INTER-AI-AGENT COMPETITION

BY STEFAN THOMAS[1]

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Agentic AI can extend the reasoning capabilities of Large Language Models ("LLM") into real world action beyond mere text production. AI agents can operate tools and thereby render workflows more efficient. This development challenges competition from two sides: First, it is notoriously difficult to understand the reasoning of an LLM, which has to do with its capability of autonomous learning. Second, an AI agent is not a monolithic technological entity. Rather, the notion describes a vertical stack of components that can be designed, operated and/or owned by different stakeholders. These two aspects combined can make it difficult to understand whether an AI agent fully represents consumers' interests when making contracts on economic markets. This article furthers the posture that competition between AI agents is a viable remedy to ensure that agents pursue consumer interests. It defines core areas for inter-agent competition and what these mean for antitrust enforcement.

I. INTRODUCTION

Agentic AI can extend the reasoning capabilities of Large Language Models (LLM) into real world action beyond mere text production. AI agents can operate tools and thereby render workflows more efficient. This development challenges competition from two sides: First, it is notoriously difficult to understand the reasoning of an LLM, which has to do with its capability of autonomous learning. Second, an AI agent is not a monolithic technological entity. Rather, the notion describes a vertical stack of components that can be designed, operated and/or owned by different stakeholders. These two aspects combined can make it difficult to understand whether an AI agent fully represents consumers' interests when making contracts on economic markets. This article furthers the posture that competition between AI agents is a viable remedy to ensure that agents pursue consumer interests. It defines core areas for inter-agent competition and what these mean for antitrust enforcement.

II. THE COMPONENTS BEHIND AI AGENTS

An AI agent consists of different components. The following remarks focus on agents that are employed to make contracts on markets. Their agentic capabilities relate to economic action. This article will not deal with agentic AI in other fields, such as robotics. Even though there is no clear definition of agentic AI yet, it is essentially a connection between three relevant actors: (1) The user (hereinafter also referred to as the consumer), (2) the LLM, which does the reasoning, and (3) the tool, which is supposed to be operated by the agent, such as the airline booking site where the agent ventures to make a contract on behalf of the consumer. These three actors are connected by orchestration code which includes, notably, a user interface and a memory layer to store feedback during turns. The combination of all these elements enables the agent to memorize user interaction and data retrieved from the outside, such as reactions from the tool, and to translate the LLM's output into action vis-à-vis the tool.[2]

From here, it is already possible to draw first conclusions on competition parameters. Frist, the AI agent is only as effective as all these layers interoperate. To the extent that there is a bottleneck or restriction in any of these components, the entire agent can be compromised in its performance. Accessibility of markets for agents is therefore determined by access to each of these components. Second, AI agents are not monolithic blocks of software engineering. Rather there is a layer of autonomous decision making (the LLM) between additional layers of pivotal components that can each be designed, operated and owned by different legal entities. To flesh out this second point, consider the following possible architectures of an AI agent (as mere examples, not as an exhaustive list): The owner of a closed weight model, such as OpenAI, allows tool operators, like a booking platform, to embed their apps in the ecosystem of the LLM, so that the users can conversationally search and book flights using the LLM.[3] Alternatively, an independent provider of an AI agent might use an open weight model, which runs on rented compute on a third-party cloud and is connected to an outside tool, such as to GitHub. Another option would be the owner of a tool, like the booking platform, developing their own AI agent which is based on an external closed weight model or open weight model. Booking.com[4] and Klarna[5], among many other firms, for example, have developed such proprietary AI agents. Another architecture would be for the agent to operate on the user's own hardware, such as in the case of OpenClaw.[6]

What becomes clear is that the actions of the agent can touch upon the economic interests of different actors who can be involved in the architecture of the agent[7] in different ways. Even though the agent acts upon a user's instruction, it is not clear whether the agent's action is exclusively aligned with the user's interests.[8] This layer of opacity is increased by the fact that the autonomous agent can be influenced by outside

2 For a description on Agentic AI capabilities from a consumer law perspective see U.K. CMA, Agentic AI and consumers, 9 March 2026: https://www.gov.uk/government/publications/agentic-ai-and-consumers/agentic-ai-and-consumers.

3 See, for example, apps in ChatGPT: https://chatgpt.com/apps.

4 See booking.com's press release of 27 June 2023: Booking.com Launches New AI Trip Planner to Enhance Travel Planning Experience: https://news.booking.com/booking-com-launches-new-ai-trip-planner-to-enhance-travel-planning-experience/.

