IRSHAD Uzbek Journal of Law and Digital Policy | Volume: 3, Issue: 4
2025

Legal Regulation of Economic Concentration (Tech-Over) in the Digital Market

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Abstract

The rapid expansion of digital markets has led to unprecedented economic concentration, driven primarily by large technology platforms acquiring, integrating, or excluding smaller competitors through mechanisms often referred to as "Tech-Over." This study offers a comparative legal analysis of how three diverse jurisdictions Turkey, France, and Singapore are regulating this phenomenon. Using a qualitative case study methodology, the research evaluates legal frameworks, regulatory instruments, institutional capacity, and enforcement practices. The findings reveal that while France employs an ex-ante model embedded in EU law, Singapore emphasizes adaptive, guideline-based governance, and Turkey is transitioning toward more robust digital oversight. Despite differences, all three jurisdictions converge on the need to monitor data control, algorithmic opacity, and cross-market dominance. The article concludes with policy recommendations for enhancing merger control, increasing institutional capability, and fostering international cooperation. These insights contribute to global debates on competition law reform and digital market governance in an era of platform capitalism.

Keywords: Tech-Over, Digital Competition Law, Economic Concentration, Platform Regulation, Merger Control, Digital Markets Act, Comparative Legal Analysis

APA Citation:

Eshonkulov, J. (2025). Legal Regulation of Economic Concentration (Tech-Over) in the Digital Market. *Uzbek Journal of Law and Digital Policy, 3*(4), 43–58. https://doi.org/10.59022/ujldp.351

I. Introduction

The digital economy has become the dominant infrastructure of global commerce, profoundly influencing how individuals, corporations, and states interact with goods, services, and each other. With the emergence of platform-based business models, such as those employed by Google, Amazon, Meta, and Alibaba, the economic landscape has shifted from traditional industrial consolidation to data-driven market dominance. These companies harness network effects, algorithmic control, and access to massive datasets to entrench themselves in multiple sectors simultaneously from e-commerce and cloud computing to social media and online advertising (Zuboff, 2019). This new economic paradigm has led to a surge in what scholars and regulators now refer to as Tech-Over: the takeover of markets by technologically dominant firms, often through strategic acquisitions (sometimes of potential competitors), data integration, or cross-platform bundling. Unlike classic monopolies, Tech-Over strategies are multidimensional, involving control over data pipelines, ecosystems, user interfaces, and even infrastructure-level dependencies (e.g., app stores, cloud services, and AI tools).

A growing body of academic literature warns that the accumulation of market power by Big Tech firms is not adequately captured by traditional antitrust tools (Khan, 2017; Crémer et al., 2019). Most national competition frameworks rely on price/output measures of consumer harm, while digital platforms often offer "free" services, obscuring the anticompetitive harm. Furthermore, the value of data, user lock-in, and algorithmic opacity require novel legal interpretations. The European Union has responded with the Digital Markets Act (DMA) a landmark ex-ante regulatory framework for digital gatekeepers. Similarly, countries like South Korea, Germany, and India have started exploring platform-specific competition reforms, recognizing that market structures have fundamentally changed.

Despite these developments, comparative legal research on how different jurisdictions especially those outside North America and Western Europe are adapting to Tech-Over remains limited. This gap is particularly important for jurisdictions like Turkey, France, and Singapore, each representing different legal traditions, levels of economic development, and institutional capacities. Unchecked market concentration in digital sectors poses significant risks to consumer welfare, innovation, small businesses, and even democratic discourse. Dominant firms can shape entire markets through control of data flows, application programming interfaces (APIs), and marketplace access. Traditional antitrust frameworks are often ill-equipped to detect or preempt Tech-Over strategies, particularly where mergers involve low-revenue but high-potential targets.

The central problem is a mismatch between legal capabilities and digital market realities. Jurisdictions must evolve from reactive enforcement to proactive regulation, developing tools that are both legally sound and technically effective. Without this evolution, legal systems risk becoming obsolete in the face of digital concentration

trends that can entrench inequality, distort innovation, and impair user choice. While global discussions on Big Tech regulation are expanding, much of the literature is concentrated on the EU and U.S. context. There is a significant gap in comparative analysis involving non-Western, mixed, or small economies such as Turkey and Singapore. These countries provide important case studies for how jurisdictions with differing legal and institutional architectures respond to global digital pressures.

