



## **COMPETITION COMMISSION OF SOUTH AFRICA**

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In the matter of

### **ONLINE INTERMEDIATION PLATFORMS MARKET INQUIRY PUBLIC INQUIRY (OIPMI)**

held at

***DTI Building  
Sunnyside and virtually via MS TEAMS***

on

***5 November 2021***

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**PANEL:** *James Hodge – Chairperson  
And Doris Tshepe*

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#### **TECHNICAL TEAM**

*Itumeleng Lesofe*

*CCSA Internal Team*

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#### **COMPANY: SAFARI NOW**



**Gauteng Transcribers**  
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PROCEEDINGS ON 05 NOVEMBER 2021

CHAIRPERSON: Welcome, Tom. It is Tom Williams from SafariNow.

MR WILLIAMS: Hi. Nice to meet you.

CHAIRPERSON: Thank you very much for joining us on a Friday afternoon. As we are told that is not the most appropriate especially for the travel industry, but we appreciate that and I am just going to welcome you to the panel and my fellow panel member, Ms Tshepe, is going to  
10 just commence with some questions for you.

MR WILLIAMS: Sure.

MS TSHEPE: Good afternoon, Mr Williams, and welcome.

MR WILLIAMS: Hi, Ms Tshepe.

MS TSHEPE: Thank you so much for joining us. I just wanted to just chat to you. We have heard – we have spoken to some OTAs in South Africa in the past few days and I just wanted to just chat to you briefly for you to firstly tell us about SarafiNow and who you are, what kind of services you provide, but most importantly what your  
20 experience has been as an OTA competing with other international OTAs in the industry. Thank you.

MR WILLIAMS: Okay, sure. Okay, so I will just give you a very brief introduction to SafariNow. SafariNow, we started in 1999. So I think we were probably one of the first OTAs in South Africa and we started with only a few properties listed

on the site. And in the beginning the only way of really acquiring traffic was to partnership – do like partnerships with affiliates and media houses. So I think we partnered with Mweb or News24, one of those guys and through that we got about 30% of our traffic and we started generating bookings for these properties.

And that is really where it all started and, you know, we grew organically over the years. By organically I mean, you know, almost all of the properties that we acquired in the  
10 first 10 years were organic. So they came directly to us. You know, we did not have a sales team, we did not approach properties to list. And the properties ranged from self-catering to bed and breakfast, hotels, you know, across a full range of accommodation types. And that is pretty much how it started.

And, you know, the SEA was a big thing back then and we optimised the website for organic traffic. You know, every time we had a new property in a new location we created a special page for it and a special, you know,  
20 location theme and, you know, that was the sort of – the way you did it back then. And we managed to really take advantage of the growth of internet traffic in South Africa and SEA was a huge driver in growing our business and we became very reliant on that as a traffic source.

Over the years, you know, the landscape obviously

changed a lot as Google has become more aggressive and we have had to adapt to that. So today we have around 30 000 properties in Southern Africa on a direct connection. That is properties that have contracted directly with us. We also have about another 150 000 properties that we have contracted through a bed bank. So the relationship exists between the bed bank and the property, not between SafariNow and the property and we get properties through Hotelbeds and Expedia and those properties, you know,  
10 really supplements a lot of our property portfolio in South Africa, especially in the hotel sector.

So, you know, we offer a wide range of accommodation across for all budgets and we cover every destination in South Africa. So you can book hotels, self-catering, etcetera as I explained. You know, the market is incredibly fragmented and very much long tail. So by long tail I mean, you know, there is properties all over the place, not just around the large metros and in each destination we have got a pretty wide range of accommodation from budget  
20 to luxury.

So I guess SafariNow sits very much in the space of there is like a formal sector of the accommodation market which is the Booking.com type of properties and then there is more the informal sector which is the Airbnb type of property. And SafariNow like all the other local OTAs, you

know, has a mixture of both of the formal and informal sector.

