**LIDC Congress 9-12 October 2025, Vienna
Questionnaire for question A**

**Is the concept of the abuse of relative market power beyond market dominance necessary to ensure a functioning competition and what criteria should be used to assess it?**

**International reporter**: **Pranvera Këllezi** PhD in law, LLM College of Europe (Bruges)

Attorney at law, Këllezi Legal, Geneva, Switzerland

Member of the Swiss Competition Commission

Lecturer, Faculty of law, University of Neuchâtel

E-Mail: pranvera.kellezi@kellezi-legal.ch

**Background and context**

The term ‘relative market power’, also known in other jurisdictions as ‘economic dependence’, superior or unbalanced bargaining power’ or ‘significant imbalance in commercial relations’, is used to describe circumstances in which a company exploits its superior bargaining position vis-à-vis business partners. These rules exist all over the world, from Europe to South Korea or Brazil. In contrast to the traditional concept of dominance, the concept of relative market power is concerned with the analysis of asymmetric dependencies or bargaining positions in business-to-business (B2B) relationships, irrespective of a dominant market position or monopoly power in the traditional sense. This is relevant to business-to-business relationships, including distribution, franchising, subcontracting, supply chains and others, in both traditional and digital markets.

This additional tool for regulating unilateral conduct has recently received renewed attention, reflecting a broader trend in the regulation of business-to-business (B2B) relationships. In recent years, several jurisdictions in Europe, including France, Belgium, Switzerland and Austria, have introduced or updated legislation targeting the abuse of economic dependence or relative market power. The proliferation of these legislative measures highlights the need for transparent, predictable and enforceable criteria for assessing relative market power, situations of dependence and imbalances in bargaining power in the B2B context. It also raises the question of the extent to which such provisions serve to maintain effective competition and thus form part of competition, anti-monopoly or antitrust law as it is commonly understood. This study aims to examine how these criteria are applied in practice, the challenges of enforcement and the wider implications of this regulatory trend for competition policy and the economy.

The following list of questions should be understood as a reminder of issues that may rise in the relevant jurisdiction. National rapporteurs are free to structure the report as they wish, covering only issues relevant to their jurisdiction or discussing other issues arising in their jurisdiction that are not mentioned in this questionnaire.

1. **Introduction: Origin and Development of the Rules in your Jurisdiction**

Does your jurisdiction have rules or case-law dealing in one way or another with relative market power or economic dependence?

**Answer:** No. The concept of relative market power is not recognised under Singapore Competition law.

The closest concept in Singapore is abuse of dominance under Section 47 prohibition of the Competition Act 2004 of Singapore (the “**Section 47 Prohibition**”). The Section 47 Prohibition requires a dual finding that the undertaking in question holds a dominant position within a relevant market, and that it has engaged in conduct that constitutes an abuse of that position.[[1]](#footnote-1)

However, unlike relative market power which focuses on the dynamics between specific businesses, and prohibits abusive conduct by an undertaking with “relative market power” which may not amount to a dominant position in a market, the Section 47 Prohibition in Singapore relates to whether an undertaking whether an undertaking holds a dominant position in the relevant market.

What is the nature of the rules: are they part of competition law or other specific laws or general contract law? Where is there discussion or debate about how best to deal with such concerns?

**Answer:** N.A.. As explained above, the concept of relative market power is not recognised under Singapore Competition law.

In the context of the Section 47 Prohibition, the rules are part of competition law, within the Competition Act 2004 of Singapore (“**Competition Act**”).

Further discussion on the assessment of market power may be found under the “*CCCS guidelines on the Section 47 Prohibition*” (the “**Section 47 Guidelines**”) issued by the Competition and Consumer Commission of Singapore (“**CCCS**”), the relevant competition authority in Singapore.

When were rules on relative market power or abuse of economic dependence introduced in your jurisdiction? Discuss how the rules and their implementation have evolved over the years.

**Answer:** N.A.. Rules on relative market power do not exist under Singapore Competition law.

In the context of the Section 47 Prohibition:

The Competition Act, which governs competition law in Singapore, came into force in 2004. Previously, there were rules against anti-competitive behaviour only in specific sectors like energy and telecommunications.[[2]](#footnote-2)

Singapore’s Competition Act was largely modelled after the UK’s Competition Act 1998.[[3]](#footnote-3) As such, with the enactment of Singapore’s Competition Act, the concept of substantial market power, as it was applied in the UK (i.e., in the larger assessment of abuse of dominance), was applied in Singapore.[[4]](#footnote-4) As of 2025, there has been little change in this position.

