

Coalition for Open Digital Ecosystems

Feedback on Apple's Proposed Commitments on Interoperability

On 10 February 2026, the Competition and Markets Authority (“**CMA**”) published Apple’s proposed commitments (the “**Proposed Commitments**”)¹ in relation to the Strategic Market Status (“**SMS**”) designation of Apple’s mobile platform under the Digital Markets, Competition and Consumers Act (“**DMCCA**”).

In the context of the CMA’s open call for evidence and its invitation for stakeholders to submit views on the Proposed Commitments,² CODE welcomes the opportunity to contribute to this consultation and to provide CODE and its members’ perspective on the implications of the Proposed Commitments for openness and interoperability.

1. The Coalition for Open Digital Ecosystems

CODE brings together various companies that share a commitment to four core principles, namely: (i) opening up digital ecosystems through cross-industry collaboration; (ii) promoting seamless connectivity and interoperable systems to fuel innovation; (iii) empowering consumers to choose devices and services with ease; and (iv) nurturing an environment of open access.

CODE’s membership includes various tech companies of very different sizes, activities, origins and business models.³ CODE members share the conviction that open digital ecosystems are better for businesses, consumers and society.

CODE is committed to making a meaningful contribution to the pursuance of openness and interoperability by working together with industry players, civil society and public bodies to exchange ideas, encourage and promote research, and support open standards and interoperability.

¹ See “CMA SMS Investigation into Apple’s Mobile Platform Commitments Concerning App Certainty and Developer Requests for Interoperability Regarding the iOS and iPadOS Platforms”, 10 February 2026, available at: https://assets.publishing.service.gov.uk/media/69899adbd3f57710b50a9b86/apple_proposed_commitments.pdf.

² See Competition and Markets Authority, “Improving the way Apple and Google deliver app store services and enhancing iOS interoperability in the UK”, 10 February 2026, available at: <https://competitionandmarkets.blog.gov.uk/2026/02/10/improving-the-way-apple-and-google-deliver-app-store-services-and-enhancing-ios-interoperability-in-the-uk/>.

³ See <https://www.opendigitalecosystems.org/>. CODE members are Flywallet, Garmin, Google, Honor, Lenovo, Lynx, Meta, Motorola, Nothing, Opera, Qualcomm, Vodafone and Wire. CODE is an open coalition and any company that subscribes to CODE’s core principles is welcome to join.

2. Interoperability: Key to Open and Secure Digital Ecosystems

Effective interoperability on Apple devices would help to open up not only Apple’s “walled garden” ecosystem but also the broader mobile ecosystem by providing secure and effective use of features between Apple’s mobile ecosystem and third party products.

CODE believes that interoperability by design should serve as a foundational principle and primary objective of the CMA’s intervention in this area. According to this principle, operating systems (“OSs”) would be intentionally developed to support ecosystem-wide interoperability with third-party products in a secure and seamless manner. Interoperability by design would, over time, reduce the need for repeated and piecemeal interventions and monitoring.

Effective interoperability⁴ of Apple devices will help contribute to the Government’s growth agenda by affording businesses active in the UK the opportunity to innovate, compete and reach scale on a more open and level playing field, while increasing competition and choice for consumers. Effective interoperability within and across digital ecosystems is also consistent with the CMA’s April 2025 framework for “Delivering the 4Ps, i.e., pace, predictability, proportionality, and process, under the digital markets competition regime”⁵ (the “**4Ps framework**”), as informed by the pro-growth and pro-investment mandate of the Government’s Strategic Steer.⁶

As CODE has explained,⁷ interoperability promotes innovation, diversity, choice, fairness and contestability: consumers should be free to choose the products and services that best suit their needs and preferences, independently of considerations of the OS the device connects with, and to switch between different OSs without foregoing the benefits of products they already own. Similarly, interoperability can dramatically increase use cases and the addressable market for digital products and services, in turn incentivising investment and

⁴ See CMA, “Guidance on the digital markets competition regime set out in the Digital Markets, Competition and Consumers Act 2024”, 19 December 2024, at footnote 183: “*Interoperability refers to the ability of different devices, applications, systems and platforms to communicate with each other and exchange information and data effectively.*”

⁵ See CMA, “Delivering the 4Ps under the digital markets competition regime”, 30 April 2025, available at: <https://www.gov.uk/government/publications/delivering-the-4ps-under-the-digital-markets-competition-regime/delivering-the-4ps-under-the-digital-markets-competition-regime>.

