

Abuse of Dominance in Digital Markets: The Korea Fair Trade Commission's Google Play Store Decision

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This paper introduces the decision rendered by the Korea Fair Trade Commission regarding the Google Play Store Case in April 2023. Google Play Store dominates the market for Android-based app stores both domestically and globally. Upon the launch of One Store, an integrated app store of three mobile carriers and Korea's leading search engine Naver, Google devised a strategy aimed at securing exclusive release of games. The Commission determined that Google's action that limits multi-homing constitutes anticompetitive behavior, resulting in the exclusion of One Store from the competitive landscape.

Keywords: Abuse of dominance, Exclusive dealing, Multi-homing,
Online platform

JEL Classification: K0, L4

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The paper contains only public information regarding the case based on the KFTC press release (2023. 4. 12.) and the KFTC written resolution (No. 2023-103) (Case No. 2020^지감 1764). The views expressed are those of the author and not of the KFTC.

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I. Introduction

The advent of digital markets presents novel challenges to competition authorities. Online platforms function as intermediaries, facilitating interactions between distinct user groups, typically sellers and buyers. However, it is observed that the scope of their role often transcends mere facilitation, and a small number of platforms evolve into critical bottlenecks or gatekeepers, thereby controlling access to a significant user base. That is, digital markets tend to tip due to specific characteristics of online platforms, which give them monopoly power at the distribution level. The KFTC (Korea Fair Trade Commission) persistently addressed challenges associated with online platforms at many levels.

In January 2023, the KFTC issued the “Online Platform Abuse of Dominance Review Guideline” (KFTC press release, 2023. 1. 12.) in response to the distinctive characteristics exhibited by online platforms. Notably, the guideline seeks to accommodate features such as multi-sidedness, cross-network effects, economies of scale, the significance of data, and the prevalence of free services. While the existing review guideline is applicable to cases of abuse of dominance, the Commission, in instances involving online platforms, references the new guideline to delineate relevant markets, assess market power, and evaluate competitive effects. The guideline identifies four common types of abuses committed by online platform operators, namely limiting multi-homing, demanding Most Favored Nation (MFN) treatment, self-preferencing, and tying. It is important to note that the guideline does not consider these actions to be inherently illegal. Indeed, the guideline outlines a variety of efficiency rationales associated with such actions, including ensuring quality provision, promoting relationship-specific investment, and addressing free-riding problem. Nonetheless, the Commission recognizes that this type of conduct raises concerns that require careful investigation.

Also, there are growing number of enforcement cases initiated by the KFTC concerning online platforms. The purpose of this paper is to introduce the KFTC’s recent decision against Google. On April 11 2023, the KFTC announced its decision to impose a fine of 42.1 billion won (approximately 32 million US dollars) on Google, finding that Google abused its dominance in the market for app stores. The Commission determined that it is anticompetitive for Google to offer

marketing benefits to mobile game developers on the condition that they exclusively launched their titles on Google Play and refrained from releasing them on One Store, a rival app store.¹ Consequently, One Store encountered difficulties in securing new games, particularly popular ones, leading to a decline in its competitiveness as an app store. The actions taken by Google in this case fall under the category of “limiting multi-homing” as they discourage game developers from adopting a multi-homing strategy. The Commission concluded that Google’s conduct was exclusionary and anticompetitive.

The rest of paper is composed of five chapters. Chapter 2 describes the background of the case including industry characteristics and the strategic environments at the time of conduct. Chapter 3 defines the relevant market and assesses Google’s market power. Chapter 4 details the conduct and Chapter 5 discusses its competitive harms. Finally, Chapter 6 offers concluding remarks.

II. Background

A. App Stores

App stores act as marketplaces for applications (that is, apps), with Operating System (OS) developers typically offering app stores tailored for their respective OSs. In addition to OS developers, app stores are also provided by device manufacturers, mobile telecom companies, and certain platform companies (refer to Table 1). While OS developers are not the only suppliers of app stores, they serve as the primary channels for app distribution. Chapter 3 provides further details of app stores, including the definition of a relevant market.

¹ The duration of the conduct is about two years, from June 24, 2016 to April 21, 2018.

