

Strategic Market Status Investigation into Microsoft's Business Software Ecosystem


Response from the Browser Choice Alliance to the CMA's Invitation to Comment

"Microsoft's strategy of resetting browser defaults to Edge and ignoring user choice in key apps in its must-have productivity suite actively restricts business choice and creates a productivity drain for SMEs. When operating systems override the specialised tools, like Wavebox, that businesses deliberately choose and pay to use, they aren't just pushing a browser, they are imposing a direct operational cost and lost time on small businesses trying to work efficiently."

"Opera has been pioneering browser technologies for 30 years and as alternative browser provider we rely on free and fair competition to continue to innovate and deliver ground breaking technologies to our users. While we focus on competing for the heart of the consumer, Microsoft chooses to continuously and deliberately undermine our possibility to do so and grow on desktop, as it implements patterns that unfairly confuse and frustrate our customers with the aim of steering them away. This unacceptable behaviour not only creates an uneven playing field and effectively restricts competition for alternative browser brands, but moreover harms the entire value chain including developers, distributors and users."

"Waterfox is an independent, UK built browser, and the issue isn't that small businesses reject us - it's that they never really get the chance to consider us. A typical small firm buys Windows devices and a Microsoft 365 subscription, with no dedicated IT to change defaults; Edge arrives as the only browser on the device and stays on as default not by merit but thanks to steering practices which discourage rival downloads and switching. And even if a user does switch defaults, Windows itself continues to route certain system links, search and widget content to Edge regardless of the browser the user actually chose. Independent browsers can't be preinstalled and set as the default at provisioning on any devices, can't be rolled out through the lightweight tooling these firms rely on, and anyone who does switch gets quietly and repeatedly nudged back, so we're shut out of the most valuable user base before we can compete on what we're good at (privacy, speed, and not bolting an AI assistant onto every click). Microsoft has already fixed some - but far from all - of the default issues for the EEA under the DMA. But UK businesses get none of those even partial protections, because the DMA isn't enforceable here, which leaves them on the more heavily-steered version of Windows and browsers like ours on the outside of it."

“Microsoft is clearly deliberately trying to force users back to Edge, who then blame us and are less likely to keep using our browser for work and professional reasons. We are glad to see the CMA picking up on these issues, since we are not able to fight back against Microsoft’s massive market power in OS and productivity where Microsoft sets the rules of the game.”



I. Introduction and Executive Summary

The Browser Choice Alliance (“**BCA**”) is a coalition of web browser providers dedicated to promoting genuine competition and choice in PC browsers for the benefit of consumers and developers alike.¹ BCA members include large and small browser developers, including UK developers such as Wavebox (Wales-based developer of the Wavebox browser) and BrowserWorks (London-based developer of the Waterfox browser).

The BCA and its members welcome the present investigation by the Competition and Markets Authority (“**CMA**”) under the Digital Markets, Competition and Consumers Act 2024 (“**DMCCA**”) into Microsoft. The BCA believes that this investigation is an important first step towards ensuring free and fair competition within Microsoft’s business software ecosystem, including between browsers, which are the key gateway for PC users to access the internet and web-based services.

The BCA believes that Microsoft has strategic market status (“**SMS**”) in its business software ecosystem, including at least the Windows PC operating system (“**OS**”) and its productivity software suite known as Microsoft 365, M365 or Office 365.

Microsoft leverages that market power to hinder merit-based competition, user choice and innovation in the UK. Instead of competing on features and innovation, Microsoft relies on portfolio-wide distribution channel exclusivity and various anti-competitive steering practices to force the use of its own browser and thus undermine effective choice.

Denying users the ability freely to choose their preferred browser, and to have that choice respected, harms productivity and growth in the UK, particularly in the nascent UK browser industry. Microsoft’s practices also directly interfere with the user experience. In addition, Microsoft’s practices hamper competition and impede innovation in the PC browser market harming developers, including those based in the UK.

The member testimonies on the first pages of this submission encapsulate Microsoft’s anti-choice practices and the harms that they create.

In the remainder of this response to the invitation to comment (“**ITC**”), the BCA makes the following key points:

- On the **scope** of the **SMS investigation (Section II)**
 - The BCA agrees with the CMA’s proposed definition of “organisations” as set out at footnote 1 of the ITC, which essentially captures all professional use and is agnostic to how Windows devices and licences are acquired. In this context, it is important for the CMA to include the retail channel, i.e., both high street and online retailers, in scope in addition to specialist business-to-business (“**B2B**”) channels (**Section II.A**). That is because, as confirmed by survey evidence, millions of small businesses will purchase their Windows devices through these

¹ Launched in November 2024, the BCA is an open and growing alliance whose members already include BrowserWorks, Google Chrome, Midori, Opera, Vivaldi and Wavebox. Any browser provider is free to join provided that they commit to the alliance’s core principles. See further <https://browserchoicealliance.org/>.

retail channels. These devices will comply with Microsoft restrictive Jumpstart program that results in *de facto* exclusive preinstallation of Edge.

- Microsoft has SMS status in its business software ecosystem, including at least its ubiquitous Windows PC OS and its must-have M365 Productivity Software Suite (**Section II.B**). Windows and M365 are archetypal SMS products, holding very high market shares for a matter of decades, which Microsoft leverages to distort competition in adjacent markets (such as browsers).
- The BCA urges the CMA not to make artificial and binary distinctions as to “consumers” vs. “organisations”. The BCA believes that in the context of Microsoft’s business software ecosystem there is no clear-cut distinction between professional and personal use, with devices often being used for both. Artificially, scoping out “consumers” from any eventual remedial measures would reduce their effectiveness and hinder the realisation of a level playing field for developers (**Section II.C**).
- On **Microsoft’s anticompetitive leveraging** that harms rival browsers with detrimental effects in the Microsoft business software ecosystem (**Section III**)
 - PC browsers are business software and play a key role in Microsoft’s business software ecosystem. PC browser developers offer differentiated products and user experiences that offer different benefits to UK organisations, and PC browsers are a key source of competition within Microsoft’s business software ecosystem (**Section III.A**).
 - Microsoft’s anticompetitive leveraging practices harm user experience and business productivity in the UK. Microsoft economically coerces major PC OEMs to set Edge as the exclusive preinstalled browser across their entire portfolio through “all or nothing” portfolio-wide discounts on the price of a must-have Windows licence. Microsoft thus freezes out smaller rivals from even a small slice of distribution opportunities. Having secured for itself this distribution channel exclusivity, Microsoft employs various steering practices to force the use of its own browser and thus undermine effective choice (**Section III.B**).
 - Addressing Microsoft’s harmful browser choice practices through the avenues identified in the ITC would be effective, proportionate and have clear benefits to users (**Section III.C**).
- The BCA finally offers some brief concluding remarks (**Section IV**).

II. Scope of the SMS investigation and SMS assessment

A. The BCA supports the ITC’s definition of “organisations” and the identification of Microsoft products

The BCA agrees with the broad and non-exhaustive definition of “organisation” used by the ITC and the Investigation Notice (or “**Notice**”) to include businesses, charities, educational institutions and public sector entities, without any limitation as to size.² In essence, the CMA’s definition of “organisation” captures all uses of the Microsoft business software ecosystem for work.³

According to DBT data,⁴ over four million UK private sector businesses have no employees, and more than one million businesses have fewer than ten employees. These micro businesses represent (i) over 95% of UK private sector businesses,⁵ and (ii) when aggregated with “charities”, “educational institutions” and “public sector entities”, represent the vast majority (91%) of UK “organisations” potentially in-scope of the CMA’s investigation.⁶ Moreover, when aggregated with small businesses (10-49 employees) and medium businesses (50-249 employees) (i.e., *all* SMEs of 0-249 employees), this population would represent 99% of UK private sector businesses.⁷ The BCA therefore welcomes that the ITC covers Microsoft’s practices that restrict the choices of these organisations and their end-users. Indeed, this scoping is essential to ensure that the coverage of Microsoft’s business software is properly reflected, and that any consequential interventions are effective.

² CMA, “Strategic Market Status Investigation into Microsoft’s business software ecosystem: Invitation to Comment”, 14 May 2026, available at: https://connect.cma.gov.uk/consultations/microsoft-business-software-itc/supporting_documents/invitation-to-commentpdf, fn. 1: “*Organisation includes, but it is not limited to, businesses, charities and public sector entities*”. See also CMA, Notice under Section 11(1) of the Digital Markets, Competition and Consumers Act 2024 (“Investigation Notice”), available at: https://assets.publishing.service.gov.uk/media/6a044eeecd2e0e8b5b20b518/Investigation_Notice.pdf, (fn.1).

