

Appendix C: Context to and use of evidence in this investigation

- C.1 This appendix presents context to our investigation and sets out how we have used evidence in it. It includes:
- (a) an outline of previous CMA work in this area;
 - (b) some relevant international context to the investigation;
 - (c) an overview of our evidence gathering and the range of evidence we have used;
 - (d) our approach to the use of evidence; and
 - (e) our primary research amongst consumers.

Previous CMA work

- C.2 This investigation builds on significant prior CMA work connected to mobile ecosystems:
- (a) First, in June 2021, the CMA commenced its Mobile Ecosystems Market Study (**MEMS**). This study considered in detail the key products and services within Apple's and Google's mobile ecosystems. The final report was published in June 2022 and found that Apple and Google hold an effective duopoly in mobile ecosystems.
 - (b) Second, the CMA carried out investigations under the Competition Act 1998 into Apple's and Google's conduct regarding their policies related to how in-app payments work within native apps:
 - (i) An investigation commenced in March 2021 relating to Apple's conduct in relation to the distribution of apps on iOS and iPadOS devices in the UK, in particular the terms and conditions governing app developers' access to Apple's App Store.
 - (ii) An investigation commenced in June 2022 relating to Google's conduct in relation to the distribution of apps on Android devices in the UK, in particular Google Play's rules that oblige certain app developers to use Google Play's own billing system for in-app purchases.

- (iii) Both these investigations were closed in August 2024 on the grounds of administrative priorities – noting that, should both Apple and Google, or one of them, be designated as having SMS in connection with any digital activities in the mobile sector, the CMA would be able to use its new powers under the Act to consider the range of issues raised by parties more holistically than it otherwise could under the specific Competition Act 1998 investigations.
- (c) Third, the CMA made a market investigation reference on 22 November 2022 in relation to mobile browsers and cloud gaming (**MBCG MI**). The investigation concluded in March 2025, with the inquiry group finding ‘adverse effects on competition’ and making a recommendation to the CMA Board to consider the concerns raised and potential remedies as part of this SMS investigation.

International context

- C.3 Several competition authorities globally have investigated or taken action in relation to Apple’s Mobile Platform in recent years. Although our SMS investigation is focused on Apple’s activities in the UK, Apple’s Mobile Platform operates globally, and we have sought to learn from international findings in conducting our own investigation.
- (a) In the EU, under the DMA, the European Commission (the **Commission**) has designated Apple as a gatekeeper in respect of iOS, iPadOS, the App Store and Safari, to which the obligations of the DMA apply. Further, it has completed specification proceedings in respect of Apple’s compliance with the interoperability provisions of the DMA. The Commission has also launched non-compliance investigations, finding Apple non-compliant for its approach to steering and provisionally finding it non-compliant for its approach to alternative app distribution. The Commission also opened proceedings in relation to Apple’s compliance with DMA provisions regarding choice architecture, though it decided to close the proceedings following Apple’s implementation of updated measures.
 - (b) In the EU, under antitrust enforcement in March 2024, the Commission found that Apple had abused a dominant position in the market for the distribution of music streaming apps to iOS users through its App Store. In July 2024, the Commission also made preliminary findings that Apple had significant market power in the market for smart Mobile Devices and a dominant position in the in-store mobile wallet market on iOS and

accepted commitments addressing Apple's refusal to grant rivals access to a standard technology used for contactless payments with iPhones in stores (Near Field Communication (**NFC**)).

- (c) A number of other jurisdictions are taking action to impose ex ante rules that affect the supply of mobile ecosystems, including in Japan, where new legislation, the Mobile Software Competition Act, prohibits anti-steering arrangements and the prevention of alternative app stores, alternative in-app payment systems and alternative browser engines.
- (d) The US Department of Justice has started an action against Apple in the US, which alleges that Apple has monopolised smartphone markets through an exclusionary course of conduct and anti-competitive acts including contractual restrictions against app creation, distribution and access to application programming interfaces (**API**).
- (e) Apple's Mobile Platform is also the subject of a number of litigation proceedings in both the UK and other jurisdictions.

Evidence used in this investigation

C.4 During our investigation, we gathered a wide range of evidence from Apple as well as stakeholders across the digital economy and the wider public. We conducted this evidence gathering process through the following means:

- (a) ITC: At the outset of the investigation, we published the ITC alongside the Investigation Notice inviting views on the scope and main avenues of the investigation. We received 54 ITC responses from third parties and published non-confidential responses on the case page.
- (b) Engagement with Apple: The CMA extensively engaged with Apple formally and informally throughout the investigation. Apple had multiple opportunities to present facts, make submissions in support of its positions and comment on our emerging thinking in addition to formally responding to the Proposed Decision. These opportunities included:
 - (i) an invitation to respond to the ITC;
 - (ii) in-person meetings with CMA decision-makers;
 - (iii) engagement with the case team and CMA senior executives, including through meetings and 'teach-ins'; and

