STRATEGIC MARKET STATUS INVESTIGATION INTO GOOGLE'S MOBILE PLATFORM

Final Decision

22 October 2025

CMA
Competition & Markets Authority

Website: www.gov.uk/cma

The Competition and Markets Authority has excluded from this published version of the provisional findings report information which the inquiry group considers should be excluded having regard to the three considerations set out in section 244 of the Enterprise Act 2002 (specified information: considerations relevant to disclosure). The omissions are indicated by [✂]. Some numbers have been replaced by a range. These are shown in square brackets. Non-sensitive wording is also indicated in square brackets.

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1. SUMMARY

Our decision

1.1 The digital markets competition regime[1] gives the Competition and Markets Authority (**CMA**) the ability to designate a firm as having 'strategic market status' (**SMS**) in a digital activity linked to the UK.

1.2 Having carried out an investigation and consulted Google and other stakeholders, we have decided to designate Google as having SMS in the provision of its **Mobile Platform**. This document explains the reasons for our decision.[2]

1.3 Our finding that the criteria for SMS designation are met does not find or assume wrongdoing and does not make any assumptions about the next steps after designation. The SMS assessment is purely focused on the power and position of the firm in respect of the digital activity being investigated. It is an important step as designation is the gateway to possible interventions, but Parliament clearly separated the assessment of designation from the assessment required for the imposition of Conduct Requirements or Pro-Competition Interventions, which are subject to separate legal processes.

Why Google's Mobile Platform matters

1.4 Almost all adults in the UK have access to a mobile device[3] (a smartphone or tablet) and almost all of these Mobile Devices use a Mobile Platform provided by Google or Apple. Mobile devices with Apple's Mobile Platform have a [50-60]% share of supply and those with Google's Mobile Platform, which also include Mobile Devices made by other Original Equipment Manufacturers (**OEMs**) like Samsung, have a [40-50]% share. Consumers use the Mobile Platform on their Mobile Devices to access, view and engage with digital content and services – for example to browse the internet, engage and communicate with friends on social networks, watch videos and play games.

1.5 Google's Mobile Platform is therefore a vital gateway for hundreds of thousands of UK businesses distributing digital content and services to consumers on

[1] The Digital Markets, Competition and Consumers Act 2024 (the **Act**).
[2] We have also published an 'SMS decision notice' on the case page.
[3] Uswitch; UK Mobile phone statistics 2025

Mobile Devices.[4] Some of these businesses compete with Google, which itself produces digital content and services for consumers, for example Google Search, Google Maps and YouTube.

1.6 The UK has a vibrant app developer community, representing Europe's largest app economy by revenue and app developer count. In total, the UK app economy generates an estimated 1.5% of the UK's GDP while supporting approximately 400,000 jobs across direct, indirect and other supporting functions.[5] It is essential that this part of the digital economy works well, creating opportunities for all market participants, large and small, to invest, innovate and grow. And when this market works well in the UK, it creates more opportunities for UK app developers to compete globally.

1.7 In addition, many UK businesses today use a native app as a key part of their digital offering – from transport to takeaways, retail, finance and fitness. These businesses range from large corporates to small start-ups across many different sectors of the economy. Some businesses distributing digital content and services may rely on native apps as their main channel to reach customers, without a website or physical store. This includes those operating in key growth areas of the economy like gaming and fintech, for example:

(a) The FinTech sector plays a positive role in contributing to UK growth, with over 76,000 jobs, over half of all UK unicorn companies (more than any other sector), and more than £18bn of inward investment over the past three years.[6]

(b) The UK video games sector contributes £6bn of Gross Value Added annually and supports 73,000 jobs. Within this, mobile gaming is the fastest growing segment, with 34% of UK users playing games on

[4] In the UK in 2024, there were [2-3] million native apps on the Play Store, [0-1] million app developers distributing via the Play Store and [2-3] million users downloaded a native app on the Play Store each day. See Appendix A.
[5] See Comments of ACT the App Association to the CMA regarding its SMS Investigations into Apple's and Google's mobile ecosystems and Deloitte: the App Economy in Europe; we note that Apple is a sponsor of ACT, the App Association; GDP contribution includes direct economic impact (direct revenue earned by companies in the sector), impact due to spillover effects (the rise of M-commerce), and indirect impact (wealth beyond the companies in the app industry, including other productive sectors and households); jobs estimates cover direct jobs (software developers, mobile app specialists), indirect jobs (suppliers to the app developers) and induced jobs (jobs created by the spending of the direct and indirect jobs).
[6] See FinTech Investment Landscape 2023 and UK FinTech Retains Second Spot in Global Investment Rankings Amidst Tough Market Conditions.

Mobile Devices (up from 19% in 2016)[7] and spending nearly £2bn per year on mobile games.[8]

1.8 It is therefore essential for a wide range of UK businesses and their customers that competition works well in relation to Google's Mobile Platform. And where this is the case, it is expected to deliver positive growth, investment and innovation opportunities for the UK economy.

1.9 Given the important role Google's Mobile Platform plays as an essential gateway for UK mobile users accessing digital content and services, and for UK businesses developing and distributing digital content and services for mobile, it is imperative that these groups are treated fairly and have trust and confidence in their ability to use it. It is important that Google ensures that users of its Mobile Platform have open choices, enabling content providers to compete on a level playing-field and ensuring users have access to a wide range of innovative content and services to meet their needs.

1.10 For businesses, effective competition within Google's Mobile Ecosystem would mean that content providers could bring services to consumers on terms that enable them confidently to maximise investment and innovation. This could include compelling offers in areas as diverse as fintech, gaming or connected devices. For users, effective competition would ensure access to the widest range of services at attractive prices.

1.11 Designating Google with SMS in relation to its Mobile Platform enables us to consider whether it is necessary and appropriate to introduce proportionate, targeted interventions to ensure that UK app developers and innovators developing and distributing content via Google's Mobile Platform are able to innovate and grow their businesses. Before introducing such interventions, we are required to carry out further public consultation on their terms and impact.

Basis of our decision on designation

Description and scope of the digital activity, and international context

1.12 Under the digital markets competition regime, an SMS designation applies to a 'relevant digital activity', rather than an entire firm. This ensures that we take a targeted approach, focusing on the areas where a firm has substantial and

[7] See Mobile phone gaming penetration in the United Kingdom (UK) from 2009 to 2024 (Statista).
[8] See Time to press start on growth – Unlocking the full potential of the UK video games industry (May 2025), UKIE.

entrenched market power (SEMP) and a position of strategic significance (POSS).

1.13 In line with the statutory timetable, we have carried out an in-depth nine-month investigation, during which we have considered a large amount of evidence and engaged extensively with many stakeholders, including Google, through an invitation to comment, meetings, roundtables, and information requests. We consulted publicly in July on our proposed decision, and Google had the opportunity to make oral representations to CMA decision-makers on this.

1.14 Having taken into account consultation responses, and gathered and considered further evidence, we have decided that Google meets the test for SMS in respect of its Mobile Platform: the combination of its Mobile Operating System (Android), Native App Distribution (Play Store) and Mobile Browser and Browser Engine (Chrome and Blink) on Mobile Devices.

1.15 We define the scope of these activities as follows:

(a) **Mobile Operating System** – the provision of an operating system or equivalent, which acts as an intermediary between hardware and software on a mobile device, enabling software applications and services to run on the mobile device.

(b) **Native App Distribution** – the provision of a service which enables the installation, distribution and operation of native apps on Mobile Devices, which are apps written to run on the Mobile Operating System.

(c) **Mobile Browser and Browser Engine** – the provision of a mobile browser and mobile browser engine, which comprises:

(i) the provision of a software application that enables users of Mobile Devices to access and search the internet and interact with web content; and

(ii) the provision of a mobile browser engine, which is the underlying technology which native apps on Mobile Devices use to transform web page source code into content with which users can engage.

1.16 The component digital activities of Google's Mobile Platform together facilitate interactions between users and providers of digital content and services on Mobile Devices in order to allow users to access, view and engage with such

content and services on their Mobile Devices. These individual digital activities together form an integrated package of complementary services and content. Accordingly, it is appropriate, for the purposes of arriving at an assessment of SMS under the Act, to consider them together, reflecting their interlinkages. The grouping of these activities as the Mobile Platform provides the framework necessary to reflect the real-world operation of these services and content, taking account of how they are offered and consumed.

1.17 Our definition of the Mobile Platform does not include Mobile Devices. However, we recognise in our analysis that the Mobile Platform and the device on which it is deployed are closely connected. Similarly, content accessed via the Mobile Platform such as apps, are not within the scope of the defined digital activity. We refer to Google's broader activities, including Mobile Devices, the Mobile Platform, and content accessed via the Mobile Platform as **Google's Mobile Ecosystem**.

1.18 The CMA is far from the only authority considering these issues. Several competition authorities globally have taken action in relation to Google's Mobile Platform in recent years (including the US Department of Justice (DoJ), European Commission, Japan Fair Trade Commission (JFTC) and Australian Competition and Consumer Commission (ACCC)). Although our SMS investigation is focused on Google's activities in the UK, Google's Mobile Platform operates globally, and we have sought to learn from international findings in conducting our own investigation.

Substantial and entrenched market power

1.19 We have found that Google has substantial and entrenched market power in respect of its Mobile Platform – the first condition of the SMS test.

1.20 Google's Mobile Platform operates in ways that interact and mutually reinforce one another; for Google, for device manufacturers, and for content providers and end-users. As Google itself has said, it makes sense for it to invest in Android, and supply it on an open-source basis to device manufacturers, because that gives it the opportunity to put apps in front of consumers, which may generate revenue, most often, although not exclusively, through advertising – notably Google Search, as the CMA's search SMS investigation

shows.[9,10] For content providers, Google's Mobile Platform provides the infrastructure through which to offer their services to large numbers of consumers, and consumers in turn get access to all the content that is made available to them.

1.21 As we look across these interconnected facets of Google's Mobile Platform, we can see that it has consistently succeeded on all fronts, and very profitably:

(a) Android is the only operating system licensed to OEMs, so is installed on a significant number of Mobile Devices.

(b) While there exists another Mobile Ecosystem in the shape of Apple, Google has held a large and stable group of end-users over a number of years, mutually reinforced by content providers wanting to be on Google's Mobile Platform in order to reach those consumers.

(c) Even where there is competition within the platform – browsers and app stores – Google has an overwhelmingly strong position.

(d) As the recently completed Google search SMS investigation demonstrates, Google's general search and search advertising business has been very successful (and highly profitable) for a long period, supported by success in mobile search via Android and Chrome.

1.22 In seeking to understand the reasons for this overall strong position, we have had to consider competitive forces at a somewhat disaggregated level, thinking about different groups of users and different digital activities. But when judging the existence or otherwise of substantial and entrenched market power, it only makes sense to carry out the assessment in the round; focusing unduly on one aspect would miss the bigger, interconnected picture. This reflects the commercial realities of what Google is trying to do in the market; the very same realities which also underlie the decision to 'group' the various digital activities into the Mobile Platform.

1.23 Key elements of our detailed consideration later in this report include:

[9] 'Android has created more choice not less' – Sundar Pichai Google blog, 18 July 2018. 'This investment makes sense for us because we can offer phone makers the option of pre-loading a suite of popular Google apps (such as Search, Chrome, Play, Maps and Gmail), some of which generate revenue for us, and all of which help ensure the phone 'just works', right out of the box.'
[10] CMA's Decision to designate Google's as having SMS in general search services, October 2025.

(a) Share of end-users – substantial for Google, and higher at the cheaper end of the smartphone market.

(b) Low switching rates and relatively little consideration of switching between two differentiated Mobile Ecosystems, resulting in a stable user base.

(c) Content providers want access to that user base, and mostly have to go via Google's Mobile Platform to do so.

(d) Greater competitive constraint from Apple for premium users relative to non-premium users, but premium users represent only a small part of Google's customer base, and most users, including premium users, do not switch between Mobile Ecosystems.

(e) Dampened competition between Google and Apple due to their revenue-sharing agreement.

(f) Significant barriers facing any potential alternative mobile platform, such as network effects.

(g) High profits and a high return on capital globally from Google's Mobile Platform.

1.24 Overall, our assessment shows that Google faces limited current competitive constraints in the provision of its Mobile Platform. Google faces a very limited constraint with respect to content providers and no effective competition in licensing to OEMs. Consequently, any constraint in relation to end users would need to be particularly pronounced to ensure that Google does not have substantial market power. However, our assessment shows that Apple only exerts a limited competitive constraint in relation to end users.

1.25 Like any digital market, there are technological developments, particularly involving AI. However, we have not seen evidence that there are expected or foreseeable developments that are likely (whether individually or in combination) to be sufficient in scope, timeliness and impact to eliminate Google's substantial market power in the provision of its Mobile Platform over the next five years.

1.26 Accordingly, our conclusion is that Google's substantial market power in the provision of its Mobile Platform is entrenched.

Position of strategic significance

1.27 We have also found that Google has a position of strategic significance in the provision of its Mobile Platform – the second SMS condition.

1.28 Google's Mobile Platform is used by a very large number of UK users (eg to access, view and engage with digital content and services on their Android Mobile Devices) and businesses in the UK (eg as a means of reaching those users).

1.29 The services provided by Google as part of its Mobile Platform are important to a wide range and large number of other businesses in the UK to provide digital content and services to users of Mobile Devices with Google's Mobile Platform.

Our SMS decision

1.30 As set out in the SMS Decision Notice published on our case page,[11] we are designating Google as having SMS in the provision of its Mobile Platform with effect from the date of this Decision. The designation will last for five years, subject to the provisions of the Act which allow the CMA to revoke or extend the designation.

[11] SMS investigation into Google's mobile platform - GOV.UK

2. CONTEXT TO THIS INVESTIGATION

This chapter sets out the context to our investigation. It provides information on the origins of the digital markets competition regime and the concepts which form part of this new legal framework. It also provides an overview of Google's Mobile Platform.

The UK's digital markets competition regime

Overview

2.1 The Digital Markets, Competition and Consumers Act 2024 (the **Act**) establishes the UK's digital markets competition regime. The accompanying notes explain:[12]

> 'Businesses operating in digital markets make a very significant contribution to the UK economy. However, it is the Government's view that the unprecedented market power, in relation to certain digital activities, of a small number of businesses, is holding back innovation and growth. Existing competition and consumer laws are not designed to address the unique barriers to competition in digital markets. In response, this Act establishes a new regime that is designed to boost competition in digital markets.'

2.2 The Act is the culmination of many years of policy development and consultation.

2.3 In September 2018 the government established a 'digital competition expert panel', led by Professor Jason Furman, to consider the opportunities and challenges the digital economy posed for competition policy. The panel's March 2019 report noted that the digital economy has benefited consumers by creating entirely new categories of products and services, and businesses by lowering start and scale-up costs. But it also noted that many digital markets are prone to 'tipping' in favour of a small number of large firms, which can lead to higher prices, reduced choice and quality for consumers and harm to innovation.[13]

[12] Explanatory notes to the Act, paragraph 3.
[13] The 2019 'Furman' Report, pages 3-4.

2.4 The panel recommended that 'competition in digital markets should be sustained and promoted through a new approach, alongside the core conventional competition tools of merger control and antitrust enforcement'.[14] It considered that if implemented effectively, this approach would be 'more flexible, predictable and timely' than existing legal regimes.[15]

2.5 In March 2020 a 'digital markets taskforce' was established to provide advice to the government on the design and implementation of a new regime. The taskforce was led by the CMA, working closely with the Office of Communications (**Ofcom**) and the Information Commissioner's Office (**ICO**). The taskforce reported in December 2020, again noting the benefits created by digital markets but also that 'The accumulation and strengthening of market power by a small number of digital firms has the potential to cause significant harm to consumers and business that rely on them, to innovative competitors and to the economy and society more widely'. To address these concerns, the taskforce recommended the creation of a new regime applicable to 'the most powerful digital firms'.[16]

2.6 Having consulted in 2021,[17] in May 2022 the government committed to bringing forward legislation, noting its intent to build 'the bespoke regulatory toolkit required to address the unique issues arising from digital markets' and 'a more flexible and targeted regime that can better support innovation'.[18]

2.7 The Act came into force in January 2025. In line with the policy development that led to its creation, it establishes a framework that is flexible and forward-looking, reflecting the dynamic nature of the digital economy and providing for intervention in a bespoke and targeted way. It gives the CMA the responsibility of assessing whether firms should be subject to the regime, and if so, whether and how rules should apply to their business. In recognition of the need for clarity on how the regime applies, the CMA published statutory guidance

[14] The 2019 'Furman' Report, page 8.
[15] The 2019 'Furman' Report, page 2.
[16] 2020 Advice of the Digital Markets Taskforce, pages 2 and 4.
[17] A new pro-competition regime for digital markets (CP 489). See also the government's July 2021 impact assessment for the consultation, which notes: 'Government intervention is necessary as the concentration of market power and weak contestability in these markets is unlikely to be rebalanced through market forces or existing regulatory tools.'
[18] The government's 2022 response to consultation on a new pro-competition regime for digital markets, pages 5 and 7.

(subject to Secretary of State approval) on how it will approach its functions under the Act.[19]

Strategic market status: the gateway to the regime

2.8 The Act empowers the CMA to designate a firm as having strategic market status (**SMS**). SMS designation is the gateway to the digital markets competition regime – it will only apply to a firm designated as having SMS in relation to a particular 'digital activity'.[20] Only the largest firms can be designated: those with turnover greater than £1 billion in the UK or £25 billion globally, thresholds introduced 'to make clear that smaller firms will not be in scope'.[21]

2.9 To designate a firm which exceeds the turnover thresholds with SMS, the CMA must establish that the firm has (i) 'substantial and entrenched market power' and (ii) 'a position of strategic significance' in respect of a 'digital activity' linked to the UK.

Digital activities

2.10 Traditional competition regimes assess market power through the lens of market definition. This involves drawing boundaries by measuring how substitutable products and services are for one another, often using hypothetical models to predict how customers would respond to price increases. This can be a useful tool in many contexts. But in others, it may not reflect the reality of competition. This was recognised during the development of the digital markets competition regime:[22]

> 'The market power assessment should not require a formal market definition exercise, which results in a binary judgement of whether firms fall inside or outside of the market. Such a rigid approach would fail to recognise the nuanced and interconnected nature of digital products and services and underemphasise the importance of dynamic competition.'

[19] CMA194. The government's 2022 response to consultation on a new pro-competition regime for digital markets, paragraph 46.
[20] Explanatory notes to the Act, paragraph 94; 2020 Advice of the Digital Markets Taskforce, paragraph 4.7.
[21] The government's 2022 response to consultation on a new pro-competition regime for digital markets, page 17.
[22] 2020 Advice of the Digital Markets Taskforce, paragraph 4.14. See also the government's July 2021 consultation document, A new pro-competition regime for digital markets (CP 489), paragraph 54.

2.11 The digital markets competition regime therefore does not use the concept of a relevant market. The explanatory notes to the Act confirm that the assessment of substantial and entrenched market power 'does not require the CMA to undertake a formal market definition exercise'.[23]

2.12 Instead, the SMS conditions are assessed by reference to a 'digital activity' – a bespoke legal concept for this new legal regime.

2.13 The advice of the digital markets taskforce was that:[24]

> 'In order to retain a targeted, practical and proportionate approach, we do not consider that the entire SMS firm should be assessed when considering SMS designation. Rather we propose the assessment should be applied with respect to a specific activity … A focus on activities encourages a focus on how a specific firm operates and how the products and services offered by the firm interact. This is appropriate given that the SMS regime is firm-specific.'

2.14 In response to its consultation on the regime, the government noted that 'This approach was generally preferred to linking the assessment to 'markets', as would normally be the case in a CMA investigation'; and that 'Stakeholders agreed that the definition of digital activities needs to allow for flexibility so that the regime can respond to new technological developments and business models, whilst providing clarity for business.'[25]

2.15 Rather than setting out definitions of products or services that the CMA must apply, the Act therefore requires the CMA to describe a digital activity carried out by the relevant firm.

2.16 The Act allows the CMA to treat two or more digital activities carried out by a firm as a single digital activity – to 'group' what would otherwise qualify as separate activities – where they share a common purpose or can be carried out together to fulfil a specific purpose.

2.17 This too allows the regime to reflect the reality of specific firms' business models, and in particular the interconnected nature of products and services in

[23] Explanatory notes to the Act, paragraph 109.
[24] 2020 Advice of the Digital Markets Taskforce, paragraph 4.15. See also Appendix B, paragraphs 13-14 and 18; A new pro-competition regime for digital markets (CP 489), paragraph 51; and the UK's 2022 note to the OECD on the evolving concept of market power in the digital economy, paragraphs 67-69.
[25] The government's 2022 response to consultation on a new pro-competition regime for digital markets, page 14.

the ‘ecosystems’ or ‘platforms’ that feature in the digital economy. The recommendation of the digital markets taskforce was that the CMA should be able to ‘group products or services supplied by a firm into a single activity when these products or services (i) can reasonably be described as having a similar function or (ii) can reasonably be described as fulfilling, in combination, a specific function’, giving among other examples the services offered to buyers and sellers by an online marketplace or app store.[26] The explanatory notes to the Act give as examples of activities that might appropriately be ‘grouped’: a social media provider offering a number of services under different brands with the common function of allowing advertisers and publishers to interact and communicate with each other; and products and services that are part of the same supply chain, such as services selling advertisements and the provision of an advertising platform.[27]

2.18 A digital activity must be ‘linked to the UK’, consistent with the government’s decision to require the CMA ‘to establish a UK nexus, ensuring a focus on competition in the UK’.[28] Such a link exists where the digital activity has a significant number of UK users; the firm carries on business in the UK in relation to the digital activity; or the way in which the firm carries on the digital activity is likely to have an immediate, substantial and foreseeable effect on trade in the UK.

The SMS conditions

2.19 In addition to digital activities, the Act introduces another bespoke concept for the digital markets competition regime: ‘substantial and entrenched market power’.[29] This legal concept is tailored to the nature of the regime: to assess whether a firm has substantial and entrenched market power in a digital activity, the Act requires the CMA to carry out a forward-looking assessment of a period of at least five years, taking into account expected and foreseeable developments that may affect the firm’s conduct in carrying out the activity.

[26] The 2020 advice of the digital markets taskforce, Appendix B, paragraphs 16-17.
[27] Explanatory notes to the Act, paragraph 103. Further examples of when it may be appropriate to ‘group’ digital activities can be found in CMA194, paragraphs 2.14-2.15.
[28] The government’s 2022 response to consultation on a new pro-competition regime for digital markets, paragraph 44.
[29] Although the Furman report proposed that ‘The ‘significant market power’ test in telecoms regulation provides a good starting point’ for the assessment of market power in the digital economy (the 2019 ‘Furman’ Report, paragraph 2.117), Parliament chose not to import concepts from other legal regimes. Cf, for example, the Communications Act 2003, which provides that ‘significant market power’ is to be construed in the same way as the concept of dominance under the Competition Act 1998: section 78.

2.20 The explanatory notes to the Act state that 'The underlying policy intent is that the CMA should be satisfied that the undertaking's power and influence in the digital activity is neither small nor transient, based on their consideration of competitive conditions. However, the CMA is not required to demonstrate that the undertaking's market power will definitely endure for a minimum period of five years. The intent is also that the CMA should not be prevented from considering past and present market conditions as part of this forward-looking assessment'.[30]

2.21 To establish that a firm has a position of strategic significance in respect of the digital activity, the CMA must show that the firm meets at least one of the criteria set out in the Act:

(a) a position of significant size or scale in respect of the digital activity;

(b) a significant number of other firms use its digital activity in carrying on their business;

(c) the firm's position in respect of the digital activity would allow it to extend its market power to a range of other activities; and

(d) the firm's position in respect of the digital activity allows it to determine or substantially influence the ways in which other firms conduct themselves.

2.22 To ensure clarity as to what qualifies as a position of strategic significance, this is an exhaustive list of factors.[31] It is complementary to the substantial and entrenched market power condition, since the government recognised that 'Digital firms may have significant size or scale or have many business and consumer users, but that does not in itself indicate a competition problem'.[32]

2.23 Only where the CMA can demonstrate that all the conditions in the Act are met is it able to designate a firm as having SMS in respect of the relevant digital activity.

[30] Explanatory notes to the Act, paragraph 109.
[31] The government's 2022 response to consultation on a new pro-competition regime for digital markets, pages 16-17.
[32] Government consultation document, A new pro-competition regime for digital markets (CP 489), paragraph 62.

The process

2.24 Before designating a firm with SMS, the CMA must carry out an 'SMS investigation' to determine whether the legal tests are met.

2.25 This is a process of ongoing engagement with the relevant firm, stakeholders and the wider public, as part of the CMA's 'participative approach' to operating the regime.[33]

2.26 The CMA publishes an 'invitation to comment' (**ITC**) encouraging those interested to provide their views. We gather evidence through formal powers, through meetings and calls, and potentially through research commissioned from third parties; and provide the relevant firm with multiple opportunities to address decision makers directly. If we propose to designate that firm, we carry out a public consultation on our proposal.

2.27 The CMA must reach a decision within nine months. If, having considered all the evidence and submissions received, we decide to designate the firm, we must publish our decision and the reasons for it.

2.28 A designation lasts, in principle, for five years. But it can be reviewed at any point and can be revoked, for example if changes in competitive conditions mean the firm no longer meets the SMS tests.

2.29 In designing the digital markets competition regime, the government recognised that 'The size and presence of 'big' digital firms is not inherently bad'.[34] There are no rules that apply automatically to designated firms, and the Act does not compel the CMA to impose any particular rules.

2.30 Instead, the Act allows the CMA to introduce targeted measures in relation to the digital activity, where such measures are proportionate for the purposes of specific statutory objectives – that users or potential users of the relevant digital activity:

(a) Are treated fairly and subject to reasonable terms (fair dealing);

(b) Are able to choose freely and easily between firms providing services or digital content (open choices); or

[33] See Overview of the CMA's provisional approach to implement the new Digital Markets competition regime.
[34] The government's 2022 response to consultation on a new pro-competition regime for digital markets, page 7.

(c) Have the information they need to understand the terms on which the activity is provided to them, and make properly informed decisions about their interaction with the firm (trust and transparency).

2.31 Before introducing such measures, the CMA must carry out further public consultation.

Background to our investigation

2.32 Our investigation into whether to designate Google as having SMS in respect of its mobile operating system, native app distribution services and its mobile browser and browser engine, used on smartphones and tablets (together **Mobile Devices**) began on 23 January 2025[35] and we published our proposed Decision on 23 July 2025.[36]

2.33 To inform our investigation we have gathered a wide range of evidence, including from Google, stakeholders across the digital economy, consumer research and consulted with experts and other regulators.[37]

Introduction to Google and its Mobile Ecosystem

2.34 Google is a technology company that provides many important services in the digital world, including search, web browsers, email, video-sharing and mapping.

2.35 Mobile devices are a key method by which users access content and services online and so a large part of Google's focus in its Mobile Ecosystem is on controlling the distribution of its own content and services to mobile users.

2.36 The core of Google's Mobile Platform is its Android operating system. This is deployed on Google's own Pixel Mobile Devices,[38] but Google also licenses Android to OEMs like Samsung.[39] The operating system determines and

[35] CMA's investigation notice to Google in relation to the launch of initial strategic market status investigation dated 23 January 2025. On the same day, we also launched an investigation into whether to designate Apple with SMS in respect of its operating system, native app distribution services, and mobile browser and browser engine on Mobile Devices.
[36] CMA's proposed decision to designate Google as having strategic market status dated 23 July 2025 (**Proposed Decision**).
[37] More information on our approach to evidence gathering is set out in Appendix D.
[38] We discuss the rationale for Google's supply of its own Pixel devices in Chapter 6.
[39] Google's Android operating system is available on an open-source basis. Google licenses the Android brand to OEMs who ensure that their devices comply with the baseline compatibility requirements set out in the Compatibility Definition Document (CDD). Developers may also to modify (or 'fork') Android to create their own version. An Android

controls a range of features that are important to users of Mobile Devices, ranging from the appearance of the user interface through to the speed, technical performance and security of the mobile device. It also determines what kinds of software can run on the mobile device, including all applications, such as native apps and mobile browsers.

2.37 Apps are software that provide additional functionalities to the Mobile Devices and mobile operating system on which they are installed. The OEM determines which apps are pre-installed and Google enters into agreements with OEMs to pre-install many of its services, like Play, Chrome, Search, Maps and YouTube on the Mobile Devices they manufacture. As well as covering pre-installation, these agreements also cover promotion such as where Google services are placed (for example whether on the home screen) and whether they are set as the default. More information on these agreements is set out in Appendix C.

2.38 Users can also download third-party apps from a range of sources using Android Mobile Devices,[40] the most used of which is Google's Play Store which is generally pre-installed.[41] The Play Store accounted for [✂] [90-100]% of native app downloads on Android Mobile Devices in the UK in 2024.[42] The Play Store enables consumers to search, select, purchase, install, and review millions of apps and enables many hundreds of thousands of businesses, large and small to describe, distribute and promote their content and services via apps to millions of users. Google sets certain standards and requirements for apps wishing to be distributed via the Play Store.[43] It also charges commission for the sale of digital content and services via apps downloaded through the Play Store.

2.39 An important type of app is a mobile browser, which enables users to interact with content on the web. Android Mobile Devices often come with Google's Chrome browser pre-installed and this is the most used browser on Android (80% share of supply).

fork is a version of Android falling outside of Google's compatibility requirements. For example, Amazon's Fire OS is an Android fork. The majority of active smartphones in the UK that use Android use the version of Android that meets Google's baseline compatibility requirements and, in this decision, we refer to Android as shorthand for this version.
[40] Users can also download apps from other app stores, such as the Samsung Galaxy Store, or sideload apps (for example download and install an app direct from a website).
[41] Indeed, under Google's agreements with device manufacturers, manufacturers can license Google first party apps if they agree to pre-install and place the Play Store on the device home screen.
[42] Source: CMA analysis of data from market participants.
[43] Developer Policy Center.

2.40 Google also operates its own mobile browser engine Blink. The browser engine is responsible for processing HTML, CSS and JavaScript code and rendering websites into the visual format that users see on their Mobile Devices. Browser engines play an important role in the user experience of mobile browsing, as they can impact speed, stability and levels of compatibility with different web content and standards. Most browsers used on Android are Chromium-based, meaning that they use browser engines based on Blink.[44]

2.41 Mobile browsers are an important access point for search engines,[45] and are therefore important to Google's search business. AI features can also be incorporated into mobile browsers, providing a distribution channel for AI products including Google's Gemini.

2.42 Figure 2.1 below shows the key elements of Google's Mobile Ecosystem.

Figure 2.1: Google's Mobile Ecosystem

[44] MEMS final report, paragraph 2.27. Chromium is the open-source Chrome browser code that includes the Blink engine and parts of the Chrome browser except for some of Google's proprietary features.
[45] Strategic market status investigation into Google's general search services, Proposed Decision, paragraph 5.142.

2.43 Google generates the large majority of its revenue through selling digital advertising, primarily search advertising.[46] Its position in digital advertising is supported by its agreements with OEMs to pre-install and prominently place Google services like Search on Mobile Devices. Google's Mobile Ecosystem therefore supports Google's wider digital advertising business by generating traffic for its search engine and other services that generate advertising revenue (including mobile apps such as YouTube).

2.44 In the financial year ending December 2024, Google's total global revenues were $350 billion,[47] a significant proportion of which (at least $[✂] billion), related to its Mobile Ecosystem.[48,49] Mobile search accounted for the majority ([✂]) of mobile revenues globally, and the Play Store (including Play Advertising) accounted for a further [✂] [5-15]%.[50] The remainder related to other mobile advertising revenues (including in-app advertising), other mobile services,[51] and Pixel Mobile Devices. Google does not directly monetise Chrome or Android but indirectly monetises them through the Play Store and mobile advertising.[52]

[46] Alphabet, 'Form 10-K for Alphabet INC filed 02/05/2025', accessed by the CMA on 16 July 2025, page 64.
[47] Alphabet, 'Form 10-K for Alphabet INC filed 02/05/2025', accessed by the CMA on 16 July 2025, page 53.
[48] Mobile Ecosystem revenues accounted for the majority of the global revenues for the Google Services segment, which generated revenues of $304.9 billion in the financial year ending December 2024.
[49] Google response to the section 69 notice [✂]. CMA estimate of revenue related to Google's Mobile Ecosystem includes the following revenue categories: mobile Search, Play Store (including Play Store Advertising), other mobile advertising, Pixel devices, [✂].
[50] Google's response to section 69 notice [✂]; [✂].
[51] Including [✂].
[52] More detailed analysis is included in Appendix B.

3. UNDERTAKING AND TURNOVER

3.1 This chapter considers the Google undertaking which is the subject of our decision; and whether the 'turnover condition' is met in relation to the Google undertaking.

The Google undertaking

The Google undertaking that the CMA is designating as having SMS in respect of its Mobile Platform includes Alphabet Inc., Google LLC, Google Ireland Limited, and Google UK Limited.

3.2 The Act provides that the CMA may designate an 'undertaking' as having SMS in respect of a digital activity carried out by the undertaking (where the conditions in the Act are met).[53]

3.3 'Undertaking' has the same meaning as it has for the purposes of Part 1 of the Competition Act 1998.[54]

3.4 The concept of 'undertaking' covers any entity engaged in an economic activity, regardless of its legal status and the way in which it is financed. It is 'an economic unit even if in law that economic unit consists of several persons, natural or legal'.[55] An undertaking does not therefore correspond to the commonly understood notions of a legal entity or corporate group, for example under English commercial or tax law.[56]

3.5 Multiple persons (such as a parent company and its subsidiaries) will usually be treated as a single undertaking if they operate as a single economic entity. This will be the case where one exercises 'decisive influence' over another – for example, a parent company which decides the commercial policy of its subsidiaries.[57]

[53] Section 2(1) of the Act.
[54] Section 118(1) of the Act.
[55] C-97/08 *Akzo v Commission,* paragraphs 54–55.
[56] *Sepia Logistics Limited v Office of Fair Trading* [2007] Competition Appeal Tribunal (**CAT**) 13, paragraph 70.
[57] CMA194, footnote 2. Where a parent company holds all or virtually all of a subsidiary's share capital or all of its voting rights, there is a rebuttable presumption that it exercises decisive influence over, and therefore forms a single undertaking with, that subsidiary. See, for example, C-97/08 *Akzo v Commission*, paragraph 60; C-595/18 P *Goldman Sachs v Commission*, paragraphs 35–36.

3.6 The Act requires us to describe the designated undertaking.[58] Our Guidance explains that where an undertaking comprises multiple companies, we will usually seek to identify the parent company and the main subsidiaries responsible for carrying on the digital activity, and will provide a non-exhaustive list of the legal entities which form part of the undertaking to which our decision applies.[59]

3.7 The Google undertaking we are designating as having SMS in respect of its Mobile Platform includes Alphabet Inc., Google LLC, Google Ireland Limited, and Google UK Limited – respectively the parent company and the main subsidiaries responsible for carrying on the Mobile Platform digital activity (and its component parts) that is the subject of this decision. These entities form part of a single economic unit engaged in an economic activity and therefore constitute an undertaking within the meaning of the Act:

(a) Google LLC[60] contracts with third parties regarding the licensing of the Android operating system.[61] It is also involved in providing Google services, such as first party apps, on compatible Android Mobile Devices in the UK. In addition, it oversees the Play Store in the UK, including key decision makers for the Play Store. It also provides services in respect of the Chrome mobile browser and the Blink browser engine in the UK, and contracts with third parties in relation to the distribution of Google's apps and services.[62]

(b) Google Ireland Limited also contracts with third parties in relation to the distribution of Google's apps and services.[63]

(c) Google UK Limited[64] is the employer of Google's personnel in the UK,[65] and provides intra-group services to other Google entities.[66]

[58] Section 15(3)(a) of the Act.
[59] CMA194, paragraph 2.104, footnote 78, paragraph 2.90.
[60] A private limited company incorporated in Delaware, United States of America under registered number 3582691, with its registered office at 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States of America.
[61] Google's response to section 69 notice [✂].
[62] Google's response to section 69 notice [✂].
[63] Google's response to section 69 notice [✂].
[64] A private limited company incorporated in the United Kingdom under registered number 03977902, with its registered office at 1 St. Giles High Street, London, WC2H 8AG, United Kingdom.
[65] Google's response to the section 69 notice in relation to SMS investigation into Google's general search and search advertising services [✂].
[66] Google UK Limited, Directors' Report and Financial Statements, Financial Year ended 31 December 2023, page 19. Google described Google UK Limited in similar terms in Google's response to the section 69 notice in relation to SMS investigation into Google's general search and search advertising services [✂].

3.8 Each of Google LLC, Google Ireland Limited and Google UK Limited is ultimately wholly owned by Alphabet Inc.[67]

The turnover condition

This section sets out that the global turnover threshold and the UK turnover threshold (either of which would suffice) are both exceeded – and therefore the turnover condition is met in relation to the Google undertaking.

Legislation and guidance

3.9 The CMA may not designate an undertaking as having SMS in respect of a digital activity unless the 'turnover condition' is met in relation to the undertaking.[68]

3.10 The turnover condition is met in relation to an undertaking if the CMA estimates that:

(a) the total value of the global turnover of an undertaking, or where the undertaking is part of a group,[69] the global turnover of that group in the relevant period exceeds £25 billion (the **global turnover threshold**); or

(b) the total value of the UK turnover[70] of an undertaking, or where the undertaking is part of a group, the UK turnover of that group in the relevant period exceeds £1 billion (the **UK turnover threshold**).[71]

[67] A public listed company incorporated in Delaware, United States of America under registered number 5786925, with its registered office at 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States of America. Google's response to the section 69 notice in relation to SMS investigation into Google's general search and search advertising services [✂]. The corporate structure charts Google submitted indicate that each of Google LLC, Google Ireland Limited and Google UK Limited is wholly owned by XXVI Holdings Inc., which is in turn 'Controlled by Alphabet Inc.' Although the structure charts do not indicate the proportion of voting rights or shares held by Alphabet Inc., a US regulatory filing from January 2025 states that Alphabet Inc. holds '100% equity interest and more than 99% voting interest in XXVI Holdings [Inc]' (Streamlined Submarine Cable Landing License Applications, 10 January 2025, Federal Communications Commission, bottom of page 2, SCL00509S.pdf). The presumption that Alphabet Inc. exercises decisive influence over XXVI Holdings Inc. (and therefore indirectly over each of Google LLC, Google Ireland Limited and Google UK Limited) therefore applies. Google has not disputed this.
[68] Sections 2(3) and 7(1) of the Act.
[69] An undertaking is part of a group if one or more bodies corporate which are comprised in the undertaking are members of the same group as one or more other bodies corporate. Two bodies corporate are members of the same group if (a) one is the subsidiary of the other, or (b) both are subsidiaries of the same body corporate (section 117 of the Act).
[70] Turnover relating to UK users or UK customers: section 8(3) of the Act. UK user' and 'UK customer' are defined at section 118(1) of the Act as meaning any user or, as the case may be, customer who it is reasonable to assume (a) in the case of an individual, is normally in the UK; and (b) in any other case, is established in the UK.
[71] In each case, turnover arising in connection with any activities is taken into account: section 8(2) and (3) of the Act.

3.11 The ‘relevant period’, in each case, means:

(a) the most recent period of 12 months in respect of which the CMA considers that it is able to make an estimate of the total value of the relevant turnover of the undertaking or group; or

(b) if the CMA estimates that the relevant turnover of the undertaking or group in the period of 12 months prior to the period in (a) above was higher, that earlier period of 12 months.[72, 73]

3.12 Our Guidance explains that the CMA’s starting point for assessing relevant turnover will usually be the undertaking and/or group’s latest published accounts.[74] Further, the CMA expects that the most recent period of 12 months in respect of which it is able to make an estimate of the total value of the relevant turnover of the undertaking or group will in most instances be the 12-month period covered by those accounts.[75]

Our assessment

3.13 The global turnover threshold and the UK turnover threshold (either of which would suffice) are both exceeded – and therefore the turnover condition is met in relation to the Google undertaking.[76]

(a) Alphabet Inc.’s most recent published accounts report revenues of $350 billion (£273.8 billion[77]) for the financial year ending 31 December 2024.[78]

(b) Alphabet Inc.’s published accounts also include a geographic breakdown of global revenues on a regional basis, based on the addresses of its customers. The UK is part of the Europe, Middle East and Africa (**EMEA**)

[72] Section 7(6) of the Act.
[73] Further details on the methodology for estimating turnover are set out in the Digital Markets, Competition and Consumers Act 2024 and Consumer Rights Act 2015 (Turnover and Control) Regulations 2024 (the **Turnover Regulations**), Schedule 1.
[74] Where the CMA is assessing turnover for the purposes of the UK turnover threshold, this will include considering any geographic breakdown contained in the published accounts. See CMA194, paragraph 2.37.
[75] CMA194, paragraph 2.39.
[76] Pursuant to section 7(2) of the Act, where the undertaking is part of a group, the turnover of the whole group should be considered. For the avoidance of doubt, we have therefore considered the turnover of the Google group as a whole (with Alphabet Inc. as the ultimate parent company) rather than just the turnover attributable to the main subsidiaries responsible for carrying on the relevant digital activity.
[77] Converted from USD to GBP at an average annual exchange rate for 2024 of 1.2783 (Source: Bank of England).
[78] Alphabet, ‘Form 10-K for Alphabet INC filed 02/05/2025’, accessed by the CMA on 16 July 2025. Given the scale by which Google’s reported turnover exceeds the global turnover threshold, we have not conducted a more detailed assessment of its global turnover based on the methodology specified in the Turnover Regulations.

revenue reporting region, which reported revenues of $102.1 billion (£79.9 billion[79]) for the financial year ending 31 December 2024.[80]

(c) While Alphabet Inc.'s published accounts do not include UK-specific revenue figures, Google estimates its UK revenues, based on the addresses of its customers, to be approximately $[✂] [10–20] billion for the financial year ending 31 December 2024.[81] Google has also confirmed that its UK turnover would exceed the UK turnover threshold if assessed under the Turnover Regulations.[82, 83]

[79] Converted from USD to GBP at an average exchange rate for 2024 of 1.2783 (Source: Bank of England).
[80] Alphabet, 'Form 10-K for Alphabet INC filed 02/05/2025', accessed by the CMA on 16 July 2025.
[81] Google's response to the section 69 notice in relation to SMS investigation into Google's general search and search advertising services [✂].
[82] Google's response to the section 69 notice in relation to SMS investigation into Google's general search and search advertising services [✂].
[83] We recognise there may be differences between the way a company accounts for UK turnover in its financial statements and the UK turnover threshold methodology set out in the Turnover Regulations. However, as Google has confirmed that its UK turnover would exceed the UK turnover threshold if assessed under the Turnover Regulations, we have not conducted a full assessment of turnover relating to UK users or UK customers.

4. DIGITAL ACTIVITY

Introduction

This chapter sets out our description of the digital activities which are included in our SMS designation. These are: the Mobile Operating System; Native App Distribution; and the Mobile Browser and Browser Engine.

It also sets out that we treat those activities as a single digital activity reflecting the reality of how they are offered and consumed: the Mobile Platform. The purpose of the Mobile Platform is to facilitate interactions between users and providers of digital content and services on Mobile Devices in order to enable users to access, view and engage with such content and services on their Mobile Devices.

We also conclude that Google's provision of its Mobile Platform is linked to the UK.

Legal framework and Guidance

4.1 The CMA may designate an undertaking as having SMS in respect of 'a digital activity carried out by the undertaking' where the conditions in the Act are met.[84]

4.2 For these purposes, 'digital activities' are:[85]

(a) the provision of a service by means of the internet, whether for consideration or otherwise;

(b) the provision of one or more pieces of digital content,[86] whether for consideration or otherwise; and

(c) any other activity carried out for the purposes of an activity within (a) or (b) above.

4.3 The Act provides that the CMA may treat (or 'group') two or more digital activities that are carried out by a single undertaking as a single digital activity where:[87]

[84] Section 2(1) of the Act.
[85] Section 3(1) of the Act.
[86] 'Digital content' means data which is produced and supplied in digital form, section 330 of the Act. This includes software, music, computer games and apps. CMA194, paragraph 2.9.
[87] Section 3(3) of the Act.

(a) the activities have substantially the same or similar purposes; or

(b) the activities can be carried out in combination with each other to fulfil a specific purpose.

4.4 The Act requires us to describe the digital activity with respect to which the SMS designation has effect.[88] The Act refers to this as the 'relevant digital activity'.[89]

4.5 Our Guidance states that we will indicate which of the existing products offered by the firm we consider to be within the scope of the relevant digital activity at the point of making a decision to designate the firm as having SMS.[90]

4.6 In identifying a digital activity and considering which of the firm's products it may comprise, we will typically look at how those products are offered and consumed. For example, we may consider how the firm structures itself and its business model, how businesses and consumers use and access its products, and any interlinkages among them. In practice, this will largely focus on factual information and will not require an assessment of the competitive constraints on the firm or a market definition exercise.[91]

Overview of Google's digital activities

4.7 In the Proposed Decision, we set out:

(a) the description of three relevant digital activities – Mobile Operating System, Native App Distribution and Mobile Browser and Browser Engine – and indicated the main products likely to be included within each of these digital activities, based on Google's current business model. The description of those three activities applied to 'Mobile Devices', which was defined to include both smartphones and tablets;[92]

[88] Section 15(3)(b) of the Act.
[89] Section 118(1) of the Act.
[90] CMA194, paragraph 2.107.
[91] CMA194, paragraph 2.10.
[92] Proposed Decision, paragraphs 4.45–4.46.
We described the following three digital activities:
a) Mobile Operating System, described as the provision of 'a mobile operating system or equivalent, which acts as an intermediary between hardware and software on the mobile device, enabling software applications (referred to as applications or apps) and services to run on the device';
b) Native App Distribution, described as the provision of 'a service which enables the installation, distribution and operation of native apps on Mobile Devices, which are apps written to run on the Mobile Operating System'; and
c) Mobile Browser and Browser Engine, described as the provision of 'a mobile browser and mobile browser engine, which comprises:

(b) our reasons why the relevant digital activities were treated as a single digital activity (ie 'grouped' together) as the 'Mobile Platform' digital activity;[93] and

(c) our reasons why Google's provision of its Mobile Platform is linked to the UK.[94]

4.8 In the following sections, in light of the consultation responses received, we set out our conclusions in relation to:

(a) our descriptions of the relevant digital activities – Mobile Operating System, Native App Distribution and Mobile Browser and Browser Engine – and the scope of those activities;

(b) grouping the described digital activities as a single digital activity; and

(c) whether the relevant digital activity is linked to the UK.

4.9 In considering how the relevant digital activities are offered and consumed, in the assessment below we take account of the fact that each of the individual digital activities is provided to several user groups. For example, in relation to Google's Mobile Operating System, it is supplied to OEMs and licensed for use on their Mobile Devices; it is provided to end-users on these OEM Mobile Devices as well as Google's own Pixel devices; and developers may consume Google's Mobile Operating System in the sense that they develop content and services that are compatible with it. In each case, the activity carried out by Google remains the same no matter which customer group it is provided to and comprises either the provision of digital content or the provision of a service by means of the internet.

Mobile Operating System

This section sets out our description of the Mobile Operating System digital activity, including our response to submissions and evidence received since our Proposed Decision. Our description is as follows:

i. the provision of a software application that enables users of Mobile Devices to access and search the internet and interact with web content; and
ii. the provision of a mobile browser engine, which is the underlying technology which native apps on Mobile Devices use to transform web page source code into content with which users can engage'.

[93] Proposed Decision, paragraph 4.60.
[94] Proposed Decision, paragraph 4.63.

Mobile Operating System: the provision of a mobile operating system or equivalent, which acts as an intermediary between hardware and software on the mobile device, enabling software applications (referred to as applications or apps) and services to run on the device.

4.10 We invited views from stakeholders on our proposed description and scope of Google's Mobile Operating System in both the ITC and the Proposed Decision. The description set out in the Proposed Decision was as set out above and we proposed to include certain features and functionalities related to middleware, voice assistants and connectivity to the extent that they play an intermediary role between hardware and software.

Submissions on our description and scope of Mobile Operating System

4.11 Google submitted that our delineation of the digital activities is overly broad, mischaracterises what an operating system is, and fails to provide a workable and principles-based approach that would support the application of substantive obligations.[95] Specifically, Google submitted that:

(a) The description of a Mobile Operating System should be amended as 'the provision of a mobile operating system or equivalent, which controls the basic functions of hardware and software on the mobile device, enabling software applications [...] and services to run on the device' (original emphasis).[96]

(b) In respect of whether middleware should form part of the Mobile Operating System digital activity, it is wrong to include middleware because it performs different functions and has different purposes than those of a mobile operating system.[97] In particular, the software code that comprises Google Play Services contains features that perform different functions. These features do not meet the definition of an operating system, serve the purpose of an operating system, or provide operating system level functionality.[98]

(c) In relation to whether 'connectivity functionalities' should form part of the Mobile Operating System digital activity, the Proposed Decision's

[95] Google's response to Proposed Decision, paragraph 113.
[96] Google's submission [✂]; Google's submission [✂].
[97] Google's submission [✂].
[98] Google's submission [✂].

formulation for 'connectivity functionalities' ignores that software involved in enabling connectivity cannot generally be described as an operating system and wrongly equates the provision of functionalities built on top of the hardware with the operating system. This contradicts the distinction that exists between operating system and non-operating system software.[99]

(d) In respect of whether virtual assistants should form part of the Mobile Operating System digital activity, there is no need for abstract references to 'supporting functionalities' because virtual assistants are end-user facing services and the Mobile Operating System definition already captures the application programming interfaces (**APIs**) that allow third-party virtual assistants to function and collect end-user data.[100]

4.12 In response to the Proposed Decision, some third parties submitted that we should further broaden or clarify the scope in respect of certain developer tools such as Android software development kit (**SDK**) (Epic Games),[101] connectivity functionalities (Mobile UK, [✂]),[102] voice assistants (Radiocentre),[103] digital wallets,[104] and identity/credential functions.[105]

Our assessment

4.13 The provision of a mobile operating system or equivalent constitutes 'the provision of one or more pieces of digital content' within the meaning of section 3(1)(b) of the Act.[106]

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[99] Google's submission [✂].

[100] Google's submission [✂].

[101] Epic Games' response to Proposed Decision, page 2. See discussion of developer tools in the Native App Distribution section below.

[102] Mobile UK's response to Proposed Decision, paragraph 8; [✂]'s response to Proposed Decision. Mobile UK is a trade association for UK mobile networks, such as EE, Virgin Media O2 and VodafoneThree.

[103] Radiocentre's response to Proposed Decision, paragraph 1. Radiocentre submitted that voice assistants should be included in their totality in the Mobile Operating System description because they act at a device level, act across multiple apps and are integrated within the operating system. See also paragraph 8, '[it] is clear the VA in its entirety, including the main VA interface, provides access to device data and other applications and functionalities – whether third- or first-party apps – and not just the developer framework'.

[104] [✂] Anonymous financial services firm's response to Proposed Decision, pages 2, 4. A financial services firm submitted that NFC access and digital wallets (including Google's wallet) must be included in the scope of the Mobile Operating System activity.

[105] [✂] Anonymous response to Proposed Decision, page 1. A digital identity and age assurance provider submitted that the identity, credential, and wallet functions must be included in the scope of Google's digital activities.

[106] This is because 'digital content' is defined in section 330 of the Act as 'data which is produced and supplied in digital form' and therefore encompasses the provision of an operating system as software on Mobile Devices. The Explanatory Notes to the Act clarify that, in relation to the definition of 'digital content', 'data' would include software

Whether the Mobile Operating System for smartphones and tablets forms part of a single digital activity

4.14 In the Proposed Decision, we provisionally considered in light of the submissions and evidence we had received that it would be appropriate to describe a single Mobile Operating System activity for the purposes of this investigation. In particular, we noted that Google does not distinguish between the development of Android for smartphones and tablets and develops and provides a single version of the Mobile Operating System for both types of devices.[107]

4.15 We have not received any further submissions on this point and conclude that it is appropriate to describe a single Mobile Operating System activity.

Description of the Mobile Operating System

Our functional approach

4.16 In describing the digital activities falling within this investigation we have adopted a functional approach consistent with our Guidance.

4.17 We therefore focus on the nature of the products and how they are offered and consumed, which includes assessing how the potential SMS firm structures itself and its business model, how businesses and consumers use and access its products and any interlinkages among them.[108] The focus on specific functions of particular products[109] seeks to ensure that all the relevant products which share the specific functions are captured within the scope of the digital activity.

4.18 Our description captures the provision of a mobile operating system or equivalent (encompassing all component parts of that system), which act as an intermediary between hardware and software on the mobile device, enabling apps and services to run on the device. In this context, by software we mean all software applications running on the device which provide the interface and capabilities that UK end-users experience; whereas hardware captures all the hardware components, which play a role in a mobile device's performance,

(paragraph 1888). The Guidance explains that digital content includes software, music, computer games and apps, CMA194, paragraph 2.9.
[107] Proposed Decision, paragraphs 4.21–4.22.
[108] CMA194, paragraphs 2.10–2.11.
[109] This includes features and functionalities.

durability and usability, including the processor, memory, display, battery, storage, microphone and camera.

The Android mobile operating system

4.19 In this section, we set out our understanding of how Google's Mobile Operating System is offered by Google and consumed by users. We focus on the functions the operating system fulfils in practice which frames our subsequent consideration of: (i) the appropriate description of the Mobile Operating System digital activity; and (ii) which elements should fall within the scope of that activity.

4.20 In relation to how Google offers its Mobile Operating System, we note the following:

(a) Some key functionalities of the Android mobile operating system are provided by Google to OEMs through the Android Open Source Project (**AOSP**). The full source code of the AOSP is available online, together with documentation describing the architecture and features implemented.[110]

(b) In addition, Google licenses a set of applications and other software as part of the European Mobile Application Distribution Agreement (**EMADA**). This includes a collection of services and APIs to make functionality available to first- and third-party apps on the device, called Google Play Services, which is part of the Google Mobile Services (**GMS**) package.

4.21 In our view, some of the software licensed under the EMADA can, and often does, fulfil an intermediary role between hardware and software on Mobile Devices, enabling apps and services to run on those devices. We explain that in relation to the relevant features and functionalities in more detail below.

4.22 Our position that the description of this digital activity should focus on the functions of the relevant products and services rather than how they are licensed is reinforced by the fact that there is not, in our judgement, a clear-cut boundary between the features and functionalities which are provided through the AOSP and those licensed in addition to it under the EMADA. In this regard, we are aware that Google changes the features and functionalities provided

[110] For AOSP source code, see Android Code Search; For Android Open Source Project documentation, see the Android Open Source Project website.

through AOSP or through Google Play Services over time. We note that until recently, Google provided an API as part of the AOSP to simplify the matching of machine learning runtimes to computational hardware available on different Android devices.[111] This functionality was phased out with the release of Android 15, and similar functionality for enabling the full use of acceleration hardware available on specific devices is currently being provided to app developers as part of LiteRT. While LiteRT is also available open-source to developers, Google recommends developers access LiteRT through Google Play Services,[112] which are licensed to OEMs covering the vast majority of Android mobile devices distributed in the UK according to our analysis set out in Appendix C.

4.23 Google does also recognise that it is important to take account of whether specific digital content fulfils the mediation function which allows apps to run on a device and that Google's Mobile Operating System contains any feature that serves the purpose of an operating system, regardless of how it is licensed.[113] We discuss the overlap between the concepts of 'acting as an intermediary' and 'fulfilling a mediation function' below, but for present purposes note that software which fulfils such a function may be provided through the AOSP or through Google Play Services.

4.24 In relation to how the operating system is consumed by OEMs, developers and end-users, we note that even though the AOSP is open-source and Google Play Services are subject to separate distribution arrangements, in practice, in the UK, Google tends to offer, and OEMs and end-users tend to consume, the Android operating system *together with* the functionality contained within the Google Play Services, according to our analysis set out in Appendix C.[114] From app developers' perspective, whilst Google points out that if app developers do

[111] We are referring here to the Neural Networks API (NNAPI). See documentation here: Neural Networks API | Android NDK | Android Developers.

[112] https://ai.google.dev/edge/litert/android; NNAPI Migration Guide | Android NDK | Android Developers. Android's developer website posted a 'NNAPI migration guide', which states that 'After NNAPI's release, the field of on-device machine learning (ODML) advanced rapidly. […] To meet those needs, Google developed TensorFlow Lite in Play Services, providing an updatable TensorFlow runtime for custom on-device ML models, and AICore, which provide GenAI foundation models like Gemini Nano directly on Android devices. To provide greater clarity on the recommended paths for production ML on Android, NNAPI (Neural Networks API) was phased out. To migrate from NNAPI, see the instructions for TensorFlow Lite in Google Play Services and optionally TFLite GPU delegate for hardware acceleration.'

[113] Note of call with Google [✂].

[114] We note that Samsung stated that it considered at least some parts of Google Play Services could be considered to fit the CMA's description of a mobile operating system, Samsung's submission [✂].

not want to integrate certain features and functionalities into their apps, they can implement their own or third-party functionality,[115] we understand that many app developers do take advantage of the Google Play Services to ensure effective operation of their apps on Mobile Devices.[116] We also note in any event that a similar point can be made in relation to some features and functionalities provided as part of AOSP, in that those too could be substituted by own or third-party functionality.

4.25 In our view, from users' perspective, it is therefore equally important to focus on the functions of the relevant products and services (including their features and functionalities) when deciding if these fall within the scope of the digital activity.

Google's comments on the description of the digital activity and our response

4.26 Google proposed that the description of this digital activity should mirror the definition of 'operating system' set out in the EU's Digital Markets Act (**DMA**), referring to the operating system controlling the basic functions of the device's hardware and software.[117] Google defined 'control' and 'basic functions' by reference to case law which assessed the concepts of an operating system, middleware and software applications within the particular context of those cases.[118] Google stated that the scope of the operating system was limited to 'features that are required for the operation of the device or control the management of critical device resources'.

4.27 We have considered the approach and judgments suggested by Google to assess whether it would be appropriate to make changes to the description of the operating system digital activity in light of those. We consider that our description of the digital activity is more appropriate for the purposes of this investigation for the following reasons:

(a) With regard to Google's suggestion that we refer to the concept of 'control' instead of acting as an 'intermediary', we consider that the latter is clearer and more likely to be future proof. As explained above, we consider that the operating system is the heart of a mobile device comprising layers of interlinking features and functionalities, which ensure that a mobile device

[115] Google's submission [✂].
[116] Mobile ecosystems market study final report, June 2022 (**MEMS**), paragraphs 3.166, 4.24.
[117] DMA, Article 2(10) ('operating system' means a system software that controls the basic functions of the hardware or software and enables software applications to run on it'). Google's submission [✂].
[118] Google's submission [✂]; Google's submission [✂].

can function, enabling apps and services to run on the device. In this context, we consider that the notion of acting as an intermediary is appropriate. We have also carefully taken account of the fact that we are setting the description of the Mobile Operating System for a period of five years and that there could therefore be a risk that the amendment suggested by Google could inadvertently exclude products, features and functionalities which in future may not have direct control over the functions of hardware and software, but nevertheless still act as an intermediary between them. For that reason, it is important for our description to capture products, features and functionalities that act as an intermediary role because this is what enables software applications and services to run on a device.

(b) In relation to Google's suggested reference to 'basic functions of hardware and software', Google's point appears to be concerned with ensuring that features that run 'on top' of basic functions are not part of the operating system.[119] It is not easy to describe precisely which functions would be captured by the idea of a 'basic' function, but in broad terms we understand that Google's proposal would capture those pieces of software code which perform functions interacting directly with the device's hardware, and that the further removed the software is from that interface, the less likely it is to fall within the definition. While in theory it might be possible to segment features and functionalities into various layers in this way, we do not agree that an operating system comprises only the most low-level functions, or that ought to be the CMA's focus. We consider that a description by reference to the operating system's role in intermediating hardware and software is a more appropriate description to capture all components fulfilling that function, even if it could be described as functioning at a layer 'on top' of the most basic functions. For example, such a description would ensure that Google's Fused Location Provider API which provides access to location data from hardware such as GPS and Wi-Fi is captured within the description of the Mobile Operating System, even though it could be described as being built 'on top' of basic functionality.

(c) With regard to our reference to the operating system acting as an intermediary, we note that Google acknowledged that one of the attributes of the mobile operating system is its 'mediation function' which allows apps

[119] Google's submission [✂].

to run on a device. In this context, Google has explained that such mediation can take place between hardware and software, between different hardware and between different apps on the device.[120] The concept of 'intermediary' in our description overlaps with Google's concept of 'mediation function'. In particular, in relation to the relationship between hardware and software on a mobile device, we do not consider there to be a difference between Google's description of the 'mediation function' and the CMA's description of the 'intermediary' role of the operating system.

4.28 In light of the above, we have decided to adopt the description of the Mobile Operating System as consulted on in the Proposed Decision.

Google products falling within the description of the Mobile Operating System

4.29 Our Guidance explains that the CMA will indicate which of the existing products offered by the firm it considers to be within the scope of the relevant digital activity when issuing the SMS decision notice. However, the SMS firm will need to assess on an ongoing basis during the designation period which of its products fall within the description of the relevant digital activity set out in the SMS decision notice.[121]

4.30 We note in this regard that features and functionalities forming part of the Mobile Operating System comprise numerous, and sometimes interconnected, layers. This indicates that each such layer may not be a standalone product or service. For example, Google has explained that [✂].[122] For that reason, we do not consider that it is appropriate or practicable to list every single feature and functionality forming part of the Mobile Operating System (and they may change over time). We consider that our functional description is sufficiently clear for Google and third parties to assess what is covered over the course of the designation period. However, the following sections provide clarity on the scope

[120] Google's submission [✂]. ('OS software has the following attributes: **Controls basic functions**. The OS controls basic functions of the device's hardware and software (e.g., processing, memory, and storage), allowing software apps to run on it. Features that run on top of these basic functions are not part of the OS. **Mediating function**. An OS allows apps to run on a device by providing a mediation function. That mediation can take place between hardware (e.g., receiver, microphone, speakers, camera, NFC chip, accelerometer, compass, and GPS receiver) and software; between different hardware (e.g., a mobile phone and a wearable); and between different apps on the device. **Connected to a device**. An OS must allow apps to run on the OS and control basic functions. Implicit in this definition is that an OS does so with reference to a device. Otherwise, the necessary elements of controlling basic functions and enabling apps to '*run*' on a device have no meaning.')

[121] CMA194, paragraph 2.107.

[122] Google's submission [✂].

of this digital activity as regards middleware, connectivity functionalities, voice assistants and digital wallets.[123]

Whether middleware is within scope

4.31 Middleware is a broad term used by certain stakeholders and covers a range of features and functionalities.[124]

4.32 Google raised a concern that the CMA's proposed description of the Mobile Operating System includes generically all middleware and possibly software apps, which we understand to mean native apps.[125] To clarify, the description does not capture *all* products or services that may be referred to by Google and other stakeholders as 'middleware'. In line with our functional description, only middleware which fits the description of the Mobile Operating System activity is in scope. Further, we do not consider native apps to be part of the Mobile Operating System because they do not act as an intermediary between hardware and software.

4.33 Google also made representations in relation to what it calls middleware in Google Play Services specifically. Google Play Services are a part of the Google Mobile Services suite that Google licenses to OEMs on a per-device basis and, according to Google, contains three types of 'middleware' functionality: (i) software that enables third-party apps to integrate Google's online services (for example, Ads APIs, Maps APIs, Analytics APIs and Fit APIs); (ii) [✂]; and (iii) software that provides value-added services that run 'on top of OS software'.[126]

4.34 In relation to the first two categories of Google Play Services, we agree with Google that these features and functionalities are not part of the Mobile Operating System activity because neither category acts as an intermediary between hardware and software, enabling apps and services to run on a mobile device. This is because the first category serves to enable apps to integrate with cloud-based services; and the second category is concerned with [✂].

[123] These are areas that were raised in stakeholder representations.
[124] For example, whilst Google uses this term to refer to certain functionalities it provides, Apple explained that it does not use the term 'middleware' in the ordinary course of business because it views its hardware and software as directly interacting and therefore does not track which of its software components match the description. Apple's response to Apple Proposed Decision, paragraph 27.
[125] Google's submission [✂].
[126] Google's submission [✂].

4.35 In relation to software that provides value-added services, we consider that there may be features and functionalities captured within the description of the Mobile Operating System activity because those features are concerned with acting as an intermediary between hardware and software, enabling apps and services to run on a mobile device.[127]

4.36 In the Proposed Decision, we provided Cast SDK and LiteRT as examples of 'middleware' in Google Play Services that act as intermediaries between the hardware and software of Android Mobile Devices. Google submitted that these features build on top of 'OS-level' functionalities that are available to all developers such that there are third-party middleware offerings available.[128] Further, Google submitted that some of these features are cross-platform (ie not only available on Android) so cannot be serving the purpose of an operating system.[129]

4.37 As explained above, we do not consider that the fact that features build 'on top' of basic functionalities prevents them from being part of a Mobile Operating System where they fulfil an intermediary role between hardware and software, enabling apps and services to run on a mobile device. Nor do we consider the availability of third-party offerings to be decisive as to whether Google's activities are captured within the scope of the digital activity in circumstances where the specific products otherwise form a logical and coherent part of the digital activity taking account of how that activity is carried out by Google and consumed by users. Indeed, there are examples of other services offered by Google that clearly fall within the Mobile Operating System description because they are part of AOSP, but for which third-party alternatives are available, eg the provision of certain media encoding and decoding functionality.

4.38 We therefore consider that 'middleware' provided as part of Google Play Services such as Cast SDK and LiteRT fall within the scope of the Mobile Operating System to the extent that they act as an intermediary between hardware and software on the mobile device, enabling apps and services to run on the mobile device.

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[127] We note that, despite having a different definition of Mobile Operating System, which is aligned with Google's preferred description, the European Commission considered some middleware to be part of the Android operating system under the DMA insofar as it contributes to controlling the basic functions of Google Android tablets and smartphones and to enabling software applications to run on them, thereby ensuring an effective functioning of Google Android' (European Commission, Decision of 5 September 2023 designating Alphabet as a gatekeeper pursuant to Article 3 of Regulation (EU) 2022/1925, paragraph 165).

[128] Google's submission [✂]; Google's submission [✂].

[129] Google's submission [✂].

Whether connectivity functionalities are within scope

4.39 Google submitted that the CMA's reference to connectivity functionalities is extraordinarily broad and wrongly equates the provision of functionalities built on top of the hardware with the Mobile Operating System.[130] To clarify, the description of the Mobile Operating System digital activity does not capture *all* connectivity functionalities. As noted above, in line with our functional description, for any features and functionalities to fall within the description of the Mobile Operating System, they need to have the characteristics outlined in the description of the digital activity; namely they need to act as an intermediary between hardware and software, enabling applications and services to run on Mobile Devices.

4.40 With this in mind, we consider that APIs providing access to some connectivity functionalities fall within our description of the Mobile Operating System digital activity. The connectivity functionalities referred to in this context are the functionalities provided to other software that enable wireless exchange of information such as Bluetooth, network connectivity and Wi-Fi. These functionalities cover both APIs providing 'low-level' access, such as to networking sockets, and those providing 'higher-level' access, such as those supporting the use of the HTTP protocol.[131] These APIs play an intermediary role by providing applications and services with direct or indirect access to the device's connectivity hardware through the Mobile Operating System.[132]

4.41 However, we do not consider that other types of connectivity functionalities, such as network protocols which are implemented in native apps themselves, act as an intermediary between hardware and software. This is because they are not offered to other software, and do not enable other software to function on Mobile Devices. These functionalities do not therefore fall within the scope of the Mobile Operating System activity.

4.42 Further, we note that the Mobile Operating System digital activity only concerns the activity carried out by Google and our description therefore only covers products, features and functionalities offered by Google. Accordingly, the

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[130] Google's submission [✂].

[131] The HTTP protocol is a standard communication protocol used by software to send and receive information over the internet, eg to and from a web server.

[132] Mobile UK's response to the Proposed Decision and [✂]'s response to the Proposed Decision submitted that the CMA should clarify that connectivity functionality (ie functionality enabling device connectivity, whether it be through Bluetooth, wi-fi, satellite, cellular, or other technology) is intermediated by operating systems, and that such intermediation is covered by the Google Mobile Platform designation. We consider that our description of the Mobile Operating System digital activity already adequately covers such intermediation between hardware and software.

description does not capture third-party software that provides connectivity functionalities for a device, such as Samsung Smart View.[133]

Whether voice assistants are within scope

4.43 **Voice Assistant (VA)** is AI-based software which allows users to control their device verbally. Google has said that the position in relation to VAs in the Proposed Decision was confused and does not provide a workable and principle-based approach that would support the application of substantive obligations.[134] Google also explained that Google's VA – Gemini Assistant – as well as Gemini extensions[135] are not part of the Mobile Operating System.[136]

4.44 To this end, we agree with Google that its VA does not fall within the scope of the Mobile Operating System digital activity because Gemini Assistant acts as a native app and not as an intermediary between software and hardware.[137] The description is not intended to capture voice assistants and all their supporting functionalities. In line with our functional description, only the functionality that fits the description of the Mobile Operating System digital activity will be caught within scope.