Which companies or economic sectors lobbied for the introduction of the rules?

**Answer:** N.A.. Rules on relative market power do not exist under Singapore Competition law.

Are these rules sector-specific ones or, on the contrary, general ones? In the latter case, are they applied to specific sectors or industries?

**Answer:** N.A.. Rules on relative market power do not exist under Singapore Competition law.

In the context of the Section 47 Prohibition, rules on abuse of dominance are general ones that are applied on a case-by-case basis by the CCCS.

Under the Third Schedule to the Competition Act, the Section 47 Prohibition does not apply to undertakings entrusted with the operation of services of general economic interest, conduct required for compliance with laws, conduct necessary for reasons of public policy and that is also the subject of an order by the Minister for Trade and Industry, and conduct resulting in a merger. The following specified activities are also excluded from the Section 47 Prohibition:

1. the supply of ordinary letter and postcard services by a person licensed and regulated under the Postal Services Act;
2. the supply of piped potable water;
3. the supply of wastewater management services, including the collection, treatment and disposal of wastewater;
4. the supply of bus services by a licensed bus operator under the Bus Services Industry Act 2015;
5. the supply of rail services by any person licensed and regulated under the Rapid Transit Systems Act;
6. cargo terminal operations carried out by a person licensed and regulated under the Maritime and Port Authority of Singapore Act; and
7. conduct that relates to the clearing and exchanging of articles undertaken by the Automated Clearing House established under the Banking (Clearing House) Regulations or any related activities of the Singapore Clearing House Association.

Has your jurisdiction enacted, or proposed the introduction of, *ex ante* regulation that deals with relative market power or economic dependence?

**Answer:** N.A.. The concept of relative market power is not recognised in Singapore.

In the context of the Section 47 Prohibition under the Competition Act, the CCCS has the power to impose interim measures directions before it has completed its investigation of a suspected infringement of the Section 47 Prohibition, when it considers that it is necessary to act urgently either to prevent serious, irreparable damage to a particular person or category of persons, or to protect the public interest.

In sectors that are governed by sector-specific regulations, however, there are *ex ante* regulation that prevent abuse of dominance. For example, in the media industry, Part 6 of the *Media Development Authority of Singapore Act – Code of Practice for Market Conduct in the Provision of Media Service* (the “**Code**”)issued by the Media Development Authority confers powers on the the Media Development Authority to take any enforcement measures, including warnings, orders to cease and desist or directions for any contravention of the Code, which prohibits an abuse of dominant position.[[5]](#footnote-5)

Who is responsible for enforcing the rules?

**Answer:** N.A.. Rules on relative market power do not exist in Singapore.

In general, the CCCS, the competition regulator of Singapore, enforces competition rules. As Singapore’s competition regulator, the CCCS can investigate and adjudicate anti-competitive conduct, issue directions to stop and/or prevent anti-conduct activities and impose financial penalties.

Parties who have suffered loss or damage as a result of an infringement of the Section 47 Prohibition may pursue private actions in civil courts. However, private actions can only be pursued after the CCCS has made a final determination of infringement, and in the event the decision is subject to an appeal, upon the expiry of the appeal period, or upon determination of the appeal if an appeal is brought. [[6]](#footnote-6)

Are there many applications of these rules?

**Answer:** N.A.. Rules on relative market power do not exist under Singapore Competition law.

In the context of substantial market power, there is one main application of the rules – determining if an undertaking is in a dominant position.

1. **Criteria for the Definition of Relative Market Power or of Similar Concepts**

**2.1. Definition of Relative Market Power or of Similar Concepts**

Does the legislative text contain a definition and/or criteria of relative market power or similar concepts?

**Answer:** N.A. Relative market power and similar concepts do not exist under Singapore Competition law.

On the Section 47 Prohibition:

The concept of dominance in Singapore is considered equivalent to an undertaking having substantial market power. Substantial market power, in turn, arises where an undertaking does not face sufficiently strong competitive pressure and can be thought of as the ability to profitably sustain prices above competitive levels, or to restrict output or quality below competitive levels[[7]](#footnote-7)[[8]](#footnote-8).

