Individual responses to the call for evidence on Apple's and Google's proposed commitments

Respondent 1

I am writing to you directly to express my strong disagreement with the CMA's provisional decision to accept "voluntary commitments" from Apple regarding its Strategic Market Status (SMS) designation.

While I acknowledge the CMA's goal of securing quick resolutions, the proposed commitments—limited largely to "app review transparency" and "request mechanisms"—are wholly insufficient to address the structural lack of competition in the UK market. By accepting these weak measures, I fear the CMA risks cementing the UK's status as a "digital backwater" while regulators in the EU, Japan, and the United States are successfully dismantling these exact monopolistic barriers.

1. The "Fintech Focus" Misses the Wider Picture
I read your recent statement regarding these commitments with interest, specifically your comment that: *"These are important first steps while we continue to work on a broad range of additional measures to improve Apple and Google's app store services in the UK, for example by enabling more choice and innovation in digital wallets, boosting the UK's fintech sector and potentially supporting the roll out of digital IDs."*

While supporting the UK's fintech sector is a valid goal, pandering to specific industries like banking is not a substitute for comprehensive market reform. Recent data highlights that while increasing consumer choice in payments is undoubtedly positive, it is a secondary intervention that fails to address the fundamental inertia of the monopoly.

According to industry analysis from Chargeflow (2026), Apple Pay already commands a staggering 63% share of in-store mobile wallet transactions in the UK.* The CMA's strategy seems to rely on the belief that simply allowing third-party access will create competition. However, evidence from the Android ecosystem suggests otherwise. Unlike iOS, Android devices already allow third-party banks and apps to access the NFC chip for tap-to-pay transactions. Yet, despite this technical freedom, the vast majority of consumers still default to the pre-installed system providers (Google Pay and Samsung Pay) due to the immense power of defaults and user habit.

If "choice" has failed to significantly diversify the market on an open platform like Android, it is naive to expect that a simple "request mechanism" for hardware access on iOS will challenge Apple's dominance. Real competition requires more than just the theoretical ability to exist; it requires a levelling of the playing field regarding defaults, user experience, and friction.

2. The Economic Case: Overcharging and the 30% "Tax"
It is deeply concerning that the CMA is delaying action on app store fees given the

definitive legal findings here in the UK. In October 2025, the Competition Appeal Tribunal (CAT) ruled in *Dr Rachael Kent v Apple* that Apple has abused its dominant position by charging excessive and unfair commissions.

The Tribunal found that Apple's 30% cut is divorced from economic reality and is a result of monopoly power. By failing to regulate these fees or mandate competition that would naturally lower them, the CMA is effectively ignoring the findings of the UK's own specialist competition court. Furthermore, following the US court rulings in *Epic Games v Apple*, developers in America now have protections against "anti-steering" rules that UK developers still lack. It is unacceptable for a UK regulator to accept a status quo that leaves British businesses paying a "tax" that their international competitors are beginning to bypass.

3. Browser Engine and Interoperability Restrictions
The current requirement for all browsers to use Apple's WebKit engine on iOS stifles innovation and security research. The EU has already forced Apple to drop this requirement, allowing genuine browser competition (e.g., Blink and Gecko engines). The UK's failure to do the same leaves our web ecosystem stagnating.

Similarly, the lack of true interoperability for third-party devices (such as smartwatches and NFC payment systems) prevents UK fintech and hardware startups from competing on a level playing field. A "request mechanism"—where Apple acts as both judge and jury—is not a substitute for mandated, objective access to hardware APIs.

4. The Necessity of Sideloading and Global Alignment
The refusal to mandate sideloading or third-party app stores is a critical failure. The "security" arguments against sideloading have been disproven by the successful implementation of the Digital Markets Act (DMA) in the EU.

- Evidence of Success: Since the DMA's full implementation, EU consumers have enjoyed greater freedom without the catastrophic security failures Apple predicted.
- Global Alignment: Japan's *Smartphone Software Competition Promotion Act*, enforced as of December 2025, now mandates alternative app stores and payment systems.

By failing to match these standards, the CMA signals that it is more interested in maintaining cordial relations with Big Tech than in fostering a competitive economy. It is illogical that a UK consumer has fewer rights to the software on their device than a consumer in France or Japan.

5. Conclusion
The technology to open up the iPhone—to allow sideloading, alternative browser engines, and fair payment competition—already exists. Apple built it for the EU in

2024. Implementing these changes in the UK requires no new technical "innovation" from Apple; it merely requires political will from the CMA.

I urge you to reject these voluntary commitments and instead impose Category 1 Conduct Requirements that mandate:

1. True Sideloading: Allow installation of apps from any source, not just "approved" alternative marketplaces.
2. Browser Engine Freedom: Remove the WebKit requirement to allow for powerful web applications.
3. Fee Competition: Prohibit anti-steering provisions and allow developers to use their own payment processing without penalty.

The UK digital economy deserves a regulator that leads, rather than one that settles for the minimum concessions a gatekeeper is willing to offer.

Respondent 2

The motivation to secure commitments by Apple and Google on transparency, fairness, and certainty for app developers (and their users) is welcome. Both firms function as gatekeepers on their devices for app developers and users. Apple maintains strict control over which apps can even be installed on its devices. On Google's Android, there are at least two ways for users to install apps without the official app store and without Google being able to block the app installation: (1) by installing APK-files directly ("sideloading"), or (2) by installing apps via other Android app stores. Thus, the gatekeeping in Android is less pronounced, and the consequences of unfair rejections are less harsh on Google's Android than on Apple's iOS.

Given that Apple in the UK still maintains sole control over which apps can be installed on their systems, and given that no alternative app stores are allowed, one might have expected the CMA to seek more assurances and guarantees than from Google. Or indeed, as the European Union over the last few years did, to legally force Apple to allow alternative app stores on their devices to allow for marketplace competition. The proposed commitments do not achieve this and thus might fall short of what many app developers hope for.

In the following I evaluate the specific commitments offered from an economic perspective.

1. App Review

The Proposals: Apple and Google commit to reviewing apps based on published guidelines without self-preferencing, providing reasons for rejection, and maintaining appeal or discussion channels (even offering 1:1 discussion in the case of Apple).

Evaluation: These assurances might lower transaction costs and uncertainty for app developers, thus making investments and new developments more attractive. Users might benefit from the greater offering. A potential issue is that the review rules are still self defined, so it is still possible for the firms to design "neutral" rules that disproportionately burden competitors (e.g., privacy rules that hamper third-party ad models but not their own, security rules that limit functionality). To address this issue, the CMA might have to take a more active approach in influencing these review rules, based on feedback from app developers, rather than accepting the self-given rules by Apple/Google which might be tilted towards serving their own ends.

Moreover, since most submissions are usually updates of existing apps, a concern is that the commitment to review 90% of submissions within 24h is not as ambitious as it sounds. What happens to the remaining 10%? New apps upon their first submission to the app store with high investments and no revenue (yet) might exactly be the ones caught in this "review limbo" tail. The CMA could consider a rule that app review cannot take longer than (say) 72h in order to improve the worst outcomes. Of course, a balance is needed to protect users from malicious apps (the weeding out of which might require careful review).

2. App Ranking

The Proposals: Both firms commit to ranking apps based on user relevance and quality, promising not to self-preference their own apps.

Evaluation: The core issue is that the marketplace operators are also vendors on that marketplace. And even with the proposed transparency commitments, the training of the ranking algorithms provides enough leeway to produce desired results. For example, if the algorithm prioritizes a feature only Apple's/Google's apps currently possess, it is "fair" on paper but exclusionary in practice. And the firms have an incentive to rank more highly apps that are likely to yield more fees to them. Thus, the algorithms might prioritize more expensive apps over cheaper or free apps, and without having access to the algorithm itself, the CMA has a hard time to identify such cases or take action against them. The CMA's ability to ensure fair outcomes would be improved if there was a possibility for "app ranking algorithm auditing" to catch or deter gross misuse.

3. App Review Data Use Safeguards

The Proposals: Commitments to prevent the use of non-public developer data (collected during app review) to develop competing first-party products.

