

[COMPANY A]’s Response to the Invitation to Comment in relation to the CMA’s Strategic Market Status Investigation into Microsoft’s Business Software Ecosystem

4 June 2026

Introduction

1. This submission provides a response from [COMPANY A] to the Competition and Markets Authority’s (“CMA”) Invitation to Comment (“ITC”) published on 14 May 2026 in relation to its strategic market status (“SMS”) investigation into Microsoft’s Business Software Ecosystem.
2. This submission is strictly confidential, including [COMPANY A]’s identity and any identifying information as disclosure is likely to severely harm [COMPANY A]’s legitimate interests.
3. [COMPANY A] is [CONFIDENTIAL].
4. As noted in the ITC, Microsoft’s Productivity Software Suite – a key component of its Business Software Ecosystem – had 20-30 million business users in the UK. This represents a significant share of the total UK workforce of approximately 34 million people.¹ Microsoft’s ecosystem of products is therefore not only “*core to the IT infrastructure of most UK businesses and the public sector*”,² but also functions as a critical gateway in the provision of business and enterprise software in the UK.
5. Against this background, [COMPANY A] welcomes the CMA’s investigation and the opportunity to continue engaging with the CMA in this context and at any subsequent stages.

¹ 33,972,428 according to the Office for National Statistics’ estimate for the period July 2024 to July 2025. See ONS, EMP01 SA: Full-time, part-time and temporary workers (seasonally adjusted), 19 May 2026, available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/datasets/fulltimeparttimeandtemporaryworkersseasonallyadjustedemp01sa>.

² ITC, paragraph 18.

[COMPANY A]’s response to the ITC questions

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

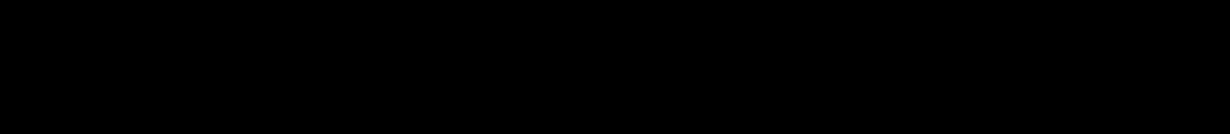
6. [COMPANY A] considers the proposed scope of the investigation to be appropriate and believes that the ecosystem framing described in paragraphs 21 and 22 of the ITC is important to appreciate the full extent of Microsoft’s market power and position, in particular in capturing the competition concerns at the ecosystem level rather than at the level of individual products. Microsoft’s market power across different components and layers of its Business Software Ecosystem are mutually reinforcing.
7. In particular, [COMPANY A] believes that any designation should encompass Microsoft’s activities in the provision of Productivity Software Suites including its artificial intelligence (“AI”) offerings to UK organizations, such as businesses and public sector organizations including educational institutions.

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?

8. [COMPANY A] considers the CMA’s envisaged avenues of investigation appropriate and believes that Microsoft’s licensing of Productivity Software Suites, as well as their interoperability with third-party solutions such as those of [COMPANY A], should be examined when assessing the competitive constraints Microsoft faces.

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?

9. In enterprise software, control over the initial interface is often decisive. AI assistants are increasingly becoming the interface through which users search for information, draft documents, prepare presentations, schedule meetings, summarise discussions and propose next steps. In other words, AI assistants are becoming the interface



through which work is performed. This creates a powerful surface for capturing user attention and directing user behaviour.

10. Microsoft's product ecosystem, which is core to the IT infrastructure of most UK businesses and the public sector, together with its leading position in Productivity Software Suites, gives it a powerful advantage as it integrates AI services across that ecosystem and seeks to capture user attention in this shifting environment.

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.


11. [COMPANY A] considers that the issues set out in Part 2 of the ITC reflect the main barriers that UK customers continue to experience when seeking to partner with independent software providers such as [COMPANY A] and combine their products with Microsoft's Business Software Ecosystem. In particular, [COMPANY A] considers there is a need to focus on ensuring effective interoperability between Microsoft's Productivity Software Suite and third-party solutions and preventing steering practices that undermine effective customer choice.

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.

12. [COMPANY A] considers that UK consumers will benefit from proportionate interventions designed to ensure effective interoperability between third-party solutions and Microsoft's Productivity Software Suites and to limit Microsoft's licensing practices where such practices undermine customer choice.

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?

13. Ensuring that any designations and interventions are appropriately scoped and effectively monitored will be key to delivering the benefits of open competition to UK customers across the different parts of Microsoft's Business Software Ecosystem and the markets in which Microsoft competes through that ecosystem. In particular,



properly considering the specific scope of Microsoft's EU Teams investigation commitments, which largely exclude the UK and a number of key Microsoft's products from their scope will be critical in ensuring the effectiveness of any potential CMA interventions.
