

Consultation: User Choice Conduct Requirement

Google's general search services

23 September 2026

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The Competition and Markets Authority has excluded from this published version of the final 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 Some numbers have been replaced by a range.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. Introduction

- 1.1 Under the Digital Markets Competition Regime, where a firm has strategic market status (**SMS**) in a digital activity linked to the UK, the CMA can impose proportionate requirements as to how that firm must conduct itself in relation to that digital activity (conduct requirements or **CRs**).¹
- 1.2 On 10 October 2025, we designated Google as having SMS in general search services. On 28 January 2026, we consulted on a series of CRs, including [our proposal](#) for a CR to improve the choice architecture² provided by Google in relation to default search services, to enable consumers to make informed and effective choices and promote greater competition among search providers (**User Choice CR**).³ The rationale for, and importance of, this can be found in section 1 of that consultation document.
- 1.3 Furthermore, since our consultation, Google has announced a number of potentially significant changes to the way its search service operates.⁴ We also continue to observe trends in the market, with signs that ever more users are adopting generative AI-based tools, such as AI assistants, for search as well as being presented with AI summaries on ‘traditional’ search services.⁵ We want to ensure our proposals fully reflect these developments.
- 1.4 Having considered the representations we received in response to that consultation, further evidence and the broader developments in the market, we are launching a further consultation on an updated set of proposals. This document sets out our revised approach. The key changes we have made to the proposed CR since the previous consultation focus on the following areas:⁶

¹ For more information about the Digital Markets Competition Regime established under the Digital Markets, Competition and Consumers Act 2024 (the **Act**), Google’s designation with SMS in general search and the framework for considering CRs, see the [‘Introduction to the consultation’](#) document published in the context of the January 2026 consultation.

² ‘Choice Architecture’ refers to the way that choices are presented to consumers and how they influence decision making. As defined, see: Centre on Regulation in Europe, [Choice architecture for end users in the DMA \(2023\)](#), page 5. For a detailed review of the impact of online choice architecture on consumer choice and competition, see: CMA, [Evidence review of Online Choice Architecture and Consumer and Competition Harm \(2022\)](#), paragraph 1.6. Both accessed by the CMA on 25 January 2026.

³ [Google’s general search services: proposed conduct requirements - GOV.UK](#).

⁴ See [Google \(2026\) A new era for AI Search](#), accessed by the CMA on 28 August 2026.

⁵ See [Ofcom \(2025\) Online Nation Report](#), accessed by the CMA on 28 August 2026; [SensorTower \(2026\). State of AI Report](#), accessed by the CMA on 28 August 2026.

⁶ The decision to conduct this consultation is not based upon any suggestion that it is required due to the scope of these changes, either individually or taken together, nor should it be taken to amount to a precedent for how

- (a) the design of the eligibility criteria that services would need to meet in order to be able to appear on the choice screen (the **Search Choice Screen**), to improve their clarity and to ensure they are technology neutral given the continued evolution in the way services are incorporating AI and how users are searching for information online, including through AI assistants;
- (b) additional detail on the process for determining eligibility, to ensure the process is transparent, fair and robust for applicants given that it will be run by Google;
- (c) changes to the ‘test-drive’ and annual redisplay elements of the proposed CR, to ensure they deliver benefits without imposing disproportionate costs on Google, original equipment manufacturers (**OEMs**) and end-users; and
- (d) revisions to the design of choice architecture, Device-Level Default Settings and the search default setting API to improve users’ and search providers’ experience.

1.5 This document sets out the following:

- (a) [Section 2](#): the aim of our User Choice CR;
- (b) [Section 3](#): our proposed User Choice CR and Interpretative Notes;
- (c) [Section 4](#): our assessment of the effectiveness of our proposed User Choice CR;
- (d) [Section 5](#): proportionality assessment of our proposed User Choice CR; and
- (e) [Section 6](#): questions for consultation.

the CMA may approach similar changes to CRs going forward. Instead, we are seeking further feedback on whether these specific proposed changes properly address the concerns we have identified (as set out below) and will result in an effective and proportionate User Choice CR (as set out in Sections 4 and 5 below) before imposing any such CR, pursuant to section 24 of the Act.

2. The aim of the User Choice CR

Our proposed approach in the January 2026 consultation

- 2.1 In the January 2026 consultation, the aim of the proposed User Choice CR was to improve Google's current search choice screens and related choice architecture in order to improve UK users':
- (a) awareness of the broad range of available search providers;
 - (b) engagement with, and confidence in, their choice of search provider; and
 - (c) ability to choose quickly and easily between search providers on key Google-operated access points, such that they can choose a search provider that best meets their needs.
- 2.2 We explained that our proposed User Choice CR would:
- (a) pursue the open choices objective (section 19(7) of the Act): that users or potential users of general search services⁷ are able to choose freely and easily between the services or digital content provided by Google and services or digital content provided by other undertakings; and
 - (b) fall under the permitted type set out in section 20(2)(e) of the Act, which permits obligations to present to users or potential users any options or default settings in relation to general search services in a way that allows those users or potential users to make informed and effective decisions in their own best interests about those options or settings.
- 2.3 We considered that the proposed User Choice CR would likely:
- (a) improve consumers' awareness of, engagement with and confidence in, search services and their ability to switch default search providers easily and quickly; and
 - (b) support the growth of rival search services, which, in turn, could lead to an improvement in those providers' services, supporting more competition in search and incentivising innovation and investment in services that consumers value.

⁷ These terms have broad meanings: see section 118(1) and (2) of the Act and the explanatory notes to the Act, paragraph 533(f) and (g).

Summary of responses

- 2.4 Responses to the January 2026 consultation on our proposed aim were broadly supportive but ranged in views on how effective the proposed CR would be at achieving the aim.
- 2.5 We received a submission from a collective of stakeholders that we should consider expanding the scope of the proposed CR to include giving consumers more direct control over how Google displays search results (ie in relation to whether search generative AI features, such as AI Overviews, are displayed automatically in response to search queries).⁸

Our current proposed approach

- 2.6 We continue to consider that the aim, statutory objective, permitted type and consumer benefits remain as set out in the January 2026 consultation.
- 2.7 We do not consider that the collective of stakeholders' proposed expanded scope is necessary. We have not received sufficiently strong evidence of the specific issues such an expanded scope would seek to address, nor of the benefits of giving consumers these controls.⁹ However, we will keep the case for further measures under review and are open to receiving further evidence on this point.

⁸ Preiskel & Co LLP Letter on behalf of the Independent Media Association, The Independent Publishers Alliance, Impress Media and the Movement for an Open Web to the CMA's proposed Search SMS Conduct Requirements.

⁹ For completeness, we also do not consider that such an intervention would achieve the aim articulated in our January 2026 consultation: it would give users more control over specific aspects of Google's services, rather than increasing their awareness of, engagement with, and ability to choose between different search providers.

3. Our proposed User Choice CR and interpretative notes

Proposed User Choice conduct requirement

- 3.1 Having identified our aim (see paragraphs 2.1 and 2.6) based on the concerns described in the January 2026 consultation,¹⁰ we are proposing to impose the following draft User Choice CR on the basis of the effectiveness and proportionality analysis set out in sections 4 and 5 below respectively.

Definitions

1. In this conduct requirement:
 - a. **Android Devices** means devices which use the Android mobile operating system (Android OS).
 - b. **API** means an application programming interface.
 - c. **Browser Default Setting** means the setting that provides Users with the ability to select a new Default Search Provider on Relevant Browsers.
 - d. **Default Search Provider** means a User's choice of provider to be the default search service to respond to User queries via some or all of the Relevant Access Points.
 - e. **Device-Level Default Setting** means a single setting that provides Users with the ability easily to select a new Default Search Provider on all Relevant Access Points on a Relevant Device from a list of installed or pre-installed Eligible Providers.
 - f. **Eligibility Criteria** means the following criteria:
 - i. Adequately address the full range of use cases of a general search service on a wide range of subjects, including by searching the web.
 - ii. Provide a functioning general search experience for relevant search access points.
 - iii. Be considered by a significant proportion of UK users of the service to provide a general search service.
 - g. **Eligible Providers** means applicants that have been determined by Google to meet the Eligibility Criteria.
 - h. **New Relevant Browser** means a Relevant Browser that has been installed, downloaded or otherwise set up by a User after the date on

¹⁰ [CMA consultation on proposed User Choice CR](#), section 1.

which Google shows a Search Choice Screen pursuant to paragraph 2.a.i.

- i. **New Relevant Device** means a Relevant Device that is distributed after this conduct requirement fully comes into force.
- j. **Prompt** means a screen or notification presented to a User (other than a Search Choice Screen or notification shown pursuant to paragraph 2, 8 or 9) which relates to their default search settings, including their Default Search Provider, on Relevant Browsers and Relevant Devices.
- k. **Relevant Access Points** means:
 - i. on a Relevant Browser, the address bar; and
 - ii. on a Relevant Device, the default search application Search Widget and the address bar on the Chrome application.
- l. **Relevant Browser** means the Google Chrome application on any desktop, mobile or tablet operating system (including Windows, Android OS and iOS/iPadOS) meant for distribution in the UK where Google has set Google Search as the default search service on the browser, other than when it is installed on a Relevant Device.
- m. **Relevant Device** means any Android Device meant for distribution in the UK where the original equipment manufacturer of the device has selected to pre-install the Google Search application, a Search Widget and/or the Chrome application and set Google Search as the default search service on the Search Widget and/or Chrome application.
- n. **Search Choice Screen** means a user interface through which the User can select an Eligible Provider to be their Default Search Provider on the Relevant Access Points.
- o. **Search Widget** means the search bar placed on the home screen of a Relevant Device through which searches can be conducted.
- p. **User** means an end user of a Relevant Browser or Relevant Device.

Search Choice Screen

- 2. Google shall show Users, or ensure that Users are shown:
 - a. on Relevant Browsers:
 - i. a Search Choice Screen that cannot be skipped as part of the first major update to Relevant Browsers after the date on which this conduct requirement fully comes into force; and
 - ii. a notification that is skippable and visually limited which, if selected, takes the User to a Search Choice Screen at least once a year following the Search Choice Screen provided pursuant to paragraph 2.a.i. above as part of a major update to Relevant Browsers;

- b. on New Relevant Browsers, a Search Choice Screen that cannot be skipped on first use or setup; and
 - c. on New Relevant Devices:
 - i. a Search Choice Screen that cannot be skipped on first use or setup; and
 - ii. a notification that is skippable and visually limited which, if selected, takes the User to a Search Choice Screen at least once a year, beginning with the first major update to New Relevant Devices after the date on which this conduct requirement fully comes into force.
- 3. However, Google is permitted not to show a notification on a Relevant Browser or New Relevant Device pursuant to paragraphs 2.a.ii. or 2.c.ii. where the User has made a deliberate decision to select or change its Default Search Provider in the six months prior to the date on which the notification would otherwise be shown on that Relevant Browser or New Relevant Device pursuant to paragraphs 2.a.ii. or 2.c.ii.
- 4. Each Search Choice Screen shown pursuant to this conduct requirement shall provide Users with the ability to choose a Default Search Provider on the Relevant Access Points from a reasonable number of Eligible Providers, which shall be listed in a fully random order and require Users to scroll through the full list of Eligible Providers before confirming their choice.
- 5. If the total number of Eligible Providers approved pursuant to paragraph 12 totals twelve or fewer, all Eligible Providers shall be included on each Search Choice Screen shown pursuant to this conduct requirement.
- 6. If the total number of Eligible Providers approved pursuant to paragraph 12 totals more than twelve, Google shall:
 - a. select the twelve Eligible Providers to be included on each Search Choice Screen shown pursuant to this conduct requirement fairly; and
 - b. provide Users with the ability to view all Eligible Providers other than those included on that Search Choice Screen pursuant to paragraph 6.a. and select them as a Default Search Provider on the Relevant Access Points.
- 7. Once a User has selected a Default Search Provider through a Search Choice Screen, Google shall ensure that the selected Default Search Provider is set as the default search service on all Relevant Access Points. In particular:

- a. on a Relevant Browser, the selected Default Search Provider must be set as the default to respond to a User's queries through the address bar; and
- b. on a Relevant Device, the selected Default Search Provider must be set as: (i) the default search application; (ii) either the default Search Widget or as the default to respond to a User's queries entered into Google's Search Widget; and (iii) the default to respond to a User's queries through the address bar.

'Test-drive' function

8. Google shall ensure that any Search Choice Screen shown pursuant to this conduct requirement on Relevant Browsers and New Relevant Devices offers Users an option to select a Default Search Provider for the Relevant Access Points for a short, defined trial period.
9. At the end of the short, defined trial period, Google shall show the User, or ensure that the User is shown, a notification that is skippable and visually limited which, if selected, takes the User to the Browser Default Setting on Relevant Browsers or the Device-Level Default Setting on New Relevant Devices. However, if the User deliberately changes their Default Search Provider on any Relevant Access Point during the 'test-drive' period, no notification needs to be shown pursuant to this paragraph.

Information Screen

10. Google shall ensure that any Search Choice Screen shown pursuant to this conduct requirement is immediately preceded by a screen providing clear, accurate and balanced information to Users to assist them in selecting a Default Search Provider.
11. If a User selects to conduct a 'test-drive' pursuant to paragraph 8, Google shall ensure that the Search Choice Screen is immediately followed by a confirmation screen, which confirms their selection of a Default Search Provider on a 'test-drive' basis.

Approval of Eligible Providers

12. Google shall establish a clear, fair, robust and transparent process for approving Eligible Providers every six months by reference only to the Eligibility Criteria. Such process shall include:

- a. sufficient public and prominent notice published two weeks in advance of the application window referenced in paragraph 12.b., including clear information about the process, timings and information that applicants need to provide;
- b. an application window which is open for an appropriate length of time; and
- c. by no later than two months from the start of the application window:
 - i. final decisions being taken by Google in relation to whether each applicant has been approved to be an Eligible Provider; and
 - ii. written confirmation to:
 - 1. each applicant of Google's final decision whether to approve them to be an Eligible Provider; and
 - 2. the CMA of Google's final decisions in relation to all applicants, which should include detailed reasoning in relation to any rejection.

Device-Level Default Setting and Browser Default Setting

13. Google shall provide Users, or ensure that Users are provided, with a Device-Level Default Setting on a Relevant Device through a process that is accessible and straightforward.
14. Google shall ensure that the selection of a new Default Search Provider through the Device-Level Default Setting has the same effect as the selection of a Default Search Provider on the Search Choice Screen, as set out in paragraph 7.b.
15. Where the Device-Level Default Setting or the Browser Default Setting does not allow a User to choose from all Eligible Providers directly, Google shall provide Users with the ability to view all Eligible Providers and to take the steps necessary in order to choose them as the Default Search Provider.

Eligible Provider APIs and settings access

16. When a User visits an Eligible Provider's website on a Relevant Browser or on the Chrome application on a Relevant Device, Google shall provide that Eligible Provider, or ensure that Eligible Provider is provided, with:
- a. an API through which it can be made aware of whether it is that User's Default Search Provider in relation to the Relevant Browser or the Chrome application on the Relevant Device; and

- b. the ability to take that User directly to the Browser Default Setting on Relevant Browsers or the Chrome application default setting on the Relevant Device.

