September–October 2019

German Competition Law Newsletter

Highlights

— Competition Law 4.0: German Expert Commission Presents Competition Policy Recommendations For Digital Economy

Competition Law 4.0: German Expert Commission Presents Competition Policy Recommendations For Digital Economy

On September 9, 2019, the Commission 'Competition Law 4.0' ("Commission 4.0"), a group of German experts on competition law in the digital economy, appointed by the Federal Minister for Economic Affairs and Energy, Peter Altmaier, presented its competition policy recommendations for the digital economy.[1] The Commission 4.0's mandate was to draw up policy recommendations for the further development of European competition law in light of the new challenges posed by the digital economy, in particular the new data economy, the rise of platform-based business models, and growing importance of cross-market digital ecosystems.

Background

Given the prominence and size of large companies in the digital economy, in particular "GAFA" (acronym for Google, Apple, Facebook, and Amazon), their conduct has been the focus of both European and German investigations, administrative proceedings, and court decisions in recent years. For instance, the European Commission accused Google of self-preferencing its own services over those of third parties[2] and opened an investigation into Amazon's use of third-party sellers' data.[3] The Federal Cartel Office ("FCO") issued a decision against Facebook regarding the company's data collection practices.[4] Consequently, the adaptation of antitrust laws to the digital economy has also become a matter of significant political concern. The EU, the UK and Australia have already commissioned similar reports.[5]

[1] The Commission 4.0's Report is available in English here; a summary is available in English here.

[2] *Google Shopping* (Case COMP/AT.39740), Commission decision of June 27, 2017, available in English here, Google's appeal is pending.

[3] European Commission Press Release (Case COMP/AT.40462), July 17, 2019, available in English here.

[4] See German Competition Law Newsletter January – February 2019, p. 1 *et seq.*, available here. Facebook's appeal is pending. In an interim decision, however, the Düsseldorf Court of Appeal ("DCA") has already expressed serious doubts as to the legal validity of this decision, see also our article in the German Competition Law Newsletter July – August 2019, p. 1 *et seq.*, available here.

[5] The UK's Report, March 2019, is available in English here. The Australian Report, June 2019, is available in English here. The European Union's Report, May 5, 2019, is available in English here.

Against this backdrop, the Commission 4.0's overall mandate was to develop a framework whereby, on the one hand, internationally competitive European digital companies can continue to exist or emerge and, on the other hand, the functioning of competitive market structures in the digital economy is ensured.

The Commission 4.0's Recommendations

Competition drives innovation and guarantees consumer choice. The Commission 4.0 therefore deems it necessary to adapt the current regulatory framework, in particular so that positions of market power in the digital economy can be contested, including by taking into account strong concentration trends.

The Commission 4.0's final report contains 22 concrete recommendations to improve consumer access to their own data, to introduce clear rules of conduct for dominant platforms, to improve legal certainty for cooperation in the digital sector, and to strengthen the interplay between competition law and other forms of digital regulation. The main issues are the following:

Market Definition And Assessment Of Market Power

The digital economy's challenges and new conditions lead to structural changes in competitive relations, in particular with regard to competitive discipline and market access. The Commission 4.0 proposes a comprehensive reevaluation of current European competition law rules, in particular the European Commission's Notice on the definition of the relevant market.[6] As the notice dates from 1997, the Commission 4.0 considers its approach insufficient to deal with new challenges, *e.g.*, multi-sided platforms and markets where services are offered free of charge. The Commission 4.0 also proposes adopting a complementary and more specific notice on digital platforms, which should provide guidance on market definition and on the particularities of finding a dominant position in digital markets.

Access To Data

Information—about (potential) customers, business partners, and product and market developments—are pivotal competitive parameters in the digital economy and can gain importance and value far beyond their original market context. A company's greater access to data may result in competitive advantages, which may, in turn, improve and extend the company's access to further data and a competitive advantage on several markets. The Commission 4.0 is considering measures that may help to control such "new" conglomerate effects. As a means to (re)create competitive pressure on such integrated digital ecosystems and to contest their power positions, the Commission 4.0 considers it necessary to safeguard access to data. The Commission 4.0 therefore advocates a strict application of the given competition law rules.

