

17 January 2020

Steven Lee  
Adjudication Branch  
Australian Competition and Consumer Commission  
GPO Box 3131  
Canberra ACT 2601

By Email: adjudication@accc.gov.au

Dear Mr Lee

**N1000509 – TVSN Channel Pty Ltd – submission**

We act for Australian Shopping Network Pty Ltd which has operated the “Openshop” television shopping network in Australia since 1 August 2019.

Our client opposes the exclusive dealing notification lodged by TVSN Channel Pty Ltd (TVSN) under cover of a letter from its solicitors, Moulis Legal, dated 30 October 2019 (**the Notification**).

For reasons which are set out in more detail below:

1. The ACCC should not accept the submission made by TVSN in paragraph 9.4 of the Notification that the exclusive dealing in which TVSN wishes to be permitted to engage will not infringe section 47 of the *Competition and Consumer Act 2010 (Cth)* (**the Act**). If that submission was correct, then there would be no need for the Notification to have been made;
2. If TVSN is permitted to engage in the notified exclusive dealing conduct, the consequence of that permission will be a substantial lessening of competition in the market for the sale and promotion of goods by means of a television shopping network format;
3. Prior to the entry into the market of our client, TVSN held a monopoly position in the market for the sale and promotion of goods by means of a television shopping network format. Regardless of whether or not the Notification is specifically intended to entrench TVSN's power in that market, it is likely to have that effect;
4. The “public benefit” on which TVSN relies in its submission in support of its notification is does not withstand scrutiny for a number of reasons, most notably because the matters on which TVSN relies are principally matters which are of benefit to TVSN, not to the benefit the public;
5. Further, many of the “purposes” on which TVSN relies as supporting its Notification can be secured without the need to engage in exclusive dealing (and without the consequence of the detrimental impact on competition which exclusive dealing creates). For example, the purpose of “preventing TVSN suppliers from misusing TVSN's proprietary TV shopping selection information sales metrics data” (see paragraph 9.4(a)(3) of the Notification) can, to the extent that such information is confidential, be protected by contractual provisions between TVSN and its suppliers; and
6. Even if any public benefit at all can be discerned from the Notification, the benefit does not outweigh the detriment which is likely to result if TVSN is permitted to engage in the



exclusive dealing which is subject of the Notification. The likely effect of the conduct is to substantially diminish competition in relation to the sale of consumer goods via the "television shopping network" format.

7. In particular, in the short time in which our client has been operating as the only competitor to TVSN, a number of examples which are described in more detail below (including the "Legmaster", Samsung, Trophy Skin, Django & Juliette, and Diana Ferrari) demonstrates that where a supplier of goods has the opportunity to market those goods via different television shopping network market participants, the consequence of that opportunity is competition in relation to the price, and terms of sale, of those goods (leading to a more effective market and ultimately, better prices for consumers). The opportunity for that competition between television shopping networks would be destroyed if TVSN was permitted to engage suppliers on an exclusive basis as set out in the Notification.

Accordingly, our client submits that the ACCC should revoke TVSN's Notification by giving TVSN a notice pursuant to section 93(3) of the Act.

### **The nature of the relevant market**

The Notification appears to proceed on the basis that the relevant market is "the retail market for consumer goods in Australia" - see paragraphs 6 and 8 of the Notification. Our client submits that to describe the relevant market which will be affected by the exclusive dealing in this way is not correct. The "retail market for consumer goods" is large, and there are vast swathes of that market which will be entirely unaffected by the exclusive dealing in which TVSN wishes to engage. Accordingly, it is not correct to assess the Notification by reference to the entire "retail market for consumer goods".

Rather, our client submits that the relevant market is, in fact, the market for the "promotion and sale of products on television shopping channels or direct selling mediums involving video footage or livestreaming in the presentation and promotion of goods and which utilise the presentation and/or demonstration of goods is an integral part of the marketing and sales process" - namely, the very definition which TVSN uses in the Notification to define the expression "Competitor Shopping Channels". That is, the best guide to the relevant market is not what TVSN identifies as being the market, but what TVSN identifies as the sphere of activity in which it wishes to engage in exclusive dealing.

We note that on 10 January 2020, Moulis Legal sent a further letter (the **10 January Letter**) to the ACCC in order to "clarify what is intended by the term Competitor Shopping Channels" referred to in the Notification. The level of detail and the specific features of "Competitor Shopping Channels" which are described in the 10 January Letter only serve to emphasise that the market in which TVSN seeks to be permitted to engage in exclusive dealing is not the "retail market for consumer goods", but a very distinct and specific subset of that market; namely the market for sale of products on television shopping channels.

TVSN has a very substantial degree of power in the market for the promotion and sale of products on television shopping channels - indeed, until our client commenced operations on about 1 August 2019, TVSN had an effective monopoly on that market. Our client's entry into that market has disrupted TVSN's monopoly and brought competition to the market, and whether or not the Notification is calculated to re-entrench TVSN's monopoly position, our client submits that it is likely to have that effect.

Because our client is a new business, our client is not presently able to estimate the respective shares of the market for the promotion and sale of products by television shopping network which are held by our client and by TVSN. However, despite the fact that there is now competition in this market as a result of our client's commencement of operation, TVSN still has a substantial degree of power in the market, particularly given circumstances in which:

1. TVSN and/or its predecessors have been broadcasting in Australia since about 1995, whereas our client commenced operation only on 1 August 2019; and
2. TVSN is able to reach virtually every household in Australia via Foxtel Channel 176, Freeview Channel 14 (Metro) and Freeview Channels 57, 75 & 84 (in regional areas – Channel 75 is used by TVSN in Darwin), whereas our client's current broadcasting on Freeview Channel 75 (Metro and Regional Queensland) limits our client to Australia's five mainland State capital cities and certain regional Queensland markets.