5 See Klarna's press release: https://www.klarna.com/international/press/klarna-ai-assistant-handles-two-thirds-of-customer-service-chats-in-its-first-month/.

6 https://github.com/openclaw/openclaw: "OpenClaw is a personal AI assistant you run on your own devices."

7 See for an overview from the computer science perspective Asaf Yehudai, Lilach Eden, Alan Li, Guy Uziel, Yilun Zhao, Roy Bar-Haim, Arman Cohan, Michal Shmueli-Scheuer, Survey on Evaluation of LLM-based Agents, March 2025 (revised April 2026): https://arxiv.org/abs/2503.16416.

8 See also Michal S. Gal & Niva Elkin-Koren, Algorithmic Consumers, 30 HARV. J. L. & TECH. 309, 311 (2017).

actors[9] so that it becomes practically impossible for any involved stakeholder to know precisely whether and to what extent certain interests are represented in the agentic action.

Naturally, this problem is an emanation of the principal-agent paradigm on which a rich literature in institutional economics exists. However, when it comes to agentic AI, it is questionable whether fiduciary duties or transparency obligations can effectively reign in opportunistic behavior of the agent to the detriment of the consumer principal. The AI agent is not a natural or legal person, at least not according to mainstream legal thinking. The agent itself, therefore, cannot be held accountable. The employment of agentic AI is rather about managing the risks of its employment between the actors involved. This article does not investigate whether any actor in this agentic AI stack is, theoretically, obliged to or should be obliged to explain in what way certain interests are served by the agent. From the perspective of AI engineering, however, it would be highly questionable whether statements on whose' interests are being served in what way could ever seriously be made by any involved stakeholder, at least in a more than very generic way. The autonomy of the LLM and the extensive feedback loops involved in agentic AI are part of the agent's efficiency. Precise knowledge about the determining factors is, partly, antithetical to the underlying architecture. In any event, this article is not the place to investigate the principal agent problem from this perspective any further.

This leaves us with the preliminary hypothesis that there can be an inherent opacity about whose' interests are being represented in an agentic decision and to what extent. This article, now, furthers the argument that competition between AI agents can be a viable remedy to prevent consumers from being harmed by this opacity. When consumers can choose between competing AI agents, they would have the ability to discern which agent serves their interest best. They might compare, for example, different booking suggestions initiated via different agents. Possibly, consumers might even have the ability to employ meta-agents that disseminate assignments to several rival agents simultaneously and choose the most efficient outcome for themselves. At this point, it is expedient to briefly summarize the afore and taper down the research focus of the remainder of this article:

Inter agent competition can be seen as an important parameter of workable markets, since it avoids market failure. This aspect can feature in a variety of antitrust enforcement contexts. A merger between stakeholders in the agentic AI stack might warrant a closer look into the workability of inter agent competition to prevent, say, a platform from foreclosing agents from entering the platform. Refusal to deal, self-preferencing or tying theories of harm involving dominant players in the agentic AI stack might also raise the question as to whether rivalling AI agents can still enter the market. This article will not venture to flesh out all conceivable case scenarios where inter agent competition can possibly grow into significance. Rather, it will focus on the analysis of its determinants from a more abstract position.

Also, this article will not undertake an in-depth analysis of efficiencies. Naturally, efficiencies form part of any fully fledged antitrust assessment, notably in mergers or unilateral conduct cases. Importantly, restricting or even refusing access of a third party to one's own service or platform can be a measure to protect investments and incentivize innovations by ensuring appropriation of one's own efforts. Any access claim, therefore, entails two potential implications: it can enhance static efficiency thanks to enabling third parties to provide services in connection with the platform, yet refusing access can also enhance dynamic efficiency by protecting incentives to invest in platform related development for the future.[10] This is only to emphasize that access remedies to solve bottlenecks should always be based on a case-by-case analysis and not be considered the default option under all circumstances.[11] However, a deeper analysis would go beyond what is possible in this compressed article.[12]

Moreover, this article will home in on the specific challenges that come with the technological and economic architecture of agentic AI. It will not provide an overview of existing decisional practice and investigations around matters involving AI. In some cases[13], agencies have held concerns that or investigated whether platform operators might have the ability and incentives to foreclose their platforms to rivals offering AI

9 Where the agent accesses and operates the tools via browser activity akin to a human being by way of visual recognition, it is possible, for example, that the agent is influenced by signals which are sent via an external website which the browser has scanned, see Abhishek Sharma, Fordel Studios of March 22, 2026, AI Browser Agents: The New Automation Layer Between Your Code and the Web: https://fordelstudios.com/research/ai-browser-agents-new-automation-layer-2026.

