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Consultation Response on Structural Exit, Residual Dependency and Intervention Effectiveness in Microsoft's Business Software Ecosystem

Response to the Proposed Decision and the indicative Roadmap published on 16 October 2026 in the SMS investigation into Microsoft's Business Software Ecosystem (Part 1, Digital Markets, Competition and Consumers Act 2024). Made on the same record as the information provision of 31 August 2026, which is unchanged: no value is revised and no score is recomputed. The response asks one measurement question relevant to intervention design and review: how to determine whether an intervention or substitution has materially reduced the dependency it targets rather than changed its form.

Status: Non-confidential in its entirety; may be published in full.

Submitted by: Ivan Savich, Creator of the Black Hole Index (independent researcher)

Case: SMS investigation into Microsoft's business software ecosystem (Investigation Notice, 14 May 2026); consultation on the Proposed Decision and Roadmap of 16 October 2026, closing 17:00 UK time on 13 November 2026

Relationship to the record: made on the same record as the information provision of 31 August 2026 (SHA-256 58c18fa8...), which is unchanged; no value revised, no score recomputed

This document: a supplementary measurement approach for assessing residual dependency before and after an intervention or substitution; no view on designation; no legal conclusion

Independence: no commercial relationship with, and no funding from, Microsoft or any party with an interest in this investigation

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1. Introduction and purpose

1.1. I am the Creator of the Black Hole Index (BHI), an open measurement instrument for structural lock-in on digital platforms. On 31 August 2026 I provided the case team, unsolicited, with a structural profile of Microsoft's integrated business-software stack as consumed by one stipulated UK enterprise, read from first-party documentation under a frame frozen before any evidence was gathered. [1] That document is unchanged by this response. No value in it is revised, no parameter is rescored and no composite is computed.

1.2. This response has a narrower purpose than the August record. The Proposed Decision and its appendices now contain customer, market and internal evidence of a class the August record expressly identified as outside its own evidence, namely evidence of what customers can in practice do when they try to move a component away from Microsoft. [1, section 7.3] I do not use that evidence to revisit the August measurement. I use it to ask one measurement question relevant to the Roadmap's invitation to comment on possible intervention options: how should the CMA determine whether a future intervention or substitution has materially reduced the dependency it targets, rather than changed the form in which that dependency is expressed? [5, paragraph 5.1(c)]

1.3. The response is organised as follows. Section 2 states what the August record found and did not find. Section 3 identifies the parts of the CMA's record that bear on the question. Section 4 proposes a supple-

mentary measurement approach, a residual-dependency assessment, with its baseline and post-event logic. Section 5 applies it to the distinction between formal implementation and structural outcome, using the communication-and-collaboration case the Roadmap discusses, and states a prospective note on AI agents. Section 6 sets out evidence and implementation considerations. Section 7 states limitations. Section 8 concludes. An appendix crosswalks the August propositions against the CMA record.

1.4. Nothing in this response is a view on whether Microsoft has, or should be designated as having, strategic market status, and nothing in it establishes market power, dominance, abuse or harm. The proposed approach does not treat integration as harmful; it is designed to tell integration benefits apart from residual dependency.

2. Relationship to the 31 August record

2.1. The August record asked one question raised by the Notice's ecosystem framing: whether integration across the products creates structural dependence greater than the sum of the products taken separately. It answered that question for one stipulated enterprise from provider documentation only. Eight of eleven parameters carried a value; closeness, human fallback and momentum were Not Scorable; no composite score was computed; the eight scored rows were produced by a single evaluator whose anchoring exposure was declared and realised, and the instrument's inter-rater reliability is not established. [1, sections 2.1, 7.1 and 7.2]

2.2. The frozen result was narrower than a general conclusion. On the capture side the integration increments were positive where decidable: at full perimeter, data +2, memory +1, network +1 and action +1 conditionally; at investigation scope, data +2, memory +1, network +1 and action zero; within the Notice's five activities, data +2 and network +1 only. On the escape side the reading of record carried no positive integration increment on portability or on substitutability: the documented conditions attached surfaces, roles, sequencing and federation to a component exit without removing a substitute or closing an export path. A reading registered after scoring, printed beside the record and co-equal with it, would read one step lower on each escape parameter. [1, sections 2.2, 4.2 and 4.3]

