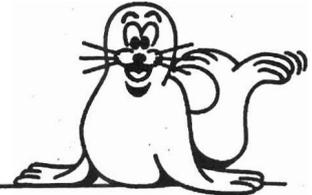


P O BOX 363
BUNGALOW
CAIRNS QLD.,
4870
ABN 98 102 603 872
Telephone: 13 14 79

SEAL-A-FRIDGE

Fridge, Freezer & Coldroom Seals. Domestic & Commercial
Mobile: 0412 154 313 Email: rrolley@bigpond.net.au



The General Manager
Adjudication Branch
Australian Competition and Consumer Commission
PO Box 1199
DICKSON ACT 2602

May 30th, 2007.

Re. Exclusive Dealing notifications lodged by Seal-A-Fridge Pty Ltd and others.

In our submission dated Jan. 2nd, 2007 the following clause was included.

- a. The average fridge seals on a 2 door domestic refrigerator require about 13 metres of material. (Rubber and magnet combined). The total cost of this material is about \$11.00. If the maximum discount of 15% quoted by SAF is available then we are looking at a saving of approx. \$1.65. If 5% is available then the saving is less than .60c per customer. Assuming this 'saving' is passed on to end users we cannot see this as being of any real savings benefit to end users.

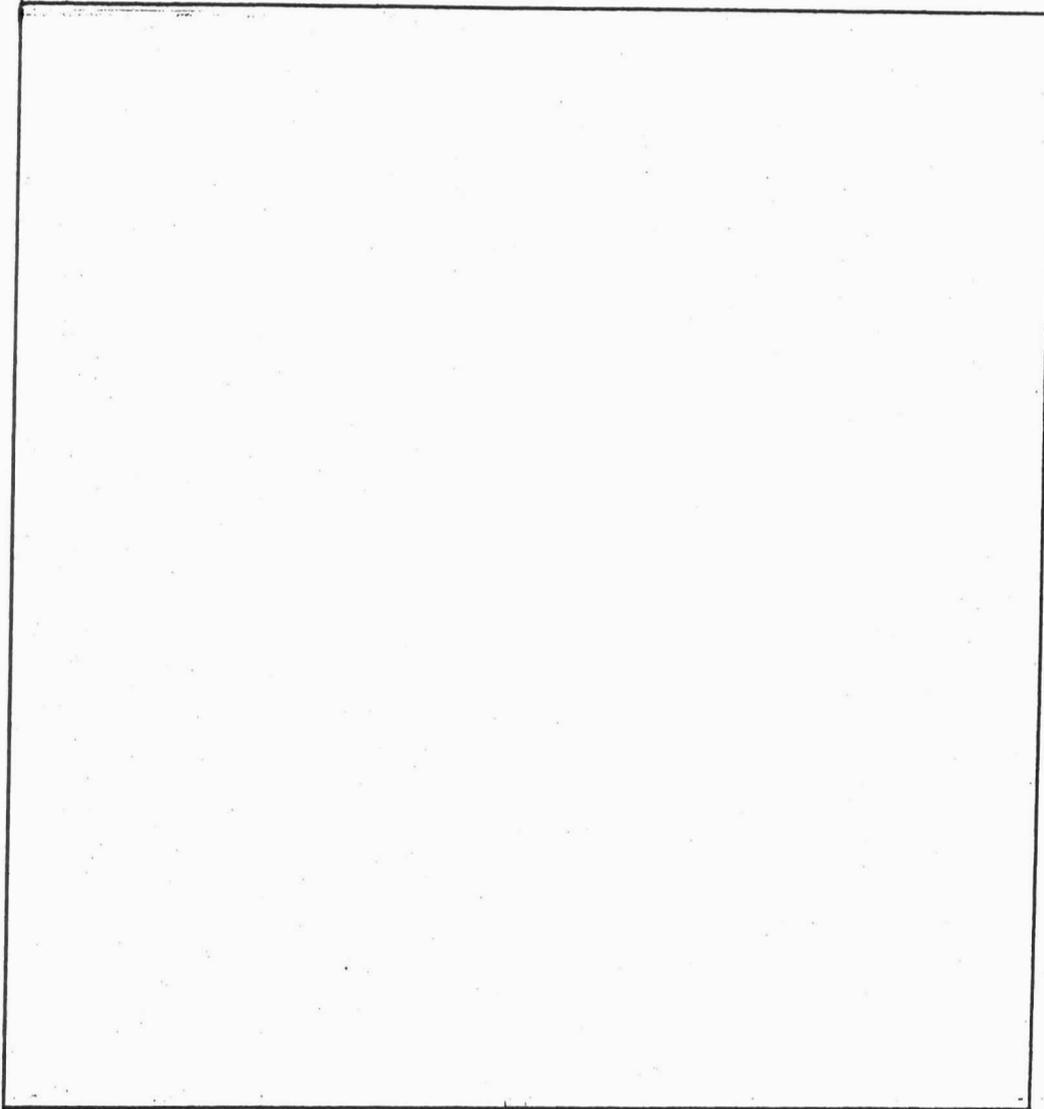
It seems there is a belief that SAF Franchisees have huge profit margins available as the material cost is approx. 10% on an average reseal job. It follows that these huge margins allow Franchisees 'room to move' in day to day operations. If this belief were to be held by any person within the ACCC then it may lead to decisions that are inaccurate and unfair unless additional information regarding the total cost of an average operation is considered.

In the interests of completeness and accuracy we submit the following estimate.

Assumptions and assertions:

1. The sales figure of \$117,000.00 is used as a 'base starting point' with all other figures portrayed as a factual % of that base. This 'starting point' computes to an average \$464.29 in sales for ALL 252 working days in a normal trading year.
2. The operation is staffed by only one person ON A MINIMUM SALARY.
3. All other expenses have been geared to the sales base.
4. This sales base, if achieved by one person, would be a highly commendable effort.

**EXCLUDED FROM
PUBLIC REGISTER**



Yours sincerely,

Robert Ross Rolley Date 30.05.2007

Lynette Margaret Rolley Date ..30.05.2007

**Robert Ross and Lynette Margaret Rolley
Franchisee
Seal-A-Fridge (Cairns)**