Your question I guess about competing with international OTAs, you know, as SEA becomes less important and as Google monetises its search results page, you know, it has control over what uses click and back in, you know, 15 years ago SEA was the top of the page and slowly over the years that has been eroded. You know, Google started selling advertising. They sold to ads, then  
10 they sold for ads and then they inserted the Google Hotel Finder and what that really means is that you have got to pay to play. So if you do not have big budgets it is very difficult for you to get any coverage in Google Search.

And another massive factor which people do not really realise is, you know, the further down the page that your result appears, the lower the consumer trust in the click will be. So what that practically means is that the lower down the page you are on Google, the lower the trust in the click and as a result the lower the conversion on the site is  
20 and that is a pretty well documented fact. So for people entering the market it is very, very difficult to feature on Google at all.

So, yes, you know you can take part in Google Ads and Google has ads, but in terms of the international OTAs we are competing against the likes of Booking.com who is

the biggest spender and, you know, we just do not have enough budget to compete with guys like that. So it is really a fight for second or third or fourth place. So that is really the biggest challenge is in the acquisition of traffic and the acquisition of customers. It is getting increasingly more competitive and more difficult for local players.

MS TSHEPE: Just on that last part, I mean, you seem to be despite I think the difficulties with acquisition of customers or consumers is you seem to be expanding even just outside  
10 South Africa you seem to be, even in the broader African region and other areas. How has that been – how has that experience been for you?

MR WILLIAMS: Well, we actually expanded into sort of the neighbouring SADEC countries because that is easy for South Africans to travel to. You know, a lot of – most of our bookings are self drive, so it is great to go to Mozambique and, you know, Namibia and Botswana. And we did try many years ago to launch internationally and we did an integration with Priceline and we found it incredibly difficult and we just  
20 did not have the necessarily budget to compete in the traffic acquisition space, especially for, you know, in places like Europe where the cost – competition is super high and the cost of traffic is sort of out of our budget. So ja, it is incredibly difficult and we have not done that successfully.

MS TSHEPE: So, even the – just tapping into the SADEC

market, is it mainly with South African consumers, is that what you are saying?

MR WILLIAMS: Yes, so most of our customers are based in South Africa. We are 90% domestic brand.

MS TSHEPE: Okay.

CHAIRPERSON: Tom, I just want to ask in terms of I mean as I would understand the accommodation, I mean as you pointed out search is an important part of the channel of acquiring a customer, but I suppose your goal is to also build  
10 a brand over time and so people may start to move direct to SafariNow, let us say, and say, you know, there is some differentiating factor, there is some value add that SafariNow brings and that is your maybe longer term goal. And we have seen some of the travel companies obviously moving apps hoping to bypass the search and attract people straight into the app.

And I suppose it makes sense that you focussed on domestic because you probably invested in building a brand within the country. But within Southern Africa, I mean  
20 building that brand, does that require again going up on Google Search Engine marketing just to get the acquisition and build that almost repeat customer or build a customer group with branding on the side or how would it work if you were to develop a market outside of our borders?

MR WILLIAMS: I think, you know, the easiest way is if you

have got a big budget and you can acquire customers on Google and then, you know, you would retain those customers through your app or your marketing, you know, your direct marketing efforts.

Buying that to grow outside South Africa, I think you would have to have some partnerships with maybe the local tourism authorities for instance, you know, local media players in that region. [Indistinct 00:11:48] is a good way of doing it. I guess it depends on the country really and each  
10 country would have its own strategy and its own sort of levers that would work in acquiring customers. For instance, you could use Trivago to grow in South Africa, but in Nigeria I do not think Trivago is a channel that people use.

CHAIRPERSON: Alright and maybe, I mean, can you – you just mentioned Trivago, but explain your relationship with the metasearch engines? Because one gets a sense that they may – I mean, they are not doing the bookings, so they really, I suppose focus for customers on getting a rich  
20 advertising that your colleague talked about. So how does it work in your relationship with a Trivago for instance in you said customer acquisition?

