

MAINE STATE LEGISLATURE

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State of Maine

Department of Attorney General

PETROLEUM MARKET SHARE ACT

**REPORT OF THE ATTORNEY GENERAL
TO THE MAINE LEGISLATURE
PURSUANT TO 10 M.R.S.A. § 1677**

**FOR THE REPORTING PERIOD
1998 - 1999**

- I. Executive Summary**
- II. Introduction**
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January 28, 2000

**State of Maine
Department of the Attorney General**

**ANNUAL REPORT OF THE ATTORNEY GENERAL
TO THE MAINE LEGISLATURE
PURSUANT TO 10 M.R.S.A. § 1677**

January 28, 2000

I. EXECUTIVE SUMMARY

This Report is provided by the Attorney General to the Legislature pursuant to Maine's Petroleum Market Share Act ("PMSA"), 10 M.R.S.A. §§ 1671 -1682. The Report represents a view of competition in retail petroleum markets in Maine at the midpoint of calendar year 1999. It is based on data reported to the Attorney General by petroleum wholesalers in accordance with the requirements of the statute. Retail petroleum markets, whether for home heating oil ("HHO") or gasoline ("MFO"), are local markets. The data reported enable the Attorney General to determine how many competitors are active in each of these markets, and what market share each competitor has.

The PMSA has become a linchpin of the Attorney General's antitrust enforcement effort in petroleum markets. Simply put, the ready availability of accurate data means that the Attorney General can determine, rapidly and efficiently, whether a proposed petroleum merger or acquisition will violate antitrust law. Similarly, the data enables the Attorney General to reliably inform the Legislature concerning competitive trends, *i.e.*, whether the level of competition in a given market is increasing or decreasing.

This Report shows that, in mid-1999, Maine's retail HHO markets were in general relatively concentrated. This means that levels of competition within these markets were generally low. The most concentrated, least competitive, markets were those along Maine's southern, northern and western borders, downeast and in the remote interior. A single refiner held significant market share in ten of thirty-three markets.

It is difficult to draw conclusions regarding trends in HHO markets. Viewed from a statewide perspective, the impression would be one of stability in overall levels of competition. Median and average levels of concentration have been stable across six reporting periods, 1992 -1999. Of the thirty-three markets, twenty-two have exhibited varying degrees of stability; only one (Woodland/Calais) has moved consistently toward lower concentration. On the other hand, the Midcoast and Lincoln markets display a trend toward higher concentration; while the Lewiston/Auburn market has shown some recent deterioration.

With respect to MFO, the Report portrays relative overall stability. All sixteen county markets remained relatively stable. The highest concentrations were registered along western and northern borders, downeast, and in the remote interior. A single refiner held the largest or second largest market share in fourteen of Maine's sixteen counties.

The relatively high levels of concentration (and low levels of competition) in some markets do not necessarily mean that Maine consumers are currently being forced to pay higher prices for product than their counterparts in other states. However, increasing concentration in a given market will be a legitimate concern even when it is not immediately accompanied by higher prices. This is because a trend toward concentration is likely to produce higher prices in the long term, while in the near term it may be accompanied by anticompetitive practices, such as predatory pricing.

The PMSA is now scheduled for sunset on September 1, 2005. Currently, the statute represents an essential early warning system, capable of alerting the Attorney General and the Legislature to the need for enforcement action, or for legislation to address the unique problems which could arise in Maine's petroleum markets in the years ahead. At the present time no legislative adjustment appears necessary.

II. INTRODUCTION

The central purpose of Maine's Petroleum Market Share Act ("PMSA"), 10 M.R.S.A. §§ 1671 -1682, is to provide the Attorney General with the ability to monitor levels of concentration in Maine's retail petroleum markets on a current basis. The perception that this monitoring function was both advisable and necessary arose out of a concern that a refiner or refiners could use the advantage conferred by vertical integration¹ to stake out a dominant position in Maine's retail petroleum markets, whether by a program of acquisitions, or otherwise. Indeed, the PMSA was adopted as a moderate alternative to so-called "divorcement" legislation, which would have barred refiners from Maine's retail petroleum markets altogether.

Levels of concentration are also a matter of general concern for reasons of antitrust policy. As levels of concentration in a given market rise, it becomes more likely that a single firm, or group of firms, could successfully exercise market power to levy monopoly profits by charging higher prices. In a rapidly evolving market environment, access to current data regarding levels of concentration is critical to effective antitrust enforcement. It is equally critical to a review of legislative options, and to a determination as to whether more drastic legislative remedies, such as divorcement, merit consideration or adoption. See 10 M.R.S.A. § 1677.

¹ A vertically integrated refiner enjoys two principal advantages over nonintegrated competitors in retail petroleum markets. First, the refiner is independent of the vagaries of wholesale markets; second, the refiner can pass along to its retail arm any economies realized in upstream phases of its integrated operation.

Under the PMSA, the Attorney General reports to the Legislature annually. The required report comprises two elements: first, a recommendation concerning the need for further legislation; and second, an assessment of "the concentration of retail outlets in the State or in sections of the State." The required report may not disclose the identity of any particular retailer or retail outlet. Id.

The report which follows is divided into two sections. In the first, following an explanation of the antitrust methodology used, we evaluate levels of concentration and review trends. In the final section, we conclude that there is no current need for legislative adjustment.

III. LEVELS OF CONCENTRATION IN MAINE'S RETAIL PETROLEUM MARKETS

A. Methodology

The methodology employed by the Attorney General to assess levels of concentration in Maine's retail petroleum markets, as reflected in this report, is essentially the same methodology used by the U.S. Department of Justice, the Federal Trade Commission and the Attorneys General of the several states in evaluating the legality of any given merger or acquisition under applicable antitrust law. Since the Attorney General has been notably active in enforcing Maine's merger law, 10 M.R.S.A. § 1102-A, in recent years, this office has developed a familiarity with, and expertise in the required analysis.

1. Market Definition The first step in this analysis is to define the relevant product and geographical markets. The product markets on which this report will focus are the retail markets for HHO and MFO as defined in the PMSA. HHO is defined as "#2 fuel oil sold for heating residential, industrial or commercial space or water". MFO "means internal combustion fuel sold

for use in motor vehicles" as more fully defined in 29 M.R.S.A. § 1(7). See 10 M.R.S.A. § 1672(3) and (4).²

The relevant geographic markets are more problematic. In layman's terms, the task of defining the relevant geographic market is essentially one of determining who competes against whom in a given locality or region. Market definition is not an exact science. Few markets can be geographically delineated with absolute certainty that the chosen contours accurately reflect human economic behavior. For better or for worse, the task of defining a geographic market will always be one of approximation.