2.3. The August record did not establish quantitative super-additivity of dependence, did not claim that the stipulated enterprise represents the market, and did not claim that a Microsoft customer cannot exit. It defined a completed stack exit in advance, with the consequence that an export capability is not an exit, and recorded per component the documented position for replacing that component alone while the rest of the stack remains. Nine of ten components showed a documented condition attached to another component on exit; the identity root was retained by the perimeter's own membership criterion and was frontable, with replacement not evidenced on the record either way. [1, sections 3.3, 3.4 and 4.2] The twelve-month horizon and the contracted-assistance ceiling in that definition were stipulations of the research frame. I do not propose them as regulatory thresholds.

2.4. The record also stated its own evidential limit: it read published documentation, not behaviour, and whether the stipulated customer could in practice complete the defined exit was a question for customer-state evidence, which the CMA's qualitative customer research was placed to gather and the record was not. [1, section 7.3] That limit is the starting point of this response.

3. What the CMA's record adds

3.1. The Proposed Decision provisionally finds that considering Microsoft's market power in its individual digital activities only "would miss its key strength which is to offer an integrated suite of products which is broader than that of its competitors", that its positions in each digital activity "are mutually reinforc-

ing", and that barriers compound "when customers buy from more than one digital activity"; its provisional view is that Microsoft's position in each digital activity "mutually reinforces its position across its Business Software Ecosystem". [2, paragraph 5.153, page 143; paragraph 5.179, page 153; paragraph 5.198, page 160] The published record therefore independently addresses, as a matter of qualitative cross-activity reinforcement, the question the August record examined by measurement. This does not validate the BHI methodology and does not establish quantitative super-additivity under BHI; the two records answer different questions with different evidence.

3.2. The customer-side evidence is the part of the record the August measurement could not reach. The CMA finds that switching barriers "arise from application, data, workflow and technical dependencies that become embedded within customer environments over time". [2, paragraph 5.178, page 152] Implementation costs for productivity and security software require customers "to recreate permissions structures, security policies, and to redesign processes that have become integrated with other Microsoft products". [2, paragraph 5.176(c), page 152] The customer research found that separating one Microsoft component "was seen to add administrative time (e.g. extra logins, duplicated provisioning and governance, reworking permissions etc)". [2, paragraph 4.239, page 97] One customer that would prefer to move all of its Windows Server and SQL Server business to alternative providers expected instead to "use a hybrid approach and retain some of its Microsoft compute services" because of its enterprise agreement. [2, paragraph 4.244, page 98] Another retained Defender alongside a third-party product "in part because Defender had access to Microsoft's telemetry data". [3, paragraph A.162(c), page 57]

3.3. Microsoft's own account, as the CMA reports it, frames the same situation from the other side. Microsoft submitted that switching from its productivity suite "is primarily a data migration exercise" and that customers "can decide to switch individual services while retaining others". [3, paragraph A.96, page 32] On identity, Microsoft told the CMA that a third-party identity and access management tool "can only be used alongside Entra ID" on Microsoft cloud services, that this design "is standard across major cloud platforms", and that "it was Entra ID that ultimately authorised the user". [3, paragraph A.157, page 54] Microsoft told the CMA that a centralised identity architecture which federates with third-party services is the standard framework; the CMA records that this accords with its understanding of identity and access management as a critical and centralised function, and it states that all of the Microsoft products in the five digital activities are integrated with Microsoft's identity products and that "Entra ID is required to log in on any of Microsoft's cloud-based business software, including Microsoft 365". [2, paragraphs 4.200 to 4.202, page 88]