- (i) responses to formal and informal requests for information which we sent to Apple. Through these requests we obtained qualitative evidence, internal documents and quantitative data.
- (c) Evidence from other market participants, in particular:
 - (i) We obtained information (including both qualitative and quantitative information) and/or held bilateral meetings with over 150 market participants. This included large and small app developers, mobile browser vendors, manufacturers of smartphones and/or tablets, firms that make connected devices such as wearables or smart speakers, developers of AI foundation model-based services, providers of payment services and digital wallets, telecommunication operators and app store providers.
 - (ii) We also held an app developer workshop to explore the issues and hear market participants' views. There were 13 representatives from app developers and associations. A summary of the app developer workshop was published on our case page.
- (d) Consumer market research: we engaged an independent market research company (Accent Research) to conduct a quantitative survey to inform the investigation. We issued an Invitation to Comment on the Consumer Survey before instructing Accent Research. The findings of this research are published on the case page. We set out further details on this later in this Appendix.
- (e) Engagement with experts and other regulators: we met with several subject matter experts and members of our Growth and Investment Council. We also coordinated with Ofcom and the Financial Conduct Authority (**FCA**), taking account of our duties under section 107 of the Act, which require us to consult those bodies where we propose to exercise our regulatory digital markets functions in respect of which Ofcom and the FCA have concurrent functions. We also engaged on an informal basis with Ofcom, the FCA, the Payment Systems Regulator, the Bank of England and the Information Commissioner's Office.
- (f) Investor reports: We gathered a selection of investor reports that commented on Apple's expected financial performance using the Refinitiv platform. We searched for relevant information on the platform and gathered two selections of reports: one of reports published

between June and September 2025 and another of reports published between September 2024 and March 2025.

- (g) Obtaining financial projections from Apple: We requested financial projections from Apple in relation to future revenues and profitability. We set out further details on this in Appendix B.
- (h) Accessing publicly available information, where this is relevant and reliable.

C.5 In order to be proportionate and targeted, where we were aware of submissions and evidence obtained in other CMA investigations which we considered to be relevant to this investigation, we have used that information for the purposes of this investigation, giving notice to the relevant party which provided the information to the CMA. Throughout this decision the provenance of all the information we are relying on is set out clearly in footnotes.

Our approach to the use of evidence

Our general approach and the Guidance

- C.6 This section sets out our general approach to the use of evidence as informed by the Guidance. In the following sections, we explain in more detail how we approach the use of third-party evidence and internal documents in this investigation.
- C.7 The CMA does not have a prescriptive list of evidence that it will take into account in its SMS assessment and it may rely on a range of quantitative and/or qualitative evidence, with the balance between the two varying across investigations. The evidence used will depend on the specifics of the case.¹
- C.8 In line with the Guidance, we have decided the weight it is appropriate to place on a particular piece of evidence, taking into account, for example, its relative quality. There is no set hierarchy between quantitative evidence, such as consumer surveys or econometric analysis, and qualitative evidence, such as internal documents or statements of relevant firms. Further, there are no quantitative thresholds for when the two SMS conditions are met. The CMA may use different methods and approaches

¹ CMA194, paragraph 2.76.

depending on the specific circumstances and the form, depth or complexity of the analysis may vary across investigations, even in the same industry.²

- C.9 We may rely on relevant evidence gathered and analysis carried out in other cases, including, for example, market studies involving potential SMS firms, or other cases under the CMA's digital markets functions or its other tools, where relevant. We have done so in this investigation. In doing so, we have been mindful of when and for what purpose the evidence was initially gathered and considered the weight it should be given and the extent to which it should be updated or corroborated, in particular given market developments since the evidence was gathered.³
- C.10 We have assessed the totality of the evidence together and in the round, including giving due regard to the extent that our view on the interpretation of a piece of evidence is corroborated by other evidence available to us.
- C.11 We have assessed whether Apple has substantial and entrenched market power and a position of strategic significance in relation to the relevant digital activity on the balance of probabilities, and based on an in-the-round assessment of the evidence available to us.⁴

Our approach to assessing third-party evidence

- C.12 During the course of the investigation, Apple made submissions regarding our approach to evidence gathering and assessment and on certain procedural issues.
- C.13 The CMA's procedures in SMS investigations are designed to enable it to fulfil its duty to promote competition for the benefit of consumers in an efficient manner, while ensuring that the due process rights of parties which are likely to be affected by CMA decisions are fully respected. While the CMA ensures that parties' rights of due process are fully respected, it may not be able to accommodate all requests made by parties (eg for access to underlying evidence) during the course of an investigation, particularly where this would not be consistent with the statutory framework within which the CMA operates, or would undermine the efficient conduct of the CMA's investigation.
- C.14 In its response to the Proposed Decision, Apple submitted that:

² CMA194, paragraph 2.77.

³ CMA194, paragraph 2.78.

⁴ CMA194 paragraph 2.80.

- (a) we have not adequately tested all third-party evidence and that our provisional findings were heavily influenced by ‘views expressed by a minority of third parties with no evidence of widespread harm or dissatisfaction’;⁵
- (b) the Proposed Decision failed to take account of the commercial incentives of third parties when considering the views submitted;⁶
- (c) the Proposed Decision relied upon irrelevant evidence. Specifically, Apple submitted that the CMA consistently cited evidence submitted by parties who do not appear to be well placed (given their expertise and experience) to comment meaningfully on the matters at issue;⁷ and
- (d) the Proposed Decision’s assessment of the potential impact of AI on competition between Mobile Devices represents ‘an irrational weighing of the evidence’ and that the CMA is ‘at the very least, under an obligation to make sufficient inquiries into these advances to inform its assessment of future market developments’.⁸

C.15 As explained above, we have gathered evidence from a wide range of different sources to inform our investigation, including submissions by Apple and many other stakeholders; internal documents; our consumer survey; engagement with subject matter experts and other regulators; and share of supply estimates. Accordingly, submissions from market participants other than Apple are only one category of evidence we have considered and, in doing so, we have consulted with, and considered evidence from, a wide range of different types of stakeholders in order to assess the issues that have been the subject of this investigation.

C.16 As is the case in any investigation, we recognise that market participants may have an interest in its outcome. When using the views of market participants as evidence, we have given due regard to a range of factors including the incentives of the party giving that view, the extent to which the party had knowledge or expertise that was relevant to the subject areas being explored as part of our assessment, the extent to which the party provided evidence to support its view, and the extent to which the view was, or was not, aligned with other evidence available to us.

