

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

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

I. General remarks

As 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 a limited number of 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.

However, certain iOS developers would like to benefit from improved conditions, including the possibility of offering to their users alternative payment systems. Many app developers operate in both Android and iOS ecosystems. They are the ones that observe the best the differences between the two platforms. From this perspective, it is obvious that **Apple must implement more substantial changes**, compared to the developer options already available in the Android environment.

We share CMA's provisional view that Apple may require **steering links to direct users to a website owned, operated, or controlled by the developer**. This aligns with our stance that maintaining the transaction within the developer's direct control is essential for mitigating the privacy and security risks, such as fraud and malicious content. This will ensure accountability and maintain the integrity of the transaction environment. However, any requirement for link destinations must not be interpreted by Apple in a way that would significantly impede the ability of app developers to use well-established third-party payment processors.

Similarly to our observations on Google's mobile platform, **steering should be primarily for the purpose of completing steered transactions**. From the input collected from our community, providing an alternative route for transactions is the primary driver of developer demand for these changes.

We acknowledge the CMA's observations regarding **cross-jurisdictional coherence**, specifically referencing Apple's implementation of steering measures in the EU, Japan or Brazil. Regulatory alignment would drive Apple to apply consistent measures, and thus reduce implementation complexity for developers operating across multiple jurisdictions.

II. User experience and design options

App developers should have the right to offer **alternative payment options side-by-side with the App Store's in-app purchase system**. This should allow users to make informed comparisons regarding price and promotional benefits at the point of decision-making.

App developers should also be able to show links used for the purposes of facilitating steered transactions direct users to websites that are owned, operated or controlled by the relevant developer.

Regarding the proposed design, the proposal for **a single neutral interstitial screen** represents an appropriate option. This balanced measure provides necessary information to users, which should be properly informed that they are leaving the Apple environment, without introducing the "scare screens" or alarmist language that could discourage legitimate transactions.

In accordance with the implementation of measures imposed in other jurisdictions (Japan, EU), as CMA rightfully notes, the use of **dynamic links** (or equivalent alternatives) or **link parameters** by developers when generating steering links **should not be restricted**.

We support that **developers should be permitted to communicate through free text** without restrictions imposed by Apple beyond general App Store rules relating to illegal or harmful content, and without fees being charged in relation to such communications.

The inclusion of **targeted measures to protect children**, such as parental gates or restrictions on steering for younger users are necessary and appropriate safeguards for Apple's Mobile Platform, similarly to the Android ecosystem.

We agree with the CMA's assessment that the risks of user confusion and exploitation associated with **WebViews** outweigh the presumed benefits of lower friction. Restricting WebViews for steering does not appear to have a significant negative impact on the uptake of steering, provided that external browser journeys are kept efficient.

III. Steering fees

The large majority of developers rely on and benefit immensely from the tools, security, and global distribution provided by the App Store. As previously mentioned, there are certain developers interested in offering alternatives for payment to their customers.

While app developers certainly welcome the prospect of lower fees, we believe the **utility-style regulation approach - specifically a rigid cost-based cap, is not appropriate for dynamic mobile ecosystems**. Correspondingly to our observations on Google's mobile platform, a fee structure based solely on rigid cost-recovery principles could deter Apple's current level of developer support and investment in platform security, development and innovation.

We suggest a framework that acknowledges the value-based principle, ensuring Apple receives fair remuneration for its services, while adjusting for certain unbalanced limitations. Furthermore, **fees should be calibrated to keep steering commercially viable** without compromising the platform's long-term sustainability.

IV. Conclusion

The Developers Alliance encourages changes to Apple's mobile ecosystem for the UK, pursuing the same approach already offered in other jurisdictions, and similarly to those available on the Android ecosystem. We believe that providing adequate steering options and balanced, fair fees can be achieved without compromising the security of the ecosystem or user trust. On the contrary, these changes will enable app developers to benefit even more from the platform, driving further innovation and providing better value to UK consumers.

This contribution doesn't contain confidential information.

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.