Paragraph 6 of the Notification sets out the categories of consumer goods which TVSN sells in Australia. Although our client's business is at an early stage of development (so that our client does not currently sell goods in every one of the categories listed by TVSN) our client expects that there will be very little difference between the categories of goods which TVSN has listed and the categories of goods which our client will wish to sell. This is because there are particular consumer goods which are inherently suitable for sale and promotion by the television shopping network format (and, equally, consumer goods which are unsuitable for sale by this format).

It is plainly in the interest of suppliers of goods that they should have the opportunity to sell their goods through as many channels as possible (and through as many different participants in each channel as possible). That is of particular relevance in relation to television shopping network channels, because the channel is available to suppliers of relatively modest size. For example, many suppliers which do not have access to a sufficient quantity of goods to be able to obtain shelf space in a major supermarket will be able to use television shopping network channels to sell their goods. One such supplier with whom our client works is Rohr Remedy, which makes a range of natural skin care products, created from Australian bush medicines. As is clear from Rohr Remedy's list of stockists:

<https://www.rohrremedy.com/pages/stockists>

Rohr Remedy products are not carried by any "bricks and mortar" supplier which has the national reach which our client is able to provide.

Accordingly, the fact that TVSN has significant power in the television shopping network format in Australia means that if TVSN is permitted to deal with suppliers on the basis that those suppliers then cannot deal with our client (or other competitors in the market), the likely consequence is that those suppliers will accept exclusivity as a condition of being able to sell goods to TVSN. Although our client is not in a position to identify specific suppliers who have advised our client that they would deal with TVSN to the exclusion of our client if TVSN require them to do so, our client is aware of suppliers who have expressed this view.

The consequence of this will not only be the immediate lessening of competition in the existing television shopping network market, but also the likelihood that the development of a mature and competitive television shopping network market will be thwarted entirely.

### **Competition in a mature market for the promotion and sale of products on television and shopping channels**

Although our client has been operating in Australia only since about 1 August 2019, our client is a subsidiary of South Korea's leading home shopping channel operator, Hyundai Home Shopping Network Corp (**HHSN**). HHSN is listed on the Korean Stock Exchange and has a market capitalisation in excess of \$A1 billion.

The television home shopping network market in South Korea is extensive, competitive and mature. A guide to “E-commerce in Korea” produced by Austrade in 2017<sup>1</sup> identified the following shopping channels amongst the “Major Online Shopping Websites” in Korea:

1. CJ O Shopping;
2. GS Homeshopping;
3. Home & Shopping;
4. IM Shopping;
5. Lotte Homeshopping;
6. Nongsusan Homeshopping;
7. the channel known at the time of the Austrade report in 2017 as “VTV Hyundai Homeshopping” and now known as Hyundai Homeshopping (which is our client's parent company).

On the basis of figures extracted from the DART (Data Analysis, Retrieval and Transfer) system which is operated by the Financial Supervisory Service (which is South Korea's regulator of financial services), the total size of the South Korean television home shopping market in 2018 is estimated to be in excess of \$A6.5billion annually.

The fact that our client is able to offer access to the South Korean home shopping market to Australian suppliers of goods is an important aspect of our client's ability to secure suppliers of goods. Of course, Australian suppliers will not be able to obtain this access if they are prevented, as a condition of entering into an agreement with TVSN, from also dealing with our client.

However the nature of the South Korean market is also of particular relevance to the assessment of the Notification, because it provides a practical example of the way in which a competitive market can and should operate. If TVSN is successful in preventing the development of a competitive market for television shopping network services in Australia, then all the benefits which would accrue to both consumers, and to Australian suppliers, would be lost.

At paragraph 6 of the Notification, TVSN asserts that “it is usual practice in other countries that product lines or brands are only promoted and distributed on a singularly owned shopping network”. No evidence is provided to support this assertion, and at least as far as the South Korean television shopping network market is concerned, our client considers that the assertion is wrong. Attached to this letter and marked “A” is a bundle of screenshots from the websites of different Korean television shopping networks which our client has prepared for the purposes of this response. The screenshots indicate that a number of different South Korean shopping channels simultaneously offer goods manufactured by the same manufacturer with and this is demonstrated (not as an exhaustive list, but by way of example only) in relation to:

1. Samsung; and
2. Dr.Jart+ (a Korean matter manufacturer of beauty products; and
3. Dyson.

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<sup>1</sup> Available at <https://www.austrade.gov.au/ArticleDocuments/1358/E-Commerce-Korea-Guide.pdf.aspx>

### **Competition in the relevant market in relation to goods from the same supplier**

We have set out above the benefits to suppliers of having access to multiple players in the television shopping network format. Competition between participants in the television shopping network market is also of benefit to consumers, as can be demonstrated by the example of the sale by our client, of products from the same supplier.

The first example is in relation to the "Legmaster". During the short period of time in which our client has been operating in Australia, it has sold, amongst other products, a product called the "Legmaster". The Legmaster is a piece of fitness equipment which enables people to tone and strengthen particular muscle groups in the legs and elsewhere in the body. The "Legmaster" is supplied to our client (and our client assumes, to TVSN) by Rockin Direct.

As at the date of this letter, our client offers the "Legmaster" for sale for \$159, including free delivery. Our client also offers consumers the opportunity to spread the payment over four payments using Afterpay. Although TVSN's website indicates that the "Legmaster" "is sold out or no longer available", that website also indicates a price of \$159 with an additional delivery charge of \$9.95. Further, the TVSN website only offers the option of spreading the cost over two payments, and does not offer consumers the option of using Afterpay. Screenshots from TVSN's website and from our client's website prepared for the purpose of this response are attached and marked "B".