Evaluation: While commitments are welcome to use separate and independent teams doing the app review and doing inhouse app developing, the CMA has hardly any ways to check adherence as everything is done internally. From a principal-agent perspective, there is a strong information asymmetry, and the CMA may find it nearly impossible to prove that a new Apple or Google feature was inspired by "leaked" review data instead of a public observation or parallel innovation. The LIBOR manipulation scandal in the UK financial sector showed that distinct teams in the same organization find ways to conspire against third parties, especially when the stakes are high. A key concern in the effectiveness on this question is how robust the proposed "firewalls" within the firms are. Both firms have provisions that "legal review" or "data access requests" allow for the private review data to be shared. Yet it is not entirely clear why such data should be allowed to be shared beyond the team that is responsible for the app review.

4. Interoperable Access to Functionality (Apple Only)

The Proposal: Apple will create a dedicated channel for developers to request access to hardware/software features used by Apple's own services, with an update (not a decision)within 4 weeks.

Evaluation: This is possibly the most anti-competitive issue covered by these proposals: Apple's hardware monopoly. Other phone manufacturers such as Samsung want third-party developers to make the best use of their hardware to make the device more attractive for consumers. But unlike these manufacturers, Apple can withhold access to certain hardware functions or the control thereof. By denying access, they can make certain third-party app categories technically impossible (e.g., third-party NFC payment services, which would constitute major competition for Apple Pay, where Apple earns fees on every card transaction done via its service rather than via a competitor). And even beyond payment services they have strong incentives to limit competition by blocking access: Providing features via its own apps (which run only on iOS) rather than third-party apps (which might also be available on Android and competitor phones) is attractive because it can achieve user lock-in.Hence, the fact that access to hardware function can be requested is good, and that this access is guarded by fairer rules in the new commitments is certainly welcome. But still third-party competitors are unfairly disadvantaged by having to go through a process that can take weeks or months for approval, or can indeed lead to rejection without recourse. In addition, the criteria used to judge the requests—such as security, battery life, privacy, or especially "alignment with Apple's platform priorities"—are "elastic" concepts that can be easily used as pretext to reject a legitimate request. The latter criterion is so vague it should not be a valid basis for rejection. It would be a large improvement if, instead of a case-by-case approval process, access to more hardware functions was open by default as on Android. This would provide certainty for app developers whether certain functions will

be implementable ahead of making investment into new projects. And it would save a lot of “paperwork”.

Finally, access to Apple device NFC functions (used for card payments via phones) is easier in the EEA than in the UK. The proposed commitments here do not level this difference (paragraph 44 of the consultation document hints that more regulator action could be forthcoming if requests are denied too frequently, thus perhaps addressing the difference in the future). This limitation of competition in iPhone payment services is a first order concern that should be addressed in the interest of app developers, alternative payment services, and consumers alike.

Respondent 3

I am an indie software developer for Apple platforms. I have a Mac app on the store, and I’m working on my first iOS app.

Regarding interoperability rules that should be applied to mobile platform gatekeepers, I have the following concerns:

1. I want Apple (and Google) to be unable to ‘refuse’ or ‘reject’ an app for their entire platform for reasons other than “it’s illegal”.

2. I am happy for Apple and Google to take a reasonable commission for apps they sell on my behalf (eg on the App Store). But if Apple are not handling the sales and storefront, they should not be allowed to demand any money.

To go into some more detail: I am not saying that Apple should be forced to offer all apps in their App Store. They want to make a curated store, without any adult content, without gambling, without various things. That’s their right. But if I, a third party developer, make an app that doesn’t break the law, then there should be NO WAY that Apple can prevent me selling this to users and those users running it on their own phones.

Apple could implement this via sideloading. (BTW I hate the term, it just means “users installing software on a computing device they own”!) If they did allow sideloading, it should be mandatory that they cannot require apps to go through “review” or have any technical ability to “deny” them. And because with sideloading the developer (or another third party service) would be handling sales, merchant of record, etc, I don’t think Apple should be allowed to demand money. (Their “Core technology fee” for the EU is ridiculous — the owner of the very expensive iPhone has already ensured Apple is

fairly compensated for their work on the OS. Having more apps on the platform benefits Apple, they shouldn't get to double dip by charging developers!)

For what it's worth, all my app ideas fit nicely into Apple's app store. I personally would probably stick to putting my apps on the App Store. I don't think Apple's cut (15% for small developers) is unreasonable there, for handling all the financials and infra for selling apps. The review process is sometimes onerous but tolerable. However, if I ever do want to build and sell something that's legal but that Apple don't like, I would like the law to force their hand so that they cannot block me making and selling it outside of their store.

Respondent 4

It's clear that Apple have cultivated a monopolistic landscape when it comes to API access. This disadvantages independent iOS & iPadOS developers & thereby, end users to everyone's cost (bar Apple).

Apple's current approach of appearing reach out to the CMA & developer community is ultimately undone by the weakness of Apple's proposed changes. These will hamstring the (non-Apple) developer community from the start & continue Apple's unfair monopoly.

The CMA needs to impose a general interoperability framework on Apple, as they clearly won't do it themselves.

In the pharmaceutical industry, which to some extent mirrors the Apple/Google duopoly in Mobile technology, drugs cost a fortune to develop & patents last for 5 years, renewable annually to a maximum of 20 years.

The iPhone came out in the uk in 2007 & the iPad in 2010.

Apple should be on notice that their monopoly has run its course & unless they voluntarily assist in freedom of access to their APIs, it should be imposed on them in totality by 2027 (iOS) & 2030 (iPadOS).

Respondent 5

Dear CMA Team,

I am writing in response to the CMA's call for evidence on Apple's proposed interoperability commitments under the UK's Digital Markets, Competition and Consumers Act (DMCCA).

I welcome the CMA's efforts to promote fair competition in mobile ecosystems and to enable third-party developers to access key functionality in iOS and iPadOS. However, I am deeply concerned that the current voluntary commitments proposed by Apple fall far short of delivering the meaningful, enforceable interoperability outcomes that the CMA itself has identified as necessary to benefit UK developers and UK consumers.

1. Apple's Proposed Commitments Lack Meaningful Obligations

Apple's commitments reportedly consist primarily of:

- Establishing a feedback channel for developers to request interoperable access;
- Publishing limited statistics on these requests;
- Occasional reporting to the CMA on the process.

Crucially, Apple's written commitments state that a request creates no obligation or expectation that Apple will build or share the requested functionality — and that decisions will be taken at Apple's discretion "in line with *its commercial strategy and priorities*." This effectively allows Apple to continue deciding unilaterally what functionality third parties can use, without any clear legal requirement to share anything that might compete with its own products or services.

This structure gives Apple multiple ways to refuse interoperability while technically complying with its proposed obligations. Developers can be told their requests do not meet subjective criteria like "expected uptake" or "alignment with Apple's priorities," and these criteria can be applied in such a way that Apple rarely, if ever, shares the most strategically valuable APIs.

2. The Proposals are Too Narrow and Easily Circumvented

The CMA's own analysis rightly recognises that operating system access and APIs are essential to fair competition in mobile markets — determining what third-party developers can build and how well their products perform. However, limiting interoperability requests only to developers with UK-registered Apple Developer Program accounts excludes many entities that serve UK users. Nor are there binding deadlines, transparent decision criteria, or clear pathways for appeal.

Without firm obligations — including binding deadlines, transparency requirements, and independent oversight — Apple can legally comply without ever delivering meaningful interoperability. This essentially amounts to *self-regulation by dominant platforms*, which history shows has repeatedly failed to produce fair outcomes for developers or consumers.

3. Evidence from Other Jurisdictions Shows the Limits of Self-Regulation

The CMA should closely examine Apple's behaviour under the European Union's Digital Markets Act (DMA). In the EU, regulators have already been forced to proceed to "specification proceedings" to define exactly what interoperability obligations mean in practice — a signal that voluntary commitments alone are insufficient.

Even under EU DMA regimes, there are documented reports that Apple has resisted interoperability efforts and at times *blocked or limited access to required APIs* for third parties, forcing regulatory escalation.

Furthermore, Apple itself has publicly indicated that regulatory interoperability obligations in the EU may delay or limit the release of key product features, which underscores the company's strategic motivation to resist deep platform openness.

This pattern of behaviour underlines why reliance on voluntary commitments in the UK risks repeating the same cycle of delay and avoidance rather than producing genuine competitive outcomes.

4. The CMA Has Strong Powers Under the DMCCA — and Should Use Them

Unlike in previous years, the UK now has a robust statutory framework (the DMCCA) and the authority to impose binding conduct requirements backed by sanctions. Accepting weak, non-binding commitments as the primary remedy risks giving Apple and other dominant gatekeepers the regulatory cover to avoid real change — while delaying the very interventions that the CMA exists to deliver.