4.45 We also consider that the fact that Google's VA may have privileged access to certain Mobile Operating System functionalities (eg 'wake word' access) on particular Mobile Devices does not, in and of itself, make Google's VA part of the Mobile Operating System.

4.46 Whilst in the Proposed Decision, we set out that the Mobile Operating System digital activity included Gemini extensions, we have considered this afresh taking account of Google's explanation that Gemini extensions are app-level functionalities that allow other apps to integrate with Gemini Assistant.[138] In light of that, we agree that Gemini extensions do not act as an intermediary between other software and hardware on the device and thus fall outside of our description of the Mobile Operating System digital activity.

[133] Google suggested that third-party software that provides connectivity functionalities for a device will be captured. Google's submission [✂]. This is incorrect.
[134] Google's submission [✂].
[135] Gemini extensions, which Google recently renamed as Gemini connected apps, are integrations that allow users of the Gemini Assistant to interact with other apps and services.
[136] Google's submission [✂].
[137] We understand from our engagement with Ofcom that VAs may play an intermediary role between users and content under Part 6 of the Media Act 2024 for radio selection service users.
[138] Google's submission [✂]; Google's submission [✂].

4.47 However, there are certain features and functionalities that enable the operation of Google's VA and fall within the scope of the Mobile Operating System digital activity insofar as they act as an intermediary between hardware and software. For example, the 'intents' system[139] in the Android operating system that provides functionality for Google's VA to operate. This system enables on-device apps to communicate with each other, invoke each-others' functionality and respond to device events (such as the device starting to charge), therefore acting as an intermediary between these apps as well as the hardware.[140] We note in this regard that Google agrees that the system of intents is part of the Mobile Operating System.[141]

Whether digital wallets are within scope

4.48 A financial services firm submitted that digital wallets (including Google's wallet) must also be included in the scope of the Mobile Operating System activity.[142] A digital identity and age assurance provider submitted that the scope of Apple's digital activities must include not just the technical layers of the operating system and browsers, but also the identity, credential, and wallet functions that platforms bundle into them.[143]

4.49 We do not consider Google's digital wallet itself to be part of the Mobile Operating System because, whilst it interacts with the Mobile Operating System in order to be able to run on a mobile device, it does not itself fulfil an intermediary role between hardware and software.[144]

4.50 However, operating system-level functionalities supporting digital wallets fall within the Mobile Operating System activity. These functionalities, which include access to the near field communication (**NFC**) chip that is key hardware for contactless transactions, play an intermediary role between hardware and software, enabling the digital wallet to operate on a mobile device.

4.51 The fact that Google's digital wallet is not itself part of the Mobile Operating System digital activity does not affect our ability to intervene in relation to digital

[139] An intent is a piece of code in an app that requests an action from a component in the same app or in a different app on the user's device. Google's submission [✂].
[140] This reflects the set-up that the operating system's involvement is necessary for apps to communicate with each other on device.
[141] Google's submission [✂].
[142] [✂] Anonymous financial services firm's response to Proposed Decision, page 2
[143] [✂] Anonymous response to Proposed Decision, page 1.
[144] Proposed Decision, paragraph 4.33.

wallets in certain circumstances. For example, where appropriate and proportionate we may still apply conduct requirements for the purpose of preventing Google from using its position in relation to the Mobile Operating System to treat its own wallet more favourably than those of rival wallet providers.[145]

Conclusion

4.52 The Mobile Operating System is a digital activity which comprises the provision of a mobile operating system or equivalent, which acts as an intermediary between hardware and software on the mobile device, enabling software applications and services to run on the device. This digital activity includes:

(a) the operating system currently known as Android, that is used on Google's own Mobile Devices and licensed by Google to certain third-party OEMs;

(b) features and functionalities which act as an intermediary between hardware and software on the mobile device, enabling software applications and services to run on the device, including in particular:

(i) elements of 'middleware' such as parts of Google Play Services;

(ii) APIs providing access to connectivity functionalities;

(iii) features and functionalities that enable the operation of voice assistants; and

(iv) operating system-level functionalities supporting digital wallets.

Native App Distribution

This section sets out our conclusions on the Native App Distribution digital activity, including our response to submissions and evidence received since our Proposed Decision.[146] Our description is as follows:

[145] Section 20(3)(b) of the Act.

[146] Our Proposed Decision and the ITC, paragraphs 55-56 set out that:
a) a 'native app' means an app that is written to run on a specific operating system;
b) a 'native app distribution platform' means a platform for users to discover, download, and have apps automatically updated; and for businesses to have access to a large user base to whom they can distribute their apps and associated content; and
c) the most common method for distributing apps is through a mobile app store such as Google's Play Store.

Native App Distribution: the provision of a service which enables the installation, distribution and operation of native apps on Mobile Devices, which are apps written to run on the Mobile Operating System.

4.53 We invited views from stakeholders on our proposed description and scope of Google's native app distribution service in both the ITC and the Proposed Decision. The description set out in the Proposed Decision was the same as the description which we adopted in this decision as set out above. In the following sections we set out the representations we received in response to the Proposed Decision, and our findings.

Submissions on our description and scope of Native App Distribution

4.54 In response to the Proposed Decision, Google noted that the CMA's description of Native App Distribution included (i) the pre-installation, placement and defaults settings of Google's own apps on Android devices by OEMs; (ii) the process for users to 'sideload' native apps onto Android Mobile Devices; (iii) cloud management tools; (iv) developer tools for the developing, testing and distribution of native apps; and (v) middleware and APIs for the installation, distribution and operation of native apps.[147] Google explained that this description overlooks the fundamental differences between Android's open and iOS' closed systems including that:

(a) Android OEMs have the freedom to create attractive out-of-the-box experiences for users through pre-installation and placement agreements; and

(b) Users have the freedom to download and app developers have the freedom to distribute sideloaded apps and apps via third-party app stores.[148]

4.55 Google said that it considered the delineation of Native App Distribution to be too broad, particularly as regards (i) pre-installation, placement and defaults; and (ii) the process for users to sideload native apps on Android devices.[149]

[147] Google's response to Proposed Decision, paragraph 114.
[148] Google's response to Proposed Decision, [✂].
[149] Google oral representations [✂].

4.56 In response to the Proposed Decision, third parties provided the following submissions on our description and scope of the Native App Distribution digital activity:

(a) Pre-installation: Epic Games invited the CMA to clarify that Google's policies, practices and agreements which impact the pre-installation of all apps (whether first- or third-party) is a relevant activity falling within Native App Distribution.[150] It submitted that OEMs pre-installing third-party native apps (and app stores) is a form of alternative content distribution within Google's Mobile Ecosystem, albeit that the pre-installation and prominent placement of the Play Store and Google policies and contractual arrangements limit the competitive constraint from alternative app stores.[151] The Coalition for App Fairness welcomed the inclusion of pre-installation of first party apps within the description of Native App Distribution.[152]

(b) Developer tools: Epic Games agreed with the inclusion of developer tools and middleware in the description of Native App Distribution, as set out in the Proposed Decision.[153] The Coalition for App Fairness stated that the confirmation that Native App Distribution includes cloud management tools such as Google Play Console and developer tools such as Android Studio and Firebase is crucial.[154]

(c) Sideloading and other issues: Epic Games said that app distribution through channels outside of app stores, discovery and review of apps, app updates, performance and design should be included within Native App Distribution.[155]

Our assessment

4.57 Native App Distribution comprises 'the provision of a service by means of the internet' within the meaning of section 3(1)(a) of the Act. This is because it is the provision of a service which enables the installation, distribution and

[150] Epic Games' response to Proposed Decision, pages 3–4.
[151] Epic Games' response to Proposed Decision, page 3.
[152] Coalition for App Fairness' response to Proposed Decision, page 1. Coalition for App Fairness is an association of app developers, including Match Group, Proton and Spotify. We note that Epic is a member of the Coalition for App Fairness.
[153] Epic Games' response to Proposed Decision, page 3.
[154] Coalition for App Fairness' response to Proposed Decision, page 1.
[155] Epic Games' response to Proposed Decision, page 3.

operation of native apps on Mobile Devices, and is provided by means of the internet as commonly understood.

Whether Native App Distribution for smartphones and tablets forms part of a single digital activity

4.58 When describing the Native App Distribution activity and considering which of Google's products and services fall within its scope, we have looked at how the Play Store is offered by Google and consumed by end-users and app developers.[156] Google makes the Play Store available to users on both smartphones and tablets. It has the same app review process for smartphones and tablets; and app developers can distribute one app for both smartphones and tablets.[157]

4.59 We have not received any submissions on this point and conclude that it is appropriate to describe a single Native App Distribution activity which includes the Play Store for both smartphones and tablets.

Whether pre-installation and placement of apps and default settings are within scope

4.60 In the Proposed Decision, we set out that the Native App Distribution digital activity includes the pre-installation, placement and default settings of Google's own apps on Android Mobile Devices by OEMs. We have re-considered this in light of Google's submissions that OEMs are in control of pre-installation, placement, and defaults.[158]

4.61 Google's agreements with device manufacturers, as detailed in Appendix C, govern the pre-installation, placement and default settings relating to Google apps on OEM-manufactured devices, and the Android operating system defines which apps can be set as 'default' by both the user and OEMs. These agreements mean that in practice OEMs promote Google's apps and services when they use Android. Accordingly, the pre-installation, placement and settings which determine default app status are closely linked to Google's

[156] As set out above, the Guidance explains that the CMA can adopt a functional approach to describing a digital activity by reference to the nature of the products and how they are offered and consumed: CMA194, paragraphs 2.10–2.11.
[157] Google's response to section 69 notice [✂].
[158] Google's response to Proposed Decision, [✂]; Google oral representations [✂].

provision of the Mobile Operating System digital activity rather than being part of the Native App Distribution digital activity.

4.62 The Native App Distribution digital activity is concerned with the provision of a service which enables the installation, distribution and operation of native apps on Mobile Devices. Pre-installation, placement and settings which determine default app status do not involve the provision of a service which meets our description of this digital activity for the purposes of section 3(1)(a) of the Act and they are therefore outside of the scope of that activity.

4.63 Some third parties emphasised the importance of including pre-installation of first party- and third-party apps within the scope of the Native App Distribution digital activity, in order to ensure that the CMA can address any Google policies, practices and agreements which impact the pre-installation of apps.

4.64 We consider that our powers to impose conduct requirements could allow us to intervene where appropriate and proportionate in relation to any such concerns, without pre-installation being included within the scope of the Native App Distribution digital activity. For example, in relation to a concern around pre-installed apps being placed in a prominent position or set as a default, conduct requirements could apply for the purpose of obliging a designated undertaking to present to users any options or default settings in relation to the relevant digital activity (in this case, the Mobile Platform) in a way that allows those users to make informed and effective decisions in their own best interests about those options or settings.[159] The CMA also has powers to intervene where there are competition concerns about leveraging of market power.[160]

Whether developer tools are within scope

4.65 In the Proposed Decision, we set out that certain tools, APIs and middleware form part of the Native App Distribution activity. In its response, Google simply noted that the Proposed Decision included cloud management and developer tools, as well as middleware and APIs for the installation, distribution and operation of native apps, but did not explain whether and, if so, why it considered they should be included or excluded.[161] An app developer and a developer association submitted that developer tools should be included.[162]

[159] Section 20(2)(e) of the Act.
[160] Sections 20(3)(b) and 20(3)(c) of the Act.
[161] Google's response to Proposed Decision, paragraph 114–[✂].
[162] Epic Games' response to Proposed Decision, page 3; Coalition for App Fairness' response to Proposed Decision, page 1.

4.66 Having considered the representations, we have decided that developer tools are in scope of the Native App Distribution digital activity only where they fit the description of that digital activity. Our view is that the following developer tools fall within the scope of the Native App Distribution activity (ie they form part of that service) for the reasons set out below:

(a) Certain cloud management tools such as Google Play Console enable the installation, distribution and operation of native apps on Mobile Devices and are part and parcel of Google's Play Store service for developers. Google Play Console falls within our description because it provides services such as app publishing portals that enable the distribution of native apps to Mobile Devices.

(b) Certain APIs enable the installation, distribution and operation of native apps on Mobile Devices, for example certain Google Play Developer APIs.[163] As above, we understand that these interfaces are offered and consumed as part and parcel of Google's Play Store service to developers. Such interfaces fall within our description because they enable app developers to automate aspects of application deployment and management, thereby enabling the installation, distribution and operation of native apps on Mobile Devices.

(c) Certain functionality (which could be described as middleware) allowing apps to integrate features linked to Google's Play Store falls within our description to the extent that it enables the installation, distribution and operation of native apps on Mobile Devices. For example, apps which integrate with Google Play Billing rely on functionality provided by Google Play Services to operate.[164]

4.67 Developer tools that support the development and testing of native apps, such as Android Studio or Firebase, are not part of the service provided by Google that enables the installation, distribution and operation of native apps on Mobile Devices. Whilst it is clear that such tools have some role in enabling app developers to prepare their apps for distribution on app stores, in considering how these products are offered and consumed, we consider that they are app development and testing tools used by app developers to build and test their apps *before* they are distributed via app stores.

[163] See https://developer.android.com/google/play/developer-api.
[164] See Google Play's billing system documentation, https://developer.android.com/google/play/billing/alternative

4.68 An app developer also requested that the CMA expressly mentions the Android SDK as being within the scope of the relevant digital activities.[165] The Android SDK comprises a broad set of features and functionality made available to app developers, including software libraries and developer tools. Our position on developer tools such as Android Studio is explained above. Aside from that, certain features and functionalities within the Android SDK may fall within the scope of the designation to the extent that they meet the description of relevant digital activities.

Whether sideloading is within scope

4.69 One app developer requested clarification that Native App Distribution includes the distribution of native apps through channels outside of app stores, such as sideloading.[166] Sideloading is where an app developer's native app is downloaded by the user directly from the developer's web page or via peer-to-peer transfer. We have considered afresh whether sideloading should be included within the scope of the Native App Distribution digital activity. Whilst Google allows sideloading on Android devices through the functionality forming part of the Android operating system which enables intermediation between software (apps) and hardware (the mobile device), the act of sideloading itself is carried out by end-users and is not therefore a service which is provided by Google. For this reason we consider that sideloading is not within the scope of the Native App Distribution digital activity.

4.70 Our decision that sideloading is not in scope of the Native App Distribution digital activity does not remove our ability to intervene in relation to sideloading in certain circumstances. For example, where appropriate and proportionate we may apply conduct requirements for the purpose of preventing a designated undertaking from restricting the ability of users to use products of other undertakings, which could include other apps or app stores.[167]

Conclusion

4.71 Native App Distribution is a digital activity which comprises the provision of a service which enables the installation, distribution and operation of native apps on Mobile Devices, which are apps written to run on the Mobile Operating System. This includes the Play Store and features and functionalities such as

[165] Epic Games' response to Proposed Decision, page 2.
[166] Epic Games' response to Proposed Decision, page 3.
[167] Section 20(3)(h) of the Act.

cloud management tools, APIs and middleware that enable the installation, distribution and operation of native apps on Mobile Devices.

Mobile Browser and Browser Engine

This section sets out our conclusions on the Mobile Browser and Browser Engine digital activity, including our response to submissions and evidence received since our Proposed Decision.[168] Our description is as follows:

Mobile Browser and Browser Engine: The provision of a mobile browser and browser engine which comprises:

(a) the provision of a software application that enables users of Mobile Devices to access and search the internet and interact with web content; and

(b) the provision of a mobile browser engine, which is the underlying technology which native apps on Mobile Devices use to transform web page source code into content with which users can engage.

4.72 We invited views from stakeholders on our proposed description and scope of Google's mobile browser and browser engine digital activity in both the ITC and the Proposed Decision. The description set out in the Proposed Decision was the same as the description which we adopted in this decision as set out above. The Proposed Decision further explained that we considered in-app browsing to fall within the scope of this digital activity. In the following sections we set out the representations we received in response to the Proposed Decision, and our findings.

[168] Our Proposed Decision and the ITC, paragraphs 62–67 set out that:
a) A 'mobile browser' translates website code into content that is shown on the device screen to users. Mobile browsers have user-facing functionality such as favourite webpages and browsing history, and store users' data such as passwords and payment details. A default search engine is set as part of the browser;
b) A 'mobile browser engine' is the underlying technology which browser applications on Mobile Devices use to transform web page source code into content which users can see and engage with. Browser engines are crucial for determining browser performance and functionalities;
c) As part of our investigation, we would consider Google's Chrome browser which is pre-installed on almost all Android devices and had a share of supply of 77% on Android devices in 2023; and its Blink browser engine, which had a share of supply of 95% of browsers operating on Android devices; and
d) Web content can also be accessed through native apps, in 'in-app browsers'. In-app browsers are used in apps such as Snapchat, Facebook, search widgets in Google search and email clients such as Gmail.

Submissions on our description and scope of Mobile Browser and Browser Engine

4.73 In response to the Proposed Decision, Google submitted that the description of Mobile Browser and Browser Engine is unduly broad as it would potentially capture any (future) app or innovation that 'enables users of Mobile Devices to access and search the internet and interact with web content' beyond Chrome as a native mobile browser app.[169]

4.74 Google further submitted that it considered there was no reason to include 'search' in the description as browsers are not search engines.[170]

4.75 Google did not comment on the proposal to describe the Chrome web browser on Android smartphones and Android tablets together. In relation to the Blink browser engine, Google submitted that Blink is developed as a cross-platform product and there are no substantive differences in how Blink operates on smartphones and tablets.[171]

4.76 Third parties provided the following submissions on our description and scope of the Mobile Browser and Browser Engine digital activity:

(a) Single digital activity: Mozilla supported Mobile Browser and Browser Engine being a single digital activity, stating that they are closely integrated services, with all major browser engine developers seeking to base their browsers on their respective browser engines.[172]

(b) In-app browsing: Mozilla agreed with the CMA's description of in-app browsing.[173]

(c) Adjacent service features: [✂] suggested explicitly setting out and excluding certain 'adjacent service features' at software module level separately from the description of Mobile Browser and Browser Engine. It submitted that these functionalities are not intrinsic to the browser's core purpose of rendering web pages to end-users and are discrete services that benefit from competition.[174]

[169] Google's response to Proposed Decision, paragraph 117.
[170] Google oral representations [✂].
[171] Google's response to section 69 notice [✂].
[172] Mozilla's response to Proposed Decision, page 2.
[173] Mozilla's response to Proposed Decision, page 2.
[174] [✂]'s response to Proposed Decision, pages 1–2. [✂] is an advocacy group of businesses [✂].

Our assessment

4.77 The provision of a mobile browser and browser engine constitutes 'the provision of one or more pieces of digital content' within the meaning of section 3(1)(b) of the Act.[175]

Whether Mobile Browser and Browser Engine for smartphones and tablets forms part of a single digital activity

4.78 When describing the Mobile Browser and Browser Engine activity and considering which of Google's products and services fall within its scope, we have looked at how Chrome and Blink are offered by Google and consumed by end-users and app developers.[176] Google makes the mobile browser available for users on both smartphones and tablets; and the browser engine is developed as a cross-platform product and there are no substantive differences in how the browser engine operates on smartphones and tablets.[177] Mozilla agreed with this.[178]

4.79 We conclude that it is appropriate to describe a single Mobile Browser and Browser Engine digital activity which includes Chrome and Blink for both smartphones and tablets.

Breadth of the description of Mobile Browser and Browser Engine

4.80 Google's main comment on the description of the digital activity was that it is unduly broad and could capture future innovations beyond Chrome.[179]

4.81 Our Guidance states that the description of the relevant digital activity will set out the overall purpose of the digital activity.[180] We do not consider that the description of the overall purpose of the Mobile Browser and Browser Engine activity is unduly broad given that it is confined to ways of accessing and searching the internet and interacting with web content in ways that involve a

[175] This is because 'digital content' is defined in section 330 of the Act as 'data which is produced and supplied in digital form' and therefore encompasses apps and other software. The Explanatory Notes to the Act clarify that, in relation to the definition of 'digital content', 'data' would include software (paragraph 1888). The Guidance explains that digital content includes software, music, computer games and apps; CMA194, paragraph 2.9.
[176] As set out above, the Guidance explains that the CMA can adopt a functional approach to describing a digital activity by reference to the nature of the products and how they are offered and consumed. CMA194, paragraphs 2.10–2.11.
[177] Google's response to section 69 notice [✂].
[178] Mozilla's response to Proposed Decision, page 2.
[179] Google's response to Proposed Decision, paragraph 117.
[180] CMA194, paragraph 2.107.

browser engine. This therefore limits the extent to which the description would capture future innovations in how users engage with web content.

4.82 Google also requested that the description should not include a reference to 'search[ing]' the internet.[181] We consider that a browser's key purpose (in combination with a search engine) is to enable users of Mobile Devices to access and search the internet and interact with web content, such that we do not consider it necessary to amend the description.

Describing Google's Mobile Browser and Browser Engine as a single digital activity

4.83 The Mobile Browser and Browser Engine are closely integrated pieces of digital content which function as a package on Google's Mobile Platform. Taking account of how Google provides the mobile browser and browser engine to users of its Mobile Platform, how these users consume them and the interlinkages among them,[182] they constitute 'the provision of one or more pieces of digital content' under the Act,[183] and as such form part of a single digital activity enabling end-users to browse the web on Android devices.

4.84 In order to allow mobile browsing Google supplies the following elements which comprise the Mobile Browser and Browser Engine digital activity: (i) its back-end browser engine, currently Blink, which renders websites that users can see and engage with; and (ii) its front-end mobile browser, currently Chrome, which provides user facing functionality. Indeed, while users may not always be aware of the existence of the browser engine, it is the core underlying software component of a mobile browser that handles the rendering and display of web content.[184] Google also supplies its back-end browser engine, Blink, to support third-party browsers operating on Google's Mobile Platform.

4.85 In relation to how Google offers Chrome and Blink, we consider that, as a matter of fact, both Chrome and Blink are pieces of digital content offered by

[181] Google oral representations [✂].
[182] Our Guidance sets out that, in identifying a digital activity and considering which of the firm's products it may comprise, 'the CMA may consider how the potential SMS firm structures itself and its business model, how businesses and consumers use and access its products **and any linkages among them**' (emphasis added). CMA194, paragraph 2.10.
[183] Section 3(1)(b) of the Act.
[184] The browser engine is responsible for processing HTML, CSS, and JavaScript code, and rendering websites into the visual format that users see on their Mobile Devices. In practical terms, this means the browser engine provides important features which determine the speed and performance of the browser. See Mobile Browsers and Cloud Gaming Final decision report, March 2025 (**MBCG MI**), page 46.

Google to end-users to enable end-users to browse the web. Neither of these products could, individually and in isolation, enable web browsing on Google devices. This is because:

(a) The browser cannot function without the underlying browser engine, which is the core[185] underlying software component of a mobile browser. Under Google's current business model, Chrome is never offered without Blink.

(b) The browser engine alone cannot provide browser functionality without a browser user interface. Chrome and Blink are frequently offered together: 80% of Android users use Chrome, based on Blink, to access the web.[186] Blink is sometimes offered by Google without Chrome to provide browsing functionality on Android devices: this occurs for 18% of Android users who use third-party browsers with Blink.

4.86 Therefore, we consider that Google typically offers its Mobile Browser and Browser Engine on its Mobile Platform in a closely integrated manner, comprising Chrome and Blink, or Blink for use with a third-party browser. In the significant majority of cases on Google's Mobile Platform, Google's mobile browser and browser engine integrate to allow for browsing which is the core of the digital activity.

4.87 In relation to how the mobile browser and browser engine are consumed, evidence shows that end-users may not be aware of the existence of the browser engine when using a browser.[187] This is because both products work in conjunction to offer a seamless browsing experience, eg through providing user affordances.[188] This is consistent with previous CMA findings.[189] Google's

[185] We understand that the browser engine source code can sometimes constitute the vast majority of a browser's code. Note of call with [✂].
[186] 'Browser Market Share Report for 2025 Q2', accessed 17 September 2025.
[187] As confirmed by four browser vendors: Note of call with Mozilla [✂]; Note of call with [✂]; Note of call with [✂]; Note of call with [✂]. Mozilla noted that users are not typically aware of the browser engine being used in the browser, although its user research team conducted a study revealing that a non-trivial percentage of people surveyed indicated they recommended Firefox because it was not Chromium-based, suggesting some awareness of browser engine differentiation.
[188] A browser vendor stated that the line between browser and browser engine can be blurry from an end-user perspective, as both products offer a seamless browsing experience. This browser vendor also stated that the browser engine and browser user interface work in conjunction to provide user affordances, eg permission prompts from the browser to use the device's camera when joining a video call. The browser engine responds to actions and requests that come from the user via the browser user interface. Note of call with [✂]. Similarly, another browser vendor stated that the border between functionality from the browser versus the browser engine is not precisely defined, Note of call with [✂].
[189] MBCG MI Final Decision Report, paragraph 3.33: 'from a user's perspective, a browser engine is not substitutable but rather a complement to the browser product that is built on top, as both elements are needed for the user to navigate the web. Therefore, while the two products tend to be used together, there is limited demand-side

browser engine, Blink, responds to actions and requests that come from end-users via the browser user interface which means that in those instances end-users 'consume' Blink in order to browse the web on Android devices.

4.88 In relation to the use of Blink for third-party browsers, Google supplies third-party developers (rather than end consumers) with Blink but not Chrome. In such cases, Google provides one, rather than both, of the relevant pieces of 'digital content' within section 3(1)(b) of the Act. However, it is a vital part of digital content in that the third-party browser is then built on Blink, and Blink responds to actions and requests coming from end-users via the third-party browser user interface. In practical terms, the mobile browser engine provides important features which determine the speed and performance of the browser in terms of stability and compatibility with different types of web content and websites. Moreover, end-users of Google's Mobile Platform 'consume' Blink together with a mobile browser in order to browse the web on Android devices, regardless of whether the browser is Chrome or another Blink-based browser, and in either case they are unlikely to know about the role played by Blink. Accordingly, Google's provision of a browser engine is covered by the Mobile Browser and Browse Engine digital activity whether or not it is supplied together with Chrome.

4.89 Google did not comment on the proposal to describe its mobile browser and browser engine as a single digital activity, but acknowledged the interlinkages between them, stating that a browser engine provides backend infrastructure that allows a browser to work.[190] We note that the only third party who specifically commented on our proposal (a browser developer) supported it, noting that the mobile browser and browser engine are closely integrated services.[191]

4.90 Having considered all of the above facts and evidence in the round, we describe the Mobile Browser and Browser Engine together as the provision of a single digital activity.

substitutability between them from a functional perspective, as the browser engine is not typically used instead of the browser but rather in conjunction with it.'

[190] Google's response to Proposed Decision, paragraph 108a.

[191] Mozilla noted that, as a practical matter, each of the major browser engine developers that remain in existence today seeks to develop a browser (Apple with Safari, Google with Chrome, and Mozilla with Firefox) based on their respective browser engine (WebKit, Blink, and Gecko respectively). Mozilla's response to Proposed Decision, page 2.

Whether in-app browsing and adjacent service features are within scope

In-app browsing

4.91 In-app browsing refers to the situation in which a user accesses web content while they are already in a native app that is not a dedicated mobile browser.[192] In-app browsing relies on an underlying mobile browser engine such as Blink to render web content. The only third party (Mozilla) who commented on the CMA's description of in-app browsing agreed with it.[193]

4.92 Google made no submissions in relation to in-app browsing. Given the functional description of in-app browsing relying on an underlying mobile browser engine, we consider that the provision of a mobile browser engine (currently Blink) for in-app browsing is captured within our description of the Mobile Browser and Browser Engine digital activity.

4.93 We recognise that Google does not control the user experience designed by developers of third-party in-app browsers. For the avoidance of doubt, third-party in-app browsers are not themselves in scope of the Mobile Browser and Browser Engine digital activity, in the same way that third-party mobile browsers using Blink are not. However, the scope of the Mobile Browser and Browser Engine digital activity includes Google's mobile browser engine, Blink, as used in third-party in-app browsers on Android devices.

Adjacent service features

4.94 One third party suggested that certain 'adjacent service features' should be separated from the description of Mobile Browser and Browser Engine.[194]

4.95 While there is not a clear definition of what adjacent service features constitutes, we do not consider it is necessary to describe such features as a separate digital activity and we will refer back to the description of the Mobile Browser and Browser Engine digital activity to determine what is in scope.

[192] MBCG MI Final Decision Report, paragraph 2.55.
[193] Mozilla's response to Proposed Decision, page 2.
[194] [✂]'s response to Proposed Decision, pages 1–2.

Conclusion

4.96 The Mobile Browser and Browser Engine digital activity comprises the provision of a software application that enables users of Mobile Devices to access and search the internet and interact with web content; and the provision of a mobile browser engine, which is the underlying technology which native apps on Mobile Devices use to transform web page source code into content with which users can engage. This includes the provision of Google's mobile browser engine for use in third-party mobile browsers; and the provision of Google's mobile browser engine as used in third-party in-app browsers on Android devices. Google's current products, Chrome and Blink, are within the scope of this digital activity.

Description of the digital activities

4.97 For the reasons set out above, we describe the following three digital activities for the purposes of this decision:

(a) **Mobile Operating System**: the provision of a mobile operating system or equivalent, which acts as an intermediary between hardware and software on the mobile device, enabling software applications (referred to as applications or apps) and services to run on the device.

(a) **Native App Distribution:** the provision of a service which enables the installation, distribution and operation of native apps on Mobile Devices, which are apps written to run on the Mobile Operating System.

(b) **Mobile Browser and Browser Engine**: the provision of a mobile browser and mobile browser engine, which comprises:

(i) the provision of a software application that enables users of Mobile Devices to access and search the internet and interact with web content; and

(ii) the provision of a mobile browser engine, which is the underlying technology which native apps on Mobile Devices use to transform web page source code into content with which users can engage.

4.98 Based on Google's current business model, we conclude that the above digital activities include:

(a) For the Mobile Operating System:

(i) the operating system currently known as Android, that is used on Google's own Mobile Devices and licensed by Google to certain third-party OEMs; and

(ii) features and functionalities which act as an intermediary between hardware and software on the mobile device, enabling software applications and services to run on the device, including in particular:

(1) elements of 'middleware' such as parts of Google Play Services;

(2) APIs providing access to connectivity functionalities;

(3) features and functionalities that enable the operation of voice assistants; and

(4) operating system-level functionalities supporting digital wallets.

(b) For Native App Distribution:

(i) the installation, distribution and operation of native apps through the Play Store; and

(ii) features and functionalities such as cloud management tools, APIs and middleware that enable the installation, distribution and operation of native apps on Mobile Devices.

(c) For the Mobile Browser and Browser Engine:

(i) Google's mobile browser, Google Chrome; and Google's mobile browser engine, Blink.

4.99 This list may be updated by the CMA in the course of the designation period; this could be in response to developments identified by (i) Google pursuant to its obligation to self-assess on an ongoing basis the scope of what falls within the description of the relevant digital activity; and/or (ii) further work and monitoring undertaken by the CMA.[195]

[195] See CMA194, paragraphs 2.107–2.108.

Grouping Mobile Operating System, Native App Distribution and Mobile Browser and Browser Engine

This section explains our decision to group Google's digital activities.

We conclude that the Mobile Operating System, Native App Distribution, and Mobile Browser and Browser Engine activities are a single grouped digital activity, referred to as a Mobile Platform.

These activities can be carried out in combination with each other to fulfil a specific purpose reflecting the reality of how they are provided and consumed in practice: facilitating interactions between users and providers of digital content and services on Mobile Devices in order to enable users to access, view and engage with such content and services on their Mobile Devices.

4.100 The CMA may treat two or more of the potential SMS firm's digital activities and the products within those as a single digital activity where either of the following conditions is satisfied: (a) they have substantially the same or similar purposes; or (b) they can be carried out in combination to fulfil a specific purpose.[196]

4.101 Where the CMA groups two or more of the potential SMS firm's activities and the products within those into a single digital activity, the SMS assessment will relate to the grouped activity as a whole.[197]

4.102 We conclude that (i) the legal conditions for grouping Google's three digital activities into a single activity are met under section 3(3)(b); and (ii) exercising the power to group Google's activities in this case is consistent with the underlying purpose of the digital markets competition regime.

Submissions on grouping

4.103 In response to the Proposed Decision, Google submitted that a core error that runs through the CMA's analysis is the characterisation of native app ecosystems and web ecosystems as forming part of a single grouped activity, which overlooks fundamental differences between them. It argued that these differences are borne out by the Mobile Browsers and Cloud Gaming Market Investigation (**MBCG MI**) which found that websites/web apps and native apps

[196] Section 3(3) of the Act; CMA194, paragraph 2.13.
[197] CMA194, paragraph 2.16.

are not substitutable, are accessed in different ways, offer different content and functionality, and undergo different development processes.[198] Google submitted that the suite of products at issue cannot be used together to fulfil a specific purpose within the meaning of section 3(3)(b):[199]

(a) The ordinary, common-sense 'purpose' of Play is to let users download apps on Android devices; whereas the ordinary, common-sense 'purpose' of Chrome is to let users browse the web.

(b) As a technical matter, it is incorrect to state that the four products can be deployed together. Consumers use app stores and browsers separately from each other—not together—depending on whether they want to install native apps via the store or visit websites.

(c) The products are supplied under different agreements to different end-users and businesses. Insofar as OEMs or users procure a situation where all four components are present on a single device, that is a matter of OEM or user choice rather than Google offering these products as part of a single suite.

4.104 Google also submitted that:

(a) The products at issue do not have substantially the same or similar purpose within the meaning of section 3(3)(a);[200] and

(b) SEMP cannot be sensibly assessed for the Google Mobile Platform as a whole, distinct from its individual components.[201]

4.105 The majority of third parties who commented on the CMA's proposal to group Google's digital activities into a single Mobile Platform activity were supportive,[202] with several noting that a holistic approach is necessary to reflect the reality of Google's business model as an ecosystem. For example:

[198] Google's response to Proposed Decision, paragraphs 103–106.
[199] Google's response to Proposed Decision, paragraph 109.
[200] Google's response to Proposed Decision, paragraph 108.
[201] Google's response to Proposed Decision, paragraphs 110–111.
[202] Responses to the Proposed Decision from The Coalition for App Fairness, page 1; [✂] an anonymous party, page 2; Epic Games, page 4; Innovate Finance, page 1; [✂]; [✂]; Mozilla, pages 2–4; Which?, page 1.

(a) An app developer ([✂]) stated that, for third parties, competition depends not on isolated activities, but on the way the entire platform is controlled;[203]

(b) A browser vendor (Mozilla) noted that a typical 'user journey' when using their mobile device might involve accessing content or services via a native app and accessing other content or services through their browser, each of which is technically enabled by (and in fact cannot be separated from) the architecture of the underlying operating system;[204]

(c) A consumer association (Which?) stated that, from a consumer perspective, although the digital activities may be 'individually recognisable' to users, it is only by using all of the digital activities in combination that users can make full use of their devices;[205] and

(d) An app developer (Epic) considered that grouping is necessary in order to ensure that Google does not have the opportunity to evade compliance with measures imposed by the CMA in respect of one digital activity, by adopting measures in respect of other digital activities which would undermine those measures;[206] similarly, a browser vendor (Mozilla) noted that if the activities were not grouped together as one digital activity, there is a danger of an enforcement gap, eg where the operation of Google's Play Store and/or the Android operating system has an effect on mobile browsers.[207]

4.106 Three third parties were unsupportive of grouping, noting the following issues: (i) the competitive dynamics differ substantially between each individual digital activity with different user and developer experience; (ii) grouping may obscure important differences in user control and competitive dynamics; (iii) grouping has implications for remedies and oversight and could have an impact on innovation and security; and (iv) the conditions for 'clustering' products for the purposes of analysing competition in a particular market do not appear to have been met.[208] Two third parties who supported grouping of the digital activities

[203] [✂] Anonymous response to Proposed Decision, page 4.
[204] Mozilla's response to Proposed Decision, page 3.
[205] Which?'s response to Proposed Decision, page 1.
[206] Epic Games' response to Proposed Decision, page 4.
[207] Mozilla's response to Proposed Decision, page 3.
[208] Information Technology & Innovation Foundation's response to Proposed Decision, pages 1–2; Consumer Choice Center's response to Proposed Decision, page 3; [✂] Anonymous financial services firm's response to Proposed Decision, pages 6–7.

urged the CMA to bear in mind practical and legal distinctions between the activities in its analysis.[209]

Our assessment

Legal framework and approach

4.107 As set out above, the Act allows us to group two or more digital activities carried out by a single undertaking as a single digital activity where:[210]

(a) the activities have substantially the same or similar purposes; or

(b) the activities can be carried out in combination with each other to fulfil a specific purpose.

4.108 The Guidance explains that the CMA will decide on the facts of each case whether or not to treat two or more of the potential SMS firm's digital activities and the products within those as a single digital activity for designation purposes. The Guidance also states that, in deciding whether to group two or more digital activities, the CMA will interpret the statutory conditions broadly.[211] For example, the concept of 'purpose' may refer to any relevant aspect of how the products are made, marketed, sold, accessed, or consumed, and may therefore relate to customer needs or preferences rather than technical complementarity. The Guidance gives a non-exhaustive list of examples of circumstances where it may be appropriate to group activities into a single activity, including the example of products that are usually purchased or used in combination by potential customers.[212]

4.109 In this case, when considering the specific purpose for which the relevant digital activities may be carried out in combination under section 3(3)(b) of the Act, we have taken account of, among other things, how those activities are: (i) provided by Google on the one hand; and (ii) consumed by users on the other. Approaching it in that manner means that any grouping of digital activities will reflect how the relevant digital activities are carried out in practice. That is a

[209] [✂]'s response to Proposed Decision, pages 3–4; [✂]'s response to Proposed Decision, pages 2–3.
[210] Section 3(3) of the Act. Explanatory notes to the Act, paragraph 103.
[211] CMA194, paragraph 2.14.
[212] The Explanatory Notes to the Act also provide instructive grouping examples as follows: (i) a number of services under different brands with a common function, allowing users, such as advertisers and publishers, to communicate with each other under section 3(3)(a); and (ii) services and products which are part of the same supply chain, such as services selling advertisements and the provision of an advertising platform under section 3(3)(b).

valuable lens through which to identify and, as appropriate, group activities in a manner which reflects the real-world connections between different products offered by a single firm (here, Google).

Whether the activities can be carried out in combination with each other to fulfil a specific purpose

4.110 The three relevant digital activities (the Mobile Operating System, Native App Distribution, and Mobile Browser and Browser Engine) each consist of the provision of a service by means of the internet or the provision of digital content, by Google.

4.111 Each of the three digital activities has its own functionalities, and if seen in isolation their respective purposes could be described in different ways depending on the particular context.[213] However, they are each important building blocks within Google's Mobile Platform in facilitating interactions between users of Mobile Devices on the one hand, and providers of digital content and/or services on Mobile Devices on the other. Thus:

(a) Google's Android operating system is pre-installed software that acts as the intermediary between hardware (Android smartphones and tablets) and software; this software (ie the operating system) therefore facilitates interactions between users and providers of digital content and services by providing the necessary technical bridge between the user of the mobile device itself and the content providers;

(b) Google's native app distribution, through the Play Store, provides the channel through which native apps are provided on most Android Mobile Devices; facilitating interactions between users and providers of digital content and services and which relies upon the operating system to reach the device;

[213] In disagreeing with our approach to grouping, Google referred to our MBCG MI decision of 12 March 2025, including our conclusion that mobile browsers and app stores are technically different products and are regarded as serving different purposes within their broader ecosystem (Google's response to the Proposed Decision, paragraph 106). In that decision, we decided that there are separate product markets for mobile operating systems, mobile app distribution, mobile browsers and browser engines. However, under section 3 of the Act we are concerned to identify whether *different* products and services, which may well be in different product markets, can be provided in combination to fulfil a specific purpose. The fact that a set of products and services when seen in isolation may serve different purposes within their respective product markets does not mean that they cannot *also* be supplied *in combination* to fulfil a specific purpose.

(c) Google's mobile browser and browser engine, which includes Chrome and Blink, provides the route by which users access content offered on the web by content providers; again, this digital activity facilitates interactions between users and providers of digital content and services by providing the user interface and underlying technology to transform web page source code into content with which users can engage via their devices.

4.112 In practice, and consistent with our prior work in respect of mobile ecosystems,[214] the evidence shows that Google's operating system, app store and browser and browser engine across Android Mobile Devices are provided (or 'carried out') in an integrated manner. Google submitted that this is a matter of OEM or user choice.[215] However, whilst from a purely contractual perspective each component is subject to a separate legal arrangement with Android OEMs, the cumulative effect of these agreements in practice is that Google's Play Store and Chrome are not only licensed and distributed *alongside* Google's Android, but tend to be taken up as an integrated package by OEMs:

(a) The Play Store is the primary means of downloading native apps on Android Mobile Devices, accounting for [✂] [90 – 100]% of native app downloads on Android Mobile Devices in 2024.[216] Under Google's agreements with device manufacturers, manufacturers that comply with the baseline compatibility requirements set out in the Compatibility Definition Document can license Google first party apps and the Google Play Services if they agree to pre-install and place Play Store on the device home screen;[217]

(b) Chrome is the most used browser on Android (used by 80% of Android device users). Chrome is pre-installed on the majority of Android devices in the UK (approximately 90 – 100%[218]) due to Google's agreements with OEMs which contain provisions financially incentivising pre-installation and prominent placement of Chrome.[219] Chrome always runs on the Blink

[214] MEMS, paragraphs 2.20, 2.45.
[215] Google's response to Proposed Decision, paragraph 109.
[216] Source: CMA analysis of data from market participants.
[217] As explained in Appendix C, under the EMADA, OEMs pay Google a licence fee for each device distributed with Google's first party applications.
[218] The MBCG MI found that Chrome was pre-installed on approximately 90 – 100% of Android devices in the UK between January 2022 and February 2024. MBCG MI, paragraph 8.209.
[219] As explained in Appendix C, under Placement Agreements (PAs), Google pays OEMs 'activation payments' for each device on which the OEM fulfils obligations related to the pre-loading and placing of Google Search and/or Chrome on the default home screen. Activation payments are higher if the OEM fulfils the obligations in relation to both Google Search and Chrome. Our analysis shows that OEMs that comply with the terms of the PAs in relation to both Google Search and Chrome (as opposed to Google Search only) would be able to secure sufficient payments to

browser engine. Similarly, most browsers on Android are Chromium-based, meaning that are based on Blink.[220] Accordingly, Blink has a 99% share of supply of browser engines used on Android devices.[221]

(c) Google's official documentation and marketing shows how Google products work seamlessly across devices and platforms in the Google Mobile Ecosystem. For example, Google's website states:

(i) In relation to Google Mobile Services, which includes the Play Store app for Android devices: 'Google Mobile Services (**GMS**) is a collection of Google applications [that] work together seamlessly to ensure that your device provides a great user experience right out of the box' and 'GMS […] delivers a holistic set of popular apps and cloud-based services';[222]

(ii) In relation to Google Account: '[y]our Google Account works across all Google products, providing a single sign-in experience on Android, iOS, and web, so you can move seamlessly between devices without needing to sign in again';[223]

(iii) In relation to App Integration: '[with] App Integration, apps can communicate and share data securely across devices, enabling a continuous user experience as you switch from your phone to tablet or PC'.[224]

4.113 Similarly, end-users receive and use the various services and digital content in an integrated manner; there is not a separate 'app ecosystem' and 'web ecosystem'. A consumer purchasing an Android mobile device from a third-party OEM or Google will typically obtain the device, the Android operating system, the Chrome browser using the Blink browser engine, and the Play Store app in order to obtain Native App Distribution services. As is recognised

recoup the per device licence fees paid under the EMADA. Indeed, Table C.1 in Appendix C shows that all five OEMs for which we received payments data (at least) recouped their EMADA fee through the payment received from Google under their PA. This suggests that these OEMs comply with the terms of the PA relating to both Google Search and Chrome. Further, some Revenue Sharing Agreements contain clauses requiring the OEM, in order to qualify for certain higher tiers of payments, to (i) place Chrome in the 'hotseat' of an Android mobile device; and (ii) set Chrome as the default browser. Further, as noted in paragraph C.26, EMADA includes requirements related to the pre-installation and placement of the Play Store.

[220] Chromium is the open-source Chrome browser code that includes the Blink engine and parts of the Chrome browser except for some of Google's proprietary features.

[221] Based on all Blink-based browser engines, including 'light-forks' of Blink.

[222] Android – Google Mobile Services.

[223] https://developers.google.com/identity.

[224] https://developers.google.com/android.

in the quotes from Google above, the different digital activities form part of a single integrated 'ecosystem'.

4.114 We recognise that the three digital activities are not *all* provided to *all* end-users (for example because not all end-users use the Chrome browser). We also recognise that most end-users are unlikely to make use of *all* of the digital activities *simultaneously* (which, if taken literally, would mean an end-user simultaneously using an Android device, browsing the internet and downloading a native app). However, those considerations do not detract from the fact that Google carries out the activities (ie it provides the services and digital content), and that users can (and many do) consume them, as an integrated package of complementary services and content.[225]

4.115 In relation to Google's submission that as a technical matter, it is incorrect to state that the four products can be deployed together because they cannot be technically integrated,[226] we consider that there is at least some technical complementarity between the activities and products within them because they all work on Android devices.

4.116 Taken together, the provision of these activities as an integrated package of complementary services and content fulfils the purpose of facilitating interactions between users and providers of digital content and services on Mobile Devices, in order to enable users to access, view and engage with such content and services on their Mobile Devices. As some of the evidence cited above notes, the integrated package provided by Google (and consumed by users) encompasses a wider range of integrated products and services than the three activities which we have identified, including in particular a range of pre-installed first party apps such as Gmail, Google Maps, Google Photos, Google Drive, Google Calendar, Google Clock and calculator. However, our regulatory focus does not extend to that wider range of products, and it would not be appropriate to encompass them within the designation. Instead, we have focused on the use of a subset of Google's products for what we consider to be a precise and clearly defined purpose in the context of its broader Mobile Ecosystem.

[225] As Which? put it, it is only by using all of the digital activities in combination that users can make full use of their devices, Which?'s response to Proposed Decision, page 1. Similarly, Mozilla explained that while in theory, one could access content or services only through browsers, or only through native apps, in practice the vast majority of users use both; they are used in combination, Mozilla's response to Proposed Decision, page 3.
[226] Google's response to Proposed Decision, paragraph 109(d).

4.117 Whilst it might be possible to identify a narrower subset of products with a different purpose, for example by treating 'browsing the internet' and 'app distribution' as distinct purposes, we have exercised our regulatory judgement as to what is an appropriate purpose for this investigation. There are differences between accessing content and services through a browser, as opposed to by downloading an app, but there are also many similarities, and indeed in many situations end-users and providers have a choice over which route to use (with a large number of providers making their content and services available through apps *and* websites).

4.118 Submissions from other stakeholders were supportive of our grouping proposal overall and emphasised the appropriateness of grouping given the close interlinkages and seamless integration between the elements of the Mobile Platform in fulfilling the purpose of connecting users and content providers.[227]

4.119 In addition, we understand that the interlinkages between these digital activities are likely to remain in place and potentially become a more important characteristic of Google's Mobile Ecosystem over the forward-looking assessment period of the next five years. We received third-party submissions that technological developments such as AI and connected devices are likely to enhance the importance of integration for competition in Mobile Ecosystems and for how users and developers interact with Mobile Devices.[228].

4.120 Some third parties contended that there are different competitive dynamics between each individual digital activity which makes grouping of them inappropriate.[229] A third party also raised a concern that the conditions for 'clustering' products for the purposes of analysing competition in a particular market do not appear to have been met.[230] As explained above, the assessment of the relevant digital activities under section 3(3) is different in nature from a formal market definition exercise.[231]

4.121 In relation to the concern that grouping may obscure important differences in competitive dynamics between the individual digital activities, we note that

[227] Responses to the Proposed Decision from The Coalition for App Fairness, page 1; [✂] an anonymous party, page 2; Epic Games, page 4; Innovate Finance, page 1; [✂]; [✂]; Mozilla, pages 2–4; and Which?, page 1.
[228] See Chapter 8 and Mozilla's response to Proposed Decision, page 6.
[229] Information Technology & Innovation Foundation's response to Proposed Decision, pages 1–2; [✂] Anonymous financial services firm's response to Proposed Decision, pages 6–7.
[230] Information Technology & Innovation Foundation's response to Proposed Decision, pages 1–2.
[231] As noted in 'Legal framework and approach' above and in the CMA's Guidance, the CMA's approach to identifying digital activities is distinct from a formal market definition exercise and the CMA is not required to define a relevant market when assessing SMS.

grouping does not restrict the CMA's ability to consider those differences in the competitive assessment. It is important to consider the competitive dynamics affecting the Mobile Platform as a whole as well as its constituent elements: this is how we have approached our assessment of SEMP later in this report.

4.122 Grouping Google's digital activities also reflects how competition between Mobile Platforms works in reality. As explained later in this report, Google's Mobile Platform comprises interconnected components and in order to compete effectively with Google's Mobile Platform, a rival would need to be able to provide a version of each of these components, configured to work together. If there were to be unexpected market developments during the forward-looking period which affected particular elements of the Mobile Platform, the CMA would work with Google and the industry to ensure that the grouped digital activity remained appropriate as the basis for designating and regulating Google.[232]

Consistency with the underlying purpose of the digital markets competition regime

4.123 Under section 3(3) of the Act, where two or more activities within subsection (1) can be carried out in combination with each other to fulfil a specific purpose, the CMA may (but is not obliged to) treat them as a single digital activity.

4.124 Treating the activities as a single digital activity means that the CMA's assessment of the next statutory steps, namely whether Google has substantial and entrenched market power and whether it has a position of strategic significance, is directed at that single activity (the provision of a Mobile Platform). This is important because it reflects the reality that the three activities are provided (and consumed) in an integrated and overlapping way.

4.125 Additionally, we consider that treating the three activities as a single digital activity will have benefits when the CMA considers potential conduct requirements, insofar as these might pursue an overarching goal of promoting greater competition such that UK app developers and innovators developing and distributing content via Google's Mobile Platform are able to innovate and grow their businesses. Given the integrated nature of the activities, it is likely

[232] The Act gives the CMA the power to give a revised version of its SMS decision if it changes its view of the undertaking or the digital activity, provided that the undertaking or digital activity, as the case may be, remains substantially the same (section 15(4)), as well as the power to commence a new SMS investigation and revoke the existing designation at any time during the designation period relating to that designation (sections 10 and 16 of the Act).

that some potential conduct requirements may relate to Google's ability to use its substantial and entrenched market power across the Mobile Platform and/or relate to more than one of the three digital activities.[233]

4.126 Given the forward-looking nature of the regime, grouping the digital activities also ensures that the designation is sufficiently flexible and future-proof to account for future technological advances affecting more than one aspect of Google's Mobile Platform or where there may be different permutations of how the digital activities are provided and consumed in the future, eg AI tools. There is no risk of 'over-regulation' because the grouped activity is no wider than the sum of its constituent parts. In practice, this means that if Google starts to provide a new digital activity which does not fall within the specific descriptions of the single digital activities under section 3(1) of the Act as set out in this decision, such a new activity will not fall within the description of the grouped digital activity.

4.127 For these reasons we treat the three activities as a single digital activity: the provision of a Mobile Platform.

Potential grouping under section 3(3)(a) of the Act

4.128 In the Proposed Decision, we explained that given our provisional conclusion that the relevant digital activities can and should be grouped as a single Mobile Platform digital activity under section 3(3)(b), it was not necessary to determine whether the activities also have substantially the same or similar purposes under section 3(3)(a). However, we went on to indicate that the available evidence suggested that the activities could have substantially the same or similar purposes. Google disagreed with this assessment.

4.129 In light of our decision to group the digital activities under section 3(3)(b), we do not need to decide whether it may be possible and appropriate to use our power under section 3(3)(a) of the Act.

[233] We note that one third party [✂] raised concerns that grouping could limit the CMA's ability to design targeted and proportionate remedies and have an impact on innovation and security. Anonymous financial services firm's response to Proposed Decision, pages 5-6. It submitted that disaggregating the activities may allow for more nuanced and effective interventions. We consider the opposite to be true because conduct requirements do not have to relate to the Mobile Platform activity in its entirety but can focus on particular aspects where we have identified competition concerns which we have prioritised to investigate.

Conclusion

4.130 Our conclusion is that the three digital activities which we have identified (the Mobile Operating System, Native App Distribution, and Mobile Browser and Browser Engine) can be carried out in combination with each other to fulfil a specific purpose, namely facilitating interactions between users and providers of digital content and services (as applicable) on Mobile Devices in order to enable users to access, view and engage with such content and services on their Mobile Devices. We refer to that single activity as the provision of a Mobile Platform.

4.131 We therefore conclude that (i) the legal conditions for grouping Google's three digital activities into a single activity are met under section 3(3)(b); and (ii) exercising the power to group Google's activities in this case is consistent with the underlying purpose of the digital markets competition regime.

The digital activity is linked to the UK

This section considers whether Google's provision of the digital activity is 'linked to the UK'. We conclude that each of the conditions in the Act (any one of which would suffice) is satisfied and therefore that Google's provision of its Mobile Platform is linked to the UK.

4.132 The CMA may designate an undertaking as having SMS in respect of a digital activity carried out by the undertaking where the CMA considers that the digital activity is 'linked to the UK'.[234]

4.133 A digital activity is linked to the UK if:

(a) the digital activity has a significant number of UK users;[235]

(b) the undertaking that carries out the digital activity carries on business in the UK in relation to the digital activity; or

[234] Section 2(1)(a) of the Act.
[235] There is no quantitative threshold for how many UK users can be considered 'significant': the CMA's assessment may consider the firm's absolute position and/or the number of UK users it has relative to other undertakings (CMA194, paragraph 2.22).

(c) the digital activity or the way in which the undertaking carries on the digital activity is likely to have an immediate, substantial and foreseeable effect on trade in the UK.[236]

4.134 Based on the evidence we have obtained, we consider that each of the conditions in the Act (any one of which would suffice) is satisfied and therefore that Google's provision of its Mobile Platform is linked to the UK. As set out below, this is the case across the component parts of its Mobile Platform - namely, its Mobile Operating System, Native App Distribution and Mobile Browser and Browser Engine – and so for the Mobile Platform as a whole.

Mobile Operating System

4.135 Google's Mobile Operating System (Android) has a significant number of UK users:

(a) In 2024, there were [30 – 40] [✂] active Android smartphone Mobile Devices and [5 – 10] [✂] Android tablet devices in the UK.[237] This is a very significant number of users in the UK, particularly in the context of a UK population of 69 million.[238]

(b) Google has consistently been one of the largest suppliers of operating systems for both smartphones and tablets in the UK for almost a decade. In each year from 2015 to 2024, [✂] [40 – 50]% of active smartphones were Android devices.[239] In each year from 2017 to 2024, [✂] [20 – 30]% of active tablets were Android tablets.[240]

4.136 Google carries on business in the UK in relation to the provision of a Mobile Operating System:

(a) Google supplies smartphones and tablets – which incorporate its operating system – in the UK. In 2024, in the EMEA region, Google generated $[0 –

[236] Section 4 of the Act.
[237] Google's response to the CMA's section 69 notice [✂].
[238] According to estimates reported by Worldometer, in 2024, the UK population was around 69 million.
[239] The CMA has measured shares of supply on the basis of active devices. CMA analysis of data from market participants. In particular: Apple's response to section 69 notice [✂]; Google's response to section 69 notice [✂]; Huawei's response to section 69 notice [✂]. More detail on shares of supply is set out in Appendix A.
[240] The CMA has measured shares of supply on the basis of active devices. CMA analysis of data from market participants. In particular: Apple's response to section 69 notice [✂]. Google's response to section 69 notice [✂]. Amazon's response to section 69 notice [✂]. Huawei's response to section 69 notice [✂]. More detail on shares of supply is set out in Appendix A.

5] [✂] billion from sales of its own Android smartphones and $[0 – 20 million] [✂] from sales of its own Android tablets.[241]

(b) Google licenses its Android operating system in the UK to third-party device manufacturers.

4.137 As the provider of one of the main mobile operating systems in the UK, being used on [40 – 50] [✂]% of active smartphones in the UK in each year from 2015 to 2024, and [20 – 30] [✂]% of active tablets in each year from 2017 to 2024,[242] the effect on trade in the UK of Google's provision of its Mobile Operating System is likely to be immediate, substantial and foreseeable.

Native App Distribution

4.138 Google's Native App Distribution has a significant number of UK users:

(a) Under the terms of Google's agreements with OEMs, all approved Android smartphones and tablets have the Google Play Store pre-installed and placed prominently at device set-up.[243]

(b) In 2024, Google's Play Store had a [✂] [90 – 100] % share of supply for first-time native app downloads within Google's Mobile Ecosystem in the UK.[244]

(c) The Play Store has a significant number of first-time downloads and active users in the UK. In the UK in 2024, the Play Store had [✂] [1.5 – 2] billion first-time downloads of native apps[245] and an average of [✂] [2 – 3] million daily active users.[246,247]

[241] Google's response to section 69 notice [✂]
[242] The CMA has measured shares of supply on the basis of active devices. CMA analysis of data from market participants. In particular: Apple's response to section 69 notice [✂]; Google's response to section 69 notice [✂]; Amazon's response to section 69 notice [✂]; Huawei's response to section 69 notice [✂]. More detail on share of supply is set out in Appendix A.
[243] See Appendix C for further detail on Google's agreements with OEMs.
[244] The CMA has measured shares of supply on the basis of first-time native app downloads on Android devices. Analysis of data from market participants based on Google's response to section 69 notice [✂]. Samsung's response to section 69 notice [✂]; Xiaomi's response to section 69 notice [✂]; Oppo's response to section 69 notice [✂]; Aptoide's response to section 69 notice [✂]. See Appendix A.
[245] Google's response to section 69 notice [✂].
[246] Daily active users means the number of users that downloaded a native app from the Play Store each day.
[247] See Appendix A and Google's response to section 69 notice [✂].

(d) The Play Store hosts a significant number of app developers, who conduct their business by providing a wide range of apps to users. For example, the monthly average number of app developers on the Play Store in 2024 in the UK was [✂] [0 – 1] million and the monthly average number of native apps listed was [✂] [2 – 3] million.[248]

4.139 Google carries on business in the UK in relation to Native App Distribution: In 2024, the value of customer billings and net revenues on the UK Play Store were £[✂] [0 – 5] billion and £[✂] [0 – 2] billion respectively.[249,250]

4.140 Given the volume and financial value of transactions it supports, Google's provision of Native App Distribution is likely to have an immediate, substantial and foreseeable effect on trade in the UK.

Mobile Browser and Browser Engine

4.141 Google's Chrome Browser and Blink Browser Engine have a significant number of UK users:

(a) In June 2025, Chrome had a 80% share of supply of browsers within Google's Mobile Ecosystem in the UK, and in 2024 Chrome had a share of supply of 46% across all Mobile Devices in the UK.[251]

(b) Chrome has a high number of active monthly users with [✂] [40 – 50] million active monthly UK users on Android in December 2024.[252]

(c) In June 2025, Blink had a share of supply of at least 99% for browser engines used within Google's Mobile Ecosystem in the UK.[253]

4.142 Google carries on business in the UK in relation to the provision of its Mobile Browser and Browser Engine as it supplies Chrome and Blink in the UK.

[248] Google's response to section 69 notice [✂].
[249] Customer billings means the value of user spend in third-party apps processed by Google Play's billing system and net revenue means the value of customer billings retained by Google via its billing system.
[250] See Appendix A and Google's response to section 69 notice [✂].
[251] CMA analysis of publicly available Cloudflare data. For more detail on Android browser shares see Appendix A. For more detail on browser shares across all smartphones see Appendix A.
[252] Google's response to section 69 notice [✂]. Monthly active users is measured by Google as a snapshot of unique active users over the past 28 days on the first day of each month between January 2022 and December 2024.
[253] CMA analysis of publicly available Cloudflare data. For more detail on Android browser shares see Appendix A.

4.143 As the provider of one of the two main Mobile Browsers and Browser Engines in the UK for Mobile Devices and the main one used in Android Mobile Devices, the effect on trade in the UK of Google's provision of a Mobile Browser and Browser Engine is likely to be immediate, substantial and foreseeable.

5. THE SMS CONDITIONS: OVERVIEW

In this chapter we provide an overview of the substantive conditions set out in the Act for determining whether an undertaking has SMS – substantial and entrenched market power (**SEMP**) and a position of strategic significance (**POSS**) – and we explain the approach we have taken to our assessment as to whether Google meets these conditions in respect of its Mobile Platform.

Google's Mobile Platform operates in ways that interact and mutually reinforce one another: for Google, for device manufacturers, and for content providers and end-users. As Google itself has said, it makes sense for it to invest in Android, and supply it on an open-source basis to device manufacturers because that gives it the opportunity to put apps in front of consumers which may generate revenue, most often although not exclusively through advertising – notably Google Search, as the CMA's search SMS investigation shows.[254] For content providers, Google's Mobile Platform provides the infrastructure through which to offer their services to large numbers of consumers, and consumers in turn get access to all the content that is made available to them.

In seeking to assess Google's position, we have had to consider competitive forces at a somewhat disaggregated level, thinking about different groups of users and different digital activities. But when judging the existence or otherwise of substantial and entrenched market power, it only makes sense to carry out the assessment in the round; focusing unduly on one aspect would miss the bigger, interconnected picture. Considering the picture in the round reflects the commercial realities of what Google is trying to do in the market; the very same realities which also underlie our decision to 'group' Google's various digital activities into the Mobile Platform.

Our assessment considers: (i) the competitive constraints on Google's Mobile Platform from rival Mobile Ecosystems (as set out in chapter 6); (ii) competitive constraints on Google's mobile content provision and distribution from alternatives within its Mobile Ecosystem, as well as non-mobile alternatives (chapter 7); and (iii) the final elements of our SEMP analysis as well as our POSS assessment (chapter 8).

As set out in chapter 8, we conclude that Google meets both SMS conditions in respect of its Mobile Platform. For the avoidance of doubt, the evidence set out in this report also supports the conclusion that Google would meet both SMS conditions in respect of each of the core components of the Mobile Platform as set out in chapter 4.

[254] See SMS investigation into Google's general search and search advertising services - GOV.UK

The framework for our assessment

5.1 The CMA may designate an undertaking as having SMS in respect of a digital activity carried out by the undertaking where the CMA considers that the undertaking meets the SMS conditions in respect of the digital activity. The SMS conditions are that the undertaking has substantial and entrenched market power and a position of strategic significance in respect of the digital activity.[255]

Substantial and entrenched market power

5.2 The first SMS condition requires an assessment of a firm's market power. This is largely an assessment of the available alternatives and the extent to which they provide a competitive constraint on the firm's product or service. This includes alternatives available in the present and possibilities for entry and expansion.

5.3 Where a firm operates a two-sided (or multi-sided) platform serving distinct but related customer groups (such as content providers and end-users), we will generally consider both customer groups and the alternatives available to each; and the interlinkages between the sides of the platform, including the role of network effects.[256]

5.4 To assess whether an undertaking has substantial and entrenched market power in respect of a digital activity, [257] the CMA must also carry out a forward-looking assessment of a period of at least five years, taking into account developments that:[258]

(a) Would be expected or foreseeable if the CMA did not designate the undertaking as having SMS in respect of the digital activity; and

(b) may affect the undertaking's conduct in carrying out the digital activity.

5.5 Our Guidance explains the approach we will take and the types of evidence we may draw upon in assessing the first SMS condition.[259] In particular:

[255] Section 2(2) of the Act.
[256] CMA194, paragraph 2.52.
[257] Paragraph 109 of the Explanatory Notes explain in respect of the legal test under section 5 that: '(t)he underlying policy intent is that the CMA should be satisfied that the undertaking's power and influence in the digital activity is neither small nor transient, based on their consideration of competitive conditions.'
[258] Section 5 of the Act.
[259] CMA194, paragraphs 2.50-2.65.

(a) While ‘substantial’ refers to the extent of market power and ‘entrenched’ is intended to ensure a firm is not designated where its market power is only transient, our assessment of each element will typically draw on a common set of evidence.[260]

(b) Where the CMA ‘groups’ two or more of the firm’s digital activities into a single digital activity, the SMS assessment will relate to the grouped activity as a whole. In practice, we may consider evidence relevant to market power of individual products and whether and how any interlinkages between these may contribute to market power across the digital activity, for example whether the firm’s position in one activity in the group reinforces its position in another.[261]

‘Substantial’ market power

5.6 Market power arises where a firm faces limited competitive pressure and individual consumers and businesses have limited alternatives to its product or service, or even if they have good ones, they face barriers to shopping around and switching. It is often thought of as the power to price above competitive levels, but it can also relate to the extent to which a firm faces competitive pressures to raise quality and innovate.[262]

5.7 Market power is ‘substantial’ when a firm does not face strong competitive constraints in respect of the digital activity.[263]

5.8 Google submitted that the substantial market power condition sets out a higher standard than the traditional 'dominance' under Chapter II of the Competition Act 1998 and that its narrow scope, more intrusive interventions and ex ante nature all support a higher bar than ‘dominance’. Google cited the Explanatory Notes to the Act which it said supported a view that a firm must meet a ‘dominance plus’ standard before it can be said to hold substantial market power under the Act.[264]

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[260] CMA194, paragraph 2.54.
[261] CMA194, paragraph 2.65. See also paragraph 2.16.
[262] CMA194, paragraph 2.51 and footnote 43.
[263] CMA194, paragraph 2.55.
[264] Submission from Google, [✂]. In this regard, Google referred to the following statement in the Explanatory Notes: ‘(I)t is the Government’s view that the unprecedented market power, in relation to certain digital activities, of a small number of businesses, is holding back innovation and growth.’ We note that this statement reflects that the government’s policy intent in proposing the new digital markets statutory regime under the Act was informed by the unprecedented market power held by a number of firms in respect of certain digital activities across the markets. This statement does not concern the extent of market power held by a specific candidate SMS firm which is required to be

5.9 While the evidence set out in the analysis that follows could be relevant to establishing dominance under the Competition Act 1998, we do not consider that drawing this analogy is helpful. The Act creates a new legal regime with a separate framework and purpose from the Competition Act 1998. It does not refer to dominance but instead, as set out above in the 'Context to this investigation' section, adopts the test of 'substantial and entrenched market power'.[265] The frame of reference for that test is not a product and geographic market, established by a process of market definition, but instead the more flexible concept of a 'digital activity'.[266]

5.10 As explained above, Google's Mobile Platform comprises three individual digital activities, each of which encompasses a number of products, functionalities, 'layers' (in the case of the Mobile Operating System) or services. While, in principle, Google may face stronger competitive constraints in relation to some of those products, functionalities, layers or services than in relation to others,[267] the question we have to answer is whether Google has substantial and entrenched market power in respect of the digital activity of its Mobile Platform.

5.11 This is the legal test that we have applied to the evidence. As our Guidance explains, this entails a case-specific assessment and there is no exhaustive list of factors that must be present for a firm to have substantial market power.[268] Relevant evidence may include indicators such as the level and stability of shares of supply, the number and strength of competitive constraints to incumbent firms, profitability levels and levels of customer switching. The sources of market power may include supply-side factors (eg network effects, economies of scale and scope, integration into wider ecosystems) and demand-side factors (eg switching costs, behavioural biases, and the role of brand and reputation).[269]

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shown in order to establish that that firm holds substantial and entrenched market power. As noted in Chapter 2, in relation to establishing whether a firm has substantial and entrenched market power, the Explanatory Notes state that the CMA should be satisfied that the undertaking's power and influence in the digital activity is neither small nor transient (paragraph 109).

[265] Unlike other regimes: for example, the Communications Act 2003, which provides expressly that 'significant market power' is to be construed in the same way as the concept of dominance under the Competition Act 1998: section 78.

[266] CMA194, paragraphs 2.63-2.64. See also Explanatory Notes to the Act, paragraph 109: section 5 of the Act 'does not require the CMA to undertake a formal market definition exercise as part of an SMS investigation'.

[267] By way of example, the Android AI Core provides app developers with access to Google's on-device foundation models. However, if so inclined, app developers can instead use their own or a third party's foundation model and run them on the device. It is not necessary for Google to have substantial and entrenched market power in respect of foundation models for the Android AI Core to form part of the relevant digital activity (here, the Mobile Platform).

[268] CMA194, paragraph 2.55.

[269] CMA194, paragraph 2.53.

