

## **COMMERCE ACT 1986: BUSINESS ACQUISITION**

### **SECTION 66: NOTICE SEEKING CLEARANCE**

17 November 2010

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

### **PUBLIC VERSION**

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

### **EXECUTIVE SUMMARY**

#### **Proposed acquisition**

In this application, Christchurch International Airport Limited (*CIAL*) seeks clearance to acquire the shares or the business and assets of Craddocks Car Storage (*Craddocks*) (owned and operated by PMW 2000 Limited).

Craddocks owns and operates a high security car storage facility supplying parking and other value added services to users of Christchurch International Airport. These value added services include valet, on-site vehicle grooming, vehicle servicing, warrant of fitness, re-fueling, and panel and paint repairs.

The car storage facility is located approximately 1500 metres from the airport terminals and has capacity for approximately [ ] vehicles.

#### **Commercial rationale**

Value added parking services (e.g. valet, car grooming) are currently provided by five organisations, with [ ].

CIAL does not provide value-added parking services – it provides only a basic parking service with three tiers of pricing which are determined with reference to proximity to the terminal and shelter. By offering value-added parking services, CIAL can give its customers greater options and provide an improved service. The acquisition will allow CIAL to compete in an area where it currently does not compete.

[

].

### **Competition analysis**

The relevant market for the purposes of this application is the market for travel to and from Christchurch International Airport.

Airport users decide how best to get to and from the airport given their personal circumstances and preferences. The options are many. An airport user may choose to catch a taxi, shuttle or bus, rent a car, have someone drop them off or pick them up, walk, cycle, drive and park for free in a nearby street, or drive and park for a fee at a parking service provider.

Competition in this market is rigorous. There is competition between modes of transport (inherent in the consumer choice, for example, between catching a taxi or driving and parking) and between individual competitors in each mode of transport. Because of the substantial number of transport options and individual competitors, consumers are presented with a number of methods of transport to and from the airport which will suit their individual circumstances and preferences in respect of price, quality and service offering.

By acquiring Craddocks, CIAL is seeking to enter into two parts of this overall market in which it currently has no presence – remote parking (budget parking in the eyes of the consumer) and the provision of value-added services. [

].

In addition to the current rigorous competition in this market, the threat of new entry in all transport options is real. The barriers to entry by taxis, rental vehicles, drop-offs and even additional bus routes are very low. [

].

The high degree of demand side substitutability limits the influence of any one supplier or segment in the market.

## **PART I: TRANSACTION DETAILS**

### **1 The person giving notice**

The acquirer is Christchurch International Airport Limited.

This notice is given by:

Andy Lester  
General Manager, Operations and Infrastructure  
Christchurch International Airport Limited  
PO Box 14001  
Christchurch Airport  
Christchurch

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

Christchurch International Airport Limited  
PO Box 14001  
Christchurch Airport  
Christchurch

Attention: Tania Pearson  
Telephone: 03 353 7046  
Fax: 03 353 7730  
Email: tania.pearson@cial.co.nz

## 2 **The other merger parties**

The target business is Craddocks (owned and operated by PMW 2000 Limited).

The contact person for Craddocks is:

Paul Whiting  
PMW 2000 Limited  
PO Box 14 010  
Christchurch Airport

Craddocks requests that all correspondence is directed in the first instance to:

Paul Whiting  
PMW 2000 Limited  
PO Box 14 010  
Christchurch Airport

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

### **CIAL**

CIAL is majority owned by Christchurch City Holdings Limited (75%), with the Minister for State-Owned Enterprises and Minister of Finance each owning a 12.5% share.

Christchurch City Holdings Limited is wholly owned by Christchurch City Council.

The Commission will be familiar with CIAL and its business activities from the regulation of airports under Part 4 of the Commerce Act 1986.

### **Craddocks**

Craddocks is owned by:

- Paul David Whiting of 72A Avonhead Road, Christchurch (3499 shares)
- William Joseph Bede Craddock of 56 Solway Avenue, Christchurch (1001 shares)
- Maree Ellen Whiting of 72A Avonhead Road, Christchurch (500 shares).

Paul David Whiting and William Joseph Bede Craddock are the directors of Craddocks.

