

THE COMPETITION TRIBUNAL

IN THE MATTER OF the *Competition Act*, R.S.C. 1985, c. C-34, as amended;

AND IN THE MATTER OF certain conduct of Vancouver Airport Authority relating to the supply of in-flight catering at Vancouver International Airport;

AND IN THE MATTER OF an application by the Commissioner of Competition for one or more orders pursuant to section 79 of the *Competition Act*.

BETWEEN:

COMPETITION TRIBUNAL
TRIBUNAL DE LA CONCURRENCE

FILED / PRODUIT

Date: May 12, 2016
CT-2016-015

Andrée Bernier for / pour
REGISTRAR / REGISTRARE

OTTAWA, ONT.

81

COMMISSIONER OF COMPETITION

Applicant

—and—

Date:

VANCOUVER AIRPORT AUTHORITY

Respondent

MOTION RECORD OF VANCOUVER AIRPORT AUTHORITY

(Respondent's Motion Challenging Adequacy and Accuracy of Summaries)

May 10, 2017

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CT-2016-015

THE COMPETITION TRIBUNAL**IN THE MATTER OF** the *Competition Act*, R.S.C. 1985, c. C-34, as amended;**AND IN THE MATTER OF** certain conduct of Vancouver Airport Authority relating to the supply of in-flight catering at Vancouver International Airport;**AND IN THE MATTER OF** an application by the Commissioner of Competition for one or more orders pursuant to section 79 of the *Competition Act*.**BETWEEN:****COMMISSIONER OF COMPETITION****Applicant**

—and—

VANCOUVER AIRPORT AUTHORITY**Respondent**

NOTICE OF MOTION*(Respondent's Motion Challenging Adequacy and Accuracy of Summaries)*

TAKE NOTICE that the Respondent, Vancouver Airport Authority (“VAA”), will make a motion on June 7, 2017, to a judicial member of the Competition Tribunal who is not sitting on the panel that will eventually hear the within application, pursuant to the Direction to Counsel of Mr. Justice Gascon, dated May 8, 2017. The estimated duration of the motion is one day.

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THIS MOTION IS FOR:

1. an Order requiring the Applicant, the Commissioner of Competition (the “Commissioner”), to produce to VAA complete, adequate and accurate summaries of those documents that the Commissioner has refused to produce on the basis of an asserted public interest privilege;
2. VAA’s costs of this motion; and
3. such further and other relief as the Tribunal deems just.

THE GROUNDS FOR THE MOTION ARE:

The Proceedings

1. The Commissioner began this proceeding by Notice of Application, dated September 29, 2016, seeking relief against VAA pursuant to section 79 of the *Act*.
2. Broadly speaking, the proceeding relates to VAA’s decision to permit only two in-flight catering service providers to operate on-site at the Vancouver International Airport (the “Airport”). The Commissioner’s application is based upon, among other things, allegations that VAA controls the market for “Galley Handling” at the Airport, that it acted with an anti-competitive purpose, and that the effect of its policy decision was a “substantial prevention or lessening of competition”, resulting in “higher prices, dampened innovation and lower service quality”.

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3. VAA is statutorily mandated to operate the Airport in a safe and efficient manner, to generate economic development for Vancouver and, more broadly, for British Columbia and the rest of Canada.
4. VAA delivered its Response on or about November 14, 2016. Among other things, VAA asserts that, given the small (and declining) market for in-flight catering of fresh meals, the entry of additional catering firms would imperil the continued viability of the operations of the two existing catering firms at the Airport, thereby adversely affecting VAA's ability to attract and retain flights in furtherance of its public interest mandate.
5. VAA further pleads that the Airport's ability to ensure the availability of a competitive choice of freshly prepared meals is very important to its efforts to attract new airlines and routes and retain existing flights and routes at the Airport. VAA also denies that it substantially controls the relevant market (which it states is broader than the Airport, owing to the fact that airlines can meet their "Galley Handling" needs through self-supply or double catering) and also denies that its conduct has substantially lessened or prevented competition.
6. VAA's pleading also includes the following allegations:
 - (a) the ability of airlines to self-supply, including by ferrying food and snacks from other airports, effectively limits the ability of the existing catering firms from imposing a significant, non-transitory increase in prices;
 - (b) VAA denies that such self-supply is (as asserted by the Commissioner) not "feasible or preferable" for most airlines in Canada; and

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- (c) given the unique ground access issues at YVR and the importance of fresh food being provided to aircraft on a timely basis, and given that flight manifests are subject to last-minute changes, it is not desirable for catering services to be located off-airport.

7. All of the foregoing allegations are denied by the Commissioner.

The Commissioner's Affidavit of Documents and Assertion of Public Interest Privilege

8. On or about February 15, 2017, the Commissioner delivered his Affidavit of Documents, which purported to list all of the documents relevant to the matters in issue in this Application that were in the possession, power or control of the Commissioner as at December 31, 2016. Attached to the Affidavit of Documents were three Schedules: Schedule A, comprising relevant documents in the Commissioner's possession or control that do not contain confidential information and over which the Commissioner does not claim privilege; Schedule B, comprising relevant documents in the Commissioner's possession or control that the Commissioner is willing to produce (as the Commissioner is not claiming privilege in respect thereof) but that the Commissioner asserts contain confidential information; and Schedule C, comprising relevant documents in the Commissioner's possession or control in respect of which the Commissioner claims privilege.
9. The Commissioner's February Affidavit of Documents listed approximately 10,000 documents in Schedule C, in respect of which the Commissioner claimed privilege and which the Commissioner accordingly objected to producing.

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10. Approximately five weeks later, on or about March 21, 2017, the Commissioner delivered an Amended Affidavit of Documents. The Amended Affidavit does not list any new documents additional to those listed in the February Affidavit. Rather, it reflects the Commissioner's decision to waive privilege over approximately 8500 documents.

11. Virtually all of the 8500 documents produced by the Commissioner pursuant to this waiver of privilege comprise:

- (a) price lists, invoices and related documents (approximately 7700 documents);
- (b) flight schedules for various Canadian airports (approximately 150 documents); and
- (c) financial documents, including profit and loss statements and forecasts, of various in-flight caterers (approximately 600 documents).

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12. The Commissioner continues to assert public interest privilege over approximately 1200 documents. Those 1200 withheld documents include every single relevant memorandum, interview note, presentation, affidavit, note, letter and virtually every relevant email in the Commissioner's possession, as set out in the following chart.

| Type of Document | Number Withheld on the Basis of Public Interest Privilege | Number Produced by the Commissioner |
|------------------|---|-------------------------------------|
| Affidavit | 13 | 0 |
| Email | 230 | 18 |
| Interview Notes | 65 | 0 |
| Letters | 35 | 0 |
| Memoranda | 45 | 0 |
| Notebooks | 65 | 0 |
| Presentation | 25 | 0 |

13. In other words, despite the fact that the Commissioner has in excess of 475 affidavits, emails, interview notes, letters, memos, notebooks and presentations, the Commissioner has withheld virtually all such documents on the basis of public interest privilege.

The Summaries Produced by the Commissioner

14. On or about April 13, 2017, the Commissioner produced a "Summary of Third Party Information". The summary was divided into two documents. The first contains information which the Commissioner claims as Level A pursuant to the Confidentiality Order. The second contains information which the Commissioner claims as Level B pursuant to the Confidentiality Order.

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15. Together, the two documents purport to be a summary of relevant information learned by the Commissioner from third parties, including relevant information contained in the documents which the Commissioner is withholding from production on the basis of public interest privilege.

16. The two documents (referred to hereinafter as the "Summaries") comprise thousands of snippets of information, provided in a jumbled, non-linear manner, wholly divorced from context, in such a way as to render their content essentially meaningless and uninformative.

17. The Summaries do not convey to the Respondent the facts that have been gathered by the Commissioner. They will not permit the Respondent to conduct an efficient and meaningful examination for discovery of the Commissioner's representative. They will not permit the Respondent to know the case it has to meet. And they will, accordingly, frustrate effective pre-trial preparation.

18. As a result, the Summaries do not meet the requirements set out in the jurisprudence. They are inadequate and deficient and do not fulfill their intended function as a safeguard mechanism to counterbalance the unfairness that would otherwise be the result of the Commissioner's assertion of public interest privilege – a safeguard mechanism that the Tribunal has repeatedly recognized as necessary to temper the adverse impact on the search for truth and on the Respondent's right to a fair hearing that the limited disclosure and the high threshold (e.g., compelling circumstances or compelling competing interest) required to authorize lifting public interest privilege would otherwise have.

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19. Without summaries that properly serve their intended safeguard function, the Commissioner's assertion of public interest privilege produces a result that is inconsistent with the high level of procedural fairness which is required in proceedings before the Tribunal.

20. All of the foregoing is subject to the Respondent's primary position (as asserted on the motion that was argued on March 22, 2017 that was disposed of by Reasons for Order and Order of Gascon J. on April 24, 2017, in respect of which a Notice of Appeal was issued on May 4, 2017) that the public interest privilege as asserted by the Commissioner should not be recognized by the Tribunal. In addition, all of the foregoing is without prejudice to the Respondent's right to bring a motion at a later date seeking to lift the privilege on the basis of compelling circumstances or a compelling competing interest. The Respondent reserves all of its rights in that regard.

21. Such further and other grounds as counsel may advise.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the motion:

- (a) affidavit of Monique Allen, sworn May 10, 2017;
- (b) the Amended Affidavit of Documents of the Commissioner of Competition, affirmed March 21, 2017;
- (c) Summary of Third Party Information – Confidential – Level A, dated April 13, 2017;
- (d) Summary of Third Party Information – Confidential – Level B, dated April 13, 2017;

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- (e) the Supplemental Affidavit of Documents of the Commissioner of Competition, affirmed April 27, 2017;
- (f) the pleadings and proceedings herein; and
- (g) such further and other evidence as counsel may advise and the Tribunal may permit.

DATED at Toronto, Ontario this 10th day of May, 2017


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CT-2016-015

THE COMPETITION TRIBUNAL

IN THE MATTER OF the *Competition Act*, R.S.C. 1985, c. C-34, as amended;

AND IN THE MATTER OF certain conduct of Vancouver Airport Authority relating to the supply of in-flight catering at Vancouver International Airport;

AND IN THE MATTER OF an application by the Commissioner of Competition for one or more orders pursuant to section 79 of the *Competition Act*.

BETWEEN:

COMMISSIONER OF COMPETITION

Applicant

—and—

VANCOUVER AIRPORT AUTHORITY

Respondent

AFFIDAVIT OF MONIQUE ALLEN

(Sworn May 10, 2017)

I, Monique Allen, of the City of Toronto, in the Province of Ontario, **MAKE OATH AND SAY AS FOLLOWS:**

1. I am a law clerk employed by the firm Goodmans LLP, lawyers for the Vancouver Airport Authority, the Respondent in this matter, and as such have knowledge of the matters to which I depose in this affidavit.

2. I have attached as Exhibit "A" a USB Key containing all of the documents (in either PDF form, MS Excel form or in Access Database form) produced in this proceeding by the Applicant, the Commissioner of Competition, identified by the "Doc Id" number assigned to the documents by the Applicant.

SWORN BEFORE ME
at the City of Toronto,
on May 10, 2017.



Commissioner for taking affidavits



Monique Allen

A

The document at this Tab 2A is confidential and was removed from the Public Version of this Motion Record pursuant to the Confidentiality Order of Justice Gascon dated March 20, 2017.

3

CT-2016-15

FEDERAL COURT

IN THE MATTER OF the *Competition Act*, R.S.C. 1985, c. C-34, as amended;

AND IN THE MATTER OF certain conduct of Vancouver Airport Authority relating to the supply of in-flight catering at Vancouver International Airport;

AND IN THE MATTER OF an application by the Commissioner of Competition for one or more orders pursuant to section 79 of the *Competition Act*.

BETWEEN:

COMMISSIONER OF COMPETITION

Applicant

– and –

VANCOUVER AIRPORT AUTHORITY

Respondent

**AMENDED AFFIDAVIT OF DOCUMENTS OF THE
COMMISSIONER OF COMPETITION
AFFIRMED 21 MARCH 2017**

I, **KEVIN RUSHTON**, of the Town of Carleton Place, in the Province of Ontario, solemnly affirm that:

1. I am Acting Major Case Director and Strategic Policy Advisor with the Competition Bureau. I am an authorized representative of the Commissioner of Competition (the "**Commissioner**") for the purpose of this affidavit.
2. I have participated in and overseen a review of the Commissioner's potentially relevant records and have made appropriate inquiries of others to inform myself in order to make this affidavit.
3. On 15 February 2017, the Affidavit of Documents of the Commissioner of Competition affirmed 14 February 2017 (the "**Commissioner's Affidavit**") was served on the Respondent, Vancouver Airport Authority.
4. Paragraph 7 of the Commissioner's Affidavit stated that at the time the Commissioner's Affidavit was affirmed, a confidentiality or protective order had not been put in place by the Competition Tribunal in respect of this Application, and that, as such, certain records that the Commissioner may otherwise have listed in Schedule B to the Commissioner's Affidavit were instead listed in Schedule C to the Commissioner's Affidavit. Schedule B to the Commissioner's Affidavit listed confidential but non-privileged records or records over which privilege has been waived, while Schedule C to the Commissioner's Affidavit listed confidential and privileged records.
5. Paragraph 7 of the Commissioner's Affidavit also stated that at such time as the Competition Tribunal has put in place a confidentiality order in respect of this Application, the Commissioner may provide a supplemental Affidavit of Documents that may de-list certain records

from Schedule C to the Commissioner's Affidavit and list those records in Schedule B to the Commissioner's Affidavit.

6. On 20 March 2017, the Competition Tribunal issued a confidentiality order in respect of the Application. The Commissioner has therefore elected to waive privilege for the purpose of this Application over 8,513 of the records that were listed in Schedule C to the Commissioner's Affidavit.
7. Accordingly, I have attached to this affidavit **Schedule B – AMENDED**, which contains an amended list of those relevant records that were in the Commissioner's possession, power or control that contain confidential information and for which no privilege is claimed or for which the Commissioner waives privilege for the purpose of this Application. Records highlighted in yellow in Schedule B – AMENDED were previously included in Schedule C to the Commissioner's Affidavit.
8. Certain records in Schedule B – AMENDED were previously designated as "Confidential – Level A", but have been re-designated as "Confidential – Level B". For ease of reference, these records have been highlighted in green.
9. In addition, I have attached to this affidavit **Schedule C – AMENDED**, which contains an amended list of those relevant records that were in the Commissioner's possession, power or control that contain confidential information and for which, at this time, privilege is claimed by the Commissioner, including the grounds for each such claim. For ease of reference, I have also attached **Schedule C – REDLINE**, which highlights in yellow those records that were previously included in Schedule C to the Commissioner's Affidavit but which have been

removed from Schedule C – AMENDED because such records are now listed in Schedule B – AMENDED.

AFFIRMED BEFORE ME at the City of Gatineau in the Province of Québec this 21st day of March 2017.


58143I
A Commissioner for Taking Oaths


Kevin Rushton

B

The document at this Tab 3B is confidential and was removed from the Public Version of this Motion Record pursuant to the Confidentiality Order of Justice Gascon dated March 20, 2017.

C

Commissioner of Competition v. Vancouver Airport Authority
 Affidavit of Documents of the Commissioner of Competition
 Schedule C - AMENDED

Schedule C - Amended
 THIS IS EXHIBIT TO THE
 AFFIDAVIT OF E. Ruston

SWORN BEFORE ME THIS 21 DAY
 OF March 20 17

L. Russell
 COMMISSIONER FOR OATHS

In this Schedule:

"Solicitor Client" means solicitor-client privilege; the privilege attaching to records that constitute, contain, record or reflect confidential communications passing between a client, or an expert retained by or on behalf of a client, and the client's solicitors, where the communications were made in the course of obtaining or providing legal advice and the solicitors were acting in a professional capacity as solicitors

"Litigation" means litigation privilege; the privilege attaching to:
 (i) records of any kind or description and copies thereof prepared for the purpose of asking for or receiving advice concerning pending or reasonably anticipated litigation;
 (ii) records of any kind or description and copies thereof prepared for the purpose of obtaining or providing information or evidence to be used in pending or reasonably anticipated litigation; and
 (iii) records of any kind or description and copies thereof prepared for the purpose of preparing for or prosecuting pending or reasonably anticipated litigation

"Public Interest" means public interest privilege; the privilege attaching to records of any kind or description and copies thereof, including records to which the confidentiality provisions of the Competition Act apply, created or obtained by the Applicant, its employees, servants, agents or solicitors, or obtained from third parties during the Applicant's investigations

| Count | Document Type | Main Date | Title | People/Organizations From | People/Organizations To | People/Organizations CC | People/Organizations Between | People/Organizations Author | Privilege |
|-------|-----------------|-----------|----------------------------------|---------------------------|-------------------------|-------------------------|------------------------------|-----------------------------|-----------------|
| 1 | Affidavit | 6/25/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 2 | Email | 2/24/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 3 | Email | 2/24/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 4 | Email | 2/24/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 5 | Email | 2/24/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 6 | Email | 5/9/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 7 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 8 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 9 | Agreement | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 10 | Agreement | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 11 | Agreement | 1/1/1900 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 12 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 13 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 14 | Agreement | 1/1/1900 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 15 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 16 | Email | 5/7/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 17 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 18 | Business Record | 1/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 19 | Business Record | 5/7/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 20 | Business Record | 4/30/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 21 | Business Record | 4/28/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 22 | Agreement | 1/1/1900 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 23 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 24 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 25 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 26 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 27 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 28 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |

| Count | Document Type | Main Date | Title | People/Organizations From | People/Organizations To | People/Organizations CC | People/Organizations Between | People/Organizations Author | Privilege |
|-------|-----------------|------------|----------------------------------|---------------------------|-------------------------|-------------------------|------------------------------|-----------------------------|-----------------|
| 29 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 30 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 31 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 32 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 33 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 34 | Email | 5/7/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 35 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
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| 37 | Business Record | 4/30/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
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| 42 | Business Record | 4/30/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 43 | Business Record | 4/30/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 44 | Business Record | 4/30/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 45 | Business Record | 4/30/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 46 | Letter | 5/8/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 47 | Email | 5/27/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 48 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 49 | Email | 6/2/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 50 | Email | 6/24/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 51 | Email | 12/18/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 52 | Letter | 12/18/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 53 | Email | 9/16/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 54 | Email | 10/14/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 55 | Email | 12/9/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 56 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 57 | Email | 1/6/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 58 | Email | 11/6/2013 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 59 | Email | 11/14/2013 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 60 | Email | 10/27/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 61 | Letter | 10/16/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 62 | Email | 5/14/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 63 | Email | 7/7/2014 | Record Received from Third Party | Third Party | | Third Party | | | Public Interest |
| 64 | Business Record | 7/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
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| 75 | Business Record | 7/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 76 | Email | 7/7/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 77 | Business Record | 7/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 78 | Email | 7/7/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 79 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 80 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |

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| 81 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
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| 88 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 89 | Agreement | 1/1/1900 | Record Received from Third Party | | | | Third Party | | Public Interest |
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| 94 | Agreement | 1/1/1900 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 95 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 96 | Agreement | 4/1/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 97 | Email | 7/7/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 98 | Business Record | 8/7/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 99 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 100 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 101 | Business Record | 9/20/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 102 | Email | 7/7/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 103 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 104 | Financial_Records | 9/30/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 105 | Email | 7/7/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 106 | Business Record | 4/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 107 | Email | 10/14/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 108 | Email | 11/16/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 109 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 110 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 111 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 112 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 113 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 114 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 115 | Email | 11/18/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 116 | Business Record | 1/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 117 | Business Record | 1/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 118 | Business Record | 1/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 119 | Email | 11/18/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 120 | Business Record | 4/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 121 | Business Record | 11/10/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 122 | Business Record | 11/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 123 | Email | 11/19/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 124 | Email | 12/18/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 125 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 126 | Email | 1/23/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 127 | Business Record | 1/1/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 128 | Email | 4/28/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 129 | Email | 5/13/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 130 | Email | 5/14/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 131 | Email | 7/8/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 132 | Email | 7/28/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |

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| 133 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 134 | Business Record | 10/27/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 135 | Business Record | 6/12/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 136 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 137 | Business Record | 3/11/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 138 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 139 | Business Record | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 140 | Agreement | 12/1/2014 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 141 | Email | 5/6/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 142 | Agreement | 1/1/1900 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 143 | Agreement | 10/27/2014 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 144 | Email | 3/2/2015 | Record Received from Third Party | Third Party | | Rushton, Kevin / Competition Bureau | | | Public Interest |
| 145 | Letter | 2/25/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 146 | Agreement | 4/1/2009 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 147 | Agreement | 4/1/2014 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 148 | Agreement | 3/1/2010 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 149 | Financia_Records | 9/30/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 150 | Financia_Records | 9/30/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 151 | Financia_Records | 9/30/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 152 | Financia_Records | 9/30/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 153 | Financia_Records | 9/30/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 154 | Financia_Records | 9/30/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 155 | Financia_Records | 9/30/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 156 | Email | 3/7/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 157 | Extracted Image | 1/1/1900 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 158 | Email | 3/7/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 159 | Email | 3/7/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 160 | Email | 3/7/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 161 | Email | 3/7/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 162 | Business Record | 2/28/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 163 | Financia_Records | 9/30/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 164 | Financia_Records | 9/30/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 165 | Financia_Records | 9/30/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 166 | Email | 9/18/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 167 | Business Record | 9/18/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 168 | Email | 12/13/2013 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 169 | Board Document | 6/20/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 170 | Corporate_Information | 6/9/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 171 | Presentation | 2/27/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 172 | Presentation | 2/27/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 173 | Email | 11/15/2013 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 174 | Business Record | 4/13/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 175 | Email | 2/21/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 176 | Agreement | 2/21/2014 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 177 | Email | 2/6/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 178 | Business Record | 2/6/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 179 | Business Record | 4/7/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 180 | Business Record | 4/7/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 181 | Business Record | 5/7/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 182 | Business Record | 5/22/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 183 | Business Record | 4/2/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 184 | Business Record | 5/13/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |

