Response to UK Competition and Markets Authority Consultation on Google's general search services: proposed user choice conduct requirement
9 October 2026

On behalf of Chamber of Progress, a tech industry association supporting public policies to build a more inclusive society in which all people benefit from technological advancements, I write in response to the CMA's further consultation on the proposed User Choice Conduct Requirement for Google's general search services.[1]

We support the objective of enabling users to make informed and effective choices. The revised proposals make welcome progress towards a more proportionate approach, including skippable annual notifications, limiting annual redisplay and trials to new Android devices, and reducing reporting frequency after the first year where compliance is satisfactory. We also welcome the continued recognition that search services and user expectations are evolving.

Our response builds on our earlier submissions, which emphasised consumer welfare, respect for informed decisions, and the need to preserve innovation and the benefits of the Android ecosystem.[2] We encourage the CMA to apply those principles to the remaining requirements, with clearer evidence of their incremental benefits and greater flexibility over implementation.

1. **Define success through informed decisions and consumer benefit**

Section 20(2)(e) of the DMCCA permits requirements that enable users to make informed and effective decisions in their own best interests. The consultation identifies awareness, engagement, confidence and ease of choosing a provider as its aims. These are legitimate objectives. To guide remedy design and review, the CMA should explain more precisely which obstacles prevent consumers from obtaining the search service they prefer, how widespread those obstacles are,

[1]CMA Consultation Google's general search services: proposed user choice conduct requirement, opened 23 Sep 2026, available here.
[2] Chamber of Progress "Submission on Google's general search services: proposed conduct requirements" (25 February 2026), pp. 3–7, available here.

the cost to user convenience of addressing these obstacles, and what improvement each proposed measure is expected to deliver.

The CMA's confirmation in paragraph 5.45 that switching is not an objective in itself is important. A user who understands the alternatives and chooses to retain an existing provider has exercised choice. The assessment of success should recognise that outcome, alongside users' understanding of their settings, ability to change them, and satisfaction with the resulting service. Low switching after an informed decision should not, by itself, justify more intrusive measures.[3]

The commissioned research provides useful insights into comprehension and design. It comprised 40 self-guided tests followed by 40 guided tests, and its authors expressly caution that the small, non-random sample cannot support quantitative conclusions or predictions of behaviour across the wider population.[4] The research should inform further testing, rather than be treated as establishing the scale of benefits or the optimal frequency of prompting. Field testing should compare the incremental effects of additional features against a simpler package of clear information and accessible settings.

2. Assess the incremental benefits and full costs of each measure

Section 19(5) of the DMCCA requires conduct requirements to be proportionate, and the CMA's four-part test provides a sound basis for that assessment. We welcome its reconsideration of the estimated benefit of finding a better-matched provider. The previous £149 proxy has been replaced with estimates of £4.22 and £14.77 derived from consumer-surplus calculations in a US desktop study. As the CMA recognises, these figures were estimated for a different purpose and have limitations. The final assessment should clarify their applicability to UK users, particularly on mobile devices, and the sensitivity of its conclusions to different assumptions.

The broader competition analysis also needs a clearer account of causation. Paragraph 5.47 illustrates that very small improvements in service quality or advertising prices could outweigh the estimated costs. Those calculations show

[3] CMA "Consultation: User Choice Conduct Requirement" (23 September 2026), paras. 2.1–2.3 and 5.45, available here.
[4] Thinks Insight & Strategy / CMA "User research on choice screens in search" (April 2026), pp. 15–16 and 46–47, available here.

the improvement needed to offset costs; they do not establish that annual notifications, a trial mechanism, or a particular ordering rule will generate it. The CMA should explain the additional contribution of each feature beyond the benefits of the simpler choice measures, taking account of the competition already emerging from AI-enabled services.

Consumer costs should capture the complete experience. Paragraphs 5.25 and 5.27 assume no material time cost for users who dismiss skippable notifications. Dismissal still requires attention and a decision, and the effect on a task may extend beyond the time spent clicking. More specifically, footnote 189 assumes that everyone who engages with the annually redisplayed choice screen does so to change provider. Users may review alternatives and reaffirm their existing choice. Their time should also be included in the assessment, even where it produces no additional switching.

The final analysis should therefore test the time and cognitive demands of the full revised journey, including the information screen, compulsory scrolling and trial option. It should also identify the costs of eligibility assessment and technical integration, including costs borne by applicants and OEMs. Limiting retrofits on existing Android devices is welcome, but does not establish that all remaining implementation costs are negligible. As our previous submissions emphasised, preserving device affordability should remain part of the assessment where changes affect OEM costs or commercial arrangements.

