

Australian Dental Association

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13 April 2018

Mr David Hatfield
Director
Adjudication Branch
Australian Competition and Consumer Commission
GPO Box 3131
Canberra ACT 2601

By email:

Dear Mr Hatfield,

RE: Without prejudice - Request for five year term approval period for Hospitals Contribution Fund of Australia Limited (HCF) application for authorisation AA1000402

Thank you for providing the Australian Dental Association (ADA) with the opportunity to participate in the pre-decision conference on Tuesday 10 April to further discuss with the Australian Competition and Consumer Commission's (ACCC) the dental profession's concerns about the Draft Determination on Hospitals Contribution Fund of Australia Limited's (HCF) application seeking authorisation (AA1000402 – referred to as the Application).

Request for five year authorisation term

While the ADA urges the ACCC's final determination to reject HCF's Application, it asks the ACCC to consider, were it to approve the Application, to only do so for a five year period rather than the 10 requested by HCF. The ADA makes this without prejudice to its previous submissions and the points it has raised at the pre-decision conference.

The considerable changes in the private health insurance market, such as the privatisation of Medibank and the announced merger of HCF and HBF; including the array of concerning industry practices that impact on consumers as well as the dental services market raised by the ADA's submissions and at the pre decision conference, means that it is prudent for the ACCC to approve HCF's application for only a five year period. Doing this would provide the ACCC and the public the opportunity to scrutinise whether HCF's proposed conduct in practice has given rise to more public detriments than benefits.

For further details, please contact Damian Mitsch at ceo@ada.org.au or 02 8815 3333.

Yours sincerely

A handwritten signature in black ink, appearing to read 'H Sachs', is written over a white background.

Dr Hugo Sachs
President
Australian Dental Association