Platform Leaders' Response to the CMA's Further Consultation on the User Choice Conduct Requirement

Google's General Search Services

October 2026

Introduction

Platform Leaders welcomes the opportunity to respond to the CMA's further consultation on the User Choice Conduct Requirement (CR) published on 23 September 2026. Our response builds on our February 2026 response and our earlier submissions of January and July 2025.

Platform Leaders brings together entrepreneurs, practitioners, policy makers, researchers and investors in digital platforms. Many in our community are marketplaces, scale-ups and AI-first businesses that both compete with and depend on Google's services. Our interest is in a market where users can choose easily, where new services can be discovered, and where all participants, including Google, can continue to innovate.

We are grateful that the CMA has addressed several points raised in our February submission, including more technology-neutral eligibility criteria, a clearer eligibility process, annual resurfacing and the test-drive. We also welcome the Thinks user research, which we had encouraged and which gives all parties a shared evidence base.

Overall, we **support the revised User Choice CR**. It is simpler, less intrusive for users and more practical for Google to implement, while keeping what matters most for effective choice. This response focuses on suggestions to remove remaining friction, protect users, in particular those with lower digital confidence, and iteratively improve the overall user experience while giving all parties greater predictability. We note that many of our points can be addressed in interpretative notes or implementation guidance rather than in the CR itself.

Responses to Consultation Questions

Question 6.1(a)(i): *Eligibility criteria and associated interpretative notes*

We **support** the revised criteria. The move to "general search service", "including by searching the web" and the removal of the marketing criterion address, in a technology-neutral way, our February point that AI assistants are not generally marketed as search engines. We also agree with the CMA that the line between AI-based and traditional search is increasingly blurred, which makes technology neutrality all the more important.

We particularly welcome the expectation that generative AI summaries attribute web content clearly and provide a means to access it. This matters to businesses that rely on being discovered, and is consistent with the Publisher CR.

Three clarifications would make the criteria even more predictable for applicants and straightforward for Google to apply:

- **Security standards.** We agree Google is well placed to specify minimum security standards. A summary published before each application window, aligned where

possible with existing Android and Play requirements, would let applicants prepare without disclosing anything that could weaken security.

- **Testing methodology.** The interpretative notes require a replicable test of how services respond across use cases, and that error rates are not significant. A short description of the test approach, shared with applicants and applied equally, would reduce disputes and help show that decisions are objective.
- **New entrants and Criterion 3.** We support the reference to 'UK users of the service' and welcome the proposed notes on attitudinal or behavioural evidence and on 'significant proportion'. As applicants need not give Google confidential information (note 27), the notes could also confirm that usage evidence may be aggregated or independently verified.

Question 6.1(a)(ii): *Procedural safeguards for applying the eligibility criteria*

We **support** the new procedural requirements. They respond to our February concern that criteria could be applied too restrictively, while drawing on Google's experience of running choice screens.

We welcome the CMA's intention to monitor how Google applies the criteria (para 4.33). Three light-touch additions would complete the framework:

- where Google reassesses an existing Eligible Provider (note 28), the same safeguards on notice, timing and reasons should apply, with an opportunity to respond before removal;
- the publication by Google of the list of Eligible Providers after each window, with aggregated categories of rejection reasons; and
- the inclusion in rejection letters of criterion-specific reasons, with a short opportunity to correct factual errors before the decision becomes final, so that applicants need not wait for the next application window to resolve a simple mistake.

Question 6.1(a)(iii): *Frequency of display and timing of the Search Choice Screen*

We **support** the revised approach. A skippable, visually limited annual notification linked to major updates balances keeping choice current as search changes, which we emphasised in February, against user fatigue, a concern raised by Google and others. Removing the proposed requirement to reopen the choice screen from settings is reasonable given the other measures.

We welcome the added flexibility in the proposed CR interpretative notes (notes 5 and 24). Drawing on the Thinks research, which found that unexplained prompts caused confusion, we believe the information screen preceding the one-off screen for existing Chrome users should explain why the choice is appearing during an update. Google could use user testing to choose the moment in the update journey that avoids interrupting time-sensitive tasks. We suggest that the CMA consider a narrow amendment allowing one short postponement of this screen, with mandatory completion afterwards, where user testing demonstrates a benefit.

Question 6.1(a)(iv): *Design of the option to 'test drive' search providers*

We **welcome** the retention of the test-drive, which remains an internationally innovative feature of the UK regime. The confirmation screen, the expectation of a

minimum period of one week (note 18) and ending the trial with a route to settings rather than a further trial are pragmatic changes that respond to the user research and to Google's implementation concerns.

