



**Australian  
Competition &  
Consumer  
Commission**

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Our Ref: C2006/454  
Contact Officer: Nadia Cooke  
Contact Number: (03) 9290 1478

23 March 2006

Robert Neely  
Partner  
Henry Davis York Lawyers  
44 Martin Place  
SYDNEY NSW 2000

Dear Mr Neely

**Third line forcing notifications N31552 and N31553 lodged by  
St.George Life Limited and Swann Insurance Pty Ltd**

I refer to the above third line forcing notifications lodged with the Australian Competition and Consumer Commission (ACCC) on 6 March 2006. The notifications have been placed on the ACCC's public register.

I note that the one of the notifying parties, Swann Insurance Pty Ltd, is a proprietary limited company. The prescribed fee for a third line forcing notification lodged by an individual or proprietary company is \$100. The prescribed fee for an additional related notification given by a party other than an individual or proprietary company is \$200. Therefore, the applicable fee in this instance is \$100 for the notification lodged by Swann Insurance Pty Ltd and \$200 for the related notification lodged by St George Life Limited. At the time of lodging the notifications the notifying parties paid fees totalling \$2000. Accordingly, please find attached a cheque for \$1700 by way of refund for the overpaid amount.

St.George Life and Swann Insurance have described the conduct the subject of the notifications as follows:

... St.George Life and Swann Insurance have entered into an arrangement to package and tailor a range of consumer credit



insurance products (**Insurance Products**) for distribution by St. George Bank.

...

Swann Insurance will also carry out certain administrative functions in respect of the Insurance Products, including processing product applications, underwriting and managing claims.

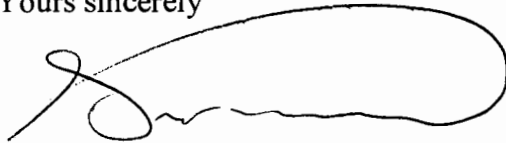
Legal immunity conferred by these notifications commenced on 20 March 2006.

On the basis of the information provided, it is not intended that further action be taken in this matter at this stage.

Please note that the ACCC may act to remove the immunity afforded by these notifications at a later stage if it is satisfied that the likely benefit to the public from the conduct will not outweigh the likely detriment to the public from the conduct.

This letter has been placed on the ACCC's public register. If you wish to discuss any aspect of this matter, please do not hesitate to contact Nadia Cooke on (03) 9290 1478.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Scott Gregson', with a large, sweeping loop at the end.

Scott Gregson  
General Manager  
Adjudication Branch