MR WILLIAMS: So Trivago is just another acquisition channel like Google Search would be. There is also Google Hotel Ads as an acquisition channel. Tripadvisor for



instance is another one of those meta type channels and there is a couple, you know. There is Cheap Flights, there is Kayak internationally. Ja, so we are basically using those acquisition channels and, ja, nothing more than that. But Google is by far the primary channel, Google Search.

CHAIRPERSON: And so as an acquisition channel I assume you may pay them for a completed booking or a percentage fee or you might pay a cost per click through. How would it work?

10 MR WILLIAMS: Ja, exactly. So some of them have – they have varying models and the models go from a cost per click to a cost per acquisition. And I guess a cost per acquisition model is the lowest risk but the least control. So you know, you can pay 10% for instance of your booking value would go to the meta in the case there was a successful booking. If you are wanting to do a cost per click model it becomes a lot more resource intensive and you would have to have a better understanding of the market and the properties that are working.

20 So I guess it comes down to how much resource you have as a company to manage those channels and also how much knowledge you have of those platforms and for the customer bases that they feed.

CHAIRPERSON: And just on the – you talked about the evolution from search engine optimisation to I suppose

search engine marketing which is probably the way to sum it up. How has that changed the economics of your business? So just looking at your cost flow per acquisition, your commissions and your margins, so does it start to change your cost base? Do your commission start to change to adjust for that or is it just that your margins change? So if you have been around the block for a long while, just give us a sense of how your almost income statement shifts.

MR WILLIAMS: Ja, it was more fun in the past, that is for  
10 sure. So ja, obviously, you know, as you lose free traffic, you know organic traffic you have to start paying for traffic and as a result your cost per acquisition goes up. We have not played with our margins too much because, you know, it is a fairly standardised thing in South Africa, especially with the OTAs and in order to be competitive with each other we also need to maintain some sort of level of sort of parity with the margins.

We have tried in the past to push extra cost onto the customer to sort of compensation for the higher CPOs, but  
20 again, you know, customers are savvy and customers are getting used to shopping around now. You know, they will go through multiple brands, they will go to multiple OTAs looking for exactly the same property and they will make a decision based on price. I think, you know, it is good to have a great brand, but I do not think – I think at the end of

the day the customer will choose the brand that offers them the best deal at the moment.

CHAIRPERSON: So the evolution you have talked about is more about squeezing your margin if your commissions have stayed the same and your costs have increased. And as I would understand then also for a South African platform that now big players with big budgets have come in and that affects your ability to get I suppose do customer acquisition. Would that be... [intervenes]

10 MR WILLIAMS: Absolutely. Ja, that is 100%. You know, the guys with the big budgets, the big international guys have come into the market, they dominate the top positions. They push up the cost, the CPCs on the platforms and they make it very difficult for the smaller guys to get a share of that traffic. So it is much, much more difficult, much harder now.

CHAIRPERSON: And hence it would seem that I mean you talked about the long tail and I think we heard about the long tail yesterday from TripCo as well, but small establishments  
20 and I suppose find your niche in the South African market with the domestic consumer.

MR WILLIAMS: Ja, I mean that is the thing. The long tail used to be a hedge against sort of the big international OTAs, but you know with the bed banks and the distribution of inventory being so easy, it has become quite simple for

the players like the Booking.com for instance to have so many product portfolio all over the country in every single destination, which allows them then to bid in I guess the destinations or markets that were still quite niche. But that is also eroding over time.

CHAIRPERSON: And so I mean just looking forward over the next five years, how do you see this playing out and what do you think the commission should be doing in order to retain a sort of competitive space and support for South  
10 African platforms to compete in that?

MR WILLIAMS: Ja, I think it is a very difficult space to regulate and, ja, I do not – from our perspective, you know, we will continue to focus on being a good business and providing great service and reliable service and, you know, trying to bring the best prices to our customers and that way building up a retention strategy. You know, focussing more on a retention strategy as a longer term hedge. I do not know how you could regulate Google.