17. When a User opens an Eligible Provider's application or enters a query through an Eligible Provider's Search Widget on a Relevant Device, Google shall provide that Eligible Provider, or ensure that Eligible Provider is provided, with:
- a. an API through which it can be made aware of whether it is that User's Default Search Provider in relation to the Relevant Device; and
 - b. the ability to take that User directly to the Device-Level Default Setting on the Relevant Device.

Prompts

18. Google shall ensure that any Prompts are presented in a fair and balanced way.

Proposed interpretative notes

- 3.2 The CMA may publish interpretative notes to accompany a CR. Interpretative notes provide greater clarity over the CMA's interpretation of a CR, including how it may apply in particular circumstances, for the benefit of both the SMS firm and other industry participants.¹¹ It would be open to the SMS firm to take a different approach to the one outlined in the interpretative notes where it is able to demonstrate to the CMA that its approach complies with the terms of the CR.¹²
- 3.3 We propose that the User Choice CR be accompanied by the following set of interpretative notes.

Choice Design Principles

1. Google should ensure all user choice architecture related to selecting or changing a Default Search Provider, including the Search Choice Screen, notifications that take Users to the Search Choice Screen, the Device-Level Default Setting, the Browser Default Setting and any Prompts, is targeted, understandable and balanced. The design and implementation of choice architecture can significantly impact Users' ability to make effective and

¹¹ See [Digital Markets Competition Regime Guidance](#) (CMA194), paragraphs 3.59 to 3.60.

¹² See [Digital Markets Competition Regime Guidance](#) (CMA194), paragraph 3.61.

informed choices. Google's choice architecture should be based on the following three broad choice design principles:

- a. Targeted – presenting choices to Users at the right place, at the right time, with the right frequency. This includes identifying suitable points for the choice to be presented and ensuring that Users' preferences are consistently applied. Users should be prompted when they are most likely to engage with the choice. Users can learn from previous experience (including mistakes) and their preferences can also change over time. It is important to give Users the opportunity to make choices more than once, which can help them learn but also let them change without encountering difficulty whenever they choose. However, asking Users too often can overwhelm them and lead to poor decisions.
 - b. Understandable – giving choices that Users understand. This includes designing the layout or presentation of choices to ensure that Users adequately understand the choice and can make decisions in their best interests.
 - c. Balanced – giving Users autonomy and minimising unjustified friction. Users should have the ability to make important choices with their preferences implemented and respected. This includes the balanced presentation of options, whereby visual information such as colours, highlighting and framing is not used to influence Users towards certain decisions. Balanced choice architecture seeks to find the right amount of friction for Users – minimising unjustified friction and understanding where friction can be positive (eg confirming an important action). It also means neutral framing of options, so as not to influence Users towards making certain decisions that may not be in their best interests.
2. In seeking to design effective choice architecture, it may be desirable that design choices are tested with Users before they are implemented.

Definitions

3. For the avoidance of doubt, for the purposes of this conduct requirement:
 - a. references to Relevant Browsers shall include New Relevant Browsers;

- b. references to Relevant Devices shall include New Relevant Devices; and
- c. the Chrome application on Relevant Devices shall be considered a Relevant Access Point on the Relevant Device, not a Relevant Browser.

Search Choice Screen

- 4. Paragraphs 2 to 7 of the conduct requirement set out Google's obligations in relation to the Search Choice Screen, to be shown on Relevant Browsers and Relevant Devices.
- 5. Google may determine the exact point of set-up or update at which the Search Choice Screens and notifications to be shown pursuant to paragraph 2 of the conduct requirement appear.
- 6. If the Relevant Browser or New Relevant Device is also eligible to see another type of choice screen at the same time as any Search Choice Screen shown pursuant to paragraph 2 of the conduct requirement, Google may determine the optimal order (from a User's perspective) to show the choice screens.
- 7. We expect that the Search Choice Screens shown annually pursuant to paragraphs 2.a.i, 2.a.ii. and 2.c.ii. of the conduct requirement will be done as part of a major update to Relevant Browsers or restart process connected to a New Relevant Device major software update. Nothing in this conduct requirement is intended to require Google to alter the dates of these major updates.
- 8. The Search Choice Screens to be shown pursuant to paragraph 2.a.i., 2.b. and 2.c.i. of the conduct requirement cannot be skipped; however, the Search Choice Screens shown pursuant to paragraph 2.a.ii. and 2.c.ii. will be skippable and visually limited (by which we mean that they occupy limited screen space and they easily allow the User to continue their existing tasks).
- 9. Google should ensure that Eligible Providers are given sufficient advance notice of when the notification will be shown to Users pursuant to paragraphs 2.a.ii or 2.c.ii. of the conduct requirement so that they can prepare marketing campaigns in advance and maximise their chances of being selected through the Search Choice Screen. For the avoidance of doubt, this does not mean that the Search Choice Screens shown pursuant to paragraphs 2.a.ii. or 2.c.ii. of the conduct requirement need to be shown at the same time.

10. Paragraph 3 of the conduct requirement allows Google to decide not to show a Search Choice Screen pursuant to paragraphs 2.a.ii. or 2.c.ii. of the conduct requirement where the User has deliberately decided to select or change their Default Search Provider in the previous six months. This would capture, for example, where a User:
 - a. first sets up their New Relevant Device (and are therefore shown a Search Choice Screen pursuant to paragraph 2.c.i. of the conduct requirement) within six months of the date on which the Search Choice Screen is shown across all Relevant Devices (and would therefore be expected to be shown a Search Choice Screen pursuant to paragraph 2.c.ii. of the conduct requirement); or
 - b. changed their Default Search Provider via the Browser Default Setting or the Default Device-Level Setting within six months of the date on which the Search Choice Screen is shown pursuant to paragraphs 2.a.ii. or 2.c.ii. of the conduct requirement.
11. Paragraph 4 of the conduct requirement provides that each Search Choice Screen must include a reasonable number of Eligible Providers, which are to be listed in a fully random order and should require Users to scroll through the full list before confirming their choice. Where there are 12 or fewer total Eligible Providers, paragraph 5 of the conduct requirements provides that the Search Choice Screen must include all options.
12. Where the number of Eligible Providers is more than 12, paragraph 6 of the conduct requirement provides that the 12 Eligible Providers listed on a Search Choice Screen must be selected fairly and that Users must have the ability to view the remaining Eligible Providers from the Search Choice Screen and choose one of them as their Default Search Provider.
13. We expect the fair process by which Google selects the 12 Eligible Providers to be included on each Search Choice Screen pursuant to paragraph 6.a. of the conduct requirement to involve including:
 - a. the five most popular Eligible Providers (for the first six months after the conduct requirement fully comes in force, this should be based on a reasonable metric, such as Google Play Store downloads, following which this should be based on the number of times each Eligible Provider has been chosen as Default Search Provider from the Search Choice Screen as a proportion of the number of times they have been included on the Search Choice Screen); and

b. seven other Eligible Providers, to be selected fully at random.

14. We also expect Google to take into account any technical implications as well as the choice design principles described in paragraph 1 above when determining how to provide the ability to view the remaining Eligible Providers pursuant to paragraph 6.b. of the conduct requirement.
15. The CMA would expect Google to liaise with Eligible Providers to obtain a short description of their service to be included as part of the Search Choice Screen. If an Eligible Provider charges a User, or has a limited number of free queries, the CMA expects this short description to make Users aware of this.
16. Once a User has selected a Default Search Provider through a Search Choice Screen, Google is required to take all necessary steps to set that Default Search Provider as the default for all Relevant Access Points on that Relevant Browser or Relevant Device, as set out in paragraph 7 of the conduct requirement.

‘Test-drive’ function

17. Pursuant to paragraph 8 of the conduct requirement, Google is required to offer a ‘test-drive’ option on any Search Choice Screen shown pursuant to this conduct requirement, providing a User with the option of testing a Default Search Provider for a short, defined trial period.
18. Google may determine the length of time for which a User would have the ability to ‘test-drive’ an Eligible Provider as the default. In doing so, Google should have regard to the need for the User to become familiar with the Default Search Provider and may use user testing to determine the appropriate length of time. Google may also consider giving consumers an option to select their preferred duration of their ‘test-drive’ within a defined range. However, the CMA considers that the ‘test-drive’ period should not be shorter than a week.
19. At the end of any ‘test-drive’ period of an Eligible Provider, the User should be given a skippable and visually limited (see paragraph 8 above) notification that, if selected, takes the User to the Browser Default Setting for Relevant Browsers and the Device-Level Default Setting for Relevant Devices.
20. However, where a User has deliberately changed Default Search Providers on any Relevant Access Point during the ‘test-drive’ period, Google is not required to provide them with the notification at the end of that period. For the avoidance of doubt, the CMA considers that Users making other, potentially cosmetic decisions that may impact their Default Search Provider (eg deleting

the Search Widget from the homepage of a Relevant Device) would not amount to that User deliberately changing Default Search Providers, but using the Device-Level Search Setting would.

Information screen

21. The information screen required pursuant to paragraph 10 of the conduct requirement must be displayed immediately prior to any Search Choice Screen shown pursuant to this conduct requirement.
22. It should contain clear, accurate and balanced information about what a search service is and how the User's choice will affect their settings and search experience.
23. The information screen should also clearly explain to Users the key features of the Eligible Providers that may appear on the Search Choice Screen. This will help Users make informed decisions and set appropriate expectations about the nature of the Default Search Provider they are selecting.
24. Where the information screen is shown alongside additional choice screens, the content of the information screen should be modified accordingly to ensure Users understand the nature and implications of the choices they are making across different services.
25. Where a User chooses to undertake a 'test-drive', paragraph 11 of the conduct requirement provides that the Search Choice Screen must immediately be followed by a confirmation screen that confirms the details of the 'test-drive'.

Approval of Eligible Providers

26. Paragraph 12 of the conduct requirement requires Google to determine Eligible Providers by reference only to the Eligibility Criteria.
27. Nothing required in the Eligibility Criteria should involve any obligation on an applicant to provide confidential information to Google in order to demonstrate eligibility.
28. Google must run the approval process set out in paragraph 12 of the conduct requirement every six months. Existing Eligible Providers are not required to submit fresh applications every six months. If Google has concerns as to whether an existing Eligible Provider continues to meet the Eligibility Criteria,

it can conduct a further assessment (including seeking further information from that Eligible Provider as necessary).

Criterion 1

29. The first criterion (paragraph 1.f.i. of the conduct requirement) is designed to ensure that Eligible Providers can and do meet User needs for a general search service (ie 'use cases'). These use cases may change over time, so we will continue to assess key User needs for general search services and may update these interpretative notes accordingly. We currently consider the full range of use cases to be the following:
- a. online navigational queries (eg to find a specific website, webpage or app);
 - b. transactional queries (eg to find a product or service a User may wish to buy);
 - c. simple informational queries (eg to find basic facts, the location of something, news, or real-time information); and
 - d. more complex informational queries (eg to explore more complicated or open-ended topics, where there may not be a definitive answer).
30. An Eligible Provider must be capable of providing up-to-date information, for instance relating to the news, and must be able to provide responses by searching the web. This does not mean they must always search the web for every query or every use case. Nor does it mean they must have their own search index or search infrastructure; they could, for example, use a syndicated search index.
31. Furthermore, Eligible Providers must ensure that any generative AI summary responses are configured and operated in such a way as to ensure that web content is attributed clearly, accurately, and that end Users are provided with a clear means to access that web content. There are a wide range of ways such attribution may be achieved and each Eligible Provider should be able to determine its preferred approach.
32. For many queries there will be a multitude of ways for a service to 'adequately address' them. While every search service is capable of errors, an Eligible Providers' error rate must not be significant.
33. Given the above, the clear, fair, robust and transparent process for assessing services must test the way each service responds to a range of queries

across use cases and subjects. It must be capable of being replicated across services and Relevant Access Points.

34. The process would need to incorporate different ways that Users could interact with services. For example, in respect of a navigational use case, adding the word 'link' to queries may result in it returning links to websites when it otherwise might not.

Criterion 2

35. The second criterion (paragraph 1.f.ii. of the conduct requirement) is intended to ensure that Eligible Providers are able to provide a functioning general search experience on the Relevant Access Points.
36. We expect a 'functioning general search experience' to mean the Eligible Provider can work at a technical level on each Relevant Access Point without, for example, the device crashing or returning error messages to Users. We anticipate Eligible Providers will need to have and maintain ongoing compatibility with Android, so Google is expected to make available to Eligible Providers the necessary APIs or technical specifications to facilitate this.
37. As part of providing a functioning general search experience, Eligible Providers should meet minimum security requirements. These should be specified by Google, and will necessarily need to evolve over time.
38. In order to provide a functioning general search experience, we also expect Eligible Providers to confirm they have the ability (or credible plans) to deliver on an enduring basis including with a potentially growing user base.
39. Each service should be sufficiently distinct at a technical level to other services owned by the same provider that are on (or seeking to be on) the Search Choice Screen.

Criterion 3

40. The third criterion (paragraph 1.f.iii. of the conduct requirement) is intended to capture whether Users of a service consider it to be providing a general search service and/or whether they use it as such in practice.
41. Evidence for meeting this criterion could be attitudinal or behavioural. If a service can show that Users are, in practice, using it as a general search service (eg for the use cases set out in relation to the first criterion) then that would indicate they consider it, implicitly, to be a general search service.

42. We consider that a ‘significant proportion’ means a meaningful or non-trivial proportion. It does not mean a majority.

Device-Level Default Setting and Browser Default Setting

43. Pursuant to paragraphs 13 and 14 of the conduct requirement, Google is required to provide Users with a Device-Level Default Setting on Relevant Devices. We expect Google to retain the existing User journey to change default settings across access points and create a Device-Level Default Setting that should, for example, mirror the default browser setting that is present on Android Devices.
44. To support Users’ ability to switch easily, the CMA considers that Google should enable effective search terms such as ‘default’ and ‘default search’ to make these settings easily discoverable on Relevant Devices.
45. Paragraph 15 requires Google to provide Users with a means to access a full list of Eligible Providers where they are not available to choose from the Browser Default Setting or the Device-Level Default Setting. By way of example, where the Device-Level Default Setting only shows options based on downloaded applications, this could be achieved by linking to a list in the Google Play Store or via an alternative pathway from which the chosen Eligible Provider could be downloaded. This obligation does not prevent Google from also showing non-Eligible Providers in the Browser Default Setting or the Device-Level Default Setting.

Eligible Provider APIs and settings access

46. The APIs Google is required to provide pursuant to paragraphs 16 and 17 of the conduct requirement could be provided on a similar basis to the API provided in the context of browsers on Android Devices.¹³
47. Users will likely need to provide their consent for this information to be shared with Eligible Providers and could be asked as part of the set-up process or installation.

