

COMMERCE ACT 1986: BUSINESS ACQUISITION

SECTION 66: NOTICE SEEKING CLEARANCE

24 August 2011

The Registrar
Market Structure Group
Commerce Commission
PO Box 2351
Wellington
registrar@comcom.govt.nz

Pursuant to section 66(1) of the Commerce Act 1986 notice is hereby given seeking *clearance* of a proposed business acquisition.

PART I: TRANSACTION DETAILS

1 The person giving notice

This notice is given by iSite Limited (*iSite*) as a nominee of the acquiring party, Infratil Outdoor Media Limited (*IOML*).

iSite Limited
202 Ponsonby Road
Ponsonby
PO Box 147002
Auckland

Telephone: +64 9 360 2327
Facsimile: +64 9 360 1429
Website: www.isitemedia.co.nz

Attention: Wayne Chapman

All correspondence and notices in respect of the application should be directed in the first instance to:

Chapman Tripp
10 Customhouse Quay
PO Box 993
Wellington

Telephone: +64 4 499 5999
Facsimile: +64 4 472 7111

Attention: Neil Anderson / Larissa Wall
 Email: neil.anderson@chapmantripp.com / larissa.wall@chapmantripp.com

2 **The other merger party**

The other merger party is O.T.W Advertising Limited (*OTW*).

<i>Physical address</i>	<i>Registered office</i>	<i>Postal address</i>
Suite 15, Level 3 The Textile Centre 1 Kenwyn St Parnell Auckland	C/-Withers Tsang & Co Ltd 24-26 Pollen Street Ponsonby Auckland	PO Box 37 319 Parnell Auckland

Telephone: +64 9 302 0180
 Facsimile: +64 9 302 0188
 Website: www.otw.co.nz

Attention: Mark Venter

3 **Ownership and control of the merger parties**

3.1 ***iSite/IOML***

Both iSite and IOML are wholly owned subsidiaries of Infratil Limited. Infratil Limited is listed in the NZSX market operated by New Zealand Stock Exchange Limited and has extensive shareholdings.

3.2 ***OTW***

OTW is 96% owned by SGBR Trustees Limited and 2% owned by Mark Venter and Mandie Skerrett, respectively. Mark Venter and Mandie Skerret each own 50% of SGBR Trustees Limited.

3.3 ***Pre- existing links between merger parties***

There are no pre-existing links between the merger parties.

4 **Details of the acquisition**

IOML wishes to acquire up to 100% of OTW's billboard assets in accordance with the Agreement for Sale and Purchase of Specified Assets (*the Agreement*) (attached at Appendix A). OTW's billboard assets correspond to 3% of the billboards in the 'out of home' advertising market (*OOH market*).

The assets consist of leases or licenses for billboard sites across New Zealand, third party advertising contracts that have not been fulfilled by OTW, consents held by OTW in relation to the billboard sites, and the plant, structures, framing, chattels, lighting and all other items owned by OTW for the purpose of displaying advertising on the billboard sites.

5 **Commercial rationale for the merger**

iSite considers that OTW's assets are complementary to the existing iSite portfolio. In particular, OTW has a number of sites that provide Auckland CBD presence – [

]. Increasingly, iSite has observed that advertising agencies (acting as intermediaries for advertisers) are launching national campaigns on behalf of their clients. Invariably, Auckland CBD presence is considered to be advantageous in the overall proposition. Similarly OTW, although a successful business in its own right under its existing business model, faces strategic challenges in terms of growing its competitive presence beyond its current niche. This merger would allow the merged iSite/OTW entity to compete more effectively than the two respective parties would otherwise. In short, the competitive sum of the parts as a merged entity will be greater than that which occurs when operating as two independent players.

6 **Merger documentation**

The Agreement is attached as Appendix A. Clause 3.1 states that the Agreement is conditional upon the clearance sought in this application.

7 **Overseas notification**

The merger parties have not notified any other jurisdiction's competition agency of the planned acquisition.

PART II: THE INDUSTRY

8 **Goods and services supplied**

iSite provides a range of OOH marketing services across a range of media, including billboards but also a range of transit and airport media and dynamic electronic media (primarily displayed indoors). The OTW business is primarily focussed on billboards and, as already explained in the section regarding commercial rationale for the merger, OTW's billboards are considered to provide iSite with greatly enhanced geographic coverage, thereby improving its competitive propositions.