CHAIRPERSON: Well, I am sure we will be having those  
20 conversations during these hearings and over the next few months as to what needs to be done or whether anything needs to be done at all or could be done. But can I just ask you about the sort of – I mean, you mentioned earlier the sort of I suppose I do not know what you would call it, but channel management.

So within accommodation what we understand and I think within the Travelstart Group there is NightsBridge, but basically software that facilitates multi-listing on a number of platforms and that may be the source of the bed bank, I am not sure. But as I understand that has enabled accommodation providers to list quite easily on multiple platforms simultaneously and manage their inventory. I mean, maybe if you can if you are able to just give us an indication of what this is and how it works?

10 MR WILLIAMS: Sure. So I guess in a nutshell properties use channel managers to manage their inventory. If you are a small guesthouse with say four rooms it is very difficult to manage and to communicate the state of your availability and your pricing across all of these channels. You know, there is so many channels available now today.

And you know, channel managers solve this problem by creating a centralised platform where a property can store their rates and availability. OTAs for example can then query that channel manager in real time and once a room is  
20 booked through an OTA or a channel, the inventory is immediately marked as booked in real time. So what this does is it avoids the issues of double bookings and ultimately results in a better experience for the customer.

You know, it is impossible for an individual guesthouse to manage their rates and availability manually,

especially when you have got all of these different sources of booking channels coming in. Hotels have obviously been using these for a long time and, you know, when NightsBridge came in it created a fantastic solution for the local market, specifically catering towards the bed and breakfasts, the guesthouses and self-catering type of establishments and NightsBridge is now one of the leading channel managers.

10 And of course another massive benefit really is the distribution as you mentioned. NightsBridge for instance is already connected to many OTAs. So as soon as you are active on the NightsBridge platform you can very quickly be connected to all of the other distribution channels and this I guess really takes the headache away for a small property owner on how to market their property and how to generate bookings and how to, you know, do customer acquisition. Because it is literally impossible for them to compete on Google now and, you know, get one of those top spots next to Booking.com and Expedia.

20 And to be on Google Hotel Ads is also extremely difficult and quite – there is quite a technical barrier there that they would need to overcome. It is no simple case of just connecting. So basically, you know, Google's dominance of the first top two thirds of the page has made it really impossible for the small guys to enter the market

through Google and that is where NightsBridge is really an amazing opportunity for them to be able to list their property, connect to the existing distribution channels and OTAs and get their marketing done very quickly and easily.

CHAIRPERSON: Can you just elaborate on what the difficulty is linking to Google Hotels? Because we heard yesterday from Google that this actually is providing a lot of good opportunity for small businesses.

MR WILLIAMS: Well, all I can speak is from our experience  
10 of connecting our properties to Google Hotel Ads and it requires an API which had to be written by Ads which Google then pings regularly for your availability and rates and that needs to be kept up to date. It needs to be fast so there is not any latency or, you know, latency threshold is good enough for Google to use you. And then, you know, once you are in that space you have then got to bid of course to – you cannot just connect and get bookings. You have got to then pay for those bookings and you have got to bid. You have got to have an understanding of CPC. You have got to  
20 have an understanding of CPA, bid strategies and it is just it is not an easy thing for a small guesthouse or bed and breakfast to do by themselves. This is why those meta channels are dominated by OTAs.

CHAIRPERSON: Alright. Ja, I think certainly the impression we get is that when you are looking for the actual

rates on the hotel that often it is mostly the OTAs that sit there. I mean, the combination of NightsBridge and SafariNow, is that a vehicle for going into Southern Africa to connecting to small establishments that would not otherwise? Is that part of the sort of strategy?

MR WILLIAMS: It might – it may well be part of NightsBridge’s strategy, I am not sure. But you know, from SafariNow’s perspective we use NightsBridge for the real time inventory and that, you know, collates with our strategy  
10 of having as many real time bookable properties as we can on this platform and also allows us to distribute to the likes of Google, so. But ja, we not by no means are working with NightsBridge on a strategy for African expansion.