'Entrenched' market power

5.12 Our Guidance explains that when carrying out that forward-looking assessment, we will consider developments that may affect the firm's market power, including: (i) market developments such as emerging technology, innovation and new entrants; and (ii) regulatory developments.[270]

5.13 We will not seek to make precise predictions about the likely development of the industry. Instead, we will consider whether relevant developments are likely to be sufficient in scope, timeliness and impact to eliminate the firm's substantial market power.[271] Where the CMA has found evidence that the firm has substantial market power at the time of the SMS investigation, and where there is no clear and convincing evidence that relevant developments will be likely to dissipate the firm's market power, this will generally be supportive of a finding that market power is entrenched.[272]

5.14 With any ex ante assessment, there will necessarily be some uncertainty as to the future evolution of a sector. However, such uncertainty does not preclude the CMA from finding substantial and entrenched market power based on the evidence available to it when making its assessment.[273] We have assessed the evidence on the balance of probabilities, and with no presumption one way or the other.

5.15 Google submitted that: (i) the CMA cannot purely rely on past events or significant market power as at the moment of designation to establish a finding that the firm's market power is entrenched; (ii) it is not sufficient to simply review the previous five years and presume that the next five years will be the same;[274] (iii) any assessment of market power must take account of emerging changes or trends in consumer demand; technological shifts; business model changes and recent forthcoming or expected entry; indications of entrenched market power are that prices will be consistently higher and quality, investment and innovation will be persistently lower as compared to market outcomes in conditions of normal competition;[275] and that (iv) it follows that a firm with a

[270] CMA194, paragraph 2.59.
[271] CMA194, paragraph 2.60.
[272] CMA194, paragraph 2.62.
[273] CMA194, paragraph 2.58.
[274] Submission from Google [✂].
[275] Submission from Google [✂].

share of 40% that is falling, like Play, cannot be said to have entrenched market power.[276]

5.16 As explained in our Guidance, our assessment of whether market power is entrenched starts with market conditions and market power as of now, and considers expected and foreseeable developments over the designation period, as required by the Act. [277] We consider what the sources of Google's market power have been, whether these are likely to remain in the future, and whether Google's market power has endured through previous market developments.[278]

5.17 In the sections that follow we set out the evidence we have obtained in this investigation in relation to the SMS conditions and the conclusions we draw from it. In response to our Proposed Decision, Google disputed the probative value, and our assessment, of individual aspects of that evidence base.[279] Whilst in arriving at our decisions we have carefully considered Google's submissions on each of these aspects of the evidence base, our findings are based on the totality of the evidence, taken in the round and applying the balance of probabilities.[280]

Position of Strategic Significance

5.18 An undertaking has a position of strategic significance in respect of a digital activity where one or more of the following conditions is met:[281]

(a) The undertaking has achieved a position of significant size or scale in respect of the digital activity;[282]

(b) a significant number of other undertakings use the digital activity as carried out by the undertaking in carrying on their business;[283]

[276] Submission from Google [✂], and submission from Google [✂].
[277] CMA194, paragraphs 2.60-2.62.
[278] CMA194, paragraph 2.61.
[279] For example, see Google's Response to Proposed Decision and [✂].
[280] CMA194, paragraph 2.80.
[281] Section 6 of the Act.
[282] A position of significant size could refer to the number of users in relation to the relevant digital activity. A position of significant size or scale may also depend on the undertaking's size relative to the digital activity. There is no quantitative threshold for when size or scale can be considered 'significant'. Explanatory Notes to the Act, paragraph 114. See also CMA194, paragraph 2.70.
[283] Our Guidance explains that this condition can be assessed, for example, by reference to the number of businesses, products and services 'hosted' on the firm's platform, and/or the proportion of other firms' sales it facilitates. See CMA194, paragraphs 2.68-2.70. See also Explanatory Notes to the Act, paragraph 114.

(c) the undertaking's position in respect of the digital activity would allow it to extend its market power to a range of other activities; and

(d) the undertaking's position in respect of the digital activity allows it to determine or substantially influence the ways in which other undertakings conduct themselves, in respect of the digital activity or otherwise.

5.19 Our Guidance provides further details as to how the CMA will assess each condition.[284]

Our assessment approach

5.20 Our analysis of the SMS conditions has three parts.

(a) Chapter 6 considers SEMP and **competitive constraints on Google's Mobile Platform from rival Mobile Ecosystems.** We consider the competitive constraints in relation to each group: OEMs who are licensed to distribute the platform; end-users; and content providers who use each side of the platform. We also consider the impact of revenue sharing arrangements between Apple and Google as well as barriers to entry and expansion for Mobile Ecosystems and the extent to which Google faces a competitive constraint from the threat of a new Mobile Ecosystem emerging.

(b) Chapter 7 focuses on SEMP and **competitive constraints on Google's mobile content provision and distribution** from alternatives **within its Mobile Ecosystem** as well as **non-mobile alternatives**.

(c) Chapter 8 sets out the final elements of our SEMP analysis: a profitability analysis, and our assessment of competition to Google's Mobile Platform arising from wider technological and market, regulatory and other developments. We also present our assessment of whether Google has a position of strategic significance. Finally, we **conclude on whether Google's Mobile Platform meets both SMS conditions**.

5.21 We consider forward-looking developments as part of our assessment in Chapters 6 and 7, as relevant. In Chapter 8, we then set out our assessment of wider technological and market, regulatory and other developments together

[284] CMA194, paragraphs 2.68 to 2.75.

with our conclusions on all the evidence relating to forward-looking developments in the round.

5.22 As set out in the summary box at the start of this chapter, whilst we have considered competitive constraints across different groups of users and digital activities, we take all of these into account in coming to our overall assessment of substantial and entrenched market power.

6. SEMP: CONSTRAINTS ON GOOGLE'S MOBILE PLATFORM FROM RIVAL MOBILE ECOSYSTEMS

This chapter considers the extent of competitive constraints on Google's Mobile Platform from rival Mobile Ecosystems.

- We consider the distribution of Google's Mobile Platform through the licensing arrangements with OEMs and find that Google is the only provider of a licensable operating system and **Google's Mobile Platform therefore faces no effective constraint from rival Mobile Platforms to supply OEMs**.

We then consider the strength of competitive constraint from the perspective of users on both sides of the platform.

- In relation to **the availability of alternatives to Google's Mobile Platform for end-users**, we find that Google's Mobile Platform holds a share of [40-50]% of device sales in the UK, with its only major rival, Apple's Mobile Platform, holding a share of [50-60]%. Google's share is highest among mid and lower priced devices: 61% of smartphones between £300-£600 and 100% of smartphones below £300. Apple differentiates its Mobile Ecosystem from Google's and, as a result, end-users do not perceive the two ecosystems to be close substitutes. The strength of competitive constraint for end-users varies in different price segments. Apple provides a greater competitive constraint in relation to premium users with smartphones priced over £600 relative to non-premium users, but premium users represent less than a quarter (23%) of Google's UK mobile users. End-users considering switching are likely to be among the most contested by Google and Apple but this group is a minority. The vast majority of users do not consider switching at all and there are both actual and perceived barriers to switching, for example concerns about loss of data (such as photos) when moving between platforms. Taking all of the evidence in the round, our conclusion is that **Google faces a limited constraint from rival Mobile Ecosystems in competing for end-users overall.**

- In relation to **competition to attract content providers to Google's Mobile Platform**, Android is a must-have platform, as it is the only means of accessing the large group ([40-50]%) of mobile users in the UK with an Android device. Even with some limited competition for end-users as set out above, the extent of this end-user base has remained persistently large over time. Overall, we conclude that **Google's Mobile Platform faces very limited constraint from rival Mobile Ecosystems in competing for content providers.**

The revenue sharing agreement between Google and Apple further limits their incentive to compete with each other as the arrangement is of high strategic and financial importance to both.

Furthermore, the extent of the competitive constraint from any Mobile Platforms beyond Apple is very limited which is exacerbated by high barriers to entry and expansion. A rival mobile platform would need to attract a sufficient number of app developers to be attractive for consumers, as well as attract a sufficient number of end-users to make the platform attractive for app developers. These 'indirect network effects' are a particularly strong barrier which large companies including Microsoft, Samsung, Mozilla and Amazon have been unable to successfully overcome.

Bringing all these dimensions together to consider the strength of competitive constraint across Google's Mobile Platform as a whole, **we conclude that Google's Mobile Platform faces limited competitive constraint from rival Mobile Ecosystems.**

Competition for OEMs

Google produces its own Mobile Devices and also licences its Mobile Platform to be installed on Mobile Devices produced by third-party OEMs such as Samsung, Xiaomi and Oppo.[285]

This section assesses the extent to which Google's Mobile Platform is constrained by the threat of OEMs switching to license another Mobile Platform on the Mobile Devices they manufacture.

We conclude that Google is the only licensable Mobile Platform available and it therefore faces no effective constraint from the threat of OEMs switching to license a different mobile platform. This allows Google to control the use of its Mobile Platform and the placement and promotion of its broader services on Android Mobile Devices.

Role of third-party OEMs

6.1 Until 2016, Google did not manufacture its own Mobile Devices. Google established its position in mobile by developing the Google Mobile Platform and licensing it to multiple third-party mobile device manufacturers. This approach of 'partnering' with multiple OEMs helped Google to quickly spread the adoption of

[285] There are a series of agreements under which OEMs are allowed to use different elements of Google's Mobile Ecosystem. We provide more detail on these agreements in Appendix C.

its Google Mobile Platform and contributed to its success as Android was able to reach a critical mass of end-users and content providers.[286]

6.2 Google has manufactured its own Mobile Devices (Pixel devices) since 2016 but these only account for a small proportion of Android devices (in the UK in 2024 Pixel Mobile Devices accounted for [✂] [0 - 5]% of active Android devices)[287] and Google continues to use third-party OEMs to manufacture and distribute almost all Mobile Devices using its Google Mobile Platform. We understand that Google's motivation for launching its own Mobile Devices was in part linked to its relationship with third-party OEMs: Google submitted that one of its objectives for Pixel is [✂].[288]

6.3 Google's main source of revenue comes from selling digital advertising, primarily search advertising.[289] Mobile devices are a key gateway through which users search the internet. They generally have apps preinstalled that include search access points, such as browsers, search apps and widgets, and voice assistants. Google's Mobile Ecosystem supports its search business, as it facilitates the promotion of Google's products and services related to Google search or even allows for Google's search engine to be set or selected as the default search app or search engine within a mobile browser. Being the preset default general search engine is particularly valuable because consumers rarely change the preset default.[290]

6.4 The OEM plays a role in deciding how its Mobile Devices are set up (including which apps are preinstalled and the selection of defaults). However, OEMs can choose to enter into a series of agreements with Google if they wish to (i) license the Android name and logo from Google in order to use the Android brand operating system,[291] (ii) install the Play Store or at least one of Google's other first party apps and (iii) be eligible to receive payments from Google in return for fulfilling certain obligations.[292] These agreements are relatively complex and vary across OEMs and even across Mobile Devices for a given

[286] We explain the importance of indirect network effects within the 'Barriers to entry and expansion in Mobile Platforms' section below.
[287] CMA analysis based on Google's response to section 69 notice [✂].
[288] Google further specified that it '[✂]' Google's response to section 69 notice [✂].
[289] For more detail see Appendix B.
[290] For more detail see the CMA's Decision to designate Google as having SMS in general search services, User access and default positions section.
[291] OEMs must comply with the baseline compatibility requirements set out in the Compatibility Definition Document. See Appendix C for further detail.
[292] [✂] and 3 responses to section 69 notices: [✂].

OEM. We provide more detail on Google's agreements with OEMs in Appendix C.

6.5 While Google has limited involvement in the pricing and distribution of Android Mobile Devices[293], as set out in Chapter 4 we consider that competition substantially takes place for the bundled product of a Mobile Platform with the associated mobile device and, therefore, whilst our focus is on Google's Mobile Platform, we have considered the role of Android Mobile Devices as part of our assessment where appropriate.

Alternatives available to OEMs

6.6 There is no effective constraint on Google from the risk that OEMs will switch their mobile device manufacturing to support another Mobile Platform for the following reasons:

(a) Third-party OEMs have told us that **Android is the only established licensable mobile operating system** and that no licensable alternatives to Android are expected to emerge in the UK over the next five years.[294]

(b) As we explain in the 'Shares of supply' and 'Barriers to entry and expansion in Mobile Platforms' sections below, only the Mobile Platforms of Amazon and Huawei (in China) have gained a significant number of users. We also note that: (i) Amazon confirmed it has no plans to [✂];[295] and (ii) Huawei submitted that it is subject to constraints on its ability to compete in the UK [✂].[296]

(c) **We do not expect any new Mobile Platforms to emerge over the next five years due to there being high barriers to entry and expansion** as set out in the 'Barriers to entry and expansion in Mobile Platforms' section below. In particular, we note that OEMs are unlikely to switch to a new Mobile Platform provider as: (i) it is unlikely to offer the mobile content

[293] As set out above, Google's Pixel devices only account for a small proportion of Android devices.
[294] 8 responses to section 69 notices (including the largest Android OEMs); [✂].
[295] Amazon's response to section 69 notice [✂].
[296] As explained in paragraph 'Competition from non-Apple Mobile Platforms for end-users' section, US legislation from May 2019 meant that Huawei could no longer access Google's apps and services, including GMS. The last Huawei smartphone device model was sold in early 2023, and subsequently no new Huawei smartphone models have been available in the UK market. Huawei's response to section 69 notice [✂].

which end-users want;[297] (ii) OEMs would face significant financial[298] and resource/time[299] costs if they switched away; and (iii) the new provider would be unlikely to be able to replicate Google's payments.[300]

6.7 Conversely, Google has a range of different OEMs with which it can partner and the presence of Google's Pixel devices shows that it is also able to manufacture its own Mobile Devices.

6.8 In response to the Proposed Decision, Google submitted that there has been no degradation in quality or increase in price in relation to the licensing of Android to OEMs, and OEMs are therefore not suffering from adverse effects arising from a lack of competitive constraint on Android.[301] We recognise that Google has a strong incentive to maintain the quality of Android in order to facilitate the effective distribution of content through its Mobile Platform, as this is the primary way that it monetises its Mobile Platform. However, we find that Google is in a very strong position when entering into agreements with third-party OEMs. We have reviewed Google's contracts with the five largest Android OEMs in the UK and note that each of them had elected to enter all agreements offered by Google.[302]

6.9 We conclude that Google faces no effective constraint from the threat of OEMs switching to license a different mobile platform. This results in Google having strong bargaining power in its negotiations with OEMs, allowing it to control the use of its Mobile Platform and the placement and promotion of its broader services. This in turn strengthens the position of Google's Mobile Platform with respect to end-users and content-providers and as we discuss further below, raises barriers to entry and expansion for potential rivals who could provide a constraint on part or all of Google's Mobile Platform.

[297] We explain in the 'Barriers to entry and expansion in Mobile Platforms' section below that the provision of content is strongly influenced by indirect network effects.
[298] 3 responses to section 69 notices; [✂].
[299] 3 responses to section 69 notices; [✂].
[300] As described in more detail in Appendix C, the CMA estimates that in 2024 Google made net payments in respect of UK devices to each of the five largest Android OEMs in the UK in the range of £[0–50] million [✂] to £[100–200] million [✂]. CMA analysis of Google's response to section 69 notices; [✂]
[301] Google's response to Proposed Decision, paragraph 89.
[302] [✂]. According to CMA analysis of Statcounter data (Mobile Vendor Market Share United Kingdom | Statcounter Global Stats), these five OEMs accounted for around 75% of Android smartphones in 2024 [✂].

Competition for end-users

When an end-user purchases an Android mobile device from a third-party OEM or Google, it comes pre-loaded with Google's Mobile Operating System, Android, Google's Play Store, and typically with the Chrome browser using the Blink browser engine.[303] Each of the elements of Google's Mobile Platform is typically used by end-users to access content on their Mobile Devices.

This section assesses the extent to which Google's Mobile Platform faces competition for end-users from rival mobile ecosystems, focusing on the constraint from Apple as the evidence illustrates that Apple has consistently been the only sizeable competitor to Google's Mobile Platform. We find that Google's Mobile Platform faces only a limited constraint when competing for end-users overall.

- The main parameters of competition on which Google's Mobile Platform competes with Apple's for end-users are price, quality and brand.
- Google and Apple have held high and stable shares over a sustained period, with Apple's share of device sales [50-60]% and Google's [40-50]%. Other Mobile Ecosystems account for only a small share. Google's share is highest among mid and lower priced devices (61% of smartphones between £300-£600 and 100% smartphones below £300).
- Apple differentiates its Mobile Ecosystem from Google's and, as a result, end-users do not generally perceive the two ecosystems to be close substitutes.
- The level of competitive constraint varies across end-users in different price segments. Apple provides a greater competitive constraint in relation to premium users with smartphones priced over £600 relative to non-premium users, but premium users represent less than a quarter (23%) of all Google's UK mobile users.
- Those considering switching are likely to be among the most contested by Apple and Google but this group is a minority. The vast majority of users do not consider switching at all. There are both actual and perceived barriers to switching, for example concerns about loss of data (such as photos) when moving between Mobile Platforms.

[303] The pre-installation of the Google Play Store on Android mobile devices in discussed in more detail in Appendix C, and the Mobile Browsers Cloud Gaming Market Investigation found that Chrome was pre-installed on approximately 90 – 100% of Android devices in the UK between January 2022 and February 2024 (MBCG MI Final Decision Report, paragraph 8.209).

- We cannot robustly infer whether relatively high levels of innovation and customer satisfaction are driven by competition or other factors. Improvements in quality are consistent with Google's incentives to increase revenues from its existing user base.
- Other Mobile Ecosystems, such as Amazon, only provide a very limited constraint on Google's Mobile Platform.

Parameters of competition for end-users

Context

6.10 When choosing a mobile device, an end-user does not pick a mobile platform in isolation, but rather chooses a mobile ecosystem, considering the mobile device, the mobile platform and the content that can be accessed via that mobile platform.[304] As set out below, our representative consumer survey[305] results show that end-users purchasing a smartphone care about both hardware and software features across the wider mobile ecosystem. When assessing the competitive constraint on Google's Mobile Platform for end-users, it is therefore often necessary to consider the broader Mobile Ecosystem (especially the mobile device hardware), rather than only focus on the core software and digital content components that make up the Mobile Platform. This is reflected in our assessment.

6.11 As set out in Chapter 4, smartphones and tablets using Google's Mobile Platform differ slightly in terms of how they are consumed by users, mainly relating to certain differences in use case. We have assessed competition for end-users with this in mind and draw out below any differences in the evidence we have gathered for the two types of devices where relevant.

6.12 End-users generally do not have both an iOS and an Android device (most end-users single-home)[306] and the large majority of device purchases relate to replacement Mobile Devices, meaning that most end-users are already within

[304] Our assessment concentrates more on smartphones, due to the fact that smartphones account for around 80% of mobile devices in 2024 and because the evidence we have received (including Google's internal switching estimates and RFI responses) has focused predominantly on smartphones. We draw out differences for tablets where relevant.
[305] For this investigation we commissioned a survey of 2,851 UK smartphone users. See Consumer Survey report on SMS investigation into Google's mobile platform - GOV.UK. We refer to our consumer survey evidence throughout this report and consider certain issues related to the interpretation of the survey in Appendix D.
[306] MEMS final report, June 2022, paragraph 3.39 and 4.149. An Apple internal document [✂]. We note there is some evidence of a greater degree of multi-homing across smartphones and tablets (eg a user owning an Android smartphone and an iPad) and between work and personal smartphones (e.g. a user owning an Android personal smartphone and an iOS work phone) but this is still considered to be limited.

either Google's or Apple's Mobile Ecosystem. This is especially the case for smartphones in the UK where the market is mature and the vast majority of users purchase a replacement device.[307]

Key parameters

6.13 Evidence from our consumer survey shows that Google competes with Apple for end-users over the parameters of price, quality and brand.[308]

(a) Price**.** Our consumer survey showed that the price of the smartphone was an important factor in users' smartphone purchase decision, although there was a significant difference in its importance between Android and Apple users - 58% of all Android smartphone users mentioned 'overall price' as an important factor in their decision to purchase a new smartphone, with 30% considering it the most important factor. In contrast, only 33% of iOS users mentioned it as an important factor, with 10% considering it the most important factor.[309]

(b) Quality**.** End-users care about a number of factors related to the quality of mobile ecosystems, including:

(i) Hardware features. This includes factors such as the battery life, camera quality and screen size among others.[310] Our consumer survey results indicate that Android smartphone users are slightly more focused on specific hardware features than Apple users, whilst product design overall was more important to Apple users.[311]

[307] Our consumer survey found that for only 1% of users their current smartphone is their first smartphone. Accent Mobile Consumer Survey, page 27.
[308] The data presented here regards the factors users considered most important when they last got a new smartphone (in response to the question "Thinking back to when you first got your current personal smartphone. Which factors were MOST important at the time in your decision to get that particular personal smartphone?" Accent Mobile Consumer Survey, page 17).
[309] Accent Mobile Consumer Survey, Figure 9, Figure 13, Figure 12.
[310] For example, our consumer survey found that important factors when choosing a smartphone included the following: (i) 50% of iOS users and 53% of Android smartphone users selected 'camera'; (ii) 46% of iOS users and 56% of Android smartphone users selected 'battery life'; (iii) 41% of iOS users and 50% of Android smartphone users selected 'storage capacity/memory'; and (iv) 36% of iOS users and 43% of Android smartphone users selected 'screen size'. Accent Mobile Consumer Survey, Figure 9.
[311] For example, in relation to hardware features: (i) 46% of iOS users and 56% of Android smartphone users selected 'battery life'; (ii) 41% of iOS users and 50% of Android smartphone users selected 'storage capacity/memory'; and (iii) 36% of iOS users and 43% of Android smartphone users selected 'screen size'. 'Product design' was selected by 32% of iOS users and 23% of Android smartphone users as important in their smartphone purchase decision. Accent Mobile Consumer Survey, Figure 9.

(ii) Operating system and software features. Our consumer survey found that 35% of iOS users and 37% of Android smartphone users selected the operating system as an important factor in their smartphone purchase decision.[312] More Apple users selected security and privacy features as being important.[313]

(iii) Content available on their devices. Generally, mobile ecosystems that allow end-users to access more and better-quality content, whether via native apps or mobile browsers, will be more attractive to end-users. This will primarily depend on the app store(s) available to end-users on that mobile device. Our consumer survey found that: (i) the range and quality of mobile apps that can be installed on the phone was cited as an important reason for purchasing their phone by 17% of iOS users and 15% of Android smartphone users; (ii) the availability of web browsers was cited by 10% of iOS users and 12% of Android smartphone users; and (iii) the range and quality of mobile apps that come with the phone was cited by 12% of iOS users and 8% of Android smartphone users.[314,315]

(iv) Interoperability. For many end-users, the ability of the mobile platform to interoperate with a range of other devices that they have (other Mobile Devices or 'connected' devices such as smart watches), is an important factor. In our consumer survey, 39% of iOS users and 20% of Android users selected 'compatibility with other personal devices' as an important reason for choosing their current phone.[316]

(c) Brand**.** For a large number of end-users, the brand of the Mobile Ecosystem, including the associated mobile operating system, is an important factor in their choice of mobile device. End-users' perceptions of each brand will be driven by a variety of factors including past user

[312] Accent Mobile Consumer Survey, Figure 9.
[313] Our consumer survey found 23% of iOS users and 16% of Android smartphone users selected 'security features' and 17% of iOS users and 11% of Android smartphone users selected 'privacy features' as an important factor in their smartphone purchase decision. Accent Mobile Consumer Survey, Figure 9.
[314] Accent Mobile Consumer Survey, Figure 9.
[315] As set out above, the factors that are important to a user choosing which smartphone to purchase are likely to be different to factors that are more generally important to users regarding their smartphone and the associated Mobile Ecosystem. The survey response proportions presented here are specific to the most important factors when choosing a smartphone. As we detail below, Apple's iOS and Google's Android are the only established smartphone Mobile Ecosystem options in the UK and users are primarily choosing between these two options. Both have established and extensive app stores. We note that users may find this factor more important if purchasers were instead considering potential rival Ecosystems with a more limited mobile content offering.
[316] Accent Mobile Consumer Survey, Figure 9.

experience, marketing and the parameters of competition outlined above. Our consumer survey found that 57% of iOS users and 45% of Android smartphone users selected brand as an important factor in their smartphone purchase decision, with 24% of iOS users and 12% of Android smartphone users selecting it as the most important factor.[317]

6.14 Evidence from Google and third parties is consistent with the parameters of competition identified above.

(a) Google submitted that: (i) its Android operating system competes on quality parameters, which can be measured as releases of new versions of Android, as well as innovations and features included in new versions; and (ii) its Pixel devices compete on both price and quality metrics (eg battery life, user interface, processing speed and security).[318] Google also submitted that brand factors into a user's choice of mobile device and noted that Apple has an 'exceptionally strong brand'.[319]

(b) Apple stated that Mobile Devices compete on a range of factors, with the price and quality of its Mobile Devices, as well as the appeal of its mobile operating systems, ultimately driving device sales.[320]

(c) [✂] submitted that providers of Mobile Devices compete across a range of factors, including price and quality.[321]

(d) Samsung submitted that the key dimensions of competition are pricing and quality factors, including the processor, screen, battery and camera.[322]

6.15 The above evidence shows that whilst some of the same factors are important to both Apple and Android users, there are some notable differences. In particular, brand and interoperability with other devices appear to be more important to Apple users, whilst price is more important to Android users. These differences are consistent with other evidence (for example on shares of supply) and relevant to the nature and closeness of competition between the two Mobile Platforms.

[317] Accent Mobile Consumer Survey, Figure 9, Figure 12, Figure 13.
[318] Google's response to section 69 notice [✂].
[319] Google's response to section 69 notice [✂].
[320] Apple's response to section 69 notice [✂].
[321] [✂] response to section 69 notice [✂].
[322] Samsung's response to section 69 notice [✂].

6.16 Google competes over many of these parameters of competition on a global basis, as Google's Mobile Platform is broadly the same worldwide.[323] For example, Google's incentives to innovate and improve the quality of its Mobile Platform are likely to be determined globally.[324] Indeed, new versions of Android have global release dates.[325] Google has also told us that Android competes with iOS on a global basis.[326]

Shares of supply

Overall shares of supply

6.17 In this section we set out the shares of supply in the UK based on the mobile ecosystem used by end-users.[327] We explain our methodology and the data we have used to calculate shares of supply in Appendix A, including analysis for smartphones and tablets separately.[328]

6.18 Google's Mobile Ecosystem has accounted for a persistently material and stable share of supply in each of the last eight years. As set out later in this report, evidence does not indicate that Google's shares of supply are likely to change significantly over the next five years.

6.19 Figure 6.1 shows that, based on the volume of active Mobile Devices in the UK, Google's and Apple's Mobile Ecosystems have been the two largest providers

[323] Google stated that it develops Android, Google Play, Blink and Chrome as global products and, accordingly, innovations and improvements for Android are designed to benefit users across the world. Google's response to section 69 notice [✂]. We note that there are some differences between Google's Mobile Platform between jurisdictions. For example, the apps offered on the Play Store vary between jurisdictions.
[324] Google stated that the features and functionalities of Android, Google Play, Blink and Chrome are not tailored specifically to the UK or any other individual country. Google's response to section 69 notice [✂].
[325] Endoflife.date, 'Android OS | endoflife.date', 20 September 2025, accessed by the CMA on 6 October 2025.
[326] Google's response to Proposed Decision, footnote 12.
[327] As set out in Chapter 4, a Mobile Ecosystem includes the Mobile Platform, the mobile devices themselves, and the digital content accessible via the platform. Google's Mobile Ecosystem is offered across both smartphones and tablets, and we consider users effectively make a choice as to which Mobile Ecosystem they use when purchasing a mobile device as that device will come pre-loaded with an operating system associated with a given ecosystem. Thus, the number of users of a given operating system equals the users of the corresponding Mobile Ecosystem. We explain our methodology and the data we have used to calculate shares of supply in Appendix A.
[328] In summary, this indicates that (i) for smartphones Google and Apple hold an effective duopoly in the UK. Smartphone suppliers using alternative Mobile Ecosystems have achieved negligible shares of supply (<1%). We find that the duopoly has remained stable with little change over a sustained period of time and this trend is consistent with a lack of effective competition; and (ii) for tablets, Google faces two competitors with non-negligible shares of supply (Apple and Amazon). Tablets using the Google Mobile Ecosystem have regularly had the second largest share of supply. We consider this is consistent with there being limited effective competition in tablets.

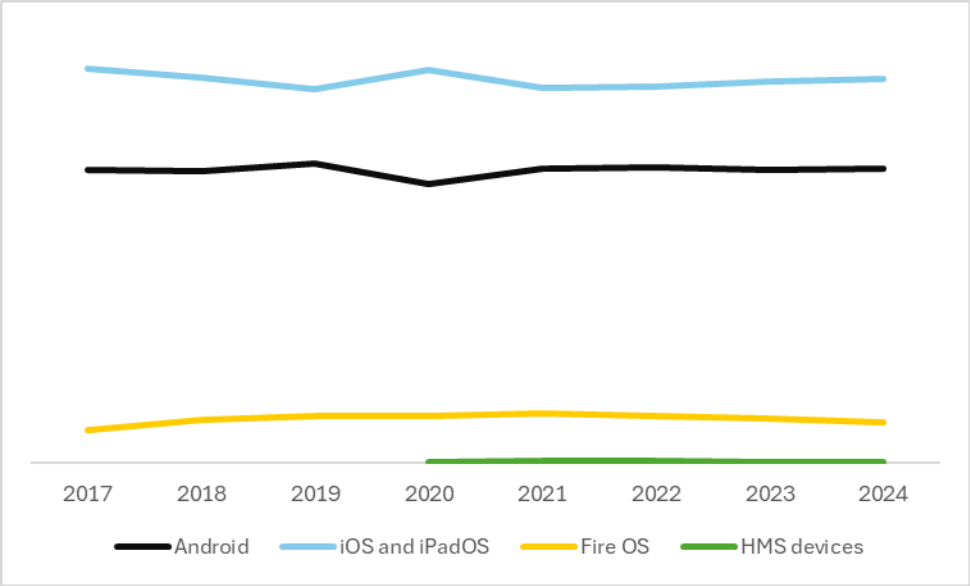
in terms of shares of supply in the UK in the period 2017 to 2024.[329] Specifically:

(a) Google's Mobile Ecosystem has accounted for between [✂] [30 – 40]% and [✂] [40 – 50]% of active Mobile Devices in each year;[330]

(b) Apple's Mobile Ecosystem has accounted for between [✂] [50 – 60]% of active Mobile Devices in each year;[331] and

(c) Amazon's Mobile Ecosystem has accounted for between [✂] [5 – 10]% of active Mobile Devices in each year.[332]

Figure 6.1: Mobile Ecosystem shares of supply based on volume of active smartphones and tablets in the UK (2017 – 2024)



Source: CMA analysis of data from market participants. Notes (i) For confidentiality purposes there is no y-axis on this graph. The lines plotted on the graph show the relative positions of market participants in terms of their shares of supply. (ii) HMS devices are devices that meet Google Android compatibility requirements but rely on Huawei's Huawei Mobile Services (instead of GMS). Huawei was only able to provide data from 2020.[333]

[329] The following shares have been calculated based on data from market participants. In particular: Apple's response to section 69 notice [✂] Google's response to section 69 notice [✂]. Amazon's response to section 69 notice [✂] Huawei's response to section 69 notice [✂].
[330] CMA analysis of data from market participants including Google's response to section 69 notice [✂].
[331] CMA analysis of data from market participants including Apple's response to section 69 notice [✂].
[332] CMA analysis of data from market participants including Amazon's response to section 69 notice [✂].
[333] MEMS final report, June 2022, page 30, paragraph 3.6.

6.20 There are Mobile Devices active in the UK using Mobile Ecosystems other than those of Google, Apple and Amazon, such as /e/, and CalyxOS. However, each account for a negligible number of active mobile device users. We have found that there is no operating system provider in active Mobile Devices beside Google, Apple and Amazon that has a share of supply of more than [✂] [0 – 5]% in any of the last five years,[334] and the data collected on Huawei's Huawei Mobile Services (**HMS**) devices indicates that it represented [✂] [0 – 5]% of active Mobile Devices since 2020.[335]

6.21 We note that the analysis above relates to the UK and, when viewed from a global perspective, Google provides the largest Mobile Ecosystem and accounts for a substantial share of active Mobile Devices (between 65% and 72% in each year since 2016).[336]

6.22 As set out in Chapter 8, we find the evidence does not indicate that Google's shares of supply are likely to change significantly over the next five years.

Shares of supply based on price segments

6.23 We are unaware of any standard, industry-wide definitions for whether, and if so, how the smartphone market is segmented. However, we note that it is commonplace for stakeholders to refer to different 'segments', 'price bands' or 'tiers of devices'. To support our assessment of the competitive dynamics across different price segments, we generally use the term premium to relate to smartphones sold for more than £600. We also consider the price segments of £300-600 and below £300 in more detail as appropriate.[337],[338]

6.24 As set out in Table 6.1, Apple holds a higher share of premium smartphones priced over £600, and Google holds a higher share of non-premium smartphones sold for less than £600. These differences are particularly pronounced when shares are viewed in more detail:

[334] CMA analysis based on data from market participants: Apple's response to section 69 notice dated [✂]. Google's response to section 69 notice [✂]. Huawei's response to section 69 notice [✂] and Statcounter data (see Mobile & Tablet Operating System Market Share United Kingdom | Statcounter Global Stats).
[335] Huawei was only able to provide this data from 2020 due to the availability of data in its database. CMA analysis of data from market participants based on Huawei's response to section 69 notice [✂].
[336] CMA analysis of data from Statcounter. See Appendix A section on 'Mobile ecosystems' for more detail.
[337] Several of Google's internal documents break the market down into different price segments and contain [✂] Google's internal documents; [✂].
[338] The lack of standard, industry-wide definitions means that it is not always clear which segment is being referred to by stakeholders. We have been mindful of this when assessing evidence.

(a) No new iOS smartphones were sold for £300 or less and smartphones using Google's Mobile Platform accounted for 100% of this category of new smartphone devices in 2024. Smartphones that sell for less than £300 account for 23% of all new smartphone sales in the UK in 2024.[339]

(b) Google's Mobile Platform also had a higher share of new smartphones that sold in the £300 to £600 range in 2024, accounting for 61% of all sales in this category. This category of smartphones accounted for 19% of all new UK smartphone sales in 2024.[340]

(c) iOS smartphones accounted for 82% of sales of new premium smartphones over £600 in 2024, whilst Android accounted for 18%. Devices priced at over £600 accounted for 58% of all new UK smartphone sales in 2024.[341]

Table 6.1: Mobile ecosystem and overall shares of supply by price segment based on volume of smartphones shipped into the UK – IDC data (2024)

Price Segment	*Android*	*iOS*	*All smartphones*
£0 - 300	100%	0%	23%
£300 - 600	61%	39%	19%
£600+	18%	82%	58%

Source: CMA analysis of IDC data from "IDC Worldwide Quarterly Mobile Phone Tracker, February 2025".
Notes: for the purposes of this analysis we have not split out Huawei's HMS devices from Android devices.

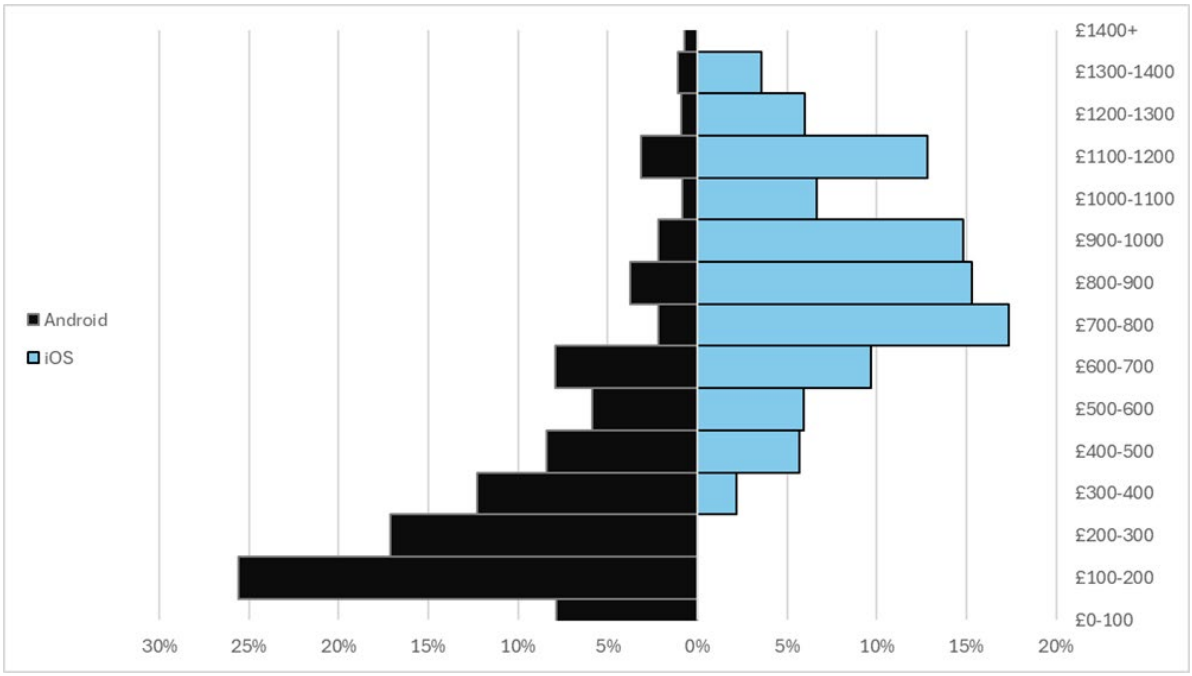
6.25 We have also considered how smartphone sales break down across price categories for each Mobile Platform. Figure 6.2 shows the proportion of new smartphones shipped into the UK by £100 price bands in 2024, separately for iOS and Android.

(a) 51% of new smartphones using Google's Mobile Platform were sold for £300 or less in 2024, and 77% sold for £600 or less.[342]

(b) No new iOS smartphones were sold for £300 or less in 2024, and 14% were sold for £600 or less.[343]

[339] CMA analysis of IDC data from "IDC Worldwide Quarterly Mobile Phone Tracker, February 2025".
[340] CMA analysis of IDC data from "IDC Worldwide Quarterly Mobile Phone Tracker, February 2025".
[341] CMA analysis of IDC data from "IDC Worldwide Quarterly Mobile Phone Tracker, February 2025".
[342] CMA analysis of IDC data from "IDC Worldwide Quarterly Mobile Phone Tracker, February 2025".
[343] CMA analysis of IDC data from "IDC Worldwide Quarterly Mobile Phone Tracker, February 2025".

Figure 6.2: Proportion of smartphones shipped into the UK by £100 price bracket for iOS and Android respectively (2024)



Source: CMA analysis of IDC data from "IDC Worldwide Quarterly Mobile Phone Tracker, February 2025".
Notes: For the purposes of this analysis, we have not split out Huawei's HMS devices from devices using Google's Mobile Platform.

6.26 In relation to tablets, as detailed further in Appendix A, the International Data Corporation (**IDC**) pricing data indicates that:

(a) The majority of new Android tablets (86%) were sold for £300 or less in 2024, compared to 24% of new Apple iPads.[344]

(b) There is more overlap between iPadOS and Android in the range above £300. However, 76% of new iPads sold for over £300 in 2024, compared to 14% of new Android tablets.[345]

6.27 We consider the above analysis illustrated that while Google and Apple overlap in higher-priced devices (>£300), Google's and Apple's presence differs across different price segments. This finding is supported by a range of other evidence, including Google's internal documents.[346]

[344] CMA analysis of IDC data from "IDC Worldwide Quarterly Personal Device Tracker, February 2025".
[345] CMA analysis of IDC data from "IDC Worldwide Quarterly Personal Device Tracker, February 2025".
[346] Google's internal documents are consistent with our pricing analysis, including three presentations which show that: (i) [✂] Google's internal document, [✂] (ii) [✂] Google's internal document, [✂] and (iii) [✂] Google's internal document, [✂].

6.28 Google, Apple and Samsung submitted that Mobile Devices using Google's Mobile Platform and Apple Mobile Devices compete with one another, with Android and iOS devices available at most pricing points.[347] However, [✂] and Samsung recognised that Apple is particularly strong in premium segments.[348]

6.29 We note that the IDC pricing analysis above relates to UK Mobile Devices and that, as set out in the 'parameters of competition' section, Google competes over certain parameters on a global basis. When viewed from a global perspective, Apple's and Google's presence in different price segments is even starker, with a much larger proportion of Android users using lower-priced devices compared to in the UK.

6.30 As detailed in Appendix A, our analysis of 2024 data submitted by Google indicates that globally [✂]. Based on this data which covers [✂] of total global Android users there are [✂] active Android smartphone users globally and of these [✂] used devices sold for $400 or less. These users of lower priced devices accounted [✂] of global revenue. Android users with smartphones priced under $700 made up [✂] of total Android users and accounted for [✂] of global revenue. Google revenue figures are comprised of the Play service fee as well as search ads revenues.[349]

Extent of differentiation with Apple's Mobile Platform

6.31 As set out above, end-users of Mobile Ecosystems have different preferences. Companies differentiate their products to appeal to these preferences. By using this strategy companies highlight unique product attributes, such as price, quality or brand to influence consumer choice and build brand loyalty. Product differentiation is a key strategy employed by Apple in relation to its Mobile Ecosystem.[350] In the context of our assessment, this differentiation means that

[347] Google's response to section 69 notices: [✂] and [✂]. Submission from Google [✂]. Apple's response to section 69 notice dated [✂], and Samsung's response to section 69 notice dated [✂].
[348] Samsung's response to section 69 notice dated [✂]. Submission from Google [✂].
[349] See Appendix A.
[350] In response to the Proposed Decision Apple submitted that it competes and differentiates through the technical integration of its operating systems, apps, and services on each of its devices. For example, Apple stated that, to the extent that its services are not made available on third-party platforms, this is part of its decision to differentiate and compete by selling integrated devices. Apple's response to Proposed Decision, paragraph 19 and 97.

Apple's Mobile Ecosystem and Google's Mobile Ecosystem are less substitutable.[351]

6.32 As set out above, Apple customers are less focused on price than Android customers, and more focused on overall product design, security and privacy features, the compatibility of their smartphone with other personal devices, and on brand.[352,353]

6.33 These preferences are consistent with how Apple differentiates its products. Apple focuses on positioning itself as a premium brand.[354] By offering a tightly controlled and integrated Mobile Ecosystem, it seeks to maintain a reputation for high quality devices and delivering a secure and polished user experience.[355] Apple's tightly controlled and integrated Mobile Ecosystem is in large part designed to deliver the Apple experience to users. Apple's co-founder Steve Jobs described this as Apple seeking to ensure the products and services 'just work'. Its products are 'designed to be loved' with a focus on a highly accessible, intuitive and easy to use customer experience.[356] This product focus is combined with a marketing strategy which includes high profile launch events, with customers historically camping outside stores or enduring long waiting lists to acquire the latest Apple products.[357] [✂] is a key reason why users purchase

[351] The extent of differentiation between Google's and Apple's Mobile Ecosystems is relevant to our assessment because if there is evidence that consumers perceive their offerings as close alternatives, whether they are or not, then (all else being equal) the constraint Apple imposes on Google would be greater. Conversely, if consumers perceive Apple's and Google's Mobile Ecosystems to be different, they are less likely to be competing closely and the constraint imposed by Apple would be more limited. See CC3 (Revised), Guidelines for market investigations, paragraph 198.
[352] Accent Mobile Consumer Survey, Figure 9, Figure 12, Figure 13.
[353] Our consumer survey results also indicate that the features of brand that are important to users are familiarity (cited by 24% of respondents), ease of use (cited by 23% of respondents), compatibility with other devices (cited by 16% of respondents) and trustworthiness/reliability (cited by 16% of respondents). Source: Accent Mobile Consumer Survey, Figure 14. Responses were unprompted.
[354] Apple's response to invitation to comment dated 12 February 2025, page 2.
[355] Apple told us that its integrated approach allows it to 'deliver a high-quality user experience that emphasizes user privacy and security', and that it seeks to deliver a premium consumer experience with basic and essential functionality available out-of-the-box, for example by providing apps like Messages and Reminders. Apple's response to section 69 notice [✂].
[356] In its response to the Proposed Decision in the SMS investigation into its Mobile Platform, Apple submitted that it focuses on selling devices consisting of seamlessly integrated hardware and software, and that Apple is consistently recognised for its user-friendly products. For example, Apple noted that it preinstalls certain apps on iPhones and iPads to deliver the premium out-of-the-box experience that its users expect. Apple's response to the Apple Proposed Decision, paragraphs 36 and 78.
[357] For example, see Apple Events - Apple (UK), accessed by the CMA on 21 October 2025; The i Paper, Apple fans camp out as iPhone 11 and iPhone 11 Pro go on sale in the UK, accessed by the CMA on 21 October 2025; The i Paper, Apple's biggest iPhone overhaul in years ignites upgrade frenzy, accessed by the CMA on 21 October 2025.

Apple Mobile Devices and, relative to Android device alternatives, Apple typically sees [✂].[358]

6.34 On the other hand, Google serves a wider audience with devices using Google's Mobile Platform offered via third-party OEMs at a wide range of price points, from high-specification premium devices to more basic lower-end devices.[359] Google caters to diverse needs and budgets[360] and this strategy has enabled it to build up a very large user base across the world,[361] delivering extensive user attention[362] and data to support its advertising business.[363] Google's Android is typically considered to have a less intense brand ethos than Apple's iOS. Some users like that, in some ways, Android is less restrictive than Apple's tightly integrated Mobile Ecosystem; this can be perceived as offering a greater degree of freedom, customisation, and more innovative technology.[364]

6.35 The evidence indicates that end-users also perceive the two Mobile Ecosystems to be different.

(a) Our consumer survey indicates that operating system preferences affect smartphone users' decisions on whether to switch mobile ecosystem. For example, not liking the iPhone or Android operating system was cited as a reason for not switching by 34% of users who did not consider switching (fifth most popular reason) and 20% of users who considered switching (ninth most popular reason).[365] Identifying more closely with the iOS or Android operating system was cited as a reason for not switching by 37% of users who did not consider switching (second most popular reason) and 24% of users who considered switching (sixth most popular reason).[366]

[358] Google's internal document, [✂].
[359] For example, Google told us that the Pixel series is aimed at users who seek a tech-forward experience - with the Pixel "A" series offering the essentials of a top-tier Pixel experience at a more accessible price. Google's response to section 69 notice [✂].
[360] For example, Google told us that it releases a single version of the Android OS for use on all Android devices regardless of price, and that it does not selectively deploy improvements to the operating system to certain subsets of users. Submission from Google, [✂] and Transcript of Google oral representations [✂].
[361] As set out in Appendix A, Google's Mobile Ecosystem has been the largest in the world since 2014 with its share of supply ranging between 65% and 72% since 2016.
[362] The CMA explained in its Online Platforms and Digital Advertising Market Study (**DAMS**) that "The more user attention a platform or publisher has, the more advertising it will be able to show, and the more revenue it will earn". DAMS Final Report, July 2020, paragraph 5.2.
[363] For example, Google told us that it may use metrics such [✂]. Google's response to section 69 notice [✂].
[364] Google's internal document, [✂].
[365] Accent Mobile Consumer Survey, Table 13.
[366] Accent Mobile Consumer Survey, Table 13.

(b) Google's internal documents show that there are some specific mobile ecosystem preferences which differ among different demographic groups. For example, a presentation [✂] explained that [✂].[367] Other documents indicate that [✂].[368,369]

6.36 In response to the Proposed Decision, Google submitted that: (i) Android and Apple overlap in devices sold above £300 and the fact that Android caters to a broader universe of price points does not change that it competes closely against Apple;[370] and that (ii) standard models of differentiated product competition where firms position themselves on a price-quality spectrum do not apply to Google's mobile activities, as Android devices occupy the full spectrum of the market and the Android operating system is the same across price segments.[371]

6.37 As set out above, mobile end-users purchasing a smartphone or tablet are buying into a mobile ecosystem which includes the Mobile Devices themselves, the mobile platform deployed on this hardware, as well as the digital content accessible via the platform. We recognise that Google and Apple overlap in higher-priced devices and that Android devices are sold across all price levels. This is consistent with our finding that Apple's brand and offering is more targeted at the higher end of the market relative to Google and, therefore, that their offerings are less substitutable from an end-user's perspective. We examine the strength of competition between Apple and Google for different customer groups further in the next section.

Assessing competition for different customer groups

6.38 As part of our overall assessment of competition for end-users, we have considered whether there are important differences in competitive dynamics for different customer groups.

[367] Google's internal document, [✂].
[368] Google's internal document, [✂] and Google's internal document, [✂].
[369] Google further submitted that Apple's mobile devices have an increasing share of younger users which will exacerbate the declining revenue share of the Play Store in future. Google's submission [✂]. We consider this in the section titled 'Play Store's share of revenue across UK mobile devices'.
[370] Google's response to Proposed Decision paragraph 23 and 24.
[371] Google's response to Proposed Decision, paragraph 31.

6.39 We find that the competitive constraint that Google faces is likely to be greater in relation to users with more expensive devices than for other end-users.[372,373]

(a) This is primarily because, as set out above, Apple has a clear focus on premium users and on positioning itself as a premium brand. As set out in the 'Shares of supply' section, Apple sells 82% of devices priced above £600. Overall, users with these more expensive devices make up slightly more than half (58%) of all mobile device users, but less than a quarter (23%) of all Android users.[374]

(b) In contrast, Google provides the only offering for devices below £300.[375] There is therefore a lack of a competitor mobile platform for users buying relatively cheap devices and as such the competitive constraint faced by Google is much weaker for these customers.

6.40 However, even in relation to premium users, we find the competitive constraint to be relatively limited:

(a) Even if users with premium devices are typically more likely than those with cheaper devices to switch to Apple, switching is still limited and most premium users do not even consider switching mobile platform. As explained further below, in our survey, only 18% of users whose current smartphone cost more than £600[376] had switched or considered switching away from their current Mobile Platform[377] (this group accounts for 10% of all users). This means that 82% of these premium users did not even

[372] See also section below on 'Competition from non-Apple Mobile Platforms for end-users'.
[373] In response to our Proposed Decision, Google submitted that the importance of Android seeking to win and retain high-value users in competition with Apple is a consistent theme in Google's internal documents. We consider that a number of documents discuss competition with Apple for premium users and consider how Google can better win or retain users in the premium segment. We consider this is consistent with Apple's focus on the premium segment and the fact that Apple is Google's only rival. Google's response to Proposed Decision, paragraph 25 and [✂] Google's internal documents: [✂] [✂];[✂], [✂]; [✂]. [✂].
[374] See Appendix A for more detail.
[375] For the purposes of our analysis below, we use the term premium to refer to smartphones priced at more than £600. As set out above, we are unaware of any standard, industry-wide definitions for whether, and if so how the smartphone market is segmented. However, we note that it is commonplace for stakeholders to refer to different 'segments', 'price bands' or 'tiers of devices'. Several of Google's internal documents [✂] and contain [✂] Google's internal documents; [✂].
[376] These are the users of premium smartphones (that cost £600 or more) regardless of what the price of the user's previous smartphone was (this question was not asked in the survey). Respondents were instructed to estimate the purchase price of their current phone from a range of price bands (price as new if gifted/refurbished). Discrete price band estimates are likely to contain measurement error. Error is likely to be greater where phones were purchased less recently, gifted or refurbished. Discrete price bands have been aggregated to address these issues.
[377] 8% had switched and 10% considered switching but did not switch.

consider switching.[378] Among previous Android users who now own a premium device[379] 30% switched or considered switching.[380] Whilst this is higher, the majority, ie the remaining 70%, still did not consider switching.

(b) Google has submitted that it is necessary for our assessment of competition for end-users to examine competition for end-users of higher priced devices and premium devices in particular, noting that its Pixel devices are an example of it competing in the premium segment.[381] It submitted that it has a strong incentive to compete for higher spending users [✂], with [✂] of Google's Search and Play revenues coming from devices priced over £300[382] and [✂].[383,384] We agree that users of more expensive devices, and particularly premium users, generate higher revenues for Google on average than users of cheaper devices. However, as explained above, a relatively small proportion of Android users are premium users and only a small proportion of premium users consider switching. In addition, we note that Google's Pixel device sales only account for [✂] [0 - 5]% of active Android devices in the UK in 2024.[385]

(c) Google also argues that the new mobile device market is shifting to the premium segment.[386] The evidence does not suggest the premium segment is growing over time. A number of Google's internal documents refer to a 'premiumisation' trend in the market [✂].[387,388] However, our shares of supply analysis indicates that this is not the case in the UK when the threshold for what is defined as a 'premium' mobile device is adjusted for inflation. Instead, our analysis suggests that, when adjusted for

[378] Accent Mobile Consumer Survey, Figure 32; CMA internal analysis of Accent Technical Use and Behaviour Data Tables (premium user analysis).
[379] These are the users of premium smartphones (that cost £600 or more) whose previous smartphone was Android (regardless of what the price of the user's previous smartphone was as this question was not asked in the survey).
[380] 20% had switched and 10% considered switching but did not switch.
[381] Submission from Google [✂].
[382] Google's response to Proposed Decision, paragraphs 24 and 28 to 30. Submission from Google [✂].
[383] Google's response to Proposed Decision, [✂] and Google's internal document, [✂].
[384] Google submitted that losing premium users to Apple has a significant impact [✂]. Google's response to Proposed Decision, [✂] and Google's internal document, [✂].
[385] Pixel mobile devices accounted for [✂] [0 – 5]% of active Android devices in the UK in 2024. CMA analysis based on Google's response to section 69 notice [✂].
[386] Google's response to Proposed Decision, paragraph 25. Submission from Google [✂].
[387] For example, a presentation from 2023 notes that [✂]. Google's internal document, [✂]. Similarly, a presentation from January 2024 states that [✂].
We note that Google [✂].
[388] In its response to the Proposed Decision, Google stated that its internal documents attest that the premium segment, where Apple is winning, accounts for an ever-growing share of devices. Google's response to Proposed Decision, paragraph 25.

inflation: (i) the share of Mobile Devices sold in the UK in the premium segment has slightly decreased between 2021 and 2024;[389] and (ii) Android's share of the premium segment in the UK has remained relatively stable over this period, accounting for around 14% of new premium devices sold in 2024.[390] We also note that Google's internal documents discussing [✂].[391]

6.41 Our analysis of Google's market power relates to consumers across all price points. The competitive constraint in relation to premium users is insufficient to act as an effective constraint across all Google's end-users, including those with cheaper devices, for whom Apple's Mobile Platform is less likely to be a viable alternative:

(a) Premium users comprise 23% of Google's smartphone users in the UK. Users with lower priced devices costing less than £300, the price threshold below which Apple does not offer a smartphone at all, comprise 51% of Google's smartphone users and account for [✂][392] of Google's total Play fee and search ads revenue in the UK in 2024.[393] Our analysis of the competition Google faces for end-users, set out in this section, considers all users.

(b) The strength of the competitive constraint Google faces and its incentive to improve its offering in order to gain or retain customers will depend on the relative size of the group of customers who switch or consider switching

[389] CMA analysis of IDC data indicates that: (i) in 2021, 52% of all smartphones were sold for more than £600; and (ii) in 2024, 49% of all smartphones were sold for more than £700 (£600 in 2021 is equivalent to approximately £720 in 2024, and we use £700 as IDC data is only available in £50 brackets).
[390] CMA analysis of IDC data indicates that: (i) in 2021, Android accounted for 14% of smartphones sold for more than £600 and iOS accounted for 86%; and (ii) in 2024, Android accounted for 14% of smartphones sold for more than £700 and iOS accounted for 86% (£600 in 2021 is equivalent to approximately £720 in 2024, and we use £700 as IDC data is only available in £50 brackets).
[391] For example [✂] Google's internal document, [✂]. See also Google's internal document, [✂].
[392] Google's response to section 69 notice [✂].
[393] Google also submitted that the Proposed Decision commits the 'toothless fallacy'. Transcript of Google oral representations, [✂]. Google claims that the CMA wrongly found that Android does not compete with Apple because a subset of consumers (namely, users of Android devices costing less than £300) allegedly cannot switch to Apple. The toothless fallacy can arise in the context of market definition where a product or service is excluded from the market on the basis of the preferences of a small group of customers. In our case, we have not excluded Apple's Mobile Platform as part of a market definition exercise. On the contrary, we have placed a lot of emphasis on assessing Apple as a competitive constraint on Google throughout our SEMP assessment. We consider the extent of this constraint across all price segments, including those who purchase low-cost devices as well as premium users. Further, as set out in the 'Shares of supply' section above and Appendix A, devices that sell for £300 or less accounted for 23% of all new smartphone sales in the UK in 2024, which is a sizeable group. CMA analysis of IDC data from "IDC Worldwide Quarterly Mobile Phone Tracker, February 2025".

compared to the proportion who do not consider switching.[394] As explained above, active and engaged users are a small subset of all users, and active and engaged premium users a subset of these.

(c) Google submitted that its efforts to win and retain users of premium devices benefit all users, including users of lower-priced devices.[395] We do not consider this is the case:

(i) The extent to which competition for premium users can protect other users from the effects of limited competition depends on the extent to which the firm is able to discriminate between those who can and would switch and those who would not. As discussed above, quality is an important parameter of competition between mobile platforms and while they may not discriminate on this parameter between users, product improvements or innovation can be targeted at premium users who are more likely to switch. We find that several Google internal documents indicate that [✂].[396] [✂].[397]

(ii) Features aimed at premium users will not always function as well or at all on lower-end devices. Google told us that certain Android features and functionalities do not run, or do not run as well, on lower-end devices due to hardware limitations, and may only become available on cheaper devices with a time-lag. For example, Google stated that certain advanced AI capabilities supported by the Android OS—such as Gemini Nano—require a more advanced processor (i.e., chip) to run. [398]

[394] In this context we note, when considering competition through investments in innovation and product improvements, that firms incurring fixed costs are more likely to do so, the greater the number of customers they are likely to gain or retain as a result. We therefore find that all else equal, a smaller proportion of users who are likely to switch will drive lower levels of investment than a higher proportion.
[395] Google's response to Proposed Decision, paragraph 26.
[396] Google told us it does not discriminate between users of more expensive and less expensive devices when it comes to innovating Android and Play. Google's response to Proposed Decision, paragraphs 24 to 30. Submission from Google [✂]. As noted above, we consider that other evidence demonstrates that Google does target certain innovations at premium users.
[397] Google submitted that it does not 'discriminate or see a difference between lower-end vs higher-end users' and that there is no evidence that premium users value innovations differently to premium users. Google noted: (i) Google internal documents that shows Google does not segment user preferences by device price; (ii) evidence from the Accent consumer survey which shows that users of premium and non-premium devices choose devices for similar non-price reasons. Submission from Google [✂]. However, as explained above, several Google internal documents indicated [✂]. Further, as detailed in Appendix D, we consider the Accent Mobile Consumer Survey provides evidence that non-premium and premium users may value different innovations.
[398]Submission from Google [✂]. Consistent with this, Samsung told us that certain Android OS features may not be supported on lower-end devices due to hardware resources or other constraints. Note of a call with Samsung [✂].

6.42 In what follows, we have considered evidence on the proportion of users that switch or consider switching between mobile platforms across the whole spectrum of end-users. We have also considered the proportion of customers who do not consider switching and whether there are barriers which may limit the ability or willingness of users to switch. We have considered the switching behaviour of customers in different price segments but, as explained above, conclude on what this tells us about competition for end-users in the round.

End-user switching between Apple and Google Mobile Ecosystems

Context

6.43 When consumers single-home, effective competition relies on consumers being willing and able to switch to an alternative service provider if it has a superior offering.[399] A strong competitive constraint would therefore typically manifest itself in a sizeable proportion of users switching suppliers. However, low switching can be consistent with strong competition if there is a material proportion of customers actively *considering* switching (but choosing not to do so), and these customers are well-informed about their choices and face low switching barriers (perceived and actual). This means that evidence on switching levels must be considered alongside evidence on consumer behaviour (including in particular whether consumers consider switching) and switching barriers. We consider all of these in our analysis below.

6.44 When interpreting switching levels between mobile platforms, it is important to remember that end-users are typically limited to choosing between just two.[400] While there are some circumstances in which duopolies, in particular in undifferentiated goods markets can, in theory, lead to competitive outcomes,[401] the evidence does not support such a finding in this case. As already established above, mobile platforms is a complex digital activity and Apple and Google offer differentiated products aimed at somewhat different customer segments. Evidence, including our survey results, shows that many mobile platform users prefer one to another for a multitude of reasons, amplified by brand loyalty and price segmentation. There are also high barriers to entry. We

[399] Unlocking digital competition: Report from the Digital Competition Expert Panel, paragraph 1.84.
[400] As explained below, Google's Mobile Platform faces very limited competitive constraints from non-Apple Mobile Platforms for end-users, such as those operated by Amazon and Huawei.
[401] For example, in the Bertrand competition model (which is based on the assumption that firms set their prices and let the market determine the quantity sold), when firms are selling identical products and there are no capacity constraints, the Bertrand equilibrium leads to the outcome where the price equals marginal cost. Varian, Intermediate Microeconomics p512-513

do not generally expect this type of duopoly, which departs significantly from the conditions under which duopolies in theory lead to competitive outcomes, to generate effective competition.

6.45 In the absence of other alternatives for end-users, we expect there to be some switching between Apple and Google. However, for the switching evidence to show that Apple is a strong constraint on Google as Google claims (given the differentiated product duopoly context above), we would need to see high levels of switching. Absent that, we would need to see sufficient evidence that Google's share of end-users is highly contestable – this would require evidence that a large proportion of end-users actively consider Apple's Mobile Platform and face low barriers should they choose to switch.

Levels of switching and consideration of switching

Overall levels of switching

6.46 Evidence from our consumer survey shows that only a small proportion of end-users switched from Apple's iOS smartphones to Google's Android and switching from Google to Apple, whilst higher, is still limited.

6.47 Our consumer survey specifically considered the degree to which end-users moved, or considered moving, between mobile ecosystems when they last replaced their smartphone.[402,403]

(a) For those users whose previous smartphone was based on Google's Android:

(i) 14% switched from Android to Apple's iOS.

(ii) 10% considered switching but ultimately did not do so.

(iii) 76% did not consider switching at all.

(b) For those users whose previous smartphone was an Apple iPhone:

[402] The consumer survey undertaken by Accent Research used a random probability methodology and surveyed 2,851 smartphone users. Consumer_survey_report1.pdf

[403] Our consumer survey did not target tablet users but did ask some questions which about barriers to switching where the presence of devices linked to the user's operating system was an option users could choose. Further detail can be found in Accent Mobile Consumer Survey.

(i) 4% switched from iOS to Android.

(ii) 11% considered switching but ultimately did not do so.

(iii) 85% did not consider switching at all.[404]

6.48 When considering all users, 9% switched (from iOS to Android or vice versa), 11% considered switching but ultimately did not do so and 81% did not consider switching at all.[405]

6.49 Google submitted that switching from Android to iOS is commonplace based on both Google's own data and the results of our survey reported above.[406] More specifically, Google submitted that its internal data indicates that [✂] of its UK users switch to iOS each time they buy a new device.[407] We do not agree with Google's interpretation of the data as showing that switching is commonplace. Our survey shows that the rate of switching from Google to Apple is 14%, or 1 in 7.[408] In other words, 6 in 7 users do not switch to Apple when buying a new device. Google's internal data, despite using a different methodology for switching rates, is [✂].

6.50 Furthermore, Google submitted that both economic literature and CMA precedent have treated significantly lower switching rates as evidence of close competition, citing examples of switching between different brands of orange juice and margarine, as well as switching rates found by the CMA in the Sainsbury's/ASDA merger and in the retail banking market investigation.[409] We do not consider that it is valid for us to benchmark the switching rates between mobile platforms against those found in other markets and other types of investigations.[410] Rather, an assessment of switching levels needs to be context and case-specific. Accordingly, in this case, we consider the rate of switching

[404] Accent Mobile Consumer Survey, Figure 27.
[405] Accent Mobile Consumer Survey, Figure 2.
[406] Google's response to Proposed Decision, paragraph 12.
[407] Google's response to Proposed Decision, paragraph 12a.
[408] In particular: (i) our switching rates are based on survey data and represent the proportion of users who owned an Android smartphone at the time of purchasing their current smartphone and switched to an iPhone; and (ii) Google's estimates are based on their own user data and represent the proportion of Android users who purchased a new smartphone in the year 2024 and switched to an iPhone. Google's response to section 69 notice [✂].
[409] In particular, Google noted that: (i) an academic paper found switching rates of 14-22% between different brands of orange juice and switching rates of 10%, 16% and 18% between different margarine brands; (ii) in the Sainsbury's/Asda merger case, the CMA found 20-30% of survey respondents would consider switching between Sainsbury's and Asda; and (iii) in the retail baking market investigation, the CMA identified a 13% switching rates for saving products as a favourable benchmark. Google's response to Proposed Decision, paragraph 16.
[410] We also consider it is not appropriate to compare these switching rates to the '1 in 4' statistic which includes not only those who switched but also those who considered switching.

specifically in the context of mobile ecosystems drawing on the size of the consumer groups who are not only not switching but are also not considering switching.

6.51 We asked third parties for their views on the level of switching between Apple and Google. Apple submitted that switching rates are material[411] but third-party OEMs told us that there is limited switching between mobile ecosystems.[412] In particular:

(a) [✂].[413]

(b) Motorola stated that switching between iOS and Android is less frequent than within the same ecosystem. It further expanded that most users consider their current smartphone brand when shopping and the majority stay within the same mobile operating system.[414]

(c) Sony submitted that it is generally easier for users to continue using the same mobile operating system because they can keep using the same apps and are familiar with the system.[415]

Consideration of switching

6.52 Google submitted that the CMA's Consumer Survey shows around one in four Android users either switching or considering switching to Apple,[416] that it is the response of these marginal users that matters and that the fact that not every single user may switch is irrelevant.[417] We agree that not all customers need to switch or consider switching to prevent a firm from deteriorating its offer.[418]

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[411] Apple's response to section 69 notice [✂].
[412] We note that in response to the Invitation to Comment: (i) Chamber of Progress highlighted that switching between Apple's and Google's Ecosystems is viable and actively facilitated, for example by Google making core services like Chrome, Search, Gmail, and Maps available on Apple's mobile devices, which reduces switching costs for consumers (Chamber of Progress's response to invitation to comment dated 12 February 2025, pages 1 to 4.); and (ii) International Center for Law and Economics argued that there is high user churn between iOS and Android, with consumers frequently switching between the two and therefore not suffering from 'lock-in'. It further noted that data portability measures, such as Apple's 'Move to iOS' and Google's 'Data Transfer Tool', further reduce switching costs. (International Center for Law and Economics' response to invitation to comment dated 12 February 2025, page 3 to 6.)
[413] [✂].
[414] Motorola's response to section 69 notice [✂].
[415] Sony's response to section 69 notice [✂].
[416] Google's response to Proposed Decision, paragraph 12b.
[417] Google further submitted that it matters whether sufficient switching takes place at the margin to render a SSNIP or SSNDQ unprofitable. Google's response to Proposed Decision, footnote 13.
[418] On Google's submission that 1 in 4 users already switch or consider switching absent any relative SSNIP or SSNDQ (Google's response to Proposed Decision, footnote 13), we also do not agree on the broader point that the 1 in 4 statistic is an underestimate of the true size of the marginal group, which we consider could be either larger or

However, the focus of our assessment is on the extent of Google's market power in relation to end-users as a whole.[419] As we highlight below, 76% of users do not consider switching at all based on our survey data[420] and the size of the group who considered switching is small in comparison. As set out above, low switching levels are generally indicative of a limited competitive constraint unless there is evidence of customers actively considering their options. We do not observe this in the survey data or Google's internal documents.[421]

Level of switching by price segment

6.53 We also considered the evidence on switching in different price segments.[422] Our consumer survey results show that among Android smartphone users, switching is higher in the premium segment than for non-premium devices, although the rate of switching for premium users is lower than Google's data suggests.[423] The survey data shows that 20% of premium users whose previous phone was Android[424] had switched to an iOS smartphone (compared to [✂]). In comparison, in the £301 to £600 segment, 13% of users whose previous phone was Android had switched to an iOS smartphone; and in the segment of phones priced at £300 or less, 6% of users whose previous phone was Android had switched to an iOS smartphone.[425]

6.54 The opposite was true for those who switched from iOS to Android smartphones. The rate of switching to Android in the premium segment (over

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smaller. For example, it could be smaller because those who have switched or have considered switching may have done so for reasons other than a deterioration in quality (eg an upgrade or to be in the same Mobile Ecosystem as their friends or family).

[419] We would expect that even a firm that has substantial market power would have marginal customers and focussing only on marginal customers would risk reaching the wrong conclusions because of the cellophane fallacy. The cellophane fallacy refers to situations in which significant market power is already being exercised so analysing observed behaviour at existing prices can lead to an incorrect inference being drawn that market power does not exist. The name arose from a US Supreme Court case involving cellophane - US v El Du Pont de Nemours & Co [1956] 351 US 377.