3.4. These passages describe, from three directions, a single state: a component has been nominally substituted, exported from, or run alongside a rival, and some incumbent-controlled element remains necessary for the substituted function to operate. The record describes that state in prose, and different speakers attribute it differently: the CMA to integration between Microsoft's products and to third-party applications, Microsoft to customers' own architecture and application choices, and one customer to the difference between legacy and modern architectures. [2, paragraphs 5.172 and 5.176, pages 150 and 151; paragraph 5.158, footnote 644, page 144; footnote 481, page 101] The record also describes, in the CMA's own words, what remains after a move: customers who switch some SQL Server workloads "often remain reliant on SQL Server for some workloads due to, for example, COTS application dependencies", organisations "may continue to rely on on-premises Active Directory for IAM" even where other workloads have migrated to the cloud, and alternatives "are often used alongside Microsoft as complements rather than substitutes". [2, paragraph 5.136, page 139; paragraph 4.203, pages 88 and 89; paragraph 5.93, page 129] In the two places where the record refers to the outcome of a remedy, the Teams commitments and the cloud-services actions, it uses observed switching and multi-homing as the indicators. [5, paragraph 4.26, page 24; 2, paragraph 2.30, page 18; paragraph 5.216(b), page 167] What I have not found in the Proposed

Decision, Appendices A to D or the Roadmap is a definition of when a substitution is complete, a record of which incumbent-controlled elements remain necessary after it, a comparison of that record before and after an intervention, or a classification of the remaining elements by cause and materiality.

3.5. Appendix A repeatedly describes coexistence or parallel operation as an observed state in several switching contexts across the five activities, most fully in Security Software and Server OS. The CMA observes that a customer may use a rival identity product for non-Microsoft applications and on-premises directories while "retaining Entra ID for Microsoft workloads", and that the security software of Microsoft and of alternative providers "are often complementary, rather than fully substitutable". [3, paragraph A.150, pages 52 and 53] Three alternative providers estimated that "between 95-100% of customers used their products concurrently with Microsoft ones". [3, paragraph A.195(a), page 67] Microsoft submitted that switching between security solutions "typically occurs through parallel operation and incremental transition". [3, paragraph A.176, page 61] For databases, none of the providers the CMA asked "systematically track switching from SQL Server to their RDBMS products". [3, paragraph A.346(e), page 127] Coexistence is therefore a state the record describes often. What the record does not contain is a way of stating which dependencies a coexisting arrangement leaves in place, whether they are material, and whether they changed after an intervention.

3.6. The customer-level data analysis gives the question its scope. Customers purchasing products in all five digital activities account for a small share of customers by number and the large majority of revenue, with an average spend in the hundreds of thousands of dollars; the CMA notes that the very large customers tend to purchase across all five activities, and states the dataset's limitations. [4, paragraphs B.18 and B.21, pages 5 and 6; paragraphs B.31 to B.35, pages 9 and 10] Revenue concentration does not by itself demonstrate structural dependence, and large organisations may buy more categories because they are large. I rely on the analysis only to the extent that the customers for whom a residual-dependency assessment matters most are economically material in the CMA's own data.

4. Structural exit and residual dependency: a supplementary measurement approach

4.1. The measurement question. A question that remains for intervention design is not whether a Microsoft component can nominally be unbundled, substituted, exported from or accessed through an interface. It is whether, after the relevant intervention or substitution has been implemented, the customer's substituted function operates in production with materially fewer incumbent-controlled dependencies than before. I suggest distinguishing formal implementation from structural outcome by recording residual dependency after substitution: which identity, data, permission, policy, telemetry, administration, workflow, application, security or commercial elements remain necessary for the substituted function to operate.

4.2. Unit of analysis. One business function, one substituted or separated component, one customer environment. The function is defined first, as the production capability that must remain available, for example authenticated access to line-of-business applications, document collaboration with external parties, endpoint compliance enforcement, or threat detection on servers. The component is the Microsoft product, service or functionality that is being replaced, separated or multi-homed. The environment is a real customer estate or a cohort of estates defined by dependency state, not by customer label.

4.3. Baseline state. Before the event, the assessment records which dependencies the function has on each component of the estate, with direction. A dependency of A on B is not a dependency of B on A, and the record keeps the direction where the evidence supports it. The baseline also records which dependencies are generic to any enterprise migration, which arise from the customer's own architecture or legacy choices, which arise from third-party applications, and which arise from the incumbent's design.

