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Response to the CMA Invitation to Comment: Strategic Market Status Investigation into Microsoft's Business Software Ecosystem

Introduction

Vivaldi is an independent employee-owned browser vendor headquartered in Oslo, Norway. Vivaldi is a powerful, personal and private web browser (for all desktop platforms, iOS, Android and in-vehicle systems) that adapts to its users and offers more features than any other modern browser. We have 4 million users worldwide, including a growing [redacted] users (and [redacted] staff members) in UK.

We are responding principally to:

- Question 1 (scope of the investigation and candidate descriptions),
- Question 2 (additional issues and evidence),
- Question 4 (issues the CMA should focus on),
- and Question 5 (potential interventions).

Vivaldi believes that the CMA should include all use of the Windows Business Software Ecosystem by “organisations” as defined by the ITC. Consistent with this approach, the CMA should not confine its investigation to specialist B2B distribution or enterprise licensing environments, or centrally managed corporate deployments. Microsoft's own public statements demonstrate that standard retail Windows distribution channels, such as high street and online retailers, are positioned as a productivity and work platforms suitable for millions of entrepreneurs, freelancers, sole traders, microbusinesses and SMEs using Windows PCs in the UK.

We fully support the CMA's proposed focus on Windows 11 as the relevant OS version, and suggest that CMA should therefore consider the use of ordinary retail Windows 11 devices as part of Microsoft's business software ecosystem; the role of Microsoft Edge as productivity software and workflow infrastructure rather than merely a browser; and the extent to which defaults that cannot be easily and effectively changed, integration, and technical dependencies in retail Windows environments may affect competition and hinder the growth and productivity of UK businesses.

1. Retail Windows 11 is materially relevant to UK business activity

The CMA also correctly emphasises that Microsoft’s software ecosystem enables organisations “to perform work tasks effectively, securely and at scale.”

However, the investigation should not artificially distinguish between “ordinary” Windows environments and those optimized for use in larger organizations.

Both are used by “organisations” for professional purposes and Microsoft’s own public marketing materially undermines any such distinction.

In Microsoft’s official Windows 11 launch announcement, the company marketed standard Windows 11 as a platform for multitasking and productive work. Microsoft stated:

“Multi-tasking has never been easier”¹

and described Windows 11 as enabling users to:

“work on multiple apps simultaneously.”²

Microsoft also promoted separate desktop environments for:

“work, gaming, or school.”³

These statements are important because they concern Windows 11 generally, not Windows 11 Pro or enterprise licenses specifically.

Microsoft’s subsequent Windows marketing continues this approach. Microsoft states that:

“There are many ways AI in Windows 11 can help you stay productive”⁴

and that Windows AI features are:

“designed to enhance your productivity and creativity.”⁵

Microsoft further markets Windows generally as a productivity environment through statements such as:

“It’s time to get more done.”⁶

¹ Microsoft, “Introducing Windows 11”, 24 June 2021, <https://blogs.windows.com/windowsexperience/2021/06/24/introducing-windows-11/>

² Ibid.

³ Ibid.

⁴ Microsoft, “Windows AI Features”, <https://www.microsoft.com/en-gb/windows/ai-features>

⁵ Ibid

Accordingly, Microsoft itself presents “ordinary” Windows 11 as a productivity platform suitable for work activity, including by the millions of self-employed and small businesses in the UK.

2. SMEs, sole traders and microbusinesses are central to the UK economy

The CMA should avoid focusing exclusively on large enterprise IT environments when in reality the overwhelming majority of UK businesses are SMEs and microbusinesses.

UK Government statistics show:

- SMEs account for the vast majority of UK private sector businesses;
- 75% of private businesses have no employees beyond the owner-manager.⁷

This is directly relevant to the CMA’s assessment of:

- strategic significance,
- switching barriers,
- defaults that cannot be easily and effectively changed,
- interoperability,
- and ecosystem dependency.

In the UK, vast numbers of sole traders, freelancers, startups, charities, independent professionals, and microbusinesses operate using ordinary retail Windows devices and licenses rather than specialist enterprise deployments.

The CMA expressly identifies concerns regarding: “default settings, pre-enabled functionality, and design choices affecting prominence, visibility and ease of access within software.”

These concerns are especially relevant in unmanaged or lightly managed SME environments because they often lack dedicated IT departments, procurement specialists, or technical expertise.

Accordingly, limiting the investigation to Windows specialist enterprise licensing environments designed for large businesses would exclude the computing environments used by the overwhelming majority of UK businesses by number.

⁶ Microsoft, “Windows Productivity Tips”,
<https://www.microsoft.com/en-us/windows/tips/productivity>

⁷ UK Government, *Business Population Estimates for the UK and Regions 2025*,
<https://www.gov.uk/government/statistics/business-population-estimates-2025/business-population-estimates-for-the-uk-and-regions-2025-statistical-release>

3. Microsoft Edge should form part of the CMA’s competitive assessment

PC browsers are business software and Microsoft itself increasingly positions its browser Edge, not merely as a browser, but as productivity infrastructure.

The ITC identifies concerns relating to:

- interoperability,
- technical integration,
- technical tying,
- defaults,
- and leveraging into adjacent activities.⁸

Microsoft’s own statements demonstrate that Edge is directly relevant to those concerns.

