

**From:** [ ]  
**Sent:** Monday, 1 August 2016 4:31 p.m.  
**To:** Registrar  
**Subject:** Proposed merger - NZME / Fairfax

To whom it may concern:

A radio perspective

As the owner of a regional Radio Station I am authorized to provide insight as to the likely impact upon our business, should the Proposed NZME / Fairfax merger application be approved.

It would be fair to say that the core product resources for Radio are - Air & Time.

One element being infinite, the other finite.

Each element is provided for free every day thus in a competitive radio environment we all share common ground.

We provide a radio specific advertising platform that is affordable and effective at fair market rates for our local and regional clients. We do this with clear, transparent and unambiguous schedules. We sell every minute that we can.

Each unsold minute goes to provide commercial vibrancy to various not for profit entities within our community, along with the subsequent build-up of considerable social capital for our general population.

Local and regional revenue is the only source of income from which we may enhance and further develop our business viability. We do not share in any National revenue streams.

There is clear evidence from NZME / APN that print and radio bundling has taken place on an annual proposition basis whereby the radio element in the bundle is provided at no cost to prospective clients.

This could be seen as viable for the supplier, but that's okay because they got the time and the air for free, so it's worth nothing in the market place. There is it seems, no value attached to the On Air minute. We see this as being totally counter intuitive.

Logic suggests that when a radio product has no cost or value on it then there is no market!

The Radio Market is not permitted to work in a viable and Proper Manner.

Should such product bundling provided across multiple radio channels be permitted to continue, then the magnitude of such would be catastrophic on the viability and vibrancy of our business with a subsequent reduction in client choice and the loss of social capital.

We have no countervailing resources to mitigate against market power of that magnitude.