

The Cci's Approach in the Oppo & Vivo Case Regarding Anti- Competition¹

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Abstract

This article examines the CCI's investigation into Oppo and Vivo for alleged anti-competitive practices in India's smartphone market.

1. INTRODUCTION

The Competition Commission of India (CCI), established under the Competition Act, 2002, serves as the regulatory watchdog tasked with fostering fair competition, curbing anti-competitive practices, and protecting consumer interests in India's dynamic markets. Among its numerous adjudications, the CCI's handling of cases involving Chinese smartphone giants OPPO and Vivo—both subsidiaries of the BBK Electronics conglomerate—offers critical insights into its approach toward allegations of anti-competitive agreements and abuse of dominance in the rapidly growing smartphone sector. These cases, namely **M/s K.C. Marketing v. OPPO Mobiles MU Private Limited**² and **M/s Karni Communication v. Vivo Companies**³, emerged from disputes between the companies and their respective distributors, spotlighting practices such as territorial restrictions, online sales curbs, and supply terminations.

In the OPPO case, K.C. Marketing, a Maharashtra-based distributor, accused OPPO of halting supplies, imposing online sales restrictions, and failing to clear dues, alleging violations under Section 3⁴ and Section 4⁵ of the Act. The CCI, however, dismissed the claims, finding OPPO non-dominant in the "smartphones in India" market (with a 10–13% share in 2017-2018) and its vertical restraints lacking an appreciable adverse effect on competition (AAEC). Similarly, in the Vivo case, Karni Communication alleged that Vivo imposed vertical restraints like RPM⁶, territorial limits, and penalties, alongside claims of cartel-like behavior via the AIMRA⁷. The CCI rejected these allegations, citing Vivo's lack of dominance (12.6% share in Q2 2018) and the absence of AAEC, given the competitive availability of Vivo products.

The CCI's approach in these cases reflects a broader regulatory philosophy: a high threshold for proving dominance, a pragmatic evaluation of vertical agreements, and an emphasis on market-wide competition over individual grievances. Both companies operate in India's smartphone market—a sector marked by

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³ ⁴ Decided on November 8, 2018

⁵ Decided on June 19, 2019

⁶ Anti-competitive agreements

⁷ Abuse of dominance

⁸ Resale Price Maintenance

⁹ All India Mobile Retailers Association

intense rivalry among brands like Samsung, Xiaomi, and Realme—where the CCI found no evidence of market foreclosure or consumer harm. Notably, the CCI resisted aggregating BBK Group’s market share (OPPO, Vivo, OnePlus) to establish dominance, requiring proof of direct control, which was absent. This conservative stance underscores its intent to balance business autonomy with competitive integrity, especially in a sector vital to India’s digital economy.

These rulings, while pre-dating more recent scrutiny of Chinese firms (e.g., tax evasion probes in 2022), remain pivotal for understanding the CCI’s framework as of March 23, 2025. They raise questions about the adequacy of its tools in addressing evolving market dynamics, such as e-commerce growth and conglomerate influence, while highlighting its evidence-driven, pro-competition ethos. This analysis explores the CCI’s methodology, its implications for stakeholders, and potential gaps in its regulatory approach, setting the stage for a deeper examination of its enforcement strategy.

1.2. OBJECTIVE

- To analyze the CCI’s methodology in assessing anti-competitive practices under Sections 3 and 4 in the OPPO and Vivo cases.
- To evaluate how the CCI defines market dominance and its implications for smartphone manufacturers.
- To examine the CCI’s treatment of vertical agreements and their impact on competition in the Indian smartphone market.
- To identify consistencies or shifts in the CCI’s regulatory approach toward foreign firms in a competitive sector.

1.3. SCOPE

- Focuses on the CCI’s decisions in *M/s K.C. Marketing v. OPPO* (2018) and *M/s Karni Communication v. Vivo* (2019).
- Covers allegations of anti-competitive agreements (Section 3) and abuse of dominance (Section 4).
- Analyzes the smartphone market in India as the relevant market, including competitive dynamics.
- Excludes post-2019 CCI actions or non-competition issues (e.g., tax evasion probes) unless explicitly linked.
- Considers the CCI’s approach as of March 23, 2025, based on available data.

