
From: Richard Thorek
Sent: Monday, 1 August 2016 3:16 PM
To: Adjudication
Subject: Bendigo and Adelaide Bank & Ors - Authorisation - A91546 & A91547

Categories: Submission

Good afternoon,

I would like to submit a statement as a current customer of the Commonwealth Bank and therefore a consumer affected by the proposed action. I simply would like to state my objection to a number of the banks statements around this action being driven by consumer choice, best practice and efficiency. I believe they have over simplified the issue and deliberately obfuscated the benefits the third party platforms offer.

Though I welcome the parties rights to negotiate their agreements with third party payment providers, I do not believe the premise of their submission is for the benefit of consumers. The majority of the banks submission makes the case for their negotiation to have the system manufacturers open their payment systems to the banks to use. A primary benefit of third party wallet systems is to streamline payments consumers make whilst increasing security. As a customer I potentially no longer have to carry a set of insecure cards with me, no longer have the risk of someone observing a PIN entry through bio-metric authentication and am using a 'one time' token rather than consistent card data.

There are unsubstantiated statements such as "making on-boarding processes easy for customers also makes it easy for those wishing to commit fraud". Having used the systems on a card offered by another bank I struggle to comprehend the concern. Card issuers are still in full control of the issuance of the card itself, payment systems merely record the details of this card within a device, protected by a pass code or bio-metric second factor authentication that prevents unauthorised use. Single use tokens are used at the time of purchase, further reducing the potential for fraud.

Objecting to the platforms harms the banks customer base in the interim period by preventing access to more secure payment methods. The existing cards can be easily skimmed or copied and used for payments under certain thresholds with no second factor authentication (pin etc).

In conclusion, I welcome competition between the banks in Australia to offer consumers choice, I am making full use of this competition to move to a different provider. I would encourage the ACCC to take consumers ability to make their own decision about payment services into account when considering the application.

regards

Richard Thorek