May 2018

UK Competition Law Newsletter

Highlights

— Supreme Court allows CMA appeal in *R (Gallagher) v CMA*

— Parliamentary report calls for competition review of statutory audit market

— CMA recommends divestiture of Sky News in *Fox/Sky* report

Is Politics Set to Play a Greater Role in UK Merger Enforcement?

Application of UK merger control rules has for the past 30 years been insulated from political influence. Under the Fair Trading Act 1973, UK mergers were considered under a broad public interest test. The Office of Fair Trading and the Monopolies & Mergers Commission (the predecessor to the Competition Commission) were required to take into account "*all matters which appear to them in the particular circumstances to be relevant*."[1]

UK enforcement has in practice focused on competition concerns since the mid-1980s, when the then-Secretary of State for Trade and Industry, Norman Tebbit, announced that "*references to the Monopolies & Mergers Commission would be made primarily, but not exclusively, on competition grounds.*"[2] The emphasis on competition criteria alone was reflected in the Enterprise Act 2002, which established a "*regime that is more focused on competition*"[3] through an institutional structure that removed Ministers from decision-making on the ground that "*the economy is best served if mergers are assessed solely on the basis of their effect on competition*" with decisions taken by "*expert competition authorities operating independently of Ministers.*"[4]

The Secretary of State did, however, retain the power to intervene in mergers in certain narrowly-defined circumstances:

— **Public interest cases.** The Secretary of State can issue a Public Interest Intervention Notice ("**PIIN**") in mergers that meet the UK jurisdiction thresholds and raise public interest considerations concerning national security, plurality of the media, or the stability of the UK financial system.[5]

[1] Fair Trading Act 1973, s.84.
[2] Quoted in *First report: Takeovers and mergers*, 27 November 1991 HC 90 1991-92 para 233
[3] Department for Trade & Industry, *The Enterprise Act: Competition Reform – Regulatory Impact Assessment*, 2002, page 10.
[4] Lord Sainsbury of Turville, House of Lords Committee on the Enterprise Bill, Hansard, HL Vol.637, col.1465 (July 18, 2002).
[5] Under the Enterprise Act, the Government is entitled to enact secondary legislation in order to create new public interest grounds for intervention in mergers. The only time this was done was in October 2008, when the Government added the interest of maintaining financial stability to the list of public interest concerns, allowing the Secretary of State to intervene in the takeover of HBOS (a mortgage lender) by Lloyds TSB.

— **Special public interests cases.** When a merger does not meet the jurisdictional thresholds, the Secretary of State may still intervene by issuing a special public interest intervention notice ("**SPINN**") for mergers: (i) involving certain Government contractors holding confidential defence-related information; and (ii) in the newspaper and broadcasting sectors.

— **EU Mergers.** Certain mergers that fall within the scope of the EU Merger Regulation can also be reviewed on public interest grounds at a national level. Under the EU Merger Regulation, Member States may take "*appropriate measures*" to protect public security, plurality of the media, and prudential rules. Any other public interests must be approved by the European Commission on a case-by-case basis.[6]

The Secretary of State's powers have been used sparingly and successive Governments have intervened in only a handful of cases, largely to take account of defence, media plurality, and prudential considerations.[7]

Growing political interest in UK merger control

The past decade has seen growing calls for UK merger review to take account of public interest considerations and for the Government to be empowered to intervene on public interest grounds.

— **Kraft/Cadbury.** In 2010, the hostile takeover of Cadbury by Kraft Foods provoked a debate about the need for a new public interest test after Kraft reneged on a commitment to keep Cadbury's Somerdale factory open. Although the creation of a new public interest test was resisted, the Government encouraged a review of the Takeover Code aimed at "*strengthen*[ing] *the position of target companies in the face of unwelcome takeovers*,"[8] which led to several target-friendly amendments, including the introduction of the 28-day "*put up or shut up*" regime.

