

TixStock response to notice of possible remedies

Dear Sir

Acquisition by PUG LLC of the StubHub Business of EBay Inc

We have followed the CMA investigation of the acquisition of StubHub by Viagogo, including the possible remedies documentation. In the remedies document, you request that interested parties provide views on practical alternative remedies for you to consider. This is the purpose of this communication.

To briefly provide you with some background to our company, we at TixStock have developed a product over the past three years, based upon the input from major brokers across the UK/Europe, which underpins more open competition in the market. Our inventory management platform has been developed specifically for the UK & European market and we are already connected to five secondary marketplaces via our comprehensive API, including StubHub. We are also in conversations with several other marketplaces, including Gigsberg, who you specifically referred to in your findings.

As you will be aware from your market experience, such a product allows brokers to manage their inventory more effectively and push that stock to multiple marketplaces simultaneously. It protects the end-user customer, by ensuring that when tickets are sold on one platform, they are immediately removed from all other platforms. This functionality helps to avoid 'double-selling', with all the issues for the end-user that such circumstances create. In addition, the availability of stock across multiple platforms creates enhanced competition amongst the companies to whom we have an API connection.

We noted in your investigation, that you have concerns about the affect the proposed Viagogo/StubHub merger has upon the access to end-users and the access to stock, both of which reduce the ability for meaningful competition. We feel that our product can directly impact the ability of more companies to access wider levels of stock and this, in turn, allows those companies to compete more effectively for end-user customers due to the enhanced stock availability.

So far, we have not been able to get an API link to Viagogo and therefore brokers still need to input stock twice if they wish to display stock on multiple platforms – once on Viagogo and once to our system where the stock is then forwarded to multiple other sites. TixStock feel that were Viagogo compelled to share their stock via our platform or any other inventory management system, the playing field on the availability of stock would be significantly more competitive. With greater availability of stock for all brokers, end-users would have greater choice in selecting a platform from which to purchase tickets.

We have been in contact with Viagogo to present our product. We recognise that with the market currently being in turmoil and the proposed merger, we will not be at the top of the agenda for discussion about creating an API with us. We do however see the use of an inventory management system to provide access to stock across the market, as a very straightforward step to enhancing competition.

We would be happy to provide more information to you or discuss how inventory management systems can level the playing field in a meaningful way.

We hope this input is useful for you and that it could in some way help to facilitate a way forward with the current situation.