMS firm resources, there are natural efficiencies to be realised from looking at the similar issues which both choice screens raise, and carrying out user testing, at the same time. While search engine choice screens may have 'had a headstart' insofar as this consultation has already been run, this is more than negated by the fact that, in the case of browser choice screens, the CMA can draw on the significant volume of work it did on choice screen design in the context of the Mobile Browsers and Cloud Gaming Market Investigation ("**MBMI**").
2. **Effectiveness:** the effectiveness of the relevant choice screen measures, quantified in terms of user engagement and number of switches of default product, is likely to be greatest where there is alignment between the timing of the launch of the two choice screens. At the very least, it will avoid unnecessary user confusion. As outlined above, a browser choice screen launched at the same time as a search choice screen (appearing directly before the search engine choice screen in the user journey), was considered by the European Commission the most effective approach when implementing choice screens under the DMA.

While we appreciate that there may be some separation of functions between the CMA team focusing on Search and the Mobile Platforms CMA team, it is important that the two teams do not operate in isolation, particularly when it comes to considering products as closely related as browsers and search engines. There are significant efficiencies which could be realised from cooperation between the Search and Mobile Platforms teams on choice screen design.

²⁹ Consultation, §5.1

As noted above, implementing browser choice screens and search engine choice screens to UK users at the same time reduces the risk of user confusion between browsers and search engines, something which research suggests can be an issue with many users.³⁰

The MBMI process, and the fact that both browser choice screens and search engine choice screens have been in place for some time in the EU, means market participants are well placed to begin providing input now in response to a consultation on a browser choice screen conduct requirement.

Putting a browser choice screen in place during the course of 2026 would ensure that the DMCCA is delivering choice and competition for UK consumers and contributing to the CMA's wider goals – particularly given that browser choice screens have a clear track record of resulting in significant user switching. Firefox experienced a c. 100% increase in daily active users on iOS in the EU within a year following the implementation of the DMA browser choice screen. Opera reported a 164% increase in its EU user base on iOS; Aloha reported a 250% increase.

The CMA should not miss this opportunity to build on the work already done by the CMA Google Search SMSI team and during the MBMI to deliver the most effective set of choice screens possible. Mozilla accordingly respectfully requests the CMA to begin consultation on browser choice screens as soon as possible, with a view to browser choice screens being launched at the same time as search engine choice screens.

³⁰ [Can browser choice screens be effective?](#)