

From: Tex Edwards <texedwards@klr-international.com>
Sent: Thursday, 21 October 2021 3:10 PM
To: Keston Ruxton <Keston.Ruxton@comcom.govt.nz>
Cc: Antonia Horrocks <Antonia.Horrocks@comcom.govt.nz>
Subject: FW: Evidence geographic monopolization for Commissioner Dr John Stone

Dear Ms Ruxton

Please find attached a working drawing explaining in Evidence the concentration of Countdown stores in the Inner City of Auckland , and providing evidence to the Monopoly Watch Position, that geographic *(Sub Suburban) monopolies is the relevant market structure .

During the first day of hearings Mr Ratcliff of Countdown , provided evidence that he was sitting in his office (Location A) on the google map provided , in the background you could see (Note 2) the tower crane to a new supermarket which is contiguous with 8 other Countdown stores and only 1 New World Store and No Pak n Save Stores in the district of Auckland where the Countdown (Woolworths NZ head office is) . Noteworthy in today's discussion from Woolworths (Countdown) is the historic Ponsonby Fire Station, which was the backdrop to his presentation , this line of sight backdrop created 3 Countdowns within 3000m

The new Store (Note 2 location store in Jervois Rd Herne Bay) is a new build , - it's the Monopoly Watch NZ position that this is a blocking store preserving Count Down's dominance of this area and providing evidence that there is sub Suburban Monopolisation of districts. Talking in stealth to the Village real estate brokers involved with this store , it sounded like a premium was paid to ensure this site went to Countdown not Foodstuffs.

For Monopoly Watch , this conflicts with Mr Ratcliff's position that there is banner competition on Top Up Shops , we believe that top up shops are decided on convenience and its essentially 80% of consumers in this Auckland City area of " inner City West " were 80% likely to go to a count down , in any 2-5km circumference from their home .

For Monopoly Watch this "dominance of district " is amplified when we drive out of Auckland and we stop at Paeroa and Thames on the way to the Coromandel .

Paeroa = 1 Countdown
Thames 1 Pak n Save

We believe this " dominance of District concept " requires further analysis , as it's a fundamental to the foundation , of competition, as highlighted by MR Ernie Newman's submission .

Should the Commission require further " intra city Mapping " or nation wide chart plotting , we would be happy to provide the exact addresses of every major store

Thank you for considering the Monopoly Watch position

Regards
Tex Edwards
Analyst
Monopoly Watch NZ

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