9 **Affected industries**

The OOH marketing services industry will be affected by the proposed acquisition. This is because iSite and OTW are participants in the OOH industry, rather than the broader advertising industry. The OOH industry functions via relationships between advertising agencies, OOH advertising providers and property owners. The proposed merged entity will influence the nature and structure of these relationships in some instances. For example, by iSite increasing its presence in the billboards, it will be able to compete with APNO to a greater extent and provide advertising agencies and property owners with more alternatives.

10 **Industry trends**

The OOH market is a mature one in which the predominant mode of operation (billboards) is well understood and well supported. In many ways, recent changes in

technology, and in particular the use of technology by consumers, have improved the strategic positioning of OOH services within the aggregate set of advertising options. For example, the advent of smart phones, and in particular the ability to access the internet while mobile, gives rise to the opportunity to present OOH media as prompting consumption of advertised goods when the consumer is on the “path to purchase”. Would-be consumers can make purchases on the internet immediately upon seeing an advertisement published on a billboard.

The OOH medium is also perceived to have additional value because it is an “opt in” advertising channel, which contrasts with the interruption style of advertising prevalent with television and radio. Opt in advertising appeals more to younger generations who are accustomed to choosing their content, rather than having it dictated to them by a broadcaster. In addition, broadcast media advertising is becoming problematic in a world where “time shifting” facilities are available to consumers – for example, the ability to fast forward advertising sequences on MY SKY, TiVo or T-Box type technologies.

Another trend is the increasing requirements from advertisers for measurability of their advertising spend. This is prompted to some degree by the measurability of internet “hits”. Measuring the effectiveness of OOH spend is more problematic. While traffic numbers can be supplied with respect to relevant arterial routes, that has limited utility. Emerging technologies around measuring the effectiveness of OOH advertising will be key to its competitive positioning in the future.

11 **Recent merger activity**

The billboard aspect of the OOH market has been consolidated in the past three years through two mergers. In 2008, APNO acquired Media1. Further, APNO has made the recent acquisition of OGGI Advertising Limited in June 2011.

PART III: MARKET DEFINITION

12 **Horizontal aggregation**

12.1 **Product market**

In a broad sense, OOH advertising providers compete with participants in the advertising industry such as television, radio, newspapers, magazines etc. However, each part of the advertising industry has its specific features, with differing competitive strengths and weaknesses in particular circumstances. For example, OOH advertising is aimed at providing effective visual messages. The wide range of forms in the advertising industry provide competitive constraints on each segment, including OOH advertising, as the advertiser may have flexibility as to whether television, radio or OOH advertising is used and so OOH providers compete, at the margin, with all competitors in the advertising industry.

To some extent, the different segments of the advertising industry are complementary in the sense that the varying forms of advertising can be used together in a portfolio to support a broad campaign. For example, television could

be the primary form for an advertising campaign and this may be supported by OOH advertising which is used as a "path to purchase" by triggering a memory of the primary advertisement, emphasising the key aspects of the advertisement, or encouraging action. Still, there is fierce competition among various modes of advertising to secure a greater share of the overall mix. In particular, if the provider of any specific option attempts to raise price, it would do so expecting to lose market share.

OOH advertising has typically been viewed to sit in a different product market to the other segments of the advertising industry as a whole. Of the total turnover of the advertising industry, approximately 3% is derived from OOH advertising whereas television accounts for 28%, radio advertising for 11%, newspaper advertising for 29%, magazine advertising for 10%, digital/online for 12% (and increasing all the time), and the remaining turnover comprises other forms of advertising.

The OOH market operates through a range of distinct media, such as:

- billboards;
- advertisements in bus shelters ("street furniture");
- advertisements in airports/railway stations ("airport advertising");
- advertisements on the outside of buses; and
- other niche areas such as ambient displays.

OOH advertising providers typically derive approximately 80 - 90% of their revenue from advertising agencies. The form of OOH advertising (i.e. the type of advertising used, such as billboards or street furniture) and the extent used by the advertising agents depends on the specific objectives of their customer's campaign and spend, and perceptions of the likely effectiveness of specific strategies. OOH advertising is typically considered as a package and will include a range of media which are sometimes shared amongst competitors. For example, APNO may provide the billboard services and iSite may provide the airport advertising services.

It is therefore submitted that the product dimension of the relevant market should be treated as OOH advertising.