C.17 In relation to gathering evidence from app developers specifically, we recognised that app developers are a large and diverse stakeholder group.

⁵ [Apple's response to Proposed Decision](#), paragraph 18.

⁶ Submission from Apple, [REDACTED].

⁷ Submission from Apple, [REDACTED].

⁸ [Apple's response to Proposed Decision](#), paragraph 105.

To ensure that our evidence base was balanced, and not unduly influenced by the views of individual app developers, we adopted an objective approach to identifying a balanced sample of developers to contact. First, we requested data from Apple and Google on apps listed on their respective app stores. Based on this data, we identified a sample of developers that spans different sizes (based on number of downloads and revenue received from in-app payments) and categories.

- C.18 The approach described above also informed our forward-looking assessment. Specifically, we asked Apple as well as a significant number of stakeholders with whom we engaged (including via the ITC, information requests, bilateral meetings and engagement with subject matter experts) whether they considered there are any expected or foreseeable market or technological developments that will impact Mobile Ecosystems and/or Apple's position in Mobile Ecosystems over the next five years. We then carefully considered this broad base of evidence in arriving at our conclusions.
- C.19 Lastly, the fact that we have not specifically referred to each piece of the evidence provided does not mean that we have not considered it; our positions and decisions have taken account of all the relevant evidence. In doing so, we have assessed all submissions made to us and taken steps to ensure that Apple and other stakeholders have had appropriate opportunities to present their positions and provide relevant evidence to us. We have also ensured that Apple as the investigated firm had the opportunity to respond to third-party submissions in response to the Proposed Decision (whilst ensuring the confidentiality of commercially sensitive information).

Our approach to assessing internal document evidence

- C.20 In response to the Proposed Decision, Apple submitted that the CMA mischaracterised Apple's internal documents in a number of respects.⁹ We have carefully assessed the evidence including the internal documents in light of Apple's submissions in arriving at our conclusions.
- C.21 We gathered internal documents from Apple and Google through information requests issued under section 69 of the Act. Overall, we gathered 158 internal documents from Apple, and 304 from Google produced at the board of directors or senior management level covering: (i) competitive trends; (ii)

⁹ Specifically, Apple submitted that the CMA mischaracterised Apple's internal documents in relation to (a) the potential impact of future market developments on Mobile Platform competition, (b) outcomes for users and developers, and (c) the intensity of competition faced by Safari. [Apple's response to Proposed Decision](#), paragraphs 104, 112, and 114.

potential technological disruptions; (iii) extent of competition with competitors and competitive monitoring; and (iv) switching behaviour. We also reviewed internal documents submitted to the CMA in the context of recent investigations, in particular the MBCG MI.

C.22 This internal document evidence informed our assessment in several areas including our assessment of constraints on Apple's Mobile Platform, in particular: (i) our assessment of competitive constraints on Apple's Mobile Platform from rival Mobile Ecosystems (Chapter 6); (ii) our assessment of competition from alternatives to Apple's content provision and distribution (Chapter 7); and (iii) our assessment of technological and market developments on a forward-looking basis (Chapter 8).

C.23 We set out below our approach to internal documents in this investigation:

- (a) In considering the weight to be placed on internal document evidence, we took into account a number of factors, including the content of the documents, the context in which the documents were produced, and the date on which the documents were created. We have not based our assessment on quantitative counts of the number of documents (eg mentioning a certain competitor or topic) and instead, assessed the internal document evidence's strength in the round, exercising our expert, regulatory judgement.
- (b) We have also considered the internal document evidence in the context of Apple and Google being the only two significant providers of Mobile Platforms. We have taken this context into account in assessing the extent to which references to Google in Apple's internal documents, eg comparing performance or monitoring features, are indicative of the strength of the competitive constraint imposed by Google.
- (c) We have assessed all the internal documents on a neutral basis to ensure that we took into account material evidence relevant to the assessment of the SMS conditions, regardless of whether the documents are supportive or unsupportive of a conclusion that such conditions are satisfied.
- (d) In our assessment of the internal documents, we have placed more weight on documents that were created before the regulatory process

began, and where the evidence contained in such documents is corroborated by other evidence.¹⁰

Primary research with consumers

C.24 We engaged an independent market research company (Accent Research) to conduct a quantitative survey to inform the investigation. This focused on understanding:

- (a) consumer purchasing behaviour in the UK smartphone market;
- (b) switching between smartphone brands and operating systems;
- (c) consumer behaviour in using apps; and
- (d) consumer behaviour in conducting online search activities.

C.25 The findings of this research, the Accent Mobile Consumer Survey, were published on the case page alongside the Proposed Decision.¹¹

C.26 In response to the Proposed Decision, Apple provided submissions in relation to survey evidence. These related to:

- (a) the interpretation of the available survey evidence base, based primarily on Apple's own analysis of the Accent Mobile Consumer Survey data, and the results of other consumer surveys commissioned by Apple;¹² and
- (b) methodological aspects of the Accent Mobile Consumer Survey, including the importance of security and privacy for device choice;¹³ and the response rate achieved in the survey.¹⁴

C.27 Our consideration of Apple's submissions is set out under the following headings:

- (a) The interpretation of survey evidence:

¹⁰ Typically, we place more evidentiary weight on internal documents prepared in the ordinary course of business and which pre-date when regulatory process was in contemplation (see for example our approach in the mergers context as set out in CMA129, paragraph 2.29(a)). We note that MEMS was launched in June 2021 concluding in June 2022 and MBCG MI was launched in November 2022 concluding in March 2025. This timeline means that it is unlikely there are any documents that are both recent and pre-date potential intervention in mobile ecosystems in the UK.

