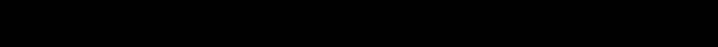


Dear CMA Mobile SMS Team,

I am responding to your call for evidence on Apple's proposed app certainty commitments.

 whose Apple Developer account was terminated. I want to share what happened to us, because I believe it illustrates exactly the problem your investigation should address.

I spent over three months building an app, investing everything I had into it. Apple's review team approved it and published it on the App Store. Within 24 hours, it had over 150 downloads and more than \$200 in revenue. Users wanted it. It was a legitimate, working product.

Then Apple terminated our entire developer account — less than a day after approving the app themselves. The termination notice cited Section 3.2(f) DPLA and Guideline 5.6.2, but gave no specific explanation. No detail about what we did wrong. No evidence. Just vague, templated language that I still cannot decipher to this day.

Think about what that means: Apple reviewed the app, approved it, collected their commission on sales, and then terminated the developer. All in under 24 hours. No warning. No chance to fix anything. No explanation.

Apple's own data shows this is systemic — 147,000 accounts terminated in 2024, only 225 reinstated. That is a 0.15% appeal success rate.

For your proposed commitments to mean anything, they need to cover how Apple treats developers at the account level, not just how they review individual apps. At minimum:

- Specific, evidence-based reasons for termination — not generic legal boilerplate
- Graduated enforcement before the nuclear option (warnings, suspension, chance to fix)

- A genuine independent appeal route for UK developers
- Consistency — if Apple approves an app, that approval should mean something

[REDACTED]