

# **APPEARANCE OF THE PRESIDENT OF THE NATIONAL MARKETS AND COMPETITION COMMISSION BEFORE THE ECONOMIC AFFAIRS AND DIGITAL TRANSFORMATION COMMISSION OF THE CONGRESS OF DEPUTIES**

*Madrid, March 24, 2021*

*4 pm – Ernest Lluch Room*

## **1. ACKNOWLEDGMENTS AND INTRODUCTION**

It is a pleasure for me to appear before this Commission and give an account of the CNMC's activity over the latest financial year, as is my legal obligation, but also to set out the basic outline of the draft Strategic Plan which establishes the priorities of this independent authority for the future, as well as its roadmap. This is, without a doubt, an excellent opportunity to listen to the members of this Commission and to take on board the comments that you, ladies and gentlemen, are kind enough to pass on to me.

Let me begin this speech by talking about the past, so that later I can focus on the future.

## **2. ASSESSMENT OF ACTIONS**

The year 2020 has also been an atypical year for the CNMC, marked by the difficulties common to all of us, resulting from the pandemic caused by COVID-19, but also by the new expectations created around the renewal of part of its Board, the Presidency and the Vice-Presidency. I must emphasise, as I will always do, the extraordinary dedication of all the CNMC units in continuing to carry out their functions as normally as possible.

Let me start with the specific actions developed in relation to the pandemic:

- A new protocol for inspections has been developed which outlines precise measures for protection against COVID-19.

- In March, we set up a special email inbox for complaints and queries related to the application of the competition rules in the context of the pandemic (covid.competencia@cnmc.es). We received more than 700 communications, including queries and complaints, in the four months it was operational and the vast majority were answered within a maximum of one week of being received.
- In fact, as a result of the complaints received, we have launched several investigations, the most notable of which are those affecting the financial sector (linking ICO loans to other products) and the insurance sector, where we have already had to open a disciplinary case concerning anti-competitive practices that came to light during the pandemic.
- Our Department for the Promotion of Competition has reported a record number of regulatory texts, many related to COVID-19 measures and associated effects, and has collaborated with other authorities, for example on issues such as the price of PPE masks. It has also prepared and approved the seventh annual report on state aid in Spain, with a focus on aid implemented in the context of the Pandemic.
- In the telecommunications area, in addition to noting the excellent performance of our infrastructures and services, in contrast to other countries, due to the previous regulatory environment, extraordinary measures were taken to guarantee the continuity of the service at such a delicate time, for example with regard to portability. And, of course, the audiovisual sub-directorate has continued to monitor the content broadcast.
- The Energy Directorate worked in constant cooperation with the Ministry for the Ecological Transition and the Demographic Challenge to help stakeholders interpret the measures adopted during the state of emergency and continued to process the payment and toll circulars despite the suspension of the proceedings.

- For its part, the Directorate for Transport and the Postal Sector swiftly adopted decisions on the supervision and reduction of railway charges to mitigate the effects of the pandemic, as well as on the quality of the universal postal service.

Apart from these specific actions, as I said, the CNMC has continued to carry out its activity relatively normally. I will only offer some provisional figures (since the 2020 report is not yet closed):

As far as **competition advocacy** is concerned, in 2020:

- We initiated 12 sanctioning proceedings for conduct restricting competition, the highest number since 2014.
- The Economic Intelligence Unit has enabled us to initiate the highest number of investigations since its creation, including the first case initiated based on the use of algorithms to detect unlawful conduct (agreements on commissions in the real estate sector), as well as inspections (chemical sector) and several resolutions (weather radar, resolved by the CNMC).
- In terms of merger control, although 2020 was marked by the pandemic and the suspension of proceedings for several months, we still analysed a good number of transactions (70 notifications), of which three were analysed in the second phase (CIMSА/СЕМЕХ, SANTA LUCÍA/FUNESPAÑA and MOORING/PORT SERVICES) and four others were authorised in the first phase with commitments.

As for **competition advocacy**, last year:

- We challenged, as provided for in Article 5.4 of the LСNMC, two regulations restricting competition in the field of urban and interurban passenger transport in relation to vehicles for hire (the

obligation to provide prior notification of journeys to a registry and the ban on trading in vehicles for hire licences).