10 See, for example, highlighting this aspect within the overall assessment of a theory of harm, ECJ of 25 March 2021, Case C152/19 P, ECLI:EU:C:2021:238 [Deutsche Telekom], para 47.

11 API/-protocol disclosure and interoperability obligations have been imposed on several occasions as merger remedies or in unilateral conduct cases, see (on Article 82 EC) EC Commission of 24 March 2004, case COMP/C-3/37.792 [Microsoft]; (on Article 6(7) DMA) EU Commission of 19 March 2025, case DMA.100204 [SP - Apple - Article 6(7) – Process]; Final Judgment, U.S. v. Microsoft, No. 98-1232 (CKK) (D.D.C. Nov. 12, 2002), https://www.justice.gov/atr/case-document/final-judgment-133.

12 The EU Commission emphasizes the need to consider efficiencies of generative AI, see Klaus Kowalski/Cristina Volpin/Zsolt Zombori, EU Commission Competition Policy Brief No 3/2024, Competition in Generative AI and Virtual Worlds, p. 6.

13 See also from a policy perspective EU Commission, U.K. CMA, U.S. DOJ and FTC, 23 July 2024: Joint Statement on Competition in Generative AI Foundation Models and AI Products, p. 2: https://competition-policy.ec.europa.eu/document/download/79948846-4605-4c3a-94a6-044e344acc33_en?filename=20240723_competition_in_generative_AI_joint_statement_COMP-CMA-DOJ-FTC.pdf.

related products[14] or services.[15] Even though involving products or services based on AI, these cases do not feature, at least not prominently, the competition challenges coming with agentic AI dealt with in the following. The mere fact that products involved in harmful conduct entail AI does not make the underlying theory of harm an emanation of the specific challenges of agentic AI.

Another caveat should be made. When assessing inter agent competition, horizontal collusion can become an issue. There is an entire stream of research in economics and computer science about collusion between LLMs[16], which is – from a legal perspective – pretty much an extension of previous work done on coordination between pricing algorithms.[17] This article will not deal with those issues, since they lead to a set of very specific economic and legal problems that, again, have nothing to do with the specifics of agentic AI. Rather, the following deliberations will explore key areas to prevent foreclosure on markets for AI agents.

III. THE AI AGENTS' ACCESS TO TOOLS

One of the core features of an AI agent is its ability to connect with and operate tools. When it comes to assessing the contestability of the market for a certain agentic AI, it is therefore crucial to behold the ways and means of how such access is made in each industry. At this point it is expedient to zoom in on the technological architecture of this access. The established way of enabling web-based connection is via a machine-readable Application Programming Interface (API).[18] Whether or not to allow access via an API is decided by the operator of the tool. Some tools, like GitHub[19], provide public APIs which enable any agent to connect with it.[20] The coding agent *Devin* (*cognition*), for example, can connect with GitHub[21] and other tools.

Some tool operators, however, will be reluctant to provide an API, or not offer an API at all, like many public institutions.[22] In any event, each tool must open their service via API separately. Where the agent needs to connect with a large number of tools to perform its task, like searching for and booking hotels or flights from a number of hotel or airline booking sites, this can lead to a fragmentation problem. The provider of the AI agent would usually need to make an access agreement with each tool provider separately. Even though the coding capabilities of AI agents might render API interfacing and the translation of formats more efficient where a multitude of APIs is concerned[23], the owner of the tool might still restrict access. This is where platforms become relevant that consolidate APIs with several tools, such as booking platforms.[24] Such platforms can enable access to a large number of tools via their own API, thus serving as an entry point for the AI agent. From the competition

14 Like the objections raised against Amazon's proposed acquisition of iRobot, a producer of AI operated vacuum cleaners, U.S. FTC, Statement Regarding the Termination of Amazon's Proposed Acquisition of iRobot of January 31, 2024: https://www.ftc.gov/news-events/news/press-releases/2024/01/statement-regarding-termination-amazons-proposed-acquisition-irobot; Commission of 29 January, statement on abandonment of transaction Amazon/iRobot: https://ec.europa.eu/commission/presscorner/detail/en/statement_24_521.

15 Like the Commission's investigations in a potential foreclosure of WhatsApp as a distribution channel for rivalling AI providers, see Press Release 4 December 2025, Commission opens antitrust investigation into Meta's new policy regarding AI providers' access to WhatsApp: https://ec.europa.eu/commission/presscorner/detail/en/ip_25_2896; on interim measures imposed in that case on 9 June 2026 see https://ec.europa.eu/commission/presscorner/detail/en/ip_26_1276.