Moreover, very few studies explicitly focus on Tech-Over as a legal concept, a term that captures a specific type of market consolidation in digital ecosystems. This paper addresses both these gaps by offering an in-depth legal and institutional analysis of three strategically chosen jurisdictions. The primary objectives of this research are:

- To define the phenomenon of Tech-Over and explain how it differs from traditional antitrust concerns;
- To investigate and compare how Turkey, France, and Singapore regulate economic concentration in digital markets;
- To assess the strengths and weaknesses of their respective legal frameworks;
- To offer policy recommendations for improving legal responses to digital market dominance.

What legal frameworks exist in Turkey, France, and Singapore to address Tech-Over, how effectively are they enforced by national authorities, what institutional, legal, or economic factors shape their regulatory approaches, and what lessons can other countries draw from these comparative experiences?

This research makes a significant contribution to global digital law scholarship by offering a comparative legal analysis of Turkey, France, and Singapore, three countries with diverse legal traditions and market sizes, thereby providing valuable insights into regulatory innovation and adaptation. By introducing and elaborating the concept of "Tech-Over" within legal discourse, it frames future debates in antitrust and competition law, highlighting emerging challenges posed by powerful digital platforms. The study goes beyond theoretical analysis by providing practical guidance for policymakers, particularly those in jurisdictions seeking to develop or reform digital competition laws in response to technological disruptions. Furthermore, it emphasizes the critical importance of institutional capacity-building, cross-border cooperation, and legal agility in addressing the complexities of rapidly evolving digital economies. Through its comparative lens, the research creates a multi-layered understanding of how different legal systems confront similar issues, offering transferable lessons and blueprints for reform in other regions worldwide.

II. Methodology

This study adopts a qualitative comparative legal analysis, structured around a case study methodology, to investigate how different jurisdictions regulate economic concentration in digital markets, particularly the phenomenon of Tech-Over. The comparative method is crucial because it reveals both the commonalities and divergences across legal frameworks, enforcement strategies, and institutional cultures.

By examining Turkey, France, and Singapore, the study situates regulatory practices within their respective legal and socio-economic contexts. The case study approach allows for a deeper engagement with the particularities of each jurisdiction rather than broad generalizations. It provides insights into institutional responses to the challenges posed by digital mergers, platform dominance, and cross-border regulatory gaps. Unlike statistical generalization, this research pursues analytical generalization, aiming to contribute to theoretical debates in digital competition law while offering practical guidance for policymakers seeking to navigate the evolving landscape of digital regulation (Watson, 1974; Zweigert & Kötz, 1998).

The analysis relies on both primary and secondary data sources to construct a comprehensive and credible legal comparison. Primary sources include legislation, statutes, merger control regulations, and consumer protection frameworks that define the legal boundaries of digital competition. Administrative decisions and judicial rulings, particularly from authorities such as the Turkish Competition Authority (TCA), the French Competition Authority (Autorité de la concurrence), and the Competition and Consumer Commission of Singapore (CCCS), provide practical insights into how laws are interpreted and applied. Official guidelines, interpretative reports, and regulatory notices further clarify enforcement priorities and procedural requirements. Secondary sources, including peer-reviewed academic literature, comparative law reviews, and scholarly books, offer critical perspectives and contextual depth. Policy papers and reports from institutions like the OECD, UNCTAD, the European Commission, and the World Economic Forum enrich the analysis with international benchmarks. Documents published between 2018 and 2024 are prioritized, ensuring that findings reflect the most dynamic phase of digital regulation reform.

The choice of Turkey, France, and Singapore is deliberate, reflecting a diversity of legal traditions, regulatory maturity, and positions within the global digital economy. Turkey, as an EU candidate country with a fast-growing digital sector, represents a transitional system that frequently aligns itself with European standards but retains unique national dynamics. France, as a central actor within the European Union, demonstrates how supranational policies like the EU Digital Markets Act interact with domestic enforcement, offering insights into integrated regulatory governance. By contrast, Singapore exemplifies a small but highly influential jurisdiction with a hybrid legal system rooted in common law traditions. It has cultivated a reputation for agile regulatory responses, positioning itself as a global technology hub in Southeast Asia. Together, these jurisdictions provide a heterogeneous sample across civil law, common law, and hybrid systems, spanning emerging and developed economies, thereby enriching the comparative legal analysis with varied perspectives.

