



28 November 2017

Hannah Ransom  
Adjudication Branch  
Australian Competition and Consumer Commission  
23 Marcus Clarke Street  
Canberra ACT 2601

Via email: adjudication@accc.gov.au

Dear Ms Ransom

**Re: Request for submissions: Hospitals Contribution Fund of Australia Limited (HCF) application for authorisation AA1000402**

Thank you for the opportunity for Bupa HI Pty Ltd (**Bupa**) to provide a submission in response to HCF's authorisation request to open its own dental clinics in locations that may overlap with dentists who participate in HCF's More For Teeth program (**Authorisation Application**).

Bupa supports HCF's Authorisation Application. Bupa considers HCF's proposal to be pro-competition and beneficial to consumers.

Bupa considers that preferred provider arrangements such as HCF's More For Teeth program (**MFT program**) not only promote competition within the industries in which they operate but also provide consumers with an increased ability to make informed decisions and choices regarding their health costs. The ability to identify and manage health costs in advance assists consumers with the affordability of their health treatments by enabling choices to be made based on individual circumstances as to how to achieve the best value from their health insurance policy.

Bupa understands that MFT program providers are free to charge less than the maximum prices set by HCF for set services. This helps ensure consumers achieve the benefits of price certainty in terms of the maximum they will be charged for these services, without preventing these providers from competing further by charging less for these services or offering additional benefits to consumers.

Bupa also understands that like many other preferred provider arrangements there is no compulsion for non HCF providers to be part of the MFT program. Accordingly, services providers have the ability to choose either to participate in the MFT preferred provider arrangement and/or in a competing preferred provider arrangement offered by another health insurer. Alternatively, the service providers may choose to compete by offering their own independent packages or promotions to consumers. Bupa's view is that it is under such market conditions that consumers benefit from strong competition.

If you have any questions or would like any further information, please contact me on 03 9937 4840 or by email at Dwayne.crombie@bupa.com.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read "D Crombie", is written over a light blue circular stamp.

**Dwayne Crombie**  
Managing Director – Bupa HI Pty Ltd