

Form G

Commonwealth of Australia
Competition and Consumer Act 2010 — subsection 93 (1)
NOTIFICATION OF EXCLUSIVE DEALING

To the Australian Competition and Consumer Commission:

Notice is hereby given, in accordance with subsection 93 (1) of the *Competition and Consumer Act 2010*, of particulars of conduct or of proposed conduct of a kind referred to subsections 47 (2), (3), (4), (5), (6), (7), (8) or (9) of that Act in which the person giving notice engages or proposes to engage.

PLEASE FOLLOW DIRECTIONS ON BACK OF THIS FORM

1. Applicant

(a) Name of person giving notice:

N98005 Finn Franchising Australia Pty Ltd ACN 139 242 676 trading as “Finn Franchise Brokers” (hereafter referred to as “FFB”).

(b) Short description of business carried on by that person:

FFB is engaged in the business of establishing, developing and granting rights to operate “Finn Franchise Brokers” franchises. In respect of that business, FFB has developed business procedures and systems together with a distinctive and valuable name, image and reputation. FFB enters into franchise agreements with franchisees.

(c) Address in Australia for service of documents on that person:

Unit 2/14 Wellington Street, Acacia Ridge, Queensland 4110

2. Notified arrangement

(a) Description of the goods or services in relation to the supply or acquisition of which this notice relates:

Pursuant to the franchise agreements between FFB and its franchisees, the franchisees are required to exclusively use certain systems and resources. These systems and resources are an integral part of FFB’s franchising system and crucial to the success of both FFB and its franchisees. This notice relates to five distinct systems and resources:

(i) **BOX cloud storage**

Franchisees are required to use BOX. BOX is a centralised cloud-based facility where FFB stores its operations manual and training materials. All franchisees have access to BOX via their own login and password. Using BOX has several important benefits for FFB and its franchisees. It: (A)

allows FFB to provide all documents and materials to franchisees in a secure environment; (B) prevents information being lost; (C) protects the intellectual property which is essential to the success of FFB and its franchisees; and (D) creates a central environment where franchisees can securely share documents and information to help them better collaborate. The cost for franchisees to subscribe to BOX is on a par with similar offerings from competitor providers.

(ii) XERO cloud-based bookkeeping software

Franchisees are required to use XERO. XERO is cloud-based bookkeeping software where franchisees maintain their financial records. Using XERO has several important benefits for FFB and franchisees. It: (A) ensures franchisees keep appropriate records that are in compliance with their regulatory and contractual obligations; (B) assists them in lodging accurate and timely tax filings; and (C) enables FFB as franchisor to provide financial benchmarking reports so the franchisees can continually monitor and improve their performance and profitability using FFB's market knowledge. The cost for franchisees to subscribe to XERO is on a par with similar offerings from competitor providers.

(iii) Business marketing websites

Franchisees are required to pay for and use certain business marketing websites. On behalf of the franchisees, FFB takes out a head subscription to various websites that act like online classifieds of businesses for sale. Some are general websites that list all sorts of businesses (eg: www.seekcommercial.com.au) while others are specific niche websites (eg: www.bakeriesforsale.com.au). Use of these websites is essential, as more than 80% of total new customer enquiries come via these websites. FFB is uniquely positioned by its expertise and industry oversight to monitor and decide which of these websites are most important to the businesses of the franchisees. By subscribing as a group to these various websites, there is a significant cost-saving for franchisees as otherwise they would need to subscribe on an individual basis to receive the same level of new client enquiries. Franchisees are provided with a transparent document each month that shows each website subscribed to, the actual cost of each subscription, and the equal division of those total costs between them. FFB facilitates these subscriptions at no direct cost and does not make a profit on the subscriptions.

(iv) FORS customer relationship management software

Franchisees are required to use the FORS customer relationship management software. FORS is proprietary software developed and customised by FFB specifically for use by franchisees. FORS keeps appropriate records on customers and also ensures statutory compliance by FFB and the franchisees with the various Real Estate Acts which apply to its business and which prescribe detailed licensing requirements. The FORS system is therefore an essential part of the business. Because it is customised, there is no directly equivalent alternative software available for purchase.