³ ITC, para. 2.

⁴ Department for Business and Trade, UK Government, “Business population estimates for the UK and regions 2025: statistical release”, 2 October 2025, available at: <https://www.gov.uk/government/statistics/business-population-estimates-2025/business-population-estimates-for-the-uk-and-regions-2025-statistical-release>.

⁵ There are 4.273m non-employers and 1.151m micro employers out of a total private sector business population of 5.690m.

⁶ In the UK there are [170,503](#) registered charities; [32,149](#) schools; [266](#) higher education providers; there are [11,475](#) public sector enterprises in England (while this figure excludes Scotland, Wales and Northern Ireland that is unlikely to materially affect the conclusion). Combined with the total private sector business population of 5.690m that represents a total “organisation” figure of 5.904m. (Sources: see: (i) <https://www.gov.uk/government/publications/charity-commission-casework-and-registrations-data-2024-to-2025/casework-and-registrations-data-july-to-september-2024>; (ii) <https://www.besa.org.uk/insights/education-statistics/> and (iii) https://lginform.local.gov.uk/reports/lgastandard?mod-area=E92000001&mod-group=AllRegions_England&mod-metric=5490&mod-type=namedComparisonGroup).

⁷ There are 5.682m “All SME (0-249 employees)” in the UK out of an “all private sector” business population of 5.690m. See Department for Business and Trade, UK Government, “Business population estimates for the UK and regions 2025: statistical release”, 2 October 2025, available at: <https://www.gov.uk/government/statistics/business-population-estimates-2025/business-population-estimates-for-the-uk-and-regions-2025-statistical-release>.

The extremely large number of smaller businesses falling within the ITC's definition of "organisations" is directly relevant to browser choice. This is because smaller businesses tend to interact with Microsoft's products and services in ways that differ materially from larger organisations, in at least three respects:

- *First*, people working in small businesses often purchase Windows PCs through ordinary retail channels rather than specialist B2B channels. This is confirmed by a survey of small and medium sized enterprises ("SMEs", i.e., those with fewer than 250 employees) carried out on behalf of the BCA in May 2026.⁸ According to this survey,
 - Two thirds of SMEs surveyed stated that they typically purchase devices through retail channels.⁹ And in the majority of cases, SMEs purchase their business computer devices themselves.¹⁰
 - For businesses surveyed with 1-24 employees, **84% bought computers either through retail channels or directly from the manufacturer** – this likely represents millions of UK businesses.
- *Second*, people working in small businesses often purchase non-enterprise Microsoft licences that are available through retailers, such as Windows Home and Windows Pro. We are not aware of there being restrictions on the use of these licences for professional purposes and Microsoft even markets these licences as being appropriate for professional use.¹¹ A freelancer or sole trader using Windows 11 Home or Pro licence is using "business software" no less than a large organisation deploying Windows enterprise licences. That organisations use devices with these non-enterprise licences is confirmed by the BCA survey:
 - 30% of SMEs surveyed stated that they use a Windows Home licence, with a further 48% using Windows Pro.¹²
 - By contrast, just 18% of SMEs surveyed stated that they use a Windows Enterprise licence.¹³
 - For businesses surveyed with 1-24 employees, 37% stated that they use Windows Home and 41% stated that they use Windows Pro – this likely represents millions of UK businesses.

⁸ See Browser Choice Alliance, UK online survey, 19-22 May 2026, provided as **Appendix 1**.

⁹ Comprising purchases from physical or online retail stores (such as Curry's or Amazon), including a retailer's business purchasing programs, or purchases directly from the manufacturer itself.

¹⁰ See **Appendix 1**.

¹¹ See, e.g., Microsoft Business website, available at: <https://www.microsoft.com/en-gb/windows/business/windows-11-pro#Systemrequirements>: "Speed workflows with intelligent business-ready Windows 11 Pro PCs" and "Windows 11 Pro combines performance, security and manageability to help businesses stay productive and protected. It offers enhanced security, AI capabilities, optimised workflows, accelerated performance and device management tools."

¹² See **Appendix 1**.

¹³ Ibid.

- *Third*, these small businesses experience Windows PCs in an “unmanaged” environment. Small businesses are unlikely to use tools such as Microsoft Intune or Active Directory. This means they generally cannot centrally control and configure the settings on Windows PCs across their organisation, such as remotely deploying additional browsers or changing default settings at an organisation-wide level. Indeed, less than a quarter of SMEs surveyed have access to an internal IT specialist or department that is responsible for the management of devices (as well as their purchase).¹⁴

As a result, the vast majority of UK organisations will likely not have a specialist B2B wholesaler configure the device before shipping nor dedicated IT departments that will do so pre-deployment to the workforce. That means that millions of UK organisations (and thus their multi-million employee base) likely deploy an “unmanaged” out-of-the-box experience for Windows PCs configured by the OEM in accordance with Microsoft’s restrictive Jumpstart programme, as a result of which Edge is the exclusively preinstalled default browser (see further section [III\(B\)\(1\)](#) below). Moreover, even users within larger organisations with dedicated IT departments and managed group policies still face persistent anti-competitive practices where Microsoft attempts to leverage its Windows OS dominance to steer users away from their preferred services and instead to Edge and Microsoft’s productivity tools and other services, including away from Copilot AI competitors (see further section [III\(B\)\(2\)](#) below).

From a broader enforcement perspective, including these Windows PC environments – which correspond to millions of devices in use in the UK – within scope will help ensure a level playing field for developers, including but not limited to browser developers.

B. Microsoft has SMS in respect of the supply of each of (at least) PC OS and Productivity Software Suites

The BCA welcomes that the proposed investigation will cover the provision of PC OSs and Productivity Software Suites – two central pillars in the Microsoft business software ecosystem, where Microsoft certainly has substantial and entrenched market power and a position of strategic significance, and through which Microsoft distorts competition in the PC browsers market. The BCA’s submission focuses on these activities within the Microsoft business software ecosystem, consistent with the harmful Microsoft practices that the BCA has observed.

1. Microsoft’s supply of PC OS satisfies the SMS conditions

The scale of Windows within organisations and beyond is difficult to overstate. Windows has held a dominant position in PC OSs “*since at least 1996*”¹⁵ and maintains a share well above the threshold for dominance to this day, with no indication that this will change in the foreseeable future. In January 2026, Microsoft CEO Satya Nadella publicly

¹⁴ See **Appendix 1**.

¹⁵ Case COMP/C-3/37.792 *Microsoft (Windows Media Player)*, European Commission decision of 24 March 2003, para. 472.

stated Microsoft had “*share gains this quarter across Windows*”.¹⁶ And in April 2026, Mr Nadella confirmed that there are over 1.6 billion monthly active Windows devices worldwide (an increase of 200m users from 2022).¹⁷ Consistent with this, the CMA recently found that Microsoft holds a “*significant degree of market power*” in respect of its Windows 10/11 OS software, taking into account its “*very large share of the desktop OS market*” ([90%-100%] in 2023).¹⁸

All major PC OEMs, such as Lenovo, HP, Dell, Asus, and Acer, must ship Windows devices and rely on Windows device revenue for significant portions of their overall revenue (borne out by ChromeOS’s and Linux’s UK share of PCs of just approximately 3% each). And the only material new OS entrant in the past several decades has been ChromeOS, which launched in 2011. In other words, large-scale PC OS entry has not happened for decades and is not a realistic prospect in the foreseeable future.

Likewise, browser developers must design their products to specifically run and operate on the Windows OS. Otherwise, they would be cutting themselves off from the near totality of the global market for PC OSs that Windows represents.

This would be catastrophic for browsers, given that PCs – and therefore Windows – remain a critical gateway for users to access the web and digital-based products and services, especially across many important educational and enterprise use cases. For example, 78% of enterprise users use desktops for more than five hours per day.¹⁹ Moreover, enterprise users use desktop devices overwhelmingly for certain tasks like presentations (around three quarters of enterprise users) and general office admin tools (around two thirds of enterprise users). And enterprise use of desktop PCs for email/messaging, as well as finance and accounting, far outweighs the same use cases on smartphones. The same dynamic applies to the education sector, where 96% of students use PCs (i.e., desktops or laptops) as their primary device for academic needs, underscoring the central role that PCs play within educational institutions.²⁰

¹⁶ See Microsoft Q2 FY26 Earnings Conference Call, 28 January 2026, available at: <https://www.microsoft.com/en-us/investor/events/fy-2026/earnings-fy-2026-q2>.