This is a practical example of competition in action when one supplier supplies the same product to both TVSN and to our client. If TVSN was permitted to engage with suppliers on an exclusive basis, any competition in relation to the "Legmaster" in the television shopping network channel would have been entirely foreclosed.

Other examples of competition involve the suppliers Samsung, Django & Juliette, and Diana Ferrari. Prior to the commencement of our client's operations, each of those suppliers offered their products for sale on TVSN. Since the arrival of our client into the Australian television shopping network marketplace, each of those suppliers have also offered their products for sale on our client's television shopping network.

For the purposes of responding to the Notification, our client has prepared a bundle of historical and current screenshots from TVSN's website, and from our client's website, which is attached to this letter and marked "C". Those screenshots show that in respect of each of those suppliers, TVSN has appeared to have responded to the decision of those suppliers to deal with our client by offering those suppliers' goods for sale at clearance prices. Accordingly, the benefit to consumers of competition between television shopping networks is not merely theoretical but is demonstrated by the fact that TVSN has offered lower prices to consumers as part of its strategy to compete with our client.

### **TVSN's stated purposes disclose no public benefit**

Paragraph 9.4 of the Notification sets out the purposes for which the notification is sought. Those purposes are then developed further in paragraph 10 of the Notification in an attempt to establish that the purposes give rise to a public benefit which is said to arise from the exclusive dealing in which TVSN wishes to engage.

Without seeking to deal exhaustively with each and every purpose, our client submits that either taken together or individually, the purposes do not disclose any public benefit.

In particular:

1. As noted above, our client is a subsidiary of the leading home shopping channel operator in South Korea. Our client does not wish to (and does not need to) "free-ride" on anything which is being done by TVSN. Rather, our client's intention is to grow and

develop the television shopping network market in Australia. To do that our client will need to build and develop its own unique brand (albeit based upon the knowledge available to our client from the experiences of its market-leading South Korean parent company);

2. it is a characteristic of goods which are suitable for sale by television shopping network that they have a "brand story" which lends itself to a more detailed explanation than can be conveyed in, for example, a 30 second television commercial. However, the "brand story" does not belong to TVSN (or to our client) - it belongs to the supplier. Accordingly, to the extent that TVSN asserts that it is entitled to protect "consumer interest" in the product which features (see paragraph 9.4(a)(2) of the Notification) that assertion is no more and no less than an attempt by TVSN to appropriate to itself an asset which belongs to the supplier, not to TVSN;
3. The suggestion that TVSN has developed some valuable method of promoting and selling goods which is known to TVSN alone must be rejected - first, because the demonstration of goods to the public on television is the antithesis of confidential activity, and secondly, because many of the matters referred to by TVSN are simple common sense. For example, it is obvious that any trader wishing to sell goods through a TV shopping network format would:
  - a. seek to source goods which are "reputable, exciting and appealing" (see paragraph 10(1)(i) of the Notification); and
  - b. require the trader's employees to have "an in-depth knowledge of the products and product line being featured" (see paragraph 10(1)(iv) of the Notification); and
  - c. ensure that the trader's employees were well versed in the Australian Consumer Law (see paragraph 10(1)(xi) of the Notification);
4. Although our client does not believe that TVSN suppliers are provided with any information which could properly be capable of being characterised as confidential information (such as the asserted "TVSN's proprietary TV shopping selection information sales metrics data" referred to in paragraph 9.4(a)(iv) of the Notification), if TVSN does disclose that information to its suppliers, then that information is capable of being protected by confidentiality provisions in the contracts between TVSN and its suppliers. It is entirely in the keeping of TVSN to determine whether it discloses any confidential information to its suppliers, and it is not necessary, in order to protect any confidential information which is disclosed, to prevent those suppliers from dealing with our client;
5. The proposition that TVSN is entitled to prevent the "dilution" of interest in its products by preventing those products from being sold by trade rivals need only be stated aloud to be rejected. No doubt Woolworths would like to prevent "dilution" of its customers' interest in grocery products by preventing those products from being sold by Coles, but that is plainly not a justifiable basis to prevent competition in a market.

If our client's primary position (namely, that TVSN has failed to establish any public benefit at all) is accepted, it follows that the balancing exercise between public benefit and public detriment does not arise because the Notification fails at the first hurdle of section 93(3)(b(i) of the Act.

However, even if some public benefit can be discerned from the matters relied upon by TVSN in the Notification, that public benefit is outweighed (for all of the reasons set out above) by the public detriment in enabling TVSN to entrench its power in the relevant market. TVSN no longer holds monopoly power in that market, and should not, accordingly, be permitted to monopolise particular suppliers.

**Conclusion**

For the reasons set out in this submission, the Commission should revoke the Notification by giving to TVSN notice pursuant to section 93(3) of the Act.

Please contact the writer if you wish to discuss further anything arising from this letter.

Yours faithfully

**StevensVuaran Lawyers**



Angus Macinnis

Tel: 

# Attachment A

## 1. Samsung

TVSN

<https://www.itvsn.com.au/search/samsung?searchstring=samsung>

The screenshot shows the TVSN website's search results for Samsung. At the top, there is a search bar with 'Search TVSN' and a magnifying glass icon. To the right, there is a user profile icon with 'Welcome My Membership', a heart icon, and a shopping bag icon with '0'. Below the search bar, there are navigation links: 'Shop Departments', 'Today's Special Offer', 'Community', 'TV Guide', and 'Watch'. A breadcrumb trail shows 'SAMSUNG'. On the left, there are filters for 'SHOP BY CATEGORY' (Clearance Products, TVs & Accessories, Audio & Music) and 'PRICE' (Less than \$50, \$51 - \$100, \$101 - \$200, \$201 - \$300, \$301 - \$400, \$401 - \$500, More than \$500). The main content area displays three products, all marked as 'CLEARANCE':  
1. Samsung 65-inch Series-7 RU7100 4K Ultra HD LED LCD Smart TV (Item #071028) for \$1199.00 (original price \$1749.00).  
2. Samsung Series-4 2.1ch 200W Soundbar w/Subwoofer (Item #071021) for \$229.00 (original price \$349.00).  
3. Samsung HW-M360/XY 2.1ch Soundbar with Subwoofer (Item #070212) for \$229.00 (original price \$299.00).  
A 'VIEW: 60' dropdown is located at the bottom right of the product grid.

