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To: Adjudication
Subject: "N 10000505 CTIAQ - submission"

Categories: [REDACTED]

Following the ACCC's invitation to make a submission we would like to comment as follows on whether CTIAQ's Proposed Conduct:

1. has the purpose, effect or likely effect of substantially lessening competition

As far as exhibitors providing products and services in the RV industry are concerned, the answer here has to be "No". Essentially it boils down to the judgment of each individual business on how many events, and in which regional area, it needs to attend per annum to reach its target. No business is forced to limit this to the CTIAQ owned and operated events. The proposed conduct just offers a reward for CTIAQ members if they choose to do so. More broadly, the vast number of events in the industry currently on offer means that most companies can't attend all of them. As a result the visiting public will only see a limited number of available products if they go to a particular show. Hence a smaller number of events with each of them offering a higher percentage of all available products in the market would be beneficial to both, the potential buyers and also the exhibitors. The benefit for the latter would result from exposure to more potential customers on fewer events.

As far as the event organisers are concerned there might be some effect on the competition if the majority of CTIAQ members would take advantage of the proposed loyalty program. However it is questionable whether it would result in substantially lesser events, given the fact that many of these events organised outside CTIAQ are not purely RV related but a combination of home and sporting shows targeting a different audience.

2. will or will not result in likely public benefit(s) which would outweigh any public detriment(s)

Benefits for the consumer are obvious if he can rely upon being offered only compliant products at an event. This will likely outweigh the inconvenience of possibly not to find all products he might be interested in on a particular event not organised by CTIAQ. After all, the consumer can choose which event to visit.

Whether the proposed conduct is beneficial to the exhibitor will depend on the nature of his business. I. e. whether he can generate enough business with fewer CTIAQ organised events and cover a large enough area to address his target market. For some the benefit of a discount might work well, others might miss out because they have to attend a few more shows to cover a larger area.

Lastly, for event organisers outside CTIAQ the proposed conduct will likely not be beneficial. However they might be able to compensate possibly declining numbers of RV exhibitors with additional exhibitors from other areas.

Kind regards,



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