The Attorney General has taken quite different approaches to defining geographic markets within the State for HHO on the one hand, and MFO on the other. In the case of HHO, we have conducted a series of interviews with a number of persons knowledgeable in and about the petroleum industry in this State.³ On this basis, we have divided the State into thirty-three separate geographic markets which, we believe, represent a fair approximation of economic and competitive realities. A map depicting these markets is attached hereto as Appendix A. While we have no doubt that it will prove necessary to refine our conception of the boundaries of these markets over time, and would welcome comment from any reader of this report, we remain confident that the HHO geographic markets analyzed here would, by and large, stand up to antitrust scrutiny in any forum.

Markets for MFO within the State, however, operate differently from those for HHO. While HHO markets typically encompass a geographic region, however limited -- for example, the

² In general, HHO and MFO, as defined in the statute, are properly susceptible of antitrust analysis as distinct product markets.

³ The assistance of Eugene Guilford, President of the Maine Oil Dealers Association, is particularly acknowledged.

St. John Valley, or Mount Desert Island -- MFO markets may be more localized. The task before us here, however, is not the analysis of a merger in a local market. We have determined that for purposes of monitoring broad trends toward concentration across the State, to focus on such narrow geographic markets would be counterproductive. Instead, we employ Maine's sixteen counties as hypothetical MFO geographic markets.⁴ Wherever a trend toward concentration is observed within these hypothetical markets, a fuller and more accurate analysis can be brought to bear, in order to pinpoint the geographic sources of the trend.

2. **Herfindahl-Hirschman Index**. No market is perfectly competitive, and there are varying degrees of competition. The most important factor affecting competition in a given market is the level of concentration.⁵ Federal and state antitrust agencies (including the Department) employ the Herfindahl-Hirschman Index (HHI) to measure market concentration.⁶ The HHI is arrived at by squaring the market shares of all the competitors in a given market. This simple mathematical device expresses the insight that market power increases exponentially in proportion to market share. Federal antitrust guidelines used by the Department in merger enforcement indicate that a market with an HHI of 1000 or less should be viewed as unconcentrated (and therefore likely to function competitively).⁷ A market with an HHI between 1000 and 1800 is described as moderately concentrated; while any HHI over 1800 is termed

⁴ Use of county markets also permits a meaningful integration of MFO bulk sales to end users into the calculation of market share.

⁵ That competition in turn represents the best guarantee to consumers of high quality and low price needs no emphasis here.

⁶ DOJ/FTC Horizontal Merger Guidelines, 57 Fed. Reg. 41552 (1992).

⁷ For example, ten firms with market shares of 10% each would yield an HHI of 1000 (10 squared x 10).

highly concentrated.⁸ A market in the highly concentrated category is subject to a high degree of market power.

We have used the HHI in this report to quantify, compare and evaluate levels of concentration in Maine's retail petroleum markets. Our analysis of levels of concentration in HHO markets tracks the categories reflected in federal guidelines. Thus, an HHO market with an HHI under 1000 is referred to as "unconcentrated"; an HHI in the 1000 -1800 range is described as "moderately concentrated"; and an HHI in the 1800 -2500 range is termed "highly concentrated". We add a new appellation for markets above 2500 points, which are referred to as "extremely concentrated."

For MFO markets we have employed different categories in order to reflect the fact that the county geographic markets arbitrarily used to facilitate the analysis inevitably understate levels of concentration. Thus, for MFO, an HHI below 500 is "unconcentrated"; 500 -1000 is "moderately", and 1000 -1800 is "highly concentrated". The "extremely concentrated" designation is reserved for MFO markets above 1800.

B. Levels Of Concentration

Data assembled from reports submitted by wholesalers and refiners pursuant to the PMSA have permitted us to calculate the annual gallonage supplied to each HHO and MFO retailer and retail outlet located in the State. These annual gallonage figures, in turn, provide the basis for arriving at the percentage market shares held by each retailer in every geographic market in the State. We have calculated HHIs by squaring the percentage market shares arrived at for each competitor, and deriving a total figure for each market. These HHI figures are set forth in Appendix B below.

⁸ For example, a market comprising five firms with market shares of 20% each would yield an HHI of 2000 (20 squared x 5).

1. Overview: Retail Home Heating Oil Markets. Levels of concentration in Maine's retail HHO markets remain high. Only three of thirty-three markets (Portland, Skowhegan and Belfast) could be characterized as unconcentrated, with an HHI below 1000. At the other end of the spectrum, eleven markets showed extremely high levels of concentration, racking up HHI totals over 2500 points each. These were Bethel, Cherryfield/Machias, Jackman/Greenville, Lincoln, Midcoast, Mount Desert, Pittsfield/Newport, St. John Valley, Sanford, South Paris and York.⁹ Marked deterioration in Lincoln (up 1872 points), Jackman/Greenville (up 908) and Pittsfield/Newport (up 823) was especially noteworthy. On the other hand, improvement in Rumford/Rangeley (down 2026 points), Belfast (down 1860), Limerick (down 945), Biddeford/Saco (down 697) and Skowhegan (down 614) lent a rosier tone to the overall picture.

Of the remaining nineteen markets, eleven fell into the 1800 -2500 point range, and would therefore qualify as highly concentrated under the standards set by federal guidelines; eight were moderately concentrated, *i.e.*, in the 1000 -1800 range. It is noteworthy that while some of Maine's urban centers, namely Augusta, Bangor and Portland, remained unconcentrated or only moderately concentrated, others, such as Ashland/Presque Isle, Bath/Brunswick, Biddeford/Saco, Lewiston/Auburn and Waterville, fell into the highly concentrated categories.¹⁰

In regional terms, several generalizations can be made. First, all markets along Maine's western and southern borders (with the notable exception of Rumford/Rangeley) remained highly to extremely concentrated. The remote interior (Farmington, Jackman/Greenville, Dover/Foxcroft, Lincoln) was highly to extremely concentrated. Downeast markets were mixed.

⁹ Lincoln, South Paris and Jackman/Greenville scored above 4000 points. As a reminder, a typical example of a market over 4000 points might consist of three competitors, with 55%, 25% and 20% market shares, respectively.

¹⁰ However, no urban center displayed extreme concentration.

Cherryfield/Machias and Mount Desert were extremely concentrated; Ellsworth and Woodland/Calais fell into the moderately concentrated category. Aroostook County (Ashland/Presque Isle, Houlton and St. John Valley) was highly to extremely concentrated. The coast from Portland north to Bucksport was a mixed bag, with Belfast unconcentrated, and Rockland in the moderate category, while the Midcoast and Bath/Brunswick were highly concentrated.