- We reported on 23 regulatory projects, including 4 draft bills. As I said, a record number.
- We also published studies on urban water supply and sanitation services, on air ticket price reductions in non-peninsular regions, and a report on passenger transport tenders in the school, work and health sectors, all of which contain recommendations for improvement for the public administrations.
- We also approved the first update of the guide on public procurement and competition, focusing on public procurement planning.

With regard to the actions carried out within the scope of the **Market Unity Guarantee Act**, this unit has worked on recommendations relating to the regulatory environment in various sectors. Specifically, it has issued 14 reports in defence of the rights and interests of economic operators (Art. 26); 12 reports in relation to mechanisms for removing obstacles or barriers detected by economic operators, consumers and users (Art. 28); and there have been 16 decisions in relation to whether or not to challenge cases in defence of market unity in accordance with Article 27 of the Market Unity Guarantee Act. For example, we challenged an article contained in the Land Transport Regulation Act that required at least one vehicle to be less than 5 months old in order to obtain an authorisation for public goods transport, as in practice, this (unjustified) requirement restricted access to this activity in favour of those already operating. We were successful in having it annulled by the Supreme Court.

In the **telecommunications area**, I would highlight the important public consultations related to the wholesale broadband access markets for the residential and business segment (Market 3 and Market 4). Competition in these markets is crucial to encourage fibre network roll-outs in Spain. In addition, two other important public consultations were launched last year to ascertain the

costs of the largest operators and the prices of Telefónica's Framework offer for access to certain infrastructure.

Finally, and of great import for the near future, also in 2020 we approved the Report on the Preliminary Draft of the new General Telecommunications Act, which transposes the 2018 European Electronic Communications Code into Spanish law.

In the **audiovisual field**, the CNMC carries out control and monitoring work. A noteworthy aspect of this work is the systematic analysis of the broadcasts made by 120 television channels. As for the future, we are preparing for the imminent regulation of audiovisual communication services based on video-sharing platforms (*influencers*).

In the **area of energy**, the CNMC has continued to develop, through Circulars, the new competences attributed to us in the gas and electricity markets following the transposition of Community Directives, which are of major importance, as they relate to the economic regime of regulated activities that account for a volume of 18,000 million euros per year.

The Circulars with the greatest impact relate to the methods for calculating electricity transmission and distribution tolls, as well as natural gas tolls. Objective and transparent rules have been introduced to ensure that toll structures are based on efficiency and non-discrimination criteria. I would also like to highlight the Circular on the natural gas distribution payments and the Circular on natural gas assessment, the purpose of which is to guarantee the efficient operation of basic underground storage facilities, regasification plants and the gas pipeline transmission network.

Finally, the CNMC has been involved in implementing a number of European guidelines on the operation of the electricity system, which will allow consumers to be more involved, promote new forms of electricity storage and reinforce the long-term security of the electricity system.

In the **postal sector**, where we hold special responsibility for the universal postal service and the actions of Correos, in 2020 we sanctioned this state-owned

company for failing to comply with the delivery times required by postal regulations for ordinary letters and basic parcels; and we also reported on the draft Plan for the provision of the universal postal service proposed by the Ministry of Transport, suggesting improvements to the calculation for the annual compensation that corresponds to Correos.

Beyond this regulated area, at the CNMC we have extended the analysis of the postal sector to the **activity of e-commerce platforms**, and in the Resolution on Amazon we have established that the management and distribution activity of products purchased via e-commerce is of a postal nature and, therefore, must have the corresponding authorisation.

In the **rail sector**, in 2020 we supervised the allocation of 10-year capacity to new entrants and also to the incumbent operator, Renfe Viajeros, ensuring that this process was competitive, transparent, objective and non-discriminatory.

Following the start of the commercial services liberalisation, we have been working to ensure that all operators have access to the services they need in accordance with the regulations and, in this respect, we have recently ruled that Renfe Mantenimiento's prices must be adjusted to adequately reflect its real costs.

In the **airport sector**, we continue to ensure that the tariffs applied by AENA to airlines strictly comply with the principles of good regulation required by the airport planning and regulation document, DORA (Documento de Ordenación y Regulación Aeroportuaria). At such a complicated time for the sector, we at the CNMC resolved that the tariffs would not increase in 2021 and we are also analysing the tariffs for the coming years, as the lack of certainty over the recovery of traffic is compounded by the pass-on of COVID-19 operating costs to airport charges.

