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Our Ref:

C2004/436

31 March 2004

Dear

Applications for Authorisation lodged by the Department of Industry, Tourism and Resources relating to the preferential/exclusive treatment of accredited tourism businesses (A90912 and A90913)

The Australian Competition and Consumer Commission (the Commission) has received applications for authorisation lodged by the Department of Industry, Tourism and Resources (ITR) relating to preferential and/or exclusive treatment of accredited tourism businesses. The Commission is undertaking interested party consultations and would appreciate your comments on the public benefits and detriments of the proposed conduct.

The Commission's role

By way of background, the Commission is the Commonwealth agency responsible for administering the *Trade Practices Act 1974* (the Act). A key objective of the Act is to prevent anti-competitive arrangements or conduct, thereby encouraging competition and efficiency in business resulting in a greater choice for consumers in price, quality and service.

The Act, however, allows the Commission to grant immunity from legal action for anti-competitive conduct in certain circumstances. One way businesses may obtain immunity is to apply for what is known as an 'authorisation' from the Commission. Broadly, the Commission may 'authorise' businesses to engage in anti-competitive arrangements or conduct where it is satisfied that the public benefit from the arrangements or conduct outweighs any public detriment.

In assessing the public benefits and detriments of an authorisation application, the Commission undertakes a public consultation process seeking comments on the application from interested parties.



ITR's applications

On 18 March 2004 the Commission received two applications for authorisation lodged by ITR on behalf of Tourism Victoria, Tourism Tasmania, the South Australian Tourism Commission, the Northern Territory Tourist Commission, the Western Australian Tourism Commission, Australian Capital Tourism (collectively, the State and Territory Organisations - STO's) and the Australian Tourist Commission (ATC). This group will be referred to as 'the Applicants'.

One of the applications is expressed in such a way as to allow Tourism Queensland to become a party to the agreement with the STOs and the ATC at a later date. However, if and when this occurs, Tourism Queensland will need to lodge a further application for immunity to engage in the conduct. Tourism New South Wales is currently not a party to the applications.

The Applicants propose two types of conduct, which they describe as the 'exclusive' and 'preferential' access to a range of their tourism services.

In relation to exclusive access, the Applicants are seeking authorisation to only allow tourism businesses to participate in their promotional, marketing and wholesaling activities where the tourism business is accredited under a program endorsed by the Australian Tourism Accreditation Association framework (ATAA) (or a successor to this framework).

The promotional, marketing and wholesaling activities include the following:

- promotional publications including: STO 'tourism' branding; television, radio and newspaper advertising; website listings and links; tourism signage; interstate/international tourism displays and exhibitions; direct mail, outdoor and on-line marketing and consumer brochures and pamphlets;
- media and trade familiarisations;
- making reservations for consumers with tourism businesses;
- making recommendations to consumers about tourism services;
- inclusion in the State (and consequently Australian) Tourism Data Warehouse;
- the racking of brochures in retail visitor centres; and
- the wholesaling of tourism services.

In relation to preferential access, the Applicants seek authorisation to only allow tourism businesses preferential access to their promotional, marketing and wholesaling activities where the tourism business is accredited under a program endorsed by the ATAA framework (or a successor to this framework). Preferred treatment may apply to the above listed activities and may also include:

- providing discounts to accredited operators;
- providing accredited operators with greater prominence in the applicants' tourism promotion activities, for example, highlighted listing on STO websites.

ITR's supporting submission

The Applicants' submit that there is a net benefit to the community from the proposed conduct. In summary, they submit that the public benefits are:

- improved business efficiency among participating firms and increased national and international competitiveness for Australia;
- the ability to establish a strong marketing brand for Australian tourism focussed on a high quality, reliable product;
- improvement in the quality and safety of goods and services (encouraging the take up of accreditation will promote compliance with safety regulations); and
- the supply of better information to consumers and business to permit informed choices in their dealings (accreditation is a 'marker' of superior business professionalism).

It is submitted that the combination of these factors is likely to lead to:

- growth in the tourism export market (ie. increased inbound tourism resulting from greater professionalism and reputation);
- development of import replacements (increased information and product quality will keep more Australians holidaying at home as opposed to overseas);
- economic development and expanded employment opportunities; and
- greater tourist yield as Australia delivers on its "platinum plus" reputation rather than volume.