[420] Accent Mobile Consumer Survey, Figure 27.

[421] For example, (i) a Google internal document [✂] states that only [✂] considered both Android and iOS [✂] and (ii) another Google internal document [✂] shows that only [✂] considered both Android and iOS [✂].

[422] Respondents were instructed to estimate the purchase price of their current phone from a range of price bands (price as new if gifted/refurbished). Discrete price band estimates are likely to contain measurement error. Error is likely to be greater where phones were purchased less recently, gifted or refurbished. Discrete price bands have been aggregated to reduce the effect of this measurement error.

[423] Google submitted that there is fierce competition for buyers of premium devices citing switching rates from Android to iOS being greater for premium mobile devices, [✂]. Submission from Google [✂]. Google also submitted that Apple is 'winning competition for premium users'. Google's response to Proposed Decision, paragraph 30.

[424] Ie those whose current device cost over £600 – see the Assessing competition for different customer groups… above.

[425] CMA analysis of the Accent Mobile Consumer Survey

£600) was 2% of users whose previous smartphone was an iOS, 5% in the £301-£600 segment, and 14% in the £300 and less segment.[426]

6.55 The differences above are averaged out when switching in both directions is taken into account. When considering all smartphone users (both iOS and Android), premium users were no more likely to switch operating system than non-premium users. The percentage of smartphone users switching operating systems when they last purchased their current smartphone was similar for users with smartphones costing less than £300 (8%), £301-£600 (9%), £601-£900 (7%) and £901+ (9%).[427] The proportion of premium users that do not consider switching mobile ecosystem is just as high as it is for other price segments.[428]

6.56 The survey data is consistent with other evidence that indicates that switching between mobile ecosystems often involves users upgrading or downgrading into a different price segment, rather than switching between similarly priced Mobile Devices[429] and in particular that Apple faces a limited threat of customers switching to Android when considering a similar premium mobile device price tier.[430] We consider that this supports our finding that Apple's brand and offering is more targeted at the premium end of the market relative to Google.[431]

Future changes affecting switching behaviour

6.57 The evidence does not indicate that switching behaviour is likely to change significantly over the next five years in a way that would materially alter this element of our assessment.

(a) Google submitted that switching tools have the potential to lead to a greater number of users switching between mobile ecosystems in future,

[426] CMA analysis of the Accent Mobile Consumer Survey
[427] Accent Mobile Consumer Survey, Figure 32.
[428] Accent Mobile Consumer Survey, Figure 32.
[429] Google submitted a presentation from 2023 which illustrates that user switching typically occurs between price segments. The document indicates that [✂] while [✂]. The document shows that [✂]. Google's internal document, [✂]. Whilst this document refers to global switchers, we note that switching patterns appear to be broadly consistent for the UK (for example see Google's internal document, [✂]).
[430] [✂].
[431] In response to the Proposed Decision, Google stated that this finding confirms that Android lacks SEMP because it is losing high-spending customers to Apple and contradicts the CMA's thesis that Android and Apple are not close competitors because they focus on different price segments. Google's response to Proposed Decision, paragraph 18.

while also making the Android platform a more attractive proposition for users switching between operating systems.[432]

(b) Apple submitted that given the dynamic nature of competition in Mobile Devices, it cannot predict how user switching will change over the next five years, but that given users can easily switch, switching rates could rapidly change depending on relative attractiveness of competing Mobile Devices.[433]

(c) Xiaomi suggested that some Apple mobile device users might be tempted to switch if Android Mobile Devices continue to offer cutting-edge innovations, and conversely that Apple's innovations could further solidify Apple's position.[434]

(d) Huawei considered that user switching behaviour was [✂].[435]

(e) Motorola anticipated that ecosystem loyalty would continue.[436]

Barriers to switching

6.58 Evidence from our consumer survey, internal documents from both Google and Apple and third-party responses indicate that barriers may contribute to the fact that there is limited switching from Google's to Apple's Mobile Ecosystem.

6.59 Barriers to switching are factors that may cause users to perceive switching to be difficult or costly (eg because they would pose a 'hassle'), discourage potential switchers, and/or impose actual costs on users that do switch (eg financial, time or learning costs).

6.60 Our findings on barriers to switching are as follows:

(a) We have found substantial evidence from our consumer survey, internal documents (from both Google and Apple) and third-party responses of material perceived barriers to switching related to: (i) learning costs associated with switching;[437] (ii) transferring data and apps across Mobile

[432] Google's response to section 69 notice [✂].
[433] Apple's response to section 69 notice [✂].
[434] Xiaomi's response to section 69 notice [✂].
[435] Huawei's response to section 69 notice [✂].
[436] Motorola's response to section 69 notice [✂].
[437] For example: (i) a Google internal document from October 2022 stated: [✂]; Google's internal document, [✂]; and (ii) an Apple internal document from September 2023 [✂] Apple's internal document, [✂].

Devices;[438] and (iii) losing access to other devices (including connected devices) and having a worse experience of interacting with friends' and family's devices.[439,440]

(b) Our consumer survey results indicate that material perceived barriers apply to switching both to iOS and to Android. In response to the Proposed Decision, Google submitted that [✂][441,442]. However, while barriers appear to be more significant for iOS users that did not consider switching than for the equivalent Android smartphone users, our consumer survey results indicate that 27% of Android smartphone users that did not consider switching mentioned one barrier to switching, 15% mentioned two barriers to switching and 13% mentioned three or more barriers to switching.[443]

(c) Where a consumer has imperfect information or knowledge about a product or service,[444] brand effects can help them to make faster and more confident purchasing decisions without the need for extensive research. However, strong brand loyalty can also act as a friction to switching because consumers may stick with a brand out of habit and not explore the products of other firms, even where better options are available. As set out above, brand is important to Mobile Platform end-users and this brand loyalty presents a further switching barrier.[445]

(d) Our consumer survey results also indicate that, in addition to perceived barriers, there is evidence of actual barriers to switching. The Accent survey found that 35% of all users that switched to iOS or Android experienced some difficulty with at least one aspect of the switching journey, implying barriers to switching impose at least some actual costs on users that do switch.[446] In response to the Proposed Decision, Google

[438] For example: (i) an internal document submitted by Google from May 2022 stated: [✂]. Google's internal document, [✂] and (ii) an Apple internal document also found [✂] Apple's internal document, [✂].
[439] A number of Google internal documents recognised the importance of connected devices and the broader ecosystem for user retention. For example: (i) an undated internal document submitted by Google stated that [✂]. Google's internal document, [✂] and (ii) another Google internal document [✂]. Google's internal document, [✂].
[440] Accent Mobile Consumer Survey, Table 13, Figure 35 and Figure 36.
[441] Google's response to Proposed Decision, paragraph 20 and [✂].
[442] We consider Google's submissions related to the Accent Mobile Consumer Survey in more detail in Appendix D.
[443] For iOS users that did not consider switching, 26% mentioned one barrier to switching, 20% mentioned two barriers to switching and 25% mentioned three or more barriers to switching. CMA analysis of the Accent Mobile Consumer Survey. Link to internal analysis
[444] We consider the purchase of a mobile devices is a relatively complex, multi-faceted purchasing decision.
[445] Our consumer survey found that 57% of iOS users and 45% of Android smartphone users selected brand as an important factor in their smartphone purchase decision, with 24% of iOS users and 12% of Android smartphone users selecting it as the most important factor. Accent Mobile Consumer Survey, Figure 9, Figure 12, Figure 13.
[446] Accent Mobile Consumer Survey, page 64.

noted that our consumer survey found that most users who switched found switching tasks very easy.[447] The Accent survey shows that actual barriers faced by those switching were lower than the perceived barriers among users that did not switch. However, 35% of users who switched experienced actual switching costs and this is a material proportion of users.[448]

6.61 Finally, the presence of switching costs may in some circumstances benefit customers by intensifying competition for new customers.[449] However, this is much less likely to be the case in mature markets with large established players.[450] In the case of mobile platforms, as already highlighted above, the vast majority of users are buying a replacement device and hence the pool of 'new' customers is relatively small compared to the pool of existing customers. Both Apple's and Google's strategies will therefore be largely driven by what is profitable in relation to the customers who are already within their Mobile Ecosystems. The presence of switching costs would therefore, on balance, reduce rather than intensify competition. Further, some academic literature (including a paper cited by Apple[451]) suggests that the magnitude of switching costs is important, and when switching costs are high they could dampen the positive effect on competition.[452] We consider that switching costs in mobile platforms are high, for the reasons already set out in this section.[453]

6.62 Based on the evidence set out above, we consider that end-users of Google's Mobile Platform face significant barriers to switching.

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[447] Google Oral Representations [✂].
[448] For example, in reconnecting to other devices, concerns of users that did not switch were notably greater than the experiences of those who did switch (25% of users who did not switch selected 'I had other devices linked to my current phone/operating system' as a reason for not switching; by comparison, just 6% of users who did switch experienced difficulty with 'reconnecting to other devices (eg smartwatch, smart home devices, wireless headphones)'.) Accent Mobile Consumer Survey, Table 13, Figure 50. Consumer_survey_report1.pdf
[449] CC3 (Revised), Guidelines for market investigations, paragraph 317.
[450] Ofcom report titled 'Strategic review of consumer switching', section on 'Impact of maturity of markets and market share', dated 10 September 2010, accessed by the CMA on 14 October 2025.
[451] Apple noted that switching costs may result in lower prices and quoted an article by Dube et al (2009) which explained that this is because 'the incentive for a firm to lower its prices and "invest" in customer acquisition is found to outweigh the incentive for a firm to raise its price and "harvest" its existing customer base' (Submission from Apple, [✂]).
[452] For large enough switching-cost levels, the strategic effects (of firms lowering their prices to defend themselves against other firms' attempts to steal customers) are dampened… [T]he impact of switching costs on equilibrium prices is an empirical question about the magnitude of switching costs. Dube et al (2009) Do Switching Costs Make Markets Less
Competitive?
[453] In particular, we consider them to be higher than in many of the markets studied in academic literature where switching costs were found to reduce prices (for example, the findings in the paper cited by Apple relate to consumer goods such as orange juice).

6.63 In addition, the evidence does not suggest that switching barriers are likely to change and weaken significantly over the next five years. Apple and Google told us they are jointly working on a new data migration tool that will provide a means for users to transfer data between Apple's and Google's Mobile Ecosystems when switching their mobile device. However, [✂].[454]

Outcomes of competition for end-users

Context

6.64 In this section we assess evidence in relation to levels of innovation and consumer satisfaction and consider what we can infer from these in relation to the strength of competition for end-users.[455]

6.65 Mobile ecosystems are characterised by material levels of innovation including quality improvements and relatively high consumer satisfaction. This applies to Google's Mobile Platform.

6.66 Evidence on consumer outcomes (such as quality and innovation or customer satisfaction) can be a useful indicator of the extent of competitive pressures. As with other indicators, it is important to examine what is driving these outcomes. That driver could be competitive pressure; however, it is well established that other motivations - which are consistent with a lack of competitive constraint - may also spur positive end-user outcomes.[456]

6.67 This evidence also needs to be looked at in the context of the overall picture in this case of high and stable shares, split fairly evenly and with limited switching between two differentiated players.

Outcomes in terms of quality and innovation

Level of quality improvements and innovation

6.68 Both Google and Apple have made material improvements to the quality of their Mobile Platforms over time. [457] These include: (i) new Android and iOS or

[454] Google's response to section 69 notice [✂] and Apple's response section 69 notice [✂].
[455] Outcomes related to the price of mobile devices are considered in the 'Competition from Apple for end-users: Shares of supply' section.
[456] See, for example, 'OECD - Competition and Innovation: A Theoretical Perspective policy paper (2023)', accessed by the CMA on 8 October 2025.
[457] Apple's response to section 69 notice [✂] and Google's response to section 69 notice [✂].

iPadOS releases; (ii) introducing AI functionality (ie Google's Gemini and Apple's Apple Intelligence); (iii) improvements to the quality and quantity of content, services and features offered through app stores and browsers; and (iv) greater focus on security and privacy.

6.69 We do not consider that it is informative to attempt to benchmark the level of innovation we see in mobile platforms against those in other technology products given the case-specific nature of the analysis required.

6.70 Google submitted that innovation on Android is high relative to other technology products, using the examples of [✂].[458] However, reflecting the challenges in selecting meaningful benchmarks, we consider that the comparators Google has put forward are not informative or appropriate for our assessment:

(a) [✂] have a much narrower intended purpose, and therefore the scope for innovation is likely to be more limited when compared to Mobile Platforms so any comparison would not be like for like;

(b) in relation to [✂], different incentives are likely to be at play; in particular, incentives such as device upgrades or increasing use of services, which might drive innovation in mobile platforms, are not relevant to such [✂].

Drivers of quality improvements and innovation

6.71 Digital markets are typically characterised by frequent innovation, and, as set out above, high levels of innovation may not be strong evidence of effective competition. In the case of mobile platforms, it may be that innovations are driven by other factors such as to encourage users to upgrade their mobile device (in order to take full advantage of the latest features) and/or to increase monetisation (for example increase in-app transactions or usage of services carrying advertising). Further, it is key to note that innovation by its very nature is multi-dimensional and inherently difficult to measure. An observed high level of innovation may not necessarily be aligned with consumers' needs, and it is innovation that is driven by competition, that is most likely to be beneficial to consumers.[459]

[458] Google response to the Proposed Decision, [✂].
[459] Although innovations driven by factors other than competition may benefit consumers, and could be compatible with vigorous competition, such innovations could also occur in situations with low or even no competition. Further, innovations motivated by factors other than competition may be less aligned with customer preferences, and therefore less likely to maximise consumer welfare.

6.72 Google has submitted that improvements in quality and innovation reflect the competitive pressure it faces from Apple:

(a) Google is under constant pressure to innovate Android to compete with Apple,[460] with the releases of iOS and Android generally closely tracking each other, and competition on innovation, features, and quality between Android and iOS having been described by industry commentators as an 'eternal cycle' and 'one of the most hotly-contested battles in the entire mobile tech space'.[461,462]

(b) The Play Store is also important for competition between Apple's and Google's Mobile Platforms because the presence of an attractive app store (including one that is pre-installed)[463] is an important factor in a user's choice of mobile operating system platform. In relation to this, Google submitted several examples to indicate that it has responded to competition from the iOS App Store.[464]

(c) Innovation in Chrome is according to Google persistent and consistent with 'Chrome facing material competitive pressure, noting that Chrome 'launched 80 features between January 2020 and July 2024.'[465]

6.73 We have considered the available evidence on the factors driving the observed improvements in quality and innovation:

(a) Some internal documents and other documents provided by Google make comparisons with Apple and propose improvements Google could introduce to address any gaps.[466] Others monitor performance relative to Apple.[467] This indicates that competition for end-users could be a factor driving quality improvements and innovations.

(b) However, many other internal documents and other documents provided by Google suggest that quality improvements and innovation are being

[460] Google's response to section 69 notice [✂].
[461] Google's response to section 69 notice [✂].
[462] Google also stated that it 'seeks to enhance OS quality, which in turn improves device quality, to win and retain end users and developers from, in particular, Apple iOS', and provided a list of innovations it has introduced in recent years (Google's response to Proposed Decision, [✂]).
[463] Google's response to section 69 notice [✂].
[464] Google's response to section 69 notice [✂].
[465] Google's response to Proposed Decision, paragraph 100f.
[466] A document [✂]. A document [✂]. A document [✂]. A document [✂]. A Google document discussing [✂]. [✂].
[467] A document [✂]. A document [✂]. A document [✂]. One internal document [✂]; two internal documents [✂]; [✂]; [✂]. A document [✂]. A Google internal document [✂]. A document [✂].

driven by other motivations, including increasing revenue from existing users, competing in new areas such as console gaming, or increasing advertising revenue.[468]

(c) This latter evidence that Google is seeking to generate more revenue from existing users is consistent with its incentives and business model. Google makes a substantial proportion of its revenue and profits in mobile from search advertising services, as set out in Appendix B. This means that Google has a strong incentive to innovate to increase usage of its Mobile Platform to maximise revenues from general search services. Indeed, some of the main AI features, which Google has introduced to its Mobile Platform to date, are innovations directly linked to search.[469] Furthermore there is evidence that innovations have been held back in mobile ecosystems due to a lack of competition.[470]

6.74 We conclude that whilst the evidence of quality improvements and innovation is relevant to our assessment, it is not clear what is driving such innovation: competition and/or other factors, such as revenue maximisation. Accordingly, we take broad account of this evidence in the round alongside other relevant evidence when considering competition for end-users.[471, 472]

Consumer satisfaction

6.75 There is evidence of relatively high levels of consumer satisfaction in respect of Google's Mobile Platform. This is reflected in our consumer survey where we found that 44% of Android non-switchers (and 47% of all smartphone users that did not switch) selected 'I was happy with/preferred my existing smartphone

[468] A document [✂]. Another two documents describe [✂] and [✂]. Another document describes [✂], another document [✂]. A document [✂]. A document [✂]. A document [✂]. Three Google internal documents [✂]; [✂]; [✂].
[469] For example, Google stated that its new Gemini model customised for Google Search 'brings together Gemini's advanced capabilities — including multi-step reasoning, planning and multimodality — with our best-in-class Search systems'. Google Blogs, 'Google I/O 2024: New generative AI experiences in Search' 14 May 2024, accessed by the CMA on 10 October 2025.
[470] The CMA's previous work has identified a range of areas where innovations have been held back in Mobile Ecosystems due to a lack of competition. For example, the MBCG MI found that the limited competition faced by Chrome on Android meant that Google has less incentive to compete vigorously for users by offering features such as browser extensions. See MBCG MI Final Decision Report, section 6, paragraph 6.24.
[471] As a general observation, the presence of innovation can be consistent with a firm facing limited competitive constraints. For example, even a monopolist may have incentives to innovate and improve quality, but the level might be lower and different in nature than in a more competitive market.
[472] For innovations relating to Google's Play Store and Chrome mobile browser, it is possible that these are driven by competition from within Google's Mobile Ecosystem, or from non-mobile alternatives. However, as set out in Chapter 7 we find that the Play Store and Chrome face limited competitive constraints. This further supports our conclusions that any observed improvements in quality or innovations on the Play Store or Chrome are unlikely to be driven by vigorous competition.

brand' as a reason for not switching.[473] In the CMA's survey for MEMS, 69% of Android users indicated their degree of satisfaction for their current smartphone was between 8 and 10, when asked about the level of satisfaction on a scale of 0 to 10 (where 0 was very dissatisfied and 10 was very satisfied).[474]

6.76 Evidence of high consumer satisfaction can be an indicator of competition when assessed alongside other evidence. However, high consumer satisfaction can also be present when there is a lack of effective competition. It is therefore necessary to consider what can be inferred from the relatively high customer satisfaction we observe in the case of Google's Mobile Platform. It is also necessary to then assess those findings alongside a range of other evidence as to the competitive constraints faced by Google.

6.77 Mobile platforms are highly complex technical products which consumers may find difficult to appraise and may do so by reference to previous versions of the same products. There are only two main providers of mobile platforms to compare, and some consumers are likely to have direct experience of only one. Moreover, due to the global nature of mobile platforms, consumers are unable to identify a more competitive benchmark in a different country or region.[475]

6.78 This means that when consumers report that they are satisfied with their mobile platform, we do not consider that it would be appropriate to infer from that evidence alone that innovation and quality levels are objectively high and that there is effective competition. [476] This takes account of our conclusion above that improvements in quality and innovation are themselves not necessarily indicative of competition and could be driven by other factors.[477]

6.79 Google submitted that 'multiple CMA cases' had found that consumer satisfaction is a strong indicator of well-functioning markets, referencing the CMA Energy Market Investigation.[478] As part of our assessment of this submission, we also examined the CMA's Music and Streaming Market Study

[473] Accent Mobile Consumer Survey, Figure 36, Table 13.
[474] Consumer purchasing behaviour in the UK smartphone market for the CMA's Mobile Ecosystems Market Study, Figure 11.
[475] This is unlike in some other markets (eg telecoms) where there may be awareness of what a more competitive market can deliver.
[476] Further, this may be particularly true if in the presence of more intense competition there would have been significant, disruptive innovation. There is evidence (referred to in MBCG MI, section 6, paragraph 6.24) that innovations have been held back in Mobile Ecosystems due to a lack of competition. Missing out on disruptive innovation may be particularly difficult for consumers to observe.
[477] Google has also disagreed with our suggestion in the Proposed Decision Report (**PDR**) that users cannot assess whether they are satisfied (Google's response to Proposed Decision, paragraph 14. Google Oral Representations, [✂]). For the reasons set out in this section, we continue to believe that consumers may not always be well placed to appraise different Mobile Platforms.
[478] Google's response to Proposed Decision, paragraph 14. Google Oral Representations [✂].

and CMA's Retail Banking Market Investigation, noting that customer satisfaction was also considered in these cases.

6.80 The question as to whether consumer satisfaction is or is not reflective of competition is specific to the case at hand; and the fact that the CMA found that consumer satisfaction to be an indicator of competition in different cases examining different markets is unlikely to have a bearing on our findings in this case.

6.81 Indeed, there are very significant differences in the market structures and competitive dynamics in these other cases compared to Google's Mobile Platform, and in these cases consumer satisfaction was one indicator among many others which formed the basis of the CMA's findings:

(a) The CMA's Energy Market Investigation noted difficulties in interpreting consumer satisfaction levels in the absence of appropriate benchmarks.[479] The investigation also noted that user satisfaction reported by customers who had not considered switching was 'unlikely to be based on an understanding of the alternatives available to them – because these respondents had not considered switching or shopped around'.[480]

(b) In the CMA's Music and Streaming Market Study, the CMA decided not to make a market investigation reference based on its assessment of a range of evidence, including its finding that issues such as high entry costs, barriers to switching and barriers to innovations did not raise substantial competition concerns, as well as its finding of high consumer satisfaction. However, the report did not suggest that high consumer satisfaction levels are always indicative of a well-functioning market.[481]

(c) The CMA's Retail Banking Market Investigation noted that 'customer experience metrics such as satisfaction will be determined at least in part by customers' expectations of product or service quality'. It also stated: 'Since this expectation is likely to be influenced by the range of service offered by current providers, high absolute levels of satisfaction cannot necessarily be interpreted as implying that the market is delivering good outcomes for customers'.[482]

[479] Energy market investigation: Final report, paragraph 10.119.
[480] Energy market investigation: Final report, paragraph 9.129.
[481] Music and streaming market study, final report, Chapter 1 and paragraph 4.96.
[482] Retail banking market investigation final report, paragraph 5.100.

6.82 Having assessed the facts and circumstances of this case, we consider that there is insufficient evidence to conclusively determine whether in this case consumer satisfaction is reflective of competitive pressures or whether other factors are also at play. We take account of this evidence in the round alongside other relevant evidence when considering competition for end-users. This includes our consideration of the switching rates among other things.[483]

Competition from non-Apple mobile platforms for end-users

6.83 Google's Mobile Platform faces very limited competitive constraints from non-Apple mobile platforms for end-users, such as those operated by Amazon and Huawei.

6.84 Google submitted that it competes with other mobile operating systems in addition to iOS, including HarmonyOS, AphyOS, CalyxOS, OnePlus' OxygenOS, /e/OS, Apostrophy OS, Ubuntu Touch, and Sailfish OS.[484]

6.85 We also received submissions from third parties who considered that potential entry of new mobile operating systems from firms such as Huawei, Samsung, Xiaomi, Microsoft and Oppo may weaken Google's position – including in relation to the Android operating system and the Play Store.[485,486]

6.86 Amazon's mobile platform holds a material share of supply of tablets in the UK. Amazon's Fire OS has been the third largest provider in terms of active tablets, with the proportion of active tablets running on Fire OS ranging between [✂] [10 – 20]% and [✂] [20 – 30]% in the period 2017 to 2024.[487] However, Amazon's mobile platform presents a very limited constraint on Google's Mobile Platform for the following reasons:

[483] Google submitted that switching rates should be seen in the context of the high levels of satisfaction reported in our consumer survey and in the consumer survey commissioned by the CMA in MEMS, and that this is consistent with a competitive, well-functioning market. Google also submitted that, while large numbers of Android users switch to iOS, those that do not switch are making a conscious choice to stick with Android because they are happy. Submission from Google, [✂]; Google's response to Proposed Decision, paragraph 13. Submission from Google [✂].
[484] Google's response to section 69 notice [✂].
[485] 6 responses to section 69 notices; [✂],
[486] We note that this evidence relates to the extent of competition Google faces from non-Apple Mobile Platforms for end users. In the section 'Competition for OEMs', we consider the extent of competition Google faces from the risk that OEMs will switching their mobile devices manufacturing to support another Mobile Platform.
[487] This is set out in the shares of supply analysis in Appendix A.

(a) Amazon's mobile platform is only available on tablet devices and not smartphones. Tablet devices represented only 21% of all active Mobile Devices in 2024.[488]

(b) While Fire OS is an Android fork, it does not include the GMS suite of apps. Evidence also suggests that the proprietary app store of Amazon's Fire OS tablets had around a third as many apps as Google's Play Store in 2024.[489]

(c) We have also seen only limited mention of Fire OS in Google's internal documents.[490]

6.87 Huawei's operating system also presents a very limited constraint on Google's Mobile Platform:

(a) we note that historically the company had a larger presence in the UK and supplied Mobile Devices with its own version of Android. Huawei supplied devices using 'Huawei Mobile Services' from May 2019 following US legislation which meant that Huawei could no longer access Google's apps and services, including GMS.[491] The last Huawei smartphone device model was sold in early 2023, and subsequently no new Huawei smartphone models have been available in the UK.[492]

(b) There is evidence that Huawei is putting significant effort and resources into its own operating system, HarmonyOS, and this alternative mobile platform appears to have gained some traction in China.[493] We discuss this below.

(c) However, Huawei told us that it remains subject to restraints on its ability to compete which have had a major impact on its smartphone business in

[488] CMA analysis of market participant data based on Apple's response to section 69 notice [✂] Google's response to section 69 notice [✂].
[489] CMA analysis of market participant data based on Amazon's response to section 69 notice [✂] and Google's response to section 69 notice [✂]. See Appendix A.
[490] Only three Google internal documents refer to Fire OS: (i) One document [✂], Google's internal document, [✂] (ii) One document summarised [✂] Google's internal document, [✂] and (iii) One document [✂] Google's internal document, [✂].
[491] MEMS, paragraph 3.
[492] Huawei's response to section 69 notice [✂].
[493] Huawei's response to section 69 notice [✂].

the UK.[494] Huawei explained that [✂].[495] Huawei therefore provides very little constraint on Google's Mobile Platform in the UK and the evidence does not demonstrate that this position is likely to change significantly in the next five years.

6.88 With respect to the other operating system entrants mentioned by Google, none of these pose a material constraint to Google's Mobile Platform:

(a) Our shares of supply analysis shows that these alternative mobile platform providers have achieved negligible shares of supply in the UK (collectively less than 1%).[496]

(b) Where the alternatives mentioned relate to Mobile Devices, they appear to target niche segments which typically make them poor alternatives for most end-users of Google's Mobile Devices. For example, CalyxOS appears to be very privacy focused.[497]

(c) We have also seen no mention of these other non-Apple mobile platform providers in Google's internal documents.

6.89 Furthermore, in Chapter 8, we note that third parties generally do not consider that the overall position of Google's Mobile Platform will change significantly over the next five years, which further supports the view that operating system entrants are unlikely to impose a significant competitive constraint in this period.

Conclusion on competition for end-users

6.90 We conclude that Google's Mobile Platform faces only a limited constraint from other mobile platforms when competing for mobile end-users as a whole. In particular:

(a) Google's Mobile Platform has held a stable share of supply (between [✂] [30 – 40]% and [✂] [40 – 50]%) over the past seven years in all Mobile Devices.

[494] Following US legislation from May 2019, Huawei can no longer access Google's apps and services, including GMS (MEMS, final report, June 2022, paragraph 3.6)
[495] Huawei's response to section 69 notice [✂].
[496] Please see Appendix A for further details.
[497] CalyxOS, 'CalyxOS', accessed by the CMA on 10 October 2025.

(b) Google's share of supply varies greatly across mobile device price tiers. Google's Mobile Platform accounted for 100% of users who purchased smartphones below the £300 price mark in 2024. On the other hand, at 18%, Google has a much lower share of end-users who bought smartphones priced £600 and above.

(c) Apple differentiates its Mobile Ecosystem from Google's and, as a result, end-users do not generally perceive the two ecosystems to be close substitutes. Apple positions itself as a premium brand and its customers are more brand and design-focused whilst being less price-sensitive. Price is the most important factor for Android end-users. End-users perceive the two ecosystems to be less substitutable – for example the evidence shows that a significant proportion of customers have specific preferences for either the Apple or Google Mobile Platform.

(d) The level of competitive constraint varies across end-users in different price segments. Apple provides a greater competitive constraint in relation to premium users with smartphones priced over £600 relative to non-premium users, but premium users represent less than a quarter (23%) of Google's UK mobile users. However even in relation to premium users the competitive constraint is relatively limited and this is insufficient to act as an effective constraint across all Google's end-users, including those with cheaper devices, for whom Apple's Mobile Platform is less likely to be a viable alternative.

(e) Only a small proportion of end-users switched from Apple's iOS smartphones to Google's Android and switching from Google to Apple, whilst higher, is still relatively low. Those considering switching are likely to be among the most contested by Apple and Google but this group is a minority. The vast majority of smartphone users do not consider switching at all. There are both actual and perceived barriers to switching, for example concerns about loss of data like photos when moving between platforms, and we find these have a significant impact in both directions. Therefore, while there may be some asymmetry in the extent of the constraint the two Mobile Platforms place on each other, we find the constraint in both directions is limited.

(f) Google has made improvements to its Mobile Platform over time and there are relatively high levels of customer satisfaction. However, we cannot robustly infer whether these outcomes are driven by competition or other

factors. Improvements in quality and innovation are equally consistent with Google's incentives to increase revenues from its existing user base, particularly in light of the importance of search services to its overall revenue.

(g) Other mobile platforms pose only a very limited competitive constraint. Amazon's mobile platform in tablets offers limited competition to Google's Mobile Platform and there is even less constraint from other non-Apple mobile platforms which have negligible shares of supply (collectively less than 1%).

(h) Finally, the evidence does not indicate that the above findings are likely to change significantly over the next five years. This is consistent with our findings elsewhere in this report that, based on the evidence we have seen, market, technological, regulatory or other developments are unlikely to change Google's position significantly in terms of competition for end-users over the next five years.

Competition to attract content and service providers

The purpose of Google's Mobile Platform is to facilitate interactions between end-users and providers of digital content and services to enable end-users to access, view and engage with digital content and services.

App developers and providers of web content use Google's Mobile Platform to provide their content and services to end-users. The main way users access content on Mobile Devices is via an app or through a browser and businesses can choose to distribute their content and services as an app and/or as web content.

In this section we consider the competition that Google's Mobile Platform faces from other Mobile Ecosystems to attract such content and service providers. We conclude that Google faces only a very limited constraint from other Mobile Ecosystems to attract content and service providers to develop content for its Mobile Platform.

- In relation to competition for app developers:

- The size of the user base to which a Mobile Platform provides access is the most important factor in attracting app develops to write content for the Mobile Platform. As set out in above in the section on 'Competition for end-users', 50 - 60% of end-users use Apple's Mobile Platform and 40 - 50% use Mobile Devices with Google's

Mobile Platform. These two groups of end-users are distinct as most end-users single home. Even with some limited competition for end-users as set out above, the extent of this end-user base has remained persistently large over time. Apple's and Google's Mobile Platforms therefore provide access to large and distinct customer groups and app developers must ensure their content is available on both Mobile Platforms to reach all end-users.

- We have considered evidence on outcomes in terms of commission fees, innovation and revenue shares and whether the observed outcomes are driven by competition or other factors. We found that we cannot robustly infer whether changes in price and quality are driven by competition, in particular as improvements in quality are consistent with Google's incentives to increase revenues. We also found that changes in the Play Store revenue share are unlikely to be significantly driven by competition.
- In relation to web content, Apple and Google do not compete for web content to be made available on their Mobile Platforms. Rather content providers write content once for distribution across different platforms. Content providers therefore do not choose whether to distribute on one platform or another, as by its very nature web content is broadly available.
- We also find that smaller non-Apple Mobile Ecosystems provide a very limited constraint on Google's Mobile Platform when competing for content providers.

Competition to attract app developers

Parameters of competition

6.91 For an app developer, the choice of what platform to develop content for, and how to distribute that content on the platform are closely related. Google's Mobile Platform offers a range of distribution options including alternative app stores to Google's Play Store and the ability to sideload apps. As we set out in Chapter 7, Google's Play Store is the main distribution route for app developers on Google's Mobile Platform,[498] and these alternatives are considered additional rather than substitutes to distributing through Play. Therefore, in deciding to make content available on Google's Mobile Platform, an app

[498] As set out in below, Google's Mobile Ecosystem has accounted for between [✂] [30 – 40]% and [✂] [40 – 50]% of active mobile devices in the UK. On those devices, the Play Store accounted for [✂] [90 – 100]% of first-time app downloads via app stores. Furthermore, as discussed in Chapter 7, the use of sideloading for downloading apps is limited relative to use of the Play Store.

developer is in practice deciding both to develop for Google's Mobile Platform and to distribute through the Play Store.

6.92 Google competes with alternative suppliers of Mobile Platforms to attract app developers to write and distribute content for their platform, over the following parameters:

(a) Users: The value of a Mobile Platform to a content provider is largely determined by the number of users it can access through it. Based on evidence received from app developers, while user experience, costs and time required to develop apps and functionality available were all cited as important, the size of a user base was the most frequently cited factor driving app developer choices of where to develop and distribute.[499]

(b) Price: As noted below, the vast majority of app developers primarily fund their apps through advertising. However, where an app developer monetises their content through paid apps and in-app purchases, such developer will be subject to a commission fee charged for customer billings processed through each platform's own app store and its billing system. Google submitted that its Play Store service fee commission supports the entire Android ecosystem and the Play Store itself, covering the cost of Android development, security, app distribution, developer tools, and the billing system.[500]

(c) Quality: As per the above, app developers also consider the quality of services provided by a Mobile Platform. This includes the tools and support it provides to app developers, the access to functionality to enable app developers to innovate on new app features, means to increase apps' discoverability and user reach, services to help app developers manage their users, and to help them monetise their content.

[499] The important of the size of a user base is consistent with indirect network effects driving the value of a Mobile Platform ie as noted above, a Mobile Platform is more valuable to a content provider the more users it can access through it. See for example, 12 responses to section 69 notices; [✂].
[500] See information provided in response to the frequently asked questions (**FAQs**) 'Why does Google Play charge a service fee?' and 'What does the service fee pay for?'. Google, Play Console Help, 'Understanding Google Play's Service Fee - Play Console Help', accessed by the CMA on 29 September 2025.

Availability of native apps and app developers on Google's and Apple's Mobile Platforms

6.93 The Play Store on Google's Mobile Platform and the App Store on Apple's Mobile Platform are by far the two largest app stores in the UK, and are comparably sized. For example, in 2024 and across all Mobile Devices in the UK:

(a) The average number of native apps available on the App Store at the end of each month was approximately [✂] [1 – 2] million. The Play Store hosted [✂] [2 – 3] million.[501]

(b) The average number of app developers with apps available across both app stores was similar. The average number of app developers with apps available on the App Store at the end of each month was approximately [✂] [0 – 1] million. There were approximately [✂] [0 – 1] million app developers with apps available on the Play Store.[502]

Constraint from app developers' switching

Considering the need from app developers to be on both platforms

6.94 As set out above, Apple and Google are the two largest Mobile Platforms. Apple supplies around 50-60% of end-users and Google supplies around 40-50%. These platforms serve distinct groups of customers.[503] Therefore to access all these customers, app developers must make their content available on both platforms. This is consistent with the evidence from app developers discussed below which indicates that they consider both the Play Store and the App Store as 'must-have' distribution options and that their choice to develop and distribute content for the Play Store and the App Store is driven by their ability to access two distinct sets of users on Google's and Apple's Mobile Ecosystems.[504]

6.95 The evidence also shows that for this reason, app developers, currently developing for both Google's and Apple's Mobile Platforms, are unlikely to delist

[501] Apple's response to the section 69 notice [✂]. Google's response to section 69 notice [✂].
[502] Apple's response to section 69 notice [✂]. Google's response to section 69 notice [✂].
[503] As explained in 'Parameters of competition' section, evidence suggests that most users single-home.
[504] 22 parties in total. 2 responses to section 69 notices; [✂]. 16 responses to questionnaires; [✂]. 4 notes of meetings: [✂].

their apps on the Play Store (or Google's Mobile Platform, more generally) and by doing so, impose a constraint on the Play Store:

(a) The Play Store represents an essential source of revenue for app developers in the UK. Currently the Play Store provides app developers access to [✂] [40 – 50] million users on Google's Mobile Platform[505] which accounts for [✂] of active mobile device users in the UK.[506] Google's Mobile Platform is therefore vital for app developers seeking to distribute their content and services to those users. Furthermore, while app developers generate less revenue from user spend in apps distributed via the Play Store compared to the App Store,[507] the Play Store is also an important source of user reach for the vast majority of app developers who primarily fund their apps through advertising.[508] Therefore, if an app developer delisted from the Play Store, it is likely that this would have a significant negative impact on the app developer's user base and revenue opportunities overall. Furthermore, a decision by an app developer to develop for the App Store and not the Play Store is unlikely to trigger significant switching on the user side to Apple's Mobile Ecosystem. Users do not tend to consider availability and/or quality of content as one of the most important factors when switching between Google's and Apple's Mobile Ecosystems.[509]

(b) The above is consistent with evidence we have gathered from third parties. A range of native app developers submitted that developing and distributing content via both the Play Store and App Store is the only way to reach sufficient user scale including the only way to access two distinct sets of users on each respective Mobile Ecosystem, indicating both are

[505] As set out in Chapter 8, in 2024, there were [✂] [30 – 40] million active Android smartphone mobile devices and [5 – 10] [✂] million Android tablet devices in the UK.
[506] Google's Mobile Ecosystem has accounted for between [✂] [30 – 40]% and [✂] [40 – 50]% of active mobile devices in the UK. On those devices, the Play Store accounted for [✂] [90 – 100]% of first-time app downloads via app stores. See Appendix A.
[507] In 2024 in the UK on Mobile Devices, app developers earned revenues from customer billings of approximately £[✂] [0 – 5] billion for apps distributed via the Play Store and approximately £[✂] [0 – 5] billion for apps distributed via the App Store. CMA analysis of data provided by Google and Apple respectively. Google's response to section 69 notice dated [✂]. Google's response to section 69 notice dated [✂]. Apple's response to section 69 notice [✂].
[508] As discussed below, more than 90% of app developers distributing their apps on the Play Store do not generate any revenue through Google Play Billing.
[509] Evidence from our consumer survey indicates that only 14% of users who switched selected 'I thought iOS/Android had access to a wider range of mobile app/the apps I wanted to use' as a reason for switching (8th most popular reason cited) and an even smaller proportion of users (2%) cited this as the most important factor. Accent Mobile Consumer Survey, Figure 47; Accent Mobile Consumer Survey, Technical Use and Behaviour Data Tables, Q24. As noted in the section 'Parameters of competition for end-users', the survey data likely reflects the context that both App Store and Play Store are well established and extensive app stores.

'must-have' distribution options.[510,511] In addition, many of these[512] and several other app developers[513] submitted that losing access to either the App Store or the Play Store would have a significant impact on their ability to serve their customers on Mobile Devices. For example, one large native app developer stated that losing access to the Play Store would mean losing access to roughly half the UK market.[514] Further, there is a range of evidence which indicates that app developers, particularly large app developers with the most popular apps, typically develop and distribute apps on both the Play Store and the App Store.[515,516]

Prioritising development for one platform before the other

6.96 We have also considered whether there is evidence that app developers, whilst developing for both Mobile Platforms, prioritise Apple's App Store over the Play Store. Google submitted that app developers often prioritise Apple's App Store over the Play Store because Apple has 'competed successfully' to attract users which are [✂][517] [✂].[518] In its response to the Proposed Decision, Google

[510] Not all app developers that we have contacted during this investigation were asked explicitly about this and / or provided an explicit view on this. 32 parties total. 3 responses to section 69 notices; [✂]. 19 responses to questionnaires; [✂]. 9 notes of meetings; [✂] 1 email correspondence; [✂].

[511] In its response to the Proposed Decision, and in a further submission [✂], Google submitted that the Proposed Decision overlooks evidence that developers prioritise the App Store. Google further submitted that almost 75% of developers when responding to the CMA's survey did not maintain that listing on both Play and App Store is essential for them to access a large and distinct set of users. Google submitted that this contradicted the CMA's core thesis in its Provisional Decision. (Google's response to Proposed Decision, paragraph 63 e); and Submission from Google [✂]. We disagree with this interpretation because in its response Google refers to a range of app developers who did not provide explicit views on whether they must distribute on both the Play Store and the App Store, nor did they submit that they prioritise the App Store. The evidence from app developers that did provide views suggest that app developers do not generally prioritise the App Store over the Play Store – as discussed below.

[512] Some responses did not distinguish between the impact of leaving just the Play Store, while most noted impact of leaving both the Play Store and the App Store. 19 parties total. 17 responses to section 69 notices; [✂] 2 notes of meetings: [✂].

[513] Some responses did not distinguish between the impact of leaving just the Play Store, while most noted impact of leaving both the Play Store and the App Store. 9 responses to section 69 notices; [✂].

[514] [✂] response to section 69 notice [✂].

[515] According to a survey commissioned by Google of 500 app developers across the UK and EU, [✂] [80 – 90]% of app developers distribute via two or more app stores, including Apple's App Store and Google's Play Store. Google's response to section 69 notice [✂]. All but one of the 55 native app developers we gathered evidence from (including 35 large and 20 small native app developers) confirmed that they distributed their apps via both the App Store and the Play Store. 55 parties total. 47 responses to section 69 notices; [✂]. 8 notes of meetings; [✂].

[516] We consider that, even to the extent there are a small proportion of app developers who currently distribute only on Google's Mobile Platform, these app developers are unlikely to see Apple's Mobile Platform as a substitute since, as set out above, it offers access to a distinct set of users. In addition, there are material costs to redeveloping apps for use on the App Store which affects app developers' distribution choices. Specifically, a number of app developers submitted that cost and time required to develop content is an important parameter affecting their content distribution choices. Responses to section 69 notices: [✂].

[517] We consider the extent of competition for higher-spending users in the section above 'Competition for premium users'.

[518] Google's response to section 69 notice [✂].

submitted that app developers prioritise Apple due to higher user spend, provided several internal documents [✂], provided some examples of major apps prioritising the releases of app versions and features on the App Store, and cited some app development guides which discuss prioritising the App Store over the Play Store.[519]

6.97 Some of the evidence suggests that the releases of apps, app updates, or app features on the Play Store may slightly lag behind the equivalent releases on the App Store and that the App Store attracts higher spending users for some app developers (consistent with our conclusions that Apple has stronger presence in higher priced devices, as discussed above in section 'Shares of supply based on price segments'). However, the evidence overall indicates that app developers do not generally prioritise the App Store over the Play Store (or Apple's Mobile Platform over Google's Mobile Platform) other than for a limited period of time and would not generally do so to benefit from better features or terms on the App Store. This is consistent with our conclusions above that the app developers must distribute on both Mobile Platforms.

(a) One internal document from Google reports qualitative research with app developers [✂]. The document describes that [✂]. However, the document also describes [✂]. The document also discusses [✂].[520,521]

(b) Out of the wide range of app developers that were specifically asked whether they prioritise distributing their apps on either the App Store or Play Store, nearly all stated that they do not prioritise either app store and instead seek to release apps and/or updates on both app stores simultaneously.[522] Similarly, two of the app developers which Google submitted as examples of app developers who have prioritised the App Store in the past, submitted that they do not prioritise either the App Store or the Play Store and focus on parity.[523] Many of these app developers further explained that where their releases of apps or updates across the

[519] Google's response to Proposed Decision, paragraphs 63a-d.
[520] The document notes that [✂]. Google's internal document [✂].
[521] In its response to the Proposed decision, Google also cited another internal document which it submitted [✂]. Google's internal document [✂].
[522] 25 parties total. 20 responses questionnaires; [✂]. 5 notes of meetings; [✂].
[523] One those app developers [✂] commented that if there is any delay, it is often a matter of a few weeks and dictated by staffing requirements (eg where aspects of apps may need to be developed specifically for iOS/Android which may require specialist teams and therefore dictate timelines) or organisational priorities. 2 notes of meetings; [✂].

two app stores are not aligned, this is due to operational constraints[524] or for testing purposes,[525] rather than their own commercial desire.[526]

(c) Only two app developers identified the App Store as the primary app store (ie that they prioritise the App Store over other app stores) because users of Apple Mobile Devices tend to spend more money in apps.[527] One of those developers explained that, at present, it normally prioritises the App Store during initial few months but would seek to reach parity between the app stores after that.[528] [529]

(d) Whilst some of the app developer guides, including those referenced in Google's submissions, do highlight that the App Store benefits from premium user base with high spending propensity, various other app developer guides discuss the pros and cons of the App Store and Play

[524] 10 parties total. 8 responses to questionnaires: [✂]. 2 notes of meetings: [✂].
[525] 3 responses to questionnaires: [✂].
[526] Google further submitted that the launch of the Sora app by OpenAI is another example of app developers prioritising the App Store over the Play Store, referring to the evidence that the app is only available on iOS at present and not on Android (see Google's submission to the CMA [✂]). We note that Google's submission indicates that the Sora app has not yet been launched in the UK. [✂]. Note of meeting with [✂]. In addition, we note that OpenAI submitted to us that in the UK, it makes its other app (ChatGPT, not Sora) available on both iOS Mobile Devices and Android Mobile Devices via Apple's App Store and the Google Play Store and that [✂]. OpenAI's response to section 69 notice [✂]. We therefore do not consider this evidence contradicts our conclusion that app developers do not generally prioritise the App Store over the Play Store in the UK and that they need to distribute on both.
[527] 2 notes of meetings; [✂].
[528] Note of meeting with [✂].
[529] However, one small app developer also submitted to us that it prioritises the Play Store over other app stores (ie Apple's App Store) or that it views the Play Store as its 'primary' distribution channel on mobile overall. [✂] response to section 69 notice [✂].

Store more generally and note that the Play Store might be attractive to app developers due to its global scale.[530,531]

Switching by app developers in the future

6.98 Additionally, the evidence does not indicate that switching by app developers to the App Store is likely to change significantly over the next five years such that it would materially constrain the Play Store. Indeed, out of the native app developers who commented on their future expectations for how they distribute apps on mobile, most did not expect any substantial change by 2030 (as set out in Chapter 7), nor did any party suggest any plans to stop multi-homing across both of these two key Mobile Platforms.[532] This is consistent with evidence set out elsewhere in this Chapter and Chapter 7 that emergence of alternative Mobile Platforms and or other content distribution channels within Google's Mobile Ecosystem is unlikely, indicating that Google's Mobile Platform will remain an essential content distribution option for app developers within this period.[533]

[530] One app developer guide cited by Google submit that iOS provides a strategic advantage due to access to high-value user base and should therefore be prioritised specifically by startups. [Growing Pro Technologies, 'Why Startups Should Prioritize iPhone App Development | Blog', accessed by the CMA on 16 September 2025]. Other guides from the same source also emphasise the importance of app development for Android due to the scale of Google's Mobile Platform and also flexibility that it offers. [Growing Pro Technologies, 'Power of Android App Development Services | Blog', accessed by the CMA on 23 September 2025]. Another app developer guide that Google referenced outlines the advantages of iOS app development such as 'unmatched user experience to tapping into a wealthier user base and enjoying the security prowess of Apple', however, does not argue that iOS app development should be prioritised [Enterprise Monkey, 'How to Boost Your Business with iOS Application Development', accessed by the CMA on 16 September 2025]. There are other app development guides that highlight the relative advantages and disadvantages of app development for iOS and Android. For example, some developer guides note that there are higher revenue opportunities on iOS – for instance iOS has a greater focus on premium apps, subscriptions and in-app purchases, while Android has a greater focus on freemium models, ad-based revenue and a wider audience reach. [Plus One Technologies, 'iOS vs. Android App Development: Which One is Better for Businesses in the UK? - Plus One Tech', accessed by the CMA on 23 September 2025]. [London App Development, 'Android vs iOS App Development: Which One To Go For?', accessed by the CMA on 23 September 2025] [Mobile App Developers Ltd, 'iOS vs Android: Which App To Develop First As A Startup - MADUK', accessed by the CMA on 23 September 2025]

[531] As noted above in the section 'Overall shares of supply', globally, Google provides the largest mobile ecosystem and accounts for a substantial share of active mobile devices (between 65% and 72% in each year since 2016)

[532] 30 responses to section 69 notices; [✂]. 2 notes of meetings; [✂].

[533] See Chapter 7 titled 'Competition from alternatives to Google's Native App Distribution', where we set out that the evidence overall does not indicate that market participants expect a significant change to distributing primarily via the Play Store within Google's Mobile Ecosystem over the next five years, and Chapter 6 'Competition from non-Apple Mobile Platforms for end-users', where we set out that the evidence overall does not indicate that alternative (non-Apple) Mobile Platforms are likely to emerge as commercially viable alternatives to Google's and Apple's Mobile Platforms within this period, including as a result of future technological and market developments, discussed in Chapter 8.

Outcomes of competition for app developers

Context

6.99 This section considers evidence on a range of outcomes and considers what we can infer from these in relation to the constraint that Google's Mobile Platform faces from Apple's Mobile Platform in relation to app developers.

6.100 As described above in the section 'Outcomes of competition for end-users', evidence on outcomes can be a useful indicator of the extent of any competitive pressures present. However, it is important to examine what is driving these outcomes. That driver could be competitive pressure; however, it is well established that other motivations - which are consistent with a lack of competitive constraint - may also spur positive customer outcomes.

6.101 This evidence also needs to be looked at in the context of the overall picture of Apple and Google both being 'must have' platforms for app developers, and therefore app developers needing to develop and distribute their content through both platforms, even if one platform offers better commercial terms and/or quality improvements.

6.102 We also note that outcomes, to the extent they are driven by competition, will be determined not only by the constraint that the Play Store faces from the App Store but also from alternative app stores and other alternative ways of distributing content within its Mobile Ecosystem as well as constraints from non-mobile alternatives. As such, when considering the extent to which outcomes are consistent with effective competition, we have also taken the evidence set out elsewhere in this Chapter as well as Chapter 7 into account.

Commission fees for app developers

6.103 This section considers the extent to which the Play Store competes with the App Store on commission fees[534] for app developers, particularly in light of various submissions from Google that the reductions in those fees should be interpreted as evidence that the Play Store faces strong competition.[535] As noted above, whilst the vast majority of app developers monetise their content through advertising, a small proportion of app developers are monetising their content through paid apps and in-app purchases and as such, are subject to

[534] Google refer to commission fees as 'service' fees.
[535] See for example Google's response to Proposed Decision, paragraph 73.

commission fees. Overall, some evidence indicates that the Play Store's fees have fallen in the past, and that some of the fee reductions might have been in response to similar reductions implemented by the App Store. However, other evidence is consistent with the Play Store facing limited competition on fees. As such, we find that it is difficult to determine whether reductions in commission fees are driven by competition. Accordingly, we take broad account of this evidence in the round alongside other relevant evidence when considering competition for content providers.

6.104 Reductions in commission fees could be consistent with the Play Store facing increasing competition from rival Mobile Platforms or other forms of content distribution. In markets subject to effective competition firms will seek to win business by improving their prices and other aspects of their offer. However, prices in the market can also be affected by factors unrelated to competition and reductions in prices can be observed even under monopoly. Therefore, evidence of reductions in commission fees alone may not be indicative of whether the Play Store faces effective competition.

6.105 We have therefore considered in our assessment: (i) whether there is evidence of material reductions in the commission fees charged by Google's Mobile Platform; and (ii) the extent to which any such reductions are indicative of the strength of competitive constraints on Google.

6.106 The evidence shows that over time Google has made some reductions to its commission rates for app developers. Google currently charges a headline commission of 30% for payments for digital content made via Google Play Billing system.[536] In particular, Google submitted that it has competed with the App Store on price; for instance, in 2021 it reduced its effective fee rate to 15% for the first $1 million that app developers earn, in response to similar announcements by Apple. Google also submitted that it reduced its rates to 15% applicable on certain subscriptions in response to similar changes announced by Apple.[537] Additionally, Google submitted that since it launched the Play Store in 2008, its commission fees have only ever declined, noting that today 99% of app developers that pay the service fee pay 15% or less.[538] In

[536] Google's response to section 69 notice [✂].
[537] Google's response to section 69 notice [✂].
[538] Submission from Google [✂].

response to the Provisional Decision, Google further submitted that Play's average fees have reduced by 20% since 2020.[539]

6.107 However, the reductions in those rates are not as extensive and widespread as Google suggests and do not indicate a sustained and material downward trend:

(a) First, we note that no major changes to the Play Store's commission rates have been announced in the last four years, ie since 2021.

(b) Our analysis set out in Appendix A shows that the Play Store's annual average commission rate on Mobile Devices per transaction decreased from [✂] [20 – 30]% to [✂] [20 – 30]% in the period between 2020-2024.[540,541] However, the majority of the decline in average commission rates was observed in and around 2021, coinciding with the timing of the last changes to the commission rates implemented by Google.[542] In addition, the average commission rates remained largely stable over the last three years and this is consistent with the lack of changes to the Play Store's commission rates in the last four years.

(c) In addition, as set out in Appendix A, the average reduced rates apply only to a small proportion of the total value of transactions and the majority of revenue earned by app developers ([✂] [60 – 70]%) is charged at higher commission fees.[543]

(d) Our analysis in Appendix A also shows that of the app developers that were paying Google Play commission fees, [✂] [50 – 60]% had an average rate of 15% or less. This, however, contrasts with Google's submission that, globally, 99% of app developers using Google Play Billing pay the service fee of 15% or less.[544] Furthermore, whilst the proportion of

[539] Google's response to Proposed Decision, paragraphs 56 and 76.
[540] Google's response to section 69 notice [✂]. Google's response to section 69 notice [✂].
[541] In response to the Proposed Decision, Google submitted that this figure incorrectly omits revenue [✂] and therefore underestimated reductions in average commission fee levels. Google's response to Proposed Decision, paragraph 76. As noted in Appendix A of the Proposed Decision, the data on commission fees excluded [✂] because Google was not able to attribute this revenue specifically to mobile devices. However, in light of further evidence submitted by Google showing that this revenue is material and that the majority of this revenue is earned on mobile devices, we have updated our assessment of the average commission fees. As explained in the Appendix A, the average fees might therefore be underestimated given they overestimate the fees earned from [✂].
[542] As set out in Appendix A, the average commission rate on Google Play Billing reduced from [✂] [20 – 30]% in 2020 to [✂] [20 – 30]% in 2021 and then [✂] [20 – 30]% in 2022.
[543] As set out in Appendix A, [✂] [60 – 70]% of customer billings were paid to app developers with average commission rates in the highest price bracket (rate of 25% or higher) in 2024.
[544] We understand that the basis for Google's submission is that of those app developers that are subject to commission rates, 99% are *eligible* for a fee of 15% or less. Google Support, 'Service fees - Play Console Help',

app developers paying reduced rates has increased, evidence suggests that this increase could in part be driven by more app developers offering paid apps and in-app purchases to their users through Google Play Billing.[545]

6.108 Google submitted that its commission fees are in line with, or below, relevant benchmarks including: (i) fees charged by other app stores (eg the App Store and Android app stores); (ii) fees [✂]; (iii) fees [✂]; and (iv) fees [✂].[546]

6.109 In light of Google's submissions, we note that in principle benchmarks can be useful in some circumstances where it is important to determine whether the observed prices are reflective of competitive prices (for example, for the purposes of a determination of whether prices are excessive and unfair) and where there are benchmarks which reflect analogous or similar markets and are determined by well-functioning competition.[547] However, based on the evidence gathered during the course of this investigation, we do not consider that the available potential comparators are likely to be informative of competitive levels of commission rates on the Play Store:[548,549] Furthermore, we have not assessed competitive conditions in [✂] as part of this investigation (such as

accessed by the CMA on 14 June 2025. We understand 99% to include app developers who pay rates of 15% or less on some transactions (eg the first $1 million of their turnover) as well as the rates above 15% on other transactions.

[545] From 2020 to 2024, the proportion of app developers which are subject to an average rate of 10-19.99% has increased by [✂] [0 – 10] percentage points. Over the same period, the proportion of app developers subject to an average rate of 25% or higher has decreased by [✂] [0 – 10] percentage points. This implies that the observed changes cannot be fully explained by app developers moving from higher fees to reduced fees. Furthermore, from 2020 to 2024, the proportion of app developers who pay fees through Google Play Billing has increased by [✂] [0 – 10] percentage points, from [✂] [0 – 10]% to [✂] [0 – 10]%. See Appendix A. In its response to the Proposed Decision, Google also submitted that the proportion of paying app developers [✂]. Google's response to the Proposed Decision, [✂].

[546] Submission from Google [✂]. Google's response to Proposed Decision, paragraph 80.

[547] In its response to the Proposed Decision, Google appeared to agree with this point, see Google's response to Proposed Decision, paragraph 81 and footnote 88.

[548] This is because some benchmarks such as fees charged by the App Store or alternative app stores refer to prices that are not themselves likely to be the product of effective competition. As explained above, app developers typically distribute their apps on both the Play Store and the App Store as 'must-have' and distinct distribution channels, suggesting that the App Store does not face a strong constraint to attract app developers, including by offering them competitive commission rates. As part of this investigation, we have not assessed whether the fees charged by other app stores in the UK are set at competitive levels such that they could act as appropriate comparators. However, we note that there are material barriers to entry and expansion (discussed below in 'Barriers to entry and expansion in mobile platforms' as well as 'Barriers to entry and expansion on Android') which may limit competition on commission fees.

[549] In its response to the Proposed Decision, Google also submitted that the Play Store's fees in 2008 - when it first launched and could not have held market power - are also a relevant benchmark for determining whether the current fees are competitive. Google's response to Proposed Decision, paragraph 83. We do not consider that fees dating back to 2008 are appropriate benchmarks, given that the Play Store was materially different in 2008, for example in terms of the number of users and app developers that it served.

[✂]) nor determined whether factors driving prices on [✂] platforms could be analogous to those driving the Play Store's commission fees.

6.110 Google submitted that the competitive pressures the Play Store faces from other distribution channels is reflected in the commission rates charged by Google Play Billing.[550] It is possible that the some of the fee reductions might have been in response to similar reductions implemented by the App Store. However, as set out above, prices can also be affected by factors unrelated to competition and so such price changes may therefore not be the outcome of competitive pressure. Furthermore, other evidence in relation to the commission fees is consistent with the Play Store facing limited competition:

(a) A range of app developers indicated that the level of commission fee rates on the Play Store are too high[551] and only some[552] indicated that they felt the rates were fair.[553,554]

(b) We did not find evidence in Google's internal documents from 2022 to 2024 of Google monitoring Apple's fees or responding to competition from Apple in setting its own fees on Google Play Billing in the UK (consistent with no major changes to the Play Store's commission rates announced since 2021).

(c) This is also consistent with our profitability analysis set out in Chapter 8, showing that Google was and is expected to continue to make high profits and that Google is not being forced to erode those profits by responding to competition, eg through reductions in commission rates.

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[550] Google's response to section 69 notice [✂].

[551] 20 parties total. 19 responses to section 69 notices: [✂]. Note of meeting with [✂].

[552] 3 parties total. 2 responses to section 69 notices; [✂]. Note of call with [✂].

[553] In its response to the Proposed Decision, Google submitted that other evidence from app developers provides '[a] broader and more representative sample of app developer views and show that app developers consider Play's fee appropriate for the value provided', specifically referring to the MTM survey from June 2025. Google's response to Proposed Decision, paragraph 78. As discussed above, we do not consider that this survey represents a robust source of evidence. Furthermore, the survey does not appear to have asked developers for their views on the level of commission fees on the Play Store. Instead, the most relevant statement tested appears to be developers' views on whether the Play Store has helped them monetise their business. We do not consider the responses to this statement to be informative of app developers' views regarding commission fees on the Play Store and whether those rates are reflective of effective competition.

[554] Not all app developers we gathered evidence from in the course of this investigation gave explicit views on the level of the rates. Our approach to evidence gathering from app developers is set out in more detail in Appendix D. In its response to the Proposed Decision, Google submitted that the CMA distorted third party evidence by not recognising that some app developers submitted views that fees impacted their business and that fees were not impactful or relevant to their business (Google's response to Proposed Decision, paragraph 77). We do not agree that these wider views should be considered as relevant to the specific question of whether the fees are too high or not.

6.111 Overall, some evidence indicates that the Play Store's fees have fallen in the past, and that some of the fee reductions might have been in response to similar reductions implemented by the App Store. However, other evidence is consistent with the Play Store facing limited competition on fees. Google has not reduced the Play Store's fees since 2021 nor considered in its internal documents whether it should reduce the fees in order to compete for app developers. Therefore, we find that it is difficult to determine whether reductions in commission fees are driven by competition. Accordingly, we take broad account of this evidence in the round alongside other relevant evidence when considering competition for content providers.

Quality improvements and innovation for app developers

6.112 This section considers evidence on quality improvements and innovation to the service and features offered to app developers on Google's Play Store[555] and considers whether these are likely to have been driven by competitive pressure. We conclude that we cannot robustly infer what is driving such innovation: competition and/or other factors. Accordingly, we take broad account of this evidence in the round alongside other relevant evidence when considering competition for content providers.

6.113 As set out in the 'Competition for end-users: outcomes in terms of quality and innovation' section, outcomes relating to quality improvements and innovation can be a useful indicator of the extent of the competitive pressures. But as with other indicators, it is important to examine what is driving these outcomes. That driver could be competitive pressure; however, it is well established that other motivations - which are consistent with a lack of competitive constraint - may also spur the outcomes for end-users and app developers.[556]

6.114 As set out in the 'Competition for end-users: outcomes in terms of quality and innovation' section, Mobile Ecosystems are characterised by significant levels of innovation including quality improvements. This applies to Google's Mobile Platform.

[555] We note that there is not always a clear distinction between improvements aimed at app developers and end-users. There is therefore some overlap between the evidence considered here, and that considered in the 'Competition for end-users: outcomes in terms of quality and innovation' section.
[556] For example, even a monopolist may have incentives to innovate and improve quality, but the level might be lower and different in nature than in a more competitive market.

6.115 The evidence demonstrates that Google has implemented certain quality improvements to its Mobile Platform and particularly to the Play Store over time, with examples including [✂].

6.116 Google has submitted that these improvements reflect the competitive pressures:

(a) App stores and other distribution channels compete across a range of quality parameters such as opportunities for app developers to increase sales and distribution, safety of environment, trustworthiness of payments, and ease of use for consumers and app developers.[557] Furthermore, improvements to the Play Store for end-users may also improve the quality of the app store as a distribution tool for content providers, if it means end-users are more likely to find or download their apps. The Play Store's innovation rate demonstrates the strong competition it faces from Apple's App Store.[558]

(b) The Play Store faces intense competition from Apple's App Store[559] and its investments in innovations confirm the existence of strong competitive pressures.[560] Google's investments and innovations have led to increased value to users and app developers over time and provided examples of such innovations.[561] According to Google, [✂] is an example of the Play Store directly responding to competition from the App Store.[562]

(c) Innovations that seek to increase user engagement are driven by competition,[563] and Google does not discriminate in its innovation in the Play Store, and therefore innovations benefit all developers.[564]

6.117 We have considered the available evidence on the factors driving the observed improvements in quality and innovation. Several internal documents show Google benchmarking against the App Store and iOS as part of strategy

[557] Google's response to section 69 notice [✂].
[558] Google's response to Proposed Decision, paragraphs 57-58.
[559] Google's position paper [✂].
[560] Google's position paper [✂].
[561] Google submitted that globally it has launched more than [✂] products since January 2023 which are worth a combined [✂] in app developers' annual recurring revenue, including: advanced AI technologies to improve system's ability to proactively identify malware; AI-generated app review summaries; and a new pre-registration campaign to match higher value users with app developers. Submission from Google [✂]. Google's response to section 69 notice [✂].
[562] Google's response to section 69 notice [✂].
[563] Google's response to Proposed Decision, paragraph 59.
[564] Google's response to Proposed Decision, paragraph 60.

documents or product plans for the Play Store.[565] This indicates that competition for app developers could be a factor driving quality improvements and innovations.

6.118 However, other internal documents suggest that innovation is being driven by [✂].[566] Although improvements aimed at helping developers increase revenue by increasing user engagement or ability to monetise could be consistent with attracting developers to the Play Store, they could also be motivated by increasing revenue from existing developers.

6.119 Therefore, similar to our view above in relation to improvements to quality for end-users (see section 'Competition for end-users: Outcomes of competition in terms of price and quality'), there are factors other than competition which could be driving Google's improvements to its Mobile Platform for app developers, for example increasing revenue earned from existing app developers through improved analytics tools for developers, or improving their ability to monetise users. Further, there is not always a clear distinction between improvements aimed at users and those aimed at developers, therefore some features which benefit developers may be driven by Google's incentive to increase revenue from existing users, for example by making it easier for users to make purchases through the Play Store.

6.120 Given the limitations in being able to assess whether the observed levels of innovation are indicative of Google facing significant competitive constraints, we have also considered third party evidence on quality.

6.121 In this regard, in response to the Proposed Decision, Google submitted that the CMA's assessment should take account of high levels of developer satisfaction,[567] in particular taking into account the MTM survey from June 2025,[568] which shows that app developers consider that the Play Store provides significant value.[569]

6.122 We have assessed the MTM survey highlighted by Google and our view is as follows:

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[565] A document [✂] describes [✂], [✂]. A document [✂] similarly notes [✂], [✂]. A document [✂], discusses [✂]. A document [✂] describes [✂]. One document notes [✂]. [✂].
[566] Two documents describe [✂], with one describing [✂] and [✂]. A document prepared for the [✂] dated December 2023, describes [✂]. A document [✂]. A document [✂], describes how [✂].
[567] Google's response to Proposed Decision, paragraph 59.
[568] MTM, 'UK developer attitudes towards app stores', accessed by the CMA on 10 October 2025.
[569] Google's response to Proposed Decision, paragraph 78.

(a) The survey assesses developers' levels of satisfaction across a range of factors, such as an overall aggregate level of satisfaction, the value the Play Store offers compared to developers' investments, and the value that the Play Store's resources provide.

(b) However, we assess that it is unlikely to be a robust source of evidence. This is broadly because (i) it is unlikely to be representative of the UK developer population, and (ii) it is not possible to test for bias in the formulation and delivery of the survey as no questionnaire is available.

(c) Further, as described above in the 'Outcomes of competition for end-users' section, evidence on reported consumer, or in this case developer, satisfaction, may not in isolation be conclusive on the level of competitive constraint faced by Google's Mobile Platform.

6.123 We have also reviewed third-party evidence which suggests that overall there are material concerns amongst app developers regarding the quality of services on the Play Store. Some third parties suggested that there may be some competition on quality between Google's Play Store and Apple's App Store,[570] and some stated that the Play Store does bring benefits to app developers, for example in terms of discoverability[571] and user trust.[572] However, a range of native app developers[573] submitted to us that they have concerns in relation to how Google operates the Play Store, and these concerns relate to several key aspects of app distribution, such as app discoverability, listing or updating apps, and Google's use of app developers' data. The significant level of concerns raised by a range of app developers in relation to key aspects of app distribution on the Play Store is consistent with there being limited competition between Apple and Google on quality to attract app developers.[574]

[570] Apple provided several examples which it submitted show that Google has responded to improvements introduced on the App Store, for example, by launching the Android Excellence program in 2017 which allows showcasing high quality apps and games and introducing a new feature to weight app ratings to favour more recent app releases in 2019. Apple's response to section 69 notice [✂]. Two other third parties (industry associations) submitted views that the Play Store faces strong competition on quality from the App Store. Parties responses to invitation to comment dated 23 January 2025; Chamber of Progress (pages 1,2 & 4); Communications Industry Association (page 3). It's important to note that both Apple and Google are members of the Chamber of Progress (Partners - Chamber of Progress) and Communications Industry Association (Members - CCIA).

[571] 6 parties responses to section 69 notices; [✂].

[572] For example see 3 parties responses to section 69 notices; [✂].

[573] 22 parties responses to section 69 notices; [✂]. 2 notes of meetings; [✂].

[574] In response to the Proposed Decision, Google submitted that this was based on a 'self-selecting sample' (see Google's response to Proposed Decision, paragraph 66.) Appendix D outlines our approach to gathering and assessing third-party evidence.