⁶ See CMA, “Strategic Steer to the Competition and Markets Authority”, 15 May 2025, available at: <https://www.gov.uk/government/publications/strategic-steer-to-the-competition-and-markets-authority/strategic-steer-to-the-competition-and-markets-authority>.

⁷ See CODE submission of 19 February 2025, “Comments on the CMA’s SMS investigation into Apple’s Mobile Ecosystem”. See also CODE Oxera Report, “The benefits of hardware interoperability in the context of Article 6(7) of the Digital Markets Act”, 3 February 2025, available at: <https://www.opendigitalecosystems.org/the-benefits-of-hardware-interoperability>.

innovation. Interoperability builds bridges, connects digital ecosystems, harnesses positive network effects, and prevents lock-in. These benefits can explain why polling has revealed that 91% of consumers want smartphone companies to ensure that their devices, like earbuds, work equally well with products from other brands, and 80% of consumers found interoperability important when purchasing a new device.⁸

In CODE's view, design choices of new products must not be constrained by the particular characteristics of certain digital ecosystems, or the idiosyncratic preferences of a digital ecosystem controller. Importantly, effective interoperability can be achieved without compromising interests such as security, safety, privacy, accessibility and system integrity. CODE is confident that the CMA is particularly well-placed to contribute to achieving these objectives,⁹ and supports the CMA's efforts in this respect. This is particularly the case where there are well established industry protocols and technologies for interoperability, which enable connectivity and switching in a way that is safe, secure and continues to incentivise platform innovation.

The pre-existing level of openness of the OS and the extent to which secure technologies exist to enable interoperability are crucial points when assessing the need for and nature of any regulatory intervention. This is because an OS that is open by design, e.g., through being open source and providing relevant APIs, is inherently more open and "interoperable" than those designed to operate as closed systems.¹⁰ Apple intentionally designed its iOS, iPadOS and MacOS ecosystems as a closed "*walled garden*",¹¹ reserving itself the ability to decide to a large extent how, when and with whom it would interoperate, and also arbitrarily awarding itself a significant technical and competitive advantage relative to third parties and denying

⁸ See PollingEurope / CODE, "Perceptions on Hardware Interoperability, Report – February 2025", available on [CODE's website: https://www.opendigitalecosystems.org/updates/13/consumer-perceptions-on-hardware-interoperability--poll-results](https://www.opendigitalecosystems.org/updates/13/consumer-perceptions-on-hardware-interoperability--poll-results), pages 12 and 25.

⁹ See the Department for Business & Trade open consultation on "Strategic steer to the Competition and Markets Authority" published on 13 February 2025, available at: <https://www.gov.uk/government/consultations/draft-strategic-steer-to-the-competition-and-markets-authority/strategic-steer-to-the-competition-and-markets-authority>. The DMCCA features among the "*harnessing tools*" through which "[t]he CMA can support growth and investment". The document also states that "[t]he CMA should use the new DMCCA Digital Market Competition regime flexibly, proportionately and collaboratively to unlock opportunities for growth across the UK digital economy and the wider economy".

¹⁰ See the CMA's invitation to comment on its SMS investigation into Apple's mobile ecosystem, 23 January 2025, available at: https://assets.publishing.service.gov.uk/media/67911997cf977e4bf9a2f1aa/Invitation_to_comment.pdf, para. 14, comparing Apple's "*tightly integrated*" operating system and "*Android which is available on an open-source basis*."

¹¹ See, e.g., European Commission ("EC") Case AT.40437, *Apple - App Store practices (music streaming)*, of 4 March 2024, para. 100.

consumers in the UK and elsewhere many of the benefits of choice and competition that effective interoperability would deliver.

3. Assessment of Apple's Proposed Commitments

While CODE both supports the CMA in its efforts to deliver interoperability on Apple devices and welcomes any improvement to the *status quo*, CODE believes that the Proposed Commitments as they stand will be insufficient to ensure effective interoperability or many of the associated benefits and will prove less effective than measures taken in the EU to open up Apple's "walled garden" ecosystem. The Proposed Commitments also appear to fall well short of action taken by the European Commission ("EC") in the EU.

