



**open web
advocacy**

Response to SMS Investigation into Microsoft's Business Software Ecosystem

VERSION 1.0.1


#MICROSOFT #BROWSERS #DEFAULTS
#USERCHOICE

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1. INTRODUCTION

Summary: Open Web Advocacy's primary recommendation is that the CMA should address the anti-competitive practices described in this document that undermine browser competition to the detriment of businesses and consumers.

We thank the CMA for inviting feedback. We are grateful for the opportunity to contribute to this process and to support the development of fair competition in the UK's digital economy.

Microsoft is engaged in a series of interlocking behaviors that dissuade users from switching from their pre-installed browser Edge, make it more difficult to do so and push users to reset Edge as their default browser. This is despite the significant advantage Edge has in being the pre-installed default browser on Windows. These behaviors have the effect of lessening competition for browsers on Windows, particularly for smaller browsers. We believe these practices are inherently anti-competitive. The use of Windows or Edge to undermine user choice, create switching friction, or steer users away from competing browsers is objectionable in itself. [We also do not see Edge's comparably smaller share of the browser market on Windows as a defense](#) and this behavior should be prohibited.

Browsers are a key business tool. Microsoft itself has recognised the centrality of the browser to business software, stating:



*Considering that **the average commercial user spends 60% of their time in the browser**, then leveraging Microsoft 365's built-in capabilities across Microsoft Edge and Office gives you common management and security solutions across the apps where your users are spending most of their time and accessing/using the majority of your internal data.*

[Microsoft - Blog](#)
(emphasis added)

Competition between browsers matters, as the Web is one of the most critical ecosystems in the world, and the browsers that power it dictate how well it runs. A small performance boost that [makes all web pages 1ms faster saves 300 years of wasted human time per year](#), and browsers

[have had](#) far more radical and [significant improvements](#) over the last decade. New features also change what is even possible to do in the browser, possibly the most striking example being the [porting of the full version of Photoshop to run in a browser using WebAssembly technologies](#), now widely supported by all major browsers.

The Web generates trillions of dollars in consumer value each year. Its impact is so deeply woven into everyday economic activity that it is hard to measure precisely. In 2017, economists Erik Brynjolfsson, Avanish Collis, and Felix Eggers [estimated that the Internet's consumer surplus in the United States amounted to about 40% of GDP, or roughly US\\$8 trillion annually](#). Browsers remain a central gateway to many of the digital services that generate this value. As a rough estimate scaling globally, that would imply around US\$50 trillion in annual surplus. Even if the true figure is significantly lower, the conclusion is the same. Competition among browsers is not a minor issue, but a major force powering a substantial percentage of the global economy.

Browser competition is at the heart of what makes the Web better. Browsers that have to fight for market share, and which are prohibited from using anti-competitive conduct to do so, must compete by improving their products. This can mean greater speed, stronger security, more features, better interfaces, improved privacy and a host of other facets. This provides an incentive to invest heavily in their browser or lose market share. Browsers that don't keep up will, absent strong anti-competitive barriers, simply be pushed out of the market.

In particular, Microsoft has engaged in the following behaviors, many ongoing, around the world:

- [Removing the one-click default browser setting for a range of file types](#)
- [Scare screens in Windows to push users to switch back to Edge](#)
- [Restricting Windows Search results for terms such as 'internet' to Edge](#)
- [Hardcoding multiple Microsoft apps to use Edge using microsoft-edge:// links](#)
- [Scare screens in Bing to discourage downloading a different browser](#)
- [Popups and injected scare dialogs in Edge to discourage downloading a different browser](#)
- [Non-neutral browser selection settings interface](#)

- [Preventing competing browsers from one-click default browser changing](#)
- [Microsoft Copilot blocking non-Edge browsers](#)

These behaviors undermine and suppress browser competition on Windows. This harms both business users and consumers, as it is this competition that drives the Web forward to their benefit. While Edge does run on Chromium, and thus benefits from its improvements, whether these tactics are allowed impacts how Microsoft invests in the Web.

OWA is not alone in identifying these behaviors. Mozilla commissioned [an independent expert report by Dr. Harry Brignull and Cennydd Bowles](#). The report examined Microsoft Windows 10 and 11, Edge, and Bing, and found that Microsoft “repeatedly uses harmful design” to influence users into using Edge. The report’s findings substantially corroborate the practices identified in this submission.



We have found that Microsoft uses a number of harmful designs to influence users into using the Edge browser. In our view, these designs coerce, manipulate, or deceive users and are therefore unjustifiable, with the potential to cause a variety of consumer, society, and market harms. Microsoft should stop using these techniques immediately. [...]

*Where Microsoft, or indeed any other company, cannot self-regulate and stop using harmful design techniques, **regulators and lawmakers should step up to protect users, societies, and markets from the harms that might result.** However, as long as dominant players continue to use these tactics, the browser market – and end users – will ultimately suffer.*

[Over The Edge - How Microsoft's Design Tactics Compromise Free Browser Choice](#)

(emphasis added)

There are strong arguments that this behavior is or should be unlawful in many regions around the world including under the [UK's Digital Markets Competition and Consumers Act 2024](#), [the EU's Digital Markets Act](#), [the USA's Sherman Act](#) and [FTC Act - Section 5](#), [Brazil's Competition Law](#), [Germany's Act against Restraints of Competition \(GWB\)](#), [Australia's Competition and Consumer Act 2010](#) and [Canada's Competition Act](#).

While we understand that only UK law (and in particular the DMCCA) is relevant to this investigation, the fact that so many jurisdictions have prohibitions on undermining competition, and in many cases via impairing fair choice of users, is interesting international context.

We believe that the CMA should include Edge in Microsoft's Business Software Ecosystem and implement the following interventions:

- Require that changing the default browser is a single, clear action that applies to all relevant file types and protocols.
- Prohibit the use of dark patterns, including pre-selected options, scare screens, and misleading prompts that steer users toward Microsoft's own browser.
- Mandate that all system components and Microsoft applications respect the user's chosen default browser, with no bypass mechanisms such as proprietary protocols.
- Ensure fair and equal treatment of competing browsers in Windows features such as search, widgets, and installation flows.

This will help restore fair browser competition to Windows to the benefit of all consumers and businesses that directly or indirectly rely upon the Web.

Browsers should compete on merit, not by undermining user choice through switching friction or deceptive patterns. The Web is far too valuable to the UK's economy to allow such undermining of the competition that drives it forward.

2. Answers to Questions

2.1. Q1: Viewpoints On Scope



Q1: Please give your views on the proposed scope of our investigation and candidate descriptions of Microsoft's business software ecosystem.

[CMA - Invitation to comment](#)

We support the CMA's proposed scope of the investigation and the descriptions of Microsoft's business software ecosystem. However, we consider that the description should be extended, or at least clarified, to ensure that Edge is captured. Edge is a key part of Microsoft's business software ecosystem.

Microsoft's own materials support this view. [Microsoft describes Edge for Business as](#) "the enterprise browser for secure AI at work" and states that "browsing with Copilot transforms Edge for Business into a proactive, agentic partner". It also says that Edge for Business brings "advanced AI into your browser with Copilot Mode" and encourages organisations to "set Edge for Business as the default browser for a segment of your workforce". Microsoft also describes Edge for Business as "redefining the enterprise browser for the AI era" with "advanced AI browsing with enterprise-grade security".



Discover your edge at work

Microsoft Edge is the fast and secure browser with productivity tools built in. It's designed to help you stay organized and manage your work and projects, so you can accomplish more.

[Microsoft - Promotional Materials](#)

(emphasis added)

Microsoft also promotes Edge itself (as opposed to Edge for Business) as a browser for work productivity. Its "Discover your edge at work" materials describe Microsoft Edge as "the fast and

secure browser with productivity tools built in” and say it is designed to help users *“stay organized and manage your work and projects”*. Edge for Business is a version of Edge for organisational use, with enterprise management, security, and policy controls built in. It is therefore best understood as Microsoft’s enterprise-managed sub-version of Edge, rather than a wholly separate product.

This demonstrates that Microsoft itself treats the browser as part of its enterprise software offering. Edge is integrated with Microsoft 365, Copilot, identity, security, management, and organisational data workflows. It is therefore closely connected to the same business software ecosystem that the CMA proposes to investigate.

This is particularly important because Microsoft’s conduct in relation to browsers directly affects fair choice and easy switching. As set out in our submission, Microsoft has used Windows and Edge to make switching browsers harder, steer users back to Edge, bypass users’ chosen default browser, and give Edge preferential treatment in Windows and Microsoft services. These practices include default-setting friction, scare screens and `microsoft-edge://` links that override the user’s choice of default browser.

If browsers are not clearly included within scope, the CMA may be limited in the remedies it can impose. In particular, it may be unable to fully address Microsoft’s ability to use Windows and other Microsoft business software to preference Edge and undermine rival browsers. The CMA should therefore ensure that Edge is within scope as it is a key part of Microsoft’s business software ecosystem.

2.2. Q2: Other Issues



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?

[CMA - Invitation to comment](#)

The CMA should investigate Microsoft’s conduct in relation to Edge as part of its assessment of Microsoft’s business software ecosystem. Browsers are a key interface for accessing business software, identity, security tools, and organisational workflows. Microsoft’s conduct in relation to

Edge therefore affects competition not only in browsers, but in access to Microsoft's wider ecosystem.

In particular, the CMA should examine Microsoft's use of Windows, Edge, Bing, Outlook, Teams, Widgets, Search, and proprietary link protocols to steer users toward Edge, make switching harder, or bypass the user's chosen default browser. These practices undermine fair choice and easy switching, and should be considered directly relevant to the CMA's investigation.

This fits neatly within the CMA's existing proposed actions to enable competition:

W (d) **Ensure that defaults, design and presentation choices do not steer users toward particular products in ways that undermine effective choice.** Customer and user decisions may be influenced by **default settings, pre-enabled functionality, and design choices affecting prominence, visibility and ease of access within software.** Interventions in this area could address user journeys, setup flows, in-product prompts or information disclosure **if these unduly bias outcomes toward Microsoft's products** or reinforce other sources of competitive advantage.

[CMA - Invitation to comment](#)
(emphasis added)

2.3. Q3: Future Evolution

W 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?*

[CMA - Invitation to comment](#)

Business software is already dominated by browser based web software. In the future, business software is likely to become increasingly browser-based. As more work moves into web applications, the browser will become an even more important gateway to productivity software, communications, identity, security, document management, and AI tools.

Microsoft itself has recognised the centrality of the browser to business software, stating:



Considering that **the average commercial user spends 60% of their time in the browser**, then leveraging Microsoft 365's built-in capabilities across Microsoft Edge and Office gives you common management and security solutions across the apps where your users are spending most of their time and accessing/using the majority of your internal data.

[Microsoft - Blog](#)
(emphasis added)

This makes Microsoft's conduct in relation to Edge especially important.

As the browser is therefore a key platform and entry point, the CMA should ensure that end users can fairly choose between different browsers and that those choices are respected across Microsoft's operating system, productivity applications, cloud services, and AI tools. Microsoft should not be permitted to use its position in Windows or business software to make Edge the default route into cloud-based and AI-assisted work.

2.4. Q4: Issues the CMA Should Prioritise



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.

[CMA - Invitation to comment](#)

We strongly support the selection of issues in the scope of business software. In our view, there is also a separate case for SMS designation from a consumer perspective.

In particular, this issue effectively covers all of our complaints in relation to *“Ensuring that defaults, design and presentation choices do not steer users toward particular products in ways that undermine effective choice”*. However, we believe this should be made more explicit by including a requirement that Microsoft then respects users' choices across both its operating system and its applications.

Without this additional focus, interventions aimed at improving choice at the point of selection may be undermined by later operating system or application-level behaviours that steer users back toward Microsoft products. We therefore suggest that the CMA expressly consider not only whether users are offered effective choices, but whether those choices are subsequently respected in practice.

2.5. Q5: Potential Interventions



Q5: 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.

[CMA - Invitation to comment](#)

We recommend the following interventions:

- Require that changing the default browser is a single, clear action that applies to all relevant file types and protocols.
- Prohibit the use of dark patterns, including pre-selected options, scare screens, and misleading prompts that steer users toward Microsoft's own browser.
- Mandate that all system components and Microsoft applications respect the user's chosen default browser, with no bypass mechanisms such as proprietary protocols.
- Ensure fair and equal treatment of competing browsers in Windows features such as search, widgets, and installation flows.

2.6. Q6: Other Jurisdictions



Q6: What are the key lessons the CMA should draw from measures imposed on Microsoft, in respect of its business software ecosystem, in other jurisdictions?

[CMA - Invitation to comment](#)

We believe that the CMA should draw the following lessons from measures imposed in other jurisdictions.

First, the [early 2000s US Microsoft case](#) demonstrated that control over a core operating system can (and has) been used to distort competition in browsers. Remedies must therefore address both contractual and technical forms of leveraging. It is not enough to prohibit formal exclusivity if the platform operator can achieve similar effects through defaults, technical integration, proprietary protocols, user-interface design, or degraded interoperability.

Second, the EU Digital Markets Act demonstrates the importance of effective user choice. Measures relating [to Apple and Google](#) show that regulators increasingly recognise the need for ensuring user choice is effective and respected.

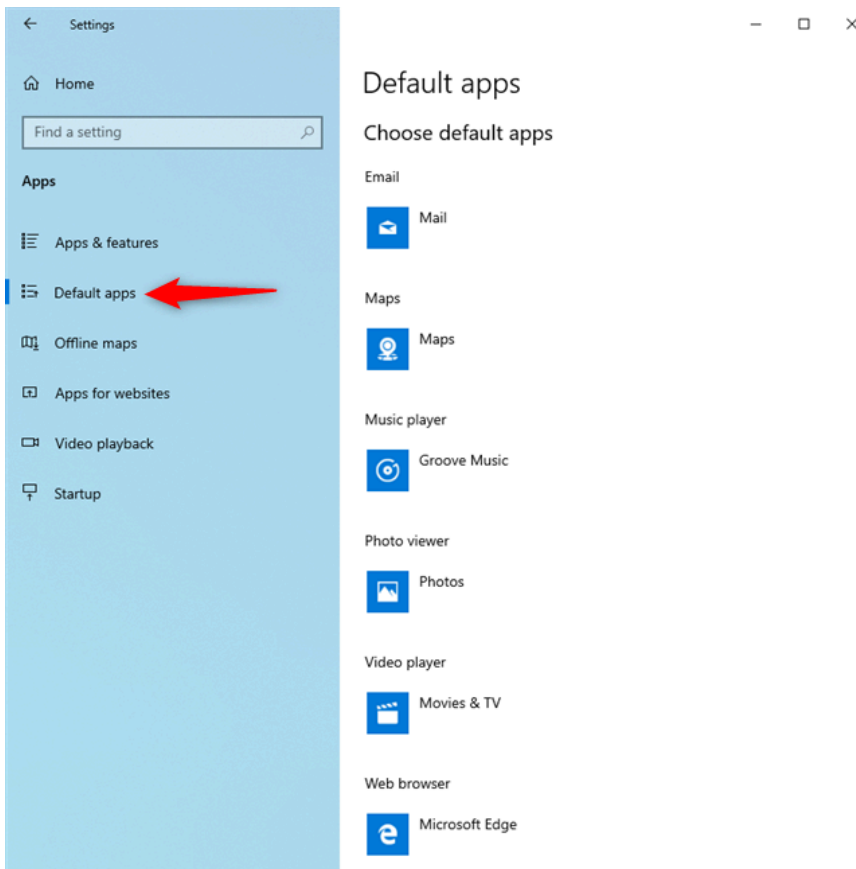
Third, we have included [a brief analysis on why Microsoft's behavior may be unlawful in other jurisdictions](#).