¹¹ [Accent Mobile Consumer Survey](#).

¹² Submission from Apple [§].

¹³ Submission from Apple [§].

¹⁴ [Apple's response to Proposed Decision](#), paragraph 18.

- (i) User experience of switching.
 - (ii) Switching barriers and preferences.
 - (iii) Consumer awareness and preferences.
- (b) Methodological aspects of the Accent Mobile Consumer Survey:
- (i) The importance of security and privacy for users.
 - (ii) Accent Mobile Consumer Survey response rate.

The interpretation of survey evidence

C.28 We have presented our view on the survey evidence within our assessment in this decision. Within this section of Appendix C, we consider the submissions made by Apple in relation to our interpretation of the survey findings.

C.29 The points we make in this section relate only to the survey evidence. As outlined above, we note that the survey is only one of the evidence sources we have used as part of our assessment, and our findings are based on considering all the evidence in the round.

User experience of switching

C.30 Apple submitted a range of consumer research measuring smartphone users' experience of switching operating systems, including from the Accent Mobile Consumer Survey, the MEMS Consumer Survey and the [REDACTED].¹⁵ Drawing on this evidence, Apple submitted, 'actual barriers to switching between mobile platforms are low. Across all the available survey evidence, only a few users report difficulties even when asked about a wide range of switching tasks'.¹⁶ We have reviewed the range of sources submitted by Apple. These show somewhat different levels of difficulties with switching based on different types of questions but are in line with the Accent Mobile Consumer Survey findings in showing that, whilst the majority of users do not report difficulty switching, a material proportion of users do.¹⁷

¹⁵ [CMA consumer research into purchasing behaviour in the UK smartphone market - GOV.UK](#)

¹⁶ Submission from Apple [REDACTED].

¹⁷ For example, Apple present data on satisfaction with switching: 'Respondents in the Accent MEMS survey were also asked how difficult they found the switching process overall and how satisfied users were with the switch. 81% of respondents found switching between iOS and Android (or vice versa) easy. As much as 83% of respondents reported being satisfied with the switching experience.' Submission from Apple [REDACTED]

C.31 The Accent Mobile Consumer Survey found that 75% of users who switched used some form of assistance.¹⁸ Noting the range of support utilised by switchers, Apple submitted, ‘The ability to seek assistance can help users overcome any difficulties they may encounter during the switching process’.¹⁹ We consider that, while it is true that assistance can facilitate switching, the high use of assistance suggests that switching is not straightforward. Furthermore, the switching barriers described in this decision were identified by consumers despite the availability of various forms of assistance.²⁰

Switching barriers and preferences

C.32 In its analytical report, Apple disagreed with our classification of barriers to switching set out in the Provisional Decision and submitted that users’ decisions not to switch were driven by preferences rather than barriers. Apple presented bespoke analysis of the Accent Mobile Consumer Survey to illustrate this.²¹

C.33 We have replicated Apple’s analysis and have identified some issues with the analytical approach. We maintain our view on the classification of barriers presented in the analysis of the Accent Mobile Consumer Survey. We set out Apple’s views on the measurement of switching barriers, Apple’s alternative analysis of switching barriers, and the issues that we identified, below.

Measuring switching barriers in the Accent Mobile Consumer Survey

C.34 Seven potential barriers were measured in the Accent Mobile Consumer Survey as follows:²²

- (a) I was concerned about losing data (e.g. photos, messages, videos) when transferring to #Altphone#.
- (b) I didn’t want to spend the time learning how to use #Altphone#.

¹⁸ [Accent Mobile Consumer Survey](#), page 63.

¹⁹ Submission from Apple [38].

²⁰ See Chapter 5.

²¹ Submission from Apple [38].

²² Survey respondents that had not switched operating systems for their current smartphone were asked ‘Which of the following reasons explain why you didn’t consider switching to/didn’t get an Android/Apple smartphone?’. Respondents were presented with 20 reasons and an ‘Other-write in’ option. Respondents were instructed to ‘please select all that apply’ and the order of options was randomised. #Altphone (ie alternative OS) was text-filled accordingly, depending on the users’ current operating system.

- (c) I wanted to continue using the same operating system as my friends/family.
- (d) I had other devices linked to my current phone/operating system.
- (e) I use apps not available on #Altphone#.
- (f) I was concerned about losing paid-for subscriptions/content in apps on my phone.
- (g) I felt it would be too much hassle to switch to an #Altphone#.

C.35 Apple submitted a range of views on the survey, including that:

- (a) the response options measuring barriers to switching were ‘imprecise and do not necessarily indicate switching barriers’;²³
- (b) survey respondents may have selected these reasons without them constituting a barrier to switching, ‘instead reflecting satisfaction with Apple devices or a strong preference for the Apple platform’;
- (c) ‘the CMA presented Accent’s selection of barriers to switching without any further scrutiny on whether they were, in fact, a barrier’. Apple conducted new analysis to test its theory. In this analysis, Apple reclassified barriers (a) and (f) above as ‘Possible Switching Barriers (that may, on their face, be interpreted as barriers to switching, even if they may not, in practice, ultimately deter switching)’; and reclassified the remaining five barriers as ‘Ambiguous Response Options’, which Apple considered less likely to represent a barrier to switching;²⁴ and
- (d) any reasons for not switching which are not considered to be ‘possible’ or ‘ambiguous’ barriers must be considered to indicate a preference for the users’ current ecosystem/device.²⁵

C.36 Apple then conducted a number of analyses (described below) which explored the relationship between users’ selection of barriers and users’ selection of other ‘preference’ reasons for not switching. Apple submitted that its analysis showed ‘that the survey design conflates preference-driven

²³ With particular regard to the linked devices barrier, Apple noted that its response to the ITC on the draft Accent Mobile Consumer Survey had proposed that this option should be reworded to ‘I was concerned that other devices linked to my current phone/operating system would not be compatible with [Android]’. We carefully considered parties’ comments when developing the questionnaire. While many suggestions were accepted, this particular suggestion was considered unsuitable due to the length of Apple’s suggested response option. Submission from Apple [REDACTED].

