

Submission to the CMA: User Choice Conduct Requirement

1. Introduction and summary

KARMA Search is an independent general search service operating globally. We have a direct interest in the design of the search choice screen, as it is one of the few routes by which a new search service can reach UK users at scale.

We support the CMA's objective of giving UK users effective choice over their search service. We also recognise the CMA's view that the line between AI assistants and other search services is increasingly blurred. However, we believe that listing AI assistants on the same screen as general search engines, as currently proposed, would harm users and weaken competition in general search.

Our position in brief:

1. **Default-setting harm.** Selecting a service on the screen makes it the default for every query typed into Chrome's address bar or the Android search box. Many of these queries are navigational or keyword-based, which AI assistants handle poorly.
2. **Attribution is not enough.** The proposed attribution criterion does not restore traffic to publishers or let users choose which sources they rely on.
3. **Crowding out.** AI assistants would likely take most popularity-based slots and enlarge the random pool, reducing the chance that an independent search engine is shown.

Our request: that the CMA keep the general search choice screen for general search services, and address AI assistants through a separate choice mechanism, or a clearly separated section of the screen (see section 6).

2. The choice sets the default for every query

A choice made on this screen is not a choice of which app to open. It sets the default destination for every query typed into Chrome's address bar and the Android search box. If a user picks an AI assistant, all of those queries go to it.

A large share of these queries are navigational or short keyword lookups. Some AI assistants now handle navigational queries for very large brands. They remain unreliable for less prominent sites, local businesses and small brands, which are exactly the destinations that most need to be reachable.

The likely result is a frustrating experience for users who pick an AI assistant without realising it will replace their search engine for all address-bar queries. Many would then switch back to Google, which would reinforce Google's position rather than open the market.

3. Search engines and AI assistants serve different uses

The CMA considers that the line between AI-based services and other search services is increasingly blurred. We agree that the products overlap, as Google's own AI Overviews show. But overlap in features does not make them substitutes for the default role the choice screen allocates. How people use each remains distinct:

Feature	General search engine	AI assistant
Typical query length	Short, often 3–5 words	Longer, often a full sentence or paragraph
Syntax	Keyword-based	Natural language, often a question
Interaction	Transactional: search, scan links, click	Conversational: prompt, read the answer, follow up
Desired output	Links, pages, products or a specific fact	Explanation, synthesis, recommendation, content creation or analysis

User behaviour supports this distinction. DuckDuckGo and Ecosia have reported [record switching following Google's move from links to AI-generated results](#).

Many users clearly value a links-first search experience and do not want AI answers by default.

The most useful evidence would be the share of UK users who have fully replaced a search engine with an AI assistant for all their queries. We expect this share to be very low. We encourage the CMA to measure it, building on its published user research on choice screens, before treating the two categories as interchangeable.

4. Attribution does not protect sources or user choice

We welcome the CMA's proposal that eligible services must attribute the web content behind AI summaries. It is a necessary condition, but it is not sufficient, for two reasons.

Users lose control over their sources. With a search engine, users choose which result to open, for example the BBC, The Guardian or The Sun. With an AI assistant, the service selects and blends sources, and a citation footnote does little to restore that choice.

Attribution does not restore traffic. Users who get a synthesised answer rarely click through to the cited page. The financial sustainability of news publishers and content creators depends on that traffic. Opt-out rights for publishers and attribution obligations will probably not be enough to reverse the decline. [The fall in human visits to Wikipedia is a warning for the future of reliable, crowdsourced information.](#)

If AI assistants are listed, we suggest the eligibility criteria require more than attribution. For example, prominent, clickable links to sources within the answer, and the ability for users to choose or exclude sources.

5. AI assistants would crowd out independent search engines

The proposed screen lists 12 services: five selected by popularity and seven chosen at random from the remaining eligible providers. Adding AI assistants would affect both parts.

Popularity slots. On downloads or monthly usage, the five most popular services would likely include Google Search, Gemini, ChatGPT, Microsoft Copilot and Bing. These come from three companies. Every popularity slot taken by an AI assistant is one fewer for a general search engine.

Random slots. AI assistants that qualify would enlarge the pool for the seven random slots. That lowers the chance that any given independent search engine is shown.

In short, including AI assistants risks a de facto status quo in which the largest technology companies hold most of the slots, leaving little room for new entrants in general search.

6. Proposed remedies

We propose the following, in order of preference:

1. **Two separate choice mechanisms.** Keep the search choice screen for general search services. Offer a separate choice of AI assistant, for example for the device's assistant or a dedicated entry point, rather than the address-bar default.

2. **Separate sections within one screen.** If a single screen is retained, present general search engines and AI assistants in clearly labelled sections, each with its own popularity and random slots. This prevents one category from crowding out the other.
3. **Stricter eligibility for AI assistants.** If AI assistants compete for the same slots, they should only be eligible if they reliably handle navigational and keyword queries, for example by returning a standard list of links when the query calls for one.

We also suggest the CMA tests any combined design with users before adopting it. The test should check whether users understand that choosing an AI assistant changes the default for all address-bar queries.