

# Competition and Markets Authority's Consultation on Apple's voluntary commitments on App certainty and interoperable access

## Response from Mobile UK

March 2026

### About Mobile UK

1. Mobile UK is the trade association for the UK's Mobile Network Operators ("MNOs") – BT/EE, Virgin Media O2, and VodafoneThree. Our goal is to realise the power of mobile to improve the lives of our customers and the prosperity of the UK.
2. As mobile increasingly becomes the device of choice for running daily life both at home and at work, customers want improved coverage and greater capacity. Mobile UK's role is to identify the barriers to progress and work with all relevant parties to bring about change, including Government, regulators, industry, consumers, and the wider public.

### General comments about Apple's commitments

3. Mobile UK welcomes the opportunity to respond to the Competition and Markets Authority's ("CMA") consultation on the proposed voluntary commitments from Apple in relation to its mobile platform.
4. The proposed commitments are welcome and represent meaningful progress. The CMA, though, will recognise they fall some way short of the sort of measures that could be brought in by the CMA using conduct requirements or by Ofcom, for telecoms providers designated with Significant Market Power ("SMP") in a relevant telecoms market (more or less equivalent to Strategic Market Status in the current context).
5. Measures imposed on SMP providers, at a minimum, require that their services are offered to commercial partners on fair, reasonable and non-discriminatory terms. By contrast, Apple proposes that its App Review guidelines and App Store Search processes will be fair, objective and transparent. While these commitments offer some assurance about how Apple will act and how its processes will operate, they do not guarantee equal treatment of all parties in the way that a non-discrimination requirement does – and the proposed interoperability commitment contains no provision as to fairness or objectivity.
6. Mobile UK has also compared the proposed commitments to the requirements that are imposed on gatekeepers under the EU Digital Markets Act. Some aspects of the DMA

appear more clearly defined and likely to give partners more confidence that requests will be carried out in a timely, transparent and objective manner. For example:

- a. The proposed commitments place less pressure on Apple to deal with interoperability requests in a **timely manner** than under the EU Digital Markets Act. The interoperability team will merely “endeavour” to respond to requests within four weeks. In the EU<sup>1</sup>, the process specification decision imposes measures to ensure that Apple puts in place a structured process for interoperability requests, with increased transparency, and within stricter deadlines.
  - b. Apple’s commitment to providing reasoning for rejecting any particular application is very open and vague. Mobile UK would like to see more clarification and reasoning behind any particular decision, more in line with the process in Europe.
  - c. The appeal mechanism in the commitments appears unclear – under the DMA, if a developer is not satisfied with an outcome of the process, they have access to a conciliator’s panel.
7. The proposed commitments may therefore create greater uncertainty for commercial partners as to Apple’s future behaviour than if bound by SMP measures or conduct requirements.
8. However, Mobile UK recognises that the acceptance of undertakings is a pragmatic step that may help accelerate progress. Nonetheless, greater clarity from the CMA on how and when it would intervene if the voluntary measures proved ineffective would offer considerable reassurance.

## Interoperability

9. Mobile UK’s members are primarily interested in Apple’s commitment to create a formal process for third-party interoperability requests.
10. In previous submissions to the CMA<sup>2</sup>, Mobile UK has made the point (and the CMA has agreed<sup>3</sup>) that the connectivity portion of mobile platforms is a key part of the overall

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<sup>1</sup> <https://competition-cases.ec.europa.eu/cases/DMA.100204>

<sup>2</sup> See Mobile UK’s response to the CMA’s Invitation to Comment (February 2025) and Mobile UK’s response to the consultation on the CMA’s proposed designation decision (August 2025).

<sup>3</sup> Paragraph 1.7 of the CMA’s proposed designation decision.

competitive landscape; it is a critical component of how consumers use mobile devices and is a driver of innovation, resilience and growth.

11. Mobile UK considers that it is essential that the interoperability commitment covers matters relating to mobile connectivity. For the interoperability framework to function effectively, it must cater for the different types of interactions that occur across the mobile ecosystem, including those relevant to app developers, device manufacturers and mobile network operators. Ensuring that the interface between an operator’s connectivity services and the functionality managed directly by Apple within the device and the OS work effectively is necessary for delivering consistent device performance for consumers, supporting efficient spectrum use, and maintaining the high standards of network reliability expected in the UK.
12. Given this, Mobile UK considers it important that the new interoperability route is designed to sit coherently alongside the processes already used to coordinate connectivity-related functionality. Greater visibility on how the new framework will interact with existing technical processes would support a smooth transition and give stakeholders confidence that early requests can be handled constructively.
13. Therefore, Mobile UK requests that paragraph 1(b) of the interoperability commitment explicitly acknowledges that interoperability requests relating to connectivity made by Eligible Developers can be processed through the feedback channel or through existing channels, by adding the words in italics below:

*“The feedback channel will be available to developers that are members in good standing of the Developer Program and whose account membership with the Developer Program is registered in the UK (“**Eligible Developers**”). For the avoidance of doubt, interoperability requests made by Eligible Developers relating to connectivity **can be processed through this channel or with flags via existing channels, at the Eligible Developer’s election.**”*

### Transparency

14. Mobile UK welcomes Apple’s commitment to provide annual public reporting on interoperability requests. Over time, information on the volume and themes of requests, and on how they are handled, will help build confidence in the effectiveness of the overall framework.
15. We also recognise that the CMA will receive more regular and detailed information through Apple’s confidential reporting commitments. Mobile UK would welcome further clarity on whether the CMA intends to share periodic high-level insights or emerging themes, drawing on this confidential information, as the regime is established. Early, high-

level feedback from the regulator would help stakeholders understand how implementation is progressing in the initial stages.