Access to the submission cited in paragraph 2.5

In preparing this response, I sought the Preiskel & Co letter cited in footnote 8, submitted on behalf of the Independent Media Association, Independent Publishers Alliance, Impress Media and Movement for an Open Web. The Independent Media Association's account dated 29 July 2026 identifies a letter dated 10 July 2026 concerning these issues.[6]

I could not locate a publicly accessible copy through the CMA case index, the published consultation-response collections checked, or the relevant organisations' webpages reviewed. I found related earlier submissions, but not that particular letter. This is a limitation of my search, rather than a claim that the document has not been published.

Please provide a direct link or a non-confidential copy, if available. Access would assist respondents in understanding the evidence behind paragraphs 2.5–2.7. My comments below rely on the CMA's description and the separately identified sources, rather than attributing unverified arguments to the missing letter. Please treat this response as submitted independently of that document request.

Overall position

I support measures that make choosing and changing a search provider easier, more informed and effective. Competition should give people meaningful control over their search experience, including access to original sources, understandable privacy choices and alternatives suited to their needs.

I broadly support the proposed requirement, subject to the safeguards below. I also ask the CMA to investigate persistent user controls over AI-generated search features, following its invitation for further evidence in paragraphs 2.5–2.7.[1]

1. Eligibility and procedural safeguards — questions 6.1(a)(i)–(ii)

Eligibility should be technology-neutral. An AI component should neither automatically qualify nor disqualify a service. Assessment should establish whether it performs the relevant search functions, while ensuring users understand material differences between services.

Google's role in assessing competitors creates a conflict that requires effective oversight. Applicants should receive clear criteria, proportionate evidence requirements, reasoned decisions and a timely route to independent CMA review. Smaller providers should not face disproportionate research or administrative costs.

Security requirements should be published, objectively justified and consistently applied. They must protect users without becoming a discretionary barrier to competitors. Applicants should have an opportunity to correct remediable problems.

The CMA should also examine whether six-monthly admission rounds unnecessarily delay entry and consider applications between rounds.

2. Timing, accessibility and trials — questions 6.1(a)(iii)–(iv)

The commissioned user research identifies rushed decisions, missed information, uncertainty about unfamiliar services and the importance of reversibility. Its qualitative findings are useful for design, but should not be treated as population-wide estimates.[2]

Choice screens should explain, in plain language, what will change and how to change it again. Testing should include people with low digital confidence, screen-reader users and people with cognitive, visual or motor accessibility needs. Success should mean that users understand and can implement their preferences.

Prompts should explain why they appear and respect the user's attention. Dismissible reminders should remain easy to revisit through clearly discoverable settings.

I support a trial option, provided users are told before choosing it which settings change, how long it lasts, what happens if they ignore the final notification and how to restore their previous provider. Ordinary default selections must also be clearly described as reversible. Neither updates nor trial completion should silently override a deliberate choice.

3. Provider selection, ordering and access — questions 6.1(a)(v)–(vi)

I support randomised ordering and access to the complete eligible-provider list. However, random ordering does not eliminate unequal exposure where popular providers are guaranteed inclusion and others rotate.[1]

The CMA should audit inclusion rates as well as position, and examine whether popularity measures reinforce advantages created by previous defaults or distribution arrangements. Users should be able to find a preferred eligible provider easily, even when it is absent from the initial display.

Comparable descriptions should cover material features, including charges or query limits, the presentation of AI-generated answers, access to source links and available privacy controls. Information should be concise and expandable, rather than overwhelming.

Any requirement to scroll through the list must work with assistive technology and keyboard navigation. Scrolling is not, by itself, evidence of understanding.

4. Default-setting access and privacy — question 6.1(a)(vii)

I support tools that help an alternative provider explain how to become the default. However, access should disclose only whether the requesting provider is the default—not another provider's identity, browsing history or unrelated information.

The CMA should require safeguards against using default-status checks for profiling or tracking. Opening settings must not itself change a default: that should require a clear user action. People should also have an effective way to dismiss repeated requests without losing access to the service.

5. Proportionality and enforceable compliance — question 6.1(b)

I support proportionate intervention, but do not independently endorse the consultation's numerical cost-benefit estimates.

Assessment should consider both implementation costs and the continuing burdens on users of confusing interfaces, repeated prompts and ineffective switching. Accessibility testing and independent oversight are necessary to establish whether the remedy works.

I welcome the proposed public compliance reporting.[1] Monitoring should measure understanding, successful switching, persistence of choices and problems across devices and accessibility needs. Independent behavioural testing should complement Google's reports. Mozilla's earlier submission also supports evaluating user understanding and auditing the complete user journey.[3]

Reduced reporting frequency should depend on demonstrated compliance and effectiveness. Material failures should trigger prompt investigation, corrective action and published explanations.

6. Separate controls over AI-generated search features

Choosing between providers and controlling features within a provider are distinct decisions. A person may value a provider's search results while preferring to consult original sources without an automatically displayed AI summary.

Google's published guidance states that AI Overviews cannot be turned off, although users can select the Web filter after searching. DuckDuckGo documents controls to disable or reduce its AI features.[4][5] These examples support examining persistent controls as a practical option; they do not establish Google's implementation costs or quantify UK demand.

I ask the CMA to assess a clear, accessible and persistent setting allowing users to choose whether AI-generated answers appear automatically. Users should remain free to enable those features when wanted, and their preferences should be respected across subsequent searches and updates.

If the CMA considers this outside the present requirement's aim, it should undertake a time-bound evidence-gathering and testing exercise, publish its findings and explain its decision on further measures. That work should proceed alongside implementation of provider-choice safeguards.

I do not claim that most UK users want AI features disabled. My recommendation is that users with different preferences should have meaningful control, supported by evidence about comprehension, usability and outcomes.

Sources

[1] CMA, *Consultation: User Choice Conduct Requirement*, 23 September 2026, particularly paragraphs 2.5–2.7, sections 3–4 and section 6: https://www.gov.uk/government/consultations/googles-general-search-services-proposed-user-choice-conduct-requirement

[2] Thinks Insight & Strategy, *User research on choice screens in search*, April 2026, published with the consultation; especially pages 3–4, 35–42 and 46–47: https://assets.publishing.service.gov.uk/media/6ab2903ba9c3d267bccced0e/user_research_on_choice_screens_in_search.pdf

[3] Mozilla, response to the January 2026 conduct-requirements consultation, particularly pages 6 and 9: https://assets.publishing.service.gov.uk/media/69b970db26909a1423961290/Mozilla.pdf

[4] Google Search Help, *Find information in faster & easier ways with AI Overviews in Google Search*, accessed 3 October 2026: https://support.google.com/websearch/answer/14901683?hl=en

[5] DuckDuckGo Help, *Opting Out of DuckDuckGo AI Features*, accessed 3 October 2026: https://duckduckgo.com/duckduckgo-help-pages/ai-features/opting-out-of-ai

[6] Independent Media Association, *Publishers urge CMA to rethink Google AI Overviews rules over "two-sided market" concerns*, 29 July 2026: https://www.ima.press/publishers-urge-cma-to-rethink-google-ai-overviews-rules-over-two-sided-market-concerns/