SAMSUNG

Samsung Response to the CMA Consultation on the revised User Choice Conduct Requirement (23 September 2026)

9 October 2026

Introduction

(1) Samsung welcomes the opportunity to comment on the CMA's further consultation of 23 September 2026 on the revised User Choice Conduct Requirement (the "Revised CR"). It should be read together with Samsung's earlier submissions in this investigation, in particular our response to the CMA's additional questions of 7 November 2025 (the "November 2025 Response"), our response to the January 2026 consultation of 27 February 2026 (the "February 2026 Response") and our response of 10 April 2026 to the CMA's request for information of 20 March 2026 (the "April 2026 RFI Response"). Where we have nothing to add to those submissions we have said so briefly rather than repeating them.

(2) Samsung responds as an Android original equipment manufacturer ("OEM") which designs, integrates and supports the search and AI experiences on Galaxy devices. The Revised CR is addressed to Google, but several of its elements would be experienced by users on Samsung devices and, depending on how Google implements them, would require engineering, validation and customer-service resources from Samsung. Our comments therefore address three things: the user experience on Galaxy devices, the implementation burden on OEMs and – above all – the interaction between the Search Choice Screen and the AI assistant experiences that OEMs have invested in and integrated on their devices.

(3) In summary:

a. **Eligibility criteria (question (a)(i)).** Samsung opposes the revised Eligibility Criteria insofar as they would allow AI assistants to be listed on the Search Choice Screen as 'search providers'. The deletion of Criterion 4 removes the only criterion that distinguished a general search service from a service for which search is one function among many, and the CMA confirms that the change is intended to open the screen to AI assistants (paragraph 4.14). The consultation does not assess what that would mean for users of devices on which an AI assistant is already integrated, for competition between AI assistants, or for the partnerships between OEMs and AI providers that have delivered on-device AI innovation; nor does it recognise that familiar AI brands on the list would draw selections away from the genuine alternative search providers the screen is meant to promote. We ask the CMA to retain a criterion requiring general search to be a core and central part of the service and, failing that, to adopt the safeguards set out in section (i) below.

b. **Other design changes (questions (a)(ii) to (vii)).** We welcome the changes that scale back the annual redisplay and 'test-drive' elements, which respond to concerns raised in our February 2026 Response. We continue to consider that a single Search Choice Screen at device set-up, supported by easily

discoverable default settings, is the most effective and proportionate design. If the remaining elements are retained, the CR and interpretative notes should state expressly that they are to be delivered through Google-managed components, without OEM device-side changes or UK-specific SKUs, and the reference to reasonable limits on in-app prompting should be reinstated.

c. **Proportionality (question (b)).** Three costs remain unexamined in the updated assessment: the effect on competition between AI assistants and on OEM–AI provider partnerships; [CONFIDENTIAL] that OEMs would bear; and the implementation cost to OEMs, which the CMA treats as 'minimal' (paragraph 5.31) without having seen Google's implementation plan. We request that the CMA obtain that plan and share it with OEMs before taking a final decision.

Question 6.1(a): the proposed changes to the User Choice CR

(i) Eligibility criteria, and associated interpretative notes, to appear on the Search Choice Screen

What the revised criteria change

(4) The revised Eligibility Criteria differ from the January 2026 proposal in five respects, each of which lowers the threshold for inclusion on the Search Choice Screen: 'search engine' becomes 'search service'; 'including' is inserted before 'by searching the web', so that web search is no longer the required means of answering queries; the 'expected' general search experience becomes a 'functioning' one; Criterion 3 is limited to 'UK users of the service'; and Criterion 4 is deleted altogether. Read together, their effect is that a service whose core purpose is not general search can qualify for the Search Choice Screen.