The Applicants submit that public detriment from the proposed conduct is considered to be, at worst, minimal. Where it does exist it may take the form of:

- some accreditation program managers choosing not to align with the national framework and suffering a small reduction in revenue as a result; and
- some tourism businesses choosing not to become accredited and, as a result, not having access to the applicants' services. The outcome may be a minor reduction in viability.

The Applicants submit that the proposed conduct will provide a net public benefit in all circumstances and should therefore be allowed. It is submitted that if the application for authorisation is not approved, it is likely that current market failures and unprofessional practices in the tourism industry will continue to exist. These will be detrimental to both the industry and to consumers.

Request for submissions

Due to the number and variety of organisations that may be affected by these applications, the Commission is unable to consult all relevant organisations directly. However, the Commission has written to a range of industry associations, unions and relevant government departments as well as a number of randomly selected businesses.

To assist the Commission in its consideration of the applications for authorisation it would be helpful to obtain your comments on the applicants' claims and the public benefits and detriments of the proposed conduct.

The Commission asks for submissions to be in writing so they can be made publicly available. They are placed on a public register for this purpose.

Persons lodging a submission with the Commission may request that information included in the submission be treated as confidential and not placed on the public register. If confidentiality is granted in respect of information the Commission may take it into account, even though it is not publicly available. Guidelines for seeking confidentiality are attached.

If you wish to lodge a submission, please address your submission to:

The General Manager Adjudication Branch Australian Competition and Consumer Commission PO Box 1199 DICKSON ACT 2602

Submissions can also be lodged by email to: adjudication@accc.gov.au

Please ensure that your submission reaches the Commission by 30 April 2004.

If you do not wish to make a submission at this time, but would like to be informed of the progress of these applications at the draft and final determination stages, please inform us by contacting Michael Green on (02) 6243 1088 or by email at michael.green@accc.gov.au.

A copy of the applications and the supporting submission is available on the Commission's website http://www.accc.gov.au/authAndNotif/currauth.htm. Alternatively, please contact Michael Green to request that a hard copy be sent to you. The Commission recommends that you access a copy of the applicants' supporting submission before making a submission. You can also forward this letter to any other party who may wish to make a submission to the Commission.

A copy of this letter will be placed on the Commission's public register.

Yours sincerely

Tim Grimwade General Manager Adjudication Branch

GUIDELINES FOR CONFIDENTIALITY CLAIMS Authorisations

The process whereby the Commission assesses applications for authorisation is very public, transparent and consultative. The *Trade Practices Act 1974* (the Act) requires the Commission to maintain a public register in respect of authorisation applications.

Applicants and interested parties can request that a submission, or a part of a submission, be excluded from the public register.

The Commission is required under the Act to exclude from the public register upon request details of:

- (i) secret formulae or processes;
- (ii) the cash consideration offered for the acquisition of shares in the capital of a body corporate or assets of a person; or
- (iii) the current manufacturing, producing or marketing costs of goods or services.

The Commission also has the discretion, under s 89 of the Act, to exclude material from the public register if it is satisfied that it is desirable to do so, either by reason of the confidential nature of the material or for any other reason. The Commission expects that a party claiming confidentiality on these grounds will present a case for its treatment in this manner.

Under Regulation 24 of the *Trade Practices Regulations*, when a request for confidentiality is made to the Commission:

- (a) where the request is that a whole document be excluded, the words "Restriction of Publication Claimed" should appear in red writing near the top of each page; and
- (b) where the request is that part of a document be excluded, the words "Restriction of Publication of Part Claimed" should appear in red near the top of the first page of each document, and the part for which confidentiality is claimed should also be marked in red. A submission of more than 5 pages should also include a description of the whereabouts of the parts for which confidentiality is claimed.

However, even if a document does not meet these technical requirements, the Commission may still grant confidentiality where, in the Commission's view, it is desirable to do so.

If the Commission denies a confidentiality request, the requesting party may ask that the material be returned. As a matter of practice, the Commission will specify a period (usually 14 days) in which they can request the return of such material. Upon response, the Commission will return the original material and destroy all associated copies. The Commission will not consider this material when reaching its decision.

If the Commission does not receive a response within the specified period, the original material will be placed on the public register.

Information or documents granted confidentiality may be used by the Commission pursuant to its powers generally under the *Trade Practices Act*.

