

GODFREY HIRST

Issues for Consideration by the Commerce Commission

For the avoidance of doubt, Godfrey Hirst wishes all the issues set out in its submission of 27 April 2011 to be considered by the Commission.

These are conveniently referenced in the headings of that submission as follows:

- Acquisition substantially lessens competition
- Vertical integration means whole industry affected
- Detailed comments on competition analysis (as set out in Schedule 1)
- Insufficient public benefit to authorise
- Process issues – confidentiality means lack of transparency
 - vertical integration concerns have been ignored
 - balance of probabilities required of applicant (not mere assertion)
- The concerns with the Commission’s economic analysis as set out in Castalia’s report.