16 See, for example, Mohammad Sajjad Ghaemi, Emergent Collusion in LLM-Powered Multi-Agent Markets: A Comprehensive Survey of Risks, Mechanisms, Governance, and Regulatory Challenges (2025/2026): https://openreview.net/pdf?id=Hvkx9x2Qv5; see also Sara Fish/Yannai A. Gonczarowski/Ran I. Shorrer, Algorithmic Collusion by Large Language Models (2024/2026): https://arxiv.org/abs/2404.00806.

17 On these issues see Roman Inderst & Stefan Thomas, Algorithms and Antitrust: A Framework with Special Emphasis on Coordinated Pricing, 21 Journal of Competition Law & Economics 534-564 (2025), https://academic.oup.com/jcle/advance-article/doi/10.1093/joclec/nhaf014/8153641.

18 On the general working principles of APIs see Michael Goodwin, 9 April 2024, What is an API?, at: https://www.ibm.com/think/topics/api.

19 GitHub is a cloud-based platform that enables collaboration, hosting and versioning of code. It belongs to Microsoft.

20 See https://docs.github.com/en/rest?apiVersion=2026-03-10.

21 On combining Devin with GitHub see Devin's own information as provided here: https://docs.devin.ai/integrations/gh: "Integrating Devin with your GitHub organization enables Devin to create pull requests, respond to PR comments, and collaborate directly within your repositories. This allows Devin to function as a full contributor on your engineering team."

22 See ACTGSYS of 18 April 2026, AI Browser Agents in 2026: How SMEs Use AI Operators to Automate Back-Office Work: https://actgsys.com/en/blog/ai-browser-agent-operator-business-2026: "The most painful back-office work for Taiwan SMEs is government portals — Ministry of Finance e-invoice, labor insurance, MOEA Commerce, local tax bureaus. Most have no APIs. Traditional RPA requires custom scripts for each site with painful maintenance."

23 Samuele Marro & Philip Torr, LLM Agents Are the Antidote to Walled Gardens, 16 May 2026, p. 4: https://arxiv.org/abs/2506.23978.

24 Michael Goodwin, 9 April 2024, What is an API?: https://www.ibm.com/think/topics/api: "Travel booking sites aggregate thousands of flights, showcasing the cheapest options for every date and destination. APIs enable this service by providing application users access to the latest information about availability from hotels and airlines. This access is available either through a web browser or the travel booking company's own application. With an autonomous exchange of data and requests, APIs dramatically reduce the time and effort involved in checking for available flights or accommodation."

perspective, this highlights the role of such platforms for the accessibility not only of the upstream markets for, say, hotels etc., but also for the accessibility of the agentic AI market itself.

One way of bypassing the need for an API to connect with a tool can be to employ an AI agent which operates a web-browser like a human being.[25] This way, the agent can access platforms and internet sites in ways akin to a human being without the need for API.[26] Such AI-browser-agents are becoming more powerful and popular. OpenAI's "Computer-Using-Agent" (CUA)[27], Claude's "computer use"[28], or the open-source framework "Browser Use"[29] are only some examples. Their performance has increased substantially in the last three years thanks to progress in visual recognition and a reduction in token costs.[30] Some argue that AI-browser-agents can fundamentally shift power between platforms and users and undermine platforms' "traditional gatekeeping role" thanks to their eschewing the need for an API.[31] However, AI-browser-agents might still be restricted in their use of external tools, notably platforms. The operators of tools, such as sales platforms, may venture to ban such automated access in their contracts with users and try to enforce such by law. The pending litigation of Amazon against Perplexity aiming at restricting Perplexity's Comet AI agent from accessing the Amazon site by identifying as customers' activities via Google Chrome[32] demonstrates this issue.[33] Also, platform operators may employ technical countermeasures to hinder AI-browser-agents from accessing.[34]

In conclusion, access to tools, including the fragmentation problem, can become a relevant parameter in any competition analysis where agentic AI is involved. This article does not insinuate that every platform or API consolidator is per se obliged under antitrust law to grant access to AI agents, nor is it argued here that anticompetitive restrictions take place in practice. This article merely highlights the relevance of the issue. When assessing the incentives to foreclose agentic access, platform operators may also consider what effect a refusal to cooperate with agents may have on their own market position. Depending on how efficiently the fragmentation problem can be solved, AI agents might themselves develop into competitors of established platforms granting consumers direct access to the tools they want to operate, such as hotel bookings on the hotels' websites directly. Any platform operator will therefore likely balance any benefit of refusing access to its platform against the chance that such leads to a buildout of agentic competition to its own platform business.

