

[REDACTED]

---

**From:** Morgan Trench [REDACTED]  
**Sent:** Thursday, 31 March 2022 11:56 PM  
**To:** Digital Monitoring  
**Subject:** Responding to "Discussion Paper for Interim Report No 5"

Hello ACCC,

My name is Morgan Trench, I'm writing in response to the paper published [here](#), regarding consumer concerns in digital markets.

I've been working as a software engineer for close to 5 years now, with the majority of that time working with web technologies, so competition in this space is of much interest to me. I was made aware of this inquiry by a colleague, and we both felt strongly enough about it to write in.

Web browsers have been the focus of anti-competitive behaviours in the past, and it turns out still are today. Apple has significant market share in the mobile space (something like 50%), and aggressively protects its software eco-system. One of these "[protections](#)", is that all apps that browse the web on iPhones must use Apple's first party browser engine (WebKit). The effect of this is there can be no competing web browsers on the IOs platform.

This means that if a feature isn't supported by WebKit, web applications cannot use it. This hamstring the ability of web developers to compete with native IOs apps unnecessarily. The write up [here](#) goes into depth, but the summary is that web applications designed for phones cannot use 'basic' features like Push Notifications that are provided to their native counterparts. This (presumably) deliberate lack of features forces app developers to use the "walled garden" Apple platform, and pay apple for the the privilege through their 30% commision on payments in the native ecosystem (as they forbid other payments methods for native apps).

[Here](#) is an indication of the level of 'feature deprivation/lag' currently occurring on the IOs platform for web browsers applications.

I encourage the ACCC to do what you can to level the playing field in the web space on mobile devices, either by allowing alternative browser engines on the IOs platform or ensuring improved feature parity.

This allows for better competition in the IOs app space, and a better Web experience for all.

Thanks for your consideration  
Morgan/