To ensure consistency and depth, the study employs an analytical framework built upon six interrelated dimensions. First, legislative clarity and scope assess how Tech-Over and digital mergers are legally defined, alongside any sector-specific provisions targeting technology platforms. Second, institutional capacity evaluates the

independence, resources, and technical expertise of competition authorities, alongside the scope of their investigative and enforcement powers. Third, procedural mechanisms focus on whether pre-merger notification requirements exist for digital platforms and how thresholds such as transaction value, market share, or user data volumes are determined. Fourth, substantive legal standards consider how anti-competitive harm is assessed in digital contexts, including issues of data dominance, interoperability, and ecosystem entrenchment. Fifth, enforcement outcomes explore the track record of national authorities in approving, blocking, or conditioning Tech-Overs, while also examining the role of judicial review. Finally, alignment with international norms investigates convergence with frameworks like the OECD, UNCTAD, and EU Digital Markets Act.

III. Results

Turkey's regulation of digital market concentration is primarily rooted in the Law on the Protection of Competition No. 4054 of 1994, which was significantly updated in 2020 to address emerging challenges of the digital era. While the country has not yet adopted a dedicated statute for digital platforms, the Turkish Competition Authority (TCA) has taken an expansive approach by interpreting existing antitrust provisions to cover mergers, acquisitions, and conduct involving data-driven technologies. One of the most significant innovations in this regard was the 2022 amendment to the Merger Communiqué (No. 2010/4), which introduced transaction value thresholds alongside turnover-based thresholds. This change was motivated by the risk of missing acquisitions of start-ups and digital platforms with a large user base but low revenue. Under the amendment, any transaction exceeding TRY 750 million (about USD 40 million) must be notified, particularly in the technology, media, and digital platform sectors.

In recent years, the TCA has launched high-profile investigations into dominant digital firms suspected of engaging in anti-competitive behavior and potential "Tech-Over" strategies. A major focus has been Google, which faced multiple fines between 2020 and 2023 for abusing dominance in the search and mobile operating system markets. The investigations highlighted the significance of interoperability, market fairness, and protection of ecosystem competition. In 2021, the authority turned to Facebook/Meta, investigating its policies surrounding WhatsApp data integration. The concern was that consolidating user data across platforms without clear consent could entrench Facebook's dominance, raising both competition and privacy concerns. The Trendyol case in 2021 also demonstrated the authority's proactive stance, where allegations of algorithmic self-preferencing led to a commitment decision requiring the platform to maintain transparency and non-discrimination toward third-party sellers. These enforcement actions reveal Turkey's growing reliance on behavioral remedies and conditional obligations, even though its law is still formally ex-post.

Turkey has invested significantly in strengthening its institutional framework for regulating the digital economy. The TCA has established a dedicated Digital Markets

and Data Analysis Unit to enhance technical expertise in assessing complex platform behavior. Alongside this, the authority began publishing a Digital Economy Report series, which provides analytical insights into platform operations, data consolidation strategies, and competitive risks. Collaboration has also expanded to include sectoral regulators such as the Information and Communication Technologies Authority (BTK), ensuring that telecommunications and digital markets oversight are better aligned. International engagement further supports institutional growth, as Turkey actively participates in the OECD's Working Party on Competition in the Digital Economy. This involvement not only exposes Turkish regulators to global best practices but also places the country within a wider policy dialogue. Together, these measures indicate that Turkey is attempting to transition from a reactive enforcement model to a more proactive regulatory environment.

Despite its reforms, Turkey faces several ongoing challenges in its efforts to regulate digital markets effectively. The most obvious gap is the absence of a dedicated digital markets act comparable to the European Union's Digital Markets Act (DMA). Instead, enforcement remains dependent on flexible interpretation of general antitrust law, which creates uncertainty for both regulators and firms. Moreover, judicial precedent on digital mergers and anti-competitive practices is still limited, meaning that reviews of TCA decisions in the courts can be unpredictable and inconsistent. Technical capacity also remains a concern, particularly in areas such as algorithmic auditing, data economics, and assessing ecosystem entrenchment. While Turkey's competition authority is modernizing rapidly, these gaps limit the depth and predictability of its enforcement. Addressing these weaknesses will be essential if Turkey wishes to establish a comprehensive, future-proof framework capable of handling increasingly complex digital mergers and conduct cases.

