

Submission from the Avenues Publishing Company Limited

7.6.04

Re: The Acquisition by Archant Ltd of Independence News and Media

Following your letter regarding the above and our brief telephone conversation regarding the timing of my response, I now write with comments and views accordingly.

The Avenues Publishing Company Limited publishes 2 editions of *Avenues*; a weekly newspaper currently biased towards property advertising, covering local community news and seeking to expand its general advertising and editorial content. Its areas of free distribution are Highgate, Hampstead, Camden Town Kentish Town Muswell Hill, Hornsey, Hackney, Bethnal Green, Islington, Bow, Hoxton via letterbox distribution as well as various tube station and strategic point pickup. Our comments are based on these areas as our areas of knowledge.

We consider that the acquisition by Archant Limited of the London Regional division of Independent News and Media will cause a substantial lessening of competition within the North, North West and East London markets and will affect us as a small independent publisher and will reduce/effect the choice for readers and advertisers alike. Major newspaper groups already hold substantial interests in both free and paid for newspapers in local media markets and enjoy economy of scale over small independent publishers which provides a platform for them to negotiate better prices for printing, distribution etc as well as finding it easier to attract good staff. - all of which make for a less competitive market and create major barriers to entry for new business.

Should Archant take over the operations of titles in London combining with their existing titles, the Avenues Publishing Company would have to compete on a far less than level playing field with yet more powerful competition who could inflict various non-competitive initiatives on the advertising markets as is common practise in a monopoly or near monopoly situation.

Yours sincerely

Eve Atkins
Managing Director