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This section repeats the website header, including the TVSN logo, search bar, user profile, and navigation links. The breadcrumb trail now shows 'Electronics > Samsung'.

The product detail page for the Samsung 65-inch TV (Item #071028) features a large image of the TV displaying a landscape scene. Below the image is a 'Hover to Zoom' button. To the right of the image, the product name 'Samsung' is displayed in bold, followed by the full product name: 'Samsung 65-inch Series-7 RU7100 4K Ultra HD LED LCD Smart TV'. There are five stars and '(0 reviews)'. The price is listed as 'TVSN Price \$1,749.00' and 'Clearance Price \$1,199.00'. Below the price, it says 'or 8 Easy Payments of \$149.88' and 'Delivery \$49.80'. A checkbox is present with the text 'Select here for 8 easy payments of \$149.88 per month'. At the bottom, there is a quantity selector set to '1', an 'ADD TO BAG' button, and a 'QUICK CHECKOUT' button. A note at the bottom states 'Courier delivery only - No PO Box'. Below the main image are three smaller thumbnail images showing different views of the TV.



Openshop

<https://www.openshop.com.au/search?keyword=samsung>

 <p>Samsung Galaxy Watch Active 2 44mm Rose Gol...</p> <p><b>\$499.00 9% OFF</b> \$548.00</p> <p>★★★★★ 1</p>	 <p>Samsung Series 7, 50 inch, 4K UHD TV RU7100</p> <p><b>\$795.00 36% OFF</b> \$1,249.00</p>	 <p>Samsung Series 7, 55 inch, 4K UHD TV RU7100</p> <p><b>\$895.00 40% OFF</b> \$1,499.00</p>	 <p>Samsung Series 7, 65 inch, 4K UHD TV RU7100</p> <p><b>\$1,295.00 35% OFF</b> \$1,999.00</p>
 <p>Samsung Series 7, 75 inch, 4K UHD TV RU7100</p> <p><b>\$1,995.00 30% OFF</b></p>	 <p>Samsung Series 8, 55 inch, 4K UHD TV RU8000</p> <p><b>\$1,295.00 32% OFF</b></p>	 <p>Samsung Series 8, 65 inch, 4K UHD TV RU8000</p> <p><b>\$1,495.00 45% OFF</b></p>	 <p>Samsung 7.5kg/4kg Front Load Washer / Dryer...</p> <p><b>\$1,199.00</b></p>



Search for items

My openshop | Customer Service

WATCH NOW BRANDS SALE DEALS SPECIAL OFFER

Home > Home Appliances > All Home Appliances

FREE DELIVERY



Samsung Series 7, 65 inch, 4K UHD TV RU7100

openshop Price ~~\$1,999.00~~  
Now **35% OFF** **\$1,295.00**

Brand **Samsung**  
Item Code 300665  
Delivery Information Free Delivery

Quantity/Price  **\$1,295.00**

Total Price **\$1,295.00**

BUY NOW

ADD TO CART

## 2. Trophy Skin

TVSN

<https://www.itvsn.com.au/product/202631&source=googleps?gclid=EALalQobChMIhtGnroCC5wI VjxiPCh14FQ- EAQYASABEgIqVvD BwE>

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tvsn Search TVSN Welcome My Membership

Shop Departments Today's Special Offer Community TV Guide Watch

Beauty

202631 Trophy Skin Trophy Skin MiniMD Handheld Microderm System (21 reviews) TVSN Price \$149.00 Was \$99.95 Clearance Price \$79.95 Delivery \$790

We are sorry, this product is sold out or no longer available

Openshop

<https://www.openshop.com.au/product/300224>

open shop Search for items My openshop Customer Service

WATCH NOW BRANDS SALE DEALS SPECIAL OFFER

Home > Beauty > All Beauty

FREE DELIVERY

Trophy Skin Mini MD

openshop Price \$149.00 Now \$149.00 or 4 payments of \$37.25 with afterpay LEARN MORE

Brand Trophy Skin Item Code 300224 Delivery Information Free Delivery

Quantity/Price 1 \$149.00

Total Price \$149.00

### 3. Django & Juliette

TVSN

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tvsn Search TVSN Welcome My Membership

Shop Departments Today's Special Offer Community TV Guide Watch

Shoes & Handbags

529615 **Django & Juliette**  
 Django & Juliette Sparkle Leather Lace Up Boot  
 (3 reviews)  
 TVSN Price ~~\$209.00~~  
 Was ~~\$79.95~~  
**Clearance Price \$69.95**  
 Delivery \$7.90

Choose An Option

Size: 5 6 7 8 9 10 11  
[View size charts](#)

Qty: - 1 + **ADD TO BAG** **QUICK CHECKOUT**

### Openshop

open shop Search for items My openshop Customer Service

WATCH NOW BRANDS SALE DEALS SPECIAL OFFER

Home > Shoes > Boots

**FREE DELIVERY**

**Django and Juliette - Paco Black Leather Shoe**

openshop Price \$179.95  
 Now **50% OFF** **\$89.95**  
 or 4 payments of \$22.49 with **afterpay** [LEARN MORE](#)