1.4. HYPOTHESIS

- The CCI’s high threshold for proving dominance protects non-dominant firms like OPPO and Vivo from Section 4 liability.
- Vertical restraints imposed by OPPO and Vivo do not significantly disrupt competition due to the market’s competitiveness.
- The CCI’s reluctance to aggregate BBK Group’s market share limits its ability to address conglomerate influence.

1.5. RESEARCH QUESTIONS

- Does the CCI prioritize overall market competition over distributor-level disputes in these cases?
- Did the CCI find OPPO and Vivo dominant in the Indian smartphone market?
- Do vertical restrictions by OPPO and Vivo lead to an appreciable adverse effect on competition, per the CCI?

1.6. METHODOLOGY

This study relies on a qualitative analysis of the CCI's orders in the OPPO and Vivo cases, supplemented by market data and legal provisions under the Competition Act, 2002, to assess its regulatory approach and reasoning.

2. OVERALL MARKET COMPETITION OVER DISTRIBUTOR-LEVEL DISPUTES

2.1. FOCUS ON MARKET-WIDE COMPETITIVE DYNAMICS

In both the OPPO and Vivo cases, the CCI defined the relevant market as "smartphones in India," a broad and highly competitive sector featuring major players like Samsung, Xiaomi, Realme, and others. This wide market definition set the tone for its analysis, shifting attention from the micro-level disputes between the companies and their distributors to the macro-level health of the smartphone market.

OPPO Case: K.C. Marketing alleged that OPPO Mobiles MU Private Limited engaged in anti-competitive practices, including terminating supply, restricting online sales, and imposing territorial limits. While these claims highlighted a contractual dispute at the distributor level, the CCI evaluated their impact on the entire market. It noted that OPPO held a modest market share (10–13% in 2017-2018) and that its products remained widely available at competitive prices through online and offline channels. The CCI concluded that these practices did not disrupt the competitive landscape, emphasizing the presence of alternatives and the lack of market foreclosure over the distributor's specific losses.

Vivo Case: Karni Communication raised similar concerns against Vivo, including restrictions on online sales, territorial allocation, and penalties for market infiltration. The CCI again assessed these allegations in the context of the broader market, where Vivo's share (12.6% in Q2 2018, dropping to 9.7% by Q4 2018) was constrained by rivals. It found that Vivo products were freely accessible online and offline, and distributors faced no significant barriers to switching brands. The CCI's focus remained on whether competition as a whole was harmed, not on resolving the distributor's operational challenges.

In both instances, the CCI's lens was trained on market contestability and consumer access, sidelining the distributors' individual plights unless they demonstrably affected the competitive ecosystem.

2.1. APPLICATION OF SECTION 19(3)- APPRECIABLE ADVERSE EFFECT ON COMPETITION (AAEC)

The CCI's evaluation of anti-competitive agreements under Section 3(4) of the Competition Act hinges on whether such practices cause an "appreciable adverse effect on competition" (AAEC), as outlined in Section 19(3). This statutory tool underscores its priority on market-wide outcomes over localized disputes.

OPPO Case: The CCI analyzed vertical restraints (e.g., online sales restrictions, territorial limits) using Section 19(3) factors—such as barriers to entry, market foreclosure, and consumer harm. It found no AAEC because OPPO's restrictions did not limit consumer choice or exclude competitors; smartphones remained competitively priced and accessible. The distributor's grievance about supply termination was dismissed as a contractual issue, not a competition concern, unless it broadly impacted market dynamics—which it did not.

Vivo Case: Similarly, the CCI assessed Vivo's alleged vertical restraints (e.g., territorial allocation, RPM) and concluded they lacked AAEC. It noted that the primary distribution agreement was for offline sales, rendering online restrictions irrelevant, and that territorial limits did not prevent distributors from engaging with rival brands. The absence of consumer harm or significant competitive distortion outweighed Karni Communication's claims of penalties or sales curbs.

By anchoring its decisions in AAEC, the CCI effectively prioritized the structural integrity of the market over the distributors' operational or financial setbacks, reinforcing its competition-first stance.

2.2. DISMISSAL OF DOMINANCE AND DISTRIBUTOR-CENTRIC CLAIMS

The CCI's rejection of dominance claims under Section 4 further illustrates its focus on market competition rather than distributor disputes.

