

Our Ref: H10/43258

Dr Richard Chadwick
General Manager
Adjudication Branch
Australian Competition & Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

FILE No:
DOC:
MARS/PRISM:

Dear Dr Chadwick

Re: Vision Group Holdings Limited application for authorisation A91217 – draft determination.

Thank you for the opportunity to make a submission on the above matter.

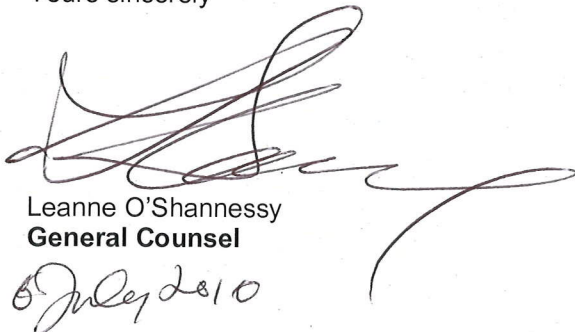
Laser Vision correction surgery is not performed in the public sector and changes to fee arrangements for these procedures would appear to have limited impact on public health services.

Cataract surgery is performed in both the public and private sector. Patients in the private sector are referred to a named doctor, with patients able to contact a specialist's rooms to ascertain the price of a consultation and procedures. It is considered that there may be limited advantage to patients knowing that all ophthalmologists within that practice charge the same fees.

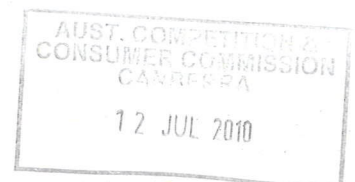
It is noted however, that the public benefit suggested in the application seems only to eventuate if any financial benefits savings through discussion, agreement and implementing of fees are passed onto patients/clients. It is noted that there is no requirement for this to occur, and that the Group may also increase their fees, which may be contract to the public interest. In short, the public benefit based solely on the premise that fees may decrease appears to rest on a discretion to pass such savings on.

If you wish to discuss further, I can be contacted on (02) 9391 9602.

Yours sincerely



Leanne O'Shannessy
General Counsel
6 July 2010



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