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21 October 2005

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

**Re: Investment and Financial Services Association's (IFSA) Application for
revocation and substitution - Authorisation Nos: A90857 and A90869**

We are writing to comment upon the IFSA's application to the ACCC for revocation and substitution of authorisation nos. A90857 and A90869 to extend the authorisation for a period of time.

We support the application to extend the authorisation for an extended period of time and the application for an interim extension, pending the ACCC's final determination.

We have examined the IFSA's application and agree with the position that in making the application, the public benefits tends to outweigh the costs in terms of any potential decreased competition and possibly of higher premiums.

We wish to note that in the longer term the ACA has broader concerns regarding genetic testing for the purposes of determining insurance applications. One of our key concerns is to ensure that individuals' genetic information is protected from breaches of privacy and not used in any discriminatory manner; and there may need to be further safeguards.

We will be following the progress of this application. Please do not hesitate to contact us for further information.

Yours faithfully,

Alison So
Policy Officer