We note that in 1998, the market in *Decision 321* was defined as "outdoor advertising". It is our opinion that the product market has evolved since 1998 and has expanded beyond "outdoor" mediums and static inventory to interactive mediums, including indoor placements, and will continue to expand in this regard. For this reason, the product market is more accurately described as "out of home".

12.2 **Functional level**

The OOH market functions via relationships between the 'property owners' (i.e. owners of the land, building, vehicle etc used to place the advertisement), the OOH advertising provider such as iSite, APNO, OTW, Adshel etc, and the advertising agencies.

The OOH advertising providers interact with the property owners in terms of obtaining leases or licences to advertise on the land, building etc in return for either a fixed rental fee, a minimum guarantee plus wash up, or on a commission basis. The advertising agencies interact with the OOH advertising providers, often by issuing briefs about the details of the campaign such as the desired form, time period and locations. The OOH advertising providers respond to the briefs by outlining the available forms of advertising, locations and costs that the OOH advertising provider can supply to meet the advertising agent's requirements.

The OOH advertising provider thus functions at the service level, using the property owner's resources to supply a product for the advertising agents. There are also direct dealings between OOH providers and advertising. This is particularly the case for niche operators of a small number of sites, which may directly target specific advertisers.

The proposed acquisition only affects the service level of the OOH market as it involves the aggregation of two OOH advertising providers.

It is noted that both iSite and OTW currently perform in different functional levels. This is elaborated in paragraph 14 below.

12.3 **Geographic area**

By virtue of the operation of the OOH market, that is the interaction between property owners, OOH advertising providers and advertising agencies, the OOH advertising market has national scope.

Although some market participants only operate in specific geographic areas and some campaigns are focussed on limited areas, many participants and campaigns are conducted nationwide. There are no constraints on market participants to expand from limited geographic areas to a national basis.

12.4 **Customer dimension/timeframe**

There is no specified timeframe for the OOH market and the customer dimension is not relevant to the boundaries of the market.

13 **Product differentiation**

The OOH advertising products can be differentiated within the market by form, size, quantity and location. Each of these factors are essentially driven by price. For example, the largest billboard in the prime location for the specific advertisement campaign will have a high impact and will accordingly be reflected in the price.

Advertising agencies sometimes seek a range of products for one campaign so that the range of audiences affected by the specific forms and locations are captured by the one campaign. For example, billboards, street furniture and bus advertising may be used.

There is significant potential for product differentiation in the OOH market in the future. In particular, as technology continually advances, the use of digital billboards and interactive forms of advertising is likely to increase, meaning that the OOH market will continue to evolve. This dynamic aspect of the OOH market is illustrated by the growth of the digital/online aspect of the market, increasing from approximately 2% of the total turnover of the advertising industry in 2005 to 12% in 2010. That substantial growth is expected to continue for some time.

14 **Vertical integration**

iSite is vertically integrated in the OOH market. It competes at the property owner level as it is a wholly owned subsidiary of Infratil who in turn, is a majority shareholder of WIAL. iSite has a contract with WIAL for the provision of OOH advertising services. Infratil are also owners of NZBus and iSite uses NZBus inventory for OOH advertising.

OTW is also partially vertically integrated as Mark Venter (or entities associated with him) controls the title to 6 of OTW's 72 billboard sites and is thus performing at both the property owner and service provider functional levels.

However, the proposed acquisition effectively, if anything, reduces vertical integration as Mark Venter (or entities associated with him) will continue to be the property owner for any of his sites on which OTW currently locates billboards.

PART IV: COUNTERFACTUAL

15 **The counterfactual scenarios**

In the event that the proposed acquisition does not take place, it is likely that the billboard aspect of the OOH market will nonetheless be consolidated. This conclusion is drawn by the analysis of three possible counterfactual scenarios, as follows:

(a) **Status quo**

OTW could remain as a competitor in the OOH market by maintaining its billboard assets. However, the owners of OTW have expressed a desire to exit the OOH market to explore other business interests. This indicates that it is unlikely OTW would hold onto its billboard assets and maintain the status quo.

(b) **Beach head**

A multinational player could seek ownership of OTW's billboard assets thus relieving OTW of its commercial challenges but without imposing consolidation

of the market. However, it is unlikely that a multinational player would enter the billboard aspect of the market via the minimal share of 3%. Entry by such a player is more likely to occur via the purchase of either iSite or APNO.

