



271108 4500 TPL

27 November 2008

Dr. Richard Chadwick  
General Manager  
Adjudications Branch  
Australian Competition and Consumer Commission  
GPO Box 3131  
Canberra, ACT 2601

Dear Richard,

**Australian Medical Association Limited and State/Territory AMA Organisations Application for Authorisation A91100 – Submission on Draft Determination**

Thank you for providing the Australian Society of Anaesthetists with the opportunity to review the draft determination (A91100) with respect to the Australian Medical Association (AMA) request for authorisation to collectively negotiate on behalf of rural general practitioners to provide services as visiting medical officers (VMO) in public hospitals and health facilities in rural and remote Australia (except NSW).

The Australian Society of Anaesthetists fully endorses the comments and observations made in the draft determination by the ACCC. The draft determination recognises the pragmatic realignment of bargaining power between individual general practitioners in rural and remote Australia with their ability to negotiate service agreements with public health facilities. The Society also recognises the applicability of the authorisation is only to rural and remote Australia which ensures equity and is unlikely to affect competition in areas which naturally lack large numbers or even small numbers of medical practitioners to provide services.

The collective negotiation model described in the authorisation is again supported. It imposes no obligation on either part to enter negotiations nor conclude negotiations if the outcome is seen to lack mutual satisfaction.

The ASA therefore fully endorses the authorisation as being one of the practical ways in ensuring appropriately remunerated rural and remote medical practitioners.

Yours sincerely,

Peter Lawrence  
**EXECUTIVE DIRECTOR**

---

*The ASA... representing Australian Anaesthetists, since 1934*

t 02 9327 4022 | f 02 9327 7666 | [asa@fed.asa.org.au](mailto:asa@fed.asa.org.au) | [www.asa.org.au](http://www.asa.org.au) | ABN 16 095 377 370  
Suite 603, Eastpoint Tower, 180 Ocean Street, Edgecliff NSW 2027 | PO Box 600, Edgecliff NSW 2027