

Blind Citizens Australia



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Submission to Australian Competition and
Consumer Commission on Cuscal, National
Australia Bank and rediATM application
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Contact:

Wayne Hawkins

National Policy Officer

Blind Citizens Australia

Ph. (02) 9744 9844

Mob. 0437 355 985

wayne.hawkins@bca.org.au

About Blind Citizens Australia

Blind Citizens Australia (BCA) is the peak national representative organisation of and for people who are blind or vision impaired. Our mission is to achieve equity and equality by our empowerment, by promoting positive community attitudes, and by striving for high quality and accessible services which meet our needs. As the national advocacy peak body we have over 3000 individual members, branches nationwide and 13 affiliate organisations that represent the interests of blind or vision impaired Australians.

As such, it is important for BCA to advocate for equality in areas of community participation and social inclusion for all Australians who are blind or vision impaired.

Introduction

Blind Citizens Australia is pleased to have the opportunity to comment on the application made to the Australian Competition and Consumer Commission (ACCC) by Cuscal, National Australia Bank (NAB) and rediATM network, on behalf of their proposed partnership, requesting authorization;

- about the deployment of ATMs in the rediATM Network
- to not directly charge cardholders of members of the rediATM Network for the supply of ATM transaction services at a rediATM
- to not charge cardholders of non-members of the rediATM Network a direct charge fee which exceeds the Maximum Direct Charge for the supply of ATM transaction services at a rediATM as set by Cuscal in consultation with the members of the rediATM Network

- to refuse to give a discount to a foreign cardholder in relation to the supply of ATM transaction services at a rediATM

Whilst Blind Citizens Australia understands the rationale underpinning the competitive marketplace, we contend that the social, economic and cultural rights of individuals must come before commerce.

People who are blind and vision impaired face many difficulties when trying to access the same ATM facilities as their sighted counterparts. Regardless of where an ATM is located, people who are blind or vision impaired first need to know that it is there and then be able to reach it independently before it can be used.

For people who are blind or vision impaired to access an ATM, it must be enabled to provide audio output. This means that the appropriate software must be installed, activated and maintained, and the public must be given clear information about where audio enabled ATMs are located

Many people who are blind or vision impaired have low incomes and any additional costs in their budget will be difficult to manage.

As a result of these factors, the direct charging for people who are blind or vision impaired who are not NAB cardholders or members of the rediATM network will be unduly disadvantaged

Given these significant concerns the proposed joint venture between NAB and Cuscal, the managing entity of rediATMs, has the potential to impose very real negative impacts on ATM users who are blind or vision impaired.

Concerns

Blind Citizens Australia is concerned that the proposed partnership may cause significant access issues for people who are blind or vision impaired, which will in turn create significant barriers to everyday living. Under the Disability Discrimination Act 1992 (Cth) the provision of goods and services must be accessible to people with disabilities without causing them disadvantage. Blind Citizens Australia is concerned that this proposed partnership may well lead to people who are blind or vision impaired becoming unwitting victims of widespread indirect discrimination

One of the goals of direct charging is to provide transparency and competition for consumers. If a sighted member of the public wishing to use an ATM does not wish to pay the required fee for the transaction, they can look for another ATM with a lower fee. However, people who are blind or vision impaired do not generally have the luxury of being able to independently search for another ATM. This is because people who are blind or vision impaired are oriented to one or two machines they can use. This usually requires time spent with a specialist orientation and mobility instructor who will teach the person the route to and from the ATM so that the person can find it both safely and independently. Often the choice of ATM is limited by whether they are in an accessible and safe location and if the ATM itself is audio enabled. It is often not possible to find an ATM for the person's bank, or network of choice which meets these criteria.

While Blind Citizens Australia understands that there will be advantages for some NAB cardholders as a result of this proposed partnership; in that they will have access to a greater number of charge-free ATM machines, NAB

cardholders who are blind or vision impaired will not reap any benefit, and may in fact be disadvantaged from this proposed partnership and increased network of ATM machines.

At present none of the rediATM network machines are audio enabled; a functionality which is essential in order for ATM machines to be accessible to cardholders who are blind or vision impaired.

Additionally Blind Citizens Australia is particularly concerned by the provision in the applicant's submission which states that Cuscal, as managing entity of the rediATM network will be solely responsible for the assessment and determination of current and future ATM deployment. Given that the overarching premise and planned outcomes of this partnership is to increase the geographic footprint of the rediATM network, there exists the very real probability that NAB's audio enabled ATM machines may be redeployed from current locations, thus depriving NAB cardholders who presently have access to those NAB audio enabled ATM machines the ability to independently conduct banking transactions free of direct charges.

Blind Citizens Australia acknowledges that some current rediATM cardholders who are blind or vision impaired will benefit from having access to NAB audio enabled ATM machines; this benefit will not however, offset the disadvantages imposed on existing NAB cardholders who are blind or vision impaired.

Recommendations

Firstly, in order to ameliorate the disadvantages this proposed partnership imposes on NAB cardholders who are

blind or vision impaired, Blind Citizens Australia recommends that there be a waiver of all direct charges for all NAB and rediATM network cardholders who are blind or vision impaired until the entire network of ATM machines are audio enabled.

Secondly, Blind Citizens Australia recommends the ACCC disallow any redeployment of NAB audio enabled ATM machines as this would impose significant disadvantage to those people who are blind or vision impaired and who are currently being provided accessible and independent banking services. Therefore, in any area or location in which exists a duplication of NAB and rediATM machines, Blind Citizens Australia recommends that it should be the non audio enabled rediATM machine that be redeployed.

Blind Citizens Australia contends that the ACCC should not permit any enterprise to favour one group of consumers at the disadvantage of another group of consumers.