Last Updated: 12 December 2002

Title	First Name	Surname	Job Title	Company	Address
Mr	Jeff	Floyd	Chief Executive Officer	AAA Tourism	3/131 Queen St Melbourne VIC 3000
Ms	Lois	Peeler	Chairperson	Aboriginal Tourism Australia	PO Box 18315 Collins Street East Melbourne VIC 8003
		Sir/Madam		Ausemade Pty Ltd	PO Box A2126 Sydney South NSW 1235
Mr	Ross	Adler	Chairman	Austrade	The R G Casey Building John McEwan Crescent Barton ACT 2600
Mr	Brian	Nye	Chief Executive Officer	Australasian Railway Association	PO Box 4864 Kingston ACT 2604
Mr	Michael	Cannon	Executive Director	Australian Association of Convention Bureaux	Level 13/80 William Street Woolloomooloo NSW 2011
Mr	Peter	Cook	Chair	Australian Bed and Breakfast Council	PO Box 1242 Capalaba QLD 4157
Ms	Christine	Telfer	Chairperson	Australasian Business Travel Association	PO Box 812 Rockdale NSW 2216
		Sir/Madam		Australian Camping Association	Locked Bag 2000 Coburg VIC 3058
Mr	Peter	Hendy	Chief Executive	Australian Chamber of Commerce and Industry	PO Box E14 Kingston ACT 2604
Mr	Ian	Carew-Reid	Chairman	Australian Federation of Travel Agents Limited	Level 3, 309 Pitt Street Sydney NSW 2000
Mr	Tony	Brown	Director	Australian Capital Territory Consumer Affairs Bureau	GPO Box 158 CANBERRA ACT 2601
Mr	Chris	Field	Chair	Australian Consumers Association	57 Carrington Road MARRICKVILLE NSW 2204

Title	First Name	Surname	Job Title	Company	Address
		Sir/Madam		Australian Explorer Pty Ltd	PO Box 1172 Southport BC QLD 4215
Mr	Jim	Lewis	President	Australian Farm and Country Tourism	Lvl 2 Rialto Nth Twr 525 Collins St Melbourne VIC 3000
Mr	Brian	Ross	General Manager	Australian Hotels Association	Level 5, 8 Quay Street SYDNEY NSW 2000
		Sir/Madam		Australian Online Travel	PO Box 404 Camperdown NSW 2050
Ms	С	Rae	Federal Secretary	Australian Institute of Travel and Tourism	PO Box 2297U Melbourne VIC 3001
Mr	Tom	Phillips	President	Australian Institute of Tourism Officers	PO Box 178, Civic Square Pos Office Canberra ACT 2601
Mr	Laurie	O'Meara	President	Australian Tourism Accreditation Association Ltd	c/- Emerald Hote 24 Mount Street PERTH WA 6000
Mr	Peter	Shelley	Managing Director	Australian Tourism Export Council	Level 2/80 William St Woolloomooloo NSW 2011
		Sir/Madam		Australian Regional Tourism Network	C/- Centre for Regional Tourish Research School of Tourish and Hospitality Management Southern Cross University PO Box 157 LISMORE NSW 2480
		Sir/Madam		Australian Travel Marketing	Suite 1804, Towe 2, Westfield Plaz 500 Oxford Stree Bondi Junction NSW 2022

Title	First Name	Surname	Job Title	Company	Address
Mr	Jonathon	Scott	General Manager	Australian Wine Export Council	PO Box 2733 Kent Town SA 5071
Ms	Audrey	Murton	Manager	Brochure Flow International	Unit 7, 2-4 Dunlop St Strathfield South NSW 2136
		Sir/Madam		Camping Association of Victoria	Locked Bag 2000 Coburg VIC 3058
Mr	Ben	Yates	Executive Officer	Caravan Industry Australia	64 Harcourt St North Melbourne VIC 3051
Mr	Mike	Harris	Acting Chief Executive	Chief Minister's Department	GPO Box 158 Canberra ACT 2601
Dr	David	Cousins	Director	Consumer Affairs Victoria	GPO Box 123A MELBOURNE VIC 3001
Ms	Carolyn	Bond	Chair	Consumers' Federation of Australia	C/- 1 st Floor, 11-19 Bank Place MELBOURNE VIC 3000
Prof	Terry	De Lacy	Chief Executive	Sustainable Tourism CRC	PMB 50 Gold Coast MC QLD 9726
Mr	Peter	Bailey	Chairman	Council of Australian Tour Operators	Level 3, 309 Pitt Street Sydney NSW 2000
Mr	Mike	Potter	Chief Executive Officer	Council of Small Business Organisations of Australia Ltd	PO Box E445 Kingston ACT 2604
Mr	Tom	Smith	Chairman	Country Victoria Tourism Council	PO Box 18136 Collins St East Melbourne VIC 8003
Mr	Patrick	Walker	Executive Director, Consumer Protection	Department of Consumer and Employment Protection	Locked Bag 14 CLOISTER SQUARE WA 6850
Mr	Paul	Tyrrell	Chief Executive	Department of the Chief Minister	GPO Box 4396 Darwin NT 0801
Mr	Mal	Wauchope	Director General	Department of the Premier and	197 St George's Terrace

