From:
Sent: Tuesday, 18 October 2022 4:39 pm
To: Misuse of Market Power Guidelines
Subject: Frontier Economics

Thank you for the opportunity to comment on the draft guidelines. I think the guidelines are clear, helpful and well-grounded in economics.

I think a few definitions could be improved:

51.1 It would be better to define economies of scale to allow for multi-product firms – as does the definition of the market in para 28. I suggest: Economies of scale: whereby increasing the scale of production by a factor, k, while holding the ratio of outputs constant, causes costs to increase by a factor less than k.

51.2 I suggest: Economies of scope: whereby the costs of producing two products in one enterprise are less than the sum of the costs of producing the same two products in two separate enterprises. 51.6 I suggest sunk costs are costs incurred upon implementing a decision that cannot be recovered when that decision is reversed.

These might seem like nit-picking; but they were all I could find to comment on.

My thanks and best wishes for the new s 36,

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