OPPO Case: K.C. Marketing argued that OPPO abused its alleged dominance by stopping supply and imposing restrictions. The CCI, however, found OPPO non-dominant (given its modest share and competitive pressures) and dismissed Section 4 allegations outright. This meant that distributor-level issues—like unpaid dues or supply halts—were not pursued as abuses unless they stemmed from market power, which OPPO lacked.

Vivo Case: Karni Communication's dominance claim against Vivo was similarly rejected, with the CCI citing Vivo's declining share and the market's competitiveness. Allegations of restrictive practices were not examined as abuses because Vivo could not dictate market terms, leaving distributor complaints unaddressed under this lens.

By requiring dominance as a prerequisite for Section 4 violations, the CCI avoided delving into distributor-level disputes unless they reflected broader market control—an threshold neither OPPO nor Vivo crossed.

2.3. EVIDENCE-BASED APPROACH OVER ALLEGATIONS

The CCI demanded concrete evidence of market harm, not just distributor dissatisfaction, further prioritizing competition over individual disputes.

OPPO Case: Allegations of overcharging or supply termination lacked substantiation beyond the distributorship agreement's terms. The CCI refused to infer anti-competitive intent or effect without proof of market-wide impact, effectively sidelining K.C. Marketing's narrative.

Vivo Case: Claims of resale price maintenance and penalties were dismissed due to insufficient evidence, with the CCI noting that competition persisted regardless of Karni Communication's experience. This evidence-driven stance ensured that only practices with demonstrable market consequences warranted intervention.

This approach underscores that distributor-level disputes, absent broader competitive harm, do not sway the CCI's rulings.

2.4. COUNTERPOINT CONSIDERATION

One might argue that the CCI could prioritize distributor disputes if it viewed them as symptomatic of systemic anti-competitive behavior. For instance, if OPPO's or Vivo's restrictions were shown to collectively disadvantage smaller distributors or stifle e-commerce growth, the CCI might have acted. However, in both cases, the availability of products through multiple channels and the presence of robust competition negated such concerns, aligning the CCI's focus with market health over individual grievances.

3. DOMINANCE IN SMART PHONE MARKET

The Competition Commission of India (CCI) did not find OPPO or Vivo to be dominant in the Indian smartphone market in its rulings on *M/s K.C. Marketing v. OPPO Mobiles MU Private Limited* (decided November 8, 2018) and *M/s Karni Communication v. Vivo Companies* (decided June 19, 2019). This conclusion stems from the CCI's rigorous assessment of dominance under Section 4 of the Competition Act, 2002, which requires a firm to hold a position of strength enabling it to operate independently of competitive forces or affect competitors and consumers in its favor. The CCI's analysis in both cases,

grounded in market share data, competitive constraints, and legal thresholds, consistently rejected claims of dominance.

3.1. MARKET SHARE ASSESSMENT

The CCI evaluated OPPO and Vivo's market shares in the "smartphones in India" market and found them insufficient to establish dominance, given the presence of multiple strong competitors.

OPPO CASE

Market Share: The CCI noted that OPPO held a market share of 10–13% in 2017- 2018, based on available industry data. While significant, this share was dwarfed by leading players like Samsung and Xiaomi, which collectively commanded larger portions of the market.

Context: The Indian smartphone market was characterized as highly competitive, with rapid shifts in rankings and no single player exerting unilateral control. OPPO's share, though notable, did not grant it the ability to dictate prices, supply, or market terms.

Finding: The CCI concluded that OPPO's market position did not meet the dominance threshold under Section 4, as it faced substantial competitive pressure from rivals.

VIVO CASE

Market Share: Vivo's market share was recorded at 12.6% in Q2 2018, declining to 9.7% by Q4 2018, reflecting a downward trend. Like OPPO, Vivo operated in a crowded field dominated by Samsung, Xiaomi, and emerging brands like Realme.

Context: The CCI highlighted Vivo's fluctuating share and inability to maintain a leading position, underscoring the market's dynamism and contestability.

Finding: Vivo's modest and declining share did not confer dominance, as it lacked the market power to influence competition independently.

In both cases, the CCI determined that neither OPPO nor Vivo held a share substantial enough to suggest dominance, especially when benchmarked against competitors with stronger or more stable positions.

3.2. COMPETITIVE CONSTRAINTS

The CCI emphasized the presence of robust competitors as a key factor negating dominance for OPPO and Vivo.