Prompts

48. Google may use Prompts or pop-ups to notify Users of changes to their default search settings, for example to protect Users from a situation where

¹³ See [Mobile Browsers and Cloud Gaming market investigation Working Paper 5](#), 5 July 2024, paragraphs 4.60-4.62.

they may be unaware of those changes. However, any such notifications should not ask Users if they want to switch to Google Search (or any other Google search product).

4. Effectiveness of the User Choice CR

- 4.1 This section explains why we consider our revised proposal for the User Choice CR will be effective in achieving the aim set out at paragraph 2.1 above. It takes each aspect of the proposed CR in turn and summarises:
- (a) our proposed approach, as set out in the January 2026 consultation;
 - (b) the responses we received to the January 2026 consultation (from Google and third-party stakeholders);
 - (c) where relevant, the findings of the qualitative research we commissioned to explore consumer needs and requirements in relation to choice screens displaying options for services they use for search (the **User Research**);¹⁴ and
 - (d) our current proposed approach, including any changes made to the proposed CR, taking into account the responses to the January 2026 consultation, the User Research and any other relevant evidence.¹⁵

Eligibility criteria

Our proposed approach in the January 2026 consultation

- 4.2 We proposed that the eligibility criteria should allow a broad range of competing providers to appear on the choice screen where they can fulfil end users' search needs, particularly as search offerings and user expectations and behaviour evolve. Ensuring a broad and compelling range of search offerings would promote consumers' engagement in their choice of search provider, helping to ensure the proposed CR is effective in meeting its aim.
- 4.3 We therefore proposed the following eligibility criteria:
- (a) An Eligible Provider must:
 - (i) Adequately address the full range of use cases of a general search engine on a wide range of subjects by searching the web (**Criterion 1**).

¹⁴ Thinks (2026) [User research on choice screens in search](#), pages 3 to 4.

¹⁵ In addition to the substantive changes to the proposed User Choice CR and interpretative notes identified below, the CMA has also made a small number of minor changes for consistency and clarity.

- (ii) Provide the expected general search experience for affected search access points (**Criterion 2**).
- (iii) Be considered by a significant proportion of UK users to provide a general search service (**Criterion 3**).
- (iv) Be operated and marketed with general search as a core and central part of the service (**Criterion 4**).

Summary of responses

4.4 In its response to the January 2026 consultation and subsequent submissions Google agreed with the proposed eligibility criteria.¹⁶ More specifically, Google stated that, in its view:

- (a) for Criterion 1, there were currently at least nine use cases that should be part of the ‘full range’;¹⁷
- (b) Criterion 2 should take into account expectations as to how each access point should function from a range of stakeholders (users, OEMs, publishers, search engines) and studies could be conducted to understand those expectations for each access point;¹⁸
- (c) Criterion 4 would ensure that general search is not merely a subsidiary component of a service and avoid ‘free riding’ on the Search Choice Screen by incorporating a small general search component.¹⁹

4.5 Google also set out a number of questions it considered would be probative for assessing whether services met each of the criteria.²⁰

4.6 We received a number of third-party responses to the January 2026 consultation on how ‘wide’ the eligibility criteria should be in terms of the types of services, or their underpinning technologies, that could meet them. Several respondents supported the proposal for eligibility criteria that were wider than

¹⁶ See, for example, Google’s response to the CMA’s consultation on proposed search conduct requirements, February 2026, paragraphs 82 and 91.

¹⁷ Navigational queries, transactional queries, location-based queries, conducting research, learning about the news, finding out other real-time information, image search, validation and accuracy checks and looking to explore options without a definitive answer (see Google submission to the CMA).

¹⁸ Google submission to the CMA.

¹⁹ Google submission to the CMA.

²⁰ Google submission to the CMA.

existing choice screens,²¹ including on the basis of changing user expectations and behaviour.²²

4.7 OpenAI argued that the proposed criteria were not sufficiently forward-looking to capture the evolution of users' search habits and that Google's own search service uses an AI interface and AI models.²³

4.8 Several respondents opposed the inclusion of AI services:

- (a) two argued that they would not meet elements of the criteria, including two stakeholders suggesting that they do not deliver the key elements of an expected general search service (eg navigational queries);²⁴ and
- (b) four respondents argued that the CMA's decision to exclude Gemini from the search SMS designation means that AI services should not be part of the Search Choice Screen.²⁵

4.9 Which? and OpenAI submitted that the criteria were too open to interpretation, with imprecise or discretionary language.²⁶ We also received specific comments on the clarity of individual criteria:

- (a) **Criterion 1:** Which? suggested making 'full range of use cases' clearer;²⁷
- (b) **Criterion 2:** Shaping Competition in the Digital Age suggested that 'stakeholder expectations' required clarification;²⁸
- (c) **Criterion 3:** Shaping Competition in the Digital Age and Which? both suggested 'significant proportion of UK users' required clarification.²⁹

²¹ Responses to the CMA's consultation on proposed User Choice CR: Which, page 3; Chamber of Progress, page 4; Microsoft, page 2; Platform Leaders, page 1; Trainline, page 15; Vivaldi, page 1.

²² Responses to the CMA's consultation on proposed User Choice CR: Which, page 3; Chamber of Progress, page 4; Microsoft, page 2; Platform Leaders, page 1.

²³ Response to the CMA's consultation on proposed User Choice CR: OpenAI, pages 1 to 2.

²⁴ Responses to the CMA's consultation on proposed User Choice CR: Anonymous 10, page 1; Professional Publishers Association, pages 11 to 12.

²⁵ Responses to the CMA's consultation on proposed User Choice CR: Guardian Media Group, page 12; Computer and Communications Industry Association, page 2; Professional Publishers Association, page 11; News Media Association, page 1.

²⁶ Responses to the CMA's consultation on proposed User Choice CR: OpenAI, pages 1 to 2; Which?, pages 3 to 4.

²⁷ Response to the CMA's consultation on proposed User Choice CR: Which?, page 3.

²⁸ Response to the CMA's consultation on proposed User Choice CR: Shaping Competition in the Digital Age, page 16.

²⁹ Responses to the CMA's consultation on proposed User Choice CR: Shaping Competition in the Digital Age, page 16; Which?, page 3.

Shaping Competition in the Digital Age and Mozilla raised a concern that it risks excluding smaller and emerging providers;³⁰ and

- (d) **Criterion 4:** Which? noted that this assessment required 'considerable judgement' and Platform Leaders noted that AI assistants (which it said will need to be captured) are not marketed as search engines.³¹

- 4.10 The Computer and Communications Industry Association raised concerns that expanded eligibility criteria could include companies that may undermine users' trust and suggested that the eligibility criteria should refer to security and privacy concerns.³²
- 4.11 Two respondents also suggested the choice screen should have only one search service per corporate group.³³

User Research

- 4.12 The User Research considered how users responded to the presence of AI-based services on the choice screen. However, it did not seek to define what services should or should not be eligible for a search choice screen.³⁴ It found that many users reported viewing generative AI-based services as different to traditional search services, but that they increasingly used them for search. When users noticed generative AI-based services on the choice screen, they tended to engage more with the list of options.³⁵

Our current proposed approach

- 4.13 Having considered the responses to the January 2026 consultation, the User Research and other evidence, we have amended the proposed eligibility criteria and proposed further explanations of them in the interpretative notes.

³⁰ Responses to the CMA's consultation on proposed User Choice CR: Shaping Competition in the Digital Age, page 16; Mozilla, page 3.

³¹ Responses to the CMA's consultation on proposed User Choice CR: Which, page 3; Platform Leaders, page 1.

³² Responses to the CMA's consultation on proposed User Choice CR: Computer and Communications Industry Association, pages 1 to 2.

³³ Responses to the CMA's consultation on proposed User Choice CR: DuckDuckGo, page 2; Anonymous 10, page 2.

³⁴ Participants in both the guided and the self-guided user tests were recruited to ensure a spread of demographic characteristics including age, gender and ethnicity. Participants in the guided tests were also recruited to ensure a spread of self-reported engagement with generative AI-based services, as well as their confidence to carry out digital tasks (eg paying bills, booking appointments, updating device software). This was not replicated in the self-guided tests as users on the platform skewed towards higher digital confidence. See User Research, page 15.

³⁵ User Research, pages 39 to 42.

This is to ensure they support the effectiveness of the proposed CR by focusing on end users' needs, security and being technology neutral, which recognises the evolution in the types of services, including AI assistants, that users are using for search. The specific changes are explained further below, taking each criterion in turn.

- 4.14 The line between 'AI-based services' and other types of search service is increasingly blurred (which the User Research has observed). Google Search, as well as many other 'traditional' search services, incorporate AI models and offer AI interfaces or generative AI summaries in response to queries. We therefore do not consider that because a service has an AI component or interface it should be excluded from the choice screen. Given the developments we are seeing in the market, provided they meet the eligibility criteria, AI assistants could in theory be able to be listed on the choice screen.
- 4.15 This is consistent with our position in the SMS Final Decision. In particular, we do not agree with arguments that, since we decided in the SMS Final Decision that Google's Gemini AI assistant was not, at that time, within the scope of the relevant digital activity, it would be inconsistent to allow 'AI assistants' to be eligible. That analysis was based on Google's products and commercial decisions, not an assessment of the sector as a whole³⁶ and we recognised AI assistants as an emerging competitive threat to Google's general search service in the SMS Final Decision.³⁷

*Criterion 1 – Adequately address the full range of use cases of a general search **service** on a wide range of subjects, **including** by searching the web*

- 4.16 We consider that 'search service' is more consistent with the drafting across the rest of the proposed User Choice CR and more forward-looking. It reflects a wider range of offerings in the search sector and the way Google itself is evolving, for example through the inclusion of AI Overviews and AI Mode.
- 4.17 We have also proposed adding '*including* by searching the web' to reflect the fact that search services often have multiple sources contributing to the responses they provide, for example data feeds and AI models.³⁸ An Eligible

³⁶ See, for example, CMA194, paragraph 2.10.

³⁷ See, for example, [Strategic Market Status investigation into Google's general search services: Final Decision](#), 10 October 2025, paragraph 5.65.

³⁸ [Strategic Market Status investigation into Google's general search services: Final Decision](#), 10 October 2025, paragraph 4.14(a).

Provider must be able to search the web (including through a syndication agreement), but it can also address use cases through other means.

4.18 We have also added clarification to the proposed interpretative notes. In particular, we have:

- (a) set out the current ‘full range of use cases’,³⁹ which builds on the consumer research undertaken as part of the SMS investigation and submissions from Google.⁴⁰ We will keep this list under review in order to appropriately capture users’ expectations for, or engagement with, general search services;
- (b) clarified that we consider it important that web content is clearly and accurately attributed in any generative AI summary response, so that users are able to access that content to find additional information and verify the responses given. We recognise that the particular way in which services enable this may vary; Eligible Providers are not required to take the same approach as Google;⁴¹ and
- (c) clarified how we would expect Google to approach assessing certain other elements of the criterion.

*Criterion 2 – Provide a **functioning** general search experience for **relevant** search access points.*

4.19 We propose to amend Criterion 2 to focus on whether a ‘*functioning*’ service is provided on the relevant access points rather than the ‘expected’ experience. This is in light of feedback to the consultation that ‘stakeholder expectations’ was unclear, as well as Google’s interpretation that it would incorporate a range of stakeholders’ expectations. We do not think it is practicable to seek to bring together the expectations of multiple groups of stakeholders in a transparent and robust way as part of the eligibility criteria. We think the needs of different groups of stakeholders – including as expressed in response to the January 2026 consultation – are reflected in the updated proposed eligibility criteria.

³⁹ Online navigational, transactional, simple informational and complex informational queries.

⁴⁰ [Strategic Market Status investigation into Google’s general search services: Final Decision](#), 10 October 2025, footnote 374.

⁴¹ See, for example, [Publisher CR: Final Decision](#), 3 June 2026, paragraph 3.43.

- 4.20 We have also clarified in the proposed interpretative notes that ‘*functioning*’ service means that the service works at a technical level and does not give rise to a poor user experience.
- 4.21 We have also updated the interpretative notes to reflect consultation feedback on the importance of security, particularly in relation to user data. As part of providing a functioning general search experience, eligible services should therefore meet minimum security standards to protect users and their devices. These standards will inevitably need to evolve over time and we consider Google may be best placed to specify the detail of these as part of implementation of the CR. However, we envisage they would require the service to ensure ongoing compatibility with Android, facilitate the secure transport and storage of user queries and data, and not interfere with wider features on the device, without seeking user consent. We do not propose to refer to user privacy given there is a separate regulatory regime firms would be expected to comply with.
- 4.22 While we do not agree with the suggestion that each firm or corporate group should be limited to a single service on the Search Choice Screen, we have clarified in the proposed interpretative notes that each service provided by the same firm or corporate group should be sufficiently distinct to avoid the risk that users get a choice set with multiple functionally identical services, which we consider could undermine the effectiveness of the Search Choice Screen.
- 4.23 We have also clarified in the proposed interpretative notes that Eligible Providers must confirm they have the ability (or credible plans) to deliver on an enduring basis, given the need for them to continue to deliver their service.
- 4.24 Finally, the inclusion of ‘*relevant*’ rather than ‘*affected*’ better aligns the criterion with other definitions used in the proposed CR.

Criterion 3 – Be considered by a significant proportion of UK users of the service to provide a general search service

- 4.25 We have amended this proposed criterion to make clear that it applies to the ‘UK users *of the service*’, rather than all ‘UK users’, and explained this in the proposed associated interpretative notes. We consider that this amended criterion provides some reassurance that the service has a track record in providing a general search service.
- 4.26 We also explain in the proposed interpretative notes that providers’ evidence to demonstrate that they meet this criterion can be attitudinal (eg surveys of users) or behavioural (eg how users are using the service in practice).

- 4.27 We have also provided an explanation of how we interpret a ‘significant proportion’ in the proposed interpretative notes. We consider that it involves a meaningful or non-trivial proportion of users but does not require a majority and does not involve setting a specific threshold.

Deletion of Criterion 4 (Be operated and marketed with general search as a core and central part of the service)

- 4.28 We propose to delete Criterion 4 on the basis that:
- (a) it is not sufficiently forward-looking, since the ongoing evolution of general search, as illustrated, for example, by the changes Google has made to its own service, has made it increasingly hard to specify what this criterion would mean;
 - (b) it gives rise to a risk of sub-optimal outcomes, for example excluding a service that dealt with a large number of queries across the use cases, but an even larger number of non-search queries;
 - (c) our focus on end users means that we do not consider Google’s concerns about ‘free-riding’ are a relevant consideration; and
 - (d) the assessment of this criterion is likely to significantly overlap with Criterion 1.

Process for applying the criteria and admitting eligible search providers

Our proposed approach in the January 2026 consultation

- 4.29 We noted that Google currently determines the providers included on the Android Choice Screen and the DMA Choice Screen and provisionally proposed adopting the same approach. We sought views on this process, including what role, if any, the CMA ought to play.

Summary of responses

- 4.30 Google outlined the approach its Android team undertakes when assessing applications for the current UK search choice screen and proposed to adopt a similar process for potential new choice screens in the UK.⁴²

⁴² Google submission to the CMA.