(v) Finn Selling System

Franchisees are required to follow the Finn Selling System. The System is a method of selling to clients that is tailored to the industry. The System comprises several steps and processes in a specific format, and is backed by an online “Manual of Documents” and training videos. Franchisees use the system to efficiently manage clients towards successful sales achieved in a legally compliant manner. Usage of the system is essential to the success of franchisees. Because it is customised, there is no directly equivalent alternative system available for purchase.

(b) Description of the conduct or proposed conduct:

Pursuant to the franchise agreements between FFB and its franchisees, the franchisees are required to exclusively use the systems and resources listed in this notification. These systems and resources are an integral part of FFB’s franchising system and crucial to the success of both FFB and its franchisees. See section 2(a) for specific information on each system or resource and the rationale for why their exclusive use benefits franchisees and the public.

3. Persons, or classes of persons, affected or likely to be affected by the notified conduct

(a) Class or classes of persons to which the conduct relates:

Franchisees of FFB.

(b) Number of those persons:

(i) At present time:

16

- (ii) Estimated within the next year:

16

- (c) Where number of persons stated in item 3 (b) (i) is less than 50, their names and addresses:

See Annex A.

4. Public benefit claims

- (a) Arguments in support of notification:

The conduct described in this notification has several broad public benefits, including:

- (i) Consistency and information-sharing across the FFB franchise system, which: (A) improves the quality of service offered to the public; (B) makes for more efficient operation and management of the FFB franchise system because franchisees are relying on the same information and resources; (C) increases the prospect of franchisees brokering successful sales, which is for the benefit of buyers, sellers, the customers of the underlying business and the general public; and (D) increases the value of the franchisees' own businesses.
- (ii) More efficient implementation of FFB's business systems, which are proven systems carefully designed to ensure compliance with onerous legal obligations and which leverage FFB's substantive industry experience.
- (iii) More efficient and effective bargaining between the group of franchisees and its suppliers (especially in respect of the "business marketing websites" described in section 2 above), which reduces overall costs for the franchisees.
- (iv) Cost and time savings for franchisees as the resources are designed to be franchisee-friendly and franchisees do not need to source and negotiate these resources for themselves.
- (v) Improved training, support and connectivity for franchisees, as FFB can directly assist franchisees in their use of these systems and resources. Such support would not be available were franchisees to source and negotiate their own arrangements.

Section 2 above contains specific rationales and benefits in respect of each system and resource relevant to this notification.

- (b) Facts and evidence relied upon in support of these claims:

FFB has significant industry expertise and has nominated the systems and resources listed in this notification after due consideration of alternatives and believing these systems and resources will maximise the prospects of success for it and its franchisees. FFB's deep industry expertise and the rationales set out in section 2 and 4(a) of this notification are intended to serve as evidence of the benefits described above.

5. **Market definition**

Provide a description of the market(s) in which the goods or services described at 2 (a) are supplied or acquired and other affected markets including: significant suppliers and acquirers; substitutes available for the relevant goods or services; any restriction on the supply or acquisition of the relevant goods or services (for example geographic or legal restrictions):

(i) **BOX cloud storage**

Market: Commercial cloud-storage available in Australia.

Substitutes: There are several competing cloud-storage products available.

Rationale: The quality and cost of BOX is on par with similar offerings from competitor providers. FFB has nominated BOX as it is essential for franchisees to use a single system integrated with FFB and other franchisees.

(ii) **XERO cloud-based bookkeeping software**

Market: Commercial cloud-based bookkeeping software in Australia.

Substitutes: There are several competing cloud-based bookkeeping software products available.

Rationale: The quality and cost of XERO is on par with similar offerings from competitor products. FFB has nominated XERO as it is essential for franchisees to use a single system integrated with FFB and other franchisees.

(iii) **Business marketing websites**

Market: Business marketing websites in Australia.

Substitutes: FFB subscribes to a large number of business marketing websites. FFB regularly monitors and reassesses which business marketing websites it should subscribe to on behalf of its franchisees.

Rationale: The business marketing websites to which FFB subscribes is a minimum which FFB, given its expertise, considers appropriate for the

success of its business system. Franchisees are free to subscribe to additional business marketing websites.

(iv) FORS customer relationship management software

Market: FORS is proprietary software developed and customised by FFB specifically for use by franchisees. For this reason, it is difficult to determine the scope of its market.

