



## Strategic Market Status Investigation into Microsoft's business software ecosystem

### CMA Invitation to Comment: Wavebox Response

#### I. Introduction

Wavebox<sup>1</sup> is a specialised desktop-only, productivity-first web browser developed and maintained in the United Kingdom (“UK”) that is optimised for productivity and professional workflows. We are “*the getting stuff done browser*”. Our users choose Wavebox because we offer, *inter alia*, well-designed workflow management, organisational tools, and multitasking capabilities, including built-in team collaboration tools (Wavebox Connect), persistent app pinning in the sidebar, “Focus Mode” for deep work, and an integrated AI assistant (Brainbox). Unlike many other web browsers, we are a paid for web browser, which naturally leads to our users having particularly high expectations.

As a member of the Browser Choice Alliance, we welcome the Competition and Markets Authority (“CMA”)’s market investigation under the Digital Markets, Competition and Consumers Act 2024 (“DMCCA”). This is a vital first step towards ensuring that UK desktop users are able to discover, choose, and retain their preferred browser free of interference and constraints.

This submission addresses the questions within the CMA’s Invitation to Comment (“ITC”)<sup>2</sup> that are most relevant to Wavebox’s position as a desktop-only productivity browser competing within and alongside Microsoft’s business software ecosystem.

#### II. **Q1: scope of the investigation and candidate descriptions of Microsoft’s business software ecosystem**

**Organisations and retail channel:** Wavebox agrees with the CMA’s broad definition of “organisations” in the ITC, which provides that the term “*includes, but is not limited to, businesses, charities, educational institutions and public sector entities*” (ITC, footnote 1).

We emphasise that the retail channel, which includes high street shops and online retailers, should be included within scope in addition to specialist B2B channels. We understand that many professionals who use Wavebox as their main daily productivity tool, especially those in smaller organisations of which there are millions in the UK, acquire their Windows PC through a retail outlet rather than a specialist enterprise procurement process. It would not be fair if smaller browsers like Wavebox were impeded from reaching this important organisational user segment. We note that there is nothing in the ITC or Investigation Notice to suggest that the CMA intends to exclude the retail channel so no amendments would be required in this respect.

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<sup>1</sup> See further <https://wavebox.io/>. Wavebox is also a member of the Browser Choice Alliance (“BCA”), a coalition of web browser providers dedicated to promoting genuine competition and choice in PC browsers for the benefit of consumers and developers alike. For more information, see: [www.browserchoicealliance.org](http://www.browserchoicealliance.org).

<sup>2</sup> CMA, “Strategic Market Status Investigation into Microsoft’s business software ecosystem: Invitation to Comment” (“ITC”) 14 May 2026, available at: [https://assets.publishing.service.gov.uk/media/6a044eeecd2e0e8b5b20b518/Investigation\\_Notice.pdf](https://assets.publishing.service.gov.uk/media/6a044eeecd2e0e8b5b20b518/Investigation_Notice.pdf).



Many, or even most, UK organisations rely on Windows PCs for work purposes, including accessing SaaS applications, managing email, working with spreadsheets and data, conducting research, and drafting documents. For these users, the browser is a key professional tool. It is impossible to imagine many categories of professionals doing their work without a PC browser. As mentioned, Wavebox is specifically designed for productivity. Features such as Focus Mode and Wavebox Connect directly respond to the needs of professionals using a single device for multiple workflows. This means that in Wavebox's case, the dividing line between productivity software and the browser is particularly blurred.

**SMS status:** Microsoft holds SMS in its business software ecosystem. Two elements are central to PC-based productivity and directly relevant to Wavebox:

1. Windows PC Operating System (“OS”), the platform on which Wavebox and all other PC productivity software must run. The CMA estimates 15-25 million UK organisational users of Windows in FY25.<sup>3</sup>
2. Microsoft 365 Productivity Software Suite (Outlook, Word, Excel, PowerPoint, OneDrive, SharePoint, Teams, Copilot). Wavebox competes with Microsoft 365 as an alternative way to organise and access productivity tools on the PC (for instance those using Wavebox Connect to initiate video calls or send messages may do so instead of using Teams).

**PC browsers as business software.** The ITC's candidate descriptions do not explicitly name browsers, but they should be recognised as a key part of any business software ecosystem. The ITC states that the CMA will assess the extent to which “*providers of individual business software products can compete effectively with elements of Microsoft's Business Software Ecosystem*” (ITC, para. 24(a)) and that the CMA has concerns regarding leveraging of market power into adjacent activities (ITC, para. 41(a)). As a productivity browser, any leveraging by Microsoft of market power in its Windows OS or Microsoft 365 suite is squarely within scope of the CMA's investigation.