(5) The CMA is explicit that this is the intended result: 'provided they meet the eligibility criteria, AI assistants could in theory be able to be listed on the choice screen' (paragraph 4.14). Its reasons for deleting Criterion 4 include avoiding the exclusion of 'a service that dealt with a large number of queries across the use cases, but an even larger number of non-search queries' (paragraph 4.28(b)) – that is, a service for which search is a secondary function. Criteria 1 to 3 ask whether a service is capable of general search. Only Criterion 4 asked whether general search is what the service is actually for. Its deletion changes what the Search Choice Screen is for.

(6) In our February 2026 Response we supported the January criteria on the basis that they would confine the Search Choice Screen to providers of general search. For the reasons below, Samsung opposes the revised criteria to the extent that they would admit AI assistants, and asks the CMA to reconsider.

Why listing AI assistants on a search choice screen is the wrong outcome

(7) **Users and the device AI experience.** The CMA states that its 'focus on end users' means Google's concerns about 'free-riding' are not a relevant consideration (paragraph 4.28(c)). With respect, the concerns Samsung raised in its November

2025 Response are end-user concerns. On Galaxy devices, users already have a deeply integrated AI assistant available through the side key, Circle to Search and on-device Galaxy AI features. That assistant is selected and integrated by Samsung on a non-exclusive basis, is tested on each device model, and can be changed by the user. If a user selects an AI assistant as their 'Default Search Provider' on the Search Choice Screen, the Search Widget and the Chrome address bar will route queries to that assistant, while the AI access points configured by the OEM continue to operate as designed. The user will have two assistants responding from different surfaces of the same device according to a distinction – 'search' versus 'assistant' – that the user did not draw and was not told about. Users are likely to experience this as an inconsistency or a fault rather than as a choice, and to raise it with the device manufacturer. The consultation document does not engage with this interaction at all.

(8) **Competition between AI assistants – and the CR's own aim.** The CMA has itself described the AI assistant sector as 'relatively small, nascent and highly dynamic' (SMS Final Decision, paragraph 1.18). A Search Choice Screen that lists AI assistants alongside general search engines would shape competition in that sector without the CMA having investigated it. Most users choose on the basis of brand recognition, so the screen would tend to favour the most widely recognised assistant irrespective of its quality as a search service; access to a free, mandated distribution channel reaching tens of millions of UK devices would depend not on the quality of the assistant but on a secondary capability – web search; and providers would have an incentive to re-engineer assistants to qualify as 'search' rather than to compete on their merits as assistants. The same brand-recognition effect would also work against the CR's own aim. The CMA's rationale for the Search Choice Screen is that users rarely look beyond Google and that a well-designed screen gives genuine alternative search providers a route to users. If widely recognised AI assistants are placed on the same list, a user who is minded to try something other than Google is more likely to be drawn to a familiar AI brand than to a lesser-known search provider, reducing the probability that genuine alternative search providers are selected and leaving the competitive pressure on Google Search largely unchanged.

(9) **OEM–AI provider partnerships.** The most innovative on-device AI experiences available to consumers today – on Galaxy devices, features such as Circle to Search, Live Translate, Note Assist and Generative Photo Edit – are the product of deep, negotiated integration between OEMs and AI providers, supported by OEM investment in AI silicon and software. A mandated choice screen that distributes AI assistants without any such integration, and without compensation for the OEM investment on which the assistant runs, weakens the incentive for AI providers to enter into those partnerships and makes it harder for OEMs to recover their investment. This is a cost to future innovation that the proportionality assessment does not consider.

(10) **Scope and aim of the CR.** The Search Choice Screen is a remedy for Google's strategic market status in general search, and the aim of the CR is to improve users' ability to choose between search providers on Google-operated access points

(paragraph 2.1). Allocating AI assistant positions on Android devices is not necessary to achieve that aim. Nor does the consultation contain any assessment of the sector in which the revised criteria would intervene: it considers whether AI-based services could satisfy the eligibility wording and how users react to seeing them on a list, but not how their inclusion would affect competition between AI assistants, the integration of assistants on devices, or the partnerships through which that integration is delivered. That sector is one in which Google is not the leading provider and in which OEMs negotiate directly, and on a non-exclusive basis, with all major AI providers. If the CMA considers that intervention in the distribution of AI assistants is warranted, the appropriate vehicle is the Mobile Ecosystems SMS investigation, where the question can be examined on its own evidence and with all affected parties, rather than as a by-product of a search remedy.

