

Platform Leaders' Response to the CMA's Consultation on Conduct Requirements for Google's General Search Services

February 2026

Introduction

Platform Leaders welcomes the opportunity to respond to the CMA's consultation on proposed Conduct Requirements for Google's general search services. This submission builds upon our January 2025 response to the Invitation to Comment and our July 2025 response to the Proposed SMS Decision, and has benefited from the input and research of the Collective Intelligence for AI initiative.¹

Platform Leaders brings together stakeholders including start up and scale up entrepreneurs, practitioners, policy makers, researchers and investors contributing to digital platform development. We believe digital markets should be **open, competitive, and conducive to innovation**.

We **support the proposed Category 1 Conduct Requirements** as a proportionate initial set of interventions. Consistent with our previous submissions, we emphasise that these interventions should be designed for the AI era, with sufficient flexibility to adapt as competitive dynamics evolve.

This response addresses the specific consultation questions posed in each of the four CR documents. We focus our detailed responses on areas where our community has direct expertise and experience.

We value the CMA's participative approach to this consultation process. The evidence-led, forward-looking dialogue between the regulator, the designated firm, and wider stakeholders is a distinctive strength of the DMCC Act regime. Platform Leaders' continued engagement in this process reflects our commitment to this constructive model of regulatory development.

1. User Choice Conduct Requirement

Question 6.1: Do you agree with the key design options we have considered in terms of effectiveness for the User Choice CR?

Platform Leaders **supports** the User Choice CR as an appropriate initial intervention and broadly agrees with the CMA's key design options. We offer the following observations:

Coverage, eligibility and provider determination (Q6.1(a)(i)–(iii)): We support coverage across Android devices and Chrome. On eligibility, we agree with the criteria proposed as a starting point but stress the importance of ensuring that these criteria will be able to accommodate the evolving nature of search. Research from Collective Intelligence for AI indicates search is fragmenting across multiple modalities, from traditional search engines, standalone AI assistants, voice assistants, and visual search, to social discovery, with voice and visual search now accounting for over 20% of all queries. New AI entrant ChatGPT reported 900 million weekly active users in November 2025 (up 3x from December 2024).² While many AI assistants are not primarily marketed as search engines, we believe behaviours are clearly changing fast and the eligibility criteria considered will need to capture emerging AI-powered search experiences. The CMA's role in overseeing the determination process is appropriate given the risk that a designated firm could apply criteria too restrictively.

We note that the application of User Choice requirements to Android devices may require further clarification. In practice, many Android devices are shipped with manufacturer-specific customisations (e.g. Samsung, Xiaomi) where Google does not directly control choice screens, default search arrangements, default browsers, or associated commercial agreements. The CR should clarify how obligations apply where the OEM, rather than Google, controls key elements of the user experience.

Frequency, timing and choice architecture (Q6.1(a)(iv)–(v)): We support annual resurfacing of the Search Choice Screen. While we recognise that search engines and AI assistants remain functionally distinct products that serve different purposes today (as stated in the CMA's designation) we believe choice architecture principles should also be designed with AI transformation in mind. Any future expansion of the choice screen to include AI assistants should be informed by evidence that consumers can meaningfully compare these categories and that such inclusion assists rather than confuses decision-making. Also, choice mechanisms focused solely on browser-based search will need to evolve as user behaviours change.

Test-drive function (Q6.1(a)(vi)): We welcome this concept as a thoughtful proposal that merits careful design. By reducing the perceived risk of committing to an unfamiliar service, the test drive option may meaningfully increase genuine user engagement with alternatives. We assume that the test drive period would be followed by an opt-in screen (rather than automatic continuation or discontinuation). We note, however, that the full sequence of “choice moments”, from choice screen to test drive to opt-in re-prompting, should be validated through user experience testing to ensure they genuinely enhance decision-making rather than creating friction or confusion. The CMA should consider piloting these mechanisms before finalising the design.

