ALMR

SUBMISSION TO OFCOM

INVESTIGATION INTO THE UK PAY TV INDUSTRY

The Association of Licensed Multiple Retailers (*ALMR*) welcomes the opportunity to respond to OFCOM's second consultation on the market for pay tv in the UK. As the only national trade body dedicated to representing the interests of licensed retailers – the majority of commercial pay tv subscribers - the *ALMR* and its members are directly affected by the conclusions reached by OFCOM.

This investigation was first launched in March 2007, and since that date commercial pay tv subscribers have seen two successive price increases. This makes the move towards a conclusion ever more pressing, and we welcome the apparent willingness to intervene in the market to address competition concerns.

We concur with OFCOM's assessment in its headline summary that the limited retail competition in the pay tv market does not deliver a good outcome for consumers. This is as true for commercial subscribers as it is for domestic. Indeed, the effects of this lack of competition are felt more keenly by commercial customers. We are therefore particularly disappointed that OFCOM has not taken this opportunity to address what even the consultation document acknowledges to be very real and significant structural problems within the commercial pay tv market.

We have focused our comments solely on the commercial retail market and the provision of premium sports broadcasting to those customers. We have not commented on issues which do not affect the service provided to our members. For ease of reference we have grouped our comments in the order in which they appear in the consultation document.

Market Structure and Definition

The OFT has maintained a watching brief over BSkyB's activities over the past decade and there have been a number of formal inquiries. As a result there is extensive analysis of the broadcasting market and BSkyB's position in it. OFCOM's latest consultation document re-confirms and re-states the conclusions reached in earlier inquiries.

Both the OFT's 1996 and 2002 inquiries concluded that pay TV was a discrete market and that it could be sub-divided further into distinct markets according to broadcast content – notably premium sports and movie channels. The OFT in December 2002 concluded that the retail supply of channels containing sports content is no wider than content that is unique to pay-TV. We concur with this.

In our earlier submission (April 2008), we provided evidence of the importance of premium sports content to commercial subscribers, and in particular of access to live premiership football. All respondents said that this was the main reason for subscribing and described it as a 'must have'. In common with domestic subscribers, many respondents identify sports other than football as being 'must have' – 48% said rugby, 8% cited cricket and 4% cited other sports – but it is clear that live premier league football drives subscriptions.

We therefore support and agree with OFCOM's conclusion that there is a narrow economic market for the wholesale of certain premium sports channels and with its use of the term 'core premium sports' to describe them. We would dispute that all sports or free to air sports should be included as these are not substitutes for the core content.

The Association of Licensed Multiple Retailers
9B Walpole Court, Ealing Studios, London, W5 5ED
Tel: **020 8579 2080** Fax: 020 8579 7579 E-mail: info@almr.org.uk
Registered office – as above. Registered England No: 3964186

We would also support the conclusion that Sky has significant power in this market and other related ones. In terms of commercial subscriptions, it is the sole provider of such content and has 100% market share. Despite the European Commission's intervention, Sky still exclusively wholesales and retails all live premiership football to commercial subscribers. Even commercial subscribers wishing to access Setanta broadcasts must do so through Sky – either as a buy through from an existing contract or as a stand alone package. A commercial subscriber wishing to receive only Setanta broadcasts must still contract with Sky. Sky retails and controls access to its competitor's product.

In its summary analysis (page 8 1.29) OFCOM states that it is unlikely that a satisfactory answer to our competition concerns is for Sky to become the only actual or potential retailer of premium content across all platforms. In the commercial market, that is effectively what we see. We are at a loss to understand why this would not be a satisfactory outcome in one segment of the market but will be allowed to continue unchecked in another.

We also concur with the conclusion – also reached by previous competition investigations - that the vertically integrated nature of BSkyB's businesses allows it to exert this market power not only on the wholesale market but also up- and down-stream. In particular their control over the exclusive broadcasting rights reinforces their dominance in the market for the supply of such channels – allowing it to set subscription levels and wholesale prices independent of the market and hence to outbid rivals for rights. The possession of exclusive rights is the main driver of subscriptions to pay TV and has enabled BSkyB to establish itself in, and profit from, the retail market.