In assessing whether an undertaking has substantial market power, as a starting point, the CCCS will generally consider a market share in excess of 60 per cent as a likely indication that an undertaking is dominant in the relevant market. However, dominance can be established at lower market shares, depending on an assessment of all relevant factors. These relevant factors include[[9]](#footnote-9):

1. Existing competitors that buyers might switch to, which may be assessed through market shares of competitors in the relevant market, as well as the barriers to expansion, the degree of innovation, product differentiation, the responsiveness of buyers to price increases and the price responsiveness of competitors;
2. Potential competitors relating to the possibility that undertakings will enter the relevant market and gain market share, which require consideration of sunk costs, access to key inputs and distribution outlets, regulation, economies of scale, network effects and potential exclusionary behaviour by incumbents; and
3. Other factors, such as the existence of powerful buyers and economic regulation.

Do the criteria defined in the legislative texts differentiate according to the nature of the parties (customer or supplier) or the nature of the relationship?

**Answer:** N.A.. No such criteria exist.

In the context of the Section 47 Prohibition, the prohibition applies to “undertakings”, or any natural or legal person who is capable of engaging in economic activity, regardless of its legal status and the way in which it is financed. There is no further differentiation between the nature of the parties or the relationship.

To what extent is the concept of ‘intermediation power’ accounted for?

**Answer:** N.A.. Such concept does not exist.

What elements of the criteria are defined in the legislation and what criteria have been developed through decision-making practice and case law?

**Answer:** N.A.. Rules on relative market power do not exist in Singapore.

In relation to the Section 47 Prohibition, the following types of conduct potentially amount to an abuse of dominance, depending on all the facts and circumstances:

1. predatory behaviour;
2. loyalty-inducing discounts or rebates;
3. price discrimination;
4. margin squeeze;
5. tying and bundling;
6. refusal to supply access to an essential facility or good; and
7. exclusive contracting.

The test for abusive conduct was set out by the Singapore Competition Appeal Board (“**CAB**”) in its hearing of the appeal arising from *SISTIC.com v Competition Commission of Singapore (Appeal No. 1 of 2010 to CCS 600/008/07)* (the “**SISTIC Decision**”). Specifically, the CAB held that ‘*an abuse will be established where a competition authority demonstrates that a practice has, or [is] likely to have, an adverse effect on the process of competition*’. In making this assessment, the CCCS conducts an economic effects-based assessment that will generally be centred on the degree to which the conduct in question forecloses (or has the potential to foreclose) the competitors of the dominant undertaking from being able to compete effectively in the relevant market.

Are there any legal or factual presumptions?

**Answer:** As stated above, as a starting point, the CCCS considers a market share above 60 per cent. as likely to indicate that an undertaking is dominant in the relevant market. However, the starting point does not preclude dominance being established at a lower market share[[10]](#footnote-10).

**2.2. Criteria Related to the Market**

Are there criteria related to the market, the market structure or the market shares of the companies in the market?

**Answer:** N.A.. Rules on relative market power do not exist in Singapore. However, the CCCS considers a market share above 60 per cent. as indicative that an undertaking is dominant in the relevant market. It must be noted that 60 per cent. market share is a guide, not “criteria” per se.

Is there a market definition? Is the definition of the relevant market a prerequisite?

**Answer:** The first step in the assessment of whether an undertaking holds a dominant position is for the CCCS to consider the relevant market. In doing this, the CCCS adopts the use of a hypothetical monopolist test to define markets conceptually. The test aims to identify products that buyers consider substitutable and then identify undertakings that can supply the focal product and its substitutes. In practical terms, the CCCS considers a number of demand-side considerations (including switching costs, patterns in price changes, own or cross-price elasticities and product characteristics, among other factors) and supply-side considerations (including the ease of supply-side substitution, evidence of existing capacity and buyer preferences, among other factors). The CCCS will also consider its own earlier decided cases (if any are relevant to the case at hand) and market definition assessments in overseas jurisdictions (where these may be relevant in light of the unique market circumstances in, and appropriate market definition for Singapore).

If one of the criteria is alternatives for the undertaking that is dependent on another undertaking with relative market power, how are these alternatives assessed? Are the alternatives discussed in relation to the relevant market and the substitutability criteria, or can the alternatives be found outside the relevant market (e.g. in other goods or services)?

**Answer:** N.A.. The concept of relative market power is not recognised under Singapore Competition law.

In the context of the Section 47 Prohibition, countervailing buyer power, which relates to the commercial significance of the buyer(s) to the seller, is viewed as a possible constraint on an undertaking’s market power. In this analysis, the availability of alternatives (e.g., the ability to switch to another supplier and ability to produce the product themselves) may increase countervailing buyer power and hence constraint the relevant undertaking’s market power.

The CCCS would consider countervailing buyer power in its assessment of whether an undertaking is in a position of market power.