TABLE 1
APP STORES BY OPERATING ENTITY

Classification	App store examples (by)
OS developer	Google Play Store (Google), App Store (Apple), Windows Phone Store (Microsoft), Blackberry World (Blackberry), etc.
Device manufacturer	Galaxy Store (Samsung), Smart World (LG), HTC Marketplace (HTC), App Gallery (Huawei), etc.
Mobile carrier	One Store (SKT, KT, LGU+, Naver)
Others	Amazon Appstore (Amazon), etc.

Source: KFTC Decision (2023) <Table 6>

B. Launch of One Store

There are three major mobile telecom companies in Korea: SKT, KT and LG U Plus (LGU+). They individually operated their own app stores, which were pre-installed on the mobile devices they served. Naver, Korea's leading search engine and portal platform, also had its own app store. But these individual app stores faced considerable challenges in competing with Google Play. Recognizing the limitations of competing individually, the three domestic mobile carriers and Naver formulated a plan to integrate their respective app stores to compete effectively with Google Play. The initial phase of this integration occurred around March 2015, marked by the launch of the "ONE store service" that integrated the app store services of the three mobile carriers. Subsequently, Naver participated in the One Store project, leading to the official launch of One Store on June 1, 2016.

The introduction of One Store changed a competitive landscape for Android app distribution. First, One Store is pre-installed on all Android-based smartphones sold through domestic mobile carriers, which significantly enhanced consumer accessibility.² Furthermore, One Store implemented various marketing strategies and benefits, including

² Previously, users encountered a hurdle when attempting to install the Naver app store, as a warning of "unknown sources" would appear. To proceed with the installation, consumers were required to manually untick the warning. However, this issue was resolved, making it easier for consumers to access One Store.

cashback events, discounts tied to mobile carrier memberships, and coupons, to establish its foothold in the market. As high-value users (HVUs) who are known for substantial spending on games moved from Google Play to One Store in response, app developers focusing on domestic market found it advantageous to deal with One Store to secure these valuable users. Large game developers began considering to adopt a two-track approach, contemplating releases on a global scale through Google Play and domestically through One Store. Recognizing the potential threat posed by One Store, Google predicted a short-term decline in sales and expressed concern that the Android ecosystem may be challenged due to the large user pool of Naver services.

C. Mobile Games

The predominant distribution channel for mobile games is app stores. App stores such as Google Play and Apple's App Store typically charge 30% fee on apps and in-app purchases, and the game company keeps the remaining 70% of the amount paid by consumers. One Store lowered the basic commission rate from 30% to 20% in July 2018, and a 5% fee was charged if the developer's own payment method was used.

The mobile gaming industry has unique and important characteristics. Above all, games play a significant role for the survival of app stores because they are the primary source of revenue, contributing to over 90% of domestic sales in app stores.

When it comes to the performance trajectory of individual games, the initial weeks following launch are critical. The analysis of actual game data from Google Play revealed that downloads and sales were concentrated in the early periods after launch. On average, within the first month of launch, 59% of downloads and 28% of revenue for the year occur. Therefore, the early stages of a game's release are typically a critical time during which the game attracts the most users and generates the most sales. And once downloaded, more revenue can be generated through in-app purchases of game items and such, in the long run.

In addition, the mobile game industry is hit-driven in nature. A vast number of games are released daily, but only a select few developers and games are massively successful, accounting for most of sales. Korea has three major game developers whose games accounted for nearly half of the sales in the Google Play games sector from 2015 to

2018. Furthermore, the top 50 games by monthly sales on Google Play accounted for more than 70% of total consumer spending in the Google Play games sector, every year from 2015 to 2018.

Lastly, the mobile game industry has shown remarkable growth both domestically and internationally, with the increasing use of mobile devices. Korean mobile game developers began to pursue global expansion initiatives and the proportion of overseas sales has increased notably.

III. Relevant Market

Market definition is the process of identifying a set of close substitutes for the products in question. In abuse cases, market definition is trickier than merger cases where competition is unharmed. The standard Small but Significant Increase in Price (SSNIP) test assumes a 5%–10% price increase from the prevailing competitive price level. However, coming up with base price is difficult when competition is already lost and the current price moves away from the competitive level. In the Google Play Store case, a qualitative approach was adopted to determine the relevant market.

The relevant product market here is defined as the app stores for Android apps. Mobile OSs are basically dominated by Google's Android OS and Apple's iOS. As of 2019, Android and iOS account for 82.6% and 15.9% of the global smart mobile OS market, respectively. The commission observed that app stores designed for iOS apps and Android apps are distinct and separate markets. Google Play has consistently held the dominant position as a number one operator with an overwhelming market share among app stores for Android apps, both globally and domestically.

