

N 90958

ABN 67 053 725 741

 Level 12
 201 Kent Street
 Sydney NSW 2000

 Tel 02 8218 7055
 Fax 02 8218 7686

D01/55202



RAC0008PZU

21 December 2001

Mr Tim Grimwade
 General Manager – Adjudication Branch
 Australian Competition and Consumer Commission
 PO Box 1199
 DICKSON ACT 2602

Dear Mr Grimwade

Exclusive Dealing Notification

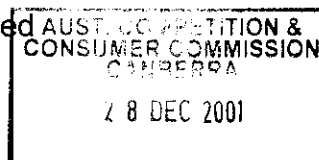
RAMS Home Loans Pty Limited offers home loan finance to Australian property buyers and property owners wishing to refinance their loans. In addition, related products are offered in alliance with third party service providers. Examples of our alliance providers are:

- Royal & Sun Alliance Insurance Australia Limited – deposit bonds, home and contents insurance
- St Andrew's Insurance (Australia) Pty Limited – mortgage protection insurance
- Citibank Limited – credit card
- Better Conveyancing – conveyancing services.

All of these products (with the exception of Better Conveyancing) are badged as RAMS products. Better Conveyancing is an independent business providing conveyancing services to the general public and RAMS customers.

From time to time we would like to run campaigns where we offer RAMS home loans in combination with one or more of the above products which may entitle the customer to a discounted home loan application fee or relaxed product entitlement criteria. Some examples of our proposals are:

- SmartWay Home Loan product bundling campaign – see attached proposed advertising flyer.



- SmartWay Gold/Better Conveyancing campaign (NSW only) – RAMS will reduce the minimum loan size eligibility criteria for new loan applications for loan product SmartWay Gold from \$350,000 to \$250,000 if the customer chooses to use Better Conveyancing for their conveyancing needs.
- SmartWay/Better Conveyancing campaign – customers taking a Smartway loan product (limited to 350) will receive a \$200 discount on conveyancing fees if the customer chooses to use Better Conveyancing for their conveyancing needs.
- TelegRAMS and 2nd Anniversary customer offers – periodic mailouts. RAMS customers using Better Conveyancing will receive free written loan security document advice if taking out a new or additional RAMS home loan – see attached advertising flyers.

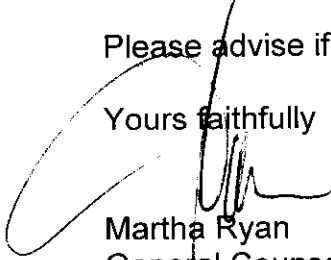
Our campaigns will be a mixture of the above examples using the third party products listed. Our Form G (Exclusive Dealing Notification) is also attached providing further information of our proposed campaigns to you, plus the \$100 prescribed notification fee cheque.

It is our view that the proposed conduct by RAMS would benefit consumers of home loans and associated products by offering them genuine savings on our product range. It is also our view that there is no public detriment in that all of the products offered in the packaging will be available to any customer either alone or through a combination of one or more of them. The customer may choose to take the "bundle" on offer and thereby save.

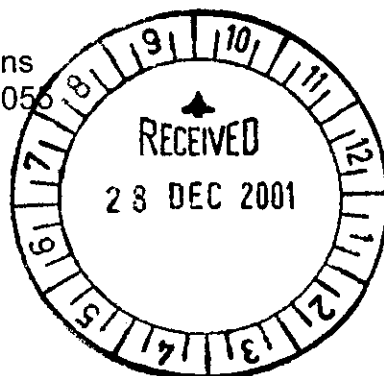
We would like to commence our campaigns mid January 2002 and ask that the Commission consider granting a "blanket" immunity to prosecution on the basis our campaigns remain within the parameters of the campaigns outlined in this communication.


Please advise if you need any further information.

Yours faithfully


 Martha Ryan
 General Counsel
 RAMS Home Loans
 Direct line 8218 7056

Encl




 Donna Langford
 Operations Manager
 RAMS Home Loans
 Direct line 8218 7029

TO

JACKIE

FROM: JILL



Put your feet up with a
RAMS Complete
 Home Buyers Package and
 pay \$0 application fee.

PRODUCT BUNDLING

Take the award-winning RAMS all-in-one SmartWay Home Loan. Then choose the options below and you'll pay no application fee - saving you \$595.

RAMS Home Insurance and Contents Insurance.*

RAMS Mortgage Protection Insurance for extra peace of mind.

A RAMS MasterCard at just 6.9%p.a.** for the first 9 months.

Call RAMS for a home loan package tailored to save you time & money.

DRAFT



RAMS. A Better Way.™

Call 13 RAMS, that's 13 7267 ext 966 or visit rams.com.au

*Conditions, fees & limitations apply. *Insurance provided by Royal & SunAllianz. **Reverts to our standard rate after 9 months

currently
 4.4%

declare st Andrews

Telegrams

is acting on your behalf and Better Conveyancing itself

DRAFT

BETTER Conveyancing.

Looking for a home in NSW? RAMS can now point you to an expert conveyancing company. Better Conveyancing can take you through the whole buy and selling process with an accredited and competitive pricing.

A special offer for RAMS customers: If you are taking out a new or additional RAMS Home Loan, Better Conveyancing offers free written advice on your loan security documents. Valued at \$150 (GST). It's free to you as a RAMS customer. Applies only to borrowers in NSW.


For details call (02) 8220 6500

for

2nd Anniversary
mailout

Page 1

DRAFT



**Now there's A Better way
to get conveyancing!**

Buying a home in NSW* but need some cost-effective, professional conveyancing? With the help of RAMS, you can.