6.124 Further, where quality improvements and innovation are driven by competition, we expect to see at least some dynamic competitive fluctuations, driven by app developers' willingness and ability to switch to alternatives which have a superior offering. This does not appear to be the case here with the Play Store facing very limited constraints from Apple's Mobile Platform and limited competitive constraints from alternative app stores and other alternative ways of distributing content within its Mobile Ecosystem as well as non-mobile alternatives. We would also expect to see more evidence in internal documents of a market player monitoring others' performance and responding to other market participants' innovations, which again overall does not appear to be the case based on our review of Google's and Apple's internal documents.[575]

6.125 In light of the above, our view is that whilst it is likely that a degree of competitive pressure may create some incentive for Google to improve quality and innovate, other factors are also likely to be important drivers.

6.126 We conclude that whilst the evidence of quality improvements and innovation is relevant to our assessment, it is not clear what is driving such innovation: competition and/or other factors. Accordingly, we take broad account of this evidence in the round alongside other relevant evidence when considering competition for content providers.

Play Store's share of revenue across UK Mobile Devices

6.127 This section addresses Google's submissions in relation to Play's share of revenue across UK Mobile Devices. As we set out below, the evidence suggests that whilst the Play Store's shares of revenue from customer billings have declined, the Play Store's shares of overall revenue - which includes customer billings and advertising revenue have not declined (at least during the last two years). In addition, there is some evidence to suggest that the decline in the share of revenue from customer billings could be driven by Google's strategic decisions and other factors unrelated to competition and therefore such changes are not inconsistent with the Play Store facing limited competition. This and wider evidence set out below suggests that it is unlikely that competition is a significant driver of changes in the Play Store's relative performance.

[575] As described in Appendix D, as the only other significant provider of a Mobile Platform, we would expect to see at least some reference to Apple in Google's internal documents, and therefore do not conclude that Apple imposes a significant constraint based on the relatively limited references we have seen.

6.128 Google submitted that: (i) the Play Store's revenue share of around 25% across all UK Mobile Devices that is falling is reflective of the competitive pressure on the Play Store;[576] (ii) the Play Store's share of supply in app stores – and particularly its shares of revenue from customer billings - is highly relevant to and should be used as a starting point of the SEMP assessment;[577] (iii) the Play Store's low and falling share in customer billings is relevant for the SEMP assessment, given that the CMA is required to conduct a five-year forward-looking assessment, taking into account expected or foreseeable developments such as trends in the market;[578] and is also inconsistent with any suggestion that Play could have SEMP on the basis of a forward-looking assessment.[579,580]

6.129 Contrary to Google's submission, we do not consider that the Play Store's shares of revenue from customer billings across all Mobile Devices in the UK are on their own informative of the competitive constraint that the Play Store faces in competing for users and app developers, nor that this figure represents the most pertinent share of supply.[581]

6.130 First, the vast majority of revenues from end-user billings are accounted for by Apple's App Store and the Play Store. However, the 50-60% of UK mobile users who use Apple's Mobile Platform cannot choose to access content via the Play Store and therefore do not see the Play Store and the App Store as substitutes.[582] Furthermore, as discussed above, app developers must make their content available on both Google's and Apple's Mobile Platforms in order to access all users in the UK and, as such, they do not perceive those two platforms as substitutes. Changes in Google's share of revenues from customer

[576] Submission from Google [✂]. Google's response to Proposed Decision, paragraph 61.
[577] Google's submission [✂].
[578] Google's response to Proposed Decision, paragraph 62. Google's submission [✂].
[579] Google's response to Proposed Decision, paragraph 62.
[580] Google further submitted that Apple's mobile devices have an increasing share of younger users, citing evidence from its internal documents and the Accent Consumer Survey to support this. Google submitted that this trend will exacerbate the Play Store's declining share of net revenue in app stores in future because [✂]. The Accent Consumer Survey also shows that iOS smartphones were used more frequently in younger age bands, such that those aged 16-34 were significantly more likely to have iOS phones than those aged over 35 years old. We consider this evidence does not, however, suggest that Apple's overall share of mobile devices in the UK is increasing. This is because it is not sufficiently clear from this evidence that these younger users will remain iPhone users over time and it is not sufficiently clear from this evidence whether the proportion of users in this age bracket who use iPhones is increasing over time. Additionally, our analysis of overall shares of supply (see section 'Overall shares of supply') of Mobile Ecosystems finds that Google has had persistently material and stable shares of supply over time, and we do not anticipate significant change to these shares of supply over the next five years. Sources: Submission from Google [✂]. Google internal document [✂] and Accent Consumer Survey, page 12 and Figure 2.
[581] Submission from Google [✂].
[582] Unless they were to switch to Google's Mobile Platform and, as we explain above in the section 'End-user switching between Apple and Google Mobile Platforms, such switching is limited.

billings are therefore unlikely to be significantly driven by competition between the app stores (as also discussed below).

6.131 In addition, the vast majority of app developers on the Play Store primarily fund their apps through advertising, which directly contributes to the Play Store's advertising revenue. Therefore, both revenue based on customer billings and advertising revenues are relevant for the assessment of the relative performance of the Play Store. As such, we disagree with Google's submission that the Play Store's share of revenues from customer billings is '[✂]' [583] because shares of revenue in customer billings provide only a partial view of the relative performance of the Play Store.

6.132 Whilst evidence suggests that the Play Store's share of net revenue solely from customer billings has decreased over time, a range of other measures of shares do not suggest that its overall relative performance has been declining over time:

(a) Our analysis shows that when considering all Mobile Devices in the UK, Google's Play Store's share of net revenue from customer billings decreased from [✂] [30 – 40]% in 2020 to [✂] [20 – 30]% in 2024; and that the share for Apple's App Store increased from [✂] [60 – 70]% to [✂] [60 – 70]% in the same period.[584] The most significant year on year change in shares is observed in and around 2021, coinciding with the timing of the reductions to the commission rates implemented by Google; there have been no reductions in commission rates since then.[585]

[583] Google submitted that the Play Store's share of revenues from customer billings is '[✂]' given it represents Play's share of transactions (by value). Submission from Google [✂].
[584] Analysis of data from market participants based on Google's response to section 69 notice [✂]. Google's response to section 69 notice [✂] Apple's response to section 69 notice [✂]; Samsung's response to section 69 notice [✂]; Amazon's response to section 69 notice [✂] and Huawei's response to section 69 notice [✂]. See Appendix A.
[585] As set out in Appendix A, the Play Store's share of revenue from customer billings decreased from [✂] [30 – 40]% in 2020 to [✂] [30 – 40]% in 2021 and then to [✂] [30 – 40]% in 2022.

(b) However, the Play Store net revenue from customer billings has been steadily growing in absolute terms and has grown by [✂] since 2020,[586] but at a slower rate compared to the App Store.[587,588]

(c) Furthermore, when advertising revenues are accounted for, Play Store's overall revenue shares appear stable in the last two years.[589] The Play Store's share of native app downloads across all the UK Mobile Devices has also been stable since 2020 (ranging from [✂] [50 – 60]%). This is consistent with the evidence discussed below indicating that the number of active users and app developers on the Play Store has been also generally stable. As explained in section 'Role of third-party OEMs', Google's main source of revenue comes from selling digital advertising, primarily search advertising.

6.133 Furthermore, there is evidence showing that factors unrelated to competition may be impacting the dynamics in the Play Store's net revenue from customer billings, including evidence at least in part explaining why it grew at a slower rate compared to the App Store and hence why the respective share for the Play Store decreased whilst that for the App Store increased.

(a) The Play Store growing at a relatively slower rate compared to the App Store is consistent with the evidence discussed above in section 'Quality and innovation for app developers', that Google is [✂] in terms of its ability

[586] Google's response to section 69 notice [✂]. Google's response to section 69 notice [✂].
[587] For example, over the period from 2023 to 2024 on mobile devices in the UK, the Play Store's net revenue from customer billings grew by [✂] [10 – 20]% whereas its revenue from customer billings and advertising on the Play Store grew by [✂] [20 – 30]%. In comparison, the App Store's net revenue from customer billings grew by [✂]% over the same period (from £[✂] [0 – 2] billion in 2023 to £[✂] [0 – 2] billion in 2024) and its revenue from customer billings and advertising on the App Store grew by [✂]% (from £[✂] [0 – 2] billion in 2023 to £[✂] [0 – 2] billion in 2024).
[588] In response to the Proposed Decision, Google submitted that an increase in net revenues is not identified as evidence of SEMP in the DMCCA, the Guidance, or case law on market power (see Google's response to Proposed Decision, paragraph 62). We agree that such evidence in and of itself is not indicative of SEMP. However, this evidence provides a relevant context for understanding the drivers behind the decline in the Play Store's shares of revenue from customer billings. As set out above, in this section we assess evidence of the outcomes and their role in the overall question of competition for app developers, bearing in mind throughout the drivers of such outcomes.
[589] The Play Store's share of revenue when factoring in ad revenue was [✂] [30 – 40]% in 2023 and 2024, compared to [✂] [30 – 40]% in 2023 and [✂] [20 – 30]% in 2024 when only considering revenue from customer billings. The Play Store's shares inclusive of ad revenue might be overstated as we have not gathered ad revenue from alternative app store providers Samsung, Amazon, and Huawei, however, we do not expect this to be significant given those alternative app stores combined account for [✂] [0 – 5]% of revenue from customer billings for this period. Data provided by Google on revenue generated by the Play's Store's adverts covered the period 2023-2024. Analysis of data from market participants based on Google's response to section 69 notice [✂]. Google's response to section 69 notice [✂]. Google's response to section 69 notice [✂]. Apple's response to section 69 notice [✂]. Apple's response to section [✂]. Samsung's response to section 69 notice [✂]. Amazon's response to section 69 notice [✂] and Huawei's response to section 69 notice [✂].

to monetise existing developers and users and that therefore the relative performance of the Play Store compared to the App Store (and hence, Play Store's decreasing share of revenue from customer billings) could be driven by factors other than competition.

(b) Some internal documents from Google suggest that it has been [✂] its revenue on Play Store since 2018, [✂] where the Play Store has [✂] enabling app developers to [✂].[590] Some internal documents also explain that [✂]; and that the Play Store will also seek to [✂] by [✂].[591] These documents imply that [✂].

(c) Consistent with this, some Google internal documents show that the proportion of revenue on the Play Store from ads has approximately [✂] in 2018 to [✂] in 2024 and allowed the Play Store to maintain [✂], [✂].[592] This is also consistent with analysis in Appendix A which shows that the Play Store's ad revenue [✂]% in 2024 alone.[593]

(d) Finally, one document notes that the growth rate of the Play Store's net revenue from customer billings, particularly in 2020 to 2022, could have been affected [✂][594] [✂].[595]

6.134 In addition, if shares of revenue in customer billings were largely driven by constraints faced by the Play Store, we would expect to see evidence that such decline was linked to competition, for example, users or app developers switching away from the Play Store, or users diverting spending away from the Play Store. However, the evidence discussed elsewhere in this chapter and in Chapter 7 does not suggest that competition is a significant driver of the decline in shares of revenue we observe. Specifically:

(a) The evidence does not suggest that the Play Store is facing a constraint from app developers switching to the App Store meaning that this is unlikely to materially contribute to the observed fall in Play Store's shares

[590] Google internal document [✂]. Google internal document [✂]. Google internal document [✂].
[591] Google internal document [✂]. Google internal document [✂].
[592] Google internal document [✂]. Google internal document [✂]. Google internal document [✂].
[593] The Play Store's ad revenue [✂] from [✂] in 2023 to [✂] in 2024. See Table A.10 in Appendix A.
[594] For example that document notes [✂].
[595] The document notes [✂].

of revenue in Appendix A.[596] In addition, as discussed above, the evidence does not indicate that this is likely to change significantly in the next five years.

(b) As discussed above in the section 'Competition for end-users', Google's shares of supply remained relatively stable, including in the premium segment. We do not therefore consider that the decline in the Play Store's revenue shares can be attributed to significant users' switching to Apple's Mobile Ecosystem, and in particular, significant switching by users in the premium segment.[597] Furthermore, to the extent that such switching does occur,[598] it does not appear to be driving any material decline in the Play Store's user base[599] or in its shares of user downloads, as discussed above. In addition, end-users' switching does not appear to be driven by factors such as range and quality of apps.[600] Therefore, such switching is unlikely to put pressure on Google to improve its offering on the Play Store along those parameters.

(c) Finally, we do not consider that the decline in the Play Store's share of revenue is significantly driven by effective competition from within Google's Mobile Ecosystem and from off-mobile alternatives. As set out in Chapter 7, the Play Store faces limited competitive constraints from alternative app stores and other alternative ways of distributing content within its Mobile Ecosystem. We also find that, whilst the ability of users to make purchases on non-mobile platforms provides some competitive constraint on the Play Store, this represents only a partial constraint for a sub-set of app developers and for certain users. The evidence does not indicate that this is likely to change significantly over the next five years.

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[596] As set out in Appendix A, the average annual number of app developers on the Play Store has been steadily increasing in the period from 2020 to 2023. As set out in Appendix A, that number dropped in 2024 in part due to [✂]
[597] Google explained to the CMA that the Play Store has experienced a falling share of revenue relative to Apple due to some of the 'premium high-value users' moving from Android to iOS, for which 'developers care about these users more than the average user'. It further explained that high-value customers generate more revenue and Apple is increasingly winning the premium users. Google, Oral Representations transcript, [✂].
[598] As set out above in the section 'Assessing competition for different customer groups', even if users with premium devices are typically more likely than those with cheaper devices to switch to Apple, switching is still limited and most premium users do not even consider switching Mobile Platform.
[599] As set out in Appendix A, the number of daily active users on the Play Store remained reasonably consistent throughout the period from 2022 to 2024.
[600] Our consumer survey found that: (i) 12% of users who switched to a smartphone priced £601-900 cited 'I thought [iOS/Android] had access to a wider range of mobile apps/the apps I wanted to use' as a reason for switching (8th most popular reason cited); and (ii) 14% of users who switched to a smartphone priced £900+ cited 'I thought [iOS/Android] had access to a wider range of mobile apps/the apps I wanted to use' as a reason for switching (10th most popular reason cited). Accent Mobile Consumer Survey, Technical Use and Behaviour Data Tables, Q23.

6.135 Overall, whilst it is difficult to precisely determine what is driving the decline in the Play Store's shares of revenue from customer billings, there is some evidence to suggest that those changes in shares could be driven by Google's strategic decisions and other factors unrelated to competition. Therefore, such changes in the Play Store's relative performance in terms of customer billings are not inconsistent with the Play Store facing limited competition. There is also evidence suggesting that the Play Store's shares of overall revenue which includes customer billings and advertising revenue have not declined (at least during the last two years). We therefore consider it is unlikely that competition is a significant driver of changes in the Play Store's relative performance.

6.136 Furthermore, we consider that the evidence of Play Store's falling shares of revenue from customer billings does not demonstrate that the Play Store's market position is likely to change significantly over the next five years. As we explain above, the Play Store's shares of supply, based on user downloads or overall revenues, have remained stable over the last two years. This and wider evidence discussed above does not, therefore, suggest that these shares will significantly decline over the next five years.[601] In addition, to the extent that the Play Store's share of revenue from customer billings may continue to decline, this may at least in part be driven by factors unrelated to competition as discussed above. This assessment is consistent with evidence set out in Chapter 8 which suggests that a significant impact on the position of Google's Mobile Platform as a whole (eg due to a combination of factors) is not likely over the next five years.

Competition from other Mobile Platforms to attract app developers

6.137 We find that Google's Mobile Platform faces a very limited constraint from non-Apple Mobile Platforms, including from Amazon's Appstore (on Fire OS) and Huawei's AppGallery, to attract app developers:

(a) As set out above, app developers consider both Google's and Apple's Mobile Platforms as 'must-have' and distinct distribution channels and, as such, app developers switching or threatening to switch to other rival Mobile Ecosystems are unlikely to impose a significant constraint on Google.

[601] As set out above in the section 'Assessing competition for different customer groups', the evidence does not suggest the premium segment is growing over time in the UK, such that it would impact our conclusions on a forward looking basis.

(b) No app developer we gathered evidence from suggested they would prioritise distributing their native apps on non-Apple Mobile Platforms and only a small number of app developers identified app stores on these platforms - ie Amazon's Appstore[602] and Huawei's AppGallery[603] as options they actively use with some of those app developers submitting that they consider them as complements to the Play Store.[604]

(c) Both Amazon's Appstore and Huawei's AppGallery have significantly smaller user bases and generate significantly less net revenue from customer billings,[605] indicating that for app developers, these app stores act as inferior substitutes to the Play Store.

(d) We have seen no mention of Amazon's Appstore (on Fire OS)[606] or Huawei's AppGallery in Google's internal documents from the last three years.

Competition from Apple's Mobile Ecosystem to attract web developers

6.138 In this section we consider the extent to which Google's Mobile Platform faces competition from Apple's Mobile Ecosystem to attract web developers.

6.139 In relation to web content, web developers write content once for distribution across different platforms (eg the Apple and Android mobile operating systems), devices (eg mobile, desktop, or console), and browsers (eg Chrome, Safari, Firefox etc).[607] Content providers therefore do not choose whether to distribute on one platform or another, as by its nature web content is broadly available. As a result, web content providers cannot 'switch away' from either Mobile

[602] 7 total parties. 5 responses to section 69 notices; [✂] 2 notes of meetings; [✂].
[603] 2 responses to section 69 notices; [✂].
[604] 5 total parties. 3 responses to section 69 notices; [✂]. 2 notes of meetings; [✂].
[605] Amazon's Appstore on Mobile Devices had an average monthly number of [✂] [0 – 1] million active users and generated approximately £[✂] [0 – 50] million in net revenue from customer billings in 2024. Amazon's response to section 69 notice [✂]. Huawei's AppGallery on Mobile devices had an average monthly number of [✂] [0 – 1] million active users and generated approximately £[✂] [0 – 50] million in net revenue from customer billings in 2024. Huawei's response to section 69 notice [✂]. This compares against [✂] [20 – 30] million monthly active users on the App Store which generates £[✂] [0 – 2] billion of net revenue from customer billings on Mobile Devices in 2024. Apple's response to section 69 notice [✂].
[606] We discuss evidence related to Amazon's Appstore on Android separately, in the following chapter.
[607] Jigsaw Research (2024), Qualitative Research with Developers on Mobile Browsers and Mobile Browser Engines, page 5.

Platform, and Apple, Google and other rivals therefore do not compete for web content to be made available on their Mobile Platforms.[608]

6.140 In limited circumstances, compatibility issues mean that web content may not work as intended with certain browsers or browser engines.[609] However, web developers have indicated that they tend to test for compatibility against the browsers with the most users and therefore both Chrome and Safari are prioritised:

(a) Compatibility issues could impact the quality of web content available on a platform. For example, if Blink encountered significant web compatibility issues, this would reduce the quality of web content accessible on Google's Mobile Platform. Mobile Platforms may therefore compete to be prioritised by web developers for compatibility testing, which would reduce the risk of compatibility issues arising on the platform.

(b) Internal documents from Apple and Google indicate that compatibility is important for their browsers, with developer views being considered, and targets being set for compatibility.[610]

(c) Web developers have indicated that they tend to test for compatibility against the browsers with the most users. This means that they mainly test against Chrome and Safari, and to a lesser extent smaller less popular browsers such as Firefox, Edge, and Brave.[611] The evidence also indicates that compatibility issues with browsers are less frequent than in the past, and any issues tend to be minor.[612]

(d) Any competition to be prioritised for compatibility testing is therefore in the form of having more users of the browsers and browser engines on a platform. Given the significant number of users of Safari and WebKit, and

[608] Although mobile browser and browser engine providers do develop new functionalities which can be used by web developers, to the extent that this is linked to competition, we consider that this is more likely to be linked to competing for users, by increasing the quality of web content available on their mobile browser or browser engine, rather than the threat of web developers switching.
[609] See Apple's response to section 69 notice [✂]; and Google's response provided in the context of the CMA's MBCG MI to section 174 notice [✂].
[610] An Apple document, provided in the context of the MBCG MI [✂], the document reports it is [✂]. Apple's internal document, [✂]; [✂]. Apple's internal document, [✂]; An Apple email provided in the context of the MBCG MI also mentions [✂]. A Google document states that one of Google's motivations for having good quality technology stacks (ie the combination of technologies required to build a website) is so that [✂].
[611] Jigsaw Research (2024), Qualitative Research with Developers on Mobile Browsers and Mobile Browser Engines, page 7; See Appendix A for more detail on shares of supply in mobile browsers.
[612] Jigsaw Research (2024), Qualitative Research with Developers on Mobile Browsers and Mobile Browser Engines, pages 8 and 25.

Chrome and Blink, both tend to be prioritised by web developers for compatibility testing, although there is some evidence of Safari and WebKit having greater issues with compatibility.[613]

6.141 Consequently, our conclusion is that the extent of any competition between Apple and Google to ensure that web content providers make their content available on Apple's and Google's Mobile Platforms respectively is very limited, as web content is generally made available cross-platform. To the extent that there is competition, this is in the form of having more users and therefore being prioritised by web developers in compatibility testing. Additionally, the evidence does not indicate that this is likely to change significantly over the next five years.

Conclusions on competition to attract content providers

6.142 We conclude that Google's Mobile Platform faces very limited competitive constraint from other Mobile Ecosystems to attract content providers:

(a) With respect to app developers:

(i) Each of Google's Mobile Ecosystem and Apple's Mobile Ecosystem serves a large and distinct group of users (consistent with our conclusions that these platforms have a different focus when competing for users) and we find the evidence shows both are considered by app developers as 'must-have' distribution options to access those user groups. Similarly, we find that app developers are unlikely to delist or generally deprioritise their listings on Google's Mobile Platform or otherwise generally prioritise developing content for Apple's Mobile Platform (other than for a limited period of time).

(ii) We have considered evidence on outcomes in terms of commission fees, innovation and revenue shares and found that the observed outcomes could be consistent with some competition but could also be driven by factors unrelated to competition. We find that reductions in commission fees in the past may have been in response to similar reductions implemented by the App Store. However, wider evidence is consistent with the Play Store facing limited competition on fees. We consider the evidence shows Google has made improvements to

[613] MBCG MI Final Decision Report, Appendix A, paragraph 4.

its Mobile Platform over time. However, there is also evidence that this could be driven by its desire to increase revenues from existing app developer and users. Finally, we find that the decline in the Play Store's share of revenue from customer billings may be driven by Google's strategic decisions and it is unlikely that competition is a significant driver of such changes.

(iii) When considering all the above evidence in the round, we find that there is very limited competition between these two key platforms for attracting app developers.

(b) With regard to web content, this is made broadly available by content providers and, as a result, competition between Apple's Mobile Platform and Google's Mobile Platform for these content providers is very limited.

(c) We also find that smaller non-Apple Mobile Ecosystems provide a very limited constraint on Google's Mobile Platform when competing for content providers.

(d) Finally, the evidence we have seen does not suggest that the above findings are likely to change significantly over the next five years. This is consistent with our findings elsewhere in this report that, based on the evidence we have seen, market, technological, regulatory or other developments are unlikely to change significantly Google's position in terms of competition for content providers over the next five years (see sections titled 'Competition to Google's Mobile Platform arising from wider technological, market, regulatory and other developments' in Chapter 8).

Impact of Google's revenue sharing agreement with Apple

In this section we consider the revenue sharing agreement (known as the information sharing agreement) **the ISA**)) between Google and Apple and the extent to which it limits Google's and Apple's incentives to compete against each other.

We find that the ISA materially limits Apple's and Google's incentives to compete, and this dampens the extent of competition between Google's Mobile Ecosystem and Apple's Mobile Ecosystem.

6.143 Google and Apple have an agreement known as the Information Services Agreement ('**ISA**') which was first entered into in 2002. Under the current terms of the ISA:

(a) Apple sets Google Search as the default search engine on the Safari, Siri and Spotlight search access points on all Apple devices (including Apple Mobile Devices) in several territories including the UK, European Economic Area (**EEA**) and US.[614]

(b) In return, Google pays Apple a significant amount of its search advertising revenue for searches conducted via Google Search on Apple devices (including Apple Mobile Devices) in several territories including the UK, EEA and US, using Apple's Safari, Siri and Spotlight and Google's Chrome browser. In 2022, this amounted to USD 20 billion globally.[615] In the UK, Google paid Apple approximately £[✂] [1-3] billion under the ISA in relation to search access points on Safari, Chrome [✂] across all Apple Mobile Devices in 2024.[616]

6.144 The ISA has significant commercial and strategic importance to both firms. For Apple, the scale of Google's payments under the ISA makes Google one of Apple's largest sources of revenue and profits.[617] For Google, the CMA's Search SMS Investigation found that Google's default agreements including the ISA create a significant barrier to entry and expansion to rivals of Google's general search products – as such, these agreements play an important role in supporting Google's highly profitable position in search.[618] In the US Search Litigation, Sundar Pichai, CEO of Alphabet, confirmed that default placements –

[614] MBCG MI Final Decision Report, paragraphs 9.1 to 9.5 and 9.48; CMA's Decision to designate Google's as having SMS in general search services, paragraph 5.92 and 5.173; [✂].
[615] MBCG MI, paragraph 9.1 to 9.4; Google's response to section 69 notice [✂], and Apple's response to section 174 [✂]. Under the ISA, Google pays Apple a significant percentage of its net advertising revenue from traffic that takes place via Safari and Chrome. (MBCG MI Final Decision Report, paragraph 9.4).
[616] See the CMA's Decision to designate Apple with strategic market status in respect of its Mobile Platform, Appendix B.
[617] See the CMA's Decision to designate Apple with strategic market status in respect of its Mobile Platform, Appendix B.
[618] The ISA allows Google to ensure that Google Search is used on the large majority of mobile devices in the UK because it is set as the default search provider on Safari which has c.43% share of browser usage on mobile devices in the UK and is used extensively on Chrome which accounts for further c.46% share of mobile browser usage in the UK (see Appendix A for details). The importance of default positions and the impact of these on competition in general search is discussed in SMS Final Decision in respect of Google's general search services, section titled 'User access and default positions' (in particular, see paragraph 5.177 to 5.186). Also, see Appendix B for our analysis of Google's revenues and profits from mobile search advertising.

including on iOS Mobile Devices via the ISA – are valuable to Google despite costing billions of dollars a year.[619]

6.145 We consider that the mutually beneficial, commercially and strategically important relationship created by the ISA is likely to dampen any competition between Apple's and Google's Mobile Platforms which would risk disrupting that relationship. Specifically, we consider that the ISA particularly limits the scope for dynamic competition between these two platforms given that the ISA reinforces the important differences in Apple's and Google's overarching revenue models[620] and limits Apple's and Google's incentives to introduce innovations that may disrupt existing differentiation in business focus. Limited constraint from Apple's Mobile Ecosystem is likely to be particularly detrimental given that it is the main source of constraint that Google's Mobile Ecosystem faces, with very limited constraints from alternative Mobile Ecosystems (as set out elsewhere in this Chapter).

6.146 In addition to the above dynamic impacts, the terms of the ISA limit the financial benefit that Google derives from both retaining a mobile user on its Mobile Ecosystem or winning such a mobile user from Apple. Specifically, the terms of the ISA which result in Google being set as the default on a number of access points on Apple devices mean that, if an Android end-user using Google Search switches to an Apple mobile device, Google is likely to retain that user as a user of Google Search[621] and can retain material search revenue from that user (as discussed below). Further, where a user within Apple's Mobile Ecosystem already uses Google Search, the incremental revenue Google earns from winning such users to its own Mobile Ecosystem is limited. Considering that

[619] Reuters, 'Google CEO acknowledges importance of being default search engine in US trial', 31 October 2023, accessed by the CMA on 26 September 2025.
[620] There are important differences in Apple's and Google's overarching revenue models, whereby Apple makes the majority of its Mobile revenue from device sales (Apple, 'Form 10-K for Apple filed 1 November 2024', accessed by the CMA on 8 October 2025, page 35), and Google makes most of its Mobile revenue from services, including search and other advertising (as set out in Appendix B, section titled 'Global revenues and operating profits'). Furthermore, as set out above in section 'Extent of differentiation with Apple's Mobile Platform', Apple focuses on offering a tightly controlled and integrated Mobile Ecosystem and delivering a secure and polished user experience to support selling high quality devices; whereas Google's primary focus is to support its advertising business by building and maintaining a very large user base with devices using Google's Mobile Platform offered via third party OEMs across a range of needs and budgets. As such, Google's reliance on advertising revenues and limited presence in mobile devices (via Pixel) means that users' spend on acquiring Android devices has a much less direct impact on Google's revenues compared to Apple (which generates the majority of its Mobile revenue from users on Apple's mobile devices). The ISA reinforces that because its terms ensure that Google can earn consistently high revenues in search advertising (by securing key user access points for Google Search on iOS) without having to win mobile users away from Apple's Mobile Platform.
[621] This is because end-users rarely change the preset default. For more detail see the CMA's Decision to designate Google's as having SMS in general search services, 'User access and default positions' section (in particular, paragraph 5.182).

revenue from mobile search (including through the ISA) accounts for the majority [✂] of Google's mobile revenues in the UK,[622] we consider that these static impacts of the ISA materially limit Google's incentives to compete for mobile users and therefore the constraint it exerts on Apple's Mobile Platform. Furthermore, in the dynamic context, this may also dampen the extent of the constraint that Apple exerts on Google's Mobile Ecosystem, as Apple will respond to the limited competitive constraint from Google (which, as discussed elsewhere in this chapter, is the main competitive constraint Apple faces).[623]

6.147 In its response to the Proposed Decision, Google submitted that it has a strong incentive to compete against Apple's Mobile Ecosystem. We have considered these submissions but remain of the view that the ISA materially limits Google's incentives to compete:

(a) Google submitted a piece of analysis from Compass Lexecon which it said shows that Google 'earns substantially more revenues' from 'high-value' Android users relative to iOS users and therefore has 'an extremely strong incentive to win and retain users on Android'.[624] However, our view is not that the ISA removes entirely the financial incentive for Google to compete against Apple or that there is no constraint between the two but rather that the ISA materially limits Google's incentives to compete for mobile users against Apple's Mobile Ecosystem and that this dampens competition between them. Indeed, the evidence submitted by Google confirms that it earns material search revenue from Apple's iOS users, accounting for a significant proportion of revenue it would generate from a premium Android device user.[625]

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[622] See Chapter 8 section titled 'Mobile Search' and Appendix B section titled 'Search Ads & Other'.

[623] We note Apple's submission that the ISA payments may lead to increased gains that Apple can earn per user and hence provide it with an enhanced financial incentive to capture users from Google (Apple's response to the CMA's proposed decision to designate Apple as having SMS in respect of its mobile platform, paragraph 95). We understand this is because Apple may be able to generate greater revenue per user from search services as a result of Google's ISA-related payments. However, we note that Apple did not provide evidence to indicate how material it considers such impact on its financial incentives to be. More generally, we consider that any positive static impacts from Apple's enhanced financial incentives to capture users at a margin, to the extent they arise, are unlikely to offset the material wider dampening of dynamic competition between the two Mobile Ecosystems discussed above.

[624] Google's response to Proposed Decision, paragraphs 33 to 42 and submission from Google [✂].

[625] For example, a submission from Google [✂]. However, we do not consider that there is sufficient evidence to suggest that these estimates are [✂]. [✂] (Google's response to Proposed Decision, paragraph 37). We note, however, that some of the assumptions driving the estimates in its submission [✂] might overestimate the revenue differential, for example, because some of those estimates do not consider the incremental costs and revenues associated with selling [✂] which we have evidence to suggest are [✂] (see Appendix B section titled 'Pixel devices'). In addition, the estimates in its submission [✂] do not consider the impact of the cost differential Google faces; for example, the additional costs Google may incur from winning or retaining users on its Mobile Platform and how this compares to the costs of acquiring users (of Google Search) on Apple's Mobile Ecosystem.

(b) Additionally, Google submitted that it chose to launch Android in 2007 and Pixel and Pixel Watch as a direct competitor to Apple iPhones and watches, and this disproves the suggestion in the Proposed Decision that the ISA has in any way dulled Google's incentives to compete.[626] [627] Google further submitted that its Pixel devices were released to compete against iOS devices in the premium segment and to [✂].[628] Both of these objectives are reflected to a degree in Google's internal documents.[629] However, as noted above, our view is not that the ISA removes entirely the incentives for Google to compete for mobile users against Apple's Mobile Ecosystem but that those incentives are materially limited as a result of the terms of the ISA.[630] Consistent with that, Pixel devices do not appear to have exerted a strong constraint on Apple – while Pixel device sales are growing,[631] Pixel's share of UK mobile device sales has remained low, accounting for [✂] [0 - 5]% of active Android devices in the UK in 2024.[632] This is further reflected in documentary evidence from Apple and Google. For example, our analysis of [✂] indicates it is unlikely a Pixel launch will take share from Apple, and that the launch will be more concerning for rival Android smartphones.[633] Google internal analysis [✂] also shows that most Pixel users switch from other Android devices, not iOS devices.[634,635]

(c) Google further submitted that its incentive to compete with Android against iOS is strong because [✂].[636] We consider that while Google may [✂] on

[626] Google's response to Proposed Decision, paragraph 44 to 45.
[627] We note that Apple similarly submitted that even under the ISA, Google has substantial financial incentives to attract and retain users, including to its Pixel line of smartphones. Apple's response to Proposed Decision, paragraph 95.
[628] Google's response to section 69 notice [✂].
[629] Google's internal documents; [✂].
[630] In its response to the Proposed Decision, Google stated that the documents in Annex I show 'Google does everything it can to retain users on Android and are inconsistent with the claim that Google does not have a strong incentive to win users from iOS'. Note that we have considered these internal documents alongside other evidence and we conclude that Google's Mobile Platform faces limited competitive constraint from rival Mobile Ecosystems including Apple's when competing for end-users (see above the section 'Competition for end-users'). We also provide further information on our approach to assessing internal documents during this investigation in Appendix D. Google's response to Proposed Decision, paragraph 45. We consider this evidence to be consistent with our conclusions in this section that the ISA materially limits Google's incentives to compete.
[631] For example, see Google internal document [✂].
[632] See in the section above on 'Role of third-party OEMs'.
[633] [✂].
[634] Google internal document, [✂].
[635] This is further confirmed by an internal document from Google [✂]. Google internal document [✂].
[636] Google's confidential response to the Proposed Decision [✂].

Apple's Mobile Ecosystem, it nevertheless earns significant revenues from its services on iOS, such that our conclusions above still hold.

(d) Additionally, Google submitted that the revenue share payments under the ISA benefit Google's 'distribution partners, related markets, and consumers', [✂].[637] [638] To support this Google referred to the US DoJ *Search* judgment, which found that prohibiting Google's revenue share payments[639] risks 'fewer products and less innovation from Apple'. However, we note this statement related to potential unintended consequences of a remedy. On the substance, the judgment found that in principle such a prohibition would 'pry open the market to competition'[640] and encourage new entry in search services (including potentially from Apple). The judgment set out that the ISA provides[641] 'an incredibly strong incentive for the ecosystem to not do anything'. We consider the factual findings made in this judgment in relation to the ISA to be broadly consistent with our conclusions that the ISA dampens Apple's and Google's incentives to compete.

6.148 Finally, Google submitted that the analysis of substantial market power requires an assessment of the factual, not an assessment of the factual compared to a counterfactual, ie whether Google might face greater competition in an 'imaginary counterfactual' in the absence of the ISA.[642] As set out in Chapter 4, our analytical approach focuses on the competitive constraints that the potential SMS firm faces in respect of a digital activity, including for example evidence of substitutability, competitive rivalry and barriers to entry and expansion.[643] As part of our assessment, we have considered the extent of rivalry between Google and Apple, which is informed by the terms of the ISA.

6.149 We therefore conclude that the revenue sharing agreement between Apple and Google materially limits their incentives to compete in relation to their Mobile

[637] Google's presentation to the CMA [✂]; Google's submission to the CMA [✂].
[638] Additionally, while we agree that the ISA may in principle have some pro-competitive benefits referred to in the judgment, we note the judgment does not provide any indication of the size of these benefits including benefits for users in the UK. As such, we have no basis to conclude that any such potential benefits could offset the material impact on incentives to compete discussed above.
[639] Google's submission to the CMA [✂].
[640] *United States et al. v. Google LLC, State of Colorado et al. v. Google LLC,* Cases No. 20-cv-3010 (APM) and Case No. 20-cv-3715 (APM), page 120.
[641] *United States et al. v. Google LLC, State of Colorado et al. v. Google LLC,* Cases No. 20-cv-3010 (APM) and Case No. 20-cv-3715 (APM), page 120.
[642] Google's response to Proposed Decision, paragraph 46.
[643] Paragraph 2.63 of the Guidance.

Ecosystems. This reinforces the conclusions elsewhere in this chapter of the limited competitive constraint imposed on Google by Apple.

Barriers to entry and expansion in mobile platforms

In this section, we consider the extent to which Google is constrained by the threat of entry and expansion of competing mobile platforms. We considered four main categories of barriers to entry and expansion that a rival supplier of mobile platforms may face and find that Google faces limited constraint from the threat of entry or expansion occurring:[644]

- Indirect network effects which result from the fact that a mobile platform is two-sided, connecting users with content providers. We find that there are strong indirect network effects, especially for native apps, which act as a barrier to entry and expansion for rival mobile platform providers.

- Barriers to providing individual components of a mobile platform. As noted above, Google's Mobile Platform comprises interconnected components, namely: (a) a mobile operating system; (b) native app distribution; and (c) a mobile browser and browser engine. Therefore, in order to compete effectively with Google's Mobile Platform, a rival would need to be able to provide (either itself or by outsourcing to a third party) a version of each of these components, in which they are configured to work together. We find that some components of the mobile platform, such as the browser, are likely to be easier for a new entrant to provide than others.

- Barriers relating to Mobile Devices. A rival will also need Mobile Devices for its mobile platform to be installed upon. In other words, it would need to either produce its own Mobile Devices, or license its mobile platform to third-party mobile device OEMs. We find that a new entrant is unlikely to be able to replicate the payments Google makes to OEMs, and manufacturing its own mobile device is likely to require resources and expertise.

- Ecosystem-wide barriers. In addition to the barriers inherent in producing individual components of a mobile platform and the mobile device, there are additional barriers which apply at the mobile ecosystem level, such as getting users to switch from their

[644] We here assess the likelihood that a rival can enter or expand with a Mobile Platform like those of Apple and Google. The possibility of disruptive entry by a rival with a different offering or business model, potentially linked to technological developments such as AI, is covered in the section 'Competition to Google's Mobile Platform arising from wider technological and market developments' below.

existing mobile platform or replicating the broader ecosystem of integrated connected devices.

Indirect network effects

6.150 Mobile platforms exhibit strong indirect network effects which act as a barrier to entry and expansion. This is because, as set out in Chapter 4, a mobile platform is two-sided, connecting end-users with mobile content providers. The more end-users can access mobile content through the mobile platform, the more they value it. In turn, content providers value a mobile platform more the greater the number of end-users using it.

6.151 The presence of indirect network effects therefore creates a 'chicken and egg' problem where a mobile platform needs a critical mass of end-users to attract content providers, but it equally needs to offer a critical mass of mobile content to attract end-users. This means it is difficult for a new entrant to gain traction as it cannot attract one set of customers without the other.

6.152 A range of stakeholders, including Google, confirmed the importance of indirect network effects as a barrier to entry and expansion in mobile platforms:

(a) Google submitted that a mobile operating system's success depends on its ability to attract sufficient support from app developers, device manufacturers, and users.[645] [✂].[646]

(b) Microsoft, Samsung and Mozilla all submitted that their attempts to enter failed because they were unable to attract enough developers to create apps for their Mobile Platforms.[647] In addition, one of the reported reasons for the lack of success of Amazon's Fire Phone, which used Amazon's Fire OS and launched in the UK in September 2014 but exited a year later, was its narrow selection of apps, including its inability to offer the GMS suite of apps.[648]

(c) Third parties, including many major manufacturers of Mobile Devices and app store providers, confirmed that indirect network effects constitute a very significant barrier to entry. In particular, most third-party mobile device

[645] Google's response to section 69 notice [✂].
[646] Google's internal document, [✂].
[647] 3 responses to section 69 notices; [✂] from Microsoft [✂] from Samsung [✂]; [✂] from Mozilla, [✂].
[648] MEMS final report, June 2022, paragraph 3.56, footnote 109.

manufacturers and app store providers confirmed that network effects were an important feature of mobile platforms.[649] A number of app developers also confirmed this or submitted that the number of users they can reach influences where they choose to distribute their apps.[650] Most browser vendors submitted web compatibility can limit the ability of smaller browsers to grow.[651] Web compatibility generates an indirect network effect as web developers maintain compatibility with browsers with enough users, which limits smaller browsers' ability to grow.

6.153 The strength of these indirect network effects depends to some extent on the type of mobile content. In particular, there is a distinction between:

(a) Content that is consumed through native apps where many content providers develop their application specifically for use on a given operating system. As set out in the next chapter, in order to distribute its app via a new mobile platform, each individual app developer would need to substantially recreate its native app(s) for the operating system of the alternative mobile platform and incur significant development costs; and

(b) Mobile content that is consumed through a mobile browser or web-based applications where web developers need to create their content only once using web programming languages (ie common standards of the open web) and have it work across all consumer devices that can access the web through a web browser.[652,653]

6.154 We find that there are strong indirect network effects, especially for native apps, which act as a barrier to entry and expansion for rival mobile platform providers. We take this into account below in our assessment of the barriers to entry and expansion for each component and the mobile platform as a whole.

[649] Some OEMs are also app store providers. The count for number of app store providers therefore overlaps with the OEM count. 9 responses to section 69 notices; [✂]; [✂].
[650] 23 responses to section 69 notices; [✂]; One party's submission to the CMA [✂]; 4 notes of meetings; [✂].
[651] 5 responses to section 69 notices; [✂]; 1 response provided in the context of the CMA's MBCG MI; [✂].
[652] Although compatibility issues may result in some web content not functioning correctly with all browsers, we understand the vast majority of web content works with all browsers.
[653] Mobile browsers are themselves a type of native app which need to be written for each specific operating system, but a Mobile Ecosystem supplier could self-supply a mobile browser or would need only one third-party provider to make its mobile browser available on its mobile operating system, to allow end-users to access web-based content.

Barriers to providing individual components of a mobile platform

6.155 A new mobile platform would need to be able to offer each component of the platform, whether through developing its own software or accessing existing alternatives. Therefore, we consider in this section the barriers to providing a mobile operating system, native app distribution services, and a mobile browser and browser engine. Broader possibilities for entry and expansion by alternatives to these components (for example from AI) are considered in later sections.

Mobile operating system

6.156 A rival mobile platform would broadly have two options for supplying a mobile operating system: licensing an existing operating system or developing a new operating system.

6.157 Apple's iOS and iPadOS and Amazon's Fire OS are currently used exclusively as part of their own mobile platforms.[654] In response to the Proposed Decision, Google submitted that anybody can license the open-source Android operating system for free.[655]

6.158 While this is true, we note that in order to use the Android brand to market a device, OEMs must ensure that they comply with the Android Compatibility Commitment (**ACC**) under which OEMs agree to maintain compatibility with a baseline version of Android as set out in the Compatibility Definition Document (**CDD**).[656] This means that Android forks do not have access to Google's popular native apps including the Play Store, limiting the ability of new suppliers using an Android fork to offer a competitive rival mobile platform (see 'indirect network effects' section above).

6.159 In addition, it follows from our analysis that the agreements between Google and Android OEMs create substantial financial incentives for OEMS to (i) promote Google's apps and services on their Mobile Devices, and (ii) use a compatible version of the Android operating system, as Google's Placement Agreement and Revenue Sharing Agreement with OEMs is conditional on

[654] Apple's response to section 69 notice [✂] and Amazon's response to section 69 notice [✂].
[655] Google's response to Proposed Decision, paragraph 88.
[656] Google's response to Proposed Decision, paragraph 86. See also Brand guidelines | Google Play | Android Developers dated 21 July 2025, accessed by the CMA on 8 August 2025 and Android Compatibility program overview | Android Open Source Project dated 11 March 2025, accessed by the CMA on 8 August 2025.

OEMs joining the EMADA agreement which is in turn conditional on OEMs first having agreed to the ACC. This is covered in more detail in Appendix C.

6.160 Google submitted in response to the Proposed Decision that OEMs using a compatible version of Android can modify the operating system to an extent, such as by differentiating the user interface.[657]

6.161 However this is insufficient, in our view, to consider them as independent competitors to Google's Mobile Platform given the similarity in features and control Google can exert over the operating system by virtue of the various agreements.

6.162 Mobile operating systems are subject to strong indirect network effects (see 'Indirect network effects' section above) given their function as an intermediary between hardware and software on a mobile device. A successful mobile operating system therefore needs both a critical mass of end-users and content providers.

6.163 A significant portion of the costs involved in developing and maintaining a new operating system are fixed and do not vary with the number of users of the operating system, making it more difficult for a new entrant to compete against established operating systems with large numbers of users and therefore lower costs per user.[658]

6.164 In response to the Proposed Decision Apple and Google submitted that new entrants do not necessarily need to develop a mobile operating system from scratch due to the availability of open-source solutions (including Android where the source code is publicly available),[659] and using one of these existing open-source solutions can facilitate time and cost savings.[660]

[657] Google's response to Proposed Decision, paragraph 87.
[658] Apple submitted that it has invested billions of dollars in its mobile operating systems and that a portion of the costs are fixed (i.e. do not depend on the size of the user base). Apple's response to section 69 notice [✂] submitted that Android is the product of effort and investment. Google's response to section 69 notice [✂].
[659] Apple response to Proposed Decision, paragraph 97; and Google's response to Proposed Decision, paragraph 88. For example, Amazon entered the UK market with its own operating system (Fire OS) which was forked from Android.
[660] Google's response to Proposed Decision, paragraph 86 and 88; and Apple response to Proposed Decision, paragraph 97.

6.165 While we acknowledge that this is true, we note that Amazon submitted that its Android fork operating system still required investment.[661]

6.166 We therefore find that whilst a new mobile platform could use a forked version of Android, this would come without the Google suite of apps, limiting its success, and would still require investment.

Native app distribution

6.167 Native apps are the primary way that end-users consume content on their Mobile Devices and therefore being able to offer a wide range of native apps is important for a mobile platform to be attractive to users.[662] Native apps are most commonly accessed by users via an app store[663] and so as part of their offering, mobile platform providers will typically need to provide an equivalent app marketplace.[664,665]

6.168 We have considered the ease with which a new mobile platform provider could supply native app content, either by using an existing app store or developing its own app store.

(a) Native apps are written to run on a specific operating system: so a new mobile platform provider with its own operating system could not use an app store (or the associated catalogue of apps) from an existing mobile platform.[666] This might be less of an issue if the rival mobile platform provider were able to use one of the existing established operating systems. However, as set out above, options for this are limited.

(b) There are very strong indirect network effects related to native app distribution (as set out above): it is likely to be difficult for a new entrant to

[661] Amazon submitted that it had considered [✂]. It submitted that the total cost of developing and maintaining its Android fork FireOS, the devices that run it, and its native apps [✂]. Amazon's response to section 69 notice [✂].
[662] For example, in March 2023 users in the UK spent on mobile apps over five times the hours they spent on mobile web browsers. See Statista, 'UK time spent on browsers and apps 2023', accessed by the CMA on 12 September 2025.
[663] We note that an app store is required as it would be very difficult for one firm to develop a wide range of native apps themselves.
[664] In 2024 on Android mobile devices, there were approximately [✂] [1.5 – 2] billion first time downloads of native apps via an app store. This compares with approximately [✂] [200 – 250] million downloads via sideloading. We do not have data on usage of native apps that are pre-installed on mobile devices. Figures based on data from app store providers on Android. See Appendix A for further details. Google's response to section 69 notice [✂].
[665] For example, Apple's 'App Store', Google's 'Play Store' and the 'Amazon Appstore'.
[666] We understand that an operating system that has been forked from Android may retain some compatibility with Android apps but apps will typically not work or will only work with reduced functionality if they utilise Google APIs. This is the case for the majority of the most popular apps on the Play Store. [✂] response to section 69 notice [✂].

convince third parties to develop their apps for its nascent Mobile Platform which only has a small number of end-users.

(c) Apple and Google own a number of the most popular mobile apps and are able to restrict access to these apps: Google's first party apps, in particular, are among the most used mobile apps – for example in the UK in 2024, Google provided the top app on Apple Mobile Devices (by first time downloads) in the categories of [✂], and featured in the top 10 apps in other categories such as [✂].[667] A new entrant's competitive offering will be materially weakened if it is unable to offer these apps that are important for end-users.[668,669]

(d) A new entrant will incur material costs related to the development and ongoing operation of an app store: a significant portion of these costs are fixed and do not vary with the number of users of the app store, making it more difficult for a new app store to compete against established app stores, with large numbers of users and therefore lower costs per user, and who have already sunk these costs.

(e) As set out in Chapter 7, we do not consider that any of the alternatives to native app distribution via an app store (eg web apps) provide a viable substitute at present and the evidence does not demonstrate that this is likely to change significantly over the next five years.

6.169 We find that the main challenge is likely to be in getting app developers to develop their content for a new mobile operating system.

Mobile browsers and browser engines

6.170 Mobile browsers and browser engines are, alongside native apps, the main avenue through which end-users consume mobile content on their devices. A rival Mobile platform would therefore need to include a mobile browser (built on a browser engine) to allow users to access web content, either by gaining access to an existing browser or developing its own mobile browser.

[667] Apple's response to section 69 notice [✂].
[668] We note that Apple typically does not allow its first party apps to be used outside of its Mobile Ecosystem (with some exceptions including Apple TV, Apple Music and Move to iOS).
[669] For example, as set out in the 'Competition from non-Apple Mobile Platforms for end-users' section, Amazon's Fire OS does not have access to Google's suite of apps (available to Android compatible versions of its operating system through the GMS suite of apps) which materially weakens the strength of its tablet offering.

(a) The strength of the indirect network effects is more limited for web content: only one mobile browser needs to be developed as a native app to allow end-users to access all web-based mobile content. A rival mobile platform would therefore only need to persuade one or a small number of third-party browser providers to develop for its mobile operating system, or it could self-supply the browser. As set out in Chapter 7, there are various browser vendors that are active in the UK which a rival mobile platform may be able to partner with to provide a mobile browser eg through an upfront payment to cover the cost of porting the browser to a new operating system.[670]

(b) The costs related to developing a browser for use on the new mobile platform are likely to be relatively modest given the existence of open-source browsers and browser engines, and existing mobile browsers on other mobile platforms which could be adapted for the new operating system. Using an existing open-source browser engine eg Blink, WebKit, or Gecko, provides a relatively low-cost entry route for new mobile browser entrants.[671] The main cost for a new mobile platform entrant or rival (or, indeed, for a browser vendor operating on other platforms) would therefore be the cost of porting an existing open-source browser engine to the new operating system. Google submitted that it would need around [✂] [<20] full-time equivalent (**FTE**) engineers for a year to develop a competitive Blink-based version of Chrome for iOS, which it described as a [✂] investment.[672] This indicates that the cost of porting an existing browser and browser engine to a new operating system is relatively limited. We note that Amazon supplies its own mobile browser 'Amazon Silk' on its Amazon Fire tablets.

(c) As set out in the next chapter, developing and maintaining a browser engine involves much higher development costs. A new mobile platform entrant which wanted to develop its own browser engine, or substantially modify an existing one, would therefore incur greater costs. Whilst this would not be a necessity to enable users to access web content, it would

[670] Porting refers to the process of taking software developed for one operating system, and adapting it to work on another operating system.
[671] Apple's submission [✂]; Google's response provided in the context of the CMA's MBCG MI to section 174 notice [✂]. Google's response to section 69 notice [✂]. Google's response to the CMA's MBCG MI Working Paper 1, 3 September 2024, paragraph 39.
[672] Google's response provided in the context of the CMA's MBCG MI to section 174 notice [✂].

provide the mobile platform provider with greater control over how web content is accessed on its platform.

6.171 We find that a new mobile platform would likely face fairly low barriers to be able to provide a browser for its platform that is built on an existing browser engine such as Blink. Developing and maintaining a new browser engine is likely to involve much higher development costs.

Barriers relating to Mobile Devices

6.172 A mobile platform needs to be installed on a mobile device. We have therefore considered the ease with which a rival mobile platform could secure this by licensing its platform to an existing OEM or developing its own Mobile Devices.

(a) Options for licensing to existing OEMs are limited: Apple, Google and [✂] [Third Party] manufacture Mobile Devices to be used exclusively with their own mobile platform.[673] We note that there is some evidence of new mobile device manufacturers entering the market.[674] However these have not gained material scale in the UK.[675] Third-party OEMs (such as Samsung and Oppo) use Google's Android Mobile Platform are unlikely to use any available rival mobile platform because:

(i) OEMs will only want their devices to use a new mobile platform if it offers their end-user customers what they want across the parameters of competition set out earlier in this chapter.[676] The various barriers to entry and expansion mean that this is unlikely to be the case;

(ii) OEMs told us that they would face significant financial[677] and resource/time costs[678] if they moved away from using Google's Android operating system; and

[673] Apple's response to section 69 notice [✂]. [✂] response to section 69 notice [✂] and Google's response to section 69 notice [✂].
[674] For example, Nothing released its first phone in 2022 (see BBC, 'Nothing 1 phone quirky design aims to light up market - BBC News', accessed by the CMA on 22 September 2025).
[675] For more detail see the section in Appendix A on 'Mobile device shares of supply'.
[676] 3 responses to section 69 notices: [✂].
[677] 3 responses to section 69 notices; [✂]
[678] 3 responses to section 69 notices; [✂]

(iii) Many OEMs receive substantial payments from Google under the revenue sharing agreements which are detailed in Appendix C.[679] A rival mobile platform would be unlikely to be able to replicate Google's payments because of the importance of scale in the search market.[680] As set out in our SMS investigation into Google in relation to its provision of general Search services, Google is by far the largest provider of services in general search and search advertising.[681] Its leading position in search advertising means that Google is able to extract more value per mobile end-user than a rival who is able to access the same data.[682]

(b) Brand is an important factor in end-users' choice of mobile device, as set out earlier in this chapter. Relative to existing mobile device manufacturers (such as Apple and existing Android OEMs), new manufacturers will not have had the opportunity to build up their brand and, as noted above, existing manufacturers are unlikely to switch away from their current mobile platform.

(c) Manufacturing a mobile device requires resources and expertise: modern Mobile Devices are relatively high-tech pieces of hardware, requiring the sourcing and assembly of many components including the touchscreen, camera, processor, memory, speaker, and microphone. Producing Mobile Devices efficiently requires the establishment of a well-organised production process.[683,684] In response to the Proposed Decision, Apple submitted that entrants can outsource manufacturing to alleviate the need to establish a production process (including the resources and expertise required for this) and reduce costs.[685] While this is true, we note that outsourcing manufacturing may reduce the mobile platform provider's

[679] Google's internal document [✂].
[680] See CMA's Decision to designate Google as having SMS in general search services 'User access and default positions' for more detail.
[681] See CMA's Decision to designate Google as having SMS in general search services Figure 5.1 and Figure 5.5.
[682] See CMA's Decision to designate Google as having SMS in general search services 'Competition from Bing and other traditional general search providers' and 'Competition from specialised search providers' for more detail.
[683] Financial Times, 'Why Trump can't build iPhones in the US', 28 April 2025, accessed by the CMA on 4 June 2025 (https://ig.ft.com/us-iphone/) and Apple's response to section 69 notice [✂].
[684] For example, see Medium, 'The Best Supply Chain in the World — Apple Inc | by armachat | Medium', 2 January 2024, accessed by the CMA on 4 June 2025.
[685] Apple response to Proposed Decision, paragraph 97.

ability to control the quality of its devices,[686] which is a key parameter of competition in mobile platform (see earlier in this chapter).

6.173 We find a new entrant is unlikely to be able to replicate the payments Google makes to OEMs and so use an OEM device, and manufacturing its own mobile device is likely to require resources and expertise and such devices will likely lack an established brand reputation.

Mobile ecosystem level barriers

6.174 There are additional barriers which apply at the combined mobile ecosystem level:

(a) The component parts need to be integrated effectively so that they work well together as a mobile ecosystem: our consumer survey results indicate that when purchasing a smartphone, end-users look for a product that combines what they want across the hardware and software components we have considered above.[687]

(b) Getting end-users to switch from their existing mobile ecosystem is likely to be challenging: this is because, as set out above, end-users typically 'single-home' and are often 'sticky' and disinclined to switch mobile ecosystem due to a combination of barriers to switching, brand loyalty and reported user satisfaction.

[686] For example, a Tech Times article notes that Samsung has increased the number of devices for which it outsources manufacturing but that this largely relates to its budget smartphones, with high-end models manufactured in-house to maintain quality and design standards. (Tech Times, 'Samsung Plans to Outsource 25% of Smartphone Production to Chinese Companies', 26 May 2024, accessed by the CMA on 11 September 2025). An article by the Financial Times notes Apple played an integral role in co-designing production processes in China, ensuring the compliance of its suppliers and spending significant funds on machinery and developing expertise (Financial Times, 'How Apple tied its fortunes to China', 17 January 2023, accessed by the CMA on 12 September 2025). A further Financial Times article discusses challenges faced by Apple in increasing production outside of China to diversify its supply chain, noting it is similarly involved in establishing manufacturing processes in India and has experienced issues with the quality of components produced (Financial Times, 'Apple's manufacturing shift to India hits stumbling blocks', 14 February 2023, accessed by the CMA on 12 September 2025).

[687] In particular, both iOS and Android users mentioned hardware and software features as being important in their smartphone purchase decision. For example: (i) in relation to hardware features, camera was mentioned by 50% of iOS users and 53% of Android smartphone users, and battery life was mentioned by 46% of iOS users and 56% of Android smartphone users; and (ii) in relation to software features, the operating system was mentioned by 35% of iOS users and 37% of Android smartphone users. Accent Mobile Consumer Survey, Figure 9. Further, we note that certain smartphone features and functionalities require both hardware and software capabilities. For example, the quality of modern smartphone cameras depends on software-based processing in addition to physical hardware, and certain software features may not run (or run as well) on devices with hardware limitations.

(c) Some mobile end-users value being part of a wider ecosystem which includes products and services beyond the mobile platform:[688] for example, we note that Google's Mobile Ecosystem extends well beyond the core components of its Mobile Platform; it includes devices like the Pixel Watch, Pixel Buds, Google Nest devices, Fitbit devices and services such as Google Search, Gmail, Google Drive and Google Photos.

(d) The absence of a wider mobile ecosystem may also limit the ability of the entrant to monetise or support its mobile platform: as set out in more detail in our SMS investigation into Google in relation to its provision of general Search services we note that Google, in particular, is able to use its market power in general search services[689] to support its Mobile Platform. Google is able to monetise the consumption of content on its Mobile Platform directly through its search advertising businesses in a way that would not be possible for a rival mobile platform.[690]

Conclusions on barriers to entry and expansion

6.175 Google submitted that it competes with several alternative mobile operating systems and [✂].[691]

6.176 We found that there are high barriers to entry and expansion and Google faces a very limited constraint from the threat of entry and expansion of competing suppliers of mobile platforms.

6.177 The barriers identified for each component above have a cumulative effect in the sense that a rival mobile platform would need to provide all of these components.

6.178 While a rival mobile platform provider is unlikely to face significant barriers associated with gaining access to an existing browser, developing its own mobile browser, or obtaining the resources to develop and maintain a mobile

[688] For example, our consumer survey found that: (i) 39% of iOS users and 20% of Android smartphone users selected compatibility with other devices as an important factor in their smartphone choice; and (ii) 80% of iOS users had at least one other Apple device and 53% of Android smartphone users had a least one other Google device. Accent Mobile Consumer Survey, (i) Figure 9, (ii) page 77.
[689] As set out in CMA's Decision to designate Google as having SMS in general search services, Annex B: Market outcomes Google's share of supply in general search on mobile devices has been between [90 – 100]% and [90 – 100]% throughout the last seven years; and as set out in CMA's Decision to designate Google as having SMS in general search services, Google's share of UK search advertising by providers of general search has exceeded [90 – 100]% in every year since 2020.
[690] See 'Barriers to Monetisation' of CMA's Decision to designate Google as having SMS in general search services.
[691] Google's response to section 69 notice [✂].

operating system particularly those based on an open-source option, a rival provider would face significant overall barriers to entry and expansion in providing a competing mobile platform, with the indirect network effects related to attracting native app developers to a new operating system forming a particularly strong barrier. This is illustrated by the exit or unsuccessful entry of well-resourced companies in smartphones such as Microsoft and Amazon and the difficulties faced by those using versions of Android without GMS.[692]

6.179 This means that the reduction or removal of any single barrier will likely be insufficient to facilitate the entry of a rival mobile platform.

Conclusion on competition from other mobile ecosystems

6.180 Bringing our assessment together to consider the strength of competitive constraint across Google's Mobile Platform as a whole, we conclude that Google's Mobile Platform faces limited competitive constraint from rival mobile ecosystems:

(a) Google is the only licensable Mobile Platform available and it faces no effective constraint from the threat of OEMs switching to license a different mobile platform. This allows Google to control the use of its Mobile Platform and the placement and promotion of its broader services on Android Mobile Devices.

(b) Google's Mobile Platform faces limited competitive constraint from other mobile ecosystems in relation to end-users. Google and Apple have held high and stable shares over a sustained period, with Apple's share of supply [50-60]% and Google's [40-50]%. Google's share is highest among mid and lower priced devices (61% of smartphones between £300-£600 and 100% smartphones below £300). Apple differentiates its Mobile Ecosystem from Google's and, as a result, end-users do not perceive the two ecosystems to be close substitutes. The strength of competitive constraint for end-users varies in different price segments. Apple provides a greater competitive constraint in relation to premium users with smartphones priced over £600 relative to non-premium users, but premium users represent less than a quarter (23%) of Google's UK mobile

[692] For example: (i) Amazon entered with its Mobile Platform Fire OS which is based on the open-source version of Android but, as set out in the 'Competition from non-Google Mobile Platforms for end-users' section, it only has a relatively small presence in low-end tablets and, as set out in the 'Indirect network effects' section above, it was unsuccessful in smartphones, and (ii) Huawei's share of new sales declined materially after it could no longer access Google's apps and services, including GMS (see MEMS Final Report, June 2022, paragraph 3.126).

users. Those considering switching are likely to be among the most contested by Apple and Google but this group is a minority. Most users do not consider switching at all and there are both actual and perceived barriers to switching, for example concerns about loss of data such as photos when moving between platforms

(c) Google's Mobile Platform faces very limited competitive constraint from other mobile ecosystems to attract content providers. Android is a must-have platform, as it is the only means of accessing a large group of users ([40-50]% of mobile users in the UK) with an Android device. Even with some limited competition for end-users as set out above, the extent of this end-user base has remained persistently large over time. While some alternative methods of content distribution are available on Google's Mobile Platform (such as alternative app stores, sideloading, web apps or alternative mobile browsers as set out in Chapter 7), the constraint from these alternatives in terms of accessing or monetising users is limited.

(d) Besides Google and Apple, Amazon is the only other mobile platform provider with a material share of supply in the UK. It provides a weak constraint on Google as it only supplies tablets and its tablets do not have access to the suite of Google's popular apps through GMS.

(e) The revenue sharing agreement between Google and Apple further limits their incentive to compete with each other as the arrangement is of high strategic and financial importance to both.

(f) There are significant barriers to entry and expansion in providing a competing mobile platform and therefore Google faces limited constraint from the threat of such entry or expansion occurring. The indirect network effects related to attracting native app developers to a new operating system are a particularly strong barrier.

6.181 The evidence we have seen does not indicate that Google's position across its Mobile Platform as a whole is likely to change significantly over the next five years.

7. SEMP: COMPETITION FROM ALTERNATIVES TO GOOGLE'S MOBILE CONTENT PROVISION AND DISTRIBUTION

This chapter sets out the competitive constraints on Google's mobile content provision and distribution within Google's Mobile Ecosystem and from non-mobile alternatives:

We have considered the competitive constraint from alternatives to Google's native app distribution within Google's Mobile Ecosystems such as alternative app stores, sideloading, web-based content and emerging forms of distribution. We also considered the constraint from non-mobile alternatives such as gaming platforms. We find that such alternatives only provide a limited competitive constraint on Google's Play Store.

We then considered the competitive constraint from alternatives to Google's mobile browser and browser engine, both within Google's Mobile Ecosystem and from non-mobile alternatives like desktop browsing. We find that these alternatives provide a limited constraint on Google's Chrome browser and very limited constraint on its Blink browser engine.

Competition from alternatives to Google's Native App Distribution

In this section we consider the competitive constraints that Google's Play Store may face from alternatives, including alternative app stores[693], sideloading[694] and pre-installation of native apps by OEMs, both now and in the future. We find that these alternatives provide a limited constraint on Google's Play Store:

Considering shares of supply, the Play Store is the largest app store within Google's Mobile Ecosystem with 1.95bn first time native app downloads in 2024 compared to 51m across all other app stores.

Alternative app stores within Google's Mobile Ecosystem provide a limited constraint and there are barriers to entry and expansion which limit the extent to which Google's Play Store is likely to face a competitive constraint going forwards. In particular these stem from strong indirect network effects as well as Google's own policies and agreements.

[693] Where users can use more than one app store without switching their mobile device.
[694] Where an app developer's native app is downloaded by the user directly from the app developer's web page or via peer-to-peer transfer.

Competition from other forms of content distribution within Google's Mobile Ecosystem, including sideloading, pre-installation, and web apps, is also limited. These channels do not provide a viable alternative to distributing via the Play Store for developers, and have limited usage amongst users.

Non-mobile alternatives are also not a good substitute for distributing via the Play Store for developers, and are instead generally viewed as complementary. Although the ability of users to make purchases on non-mobile platforms provides a constraint on the Play Store, the evidence indicates that this represents only a limited constraint for a sub-set of app developers and for certain users.

This is consistent with the evidence on outcomes set out in Chapter 6.

Competition from alternative app stores within Google's Mobile Ecosystem

7.1 This section sets out our assessment of the extent to which Google's Play Store faces a competitive constraint from alternative app stores within Google's Mobile Ecosystem. For the reasons set out in this section we find that alternative app stores impose a limited competitive constraint on the Play Store.

7.2 Examples of alternative app stores available within Google's Mobile Ecosystem include: Samsung's Galaxy Store, Amazon's Appstore,[695] Xiaomi's GetApps,[696] Oppo's App Market,[697] Huawei's AppGallery,[698] Aptoide's app store named Aptoide,[699] and Epic's Epic Games Store.[700] In the UK, Samsung's Galaxy Store is the most widely available alternative app store within the Google's Mobile Platform as a result of being pre-installed on all Samsung smartphones.

Shares of supply

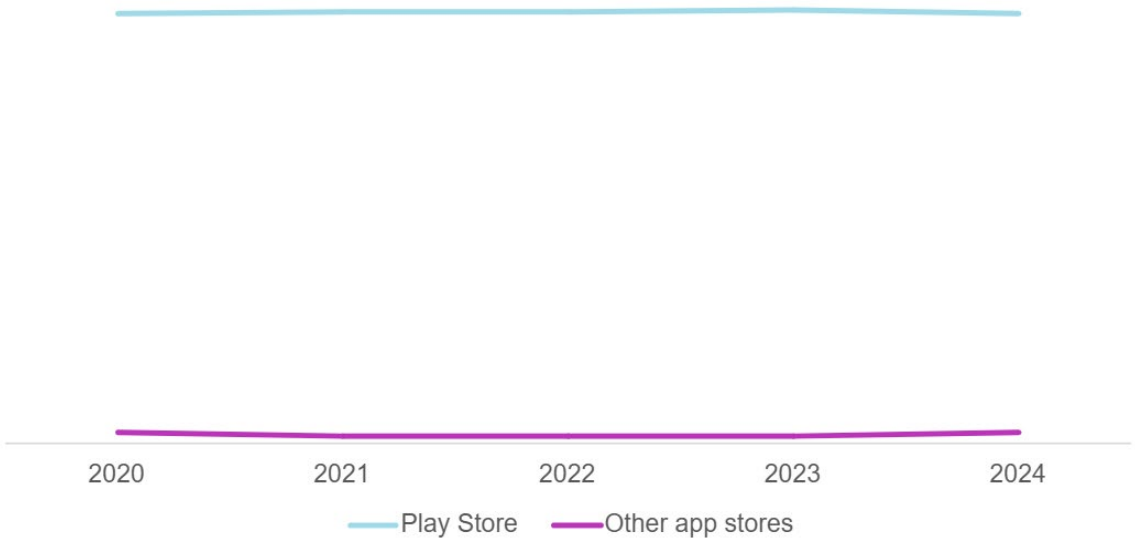
7.3 In this section, we analyse data on UK shares of supply for app stores within Google's Mobile Ecosystem. We find that the Play Store has held an extremely

[695] Amazon's Appstore is no longer supported on Android since August 2025. Amazon Developer, 'Upcoming changes to Amazon Appstore for Android devices and other programs', 20 February 2025, accessed by the CMA on 14 May 2025.
[696] GetApps is pre-installed on Xiaomi, Redmi and POCO smartphones in the UK. It is not available on tablets. Xiaomi's response to section 69 notice [✂].
[697] App Market is pre-installed on Oppo Mobile Devices in the UK. Oppo's response to section 69 notice [✂].
[698] AppGallery is available to install in the UK on Android Mobile Devices via sideloading. It is otherwise pre-installed on Huawei Mobile Devices which use a non-Android operating system. Huawei's response to section 69 notice [✂].
[699] Aptoide is available to install in the UK via sideloading. Aptoide's response to section 69 notice [✂].
[700] EGS is available via sideloading and is also pre-installed on Mobile Devices via the carrier Telefonica. Epic's response to section 69 notice [✂].

high and stable share of supply over a substantial period, which suggests it is subject to limited competition within Google's Mobile Ecosystem.