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| 185 | Business Record | 5/7/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 186 | Business Record | 4/2/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 187 | Business Record | 5/19/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 188 | Business Record | 4/7/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 189 | Business Record | 3/20/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 190 | Business Record | 3/20/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 191 | Business Record | 3/20/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 192 | Business Record | 3/20/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 193 | Business Record | 3/20/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 194 | Business Record | 3/20/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 195 | Business Record | 3/20/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 196 | Presentation | 5/12/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 197 | Business Record | 3/23/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 198 | Business Record | 3/23/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 199 | Business Record | 3/23/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 200 | Business Record | 3/12/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 201 | Business Record | 3/12/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 202 | Business Record | 3/12/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 203 | Business Record | 3/12/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 204 | Business Record | 3/12/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 205 | Business Record | 3/12/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 206 | Business Record | 3/12/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 207 | Business Record | 3/20/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 208 | Email | 6/10/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 209 | Business Record | 3/30/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 210 | Business Record | 3/30/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 211 | Business Record | 12/30/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 212 | Business Record | 3/24/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 213 | Business Record | 3/3/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 214 | Business Record | 3/30/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 215 | Email | 6/23/2015 | Record Received from Third Party | Third Party | Rushton, Kevin / Competition Bureau | Third Party | | | Public Interest |
| 216 | Letter | 6/18/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 217 | Email | 7/1/2015 | Record Received from Third Party | Third Party | Rushton, Kevin / Competition Bureau | Third Party | | | Public Interest |
| 218 | Email | 6/29/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 219 | Email | 10/8/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 220 | Email | 8/31/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 221 | Corporate_Information | 6/9/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 222 | Financia_Records | 9/30/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 223 | Financia_Records | 9/30/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 224 | Financia_Records | 9/30/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 225 | Financia_Records | 9/30/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 226 | Financia_Records | 9/30/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 227 | Financia_Records | 9/30/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 228 | Financia_Records | 9/30/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 229 | Financia_Records | 9/30/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 230 | Financia_Records | 9/30/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 231 | Email | 6/15/2016 | Record Received from Third Party | Third Party | Rushton, Kevin / Competition Bureau | | | | Public Interest |
| 232 | Email | 3/31/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 233 | Email | 6/8/2016 | Record Received from Third Party | Third Party | Rushton, Kevin / Competition Bureau | | | | Public Interest |
| 234 | Presentation | 4/28/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 235 | Presentation | 4/8/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 236 | Presentation | 4/8/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |

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| 237 | Invoice | 8/20/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 238 | Invoice | 8/20/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 239 | Invoice | 8/20/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 240 | Invoice | 8/20/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 241 | Email | 7/9/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 242 | Letter | | Record Received from Third Party | Third Party | Vancouver Airport Authority | | | | Public Interest |
| 243 | Letter | 7/18/2016 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 244 | Business Record | 4/15/2016 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 245 | Letter | | Record Received from Third Party | Vancouver Airport Authority | Third Party | | | | Public Interest |
| 246 | Letter | | Record Received from Third Party | Third Party | Vancouver Airport Authority | | | | Public Interest |
| 247 | Letter | 12/17/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 248 | Notebook | 1/6/2015 | Competition Bureau Record | | | | | Alexander, Beth / Competition Bureau | Public Interest |
| 249 | Notebook | 3/11/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 250 | Notebook | 5/26/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 251 | Notebook | 5/28/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 252 | Notebook | 5/29/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 253 | Notebook | 6/1/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 254 | Notebook | 6/3/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 255 | Notebook | 6/4/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 256 | Notebook | 6/5/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 257 | Notebook | 6/5/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 258 | Notebook | 6/9/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 259 | Notebook | 6/16/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 260 | Notebook | 1/7/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 261 | Notebook | 1/7/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 262 | Notebook | 1/8/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 263 | Notebook | 1/9/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 264 | Notebook | 1/14/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 265 | Notebook | 2/3/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 266 | Notebook | 10/27/2014 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 267 | Notebook | 12/18/2014 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 268 | Notebook | 1/7/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 269 | Notebook | 1/30/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 270 | Notebook | 3/11/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 271 | Notebook | 5/28/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 272 | Notebook | 6/12/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 273 | Notebook | 6/16/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 274 | Notebook | 7/27/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 275 | Notebook | 7/28/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 276 | Notebook | 8/31/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 277 | Notebook | 9/8/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 278 | Notebook | 9/9/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 279 | Notebook | 10/5/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 280 | Notebook | 10/14/2015 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Public Interest |
| 281 | Notebook | 10/20/2015 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Public Interest |
| 282 | Notebook | 12/23/2015 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Public Interest |
| 283 | Notebook | 1/22/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Public Interest |
| 284 | Notebook | 4/19/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 285 | Notebook | 7/6/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Public Interest |
| 286 | Notebook | 7/14/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 287 | Notebook | 8/31/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |

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| 288 | Notebook | 9/1/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 289 | Notebook | 9/1/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 290 | Notebook | 9/9/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 291 | Notebook | 9/20/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 292 | Notebook | 9/28/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 293 | Notebook | 10/5/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 294 | Notebook | 10/17/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 295 | Notebook | 10/18/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 296 | Notebook | 10/19/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 297 | Notebook | 10/25/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 298 | Notebook | 10/28/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 299 | Notebook | 11/1/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 300 | Notebook | 11/2/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 301 | Notebook | 11/3/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 302 | Notebook | 11/4/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 303 | Notebook | 11/16/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 304 | Notebook | 9/21/2015 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Public Interest |
| 305 | Notebook | 10/20/2015 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Public Interest |
| 306 | Notebook | 4/19/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 307 | Notebook | 4/22/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 308 | Notebook | 6/20/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 309 | Notebook | 7/6/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 310 | Notebook | 7/18/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 311 | Notebook | 8/5/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 312 | Notebook | 8/9/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 313 | Notebook | 9/1/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 314 | Notebook | 9/9/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 315 | Notebook | 9/20/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 316 | Notebook | 6/20/2016 | Competition Bureau Record | | | | | Lamoureux, Alex / Competition Bureau | Litigation Public Interest |
| 317 | Notebook | 6/22/2016 | Competition Bureau Record | | | | | Lamoureux, Alex / Competition Bureau | Litigation Public Interest |
| 318 | Notebook | 7/6/2016 | Competition Bureau Record | | | | | Lamoureux, Alex / Competition Bureau | Litigation Public Interest |
| 319 | Notebook | 7/14/2016 | Competition Bureau Record | | | | | Lamoureux, Alex / Competition Bureau | Litigation Public Interest |
| 320 | Notebook | 8/9/2016 | Competition Bureau Record | | | | | Lamoureux, Alex / Competition Bureau | Litigation Public Interest |
| 321 | Notebook | 9/1/2016 | Competition Bureau Record | | | | | Lamoureux, Alex / Competition Bureau | Litigation Public Interest |
| 322 | Notebook | 9/9/2016 | Competition Bureau Record | | | | | Lamoureux, Alex / Competition Bureau | Litigation Public Interest |
| 323 | Notebook | 10/18/2016 | Competition Bureau Record | | | | | Lamoureux, Alex / Competition Bureau | Litigation Public Interest |
| 324 | Notebook | 10/19/2016 | Competition Bureau Record | | | | | Lamoureux, Alex / Competition Bureau | Litigation Public Interest |

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| 325 | Notebook | 10/28/2016 | Competition Bureau Record | | | | | Lamoureux, Alex / Competition Bureau | Litigation Public Interest |
| 326 | Notebook | 11/2/2016 | Competition Bureau Record | | | | | Lamoureux, Alex / Competition Bureau | Litigation Public Interest |
| 327 | Notebook | 11/22/2016 | Competition Bureau Record | | | | | Lamoureux, Alex / Competition Bureau | Litigation Public Interest |
| 328 | Notebook | 6/5/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 329 | Notebook | 6/9/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 330 | Notebook | 6/16/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 331 | Notebook | 11/3/2016 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Litigation Public Interest |
| 332 | Notebook | 6/15/2016 | Competition Bureau Record | | | | | Anderson, Alexander / Competition Bureau | Public Interest |
| 333 | Notebook | 6/16/2016 | Competition Bureau Record | | | | | Anderson, Alexander / Competition Bureau | Public Interest |
| 334 | Notebook | 6/20/2016 | Competition Bureau Record | | | | | Anderson, Alexander / Competition Bureau | Public Interest |
| 335 | Notebook | 6/22/2016 | Competition Bureau Record | | | | | Anderson, Alexander / Competition Bureau | Public Interest |
| 336 | Notebook | 6/15/2016 | Competition Bureau Record | | | | | Hefler, Jennifer / Competition Bureau | Public Interest |
| 337 | Notebook | 6/16/2016 | Competition Bureau Record | | | | | Hefler, Jennifer / Competition Bureau | Public Interest |
| 338 | Notebook | 6/16/2016 | Competition Bureau Record | | | | | Hefler, Jennifer / Competition Bureau | Public Interest |
| 339 | Notebook | 6/17/2016 | Competition Bureau Record | | | | | Hefler, Jennifer / Competition Bureau | Public Interest |
| 340 | Notebook | 6/17/2016 | Competition Bureau Record | | | | | Hefler, Jennifer / Competition Bureau | Public Interest |
| 341 | Notebook | 6/20/2016 | Competition Bureau Record | | | | | Hefler, Jennifer / Competition Bureau | Public Interest |
| 342 | Notebook | 9/23/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Public Interest |
| 343 | Notebook | 9/28/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 344 | Notebook | 10/18/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 345 | Notebook | 10/19/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 346 | Notebook | 10/25/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 347 | Notebook | 10/28/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 348 | Notebook | 11/1/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 349 | Notebook | 11/4/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 350 | Notebook | 11/16/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 351 | Notebook | 11/22/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 352 | Notebook | 11/28/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 353 | Notebook | 11/28/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 354 | Notebook | 11/28/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 355 | Notebook | 11/30/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 356 | Notebook | 11/30/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 357 | Notebook | 12/20/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 358 | Notebook | 11/16/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Public Interest |
| 359 | Notebook | 11/22/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 360 | Notebook | 11/23/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 361 | Notebook | 11/28/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 362 | Notebook | 11/30/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 363 | Notebook | 11/30/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 364 | Notebook | 12/13/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |

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| 365 | Notebook | 12/13/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 366 | Notebook | 10/22/2014 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 367 | Notebook | 1/13/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 368 | Notebook | 4/7/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 369 | Notebook | 7/6/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 370 | Notebook | 7/7/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 371 | Notebook | 7/9/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 372 | Notebook | 7/14/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 373 | Notebook | 7/27/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 374 | Notebook | 8/19/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 375 | Notebook | 8/20/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 376 | Notebook | 9/21/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 377 | Notebook | 11/10/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 378 | Notebook | 1/22/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 379 | Notebook | 6/7/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 380 | Notebook | 6/20/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 381 | Notebook | 8/29/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 382 | Notebook | 9/26/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 383 | Notebook | 11/30/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 384 | Notebook | 12/2/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 385 | Memorandum | 12/19/2014 | Competition Bureau Record | Neily, Alicia / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 386 | Memorandum | 12/19/2014 | Competition Bureau Record | Neily, Alicia / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 387 | Memorandum | 7/7/2015 | Competition Bureau Record | Rushton, Kevin / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 388 | Memorandum | 10/17/2014 | Competition Bureau Record | Rushton, Kevin / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 389 | Scripts | 10/27/2014 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 390 | Memorandum | 10/28/2014 | Competition Bureau Record | Neily, Alicia / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 391 | Memorandum | 1/7/2015 | Competition Bureau Record | Neily, Alicia / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 392 | Other Internal | 4/19/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 393 | Interview Notes | 6/1/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 394 | Interview Notes | 6/1/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 395 | Interview Notes | 6/3/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 396 | Interview Notes | 6/4/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 397 | Interview Notes | 6/9/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 398 | Interview Notes | 6/17/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 399 | Memorandum | 9/8/2015 | Competition Bureau Record | Neily, Alicia / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 400 | Memorandum | 9/9/2015 | Competition Bureau Record | Neily, Alicia / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 401 | Other Internal | 12/18/2015 | Competition Bureau Record | | | | | Competition Bureau | Public Interest |
| 402 | Excel Spreadsheet | 3/29/2016 | Competition Bureau Record | | | | | Competition Bureau | Litigation Public Interest |
| 403 | Memorandum | 1/8/2015 | Competition Bureau Record | Dennis Mercan / Competition Bureau Neily, Alicia / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 404 | Interview Notes | 1/8/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 405 | Interview Notes | 1/9/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau Neily, Alicia / Competition Bureau | Public Interest |
| 406 | Interview Notes | 1/9/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 407 | Interview Notes | 1/9/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 408 | Interview Notes | 1/15/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 409 | Interview Notes | 1/15/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Public Interest |
| 410 | Interview Notes | 1/16/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |

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| 411 | Interview Notes | 1/16/2015 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau Neily, Alicia / Competition Bureau | Public Interest |
| 412 | Presentation | 1/26/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 413 | Memorandum | 2/2/2015 | Competition Bureau Record | Neily, Alicia / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 414 | Interview Notes | 2/3/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 415 | Presentation | 2/6/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 416 | Interview Notes | 3/13/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 417 | Interview Notes | 3/11/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 418 | Interview Notes | 3/27/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 419 | Interview Notes | 3/27/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 420 | Presentation | 4/2/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 421 | Other Internal | 5/22/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 422 | Interview Notes | 5/29/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 423 | Presentation | 6/1/2015 | Competition Bureau Record | | | | | Competition Bureau | Public Interest |
| 424 | Interview Notes | 6/4/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 425 | Presentation | 6/5/2015 | Competition Bureau Record | | | | | Competition Bureau | Public Interest |
| 426 | Interview Notes | 6/5/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 427 | Presentation | 6/9/2015 | Competition Bureau Record | | | | | Competition Bureau | Public Interest |
| 428 | Presentation | 6/9/2015 | Competition Bureau Record | | | | | Competition Bureau | Public Interest |
| 429 | Presentation | 6/12/2015 | Competition Bureau Record | | | | | Competition Bureau | Public Interest |
| 430 | Presentation | 6/15/2015 | Competition Bureau Record | | | | | Competition Bureau | Public Interest |
| 431 | Interview Notes | 6/15/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 432 | Memorandum | 6/18/2015 | Competition Bureau Record | Mercan, Dennis / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 433 | Memorandum | 7/13/2015 | Competition Bureau Record | Conor Yerbury / Competition Bureau Neily, Alicia / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 434 | Memorandum | 7/27/2015 | Competition Bureau Record | Neily, Alicia / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 435 | Memorandum | 7/27/2015 | Competition Bureau Record | Neily, Alicia / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 436 | Memorandum | 8/18/2015 | Competition Bureau Record | Rushton, Kevin / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 437 | Memorandum | 8/19/2015 | Competition Bureau Record | Rushton, Kevin / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 438 | Memorandum | 8/20/2015 | Competition Bureau Record | Rushton, Kevin / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 439 | Memorandum | 8/20/2015 | Competition Bureau Record | Rushton, Kevin / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 440 | Memorandum | 8/31/2015 | Competition Bureau Record | Neily, Alicia / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 441 | Memorandum | 10/5/2015 | Competition Bureau Record | Neily, Alicia / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 442 | Memorandum | 10/20/2015 | Competition Bureau Record | Bergeron, Francis / Competition Bureau Neily, Alicia / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 443 | Memorandum | 11/10/2015 | Competition Bureau Record | Foster, Alicia / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 444 | Interview Notes | 1/28/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Public Interest |
| 445 | Scripts | 1/22/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 446 | Interview Notes | 1/26/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Public Interest |
| 447 | Interview Notes | 1/28/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Public Interest |
| 448 | Presentation | 2/18/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 449 | Interview Notes | 4/7/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 450 | Interview Notes | 4/7/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 451 | Other Internal | 4/18/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest Solicitor-Client |
| 452 | Articles | 7/27/2014 | Record Received from Third Party | | | | | Third Party | Litigation |
| 453 | Presentation | 4/1/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 454 | Memorandum | 5/25/2015 | Competition Bureau Record | Vancouver Airport Authority Case Team / Competition Bureau | Major Enforcement and Advocacy Committee / Competition Bureau | | | | Public Interest |
| 455 | Excel Spreadsheet | 12/10/2015 | Competition Bureau Record | | | | | Bilodeau, Howard / Competition Bureau | Public Interest |

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| 456 | Excel Spreadsheet | 2/26/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 457 | Excel Spreadsheet | 2/7/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 458 | Other Internal | 10/23/2015 | Competition Bureau Record | | | | | Competition Bureau | Public Interest |
| 459 | Memorandum | 5/29/2015 | Competition Bureau Record | Mercan, Dennis / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 460 | Memorandum | 6/17/2015 | Competition Bureau Record | Mercan, Dennis / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 461 | Interview Notes | 5/6/2011 | Competition Bureau Record | | | | | Competition Bureau | Public Interest |
| 462 | Corporate_Information | 9/22/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 463 | Financial_Records | 12/30/2008 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 464 | Financial_Records | 3/30/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 465 | Financial_Records | 6/29/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 466 | Email | 6/6/2010 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 467 | Presentation | 11/9/2009 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 468 | Presentation | 12/4/2009 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 469 | Presentation | 1/1/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 470 | Presentation | 1/29/2007 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 471 | Board Document | 6/7/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 472 | Affidavit | 9/30/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 473 | Form | 9/30/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 474 | Form | 9/30/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 475 | Financial_Records | 12/29/2009 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 476 | Form | 9/28/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 477 | Letter | 9/29/2010 | Record Received from Third Party | Third Party | Commissioner of Competition / Competition Bureau | Third Party | | | Public Interest |
| 478 | Memorandum | 10/7/2010 | Competition Bureau Record | Gendron-O'Donnell, Alexa / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 479 | Memorandum | 10/8/2010 | Competition Bureau Record | Gendron-O'Donnell, Alexa / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 480 | Memorandum | 10/8/2010 | Competition Bureau Record | Gendron-O'Donnell, Alexa / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 481 | Memorandum | 10/7/2010 | Competition Bureau Record | Gendron-O'Donnell, Alexa / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 482 | Memorandum | 10/12/2010 | Competition Bureau Record | Gendron-O'Donnell, Alexa / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 483 | Memorandum | 10/15/2010 | Competition Bureau Record | Gendron-O'Donnell, Alexa / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 484 | Memorandum | 10/6/2010 | Competition Bureau Record | Gendron-O'Donnell, Alexa / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 485 | Email | 10/25/2010 | Competition Bureau Record | Gendron-O'Donnell, Alexa / Competition Bureau | Wallwork, Ann / Competition Bureau | Millette, Vincent / Competition Bureau | | | Public Interest |
| 486 | Agreement | 9/15/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 487 | Agreement | 9/15/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 488 | Financial_Records | 6/17/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 489 | Financial_Records | 9/23/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 490 | Presentation | 9/27/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 491 | Business Record | 6/1/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 492 | Board Document | 6/21/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 493 | Board Document | 6/22/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 494 | Board Document | 8/9/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 495 | Board Document | 9/14/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 496 | Agreement | 9/30/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 497 | Presentation | 4/1/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 498 | Expert Document | 5/13/2016 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 499 | Other External | 5/13/2016 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 500 | Other External | 10/3/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |

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| 501 | Affidavit | 10/3/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 502 | Affidavit | 10/3/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 503 | Affidavit | 10/3/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 504 | Affidavit | 10/3/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 505 | Affidavit | 10/3/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 506 | Affidavit | 10/3/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 507 | Memorandum | 10/16/2014 | Competition Bureau Record | Kellison, Matthew / Competition Bureau | Taylor, Richard / Competition Bureau | | | | Public Interest |
| 508 | Other External | 10/3/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 509 | Email | | Record Received from Third Party | Third Party | Vancouver Airport Authority | Vancouver Airport Authority | | | Public Interest |
| 510 | Email | 1/8/2015 | Record Received from Third Party | Third Party | Neily, Alicia / Competition Bureau | | | | Public Interest |
| 511 | Email | 8/4/2015 | Record Received from Third Party | Third Party | Neily, Alicia / Competition Bureau | | | | Public Interest |
| 512 | Email | 9/28/2015 | Record Received from Third Party | Third Party | Neily, Alicia / Competition Bureau | | | | Public Interest |
| 513 | Email | 12/12/2015 | Record Received from Third Party | Third Party | Horn, Michael / Competition Bureau Legal Services | Di Domenico, Antonio / Competition Bureau Legal Services Rushton, Kevin / Competition Bureau | | | Public Interest |
| 514 | Email | 6/12/2015 | Record Received from Third Party | Third Party | Neily, Alicia / Competition Bureau | | | | Public Interest |
| 515 | Extracted Image | 6/3/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 516 | Memorandum | 10/17/2014 | Competition Bureau Record | Kellison, Matthew / Competition Bureau | Taylor, Richard / Competition Bureau | | | | Public Interest |
| 517 | Email | 10/3/2014 | Competition Bureau Record | Kellison, Matthew / Competition Bureau | Rushton, Kevin / Competition Bureau | | | | Public Interest |
| 518 | Email | | Record Received from Third Party | Vancouver Airport Authority | Third Party | | | | Public Interest |
| 519 | Email | 1/19/2015 | Record Received from Third Party | Third Party | Horn, Michael / Competition Bureau Legal Services | | | | Public Interest |
| 520 | Email | 2/4/2015 | Record Received from Third Party | Third Party | Third Party Horn, Michael / Competition Bureau Legal Services | Di Domenico, Antonio / Competition Bureau Legal Services Third Party | | | Public Interest |
| 521 | Email | 5/29/2015 | Record Received from Third Party | Third Party | Neily, Alicia / Competition Bureau | Third Party | | | Public Interest |
| 522 | Email | 6/29/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 523 | Extracted Image | 6/26/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 524 | Email | 10/8/2015 | Record Received from Third Party | Third Party | | Third Party | | | Public Interest |
| 525 | Reports | 2/11/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 526 | Presentation | 2/17/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 527 | Reports | 2/18/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 528 | Presentation | 4/1/2016 | Competition Bureau Record | | | | | Competition Bureau | Litigation Public Interest |
| 529 | Memorandum | 3/26/2014 | Competition Bureau Record | Harrington, Jason / Competition Bureau Legal Services | Taylor, Richard / Competition Bureau | Department of Justice / Ministère de la Justice Enforcement and Policy Committee Public Prosecution Service of Canada | Rhona Einbinder-Miller / Competition Bureau Legal Services | | Public Interest Solicitor Client |
| 530 | Email | 6/8/2016 | Record Received from Third Party | Third Party | Rushton, Kevin / Competition Bureau | | | | Public Interest |
| 531 | Email | 6/15/2016 | Record Received from Third Party | Third Party | Rushton, Kevin / Competition Bureau | | | | Public Interest |
| 532 | Memorandum | 7/14/2016 | Competition Bureau Record | Garneau, Josianne / Competition Bureau | File / Competition Bureau | | | | Litigation Public Interest |
| 533 | Memorandum | 10/26/2010 | Competition Bureau Record | Gendron-O'Donnell, Alexa / Competition Bureau | Wallwork, Ann / Competition Bureau | | | | Public Interest |
| 534 | Email | 3/2/2015 | Record Received from Third Party | Third Party | Rushton, Kevin / Competition Bureau | | | | Public Interest |
| 535 | Email | 9/18/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 536 | Email | 12/13/2013 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 537 | Email | 3/7/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 538 | Email | 3/7/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 539 | Email | 3/7/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 540 | Email | 3/7/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 541 | Email | 3/7/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 542 | Agreement | 6/22/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 543 | Agreement | 2/15/2010 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 544 | Agreement | 6/1/2011 | Record Received from Third Party | | | | | Third Party | Public Interest |

