



3 March 2026

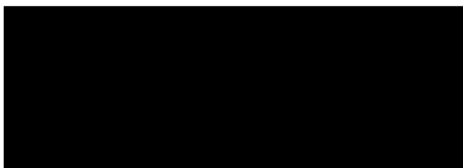
**Object: Response to Proposed Commitments by Google and Apple.**

Dear Sir/Madam,

Please find enclosed a submission from the Consumer Choice Center (CCC) regarding the Proposed Commitments by Google and Apple, as well CMA's approach to monitoring.

As the UK Country Associate for the Consumer Choice Center, please do not hesitate to contact me at any stage for further information or discussion on consumer interests and rights.

Yours Sincerely,





### **About the Consumer Choice Center:**

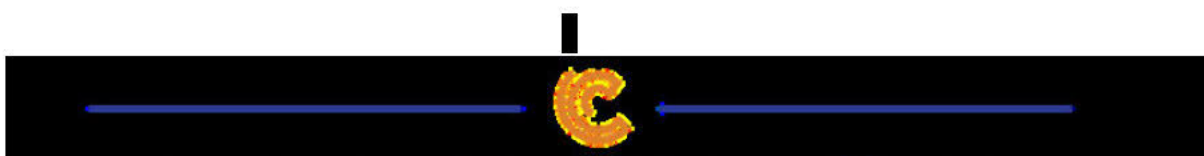
The Consumer Choice Center is a non-profit organisation dedicated to defending the rights of consumers around the world. Our mission is to promote freedom of choice, healthy competition and evidence-based policies that benefit consumers. We work to ensure that consumers have access to a variety of quality products and services and can make informed decisions about their lifestyle and consumption.

As an independent nonprofit organisation, the Consumer Choice Center relies on the support and funding from private donors. As described in our Code of Ethics, we strictly maintain editorial independence and do not give our funders any influence on editorial decisions. Our support comes from corporations, individuals, and foundations. We have a tiered membership model available to members who support us on a yearly basis, equalling silver, gold, and platinum status.

In the past and currently, we have received funding from multiple industries such as energy, fast moving consumer goods, nicotine, alcohol, airlines, agriculture, manufacturing, digital, healthcare, chemicals, banking, cryptocurrencies, and fin-tech.

Find out more at [www.consumerchoicecenter.org](http://www.consumerchoicecenter.org)

### **About the Author:**





**Written evidence response to the consultation regarding the Proposed Commitments by Google and Apple, as well CMA's approach to monitoring.**

## **1. Introduction**

The Consumer Choice Center (CCC) welcomes the opportunity to respond to the CMA's consultation on the proposed commitments from Apple and Google under the Digital Markets, Competition and Consumers Act (DMCCA) framework.

CCC is a consumer advocacy organisation representing consumers in the UK, Europe, and globally. Our work focuses on promoting policies that expand consumer choice, encourage innovation, protect competition, and avoid regulatory interventions that risk unintended harm to consumers.

While we recognise the CMA's objective of promoting fair competition, we remain concerned that overly prescriptive regulatory interventions in dynamic digital markets may undermine innovation, reduce product quality, and ultimately harm consumers.

## **2. General Observations on the Strategic Market Status Framework**

We reiterate our previously stated concern that Strategic Market Status (SMS) designation risks conflating market success with market failure.

Consumers choose Apple and Google ecosystems voluntarily. The mobile ecosystem is characterised by:

- Strong inter-platform competition between iOS and Android.
- Continuous innovation in devices, software, and services.
- Low switching costs relative to historical technology markets.
- Rapid technological evolution.

Any remedies or commitments imposed under SMS must be carefully calibrated to avoid:

- Reducing incentives to innovate.
- Weakening security and privacy safeguards.





- Fragmenting ecosystem integrity.
- Creating regulatory asymmetry that distorts competition.

### **3. Assessment of the Proposed Commitments**

#### **A. App Review Fairness and Transparency**

Greater transparency in app review processes may benefit developers and consumers if implemented proportionately. However:

- Prescriptive requirements that constrain platform discretion could impair Apple's and Google's ability to maintain safety, security, and quality standards.
- App store curation is a core element of product differentiation and consumer trust.
- Objective, measurable standards for fairness must not undermine platform governance autonomy.

The CMA should ensure that commitments do not inadvertently reduce security screening standards or slow innovation cycles.

#### **B. App Ranking and Self-Preferencing**

Transparency in ranking mechanisms is valuable in principle. However:

- Algorithmic disclosure obligations must protect commercially sensitive information.
- Platforms should retain the ability to integrate and promote their own services as part of legitimate competition on the merits.
- Prohibiting all forms of self-preferencing risks eliminating efficient product integration that consumers value.

Competition law traditionally protects consumer welfare, not competitor outcomes. Any remedy must demonstrate likely consumer harm, not merely competitor disadvantage.



### **C. Data Use Safeguards**

Commitments regarding developer data usage may enhance trust. However:

- Safeguards should be clearly defined and proportionate.
- Overly broad restrictions could impede product improvement and innovation driven by aggregate ecosystem data insights.

The CMA should avoid creating compliance burdens that disproportionately affect UK consumers through reduced feature development or delayed rollouts.

### **D. Interoperability and Access Requests**

Interoperability measures must be approached cautiously:

- Mandatory interoperability may compromise cybersecurity and system integrity.
- Ecosystem coherence is a key feature of differentiated platforms.
- Security-driven restrictions should not be second-guessed absent clear consumer harm.

We encourage the CMA to prioritise user security and privacy when assessing interoperability commitments.

## **4. Monitoring and Enforcement**

If commitments are accepted, monitoring must be:

- Transparent and evidence-based.
- Focused on measurable consumer outcomes.
- Flexible enough to adapt to technological change.

The CMA should avoid establishing rigid compliance metrics that:



- Incentivise box-ticking over meaningful competition.
- Freeze innovation pathways.
- Create regulatory uncertainty.

## 5. Consumer Welfare Standard

At all stages, the CMA should anchor its assessment in demonstrable consumer harm, not theoretical concerns or competitor complaints.

The UK mobile ecosystem has delivered:

- High innovation rates.
- Expanding app ecosystems.
- Continuous improvements in privacy and security.
- Competitive device markets across price tiers.

Interventions should not disrupt this trajectory without clear and compelling evidence of consumer harm.

## 6. Conclusion

The Consumer Choice Center urges the CMA to:

1. Ensure that any accepted commitments remain proportionate and innovation-friendly.
2. Protect platform security and privacy standards.
3. Avoid remedies that unintentionally reduce consumer choice or product quality.
4. Maintain a consumer welfare-focused approach rather than a competitor-centric framework.





Dynamic digital markets require regulatory humility. Safeguarding competition must not come at the expense of the innovation and consumer benefits that have characterized the UK's mobile ecosystem.

We appreciate the opportunity to contribute to this consultation and remain available for further engagement.

