ROCKING TECH

Response to the consultation on the proposed Steering conduct requirement for Apple's mobile platform

25 July 2026

Rocking Tech is a software agency in Milton Keynes. We build web platforms for UK SMEs and startups, and before a build we advise founders on what is worth building, including whether a product needs to be native at all. We also implement the payment side of those products, typically through providers such as Stripe. We support the principle of steering, and this response focuses on the steering fee (question 6.8).

The fee is the point on which the remedy depends. If Apple is able to set it close to its current commission, steering is unlikely to change developer or consumer outcomes, because in practice it becomes the same charge under a different name.

We support the cost-based principle as the binding constraint on any steering fee. Through implementing card payments on our own and our clients' web products, we see what payment processing costs, and it is a small fraction of the commission charged within the store. A fee that genuinely reflects the cost of the service provided would therefore sit well below the current commission, which is the outcome the remedy is intended to achieve.

Our concern with the value-based principle is that it risks reintroducing the charge the remedy is meant to discipline, because it invites pricing by reference to the value of the platform rather than the cost of the service. Where the two principles point to different outcomes, we would encourage the cost-based principle to take precedence.

We would be glad to provide further detail if that would assist.

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