Finally, any remedies should be drafted as clear, outcome-focused rules that address each of the practices identified in this submission, while also preventing Microsoft from achieving the same result through new or modified mechanisms in future.

3. Microsoft's Current Anti-Competitive Practices

3.1. Broken default browser settings on Windows 11

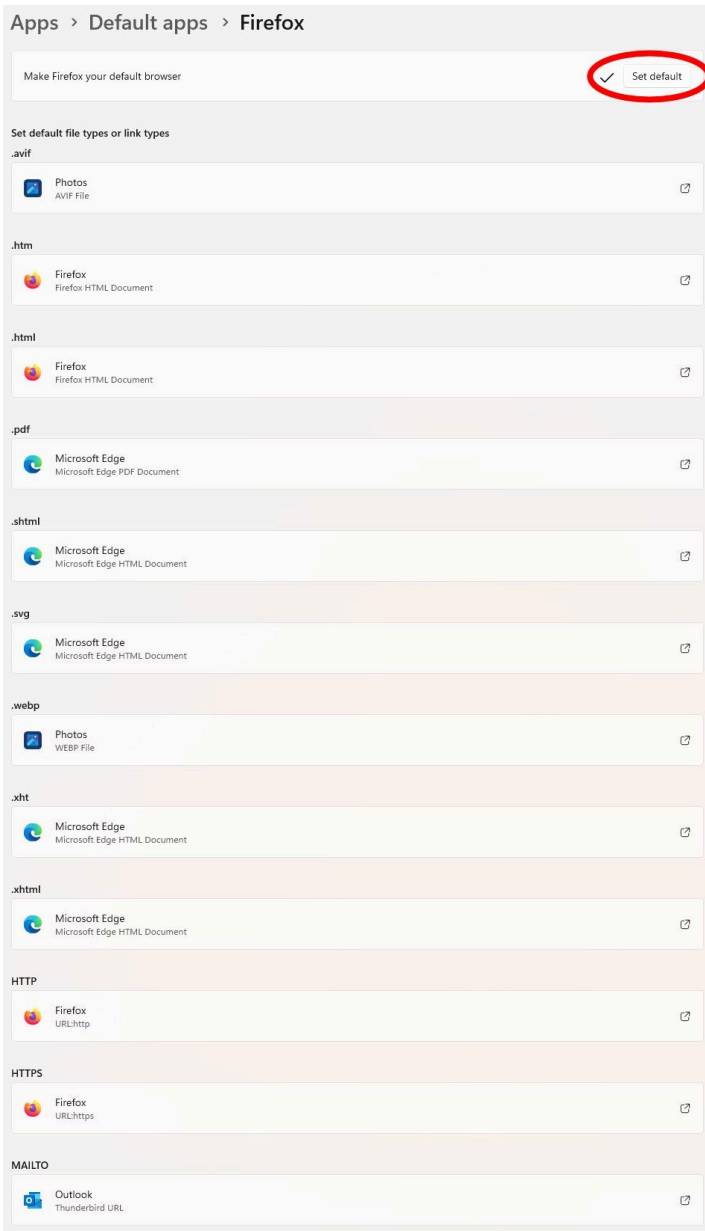
When Windows 11 first launched in October 2021, Microsoft removed the default apps settings page that allowed users to change the default browser with one click, which had been present in earlier versions of Windows. Instead, users had to choose which app they wanted to open each file type and link protocol. A typical browser app will support around 12 different types, making it very time-consuming to individually change all of these. Many less-technical users won't be aware of the full set of file types that a browser uses, and so forcing them to use this complex system likely results in a large proportion of them not managing to switch.



Windows 10 default apps page

Note that file types/protocols and individual app defaults can also be manually changed further down

Under pressure from browser vendors, users, and news outlets, in an update around the end of March 2022, Microsoft partially restored the old functionality of changing the default browser with one click. However, this button is hidden under the specific app's submenu, and only changes 4 file types - .htm, .html, .http and .https - while leaving all others unchanged. By default Edge will still open .pdf, .svg, .shtml, .xht and .xhtml, Windows Photos will open .webp and .avif, and Outlook will open MAILTO.



File types that are updated by pressing the "set default" button and those that are not

.shtml, .xht, .xhtml and .svg are all web links which should always open in the user's default browser, and Microsoft not updating this setting subverts the user's autonomy and decision-making. However, it is fair to say that not all users will choose to open .pdf documents in their default browser, some might not choose to open .avif or .webp images in it, and others won't send emails from it. As such it could potentially be disruptive if this button were to always change these settings. Another issue could arise if the newly chosen browser doesn't support a file type, such as a new image or video format, that the old browser/default app does support.

A simple and effective solution to these problems would be for Windows to always update all web links, and then to update any other file types that are supported by the new default browser *and which are currently set to open in a browser app*. Windows already knows which apps are browsers since it displays the set default browser button next to them, so this change would be easy for Microsoft to implement. In doing so it would ensure that changing the default browser really does change it, so that all supported links switch to opening in the new one, without breaking anything or disrupting the user's existing preferences.

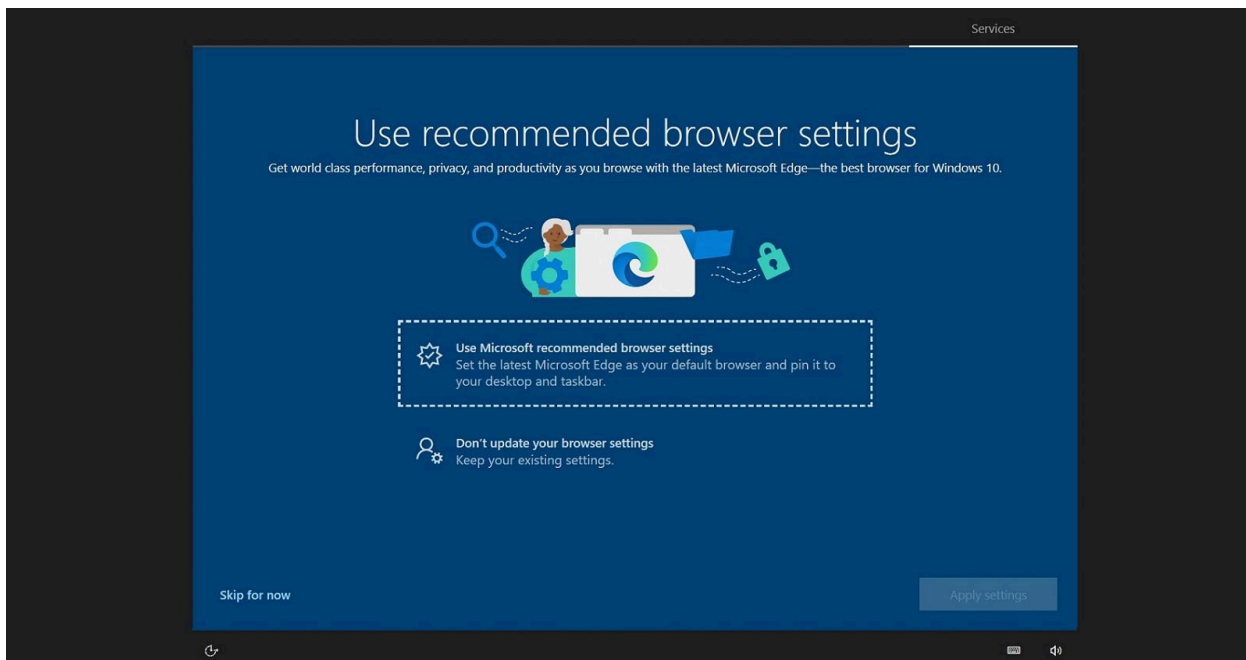
As well as this, the default browser option should be prominently displayed on the main default apps setting page (ideally alongside other default apps) as a drop-down menu, as happens on previous versions of Windows and most other operating systems. The vast majority of users do not want to change specific file types or otherwise navigate through extra pages to change their default app, they just want to be able to switch as quickly and easily as possible. By adding steps and making the process more difficult, Microsoft creates switching friction that is likely to deter users from changing the default browser, thereby preserving Edge's default position and steering more users toward Microsoft's own apps.

3.2. Windows pushes users towards Edge

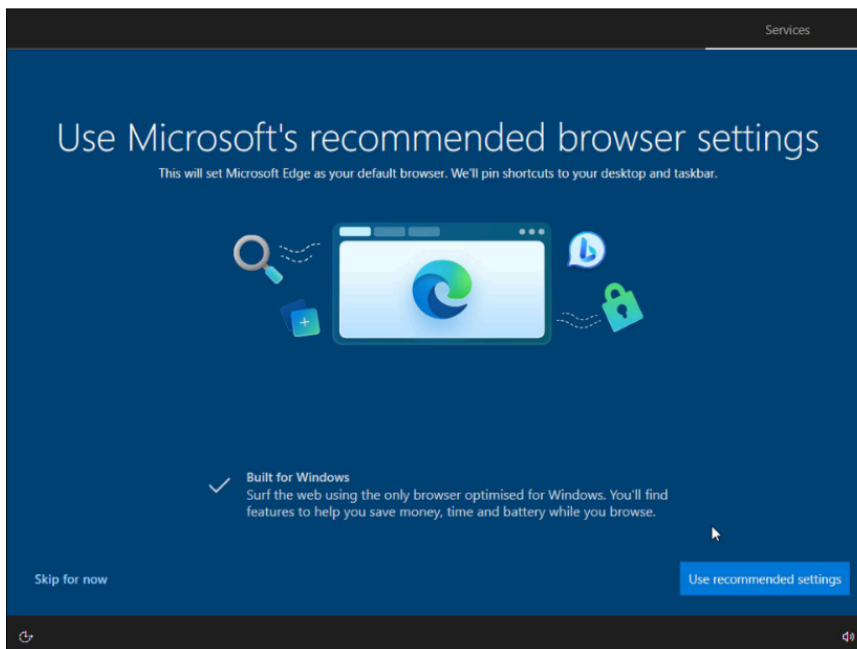
3.2.1. Restore Default Scare Screens

After installing a major Windows update, users have to go through a series of welcome/info screens before they can resume using their device. Microsoft has [often included](#) a "Use recommended browser settings" page, which nags users to switch their default browser to Edge and its search engine to Bing. If a user wants to keep their operating system up-to-date, and does not have Edge set as their default browser, then they have no choice but to click through this dialogue each time, as it cannot be disabled or turned off but only "skipped" until the next major

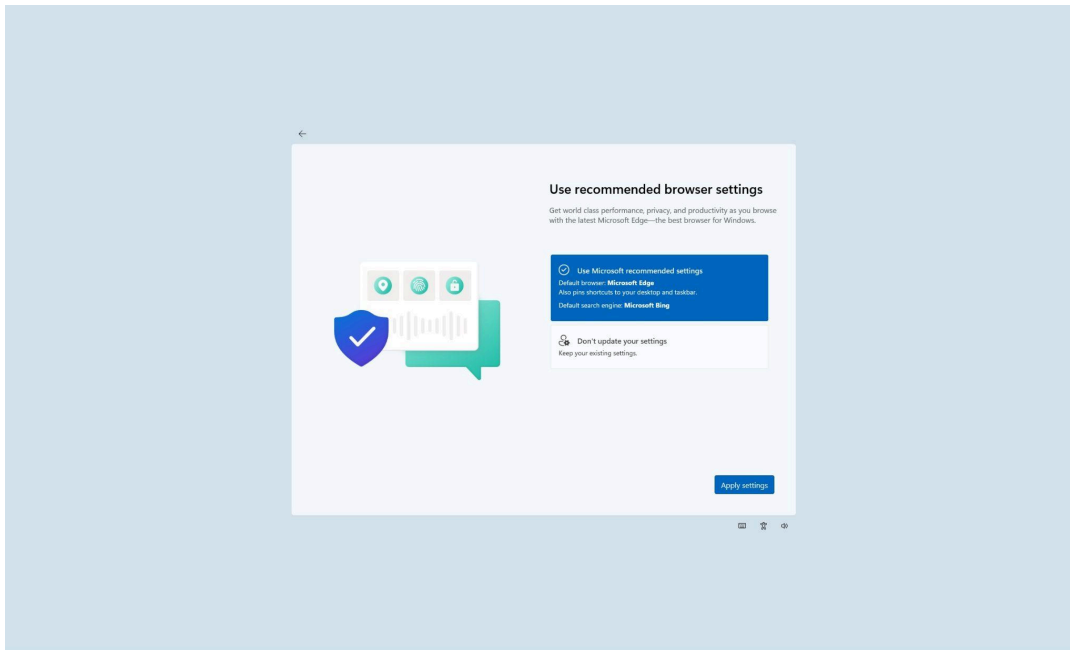
Windows update that shows it.



The original scare-screen that often appeared after a user had installed a new major Windows update



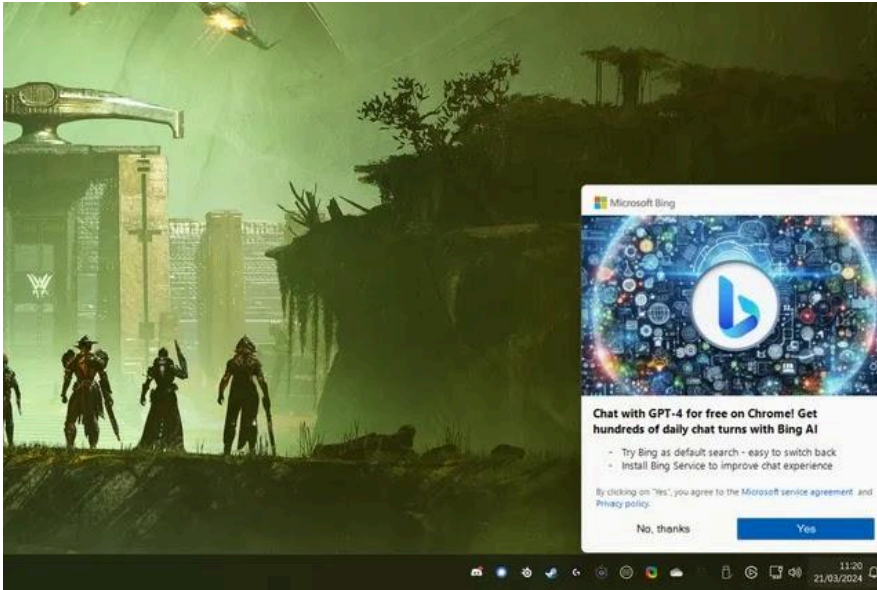
A variation of this page which makes it even easier for users to (accidentally) accept the Microsoft recommended browser settings, while only offering a "skip" rather than a decline button.