- 4.31 We received a range of views from third parties. One OEM submitted that Google should apply the eligibility criteria, provided that its assessment is transparent, reasonable and objectively justified.⁴³ Several respondents noted the importance of the CMA having oversight of, and ability to intervene in, eligibility decisions,⁴⁴ including to mitigate the risk of Google applying the criteria too restrictively⁴⁵ and to uphold predictability and avoid ambiguity.⁴⁶ Another respondent argued that the CMA should interpret these requirements and decide on applications, not Google.⁴⁷

Our current proposed approach

- 4.32 Having considered the responses to the January 2026 consultation, we understand the concerns raised about Google applying the criteria and the importance of a clear, transparent and fair process. We also recognise the experience and expertise Google has in running similar processes for existing choice screens.
- 4.33 We have therefore included more explicit procedural requirements that Google must follow when running the application process and determining eligibility at paragraph 12 of the proposed User Choice CR and paragraphs 26-28 of the proposed interpretative notes. These requirements will ensure that Google runs the process fairly, will provide greater transparency to potential applicants and will give greater confidence in the decision-making process, supporting the effectiveness of the proposed CR. The additional clarity and the obligations to report to the CMA will also allow us to monitor how Google is running the process and applying the eligibility criteria.
- 4.34 The proposed CR contains an obligation to give two weeks' advanced notice before opening the application window, then an overall timeframe of two months from the start of the application window to written confirmation of Google's decision. We consider this period to be reasonable to allow applicants to prepare their submissions and for Google to assess and take decisions.

⁴³ Response to the CMA's consultation on proposed User Choice CR: Samsung, page 2.

⁴⁴ Responses to the CMA's consultation on proposed User Choice CR: Anonymous 10, page 2; Mozilla, page 4; Platform Leaders, page 1; Shaping Competition in the Digital Age, page 17; Which?, page 4.

⁴⁵ Response to the CMA's consultation on proposed User Choice CR: Platform Leaders, page 1.

⁴⁶ Response to the CMA's consultation on proposed User Choice CR: Shaping Competition in the Digital Age, page 17.

⁴⁷ Response to the CMA's consultation on proposed User Choice CR: Knight-Georgetown Institute, pages 9 to 10.

Coverage of devices

Our proposed approach in the January 2026 consultation

- 4.35 We proposed to increase the coverage of choice screens so that the Search Choice Screen would be displayed on:
- (a) all Android devices where Google Search is pre-installed and set as a default in factory set-up by OEMs (in relation to the search widget and Chrome app); and
 - (b) Chrome on desktop and iOS devices⁴⁸ where Google Search has been preinstalled and/or set as default on that browser.
- 4.36 We considered that this expanded coverage would improve users' ability to exercise effective choices across more relevant Google-owned access points.

Summary of responses

- 4.37 Google was supportive of our proposed scope to expand coverage to Chrome on desktop and iOS devices and include Pixel devices.⁴⁹
- 4.38 A few third-party respondents were also supportive of expanding the coverage of choice in this way.⁵⁰ Only one stakeholder argued that extending the choice screen to cover Chrome on desktop and iOS devices would be excessive.⁵¹
- 4.39 However, a few stakeholders submitted that the exclusion of certain access points (eg circle to search on Android devices) would limit the effectiveness of the choice screen.⁵²

Our current proposed approach

- 4.40 In light of the responses to our consultation, we continue to consider that extending the choice screen to cover Chrome on desktop devices (Windows

⁴⁸ In this consultation document, references to iOS devices shall include iPadOS devices.

⁴⁹ Google's response to the CMA's consultation on proposed search conduct requirements, February 2026, February 2026, paragraph 90.

⁵⁰ Responses to the CMA's consultation on proposed User Choice CR: Which?, page 2; Sony, page 1; Trainline, page 15.

⁵¹ Response to the CMA's consultation on proposed User Choice CR: Computer and Communications Industry Association, page 1.

⁵² Responses to the CMA's consultation on proposed User Choice CR: DuckDuckGo, page 8; Microsoft, page 1; OpenAI, pages 4 to 5.

and MacOS) and iOS devices will improve users' ability to exercise effective choices.

- 4.41 We also consider that our proposed coverage captures the most important Google-owned access points through which the largest share of searches are conducted.⁵³ The CMA would monitor the shares of searches conducted through other access points to ensure that this scope remained effective.

Frequency of display and timing

Our proposed approach in the January 2026 consultation

- 4.42 We proposed that Google should display the Search Choice Screen at initial set-up of Android devices and Chrome on desktop and iOS devices and redisplay the Search Choice Screen on an annual basis to existing users of relevant browsers and devices.
- 4.43 We proposed that redisplay should occur at a fixed point each year or after major updates to enable providers to plan marketing campaigns and that there should be an exception for redisplay where a user has seen the Search Choice Screen in the preceding six months.
- 4.44 We also proposed that users should be able to access the Search Choice Screen from their default settings at any time. We considered this would increase users' exposure to choice screens allowing them to make ongoing, active choices and respond to new trends in search.

Summary of responses

- 4.45 Google submitted that annual redisplay was unnecessary, because its proposed 'UK Choice Package' was less onerous but would still promote choice for UK consumers and visibility for search engines.⁵⁴
- 4.46 Google submitted that any obligation to show a Search Choice Screen (including the annual redisplay) should apply to all devices and browsers

⁵³ See CMA consultation on proposed User Choice CR, paragraphs 4.17 to 4.18.

⁵⁴ Google's proposed 'UK Choice Package' includes the following: the central switch for search providers on Android, the Android default prompting API, a longer list of search providers in the choice screen, a stratified randomization 5+7 approach that promotes the ability for new entrants to participate, the information screen and updated eligibility criteria (Google's response to the CMA's RFI). Google submission to the CMA.

where Google was default out of the box, irrespective of the current default search provider on those devices or browsers.⁵⁵

4.47 In addition to arguments on proportionality (which we consider further in section 5 below), Google also raised concerns that the annual redisplay proposal would:

- (a) impact end users' experience by creating repeated and potentially frequent interruptions and disrupting end users' ongoing tasks;⁵⁶ taking place when users do not want to be interrupted (as compared to set-up);⁵⁷ and creating choice overload and increasing the risk of rushed decisions.⁵⁸ It also stated that allowing the Search Choice Screen to be resurfaced from central default search settings is likely to lead to confusion;⁵⁹
- (b) diminish in effectiveness over time as end-user preferences are actively confirmed at device set-up, with subsequent, interruptive displays treated with automaticity;⁶⁰ and
- (c) raise technical implementation challenges as whilst there were potentially some pathways for implementation, they would need to be significantly modified or developed (including by OEMs) and some were untested or limited in terms of application.⁶¹ Google also explained it has greater control of pre-UK market devices than existing Android devices (apart from Pixel) with updates for existing Android devices requiring OEMs' input.⁶² Google also submitted that it could not reliably implement an exemption from redisplay because it cannot identify devices set up in the previous six months or track proactive user-initiated default switches.⁶³

⁵⁵ Google submission to the CMA.

⁵⁶ Google's response to the CMA's consultation on proposed search conduct requirements, February 2026, paragraphs 107-112.

⁵⁷ Google's response to the CMA's consultation on proposed search conduct requirements, February 2026, paragraph 112.

⁵⁸ Google submission to the CMA.

⁵⁹ Google's response to the CMA's consultation on proposed search conduct requirements, February 2026, paragraph 99.

⁶⁰ Google submission to the CMA.

⁶¹ The potential pathways include the [X], [X] and [X] and the pathway which it currently uses to display choice screens (see Google response to the CMA's RFI). See also Google submission to the CMA.

⁶² Google explained that certain changes to the relevant components in the existing devices' system partition in the factory would need to be carried out and tested to ensure that it functions as intended (see Google's response to the CMA's RFI).

⁶³ Google's response to the CMA's consultation on proposed search conduct requirements, February 2026, paragraph 113.

- 4.48 A range of third parties supported the redisplay proposal, indicating that it would provide greater opportunities for users to engage with their choice and to keep up with innovation, mitigate inertia and help competitors market effectively.⁶⁴ Responses also identified the following:
- (a) several respondents noted the risk of user frustration or fatigue.⁶⁵ Trainline noted that user fatigue concerns should be viewed in the context of Google's wider use of prompts;⁶⁶
 - (b) OEMs generally indicated that implementation should be through Google-managed components not device-side changes,⁶⁷ although they stated that they needed further information before determining whether device-side changes would be necessary,⁶⁸ with two noting that limited device-side configuration, coordination, testing or validation may still be necessary;⁶⁹ and
 - (c) a few stakeholders supported search providers receiving advanced notice of the redisplay date.⁷⁰ A respondent suggested that an annual choice screen day or fixed window would increase predictability for competitors and facilitate consumer awareness.⁷¹

User Research

- 4.49 The User Research found that users need clear context and information when they are prompted to make a choice outside device set up to avoid potential confusion. Some users indicated a preference for the option to delay or skip the choice screen when the prompt interrupted a time-sensitive task.⁷²

⁶⁴ Responses to the CMA's consultation on proposed User Choice CR: Brave Software, page 1; DuckDuckGo, page 4; Mozilla, page 4-5; Platform Leaders, page 1; Shaping Competition in the Digital Age, page 17; Trainline, pages 15 to 16; Vivaldi, page 1; Which?, page 4.

⁶⁵ Responses to the CMA's consultation on proposed User Choice CR: Samsung, pages 2-3; Sony, page 2; Chamber of Progress, pages 5-6; Competition and Communications Industry Association, pages 2 to 3, International Center for Law & Economics, page 15.

⁶⁶ Response to the CMA's consultation on proposed User Choice CR: Trainline, page 16.

⁶⁷ Responses to the CMA's RFI: [REDACTED]; [REDACTED]; and [REDACTED].

⁶⁸ Responses to the CMA's RFI: [REDACTED]; [REDACTED]; and [REDACTED].

⁶⁹ Responses to the CMA's RFI: [REDACTED]; and [REDACTED].

⁷⁰ Responses to the CMA's consultation on proposed User Choice CR: Brave, page 1; DuckDuckGo, page 4; Trainline, page 16.

⁷¹ Responses to the CMA's consultation on proposed User Choice CR: Brave, page 1.

⁷² User Research, pages 43 to 45.

Our current proposed approach

- 4.50 In relation to the initial display of the Search Choice Screen, we continue to expect each new Android Device to see a Search Choice Screen as part of the set up process. However, to ensure that it is effective, we have amended the proposed CR to clarify that, for Chrome on desktops and iOS devices, Google would be required to:
- (a) display a non-skippable Search Choice Screen connected with the first major update to Chrome after the User Choice CR comes into force; and
 - (b) show a non-skippable Search Choice Screen on set up or first use of any new Chrome applications that are downloaded or installed after the date of that major update.
- 4.51 This would immediately provide existing Chrome users (who have not seen a choice screen to date) and new Chrome users with the opportunity to engage with their default search providers as early as possible.
- 4.52 In relation to the redisplay of the Search Choice Screen, we do not agree that Google's 'UK Choice Package' would be effective, because it would only prompt users to consider their options once, so does not allow for a user's preference to change over time, which is particularly relevant given the evolving nature of search.
- 4.53 We do not consider that a short prompt is too onerous for users (where they are already familiar with regular prompts, including from Google on Chrome and other apps). However, we recognise the potential negative user experiences from non-skippable prompts. We therefore propose that the annual redisplay notification should be skippable and visually limited so users can dismiss it if they do not want to engage. We consider this provides users with the option to make an active choice annually while reducing the risks of disruption or frustration, thereby ensuring the proposed CR is effective. This approach is also supported by the User Research.
- 4.54 We also recognise the technical complexities associated with implementing the redisplay proposal on existing Android devices. We therefore propose that the redisplay obligation is limited to new (pre-market) Android UK devices. This still ensures that, over time, an increasing number of Android devices would see the Search Choice Screen notification. Since these technical concerns are limited to Android devices, we propose the obligation applies to all Chrome browsers on desktop and iOS devices, not just new ones.

- 4.55 Given these proposed changes, we consider that the frequency of the redisplayed Search Choice Screen ought to remain annual, because it will allow users to periodically engage with new innovative search services. However, rather than set a specific date on which it will take place, we propose that each year it would be linked to major Android and/or Chrome updates. This would ensure that users are not being interrupted from a separate task when they are shown the prompt.
- 4.56 Google will be expected to communicate the timing of the choice screen transparently to other Eligible Providers so that they can make plans; for example, to enable them to time marketing campaigns accordingly.
- 4.57 We recognise the current technical limitations Google has raised in relation to being able to avoid redisplaying the Search Choice Screen where the user has seen it in the preceding six months. We consider that the risk to the user experience of seeing the Search Choice Screen again in a short time frame is addressed, in large part, by making it skippable. In case Google identifies a technical solution, the proposed CR still contains the six-month exemption for the redisplay, which we have expanded to also include a user deliberately changing their default search provider generally.
- 4.58 In light of the submissions we received, we propose to remove the obligation to allow users to re-trigger the Search Choice Screen from the default search settings. We recognise the impact on user experience and technical complexity of this proposal and we consider that the changes we have made to the redisplay requirement, as well as the package of other measures, mean that this obligation is not necessary for the User Choice CR to be effective. This change will not remove the ability of users manually to change their search provider in the default search settings.
- 4.59 We have also clarified the definitions of ‘Relevant Browser’ and ‘Relevant Device’, so they are based on whether Google Search is pre-installed or set as the default from the outset by Google or the OEM, not whether the user has selected Google as their default search provider subsequently. This ensures that users will be given the same opportunities to engage with their search provider regardless of which provider they have selected previously.

‘Test-drive’ function

Our proposed approach in the January 2026 consultation

- 4.60 We consulted on a requirement for the Search Choice Screen to include an option to ‘test-drive’ a search provider for a short, defined period, following

which users could either confirm they are happy with their default search service or select an alternative (either on a further ‘test-drive’ or as their ongoing default provider).

- 4.61 We considered the ‘test-drive’ option would improve consumers’ awareness of a broad range of search providers and confidence in their choice of search provider, thereby improving the effectiveness of the Search Choice Screen by supporting consumers’ choices and driving competition.

Summary of responses

- 4.62 Google submitted that the ‘test-drive’ feature is unnecessary, because its ‘UK Choice Package’ (see paragraph 4.45) enables users to try any service provider at their convenience through the settings.⁷³
- 4.63 In addition to arguments on proportionality (which we consider further in section 5 below) Google also raised the following concerns:
- (a) users may face frustration and time cost, including a resumption lag, when they are interrupted from their tasks through a blocking and interruptive ‘test-drive’ pop-up⁷⁴ and that the presence of a ‘test-drive’ button on the Search Choice Screen could cause users to perceive the ‘set as default’ option as irreversible, high-stakes or risky;⁷⁵ and
 - (b) as with annual redisplay (see paragraph 4.47(c)), Google submitted that there are potential implementation pathways, but it has limited control in relation to existing devices (apart from Pixel devices). It also raised risks of ‘broken’ user experiences, for example where the user changes their default search provider during the ‘test-drive’ period.⁷⁶
- 4.64 Many stakeholders supported the ‘test-drive’ proposal,⁷⁷ noting that it could encourage users to try other search providers,⁷⁸ increase confidence in

⁷³ Google’s response to the CMA’s RFI; Google submission to the CMA.

