

NEWS LIMITED

1 April 2009

Mr Darrell Channing
Director
Adjudication Branch
Australian Competition and Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2601

FILE No:

DOC:

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BY FACSIMILE: 6243 1199

Dear Mr Channing

**Application for Authorisation A91117 lodged by
Queensland Newsagents Federation Ltd ("Application")**

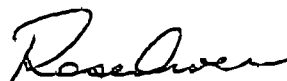
I refer to the Commission's draft determination in relation to the Application.

We agree with the Commission's position that it is essential to ensure the net public benefit by imposing conditions on the granting of the authorisation. In this respect, we note in particular condition 5 which we believe represents the minimum requirement which should be imposed in relation to members of the applicant organisations to be represented in collective negotiations. We note that the authorised conduct in relation to non-members is only for those who "ask" to participate. While we agree with this concept, we believe the request should need to be made in writing. This could either be addressed in the terms and parameters of the authorised conduct or in conditions.

While we may not agree with all the statements made in the Application or draft determination, we have no further comments or objections in relation to the draft determination.

For further communications in relation to this matter please contact me directly by email to owenr@newsLtd.com.au or by phone on (02) 9288 3107.

Yours sincerely



Rose Owen
Legal Counsel