We agree with OFCOM's conclusion that Sky has an incentive to restrict content and set high wholesale prices as a result of this market power. The paper explores the potential effects of this on competition at the retail level if left unchecked. Whilst it states that these are anticipated outcomes, one need only look at the commercial retail market to see the stark reality of what happens when Sky's significant market power is left unchecked – competitors are squeezed out of the market, retail prices are increased, consumers are left with limited choice and innovation is stifled.

Consumer Outcomes

The consultation document states that competition is likely to be weakened by restricted distribution of Core Premium Channels. We concur with this and would note that distribution is severely restricted in the commercial market as such content is only available via one platform and one retailer. The weakening of competition and the adverse impact on consumers is therefore felt more keenly in the commercial retail market.

Limited retail competition is likely to manifest itself in terms of reduced choice, limited platform innovation or higher prices. We are broadly in agreement with these criteria for the assessment of the impact of Sky's market power, and have the following comments to make with regard to the commercial pay tv market:

- **Available on all platforms:** OFCOM suggests that content that consumers' value highly should be available on a broad range of platforms. Commercial pay tv customers have no choice of platform. If they want to access premium sports content, they must subscribe to Sky.
- **Broad range of content bundles:** OFCOM anticipates that a market in which there was effective retail competition might result in different retailers providing a variety of services and entry level packages as well as the ability to purchase on a stand alone basis. It states that the entry of Setanta has helped to achieve this. This is not the

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case for commercial subscribers. In the commercial pay tv market, there are no competing retailers and Sky provides a very limited variety of content bundles – a variety which has significantly declined over the course of the investigations. In the last round of price increases, Sky reduced its packages to from 4 to just 2 options – a basic and an advanced service with the entry level package providing much reduced coverage – missing almost all of the 'must see games' such as England World Cup Qualifiers and some of the major competition matches - for proportionately higher price. The pricing of these packages, particularly the stand alone entry level packages, is such as to encourage trading up to the full service. Sky therefore uses its market power and ability to control the pricing not only of its own but its competitor's products to 'tie in' customers to its full service.

- **Platform innovation:** whilst Sky has a strong history of innovation in its satellite platform, the exploitation of market power in the commercial sector has arguably led to reduced innovation overall in the commercial sector. It has resulted in the complete absence of competing platforms and there is therefore not the same level of incentive to continue to innovate and offer new features to commercial customers. It also acts as a disincentive for new and emerging platforms, different types of service such as content on demand and the bundling of other media services eg telephony, broadband and pay tv, which we have seen in the domestic sector. No such similar service exists in the commercial sector and commercial customers are therefore unable to take advantage of the technological efficiencies and pricing levels open to domestic subscribers.

- **Fair pricing:** Our earlier submission in November 2007 detailed the level of price increases imposed on the commercial retail sector. This has continued, with two successive price increases of 11-13% (on average) during the course of the current investigation. Evidence from our membership suggests that the average cost of a Sky subscription now stands at £15,000 per annum. On average, across all price bands. Commercial fees have increased by 22% year on year since 1996. In linear terms, the fees have increased by more than 400% since that date.

  From September 2008, the cost of the freestanding subscription to just the Setanta Channels will rise to between £735 for the smallest pubs (21.5% increase) to £22,935 for the largest (750% increase).

We would argue that the potential risks to competition identified by OFCOM in its analysis have already come to pass in the commercial market. Judged by its own criteria, this does not provide a good set out outcomes for consumers. Again, we are at a loss to understand why this situation will therefore be left unchecked.

In addition to the above criteria, we would also like to draw attention to the specific harm arising in the commercial retail market, with customers being priced out of the platform. We have presented clear evidence in a succession of submissions that commercial customers are being denied access to the market as a result of Sky's pricing policy for commercial subscriptions.