Title	First Name	Surname	Job Title	Company	Address
				Cabinet	Perth WA 6000
Mr	Warren	McCann	Chief Executive	Department of Premier and Cabinet	GPO Box 2343 Adelaide SA 5001
Mr	Теггу	Moran	Secretary	Department of the Premier and Cabinet	1 Treasury Place Melbourne VIC 3002
Mr	Philip	Foulston	Director	Department of the Premier and Cabinet	GPO Box 123 Hobart TAS
Dr	Leo	Keliher	Director- General	Department of the Premier and Cabinet	PO Box 185 Brisbane QLD 4002
Ms	Jenny	Goddard	Deputy Secretary	Department of Prime Minister and Cabinet	3- 5 National Circuit BARTON ACT 2600
Dr	Ken	Henry	Secretary	Department of the Treasury	Langton Crescent PARKES ACT 2600
Ms	Clare	McFarlane	President	Ecotourism Association of Australia	GPO Box 268 Brisbane QLD 4001
Ms	Camille	Bradsmith	President	Events Industry Association (WA)	PO Box 3132 Myaree WA 6154
Ms	Carrie	Elton	Executive Director	Exhibition and Event Association of Australasia	P O Box 751 Rozelle NSW 2039
Mr	Shane	Flynn	Chief Executive Officer	Flight Centre	Level 11, 157 Ann Street Brisbane QLD 400
Mr	Brian	Bowater		Great Aussie Holidays	P.O. Box 835 Cloverdale WA 6985
Ms	Cathy	Parsons	Chief Executive Officer	Green Globe 21	GPO Box 371 Canberra ACT 2612
Mr	Barry	Mayo	Managing Director	Harvey World Travel	631 Princes Highway Kogarah NSW 2217
Mr	Dennis	Winchester	Chief Executive Officer	Hotel Motel and Accommodation Association	Level 3, 551 Pacific Highway St Leonards NSW 2065
Mr	Malcolm	Campbell	General	Horizon	PO Box CP311

Title	First Name	Surname	Job Title	Company	Address
			Manager	Airlines Pty Ltd	Condell Park NSW 2200
Mr	Clive	Jimmieson	General Manager Australia	Jasons Travel Media Pty Ltd	46 Edward Street Brisbane QLD 4001
Mr	Tony	Wheeler	Managing Director	Lonely Planet Publications	Locked Bag 1 Footscray Victoria 3011
Ms	Jenny	Lambert	Chief Executive Officer	Meetings Industry Association of Australia	PO Box 1477 Neutral Bay NSW 2089
Ms	Meredith	Hinchliffe	Executive Officer	Museums Australia	PO Box 266 Civic Square ACT 2608
Ms	Nicole	Sheridan	Executive Officer	National Tourism Alliance	Level 3, 309 Pitt Street Sydney NSW 2000
Mr	David	O'Connor		New South Wales Department of Fair Trading	PO Box 972 PARRAMATTA NSW 2124
Dr	Col	Gellatly	Director General	NSW Premier's Department	GPO Box 5341 Sydney NSW 2001
Ms	Penni	Tatsula	Managing Director	Northern Gateway Pty Ltd	PO Box 2541 Darwin NT 0801
Ms	Cheryl	Kuhn	Chair	Northern Territory Office of Consumer Affairs	PO Box 39717 Winnellie NT 0821
		Sir/Madam		Online Travel Corporation	P.O. Box 772 Sydney NSW 2001
Ms	Libby	Small		Outdoor Tour Operators Association	Pitt Street Sydney NSW 2000
Mr	Arthur	Crichton	President	Outdoor Recreation Industry Council of NSW	PO Box 634 Wahroonga NSW 2076
Mrs	Anne	Bottomley		Professional Tour Guide Association of Australia	PO Box 34 Armadale VIC 3143
Mr	Brett	Johnson	General	Qantas Airways	203 Coward Street