¹⁷ See Microsoft Q3 FY26 Earnings Conference Call, 29 April 2026, available at: <https://www.microsoft.com/en-us/investor/events/fy-2026/earnings-fy-2026-q3> and Microsoft Q2 FY22 Earnings Call Transcript, 25 January 2022, available at: <https://view.officeapps.live.com/op/view.aspx?src=https://cdn-dynmedia-1.microsoft.com/is/content/microsoftcorp/TranscriptFY22Q2> (“*There are now more than 1.4 billion monthly active devices running Windows 10 or Windows 11*” – see <https://view.officeapps.live.com/op/view.aspx?src=https://cdn-dynmedia-1.microsoft.com/is/content/microsoftcorp/TranscriptFY22Q2>).

¹⁸ CMA, Cloud Infrastructure Services, Final Decision Report, 31 July 2025, available at: https://assets.publishing.service.gov.uk/media/688b8891fdde2b8f73469544/final_decision_report.pdf. See para. 7.173.

¹⁹ See Computer & Communications Industry Association (“**CCIA**”), “The AI-Driven Future Is Now, And It’s Desktop-Enabled”, 22 October 2024, available at: <https://ccianet.org/research/reports/ai-driven-future-now-desktop-enabled/>.

²⁰ See, for example, EDUCAUSE Review, “The Evolving Landscape of Students’ Mobile Learning Practices in Higher Education”, 25 January 2023, available at: <https://er.educause.edu/articles/2023/1/the-evolving-landscape-of-students-mobile-learning-practices-in-higher-education>. (“*For academic needs, 76 percent of students reported using laptops as their primary device; 18 percent reported using desktops primarily* [i.e., 96% across both laptop and desktops]”).

The importance of Windows PCs is only increasing in the age of generative AI.²¹ Key generative AI use cases include productivity, deep research and coding.²² These tasks are all especially well-suited to being carried out on PCs. For example, PCs rate higher than smartphones for enterprise users when it comes to higher-value AI activities such as automated coding/software development, advanced process automation and employee productivity tools.²³ And more generally, PCs are already a “clear first” amongst heavy users of AI (i.e., those spending 5+ hours a day using AI applications).²⁴ The same survey found that 74% of enterprise users said that their desktop usage would increase in the coming year due to AI.²⁵ Therefore, a consideration of the future deployment of AI products into organisations indicates that PCs and – in turn – Windows OS are likely to only increase in importance.

Industry participants have recognised this trend. Major Windows PCs OEMs are committed to building and shipping AI-enabled PCs. For example, in March 2026, HP confirmed that AI PCs constituted 44% of shipments up from 35% in the previous quarter.²⁶ HP expects AI PCs shipment to rise to 60% and 70% in the next fiscal year and exceed 70% by fiscal year 2028. Microsoft itself is leading the development of AI-powered PCs, announcing the launch of a new class of Copilot+ Windows PCs designed for AI in 2024.²⁷ And only a matter of days ago, Microsoft and NVIDIA announced a partnership to “*reinvent Windows PCs for the era of*

²¹ The Microsoft earnings report highlights a monumental commitment to artificial intelligence, with the company forecasting \$190 billion in capital expenditures for the 2026 calendar year, see “Microsoft Q3 FY26 Earnings Call”, available at: <https://www.microsoft.com/en-us/investor/events/fy-2026/earnings-fy-2026-q3>, (“For calendar year 2026, we expect to invest roughly \$190 billion in capital expenditures”).

²² See, e.g., Medium, “My Experience Coding with GenAI: Why it Should Encourage You, Not Scare You”, 29 April 2025, available at: <https://medium.com/sopra-steria-norge/my-experience-coding-with-genai-why-it-should-encourage-you-not-scare-you-6d6b7de8c70d> (“GenAI allowed me to output in three days the same work as a couple of below-average developers would have given me after a couple of weeks [...] GenAI is eliminating the need to “code” the boring stuff, the chunks of code that have been written a thousand times before, and that you probably copy/paste from other projects.”); CCIA, “The AI-Driven Future Is Now, and It’s Desktop-Enabled”, 22 October 2024, available at: <https://ccianet.org/research/reports/ai-driven-future-now-desktop-enabled>. (“Omdia data from a recent GenAI Early Adopters Survey shows that Employee productivity tools are one of the most widely implemented GenAI use cases to date, across a wide range of industry verticals”); and AnswerRocket, “Deep Research: What It Is, How It Works, and Why It Matters”, 8 August 2025, available at: <https://answerrocket.com/deep-research-what-it-is-how-it-works-and-why-it-matters/> (which refers to four key use cases for deep research where it can it can “drive continuous monitoring, strategic insight, and proactive decision-making”: always on business monitoring, strategy and planning, knowledge heavy investigations across domains like pharma, law and engineering, and enhanced enterprise search).

²³ See CCIA, “The AI-Driven Future Is Now, And It’s Desktop-Enabled”, 22 October 2024, available at: <https://ccianet.org/research/reports/ai-driven-future-now-desktop-enabled/>.

²⁴ Ibid.

²⁵ Ibid, p. 14.

²⁶ Reuters, “HP tops revenue, profit estimates as AI PC and Windows 11 refresh boost demand”, 27 May 2026, available at: <https://www.reuters.com/world/china/hp-beats-revenue-profit-estimates-ai-pc-windows-11-refresh-boost-demand-2026-05-27>.

²⁷ Microsoft, “Introducing Copilot + PCs”, 20 May 2024, available at: <https://blogs.microsoft.com/blog/2024/05/20/introducing-copilot-pcs/>.

personal AI agents".²⁸ Specifically, NVIDIA is working with Microsoft and major Windows OEMs (Dell, Asus, HP and Lenovo) to build Windows laptops designed for running AI agents using NVIDIA superchips. Consistent with the above, IDC expects 93.9% of commercial PC shipments to be AI PCs by 2028.²⁹ The same IDC report found that 83% of surveyed companies expect AI PCs to eliminate repetitive tasks and 76% to drive increased productivity. These ongoing and expected developments in AI mean that Windows PCs are – and will be – more relevant than ever.

As a result of Windows' substantial and entrenched market power, Microsoft controls the choice architecture on the devices of the 15-25 million organisational end-users of Windows OS.³⁰ Through its agreements with OEMs, steering practices, and other techniques, Microsoft subverts user choice, leveraging its control over Windows to preference its own browser – Edge. Microsoft's ability to successfully leverage its substantial and entrenched market power³¹ from PC OSs into browsers exemplifies the former's SMS status.

The CMA is right to focus on Windows 11 as Microsoft's "main operating system in the UK". In October 2025, Microsoft ended support for Windows 10. Organisations and their users are therefore migrating to Windows 11 – a one-way and irreversible upgrade that is incentivised by the deprecation of support for Windows 10. In addition, reportedly, last year nearly 80% of businesses were planning to update their PC supplies by the end of the year, and 70% of consumers will have bought a new PC by 2027.³² These developments will inevitably drive usage of Windows 11 over Windows 10. Furthermore, Microsoft's deceptive anti-choice practices are most intense on Windows 11, and it is also where Edge's share is highest (likely over 40% – see further section [III\(B\)\(3\)](#) below).

2. Microsoft's supply of Productivity Software Suites satisfies the SMS conditions

The BCA broadly agrees with the functional definition of Productivity Software Suite used by the CMA in the ITC as "*a productivity software suite that enables users to work and collaborate in an organisation, including to create, record, communicate and manage information*". The BCA also agrees that the "*main [Microsoft] apps*" concerned are Outlook for email, Word, Excel, PowerPoint, OneDrive, SharePoint and Teams. The BCA supports the CMA's scrutiny of Copilot as there is growing evidence that Microsoft anti-competitive browser tactics are being extended to GenAI chatbots.³³

²⁸ Newsroom, "NVIDIA and Microsoft Reinvent Windows PCs for the Age of Personal AI", 31 May 2026, available at: <https://nvidianews.nvidia.com/news/nvidia-microsoft-windows-pcs-agents-rtx-spark>

²⁹ AMD, "The Rise of AI PCs in the Commercial Market: Planning for the Future", 14 March 2025, available at: <https://www.amd.com/en/blogs/2025/the-rise-of-ai-pcs-in-the-commercial-market-plann.html>.

³⁰ ITC, fn. 2.

³¹ A concern set out in the ITC, at fn. 2 above, including in paras. 38, 41 (a) and (c), and 52-54.

³² Axios, "Microsoft plots a course for Year 2 of the AI PC", 6 January 2025, available at: <https://www.axios.com/2025/01/06/microsoft-ai-pc-recall-2025>.

³³ ITC, para. 15(a).