7.4 The Play Store is the largest app store within Google's Mobile Ecosystem, with [✂] [1.5 – 2] billion first time native app downloads in 2024,[701] compared to [✂] [0 – 100] million downloads across all other app stores.[702] The Play Store held a consistently high share of first-time native app downloads over the period of 2020–2024, with a range of [✂] [90 – 100]%; whereas the combined number of first time native app downloads through alternative app stores accounted for [✂]–[✂] [0 – 10]% over that period.

Figure 7.1: The proportion of native app downloads by app store within Google's Mobile Ecosystem in the UK (2020-2024)



Source: CMA analysis of data from Google, Samsung, Xiaomi, Oppo and Aptoide.

Competition from alternative app stores within Google's Mobile Ecosystem

7.5 Google submitted that within its Mobile Ecosystem it faces competitive constraints from alternative distribution methods such as third-party app

[701] Google's response to section 69 notice [✂].
[702] See Appendix A. Samsung's response to section 69 notice [✂]. Xiaomi's response to section 69 notice [✂]. Oppo's response to section 69 notice [✂]. Aptoide's response to section 69 notice [✂].

stores.[703] It submitted that 'strong competition in Android app stores has resulted in diverse value propositions and business models' and that 'Play competes by aiming to be the safest, most-trusted app store in Android's open ecosystem'.[704]

7.6 Evidence demonstrates that at present alternative app stores within Google's Mobile Ecosystem act as a limited constraint on the Play Store.

(a) This is in particular because of the presence of indirect network effects (as discussed above) which imply that alternative app stores within Google's Mobile Ecosystem, which host materially smaller numbers of users, app developers and/or apps,[705] are less attractive to app developers[706] and users,[707] compared to the Play Store. This is consistent with our finding above that alternative app stores have very low usage and shares of supply, compared to the Play Store.

(b) This is also consistent with third-party evidence suggesting that app developers generally view Google's Play Store as an essential distribution channel for reaching users at scale and alternative app stores on Google's Mobile Ecosystem are generally considered to be inferior substitutes.[708] While some[709] of the native app developers whom we heard from use alternative app stores within Google's Mobile Ecosystem, some of these[710] told us that alternative app stores are inferior to the Play Store in terms of user reach, selection of apps and users' access, indicating that they generally consider alternative app stores as complements to the Play

[703] Google noted that globally, [✂] [60 – 70]% of Android devices have at least two app stores installed and that [✂] [40 – 50]% of app developers distribute their apps through multiple Android app stores. Google's submission [✂]; Google's response to section 69 notice [✂].
[704] Google's response to Proposed Decision, paragraph 96.
[705] As set out in Appendix A, in 2024, an average of [✂] [2 – 3] million users downloaded a native app from the Play Store *in a day*. Whilst the data is not directly comparable, in 2024, an average [✂] [0 – 1] million users downloaded a native app from the Galaxy Store *in a month.* Further, in any month in 2024, the Play Store hosted [✂] [2 – 3] million native apps from approximately [✂] [600,000 – 700,000] app developers on average, compared to [✂] [0 – 1] million native apps from [✂] [0 – 50,000] app developers on Samsung's Galaxy Store. Google's response to section 69 notice [✂]. Samsung's response to section 69 notice [✂].
[706] As noted above, the size of a user base was the most frequently cited factor for app developers' choice of a distribution strategy.
[707] Based on our consumer survey, users with an Android smartphone when asked about the main reasons for using app distribution methods that they use, most frequently cited 'this is most convenient', 'this gives me the choice of apps I need' and 'this was on my phone when I got it'. Accent Mobile Consumer Survey, Table 18.
[708] View supported by 14 large native app developers and 4 small app developers. The remainder did not submit specific views on this point. 18 parties total including 16 RFI responses and 2 call notes. 16 responses to section 69 notices; [✂]; 2 notes of meetings; [✂].
[709] 14 parties total. 11 responses to section 69 notices; [✂]. 3 notes of meetings; [✂].
[710] 6 parties total. 3 responses to section 69 notices; [✂]. 3 notes of meetings; [✂].

Store.[711] This is consistent with further submissions from several third parties that alternative app stores in the UK struggle to attract users and app developers,[712] and are at a disadvantage in terms of reach across Android OEMs, compared to the Play Store.[713]

(c) The number of active users and app developers on Samsung's Galaxy Store has fallen over the period from 2021 to 2024.[714] This is consistent with the evidence we received from some native app developers who submitted that they withdrew[715] their apps from the Samsung Galaxy Store or that they plan to do so in the near future.[716] Some of these app developers explained this is because they did not achieve sufficient user engagement (eg insufficient numbers of downloads) via this distribution channel.[717]

(d) Our analysis of Google's internal documents from the past three years provides some evidence of Google monitoring alternative app stores within its Mobile Ecosystem. Several internal documents include broad mentions that the competition from alternative app stores is increasing.[718] However, only a few documents discuss competition from specific competitors such as Samsung's Galaxy Store[719], Amazon Appstore[720] and Epic Games Store[721] or specific examples of entry and expansion.[722]

7.7 Evidence on potential entry and expansion from Meta, Microsoft, Epic Games, and other potential alternative app store providers, in relation to the gaming

[711] One app developer submitted that it distributes via more than one app store in order to maximise the options available for users to install its apps. [✂] response to section 69 notice [✂].
[712] 7 parties total. 6 responses to section 69 notices; [✂]. [✂] submission to the CMA [✂].
[713] [✂] submission to the CMA [✂].
[714] As noted above, in 2024, Samsung's Galaxy Store hosted an average [✂] [0 – 50,000] app in any month, compared to that average in 2021 of [✂] [0 – 50,000]. Further, in 2024, an average [✂] [0 – 1] million users downloaded a native app from the Galaxy Store in a month, compared to an average of just under [✂] [0 – 1] million in 2021. Samsung's response to section 69 notice [✂].
[715] 3 responses total. 2 responses to section 69 notices; [✂]. Note of meeting with [✂].
[716] [✂] response to section 69 notice [✂].
[717] 2 responses to section 69 notices; [✂]; Note of meeting with [✂].
[718] Google's internal documents; [✂].
[719] Several internal documents from 2023 contained references to the Samsung Galaxy Store, noting [✂]. We understand this to refer to competition in [✂]. Google's internal documents; [✂].
[720] One internal document from 2023 also notes [✂]. Google's internal document [✂].
[721] One internal document from 2023 notes [✂]. Google's internal document [✂].
[722] One of the internal documents from 2023, prepared for senior management of Google's mobile business, also considers [✂]. Another internal document from 2023, prepared for senior management of Google's mobile business. Google's internal document [✂]. One additional document from January 2024, prepared for senior management of Google's mobile business, notes [✂]. Google's internal documents; [✂].

segment and more broadly, suggests that alternative app stores are unlikely to impact significantly the Play Store's position:

(a) Some large app developers [✂],[723] Microsoft[724] and Epic Games[725] submitted that their ability to launch and/or expand alternative app distribution channels is materially limited by a range of Google policies which we explain in more detail below in the section 'Barriers to entry and expansion for alternative app stores within Google's Mobile Ecosystem'.

(b) Amazon submitted that it will no longer be supporting its Appstore for Android Mobile Devices from August 2025 due to [✂] discussed in more detail in section 'Barriers to entry and expansion for alternative app stores within Google's Mobile Ecosystem' below). The Appstore is now no longer available on Android Mobile Devices.[726] Another app developer referred to Amazon's plans to close its Android Appstore, submitting that given a firm of such significance and size could not successfully operate an alternative app store, this casts doubt on the potential for future competition in app stores within Google's Mobile Ecosystem.[727]

(c) Consistent with the above, a range of market participants stated that they did not expect that alternative app stores will become popular in the near future within Google's Mobile Ecosystem in the UK.[728]

(d) Whilst one third party submitted that Google's position may be weakened to some degree by market developments such as the entry of new app stores,[729] many third parties did not expect substantial change to Google's position. Specifically, a range of types of market participants submitted that they did not expect Google's position in native app distribution to substantially diminish over the next five years,[730] some of them noting that this is due to entrenched user behaviour and network effects,[731] Google's

[723] Note of meeting with [✂].
[724] Microsoft's response to section 69 notice [✂].
[725] Epic's response to section 69 notice [✂].
[726] Amazon, 'Amazon Appstore on Android has been discontinued', accessed by the CMA on 24 September 2025.
[727] [✂] response to section 69 notice [✂].
[728] 9 responses to section 69 notices; [✂].
[729] [✂] response to section 69 notice [✂].
[730] 14 responses to section 69 notices; [✂].
[731] [✂] response to section 69 notice [✂].

policies hampering users' uptake of alternative methods of app distribution,[732] and Google's incumbency advantage, more generally.[733]

Barriers to entry and expansion for alternative app stores within Google's Mobile Ecosystem

7.8 This section considers barriers to entry and expansion which may limit the competitive constraint from alternative app stores.

7.9 Entry and expansion of alternative app stores within Google's Mobile Ecosystem will be limited by barriers to producing an alternative app store in general. Specifically, entry and expansion of alternative app stores will be limited by barriers related to very strong indirect network effects and material costs associated with the development and ongoing operation of an app store.

7.10 However, alongside these barriers, the evidence we have received demonstrates that entry and expansion of alternative app stores within Google's Mobile Ecosystem will be impacted by a range of additional barriers, relating to Google's policies and agreements. Below we consider the evidence we received on the following potential barriers:

(a) Google's policies in relation to the discoverability and ease of distributing alternative app stores within Google's Mobile Ecosystem.

(b) Google's agreements with OEMs, specifically in relation to the pre-installation and placement of the Play Store.

(c) Google's policies in relation to the ability of alternative app stores to access functionality within Google's Mobile Ecosystem.

7.11 We have received submissions from a third-party app store provider that Google's past agreements with the largest app developers have limited entry and expansion from alternative app stores within Google's Mobile Ecosystem by preventing those app developers from launching their apps exclusively via competing app stores.[734] We understand that this submission refers to the agreements between Google and app developers (such as 'Project Hug') which

[732] [✂] response to section 69 notice [✂].
[733] [✂] response to section 69 notice [✂].
[734] [✂] response to section 69 notice [✂].

have been discontinued.[735] We have not seen evidence to suggest that Google is pursuing agreements with app developers [✂].

Discoverability and ease of distribution

7.12 App developers who wish to distribute their apps via the Play Store have to agree to Google's Developer Distribution Agreement (**DDA**). Google submitted that it has a clause in its DDA that prohibits in-app links to download off-Play content. Our understanding of this clause is that it prohibits alternative app stores from being listed in the Play Store or promoting their app stores via apps downloaded from the Play Store.

7.13 Evidence suggests that the above clause acts as a material barrier to competition from alternative app stores, by making it more difficult for users to discover and install these app stores within Google's Mobile Ecosystem and therefore by limiting the ability of alternative app stores to attract users and app developers:

(a) One app store provider submitted that before 2013 it was able to distribute via the Play Store and it achieved a 'significant' user base in doing so. When Google banned alternative app stores from distributing via the Play Store, this limited the store's growth and substantially reduced its user numbers.[736]

(b) Another app store provider submitted that it has faced difficulties with advertising its app store within Google's Mobile Ecosystem. It received feedback from social media app developers that they would not carry adverts for its store due to concerns that this would breach Google's DDA.[737]

(c) One app developer submitted that it would like to launch a competing app distribution solution within Google's Mobile Ecosystem, but it is prevented from doing so because the DDA stops it from making users aware of, or linking to, its app distribution solution from within its apps. The app developer submitted that it is also effectively prevented from launching this app distribution solution because Google's agreements with OEMs mean

[735] Google's response to section 69 notice [✂].
[736] [✂] response to section 69 notice [✂].
[737] [✂] response to section 69 notice [✂].

that OEMs would need to request Google's permission to pre-install some necessary software for the app distribution solution to function.[738]

(d) Another app store provider submitted that it would withdraw its app store for Android in August 2025 because [✂].[739]

(e) Additionally, a market participant wanting to provide a web-based store for distributing mobile games submitted that Google's policies prohibit linking out from apps in the Play Store to the web (ie pursuant to the DDA), meaning that users would have to discover and navigate to the store on their own from outside of the game and that this limits its ability to offer such a store.[740]

7.14 In response to the Proposed Decision, Google submitted that not carrying alternative app stores in the Play Store, and not allowing them to be advertised in Play Store distributed apps is pro-competitive, and important for user safety.[741] However, in our view, in the context of the Play Store's substantial share of supply in distribution of native apps on Google's Mobile Ecosystem, and the limited alternative distribution channels available to alternative app store providers, Google's policies limit the ability of alternative app stores to attract users and developers.

7.15 Further, evidence indicates that sideloading of alternative app stores within Google's Mobile Ecosystem is subject to a number of frictions[742] which result in an inferior user experience compared to the Play Store and therefore limit the constraint from alternative app stores. In particular:

(a) One alternative app store provider submitted that frictions to the user journey for sideloading its app store create high user drop-off rates (ie more than 50% of attempts to install its app store are unsuccessful due to warning screens).[743]

(b) Another alternative app store provider submitted that its app store has struggled to gain a sustainable user adoption rate within Google's Mobile Ecosystem, as users are less likely to be knowledgeable about the

[738] Note of meeting with [✂].
[739] Note of meeting with [✂].
[740] [✂] response to section 69 notice [✂]. [✂] submission to the CMA [✂].
[741] Google's response to Proposed Decision, paragraph 93b.
[742] User frictions to sideloading more generally are discussed below in the section 'Competition from sideloading within Google's Mobile Ecosystem'.
[743] [✂] response to section 69 notice [✂].

technical steps involved with the sideloading process.[744] This app store provider submitted that this makes it difficult to [✂].[745]

(c) Another alternative app store provider submitted that frictions to the user installation process for its app store reduces the number of installs and raises the costs of user acquisition campaigns as any installations cannot be implemented by the user seamlessly through its app store in a single click, whereas this is possible on the Play Store – which is pre-installed.[746]

7.16 In response to the Proposed Decision, Google stated that the CMA's consumer survey shows awareness of alternative channels including alternative app stores, noting that 34% of respondents had used alternative app stores.[747]

7.17 We note first that this figure is significantly lower than the 92% of respondents who had used the Play Store. Second, a notable proportion of respondents were not even aware of alternative app stores, with 49% not being aware of the option to download through online app repositories/marketplaces, and 44% not being aware of the option to download through the Amazon App Store.[748] There was greater awareness of the Samsung Galaxy Store, with only 13% of Samsung owners not being aware of the option to download through this app store.[749] This is compared to only 2% who were not aware of the ability to use the Play Store.[750] In addition, 92% of respondents stated that they most often used the Play Store to get apps,[751] and as set out above, shares of supply data shows that the Play Store is used far more frequently than alternative app stores.

7.18 This evidence shows that awareness of alternative app stores is relatively limited.

OEM agreements on pre-installation and placement of the Play Store

7.19 Google submitted that OEMs can choose to pre-install the Google Play Store on a device-by-device basis under the EMADA but they are also free to pre-install

[744] Note of meeting with [✂].
[745] Note of meeting with [✂].
[746] [✂] response to section 69 notice [✂].
[747] Google's response to Proposed Decision, paragraph 95.
[748] Accent Mobile Consumer Survey, Figure 55.
[749] Accent Mobile Consumer Survey, Figure 58.
[750] Accent Mobile Consumer Survey, Figure 55.
[751] Accent Mobile Consumer Survey, Figure 56.

alternative app stores.[752] It also submitted that all approved Android phones and tablets that were activated for the first time in 2024 in the UK had the Google Play Store pre-installed at device set-up.[753] Google submitted that globally [✂] [60 – 70]% of Android Mobile Devices have at least two app stores installed, and in the UK, [✂] [50 – 60]% have at least one third-party app store on their Android device.[754] It submitted that 'app store developers can and do agree deals with Android OEMs or carriers' noting Epic's deal with Telefonica to pre-install the Epic Games Store on 23 million devices in the UK.[755]

7.20 Google's agreements with OEMs create strong incentives for OEMs to pre-install and prominently place the Play Store on the device home screen of Android Mobile Devices. Indeed, we understand from Google's submission above that [✂] [40 – 50]% of Android Mobile Devices in the UK have only the Play Store pre-installed. The impact of these agreements cannot be easily replicated by third-party app stores and therefore limits the constraint they can impose within Google's Mobile Ecosystem. Specifically:

(a) First, OEMs entering into the EMADA and choosing to distribute Google Mobile Services (**GMS)** must, under the terms of this agreement, pre-install and place the Play Store on the home screen. OEMs may choose to do so on a device-by-device basis.[756] This requirement is further explained in Appendix C. OEMs are highly incentivised to distribute a device with GMS – and hence pre-install and prominently place the Play Store on their Mobile Devices – as this allows them to distribute a device with popular Google apps such as Google Maps, YouTube and Gmail. Likewise, this gives an OEM access to Google Play Services. Google Play Services acts as an important software layer, housing Google APIs which work in the background of the device to ensure device functionality and enables developers to use a continually updated set of APIs.[757]

(b) Second, OEMs have strong financial incentives to pre-install and place the Play Store on the home screen in order to benefit from payments made under the Placement Agreements and Revenue Sharing Agreements,

[752] Google's response to section 69 notice dated [✂].
[753] Google's response to section 69 notice dated [✂].
[754] Google's response to section 69 notice dated [✂]. Google's response to Proposed Decision, paragraph 93a.
[755] Google's response to Proposed Decision, paragraph 93a.
[756] The GMS Suite in the EEA/UK excludes GSA and Chrome, which are licensed separately.
[757] Google's response to section 69 notice [✂].

which OEMs can only enter into if they have first entered into the EMADA with Google.[758]

(c) Third, in practice, the effect of the Revenue Sharing Agreements between Google and the OEMs is to reduce the incentive for OEMs to install additional app stores, as this may reduce usage of the Play Store and therefore the revenue they receive from Google, even if installing additional app stores is not prohibited under the terms of these agreements. Although alternative app store providers could in theory offer better terms ie a higher revenue share, to incentivise OEMs to install their app store, we consider that this is unlikely given Google's strong position with Play.

(d) As described above, Epic recently concluded an agreement with Telefonica to install the Epic Games Store on Android smartphones.[759] The agreement will only apply to all new compatible Telefonica Android devices; it will not therefore affect all '23 million users on O2 devices', as submitted by Google.[760] Whilst this shows that pre-installation deals are possible for alternative app stores on Android Mobile Devices, the Epic/Telefonica agreement covers far fewer Android devices than Google's agreements with OEMs and/or mobile network operators (**MNOs**) for the pre-installation of the Play Store. Further, Google's Play Store will be pre-installed and placed on the home screen on these Telefonica Mobile Devices.

7.21 Several third-party submissions were consistent with the view that the pre-installation and prominent placement of the Play Store as well as the relevant policies from Google limit the competitive constraint from alternative app stores within Google's Mobile Ecosystem:

(a) One app store provider submitted that these policies limited its ability to pre-install and prominently place its own app store on Android Mobile Devices because it was rejected by OEMs in the past for potential pre-installation deals. It further submitted that it considers that this has disincentivised potential competitors from attempting to impose a greater

[758] See Appendix C.
[759] Telefonica, 'Telefónica and Epic Games bring Fortnite and the EGS to Telefónica devices', 12 December 2024, accessed by the CMA on 2 October 2025.
[760] Google's response to Proposed Decision, paragraph 93a; see also Google's submission [✂].

constraint on the Play Store in the past.[761] Similarly, two app developers submitted that OEMs are generally reluctant to pre-install third-party app distribution solutions within Google's Mobile Ecosystem because of the impact this might have on their revenue sharing agreements with Google,[762] or the impact on their overall relationship with Google.[763]

(b) An app developer submitted that Google 'maintains a de facto monopoly' over app distribution within Google's Mobile Ecosystem and that Google's bundling of Google Play Services with the Play Store and financial agreements with OEMs further distort competition.[764]

(c) Two other app developers submitted that Google has used OEM agreements to impose restrictions in native app distribution,[765] with one of those parties submitting that Google do so by influencing the pre-installation of the Play Store.[766]

(d) An OEM submitted that Google's Android Compatibility Commitment agreement[767] may potentially impact the availability of alternative app stores within Google's Mobile Ecosystem because the OEM believes it prevents OEMs of Android Mobile Devices from pre-installing third-party app stores.[768]

7.22 We consider that it is likely that this barrier to competition will remain in place. In part, this is because Google submitted that [✂].[769] This is also because our

[761] [✂] response to section 69 notice [✂]. Google submitted that [✂] statement is contradicted by market reality (see Google's submission to the CMA [✂], for example [✂]. However, in reaching the conclusions in this paragraph, the CMA has weighed [✂] section 69 responses against the views of several other third parties, such as [✂], Proton AG, [✂] and [✂], as well as Google's internal documents. We also note [✂] response to the section 69 notice [✂]. The CMA attributes more weight to evidence provided in the context of this investigation, rather than in a public announcement. Further, similar concerns have been raised in the past. See for example a complaint filed by a coalition of 39 attorneys general in the United States District Court, Northern District of California (**the Utah complaint**), considered that 'Google intended to pay its most threatening competitor [Samsung] to stop competing' in app distribution (see paragraph 146, State of Utah et al v. Google LLC et al, 3:21-cv-05227, First amended complaint filed 1 November 2021). In addition, a second complaint filed by Epic Games against Google in the same court (**the Epic complaint**), considered that 'Google attempted to negotiate a deal with Samsung that would prevent the Galaxy Store from becoming a competitive threat' (see paragraph 119, Epic Games, Inc. v. Google LLC et al, Case Number 3:2020cv05671, updated complaint filed 19 August 2021).
[762] Note of meeting with [✂].
[763] [✂] response to section 69 notice [✂].
[764] Proton's response to invitation to comment dated February 2025, page 2.
[765] 2 responses to section 69 notices; [✂].
[766] [✂] response to section 69 notice [✂].
[767] As set out in Appendix C, OEMs that have entered into the ACC and comply with the definition of Android set out in the Compatibility Definition Document can then enter into the EMADA which includes terms relating to the pre-installation and placement of the Play Store and other Google apps.
[768] [✂] response to section 69 notice [✂].
[769] Google's response to section 69 notice [✂].

analysis of Google's internal documents suggests that Google is considering [✂],[770] [✂],[771] and is also considering [✂].[772]

Ability to access functionality within Google's Mobile Ecosystem

7.23 Some evidence we obtained demonstrates concerns of market participants that Google may be using its control of the operating system to restrict access to certain functionality for alternative app stores or apps distributed via third-party solutions, impacting their ability to compete by innovating and adding features to their services. In particular:

(a) One app store provider submitted that Google's operating system-level permissions prevent alternative app stores from offering certain features such as 'anti-cheat' technology similar to Google's Play Integrity feature or implementing 'patching', a functionality that enables a developer to update only a portion of an application without requiring a user to re-download the app.[773]

(b) Another app developer submitted that many native apps within Google's Mobile Ecosystem depend on access to the Play Store to update APIs linked to the GMS and that Google would be able to withhold this access where apps are downloaded via third-party app stores. This would reduce its ability and incentives to further develop and potentially launch a competing app distribution solution within Google's Mobile Ecosystem.[774] Another app developer submitted that this would also make it more costly for app developers to achieve comparable functionality when distributing via alternative app stores (as they must remove and replace Google's APIs with their own versions) and reduce the attractiveness of those rival app stores to app developers.[775]

7.24 In response to the Proposed Decision, Google submitted that concerns about access to functionality for third-party app stores were based on 'faulty and

[770] We understand that Google is pursuing a strategy called [✂], in order to increase user engagement with Play Store apps. Google's response to section 69 notice dated [✂]; Google's internal documents; [✂] Google's internal documents; [✂].
[771] Google's internal document [✂].
[772] See for example Google's internal document [✂]. Although Google also submitted that [✂]. Google's response to section 69 notice [✂].
[773] [✂] response to section 69 notice [✂].
[774] [✂] submission [✂].
[775] [✂] response to section 69 notice [✂]. In more detail, app developers must now use an android app bundle (**AAB**) package format for the Play Store, but they still generally use an android package (**APK**) format for other app stores.

limited evidence', and that there are no restrictions on access.[776] In light of this submission, and the difficulty of verifying third-party submissions on this topic, we have not placed weight on this evidence in our decision.

Competition from alternatives in native app distribution

Competition from sideloading within Google's Mobile Ecosystem

7.25 This section considers the competitive constraint on the Play Store from sideloading within Google's Mobile Ecosystem. For the reasons set out below we find that sideloading provides a limited competitive constraint on the Play Store.

7.26 Google submitted that the Play Store is constrained by alternative methods of native app distribution such as sideloading.[777] Google submitted that sideloading 'functions both as a complement and a substitute, enabling developers to bypass app stores entirely'.[778]

7.27 Sideloading may provide a competitive constraint in two ways; firstly, as a substitute for distributing content through the Play Store for app developers, and secondly, where content is available on both the Play Store and via sideloading, as an alternative channel for users to download apps from, and then make purchases through, outside of the Play Store.

7.28 Evidence from third parties indicates that use of sideloading as a distribution channel is low, and we have seen no evidence of app developers switching away from the Play Store to distribute via sideloading:

(a) Most app store providers submitted that sideloading does not present a competitive constraint on app stores in part due to low take-up.[779]

(b) A range of native app developers told us that they did not identify sideloading as a distribution channel they use within Google's Mobile Ecosystem.[780]

[776] Google's response to Proposed Decision, paragraph 93c.
[777] Google also noted that more than half of Android users sideload apps. Google's submission [✂].
[778] Google's response to Proposed Decision, paragraph 98.
[779] 7 parties total. 6 responses to section 69 notices; [✂]. Note of meeting with [✂].
[780] 43 parties total. 38 responses to section 69 notices; [✂]. 5 notes of meetings; [✂].

(c) As set out below, user uptake of sideloading is limited, suggesting that it would not be a viable substitute to the Play Store for most app developers. Developers also noted several drawbacks of sideloading for users, including weaker security and functionality, which are likely to limit uptake.

(d) One app developer submitted that sideloading has lower discoverability relative to app stores.[781]

7.29 This indicates that there is limited competitive constraint on the Play Store from the threat of developers switching away to distribute by sideloading, and that where sideloading is used, it is generally as a complement to listing on the Play Store.

7.30 For users, evidence also indicates that sideloading is an inferior substitute to downloading apps via the Play Store. Usage data shows that use of sideloading for downloading apps is limited relative to use of the Play Store:

(a) As set out in Appendix A, data from Google shows that [✂] [20 – 30] million Android users sideloaded a native app on Android Mobile Devices in the UK in 2024. Whilst this data may overstate the number of unique users sideloading apps, it appears consistent with Google's submission that more than half of Android users sideload apps.[782]

(b) The number of app downloads is significantly smaller than app downloads from the Play Store. For example, in any month in 2024, on average, an estimated [✂] [20 – 30] million native apps were sideloaded on Android Mobile Devices (this includes downloads from alternative app stores that were not preloaded), in comparison to [✂] [100 – 200] million native apps downloaded through the Play Store.[783]

(c) We note that the usage of sideloading for downloads has increased from 2023 to 2024;[784] however, given the limited availability of time series data, it is unclear if this data reflects a sustained trend. In any case, we would continue to expect the Play Store to be the main distribution channel users use to download native apps – as demonstrated by the findings from the consumer survey discussed in the next paragraph.

[781] [✂] response to section 69 notice [✂].
[782] See Appendix A: Market Outcomes: There were [✂] [40 – 50] million active Android devices in 2024 in the UK. Google's response to section 69 notice [✂].
[783] Google's response to section 69 notice dated [✂].
[784] See Appendix A.

7.31 The evidence from our consumer survey also shows the proportion of users who had accessed content through sideloading as being lower than in Google's data. 92% of users with an Android smartphone had used the Play Store and 26% had used sideloading to get apps onto their current smartphone at any point in the past.[785] The percentage of respondents who had used sideloading increased since a similar survey was done in 2022, as part of MEMS. That survey reported that 12% of users with an Android smartphone had used sideloading before.[786]

7.32 The consumer survey data shows that even where users with an Android smartphone do access content through sideloading, their main way of accessing content remains through the Play Store. In respect of the most used method, 92% of users that used any method(s) stated the Play Store was their primary method and only 2% identified sideloading as their primary method.[787] This is consistent with the MEMS survey results from 2022, which reported that 90% of users with an Android smartphone stated the Play Store was the main way they got apps onto their smartphone while only 1% identified sideloading as their main method.[788]

7.33 In response to the Proposed Decision Google submitted that, according to the CMA's consumer survey, 26% of respondents had used sideloading, indicating awareness of this distribution channel.[789] We note first that this figure is much lower than the 92% of respondents who had used the Play Store. Second, a notable proportion of respondents were not even aware of the ability to sideload, with 43% not being aware of this option, compared to only 2% who were not aware of the ability to use the Play Store.[790]

[785] Accent Mobile Consumer Survey, Figure 55.
[786] Consumer purchasing behaviour in the UK smartphone market for the CMA's Mobile Ecosystems Market Study, Figure 44. There was a slight difference between the sideloading response options in the two consumer surveys. In the earlier survey conducted as part of MEMS, the response option was: 'Download an app directly from a website (also known as "sideloading"') without using an app store'. In the 2025 survey, the response option was: 'Download a mobile app (including another mobile app store) directly from a website (also known as "sideloading"), without using an app store to do so'. It is possible the addition of '(including another mobile app store)' in the 2025 survey prompted more users to select this.
[787] Reported percentages for primary method includes: users that only used one method; and those using 2 or more methods who were asked the follow up question 'Thinking about the different ways that you get apps, which of these ways have you used most often?'. A very small minority of users did not use any method. These users are excluded from the base of this estimate. Accent Mobile Consumer Survey, Figure 56.
[788] Consumer purchasing behaviour in the UK smartphone market for the CMA's Mobile Ecosystems Market Study, Figure 44.
[789] Google's response to Proposed Decision, paragraph 95.
[790] Accent Mobile Consumer Survey, Figure 55.

7.34 Further, evidence indicates that there are several limitations of sideloading for users. Firstly, the user journey to download an app via sideloading, is subject to several warning screens:

(a) When sideloading an app, a user will encounter a series of warning screens (eg unknown source warnings), some of which Google requires OEMs to show to their users.[791] Some of these warning screens contain language such as 'harmful', 'vulnerable' and 'at risk' which may put a user off sideloading. Our assessment shows that installing an app from the Play Store takes around six steps, whereas sideloading an app on an Android device can take between eight and twenty steps depending on the number of prompts displayed and the way the user chooses to sideload an app. In addition, some of the Android device settings (eg the setting to prevent or allow the source to install unknown apps or the Auto Blocker setting on Samsung Mobile Devices[792]) are defaulted to prevent sideloading. Overall, we consider that the combination of these warning screens and the user journey to enable sideloading can add significant friction to the user experience.

(b) Consistent with the above, a number of third parties submitted that warning screens significantly undermine user experience when sideloading and therefore limit the constraints it can place on the Play Store.[793] One of those parties further submitted that Google has 'partnered with Samsung to make direct downloading even more difficult on Samsung Mobile Devices'.[794]

7.35 Second, evidence shows that sideloading apps is an inferior substitute to the Play Store in terms of providing security:

[791] Google submitted that it requires OEMs to show users just one warning when sideloading to Android devices. If the browser (or other relevant app) does not have the permission to install other apps, the warning appears only once when the user grants permission for the unknown source to install apps. It explained this warning is in place because the sideloaded apps have not been vetted by Play's security review, so the apps may expose users to malware. It noted that Google does not require any further warnings, although OEMs and app developers may choose to add these warnings themselves. Google's response to section 69 notice [✂].
[792] Samsung devices include an Auto Blocker setting, which prevents apps from being installed other than through authorised stores, such as the Play Store or the Galaxy Store. The setting also restricts updates over USB and some related functionalities.
[793] 6 responses to section 69 notices [✂].
[794] [✂] response to section 69 notice [✂].

(a) Google submitted that sideloaded apps are 50 times more likely to contain malware than apps distributed through the Play Store.[795]

(b) Submissions from third parties were consistent with the view that sideloaded apps are more prone to security risks. For example, two OEMs, an app store provider and four large app developers submitted that sideloading is inherently risky – due to higher potential risks of malware and phishing[796] and therefore may lower user propensity to use sideloading.

7.36 Third, we have seen some evidence to suggest that sideloaded apps also cannot achieve comparable functionality to the apps downloaded via the Play Store:

(a) Several third parties noted that fewer features are available to sideloaded apps or the user experience is inferior, compared to the Play Store[797] and that sideloaded apps may not be optimised for the mobile device and/or operating system, leading to performance or compatibility issues,[798] and issues related to updating sideloaded apps.[799]

(b) We further note that versions of the Android operating system (ie Android 13[800] and Android 15[801]) appear to limit the functionality of native apps that have been sideloaded, such as accessibility services[802] or notification listener.[803]

7.37 The above evidence indicates that there is a limited constraint on the Play Store from users switching to sideloading apps instead of using the Play Store.

7.38 Considering the above evidence, we conclude that sideloading currently acts as a limited constraint on the Play Store. This is consistent with our assessment of Google's internal documents from the last three years, which provides very little

[795] Google's submission [✂]. Android Developers Blog, 'Strengthening our app ecosystem: Enhanced tools for secure & efficient development', 25 March 2025, accessed by the CMA on 8 July 2025.
[796] 7 responses to section 69 notices; [✂].
[797] 2 responses to section 69 notices; [✂].
[798] [✂] response to section 69 notice [✂].
[799] [✂] response to section 69 notice; [✂]; Note of meeting with [✂].
[800] Esper, 'Android 13's New Sideloading Restriction Makes it Harder for Malware to Abuse Accessibility APIs', 3 May 2022, accessed by the CMA on 13 June 2025.
[801] Android, Android 15 Compatibility Definition | Android Open Source Project, see section titled 'Start of new requirements for Android 15', accessed by the CMA on 13 June 2025.
[802] Android's Accessibility API enables developers to build functionality in apps that can read the contents of a users' screen and perform inputs on behalf of users.
[803] Notification Listener API enables apps to read and interact with notifications.

evidence that Google monitors competition from sideloading. Specifically, we have seen only one internal document from 2023 which [✂].[804]

7.39 As noted above, the usage of sideloading may have increased over time. However, the evidence overall does not suggest that developments in sideloading over the next five years are likely to change significantly the current position of Google's Play Store:

(a) Out of the range of third parties that commented on how sideloading is likely to develop over the next five years, some app developers and one OEM submitted that the use of sideloading may grow by the end of 2030.[805] However, some of those parties expected the growth of sideloading to be limited, for example, to specific industries and interest groups such as gaming.[806]

(b) Furthermore, several large app developers and two alternative app store providers submitted that they do not expect the prevalence or use of sideloading to materially increase,[807] or become a material competitive constraint on the Play Store in the UK by 2030. [808]

(c) This is consistent with the broader evidence suggesting that market participants do not consider future developments are likely to change significantly the current position of Google's Play Store over the next five years elsewhere in this chapter.

(d) Finally, we understand that Google is planning to implement changes to Android that will require all apps to be registered by verified developers in order to be installed by users on Android devices.[809] This is expected to come into force in the UK from 2027 onwards. This may act as a future barrier to developers being able to distribute their apps via sideloading, although we note that it could also improve the security of sideloading, and reduce the need for warning screens.

[804] Google's internal document [✂]. Some internal documents also consider [✂].
[805] 6 responses to section 69 notices; [✂].
[806] 3 responses to section 69 notices; [✂].
[807] 5 responses to section 69 notices; [✂].
[808] 5 responses to section 69 notices; [✂].
[809] Google, Android Developers Blog, 'A new layer of security for certified Android devices', 25 August 2025, accessed by the CMA on 16 September 2025.

Competition from pre-installations within Google's Mobile Ecosystem

7.40 This section considers the competitive constraint on the Play Store from pre-installation within Google's Mobile Ecosystem. For the reasons set out in this section we find that pre-installation provides a limited competitive constraint on the Play Store.

7.41 Google submitted that nearly all Android OEM Mobile Devices have third-party apps such as Microsoft, Meta, Netflix, Twitter, Amazon, TikTok, Spotify, Booking.com and WPS Office pre-installed.[810] Google further submitted that it is constrained by pre-installation because this alternative takes users of, and user spending on, prominent, popular and heavily monetising apps outside of the Play Store.[811]

7.42 Evidence suggests that pre-installation imposes a limited constraint on the Play Store because only a very small number of popular app developers have agreements to pre-install their apps on Android Mobile Devices and because these app developers tend to consider pre-installation as a complementary distribution method to the Play Store:

(a) All five Android OEMs we gathered information from submitted they only pre-install native apps which meet certain criteria or best showcase their devices' capabilities.[812]

(b) Our analysis of data shows that the number of third-party apps pre-installed does not appear to exceed approximately [✂] [0 – 30] apps on any given Android device,[813] compared to an average of [✂] [2 – 3] million native apps hosted on the Play Store in 2024.[814]

(c) Some native app developers indicated that pre-installations are a distribution method they actively use.[815] Of those, several indicated that pre-installation largely acts as a complement to the use of the Play Store because pre-installed apps still depend on the Play Store for a part of the

[810] Google's response to section 69 notice [✂].
[811] Google's submission to the CMA [✂].
[812] For example, apps with strong brand reputation, fulfilling a functional gap and market performance – such as high Play Store rankings, ratings and/or download volumes. 5 responses to section 69 notices; [✂].
[813] Data from 5 responses to section 69 notices; [✂].
[814] Google's response to section 69 notice [✂].
[815] 9 app developers indicated they used pre installation, one OEM submitted a list of apps preinstalled on its devices, from this the CMA understands Microsoft uses preinstallation. 10 responses to section 69 notices; [✂].

pre-installation process,[816] or to deliver updates to Android apps,[817] and many of them indicated that Google's Play Store is the only practical distribution channel to distribute apps to users within Google's Mobile Ecosystem at scale.[818]

7.43 Further, only one app developer submitted that it expected that pre-installation agreements between OEMs and app developers might grow as channels for distributing content over the next five years.[819] This is consistent with the broader evidence suggesting that third parties do not consider future developments to be likely to change significantly the current position of Google's Play Store over the next five years, as set out elsewhere in this chapter.

Competition from web-based content distribution, such as web-apps and PWAs

Competition from web apps within Google's Mobile Ecosystem

7.44 This section considers the competitive constraint on the Play Store from sideloading within Google's Mobile Ecosystem. For the reasons set out in this section we find that web apps impose a limited competitive constraint on the Play Store.

7.45 Web content can be made available to users through traditional websites, web apps[820] or PWAs[821], all of which are typically enabled through a mobile browser.[822] In this section we focus mainly on web apps and PWAs rather than other web-based content (ie traditional websites) because web apps and PWAs have added functionality compared to traditional websites, making them more likely to be substitutable for native apps.

[816] A large app developer noted its app is available for pre-installation on certain Android Mobile Devices but in the form of a 'stub APK', which is still downloaded via one of the pre-existing app stores. [✂] response to section 69 notice [✂].
[817] [✂] response to section 69 notice [✂].
[818] 6 responses to section 69 notices [✂].
[819] [✂] response to section 69 notice [✂].
[820] We define web apps as applications built based on open standards and accessible through a Browser on the open web. Different from Native Apps, Web Apps are designed to be agnostic to the Operating System in use.
[821] We define progressive web apps (**PWAs**) as particular versions of web apps which aim to create an experience even more similar to a Native App compared to a normal Web App.
[822] Note that web-based content can range from being very simple (eg static, non-interactive websites such as blogs) to very complex and interactive PWAs (eg sophisticated software products such as games). As explained in 'Competition from alternatives to Google's Mobile Browser and Browser Engine', the users can interact with web content through in-app browsing, too.

7.46 Google submitted that browser-based services such as web apps and PWAs are competitor distribution channels to the Play Store[823] and that it expects the sophistication and uptake of web apps to increase over the next five years.[824] It submitted that leading brands including Microsoft's Xbox Cloud Gaming and Nvidia's GeForce Now use PWAs to offer a seamless, native-like experience directly to users.[825]

7.47 Web apps may provide a competitive constraint in two ways; firstly, as a substitute for distributing content through the Play Store for app developers, and secondly, where content is available on both the Play Store and via a web app, as an alternative channel for users to access content on, and then make purchases through, outside of the Play Store.

7.48 The evidence indicates that for content providers, at present, web apps are not a viable substitute for native apps downloaded from the Play Store. This is despite web apps in principle being an attractive option for content providers because they involve lower development and maintenance costs compared to native apps.[826] Specifically, a range of content providers we gathered evidence from indicated that web apps are not viable substitutes to native apps,[827] and a number of these content providers indicated that substitutability is particularly limited in terms of functionality[828] and discoverability,[829] which are important factors for app developers' distribution choices.[830] Several content providers further submitted that functionality issues with web apps are due to restrictions that Apple has imposed on web browsers within its Mobile Ecosystem,[831] which carry over to Google's Mobile Ecosystem due to the platform-agnostic nature of

[823] Google's response to section 69 notice [✂].
[824] Google's response to section 69 notice [✂].
[825] Google's response to Proposed Decision, paragraph 99.
[826] The content provider (in this case, a web developer) can develop one web app which can be used across browsers on any operating system due to the common standards of the open web whereas native apps need to be developed for each operating system separately.
[827] Of the remaining 40 content providers, 6 believed web apps were good substitutes and 34 gave no clear view. 80 parties total, split across CMA investigations. 18 responses to section 69 notice; [✂]. Epic's response to invitation to comment, dated 23 January 2025, page 2; 21 responses to requests for information provided in the context of CMA's MEMS; [✂] 6 responses provided in the context of CMA's MBCG MI [✂].
[828] Three app store providers and 19 native app developers submitted that web apps within Google's Mobile Ecosystem have reduced functionality relative to native apps in terms of performance and access to the capabilities of the device they are running on. 16 responses to section 69 notices; [✂] 2 responses to invitation to comment from Epic (page 2); Juul Labs (page 1); 4 notes of meetings [✂].
[829] Four large app developers submitted that web apps suffer from reduced discoverability. 4 responses to section 69 notices; [✂].
[830] For example, several app developers have indicated that functionality and discoverability is an important factor shaping their choices how to distribute their apps. 4 responses to 69 notices; [✂].
[831] 5 responses total. Including 2 responses to section 69 notices; [✂] and 3 notes of meetings [✂].

web apps[832] (ie because web developers build their web apps using functionalities available across all major browsers).

7.49 This indicates that there is limited competitive constraint on the Play Store from the threat of developers switching away to distribute by web apps, and that where web apps are used, it is generally as a complement to listing on the Play Store.

7.50 For users, the evidence shows that within Google's Mobile Ecosystem, web apps are used far less frequently than native apps. This is supported by data from Google, Samsung and Mozilla, and from our consumer survey:

(a) Data from several browser providers in relation to the usage of PWAs within Google's Mobile Ecosystem[833] shows that in 2024, PWAs were installed by users on the home screens of their Android Mobile Devices via Chrome a total of [✂] [10 – 11] million times, via Samsung's Internet [✂] [0 – 50,000] times, and via Mozilla's Firefox [✂] [150,000 – 200,000] times. However, the usage of native apps remains substantively higher at [✂] [1.5 – 2] billion first time downloads of native apps from the Play Store on Mobile Devices in 2024.[834]

(b) The above data is broadly consistent with the evidence from our consumer survey which shows that while a proportion of users on an Android smartphone do access content through web apps, their main way of accessing content remains through the Play Store. Specifically, 92% of users with an Android smartphone had used the Play Store and 27% had used web apps on their current smartphone at any point in the past.[835] However, of the Android smartphone users that used multiple methods of getting apps on their smartphone, 92% stated the Play Store was their primary method and only 1% identified web apps as their primary method.[836]

7.51 In response to the Proposed Decision, Google also submitted that, according to the CMA's consumer survey, 27% of respondents had installed web apps,

[832] Epic's response to invitation to comment, page 2.
[833] 3 responses to section 69 notices; [✂] [✂]; [✂]. As set out in Appendix A: Market outcomes, these browsers account for 97% of shares of supply within Google's Mobile Ecosystem, in June 2025, according to Cloudflare Radar data.
[834] Google's response to section 69 notice [✂].
[835] Accent Mobile Consumer Survey, Figure 55.
[836] Accent Mobile Consumer Survey, Figure 56.

indicating awareness of this distribution channel.[837] We note that this figure is much lower than the 92% of respondents who had used the Play Store. A notable proportion of respondents were not even aware of the ability to use web apps, with 39% not being aware of this option, compared to only 2% who were not aware of the ability to use the Play Store.[838] In addition, as noted above, 92% of respondents stated that they most often used the Play Store to get apps.[839]

7.52 As set out in Appendix A, the use of web apps has slightly increased over time. However, the evidence overall does not indicate that developments in web apps are likely to change significantly the current position of Google's Play Store over the next five years:

(a) Two OEMs and a range of app developers submitted that web apps may advance technologically or increase in use and that this could reduce users' dependency on Google's Play Store;[840] and a few app developers[841] submitted they may invest more in web apps if their performance improves sufficiently.

(b) However, several large app developers, an app store provider and an OEM submitted that they doubt web apps will become a viable substitute for native apps or be widely adopted by 2030.[842] Furthermore, several app developers indicated that they will continue to use the Play Store as their primary distribution channel within Google's Mobile Ecosystem over the next five years.[843] Only a small number of app developers expected to increase their use of web apps and/or alternative app stores, and where they did this was only as a complementary distribution channel to the Play Store.[844] More generally, only a few content providers considered emerging modes of distributing digital content, including web apps, would have a significant impact on competitive dynamics in Mobile Platforms over the next five years[845] and many third parties indicated that they do

[837] Google's response to Proposed Decision, paragraph 95.
[838] Accent Mobile Consumer Survey, Figure 55
[839] Accent Mobile Consumer Survey, Figure 56
[840] 12 responses to section 69 notices; [✂].
[841] 3 responses to section 69 notices; [✂].
[842] 7 responses to section 69 notices; [✂].
[843] 25 parties total. 18 responses to section 69 notices; [✂]. Note of meeting with [✂]. Note several further third parties specified that this was dependent on there being no significant change to the options available to them due to regulatory intervention: 5 responses to section 69 notices [✂].
[844] 6 parties total. 5 responses to section 69 notices; [✂]. Note of meeting with [✂]; The remaining 14 out of 54 app developers gave no view.
[845] 5 responses to section 69 notices; [✂]. For parties who did not consider emerging modes of digital content to have a 'substantial' impact, see: 15 responses to section 69 notices; [✂]; [✂]; [✂].

not expect Google's (or Apple's) position in app distribution to diminish significantly over the next five years.[846]

(c) Google's internal documents from the last three years show very limited evidence of Google monitoring web apps[847] and indeed one internal document suggests Google appears to consider web apps as [✂].[848] We did not find evidence in Google's internal documents to indicate that Google expects web apps to materially disrupt its position in native app distribution in the future.

Competition from cloud-based gaming platforms and super apps within Google's Mobile Ecosystem

7.53 Both cloud-based gaming platforms[849] and super apps can facilitate distribution of other apps and digital content within them. Therefore, at least in principle, both of these distribution methods replicate some of the functions of an app store, such as acting as a point of distribution for app developers within a given mobile ecosystem, allowing users to access content from more than one app developer and performing diverse tasks through a single app.

7.54 However, cloud-based gaming platforms and super apps could only partially constrain the Play Store insofar as they are used for distributing gaming apps or another subset of apps – ie cloud-based gaming cannot act as a substitute for the distribution of non-gaming apps on the Play Store.

Competition from cloud-based gaming platforms

7.55 This section considers the competitive constraint on the Play Store from cloud-based gaming platforms within Google's Mobile Ecosystem. For the reasons set out in this section we find that cloud-based gaming platforms impose a limited competitive constraint on the Play Store.

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[846] 14 parties total. 11 responses to section 69 notices; [✂]. 2 notes of meetings [✂]; 2 responses to the invitation to comment from Epic (page 9); Coalition for App Fairness (page 3).
[847] We found only one internal document from 2023, in which Google states [✂], later stating [✂]. However, that document also highlights [✂]. Google's internal document [✂].
[848] An internal document from 2023, Google appears to consider web apps as [✂], noting that [✂] Google's internal document responsive to section 69 notice [✂].
[849] Cloud-based apps are apps which do not include the majority of their functionality in the app files downloaded onto the device, but stream their content from the cloud. An example of this is cloud gaming apps, which run video games using storage and computing power hosted in the cloud, streaming only the video and audio output of the game to the device. This allows users to play technologically complex games on less powerful devices that may otherwise lack the computing power or storage to support them – such as Mobile Devices. See for example, CMA's Microsoft / Activision Blizzard merger inquiry (Microsoft/Activision) final report paragraph 4.32.

7.56 Cloud-based gaming platforms, where users are able to stream a catalogue of games within a single app or web app, could provide an alternative channel for developers to distribute games, and for users to access gaming content, therefore providing a potential substitute for the Play Store:

(a) Google's submissions were generally optimistic about the development of cloud-based gaming. It submitted that it expects [✂].[850] Google further submitted that the emergence of cloud-based gaming platforms will provide a way for users to play games on Android Mobile Devices without obtaining the game from the Play Store.[851]

(b) Google submitted that recent developments show that cloud gaming platforms are a significant distribution channel for games, which will become even more important over the next five years.[852] Google highlighted an announcement from Microsoft stating that Xbox Cloud Gaming has exited 'Beta', will be available to more Game Pass subscribers, and will have access to over 400 games and enhanced streaming quality for Game Pass Ultimate[853] subscribers.[854] Google also highlighted an announcement from Amazon about the relaunch of its Luna cloud gaming service.[855]

(c) Several game developers distribute through cloud gaming services, including large developers such as Ubisoft and EA. Although only two app developers we spoke to identified cloud-based apps as a distribution channel that they use for reaching users within Google's Mobile Ecosystem in the UK, we note that cloud gaming may be more likely to be utilised by developers who do not typically distribute on mobile, for example developers of console games.[856]

7.57 However, the evidence we have seen and which we have considered in the round, indicates that cloud gaming services, despite Google's submission on

[850] Google's response to section 69 notice [✂].
[851] Google's submission to the CMA [✂].
[852] Google's submission to the CMA [✂].
[853] Xbox Game Pass Ultimate is the highest subscription tier for Game Pass.
[854] Xbox Wire, 'Updates to Xbox Game Pass: Introducing Essential, Premium, and Ultimate Plans', 1 October 2025, accessed by the CMA on 7 October 2025.
[855] Amazon Games, 'Introducing the All-New Amazon Luna: A New Era of Gaming for Everyone', 1 October 2025, accessed by the CMA on 7 October 2025.
[856] Responses to section 69 notices; [✂].The CMA has also considered the impact of [✂] cloud-gaming platform, as set out in subparagraph (c).

the increase in quality and quantity of offering,[857] are currently a limited constraint on the Play Store:

(a) Cloud gaming services only provide a constraint for gaming, and user uptake of cloud gaming services is low. A major cloud gaming provider submitted that this distribution method does not reach a 'commercially significant number of users' and that [✂] nearly all of its mobile app revenue globally comes from the Play Store and Apple's App Store.[858] We find that this view is supported by data gathered in the context of the MBCG MI. That data shows that in January 2024 in the UK, there were only 177,000 monthly active users on Mobile Devices, of which 68,000 were on Android.[859]

(b) Some of the major cloud-based gaming platforms, such as Amazon Luna and Microsoft's Xbox Cloud Gaming are only available within Google's Mobile Ecosystem as a web app. Evidence indicates that as a web app, a cloud-based gaming platform is affected by a range of limitations relative to native apps, for example relating to controller support, audio routing, and touch input.[860] These are in addition to those discussed above in the section 'Competition from web apps within Google's Mobile Ecosystem'.

(c) There are barriers to using cloud gaming services 'on the go', which could limit the extent to which they are substitutes to gaming via native apps on Mobile Devices for users. Cloud gaming requires a strong stable internet connection, and often requires a separate gaming controller for input.[861]

(d) The relaunch of Amazon's Luna cloud gaming service indicates that it is targeting gaming in the home and on large screens, indicating that it will only provide a limited substitute for gaming on Mobile Devices which are

[857] Google's submission [✂].
[858] Response to section 69 notices; [✂]. Google submitted that [✂] response to section 69 notice is contradicted by [✂] announcement on [✂] that its cloud gaming service would be made available to [✂]. Google's submission [✂]. However, in reaching the conclusions in this paragraph, the CMA has weighed [✂] section 69 notice responses with other evidence, including data on cloud gaming users.
[859] This figure is based on the cloud gaming services which provided data to the CMA, which included the major providers of cloud gaming services. CMA analysis of data from market participants. 3 responses provided in the context of the CMA's MBCG MI investigation; [✂].
[860] [✂] submitted that Google's restrictions on alternative distribution and alternative billing systems have prevented it from offering a fully functioning cloud game streaming service to users. [✂] response section 69 notice [✂]. [✂] submitted evidence that cloud gaming web apps have many limitations in terms of functionality relative to native apps. [✂] response to the CMA's MBCG MI request for information notice [✂].
[861] For example, instructions for Xbox Cloud Gaming on Android note possible connection issues with cellular gameplay, and state that 'Although touch controls are enabled for select titles, an Xbox Wireless Controller connected via Bluetooth or USB cable is recommended.' See Xbox Support, 'Set up your Android device for cloud gaming', accessed by the CMA on 8 October 2025.

generally used ‘on the go’. The announcement from Amazon states that ‘the most magical moments in gaming are when you’re playing with family and friends in the living room on the big screen’. It further states that Luna ‘reimagines what it means to play games in the living room’ and is ‘play reinvented for the modern living room.’[862]

(e) There is limited evidence from Google’s internal documents that considers cloud gaming services as a constraint on the Play Store. Google highlighted a number of internal documents which it submitted demonstrate its monitoring of developments in cloud-gaming, and evidence innovations it is making [✂].[863] However, our assessment of these internal documents is that, while they demonstrate monitoring of [✂],[864] [✂],[865] and [✂],[866] [✂] to cloud gaming services [✂].[867]

7.58 Evidence does not indicate that developments in cloud-based gaming platforms are likely to change significantly the Play Store’s position in the next five years:

(a) A number of third parties submitted that cloud gaming is likely to grow over the next five years,[868] and this is broadly consistent with the findings in the CMA’s MBCG MI.[869] Further, some third parties considered that the growth in cloud gaming will impact or has the potential to impact the Play Store’s position.[870]

(b) However, no party we spoke to indicated that the limited competitive constraint on the Play Store from cloud-based gaming platforms is likely to become substantially stronger. As noted above, only a small proportion of content providers considered that emerging modes of distributing digital content such as cloud-based gaming platforms would have a significant impact on competitive dynamics in Mobile Platforms over the next five years.[871]

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[862] Amazon Games, ‘Introducing the All-New Amazon Luna: A New Era of Gaming for Everyone’, 1 October 2025, accessed by the CMA on 7 October 2025.
[863] Google’s submission [✂]. Google’s internal documents; [✂].
[864] Google’s internal documents; [✂].
[865] Google’s internal documents; [✂].
[866] Google’s internal documents; [✂].
[867] Google’s submission [✂] referred to one internal document containing an explicit reference to cloud gaming, a document dated [✂] – which noted [✂]. Google’s internal document [✂].
[868] 6 responses to section 69 notices; [✂]; 2 notes of meetings [✂].
[869] CMA, MBCG MI, Final decision report, paragraphs 12.21 and 12.26 to 12.32.
[870] 2 responses to section 69 notices; [✂]. Note of meeting with [✂].
[871] 5 responses to section 69 notices [✂]. For parties who did not consider emerging modes of digital content to have a ‘substantial’ impact, see: 15 responses to section 69 notices; [✂]; [✂]; [✂].

(c) Finally, as we explain above, third parties expect that the Play Store will remain the key distribution channel they will continue to use within Google's Mobile Ecosystem and that Google's position in app distribution will not significantly diminish over the next five years.

Competition from super apps

7.59 This section considers the competitive constraint on the Play Store from super apps[872] within Google's Mobile Ecosystem. For the reasons set out in this section we find that super apps impose a very limited competitive constraint on the Play Store.

7.60 Super apps are significantly less prevalent in the UK compared to regions such as East and Southeast Asia, where they offer a much wider range of services, and examples of super apps such as WeChat and Grab are widely used.

7.61 There are only a few examples of native apps which could potentially be considered as a super app in the UK. Some market participants, like Uber, TikTok and Facebook, have expanded their in-app offerings beyond one distinct service in the UK and therefore could be said to be moving towards a super app model.

7.62 The evidence indicates that super apps impose a very limited competitive constraint on the Play Store:

(a) Google did not explicitly state that super apps act as a competitive constraint on the Play Store. Consistent with that, in our analysis of the internal documents from Google we found very little evidence that Google monitors the competitive constraint from super apps.[873]

(b) No app developer identified super apps as a distribution channel that they use for reaching users within Google's Mobile Ecosystem in the UK or a competitive constraint on Google's Play Store. One third party submitted that Google has restricted the development of super apps in the past,[874] and another large app developer submitted that the structure of Google's

[872] A super app is a mobile application that combines multiple services into one platform, allowing users to perform diverse tasks within a single application
[873] Google provided a document from 2023 which states that [✂]. In that context it lists several platforms, such as [✂], some of which have apps that could be considered as super apps. However, we note that this document discussed global competitive trends and the apps such as [✂] are generally more popular outside of the UK. Google's internal document [✂].
[874] Note of call with [✂] and response to section 69 notice [✂].

in-app purchase commission rates can deter app 'consolidators' like super apps. [875,876]

(c) Finally, we note that super apps are largely distributed through the Play Store within Google's Mobile Platform, which limits the extent to which they can act as a substitute and a competitive constraint to the Play Store (eg in relation to commission rates offered to app developers).

7.63 While some app developers might be shifting towards a super app model, the evidence does not indicate that the developments related to super apps are likely to change significantly Google's position in native app distribution over the next five years:

(a) We understand that OpenAI is launching new functionality for the ChatGPT app on Android which is being rolled out for UK users.[877] [✂].[878]

(b) Submissions from third parties generally indicate that the future growth of super apps will be modest or uncertain. [879] Only one smaller browser provider, an OEM and two app developers, submitted that they expect usage of super apps to increase by 2030.[880]

(c) Furthermore, as noted above in the section 'Competition from web apps within Google's Mobile Ecosystem', only a small proportion of content providers considered emerging modes of distributing digital content, including super apps, would have a significant impact on competitive dynamics in Mobile Platforms over the next five years[881] and most app developers expected the Play Store to remain the key distribution channel within Google's Mobile Ecosystem.

[875] [✂] submission [✂].
[876] This is because super apps are more likely to be subject to the headline commission rate of 30% and less likely to benefit from the reduced rates of 15% which is charged on revenue up to $1 million per annum.
[877] OpenAI, 'Introducing apps in ChatGPT and the new Apps SDK', 6 October 2025, accessed by the CMA on 8 October 2025.
[878] Note of meeting with OpenAI [✂].
[879] 13 responses to section 69 notices; [✂].
[880] This is explored in greater detail in the 'Competition on Android' section of Competition from alternatives to Google's Mobile Browser and Browser Engine'. 4 responses to section 69 notices; [✂].
[881] 5 responses to section 69 notices; [✂]. For parties who did not consider emerging modes of digital content to have a 'substantial' impact, see: 15 responses to section 69 notices; [✂]; [✂]; [✂]; [✂].

Competition from AI-based content distribution within Google's Mobile Ecosystem

7.64 This section considers the competitive constraint on the Play Store from AI-based content distribution within Google's Mobile Ecosystem.[882] For the reasons set out in this section we find that AI-based content distribution imposes a very limited competitive constraint on the Play Store.

7.65 We have not seen evidence that AI-related developments are likely to change significantly the Play Store's position over the next five years:

(a) Only some parties submitted that AI may lead to alternative distribution methods emerging for digital content on mobile or that AI agents may reduce users' reliance on native apps[883] which at least in principle could weaken the position of the Play Store.

(b) However, a large app developer submitted that AI assistants are unlikely to replace the roles of apps or disrupt the standard model of Mobile Platforms (ie an operating system with native apps) in a widespread or commercialised manner in this period.[884] Additionally, an OEM submitted that integrating AI tools in the Play Store may provide Google with greater control over how apps are presented to users,[885] thus reinforcing its current position.

(c) Google noted that AI can enhance how apps that run on top of an OS can be developed [✂].[886]

(i) In our assessment of Google's internal documents from the last two years, we found only limited mention of AI developments in the context of competition facing the Play Store. They refer to [✂].[887]

(ii) However, our analysis of Google's internal documents did not suggest that Google considers AI to be a substantial threat to its

[882] The potential impact of wider technological and market developments, including AI, on Google's position in Mobile Platforms more broadly is considered in chapter 8.
[883] 3 responses to section 69 notices [✂].
[884] [✂] response to section 69 notice [✂].
[885] [✂] response to section 69 notice [✂].
[886] Google's response to section 69 notice [✂].
[887] Google's internal document [✂]; Google's internal document [✂].

market position. Overall, these documents suggest that Google views AI as [✂][888] [✂][889] [✂].

(d) We also understand that as native apps, any third-party AI-based content distribution models will remain reliant on Google's Play Store for distribution within Google's Mobile Ecosystem and that their access to inputs such as on-device AI compute will likely be controlled by Google as the operating system provider. This is consistent with our view set out later in this chapter that Google's Mobile Platform and its wider Mobile Ecosystem, may ultimately benefit from AI-related developments rather than experience a weakening of its position.

Competition from non-mobile alternatives

7.66 This section considers the competitive constraint on the Play Store from non-mobile alternatives. For the reasons set out in this section we find that non-mobile alternatives impose a limited competitive constraint on the Play Store.

7.67 Content providers distribute content and users access it across both mobile and non-Mobile Devices, including gaming consoles, televisions and desktop computers. We have therefore considered the extent to which non-mobile alternatives provide a competitive constraint to Google's Play Store.

7.68 Non-mobile alternatives may provide a competitive constraint in two ways; firstly as a substitute for distributing content through the Play Store, and secondly, where content is available on both the Play Store and alternative platforms, as an alternative channel for users to spend time and to make purchases, and therefore for developers to earn revenue.

7.69 Google submitted that the Play Store faces competition from PCs and consoles where users can and do divert their attention,[890] particularly in relation to gaming apps, given that ~50% of engagement with these apps takes place outside Mobile Platforms,[891] and this might further grow.[892] Google stated that mobile gaming and console gaming are converging as a result of hybrid or

[888] Google's internal documents [✂]. Google's internal document [✂].
[889] Google's response to section 69 notice [✂].
[890] Google's submission [✂].
[891] Google's submission [✂].
[892] Google's submission [✂].

portable consoles such as the Nintendo Switch and Steam Deck, meaning that 'gaming consoles compete with Mobile Devices for users playing-on-the-go.'[893]

7.70 Google also stated that users can purchase in-game content outside of the Play Store, and still make use of those purchases within the Play-distributed app, thereby 'avoiding Play fees altogether'.[894] Google submitted that PCs and consoles are alternatives for 'the most high-value users because those are the ones that tend to play high-end games.'[895] Google also stated that Play's share of revenue in digital transactions is only [✂]% in the UK if PC and console gaming is included.[896]

7.71 Consistent with Google's submissions, several third parties submitted that they distribute digital content for both Mobile Devices and other devices such as augmented reality/virtual reality (**AR/VR**) devices and gaming consoles.[897] Some third parties also submitted that users are increasingly accessing and consuming similar content across platforms, including both off- and on-Mobile Devices.[898]

7.72 However, third-party evidence overall indicates that non-mobile gaming and content distribution is viewed as a complementary, separate category of content distribution, rather than a viable substitute to the Play Store:[899]

(a) A range of native app developers submitted that their users can and do use additional distribution channels alongside mobile distribution channels to purchase or access apps and content.[900] However, all those that gave a view did not consider the non-mobile channels as viable substitutes to distributing their apps on Mobile Devices via the Play Store and the App Store.[901]

(b) Some app and game developers submitted that Mobile Devices are generally used on the go whilst other devices are typically used in a static location,[902] and that there are key differences in functionality such as

[893] Google's response to Proposed Decision, paragraph 69.
[894] Google's submission [✂]; Google's response to Proposed Decision, paragraph 70.
[895] Google's response to Proposed Decision, paragraph 71.
[896] Google's response to Proposed Decision, paragraph 72.
[897] 4 responses to section 69 notices; [✂]; 2 parties submissions; [✂]; 2 notes of meetings; [✂].
[898] Note of meeting with [✂]; [✂] submission [✂]; [✂] submission [✂].
[899] Given this evidence on non-mobile platforms being largely not a substitute for the Play Store, we do not consider the shares of revenue data submitted by Google to be informative of the competitive constraint on Play.
[900] 20 parties total. 14 responses to questionnaires; [✂]. 6 notes of meetings; [✂].
[901] 16 parties total. 11 responses to questionnaires; [✂]. 5 notes of meetings; [✂].
[902] 2 notes of meetings; [✂].

screen sizes and keyboards.[903] Therefore, they generally have different – albeit often complementary – use cases (eg in a maps app designed for hiking, users might plan their route in greater detail on desktop devices before navigating the route 'on the go' with the mobile app). This is broadly consistent with user research indicating that mobile and desktop browsing fulfil different use cases, as discussed below in the section 'Competition from alternatives to Google's Mobile Browser and Browser Engine'.

(c) A few gaming developers submitted that certain games work best for Mobile Devices or may not function properly on other devices such as PCs or on portable gaming consoles.[904] For example, certain games are embedded in social media apps and rely on Mobile Devices' call functionality, and certain games require access to functionality such as GPS and the device's camera.[905]

(d) A few games developers told us that there are differences in the user bases and reach of distribution methods on and off Mobile Devices.[906] One games developer explained that there is likely to be more overlap between the user bases for mobile portable gaming devices (eg Nintendo Switch) and PC games than there is for either of these two user groups and mobile device gaming users. This is consistent with evidence from our consumer survey, which found that only 25% of respondents who had an Android smartphone also had a gaming console.[907]

(e) Some app developers submitted that their content will not always be available across native apps on Mobile Devices and other platforms.[908] For example, low-end games for Mobile Devices may not be suitable for game consoles which usually offer high-end games that require considerable investment.

7.73 Although there may be some competition for user time and user spend between the Play Store and non-mobile platforms, particularly for gaming, our view is that this is also likely to be limited.

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[903] 2 notes of meetings; [✂].
[904] 2 notes of meetings; [✂].
[905] 2 notes of meetings; [✂].
[906] 2 notes of meetings; [✂]. [✂] submission [✂].
[907] Accent Mobile Consumer Survey, Figure 61. Note that the proportion might be higher for users using gaming content – for example, the MEMS survey found that, in 2022, 44% of Android users used a mobile app for gaming on their smartphone; Of this 44%, 38% also accessed gaming apps using a games console. Consumer purchasing behaviour in the UK smartphone market for the CMA's Mobile Ecosystems Market Study, Figure 45, Figure 46.
[908] 2 responses to questionnaires [✂].

(a) As described above, Mobile Devices and non-Mobile Devices generally have different use cases, including for gaming, with mobile being used more 'on the go' and alternatives such as PCs and consoles being used in the home. Although the availability of portable or hybrid consoles may provide an alternative to mobile gaming for some users, we note that ownership of such consoles is likely to be limited relative to ownership of Mobile Devices.