A Windows 11 design for this screen, which pre-selects the “Use Microsoft recommended settings” option

When the Chromium-based version of Edge launched in 2020, Microsoft also took the opportunity to [force Windows users](#) to try it out without any way of skipping or cancelling. As well as that, subsequent Windows updates have pushed [users to auto-import browser data](#) from other browsers to Edge, [further subverting the user's choice of default browser](#). The result is that a user who clicks through these scare screens without deviating from the recommended and pre-selected options may end up having their default browser changed, open windows/tabs and data carried over and Microsoft Edge opened in place of their usual browser without even realising.

In addition to these screens, Windows has [been reported](#) to show switch to Bing pop-ups whilst Chrome is open and Google is set as the default search engine.

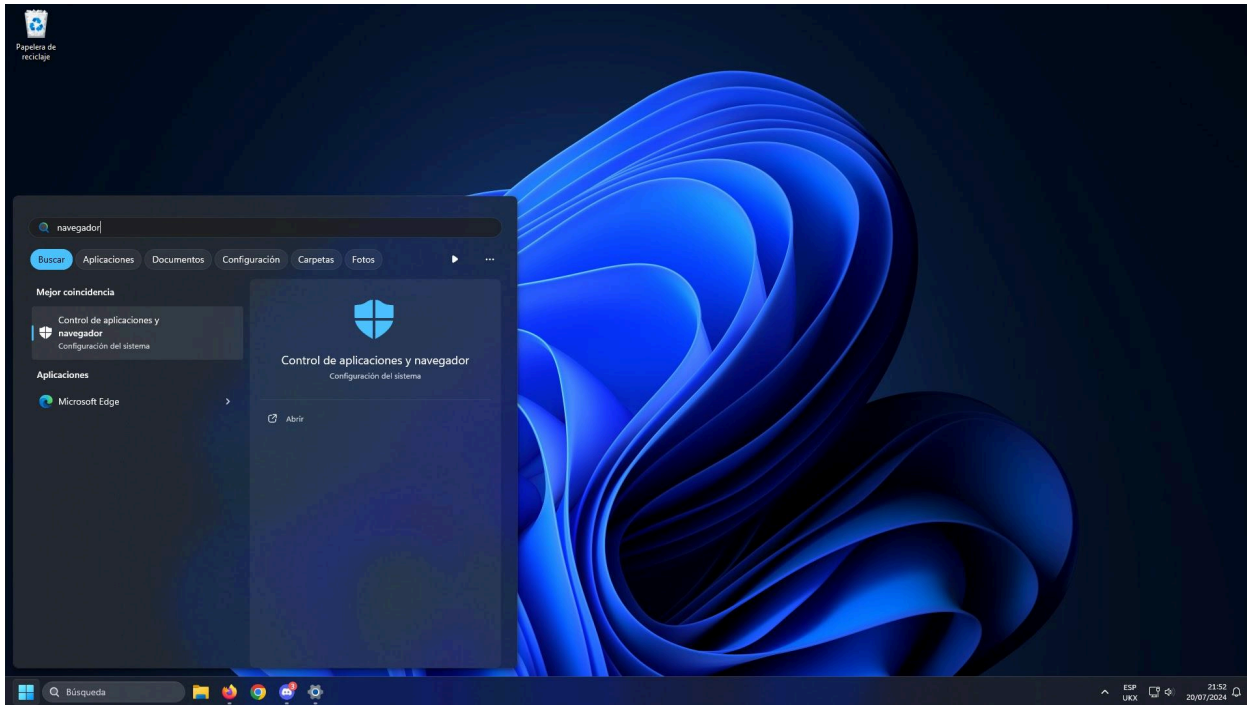


Windows pop-up to switch the default search engine in Google Chrome.

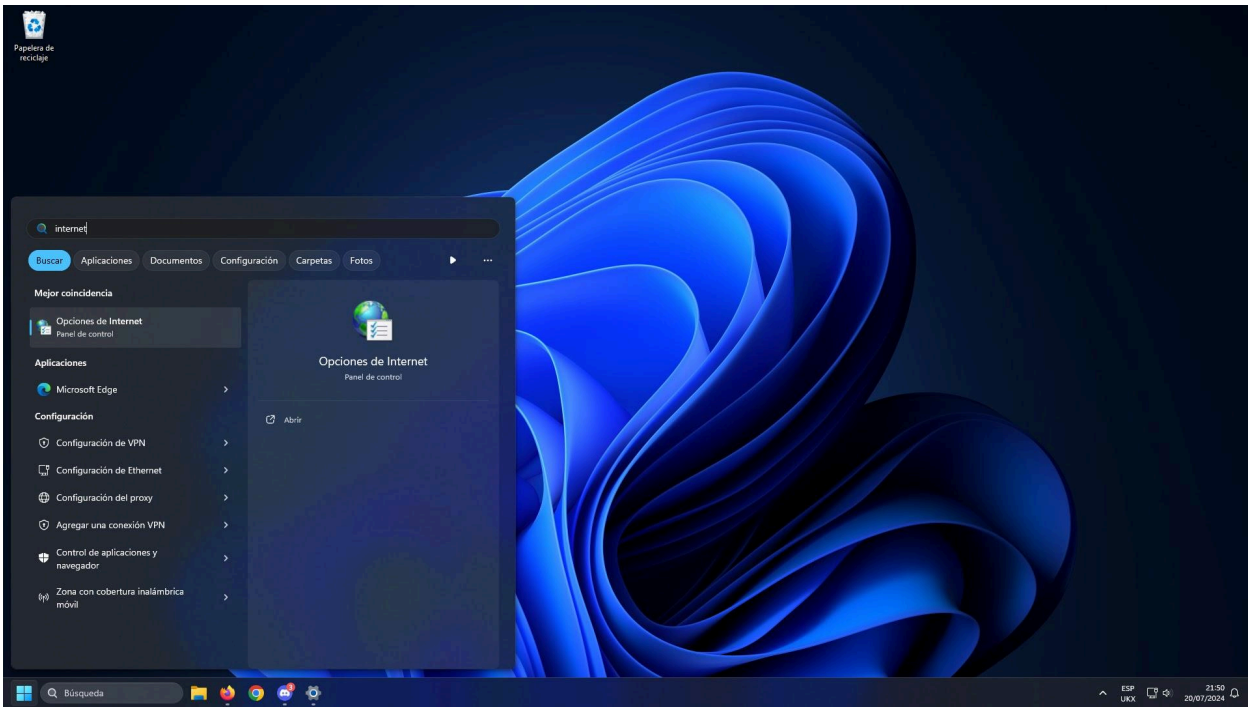
The only way for the default browser to be changed, including by Microsoft, Windows and other first-party services, should be for the user themselves to change the relevant Windows settings, either by browsers deep-linking to the default apps setting page as Microsoft [itself](#) requires all apps do, or by offering a system prompt for default browser switching such as how Android does.

3.2.2. Windows Search box

In the Windows 10 and Windows 11 Search Box, searching for “browser” and “internet” only shows results for Microsoft Edge and not for other browsers.



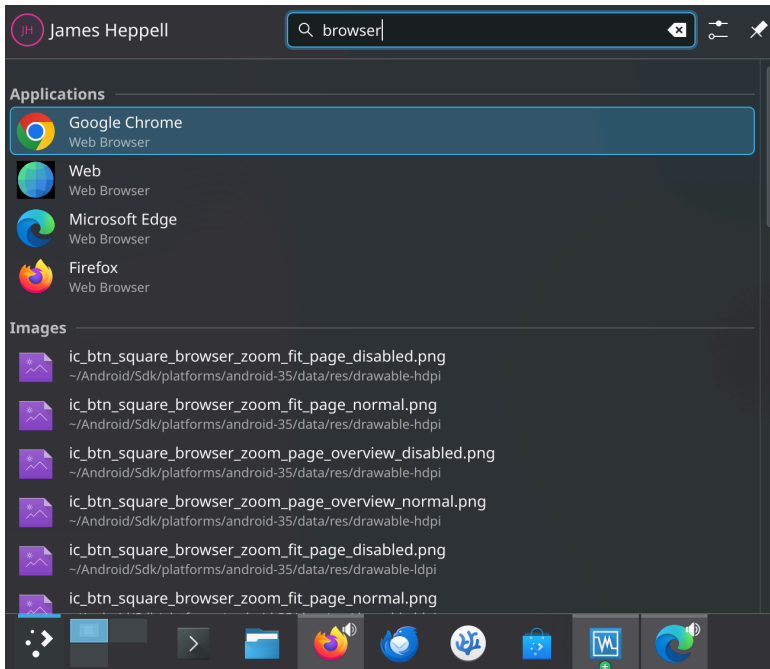
Searching for “navegador” in the Windows Search box (Spain region/language)



Searching for "internet" in the Windows Search box (Spain region/language)

On the device from which this screenshot was taken, there were 3 browsers installed: Edge, Firefox, and Chrome. Windows should show results for all browser apps when users search for those relevant terms, to avoid unfairly promoting Edge over third-party competitors. Using the existing system described in 2.1 for identifying browser apps, this should be an easy change for Microsoft to implement.

An example of how this could look is found on Linux desktops, which do not treat any browser preferentially, and instead surface results for all installed ones equally:

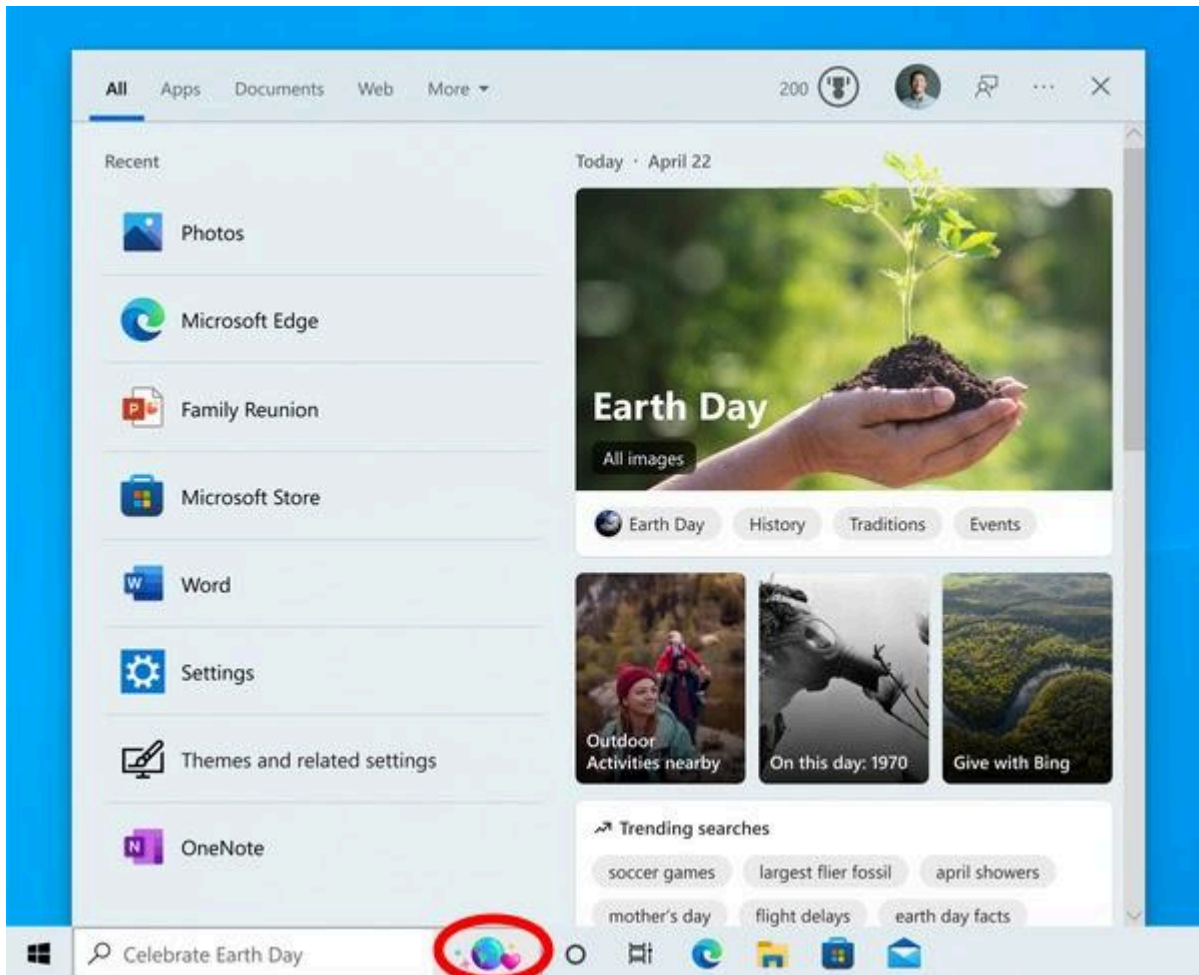


Searching for "browser" on KDE Plasma, Linux. Note: the order seems to vary, most likely the order they've found on the system. A truly random or an alphabetical system would ensure fairness.

3.3. microsoft-edge:// links: Bypassing the default browser

Alongside the initial launch of Windows 10 and Microsoft Edge in 2015, Microsoft added a new link protocol to Windows called "microsoft-edge://", which is followed by a normal http(s) web address. The purpose of this link is to redirect normal links to Microsoft Edge, instead of the default web browser that a user has chosen. The most prominent example of where this link is used is in the Windows Search box. The Windows Search box cannot be easily changed or removed, and the physical Windows key found on most keyboards opens it. It's also a place where users can search for apps and settings, turn off or log out of their computer, and see their start menu. In short, it's a very frequently used part of the operating system.

When a user completes a search using this search box, web results use the microsoft-edge:// protocol to force open in Edge regardless of the user's default browser choice. Similarly, clicking on Search Highlights on the search box, and clicking on items in the Widgets menu, which, like the search box, cannot easily be changed, also force open in Edge in Windows 10 and 11.



Search highlights in Windows 10

Due to this, many programs were created to “intercept” these links, and rewrite them as standard web links to open in a user's default browser. One such example was an app called EdgeDeflector. It worked by supporting microsoft-edge:// links and then having the user set it as the default for them. The idea was popular enough that this app had around 500,000 users and major browsers such as Brave and Firefox began to implement this functionality. In 2021, however, Microsoft [rolled out](#) an [update](#) to Windows 10 and 11 which prevented any app other than Edge from handling this link, and so reverting to the previous behavior of always ignoring a user's default browser.

In other words, highly technical users had actively taken steps to ensure their browser choice was respected, and Microsoft responded by modifying Windows to ensure that this preference remained overridden for microsoft-edge:// links.