— **Pfizer/AstraZeneca.** Political calls for a new public interest test re-emerged following the 2014 announcement of a possible offer by Pfizer (a US company) for UK-based AstraZeneca. There were concerns that AstraZeneca's R&D activities in the UK would be harmed. In a public letter to the Prime Minister, the leader of the Opposition at the time, Ed Miliband, wrote that "*there should be a stronger public interest test which encompasses cases such as these where strategic elements of our science base, with impacts well beyond the firm concerned, are involved*."[9] Although Pfizer withdrew its possible offer having failed to secure support from the board of AstraZeneca, the Secretary of State at the time, Vince Cable, noted that "*What emerged as a result of the recent high-profile case of AstraZeneca and Pfizer was a lack of clarity around the enforcement of assurances*."[10] This concern led to the introduction into the Takeover Code of a regime of voluntary, enforceable post-offer undertakings aimed at holding companies accountable for their commitments.

— **Kraft/Unilever.** In 2017, Kraft Heinz was considering a bid for Anglo-Dutch Unilever. News reports suggested that Prime Minister Theresa May had ordered officials to review whether the transaction raised concerns for the wider British economy and required Government intervention.[11] Although Kraft did not go on to announce a formal offer, the possible bid highlighted the Government's limited powers to intervene in transactions. Asked

[6] EU Merger Regulation, art. 21 (4).

[7] Recent cases in which media plurality issues have been considered include 21st Century Fox's proposed acquisition of Sky plc, which was referred to the CMA; *Comcast/Sky*, in which the Secretary of State considered whether to intervene in the European Commission's merger review but indicated in May that he was minded not to intervene (Comcast also gave enforceable post-offer undertakings under the Takeover Code); and *Trinity Mirror/Northern & Shell*, where the Secretary of State issued a PIIN on grounds of media plurality and the need for free expression of opinion in newspapers.

[8] BIS, Implementation of the Kay Review: Progress Report, 27 October 2014 para 2.110.

[9] Reuters: "UK's Labour calls for inquiry into Pfizer's AstraZeneca bid", May 4, 2014, available at: www.reuters.com/article/us-astrazeneca-pfizer-politics-idUSBREA4301S20140504. Pfizer publicly announced various commitments in relation to AstraZeneca, including to base its EU business and regulatory headquarters in the UK and to continued investments in UK-based R&D activities, for a minimum period of five years.

[10] Vince Cable, Commons Debates, Daily Hansard, col. 910 (July 16, 2014).

[11] Reuters, "UK PM May orders officials to examine Kraft Heinz Bid for Unilever: FT", February 19, 2017, available at: /www.reuters.com/article/us-unilever-m-a-kraft-may-idUSKBN15Y0PT.

whether the Prime Minister was still committed to reviewing the Government's powers, a Number 10 spokesman indicated that "*the prime minister has said the government should be 'stepping up, not stepping back' where questions of national interest arise*."[12]

— **Melrose/GKN.** In March 2018, in an open letter to Melrose concerning its proposed acquisition of GKN, the British automotive and aerospace components manufacturer, the Secretary of State for Business, Energy and Industrial Strategy ("**BEIS**") reiterated his powers under the Enterprise Act and added that "*In addition to this statutory role,* [he had] *a wider concern that, where important businesses are involved, takeovers should not act against the interests of our economy, employees or the broader set of stakeholders*."[13] The letter requested wide-ranging undertakings concerning the future operation of GKN in the UK that were offered by Melrose the following day.[14] The Secretary of State noted that this was the first "*contested bid in which the new regime of legally binding commitments on future conduct ha*[d] *applied*."[15] These undertakings were in addition to commitments agreed with the Ministry of Defence following its review of the transaction from a national security perspective. The Secretary of State informed Parliament that on the basis of this package of undertakings, there were no grounds to make a statutory intervention on the grounds of national security.

Are statutory reforms moving in the same direction?

In 2016, Prime Minister Theresa May called for "*a proper industrial strategy to get the whole economy firing*,"[16] and, referring to Pfizer's attempt to acquire AstraZeneca, a company she called "*one of the jewels in* [Britain's] *crown*," she suggested the Government should be able to "*step in*" to defend sectors of importance to the UK economy. Since then, there have been statutory reforms (and proposals for reform) that together suggest a growing role of Government in merger control:

— In May 2018, the Government published orders amending the merger thresholds for firms that develop or produce items for military use, computer hardware, or quantum technology, which entered into force on June 11, 2018.[17] In particular, the Government is concerned about the ownership of companies developing technologies that could be put to military or hostile use. The CMA will be able to intervene in these mergers where the target's UK turnover exceeds £1 million or the target has a UK share of supply of at least 25% (even where the share will not be affected by the merger).