²⁴ Submission from Apple [REDACTED].

²⁵ The exception to this is the response option ‘I could not see any significant benefits from switching’ which Apple did not classify as representing either a barrier or preference. Submission from Apple [REDACTED].

responses with genuine perceived switching barriers, thereby overstating the presence of perceived barriers'.²⁶

- C.37 We discuss Apple's analysis and our assessment of it below, setting out why we do not agree with Apple's assessment of the validity of the switching barriers.
- C.38 Apple presented analysis which showed that approximately 90% of iOS non-switchers selected at least one 'preference' factor. Apple noted that this proportion was higher than the proportion of iOS users that had selected at least one barrier (72%).²⁷
- C.39 Developing this further, Apple presented analysis to show that the vast majority (over 90%) of iOS users that had selected the five 'ambiguous' barriers had also selected some preferences, almost 80% had selected two preferences and around six in ten had selected three or more preferences. For the 'Possible Switching Barriers' – ie concerns about losing paid-for subscriptions, content or data when transferring to an Android phone – Apple presented analysis which found the same pattern; upwards of 90% of users selecting those barriers had also selected preferences.²⁸ This is consistent with CMA analysis which finds that around one in ten iOS users selected only barriers.
- C.40 Apple presented further analysis looking at the top three most important reasons given by respondents for not switching. Apple submitted that users who did not select a Potential Switching Barrier amongst their top three most important reasons not to switch – or selected the barrier among their top three most important reasons but ranked a preference factor higher than the Potential Switching Barrier – could not have been considered to be influenced by these reasons not to switch. Apple submitted that 90% of iOS users were not influenced in their decision not to switch by concerns about losing data; and 98% were not influenced in their decision not to switch by concerns about losing paid-for subscriptions or content.²⁹
- C.41 We do not agree that reasons which are not selected by respondents as their most important reasons can be considered to have had no influence on user behaviour. The Accent Mobile Consumer Survey found that 24% of iOS

²⁶ Submission from Apple [redacted].

²⁷ CMA analysis finds the same pattern. Apple also submitted that the equivalent proportion of iOS marginal users selecting at least one 'preference' factor was 81%. Submission from Apple [redacted].

²⁸ Submission from Apple [redacted].

²⁹ Submission from Apple [redacted].

users were concerned about losing data when switching; and 5% were concerned about losing paid-for subscriptions of content.³⁰

Apple's analysis of 'preference' reasons for not switching

C.42 Apple presented analysis which explored iOS users' selection of barriers and preferences. The analysis focussed on five 'preference' reasons for iOS users not switching, showing that 'these respondents, in particular, report higher satisfaction with their current smartphone brand and stronger identification with iOS compared to other survey participants':³¹

- (a) I was happy with/preferred my existing smartphone brand (iOS);
- (b) I just wanted a newer version of my previous phone (iOS);
- (c) I identified more closely with iOS than Android;
- (d) I thought iOS had better security features; and
- (e) I thought iOS had better privacy features.

C.43 In addition, Apple included two response codes from a separate Accent Mobile Consumer Survey question measuring the reasons given by users for their choice of current smartphone, which they also designated as preference indicators:

- (a) Brand; and
- (b) Operating system.³²

C.44 Apple explored the extent to which these specific 'preference' reasons had been selected by iOS users that had also selected the two 'Possible Switching Barriers' related to loss of subscriptions, content or data.

C.45 It presented analysis which showed that users that had selected these barriers were more likely than their counterparts that had not selected these barriers to have selected preferences. Apple submitted that, 'These respondents, in particular, report higher satisfaction with their current smartphone brand and a stronger identification with iOS compared to other

³⁰ [Accent Mobile Consumer Survey](#), page 46, Figure 35.

³¹ Submission from Apple [3].

³² Q6b of the Accent Mobile Consumer Survey asked respondents '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? Please read down the list before selecting the factors that were most important to you when you first got your phone'. Respondents were presented with 19 reasons and an 'Other-write in' option. Respondents were instructed to 'please select all that apply' and the order of options was randomised. Submission from Apple [3].

survey participants. Notably, those expressing concern about losing subscriptions also demonstrate a pronounced preference for security and privacy, which aligns with their decision to choose an iOS device.³³