IV. INTER-AGENT SWITCHING COSTS

A. Choice Between LLMs

For inter agent competition to exist, consumers need choice options. Since agents hinge on LLMs, access to models could, in theory, become a bottleneck. A limitation of inter-model competition could translate into a restriction of inter-agent competition. Currently, however, it is questionable whether competition between viable models is insufficient. Prominent operators of closed weight models, like OpenAI or Anthropic, are in competition. Those closed weight model operators offer access to commercial users including agentic AI providers. Importantly, competition from open weight models is intensifying. While open weight models have usually been somewhat behind the most advanced closed weight models,

25 See Raul Klugman-Onitza, Perplexity Comet: A Reversing Story, A deeper look into an agentic browser's inner workings, 11 February 2026: https://labs.zenity.io/p/perplexity-comet-a-reversing-story.

26 Samuele Marro & Philip Torr, LLM Agents Are the Antidote to Walled Gardens, 16 May 2026, p. 2: https://arxiv.org/abs/2506.23978: "A platform that chooses not to open its API can still be accessed by an agent that interacts with its web interface."

27 https://developers.openai.com/api/docs/guides/tools-computer-use: "Computer use lets a model operate software through the user interface. It can inspect screenshots, return interface actions for your code to execute, or work through a custom harness that mixes visual and programmatic interaction with the UI."; see also YouYoung Seo, AskUI of 31 March 2026, Claude Computer Use vs OpenAI Operator vs AskUI: https://www.askui.com/blog-posts/claude-vs-openai-operator-vs-askui.

28 Claude announcement of 22 October 2024, Introducing computer use, a new Claude 3.5 Sonnet, and Claude 3.5 Haiku: https://www.anthropic.com/news/3-5-models-and-computer-use.

29 See https://github.com/browser-use/browser-use.

30 ACTGSYS of 18 April 2026, AI Browser Agents in 2026: How SMEs Use AI Operators to Automate Back-Office Work: https://actgsys.com/en/blog/ai-browser-agent-operator-business-2026.

31 Samuele Marro & Philip Torr, LLM Agents Are the Antidote to Walled Gardens, 16 May 2026, p. 2: https://arxiv.org/abs/2506.23978.

32 *Amazon.com Services LLC v. Perplexity AI, Inc.*, Case Number: Amazon.com Services LLC v. Perplexity AI, Inc., 3:25-cv-09514, (N.D. Cal.), at: https://www.courtlistener.com/docket/71874820/amazoncom-services-llc-v-perplexity-ai-inc/.

33 On 9 March 2026, the U.S. District Court for the Northern District of California granted Amazon's motion for preliminary injunctive relief against Perplexity. On 16 March 2026, the Ninth Circuit Court of Appeals paused the injunction granting Perplexity an administrative stay, Appellate Court: Case No. 26-1444, U.S. Court of Appeals for the Ninth Circuit Judge: https://fingfx.thomsonreuters.com/gfx/legaldocs/byvrnryxdve/PERPLEXITY%20AI%20AMAZON%20LAWSUIT%209thcirstay.pdf.

34 On that see also Samuele Marro & Philip Torr, LLM Agents Are the Antidote to Walled Gardens, 16 May 2026, p. 5 et seq.: https://arxiv.org/abs/2506.23978.

the gap has shrunk. Depending on the intended use, the lag is estimated to be three months, or sometimes, like in software engineering, merely a sliver.[35] Some hold the view that the performance increase in open weight models demonstrates conceptual limitations of closed weight models and exerts competitive pressure on model incumbents.[36]