— Alongside these new thresholds, the Government is considering options for longer term reform, which would allow even greater scope for intervention in transactions by foreign buyers or on national security grounds. One option is the extension of the UK's voluntary merger regime to expand the CMA's "*call in*" powers, under which, the Government would be able to intervene in the "*acquisition of significant influence or control over any UK business entity by any investor (either domestic or foreign)*" in any sector, and in "*any other transaction that gives (directly or indirectly) significant influence or control over that company or over its assets or businesses in the UK*." Another, potentially less expansive suggestion, is the introduction of a mandatory notification regime for foreign investment in "*essential functions*," including the civil nuclear, communications, defence, energy, and transport industries.

[12] Financial Times, "Kraft case shows limits to UK's power to intervene", February 19, 2017, available at: www.ft.com/content/e24ca166-f694-11e6-bd4e-68d53499ed71?ftcamp=published_links%2Frss%2Fhome_us%2Ffeed%2F%2Fproduct.

[13] Letter from the Secretary of State for Business, Energy & Industrial Strategy to Melrose Industries PLC, March 26 available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/694572/Letter_from_Business_Secretary_to_Melrose_Industries_Plc.pdf

[14] Response letter from Melrose Industries PLC, to the Secretary of State for Business, Energy & Industrial Strategy, March 27 available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/694573/Response_letter_from_Melrose_Plc_to_Greg_Clark.pdf

[15] Secretary of State for Business, Energy and Industrial Strategy (Greg Clark), GKN Debate, col. 759 (April 28, 2018).

[16] *See* http://www.theresa2016.co.uk/we_can_make_britain_a_country_that_works_for_everyone.

[17] The Enterprise Act 2002 (Share of Supply Test) (Amendment) Order 2018 available at: www.legislation.gov.uk/uksi/2018/578/pdfs/uksi_20180578_en.pdf; and the Enterprise Act 2002 (Turnover Test) (Amendment) Order 2018 available at: www.legislation.gov.uk/uksi/2018/593/pdfs/uksi_20180593_en.pdf.

These developments are not limited to the UK. In July 2017, Germany widened its scope of review of foreign direct investment. France's President Macron has repeatedly called for EU measures to monitor such investments, and, together with Germany and Italy, circulated a policy paper on possible review measures in July 2017.[18] In September 2017, the European Commission proposed a regulation setting out a framework at EU and Member State level to review foreign investments on grounds of security and public order, as well as a cooperation mechanism among Member States.[19] Increased scrutiny of foreign direct investment has also been considered in Australia, Canada, and the U.S.

Looking forward: will the CMA become a more political institution?

The incoming Chair of the CMA,[20] Andrew Tyrie, a former Member of Parliament and Chair of the Treasury Select Committee and Parliamentary Commission on Banking Standards, remains committed to defending the CMA's independence from political pressure. At his pre-appointment Parliamentary hearing, he told the BEIS Committee that he would "*need* [their] *support to buttress the independence of the CMA, which I think is crucial.*"[21]

The CMA leadership has also spoken publicly about the importance of remaining independent. In a May 2018 speech, CMA Executive Director Michael Grenfell acknowledged that, once it became the UK's State aid regulator, the CMA would face the "*challenge of ensuring… that the CMA retains its reputation for rigour, fairness, respect for the rule of law, and political impartiality and independence*" across all of its functions.[22] And, more recently, responding to a letter from a Member of Parliament concerning the *Sainsbury's/Asda* merger,[23] Andrea Coscelli, the CMA's Chief Executive Officer, explained that "*when investigating a merger, the CMA's mandate, by law, relates to assessing the potential impact of that merger on competition*" and that "*assessing the other potential effects of a merger, such as the impact that a merger could have on employment, falls outside the CMA's statutory powers.*"[24]

The UK Government, like governments elsewhere, is facing strong pressure to take account of non-competition criteria in merger review. It remains to be seen whether that pressure will lead the Government to look for statutory and other ways to intervene in merger control, particularly after Brexit, when the UK may have greater latitude to apply UK merger control rules to transactions currently subject to review by the European Commission.

[18] *See* "European investment policy: A common approach to investment control", (28 July 2017, available at http://politico.us8.list-manage.com/track/click?u=e26c1a1c392386a968d02fdbc&id=c0250f3c3d&e=db5bc20ea2.

