Director, Adjudication Branch
Australian Competition and Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2600

23 October 2015.

Reference: A91501 - ihail Pty Ltd application for authorisation

Dear Sir,

In August 2015 I lodged an objection to the proposed ihail taxi booking "app" on the grounds that it would entrench the dominant position enjoyed by MTData. I also stated that, if the app is to be released, it should be on the basis that it can work with other dispatching systems.

On 3rd September 2015 the Applicant submitted that *"ihail has been designed to operate with any existing taxi dispatch system. ihail has developed a generic inter system API that allows 3rd party dispatch systems, such as SmartMove, to dispatch ihail bookings"*. It appears this statement has been accepted at face value in the draft determination (paragraph 48).

Whilst it may be true that *"ihail has been designed to operate with any existing taxi dispatch system"* this does not indicate any willingness on the part of ihail to allow other parties to participate. The API is the formal description of the interface to the ihail system and two requests from CellTrack Systems for information on the API mentioned have been ignored.

As a result I submit that if the ACCC is moved to change its draft determination then it should be done only with an undertaking from ihail that it will actively support the integration of other dispatching systems.

**smartMOVE**
*Make the smart move*

S.W. (Bill) Cumpston
Managing Director, CellTrack Systems Pty Ltd

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