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| 545 | Email | 4/2/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 546 | Agreement | 5/15/2008 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 547 | Email | 6/10/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 548 | Email | 6/23/2015 | Record Received from Third Party | Third Party | Rushton, Kevin / Competition Bureau | Third Party | | | Public Interest |
| 549 | Affidavit | 6/25/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 550 | Email | 7/1/2015 | Record Received from Third Party | Third Party | Rushton, Kevin / Competition Bureau | Third Party | | | Public Interest |
| 551 | Email | 8/31/2016 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 552 | Interview Notes | 5/28/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 553 | Interview Notes | 6/3/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 554 | Interview Notes | 6/5/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 555 | Interview Notes | 6/12/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 556 | Email | 6/15/2015 | Competition Bureau Record | Neily, Alicia / Competition Bureau | Rushton, Kevin / Competition Bureau | | | | Public Interest |
| 557 | Affidavit | 11/27/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 558 | Letter | 11/12/2015 | Record Received from Third Party | Third Party | Di Domenico, Antonio / Competition Bureau Legal Services Horn, Michael / Competition Bureau Legal Services | | | | Public Interest |
| 559 | Presentation | 2/16/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 560 | Memorandum | 4/28/2016 | Competition Bureau Record | Vancouver Airport Authority Case Team / Competition Bureau | Major Enforcement and Advocacy Committee / Competition Bureau | | | | Litigation Public Interest |
| 561 | Memorandum | 10/15/2014 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 562 | Interview Notes | 1/7/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 563 | Interview Notes | 1/8/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 564 | Interview Notes | 3/11/2015 | Competition Bureau Record | | | | | Neily, Alicia / Competition Bureau | Public Interest |
| 565 | Presentation | 3/30/2015 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 566 | Email | 4/8/2015 | Competition Bureau Record | Neily, Alicia / Competition Bureau | Rushton, Kevin / Competition Bureau | Mercan, Dennis / Competition Bureau | | | Public Interest |
| 567 | Email | 6/2/2015 | Competition Bureau Record | Rushton, Kevin / Competition Bureau | Neily, Alicia / Competition Bureau | | | | Public Interest |
| 568 | Presentation | 6/5/2015 | Competition Bureau Record | | | | | Competition Bureau | Public Interest |
| 569 | Email | 7/6/2015 | Competition Bureau Record | Brazeau, Julien / Competition Bureau | Joly, Brigitte / Competition Bureau Margison, Christopher / Competition Bureau | Durocher, Anthony / Competition Bureau Gendron-O'Donnell, Alexa / Competition Bureau Neily, Alicia / Competition Bureau Pratt, Jeanne / Competition Bureau Rushton, Kevin / Competition Bureau | | | Public Interest |
| 570 | Letter | 10/6/2015 | Record Received from Third Party | Third Party | Competition Bureau | | | | Public Interest |
| 571 | Email | 8/10/2015 | Record Received from Third Party | Third Party | Neily, Alicia / Competition Bureau | Third Party Rushton, Kevin / Competition Bureau | | | Public Interest |
| 572 | Other Internal | 8/25/2016 | Competition Bureau Record | | | | | Lamoureux, Alex / Competition Bureau | Litigation Public Interest |
| 573 | Email | 8/18/2016 | Record Received from Third Party | Third Party | Rushton, Kevin / Competition Bureau | Charania, Majid / Competition Bureau Legal Services Di Domenico, Antonio / Competition Bureau Bureau Legal Services | | | Public Interest |
| 574 | Email | | Record Received from Third Party | Vancouver Airport Authority | Third Party Vancouver Airport Authority | | | | Public Interest |
| 575 | Other Internal | 8/24/2016 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Litigation Public Interest |
| 576 | Other Internal | 8/17/2016 | Competition Bureau Record | | | | | Mercan, Dennis / Competition Bureau | Litigation Public Interest |
| 577 | Other Internal | 9/16/2016 | Competition Bureau Record | | | | | Bildstein, Taylor / Competition Bureau | Litigation Public Interest |
| 578 | Articles | 1/1/2015 | Record Received from Third Party | | | | | Third Party | Litigation |
| 579 | Other Internal | 8/25/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 580 | Other Internal | 9/6/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 581 | Other Internal | 9/6/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Public Interest |
| 582 | Other Internal | 8/5/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 583 | Other Internal | 9/23/2016 | Competition Bureau Record | | | | | Bildstein, Taylor / Competition Bureau | Litigation Public Interest |

| Count | Document Type | Main Date | Title | People/Organizations From | People/Organizations To | People/Organizations CC | People/Organizations Between | People/Organizations Author | Privilege |
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| 584 | Other Internal | 7/26/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 585 | Other Internal | 7/26/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 586 | Other Internal | 9/27/2016 | Competition Bureau Record | | | | | Bildstein, Taylor / Competition Bureau | Litigation Public Interest |
| 587 | Other Internal | 9/12/2016 | Competition Bureau Record | | | | | Bildstein, Taylor / Competition Bureau | Litigation Public Interest |
| 588 | Other Internal | 9/12/2016 | Competition Bureau Record | | | | | Bildstein, Taylor / Competition Bureau | Litigation Public Interest |
| 589 | Email | 6/28/2016 | Competition Bureau Record | Hefler, Jennifer / Competition Bureau | Rushton, Kevin / Competition Bureau | Anderson, Alexander / Competition Bureau Fisher, Melissa / Competition Bureau | | | Public Interest |
| 590 | Email | 6/21/2016 | Record Received from Third Party | Third Party | Rushton, Kevin / Competition Bureau | | | | Public Interest |
| 591 | Corporate_Information | 6/17/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 592 | Other Internal | 9/27/2016 | Competition Bureau Record | | | | | Bildstein, Taylor / Competition Bureau | Litigation Public Interest |
| 593 | Other Internal | 9/27/2016 | Competition Bureau Record | | | | | Bildstein, Taylor / Competition Bureau | Litigation Public Interest |
| 594 | Other Internal | 9/16/2016 | Competition Bureau Record | | | | | Bildstein, Taylor / Competition Bureau | Litigation Public Interest |
| 595 | Other Internal | 9/26/2016 | Competition Bureau Record | | | | | Bildstein, Taylor / Competition Bureau | Litigation Public Interest |
| 596 | Other Internal | 9/26/2016 | Competition Bureau Record | | | | | Bildstein, Taylor / Competition Bureau | Litigation Public Interest |
| 597 | Other Internal | 9/19/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 598 | Other Internal | 10/6/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 599 | Other Internal | 9/16/2016 | Competition Bureau Record | | | | | Bildstein, Taylor / Competition Bureau | Litigation Public Interest |
| 600 | Other Internal | 9/16/2016 | Competition Bureau Record | | | | | Bildstein, Taylor / Competition Bureau | Litigation Public Interest |
| 601 | Other Internal | 9/16/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest Solicitor Client |
| 602 | Other Internal | 9/16/2016 | Competition Bureau Record | | | | | Bildstein, Taylor / Competition Bureau | Public Interest |
| 603 | Other Internal | 9/16/2016 | Competition Bureau Record | | | | | Bildstein, Taylor / Competition Bureau | Litigation Public Interest |
| 604 | Other Internal | 9/14/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest Solicitor Client |
| 605 | Other Internal | 9/13/2016 | Competition Bureau Record | | | | | Bildstein, Taylor / Competition Bureau | Litigation Public Interest |
| 606 | Other Internal | 9/23/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest Solicitor Client |
| 607 | Other Internal | 8/26/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 608 | Other Internal | 9/26/2016 | Competition Bureau Record | | | | | Bildstein, Taylor / Competition Bureau | Litigation Public Interest |
| 609 | Email | 8/30/2016 | Record Received from Third Party | Third Party | Charania, Majid / Competition Bureau Legal Services Di Domenico, Antonio / Competition Bureau Bureau Legal Services | | | | Litigation Public Interest |
| 610 | Other Internal | 6/15/2016 | Competition Bureau Record | | | | | Lamoureux, Alex / Competition Bureau | Public Interest |
| 611 | Other Internal | 6/27/2016 | Competition Bureau Record | | | | | Lamoureux, Alex / Competition Bureau | Litigation Public Interest |
| 612 | Other Internal | 9/14/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest Solicitor Client |
| 613 | Email | 7/6/2016 | Competition Bureau Record | Charania, Majid / Competition Bureau Legal Services | Di Domenico, Antonio / Competition Bureau Bureau Legal Services | | | | Public Interest |
| 614 | Other Internal | 7/14/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 615 | Other Internal | 7/13/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 616 | Other Internal | 8/18/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 617 | Email | 7/5/2016 | Record Received from Third Party | Third Party | Rushton, Kevin / Competition Bureau | | | | Public Interest |

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| 618 | Other Internal | 8/1/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 619 | Interview Notes | 7/18/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 620 | Interview Notes | 10/24/2016 | Competition Bureau Record | | | | | Francis Bergeron / Competition Bureau | Litigation Public Interest |
| 621 | Interview Notes | 11/3/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 622 | Interview Notes | 8/9/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 623 | Interview Notes | 6/29/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Public Interest |
| 624 | Interview Notes | 6/20/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 625 | Interview Notes | 10/31/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 626 | Interview Notes | 5/31/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 627 | Memorandum | 10/5/2016 | Competition Bureau Record | Foster, Alicia / Competition Bureau | File / Competition Bureau | | | | Litigation Public Interest |
| 628 | Interview Notes | 11/2/2016 | Competition Bureau Record | | | | | Francis Bergeron / Competition Bureau | Litigation Public Interest |
| 629 | Memorandum | 6/13/2016 | Competition Bureau Record | Rushton, Kevin / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 630 | Memorandum | 7/6/2016 | Competition Bureau Record | Bergeron, Francis / Competition Bureau | File / Competition Bureau | | | | Litigation Public Interest |
| 631 | Interview Notes | 9/23/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 632 | Other Internal | 6/16/2016 | Competition Bureau Record | | | | | Anderson, Alexander / Competition Bureau | Public Interest |
| 633 | Memorandum | 6/20/2016 | Competition Bureau Record | Anderson, Alexander / Competition Bureau | Fisher, Melissa / Competition Bureau | | | | Public Interest |
| 634 | Memorandum | 6/20/2016 | Competition Bureau Record | Anderson, Alexander / Competition Bureau | Fisher, Melissa / Competition Bureau | | | | Public Interest |
| 635 | Memorandum | 6/20/2016 | Competition Bureau Record | Anderson, Alexander / Competition Bureau | Fisher, Melissa / Competition Bureau | | | | Public Interest |
| 636 | Memorandum | 6/22/2016 | Competition Bureau Record | Anderson, Alexander / Competition Bureau | Fisher, Melissa / Competition Bureau | | | | Public Interest |
| 637 | Memorandum | 6/24/2016 | Competition Bureau Record | Anderson, Alexander / Competition Bureau | Fisher, Melissa / Competition Bureau | | | | Public Interest |
| 638 | Memorandum | 6/27/2016 | Competition Bureau Record | Anderson, Alexander / Competition Bureau | Fisher, Melissa / Competition Bureau | | | | Public Interest |
| 639 | Memorandum | 6/20/2016 | Competition Bureau Record | Anderson, Alexander / Competition Bureau | Fisher, Melissa / Competition Bureau | | | | Public Interest |
| 640 | Other Internal | 6/13/2016 | Competition Bureau Record | | | | | Anderson, Alexander / Competition Bureau | Public Interest |
| 641 | Letter | 6/8/2016 | Record Received from Third Party | Third Party | Commissioner of Competition / Competition Bureau | Third Party | | | Public Interest |
| 642 | Memorandum | 6/27/2016 | Competition Bureau Record | Anderson, Alexander / Competition Bureau | Fisher, Melissa / Competition Bureau | | | | Public Interest |
| 643 | Interview Notes | 6/17/2016 | Competition Bureau Record | | | | | Anderson, Alexander / Competition Bureau | Public Interest |
| 644 | Interview Notes | 6/17/2016 | Competition Bureau Record | | | | | Anderson, Alexander / Competition Bureau | Public Interest |
| 645 | Email | 6/23/2016 | Record Received from Third Party | Third Party | Third Party Hefler, Jennifer / Competition Bureau | Anderson, Alexander / Competition Bureau Third Party | | | Public Interest |
| 646 | Letter | 6/8/2015 | Record Received from Third Party | Third Party | Commissioner of Competition / Competition Bureau | Third Party | | | Public Interest |
| 647 | Other Internal | 12/16/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 648 | Other Internal | 12/16/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 649 | Business Record | 2/25/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 650 | Email | 11/18/2016 | Record Received from Third Party | Third Party | Third Party Rushton, Kevin / Competition Bureau | Third Party | | | Public Interest |
| 651 | Other External | 11/18/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 652 | Invoice | 10/21/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 653 | Invoice | 11/1/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 654 | Invoice | 9/14/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 655 | Invoice | 10/1/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 656 | Letter | | Record Received from Third Party | Third Party | Vancouver Airport Authority | | | | Public Interest |

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| 657 | Articles | 1/1/1986 | Record Received from Third Party | | | | | Third Party | Litigation |
| 658 | Other Internal | 11/9/2016 | Competition Bureau Record | | | | | Soulière, André / Competition Bureau | Litigation Public Interest |
| 659 | Other Internal | 11/7/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 660 | Other Internal | 11/7/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 661 | Other Internal | 11/7/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 662 | Other Internal | 11/7/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 663 | Other Internal | 11/7/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 664 | Other Internal | 11/7/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 665 | Other Internal | 11/7/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 666 | Other Internal | 11/7/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 667 | Other Internal | 11/7/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 668 | Other Internal | 11/7/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 669 | Other Internal | 11/1/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 670 | Other Internal | 11/1/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 671 | Other Internal | 11/1/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 672 | Email | 4/7/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 673 | Email | 6/6/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 674 | Email | 9/4/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 675 | Email | 4/28/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 676 | Email | 10/26/2016 | Record Received from Third Party | Third Party | Rushton, Kevin / Competition Bureau | Third Party Hood, Jonathan / Competition Bureau Legal Services | | | Public Interest |
| 677 | Email | 10/31/2016 | Record Received from Third Party | Third Party | Caron, Ryan / Competition Bureau Legal Services Hood, Jonathan / Competition Bureau Legal Services Rushton, Kevin / Competition Bureau Rydel, Katherine / Competition Bureau Legal Services | | | | Public Interest |
| 678 | Email | 10/26/2016 | Record Received from Third Party | Third Party | Caron, Ryan / Competition Bureau Legal Services Hood, Jonathan / Competition Bureau Legal Services Rushton, Kevin / Competition Bureau Rydel, Katherine / Competition Bureau Legal Services | | | | Public Interest |
| 679 | Other Internal | 10/28/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 680 | Other Internal | 10/28/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 681 | Other Internal | 10/28/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 682 | Email | 10/5/2016 | Record Received from Third Party | Third Party | Caron, Ryan / Competition Bureau Legal Services Di Domenico, Antonio / Competition Bureau Legal Services Rushton, Kevin / Competition Bureau Rydel, Katherine / Competition Bureau Legal Services | | | | Litigation Public Interest |
| 683 | Other External | 10/5/2016 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 684 | Memorandum | 6/6/2016 | Competition Bureau Record | Bergeron, Francis / Competition Bureau | File / Competition Bureau | | | | Litigation Public Interest |
| 685 | Memorandum | 6/7/2016 | Competition Bureau Record | Bergeron, Francis / Competition Bureau | File / Competition Bureau | | | | Litigation Public Interest |
| 686 | Interview Notes | 6/20/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |

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|-------|-----------------|------------|---------------------------|--|---------------------------|-------------------------|------------------------------|---|---|
| 687 | Interview Notes | 6/20/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 688 | Other Internal | 7/26/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 689 | Interview Notes | 7/18/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 690 | Interview Notes | 8/9/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 691 | Interview Notes | 11/1/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 692 | Interview Notes | 11/3/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 693 | Interview Notes | 11/7/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 694 | Interview Notes | 11/14/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 695 | Interview Notes | 11/22/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 696 | Interview Notes | 11/22/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 697 | Other Internal | 11/23/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 698 | Interview Notes | 11/24/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 699 | Interview Notes | 11/30/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 700 | Interview Notes | 11/28/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 701 | Interview Notes | 6/22/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 702 | Interview Notes | 6/22/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 703 | Memorandum | 4/29/2016 | Competition Bureau Record | Bergeron, Francis / Competition Bureau | File / Competition Bureau | | | | Litigation Public Interest |
| 704 | Memorandum | 4/29/2016 | Competition Bureau Record | Bergeron, Francis / Competition Bureau | File / Competition Bureau | | | | Litigation Public Interest |
| 705 | Memorandum | 6/7/2016 | Competition Bureau Record | Bergeron, Francis / Competition Bureau | File / Competition Bureau | | | | Public Interest |
| 706 | Memorandum | 6/27/2016 | Competition Bureau Record | Garneau, Josianne / Competition Bureau | File / Competition Bureau | | | | Litigation Public Interest |
| 707 | Other Internal | 8/16/2016 | Competition Bureau Record | | | | | Kingston, Brianne / Competition Bureau | Litigation Public Interest |
| 708 | Other Internal | 8/23/2016 | Competition Bureau Record | | | | | Kingston, Brianne / Competition Bureau | Litigation Public Interest |
| 709 | Other Internal | 8/24/2016 | Competition Bureau Record | | | | | Kingston, Brianne / Competition Bureau | Litigation Public Interest |
| 710 | Other Internal | 11/14/2016 | Competition Bureau Record | | | | | Lamoureux, Alex / Competition Bureau | Litigation Public Interest |
| 711 | Other Internal | 9/28/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 712 | Other Internal | 9/29/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 713 | Memorandum | 9/19/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 714 | Other Internal | 9/21/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest Solicitor Client |
| 715 | Other Internal | 10/6/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 716 | Memorandum | 10/19/2016 | Competition Bureau Record | Foster, Alicia / Competition Bureau | File / Competition Bureau | | | | Litigation Public Interest |
| 717 | Memorandum | 10/19/2016 | Competition Bureau Record | Foster, Alicia / Competition Bureau | File / Competition Bureau | | | | Litigation Public Interest |
| 718 | Interview Notes | 10/24/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 719 | Other Internal | 11/16/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |

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| 720 | Memorandum | 12/1/2016 | Competition Bureau Record | Bergeron, Francis / Competition Bureau | File / Competition Bureau | | | | Litigation Public Interest |
| 721 | Interview Notes | 12/2/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 722 | Interview Notes | 12/13/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 723 | Other Internal | 10/18/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Public Interest |
| 724 | Other Internal | 10/17/2016 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 725 | Expert Document | 12/8/2016 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 726 | Other Internal | 12/30/2016 | Competition Bureau Record | | | | | Parson, Conor / Competition Bureau | Litigation Public Interest |
| 727 | Other Internal | 5/16/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 728 | Business Record | 11/6/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 729 | Business Record | 11/6/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 730 | Business Record | 7/7/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 731 | Email | 7/8/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 732 | Presentation | 5/30/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 733 | Business Record | 7/7/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 734 | Business Record | 5/10/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 735 | Business Record | 11/10/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 736 | Other Internal | 12/14/2016 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 737 | Reports | 10/6/2011 | Competition Bureau Record | | | | | Competition Bureau | Public Interest |
| 738 | Other Internal | 12/16/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 739 | Other Internal | 12/16/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 740 | Other Internal | 12/30/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 741 | Other Internal | 12/8/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 742 | Other Internal | 12/12/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 743 | Other Internal | 12/12/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 744 | Other Internal | 12/12/2016 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 745 | Letter | 11/23/2015 | Record Received from Third Party | Third Party | Rushton, Kevin / Competition Bureau | | | | Public Interest |
| 746 | Affidavit | 11/27/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 747 | Email | | Record Received from Third Party | Third Party | Third Party | Vancouver Airport Authority | | | Public Interest |
| 748 | Email | 10/6/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 749 | Letter | | Record Received from Third Party | Vancouver Airport Authority | Third Party | | | | Public Interest |
| 750 | Email | 9/23/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 751 | Business Record | | Record Received from Third Party | | | | | Vancouver Airport Authority | Public Interest |
| 752 | Email | 11/6/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 753 | Business Record | 8/12/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 754 | Email | 7/14/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 755 | Letter | 7/14/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 756 | Business Record | 6/1/2015 | Record Received from Third Party | Third Party | | | | | Public Interest |
| 757 | Email | 6/12/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 758 | Email | 9/2/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 759 | Email | | Record Received from Third Party | Vancouver Airport Authority | Third Party | | | | Public Interest |
| 760 | Email | 9/28/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 761 | Email | 8/21/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 762 | Email | | Record Received from Third Party | Vancouver Airport Authority | Third Party | Vancouver Airport Authority | | | Public Interest |
| 763 | Email | 10/8/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 764 | Email | 2/3/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 765 | Email | 6/3/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |

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|-------|-----------------|------------|----------------------------------|---------------------------|-------------------------|-------------------------|------------------------------|-----------------------------|-----------------|
| 766 | Email | 5/26/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 767 | Email | 9/4/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 768 | Email | 4/23/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 769 | Email | 7/12/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 770 | Email | 6/13/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 771 | Email | 6/19/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 772 | Email | 10/5/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 773 | Letter | 10/5/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 774 | Email | 6/18/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 775 | Email | 6/27/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 776 | Business Record | 6/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 777 | Email | 5/2/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 778 | Email | 7/4/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 779 | Email | 7/14/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 780 | Email | 7/10/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 781 | Email | 6/9/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 782 | Business Record | 5/14/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 783 | Email | 4/28/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 784 | Email | 4/17/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 785 | Business Record | 3/5/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 786 | Email | 5/29/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 787 | Business Record | 5/21/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 788 | Business Record | 5/21/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 789 | Email | 4/8/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 790 | Email | 4/16/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 791 | Letter | 4/7/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 792 | Letter | 4/7/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 793 | Email | 3/27/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 794 | Letter | 3/27/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 795 | Business Record | 1/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 796 | Business Record | 4/21/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 797 | Email | 5/7/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 798 | Business Record | 5/12/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 799 | Email | 11/27/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 800 | Agreement | 12/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 801 | Email | 5/9/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 802 | Business Record | 5/12/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 803 | Letter | 10/29/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 804 | Business Record | 5/12/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 805 | Business_Plans | 5/12/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 806 | Email | 4/7/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 807 | Email | 3/31/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 808 | Email | 4/24/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 809 | Email | 7/4/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 810 | Email | 5/6/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 811 | Email | 4/18/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 812 | Email | 4/2/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 813 | Email | 4/3/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 814 | Email | 6/26/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 815 | Email | 4/7/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 816 | Email | 4/7/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 817 | Email | 11/24/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |

| Count | Document Type | Main Date | Title | People/Organizations From | People/Organizations To | People/Organizations CC | People/Organizations Between | People/Organizations Author | Privilege |
|-------|-----------------|------------|----------------------------------|-----------------------------|-------------------------|-------------------------|------------------------------|-----------------------------|-----------------|
| 818 | Email | 10/29/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 819 | Letter | 10/29/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 820 | Email | 4/23/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 821 | Business Record | 4/23/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 822 | Email | 4/7/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 823 | Email | 3/3/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 824 | Business Record | 5/1/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 825 | Business Record | 3/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 826 | Business Record | 3/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 827 | Business Record | 3/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 828 | Business Record | 3/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 829 | Business Record | 3/3/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 830 | Business Record | 3/3/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 831 | Business Record | 3/3/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 832 | Email | 4/11/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 833 | Email | 12/1/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 834 | Agreement | 11/3/2014 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 835 | Agreement | 11/3/2014 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 836 | Email | 10/8/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 837 | Agreement | 12/1/2014 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 838 | Email | 11/21/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 839 | Agreement | 12/1/2014 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 840 | Email | 6/27/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 841 | Email | 5/23/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 842 | Business Record | 5/23/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 843 | Email | 5/15/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 844 | Email | 4/5/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 845 | Email | 1/30/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 846 | Business Record | 4/20/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 847 | Business Record | 6/2/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 848 | Business Record | 6/2/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 849 | Business Record | 6/2/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 850 | Business Record | 6/23/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 851 | Business Record | 6/2/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 852 | Business Record | 6/2/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 853 | Business Record | 6/2/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 854 | Business Record | 6/2/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 855 | Business Record | 6/2/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 856 | Business Record | 6/2/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 857 | Business Record | 7/6/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 858 | Business Record | 6/2/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 859 | Business Record | 6/2/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 860 | Business Record | 6/2/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 861 | Business Record | 8/18/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 862 | Business Record | 2/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 863 | Business Record | 6/10/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 864 | Business Record | 7/15/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 865 | Letter | | Record Received from Third Party | Vancouver Airport Authority | Third Party | | | | Public Interest |
| 866 | Business Record | 7/7/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 867 | Email | 11/2/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 868 | Email | 6/12/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 869 | Email | 9/28/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |

| Count | Document Type | Main Date | Title | People/Organizations From | People/Organizations To | People/Organizations CC | People/Organizations Between | People/Organizations Author | Privilege |
|-------|-----------------|------------|----------------------------------|---------------------------|-------------------------|-------------------------|------------------------------|-----------------------------|-----------------|
| 870 | Email | 5/28/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 871 | Email | 9/22/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 872 | Email | 2/4/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 873 | Email | 3/2/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 874 | Email | 8/31/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 875 | Email | 8/25/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 876 | Email | 7/21/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 877 | Email | 4/24/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 878 | Email | 4/9/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 879 | Email | 6/17/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 880 | Email | 11/18/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 881 | Email | 9/10/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 882 | Email | 5/8/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 883 | Email | 10/19/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 884 | Email | 9/11/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 885 | Email | 3/3/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 886 | Email | 4/24/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 887 | Email | 5/26/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 888 | Letter | 7/10/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 889 | Email | 8/17/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 890 | Email | 12/24/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 891 | Email | 4/23/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 892 | Business Record | 4/23/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 893 | Business Record | 4/23/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 894 | Business Record | 4/23/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 895 | Business Record | 4/23/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 896 | Business Record | 4/23/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 897 | Email | 12/4/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 898 | Letter | 12/4/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 899 | Business Record | 11/2/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 900 | Email | 11/4/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 901 | Letter | 11/3/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 902 | Email | 4/21/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 903 | Email | 6/6/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 904 | Email | 10/9/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 905 | Business Record | 10/3/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 906 | Business Record | 10/6/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 907 | Business Record | 10/6/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 908 | Business Record | 10/6/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 909 | Business Record | 10/6/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 910 | Business Record | 10/6/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 911 | Business Record | 10/6/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 912 | Business Record | 10/9/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 913 | Business Record | 10/6/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 914 | Agreement | 8/1/2014 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 915 | Business Record | 10/6/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 916 | Agreement | 10/8/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 917 | Agreement | 9/23/2014 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 918 | Agreement | 10/8/2014 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 919 | Agreement | 10/6/2014 | Record Received from Third Party | | | | Third Party | | Public Interest |
| 920 | Agreement | 8/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 921 | Email | 4/20/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |

| Count | Document Type | Main Date | Title | People/Organizations From | People/Organizations To | People/Organizations CC | People/Organizations Between | People/Organizations Author | Privilege |
|-------|-----------------|------------|----------------------------------|--|-------------------------------------|---|------------------------------|-----------------------------|---|
| 922 | Business Record | 4/20/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 923 | Email | 10/15/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 924 | Email | 9/2/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 925 | Email | 9/23/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 926 | Business Record | 9/23/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 927 | Business Record | 11/13/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 928 | Business Record | 9/3/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 929 | Email | 4/30/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 930 | Letter | 4/30/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 931 | Email | 9/29/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 932 | Business Record | 5/20/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 933 | Letter | 9/29/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 934 | Email | 10/8/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 935 | Business Record | 7/3/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 936 | Business Record | 4/27/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 937 | Business Record | 4/27/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 938 | Business Record | 4/27/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 939 | Business Record | 11/11/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 940 | Business Record | 11/13/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 941 | Business Record | 7/6/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 942 | Business Record | 6/22/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 943 | Business Record | 6/22/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 944 | Business Record | 6/22/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 945 | Email | 8/30/2016 | Competition Bureau Record | Di Domenico, Antonio / Competition Bureau Legal Services | Rushton, Kevin / Competition Bureau | Charania, Majid / Competition Bureau Legal Services | | | Litigation Public Interest Solicitor Client |
| 946 | Business Record | 6/17/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 947 | Business Record | 5/25/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 948 | Email | 6/6/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 949 | Email | 4/7/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 950 | Letter | 4/7/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 951 | Business Record | 4/7/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 952 | Other External | 4/7/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 953 | Business Record | 4/4/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 954 | Business Record | 4/7/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 955 | Email | 7/9/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 956 | Email | 4/28/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 957 | Email | 9/4/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 958 | Business Record | 3/6/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 959 | Business Record | 11/2/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 960 | Business Record | 11/2/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 961 | Business Record | 11/3/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 962 | Business Record | 11/2/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 963 | Business_Plans | 9/26/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 964 | Business Record | 10/24/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 965 | Business Record | 10/26/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 966 | Business Record | 12/14/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 967 | Business Record | 12/14/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 968 | Business Record | 3/5/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 969 | Business Record | 3/5/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 970 | Business Record | 3/8/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 971 | Business Record | 12/19/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 972 | Business Record | 2/20/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |

| Count | Document Type | Main Date | Title | People/Organizations From | People/Organizations To | People/Organizations CC | People/Organizations Between | People/Organizations Author | Privilege |
|-------|-----------------|------------|----------------------------------|---------------------------|-------------------------|-------------------------|------------------------------|-----------------------------|-----------------|
| 973 | Business Record | 2/20/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 974 | Business Record | 2/20/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 975 | Business Record | 2/21/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 976 | Business Record | 6/3/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 977 | Business Record | 1/15/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 978 | Business Record | 11/14/2011 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 979 | Business Record | 2/13/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 980 | Business Record | 1/20/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 981 | Business Record | 1/13/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 982 | Business Record | 1/14/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 983 | Business Record | 11/1/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 984 | Business Record | 4/8/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 985 | Business Record | 4/4/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 986 | Business Record | 9/6/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 987 | Business Record | 2/21/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 988 | Business Record | 2/24/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 989 | Business Record | 2/27/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 990 | Business Record | 2/13/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 991 | Business Record | 2/13/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 992 | Business Record | 7/6/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 993 | Business Record | 6/24/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 994 | Business Record | 9/25/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 995 | Business Record | 9/26/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 996 | Business Record | 9/25/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 997 | Business Record | 7/18/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 998 | Business Record | 2/24/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 999 | Business Record | 2/20/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1000 | Business Record | 7/3/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1001 | Business Record | 5/15/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1002 | Business Record | 4/4/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1003 | Business Record | 4/29/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1004 | Business Record | 5/16/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1005 | Business Record | 2/10/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1006 | Business Record | 2/11/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1007 | Business Record | 2/27/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1008 | Business Record | 2/28/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1009 | Business Record | 2/10/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1010 | Business Record | 12/3/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1011 | Business Record | 5/30/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1012 | Business Record | 5/13/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1013 | Business Record | 5/21/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1014 | Business Record | 5/25/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1015 | Business Record | 5/27/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1016 | Business Record | 5/15/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1017 | Business Record | 9/28/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1018 | Business Record | 9/28/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1019 | Business Record | 9/28/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1020 | Business Record | 9/28/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1021 | Business Record | 9/28/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1022 | Business Record | 9/29/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1023 | Business Record | 3/18/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1024 | Business Record | 8/24/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |

| Count | Document Type | Main Date | Title | People/Organizations From | People/Organizations To | People/Organizations CC | People/Organizations Between | People/Organizations Author | Privilege |
|-------|-----------------|------------|----------------------------------|---------------------------|-------------------------|-------------------------|------------------------------|-----------------------------|-----------------|
| 1025 | Business Record | 7/16/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1026 | Business Record | 7/20/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1027 | Business Record | 7/21/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1028 | Business Record | 4/17/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1029 | Business Record | 4/21/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1030 | Business Record | 4/20/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1031 | Business Record | 4/17/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1032 | Business Record | 6/22/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1033 | Business Record | 6/22/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1034 | Business Record | 11/17/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1035 | Business Record | 10/20/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1036 | Business Record | 2/17/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1037 | Business Record | 3/23/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1038 | Business Record | 3/23/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1039 | Business Record | 9/10/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1040 | Business Record | 9/29/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1041 | Business Record | 7/10/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1042 | Business Record | 7/10/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1043 | Business Record | 1/21/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1044 | Business Record | 1/23/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1045 | Business_Plans | 4/17/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1046 | Business_Plans | 4/17/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1047 | Business_Plans | 4/17/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1048 | Business_Plans | 4/27/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1049 | Business Record | 4/20/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1050 | Business Record | 4/23/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1051 | Business Record | 4/30/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1052 | Business Record | 5/12/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1053 | Business Record | 2/12/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1054 | Business Record | 2/27/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1055 | Business Record | 2/27/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1056 | Business Record | 2/26/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1057 | Business Record | 3/4/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1058 | Business Record | 4/30/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1059 | Business Record | 5/26/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1060 | Business Record | 11/9/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1061 | Business Record | 8/4/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1062 | Business Record | 4/29/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1063 | Business Record | 6/15/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1064 | Business Record | 7/29/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1065 | Business Record | 3/26/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1066 | Business Record | 4/16/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1067 | Business Record | 4/22/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1068 | Business Record | 8/14/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1069 | Business Record | 11/21/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1070 | Business Record | 1/27/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1071 | Business Record | 6/20/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1072 | Business Record | 5/14/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1073 | Business Record | 1/14/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1074 | Business Record | 3/14/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1075 | Business Record | 1/23/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1076 | Business Record | 4/23/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |

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|-------|-----------------|------------|----------------------------------|---------------------------|-------------------------|-------------------------|------------------------------|-----------------------------|-----------------|
| 1077 | Business Record | 1/21/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1078 | Business Record | 2/21/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1079 | Business Record | 5/12/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1080 | Business Record | 8/11/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1081 | Business Record | 4/13/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1082 | Business Record | 6/16/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1083 | Business Record | 6/17/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1084 | Business Record | 6/14/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1085 | Business Record | 4/27/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1086 | Business Record | 9/23/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1087 | Business Record | 1/16/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1088 | Business Record | 4/4/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1089 | Email | 1/12/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 1090 | Letter | 10/13/2015 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 1091 | Business Record | 4/30/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1092 | Business Record | 5/1/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1093 | Business Record | 5/1/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1094 | Business Record | 12/7/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1095 | Business Record | 1/23/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1096 | Business Record | 2/2/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1097 | Business Record | 8/16/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1098 | Business Record | 4/26/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1099 | Business Record | 6/4/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1100 | Business Record | 8/17/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1101 | Business Record | 10/15/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1102 | Business Record | 10/8/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1103 | Business Record | 4/20/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1104 | Business Record | 6/6/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1105 | Business Record | 4/15/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1106 | Business Record | 3/25/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1107 | Business Record | 10/10/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1108 | Business Record | 10/14/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1109 | Business Record | 10/24/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1110 | Business Record | 11/24/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1111 | Business Record | 5/10/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1112 | Business_Plans | 6/17/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1113 | Business Record | 6/27/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1114 | Business Record | 12/10/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1115 | Presentation | 3/3/2011 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1116 | Business Record | 2/13/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1117 | Business Record | 2/27/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1118 | Business Record | 3/18/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1119 | Business Record | 5/28/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1120 | Business Record | 4/23/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1121 | Business Record | 8/16/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1122 | Business Record | 8/16/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1123 | Business Record | 8/16/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1124 | Business Record | 8/22/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1125 | Business Record | 12/13/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1126 | Business Record | 12/16/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1127 | Business Record | 5/23/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1128 | Business Record | 5/25/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |

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| 1129 | Business Record | 9/26/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1130 | Business Record | 9/28/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1131 | Business Record | 2/15/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1132 | Business Record | 8/9/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1133 | Business Record | 7/20/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1134 | Business Record | 12/14/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1135 | Business Record | 6/25/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1136 | Business Record | 6/28/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1137 | Business Record | 6/23/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1138 | Business Record | 3/20/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1139 | Business Record | 5/28/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1140 | Business Record | 9/26/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1141 | Business Record | 9/30/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1142 | Business Record | 9/30/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1143 | Business Record | 10/24/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1144 | Business Record | 10/26/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1145 | Business Record | 10/26/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1146 | Business Record | 10/29/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1147 | Business Record | 6/15/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1148 | Business Record | 2/18/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1149 | Business Record | 12/3/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1150 | Business Record | 3/10/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1151 | Business Record | 10/6/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1152 | Business Record | 9/25/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1153 | Business Record | 9/24/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1154 | Business Record | 10/14/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1155 | Business Record | 10/9/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1156 | Business Record | 10/14/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1157 | Business Record | 10/14/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1158 | Business Record | 10/14/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1159 | Business Record | 8/26/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1160 | Business Record | 2/19/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1161 | Business Record | 10/29/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1162 | Business Record | 4/28/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1163 | Business Record | 3/23/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1164 | Business Record | 3/19/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1165 | Business Record | 12/26/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1166 | Business Record | 3/31/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1167 | Business Record | 4/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1168 | Business Record | 4/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1169 | Business Record | 4/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1170 | Business Record | 3/24/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1171 | Business Record | 3/31/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1172 | Business Record | 2/11/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1173 | Business Record | 1/27/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1174 | Business Record | 2/7/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1175 | Business Record | 6/27/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1176 | Business Record | 1/10/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1177 | Business Record | 3/4/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1178 | Business Record | 9/8/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1179 | Business Record | 12/20/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1180 | Business Record | 9/13/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |

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| 1181 | Business Record | 9/15/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1182 | Business Record | 9/15/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1183 | Business Record | 9/11/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1184 | Business Record | 11/19/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1185 | Business Record | 11/19/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1186 | Business Record | 11/19/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1187 | Business Record | 9/23/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1188 | Business Record | 11/22/2011 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1189 | Business Record | 11/7/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1190 | Business Record | 9/13/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1191 | Business Record | 5/21/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1192 | Business Record | 6/19/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1193 | Business Record | 6/19/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1194 | Business Record | 8/18/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1195 | Business Record | 7/19/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1196 | Business Record | 7/19/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1197 | Business Record | 1/27/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1198 | Business Record | 5/22/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1199 | Business Record | 6/5/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1200 | Business Record | 9/13/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1201 | Business Record | 5/31/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1202 | Business Record | 2/26/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1203 | Business Record | 2/26/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1204 | Business Record | 2/25/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1205 | Business Record | 6/5/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1206 | Business Record | 5/22/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1207 | Business Record | 5/23/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1208 | Business Record | 7/2/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1209 | Business Record | 4/12/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1210 | Business Record | 4/26/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1211 | Business Record | 4/26/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1212 | Business Record | 12/16/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1213 | Business Record | 2/11/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1214 | Business Record | 9/17/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1215 | Business Record | 8/15/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1216 | Business Record | 5/13/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1217 | Business Record | 4/30/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1218 | Business Record | 4/10/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1219 | Business Record | 11/7/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1220 | Business Record | 10/19/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1221 | Business Record | 11/4/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1222 | Business Record | 3/29/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1223 | Business Record | 6/14/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1224 | Business Record | 6/15/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1225 | Business Record | 7/10/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1226 | Business Record | 7/10/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1227 | Business Record | 10/29/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1228 | Business Record | 10/23/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1229 | Business Record | 10/25/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1230 | Business Record | 4/16/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1231 | Business Record | 10/3/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1232 | Business Record | 7/20/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |

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| 1233 | Business Record | 7/17/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1234 | Business Record | 5/28/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1235 | Business Record | 4/5/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1236 | Business Record | 7/27/2011 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1237 | Business Record | 4/16/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1238 | Business Record | 8/17/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1239 | Business Record | 7/23/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1240 | Business Record | 4/16/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1241 | Business Record | 9/25/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1242 | Business Record | 3/18/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1243 | Business Record | 4/15/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1244 | Business Record | 4/16/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1245 | Business Record | 4/16/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1246 | Business Record | 4/16/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1247 | Business Record | 9/3/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1248 | Letter | 12/7/2015 | Record Received from Third Party | Third Party | Di Domenico, Antonio / Competition Bureau Legal Services | Third Party Horn, Michael / Competition Bureau Legal Services Rushton, Kevin / Competition Bureau | | | Public Interest |
| 1249 | Email | 1/6/2016 | Record Received from Third Party | Third Party | Di Domenico, Antonio / Competition Bureau Legal Services Horn, Michael / Competition Bureau Legal Services Rushton, Kevin / Competition Bureau | Third Party | | | Public Interest |
| 1250 | Letter | 1/6/2016 | Record Received from Third Party | Third Party | Di Domenico, Antonio / Competition Bureau Legal Services | Third Party Horn, Michael / Competition Bureau Legal Services | | | Public Interest |
| 1251 | Affidavit | 1/6/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1252 | Business Record | 1/6/2016 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1253 | Email | 8/7/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 1254 | Email | 8/7/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 1255 | Email | 1/9/2015 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 1256 | Email | 8/7/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 1257 | Email | 8/7/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 1258 | Business Record | 11/13/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1259 | Business Record | 12/10/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1260 | Business Record | 12/10/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1261 | Affidavit | 12/17/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1262 | Business Record | 12/31/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1263 | Business Record | 12/31/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1264 | Business Record | 12/31/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1265 | Business Record | 12/12/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1266 | Business Record | 8/12/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1267 | Business Record | 4/7/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1268 | Business Record | 5/7/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1269 | Business Record | 8/15/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1270 | Business Record | 3/19/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1271 | Business Record | 11/15/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1272 | Business Record | 8/12/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1273 | Business Record | 11/15/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1274 | Business Record | 5/7/2015 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1275 | Business Record | 8/15/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1276 | Business Record | 4/7/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1277 | Business Record | 7/23/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1278 | Business Record | 8/13/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |

| Count | Document Type | Main Date | Title | People/Organizations From | People/Organizations To | People/Organizations CC | People/Organizations Between | People/Organizations Author | Privilege |
|-------|-----------------|-----------|----------------------------------|-----------------------------|---|--|------------------------------|-----------------------------|-------------------------------|
| 1383 | Business Record | 1/1/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1384 | Business Record | 1/1/2014 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1385 | Business Record | 1/1/2012 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1386 | Business Record | 1/1/2013 | Record Received from Third Party | | | | | Third Party | Public Interest |
| 1387 | Letter | 1/6/2016 | Record Received from Third Party | Third Party | Horn, Michael / Competition Bureau Legal Services | Third Party | | | Public Interest |
| 1388 | Email | 12/1/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 1389 | Email | 12/2/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 1390 | Email | 12/2/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Public Interest |
| 1391 | Email | 12/2/2014 | Record Received from Third Party | Third Party | Third Party | | | | Public Interest |
| 1392 | Email | 8/18/2016 | Record Received from Third Party | Third Party | Rushton, Kevin / Competition Bureau | Di Domenico, Antonio / Competition Bureau Legal Services Majid Charania / Competition Bureau Legal Services | | | Litigation Public Interest |
| 1393 | Email | | Record Received from Third Party | Vancouver Airport Authority | Vancouver Airport Authority Third Party | | | | Public Interest |

4

CT-2016-15

FEDERAL COURT

IN THE MATTER OF the *Competition Act*, R.S.C. 1985, c. C-34, as amended;

AND IN THE MATTER OF certain conduct of Vancouver Airport Authority relating to the supply of in-flight catering at Vancouver International Airport;

AND IN THE MATTER OF an application by the Commissioner of Competition for one or more orders pursuant to section 79 of the *Competition Act*.