CHAIRPERSON: Can I just ask on ranking, because we had put in our further statement of issues that sponsored ranking on accommodation seems to be quite a feature. So it might be paying a higher commission to get a boost in the ranking or a featured listing or the like. I mean, is this something that is a feature of SafariNow?

20 MR WILLIAMS: No, not at all. I know that some of the international OTAs do that. I am not sure about the other guys locally, but SafariNow’s ranking is based very much on a high level concept of the look to book ratio, you know. So it is based on impressions and statistical relevance of the impressions versus the – the impressions to booking ratio



and that is it. So if you have great photographs and you generate bookings, you will do well on the platform.

CHAIRPERSON: And what is the reason for you not pursuing that route?

MR WILLIAMS: I guess it just never really resonated with us that concept. You know, we would rather have the best properties bubble to the top which would provide, you know, the ones that are most popular for customers. As a poor performing property who provides really bad customer  
10 service, you could – if you had a sponsored listing you could buy your way to the top I guess, which is not really the best customer experience at the end of the day.

CHAIRPERSON: And I mean, is it – because obviously that is a form of monetisation of the site as well and is it a necessary form of monetisation in the OTA space?

MR WILLIAMS: I do not think so. It depends on I guess what your financial goals are for that OTA. I mean, you know, we charge commissions on bookings that we generate which is the fairly standardised model. So ja, we have not  
20 considered that model at this stage, but I guess, you know, if you want to spend huge amounts of money on marketing and you need to make some extra margin, then that is probably a good way of doing it.

CHAIRPERSON: And what is your view on the consumer impact of that, if any?

MR WILLIAMS: I think the consumer is not getting the most relevant product for their search. I think that, you know, if you have sponsored listings and people are buying their way to the top of the rankings, you are compromising the result set that the consumer is getting based on the filters and their specific needs. So ja, I am not a fan of it.

CHAIRPERSON: Alright and just to get again your impressions, I mean it seems that at least in a number of platforms or OTAs these are labelled. Some of that is  
10 because of regulation in other countries, in Europe, but in others not. So just to get your sense of if it was to be permitted, should labelling be a part of that at least?

MR WILLIAMS: I do not have a strong opinion on that. Honestly either way I think that at the end of the day the customer experience on the site if they find what they are looking for and it is a sponsored listing, then I guess everyone is happy. Ja, I do not have a strong opinion. Of course, if it is a sponsored listing that is actually not a great property and the customer has a poor experience they will  
20 not come back and I think as a result that brand would eventually not do well.

CHAIRPERSON: Thanks, Tom. I am just going to check with the Technical Team whether they have any further questions.

MR LINLEY: Hi, Tom. Donnavan here. I just want to

explore whether SafariNow engages in any sort of pricing parity or restrictive pricing on business users or accommodation providers?

MR WILLIAMS: We always push for pricing parity of course. You know, that is what the best result is for the customer and through the bed banks like NightsBridge you very often do get pricing parity which is great. Unfortunately because the market is so fragmented, especially in the informal sector, a lot of the small business and long tail guesthouses  
10 or self-catering do not believe in price parity and they – you know, they will always try and get customers to book directly with them and their sort of leverage there is that they will use the commission as – not as a discount to the customer, but as a premium. So in some cases they may charge an extra amount for customers to book with them.

But I really think that is probably a lack of education in the market and over time I think that will disappear as it becomes more acceptable, you know, to pay OTAs as a marketing fee or a commission however you want to see it.  
20 But ja, as a general rule pricing parity is the fairest price for us.

We do not do any strange things with pricing like Booking.com do. They often will mark down the listed price that they have on the property by up to 30% and they will do that sort of as a last leader to – as a strategy to get clicks.

And we have had a couple of cases where we have identified this and reached out to the property owners and they have confirmed that the price that Booking.com is selling at is not the price which they are advertising it.

So I guess these guys do play around with pricing. We do offer special deals from time to time, but ja, that is really most of the special deals come directly from the properties. The only way we would manipulate pricing I guess is if we added or gave customers a voucher to redeem  
10 or a discount in the form of a voucher or code.