⁷⁴ Google submission to the CMA.

⁷⁵ Google’s response to the CMA’s consultation on proposed search conduct requirements, February 2026, paragraph 127.

⁷⁶ Google’s response to the CMA’s RFI.

⁷⁷ Responses to the CMA’s consultation on proposed User Choice CR: DuckDuckGo, page 6; Knight-Georgetown Institute, page 9; Mozilla, page 7; Platform Leaders, page 2; Shaping Competition in the Digital Age, page 18; Sony, page 3; Trainline, page 16; Vivaldi, page 1; Which?, page 5.

⁷⁸ Responses to the CMA’s consultation on proposed User Choice CR: Platform Leaders, page 2; Which?, page 5.

choices,⁷⁹ make users more informed,⁸⁰ and reduce inertia.⁸¹ However, one stakeholder argued that it could create UK-specific engineering requirements and may be of limited value to competitors.⁸²

4.65 Responses also commented on the following:

- (a) a few stakeholders supported user testing and research to inform the design and implementation of the ‘test-drive’ function;⁸³
- (b) two stakeholders considered two weeks to be an appropriate duration,⁸⁴ while another favoured four weeks to give users time to feel comfortable with an alternative search service;⁸⁵ and
- (c) OEMs generally indicated that a Google-led approach would be preferable.⁸⁶ While two OEMs needed further detail to assess whether device-side changes would be required,⁸⁷ another considered that implementation could primarily be delivered through Google-managed systems.⁸⁸

User Research

4.66 The User Research found that the ‘test-drive’ option enabled some users to pay greater attention to the options available to them and led to users choosing a wider range of services. Users like the low commitment and reversibility of their choice, which empowered them to try something new.⁸⁹

4.67 However, users often needed additional explanations of what it was and how it would affect their device. Once users reached a confirmation screen that provided further information about what a trial meant in practice, the impact of

⁷⁹ Response to the CMA’s consultation on proposed User Choice CR: Which?, page 5.

⁸⁰ Responses to the CMA’s consultation on proposed User Choice CR: Sony, page 3; Trainline, page 16.

⁸¹ Responses to the CMA’s consultation on proposed User Choice CR: Shaping Competition in the Digital Age, page 18; Trainline, page 16.

⁸² Response to the CMA’s consultation on proposed User Choice CR: Computer and Communications Industry Association, pages 3 to 4.

⁸³ Responses to the CMA’s consultation on proposed User Choice CR: Anonymous 10, page 3; Mozilla, page 7; Platform Leaders, page 2; Shaping Competition in the Digital Age, page 18.

⁸⁴ Responses to the CMA’s consultation on proposed User Choice CR: DuckDuckGo, page 6; Which?, page 5.

⁸⁵ Response to the CMA’s consultation on proposed User Choice CR: Anonymous 10, page 3.

⁸⁶ Responses to the CMA’s RFI: [X]; [X]; and [X].

⁸⁷ Responses to the CMA’s RFI: [X]; and [X].

⁸⁸ Response to the CMA’s RFI: [X].

⁸⁹ User Research, page 35.

a trial option became clear. Users typically found the confirmation screen reassuring in that it created a moment of positive friction.⁹⁰

Our current proposed approach

- 4.68 Based on the responses to the January 2026 consultation and the User Research, we still consider that the ‘test-drive’ option is an effective way to improve consumers’ awareness of a broad range of search providers and confidence in their choice of search provider, thereby achieving our aim.
- 4.69 Although Google submitted that their proposed ‘UK Choice Package’ meant the ‘test-drive’ option was not necessary, we consider that it serves a distinct purpose, because:
- (a) it is aligned with the moment users decide their default search provider through the Search Choice Screen. This gives those users an opportunity to discover providers they have not tried previously at a time they are actively considering this choice; and
 - (b) the User Research indicates that it empowers users to try an alternative option, especially new and emerging search providers.
- 4.70 However, based on the feedback received we have made changes to the ‘test-drive’ function in the proposed CR and interpretative notes.
- 4.71 To reduce interruptions for consumers we have:
- (a) provided that, after a user chooses the ‘test-drive’ option, they must be shown a confirmation screen that explains the consequences of that choice to address the risk that end users may not understand the difference is between ‘set as a default’ and ‘test-drive’ button, which was supported by the User Research;
 - (b) provided that the notification at the end of the ‘test-drive’ period should be skippable and visually limited so that users can continue the task at hand and dismiss the pop-up if they do not want to engage. We consider this ensures that end users can make an active choice while reducing the risk of disruption or frustration, thereby ensuring the proposed CR is effective; and

⁹⁰ User Research, pages 33 and 36.

- (c) retained the references in the proposed interpretative notes that Google may test which period might be best for users or allow users to set that period themselves. However, we have also indicated that we expect the period to be no shorter than a week (which would not be long enough for a user to get used to a new provider).⁹¹

4.72 Given the technical challenges in introducing this functionality to older devices, we have updated the proposed CR and interpretative notes to:

- (a) require the ‘test-drive’ option only for new Android devices (as well as all Chrome on desktop and iOS devices), for the same reasons as set out at paragraph 4.54 above in relation to redisplay of the Search Choice Screen;
- (b) allow the notification at the end of the ‘test-drive’ period to take the user to the relevant default search settings, rather than surfacing a Search Choice Screen, which addresses Google’s technical concerns, while still providing the end user with the opportunity to change away from the search provider they have been ‘test-driving’. While this means that an end user cannot conduct multiple ‘test drives’, we consider that the initial ‘test-drive’ period will be sufficient to allow users to discover new providers they have not used before and engage with their options; and
- (c) remove the obligation to show the notification at the end of the ‘test-drive’ period where the user has, during that period, deliberately changed their default search provider (eg via the default search settings).⁹²

Design of the Search Choice Screen

Our proposed approach in the January 2026 consultation

4.73 We proposed that Google should display a list of search provider options in a ‘stratified’ order, with the five most popular providers displayed in a random order, followed by an additional seven providers selected at random from the full list of Eligible Providers. We sought feedback on how the popularity of a search provider should be determined.

⁹¹ Search services can be viewed as experience goods, meaning that consumers likely benefit if they use them for a certain period of time to understand their preferences about that service. Allcott et al., (2025), [Sources of Market Power in Web Search: Evidence from a Field Experiment](#), NBER Working Paper Series

⁹² For the avoidance of doubt, we do not consider that cosmetic changes to the phone, such as deleting or moving a search widget or downloading a new search app, during the current or any previous period, amounts to a deliberate change in the default setting, so the prompt would still need to be shown.

- 4.74 We also proposed that users should easily be able to access a full list of Eligible Providers from the Search Choice Screen, so that they could access all Eligible Providers within the same choice moment.
- 4.75 We also proposed that Google show an information screen before the Search Choice Screen to inform users of the decision they will be required to make and the consequences of that decision.

Summary of responses

- 4.76 Google stated that it will engage with the CMA further on design specifications, such as the number and selection of providers and randomisation logic.⁹³ Google's proposed approach was a stratified randomization 5+7 approach that promotes the ability for new entrants to participate.⁹⁴ Google also supported the information screen.⁹⁵
- 4.77 Responses from third parties covered several key themes:
- (a) DuckDuckGo supported the inclusion of 12 options;⁹⁶ however, Samsung submitted that this may be too many, particularly if accompanied by descriptions.⁹⁷ Shaping Competition in the Digital Age submitted that the CMA should specify the number of options (suggesting between five and seven).⁹⁸
 - (b) A few respondents proposed that the full list of providers be randomised to ensure equal visibility of all providers instead of increasing awareness only of the largest ones.⁹⁹
 - (c) If there were more Eligible Providers than options on the choice screen, two respondents agreed with the proposed approach of the five most popular and then a random selection of others.¹⁰⁰

⁹³ Google's response to the CMA's consultation on proposed search conduct requirements, February 2026, paragraph 93.

⁹⁴ Google's response to the CMA's RFI.

⁹⁵ Google's response to the CMA's consultation on proposed search conduct requirements, February 2026, paragraph 92.

⁹⁶ Response to the CMA's consultation on proposed User Choice CR: DuckDuckGo, page 2.

⁹⁷ Response to the CMA's consultation on proposed User Choice CR: Samsung, page 2.

⁹⁸ Response to the CMA's consultation on proposed User Choice CR: Shaping Competition in the Digital Age, page 17.

⁹⁹ Responses to the CMA's consultation on proposed User Choice CR: DuckDuckGo, page 2; Mozilla, page 4.

¹⁰⁰ Response to the CMA's consultation on proposed User Choice CR: Mozilla, page 4; Anonymous 10, page 2.

- (d) DuckDuckGo told us that there should be a forced scroll to surface the full list of options.¹⁰¹
- (e) We received suggestions to use Cloudflare¹⁰² or user-driven indicators (eg UK user downloads or active selection/usage) not installations, which may reflect defaults and distribution agreements.¹⁰³
- (f) Several stakeholders were supportive and agreed that users would benefit from additional information through the information screen.¹⁰⁴

User Research

- 4.78 The User Research found information for users presented above the list of Eligible Providers was often skimmed or missed, as users' attention was typically drawn to logos and familiar brand names; this contributed to key information being overlooked. Users were also often surprised by the number of services available. Many were familiar with only two or three options and did not immediately recognise that the list extended further down the page. As a result, scrolling to review additional services was not consistently observed.¹⁰⁵
- 4.79 The information screen was very helpful for users and was associated with more deliberate progression into the choice and more engagement with the subsequent list of options, regardless of whether the information felt new.¹⁰⁶

Our current proposed approach

- 4.80 Having reviewed the January 2026 consultation responses and the User Research, we have made some amendments to the proposed CR and interpretative notes to ensure the effectiveness of the Search Choice Screen.
- 4.81 We have updated the proposed CR to make clear to always display all options on the Search Choice Screen, where the total number of Eligible Providers is

¹⁰¹ Response to the CMA's consultation on proposed User Choice CR: DuckDuckGo, page 2.

¹⁰² Response to the CMA's consultation on proposed User Choice CR: DuckDuckGo, page 7; Anonymous 10, page 2.

¹⁰³ Response to the CMA's consultation on proposed User Choice CR: Mozilla, page 4.

¹⁰⁴ Responses to the CMA's consultation on proposed User Choice CR: Computer and Communications Industry Association, page 3; Knight-Georgetown Institute, pages 10 to 11; Mozilla, page 6; Which?, page 4.

¹⁰⁵ User Research, pages 23 to 27.

¹⁰⁶ User Research, pages 29 to 32.

12 or less, which we consider provides users with sufficient number of options to choose from without overloading them.

- 4.82 If there are more than 12 Eligible Providers, the proposed CR now provides that the selection of who to show on the Search Choice Screen must be fair. We have clarified in the interpretative notes that we expect this to mean selecting the five most popular Eligible Providers, plus seven other Eligible Providers at random from the full list, which we consider would address the majority of users' expectations.
- 4.83 We recognise the difficulties of identifying a strong option to determine 'popularity', but we consider this concern will be resolved once the Search Choice Screen can be used to demonstrate popularity. We have therefore proposed that popularity should be based on Google Play Store downloads for the first six months, following which it should be based on the proportion of times each provider is selected when shown on the Search Choice Screen.
- 4.84 We recognise that this means a user may not be presented with their preferred choice. We therefore propose to retain the obligation to provide users with a means to access and choose from a list of Eligible Providers not included on a Search Choice Screen.
- 4.85 In relation to the ordering and ranking of the Search Choice Screen, we have updated the proposed CR to require Google to display providers in a fully randomised order. This approach will ensure that all options have the equal chance of being shown near the top for users to select from because the order that providers are presented strongly affects choice (eg lower positioned options are likely to be seen or chosen less frequently).¹⁰⁷
- 4.86 We have also proposed to require that all Search Choice Screens require users to scroll to see the full list of options to ensure user engagement with the choice-set, which was also supported by the User Research.
- 4.87 We have also maintained the information screen obligation, given the support from Google, third parties and the User Research.

¹⁰⁷ Mozilla, [Can browser choice screens be effective?: Experimental analysis of the impact of their design, content and placement \(2023\)](#), accessed by the CMA on 4 December 2025.

Device-Level Default Setting

Our proposed approach in the January 2026 consultation

- 4.88 We proposed that Google should be required to implement a centralised device-level default search setting for Android devices, which would allow users to select a single default search provider across multiple access points (the search widget and Chrome browser) at once whenever they wished. We considered that this would help to simplify the journey to switch the default search provider on Android devices and thereby help to meet our aim of enabling users to choose quickly and easily between search providers.

Summary of responses

- 4.89 Google responded that it is prepared to implement a central default search switch, which would be present in the settings menu of Android devices and allow users to select from a list of services already installed on the device. However, it would only affect the search widget. It submitted that also propagating to the Chrome application on the device would be confusing, since browsers already offer users the ability to switch search default.¹⁰⁸
- 4.90 A few third-party respondents were supportive of the proposal.¹⁰⁹ Mozilla responded that a device-level search setting that only applies to certain access points on Android devices risked being interpreted as a system-wide default, but supported our proposal that Google enable search terms such as default search in their device-level search default settings.¹¹⁰ The Computer and Communications Industry Association argued that users do not currently face an excessive burden in switching search defaults across access points and that adding a centralised setting risked confusing users.¹¹¹

Our current proposed approach

- 4.91 We propose to maintain the obligation on Google to implement a central default search setting on Android devices that will propagate to Chrome and the search widget. Given that default settings menus already exist on

¹⁰⁸ Google's response to the CMA's consultation on proposed search conduct requirements, February 2026, paragraphs 95-96.

¹⁰⁹ Responses to the CMA's consultation on proposed User Choice CR: Anonymous 10, page 3; Platform Leaders, page 2; Trainline, pages 16 to 17.

¹¹⁰ Response to the CMA's consultation on proposed User Choice CR: Mozilla, pages 7 to 8.

¹¹¹ Response to the CMA's consultation on proposed User Choice CR: Computer and Communications Industry Association, page 4.

Chrome, we do not believe that a similar setting for search providers will unduly confuse users and such concerns can be addressed by clearly explaining the consequences of the setting to users.

- 4.92 We have also retained the provision in the interpretative notes that Google should enable effective search terms such as ‘default’ and ‘default search’ to make these settings easily discoverable.

Search Default Setting APIs

Our proposed approach in the January 2026 consultation

- 4.93 We proposed that Eligible Providers be given an API that allowed them to see whether they are a user’s default search provider. We considered that this would improve search providers’ ability to effectively engage with users in relation to their default search settings.
- 4.94 We also included in the interpretative notes that Google could ensure that there were reasonable limits on how frequently the API can be accessed and how frequently users can be prompted, to ensure users retain positive experience and are not overloaded with prompts.