What is the relationship between relative market power and the classic institution of dominance? Is economic dependence or relative market power a criterion for dominance?

**Answer:** N.A. The concept of relative market power is not recognised under Singapore Competition law.

Has there been a finding of relative market power in parallel with a finding of dominance? Conversely, has relative market power been denied in the presence of dominance?

**Answer:** N.A.. The concept of relative market power is not recognised under Singapore Competition law.

How does the analysis change in the presence of two-sided, or multi-sided, markets?

**Answer:** N.A.. The concept of relative market power is not recognised under Singapore Competition law.

In the context of the Section 47 Prohibition, in the presence of two-sided or multi-sided markets, the analysis shifts from focusing solely on price level to also considering price structure. Unlike one-sided markets, where price level is a key determinant of competition, two-sided markets require a holistic approach that integrates both the level and structure of prices across different sides.

In a two-sided market, a dominant player may strategically manipulate the price structure to limit competition on one side of the market, while exploiting consumers on the other, resulting in reduced output and welfare loss. Therefore, competition analysis in two-sided markets must account for both price level and price structure to properly assess market dynamics and potential anticompetitive behaviour.[[11]](#footnote-11)

**2.3. Criteria Related to the Company having a Relative Market Power**

Are there criteria that related to the size, turnover, products, brands or other elements of the company under investigation of relative market power?

**Answer:** N.A.. The concept of relative market power is not recognised in Singapore.

How are these assessed?

**Answer:** N.A.. For the Section 47 Prohibition, see Question 2.1 above.

**2.4. Criteria related to the Company in a Dependency Situation**

Are there criteria that relate to the size, activity, turnover, economic situation, behaviour, specific investments or other elements related to the company under investigation of relative market power?

**Answer:** N.A.. The concept of relative market power is not recognised in Singapore. However, in the context of the Section 47 Prohibition, the consideration of factors including access to key inputs and distribution outlets, and economies of scale and scope which are relevant to the assessment of potential competition that may constrain the dominant undertaking.

If one of the criteria is alternatives for the undertaking that is dependent on another undertaking with relative market power, how are these alternatives assessed in relation to the dependent undertaking?

**Answer:** N.A.. The concept of relative market power is not recognised in Singapore. In the context of the Section 47 Prohibition, refusing competitors’ access to a key input (including physical assets, proprietary rights or data) or essential facility may potentially constitute an abuse of a dominant position.

Is the cessation or abandonment of the activity considered as a valid alternative and, if so, under what conditions? To what extent are the economic consequences for the undertaking dependent on another undertaking with relative market power taken into account?

**Answer:** N.A.. The concept of relative market power is not recognised in Singapore.

To what extent is a commitment to diversify activities or to work with different counterparties a criterion? To what extent is the behaviour and willingness of the dependent party to reduce the risk of dependency over time a criterion?

**Answer:** N.A.. The concept of relative market power is not recognised in Singapore.

To what extent is the fault of the company in a dependency situation a criterion?

**Answer:** N.A.. The concept of relative market power is not recognised in Singapore.

How are these assessed?

**Answer:** N.A. See above.

**2.5. Criteria related to the Imbalance of the Party’s Position**

Are there criteria to capture the relative position of one of the parties in relationship to the other, or that capture a possible imbalance in the bilateral relationship between the parties?

**Answer:** No. The concept of relative market power is not recognised in Singapore. In the context of the Section 47 Prohibition, there is also no criteria in relation to the relative position of parties.

How are they assessed?

**Answer:** N.A. See above.

**2.6. Other Criteria and Considerations**

Are there specific criteria depending on the industry or business model under investigation?

**Answer:** No. The concept of relative market power is not recognised in Singapore.

Are these criteria applied to current business relationships or also future or potential business relationships?

**Answer:** N.A.. No specific criteria exist.

What kind of economic assessments, studies or industry expert opinions are used to refine the criteria?

**Answer:** N.A.. The concept of relative market power is not recognised in Singapore. In the context of the Section 47 Prohibition, the CCCS identifies the relevant market definition and assesses whether an undertaking is dominant using tools like the Hypothetical Monopolist Test (SSNIP test), assessment of market shares, and barriers to entry. An economic effects-based approach is then applied to evaluate whether the conduct has, or is likely to have an adverse effect on the process of competition.

The CCCS may also rely on industry expert opinions and market studies to understand specific market dynamics and competitive effects. Expert reports, economic modelling, and consultations with stakeholders provide insights into the impact of the conduct on competition.

What discretion does the enforcers have?