In more detail:

First, the Proposed Commitments cover only procedural clarifications with respect to how developers may request interoperability. Nothing in the Proposed Commitments obliges Apple to provide any interoperability solution to any developers nor to ensure such solutions are maintained over time. By contrast, the EU specification decisions cover both process and features,¹² whereas the Proposed Commitments only cover process-related aspects. The EU Features Decision identifies a set of nine key features¹³ that Apple must make effectively interoperable within a specified timeframe and without requiring developers to make and sustain numerous individual requests.¹⁴

Second, under the Proposed Commitments, Apple maintains very significant discretion over what it would consider to be an "*eligible request*." Apple would determine the eligibility of requests under the following vague, subjective and potentially self-serving criteria: "(i) *expected user and developer uptake*; (ii) *alignment with Apple's platform priorities*; (iii) *potential implementation costs*; (iv) *potential impact on user experience, performance/battery*,

¹² See Commission Decision of 19 March 2025 in Case DMA.100203, *Article 6(7) - Apple - iOS - SP - Features for Connected Physical Devices* (the "**EU Features Decision**"), available at: https://ec.europa.eu/competition/digital_markets_act/cases/202523/DMA_100203_1655.pdf and Commission Decision of 19 March 2025 in Case DMA.100204, *SP - Apple - Article 6(7) - Process* (the "**EU Process Decision**"), available at: https://ec.europa.eu/competition/digital_markets_act/cases/202523/DMA_100204_2073.pdf.

¹³ Namely: (i) iOS notifications; (ii) high-bandwidth peer-to-peer Wi-Fi connection; (iii) proximity-triggered pairing; (iv) background execution; (v) close-range wireless file transfers; (vi) automatic Wi-Fi connection; (vii) media casting; (viii) automatic Bluetooth audio switching; and (ix) NFC controller in Reader/Writer mode.

¹⁴ For details, e.g., on timelines, see further EC Press Release, "Interoperability (Questions and Answers): Apple 6(7) specifications", available at: https://digital-markets-act.ec.europa.eu/questions-and-answers/interoperability_en.

security, safety, privacy, integrity, and accessibility; and (v) potential impact on Apple's intellectual property rights."¹⁵

Moreover, Apple's proposed commitment on *ex ante* eligibility is limited to "*mak[ing] clear the kinds of requests that are eligible for consideration under the feedback channel*", and Apple will only consider "*requests for access to equivalent system and hardware functionality used by Apple services or accessories.*"¹⁶ This is extremely vague and will allow Apple, as it has done in other jurisdictions, to deny features available to Apple hardware knowing that developers have no objective means to prove that a functionality is used by Apple services.

By contrast, in the EU Apple may only adopt measures to limit interoperability when such measures are "*strictly necessary and proportionate*" to ensure that the interoperability solution "*does not compromise the integrity of the operating system, hardware and software features.*"¹⁷

Third, the Proposed Commitments allow Apple very wide discretion on how to handle interoperability requests, place significantly less time pressure and fewer deadlines on Apple to deal with interoperability requests, and provide for less intense oversight than is the case in the EU.¹⁸ According to the Proposed Commitments:

- Requests will be reviewed in order of receipt and Apple will merely "*endeavour*" to give an "*update on the status*" of a request within four weeks of the request being received.¹⁹

¹⁵ Proposed Commitments, Interoperability, para. 2(b). In respect of intellectual property rights, it became apparent in a public EU General Court hearing for Apple that took place on 21 October 2025 in cases [T-1079/23](#), [T-1080/23](#) and [T-214/24](#) that Apple has taken the position that its interoperability obligations intolerably interfere with Apple's intellectual property rights. Yet, Apple was unable to identify a single intellectual property right that had supposedly been infringed,

¹⁶ Proposed Commitments, Interoperability, para. 2(a).

¹⁷ See EU Process Decision, recital 26.

¹⁸ See EU Process Decision, para. 341. See also in the same Decision, Final measures, recitals 32–39. Apple must: (i) assess eligibility within 20 working days; (ii) issue a Project Plan within 40 working days, indicating inter alia the level of complexity of the work needed and an indicative timeline; (iii) allow developers 5 working days to comment; (iv) reply to that feedback within 5 working days (10 working days if the request requires significant engineering efforts); and (v) complete the interoperability solution within 6, 12 or 18 months, depending on the level of engineering effort required.