Summary of responses

- 4.95 Google submitted that it was willing to provide this capability for search services installed on Android devices and to prompt users in their apps to encourage them to set their app as the default.¹¹²
- 4.96 Google also responded that it would not limit in-app prompting, as prompts are a proportionate way to expose users to different search services and take place when users are likely to be engaging with their search choice.¹¹³
- 4.97 With regards to the proposed API, third parties provided the following responses:
- (a) One respondent argued that the proposal would significantly boost competition and should cover web usage,¹¹⁴ another was broadly

¹¹² Google’s response to the CMA’s consultation on proposed search conduct requirements, February 2026, paragraph 83.

¹¹³ Google’s response to the CMA’s consultation on proposed search conduct requirements, February 2026, paragraph 97.

¹¹⁴ Response to the CMA’s consultation on proposed User Choice CR: Anonymous 10, page 3.

supportive and noted that it should be available on equal terms to Google's own internal visibility.¹¹⁵ Two other respondents also provided positive responses to the API proposal.¹¹⁶

- (b) Sony opposed the introduction of an API on the basis of user privacy,¹¹⁷ two respondents highlighted the importance of protecting user privacy¹¹⁸ and two others stated that the API could be implemented in a secure manner.¹¹⁹
- (c) Two stakeholders argued that Google should also be required to permit deep-link URLs, which would allow third parties to direct users (from within their app or website) to the default search settings.¹²⁰

Our current proposed approach

- 4.98 We continue to propose that Google provide Eligible Providers with an API to determine if they are set as a user's default as an effective way to improve Eligible Providers' ability to engage with users on their default search settings.
- 4.99 We have expanded the proposed CR to also require Google to enable an Eligible Provider:
- (a) to take the user directly to the default search setting within Chrome where a user accesses its website via Chrome (on desktop, iOS device or Android device); and
 - (b) to take the user directly to the Default Device-Level Setting where the user opens an Eligible Provider's application on an Android device.
- 4.100 We consider the ability to take users directly to the default search setting (eg to allow deep linking) in addition to checking default status will make the search default API more effective as it enables Eligible Providers to prompt users to take action when they are using the Eligible Provider's search service.

¹¹⁵ Response to the CMA's consultation on proposed User Choice CR: Trainline, page 17.

¹¹⁶ Responses to the CMA's consultation on proposed User Choice CR: Mozilla, pages 8 to 9; Which?, page 5.

¹¹⁷ Response to the CMA's consultation on proposed User Choice CR: Sony, page 3.

¹¹⁸ Responses to the CMA's consultation on proposed User Choice CR: Samsung, page 4; Shaping Competition in the Digital Age, page 9.

¹¹⁹ Responses to the CMA's consultation on proposed User Choice CR: Anonymous 10, page 3; Platform Leaders, page 2.

¹²⁰ Responses to the CMA's consultation on proposed User Choice CR: DuckDuckGo, pages 7 to 8; Microsoft, page 2.

4.101 We agree that the search default settings API should not jeopardise users' privacy and could be provided on a similar basis to the API provided in the context of browsers on Android devices.¹²¹ In relation to a limit on in-app prompting, we agree with Google's proposed approach and have removed the reference from the interpretative notes.

Prompts

Our proposed approach in the January 2026 consultation

4.102 We proposed to require Google to ensure that its prompts to users are fair and balanced, which we considered necessary so as not to bias user choice.

Summary of responses

4.103 Google responded that it will continue to ensure that any prompts relating to search services are fair and balanced.¹²² It confirmed that it was also introducing an updated version of its 'search hijacking confirmation dialogue' which is 'fully neutral'.¹²³

4.104 A couple of responses were supportive of the proposal, noting that Google's use of an extension-based 'switch-back' prompt restricts competition and should be removed.¹²⁴ However, the Computer and Communications Industry Association submitted that expanding the eligibility criteria while reducing warnings could result in more privacy and security risks.¹²⁵

4.105 Responses suggested that the requirement should prevent leveraging of dark patterns,¹²⁶ adopt neutral choice architecture,¹²⁷ prevent language

¹²¹ See, for example, [Mobile Browsers and Cloud Gaming market investigation Working Paper 5](#), 5 July 2024, paragraphs 4.60-4.62.

¹²² Google's response to the CMA's consultation on proposed search conduct requirements, February 2026, paragraphs 100-102.

¹²³ Google submission to the CMA.

¹²⁴ Responses to the CMA's consultation on proposed User Choice CR: DuckDuckGo, page 5; Anonymous 10, page 3.

¹²⁵ Response to the CMA's consultation on proposed User Choice CR: Computer and Communications Industry Association, page 4.

¹²⁶ Response to the CMA's consultation on proposed User Choice CR: Anonymous 10, page 3.

¹²⁷ Response to the CMA's consultation on proposed User Choice CR: DuckDuckGo, page 5.

discouraging switching as risky,¹²⁸ put verification systems in place¹²⁹ and capture how the prompts are triggered.¹³⁰

Our current proposed approach

4.106 After considering the evidence provided by both Google and third parties, we do not propose making any changes to our proposed approach to prompts. We consider our proposal will ensure that any and all prompts by Google must be aligned with the proposed choice design principles¹³¹ and should not undermine user choice or negatively affect other search providers.

Compliance and monitoring

Our proposed approach in the January 2026 consultation

4.107 We set out proposed compliance and monitoring measures for the User Choice CR, which included a six-month implementation period, six-monthly compliance reporting, which we would expect to include explanations of compliance, a summary of third-party feedback and certain specified metrics.

Summary of responses

4.108 With regards to implementation timelines, Google stated that elements of the proposed CR would require complex changes to Android and Chrome and it would likely require additional time to build and launch certain features.¹³²

4.109 Google responded that six-monthly reporting on this CR was unnecessary and disproportionate and that annual reporting would align with international norms and strike the correct balance between providing sufficient reporting to the CMA while not being unduly burdensome.¹³³

¹²⁸ Response to the CMA's consultation on proposed User Choice CR: Trainline, page 17.

¹²⁹ Response to the CMA's consultation on proposed User Choice CR: Shaping Competition in the Digital Age, page 19.

¹³⁰ Response to the CMA's consultation on proposed User Choice CR: Mozilla, page 9.

¹³¹ As set out in the proposed interpretative notes and which have not been changed substantively from the version set out in the January 2026 consultation.

¹³² Google's response to the CMA's consultation on proposed search conduct requirements, February 2026, paragraph 103.

¹³³ Google's response to the CMA's consultation on proposed search conduct requirements, February 2026, paragraph 103.

- 4.110 Two third parties were supportive of the need to impose effective compliance and monitoring procedures.¹³⁴ Other third parties provided suggestions on how the compliance and monitoring process should be conducted.
- (a) OpenAI suggested that the implementation timeline should be shorter than six months.¹³⁵
 - (b) Shaping Competition in the Digital Age supported six-monthly compliance reports¹³⁶ while CCIA was in favour of annual reporting.¹³⁷ Two stakeholders suggested that data on effectiveness should be made public.¹³⁸
 - (c) Platform Leaders argued in favour of a number of reporting metrics, including monitoring switching behaviours and conducting periodic qualitative research to measure user understanding of options.¹³⁹ Mozilla and Which? both supported the use of behavioural audits to explore the user journey and any choice architecture issues.¹⁴⁰
 - (d) Two stakeholders expressed concerns that commercially sensitive information should be protected in any correspondence around choice screen application decisions.¹⁴¹

Our current proposed approach

- 4.111 Having considered the responses to the January 2026 consultation, we have made some amendments to the proposal for implementation and monitoring.
- 4.112 We propose that the User Choice CR would come into force within six months following imposition, except for the obligation at paragraph 12 of the proposed CR, which we would expect to come into force one month following imposition, so that:

¹³⁴ Responses to the CMA's consultation on proposed User Choice CR: Samsung, page 5; Which?, page 5.

¹³⁵ Response to the CMA's consultation on proposed User Choice CR: OpenAI, page 7.

¹³⁶ Response to the CMA's consultation on proposed User Choice CR: Shaping Competition in the Digital Age, page 19.

¹³⁷ Response to the CMA's consultation on proposed User Choice CR: Computer and Communications Industry Association, page 5.

¹³⁸ Responses to the CMA's consultation on proposed User Choice CR: Dnes & Felver, page 6; Shaping Competition in the Digital Age, page 20.

¹³⁹ Response to the CMA's consultation on proposed User Choice CR: Platform Leaders, page 2.

¹⁴⁰ Response to the CMA's consultation on proposed User Choice CR: Mozilla, page 9; Which?, page 5.

¹⁴¹ Responses to the CMA's consultation on proposed User Choice CR: Computer and Communications Industry Association, page 5; Shaping Competition in the Digital Age, page 20.

- (a) Google can complete the process set out in that paragraph to identify the list of Eligible Providers ahead of implementing the rest of the conduct requirement; and
- (b) the Eligible Providers can prepare for any steps they may wish to take ahead of the rest of the conduct requirement coming into force.

4.113 Google would be required to provide periodic reporting to the CMA. We propose that this would be every six months in the first year following imposition of the User Choice CR. Thereafter, and for the remainder of the designation period, we would expect to require Google to report annually, subject to the CMA being generally satisfied with Google's compliance. We consider this approach would allow the CMA to reduce the burden of compliance reporting where we are generally satisfied, but with the potential to increase oversight if concerns arise.

4.114 We would expect Google to prepare a non-confidential version (alongside the confidential version) of each compliance report and related performance metrics and publish this at the same time as submitting it to the CMA.

4.115 We would expect Google to inform the CMA of any changes to the Search Choice Screen or related choice architecture in advance of any rollout, including sharing any user testing plans and findings. Google would also be expected to notify Eligible Providers at least three months in advance of the initial Search Choice Screen rollouts and each annual 'redisplay' of the Search Choice Screen. Where a provider is approved as an Eligible Provider less than three months before the relevant initial rollout or redisplay, Google would be expected to include, as part of the confirmation of their approval, information on the timing of the initial Search Choice Screen rollout and annual redispays, as relevant.

4.116 In addition to the metrics in the January 2026 consultation,¹⁴² we also propose to require Google to supply the following to enable us to assess the impact and effectiveness of, and Google's compliance with, the User Choice CR:

- (a) the number of times a user has accessed the full list of Eligible Providers, where this option is available on the Search Choice Screen or within the Device-Level Default Settings; and
- (b) for each Eligible Provider, a breakdown of the number and proportion of times it was displayed in each position on the Search Choice Screen and

¹⁴² See [Consultation: User Choice Conduct Requirement](#), 28 January 2026, paragraphs 4.72.

the number and proportion of users selecting that provider when displayed in each position.

- 4.117 We propose that all metrics (outlined above and in the January 2026 consultation) should include reporting for Android devices and Chrome on desktop and iOS devices. We also expect Google to provide data with sufficient granularity by device.

5. Provisional proportionality assessment of the User Choice CR

- 5.1 The CMA may only impose a CR if it considers that it would be proportionate to do so for the purposes of one or more of the statutory objectives, having regard to what the CR is intended to achieve (see paragraph 2.1 above).¹⁴³
- 5.2 This section sets out our updated provisional proportionality analysis for our proposed User Choice CR. A proportionate CR is one that:
- (a) is effective in achieving its intended aim;
 - (b) is no more onerous than it needs to be to achieve its intended aim;
 - (c) is the least onerous CR, where the CMA has identified multiple equally effective options that would achieve the intended aim; and
 - (d) does not produce disadvantages that are disproportionate to its aim.¹⁴⁴

The CR is effective at achieving its intended aim

- 5.3 The analysis set out above shows how the proposed User Choice CR is designed to be effective in meeting its aim.

The CR is no more onerous than necessary

- 5.4 The proposals we have set out are designed to meet the aim of the CR effectively while minimising the burdens for Google and third parties. For example, we have focused on key search access points, while acknowledging that other access points could be included if usage changes.

The CR is the least onerous of equally effective options that would achieve the same aim

- 5.5 In our effectiveness assessment we have identified the design choices that would achieve the aim of the CR. At this stage, we have not identified less onerous approaches that would be equally effective in meeting the aim.

¹⁴³ Section 19(5) of the Act.

¹⁴⁴ CMA194, paragraph 3.33.

The CR does not produce disadvantages which are disproportionate to the aim

- 5.6 In the assessment below, we set out the main potential costs and benefits of our updated proposals for the User Choice CR for Google and other parties and our assessment of their relative size. As part of this, we summarise the feedback we received on the proportionality analysis set out in our January 2026 consultation and explain how our updated analysis reflects this feedback.
- 5.7 On the current evidence, we consider that the potential benefits outweigh the potential costs and therefore the User Choice CR would not produce disadvantages which are disproportionate to the aim.

Potential costs of the CR

Costs to Google

Our proposed approach in the January 2026 consultation

- 5.8 We included estimated costs to Google of:
- (a) extending the Search Choice Screen to Chrome on desktop and iOS (ie showing it on all Relevant Browsers and Relevant Devices) of [around £5 million] over a five-year period; and
 - (b) the ‘test-drive’ function of [up to £5 million] over a five-year period.¹⁴⁵

Summary of responses

- 5.9 Google submitted that its cost estimates above are preliminary and conservative as they do not include the cost of addressing technical issues or maintaining servers (due to server breakage risk from the significant volume of choice screens shown in a single day).¹⁴⁶
- 5.10 Google also submitted that we had underestimated the costs to it from the proposed CR because choice screens that disrupt user journeys and cause user annoyance will degrade the quality and competitiveness of Android and Chrome versus Apple and Microsoft, which are not under similar obligations. To illustrate this, it cited the experience of EU users losing access to their

¹⁴⁵ Google’s response to the CMA’s RFI.

¹⁴⁶ Google submission to the CMA.

Discover feed as a result of the DMA choice screens' operation and [✂] receiving hundreds of complaints.¹⁴⁷

Our current proposed approach

- 5.11 We consider that any impact of the proposed changes to the CR on the costs to Google used in our January 2026 consultation will be relatively limited.¹⁴⁸ To negatively impact competition, there would need to be significant costs to users that reduce the attractiveness of Chrome or Android, which is not the case here (see the '*Costs to Users*' section below).¹⁴⁹ Therefore, we do not expect material effects on competition between browsers or mobile platforms.
- 5.12 Consequently, we have used the same estimated costs to Google as used in our January 2026 consultation.

Costs to Users

Our proposed approach in the January 2026 consultation

- 5.13 We estimated:
- (a) each year the proposed CR would result in [40-50] million choice screens on Android devices and [15-35] million choice screens on Chrome on desktop and iOS devices;
 - (b) these non-skippable choice screens would take an average of 25 seconds to navigate resulting in an average time cost per showing of a little under 14p; and
 - (c) the 'test-drive' function would entail some further unquantified time cost for users.

¹⁴⁷ Google submission to the CMA. In terms of the scale of the impact Google estimated that if 1 in 1000 Android users switch to iOS that could cost Google \$[5-15]m over five years (based on the cost to Google of losing non-Pixel premium Android users, and ignoring Chrome on non-Android completely).

¹⁴⁸ While Google submitted that its cost estimates are conservative, the proposed changes to the CR are likely to reduce costs offsetting some or all of any conservativeness.

