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2 March 2011

Mr Richard Chadwick
General Manager
Adjudication Branch
ACCC
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Sent via email: Richard.chadwick@acc.gov.au

Energy Assured Limited Application for Authorisation A91258 & A91259

Aegis Direct welcomes the opportunity to provide feedback on the application for Authorisation made by Energy Assured Limited for the introduction of a self regulatory code for the conduct of door to door sales in the energy industry.

Aegis Direct is a business that specializes in door-to-door and promotional selling. The business is operated by its management who has brought together a team of sales specialists with years of experience in door-to-door and promotional sales outsourcing. Since our establishment in 2004, we have developed a reputation for working in partnership with our clients to deliver consistently excellent sales and quality outcomes.

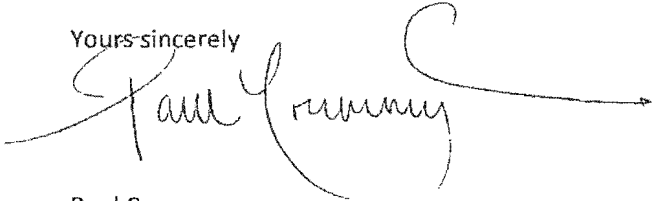
The use of door to door sales in energy retailing is regulated by State retail energy Marketing Codes, while consumers also enjoy the protections afforded by the Australian Consumer Law (ACL). The Energy Assured Sales Code of Practice will complement existing regulation, by providing consumers with comfort that the energy industry has a consistent and standardised approach for the training and recruitment of door to door sales agents; the tracking and registering of sales agents accreditation through a formal process; and a framework to deregister Agents from the registry as well as apply sanctions to Members for non compliance.

Whilst there are a range of public benefits that have been previously identified in various submissions, and no known public detriments, Aegis strongly supports that the Code will:

- introduce public benefits through the establishment of an industry central register and its various Accreditation statuses. Where proven breaches are recorded on the register, allowing members to review a sales agent's accreditation history at recruitment, which prevents deregistered agents moving between members, or the recruitment of Sales Agents that persistently breach the Standards;
- ensure a level playing field amongst industry participants through a standardised recruitment, training, assessment and monitoring regime. Where breaches, systemic and compliance issues are uniformly applied to the sales agent, the energy retailer or energy marketer; and
- provide consumer confidence as the constant monitoring procedures proposed under the Code that will allow for earlier identification to compliance or systemic issues that can be addressed.

Aegis recommends that the ACCC authorises the revised application before it, as the Code once established will provide a net public benefit.

Yours sincerely

A handwritten signature in black ink that reads "Paul Crummy". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Paul Crummy
Associate Vice President
Aegis Direct