



**Australian  
Competition &  
Consumer  
Commission**

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26 October 2016

Matt Rubinstein  
Lawyer  
Gilbert + Tobin

*By email: [mrubinstein@gtlaw.com.au](mailto:mrubinstein@gtlaw.com.au)*

Dear Mr Rubinstein

**Aioi Nissay Dowa Insurance Company Australia Pty Ltd & Ors (the Applicants)  
- applications for authorisation A91556 – A91557—interested party  
submissions**

I refer to the above application for authorisation lodged with the Australian Competition and Consumer Commission (the ACCC) on 13 September 2016.

As you are aware, on 23 September 2016 the ACCC wrote to interested parties seeking submissions in relation to the application. The ACCC requested submissions be provided by 14 October 2016, however several interested parties sought and received extensions.

The ACCC has now received public submissions from the following interested parties:

- Australian Automotive Dealer Association
- Choice
- Consumer Action Law Centre
- Financial Rights Legal Centre
- Insurance Council of Australia
- National Insurance Brokers Association
- NM Insurance
- The Board of Underwriting Agencies Council
- Yamaha Group

A copy of each of these submissions is available on the ACCC internet site at [www.accc.gov.au/AuthorisationsRegister](http://www.accc.gov.au/AuthorisationsRegister).

You are invited to respond to any issues raised in submissions, but in particular, the ACCC is interested in any response you may wish to make to the following issues raised:

- Why the proposed 20% cap is considered an appropriate amount
- Why/how would lower commissions result in lower prices to consumers given the lack of price sensitivity of typical consumers of add-on insurance products
- Why a cap on commissions is likely to have an effect on problematic sales practices associated with add-on insurance products
- The scope of the proposal – does the proposal address all relevant sales channels?

We would appreciate your response to submissions by **cob Wednesday 9 November 2016**.

This letter has been placed on the ACCC's public register. If you wish to discuss any aspect of this matter, please do not hesitate to contact Luke Griffin on 02 6243 1114.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'D. Hatfield', is positioned above the typed name.

David Hatfield  
Director  
Adjudication