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1 November 2014
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The General Manager
Adjudication Branch
Australian Competition & Consumer Commission

Dear Sir/Madam

**W.A.T.A.B. AGENTS' Association Incorporated application for authorisation A91463
Interested Party Consultation - Your Ref: 56114 dated 31 October 2014**

We make this submission as a member for 48 years of the W.A.T.A.B. Agents Association in support of this Application for authorisation lodged by the Association on 29 October 2014.

The Association is seeking authorisation for ten years on behalf of present and future members, to collectively bargain with Racing and Wagering Western Australia (RWVA) or any entity which holds the licence to conduct off-course totalisator operations for the purpose of section 4 of the Racing and Wagering Western Australia Act 2003.

The Association proposes negotiating with RWVA about the terms and conditions of the provision of services by Association members to RWVA including the appointment, extension or renewal of a contract or arrangement for the provision of those services. The Association also seeks to participate in resolving disputes (as referred to the Disputes Review Committee) between RWVA and an Agent or Agents.

We support the Association's application for interim authorisation to commence negotiations with RWVA immediately while the ACCC is assessing the substantive application for authorisation.

It is our experience that the relationship between us as Agents and RWVA, under the previously authorised collective bargaining arrangement, has been extremely positive.

Collective bargaining will generate public benefits by improving the efficiency of the bargaining process by lowering the time and substantially reducing the cost of negotiating contracts relative to undertaking a series of separate individual negotiations. In addition Agents, through the Association, share the cost of obtaining professional advice resulting in contract terms and conditions delivering improved incentives and efficiency.

Participation in the arrangement is voluntary.

There is no collective boycott involved.

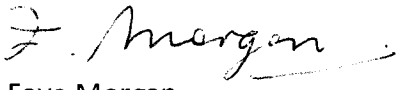
Throughout the negotiation process, members of the Association will be kept informed of the negotiating committee's progress by way of special general meetings and at the final stage of negotiations a special general meeting will be called to present the final package to members for their acceptance.

Please contact us if you require any further information.

Yours sincerely



Robert Morgan



Faye Morgan