Brand [Django & Juliette](#)  
 Item Code 300091  
 Delivery Information **Free Delivery**

Option [SIZE GUIDE >](#)  
 Select Option

Total Price **\$89.95**

**BUY NOW** **ADD TO CART**

### 4. Diana Ferrari

TVSN

tvsn Search TVSN Welcome My Membership

Shop Departments Today's Special Offer Community TV Guide Watch

Shoes & Handbags

528948 **Supersoft**  
Supersoft by Diana Ferrari Elgine Metallic Leather Slingback  
★★★★★ (0 reviews)  
TVSN Price \$159.00  
Was \$54.95  
**Clearance Price \$44.95**  
Delivery \$7.90

Choose An Option

Size: 5 6 7 8 9 10 11  
View size charts

We are sorry, this product is sold out or no longer available

Openshop

open shop Search for items Sign In Customer Service

WATCH NOW BRANDS SALE DEALS SPECIAL OFFER

Home > Shoes > Boots

FREE DELIVERY

**Diana Ferrari -Podium Ankle Boot**

openshop Price \$189.95  
Now 47% OFF **\$99.95**  
or 4 payments of \$24.99 with **afterpay** [LEARN MORE](#)

Brand [Diana Ferrari](#)  
Item Code 300195  
Delivery Information Free Delivery

Option [SIZE GUIDE](#)  
Select Option

Total Price **\$99.95**

BUY NOW ADD TO CART

# Attachment B

## Legmaster - TVSN

The screenshot shows a web browser window with the TVSN website. The browser's address bar shows the URL [itvsn.com.au/product/028725](https://itvsn.com.au/product/028725). The website header includes the TVSN logo, a search bar, and user account options. The main navigation menu contains links for Shop Departments, Today's Special Offer, Community, TV Guide, and Watch. The product page for the Leg Master (ID 028725) is displayed, featuring a large image of the blue exercise machine, a 5-star rating from 54 reviews, and a price of \$159.00. A pink message box indicates that the product is sold out or no longer available.

TVSN - Leg Master

itvsn.com.au/product/028725

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tvsn Search TVSN Welcome My Membership

Shop Departments Today's Special Offer Community TV Guide Watch

Home > Health & Fitness

028725 Leg Master (54 reviews)

**TVSN PRICE \$159.00**  
or 2 Easy Payments of \$79.50  
Delivery \$9.90

Select here for 2 easy payments of \$79.50 per month

We are sorry, this product is sold out or no longer available

YOU MIGHT ALSO LIKE

# Legmaster - Openshop

Leg Master | openshop

openshop.com.au/product/300030

open shop


Search for Items

Sign In | Customer Service

WATCH NOW BRANDS SALE DEALS SPECIAL OFFER

Home > Health and Fitness > All Health and Fitness

FREE DELIVERY



Leg Master

openshop Price ~~\$159.00~~  
Now **\$159.00**  
or 4 payments of \$39.75 with **afterpay** [LEARN MORE](#)

Brand [Leg Master](#)  
Item Code 300030  
Delivery Information Free Delivery

Quantity/Price  \$159.00

Total Price **\$159.00**

[BUY NOW](#) [ADD TO CART](#)

[Description](#) [Item Review 4](#) [Q&A 4](#) [Delivery Information](#) [Return/Exchange](#)

### Attachment C

## Korean shopping network – competition examples

### 1. Samsung

#### CJ Mall

<http://display.cjmall.com/p/search/searchAllList?k=samsung&searchType=ALL>

The screenshot shows the CJ Mall search results for 'Samsung'. At the top, there is a search bar with 'samsung' entered. Below the search bar, there are navigation tabs for 'category', 'TV+', 'TV shopping', 'home', 'Oclakdil', '22% benefit', 'Snow food', 'outlet', 'Daily UP', and 'Department store'. The main content area is titled "'Samsung' Search results 7861 more". On the left, there is a sidebar with various filters including 'category', 'Recommended Brand', 'Specialty store', and 'Benefit / Shipping'. The main content area features a 'Today's Deal' section with two products: an LG UltraHD TV and a Winix air purifier. Below this is a 'Trusted Broadcast Products' section showing Samsung air purifiers and a TV. At the bottom of the screenshot, there is a search bar with the text 'Earn up to 10% CJ Spam Gift Set + 300,000 Won Gift Car'.

The screenshot shows the detailed product page for the Samsung AX80R7580WDD air purifier. The product name 'AX80R7580WDD' is prominently displayed at the top. Below the name, there is a large image of the air purifier. To the right of the image, there is a price tag of '599,000 KRW' with a 'View' button. Below the price, there are several promotional messages: 'Smile Pay 10% discount from KRW 539,100 and up', 'KB Kookmin Card charges a 5% discount 569.05 thousand won', and 'Smile Pay 7% discount from KRW 557,070'. There is also a 'View more' button. Below the promotional messages, there is a 'Receive 5,000 Won before purchase' and 'View card interest-free benefits (up to 6 months)' section. At the bottom, there is a 'Single product' section with a quantity selector set to '1' and a price of '599,000 KRW'. On the right side of the page, there is a 'Customer Consultation' chat window and a 'Shopping' section with a 'TOP' button and 'Download App' link.



