

We are a leading software company in Retail POS for over 35 years. As it is an experienced supplier of Point of Sale Systems as well as individual point of sale systems and point of sale equipment and loyalty software for a wide range of business environments. In particular, we service small to medium-size businesses (SMB). Our systems are widely in use throughout Australia and are found in newsagencies, restaurants, pet shops and pharmacies.

So we wish to note our concerns with some of the proposals in the draft report.

Although we see many positives in this report, we do see some negatives in particular is that SMB can often not justify the cost of the added burden with its benefits that it appears you are asking for:-

In particular, these are our concerns.

1. If the organisation has a website, we feel that its website would be an ideal spot to put its program's terms and conditions, plus a dated sheet of amendments to the program would be ideal. This, however, would be very hard for an SMB which does not have a website.

What we would suggest is that an organisation like VECCI write up a standard set of conditions and terms and an SMB would simply say that its loyalty program is conducted by this standard with their following conditions.

This would also get over the high cost of SMB in making and maintaining such a standard that is legal and at the same time is easy to access, visible, easy to read and uses simple language.

2. With SMB, a common issue is that over time it may be impossible to verify whether the points being claimed by the client are valid. The computer systems may have changed many times. Plus if the business changes have changed hands, the points collected may be impossible to verify. This opens up a problem with fraud which we have seen.

3. For an SMB, it's a big ask often to justify printing VIP cards. Plus many customers because they do not use it much will tend to be reluctant to carry it around as such it makes sense for these SMS to use an existing card that the public does carry with them like customers' payment cards.

As such we feel that some of these proposals do appear to present a risk of reducing competition and will result in an increased market consolidation by larger companies at the expense of SMB. If you have any queries or wish us to discuss this or any matter on this subject please contact us using the details below and please, we would like to be informed of the progress of the application.

Kind regards

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