

Individual responses to the CMA's proposed steering conduct requirement consultation for Apple and Google's mobile platforms

Respondent 1

I am formally submitting this comprehensive response to the ongoing consultation regarding the conduct requirements for Apple's mobile platform under Part 1 of the Digital Markets, Competition and Consumers (DMCC) Act. This submission provides exhaustive empirical evidence demonstrating how Apple Inc. leverages operating system architecture within iOS to [REDACTED] foreclose the third-party keyboard extension market.

This submission directly supplements my formal enforcement complaint filed under Submission Number: [REDACTED]. We request the DMBC incorporate these 8 core architectural [REDACTED] into the final SMS conduct mandates:

1. Framework Self-Preferencing & Cursor Control [REDACTED]

Apple denies third-party developers access to essential text-layout frameworks and text-introspection metrics. While Apple's native keyboard enjoys system-level integration allowing fluid, multi-directional vertical cursor control across text blocks, alternative keyboards are hard-blocked from these metrics. This [REDACTED] disparity restricts competitors to horizontal adjustments, making third-party products appear fundamentally broken to consumers.

2. [REDACTED] Memory Starvation (Baseline Cap):

Apple enforces an aggressive, immutable memory ceiling strictly on third-party Keyboard Extensions (capped around 30MB-40MB). While Apple's native input architecture uses dynamic, high-priority system memory to process predictive models and layouts, alternative keyboards are instantly terminated (Process Eviction) by the OS under standard workloads, forcing a hard reset back to native software.

3. Secure Context Exclusionary Practices:

Apple completely blocks third-party keyboards from initializing in secure text fields (e.g., password inputs, banking applications) via a mandatory runtime switch to its native software. Instead of providing an audited, secure sandbox for alternative tools, [REDACTED]

4. [REDACTED]

Enabling a third-party keyboard triggers an alarming, non-reciprocal privacy dialog claiming the software may log sensitive personal and financial data. Apple applies these

unilaterally to competitors while exempting its own telemetry-native tools from equivalent warning thresholds, distorting consumer choice.

5. Memory Management & Leaks:

Within the iOS ecosystem, Apple applies a garbage collection and allocation policy the UINavigationController framework. The operating system fails to execute proper deallocation cycles (discriminatory Automatic Reference Counting - ARC handling) exclusively for alternative extensions during layout or dictionary cycles. This retention causes memory leaks, forcing processes to breach the 30MB-40MB ceiling under standard operational workflows, accelerating process eviction.

6. Latency & Tactile

Apple sub-millisecond tactile and visual latency spikes uniquely triggered during non-native extension initialization. This includes within core system Haptic Feedback loops and layout-rendering glitches during transitions to secure contexts (isSecureTextEntry). This artificially

7. Exclusionary AI (Local LLM):

Apple hardware dominance to leverage Apple Intelligence while foreclosing competitors. In iOS 27, third-party extensions are strictly blocked from accessing the device's local Neural Engine (ANE) and system-optimized Small Language Models (SLMs) for local predictive text and auto-correction. This forces alternative developers to either abandon AI features or rely on cloud APIs, compromising privacy, increasing latency, and introducing unsustainable server costs.

8. Forensic Telemetry Mapping & Statutory Discovery Triggers:

To facilitate a rapid investigation, we direct the CMA's technical unit to invoke its statutory information-gathering powers under the DMCC Act to audit the following forensic checkpoints:

- Jetsam Memory Event Logs: Audit iOS 27 system logs for Process Eviction tagged under UINavigationController to memory priority ranking.
- sysdiagnose Diagnostic Audit: Analyze framework dumps during active transitions to secure contexts (isSecureTextEntry) to capture latency inside the com.apple.keyboard backend in real-time.

- Statutory Information Notices: Demand Apple's internal micro-architectural specifications for memory ceilings on third-party plugins versus native frameworks to [REDACTED] the resource caps.

Respondent 2

I would like to participate in the open consultation and share my feedback on the recent Play Store changes, including:

- Allowing link-outs and alternative payment options in the US.
- The reduced fees introduced through the Google Play Level Up Program.

I'm the CEO of Offroad Games, a mobile game studio based in London. We founded the company 18 months ago after spinning out from Space Ape Games when Supercell fully acquired the studio in February 2025. Today our team is 21 people, and we operate two live games.

Overall, I believe Google is moving in the right direction and has struck a fair balance. First, developers in the US can now offer alternative payment options through link-outs. Second, the Google Play Level Up Program improves the Play Store experience while offering developers clearer and reduced platform fees.

As a developer, I'm happy to participate in the Level Up Program. It provides more predictable economics while still encouraging Google to invest in the platform and the overall purchasing experience. In my view, Google has taken a more proactive and balanced approach than Apple, resulting in a better outcome for both developers and Google.

One request I would make is to extend link-outs beyond the US. If the goal is to give consumers more choice and encourage competition, developers worldwide should be able to offer alternative payment options, allowing users to choose the solution that provides the best value for them.