Substitutes: Because it is developed and customised for its specific purpose, there is no direct substitute for FORS. Any off-the-shelf alternative would not include the functionality built into FORS.

(v) Finn Selling System

Market: The Finn Selling System is a proprietary system developed by FFB specifically for use by franchisees. For this reason, it is difficult to determine the scope of its market.

Substitutes: Because it is developed and customised for its specific purpose, there is no direct substitute for the Finn Selling System.

6. Public detriments

- (a) Detriments to the public resulting or likely to result from the notification, in particular the likely effect of the notified conduct on the prices of the goods or services described at 2 (a) above and the prices of goods or services in other affected markets:

(Refer to direction 9)

Any detriment to the public resulting from the conduct described in this notification is likely to be minor. By requiring franchisees to use certain systems and resources when substitutes exist, FFB may be reducing competition in those markets. However, those markets are incredibly large and the impact of FFB's conduct is very small. FFB's conduct is extremely unlikely to affect prices or the quality or availability of other services. FFB's conduct does prevent franchisees negotiating their own terms of service, but any minor detriment is outweighed by the benefits associated with consistency throughout the FFB franchise system.

- (b) Facts and evidence relevant to these detriments:

Nil.


7. Further information

- (a) Name, postal address and contact telephone details of the person authorised to provide additional information in relation to this notification:

Stephen Daniel Finn
Office 2/ 14 Wellington Street
Acacia Ridge
Brisbane, Queensland
AUSTRALIA 4110
PH: 61 7 3333 2434

Dated.....27/11/14.....

Signed by/on behalf of the applicant


.....
(Signature)

Stephen Daniel Finn

(Full Name)

Finn Franchising Australia Pty Ltd ACN 139 242 676

(Organisation)

Director

(Position in Organisation)

Annex A

to Form G in respect of
Finn Franchising Australia Pty Ltd ACN 139 242 676
trading as “Finn Franchise Brokers” (“FFB”)

List of franchisees of FFB

NAME	OFFICE ADDRESS
Ryan Willsher	Level 2, 9/49 Cedric St, STIRLING, WA, 6021
Rajiv Rajan	Suite 24, Como Corporate Centre, 11 Preston St COMO 6152
Reece O'Sullivan	45 Williton Rd, KARRINYUP WA 6018
James Grigg	23/12-14 Adelphi Tce, GLENELG NORTH, SA 5045
Rod Justin	PO Box 293, BELMONT, VIC 3216
Bernie Carroll	2/24 Mason Street, WARRAGUL, VIC 3820
Graeme Wooster	PO Box 558, FRENCHS FOREST, NSW 1640
Mick Craig	2/14 Wellington St, ACACIA RIDGE, QLD 4110
Russ Webb	PO Box 56, BUDERIM, QLD 4556
Bob Dean	6/28 Greg Chappell Drive, BURLEIGH HEADS, QLD 4220
Dione Mauric	Elouera Tower, 81 Sixth Avenue, MAROOCHYDORE, QLD 4558
James Taylor	PO Box 893, WARNERS BAY, NSW, 2282
Warren Muller	52 Dickson Ave, WEST RYDE NSW 2114
Andrew Wilcox	PO Box 1307, PENRITH NSW 2751
Andrew Hahn	1st Fl, Office 5, The Cavanagh Centre, 43 Cavanagh St, DARWIN NT 0800
Bob Boswell	Suite 2, 320 Kingsway, CARINGBAH, NSW 2229

DIRECTIONS

1. In lodging this form, applicants must include all information, including supporting evidence that they wish the Commission to take into account in assessing their notification.

Where there is insufficient space on this form to furnish the required information, the information is to be shown on separate sheets, numbered consecutively and signed by or on behalf of the applicant.

2. If the notice is given by or on behalf of a corporation, the name of the corporation is to be inserted in item 1 (a), not the name of the person signing the notice, and the notice is to be signed by a person authorised by the corporation to do so.
3. Describe that part of the business of the person giving the notice in the course of the which the conduct is engaged in.
4. If particulars of a condition or of a reason of the type referred to in section 47 of the *Competition and Consumer Act 2010* have been reduced in whole or in part to writing, a copy of the writing is to be provided with the notice.
5. Describe the business or consumers likely to be affected by the conduct.
6. State an estimate of the highest number of persons with whom the entity giving the notice is likely to deal in the course of engaging in the conduct at any time during the next year.
7. Provide details of those public benefits claimed to result or to be likely to result from the proposed conduct including quantification of those benefits where possible.
8. Provide details of the market(s) likely to be affected by the notified conduct, in particular having regard to goods or services that may be substitutes for the good or service that is the subject matter of the notification.
9. Provide details of the detriments to the public which may result from the proposed conduct including quantification of those detriments where possible.