Google argued that the relevant market should include all distribution channels competing for the release of mobile games and other apps, including app stores designed for other OSs such as Apple's App Store. It is then argued that Google Play is competing fiercely not only with other app stores but also with other distribution channels such as direct download (sideloading), pre-installation, and cloud-based streaming services.

It is true that there are options for distributing Android apps, unlike iOS-based devices, where Apple's App Store is practically the only way to distribute apps. Technically speaking, sideloading is a possibility,

allowing users to download apps directly from the web or obtain app installation files from other users. Or, if an app developer holds bargaining power with device manufacturers, it can ensure that the app comes pre-installed on the devices. However, these other distribution methods are generally not considered viable alternatives to app stores and cannot really put any competitive pressure on them.

In addition, the Commission decided that an iOS app store is not deemed a close substitute, both on the user side and on the developer side. To begin with, users must incur significant costs to switch to Apple's App Store as they have to replace their mobile devices. Similarly, developers face substantial investment in terms of time and money to switch to an app store for iOS as they have to adjust their codes to make the apps work for a different OS. Due to the presence of considerable switching costs, even if the quality of app stores for Android deteriorates, it is very unlikely that they will completely leave the relevant app store and move to app stores for a different OS. Besides, since Android's share of the entire smart mobile OS is about 80%, it is viewed as unrealistic for app developers to forsake a market that accounts for such a significant share and move to a different market.

IV. Exclusive Dealing of Google Play Store with Game Developers

A. Overview

App stores are digital platforms that intermediate app transactions between app developers and users. They are two-sided markets that exhibit strong cross network effects. On the one side, users prefer the app stores with many games, especially popular ones. On the other side, game developers value the app stores with large user bases. However, the release of an app in one app store does not preclude its release in another app store. App developers can multi-home to reach as many users as possible. Google, however, was found to have particularly restricted game app developers from multi-homing on One Store.

The restriction of multi-homing basically falls under the category of exclusive dealing. It could be a unilaterally announced policy that was forced to users, but it could also be a product of bilateral negotiations and agreements. Such agreements may take the form of explicit

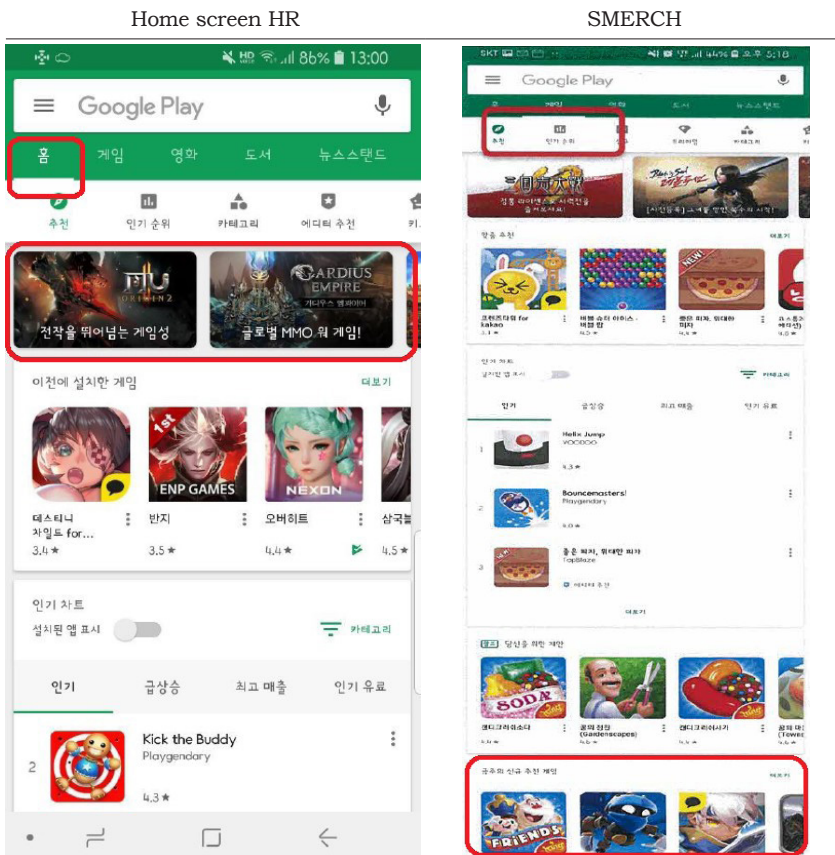
contracts or economic incentive provisions, where single-homing is encouraged through significant rewards, or multi-homing is discouraged through huge costs. In the Google Play Store case, the primary benefits offered by Google Play in exchange for exclusivity are getting an app featured in the app store and support for global expansion. The next section describes the marketing support given in return for exclusivity.

