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AANA

SUITE 2, LEVEL 5
99 ELIZABETH STREET
SYDNEY 2000
T (02) 9221 8088
F (02) 9221 8077
E admin@aana.com.au
W www.aana.com.au
ABN 54 003 179 673

17 January 2007

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

Dear Sir,

Ref: A30244, A30245 – Application for Approval – MAV on behalf of Victorian Councils

On behalf of the Australian Association of National Advertisers, I thank you for the invitation to make this submission in relation to the draft determination as above.

Having championed the just cause of open and fair competition in the advertising marketplace for 79 years, the AANA opposes the restrictive trade action represented by the draft determination.

The protection from action under the Trade Practices Act 1974 afforded to Victorian councils under this determination is clearly anti-competitive, and has the potential to disadvantage advertisers.

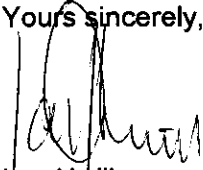
While outdoor advertising is a relatively small component of an Australian marketing communications industry expected to invest upwards of \$30 billion dollars this year, it is nonetheless an important and expanding channel of communication between our members and their customers.

It is the view of the AANA that any action that reduces competition in this channel must be to the disadvantage of consumers as well as the commercial interests seeking to afford them the maximum amount of product and service choice.

It is our view, also, that in this particular instance, the interests of the broader community will best be met by the ACCC encouraging—and ensuring—open and fair competition.

The AANA will be pleased to provide a representative to speak to this submission at any time.

Yours sincerely,



Ian Atwill
Chairman

