



Microsoft Ireland Operations Ltd,
70 Sir John Rogerson's Quay,
Dublin 2, Ireland

Brussels, 22/09/2025

Re: Response to Microsoft's Letter – Windows 10 end-of-support policy and Alleged Non-Compliance with EU Law (Directive (EU) 2019/770 and Regulation (EU) 2022/2065 (Digital Markets Act)).

Dear Mr. Bissell,

Thank you for your prompt and detailed response to our letter dated July 29, 2025. We appreciate the transparency and the constructive approach you have taken to address our concerns. At the same time, we regret that several critical issues raised in our original letter remain unaddressed.

We are pleased to learn that Microsoft will provide a no-cost Extended Security Updates (ESU) option for Windows 10 consumer users in the European Economic Area (EEA). We are also glad this option will not require users to back up settings, apps, or credentials, or use Microsoft Rewards. This was our main Digital Markets Act (DMA) related concern, as linking access to essential security updates to engagement with Microsoft's own services raised reasonable doubt of compliance with obligations under Article 6(6) of the DMA.

While we maintain our position on compliance with the Digital Content Directive, we are pleased to acknowledge that the updated enrollment flow will provide a clear option to extend device protection through October 13, 2026.

At the same time, several points from our original letter remain relevant. The ESU program is limited to one year, leaving devices that remain fully functional exposed to risk after October 13, 2026. Such a short-term measure falls short of what consumers can reasonably expect for a product that remains widely used and does not align with the spirit of the Digital Content Directive (DCD), nor the EU's broader sustainable goals. Unlike previous operating system upgrades, which did not typically require new hardware, the move to Windows 11 does. This creates a huge additional burden for consumers, with some estimates suggesting that over 850 million active devices still rely on million Windows 10 and cannot be upgraded due to hardware requirements¹. By contrast, upgrades from Windows 7 or 8 to Windows 10 did not carry such limitations.

¹ <https://blog.easi.net/en/are-you-still-using-windows-10-devices>




Microsoft also appears to be phasing out Windows 10 on a much shorter timeline than in the past: support is ending only four years after the launch of Windows 11. Previous versions were given a longer transition period: Windows 7 support ended eight years after Windows 8 was introduced, and Windows XP support ended seven years after the launch of Windows Vista. In earlier cases, Microsoft's decision to end support coincided with a decline in user numbers, so that only a small share of the market relied on the retiring software. Our own survey confirms that a significant share of consumers remain on older but still functional devices: 22% still run Windows on a PC or laptop from 2017 or earlier, which cannot be upgraded to Windows 11 but continue to serve users' everyday needs.²

In particular, we wish to highlight that this decision undermines broader efforts toward circular consumption. Security updates are critical for the viability of refurbished and second-hand devices, which rely on continued support to remain usable and safe. Ending updates for functional Windows 10 systems accelerates electronic waste and undermines EU objectives on durable, sustainable digital products. Most concerningly limiting software support raises doubts about the true lifespan of these products. Consumers may question whether devices will remain usable and secure, which can erode trust in refurbished and longer-lasting electronics. The implications go beyond Windows 10 itself: repeated cycles of support cessation risk conditioning consumers to replace devices prematurely. We encourage Microsoft to consider a solution that protects consumer trust and supports sustainable use and refurbishment, rather than tying device replacement to the end of software support.

We will inform consumers throughout our channels about the free one-year expansion, as well as any other updates on this matter. Likewise, we expect to engage in fruitful conversation with Microsoft over the next year to extend device protection further. We appreciate your commitment to finding an effective solution and await your feedback.

Sincerely,

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Marco Scialdone
 Head Of Litigation
 Euroconsumers



Els Bruggeman
 Head Policy and Enforcement
 Euroconsumers

² <https://www.euroconsumers.org/microsoft-security-windows-10-planned-obsolescence/>