(11) **Technical reality.** AI assistants are not 'plug-and-play' search services. As explained in our November 2025 Response, an assistant typically draws on information held on the device, integrates with installed applications and handles voice, image and video input and output. An assistant that has not been integrated and verified on a particular device may fail to perform these functions, may require permissions, menus and configuration that a search provider does not, and may degrade the experience of both the device and the assistant. A 'functioning' test under Criterion 2 is a test of the service as a search service on the Relevant Access Points; it does not examine the assistant functions on which the user's experience of the device depends. It is therefore unlikely to detect such failures across the range of OEM devices, and users who encounter them will attribute them to the OEM.

(12) **The evidence relied on.** The User Research does not support the change. It found that 'many users reported viewing generative AI-based services as different to traditional search services' (paragraph 4.12). That users 'engage more with the list of options' when a familiar AI brand appears on it is evidence of brand recognition, not of an informed choice between general search services; and the research 'did not seek to define what services should or should not be eligible' (paragraph 4.12). Nor does the fact that traditional search engines now incorporate AI features (paragraph 4.14) mean that AI assistants are search engines: the question is what a service is for, which is precisely what Criterion 4 asked.

Comments on the individual criteria and interpretative notes

(13) **Criterion 1 (interpretative notes 29 to 34).** We have no objection to the four categories of query, or to the requirement that generative AI summary responses clearly attribute web content and provide a means of accessing it (interpretative note 31). The insertion of 'including' should not, however, be read as removing the requirement that a provider actually search the live web for the full range of use cases; a service answering primarily from a pre-trained model is not a general search service.

(14) **Criterion 2 (interpretative notes 35 to 39).** We support the requirements for minimum security standards (interpretative note 37), enduring capability

(interpretative note 38) and technical distinctness between services of the same group (interpretative note 39). Our concern is what Criterion 2 does not test. A 'functioning general search experience' is assessed only in relation to the Relevant Access Points (interpretative note 36). If AI assistants are admitted, nothing in the criteria tests whether the assistant functions that users will actually encounter – on-device data access, application integration, voice and image input – work on the device on which the assistant is installed through the Search Choice Screen, or whether installing it as the Default Search Provider interferes with the assistant already integrated by the OEM. We therefore ask that, for any Eligible Provider offering assistant functions beyond general search, Google be required to verify on a representative range of OEM devices, before listing and again on any material change, that the service functions as a whole and does not disrupt the device's existing AI configuration, and to remove a provider that fails that verification. Google should also consult OEMs when specifying the minimum security requirements, since those requirements will govern applications running on OEM devices.

(15) **Criterion 3 (interpretative notes 40 to 42).** Limiting the test to 'UK users of the service', combined with the clarification that a 'significant proportion' need not be a majority (interpretative note 42), means that a service used mainly for purposes other than search could satisfy the criterion on the strength of a minority of its users. The criterion would then no longer show that a service has a 'track record in providing a general search service' (paragraph 4.25). We ask that a provider be required to show that a significant share of its own UK usage consists of general search queries, and not merely that some of its users sometimes use it to search.

(16) **Criterion 4.** For the reasons above, Samsung asks the CMA to retain a criterion requiring that general search be a core and central part of the service as operated and offered to users. If the CMA considers the January wording insufficiently forward-looking (paragraph 4.28(a)), the criterion could be re-expressed – for example, by reference to the proportion of the service's UK usage that consists of general search queries, or by requiring that general search be the primary function through which the service is offered on the Relevant Access Points – rather than deleted.