Our alliance with Better Conveyancing means you'll benefit from ~~agreed fees~~, competitive pricing, better value and easy to understand documents.

"up front" pricing

DRAFT

What makes Better Conveyancing A Better Way?

- Takes the confusion away when buying or selling property
- Always on hand for friendly advice in plain English
- Brochures that are simple to read and understand
- Professionally qualified and experienced staff
- Competitively priced and upfront, with no 'surprises' in the final bill
- Property law specialists that give you the very best legal advice

have Better Conveyancing act for you

Special Offer For All RAMS Customers

Take out any new RAMS Home Loan before 31 December 2002, and Better Conveyancing will give you free written advice on your loan security (mortgage) documents - worth \$195. All you have to do is call us using the number below, and we'll talk you through the whole process.

For details, simply call 02 8220 6500.



*At present, this service is currently available only to customers buying or selling property located in New South Wales.

Form G

Commonwealth of Australia
Trade Practices Act 1974 --- Sub-section 93(1)
**EXCLUSIVE DEALING
NOTIFICATION**

To the Australian Competition and Consumer Commission:

Notice is hereby given, in accordance with sub-section 93(1) of the Trade Practices Act 1974, of particulars of conduct or of proposed conduct of a kind referred to in sub-section 47(2), (3), (4), (5), (6) or (7), or paragraph 47 (8) (a), (b) or (c) or (9) (a), (b), (c) or (d) of that Act in which the person giving notice engages or proposes to engage.

(PLEASE READ DIRECTIONS AND NOTICES ON BACK OF FORM)

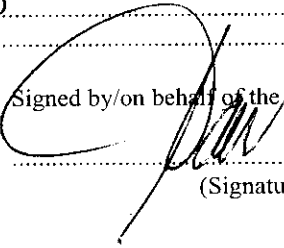
1. (a) Name of person giving notice.....**RAMS HOME LOANS PTY LIMITED**.....
.....
(See Direction 2 on the back of this form)
(b) Short description of business carried on by that person
.....**HOME LOAN PROVIDER**.....
(c) Address in Australia for service of documents on that person
.....**LEVEL 12, 201 KENT STREET, SYDNEY 2000**.....

2. (a) Description of the goods or services in relation to the supply or acquisition of which this notice relates
.....**INSURANCE, CREDIT CARD AND CONVEYANCING**.....
(b) Description of the conduct or proposed conduct
.....**SEE ATTACHMENTS**.....
(See Direction 4 on the back of this Form)

3. (a) Class or classes of persons to which the conduct relates
.....**ACQUIRERS OF HOME LOANS AND ASSOCIATED PRODUCTS**.....
(b) Number of those persons--
(i) At present time **NONE**.....
(ii) Estimated within the next year... **UNKNOWN BUT EXPECTED TO BE SEVERAL THOUSAND**.....
(c) Where number of persons stated in item 3 (b) (i) is less than 50, their names and addresses
.....**N/A**.....

4. Names and address of person authorised by the person giving this notice to provide additional information in relation to this notice..... **MARTHA RYAN OR DONNA LANGFORD, LEVEL 12,**
.....**201 KENT STREET, SYDNEY 2000**.....

Dated 21.12.2001

Signed by/on behalf of the applicant giving notice

.....
(Signature)

.....
(Full Name) **Martha Ryan**
.....
(Description) **GENERAL MANAGER +
Company Secretary
RAMS HOME LOANS PTY**

DIRECTIONS

1. If there is insufficient space on this form for the required information, the information is to be shown on separate sheets, numbered consecutively and signed by or on behalf of the person giving the notice
2. If the notice is given by or on behalf of a corporation, the name of the corporation is to be inserted in item 1(a), not the name of the person signing the notice, and the notice is to be signed by a person authorised by the corporation to do so.
3. In item 1(b), describe that part of the business of the person giving the notice in the course of which the conduct is engaged in.
4. If particulars of a condition or of a reason of the type referred to in sub-section 47(2), (3), (4), (5), (6), (7), (8) or (9) of the *Trade Practices Act* 1974 have been reduced in whole or in part to writing, a copy of the writing is to be provided with the notice.
5. In item 3 (a), describe the nature of the business carried on by the persons referred to in that item.
6. In item 3(b) (ii), state an estimate of the highest number of persons with whom the person giving the notice is likely to deal in the course of engaging in the conduct at any time during the next year.

NOTICE

If this notification is in respect of conduct of a kind referred to in sub-section 47(6) or (7) or paragraph 47(8)(c) or (9) (d) of the *Trade Practices Act* 1974 ("the Act"), it comes into force at the end of the period prescribed for the purposes of subsection 93(7a) of the Act ("the prescribed period") unless the Commission gives a notice under sub-section 93A(2) of the Act within the prescribed period, or this notification is withdrawn.

The prescribed period is 21 days (if this notification is given on or before 30 June 1996) or 14 days (if this notification is given after 30 June 1996), starting on the day when this notification is given.

If the Commission gives a notice under sub-section 93A(2) of the Act within the prescribed period, this notification will not come into force unless the Commission, after completing the procedures in section 93A of the Act, decides not to give a notice under subsection 93(3A) of the Act. The notification comes into force when that decision is made.

If this notification is in respect of conduct of a kind referred to in subsection 47(2), (3), (4) or (5), or paragraph 47(8)(a) or (b) or (9)(a), (b) or (c), of the Act, it comes into force when it is given.