In addition, the Commission 4.0 considers strengthening consumer sovereignty an important tool to facilitate access to consumer data and avoid the emergence of competition concerns. The more easily consumers are able to port their data from one provider to another, or allow new providers access to data, the more likely it is that competitors will be able to challenge data-based market power. The Commission 4.0 therefore proposes vigorously enforcing the obligation laid down in data protection law to guarantee data portability *vis-à-vis* dominant platforms.

Moreover, according to the Commission 4.0, supplementary sectoral regulation could also provide for consumers' rights to grant third-party providers access to their user accounts, along the lines of the Second Payment Services Directive[7], which aims to open markets and reduce lock-in effects.

Finally, the Commission 4.0 recommends researching the options available for establishing data trustees to act as intermediaries between the collectors/users of data, *i.e.*, companies, and allegedly overburdened consumers.

[6] Commission Notice on the definition of relevant market for the purposes of Community competition law, OJ C 372, 9.12.1997, p. 5-13.

[7] Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market, amending Directives 2002/65/EC, 2009/110/EC and 2013/36/EU and Regulation (EU) No 1093/2010, and repealing Directive 2007/64/EC (Text with EEA relevance), OJ L 337, 23.12.2015, p. 35–127.

New Rules Of Conduct For Digital Platforms

The Commission 4.0 considers that increasing market concentration poses particular threats to effective competition on platform markets. Such increased market contraction can result from strong positive network effects and the role of digital platforms as gatekeepers, enabling platforms to control competition on the platforms themselves as well as on adjacent markets.

Once a digital platform has obtained a dominant position, challenging its position becomes increasingly difficult, especially due to positive network effects. Such platforms maintain a huge influence on their users. In addition to the fast-paced developments and significant first-mover advantages, the implications and possible cost due to delayed intervention or complete failure to hinder anticompetitive practices are particularly significant. Therefore, a majority of the Commission 4.0's members recommends the adoption of an EU sectoral regulation for platforms ("Platform Regulation") to impose a specific code of conduct on dominant platforms, *i.e.*, online platforms meeting certain minimum turnover or user-number thresholds.

In the Commission 4.0's view, such sectoral regulation should include, *inter alia*, (i) a prohibition of self-preferencing relative to third parties, (ii) an obligation to allow portability of user and usage data both in real time and in an interoperable data format, and (iii) an obligation to set up an alternative dispute resolution procedure for infringements on the platform.

Legal Certainty For Cooperation

The Commission 4.0 recognizes that innovation is key to successful participation in the digital market. In order to take advantage of the opportunities offered by technological and market changes, companies must be able to experiment with the new possibilities offered by data and platform economics, including in the field of data sharing. Cooperation in various forms can be part of this search and innovation process. However, such novel forms of cooperation may give rise to competition concerns. In order to address any new legal issues that may arise in this context, the Commission 4.0 recommends the introduction of a voluntary notification procedure with a short deadline and corresponding reinforcement of the European Commission's resources.

Merger Control

The Commission 4.0 highlights the concern that large digital companies frequently acquire start-ups in order to eliminate potential competitors at a very early stage. Such "killer acquisitions" are aimed at expanding the power position of established large digital ecosystems, protecting them from attacks, and at the same time preventing innovation efforts in their environment. The Commission 4.0 does not consider that key elements of the present merger control regime, such as turnover thresholds and the principle of *ex-ante* control, should be reformed at this point. However, the Commission 4.0 recommends developing guidelines for the acquisition of start-ups by digital market players, paying particular attention to data-based, innovation-based and conglomerate theories of harm.

Strengthening Enforcement Of Competition Law

In view of the rapid pace of economic and social change brought about by digitization, the Commission 4.0 stresses the importance of competition authorities being able to intervene quickly and effectively when the market behavior of a dominant undertaking leads to anticompetitive impediments or foreclosure effects. To this end, the Commission 4.0 urges competition authorities to adopt a more proactive approach with respect to interim measures in order to prevent irreversible damage to competition.

