**STRATEGIC MARKET STATUS INVESTIGATION INTO GOOGLE'S PROVISION OF GENERAL SEARCH AND SEARCH ADVERTISING**

**MOZILLA'S RESPONSE TO CMA's CONSULTATION ON USER CHOICE CONDUCT REQUIREMENTS**

**9 OCTOBER 2026**

Mozilla welcomes the opportunity to respond to the updated User Choice Conduct Requirement for Google's general search services (the "CR"). Our comments build on our February submission, drawing on Mozilla's experience of browser choice screens in the EU and Japan and our research into how people choose and change the services they use.

Browsers are a primary gateway to the web and one of the key tools where people access and encounter AI services. Competition between browsers gives people alternatives in how they access online services, with different features and approaches to privacy and security. Mozilla supports measures that strengthen choice and competition in search while preserving competition between browsers and browser engines.

We support informed search choice and welcome the CMA's published user research and the CMA's continued willingness to engage with the details of user interface design and its impact on competition. However, a necessary part of this approach is the implementation of browser choice alongside search choice, with research informing how the two decisions are presented together. People need to understand what they are choosing, be able to try alternatives and remain in control of their choice. The revised reminders, trial follow-up and settings routes raise questions about whether people can return to a decision and complete a change easily. As we noted in February, testing should support timely rollout and continued improvement, without delaying implementation.

**Importance of a coordinated approach to browser and search choice**

We continue to support a coordinated approach to browser and search choice and would welcome consultation on browser choice screens as soon as possible, with a view to launching both together. As noted in our previous submission, considering the two interventions together offers opportunities for consistent design, clearer user journeys and fewer interruptions.

The CMA's research found that participants often used their understanding of browsers to make sense of search choice, blurring the distinction between the two.[1] Mozilla's 2023 browser choice screen experiment found similar confusion: after completing the simulated setup, around 74% of

[1] User Research on Choice Screens in Search, CMA pp. 20–21.

participants in the browser-choice groups thought they had also selected a default search engine, although they had only been offered browser choice.[2] In other words, people who selected a default browser through a choice screen were more likely to also think that they had selected a default search engine when they had not. These findings reinforce our support for designing and testing browser and search choice together, with clear explanations of the impact of each decision.

In addition, the proposal leaves Google to decide which choice screen appears first when both are shown together and expects the information screen to explain the different choices.[3] We consider it important that a browser choice screen should be shown to users first. As we noted in February, showing search choice first could nudge users towards selecting Chrome. The accompanying explanations should distinguish the two decisions and make clear which access points the search choice affects, without implying that it changes search within independent browsers such as Firefox. We recommend that the CMA consider the design, order and timing of the two screens together through user testing, rather than leaving the order to Google. We also encourage the CMA to build on its existing work to bring forward consultation and implementation of browser choice.

**Question 6.1(a)(i): Eligibility criteria**

Our February response raised the risk that eligibility based on public awareness could disadvantage newer or less familiar providers. The September CR responds to that concern by focusing on a service's own UK users, allowing evidence of actual usage as well as survey evidence, and clarifying that a "significant proportion" need not be a majority.[4] This is a welcome change, meaning that eligibility would not depend on recognition among the wider UK public.

***Choosing and using an AI service***

One question that remains unanswered is how the CMA will assess whether people understand what choosing an AI-based service as their default search provider means in practice. Research participants questioned how they would reach websites and whether a subscription might be required, but the prototypes did not show the subsequent search experience.[5]

The proposal allows paid services to qualify if they meet the eligibility criteria, and expects provider descriptions to disclose charges or limits on free queries. We question whether people would notice and understand those conditions before choosing a service, including what happens when they reach a free-use limit.[6]

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[2] Can Browser Choice Screens Be Effective? Mozilla 2023, p 56. https://research.mozilla.org/files/2023/09/Can-browser-choice-screens-be-effective_-Mozilla-experiment-report.pdf
[3] Consultation, interpretative notes 6, 24.
[4] Consultation: CR 1.f.iii; interpretative notes 40–42, §4.25–4.27.
[5] CMA Research pp. 40–42, 46.
[6] Consultation: interpretative note 15.

**Question 6.1(a)(ii): Eligibility decisions and review**

Building on our February request for a practical review route, we would welcome clarification on how providers can seek review of an eligibility decision and the role played by the CMA. The revised proposal requires Google to provide the CMA with detailed reasons for rejection, while applicants receive written confirmation of the decision. It would be helpful to clarify whether applicants would also receive sufficient reasons to understand and, where necessary, challenge the assessment.[7]

**Question 6.1(a)(iii): Frequency and timing**

***Annual reminders***

We recommend limiting annual reminders to people whose current default search provider is Google. Doing so would ensure that this aspect of the Conduct Requirement is better designed to achieve the open choices objective of the DMCCA. Our February response raised the concern that repeated prompts could steer people who selected another provider back to Google. Making the notification dismissible does not remove that concern.[8]

The proposed six-month exemption is discretionary, time-limited and applies regardless of the provider selected. We recommend replacing it with a requirement that annual reminders must not be shown while a non-Google provider remains the default. People who return to Google would become eligible for future reminders about alternatives.[9]

