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Scott Gregson
 The General Manager
 Adjudication Branch
 Australian Competition & Consumer Commission
 PO Box 1199
 Dickson ACT 2602

Dear Mr Gregson

We thank you for your letter dated 11 October 2005 inviting ICA views on the Investment and Financial Services Association (**IFSA**) application for revocation and substitution of Authorisations A90986 & A90989.

The ICA supports the ACCC and the prevention of anti-competitive conduct. We appreciate that genetic testing is an important issue and we have thoroughly reviewed IFSA's application. The issues raised by IFSA in their previously successful application of November 2000 remain the same and the current application addresses both social and industry concerns. In our view the public benefit greatly outweighs any effects on competition and we support IFSA's application.

Thank you for inviting the ICA to make submissions.

Yours faithfully,

Vincent Green-Gibson
 Manager, Member Services
 Insurance Council of Australia
 Phone: 9253 5132

AUST. COMPETITION &
 CONSUMER COMMISSION
 CANBERRA
 31 OCT 2005