**Answer:** N.A.. The concept of relative market power is not recognised in Singapore.

**3. Abuse of Relative Market Power**

Is there a requirement of abusive behaviour (or a similar concept), or is the imbalance of power and dependency sufficient for legal regulatory ?

**Answer:** N.A.. The concept of relative market power is not recognised in Singapore.

An abuse of a dominant position is part of the two-step test in assessing whether there has been an infringement of the Section 47 Prohibition.

If there is a requirement of abusive conduct, is it the same as or different from abuse of a dominant position?

**Answer:** N.A. The concept of relative market power is not recognised in Singapore. Only abuse of dominant position is recognised.

Is a restriction of competition necessary for an abuse to be found and, if so, how is it assessed?

**Answer:** The concept of relative market power is not recognised in Singapore. In the context of the Section 47 Prohibition, exclusionary conduct is the primary conduct that the CCCS will investigate as potentially amounting to an abuse of dominance. As stated above, the CCCS conducts an economic effects-based assessment that will generally be centred on the degree to which the conduct in question forecloses (or has the potential to foreclose) the competitors of the dominant undertaking from being able to compete effectively in the relevant market. At present, there are no types of arrangements or conduct that are considered to constitute abusive conduct on a per se, or restriction by object, basis.

Does the definition of abusive behaviour focus on exploitative or exclusionary behaviour, or both?

**Answer:** Please see the responses above. In the context of the Section 47 Prohibition, the focus of the definition of abusive behaviour is on exclusionary behaviour.

What kind of abusive conduct is most often the focus of intervention?

**Answer:** In the context of the Section 47 Prohibition, exclusionary conduct, particularly conduct that forecloses competitors, whether through horizontal or vertical foreclosure, is most often the focus of intervention.

Are there more findings of exploitative or exclusionary abuse?

**Answer:** In the context of the Section 47 Prohibition, the SISTIC decision related to exclusionary conduct amounting to an abuse of dominance. It is unlikely that exploitation could be considered abusive conduct under Singapore competition laws.

Are there more price or non-price infringements?

**Answer:** In the context of the Section 47 Prohibition, non-price infringements are generally more common, such as exclusive dealing, bundling / tying, full line forcing, and refusal to deal. However, the examples listed above are not exhaustive, and the CCCS would not be restricted from finding an abuse that arises from any other form of exclusionary conduct.

Is such conduct found in existing business relationships or also in future, potential ones (e.g. refusal to deal)?

**Answer:** In the context of the Section 47 Prohibition, such conduct are found in existing business relationships, but may also exist in relation to future, potential relationships. This includes refusal to deal and constructive refusal to deal (where dominant upstream supplier offers to do business on such restrictive terms that it is tantamount to refusing to supply).

What role does voluntary negotiation between the parties play in this context?

**Answer:** N.A..

What remedies are available?

Answer: Where the CCCS has determined that the Section 47 Prohibition has been infringed, it has the ability to issue directions as it considers appropriate to bring the infringement to an end, or to remedy, mitigate or eliminate any adverse effects of the infringement, and to prevent the recurrence of the infringement. These directions can include prohibitory conduct remedies, affirmative conduct remedies, structural remedies or financial penalties, or a combination of these.[[12]](#footnote-12):

1. **Prohibitory conduct remedies**: The CCCS can restrict or prohibit certain behaviours by the relevant undertaking that have been found to be in infringement of the Section 47 Prohibtition. For example, the CCCS may order the relevant undertaking to cease engaging in the abusive conduct.

2. **Affirmative conduct remedies**: The CCCS can require the relevant undertaking to take specific positive actions to restore competition in the relevant markets. These may include granting access to essential facilities or key inputs, modifying contractual terms, or offering fair and non-discriminatory terms to competitors.

3. **Structural remedies**: In more severe cases, the CCCS may impose structural remedies, which involve changes to the ownership or structure of the dominant firm. This could include requiring the firm to divest certain assets or business units to reduce its market power.

4. **Financial penalties**: The CCCS may impose financial penalties on the dominant firm for engaging in abusive conduct. The penalty can be up to 10 per cent. of the turnover of the business of an undertaking in Singapore for each year of infringement, with a maximum penalty period of three years.

5. **Commitment decisions**: In some cases, the CCCS may accept commitments from the relevant undertaking to address the competition concerns without making a formal finding of infringement. These commitments are legally binding and may include a combination of prohibitory, affirmative, or structural measures.