CHAIRPERSON: Sorry, Donnavan, I will take over unless you have any other questions. Oh, alright, we will cover that. Sorry, Tom, I just wanted – a question actually I had yesterday I was just reminded, I mean it is easy to list on 10 platforms but the question and the question we had for an accommodation provider this morning is, I mean, the accommodation providers are not going to put the effort equally into all 10.

So they may list because if you pick up a booking  
20 here or there, great, but I would imagine, and I may be wrong and this is why I am asking you, is accommodation providers must decide where they put some effort into the relationship in order to secure more bookings. And so I mean from your perspective as a platform rather than the accommodation provider which we had this morning, I mean

how do you seek to get engagement from some of the properties that list for you and how do you see the behaviour of those accommodation providers across different platforms and their strategies?

MR WILLIAMS: I guess, you know, we provide a platform where it is very easy for accommodation providers to manage their inventory, manage their rates, manage their contents and their photographs and to add special deals. I mean, we continuously try to harvest special deals from  
10 these guys. And you know, we support that sort of engagement, especially with specials by, you know, spending – sending out regular emails to our customer base, showcasing these guys and their properties.

But beyond that there is not much that we can do actively. And ja, I mean on other platforms I guess, you know, with the bigger groups like the one this morning you could do some negotiation. You could have maybe some special deals maybe that are running exclusively for that platform. Ja, I am not sure how the other OTAs are  
20 managing that strategy.

CHAIRPERSON: And can I just ask, the special deals, I mean how does parity sit with special deals? Because as we understood parity it is the same price across platforms and that is a sort of wider parity. So if you are running a special deal, would that not put them foul of those clauses?

MR WILLIAMS: Well, the special deal would not be an exclusive special deal. So they could put it on SafariNow it would be a special deal, but they obviously – that special deal could be loaded on all of the other platforms too. So whether or not they decide to push it to those other platforms I guess is up to the accommodation provider.

NightsBridge does it very well. In fact, you know, people will load a special on NightsBridge, it will then get distributed across all of the connections that they have. So I  
10 guess that is one way of enforcing price parities by, you know, erring towards channel managers as a first port of call.

CHAIRPERSON: And what was interesting that the accommodation provider raised was his view was he did not like price parity because he felt different channels may be targeted at different groups of people or different target markets and therefore the ability to price differently across the channels maybe meant you could in fact use different pricing tools to I suppose optimise their load factors in the  
20 hotel. So if it is a more price sensitive maybe domestic consumer you could discount it as opposed to foreign consumer. I mean, what is your view on that?

MR WILLIAMS: I think you are talking about dynamic pricing and, you know, I know that a lot of the international OTAs do that quite often. If you are on an iPhone they will

probably charge you a premium and, you know, you can – we tested this last year actually a couple of times and it is quite interesting. You know, you can look at a price and then an hour later it is a different price and, you know, if it is a short lead time to booking they might charge a higher price. Ja and I do not, you know, conceptually have any problem with that. I think it is going to become a fairly standardised thing. Whether or not it is right or wrong, I do not know.

CHAIRPERSON: And would – I mean, the world of dynamic  
10 pricing, price parity seems quite tough to align.

MR WILLIAMS: Ja, absolutely. I mean, the price parity is fantastic because it is a level playing field for everybody. But ja, I guess maybe it is a – ja, maybe it is an idealistic view on the way the world is going. I think everybody is different and consumers are different and I think if the customers feel they are getting the best deal, that suits them at that moment, but the brand that they are affiliated with and they are happy to pay extra or then I guess it is okay.

MS TSHEPE: Thanks, Tom. I just want to just discuss with  
20 you just on price parity and whether in fact it works for the consumer. If you as an OTA are charging a lower commission than an international OTA for example, why should a hotel accommodation or an accommodation provider not have the capacity to charge a consumer less, providing it on an OTA that is charging a lesser commission

as opposed to an OTA that charges a higher commission, so feeding that into the pricing for a consumer for the benefit of the consumer obviously?