A more effective regulatory approach should incorporate:

- A clear interoperability obligation requiring free, non-discriminatory access to all APIs and platform functionality used by Apple's own services;
- Defined deadlines and an enforceable process for evaluating, granting, or refusing interoperability requests;
- Transparent criteria and public justification for refusals or limitations;
- An independent appeals mechanism to ensure fairness;
- Monitoring and enforcement tools similar to those the EU uses to ensure compliance and deter circumvention.

These kinds of obligations are not only consistent with achieving competitive outcomes, they are necessary to level the playing field and ensure UK developers and consumers benefit from innovation rather than restricted choice and lock-in.

Conclusion

In summary, I urge the CMA to:

- Reject reliance on voluntary commitments as a primary remedy in favour of binding, enforceable interoperability obligations;
- Look closely at the EU's experience and Apple's track record under the Digital Markets Act to inform the design and enforcement of UK requirements; and
- Ensure that the UK's digital markets regime protects competition, innovation, and consumer choice — rather than allowing dominant platforms to define the rules under which they must operate.

Freedom of competition, not platform self-regulation, should determine technological progress in the UK digital economy.

Respondent 6

I am deeply concerned about the CMA's current position with Apple to accept Apple's proposal to receive requests from UK developers for greater interoperability.

I am not involved in app development, but my primary concern is Apple's effective ban on other browser engines on iOS. As the CMA already know, Apple have ruled out competition with other browser engines on all of their platforms except macOS. Users do not have the ability to choose competing browser engines, and therefore cannot push Apple to support features or security advancements that are available on other browser engines.

I believe that, when Apple say that they will judge every interoperability request against their 'platform priorities' and 'potential implementation costs', they will always judge that most or all requests for interoperability will not meet their criteria.

I think this is a very reasonable concern, because Apple have never prioritised supporting these features and it is not in their interest to support them. Or, based on their implementation of the EU Digital Markets Act, they will continue with [redacted] compliance where they will provide an option for interoperability that no one would want to choose.

I believe that, without a requirement from the CMA to support competing browser engines, Apple will never choose by their own criteria to do so. So I believe it is very important the CMA requires Apple to allow competing browser engines, provide the platform APIs required to implement one, and prevent the kind of loophole in the EU DMA that has allowed Apple to implement it with [redacted] compliance. Browser vendors should be allowed to use their browser engines in the UK even if they are not based in the UK and without having to sign up to a scheme that charges them extra or differently to other apps on the App Store. The major browser vendors Mozilla and Google/Microsoft are primarily based in the US and should not be excluded from any

interventions made by the CMA. Those companies must be able to put their browser engines on iOS for there to be any browser engine competition.

Respondent 7

I'm a [redacted] web developer, with ten years experience, I lead a team here building websites and apps for small-medium businesses across the UK.

Regarding paragraph 12, "considering whether more stringent measures are necessary, if [..]" and "if we find Apple is [..] this will inform our pipeline of wider work - and we could bring forward specific interoperability requirements".

This sounds vague, non-committal, and missing the point. It "could"? Right, or it could not. That's saying nothing. "specific" is ironically not specific.

This would been a fine (albeit redundant) description of the status quo twenty years ago. Back then, we didn't know "if" some of these things would come about. Why is there an if-clause here today? These things did happen. Law suits and abundant discovery showing these are in our collective past. We have cases of malpractice (or at best, negligence) from Apple and Google in the news on a routine basis. Isn't all this a response to that?

This commitment reads as coming from an alternative universe in which the past twenty years of damage to businesses like mine, and customers like myself, didn't happen (lost opportunities and innovation for customers, loss of income, impaired customer relations, etc). That future "pipeline of work"? That's what we're waiting for. Where is it?

I do applaud the honesty and transparency in the headline: a proposed commitment from Apple and Google. Notice the absence of the CMA or UK GOV as an acting body, nor any passive verb where one could implicitly read that there exists a regulation or consequence in law. I'm very sorry but this largely read as PR, and I don't usually read, much less deeply review, other companies' press releases. We may or may not do what is needed. News at 11.

Respondent 8

Dear team,

[redacted]

Neither Apple nor Google can be trusted to implement these proposals in good faith.

The history of Apple's engagement with legal attempts to restrain their monopoly shows that they are unwilling to concede to anything which impacts their market dominance. Similarly, their engagement with developers, standards organisations, and customers shows their complete contempt for anyone who isn't fully on-board with Apple's own proposals.

Google has a similar history. They have reneged on [redacted]

Both Apple and Google should be forced to open up their platforms for interoperability. That means alternative app stores. In Goggle's case specifically, they must be forced to allow 3rd party security attestation for alternative operating systems. In Apple's case specifically, they must allow alternative browser engines.

UK growth is dependent on access to these platforms. Every business is at risk of these two monopoly providers unilaterally withdrawing a company's access to these platforms. UK businesses can be wiped out by [redacted] action on the part of these giants. Apple and Google effectively hold a "[redacted]" on the UK economy.

[redacted] The UK has an urgent need for digital sovereignty and this can only be achieved if both Google and Apple are forced to provide real interoperability and conclusively open their platforms.

To briefly address the points raised.

16) Both Google and Apple need to allow alternative app stores. Anything less is anti-consumer and must not be tolerated. Google has recently announced plans to lock down Android further for developers and Apple previously crushed attempts to develop alternative stores for iOS. Their past behaviour shows they cannot be trusted to act [redacted] on this issue without regulator involvement.

19) Both Google and Apple have a history of [redacted] rejecting apps submitted for review - often when they conflict with in-house developed apps. Their reasoning is often spurious and the only appeals process is back to the company. This is clearly insufficient. I welcome the attempt to have an independent appeal but I fear that it will not be truly independent.

Similarly, the complaints channels for both companies are [redacted] ignored. CMA should set, measure, and enforce targets on the timely resolution of complaints.

21) The idea that a "roundtable event" would meaningfully change Google's direction is laughable. They routinely ignore complaints and suggestions from larger partners. I do not believe this suggestion offers a viable route to change.

Any roundtable must be more regular (I'd suggest monthly) and be attended by the CMA. The CMA should also enforce any reasonable decisions made by this stakeholder engagement exercise.

43) This is unacceptable. Apple is refusing to allow alternative browser engines on its platform. The idea that they will objectively review such requests runs contrary to their past behaviour. Interoperability needs to be enforced by the CMA immediately. The time for patiently waiting for them to willingly change is over.

49) There is no mention of what the consequences will be of Apple and Google ignoring complaints. Without alternative app stores and enforced interoperability, these commitments are meaningless.

54 / 59) There is no reason these data cannot be published in real-time or daily. [redacted]

I conclude by pleading with the CMA to not capitulate to Apple and Google's demands. [redacted].

I run a small business in the UK. I am terrified that Apple and Google could destroy my business in an instant through their market abuse of the platforms. These proposals offer no meaningful improvement for UK businesses or consumers. I urge the CMA to get tougher and find a solution that will enforce our rights and help generate economic growth through increased digital sovereignty.

Respondent 9

Dear CMA Mobile SMS Team,

I am writing in response to the call for evidence on Apple's proposed commitments on interoperable access, ahead of the 3 March 2026 deadline.

I welcome the CMA's recognition that developers must have interoperable access to key iOS and iPadOS functionality, and that UK consumers miss out when that access is denied. However, I am concerned that Apple's proposed commitments are too weak to deliver those outcomes, for the following reasons:

1. No obligation to share anything. Apple's proposal explicitly states that receiving a request creates no obligation for Apple to act on it. Apple retains full discretion to deny access in line with its own "commercial strategy". This means Apple could deny every request from competing developers while remaining fully compliant with the

commitment.

2. Broad and subjective rejection criteria. The criteria Apple may use to reject requests — including "alignment with Apple's platform priorities" and "expected user uptake" — are so vague that they can be used to justify refusing any request, particularly from competitors to Apple's own apps and services.

3. Potential charges for API access. Apple has reserved the right to charge developers for API access. This could act as a powerful barrier to competition, particularly for smaller developers and startups.

4. Narrow eligibility. Limiting eligibility to developers registered in the UK Developer Program excludes the majority of apps and services that UK consumers actually use.

5. Non-binding timelines. Apple commits only to "endeavour" to respond within four weeks, with no binding deadlines and no certainty that approved requests will ever be implemented.