Across all measures the CMA considered in the recent Cloud services market investigation, Microsoft held an 80-90% global share for productivity suites.³⁴ In finding that Microsoft has a “significant degree of market power in relation to its productivity suites”, the CMA took into account not only this “very high and stable market share”, but also the alongside “limited competitive alternatives” available, and evidence that customers are “unwilling or unable to switch away” in response to a SSNIP.³⁵

The extent of Microsoft’s dominance across both PC OS and productivity software is even recognised by a Microsoft-commissioned report from Forrester Research that found “Windows PCs for business with Microsoft Office (including Microsoft 365) remain the dominant operating system and productivity suite combination across the globe.”³⁶

Microsoft’s substantial and entrenched market power in its Productivity Software Suite has also been confirmed by other competition authorities.³⁷

C. The BCA urges the CMA not to make artificial and binary distinctions as to ‘consumers’

While the BCA welcomes the ITC’s broad scope for “organisations”, it also notes that Microsoft’s anticompetitive browser choices practices affect both business and consumer use cases alike.

The practical reality is that consumer and business use cases frequently overlap, making it difficult to draw a sharp distinction between them. There is often no clear-cut boundary between personal/work devices and personal/work use. A given Windows device may be used for both personal and professional activities. Common examples include: using a personal computer for tax/accounts, accessing work emails and other through web apps and virtual desktops. This mixing of professional and personal is amplified by “bring your own device” (“BYOD”) policies, which are widespread in the UK. Indeed, reportedly more than half of UK businesses allow employees to use personal devices including laptops for work in 2026.³⁸ Microsoft’s own Windows Pro marketing describes the product as designed for “the

³⁴ CMA, “Cloud Infrastructure Services, Final Decision Report”, 31 July 2025, available at: https://assets.publishing.service.gov.uk/media/688b8891fdde2b8f73469544/final_decision_report.pdf. See para. 7.182.

³⁵ CMA, para. 7.190.

³⁶ Forrester Research, “The Total Economic Impact Of Microsoft Windows PCs For Business”, September 2021, available at: <https://www.microsoft.com/content/dam/microsoft/final/en-us/microsoft-brand/documents/MSFT-TEI-of-Microsoft-Windows-PCs-For-Business-RE4VoQF.pdf>.

³⁷ Microsoft’s dominance in productivity software is longstanding and entrenched, and has been confirmed by other competition authorities in addition to the CMA. In 2024, the German Federal Cartel Office (“FCO”) held that Microsoft has “at least a very strong market position” in the productivity software market (FCO Decision B 6 – 26/23, para. 258). That is consistent with the European Commission’s 2025 finding that Microsoft’s SaaS productivity applications hold a 70%-80% worldwide share (see European Commission decision of 12 September 2025, CASES AT.40721 – MICROSOFT TEAMS and AT.40873 – MICROSOFT TEAMS II, para. 88 (calculated in market for SaaS Productivity Applications for professional use)).

³⁸ Connection Technologies, “BYOD Policy UK: How to Manage Employee Devices Securely in 2026”, 7 March 2026, available at: <https://connection-technologies.co.uk/blog/byod-policy-uk-business-guide>.

world of hybrid work”, implicitly acknowledging the same Windows device frequently moves between work and personal contexts.³⁹

When announcing the package of actions on 31 March 2026, the CMA described its investigation as “*provid[ing] a route to ensuring a level playing field among providers at a critical moment*”.⁴⁰ Yet, a level playing field will be harder to deliver if a large part of the addressable demand, and thus of the relevant digital activity, is excluded.

Therefore, the BCA encourages the CMA not to expressly and artificially descope ‘consumers’ from interventions that may ultimately apply to the proposed digital activities. Excluding consumers would, in the BCA’s view, significantly hinder the ability of the CMA to adopt effective remedies.

III. Potential issues and interventions

The BCA agrees with the potential issues and possible areas of intervention that the ITC identifies, in particular:

- Ensuring that customer purchasing decisions are not distorted by commercial arrangements, including “portfolio-wide incentives” such that rival providers of software products cannot compete effectively (para. 41(c));
- Ensuring that defaults, design and presentation choices do not steer users toward first-party products in ways that undermine effective choice (para. 41(d)).

Microsoft’s practices that restrict browser choice within its business software ecosystem fall squarely within the ITC’s proposed avenues of investigation and key issues that the CMA intends to explore (see paras. 36 et seq. of the ITC). Accordingly, the BCA is confident that the CMA can address such practices within the current scope of the SMS inquiry, without the need for any material expansion of its scope.

A. PC browsers are business software offering differentiated experiences

PC browsers are a crucial part of any business software ecosystem, including Microsoft’s, and different browsers offer different value propositions that appeal to different organisational users.

³⁹ Microsoft also describes how “*Microsoft 365 Personal, Family, and Premium subscriptions are great for both work and personal use*”. And Microsoft explains how it’s possible for subscribers to these personal plans to “*transfer your business documents and files to your new business plan*” (see Microsoft Support, “What’s the difference between Microsoft 365 plans for home or business”, available at: <https://support.microsoft.com/en-us/office/what-s-the-difference-between-microsoft-365-plans-for-home-or-business-31c36a5d-a13d-4b7d-9b1f-2076accbeeab>).

⁴⁰ CMA, “CMA announces package of actions on business software and cloud services”, 31 March 2026, available at: <https://www.gov.uk/government/news/cma-announces-package-of-actions-on-business-software-and-cloud-services>.

1. PC browsers are are critical for completing organisational tasks

Throughout the UK, every day the vast majority 15 to 25 million organisational users of the Windows OS access the internet as part of their work and do so using PC browsers.⁴¹

PC browsers are the primary research tool for many millions of knowledge-workers for carrying out core tasks such as creating memos, reports, notes etc.⁴² This may be through visiting specific web-pages or web-based resources and databases or general web searches using search engines as well as, increasingly, interactions with AI tools. Organisations use PC browsers to access cloud-based platforms and databases, such as internal document and data repositories, as well as communications tools such as emailing, messaging and videoconferencing. PC browsers are used for everyday business tasks such as online banking, business purchases, booking business travel and accommodation, as well as accessing HR platforms or internal company resources. The list goes on. As Microsoft recently observed, for a typical professional, “[e]very day starts the same way: users open the browser, review their calendar, and track down files.”⁴³

That PC browsers are business software on the Windows platform is borne out by the fact that Microsoft offers “Edge for Business”, a “*dedicated [...] experience*”⁴⁴ within the Edge web browser that has been optimised for use within large organisations.⁴⁵ Users can switch seamlessly between both “personal” and “business” profile browser windows within the exact same session, and can now make use of agentic browsing and increased integration with Copilot technology. More generally, the line between the PC browser and “classic” productivity apps is blurred, with browsers increasingly offering productivity features and functionality and the advance of AI technology is contributing to the further blurring of this distinction. In addition, PC browsers are often key gateways to products and technologies that may compete with Microsoft’s dominant business software, including challenger web-based productivity tools such as ChatGPT Business.

The ITC makes several references that indicate that there is scope for the CMA to explore and address the issues that we have been raising based on the current proposed designation scoping, and that doing so would be consistent with the concerns and objectives underpinning the investigation. In particular, the CMA explicitly states that it will “*seek to strengthen competition within the business software sector, prevent leveraging of any market power Microsoft may hold into adjacent activities to ensure that these are open and competitive markets, and protect users from any conduct which harms their interests*”

⁴¹ Investigation Notice, para.18(b)(ii).

⁴² According to Microsoft, “[b]usiness users across your organization often spend time on repetitive, multi-step work in the browser—filling out forms, navigating sites to complete tasks, and pulling information across tabs.” (Microsoft Windows Blogs, “New in Edge for Business: AI for work, safe from day one”, 20 May 2026, available at: <https://blogs.windows.com/msedgedev/2026/05/20/new-in-edge-for-business-ai-for-work-safe-from-day-one/>).

⁴³ See Microsoft Learn, “Microsoft Edge for Business”, 23 July 2025, available at: <https://learn.microsoft.com/en-us/deployedge/microsoft-edge-for-business>.

⁴⁴ Ibid.

⁴⁵ Ibid.

(emphasis added).⁴⁶ The CMA anticipates the designation covering Windows OS and productivity apps (including Copilot), activities from which Microsoft can easily leverage into its own browser, Edge.

Therefore, examining how Microsoft uses its business software ecosystem to restrict competition in browsers falls squarely within the CMA's investigatory remit, whether as (i) part of Microsoft's business software ecosystem (regardless of whether browsers are expressly referenced in the scope of the final designation), or as (ii) an "adjacent activity", similarly to cloud services, in respect of which the ITC indicates that the CMA intends to examine leveraging concerns (para. 41(a)).