I must point out that it would not be possible to carry out these CNMC actions effectively in the markets without the support of **horizontal services** that deal with aspects such as **communication policy, economic-financial issues, asset and personnel management, IT systems and the digitalisation of our tasks, internal control and legal and economic support for the different**

**units.** In these times of the pandemic and remote work, the support of all these services has been particularly valuable and excellent.

And so, after this quick review of our activity in 2020, I now turn to the future, firstly through the strategic lines that will mark the next 6 years of the CNMC and other more specific shorter-term actions.

### **3. STRATEGIC PLAN**

The current **complex and unprecedented** situation also offers immense operational opportunities for improving our environment and strengthening the country's economic future. The **recovery** of national and global economic activity will take place in **markets other than the traditional ones** due to the impact of the digital economy. To this we must add a corporate and institutional climate of **economic, environmental and social sustainability.**

In this context of digitalisation, ecological transition and rapid business evolution, a well-oiled machine such as the CNMC, which pursues consumer welfare and the good health of the national economic fabric, can be decisive in achieving ambitious goals.

Over the next six years, the CNMC aspires to consolidate a robust culture of competition in Spain, close to the public and linked to a proportionate and comprehensive regulatory model that protects good competitive practices and offers a high level of legal certainty.

One of our greatest challenges will be to adapt and anticipate the new rules of the game. Our organisation must anticipate the risks to effective competition in sectors that are constantly evolving technologically, while at the same time encouraging innovative activity that benefits consumers. In this respect, we have already outlined our vision in recent months through written contributions to European legislative processes such as the *New Competition Tool* (which later became the *Digital Markets Act*), the *Digital Services Act* and the *Green Deal*.

To this end, we have devised a strategic plan in which, if you will indulge the simile of a Greek temple, consumer welfare generated by competitive, innovative and liberalised markets would occupy the frontispiece, supported by three pillars: the internal, the institutional and the international. At its base, running through the entire structure of the building, is the consolidation of the culture of competition and good regulatory practices.

#### **a. Internal pillar**

In terms of the internal pillar, I would first like to highlight a key issue: **functional autonomy**. We believe that the CNMC will only fully achieve the objectives entrusted to it by efficiently managing its resources, and this requires true autonomy in the budgetary, employment and organisational spheres.

Without ever renouncing the highest standards of transparency and auditing, we need to have the necessary autonomy in terms of **staff recruitment, promotion and retention**, as well as the real power to adapt the organisational and functional structure of the institute to the priorities required to achieve the objectives set. For example, recognising the Economic Intelligence Unit as a sub-directorate and being able to recruit suitable professionals to perform its functions, such as *data scientists*, mathematicians, physicists, sociologists, and so on. As you are aware from my previous appearance before this Congressional Commission, we do not yet have this essential autonomy of which I speak, but I am determined to do everything in my power to move in this direction and, in this regard, I would like to ask for your help.

This idea, in turn, leads me, of course, to talk about the **new way of working** that we will implement at the CNMC as soon as it is possible to return to our offices. Our vision includes a concept of **goal-based** performance, where attendance is not a determining factor.

We are also committed to **cross-cutting work**. We believe in **cooperation and coordination between the CNMC's different directorates and departments**, exchanging knowledge, and setting up multidisciplinary working groups that generate synergies and contribute creativity and value to the process of obtaining results. There are currently four such groups in the CNMC, made up of people



from different units, and the experience is notable for the quality of their achievements. I am referring to the working groups on the digital economy, competence and sustainability, energy and innovation, and rail liberalisation.

Within this approach, it is our aim to ensure that both **economic and legal services** have the necessary means to consolidate their role as cross-cutting units, with a view to achieving greater levels of robustness and internal coherence in analysis methodology.

We are also involved in a rigorous process of **ex post evaluation of the impact** of all our actions, not only in the areas of promotion and competition advocacy, but also in the regulatory part of our activity.

Finally, we are committed to implementing the **sustainable development goals of the 2030 Agenda** and **digitalisation** in all our decisions, identifying in the development of our mandate the areas of action that contribute to achieving these goals, with a clear focus on the **ecological transition**.