In light of Apple's track record — including its resistance to the EU's far more stringent Digital Markets Act obligations — I do not believe these voluntary commitments will deliver meaningful interoperability for UK developers or consumers.

I would ask the CMA to consider imposing a clear, enforceable requirement on Apple to provide free access to all APIs and operating system features needed for third-party interoperability with iOS, subject only to security restrictions that are strictly necessary and proportionate. This should include binding deadlines, transparent public reporting, and an independent appeals process.

Thank you for the opportunity to submit views.

Respondent 10

I would like to express concern that the current proposed commitments by Apple are insufficient and lack meaningful obligations to ensure genuine interoperability.

Equal access to hardware and software APIs is fundamental to enabling fair competition for both native applications and browsers. Without enforceable requirements, third-party browsers cannot realistically compete within Apple’s iOS ecosystem.

The CMA should impose a general interoperability requirement on Apple and Google in order to promote competition and also support innovation in the UK. If web technologies can compete on equal terms, UK businesses would have greater freedom to distribute software through the open web instead of relying on a single platform.

Respondent 11

I'd like to share some of my personal experience as software developer in the UK as it relates to Apple's continuing lack of support, in case it helps.

I lead a small software consultancy. [redacted]. As a small shop, we cannot afford to spend time or money in things that we will not be certain of. Apple's positioning where they do not commit to provide certainty to developers as to what will be made available and when is the worst type of statement I could hear. It gives me zero confidence to invest any resource in making things work for iOS.

As a small developer, we are able to come up with innovations and ideas that are not likely to be emerging from established (and well funded) software makers. Apple's lack of commitment thus negatively impacts the creation of exciting and innovative software for iOS, as it is just not worth the time and money to do so. There's another side to this story, which is the impact on potential consumers of the software: iOS users will miss out when software makers deliberately avoid building for iOS or using the most interesting features of iOS devices.

I have an example of this type of behaviour and how it impacts the public: several public transport applications which allow for users to carry a "virtual travelcard" in their phones in Spain are simply not available for iOS devices. I do not know the rationale behind this, but the impact on users is one of [redacted] discrimination, as it creates a two tier situation where some people can access the best fares and travel most efficiently, and others can't because "they bought the wrong phone". I've seen this in the Euskadi and Madrid areas where the app is only available for Android devices. (I have not done a thorough study - there might be other cases and in other countries).

This is not a behaviour I want to see everywhere.

[redacted] I believe that the CMA should hold them to a higher standard than Apple itself is proposing. Their suggestions of self-regulation, listening to "proposals" from developers and etc are all as good as nothing.

What would be genuinely helpful for software developers and consumers is having certainty that APIs will be available and exhibit the same behaviour in either platform, Android or iOS. This would in fact make it even possible to see other alternative operating systems emerge which do not tie their users into this de-facto duopoly.

As an example of why the duopoly is bad: with many banks moving to use more and more "app only" features, they also force users to use either Android or iOS, adding a level of exclusion and barrier of entry to their services. In practice, this means you cannot access the services or even install the apps in your own device if you are not using a device running one of these two operating systems which are at the whims of North American companies and over which users have no control. Even if they own the device!

If features were guaranteed to be available and interoperable, it would be easier to develop apps that do not tie users to any operating system. This would increase consumer choice, sustainability, security and many more.

I suspect the latter paragraphs are outside of the scope of this topic, but I wanted to mention it because even small actions have big consequences in technology, where things are built on top of each other. The fact that there's no agreement on what a minimum set of features might a phone offer brings a duopoly as a consequence. It's as if we could only buy light bulbs from one of two makers because only them have access to light bulb holders. It is a laughable proposition but it's where we are.

I hope the comments are helpful. Thank you for reading.

Respondent 12

There's no point in me recounting every detail in this article <https://open-web-advocacy.org/blog/apples-interoperability-commitments-to-the-uk-cma-promise-nothing/>

But let it suffice that as an IT professional since the early 1990s, I wholeheartedly endorse all the points made. It is of the utmost importance for the benefit of consumers and businesses generally and for the fostering of resilience, independence, innovation and competition that the most open, free, transparent, interoperable, equitable and secure practices prevail and are not subject to lobbying by the very companies that have self-interest in avoidance of such impositions.

Leadership of the CMA must demonstrate nonpartisan characteristics, whatever their previous history, or may be judged to have corrupted their obligation to act in the long-term public interest for both consumers & businesses (in the wider sense)

The recent prosecution of 'misconduct in public office' for various public figures looks like it may be the mechanism du jour for encouraging those in public office to cast aside their partisan interests in favour of longer term strategic and societal benefits.

Respondent 13

I am writing as a professional web and mobile developer; [redacted].

To be blunt, I am disappointed that the CMA is even considering these counter-proposals from Apple and Google.

These companies hold a duopoly on the mobile market. [redacted], blocking a vast network of services that cannot and will not ever get permission to be installed via their Play Store, despite the fact that many people use and rely on those services. These are not the actions of a company looking to make it easier for people to utilise their platform, but one concerned only with control.

At a personal level, this move will cut off archival and low-scale distribution. I can fully understand why Google enforces an ever-shifting baseline of technical requirements to be considered for distribution though their store. The Android OS changes with each major release, and Google, as a business, want the apps they are presenting to make the best use of those new features and improvements. But a lot of software, a lot of tools, do not need that new functionality, yet to remain in the Play Store you regularly have to update functions and API usage within the Android system, release an update, go back through the approval process, and all for absolutely no benefit to yourself or your users. I have felt this pain on projects in the past, where we have had to simply abandon apps that still worked completely, even on the latest version of Android, because we no longer had the time or funding to make these "required" changes.

Side-loading has historically allowed one avenue around that restriction, and it is a perfectly reasonable one. One that Google should maintain, and Apple should allow. It enables tools and services to still be used that do not need the mass-market reach of their respective Stores; tools that have been developed for niche communities or individual businesses, often for internal use.

And that's just one of the major ways that both companies create artificial hurdles for their competitors.

For me, in my role as a web-focused developer, one of the most ridiculous aspects of web development is the browser engine monopoly on Apple's mobile operating systems: iOS and iPadOS. Apple is perfectly happy to allow multiple browser engines to exist on its main desktop OS, but the constant restriction to Safari/WebKit on iOS/iPadOS is a source of eternal frustration, both from a development perspective, where it stifles adoption of new technologies, and from our client's perspective. I cannot count the number of times I have had to explain that a feature which works on Chrome or Firefox on Android can be broken on an iPhone, because *those browsers do not exist on that platform*. Because people can download "Chrome for iPhone" they believe they are using Google Chrome, but they aren't, they're using a reskinned Safari.

This locks down competition on one of the largest web platforms, provides Apple with a golden veto to effectively block web standards or new technologies that they do not like, and causes many issues for people who are effectively being lied to and then cannot understand why certain things do not, and cannot, work.

The only way I see to be able to fix this is to force Apple to allow other browser engines access to their devices. Right now that is not possible for two reasons: they control the App Store, and they control the APIs and internal OS integrations available on iOS and iPadOS. Until those restrictions are lifted, we will remain stuck in this situation.

It's interesting that Apple have effectively said that they will "play nice" and open up the required OS-level permissions and APIs to those services that need them, but I cannot believe that this will happen. It's certainly never happened before. And the browser monopoly that this creates, which holds back any possibility of new browser vendors from actually entering the web market properly, is not something that I see them giving up voluntarily.

The CMA must back its earlier findings and force Apple to allow other browser engines the same level of access that WebKit (and by extension, Safari) has on their mobile operating systems. As a user, I want to be able to use browsers like Vivaldi and Firefox on these devices, and trust that they are actually keeping my data secure, in line with those organisations stated missions and past behaviour. I cannot (and do not) trust Apple in the same way.

At the same time, as a web developer, I cannot help but believe that we would have seen a much greater level of adoption of Web Apps (sometimes referred to as Progressive Web Apps, or PWAs) had Apple (and Google, to a lesser degree) not purposefully held this technology back. Even today, after some significant improvements, Web Apps are treated as second-class software on Apple devices,

preventing them from truly offering an equal experience to the mobile apps distributed through their App Store.