The CMA's record already contains material that would fall to be classified in this way, and in several cases the classification would be mixed: retraining and user familiarity carry a generic migration component; legacy coupling to Active Directory, which one customer distinguished from modern architectures, may reflect historic integration, application architecture and the customer's own choices together; sector applications that require Windows Server or SQL Server carry a third-party component; a tenant object retained because Microsoft products require it is incumbent-specific. [2, paragraph 5.174, page 150; footnote 481, page 101; paragraph 5.172 and footnote 670, page 150; paragraph 4.201, page 88]

4.4. Event. The substitution, separation, multi-homing or intervention is dated and described: what was unbundled, which interface was opened, which data was exported, which component was replaced, and what was retained in parallel during transition.

4.5. Post-event state. After the event, the same dependency record is taken again. For each element that remains necessary for the substituted function to operate in production, the assessment records the dependency class (identity, directory, authentication, permissions, policy, data, metadata, organisational context, telemetry, administration, deployment, application compatibility, security, workflow, interface, control plane, licensing or commercial relationship), its direction, whether it is incumbent-controlled or incumbent-specific, and whether the customer could remove it by its own action at proportionate cost.

4.6. Attribution. Each residual dependency is classified as generic migration burden, incumbent-specific, customer-created or legacy, third-party application, or mixed, with a stated confidence. The assessment does not infer intent. A dependency may have several causes; the record does not force it into one.

4.7. Asymmetry. Where a residual dependency is presented as competition-relevant, the assessment records whether the incumbent's own equivalent functionality is subject to the same interface, data-access, rate-limit, policy, approval, notice, identity, telemetry or administrative constraint as the alternative provider's. A burden that applies equally to all providers may still create switching friction; it is recorded as symmetric and is not characterised as an incumbent-specific asymmetry.

4.8. Materiality. Each residual dependency is classified as material, potentially material, immaterial or not testable, by reference to production functionality, business continuity, the switching decision or its cost, interoperability outcome, rival functional equivalence, or the intervention's objective. A retained free identity object used only to sign in to a residual Microsoft product may be immaterial where it performs no gating function for policy or device management; a duplicate licence that the customer must keep paying may be material where its cost bears on the switching decision; retained storage of collaboration history in the incumbent's mailboxes and sites after a collaboration tool is replaced may be material to continuity of records. In each case the classification follows from the evidence and the intervention's objective, not from the example.

4.9. Efficiency. For each mechanism the assessment records the benefit the customer obtains from integration, so that the benefit and the residual dependency are visible side by side and neither is inferred from the other. Common identity reduces administration; shared telemetry can improve detection; suite integration improves usability; shared organisational context can improve the quality of AI assistance. The CMA's record documents each of these benefits from Microsoft's submissions and from customers. [2, paragraph 5.180, pages 153 and 154; paragraph 4.239, page 97; paragraph 4.61(c), page 48] The counterfactual question is whether equivalent customer value would persist under a design in which the substituted function operates without the residual dependency, and that question is answered per function and per dependency, not in the aggregate.

4.10. Outcome classification. The observed change between baseline and post-event state is classified, provisionally, as one of: complete structural exit (the function operates on the substitute with no material

residual dependency on the incumbent); coexistence, or partial structural exit (the function itself remains divided between incumbent and substitute, by workload, user group or site); substitution with material residual dependency (the function is performed by the substitute but cannot operate in production without an incumbent-controlled prerequisite); no material structural change; or not testable. The classes are exclusive by a precedence rule: where the function is divided, the case is coexistence, and the residual dependencies of the substituted part are recorded within it. The labels are provisional and a more neutral taxonomy may serve the CMA better. No composite score is produced; the change is expressed as the difference between two classified lists.

4.11. What the approach does not do. It does not treat integration as the problem, it does not define a dependency as harmful, and it does not conclude that an intervention has failed because switching is low. It produces a structured record that allows the CMA to say whether the dependency an intervention targeted has changed, and in what respect, with attribution and materiality visible rather than assumed.