Title	First Name	Surname	Job Title	Company	Address
			Counsel	Limited	MASCOT NSW 2020
Mr	Matt	Miller	Commissioner	Queensland Office of Fair Trading	PO Box 3111 BRISBANE QLD 4001
Mr	Robbie	O'Rourke	Associate Publisher (Travel and Hospitality)	Reed Business Information	Locked Bag 2999 Chatswood DC NSW 2067
Mr	Bob	Mason	Chief Executive Officer	Regional Aviation Association Australia	PO Box 4242 Kingston ACT 2604
Mr	Michael	Jones	Chief Executive Officer	Regional Express Airlines	PO Box 807 Mascot NSW 1460
Mr	John	Hart	Chief Executive Officer	Restaurant and Catering Australia	Suite 32, 401 Pacific Highway Artarmon NSW 2064
Mr	Russel	Boswell	President	Savannah Guides Limited	PO Box 8043 Cairns QLD 4870
Mr	Scott	Henderson	Chief Executive Officer	Skywest Airlines	PO Box 176 Cloverdale WA 6985
Ms	Sue	Smith	Managing Director	STA Travel	Sydney Glasshouse Shopping Centre 135 King Street Sydney NSW 2000
Mr	Ross	Wraight	Chief Executive	Standards Australia	GPO Box 5420 Sydney NSW 2001
Mr	Mark	Bodycoat	Commissioner	South Australia Office of Consumer and Business Affairs	GPO Box 1719 ADELAIDE SA 5001
Mr	Max	Moore- Wilton	Chief Executive Officer	Sydney Airports Corporation Limited	PO Box 63 Mascot NSW 1460
Mr	Ray	Ormerod	Director Consumer Affairs and Fair Trading	Tasmania Office of Consumer Affairs and Trading	GPO Box 1244 HOBART TAS 7001
		Sir/Madam		Tas Vacations	First Floor, 11 - 17 Argyle Street

Title	First Name	Surname	Job Title	Company	Address
					Hobart TAS 7000
		Sir/Madam		Tourism Accreditation Board of Victoria	Level 5, 315 Flinders Lane Melbourne VIC 3000
Mr	Tony	Thirlwell	Chief Executive Officer and General Manager	Tourism New South Wales	GPO Box 7050 Sydney NSW 2001
Mr	Stephen	Gregg	Chief Executive Officer	Tourism Queensland	GPO Box 328 Brisbane QLD 4001
Mr	Les	Cassar	Chairman	Tourism Taskforce Australia	Level 10, 100 William Street Sydney NSW 2011
Mr	Vincent	Borg	Chief Executive Officer	Tourist Australia Online	PO Box 959 Rockdale NSW 2216
Ms	Carole	Murphy		Travelsearch Australasia Pty Ltd	PO Box 104 Lindfield NSW 2070
Mr	Mike	Thompson	General Manager	Travelscene Limited	Level 3, 122 Walker Street North Sydney NSW 2060
Mr	Trevor	Hennigan		TravelScene International	PO Box 5105 Alberton SA 5014
Mr	Bill	Gair	Chief Executive Officer	travel.com.au	76-80 Clarence Street Sydney NSW 2000
Mr	Barry	Hickman	President	Trout Guides and Lodges Tasmania	C/- Tasmanian Fly Fishing Trout Guiding Service & School 53 Beefeater Street Deloraine TAS 7304
Mr	Simon	Von Saldern	Chief Executive	Victorian Tourism Operators Association	PO Box 18136 Collins Street West Melbourne VIC 8003

