

Fax Transmission

Level 39  
101 Collins Street  
Melbourne VIC 3000  
Australia

BLAKE DAWSON WALDRON  
L A W Y E R S

www.bdw.com

Tel + 61 3 9679 3000

DX 187 Melbourne

Fax + 61 3 9679 3111

Date 9 November 2006

Our reference  
03-1401-9072

From Stephen Ridgeway  
Partner  
Tel: (03) 9679 3529  
Stephen.Ridgeway@bdw.com

To Attention: Tina Pigliardo/Jaime  
Norton/Kirsten Halse  
Adjudication Branch  
Australian Competition and Consumer  
Commission  
Fax: (03) 9663 3699/(02) 6243 1211

Your reference  
C2006/1868

Please see attached.

MELBOURNE  
SYDNEY  
BRISBANE  
PERTH  
CANBERRA  
PORT MORESBY  
SHANGHAI

Associated Office  
JAKARTA

Number of pages including this cover sheet 3

Please check that you have received this document in full.  
If not, please telephone the sender or call + 61 3 9679 3000.

~~Confidentiality~~

~~This document is confidential and may contain legally privileged information. If you are not a named or authorised recipient you must not read, copy, distribute or act in reliance on it. If you have received this document in error, please telephone our operator immediately on + 61 3 9679 3000 and return the document by mail.~~

H.M.

Prof ID

Doc ID 201562314\_1

**BLAKE DAWSON WALDRON**  
L A W Y E R S

---

Level 39  
101 Collins Street  
Melbourne VIC 3000

www.bdw.com

Tel + 61 3 9679 3000  
Fax + 61 3 9679 3111

DX 187 Melbourne

GPO Box 4958  
Melbourne VIC 3001  
Australia

**BY FAX**

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

Partner  
Stephen Ridgeway  
Telephone (03) 9679 3529

Our reference  
03-1401-9072

Your reference  
C2006/1868

9 November 2006

Dear Mr Gregson

**Notification (N41022) lodged by Allco Principal Finance Nominees Pty Limited under section 93 of the Trade Practices Act 1974**

We refer to your letter dated 9 November 2006 in which you asked whether Sigma Company Ltd (**Sigma**) provides a full range of pharmaceutical products to each pharmaceutical retailer who obtains discounted commercial credit from Allco Principal Finance Nominees Pty Ltd (**Allco**) and requested any other relevant information.

Under the proposed loan arrangement Sigma will not require, or attempt to influence, pharmacists to purchase particular products from Sigma's wholesale product line or recommend particular products to customers. Pharmacists will at all times continue to maintain complete discretion in relation to which products (out of Sigma's range of approximately 13,000 products) are ordered.

Sigma is contractually obliged to the Australian Government Department of Health and Ageing as a Community Service Obligation (**CSO**) Distributor to carry the entire range of Pharmaceutical Benefit Scheme (**PBS**) products, regardless of who manufactures those products (that is, whether it be Sigma or one of its competitors).

Sigma also stocks a wide range of over the counter (**OTC**) and other retail pharmacy product lines. There is minimal difference between the product lines carried by Sigma and those carried by other full-line wholesalers.

Further, the process for ordering stock is increasingly automated, with many pharmacists now ordering stock from their wholesaler via automatic portable data-entry systems. At no stage in the process does Sigma or its employees attempt to influence the choice of brand selected by the pharmacist.

MELBOURNE  
SYDNEY  
BRISBANE  
PERTH  
CANBERRA  
PORT MORESBY  
SHANGHAI

Associated Office  
JAKARTA

201561985\_2

BLAKE DAWSON WALDRON

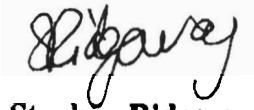
9 November 2006

Page 2

---

Please contact Stephen Ridgeway on (03) 9679 3529 if you require any further information concerning the notification.

Yours sincerely



**Stephen Ridgeway**

Partner

Tel: 9679 3529

[stephen.ridgeway@bdw.com](mailto:stephen.ridgeway@bdw.com)