Device-level consumer journey and third-party API (Q6.1(a)(vii)–(viii)): We support the device-level default setting providing a single point of control for switching. The Search Settings API for third-party access is a sensible measure to enable a competitive ecosystem, particularly as some AI assistants may wish to use/respect user preferences. We trust privacy safeguards (read only mode, etc.) can be designed around this proposal.

Prompts (Q6.1(a)(ix)): We agree that prompts should be fair and balanced and should not inhibit effective user choice, particularly during the period immediately after a user switches, when reversion prompts could undermine the choice architecture.

Question 6.2: Do you agree with our proposals for compliance reporting and monitoring?

We strongly support robust compliance monitoring. In addition to the metrics proposed, we recommend the CMA also consider monitoring:

- Actual switching behaviour over time (not just initial selections) to assess whether choices are sustained.
- User understanding of options, through periodic qualitative research.

The CMA could consider the provision of data considered sensitive (switching, etc.) under NDA while aggregated figures are made public.

We note that traditional market share metrics may fail to capture emerging competition in AI-mediated search, since assistants will increasingly compete across a range of features including conversational ability, reasoning capability, and integration rather than conventional search metrics alone.

We agree with six-monthly compliance reports and provision of rejection correspondence to the CMA.

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

We agree. The User Choice CR is an appropriate, proportionate Category 1 measure focused on transparency and choice, consistent with the CMA’s graduated approach. It retains the ability to escalate if market-led AI competition fails to materialise, and to de-escalate if it proves effective. The benefits of increased competition and consumer choice are likely to be significant, particularly given the £10 billion+ spent annually by UK businesses on Google search advertising.³

Question 6.4: What are the likely costs for OEMs?

Platform Leaders does not have specific data on OEM implementation costs. We note that OEMs have experience implementing similar choice screens under the EU DMA, which should reduce incremental costs. We understand the CMA is engaging directly with OEMs on these topics to ensure costs do not inadvertently reduce device diversity or consumer choice.

2. Fair Ranking Conduct Requirement

Question 6.2: Do you agree with the proposed scope of the Fair Ranking CR?

Platform Leaders **supports** the Fair Ranking CR as addressing legitimate concerns raised by businesses that depend on search visibility. We agree with the proposed scope covering organic search results, results within search generative AI features (AI Overviews, AI Mode), and the relative ranking of organic results and search features on the SERP. We believe the inclusion of AI-generated features within scope is particularly important given their growing impact on organic traffic. However, we recognise that AI generated responses are not subject to the same “pure” ranking principles since they are driven by algorithmic synthesis. In that context, specific additional guidance on ranking in AI outputs may be required. For example it may be useful to distinguish between (a) the selection and weighting of sources feeding AI outputs, and (b) the presentation logic

of conventional ranked results, recognising that different transparency mechanisms may be appropriate for each. We also agree that paid-for results are appropriately excluded.

Question 6.3: Do you have any views or evidence on the benefits or costs?

From our community’s perspective, for businesses relying heavily on organic search visibility, the benefits of fair, transparent, and non-discriminatory ranking are significant. Businesses investing in quality content need confidence that visibility is determined by objective criteria. The absence of such confidence inhibits investment and innovation. We note the CMA’s assessment that compliance costs should be relatively modest, primarily involving formalisation of existing internal policies.

Question 6.4: Do you have any views on the non-discrimination part?

We consider the proposed non-discrimination requirements appropriately comprehensive. The prohibition on Google considering whether a publisher advertises, has commercial arrangements, has opted out of AI features, or has exercised statutory rights addresses the key risks. The requirement to apply the same criteria to Google’s own products and third-party equivalents is essential.

We also note that the non-discrimination framework should be designed so as not to create any chilling effect on stakeholder engagement with regulatory processes.

Question 6.5: Do you have views on the transparency part?

As we highlighted in our January 2025 submission, many businesses would benefit from advance awareness of major algorithm changes. We welcome these transparency requirements, particularly as AI-driven search evolution may create more frequent algorithmic shifts.