Samsung's requests

(17) Samsung therefore asks the CMA to:

a. retain a criterion requiring general search to be a core and central part of an Eligible Provider's service, re-expressed if necessary, and confirm in the interpretative notes that AI assistants whose primary function is not general web search are not Eligible Providers;

b. in any event, before taking a final decision, assess the effects of listing AI assistants on users of devices with an integrated AI assistant, on competition between AI assistants and on OEM–AI provider partnerships, and consult OEMs and AI providers on that assessment; and

c. if the CMA nonetheless proceeds on the basis of the revised criteria, provide

in the CR or interpretative notes that (i) selection of an Eligible Provider through the Search Choice Screen, the Device-Level Default Setting or the 'test-drive' function affects only the Relevant Access Points and does not alter any AI assistant or other access point configured by the OEM; (ii) the information screen and each provider's short description make that clear to users; (iii) under Criterion 2, any Eligible Provider offering assistant functions beyond general search is verified, on a representative range of OEM devices, as functioning as a whole and as not disrupting the device's existing AI configuration; and (iv) under Criterion 3, each Eligible Provider demonstrates that a significant share of its UK usage consists of general search queries.

(ii) Procedural safeguards for the process of applying the eligibility criteria

(18) Samsung supports the procedural requirements now set out in paragraph 12 of the Revised CR and interpretative note 28 – advance public notice, a defined application window, a two-month decision deadline, written decisions to applicants and detailed reasons to the CMA for any rejection. As stated in our February 2026 Response, we consider it appropriate for Google to apply the criteria provided that its assessment is transparent, reasonable and objectively justified, and these safeguards go a long way to securing that. Given the importance of the eligibility decisions to third parties, we would also support the CMA publishing, or requiring Google to publish, the list of Eligible Providers and a non-confidential summary of the basis on which each was approved.

(19) Our support for six-monthly approval rounds remains conditional on the point made in February: additions to or removals from the list of Eligible Providers, and any consequential changes to the Search Choice Screen, the full-list view under paragraph 6.b or the Play Store pathway under interpretative note 45, must be delivered through Google-managed, server-side or Play-updatable components and must not require OEM firmware updates, re-certification or additional device validation every six months. We ask that the interpretative notes say so expressly and that Google be required to notify OEMs, as well as Eligible Providers, of each change to the list.

(iii) Frequency of display and timing of the Search Choice Screen

(20) Samsung welcomes the following changes, each of which responds to concerns raised in our February 2026 Response and April 2026 RFI Response: (a) limiting the annual redisplay on Android to New Relevant Devices; (b) converting it from a non-skippable screen into a skippable and visually limited notification; (c) linking it to a major update rather than a fixed date on which tens of millions of devices would be prompted simultaneously; (d) removing the obligation to allow the Search Choice Screen to be re-triggered from settings; and (e) extending the six-month exemption to users who have deliberately selected or changed their Default Search Provider.

(21) Our position on the underlying question is nevertheless unchanged. The CMA has not identified evidence that a user who chose a provider at set-up, and who has not

revisited that choice during the year despite easily accessible settings, will benefit from being prompted again. The CMA's own revised analysis values the benefit of a better-matched provider at between £4.22 and £14.77 per device (paragraph 5.42) and accepts that engagement with a skippable redisplay will be below the 1% switching rate found in the literature (paragraph 5.52). The User Research confirms that users need clear context when prompted outside set-up and that some would prefer to skip or defer the prompt (paragraph 4.49). A notification that most users dismiss is a cost to those users and to OEMs, in fatigue, confusion and customer-service contacts, with little offsetting benefit. A single, well-designed Search Choice Screen at set-up, with discoverable default settings thereafter, remains the proportionate design.