# GS Shop

<https://www.gsshop.com/shop/search/main.gs?lseq=392814&tq=samsung&initSrchYn=Y&ab=b&g sid=gnb-AU392814-AU392814-1>

GS fresh 눈뜨면 도착, 새벽배송!
 핫한 브랜드 행사 GS X 브랜드
 1.14 (Tue) Samsung Card 5 % Discount

**GS SHOP**

My Shopping shopping basket

category
TV Schedule
Tomorrow TV
TV Products
Today's Recommendation
GS X Brand
Tomorrow
GS Fresh
Today's Open
Now BEST
loginGS
Sign Up
Service center
Direct connection ON

## 'samsung' Search Results (71,802)

- category**
- I love you stupid (51,698)
  - 1300K (5,158)
  - Notebook / PC / Tablet (4,752)
  - Artbox poom (3,545)
  - Air Cleaning & Seasonal Appliances (1,657)
  - Interpark Library (764)
  - TVs / Fridges / Washing Machines (649)
  - 10x10 (646)
  - Bondi & Lunis (641)
  - Car Accessories (416)
  - Office Supplies / Kidult / Hobby (311)
  - Smart Home / Cell Phones (278)
  - Book Collection (246)
  - Home Appliances (204)
  - Home Decor / Interior Accessories (196)
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TV Products (201)
Department Store (2)

Popular
  Low to high
  High to low
  Reviews
  Recently registered

결과내 재검색  < 1 / 1197 >

<p><b>DVI6R8540KP</b></p> <p>[TV products] [Samsung] Dryer Grande 16kg Silver DV16R8540KP</p> <p>5% 1,840,000KRW</p> <p><b>1,740,000 KRW</b></p> <p>292 Buy Now</p>	<p><b>삼성 노트북 5</b></p> <p>[TV Product] [Advanced Pack_Metallic Titanium] Samsung Notebook 5</p> <p>8% 1,079,000₩</p> <p><b>989,000 KRW</b></p> <p>211 Pieces Available</p>	<p><b>삼성 노트북 5</b></p> <p>[TV Product] [Advanced Pack] Samsung Notebook 5 NT550EBE-</p> <p>8% 1,079,000₩</p> <p><b>989,000 KRW</b></p> <p>521 Buy Now</p>	<p><b>DVI6R8540KP + WF19R8600KP</b></p> <p>[TV products] [Silver Package] Samsung Dryer 16kg + Bubble Shot</p> <p>7% 2,960,000-KRW</p> <p><b>2,740,000 KRW</b></p> <p>110 On Purchase</p>
<p><b>삼성 노트북 7</b></p>	<p><b>삼성 노트북 5</b></p>	<p><b>SAMSUNG</b></p>	<p><b>SAMSUNG</b></p>

**ON-AIR**  
 01:03:52  
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 shopping basket  
  
 Steamed  
  
 Wish brand  
**Recently Viewed Products**  
  
  
**TOP**





방송시간 내일 13:30 243개 구매중

**[TV상품] 삼성 블루스카이 7000 공기청정기 24형 AX80R7580WDD**

★19년출시모델! 최고급 14프라이팬 3종세트 증정★

★★★★★ **4.8점** (30) > [삼성 브랜드샵 >](#)

659,000원  
**9% 599,000원** [?](#) 10,000원 쿠폰 [?](#) [미리계산](#)

카드즉시할인가 569,050원 삼성 5% [?](#)  
 무이자 최대 36개월 [?](#)  
 배송정보 업체(설치)배송 1/28(화) 도착예정 [?](#) 무료배송

사은품  
쿠비눅스 인덕션 프라이팬 3종

삼성 블루스카이 7000 공기청정기 24형 AX80R7580WDD - 1 + 599,000원

ON-AIR

00:04:02

**구매하기**

TV편성표

장바구니

찜

찜한 브랜드

최근분상품

TOP

## Lotte Mall

[http://www.lotteimall.com/search/searchMain.lotte?slog=80060\\_1&headerQuery=samsung&lvl1\\_cate\\_no=&lvl2\\_cate\\_no=&lvl3\\_cate\\_no=&lvl4\\_cate\\_no=&lvl5\\_cate\\_no=&cateDepth=1&selected\\_filter=&rccode=pc\\_detail4](http://www.lotteimall.com/search/searchMain.lotte?slog=80060_1&headerQuery=samsung&lvl1_cate_no=&lvl2_cate_no=&lvl3_cate_no=&lvl4_cate_no=&lvl5_cate_no=&cateDepth=1&selected_filter=&rccode=pc_detail4)

9,621,000 원  무료배송

가격적용  스마트픽  롯데백화점

전체 (24,948) [롯데백화점 \(64\)](#) [TV쇼핑 \(230\)](#)

정렬순: 낮은 가격순 | 높은 가격순 | 판매 BEST순 | 최근등록순 | 상품평순 60개씩 보기

<p><b>삼성 갤럭시 비즈 2019</b></p> <p>[삼성전자(주)](정품) 삼성전자 무선 블루투스 이어폰 갤럭시 비...</p> <p><b>141,550원</b> 149,000원</p> <p>주목5%</p> <p>상품평 121</p>	<p><b>TV쇼핑</b></p> <p>[프리미엄픽] 삼성 노트북 5 화이트 / 맥달릭 티탄 [NT550EBE-K288S...</p> <p><b>989,000원</b> 1,079,000원</p> <p>상품평 7</p>	<p><b>TV쇼핑</b></p> <p>[*가격인하*][65] 삼성 Premium UHD TV 163cm [UN65RU7...</p> <p><b>1,400,000원</b> 1,490,000원</p> <p>상품평 0</p>	<p><b>NT550EBA-K38WS/K38BS</b></p> <p>[*고급픽*] 2020년 프리미엄! 삼성 노트북5 NT550EBA-K38WS/K38B...</p> <p><b>999,000원</b> 1,099,000원</p> <p>상품평 0</p>
<p><b>R563R557EB4</b></p>	<p><b>RF85N9003GI</b></p>	<p><b>VC33M4111LY</b></p>	<p><b>UN65RU6990FXKR</b></p>

**가격을 매우쳤다** 가격은 내리고 혜택은 올리고! TIME SALE 10:00 ~ 14:00  
방송 이월상품 특가전  
20,000원~ 2020 설 마음한상  
롯데백화점 고품격 설 선물 제안

# 롯데홈쇼핑

★진도콜레베 설맞이 라스트 찬스!