Of the eleven most concentrated markets in the State, a refiner commanded significant market share¹¹ in four (up from two). In the other seven extremely concentrated markets, refiners had either no presence or only a modest presence. More broadly, a refiner led the field in six markets statewide (up from four last year, but down from seven the previous two years) and held second place in four others. Heightened concern is warranted with respect to those markets combining high concentration with a high level of refiner participation.

Overall, the available data suggests a picture of relative stability, with the average HHI remaining within a range of 335 points over a seven-year period (a low of 2155 in 1996 -1997; a high of 2490 in 1992 -1993) and the median HHI remaining within a range of less than three hundred points (currently 1979).

In sum, a comparison of 1998 -1999 data for retail HHO markets against those for the preceding five years shows that while overall levels of competition and concentration have remained relatively stable, there are grounds for concern in specific markets which remain extremely concentrated or exhibit a trend toward increasing concentration.

¹¹ In excess of 20%.

The Attorney General remains concerned by the generally high levels of concentration in this industry.¹² Our concern would increase in the event a consistent trend toward further concentration were to emerge.¹³ There appear to be localized trends toward further concentration. At this juncture, however, with the exception of a single market, these trends cannot be attributed to increasing refiner participation. Indeed, in many cases, increasing refiner participation appears to be having a beneficial short-term effect on levels of concentration. However, vigilance and careful monitoring remain the order of the day.

2. Overview: Retail Motor Fuel Oil Markets. Three of the county MFO markets listed in Appendix B fall into the unconcentrated category (Cumberland, Knox and York); six others are only moderately concentrated (Androscoggin, Franklin, Hancock, Kennebec, Sagadahoc and Waldo). The remainder (Aroostook, Lincoln, Oxford, Penobscot, Piscataquis, Somerset and Washington) are highly concentrated; however, none merits the "extremely concentrated" designation. In all counties, levels of concentration have remained relatively stable over seven reporting periods.

It remains that the HHI levels shown in Appendix B significantly understate the actual levels of concentration which would be found in the narrower geographic markets suitable for purposes of merger analysis. These HHI figures should not, therefore, be read as a guide to how this office would approach antitrust review of any proposed acquisition.

¹² It is important to note that high levels of concentration do not necessarily translate immediately into high retail prices for HHO. However, a trend toward higher levels of concentration could portend higher retail prices in the future. For this reason, the Attorney General will pay close attention to any such trend, and, with an eye to the motivating purpose of the PMSA program, will also pay close attention to the part played by refiners in bringing about any such trend.

¹³ Indeed, a single proposed acquisition in a concentrated market can give cause for concern great enough to warrant an action to bar the transaction under the state merger statute, 10 M.R.S.A. § 1102-A.

In eight of Maine's sixteen county MFO markets, at least one competitor enjoyed a market share in excess of 20%; in three of these (down from four), market shares above 30% were registered. Today, a refiner holds first or second place in terms of market share in fourteen of Maine's sixteen counties (up from ten, five years ago), with a leading position in ten of these. In six counties (no change from last year), a refiner held a market share in excess of 20%; a refiner's market share exceeded 30% in two of these counties (down from three). Refiner dominance in some of Maine's county markets remains a matter for concern.

In MFO markets, a stronger tendency toward concentration is noticeable in western, northern, interior and downeast sections. A tendency toward concentration also obtains in the southern midcoast area (Lincoln) -- an apparent anomaly, since other coastal counties (except Washington) were less prone to concentration. The median and average HHIs for the State are indicative of moderate, rather than extreme levels of concentration; these have remained relatively stable (within a range of 300 points) over seven reporting periods.

While the relative overall stability of these markets suggests that there is no immediate reason for alarm, the Attorney General is concerned about continued high levels of concentration in seven of Maine's sixteen counties. In all of these counties, a refiner held the largest (five counties) or second largest (two counties) market share. Further increases in refiner market share in these counties might well result in greater concentration. Continued vigilance, and continued careful monitoring, are therefore warranted.

IV. LEGISLATIVE RECOMMENDATION

The concept of the PMSA program has been tested in action; initial glitches have been corrected and the program is in operation and working well. The Attorney General is now in a

position to follow trends in Maine's petroleum markets on a current basis, and to react swiftly by seeking remedies in court, or in the Legislature should need arise.

The PMSA program was adopted in the first place because it was felt that in a rapidly evolving market environment, there was a serious risk that routine enforcement would be ineffective -- that it would accomplish too little, too late. Nothing has intervened to alter that equation, and the risk remains.

Further, the PMSA program was conceived, not as a means of affording the Attorney General a one-time look at levels of concentration in Maine's petroleum markets, but as a means to follow and evaluate trends. It would accordingly be inadvisable to eliminate the program. The problem which the PMSA was designed to address is not likely to go away in the near term; nor should the program itself.

It is the Attorney General's considered view that the PMSA program is working well and remains an essential component of an effective competition strategy for Maine's petroleum markets. Accordingly, no legislative adjustment is currently recommended.