OPPO CASE

Competitors: The CCI identified Samsung, Xiaomi, and other brands (including Vivo and OnePlus) as significant players constraining OPPO's influence. Xiaomi, for instance, was a market leader during this period, leveraging aggressive pricing and online sales, while Samsung maintained a strong offline presence.

Impact: These rivals ensured that OPPO could not impose pricing or supply decisions without risking loss of market share. Consumers and distributors had ample alternatives, diluting OPPO's market power.

Finding: The CCI ruled that OPPO operated in a "highly competitive market," where competitive forces prevented it from acting independently of rivals or affecting the market disproportionately.

VIVO CASE

Competitors: Similar to OPPO, Vivo faced competition from Samsung, Xiaomi, Realme, and others. The CCI noted that these brands offered comparable products, often at lower prices or with better distribution networks, limiting Vivo's leverage.

Impact: Vivo's declining share (from 12.6% to 9.7% in 2018) underscored its vulnerability to competitive pressures, contradicting claims of dominance.

Finding: The CCI concluded that Vivo lacked the ability to control market dynamics, as competitors

effectively checked its influence.

The existence of these competitive constraints was pivotal in the CCI's determination that neither company held a dominant position.

3.3 REJECTION OF BBK GROUP AGGREGATION

In both cases, informants argued that OPPO and Vivo's dominance should be assessed by aggregating the market shares of the BBK Electronics conglomerate (OPPO, Vivo, OnePlus, and later Realme). The CCI rejected this approach, requiring evidence of unified control, which was absent.

OPPO CASE

Argument: K.C. Marketing suggested that BBK's combined share (potentially exceeding 20–25% when including Vivo and OnePlus) indicated dominance.

CCI Response: The CCI found no proof that BBK exercised centralized control over OPPO's operations or that OPPO's decisions were dictated by a group strategy. It treated OPPO as an independent entity, noting that market share alone, even if aggregated, does not establish dominance without evidence of coordinated dominance or control.

Finding: Absent such evidence, OPPO's standalone share (10–13%) was the basis for assessment, and dominance was not established.

VIVO CASE

Argument: Karni Communication similarly claimed that Vivo's dominance should reflect BBK's collective strength.

CCI Response: The CCI reiterated that Vivo operated independently, with distinct ownership and decision-making structures from other BBK brands. It dismissed aggregation due to lack of documentation or operational overlap proving BBK's dominance over Vivo.

Finding: Vivo's individual share (9.7–12.6%) was insufficient for dominance, and the CCI refused to infer group-level power without substantiation.

This conservative stance ensured that dominance was assessed at the firm level, not the conglomerate level, further supporting the "No" conclusion.

3.4. LEGAL THRESHOLD FOR DOMINANCE UNDER SECTION 4

Under Section 4, dominance requires a firm to have the ability to act independently of competitive forces or affect the market in its favor. The CCI applied this threshold strictly.

OPPO Case: The CCI found that OPPO could not unilaterally set prices, restrict supply, or exclude competitors, as its actions were shaped by market competition. Alleged abuses (e.g., supply termination) were thus irrelevant without dominance, which OPPO lacked.

Vivo Case: Similarly, Vivo's alleged restrictive practices (e.g., territorial limits) did not translate into market control, as competitors and consumer options constrained its influence. The CCI saw no evidence of Vivo affecting the market disproportionately.

In both cases, the CCI's high legal bar for dominance—beyond mere market share to actual market power—meant neither OPPO nor Vivo qualified, solidifying the "No" finding.

4. VERTICAL RESTRICTIONS BY OPPO AND VIVO

The Competition Commission of India (CCI) concluded that the vertical restrictions imposed by OPPO and Vivo in *M/s K.C. Marketing v. OPPO Mobiles MU Private Limited* (decided November 8, 2018) and *M/s Karni Communication v. Vivo Companies* (decided June 19, 2019) did not lead to an appreciable adverse effect on competition (AAEC) in the Indian smartphone market. This determination, made under

Section 3(4) of the Competition Act, 2002, reflects the CCI's assessment that these restrictions—such as online sales bans, territorial limits, and alleged resale price maintenance (RPM)—did not significantly disrupt market competition or harm consumers. The CCI's reasoning hinges on market accessibility, competitive dynamics, and a lack of substantiated evidence, as detailed below.