(b) This is consistent with the survey evidence described above, showing that 25% of respondents who had an Android smartphone also had any gaming console, indicating that ownership of a hybrid or portable console alongside an Android device is therefore likely lower.[909] Therefore, only in limited cases is gaming on non-Mobile Devices a substitute for gaming on mobile. Further, we have seen limited references in Google's internal documents to hybrid or portable consoles taking users from Google's Mobile Ecosystem.[910]

7.74 The evidence indicates that the ability to monetise on non-mobile platforms provides an alternative to the Play Store for some users and app developers. However, this is only utilised by a sub-set of app developers, and the extent of this constraint is limited by app developers' ability to steer users towards making purchases on other platforms, which the evidence indicates can be limited. It therefore only represents a limited constraint on the Play Store:

(a) Internal documents from Google [✂]. One document titled [✂].[911] Another document titled [✂].[912] Other internal documents [✂].[913]

(b) Some app developers submitted that they monetise their apps and services on non-mobile platforms in addition to their mobile apps – ie 'cross-monetise'.[914] For instance, some noted they have websites where they sell in-app consumables or where their users can pay for

[909] In addition, [✂]. This indicates that even amongst gamers on Android, ownership of hybrid consoles is relatively low. Google's internal document [✂].
[910] Google's internal document [✂]. Google's internal document [✂]. Google's internal document [✂].
[911] Google's internal document, [✂]. The same document notes [✂]. Google further submitted information on the methodology for its estimation of [✂]. Google's response to section 69 notice [✂].
[912] Google's internal document, [✂]. Google's internal document [✂].
[913] One internal document notes [✂]. Google's internal document [✂]. One internal document from [✂] notes [✂]. Google's internal document [✂].
[914] 8 parties total. 5 responses to questionnaires; [✂]. 3 notes of meetings; [✂].

subscriptions.[915] One app developer submitted that it offered lower prices to encourage users to make purchases on non-mobile platforms.[916]

(c) However, even where app developers are able to earn revenue outside of the Play Store, this does not necessarily mean that they would be able to influence where users spend, and spending patterns may instead reflect other factors such as usage patterns or where a user first engages with an app. Even if a relatively small proportion of a developer's revenue is transacted though the Play Store, if those users have a strong preference for spending on mobile, then any constraint from non-mobile platforms is likely to be limited.[917]

(d) Some of these app developers noted there are limitations in the take-up and ability to do so.[918] For instance, user friction was flagged as a barrier since users typically want to be able to purchase or subscribe from the platform they are currently using (eg via their Mobile Devices), without having to navigate away to another platform to perform the transaction.[919] This issue was additionally raised in light of anti-steering restrictions put in place by Google in native apps downloaded via the Play Store – discussed further below.

(e) One gaming distribution platform provider submitted that Mobile Devices are currently siloed from gaming on non-Mobile Devices because Google imposes various restrictions that make its Mobile Ecosystem less accessible to third parties. This includes restrictions on alternative methods of app distribution and preventing app developers from steering users to external websites for app discovery and purchases.[920] We received further submissions on Google's steering restrictions from other app developers, which indicates these may be acting as a barrier to cross-platform integration for other content providers (including outside of gaming).[921]

[915] 6 parties total. 3 responses to questionnaires; [✂] 3 notes of meetings; [✂].
[916] Note of meeting with [✂].
[917] Likewise, if a high proportion of a developer's revenue were transacted though the Play Store, but those users were willing and able to switch spending to another platform, for example if Google increased prices, then the constraint from non-mobile platforms could be stronger.
[918] [✂] response to a questionnaire [✂]. Note of meeting with [✂].
[919] [✂] response to a questionnaire [✂]. Note of meeting with [✂].
[920] [✂] submission [✂].
[921] 2 responses to section 69 notices; [✂]; [✂] submission dated [✂]; Note of meeting with [✂].

(f) We note that the ability to monetise outside of the Play Store is only available to app developers which distribute their content outside of the Play Store, and for users who access content through both channels. It therefore only applies to a sub-set of app developers and for certain users.

7.75 Some third parties submitted that cross platform integration might further increase in the future,[922] but we have not seen evidence that this development is likely to change Google's position significantly in native app distribution over the next five years.

7.76 In addition, whilst our analysis of Google's internal documents shows that Google does consider there is an increase in gaming on non-Mobile Devices and an increase in cross-platform gaming, this has been perceived as a potential source of competition[923] - with one document noting [✂]. This trend is often portrayed as a [✂] as opposed to a potential source of competition.

(a) Specifically, a few internal documents from Google contain references to [✂].[924] However, these and further internal documents[925] also indicate that Google is [✂].[926]

(b) Indeed, Google has plans [✂].[927]

(c) Some internal documents suggest that Google expects [✂].[928]

7.77 This supports the view that on-mobile and off-mobile content distribution are to a large extent complements rather than substitutes to each other.

Conclusion on competition from alternatives to Google's Native App Distribution

7.78 We conclude that the alternatives available within Google's Mobile Ecosystem, such as alternative app stores, sideloading, OEMs pre-installing third-party native apps, cloud-based gaming and super apps impose only a limited

[922] Note of meeting with [✂]; [✂] submission [✂].
[923] Google's internal documents [✂]; Google's internal document [✂]. Another internal document from Google, [✂].
[924] Google's internal document [✂]; Google's internal document [✂]; Google's internal document [✂].
[925] Google's internal document [✂]; Google's internal document [✂]; Google's internal document [✂].
[926] Google's internal document [✂].
[927] Google's internal document [✂].
[928] Google's internal document [✂].

competitive constraint on the Play Store and we have not seen evidence that this is likely to change significantly over the next five years.[929]

7.79 The Play Store faces a limited constraint from alternative app stores within Google's Mobile Ecosystem. This is consistent with low shares of supply and usage of these rival app stores and the presence of material barriers to their entry and expansion. Those barriers relate to very strong indirect network effects and material costs associated with the development and ongoing operation of an app store but also Google's policies which: (i) limit the ability of alternative app stores to attain similar levels of discoverability and ease of use for users; and (ii) create strong incentives for OEMs to pre-install and prominently place the Play Store on the device home screen of Android Mobile Devices which cannot be replicated by alternative app stores and limits their ability to compete.

7.80 The Play Store also faces limited constraint from other alternatives, such as sideloading, pre-installations and web apps and this is consistent with the evidence that shows limited usage of these methods and that these methods are viewed as an inferior substitute to the Play Store. Further, whilst the usage of some of these methods such as sideloading or web apps may have exhibited some growth, the evidence overall does not suggest that these developments, the growth of cloud-based gaming or the emergence of super-apps or AI-based content distribution methods are likely to change significantly the Play Store's position over the next five years.

7.81 The Play Store faces a limited competitive constraint from non-mobile content distribution alternatives. The evidence in the round indicates that on-mobile and off-mobile content distribution are generally considered to be complements rather than substitutes, even though these two channels (particularly in relation to gaming content), due to their complementarity, have become more integrated over time. The ability of users to make purchases on non-mobile platforms provides an alternative to the Play Store. However, the evidence indicates that this represents only a limited constraint for a sub-set of app developers and for certain users.

[929] In Chapter 6 we considered evidence on outcomes in terms of commission fees, innovation and revenue shares and found that the observed outcomes could be consistent with some competition but could also be driven by factors unrelated to competition.

Competition from alternatives to Google's Mobile Browser and Browser Engine

In the previous Chapter, we concluded that Google's Mobile Platform faces only limited competition from rival Mobile Platforms. We considered the extent to which Google competes with other Mobile Platforms to attract web developers and found that, as web content is made broadly available by content providers, Google does not compete for web content to be made available on its Mobile Platform.

In this section we consider the extent to which Google faces competition within its Mobile Ecosystem from alternatives to its mobile browser, Chrome, and its mobile browser engine, Blink. We find that Chrome faces limited competitive constraints and this is unlikely to change significantly over the next five years.

Chrome has consistently been the most used mobile browser within Google's Mobile Ecosystem, with an 80% share of supply in June 2025. Blink's share of supply with respect to browser engines is even higher, at 99%.

Although several alternative mobile browsers are available to users within Google's Mobile Ecosystem, evidence indicates that these impose a limited competitive constraint on Chrome. Rivals are limited by several barriers to entry and expansion, and Chrome's consistently high share of supply indicates that these are a limited competitive constraint.

Although AI is likely to impact mobile browsers, we have not seen evidence that its impact is likely to change significantly the position of Chrome in the next five years.

Google's mobile browser engine and in-app browsing implementations face very limited constraints within Google's Mobile Ecosystem, with few alternatives available to users.

There are significant barriers to entry and expansion for rival mobile browsers and browser engines within Google's Mobile Ecosystem. Choice architecture practices are a particularly important barrier, which provide Chrome with an advantage in terms of distribution.

Competition from alternatives to mobile browsing, namely native apps, AI tools, and desktop browsing, is also limited, as these generally fulfil a different purpose to mobile browsers.

7.82 We assess the competitive constraints on Google's mobile browser, browser engine, and in-app browsing implementations separately. We focus primarily on competition at the mobile browser level, since this is where competition for users, and monetisation of mobile browsing, primarily take place. However, we note that competition between mobile browsers is closely interlinked with competition in browser engines and in-app browsing. For example, greater use of a provider's browser engine or in-app browsing implementations will increase its share of web traffic, thereby providing advantages in terms of web compatibility which will benefit its browser.

Competitive dynamics in mobile browsing

7.83 Mobile browsers are generally offered free of charge to users. They are monetised in various ways, including through agreements with search engine providers (whereby search advertising revenue is shared by a search engine provider with the browser developer), advertising or premium services such as built-in virtual private networks (**VPNs**). Some browser developers offer browsers to support other products or services they offer, such as Mobile Devices (eg Apple and Samsung) or search engines (eg Google, Microsoft, and DuckDuckGo). Mobile browser developers compete for users to increase their share of web traffic and therefore generate greater revenue (or for alternative motivations such as promoting their other products eg search engines).

7.84 Evidence from browser developers indicates that the key parameters of competition between browsers include security, privacy, speed, compatibility with web content and innovative features.[930] The quantitative research carried out by Verian asked respondents for the reasons for using their preferred browsers. The most commonly selected answers were familiarity, ease of use, brand, using the same browser as on other devices and access to saved information such as passwords and bookmarks.[931]

7.85 Competition for end-users takes place at the browser level. Browser engines compete to be chosen by browser developers as the browser engine on which to base their browser. The parameters of competition for browser engines are therefore similar, as the features that are important to users in a browser, will also be important to a browser developer in a browser engine. In addition, if a

[930] 5 responses to information requests provided in the context of CMA's MEMS; [✂]; [✂]; [✂]; [✂]; [✂].
[931] Verian Group UK (2024), Mobile Browsers Quantitative Consumer Research, Figure 6.5. Other available options were speed, stability, compatibility, design, security features, privacy features, fewer adverts, and availability of extensions.

browser engine is used by more browser developers, it will increase its share of web traffic, which brings benefits as it will lead to more web developers making their content compatible with that browser engine.

7.86 Both mobile browsers and browser engines seek to attract the largest possible range of web developers and online content providers. Although in theory web content is accessible through any browser or browser engine, issues may exist where web content is not fully compatible with a given browser. By having a large number of users or share of web traffic, browsers and browser engines are more likely to be prioritised for compatibility by web developers. Browsers and browser engines can also seek to attract web developers by offering new, innovative features.

Shares of supply

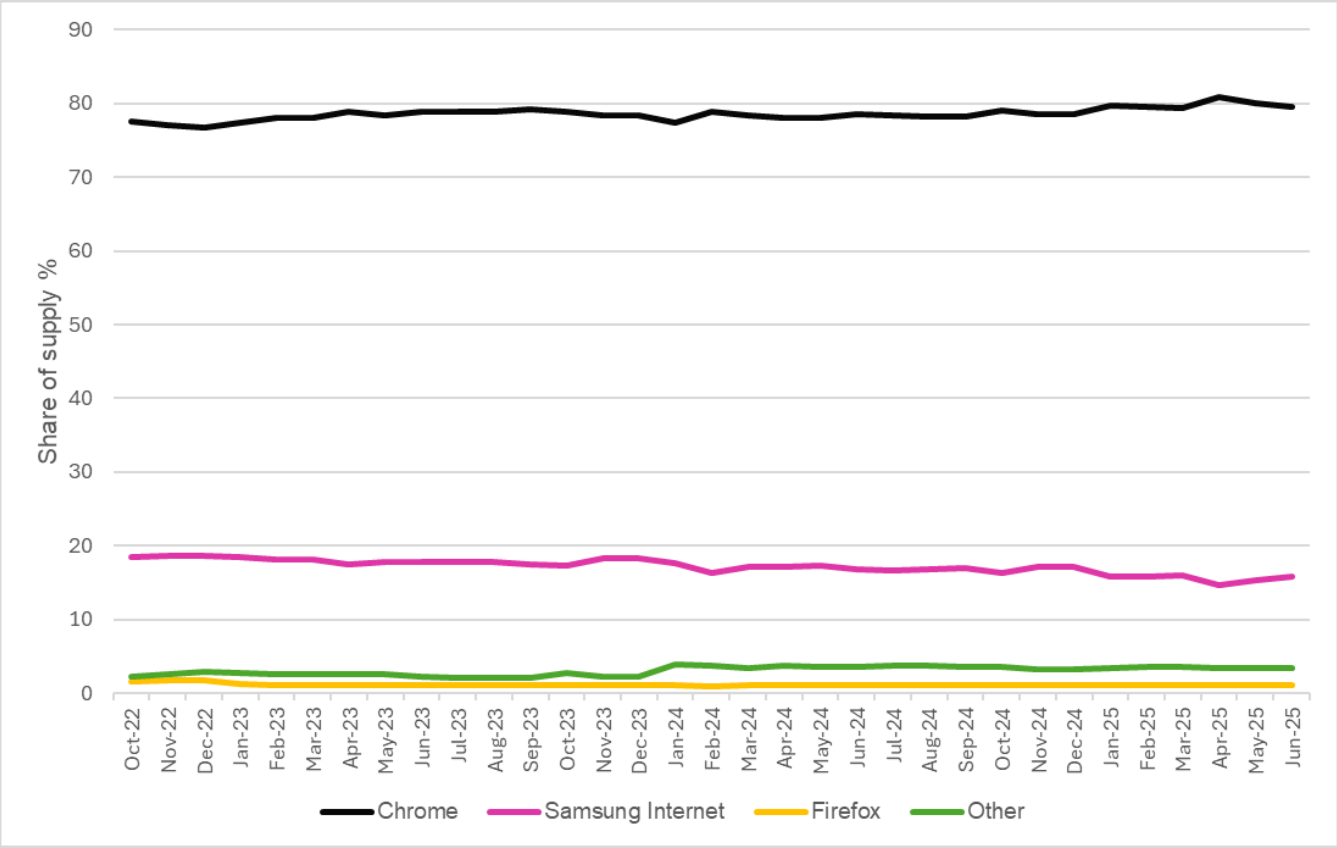
7.87 In this section, we analyse data on UK shares of supply for mobile browsers and mobile browser engines within Google's Mobile Ecosystem. We find that Chrome and Blink have held extremely high and stable shares of supply over a substantial period which suggests they are subject to limited competition within Google's Mobile Ecosystem.

7.88 Many mobile browsers are available to users within Google's Mobile Ecosystem. These include Google's Chrome, Microsoft's Edge and Mozilla's Firefox.

7.89 In June 2025, Chrome had a web traffic share of supply of 80% on Android Mobile Devices in the UK. Samsung Internet had a share of supply of 16%. Each of Firefox, DuckDuckGo, Edge, and Brave had a share of supply of 1%, with other smaller browsers combined making up around a further 1%.[932] These shares of supply have remained similar over the period for which data is available (October 2022 to June 2025, see figure 7.1).

[932] Figures may not sum to 100% due to rounding. Appendix A describes shares of supply in mobile browsers within Google's Mobile Ecosystem in more detail.

Figure 7.2: UK mobile browser shares of supply on Android from October 2022 to June 2025 using Cloudflare Radar data on web traffic



Source: *Cloudflare Radar*

7.90 While alternative browser engines are also available within Google's Mobile Ecosystem, the vast majority of browsers use Google's Blink, which had a share of supply in browser engines on Android of around 99% in June 2025. Firefox and some smaller browsers use Mozilla's Gecko browser engine, which had a share of supply of around 1%. These shares of supply have remained similar over the period for which data is available (October 2022 to June 2025, see Appendix A).

Competitive constraints on Google's mobile browser, browser engine, and in-app browsing

7.91 In this section we consider the evidence on competition from competing mobile browsers, browser engines and in-app browsing implementations. We find that Chrome and Blink face only limited competitive constraints.

Competition from rival mobile browsers

7.92 In this section we consider competition from alternative mobile browsers within Google's Mobile Ecosystem and find that Chrome faces limited constraints. Whilst there is uncertainty about how competition will develop, particularly with regard to AI, we have not seen evidence that these developments are likely to significantly change Google's position in relation to its Mobile Platform in the next five years.

7.93 Google submitted that Chrome faces strong competition within Google's Mobile Ecosystem:

(a) It submitted that 'there are ample alternative browsers for Android users to choose if Chrome was not meeting their expectations', and that Android users regularly use 23 different browsers.[933] It also stated that third-party mobile browsers are able to 'compete on all competitive parameters' and have several different options to distribute and promote their browsers.[934]

(b) Its investment and innovation in Chrome is consistent with Chrome facing strong competition. Google submitted that it has invested over [✂] in Chrome over the last five years ([✂]), and that Chrome 'launched [✂] new features between January 2020 and July 2024.'[935]

7.94 We have found that there are limits to the extent to which alternative mobile browsers provide a competitive constraint on Chrome:

(a) As described above, Chrome has had a consistently high share of supply for many years. This is consistent with Chrome facing limited competitive constraints.

(b) Although Samsung Internet is the second largest mobile browser on Google's Mobile Ecosystem in terms of its share of supply, evidence indicates that it imposes only a limited competitive constraint on Chrome. This is because:

[933] Google's submission [✂].
[934] Google's response to section 69 notice [✂].
[935] Google's submission [✂]. Google's response to Proposed Decision, paragraph 100f.

(i) It is only available on Android, which is likely to limit its appeal to users, given the importance of cross-platform usage.[936]

(ii) Samsung submitted that its mobile browser is [✂], and it does not view Samsung Internet as a major rival to Chrome.[937]

(iii) Whilst Samsung Internet benefits from pre-installation and default status on Samsung devices, it is not a significant competitor on other Android Mobile Devices, with [✂] of its users being on Samsung devices.[938]

(c) As described in more detail below, evidence shows that rival mobile browsers face several barriers to entry and expansion within Google's Mobile Ecosystem, which limit the competitive constraint they impose on Chrome.

7.95 We also considered evidence from Google's internal documents on the competitive constraints faced by Chrome within Google's Mobile Ecosystem. Overall, whilst several of Google's internal documents mention competitors, and in some cases provide evidence of Google [✂], particularly with respect to [✂], there is limited evidence to suggest that these competitors are imposing a constraint on Chrome within Google's Mobile Ecosystem.[939]

Impact of AI and other technologies

7.96 We have considered the impact that AI is expected to have on competition in mobile browsers. AI is already being incorporated into mobile browsers, with several mobile browsers implementing AI features,[940] and the entry of new competitors with an AI focus.[941] The competitive constraint from AI-based alternatives to browsers such as chat-bots, is considered below.[942]

7.97 Google submitted that mobile browsers 'will need to keep up the rapid pace of innovation brought about by advancements in AI.' It stated that OpenAI and

[936] 4 responses to information requests provided in the context of CMA's MEMS; [✂]; Verian Group UK (2024), Mobile Browsers Quantitative Consumer Research, Figure 6.5.
[937] Samsung's response provided in the context of the CMA's MEMS to request for information [✂].
[938] Samsung's response provided in the context of the CMA's MEMS to request for information [✂].
[939] Google internal documents; [✂].
[940] For example Opera, Brave, Microsoft, and Google.
[941] For example Perplexity, accessed by the CMA on 7 October 2025. OpenAI, accessed by the CMA 7 October 2025.
[942] The potential impact of wider technological and market developments, including AI, on Google's position in Mobile Platforms more broadly is considered in Chapter 8.

Perplexity have announced browsers which may fundamentally change how mobile browsers are used.[943] Google also highlighted an interview with Microsoft's CEO of AI, describing conversational AI as 'the future of the web'.[944]

7.98 Google also highlighted 'several foreseeable trends in the coming years that could plausibly weaken Chrome's market position'. As well as AI, these included increasing use of native apps, increasing importance of security and privacy due to developments in quantum computing, integration of blockchain technology, and augmented or virtual reality products.[945]

7.99 Evidence from third parties on the impact of AI is mixed. Whilst a few third parties state that AI could potentially have an impact on competition in mobile browsers, more third parties did not mention it as a potential significant development:

(a) A range of third parties submitted that AI could impact competition in mobile browsers over the next five years. These third parties submitted that AI could significantly change how users interact with the web and therefore disrupt current market positions, however they indicated that this was uncertain.[946]

(b) A range of third parties submitted that they did not expect significant changes in competition in mobile browsers over the next five years (whether due to AI or other technological developments).[947]

(c) Some browser vendors told us more about the expected impact of AI. They stated that they expect AI to be incorporated and have an impact on mobile browsers. There are different potential models for use of AI, including use of AI features or AI-assisted browsers, and agentic browsers. It is currently unclear which model is likely to prevail.[948] Web content is expected to change to become more readable by AI agents.[949]

(d) One browser vendor said that AI has increased the ability of browsers to compete with Safari and Chrome.[950] One browser vendor stated that

[943] Google's submission [✂].
[944] Google's response to Proposed Decision, paragraph 100h. The Verge, 'The Verge – interview with Microsoft AI chief Mustafa Suleyman', 9 December 2024, accessed by the CMA on16 September 2025.
[945] Google's submission [✂]. Google's response to Proposed Decision, paragraph 100h.
[946] 9 responses to section 69 notices; [✂].
[947] 22 responses to section 69 notices; [✂].
[948] 3 notes of meetings; [✂].
[949] 2 notes of meetings; [✂].
[950] Note of meeting with [✂].

agentic browsers will see increasing consumer adoption, but are still far from disrupting default browsers on mobile platforms today.[951]

(e) Other browser vendors said that control of the operating system, and therefore over pre-installation and default status, meant that market positions were unlikely to change.[952]

7.100 Whilst new entry from AI-focused competitors has the potential to impact mobile browsers, its precise implications are unclear and we have not seen evidence that it is likely to impact significantly the position of Chrome on Android:

(a) OpenAI submitted that its 'Operator' product is 'an agent that can go to the web to perform tasks for the user.'[953] It described Operator as [✂] It stated that Operator [✂] It stated that [✂].[954]

(b) As noted in Google's submission [✂],[955] Perplexity has also released a browser that Perplexity described as 'an AI-powered browser that acts as a personal assistant and thinking partner.' It is currently only available on desktop platforms, and was made available to all users in October 2025, having previously been available by invitation only.[956] However, it is expected to be released on more platforms, likely including mobile platforms.[957]

(c) As also noted in Google's submission [✂],[958] Opera has released an agentic browser, Opera Neon, separate to its standard browser. This is currently only available for desktop, and by invitation only. A mobile release is planned.[959] Opera stated that agentic browsers will lead to new user experiences and see increasing consumer adoption, but are still a new concept in the early stages of research and development (**R&D**), and are far from disrupting the default browsers on mobile platforms today.[960]

[951] Note of meeting with [✂].
[952] 2 notes of meetings; [✂].
[953] OpenAI's response to section 69 notice [✂]. In response to the Proposed Decision, Google submitted that [✂]. However, in our view, OpenAI's submission that [✂] is consistent with other third party evidence on [✂].
[954] OpenAI's response to section 69 notice [✂].
[955] Google's submission to the CMA [✂].
[956] Perplexity, 'The Internet is Better on Comet', 2 October 2025, accessed by the CMA on 7 October 2025.
[957] Perplexity, 'The browser that works for you', accessed by the CMA on 22 September 2025.
[958] Google's submission to the CMA [✂].
[959] Opera, 'Opera ships the Opera Neon AI agentic browser', 30 September 2025, accessed by the CMA on 7 October 2025. Opera, 'Frequently asked questions', accessed by the CMA on 7 October 2025.
[960] Note of call with Opera, [✂].

7.101 This is further reinforced by barriers to entry and expansion faced by competitors set out in more detail below. Notably through its current position with Chrome, and its control of its Mobile Ecosystem, Google will continue to benefit from advantages such as pre-installation and default status, which are likely to limit the ability of new entrants to compete. Internal documents from Google show that whilst the use of AI by competitors and potential rivals is monitored, there is limited evidence that it is [✂].[961]

7.102 Therefore, the evidence we have seen indicates that, whilst AI is likely to impact mobile browsers, its precise implications are unclear and the evidence we have seen does not suggest that it is likely to impact significantly the position of Chrome in the next five years.

7.103 Regarding other trends highlighted by Google, we have not seen evidence that these will significantly impact competition in mobile browsers within Google's Mobile Ecosystem within the next five years.

7.104 As described below, evidence shows that neither native apps nor browsing on smart glasses are expected to provide a substitute for browsing on Google's Mobile Ecosystem devices within the next five years. Further, only a small number of third parties mentioned quantum computing or blockchain technology as being likely to impact mobile platforms within the next five years, and none of these mentioned that either was likely to impact competition in mobile browsers.[962]

Competition from rival mobile browser engines

7.105 In this section, we consider the competitive constraint on Blink from alternative browser engines within Google's Mobile Ecosystem and find that Blink faces very limited constraints.

7.106 The only significant competitor is Gecko, which accounts for a very small share of supply, and is limited by barriers to entry and expansion. Meta's browser engine acts as a competitor if in-app browsing is included; however, the extent to which in-app browsing on native apps provides a competitive constraint on standalone mobile browsers, is likely to be limited.

[961] Google monitors AI developments holistically focusing on [✂] considers the impact of AI on areas including [✂].
[962] 3 responses to section 69 notices; [✂].

7.107 On Google's Mobile Ecosystem, browser developers are able to use any browser engine of their choosing. This can include using the Android WebView based on Blink (used by DuckDuckGo), a version or light-fork of Blink (used by Brave and Microsoft Edge), or an alternative browser engine such as Mozilla's Gecko (used by Firefox).[963]

7.108 Google submitted that there are no restrictions on browser developers using a browser engine of their choice. It stated that browser developers 'can use a third-party alternative, such as Gecko (as Firefox and Tor do), or they can modify an existing browser engine (as Samsung Internet and Edge do).'[964]

7.109 Google submitted that competition takes place at the browser level, and it 'is not, therefore, meaningful to discuss competition among browser engines.' However, Google stated that the main alternatives to Blink are WebKit, Gecko, and 'alternative Blink implementations' ie light-forks. Google stated that it 'develops Chromium (ie Blink) as an input that enables Chrome to offer the best possible user experience, including in competition with browsers that use other browser engines, such as Safari and Mozilla'. It also stated that it 'continuously introduces new innovations and features'.[965]

7.110 In response to the Proposed Decision, Google submitted that 'Blink is constrained not only by alternative browser engines but also by other versions of Blink that power rival browsers.' It also stated that Google is 'a responsible steward of Blink' and that changes to Blink are designed and implemented publicly, with browser vendors free to modify and innovate on top of them.[966]

7.111 We find that the extent to which alternative mobile browser engines provide a competitive constraint on Blink is very limited:

(a) As described above, Blink has had a consistently high share of supply for many years. This is consistent with Blink facing very limited competitive constraints.

(b) Light-forks of Blink are limited in the extent to which they differentiate from Blink and therefore provide a weaker competitive constraint than a true alternative browser engine. Although browsers using Blink or Chromium

[963] A fork is another version/copy of an open-source browser engine that has separated from the main branch of code. Light forks may retain most of the original code. Light forks may also be referred to as 'soft forks'.
[964] Google's response to section 69 notice [✂].
[965] Google's response provided in the context of CMA's MEMS to section 174 notice [✂].
[966] Google response to Proposed Decision, paragraphs 100a and 100b.

can add features and modify the engine, this creates compatibility risks, and requires additional work to ensure that updates from Google do not create problems.[967]

(c) As described below, barriers to entry and expansion, namely the high development costs for browser engines, and indirect network effects created by web compatibility, also limit the constraint from existing competitors or new entrants.

(d) Although there has been some recent new entry in browsers (see previous section), these browsers are generally built on Blink, indicating that Blink's position is likely to remain strong.

Competition from rival in-app browsing implementations

7.112 We consider the competitive constraint on Google from alternative in-app browsing implementations within Google's Mobile Ecosystem and find that Google faces very limited constraints.

7.113 Although browser developers are free to provide their own web view and remote tab implementations, evidence indicates that Google's implementations account for a high share of in-app browsing on Google's Mobile Ecosystem.

7.114 Within Google's Mobile Ecosystem, app developers have several options for implementing in-app browsing, including from alternative providers to Google.[968]

7.115 Google submitted that on its Mobile Ecosystem there are no restrictions on the mobile browsers or browser engines that app developers use for in-app browsing, and that this promotes competition in mobile browsers and browser engines.[969] Google submitted that its policies on its Mobile Ecosystem facilitate user choice with respect to in-app browsing.[970]

7.116 However, we find that there are limits to the extent to which alternative in-app browsing implementations provide a competitive constraint on Google:

[967] Note of call with [✂]. [✂] response to information request issued the context of the CMA's MEMS [✂].
[968] App developers may use web-view in-app browsing, remote tab in-app browsing, or an embedded browser engine. For more details see MBCG MI Final Report - Section 7, paragraph 7.8.
[969] Google's response to the CMA's MBCG MI Working Paper 4, paragraph 4.
[970] Google's response to the CMA's MBCG MI Working Paper 4, section 3.

(a) Usage of alternatives to Google's Android WebView is very limited.[971]

(b) Remote tab in-app browsing generally utilises the user's default mobile browser, implying that shares of supply will be in line with shares of supply for browsers within Google's Mobile Ecosystem (see 'Shares of supply' section above), and Googlewill therefore likely have a high share of supply. [972]

7.117 Meta uses its own embedded browser engine for in-app browsing in its apps on Google's Mobile Ecosystem.[973] Meta provides a competitive constraint on Google's in-app browsing implementations, because if Meta's apps (which have a significant number of users) offer an improved in-app browsing experience, users may perform more browsing tasks within Meta's apps, which may therefore draw more web traffic from other native apps or from standalone browsers. This constraint is currently very limited as Meta's browser engine is not available to third-party app developers and therefore does not compete with Google for app developers. Meta submitted that it [✂],[974] [✂]. However, the evidence does not indicate that this is likely to change significantly Google's position in the next five years.

Barriers to entry and expansion for rival browsers and browser engines within Google's Mobile Ecosystem

7.118 We have found that Chrome and Blink have held a high and stable share of supply within Google's Mobile Ecosystem over a significant period of time and that Google faces limited constraints from alternative mobile browsers and in-app browsing implementations, and very limited constraints from alternative browser engines.

7.119 This section considers to what extent barriers to entry and expansion for rival browsers and browser engines within Google's Mobile Ecosystem may limit the competitive constraint on Google.

[971] The only alternative to Google's Android WebView, is Mozilla's GeckoView, which we understand has had very limited uptake. See [✂] response [✂] to an information request issued in the context of MBCG MI [✂]; Note of call with [✂]; Note of call with [✂].
[972] Google's remote tab in-app browsing implementation is known as ChromeCustomTabs.
[973] This browser engine is a fork of Chromium, and Meta submitted that it offers an improved user experience for browsing in its apps, as compared to other in-app browsing options. See Meta, response to an information request issued in the context to the CMA's MBCG MI [✂].
[974] Note of call with Meta, [✂].

7.120 The evidence shows that there are significant barriers to entry and expansion for rival mobile browsers and browser engines within Google's Mobile Ecosystem. Choice architecture practices are a particularly important barrier, which provide Chrome with an advantage in terms of distribution. Indirect network effects and high development costs, particularly for rival browser engines, also limit the ability of rivals to compete effectively with Chrome and Blink.

Development costs and economies of scale

7.121 In this section, we consider development costs and economies of scale and find that these are high and represent a barrier to entry and expansion for mobile browsers and browser engines within Google's Mobile Ecosystem.

7.122 Although initial entry costs can be low, browser developers that want to compete by offering a more differentiated product (eg by modifying a browser engine, or developing their own) will incur higher costs. In the case of browser engines, development costs are very high and this makes new entry unlikely.

7.123 A new mobile browser entrant on Google's Mobile Ecosystem will incur initial one-off costs (for example, costs of software developers and engineers with the necessary technical expertise) to develop and operate a mobile browser, and future recurring costs to maintain and update the browser code.

7.124 Google submitted that it supports browser development with its open-source browser and browser engine, Chromium and Blink. It stated that this lowers barriers to entry and that 'several browser developers (eg, Edge, Brave, Arc, Opera, Samsung Internet) have used Chromium/Blink to launch browsers with little upfront capital investment or considerably reduced cost.'[975]

7.125 The evidence we have seen indicates that:

[975] Google's response to section 69 notice [✂]. Google's response to Proposed Decision, paragraph 100c. In response to the Proposed Decision, Google submitted that the Proposed Decision's finding that there are significant barriers to entry in mobile browsers is inconsistent with its finding that open-source browser engines provide a low-cost entry route for new mobile browsers (Proposed Decision, paragraph 6.128b), see Google's response to Proposed Decision, paragraph 100c. However, the latter finding relates to whether developing a mobile browser to allow users to access web content would pose a significant barrier for a new mobile platform. This section instead discusses barriers to entry and expansion for mobile browsers competing with Chrome or Blink on Google's Mobile Platform, and finds that these are significant.

(a) The ability to use an existing open-source browser engine provides a relatively low-cost option for browser developers.[976] However, making more changes or improvements on top of the browser engine requires greater investment.[977]

(b) Mobile browser development is characterised by economies of scale. Browser developers will incur high fixed costs to develop a browser but low marginal costs to support an additional user on a browser.[978]

(c) Developing and maintaining a browser engine involves much higher development costs.[979] Several browser developers (including some who previously developed their own browser engine) submitted that such high development costs were a reason for not using their own browser engine.[980]

Indirect network effects linked to web compatibility

7.126 In this section, we consider indirect network effects created by web compatibility and find that these represent a barrier to entry and expansion for mobile browsers within Google's Mobile Ecosystem.

7.127 Although browser developers can avoid compatibility issues by using a major browser engine such as Blink (as most do), they are then limited in their ability to differentiate their overall offering. In the case of browser engines, web compatibility issues therefore make new entry unlikely.[981]

7.128 As described above, evidence from web developers shows that they tend to test for compatibility against the browsers with the most users.[982] Browsers are therefore characterised by indirect network effects, whereby a browser needs a

[976] Apple's submission [✂]. Google's response to information request issued in the context of CMA's MEMS [✂]; Google's response to section 69 notice [✂]. Google's response to the CMA's MBCG MI Working Paper 1, paragraph 39.
[977] Google's response to information request issued in the context of CMA's MEMS [✂]; [✂] response to information request issued in the context of CMA's MEMS to [✂]; Note of call with [✂].
[978] 3 responses provided to information requests issued in the context of the CMA's MBCG MI; [✂]. Note of call with [✂].
[979] [✂] response to information request issued the context of the CMA's MBCG MI [✂]; Google's response provided in the context of the CMA's MBCG MI [✂].
[980] 2 responses provided in the context of the CMA's MEMS; [✂]; 2 responses provided in the context of the CMA's MBCG MI; [✂].
[981] As noted in the above, the widespread use of Blink, and limitations in the ability of smaller browsers to differentiate significantly, mean that from a web developer perspective, compatibility issues are relatively limited.
[982] 59 respondents to CMA information requests; 21 responses to section 69 notices; [✂]. 31 responses provided in the context of CMA's MEMS; [✂]. 7 responses provided in the context of CMA's MBCG MI; [✂].

sufficient number of users in order to incentivise web developers to prioritise it for compatibility testing.

7.129 Google submitted that it is committed to and encourages web standards to ensure compatibility between browsers and browser engines. It stated that this commitment to strong compatibility across the web ecosystem results in low barriers to entry and competition within its Mobile Ecosystem, including for smaller browser vendors.[983]

7.130 However, there is evidence from browser developers that web compatibility requirements limit the ability of smaller browsers to differentiate significantly from the major browsers, namely Chrome and Safari, as changes may create compatibility issues, and browser vendors therefore often test to ensure that changes do not impact web content functionality.[984] Mozilla submitted that larger browsers implementing new features that are standards non-compliant can also create web compatibility issues for smaller browser developers.[985] Brave submitted that ensuring web compatibility when introducing new features is important to avoid users potentially switching away, but Brave considers that web compatibility is a less significant barrier compared to the control over defaults.[986]

7.131 Several browser developers (including some who previously developed their own browser engine) submitted that web compatibility issues were a key reason for using one of the major open source browser engines such as Blink, rather than developing their own.[987]

Low user awareness and engagement

7.132 In this section, we consider whether low user awareness of alternative mobile browsers (and the unique functionalities or features that each of them has) may act as a barrier to entry and expansion for rival mobile browsers within Google's Mobile Ecosystem. The evidence set out below indicates that users generally lack awareness and engagement with the topic of mobile browsers, and that

[983] Google's response to section 69 notice [✂].
[984] 3 responses provided in the context of the CMA's MBCG MI; [✂]; 1 response provided in the context of the CMA's MEMS; [✂]; 1 response to section 69 notice; [✂].
[985] Mozilla response to section 174 notice issued in the context of the CMA's MEMS [✂]; Mozilla response to the CMA's MBCG MI Working Paper 1, section titled 'Indirect network effects and web compatibility'.
[986] Note of meeting with Brave, [✂].
[987] 6 responses provided in the context of the CMA's MEMS; [✂]; [✂] response to section 69 notice [✂].

this represents a barrier to entry and expansion for mobile browsers within Google's Mobile Ecosystem.

7.133 Google submitted that research by Verian shows that eight out of ten users knew what their current default browser was and that this proves that there is no lack of awareness.[988] Google also submitted that the research by Verian shows that 85% of users are confident in their ability to download a new browser and 77% of users were confident that they could change their default browser.[989] Google stated that users' switching decisions are driven primarily by users' own preferences.[990]

7.134 We consider that the Verian quantitative research indicates that user engagement with mobile browsers is generally low, with most users (70%) having rarely or never engaged with the topic of mobile browsers previously, most users relying on pre-installed browsers, and most users having not changed their default smartphone browser.[991]

7.135 Similarly, the Verian qualitative research found that there is low engagement with mobile browsers, awareness of alternative browsers is low, and respondents had difficulties working out how to change their default browser.[992]

7.136 The low user awareness and engagement described above may limit the likelihood of a consumer downloading a new mobile browser or changing their default mobile browser. This creates a barrier to smaller or lesser-known browsers competing effectively with Chrome, particularly in light of choice architecture practices on Google's Mobile Ecosystem described below.

Choice architecture

7.137 In this section, we consider whether choice architecture[993] for new Android Mobile Devices creates a barrier to entry and expansion for rival mobile browsers.

7.138 The evidence set out below indicates that, although it is possible for users to switch to an alternative mobile browser to Chrome, there are barriers to doing

[988] Google's response to the CMA's MBCG MI PDR response, paragraph 51.
[989] Google's response to Proposed Decision, paragraph 100d.
[990] Google's response to the CMA's MBCG MI PDR response, paragraph 31.
[991] Verian Group UK (2024), Mobile Browsers Quantitative Consumer Research, Figure 3.6, Figure 6.3, Figure 9.2.
[992] Verian Group UK (2024), Qualitative Research, slide 10.
[993] Choice architecture describes the environment in which users act and make decisions, including the presentation and placement of choices and the design of interfaces.

so, given Chrome's position as the pre-installed and default mobile browser on many new Mobile Devices. We find that this, combined with behavioural biases, and general low user awareness and engagement with mobile browsers (see above), provides Chrome with a competitive advantage and therefore limits the competitive constraints on it within Google's Mobile Ecosystem.

7.139 Research shows that the use of choice architecture is an important factor in user behaviour. Pre-installation, prominent placement, and default settings can all influence user behaviour in light of behavioural biases such as status quo bias.[994]

7.140 Google submitted that Chrome is pre-set as default on a minority of new Android devices (around 40%), and that 70% of devices come with two or more mobile browsers pre-installed.[995] It stated that OEMs and MNOs 'retain control over pre-installation and default settings for browsers and other apps on their Android devices.' Google stated that it has to compete for Chrome to be pre-installed or prominently promoted by OEMs and MNOs, and in addition, Google has been showing users a 'dual choice screen' on Android devices since 2019, which is shown when a user first opens the Play Store.[996]

7.141 Our evidence shows that, as a result of Google's agreements with OEMs and MNOs (see Appendix C) Chrome is pre-installed and placed prominently in the hotseat[997] and/or default home screen on 90–100% of new Android devices in the UK,[998] and is pre-set as the default browser on approximately 40%.[999]

7.142 Several third-party browser vendors submitted that Google's use of choice architecture was an important part of competition in mobile browsers, and this provides Google with a competitive advantage on Google's Mobile Ecosystem.[1000]

7.143 Regarding the ability of third-party browser developers to reach agreements for pre-installation or pre-set default status with Android OEMs or MNOs:

[994] For more details see Section 8 of the MBCG MI final report.
[995] Google's submission [✂]. Google's response to Proposed Decision, paragraph 100e.
[996] Google's response to section 69 notice [✂].
[997] Being in the hotseat means an app is placed centrally in the row of apps placed at the bottom of the home screen.
[998] Google's response to section 174 notice issued in the context of MBCG MI [✂]; Google's response to section 174 notice issued in the context of MBCG MI [✂].
[999] Google's response to the CMA's MBCG MI PDR, paragraph 40.
[1000] 4 responses to section 69 notices; [✂].

(a) Evidence from several browser developers indicates that such agreements are difficult to reach.[1001]

(b) One browser developer, Opera, submitted that, unlike on iOS, pre-installation opportunities are available to third-party mobile browsers on Google's Mobile Ecosystem, and it has in the past been able to reach agreements for pre-installation with Android OEMs.[1002]

(c) In practice, besides OEM mobile browsers such as Samsung Internet, third-party mobile browsers have rarely been pre-installed or pre-set as default on new Android Mobile Devices. As described above, OEM mobile browsers likely impose less of a constraint on Chrome as they are not available cross-platform and are not strategic priorities for the OEMs.

7.144 The mobile browser choice screen is shown to users on Google's Mobile Ecosystem. It is known as the 'dual choice screen' as it provides users with the option to install additional mobile browsers and search apps. Regarding its effectiveness, we note that it displays pre-installed browsers first, and only prompts users to download additional browsers, not to change their default browser. The CMA's analysis for the MEMS report revealed that a very low proportion of users who are shown the choice screen download an additional mobile browser.[1003]

Competition from alternatives to mobile browsing

7.145 We have found that Chrome and Blink have held a high and stable share of supply within Google's Mobile Ecosystem over a significant period of time, that Google faces limited constraints from alternative mobile browsers, very limited constraints from alternative browser engines and in-app browsing implementations, and that barriers to entry and expansion for alternative browser and browser engines are high.

7.146 This section considers the extent of competition from certain alternatives to mobile browsing within Google's Mobile Ecosystem, namely native apps and AI tools, and from non-mobile alternatives. We find that Google's mobile browser

[1001] 4 responses to section 69 notices; [✂].
[1002] Opera's response to section 69 notice [✂].
[1003] MEMS, Appendix G - Pre-installation default settings and choice architecture for mobile browsers, paragraph 69. See MBCG MI final report paragraph 8.211 for more detail.

and mobile browser engine face only limited competition from these alternatives.[1004]

Competition from native apps

7.147 Native apps provide an alternative way for users to access content, and for content providers to reach users.[1005] With in-app browsing, native apps can also provide an alternative way for users to view and browse web content.[1006] We have therefore considered the extent to which native apps provide a competitive constraint to Google's mobile browser and browser engine.

7.148 For the reasons set out in this section, we find that native apps impose only a limited competitive constraint on Chrome on Google's Mobile Ecosystem:

(a) For users, they may provide a substitute in some circumstances, but do not replicate the full functionality of a mobile browser such as browsing the open web and accessing content without the need for downloads like Chrome.

(b) For content providers, although native apps provide an alternative distribution method, the vast majority continue to distribute via the web (and therefore through mobile browsers) in order to reach as many users as possible.

(c) Whilst in-app browsing also substitutes for use of dedicated mobile browsers, this is only in limited circumstances, and in-app browsing offers only limited functionality relative to dedicated mobile browsers.

(d) Evidence does not indicate that the constraint imposed by native apps on Chrome is likely to change significantly over the next five years.

7.149 Evidence indicates that mobile browsers do compete with native apps for end-users to some extent; however, native apps do not substitute for the full functionality of mobile browsers:

(a) Google submitted that Chrome competes with native apps for users, as mobile browsers represent just one channel for accessing online content.

[1004] Although these alternatives do not provide a direct alternative to a mobile browser engine, if they were to impose a strong constraint on mobile browsers, then this would indirectly constrain mobile browser engines.
[1005] The extent of competition from web-based content on Google's native app distribution through the Play Store is considered above in the 'Competition from alternatives to Google's Native App Distribution' section.
[1006] The extent of competition from AI tools, which are often provided as native apps, is considered below.

For a wide range of services, users can choose between access via mobile browsers or native apps.[1007] Google submitted that use of native apps is likely to increase over the next five years, as younger users prefer native apps to websites.[1008] However, Google also submitted that Chrome does not compete directly with native apps. Although Chrome may be used to complete certain tasks that could be accomplished in native apps and vice-versa, it serves a different purpose to a native app. Specifically, it aims to provide users with the best web browsing experience possible.[1009]

(b) Evidence from other browser vendors indicates that native apps do substitute for mobile browsers in certain circumstances. Certain apps such as search apps may substitute for more of the use cases of mobile browsers. However, they do not substitute for the full functionality of mobile browsers in browsing the open web and accessing content without the need for downloads.[1010]

7.150 Evidence indicates that the extent to which mobile browsers compete with native apps for content providers is more limited, with content in native apps and browsers more likely to be complements than substitutes:

(a) Google submitted that mobile browsers also compete with native apps for content providers. Content providers can choose between distributing their content through native apps, basic websites, web apps, PWAs, or some combination of these. A core consideration for providers is the range and quality of APIs available, and therefore a degradation in this for mobile browsers would lead providers to switch attention to native apps, and vice-versa.[1011]

(b) Evidence from a range of content providers indicates that offering content through native apps is not seen as a substitute to offering content through browsers. Instead, they are seen as complements fulfilling different purposes. Reasons given included web content being easier to access for new users, and native content being better for increasing engagement with existing users.[1012]

[1007] Google's response to section 174 notice issued in the context of the CMA's MEMS [✂].
[1008] Google's response to Proposed Decision, paragraph 100i.
[1009] Google's response to section 174 notice issued in the context of the CMA's MBCG MI [✂].
[1010] 6 responses to section 69 notices [✂].
[1011] Google's response to section 174 notice issued in the context of the CMA's MEMS [✂].
[1012] 54 respondents to CMA information requests, comprised of 14 section 69 notices, 36 responses provided in the context of the CMA's MEMS and 9 responses provided in the context of the CMA's MBCG MI.14 responses to

7.151 Evidence indicates that in-app browsers are generally not considered an alternative to mobile browsers:

(a) Google submitted that in-app browsing within native apps is not a substitute for dedicated browser apps. Users use dedicated browser apps for more complex browser journeys leveraging features such as web search and bookmarks which are generally not available in in-app browsers.[1013]

(b) Evidence from browser vendors indicates that whilst in-app browsing is widely used, and this takes web traffic away from dedicated mobile browsers, in-app browsing is only a substitute in limited circumstances and lacks the functionality available in dedicated browsers.[1014]

Competition from AI tools

7.152 AI tools such as chatbots or agents provide an alternative for users to some functions currently performed by mobile browsers. We have therefore considered the extent to which such AI tools provide a competitive constraint on Google's mobile browser and browser engine. This is separate to the impact of AI being incorporated into mobile browsers, considered above.[1015]

7.153 We find that AI tools currently provide a limited competitive constraint on Chrome within Google's Mobile Ecosystem. It is possible that this could increase as the functionality of AI increases; however, this is highly uncertain. On balance, we have not seen evidence that AI tools are likely to significantly impact the position of Chrome within Google's Mobile Ecosystem over the next five years.

7.154 We have not seen sufficient evidence to show that AI powered tools or chatbots compete with mobile browsers. They are currently only a limited substitute for mobile browsers. Although this could change in the future, we have not seen evidence that this is likely to change significantly the position of Chrome within Google's Mobile Ecosystem over the next five years:

section 69 notices; [✂]. 36 responses provided in the context of CMA's MEMS; [✂]. 9 responses provided in the context of CMA's MBCG MI [✂].
[1013] Google's response to section 69 notice [✂].
[1014] 6 responses to section 69 notices; [✂].
[1015] The potential impact of wider technological and market developments, including AI, on Google's position in Mobile Platforms more broadly is considered in Chapter 8.

(a) Google submitted that Chrome does not compete directly with AI powered chatbots. Although both provide users with access to web-based information, chatbots' primary purpose is very narrow, and browsers satisfy a much wider spectrum of user needs.[1016] Google also submitted that AI personal assistants are [✂] for mobile browsers. However, [✂], as there is the potential for some use cases that have so far been addressed by [✂] to be addressed by [✂] the future.[1017]

(b) Google also submitted that an interview with Microsoft's CEO of AI, Mustafa Suleyman, shows that within five years 'AI companions' will replace browsers as the primary way that users interact with content. [1018] Mr Suleyman further stated in this interview that 'in a few years' time it [the AI companion] will be doing all the work for you', and that 'a lot of people will choose to move to that'.[1019] Whilst we have taken these statements into account, we note that they are very general and do not provide any definitive detail about the timing or extent of the expected impact of AI. Further, we attribute more weight to evidence provided in the context of this investigation, rather than in a public interview with Microsoft's CEO of AI, who may overstate the expected impact of its products in that context. Microsoft submitted that it was uncertain 'whether users ultimately will replace browser apps with such assistants'.[1020] We further note Google's response that there is [✂] of AI assistants being a credible substitute for mobile browsers by 2030.[1021]

(c) Most other browser vendors submitted that AI personal assistants are a limited substitute for mobile browsers currently, and several indicated that they do not replicate the full use case of mobile browsers. [1022] Substitutability was generally expected to increase over the next five years, but with differing views and some uncertainty about the extent of this. [1023] For example, Ecosia submitted that AI could 'significantly reduce the need for manual browsing'.[1024] However other browser vendors stated

[1016] Google's response to section 174 notice provided in the context of CMA's MBCG MI [✂].
[1017] Google's response to section 69 notice [✂].
[1018] Google's submission [✂].
[1019] The Verge, 'Microsoft's AI CEO on the future of the browser', 23 September 2025, accessed by the CMA on 7 October 2025.
[1020] Microsoft's response to section 69 notice [✂].
[1021] Google's response to section 69 notice [✂].
[1022] 9 responses to section 69 notices; [✂]. In response to the Proposed Decision, Google submitted [✂].
[1023] 10 responses to section 69 notices; [✂].
[1024] Ecosia's response to section 69 notice [✂].

that it was difficult to predict the extent to which AI could replace browsers.[1025]

(d) Some browser vendors told us about the expected impact of AI tools. They indicated that, although there is uncertainty about how they will develop, AI chatbots are likely to impact search more than browsers. However, this could have a secondary impact on browsers given their usage for search, and the importance of search revenue to many browser vendors.[1026]

(e) Our consumer survey shows that 40% of respondents used an AI assistant for any purpose. A relatively low proportion of respondents reported using AI frequently for tasks such as searching for information and searching for products, which might otherwise be performed in a mobile browser.[1027]

Competition from non-mobile alternatives

7.155 Browsing on desktop (or laptop) computers provides an alternative means for users to access web content.[1028] We have therefore considered the extent to which non-mobile alternatives provide a competitive constraint on Google's mobile browser and browser engine.

7.156 We find that desktop browsing may impose a limited constraint on mobile browsers, as the feature sets are similar and users can switch between the two. Most of the evidence shows that the use cases for mobile and desktop are different, and that they are generally considered complements rather than substitutes. We have not seen evidence that desktop browsing is likely to become a materially stronger constraint on Chrome over the next five years.

7.157 The evidence we have seen generally indicates that browsing on desktop and laptop computers fulfils different use cases for the end-user to browsing on Mobile Devices:

(a) Google submitted that desktop browsing is [✂] for mobile browsing and does not compete closely with browsing on mobile. Users generally use desktop browsers in circumstances where browsing on Mobile Devices

[1025] 3 responses to section 69 notices; [✂].
[1026] 3 notes of calls with [✂].
[1027] The proportion of respondents using AI 'most-often' was; 13% for searches for less simple information, 4% for searches for simple information, 3% for searches for products they want to buy, and 5% for searches for a specific website. Accent Mobile Consumer Survey: Search Questions, Figure 2.
[1028] We also asked stakeholders about other alternatives to mobile browsing such as browsing on smart glasses and smart watches. However, no respondent considered these as credible substitutes to mobile browsing.

would be inconvenient eg due to screen size. Desktop browsing is [✂] for browsing on Mobile Devices when users are on the go.[1029]

(b) Other browser vendors submitted that, although for some use cases mobile and desktop are substitutable, they are often used for different purposes and are therefore generally seen as complements.[1030]

(c) Several pieces of user research also indicate that mobile and desktop browsing fulfil different use cases:

(i) The qualitative research carried out by Verian found that respondents typically had preferences for completing certain tasks on their smartphone versus desktop. In particular, 'anything fiddly', or anything that required high security tended to be on desktop only.[1031]

(ii) Research conducted by Microsoft shows that mobile browsers are used differently to desktop browsers.[1032]

(iii) Research conducted by a browser vendor [✂] shows that users use its browser [✂] on mobile differently to on desktop.[1033]

7.158 For content providers, web content available on mobile will be equally available on desktop browsers, with adjustments to account for differences such as screen size or input mode.[1034] In limited cases some web content may not fully function on mobile due to slight differences in functionality. Web content is therefore by its nature available cross-platform, and content providers do not choose between platforms such as mobile and desktop, although they may optimise their content for either.

7.159 Internal documents from Google show that desktop is often considered separately from Mobile Devices, and Google [✂]. In the documents that do refer to non-Mobile Devices, there is no evidence these devices are imposing a significant competitive constraint on Chrome on Google's Mobile Ecosystem.[1035]

[1029] Google's response to section 69 notice [✂].
[1030] 10 responses to section 69 notices [✂].
[1031] Verian Group UK (2024), Mobile Browsers Qualitative Consumer Research, slide 12.
[1032] Microsoft's response to request for information issued in the context of the MBCG MI [✂].
[1033] Google's response to section 174 notice issued in the context of MEMS [✂].
[1034] Jigsaw research (2024), 'Qualitative Research with Developers on Mobile Browsers and Mobile Browser Engines', pages 22, 23, and 53.
[1035] Google's internal documents; [✂].

7.160 In response to the Proposed Decision, Google submitted that browsers compete on a cross-platform basis, and that 'as far as practicable, Chrome features and innovations are rolled out on all platforms.[1036]

7.161 Whilst we acknowledge that cross-platform effects may lead to features and innovations being implemented across different platforms, we remain of the view, based on the evidence above that Chrome within Google's Mobile Ecosystem faces limited constraints from non-mobile alternatives.

Conclusion on competition from alternatives to Chrome and Blink

7.162 Google's Chrome mobile browser faces limited competitive constraints within Google's Mobile Ecosystem and the evidence indicates that this is unlikely to change significantly over the next five years.

7.163 Although other mobile browsers are available, these face barriers to entry and expansion, and Chrome's consistently high share of supply indicates that these are a limited competitive constraint.

7.164 Although AI is likely to impact mobile browsers, we have not seen any clear evidence of its impact on Chrome, including over the next five years.

7.165 Alternatives to mobile browsers, namely native apps and AI tools, only provide a competitive constraint for a limited set of use cases. The evidence we have seen does not indicate that technological developments are likely to change this significantly in the next five years.

7.166 In browser engines, Google's Blink also faces very limited competitive constraints within Google's Mobile Ecosystem. The only significant alternatives are Mozilla's Gecko, which is considerably smaller, and Meta's in-app browsing engine which is only used by Meta for in-app browsing in its native apps.

7.167 High development costs, and indirect network effects linked to web compatibility, create significant barriers to entry. The large number of mobile browsers which use Blink gives Google significant ability to set the direction of web development, as changes it implements in Blink will likely be adopted more broadly. The widespread use of Blink also reinforces the position of Chrome as, combined with indirect network effects linked to web compatibility, it limits the

[1036] Google's response to Proposed Decision, paragraph 100g.

scope for rival browsers to differentiate significantly from Chrome and potentially provide a greater competitive constraint.

7.168 Google also faces very limited competitive constraints in the provision of in-app browsing within its Mobile Ecosystem. This reinforces the positions of Chrome and Blink because by having a large share of supply in in-app browsing, Google's products increase their share of overall web traffic and therefore benefit from indirect network effects linked to web compatibility.

7.169 Whilst non-Mobile Devices provide an alternative for users and content providers, on the user side they generally serve a different use case to mobile, and on the content provider side are seen as a complement rather than a substitute.

Conclusion on competition from alternatives to Google's mobile content provision and distribution

7.170 Google faces limited competitive constraints in relation to content provision and distribution within its Mobile Ecosystem.

7.171 Within Google's Mobile Ecosystem, there are a range of alternatives to the Play Store such as alternative app stores, sideloading, OEMs pre-installing third-party native apps, cloud-based gaming, super apps, and web-based content distribution. However, overall, we consider that these alternatives impose only a limited competitive constraint on the Play Store given that these methods have limited usage and are generally not viewed as a close substitute (rather, in some cases they are viewed as complements) to native apps on the Play Store.

7.172 Google's Chrome mobile browser also faces limited competitive constraints within Google's Mobile Ecosystem. Although alternative mobile browsers are available, these face barriers to entry and expansion, and Chrome's consistently high share of supply indicates that these are a limited constraint. In addition, Google faces even less competition to its browser engine Blink, and in its provision of in-app browsing. Alternatives to mobile browsers, namely native apps and AI tools, only provide a limited competitive constraint for a limited set of use cases.

7.173 Whilst non-Mobile Devices provide an alternative for users and content providers, in the case of both native app and web content, on the user side they generally serve a different use case to mobile, and on the content provider side

are seen as a complement rather than a substitute. The ability of users to make purchases on non-mobile platforms provides an alternative to the Play Store. However, the evidence indicates that this represents only a limited constraint for a sub-set of app developers and for certain users.

7.174 The evidence we have seen does not indicate that Google's position in content distribution on its Mobile Ecosystem is likely to change significantly over the next five years.

8. CONCLUDING ON SEMP AND POSS

8.1 In this chapter we present the final elements of our SEMP assessment: a profitability analysis; and our assessment of competition to Google's Mobile Platform arising from wider technological and market, regulatory and other developments. We also present our assessment in relation to whether Google has a position of strategic significance in respect of its Mobile Platform and conclude on whether Google meets both SMS conditions in respect of its Mobile Platform.

Profitability analysis

Google has been highly profitable for at least the last ten years, making high profits and a high return on capital globally. We have not seen evidence indicating that these high levels of profitability will not continue. We estimate that Google's Mobile Platform activities in the UK have similarly generated a high return on capital relative to our estimate of Google's **WACC**[1037] over this period.

Overview

8.2 Profitability can be an indicator of market power. This is based on the premise that under effective competition a firm would generally earn no more than a 'normal' rate of profit over the long run. Where firms persistently earn in excess of a normal return, this signals that there may be limitations in the competitive process. [1038]

8.3 Since our SMS assessment relates to Google's market position in the UK, we are interested in the profitability of Google's UK Mobile Platform.[1039] In this regard, we note that:

(a) To inform our assessment of Google's position in the UK for its Mobile Platform, we have assessed financial information on Google's Mobile Ecosystem. Those figures include Google's revenue for activities which indirectly contribute to Google's Mobile Platform revenue, including from mobile search and the sale of its Mobile Devices.

[1037] Weighted average cost of capital (**WACC**), a widely used benchmark for returns on an investment
[1038] More detailed analysis is contained in Appendix B.
[1039] See CMA194, paragraph 2.55(e)

(b) We have started with global figures, recognising that the digital activities we are assessing are global in nature, and because Google did not provide information on the profitability of its Mobile Platform activities at a UK level.[1040]

(c) Our analysis is therefore based on global data from Google supplemented by information we obtained from Google to enable more detailed analysis of mobile products and services and UK specific analysis where appropriate.

8.4 Our analysis focuses on the following topics:

(a) overall size and financial position for the Alphabet Group;

(b) global profitability of Google's Mobile Platform; and

(c) UK profitability of Google's Mobile Platform.

8.5 We have focused on standard reporting metrics to inform our analysis of Google's revenues, costs, and profits. In particular:

(a) We have assessed the amount of profit Google has earned in absolute terms, and as a percentage 'return on capital employed' (**ROCE**), comparing accounting profit with the size of investment made by Google to achieve those profits;[1041]

(b) We have compared our findings against its weighted average cost of capital (WACC), which is a widely used benchmark for returns on an investment. The WACC is essentially the minimum return required on an investment or asset to satisfy the owners and creditors; and

(c) We have considered revenue and operating profit metrics relating to Google's Mobile Platform activities.[1042]

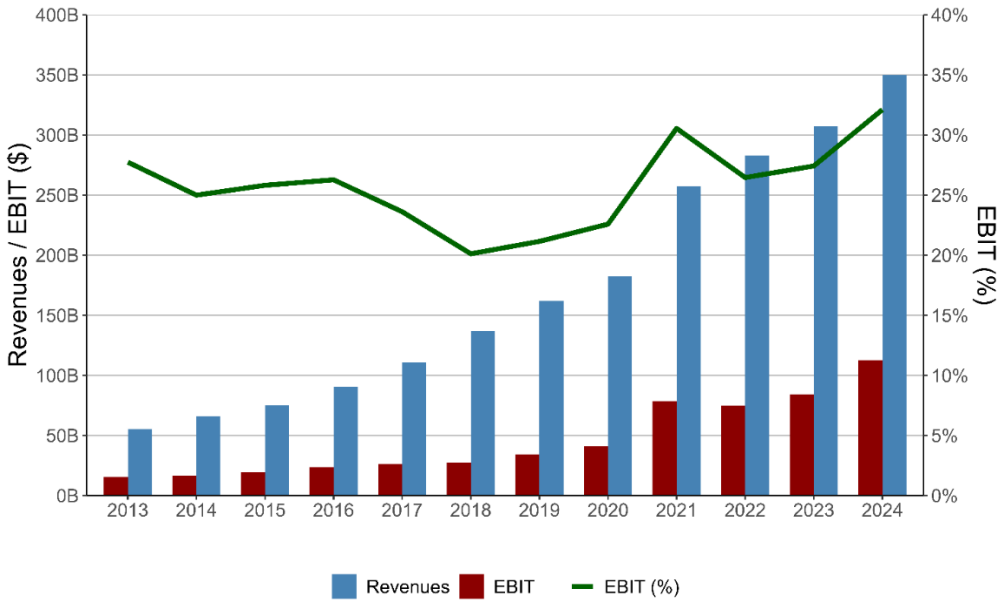
Profitability of the Alphabet Group

8.6 Our profitability analysis shows that, at the group level, Google generates substantial profits and operating cashflows in absolute terms. As shown in

[1040] Google's response to section 69 notice [✂].
[1041] Our approach is set out in more detail in the Profitability Appendix (Appendix B).
[1042] A more detailed analysis is in Appendix B.

Figure 8.1 below, Alphabet Group's earnings before income and tax (**EBIT**) have remained consistently high and the profit margin has been above 25% for each of the last four years.[1043,1044]

Figure 8.1 Alphabet Group Revenue and EBIT between 2013 and 2024



Source: CMA analysis of Alphabet Group 10k data[1045]

8.7 As set out in Appendix B, Google's[1046] profitability, when measured as a percentage ROCE, is around 40%,[1047] compared with our estimate of Google's WACC of [✂] [10– 15]%, based on Google's own estimation of WACC for the Alphabet Group.[1048] This profitability estimate remains high even when adopting a conservative sensitivity analysis, for example in relation to intangible assets.[1049]

[1043] CMA analysis of Alphabet, 'Form 10-K for Alphabet INC filed 02/05/2025', accessed by the CMA on 16 July 2025.
[1044] EBIT is based on Google's Income from Operations as reported in its Consolidated Statements of Income in published accounts. Alphabet, 'Form 10-K for Alphabet INC filed 02/05/2025', accessed by the CMA on 16 July 2025, page 53.
[1045] Alphabet, 'Form 10-K for Alphabet INC filed 02/05/2025', accessed by the CMA on 16 July 2025.
[1046] We have considered the profitability both of the Alphabet Group and the Google Services segment, which is the reporting segment that Google's general search services are part of.
[1047] We estimate that Google has been able to generate an average ROCE of 38% over the last ten years, and that this has been trending higher in the last few years. Our analysis is set out in more detail in Appendix C.
[1048] Google's response to section 69 in relation to SMS investigation into Google's general search and search advertising services [✂]; and Alphabet Inc.'s consolidated financial statements, which can be found on pages 48-91 of Form 10-K for Alphabet INC filed 02/05/2025.
[1049] For example, we have conducted a sensitivity analysis to our ROCE based profitability analysis to test the sensitivity of our profitability findings to changes in intangible assets relating to Google's R&D expenditure

Profitability of Google's Mobile Platform

8.8 The profitability figures set out above relate to Google's overall profitability. However, for the purposes of our SMS assessment we are concerned with the profitability of Google's UK Mobile Platform activities.

8.9 Ideally, we would assess the profitability of Google's mobile activities specifically, taking into account all relevant costs and an appropriate capital base. However, Google does not report on the profitability of its Mobile Platform activities in its published accounts.[1050] We also note that Google does not directly monetise its Chrome browser, browser engine, or its operating system (Android).

8.10 We have therefore based our analysis on revenue and profitability information received from Google relating to the main products and services through which Google directly and indirectly monetises its Mobile Platform's activities, including through its broader Mobile Ecosystem - namely advertising revenues, App Store revenues, other mobile services and the sale of Pixel devices.

8.11 We recognise that the profits earned on one product or service should not necessarily be considered in isolation from the other products and services within the same Mobile Ecosystem. Nevertheless, it is helpful to understand the extent to which distinct business activities are able to generate revenues over and above their directly attributable costs and we set out our analysis on an individual product/service basis below.

Mobile Search

8.12 The majority of Google's mobile revenues come from Google Search,[1051] including revenues relating to its ISA with Apple and its revenue sharing agreements with other OEMs.[1052] We estimate that Google's operating margin from Mobile Search Advertising averaged [✂] [50 – 75]% over the period 2022 to 2024 on a global basis,[1053] and is higher than for Google Services and its overall business.[1054]

[1050] Alphabet, 'Form 10-K for Alphabet INC filed 02/05/2025', accessed by the CMA on 16 July 2025.
[1051] Google's response to section 69 notice [✂].
[1052] Google's response to section 69 notice [✂]; Google's response to section 69 notice [✂].
[1053] As [✂], our operating profit estimate is based on Google's estimates of global operating profit margins including non-mobile as well as mobile activities.
[1054] Google's response to section 69 notice [✂].

8.13 Mobile search advertising revenues accounted for the majority, [✂]%, of UK mobile revenues, and [✂]% globally.[1055] Google generated £[✂] [5 – 10] billion of Mobile Search Advertising revenues in the UK,[1056] including in relation to its agreements with OEMs.

Play Store

8.14 Google also generates revenues through its Play Store, including from Play Store Advertising,[1057] which together accounted for approximately [✂] [0 – 20]% of UK mobile revenues and approximately [✂] [5 – 20]% globally.[1058] In the UK in 2024, Google generated revenues of £[✂] [0 – 2] billion from the Play Store (including from Play Store advertising),[1059] plus a further £[✂] [0-2] billion from in-app advertising.[1060] We estimate that the Play Store's operating profit margins averaged [✂] over the period 2022 to 2024 on a global basis[1061], and were higher than the operating margins for the Google Services reporting segment and Google overall.[1062]

Devices

8.15 When considering the profitability of Google's Mobile Platform activities, we have considered the devices within Google's Mobile Ecosystem as well as services, recognising that an end-user does not buy a Pixel mobile device in isolation.

[1055] Google's response to section 69 notice [✂].
[1056] Google's response to section 69 notice [✂]. Calculated as percentage of mobile revenues excluding revenues from Pixel devices, which were not available for the UK. Converted from USD to GBP at an average exchange rate of 1.2783 (Source: Bank of England).
[1057] Play Store Advertising refers to advertising activities reported within the Advertising revenue reporting segment in the Alphabet Group consolidated financial statements but which relate to the Play Store platform.
[1058] Google's response to section 69 notice [✂]. Calculated as percentage of mobile revenues excluding revenues from Pixel devices, which were not available for the UK.
[1059] App Store revenues may include revenues from sources other than Mobile Devices. Google's response section 69 notice [✂].
[1060] Google's response to section 69 notice [✂]. Converted from USD to GBP at an average exchange rate of 1.2783 (Source: Bank of England).
[1061] [✂], our operating profit estimate is based on Google's estimates of global operating profit margins including non-mobile as well as mobile activities.
[1062] Google's response to section 69 notice [✂].

8.16 Pixel Mobile Devices account for only a small proportion of mobile revenue, [✂].[1063] Google did not provide UK level revenues for Pixel Mobile Devices, but globally they account for [✂] [0-5]% of total mobile revenues in 2024.[1064]

Chrome and Android

8.17 We note that Google does not directly monetise its Chrome browser and browser engine, or its operating system (Android). However, even where the costs of providing these are taken into account, the global profits earned by Google from its mobile activities are still notably high.

