Developers Alliance's Response to the Consultation on Steering Conduct Requirement for Google's Mobile Platform

The Developers Alliance welcomes the opportunity to respond to the CMA's consultation on the Steering Conduct Requirement (SCR) for Google's Mobile Platform.

I. General remarks

The Android ecosystem was conceived as an open source platform, allowing different distribution channels for app developers (e.g. sideloading, web browser downloads). Steering represents another option for app developers, in addition to other channels used to engage and transact with their customers. As we mentioned in our previous submission for the *Call for Evidence on Recent Developments in Apple's and Google's App Store Rules*, while the steering option is attractive for certain app developers (including large platform providers), many app developers (especially small and medium-size ones) continue and are willing to strongly benefit from app stores' integrated services.

A payment infrastructure that includes custom billing systems, refund portals, and customer support channels is too costly and cumbersome for the large majority of Android developers. Google Play offers them not only an integrated system at a high standard of security and safety, but also a global one, which is valuable for many developers operating across jurisdictions. It covers taxes, compliance, and subscriptions across 195+ markets with 300+ local payment methods. Android developers' preference for Google Play is also explained by the additional tools and full app lifecycle support that Android developers benefit from, beyond the payment and customer management system. From this perspective, we note that the proposed Steering CR' scope is **of interest to a limited number of app developers**.

With regard to the recent Google's measures rolled-out in the UK on 30 June 2026, we are currently assessing their impact through our ongoing interactions with Android developers. Given the short timeframe, it is too early to offer conclusive opinions, also in relation to the Steering CR. **The timing of the Steering CR is inopportune,** it would be more effective to first evaluate Google's new business model and gather evidence over a sufficient period after the rolling-out.

We acknowledge that the new billing choice on Google Play will gradually be implemented in an uniform way at global level. We already received positive feedback from Android developers on this announcement. Indie developers, in particular, appreciate the new fees, as "every percent counts when you're small".

Regarding steering specifically, developers now have the option to completely disconnect from Google Play billing, granting them full flexibility over commercial terms, refund processing, and the advertising of linked offers. This approach allows them to seamlessly transition users to direct-to-web transactions for future orders. Once that direct connection is established, **developers can entirely bypass Google Play's service fees.** To maintain security, we reiterate our stance that **link-outs must lead exclusively to content under the developer's direct control**. This safeguards users from scenarios where linked content could be covertly modified to introduce malware without the developer's knowledge. Presenting these alternative billing link-outs side-by-side with Google Play Billing ensures a fair, transparent choice for users, but also a fair option for app developers.

Overall, the app developers' reactions we heard so far confirm that the new expanded billing choice on Google Play responds to the needs of those interested in steering for the purpose of completing transactions. **We are unaware so far of app developers interested in other purposes of steering other than payments,** and therefore appreciate the CMA's observation in this sense.

With regard to the European Commission's decision on Google's compliance with art. 5.4 DMA on steering rules, we expressed our deep concerns on the scope of the mandated measures allowing unrestricted links to non-developer-owned content.

II. User experience and design options

As mentioned above, the new Google billing choice program already sets the conditions for those developers that want to set an alternative billing system or link users to their own website for purchases, alongside Google Play's billing. The users can complete the transaction within the app's interface or are directed to developers's website to complete the transaction. The app developers can design and render their own custom choice screen within the app, instead of using Google Play's default version (provided they follow UX guidelines).

We reiterate the importance of **only allowing links used for the purposes of facilitating steered transactions direct users to offers that are owned, operated or controlled by the relevant developer, for security purposes**.

We also find relevant and proportionate the other requirements for the external web links:

- to inform the user about the destination page and its purpose within the application before redirecting them to it
- to protect user data, they must not contain information that allows the user to be personally identified without sufficient security/encryption techniques

- they must not deceive users or redirect them to a different landing page than the one shown in the external link, nor present false or misleading information.

Similarly, the mandatory parental controls and one-time information screens are reasonable and necessary conditions.

While avoiding unnecessary friction, **it is essential that users understand the steps for each interaction and transaction they make.** App developers rely on users' trust and any changes should preserve it, for the benefit of the attractiveness and growth of the Android ecosystem. In particular on WebWiews, we recognize that the risks of user confusion and exploitation overcome the presumed benefit of lower friction. Moreover, it doesn't have a significant impact on the uptake of steering, as the CMA rightfully notes.

Our initial assessment suggests that Google's program introduces a fair and equal UI/UX design that places alternative billing choices on an equivalent footing with Google Play's offers.

III. Steering fees

From developers' perspective, maintaining a balance between lower fees and a high-performance, secure platform is critical for medium and long-term success. While we appreciate the CMA's focus on ensuring a competitive app ecosystem, including by lower fees, **the proposed approach should be reconsidered.**

We caution the CMA against interventions (in the same vein to the European Commission's enforcement of the DMA) that risks transforming Android into a commoditized utility rather than a thriving, innovative ecosystem. **The utility regulation approach is not appropriate for mobile ecosystems.** As mentioned in the general remarks, the large majority of developers appreciate and rely on Google's mobile platform. Of course, any fee reduction is highly welcome, especially by small and mid-size app developers. The platform value is not taken for granted by Android developers. **A rigid markup pricing model does not reflect the reality of the Play ecosystem,** where developers benefit from global distribution and advanced tools that extend beyond simple fee-based services.

Google's updated business model already addresses primary concerns by decoupling billing from service fees. These changes provide immediate, predictable financial relief without the need for lengthy new regulatory processes.

We are concerned that capping fees based on rigid costs will deter Google's current developer support and the incentives for innovation, particularly in critical areas like AI, which already boost developers' productivity. App developers' businesses thrive on the consumer dividend and the high level of trust users have in the Android ecosystem. Google Play ensures a secure environment that drives user downloads. Heavy-handed price controls could lead to stagnant quality and a lack of innovation in platform security, harming user trust, and ultimately the growth of Android apps.

Last, but not least, we insist on the need for global coherence. The UK market should not be at risk of being unattractive for Android developers operating across multiple jurisdictions, just because of divergent conditions. In accordance with its commitment to avoid cross-jurisdictional conflicts, the CMA should **refrain from prematurely enforcing requirements that impede a globally coherent Play model**.

IV. Conclusion

We recommend that the CMA allow the Android developers to fully utilize and evaluate the newly Google alternative billing model before locking the UK market into a rigid regulatory framework that may stifle the very growth it seeks to promote.

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This contribution doesn't contain confidential information.

Developers Alliance receives financial support from Google. Notwithstanding, Developers Alliance's policy positions, including this submission, are solely attributable to the Developers Alliance and are formulated independent of any funder oversight.

The Developers Alliance advocates on behalf of software developers, the companies they lead, and the industries that depend on them. We help policymakers and stakeholders understand the specific needs of the developer workforce and advocate for policies that responsibly advance the broader tech sector.