¹⁹ See Proposed Commitments, Interoperability, para. 1(c). Further, according to the Proposed Commitments, "*Apple will inform developers generally about forthcoming changes to iOS and iPadOS, including those resulting from eligible requests, in its beta releases*" (Proposed Commitments, Interoperability, para. 1(f)). Effective interoperability is predicated on developers' ability to update their apps to accommodate updates to operating systems or policy changes. The lack of mandatory deadlines permits Apple to leave developers in the dark about changes which may have serious implications for developers' apps.

- An internal to Apple review team,²⁰ which is separate from teams responsible for Apple apps and services, will assess requests.²¹
- Developers that Apple deems to be eligible will receive Apple’s decision and reasoning, and will be able to contact Apple during their review process.²²
- Apple will publish an annual “*transparency report*”²³ summarising request volumes of the most requested functionalities, timing, and a high-level overview of third-party ideas that Apple has integrated into its product development cycle. Although this report will cover ineligible requests, Apple will report only on the timing of reviewing what it deems eligible requests from Eligible Developers.²⁴
- Apple will make an annual public statement essentially self-declaring its compliance with the Proposed Commitments.²⁵
- Apple will provide the CMA with twice-annual²⁶ confidential updates broadly covering requests, complaints, review times and any significant changes to its process.²⁷

Fourth, in terms of reasoning of its decisions on third-party interoperability requests, Apple only commits vaguely to giving “*reasoning for [the] outcome*” of both accepted and rejected interoperability requests.²⁸ Moreover, there are no particular commitments on the level of

²⁰ According to the Proposed Commitments, the Apple review team has specific expertise in iOS and iPadOS interoperability and platform integrity, as well as general technical knowledge of iOS and iPadOS architecture and technologies. While Apple proposes not to use information received to give itself a competitive advantage, there is no specific requirement concerning the independence of this team and its decision-making.

²¹ This commitment is noticeably weaker than the one in the EU Process Decision Final Measures, according to which Apple which Apple must “*allocate sufficient resources in terms of staff, infrastructure and funding to ensure that it can assess, handle, process, implement and release all interoperability requests falling within the scope of Article 6(7) of Regulation 2022/1925 diligently, and within the timelines set out in this Annex.*” (recital 43).

²² Proposed Commitments, Interoperability, para. 1(e).

²³ Proposed Commitments, Interoperability, para. 3.

²⁴ See Proposed Commitments, Interoperability, paras 2(a) and 3(a)-(d)).

²⁵ Proposed Commitments, Interoperability, para. 4.

²⁶ Proposed Commitments, Interoperability, para. 5.

²⁷ This is unlike the situation in the EU, where decisions by Apple’s Interoperability Request Review Board must be sent to the EC “*without delay*” (DMA.100204 – Apple – Operating Systems – iOS – Article 6(7) – SP – Process Decision of 19 March 2025 – Final Measures, para. 21(d)).

²⁸ Proposed Commitments, Interoperability, para. 1(e).

detail,²⁹ how it will reason specific rejections on interoperability requests, what metrics will be discussed or other similar indications in the UK. Apple will merely communicate the outcome and the eligible developer will be able to contact Apple during the review and also raise concerns about the process via the dedicated compliance email address.³⁰ By contrast, the EU Process Decision requires that reasoning given by Apple must be “*detailed*.”³¹

Fifth, under the Proposed Commitments, developers who have had their interoperability requests rejected by Apple do not have any appeal process. Instead, the Proposed Commitments merely provide that Apple will create an email address that eligible developers can use to raise concerns about the process, but without even any obligation for Apple to monitor or adequately staff this communication channel or any timing requirements for responses).³² By contrast, the EU Process Decision provides developers with a two-stage review process, comprising (i) an internal review mechanism if the developer appeals within 15 working days from the communication of Apple’s notification of the rejection to that