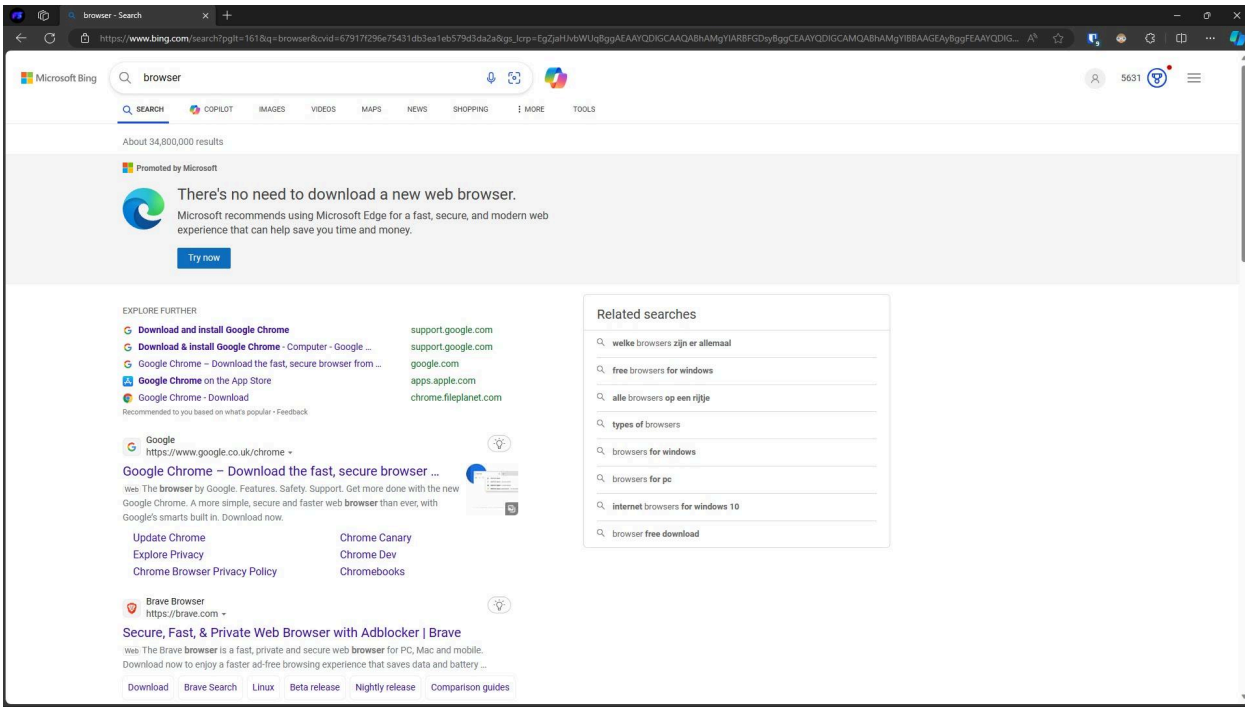
In addition to various Windows components, Microsoft recently [expanded](#) the [use](#) of these links to the Microsoft 365 versions of Microsoft Teams and Microsoft Outlook on Windows, two of their most popular services, and appears to have continued to do so even in DMA regions. It is possible for users to opt-out of it and return to using their default browser, but requires manual action on their part to change it. Likewise, they also pre-select, if not force, links to open in Edge instead of the default browser for the [Android & iOS versions of these apps](#), as well as for [Windows Defender](#).

In order to stop Microsoft from continuing to circumvent the user's chosen default browser, they should be obligated to respect the user's default browser for at least all of their services which come preinstalled and/or set as the default on Windows. Ideally this would be expanded to all other Microsoft apps and services on Windows and elsewhere.

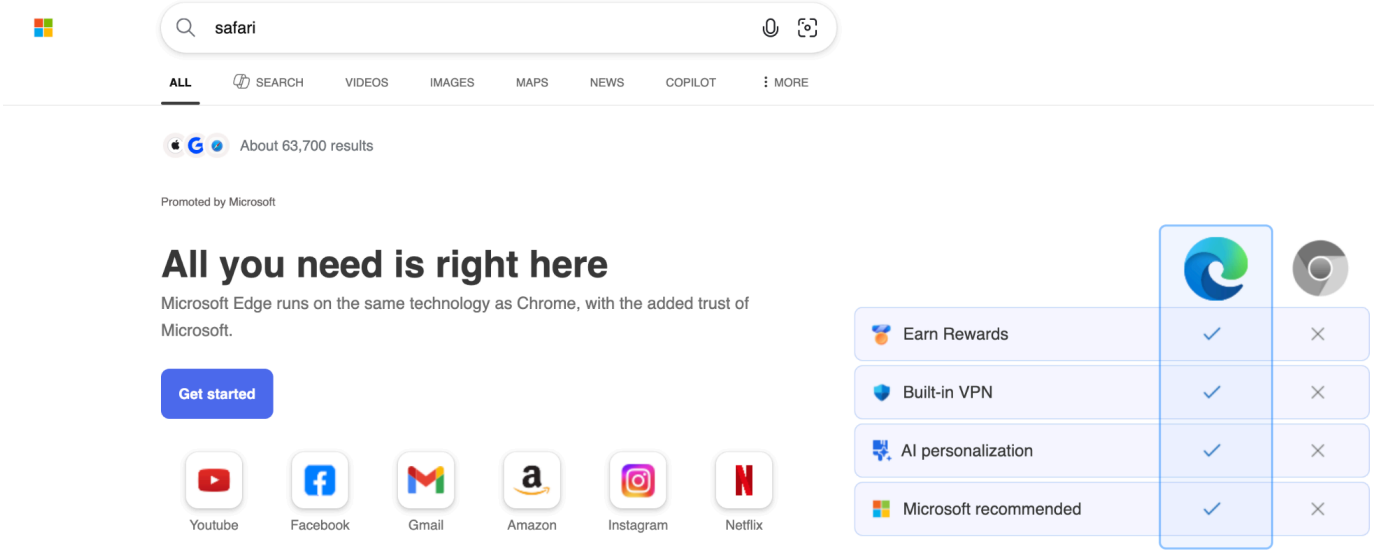
3.4. Downloading another browser on Windows

When a Windows 10 or 11 device is first set up from a standard Microsoft installation image, Microsoft Edge is the only preinstalled web browser and is set as the default. While it has recently become possible to install some other browsers through the pre-installed Microsoft Store, the overwhelming majority of users install applications through the open web. In order to do this, they must use Microsoft Edge to load the web page of a competing browser and download it. Microsoft is well aware of this, and throughout this process attempts to dissuade users from doing so.

When a user opens up Edge and searches for "browser", "good browser" or the name of a competing browser such as "Chrome", "Vivaldi", "Tor Browser", "Maxthon", "Safari", or "Chromium", a banner prominently appears above the first search result telling users "There's no need to download a new web browser". Previously this also appeared [for other search terms](#).



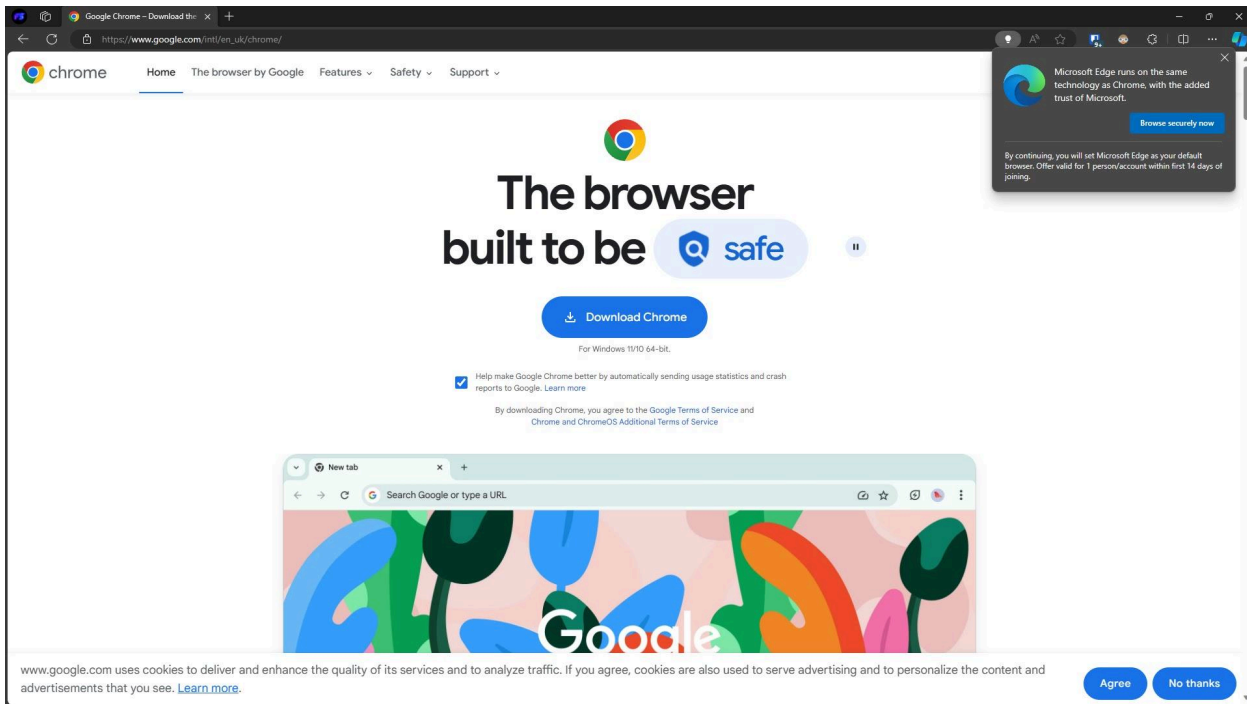
Searching for "browser" in Bing, the default search engine in Microsoft Edge



Searching for "safari" in Bing, the default search engine in Microsoft Edge

Along the same lines, Microsoft has previously [experimented](#) with using its Bing AI answers to partially hide search results for other browsers.

If at this point the user has not already been deterred from installing another browser, they would proceed to click on the web page of a browser vendor. If the user chooses to download Google Chrome, Edge will display another pop-up this time telling the user that *“Microsoft Edge runs on the same technology as Chrome, with the added trust of Microsoft”*.

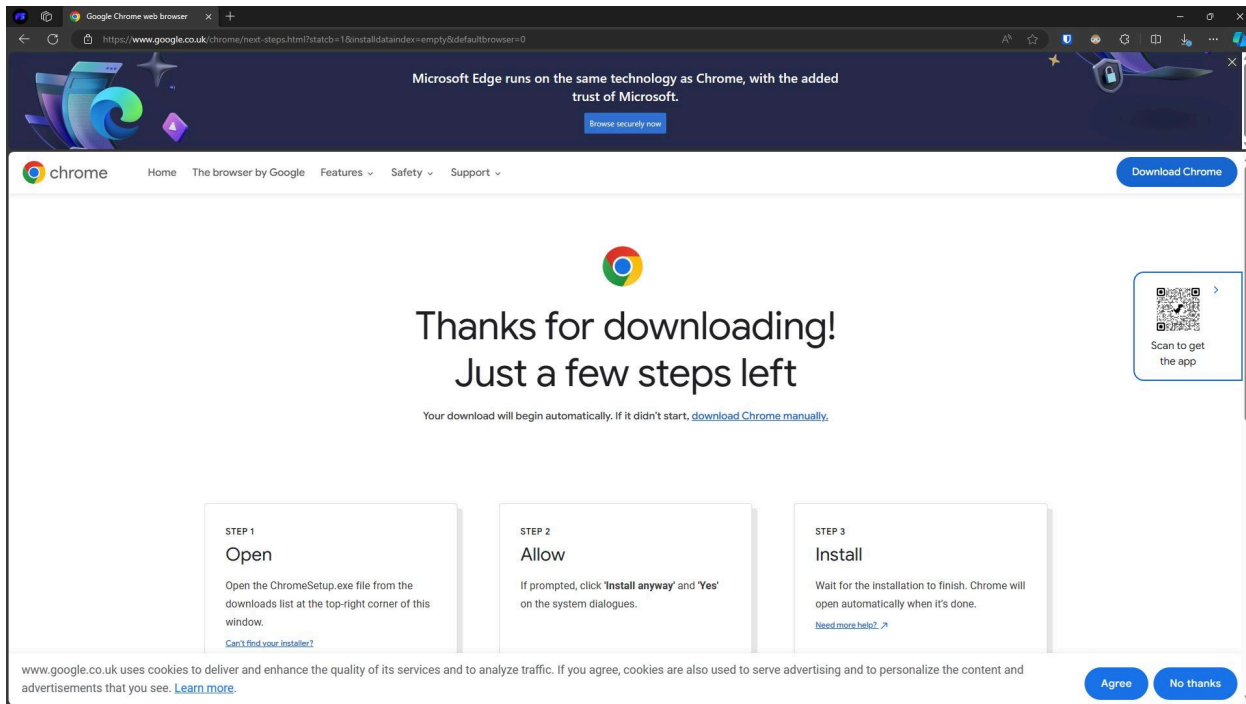


Opening the web page of Google Chrome in Microsoft Edge

Although Chrome is only one browser, [as of December 2025 has a Windows market share of 69.3%](#). This means that this pop-up will appear in the majority of instances when a user is trying to install another browser. If other browsers were to become as popular as Chrome is currently, it would be very feasible for Microsoft to roll out these banners to most other browsers as well, given that all major Windows browsers other than Firefox (6.6% market share) are based on Chromium - meaning the “same technology” message would apply.

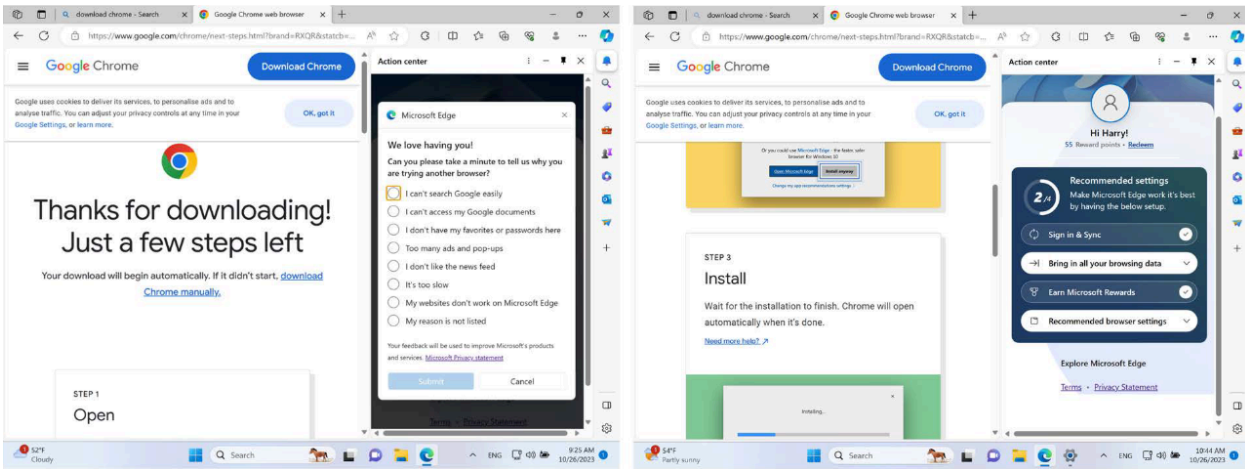
The phrase “with the added trust of Microsoft” seems to be implying that the user should not trust the competing browser they are attempting to install, and may cause people to stop at this point. Users tend to trust the operating system they’re using and so if one of the pre-installed apps is, even indirectly, telling them that something is untrustworthy, they are likely to think twice about using it. Additionally, there seems to be the suggestion of monetary incentive, with the subtext “Offer valid for...”, although clicking on it doesn’t appear to do anything at this point in time.

If despite all of this a user still chooses to download Chrome, yet another pop-up will appear to deter the user from following through with the installation. This pop-up appears across the top of the competing browser vendor's web page and actually causes some of the installation instructions to now be hidden until a user scrolls further down the page.



