

STRATEGIC MARKET STATUS INVESTIGATION INTO MICROSOFT'S BUSINESS SOFTWARE ECOSYSTEM

MOZILLA'S RESPONSE TO CMA's INVITATION TO COMMENT (ITC)

4 JUNE 2026

Executive Summary:

As a long-time supporter of a pro-competitive regulatory framework to address market power within digital markets, Mozilla welcomes the CMA's efforts to implement the Digital Markets, Competition and Consumers Act 2024 (the "DMCCA"). This new digital markets regime is a pro-business tool that, if deployed fully and effectively, has the potential to unlock growth and investment in the many UK start-ups and businesses that compete with and/or rely on the entrenched incumbents. It can also bring many benefits to UK consumers - both directly through greater choice and transparency, as well as indirectly through the benefits of greater innovation and investment.

Mozilla strongly supports the SMS designation of Microsoft in respect of its business software ecosystem. Taking this action and implementing appropriate CRs and PCIs would be an important step towards strengthening competition and innovation in digital markets, particularly in business-to-business markets. However, the CMA must also ensure that browsers are included within the scope of the designation. The browser has become a critical component of and gateway to Microsoft's business software ecosystem. Failure to include the browser in the scope of this investigation would ignore an important part of the ecosystem and an important tool to distribute other Microsoft services, including AI tools and search.

There is ample evidence of the need for both the SMS designation and for the inclusion of the browser within it. Microsoft already uses harmful design practices to force users onto its own Edge browser, even where they have intentionally selected an alternative browser. It also creates barriers to competition in non-operating system software, such as via compatibility issues with productivity applications and limitations on administering alternative browsers via its security software. The dynamics will only become more important and concerning with the increasing transition to cloud and AI-based systems. Microsoft already leverages its market position to bypass consumer browser choice within its own AI application, Copilot.

Experience in other jurisdictions, particularly the European Union's Digital Markets Act, shows that these types of interventions can be effective in increasing competition and consumer choice. For all of these reasons, Mozilla supports the CMA's investigation into Microsoft's

Business Software Ecosystem. Additionally, we strongly suggest the inclusion of browser software in the scope of any designation.

Question 1: Please give your views on the proposed scope of our investigation and candidate descriptions of Microsoft's business software ecosystem.

The proposed scope of the investigation includes a variety of software products. Most relevant from Mozilla's perspective are the Productivity Software Suite, PC Operating System, and Security Software components of the investigation. However, our comments may also apply with respect to other candidate software and systems.

In Mozilla's view, there is a strong case for grouping these products together for treatment as a single digital activity and for including browser software in the group. Each of the software and systems described can be carried out in combination "to fulfil the specific purpose of providing a software environment that enables organisations to perform work tasks effectively, securely and at scale" as described in ITC ¶ 21. A typical business software user is likely to either use, or use a system that is implemented via multiple components proposed for investigation.

For example, an average worker might use their computer's Windows PC Operating System for all aspects of their usage. That use might include the Productivity Software Suite, which relies on the underlying Operating System to operate. In a corporate environment, that Operating System will normally be managed via Security Software to implement needed security controls. Depending on the business and the user, they may also directly interact with a Server Operating System and/or a Relational Database Management System. Even if they do not directly interact, they are likely to use systems that themselves rely on those as underlying systems, such as identity management or remote resources.

In addition to the above-described software, there is one other critical element: the browser. As Microsoft notes, 50% of employee PC time is spent in a browser and "[t]he browser is the primary gateway to access work resources and AI".¹ It is an essential part of Microsoft's business software ecosystem, including for enforcing security controls, enabling remote working and allowing collaboration. This alone necessitates inclusion of the browser within Microsoft's productivity suite.

