

Mr. Anthony Wing
General Manager
Transport and General Practices Oversight
ACCC
GPO Box 520
MELBOURNE VIC 3001
VIA e-mail: transport@acc.gov.au

RE: ACCC Draft Decision on CBH Port Terminal Services Access Undertaking

Dear Mr. Wing,

Louis Dreyfus Commodities Australia Pty, Ltd supports ACCC's findings in its August 23rd Draft Decision on the CBH Port Terminal Services Access Undertaking Application.

In particular, we agree with ACCC's findings that the proposed Base Load Capacity (BLC) program did not offer gains in efficiencies that outweighed its shortcomings. We believe that ACCC used the correct criteria of open access, transparency of pricing, and flexibility in judging the merit of the BLC proposal. Further, ACCC affirmed that price should be the primary determinant in assigning capacity in times of excess demand.

The CBH auction based capacity allocation system has proved to be a method of capacity allocation that meets all of the major criteria for fairness in capacity allocation and support the Amended Access Undertaking excluding the BLC proposal.

Best regards,
Philip Coffin
General Manager, Grains
Louis Dreyfus Commodities Australia Pty Ltd