France has positioned itself as one of the most active European jurisdictions in regulating digital market concentration through a dual legal framework that combines national competition law with EU-level digital regulation. Domestically, the French Commercial Code (Articles L. 420-1 to L. 430-10) governs anti-competitive practices and merger control, with enforcement led by the Autorité de la concurrence (ADLC). On the European front, the ADLC is responsible for applying Article 102 TFEU and, more recently, the EU Digital Markets Act (DMA), which came into force in 2023. The DMA introduces ex-ante obligations for designated "gatekeepers" such as Google, Apple, Meta, and Amazon, requiring them to ensure interoperability and fair platform practices. France has also introduced its own legislation, the Loi n° 2021-1382, to regulate platform transparency and contestability at the national level, thereby empowering the ADLC to issue structural injunctions and conduct broader market inquiries into systemic risks posed by digital actors.

France has built a reputation for robust enforcement against Big Tech through a series of high-profile interventions. Between 2019 and 2021, the ADLC imposed fines exceeding €500 million on Google for abusing its dominance in the search and

advertising markets, particularly targeting opaque ranking systems and exclusionary conduct. In 2021, Apple's App Tracking Transparency (ATT) policy was scrutinized to determine whether privacy restrictions gave Apple an undue advantage in advertising markets, reflecting an innovative approach that integrates data protection into competition analysis. The ADLC also engaged in the EU-level review of Meta's acquisition of Kustomer in 2022, stressing the risks of cross-market dominance and control over data. Beyond these cases, France has been a leader in investigating emerging sectors such as cloud computing, with particular attention to Microsoft's bundling practices. These interventions underscore France's strategy of addressing both traditional competition abuses and the complex risks posed by digital ecosystems.

The strength of France's regulatory model lies in the institutional sophistication of the ADLC. A dedicated Digital Economy Unit has been established, staffed with economists, data scientists, and legal experts specializing in digital markets. The ADLC works closely with the Commission nationale de l'informatique et des libertés (CNIL), aligning competition enforcement with data protection requirements under the GDPR. France also plays a central role in European Union-wide initiatives, contributing actively to task forces focused on DMA enforcement and gatekeeper designation. Beyond legal mechanisms, the ADLC has invested in advanced regulatory tools such as algorithmic monitoring systems and behavioral economics models, enhancing its ability to detect subtle market distortions.

Despite its proactive and sophisticated approach, France continues to face significant challenges in digital competition enforcement. Judicial review of ADLC decisions is often lengthy and complex, which can undermine regulatory certainty for businesses and slow down the implementation of remedies. Moreover, while France enjoys significant autonomy, much of its enforcement is influenced by EU institutions, particularly under the DMA framework, where decisions on gatekeeper designations and remedies are coordinated at the regional level. Another difficulty is enforcement asymmetry: while regulation under the DMA and national law primarily targets a few very large firms, mid-sized digital companies may also engage in exclusionary practices that escape similar scrutiny. This raises questions about proportionality and competitive fairness across the digital economy. Nevertheless, France's combination of firm domestic action and EU-level integration ensures that it remains a global reference point for digital market regulation, offering both innovation and institutional depth.

Singapore has developed a distinctive approach to digital market regulation, marked by flexibility, pragmatism, and an emphasis on balancing innovation with competition safeguards. The Competition Act 2004 serves as the primary legal basis, enforced by the Competition and Consumer Commission of Singapore (CCCS). Unlike some jurisdictions that have adopted stand-alone digital legislation, Singapore integrates regulation of digital platforms into its general competition and consumer protection framework. This allows the CCCS to adapt existing laws through updated guidelines, such as the 2021 Guidelines on Competition Assessment of Mergers

Involving Digital Platforms and the 2022 Merger Procedures Guidelines. These guidelines address issues unique to digital markets, including non-revenue-based mergers, ecosystem dominance, and data-driven advantages. Singapore also emphasizes inter-agency coordination, with the CCCS working alongside the Infocomm Media Development Authority (IMDA) and the Monetary Authority of Singapore (MAS) to ensure coherent oversight across sectors. This integrated, cross-agency model underpins Singapore's regulatory agility.