B. Choice Between AI Agents

This leads to choice options between the agents themselves. Lock-in effects can possibly result from the difficulties in data transfer. Agents will often become more efficient through personalization. The collection of personal user data, and a collection of interaction with tools when executing user tasks, will enable the agent to become more performative. When a user switches agents, it can be crucial for him or her whether the existing level of user-specific experience can be replicated with the new agent. This is where things can become technically challenging. Data portability, naturally, is an important aspect when it comes to limiting switching costs for consumers. There is an entire debate around the role of data portability, notably from the perspectives of the DMA (see its Article 6(9)), the GDPR (especially its Article 20) or antitrust law, as an element of workable competition in digital markets.[37] This article will not zoom into this legal debate. Instead, it is expedient to highlight the challenges that arise independent of any legal obligation to enable portability. The user data stack is employed in the ways as determined by the architecture of the agent, including the underlying model, and including additional contextual information the agent has accumulated beyond the mere user prompts. The old agent might have drawn on feedback it received from tools, and these tools might not be the same that are accessed by the new agent. This means that the same set of raw data, such as user prompts, will not necessarily lead to the same level of performance within the architecture of a new agent.[38] It is not the purpose of this article to engage in a deeper analysis of this issue and to explore ways to solve this from a technical perspective.[39] Again, the purpose here is merely to highlight this as a point that can feature in a deeper antitrust analysis when inter-agent competition is concerned.

V. CONCLUSION

This short overview is to demonstrate that agentic AI poses specific challenges for competition analysis thanks to the underlying architecture. An AI agent is a composition of distributed components. Depending on the ownership structure this can lead to a range of combinations for potentially diverging economic interests behind its employment. Inter agent competition is shown as an important feature to control that this architecture does not eventually harm consumer interests. In conclusion, this overview draws some skepticism on overly simplistic form-based solutions to the problem from an antitrust enforcement perspective. The ability to foreclose, the incentives to foreclose, and due account of potential efficiencies should be cornerstones of any analysis. Each of these factors can change quickly in a market scenario, given the developmental speed of agentic AI. Testament to the latter is, for example, the increasing capability of agentic-web-browser agents which can pose new challenges to established platform architectures.

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35 See Luke Emberson, Open-weight models lag state-of-the-art by around 3 months on average, 30 October 2025: https://epoch.ai/data-insights/open-weights-vs-closed-weights-models.

36 See the article by Dylan Patel /Afzal Ahmad, Google "We Have No Moat, And Neither Does OpenAI", which shows an alleged "Leaked Internal Google Document", 3 May 2023. This document appears to claim that, in the words of the article, "Open Source AI Will Outcompete Google and OpenAI". The alleged leaked document states: "The more tightly we control our models, the more attractive we make open alternatives. Google and OpenAI have both gravitated defensively toward release patterns that allow them to retain tight control over how their models are used. But this control is a fiction. Anyone seeking to use LLMs for unsanctioned purposes can simply take their pick of the freely available models.": https://newsletter.semianalysis.com/p/google-we-have-no-moat-and-neither.

37 On the fundamentals of data portability for competition assessment see Orla Lynskey, Aligning data protection rights with competition law remedies? The GDPR right to data portability, 42 European Law Review 793-814 (2017); Jeong-Yoo Kim, Data Portability and Interoperability Between Digital Platforms 21 May 2025, Journal of Economics & Management Strategy, https://onlinelibrary.wiley.com/doi/10.1111/jems.12643; Jan Krämer & Nadine Stüdlein, Data portability, data disclosure and data-induced switching costs: Some unintended consequences of the General Data Protection Regulation, 181 Economics Letters 99-103 (2019); Carolina Weber-Banda, Enforcing Data Portability in the Context of EU Competition Law and the GDPR, MIPLC Master Thesis Series (2016/17): https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3203289.

38 MindStudio Team of 9 April 2026, What Is Behavioral Lock-In? How Persistent AI Agents Create Switching Costs That Data Portability Can't Fix, the authors argue that "there's a form of lock-in that export functions can't touch" and which effectively cannot be captured by existing portability regulation. The authors call it "behavioral lock-in, and it happens when a persistent AI agent accumulates context about how your organization actually works — not the data you feed it, but the behavioral understanding it builds by operating inside your workflows day after day." (emphasis original): https://www.mindstudio.ai/blog/what-is-behavioral-lock-in-persistent-ai-agents-switching-costs. See also Ore Bakare (SmythOS), AI Lock-In: How to Avoid Getting Trapped in Proprietary LLM Ecosystems: https://smythos.com/ai-trends/how-to-avoid-ai-lock-in/.

39 On ways to reduce model lock in see Rahil Hussain Shaikh (acceldata), 12 February 2026, Hidden Costs in Agentic AI Contracts: What Vendors Don't Show: "To reduce lock-in, ensure your agents are built on open standards and maintain a clean, portable data layer through automated discovery. Avoid proprietary 'black box' features that don't allow you to export agent logic or contextual history. By keeping your data architecture modular, you retain the ability to switch vendors if performance or pricing no longer aligns with your goals.": https://www.acceldata.io/blog/hidden-costs-in-agentic-ai-contracts-what-vendors-dont-show.

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