Moreover, the browser is not only a destination for employees to access the web. A number of Productivity Software Suite products can be accessed via the browser, whether as an alternative option (such as Outlook Webmail), the preferred option (such as the Microsoft365 webapps), or even as the only official option (as with InTune). This close coupling to the browser necessitates considering the browser as a component of the investigation, whether by

¹ Microsoft Edge for Business customer pitch deck, 2025-7-7
<https://partner.microsoft.com/en-GB/asset/collection/edge-for-business-partner-resources#/>

including it as part of the ecosystem or by examining the interactions of the Business Software Ecosystem with web browsers and how the ecosystem may limit competition amongst browsers.

Experience has shown that control of the operating system and other elements of the software ecosystem (as opposed to simply a position of market power in browser markets) gives browser developers, including Microsoft, a competitive advantage in browser markets. In the case of Microsoft, this has most commonly appeared in the form of harmful design patterns that attempt to shift users to Microsoft's own browser, Edge, at the expense of alternatives such as Mozilla's Firefox. It also appears in the form of incompatibilities between software such as the Security Software and non-Edge/Blink browsers. Taken as a whole, the design patterns and incompatibilities result in reduced competition and a reduced extent in which third-party software can integrate effectively with Microsoft's business software ecosystem. It is therefore critical that the CMA includes browsers within the scope of the designation.

In addition to including browsers in the scope of the designation, the CMA should also group the activities into a single digital activity. This reflects how Microsoft itself markets its business software suite.

If these activities are not grouped together as one digital activity, there is the real danger of an enforcement gap where, for technical reasons due to how particular digital activities have been defined, it may become difficult for the CMA to take enforcement action in future. Such an enforcement gap could manifest itself, for example, where the design of Microsoft's operating system or where incompatibilities between Microsoft's productivity software and independent third-party browsers has an effect on the browser market.

Mozilla recognises that there is scope, pursuant to s.20(3)(c) DMCCA for example, to put in place conduct requirements which prohibit the leveraging of market power in one activity (e.g., operating systems or productivity software) to increase a firm's strategic position in another digital activity. However, as will become clear below, a large proportion of the conduct which causes harm at the browser and browser engine level is related to decisions made at the operating system or web productivity software level, or is related to a design feature of the operating system even if not a result of leveraging market power. It is important to avoid a situation where the CMA has to rely on one particular conduct requirement focused on 'leveraging' to address many different types of harmful conduct.

It would be simpler, lead to less duplication, and would provide greater legal certainty for both SMS firms and any third parties seeking to enforce the conduct requirements, if Microsoft's activities were grouped together into a broader Business Software Ecosystem. This would still allow the CMA to supplement overarching conduct requirements putting in place general obligations or prohibitions (such as those related to self-preferencing or leveraging), with tailored conduct requirements covering more specific types of conduct within different parts of the business software ecosystem that might impact other parts of the ecosystem. One of the strengths of the DMCCA regime is that it allows for these more specific and tailored conduct

requirements. Such a designation would ensure that the strengths of the regime are fully maximised.

Additionally, grouping together the activities as a single ecosystem will enable the CMA to take into account future technological advances. This is especially relevant given the rapid expansion and enhancement of AI-enabled tools and the increasing integration of those tools into the business software ecosystem. Microsoft is a leading player in this expanding sector by way of its own Copilot products as well as its strategic partnership with OpenAI. Particularly given how frequently AI-enabled tools are operated via a browser interface, while containing deep links into other software such as the Operating System Software or the Productivity Software, this provides an additional reason to consider the Edge browser to be part of Microsoft's Business Software Ecosystem and to impose relevant conduct requirements. A broader definition will allow the CMA more flexibility to address competitive harms that may arise from the integration of AI tools.

Question 2: 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?

Mozilla has sponsored extensive research into how decisions in operating system and productivity software design impact browser competition. Our first such report, "Over The Edge: How Microsoft's Design Tactics Compromise Free Browser Choice," was released in 2024.² A follow-on report, Over The Edge 2.0, will be released in the very near future.