Having said this, I would also like to make a few brief notes on the basic strategic lines of the CNMC's different areas of supervision and regulation:

### **Competition Advocacy**

- With regard to the CNMC's competition advocacy, the most significant changes will come from the transposition of the ECN+ Directive, without forgetting, of course, other initiatives that may emerge from the EU, such as the aforementioned *Digital Markets Act* and *Digital Services Act*, or the *Green Deal*, as they materialise, as well as the imminent review of the regulations relating to competition restrictions in vertical relationships and the framework for analysing these restrictions in horizontal relationships.
- It is also important to make progress on the CNMC's **compliance policy**, which has a high informative value for the business community.
- And finally, in this area, the CNMC will be particularly vigilant in **sectors where competition may be weakened by structural or circumstantial**

**conditions**, as has occurred during the current health crisis in sectors such as pharmaceuticals, insurance companies, funeral services and finance; in addition, the detection of anti-competitive practices **in the field of public procurement** will remain a priority. In both areas, the Economic Intelligence Unit will continue to further explore the use of advanced data analysis techniques aimed at detecting these malpractices.

### **Promotion of Competition**

- In the area of Promotion, we will push to **improve the quality of regulation and the effectiveness of public intervention** in markets, focusing our efforts on removing unnecessary obstacles and barriers. We cannot allow this type of bottleneck to hamper recovery, productivity or innovation.
- In this area, we will seek a **decisive collaboration with civil society and public authorities**. We will promote public consultations, guidance documents and improved access to the CNMC's statistical information. We will also implement mechanisms for collaborating with academia, consumers, the business sector and the authorities.
- Likewise, with full respect for regional powers, we will intensify our efforts related to promoting regulatory quality related to **market unity**, to guarantee that all Spanish consumers have **access to any product on equal terms** and that companies can develop their offers without unjustified or disproportionate charges and restrictions.

### **Energy**

- In the field of energy, we will continue to ensure the protection and rights of consumers. Our goal is to anticipate and facilitate, through regulation, the challenges posed by the different **innovative business models based on decarbonisation** in order to contribute to a secure and competitive energy system.

- We want to place energy consumers at the heart of all the CNMC's tasks. This is a priority from the market supervision, regulation and promotion of competition perspectives, in order to **achieve competitive prices without compromising quality and supply security**.
- To this end, we will favour the **active role of the consumer**, guaranteeing their access to sustainable energy options, and promoting and supervising **self-consumption** and instruments such as **renewable energy certification**, while protecting consumers' rights.
- On the other hand, we will **promote innovation in electricity and gas network activities**, including efficient investments in these networks to integrate renewable energies, as well as the **entry of new services-agents** into the energy markets (aggregators, electric vehicles, energy communities, etc.).
- At the macro level, we will also tackle the **integration of European energy markets**; and finally, within the current context of decarbonisation, especially in industrial processes and mobility, we will analyse the introduction of renewable gases.

### **Telecommunications and audio-visuals**

- In this area, we will help the **digital transformation** for the **benefit of consumers**, fostering competitive markets and establishing appropriate mechanisms to achieve **full connectivity**, while monitoring **new digital markets** and analysing **the impact of digitalisation**.
- In this regard, the forthcoming transposition of the **European Electronic Communications Code**, which I have already mentioned, will introduce several new features into Spanish law, such as the **definition and supervision of new operators that provide services over the Internet** (*over the top* or "OTT") alongside traditional operators, **new instruments for regulating high-speed electronic communications networks and**

**the infrastructures** that will support their roll-out, and a **reinforcement of end-users' rights** regarding electronic communications services. Through regulation and associated functions (for example, conflict resolution and disclosure of practices), the CNMC will contribute to the digital transformation, thereby promoting competition.

- We will also strengthen the **protection for electronic communications users** in the digital environment, ensuring on the one hand that it is transparent, reliable and secure for the end consumer, and on the other hand, that the benefits derived from European regulations are implemented.
- In the **audiovisual** field, the CNMC will ensure that, in the current context (with new providers and new consumption patterns), consumer and user confidence is promoted and their rights are respected: encouraging **diverse and reliable audiovisual content** and promoting **accessibility** to audiovisual content for people with disabilities.