Form G

Commonwealth of Australia
Competition and Consumer Act 2010 — subsection 93 (1)
NOTIFICATION OF EXCLUSIVE DEALING

To the Australian Competition and Consumer Commission:

Notice is hereby given, in accordance with subsection 93 (1) of the *Competition and Consumer Act 2010*, of particulars of conduct or of proposed conduct of a kind referred to subsections 47 (2), (3), (4), (5), (6), (7), (8) or (9) of that Act in which the person giving notice engages or proposes to engage.

PLEASE FOLLOW DIRECTIONS ON BACK OF THIS FORM

1. Applicant

(a) Name of person giving notice:

N98006 Finn Business Sales Pty Ltd ACN 163 374 507 (hereafter referred to as “FBS”).

(b) Short description of business carried on by that person:

FBS is engaged in the business of establishing, developing and granting rights to operate “Finn Business Sales” franchises to provide business broker services. In respect of that business, FBS has developed business procedures and systems together with a distinctive and valuable name, image and reputation. FBS enters into franchise agreements with franchisees.

(c) Address in Australia for service of documents on that person:

Unit 2/14 Wellington Street, Acacia Ridge, Queensland 4110

2. Notified arrangement

(a) Description of the goods or services in relation to the supply or acquisition of which this notice relates:

Pursuant to the franchise agreements between FBS and its franchisees, the franchisees are required to exclusively use certain systems and resources. These systems and resources are an integral part of FBS’s franchising system and crucial to the success of both FBS and its franchisees. This notice relates to five distinct systems and resources:

(i) **BOX cloud storage**

Franchisees are required to use BOX. BOX is a centralised cloud-based facility where FBS stores its operations manual and training materials. All franchisees have access to BOX via their own login and password. Using

BOX has several important benefits for FBS and its franchisees. It: (A) allows FBS to provide all documents and materials to franchisees in a secure environment; (B) prevents information being lost; (C) protects the intellectual property which is essential to the success of FBS and its franchisees; and (D) creates a central environment where franchisees can securely share documents and information to help them better collaborate. The cost for franchisees to subscribe to BOX is on a par with similar offerings from competitor providers.

(ii) XERO cloud-based bookkeeping software

Franchisees are required to use XERO. XERO is cloud-based bookkeeping software where franchisees maintain their financial records. Using XERO has several important benefits for FBS and franchisees. It: (A) ensures franchisees keep appropriate records that are in compliance with their regulatory and contractual obligations; (B) assists them in lodging accurate and timely tax filings; and (C) enables FBS as franchisor to provide financial benchmarking reports so the franchisees can continually monitor and improve their performance and profitability using FBS's market knowledge. The cost for franchisees to subscribe to XERO is on a par with similar offerings from competitor providers.

(iii) Business marketing websites

Franchisees are required to pay for and use certain business marketing websites. On behalf of the franchisees, FBS takes out a head subscription to various websites that act like online classifieds of businesses for sale. Some are general websites that list all sorts of businesses (eg: www.seekcommercial.com.au) while others are specific niche websites (eg: www.bakeriesforsale.com.au). Use of these websites is essential, as more than 80% of total new customer enquiries come via these websites. FBS is uniquely positioned by its expertise and industry oversight to monitor and decide which of these websites are most important to the businesses of the franchisees. By subscribing as a group to these various websites, there is a significant cost-saving for franchisees as otherwise they would need to subscribe on an individual basis to receive the same level of new client enquiries. Franchisees are provided with a transparent document each month that shows each website subscribed to, the actual cost of each subscription, and the equal division of those total costs between them. FBS facilitates these subscriptions at no direct cost and does not make a profit on the subscriptions.

(iv) FORS customer relationship management software

Franchisees are required to use the FORS customer relationship management software. FORS is proprietary software developed and customised by FBS specifically for use by franchisees. FORS keeps appropriate records on customers and also ensures statutory compliance by FBS and the franchisees with the various Real Estate Acts which apply to its business and which prescribe detailed licensing requirements. The FORS system is therefore an essential part of the business. Because it is customised, there is no directly equivalent alternative software available for purchase.

