



28th June, 2019

Ms Elizabeth Elias
Senior Analyst
Australian Competition and Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2601

Dear Ms Elias

AP Eagers proposed acquisition of AHG

I refer to the market feedback letter issued by the ACCC on 24 June 2019 setting out the ACCC's preliminary views in relation to the application for authorisation made by A.P. Eagers Limited (**AP Eagers**) in respect of its proposed acquisition of Automotive Holdings Group Limited (**AHG**).

Jaguar Land Rover Australia has reviewed the ACCC's market feedback letter and understands that the ACCC's preliminary view is that the proposed acquisition is unlikely to substantially lessen competition for the supply of new cars in Melbourne, Sydney and Brisbane or nationally, the wholesaling and retailing of used cars, the acquisition of car dealerships or the supply and acquisition of finance and insurance products, but that the proposed acquisition could have an adverse impact on:

1. the size of discounts customers could obtain when buying new cars in the Newcastle/Hunter Valley region;
2. the supply of authorised parts in the Newcastle/Hunter Valley region; and
3. the market for servicing new cars in the Newcastle/Hunter Valley region.

As stated in our previous submission of 30 May 2019, Jaguar Land Rover Australia does not consider that the proposed acquisition will have any material impact on its business, nor is it likely to have any meaningful impact on owners or potential purchasers of Jaguar and Land Rover branded vehicles at the retail level anywhere in Australia, including in the Newcastle/Hunter Valley region, particular in circumstances where it is Jaguar Land Rover's experience that:

1. consumers are generally willing to shop around at dealerships located outside of their specific local area to secure the best price and service possible, particularly given the infrequent nature and the high value of the purchase in question; and

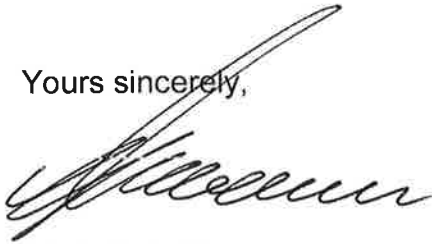
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2. individual dealerships within the same dealership groups generally compete as vigorously against one another for sales (and in respect of servicing) as they do against dealerships from outside of the group.

By way of further comment with respect to the concerns raised in relation to the Newcastle and Hunter Valley region, Jaguar Land Rover would think that potential purchasers in that area would be willing to travel the 80-150kms to the Central Coast and Sydney for a purchase of significance; are well used to travelling that distance routinely; and, with ready online information from dealer websites, carsales and other portals, detailed consumer information is readily available allowing them to do so in a targeted manner should they wish to shop around on price for a vehicle they may have seen in the local dealership.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mark Cameron', written in a cursive style.

Mark Cameron

Managing Director
Jaguar Land Rover Australia