Competition and Markets Authority
By email: searchsms@cma.gov.uk

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Google's general search services: proposed user choice conduct requirement

Trainline welcomes the opportunity to share a response on the revised User Choice conduct requirements from the Competition and Markets Authority (the "**CMA**") as applied to Google's general search services under the Digital Markets, Competition and Consumers Act (the "**Act**").

Trainline is a British listed tech innovator, offering customers around the world a leading independent travel platform to purchase rail & coach tickets from over 270 operators across 40 countries. Through our highly rated website and mobile app, people can seamlessly search, book and manage their journeys all in one place. We help customers find the best value fares for their journey, alongside smart, real time travel information. Independent online retailers like Trainline play a crucial role in driving the transition to sustainable mobility, expanding consumer choice and driving economic growth, due to substantial investment in digitalisation, innovation and online marketing.

We welcome the revised proposals, which reflect many of the points set out in our response, dated 6 March 2026 (our "**March Response**"), to the CMA's original consultation on the proposed conduct requirements applying to Google's general search services. In particular, we support:

- extending coverage to Chrome on desktop and iOS;
- the device-level default setting;
- fully randomised order on the choice screen;
- the default-status API with deep-linking.

However, as the CMA has revised the User Choice conduct requirements, we would note that the points set out in our March Response continue to persist. Specifically, we would draw attention to the following three areas:

1. **Redisplay, 'test-drive' and the device-level default setting**

We encourage the CMA to retain these measures in the face of Google's objections on cost and user fatigue. We agree with the CMA that a single choice at set-up "does not allow for a user's preference to change over time" (paragraph 4.52), that the 'test-drive' allows users to discover new providers at the moment they are actively considering their choice (paragraph

4.69), and that a short annual prompt is not onerous for users already familiar with regular prompts, including from Google (paragraph 4.53). A single Device-Level Default Setting is equally important: fragmented settings create cumulative friction that makes switching possible in principle but not in practice.

Our concern is the decision to limit redisplay and the 'test-drive' on Android to new (pre-market) devices (paragraphs 4.54 and 4.72(a)). As our March Response noted, one-time choice is insufficient in a market characterised by long device lifecycles. On the CMA's own analysis, new devices represent roughly [15–35]% of the Android installed base each year (footnote 162), so the majority of existing Android users would not see an annual redisplay or be offered a 'test-drive' for several years.

We therefore propose that the CMA retains these measures as proposed and sets a defined review point (for example, alongside Google's first compliance report) at which Google must explain whether and how redisplay and the 'test-drive' can be extended to existing Android devices.

2. **Default-status API**

We welcome the retention of the default-status API and its expansion to allow Eligible Providers to take users directly to the relevant default setting (paragraphs 4.98 to 4.100). This addresses a clear asymmetry: Google knows whether it is a user's default, while its rivals do not.

The proposed interpretative notes provide that the API "could be provided on a similar basis to the API provided in the context of browsers on Android Devices" (interpretative note 46). That is a sensible implementation reference, but not the right benchmark for effectiveness. As set out in our March Response, the relevant standard is the visibility Google itself has of default status. The notes also anticipate a user consent step (interpretative note 47); the design of that step is itself choice architecture and, if framed or placed in a way that discourages consent, could undermine the API in practice.

We therefore propose that the interpretative notes confirm that Eligible Providers will have access on terms equivalent to Google's own internal visibility, in real time or close to it, and that any consent step is subject to the choice design principles and is no more onerous than any equivalent step affecting Google's own services.

3. **Eligibility oversight**

We welcome the more explicit procedural safeguards at paragraph 12 of the User Choice CR, including advance notice, a defined decision timetable and written reasons for rejections provided to the CMA. However, these give the CMA visibility of Google's decisions after the

event rather than an effective remedy: the CMA describes them as allowing it to "monitor how Google is running the process and applying the eligibility criteria" (paragraph 4.33). Given Google's dual role running the application process and determining eligibility, whilst also acting as a participant and competitor, we continue to consider, as in our March Response, that the CMA should retain the ability to intervene where exclusion decisions appear unjustified or strategically motivated. The same applies to the minimum security requirements that Google is to specify as part of the second eligibility criterion (interpretative note 37), which should be objectively justified, necessary, proportionate and subject to the same oversight.

We also note that paragraph 12.c.ii requires Google to give detailed reasoning for any rejection to the CMA, but only confirmation of the final decision to the applicant. An applicant that does not know why it was rejected cannot remedy any deficiency in a later application window or raise an informed concern with the CMA.

We therefore propose that:

- rejected applicants receive the same reasoning as the CMA, subject only to protecting third-party confidential information;
- Google retains sufficient documentation of each assessment, including any security requirement relied on, to allow independent review; and
- the CMA confirms in its final decision that applicants may raise concerns with it directly, and how it will review them and, where appropriate, require Google to reconsider a decision ahead of the next application window.