2. Individual PCs browsers offer differentiated experiences, including for organisational tasks

When choosing a web browser, users often opt for browsers for certain use cases or that align with their specific needs and preferences. PC browser providers - including BCA members - differentiate their products to meet distinct user needs, including for users within organisations. For example:

- **Wavebox** (a UK challenger browser) is a desktop-only browser that is optimised for productivity and professional workflows. Wavebox markets itself as "*the getting stuff done browser.*" Wavebox offers features that improve workflow, organisation, and multitasking such as (i) Wavebox Connect, which allows team members to send direct messages, initiate voice/video calls, and share screens directly within the browser interface, reducing the need for external third-party collaboration tools (such as Teams); (ii) pinning of any web address as a persistent 'App' in the sidebar – from business tools like Gmail, Notion, and Slack to specific Google Sheets, and (iii) Focus Mode, that suppresses unread badges, audio, and desktop notifications for specific apps or entire groups, ensuring quiet time for deep work.⁴⁷ Wavebox also integrates AI directly into the workflow through Brainbox, which can draft reply emails, compare articles, answer questions about the tab being viewed, generate meeting notes, and summarise long articles.⁴⁸
- **Vivaldi** is a highly customisable browser that enhances productivity with features such as (i) advanced tab management, allowing users to tile pages side by side, stack tabs under a parent tab and organise them into different workspaces, (ii) a built-in notes tool to take notes while researching (iii) an RSS feed reader allowing users to access website updates without visiting each site, and (iv) an integrated mail client (that allows users to view mail in the browser through an always-accessible sidetab rather than having to open a new tab) and calendar that support multiple accounts and sync with services like Outlook or Google. Vivaldi strives to make the browsing experience more

⁴⁶ See the ITC, fn. 2, para. 38. See also para. 52: "A further potential area of concern relates to behavioural practices that influence customer choice, including defaults, pre-enabled settings, user journeys, and the way products and alternatives are presented within software interfaces. In complex business software environments, customers' and users' decisions may be shaped not only by price or technical capability, but also by design choices that affect prominence, visibility and ease of use".

⁴⁷ For more information see <https://wavebox.io/>.

⁴⁸ Wavebox, "Brainbox Overview (New 2026)", 20 May 2026, available at: <https://hub.wavebox.io/brainbox/>.

accessible, allowing users to change the browser layout to adapt to their specific needs.⁴⁹ Professionals with disabilities or facing other barriers should also be able to choose the browser that helps them be most productive.⁵⁰

- **Opera Neon**⁵¹ offers an agentic browsing experience that understands the user’s intent, assists with their tasks and takes action. Opera Neon runs on Opera’s AI engine, which is model-agnostic, using different models depending on the task. Currently, Opera Neon gives users access to various AI models. Opera Neon goes beyond the basics of chatting with AI agents by enabling the user to do and make things in collaboration with them. This is particularly helpful for users focused on business productivity because Neon works across tabs to execute and streamline various work-related tasks, e.g., conducting research, filling in forms, placing orders and replying to emails.⁵²
- **Waterfox**⁵³ provides a strong focus on privacy and a commitment to remaining free of built in AI-features, supporting organisational productivity where confidentiality is critical. Waterfox is built around minimising data tracking and collection and privacy protection by introducing anti-fingerprinting measures⁵⁴ and oblivious DNS features.⁵⁵ These features are helpful for organisations handling confidential information and can also contribute to a less distraction-prone browsing environment by limiting track-driven content such as targeted advertisement, pop-ups and other dynamic page elements. Additionally, Waterfox provides productivity features such as Tree Vertical

⁴⁹ Vivaldi, “One Feature at a Time: Making the Web Accessible to All”, available at: <https://vivaldi.com/blog/accessible-web/>. See also Vivaldi Help, “Accessibility Features and Settings”, available at: <https://help.vivaldi.com/desktop/appearance-customization/accessibility-features-and-settings/>.

⁵⁰ For more information see <https://vivaldi.com/>.

⁵¹ Opera Neon is an agentic browser launched on September 30th, 2025 that is able to navigate and synthesise across the web as well as cloud-based documents, collaboration software, and structured data (see further: <https://www.operaneon.com/>). On March 31st, 2026, Opera announced its Model Context Protocol Connector, a feature which allows users to choose their preferred third-party AI agent provider and connect it directly to the browser (see: <https://press.opera.com/2026/03/31/opera-neon-adds-mcp-connector/>).

⁵² For more information see <https://www.operaneon.com/>.

⁵³ See, for instance, Captain Time, “Wavebox Review: Can Changing Your Browser Make You More Productive?”, available at: <https://captaintime.com/wavebox-review-can-changing-your-browser-make-you-more-productive/>. See also “Wavebox - Super Browser for Work”, available at: <https://zago.agency/blogs/the-zago-journal/wavebox-super-browser-for-work>.

⁵⁴ Fingerprinting is a technique whereby websites identify and track users based on a combination of attributes from the user’s device and browser, e.g., screen resolution, installed fonts, OS, time zone and language settings, in order to create a distinctive profile to recognise users returning to their websites. Anti-fingerprinting protection warns users with a prompt when a website attempts to extract this data.

⁵⁵ See Waterfox, “Configure DNS over HTTPS protection levels in Waterfox - Waterfox Support”, available at: <https://www.waterfox.com/support/dns-over-https/>, (Oblivious DNS is a privacy protocol that dissociates your IP address from the searches so that the search provider cannot link what a user searches for to their specific network identity). See also Waterfox, “Waterfox’s protection against fingerprinting - Waterfox Support”, available at: <https://www.waterfox.com/support/waterfox-protection-against-fingerprinting/>.

Tabs and Automatic Tab Grouping, which allows users to organise tasks across complex sessions and maintain focus during multitasking.⁵⁶

B. Microsoft leverages its must-have Windows OS and Productivity Software Suites to restrict effective user choice in browsers

1. Microsoft distorts OEM purchasing decisions and browser competition through the portfolio-wide Jumpstart rebate scheme

Windows OEMs are business customers of Microsoft. The SMS investigation relates to Microsoft’s provision of software like Windows 10/11 to “organisations”. “Organisations” includes “businesses” from all sectors and so would capture Windows PC OEMs (such as Lenovo, HP, Dell *etc*). These OEMs are also “customers” of Microsoft, paying to license the must-have Windows OS for the Windows PCs they assemble, including for use within other organisations (educational institutions, private sector and public sector businesses *etc*).

Jumpstart is a “portfolio-wide incentive” scheme that distorts OEM browser preinstallation decisions. Through the Jumpstart program, Microsoft economically coerces its OEM customers, to ensure Edge is the exclusively preinstalled and default browser on Windows PCs. Jumpstart applies portfolio-wide: OEMs would lose their whole global rebate on the cost of a must-have Windows licence if they preinstalled a single third-party browser on a single device in the UK – a significant penalty. Jumpstart therefore falls squarely within the scope of the ITC and its concerns regarding “portfolio-wide incentive schemes”.

As a result of Jumpstart’s portfolio-wide requirements, rival browsers are foreclosed from OEM preinstallation opportunities. And OEMs cannot differentiate their devices for different organisational use cases (e.g., preloading a browser with added productivity features on laptops designed for students).

Jumpstart’s restrictions affect browser competition on the Windows PC used by millions of UK organisations. As set out above, 95% of UK businesses operate at a size where formal, B2B IT procurement and group device management is typically absent. Relatedly, smaller businesses will typically purchase their Windows PCs through retail channels. Two thirds of SMEs surveyed stated that they typically purchase devices through retail channels⁵⁷ increasing to 84% for businesses with 1-24 employees. Most surveyed SMEs purchase and manage their business computer devices themselves.⁵⁸ Consequently, millions of UK organisations will be using ‘unmanaged’ Windows PCs, bought through retail channels where OEMs pre-configure *all* their devices to comply with Microsoft’s portfolio-wide Jumpstart program. Microsoft thus subjects these businesses and their users to the Jumpstart ‘out of the box’ experience: Edge as the exclusively preinstalled and default browser. To address these harms, the BCA would welcome interventions to tackle

⁵⁶ See Waterfox, "6.6.0 - Major ESR 140 upgrade with vertical tabs, tab groups, and new tab experience", available at: <https://www.waterfox.com/releases/6.6.0/>, and Waterfox, "6.6.0 Beta 2 - Tree vertical tabs and automatic tab grouping", available at: <https://www.waterfox.com/releases/6.6.0%20Beta%202/>.