[19] Proposal for a Regulation of the European Parliament and of the Council establishing a framework for the screening of foreign direct investments into the European Union, 13 September 2017, COM/2017/0487 final – 2017/0224(COD). This proposal was approved by the European Parliament on 28 May 2018.

[20] *See* https://www.gov.uk/government/news/andrew-tyrie-to-be-chair-of-the-competition-and-markets-authority.

[21] Listen to the pre-appointment hearing here: https://www.parliamentlive.tv/Event/Index/550c0cf5-e80f-4229-adc2-aee144af6d90

[22] Keynote speech given by Michael Grenfell at the Advanced EU competition law conference on 16 May 2018, available at: www.gov.uk/government/speeches/a-view-from-the-cma-brexit-and-beyond.

[23] *See* Letter from Rt. Hon. Robert Halfon MP to the CMA, available at: https://assets.publishing.service.gov.uk/media/5b1515a6ed915d2cccc8d2ff/Letter_from_MP_Robert_Halfon.pdf

[24] *See* CMA's response to the letter from Rt. Hon. Robert Halfon MP, available at: https://assets.publishing.service.gov.uk/media/5b1515b9e5274a191271785 8/letter_to_robert_halfon.pdf

Judgments, Decisions, and News

Court Judgments

Unlockd v Google. On May 9, the High Court granted an interim injunction to Unlockd, a software company that has developed an app to deliver advertisements to consumers when unlocking their Android phones, preventing Google from withdrawing the services that allowed the app to function. Unlockd had entered into a partnership with mobile telephone provider Tesco Mobile, whose app incorporated Unlockd. In granting the injunction, Roth J had regard for the damage to the applicant's commercial relationship with Tesco Mobile absent the injunction, and found that Unlockd had demonstrated that the balance of convenience fell in its favour. On May 25, the High Court granted permission to serve a claim out of jurisdiction on Google LLC, the parent company of Unlockd's contractual counterparties, on the condition that such a claim, which covered infringements of both Articles 101 and 102 TFEU, be restricted to the latter. The trial, on the substantive abuse of dominance allegation, is expected to be heard in July or September.

Gallaher v CMA. On May 16, the Supreme Court allowed an appeal by the CMA in *R* (*on the application of Gallaher Group Ltd and others*) *v CMA*. The case arose from the OFT's 2010 infringement decision in *Tobacco*, in which the respondents and others had entered into early resolution agreements ("**ERAs**") with the OFT in exchange for a fine reduction. One party, TM Retail did not appeal the infringement decision, but was assured by the OFT that it would get the benefit of any successful appeal made by other parties. Six parties successfully appealed to the CAT. TM Retail relied on the assurance and reached a settlement with the OFT in 2012 whereby the penalty was repaid its fine with a contribution of interest. The respondents, who had also entered into ERAs and had not appealed, claimed that they should also have been given the benefit of the assurance given to TM Retail and the subsequent repayment. The Supreme Court found that equal treatment was not a distinct principle of domestic administrative law. Similarly, the Supreme Court held that while fairness, similar to equal treatment, was a fundamental principle of democratic society, simple unfairness as such was not a ground for judicial review. The Supreme Court concluded that the OFT's different treatment of the respondents was objectively justified because: (i) the respondents entered ERAs in full knowledge of the risks, while TM Retail obtained an assurance on which they relied; (ii) TM Retail would have had a strong case for permission to appeal out of time and the appeal was likely to have been successful; and (iii) the respondents were not in a similar position.

