

23 March 2020

Attention: Tom Leuner
Australian Competition & Consumer Commission

Submission – Application for merger authorisation MA1000019, Gumtree and Cox Media

MotorWeb thanks the ACCC for the opportunity to comment on its preliminary views relating to Gumtree's application for authorisation to merge with Cox Media. We are a supplier of motor vehicle information in Australia, including to Gumtree, and are owned by Trade Me, New Zealand's leading online marketplace and classified advertising platform.

We have no concerns about the proposed merger, and we wish to make two observations on issues the ACCC has sought comment on.

The first is that we believe that the ACCC's preliminary view that there is a separate market for the supply of online display advertising on automotive classified platforms is an overly narrow market definition. The commercial reality is that display advertising (like all digital advertising) is highly substitutable across all manner of websites. Classifieds websites compete with any number of other websites to supply display advertising to advertisers.

Second, we believe that Facebook Marketplace is a significant and growing competitive presence and constraint in online classifieds markets around the world. Australia is no different. Facebook Marketplace is and will continue to act as a very real competitive constraint on all other participants in the market. By itself, we believe that Facebook Marketplace's existing presence and its capacity to quickly grow would provide enough competitive constraint on the merging parties.

If you have any questions or need any further information, please feel free to contact Stella Kasoulides Paulson, Acting Head of Legal, Regulatory & Risk (via [REDACTED]).

Kind regards,

Alan Clark

Head of Motors, Trade Me Group