In addition, the Commission 4.0 recommends a more flexible and targeted use of measures that not only put an end to an infringement but also prevent its recurrence and restore effective competition. In particular, the Commission 4.0 proposes to introduce so-called "restorative measures", such as an obligation for a dominant undertaking to ensure technical interoperability by disclosing interface information, or to grant access to data. The Commission 4.0 also believes

that a study should be carried out in order to analyze measures and remedies that have previously been applied by competition authorities in pertinent cases (Microsoft, Google Shopping, *etc.*).

Establishment Of A New Digital Markets Board

The Commission 4.0 also emphasizes the need for a coherent and overarching European digital policy across the different areas of law, in particular competition, consumer protection, and data protection. To this end, the Commission 4.0 recommends, *inter alia*, the establishment of a new Digital Markets Board within the General Secretariat of the European Commission responsible for coordinating the different forms of digital regulation.

A majority of the Commission 4.0's members recommends establishing a temporary Digital Markets Transformation Agency at EU level. The agency would collect market development information and process technical developments as well as coordinate with a corresponding network of Member State institutions and support the Member States' regulatory and competition authorities as well as policymaking institutions.

Outlook

The further discussion and possible implementation of the Commission 4.0's recommendations will certainly take some time, not least the adoption of guidelines and regulations, but also the establishment of a new Digital Markets Board. However, the report provides concrete legislative proposals, particularly with an eye towards Germany's upcoming Council Presidency in the second half of 2020. In addition, the work of the Commission 4.0 will undoubtedly have a significant impact on current legislative developments in Germany, in particular the forthcoming 10th amendment of the ARC, which, among other things, also focuses on data access and the ban on certain forms of self-preferencing by dominant market platforms. The official publication of the draft legislative proposal was originally expected for mid-December 2019, but has not yet occurred at the time of publication of this newsletter and will thus only occur in (early) 2020.

News

FCO

FCO Clears Rewe Group's Lekkerland Acquisition, While Austrian Authority Blocks Austrian Part Of The Deal

On October 9, 2019, the FCO unconditionally cleared Rewe-Zentralfinanz eG's ("Rewe") acquisition of wholesaler Lekkerland AG & Co. KG ("Lekkerland").[8] Rewe is mainly active as a food retailer, but also as a food wholesaler, supplying fresh and convenience food to Aral AG's gas station shops. Lekkerland is a German wholesaler for food and tobacco products whose principal clients are gas station shops, convenience stores and kiosks.

The concentration was originally notified to the European Commission. The European Commission referred the German and Austrian aspects of the case to the FCO and the Austrian Federal Competition Authority ("FCA") in July 2019 and cleared the remaining aspects of the case in August 2019.[9] The FCO already initiated its comprehensive investigation immediately after the referral decision. This enabled the FCO to clear the case in Phase I in October 2019, even though the parties had only formally notified the transaction in September 2019, triggering the formal review period.

The FCO found that the parties' combined share in an overall wholesale market for food would be small, but in a possible segment for the wholesale of food to gas station shops and convenience stores above 40%. However, the FCO concluded that the countervailing bargaining power of gas station chains, the substitutability of the parties'

[8] FCO Press Release, October 9, 2019, available in English here. The FCO's case report of October 9, 2019 is only available in German here.

[9] *Rewe/Lekkerland* (Case COMP/M.9142), Commission decision of August 7, 2019, available in English here.

product portfolio with offers from specialized wholesalers, competition by cash-and-carry wholesalers and potential new market entrants will constrain the combined entity post-merger. While manufacturers voiced concerns regarding the merged entity's increased purchasing power, the FCO considered, first, that the addition of Lekkerlands's wholesale activities would not have a significant impact on Rewe's bargaining power and, second, the combined entity would not be able to influence the gas stations' product portfolio since most branded products are indispensable for convenience stores and there would thus be no credible threat of delisting.

In addition, the FCO found that the transaction would have no significant impediment to effective competition in the German wholesale market for tobacco in spite of Lekkerland's market share exceeding 50%, concluding that Rewe's activities in this segment were only ancillary to its food wholesale activities.