BETWEEN:

COMMISSIONER OF COMPETITION

Applicant

– and –

VANCOUVER AIRPORT AUTHORITY

Respondent


**SUPPLEMENTAL AFFIDAVIT OF DOCUMENTS NO. 1
OF THE COMMISSIONER OF COMPETITION
AFFIRMED 27 APRIL 2017**

I, **KEVIN RUSHTON**, of the Town of Carleton Place, in the Province of Ontario, solemnly affirm that:

1. I am Acting Major Case Director and Strategic Policy Advisor with the Competition Bureau. I am an authorized representative of the Commissioner of Competition (the "**Commissioner**") for the purpose of this affidavit.
2. I have participated in and overseen a review of the Commissioner's potentially relevant records and have made appropriate inquiries of others to inform myself in order to make this affidavit.
3. I make this affidavit further to the Affidavit of Documents of the Commissioner of Competition affirmed 14 February 2017 and the Amended Affidavit of Documents of the Commissioner of Competition affirmed 21 March 2017, each of which in respect of this Application.
4. This affidavit discloses, to the full extent of my knowledge, information and belief, all of the records relevant to matters in issue in this Application that are in the possession, power or control of the Commissioner for the period 1 January 2017 through 28 February 2017. In respect of this time period, the Commissioner has never had in his possession, power or control any records relevant to any matter in issue in this Application that were or are no longer in the possession, power or control of the Commissioner.
5. I have listed and described in **Schedule B** to this affidavit the relevant records that are in the Commissioner's possession, power or control that contain confidential information and for which no privilege is claimed or for which the Commissioner waives privilege for the purpose of this Application.

6. I have listed and described in **Schedule C** to this affidavit the relevant records that are in the Commissioner's possession, power or control that contain confidential information and for which, at this time, privilege is claimed by the Commissioner, including the grounds for each such claim.
7. I will continue to oversee the review of any potentially relevant records that the Commissioner has come to possess after 28 February 2017 and provide one or more supplemental affidavits of documents as appropriate.

AFFIRMED BEFORE ME at the City of Gatineau in the Province of Québec this 27th day of April 2017.



A Commissioner for Taking Oaths
Katherine Rydel 58143I



Kevin Rushton

B

The document at this Tab 4B is confidential and was removed from the Public Version of this Motion Record pursuant to the Confidentiality Order of Justice Gascon dated March 20, 2017.

C

Commissioner of Competition v. Vancouver Airport Authority
 Supplemental Affidavit of Documents No. 1 of the Commissioner of Competition
 Schedule C

THIS IS EXHIBIT C TO THE
 AFFIDAVIT OF K. Rushton

SWORN BEFORE ME THIS 27th DAY
 OF April 2017

K. Pydal
 COMMISSIONER FOR OATHS

In this Schedule:

"Solicitor Client" means solicitor-client privilege; the privilege attaching to records that constitute, contain, record or reflect confidential communications passing between a client, or an expert retained by or on behalf of a client, and the client's solicitors, where the communications were made in the course of obtaining or providing legal advice and the solicitors were acting in a professional capacity as solicitors

"Litigation" means litigation privilege; the privilege attaching to:
 (i) records of any kind or description and copies thereof prepared for the purpose of asking for or receiving advice concerning pending or reasonably anticipated litigation;
 (ii) records of any kind or description and copies thereof prepared for the purpose of obtaining or providing information or evidence to be used in pending or reasonably anticipated litigation; and
 (iii) records of any kind or description and copies thereof prepared for the purpose of preparing for or prosecuting pending or reasonably anticipated litigation

"Public Interest" means public interest privilege; the privilege attaching to records of any kind or description and copies thereof, including records to which the confidentiality provisions of the Competition Act apply, created or obtained by the Applicant, its employees, servants, agents or solicitors, or obtained from third parties during the Applicant's investigations

| Count | Document Type | Main Date | Title | People/Organizations From | People/Organizations To | People/Organizations CC | People/Organizations Between | People/Organizations Author | Privilege |
|-------|-----------------|------------|----------------------------------|---------------------------|-------------------------|-------------------------|------------------------------|--|-------------------------------|
| 1 | Notebook | 18/01/2017 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 2 | Notebook | 07/02/2017 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 3 | Notebook | 18/01/2017 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 4 | Notebook | 07/02/2017 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 5 | Notebook | 22/02/2017 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 6 | Notebook | 22/02/2017 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 7 | Notebook | 22/02/2017 | Competition Bureau Record | | | | | Bergeron, Francis / Competition Bureau | Litigation Public Interest |
| 8 | Notebook | 22/02/2017 | Competition Bureau Record | | | | | Parson, Conor / Competition Bureau | Litigation Public Interest |
| 9 | Notebook | 18/01/2017 | Competition Bureau Record | | | | | Lamoureux, Alex / Competition Bureau | Litigation Public Interest |
| 10 | Other Internal | 11/01/2017 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 11 | Expert Document | 19/01/2017 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 12 | Other Internal | 27/01/2017 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 13 | Other Internal | 27/01/2017 | Competition Bureau Record | | | | | Rushton, Kevin / Competition Bureau | Litigation Public Interest |
| 14 | Other External | 12/01/2017 | Record Received from Third Party | | | | | Third Party | Litigation |
| 15 | Interview Notes | 30/01/2017 | Competition Bureau Record | | | | | Earnshaw, Emily / Competition Bureau | Litigation Public Interest |
| 16 | Other External | 16/01/2017 | Record Received from Third Party | | | | | Third Party | Litigation |
| 17 | Other External | 16/01/2017 | Record Received from Third Party | | | | | Third Party | Litigation |
| 18 | Other External | 16/01/2017 | Record Received from Third Party | | | | | Third Party | Litigation |
| 19 | Expert Document | 27/01/2017 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 20 | Reports | 09/03/2016 | Record Received from Third Party | | | | | Third Party | Litigation |

| Count | Document Type | Main Date | Title | People/Organizations From | People/Organizations To | People/Organizations CC | People/Organizations Between | People/Organizations Author | Privilege |
|-------|-------------------|------------|----------------------------------|-------------------------------------|--|--|------------------------------|--------------------------------------|-------------------------------|
| 21 | Other External | 12/08/2016 | Record Received from Third Party | | | | | Third Party | Litigation |
| 22 | Other External | 22/12/2016 | Record Received from Third Party | | | | | Third Party | Litigation |
| 23 | Other External | 29/12/2016 | Record Received from Third Party | | | | | Third Party | Litigation |
| 24 | Other External | 24/10/2016 | Record Received from Third Party | | | | | Third Party | Litigation |
| 25 | Other External | 17/10/2016 | Record Received from Third Party | | | | | Third Party | Litigation |
| 26 | Other External | 17/01/2017 | Record Received from Third Party | | | | | Third Party | Litigation |
| 27 | Other External | 05/01/2017 | Record Received from Third Party | | | | | Third Party | Litigation |
| 28 | Other External | 06/01/2017 | Record Received from Third Party | | | | | Third Party | Litigation |
| 29 | Other External | 06/01/2017 | Record Received from Third Party | | | | | Third Party | Litigation |
| 30 | Other External | 16/01/2017 | Record Received from Third Party | | | | | Third Party | Litigation |
| 31 | Email | 08/02/2017 | Competition Bureau Record | Rushton, Kevin / Competition Bureau | Fisher, Melissa / Competition Bureau Magro, Mark / Competition Bureau | Foster, Alicia / Competition Bureau McWhinnie, Krista / Competition Bureau | | | Litigation Public Interest |
| 32 | Reports | 03/02/2017 | Record Received from Third Party | | | | | Third Party | Litigation |
| 33 | Interview Notes | 07/02/2017 | Competition Bureau Record | | | | | Foster, Alicia / Competition Bureau | Litigation Public Interest |
| 34 | Other External | 06/01/2017 | Record Received from Third Party | | | | | Third Party | Litigation |
| 35 | Interview Notes | 22/02/2017 | Competition Bureau Record | | | | | Earnshaw, Emily / Competition Bureau | Litigation Public Interest |
| 36 | Affidavit | 27/01/2017 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 37 | Excel Spreadsheet | 25/01/2017 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 38 | Excel Spreadsheet | 25/01/2017 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 39 | Email | 25/08/2014 | Record Received from Third Party | Third Party | Third Party | Third Party | | | Litigation Public Interest |
| 40 | Other External | 22/02/2017 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 41 | Other External | 22/02/2017 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 42 | Other External | 22/02/2017 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 43 | Other External | 22/02/2017 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 44 | Email | 13/02/2017 | Record Received from Third Party | Third Party | Hood, Jonathan / Competition Bureau Legal Services Rushton, Kevin / Competition Bureau | | | | Litigation Public Interest |
| 45 | Agreement | 03/11/2014 | Record Received from Third Party | | | | Third Party | | Litigation Public Interest |
| 46 | Email | 13/02/2017 | Record Received from Third Party | Third Party | Rushton, Kevin / Competition Bureau | | | | Litigation Public Interest |
| 47 | Business Record | 01/01/2017 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 48 | Other External | | Record Received from Third Party | | | | | Vancouver Airport Authority | Litigation Public Interest |
| 49 | Agreement | 16/05/2016 | Record Received from Third Party | | | | Third Party | | Litigation Public Interest |
| 50 | Agreement | 16/05/2016 | Record Received from Third Party | | | | Third Party | | Litigation Public Interest |
| 51 | Email | 23/01/2017 | Record Received from Third Party | Third Party | Hood, Jonathan / Competition Bureau Legal Services | Caron, Ryan / Competition Bureau Legal Services Foster, Alicia / Competition Bureau Rushton, Kevin / Competition Bureau Rydel, Katherine / Competition Bureau Legal Services Third Party | | | Litigation Public Interest |
| 52 | Letter | | Record Received from Third Party | Third Party | Vancouver Airport Authority | Third Party | | | Litigation Public Interest |
| 53 | Business Record | 31/12/2015 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 54 | Business Record | 10/05/2016 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 55 | Business Record | 10/05/2016 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |

| Count | Document Type | Main Date | Title | People/Organizations From | People/Organizations To | People/Organizations CC | People/Organizations Between | People/Organizations Author | Privilege |
|-------|-----------------|------------|----------------------------------|---------------------------|-------------------------|-------------------------|------------------------------|-----------------------------|-------------------------------|
| 56 | Business Record | 18/05/2015 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 57 | Business Record | 08/11/2016 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 58 | Business Record | 08/11/2016 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 59 | Business Record | 18/11/2015 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 60 | Business Record | 10/05/2016 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 61 | Business Record | 10/05/2016 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 62 | Business Record | 14/01/2016 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 63 | Business Record | 17/12/2015 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 64 | Business Record | 18/01/2016 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 65 | Business Record | 15/12/2015 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |
| 66 | Presentation | 20/01/2016 | Record Received from Third Party | | | | | Third Party | Litigation Public Interest |

5

The document at this Tab 5 is confidential and was removed from the Public Version of this Motion Record pursuant to the Confidentiality Order of Justice Gascon dated March 20, 2017.

6

The document at this Tab 6 is confidential and was removed from the Public Version of this Motion Record pursuant to the Confidentiality Order of Justice Gascon dated March 20, 2017.

7

CT-2016-015

THE COMPETITION TRIBUNAL

IN THE MATTER OF the *Competition Act*, R.S.C. 1985, c. C-34, as amended;

AND IN THE MATTER OF certain conduct of Vancouver Airport Authority relating to the supply of in-flight catering at Vancouver International Airport;

AND IN THE MATTER OF an application by the Commissioner of Competition for one or more orders pursuant to section 79 of the *Competition Act*.

BETWEEN:

| | |
|---|-----|
| COMPETITION TRIBUNAL TRIBUNAL DE LA CONCURRENCE FILED / PRODUIT CT-2016-015 September 29, 2016 Jos LaRose for / pour REGISTRAR / REGISTRARIAIRE | |
| OTTAWA, ONT | # 1 |

COMMISSIONER OF COMPETITION

Applicant

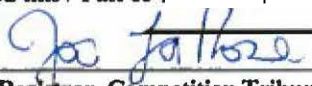
– and –

VANCOUVER AIRPORT AUTHORITY

Respondent

**I hereby certify this to be a true copy of the original document/
Je certifie par la présente que ceci est une copie conforme au document original**

Dated this / Fait ce 29th of September 2016


**For Registrar, Competition Tribunal /
Pour Registrariaire, Tribunal de la concurrence**

NOTICE OF APPLICATION

TAKE NOTICE that the Applicant, the Commissioner of Competition (the “Commissioner”), will make an application to the Competition Tribunal (the “Tribunal”), on a day and place to be determined by the Tribunal, pursuant to section 79 of the *Competition Act*, R.S.C. 1985, c. C-34, as amended (the “Act”), for:

- (a) an order pursuant to subsections 79(1) and 79(2) of the Act:
 - (i) prohibiting the Respondent, Vancouver Airport Authority (“**VAA**”), from directly or indirectly engaging in the practice of anti-competitive acts set out in the Statement of Grounds and Material Facts (“**SGMF**”), below;
 - (ii) requiring VAA to issue authorization, on non-discriminatory terms, to any firm that meets customary health, safety, security and performance requirements, so as to entitle that firm to access the airside at Vancouver International Airport (the “**Airport**”), from one or more facilities used by the firm whether located on Airport property or off Airport property, for the purposes of supplying Galley Handling (defined in paragraph 12 of the SGMF); and
 - (iii) otherwise requiring VAA to take any action, or to refrain from taking any action, as may be required to give effect to the foregoing prohibitions and requirements;
- (b) an order directing VAA to pay costs;
- (c) an order directing VAA to establish, and thereafter maintain, a corporate compliance program consistent with the Commissioner’s bulletin entitled “Corporate Compliance Programs”, as such bulletin may be revised from time-to-time; and
- (d) such further and other relief as the Commissioner may request and this Tribunal may consider appropriate.

AND TAKE NOTICE that if you do not file a response with the Registrar of the Tribunal within 45 days of the date upon which this Application is served upon you, the Tribunal may, upon application by the Commissioner and without further

notice, make such order or orders as it may consider just, including the orders sought in this Application.

AND TAKE FURTHER NOTICE that the Commissioner will rely on the SGMF in support of this Application and on such further or other material as counsel may advise and the Tribunal may permit.

AND TAKE FURTHER NOTICE that a concise statement of the economic theory of the case is attached as Schedule “A” to the SGMF.

THE ADDRESSES FOR SERVICE ARE:

For Vancouver Airport Authority:

Goodmans LLP
 Bay Adelaide Centre
 333 Bay Street, Suite 3400
 Toronto, ON M5H 2S7
 Tel: 416.979.2211
 Fax: 416.979.1234

Attention: Calvin S. Goldman, Q.C.
 Michael Koch
 Richard Annan

For Commissioner of Competition:

Department of Justice Canada
 Competition Bureau Legal Services
 Place du Portage, Phase I
 50 Victoria Street, 22nd Floor
 Tel.: 819.994.7714
 Fax: 819.953.9267

Attention: Antonio Di Domenico
 Jonathan Hood
 Katherine Rydel
 Ryan Caron

The Applicant proposes that the hearing of this matter be held in the City of Ottawa, Ontario and be heard in English. The Applicant proposes that documents be filed electronically.

STATEMENT OF GROUNDS AND MATERIAL FACTS

I. OVERVIEW AND GROUNDS

1. The Vancouver Airport Authority has abused its dominant market position by excluding and denying the benefits of competition to the In-flight Catering marketplace at Vancouver International Airport. It has no legitimate explanation to justify the substantial prevention or lessening of competition that has resulted in higher prices, dampened innovation and lower service quality.
2. New-entrant firms have sought, and continue to seek, to provide In-flight Catering, comprising Catering and Galley Handling (each as defined in paragraph 12, below), at the Airport. Airlines operating commercial passenger air transportation services wish to procure In-flight Catering at the Airport from these new-entrant firms, to realize substantial cost savings and other benefits. Standing as a wall between these buyers and sellers of In-flight Catering is VAA.
3. VAA substantially or completely controls the market for access to the airside at the Airport for the supply of Galley Handling. Without VAA's authorization to access the airside, firms cannot supply Galley Handling at the Airport. VAA thus also substantially or completely controls the market for the supply of Galley Handling at the Airport.
4. Despite repeated requests from new-entrant firms seeking to provide In-flight Catering at the Airport, and unlike other airport authorities in Canada, VAA unjustifiably refuses to authorize their access to the airside. VAA also requires firms providing In-flight Catering at the Airport to lease land from VAA for the operation of Catering kitchen facilities, as a condition of

authorizing access to the airside. VAA's conduct is a practice of anti-competitive acts, the purpose and effect of which is to exclude new-entrant firms from providing In-flight Catering or Galley Handling at the Airport.

5. VAA's practice with respect to airside access for the supply of Galley Handling has had, is having and is likely to have the effect of preventing or lessening competition substantially in the market for the supply of Galley Handling at the Airport. But for VAA's practice, the market for the supply of Galley Handling at the Airport would be substantially more competitive, including by way of lower prices, enhanced innovation and/or more efficient business models, and higher service quality.
6. Ultimately, what the Commissioner seeks in this case is to maintain and encourage competition, by allowing airlines and In-flight Catering firms that wish to do business with each other to do so, such that all In-flight Catering firms – both incumbents and new-entrants – are afforded an opportunity to succeed or fail on the basis of their respective ability to compete. In these circumstances, an order of the Tribunal is necessary and appropriate.

II. THE PARTIES

A. THE COMMISSIONER

7. The Applicant, the Commissioner, is an officer appointed by the Governor in Council pursuant to section 7 of the Act and is responsible for the administration and enforcement of the Act.

B. VAA

8. The Respondent, VAA, is a not-for-profit corporation continued under the *Canada Not-for-profit Corporations Act*. VAA operates the Airport pursuant to a Ground Lease entered into in 1992 with the Government of

Canada, as represented by the Minister of Transport (the “**Ground Lease**”).

9. In the fiscal year ended 31 December 2014, VAA generated consolidated revenue of \$465.6 million, and had an excess of revenue over expenses for the year of \$105.6 million. In the fiscal year ended 31 December 2015, VAA generated consolidated revenue of \$485.5 million, and had an excess of revenue over expenses of \$131.5 million.

III. **VAA HAS ABUSED A DOMINANT MARKET POSITION, IN CONTRAVENTION OF SECTION 79 OF THE ACT**

10. VAA has engaged in and continues to engage in an abuse of a dominant market position relating to the supply of In-flight Catering at the Airport.

A. **VAA SUBSTANTIALLY OR COMPLETELY CONTROLS THE MARKET FOR AIRPORT AIRSIDE ACCESS FOR THE SUPPLY OF GALLEY HANDLING, AS WELL AS THE MARKET FOR GALLEY HANDLING AT THE AIRPORT**

(i) Relevant Markets

11. Two markets are relevant for purposes of the Commissioner’s Application – the market for the supply of Galley Handling at the Airport, and the market for Airport airside access for the supply of Galley Handling.

Market for the Supply of Galley Handling at the Airport

12. **In-flight Catering** comprises two principal bundles of products and services purchased by airlines operating commercial passenger air transportation services – Catering and Galley Handling. **Catering** consists primarily of the preparation of meals for distribution, consumption or use on-board a commercial aircraft by passengers and crew, and includes buy-on-board offerings and snacks. **Galley Handling** consists primarily of the loading and unloading of Catering, commissary products (typically non-food items and non-perishable food items) and ancillary products

- (such as duty-free products, linen and newspapers) on a commercial aircraft, including in relation thereto: warehousing; inventory management; assembly of meal trays and aircraft trolley carts (including bar and boutique assembly); transportation of Catering, commissary and ancillary products between aircraft and warehouse or Catering kitchen facilities; equipment cleaning; handheld point-of-sale device management; and trash removal.
13. Historically, both Catering and Galley Handling have been provided in Canada by full-service In-flight Catering firms, namely Gate Gourmet Canada Inc. ("**Gate Gourmet**"), at most airports nationally, and CLS Catering Services Ltd. ("**CLS**"), in Toronto and Vancouver. In 2009, another full-service In-flight Catering firm, Newrest Servair Holding Canada Inc., began operating in Canada, and is now present in Calgary, Montreal and Toronto.
 14. The way in which In-flight Catering is provided in Canada has changed in recent years, as airlines have sought to reduce costs, including the cost of In-flight Catering. Freshly-prepared meals, once served to all passengers, are now largely reserved for those travelling in business or first class. In their place, economy class passengers are increasingly served lower-cost frozen meals, sourced in many cases on a national basis from foodservice firms.
 15. With airline demand driving change in In-flight Catering service requirements, Catering and Galley Handling can be, and are, provided by separate firms. Today, a variety of firms specialize in Catering, such as by manufacturing large volumes of frozen meals, or by sourcing freshly-prepared meals from local restaurants proximate to airports. Other firms specialize in Galley Handling, such as by leveraging their existing airport infrastructure or expertise. Catering products are delivered to Galley

- Handling firms or full-service In-flight Catering firms, which, as part of their suite of Galley Handling services, load the meals onto aircraft. The separate supply of Catering and Galley Handling can deliver efficiencies to service providers and savings to airline customers.
16. Airlines periodically select a provider of In-flight Catering (or Catering or Galley Handling), principally based on price and service. Airlines can, and do, obtain In-flight Catering from different service providers at different airports. At some airports, the value proposition to an airline can be enhanced by the generally lower-cost “off-airport” location of the In-flight Catering firm, on land not leased from the airport authority. Airlines may select an In-flight Catering firm not presently serving a particular airport, conditional on that firm obtaining authorization from the airport authority to provide service at the airport.
 17. Airlines have the option of self-supplying all or a portion of their In-flight Catering needs. This includes so-called “double catering”, or transporting extra meals and ancillary supplies from one airport for service during a flight departing a second airport. Self-supply, including double catering, is not a feasible or preferable substitute for In-flight Catering for most airlines in Canada, including for logistical and financial reasons.
 18. Galley Handling constitutes a relevant product market. The relevant sellers or suppliers in this market are Galley Handling or In-flight Catering firms, while the relevant purchasers are airlines operating commercial passenger air transportation services.
 19. A sole profit-maximizing seller (*i.e.*, a hypothetical monopolist) would profitably impose and sustain a small but significant and non-transitory increase in price in the sale or supply of Galley Handling. For the vast

majority of airlines, there are no acceptable substitutes to the purchase of Galley Handling.