¹⁴⁹ We also note that Google has produced no evidence that the presence of choice screens is a factor that influences a user's browser or operating system choice and there appear to be a wide range of other factors that influence a user's choice of smartphone. See: Accent, [Mobile Consumer Survey](#), March 2025, figure 9.

Summary of responses

- 5.14 Google submitted that the CMA had underestimated the time to complete the Search Choice Screen because:
- (a) the CMA estimate was based on a Mozilla study of non-interruptive browser choice screens shown at setup without a test drive option;
 - (b) the estimate does not account for their interruptive nature;¹⁵⁰
 - (c) the 'test-drive' option would increase the time taken on the Search Choice Screen, including:
 - (i) by those who chose not to use the option, but faced an increased cognitive load required to comprehend and evaluate a dual-button user interface presenting both the standard 'set as default' button and the 'test-drive' button, as well as potential confusion regarding its purpose or the permanence of the decision¹⁵¹ and
 - (ii) because users who used the option would be subsequently interrupted.¹⁵²
- 5.15 Google also submitted that the CMA had under-counted the number of Search Choice Screens that would be shown, including because multiple would be shown on desktop and iOS devices using Chrome where users had multiple Chrome profiles on the same device.¹⁵³
- 5.16 Google further submitted that while the costs of our revised proposals are lower than the original proposal, the costs still considerably outweigh the benefits.¹⁵⁴
- 5.17 As set out in paragraph 4.48(a), some other stakeholders highlighted potential negative impacts on end users of redisplaying the Search Choice Screen.

¹⁵⁰ Google submission to the CMA.

¹⁵¹ Google submission to the CMA. Google submitted user research which found users took an additional [10-20] seconds to navigate a non-interruptive setup wizard choice screen when it included a 'test drive' (but the user does not select it) (Google submission to the CMA).

¹⁵² Google submission to the CMA.

¹⁵³ Google submission to the CMA.

¹⁵⁴ Google submission to the CMA.

Our current proposed approach

5.18 In light of Google's submissions and changes to the design of the proposed CR, we have updated our assessment of the costs to users. This section considers the costs to users associated with:

- (a) non-skippable Search Choice Screens at first use or setup;
- (b) annual redisplay of the Search Choice Screens; and
- (c) the 'test-drive' option.

- *Choice screens at first use or setup*

5.19 The proposed User Choice CR requires non-skippable Search Choice Screens be displayed:

- (a) on new Android devices on first use or setup;
- (b) on desktop and iOS devices using Chrome after the CR comes into force;
- (c) on desktop and iOS devices using Chrome after first use or setup.

5.20 To estimate the cost to users, we first estimate the average time spent by a user to go through the Search Choice Screen journey. In our assessment we have continued to use the estimate of 25 seconds we used in our January consultation.¹⁵⁵ This may be conservative given that Google's user research suggested that the Search Choice Screen at set-up without a 'test-drive' option would take only [10-20] seconds to navigate.¹⁵⁶

5.21 When combined with an estimate of the average value of a UK consumer's non-working time,¹⁵⁷ this gives an average time cost per showing of the Search Choice Screen of a little over 5p. This is more appropriate than using

¹⁵⁵ Mozilla, [Can browser choice screens be effective?](#), accessed by the CMA on 4 December 2025, page 52. We note that this research concerns browser choice screens and the proposed CR relates to search, and that Google considered that this and the research being carried out by a third party made the estimate unreliable. However, we consider the experience of considering options and making a selection would be similar.

¹⁵⁶ Google submission to the CMA.

¹⁵⁷ To estimate the average value of a UK consumer's non-working time based on Department for Transport analysis. The 2026 market value of non-working time (other) is £7.21 per hour (see [tag-data-book-v2-03.xlsm](#), table A1.3.2).

the average UK hourly wage as we did in the January 2026 consultation, as setting up a new phone or browser is likely to be a non-work task.¹⁵⁸

- 5.22 Next, we estimate the number of non-skippable Search Choice Screens that would be shown at first use or set up on Android and then on desktop and iOS devices using Chrome.
- 5.23 Under our revised proposals there would be far fewer non-skippable Search Choice Screens as they would not be shown annually. We estimate the number of non-skippable Search Choices Screens displayed would be [5-10] million a year¹⁵⁹ on Android devices and on desktop and iOS devices using Chrome an initial [15-35] million^{160, 161} after the CR comes into force and then [5-15] million a year.¹⁶² This would result in a total additional cost to users of £[0-5] million over the 5-year period.¹⁶³

¹⁵⁸ This is also in line with the approach taken by other regulators, such as the FCA and Ofcom (see [Valuing consumers' time in our Cost Benefit Analysis](#) and [Consumer Standards Impact Assessment \(IA\)](#), page 25).

¹⁵⁹ This is based on the number of Android choice screens shown in 2024 (Google's response to the CMA's RFI). While Google currently implements the Android choice screen on a voluntary basis, for the purpose of this proportionality assessment we assume this choice screen would have stopped absent the proposed CR.

¹⁶⁰ This consists of roughly [10-20] million desktop devices and [5-15] million iOS devices. To calculate this, we have estimated the number of Chrome users on desktop (as a proxy for the number of devices) by taking Uswitch data from March 2021 and combining with Statcounter data on the Chrome desktop market share as of November 2025. We have then added the number of iOS Chrome clients (as a proxy for the number of devices) based on data submitted to us from Google. See: Uswitch, [UK Mobile Phone Statistics 2025](#), August 2026, accessed by the CMA on 15 September 2026; Statcounter Global Stats, ['Desktop Browser Market Share United Kingdom'](#), accessed by the CMA on 5 January 2026; Google's response to the CMA's RFI.

¹⁶¹ Google submitted that users would see a new Search Choice Screen on each new device on which they use Chrome and each new profile they create and estimated this would result in [50-80]m choice screens a year based on the number of new Chrome clients each year (Google submission to the CMA). Given that the proposed CR requires a non-skippable Search Choice Screen on Relevant Browsers just once at set up or first use, we consider our estimate of the number of choice screens to be more appropriate. Nevertheless, we have also considered the impact of Google's estimate on our assessment.

¹⁶² To estimate the number of times Relevant Browsers are set up or first used on desktop and iOS devices, we estimate the number of new desktop and iOS devices as this is likely to be the main reason to need a new Relevant Browser. We estimate this by first calculating the proportion of new Android devices (based on the number of Android choice screens) to the total number of Android devices (excluding very old legacy devices) from, ie [5-10]m/30m = [15-35]%. We then apply this to our estimate of the total number of desktop and iOS devices using Chrome, ie [15-35]m. This approach has limitations including that there are other reasons why users may install a new Relevant Browser and that replacement patterns on Android may not match those on desktop and iOS. We note that, for the reasons set out in the previous footnote, Google estimated that there would be [20-40]m new Chrome profiles which would be shown non-skippable choice screens in subsequent years (Google submission to the CMA).

¹⁶³ Based on Google's estimate of the required number of choice screens this cost would be £[5-10] million over the 5-year period.

- *Annual redisplay of the choice screens*

5.24 Under our updated proposals, a skippable and visually limited Search Choice Screen would be redisplayed each year on new Android devices and desktop and iOS devices using Chrome. We estimate this will result in [65-135] million additional Search Choice Screens being shown over the five-year period.^{164, 165}

5.25 One of the key reasons for proposing a skippable and visually limited screen is to minimise the cost to users (see paragraphs 4.53). We expect there to be no material time cost for users that do not engage, since they can immediately dismiss the Search Choice Screen. Users that do engage with the Search Choice Screen will incur an average time cost of 5p (see paragraph 5.19). The total cost to users depends on the proportion of users who choose to engage. As this proportion also impacts the benefits of this part of the proposed CR, we consider this further in the *Comparing costs and benefits* section below.

- *The ‘test-drive’ option*

5.26 The ‘test-drive’ function could add to the time users take to navigate the Search Choice Screen in two ways. First, users could take longer to navigate the Search Choice Screen (see paragraph 5.13(b)). While this is possible in principle, we do not consider Google’s user research robust enough to establish that it would occur in practice, or to quantify it¹⁶⁶ and we also note that the baseline time estimate we are using may be conservative (paragraph 5.18).

¹⁶⁴ The first redisplay choice screens will be in the third year as the first non-skippable choice screens will be in year two. We estimate there will be [15-30]m redisplay on choice screens on Chrome on desktop and iOS devices based on [15-35]m total devices with [0-5]m having seen a choice screen in the previous six months as a result of newly installing Chrome. We estimate there will be [2.5-5]m redisplay choice screens on Android devices in year 3 rising to [12.5-25]m in year 5. This is based on there being [5-10]m new Android devices each year, none leaving circulation and half of the devices that saw the screen at setup in the previous year doing so within six months and so being exempt from seeing the redisplay choice screen the next year. We note that these calculations assume Google can avoid showing a redisplay choice screen to devices within six months of seeing a choice screen at first use or setup.

¹⁶⁵ Based on Google’s estimate of the required number of choice screens (see footnotes 161 and 162), this would be [110-255]m additional Search Choice Screens being shown over the five-year period.

¹⁶⁶ For example, we have not seen the detailed methodology underlying the research, and it had a total of [20-30] participants (Google submission to the CMA). By comparison the Mozilla research relied on for the duration of the choice screen at first use or setup had 12,000 participants and over 7,000 who saw choice screens Mozilla, [Can browser choice screens be effective?](#), accessed by the CMA on 4 August 2026, page 22 and Table 2.

- 5.27 Second, where the ‘test-drive’ function is selected, users may spend some additional time at the end of the ‘test-drive’ period engaging with their options and updating their default search provider. Under our revised proposals, the notification at the end of the ‘test-drive’ period will be skippable and visually limited (see paragraph 4.71(b)) resulting in no material time cost to users that choose not to engage further. The total cost to users who choose to engage at the end of the ‘test drive’ depends on the proportion of users doing so. As this proportion also impacts the benefits of this part of the proposed CR, we consider this further in the *Comparing costs and benefits* section below.

Costs to OEMs

Our proposed approach in the January 2026 consultation

- 5.28 At that time, we had not seen clear evidence that elements of the proposed CR would require device-side changes by OEMs, so did not include any such costs.

Summary of responses

- 5.29 Google submitted that OEMs may be required to carry out some device-side changes to enable some of the proposals that were part of the proposed CR, particularly the ‘test-drive’ function and Search Choice Screens outside of device setup.¹⁶⁷
- 5.30 Overall, third-party OEMs suggested that the annual redisplay and ‘test-drive’ function could be developed and implemented by Google, with limited time and costs required by OEMs to support the inclusion of these features on their devices. However, they indicated there was uncertainty due to different potential ways the features could be implemented (see paragraphs 4.48(b) and 4.65(c)).

Our current proposed approach

- 5.31 We are proposing to limit the annual redisplay and ‘test-drive’ option to new Android devices (as well as Chrome on all desktop and iOS devices), which mitigates any potential cost to OEMs due to the greater cost and technical complexity associated with applying them to existing Android devices. As

¹⁶⁷ Google’s response to the CMA’s RFI; Google’s submission to the CMA.

such, we consider that the costs to OEMs – beyond the business-as-usual costs of testing and implementing updates – are minimal.

Summary of costs

5.32 The table below sets out the potential 5-year costs based on the calculations in this section.

Table 1 Summary of quantified costs over a 5-year period

Option	Costs to Google	Costs to users	Costs to OEMs	Total costs
Search Choice Screen on new Android devices	£[0-10] million ¹⁶⁸	£[0 - 5] million	N/A	£[5-15] million
Search Choice Screen on Chrome on desktop and iOS devices		£[0 - 5] million		
Annual Redisplay		N/A ¹⁶⁹		
'Test-drive' function	£[0-5] million	N/A		£[0-5] million

Source: CMA analysis of Google data in combination with publicly available data sources on market shares, desktop users and the value of non-working time.

Potential benefits of the CR

5.33 The two main benefits of the proposed CR are:

- (a) increasing competition in general search services, leading to better services for consumers; and
- (b) enabling more people to find a general search service that better matches their preferences.

Benefit of increased competition

Our proposed approach in the January 2026 consultation

5.34 We highlighted evidence that by increasing user awareness of, and engagement with, the range of available search providers, an increased prevalence of choice screens would be likely to lead to increased competition in general search and therefore better, more innovative services for consumers.

5.35 The mechanisms for this include search providers (including Google) having a greater incentive to compete for users; Google's rivals being more likely to

¹⁶⁸ As we do not have separate cost estimates, this figure includes the total cost to Google of the Search Choice Screen on new Android devices and on Chrome on desktop and iOS devices and of annual redisplay.

¹⁶⁹ For Annual Redisplay and 'Test-drive' there are costs to users that engage with the skippable Search Choice Screen and skippable notification at the end of the 'test-drive' period. These are considered in the *Comparing costs and benefits* section below.

benefit from greater economies of scale, improving their services and thereby becoming stronger competitors to Google and increasing the pressure for Google to compete for users; and a greater scope for successful innovation and disruptive long-run entry.

- 5.36 As such, we considered that by increasing the prevalence of choice screens, the proposed CR would lead to greater competition in general search.

Summary of responses

- 5.37 Google submitted that there was no evidence that annual redisplay or the ‘test-drive’ option would result in an incremental increase in competition relative to the benefits already achieved by Google’s proposed user choice solutions.¹⁷⁰

Our current proposed approach

- 5.38 We consider that each part of the proposed CR contributes to increasing competition. For example, the annual redisplay provides users with a prompt to make an active choice creating greater opportunities for competitive pressure to be exerted as user preferences and the available options evolve, particularly as and when new products are developed. Similarly, the ‘test-drive’ option encourages users to discover providers they have not tried previously at a time they are actively considering this choice. As such, the ‘test-drive’ option may address misperceptions about the quality of Google’s rivals, which are potentially an important obstacle to them putting more competitive pressure on Google.¹⁷¹
- 5.39 Following the approach taken in the January 2026 consultation, we have not directly quantified this benefit but consider the likelihood that it would exceed the costs in the ‘*Comparing costs and benefits*’ section below.

¹⁷⁰ Google submission to the CMA.

¹⁷¹ [Sources of Market Power in Web Search: Evidence from a Field Experiment](#), Allcott et al, p19. The paper’s results suggest that users that were exposed to Bing for two weeks had improved perceptions of Bing after exposure. [The Potential Anticompetitive Stickiness of Default Applications: Addressing Consumer Inertia with Randomization](#), Duque, 2022. Data from the paper data suggest that consumers’ misperceptions about Google alternatives’ quality are an important obstacle to their market penetration.

Benefit of consumers using a preferred search provider

Our proposed approach in the January 2026 consultation

- 5.40 We consider that as the proposed User Choice CR would increase the prevalence of choice screens it would also be likely to increase the number of users that find a search service that better matches their preferences. We estimated the user benefit from finding a search provider that better met their preferences as £149 per device, based on an academic paper by Allcott et al.