B. Featuring and Global Expansion Support

First, “getting featured” means that the app store operator displays a particular app in a prominent location on the app store screen to expose it to consumers. Since it enhances the app’s visibility, creating awareness to consumers, and at no cost, most game developers desire to be selected to get their apps featured and perceive it as a major marketing tool.

Google Play explained that it offers about 20 types of featuring, some of which were automatically featured, for instance, based on algorithms, while others were manually determined by humans. It is the latter case that we are interested in. The main types of featuring supported by Google Play can be divided into several type depending on the position where the app is featured and whether it is pinned or not.

For example, Highlight Row (HR) refers to the part that appears large at the top banner of the Google Play home screen. The left panel in Figure 1 is the first screen that appears when a user accesses Google Play, referred to as the “Home Screen” or “Apps Home.” The home screen displays not only games but also various non-game apps. Similar HR banners appear in the games screen (“Games Home”) too, except it only features games. HR banners show only one or two apps, but you can click left and right to see other apps featured in that banner. If all the featured apps are always visible to all users in the banner, it is called “pinned.” By contrast, if featured apps are displayed in a different order based on the user’s interests and preferences, they are called “unpinned.” Now, if you scroll down the screen a bit, you will find a banner showing this week’s new recommended games, as in the right panel of Figure 1. This type of featuring is referred to as SMERCH, and it is designated for new releases. SMERCH shows 4 apps first, and you have to press “More” to see the next featured apps. Apps that appear first are pinned, while apps that only appear when you click “More” are considered unpinned.



Source: KFTC Decision (2023) <Table 18> left panel (HR), <Table 19> left panel (SMERCH)

FIGURE 1
HIGHLIGHT ROW (HR) BANNER FEATURING AND SMERCH

Additionally, “Featuring Pre-registration campaign” promotes upcoming games and receives pre-orders. Games available for pre-registration will be posted in HR banner or pre-registration category. Pre-registered users will be notified immediately after the game launches.

As for global expansion support, Google Play operates globally and can provide featuring and consulting support overseas.

C. Exclusive-Release Conditional Support Strategy

The case dates back to around June 2016, a period shortly after the launch of One Store. One Store soon emerged as a strong competitor. At that time, Google became aware that a major game developer intended to release a blockbuster game, Game A, not only on Google Play but also on One Store simultaneously. To countermeasure the plan, Google offered an extensive support package involving featuring and global expansion support on the condition that the game would not be released on One Store. As a result, the game company opted to forego the initially planned simultaneous launch and, instead, released Game A exclusively on Google Play.

Building on the success of the exclusive release of Game A, Google formed a comprehensive exclusive-release conditional support strategy (POPF³ strategy) for the mobile games and developers around July 2016 and then implemented it. In essence, it was a strategy carefully designed to prevent new games from being released on One Store by providing game developers with strong marketing benefits such as featuring and global expansion support, contingent upon the condition that the game would be released exclusively on Google Play.

In particular, game developers were evaluated and classified into tiers⁴ according to their sales contribution, potential risk of simultaneous launch on One Store, and so on. Google established a differentiated support scheme for each tier. For example, Top 4 is the top tier comprising the top four game developers with the highest percentage of sales on Google Play. Recognizing that these developers were actively seeking overseas expansion, Google set an all-out defense strategy against their potential releases on One Store. Specifically, Google planned to provide them with support for overseas expansion, co-marketing, and featuring on the condition of exclusive launch on Google Play. The primary goal was to assure that the game developers, especially top developers are committed that they would not launch

³ Here, exclusive release refers to launching the game only on Google Play for the entire lifetime of the game, which is called "Play-only" or "Play-exclusive", or for a certain period, which is called "Play-first," within the Android ecosystem.