Apple v Qualcomm. On May 22, the High Court handed down a judgment concerning claims by smartphone maker Apple against Qualcomm, a holder of a number of patents used in smartphones. Apple brought a contractual claim against Qualcomm's UK subsidiary ("**Qualcomm UK**") alleging that it had breached certain clauses of the Intellectual Property Rights Policy of the European Telecommunications Standards Institute requiring it to give an undertaking to grant licences on FRAND terms. The High Court struck out this claim on the basis that Qualcomm UK was not the owner of the relevant patents. Qualcomm UK therefore could not have given the relevant undertaking, nor was it required to do so. Apple also brought a number of claims against Qualcomm's ultimate parent incorporated in Delaware, the United States ("**Qualcomm US**"), including (i) patent invalidity and exhaustion claims, (ii) a contractual claim similar to the one brought against Qualcomm UK, and (iii) a claim alleging abuse of a dominant position by Qualcomm US in breach of Article 102 of the Treaty of the Functioning of the European Union (the "**TFEU**"). In relation to the Article 102 TFEU claim, Apple required the Court's permission to serve proceedings out of the jurisdiction on Qualcomm US. Apple argued that the English Court should assert jurisdiction on the basis that it had suffered loss within the jurisdiction as a result of Qualcomm US's conduct. Qualcomm US sought a declaration that the English court had no jurisdiction to hear the Article 102 TFEU claim

against it. The High Court reserved judgment on whether permission to serve out should be granted pending submission of further arguments by the parties as to whether Apple had satisfied the requirement that there be a "*plausible evidential basis*" that it had suffered loss in England.

Antitrust/market studies

Carillion report calls for CMA investigation into audit market. On May 16, a joint report by the House of Commons BEIS and Work and Pensions Committees on the Carillion collapse was released, recommending "*that the Government refers the statutory audit market to the* [CMA]. *The terms of reference…should explicitly include consideration of both breaking up the Big Four into more audit firms, and detaching audit arms.*" The report described company-auditor relationships as bearing "*none of the hallmarks of competition.*" Other policy proposals included more regular auditor rotation, and the splitting of audit functions from non-audit services. The report built on similar comments from incoming CMA Chairman Andrew Tyrie, and comes only six weeks after Grant Thornton announced that it would no longer bid for new FTSE 350 audit contracts, thereby reducing competition for statutory audit contracts further.

FCA interim report suggests mortgage market focus. On May 4, the FCA, as part of a mortgage market study, released an interim report identifying preliminary focus areas for improving competition between lenders in the supply, and brokers in the distribution, of mortgages to consumers. The FCA has identified a number of ways in which the market could work better, including the development of a broader range of tools to aid consumers in choosing the right mortgage and the intermediary on an informed basis, and the creation of solutions to facilitate switching for long-term borrowers and so-called "mortgage prisoners". The FCA welcomes comments on the interim report until the end of July.

CMA advocates increased regulation of heat networks. On May 10, the CMA published an update paper as part of its market study into heat networks, finding that, whilst many customers benefit from better prices and customer service than those on a gas or electricity tariff, those unable to opt-out, such as renters, may be losing value. The CMA's provisional finding is that the sector should be regulated. Suggested steps include the creation of consumer protections for all heat network customers; improvements of the design and build of networks; mandatory rules around price and quality in long-term contracts; and improved transparency including better information on networks, agreements for provision of heat supply and bills.

Ofgem Chapter I Statement of Objections (Economy Energy Trading Limited, E (Gas and Electricity) Limited and Dyball Associates Limited). On May 31, Ofgem issued a statement of objections alleging that the two energy suppliers agreed not to target each other's customers, and shared competitively sensitive information, namely details about their customers, to do so. This agreement was facilitated by the consultancy. Following the parties' responses, Ofgem's enforcement decision panel will consider the matter further.

Merger Developments

PHASE 2 INVESTIGATIONS

Electro Rent/Microlease. On May 17, the CMA found that the merger between Electro Rent and Microlease resulted (or may be expected to result) in a significant lessening of competition in the market for the rental of a range of electronic testing and measurement equipment in the UK (devices used to test and measure electronic devices in order to validate their performance across sectors such as telecommunications, aerospace and defence, industrial, and information technology). Following discussions with 45 third parties, the CMA determined that the parties were each other's closest competitors and that customers would in many situations no longer have a choice between rental suppliers post-merger. To remedy the lessening of competition, the CMA required the parties to divest Electro Rent's UK business. The CMA will oversee the divestment and approve the purchaser.