Summary of responses

- 5.41 Google submitted that our estimate was too high because the figure we used suffered from sample bias and a lack of representativeness (as it relies on pre-existing Bing users on Edge browsers) and that a more appropriate figure could be calculated using consumer surplus estimates from the Allcott et al paper, which better reflect the broader user populations relevant to the proposed CR.¹⁷²

Our current proposed approach

- 5.42 Putting a specific monetary value on the benefit that users may gain from switching their search service is inevitably difficult, particularly given that most such services are provided free to the user. In light of Google's submission, we have reconsidered the most appropriate value to use for the benefit to consumers of finding a search service that better matches their preferences. There are a range of estimates of this value, including:
- (a) Google's own research found that the average Google user would have to be paid £39 a month to go without access to Google.¹⁷³ This equates to £468 consumer surplus a year per user.
 - (b) As well as the £149 figure we used in the January 2026 consultation, there are two sets of consumer surplus figures in the research that can be used to estimate this benefit:

¹⁷² Google submission to the CMA.

¹⁷³ Google asked its 4000 survey respondents 'Imagine you had to choose between the following options. Would you prefer to keep access to Google Search or go without access to Google Search for one month and get paid £PRICE?' The price offered was randomised between £1.25, £2.50, £5, £10, £20, £50, £100, £200 and £500. They regressed the results of this poll to derive a demand curve and used this to calculate median consumer surplus per user. See: Public First, [Google's Economic Impact in the UK 2023](#), July 2023, page 26 and page 75.

- (i) one unadjusted that results in an estimate of the benefit per device of £4.22;¹⁷⁴ and
- (ii) a set adjusted for the demographics of the wider US population, where the research was done, ie to reweight users to match the US population of computer users by age, income, and education. This results in an estimate of the benefit per device of £14.77.¹⁷⁵

5.43 All three figures were estimated for a different purpose and so have drawbacks.¹⁷⁶ However, the figures based on the consumer surplus estimates from Allcott et al more closely align with the benefit we are seeking to estimate than the figure based on Google’s research and, as the lower estimates, are also more conservative. In the ‘*Comparing costs and benefits*’ section below, we consider the benefits implied by each of these two estimates.

5.44 The extent to which this benefit arises depends on the number of users who are exposed to the Search Choice Screen as a result of our proposed CR and the extent to which they choose a more preferred search provider as a result. In our January consultation we noted that the available evidence indicates switching rates of approximately 1% due to choice screens.¹⁷⁷

5.45 As we noted in our January 2026 consultation, although switching can give rise to benefits when it enables consumers to find a service that better meets their needs, the aim of our intervention is not to encourage switching per se,

¹⁷⁴ CMA calculations based on Allcott et al., (2025), [Sources of Market Power in Web Search: Evidence from a Field Experiment SearchMarket.pdf](#), Table 7. This is the reported consumer surplus of \$0.08 annually divided by the estimated change in Bing’s market share on Chrome from the intervention (1.4 percentage points - difference between column (3) under ‘Status Quo’ and ‘Choice Screen’) converted to GBP based on the exchange rate \$1.3545:£1 (See Bank of England, [GBP Exchange Rates](#), accessed by the CMA on 7 September 2026).

¹⁷⁵ CMA calculations based on Allcott et al., (2025), [Sources of Market Power in Web Search: Evidence from a Field Experiment](#), Table A16. This is the reported consumer surplus of \$0.44 annually divided by the estimated change in Bing’s market share on Chrome from the intervention (2.2 percentage points - difference between column (3) under ‘Status Quo’ and ‘Choice Screen’) converted to GBP based on the exchange rate \$1.3545:£1 (See Bank of England, [GBP Exchange Rates](#), accessed by the CMA on 7 September 2026).

¹⁷⁶ All three are median figures and users that are likely to switch because of a choice screen seem likely to be those with weaker preferences between search engines. The two figures based on the consumer surplus estimates are based on research that only covered desktop, and given that mobile accounted for 70-80% of total Google Search queries at the end of 2024, the value a user may place on having their preferred search engine on mobile could be even higher. See [Strategic Market Status investigation into Google’s general search services: Final Decision](#), 10 October 2025, [Appendix B – Market Outcomes Annex](#), paragraph B.8.

¹⁷⁷ Based on: the proportion of users selecting Google competitors on Android versus on macOS/OSX – sources: CMA analysis of data provided in Google’s response to the CMA’s RFI. And past literature: Allcott et al., (2025), [Sources of Market Power in Web Search: Evidence from a Field Experiment](#). Decarolis et al., (2025); [Competition and Defaults in Online Search](#); DuckDuckGo, [Google Search Mobile Market Share Likely to Drop Around 20% through Search Preference Menus](#), August 2020, accessed by the CMA on 7 September 2026.

but instead to ensure that consumers are able to make an active and informed choice about which service they use thereby driving increased competition (the first benefit we have identified).

Comparing the costs and benefits

5.46 In this section we bring together the evidence on the costs and benefits and consider their relative size. We first compare the benefits of increased competition to the total costs of the proposed CR. As set out below, we consider this benefit alone would likely outweigh the entire costs of the proposed CR. We also compare the benefit of finding a preferred search service to the total costs of the proposed CR. This benefit in isolation is of a similar magnitude to the total costs of the proposed CR. However, these benefits are supplementary to the benefits of increased competition.

Increased competition

5.47 As set out in section 4, we consider our revised proposed CR will be effective in achieving the aim set out at paragraph 2.1. As such, we expect the proposed CR to increase the competitive pressure faced by Google and the incentive for its rivals to compete. This would likely have large benefits relative to the costs of the proposed CR given that:

(a) Google has more than [60-70] million users in the UK¹⁷⁸ and estimates that its median user values Google at almost £500 per year.¹⁷⁹ If increased competitive pressure on Google led to an improvement in user experience equivalent to [5-10]p per year (a small proportion of the £500 per year value estimated by Google), the direct benefit to users alone would outweigh the total costs of the proposed CR over the 5-year period.^{180, 181}

¹⁷⁸ [Strategic Market Status investigation into Google's general search services: Final Decision](#), 10 October 2025, paragraph 5.276(b). This is the number of logged-in users of its general search services on mobile as of December 2024. Google had a further [20-30] million logged-in users on desktop as of December 2024. A single individual may account for multiple logged-in users.

¹⁷⁹ Public First, [Google's Economic Impact in the UK 2023](#), July 2023, pages 26 and 74, accessed by the CMA on 8 December 2025.

¹⁸⁰ Based on Table 1 above, we consider the maximum costs for the User Choice CR over the 5-year period would be £[5-20] million. This is done by adding all the Google costs in the table to the user costs.

¹⁸¹ $[\text{£}]\times[\text{£}]\times\text{four years (ie allowing a one-year build)}\times\text{discounting}=\text{£}[\text{£}]$ which exceeds the maximum five-year cost outlined in Table 1 above when combining costs to Google with costs to users. Increased competition would also likely mean that users of other search providers would also benefit from improvements to user experience.

(b) In 2024, Google generated £[10-20] billion of search advertising revenue from users in the UK.¹⁸² If increased competition led prices to fall by [0-0.1]%, the benefit of this to advertisers would outweigh the total forecasted costs of implementing the proposed CR outlined in the section above.¹⁸³

5.48 We consider this benefit alone would likely outweigh the entire costs of the proposed CR. Further, for the reasons set out in section 4, each part of the proposed CR contributes to that effectiveness, and we consider they are each likely to result in benefits from increased competition that outweigh their costs.

Preferred search provider

5.49 We set out below, for each part of the proposed User Choice CR, the quantified costs and provide illustrative calculations of the required proportion of additional users that would need to choose a search provider that better matches their preferences for this benefit alone to outweigh the total quantified costs of the proposed CR.^{184, 185} We present a range based on the two benefit per device figures set out in paragraph 5.41(b).

Requiring the Search Choice Screen on new Android devices and Chrome on desktop and iOS devices

5.50 Requiring the Search Choice Screen on new Android devices and Chrome on desktop and iOS devices results in total costs over the 5-year period of up to £[10-20] million.¹⁸⁶ For this benefit to equal the cost of this part of the CR, an additional [0-5]% of devices would need to find a search provider that better matches the user's preferences.¹⁸⁷ Given that past literature has found a

¹⁸² Based on Google's response to the CMA's RFI.

¹⁸³ £[£] * [£]% * four years (ie allowing a one-year build) * discounting = £[£] which exceeds the maximum five-year costs outlined in the table above.

¹⁸⁴ That is before considering the benefit of increased competition discussed above.

¹⁸⁵ We do these comparisons over a five-year period. We conservatively assume a set up period of one year, meaning we count just four years of benefits and costs to users. We discount the five-year costs and benefits using a 3.5% discount rate based on guidance issued by HM Treasury in the [Green Book](#).

¹⁸⁶ See Table 1 above. To be conservative, we use the top of the range of costs given by Google. We also note that as we do not have separate estimates, this figure includes the total cost to Google of both a Search Choice Screen on Chrome on desktop and iOS and an annual Search Choice Screen on Android.

¹⁸⁷ Based on Google's estimate of the required number of choice screens (see footnotes 162 and 162), an additional [0-5]% of devices would need to find a search provider that better matches the user's preferences. This estimate assumes that the potential level of benefits is determined by the number of devices and does not increase if multiple profiles on devices each see a choice screen. We consider that even with this required level of switching, this benefit is likely to at least offset a significant proportion of the costs of the proposed CR.

switching rate of at least around 1% from choice screens,¹⁸⁸ this benefit alone may outweigh the costs of this part of the proposed CR and is likely to at least offset a significant proportion of the costs of the proposed CR.

Annual redisplay

5.51 The costs of this part of the proposed CR are:

- (a) the costs to Google. As we do not have a separate estimate for the costs to Google of just this part of the proposed CR, we use the total costs to Google of both this and the previous part of the CR; and
- (b) the costs to users who choose to engage with the skippable Search Choice Screen which we account for by adjusting the benefit to users of finding a search provider that better matches their preferences.¹⁸⁹

5.52 Our illustrative calculations suggest that an additional [0-5]% of devices would need to switch for this benefit alone to outweigh the total costs to Google of both this and the previous part of the CR.^{190, 191} While a lower proportion of users are likely to engage with, and switch as a result of, the skippable redisplayed Search Choice Screen than the 1% found in the past literature, we consider that sufficient users would engage to mean that this benefit would at least offset a significant amount of the costs to Google of this and the previous part of the proposed CR.

¹⁸⁸ Allcott et al., (2025), [Sources of Market Power in Web Search: Evidence from a Field Experiment](#), page 2. Allcott et al found 1.1% of users switched to Bing from Google after being asked to make an active choice, ie being asked what search engine they would like to be their default and receiving detailed guidance to implement their choice. Decarolis et al., (2025), [Competition and Defaults in Online Search](#), SSRN, page 15. Decarolis et al found that following the introduction of choice screens in the EEA after March 2020, Google's market share in EEA countries decreased as a result by between 0.5 and 1.5 percentage points. We also note that DuckDuckGo published research that indicated a search preference menu could result in a 20% drop in Google market share depending on the way it was designed, showing the impact that changes to choice architecture practices could have on market shares. See DuckDuckGo, [Google Search Mobile Market Share Likely to Drop Around 20% through Search Preference Menus](#), August 2020, accessed by the CMA on 10 December 2025.

¹⁸⁹ This time cost is 5p and this assumes that all those that engage with the Search Choice Screen do so to change their search providers, which seems reasonable as this would be the motivation for choosing to engage.

¹⁹⁰ This is a conservative benchmark as the additional switching required to outweigh the costs of just this part of the CR would necessarily be less.

¹⁹¹ Using Google's estimate of the number of Search Choice Screens (see footnote 161) would increase the required level of switching because it implies that users would need to spend more time engaging with Search Choice Screens for each additional switch. However, our sensitivity analysis found, assuming that time increased in proportion to the number of choice screens, the impact on the required level of switching would be marginal.

Implementing the 'test-drive' function

- 5.53 Implementing the 'test-drive' function results in additional costs to Google of £[0-5] million when discounted over the 5-year period.¹⁹² For this benefit to equal the cost of this part of the proposed CR,¹⁹³ an additional [0-5] % of non-skippable Search Choice Screens¹⁹⁴ would need to find a search provider that better matches the user's preferences. There is evidence in the academic literature that users' preferences for search providers can change following short trials of alternatives.¹⁹⁵ As such, while there is considerable uncertainty, we consider that the 'test drive' may result in additional switching, and is likely to offset at least a significant proportion of the costs of the proposed CR.

Provisional conclusion on proportionality

- 5.54 Our updated overall provisional assessment is that the benefits of these measures, particularly as a consequence of strengthening competition, are likely to significantly outweigh the costs.¹⁹⁶ We will continue to refine our understanding of the costs and benefits of the measures as part of the final proportionality assessment, including to take account of responses to the consultation, to inform our final decision about whether to impose the User Choice CR.

¹⁹² To be conservative, we use the top of the range of costs given by Google. Google's response to the CMA's RFI.

¹⁹³ To account for the time cost to users that engage at the end of the 'test drive', we assume that each user who switches re-incurs the average time cost of navigating the choice screen.

¹⁹⁴ This is a conservative benchmark as any additional switching from skippable Search Choice Screens would reduce the amount required from the non-skippable Search Choice Screens.

¹⁹⁵ [Sources of Market Power in Web Search: Evidence from a Field Experiment](#), Allcott et al, pp19-20. The paper's results suggest that users that were exposed to Bing for two weeks had improved perceptions of Bing after exposure. [The Potential Anticompetitive Stickiness of Default Applications: Addressing Consumer Inertia with Randomization](#), Duque, 2022. Data from the paper suggest that consumers' misperceptions about Google alternatives' quality are an important obstacle to their market penetration.

¹⁹⁶ We have not identified relevant notable impacts of this intervention for people with protected characteristics.

6. Next steps

Questions for consultation

- 6.1 We welcome views on whether the proposed changes are effective in achieving the intended aim of the User Choice CR, but are particularly interested in stakeholder feedback on the following questions:
- (a) Do you agree with the proposed changes to the User Choice CR, including:
 - (i) Eligibility criteria, and associated interpretative notes, to appear on the Search Choice Screen;
 - (ii) Procedural safeguards for the process of applying the eligibility criteria;
 - (iii) Frequency of display and timing of the Search Choice Screen;
 - (iv) Design of the option to ‘test drive’ search providers on the Search Choice Screen;
 - (v) Approach to selection and ordering of the Eligible Providers on the Search Choice Screen;
 - (vi) Inclusion of a link to the full list of Eligible Providers in the Device-Level Default Setting and Browser Default Setting;
 - (vii) Third-party access to a user’s default search setting?
 - (b) Do you agree with our updated proportionality assessment for the User Choice CR?

Responding to this consultation

- 6.2 Stakeholders are invited to comment on the proposed measures set out in this document. We particularly welcome comments on the specific questions above. We will carefully consider responses to this consultation, in addition to our ongoing stakeholder engagement and wider analysis, before proceeding with any proposed measures.
- 6.3 Responses should be submitted to searchsms@cma.gov.uk or made via the [consultation portal](#) no later than 5pm on 9 October 2026. We would expect to publish responses to the consultation, subject to any representations made in relation to confidentiality of the information provided.

- 6.4 Where responses include confidential information, this should be clearly marked. A non-confidential version should also be provided that can be published on the CMA's website.