(22) If the annual redisplay is retained, we ask the CMA to address the following points in the CR or interpretative notes:

a. **Google-managed delivery.** Paragraph 4.48(b) records that OEMs indicated implementation should be through Google-managed components, and the CMA's conclusion at paragraph 5.31 depends on that being so. The obligations in paragraphs 2.c.ii, 3, 8 and 9 should be stated to rest solely with Google and to be discharged through Google Mobile Services, Google Play Services, Chrome or other components updatable without OEM involvement, and Google should not require OEMs to create UK-specific software builds or SKUs. As stated in our April 2026 RFI Response, Samsung does not produce UK-specific SKUs today.

b. 'Major update'. Interpretative note 7 helpfully states that nothing in the CR requires Google to alter the dates of its major updates. The same should be true for OEMs. The device scope, timing, content and validation of OS upgrades and major One UI releases are determined by OEMs. The redisplay must not require OEMs to issue a software update for a device for which no update is otherwise planned, nor become a gating item for, or introduce UK-specific delays into, releases that are planned. The notes should confirm that a 'major update' can be satisfied by a Google-controlled component update and does not require an OEM OS upgrade.

c. **Definition of 'New Relevant Device'.** Paragraph 1.i defines this as a device 'distributed' after the CR fully comes into force. Devices are manufactured, shipped, sold and first set up at different times, often months apart, and the same software build serves devices sold before and after any given date. Requiring software changes to a device model that has already been launched and is on sale is a significant burden for a manufacturer: each change must be developed, tested and certified for every affected model and variant, and distributed to devices already in users' hands. The trigger for a 'New Relevant Device' must therefore not require an OEM to rework the software build of a device model that is already being manufactured or distributed at the in-force date, and the CMA should confirm that device models launched before that date are not expected to receive different

firmware.

d. **Six-month exemption.** Google has stated that it cannot currently identify devices set up in the previous six months or track user-initiated switches (paragraph 4.47(c)). The exemption should be implemented using Google-held signals; OEMs should not be asked to log or report users' default-setting changes.

e. **Notification design.** The notification should follow Android notification conventions, be dismissible with a single action, not be re-posted after dismissal within the same annual cycle, and be user-tested before rollout.

(23) We note the clarified definitions of Relevant Browser and Relevant Device (paragraph 4.59). The revised definition of Relevant Device will capture substantially all Galaxy devices sold in the UK, which underlines the importance of the points above.

(iv) Design of the option to 'test drive' search providers on the Search Choice Screen

(24) Samsung welcomes the changes made to the 'test-drive' function: limiting it on Android to New Relevant Devices; the mandatory confirmation screen (paragraph 11), which addresses the risk that users do not understand the difference between 'set as default' and 'test-drive'; replacing the end-of-period choice screen with a skippable notification linking to the relevant default setting; removing repeated 'test-drives'; and the exemption where the user has deliberately changed their default during the 'test-drive' period (interpretative note 20).

(25) Our fundamental concern, set out in the November 2025 and February 2026 Responses, remains. Time-limited user-experience states are something Samsung avoids as a matter of UX principle, because users forget that a trial is running and attribute the resulting change or notification to a device fault. [CONFIDENTIAL] If AI assistants were eligible, the risk would be compounded: a user 'test-driving' an assistant as their search provider would experience the dual-assistant inconsistency described in section (i) during the trial.

(26) If the function is retained, we ask that:

a. the confirmation screen and the end-of-period notification identify the 'test-drive' as a feature of the Search Choice Screen provided by Google, explain what will and will not change on the device, and direct users who need help to Google rather than the device manufacturer;

b. the interpretative notes confirm that no state of the device is 'locked' during the period – users remain able to change the provider on any access point, add or remove widgets and install or uninstall applications – and that the notification shown where a user has deleted the Search Widget (interpretative note 20) does not attempt to restore the widget or otherwise reverse the user's action;

c. the function be delivered entirely through Google-managed components and

tested on OEM devices before rollout.

(v) Approach to selection and ordering of the Eligible Providers on the Search Choice Screen

(27) As noted in February, twelve options with descriptions remain at the upper end of what users can readily process on a smartphone screen. The new requirement to scroll through the full list before confirming (paragraph 4) mitigates the risk that options at the bottom are never seen, but adds friction, particularly on smaller displays and for less confident users. We ask that Google be required to user-test the Search Choice Screen as a whole – twelve descriptions, forced scroll and the 'test-drive' button – on a range of OEM form factors, including foldable and tablet devices, before rollout. Interpretative note 14 currently requires Google to take account of technical implications and the choice design principles only when designing the function for viewing the remaining providers; that expectation should apply to the design of the whole Search Choice Screen.