- C.46 Apple presented similar analysis exploring the relationship between survey respondents' selection of 'preference' reasons for not switching and the remaining five barriers designated 'ambiguous'. Apple presented analysis for each of the barriers in turn, looking at the percentage of respondents who selected each of the seven preference indicators (above), split by those who selected the respective barrier and those who did not.³⁴ Apple submitted that the analysis demonstrated 'Ambiguous Response Options' were primarily selected by respondents that were more likely to have selected 'preference' reasons for not switching.
- C.47 Apple concluded from the analysis that barriers are primarily selected by iOS users with strong platform preferences; and, 'respondents may have reported Ambiguous Response Options because of a preference for their current platform, not because of any perceived switching barriers.'³⁵
- (a) We do not share Apple's conclusion with regard to what it describes as Ambiguous Response Options or Possible Switching Barriers. Apple's analysis fails to account for the lack of independence between factors selected, and the total number of selections made by each respondent. Consequently, Apple identified spurious relationships resulting from the higher average number of selections made by users who identified at least one barrier compared to those who did not (5.3 selections compared to 2.1 selections by users who did not select at least one barrier). Given the difference in the average number of selections made, an iOS user who selected any barrier, is more likely than not to have selected any other factor. Contrary to Apple's submission, this does not indicate a genuine relationship, nor does it undermine the classification of barriers, but is a result of the analytical approach taken.
- (b) The evidence shows that iOS users report factors associated with both barriers and preferences as reasons for not switching. Our view is that selecting both types of factors does not make the barrier invalid.
- C.48 When replicating the analyses to consider the claims made by Apple above, we found the same spurious patterns emerge when looking at the data from different perspectives due the analytical approach taken (which we consider

³³ Submission from Apple [REDACTED].

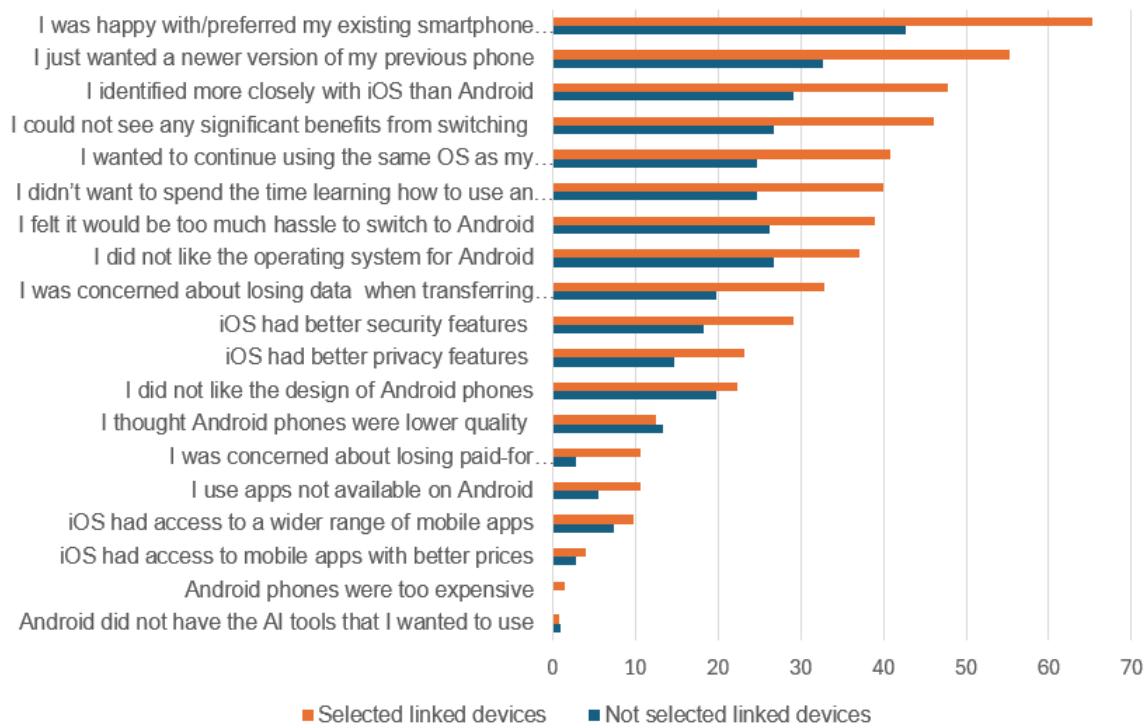
³⁴ Submission from Apple [REDACTED].

³⁵ Submission from Apple [REDACTED].

is not suitable for this data). For example, when looking specifically at iOS users that had selected ‘I was happy with/preferred my existing smartphone brand’, we found that these users were more likely than their counterparts not selecting this preference to have selected each of the barriers.³⁶

C.49 We illustrate this pattern below with the analysis of iOS users selecting the switching barrier ‘I had other devices linked to my current phone/operating system’. Figure C.1 shows a consistent pattern whereby respondents selecting the linked devices barrier among their reasons for not switching are also more likely to have selected other reasons for not switching, including barriers.

Figure C.1: iOS users’ reasons for not switching, by whether selected linked devices barrier



Source: CMA analysis of microdata from the Accent Mobile Consumer Survey

C.50 In its analysis, Apple stated that the ‘preference’ indicators shown for their analysis represent the ‘most frequently selected response options’.³⁷ However, CMA analysis found a different pattern. When replicating Apple’s analysis, we found that the most frequently selected reasons meeting Apple’s criteria for ‘preference’ indicators includes one factor which is not analysed: ‘I did not like the operating system for [Android] phones’. We noted

³⁶ CMA analysis of Accent Mobile Consumer Survey.

³⁷ Submission from Apple [redacted].

Apple's decision to exclude this reason from their analysis and instead presented analysis for the sixth most frequently selected 'preference' indicator, 'I thought iOS had better privacy features'.³⁸

- C.51 We do not replicate here all of the analysis conducted by Apple in Appendix C of its analytical report which seeks to further demonstrate the co-selection of preferences and barriers. We consider that the CMA analysis presented above is sufficient to demonstrate the patterns identified by Apple.
- C.52 In conclusion, we do not consider that the analysis conducted by Apple makes a compelling case for rejecting our classification of switching barriers. The Accent Mobile Consumer Survey findings demonstrated that the survey question was successful in enabling respondents to distinguish between a wide range of reasons for not switching. Respondents selecting more than one reason were asked to select their most important reason (and their second and third most important reason where they selected three or more reasons). In this way the survey allowed respondents to determine which factors had driven their decision not to switch.