Pop-up when downloading Google Chrome in Microsoft Edge

Finally, a survey sometimes opens which asks users why they are downloading another browser, and if completed, suggests applying Microsoft's recommended settings to Edge, which include setting it as the default browser. In doing this, Edge shrinks the visible area of the third-party browser's website, in this case hiding the instructions to finish installing that browser.



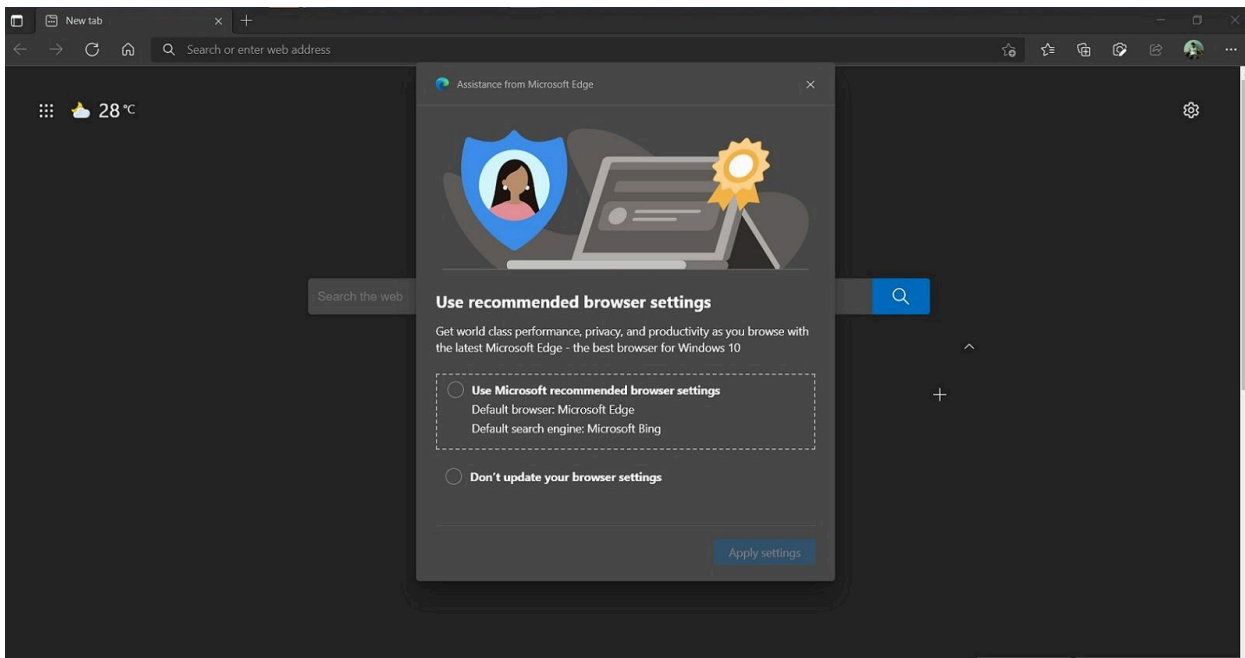
Survey opened by Microsoft Edge when Google Chrome has just been downloaded

None of the banners or pop-ups are spaces that competing browsers are able to access. Even if a browser pays Microsoft for an advert in Bing, that advert will only appear at the top of the list of search results and much less prominently than the Microsoft Edge banner.

4. Recent Past Practices

4.1. One-click browser changing in Edge

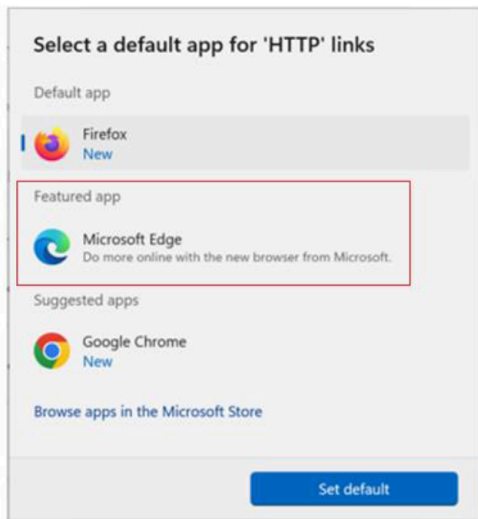
On Windows, Microsoft does not allow third-party apps to set themselves as the default, including for browsers. Despite prohibiting others from doing this, they used to allow Edge to set itself as the default through a “Use Microsoft recommended browser settings” pop-up until [March 2023](#), when they introduced a new system for doing so. Some browsers were able to reverse engineer the setting, but in the case of Google Chrome, Microsoft specifically [blocked this](#) from working. Whilst this specific practice has now been stopped, a very similar one still takes place in Windows, as described in [3.2.1](#)



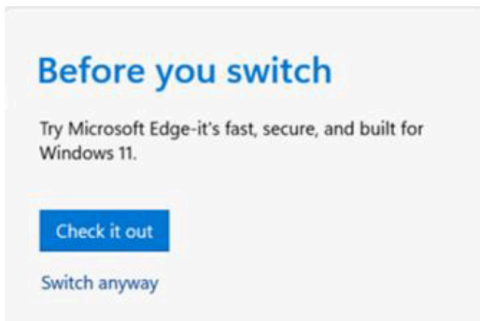
Pop-up when a user opens Edge for the first time in a while, and it is not the default browser. It has since been modified to use the new setting linking system.

4.2. Nudging users away from changing the default browser from Edge

Prior to its first DMA compliance plan, Microsoft tried to dissuade users from choosing a different default browser in settings. First by promoting Microsoft Edge as the “Featured app”:



And then by showing an extra menu encouraging users to try Edge instead of switching



4.3. Microsoft Copilot blocking non-Edge browsers

When the Bing Chat/Microsoft Copilot web app first launched, Microsoft blocked it from working in all other browsers, through user-agent detection. Vivaldi [wrote about](#) this issue in June 2023, describing how they had to [manually tweak](#) Vivaldi to present itself as Microsoft Edge when visiting the Bing Chat site in order to access it. This is despite the fact that Vivaldi, Opera, Chrome, and Edge are all Chromium-based browsers and therefore share the same underlying browser engine. While these browsers can and do differ meaningfully in features, privacy protections, user interface, certain features, and overall user experience, there is little technical basis for treating Edge as uniquely capable of running web apps compared with other Chromium-based browsers.

In 2024, Microsoft decided to make Copilot available in other browsers, but chose to yet again artificially limit them, this time to 4 queries when not signed in with a Microsoft account instead of

the 10 available in Edge. And then in June 2024 they [scrapped](#) the query limit on all browsers, removing any differences in behavior.

Although this is now resolved, it raises the question of why any of it took place. Given the findings by Vivaldi, it seems like there was no technical reason for this to happen, and instead that Microsoft were attempting to use the popularity of their Copilot service to force users into using their browser as well. Should another new popular service come along in the future, there would be nothing stopping them from repeating the same sequence of events.

5. Is Microsoft's Behavior Unlawful?

Because this question arises on a global basis, it is genuinely difficult to answer definitively without expert legal analysis from lawyers with relevant domain expertise in each jurisdiction. That said, a review of the applicable laws outlined below suggests that Microsoft's behavior may well be unlawful in many parts of the world.

In our view, this behavior should be unlawful, due to the harm it causes to competition and by extension consumers, and regulators should take steps to prohibit it.

5.1. The UK's Digital Markets Competition and Consumers Act 2024

This behavior is covered by the UK's DMCCA, if the CMA were to designate Microsoft as having Strategic Market Status (SMS) with respect to Windows.



The CMA may only impose a conduct requirement or a combination of conduct requirements **on a designated undertaking** if it considers that it would be proportionate to do so **for the purposes of** one or more of the following objectives—

- (a) the fair dealing objective,
- (b) **the open choices objective**, and
- (c) the trust and transparency objective,

having regard to what the conduct requirement or combination of conduct requirements is intended to achieve.

[...]

The open choices objective is that users or potential users of the relevant digital activity are able to choose freely and easily between the services or digital content provided by the undertaking and services or digital content provided by other undertakings.

[DMCCA - Section 19](#)

(emphasis added)

The CMA could then set code of conduct requirements prohibiting Microsoft from this and similar behaviors.

5.2. The EU's Digital Markets Act

This is, we believe, in direct opposition to Article 6(3), Article 13(6) and Recital 70 which state:



The gatekeeper shall allow and technically enable end users to easily change default settings on the operating system, virtual assistant and web browser of the gatekeeper that direct or steer end users to products or services provided by the gatekeeper.

[Digital Markets Act - Article 6\(3\)](#)

(emphasis added)



The gatekeeper shall not degrade the conditions or quality of any of the core platform services provided to business users or end users who avail themselves of the rights or choices laid down in Articles 5, 6 and 7, or make the exercise of those rights or choices unduly difficult, including by offering choices to the end-user in a non-neutral manner, or by subverting end users' or business users' autonomy, decision-making, or free choice via the structure, design, function or manner of operation of a user interface or a part thereof.

[Digital Markets Act - Article 13\(6\)](#)

(emphasis added)



Gatekeepers should not engage in behaviour that would undermine the effectiveness of the prohibitions and obligations laid down in this Regulation. Such behaviour includes the design used by the gatekeeper, the presentation of end-user choices in a non-neutral manner, or using the structure, function or manner of operation of a user interface or a part thereof to subvert or impair user autonomy, decision-making, or choice.

[Digital Markets Act - Recital 70](#)

(emphasis added)

Currently Edge is not designated, so behaviors that occur strictly within Edge may not be covered by the DMA. However, such behaviors are cause for Edge to be designated in the future.

Microsoft appears to have stopped most of these behaviors in the EU, including ones not directly covered as Edge is not currently designated.

5.3. The USA's Sherman Act

As outlined in [this section](#), US courts have previously examined similar conduct by Microsoft under the Sherman Act, and Microsoft lost decisively. Although the conduct in the two cases is not identical, in both instances Microsoft used its control over Windows to make switching more difficult and to influence user choice through dark-pattern-like design. This suggests that Microsoft's current conduct likewise would not be considered lawful under the Sherman Act.

5.4. The USA's FTC Act - Section 5

W (1) *Unfair methods of competition in or affecting commerce, and unfair or deceptive acts or practices in or affecting commerce, are hereby declared unlawful.*

[FTC Act - Section 5](#)
(emphasis added)

Under Section 5 of the FTC Act, “*unfair methods of competition*” and “*unfair or deceptive acts or practices*” are unlawful. Microsoft’s conduct can be considered as falling within both categories. By using its control over Windows to make switching more difficult and to steer users toward its own products through dark-pattern-like design, Microsoft is not competing on the merits. Instead, it is using its gatekeeper position to distort user choice and raise barriers to switching. Although notably this law is restricted to commerce within the United States.

5.5. Brazil's Competition Law

W *The acts which under any circumstance have as an objective or may have the following effects shall be considered violations to the economic order, regardless of fault, even if not achieved:*
I - to limit, restrain or in any way injure free competition or free initiative;

[Brazil's Competition Law - Article 36](#)
(emphasis added)

Microsoft's conduct likely contravenes Article 36 of Brazil's Competition Law, as its actions impede user choice and distort user decision-making. The pattern, timing, and asymmetry of these interventions strongly indicate that a central objective and likely effect is to retain and expand Edge's market share on Windows by limiting free competition.

5.6. Germany's Act against Restraints of Competition (GWB)



(1) Any abuse of a dominant position by one or several undertakings is prohibited.

(2) An abuse exists in particular if a dominant undertaking as a supplier or purchaser of a certain type of goods or commercial services

- 1. directly or indirectly impedes another undertaking in an unfair manner or directly or indirectly treats another undertaking differently from similar undertakings without any objective justification;**

[Act against Restraints of Competition \(GWB\)](#)

(emphasis added)

Microsoft's behavior is arguably unlawful under section 19 of the GWB, which prohibits abuse by a dominant undertaking, including the unfair impediment of other undertakings. By using its control over Windows to impede switching, undermine user choice, and disadvantage rival software providers, Microsoft may be unfairly restricting competition without objective justification.

An even stronger case can be made for section 19a:



(1) The Bundeskartellamt may issue a decision declaring that an undertaking which is active to a significant extent on markets within the meaning of Section 18(3a) is of paramount significance for competition across markets. [...]

(2) In the case of a declaratory decision issued pursuant to subsection (1), the Bundeskartellamt may prohibit such undertaking from

- 1. favouring its own offers over the offers of its competitors when mediating access to supply and sales markets, in particular**

a) presenting its own offers in a more favourable manner;

- b) *exclusively pre-installing its own offers on devices or integrating them in any other way in offers provided by the undertaking;*
- 2. **taking measures that impede other undertakings in carrying out their business activities** on supply or sales markets where the undertaking's activities are of relevance for accessing such markets, in particular
 - a) **taking measures that result in the exclusive pre-installation or integration of offers provided by the undertaking;**
 - b) **preventing other undertakings from advertising their own offers** or reaching their purchasers through other channels in addition to those provided or mediated by the undertaking, **or making it more difficult for other undertakings to do so;**
- 3. **directly or indirectly impeding competitors on a market on which the undertaking can rapidly expand its position even without being dominant, in particular**
 - a) **linking the use of an offer provided by the undertaking to the automatic use of another offer provided by the undertaking** which is not necessary for the use of the former offer, without giving the user of the offer sufficient choice as to whether and how the other offer is to be used;

Act against Restraints of Competition (GWB)
(emphasis added)

Following Microsoft's designation under Section 19a(1), the use of Windows to favour Microsoft's own offers through preferential presentation, pre-installation, or integration over rival software is precisely the kind of conduct the Bundeskartellamt may prohibit under 19a.

5.7. Australia's Competition and Consumer Act 2010

Microsoft's conduct may raise serious issues under Australian competition and consumer law.



(1) A corporation that has a substantial degree of power in a market must not engage in conduct that has the purpose, or has or is likely to have the effect, of substantially lessening competition in:

(a) that market; or

*(b) **any other market in which that corporation**, or a body corporate that is related to that corporation:*

*(i) **supplies goods or services**, or is likely to supply goods or services; or*

(ii) supplies goods or services, or is likely to supply goods or services, indirectly through one or more other persons; or

[Australia's Competition and Consumer Act 2010](#)

(emphasis added)



A person must not, in trade or commerce, engage in conduct that is misleading or deceptive or is likely to mislead or deceive.

[Australia's Competition and Consumer Act 2010](#)

(emphasis added)

In this case, the market where Microsoft has substantial power is the Windows operating system. Using the substantial power granted to them by Windows, they are engaging in behavior that is likely to have the effect, and has the likely purpose, of substantially lessening competition in the market for browsers on Windows.

The Australian regulator the ACCC, has further indicated that dark patterns in digital markets will be an area of focus in 2026 and 2027. The ACCC has not made any findings about Microsoft's conduct. However, its stated priorities show that the type of digital-market conduct described in this document falls squarely within the broader competition and consumer-choice concerns the ACCC has publicly identified.