While Singapore has not prohibited a major Tech-Over transaction outright, the CCCS has actively monitored and intervened in digital market cases. The most prominent example is the 2018 Grab/Uber merger, which saw Uber exit Southeast Asia by transferring operations to Grab. The CCCS determined that the transaction substantially reduced competition in ride-hailing services, imposing a penalty of SGD 6.42 million and mandating behavioral remedies such as prohibiting driver exclusivity arrangements and requiring greater price transparency. More recently, in 2021–2022, the authority examined consolidation trends in food delivery and digital payment platforms, including Delivery Hero/Foodpanda and ShopeePay. These investigations, though not prohibitive, helped the CCCS refine its merger assessment tools and early intervention strategies. In 2023, Singapore also initiated a market inquiry into online advertising, focusing on Google's practices and the risks of closed ecosystems. These cases illustrate Singapore's preference for preventive, consultative, and corrective measures rather than full prohibitions.

Singapore's effectiveness in regulating digital markets is strengthened by its commitment to institutional innovation and technical capacity-building. The CCCS has established internal units specializing in algorithmic and data analytics, equipping regulators with the expertise needed to evaluate algorithm-driven harm, platform pricing strategies, and market manipulation. Beyond enforcement, Singapore has introduced sandbox frameworks that allow emerging technology firms to test new services under lighter regulatory conditions with oversight, striking a balance between innovation and competitive safeguards. Another distinctive feature is its guideline-driven flexibility: the CCCS issues detailed yet non-binding guidelines that shape corporate behavior and provide clarity without immediate litigation. This approach fosters dialogue between regulators and industry actors, promoting compliance while minimizing regulatory burden. Singapore also participates in international networks such as the ASEAN Expert Group on Competition (AEGC) and the OECD Global Forum on Competition, ensuring its practices remain aligned with global standards while retaining local adaptability.

Despite its progressive and forward-looking framework, Singapore faces inherent challenges in regulating digital markets. First, enforcement precedents remain relatively limited compared to larger jurisdictions like the EU or U.S., which reduces the body of jurisprudence available for future cases. Second, Singapore's small market size limits its leverage over global technology giants, making unilateral regulation less impactful unless coordinated with regional or international partners. Third, the government's

strong commitment to fostering digital innovation sometimes delays or softens interventions, as regulators aim to avoid discouraging investment in the technology sector. This balancing act between growth and regulation can create uncertainty in enforcement priorities. Nonetheless, Singapore has earned global recognition for its proportional, technically rigorous, and innovation-friendly regulatory approach. By combining flexible legal tools, institutional expertise, and international cooperation, Singapore has become a model for small yet digitally advanced economies navigating the challenges of Tech-Over in the digital marketplace.

The comparison of Turkey, France, and Singapore shows that, despite differences in legal traditions, all three recognize the unique characteristics of digital markets and the inadequacy of traditional competition metrics such as turnover and market share. Each jurisdiction increasingly considers factors like control over data, size of user base, and ecosystem entrenchment when assessing mergers and anti-competitive practices. Another shared trend is the gradual shift toward proactive and ex-ante regulation. France, through the EU's DMA, imposes strict obligations on gatekeepers, while Turkey uses behavioral remedies and Singapore adopts guideline-based consultations to prevent harm before it occurs. Cross-agency collaboration also emerges as a key feature, as competition, telecommunications, and data regulators coordinate to oversee complex digital ecosystems. Finally, all three countries actively engage in global competition forums such as the OECD and UNCTAD, reflecting a broader recognition that digital competition challenges transcend borders and require international cooperation.

Despite shared themes, important divergences distinguish Turkey, France, and Singapore. Turkey follows a civil law tradition and has aligned with EU norms, but it lacks a dedicated digital markets act, relying instead on hybrid merger thresholds and selective enforcement. France, in contrast, operates within both national and EU legal frameworks, making it the most comprehensive model with strong ex-ante obligations under the DMA and national platform legislation. Singapore, rooted in common law, adopts a pragmatic and hybrid regulatory style, preferring flexible guidelines and early consultations rather than heavy structural remedies. Differences also arise in enforcement style: France tends to impose significant fines and structural remedies, Turkey relies on moderate interventions, and Singapore emphasizes adaptive and consultative measures. Each faces unique challenges: Turkey struggles with capacity and judicial uncertainty, France with EU dependency and enforcement asymmetry, and Singapore with limited market leverage. These divergences illustrate how legal culture shapes digital regulation.

