

Council of Social Service of New South Wales

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The General Manager Adjudication Branch Australian Competition & Consumer Commission PO Box 1199 DICKSON ACT 2602 FILE No: DOC: MARS/PRISM:

Dear Madam/Sir

I am responding to your letter dated the 4th May 2006 regarding the Application for Revocation and Substitution lodged by the Community Care Underwriting Agency (CCUA) in relation to supply of Public Liability Insurance.

The Council of Social Service of NSW (NCOSS) does not have any objection to the ACCC revoking Authorisations A30217 and A30218 and substituting with replacement authorisations. Our position is by allowing CCUA to continue to provide public liability cover for Not for Profit Organisations (NFPOs) this will lead to increased competition in the relevant market and a greater public benefit due to increased choice of cover for Not for Profit Organisations (NFPOs). We also think that the continued operation of CCUA does not prevent other insurers within Australia or overseas from entering the market.

In conclusion, NCOSS has no objection to the ACCC varying the terms of the original Joint Venture agreement.

Yours faithfully,

Gary Moore