(c) **APNO purchases OTW**

APNO has expressed a qualified interest, both directly and through a merchant banker intermediary, to acquire OTW. The previous two mergers in the industry indicate that APNO has a strong appetite for billboards. It is therefore likely that if the proposed acquisition does not go ahead, APNO will purchase OTW's billboard assets, subject to Commerce Act approval. This scenario would further entrench APNO's head position in the market and would likely be a less competitive outcome than purchase by iSite.

PART V: COMPETITION ANALYSIS

16 Existing competitors

The main competitors involved in providing OOH advertising products such as billboards, street furniture, bus advertisements and airport advertising are: APNO, iSite, Roadside Attractions, Adshel, Eyecorp and M5. Competitors of a smaller scale are Big Picture, Interspace and JAM.

However, competition in the OOH market is not only provided by large players, but also competitors that are involved in OOH advertising through very specific realms. Examples of such competitors include Ambient who advertise in gyms and on foodcourt table tops; SmartMove who provide advertising in the form of wrapped 'Smart cars'; Adzup which provides event signage; Monstavision which provides digital large format screen activity; and Taxi Media which arranges advertising on taxis. New entry into niche areas such as these is very prominent and we expect this kind of activity to continue.

All of these competitors could readily expand or redeploy existing capacity should the existing suppliers raise prices or reduce output or quality and the existing competitors provide a range of alternatives for customers.

17 Market share data

The estimated market share of iSite's competitors in the OOH market and the billboard aspect of the market are outlined in the tables below.

Estimated OOH Market Share

RANK	COMPETITORS (INCLUDING MERGER PARTIES)	ESTIMATED REVENUE	ESTIMATED % OF MARKET SHARE BY REVENUE	ESTIMATED VOLUME	ESTIMATED % OF MARKET BY VOLUME
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1	iSite	[]	[]		
2	APN Outdoor	[]	[]		
3	Adshell	[]	[]		
4	Eye corp	[]	[]		
5	Roadside	[]	[]		
6	OTW	[]	[]		
7	Others	[]	[]		

Estimated market share of billboards

RANK	COMPETITORS (INCLUDING MERGER PARTIES)	ESTIMATED REVENUE	ESTIMATED % OF MARKET SHARE BY REVENUE	ESTIMATED VOLUME	ESTIMATED % OF MARKET BY VOLUME
1	APN	[]	[]	550	42.5%
2	iSite	[]	[]	412	31.9%
3	Eye corp	[]	[]	18	1.4%
4	Roadside	[]	[]	132	10.2%
5	OTW	[]	[]	70	5.4%
6	M5	[]	[]	79	6.1%
7	Advantage	[]	[]	32	2.5%

The proposed acquisition will only result in a 1.6% increase in iSite's market share in the national OOH market, and a 3% increase in iSite's market share in billboards. The acquisition will not alter the market share of any of the street furniture, bus advertising or airport advertising aspects (illustrated in Appendix B). The proposed acquisition thus constitutes a very minor aggregation of market share and will therefore not affect the current balance in the OOH market that allows for both large and small players to provide effective competition.

It is acknowledged that in *Decision 321* the applicant expressed that the total number of sites is not an accurate determinant of market share in the billboard aspect of the market and that the location and occupancy rates of the sites are relevant factors. It is not disputed that a key aspect in an advertiser's decision to use OOH advertising is the location of the billboard and that consequently, occupancy rates relate to location. However, a range of other factors such as geography, price, quantity and size also have a significant impact on the dynamics of billboards. These complex factors should all be accounted for in assessing the competitive dynamics of billboards but it is submitted that each factor is not easily quantified and can therefore not be considered as conclusive determinants of market share. There is no prescribed formula on how to deal with each facet of the billboard dynamics other than to stand back and review the whole scope of variables from a reasonable and practicable perspective. Nonetheless, the ownership of billboard sites will continue to be spread across market participants post-merger and thus billboards will continue to be competitive in the OOH market.

However, the proposed acquisition does place the OOH market shares outside the safe harbours. In the OOH market, iSite and APNO/Adshel (Adshel is owned by a joint venture between APNO and Clear Channel International) have 72.9% market share. The merged entity will have a market share of 33%, thus falling outside the safe harbour of 20%. It is out of respect for these safe harbours that the application for clearance has been sought, rather than any substantive concern for the effect on competition in the OOH market.

18 **Constraint of competitors**

The merged entity would be constrained in its actions by the conduct of existing competitors in the OOH market.