SSE Retail/Npower. On May 8, the CMA announced that it had referred the proposed merger of SSE Retail and Npower (two of the six large energy firms) for a Phase 2 investigation. In its Phase 1 investigation, the CMA found that competition among the large energy companies is "*an important factor*" in how those firms set energy tariffs, and that the lessening of competition could lead to higher customer prices. On May 29, the CMA published its issues statement, setting out its concerns on the effect on the market for the retail supply of electricity and gas on domestic customers in Great Britain. The CMA identified a number of potential theories of harm in addition to the loss of rivalry in the setting of tariff prices, including: whether the merged entity would have the ability and incentive to increase its wholesale price to Utility Warehouse (a mid-tier energy supplier with which it has a supply agreement), and whether small and mid-tier suppliers could be harmed by the merged entity leveraging its increased inactive customer base to cross-subsidise the acquisition tariffs it offers to active customers.

21st Century Fox/Sky. On May 1, the CMA submitted its final report on the proposed acquisition by 21st Century Fox of the 61% of Sky plc that it does not already own to the Secretary of State for Digital, Culture, Media and Sport, Matt Hancock MP. The report found that the proposed acquisition "*may be expected to operate against the public interest*" in relation to media plurality, and recommended prohibition or clearance conditioned on the divestiture of Sky News. On June 5, the Secretary of State announced that he had accepted the CMA's findings on the expected reduction in media plurality. He also announced that he was minded to accept the CMA's recommended remedy, subject to further discussion and consultation on the terms of the proposed divestment.

PHASE 1 CLEARANCE DECISIONS

Informa/UBM. On May 31, the CMA cleared the anticipated acquisition of UBM plc by Informa plc. Both business are involved in, amongst other things, arranging business events such as exhibitions.

Medtronic/Animas. On May 30, the CMA cleared the acquisition of certain assets of Animas Corporation by Medtronic.

J Sainsbury/Asda Group. On May 18, the CMA issued a preliminary invitation to comment on the acquisition of Asda Group. The CMA's invitation for comments in pre-notification reflects the significant public interest in the merger.

Tiancheng International Investment/ Biotest AG. On May 15, the CMA cleared the anticipated acquisition by Tiancheng International Investment Limited of Biotest AG.

ONGOING PHASE 1 INVESTIGATIONS

Parties	Decision due date
Sims Group UK/Morley Waste	August 10, 2018
ATG Media Holdings Limited/Lot-tissimo	July 16, 2018
Restore plc/TNT UK	August 16, 2018
Experian Limited/ Credit Laser Holdings (Clearscore)	July 23, 2018
Arla Foods Limited/Yeo Valley Dairies	July 13, 2018
Sibanye Gold/Lonmin plc	July 10, 2018
Flogas/Countrywide LPG	June 27, 2018 (extended pending provision of information)
Meadow Foods/Roilvest	June 23, 2018
Rentokil Initial/Cannon Hygiene	June 18, 2018
Nielsen/Ebiquity	June 13, 2018
Horizon Global Corporation/Brink International B.V.	June 12, 2018
Trinity Mirror/Northern & Shell Media Group	June 20, 2018

Other Developments

UK Government publishes presentation on UK-EU economic partnership. On May 24, the UK Government presented a blueprint for an economic partnership between the UK and EU after Brexit. The presentation sets out the UK's aim of "*remaining in step with the EU's state aid and competition regimes*."

CAA confirms new Chief Executive. The Civil Aviation Authority confirmed the appointment of Richard Moriarty as its new Chief Executive. Mr Moriarty re-joined the CAA in 2016 as Group Director of Consumers and Markets and Deputy Chief Executive, having previously run the Legal Services Board. Mr Moriarty's responsibilities towards Consumers and Markets have been assumed by Paul Smith, who has experience in the predecessors to Ofcom and Ofgem as well as Australian energy watchdog AEMC.

CMA appoints new head of cartel enforcement and digital. The CMA made two high profile appointments in May. First, Howard Cartlidge was appointed Senior Director, Cartels, arriving from solicitors DWF, and replacing Stephen Blake who moved within the CMA. Second, Stefan Hunt was appointed Chief Data and Digital Insights Officer, arriving from the FCA; Mr Hunt will head a unit dedicated to the analysis of the impact of technology and algorithms on markets.

CMA publishes new guide on good practice in the design and presentation of consumer survey evidence in merger inquiries. As part of its merger review process, the CMA published updated guidelines on quantitative consumer survey evidence. The guidelines highlight a variety of survey factors significant in market assessment, including demographics, geography, closeness of competition and the timing of the survey itself. The guidelines reaffirm principles of survey design including representative coverage, random sample selection and appropriate briefing of field teams.

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