

FILE No:

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MARS/PRISM:

Tel 02 8218 7055

Fax 02 8218 7686

17 December 2003

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. RAMS currently sells its product range utilising the services of independent contractors (individuals and small companies) and sales employees.

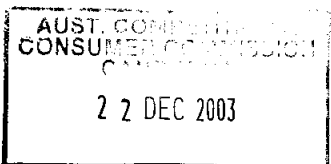
RAMS has developed a franchise model where we will licence individuals ("Franchisees") to set up a RAMS Home Loans Centre "store" and sell our products and approved third party products. Franchisees will only be allowed to sell RAMS products or RAMS approved products in the same way that say a McDonalds franchisee may only sell specified products.

We will also licence the franchisees to register a business name incorporating the "RAMS" name and to use our trade marks and other intellectual property ("RAMS material") in a controlled manner.

There are strict rules in the franchise agreement and operations manual relating to use of the RAMS material and in relation to the "look and feel" of the individual RAMS Home Loan Centres (approximately 50). We have developed these rules so that we can protect the RAMS brand name and image and our intellectual property generally. We consider that this is a common course of action by a franchisor.

In order to protect this intellectual property, we propose having several mandatory suppliers for certain of our requirements, many of which have previously received notification approval from the ACCC.

When selecting our mandatory suppliers we have taken steps to ensure that we have obtained competitive pricing for the products or services in question and we will



have a contractual obligation to monitor and review the quality and pricing of the these products and services annually.

As detailed in our submission of 22 January 2003, there are strict rules in the franchise agreement and franchise operations manual relating to use of the RAMS material and in relation to the "look and feel" of the individual RAMS Home Loan Centres (approximately 50). RAMS has developed these rules so that it can protect the RAMS brand name and image and our intellectual property generally. RAMS considers that this is a common course of action by a franchisor.

RAMS is seeking to appoint Clifton Coney Stevens as a mandatory supplier to project manage the fit out of the RAMS stores.

It is our view that the proposed conduct by RAMS would benefit the franchisees in that they will have access to the intellectual property required to operate their business and the pricing RAMS has achieved is very competitive because RAMS can offer franchisees genuine savings due to the volumes involved. It is also RAMS' view that there is no public detriment in following this course of action and that it is common place in a franchisee/franchisor arrangement.

RAMS asks that the Commission consider granting immunity to prosecution on the basis that RAMS' activities remain within the parameters of the conduct/arrangements outlined in this communication.

I enclose Form G seeking authorisation for this conduct involving Clifton Coney Stevens, and our cheque for \$100.00 (RAMS being a proprietary company).

Please advise if you need any further information.

Yours faithfully



Martha Ryan
General Counsel
RAMS Home Loans Pty Limited
Direct line 8218 7055

Encl

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

Provider of home loans & associated products

(c) Address in Australia for service of documents on that person

44 Bay Street, Ultimo 2007

2. (a) Description of the goods or services in relation to the supply or acquisition of which this notice relates

Project management of Home loan Centre fit-out

(b) Description of the conduct or proposed conduct

Described in attached submission

(See Direction 4 on the back of this Form)

3. (a) Class or classes of persons to which the conduct relates

Franchisees of Rams Business

(b) Number of those persons--

(i) At present time 33

(ii) Estimated within the next year.....

(c) Where number of persons stated in item 3 (b) (i) is less than 50, their names and addresses

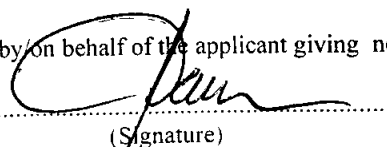
See attached.

4. Names and address of person authorised by the person giving this notice to provide additional information in relation to this notice.

Martha Ryan, Rams Home Loans 44 Bay St
ULTIMO NSW 2007

Dated 17.12.03

Signed by/on behalf of the applicant giving notice


(Signature)

(Full Name)

(Description)