In Austria, the FCA's concerns regarding anticompetitive effects on the supply to gas station shops were resolved by Rewe committing to carve out Lekkerland's Austrian subsidiary from the entire transaction.[10]

FCO Revokes Antitrust Exemption For Dry Building Materials Cartel

On September 20, 2019, the FCO prohibited SAKRET Trockenbaustoffe Europa GmbH & Co. KG ("SAKRET Europe") from continuing to undertake distribution activities for its shareholders and sublicensees of the SAKRET brand regarding the sale of dry building materials.[11] In doing so, the FCO revoked an exemption it had granted back in 1982.

The SAKRET brand is owned by a U.S. company, which has licensed the use of the SAKRET brand name and dry mortar formula to independent manufacturers of building materials worldwide. SAKRET Europe, the licensee for Germany and Europe, has issued sublicenses to its shareholders and other construction companies. In addition, SAKRET Europe has centrally organized the distribution activities of its German sublicensees by negotiating prices with do-it-yourself stores. It has also negotiated framework conditions with specialized building materials traders.

In 1982, the FCO had recognized SAKRET Europe and its distribution activities for its shareholders and sub-licensees as a cartel of small and medium-sized enterprises, an exemption expressly provided for under German competition law. The exemption presupposes, *inter alia*, that the market share of all cartelists does not exceed 10-15%. Since 1990, however, Gebr. Knauf KG ("Knauf"), one of the world's largest drywall and insulation manufacturers, acquired several of the medium-size companies that were part of SAKRET Europe's network. This resulted in the network, including Knauf, exceeding the market share threshold. Accordingly, the FCO found that SAKRET Europe's distribution activities, which harmonized the market behavior of its sublicensees and therefore led to a noticeable restriction of competition, could no longer benefit from the exemption.

Interestingly, the FCO suggested during the proceedings that SAKRET Europe could have continued its distribution activities in accordance with German antitrust law without Knauf's participation. However, this proposal failed due to the lack of approval by SAKRET Europe's shareholders.

FCO Prevents Alliance Of Purchasing Organizations For Furniture

On September 12, 2019, the FCO closed administrative proceedings against two joint purchasing organizations for furniture, VME Union GmbH and KHG GmbH & Co. KG, after the organizations had abandoned their plans to enter into an alliance.[12]

Under EU and German antitrust law, there is no absolute threshold above which it can be presumed that the parties to a joint purchasing arrangement have market power so that the joint purchasing

[10] FCA Press Release, October 21, 2019, available in English here.

[11] FCO Press Release, September 20, 2019, available in English here.

[12] FCO Press Release, September 12, 2019, available in English here.

arrangement is likely to give rise to restrictive effects on competition. However, in the European Commission's and FCO's view, in most cases it is deemed unlikely that market power exists if the parties to the joint purchasing arrangement have a combined market share not exceeding 15% on the purchasing market(s) and on the selling market(s).

During its investigation, the FCO found that the two joint purchasing organizations would have likely enjoyed combined market shares in excess of 15% on both markets. It further considered that, since the affiliated furniture stores handle the majority of their purchases through their respective joint purchasing organizations, such an alliance would have led to a high degree of commonality of costs and therefore to restrictions in price and assortment competition.

Courts

FCJ Partially Quashes Judgement On Adblock Plus

On October 8, 2019, the German Federal Court of Justice ("FCJ") partially quashed a 2017 decision of the Munich Court of Appeal,[13] finding that ad-blocking software provider eyeo GmbH ("Eyeo") may have abused a dominant position.[14] The FCJ referred the case back to the Court of Appeal.

Eyeo's free browser plugin "Adblock Plus" determines, based on filter lists, the online advertisements that are blocked ("blacklist"), and the advertisements that are displayed to internet users ("whitelist"). A website can be included in Eyeo's default whitelist if its publisher signs a whitelisting agreement, accepting the obligation to only show unobtrusive ads. Large entities are only whitelisted for a fee, while other entities are generally whitelisted for free, if they meet Eyeo's whitelisting criteria.