From these three jurisdictions, several best practices emerge that could inform global approaches to digital market regulation. Turkey's use of transaction value thresholds in merger assessments is particularly effective for identifying "killer acquisitions" of start-ups that lack substantial revenue but hold significant strategic value. France's gatekeeper framework, as part of the DMA, provides a structured model for imposing obligations on dominant platforms before harm occurs, ensuring a more

predictable regulatory environment. Singapore's guideline-driven flexibility stands out as a tool for maintaining industry dialogue while guiding behavior without immediate litigation. Additionally, across all three countries, innovations such as algorithmic audits, behavioral economics in enforcement, and interoperability mandates reflect a growing trend toward embedding technical expertise into competition law. These practices demonstrate that effective regulation requires not only legal frameworks but also institutional creativity and technical capacity, ensuring that regulators remain equipped to address evolving challenges in the digital marketplace.

IV. Discussion

The comparative analysis of Turkey, France, and Singapore illustrates that while each jurisdiction has advanced its competition regulation in digital markets, their levels of effectiveness diverge due to differences in legal frameworks and institutional strength. France benefits from the European Union's Digital Markets Act (DMA), which equips regulators with forward-looking powers such as banning self-preferencing, mandating interoperability, and regulating data access before harm occurs. This proactive approach ensures systemic oversight of digital platforms. Singapore adopts a flexible strategy, relying on guidelines and soft law tools rather than comprehensive statutes. This pragmatic model allows regulators to adapt swiftly to technological shifts, though enforcement may be weaker against global firms. Turkey's reforms such as transaction value thresholds and commitments signal progress, but absence of a dedicated digital markets act still constrains its capacity. Collectively, these jurisdictions highlight the spectrum of regulatory maturity in addressing Tech-Over concerns across different legal systems.

One of the most pressing challenges in Tech-Over regulation is jurisdictional enforcement. Digital platforms operate globally, often headquartered in one jurisdiction but exerting dominance in several others, complicating legal oversight. Smaller economies or those without extraterritorial reach face difficulties in implementing remedies, as global firms can evade obligations by shifting operations. Singapore exemplifies this struggle, frequently requiring cooperation with foreign regulators to ensure compliance with its competition orders. France benefits from EU-level coordination, allowing enforcement across member states, yet still encounters challenges when platforms are based outside Europe. Turkey, despite aligning with OECD best practices, faces similar barriers due to limited regional enforcement mechanisms. This issue underlines the importance of international cooperation and harmonization of legal tools. Without cross-border mechanisms, remedies remain fragmented, giving dominant platforms opportunities for regulatory arbitrage, thereby undermining the broader effectiveness of Tech-Over governance in the digital economy.

Data control and algorithmic opacity form another layer of complexity in Tech-Over regulation. Dominant platforms often rely on proprietary algorithms to manage search rankings, advertising placement, or pricing strategies, making it difficult for

regulators to evaluate potential harms. The reliance on data-driven decision-making systems creates information asymmetries between companies and regulators, reducing transparency. France has begun investing in algorithmic auditing tools to address this gap, but even there, institutional capacity is limited, and full access to technical infrastructure remains rare. Singapore's evidence-based enforcement approach is agile, but technical expertise is continually tested by fast-evolving AI systems. Turkey also struggles to define a coherent framework for algorithmic oversight, relying heavily on case-specific investigations. The broader challenge lies in developing regulatory expertise that can penetrate these opaque systems without undermining intellectual property protections. Without adequate tools, regulators risk lagging behind technological innovation, leaving anti-competitive practices undetected and unchecked.

A further obstacle in regulating Tech-Over is the conceptual ambiguity surrounding emerging terms such as "gatekeeper," "killer acquisition," and "ecosystem entrenchment." These concepts lack uniform legal recognition across jurisdictions, creating inconsistency in enforcement. The European Union's DMA has attempted to standardize definitions by providing clear gatekeeper criteria, but Turkey and Singapore still lack comprehensive legislative clarity. This ambiguity not only hampers regulators but also creates uncertainty for digital firms, start-ups, and investors who must navigate unpredictable rules. Divergent interpretations also complicate cross-border coordination, as what constitutes a harmful concentration in one country may not meet thresholds elsewhere. The result is fragmented enforcement and uneven accountability for dominant platforms. Resolving these ambiguities through legal reform and jurisprudence is crucial to building predictability in digital markets, enabling both effective regulatory oversight and confidence among innovators that their competitive conduct will be judged by clear and consistent standards.

