

VI. Microsoft Used Predatory and Anticompetitive Conduct to Impede Other Platform Threats as Well, Thereby Further Entrenching Its Operating System Monopoly

A. Microsoft responded to the threat that Java posed to the applications barrier to entry by engaging in predatory and anticompetitive conduct

318. As explained, Java technology, both alone and in concert with non-Microsoft browsers, poses a threat to Microsoft's operating system monopoly because it holds out the possibility of an effective cross-platform middleware that can significantly reduce the applications barrier to entry.

i. See supra Part III.C.; ¶¶ 57-59.

319. Microsoft recognized the Java threat and, in conjunction with its effort to blunt the browser threat, engaged in a series of actions designed to interfere with the development, distribution, and usage of cross-platform Java.

319.1. Microsoft developed and then widely distributed, in part through Windows, a "polluted" version of Java that is not cross-platform.

i. See infra Part VI A.1.; ¶¶ 320-321.

319.2. Microsoft's purpose in creating and widely disseminating its version of Java was to fragment cross-platform Java and thus hinder the threat Java could pose to the applications barriers to entry.

i. See infra Part VI.A.2.; ¶¶ 324-326.

319.3. In addition to polluting Java, Microsoft engaged in anticompetitive conduct designed to cripple cross-platform Java.

i. See infra Part VI.A.3.b.(1); ¶¶ 330-332.

319.3.1. Microsoft, through its predatory campaign against Netscape,