6. **Right of private action**: In addition to the remedies imposed by the CCCS, parties who have suffered loss or damage as a result of an abuse of dominance may pursue private actions in civil courts. However, private actions can only be pursued after the CCCS has made a final determination of infringement and all appeals have been exhausted.

What discretion do enforcers and judges have to reshape the commercial relationship between the parties (e.g. to modify the terms of the contract in favour of one of the parties, to add contractual provisions to the contract)?

**Answer:** Upon finding an abuse of dominance under the Section 47 Prohibition, the CCCS can direct the infringing dominant undertaking to modify the infringing agreements e.g., to remove exclusivity clauses. In addition, the CCCS can direct the infringing dominant undertaking to remove infringing clauses from the contract templates, to prevent future abuses of dominance. [[13]](#footnote-13)

Are there instances where mandatory contract law provisions have been introduced under *ex ante* regulation to deal with relative market power and economic dependence?

**Answer:** N.A.. Relative market power and economic dependence are not recognised concepts in Singapore.

Are abuses of relative market power punishable by fines?

**Answer:** N.A. Abuse of relative market power is not recognised in Singapore. As for the Section 47 Prohibition, as explained above, the CCCS may impose financial penalties on the dominant firm for engaging in abusive conduct. The penalty can be up to 10% of the firm’s turnover in Singapore for each year of infringement, with a maximum penalty period of three years.

Are there differences between remedies ordered by courts and other administrative bodies (eg competition authorities)?

**Answer:** The CCCS focuses on corrective measures to restore market competition (including prohibitory conduct remedies, affirmative conduct remedies, and structural remedies) and imposing penalties on infringing parties, while third parties adversely affected by an infringement of any of the prohibitions under the Competition Act may take action in the courts to seek relief. Additionally, the CCCS may register the direction as a court order to enforce the direction if a person fails to comply with it without reasonable excuse. Breach of such an order would be punishable as a contempt of court.

**4. General Assessment and Conclusion**

You are invited to draw conclusions on the main findings in your jurisdiction and to recommend improvements to the competition rules in your jurisdiction.

Should market criteria (eg market shares) be taken into account in the application of provisions on relative market power?

Are relative market power provisions necessary for competition to function?

**Answer:** While the concept of relative market power is not recognised in Singapore, the existing Competition laws that currently exist in Singapore are sufficiently robust and flexible to address abusive conduct where there is an imbalance in the relationship between an undertaking and a counterparty. In particular, exclusionary conduct by a dominant undertaking which forecloses (or has the potential to foreclose) the competitors of the dominant undertaking from being able to compete effectively in the relevant market would be prohibited.

Are they generally justified as part of the competition rules?

**Answer:** Please see above.

Are they justified in certain sectors?

**Answer:** Please see above. While the Section 47 Prohibition does not apply to various sectors including postal services, wastewater management and transport services, the existing Competition laws that currently exist in Singapore are sufficiently robust and flexible to address abusive conduct where there is an imbalance in the relationship between an undertaking and a counterparty.

Are the current rules predictable for companies?

**Answer:** Yes, Singapore's competition law provides clear guidelines on abuse of dominance. The CCCS also publishes detailed infringement decisions, enhancing transparency regarding enforcement standards and reasoning.

1. The CCCS Guidelines on the Section 47 Prohibition at [3.1] [↑](#footnote-ref-1)
2. *Singapore Parliamentary Debates, Official Report* (19 October 2004) vol 78 at col 863 (Dr Vivian Balakrishnan, Senior Minister of State for Trade and Industry). [↑](#footnote-ref-2)
3. Ibidat col 864. [↑](#footnote-ref-3)
4. Ibidat col 865. [↑](#footnote-ref-4)
5. IMDA - Advisory Guidelines on Market Definition & Assessment of Market Power at p.1, read together with paragraphs 6.4 and 10.6.5 of the Code. [↑](#footnote-ref-5)
6. Section 86 of the Competition Act and CCCS Guidelines on the Major Provisions at [14.6]. [↑](#footnote-ref-6)
7. Section 47 Guidelines at [↑](#footnote-ref-7)
8. Section 47 Guidelines at [3.4] [↑](#footnote-ref-8)
9. Section 47 Guidelines at [3.5] [↑](#footnote-ref-9)
10. Section 47 Guidelines at [3.9] [↑](#footnote-ref-10)
11. SISTIC decision at A5.3 [↑](#footnote-ref-11)
12. Section 47 Guidelines at 8.2 [↑](#footnote-ref-12)
13. SISTIC Decision at Chapter 10 [↑](#footnote-ref-13)