Weaponising the Windows Operating System to Undermine User Choice of Alternative Browsers

In the first Over The Edge report, researchers found that Microsoft employed numerous harmful design patterns in order to push users towards switching to or not switching away from Edge as their default browser. These patterns included:

- The imposition of the Edge First Run Experience after any operating system installation, even if the user solely wishes to obtain an alternative browser and switch away from Edge.³
- The inability to remove Edge from the system, even if the user has installed an alternative browser.⁴
- The use of pre-selected defaults and deceptive visual design patterns that violate Microsoft's own design recommendations in order to cause users to permit importation of browsing data from other browsers into Edge.⁵

² <https://research.mozilla.org/files/2024/01/Over-the-Edge-Report-January-2024.pdf> ("Over The Edge 1.0")

³ *Id.* at 22-24.

⁴ *Id.* at 21-22.

⁵ *Id.* at 24.

- The promotion of Edge when users search for some alternative browsers within Windows own search bar.⁶
- The use of popups from the Edge browser to dissuade users from downloading and installing alternative browsers.⁷
- Self-preferencing by including text recommending Edge as the default browser when a user seeks to set a default browser.⁸
- Additional dialog boxes imposed on a user when they attempt to switch to a non-Edge default browser.⁹
- Maintaining Edge as the default application for a number of web filetypes, such as .pdf, .xhtml, .svg, and .shtml files, even after a user switches their default browser.¹⁰
- Use of “finish setting up your device” flows, even if a user has been using the device for some time, along with deceptive design that does not prominently disclose to users that their default browser will be switched away from their choice and back to Edge.¹¹
- Using “dot info badges” to highlight actions Microsoft suggests be taken, including suggesting switching the browser back to Edge under the description “Use Microsoft recommended browser settings.”¹²
- Tight integration of Edge into Windows Taskbar Search, Widgets, Outlook, Teams, and Copilot such that when an alternative default browser is selected, Edge may still be used to open links from those points.¹³ Even if a user implements workarounds to detect these redirections and open them, Microsoft has historically acted to detect and disable these workarounds.¹⁴
- Integration allowing Copilot on Windows to interact with Edge, but not with other browsers.¹⁵

The Over The Edge 2.0 report (forthcoming) shows that these patterns continue to exist in Microsoft’s software, as well as identifying certain additional deceptive patterns. Most relevant is the treatment of alternative browsers in the Windows 10 to Windows 11 upgrade flow. In this upgrade, the default browser was reset to Edge and the user’s existing browser was not properly transferred to the new system. When a user upgrades or restores a backup from Windows 10 to Windows 11, Microsoft not only silently resets the default browser to Edge, but if a user searches the Windows taskbar for their previous alternative browser and clicks ‘Open’, the operating system redirects them to the Microsoft Store. This forces the user to re-download, re-install, and completely re-configure their default settings from scratch—a multi-step friction process. Windows 10 was officially sunset in 2025 and Windows 10 users receive notifications urging them to upgrade to Windows 11. By January 2026, Microsoft reported that Windows 11

⁶ *Id.* at 25-30.

⁷ *Id.* at 28-33.

⁸ *Id.* at 36-37.

⁹ *Id.*

¹⁰ *Id.* at 37-38.

¹¹ *Id.* at 42-45.

¹² *Id.* at 45-47.

¹³ *Id.* at 53-57; *see also*

<https://support.microsoft.com/en-us/topic/web-links-from-outlook-emails-and-teams-chats-open-in-microsoft-edge-b0e1a1c1-bd62-462c-9ed5-5938b9c649f0>

¹⁴ Over The Edge 1.0 at 56.

¹⁵ *Id.* at 55.

had over 1 billion users globally.¹⁶ By resetting default browser state upon the upgrade to Windows 11, Microsoft continues to harm competition in the browser market in favour of its own product.¹⁷

Anti-Competitive Behaviours in Non-Operating System Software

The Over The Edge reports focus primarily on interactions between Windows and alternative browsers. Microsoft also engages in similar behaviours in other arenas. Most pressing is the existence of significant incompatibilities between various Microsoft software and non-Edge browsers such as Firefox. For example, InTune security software has limitations when used with Firefox that do not exist when it is used to deploy Chromium-based browsers like Edge.¹⁸ Similarly, web versions of productivity software such as Word 365 and Excel 365 often break or lack functionality in non-Edge/Chromium browsers.¹⁹ Even if eventually fixed, users who experience broken websites are likely to be incentivised to move to a different browser. And as Edge is the default target browser for Microsoft webapps, it is the one least likely to experience this type of compatibility issue.

