



Vivaldi Technologies AS, Mølleparken 6, Oslo, Norway, 25 February 2026.

Response to consultation: Google's general search services – User Choice Conduct Requirement

We are providing brief feedback, because Vivaldi is a web browser, not a search provider (and has no plans to move into that market).

We are, however, pleased to see CMA's proposed improvement to the more general requirements for choice architecture, and hope that they will soon be proposed for the **browser** choice mechanisms required of both Google and Apple, and ultimately for Microsoft on Windows devices.

Greater coverage, Increased frequency and timing, 'Test-drive' option

Vivaldi supports these requirements, given the number of old devices in circulation, and initial user hesitation when switching from defaults can be reduced with the test-drive option.

Better design of choice architecture

Vivaldi supports this requirement. SMSs should document and make available the user testing they perform to ensure neutrality of prompts and ease of choice, and show third party research they have commissioned to satisfy CMA that "scare language" and steering is eliminated.

Wider Eligibility

Vivaldi wholeheartedly supports this requirement. People who switch away from Google products often do so because they are worried about the privacy implications of using Google services, and are consequently more likely to install from vendor's own sites, or alternative app stores to Google Play. Therefore, restricting the candidates for the choice screen solely to the most-downloaded from Google Play is skewing the choice screen.

We share CMA's concern that restricting the candidates for the choice screen to those that are already the most popular means that new entrants to the market (or smaller, niche-focussed players) are excluded and thus their growth could be further impaired, leading to a self-perpetuating dominance of the big players.

Therefore, a mix of the most popular, and a random selection from all eligible providers, gives "air time" to market participants who do not have the marketing budget and brand recognition enjoyed by the major players (many of whom have achieved such recognition and budgets because of historically skewed markets).

There is a danger that the large corporations can still dominate the choice screens by appearing in the search choice, and the browser choice and any potential future AI Agent choice screen. Therefore we suggest that large entities that would ordinarily be a candidate for multiple choice screens simply because of the size of existing userbase (eg, it's one of the most-downloaded from Play store) should choose whether its products appear in the search choice **or** the browser choice, **but not both**.