In February we assumed an opt-in screen at the end of the trial. Under the revised design the trial provider stays as default unless the user acts. On balance this is acceptable, as it avoids unexpected changes to users' settings, provided that:

- users are told clearly before selecting the trial, on the confirmation screen and in the end-of-trial notification, that the provider will remain the default unless they change it, with a direct, straightforward route to change;
- the choice screen and confirmation screen distinguish the test-drive from a free trial or subscription and clearly explain any provider charges or query limits, with any paid sign-up requiring a separate user choice (note 15); and
- wording is tested with users, given the research finding that "Trial it" was better understood than "Test drive".

Question 6.1(a)(v): *Approach to selection and ordering of Eligible Providers*

We **support** showing all Eligible Providers where there are twelve or fewer, fully random ordering and a requirement to scroll through the full list. Where more than twelve qualify, we broadly support selecting the five most popular plus seven others at random, then ordering the selected twelve fully randomly, with the remaining providers readily accessible (note 13).

The Thinks research also found that users would prefer some structure to compare unfamiliar options. We note this could be met without a hierarchy by asking providers to write their descriptions to a short common template (for example, whether a service gives AI-generated answers with links, its privacy approach, and any charges or query limits). This builds on the CMA's expectation on charges and would help users with lower digital confidence in particular.

Selection rate is a sensible popularity metric once data is available; a review after twelve months would check it does not simply reinforce initial positions.

Question 6.1(a)(vi): *Link to the full list of Eligible Providers in settings*

We **support** this addition, which removes a practical barrier to switching outside the choice moment. Using the same plain-language list across Android settings, Chrome settings and the Play Store would keep it simple.

Question 6.1(a)(vii): *Third-party access to a user's default search setting*

We **support** the API and welcome the new ability for Eligible Providers to take users directly to the relevant default setting. This will help scale-ups and AI-first businesses engage users while they are using their service, and mirrors what already works for browsers on Android. The API should report default status as reliably and promptly as that information is available to Google's own search services. As we noted in February, privacy safeguards (read-only access, user consent) can be built in. As deep links only take users to the settings page, no additional confirmation step should be needed.

Question 6.1(b): *Updated proportionality assessment*

We **agree** with the CMA's provisional conclusion. The revised CR is less onerous for users, Google and OEMs than the January proposal, and much of it overlaps with elements Google itself offered in its "UK Choice Package" (the central default switch, prompting API, longer list and information screen). The additional elements, annual resurfacing and the test-drive, are now light-touch and address a distinct need: allowing users to revisit their choice as AI-powered search evolves.

The CMA has revised down the estimated benefit to individual users of finding a preferred provider, so the case rests more on increased competition. This is a reasonable frame, since the aim is informed choice rather than switching for its own sake. To strengthen confidence on all sides, we reiterate our February suggestions that the CMA track whether choices are sustained (for example, the share of users still with their chosen provider after six months, using privacy-preserving cohort data where technically feasible) and periodically test user understanding. We accept annual reporting after the first year where the CMA is satisfied with compliance, with increased oversight if concerns arise. A structured review, for example 12 to 18 months after implementation, would allow the CMA to strengthen or relax elements of the CR in light of evidence, including its monitoring of searches made through other access points (para 4.41), as voice, visual search and AI assistants increasingly bypass the browser search bar.

Cross-Cutting Observations

Users with lower digital confidence. The Thinks research notes that it did not recruit for all needs, such as sensory impairments. Google's user testing of the final design could include accessibility testing, with all screens written in plain English.

Learn by testing. Beyond accessibility, the design of all choice screens could improve through testing. Building on note 2 and the testing plans Google is expected to share with the CMA (para 4.115), design variants (for example, wording, descriptions, a postponement option or an 'other provider' search field) could be tested live with a small sample of users, with results shared with the CMA, so that the design improves between formal reviews on the basis of evidence.

Level up, don't degrade. As in previous submissions, we encourage an implementation that improves choice without degrading Android or Chrome. Early engagement between Google, Eligible Providers and the CMA, helped by the three months' notice of rollouts now proposed, will support this.

Conclusion

Platform Leaders supports the revised User Choice CR as a proportionate, evidence-led measure. The changes show the value of the CMA's participative approach and of user research. Our suggestions aim to make the regime predictable for applicants, simple for all users, including the most vulnerable, and practical for Google to implement.

We look forward to continuing to contribute to this work.

On behalf of Platform Leaders