20. The Airport is the relevant geographic market for the sale or supply of Galley Handling. For the vast majority of airlines, there are no acceptable substitutes to the purchase of Galley Handling at the Airport.
21. One relevant market is therefore the supply of Galley Handling at the Airport.

Market for Airport Airside Access for the Supply of Galley Handling

22. Access to the airside is required to provide Galley Handling at an airport. The airside generally comprises that portion of an airport's property that lies inside the security perimeter. It includes runways and taxiways, as well as the apron, where, among other things, an aircraft is parked, Catering products and ancillary supplies, as well as baggage and cargo, are loaded and unloaded, and passengers board.
23. Airport authorities are the only entities in Canada from which a Galley Handling or In-flight Catering firm may obtain authorization to access the airside. Typically, airport authorities grant access to the airside by way of agreements or arrangements. Under the terms of these agreements or arrangements, firms generally pay a fee to the airport authority in exchange for authorization to access the airside to provide Galley Handling. The fee is commonly set as a percentage of the gross revenue generated by a firm from supplying Catering or Galley Handling at or from the airport. In-flight Catering firms usually pass on all or a part of this airport charge as a "port fee" to their airline customers.
24. Access to the airside for the supply of Galley Handling also constitutes a relevant product market. The relevant sellers or suppliers in this market

are airport authorities, while the relevant purchasers are Galley Handling or In-flight Catering firms.

25. A sole profit-maximizing seller (*i.e.*, a hypothetical monopolist) would profitably impose and sustain a small but significant and non-transitory increase in price in the sale or supply of access to the airside for the supply of Galley Handling. There are no acceptable substitutes to access to the airside for the supply of Galley Handling.
26. The Airport is the relevant geographic market for the sale or supply of access to the airside for the supply of Galley Handling. There are no acceptable substitutes to access to the airside at the Airport for the supply of Galley Handling.
27. A second relevant market is therefore access to the Airport airside for the supply of Galley Handling.

(ii) VAA Substantially or Completely Controls the Relevant Markets

28. VAA substantially or completely controls the market for access to the Airport airside for the supply of Galley Handling, as well as the market for the supply of Galley Handling at the Airport.

Market for Airport Airside Access for the Supply of Galley Handling

29. VAA has a substantial degree of market power in the market for access to the Airport airside for the supply of Galley Handling.
30. VAA is a monopolist in the market for access to the Airport airside for the supply of Galley Handling. VAA is the only entity from which a Galley Handling or In-flight Catering firm may obtain access to the Airport airside; there are no other sellers or suppliers of access to the Airport airside.

31. Barriers to entry and expansion in the market for access to the Airport airside for the supply of Galley Handling are absolute. No entity other than VAA may sell or supply access to the Airport airside. Entry of an alternative source of supply of access to the Airport airside simply is not possible.
32. VAA is generally able to dictate the terms upon which it sells or supplies access to the Airport airside for the supply of Galley Handling. For example, in 2010-2011, VAA was able to impose and sustain a more than 40% increase in the fee it charges firms under Airport airside access agreements to provide In-flight Catering at the Airport. Similarly, VAA is able to require firms providing In-flight Catering Services at the Airport to lease land from VAA for the operation of Catering kitchen facilities, as a condition of authorizing access to the Airport airside (as explained in greater detail at paragraph 42, below).
33. VAA's substantial degree of market power in the market for access to the Airport airside for the supply of Galley Handling is not constrained by Galley Handling or In-flight Catering firms or otherwise.

Market for the Supply of Galley Handling at the Airport

34. By virtue of its control over access to the Airport airside – a necessary input to the supply of Galley Handling – VAA also has a substantial degree of market power in the market for the supply of Galley Handling at the Airport.
35. VAA has considerable latitude to determine or influence price and non-price dimensions of competition in the market for the supply of Galley Handling at the Airport, including the terms upon which Galley Handling and In-flight Catering firms carry on business in this market. For example, VAA has the power to exclude, and has excluded, new-entrant Galley

Handling and In-flight Catering firms from supplying services at the Airport, by refusing to grant those firms access to the Airport airside.

B. VAA’S REFUSAL TO GRANT AIRSIDE ACCESS TO ADDITIONAL IN-FLIGHT CATERERS AND ITS TYING OF AIRSIDE ACCESS TO LAND LEASING IS A PRACTICE OF ANTI-COMPETITIVE ACTS

36. VAA has engaged in and is engaging in a practice of anti-competitive acts (the “**Practice**”) through: (i) its ongoing refusal to grant access to the Airport airside to new-entrant firms for the supply of Galley Handling at the Airport; and (ii) its continued tying of access to the Airport airside for the supply of Galley Handling to the leasing of Airport land from VAA for the operation of Catering kitchen facilities. The purpose and effect of VAA’s Practice is an intended negative effect on competitors that is exclusionary.

(i) VAA’s Refusal to Grant Airside Access to Additional In-flight Caterers

37. Gate Gourmet and CLS are currently the only firms authorized by VAA to provide In-flight Catering at the Airport. They (or their predecessors) have operated at the Airport since at least 1992, when VAA entered into the Ground Lease with the Government of Canada. VAA has never conducted a request for proposals or similar competitive process to select one or more firms to supply Galley Handling and/or Catering at the Airport, and has no immediate plans to do so. As such, no new entry in the In-flight Catering marketplace at the Airport has occurred in more than 20 years. The businesses of Gate Gourmet and CLS at the Airport are profitable.

38. In 2014, VAA refused requests from two new-entrant firms for authorization to access the airside to provide In-flight Catering at the Airport. While these firms would be new entrants to the In-flight Catering marketplace in Vancouver, they are both well-established businesses that

provide In-flight Catering at other airports in Canada. In this regard, airport authorities in Edmonton, Calgary, Regina, Winnipeg, Ottawa, Toronto, Montreal and Halifax have granted one or more of these firms access to the airside at airports in those cities.

39. Today, VAA continues to refuse to permit anyone other than Gate Gourmet and CLS to provide In-flight Catering at the Airport. VAA does so over the objections of several airlines, which have expressed to VAA their desire to see greater In-flight Catering competition at the Airport.
40. VAA has consistently and purposely intended to exclude new-entrant firms from the market for the supply of Galley Handling at the Airport, by refusing to grant such firms access to the Airport airside. Since access to the Airport airside is required to supply Galley Handling at the Airport, it was and is reasonably foreseeable or expected that the effect of VAA's refusal to grant access to the airside to new-entrant firms for the supply of Galley Handling would be an exclusionary effect on those firms. In fact, VAA's ongoing refusal to grant airside access to new-entrant In-flight Catering firms has resulted in the total and complete exclusion of such firms from the Airport.
41. VAA's refusal to grant access to the Airport airside to new-entrant firms for the supply of Galley Handling at the Airport has negatively impacted the businesses of excluded firms, including by way of lost contracts with airlines, reduced revenues, higher costs and delayed entry and expansion in Canada.

(ii) VAA's Tying of Airside Access to Land Leasing

42. In addition to its outright refusal to authorize new-entrant firms to access the airside to provide Galley Handling or In-flight Catering at the Airport, VAA's practice with respect to incumbent providers of In-flight Catering at

the Airport has been to tie their authorization to access the Airport airside for the supply of Galley Handling to their leasing of Airport land from VAA for the operation of Catering kitchen facilities. In other words, VAA does not permit a firm to access the Airport airside for the supply of Galley Handling if that firm does not operate a Catering kitchen located on Airport property (i.e., if the firm's kitchen were to be located on land not managed by VAA). VAA's airside access agreements with Gate Gourmet and CLS terminate if and when Gate Gourmet or CLS ceases to rent land from VAA for the operation of Catering kitchens on Airport property.

43. VAA has consistently and purposely intended to exclude new-entrant firms from the market for the supply of Galley Handling at the Airport by requiring that any firms accessing the airside to supply Galley Handling also lease Airport land for the operation of Catering kitchen facilities. It was and is reasonably foreseeable or expected that the effect of VAA's tying, of access to the Airport airside for the supply of Galley Handling to the leasing of Airport land from VAA for the operation of Catering kitchen facilities, would be an exclusionary effect on competitors. In-flight Catering firms are not permitted to locate their Catering kitchens on less expensive off-Airport land, and firms that may wish to provide only Galley Handling are excluded from operating at the Airport altogether.
44. VAA's tying of Airport airside access to the leasing of Airport land for the operation of Catering kitchens has negatively impacted the businesses of excluded firms, including by way of lost contracts with airlines, reduced revenues, higher costs and delayed entry and expansion in Canada.

(iii) VAA's Competitive Interest in Excluding Competition

45. VAA has a competitive interest in the market for the supply of Galley Handling at the Airport, and in insulating the incumbent In-flight Catering firms at the Airport from new sources of competition.
46. Each of Gate Gourmet and CLS rents land from VAA, pursuant to lease agreements, for the operation of Catering kitchens located on Airport property. Gate Gourmet and CLS pay VAA several million dollars per year, representing rent payments under these lease agreements, as well as fees under airside access agreements. In recent years, VAA has increased both the land lease rates and the amount of the percentage-based airside access fee it charges to Gate Gourmet and CLS.
47. VAA thus shares in the revenue generated from the supply of Galley Handling and In-flight Catering at or from the Airport, and benefits financially, through the lease and access fees, from the protection from competition it confers on the incumbent In-flight Catering firms at the Airport.

(iv) Absence of a Legitimate Business Justification

48. After deciding to exclude new-entrant firms from supplying Galley Handling at the Airport, VAA put forth a variety of factors that, it claims, justify its anti-competitive conduct. None of VAA's explanations constitute a legitimate business justification; they are not credible efficiency or pro-competitive rationales for VAA's Practice that are independent of the anti-competitive effects of its conduct, and in any event, they do not outweigh VAA's subjective intent to exclude or the reasonably foreseeable or expected exclusionary effects of the Practice.

49. Moreover, VAA's conduct with respect to airside access for the supply of In-flight Catering is opposite to its policy concerning airside access for the supply of ground handling (such as baggage handling) at the Airport. VAA places no restriction on the number of firms it permits to access the airside to supply ground handling to airlines at the Airport.
50. Firms seeking authorization from VAA to access the airside to supply In-flight Catering at the Airport are well-established businesses that provide In-flight Catering at other airports in Canada, where they have been permitted to operate by the relevant airport authority.
51. The overall character or purpose of VAA's Practice is anti-competitive.

C. VAA'S CONDUCT HAS HAD, IS HAVING AND IS LIKELY TO HAVE THE EFFECT OF PREVENTING AND/OR LESSENING COMPETITION SUBSTANTIALLY IN THE MARKET FOR GALLEY HANDLING AT THE AIRPORT

52. VAA's ongoing refusal to grant access to the Airport airside to new-entrant firms for the supply of Galley Handling at the Airport, and its continued tying of access to the Airport airside for the supply of Galley Handling to the leasing of Airport land from VAA for the operation of Catering kitchen facilities, has had, is having and is likely to have the effect of preventing or lessening competition substantially in the market for the supply of Galley Handling at the Airport. But for this ongoing practice of anti-competitive acts, the market for the supply of Galley Handling at the Airport would be substantially more competitive.
53. In the absence of VAA's Practice, significant new entry into the market for the supply of Galley Handling at the Airport would likely occur. New entrants have already sought authorization to access the airside to provide In-flight Catering at the Airport, and would be likely to begin operations at the Airport in the absence of VAA's Practice.

54. VAA's conduct insulates the incumbent In-flight Catering firms at the Airport from these new sources of competition, enabling those firms to exercise a materially greater degree of market power, through materially higher prices and materially lower levels of service quality, than would otherwise prevail in the absence of VAA's practice.
55. Enhanced rivalry from new entry would result in a substantially more competitive market for the supply of Galley Handling at the Airport. The ability of airlines seeking Galley Handling or In-flight Catering at the Airport to contract with alternatives to the incumbent providers would result in materially lower prices for the supply of Galley Handling at the Airport and materially greater service and product quality. Airlines have already realized these benefits at airports in Canada where new entry has been permitted to occur.
56. New entry would also bring to the Airport the introduction of innovative and/or more efficient Galley Handling business models. For example, airlines would gain the ability to choose to procure Galley Handling at the Airport from other than a full-service In-flight Catering firm, or from an In-flight Catering firm with a lower-cost off-Airport location, delivering efficiencies to service providers and savings to airlines.
57. In sum, but for VAA's practice of anti-competitive acts, the market for the supply of Galley Handling at the Airport would be substantially more competitive, including by way of materially lower prices, materially enhanced innovation and/or materially more efficient business models, and materially higher service quality.

IV. A TRIBUNAL ORDER IS NECESSARY

58. An order of the Tribunal is necessary and appropriate in the circumstances, including for the following reasons:

- a. VAA's ongoing refusal to grant access to the Airport airside to new-entrant firms for the supply of Galley Handling at the Airport, and its continued tying of access to the Airport airside for the supply of Galley Handling to the leasing of Airport land from VAA for the operation of Catering kitchen facilities, has had, is having and is likely to have the effect of preventing or lessening competition substantially in the market for the supply of Galley Handling at the Airport;
- b. an order, and more particularly, the relief sought by the Commissioner herein, is reasonable and necessary to overcome the anti-competitive effects of VAA's practice in the market for the supply of Galley Handling at the Airport and to restore or stimulate competition in the market;
- c. an order ensures an enforceable mechanism is in place to prevent VAA from engaging in the same or similar conduct likely to have the effect of preventing or lessening competition substantially in the market for the supply of Galley Handling at the Airport; and
- d. an order will indicate to the Canadian marketplace more broadly that the practices described by the Commissioner herein are anti-competitive.

V. RELIEF SOUGHT

59. The Commissioner therefore seeks an order of the Tribunal:

- a. pursuant to subsections 79(1) and 79(2) of the Act:
 - i. prohibiting VAA from directly or indirectly engaging in the practice of anti-competitive acts set out in this Application, namely: (i) VAA's ongoing refusal to grant access to the

Airport airside to new-entrant firms for the supply of Galley Handling at the Airport; and (ii) VAA's continued tying of access to the Airport airside for the supply of Galley Handling to the leasing of Airport land from VAA for the operation of Catering kitchen facilities;

- ii. requiring VAA to issue authorization, on non-discriminatory terms, to any firm that meets customary health, safety, security and performance requirements, so as to entitle that firm to access the airside at the Airport, from one or more facilities used by the firm whether located on Airport property or off Airport property, for the purposes of supplying Galley Handling; and
 - iii. otherwise requiring VAA to take any action, or to refrain from taking any action, as may be required to give effect to the foregoing prohibitions and requirements;
- b. directing VAA to pay costs;
 - c. directing VAA to establish, and thereafter maintain, a corporate compliance program consistent with the Commissioner's bulletin entitled "Corporate Compliance Programs", as such bulletin may be revised from time-to-time; and
 - d. containing such further and other relief as the Commissioner may request and this Tribunal may consider appropriate.

DATED AT Gatineau, Quebec, this 29th day of September, 2016



John Pecman
Commissioner of Competition

SCHEDULE “A”

CONCISE STATEMENT OF ECONOMIC THEORY

1. Despite requests from both airlines and In-flight Catering firms, VAA refuses to grant authorization to new-entrant firms to access the Airport airside to supply Galley Handling at the Airport. VAA also ties access to the Airport airside for the supply of Galley Handling to the leasing of Airport land from VAA for the operation of Catering kitchen facilities, by requiring firms providing In-flight Catering at the Airport to lease land from VAA for the operation of Catering kitchen facilities as a condition of authorizing access to the airside.
2. VAA's conduct is anti-competitive, having the purpose and effect of an intended negative effect on competitors that is exclusionary. VAA's exclusionary conduct has negatively impacted, and is likely to negatively impact, the businesses of firms that provide Galley Handling or In-flight Catering, leading to, among other things, lost contracts with airlines, reduced revenues, higher costs and delayed entry and expansion in Canada.
3. VAA's anti-competitive conduct has had, is having and is likely to have the effect of preventing or lessening competition substantially in the market for the supply of Galley Handling at the Airport.

MARKET POWER

4. The relevant product markets are: (i) access to the airside for the supply of Galley Handling; and (ii) Galley Handling. The Airport is the relevant geographic market for both product markets.

5. VAA substantially or completely controls the market for access to the Airport airside for the supply of Galley Handling, as well as the market for the supply of Galley Handling at the Airport.
6. VAA has a substantial degree of market power in the market for access to the Airport airside for the supply of Galley Handling. In fact, VAA is a monopolist in this market, being the only entity from which a Galley Handling or In-flight Catering firm may obtain access to the Airport airside. As a monopolist, VAA is generally able to dictate the terms upon which it sells or supplies access to the Airport airside for the supply of Galley Handling. Barriers to entry and expansion in the market for access to the Airport airside for the supply of Galley Handling are absolute. Entry of an alternative source of supply of access to the Airport airside simply is not possible. VAA's substantial degree of market power in the market for access to the Airport airside for the supply of Galley Handling is not constrained by Galley Handling or In-flight Catering firms or otherwise.
7. By virtue of its control over access to the Airport airside – a necessary input to the supply of Galley Handling – VAA also has a substantial degree of market power in the market for the supply of Galley Handling at the Airport. VAA has considerable latitude to determine or influence price and non-price dimensions of competition in the market for the supply of Galley Handling at the Airport, including the terms upon which Galley Handling and In-flight Catering firms carry on business in this market.

ANTI-COMPETITIVE CONDUCT

8. VAA has engaged in and is engaging in a practice of anti-competitive acts through: (i) its ongoing refusal to grant access to the Airport airside to new-entrant firms for the supply of Galley Handling at the Airport; and (ii) its continued tying of access to the Airport airside for the supply of Galley

Handling to the leasing of Airport land from VAA for the operation of Catering kitchen facilities. The purpose and effect of VAA's conduct is an intended negative effect on competitors that is exclusionary.

9. VAA has a competitive interest in the market for the supply of Galley Handling at the Airport, and in insulating the incumbent In-flight Catering firms at the Airport from new sources of competition. VAA shares in the revenue generated from the supply of Galley Handling and In-flight Catering at or from the Airport, and benefits, through lease and access fees, from the protection from competition it confers on the incumbent In-flight Catering firms at the Airport.

Substantial Lessening and/or Prevention of Competition

10. VAA's ongoing refusal to grant access to the Airport airside to new-entrant firms for the supply of Galley Handling at the Airport, and its continued tying of access to the Airport airside for the supply of Galley Handling to the leasing of Airport land from VAA for the operation of Catering kitchen facilities, has had, is having and is likely to have the effect of preventing or lessening competition substantially in the market for the supply of Galley Handling at the Airport.
11. In the absence of VAA's anti-competitive conduct, the market for the supply of Galley Handling at the Airport would be substantially more competitive. Significant new entry would likely occur, enhancing rivalry with incumbent suppliers of In-flight Catering and resulting in materially lower prices for the supply of Galley Handling at the Airport, materially enhanced innovation and/or materially more efficient business models, and materially higher service quality.

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CT-2016-015

THE COMPETITION TRIBUNAL

IN THE MATTER OF the *Competition Act*, R.S.C. 1985, c. C-34, as amended;

AND IN THE MATTER OF certain conduct of Vancouver Airport Authority relating to the supply of in-flight catering at Vancouver International Airport;

AND IN THE MATTER OF an application by the Commissioner of Competition for one or more orders pursuant to section 79 of the *Competition Act*.

BETWEEN:

COMMISSIONER OF COMPETITION

Applicant

—and—

VANCOUVER AIRPORT AUTHORITY

Respondent

RESPONSE OF VANCOUVER AIRPORT AUTHORITY

PART I - OVERVIEW

1. Pursuant to its statutorily-derived mandate, the Vancouver Airport Authority (referred to hereinafter as the “**Authority**”) is charged with operating the Vancouver International Airport (the “**Airport**” or “**YVR**”) – Canada’s second largest airport – in a safe and efficient manner, to generate economic development for Vancouver, and more broadly, for British Columbia and the rest of Canada, in furtherance of the public interest. The fulfilment of that mandate involves countless operational decisions, requiring the application of the Authority’s experience and expertise in exercising its business judgment relating

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to such matters as how best to assist in the movement of people and goods between Canada and the rest of the world.

2. In order for the Authority to achieve its goals, it must be able to compete with other similarly-situated airports (such as San Francisco and Seattle) in attracting the business of major international airlines to the Airport. Despite its relatively small size (as compared to some of its competitors), the Authority has succeeded in attracting major international airlines to YVR as a gateway to the Pacific Rim. The Authority has done so, in large part, by taking an active approach to managing the Airport with an eye to maximizing efficiency and value for all airlines and other stakeholders. The Airport's ability to compete depends upon a number of factors, including the services that are available at YVR. Among the services demanded by many airlines on numerous routes is the supply of catering and related services. Such services and, in particular, the provision of high quality, fresh catered meals are an important requirement for first-class and business class passengers, who, in turn, are key to airline profitability and the viability of existing and future airline routes to and from YVR. Given YVR's geographic location and unique ground access issues, in order to ensure delivery of such high quality, fresh meals on a timely and flexible basis, it is necessary that catering firms be located at the Airport.
3. Accordingly, it is particularly important for the Airport to ensure that the full range of catering and related services, including high quality, fresh catered meals, are available to airlines operating out of YVR. At the same time, the provision of catering services involves substantial capital investment, such that a departing catering firm cannot be easily (or quickly) replaced. In addition, to the best of the Authority's knowledge, the demand for catering and related services at the Airport is not sufficient to support additional entry at this time. As a result, the Authority believes that the entry of additional catering firms would imperil the continued viability of the operations of the two existing catering firms at the Airport. The Authority is particularly concerned about the significant disruptions of service that would follow the exit of either of the catering firms from the Airport.