The substitutability of products within the OOH market allows customers to switch between suppliers with ease. The transient nature of advertising provides customers with many opportunities to use a range of products. For example, billboard campaigns tend to run in monthly cycles where as adshel advertisements are fortnightly and buses, weekly. This means that the advertising agencies can vote with their feet if they are unhappy with the service being provided by an OOH advertising provider and either use a different form of OOH advertising and/or change advertising providers.

Local or overseas firms could enter the OOH market as a service provider relatively quickly. Where a firm has existing productive capacity it is simply a matter of establishing the relationships in the operation chain between the property owners and advertising agencies. Similarly, the market is very open to expansion by competitors in terms of the form of advertising, quantity and geographic areas.

The OOH market dynamics are very fluid with regards to market share and inventory. This is because licences and leases are not perpetual. Therefore, existing competitors are required to focus on retention of current inventory, as well

as acquisition, as competitors or new entrants impose a threat to the renewal of inventory and consequently provide competitive constraint.

19 **Potential Competition**

19.1 ***Conditions of entry***

The requirements for new entry are minimal. Anybody could enter the market provided they have the necessary capital and appetite for the industry. For example, all property owners with wall space could remove the intermediary in the process and develop a direct relationship with advertising agencies. It is submitted that a potential illustration of such entry is the advertising in the Westfield Malls. For advertising purposes, Westfield currently trade under “Westfield BrandSpace” (WBS) and operate through OOH advertising providers. However, OOH advertising providers are always conscious that when presenting a competitive proposition, WBS could consolidate its advertising assets, bypassing the OOH advertising providers and operating directly with the advertising agencies.

Resource consents are required in some circumstances but this is not considered a significant barrier to entry.

20 **New entry**

20.1 ***What factors could impede new entry***

It is not obvious that there are any specific factors impeding new entry into the OOH market.

20.2 ***What factors could prompt new entry post merger***

The circumstances of prompting new entry post-merger are not likely to be substantially different to pre-merger. The prompt is likely to come from poor performance by the OOH advertising provider and consequently, a desire to change or remove the intermediary.

New entry may also be prompted by an open market tender for multiple existing sites. This provides new entrants with an opportunity to enter the market at a considerable level, without being required to have significant existing inventory. An example of this is the 2007 KiwiRail Network contract which comprised over 100 billboard sites. Furthermore, tenders of airport advertising provide significant opportunities to enter the market with immediate scale – as normally in any airport there are a multitude of physical locations amenable to OOH advertising.

21 **Likelihood, extent and timeliness of entry**

There are a number of multinational firms (such as JC Deceaux and Ooh!), indirect competitors and direct competitors, in the OOH market that we consider would likely expand if there was an increase in demand. Similarly, it is likely that market participants in the property owner level of operation such as building owners and airports would remove the intermediary and enter into the service level. De novo entry is also very likely given the low barriers to entry.

22 **Extent of constraint**

It is not likely that the threat of new entry would be enough of a constraint alone to prevent significant increases in prices. However, the threat of new entry combined with the constraint of existing competitors, countervailing market power of advertising agents and the ability for the operation of the supply chain to be changed by property owners in-sourcing, collectively provide significant constraint on OOH advertising providers.

23 **Timeliness of entry**

The timeframe for new entry is merely a question of resources. With the required capital, it is submitted a de novo entrant could be set up relatively quickly, approximately 3-6 months.

24 **Countervailing power of buyers**

The advertising agencies have significant countervailing power by virtue of the vast array of substitutable factors such as location, form of advertising, size, quantity and occupancy periods. For example, an alternative to a large Auckland CBD billboard advertisement for a month long campaign may be an Auckland CBD bus advertisement combined with a range of smaller billboards on the fringe suburbs for 6 weeks. These prominent alternative sources of supply grant the advertising agencies with countervailing power to influence the dynamics with the advertising providers.

As mentioned above, buyers can also use their countervailing power to offer open market tenders, consequently providing opportunities for existing or new competitors to gain significant market share.

25 **Identified buyers**

iSite's top 5 buyers by volume are[

].

26 **Coordinated market power**

As outlined in paragraph 15(c) the counterfactual is that APNO purchases OTW's billboard assets. As APNO is already the largest player in the billboard aspect of the market, the proposed acquisition facilitates competition by increasing iSite's ability to compete with APNO and preventing APNO from gaining an even greater market share.

In any case, the OOH market is not an environment which allows for the exercise of coordinated market power because of the vast range of alternatives available. If a customer was being subjected to coordinated market power, they would simply redeploy their spend to alternative providers and/or forms of advertising and locations.