Balancing innovation with regulation remains a delicate challenge in the governance of digital markets. Jurisdictions such as Singapore, which prioritize entrepreneurial dynamism, hesitate to impose overly strict measures that might discourage start-up growth or deter foreign investment. Similarly, Turkey faces the challenge of modernizing its competition regime without undermining its ambition to attract global tech firms. France, operating within the EU framework, illustrates that regulation need not stifle innovation if clarity and proportionality guide enforcement. The key lies in ensuring that intervention targets harmful concentration while safeguarding space for innovation. Sandboxing approaches, periodic reviews, and sunset clauses are increasingly recognized as tools that help strike this balance. Governments must avoid binary thinking either overregulation or laissez-faire and instead adopt flexible mechanisms that evolve with technology. Ensuring this balance is critical to sustaining healthy competition while nurturing the innovation ecosystem upon which future economic growth depends.

For jurisdictions with emerging frameworks, adopting dedicated digital market laws is imperative. Turkey exemplifies a country that has modernized its competition

rules yet lacks a comprehensive digital markets act. Such legislation could provide clarity on defining gatekeepers, prescribing ex-ante obligations, and regulating conduct unique to digital platforms. Reliance on guidelines and case-specific interpretations may create flexibility but ultimately leaves enforcement fragmented and vulnerable to corporate exploitation. France's integration of the DMA demonstrates the importance of a structured legal backbone. Singapore's flexible model, while pragmatic, also shows that without binding obligations, global platforms may selectively comply. Clear statutory measures create predictability for all actors, from regulators to innovators, while also enhancing institutional legitimacy. Thus, for effective regulation of Tech-Over, jurisdictions should consider moving beyond interpretative instruments toward codified, comprehensive digital market laws that directly address the structural features of digital concentration.

Traditional merger control based on turnover thresholds is insufficient in capturing the realities of digital markets, where acquisitions often involve low-revenue but high-value start-ups. The concept of "killer acquisitions" exemplifies this gap: dominant platforms acquire emerging rivals to prevent future competition, often without triggering financial reporting thresholds. France has already integrated non-turnover criteria into its merger assessment, while Turkey has recently introduced transaction value thresholds. Singapore, relying on case-by-case evidence, faces challenges in consistently capturing such deals. To address this, all jurisdictions should expand review criteria to include user base, data assets, and market potential as measurable factors. These metrics better reflect the strategic importance of digital acquisitions and prevent harmful concentration from escaping regulatory scrutiny. By adopting broader criteria, regulators can effectively safeguard innovation and maintain competitive dynamics in digital markets without relying solely on conventional financial indicators.

A central element of effective Tech-Over regulation lies in institutional capacity-building. Regulators require expertise in digital economics, data science, and algorithmic auditing to analyze complex market behaviors. France has made progress through collaboration between its competition authority (ADLC) and data protection regulator (CNIL), setting an example of cross-agency cooperation. Singapore emphasizes technical pragmatism by equipping its Competition and Consumer Commission with specialist teams to conduct evidence-based investigations. Turkey, though advancing, still faces gaps in institutional capacity, with regulators largely dependent on external consultations or international networks. To address these disparities, countries should formalize inter-agency task forces, invest in specialist recruitment, and develop in-house technological audit capabilities. Such investments not only enhance enforcement capacity but also improve regulatory credibility. Without robust technical institutions, even the strongest legal frameworks risk becoming symbolic, lacking the operational ability to address the opaque realities of digital markets effectively.

Given the global reach of digital platforms, no single jurisdiction can effectively regulate Tech-Over in isolation. Cross-border remedies, joint investigations, and intelligence sharing are increasingly necessary to prevent regulatory arbitrage. France, operating within the EU, already benefits from collective enforcement. Singapore frequently coordinates with larger jurisdictions, while Turkey actively participates in OECD dialogues to strengthen global linkages. To enhance cooperation, regulators should formalize agreements for mutual recognition of decisions, shared access to data, and joint enforcement strategies. Participation in multilateral institutions such as OECD, UNCTAD, ICN, and ASEAN forums must be expanded to harmonize definitions and enforcement priorities. Without such cooperation, global tech firms can exploit jurisdictional fragmentation, undermining national efforts. Building a collaborative ecosystem of regulators is therefore essential for meaningful oversight, ensuring that digital competition law evolves as a global, rather than isolated, response to Tech-Over challenges.