On ‘material change’, we agree with the CMA’s proposed interpretation and suggest it should also cover the introduction of new AI-generated search features or significant changes to how AI Overviews or AI Mode source and present content. We agree that disclosing outcomes and objectives rather than detailed proxy signals strikes an appropriate balance between transparency and gaming prevention. We note that since many systems are subject to continuous improvements, and some businesses may not have the bandwidth to react to every material change, a yearly overall guidance focused on direction of travel, overall objectives and desirable outcomes, as suggested by Google itself in 5.10(b), would be a practical complement to event-driven notifications.

Broader stakeholder communication: Communication around search changes should not be solely focused on advertisers. Transparency should extend to businesses relying primarily on organic visibility, who are often most affected by ranking changes but least informed. We note that Google may be able to expand its existing Search Central communications to explicitly include businesses focused on organic traffic.

Question 6.6: Do you have views on the non-distortion and complaints part?

We support the complaints-led approach as practical and proportionate. However, we **reiterate our previous recommendation for an emergency process** when urgent intervention is required, for example, where a significant ranking change is materially impacting a business’s ability to operate. Businesses facing such situations need a faster escalation route with clear timelines. Impact thresholds could be designed to avoid accusations of frivolous escalations while allowing genuine emergencies to be addressed.

On materiality threshold factors, we agree complaint volume is relevant but should not be the sole metric. Factors should also include: severity of impact on individual businesses (a single business losing most organic traffic may warrant attention); breadth of impact across a market sector; and whether impact disproportionately affects smaller businesses.

Question 6.7: Do you have views on a general complaints process for manual exclusions?

We support the introduction of an alternative dispute settlement mechanism for manual exclusions. The impact of being excluded from Google’s search index can be existential for a business, and there is currently no effective external recourse. The mechanism should be accessible, timely, and transparent and ensure procedural fairness from Google.

3. Data Portability Conduct Requirement

Question 6.1(a): Do you agree with the aim and implementation approach?

Platform Leaders **supports** the Data Portability CR. Its primary value is establishing **legal certainty**. While we note that the API is already available in the UK, establishing data portability on a formal legal footing would provide additional certainty and confidence for third-party developers considering long-term investment. Formalisation would complement existing provisions without requiring significant new technical development, given the API already operates in the EEA (and voluntarily in the UK).

Question 6.1(b): Would the CR result in the potential benefits identified?

Yes. The comparison with Open Banking, where formal requirements catalysed an ecosystem estimated at over £4 billion to the UK economy, is instructive.⁴ Data portability in search could similarly enable new services, particularly for AI-powered applications that can make meaningful use of users' search history with their consent. Third parties with greater confidence in data availability are more likely to invest in innovative products, benefiting all consumers. We however recognise that search behavioural data differs in nature from financial transaction records, and that any portability framework must address both the privacy implications of transferring search history and the practical challenges of data standardisation.

Overall we believe that this added incentive to build innovative applications on top of Google's data layer has the potential to generate significant benefits for the ecosystem.

Question 6.1(c): Do you agree with the use of Interpretative Notes?

We agree. Interpretative Notes provide clarity and certainty while preserving flexibility for the CMA to adapt expectations over time, consistent with the principles-based approach we have valued in previous submissions.

Question 6.1(d): Do you agree with the content of the Interpretative Notes?

We consider the Interpretative Notes generally clear and comprehensive. The expectations on uptime, successful transfers, data accuracy, balanced consent flows, and verification requirements address the key operational concerns. Consent processes should not be designed to discourage porting. Equally, some users may wish to ensure that no third party has access to their search history. The framework should provide clear reassurance that data portability is only triggered following informed, affirmative consent by the user, and that users who prefer to keep their data with Google alone are not disadvantaged.

We welcome the pragmatic approach of allowing Google to comply by extending DMA API availability to UK users on the same terms as EEA users. This reduces complexity and costs while delivering equivalent benefits, consistent with our emphasis on international coordination. The provision that data scope need not exceed DMA obligations is sensible, avoiding UK-specific divergence without clear additional benefit.