(v) Finn Selling System

Franchisees are required to follow the Finn Selling System. The System is a method of selling to clients that is tailored to the industry. The System comprises several steps and processes in a specific format, and is backed by an online “Manual of Documents” and training videos. Franchisees use the system to efficiently manage clients towards successful sales achieved in a legally compliant manner. Usage of the system is essential to the success of franchisees. Because it is customised, there is no directly equivalent alternative system available for purchase.

(b) Description of the conduct or proposed conduct:

Pursuant to the franchise agreements between FBS and its franchisees, the franchisees are required to exclusively use the systems and resources listed in this notification. These systems and resources are an integral part of FBS’s franchising system and crucial to the success of both FBS and its franchisees. See section 2(a) for specific information on each system or resource and the rationale for why their exclusive use benefits franchisees and the public.

3. Persons, or classes of persons, affected or likely to be affected by the notified conduct

(a) Class or classes of persons to which the conduct relates:

Franchisees of FBS.

(b) Number of those persons:

(i) At present time:

10

- (ii) Estimated within the next year:

10

- (c) Where number of persons stated in item 3 (b) (i) is less than 50, their names and addresses:

See Annex A.

4. Public benefit claims

- (a) Arguments in support of notification:

The conduct described in this notification has several broad public benefits, including:

- (i) Consistency and information-sharing across the FBS franchise system, which: (A) improves the quality of service offered to the public; (B) makes for more efficient operation and management of the FBS franchise system because franchisees are relying on the same information and resources; (C) increases the prospect of franchisees brokering successful sales, which is for the benefit of buyers, sellers, the customers of the underlying business and the general public; and (D) increases the value of the franchisees' own businesses.
- (ii) More efficient implementation of FBS's business systems, which are proven systems carefully designed to ensure compliance with onerous legal obligations and which leverage FBS's substantive industry experience.
- (iii) More efficient and effective bargaining between the group of franchisees and its suppliers (especially in respect of the "business marketing websites" described in section 2 above), which reduces overall costs for the franchisees.
- (iv) Cost and time savings for franchisees as the resources are designed to be franchisee-friendly and franchisees do not need to source and negotiate these resources for themselves.
- (v) Improved training, support and connectivity for franchisees, as FBS can directly assist franchisees in their use of these systems and resources. Such support would not be available were franchisees to source and negotiate their own arrangements.

Section 2 above contains specific rationales and benefits in respect of each system and resource relevant to this notification.

- (b) Facts and evidence relied upon in support of these claims:

FBS has significant industry expertise and has nominated the systems and resources listed in this notification after due consideration of alternatives and believing these systems and resources will maximise the prospects of success for it and its franchisees. FBS's deep industry expertise and the rationales set out in section 2 and 4(a) of this notification are intended to serve as evidence of the benefits described above.

5. **Market definition**

Provide a description of the market(s) in which the goods or services described at 2 (a) are supplied or acquired and other affected markets including: significant suppliers and acquirers; substitutes available for the relevant goods or services; any restriction on the supply or acquisition of the relevant goods or services (for example geographic or legal restrictions):

(i) BOX cloud storage

Market: Commercial cloud-storage available in Australia.

Substitutes: There are several competing cloud-storage products available.

Rationale: The quality and cost of BOX is on par with similar offerings from competitor providers. FBS has nominated BOX as it is essential for franchisees to use a single system integrated with FBS and other franchisees.

(ii) XERO cloud-based bookkeeping software

Market: Commercial cloud-based bookkeeping software in Australia.

Substitutes: There are several competing cloud-based bookkeeping software products available.

Rationale: The quality and cost of XERO is on par with similar offerings from competitor products. FBS has nominated XERO as it is essential for franchisees to use a single system integrated with FBS and other franchisees.

(iii) Business marketing websites

Market: Business marketing websites in Australia.

Substitutes: FBS subscribes to a large number of business marketing websites. FBS regularly monitors and reassesses which business marketing websites it should subscribe to on behalf of its franchisees.