Information on BSkyB's commercial customer base is not readily available. The company's 2007 annual report states that it has 40,000 commercial subscribers, 2,000 fewer than in 2005. Whilst these figures are not broken down by company type, the report does state "the majority … are pubs and clubs". In 2003, the company estimated that around half of all UK pubs were direct subscribers. In contrast, just fewer than 7% of all commercial premises are BSkyB subscribers.

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We have been unable to find comparable figures in BSkyB's 2008 annual report, but based on the evidence we have received from members in successive surveys, we would anticipate that it will have declined further following the most recent price increase in July 2008. In anecdotal evidence, several large operators suggested that there had been a year on year decline in subscription levels within their estate in direct proportion to the scale of the price increase ie the total company budget for Sky remained the same. We would therefore anticipate a decline in subscription numbers of around 11% over the course of the year.

In 2002/3, when we first presented evidence to the OFT, our survey returns agreed with Sky's assessment of around half of all pubs subscribing to Sky. This has steadily declined since that date. Our survey evidence in 2007 suggested a market penetration of 41% (endorsed by findings from a Morning Advertiser survey) and this had declined to just 39% when we re-surveyed members about the effect of the 2007/08 price increase. We asked respondents to provide information on the total size of their estate and the total number of subscriptions within that estate as at March 2008, March 2007 and March 2003.

	Total estate	Total no subscriptions	Proportion subscribing
March 2008	2479	966	39%
March 2007	2501	1046	42%
March 2003	1824	928	49%

The smaller estate in 2003 is largely due to the fact that several respondents were unable to provide accurate data from this period and this explains why numbers of subscriptions do not decline in real terms. The results reveal a 20% decline in subscriptions levels since 2003 and a 7% decline in the past year alone.

Over the summer, CGA Market Research carried out a further survey for us following the announcement of the 2008/09 price increases. This was a much smaller sample of outlets, but suggested that just 34% of pubs were now subscribing to Sky. We would be happy to repeat this exercise with a broader subscriber base to estimate the true decline in subscriber numbers.

Clearly there are many reasons behind such a shift in subscription levels and coverage within the managed estate – change in business or trading style, the greater emphasis on food, changes in the programming – but the price of the service is also a key factor. We therefore asked companies whether they had specifically cancelled a contract in the past year as a direct result of the most recent price increase. Two thirds of companies indicated that they had done so in 150 cases. Operators also indicated that the increased price meant that they were now reconsidering subscriptions in sites which, 5 years ago, Sky would have been an integral feature.

This finding is reinforced by evidence in both surveys from non-subscribing outlets. Respondents were split equally on the reasons why they did not subscribe – a third each cited the cost, that it was not part of their business model and that they would never use the service. 14% said that they would subscribe if the commercial deal was better. Given that a third rated the service too expensive, this suggests that the price is significantly higher than potential subscribers would consider acceptable. This is an extremely small sample, but it does give an indication of pubs and bars being priced out of the market, unable to afford a product they would otherwise take if the commercial deal was better.

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In order to test this assumption, we also asked respondents whether they would increase the number of subscriptions if the commercial deal was better. In order to assess this, we took the price of the subscription for a pub of average rateable value at 2000 and increased it by the rate of inflation over the period to give an adjusted 2008/9 average price of £8,500. This is considerably less than the survey average of £15,000 but may still result in an inflated price.

22 companies said that they would increase their number of subscribing outlets, adding a further 335 sites to the base level – an increase of some 53% in subscription levels. A further two companies indicated that they would increase subscriptions but could not give exact figures on numbers as they would carry out this assessment on a case by case basis. The proportion of the total estate subscribing to Sky would also increase – from 39% to 53% of outlets (although taking an average across the respondents indicating they would increase subscription levels suggests that this may be an under-estimate and a figure of closer to 70% may be more realistic)

These findings are corroborated by a further on-line survey carried out through the Morning Advertiser website in mid 2008. This is a self-selected sample and covers just 139 respondents, so the results need to be treated with caution, but are nevertheless informative. This survey focused specifically on non-subscribers and potential Sky customers. All of them cited cost as the reason for not subscribing. Of these, 55% had never subscribed to Sky services, but 45% had done so in the past. In a separate question addressed to all respondents, 45% said that they had cancelled one or more subscriptions in the past year: over 90% of these were on the grounds of cost alone.