⁴ Google classified domestic games companies into six tiers - Top 4, MM (Mobile Majors) -Tier 2, MM-China, MM-Other, Indie, AAA game companies (major PC game-oriented game developers seeking mobile presence). Google formed a support strategy tailored to each tier except for indie game companies.

their games on One Store.

At the game level, Google also made efforts to secure the exclusive release of strategic titles anticipated to bring significant impact. In particular, Google selected most important game, termed as P0 (top priority) titles, among newly released games, and had given special care to secure the exclusive launches of these P0 titles on Google Play.

V. Competitive Harm

Does the use of exclusive dealing by Google constitute an abuse of a dominant position? This chapter goes over the mechanisms through which Google's conduct harm competition and the resultant market outcomes.

A. Offer that One Cannot Refuse

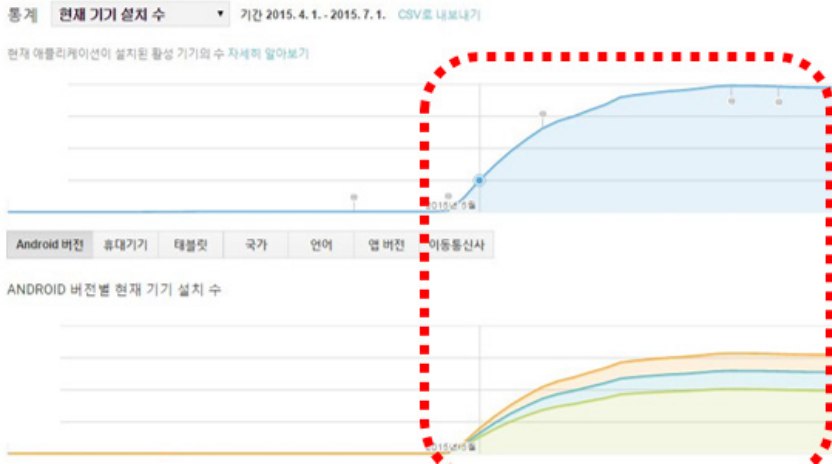
Google provided economic incentives to game developers, including featuring and support for overseas expansion, as a means of inducing game developers to release their games exclusively on Google Play. And the terms of exclusivity were not stipulated in a written contract and were not legally binding. Thus, Google's actions may seem harmless as they offer benefits to game developers and are based on consensus, at least on the surface.

However, an exclusive dealing does not necessarily have to be contractual or legally enforceable to be found anticompetitive. Also, it does not need to involve penalties for non-compliance; rather, it can take on an incentive-based structure where compliance with exclusivity condition is rewarded.⁵ For example, loyalty discounts offer price discounts when you purchase more than a certain quantity, but they can be exclusionary and anticompetitive. This is because, although the degree of competitive harm may be less, giving benefits can be just as effective as imposing penalties in inducing developers to take the exclusive deal. Given Google's dominant position in the domestic and international market and the anticipated marketing support for exclusive releases, the Commission determined that game developers were bound to accept the offer.

⁵ In fact, the economic theories of anticompetitive exclusive dealing consider voluntary agreements between the parties.

First of all, Google Play featuring is a highly effective means of exposing games to consumers and has a positive impact on game performance. With so many games released in an app store every day, game developers are keen on ensuring effective exposure of their games to consumers at launch, especially before and right after release. Featured apps are exposed to organic users who are interested in games and access an app store, making the promotion targeted. Since the featuring banners occupy a significant portion of the screen, it is especially advantageous in capturing user attention in a mobile setting with small screens. Furthermore, featuring is known to be effective in cultivating the perception that a game is trendy and widely popular. The pre-registration campaign builds up a user pool even before the game is released, so the game is much better positioned than other new games starting from the scratch. If the number of users increases rapidly through pre-registration, it can lead to an increase in the game’s popularity and sales ranking, which can lead to additional customer acquisition, creating a virtuous cycle.

Both Google and game developers were well aware of the positive impact of featuring. Figure 2 illustrates the impact of featuring,



Source: KFTC Press Release (2023. 4. 11.), KFTC Press Release (2023. 4. 11.)

FIGURE 2
CHANGE IN DOWNLOADS AFTER GETTING FEATURED BY GOOGLE PLAY (MAJOR GAME DEVELOPER F)

as internally analyzed by a major game developer: the number of downloads significantly increased after the game gets featured. An empirical analysis of the effect of featuring on downloads and sales using Google Play data confirmed that featuring improved the game's performance significantly.