Further information about Craddocks can be found at:

[www.craddockscarstorage.co.nz](http://www.craddockscarstorage.co.nz)

### 3.1 **Pre-existing links between the merger parties**

Craddocks operates on land leased from CIAL [ ].

CIAL provides a key collection and drop off service through CIAL's Travel and Tourism for vehicles left in the CIAL's car parks during Craddocks non-operational hours (i.e. either Craddocks customers dropping cars off after hours or Craddocks parking cars to be collected after hours). Craddocks' customers and/or Craddocks are required to pay existing parking tariffs for the time the vehicles are left in CIAL's car parks.

## 4 **Details of the acquisition**

CIAL seeks clearance to acquire the shares or the business and assets of Craddocks.

## 5 **Commercial rationale for the merger**

The commercial rationale for the proposed acquisition of Craddocks is broadly as follows:

- CIAL currently provides a basic airport parking service with three tiers of pricing which are determined with reference to proximity to the terminal and shelter. The price brackets determine whether a particular area is more suitable for short term or long term parking.

- CIAL does not currently provide any value-added parking services.

- [

].

- [

].

- There are efficiencies to be captured by combining the Craddocks business with the existing CIAL parking business, and opportunities to optimise use of existing CIAL assets. [

]. Craddocks also has the expertise and know-how in providing value added services [

].

This is not part of an international merger.

**6 Merger documentation**

[

].

**7 Overseas notification**

The merger parties have not notified any other competition authorities of the planned acquisition.

**PART II: THE INDUSTRY**

**8 Goods and services supplied**

CIAL owns and operates Christchurch International Airport. CIAL supplies aeronautical services (regulated under Part 4 of the Commerce Act 1986) and non-aeronautical services.

An aspect of CIAL's non-aeronautical services is the provision of parking spaces to users of Christchurch International Airport. CIAL offers a basic airport parking service with three tiers of pricing which are determined with reference to proximity to the terminal and shelter. The price brackets determine whether a particular area is more suitable for short term or long term parking (with the third pricing tier being a premium service – the premium aspects being proximity and shelter).

Craddocks supplies a high security car storage facility to users of Christchurch International Airport, offering indoor and outdoor parking. Craddocks occupies approximately [ ] on the airport campus. CIAL estimates that Craddocks offers [ ].

Craddocks also offers a number of value-added parking services: [

].

**9 Industries affected by proposed merger**

The proposed acquisition relates to transport services for airport users to get to and from Christchurch International Airport.

The industry offers a wide selection of choices for travel to and from the airport including taxis, shuttles, public buses, car rentals and parking for private vehicles.

The industry has well-developed price points and several service level offerings.

## 10 **Industry trends**

[

].

A common trend for transport to and from airports across New Zealand has been tailoring offerings to meet market demand. Not all customer decisions are made on the same criteria i.e. price to one customer may be less important than convenience where another may be driven by price or brand. The need to cater to customer demands and the competitive pressure from alternative modes of transport has meant that providers of parking services are constantly adapting and developing innovative technological advancements [

] whilst also diversifying the type of parking facilities provided (such as remote parking, although for the customer this translates to a “budget” service rather than a remote parking service).

## 11 **Recent merger activity**

No.

### **PART III: MARKET DEFINITION**

## 12 **Horizontal aggregation**

### 12.1 **Service market**

The relevant market for the purposes of this application is the market for travel to and from Christchurch International Airport.

Airport users decide how best to get to and from the airport given their personal circumstances and preferences. The answers to that decision are many. An airport user may choose to catch a taxi, shuttle or bus, rent a car, have someone drop them off or pick them up, walk, cycle, or drive and park for free in a nearby street or for a fee at a parking service provider. To state the obvious, airport parking, or any other mode of travel to and from CIAL, is not an end in itself.

The conclusions of the Commission in its Final Report on Wellington International Airport Limited Taxis/Shuttles are relevant in this respect. In that report, the Commission identified that significant competition exists between the various modes of transport from Wellington International Airport, including private vehicles.<sup>1</sup> That led the Commission to conclude that the relevant markets for its analysis were:

- A market for travel from WIAL
- A market for the provision of space for travel services from WIAL.

---

<sup>1</sup> Commerce Commission “*Final Report on WIAL Taxis/Shuttles*” (8 September 2010).