Respectfully submitted,

Dated: 1/29/00

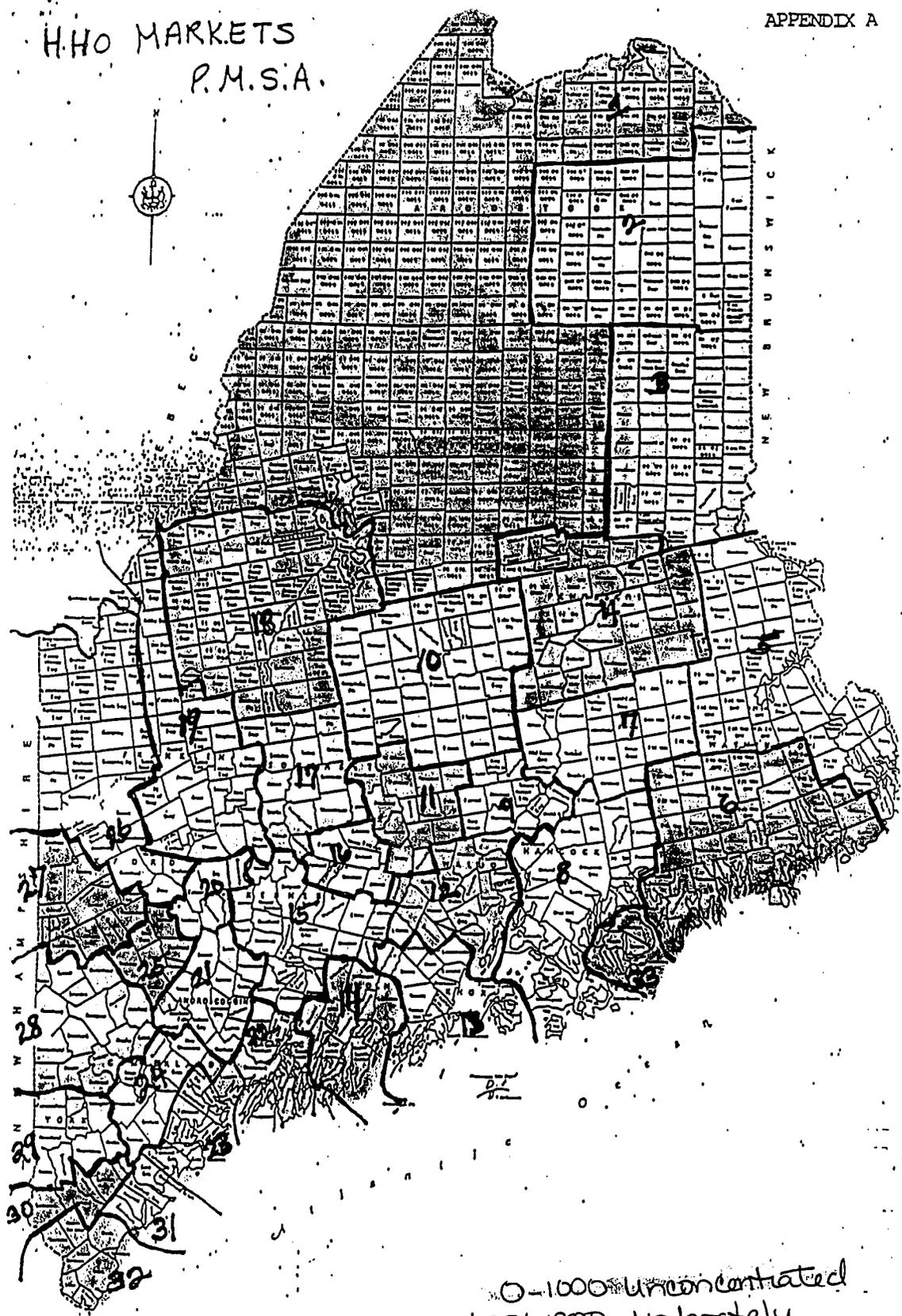
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Assistant Attorney General

H.H.O MARKETS
P.M.S.A.

APPENDIX A



0-1000 Unconcentrated
1001-1800 Moderately
1801-2500 Highly
~~2500+ Over Concentrated~~

APPENDIX B

This appendix sets forth HHI figures for Maine's retail petroleum markets. As we note in the text above, these are derived from data reported to us by wholesalers and refiners pursuant to the PMSA.

It should be noted that in the case of HHO markets located along the Maine-New Hampshire border, available data do not indicate market shares held by cross-border competitors. Accordingly, HHIs for these markets are based to some extent on estimates. We indicate below wherever an estimate is used.

The Attorney General is forbidden by statute to disclose the identity of any retailer or retail outlet in making his report. The market summaries offered below therefore set forth only (1) geographic location (for HHO markets, reference should be made to the map attached hereto as Appendix A); (2) number of competitors; (3) HHI; and (4) a characterization of the level of concentration. We have used four characterizations, loosely derived from federal and NAAG guidelines, as follows. For HHO markets, an HHI in the 0 -1000 range is viewed as "unconcentrated"; in the 1000 -1800 range, the characterization is "moderately concentrated"; in the 1800 -2500 range, an HHI is rated "highly concentrated"; while in the 2500 plus range, the phrase "extremely concentrated " is used. For MFO markets, the use of broad county geographic markets results in understated HHI figures. Accordingly, an index in the 1- 500 range is seen as unconcentrated; 500 -1000 as moderately concentrated; 1000 -1800 as highly, and above 1800 as extremely concentrated.

MFO LEAGUE TABLE						
June 1, '92-May 31, '93	June 1, '93-May 31, '94	June 1, '94-May 31, '95	June 1, '95-May 31, '96	June 1, '96-May 31, '97	June 1, '97-May 31, '98	June 1, '98-May 31, '99
Cumberland 415	Cumberland 416 (+1)	York 341 (-104)	Cumberland 394 (-81)	Cumberland 356 (-38)	Cumberland 345 (-11)	Cumberland 386 (+41)
York 452	York 445 (-7)	Cumberland 475 (+59)	York 396 (+55)	York 394 (-2)	Knox 427 (-3)	Knox 456 (+29)
Androscoggin 482	Knox 503 (-7)	Knox 528 (+25)	Androscoggin 530 (-17)	Knox 430 (-100)	York 465 (+71)	York 462 (-3)
Knox 510	Androscoggin 511 (+29)	Androscoggin 547 (+36)	Knox 530 (+2)	Androscoggin 482 (-48)	Androscoggin 512 (+30)	Hancock 572 (+28)
Lincoln 714	Hancock 580 (-392)	Waldo 735 (+60)	Waldo 637 (-98)	Hancock 500 (-203)	Hancock 544 (+44)	Waldo 597 (+29)
Penobscot 971	Franklin 673 (-333)	Hancock 791 (+211)	Hancock 703 (-88)	Waldo 536 (-101)	Waldo 568 (+32)	Androscoggin 610 (+98)
Hancock 972	Waldo 675 (-638)	Lincoln 837 (+116)	Penobscot 870 (+8)	Kennebec 802 (-70)	Kennebec 826 (+24)	Kennebec 625 (-201)
Kennebec 974	Lincoln 721 (+7)	Penobscot 862 (+63)	Kennebec 872 (-192)	Franklin 895 (-252)	Penobscot 831 (-72)	Sagadahoc 770 (-110)
Franklin 1006	Kennebec 785 (-189)	Sagadahoc 935 (+33)	Lincoln 1054 (+217)	Lincoln 900 (-154)	Sagadahoc 880 (-417)	Franklin 941 (-58)
Washington 1124	Penobscot 799 (-172)	Kennebec 1064 (+279)	Washington 1081 (-247)	Penobscot 903 (+33)	Franklin 999 (+104)	Oxford 1002 (-237)
Waldo 1313	Sagadahoc 902 (-600)	Franklin 1203 (+530)	Franklin 1147 (-56)	Oxford 1079 (-107)	Somerset 1048 (-119)	Penobscot 1049 (+218)
Aroostook 1343	Aroostook 1073 (-270)	Oxford 1223 (-108)	Sagadahoc 1166 (+231)	Somerset 1167 (-454)	Lincoln 1065 (+165)	Lincoln 1075 (+10)
Sagadahoc 1502	Washington 1140 (+16)	Aroostook 1323 (+250)	Aroostook 1176 (-147)	Aroostook 1216 (+40)	Oxford 1239 (+160)	Somerset 1103 (+55)
Oxford 1594	Somerset 1140 (-978)	Washington 1328 (+188)	Oxford 1186 (-37)	Sagadahoc 1297 (+131)	Aroostook 1426 (+210)	Aroostook 1269 (-158)
Piscataquis 1878	Oxford 1331 (-263)	Somerset 1722 (+582)	Somerset 1621 (-101)	Washington 1314 (+233)	Washington 1508 (+194)	Washington 1690 (+182)
Somerset 2096	Piscataquis 1662 (-216)	Piscataquis 1891 (+229)	Piscataquis 1652 (-239)	Piscataquis 1755 (+103)	Piscataquis 1658 (-97)	Piscataquis 1780 (+122)
AVERAGE 1084	AVERAGE 835	AVERAGE 988	AVERAGE 938	AVERAGE 876	AVERAGE 896	AVERAGE 899
MEDIAN 990	MEDIAN 753	MEDIAN 899	MEDIAN 963	MEDIAN 897	MEDIAN 855	MEDIAN 855

