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21 December 2001

Mr Tim Grimwade
Acting General Manager
Adjudication Branch
Australian Competition & Consumer Commission
PO Box 1199
Dickson ACT 2602

Dear Mr Grimwade

## Application for Authorisation Nos A90811 & A90812 lodged by Health Purchasing Victoria

I refer to your letter dated 14 December 2001 relating to the above applications for authorisation and in particular the request by Health Purchasing Victoria for an in interim authorisation for its applications.

The Recruitment and Consulting Services Association is opposed to the granting of an interim authorisation for the applications on the basis that all interested parties should have the opportunity and time to consider other options, rather than there be an acceptance of the arrangements proposed in the application for authorisations and that the granting of an interim authorisation to proceed with the proposed tender process would pre-empt the exploration of other possible options by the affected parties.

The implementation of the proposed tender process, which is conditional on final authorisation being granted by the Commission, has the potential to create confusion, uncertainty and additional administrative costs for the health care sector.

The granting of interim authorisation is not in the public's best interest because it will not increase the availability of nursing hours or reduce public spending on agency staffing. Furthermore, interim authorisation would do irreparable damage to the Nursing Agency market place as there would be a shift in nurses moving from one agency to another during such a period of speculation as this would produce.

For the above reasons, we are opposed to the granting of an interim authorisation for the above applications.

Yours sincerely

Brian/Morison Executive Officer – RCSA Vic/Tas Region CONSUMER COMMISSION
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