The same modes of transport identified in the report are available to users of Christchurch International Airport. All suppliers face the discipline of the demand-side substitutability that is available to airport users.

This market definition accords with the commercial realities that CIAL faces in the provision of its parking services.

The table below describes the various transport options to and from Christchurch International Airport and the range of price points available to consumers.

<b>Mode of transport</b>	<b>Approximate cost</b>
Taxi	\$40-70 each way from/to Christchurch CBD <sup>2</sup>
Shuttle bus	To Christchurch city, \$17-24 for the first passenger, \$5-10 for each additional passenger
Public bus	\$7.50 one way to/from Christchurch city, \$12 return
Rental vehicle	\$80-120 per day for average vehicle
Drive and free park	Cost of running vehicle
Drive and paid parking (per day averaged)	\$20-30 <sup>3</sup>
Free drop off and pick up	Cost of running vehicle
Other	Tour coach/private coach, walking or cycling

Notes on modes of transport:

- Drive and free park includes local roadside parking and parking at CIAL in a particular car park for less than 15 minutes (for which there is no charge). There is a reasonable supply of free, unrestricted roadside parking in the vicinity of the terminals (these are generally 900m – 1km distant).

<sup>2</sup> Although in this instance the approximate cost has been calculated with reference to travel to and from the Christchurch CBD, taxis of course provide transport to users of Christchurch International Airport in a much greater geographical area.

<sup>3</sup> This average figure is provided for illustrative purposes. Actual prices vary considerably depending on the parking service provided, supplier and duration of parking.

- Public buses – the “City Flyer” provides services to and from the CIAL on three routes via Sumner (No. 3), Fendalton (No. 29) and Cashmere (No. 10). A City Flyer leaves the airport for Christchurch city every 15-30 minutes depending on the time of day, with a journey time on either route of approximately 30 minutes.

#### 12.2 **Functional level**

Retail

#### 12.3 **Geographic area**

The market for travel to and from Christchurch International Airport is generally limited to Christchurch and proximate surrounding areas, although it is common for airport users to travel to and from the airport from all over the South Island.

#### 12.4 **Customer dimension**

While there is service differentiation in the market (as we discuss below), customer groups are not so distinct as to constitute a separate market.

### 13 **Service differentiation**

In the market for travel to and from Christchurch International Airport there is substantial service differentiation. The alternative modes of transport provide a wide selection of transport services, differentiated according to price and levels of convenience. For example, catching a taxi and the drive/paid parking option sit at the end of the spectrum where price and convenience is higher. Catching a bus sits at the other end of the spectrum where price and convenience are low. The substantial number of modes of transport to and from the airport means that there are well-developed price and quality points to serve all consumers in the market.

At the level of parking services within the market there is also significant differentiation. Consumers have the choice of parking at different price points and convenience levels, including parking close to the terminal, remote or budget parking, and purchasing value-added parking services.

### 14 **Vertical integration**

N/A

## **PART IV: COUNTERFACTUAL**

### 15 **The counterfactual scenario**

The counterfactual would likely include the following:

- Competition between all modes of transport to and from CIAL will continue in the counterfactual.
- [ ].



▪ [

].

## **PART V: COMPETITION ANALYSIS**

### **16 Existing competitors**

There are a number of different transport modes which compete against each other (inter-modal competition), and players within the modes which compete against each other (intra-modal competition). The following is a high level summary of the competitive modes and the players within those modes.

#### **16.1 Taxis**

Ten taxi companies offer transport to and from Christchurch International Airport. These companies have an agreement with CIAL that specifies minimum service standards that they and their drivers must adhere to whilst operating.

Individual taxi drivers obtain a licence from CIAL to operate from the airport. 479 individual taxi drivers currently have licences.

#### **16.2 Shuttles**

Two shuttle companies offer transport to and from Christchurch International Airport. These companies have an agreement with CIAL that specifies minimum service standards that they and their drivers must adhere to whilst operating. From February 2011 only one shuttle company will operate on-demand services from CIAL, as a result of a competitive process being undertaken at present.

Individual shuttle drivers obtain a licence from CIAL to operate from the airport. In 2010, more than 90 individual shuttle drivers had licences.