***Timing of the initial choice screen***

We continue to recommend presenting choice screens when users are most likely to engage and consider alternatives. In Mozilla's simulated browser-choice experiment, selection of the pre-set browser increased from about 11% during device setup to 19% at first browser use in the high-information, five-browser conditions. This informed our February preference for choice screens at device setup or, where appropriate, major system updates.[10]

For covered new Android devices, the proposal places the initial choice screen during first use or setup. For existing Chrome users on desktop and iOS, it links the initial screen to a major update. For new Chrome installations on those platforms after that initial rollout, our February recommendation remains relevant: the screen should form part of Chrome's onboarding, before people begin browsing for a particular task. The accompanying text should make clear that using Chrome does not require choosing Google Search.[11]

[7] Consultation: CR 12, §4.33.
[8] Consultation: §4.53-4.59.
[9] Consultation: CR 3, interpretative note 10.
[10] Mozilla Choice Screen Research, p 11.
[11] Consultation: CR 2, §4.50.

**Question 6.1(a)(iv): The option to trial a search provider**

***Understanding the trial***

Mozilla strongly supports the trial option, as we set out in February, and encourages innovative approaches to user choice supported by research. The CMA's research provides further support for trials as a way to explore unfamiliar services with less sense of commitment. Some participants paid more attention to alternatives, and those who used another service before their interview reported gaining a better understanding of their preferences.[12]

We would welcome testing of whether people understand the trial before selecting it, as well as what will happen afterwards. The proposal requires an information screen before the choice screen and adds a confirmation screen for trials.[13] The trial prototype used in the research did not include a preparation screen, and some research participants only understood the trial at confirmation and wanted to return to their choice. Others questioned whether a trial might lead to payment.[14]

It would also be helpful to understand the evidence for a minimum trial of one week.[15] The CMA explains that people need time to become familiar with a service, cites research on learning about search through use, and allows for user testing and a choice of duration. Its qualitative study used a two-week trial prototype and found differing views on duration, but did not compare trial lengths.[16]

***End of trial***

The revised proposal provides a dismissible notification at the end of a trial that, if selected, takes the user to the relevant default-search settings. This notification is not required if the user deliberately changed their default during the trial. The CMA cites technical and interruption concerns and considers the initial trial sufficient, with users remaining able to switch through settings.[17]

Before starting a trial, people should understand what will happen when it ends, including what happens if they dismiss the notification or take no action. The notification should reinforce that information and explain how to access settings, without suggesting that people need to reconsider their choice. Our concern remains whether people can find the relevant settings and complete a change later if they wish, including after dismissing the notification. The published research did not test the proposed trial-end notification and subsequent route through settings.

[12] CMA Research: pp. 35–38.
[13] Consultation: CR 10–11.
[14] CMA Research: pp. 30, 35–37.
[15] Consultation: interpretative note 18; §4.71(c).
[16] CMA research: pp. 10, 13, 35–38.
[17] Consultation: CR 9; interpretative notes 19–20; §§4.71(b), 4.72(b)–(c).

**Question 6.1(a)(v): Selection and ordering of providers**

***Random ordering and scrolling***

Fully randomised ordering addresses our February recommendation to randomise across the whole displayed list. We also support requiring users to scroll through the displayed options before confirming their choice.[18]

Mozilla's browser choice experiment found that ordering affected browser selection.[19] In the CMA study, participants often missed lower options and the explanation of random order; some questioned whether position indicated quality or recommendation.[20] The proposed reporting on display position and selections can inform evaluation, alongside testing of what people notice and understand.[21]

***Inclusion and popularity***

In our February response, we considered a combination of popular providers and broader selection a reasonable starting point, while recommending fully randomised ordering. The proposal includes all providers if twelve or fewer qualify; above that number, the CMA expects five to be selected by popularity and seven at random from the remaining eligible services. Under this approach, the top five would appear on every choice screen, while other providers would appear less frequently, even where their popularity is similar to those above the cutoff. While this does allow smaller services falling outside the top twelve a path to inclusion in the choice screen, it may also unfairly penalise those services located in sixth position and above by comparison to positions one to five. Randomising positions does not address that difference. We recommend that the CMA reconsider the five-provider cutoff and assess whether access to the full list gives providers outside the displayed twelve a meaningful chance of being considered.[22]

Separately, the proposal envisages Google Play downloads as the popularity measure for the first six months, followed by the proportion of times a provider is selected when displayed. Google Play downloads may be a poor measure of search-provider popularity, since people can use many search services without downloading a separate app. We recommend that the initial measure account for actual use and selection through browsers, rather than relying on app downloads alone. Our February concern about measures that count preinstallation rather than users' decisions also remains.[23]

**Information and understanding**

[18] Consultation: CR 4; §4.85–4.86.
[19] Mozilla Choice Screen Research, pp. 42-45.
[20] CMA Research, pp. 24-27.
[21] Consultation: §4.116(b).
[22] Consultation, CR 5–6; interpretative note 13; §§4.82–4.84.
[23] Consultation, interpretative note 13; §4.83.