3. Apply equivalent search standards for categorising eligible providers

Our February response supported criteria that reflect how users access information, including through AI-enabled services. We retain that position. Technology neutrality should nevertheless require all eligible providers to perform the essential functions of a general search service. It should not give providers of other services, including large AI assistants, preferential access to search distribution channels while holding them to weaker functional standards.

The revised criteria risk creating that imbalance if a service can qualify by generating answers without ordinarily providing usable links to relevant websites. Access to those websites allows users to navigate, compare offerings and verify information, and enables publishers to reach audiences. Admitting an answer-only service on the same terms as providers that deliver these functions

would artificially advantage non-search providers and could leave users with an incomplete substitute for their chosen search service. The choice screen should promote competition between services that meet users' search needs on an equivalent functional basis.

The proposed interpretative notes require web-search capability, clear and accurate attribution in generative AI summaries, and a means to access the underlying content. Those safeguards are welcome, but their practical meaning requires clarification. Note 34 envisages testing navigational queries by adding the word "link" where a service would otherwise not return links. Eligibility should be assessed against the ordinary user experience, including whether relevant links and source attribution are readily accessible when needed, rather than a capability demonstrated only through specially reformulated assessment queries.

These requirements need not prescribe a particular interface or require a list of links for every query. They should establish equivalent outcomes for web navigation, access to sources and meaningful attribution across Google and competing providers. The CMA should publish clear minimum standards, test them consistently, and consult OEMs and publishers on the functionality and attribution they reasonably expect. This would allow innovative AI search services to participate while preventing the choice screen from conferring an artificial advantage on services that do not offer a genuine general search substitute.

4. **Respect completed choices and test the proposed screen design**

Making annual notifications skippable and visually limited reduces the burden identified in our earlier response. A lasting option to decline further reminders would better respect users who have made an informed selection. They would continue to be able to change providers through settings whenever they wished. The six-month exception for a recent deliberate selection does not provide that lasting control, and its operation remains subject to technical limitations. The case for an annual frequency should be tested against less frequent reminders and a user-controlled option.

The proposed fully random ordering and compulsory scrolling also merit further testing. The CMA's research found that some participants were overwhelmed by

unfamiliar options, missed explanations of random ordering, and assumed that popular choices would appear near the top.[5] It also found that alternatives below the fold were sometimes missed. These findings support making available options clear, but do not establish that forcing every user to scroll through the full list of up to twelve providers is the best solution. The report identifies clearer scroll cues and grouping as possibilities for further testing.

The CMA should compare designs on comprehension, confidence and the ease of finding a preferred provider before fixing these elements in the requirement. A clear route to the full list can preserve access to alternatives while allowing a manageable initial presentation. Neutrality should be assessed alongside usability, including for users with lower digital confidence.

An optional trial may help hesitant users explore unfamiliar services, and the research records positive experiences among participants who tried an alternative in the pre-task.[6] It also records confusion about what the trial means, while the notification at the end of the trial was not tested. Further testing should cover the full journey and make clear that ordinary default choices are also reversible, whether a service charges or limits free queries, and what happens if the trial-end notification is dismissed. Those findings should inform the mechanism and timing, with scope to simplify or vary the requirement where it adds little benefit.

5. **Preserve user control and security in technical implementation**

A central default setting can make switching easier, but its effect across the search widget and Chrome should be clear before a user confirms a change. Users may deliberately prefer different providers at different access points. The implementation should preserve the ability to make those separate choices and avoid silently replacing an intentional browser setting. The proposed retention of existing settings pathways is helpful and should remain an explicit part of the design.

Concluding Remarks

[5] Thinks Insight & Strategy / CMA "User research on choice screens in search" (April 2026), pp. 24–27, available here.
[6] Thinks Insight & Strategy / CMA "User research on choice screens in search" (April 2026), pp. 35–38, available here.

The CMA's willingness to revise its proposals in response to evidence is a strength of the UK framework. We encourage it to carry that approach through to the final requirement by testing additional features, accounting for their full costs, and allowing users to retain an informed choice. This would support effective competition while preserving the convenience and confidence that consumers value.

Chamber of Progress remains supportive of the CMA's approach, its open regulatory dialogue and continued stakeholder engagement. We stand ready to assist as it pursues its ongoing mission of making markets work better for consumers.

Sincerely,





Vice President for Europe