Guardian input - DRAFT - CMA mobile ecosystems

[redacted]

General
6.2 Do you have any views or evidence on the **benefits or costs of the proposed Steering CR?**

Enabling developers to communicate with and guide users off-platform without unnecessary technical friction or warning screens is a constructive step towards fostering an open, competitive mobile ecosystem.

As per the Guardian's previous submissions on this designation, the direct costs of transition are expected to be minimal - some initial product engineering and design costs but no substantial incremental fixed costs.

While the proposed Conduct Requirement (CR) provides meaningful progress, certain structural elements are likely to frustrate the core objectives and limit take up of the new steering right;

- The framework for determining steering fees is highly directional, providing wide discretion that **could result in charges that are only minimally less -** or in the case of news publishers, **actually higher** - than the current commission.
- Permitting **steering fees on ongoing subscriptions is unjustified** and limits the long-term efficacy of alternative billing channels.
- **Interstitial screens will continue to create unnecessary friction** and act as a potential deterrent
- The CRs do not differentiate between unverified third parties and established first-party domains where secure data handling is already standard practice and 'security' concerns are moot. Clicking from a newspaper app to its website is moving between **two properties operated by the same publisher under the same brand**. There is no risk of deception or unverified third-party fraud.

We have tried to address the questions below in a constructive manner, but are concerned that as the CRs are currently written, the benefits to news publishers - and our audiences - will be minimal.

6.3 Do you have any views on the **proposed scope of the Steering CR i**n particular:
(a) allowing Google to re**quire that any steering links must direct users to a developer's own website**; and/or

Directing users to the developer's own website is acceptable provided the definition of 'website' is interpreted broadly. It should include secure online checkout pages and account areas without any artificial technical blocks.

(b) allowing Google to require that any **steering links be for the purposes of completing steered transactions**?

Restricting steering links solely to the completion of transactions is overly restrictive. Developers should be permitted to **steer users for broader purposes**, such as account creation, subscription management, or accessing pricing information.

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6.4 Please share any general or specific views you have on the measures that [Google rolled-out] in the UK on 30 June 2026.

We would welcome a **revised, binding CR** that sets out detailed requirements and limitations in line with the suggestions set out in this submission, rather than voluntary measures. Having mandated requirements, accountable to a regulator, will better ensure commercial equivalence between in and off app options, and ensure fee structures that make external steering attractive and viable.

User experience and design options

6.5 Do you conside**r our proposals would achieve both enabling effective steering in practice,** and allowing Google to introduce necessary measures to protect and inform users?

[redacted]

[redacted]

6.6 Are there additional risks and mitigations that you consider could be addressed through a steering CR?

(i) **Set framework for additional intervention:** The efficacy of these CRs will be the take up rate - but the experience in the EU (where fees are around the 20% mark) suggests that **unless fees are meaningfully reduced, the steering right will not be utilised**. The biggest risk is that platforms maintain current commission levels through the steering fee (see answer to 6.9).

Therefore the CMA should **commit to tracking the real world adoptio**n of this CR against clear, published metrics, and intervene in a timely manner if the remedy proves ineffective.

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[redacted]

[redacted]

[redacted]

6.7 Do you have any views on allowing a **single neutral interstitial screen** that informs an end-user that they are moving outside of in-app purchase system? In particular:
(a) do you consider that this is appropriate?

Under current in-app purchase architecture, consumers are often unaware that their subscription and data is being managed by the platform. It is not flagged that a substantial portion of their subscription - and subsequent renewals - is going to Apple or Google. Introducing an interstitial screen solely for external redirection **introduces asymmetric friction,** given that standard in-app purchases do not explicitly flag the platform's financial role to the consumer.

There are many app experiences where audiences are safely moved from an app to a website without an interstitial screen, such as when verifying or creating a new password or when re/setting login credentials.

(b) do you have views or evidence on how to **further reduce the friction from these interstitial screens** (eg by time-bounding, frequency-bounding, default settings or reserving the screens for specific transactions)?

While we disagree with the premise of interstitial screens, if they are permitted, they should be subject to specific mitigations, prescribed in the CR.

- **Entirely neutral in design and tone.** For example, a phrase such as "You are now leaving the app" (as per the illustration in the explanatory notes,) carries negative connotations that can discourage users. A more objective approach would allow factual wording, such as: "You are now being directed to the publisher's secure website to complete your purchase".
- Prohibited from containing **cautionary design elements**
- **Frictionless user experience** - the notice should require no more than a **single tap** with no secondary confirmations or extra steps
- Strict **frequency caps** - we suggest no more than **one per app each six months**
- **No additional interstitials** - This screen should only appear in user journeys where an equivalent screen already exists today.
- Allow developers **appeal/edit rights** to ensure timely rectification of issues.

6.8 What do you consider to be the benefits and drawbacks of allowing Google to p**rohibit steering to WebViews?**

Prohibiting in-app WebViews and forcing users to launch an external web browser increases transaction friction and reduces conversion rates, degrading the user experience.

There are no clear benefits to an outright prohibition, as modern WebViews easily support secure, sandboxed checkout environments. The CMA should permit WebViews to ensure a seamless steering experience. At a minimum, they should clearly define the criteria and timeline under which this prohibition will be reviewed.

Steering fees
6.9 Do you have any views on the **approach to steering fees** in the proposed Steering CR, in particular:

(a) Do you consider the principles the CMA has proposed are appropriate, including the use of cost-plus and value, how each are defined, and the relationship between these two -principles?
(b) Do you have any views on the practical benefits and risks of the principles the CMA has proposed?
(c) Do you have any other views or evidence on the principles that Google must apply when setting steering fees?

We disagree with cost-plus and value as an appropriate way to determine the steering charge.

- The proposed principles are unduly broad; terms such as "reasonable rate of return on investment" are highly subjective. Reasonable to who? Apple's shareholders or app developers? [redacted] For those reasons '**fair value' can not be accurately determined or verified.** We would recommend the CMA require a transparent, cost only mechanism for determining the steering fee.

- **Allowing steering fees for ongoing subscriptions is unjustified**. When a subscription moves off-platform, the ongoing costs of customer retention, payment fulfilment, billing management, and customer service fall entirely on the publisher. Unlike original payments, fees levied on steered transactions represent a recovery of opportunity cost rather than a service the platform delivers. This position aligns with recent international regulatory assessments under the EU Digital Markets Act and findings in the US *Epic Games v. Apple* litigation regarding the economic basis of external billing commissions.

- Furthermore, many publishers already integrate and pay for platform-affiliated payment options (such as digital wallets) on their own websites. This means that platforms can benefit financially even after a user has been steered off-platform. **Steering fees should therefore be strictly time-limited and prohibited entirely on subscription renewals.**