Question 6.1(e): Do you agree with proposals for compliance reporting and monitoring?

We agree. The metrics identified, successful request rate, 24-hour export completion, file export success, API uptime, and user initiation counts, are well-chosen. We support publication of non-confidential compliance reports to improve transparency. Annual reporting appears proportionate given existing DMA obligations.

4. Publisher choice, transparency and attribution conduct requirement

Platform Leaders' observations

Platform Leaders' community engages with publisher content primarily from the demand side, as businesses seeking digital visibility, discoverability, and customer acquisition through platforms. We approach this CR from the perspective of organisations that depend on content being surfaced fairly, rather than as content publishers themselves. This complementary vantage point informs the observations below.

The Collective Intelligence for AI research discusses approaches to "protected discovery", technical mechanisms allowing organisations to balance visibility with content protection, which work well for many businesses seeking to be found by AI systems while managing content use. We note that a number of organisations are

reporting lower traffic from Google since the introduction of AI Overview and AI Mode, though this is sometimes partially offset by traffic from new entrants such as ChatGPT, with some anecdotal evidence of higher-quality engagement from AI search traffic. Understanding and managing these effects is a growing priority for businesses in our community. Transparent measurement of how AI search features affect referral patterns across different business types would help stakeholders understand and adapt to this new reality.

We recognise that content monetisation concerns raise distinct issues for publishers, and that current opt-out mechanisms may not yet provide the clarity or granularity these stakeholders need.

The following observations are particularly relevant from a platform ecosystem perspective:

First, we support transparency and choice as general principles. Publishers should have meaningful control over content use and sufficient information to make informed decisions. We draw a distinction here between transparency about how the proposed publisher controls operate, which is essential and within the scope of this CR, and broader questions about the extent to which AI developers should disclose how their products work and use data more generally, which is a broader issue already being addressed through the government’s ongoing work on AI transparency and the evolving copyright framework.

Second, we recognise the complexity of this area intersecting with broader copyright and AI policy considerations beyond the CMA’s scope. Ongoing legal challenges and content licensing negotiations across jurisdictions may lead to partial resolutions with a bearing on regulatory remedies that may be proposed. The CMA’s approach of focusing on transparency, choice, and attribution as Category 1 measures, while reserving fair and reasonable payment terms for Category 2, appears a prudent sequencing.

Third, proportionality in implementation is important. The CMA will want to ensure that any grounding control requirements remain strictly proportionate, balancing content protection with the wider benefits of discoverability that sustain the digital economy. If these obligations are not carefully calibrated, there is a risk that various publisher-side restrictions could degrade the quality and richness of AI-generated responses, creating barriers to the discovery mechanisms on which many businesses in our community depend. The CMA’s framework should ensure that publisher controls serve their intended purpose of meaningful choice and fair attribution without fragmenting the information ecosystem in ways that ultimately harm consumers.

5. Cross-cutting themes

Consistent with our January 2025 and July 2025 submissions, we emphasise the following themes across all four proposed CRs:

AI-era design. The search industry is at an inflection point. AI is increasingly disintermediating established search engines and new AI assistants operate outside traditional advertising models. As Collective Intelligence for AI documents, over 35% of Americans now use generative AI tools, with 44% of AI users considering it their primary search tool.⁵ The AI assistant market is more distributed than traditional search, with ChatGPT holding approximately 79% of AI search traffic compared to Google’s 90% share of traditional search.⁶ Traditional search advertising, a \$200+ billion industry, faces fundamental disruption as AI provides direct answers. However, monetisation strategies are now diverging: in February 2026, OpenAI began serving ads to ChatGPT users in the United States,⁷ while others such as Anthropic have explicitly positioned themselves as ad-free.⁸ AI agents will further disrupt search, discoverability and commerce. Remedies must be designed for this fast-evolving landscape.

