



22 January 2009

Dr Richard Chadwick
General Manager
Adjudication
ACCC
GPO Box 3131
Canberra City
ACT 2601

Dear Dr Chadwick

RE: Queensland Newsagency Federation Application for Authorisation A91117.

NDD Distribution P/L is actively involved in Non-Prescribed Voluntary Code of Conduct discussions, along with distributors Network (ACP), Gordon & Gotch and retail representatives Australian Newsagency Federation (ANF). The discussions are being facilitated by the ANF, and we are led to believe the process and content of the meetings comply with ACCC requirements.

The purpose of the Code of Conduct is to review newsagency channel problems and provide supply chain solutions - from publisher to retailer. It is therefore impractical for magazine distributors to work with other state based newsagency representative bodies, or agree to collective bargaining approaches.

It is suggested the applicants consult with the ANF, as representatives for newsagents nationally, to ensure they are included as part of the process.

In addition we are assuming the named "targets" within the submission include Network Services as part of ACP and it seems very selective that an individual mid range publisher, Universal Magazines, has been named where other publishing companies of the same size or larger have been excluded.

Sincerely

A handwritten signature in black ink, appearing to read 'Mark Darton', is written over a light grey rectangular background.

Mark Darton
General Manager

NDD Distribution Pty Ltd

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