As noted above, Microsoft has used the Windows 10 to 11 upgrade path as an opportunity to reclaim browser market share. Microsoft has also used it to push other services during the upgrade, such as their OneDrive file storage service. This provides an additional reason to group Microsoft's offerings into a Business Software Ecosystem, rather than addressing them individually.

Question 3: 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?

AI-enabled tools continue to be integrated into the business software ecosystem. Microsoft is a leading player in this expanding sector by way of its own Copilot products and strategic partnership with OpenAI, as well developing its own models.²⁰ These tools often use a browser-based interface.²¹ There is also an ongoing trend of shifting from application-based software like Office to web-based equivalents such as Microsoft's 365 Suite. Especially given Microsoft's history of favouring its own browser within its products and employing coercive design practices to maintain its browser's position, as described above and in the Over The Edge reports, the increasing use of the browser as the access surface for AI applications will only increase the importance of competition in the browser market.

¹⁶ <https://www.theverge.com/news/869889/microsoft-windows-11-1-billion-users>

¹⁷ *Id.* at 62-63.

¹⁸ See, e.g., <https://learn.microsoft.com/en-us/intune/device-configuration/settings-catalog/common-tasks> ("Configure Microsoft Edge and Google Chrome" without corresponding settings for other browsers).

¹⁹ See, e.g., <https://webcompat.com/issues/135725>;
https://bugzilla.mozilla.org/show_bug.cgi?id=2033215.

²⁰ <https://microsoft.ai/news/building-a-hillclimbing-machine-launching-seven-new-ai-models/>

²¹ See, e.g., <https://copilot.microsoft.com/>.

Beyond the concerns around browser integration, there is the more general concern that AI tools can be used to reinforce the ecosystem of products. Because agentic AI tools often pull information from elsewhere on the open Web, but present that information within their own interface, users become increasingly insulated and isolated from alternative browsers, search engines, and sources of information. This is a classic anti-competitive barrier, making it more difficult for competitors to challenge for Windows users, particularly if the tacit walled garden approach is paired with similar coercive practices such as only opening links from an AI tool in Edge.²² There is evidence that Microsoft is already using its AI interfaces to bypass consumer choice and enforce Edge dominance. As found in the forthcoming Over the Edge 2.0 report, Windows Copilot employs a Forced Action to open web links in an Edge-powered side panel, ignoring the user's chosen default browser. Furthermore, before users can even interact with the content, Copilot forces them through a confusing modal ('Browse with your Edge data') that employs Trick Wording and Preselection (in some regions) to encourage data sharing. This demonstrates that AI is actively being used to build new walled gardens.

In the specific case of AI, an additional problem arises – self-training. Because of Microsoft's varied position as the supplier of everything from operating systems to browsers to productivity software, it has access to a stream of training data for AI. While text-based data was the first AI training frontier, there has been increasing attention paid to sources of other forms of data, particularly those that reflect human interaction with their environment.²³ In the case of Microsoft, its software and associated telemetry could provide an extremely rich stream of training data regarding how users interact with computers and computer software. Using this training data may help Microsoft to entrench itself in the AI space and, by integrating AI into its business software, further entrench its market position in those areas as well.²⁴

Microsoft has already taken actions that align with a number of these predictions, particularly with respect to integration of AI into its business software.²⁵ Mozilla believes the CMA should consider including AI-integration issues into its investigation into Microsoft's Business Software Ecosystem.

²² Over The Edge 1.0 at 56-57.