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4. It was for these reasons, in order to ensure that the Airport continues to be served by two competitive, on-site catering firms, that the Authority decided that it would not be in the public interest to permit an additional firm to operate at the Airport at this time. This decision was based on the Authority's experience and expertise having regard to the consideration of all relevant factors in operating one of the Canada's largest airports and in ensuring that the Airport, which is uniquely situated as Canada's primary gateway to the Pacific Rim, can compete with larger airports on the US west coast. Thus, far from committing any anti-competitive acts, the Airport has at all times acted in a manner designed to foster competition and ensure the overall efficiency of the Airport's operations.
5. Notwithstanding the Authority's expertise and experience in navigating the complex set of considerations at play in the operation of an airport such as YVR, the Commissioner of Competition (the "**Commissioner**") has brought the within proceeding and seeks an order substituting the Commissioner's judgment for that of the Authority as to what would best serve the public interest. Indeed, the very content of the order being sought by the Commissioner, which would require the Authority "to issue authorization, on non-discriminatory terms, to any firm that meets customary health, safety, security and performance requirements, so as to entitle that firm to access the airside at [YVR]" incorrectly assumes away the myriad factors the Authority must take into consideration when exercising its public interest mandate to provide access to the Airport, particularly airside.
6. As is discussed more fully below, the proceeding suffers from a number of fundamental flaws and should be dismissed by the Tribunal.
7. First, the proceeding wholly fails to take into account the fact that, at all times, the Authority as the regulator of access at the Airport has been acting in accordance with its statutory mandate to operate the Airport in furtherance of the public interest. Accordingly, section 79 of the *Competition Act* (the "**Act**") as a matter of fact and law does not apply to the actions of the Authority that are at issue, having regard to the application of the regulated conduct exemption.

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8. Second, the Authority does not substantially or completely control the alleged market for access to the Airport airside for the purpose of providing “Galley Handling” (defined below), contrary to the allegations made in the Commissioner’s Notice of Application and Statement of Material Grounds and Facts (“**SMGF**”) (together, the “**Application**”).
9. Third, with respect to the market for Galley Handling (which is inaccurately defined by the Application and which is accurately defined below), the Authority does not itself provide Galley Handling or have a commercial interest in any entity providing Galley Handling at YVR. The Authority does not have market power in, and does not control – let alone substantially or completely control – that market.
10. Fourth, the Authority doesn’t represent entities involved in the provision of Galley Handling at YVR, nor does it have any plausible competitive interest in the market for Galley Handling, in respect of which it is alleged to have committed anti-competitive acts. This case is clearly distinguishable from, and represents an unwarranted attempt by the Commissioner to extend the reach of section 79 well beyond what was articulated in, the *Toronto Real Estate Board* case (“**TREB**”).
11. Fifth, as noted above, far from having an anti-competitive purpose, the Authority was at all times motivated by a desire to preserve and foster competition, and had a valid business justification that was both pro-competitive and efficiency-enhancing.
12. Sixth, the conduct of the Authority will not, and is not likely to, lessen or prevent competition substantially. On the contrary, the Authority’s conduct has ensured continuing vigorous competition between the two existing in-flight caterers. Moreover, the ability of airlines to self-supply, including by “ferrying” food and snacks from other airports, effectively limits the ability of the existing catering firms from imposing a significant, non-transitory increase in prices.

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13. The Authority therefore respectfully requests that the Tribunal dismiss the Application, with costs.

PART II – ADMISSIONS AND DENIALS

14. Except as expressly admitted below, the Authority denies all allegations contained in the SMGF.
15. The Authority admits paragraphs 7, 8 and the first two sentences of paragraph 17, the first sentence of paragraph 38, and the first two sentences of paragraph 46 of the SMFG.

PART III – MATERIAL FACTS UPON WHICH THE AUTHORITY RELIES

(a) The Authority and its Public Interest Mandate

16. The Airport is located on Sea Island, approximately 12 kilometres from downtown Vancouver. It is the second busiest airport in Canada by aircraft movements and passengers. It is also an important driver of economic growth for Vancouver and, more broadly, for British Columbia and the rest of Canada, as it serves to connect Vancouver to other cities around the world and, in particular, serves as a gateway between Asia and the Americas.
17. The federal government decided in the early 1990s to cede operational control of major airports in Canada to not-for-profit, community-based organizations. To that end, the Authority was created pursuant to Part II of the *Canada Corporations Act*, R.S.C. 1970, c. C-32 (and, in 2013, continued under the *Canada Not-for-profit Corporations Act*, S.C. 2009, c. 23.) The Authority's Articles of Continuance set out a "Statement of Purposes of the Corporation", which include:
 - a) to acquire all of, or an interest in, the property comprising the Vancouver International Airport to undertake the management and operation of the Vancouver International Airport in a safe and efficient manner for the general benefit of the public;

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- b) to undertake the development of the lands of the Vancouver International Airport for uses compatible with air transportation; and
 - c) to generate, suggest and participate in economic development projects and undertakings which are intended to expand British Columbia's transportation facilities, or contribute to British Columbia's economy, or assist in the movement of people and goods between Canada and the rest of the world.
18. Most of the members of the Authority's Board of Directors are nominated by various levels of government and local professional organizations, including the Government of Canada, the City of Vancouver, the City of Richmond, Metro Vancouver, the Vancouver Board of Trade, the Law Society of British Columbia, the Institute of Chartered Accountants of British Columbia, and the Association of Professional Engineers and Geoscientists of British Columbia. In addition, there are currently five members who serve as "at large" directors (one of whom is the Authority's Chief Executive Officer; the others are local business people).
19. By Order-in-Council No. P.C. 1992-18/501,¹ the Minister of Transport was authorized to enter into an agreement to transfer operational control of the Airport to the Authority. To that end, the Minister of Transport entered into a ground lease dated June 30, 1992 with Authority. Among other things, the lease provides that the Authority shall "manage, operate, and maintain the Airport ...in an up-to-date and reputable manner befitting a First Class Facility and a Major International Airport, in a condition and at a level of service to meet the capacity demands for airport services from users within seventy-five kilometres."
20. Since that time, the operation of the Airport has been carried out by the Authority, which is a not-for-profit corporation and which re-invests all revenues net of expenses back into the Airport. Any excess of revenue over expenses that may

¹ The Order-in-Council was made pursuant to the authority under the *Airport Transfers (Miscellaneous Matters) Act* (S.C. 1992, c. 5) which permits the Minister of Transport to designate a body to which the Minister is to "sell, lease or otherwise transfer an airport."

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accrue in any given year are re-invested in capital projects for the Airport, pursuant to the Authority's public interest mandate.

21. The not-for-profit nature of the Authority reinforces its mandate to manage the Airport in the public interest, all as reflected in its "mission", "vision" and "values" which are as follows: mission: connecting British Columbia proudly to the world; vision: a world-class sustainable gateway between Asia and the Americas; and values: safety, teamwork, accountability and innovation.
22. The Authority grants licences and permits to businesses that wish to operate at the Airport and that comply with applicable regulations (relating to health & safety, security and otherwise), including airlines and related airline service businesses (such as ground handling, de-icing, fueling, maintenance and in-flight catering services). In deciding whether to grant any given licence or permit, the Authority carefully considers whether the addition of the particular business to the Airport would be consistent with, and further, the Authority's mandate to operate the Airport in the best interests of the public. Accordingly, the Authority cannot agree to any and all requests for access.

(b) Catering and Galley Handling at YVR

23. The Authority does not provide catering services or Galley Handling (defined below), or any other related service at YVR or elsewhere, nor does it have a commercial interest in, or represent, entities involved in providing any such service.
24. Virtually all commercial airlines operating out of YVR offer some type of food and drink service on virtually every flight. The level of food and drink service varies by airline, by route and by seat class, with the offerings ranging from drinks and peanuts or pretzels, at one extreme, to freshly prepared meals, including hot entrées, at the other extreme. For the vast majority of flights operated out of YVR, freshly cooked meals are offered in only two situations: on overseas flights; and to business/first class passengers (who are particularly important to airlines' profitability).

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25. The Airport's ability to ensure the availability of a competitive choice of freshly prepared meals is very important to its efforts to attract new airlines and routes and retain existing flights and routes at the Airport. Asia-based airlines, in particular, place a premium on the availability of a competitive choice of freshly prepared meals.
26. There are currently two companies offering freshly prepared meals for airlines at the Airport, Gate Gourmet Canada Inc. ("**Gate Gourmet**") and CLS Catering Services Ltd. ("**CLS**"). Each company operates a full kitchen, in respect of which each has made significant investments on-site at the Airport.
27. In addition to the fresh meals, Gate Gourmet and CLS each provide a full range of other perishable food (such as fresh snacks and other buy-on-board offerings). They also provide a full range of non-perishable food items (chips and peanuts and the like) and drinks.
28. And, each of Gate Gourmet and CLS offers an additional service: the loading and unloading of all food and drink products onto aircraft, as well as ancillary services, such as the assembly of meal trays and aircraft trolley carts and the transportation of food and drink products between the warehouse or kitchen facility and aircraft.
29. In this Response, the preparation and loading onto aircraft of fresh meals and other perishable food offerings is referred to as "**Catering**", while the provision and loading onto aircraft of non-perishable food items and drinks, as well as other items such as duty free products are referred to collectively as "**Galley Handling**". The Authority specifically denies the market definitions set out at paragraph 12 of the SMFG.
30. Gate Gourmet and CLS compete with each other to meet the Catering and Galley Handling needs of airlines operating at YVR.
31. As acknowledged by the Commissioner, airlines also have the option of meeting all or a portion of their Catering and Galley Handling needs through self-supply or

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“double catering”. (“Double catering”, also sometimes called “ferrying”, refers to the practise of transporting extra meals and supplies from one airport for service during a flight departing a second airport.)

32. The Authority specifically denies the Commissioner’s allegation, in the third sentence of paragraph 13 of the SMFG, that such self-supply or double catering is not a “feasible or preferable” substitute for in-flight catering for most airlines in Canada.
33. With respect to self-supply, all airlines are free to self-supply at YVR without being granted specific access for this purpose by the Authority. This includes the option for airlines to source meals and provisions from wherever they choose and to load all meals and provisions onto their aircraft at YVR themselves. WestJet, Canada’s second largest airline, with the second most flights serving YVR, self-supplies from its own facility at the Airport.
34. In addition, Alaska Airlines and Horizon both use double catering to fulfill their in-flight catering needs at YVR. And Air Canada, Canada’s largest airline with the most flights serving YVR, double caters, bringing into YVR frozen main course economy class meals prepared by a flight kitchen located at the Montréal airport. To the Authority’s knowledge, self-supply and double catering are widespread not only at YVR, but also at other airports throughout Canada.
35. Gate Gourmet and CLS (and their respective predecessors) have operated at YVR since approximately 1970 and 1983 respectively, under long term leases first entered into by the Minister of Transport and later assumed by the Authority.
36. The Authority charges competitive rents to Gate Gourmet and CLS, based in large part on the market value of the land occupied by their respective operations, as determined through an arbitration mechanism under each lease. The land rents charged to Gate Gourmet and CLS reflect the opportunity cost of the land being used at the Airport, which is in high demand given the prime location. The Authority would have no difficulty in finding other tenants at similar market rates for the space used by these two firms at the Airport.

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37. In addition, like all suppliers at YVR with access to the airside, Gate Gourmet and CLS also entered into licence agreements with the Authority, setting out the terms and conditions under which they operate and obtain access to the airside. Under the licence agreements, Gate Gourmet and CLS pay to the Authority a percentage of their respective revenues from the sale of Catering and Galley Handling Services, as well as a percentage of the revenues earned from off-Airport catering services.
38. Gate Gourmet (including its predecessors) first occupied land at YVR in or about 1970. It operates pursuant to both a licence agreement and lease. The licence agreement, dated June 1, 1996, provides for a fee on revenues at a rate no higher than 3.5% until January 1, 2002. From January 1, 2002 to December 31, 2010, the Authority was able to increase the percentage rate under the licence agreement, provided it raised it for all operators. A supplemental agreement was entered into effective June 1, 1996 whereby off-airport sales were made subject to a lower percentage rate (i.e. 1.143% on the first \$4 million of revenues, 1.643% on revenues between \$4 million and \$6 million and 2.143% on revenues above \$6 million). The Authority increased the percentage rate for sales at the Airport on January 1, 2010, to 4.5%, and on January 1, 2011, to 5%.
39. CLS (including its predecessors) first occupied land at YVR in or about 1983. It operates pursuant to both a license agreement and lease. Its licence agreement, dated September 15, 1998, and its supplemental agreement effective September 15, 1998, provide for the same fee percentages and structure as described above in respect of Gate Gourmet's licence agreement. For CLS, as for Gate Gourmet, the Authority increased the percentage rate for sales at the Airport on January 1, 2010, to 4.5%, and on January 1, 2011, to 5%.
40. Gate Gourmet currently operates under a lease dated April 1, 2002. At that time, Gate Gourmet's predecessor leased, in addition to the land previously occupied by it, an additional 8.78 acres of adjacent land (the "Expansion Lands") for the purpose of building new and expanded facilities. Effective November 1, 2007, the Authority agreed to take back 4.54 acres of the Expansion Lands. Effective

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October 1, 2012, the Authority agreed to take back a further 2.03 acres from Gate Gourmet. On July 1, 2013, Gate Gourmet agreed to take 0.22 acres of this land back from the Authority, by way of an easement to install a security fence.

41. Gate Gourmet's current rent of \$937,190.25 per annum became effective April 1, 2012, and is applicable to the five year rent review period from April 1, 2012 to March 31, 2017.
42. CLS currently occupies a smaller piece of land than Gate Gourmet where it operates under a lease dated July 1, 2008. The current rent of \$271,066.78 became effective July 1, 2013 and is applicable to the lease's five year rent review period from July 1, 2013 to June 30, 2018.
43. These lease agreements and licence agreements generate revenues that are, relatively speaking, *de minimis* as a fraction of the Authority's total revenues, amounting to approximately 1% of the Authority's total revenues.
44. It is efficient for each of Gate Gourmet and CLS to provide both Catering Services and Galley Handling, using its same facilities, equipment and personnel.
45. It is also efficient for Gate Gourmet and CLS and, more particularly, for their respective kitchens to be located on-site at YVR. Sea Island, on which the Airport is located, is only accessible from the City of Vancouver by one bridge, and from the City of Richmond by three bridges. These bridges often act as bottlenecks, significantly slowing access to the Airport, particularly during rush hour traffic. In addition, vehicles that access the Airport airside must first pass through a security check-point and individuals in the vehicle are also subject to security checks. Given the unique ground access issues at YVR arising from it being located on an island and the importance of fresh food being provided to aircraft on a timely basis, and given that flight manifests are subject to last-minute changes, it is not desirable for Catering services to be located off-airport at YVR. On-airport Catering facilities provide the best assurance of an ability to meet such last-minute demands, thereby limiting the possibility either of

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dissatisfied passengers (and, accordingly, dissatisfied airlines) or delayed flights. In that regard, it should be noted that the costs of flight delays are borne not only by the airline in question and its passengers, but also by other airlines and their respective passengers, as the delay of one flight at one gate can create a “domino effect” resulting in further delays at the Airport.

46. In addition, given the substantial investment required to set up a commercial kitchen, companies that provide Catering services from on-airport facilities are more committed to staying at the Airport even if business conditions deteriorate in the short term, which provides the Authority with greater assurance of the continuity of supply of such services and the avoidance of service disruptions.

(c) Declining Demand for In-flight Catering Services at YVR

47. In 1992, when the Authority took over responsibility for operating the Airport, there were three companies offering Catering and Galley Handling services at the Airport: Gate Gourmet, CLS and a third company, LSG Sky Chefs. However, LSG Sky Chefs exited the Airport following the acquisition of Canadian Airlines by Air Canada in 2003, due (to the best of the Authority’s knowledge) to a lack of demand.
48. The first decade of this century saw the commercial aviation industry experience a number of significant challenges, including 9-11 in 2001, the outbreak of SARs in 2003-2004 and the recession of 2007-2009. During this period, the market for Catering services changed dramatically in North America, with carriers eliminating meal service to the economy cabin and replacing it with “buy on board” offerings. Service of fresh meals became restricted to overseas flights and to the premium cabins.
49. As a result of this shrinking demand for Catering services, the revenues of the Catering operations at YVR declined. That drop in revenues persisted even when the number of passengers using the Airport experienced significant growth towards the end of the decade.

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50. Over that ten-year period, although the Authority had the right under the terms of its licences with Gate Gourmet and CLS to raise the concession fees, it chose not to do so. Rather, over the period from the mid-to-late 1990s up until 2010, the concession fee rates were kept below comparable rates at other airports. When the Authority finally did increase the rates in 2010-2011, it raised them only to the bottom of the prevailing range charged at other Canadian airports, i.e., to 4.5% and then 5% of revenues earned from Catering and Galley Handling. Moreover, for revenues generated from off-Airport catering, it agreed to continue to hold the concession fees to below market rates. As described above, the Authority from time to time also allowed Gate Gourmet to surrender significant portions of the land it leased at YVR from the Authority, and to reduce its rent accordingly. The Authority took these measures in order to ensure the continued viability of the two companies' operations at the Airport and thereby to ensure continued competition for Catering services at YVR.
51. The Authority therefore specifically denies the Commissioner's inaccurate allegation, at paragraph 32 of the SMFG, that in 2010-2011, the Authority was able to impose and sustain a more than 40% increase in the fee it charges.

(d) Requests by Potential New Entrants

52. In or about December 2013, the Authority was contacted by a representative of Newrest Canada ("**Newrest**"), seeking a licence to access the airside at the Airport for the purpose of providing both Galley Handling and Catering services. With respect to the Catering services that it wished to provide at the Airport, Newrest was proposing to do so from a kitchen located off-Airport.
53. In or about April 2014, the Authority was contacted by a representative of Strategic Aviation Services Ltd. ("**Strategic**"), seeking a licence to access the airside at the Airport for the purpose of providing Galley Handling services.
54. Upon being contacted by Newrest and Strategic, the Authority applied its experience and expertise to carefully review the markets for Catering and Galley Handling at YVR, with a view to determining whether there was sufficient

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demand to permit new entry without jeopardizing the existing operational excellence and competition for the full range of services, including the provision of meals freshly-prepared on-site at the Airport.

55. Ultimately, the Authority concluded and advised Newrest and Strategic that the licences requested would not be granted at that time. As Newrest and Strategic were advised, the reasons included: the presence of two competitive flight kitchen operations at YVR; the fact that a third – LSG SkyChef – had left the Airport in 2003 for reasons that the Authority understood were due to the size of the market at YVR; and the setbacks that the airline industry had undergone since that time, including the declining market for Catering services. The Authority advised Newrest and Strategic that it believed that the local market demand was simply not able to support the addition of a new entrant.
56. At all times, representatives of the Authority explained that, while the Authority was of the view that additional entry was not warranted at that time, the Authority would review the situation from time-to-time. It was further explained that if, upon such review, a different conclusion was reached, the Authority would likely issue a Request for Proposal (“RFP”) for the selection of an additional provider or providers of Galley Handling and Catering services at YVR.
57. In 2015, the Authority received one further request for a licence for airside access from each of Newrest and Strategic. The Authority has not received any other requests for licences to provide either Galley Handling or Catering services at the Airport.
58. The Authority has continued to assess the advisability of issuing a RFP for additional Catering and/or Galley Handling-service providers at YVR.
59. In 2015, the Authority removed the restriction on the number of ground handling operators at YVR, in favour of a policy to license all those providers who could meet the Authority’s requirements. The Authority’s decision to open ground handling in this manner was based on its experience and its expertise, involving consideration of a wide range of considerations specific to the market for ground

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handling, including, among other factors, the merger of two non-airline providers of ground handling services, the ability of ground handlers to enter or exit the market because they can easily move their equipment and operations among airports, and the Authority's desire to incentivize environmentally-friendly performance in the provision of these services.

60. In or about February, 2016, Strategic was among the companies granted a licence to provide ground handling at YVR.

PART IV – STATEMENT OF THE GROUNDS ON WHICH THE APPLICATION IS OPPOSED

(a) Section 79 of the Act Does Not Apply to the Authority's Decision Not to Permit Additional Firms to Offer Galley Handling Services at the Airport

61. Section 79 of the Act does not apply to a regulator acting pursuant to a validly enacted legislative or regulatory mandate. Accordingly, section 79 does not apply as a matter of fact and law to the Authority when exercising its public interest mandate pursuant to legislative enactment, including the applicable Order in Council.

(b) In the Alternative, the Requirements of Section 79 Are Not Made Out

62. In the alternative, if section 79 of the Act does apply to the Authority's decision not to permit additional firms to offer Galley Handling services at the Airport, then the requirements under paragraphs 79(1)(a), (b) and (c) of the Act have not been met.

(i) *The Authority does not Substantially or Completely Control Either the Market for Airport Airside Access for the Supply of Galley Handling or the Market for Galley Handling*

63. The Authority denies that it substantially or completely controls either the market for access to the YVR airside for the supply of Galley Handling, or the market for the supply of Galley Handling.