In 2026/27, the ACCC will prioritise manipulative and false practices, and unsafe consumer goods, in digital markets. This priority recognises the emergence of practices including subscription traps and **other dark patterns that manipulate consumer behaviour and unfairly impact consumer choice.**

[ACCC's compliance and enforcement priorities update 2026-27 address](#)

(emphasis added)

5.8. Canada's Competition Act



(1) On application by the Commissioner or a person granted leave under section 103.1, if the **Tribunal finds that one or more persons substantially or completely control a class or species of business throughout Canada** or any area of Canada, it may make an order **prohibiting the person or persons from engaging in a practice or conduct if it finds that the person or persons have engaged in or are engaging in**

(a) **a practice of anti-competitive acts;** or

(b) **conduct**

(i) that had, is having or **is likely to have the effect of preventing or lessening competition** substantially in a market in which the person or persons have a plausible competitive interest, and

(ii) the effect is not a result of superior competitive performance.

[Canada's Competition Act - Section 79](#)

(emphasis added)

Canada's competition law may therefore provide a basis for prohibiting the practices described in this document. The relevant class or species of business may be desktop operating systems in Canada, and Microsoft has a plausible competitive interest in the adjacent browser market through Edge.

6. DOJ vs Microsoft Case

In the late 1990s, Microsoft grew increasingly concerned that middleware could erode the Windows “applications barrier to entry”. [We have written about this case before from the perspective of API access](#) being denied to browsers, but defaults were also an important component of this case.

The court found that Microsoft repeatedly undermined defaults and also pressured other parties to set Internet Explorer as the default by refusing to sell them other products if they did not.

For example, it was ignoring what the set default browser was in many instances:

W *The second way in which Microsoft's engineers implemented Allchin's strategy was to **make Windows 98 override the user's choice of default browser in certain circumstances**. As shipped to users, Windows 98 has Internet Explorer configured as the default browser. While Windows 98 does provide the user with the ability to choose a different default browser, **it does not treat this choice as the "default browser" within the ordinary meaning of the term**. Specifically, when a user chooses a browser other than Internet Explorer as the default, **Windows 98 nevertheless requires the user to employ Internet Explorer in numerous situations that, from the user's perspective, are entirely unexpected**. As a consequence, users who choose a browser other than Internet Explorer as their default face considerable uncertainty and confusion in the ordinary course of using Windows 98.*

[US vs Microsoft - Finding of Fact](#)
(emphasis added)

This was, the court indicated, part of a deliberate strategy:

W **Microsoft's refusal to respect the user's choice of default browser** fulfilled Brad Chase's 1995 promise to **make the use of any browser other than Internet Explorer on Windows "a jolting experience."** By increasing the likelihood that using Navigator on Windows 98 would have unpleasant consequences for users, Microsoft further diminished the inclination of OEMs to pre-install Navigator onto Windows. **The decision to override the user's selection of non- Microsoft software as the default browser also directly disinclined Windows 98 consumers to use Navigator as their default browser,**

and it harmed those Windows 98 consumers who nevertheless used Navigator. In particular, Microsoft exposed those using Navigator on Windows 98 to security and privacy risks that are specific to Internet Explorer and to ActiveX controls.

[US vs Microsoft - Finding of Fact](#)
(emphasis added)

Microsoft also compelled Apple to set Internet Explorer as the default on macOS by tying it with Office:



*Apple increased its distribution and promotion of Internet Explorer not because of a conviction that the quality of Microsoft's product was superior to Navigator's, or that consumer demand for it was greater, but rather because of the in terrorem effect of the prospect of the loss of Mac Office. **To be blunt, Microsoft threatened to refuse to sell a profitable product to Apple**, a product in whose development Microsoft had invested substantial resources, and which was virtually ready for shipment. Not only would this ploy have wasted sunk costs and sacrificed substantial profit, it also would have damaged Microsoft's goodwill among Apple's customers, whom Microsoft had led to expect a new version of Mac Office.*

***The predominant reason Microsoft was prepared to make this sacrifice, and the sole reason that it required Apple to make Internet Explorer its default browser and restricted Apple's freedom to feature and promote non- Microsoft browsing software, was to protect the applications barrier to entry.** More specifically, the requirements and restrictions relating to browsing software were intended to raise Internet Explorer's usage share, to lower Navigator's share, and more broadly to demonstrate to important observers (including consumer, developers, industry participants, and investors) that Navigator's success had crested.*

[US vs Microsoft - Finding of Fact](#)
(emphasis added)

The court found this likely meaningfully impacted Internet Explorer's share beyond what it would have achieved under fair competition:



Not surprisingly, **the inducements that Microsoft gave out and the restrictions it conditioned them upon have resulted in a substantial increase in Internet Explorer's usage share.** A study Microsoft conducted shows that at the end of 1997, **Internet Explorer enjoyed a ninety-four percent weighted average share of shipments of browsing software by ISPs that had agreed to make Internet Explorer their default browser.** By contrast, the study shows that **Internet Explorer had only a fourteen percent weighted average share of shipments of browsing software by ISPs that had not agreed to make Internet Explorer their default browser.** The same study shows that Microsoft's weighted average share of browser usage by subscribers to ISPs that had made Internet Explorer their default browser was over sixty percent at the end of 1997, whereas its weighted average share of browser usage by subscribers to ISPs that did not make Internet Explorer their default browser was less than twenty percent.

[US vs Microsoft - Finding of Fact](#)
(emphasis added)

Internet Explorer was eventually discontinued after rival browsers were able to compete on Windows by merit. That competition would likely have been impossible if Microsoft had been permitted to deny competing browsers the APIs and platform access they needed to function effectively. Yet Microsoft now appears to be reviving similar tactics by undermining users' choice of default browser, steering users to set Edge as the default, and discouraging them from switching away from Edge. This undermines browser competition on Windows, with particularly harmful effects on smaller browsers that cannot afford to lose significant market share. Reduced competition ultimately leads to worse outcomes for consumers.

7. Does Google Compete Fairly for Chrome Market Share?

In this context, it is worth asking whether Google competes for Chrome's market share entirely on the merits, or whether it uses its existing properties to boost Chrome in ways that are not available to competitors.

To be clear, Google's investment in Chrome and the underlying Chromium project is not, by itself, a valid criticism. That is competition on the merits. It has also produced significant benefits for a vast ecosystem of Chromium-based browsers and web projects. We [have written extensively about the value this investment brings](#).

The concern is different, it is whether Google unfairly uses its control over major online properties and distribution channels to steer users toward Chrome.

7.1. Promotion via Google's Online Properties

Google's use of online properties such as Google Search, Gmail, Google Docs, Google News, Google Translate, YouTube, and the Chrome Web Store to promote Chrome to users of rival browsers is concerning.

In some cases, a service may have a legitimate reason to recommend a particular browser. For example, a site may depend on a browser API that is not available in all browsers. But even in those cases, the service should be transparent about the specific compatibility issue, identify the missing API or feature, allow users to attempt to continue with their preferred browser where practical, and remove such messages for any browser that implements the required functionality.

Google and Microsoft have a bit of a complicated relationship. Sometimes, the two companies collaborate for the better. Other times, they use questionable tactics to try and steal users of each other's products. In the latest example of the latter, Google is pushing users of Microsoft's new Chromium-based Edge browser over to Chrome by using most of its online services.

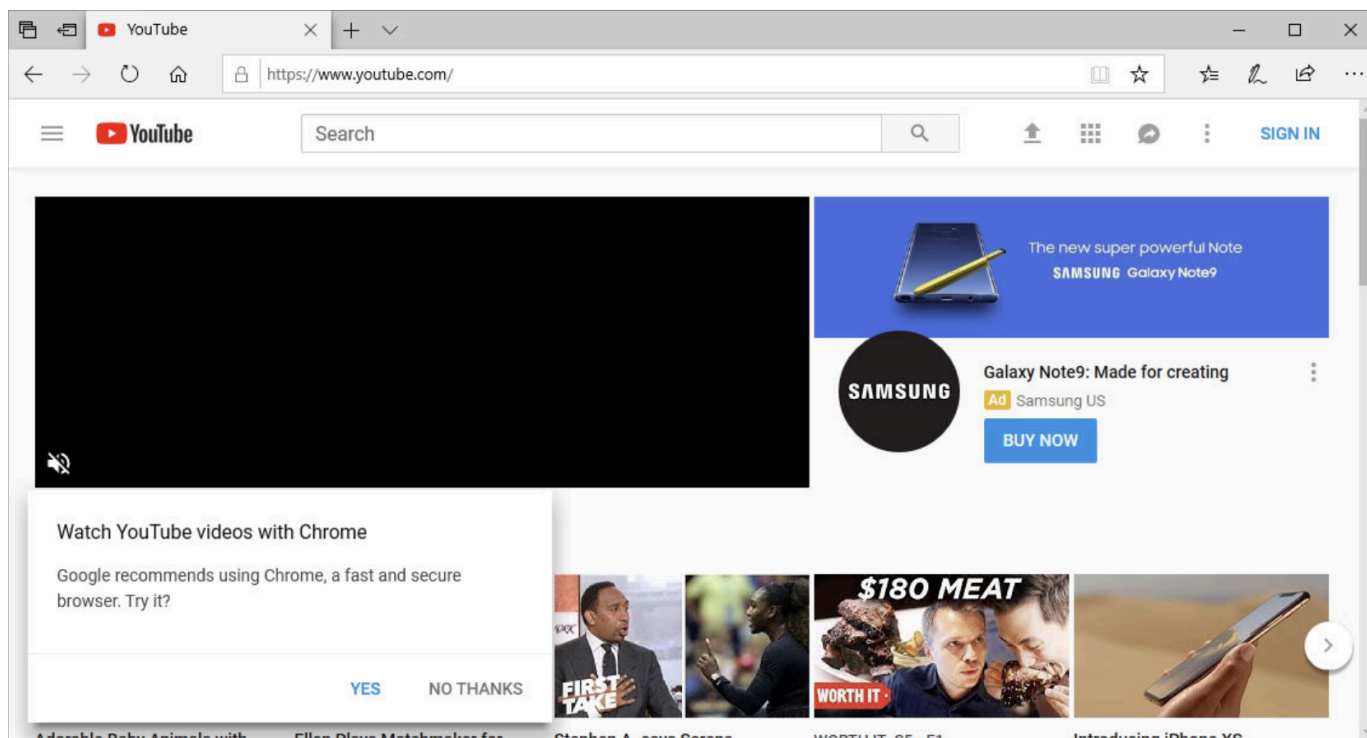
[Ben Schoon - 9to5Google](#)

BleepingComputer has documented similar behavior:

While not as in your face as this new Edge test, Google has been known to promote Chrome when you visit their sites using a competing browser.

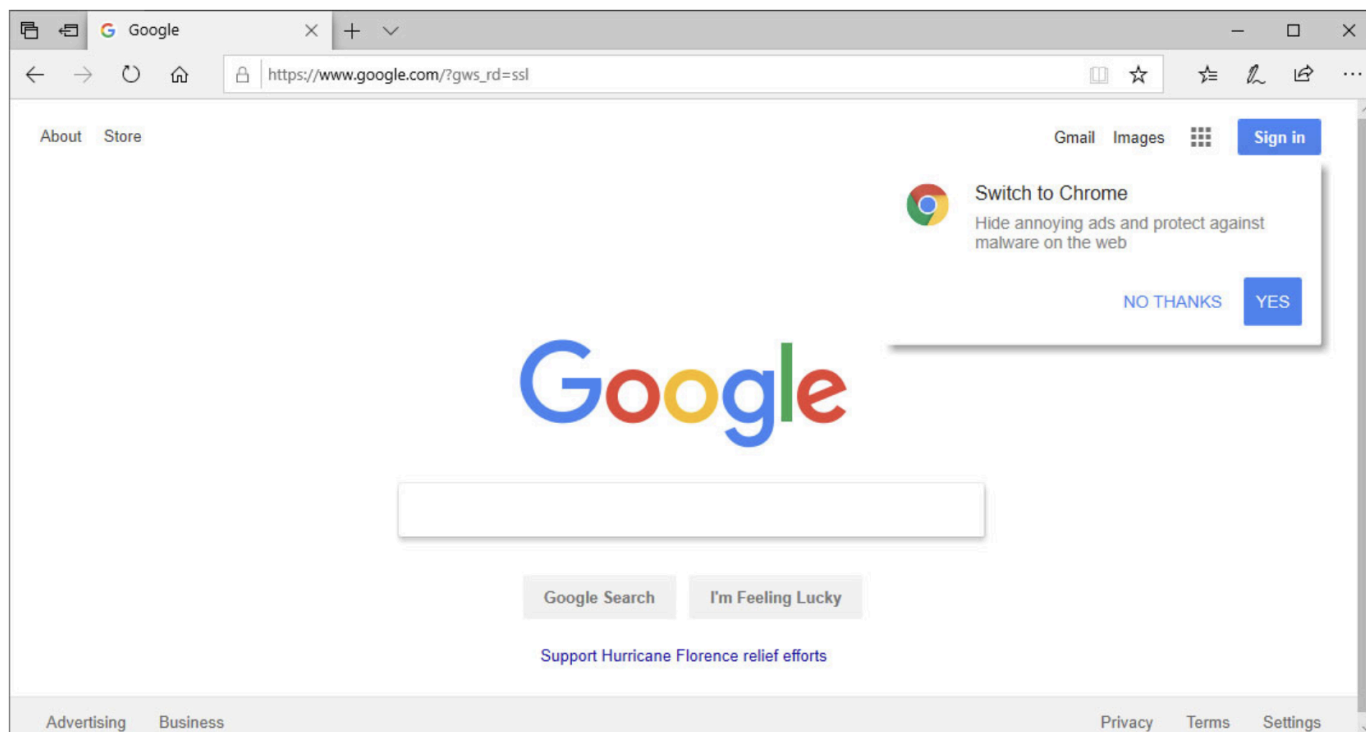
For example, when visiting Google.com using Edge, you will see dialog boxes that make statements like "Switch to Chrome. Hide annoying ads and protect against malware on the web."

[Lawrence Abrams - Bleeping Computer](#)



YouTube prompt asking users to switch to Chrome (Displayed in Edge - 2018)

[Source: Bleeping Computer](#)



Google prompt asking users to switch to Chrome (Displayed in Edge - 2018)

[Source: Bleeping Computer](#)

The Edge example is particularly difficult to justify on technical grounds because Edge is itself Chromium-based. If the relevant Google service works in Chrome, there is unlikely to be a general browser-engine incompatibility that justifies urging the user to switch. Nor, in these examples, does Google appear to document the specific functionality that is missing or explain why Chrome is required.

Even where non-Chromium browsers such as Firefox are involved, prompting switches should be limited to cases where an API is missing or functionality is broken. This should also be clearly documented.

A reasonable example would be a website that requires a particular browser capability, such as a Web Bluetooth controller for toys or hardware accessories. In that case, it is fair for the site to tell users that their current browser does not support the required API and to recommend browsers that do. This approach gives other browser vendors clear information about what they would need to support in order to provide compatibility and does not override the user's choice of browser.

By contrast, using dominant online services to display generic “switch to Chrome” prompts risks shifting browser market share through Google’s control of adjacent products rather than through Chrome’s own merits.

7.2. Placement via MADA

One can also reasonably argue that Google Chrome’s dominance on Android is reinforced by its complex revenue-sharing and placement arrangements with device manufacturers.

The UK Competition and Markets Authority has examined Google’s agreements with device manufacturers and app developers, including arrangements concerning app placement, pre-installation, and revenue sharing.