8.18 We have assessed the consequences for global operating profit margins if these costs are allocated to the total Play Store (including advertising) and/or to Mobile Search Advertising,[1065] and found that:

(a) the Mobile Search Advertising operating margin for 2024 decreases by [✂] percentage points on a global basis, from [✂]% to [✂]% if we include Chrome and Android costs;[1066] and

(b) Play Store operating margins (including Play Store advertising) for 2024 reduce materially on a global basis, from [✂]% to [✂]%, if we include Android costs, but remain strong.[1067]

Other services

8.19 Google also generates revenues and operating profits relating to its Mobile Platform from other services within its Mobile Ecosystem, including from other mobile advertising and first party apps. In the UK, Google generated revenues of over £[✂] [0-2] billion from these services. [1068]

[1063] Google's response to section 69 notice [✂].
[1064] Google's response to section 69 notice [✂].
[1065]Google's response to section 69 notice [✂]. Mobile Search Advertising revenues are the search and search advertising product area revenues identified by Google as relating to mobile.
[1066] Google's response to section 69 notice [✂].
[1067] CMA analysis based on Google's response to section 69 notice [✂].
[1068] Google's response to section 69 notice [✂]. Converted from USD to GBP at an average exchange rate of 1.2783 (Source: Bank of England).

Profitability of Google's Mobile Platform in the UK

8.20 We estimate that Google generated UK revenues from its Mobile Platform in the region of £[✂] [10-20] billion[1069] in 2024 including:

(a) £[✂] [0-2] billion from the Play Store, including Play Store advertising, and a further £[✂] [0-2] billion from in-app advertising;[1070]

(b) £[✂] [0-2] billion from other non-advertising mobile revenues.[1071,1072]

(c) £[✂] [5-10] billion from Mobile Search Advertising; and

(d) £[✂] [0-2] billion from other mobile advertising.[1073]

8.21 Taking into consideration that Google's overall operating profit margin for its Mobile Platform,[1074] including in relation to profits generated indirectly through its broader Mobile Ecosystem, is higher than for its business as a whole, we consider Google's Mobile Platform activities are at least as profitable as the Alphabet Group.

8.22 Given the global nature of Google's cost reporting structures, and having seen no evidence that Google's mobile activities have materially higher operating costs in the UK, [✂], we estimate that Google's UK Mobile Platform activities are generating similar profit margins in the UK.

8.23 We estimate that these high returns mean that Google generated profits in 2024 from its Mobile Platform, both directly from Play Store, and indirectly through Android and Chrome, over and above a return based on its weighted average cost of capital.

[1069] Google's response to section 69 notice [✂]. Figures exclude revenues from Pixel devices which were available at the country level. However, Pixel devices accounted for [✂] [0 – 5]% of global and regional (EMEA) revenues, and are not expected to materially impact our UK profitability findings.
[1070] UK App Store revenue figure of £[✂] [0 – 2] billion has been calculated on a different basis from the mobile device revenues in Appendix A, and may include revenues relating to sources other than Mobile Devices.
[1071] Google's response to section 69 notice [✂].
[1072] Comprising revenue from [✂]. CMA analysis of Google's response to section 69 notice [✂].
[1073] Comprising revenue from [✂]. CMA analysis of Google's response to section 69 notice [✂].
[1074] See Appendix B for our approach to estimating operating profit margins for Google's Mobile activities.

Forecast information

8.24 We have reviewed Google's own financial projections relating to future revenues. We have not seen evidence indicating that Google's high levels of profitability will not continue.[1075]

Conclusion on Google's profitability

8.25 Google generates profits from its Mobile Platform from the Play Store (including Play Store Advertising), mobile search advertising, and other mobile advertising, and is earning significant profits from its Mobile Platform activities, including in the UK.

8.26 Our analysis indicates that Google was highly profitable for at least the last ten years, making high profits and a high return on capital, and forecasts we have seen indicate that these profits are expected to continue.

8.27 We estimate that its Mobile Platform activities in the UK have similarly generated a high return on capital relative to our estimate of Google's WACC over this period.

Competition to Google's Mobile Platform arising from wider technological, market, regulatory and other developments

This section sets out the extent to which wider technological, market, regulatory and other developments may exert a competitive constraint on Google's Mobile Platform, both now and in the future.

There are many ongoing developments which are likely to impact mobile platforms, most notably the rapid deployment and uptake of AI services. However, the evidence we have seen does not suggest that these developments (whether individually or in combination) are likely to be sufficient in scope, timeliness and impact to eliminate Google's substantial market power in relation to its Mobile Platform over the next five years.

[1075] See Appendix B.

Overview

8.28 In this section we first consider wider technological and market developments that could impact Google's position in mobile platforms over the next five years before assessing the impact of regulatory and other developments. In doing so, we consider whether there is evidence that such developments (whether individually or in combination) are likely to be sufficient in scope, timeliness and impact to eliminate Google's market power.[1076] Our assessment is relevant to whether Google's market power in its Mobile Platform is entrenched.[1077]

8.29 The CMA's starting point is to assess market conditions and market power at the time of SMS investigation. From that starting position, we consider the potential dynamics of competition over the next five years.[1078] Our approach to assessing SEMP involves considering the sources of Google's market power in the round and whether these are likely to remain in the future. This includes the extent to which Google's market power has persisted in the past and through previous market developments.[1079] This section therefore forms part of our overall assessment of whether Google holds an entrenched market position.

Technological and market developments

8.30 In carrying out our assessment of technological and market developments:

(a) We gathered information to identify which developments are likely to impact on competition in mobile platforms over the next five years. Our sources included previous CMA horizon scanning work,[1080,1081] submissions from Google, Apple and third parties, as well as Google's internal documents.

(b) We investigated how these developments are likely to impact mobile platforms and, more specifically, whether any of these developments are likely to impact Google's position in its Mobile Platform over the next five

[1076] CMA194, paragraphs 2.60 and 2.62
[1077] CMA194, paragraph 2.56
[1078] We take into account any expected or foreseeable developments that may affect the firm's conduct in respect of the digital activity if the firm was not to be designated. CMA194, paragraph 2.57.
[1079] CMA194, paragraph 2.61
[1080] Top 10 technologies – a CMA horizon scanning perspective – Competition and Markets Authority
[1081] Trends in Digital Markets: a CMA horizon scanning report - GOV.UK

years.[1082] We assess the impact of each of these developments in turn below.

(c) We considered a wide range of cross-cutting evidence that is not specific to the impact of individual market or technological developments to assess more broadly whether the position of Google's Mobile Platform overall is likely to be impacted over the next five years (eg due to a combination of technological developments and/or other factors). This analysis draws on our assessment of barriers to entry and expansion in mobile platforms and our forward-looking profitability analysis in Chapters 6 and 7 as well as elsewhere in this chapter.

The key market and technological developments impacting mobile platforms over the next five years

8.31 We find that the following wider technological and other developments are likely to be most relevant for competition in mobile platforms in the next five years: AI, connected devices and emerging device forms such as smartwatches and AR/VR devices, edge computing, advances in network connectivity, and cross-platform gaming (eg handheld gaming devices).

(a) We have considered Google's submissions that its position in respect of its Mobile Platform is not entrenched due to technological developments (including AI, wearable devices and AR/VR devices), competition from new and emerging OSs, intensifying competition for game distribution on Android (eg cloud gaming platforms and handheld gaming devices)[1083] and the growth of Apple's Mobile Devices in lower price tiers.[1084]

(b) We asked Google for its internal documents that relate to the competitive trends affecting its Mobile Ecosystem over the next five years, as well as to any potential disruptions to its competitive position in this period. Google submitted documents that referred to developments such as the increasing use of connected devices, an increase in premiumisation of Mobile

[1082] The fact that important technological and market developments are likely to impact competition in Mobile Platforms in the next five years does not necessarily suggest that Google's position is not entrenched. We address Google's submissions in relation to this point in the sub-section titled 'Artificial Intelligence' below.
[1083] We consider the impact of games distribution platforms on a forward-looking basis in Chapter 7
[1084] Submission from Google, [✂]. Google's response to section 69 notice [✂].

Devices, the integration of AI in mobile, the expansion of cross-platform gaming, and advancements in satellite connectivity.[1085]

(c) We also asked Google, Apple and third parties what they considered to be the key technological and market developments in mobile platforms over the next five years.

(i) A range of third parties told us that AI is the technological trend that could most impact the supply of mobile platforms over the next five years.[1086] AI was frequently mentioned as a technological or market development in the responses we received to our Proposed Decision.[1087]

(ii) Some third parties (including connected devices providers and app developers)[1088] submitted that connected devices and AR/VR will have an increasing – albeit limited[1089] – role in competition in mobile platforms over the next five years.

(iii) Third parties mentioned other developments that may have an impact on mobile platforms over the next five years, including

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[1085] Google's internal documents submitted to the CMA: [✂].

[1086] Note that as part of this assessment, we asked a range of market participants 'What do you consider to be the most significant technological developments that you expect to have an impact on Mobile Ecosystems by the end of 2030?'. We also asked parties to rate a list of technological developments which included AI in terms of impact on Mobile Ecosystems by the end of 2030, whereby the rating corresponds to one of the following descriptors: 'no impact', 'limited impact', 'some impact' 'substantial impact' or 'very substantial impact' (note the question also asked the parties to consider the developments' impact on 'competitive dynamics in Mobile Ecosystems by the end of 2030'). 15 parties expected AI will have a 'very substantial' impact with a further 4 parties expecting it to have a 'substantial impact'. Only 3 parties expected that AI will have a less-than-substantial impact. We also asked parties about the potential impact of other technological trends, but overall parties did not rate the potential impact of any other trend as highly as AI. Apple's response to section 69 notice [✂]. Google's response to section 69 notice [✂]. 20 responses to section 69 notices: [✂]. Separately, we asked the same parties the following: 'Please specify whether, and if so how, you consider these developments might, by the end of 2030, substantially impact Apple's and Google's respective market positions in Mobile Ecosystems, including but not limited to their positions in the following three components: i) Mobile Operating Systems, ii) Native App Distribution, and iii) Mobile Browsers.' This evidence is discussed below in the section that considers the impact of the future developments on the position of Google's Mobile Platform over the next five years.

[1087] 9 responses to the CMA's Proposed Decision: Mozilla (page 6), Coalition for App Fairness (page 4), Information Technology and Innovation Foundation (page 4), Consumer Choice Center (page 4), Innovate Finance (page 3), International Center for Law and Economics (page 14), Radiocentre (page 3), Computer and Communications Industry Association (page 1), Which? (page 4).

[1088] 7 parties total. 6 responses to section 69 notices; [✂]. 1 response to the CMA's invitation to comment: [✂] Financial services firm B (paragraph 28-29).

[1089] Some respondents considered connected devices and AR/VR will have a limited impact on Mobile Platforms over the next five years. This was because of AR/VR devices not having a significant commercial impact, because of limited scope for future market disruption given this trend is largely a continuation of AR/VR trends in the past, or because Mobile Platform incumbents are already vertically integrated which creates 'ecosystem blocks' to competitive disruption (see [✂] response). 9 responses to section 69 notices: [✂]. 1 note of meeting: [✂]. Some additional parties considered these trends will have 'some' impact, but not a 'substantial' impact, on Mobile Platforms over the next five years or that it is 'unclear' what impact will result. 6 responses to section 69 notices: [✂].

advances in network connectivity and edge computing.[1090,1091] Third parties also mentioned cross-platform gaming (ie via portable handheld gaming devices) and emerging modes of accessing digital content (eg web apps and 'super apps')[1092] – these developments are considered in Chapter 7.

The impact of these market and technological developments on the position of Google's Mobile Platform over the next five years

8.32 Having identified the key market and technological developments with the potential to impact competition in mobile platforms, we then considered whether any of these developments, whether individually or in combination, are likely to impact Google's position in its Mobile Platform over the next five years.

Artificial intelligence (AI)

8.33 AI features are increasingly being integrated into Mobile Devices, enhancing applications as well as web-based content and OS-level features. Evidence we have seen indicates that AI may have the following impacts on mobile platforms over the next five years, with some of these impacts already taking place:

(a) AI developments are likely to enhance services available to users on Mobile Devices – for example, by creating scope for operating systems to incorporate new AI-based features and functionalities.[1093,1094] While these new AI-based features and functionalities provide scope for further differentiation of mobile ecosystems, that scope will depend on whether Mobile Devices have sufficient computational power for performing AI-related tasks.[1095] As such, AI developments are likely to continue to place a significant emphasis on hardware capabilities of mobile ecosystems

[1090] 3 responses to section 69 notices; [✂]. 3 responses to the CMA's invitation to comment: BT (paragraphs 5 and 7); Mobile UK (paragraphs 8-10); Three (pages 2-3). Note of meeting [✂].
[1091] Parties responses to section 69 notices; [✂].
[1092] For examples, 3 responses to section 69 notices; [✂]. 2 notes of meetings; [✂]. Parties' responses to the CMA's Proposed Decision; Information Technology and Innovation Foundation (page 3), Consumer Choice Center (page 4), and Which? (page 4).
[1093] 5 responses to section 69 notices; [✂].
[1094] AI-based applications often rely on access to operating system and hardware features (eg microphone and camera) to enable voice, image and video capabilities. As agentic AI capabilities improve, operating systems may also have to support AI agents that help to manage low-level operating system tasks. As a result, operating systems are increasingly embedding AI-enabling features (eg voice assistants) into their core functionality. This could reinforce the central role of the operating system as the enabler for apps, data, and hardware access on a mobile device.
[1095] FM services generally require more powerful on-device hardware (eg GPUs, NPUs, memory). This is driving a focus towards higher-performance hardware design, including AI-optimised chips.

which can reinforce some of the barriers to entry and expansion related to resources and expertise (see section 'Barriers relating to Mobile Devices').[1096] This might have a similar impact on emerging AI-based device forms such as wearables and AR/VR hardware, which we discuss separately in the following sub-section.

(b) Furthermore, AI developments – particularly AI assistants – could alter how users interact with their Mobile Devices and the content and services available on those devices. AI has enabled new apps (eg AI chatbots such as ChatGPT and AI-based browsers) and created new ways of interacting with existing apps (eg using conversation to edit photos in Google Photos). Additionally, the emergence of AI-powered functionalities of Apple's Siri, Google's Gemini and Amazon's Alexa means that users may increasingly access content on their Mobile Devices through those rather than navigating directly to native apps and mobile browsers. However, while such AI capabilities may impact the operating system on a forward-looking basis since aspects of AI may be integrated into the operating system itself, [1097] the operating system will continue to play an intermediary role. AI will likely continue to rely on integration across layers of the operating system, which may reinforce the central role of the operating system as the enabler for apps, data, and hardware access.[1098]

(c) Finally, by changing how users access and interact with content on their mobile ecosystems, AI developments are also spurring content and service developers to innovate and update their apps with new AI features, and they may also impact the ways in which app and web developers compete to reach and be discovered by users.[1099] For example, instead of directly accessing an app or website, users might ask their AI assistant to

[1096] For example, see Smartphone maker Nothing raises $200 million at $1.3 billion valuation | Reuters, accessed by the CMA on 19 September 2025 and Galaxy AI | AI Features and Benefits | Samsung UK | Samsung UK, accessed by the CMA on 19 September 2025.
[1097] On the latest versions of Android and iOS, many third-party app developers use in-built services from the operating system itself in order to run machine-learning models or to call upon the compute power of AI-processing chips on the device. These in-built services (eg LiteRT or Apple's CoreML) are provided in conjunction with the operating system, and they enable app developers to run AI tasks faster and with less investment because the app developer does not need to call upon the on-device AI compute power more directly – instead, app developers can use this 'packaged', intermediary service provided as part of the operating system.
[1098] For example, see submission from [✂].
[1099] For example, see What is Meta AI: everything you need to know about the social network's AI chatbot | TechRadar, accessed by the CMA on 19 September 2025 and Introducing My AI Snaps, accessed by the CMA on 19 September 2025.

perform tasks on their device for them – the AI assistant would then act as a gateway to app functionality or web content.

8.34 However, evidence we have seen indicates that Google is likely to be able to adapt successfully to this development by integrating AI into its own Mobile Devices, and that barriers to competition in mobile platforms are likely to persist.

(a) Google submitted that AI may become a key differentiator between competing mobile operating systems and create a 'dynamic and profoundly novel environment where AI capabilities might have a more direct impact on mobile OSs in numerous ways, including from the OS integration of AI-powered apps and services'.[1100] Google also submitted that AI is intensifying competition in mobile browsers, which we address in more detail in the section titled 'Competition from alternatives to Google's Mobile Browser and Browser Engine' in Chapter 7.[1101]

(b) This is consistent with Apple's submissions that AI has intensified competition in the supply of Mobile Platforms [✂]. Apple also submitted that the impact of AI is likely to grow in future.[1102]

(c) However, our analysis of Google's internal documents suggested that Google does not consider AI as a significant threat to its position. Google's internal documents [✂][1103] [✂].[1104]

(d) Additionally, a range of third parties held the view that AI is not likely to impact significantly Google's position in respect of its Mobile Platform over the next five years.[1105]

(i) Consistent with our analysis above on the impact of AI on mobile platforms, third parties considered that AI will enhance the capabilities of mobile platforms and change how users interact with mobile content.[1106] A range of submissions indicated that Google can adapt to and leverage AI developments to enhance its Mobile

[1100] Google's response to section 69 notice [✂].
[1101] Submission from Google, [✂].
[1102] Apple's response to section 69 notice [✂].
[1103] Google internal documents: [✂].
[1104] Google's internal documents: [✂].
[1105] 12 responses to section 69 notices: [✂]. 3 responses to the CMA's invitation to comment: DMG Media (paragraph 2); Coalition for App Fairness (page 3); [✂] Financial services firm B (page 8). 2 notes of meetings: [✂]. 2 responses to our Proposed Decision: Mozilla (page 6); Coalition for App Fairness (page 4).
[1106] 22 responses to section 69 notices; [✂].

Platform in this way, such that Google's position is unlikely to be substantially impacted by AI.[1107] Some parties' responses suggested this is in part because Google has an incumbency advantage in adopting technologies such as AI as the owner of the Android Mobile Platform.[1108] One party also noted that AI does not appear to affect Google's revenue model underlying its Mobile Ecosystem.[1109]

(ii) The above is consistent with our conclusions in Chapter 7 that the evidence does not demonstrate that AI developments are likely to impact significantly Google's position in mobile content provision and distribution within Google's Mobile Ecosystem over the next five years.

(iii) Some third parties also considered that barriers to entry and expansion in mobile platforms (discussed in Chapter 6 section titled 'Barriers to entry and expansion in Mobile Platforms') such as indirect network effects, economies of scale, and user inertia were unlikely to be diminished by AI developments,[1110] with some parties' submissions indicating these barriers may prevent third-party AI rivals from substantially impacting Google's position in mobile platforms.[1111] Furthermore, some third-party submissions indicated that the increased integration of AI into Mobile Devices is likely to reinforce barriers to competition in Mobile Platforms.[1112] This is because developing a highly integrated platform that facilitates smooth interactions between different products and services across the operating system to compete effectively with Google's Mobile Platform[1113] would be costly.[1114]

[1107] 10 responses to section 69 notices; [✂]. 2 responses to the CMA's invitation to comment: Coalition for App Fairness (page 3); [✂] Financial services firm B (page 8). Note of meeting with [✂]. 2 responses to our Proposed Decision: Mozilla (page 6); Coalition for App Fairness (page 4).

[1108] 7 responses to section 69 notices; [✂]. 3 responses to our Proposed Decision: Mozilla (page 6); Coalition for App Fairness (page 4), Which? (page 4).

[1109] [✂] response to section 69 notice [✂].

[1110] 2 responses to section 69 notices; [✂].

[1111] 2 responses to section 69 notices; [✂].

[1112] 3 responses to section 69 notices; [✂].

[1113] For example, see AI on Android: AI-enabled features for your phone | Android, for examples of use cases of AI on Android Mobile Devices, accessed by the CMA on 27 June 2025.

[1114] 2 responses to section 69 notices; [✂]; and see also public articles which suggest Apple and Google are spending a significant amount to develop and integrate AI for their Mobile Ecosystems. For example: Apple will spend more than $500 billion in the U.S. over the next four years - Apple, accessed by the CMA on 11 June 2025; and Google plans $75B investment to build out cloud AI capacity | CIO Dive, accessed by the CMA on 11 June 2025.

(iv) Consistent with the above, a range of third parties further submitted that Google may be able to use AI to strengthen and further entrench its position in respect of its Mobile Platform and Mobile Ecosystem.[1115] For example, Google's position as the operating system provider may enable it to gain a competitive advantage relative to third-party providers of FM services and wider content,[1116] particularly if Google can use AI to disintermediate between end-users and third-party content and service providers.[1117]

(e) In line with these third-party responses, we understand Google has recently launched several AI-related features and services for its Mobile Platform and has generally received positive public reactions to these releases.[1118] Indeed, in Google's most recent earnings call, Google was optimistic about the impact of AI on the success of its Mobile Platform and related Google products and services.[1119] This is also consistent with evidence we have seen in some third-party investor reports, which considered that Google has successfully integrated AI into its Mobile Platform so far and that AI was enabling Google to advance its position relative to Apple's iOS Mobile Platform.[1120]

(f) Finally, in response to the Proposed Decision, Google submitted that third parties' views in relation to the future impact of AI and other developments effectively confirm that its position is not entrenched. Google submitted that the majority of respondents to the CMA's questionnaire consider that over the next five years: (i) AI is likely to substantially disrupt Google's

[1115] 7 responses to section 69 notices; [✂]. 3 responses to the CMA's invitation to comment: Coalition for App Fairness (page 3); [✂] Financial services firm B (page 8); BBC (page 5). Note of meeting [✂].
[1116] 3 responses to section 69 notices; [✂]. Which?'s response to proposed decision, dated 20 August 2025.
[1117] 5 parties responses to section 69 notices: [✂]. BBC's response to the CMA's invitation to comment, paragraph 25. Mozilla's response to proposed decision, dated 23 July 2025, page 6.
[1118] For example, coverage of Google's product release announcements in May 2025 wrote 'Google to cement Gemini as a leader in AI', Google I/O 2025 as it happened: AI Search, Veo, Flow, Gemini, Android XR, and all the big announcements | TechRadar, accessed by the CMA on 19 September 2025. An article covering the release of new AI features in Chrome suggests that 'the prevalence of Chrome will get the [agentic browsing assistant] technology in front of many more people', Google announces massive expansion of AI features in Chrome - Ars Technica, accessed by the CMA on 19 September 2025. An article on Google's new Pixel 10 phones describes this device as 'the most competitive Pixel so far' with some 'mind-blowing' AI features, https://www.techradar.com/phones/google-pixel-phones/google-pixel-10-review accessed by the CMA 19 September 2025.
[1119] Philipp Schindler commented on how Circle to Search, which incorporates new AI capabilities, is now available on over 300 million Android devices'. In addition, Sundar Pichai commented on growth in the Gemini app which 'now has more than 450 million monthly active users and we continue to see strong growth and engagement'. 2025 Q2 Earnings Call - Alphabet Investor Relations, accessed by the CMA on 19 September 2025.
[1120] Investor reports: Bank of America, 'Let's Chat AI – Post(ings) at the intersection of Internet and AI'; Baptista, '2025-08-23-AAPL.OQ-Baptista Research-Apple Is Falling Behind Is Google Winning The Smartphone AI'; Equisights, '2025-07-03-AAPL.OQ-EQUISIGHTS-Apple's Big (Non-AI) Win Siri's Outsourced Brain Puts Moat'.

position in respect of its Mobile Platform, and (ii) a substantial change to Google's position is expected. Google further submitted that third-party responses were contradictory and resolved against a finding of SEMP.[1121]

(g) We disagree with these submissions for the following reasons:

(i) As noted above, while third parties stated AI would have a significant impact on mobile platforms, such statements were about AI's impact on the nature of competition in relation to mobile platforms – eg due to the integration of AI into key mobile-related products and services. These third-party statements do not directly address how Google's position in mobile platforms might be impacted by AI and, as we explain above, third-party submissions generally indicated that AI developments are unlikely to impact significantly Google's position.

(ii) Linked to this, responses cited by Google as being contradictory or inconsistent with a finding of SEMP relate to different questions that the CMA asked in its questionnaire. We do not consider these responses to be contradictory. As explained above, we firstly asked parties more generally about the impact of technological developments such as AI on competition in mobile ecosystems over the next five years. We then asked more specifically about the impact of these developments on Google's Mobile Ecosystem within the same time period. The responses to this latter question informed our assessment of the impact of AI on Google's Mobile Platform over the next five years.

Connected devices, AR/VR products and emerging mobile device forms

8.35 Connected devices, AR/VR products and emerging mobile device forms are experiencing growth in the UK, with new products advancing technologically (including by incorporating AI)[1122] such that many of these devices can mimic certain features and aspects of mobile platforms. For example, they can enable users to access many of their apps, web content and AI assistants on their connected watch or smart glasses instead of via their mobile device and

[1121] Google's response to the Proposed Decision, [✂].
[1122] For example, OpenAI's Upcoming AI Device: Here's What We Know, accessed by the CMA on 19 September 2025; Meta Ray-Ban Display: AI Glasses With an EMG Wristband, accessed by the CMA on 19 September 2025; Meta's new Ray-Ban Display smart glasses have a UK release date | The Independent, accessed by the CMA on 13 October 2025; and Wearables in the UK- statistics & facts | Statista, accessed by the CMA on 13 October 2025.

therefore could provide an alternative for accessing and distributing content on mobile ecosystems.

8.36 Consistent with the above, Google submitted that wearables have increased in popularity over the last decade [✂] mobile platforms.[1123] Specifically, it submitted that innovation in wearable technology incentivises mobile operating systems to maintain high levels of compatibility with wearables[1124] in order to gain a competitive advantage.

8.37 However, our analysis of Google's internal documents did not suggest that AR/VR technology is a substantial threat to Google's position. [✂][1125] [✂].[1126] Indeed, internal documents indicate that [✂] and we understand that Google announced Android XR, an operating system for extended reality devices in 2024.[1127,1128]

8.38 Our analysis of submissions from third parties who commented explicitly on how the position of Google's Mobile Platform may change in future[1129] did not suggest that connected devices, AR/VR or other emerging device forms are likely to change significantly (in a weakening or negative sense) Google's position over the next five years. Indeed, third-party submissions suggest these devices are likely to remain dependent on smartphones over the next five years (eg because they rely on interoperability with mobile device operating systems)[1130], such that they are more likely to remain complementary products to Google's Mobile Platform during this period.[1131]

8.39 For example, a smart glasses provider [✂] submitted that [✂], this is very unlikely to take place within the next five years, during which time its devices are likely to remain complementary to smartphones. The provider is seeing growth in sales of its smart glasses, but its overall sale numbers are not yet

[1123] Google's response to section 69 notice [✂].
[1124] This is because AR apps rely on certain APIs provided by the OS provider in order to function effectively.
[1125] Google internal documents [✂].
[1126] Google internal document [✂].
[1127] Google internal document [✂].
[1128] See Android XR: A new platform built for headsets and glasses, accessed by the CMA on 8 July 2025.
[1129] For the list of third parties who commented explicitly on how Google's position in its Mobile Platform may change over the next five years, see footnote in the sub-section titled 'Impact on overall position of Google's Mobile Platform over the next five years'.
[1130] Note of meeting with [✂]. [✂] response to section 69 notice [✂].
[1131] 3 responses to section 69 notices; [✂]. 2 notes of meeting; [✂].

comparable to those of smartphones.[1132] Additionally, the provider told us there are technical limitations currently preventing smart glasses from 'replacing' traditional smartphones – for example, the glasses are too small to contain sufficient battery and processing power.[1133] Moreover, an external article cited by Apple in its response to our Proposed Decision in the SMS investigation into Apple's mobile platform suggests that despite the emergence of AI wearable devices, smartphones are likely to remain 'the most important device for personal use in 10 years'.[1134]

8.40 Furthermore, some third parties submitted that the trend towards increasing usage of connected devices and AR/VR products may further entrench Google's position in its Mobile Ecosystem.[1135] As noted above, some parties submitted that connected devices are likely to remain dependent on smartphone connections over the next five years,[1136] such that Google's control over this connection could enable it to raise barriers to user switching between mobile platforms (for example due to the user lock-in effects of connected devices as discussed in Chapter 6 section titled 'Competition for end-users: End-user switching between Apple and Google Mobile Ecosystems'), which may reinforce barriers to entry and expansion at a mobile ecosystem level (see Chapter 6 section titled 'Mobile ecosystem level barriers').[1137]

Other market and technological developments

8.41 As noted above, some third parties submitted that developments other than those discussed above could impact competition in mobile platforms.

8.42 Third parties generally considered that where mobile is concerned, technological developments relating to edge compute form part of the trends related to AI and, as discussed above, our analysis of views from third parties on these trends suggests they are unlikely to change significantly Google's position in respect of its Mobile Platform.[1138] This is because parties referred to

[1132] The smart glasses provider [✂] estimated sales of [✂] [0 – 5] million devices globally [in an approximately 1-and-a-half-year period] [✂], which corresponds to just a small fraction of smartphone sales – indeed, in 2024 1.24 billion phone shipments were made according to public sources. Worldwide Smartphone Shipments Grew 6.4% in 2024, Despite Macro Challenges according to IDC, accessed by the CMA on 1 October 2025. Note of meeting with [✂].
[1133] Note of meeting with [✂].
[1134] Nothing CEO Carl Pei Shares Plans For Selling Smartphones In The U.S. accessed by the CMA on 10 September 2025.
[1135] [✂] response to section 69 notice [✂]. Note of meeting with [✂].
[1136] 2 responses to section 69 notice; [✂]. Note of meeting with [✂].
[1137] 2 responses to section 69 notice; [✂]. Note of meeting with [✂].
[1138] 6 responses to section 69 notices; [✂].

how advancements in edge compute will facilitate processing for AI products and services (eg via on-device AI chips), such that integrating AI into mobile depends in part on a firm's ability to harness advances in edge compute.[1139]

8.43 Some third parties[1140] mentioned advances in network connectivity (eg network slicing) but one party[1141] noted that it is unclear when these trends will take place, such that it is unclear whether they will take effect soon enough to have a significant impact over the next five years. In any case, no third party submitted that this trend is likely to diminish Google's position in respect of its Mobile Platform or wider Mobile Ecosystem.[1142] Further, some third parties submitted that as the operating system provider Google will remain in control of this development because Google can control how third-party connectivity providers interact with end-users on Android Mobile Devices and potentially influence how those providers offer their services.[1143]

8.44 We have not seen evidence nor had submissions relating to the impact of developments in edge compute and network connectivity to suggest that these developments are likely to impact Google's position significantly in respect of its Mobile Platform over the next five years.

Impact on overall position of Google's Mobile Platform over the next five years

8.45 We also considered evidence on whether the position of Google's Mobile Platform as a whole (eg due to a combination of factors) is likely to be impacted over the next five years. Overall, the evidence suggests that a significant impact in this time period is not likely:

(a) We considered Google's submissions in response to the CMA's Proposed Decision that the Play Store's share of revenue across Mobile Devices in the UK is falling and this would be inconsistent with a finding that Google has substantial and entrenched market power, particularly on a forward-looking basis.[1144] We further address this submission above in Chapter 6. We also address Google's submissions on the trend of increasing

[1139] 2 responses to section 69 notices; [✂].
[1140] 3 responses to section 69 notices; [✂]. 3 responses to invitation to comment: BT (paragraphs 5 and 7); Mobile UK (paragraphs 8-10); Three (pages 2-3).
[1141] Note of meeting with [✂].
[1142] Although, note that one app developer submitted that, in relation to the impact of connectivity advances, Apple and Google are likely to leverage their resources to stay competitive but a failure to innovate could erode their position by 2030. [✂] response to section 69 notice [✂].
[1143] 2 responses to the CMA's invitation to comment; Mobile UK (paragraphs 8-10) BT (paragraphs 5-8).
[1144] Google response to Proposed Decision, paragraph 61.

premiumisation of Mobile Devices and Apple's expansion in lower-priced device tiers in the section titled 'Competition for end-users'.

(b) Evidence from respondents[1145] who provided a view on the future of mobile platforms overall indicated that third parties generally do not expect significant change to Google's position over the next five years.[1146] However, some respondents (industry bodies, including some which Google is a member of) did submit explicitly that Google does not have substantial market power and/or that competition in mobile platforms is dynamic, such that Google's position could be eroded.[1147]

(c) Furthermore, evidence from a range of third parties indicated that Google's ability to leverage between different parts of its Mobile Platform and to adjacent markets is likely to increase or be strengthened due to technological developments.[1148,1149]

(d) Our analysis of Google's internal documents did not suggest that any future trends are likely to impact significantly the overall position of Google's Mobile Platform over the next five years. While documents provided by Google show that Google monitors certain technological and market developments that will impact competition in mobile platforms (eg AI), Google's internal documents do not appear to identify any substantial

[1145] 10 responses to section 69 notices; [✂]; 3 notes of meetings: [✂]; 3 responses to invitation to comment; DMG Media (paragraph 2); Coalition for App Fairness (page 3); [✂] Financial Service Firm B (paragraphs 25). 7 responses to our Proposed Decision: Mozilla, page 6; Epic, pages 7 and 8; Coalition for App Fairness (page 4); Financial Services Firm (page 9) [✂]; [✂] Anonymous (page 5); [✂].

[1146] As well as asking stakeholders about specific market and technological developments, we asked third parties more generally how they expect Google's position in Mobile Ecosystems will evolve over the next five years.

[1147] 2 responses to invitation to comment: CCIA (page 3); Chambers of Progress (page 2). 4 responses to the CMA's Proposed Decision; Information Technology and Innovation Foundation (page 3); Consumer Choice Centre (page 4), International Center for Law and Economics (page 2), CCIA (pages 1 and 2). International Center for Law & Economics is a privately-funded research organisation focused on law and economic policy. The Computer & Communications Industry Association (CCIA) is a non-profit trade association for companies in the computer, internet, IT and telecommunications industries. Chamber of Progress is an American trade group that represents technology companies. Information Technology and Innovation Foundation (ITIF) is a public policy think tank focussed on public policy around industry and technology. Note that public websites accessed by the CMA on 26 September 2025 show Google is listed as a member, partner or supporter of the following industry bodies: CCIA Members - CCIA (member); Chamber of Progress Partners - Chamber of Progress (partner); and the ITIF Our Supporters | ITIF (supporter).

[1148] 15 responses to section 69 notices; [✂]; 2 notes of meeting: [✂]; 3 responses to the CMA's invitation to comment: DMG Media (paragraph 2); Coalition for App Fairness (page 3); [✂] Financial Service Firm B (paragraphs 26-29). Coalition for App Fairness response to Proposed Decision, page 4. Mozilla response to Proposed Decision, page 6.

[1149] We asked third-party stakeholders whether they expected technological developments will affect Google's ability to use its position in relation to various components of its Mobile Platform (ie Android, Chrome and the Play Store) to reinforce or improve its position in Mobile Platforms and related markets over the next five years.

threats to Google's position but instead see the trends as an opportunity to increase monetisation across its Mobile Platform.[1150]

(e) The above is consistent with our assessment of Google's own financial projections of future revenues and profitability in relation to its Mobile Platform activities. We have not seen evidence indicating that Google's high levels of revenue and profitability will not continue. (see earlier in this chapter for detail).

(f) Finally, this is also consistent with our conclusion that there are significant barriers to entry and expansion in mobile platforms that act to hamper the potential for technological and market developments to impact significantly on Google's position. Indeed, submissions from a range of third parties indicate that the barriers to competition relating to mobile platforms (and/or relating to mobile browsers, native app distribution, and operating systems individually) that we identify in Chapter 6 and Chapter 7 (ie barriers arising from economies of scale and scope, network effects, Google's conduct, as well as barriers to user switching) are unlikely to change significantly over the next five years.[1151]

Regulatory and other developments

8.46 In this section we consider the scope for other developments – in particular, legislation, regulatory action and litigation – to impact Google's market power in respect of its Mobile Platform over the next five years.

8.47 Google has significant global operations and it is not possible to anticipate every such development; however, we have set out below the regulatory and other developments (both within the UK and internationally) that we consider have the most potential relevance to our assessment of whether Google has substantial and entrenched market power in respect of its Mobile Platform.

Developments in the UK

8.48 The following developments are taking place within the UK:

[1150] Google's internal documents: [✂].
[1151] 10 responses to the CMA's section 69 notices; [✂]. Note that one party submitted barriers to user switching 'may' reduce due to technological advancements as well as increased interoperability between operating systems. [✂] response to section 69 notice [✂].

(a) The CMA has recently designated Google as having SMS under Part 1 of the Act in relation to the provision of general search services (the Search SMS Designation);[1152]

(b) Google is also currently the subject of an ongoing CMA investigation under the Competition Act 1998 into whether it has abused a dominant position through its conduct in ad tech (the CA98 Investigation);[1153]

(c) proceedings have been brought against Google in the Competition Appeal Tribunal (**the CAT**) alleging abuses of dominance in relation to native app distribution;[1154]

(d) proceedings have been brought against Google in the CAT alleging abuses of dominance in relation to search, among other things;[1155] and

(e) Apple has also been designated with SMS under Part 1 of the Act in relation to the provision of its Mobile Platform (the Apple Mobile SMS Designation).[1156]

8.49 We do not consider that these developments (whether individually or in combination) are likely to impact significantly Google's market power in respect of its Mobile Platform in at least the next five years. In particular:

(a) the Search SMS Designation, the CA98 Investigation and the CAT proceedings relating to search, concern activities that, although related (eg mobile platforms are an important access point for Google's general search services), are separate from Google's provision of its Mobile Platform; and

(b) moreover, the outcome of each of these developments is uncertain, since:

[1152] See the CMA's decision to designate Google as having strategic market status in respect of general search services, dated 10 October 2025.
[1153] Investigation into suspected anti-competitive conduct by Google in ad tech - GOV.UK.
[1154] Including 1408/7/7/21 Elizabeth Helen Coll v Alphabet Inc. and Others | Competition Appeal Tribunal; 1378/5/7/20 Epic Games, Inc. and Others v Alphabet Inc., Google LLC and Others | Competition Appeal Tribunal; 1673/7/7/24 Professor Barry Rodger v (1) Alphabet Inc; (2) Google LLC; (3) Google Ireland Limited; (4) Google Asia Pacific Pte Limited; (5) Google Commerce Limited; (6) Google Payment Limited; and (7) Google UK Limited | Competition Appeal Tribunal.
[1155] Including 1606/7/7/23 Nikki Stopford v (1) Alphabet Inc.; (2) Google LLC; (3) Google Ireland Limited; and (4) Google UK Limited | Competition Appeal Tribunal; 1720/7/7/25 Or Brook Class Representative Limited v Google Inc & Others | Competition Appeal Tribunal
[1156] Apple's Mobile Platform is described in the CMA's decision as including Apple's iOS, iPadOS, the App Store, Safari and the Webkit browser engine.

(i) following the Search SMS Designation, the precise nature and scope of any interventions imposed on Google during any five-year designation period will need to be defined and consulted on. Any potential impact on Google's market power in respect of its Mobile Platform on a forward-looking basis therefore remains uncertain;

(ii) the CA98 Investigation is ongoing and no decision has been made as to whether Google has committed an infringement and, if so, what action the CMA should take;[1157]

(iii) at the time of this decision there can be no certainty as to the outcome of the collective proceedings claims (both in terms of whether the claims will succeed and what, if any, remedies may be ordered);

(iv) following the Apple Mobile SMS Designation, the precise nature and scope of any interventions imposed on Apple during the five-year designation period will need to be defined and consulted on. Any potential impact on Google's market power in respect of its Mobile Platform on a forward-looking basis therefore remains uncertain.

International developments

8.50 In addition to the developments within the UK, the following are taking place internationally:

(a) Alphabet Inc., together with its subsidiaries, has been designated as a 'gatekeeper' under the EU's Digital Markets Act[1158] (**the DMA**) in respect of certain 'core platform services', including its operating system (Android), its online intermediation service (Google Play) and its web browser (Chrome),[1159] and is therefore subject to certain obligations;[1160]

[1157] In September 2024, the CMA issued a statement of objections provisionally finding that Google had abused its dominance by 'self-preferencing' its own ad exchange. The CMA is considering Google's representations on the statement of objections.
[1158] Regulation (EU) 2022/1925 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828 (Digital Markets Act) [2022] L 265/1.
[1159] European Commission decision of 5 September 2023 addressed to Alphabet Inc.
[1160] The prohibitions and obligations for gatekeepers are set out in Articles 5, 6 and 7 of the DMA. Google's obligations include: (i) allowing third parties to interoperate with Google's services; (ii) allowing business users to communicate offers and conclude contracts with their customers outside of Google's ecosystem; (iii) not requiring users to use Google's own payment system for in-app purchases; (iv) not using non-public data in competition with business users; (v) enabling users to uninstall any pre-installed software or app and change default settings; (vi) enabling the installation of third-party app stores; (vii) not treating Google's products and services more favourably in

(b) In the US, remedies have been, or may be, imposed in the following cases:

(i) A case brought by Epic Games, in which Google has been found to have violated US antitrust laws in relation to app distribution;[1161]

(ii) Two separate cases brought by the US Department of Justice, in which Google has been found to have violated antitrust law in relation to the markets for 'general search services' and 'general search text advertising', among others;[1162]

(c) Google has been designated by the Japan Fair Trade Commission as a specified software operator under the Mobile Software Competition Act[1163] and will therefore be subject to certain prohibitions and obligations in relation to the provision of smartphone software;[1164] and

(d) On 3 December 2024, the Brazilian Competition Authority (**CADE**) initiated an investigation following complaints alleging that Google forces app developers to use Google's payment platform, discourages users from sideloading apps, and restricts alternative app stores.[1165]

8.51 We do not consider that these developments (whether individually or in combination) are likely to impact significantly Google's market power in respect of its Mobile Platform in the UK in at least the next five years.

8.52 In relation to the DMA:

(a) the effect of Google's obligations under the DMA on the provision of its Mobile Platform in the UK are, and will remain, unclear, since the territorial reach of the DMA does not extend to the UK.[1166] One possible outcome is that Google may carve out the UK market (and other territories outside the

ranking than similar third-party services or products; (viii) providing portability of end-user data; and (ix) applying fair, reasonable and non-discriminatory conditions of access for app developers to the Play Store.

[1161] *Epic Games, Inc. v. Google LLC*.

[1162] *United States and State of Colorado vs Google LLC* Cases 20-cv-3010 (APM) and 20-cv-3715 (APM). DoJ Proposed Final Judgment, 20 November 2024. [Plaintiffs' Initial Proposed Final Judgment: U.S. and Plaintiff States v. Google LLC [2020]]

[1163] Act on Promotion of Competition for Specified Smartphone Software (Act No. 58 of 2024).

[1164] Google's designation specifically relates to its basic operation software, app store, browser and search engine: Designation of Specified Software Operators under the Act on Promotion of Competition for Specified Smartphone Software | Japan Fair Trade Commission.

[1165] Brazil to investigate Google for anti-competitive practices | Business | valorinternational, accessed by the CMA on 8 July 2025.

[1166] The DMA applies to core platform services 'provided or offered by gatekeepers to business users established in the [European] Union or end-users established or located in the [European Union]' (Article 1(2)).

EEA) from any response to the DMA requirements, resulting in differences in how Google carries out and offers its Mobile Platform in the UK and the EEA. This has indeed been the case in relation to several DMA obligations; for example, Google only allows app developers to offer an alternative billing system without the choice of Google Play's billing system for users in EEA countries;[1167]

(b) even if Google were to extend its responses to the DMA to the UK voluntarily, they could be withdrawn at any time, and it does not necessarily follow that these changes would mean that Google would not have market power in respect of its Mobile Platform in the UK on a forward-looking basis;

(c) the European Commission has made preliminary findings that Alphabet Inc. has failed to comply with the DMA in certain respects, in particular regarding DMA Article 5(4) pursuant to which app developers distributing their apps via Google's Play Store should be able to inform customers, free of charge, of alternative offers outside the Play Store, steer them to those offers and allow them to make purchases.[1168] The European Commission has not yet reached a final decision on Google's compliance, and any decision could be subject to an appeal. Accordingly, the steps that Google will need to take to comply and any potential impact in the UK remains to be seen.[1169]

8.53 In relation to the US antitrust cases:

(a) Google has sought to stay the Epic Games case court order that it must open its Play Store and proprietary billing system to competitors, pending an appeal to the Supreme Court, and also sought an "en banc" rehearing of the decision.[1170] The outcome of these steps remains to be seen. Even if the remedies are ultimately enforced, there is no guarantee that they would extend to the UK.

(b) the cases relating to search concern activities that are distinct from Google's provision of its Mobile Platform, and moreover the remedies

[1167] Google's DMA Compliance Report, Non-confidential summary, 7 March 2025, NCV of Compliance Report 2025, p153.
[1168] European Commission's Press Release, Commission sends preliminary findings to Alphabet under the Digital Markets Act, 19 March 2025. Press corner | European Commission.
[1169] Some proposed changes may only apply to the EU, eg Google tweaks Google Play conditions following EU pressure | Reuters accessed 16 September 2025.
[1170] Epic Games response to Proposed Decision, page 8.

ruled by the court, including prohibiting exclusivity contracts and sharing certain data, are unlikely to affect Google's mobile platform significantly.[1171]

8.54 In relation to Japan's Mobile Software Competition Act, the effect of Google's obligations on the provision of its Mobile Platform in the UK is unclear. One possible outcome is that Google may carve out the UK market from any response to the requirements under Japanese legislation, resulting in differences in how Google carries out and offers its Mobile Platform in the UK and Japan.

8.55 In relation to the CADE investigation, proceedings are still at an early stage and no decision has yet been reached. Moreover, since any decision would only relate to Google's services in Brazil, there would be no guarantee that Google would extend its response to the UK.

Conclusion on market, technological and regulatory developments

8.56 On the basis of the available evidence, we find although regulatory and technological developments, including in relation to AI, connected devices, AR/VR products and emerging mobile device forms, may affect Google's conduct in carrying out its Mobile Platform services, for the reasons set out above they are not likely (whether individually, in aggregate or in combination with other developments we have considered) to be sufficient in scope, timeliness and impact to eliminate Google's substantial market power in relation to its Mobile Platform over the next five years.

Position of Strategic Significance

This section sets out our conclusion on whether Google has a position of strategic significance in relation to its Mobile Platform.

We conclude that Google has a position of strategic significance in respect of its Mobile Platform because at least the first two conditions[1172] (significant size or scale in respect of the digital activity and a significant number of other undertakings using the digital activity, either of which would suffice) are satisfied.

[1171] UNITED STATES OF AMERICA v. GOOGLE LLC, 1:20-cv-03010, (D.D.C. Sep 02, 2025) ECF No. 1436.
[1172] Pursuant to sections 6(a) and (b) of the Act.

8.57 Our conclusions are based on the evidence described below which shows that:

(a) Google's Mobile Platform is used by a very large number of UK users (eg to access, view and engage with digital content and services on their Mobile Devices) and businesses in the UK (eg as a means of reaching those users): see below.

(b) The services provided by Google as part of its Mobile Platform are important to a wide range and large number of other businesses in the UK to provide digital content and services to users of Android devices: see below.

8.58 While we have received evidence indicating that the third and fourth factors may also be satisfied,[1173] given the above finding, and since only one factor is sufficient, we have not considered the third and fourth factors in detail.

Significant size or scale

8.59 Our Guidance notes that there is no quantitative threshold for when size or scale can be considered 'significant'. This condition can be assessed using a range of absolute or relative metrics, which could include the number of users, usage data (eg time spent or frequency of use), the amount of data being gathered or accessed via the digital activity, the number of purchases or transactions made, or the revenue generated from the digital activity.[1174]

8.60 The evidence we have obtained indicates that Google's Mobile Platform has a significant number of users, a high share of supply and earns very large revenues. This is the case for Google's Mobile Platform and across the component parts of its Mobile Platform: namely its Mobile Operating System, Native App Distribution and Mobile Browser and Browser Engine, as set out below.

Mobile Operating System

8.61 Google's Android has a significant number of users, has consistently held a large share of supply and has generated significant revenue. In particular:

[1173] Ie that Google's position in respect of its Mobile Platform (a) would allow it to extend its market power to a range of other activities, and (b) allows it to determine or substantially influence the ways in which other undertakings conduct themselves, in respect of the digital activity or otherwise (sections 6(c) and 6(d) of the Act).
[1174] CMA194, paragraphs 2.68-2.70. See also explanatory notes to the Act, paragraph 114.

(a) In 2024, there were [✂] [30 – 40] million active Android smartphone Mobile Devices and [✂] [5 – 10] million Android tablet devices in the UK.[1175] This is a very significant number of users in the UK particularly when compared against the UK population of 69 million;[1176]

(b) Google has consistently been one of the largest suppliers of operating systems for both smartphones and tablets in the UK for almost a decade. In each year from 2015 to 2024, [✂] [40 – 50]% of active smartphones were Android devices, with Apple's iOS accounting for almost all the remaining share of supply in the UK over that period.[1177] In each year from 2017 to 2024, [✂] [20 – 30]% of active tablets were Android tablets;[1178]

(c) Google generates significant revenue from the sales of its own Android devices. In 2024 in the EMEA region, Google generated $[✂] [0 – 5] billion from sales of its own Android smartphones and $[✂] [0 – 20] million from sales of its own Android tablets.[1179]

Native App Distribution

8.62 Google's Play Store has a very high share of supply within its Mobile Ecosystem, a high number of users and transactions and generates significant revenue:

(a) Google's agreements with OEMs cover the majority of Android Mobile Devices distributed in the UK. Under the terms of Google's EMADA agreements, OEMs that choose to distribute GMS apps must have the Google Play Store pre-installed and placed prominently on the home

[1175] Google's response to section 69 notice [✂].
[1176] According to estimates reported by Worldometer, in 2024, the UK population was around 69 million.
[1177] The CMA has measured shares of supply on the basis of active devices. CMA analysis of data from market participants. In particular: Apple's response to section 69 notice [✂]; Google's response to section 69 notice [✂]; and Huawei's response to section 69 notice [✂]. More detail on share of supply is set out in Appendix A.
[1178] The CMA has measured shares of supply on the basis of active devices. CMA analysis of data from market participants. In particular: Apple's response to section 69 notice [✂]; Google's response to section 69 notice [✂]; Amazon's response to section 69 notice [✂]; and Huawei's response to section 69 notice [✂]. More detail on share of supply is set out in Appendix A.
[1179] Google's response of 3 March 2025 to section 69 notice [✂].

screen at mobile device set-up. The same terms apply to OEMs licensing Play for tablet devices;[1180]

(b) In 2024 Google's Play Store had [✂] [90 – 100]% share of supply for first-time native app downloads within Google's Mobile Ecosystem in the UK;[1181]

(c) The Play Store has a significant number of first-time downloads and active users in the UK. In the UK in 2024, the Play Store had [✂] [1.5 – 2] billion first-time downloads of native apps[1182] on smartphones and tablets and an average of [✂] [2 – 3] million daily active users;[1183,1184]

(d) The Play Store hosts a significant number of app developers, who conduct their business by providing a wide range of apps to users. For example, the monthly average number of app developers on the Play Store in 2024 in the UK was [✂] [0 – 1] million.[1185]

(e) Google generates very significant revenue through sales on its Play Store. In 2024, the value of customer billings and net revenues on the UK Play store were £[✂] [0 – 5] billion and £[✂] [0 – 2 billion] respectively.[1186,1187]

Mobile Browser and Browser Engine

8.63 Google has significant shares of supply in respect of both its Chrome browser and Blink browser engine. In particular:

[1180] Under the EMADA, OEMs must ensure that any Android devices they choose to distribute with GMS aps meet the baseline compatibility requirements as set out in the Compatibility Definition Document. See Appendix C for further detail on Google's agreements with OEMs.
[1181] The CMA has measured shares of supply on the basis of first-time native app downloads on Android devices. Analysis of data from market participants based on Google's response to section 69 notice [✂]; Samsung's response to section 69 notice [✂]; Xiaomi's response to section 69 notice [✂]; Oppo's response to section 69 notice [✂]; and Aptoide's response to section 69 notice [✂]. See Appendix A for further information.
[1182] Google's response to section 69 notice [✂].
[1183] Daily active users means the number of users that downloaded a native app from the Play Store each day.
[1184] Google's response to section 69 notice [✂]. See Appendix A for further information.
[1185] Google's response to section 69 notice [✂].
[1186] Customer billings means the value of user spend in third-party apps on Mobile Devices processed by Google Play's billing system and net revenue means the value of customer billings retained by Google via its billing system.
[1187] Google's response to section 69 notice [✂]; Google's response to section 69 notice [✂]. See Appendix A for further information.

(a) In June 2025, Chrome had a 80% share of supply of browsers within Google's Mobile Ecosystem in the UK, and in 2024 Chrome had a share of supply of 46% across all Mobile Devices in the UK;[1188]

(b) Chrome has a high number of active monthly users with [✂] [40 - 50 million] active monthly UK users on Android in December 2024;[1189]

(c) In June 2025, Blink had a share of supply of at least 99% for browser engines used within Google's Mobile Ecosystem in the UK;[1190]

(d) Mobile Browsers are a key gateway for UK mobile device users to access and search the internet. In March 2023, UK mobile device users used Mobile Browsers for around 15 hours per month. This represents around 16% of the time spent on all mobile apps.[1191]

8.64 The large number of users on Google's Mobile Platform, as described above, means that Google's actions can have a significant impact on a substantial number of people and businesses in the UK. This is especially so given the importance of Mobile Devices for most people's daily lives to access a range of content and services.[1192]

8.65 We therefore conclude that Google has significant size and scale in respect of the provision of its Mobile Platform.

A significant number of other firms use Google's Mobile Platform in carrying on their business

8.66 Our Guidance explains that this condition can be assessed, for example, by reference to the number of businesses, products and services 'hosted' on the firm's platform, and/or the proportion of other firms' sales it facilitates. As with the assessment of size and scale, there is no quantitative threshold for when the number of other firms using the digital activity to carry out their business can

[1188] CMA analysis of publicly available Cloudflare data. For more detail on Android browser shares see Appendix A – the CMA's analysis of publicly available Statcounter data.
[1189] Google's response to section 69 notice [✂]. Monthly active users is measured by Google as a snapshot of unique active users over the past 28 days on the first day of each month.
[1190] CMA analysis of publicly available Cloudflare data. For more detail on Android browser shares see Appendix A – the CMA's analysis of publicly available Statcounter data.
[1191] UK users spent 79.3 hours using mobile apps (excluding Mobile Browsers), and 14.7 hours using Mobile Browsers. 'Monthly hours per visitor spent using mobile browsers and apps in the United Kingdom (UK) in March 2023', Statistica, accessed 7 July 2025.
[1192] For example, Ofcom's 2022 Online Nation report found that consumers use smartphones for an average of three hours daily, and tablets for just over 30 minutes. Online Nation 2022 Report, Figures 1.4 and 1.6.

be considered significant and this may be assessed in terms of the firm's absolute position and/or relative to other firms.[1193]

8.67 Google's Mobile Platform is a key gateway through which a significant number of firms across a wide variety of sectors carry out their business by providing content and services to mobile device users in the UK.

8.68 In particular, the Play Store is an important access point or gateway to users for a diverse and large range of firms. The evidence we have gathered indicates that the Play Store is used by a significant number of firms to carry out their business. Specifically:

(a) In 2024 the Play Store had a [✂] [90 – 100]% share of supply for native app downloads on Google's Mobile Ecosystem in the UK;[1194]

(b) The Play Store hosts a significant number of app developers, who conduct their business by providing a wide range of apps to users. For example, the monthly average number of app developers on the Play Store in 2024 in the UK was [✂] [0 – 1] million and the monthly average number of native apps listed was [✂] [2 – 3] million.[1195] In the UK in 2024, the Play Store had [✂] [1.5 – 2] billion first-time downloads of native apps[1196] and an average of [✂] [2 – 3] million daily active users;[1197]

(c) App developers generate substantial revenues via the Play Store. For example, in 2024 in the UK, the value of customer billings on the Play Store was £[✂] [0 – 5] billion.[1198]

8.69 Similarly, Chrome is an important access point or gateway to users for a diverse and large range of businesses. This is because:

(a) Mobile browsers provide the primary gateway for users to access the web on their Mobile Devices, and hence for businesses to reach users with

[1193] CMA194, paragraphs 2.71-2.72. See also explanatory notes to the Act, paragraph 115.
[1194] The CMA has measured shares of supply on the basis of first-time native app downloads on Android devices. Analysis of data from market participants based on Google's response to section 69 notice [✂]; Samsung's response to section 69 notice [✂]; Xiaomi's response to section 69 notice [✂]; Oppo's response to section 69 notice [✂]; and Aptoide's response to section 69 notice [✂]. See Appendix A.
[1195] Google's response to section 69 notice [✂].
[1196] Google's response to section 69 notice [✂].
[1197] Google's response to section 69 notice [✂]. See Appendix A for further information.
[1198] Google's response to section 69 notice [✂]. Google's response to section 69 notice [✂]. See Appendix A.

their content and products. This includes both online content providers and search engine providers; and

(b) As noted above, Chrome had a leading share of supply on Android devices and a significant share of supply across all Mobile Devices.

8.70 The way Google carries out its Mobile Platform activity can have a significant impact on a range of firms, since it can influence the conditions under which they conduct their business on its platform. Google currently exerts control over its Mobile Platform through contractual agreements that it has in place with Android OEMs via which it can:

(a) Influence OEMs that have entered into such agreements as to the pre-installation, placement and default settings for its own apps and services on OEM Android Mobile Devices. This includes the Play Store, Chrome, Search and many other Google apps and services such as Google Maps, YouTube, Gmail and Gemini; and

(b) determine the extent to which OEMs can differentiate their version of Android by requiring those wanting to license Google first party apps and services to first enter into Google's Android Compatibility Commitment (**ACC**) under which they agree to maintain compatibility with a baseline version of Android.

8.71 Further, Google can set the terms of access to the Play Store (which is the primary vehicle for app distribution on Android Mobile Devices) as well as determine how native apps downloaded outside the Play Store can be updated and how the sideloading process works, including the steps needed and the language used.

8.72 We consider that the services provided by Google as part of its Mobile Platform are an important means for businesses from a wide range of sectors to reach consumers. The impact that Google's terms can have on these businesses has the ability to reduce business certainty and affect their incentives to invest.

8.73 We therefore conclude that a significant number of other firms use and rely on Google's Mobile Platform in carrying out their business.

Conclusion on whether Google meets the SMS conditions

Substantial and entrenched market power

8.74 In assessing whether Google has substantial and entrenched market power with respect to its Mobile Platform, we considered whether it faces strong competitive constraints and whether its market power is likely to persist over a forward-looking period of at least five years.

8.75 Our assessment considered the competitive constraint faced by Google's Mobile Platform from the perspectives of: (i) its distribution through the licensing arrangements with OEMs; and (ii) its usage by different user groups on both sides of the platform – end-users and content providers - with those users being themselves closely interlinked, again reflecting the nature of the platform. We also considered competitive constraints on Google's mobile browser, browser engine and app distribution. While we considered each component digital activity and its potential impact on different customer groups individually, our overall findings consider the extent of competitive constraint faced by Google's Mobile Platform as a whole.

8.76 First, in Chapter 6, we considered the current competitive constraints on Google's Mobile Platform from rival mobile ecosystems:

(a) In relation to competition for OEMs we conclude there is no effective constraint on Google from the risk that OEMs will switch their device manufacturing to support another mobile platform, as Android is the only established licensable mobile operating system, and new entry is not expected within the next five years.

(b) In considering competition for end-users, taking all the evidence in the round, we conclude that Google's Mobile Platform faces overall limited competitive constraint when competing for end-users:

(i) Analysis of shares of supply shows that Google's and Apple's Mobile Ecosystems have held persistently material, very stable and relatively equal shares of supply in the UK in each of the last ten years, with Google having a share of supply of 30-40% and Apple with 50-60%. The next largest Mobile Ecosystem in Amazon's Fire accounted for a share of supply of 5-10%. The shares of supply analysis shows that Google's market position has persisted over the

past seven years, which supports the view that its position is entrenched.

(ii) Pricing data demonstrates that the market is segmented, with the majority of Android devices sold being in the lowest value segment where Apple does not compete. Conversely, Apple has a higher share of supply in relation to premium devices where sales of Android devices are much lower. For example, smartphones with Apple's Mobile Platform accounted for 82% of new smartphones sold over £600, and smartphones with Google's Mobile Platform accounted for 61% of new smartphones sold between £300-£600 and 100% of new smartphones sold under £300.

(iii) Apple differentiates its Mobile Ecosystem from Google's, with a focus on integrated hardware and software, user-focused intuitive design, interoperability with other Apple devices, security, privacy and positioning itself as a premium brand. In contrast Google is focused on ensuring Android is available to a wide range of users at a variety of price points to enable wide distribution of its own services and revenue from digital advertising. This differentiation means end-users do not generally perceive Apple's Mobile Ecosystem and Google's Mobile Ecosystem to be close substitutes.

(iv) The strength of competitive constraint for end-users varies in different price segments. Apple provides a greater competitive constraint in relation to premium users with smartphones priced over £600 relative to non-premium users but premium users represent less than a quarter (23%) of Google's UK mobile end-users. However even in relation to premium users the competitive constraint is relatively limited and this is insufficient to act as an effective constraint across all Google's end-users, including those with cheaper devices, for whom Apple's Mobile Platform is less likely to be a viable alternative.

(v) There is limited user switching between Apple's and Google's Mobile Ecosystems and this remains the case across all price segments. Those considering switching are likely to be among the most contested by Apple and Google but this group is a minority. Most users do not consider switching at all and there are both actual and

perceived barriers to switching, for example concerns about loss of data like photos when moving between platforms.

(vi) We cannot robustly infer whether improvements in quality and innovation, alongside relatively high rates of customer satisfaction, are driven by competitive pressure or other factors. Improvements in quality are equally consistent with Google's incentives to increase revenues from its existing user base.

(c) We then assessed the extent of constraint which Google faces to attract content providers to develop content for its Mobile Platform:

(i) In relation to app developers we conclude that Google's Mobile Platform faces very limited competition when competing for content providers. In particular, both Google's Play Store and Apple's App Store are 'must-have' distribution channels for content providers as each store is the only way to access a large and distinct set of users (40-50% of mobile users in the UK use Google's Mobile Platform). Again, we could not robustly infer whether evidence on changes in outcomes including price, quality and revenue shares is as a result of competitive pressure or other factors.

(ii) In relation to web content, Apple and Google do not compete for web content to be made available on their Mobile Platforms. Rather content providers write content once for distribution across different platforms. Content providers do not therefore choose whether to distribute on one platform or another, as by its very nature web content is broadly available.

(d) We assessed revenue sharing agreements between Apple and Google and find that these further limit their incentive to compete with each other, as the arrangement is of high strategic and financial importance to both.

(e) Beyond Apple, Google's Mobile Platform faces very limited competitive constraint from other mobile ecosystems. There are significant barriers to entry and expansion, which limit the threat of new entry which might otherwise act as a competitive constraint on Google's Mobile Platform. The indirect network effects related to attracting native app developers to a new operating system form a particularly strong barrier.

(f) The evidence we have seen does not indicate that Google's position across its Mobile Platform as a whole is likely to change significantly over the next five years.

8.77 Bringing all these dimensions together to consider the strength of competitive constraint across Google's Mobile Platform as a whole, **we conclude that Google's Mobile Platform faces limited competitive constraint from rival mobile ecosystems**.

8.78 In Chapter 7 we considered the competitive constraints on Google's mobile content provision and distribution within Google Mobile Ecosystem, and from non-Mobile Devices. This focused on the alternatives to Google's Native App Distribution and alternatives to Google's Mobile Browser and Browser Engine:

(a) In native app distribution, Google faces potential competition from a range of alternatives such as alternative app stores, sideloading, OEMs pre-installing third-party native apps, cloud-based gaming, super apps, and web-based content distribution. However, overall, we find that these alternatives impose only a limited competitive constraint on the Play Store, supported by evidence showing app developers do not view these methods as a substitute (rather, in some cases they are viewed as complements) to distributing native apps on the Play Store. There is also limited usage of these methods. Non-mobile content distribution alternatives are generally considered by app developers to be complements rather than substitutes. The ability of users to make purchases on non-mobile platforms provides limited competitive constraint on the Play Store. However, the evidence indicates that this represents only a partial constraint for a sub-set of app developers and for certain users. We have not seen evidence of expected or foreseeable developments suggesting that these competitive constraints are likely to disrupt the Play Store's position over the next five years.

(b) Google's Chrome mobile browser also faces limited competitive constraints within Google's Mobile Ecosystem. Although other mobile browsers are available, these are limited by several barriers to entry and expansion, and Chrome's consistently high share of supply indicates that these are a weak constraint. Although AI is likely to impact mobile browsers, the precise implications are unclear, and it is not expected to affect significantly the position of Chrome. Google faces even less competition to its browser engine Blink, and its provision of in-app

browsing. Alternatives to mobile browsers, namely native apps and AI tools, only provide a limited competitive constraint for a limited set of use cases, and desktop browsing is generally considered a complement rather than a substitute. We have not seen sufficient evidence of expected or foreseeable developments suggesting that these competitive constraints are likely to disrupt the Chrome or Blink's position over the next five years.

8.79 Overall, we therefore consider that Google faces limited competitive constraints from content provision and distribution alternatives within its Mobile Ecosystem and from non-mobile alternatives.

8.80 We have also considered Google's profitability with respect to its Mobile Platform. We found that Google generates profits from its Mobile Platform primarily from mobile search advertising, the Play Store (including Play Advertising) and other mobile advertising, and is earning significant profits from its Mobile Platform activities, including in the UK. Our analysis indicates that Google was highly profitable for at least the last ten years, making high profits and a high return on capital. We have reviewed the available evidence, including Google's own financial projections relating to future revenues. We have not seen evidence indicating that Google's high levels of profitability will not continue. We estimate that its Mobile Platform activities have generated a high return on capital relative to our estimate of Google's WACC over this period. This is consistent with Google having substantial market power.

8.81 Overall, our assessment shows that Google faces limited current competitive constraints in the provision of its Mobile Platform. Google faces a very limited constraint with respect to content providers and no effective competition in licensing to OEMs. Consequently, any constraint in relation to end users would need to be particularly pronounced to ensure that Google does not have substantial market power. However, our assessment shows that Apple only exerts a limited competitive constraint in relation to end users. **We therefore conclude that Google has substantial market power in the provision of its Mobile Platform.**

8.82 In order to assess whether an undertaking has substantial and entrenched market power in respect of a digital activity, the CMA must carry out a forward-looking assessment over a period of at least five years – the length of the SMS designation.[1199] The forward-looking assessment is part of the CMA's

[1199] Section 5 of the Act.

assessment of substantial and entrenched market power, not a separate step. It will have particular relevance for the assessment of whether market power is entrenched.[1200]

8.83 In the preceding sections, we have considered developments that would be expected or foreseeable if the CMA did not designate Google as having SMS in respect of the provision of its Mobile Platform and which may affect Google's conduct in carrying out the provision of its Mobile Platform. We considered:

(a) market developments such as entry, expansion and emerging business models;

(b) technological developments such as AI, connected devices, edge computing, advances in network connectivity and cross-platform gaming; and

(c) regulatory and other developments including litigation.

8.84 We also considered the extent to which the competitive constraints on Google's Play Store and on Chrome were likely to change over the next five years.

8.85 The persistence of Google's market position and the scale of the barriers to entry and expansion described above are consistent with Google having entrenched market power in respect of the provision of its Mobile Platform. In this context, considerable changes in the competitive dynamics would be required to impact significantly Google's strong and established position and to eliminate Google's substantial market power in respect of its Mobile Platform in the next five years.

8.86 For the reasons set out in this decision, we conclude that there are no expected or foreseeable developments that are likely (whether individually or in combination) to be sufficient in scope, timeliness and impact to eliminate Google's substantial market power in the provision of its Mobile Platform over the next five years. Accordingly, our conclusion is that Google's substantial market power in the provision of its Mobile Platform is entrenched.[1201]

[1200] CMA194, paragraph 2.56.
[1201] CMA194, paragraph 2.62.

8.87 For these reasons and, on the basis of the above, our decision is that Google has substantial and entrenched market power in respect of the provision of its Mobile Platform.

Position of Strategic Significance

8.88 We then assessed whether Google has a position of strategic significance in relation to its Mobile Platform. We consider that at least the first two POSS conditions are satisfied:

(a) Google's Mobile Platform is used by a very large number of UK users (eg to access, view and engage with digital content and services on their Mobile Devices) and businesses in the UK (eg as a means of reaching those users).

(b) The services provided by Google as part of its Mobile Platform are important to a wide range and large number of other businesses in the UK to provide digital content and services to users of Android Mobile Devices.

8.89 For these reasons and, on the basis of the above, our decision is therefore that Google has a position of strategic significance in respect of its Mobile Platform.