

VodafoneThree

The CMA has issued a call for evidence welcoming views on the respective proposed commitments provided by both Apple and Google individually, as well as views looking at both approaches in the round.

App review, ranking, search and data collection

The CMA rightly highlights the UK App Economy as a powerful driver of national growth, supporting hundreds of thousands of jobs and enabling productivity gains across every sector. Apps now serve as a vital interface for both B2B and B2C services, and VodafoneThree is proud to play a central role in powering this ecosystem. Our purpose is to provide the resilient, nationwide digital infrastructure that enables UK businesses to innovate and deliver high-quality app-based services, supported by our £11bn investment in 5G Standalone and our expanding fixed network.

As an app developer, we are pleased to see Apple's commitment to provide 1:1 engagement during the App Review process, we also welcome Google's plans to host UK-based roundtables, creating a valuable forum for app developers.

Apple Interoperability

We welcome Apple's commitment to supporting third party interoperability requests.

For connectivity, the objective is to ensure that our connectivity services operate consistently across OEMs and device models, remain under our direct management so we can use scarce spectrum resources efficiently, and deliver high quality network performance. VodafoneThree has a clear obligation to run the mobile network fairly, efficiently, and effectively for all users, and that means engineering and operating for genuine device diversity: smartphones across multiple operating systems, FWA routers with very different traffic profiles, and a growing long-tail of IoT devices with distinct connectivity and power requirements. To do that well, we need to retain end-to-end control of the connectivity experience on our network, how devices authenticate, attach, hand over, prioritise, recover from impairment and receive service enhancements so that performance, resilience and customer outcomes are governed by transparent network policies applied consistently across the estate.

We welcome the CMA and Apple's focus on ensuring a fair, objective, and transparent approach to third-party interoperability. As an MNO, VodafoneThree already engages with Apple through a confidential, operator-facing process for connectivity-related interoperability and feature requests, and we continue to use this established distinct route for our generic interoperability needs. This same operator-facing process is also the appropriate and relevant channel where we seek to make a specific interoperability request under the SMS commitments, ensuring such requests receive appropriate consideration and prioritisation.

Responses to other questions

We welcome Apple's commitment to transparency, with annual reporting on interoperability requests, providing insight into the success of the commitments by showing the number of requests received, the most requested functionalities, and the timing of their consideration. Given that the interoperability framework will only have been operational for a short period, around a quarter, by Summer 2026, meaningful public reporting will be available from Summer 2027, once the regime has generated a sufficiently robust dataset to inform a comprehensive annual report. We would, however, welcome further clarity in respect of the level of detail which may be included in the published reporting and how commercial confidentiality of developers will be protected, particularly in circumstances where new products may not have launched.

While public transparency will take time to develop, the CMA will have access to significantly earlier and more detailed information through Apple's biannual confidential reporting commitments. We would welcome clarity from the CMA on whether it intends to publish any high-level summaries, thematic insights, or initial observations on how the regime is bedding in.