

Failure of the Informant to identify the individual responsible for development of the impugned application leaves open the crucial issue as to whether the application was developed by a contractual developer or an internal employee

The **Competition Commission of India** in the case of **Zucol Solutions Private Limited v. Google India Private Limited [Case No. 17 of 2025]** dated **March 24, 2026**, has identified the relevant market as the “market for app stores for Android OS in India” and observed that Google holds a dominant position in the market. The Commission noted contradictions in the informant's submissions, as it later admitted that the app was published under its developer account, despite earlier claiming that it did not belong to it, raising doubt on the credibility of its claims. “No name, identity, or documentary evidence of the alleged contractual arrangement have been provided, nor has any timeline been furnished with respect to the commencement or termination of the said engagement.

In this case, the Informant, Zucol Solutions Pvt Ltd, engaged in digital software development and mobile application services, had created a Google Developer Account (GDA) to list its mobile applications on the Google Play Store. In September 2023, Google terminated the Informant's GPA citing policy violations linked to the app “Pobreflix – Series, Movies.” The informant claimed the app was developed by an external contractual developer and not attributable to it, and that despite requesting action only against the said app, Google terminated the entire account without any reasonable justification.

A second developer account created by the informant in May 2024 to list a single app called “BTHAWK”, was also terminated for being linked to the first account. The informant alleged arbitrary action and denial of market access, particularly as it had been warned against creating new accounts. Aggrieved, the informant approached the CCI alleging abuse of dominant position and seeking investigation, reinstatement of accounts, and Rs. 57 crore compensation.

The CCI observed that the failure of the Informant to identify the individual responsible for development of the impugned application leaves open the crucial issue as to whether the application was developed by a contractual developer or an internal employee. The Commission also observed that the Informant suppressed material facts, including reinstatement of its first account by Google, details of the contractual developer, complete communications with Google, existence of a third account and an email to the Ministry of Electronics and IT referring to termination of an internal employee.

The Commission noted that, in the entire sequence of events, the Informant has not been forthcoming with complete information, has attempted to repeatedly open new and related accounts, despite being warned against the same by the OP, having been eventually terminated as per Relation Ban Policy and has not resubmitted its apps even after the First Account was reinstated by the OP. Accordingly, the CCI closed an abuse of dominance complaint against Google India Pvt Ltd. over termination of a developer's Play Store accounts and alleged denial of market access, finding no prima facie contravention of Section 4 of the Competition Act.