Google were aware that game developers considered featuring more important than other methods for app exposure such as search or advertising, and that developers felt disadvantaged if they did not get featured. Since the relevant data was not transparently disclosed by Google Play to game developers, at one point, Google mentioned in an internal document that it could be the case that game developers might even be overestimating the impact of featuring.

Google claimed that the effect of featuring was exaggerated. But even if that is true, the point remains that as long as the game developer believes in the effectiveness of the featuring and wants it, the promise of featuring is effective in enticing developers to launch exclusively on Google Play.

Support for global expansion also matters. Google Play operates globally and can provide featuring and consulting support in overseas. Major game developers believed that getting featured on Google Play Store was important for the success of their overseas expansion. Given that domestic game developers and their titles often lack recognition abroad, they were reliant on Google Play who has a dominant market share globally. Google, knowing that game developers recognized support for global expansion as useful and important, presented it to the developers as a bargaining chip on the condition of exclusive release on Google Play.

In the end, the sheer market dominance wielded by Google afforded them the ability to influence and, in effect, coerce game developers into agreeing to exclusivity. Even if the exclusivity offer itself might not have been compelling enough to forgo launching on One Store, the game developers likely sought to maintain an ongoing and cooperative relationship with Google.

B. Contractual Externalities and "Divide and Conquer"

When a mobile game developer contemplates the release of a game on Android-based app stores, the default choice often involves launching the game on Google Play, given its significantly larger user base than

any other app stores. Then, the real decision is often whether to adopt a single-homing strategy exclusively on Google Play or to opt for a multi-homing approach by also entering One Store.

For games developers, multi-homing can be an appealing option in many cases. Google's own assessment acknowledged that One Store had a dedicated user base comprising males in their 30s and 40s who enjoy RPG games and martial arts. Since these users are a highly profitable group that spends substantially on games, it is recognized that there is a strong incentive for game developers to release games on One Store especially when they are the main target customers. For highly anticipated games, multi-homing can be pursued to reach a broader user base and enhance overall revenue. The relatively modest resource requirements associated with multi-homing contribute to its appeal. The additional development costs for entry into One Store are perceived as minimal, both in terms of money and time. In addition, it is believed that the incentive for multi-homing will be greater for larger game developers as they have more programmers and so there is less burden associated with multi-homing.

By inducing games to be launched exclusively on Google Play, Google effectively hinders One Store from acquiring crucial game titles. This strategy is cost-effective for Google due to the presence of contractual externalities. If Google secures exclusive releases of top titles from major game developers, other developers will likely have no choice but to accept Google's exclusive terms, even with little or no compensation. The latter is due to the fact that other game developers come to form a belief that One Store may not be a viable app store, irrespective of their choice to engage in multi-homing. It is especially so in this case because Google concentrated its efforts on securing strategic game titles anticipated to have a big impact, critical for the survival of an app store. From the Google's point of view, it does not have to be a complete foreclosure to exclude One Store from the market. Google can expect a sufficient exclusionary effect by preventing highly profitable game titles from going to One Store, impeding One Store's ability to attract a substantial user base and generate sufficient revenue, impeding its growth and competitiveness in the market.

The above theory of competitive harm is consistent with the so-called "divide and conquer" strategy identified by Rasmussen *et al.* (1991) and Segal and Whinston (2000). Rasmussen *et al.* (1991) demonstrated that, in the presence of a minimum efficient scale, an incumbent can

block the entry of competitors even if it enters into an exclusive dealing with only a few buyers. This strategic approach relies on the existence of contractual externalities, where the decisions of individual buyers are interdependent. When other buyers are expected to accept exclusive contracts, they may also opt for exclusivity, despite recognizing the benefits of competition. It is particularly so when differentiated offers can be made for different buyers, in a sequential fashion. Thus, purely anticompetitive exclusive dealings, that is, naked exclusion can occur without incurring substantial costs.

In the market for app stores, cross-network effects give rise to contractual externalities. App stores are two-sided markets in nature, with users on one side and app developers on the other side. And cross-network effects arise in which app developers attract users and users attract app developers. As the number of app developers entering the app store increases, users benefit from being able to consume a variety of content, and as the number of users increases, app developers benefit from increased sales. In other words, developers and consumers see gains or losses depending on the number of users on opposite sides of the app store. This cross-network effect becomes the driving force behind the growth of an app store as a platform.