5. Formal implementation and structural outcome

5.1. The Roadmap records that the European Commission accepted commitments in September 2025 covering unbundling of Teams from the Microsoft 365 suite, price differences between bundled and unbundled offers, discount safeguards, interoperability measures and data portability, and that customer evidence considered to date "does not indicate significant switching from Teams to rivals since Microsoft's changes following the EC commitments". [5, paragraph 4.23, pages 23 and 24; paragraph 4.26, page 24] The same paragraph records that customers valued Teams for being integrated with the rest of the suite, even where they saw it as sufficient rather than best-in-class, and that a large minority used Zoom and Slack in addition to Teams. None of the commitments applies formally in the UK; the Roadmap records that the changes have been rolled out globally on a voluntary basis with additional guarantees for customers in the European Economic Area, and the Proposed Decision records that Microsoft has extended the first of the obligations, the offer of suites without Teams at price differentials, worldwide on a voluntary basis. [5, paragraph 4.23, pages 23 and 24; paragraph 4.27, pages 24 and 25; 2, paragraph 5.217(a), page 168]

5.2. Three readings of that evidence are consistent with it. Customers may prefer Teams on quality or convenience; network effects may persist independently of the commitments; or the function may remain structurally dependent on incumbent-controlled elements in ways the commitments did not reach, so that a nominal substitution would leave the collaboration function running on the incumbent's identity, storage and administration layers. Observed switching does not distinguish these readings, and effects may take time. A residual-dependency record for a cohort of customers that adopted a rival collaboration tool after the commitments would distinguish them: if the rival tool operates in production with no material residual dependency on the incumbent beyond what any multi-vendor estate carries, that finding would weigh against residual structural dependency as the explanation for low switching, leaving commercial, behavioural, network and other customer-side explanations to be assessed on their own evidence; if the rival tool's files, calendar, guest access, compliance records or administration remain necessarily on the incumbent's planes, material residual dependency remains, and whether structural dependence has nevertheless declined is determined by the comparison of the baseline and post-event records. The August record found, from documentation, that nine of ten components carried a documented condition on another component on exit; it did not observe any customer's state. [1, section 4.2]

5.3. The same distinction applies to the security case the Roadmap identifies. Microsoft states that customers can deploy third-party endpoint protection, detection or monitoring products as their primary controls. [3, paragraph A.156, page 54] A customer that does so and retains the incumbent's product alongside the rival in part because of the incumbent's access to telemetry has implemented a substitution

whose structural outcome is coexistence with a residual dependency on telemetry, material or not according to what the retained product still does in production; equivalent signal access would remove the telemetry-related residual dependency; a complete structural exit for the function would further require that no other material residual dependency remains, for example on the identity plane, policy, administration or permissions. The CMA's record contains a case of the first kind. [3, paragraph A.162(c), page 57] A parity intervention of the kind the Roadmap describes would be assessed, on this approach, by whether the telemetry-related residual dependency disappears from the record for a cohort, and by what else remains, not by whether the interface exists. [5, paragraph 4.33, page 26]

5.4. A prospective note on AI agents. The Proposed Decision records Microsoft's descriptions of Work IQ as creating "the most valuable stateful agent for every organization" and of Agent 365 as "the control plane for AI agents", and notes that customer evidence on Agent 365 is limited to date. [2, paragraphs 4.70, 4.75 and 4.76, pages 50 to 52] For the residual-dependency record this adds one prospective dependency class, operational state: agent identity and permissions, configuration, policies, audit history and accumulated organisational context. The benchmark for that class is functional reconstructability, whether the customer can continue the business process after changing provider or control plane, not literal transfer of the incumbent's internal state, some of which should not be portable. I make no claim of present-day lock-in; I suggest only that the class be recorded from the outset so that a baseline exists.

6. Evidence and implementation considerations

6.1. Evidence classes. The approach needs customer-state evidence: identity and directory configuration, policy and permission inventories, telemetry routing, administration and deployment inventories, licence schedules, migration-project records and, for the substitute, the prerequisites stated in its own documentation. The CMA holds powers to obtain such evidence and has already gathered customer research and notes of calls that describe it in prose. Provider documentation alone, which is what the August record used, can establish the documented conditions of a substitution but not the state a customer reaches.