4.1. NATURE OF CERTICAL RESTRICTIONS AND CCI'S FRAMEWORK

Vertical restrictions under Section 3(4) include agreements between entities at different supply chain levels (e.g., manufacturer and distributor) that may restrict competition, such as exclusive distribution, territorial restrictions, or RPM. The CCI evaluates these for AAEC using Section 19(3) factors: market foreclosure, barriers to entry, consumer harm, and competitive innovation.

OPPO Case: K.C. Marketing alleged that OPPO imposed restrictions on online sales, limited sales to designated territories, and terminated supply, potentially stifling competition.

Vivo Case: Karni Communication claimed Vivo enforced online sales restrictions, territorial allocations, penalties for market infiltration, and RPM to control pricing and distribution.

The CCI assessed whether these practices caused AAEC, focusing on their market-wide impact rather than their effect on individual distributors.

4.2. AVAAILABILITY OF PRODUCTS AND LACK OF MARKET FORECLOSURE

The CCI found that OPPO and Vivo products remained widely available despite the restrictions, negating claims of market foreclosure or competitive harm.

OPPO CASE

Finding: The CCI noted that OPPO smartphones were accessible through multiple online and offline channels at competitive prices, even with restrictions on K.C. Marketing's online sales or territorial scope. E-commerce platforms and other distributors ensured broad market reach.

Analysis: Restrictions on one distributor did not limit overall supply or exclude competitors like Samsung or Xiaomi from the market. The CCI concluded that OPPO's practices did not foreclose the market, as alternative channels maintained competition.

Outcome: No AAEC, as the market remained open and contestable.

VIVO CASE

Finding: Vivo products were similarly available online (e.g., via e-commerce platforms) and offline through various retailers, despite restrictions on Karni Communication's online sales. The CCI emphasized that the primary agreement was for offline distribution, rendering online curbs irrelevant to broader access.

Analysis: The absence of supply constraints or exclusionary effects meant competitors and consumers faced no significant barriers. Other distributors and brands continued to operate freely.

Outcome: No AAEC, as product availability and competition persisted.

In both cases, the CCI prioritized evidence of market accessibility over the distributors' restricted operations, concluding that competition was not appreciably affected.

4.3. COMPETITIVE MARKET DYNAMICS

The highly competitive nature of the Indian smartphone market undermined claims that these restrictions harmed competition.

OPPO CASE

Context: OPPO operated in a market with strong players like Samsung, Xiaomi, and Vivo itself (market share 10–13% in 2017-2018). The CCI found that these rivals constrained OPPO's ability to leverage restrictions anti-competitively.

Reasoning: Territorial limits or online sales bans did not prevent consumers from choosing alternatives or competitors from distributing their products. The market's dynamism—marked by price wars and innovation—ensured that OPPO's restrictions had no lasting competitive impact.

Outcome: No AAEC, as competitive forces neutralized the restrictions' potential effects.

VIVO CASE

Context: Vivo's share (12.6% in Q2 2018, dropping to 9.7% by Q4 2018) reflected a competitive field with Xiaomi, Samsung, and Realme. The CCI highlighted that distributors could switch to other brands, and consumers had ample options.

Reasoning: Territorial allocations did not lock distributors into exclusivity with Vivo, and online availability offset any offline constraints. The market remained vibrant, with no evidence of Vivo's restrictions stifling rivals.

Outcome: No AAEC, as competition thrived despite the restrictions.

The CCI's focus on the market's overall competitiveness showed that vertical restrictions did not confer undue advantage or harm rival operations.

4.4. LACK OF EVIDENCE FOR ANTI-COMPETITIVE IMPACT

The CCI dismissed allegations of AAEC due to insufficient evidence that the restrictions caused tangible harm.

OPPO CASE

Evidence: K.C. Marketing failed to substantiate claims that online sales restrictions or territorial limits reduced competition. The CCI found no data showing higher prices, reduced consumer choice, or entry barriers for rivals.

Analysis: Without proof of market-wide effects—beyond the distributor's own operational challenges—the CCI saw no basis for AAEC. The restrictions appeared as standard business practices without broader consequences.

Outcome: No AAEC, due to lack of evidentiary support.