HHO LEAGUE TABLE						
June 1, '92-May 31, '93	June 1, '93-May 31, '94	June 1, '94-May 31, '95	June 1, '95-May 31, '96	June 1, '96-May 31, '97	June 1, '97-May 31, '98	June 1, '98-May 31, '99
Augusta 922	Augusta 714 (-208)	Augusta 696 (-18)	Augusta 775 (+79)	Augusta 777 (+2)	Augusta 755 (-22)	Skowhegan 577 (-614)
Belfast 984	Belfast 899 (-85)	Portland 1020 (-148)	Portland 776 (-244)	Portland 972 (+196)	Portland 775 (-197)	Portland 714 (-61)
Portland 1097	Rockland 1069 (-252)	Rockland 1061 (-8)	Biddeford/Saco 1025 (-532)	Belfast 1052 (-132)	Bangor 958 (-146)	Belfast 945 (-1860)
Gray 1281	Portland 1168 (+71)	Gray 1108 (-464)	Rockland 1125 (+64)	Bangor 1104 (-456)	Skowhegan 1191 (-35)	Bangor 1079 (+121)
Lincoln 1316	Skowhegan 1317 (-301)	Belfast 1126 (+227)	Gray 1172 (+64)	Rockland 1111 (-24)	Rockland 1248 (+137)	Rumford/Rangeley 1250 (-2026)
Rockland 1321	Biddeford/Saco 1323 (-201)	Skowhegan 1187 (-130)	Belfast 1184 (+58)	Skowhegan 1228 (-18)	Ellsworth 1350 (-520)	Rockland 1263 (+15)
Biddeford/Saco 1524	Bangor 1342 (-291)	Lewiston/Auburn 1448 (-69)	Skowhegan 1244 (+57)	Gray 1398 (+226)	Lewiston/Auburn 1481 (-85)	Old Town 1377 (+355)
Waterville 1548	Waterville 1370 (-178)	Ashland/Presque Isle 1531 (-26)	Waterville 1539 (-71)	Biddeford/Saco 1418 (+393)	Gray 1493 (+95)	Augusta 1489 (+734)
Lewiston/Auburn 1613	Lewiston/Auburn 1517 (-96)	Bangor 1550 (+208)	Bangor 1560 (+10)	Lewiston/Auburn 1566 (-223)	Waterville 1569 (-407)	Woodland/Calais 1593 (-358)
Skowhegan 1618	Ashland/Presque Isle 1557 (-368)	Biddeford/Saco 1557 (+234)	Woodland/Calais 1631 (-701)	Old Town 1605 (-82)	Bath/Brunswick 1731 (+62)	Ellsworth 1605 (+255)
Bangor 1633	Gray 1572 (+291)	Waterville 1610 (+240)	Old Town 1687 (+56)	Woodland/Calais 1646 (+15)	Old Town 1732 (+127)	Gray 1641 (+148)
Old Town 1709	Pittsfield/Newport 1693 (-403)	Old Town 1631 (-366)	Farmington 1772 (-240)	Bath/Brunswick 1669 (-1177)	Houlton 1785 (-223)	Biddeford/Saco 1802 (-697)
Bath/Brunswick 1921	Lincoln 1940 (+624)	Houlton 1969 (-113)	Lewiston/Auburn 1789 (+341)	Cherryfield/Machias 1692 (-283)	Woodland/Calais 1951 (+305)	Ashland/Presque Isle 1824 (355)
Ashland/Presque Isle 1925	Rumford/Rangeley 1989 (+63)	Pittsfield/Newport 1971 (+278)	Pittsfield/Newport 1822 (-149)	Ellsworth 1870 (-103)	Pittsfield/Newport 2018 (-53)	Waterville 1837 (+268)
Rumford/Rangeley 1926	Old Town 1997 (+288)	Ellsworth 2001 (-58)	Dover-Foxcroft 1886 (-666)	Farmington 1877 (+105)	Lincoln 2164 (-1509)	Houlton 1955 (+170)
Houlton 1973	Ellsworth 2059 (-108)	Farmington 2012 (-346)	Ashland/Presque Isle 1962 (+431)	Waterville 1976 (+437)	Ashland/Presque Isle 2179 (+51)	Dover-Foxcroft 1969 (-340)
Dover-Foxcroft 2096	Houlton 2082 (+109)	Rumford/Rangeley 2047 (+58)	Ellsworth 1973 (-28)	Houlton 2008 (-43)	Bridgton 2199 (-355)	Limerick 1979 (-954)
Pittsfield/Newport 2096	Bath/Brunswick 2169 (+248)	Cherryfield/Machias 2066 (-486)	Cherryfield/Machias 1975 (-91)	Jackman/Greenville 2058 (-76)	Mid Coast 2253 (+163)	Bath/Brunswick 2130 (+399)
Ellsworth 2167	Dover-Foxcroft 2191 (+95)	Bath/Brunswick 2081 (-88)	Houlton 2051 (+82)	Pittsfield/Newport 2071 (+249)	Farmington 2290 (+413)	Lewiston/Auburn 2148 (+667)
Cherryfield/Machias 2228	Woodland/Calais 2237 (-1129)	Woodland/Calais 2332 (+95)	Jackman/Greenville 2134 (-1139)	Midcoast 2090 (-1537)	Dover-Foxcroft 2309 (+122)	Bridgton 2217 (+18)
Farmington 2257	Farmington 2358 (+101)	St. John Valley 2400 (-139)	York 2146 (estimate) (-4234)	Ashland/Presque Isle 2128 (+166)	Cherryfield/Machias 2311 (+619)	Farmington 2221 (-69)
Bridgton 2400 (estimate)	St. John Valley 2539 (+1)	Bridgton 2443 (estimate) (-246)	Limerick 2273 (-674)	Dover-Foxcroft 2187 (+301)	Mt. Desert 2478 (-290)	Jay 2319 (-430)
St. John Valley 2538	Cherryfield/Machias 2552(+324)	Lincoln 2469 (+529)	St. John Valley 2513 (+113)	Bridgton 2554 (estimate) (-2681)	Biddeford/Saco 2499 (+1081)	Cherryfield/Machias 2525 (+214)
Mt. Desert 2762	Bridgton 2689 (estimate) (+289)	Dover-Foxcroft 2552 (+361)	Jay 2789 (-673)	Rumford/Rangeley 2690 (-199)	St. John Valley 2659 (-232)	Mid Coast 2624 (+371)
Limerick 2992	Limerick 3085 (+93)	Limerick 2947 (-138)	Bath/Brunswick 2846 (+765)	Mt. Desert 2768 (-584)	Jay 2749 (-802)	York 2752 (-4559)
Jay 3211	Jay 3368 (+157)	Jackman/Greenville 3273 (-261)	Rumford/Rangeley 2889 (+842)	Limerick 2776 (+503)	Belfast 2805 (+1753)	Mt. Desert 2789 (+311)
Woodland/Calais 3366	Jackman/Greenville 3534 (-1997)	South Paris 3361 (-797)	Mt. Desert 3352 (-742)	York 2842 (estimate) (+696)	Limerick 2933 (+157)	St. John Valley 2793 (+134)
Midcoast 3680	Mt. Desert 4084 (+1322)	Jay 3462 (+94)	Lincoln 3394 (+925)	St. John Valley 2891 (+378)	Bethel 3185 (-853)	Pittsfield/Newport 2841 (+823)
South Paris 3706	South Paris 4158 (+452)	Mt. Desert 4094 (+10)	Midcoast 3627 (-1921)	Jay 3551 (+762)	Rumford/Rangeley 3276 (+586)	Bethel 3308 (+123)
Sanford 4000 (estimate)	Midcoast 4190 (+510)	Sanford 4576 (estimate) (+184)	South Paris 3903 (+542)	Lincoln 3673 (+279)	South Paris 3847 (-142)	Sanford 3715 (-518)
Jackman/Greenville 5531	Sanford 4392 (estimate) (+392)	Bethel 5000 (+59)	Sanford 4313 (estimate) (-263)	Sanford 3829 (estimate) (-484)	Sanford 4233 (+404)	Lincoln 4036 (+1872)
Bethel 5634	Bethel 4941 (-693)	Midcoast 5548 (+1358)	Bethel (no change)	South Paris 3989 (+86)	Jackman/Greenville 4786 (+2728)	South Paris 4170 (+323)
York 8000 (estimate)	York 6855 (estimate) (-1145)	York 6380 (estimate) (-475)	Bridgton (estimate) (+2792)	Bethel 4038 (-962)	York 7311 (estimate) (+4469)	Jackman/Greenville 5694 (+908)
AVERAGE 2490	AVERAGE 2387	AVERAGE 2417	AVERAGE 2284	AVERAGE 2155	AVERAGE 2378	AVERAGE 2217
MEDIAN 1973	MEDIAN 2059	MEDIAN 2047	MEDIAN 1973	MEDIAN 2008	MEDIAN 2199	MEDIAN 1979