Again, this isn't just bad for developers, who are now stuck facing the decision of whether they must build the same service on the web, on Android, on iOS, and on iPadOS, all separately, but its yet another way that both companies lock people into their ecosystems. The amount of apps that are available on iOS, which could easily be cross-platform websites, but aren't because they either need access to APIs that Apple will not allow a web app to access, or they simply cannot afford to take the business cost of running both an iOS app and a web app at the same time, is enormous. And for each one of those services, there are countless people who may not want to stay on iPhone, but who cannot meaningfully migrate.

So those are some of the frustrations and constant struggles I have regularly, as both a consumer/user of these products, and as a developer working on these services. Nothing that either company has said makes me believe that these frustrations will get better. I urge the CMA to take bolder, stronger action, not just for consumers and businesses in the UK, but in showing —- as other nations are already doing —- that we can have a better, less locked-down web ecosystem.

Finally, you say that it is "important that app developers have confidence that the app store... will operate fairly and objectively" but I have no such confidence. Too often, once an app that directly competes with either of these companies own services gets too large, it suddenly finds itself demoted in the rankings, restricted from updates, or offered a vast sum of money to be "acquired". Within months or years, that app has gone, depriving users of a better experience, and developers of a truly fair, open market.

[redacted], I have even less faith that this statement can be meaningfully met whilst developers are forced to use these specific App Stores. Enabling true browser choice on both platforms; maintaining (or providing, for Apple) more ways of distributing and installing software on devices; and enforcing regulations that require technologies like web apps to actually function and have the same level of device control as native, "vetted" mobile apps, these are all table stakes at ensuring that UK citizens can continue to use their purchased devices in the ways that they want, and enabling UK businesses to invest in digital services that they know will be able to reach their audience.

That cannot be achieved by simply saying that app stores must have greater transparency, and that Apple can "review requests for interoperable access". That path only benefits the largest organisations, with the thickest wallets. I work for small teams in public-funded organisations; I've worked for NGOs and charities. There is no scope for that kind of bureaucracy, no budget for developer accounts/licenses. And that's

ignoring that the wording of both proposals is so vague as to allow them to effectively deny access without really explaining why. So long as "it's against our business interests" is a viable option, there can be no meaningful change. The duopoly will continue, and this process will have gained nothing.

For the UK tech sector to truly thrive, we need parity with the corporations in the US. It is not meaningfully likely that we can do so at a hardware level, at least not right now, but we could be making inroads at a software level if:

- Both mobile operating systems are forced to allow installation via additional app stores and "side-loading"

- Apple is forced to allow browsers other than its own, fully controlled version of Webkit/Safari on their mobile OSes

- Both Google and Apple are required to provide full parity of API access to web applications and third-party installed applications as mobile apps downloaded via their own app stores get

- Neither company can meaningfully prevent a user from installing a legal service or app on their owned device

Please reconsider your stance and ensure that we are moving towards this reality.

Respondent 14

I'm a software professional with decades of experience, a user of both Android and iOS, [redacted]

I'm concerned that the proposed commitments from Apple and Google will do very little to resolve the existing problems I see as a user, developer & business owner in the market.

My particular concerns relate to Apple's interoperability access. Nothing in the proposed plan sounds like to actually result in an increase in interoperability - it sounds far more likely that it will create a forum for Apple to formally document and reject such requests. I expect [redacted], claiming that many perfectly secure and practical approaches are too dangerous to be deployed.

Instead, there should be a strong expectation of interoperability in almost all cases. Apple should have the power to object with concrete reasons, within a strict deadline from the request, with an interoperability default applied in all cases but the most security sensitive scenarios: where users are exposed to specific risks, likely to be incapable of making their own safe choices to manage this, and Apple is uniquely

placed to defend against that (i.e. security cannot be appropriately delegated to apps and then verified within the standard review processes). Any interoperability offered by Android without widespread reports of abuse should be considered as automatically passing this requirement, as this demonstrates that technically practical & secure approaches exist.

This interoperability must be unconstrained: available using standard APIs, and without extra fees or unnecessary restrictions applied. Any such restrictions would enable lock-in and implicitly reduce the effectiveness of these resolutions, destroying the level playing field.

I'm especially concerned about restrictions like this relating to browsers, where vast experience and usage has clearly demonstrated what can be securely implemented, but Safari and wider support for PWAs remain far more tightly constrained on both iOS and Mac than other browsers.

Going beyond the proposals in the call to evidence, I have other notable concerns that are not addressed by these interventions. Problematic practices include:

- Android's action to limit installation of 3rd party apps from app creators who are not registered with Google (https://keepandroidopen.org/). This creates unnecessary barriers to distribution of apps from developers to users, and does not meaningfully increase security, while blocking competition within the market. It creates significant issues especially for app store platforms like F-Droid which provide direct competition to the Google Play Store. While Google suggested they would partially withdraw from this plan in some circumstances, in practice no such change has happened. This clearly also applies already to Apple and requires intervention, but I am very concerned by Google's backsliding into a similar position.
- Certifying certain mobile devices as "Play Protect certified" and then strongly encouraging all app developers to enable "Play Integrity" on their apps, which (among other features) blocks installation any use on non-"Play Protect certified" devices. This is anti-competitive against non-Google Android devices and operating systems (OSs). While these devices are fully capable of running normal Android apps, this creates an artificial barrier that makes allows only Google's approved partners into the mobile device market. Many users report the common banking, government or similar essential apps enable this setting (such orgs are often required by compliance teams to enable all security options as standard policy) thereby making non-Google-approved devices unusable for daily life. This makes all kinds of alternative Android OSs such as GrapheneOS non-competitive, and almost entirely blocks the usage of the emerging Linux-

based-but-Android-compatible OSs like Ubuntu Touch, SailfishOS and PostmarketOS, eliminating an entire category of competition in mobile OSs from the market.

- Google Pay itself acting as one of the apps using "Play Integrity", making contactless payment support near impossible on alternative Android OSs or devices. Google Pay and Apple Pay act as a duopoly over the rapidly growing mobile contactless payment market. Artificially restricting contactless Google Pay use on non-partner devices and non-approved OSs is an abuse of their market power in digital payment method to protect the corresponding duopoly in mobile devices.

On these topics, I would suggest:

- Banning the proposed "Developer Verification" requirement. Any developer producing Android-compatible software should be able to provide it to any user with an Android-compatible device, as artificial restrictions on this reduce competition in the app & app store markets. Restrictions on known-bad app files (apps which have been reported or can be actively detected as dangerous, similar to desktop virus scanning) and an initial warning when enabling a new source of app installations is reasonable, but neither require Google to act directly as an intermediary in these interactions.
- "Play Integrity" restrictions that block installation or launch of an Android app on an unapproved Android device be prohibited. Users should be able to run Android apps on the Android-compatible device of their choice without unnecessary restriction. Other integrity features under this banner can be beneficial in limited scenarios, but this specific restriction directly eliminates all competition to Android in the OS market.
- Requiring Google to offer support for contactless Google Pay payments on all technically capable devices, without artificial restriction.

Respondent 15

I am writing in response to your call for evidence on Apple's proposed interoperability commitments, ahead of the 3rd March 2026 deadline.

I am a software professional with 20 years of experience building apps, web applications, and websites across small, medium, and large organisations in the technology industry. Throughout my career, Apple's conduct has been a consistent and

recurring problem at every company I have worked for. [redacted]

Safari's state of development is, in my professional view, reminiscent of the worst era of Internet Explorer. This is not hyperbole: it is a widely shared assessment among web developers who must contend with it daily. Across every organisation I have worked in, considerable engineering hours have been lost working around deficiencies and [redacted] limitations that Apple introduces through this behaviour. These are hours that could otherwise be directed toward innovation and building better products for UK consumers. This cost is not abstract — it is borne by small startups and large enterprises alike.

Apple's proposed commitments do not address any of this. They amount to a promise to consider requests while retaining full discretion to deny them, charge for API access, and apply vague criteria that can trivially be used to reject any inconvenient request. [redacted]

I therefore urge the CMA to impose a clear, enforceable, and binding interoperability requirement on Apple, with defined deadlines, free API access, an independent appeals mechanism, and the burden of justification for any restrictions placed squarely on Apple. Accepting the current proposal would hand Apple regulatory cover while delivering nothing meaningful for UK developers or consumers.

Thank you for the opportunity to contribute.

Respondent 16

Dear Competition and Markets Authority team,

I am writing to register my **deep concern and disappointment** with the current proposed commitments from Apple and Google on app store certainty and interoperability. While I appreciate the CMA's efforts to address competition issues within mobile platforms under the Strategic Market Status regime, the commitments currently being consulted on fall far short of what is necessary to ensure real choice. Innovation, and competition in the UK digital economy.