In 2023, Lindsay Kubasik, Partner Product Manager, Microsoft Edge, wrote in a blog post titled *Microsoft Edge: Your AI-powered browser, innovating for businesses and developers* (emphasis added):

“In today’s digital-first workplace, **the browser has quietly become the new operating system for enterprise productivity**. From accessing SaaS platforms and cloud-native applications to enabling real-time collaboration and now AI-assisted workflows, **the browser is no longer just a window to the web—it is the primary interface for getting work done.**”

With our mission to be **the best browser for business**, we are harnessing the power of AI to help you and your organization to stay on the cutting edge. Microsoft Edge continues to be your copilot for the web—the first to integrate AI-powered search, and the only one with Bing built-in.”⁹

Microsoft stated in [its Build 2023 materials](#):

“Microsoft Edge is evolving into a dedicated work experience”¹⁰

Microsoft further stated:

“Hybrid work calls for a new browser model.”¹¹

⁸ CMA ITC, paras 41–55.

⁹ Microsoft Edge: Your AI-powered browser, innovating for businesses and developers

<https://blogs.windows.com/msedgedev/2023/05/23/microsoft-edge-build-2023-innovations-in-AI-productivity-management-sidebar-apps/>

¹⁰ Microsoft, *Build 2023 Book of News*, <https://news.microsoft.com/build-2023-book-of-news/>

¹¹ *Ibid.*

Microsoft's [Edge release documentation](#) similarly presents Edge as integrated productivity software:

- “The Microsoft Edge sidebar lets users access productivity tools side-by-side with their browsing window.”
- “Office in the Microsoft Edge sidebar.”
- “Outlook in the Microsoft Edge sidebar.”¹²

In 2025, Microsoft described [Edge as](#) a productivity tool:

“The browser has quietly become the universal workspace. What started as a simple tool for accessing the internet has transformed into the central hub for enterprise productivity, collaboration, and now—AI-powered workflows.”¹³

By [January 2026](#), Microsoft was saying

“The browser is now where business happens ... Browser has transformed how enterprises operate”.¹⁴

These statements are directly relevant to the CMA's concerns regarding AI integration, interoperability, workflow integration, and extension of market power into adjacent activities.

Under Microsoft's own commercial framing, Edge is:

- a productivity platform,
- a workflow layer,
- an Office integration layer,
- an AI integration point,
- and part of Microsoft's wider business software ecosystem.

Accordingly, any competition assessment that does not take into account Edge would fail to reflect the reality that PC browsers play an important role in Microsoft's ecosystem.

4. The CMA's proposed ecosystem approach reflects reality

The CMA correctly notes that Microsoft “presents itself as a one-stop-shop, marketing its products as a package of secure, integrated and easy-to-use software solutions.”

¹² Microsoft Learn, “Microsoft Edge Stable Channel Release Notes”, <https://learn.microsoft.com/en-us/deployedge/microsoft-edge-relnote-archive-stable-channel>

¹³ <https://techcommunity.microsoft.com/blog/microsoft-security-blog/securing-the-browser-era---from-cloud-to-ai-a-blog-series-on-protecting-the-mode/4460823>

¹⁴ <https://techcommunity.microsoft.com/blog/microsoft-security-blog/securing-the-browser-era---from-cloud-to-ai-a-blog-series-on-protecting-the-mode/4485131>

The CMA also correctly identifies concerns relating to:

- interoperability,
- bundling,
- defaults, design and presentation choices that steer users toward particular products in ways that undermine effective choice,
- technical integration,
- and embedded functionality.¹⁵

Again, these concerns are not confined to enterprise licensing environments.

Retail Windows environments increasingly contain integrated Microsoft account flows, Edge defaults, OneDrive integration, Teams integration, Copilot integration, Microsoft 365 prompts, and workflow integration across products.

The CMA is therefore correct to investigate “Microsoft’s Business Software Ecosystem”¹⁶ as a grouped and interconnected activity rather than as isolated products.

This integrated ecosystem positioning strongly supports the CMA’s proposed analytical approach that looks both at individual elements of Microsoft’s business software ecosystem as well as the integrated whole.

In any event, each of the distinct digital activities listed in the Investigation Notice, including the Windows PC OS and Microsoft’s Productivity Software Suite meet the SMS conditions in their own right.

5. Potential interventions

The CMA’s proposed areas of intervention are appropriate and proportionate.

In particular, the CMA should consider:

- interoperability obligations;
- neutrality obligations relating to defaults and presentation;
- restrictions on portfolio-wide rebates that close off important distribution opportunities developers;
- and measures preventing technical or behavioural steering that ignore or impede free user choice and push users toward Microsoft services.

¹⁵ CMA ITC, para 20.

¹⁶ CMA ITC, paras 41–55.

These considerations are especially important in SME and retail-device contexts, where users may be disproportionately affected by:

- defaults that cannot be easily and effectively changed,
- design friction,
- asymmetric interoperability,
- and ecosystem dependency.

The CMA should additionally ensure that any remedies or conduct requirements extend to:

- retail Windows environments;
- Edge integration;
- Copilot integration;
- Microsoft account integration;
- and related workflow-level integrations.

Failure to include those areas would risk leaving significant ecosystem leverage outside the effective scope of regulation.

Conclusion

Microsoft's own public statements demonstrate that:

- standard Windows 11 is marketed as a productivity and work platform;
- the distinction between "consumer" and "business" usage is increasingly blurred;
- Edge is positioned as productivity infrastructure rather than merely a browser;
- and Microsoft markets its products as an integrated business software ecosystem.

Because SMEs and microbusinesses constitute the overwhelming majority of UK businesses, the CMA should ensure that its investigation and any resulting interventions encompass:

- retail Windows 11 environments;
- usage by micro, small and medium sized businesses and sole-traders usage;
- and Microsoft Edge as part of Microsoft's productivity and broader business software ecosystem.

To exclude these areas would have the dual unintended consequence of both overlooking the computing environments most commonly used by UK organisations and failing to reflect Microsoft's own commercial positioning of its products.

Vivaldi is, of course, ready and eager to assist CMA with its investigation.