Moving from reactive punishment to proactive regulation is critical for future-proofing digital markets. Ex-ante obligations such as requiring transparency, fairness, and interoperability empower regulators to act before consumer harm materializes. France's implementation of the DMA demonstrates how structured obligations prevent long-term entrenchment by dominant platforms. Turkey and Singapore, however, rely largely on case-by-case enforcement, leaving them vulnerable to delayed interventions. Institutionalizing ex-ante powers means creating predictable frameworks that not only restrict anti-competitive practices but also encourage innovation through regulatory sandboxes. Periodic reviews and sunset clauses can balance oversight with flexibility, ensuring that interventions remain proportionate and adaptable to market evolution. By embedding ex-ante authority within competition regimes, jurisdictions can safeguard against entrenched dominance and systemic risks, transforming regulation into a proactive tool for shaping competitive digital ecosystems rather than merely punishing misconduct after harm has already occurred.

The experiences of Turkey, France, and Singapore illustrate that there is no universal model for regulating Tech-Over. Legal frameworks must align with each jurisdiction's institutional capacity, market structure, and geopolitical environment. France demonstrates the benefits of integration within a regional regulatory system, while Singapore illustrates that incremental reform through guidelines and capacity-building can be effective even without comprehensive legislation. Turkey highlights the value of aligning with international standards during regulatory transition. For other jurisdictions, particularly in the Global South, these cases show that incremental reform and institutional strengthening can create meaningful impact. Legal clarity reduces uncertainty, encouraging start-up activity, while internal coherence across competition, consumer protection, and innovation policies prevents fragmented enforcement. These lessons emphasize that effective regulation is less about copying existing models and

more about contextual adaptation and sequencing reforms in ways that sustain innovation while addressing harmful concentration.

Conclusion

The future of regulating Tech-Over in the digital economy depends on recognizing the transformative nature of technology in reshaping competition, consumer behavior, and legal boundaries. This study highlights that while digital consolidation has created opportunities for innovation and efficiency, it has also intensified risks of monopolistic dominance, data exploitation, and regulatory gaps. France, Singapore, and Turkey represent diverse responses to these challenges, illustrating that no single approach offers a universal solution. Instead, their experiences reveal the necessity of tailoring regulation to domestic institutional strengths and economic conditions. Future scholarship should move beyond descriptive comparisons and invest in empirical studies that evaluate how specific interventions influence innovation, investment flows, and consumer welfare. Only through such evidence-based insights can policymakers design interventions that balance innovation with fair competition. The conclusion is clear: digital competition law must evolve as rapidly as the technologies it seeks to govern.

The role of the judiciary in shaping the trajectory of digital market regulation is another area that warrants close attention. In countries like Turkey, where judicial precedent in competition law is still developing, the courts' interpretations will significantly determine the strength and clarity of emerging regulatory frameworks. This underlines the importance of legal scholarship focused on judicial decision-making and comparative analysis of how courts across jurisdictions navigate complex issues such as data-driven market dominance and algorithmic manipulation. Unlike legislatures, which often move slowly, courts have the ability to set binding precedents that can either advance or hinder effective digital regulation. Therefore, greater academic engagement with judicial reasoning, its limitations, and its potential for harmonization across borders will be crucial.

The Global South presents unique challenges and opportunities in regulating Tech-Over. Developing economies must balance the dual priorities of promoting digital growth and preventing harmful monopolization. Without adequate legal and institutional capacity, premature or poorly designed interventions risk stifling innovation and deterring foreign investment. However, neglecting regulation altogether can allow unchecked concentration that undermines local entrepreneurship and consumer welfare. Future research should investigate capacity-building models that are context-sensitive, affordable, and adaptable to diverse legal traditions. Comparative case studies across African, Asian, and Latin American economies could illuminate best practices for building robust regulatory bodies, training judicial actors, and ensuring adequate technical expertise.

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