MFO Market Area

6/1/92-5/31/93

6/1/93-5/31/94

6/1/94-5/31/95

6/1/95-5/31/96

6/1/96-5/31/97

6/1/97-5/31/98

6/1/98-5/31/99

MFO Market Area		6/1/92-5/31/93	6/1/93-5/31/94	6/1/94-5/31/95	6/1/95-5/31/96	6/1/96-5/31/97	6/1/97-5/31/98	6/1/98-5/31/99
Androscoggin	Competitors HHI Concentration	52 482 Unconcentrated	64 (+12) 511 (+29) Moderately	65 (+1) 547 (+36) Moderately	65 (no change) 530 (-17) Moderately	70 (+5) 482 (-48) Unconcentrated	63 (-7) 512 (+30) Moderately	68 (+5) 610 (+98) Moderately
Aroostook	Competitors HHI Concentration	90 1343 Highly	90 (no change) 1073 (-270) Highly	87 (-3) 1323 (+250) Highly	104 (+17) 1176 (-147) Highly	108 (+4) 1216 (+40) Highly	94 (-14) 1426 (+210) Highly	92 (-2) 1268 (-158) Highly
Cumberland	Competitors HHI Concentration	128 415 Unconcentrated	156 (+28) 416 (+1) Unconcentrated	147 (-9) 475 (+59) Unconcentrated	202 (+55) 394 (-81) Unconcentrated	193 (-9) 356 (-38) Unconcentrated	220 (+27) 345 (-11) Unconcentrated	247 (+27) 386 (+41) Unconcentrated
Franklin	Competitors HHI Concentration	35 1006 Highly	40 (+5) 673 (-333) Moderately	38 (-2) 1203 (+530) Highly	42 (+4) 1147 (-56) Highly	46 (+4) 895 (-252) Moderately	47 (+1) 999 (+104) Moderately	43 (-4) 941 (-58) Moderately
Hancock	Competitors HHI Concentration	53 972 Moderately	72 (+19) 580 (-392) Moderately	65 (-7) 791 (+211) Moderately	73 (+8) 703 (-88) Moderately	74 (-1) 500 (-203) Unconcentrated	72 (-2) 544 (+44) Moderately	75 (+3) 572 (+28) Moderately
Kennebec	Competitors HHI Concentration	70 974 Moderately	81 (+11) 785 (-189) Moderately	92 (+11) 1064 (+279) Highly	93 (+1) 872 (-192) Moderately	91 (-2) 802 (-70) Moderately	92 (+1) 826 (+24) Moderately	92 (no change) 625 (-201) Moderately
Knox	Competitors HHI Concentration	59 510 Moderately	63 (+4) 503 (-7) Moderately	71 (+8) 528 (+25) Moderately	85 (+14) 530 (+2) Moderately	86 (+1) 430 (-100) Unconcentrated	84 (-2) 427 (-3) Unconcentrated	77 (-7) 456 (+29) Unconcentrated
Lincoln	Competitors HHI Concentration	25 714 Moderately	35 (+10) 721 (+7) Moderately	34 (-1) 837 (+116) Moderately	37 (+3) 1054 (+217) Highly	38 (+1) 900 (-154) Moderately	36 (-2) 1065 (+165) Highly	39 (+3) 1075 (+10) Highly
Oxford	Competitors HHI Concentration	31 1594 Highly	44 (+13) 1331 (-263) Highly	43 (-1) 1223 (-108) Highly	49 (+6) 1186 (-37) Highly	52 (+3) 1079 (-107) Highly	54 (+2) 1239 (+160) Highly	56 (+2) 1002 (-237) Highly
Penobscot	Competitors HHI Concentration	137 971 Moderately	148 (+11) 799 (-172) Moderately	143 (-5) 862 (+63) Moderately	156 (+13) 870 (+8) Moderately	156 (no change) 903 (+33) Moderately	146 (-10) 831 (-72) Moderately	141 (-5) 1049 (+218) Highly
Piscataquis	Competitors HHI Concentration	25 1878 Extremely	38 (+13) 1662 (-216) Highly	36 (-2) 1891 (+229) Extremely	32 (-4) 1652 (-239) Highly	25 (-7) 1755 (+103) Highly	23 (-2) 1658 (-97) Highly	29 (+6) 1780 (+122) Highly

