

OPEN SUBMISSION:

Sun Media supports the interim decision of the Commerce Commission to decline the proposed merger.

It would be detrimental to Sun Media and many other small publishers throughout NZ, as the reduction in competition and increased power of the merged companies would result in even more price fixing than is attempted now.

This would be an assault on the many private New Zealand owned operations, purely for the benefit of two Australian-owned giants.

We agree with the commission's preliminary view that a merger would substantially lessen competition, particularly in community newspapers, markets for premium digital advertising and Sunday papers. There would be no incentive to curb subscription and retail prices for papers and the advent of paywalls would be inevitable for one, if not both of the major news websites.

A merger would be highly detrimental to the consumer and the advertiser. Any merger would weaken editorial objectivity and narrow the diversity of editorial scrutiny.

We applaud the Commission for genuinely and intelligently investigating the proposal and thank its personnel for their understanding and time to listen to all sides affected in this case.

CONFIDENTIALLY:

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Thanks for your time and consideration.

Brian & Claire Rogers, Sun Media Directors.

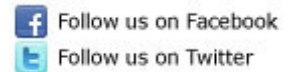
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