⁵⁷ Comprising physical or online retail stores, including a retailer’s business purchasing programs, and purchases directly from the manufacturer itself.

⁵⁸ See **Appendix 1**.

Microsoft's "*portfolio-wide incentives*", such as moving the portfolio-wide Jumpstart program to a device-by-device footing (see further section [III\(C\)](#) below).

2. Microsoft undermines effective user choice via dark patterns

Microsoft impedes the installation of rival browsers. Having secured Edge as the only out-of-the-box browser across all Windows PCs, Microsoft then leverages its Windows dominance by forcing anti-competitive steering practices via malicious choice architecture (i.e., dark patterns) and other technical measures in spaces exclusive to Microsoft, in order to impede direct downloads of rival browsers. For example, when a user searches for a rival browser to download via Edge on Windows PCs, Microsoft surfaces an intrusive, misleading banner telling users to stick with Edge instead. Microsoft also injects dissuasive pop-ups and banners onto the direct download page for certain third-party browsers. The vast majority of UK businesses are of the size where you would not expect additional IT department approval to be required to download a browser to a Windows PCs. And for those businesses that allow the download of established alternative browsers without approvals, Microsoft erects additional and unnecessary barriers, undermining that organisation's autonomy to determine how its users interact with browsers.

Microsoft prevents the effective use of rival browsers. Even if a user manages to download their browser of choice, Microsoft deploys additional hardwiring and steering tactics towards Edge, including outright ignoring the default selection. These include (i) access points that remain hardwired to Edge, (ii) default browser switches that do not propagate to all relevant use cases, and (iii) OS-level steering to restore Edge as default during OS updates.

While the BCA recognises that IT admins within large enterprises may be able to configure browser settings and defaults through group policies, that is insufficient to address Microsoft's restrictive practices that erode an organisation's autonomy to determine how its users interact with browsers.⁵⁹ First, as set out above, the vast majority of UK organisations (~91%) are micro businesses. They will not typically be deploying centrally managed devices with pre-configured group browser policies. Second, and in any event, these group policies cannot override many of Microsoft's dark patterns, such as the hardwiring of Windows Search and Widgets to Edge and Teams/Outlook opening in Edge (for M365 for business users). Third, actively configuring group browser policies requires effort on the part of IT admins who will likely have multiple, competing priorities.

Within larger organisations with IT admins, it is possible that Microsoft engages in additional leveraging practices beyond those that the BCA has been able to observe, possibly involving other elements of Microsoft's business software ecosystem, e.g., security software and

⁵⁹ Moreover, Microsoft may enable IT administrators to steer users back to Microsoft first-party solutions to the detriment of user choice. Microsoft is reportedly building a new user interface that will allow company IT administrators essentially to block the use of alternative AI chatbots when a user tries to open one in Edge, and present a button that redirects the user to Copilot instead. See Neowin, "Microsoft will allow IT admins to force Copilot in Edge over other AI apps", 15 April 2026, available at: <https://www.neowin.net/news/microsoft-will-allow-it-admins-to-force-copilot-in-edge-over-other-ai-apps/>. Microsoft has confirmed this strategy in a 20 May 2026 blogpost (see: <https://blogs.windows.com/msedgedev/2026/05/20/new-in-edge-for-business-ai-for-work-safe-from-day-on-e/>).

cloud. The BCA encourages the CMA to investigate Microsoft’s practices as they relate to Edge in specialist B2B channels and large organisations.

To address these ongoing, numerous and interlocking harmful practices, BCA would therefore welcome the potential interventions the ITC anticipates to “ensure that user interfaces, setup flows, and in-product prompts do not unduly bias outcomes towards [Microsoft’s] offerings” (para. 54).

Case study: Web links in Teams and Outlook ignore the user’s default browser

- Teams and Outlook are key productivity apps within the Microsoft business software ecosystem. They are also an important driver of traffic to browsers from web links shared between colleagues, customers, suppliers and so on.
- But since early 2024 Microsoft has ignored users’ OS-level default browser to open Teams and Outlook links in Edge instead.
- Although certain companies could in principle adjust the default policy so that links continue to be sent to their preferred browser – rather than Edge – making that change involves material work.
- For companies using Microsoft 365 for business, IT administrators will be unable to apply a group policy change for Outlook links; instead users will need to manually change their default browser. And that default switch is buried deep in the ‘advanced’ setting of Outlook and subject to an unintuitive user flow.
- As Microsoft notes, companies can use Microsoft 365 for business for up to 300 machines.⁶⁰ And as industry commentators note: “That’s going to leave a lot of small business[es] with the unnecessary headache of working out what has changed. Imagine being less tech savvy, clicking a link in Outlook, and thinking you’ve lost all your favourites because it didn’t open in your usual browser”.⁶¹
- Microsoft may argue that this change allows users to experience a new productivity-enhanced feature within Edge (the “side-by-side” view). But there is no reason why Microsoft could have not rolled out the “side-by-side” view within Edge, while still respecting a user’s choice of default browser.

⁶⁰ Microsoft, “What Is Microsoft 365 for Business? - FAQ”, available at: <https://www.microsoft.com/en-us/microsoft-365/business/microsoft-365-frequently-asked-questions>.

⁶¹ The Verge, “Microsoft is forcing Outlook and Teams to open links in Edge, and IT admins are angry”, 3 May 2023, available at: <https://www.theverge.com/2023/5/3/23709297/microsoft-edge-force-outlook-teams-web-links-open>.

3. Microsoft's browser choice restrictions distort competition from rival browsers, undermines organisations' autonomy, and dampens end-user productivity

Maximising productivity requires that organisational users can effectively use the browser that best suits their individual working needs. Furthermore, ensuring that third-party browsers can compete effectively on Windows PCs for these users is necessary to justify continued investment and innovation. Microsoft's current browser choice practices frustrate both of these goals, especially impacting small disruptive browser developers that are critical for bringing new types of browser innovations to UK businesses.

Microsoft restricts competition from rival browsers, undermining innovation and investment. Practices, like the Jumpstart program for portfolio-wide exclusive Edge preinstallation and the deployment of steering tactics, block and impede distribution and growth opportunities for competing, innovative browsers. By hindering the ability of rival browsers to showcase their differentiated products and reach the enormous Windows user base,⁶² Microsoft not only tips the competitive playing field in its favour, but also diminishes the incentives for investment in further innovations. Microsoft also prevents OEMs from offering specialised, differentiated devices for various user needs.

Through these practices Microsoft is providing a significant unearned advantage to Edge to the detriment of rivals, as evidence in Edge's share growth. Microsoft itself has publicly claimed that "*Edge surpassed 30% market share in the U.S. on Windows*" and has increased its share every single quarter for the past five years.⁶³

Edge's share will likely be even higher in the UK, especially on Windows 11 devices. As the CMA recognises, Windows 11 is Microsoft's main operating system in the UK. That dynamic will only increase as more organisations and users migrate to Windows 11 following the removal of support for Windows 10 in October 2025. Competitive conditions on Windows 11 thus provide an indication of likely medium-term developments on Windows devices. That is especially true for browsers because Microsoft typically deploys its latest dark patterns on Windows 11 devices. Indeed, BCA believes that Edge's share on Windows 11 devices in the UK to be significant, rising and **likely above 40%**.⁶⁴ In any event, it should be easy for Microsoft to quickly confirm this simple, factual point based on its own data on Windows 11 usage. Finally, Edge usage may be even higher within organisations: Microsoft itself

⁶² Microsoft recently told its investors that there are over 1.6 billion monthly active Windows devices worldwide (see fn. 17 above).

⁶³ Microsoft CEO Satya Nadella in Microsoft Q3 FY26 Earnings Conference Call, "Our Edge browser has taken share for 20 consecutive quarters", 29 April 2026, available at: <https://www.microsoft.com/en-us/investor/earnings/fy-2026-q3/performance>.

⁶⁴ Purely by way of analogy, Microsoft submitted in response to a European Commission RFI regarding whether to designate Edge under the DMA that, in the EEA, (i) Edge's share of *all desktop* browsing (based on Statcounter data) was 11.82%, and (ii) Edge represented approximately [20-30]% of all browser minutes *on Windows devices*. In the UK, Edge's share of *all desktop browsing* (based on Statcounter data) is 23.18% for April 2026 (i.e., the equivalent to (i) above). Therefore, applying the same pro-rata increase for *Windows devices* as in the EEA (ie the equivalent to (ii) above) would equate to an at least 40% share. This share is likely even higher on Windows 11. In any event, as set out above, it should be trivially easy for Microsoft to confirm Edge's share on Windows 11 based on its own data, and BCA members are ready to provide information to corroborate the CMA's findings.

highlights that the Edge for business experience has a **~60% share** in certain enterprise segments.⁶⁵

Microsoft's dark patterns undermine organisations' authority and autonomy.