HHO Market Area		6/1/92-5/31/93	6/1/93-5/31/94	6/1/94-5/31/95	6/1/95-5/31/96	6/1/96-5/31/97	6/1/97-5/31/98	6/1/98-5/31/99
01. St. John Valley	Competitors HHI Concentration	6 2538 Extremely	7 (+1) 2539 (+1) Extremely	7 (no change) 2400 (-139) Highly	6 (-1) 2513 (+113) Extremely	9 (+3) 2891 (+378) Extremely	5 (-4) 2659 (-232) Extremely	5 (no change) 2793 (+134) Extremely
02. Ashland/Presque Isle	Competitors HHI Concentration	19 1925 Highly	21 (+2) 1557 (-368) Moderately	22 (+1) 1531 (-26) Moderately	18 (-4) 1962 (+431) Highly	15 (-3) 2128 (+166) Highly	18 (+3) 2179 (+51) Highly	13 (-5) 1824 (-355) Highly
03. Houlton	Competitors HHI Concentration	10 1973 Highly	8 (-2) 2082 (+109) Highly	8 (no change) 1969 (-113) Highly	9 (+1) 2051 (+82) Highly	9 (no change) 2008 (-43) Highly	9 (no change) 1785 (-223) Moderately	9 (no change) 1955 (+170) Highly
04. Lincoln	Competitors HHI Concentration	10 1316 Moderately	13 (+3) 1940 (+624) Highly	11 (-2) 2469 (+529) Highly	12 (+1) 3394 (+925) Extremely	9 (-3) 3673 (+279) Extremely	10 (+1) 2164 (-1509) Highly	16 (+6) 4036 (+1872) Extremely
05. Woodland/Calais	Competitors HHI Concentration	9 3366 Extremely	15 (+6) 2237 (-1129) Highly	9 (-6) 2332 (+95) Highly	15 (+6) 1631 (-701) Moderately	15 (no change) 1646 (+15) Moderately	10 (-5) 1951 (+305) Highly	10 (no change) 1593 (-358) Moderately
06. Cherryfield/Machias	Competitors HHI Concentration	10 2228 Highly	14 (+4) 2552 (+324) Extremely	7 (-7) 2066 (-486) Highly	13 (+6) 1975 (-91) Highly	17 (+4) 1692 (-283) Moderately	9 (-8) 2311 (+619) Highly	7 (-2) 2525 (+214) Extremely
07. Old Town	Competitors HHI Concentration	10 1709 Moderately	10 (no change) 1997 (+288) Highly	11 (+1) 1631 (-366) Moderately	10 (-1) 1687 (+56) Moderately	10 (no change) 1605 (-82) Moderately	11 (+1) 1732 (+127) Moderately	13 (+2) 1377 (+355) Moderately
08. Ellsworth	Competitors HHI Concentration	22 2167 Highly	20 (-2) 2059 (-108) Highly	17 (-3) 2001 (-58) Highly	20 (+3) 1973 (-28) Highly	18 (-2) 1870 (-103) Highly	22 (+4) 1350 (-520) Moderately	23 (+1) 1605 (+255) Moderately
09. Bangor	Competitors HHI Concentration	36 1633 Moderately	35 (-1) 1342 (-291) Moderately	32 (-3) 1550 (+208) Moderately	37 (+5) 1560 (+10) Moderately	40 (+3) 1104 (-456) Moderately	36 (-4) 958 (-146) Unconcentrated	26 (-10) 1079 (+121) Moderately
10. Dover-Foxcroft	Competitors HHI Concentration	9 2096 Highly	9 (no change) 2191 (+95) Highly	9 (no change) 2552 (+361) Extremely	12 (+3) 1886 (-666) Highly	10 (-2) 2187 (+301) Highly	11 (+1) 2309 (+122) Highly	12 (+1) 1969 (-340) Highly
11. Pittsfield/Newport	Competitors HHI Concentration	15 2096 Highly	13 (-2) 1693 (-403) Moderately	10 (-3) 1971 (+278) Highly	13 (+3) 1822 (-149) Highly	9 (-4) 2071 (+249) Highly	10 (+1) 2018 (-53) Highly	12 (+2) 2841 (+823) Extremely

