



30 July 2008

By email: adjudication@accc.gov.au

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

Dear Sir/Madam

**Notification of intention to attend pre-decision conference
Insurance Council of Australia application for authorisation A91086**

We write to notify the Australian Competition and Consumer Commission (**ACCC**) of our intention to attend the pre-decision conference in relation to the ACCC's draft determination in respect of the application for authorisation lodged by the Insurance Council of Australia (**ICA**) on 20 March 2008, to be held on 4 August 2008.

Our organisations have an interest in this matter due to our concerns that the ICA's proposal for a common definition of "inland flood" will potentially restrict competition by preventing insurance product differentiation, while at the same time providing little if any benefit to consumers and potentially causing further detriment. We will provide further written submissions regarding our concerns shortly. Further, we note that we were not made aware of the ICA's application in a timely manner and are very concerned at the lack of consultation with consumer representatives regarding the proposal to this stage.

Our organisations, who wish to attend the pre-decision conference, are:

Organisation	Spokesperson	Email address
Consumer Action Law Centre	Nicole Rich	nicole@consumeraction.org.au
West Heidelberg Community Legal Service	Denis Nelthorpe	denis.nelthorpe@iinet.net.au
Consumers' Federation of Australia	John Berrill	jberrill@mauriceblackburn.com.au
Legal Aid New South Wales	David Coorey	David.Coorey@legalaid.nsw.gov.au
Legal Aid Queensland	Catherine Uhr	cuhr@legalaid.qld.gov.au
Consumer Credit Legal Centre (NSW)	Katherine Lane	Katherine.Lane@clc.net.au

Consumer Action Law Centre
Level 7, 459 Little Collins Street
Melbourne Victoria 3000

Telephone 03 9670 5088
Facsimile 03 9629 6898

info@consumeraction.org.au
www.consumeraction.org.au

Please note that Consumer Action Law Centre, West Heidelberg Community Legal Service and the Consumers' Federation of Australia wish to attend the pre-decision conference at the ACCC's Melbourne office, while Legal Aid New South Wales and the Consumer Credit Legal Centre (NSW) wish to attend from the ACCC's Sydney office. Legal Aid Queensland requests that the ACCC offer a video link from its Brisbane office to enable it to attend the conference.

Please contact us on 03 9670 5088 (Consumer Action) or via our email addresses if you have any questions.

Yours sincerely

CONSUMER ACTION LAW CENTRE



Nicole Rich
Director – Policy & Campaigns

Also on behalf of:
Denis Nelthorpe
West Heidelberg Community Legal Service

John Berrill
Consumers' Federation of Australia

David Coorey
Legal Aid New South Wales

Catherine Uhr
Legal Aid Queensland

Katherine Lane
Consumer Credit Legal Centre (NSW)