Consumer awareness and preferences

- C.53 Apple submitted that the consumer evidence suggests 'consumers are highly aware of alternatives, actively compare platforms, and make deliberate choices'.³⁹
- C.54 We do not agree with this assessment of the evidence. We briefly present Apple's evidence and our considered response below.
- a. Apple submitted that nearly half of iOS users have previously owned an Android device, as indicated in the Accent Mobile Consumer Survey, and that users 'actively compare platforms before choosing'.⁴⁰ We consider that only 11% of iOS users had switched operating system when they obtained their current smartphone (giving them relatively recent experience of Android), while 37% were likely to have not used an Android for several years, as their previous smartphone was also iOS (the remaining 51% had never owned an Android smartphone).⁴¹ The

³⁸ We consider that possibly Apple included analysis of the purchase factors (Q6b) response option, 'operating system', in their analysis. However, 'operating system' was not a frequently selected purchase factor, being the 7th most frequently selected purchase factor by iOS users. Accordingly we have not replicated that analysis.

³⁹ Submission from Apple [REDACTED].

⁴⁰ Submission from Apple [REDACTED].

⁴¹ [Accent Mobile Consumer Survey](#), page 32.

findings do not imply that these users have sufficient current knowledge to enable an up-to-date comparison of platforms.

- b. Apple submitted that the Kantar Worldpanel ComTech Mobile Survey ‘shows that 33% of satisfied iOS users still consider non-Apple brands like Samsung and Google for their next purchase’.⁴² In contrast to this study, our consumer survey found that 15% of users whose previous smartphone was iOS either switched or considered switching to Android.⁴³ The precise source of Apple’s statement based on the Kantar Worldpanel ComTech Mobile Survey is not clear from the submission. In addition, the source contains limited methodological information of the survey. Therefore, the extent to which it supports Apple’s submission cannot be thoroughly assessed, and we consider our consumer survey to be more reliable as it was designed to provide robust evidence which is directly relevant to the issues considered as part of this investigation.
- c. Apple submitted that [REDACTED].⁴⁴ We consider that, at face value, the [REDACTED].⁴⁵ In contrast to this study, our consumer survey found that 24% of users whose previous smartphone was Android either switched or considered switching to iOS.⁴⁶ Direct comparisons of the two sources are difficult because the questions are measuring somewhat different things. We consider our consumer survey to be more reliable as it was designed to provide robust evidence which is directly relevant to the issues considered as part of this investigation. Respondents to the Accent Mobile Consumer Survey were asked specifically about whether they switched or considered switching to or from iOS when they last got a new smartphone. In contrast, [REDACTED]. In addition, the documentation we obtained contains very limited methodological detail by which to understand how robust the findings are, and therefore how the findings can be interpreted.
- d. Apple submitted, ‘the PDD’s interpretation of certain survey responses as evidence of disengagement—such as “I could not see any significant benefits from switching” or “I just wanted a newer version of my previous phone”—is flawed’, because some of these respondents also selected reasons for not switching that indicated a comparison between iPhones and Android devices.⁴⁷ We consider that, while some reasons given may indicate a knowledgeable comparison between iOS and Android (eg ‘I did

⁴² Submission from Apple [REDACTED].

⁴³ [Accent Mobile Consumer Survey](#), Figure 27.

⁴⁴ Submission from Apple [REDACTED].

⁴⁵ Submission from Apple [REDACTED].

⁴⁶ [Accent Mobile Consumer Survey](#), Figure 27.

⁴⁷ Submission from Apple [REDACTED].

not like the operating system for Android phone'), most reasons could equally be based on perception as much as knowledge (eg 'I thought Android phones were lower quality'). When developing the questionnaire we added 'I thought...' to several of the response options in recognition of the fact that user reasoning may be based on perception rather than personal experience or knowledge. Other reasons did not name the alternative operating system (eg 'I thought iOS had better security features'). As such, while some users may indicate genuine preferences, we cannot infer that they have high levels of knowledge in relation to the specific offerings of the alternative operating system.

Methodological aspects of the Accent Mobile Consumer Survey

The importance of security and privacy for users

- C.55 In its response to the Proposed Decision Apple submitted that the Accent Mobile Consumer Survey systemically underestimates the importance of privacy and security to UK iPhone users.⁴⁸
- C.56 In the analytical report submitted by Apple, Apple disagreed with the way the Accent Mobile Consumer Survey measures factors that are most important in a user's decision to get a particular smartphone. [§]. Apple submitted that it had raised a concern with measurement of purchase factors in its response to the Invitation to Comment on the Accent Mobile Consumer Survey.⁴⁹
- C.57 The concerns expressed by Apple with regard to the measurement of the importance of security and privacy to users had previously been submitted by it in its responses to the MBCG MI.⁵⁰
- C.58 The CMA addressed Apple's concerns, including an assessment of the Apple iPhone Buyer Surveys and the precise reasons for the chosen question design in an annex to the MBCG MI Final Report.⁵¹ The CMA concluded that the approach used in the Apple iPhone Buyer Survey is likely to be measuring privacy and security as 'hygiene factors' which consumers

⁴⁸ [Apple's response to Proposed Decision](#), paragraph 78.

⁴⁹ Submission from Apple [§].

⁵⁰ See MBCG MI.