### **Transport and Postal Sector**

- With regard to railway infrastructure and airport and postal sector tariffs, we will continue to implement tools to supervise the **conditions of access** to these infrastructures and the **correct functioning of the markets**.
- As in the energy, telecommunications and audiovisual markets, our directive is to **make the consumer the key focus** of the CNMC's regulatory and supervisory actions.
- In the **postal sector**, we will analyse the general conditions for the provision of services to users and the effective fulfilment of their rights by **traditional operators as well as new entrants in the postal sector**, in line with current national and EU legislation.
- In terms of rail transport, we are at a crucial point in time, in the midst of liberalisation and considering the decisive role that **rail transport**, once

commercial passenger and goods services have been liberalised, will play in the future ecological transition. For this it will be essential that **access to the network and other rail facilities** is **unrestricted** and efficient, and multimodality systems must be facilitated between different types of transport, in line with the European *Green Deal*. This context therefore generates numerous unknowns that the CNMC is working on.

- With regard to **airport tariffs**, we will ensure that their regulation adequately incorporates the **serious effects of the pandemic** on air traffic and that the design of the next airport planning and regulation document, **DORA**, takes advantage of the experience gained in applying the current regulatory framework (DORA 2017-2021).

#### **b. Institutional pillar**

- At the institutional level, our goal is to develop and promote the collaborative relationships necessary to exercise our functions, but also those that **reinforce the CNMC's legitimacy** and foster a true culture of competition in our country.
- For this reason, my **first institutional meeting** was held with **the Council of Consumers and Users**; the **first public event** of the CNMC under my mandate hosted the **Minister of Consumer Affairs** to present the energy offers comparison tool; and one of the first activities we scheduled in 2021, when the pandemic was easing slightly, was **to receive members of this Congressional Commission at our offices**.
- We want strengthen the **collaboration between the CNMC and business organisations**. We both aim to promote the market economy and free enterprise, market unity, sustainable economic development, and the development of research and technological innovation in business, so transparent and fluid formulas for collaboration, training and dissemination will always be on the table.

- Naturally, we understand that **coordination and collaboration** with **other regulators**, such as the **Bank of Spain**, the **CNMV**, **AIREF** and **AEPD**, is also essential. In fact, we recently signed an agreement with the CNMV to share our offices in Barcelona, and with the Bank of Spain we collaborate de facto on a number of initiatives, including digitalisation, data and research services. These synergies make the use of public resources more efficient and are in the general interest.
- With absolute respect for judicial independence and the judicial function, we must also strengthen ties with the **judges**, with whom we undoubtedly **share a connection when it comes to defending competition law** in our country and, of course, with the **competition authorities of the autonomous communities**, with whom we coordinate on a daily basis and with whom we can develop specific, mutually enriching collaboration projects.
- I am not forgetting, of course, the **universities**, which are the cornerstone for establishing a true culture of competition in Spain and training the best future professionals.

### **c. International pillar**

- And of course, **international cooperation**, which is more relevant today than ever, in a working environment in which the challenges are global in nature and many of the market scenarios lack defined borders.
- One of our objectives is to maintain a **proactive and dynamic** profile in all the international forums in which we participate: The CNMC is involved in major global, European, Ibero-American and Mediterranean bodies in the field of competition and regulation, to which we devote significant human and material resources.
- Of this active participation, examples of which can be found in the extensive version of my appearance that we have sent you, I can give you,

ladies and gentlemen, more details in the questions so as not to take up too much time here.

- The **European Union** is a clear example of the benefits of cooperation in competition and regulation. In the area of competition, we will continue to participate actively in the **European Competition Network (ECN)**, attending the various committees, working groups, expert meetings and participating actively in the most topical debates, such as the negotiations on the regulation of digital markets to ensure new legislation that is coordinated and consistent with the actions and responsibilities of the national competition authorities. And we are already beginning to prepare for Competition Day in the context of Spain's upcoming presidency of the Council of the EU in the second half of 2023.
- Furthermore, in the field of competition policy, we maintain ongoing bilateral relations with the competition authorities of our neighbouring countries (Portugal, France, Italy, Morocco) and have a special relationship for exchanging experiences and knowledge with those of Germany and the United Kingdom (despite Brexit).
- In terms of telecommunications, audiovisual, energy, postal and transport regulation in Europe, we will maintain an active presence in the various European regulators<sup>1</sup>, in some cases applying to lead certain projects and holding the **European Gas Regulation Forum** at the CNMC's premises in Madrid.
- **Beyond the borders of the EU**, we will maintain our active engagement in international forums such as the Organisation for Economic Co-operation and Development (**OECD**); the *International Competition Network (ICN)*; making written contributions and participating in interventions, presentations and working groups; UNCTAD, the Central

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<sup>1</sup>Body of European Regulators for Electronic Communications (BEREC), European Regulators Group for Audiovisual Media Services (ERGA), Agency for the Cooperation of Energy Regulators (ACER), Council of European Energy Regulators (CEER), European Regulators Group for Postal Service (ERGP) and IRG Rail.