All of the above is clear evidence of commercial customers and potential customers being priced out of the market.

Whilst the numbers switching off are the most tangible evidence of consumer harm, it is clear that high prices to have other, more indirect effects on the businesses concerned – higher prices impact on the ability of the outlet to invest in its pay tv offering eg upgrading to HD, invest in its services, its outlet and its staff. Equally, an outlet which decides to continue with its subscription may have to put up prices to cover these costs and/or cut back on facilities and services to customers.

Remedies

We are in broad agreement with OFCOM's economic and competition analysis which leads it to recommend the introduction of a wholesale supply obligation and regulated pricing as the only remedy which will eliminate Sky's ability to act on the incentives to distort competition in the market. This analysis could equally be applied to the commercial market – where the effects on competition are already clearly felt and readily identified – and we are therefore at a loss to understand why OFCOM is not proposing to extend the remedy to these customers.

The fact that Sky has already distorted competition in this segment of the retail market – by using its position and power to effectively eliminate competitors by refusing to supply or supplying only on terms which impose an unacceptable squeeze on margins – should not be used as an excuse to avoid addressing the situation. If left unchecked, the situation will simply worsen and competition will be further weakened. This is simply unacceptable.

Whilst we acknowledge OFCOM's concern that a wholesale supply obligation may leave retail prices unaffected, we nevertheless believe that it would be a helpful intervention – perhaps one in a series of - in the market and could lead to benefits to commercial subscribers. The injection of any form of competition can only have a beneficial effect and

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may provide at the very least a check on Sky's perception that it can impose price increases unfettered by competition concerns.

We have been told by several pay tv operators in discussions with them in early 2007 that Sky has denied them access to premium sports content and we have also provided clear evidence to OFCOM of Sky's manipulation of the wholesale price mechanism in 2002/3 in respect of NTL (attached again as appendix) which demonstrates that Sky, if left to its own discretion, would use its market power to supply on sub-economic terms and squeeze competitors' margins. We have also been told by the parties to the original complaint that they would seek to supply the commercial market if a wholesale supply obligation were imposed.

A real competitor to Sky is not going to be able to break into the commercial retail market without a wholesale supply obligation and regulated terms. The extension of the remedy is therefore an essential precursor to addressing pricing issues in the market. We therefore have reason to believe that the extension of the remedy to commercial customers would have a positive effect on competition within the market.

Moreover, whilst pricing is the principal issue of concern to commercial subscribers, it is by no means the only one, and the extension of the remedy to this element of the market could inject much needed innovation in terms of product offering, both in terms of bundling of programme content and bundling of other media services.

We have surveyed our members to assess whether there would be demand for a new service. In 2001, when there was a viable competitor in the market place, just over 17% of *ALMR* members subscribed to cable services. Whilst a small number cited price as a reason for this, others referred positively to the ability to subscribe to a more tailored package of content, better reception, the bundling of services with other media.

In our more recent 2008 survey, 44% of current Sky subscribers said that they would be interested in subscribing to a more tailored or limited service as opposed to the 'full service' provided by Sky. 28% said that they would be interested in live premiership football only – suggesting that a programme based around Sky Sports 1 and Setanta would have a significant market – and 16% would opt for a pick and mix approach or pay per view.

Respondents were even willing to pay more per game for the ability to choose reduced programming. Many small tenants, for example, are willing to bring in televisions for a one off major game or event but could not justify a year-round subscriptions. Similarly many food led outlets or bars for whom sport is not a prime driver of footfall would like to have the ability to show the occasional match.

Whilst the introduction of a wholesale supply obligation in and of itself would not address commercial subscribers' concerns about price, it would address the unmet demand for a wider range of programme options. It may also assist in providing a genuine entry level package for smaller retailers.