In 2017, the Munich Court of Appeal had rejected online publisher RTL interactive GmbH's ("RTL Interactive") application for a cease and desist order against Eyeo. In the Munich Court of Appeal's view, Eyeo did not hold a dominant position in the market for access to Internet users in Germany, as only 20% of all Internet users in Germany used Eyeo's ad-blocker.

On appeal, the FCJ found that the Munich Court of Appeal's definition of the relevant market was flawed. The FCJ considered that the relevant market should be the market for access to Internet users who have installed Adblock Plus, rather than the market for access to all Internet users, and—based on a lack of sufficient factual findings by the lower courts—referred the case back to the Munich Court of Appeal. When assessing whether Eyeo holds a dominant position in this narrower market, according to the FCJ, the Munich Court of Appeal must consider whether online publishers have any other economically viable means of accessing users who have installed the ad-blocker than entering into a whitelisting agreement (*e.g.*, by using software that bypasses the ad-blocker or by blocking users who use the ad-blocker from accessing their website). In order to assess whether Eyeo abused a dominant position, the Munich Court of Appeal has to weigh the interest of operators of advertising-financed websites in distributing advertisements (thus enabling them to make the websites available to users free of charge) against Eyeo's interest in helping the users pursue their legitimate interest of blocking such advertisements. It remains to be seen how the Munich Court of Appeal will decide this time, taking the requirements identified by the FCJ into account.

Nomination Of Supervisory Board Member Not Gun Jumping

On August 26, 2019, the DCA dismissed a claim based on allegations of gun jumping against the appointment of a new member of Ceconomy AG's ("Ceconomy") supervisory board.[15]

The new nominee for a vacant supervisory board seat had to be appointed by the competent local court because the shareholders of Ceconomy,

[13] Munich Court of Appeal decision (U 2184/15 Kart) of August 17, 2017, only available in German here. On the Munich Court of Appeal's decision, see also our article in the National Competition Report Q3 2017, p. 9 *et seq.*, available here.

[14] *Werbeblocker III* (KZR 73/17), FCJ decision of October 8, 2019, only available in German here.

[15] *Aufsichtsratsbestellung* (VI-W (Kart) 5/19), DCA decision of August 26, 2019, an extract has been published in *Neue Zeitschrift für Kartellrecht* (NZKart 2019, 562). The full decision has yet to be published.

which itself holds a majority stake in the Media-Saturn-Holding GmbH ("Media-Saturn"), could not agree on one. The local court appointed the CEO of Ceconomy's third-largest shareholder, Freenet AG ("Freenet"), holding a 9.15% stake. Convergenta Invest GmbH ("Convergenta"), which is not a shareholder of Ceconomy itself but is Ceconomy's joint venture partner in Media-Saturn, appealed the appointment. Convergenta submitted that the nomination conferred Freenet a "competitively significant influence" and therefore constituted a notifiable concentration under German merger control law. Since it had not been notified, Convergenta argued that the nomination amounted to an infringement of the standstill obligation and should therefore be considered invalid.

The acquisition of a competitively significant influence requires that—in addition to a minority shareholding of below 25%—there are "additional factors" that give the acquirer the possibility to influence the target and thus make the situation comparable to an acquisition of 25%. According to German case law, such additional factors, can be, *e.g.*, the right to appoint (supervisory) board members, information rights, *de facto* influence in shareholder meetings, or the acquirer's superior knowledge of the market. However, the DCA found that none of the requisite "additional factors" for the assumption of a competitively significant influence were given in the present case. To the contrary, it stressed that (i) there were two shareholders with much larger stakes (22.71% and 14.33%, respectively), (ii) Freenet could not block decisions at general meetings, and (iii) Freenet's CEO was only one of 20 supervisory board members. In light of Ceconomy's diversified portfolio, the DCA also noted that it was irrelevant that Freenet was an important partner for Ceconomy as regards the sale of mobile phone contracts.