6.2. Prospective baselines. No historical baseline exists in the published record or in the August record for any real customer. I therefore suggest that a baseline be taken at the point an intervention is designed, for a cohort whose composition is fixed before the intervention takes effect, and that the post-event record be taken at a stated interval. A retrospective baseline should not be reconstructed from recollection.

6.3. Cohorts by dependency state. The CMA already recognises customer heterogeneity and the difference between legacy and modern architectures. [2, paragraphs 4.235 and 4.256, pages 97 and 101; footnote 481, page 101] Cohorts for this purpose are better defined by dependency state, for example identity-rooted on Active Directory, cloud-identity only, security-integrated, server-and-database dependent, or agent-integrated, than by size or sector. Cohorting is an implementation device, not a finding.

6.4. Decision rules. A dependency is residual if the substituted function cannot operate in production without the incumbent-controlled element. It is classified as incumbent-specific where the incumbent's or the substitute's own documentation names the incumbent element as a prerequisite for the function; as generic where the same element would be required by any provider of the function, shown by putting the same question to at least one alternative provider's documentation; as customer-created where it arises from a configuration the customer could change at proportionate cost without loss of the function; as third-party where it arises from a third-party application's stated requirements; and as mixed where more than one of these tests is met. The asymmetry field is completed by putting the same question to the incumbent's own equivalent function. The outcome class follows from two recorded facts, whether

the function is divided between incumbent and substitute and which residual dependencies are flagged material, not from a separate judgement. The function list and the cohort are fixed before the intervention takes effect. A dimension is not testable if the evidence class is absent, and is recorded as such rather than estimated. A classification is recorded as observed only where it rests on contemporaneous customer-state evidence; where it rests on provider documentation alone, as the August record did, it is recorded as documented, and the two are not combined.

6.5. Reproducibility. The framework is intended to permit two independent evaluators working from the same inventories to reach comparable classifications of the presence, direction and class of a dependency; this has not yet been tested. Agreement on materiality and attribution is expected to be lower without anchors, and those fields should be treated as exploratory until inter-rater agreement has been measured. I do not describe the approach as validated.

6.6. Proportionality and burden. The approach is intended for a sample of customers at the design and review stages of an intervention, not for continuous monitoring of the market. It is designed to use evidence of the kind the CMA may collect when assessing whether an intervention is effective in achieving its aim and whether it risks not doing so; whether any additional evidence collection is proportionate would need to be determined case by case. [5, paragraph 2.12 and footnote 14, page 10]

6.7. Technology neutrality. The core record is designed to be neutral as to provider. The dependency classes and the attribution and asymmetry fields are designed to be capable of application to a customer moving a function away from another integrated enterprise ecosystem, such as Google Workspace, Amazon Web Services or Oracle; that applicability has not been tested. The application to Microsoft's Business Software Ecosystem is specific only in the components and the identity plane named.

7. Limitations

7.1. The August record concerned one stipulated enterprise, chosen as a frame rather than drawn as a sample, and makes no representativeness claim. Its eight scored rows were produced by a single evaluator; inter-rater reliability is not established; three parameters were Not Scorable; no composite was computed; the measurement read provider documentation, not behaviour. [1, sections 3.2, 7.1 and 7.2]

7.2. Quantitative super-additivity of dependence is not established by the August record and is not established by the CMA's record, whose findings on reinforcement and compounding are qualitative.

7.3. The approach proposed in section 4 has not been applied to a real customer environment and is not externally validated. Its attribution and materiality fields depend on evaluator judgement. It records attribution; it does not resolve it, and it cannot by itself establish that any residual dependency is Microsoft-specific rather than generic, customer-created or third-party. Mixed causation is expected and is recorded as such.

7.4. Integration delivers benefits that the CMA's record documents at length and that this response does not dispute. Nothing in the proposed approach treats integration, bundling or a centralised identity architecture as harmful in itself.

7.5. The note on AI agents in section 5.4 is prospective. It rests on the providers' own descriptions of new products and on limited customer evidence, as the CMA states, and it makes no claim about present conduct or present lock-in.