VIVO CASE

Evidence: Allegations of RPM and penalties lacked documentation or consistent patterns. The CCI noted that pricing remained competitive across channels, and penalties (if any) did not demonstrably affect market dynamics.

Analysis: The absence of concrete proof—e.g., higher consumer prices or excluded competitors—meant the restrictions did not rise to an anti-competitive level. The CCI refused to infer harm without substantiation.

Outcome: No AAEC, as evidence did not support the claims.

This evidence-driven approach ensured that only restrictions with proven market impact would be deemed anti-competitive, which was not the case here.

4.5. SECTION 19(3) FACTORS AND CONSUMER WELFARE

The CCI's application of Section 19(3) further reinforced its "No" finding by showing no harm to consumers or competition.

OPPO Case: No barriers to entry (new brands like Realme emerged), no consumer harm (prices remained competitive), and no stifling of innovation (market thrived).

Vivo Case: Low exit barriers for distributors (they could switch brands), no consumer detriment (wide availability), and no foreclosure (competitors unaffected).

These factors collectively indicated that the restrictions did not disrupt the market's pro-competitive

structure or consumer welfare, aligning with the CCI's conclusion.

5. CONCLUSION

The Competition Commission of India's (CCI) adjudication of the M/s K.C. Marketing v. OPPO Mobiles MU Private Limited (2018) and M/s Karni Communication v. Vivo Companies (2019) cases reveals a consistent and principled approach to addressing allegations of anti-competitive practices under the Competition Act, 2002. The CCI unequivocally prioritized overall market competition over distributor-level disputes, as evidenced by its focus on the broader "smartphones in India" market and its dismissal of individual grievances unless they demonstrably harmed competitive dynamics. This is reflected in its finding that vertical restrictions—such as online sales bans, territorial limits, and alleged resale price maintenance—imposed by OPPO and Vivo did not result in an appreciable adverse effect on competition (AAEC). The CCI's reasoning rested on the widespread availability of products, the highly competitive nature of the market, and a lack of substantiated evidence showing market foreclosure or consumer harm. Furthermore, the CCI did not find OPPO or Vivo dominant in the Indian smartphone market, rejecting claims of market power based on their modest shares (10–13% for OPPO, 9.7–12.6% for Vivo) and the presence of formidable rivals like Samsung and Xiaomi. It also declined to aggregate the BBK Group's market share absent proof of unified control, setting a high threshold for dominance under Section 4. This conservative stance underscores the CCI's commitment to an evidence-driven, competition-centric framework that tolerates business practices unless they clearly disrupt market functionality.

While this approach fosters a pro-competition environment and supports India's vibrant smartphone sector, it may undervalue long-term risks, such as the potential influence of conglomerates like BBK or the evolving role of e-commerce. As of March 23, 2025, these 2018 and 2019 rulings remain key benchmarks of the CCI's methodology, balancing regulatory restraint with market oversight. They affirm that, in the absence of dominance or significant AAEC, vertical restrictions by firms like OPPO and Vivo are deemed permissible, prioritizing market health over distributor interests.

6. REFERENCES

1. Competition Commission of India (CCI) Order – Case No. 51 of 2018: M/s K.C. Marketing v. OPPO Mobiles MU Private Limited, decided on November 8, 2018. Primary source detailing the CCI's findings on OPPO's alleged anti-competitive practices, market share, and lack of dominance or AAEC.
2. Competition Commission of India (CCI) Order – Case No. 02 of 2019: M/s Karni Communication v. Vivo Companies, decided on June 19, 2019. Primary source outlining the CCI's analysis of Vivo's vertical restrictions, market position, and dismissal of dominance and AAEC claims.
3. The Competition Act, 2002: Government of India. Legal framework governing the CCI's assessments, particularly Sections 3 (anti-competitive agreements), 4 (abuse of dominance), and 19(3) (AAEC factors).
4. Market Data References (Implicit): Industry reports on smartphone market shares in India (e.g., IDC, Counterpoint Research) for 2017–2019, as cited in CCI orders. Provided context for OPPO's 10–13% and Vivo's 9.7–12.6% shares, though specific reports are not directly quoted here.
5. General CCI Guidelines and Precedents: Available via CCI official website <https://www.cci.gov.in/>. Informed the understanding of the CCI's broader approach to market definition, dominance, and vertical restraints.