²³ See, e.g., <https://www.reuters.com/sustainability/boards-policy-regulation/meta-start-capturing-employee-mouse-movements-keystrokes-ai-training-data-2026-04-21/>.

²⁴ Mozilla has no information regarding whether Microsoft is currently using telemetry for this purpose; we only note the possibility here.

²⁵ See., e.g., <https://www.microsoft.com/en-us/windows/windows-11?wincampaign=copilot&form=MA1413;> <https://support.microsoft.com/en-us/office/welcome-to-copilot-in-word-2135e85f-a467-463b-b2f0-c51a46d625d1>.

Question 4: 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.

Question 5: Please give your views on whether there are potential interventions that are likely to be necessary and which may be effective, proportionate and have benefits for UK users and consumers.

Mozilla has taken Qs 4 and 5 together. When discussing appropriate interventions, Mozilla will explain why it considers that they are effective, proportionate and will result in benefits for businesses and consumers.

Mozilla believes that the CMA has identified the most relevant issues. With respect to the scope of remedies, Mozilla's view is that it would be somewhat artificial to impose remedies or interventions in relation to the Business Software Ecosystem that do not include remedies relating to browsers and browser engines. Given these areas are often interlinked, it would make the most sense for browser-related interventions to be considered together as part of a package of remedies in relation to the business software ecosystem.

¶ 41(a) *Prevent leveraging of market power into adjacent activities, such as cloud services.*

Mozilla agrees that this is an important goal for intervention. However, we note that the described remedies—FRAND approaches to service pricing regardless of cloud hosting (43a), restricting Microsoft's use of licensing that grants preferential access to products and services depending on which cloud they operate in (43b), and limitations on contractual practices limiting mobility between cloud providers (43c)—are all focused on contractual and legal remedies in cloud software. We respectfully suggest that they may be equally applicable in the context of browser usage. Restrictions on pricing, licensing, and contractual practices that might limit mobility between browser software are equally applicable and important to the health of the browser ecosystem and the Business Software Ecosystem alike.

Beyond contractual anti-leveraging obligations, technical obligations may be relevant. Potential technical remedies in the browser software ecosystem that avoid leveraging of market power may include browser choice screen requirements, discussed in detail below, conduct requirements that require Microsoft to make available any APIs or similar technical access to other browsers on the same basis as to Edge, requirements that Microsoft business software respect user's default browser settings, and other remedies designed to limit Microsoft's ability to use its market power in the Business Software Ecosystem to leverage an improved position for Edge at the expense of other browsers.

These remedies can be effective. For example, by limiting the ability to employ market power to force unfavourable licensing terms for disfavoured service providers, the ability to select winners and losers in the associated market is reduced. This, in turn, serves to enhance competition in those spaces by removing barriers to entry and anti-competitive market distortions.

¶ 41(b) Improve competition in business software by ensuring that technical design and interoperability enable customers to choose between different providers

Mozilla again agrees that this is an important goal for intervention. As noted in ¶ 45, “products may be architected in ways that work best with a provider’s own services or components, while interoperability with third party alternatives is limited, incomplete or subject to practical constraints.” Mozilla’s experience is that this is quite common in the productivity software space when discussing browser-based productivity applications such as Microsoft 365. Those applications can be architected in ways that limit compatibility with alternative browsers or present additional compatibility challenges not faced by Microsoft’s preferred browsers.

Again, remedies that focus on interoperability can be effective. Here, however, the exact scope of the intervention is critical. Interventions that give too much control over interoperability to the market leader are often ineffective, allowing the leader to delay and deny requests for interoperability. Examples of these flaws in some interoperability systems are described in Mozilla’s submissions to the CMA in relation to Apple’s use of restrictions to limit interoperability in its mobile operating systems. One potential intervention would be a conduct requirement that bars Microsoft from taking advantage of any proprietary or non-standard features in Edge when used with its productivity software, unless Microsoft provides all needed information for full interoperability of its productivity software in alternative browsers.