²⁹ In the EU, Apple also provided scant detail in its DMA compliance reports. The EC even stated that “*none of the measures Apple outlined in its Compliance Report in order to comply with Article 6(7) of Regulation (EU) 2022/1925 specifically refer to, or implement an interoperability solution for, connected physical devices*”, referring to Apple’s November 2024 compliance report (now unavailable online, see Commission decision opening a proceeding pursuant to Article 20(1) of Regulation (EU) 2022/1925 of the European Parliament and of the Council on contestable and fair markets in the digital sector, Case DMA.100203, 19 September 2024, available at: https://ec.europa.eu/competition/digital_markets_act/cases/202440/DMA_100203_76.pdf, recital 12). For the recent reports that do not provide much further detail, see Apple, “Non-Confidential Summary of DMA Compliance Report”, 7 March 2024, available at: https://ec.europa.eu/competition/digital_markets_act/cases/202550/DMA_100123_122.pdf and Apple, “DMA.100123 – Apple, Non-Confidential Summary To Apple’s DMA Compliance Report of March 7, 2025, submitted pursuant to Art. 11(1) DMA”, 7 March 2025, available at: <https://www.apple.com/legal/dma/NCS-March-2025.pdf>. Apple now only mentions that it will give “*detailed explanation of the grounds for rejection*”, as already required by the Process Decision, see Apple, “DMA.100123 – Apple, Non-Confidential Summary to Apple’s DMA Compliance Report of March 7, 2026, submitted pursuant to Art. 11(1) DMA”, 7 March 2026, available at: <https://www.apple.com/legal/dma/NCS-March-2026.pdf>, paras. 18 and 29.

³⁰ See Apple, “CMA SMS Investigation into Apple’s Mobile Platform Commitments Concerning App Certainty and Developer Requests for Interoperability Regarding the iOS and iPadOS Platforms”, 10 February 2026, available at: https://assets.publishing.service.gov.uk/media/69899adb3f57710b50a9b86/apple_proposed_commitments.pdf, p. 13.

³¹ See EU Process Decision, recital 246: “*Where Apple has good reasons to reject a request for access for the purpose of interoperability, the assessment of the request should be made in a transparent manner and the rejection should be duly motivated*”. See also in the same Decision, Final Measures, recital 19(a): “[...] *Apple must give the developer a detailed explanation of the grounds for rejection. This explanation must include the specific reasons for the rejection, clearly outlining the criteria or requirements that were not met by the request.*”

³² See Apple, “CMA SMS Investigation into Apple’s Mobile Platform Commitments Concerning App Certainty and Developer Requests for Interoperability Regarding the iOS and iPadOS Platforms”, 10 February 2026, available at: https://assets.publishing.service.gov.uk/media/69899adb3f57710b50a9b86/apple_proposed_commitments.pdf, p. 13.

developer; and (ii) if the developer is not satisfied with the outcome of that mechanism, it may initiate the process for access to a conciliators panel.³³

Sixth, in terms of personal scope, the Proposed Commitments apply only to registered UK developers. This limitation means that only developers formally registered in the UK may stand to benefit from any interoperability request process. Consequently, many non-UK-based developers whose products are widely used in the UK are being excluded, which in practice narrows the range of third-party offerings that could benefit from interoperability and, as a result, severely reduces the overall potential gains for UK consumers and the UK economy.

Seventh, and relatedly, Apple also conditions eligibility on being in “good standing” with the Apple Developer Program, a requirement it likewise uses in its EU compliance report.³⁴ However, Apple fails to explain what is required to have good standing, nor how such a status is removed. Nor does Apple clearly set out the possibility for third parties to challenge adverse or arbitrary decisions concerning their “good standing”. This means that Apple essentially retains sole discretion to unilaterally change what this means and may do so without consulting developers.

Eighth, Apple expressly reserves discretion over whether a feature is provided only to the requesting developer or made available “*to developers generally for a fee.*”³⁵ Apple does not go into further detail over any potential fees and does not apply a benchmark or reasonableness requirement for such a fee.³⁶ This is all extremely vague and unlike the citation in the EU, where Apple must provide interoperability solutions free of charge.

³³ Under the EC specification decision DMA.1000204 on process, developers first have access to an internal review before a senior Interoperability Request Review Board, which issues a reasoned decision within 30 working days. If the matter is not resolved, the process may be escalated to an external conciliation stage, where independent technical experts examine the parties’ submissions, clarify the facts as needed, and provide a non-binding recommendation within three months. See EU Process Decision, Final Measures, recitals 20-24.

