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Mr Paul Jackson  
Project Manager  
Competition and Markets Authority  
Victoria House  
37 Southampton Row  
London  
WC1B4AD

**First Trust Bank**  
Regulatory Compliance

First Trust Centre  
PO Box 123  
92 Ann Street  
Belfast  
BT1 3AY

Telephone (028) 9032 5599  
(028) 9024 2423  
Facsimile (028) 9024 2128  
[www.firsttrustbank.co.uk](http://www.firsttrustbank.co.uk)

**RETAIL BANKING MARKET INVESTIGATION**  
**Response to Statement of issues – AIB Group (UK) plc**

We refer to the Statement of issues published on 12 November 2014. In the Statement you requested the views of those submitting evidence to the issues under consideration.

Our key request is that you consider the very different market factors within geographic areas such as Northern Ireland.

Northern Ireland has a population of 1.8 million, less than the population of Liverpool City Region. The structure of the sector is very different to that elsewhere in the UK. We would request that the investigation take time to explore and recognise these differences.

The difference of Northern Ireland has been noted in past studies, including the two market studies which led to this investigation. However, it is mentioned in the Statement only in the context of market definition. We consider that the differences may in fact impact at many levels of your investigation, including:

- practically, the information available for the types of analysis envisaged in the Statement;
- the issues which it is appropriate for you to consider at each stage of your investigation;
- your eventual substantive findings on the structure of the market and its features; and
- the appropriateness of the remedies which you may consider if you identify an adverse effect on competition.

We discussed some of these issues at the data meeting with CMA staff on 26 November. We would of course be happy to continue to assist the CMA with these aspects as the investigation proceeds.

More generally on the Statement, we are only able to respond at a high level. All of the issues identified seem reasonable to include. The weight which each of these should be given in your investigation is much harder to judge. We note that many of these issues have been considered in depth in past investigations into the sector.

We have not identified any further issues for you to consider beyond the issues you have raised.

We trust the above is of assistance. If you have any queries please let us know.

**Yours faithfully**

**Des Moore**  
**Head of First Trust Bank**

