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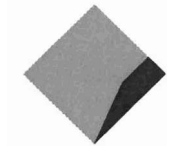
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Business Products and Development
Business and Private Banking

7 August 2009

Ms Sue Philp
Director
Adjudication Branch
Australian Competition and Consumer Commission
GPO Box 520
MELBOURNE VICTORIA 3001



By Email to: adjudication@accc.gov.au

Dear Ms Philp

Australian Payments Clearing Association Limited: Applications for Revocation and Substitution Authorisation A91153 to A91154 – Interested Party Consultation

Your Reference: C2009/1325

Thank you for your letter of 20 July 2009 seeking our comments on the above referenced applications. We appreciate this opportunity to provide our views.

The Commonwealth Bank (the Bank) supports the applications lodged by the Australian Payments Clearing Association (APCA) in relation to the Consumer Electronic Clearing System (CECS) Regulations and Manuals. The Bank is an active member of all APCA clearing systems – including CECS.

The Bank endorses APCA's views that the public benefits in support of these applications exceed any detriments. Specifically, we support:

- The need for secure and efficient processing of transactions between financial institutions, as facilitated by CECS;
- Access arrangements that underpin CECS;
- The importance of risk mitigation and the integrity of clearance and settlement, as provided by CECS; and
- The overall importance of CECS integrity and efficacy as afforded by existing CECS procedures.

As we have indicated to the Commission in the past, we remain of the view that *“APCA is the appropriate forum for the setting and development of technical and operational rules, and that maintenance and enhancement of the integrity and efficiency of the ATM and EFTPOS networks, along with the protection of the integrity and finality of settlement, will be assisted by the Commission’s favourable consideration of the APCA applications”*¹.

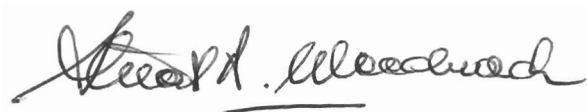
¹ Commonwealth Bank letter to ACCC dated 24 July 2003 – re Applications A30228 and A30229.

The Bank therefore supports these current applications for revocation and substitution of these Authorisations.

We understand that a copy of this letter will be placed on the ACCC's public register.

Thank you again for the opportunity to comment on this matter; we look forward to learning of a favourable outcome of the Commission's deliberations. Any enquires in the interim should be directed to the undersigned.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Stuart Woodward". The signature is written in a cursive style with a horizontal line underneath the name.

Stuart Woodward
General Manager
Representation