



**vision australia**

blindness and low vision services

ACCC  
Adjudication Branch  
ACCC ref: C2009/1399

13 November 2009

Dear Mr Jones,

Cuscal Limited, National Australia Bank Limited and rediATM network members applications for authorisation A91175-A91177 - draft determination

Vision Australia would like to thank the ACCC for their invitation to provide comment on the Draft Determination to the proposed authorisation by the applicants CUSCAL, NAB and rediATM network members. In reviewing the Draft Determination, Vision Australia herewith seeks the opportunity to further provide comment to the ACCC on this matter orally at a Pre-determination Conference.

Vision Australia considers that the views of consumers who are blind or who have low vision have not adequately been articulated under the potential public detriments section of the Draft Determination. We therefore believe that an opportunity to address the review board in person will assist the ACCC in more accurately assessing the balance between the potential public benefits and detriments arising from the proposed authorisation.

Should the ACCC consider it appropriate for the applicants to be present at the pre-determination conference, Vision Australia would welcome the opportunity to express our concerns to the applicants also. We are able to accommodate by attending a conference at the ACCC's convenience at a venue in either Melbourne or Sydney.

We await the ACCC's response to this request and again thank you for this opportunity.

Yours sincerely,

Brandon Ah Tong-Pereira  
Policy Officer

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