

Report

May 9, 2025¹ to December 31, 2025

In accordance with the European Commission's decision in Case DMA.100204 – Apple – Operating Systems – iOS – Article 6(7) – SP – Process, Apple publishes the below report on the functioning of its request-based interoperability process.

This report includes information on all interoperability requests that were either received by Apple on or after May 9, 2025, or were still open as of May 9, 2025, and reflects the status of those requests at the close of December 31, 2025. Any request received after December 31, 2025, and any updates to the status of existing requests after December 31, 2025, will be reflected in Apple's next KPI report.

KPI	Value
Number of requests received. [1]	102
Number of pending requests. [2] [3]	34
Number of requests that Apple considers to be potentially within the scope of Article 6(7). [4]	43
Number of requests that Apple considers to be out of the scope of Article 6(7). [4]	40
Number of requests for which no determination on the application of Article 6(7) was made as effective interoperability already exists.	9
Number of requests closed without a Phase I decision. [10]	8
Number of requests that Apple considers requiring “minor” engineering efforts in order to be implemented. [5] [2]	1
Number of requests that Apple considers requiring “mild” engineering efforts in order to be implemented. [5] [2]	18
Number of requests that Apple considers requiring “significant” engineering efforts in order to be implemented. [5] [2]	29
Number of requests currently in Phase I.	2
Number of requests currently in Phase II.	2
Number of requests currently in Phase III. [2]	30
Average time between request received and Phase I decision. [6]	16.59 working days
Average time between Phase I decision and Phase II decision. [7]	28.67 working days
Average time between Phase II decision and completion of Phase III. [8]	112 working days
Percentage of requests that moved from Phase I into Phase II. [4]	30.43%
Percentage of requests that moved from Phase II into Phase III. [9]	97.29 %
Percentage of requests that did not move from Phase I. [4]	69.57%
Percentage of requests that did not move from Phase II. [9]	2.71%

¹ This date corresponds to the cut-off date of the previous KPI report published by Apple.

KPI	Value
Number of requests in relation to which Apple has notified the Commission and informed the developer that it was unable to comply with one of the timelines set out in Section 5.8.1 of the Process Decision.	0
Total number of interoperability requests for which a solution was released. [11]	22
Number of interoperability requests that have moved to Phase III and for which an interoperability solution has been fully released.	18
Number of interoperability requests that have moved to Phase III and for which an interoperability solution has been partly released.	4

- [1] Number of requests received during the reporting period, as well as any requests received prior to 9 May 2025 that remained open as of that date.
- [2] For the purposes of this KPI, requests for which Apple has released a partial solution are counted as requests in Phase III.
- [3] Includes all requests in Phase I, Phase II, or Phase III as of Dec. 31, 2025.
- [4] Excludes requests in Phase I as of Dec. 31, 2025, and requests closed without a Phase I decision.
- [5] Includes requests in Phase III as of Dec. 31, 2025, and requests for which a solution was released during the reporting period.
- [6] Includes requests received by Apple on or after May 9, 2025 and requests that were live on that date for which Apple has rendered a Phase I decision.
- [7] Includes requests received by Apple on or after May 9, 2025 and requests that were live on that date for which Apple has rendered a Phase II decision.
- [8] Includes requests received by Apple on or after May 9, 2025 and requests that were live on that date for which Apple has completed Phase III.
- [9] Excludes requests in Phase II as of Dec. 31, 2025.
- [10] Includes requests for which developers (i) withdrew a request, (ii) did not submit requested information, (iii) submitted a blank request, or (iv) submitted identical requests.
- [11] Represents the total number of requests that were resolved by a released solution. In some instances, a single interoperability solution addresses multiple requests.

Specific KPIs on queries for the technical reference

KPI	Value
Total number of reference queries substantively assessed.	5
Total number of queries to which Apple has published a technical reference query.	1
Total number of queries rejected by Apple.	3
Total number of queries pending.	1
Total number of invalid queries. [12]	9

- [12] Includes queries for which developers (i) submitted a bug-fix request, (ii) submitted a blank request, or (iii) other queries that were clearly not valid reference queries.

Specific KPIs for the internal review mechanism

KPI	Value
Number of situations where the internal review mechanism was undertaken or is in the process of being undertaken.	5
Aggregated information about the type of disputes:	
The rejection of a request.	5
The envisaged interoperability solution.	0
The level of complexity assigned by Apple.	0

Specific KPIs for the Conciliation

KPI	Value
Number of requests for which conciliation was undertaken or is in the process of being undertaken. [13]	3
Number of requests for which Apple and the concerned developer reached a Settlement Agreement.	N/A
Number of requests for which Apple and the concerned developer did not reach a Settlement Agreement.	N/A

[13] All conciliation proceedings remained ongoing as of 31 December 2025.