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08 October 2010

Darrell Channing
Director
Adjudication Branch
ACCC
GPO Box 3131
CANBERRA ACT 2601

Dear Mr Channing

**BRISBANE MARINE PILOTS PTY LTD APPLICATION FOR
AUTHORISATION A91235- Draft Determination**

Shipping Australia Limited (SAL) appreciates the opportunity to make comments on the 'draft determination' in respect of the above application.

Members of SAL fully support the determination made by the ACCC denying authorisation for an exclusive arrangement between Brisbane Marine Pilots and Maritime Safety Queensland in relation to the provision of pilotage services at the Port of Brisbane.

We concur with the view that loss of potential competition, which could result from the proposed agreement, is likely remove an incentive for other providers to offer pilotage services, and will be detrimental.

Yours sincerely

A handwritten signature in black ink, appearing to read "Michael Phillips".

Michael Phillips
Chairman
Shipping Australia Limited