We continue to favour testing whether the information provided helps people understand default search and what their choice will change. The CMA study found that participants rarely expanded provider descriptions. A preparation screen was associated with more engagement, while confirmation reassured people about what had changed and their ability to change it again.[24]

Mozilla's browser choice experiment also showed the value of richer information: 64% were satisfied with the information in the high-information twelve-browser condition, compared with 56% in the low-information equivalent. At the same time, only about 52% understood the default browser's role in opening links.[25] These findings informed our February recommendation to include understanding in the evaluation of the search choice screen.

We also retain our question about the explanation of eligible providers' "key features" on the information screen.[26] It is unclear whether this is intended to explain how search services can differ in general, or to describe individual providers. In either case, it would be helpful to set out the role participants would have in shaping or checking that information, beyond supplying their short descriptions.

**Question 6.1(a)(vi): Access to providers through settings**

***Returning to a choice***

People should be able to return to their choice at a time that suits them. We supported the ability to reopen the choice screen from settings, but the revised proposal removes that requirement while retaining manual switching and access to the full provider list.[27] In that case, we would welcome clarity on how someone who dismisses a reminder can find and consider alternatives later.

The CMA's research illustrates why this matters. Some participants with lower digital confidence said they were unsure how to change their search service and continued using the default. When discussing confirmation screens, participants wanted help finding the relevant setting.[28] As we recommended in February, evaluation should consider whether people can find, understand and complete the change, as well as whether a settings route exists.

***Scope of the Android setting***

The Android setting should clearly identify which access points it changes. Describing it as a "device-level" default could suggest that it changes search everywhere, including in independent browsers. Its scope is narrower: the defined default search application, search widget and Chrome address bar. Clear labelling would help preserve the distinction we raised in February.[29]

[24] CMA Research: pp. 24, 29–34.
[25] Mozilla Choice Screen Research: pp. 51, 56.
[26] Consultation: interpretative note 23.
[27] Consultation: §4.58; CR 15.
[28] CMA Research: pp. 22, 34.
[29] Consultation: CR 1.k, 7.b and 13–14.

The CMA recognises the need to explain those consequences and expects people to be able to find the setting using terms such as “default” and “default search”. We would welcome testing of whether people understand where the change takes effect. The CMA’s research found confusion between browsers and search services, but did not test this central setting.[30]

**Google prompts**

Our February response set out concerns about when and where Google’s prompts appear – this remains relevant. Although the proposal retains the requirement for fair and balanced prompts, including that notifications of default-search changes should not ask people to switch to Google, we remain concerned about selective prompting when people move away from Google and prompts to change default search while using other Google products such as Maps or Gmail.[31] As we noted in February, safeguards need to cover how prompts are triggered as well as their wording.

**Question 6.1(a)(vii): Third-party access to default search settings**

We continue to support an API that allows eligible providers to determine whether they are a user’s default search provider, as set out in our February response.

**Monitoring and compliance**

Our February response supported reporting every six months alongside behavioural audits. September proposes annual reporting after the first year, subject to the CMA being generally satisfied with Google’s compliance. It would be helpful to understand what the CMA would consider before moving to annual reporting.[32]

Alongside any reduction in reporting frequency, we continue to recommend behavioural audits of the choice screen’s design and implementation. These could assess whether people can use the revised reminders, trial follow-up and settings routes successfully, including returning after dismissing a notification. The additional metrics on access to the full provider list and selections by display position would help assess whether alternatives are being seen and considered. Publication of non-confidential reports and performance metrics would also allow wider scrutiny.[33]

We continue to recommend that Google share user research plans and findings with the CMA before the choice screens are first rolled out. The proposal retains this expectation for subsequent changes, and we recommend applying it to the initial designs as well.[34]

[30] Consultation: §4.91–4.92; CMA research, pp. 20–21.
[31] Consultation: CR 18, interpretative note 48, §4.106.
[32] Consultation: §4.113.
[33] Consultation: §4.114–4.117.
[34] Consultation: §4.115.

Timely, usable performance data also remains important for providers, including API access where appropriate. As explained in February, delayed quarterly spreadsheets under Google's DMA implementation have limited Mozilla's ability to analyse and respond to user behaviour.

**Question 6.1(b): Proportionality**

Our February response broadly agreed with the CMA's proportionality assessment, highlighting effective, informed choice and the importance of limiting unnecessary friction. It also emphasised that the intervention should be targeted at Google-owned access points, with monitoring through reporting, user testing and behavioural audits.

The CMA provisionally concludes that the benefits, particularly from competition, are likely to outweigh the costs. Our questions about the revised reminders, trial follow-up and settings routes concern whether people can realise those benefits in practice: discover alternatives, make an informed choice and successfully change providers.

Mozilla continues to support effective search choice and encourages the CMA to build on this work to progress browser choice without delay. The CMA's Mobile Browsers and Cloud Gaming Market Investigation, together with experience of choice screens in the EU, provides a substantial foundation. We reiterate our request that the CMA consult on browser choice screens as soon as possible, with a view to launching browser and search choice together. Considering their design and timing together would help people understand the two decisions and make an informed choice about each.

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