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**From:** Kirsty (Macnicol) Pickett <kirsty@advocatesouth.co.nz>  
**Sent:** Monday, 24 June 2019 12:05 PM  
**To:** Registrar  
**Subject:** Merger application Mainland Print Ltd; Inkwise Ltd

To whom it may concern,

My husband David Pickett and I are the directors of Advocate Communications Ltd, publisher of Advocate South, Southland's only locally-owned commercial newspaper, which is printed by Inkwise.

We have just recently been made aware that the Commerce Commission has been considering a clearance application from Mainland Print Ltd to acquire the heatset and coldest web offset printing assets of Inkwise Ltd.

We realise that we are too late to make any formal submissions in relation to this, however, our company has been named in the documents relating to this application and we are concerned that some of the information presented in response to clause 3 of the Letter of Issues (20<sup>th</sup> May 2019) is not an accurate representation of our operation, potentially downplaying the impact of the proposed acquisition on our business.

Mainland Print's response to the Commission's Letter of Issues (4<sup>th</sup> June 2019) identifies Advocate South (clause 19.2) as a "Fiordland" publication and in clause 21 says it is highly unlikely that Allied Press would be a strong constraint for these publications given their proximity to the Stuff and Inkwise Presses.

This is incorrect.

While our head office is based in Te Anau (Fiordland), we also maintain an office in Invercargill and the Advocate South publication serves the entire Southland district (as defined by local government territorial boundaries). Fiordland represents just 15% of our coverage/distribution area. Advocate South's primary competitor is the Southland Express, published by Allied Press, and to a lesser extent the Ensign (also owned by Allied Press) in a handful of areas where we distribute inside the Gore District boundary. Our other print competitors are The Southland Times (Stuff), the Otago Daily Times (Allied Press) and Southern Rural Life (Allied Press).

Currently our only options for printing are Allied Press in Dunedin, Inkwise at Rolleston, or Stuff at Christchurch. Of these three options, only Inkwise does not also own competing news publications. All three are some considerable geographical distance to our distribution area. Given that distance and the small number of options available to independent publishers, the decision on where to have our product printed is not just affected by price but also (in the time-sensitive and competitive news business) print deadlines and the subsequent delivery windows available to get the newspapers from the printing presses and into our readers' hands. If our only printing options were at presses owned by our newspaper competitors, there would be nothing to stop them aligning printing timetables with distribution networks in favour of their own products.

We hope this clarifies our position in the market, and we are more than happy to answer any further questions you may have.

Yours faithfully,

Kirsty Pickett.

Kirsty (Macnicol) Pickett | Editor

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