27 Efficiencies

The efficiencies likely gained by the proposed acquisition are twofold. First, although OTW could continue to provide competition in the OOH market as a standalone competitor, the OTW inventory will be more effectively deployed under the merged entity. The proposed merger will provide an advanced comprehensive competitive effect and will consequently increase efficiencies in the market.

Second, iSite's increased scale of competitiveness in the market as a result of the merger will increase its ability to invest in research, thus contributing to the dynamic efficiency of the market. A focus in this area may include the measurability of the effectiveness of the various factors of OOH advertising. The modes and techniques of advertising are continually advancing yet the measurability of what works for the New Zealand industry is currently quite weak.

PART VI: FURTHER INFORMATION AND SUPPORTING DOCUMENTATION

28 Contact details

Contact details for certain competitors, buyers and suppliers and other relevant market participants are set out in the table below.

	NAME OF COMPANY	CONTACT DETAILS	RELEVANT CONTACT PERSON
	BOTH LEGAL AND TRADING NAMES	POSTAL & PHYSICAL ADDRESS, TELEPHONE AND FAX, WEBSITE	NAME, POSITION AND CONTACT DETAILS INCLUDING TELEPHONE, FAX, EMAIL
COMPETITORS	APN Outdoor Limited	Level 3, 117-125 St Georges Bay Road, Parnell, Auckland 1052 P O Box 37798 Parnell 1151 Phone: 09 303 5400 Fax: 09 303 5401 Email: phil.clemas@apnoutdoor.co.nz	Phil Clemas – General Manager Phone: 09 303 5400 Fax: 09 303 5401 Email: phil.clemas@apnoutdoor.co.nz
	Eye Corp New Zealand Ltd	Suite 3, Level 1, 22-26 New North Road, Eden Terrace, Auckland Phone: 09 307 9160 Fax: 09 377 1567 Email: camerontaylor@eyecorp.com www.eyecorp.co.nz	Cameron Taylor – Sales Manager Phone: 09 307 9160 Fax: 09 377 1567 Email: camerontaylor@eyecorp.com

	Adshel New Zealand Limited	33 Garfield Street, Parnell, Auckland 1052 P O Box 4090 Shortland Street Auckland 1140 Phone: 09 377 5595 Fax: 09 379 6245 www.adshel.co.nz	Nick Vile – Sales Director Phone: 09 377 5595 Fax: 09 379 6245
	Roadside Attractions	P O Box 17644 Christchurch New Zealand Phone: 03 384 8729 Fax: 03 384 8728 www.roadside.co.nz	Sean Barry Phone: 03 384 8729 Email: sbarry@roadside.co.nz
BUYERS	[]	[]	[]

	<p>Ogilvy New Zealand Limited</p>	<p>22 Stanley Street Parnell Auckland</p> <p>P O Box 4567 Shortland Street Auckland 1140</p> <p>Phone: 09 358 5752 Fax: 09 358 5762</p> <p>www.ogilvy.co.nz</p>	<p>Sam Osbourne – Business Director</p> <p>Phone: 09 358 8231 Email: Samantha.Osbourne@ogilvy.co.nz</p>
	<p>OMD New Zealand Ltd</p>	<p>Ground Floor 33 College Hill Freemans Bay 1011 Auckland</p> <p>P O Box 3709 Auckland</p> <p>Phone: 09 353 7440 Fax: 09 353 8303</p> <p>www.omb.com/locations/nz</p>	<p>Andrew Reinholds – Managing Partner</p> <p>Phone: 09 353 7453 Email: Andrew.Reinholds@omb.com.nz</p>
<p>[]</p>	<p>[]</p>	<p>[]</p>	<p>[]</p>

	[]	[]	[]
SUPPLIERS	Boston Digital Holdings Limited	<p>34 Westmoreland Street Grey Lynn</p> <p>P O Box 78070 Grey Lynn Auckland 1021</p> <p>Phone 09 360 5700 Fax: 09 360 5702</p> <p>www.bostondigital.co.nz</p>	<p>Craig Polley – Executive Director</p> <p>Phone: 09 360 5700 Email: craig@bostondigital.co.nz</p>
	Omnigraphics Limited	<p>10 Normanby Road Mt Eden Auckland</p> <p>P O Box 108 176 Symonds Street Auckland 1150</p> <p>Phone: 09 638 0888 Fax: 09 638 3933</p> <p>Email: enquiries@omnigraphics.co.nz</p>	<p>Steve Spear – General Manager</p> <p>Phone: 09 638 0888 Email: steve@omnigraphics.co.nz</p>