#### **16.3 Public bus**

The "City Flyer" provides services to and from the CIAL on three routes via Sumner (No. 3), Fendalton (No. 29) and Cashmere (No. 10). A City Flyer leaves the airport for Christchurch city every 15-30 minutes depending on the time of day, with a journey time on either route of approximately 30 minutes.

#### **16.4 Rental vehicle**

Thousands of rental vehicles are leased by Christchurch operators.

### 16.5 **Drive and park: Parking service providers**

Aside from Craddocks and CIAL there are at least 7 existing competitors supplying parking services i.e. not only value added services to users of Christchurch International Airport:

- Air New Zealand – Koru Valet operates an extensive valet parking service on-site at Christchurch International Airport. The service includes standard valet, grooming services, WOF and other services. CIAL understands this service is open to members and non-members of Koru.

[www.airnewzealand.co.nz/koru](http://www.airnewzealand.co.nz/koru)

- Waimack Auto Park – this operation runs a secure car storage facility with a strong focus on long term parking. Transport is offered to and from the airport. It also offers car wash and grooming services and mechanical servicing.

[www.waimack.co.nz](http://www.waimack.co.nz)

- Superior Airport Car Storage – Superior also operates a secure car storage facility with indoor and outdoor parking options. Transport is offered to and from the airport. Basic car wash and grooming services available.

[www.superior-airport-car-storage.co.nz](http://www.superior-airport-car-storage.co.nz)

- All Secure Self Storage

<http://www.allsecure.co.nz/index.htm>

- Sudima Hotel Christchurch Airport

[http://www.sudimachristchurch.co.nz/Sudima-Hotel-Christchurch/Park-and-Fly-Special\\_IDL=250\\_IDT=3433\\_ID=20130\\_.html](http://www.sudimachristchurch.co.nz/Sudima-Hotel-Christchurch/Park-and-Fly-Special_IDL=250_IDT=3433_ID=20130_.html)

- North & South Airport Car Storage

530 Sawyers Arms Road, Harewood, Christchurch

- Canterbury Car Storage

Pound Road, Yaldhurst

### 16.6 **Other options**

There are several other options for travelling to and from Christchurch International Airport which are not provided by competitors as such, but are options for travel that are in competition with the modes of transport. These include private vehicles using free parking, the free drop off/pick up option that is made available by CIAL, tour coach/private coach, and walking, cycling etc.

### 16.7 Overall objective

CIAL’s strategic objective is for users to have as many different transport options as possible, such that every user can easily purchase a price/quality/service package that suits. The long term health of CIAL rests in the user’s perception that CIAL is a quality, user-friendly hub. To this end, CIAL has facilitated the growth of several modes of transport and continues to encourage the development of innovative transport services to serve its customers.

### 17 Market share data

The following table shows the percentage of travellers to and from Christchurch International Airport by each transport mode. The figures provided are estimates only.

Transport mode	Percentage of travellers to and from Christchurch International Airport
Taxi	[ ]
Shuttle bus	[ ]
Rental vehicle	[ ]
Public bus	[ ]
Drive and free park	[ ]
Drive and paid park	[ ]
Free drop off and pick up	[ ]
Other	[ ]

The following table gives the market share percentage of providers in the “Drive and paid park” category. The figures provided are estimates only.

Competitor	Estimated % of transport market
CIAL	[ ]
Air New Zealand	[ ]
Craddocks	[ ]

Other	[    ]
-------	--------

**18 Constraint of competitors**

**18.1 Direct competitors**

Other modes of transport available to and from CIAL currently significantly constrain the ability of CIAL to increase price and/or reduce quality of its parking service and this will continue post-acquisition. CIAL is very conscious of this commercial reality and CIAL’s parking charges are set taking into account benchmarking of other modes of transport cost.

The substantial number of options for transport to and from Christchurch International Airport and the various levels of price and quality offered by other modes of transport have created an intensely competitive market for transport to and from the airport. If one of the transport options becomes unattractive due to a price increase (for example) a consumer will be able to switch to another transport option which offers similar pricing and quality of service.

In relation to car parking, Waimack Auto Park, Superior Airport Car Storage, North & South Airport Car Storage, Canterbury Car Storage, All Secure Self Storage and Sudima Hotel Christchurch Airport will presumably continue to provide a competitive offering (in particular remote or budget parking). These competitors operate on a model that requires little capital outlay and operational expenditure. An expansion of volume in response to price signals would require only the purchasing or lease of land or the redeployment of other landholdings or other access to land and other minimal set up costs. These competitors are also positioned to move up and down the value chain in response to consumer demands.

