

## Question 6.1(a)

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

We understand and fully support the aim set out in paragraph 2.1. As one of the OEMs, we place the highest priority on usability in order to deliver products that users choose, and we believe that this aim itself contributes positively to enhancing usability. However, we are concerned that increasing the number of mandatory Choice Screen displays may confuse, inconvenience or frustrate users and, as a result, undermine usability. Instead, we believe that efforts should focus on enabling users who wish to make changes to be able to easily adjust their settings at the time and frequency of their choosing. In addition, if we are to require users to make a choice, we believe it is important to provide a clear and concise explanation so that users can understand why they have to do so at that particular point in time.

### (i) Coverage of the Search Choice Screen

We have no objection to expanding the scope of display to include Google Pixel devices, the Chrome app on iOS/iPadOS mobile devices, and the Chrome browser on desktop devices, as stated in paragraph 4.11. We also believe that displaying the Choice Screen in a similar manner on Google Pixel devices and iOS/iPadOS mobile devices would help avoid user misunderstandings described at the end of the first paragraph of our response to Question 6.1(a)(iv) arising only with respect to Android devices.

With respect to expansion of access points on Android devices, we have no objection to the approach described in paragraph 4.20 of limiting them to the Search widget and the Chrome app, as we believe this would not unduly impair usability.

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

We agree with the idea of establishing certain eligibility criteria for providers displayed on the Search Choice Screen. However, in order to avoid user confusion or

inconvenience, we believe it is important, when designing such criteria, to (A) avoid increasing the number of options presented on a mandatory basis to an excessive level, and (B) ensure the quality of Eligible Providers so that the experience users generally expect from a search service is not impaired.

(iii) Determination of the list of eligible providers and the role of the CMA

We consider transparency and predictability to be important in the selection of Eligible Providers; however, this is primarily an issue between search service providers and the regulatory authority, and as an OEM, we do not have specific views on the detailed operational arrangements.

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

As we noted at the outset, we believe that requiring users to be provided with a non-skippable Search Choice Screen on an annual basis is overly frequent, and that this frequency should be carefully reconsidered from a usability perspective. Requiring users to make choices too frequently may not only cause frustration, but also create the risk of users mistakenly believing that their settings have been changed without their intent, that the services that they have used are no longer available or are otherwise no longer functioning as expected, or that their previous selections have been voided due to faulty software.

As noted in paragraph 1.7, the majority of users continue to select Google Search even when presented with a Choice Screen. We wonder if this is simply because many users have limited interest in actively choosing a search service, or that they are already satisfied with Google Search, or even that users who are not satisfied with Google Search have already changed search service providers without the aid of a mandatory Choice Screen. Therefore we believe it would be beneficial for the CMA to conduct a thorough assessment to better understand the actual situation. Requiring such users to go through the Choice Screen process repeatedly would not only impair usability and become burdensome to users, but could potentially lead to outcomes contrary to the CMA's intentions, as noted by CMA at the end of paragraph 3.3 1.a..

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

We fully agree with the statements set out in paragraph 3.3(1) (Choice Design Principles). In addition, we believe that, in designing the choice architecture, it is essential that users are able to clearly and neutrally understand which search engine they are currently using, as well as the scope of any impact that would result from switching to an alternative provider.

(vi) Option to 'test-drive' search providers

We believe that a test-drive functionality, if appropriately designed, could be helpful in enabling users to understand different search services. However, in order to avoid confusion, it is important that users are provided with clear and sufficient information regarding the device behavior and settings following the end of any trial period.

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

If the design is handled by Google and the OEM is only required to implement it on the smartphone devices, we have no particular objection.

As we understand this to expand user choice, we have no particular objection provided that the implementation is mainly handled by Google.

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

While we understand the objective of ensuring fairness, we believe that priority should be given to clarity for users and to the protection of user privacy.

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

We have no objection to the content of paragraph 3.3 24(Prompts). We believe that prompts related to search settings should be neutral and explanatory in nature, and should not steer users toward any particular option.

-----

Question 6.2

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

As an OEM, we do not have any specific comments on the proposals set out in this question, as we understand these proposals concern matters between search service providers and the regulatory authority.

---

Question 6.3

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

We have no objection to the overall framework; however, where our understanding differs, our views are as set out in the respective responses above. In particular, we consider the requirement to display the Choice Screen on an annual basis to be excessive. In assessing proportionality, due consideration should be given not only to economic costs, but also to potential impacts on user experience and cognitive load. We believe that, rather than forcing users to make a choice, it is more important and effective to provide a clear and concise explanation that enables users to understand the potential benefits of making such a choice at a time and frequency of their choosing.

---

Question 6.4

What are the likely costs for OEMs arising from each of the design elements?

We understand that the proposed measures would, in principle, be implemented by Google, and that any additional implementation or verification efforts required on the OEM side would be limited overall.