MR WILLIAMS: I mean, the commissions usually come out of the rack rate. So you know, the rack rate is the rate that a guesthouse would sell their room at and that is the rate that we would display. Other OTAs may have higher commissions or lower commissions based on the volume and their specific agreements, but you know, the guesthouses  
10 and bed and breakfasts do not want a channel selling at a cheaper price than a direct price. So, you know, that is especially with the big hotels you cannot sell a hotel room cheaper on an OTA site than from the hotel direct.

So I think conceptually, ja, sure you could. You could if you have a 30% margin you could charge 20% commission and give the 10% back to the consumer, but at the end of the day you will probably ruin your relationship with the accommodation provider because you will be contravening, you know, their rules.

20 MS TSHEPE: Thank you, Tom. That is my problem. My problem with that is it sounds that it then is relationship as between the service provider and not necessarily for the benefit of the consumer and that is why I am asking. If the input cost is lower, should not the consumer then have the benefit of that as opposed to just blanketly agreeing to not



charge differently across all channels.

MR WILLIAMS: Sure, ja, that will be great. That will be great for the customer.

CHAIRPERSON: Tom, is there anything else you wish to sort of raise with the panel or think we should be aware of that we have not traversed already today?

MR WILLIAMS: No, nothing really from my side. Thanks for the opportunity to speak and, ja, I mean it is – I would be interested to get some insight on what your outcome of this  
10 process would be and what your guys sort of ideal outcome would be here, because it has been quite a long hearing and, you know, obviously you get lots of information. I am just interested.

CHAIRPERSON: Ja, so I mean just to give you an idea of the process that we have been collecting information as you are well aware, as we have asked for information from SafariNow as well and that has helped shape some of the issues and that further statement of issues is on our website, on the Commission's website and you can go to the inquiry  
20 page on that.

The purpose of this hearing is to exactly just have some of that discussion with the players around those issues and see if there is other things that we are not picking up that we should be aware of. The goal is to produce a preliminary report by April/May next year and so we will be

having further let us say in-camera or confidential sessions with some players who want that where they do not want to be – there is information they want to bring to our attention that is not in the public domain and is a company secret.

So we will have those sessions and that preliminary report will put out our preliminary findings on competition and also the public interest elements that are part of the Act and our preliminary recommendations as to what could be done to address any issues we identify. But the  
10 recommendations are really based on whether we identify something that needs to be corrected.

And then that will go into the public domain as it should for further consultations and inputs before a final report comes out. So as a public institution we are bound to a transparent and consultative process. So that is it. But we aim to wrap this up in less than a year.

MR WILLIAMS: Okay, great. Thanks. Thanks for sharing.

CHAIRPERSON: And when we do release that report we will certainly bring it to your attention and get your  
20 perspectives on what our thinking is at that stage.

MR WILLIAMS: Well, thank you.

CHAIRPERSON: Thank you, Tom, and thank you, SafariNow, for making the time and I also wish you luck now that hopefully the travel industry will get a boost and hopefully the bad days of COVID at least we are seeing it

turn a corner and I hope the industry starts to recover. But we wish you all well for the December holidays. And for the public that brings to a close the first week of our public hearings and we resume on Tuesday next week looking at the ecommerce platforms and I think our first participant is Bidorbuy, but you can join us then at 10:00 on Tuesday morning. And that is a wrap for the week. Thank you.

INQUIRY ADJOURNS TO 09 NOVEMBER 2021

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**FORUM DATE:** 2021-11-05  
**ORDER TO TRANSCRIBE:** Transcribe soundtrack as per order  
**TRANSCRIBER:** F Cremore  
**SOUNDTRACK:** Date and Time received: 2021-11-05  
**DATE COMPLETED:** 2021-11-07  
**INFORMATION:** WeTransfer

**PLEASE NOTE:**

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1. Parties sometimes unclear, therefore the "indistinct"
  2. Parties intervening each other may result in indistinct words and or phrases.

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