Google argued that, despite its dominant market share, its competitive advantage is based on merits and must be protected and that competition to secure exclusive releases is a widespread form of competition in the content distribution industry and is a part of legitimate competition to secure contracts. It is true that “competition for the market,” that is, competition to achieve exclusivity can be pro-competitive. It works in theory, but it seems unlikely in this market. One Store, with its limited market presence, faces substantial challenges in countering Google’s exclusive offers. Given Google Play’s dominant market share, One Store would need to provide significant compensation to game developers for potential lost sales on Google Play. Consequently, it is doubtful for One Store to be able to compete effectively because it will be very hard to attract developers and thus users.

The online platform abuse of dominance review guideline recognizes that restrictions on multihoming may generate efficiencies by encouraging relationship-specific investments and preventing vendors on the online platform from free-riding on the online platform operator’s promotional efforts. However, the Commission concluded

that, in this particular case, the positive effects on efficiency and welfare enhancement are not substantial enough to outweigh the anticompetitive effects.

C. Exclusion of Rivals

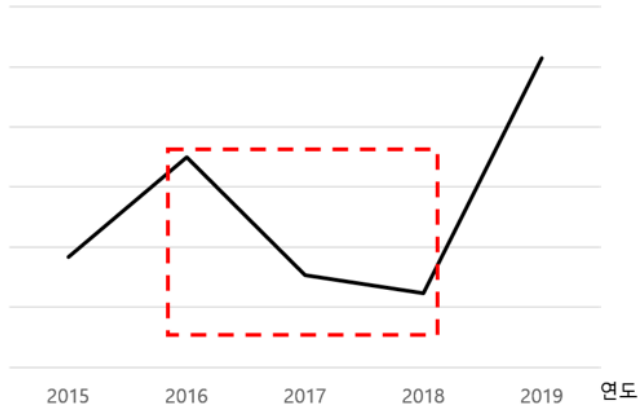
As a result, One Store suffered great difficulty in securing new releases. First of all, it was confirmed through numerous episodes that the plan to launch on One Store had to be abandoned due to Google's POPF strategy.

According to an empirical analysis of the proportion of games simultaneously released on One Store before and during the conduct in this case, the proportion of Sim-Ships (simultaneous shipments) decreased significantly both statistically and economically. This trend was especially evident in top 50 games. The result implies that the actions of Google influenced the game developers' choice of multi-homing.

In particular, large-scale games were most affected. Specifically, 94% of large-scale games from major Korean game developers were released exclusively on Google Play; whereas it was 50% prior to the conduct. These major developers account for around 80% or more of the revenue on Google Play. For the mega-hit titles classified as P0 titles by Google Play, the pattern is more pronounced, as all of them were exclusively released on Play Store during the conduct period.

Major, popular games create huge revenue. Having those games also speaks to people about the status of an app store as a platform. With One Store unable to secure top game titles, it faced a decline in both sales and user base. The number of paying users decreased on One Store, resulting in a negative cross-network effect that made it more difficult for One Store to attract games. Specifically, the number of paying users for games on One Store fell by more than half, while on Google Play, they increased by about 30%. Figure 3 shows that consumer spending on One Store decreased and the annual growth rate was negative in 2017 and 2018.

During the conduct period, Google's market share increased from 80%–85% to over 90%, whereas One Store's share declined as much. That is, Google's dominant position in the market was further strengthened.



Source: KFTC Press Release (2023. 4. 11.)

FIGURE 3
CONSUMER SPENDING ON ONE STORE

VI. Concluding Remarks

This paper provides an overview of the recent decision by KFTC against Google, offering insights into the impact of practices that restrict multi-homing in digital markets. When network externalities exist, exclusive deals can be achieved cheaply and easily by an incumbent holding dominant market share. In particular, considering that mobile games are hit-driven in nature and early periods of release is crucial, Google's strategy to ensure exclusive launches of strategic game titles from major developers can seriously damage the business prospect of new entrants.

Google's utilization of economic incentives to encourage game developers to choose single-homing has been found to be a practice that distorts competition among app stores, hindering the entry of One Store as an effective competitor into the market.

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