(28) We agree that a provider which charges users or limits free queries should say so in its short description (interpretative note 15); users who meet a paywall after selecting a provider are likely to contact the device manufacturer. For the same reason, if AI assistants were eligible, their short descriptions should state clearly that selecting the service as 'Default Search Provider' does not change the device's AI assistant.

(vi) Inclusion of a link to the full list of Eligible Providers in the Device-Level Default Setting and Browser Default Setting

(29) Samsung reiterates its cautious support for a Device-Level Default Setting, on the conditions stated in February: it must be easy to understand, and it must not make it harder for users to change the provider for a single access point. Interpretative note 43 confirms that the existing per-access-point journeys will be retained, which we welcome, as we do the proposal that search terms such as 'default search' surface the setting in device search (interpretative note 44).

(30) We have no objection to the new paragraph 15 provided that (a) the pathway to the full list is implemented as a link to a Google-maintained list, for example in the Play Store (interpretative note 45), so that changes in the list do not require device software changes; and (b) the Device-Level Default Setting itself continues to list only providers actually installed on the device, so that a user cannot select a provider that is not yet functional. Because the Device-Level Default Setting sits within Android system settings on OEM devices, we ask the CMA to confirm that Google will provide it through Google Mobile Services or a modular component and will give OEMs the technical specification, integration guidance and reasonable lead time before rollout. Samsung has not received any implementation detail from Google to date.

(vii) Third-party access to a user's default search setting

(31) Samsung continues to support an API allowing Eligible Providers to determine whether they are the user's default, subject to user consent (interpretative note 47) and appropriate privacy protections, and welcomes the confirmation that it could be

provided on a similar basis to the existing browser default API on Android (interpretative note 46).

(32) The Revised CR goes further than the January proposal in two respects: it gives Eligible Providers the ability to take users directly to the Browser Default Setting, the Chrome default setting or the Device-Level Default Setting (paragraphs 16.b and 17.b), and it removes the reference to reasonable limits on how often users may be prompted (paragraph 4.101). We have three concerns:

a. **Prompt frequency.** In February we supported the CMA's original proposal that there be reasonable limits on prompting. Removing that safeguard means that, in principle, each installed Eligible Provider may prompt the user to change their default every time its application is opened or its widget used. Combined with the Search Choice Screen, the annual notification and the 'test-drive' notification, this materially increases the prompt load on the device – the 'user fatigue' risk the CMA has otherwise sought to reduce (paragraph 4.48(a)). If AI assistants were eligible, the effect would be magnified, since an assistant application is opened far more often than a search application. We ask the CMA to reinstate an expectation that in-app prompting be reasonable and consistent with the 'targeted' and 'balanced' choice design principles, and to monitor prompt volumes through Google's compliance reporting.

b. **Security of deep links into system settings.** A deep link from a third-party application into Android system settings is a sensitive capability. It should be available only to approved Eligible Providers, should not be capable of changing a setting without an explicit user action within the settings screen, and should be designed by Google so as not to expose OEM devices to abuse by applications that are not Eligible Providers.

c. **Implementation.** As with the Device-Level Default Setting, the API and deep-link targets should be provided by Google through Google-managed components with published specifications and should not require OEM-specific implementation.

Question 6.1(b): the updated proportionality assessment

(33) Samsung welcomes the revisions to the proportionality assessment, in particular the CMA's decision, in light of Google's submission, to replace the £149.10 per-device benefit figure relied on in January with the more conservative estimates of £4.22 and £14.77 per device (paragraphs 5.42 and 5.43). On those figures the 'preferred search provider' benefit is of 'a similar magnitude to the total costs' (paragraph 5.46), so that the case for the Revised CR rests principally on the competition benefit, which the CMA does not quantify directly but supports with an illustrative break-even calculation (paragraph 5.47). In that context, costs which the assessment does not capture matter.