By supplying competing platforms on uneconomic terms, there has been one standard pricing model and competitors are unable to innovate on pricing. Sky's control of content has also restricted its competitor's ability to compete on service and range of offering. For example, by restricting access to attractive content, competitors are unable to develop alternative packages of sports broadcasting for certain activities or tournaments, for example.

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Moreover, pub and club customers have effectively been denied the ability to make use of the cable platform. There has been no comparable bundling of telephony and broadband services to commercial customers. The attractiveness of alternative offerings may also be boosted by the ability of other retailers to bundle with other media services.

Finally, the consultation paper suggests that the extension of a wholesale supply obligation to the commercial sector may not be appropriate because the pricing structure is unclear. Whilst we acknowledge that the pricing structure is more complicated, based as it is on rateable value, it is nevertheless clear and, whilst not popular, is well understood. Ratecards are publicly available and price increases are well publicised. In an *ALMR* survey in 2008, 42% of pub and club operators would prefer a charging formula based on a combination of square footage of the viewing area, average number of attendees and number of events. A similar system is in place for the licensing of recorded music in pubs and bars.

Sky has consistently and publicly stated in meetings with the *ALMR* that it would be willing to consider an alternative mechanism for determining price in the commercial market. The apparent complexity of the pricing mechanism should not of itself be a reason for rejecting a wholesale supply obligation.

Alternative Remedies
If the wholesale supply obligation is not to be extended to commercial subscribers, then we believe that further intervention will be required to address the competition concerns arising in the commercial retail market. Judged against OFCOM's own criteria for assessing consumer outcomes, retail competition is weak and consumer interests are suffering as a result. It is not, therefore, tenable to leave it unaddressed. We believe consideration should be given either to referring this specific aspect of the market to the Competition Commission or exploring a cap on retail price increases as an alternative remedy.

Conclusion
We hope that this information is helpful in your continuing deliberations. We would very much welcome the opportunity to meet with you and your colleagues to discuss the ongoing investigation and the need to focus on commercial pay TV customers in particular.

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APPENDIX I

BSKYB CURRENT PUB AND CLUB AGREEMENT AND 2008 RATECARD

- Pub and Club - UK
- Establishment - BL, CSS, CSW, HO, LF, OTH, PH, POL, PS, SU
- Band Definition - RV

RV Band			A	B	C	D	E
Band Range		From To	£10 £2,750	£2,751 £4,300	£4,301 £5,750	£5,751 £7,450	£7,451 £9,300
upto 31/08/07	**Subscription**	Option 1	£80.00	£157.00	£201.00	£278.00	£336.00
		Option 2 & 3	£85.00	£162.00	£206.00	£283.00	£341.00
		Option 4	£90.00	£167.00	£211.00	£288.00	£346.00
		Sky+	£10.00	£10.00	£10.00	£11.00	£13.00
from 01/09/07	**Subscription**	Option 1	**£89.00**	**£175.00**	**£223.00**	**£308.00**	**£373.00**
		Option 2 & 3	**£94.00**	**£180.00**	**£228.00**	**£313.00**	**£378.00**
		Option 4	**£99.00**	**£185.00**	**£233.00**	**£318.00**	**£383.00**
		Sky+	**£10.00**	**£10.00**	**£10.00**	**£11.00**	**£13.00**
Football+		Season Ticket Only	**£605.00**	**£790.00**	**£905.00**	**£1,070.00**	**£1,355.00**

