

**Authorisation application A91232 & A91233 lodged by Suncorp
Metway Ltd and Bendigo and Adelaide Bank Ltd**

ORAL SUBMISSION

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**Consumer Action Law Centre
Nicole Rich, Director – Policy and Campaigns**

This record is not intended to be a verbatim account of the submission but a summary of it. A copy of this document will be put on the ACCC's public register.

The Consumer Action Law Centre expressed the following views.

It is generally supportive of Suncorp-Metway Ltd's and Bendigo & Adelaide Bank Ltd's application for authorisation.

Direct charging for Automated Teller Machine transactions is a pro-competitive reform. It allows consumers to see what the charge will be and make a conscious decision and this is positive.

A consequence of the reforms is that larger financial institutions with larger ATM networks are at an advantage. They can attract customers because it is easier to avoid the direct charge through these networks. It is harder for smaller institutions to compete as it is legitimate for consumers to switch providers based on the availability of direct fee free services.

However, there might be less upfront and apparent reasons for it being advantageous for consumers to use smaller institutions – and these institutions are a competitive constraint on larger institutions. It is reasonable for smaller institutions to enter into the type of arrangements Suncorp and Bendigo & Adelaide have proposed as they allow smaller institutions to compete with larger ones.

Such arrangements might involve agreements resulting in the inclusion of some consumers and the exclusion of others with regards to one feature of the financial services package. However, the package includes many other products and services and allowing institutions to make such agreements as the one for which authorisation is sought allows continued competition across the wider basket of products and services.

(ends)