³⁴ See Apple, “DMA.100123 – Apple: Non-confidential summary to Apple’s DMA Compliance Report of March 7 2025, submitted pursuant to Art. 11(1) DMA”, 7 March, 2025, available at: <https://www.apple.com/legal/dma/NCS-March-2025.pdf>, p. 157.

³⁵ Proposed Commitments, Interoperability, para. 2(c).

³⁶ See Apple, “CMA SMS Investigation into Apple’s Mobile Platform Commitments Concerning App Certainty and Developer Requests for Interoperability Regarding the iOS and iPadOS Platforms”, 10 February 2026, available at: https://assets.publishing.service.gov.uk/media/69899adb3f57710b50a9b86/apple_proposed_commitments.pdf, p. 13.

4. Suggested Changes to the Proposed Commitments

In view of the foregoing, CODE strongly encourages the CMA to strengthen the Proposed Commitments. This is imperative to ensure that effective interoperability can become a principle of the DMCCA, with the resulting benefits for UK competition and consumers.

CODE suggests that the CMA should assess the Proposed Commitments and actions taken by Apple to promote interoperability through the lens of ensuring that existing industry standards for basic interoperability are adopted sooner rather than later. As highlighted above, there are several areas in the EU decisions that CODE believes are more detailed and more effective than corresponding measures in the Proposed Commitments.

Specifically, at this stage,³⁷ CODE respectfully suggest the following changes to the Proposed Commitments:

- Apple should be required to commit to and ensure that the interoperability solutions eventually offered to third parties are equally as effective as the interoperability Apple provides across its own products and services. Monitoring efforts by the CMA should ensure that Apple takes a genuinely proactive approach;
- Apple should proactively make future-oriented interoperability solutions generally available to third parties and for free, and not deprecate/degrade solutions once offered – even if regulatory scrutiny subsides – absent well-reasoned justification and sufficient prior notice;
- There should be clear, objective *ex ante* criteria for joining the UK Apple Developer Program, open to developers outside the UK, including those already eligible for interoperability requests in the EU.
- The meaning of “good standing” should be clarified e.g., by reference to objective criteria, so that Apple’s invocation of this concept can be effectively policed by the CMA. Apple should allow third parties to challenge adverse decisions concerning their “good standing”;
- Apple should be required publish *ex ante* detailed objective criteria for assessing requests in greater detail;

³⁷ E.g., assuming that, at this stage, the CMA is not contemplating requiring from Apple a set of commitments concerning specific hardware features.

- There should be increased clarity and obligations on Apple concerning the timing of the assessment and implementation of interoperability requests;
- Apple should be required to reason clearly any rejection of an interoperability request, and rejections should be closely scrutinised by the CMA for full compliance with the *ex ante* criteria;
- There should be a structured internal review process, with a neutral expert conciliation process for rejected interoperability requests, sharing costs fairly between Apple and developers, as well as an appeal mechanism;
- Apple should give sufficient notice to third parties of any adjustment or deprecation to a solution given that transparency to developers through specific requests and dedicated documentation, as well as to the broader community is essential; and
- Apple should be required to demonstrate that it is actually and effectively communicating bilaterally with developers, as part of ongoing reporting obligations to the CMA.

Finally, given that Apple’s commercial strategy centres on a closed “walled garden” model and that Apple has shown itself extremely reluctant to grant effective interoperability, even when under a clear legal obligation to do so, the CMA may eventually need to consider conduct requirements and pro-competition interventions for Apple in this area.

5. Concluding Remarks

Apple has been and remains extremely reluctant to grant effective interoperability to third parties. There is no precedent for Apple voluntarily extending interoperability. In order that UK developers and consumers can benefit alongside their European counterparts, an effective framework to ensure adequate safeguards for developers and accountability for Apple is vital. The CMA needs to be alert to this and be ready to impose more precise, demanding and firmer obligations should Apple’s implementation of the Proposed Commitments fail to deliver the benefits of interoperability to developers active in the UK and UK consumers.

CODE remains at the CMA’s disposal. In particular, if the CMA would value technical briefings and/or product demonstrations on current or emerging interoperability issues (especially as Apple’s compliance solutions emerge) we would be happy to provide these.