2024/03/01

To concerned parties, Japan's Digital Markets Division Secretariat

From Keisuke Chinone

Views on the Mobile Ecosystem Liberation Debate in Japan

The recent debate on the liberation of the mobile ecosystem has been raging and there is talk of a submission to be made during the current parliamentary session. I am disappointed about this.

The release of app stores is primarily for companies with sufficient capital to distribute their apps on their own. However, small companies and individual developers already receive preferential fees to 15% and do not fully benefit from the release of their apps in third party app stores. Furthermore, most applications distributed by large companies are distributed for free and can already be paid for with their own accounts. Given the prevalence of such workarounds among well-capitalized companies, the suggestion that app fees "could lead to new value through innovation and less competition" is not convincing.

It should also be noted that the regulation is limited to mobile platforms. I recognize that the current discussion does not include "non-mobile" operating systems such as iPadOS and visionOS because the discussion relates to the target "mobile" operating systems. Therefore, APIs for building proprietary browsers and payment systems will be released for "mobile" OSs such as iOS. (Hereafter, these APIs will be referred to as new APIs.)
This may create a situation where the iOS version must be developed separately, increasing the burden and discouraging innovation. This may result in measures such as the adoption of new APIs or the abandonment of publishing in third-party app stores.

Finally, it should be noted that the Competition Assessment of the Mobile Ecosystem Final Report does not adequately discuss barriers to publishing apps. Under the current system, there are certain genres that are restricted from being published in app stores, even though there are no technical or legal problems. Examples include R18 content, NFC payments, browsers, and other apps. Eliminating such genres is necessary to promote true competition. Currently, however, the debate is limited to technical discussions in specific areas. No discussion can be found that directly addresses non-technical barriers such as expression being restricted by screening. This is because the current discussion relies on the release of app stores, payment methods, and APIs, and does not discuss the regulation of review.
It is unfortunate that there are no measures that can completely resolve all barriers to the release of apps.

I hope that appropriate laws will be enacted in the future. *Keisuke Chinone*

Contact: iroiro.work1234@gmail.com