



**Australian
Competition &
Consumer
Commission**

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Mr Peter Armitage
Partner
Ashurst Australia
By email: peter.armitage@ashurst.com

Ms Georgina Foster
Partner
Baker & McKenzie
georgina.foster@bakermckenzie.com

Dear Mr Armitage and Ms Foster

Visa Worldwide Pte Limited & Ors – application for authorisation – A91379 & A91380 – submissions received in relation to Draft Determination

The Australian Competition and Consumer Commission (the ACCC) has issued a draft determination in respect of the application for authorisation lodged by for authorisation lodged by Visa Worldwide Pte Limited, Visa AP (Australia) Pty Ltd and MasterCard Asia/Pacific Pte Ltd (collectively, the Applicants) on 4 July 2013.

The ACCC has received a number of public submissions relating to the Draft Determination including the following:

- Australian Small Business Commissioner
- Commonwealth Bank of Australia
- Alzheimer's Australia
- Mr Lee Urbon
- Ms Lara Friedman
- Mr Robert Payne
- Mr John W Sanders
- A pharmacist from Western Australia.

These submissions have previously been provided and will be available on the public register.

These submissions broadly raise the following issues

- As a participating financial institution, the Commonwealth Bank of Australia objects to the provision of the application which provides that the scheme rules may allow for signature cards in certain circumstances.
- The other submissions are from interested parties who are concerned about the removal of signature as a method of authentication and the effect this will have upon particular groups in the community including the elderly and those with particular medical conditions.

The Applicants have previously submitted that individuals who are unable to use PINs due to special circumstances, such as a medical condition, will be able to continue to sign for purchases after the change to mandatory PINs. In light of the submission from the Commonwealth Bank of Australia and the concerns expressed by a number of individuals and community groups, the ACCC would like further information regarding how these individuals will be accommodated following the move to mandatory PINs.

In particular, the ACCC seeks further information from the Applicants regarding how the card schemes, financial institutions and merchants will work together to ensure that individuals who are unable to use PINs are not disadvantaged by the proposed changes.

The ACCC would appreciate your response to these submissions by **22 November 2013**.

This letter has been placed on the ACCC's public register. If you wish to discuss any aspect of this matter please do not hesitate to contact Hayley Parkes on 03 9290 6926.

Yours sincerely



Marie Dalins
Director
Adjudication Branch