“However, we consider that these agreements create significant financial incentives for manufacturers not only to pre-install Google Search and Chrome, but also to grant those apps alongside the Play Store, prominent placement, a default status and, in some cases, ensuring that no similar services are preloaded on the device.”

[CMA - Google’s agreements with device manufacturers and app developers](#)

7.3. Does This Excuse Microsoft’s Behavior?

No, Microsoft has also used aggressive and sometimes misleading tactics to promote Edge. Google’s behavior does not excuse Microsoft’s, and Microsoft’s behavior does not excuse Google’s.

The straightforward regulatory solution is to prohibit both sets of conduct.

Browser vendors should be free to advertise, improve their products, and explain real technical compatibility issues. But dominant platform owners should not use control over operating systems, search engines, email services, productivity tools, video platforms, or app stores to pressure users into adopting their own browser.

That would force both Microsoft and Google to compete more directly on the merits. That is quality, performance, privacy, security and many other aspects of genuine browser competition.

8. Market Share Is No Defence

[On Windows in December 2025](#), Chrome accounted for 69.3% of browser usage, followed by Edge at 18.5%, Firefox at 6.6%, Opera at 2.7%, and Brave at 1.6%. All remaining browsers together made up about 1% of the market.

These statistics may underestimate Edge's share. Microsoft's own statements to investors tell a different story. In its FY2025 Q2 earnings call, [Satya Nadella told investors that "Edge surpassed 30% market share in the US on Windows" and had "taken share for 15 consecutive quarters"](#). In its FY2026 Q3 earnings materials, [Microsoft again told investors that Edge had "taken share for 20 consecutive quarters," while Bing monthly active users had reached 1 billion for the first time](#).

One could hypothetically make the argument that these attempts by Windows to override the user's chosen browser, to push users to use Edge and to make it more difficult for users to change default browsers are acceptable if they are used against Chrome which has a dominant market share on Windows. Clearly these arguments hold no weight when Microsoft uses such strategies against browsers with smaller market share such as Firefox, Opera, Vivaldi and Brave.

Even restricted to Chrome this argument needs to be examined.

Unlike on Android, where Chrome's position is reinforced by Google's [complex revenue-sharing and placement arrangements with device manufacturers](#), Windows presents a different picture. Windows ships with Edge installed and set as the default browser. Users who want Chrome must generally download it, install it, and set it as the default themselves, often using Edge to do so. Chrome's significant market share on Windows is therefore strong evidence that it competes successfully on the merits. But as discussed [in the previous section](#), this does not mean every source of Chrome's market share is merit-based. Google's use of Search, Gmail, Docs, YouTube, and other online properties to promote Chrome remains a concern.

On Windows, Microsoft already enjoys the enormous structural advantage of owning the operating system, preinstalling Edge, and setting it as the default browser out of the box. Anyone who wants to use Chrome must first download it, install it, and then change their defaults, usually by using Edge to do so. This matters because it shows Chrome's position on Windows was not handed to it, it was won despite Microsoft's privileged position at the operating-system layer.

There are a few arguments as to why these forms of self-preferencing by Microsoft are not acceptable.

8.1. Competition on Merit

First, Microsoft is not winning consumers purely on merit or the quality of its browser. Rather, it is using non-neutral design choices, switching friction, and privileged Windows integration to steer users toward Edge. Even apart from the measurable effectiveness of these strategies, their nature should be criticised. This is not how a competitor should gain market share, particularly where that competitor already benefits from control of the operating system, preinstallation, and default status.

W *Microsoft's determined efforts to beat back that threat, and thus keep the entry barrier high, **not by simply offering consumers improved or more easily available products, but by a host of costly exclusionary actions** that both directly and indirectly limited consumer choices; and **Microsoft's substantial success in limiting browser and other middleware competition** and thus in preserving the entry barrier that protects its monopoly power.*

[Plaintiffs' Joint Proposed Conclusions Of Law : U.S. V. Microsoft Corporation](#)
(emphasis added)

8.2. Antitrust and Competition Law

Second, it's not clear that this line of argument has any basis in law. There doesn't appear to be any major antitrust cases where anti-competitive conduct was accepted simply because another rival firm has larger market share.

For example, in U.S. v. Apple, the Second Circuit expressly rejected the notion that the presence of a powerful rival can justify horizontal collusion that would otherwise be unlawful.

W *Significantly, the dissent agrees that **Apple intentionally organized a conspiracy among the Publisher Defendants to raise ebook prices**. Nonetheless, it contends that **Apple was entitled to do so** because the conspiracy helped it become an ebook retailer. **In arriving at this startling conclusion** — based in large measure on an argument that Apple itself did not assert — **the dissent makes two fundamental errors**. [...]*

*More fundamentally, the dissent's theory — that **the presence of a strong competitor justifies a horizontal price-fixing conspiracy** — endorses a concept of marketplace*

vigilantism that is wholly foreign to the antitrust laws. By organizing a price-fixing conspiracy, Apple found an easy path to opening its iBookstore, but it did so by ensuring that market-wide ebook prices would rise to a level that it, and the Publisher Defendants, had jointly agreed upon. Plainly, competition is not served by permitting a market entrant to eliminate price competition as a condition of entry...

[U.S. v. Apple \(2d Cir. 2015\)](#)

(emphasis added)

That conclusion is also consistent with a longstanding antitrust principle: typically the law does not recognise a defense based on the premise that competition itself is unreasonable.



In sum, the Rule of Reason does not support a defense based on the assumption that competition itself is unreasonable. Such a view of the Rule would create the "sea of doubt" on which Judge Taft refused to embark in *Addyston*, and which this Court has firmly avoided ever since.

[National Society of Professional Engineers v. United States](#)

(emphasis added)

A related distinction appears in EU case law. In *Google and Alphabet v Commission* (Google Shopping), the General Court emphasised that Google's dominant position, even one "on the scale of Google's" was not itself objectionable. What rendered the conduct unlawful was that Google departed from competition on the merits by favouring its own comparison shopping service through more favourable display and positioning:



First of all, the General Court considers that an undertaking's dominant position alone, even one on the scale of Google's, is not a ground of criticism of the undertaking concerned, even if it is planning to expand into a neighbouring market. However, the General Court finds that, by favouring its own comparison shopping service on its general results pages through more favourable display and positioning, while relegating the results from competing comparison services in those pages by means of ranking algorithms, Google departed from competition on the merits.

[Google and Alphabet v Commission \(Google Shopping\)](#)

(emphasis added)

8.3. Respecting User Choice

Third, it is hard to defend the idea that a company should be permitted to undermine an explicit user choice. Edge already starts with the overwhelming advantage of being bundled, preinstalled, and set as default. If Microsoft still struggles to gain share, that is a commercial problem to solve through product improvement, not a justification for overriding users' decisions. One plausible explanation is historical: years of neglect under Internet Explorer badly damaged Microsoft's browser reputation. Internet Explorer once dominated browser usage, but due to continuously declining usage, the brand name was retired and replaced with Edge. That is unfortunate for Microsoft, but it does not entitle it to substitute coercion for competition.

This is also directly covered by the Digital Markets Act:



*Gatekeepers should not engage in behaviour that would undermine the effectiveness of the prohibitions and obligations laid down in this Regulation. Such behaviour includes the design used by the gatekeeper, **the presentation of end-user choices in a non-neutral manner, or using the structure, function or manner of operation of a user interface or a part thereof to subvert or impair user autonomy, decision-making, or choice.***

[Digital Markets Act - Recital 70](#)

(emphasis added)



*The gatekeeper shall not degrade the conditions or quality of any of the core platform services provided to business users or end users who avail themselves of the rights or choices laid down in Articles 5, 6 and 7, or make the exercise of those rights or choices unduly difficult, **including by offering choices to the end-user in a non-neutral manner, or by subverting end users' or business users' autonomy, decision-making, or free choice via the structure, design, function or manner of operation of a user interface or a part thereof.***

[Digital Markets Act - Article 13\(6\)](#)

(emphasis added)

This is also covered by the UK's DMCCA, if the CMA were to designate Microsoft as having SMS status with respect to Windows and Edge.



The CMA may only impose a conduct requirement or a combination of conduct requirements **on a designated undertaking** if it considers that it would be proportionate to do so **for the purposes of** one or more of the following objectives—

- (a) the fair dealing objective,
- (b) **the open choices objective**, and
- (c) the trust and transparency objective,

having regard to what the conduct requirement or combination of conduct requirements is intended to achieve.

[...]

The open choices objective is that users or potential users of the relevant digital activity are able to choose freely and easily between the services or digital content provided by the undertaking and services or digital content provided by other undertakings.

[DMCCA - Section 19](#)

(emphasis added)

8.4. Impact on Smaller Browsers

Finally, it seems reasonable to assume that these tactics would be most successful against smaller browsers that have less brand recognition than Chrome. A user who is already familiar with Chrome may be more willing to ignore Microsoft's warnings, banners, or prompts in order to install it. But where the user is less familiar with the competing browser, or less certain about whether they should trust it, even a relatively small nudge may be enough to deter them from downloading it, setting it as default, or continuing to use it.

This matters because competition is not only harmed when conduct affects the largest rival. Smaller browsers are often the ones trying to differentiate through privacy protections, new features, different user interfaces, or alternative business models. They are also the browsers least able to absorb the loss of users caused by Microsoft placing friction in the way of switching. Conduct that may divert only a modest percentage of users in absolute terms can therefore have a much greater competitive impact on smaller rivals, precisely because they start from a lower base and have fewer opportunities to recover those users elsewhere.

In this way, Microsoft's conduct risks distorting not just competition between Edge and Chrome, but competition across the browser market as a whole. A platform owner that controls the operating system can use seemingly minor interventions at the moment of download, installation, or default-browser switching to skew outcomes in favour of its own browser. When those interventions are applied to smaller browsers, the effect is especially harmful because they can prevent rivals from ever reaching the scale needed to become meaningful competitive constraints.

For those reasons, we reject the idea that Microsoft should be allowed to engage in this behavior even against a rival with a larger market share. Even if regulators were somehow prepared to tolerate some of this conduct against Chrome, and it is far from obvious why they should, at a minimum Microsoft must stop using these tactics against smaller browsers altogether. A rule that permits platform interference whenever their own share is not the majority would not protect competition; it would only protect the platform owner's ability to distort user choice and to suppress the smaller competitors most in need of that choice being respected.

9. Recommendations

The evidence set out in this report demonstrates a consistent pattern of behavior by Microsoft that undermines effective browser competition on Windows. These practices are not isolated design choices but form an interconnected system of friction, nudging, and technical restriction that steers users toward Microsoft Edge while making it more difficult to use competing browsers. Even where individual elements may appear minor in isolation, their cumulative effect is to raise switching costs, distort user choice, and expand Microsoft's browser market share at the expense of rivals, consumers and businesses.

In particular, we believe regulators should:

- Require that changing the default browser is a single, clear action that applies to all relevant file types and protocols.
- Prohibit the use of dark patterns, including pre-selected options, scare screens, and misleading prompts that steer users toward Microsoft's own browser.
- Mandate that all system components and Microsoft applications respect the user's chosen default browser, with no bypass mechanisms such as proprietary protocols.
- Ensure fair and equal treatment of competing browsers in Windows features such as search, widgets, and installation flows.

10. Toward a Brighter Future

Strong browser competition is critical because the Web is one of the most important economic and technological platforms in the world. It underpins vast amounts of global commerce, communication, and innovation, generating enormous consumer and business value. The pace of progress on the web across performance, security, and new capabilities depends directly on browsers competing to improve. When that competition is weakened by anti-competitive conduct, the impact is not limited to browser vendors, but extends across the entire digital web economy. Ensuring fair competition in browsers is therefore not a narrow technical issue, but a matter of broad economic importance.

We believe browsers should compete on merit and not via using the control of large platforms to undermine user choice. We hope that the CMA considers including Edge in its definition of Microsoft's Business Software Ecosystem and then uses the powers granted to them to fix each of the described behaviors.

OWA believes competition, not walled gardens, leads to the brightest future for consumers, businesses, and the digital ecosystem.



11. References

1. **We also do not see Edge’s comparably smaller share of the browser market on Windows as a defense** (Cited: [A](#))
[?tab=t.0#heading=h.7qhi53o4s8kb](#)
2. **Microsoft - Blog** (Cited: [A](#) & [B](#))
<https://www.microsoft.com/en-us/microsoft-365/blog/2020/08/04/revisit-idea-modern-browser/>
3. **makes all web pages 1ms faster saves 300 years of wasted human time per year** (Cited: [A](#))
[?tab=t.0#heading=h.tn0tqg1mx7br](#)
4. **have had** (Cited: [A](#))
<https://blog.mozilla.org/en/uncategorized/quick-as-a-fox-firefox-keeps-getting-faster/>
5. **significant improvements** (Cited: [A](#))
https://blog.chromium.org/2018/09/10-years-of-speed-in-chrome_11.html
6. **porting of the full version of Photoshop to run in a browser** (Cited: [A](#))
<https://medium.com/@addyosmani/photoshop-is-now-on-the-web-38d70954365a>
7. **using WebAssembly technologies** (Cited: [A](#))
<https://webassembly.org/>
8. **estimated that the Internet’s consumer surplus in the United States amounted to about 40% of GDP, or roughly** (Cited: [A](#))
<https://intheblack.cpaaustralia.com.au/economy/how-much-is-the-internet-worth>
9. **US\$8 trillion** (Cited: [A](#))
<https://intheblack.cpaaustralia.com.au/economy/how-much-is-the-internet-worth>
10. **annually** (Cited: [A](#))
<https://intheblack.cpaaustralia.com.au/economy/how-much-is-the-internet-worth>
11. **Removing the one-click default browser setting for a range of file types** (Cited: [A](#))
[?tab=t.0#heading=h.hbgpbl2buwtf](#)
12. **Scare screens in Windows to push users to switch back to Edge** (Cited: [A](#))
[?tab=t.0#heading=h.aluagzokl8cc](#)
13. **Restricting Windows Search results for terms such as ‘internet’ to Edge** (Cited: [A](#))
[?tab=t.0#heading=h.fj52vp6xl4b](#)
14. **Hardcoding multiple Microsoft apps to use Edge using microsoft-edge:// links** (Cited: [A](#))
[?tab=t.0#heading=h.1xry74kzmi6g](#)
15. **Scare screens in Bing to discourage downloading a different browser** (Cited: [A](#))
[?tab=t.0#heading=h.atlef0n1e1ju](#)
16. **Popups and injected scare dialogs in Edge to discourage downloading a different browser** (Cited: [A](#))

[?tab=t.0#heading=h.atlef0n1e1ju](#)