Any such intervention would need to be overseen and/or come with clear procedural requirements, such that competitors could actually take advantage of the system rather than be blocked by arbitrary hurdles. Additional remedies might include a conduct requirement that Microsoft not preference Edge over alternative browsers in its business software ecosystem products, such as by requiring it to respect the system-wide default browser choice in Teams and Outlook.

These types of intervention are also typically proportionate; interoperability requires giving others access to technical information and systems that Microsoft would already have access to, meaning that the imposition of the intervention is limited to providing existing information. It also would serve to place third parties on an equal footing with Microsoft, not to advantage them, restoring a proper competitive balance.

¶ 41(c) Ensure that customer purchasing decisions are not distorted by commercial arrangements like bundling, such that rival providers cannot compete effectively

Browsers such as Firefox should be able to compete without anti-competitive barriers put up by SMS firms. In respect of enterprise customers, this means ensuring that Firefox and other independent browsers can compete with the bundled product offered by Microsoft.

Currently, Microsoft does not separately price or offer Edge - customers do not have a choice or any insight into what they are paying for Edge as part of the bundle as Edge is not separately available in an enterprise form. Instead, Microsoft bundles Edge with its business software

ecosystem both financially, via inclusion into bundled services, and technically, such as by including it as the default option in Security Software.

This bundling reduces the viability of enterprise adoption of alternative browsers such as Firefox which lack the ability to bundle their browser in similar ways. It also dissuades independent browser makers from creating their own enterprise browser solutions, which have to compete with not just the technical barriers of integration but also with the competitive burden of asking for payment for a product that customers are not accustomed to paying for separately, even though the cost of the enterprise browser functionality is being paid via the bundled product.

An additional distorting arrangement is Microsoft's decision not to support browser-based use of its Microsoft 365 productivity suite on Android. Instead, Microsoft requires Android users to use its apps. This effectively blocks browser-based usage on Android, in turn reducing competition. It also has the non-obvious effect of limiting the effectiveness of browser-based security controls overall. An enterprise that wishes to rely on security controls implemented by an enterprise version of Firefox to control usage of Word 365 documents, for example, would not be able to rely on those same security controls on Android because of the inability to use Firefox on Android to access Word365.²⁶

41(d) Ensure that defaults, design and presentation choices do not steer users toward particular products in ways that undermine effective choice

Mozilla strongly believes that 41(d) is a necessary topic for the CMA's intervention. As documented above and in our Over The Edge reports, Microsoft has employed a number of coercive design practices in an attempt to steer users towards Microsoft products and away from alternatives.²⁷ These design practices violate Microsoft's own design guidelines,²⁸ strongly suggesting that Microsoft is aware that these choices are not made with the user's best interests in mind. Further, the fact that many of these deceptive practices disappear when used on recent versions of Microsoft's software set to the EEA region²⁹ show that they are not inherent to the design of the software but rather reflect deliberate design choices.

For example, "design or user experience choices" not just may but actually do "steer customers toward a provider's own products or services, even where third party alternatives are available and technically compatible." ¶ 53. Microsoft has been documented using each and every one of the examples given by the CMA—"prominence or placement of functionality within applications"³⁰, "integration of particular services into core workflows,"³¹ and "the number of

²⁶

<https://support.microsoft.com/en-us/office/which-browsers-work-with-microsoft-365-for-the-web-and-microsoft-365-add-ins-ad1303e0-a318-47aa-b409-d3a5eb44e452>

²⁷ See generally Over The Edge 1.0.

²⁸ Over The Edge 1.0 at 24, 44.

²⁹ Over The Edge 2.0 at 73-74 (forthcoming).

³⁰ See, e.g., Over The Edge 1.0 at 21.

³¹ See, e.g., *id.* at 51.

steps required to enable or access alternative solutions³²—both in the past and present, and is likely to continue to employ them going forward absent some form of remedy.

Numerous examples of these sorts of design and user experience choices are provided above in response to Question 2, but Mozilla wishes to highlight one particularly problematic example.