The proposed commitments from Apple and Google are framed as steps toward more "certainty, transparency and fairness" for developers. However these commitments are **non-binding, voluntary and superficial** in nature. Apple's interoperability promises in particular amount to little more than a feedback channel and occasional reporting obligations, with full discretion retained to refuse meaningful API access on arbitrary grounds. This approach fails to deliver the effective interoperability that UK developers need to build competitive products and services, and it fails to address the fundamental market power that Apple and Google exercise over the mobile ecosystem.

Because of this, the current proposals risk being an empty gesture rather than a genuine regulatory intervention. By allowing dominant platform owners to define the terms of their own restraint, the CMA risks **locking in entrenched market power**, rather than dismantling it. These weak voluntary commitments will not lead to lower prices, greater choice, fairer access to key platform features, or meaningful competition with native platform services.

The CMA has statutory powers under the Digital Markets, Competition and Consumers Act to impose enforceable interoperability obligations, coupled with clear deadlines and measurable performance requirements. These powers should be used, not sidelined in favour of toothless promises. Without binding requirements, the CMA will have no reliable means to ensure that platform owners cannot backslide, ignore requests from developers, or interpret obligations in ways that preserve their dominant position.

For these reasons, I urge the CMA to:

1. **Replace voluntary commitments with legally enforceable conduct requirements** on app review, app rankings, use of developer data, and interoperability.
2. **Mandate a default interoperability regime** that requires Apple and Google to make key platform APIs and system functions available on fair, transparent, and non-discriminatory terms.
3. **Set clear deadlines, measurable outcomes and independent oversight** for compliance, with meaningful sanctions for non-performance.

The UK must not let another year pass with ineffective regulation while innovators, startups, and UK consumers pay the price of closed ecosystems and restricted competition. I urge the CMA to step up, use its statutory powers, and deliver outcomes that truly open digital markets in the UK.

Respondent 17

Thanks for you work!

Respondent 18

I own an iPhone. When I meet up with the rest of the family, we can take photos on our iPhones and use AirDrop to send them to each other, but only if we're all using iPhones. My girlfriend has an Android phone, and is lucky if someone decides to email her a copy of the photos. I welcome the news that some Android phones are now able to use Quick Share to send photos to iPhones. That feature isn't available on every Android phone yet, but stories like that give me hope for better interoperability in the future.

I am a software engineer, but I can't write apps for the iPhone because I don't also own a Mac. I can, however, create simple websites that I can then run on my iPhone, but they are limited in what they can do because many web APIs aren't available on Safari. Web apps can't be monetised by Apple in the same way that apps are on Apple's App Store, so I guess Apple doesn't feel incentivised to make any improvements to its browser. Web apps on iPhone could be so much better if Apple allowed other browser engines to run on iPhone, but that won't happen unless the regulators intervene.

I would also like to write my own apps for smartwatches, but I can't do that for an Apple Watch because (again) developers can only write Apple Watch apps on a Mac. I'd like to buy a Pebble Watch instead and pair it to my iPhone, but I've read that Apple won't allow certain features to work properly when paired to a Pebble, resulting in a degraded experience for people who want to buy another Apple device. The creator of the Pebble wrote a piece about his frustrations with developing for Apple: https://ericmigi.com/blog/apple-restricts-pebble-from-being-awesome-with-iphones/

Customers choose Apple for the quality of the hardware. Apple devices all feel premium; nothing rattles, every button feels nice to press, every hinge has the perfect tightness. The devices are also fast and incredibly power efficient. These should be reasons enough for Apple to retain market dominance. However, because of the lack of interoperability, some customers (like me) then feel trapped because of Apple's software practices, ensuring there is no reasonable alternative to using iCloud for data storage, or Safari for browsing, or the Apple Watch for putting the Internet on my wrist. Even with stronger interoperability requirements, I'm sure the majority of Apple's customers would remain loyal to the premium brand.

I would urge the CMA to reject Apple's initial weak commitments to interoperability and be more forceful, so that Apple has to open up their APIs to allow better interoperability between devices. This would allow for greater competition from a variety of new device manufacturers, resulting in more choice for the customer. If an Apple Watch is allowed

to dismiss a notification from your iPhone, so should a Pebble Watch. And it should be up to the user to decide if they trust a third-party manufacturer with access to their phone's notifications; that decision shouldn't be gatekept by Apple.

Respondent 19

I would like to send my feedback for the Call for Evidence particularly in regard to Apple.

Their commitments make no mention of allowing developers to submit an app using a competing Browser engine to Safari - and the statement "alignment with Apple's platform priorities" could even suggest that they certainly do not intend to allow this.

At present all web developers on iOS and iPadOS are forced to use the Safari rendering engine to render websites. This means the pace of the web to innovate on new features is limited by Apple's willingness to implement said features. Without direct competition in this space, they are free to choose to delay or hobble certain features in such a way that it is not worth Web Developers implementing them.

As a web developer I have encountered two such delays due to Safari not supporting them:

- Website Notifications
- Offline Reading

These features were available in Chrome and Firefox on other platforms for several years, but because those browsers on iOS are forced to use Safari's rendering engine (webkit) I was unable to build them into my website, as a significant number of users would not be able to use them.

There needs to be true competition in this area, to prevent one company being the gatekeeper for the evolution of the open web standards and features.

Other browsers need to be fully available to install on iOS - and it needs to be in the same manner as any other app in order to be a level playing field. The average user won't understand if there are special instructions for installing alternative browsers.

Other markets have mandated that Apple allow other browser rendering engines. However, in those markets Apple appear to be operating under [redacted] compliance, where it is technically possible to do, but has so many hoops to jump through that it is unfeasible for any developer to do so.

They include a requirement that the developer must be registered in that market, and can only release the app to said market. This means that the developer has to build two browsers for different international markets, which is not a cost-effective or maintainable way to operate.

Alternative browsers are available to install on macOS, and other operating systems such as Windows and Android - and they don't cause significant security concerns there. As a modern operating system, iOS is very capable of working the same way. Concerns about battery life aren't valid, since it has been proven that other browsers can actually be more efficient than Safari, and a browser that uses less battery is a selling point so will improve competition in that area. Their argument with regard to "potential impact on user experience, performance/battery, security, safety, privacy, integrity, and accessibility" is also not valid as they can all be used as selling points for alternative browsers. Firefox, for example, sells itself as "Privacy as Standard" and Chrome sells itself as "The browser built to be fast, safe & yours". These browsers can compete on these merits and they do outperform Safari on most of them on other platforms. So it is not a valid argument to say that only Safari meets these criteria.

Respondent 20

Apple's claim is that iOS' lack of APIs allows Apple to retain a secure platform within iOS, but the same levels of scrutiny do not apply to Apple's other operating system, macos. Either Apple are conceding that iOS is more secure than their desktop operating system macos, due to locking down of APIs; or they must concede that macos and iOS are both as secure as one-another and that the restrictions on iOS are unnecessary.

Business and developers can deliver applications on macos that far exceed the capabilities on iOS. macos applications have access to low level APIs and device data in ways which iOS does not. There are no additional restrictions placed on developers for macos, and developers to not need to contact Apple to use these low level APIs, for example if a business wanted to build an assistive technology application that listened for keyboard input in macos they would be able to deliver this app to users, and users would be prompted to allow access to low level APIs without either the user or developer ever having to contact Apple. Businesses and developers can offer applications to users of macos outside of Apple's App Store, and can be distributed on alternative app stores (one example being the "Homebrew" app store which offers a huge variety of software which could reasonably run on a version of iOS without the artificial restrictions in place).

This is not a question of capability. Apple's flagship iOS devices such as iPhone and iPad have equal computing power to their low and mid-range workstations and laptops such as the Macbook. This perhaps will become especially apparent if Apple's rumoured new laptops (Macbook Neo) will end up sharing almost identical hardware with their flagship phones (https://www.macrumors.com/2026/03/02/low-cost-macbook-incredible-value-apple/). This is not just a theoretical concern. Many reviews of Apple's flagship devices such as iPad often critique the operating system and its lack of capability

compared to their desktop counterparts. There is an intentional divide between the two operating systems. This means certain applications simply cannot exist in iOS as they do in macos, or Android, or Windows, or Linux.