Air New Zealand will also presumably continue to compete for customers in the value-added parking services part of the market. [

].

Waimack Auto Park, Superior Airport Car Storage and North & South Airport Car Storage also currently offer a suite of value-added services which would continue to constrain the merged entity.

There are no significant barriers to customers switching easily between competitors across all modes of transport to and from Christchurch International Airport.

**18.2 Near competitors**

As discussed above, there are a wide variety of transport options to and from CIAL and a large number of suppliers. In relation to each mode of transport there will be

near competitors who could switch their focus and start supplying services to and from the airport.

[

].

Hotels and motels are similarly well placed with significant tracts of land and personnel to operate a remote parking operation. The entry of Sudima Hotel Christchurch Airport into the parking services segment is an example of this. CIAL notes that there are several hotels and motels in close proximity to the airport.

## 19 **New Entry**

### 19.1 ***Other modes of transport***

As CIAL does not supply other modes of transport, we are unable to accurately estimate the requirements for new entry into the market for transport to and from Christchurch International Airport. However, as a commercial matter we are very aware that barriers to entry are low. The result has been the proliferation of differing modes of transport to and from the airport.

### 19.2 ***Parking service providers***

The primary requirement for entry in the provision of parking services is having appropriate land within a reasonable distance of Christchurch International Airport (whether by acquiring, leasing or redeploying land). However, the land does not need to be particularly proximate to the terminals as there is consumer demand for remote parking as demonstrated by Craddocks and other service providers discussed above. The remote parking business model often relies on a form of transport to and from the parking area to the terminals. Customers build in an expectation of a short shuttle ride.

Capital outlay and operational costs are also minimal, requiring only staff, payment systems, security measures and transport to and from the airport terminals.

A new entrant would be able to supply parking services within a short time frame.

The provision of value-added parking services would require either an on-site or remote parking facility and additional facilities or personnel to provide the value-added services.

## 20 **Likelihood, extent and timeliness of entry (LET Test)**

### 20.1 ***Other modes of transport***

CIAL is unable to provide exact information on the likelihood, extent and timeliness of entry for other modes of transport. We do note, however, that this is a reasonably saturated part of the market with several different modes and many

players offering services within those modes. New entry is clearly happening and competition is vigorous.

**20.2 Parking services**

The provision of parking services for users of Christchurch International Airport is reasonably flexible in that there is no particular formula other than occupying land which is relatively proximate to the airport. As such, a number of businesses which already have significant tracts of land, or have the capability to acquire land (not necessarily as owner), are likely entrants into the market.

New entrants will have the ability to enter quickly, with relatively significant volume, and be cost and price competitive.

The potential for entry into the remote parking and value added segments is demonstrated by development at Auckland International Airport. In recent times, there have been a number of new entrants providing parking services to users of Auckland International Airport, mostly operating with a remote parking business model. [

].

**21 Countervailing power of buyers**

Buyers will have countervailing power in the sense of being able to exercise choice between a range of service providers in each transport mode, and between the different modes.

**22 Coordinated market power**

Co-ordination is highly unlikely in this market. There are a very large number of providers of transport options providing differentiated service offerings.

**23 Efficiencies**

CIAL expects short term efficiencies in combining CIAL's and Craddocks' assets, and longer term innovation and a platform for competition. Given the scale of the acquisition these efficiencies would be incremental rather than revolutionary.

**PART VI: FURTHER INFORMATION & SUPPORTING DOCUMENTATION**

**Contact details**

The contact details for selected providers in each of the transport service modes are below.