Martha Ryan
Company Secretary

HOME ADDRESS

RHLC/BUSINESS NAME (Martha)						CONTACT NUMBER (States)	MOBILE NUMBER (States)
RAMS Home Loans Northern Districts	Paul Van Rooyen	6 Chester Road	Turramurra	NSW	2074	(02) 9440 2281	0409 786829
RAMS Home Loans Chatswood	Avinder Paul	14 Wahoonga Avenue	Wahoonga	NSW	2076	(02) 9489 0780	0403 594399
RAMS Home Loans Hills District	Hank Schumacher	8 Washington Place	Castle Hill	NSW	2154		0421 999500
RAMS Home Loans South East - Randwick	Gary Spreckley Hamish Barker Lisa Frazer	Unit 5, 60 Bellevue Road	Bellevue Hill	NSW	2023	(02) 9382 4684	0410 598448 0414 914598
RAMS Home Loans Hunter Coast	Greg Frazer Michael Delany Julia Teasdel Tom Lester	25 Palm Tree Crescent 8/5 The Esplanade 8/5 The Esplanade 1/12 Etham Avenue	Caves Beach Balmoral Beach Balmoral Beach Darling Point	NSW	2281 2088 2088 2027	(02) 4972 0883	0423 774839 0418 295367
	Neil Lorrigan	18 Hambleton Crescent	Murrumbidgee Downs	QLD	4053	(07) 3204 4117	0409 762581
RAMS Home Loans Alphington	Stan Marinis	25 Nungerner Street	Balwyn	VIC	3103	(03) 9499 3435	0407 095520
	Glenn Ruthven	19 Park Street	St Kilda West	VIC	3182		0412 594228
RAMS Home Loans Western Region	Steve Bogue	3 Greybox Court	Hillside	VIC	3037		0407 660884
RAMS Home Loans Bendigo	Paul Brock Rajeev Dixit	49 Bull Street 5/12 Turvey Street	Bendigo Padstow	VIC NSW	3550 2011	(03) 5444 4105	0414 482025
RAMS Home Loans Bankstown	Boushra Gadallah	27/38-42 Bay Street	Rockdale	NSW	2216	(02) 9796 4500	
RAMS Home Loans Centre Berwick Region	David O'Callaghan	15 Bernerswade Drive	Berwick	VIC	3806		0419 519721
RAMS Home Loans Southern Region	Jamie Bartling	6 Breese Road	Langwarrin	VIC	3910		0438 762608
RAMS Home Loans Centre Boronia	David Brown	7 Locksley Chase	Vermont	VIC	3133		0419 125596

HOME ADDRESS

RHLC/BUSINESS NAME (Martha)						CONTACT NUMBER (States)	MOBILE NUMBER (States)
RAMS Home Loans Centre Eastern Region	Elio Cosentino	1 Charles Street	Mount Waverley	VIC	3149		0413 019072
RAMS Home Loans Malvern	Jeffrey Oberman Sam El Sayed	13 Sundew Court 397 Church Street	Knoxfield Parramatta	VIC NSW	3180 (03) 9896 2222 2150 (02) 9630 1680		0417 322093
RAMS Home Loans Parramatta	Norman Vancuylenberg	24 Rubina Street	Merrylands	NSW	2160		
RAMS Home Loans Macarthur District and Liverpool	Michael Sullivan	3 Barwon Place	Campbelltown	NSW	2560 (02) 4647 3677		
RAMS Home Loans Victoria Park	Richard Elhaj	35 Waterway Crescent	Ascot	WA	6104		0422 140371
RAMS Home Loans Inner Western Region	Bill Asani Fabio Taini	35 Wellesley Drive 30 Haddington Cres	Taylors Lake Greenvale	VIC VIC	3038 3059		0419 304971 0417 010216
RAMS Home Loans North West Region	Sergio Tribuzio						
RAMS Home Loans North and East WA	Peter Blakeley	50 Horslay Way	Noranda	WA	6062 (08) 9301 1190		0400 314674
RAMS Home Loans Perth	Grant Godber	36A Unwin Avenue	Wembley Downs	WA	6019		0419 125588
RAMS Home Loans Hurstville	Michael Baird	32 Meehan Street	Malabar	NSW	2036 (03) 9311 2783		0414 727966
RAMS Home Loans Brisbane South West	Grant Jacques	214 Bielby Road	Kenmore Hills	QLD	4069 (07) 3378 6654		0400 725009
RAMS Home Loans Far North QLD	Garry Sciberas			QLD	(07) 4059 1991		0418 742816
RAMS Home Loans Gold Coast North	David MacInnes	8389 Magnolia Drive	East Hope Island	QLD	4212		0412 421035
RAMS Home Loans Gold Coast North	Mike Christie	33 Forest Circuit	Peregian Beach	QLD	4573		0409 921470
RAMS Home Loans Gold Coast North	Peter Jones			QLD			

HOME ADDRESS

RHL/BUSINESS NAME (Martha)					CONTACT NUMBER (States)	MOBILE NUMBER (States)
RAMS Home Loans Upper Northern Suburbs	Narelle Campbell	18 Koombalah Avenue	Turrumurra	NSW	2074	0412 195431
	Wendy Stevenson	26 Eddie Avenue	Panania	NSW	2213	0419 267298
RAMS Home Loans Rockingham	Jeff Hilton	129 Lawler Street	Subiaco	WA	6008	0417 052206