Organisations should be able to freely determine how their users access and interact with different business software products (including browsers). That ensures that users are using the optimal service for their particular organisational use case and individual needs. Yet an organisation that uses Microsoft's must-have PC OSs and Productivity Software Suites is required to effectively sacrifice control over how their users interact with browsers. Microsoft's practices undermine organisational autonomy in three distinct ways:

- *First*, as set out above, the vast majority of UK businesses are of the size where they are highly unlikely to have their devices enrolled in a centralised IT management system. These businesses are therefore highly unlikely to have IT admins that will use group policies to configure browser settings on their users devices. Instead, each user must individually battle through Microsoft's dark patterns to download and use their browser of choice.
- *Second*, even where an organisation's IT department is willing and able to configure a particular browser as default across its estate, Microsoft's dark patterns and hardwired access points frustrate that decision. These dark patterns include hardwiring of Windows Search and Widgets to Edge, and Teams/Outlook opening links in Edge (for M365 for business users) – none of which can be overridden by group policies. In simple terms, when an organisation chooses not to use Edge on its Windows devices, Microsoft dictates otherwise.
- *Third*, Microsoft deploys ongoing interference. Windows OS updates can restore Edge as the default browser meaning that an organisation's IT decisions are periodically overwritten by Microsoft without consent (or at least without clear information due to deceptive design of the post-update prompts, which users are liable to click-through without realising they are resetting Edge as their default).

Microsoft's dark patterns increase the amount of time and effort users need to expend to perform simple tasks.

That includes downloading and installing a new browser and setting that browser as default across all relevant user cases. Time and effort a user spends trying to, for example, get PDFs or Outlook links to open in their default browser, cannot be spent on productive work tasks. And attempting to overcome the sheer volume of Microsoft's prompts, interruptions and deceptive designs, adds to users' cognitive load. These individual frictions, repeated millions of times every day across the UK, add up to many hours of lost productivity a day. Moreover, to the extent Microsoft's dark patterns are successful, users will be coerced into using Edge over an alternative browser that might better suit their needs and maximise their productivity. Likewise, users may (understandably, but incorrectly) blame their chosen alternative browser for the switch back to Edge. Therefore, Microsoft's browser choice practices not only frustrates effective individual user choice, but acts as a drag on

⁶⁵ Microsoft, "Edge for Business presents: the world's first secure enterprise AI browser", 18 November 2025, available at: <https://blogs.windows.com/msedgedev/2025/11/18/edge-for-business-presents-the-worlds-first-secure-enterprise-ai-browser/>, ("Top Microsoft customers already trust Edge for Business as their go-to enterprise browser, relying on it for ~60% of their browsing. And that number continues to grow").

worker productivity, business performance and the economy as a whole. By contrast, there are clear consumer and organisational benefits to allowing users to freely choose their browser of choice.

4. Developments in AI will make browser choice matter even more for organisations

The ITC has rightly identified AI as a key forward-looking consideration. Windows PCs are and will remain a critical gateway to key generative AI use cases. This is because PCs are particularly well-suited to important, complex and high-value AI tasks (due, e.g., to increased processing power and ability to use larger multi-monitor displays). Moreover, PCs are widely and increasingly used in the key sectors where AI usage is growing, such as business or professional use and education. Indeed AI is the “game changer” with regard to the rise of AI tools in PC-based productivity applications, predominantly (both for consumers and enterprise users).⁶⁶

As new chatbots and generative AI programmes emerge in this nascent and highly dynamic sector, there is intense user interest in interacting with different AI chatbots, particularly via browsers on PCs (consistent with the importance of PCs for high-value AI tasks).⁶⁷ As a result, these AI chatbots are intensely competing for users, especially on PCs given their criticality to multiple important AI use cases. Moreover, agentic AI is increasingly important on work PCs since agentic AI can act autonomously to plan workflows and execute certain actions, improving productivity for organisations and their end-users. Users could essentially delegate and route professional tasks to the AI on their PCs. Agentic browsing on PCs will be a critical tool for businesses in the coming years, cutting costs and increasing the speed and scale at which companies can deliver outputs. This is because the agentic tools accessed via PC browsers will be able to monitor many websites at once, compiling and analysing data across tabs for key workflows. Processes can be automated and carried out effectively for workstreams such as intelligence gathering, regulatory filings, vendor onboarding, and monitoring pricing or compliance information across multiple sources.

Microsoft itself has already integrated Copilot into the Edge browser interface through Copilot Mode. Microsoft recently announced that Copilot features will be integrated directly into the core Edge experience.⁶⁸ Microsoft has also announced agentic browsing and increased AI integration in “Edge for Business”.⁶⁹ Third parties are also launching their own AI-powered browsers that compete with Edge and its AI Copilot features as well as other Microsoft AI features and functionalities (e.g., the M365 Copilot app and Copilot features

⁶⁶ See CCIA, “The AI-Driven Future Is Now, and It’s Desktop-Enabled, October 2024”, available at: <https://ccianet.org/research/reports/ai-driven-future-now-desktop-enabled/>. See p.3.

⁶⁷ There is a high volume of direct navigation to AI chatbots on desktop browsers consistent with the importance of desktop for high-value GenAI tasks, e.g., reportedly ChatGPT’s website has over 5 billion monthly visits and 77% of ChatGPT visits in the US are on desktop (see Semrush, “ChatGPT Overview”, available at: <https://www.semrush.com/website/chatgpt.com/overview/>).

⁶⁸ Microsoft, “New updates to Edge across desktop and mobile”, 13 May 2026, available: <https://blogs.windows.com/msedgedev/2026/05/13/new-updates-to-edge-across-desktop-and-mobile/>.

⁶⁹ See Microsoft Windows Blogs, “New in Edge for Business: AI for work, safe from day one”, available at: <https://blogs.windows.com/msedgedev/2026/05/20/new-in-edge-for-business-ai-for-work-safe-from-day-one/>.

within Word, Outlook and so on). It is therefore unsurprising that Microsoft is now applying its same anti-competitive Edge playbook to AI. For example, Microsoft surfaces interactive banners telling users searching for AI-powered browsers (like ChatGPT Atlas and Perplexity Comet) and alternative AI assistants (like Claude) to use Copilot instead. Microsoft is also testing dissuasive pop-ups to appear on ChatGPT Atlas' download page.

In sum, organisations and their users should be free to choose the AI tools that they want, not have to make do with the solution imposed by Microsoft. But, absent intervention, the BCA is concerned that Microsoft will deploy its tried-and-tested browser dark pattern tactics to similarly distort competition and user choice in the AI space.

C. Addressing Microsoft's harmful browser choice practices through the avenues identified in the ITC would be effective, proportionate and have clear benefits to organisational users

The BCA recognises the need to focus resources and prioritise interventions, as anticipated by the ITC's reference to a Roadmap. We therefore recommend that the CMA prioritise the following tactics, deploying both (i) a general, software-agonistic duty to facilitate 'ease of switching' away from Microsoft's first-party products (including browsers) within – or accessed via – Microsoft's business software ecosystem, and (ii) more narrowly targeted browser-specific conduct requirements that would have the greatest impact in resolving Microsoft's barriers to accessing and using rival browsers on Windows devices within organisations.

- 1. Jumpstart portfolio-wide structure.** Jumpstart's portfolio-wide structure locks in OEMs and makes it non-viable for rival browsers (particularly smaller ones) to compete for (non-exclusive) preinstallation on even a single Windows PC. Jumpstart remains highly relevant in an organisational context because, as explained above, small and micro businesses buy millions of Windows PCs through retail channels which are configured to Jumpstart, i.e., with Edge as the exclusively preinstalled browser. An easy fix is to require Microsoft to move its current portfolio-wide deals to a device-by-device structure. This would address the ITC's specific concerns with portfolio-wide incentive deals, while still allowing Microsoft to pay for exclusivity and gain valuable promotion. Moving away from a portfolio-wide model would also open up opportunities for rival browsers to compete for preloads on particular devices or in particular organisational segments where they add value, e.g., browser productivity features on PCs targeted at small business owners or students.⁷⁰ For example, Windows OEMs would be free to partner with a productivity-focused browser in order to develop a productivity-focused PC built for SMEs.
- 2. A Windows PC browser choice screen.** The BCA recognises that choice screens have been typically considered in the context of individual users rather than

⁷⁰ Moreover, conduct requirements must be effective in achieving their purpose, and be sufficiently flexible so as not to be rendered ineffective, including by the actions of an SMS firm. Therefore, any conduct requirement related to Jumpstart should also prohibit Microsoft from threatening unrelated (i.e. non-Jumpstart) discretionary funding and other support in order to prevent OEMs from entering rival distribution deals. Absent this proportionate anti-circumvention requirement, Microsoft could easily maintain the effects of the Jumpstart program – and frustrate the aim of the 'device-by-device' conduct requirement – through other forms of economic coercion.

organisations. As explained above, however, the vast majority of UK ‘businesses’ will in fact be self-employed individual users. They will typically purchase devices through retail channels and will not have an IT department to configure and manage their browser settings. As a result, and due to Jumpstart, these users will likely experience Edge as the exclusively preinstalled default browser “out of the box” and encounter various dark patterns if they try and download an alternative. The CMA should therefore require Microsoft to implement a browser choice screen on Windows devices within organisations where Edge is preinstalled and set as default. Organisations could then choose to turn-off this choice screen when deploying devices to their uses, thereby retaining autonomy on how their users interact with external software products.