7.6. This response states no legal conclusion and no view on designation, on the Roadmap's prioritisation, or on whether any intervention should be imposed.

8. Conclusion

8.1. The CMA has developed a detailed account of the mechanisms through which integration, commercial practices and customer-side dependencies may weaken competitive constraints, and has gathered customer evidence of the kind the August record identified as missing. The supplementary measurement question this response puts forward is how to determine, following a relevant intervention or substitution, whether the targeted dependency has materially declined rather than changed form: which identity, data, permission, policy, telemetry, administration, workflow, application and commercial elements remain necessary for the substituted function to operate in production, with attribution and materiality recorded rather than assumed. A residual-dependency record of that kind, taken for a fixed cohort before and after an intervention, would give the CMA a concrete and testable basis for distinguishing formal implementation from structural outcome, without treating legitimate integration benefits, ordinary migration costs, customer-created complexity or third-party dependencies as Microsoft-specific dependency.

8.2. The frozen boundary, evidence journal, structural profile, component-exit table, financial-exit register and comparability register behind the August record remain available to the case team on request. I remain available to answer questions on the method.

Appendix: crosswalk of the 31 August record against the CMA's published record

31 AUGUST PROPOSITION	CMA RECORD	RELATIONSHIP
Integration across the products may create dependence greater than the sum of the products [1, 1.2]	Individual-activity analysis "would miss its key strength"; positions "mutually reinforcing"; barriers "compounding" [2, 5.153, p. 143; 5.179, p. 153]	Post-August CMA finding aligned with the qualitative question; the CMA's ecosystem hypothesis itself pre-dates the August record [6]; the finding does not validate the BHI method and neither record establishes quantitative superadditivity
Capture-side increments positive where decidable; escape-side increments zero on the reading of record [1, 2.2, 4.2]	Technical links described (Graph, Work IQ grounding, security signal) [2, 4.61, 4.65–4.72]; customer-side frictions described [2, 5.176–5.178]	Different frame: the CMA names mechanisms; the August record decomposed them into parameter increments, which are unchanged
An export capability is not an exit; completed exit defined in advance [1, 3.4]	Residual reliance after switching described [2, 5.136, p. 139; 4.203, pp. 88–89]; export and portability difficulty described [2, 5.177; 5, 3.6(b)]; no completion criterion and no before/after record	Phenomenon described, not operationalised; the subject of section 4
Per component, replaceable standalone versus replaceable in situ; nine of ten components carry a documented condition on another component [1, 3.3, 4.2]	Separating one component adds "extra logins, duplicated provisioning and governance, reworking permissions" [2, 4.239, p. 97]; a third-party IAM tool "can only be used alongside Entra ID" [3, A.157, p. 54]; a customer retained Defender for telemetry access [3, A.162(c), p. 57]	Aligned on the phenomenon; the CMA's evidence is stronger in class (customers), the August frame is structured

31 AUGUST PROPOSITION	CMA RECORD	RELATIONSHIP
Identity root retained by construction; replacement not evidenced [1, 4.2]	Entra ID required to sign in on the productivity suite [2, fn 450, p. 94]; federation is the standard architecture [2, p. 88]; legacy and modern architectures differ [2, fn 481, p. 101]	Partially aligned; the standard-architecture point narrows any Microsoft-specific reading to dependencies that Microsoft products specifically require
Customer-state evidence identified as the missing class [1, 7.3]	Customer research and notes of calls now describe that state in prose	CMA stronger; the gap is now one of structure, not of evidence
No representativeness claim for the stipulated enterprise [1, 3.2]	All-five-activity customers: small share by number, large majority of revenue; large customers tend to buy across all five [4, B.18, B.21]	Different frame; scope relevance only
AI assistant layer included by the frame's own stipulation; its AI-grounding leg read as part frame-read; no customer-state observation [1, 4.1, 5.1]	Work IQ "stateful agent"; Agent 365 "control plane"; limited customer evidence [2, 4.70, 4.75, 4.76]	Alignment on facts; state reconstructability not addressed; prospective only

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