



FILE No:	
DOC:	
MARS/PRISM:	

Form G

Commonwealth of Australia
Trade Practices Act 1974 --- Sub-section 93(1)

EXCLUSIVE DEALING NOTIFICATION

To the Australian Competition and Consumer Commission:

Notice is hereby given, in accordance with sub-section 93 (1) of the *Trade Practices Act* 1974, of particulars of conduct or of propose conduct of a kind referred to in sub-section 47(2), (3), (4), (5), (6) or (7), or paragraph 47 (8) (a), (b), or (c) or (9) (a), (b), (c) or (d) of that Act in which the person giving notice engages or proposes to engage.

1. (a) Name of person giving notice:

Allianz Australia Insurance Limited (ACN 000 122 850)(Allianz). N93240

- (b) Short description of business carried on by that person:

Supply of general insurance services

- (c) Address in Australia for service of documents on that person:

*Allianz Australia Insurance Limited
Level 13, 2 Market Street
Sydney, 2000*

2. (a) Description of the goods or services in relation to the supply or acquisition of which this notice relates:

Allianz is the underwriter of motor vehicle insurances (insurance) which are offered by Victoria Teachers Credit Union Limited (VTCU) ACN 087651769 to selected groups within the general public.

- (b) Description of conduct or proposed conduct:

Allianz will offer insurance with a 10% discount and provide a \$100 fuel voucher provided that a person has entered into a loan arrangement for a motor vehicle with VTCU. Purchase of the insurance or acquiring a loan is at the discretion of the person.

3. (a) Class or classes of persons to which the conduct relates

—————New and existing VTCU Members who
arrange their insurance through VTCU. |

- (b) Number of those persons:

- (i) At Present time: *Members over 18 years of age.* VTCU has approximately 77000 Members.
- (ii) Estimated within the next year: *-All Members over 18 years of age would be eligible to take advantage of the proposed conduct.*

- (c) Where the number of persons stated in 3(b)(i) is less than 50, their names and addresses:

Not Applicable

- 4. Name and address of person authorised by the person giving this notice to provide additional information in relation to this notice:

*Deborah Sorensen
Allianz Australia Insurance Limited
Level 14
2 Market Street
Sydney, NSW, 2000*

DATED *29 November, 2007*

SIGNED by/on behalf of the applicant



Deborah Sorensen

(Signature)

DEBORAH LYNDIA SORENSEN

(Full Name)

Corporate Solutions

(Description)

ATTACHMENT A

BACKGROUND

1. Allianz Australia Insurance Limited provides general insurance products and services and is an Australian Financial Services Licensee.
2. VTCU is a credit union, that provides a wide range of banking services including but not limited to loans.

PRODUCTS AND SERVICES

1. Allianz offers a range of insurance products to retail clients throughout Australia both directly and indirectly through intermediaries such as VTCU. offer loan products via general advertising to the general public or selected groups within the general public. Allianz will, through VTCU channels offer insurance products to persons. Only a person that acquires a loan with VTCU is eligible to purchase a discounted insurance and receive a \$100.00 fuel voucher. It is not obligatory for a person to purchase or acquire either products.

CHARACTERISATION OF CONDUCT

1. The conduct may contravene sections 47(6) and (7) of the Trade Practices Act 1974.

ANTI-COMPETITIVE EFFECT

1. There are many credit unions in Australia that offer vigorous competition to VCTU in the range of credit products and services. In relation to this insurance product, there are also many insurers and/or insurer's intermediaries in Australia in competition to insurance products to retail customers. Accordingly, we would submit that the markets are very competitive.
2. The notified conduct is similar to other "loyalty programs" in the broader market for the supply of retail goods and services in Australia, that have been recognised as not having an anti-competitive effect.

PUBLIC DETRIMENT

1. We would submit that there is no public detriment associated with the proposed conduct.

PUBLIC BENEFIT

1. We would submit that the proposed conduct is pro-competitive and offer benefits to the public for the following reasons:
 - a. Allianz will offer a benefit in the form of a promotional item of a petrol voucher and a discount for the purchase of insurance.
 - b. The conduct will encourage competitors of VCTU to offer similar promotional deals to consumers thereby promoting competition; and

- c. The conduct will encourage those engaged in the supply general insurance to offer to VCTU or its competitors similar promotional deal to credit unions thereby promoting competition.

CONCLUSION

For the reasons set out above, we would respectfully request that the Commission not serve a notice under section 93 (3A) of the TPA in respect of the notification.