Rationale: The business marketing websites to which FBS subscribes is a minimum which FBS, given its expertise, considers appropriate for the

success of its business system. Franchisees are free to subscribe to additional business marketing websites.

(iv) FORS customer relationship management software

Market: FORS is proprietary software developed and customised by FBS specifically for use by franchisees. For this reason, it is difficult to determine the scope of its market.

Substitutes: Because it is developed and customised for its specific purpose, there is no direct substitute for FORS. Any off-the-shelf alternative would not include the functionality built into FORS.

(v) Finn Selling System

Market: The Finn Selling System is a proprietary system developed by FBS specifically for use by franchisees. For this reason, it is difficult to determine the scope of its market.

Substitutes: Because it is developed and customised for its specific purpose, there is no direct substitute for the Finn Selling System.

6. Public detriments

- (a) Detriments to the public resulting or likely to result from the notification, in particular the likely effect of the notified conduct on the prices of the goods or services described at 2 (a) above and the prices of goods or services in other affected markets:

(Refer to direction 9)

Any detriment to the public resulting from the conduct described in this notification is likely to be minor. By requiring franchisees to use certain systems and resources when substitutes exist, FBS may be reducing competition in those markets. However, those markets are incredibly large and the impact of FBS's conduct is very small. FBS's conduct is extremely unlikely to affect prices or the quality or availability of other services. FBS's conduct does prevent franchisees negotiating their own terms of service, but any minor detriment is outweighed by the benefits associated with consistency throughout the FBS franchise system.

- (b) Facts and evidence relevant to these detriments:

Nil.

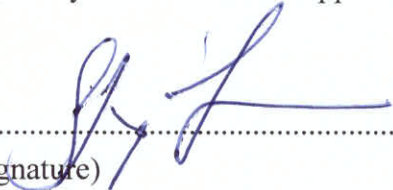
7. Further information

- (a) Name, postal address and contact telephone details of the person authorised to provide additional information in relation to this notification:

Stephen Daniel Finn
Office 2/ 14 Wellington Street
Acacia Ridge
Brisbane, Queensland
AUSTRALIA 4110
PH: 61 7 3333 2434

Dated.....27/11/14.....

Signed by/on behalf of the applicant

.....
(Signature) 

Stephen Daniel Finn
(Full Name)

Finn Franchising Australia Pty Ltd ACN 139 242 676
(Organisation)

Director
(Position in Organisation)

Annex A

**to Form G in respect of
Finn Business Sales Pty Ltd ACN 163 374 507
("FBS")**

List of franchisees of FBS

NAME	OFFICE ADDRESS
Matthew Noller	PO Box 11460, CENTENARY HEIGHTS, QLD 4350
Bob & Kate Dean	PO Box 1409, PARADISE POINT, QLD 4216
Phil Heery	22 Ontario Crescent, NARANGBA, QLD 4055
Andrew Morris	113 Hawken Drive, ST LUCIA QLD 4067
Wayne & Karina Perry	PO Box 534, YEPPOON, QLD 4703
Peter Zurzolo	74 Newry St, FLOREAT, WA, 6017
Paul Adamson	PO Box 1340, CANNING BRIDGE APPLECROSS, WA 6153
Andrew Hahn	1st Fl, Office 5, The Cavanagh Centre, 43 Cavanagh ST, DARWIN NT 0800
Stuart Brien	16 Doodts Rd, BALLARAT NORTH, VIC 3350
Shweta & Manish Tripathi	PO BOX 572, MODBURY, SA 5092

DIRECTIONS

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3. Describe that part of the business of the person giving the notice in the course of the which the conduct is engaged in.
4. If particulars of a condition or of a reason of the type referred to in section 47 of the *Competition and Consumer Act 2010* have been reduced in whole or in part to writing, a copy of the writing is to be provided with the notice.
5. Describe the business or consumers likely to be affected by the conduct.
6. State an estimate of the highest number of persons with whom the entity giving the notice is likely to deal in the course of engaging in the conduct at any time during the next year.
7. Provide details of those public benefits claimed to result or to be likely to result from the proposed conduct including quantification of those benefits where possible.
8. Provide details of the market(s) likely to be affected by the notified conduct, in particular having regard to goods or services that may be substitutes for the good or service that is the subject matter of the notification.
9. Provide details of the detriments to the public which may result from the proposed conduct including quantification of those detriments where possible.