RV Band			F	G	H	I	J	K
Band Range		From To	£9,301 £11,900	£11,901 £15,000	£15,001 £19,300	£19,301 £25,000	£25,001 £33,000	£33,001 £42,000
upto 31/08/07	**Subscription**	Option 1	£417.00	£490.00	£569.00	£620.00	£721.00	£822.00
		Option 2 & 3	£422.00	£495.00	£574.00	£625.00	£726.00	£827.00
		Option 4	£427	£500	£579	£630	£731	£832
		Sky+	£17.00	£20.00	£23.00	£25.00	£29.00	£33.00
from 01/09/07	**Subscription**	Option 1	**£464.00**	**£545.00**	**£630.00**	**£690.00**	**£800.00**	**£915.00**
		Option 2 & 3	**£469.00**	**£550.00**	**£635.00**	**£695.00**	**£805.00**	**£920.00**
		Option 4	**£474.00**	**£555.00**	**£640.00**	**£700.00**	**£810.00**	**£925.00**

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		Sky+	**£17.00**	**£20.00**	**£23.00**	**£25.00**	**£29.00**	**£33.00**
Football+		Season Ticket Only	**£1,520.00**	**£1,635.00**	**£1,690.00**	**£1,805.00**	**£1,915.00**	**£1,970.00**

RV Band			**L**	**M**	**N**	**O**	**P**	**Q**
Band Range		From To	£42,001 £52,000	£52,001 £65,000	£65,001 £83,000	£83,001 £110,000	£110,00 £125,000	£125,001 £140,000
upto 31/08/07	**Subscription**	Option 1	£895	£945	£1,060	£1,290	£1,540	£1,780
		Option 2 & 3	£900	£950	£1,065	£1,295	£1,545	£1,785
		Option 4	£905	£955	£1,070	£1,300	£1,550	£1,790
		Sky+	£36.00	£38.00	£42.00	£52.00	£62.00	£71.00
from 01/09/07	**Subscription**	Option 1	**£995.00**	**£1,050.00**	**£1,180.00**	**£1,435.00**	**£1,710.00**	**£1,980.00**
		Option 2 & 3	**£1,000.00**	**£1,055.00**	**£1,185.00**	**£1,440.00**	**£1,715.00**	**£1,985.00**
		Option 4	**£1,005.00**	**£1,060.00**	**£1,190.00**	**£1,445.00**	**£1,720.00**	**£1,990.00**
		Sky+	**£36.00**	**£38.00**	**£42.00**	**£52.00**	**£62.00**	**£71.00**
Football+		Season Ticket Only	**£2,040.00**	**£2,095.00**	**£2,165.00**	**£2,215.00**	**£2,265.00**	**£2,310.00**

RV Band			**R**	**S**	**T**	**U**	**V**	**W**
Band Range		From To	£140,00 £150,000	£150,00 £170,000	£170,00 £220,000	£220,00 £300,000	£300,00 £550,000	£550,001+
upto 31/08/07	**Subscription**	Option 1	£1,990	£2,120	£2,240	£2,320	£2,400	£2,500
		Option 2 & 3	£1,995	£2,125	£2,245	£2,325	£2,405	£2,505
		Option 4	£2,000	£2,130	£2,250	£2,330	£2,410	£2,510
		Sky+	£80.00	£85.00	£90.00	£93.00	£96.00	£100.00
from 01/09/07	**Subscription**	Option 1	**£2,210.00**	**£2,355.00**	**£2,490.00**	**£2,580.00**	**£2,670.00**	**£2,780.00**
		Option 2 & 3	**£2,215.00**	**£2,360.00**	**£2,495.00**	**£2,585.00**	**£2,675.00**	**£2,785.00**
		Option 4	**£2,220.00**	**£2,365.00**	**£2,500.00**	**£2,590.00**	**£2,680.00**	**£2,790.00**
		Sky+	**£80.00**	**£85.00**	**£90.00**	**£93.00**	**£96.00**	**£100.00**
Football+		Season Ticket Only	**£2,390.00**	**£2,440.00**	**£2,495.00**	**£2,560.00**	**£2,615.00**	**£2,650.00**

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APPENDIX II

CONFIDENTIAL ANNEX

WHOLESALE PREMISES SUPPLY AGREEMENTS

The Association of Licensed Multiple Retailers
9B Walpole Court, Ealing Studios, London, W5 5ED
Tel: **020 8579 2080** Fax: 020 8579 7579 E-mail: info@almr.org.uk
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