

June 30, 2016

The Registrar  
Commerce Commission

Fairfax NZME merger

On behalf of Delza Reay Neben (majority shareholder in Times Newspapers Ltd) I register this submission against Wilson and Horton Ltd (trading as NZME) and Fairfax NZ Ltd who are seeking authorisation to merge their media operations in New Zealand.

A merger between the two largest media companies in the country is not in the best interests of the existing media industry and residents of this country.

If this merger is approved it will open up the possibility for:

- A monopolistic news service, covering radio and print.
- Digital news choices reduced to one source, ie currently Stuff and NZ Herald, only one will survive.
- A monopolistic approach to advertising sales with predatory pricing to the exclusion of independent publishers across NZ.
- Driving smaller independent publishers out of their respective areas and local community.
- A reduction in the quality and quantity of editorial scrutiny and content across the country.
- The reduction in employment opportunities in all publishing categories, and the resulting drop in training through the established and approved ITOs, i.e. a dumbing down of the industry .
- The 'Fourth Estate' was acknowledged as the eyes and ears of the residents of this country; to put the control in the hands of one company would be seen as a great injustice to all New Zealanders.



D.R.Neben