LIVE TV ONETV 롯데백화점 올드템 베스트 이벤트 | Lounge #LETIT COCOYA 해외배송

- 식품
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- 스포츠
- 잡화
- 뷰티
- 화장품
- 출산
- 주방
- 가구
- 가전
- 여행
- 반려
- 해외

홈 > TV/냉장고/세탁기/계절가전 > 제습/공정/가습 > 공기청정기 >



**블루스카이 공기청정기 AX80R7580WDD**



삼성전자 >

삼성전자 블루스카이 공기청정기 AX80R7580WDD

692,000원  
**4%** **665,200원**  
(26,800원 할인)

정구할인가 **618,640원** (L.pay 롯데카드 7%)

배송정보 택배 (무료배송)

엘포인트 일반회원 692원

L.CLUB회원 6,920원 **L.CLUB가입 >**

추가혜택 무이자 최대 6개월 / 카드SAVE

통화가능연락처 입력해 주세요

단일상품

- 1 +

주문금액

**665,200원**



장바구니

**바로구매**

L.pay  
롯데카드  
청구할인  
**7%**

TV  
NH카드  
청구할인  
**5%**



브랜드 ON  
헤리스/디스  
특별한 혜택  
~15% 적립  
TOP

H Mall

<https://www.hyundaihmall.com/front/pde/search.do?searchTerm=samsung&gnbSearchYn=Y>

카테고리

- 정보기기 (19,092)
- 패션의류 (14,000)
- 패션잡화 (6,426)
- 스포츠/레저 (4,739)
- 전기/전자 (2,404)
- 유아동 (1,064)
- 문화/취미 (300)
- 보석/장신구 (162)
- 주방 (117)
- 생활/건강 (93)

더보기 +

매장구분

- 현대Hmall
- 현대백화점
- TV방송상품
- 현대아울렛

"samsung" 검색결과 (48,831)

방송/방송예정상품 (86)

더보기 >

 <p><b>SAMSUNG</b></p> <p>삼성 파워모션 진공청소기 [VC33M7111LB]</p> <p>339,000</p> <p><b>291,600원</b> 14%</p> <p>상품평(24)</p> <p>삼성5% · 무12 · 무료배송</p>	 <p><b>SAMSUNG</b></p> <p>삼성 직배송 / 전문가사 무료설치 삼성 액티브워시 16kg [WA16N6780TG] (사은품 : 삼성 공기 779,000)</p> <p>779,000</p> <p><b>654,720원</b> 16%</p> <p>상품평(1,086)</p> <p>NH7% · 무12 · 무료배송</p>	 <p><b>SAMSUNG</b></p> <p>삼성 직배송 / 전문가사 무료설치 삼성 프리미엄 UHD TV 163cm [UN65RU7470FXKR] (사은품 : 1,540,000)</p> <p>1,540,000</p> <p><b>1,450,000원</b> 6%</p> <p>상품평(38)</p> <p>NH7% · 무12 · 무료배송</p>
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**SAMSUNG**

삼성 블루스카이 공기청정기 7000 [AX80R7580WDD]

(사은품 : 침구 청소기)

659,000원

**599,000원**

AX80R7580WDD

상품코드 : 93248752 복사하기



총 10개구매 ?

삼성 직배송 / 전문가사 무료배송 [★무이자36개월★]

삼성 블루스카이 공기청정기 7000 [AX80R7580WDD]

(사은품 : 침구 청소기)

659,000원

**599,000원** 9%

(선택1 삼성 블루스카이 공기청정기 7000 [AX80R7580WDD] 기준)

H.Point TV쇼핑 10%적립 >

즉시할인가 [모바일 구매 혜택]

569,050원 5% 삼성카드 (60,000원 1)

557,070원 7% NH카드 (300,000원 1)

설치배송비 무료배송

2. DR JART Examples (Korean beauty Brand)





'DR jart' search results 167 dogs



product

video

- category
- Cosmetic / Perfume
  - Hair / Body / Beauty Device
- Recommended Brand
- Dr.Jart
- Skin trouble More +
- moisture
  - elasticity
  - pore
  - trouble
  - wrinkle
- Skin type
- for all skin type
  - inattention
  - Intelligence
  - Complexity
  - Sensitivity
- Specialty store

There are 167 products.

Recommen [grid icon] [list icon]



[1.13-15 10% Earn] Dr.Jart 2020 New Year Gift Set / 5% Additio  
**25,650** won ~

syopeul 5% Free Shipping  
Buy



Cream Pair Pair Double Set / CP A0293K1 / Dr.Jart + Cicapair Cre  
**25,650** won

syopeul 5% Free Shipping  
Buy



Dr.Jart + Cicapair Calming Mask  
**2,000** won

Buy



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SAMSUNG

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추천순 | 낮은가격순 | 높은가격순 | 최근등록순 | 상품평수순 | 상품평점수순 | 판매량순

30개씩 보기

바로접속 ON



TV소핑 온라인전용

닥터자르트 캡슐앰플에 선물을 쇼...  
닥터자르트 바이탈 하이드라 솔루션  
캡슐앰플 기프트패키지

89,000원

상품평(1,009)

삼성5% · 무3 · 무료배송



TV소핑 온라인전용

닥터자르트 캡슐앰플집중 패키지 X ...  
닥터자르트 바이탈 하이드라 솔루션  
캡슐앰플 앰플집중 관리구성

148,000

133,200원

10%

상품평(1,007)