HHO Market Area		6/1/92-5/31/93	6/1/93-5/31/94	6/1/94-5/31/95	6/1/95-5/31/96	6/1/96-5/31/97	6/1/97-5/31/98	6/1/98-5/31/99
12. Belfast	Competitors HHI Concentration	17 984 Unconcentrated	21 (+4) 899 (-85) Unconcentrated	19 (-2) 1126 (+227) Moderately	17 (-2) 1184 (+58) Moderately	17 (no change) 1052 (-132) Moderately	20 (+3)* 2805 (+1753) Extremely	29 (+9) 945 (-1860) Unconcentrated
13. Rockland	Competitors HHI Concentration	23 1321 Moderately	31 (+8) 1069 (-252) Moderately	25 (-6) 1061 (-8) Moderately	29 (+4) 1125 (+64) Moderately	29 (no change) 1111 (-24) Moderately	28 (-1) 1248 (+137) Moderately	29 (+1) 1263 (+15) Moderately
14. Midcoast	Competitors HHI Concentration	9 3680 Extremely	8 (-1) 4190 (+510) Extremely	6 (-2) 5548 (+1358) Extremely	9 (+3) 3627 (-1921) Extremely	11 (+2) 2090 (-1537) Highly	11 (no change) 2253 (+163) Highly	9 (-2) 2624 (+371) Extremely
15. Augusta	Competitors HHI Concentration	25 922 Unconcentrated	30 (+5) 714 (-208) Unconcentrated	30 (no change) 696 (-18) Unconcentrated	32 (+2) 775 (+79) Unconcentrated	30 (-2) 777 (+2) Unconcentrated	31 (+1) 755 (-22) Unconcentrated	31 (no change) 1489 (+734) Moderately
16. Waterville	Competitors HHI Concentration	14 1548 Moderately	14 (no change) 1370 (-178) Moderately	15 (+1) 1610 (+240) Moderately	11 (-4) 1539 (-71) Moderately	11 (no change) 1976 (+437) Highly	14 (+3) 1569 (-407) Moderately	13 (-1) 1837 (+268) Highly
17. Skowhegan	Competitors HHI Concentration	11 1618 Moderately	12 (+1) 1317 (-301) Moderately	12 (no change) 1187 (-130) Moderately	11 (-1) 1244 (+57) Moderately	15 (+4) 1226 (-18) Moderately	13 (-2) 1191 (-35) Moderately	15 (+2) 577 (-614) Unconcentrated
18. Jackman/Greenville	Competitors HHI Concentration	3 5531 Extremely	5 (+2) 3534 (-1997) Extremely	4 (-1) 3273 (-261) Extremely	7 (+3) 2134 (-1139) Highly	7 (no change) 2058 (-76) Highly	5 (-2) 4786 (+2728) Extremely	3 (-2) 5694 (+908) Extremely
19. Farmington	Competitors HHI Concentration	12 2257 Highly	11 (-1) 2358 (+101) Highly	10 (-1) 2012 (-346) Highly	12 (+2) 1772 (-240) Moderately	13 (+1) 1877 (+105) Highly	12 (-1) 2290 (+413) Highly	12 (no change) 2221 (-69) Highly
20. Jay	Competitors HHI Concentration	5 3211 Extremely	4 (-1) 3368 (+157) Extremely	3 (-1) 3462 (+94) Extremely	6 (+3) 2789 (-673) Extremely	7 (+1) 3551 (+762) Extremely	7 (no change) 2749 (-802) Extremely	7 (no change) 2319 (-430) Highly
21. Lewiston/Auburn	Competitors HHI Concentration	14 1613 Moderately	18 (+4) 1517 (-96) Moderately	18 (no change) 1448 (-69) Moderately	17 (-1) 1789 (+341) Moderately	20 (+3) 1566 (-223) Moderately	20 (no change) 1481 (-85) Moderately	18 (-2) 2148 (+667) Highly
22. Bath/Brunswick	Competitors HHI Concentration	11 1921 Highly	10 (-1) 2169 (+248) Highly	9 (-1) 2081 (-88) Highly	8 (-1) 2846 (+765) Extremely	10 (+2) 1669 (-1177) Moderately	11 (+1) 1731 (+62) Moderately	11 (no change) 2130 (+399) Highly

HHO Market Area		6/1/92-5/31/93	6/1/93-5/31/94	6/1/94-5/31/95	6/1/95-5/31/96	6/1/96-5/31/97	6/1/97-5/31/98	6/1/98-5/31/99
23. Portland	Competitors HHI Concentration	32 1097 Moderately	38 (+6) 1168 (+71) Moderately	35 (-3) 1020 (-148) Moderately	62 (+27) 776 (-244) Unconcentrated	51 (-11) 972 (+196) Unconcentrated	76 (+25) 775 (-197) Unconcentrated	72 (-4) 714 (-61) Unconcentrated
24. Gray	Competitors HHI Concentration	19 1281 Moderately	15 (-4) 1572 (+291) Moderately	17 (+2) 1108 (-464) Moderately	14 (-3) 1172 (+64) Moderately	12 (-2) 1398 (+226) Moderately	10 (-2) 1493 (+95) Moderately	15 (+5) 1641 (+148) Moderately
25. South Paris	Competitors HHI Concentration	7 3706 Extremely	7 (no change) 4158 (+452) Extremely	8 (+1) 3361 (-797) Extremely	6 (-2) 3903 (+542) Extremely	7 (+1) 3989 (+86) Extremely	6 (-1) 3847 (-142) Extremely	5 (-1) 4170 (+323) Extremely
26. Rumford/Rangeley	Competitors HHI Concentration	7 1926 Highly	8 (+1) 1989 (+63) Highly	8 (no change) 2047 (+58) Highly	6 (-2) 2889 (+842) Extremely	6 (no change) 2690 (-199) Extremely	5 (-1) 3276 (+586) Extremely	6 (+1) 1250 (-2026) Moderately
27. Bethel	Competitors HHI Concentration	3 5634 Extremely	5 (+2) 4941 (-693) Extremely	4 (-1) 5000 (+59) Extremely	3 (-1) 5000 (no change) Extremely	5 (+2) 4038 (-962) Extremely	5 (no change) 3185 (-853) Extremely	4 (-1) 3308(+123) Extremely
28. Bridgton	Competitors HHI Concentration	7 2400 (estimate) Highly	7 (no change) 2689 (estimate) Extremely	8 (+1) 2443 (estimate) Highly	7 (-1) 5235 (estimate) Extremely	8 (+1) 2554 (estimate) Extremely	8 (no change) 2199 (-355) Highly	9 (+1) 2217 (+18) Highly
29. Limerick	Competitors HHI Concentration	7 2992 Extremely	7 (no change) 3085 (+93) Extremely	7 (no change) 2947 (-138) Extremely	7 (no change) 2273 (-674) Highly	6 (-1) 2776 (+503) Extremely	4 (-2) 2933 (+157) Extremely	6 (+2) 1979 (-954) Highly
30. Sanford	Competitors HHI Concentration	5 4000 (estimate) Extremely	6 (+1) 4392 (estimate) Extremely	5 (-1) 4576 (estimate) Extremely	4 (-1) 4313 (estimate) Extremely	5 (+1) 3829 (estimate) Extremely	6 (+1) 4233 (+404) Extremely	5 (-1) 3715 (-518) Extremely
31. Biddeford/Saco	Competitors HHI Concentration	17 1524 Moderately	21 (+4) 1323 (-201) Moderately	21 (no change) 1557 (+234) Moderately	20 (-1) 1025 (-532) Moderately	21 (+1) 1418 (+393) Moderately	22 (+1) 2499 (+1081) Highly	18 (-4) 1802 (-697) Highly
32. York	Competitors HHI Concentration	3 8000 (estimate) Extremely	6 (+3) 6855 (estimate) Extremely	6 (no change) 6380 (estimate) Extremely	9 (+3) 2146 (estimate) Highly	9 (no change) 2842 (estimate) Extremely	4 (-5) 7311 (estimate) Extremely	8 (+4) 2752 (-4559) Extremely
33. Mt. Desert	Competitors HHI Concentration	9 2762 Highly	8 (-1) 4084 (+1322) Highly	10 (+2) 4094 (+10) Extremely	12 (+2) 3352 (-742) Extremely	10 (-2) 2768 (-584) Extremely	8 (-2) 2478 (-290) Highly	10 (+2) 2789(+311) Extremely