



June 9, 2022

The Honorable Alan Davidson  
Administrator  
National Telecommunications and  
Information Administration  
United States Department of Commerce  
Washington, DC 20230

**Re: Request for Comment on Developing a Report on Competition in the Mobile App Ecosystem Docket No. 220418-0099**

Dear Administrator Davidson:

The U.S. Chamber of Commerce (“Chamber”) respectfully submits these supplemental comments in response to the National Telecommunications and Information Administration (“NTIA”) request for comment (“RFC”) on *Developing a Report on Competition in the Mobile App Ecosystem*. These comments are in addition to the comments the Chamber filed on May 23, 2022 and focus exclusively on data portability and interoperability issues. The Chamber recognizes that interoperability and data portability can increase competition and consumer choice. We believe both data portability and interoperability objectives can be achieved through market forces rather than government mandates.

**Interoperability**

Question 9 asks “What role does interoperability play in supporting and advancing a competitive mobile app ecosystem? When competing digital services are compatible or interoperable with each other, that reduces friction and makes it easier for consumers to choose between and among competing services.

We support market-based approaches that utilize voluntary consensus standards to enable interoperability and data portability. Successful interoperability requires three things: 1.) overcoming significant technical challenges; 2.) taking into account the substantial privacy and security considerations; and 3.) promoting meaningful adoption. All three are best achieved through cross-industry cooperation in the development of voluntary consensus standards. Government mandates should

be avoided. Instead, policymakers should seek solutions to incentivize the development and adoption of voluntary standards.

## **Data Portability**

Question 9(c) asks “How does data portability, or lack thereof, factor into consumers keeping the same app if they switch from one operating system (iOS or Android) to another?” Similar to interoperability, giving consumers the ability to move their data from one service to another through data portability reduces friction and “switching costs.” Data portability ultimately benefits consumers through wider choices and more competition.

Data portability is already present in a wide range of applications and supported by voluntary consensus standards. For example, the Data Transfer Project was launched in 2018 to create an open-source, service-to-service data portability platform to help individuals easily move their data between online service providers whenever they want. The Data Transfer Project framework is used in portability tools at companies like Google and Meta. Importantly, data portability is often used as a competitive advantage to differentiate between products and services in the marketplace, a market that includes the mobile app ecosystem.

## **Conclusion**

Thank you for considering these supplemental comments. We look forward to collaborating with NTIA on data portability and interoperability issues moving forward. If you have any questions, please reach out to Matt Furlow at [mfurlow@uschamber.com](mailto:mfurlow@uschamber.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Matt Furlow', with a stylized flourish at the end.

Matt Furlow  
Policy Director  
Chamber Technology Engagement Center  
U.S. Chamber of Commerce