



25 August 2009

Ms Sue Philp  
Director, Adjudication Branch  
Australian Competition & Consumer Commission  
GPO Box 520  
MELBOURNE VIC 3001

Dear Ms Philp

**Cuscal Limited, National Australia Bank Limited and rediATM network  
members applications for authorisation A91175-A91177  
- interested party consultation**

Thank you for the opportunity to comment on the applications for authorisations sought by the abovementioned parties.

Customers Limited is an independent ATM deployer and ATM service provider, providing around 21% of ATMs currently operating in Australia, as such we have a keen interest in developments within the ATM industry.

In the applications before the Commission, the applicants have attempted to highlight the public benefits which would accrue from the proposed conduct, however their assessment appears to be limited directly to the benefits that their own members and customers will receive, rather than a wider public benefits test.

Importantly, the proposed conduct could influence the decisions of an estimated 20% of all debit card holders, based on the combined cardholder base of the applicants, as to how and where they access cash via the ATM network. The future behaviour of this group of debit card holders is likely to produce ramifications for the wider ATM network and may well have implications for all cardholders.

We are concerned that the authorisation of the applications may potentially set a precedent for other large financial institutions to follow which may have an unintended impact on the operation of the ATM system and reverse some of the progress made through the introduction of the ATM reform package in March 2009, including the Reserve Bank's Access Regime for the ATM System. However, this appears to be more within the bailiwick of the Reserve Bank and the Payments Systems Board rather than the Commission.

Customers ATM Pty Limited ABN 94 123 623 165  
ATM Solutions Australasia Pty Limited ABN 87 097 550 519  
Customers Operations Pty Limited ABN 57 112 325 934  
ATM Express Pty Limited ABN 36 105 674 520  
Autocard ATM Australia Pty Limited ABN 56 109 635 510

**Members of the Customers Limited Group**

**ATM National Customer Service**  
**1300 305 600**

**Client Support Services**  
**1800 301 100**

**ATM Sales and Administration**  
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Cheltenham VIC Australia 3192  
Phone: 1300 305 600  
Fax: 1300 721 883

**ATM Operations**  
1, 148 Chesterville Road  
Cheltenham VIC Australia  
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Customers Limited have reviewed the applications and wish to advise that it does not propose to make a detailed submission at this time, and will leave it to the Commission to address matters of competition law and the likely public benefits, or otherwise, that might result from the approval of the applications.

Yours sincerely,

**Tim Wildash**  
Chief Executive Officer and Managing Director  
Customers Limited

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