American Competition Forum, the Latin American and Caribbean Competition Forum, and so forth. The CNMC is also the driving force behind the Ibero-American Competition School, a meeting point between all the Ibero-American competition authorities and the CNMC.

- In **regulatory matters**, we will continue to participate in the OECD's Network of Economic Regulators (**NER**) meetings, which promote dialogue on cross-cutting issues between more than 70 regulators from around the world operating in different sectors such as communications, energy, transport and water; and we will continue to work in the **MEDREG** (Mediterranean area) and **ARIAE** (Latin America).

#### **d. Consolidating a culture of competition and good regulatory practices**

- In this way, we have reached the natural culmination of the organisation's strategic points, which comprise the **consolidation of a culture of competition and good regulatory practices in Spain**.
- In support of this, we have devised a new communication strategy capable of communicating effectively with all stakeholders, whether citizens, companies or institutions, bringing the CNMC closer to the general public and clearly setting out our objectives and **the benefits for consumers and users**; for the general interest.
- Because the CNMC's activity **must reach everyone, the general public and businesses**, and be particularly accessible to those who do not seek us out, but who actually need us.
- This is a permanent objective that stems from our **public service vocation**; from our nature as public servants.
- The CNMC must be perceived for what it is: **a transparent, useful and prestigious institution**.



- I would like to conclude this presentation with a quick snapshot that depicts the value of the CNMC's activity for the Spanish economy and society:
  - In the field of competition alone, in 2019 we generated **savings of 1 billion euros by breaking up cartels and dismantling collusive agreements**, as well as by intervening in merger cases. I am talking about collusive practices that generally hit the most disadvantaged groups the hardest. For example, in 2016 we sanctioned manufacturers of adult adult incontinence pads who had fraudulently agreed to double the prices charged in pharmacies for their products and, without moving any further afield, we have recently sanctioned pharmaceutical companies that manufacture radiopharmaceuticals (drugs to treat cancer patients), which had fraudulently shared contracts and generated non-competition pacts. You can imagine how this cartel has affected public and private hospitals, as well as, indirectly, their patients.
  - In telecommunications, to give just one example among many, in the mobile telephone market, our regulation has driven an **average drop in retail prices of more than 85%, and has also boosted access to broadband services**, making Spain one of the European leaders in terms of coverage and take-up of next-generation networks. Nor can we forget the benefits we enjoy in Spain in terms of portability (which we pioneered when we introduced it in 2000).
  - With regard to energy, on aggregate, in the electricity and gas sectors, the reduction in tolls and fees paid by consumers for the payment of transmission and distribution facilities, established in accordance with the methods approved by the CNMC in its Circulars, will result in **annual savings of between 500 and 700 million euros**, each year, between 2021 and 2026. These figures do not take into account other savings, such as the estimated 550 million euros stemming from electricity usage time bands or the 120

million euros of savings resulting from the detection of non-competitive behaviour in the wholesale market. In addition, we manage approximately 18 billion euros from the settlement of regulated activities in the electricity sector.

- Finally, in the transport and postal sector, the CNMC's decisions result in savings of between 45 and 55 million euros per year, thanks to decisions on railway charges, and around 30 million euros in the airport sector from decisions on tariffs.

In the development of these strategic lines, we have planned almost **200 specific actions**. We have provided you with the **Action Plan**, which sets them out in detail, along with a document containing our **priority objectives**. Of course, I will once again be delighted to clarify any aspects that you consider appropriate, and to receive your suggestions, in this appearance, after which we will proceed to finalise the two documents for their definitive approval.

We have an immense amount of work ahead of us in a number of complex areas that are essential to the health of our economy, and the opinions, advice and assistance of public representatives will always be welcome at the CNMC. For my part, I can assure you that my commitment to the objectives I have set out for you is tenacious and tireless, but also enthusiastic.

Thank you very much.