3. **OS updates pushing Edge as default.** This strategy is unambiguously misleading and undermines organisations’ autonomy by overriding – or at least pushing users to override – prior decisions. Microsoft agreed to terminate it in the European Union even before the DMA came into force. It should be a near-zero cost change to also terminate the practice in the UK. This is particularly important given that users will increasingly upgrade from Windows 10 to 11 because Microsoft started winding down support for the former from October 2025.
4. **Remove dissuasive banners when users try to download rival browsers.** Unfettered distribution via the open web is particularly important for rivals given the Jumpstart restrictions on pre-installation that affect millions of businesses in the UK. Microsoft, however, identifies a user who wishes to download a rival browser and exhorts them to do the opposite - a clear subversion of user intent and free choice. Removing these banners in the UK, as Microsoft has done in the EEA, would have zero cost. They appear to be triggered simply based on IP address location. And their removal would return autonomy to businesses, who can decide what – if any – limitations to place on the ability of their users to download browsers.
5. **One-click switch.** Three years ago Microsoft began blocking rival browsers’ one-click switch functionality that would allow them to prompt new users to switch the OS-level default with ‘one click’. Reversing this block would significantly ease the process of changing the default browser and boost productivity. It could be achieved quickly, at low cost, and with no adverse consequences, given that (i) rivals used to offer this functionality on Windows until April 2023, and (ii) it is already available to browsers on Android devices without issue. This would be especially beneficial for the millions of smaller businesses that will typically have ‘unmanaged’ Windows PCs and will not apply group-level policies on browser defaults.
6. **Respecting users’ default choice.** We believe that Microsoft’s failure to honour users’ choice of default browsers for all relevant entry points (e.g., clicking on links in Teams and Outlook and Windows Search, and opening certain file types, such as PDFs), undermines users’ choice of default and creates drags on worker productivity. In the EEA Microsoft has committed to respecting a user’s default browser for Windows Search, Widgets and Lock Screen. Rolling out these updates to the UK cannot have material engineering costs.

These interventions would have clear benefits to organisations. Allowing users to more effectively choose and use a browser that best suits their needs will improve productivity. The collective effects of increased productivity for individual end-users will improve the organisations of which they form part. Therefore, BCA encourages the CMA to prioritise these remedies when considering the Roadmap for potential interventions.

IV. Conclusion

Microsoft's tactics leverage its dominant Windows OS and M365 productivity software suite to frustrate users' choice of browsers, thereby damaging the user experience and lowering productivity for millions of businesses in the UK. This undermines the efforts of many differentiated, innovative browser developers to compete and reach new audiences, many of them being smaller developers who are especially vulnerable to Microsoft's tactics.

The BCA welcomes the CMA investigation into Microsoft's business software ecosystem as an important first step to addressing Microsoft's harmful practices, particularly in light of the CMA's broad focus on "organisations." In this context, it is important that the CMA include the retail channel in its investigation and to avoid artificial distinctions around "consumers" that impacts key enterprise use cases (e.g., BYOD). As the CMA's investigation progresses, the BCA encourages the CMA to have due regard to the role critical of PC browsers in organisational contexts, and the importance of free and fair competition in the PC browser space. A more open browser environment in Microsoft's ecosystem will stimulate greater investment, innovation and growth, both in respect of browsers and the other digital products accessed through a browser, such as key AI and productivity tools. Critically, such competitive innovation in the enterprise software space undoubtedly would lead to productivity gains for all UK businesses.

In sum, the PC browser sector is currently at an inflection point. Following the removal of support for Windows 10, users will increasingly move to Windows 11, where Microsoft's restrictions are the most intense and Edge's share is the highest. In addition, AI is playing an ever-increasing role in the work environment. PC browsers are a critical channel for AI competition and choice: users deserve better than having to make do with Microsoft-imposed AI solutions.

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The BCA stands ready to address any further questions that the CMA may have.

Appendix 1

Survey conducted by FTI Consulting on behalf of the BCA⁷¹

Q1. Which of the following sectors do you mainly work in? (Please select one response)

Response	Total
Privately owned	83%
Publicly owned (listed)	5%
School, university or other educational establishment	4%
Government	5%
NGO / Charity	3%
I do not work	0%

Q2. Where is your business's head office based? (Please select one response)

Response	Total
Scotland	8%
North East	4%
North West	13%
East Midlands	8%
West Midlands	13%
Yorkshire & the Humber	6%
East of England	10%
London	21%
South West	5%
South East	7%
Wales	3%

⁷¹ The survey was carried out between 19 and 22 May 2026 with a sample of 100 UK SMEs. This was a quick, small-scale and indicative online survey that was deployed in the limited time available to respond to the ITC. The findings confirm that this is an area the CMA should investigate further (i.e., concerning small business purchase and use of Windows PCs) through the CMA's own broader study of the type carried out or commissioned by the CMA in the previous SMS cases to-date.

Northern Ireland	2%
Not based in the UK	0%

Q3. Which industry best matches your company? (Please select one response)

Response	Total
Extractives & Minerals Processing	1%
Financials	6%
Food & Beverage	8%
Healthcare	7%
Infrastructure	2%
Renewable Resources & Alternative Energy	3%
Resource Transformation	2%
Services	23%
Technology & Communications	9%
Transportation	3%
Other	36%

Q4. How many employees currently work at your company? (Please select one response)

Response	Total
100 employees or more	0%
25–99 employees	46%
10–24 employees	10%
1–9 employees	44%

Q5. How many employees at your company use a computer for work? (Please select one response)

Response	Total
100 employees or more	0%
25–99 employees	36%
10–24 employees	16%
1–9 employees	48%

Q6. What is your seniority in your business? (Please select one response)

Response	Total
C-suite or equivalent	24%
Senior manager	20%
Middle management	37%
Lower management	4%
I am the only person in my business	15%
I am not in a managerial position	0%

Q7. What type of computer operating system(s) are predominantly used within your business? (Please select one response)

Response	Total
Windows PC or laptop	73%
Apple Mac / macOS device	21%
No computer devices used (mobile/tablet only)	6%
Other	0%

Q8. Who is primarily responsible for purchasing and managing your business computer devices? (Please select one response)

Response	Total
Myself	55%
A colleague without a dedicated IT role	5%
An IT specialist or internal IT department	23%
An external IT provider	6%
Nobody in particular	8%
Other	2%
Don't know	1%

Q9. Where are your business computer devices typically purchased from? (Please select one response)

Response	Total
Physical or online retail store (such as Curry's or Amazon), including a retailer's business purchasing programs	50%
Specialist B2B supplier (e.g. a managed service provider who configures software across all company PCs)	28%
Direct from manufacturer	17%
Don't know	5%

Q10. If your business uses Windows devices for work purposes, what type of Windows licences are used? (Please select all that apply)

Response	Total
Windows Home	30%
Windows Pro	48%
Windows Enterprise (e.g. E1, E3, E5)	18%
Other	0%
Don't know	11%
Not applicable – no Windows devices used	9%

Q11. Do you use your web browser for work-related purposes? (Please select one response) Web browsers are apps used to access and view websites and web-based tools on the internet (such as Edge, Chrome, Safari or Firefox)

Response	Total
Frequently	68%
Sometimes	25%
Rarely	7%
Never	0%

Q12. What work-related purpose(s) do you use the browser for? (Please select all that apply)

Response	Total
Research/information lookup	76%
Web apps (e.g., email, CRM, project tools)	58%
File downloads/uploads	57%
Internal company portals/intranet	37%
Other (please specify)	0%

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