Built-in adaptability. Given unprecedented uncertainty around AI market evolution, review mechanisms should be tied to AI development milestones, with the ability to modify interventions rapidly if competitive conditions change substantially. This is compatible with the CMA’s phased approach and the statutory requirement to keep CRs under review.

Graduated approach. We support the CMA’s graduated approach: beginning with less intrusive Category 1 measures (transparency, choice, data portability) while retaining the ability to escalate if market-led AI competition fails to materialise, and to de-escalate if it proves effective.

Continuous monitoring. AI-specific indicators will become increasingly important across all four CRs, including availability of alternative AI search experiences, barriers to AI assistant development, and data access for AI operation. Regulators need to create conditions for the emergence of sustainable AI products and services, requiring a forward-looking view of competition. We believe that significant competitive changes, including the

likely emergence of agent-mediated commerce and AI-native business models, will materialise within the next five years.

Evaluation methodology. While we support the CMA’s approach and CRs we note that the consultation documents are relatively light on how the effectiveness of interventions will be evaluated. There is an inherent risk that regulation may address the wrong dimension or bottleneck in the marketplace. We would welcome greater clarity on how the CMA intends to assess whether the limiting factor in any given market is the direction or design of the intervention, or its scale, and how evaluation methodology will be adapted as AI transforms the competitive landscape.

Level up, don’t degrade. Regulation should level up the competitive process rather than degrade existing services. Barriers to entry are fundamentally different in AI search, building a traditional search engine requires billions, while deploying AI search experiences has become dramatically more accessible. Regulation should support this shift rather than inadvertently reinforcing legacy market structures.

Conclusion

Platform Leaders supports the CMA’s proposed Category 1 Conduct Requirements as a proportionate initial set of interventions. We commend the CMA’s evidence-based approach and recognition that measures should be effective without being more onerous than necessary.

We emphasise that interventions should be designed for the AI era. The UK has the opportunity to lead globally by creating a regulatory framework that protects competition while enabling the innovations that will define the next decade of digital markets. The regime’s own design choices, the 4Ps framework, the participative dialogue between regulator and stakeholders, and innovative remedies such as the proposed test-drive function, represent regulatory innovation in their own right and deserve to be recognised as such.

We also recognise that Google is itself investing heavily in AI-powered search experiences, and that the regulatory framework should support this innovation while ensuring it does not entrench existing market positions.

Platform Leaders looks forward to continuing to contribute to this important work.

On behalf of Platform Leaders

References

¹ See in particular the [Collective Intelligence for AI](#) white paper Search in an AI World: Navigating the Transformation of Digital Discovery (November 2025) and companion implementation guide Generative Search Optimisation (GSO) – A Practical Implementation Guide (November 2025).

² [‘ChatGPT Nears 900 Million Weekly Active Users’](#); Sherwood News, 9 December 2025. Up from 300 million in December 2024 per OpenAI.

³ CMA, [‘Improving the way Google delivers search services in the UK’](#), CMA Blog, 28 January 2026: “over 200,000 UK firms spent more than £10 billion on Google search advertising last year”.

⁴ [Open Banking Limited, Impact Report \(2025\)](#): open banking ecosystem worth £4.1 billion to the UK economy with 16.5 million user connections as of December 2025.

⁵ Collective Intelligence for AI, [Search in an AI World](#) (November 2025), citing Brookings Institution survey data and industry usage statistics.

⁶ SE Ranking, [‘AI Traffic in 2025’](#): ChatGPT held 77.97% of AI referral traffic; Statcounter [AI Chatbot Market Share data](#) (June 2025): ChatGPT at 79.76%.

⁷ OpenAI, [‘Testing ads in ChatGPT’](#), 9 February 2026; Axios, [‘OpenAI brings ads to ChatGPT Go and Free tiers’](#), 9 February 2026

⁸ Anthropic, [‘Ads are coming to AI. But not to Claude.’](#) Super Bowl LX campaign, 4 February 2026; CNBC, 4 February 2026.