Apple's self-policed system seem like a catch-22. To offer some points to this:

Apple's criteria for assessing whether or not an application can gain access to additional APIs includes "expected user and developer uptake". This seems to suggest Apple will not be willing to enable APIs unless there is demonstrable proof of a user base. How can an independent developer building a novel new app prove such a user base if they build an application that uses these APIs in the first instance? It seems trivially easy for Apple to, for example, suggest that no users will use an NFC Payment API due to the lack of existence of NFC Payment apps on their App Store, while ignoring the fact that those apps cannot exist on the app store without those APIs!

Apple's criteria also allow them to charge a fee for enabling API access. This can effectively close of independent developers from access to these APIs. Apple could, it seems, easily charge prohibitively high fees for introducing new APIs therefore precluding this facility from all but incumbents or mega-corporations.

These types of restrictions seem harmful to independent developers or new businesses or SMEs, and seem to give Apple an unfair advantage in the mobile operating system market, which is an advantage Apple do not have in the desktop operating market.

I will also add, any level of compliance that is not inline with EU's DMA will create more difficulties for developers who aim to address both the UK and EU markets. It is already a challenging landscape for businesses to navigate the regulatory frameworks of the two areas, and a divergence from EU regulations here will further hamper the success of businesses in the UK. I fear we will see _less growth_ in various technological markets in the UK, including payments, internet, social, and AI - largely due to the artificial restrictions Apple places on their products.

Thus, I have two recommendations to the CMA:

Ensure that all regulations are inline with EU, giving UK users and developers equal access to the same functionality as our EU siblings. This includes opening up key APIs, offering access to alternative app stores and web browsers, and fair pricing.

Enforce an "equal restrictions" toward both Apple and Google: any API that users and developers can make use of on one platform should be available on all equivalent platforms. This is to say: if a user can install an app with a certain capability on their desktop operating system, then (provided the same hardware capability exists) there should be no additional restrictions placed on their mobile operating system, and vice-versa.

Respondent 21

Please find below my response to the Call for Evidence regarding Apple's proposed interoperability commitments. I am submitting this as a UK-based hobbyist developer directly impacted by mobile operating system (OS) gatekeeper policies.

Apple's proposed commitments present a significant challenge to effective regulation. These commitments are voluntary in nature, depend on subjective rejection criteria that lack clarity, are geographically restricted in their application, and create opportunities for the monetisation of fundamental system APIs. Crucially, they fail to address the core issue of gatekeeper self-preferencing. Historical regulatory precedent and the practical realities facing independent software developers demonstrate that Apple's current restrictions operate as a substantial deterrent, actively discouraging grassroots innovation before it can take root. Given these limitations, the CMA should reject these easily circumvented proposals and instead leverage the Digital Markets, Competition and Consumers Act (DMCCA) to impose a legally enforceable, general interoperability requirement that would provide genuine protection against anti-competitive behaviour.

Below are my direct responses to the consultation questions:

1. Should a general interoperability requirement be imposed on Apple and/or Google?

Yes, unequivocally. Interoperability is the bedrock of digital competition. Without a mandatory, general interoperability requirement, competition and creativity are artificially constrained by the gatekeeper rather than by consumer choice. A general requirement to share APIs on equal terms is the only viable method to lower switching costs and dismantle consumer lock-in.

2. Are Apple's proposed commitments likely to deliver fair and effective API access and end self-preferencing?

No. As the CMA noted in Paragraph 9 of the consultation document, commitments are inappropriate where measures can be easily circumvented. Apple's proposals represent a regulatory blank cheque. Specifically:

- **Subjective Rejections**: Apple reserves the right to deny requests based on vague criteria such as "alignment with Apple's platform priorities" (Para 43). If an API threatens their closed ecosystem, they can simply deny access.
- **Geographic Restrictions**: Restricting the feedback channel only to developers registered in the UK ignores the global nature of software development and open-source collaboration.

- **Monetisation**: The commitments leave room for Apple to charge developers for basic system API access. This effectively prices out hobbyists, students, and independent creators who drive early-stage tech innovation.
- **Weak Deadlines**: Apple only commits to "endeavour" to respond within four weeks, leaving independent developers in limbo without a binding, independent appeals process.

3. Personal experiences where APIs or equivalent platform functionality were denied?

While I have not been formally denied an API request via a corporate appeals process, the systemic unavailability of APIs directly impacts my work. As a hobbyist, my most valuable resource is time. The well-documented existence of "private APIs", capabilities Apple uses for its own first-party apps but strictly prohibits third-party developers from accessing, acts as a significant deterrent. I, like many independent developers, will not even begin conceptualising or building an application if I know the equivalent platform functionality is locked behind a gatekeeper wall. The unavailability is structural; it prevents innovative UK projects from ever leaving the drawing board.

4. Would an interoperability requirement of this kind lead to greater growth and innovation in the UK?

Yes. Competition and open access, not gatekeeper benevolence, drive technical innovation. Hobbyists and independent developers are often the start-ups of tomorrow. When platforms are opened, developers of all sizes can experiment and build genuinely novel features without hitting arbitrary gatekeeper walls. Levelling the playing field ensures the UK remains a vibrant hub for grassroots technical talent.

Views on Monitoring and Alternative Recommendations (Para 64)

While I note the CMA's proposed metrics for monitoring (KPIs, public reporting), these oversight mechanisms will be ineffective if the baseline criteria for API rejection remain entirely at Apple's subjective discretion. You cannot effectively monitor a system designed to be circumvented.

The CMA has rightly stated it will not pursue commitments that are easily circumvented. I urge the CMA to enforce a comprehensive requirement that includes:

1. Mandatory, free access to all APIs necessary for third parties to interoperate with iOS.
2. Strict, binding deadlines for API access requests.
3. The burden of proof resting on the gatekeeper to justify any security-based API restrictions as strictly necessary and proportionate.

Thank you for your time and consideration of this evidence.

Respondent 22

Dear CMA Mobile SMS Team,

I am writing to express my strong support for the open web and fair digital competition, and to urge the CMA to reject Apple's proposed interoperability commitments as wholly inadequate. These commitments do not constitute meaningful reform — they offer Apple full discretion to deny every request it chooses, while providing the appearance of regulatory compliance. Accepting them would not only fail UK consumers and developers, it would actively entrench Apple's anti-competitive position by providing regulatory cover for inaction.

Specifically, I urge the CMA to address the following critical failings:

1. Apple commits to sharing nothing. The proposal contains no obligation whatsoever for Apple to grant access to any API. Apple explicitly reserves the right to refuse any request in line with its "commercial strategy" — meaning it can and will deny access to any API that would allow a competitor to build a better product.
2. Apple may charge for API access. Apple's proposal allows it to charge fees for granting interoperability access. This would create a pay-to-compete model where third-party developers must pay Apple simply to access functionality that Apple's own apps use for free. API access must be provided free of charge.
3. Eligibility is arbitrarily restricted. Only developers registered in the UK Developer Program can make requests — excluding the vast majority of developers whose apps UK consumers use every day. Eligibility must extend to all developers and vendors providing apps, services, or connected devices to UK users, regardless of where their developer account is registered.
4. The rejection criteria are broad and ungameable. Criteria such as "alignment with Apple's platform priorities" and "expected user uptake" give Apple unlimited grounds for denial. These subjective criteria must be replaced with clear, objective, and independently reviewable standards.
5. There are no binding deadlines. Apple commits only to "endeavour" to respond within four weeks — a non-binding aspiration, not a requirement. Given that the EU was forced to launch specification proceedings against Apple precisely because of delay tactics, binding deadlines are non-negotiable.

6. There is no independent appeals process. Developers who are denied have no meaningful recourse. An independent and accessible appeals mechanism is essential for any genuine interoperability regime.

The EU's experience under the Digital Markets Act demonstrates that voluntary commitments from Apple do not deliver real outcomes. Enforceable, mandatory requirements do. The tangible gains UK consumers have already benefited from — USB-C charging, NFC payment access, cross-platform file sharing — came from binding EU obligations, not goodwill.

I strongly urge the CMA to impose a clear, enforceable interoperability obligation requiring Apple to provide, free of charge, access to all APIs and operating system features needed for third parties to interoperate with iOS — subject only to security measures that are strictly necessary, proportionate, and publicly justified by Apple. The burden of proof must rest with Apple, not with the developers seeking fair access.

Failing to act decisively here will harm UK startups, reduce consumer choice, and signal to the world's most powerful technology companies that voluntary compliance theatre is an acceptable substitute for genuine reform.

