



Computer & Communications Industry Association (CCIA) [Response Type] to [Agency/Org] on DMA Proposal Consultation 5 May 2021

The Computer & Communications Industry Association (“CCIA”) welcomes this opportunity to provide feedback on the European Commission’s proposal for a Digital Markets Act (“DMA”).

CCIA represents large, medium, and small companies in the high technology products and services sectors, including computer hardware and software, electronic commerce, telecommunications, and Internet products and services. CCIA is committed to protecting and advancing the interests of our members, the industry as a whole, as well as society’s beneficial interest in open markets, open systems and open networks.

On 11 March CCIA published its position paper addressing the underlying principles and governance framework of the DMA. CCIA supports the objectives of the DMA proposal. CCIA believes that in order to meet its stated goals, the DMA should protect the open market economy and free competition, preserve dynamic competition and innovation for the benefit of consumers, preserve business freedom, prevent distortive regulatory dependencies, and ensure a framework for digital economy regulation that will provide legal certainty and harmonisation. CCIA's position paper provides constructive suggestions to help the DMA achieve this while ensuring effective and proportionate enforcement for the benefit of consumers in the internal market. The full position paper is available at the below link:

https://www.ccianet.org/wp-content/uploads/2021/03/2021-03-11-CCIA_Position_on_DMA_Principles_and_Governance.pdf

On 12 April economic experts Drs. Teece and Kahwaty of the Berkeley Research Group (BRG) published a report prepared for CCIA titled “Is the Proposed Digital Markets Act the Cure for Europe’s Platform Ills? Evidence from the European Commission’s Impact Assessment”. The report finds that “Instead of allowing for dynamic competition to continue between platforms, the DMA would reinforce existing market structures with regulation, ossify market boundaries, and stunt innovation in Europe.” The full report is available at the below link and is attached to this submission:

<https://media.thinkbrg.com/wp-content/uploads/2021/04/11215103/Is-the-DMA-the-Cure-Teece-Kahwaty.pdf>

CCIA urges the European Commission to carefully consider the findings of the BRG report alongside CCIA’s recommendations for achieving an effective and proportionate DMA as laid out in its position paper. We look forward to working with the Commission to ensure good regulatory outcomes for Europe.