⁵¹ MBCG MI, [Appendix C: Consumer behaviour in the mobile browser market: Methodological assessment of CMA research and other research](#).

expect to be present in smartphones, rather than as differentiating factors that drive purchase decisions.⁵²

- C.59 For this investigation, Apple stated (in response to the invitation to comment on the draft survey)⁵³ that our approach to measuring the most important factors that drive smartphone purchase decisions should not be limited to asking for the top five most important ones. To address this concern, we removed this restriction and stated that respondents should select all that apply. The survey results align with our previous finding that, relative to other factors, security and privacy were not commonly selected as being among the most important.⁵⁴
- C.60 In response to the Proposed Decision and Accent Mobile Consumer Survey report, Apple submitted that CMA's question on the factors that are most important in a user's decision to get a particular smartphone 'did not spell out how many of the "*most important*" factors respondents should select', leading survey respondents to select fewer factors.⁵⁵ In fact, the question clearly stated that respondents should select all factors that apply, and the wide range in the number of factors selected demonstrates that respondents understood and followed this instruction.⁵⁶
- C.61 In the analytical report, Apple presented survey data from the Accent MEMS Survey and [REDACTED]. In relation to the question asked in the Accent Mobile Consumer Survey, Apple submitted that 'Many respondents who regard privacy and security as important may not have selected these factors as "most important" to their device choice.'⁵⁷
- C.62 Our assessment of the Apple iPhone Buyer Survey remains that it demonstrates the importance that people attach to their security and privacy in relation to their smartphone and more generally. However, in relative terms, security and privacy are not important factors driving the choice of smartphone for most people. Apple's submission recognises this: 'In eliciting the relevance of purchase-driving factors, the [Accent Mobile Consumer Survey] question design nudges users to focus on salient factors.' Apple submitted that the survey design 'introduces a bias toward diminishing the

⁵² CMA (2018) [Good practice in the design and presentation of customer survey evidence in merger cases](#), footnote 22, provides the following example to illustrate hygiene factors: 'For example, it is essential that supermarkets provide lighting, trolleys and accept payments by cash or card, but these are 'hygiene factors' that customers will take for granted as being offered by all supermarkets and so are not differentiating factors in the way that prices or location might be.'

⁵³ [SMS investigation into Apple's mobile platform - GOV.UK](#).

⁵⁴ [Accent Mobile Consumer Survey](#), section 3.3.

⁵⁵ Submission from Apple [REDACTED].

⁵⁶ [Accent Mobile Consumer Survey](#), page 20.

⁵⁷ Submission from Apple [REDACTED].

stated importance of factors that are important to consumers but less salient'.⁵⁸ We consider that contrary to this making the Accent Mobile Consumer Survey question design unreliable, our survey question is a robust measure precisely because it differentiates between the 'most important' factors for purchase, and hygiene factors, which are less relevant to the investigation.

C.63 Apple submitted two further market research sources to support its view.

C.64 The first was [REDACTED].⁵⁹ Our assessment of this evidence is that it indicates the general importance of security and privacy to smartphone users, which we do not disagree with. We consider that this study has less evidential weight than the Accent Mobile Consumer Survey for this investigation because:

(a) Evidence we obtained contains very limited methodological detail by which to understand how robust the findings are, and therefore how the findings can be interpreted.

(b) [REDACTED]

(c) [REDACTED].⁶⁰ [REDACTED], to be less reliable than the measure used in the Accent Mobile Consumer Survey (the latter being based on users' reported reasons for choosing the specific phone they actually obtained).

C.65 The second source provided by Apple was an article by GSMA Intelligence based on survey evidence, which Apple submitted had 'found that "Nine in ten global consumers are concerned over smartphone data security and privacy" and over 60% of consumers (64%) put security as "very important" in their purchase criteria for smartphones. While a further 26% say it is "somewhat important", placing it in their top three most important considerations when buying smartphones'.⁶¹ The GSMA Intelligence article lacks sufficient methodological detail to assess its evidential value.⁶²

C.66 We place significantly more evidential weight on the Accent Mobile Consumer Survey when assessing the importance of security and privacy to users when choosing their smartphone. We are confident that when measuring the main factors that drive users' smartphone purchase

⁵⁸ Submission from Apple, [REDACTED].

⁵⁹ We note that the percentage for Android users appears very similar to that for iPhone users in the graph presented (though with a small difference in the constituent 'push' and 'pull' factors). Submission from Apple [REDACTED].

⁶⁰ Submission from Apple [REDACTED].

⁶¹ Submission from Apple [REDACTED].

⁶² GSMA, '[Did you know security is so important in 2023 it is influencing consumer buying decisions for smartphones?](#)', dated 6 March 2023, accessed by the CMA on 15 September 2025.

decisions, the approach adopted by Accent Research has provided robust data.

Accent Mobile Consumer Survey response rate

- C.67 In Apple's written submission to our Proposed Decision, it states that the response rate was low given the evidential weight put on the findings: 'many findings are derived from a CMA-commissioned survey, which had a response rate of only 7.6%'.⁶³
- C.68 We are content that the Accent Mobile Consumer Survey is robust due to the following considerations:
- (a) the response rate of 7.6% is above the threshold of 5% that the CMA typically applies to consumer surveys;⁶⁴
 - (b) the survey used a robust random probability sampling methodology which is recognised as producing robust findings, more suited to making inference from than non-probability methods; and
 - (c) the response rate is only one indicator of quality. An assessment of the representativeness of the sample was also undertaken by Accent Research, and is documented in the Accent Mobile Consumer Survey report.⁶⁵

⁶³ [Apple's response to Proposed Decision](#), paragraph 18.

⁶⁴ Good Practice in the design and presentation of customer survey evidence in merger cases [Survey good practice](#).

⁶⁵ [Accent Mobile Consumer Survey](#), section 2.5.