Respondent 23

My name is Ana and I am a web developer based in London. I have only recently heard about Apple’s proposed interoperability commitments so I haven’t had a lot of time to expand my thoughts on this.

I can share my personal experiences and how it affects me as an user:

I can only communicate or share files with my family and friends abroad using Apple’s approved apps. I can’t send an MMS to my mum via text message - a universal protocol - because she isn’t an Apple user. This forces us to use apps that likely violate our privacy if I want to share anything from my life with my family.
My friends assumed they installed their preferred choice of browser on their Apple phones. This isn’t the case on Apple devices and they feel deceived.

As a web developer, I can’t always use better and safer ways to implement some code because it is very likely that the Safari browser is not updated so users can’t enjoy those.

And finally, I don’t agree with the proposal of Apple investigating themselves either as it will be a deeply walled conversation with no real consequences and a lot of money to defend themselves.

Respondent 24

[redacted]

The majority of our customers interact with us through our website and app. About [redacted] of our customers come from iOS devices, [redacted] from Android devices, [redacted] from Windows and [redacted] from MacOS.

Our app is largely a container for our website. It doesn't make financial sense to build completely separate implementations in different technologies. Web browsers can be competitive with operating systems, so long as they're not held back.

We have an app and promote it in order to

1. Put a persistent icon on users' homescreens, making them more likely to use us as a primary destination when searching for holidays.
2. Send communications about the customer's booking and promotions in a more integrated manner than text messaging or email.
3. Have a listing in the app store's search engine.
4. Meet the expectations of users who have been taught that apps are the way to interact with phones.

All of these things should be true about our website, if the device manufacturer doesn't hold websites back.

I will focus on the issue of Apple using slow browser updates to hold the web platform back.

As a business built on top of the web platform, the more capable web browsers are, the better a product we can make, and the more competitive we can be. Very roughly speaking, browsers from the same era are on par with each other regarding standards like CSS and HTML features. A 2026 browser is roughly competitive with another 2026 browser, and a 2024 browser is more capable than a 2023 browser.

We track what HTML and CSS features we'd like to use to improve our website. We only then use the feature when the level of support amongst our customers is very high (99.5% at a minimum) or the fallback experience is acceptable.

In the year 2026, we're currently targeting browsers from early 2022, due to a large number of Safari users being on old versions. It is frustrating to know how much better

we could make our website if we could target newer browsers without cutting off large numbers of users.

Apple ties Safari updates to operating system updates which causes slow rollouts. Users are often reluctant to update their operating system, because it involves downtime, they may not like other changes associated with the update, they may not be confident running the update or their device may not have the free space available to do the update. Other platforms update their browsers using normal app update mechanisms which leads to very quick rollouts.

Apple blocks other rendering engines from iOS in the UK. This stops browsers like Chrome and Firefox from providing a newer rendering engine. It also stops us from bundling a newer rendering engine with our app to make our app more capable than can be done through the often outdated platform versions of WebKit.

We would like to see commitment from Apple to update WebKit (Safari's rendering engine) on iOS devices faster, as measured by the long tail of traffic to websites like ours. We want to see Google, Mozilla and other browser manufacturers unblocked from delivering their rendering engines to iOS devices in the UK. We want to use our choice of rendering engine on our iOS app.

Respondent 25

I am responding to your Call for evidence re: Proposed commitments from Apple and Google: app certainty and interoperable access

I'm concerned that the proposed remedies do not go far enough and rely on vague commitments on the part of Apple and Google to "greater transparency" in their processes rather than enforceable requirements. This seems to leave far too much discretion to Apple and Google, and it is very difficult for me to imagine how, in practice, this will result in any significant improvement in the current situation where Apple is able to restrict access to device functionality in a way that prevents third-party browsers from competing in any meaningful way with Safari on iOS.

As a web developer, I am specifically concerned by the issue of the lack of browser engine diversity on iOS. This is not a problem that only affects iOS users, since the inability of iOS users to switch to another browser means that the state of Safari creates a significant drag on the progress of the web more generally. Obviously, this has far-reaching economic implications and potentially affects (and creates real costs for) any business with a web presence.

For much of the late 2000s and early 2010s we were in a similar situation with Microsoft's Internet Explorer: an increasingly out-of-date browser that we nonetheless

were required to build around because of its ubiquity as the default browser in Windows. But in this situation it was at least possible for users to install an alternative browser. The present situation with Safari/WebKit on iOS is worse because there are no alternatives, and will not be until Apple is required to allow third-party apps the same access to device capabilities that WebKit has.

Given this, I do not understand why the Competition and Markets Authority, which has the power to impose legal requirements around interoperability, would settle for a proposed solution that seems (if I have understood it correctly) to amount to little more than promises to behave better, and which places a lot of the burden for ensuring this happens on individual developers. I would suggest that what is needed is not ways for developers "to request interoperable access" and "to raise complaints" - both of which place too much burden on individual developers and allow Apple too much discretion - but rather robust, enforceable requirements that prevent Apple from using their monopolistic position as an OS vendor and app store owner to unduly restrict web browsers from rival vendors on their platform in a way that is (and has been for years) damaging to the web industry as a whole.

I would note also that I believe the EU already has stricter requirements than those proposed here, and those have so far not proven very effective in getting Apple to allow competition on its mobile platforms. Given that, it's hard to see how the current proposal will produce any meaningful change.

Respondent 26

Dear CMA Digital Markets Team,

I am writing to submit a consumer perspective for your ongoing strategic market status investigation into Apple's mobile platform.

I wish to draw your attention to a specific practice that I believe falls squarely within your investigation's remit: Apple's iCloud storage model and what I would characterise as deliberate storage inflation.

Apple has not increased its free iCloud storage allowance (5GB) since 2011. In the same period, it has continuously engineered its iPhone cameras to produce significantly larger files — through higher resolution, ProRAW formats, 4K video, Live Photos, and Portrait mode — multiplying the storage footprint of ordinary consumer usage several times over. The effect is that consumers who purchased an iPhone in good faith find themselves unable to use it as intended without subscribing to a paid iCloud plan.

This dynamic is reinforced by Apple's control over iOS, which makes it structurally difficult for competing cloud providers to offer a comparable, friction-free alternative.

Apple therefore both creates the storage problem and controls access to the most convenient solution. In practical terms, consumers face a choice between paying Apple's ongoing fees or accepting a significantly degraded experience on hardware they have already paid for.

I would characterise this as:

1. Storage inflation — deliberately increasing file sizes produced by Apple hardware while freezing the free storage threshold, engineering dependency on paid iCloud subscriptions.

2. Foreclosure of competition — using iOS integration advantages to make third-party storage providers structurally uncompetitive, even where they offer comparable or better value.

3. A form of planned obsolescence — the device as purchased progressively fails to function as advertised without additional recurring payments engineered by the manufacturer.

I understand your current investigation is focused on app distribution, browser engines, and interoperability. I would respectfully urge the CMA to consider whether iCloud storage practices — and the specific mechanism of file size inflation alongside static free storage limits — should be incorporated into your programme of work on Apple's mobile platform.

I am happy to provide further information if it would assist your investigation.

Respondent 27

A UK startup developer reported difficulties launching a new subscription-based mobile application due to Apple’s App Store payment rules. The application provides digital services through a subscription model. During the App Review process, Apple indicated that subscriptions available through the app must also be offered using Apple’s In-App Purchase system in order for the app to be approved for distribution on the App Store.

For an early-stage startup preparing to launch a new service, this requirement can create additional technical and commercial challenges. In practice, offering subscriptions through Apple’s In-App Purchase system typically involves sharing a portion of subscription revenue with the platform operator and adapting the application’s payment architecture to comply with the platform rules. This process can

also delay the planned launch of new services while developers adjust their implementation.

Respondent 28

Dear Competition and Markets Authority,

Please keep your guidelines in line with the EU DMA, as currently American owned Technology firms are controlling all aspects of technology in ways that are costly for UK consumers and businesses. Creating better inter-operability between computing devices would improve competition and allow small and medium business to be able to compete and thrive

Respondent 29

Hello, I applaud the CMA for taking up the task of trying to bring greater interoperability to the mobile ecosystem. But I implore you to make sure that the agreements have teeth. In order to truly foster interoperability and a better, more favourable competitive landscape for UK businesses, it's imperative that Apple's ban on third-party app stores and its restriction that no third-party browser may properly be deployed on iOS be nullified.