	Billboard Solutions Limited	P O Box 307001 Windsor Park Mairangi Bay Phone: 09 478 4340	Chris McManaway – Owner/Operator Phone: 09 478 4340 Email: Chris@billboardsolutions.co.nz
	Skin Tight Limited	64 Te Henga Road Bethells Beach Phone: 09 810 7078	Karl Danby Phone: 09 810 7078 Email: Karl@skintight.co.nz
	Advanced Engineering Services Limited	31 Timothy Place, Avondale, Auckland, 1026, New Zealand Phone: 09 828 9664 Fax: 09 828 1045 www.aesparts.co.nz www.zebratti.co.nz	Stuart Wilson – Managing Director Phone: 09 828 9664 Email: stu@aesparts.co.nz
TRADE ASSOCIATIONS	Outdoor Media Association New Zealand	P O Box 128-574 Remuera Auckland 1541 New Zealand Phone: 09 571 0195 Fax: 09 528 0764 www.omanz.org.nz	Phil Clemas Phone: 09 303 5400 Fax: 09 303 5401 Email: phil.clemas@apnoutdoor.co.nz
ANY OTHER RELEVANT MARKET PARTICIPANTS OR INTERESTED PARTIES	Wellington International Airport Limited	Stewart Duff Drive Rongotai Wellington P O Box 14175 Wellington Phone: 04 384 5157 Fax:04 384 5139 Email: mail@wellingtonairport.co.nz www.wellingtonairport.co.nz	Martin Harrington – Chief Financial Officer Phone: 04 384 5157 Email: Martin.Harrington@wellingtonairport.co.nz

	Queenstown Airport Corporation Limited	P O Box 2641 Queenstown 9349 Phone: 03 450 9031 Fax: 03 442 3515 Email: admin@airportservices.co.nz www.queenstownairport.co.nz	Simon Barr – General Manager Commercial Phone: 03 450 9031 Email: simon@queenstownairport.com
	Kiwi Property Management Limited	Level 14, DLA Phillips Fox Tower National Bank Centre, 205-209 Queen Street Auckland, New Zealand Kiwi Income Properties Limited P O Box 2071, Shortland Street Auckland 1140, New Zealand Phone: 09 359 4000 Fax: 09 359 3997 Email: Imsenquiries@linkmarketservices.com www.kipt.co.nz	Nicolette Campbell – Retail Property Manager Phone: 09 359 4047 Email: Nicolette.Campbell@kipt.co.nz
	AMP Capital	AMPC Brand & Retail Solutions 588 Chapel Road, Botany Downs Auckland Phone: 09 8262 327 www.ampcapitalshopping.com	Elizabeth Davidson – Retail Solutions & Corporate Account Coordinator, AMPCSC Brand & Retail Solutions Phone: 09 8262 327 Email: Elizabeth.davidson@ampcapital.com

29 **Annual reports**

iSite's March 2011 Annual Report is attached at Appendix C.

PART VII: CONFIDENTIALITY

30 **Confidentiality**

Pursuant to section 9(2)(b)(ii) of the Official Information Act 1982, iSite requests confidentiality in respect of the specific information set out in Appendix D on the basis that the making available of the information would be likely unreasonably to prejudice the commercial position of iSite.

That information is square bracketed from this confidential version of the application and redacted from the public version of the application (provided together with this application).

31 **Schedule of confidential information**

This notice is given by iSite Limited:

iSite Limited hereby confirms that:

- all information specified by the Commission has been supplied;
- if information has not been supplied, reasons have been included as to why the information has not been supplied;
- all information known to the applicant which is relevant to the consideration of this application/notice has been supplied; and
- all information supplied is correct as at the date of this application/notice.

iSite Limited undertakes to advise the Commission immediately of any material change in circumstances relating to the application/notice.

Dated this day of 2011.

Signed on behalf of iSite Limited:

By Wayne Chapman (Chief Executive Officer)

APPENDIX A: Agreement for Sale and Purchase of Specified Assets

[Confidential]

APPENDIX B: Illustration of market share's

[Confidential]

APPENDIX C: Annual Report

[Confidential]

APPENDIX D: Schedule of Confidential Information

[Confidential]