

[REDACTED]

---

**From:** Max Roper [REDACTED]  
**Sent:** Friday, 1 April 2022 2:52 PM  
**To:** Digital Monitoring  
**Subject:** Discussion Paper for Interim Report No 5. - iOS Competition

To the Digital Platform Services Inquiry,

With regard to the review into Apple's market power, an important point to note is that the ACCC should assist to promote a fair marketplace for browsers on iOS by preventing Apple from blocking / banning other competing browser engines on their operating system.

At present, Apple only allows the WebKit browser engine to be installed on all iOS devices. Other competing browser engines (Google Chrome, Mozilla Firefox etc) are forced to utilise the WebKit browser engine with a reskinned user interface.

Apple does not enforce similar restrictions on its MacOS desktop/laptop operating systems, where other browser engines can be installed per normal.

Given that Apple has complete power over the underlying browser engine that runs on all iOS devices, it does not provide users a fair choice of choosing their desired engine if Safari has compatibility issues. It only provides the user with an "illusion of choice" where other competing browser apps may appear different on the surface, but still restrict them to the shortcomings of Apple's WebKit browser engine.

The result of the above practices on iOS has led to the WebKit engine falling behind in feature parity and compatibility when comparing them to competing browser engines - particularly affecting the functionality of Web applications as well. Apple is not incentivised to improve WebKit as fast as their competition, as they have removed competition from the iOS environment completely.

Apple's restriction of one browser engine also exposes every iOS user on certain versions to security flaws at the same time, as users cannot choose a different browser engine. This most notably occurred in the vulnerability [CVE-2022-22594](#) in January 2022 where all users of iOS 15 were affected. Safari (WebKit engine) versions are bound to the entire device's operating system version, so this still affects users who have not updated their entire phone to resolve.

Allowing competing browser engines which did not have this vulnerability would allow users to mitigate the danger themselves, which MacOS desktop users were able to do without issues due to allowing competing browser engines on the platform.

If regulators step in on this issue, consumers would be able to utilise more reliable software on the iOS platform through choice of different browser engines, as well as existing WebKit engine users benefiting from Apple now needing to improve their experience to compete with other available engines.

From a software development standpoint, the experience of supporting Web applications within Apple's environment would become substantially more efficient leading to cost benefits in the maintenance of these applications. Australian businesses would be able to approach building and supporting Web applications with less worry around the current

issues present within WebKit, who as noted in the ACCC assessment holds over half of Australian market share due to iOS device usage.

I encourage the ACCC to consider these issues and offer my thanks for the opportunity to voice these concerns.

Kind regards,  
Max Roper