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

Dear Mr Gregson

**RE: ROYAL AUSTRALIAN COLLEGE OF GENERAL PRACTITIONERS (RACGP)  
A91024 - APPLICATION FOR REVOCATION AND SUBSTITUTION**

Thank you for your letters of 3 January 2007 and 20 December 2006 regarding the application for revocation of authorisation A90795 and its substitution by a new authorisation A91024 lodged by the Royal Australian College of General Practitioners (RACGP). I have noted the updated information you have provided.

It is my opinion that the intra-practice price setting process for General Practices is of benefit to the consumers of General Practice and contributes to equitable access to services. However, I am concerned that the needs of lower income clients at times may not be met through this process. I would like to see a greater effort from RACGP to address the needs of this cohort through setting of fee structures that do not burden the socially, economically, linguistically or culturally disadvantaged.

With regard to the proposed authorisation of all GPs (and OMPs) within a single practice to agree on fees they charge as VMOs to a public hospital, in South Australia these fees are determined by the Department of Health for all General Practitioners in rural areas of the State. There is therefore no opportunity for practices to set their own fees for public hospitals in South Australia.

Thank you for the opportunity to provide comment on this application.

Yours sincerely

**DR TONY SHERBON**  
Chief Executive

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