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**From:** Alumbra Admin  
**Sent:** Friday, 24 May 2013 3:54 PM  
**To:** Registers, Public; Adjudication;  
**Subject:** TRIM: APRA Submission

Dear Sirs,

Please find below concerns that we would like to have addressed about the way APRA is conducting itself before it's application is approved for another term

Not only has this company increased its licencing fees on numerous occasions over the past 5years, it did so without informing licensees why, therefore denying us the right to dispute these increases .

We are a business with over 100 employees and can not afford to pay these ongoing rises, that cannot be justified. By the year 2015 APRA are proposing to increase the costs per head, up to \$1.05 which is over a 50% increase since 2008. This is a prosperous amount and will put many companies out of business.

Similar collection societies in other countries charge there licensees considerably less money, and without the threat of on going rises. APRA is taking advantage of being the front runner in the Australian industry with no competitors to keep their fees in check.

APRA's 2011/2012 annual accounts show that \$175 million in revenue was collected of which only \$22 million was received from their overseas affiliated collection societies, yet they are unclear on how much they are paying these overseas associations. This is money collected from Australasian businesses.

We agree with the view that the ACCC should request that the Commonwealth Government conducts a formal enquiry into the feasibility and merits of forcing APRA and PPCA to merge. Stopping doubling up on costs and creating a clearer structure of operation and fee proposal. Ideally, the copyright system should be opened up to competition so that the hospitality industry can shop around for the best deal, and can so in the knowledge that they are more effectively supporting the Australasian music industry and Australasian economy.

It has also come to our attention that APRA are sending out covert operatives, without notifying the licensees. Who are paying door fees and entering venues to spy on the businesses operations. This behaviour is totally inappropriate and doesn't encourage a feeling of trust or professionalism.

These points really need to be considered and addressed before any application is approved. As the only competitor in this field APRA are abusing their position and by passing a 6 year term this will only increase the problem.

Sincerely

Simon Digby | Director

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