Other Developments

New Guidelines On The Control Of Abusive Behavior In The Electricity Generation And Wholesale Trade Sector

On September 27, 2019, the FCO and the Federal Network Agency ("FNA") jointly published guidelines on the control of the abuse of a dominant position in relation to electricity generation and wholesale trade ("Guidelines").[16]

The Guidelines describe the application and scope of competition law rules on the abuse of a dominant position in relation to electricity generation and wholesale trade. In particular, the Guidelines provide guidance on legitimate price peaks on the electricity wholesale market, *i.e.*, price increases resulting from a fair balancing of supply and demand, as opposed to price increases due to scarcity that results from deliberate reductions of capacity by dominant electricity providers:[17]

— To assess market dominance, the Guidelines refer to the Residual Supply Index ("RSI"), which is also used by the European Commission to quantify whether, and to what extent, an electricity provider is indispensable to meet demand.[18] The Guidelines consider an electricity provider dominant if the provider is deemed indispensable for meeting electricity demand in at least 5% of the hours of a year.[19]

— The Guidelines consider deliberate shortages of energy supply abusive, including (i) physical capacity restraints, *i.e.*, situations in which a provider does not offer available capacity that could be sold at a price above the short-term marginal costs, and (ii) financial capacity restraints, *i.e.*, situations in which a provider offers capacity only at such a high price that it is not used to meet supply and demand.

[16] FCO/FNA, Guidelines on the control of abusive practices in electricity generation/wholesale trade, September 27, 2019, only available in German here.

[17] In addition to the application of competition law, the Guidelines provide guidance for interpreting the "Regulation on the Integrity and Transparency of the Wholesale Energy Market" ("REMIT") which applies to all providers (*i.e.*, including non-dominant providers) and aims at preventing market manipulations by, *e.g.*, spreading of false or misleading information regarding the availability of capacity using urgent market messages.

[18] The FCO already suggested the use of the RSI in its Sector Inquiry into Electricity Generation and Wholesale Markets of January 11, 2011, available in English here.

[19] However, in the 7th Sector Report on Energy Markets (see more in this issue's next article), the Monopolies Commission recommended applying the 5% threshold to each price peak, arguing that the period of a whole year would create uncertainties as a price peak during the year may only become illegal when the undertaking has reached the 5% threshold at the end of that year. Although the FCO maintained the 5% of the hours of a year, it clarified that it would also consider periods of less than a year.

— The Guidelines only provide few non-exhaustive examples of potential justifications for capacity restraints , *e.g.*, if a provider can only recover its full cost when withholding certain capacities.

Monopolies Commission Publishes 7th Sector Report On Energy

On September 18, 2019, the Monopolies Commission published its biennial sector report on the development of competition in the German electricity and gas markets.[20] The report identifies three main areas of competition concerns: (i) monopolistic tendencies in connection with the expansion of e-mobility, (ii) insufficient competition for onshore wind energy tenders, and (iii) potential abusive pricing practices in electricity wholesale trading:

— The Monopolies Commission fears that individual operators of electric vehicle charging points may become regional monopolies and subsequently charge excessive prices. Local authorities should seek to ensure that a number of different operators receive authorization for the construction of charging points networks. Moreover, the Monopolies Commission urges the FCO and the state competition authorities to take action in areas where operators hold a dominant position.

— The Monopolies Commission identified challenges in the tender process for onshore wind energy tenders stemming from low participation in the tenders and a lack of open space and permits for wind turbines. The Monopolies Commission recommends that open space and permits should be made available as soon as possible. If this is not possible, the tender quantity should be adjusted to the limited availability of open space.

— For the electricity wholesale sector, the Monopolies Commission fears that the future shortage of generating capacity caused by the transition away from nuclear power and coal will allow producers to influence the electricity price by deliberately withholding capacity. The Monopolies Commission recommends applying the abuse of dominance rules to any such conduct and therefore generally welcomes the FCO's and FNA's draft guidelines on the application of those rules to the sector.[21] However, it warns that numerous uncertainties remain regarding the applicable standards (in particular temporal market definitions), the handling of "technical" failures, and the possibility of using funding shortfalls to justify capacity restraints.

[20] Monopolies Commission, 7th Sector Report on Energy Markets, September 18, 2019, only available in German here. A press release is available in English here.

[21] The final version of the Guidelines is also discussed together with the Monopolies Commission's recommendations in more detail in this issue's previous article.

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