Title	First Name	Surname	Job Title	Company	Address
Mr	Brett	Godfrey	Chief Executive Officer	Virgin Blue	PO Box 1034 Spring Hill QLD 4001
Mr	Steven	Strachen	Chief Executive	Winemakers' Federation of Australia	National Wine Centre Botanic Road PO Box 2414 Kent Town SA 5071
Mr	Julian	Ledger	Chief Executive Officer	YHA Australia	422 Kent Street Sydney NSW 2000
Mr	Phil	Baker	Managing Director	Adelaide Airport	1 James Schofield Drive Adelaide Airport SA 5950
Mr	Koen	Rooijmans	Managing Director and Chief Executive Officer	Brisbane Airport Corporation Ltd	PO Box 61 Hamilton Central QLD 4007
Mr	Stephen	Byron	Managing Director	Canberra International Airport	2 Brindabella Circuit Canberra Airport ACT 2609
Mr	Robert	Noga	General Counsel	Hobart Airport	PO Box 1 Cambridge TAS 7170
Dr	Warren	Mundy	Manager Strategy	Melbourne Airport	Locked Bag 16 Gladstone Park VIC 3043
Mr	Ian	Kew	General Manager	Northern Territory Airports Pty	PO Box 40996 Casuarina NT 0811
Ms	Catherine	Rule	Chief Executive Officer	Australian Airports (Townsville) Pty Limited	PO Box 7636 Garbut QLD 4814
Mr	Graham	Muir	Chief Executive Officer	Westralia Airports Corporation	PO Box 6 Cloverdale WA 6985
Mr	George	Wright	Policy Coordinator	Australian Council of Trade Unions	Level 2 393 Swanston Street Melbourne VIC 3000
Mr	Paul	Slape	National Secretary	Australian Services Union	Ground Floor 116 Queensberry Street

Title	First Name	Surname	Job Title	Company	Address
					Carlton South VIC 3053
Mr	Ayman	Guirgius	Partner	Blake Dawson Waldron	GPO Box 4958 WW Melbourne VIC 3001
Mr	Garth	Foxwell		A Day Outdoors Touring Pty Ltd	PO Box 41 Doreen VIC 3754
		Sir/Madam		Lonsdale Villas	14 Beach Close Point Lonsdale VIC 3225
		Sir/Madam		Alpine Toboggan Park	2365 Plenty Rd Whittlesea VIC 3757
Ms	Alicia	Darvall	General Manager	Melbourne Fringe	PO Box 2953 Fitzroy VIC 3065
		Sir/Madam		Octagon Hobart	136 Davey Street Hobart TAS 7000
		Sir/Madam		Derwent Valley Railway	PO Box 478 New Norfolk TAS 7140
		Sir/Madam		Tamar River Retreat Guesthouse	123 Kayena Road Kayena TAS 7270
		Sir/Madam		Strahan Marine Charters	PO Box 104 Strahan TAS 7468
Ms	Pauline	Hedger		Wadlata Outback Centre	41 Flinders Terrace Port Augusta SA 5700
		Sir/Madam		Adelaide International Motel	521 Anzac Highway Glenelg North SA 5045
		Sir/Madam		Firefly Express	111 Franklin Street ADELAIDE SA 5000
Mr	Michael	Broadbent		Adelaide Prestige Chauffeured Services	19A Church Place PORT ADELAIDE SA 5015
		Sir/Madam		Fremantle Motor Museum	B Shed Victoria Quay PO Box 1520

Title	First Name	Surname	Job Title	Company	Address
					Carlton South VIC 3053
Mr	Ayman	Guirgius	Partner	Blake Dawson Waldron	GPO Box 4958 WW Melbourne VIC 3001
Mr	Garth	Foxwell		A Day Outdoors Touring Pty Ltd	PO Box 41 Doreen VIC 3754
		Sir/Madam		Lonsdale Villas	14 Beach Close Point Lonsdale VIC 3225
		Sir/Madam		Alpine Toboggan Park	2365 Plenty Rd Whittlesea VIC 3757
Ms	Alicia	Darvall	General Manager	Melbourne Fringe	PO Box 2953 Fitzroy VIC 3065
		Sir/Madam		Octagon Hobart	136 Davey Street Hobart TAS 7000
		Sir/Madam		Derwent Valley Railway	PO Box 478 New Norfolk TAS 7140
		Sir/Madam		Tamar River Retreat Guesthouse	123 Kayena Road Kayena TAS 7270
		Sir/Madam		Strahan Marine Charters	PO Box 104 Strahan TAS 7468
Ms	Pauline	Hedger		Wadlata Outback Centre	41 Flinders Terrace Port Augusta SA 5700
		Sir/Madam		Adelaide International Motel	521 Anzac Highway Glenelg North SA 5045
		Sir/Madam		Firefly Express	111 Franklin Street ADELAIDE SA 5000
Mr	Michael	Broadbent		Adelaide Prestige Chauffeured Services	19A Church Place PORT ADELAIDE SA 5015
		Sir/Madam		Fremantle Motor Museum	B Shed Victoria Quay PO Box 1520