As described above, during the upgrade from Windows 10 to Windows 11, users who have selected alternative default browsers do not have that choice maintained and respected. Instead, they are reset to use Edge as the default, with significant negative impact on usage and retention rates of alternative browsers. Effective remedies here could include imposition of a requirement that Microsoft respect user-set default applications, including for browsers, during operating system upgrades, or imposition of a browser choice screen requirement during OS upgrades.

Potential interventions in this regard are discussed in more detail below with respect to Question 6.

Question 6: What are the key lessons the CMA should draw from measures imposed on Microsoft, in respect of its business software ecosystem, in other jurisdictions?

First and foremost, Mozilla notes that our recent research has shown that, in the wake of the DMA, Microsoft has abandoned several of its deceptive design practices in the EEA.³³ For example, in the EEA dissuasive banner ads for Edge are no longer present and there is no longer deceptive design that presents Edge options with greater visual weight than non-Edge options.³⁴ This alone shows that similar interventions can be effective in changing Microsoft's behaviour.

These changes were made in response to regulatory pressure, not as a response to frequent user complaints. Microsoft's public statements have confirmed that a number of the deceptive design practices identified in our Over The Edge reports were removed in the EEA region as a direct result of the DMA.³⁵ For example, setting your default browser in the EEA now sets it for almost all relevant filetypes, not just for html/htm files.³⁶ Setting your default browser also now pins it to the taskbar, rather than leaving Edge pinned and forcing the user to manually pin their browser.³⁷

Each of these interventions is likely to improve market conditions for alternative browsers, as well as improving consumer satisfaction with and access to those alternative browsers. Further, given that the interventions are already deployed in the EEA, implementing them within the UK market would require minimal additional burden on Microsoft.

³² See, e.g., *id.* at 36-39.

³³ Over The Edge 2.0 at 74 (forthcoming).

³⁴ *Id.* at 73-74.

³⁵ <https://blogs.windows.com/windows-insider/2025/06/02/updates-to-windows-for-the-digital-markets-act/>

³⁶ *Id.*

³⁷ *Id.*

We also note that the DMA's creation of a browser choice screen obligation, though not applied to Microsoft following the decision not to designate Edge, has been highly effective in the mobile browser market.³⁸ After the creation of the browser choice obligation, Firefox mobile installs in the EEA increased dramatically. In some jurisdictions, daily usage of mobile Firefox doubled.³⁹ This comports with extensive research into browser choice screens conducted by Mozilla, which concluded that browser choice screens have the potential to be effective if well-designed.⁴⁰ In this context, a well-designed browser choice screen will:

- Present the browser choice during system setup or at a comparable juncture, such as after a major update, not after the first run of a pre-installed browser.
- Present meaningful information about the browsers, as well as presenting a wider range of options to choose from.
- Present the options in a randomized-per-user order to avoid anchoring effects from presentation order.

Mozilla, *Can browser choice screens be effective?* at 10-12 (Sept. 2023).⁴¹ Users in our experiment reported increased satisfaction from the provision of more effective choice screens and additional information, and did not report that browser choice placed a significant burden upon them.⁴²

Mozilla does recognize that browser choice screens may not be sufficient on their own to address competition concerns and may need to be accompanied with stronger measures to address the ongoing effects of past anti-competitive conduct. And choice screens do not mean that the incumbent browser will never be chosen. As our experiment revealed, even with a well-designed choice screen, many users will still choose the default or incumbent browser. However, the browser choice screen at least serves to level the playing field between competitors.

Based on this evidence of effectiveness, Mozilla recommends that the CMA consider the inclusion of a browser choice obligation with respect to Microsoft's Operating System Software.

³⁸

<https://blog.mozilla.org/netpolicy/2026/05/11/six-million-selections-later-how-the-dma-is-giving-people-browser-choice/>

³⁹ *Id.*

⁴⁰

https://research.mozilla.org/files/2023/09/Can-browser-choice-screens-be-effective_-_Mozilla-experiment-report.pdf

⁴¹ *Id.*

⁴² *Id.* at 11.