

5 December 2013

The Director  
Adjudication Branch  
Australian Competition and Consumer Commission  
GPO Box 3131  
Canberra ACT 2601



Refer: Ms Hayley Parkes

By Email to: [hayley.parkes@accc.gov.au](mailto:hayley.parkes@accc.gov.au)

Dear Ms Parkes,

## **Visa Worldwide Pte Limited & Ors - Applications for Authorisation A91379 & A91380**

I refer to the Commonwealth Bank's previous submissions of 17 July 2013 and 1 November 2013 in relation to the above matter, and our more recent telephone conversations in relation to "Excluded Card Types". The Commonwealth Bank (the Bank) is pleased to lodge this supplementary submission to clarify the Bank's expected approach to ensure that our customers who are unable to use a PIN with a credit card, remain able to transact appropriately.

In our earlier submission of 1 November, we stated support for the intent of the then draft definition of "Excluded Card Types", but noted concerns around the practical application of that definition and its lack of clarity. Since that time we have suggested to the Applicants that an improved definition would provide greater, and essential, clarity for all participants and would act to minimise the potential for inadvertent consequences.

We now understand that MasterCard has approached financial institution members of the Steering Committee with the suggestion that "Excluded Card Types" be defined on the following basis:

*"A cardholder will be eligible for a signature based card verification method if he / she provides to their Bank [Financial Institution] a medical certificate signed by a registered medical doctor certifying that the cardholder has a medical condition preventing them utilising a PIN as a card verification method."*

While the status of MasterCard's engagement with other Committee member institutions is unknown, the Bank believes that such a definition is a vast improvement on the current proposed approach.

Should the approach to "Excluded Card Types" as proposed by MasterCard be endorsed, the Bank proposes to offer affected customers a range of options, including an exception process for cardholders with special needs to be able to continue to sign for credit card purchases. This, we believe, is consistent with our ongoing desire to offer appropriate products and services to our broad customer base.

We are currently in the process of scoping the necessary systems and operational changes required to support such an exceptions process. In parallel, the Bank will continue to work with the broader industry to develop a consistent exception process and a timeline that is realistic for implementation.

In summary, the Bank supports a definition similar to that now being proposed by MasterCard. On that basis, ACCC authorisation of this initiative remains appropriate.

The Bank remains willing to further discuss these matters with you at any time, and to this end please feel free to contact the undersigned.

Yours sincerely,

*[Signed]*

Stuart Woodward  
General Manager  
Representation