17. **Non-neutral browser selection settings interface** (Cited: [A](#))
[?tab=t.0#heading=h.n8ag6tpnwyor](#)
18. **Preventing competing browsers from one-click default browser changing** (Cited: [A](#))
[?tab=t.0#heading=h.pe12q0lxzqfd](#)
19. **Microsoft Copilot blocking non-Edge browsers** (Cited: [A](#))
[?tab=t.0#heading=h.8v9zhl52c5zv](#)
20. **an independent expert report by Dr. Harry Brignull and Cennydd Bowles** (Cited: [A](#))
<https://research.mozilla.org/files/2024/01/Over-the-Edge-Report-January-2024.pdf>
21. **Over The Edge - How Microsoft's Design Tactics Compromise Free Browser Choice** (Cited: [A](#))
<https://research.mozilla.org/files/2024/01/Over-the-Edge-Report-January-2024.pdf>
22. **UK's Digital Markets Competition and Consumers Act 2024** (Cited: [A](#))
[?tab=t.0#heading=h.oipbc8tyi5o](#)
23. **the EU's Digital Markets Act** (Cited: [A](#))
[?tab=t.0#heading=h.tat0bq5afhlc](#)
24. **the USA's Sherman Act** (Cited: [A](#))
[?tab=t.0#heading=h.jaz2hmf7q5mp](#)
25. **FTC Act - Section 5** (Cited: [A](#))
[?tab=t.0#heading=h.eeiv2cdu7lv0](#)
26. **Brazil's Competition Law** (Cited: [A](#))
[?tab=t.0#heading=h.jlep96jw56az](#)
27. **Germany's Act against Restraints of Competition (GWB)** (Cited: [A](#))
[?tab=t.0#heading=h.7e5gjpuxh4gk](#)
28. **Australia's Competition and Consumer Act 2010** (Cited: [A](#))
[?tab=t.0#heading=h.w3z60da0slqc](#)
29. **Canada's Competition Act** (Cited: [A](#))
[?tab=t.0#heading=h.180jm46ib1p3](#)
30. **CMA - Invitation to comment** (Cited: [A](#), [B](#), [C](#), [D](#), [E](#) & [F](#))
https://assets.publishing.service.gov.uk/media/6a0495ca97000cb6073e4d8f/Invitation_to_comment.pdf
31. **Microsoft describes Edge for Business as** (Cited: [A](#))
<https://www.microsoft.com/en-gb/edge/business/ai-browsing?form=MA13FJ>
32. **Microsoft - Promotional Materials** (Cited: [A](#))
<https://www.microsoft.com/en-gb/edge/business/ai-browsing?form=MA13FJ>
33. **early 2000s US Microsoft case** (Cited: [A](#))
[?tab=t.0#heading=h.6mzzlj6y1sm3](#)

34. **to Apple** (Cited: [A](#))
<https://open-web-advocacy.org/blog/apple-adopts-6-owa-choice-architecture-recommendations/>
35. **and Google** (Cited: [A](#))
<https://open-web-advocacy.org/blog/google-backs-down--will-grant-hotseat-in-eu-browser-choice-screen/>
36. **a brief analysis on why Microsoft's behavior may be unlawful in other jurisdictions** (Cited: [A](#))
<https://open-web-advocacy.org/?tab=t.0#heading=h.u75r26whame6>
37. **often** (Cited: [A](#))
<https://www.windowslatest.com/2024/04/29/windows-11-is-again-using-full-screen-pop-ups-to-promote-microsoft-edge/>
38. **included** (Cited: [A](#))
<https://www.windowslatest.com/2020/11/15/windows-10-is-now-nagging-users-with-microsoft-edge-recommendations/>
39. **force Windows users** (Cited: [A](#))
<https://www.theverge.com/21310611/microsoft-edge-browser-forced-update-chromium-editorial>
40. **users** (Cited: [A](#))
<https://www.theverge.com/24054329/microsoft-edge-automatic-chrome-import-data-feature>
41. **to** (Cited: [A](#))
<https://www.theverge.com/24054329/microsoft-edge-automatic-chrome-import-data-feature>
42. **auto-import browser data** (Cited: [A](#))
<https://www.theverge.com/24054329/microsoft-edge-automatic-chrome-import-data-feature>
43. **further subverting the user's choice of default browser** (Cited: [A](#))
<https://web.archive.org/web/20260609221718/https://www.theverge.com/2024/11/12/24294454/microsoft-edge-chrome-tabs-prompt-trick>
44. **been** (Cited: [A](#))
<https://www.theverge.com/2023/8/30/23851902/microsoft-bing-popups-windows-11-malware>
45. **reported** (Cited: [A](#))
<https://www.theverge.com/2024/3/15/24101887/microsoft-bing-popups-windows-11-google-chrome>
46. **itself** (Cited: [A](#))
<https://blogs.windows.com/windowsexperience/2023/03/17/a-principled-approach-to-app-pinning-and-app-defaults-in-windows/>
47. **rolled out** (Cited: [A](#))
<https://www.ctrl.blog/entry/microsoft-edge-protocol-competition.html>
48. **update** (Cited: [A](#))
<https://www.theverge.com/2021/11/15/22782802/microsoft-block-edgedeflector-windows-11>
49. **expanded** (Cited: [A](#))
<https://www.theverge.com/2023/5/3/23709297/microsoft-edge-force-outlook-teams-web-links-open>
50. **use** (Cited: [A](#))

<https://support.microsoft.com/en-gb/topic/web-links-from-outlook-emails-and-teams-chats-open-in-microsoft-edge-b0e1a1c1-bd62-462c-9ed5-5938b9c649f0?form=MT00D7>

51. **Android & iOS versions of these apps** (Cited: [A](#))
<https://support.microsoft.com/en-us/office/choosing-how-you-want-to-open-links-in-outlook-mobile-apps-a39a7731-2ebc-406b-9575-eea7f28fa6ac>
52. **Windows Defender** (Cited: [A](#))
https://www.theregister.com/2024/08/14/microsoft_edge_promotion_in_defender/
53. **for other search terms** (Cited: [A](#))
https://www.theregister.com/2024/08/14/microsoft_edge_promotion_in_defender/?tab=t.0#heading=h.xweru965yqt
54. **experimented** (Cited: [A](#))
<https://www.theverge.com/2023/6/6/23736289/microsoft-bing-chrome-search-fake-ai-chatbot>
55. **as of** (Cited: [A](#))
<https://radar.cloudflare.com/reports/browser-market-share-2025-q4>
56. **December 2025** (Cited: [A](#))
<https://radar.cloudflare.com/reports/browser-market-share-2025-q4>
57. **has a Windows market share of 69.3%** (Cited: [A](#))
<https://radar.cloudflare.com/reports/browser-market-share-2025-q4>
58. **March 2023** (Cited: [A](#))
<https://blogs.windows.com/windowsexperience/2023/03/17/a-principled-approach-to-app-pinning-and-app-defaults-in-windows/>
59. **blocked this** (Cited: [A](#))
<https://gizmodo.com/microsoft-windows-google-chrome-feature-broken-edge-1850392901>
60. **3.2.1** (Cited: [A](#))
<https://gizmodo.com/microsoft-windows-google-chrome-feature-broken-edge-1850392901?tab=t.0#heading=h.aluagzokl8cc>
61. **wrote** (Cited: [A](#))
<https://vivaldi.com/blog/vivaldi-on-desktop-6-1/>
62. **about** (Cited: [A](#))
<https://vivaldi.com/blog/vivaldi-on-android-6-1/>
63. **manually tweak** (Cited: [A](#))
<https://vivaldi.com/wp-content/uploads/Vivaldi-Open-Letter-Microsoft-DMA-Comp.pdf>
64. **scrapped** (Cited: [A](#))
<https://mspoweruser.com/microsoft-lifts-free-copilot-daily-limit-rolling-out-amidst-buzz-over-paid-copilot-pro-plan/>
65. **DMCCA - Section 19** (Cited: [A](#) & [B](#))
<https://www.legislation.gov.uk/ukpga/2024/13/section/19>
66. **Digital Markets Act - Article 6(3)** (Cited: [A](#))
https://eur-lex.europa.eu/legal-content/EN/TXT/?toc=OJ%3AL%3A2022%3A265%3ATOC&uri=uriserv%3AOJ.L_.2022.265

[.01.0001.01.ENG](#)

67. **Digital Markets Act - Article 13(6)** (Cited: [A](#) & [B](#))
https://eur-lex.europa.eu/legal-content/EN/TXT/?toc=OJ%3AL%3A2022%3A265%3ATOC&uri=uriserv%3AOJ.L_2022.265_01.0001.01.ENG
68. **Digital Markets Act - Recital 70** (Cited: [A](#) & [B](#))
https://eur-lex.europa.eu/legal-content/EN/TXT/?toc=OJ%3AL%3A2022%3A265%3ATOC&uri=uriserv%3AOJ.L_2022.265_01.0001.01.ENG
69. **this** (Cited: [A](#))
[?tab=t.0#heading=h.6mzzlj6y1sm3](https://www.federalregister.gov/?tab=t.0#heading=h.6mzzlj6y1sm3)
70. **section** (Cited: [A](#))
[?tab=t.0#heading=h.6mzzlj6y1sm3](https://www.federalregister.gov/?tab=t.0#heading=h.6mzzlj6y1sm3)
71. **FTC Act - Section 5** (Cited: [A](#))
<https://www.law.cornell.edu/uscode/text/15/45>
72. **Brazil's Competition Law - Article 36** (Cited: [A](#))
<https://cdn.cade.gov.br/portal-ingles/topics/leniency%20program/Applicable%20Laws/law-no-12529-2011-english-version-from-18-05-2012.pdf>
73. **Act against Restraints of Competition (GWB)** (Cited: [A](#) & [B](#))
https://www.gesetze-im-internet.de/englisch_gwb/englisch_gwb.html#p0062
74. **Following Microsoft's designation under Section 19a(1)** (Cited: [A](#))
https://www.bundeskartellamt.de/EN/Digital_economy/proceedings_against_large_digital_companies/Microsoft/Microsoft.html
75. **Australia's Competition and Consumer Act 2010** (Cited: [A](#))
https://www.legislation.gov.au/C2004A00109/2026-01-01/2026-01-01/text/original/epub/OEBPS/document_1/document_1.html
76. **Australia's Competition and Consumer Act 2010** (Cited: [A](#))
<https://www.legislation.gov.au/C2004A00109/latest/text/4>
77. **ACCC's compliance and enforcement priorities update 2026-27 address** (Cited: [A](#))
<https://www.accc.gov.au/about-us/news/speeches/acccs-compliance-and-enforcement-priorities-update-2026-27-address>
78. **Canada's Competition Act - Section 79** (Cited: [A](#))
<https://laws-lois.justice.gc.ca/eng/acts/C-34/section-79.html>
79. **We have written about this case before from the perspective of API access** (Cited: [A](#))
<https://open-web-advocacy.org/blog/our-submission-to-the-cma-on-apples-ios-interoperability-commitments/#lessons-from-history%3A-the-doj-vs-microsoft>
80. **US vs Microsoft - Finding of Fact** (Cited: [A](#), [B](#) & [C](#))
<https://www.justice.gov/atr/us-v-microsoft-courts-findings-fact>
81. **have written extensively about the value this investment brings** (Cited: [A](#))

<https://open-web-advocacy.org/blog/break-googles-search-monopoly-without-breaking-the-web/#what's-in-chromium%3F>

82. **Ben Schoon - 9to5Google** (Cited: [A](#))
<https://9to5google.com/2020/02/24/google-chrome-microsoft-edge-switch-pop-up/>
83. **Lawrence Abrams - Bleeping Computer** (Cited: [A](#))
<https://www.bleepingcomputer.com/news/microsoft/windows-10-test-halts-competing-browser-installs-suggests-edge-inste-ad/>
84. **Source: Bleeping Computer** (Cited: [A](#))
<https://www.bleepingcomputer.com/news/microsoft/windows-10-test-halts-competing-browser-installs-suggests-edge-inste-ad/>
85. **CMA - Google's agreements with device manufacturers and app developers** (Cited: [A](#))
https://assets.publishing.service.gov.uk/media/62a0d5cbe90e07039ba54eee/Appendix_E_-_Google_agreements_with_device_manufacturers_and_app_developers.pdf
86. **On Windows in December 2025** (Cited: [A](#))
<https://radar.cloudflare.com/reports/browser-market-share-2025-q4>
87. **Satya Nadella told investors that "Edge surpassed 30% market share in the US on Windows" and had "taken share for 15 consecutive quarters"** (Cited: [A](#))
<https://www.microsoft.com/en-us/investor/events/fy-2025/earnings-fy-2025-q2#:~:text=Edge%20surpassed%2030%25%20market%20share>
88. **Microsoft again told investors that Edge had "taken share for 20 consecutive quarters," while Bing monthly active users had reached 1 billion for the first time** (Cited: [A](#))
<https://www.windowslatest.com/2026/04/30/microsofts-satya-nadella-confirms-1-6-billion-monthly-windows-users-bing-crosses-1-billion-for-the-first-time/>
89. **complex revenue-sharing and placement arrangements with device manufacturers** (Cited: [A](#))
https://assets.publishing.service.gov.uk/media/62a0d5cbe90e07039ba54eee/Appendix_E_-_Google_agreements_with_device_manufacturers_and_app_developers.pdf
90. **in the previous section** (Cited: [A](#))
<https://www.bleepingcomputer.com/news/microsoft/windows-10-test-halts-competing-browser-installs-suggests-edge-inste-ad/?tab=t.0#heading=h.1bry9yozhekp>
91. **Plaintiffs' Joint Proposed Conclusions Of Law : U.S. V. Microsoft Corporation** (Cited: [A](#))
<https://www.justice.gov/atr/plaintiffs-joint-proposed-conclusions-law-us-v-microsoft-corporation-state-new-york-v-microsoft>
92. **U.S. v. Apple (2d Cir. 2015)** (Cited: [A](#))
<https://www.justice.gov/atr/case-document/file/624326/dl>
93. **National Society of Professional Engineers v. United States** (Cited: [A](#))
<https://tile.loc.gov/storage-services/service/ll/usrep/usrep435/usrep435679/usrep435679.pdf>
94. **Google and Alphabet v Commission (Google Shopping)** (Cited: [A](#))
<https://curia.europa.eu/site/upload/docs/application/pdf/2021-11/cp210197en.pdf>

95. **9.3 trillion page loads per year** (Cited: [A](#))

<https://ar5iv.labs.arxiv.org/html/2404.17095v2#:~:text=we%20projected%20total%20web%20traffic%20to%20reach%20781%20billion%20visits%20per%20month>



12. Appendix

12.1. Time Saved By Small Browser Improvements

How much time is saved by small improvements in browser load speed?

1. There are approximately [9.3 trillion page loads per year](#).
2. If each page load was 1ms faster that would save 9.3 billion seconds per year.
3. That comes to approximately 300 years saved every year.

12.2. Modified Bing Search Times

This list of search terms appear to have changed over time. We've previously seen the promotional Edge message appear for the terms "Google Browser", "Arc Browser", "UC Browser", "DuckDuckGo Browser" and "Aloha Browser" as well, although at the time of publishing this isn't the case.

13. Open Web Advocacy

Open Web Advocacy is a not-for-profit organization made up of a loose group of software engineers from all over the world, who work for many different companies and have come together to fight for the future of the open web by providing regulators, legislators and policymakers the intricate technical details that they need to understand the major anti-competitive issues in our industry and potential ways to solve them.

This is a grassroots effort by software engineers as individuals and not on behalf of their employers or any of the browser vendors.

We are available to regulators, legislators and policy makers for presentations/Q&A and we can provide expert technical analysis on topics in this area.

For those who would like to help or join us in fighting for a free and open future for the web, please contact us at any of the links below.





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