Provider	Contact details
<b>Taxis</b>	
Blue Star Taxis	Ph: 03 379 9820 PO Box 10-114 515 Moorhouse Avenue Phillipstown

	Christchurch
First Direct Taxis Limited	Ph: 03 377 2789 29 Walker Street PO Box 225 Christchurch
United Taxis 2000 Limited	Ph: 03 381 0810 106 Bowhill Road New Brighton Christchurch
Kiwi Cabs 2000 Limited	Ph: 027 640 3468 54 Rhona Street PO Box 14 178 Christchurch
Mainland Taxis Limited	Ph: 03 377 2772 17 Brookberry Crescent Po Box 261 Christchurch
Christchurch One Taxi Limited	Ph: 021 159 4725 133 Kotuku Crescent Christchurch
Gold Band Taxis Limited	Ph: 03 366 1001 193 Montreal Street PO Box 7282 Christchurch
Corporate Cabs Limited	Ph: 03 379 6162 Level 1, 242 St Asaph Street PO Box 4313 Christchurch
Regency Cabs CHCH 2003 Limited	Ph: 027 279 1659 4/93 Main South Road PO Box 14 003 Christchurch
Green Cabs Limited	Ph: 021 288 0024 Unit 12b 333-337 Harewood Road Christchurch
<b>Shuttle buses</b>	
Tourism Transport Limited	Ph: 03 357 9950 Ground Level, Eskimo House 31 Orchard Road Harewood Christchurch
Micro Investments Limited	Ph: 021 354 492 61 Truman Road Christchurch
<b>Rental vehicle</b>	
Avis Rent A Car Limited / Budget Rental	Ph: 03 358 9661 Christchurch Airport 76 Orchard Road Christchurch
Thrifty Car Rentals / Motoka Rentals Limited	Ph: 03 359 2720 PO Box 39 010 Christchurch
Tourism Holdings Limited	Ph: 03 358 9037 78 Orchard Road PO Box 14 099 Christchurch
Europcar New Zealand	Ph: 03 360 3433 Terminal Building Christchurch Airport PO Box 1225 Christchurch

Hertz Car Rental	Ph: 03 358 6789 801 Wairakei Road Christchurch Airport PO Box 4716 Christchurch
<b>Public bus</b>	
Red Bus Limited	Ph: 03 379 4260 120 Ferry Road Christchurch
<b>Parking service providers</b>	
Air New Zealand	Ph: 09 375 0285 Air New Zealand Koru Club Private Bag 93537 Takapuna North Shore City 0740 <a href="http://www.airnewzealand.co.nz/koru">www.airnewzealand.co.nz/koru</a>
Waimack Auto Park	Ph: 03 359 3552 109 Waimakariri Rd Harewood Christchurch 8051 <a href="http://www.waimack.co.nz">www.waimack.co.nz</a>
Superior Airport Car Storage	Ph: 021 359 208 99 Waimakariri Road Harewood Christchurch
All Secure Self Storage	Ph: 03 344 2244 94 Carmen Road Hornby Christchurch
Sudima Hotel Christchurch Airport	Ph: 03 358 3139 550 Memorial Avenue PO Box 14 043 Christchurch
North & South Airport Car Storage	Ph: 359 8777 North South Holiday Park 530 Sawyers Arm Road Harewood Christchurch
Car Canterbury Storage	Ph: 03 342 9373 Pound Road Yalhurst Christchurch

### **Annual reports and financial statement**

CIAL's most recent annual report is available at [www.christchurchairport.co.nz](http://www.christchurchairport.co.nz). We suggest the Commission contacts Craddocks directly to obtain relevant information regarding its business.

### **PART VII: CONFIDENTIALITY**

CIAL requests (in terms of section 9(2)(b)(ii) of the Official Information Act 1982) confidentiality in respect of the specific information set out in the attached schedule on the basis that the making available of the information would be likely to unreasonably prejudice the commercial position of CIAL.



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).

THIS NOTICE is given by:

Andy Lester  
General Manager, Operations and Infrastructure  
Christchurch International Airport Limited

I hereby confirm that:

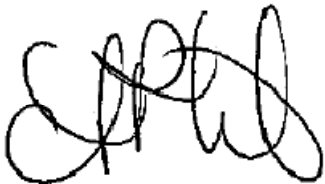
- all information specified by the Commission has been supplied;
- if information has not been supplied, reasons have been included as to why the information has not been supplied;
- all information known to the applicant(s) which is relevant to the consideration of this application/notice has been supplied;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

I undertake to advise the Commission immediately of any material change in circumstances relating to the application/notice.

---

Dated this 17th day of November 2010

Signed by Christchurch International Airport Limited



Andy Lester, General Manager, Operations and Infrastructure

I am an officer of the company and am duly authorised to make this application/notice.

---