삼성5% · 무3 · 무료배송



TV소핑 온라인전용

닥터자르트 시카페어 패키지 X 현대...  
닥터자르트 시카페어 크림세럼 현대  
단독패키지

69,000

62,100원

10%

상품평(1,009)

삼성5% · 무3 · 무료배송



NH카드  
7% 즉시할인

< 1/2 >

최근 본 상품



TOP

Q

제외

Q



TV소핑 온라인전용

단품  
닥터자르트 바이탈 하이드라 솔루션  
캡슐 앰플 1BOX

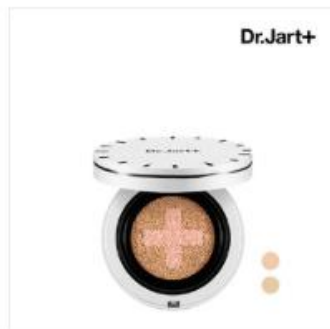
69,000

62,100원

10%

상품평(1,007)

삼성5% · 무료배송



온라인전용

[닥터자르트/Dr.Jart] 더메이크업 핏 쿠션  
기희세트

37,000

35,150원

5%

상품평(6)

무료배송



TV소핑 온라인전용

닥터자르트 바이올X시카 단독패키지  
닥터자르트 가성비갑 심플패키지

49,000

44,100원

10%

상품평(2)

무료배송



DYSON  
GS Shop

[https://www.gsshop.com/shop/jbp/main.gs?jbpBrandCd=100000546&lseq=414301-10\\_2](https://www.gsshop.com/shop/jbp/main.gs?jbpBrandCd=100000546&lseq=414301-10_2)

CJ Mall

<http://display.cjmall.com/p/search/searchAllList?k=dyson&searchType=ALL>

Lotte Mall

[http://www.lotteimall.com/search/searchMain.lotte?slog=80060\\_1&headerQuery=dyson&lv1\\_cate\\_no=&lv2\\_cate\\_no=&lv3\\_cate\\_no=&lv4\\_cate\\_no=&lv5\\_cate\\_no=&cateDepth=1&selected\\_filter=&rcode=pc\\_detail4](http://www.lotteimall.com/search/searchMain.lotte?slog=80060_1&headerQuery=dyson&lv1_cate_no=&lv2_cate_no=&lv3_cate_no=&lv4_cate_no=&lv5_cate_no=&cateDepth=1&selected_filter=&rcode=pc_detail4)

연관검색어 #dyson airwrap #dyson complete #dyson wrap #dyson v11 #dyson 헤어 #dyson supersonic #dyson hair #dyson v8

카테고리	브랜드	가격	색상	상세조건
<b>가전/디지털</b> TV/냉장고/세탁기/계절가... (60) 주방/생활/이미용가전 (54) <b>롯데백화점</b> 생활/가전 (30) 여행/해탁/교육	상품수순 가나다 순 <input type="checkbox"/> 다이슨 (158) <input type="checkbox"/> 바보사랑 (3) <input type="checkbox"/> 비제이 (2) <input type="checkbox"/> 밤나무 (1) <input type="checkbox"/> 로알스타 (1)	10 ~ 1,276,000 원 가격적용	<input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/>	<input type="checkbox"/> 상품평 20개 이상 <input type="checkbox"/> 축적 쿠폰 적용 상품 <input type="checkbox"/> 무료배송 <input checked="" type="checkbox"/> 스마트픽 <input type="checkbox"/> 롯데백화점

전체 (165) 롯데백화점 (36) TV쇼핑 (12) 결과 내 재검색

정렬순 | 낮은 가격순 | 높은 가격순 | 판매 BEST순 | 최근등록순 | 상품평순 60개씩 보기

<p><b>TV쇼핑</b> Dyson airwrap 헤어스타일러 다이슨 에어랩 컴플리트(co... 569,000원 599,000원</p>	<p><b>TV쇼핑</b> Dyson V11 220 에어와트 CF+_air watts cf-... 1,110,000원 1,190,000원</p>	<p><b>TV쇼핑</b> Dyson airwrap 헤어스타일러 볼륨 앤 셰이프 (volume+shape) 509,000원 539,000원</p>	<p>[시크릿상품][신상품][다이슨 공식파트너] 무선청소기 V10 카본파이버 프로(160... 601,520원 617,500원 쿠폰2%</p>
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Hmall

<https://www.hyundaihmall.com/front/pde/search.do?searchTerm=dyson&gnbSearchYn=Y>

Hmall 프로그램 | 회원가입 | 고객센터

카테고리 dyson

국립팀 TV쇼핑 TV플러스샵 현대백화점 이벤트/쿠폰 주간베스트 옥답마켓 임시관당

"dyson" 검색결과 (236)

연관검색어 다이슨 다이슨에어랩 다이슨드래거기

방송/방송예정상품 (3)

<p><b>120%</b> H드림트루 14만 포인트로 중정 대박... 다이슨 무선 진공청소기 V11 CF-... 1,190,000 1,110,000원 7% 상품평(8) N47% · 무료배송</p>	<p><b>120%</b> 다이슨(본사직접)헤파프리미디어투... 다이슨 가습기 헤파이제닉 미스트 AM10 449,000 419,000원 7% 상품평(46) N47% · 무료 · 무료배송</p>	<p><b>120%</b> 다이슨 무선 청소기 V7 플러피 498,000 448,000원 10% 상품평(726) N47% · 무료 · 무료배송</p>
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추천순 | 낮은가격순 | 높은가격순 | 최근등록순 | 상품평수순 | 상품평점수순 | 판매량순 30개씩 보기

지정선택  미아점