**III. Q2: Please provide any submissions or evidence relevant to the avenues of investigation we have set out above. Are there other issues that the CMA should take into account, and if so, why?**

Users deserve to be able freely to choose which browser they will use for daily work, productivity and general tasks. Moreover, that choice should be respected.

**Barriers to entry and expansion (ITC, para. 24(d)):** Pre-installation on new PCs is the most important distribution channel for any PC browser. The vast majority of PCs sold in the UK come pre-shipped with Windows, where every user starts with only Edge preinstalled, which is also set as the default browser, thanks to Microsoft offering major OEMs “all or nothing” portfolio-wide discounts on Windows licences. The user journey begins here: to use Wavebox, a person must first use Edge to find and download Wavebox, then choose to pay for it, and then choose to set it as their default by navigating Windows' misleading and

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<sup>3</sup> ITC, para 18(a).



intrusive prompts designed to discourage them from changing their default (a long route, by design). A desktop-only product like Wavebox is thus locked out of pre-installation entirely (i.e., prevented from securing preinstallation on even a single device within an OEM's portfolio) and starts off behind the eight-ball.

**Barriers to switching (ITC, para. 24(c)):** The ITC pinpoints the issue of ensuring that defaults, design and presentation choices do not steer users toward first-party products in ways that undermine effective choice (para. 41.d). Even when our users, a large proportion of which are paying SMEs (i.e., business customers) actively choose Wavebox and go through the complex and burdensome process to set it as their default, Microsoft then employs numerous dark patterns that undermine that choice, such as continuing to force links from Teams/Outlook to open in Edge, resetting Edge as default after system updates, or other nudges and prompts to set Edge as default. This is an enormous drag on productivity and SMEs bear the brunt of this friction: they have to fight their own OS to keep the preferences that make them most productive. The time lost resetting choices and the barriers to switching, which this creates, could be far better spent running their businesses.

**IV. Q3: What are your views on how business software may evolve in future, including as a result of AI and increased cloud adoption, and how Microsoft's business software ecosystem might be affected by these changes?**

Browser-based AI is a growing dimension of PC productivity competition. The market is moving toward integrated AI functionality, with providers (including Microsoft) embedding AI features across products and workflows. In this context, the browser is becoming a key gateway through which users access and interact with AI-enabled tools.

Wavebox operates in this space through "Brainbox", a built-in AI assistant that operates contextually per tab, across any web application, without requiring the user to leave their workflow. This is an AI approach centred on flexibility, user control and seamless integration within existing workflows. Wavebox therefore has a strong interest in continuing to innovate and develop these AI and productivity features so that businesses and users can benefit from them.

However, Microsoft is deploying its tried and tested anti-competitive playbook to favour Edge over rival browsers in this emerging space. Rightfully, the ITC recognises as an area of concern "*behavioural practices that influence customer choice, including defaults, pre-enabled settings, user journeys, and the way products and alternatives are presented within software interfaces*" (ITC, para. 52). If Microsoft's browser leveraging is not addressed, it may also foreclose the alternative AI delivery models that rival browsers like Wavebox enable.

Wavebox therefore invites the CMA to consider how the development of browser-based AI may affect competitive conditions, and to ensure that independent providers are able to compete and innovate on a level playing field in this growing and strategically important space.



**V. Q4: Please give your views on whether the issues outlined in this section are the right ones for the CMA to focus on, or whether there are others we should consider.**

The CMA has identified a number of relevant issues. PC-only productivity browsers like Wavebox are particularly concerned about: (i) defaults and design steering (ITC, paras. 52–55), seen in Microsoft’s dark patterns that undermine user choice daily; and (ii) commercial arrangements (ITC, paras. 49–51), seen in Microsoft’s portfolio-wide distribution channel exclusivity (ITC, para. 49). We welcome the CMA’s focus on productivity software – we suggest that particular attention should be paid to the role of browsers within the Microsoft business software ecosystem. Browsers increasingly function as gateways to productivity tools, workflows and key AI use cases on PC, making this about more than just competition between browsers.

Microsoft’s leveraging practices risk affecting not just browser choice, but innovation and growth. PC-only productivity browsers like Wavebox depend entirely on Windows for distribution, so Microsoft’s OS control limits our and other smaller providers’ ability to compete, scale up and innovate. This risks foreclosing alternative productivity models before they can develop, to the detriment of businesses and users. Addressing these dynamics is therefore essential to ensure that providers like Wavebox can continue to innovate and develop alternative productivity solutions.

Wavebox is confident that with a level playing field it will enter a virtuous circle of attracting more users, being able to invest more in innovation and product development and therefore attract more users. This would not only be good for Wavebox, a UK business, but for all UK organisational users of Wavebox.

We would welcome the opportunity to provide further evidence or engage with the CMA as needed.