(34) The assessment does not factor in three significant costs:

a. **Effects on an adjacent market and on the CR's own aim.** The assessment does not consider the effects, described in section (i), of listing AI assistants on users of devices with an integrated assistant, on competition between AI assistants or on OEM–AI provider partnerships and the investment and innovation they support; nor does it consider that familiar AI brands on the list may reduce, rather than increase, the selection of genuine alternative search providers. These effects are unquantified, potentially large and entirely unexamined. A remedy whose quantified benefits are of 'a similar magnitude' to its quantified costs should not carry an unassessed cost of this kind.

b. **Customer-service costs.** The assessment does not include the cost to OEMs of handling user enquiries generated by the annual notification, the 'test-drive' function, and – if AI assistants are eligible – the dual-assistant inconsistency. Users experiencing unexpected behaviour on a Galaxy device contact Samsung, not Google. [CONFIDENTIAL]

c. **OEM implementation costs are assumed, not evidenced.** The conclusion at paragraph 5.31 that OEM costs beyond business-as-usual are 'minimal' rests on the assumption that Google will deliver all features through Google-managed components. As the CMA records at paragraphs 4.48(b) and 5.30, OEMs – including Samsung in its April 2026 RFI Response – could not assess this because Google has not shared its implementation plan. We ask the CMA to require Google to provide that plan, to share it with OEMs and to allow OEMs to comment before reaching a final view on proportionality.

(35) Three further points bear on the assessment. First, by valuing the cost to users solely by the seconds spent on the screen, the assessment disregards the costs of user interruption, fatigue and confusion – effects which respondents and the CMA's own User Research identify (paragraphs 4.48(a) and 4.49) – and the resulting customer complaints, which fall on OEMs rather than on Google. Second, even on the revised approach, the analysis compares each element against the total costs of the CR rather than identifying the incremental benefit of the annual redisplay or the 'test-drive' function over a set-up-only Search Choice Screen; given the CMA's own expectation that engagement with a skippable redisplay will be below 1%, that incremental case has not been demonstrated. Third, the CMA notes that Google has produced no evidence that the presence of a choice screen influences a user's choice of operating system (footnote 149). That may be true of a single screen at set-up. The cumulative effect of prompts, notifications and time-limited states that would apply on Android but not on iOS is a different matter, and it supports keeping those elements to the minimum necessary.

Compliance and monitoring

(36) Samsung has no objection to the revised reporting cadence (six-monthly in the first year, annual thereafter) or to the additional metrics proposed. We ask that the three-month advance notice Google is expected to give Eligible Providers of the initial rollout and each annual redisplay (paragraph 4.115) be extended to OEMs, together

with the technical specifications for any component that will run on OEM devices, so that OEMs can validate the user experience on their devices and prepare customer-service materials in advance, if applicable. We would also welcome the inclusion of OEMs in the CMA's ongoing stakeholder engagement on the User Choice CR, and the CMA's proposed behavioural audits being conducted on a range of OEM devices.

Concluding remarks

(37) The Revised CR is, in Samsung's view, a clear improvement on the January 2026 proposal in its treatment of the annual redisplay and the 'test-drive' function, and reflects genuine engagement by the CMA with the concerns of OEMs and end users. It is, however, a step backwards in one important respect. The revised Eligibility Criteria would turn a general search remedy into a mechanism for allocating AI assistant positions on Android devices – in a sector the CMA has not assessed, in which Google is not the leading provider, and in which OEMs have invested heavily in integrated, non-exclusive AI experiences that users value – while making it less, not more, likely that users select a genuine alternative search provider. We ask the CMA to retain a criterion requiring general search to be a core and central part of the service and, in any event, to assess the consequences for users, OEMs and competition between AI assistants before taking a final decision.

(38) Samsung remains available to engage further with the CMA on these issues, including on the technical implementation of any element that will appear on Galaxy devices, and would welcome the opportunity to review Google's implementation plan when it is available.