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64. The Authority denies that it substantially or completely controls the market for access to the Airport airside for the supply of Galley Handling. The Authority is not generally able to dictate the terms upon which it sells or supplies access to the Airport airside for the supply of Galley Handling, among other reasons, because airlines are free to meet their Galley Handling needs through self-supply or double catering and, accordingly, do not need to obtain access to the Airport airside for that purpose.
65. As well, the Authority, which competes with other airports to attract airlines, including through offering an efficient mix of services to those airlines, is constrained in its ability to dictate the terms upon which it sells or supplies access to the Airport airside for the supply of Galley Handling. The fact that the Authority chose not to raise the rates of the concession fees it charges to Gate Gourmet and CLS for more than a 10-year period demonstrates that it was, and continues to be, constrained in its ability to dictate terms upon which it sells or supplies access to the airside for the supply of Galley Handling.
66. The Authority further denies that it substantially or completely controls the market for Galley Handling. Because airlines can meet their Galley Handling needs through self-supply or double catering, the relevant geographic market for Galley Handling is broader than the Airport.
67. The Authority does not provide Galley Handling and does not own any interest in, or represent, any provider of Galley Handling.
68. The Authority does not have any market power in the market for Galley Handling. Contrary to the Commissioner's allegation, the Authority does not have "considerable latitude" to determine or influence price and non-price dimensions of competition in the market for Galley Handling. In the alternative, if the Authority did have such latitude (which is denied), that would not amount to market power in the relevant product market.
69. In the further alternative, if a provider of an input into a downstream market can be viewed as having market power in that downstream market, then the Authority

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does not have market power in that market, for the same reasons cited above at paragraphs 64 and 65 – it does not completely or substantially control the market for access airside at the Airport for providing Galley Handling.

(ii) The Authority Has Not Engaged in a Practice of Anti-Competitive Acts

70. The Authority has not engaged in a practice of anti-competitive acts, within the meaning of paragraph 79(1)(b) of the Act.
71. The Authority has at all times acted, and continues to act, for the purpose of fulfilling its public interest mandate in operating the Airport and for no anti-competitive or other improper purpose.

The Authority's Purpose

72. The Authority did not at any time have any anti-competitive purpose. On the contrary, it had (and continues to have) a valid, efficiency-enhancing, pro-competitive business justification for not permitting new entry at this time.
73. In the exercise of its business judgement, informed by its expertise and experience, the Authority was (and remains) concerned that there is insufficient demand to justify the entry of additional firms providing Galley Handling services at the Airport.
74. The Authority carefully considered the complex set of factors affecting its decision in the unique context of YVR's competition with other airports – including major U.S. airports such as San Francisco and Seattle – to attract flights and grow as a gateway to the Pacific Rim and other destinations of major international long-haul carriers.
75. In view of the importance of Catering services to these carriers, the Authority acted to ensure that the existing companies providing Catering and Galley Handling services are able to operate efficiently at the Airport by, among other things, each sharing its costs over both the Catering and the Galley Handling services it provides. Having experienced the exit of one firm providing Catering

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and Galley Handling services at the Airport, the Authority is concerned that, if one or more new firms were permitted to provide Galley Handling services at the Airport, one or both of the two existing firms – who provide both Catering and Galley Handling – would no longer be viable. Such an eventuality would eliminate the existing choice of, and competition between, at least two Catering providers at the Airport. Moreover, if one or both of these Catering firms were to exit the market, the Authority believes that it would be difficult to attract another on-Airport provider to provide Catering services at YVR, thereby affecting quality and service levels.

76. The decision made by the Authority was therefore directed at fulfillment of its public interest mandate, including ensuring to the greatest extent possible, the competitiveness of the Airport.
77. Thus, the Authority's purpose was at all times to ensure that it is able to retain and attract additional airline business to the Airport, by providing these airlines – in particular, long-haul carriers – with a competitive choice of at least two Catering companies at YVR.
78. Further, there is no factual or legal foundation for, and the Authority specifically denies, the Commissioner's allegations of "tying" set out at paragraphs 42 through 44 of the SMFG regarding the Authority's requirement for firms providing Catering services to be located on-site at YVR.
79. At all material times, the Authority had a valid business justification for requiring Catering firms to be located on-site at the Airport. The Authority reasonably believes that the presence of Catering firms on-site at the Airport is important to ensure optimal levels of quality and service, which, in turn, are important to ensuring the efficient operation of the Airport as a whole, including achieving its public interest mandate, mission and vision.
80. Any exclusionary negative effect on Newrest and/or Strategic, which is not admitted but denied, was never the goal of the Authority. Moreover, any such effect (which is denied) is outweighed by the Authority's legitimate business

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justification for refusing entry to an additional Galley Handling operation, at this time.

No Plausible Competitive Interest in Adversely Impacting Competition

81. As described above, unlike the respondent in prior cases decided by the Tribunal under section 79 of the Act, the Authority is not involved in the business in question, and does not have any similar commercial interest in the relevant markets as has been reflected in prior section 79 cases.
82. In any event, for the reasons discussed below, the Authority specifically denies that it has any plausible competitive interest in adversely impacting competition in the market for Galley Handling such as would be necessary to a finding that the Authority had committed anti-competitive acts within the meaning of paragraph 79(1)(b) of the Act.
83. The Authority specifically denies that a landlord and tenant relationship, such as that between the Authority on the one hand, and Gate Gourmet and CLS on the other hand, is of such a nature as to give rise to a plausible competitive interest in adversely impacting competition in the market in which the tenant competes.
84. In the alternative, as explained in further detail in the Authority's Concise Statement of Economic Theory set out in Schedule "A" to this Response, even if one assumes that the Authority was acting as a sole profit-maximizing monopolist with respect to control over airside access at the Airport, in order to maximize the revenues it earns from complementary service providers, such as from Galley Handling firms at the Airport, as alleged by the Commissioner, a monopoly supplier of access to the Airport airside for the purpose of supplying Galley Handling would have an interest in ensuring the most efficient market structure for the provision of Galley Handling at the Airport. Therefore, it follows that, even on the Commissioner's theory, the Authority would have no plausible interest in adversely affecting competition in Galley Handling.

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85. In any event, as outlined above, the Authority had a number of efficiency-enhancing and pro-competitive reasons for refusing further entry at this time.

(iii) No Substantial Lessening or Prevention of Competition

86. The Authority denies that its refusal to permit any additional companies to offer Galley Handling services at the Airport at this time has lessened or prevented, or is likely to lessen or prevent, competition for Galley Handling substantially.

87. First, because there is insufficient demand at the Airport to sustain additional entry at this time, if the Authority had permitted additional entrants to provide Galley Handling services at the airport, the likely result would have been less competition at the Airport for the provision of Catering services.

88. Second, the Authority's impugned acts in this case have not enabled, and are unlikely to enable, Gate Gourmet and CLS to exercise materially greater market power than they would have exercised in the absence of the acts.

89. There is vigorous competition between Gate Gourmet and CLS at the Airport as evidenced by significant shifts in the share of Galley Handling business and Catering business between them. Airlines can and do change Galley Handling and Catering firms at any given airport in response to price and service competition. The presence of only two Galley Handling and Catering firms at YVR is consistent with the number of such competitors located at other comparable North American airports.

90. In addition, the airlines, which are increasingly joining together in large international alliances, have considerable negotiating power with Galley Handling firms and exercise countervailing market power to play one Galley Handling provider off against the other in order to drive down prices and increase service levels.

91. The airlines' negotiating power is increased (and the Galley Handling firms' market power is correspondingly decreased) by the fact that they have the option

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of self-supplying or double catering all or a portion of their Galley Handling needs.

92. In any event, the Authority's judgment that providers of Catering and Galley Handling should be located on-site at the Airport cannot have had any "but for" effect on competition since the Authority determined that, in any event, no additional entry was warranted at this time.
93. Finally, the Authority's impugned acts have not had, and are unlikely to have, an impact on the existing providers' market power that extends through a material part of the market for Galley Handling, as to the best of the Authority's understanding, only Jazz and, possibly, Air Transat have sought to contract with a new entrant supplier of Galley Handling at the Airport.

PART V – STATEMENT OF ECONOMIC THEORY

94. The Authority's Concise Statement of Economic Theory is set out in Schedule "A" to this Response.

PART VI – RELIEF SOUGHT

95. The Authority requests an Order dismissing the Application with costs payable to the Authority. The Authority submits that the circumstances warrant the awarding of costs to the Authority on a full indemnity basis.

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PART VII – PROCEDURAL MATTERS

96. The Authority agrees that the Application be heard in English. The Authority proposes that the Application be heard in the City of Vancouver in addition to Ottawa. The Authority agrees with the Commissioner's proposal that documents be filed electronically.

All of which is respectfully submitted this 14th day of November, 2016.



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Schedule A - Concise Statement of Economic Theory

1. The Authority is a non-profit corporation operating in the public interest. Part of its mandate is to maximize traffic at the Airport by providing attractive services at the lowest possible fees to airlines and airline passengers. To accomplish that objective, it is in the interest of the Authority to ensure that its complementary service providers, including firms supplying Catering and Galley Handling, operate as efficiently as possible.
2. The Authority derives no benefit from restricting competition among firms providing Catering and Galley Handling, if the resulting market structure is inefficient. On the contrary, even if one assumes that the Authority was acting as a sole profit-maximizing monopolist with respect to control over airside access at the Airport as alleged by the Commissioner, such a monopoly supplier of access to the Airport airside for the purpose of supplying Galley Handling would have an interest in ensuring the most efficient market structure for the provision of Galley Handling at the Airport, as that would enable such a monopolist to maximize the revenues it earns from complementary service providers, including Catering and Galley Handling service providers.

Market Power

3. One of the key responsibilities of the Authority in executing its public interest mandate is to control access to the Airport airside. In addition to ensuring safety at the airport, this control allows the Authority to authorize an efficient number of providers across the full range of complementary service providers, including Catering and Galley Handling.
4. The Airport is the relevant geographic market for the provision of Catering to airlines using the Airport. The relevant geographic market for Galley Handling is broader than the Airport. Airlines can and do self-supply Galley Handling. Accordingly, Galley Handling services are not required at every airport. For example, Galley Handling may occur at any of the origin, destination or connecting airports. A number of airlines at the Airport meet their respective

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needs for Galley Handling for flights to and from Vancouver through services offered by third party suppliers at other airports or by providing those services themselves.

5. Airside access is an input to Catering at the Airport. Airside access is also an input to any Galley Handling that occurs at the Airport. However, airside access in Vancouver is not required to provide airlines with Galley Handling services since airlines can use multiple airports for Galley Handling services. The Authority charges fees for airside access to providers of Galley Handling and Catering, just as the Authority charges fees for airside access to other complementary service providers operating at the Airport.
6. The Authority does not supply any Galley Handling or Catering services. The Authority does not compete with any Galley Handling or Catering firms, and does not provide services that are a substitute for Galley Handling and Catering services. The Authority has no market power in any market for Galley Handling or Catering services.
7. Any influence that the Authority has on the prices charged by Galley Handling or Catering services to airlines is through the fees that the Authority charges for airside access. This is no different from the influence that a shopping mall owner has on the retail prices charged by its tenants to consumers for merchandise purchased at the shopping mall, when tenant rent is set as a percentage of retail revenues. The total revenues earned by the Authority from fees charged for airside access to Galley Handling and Catering services firms are a very small fraction of the Authority's total revenues.

The Authority's Conduct is Pro-Competitive

8. Catering and Galley Handling are complementary products to the services offered by the Authority. Therefore, it is in the Authority's interest that the markets for these complementary products be as competitive and efficient as possible, in order to maximize the value of the package of services offered by the Authority to airlines and passengers.

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9. Any inefficiency in the provision of Catering or Galley Handling at the Airport reduces the fees that the Authority can recover from those services while still maintaining attractive pricing to airlines.
10. It is well established in the economics literature that entry may not be “socially efficient” even if it is profitable for the entrant. With respect to services offered at the Airport, “social efficiency” means maximizing the value of services offered to airlines and passengers net of the total cost of providing those services. It is in the Authority’s interest to ensure that only socially efficient entry takes place in complementary markets, since socially efficient complementary markets will allow the Authority to maximize the value of its offering to airlines and passengers.
11. It is the Authority’s experience that having three Catering service providers at the Airport was not efficient, as one provider exited and the market for Catering services has been in decline. Further, it is the Authority’s experience that timely, high-quality Catering services can only be provided at YVR with on-site kitchen facilities.
12. If it were socially efficient to alter its conditions of airside access for a third supplier of Galley Handling and Catering at the Airport, it would be in Authority’s interest to do so because the Authority would benefit from the improved efficiency of its complementary service providers.
13. Requiring Catering suppliers to lease facilities at the Airport provides no additional exclusionary power to the Authority beyond that associated with limiting the number of Catering suppliers that have airside access. As a result, there is no possible exclusionary purpose for tying airside access to the condition of operating a catering kitchen on-site. Rather, the on-site requirement for Catering services at the Airport is necessary to guarantee timely service to airlines.
14. If Catering service could be provided at lower cost from an off-airport location while meeting the same service requirements such as timely and flexible

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delivery, it would be in the Authority's interest to allow suppliers to operate off-airport, since then the Authority could generate the same total revenues from Catering services while prices paid by airlines for Catering services would be reduced.

No Substantial Lessening of Competition

15. Incumbent Catering suppliers operating at the Airport rely on Galley Handling revenues to contribute to covering the shared fixed costs of providing Catering and Galley Handling services at the Airport. The Authority has determined that giving airside access to a firm offering only Galley Handling services would not be efficient because it would not allow current Catering and Galley Handling providers to cover costs, forcing one to exit, thereby eliminating competition for Catering services at the Airport. Similarly, given the Authority's past experience, it expects that entry by a third Catering service provider would cause the subsequent exit of one Catering supplier, thereby resulting in no increase in competition but with the Authority bearing some of the costs of such exit. Thus the decision not to authorize airside access for additional Catering and Galley Handling firms has not resulted in a substantial lessening of competition.
16. But-for the Authority's restrictions on airside access at the Airport, there would not be substantially more competition for Catering services at the Airport as there would remain either the same number of Catering firms or one fewer. But-for the Authority's requirements related to Galley Handling at the Airport, there would not be substantially more competition for Galley Handling services since airside access at the Airport is not required for airlines to have these services.

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CT-2016-015

THE COMPETITION TRIBUNAL

IN THE MATTER OF the *Competition Act*, R.S.C. 1985, c. C-34, as amended;

AND IN THE MATTER OF certain conduct of Vancouver Airport Authority relating to the supply of in-flight catering at Vancouver International Airport;

AND IN THE MATTER OF an application by the Commissioner of Competition for one or more orders pursuant to section 79 of the *Competition Act*.

BETWEEN:

COMMISSIONER OF COMPETITION

Applicant

– and –

VANCOUVER AIRPORT AUTHORITY

Respondent

REPLY OF THE COMMISSIONER OF COMPETITION

I. OVERVIEW

1. To justify its abuse of dominance – dominance that has substantially harmed competition for Galley Handling at Vancouver International Airport – VAA attempts to cloak itself as acting in the “public interest”. In seeking to do so, VAA ignores its obligation to comply with the *Competition Act*, a law of general application that has as its purpose to maintain and encourage competition in Canada, to the benefit of all Canadians.
2. VAA also makes the illogical argument it needs to *restrict* competition in the market for Galley Handling at the Airport to *preserve* competition. To try and support this argument, VAA makes allegations that have no evidentiary basis and also misapprehends the applicable legal test to evaluate VAA’s abusive conduct.
3. The fact is that VAA has abused its dominant market position by excluding and denying the benefits of competition to the Galley Handling market at the Airport. It has no legitimate explanation to justify the substantial prevention or lessening of competition that has resulted in higher prices, dampened innovation and lower service quality. In these circumstances, an order of the Tribunal to grant the relief sought by the Commissioner is necessary and appropriate.
4. The Commissioner repeats and relies upon the allegations in the Notice of Application, Statement of Grounds and Material Facts and Concise Statement of Economic Theory (the “**Application**”) and, except as hereinafter expressly admitted, denies each of the allegations in the Response of the Vancouver Airport Authority (the “**Response**”). Capitalized terms used herein are as defined in the Application.

II. THE *COMPETITION ACT* APPLIES TO VAA

5. Contrary to the allegations in the Response, section 79 of the Act applies to VAA's conduct. No "regulated conduct exemption" is available to VAA.
6. First, VAA is not a regulator. It is a corporation under the *Canada Not-for-profit Corporations Act* that has entered into a Ground Lease with the Minister of Transport to operate the Airport. The federal statute – *Airport Transfers (Miscellaneous Matters) Act* – that permits the Minister of Transport to enter into the Ground Lease does not confer a regulatory function on VAA.
7. Second, no provision in any Act of Parliament or any statutory instrument specifies that the *Competition Act* shall not apply, in whole or in part, to the activities of VAA. To the contrary, section 8.06.01 of the Ground Lease specifically requires VAA to observe and comply with any applicable law. VAA is a "person" within the meaning of section 79 of the Act, such that the Act's abuse of dominance provisions apply to VAA.
8. Third, there is no operational conflict or inconsistency between the application of the Act and VAA's operation of the Airport pursuant to the Ground Lease. VAA has the ability to carry out the operation of the Airport pursuant to the Ground Lease while simultaneously complying with the Act, and VAA's compliance with the Act would in no way frustrate the fulfillment of any Parliamentary intent.
9. VAA, by its conduct, acknowledges that its licensing of firms to access the Airport's airside is subject to the Act. Section 8.12 of VAA's standard-form "Ground Handling Licence" agreement specifically provides that nothing in that agreement applies or is enforceable to the extent it would be contrary to the Act.

III. NO LEGITIMATE BUSINESS JUSTIFICATIONS

10. To justify its abusive conduct, VAA relies on several alleged business justifications. As described below, VAA's explanations for its conduct in this case do not constitute legitimate business justifications for the purposes of section 79 of the Act. None of VAA's explanations are credible efficiency or pro-competitive rationales for VAA's Practice that are *independent* of the anti-competitive effects of its conduct. Even if credible justifications exist, which is denied, VAA's justifications are insufficient to outweigh VAA's clear subjective intent to exclude or the reasonably foreseeable or expected exclusionary effects of the Practice.
11. **First**, VAA's argument that new entry is not supported because of alleged shrinking demand is countered by the fact that airlines operating at the Airport wish to procure In-Flight Catering from new-entrant firms. At least three international airlines have written letters advocating for additional In-flight Catering competition at the Airport. These letters have been in VAA's possession while new-entrant firms were requesting (and continue to request) authorization to access the airside to provide In-flight Catering at the Airport.
12. Regardless of the size of the market, open competition should determine the number and identity of firms serving the In-Flight Catering marketplace at the Airport, not VAA. Markets are most efficient and consumers are best served when competing firms are free to decide how to compete.
13. **Second**, VAA claims that it is not desirable for In-flight Catering facilities to be located off-Airport, due to ground access issues arising from the Airport's location on an island, and because firms that make investments in facilities off-Airport are less committed to continuing to serve the Airport in the event of a business downturn.

14. Even if access issues exist, which is denied, In-flight Catering firms already operate in Canada from off-airport locations. Their level of service, including on-time performance, meets airline requirements, and is backstopped by level-of-service commitments, and penalties, in contracts with airlines. Whether located on- or off-airport, In-flight Catering firms make significant investments in establishing and maintaining their facilities, and firms located off-airport do not take lightly the commitments and investments they have made.
15. **Third**, VAA claims that after being contacted by new-entrant firms seeking authorization to access the airside to provide In-flight Catering at the Airport it conducted a careful review of the marketplace prior to making any decision. In fact, it was only after VAA had already rejected new entry did VAA conduct any kind of detailed analysis, and the analysis that VAA did conduct cannot, as a matter of fact, support the conclusions that VAA seeks to draw in this case.

IV. VAA'S ILLOGICAL ARGUMENT THAT A LESS COMPETITIVE MARKET IS IN FACT A MORE COMPETITIVE MARKET

16. VAA asserts that there can be no lessening or prevention of competition owing to "vigorous competition" between the incumbent providers of In-flight Catering at the Airport – Gate Gourmet and CLS. The test for a substantial prevention or lessening of competition for the purposes of section 79 of the Act is a relative rather than an absolute one; that there may be competition between Gate Gourmet and CLS is irrelevant to the assessment of whether the relevant market would be substantially more competitive but for VAA's ongoing practice of anti-competitive acts, which it would be in this case.
17. The Commissioner also rejects VAA's proposition that the absolute number of In-flight Catering firms operating at the Airport is indicative of

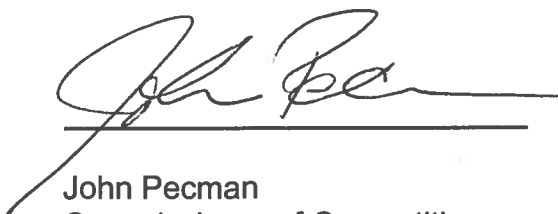
the competitiveness of the relevant market. That new entry may cause an incumbent firm to exit the market does not mean that the result is a less competitive market. To the contrary, vigorous competition in a market, participation in which is not blocked by a gatekeeper's refusal to permit access to a critical input, will deliver quality products and services to customers at competitive prices, including in this case.

18. Finally, airlines cannot exercise material countervailing buyer power at the Airport as VAA asserts. Countervailing buyer power only works if there is a free and contestable market that provides options to airlines for In-flight Catering. VAA's conduct in this case ensures that airlines are captive to the incumbents at the Airport and cannot exercise material countervailing buyer power.

V. CONCLUSION

19. VAA has engaged in and continues to engage in an abuse of a dominant market position relating to the supply of In-flight Catering at the Airport. As described in the Application, VAA has a competitive interest in the market for the supply of Galley Handling at the Airport, and in insulating the incumbent In-flight Catering firms at the Airport from new sources of competition. VAA's practice of anti-competitive acts has, and continues, to harm competition. Accordingly, the Commissioner respectfully requests the Tribunal to grant the relief sought in paragraph 59 of the Application.

DATED AT Gatineau, Quebec, this 28th day of November, 2016.



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Commissioner of Competition

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PUBLIC VERSION

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BETWEEN:

COMMISSIONER OF COMPETITION

Applicant

—and—

VANCOUVER AIRPORT AUTHORITY

Respondent

MOTION RECORD OF VANCOUVER AIRPORT AUTHORITY

(Respondent's Motion Challenging Adequacy and Accuracy of Summaries)

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