

10 April 2024

Australian Competition and Consumer Commission
Competition Exemptions
GPO Box 3131
Canberra ACT 2601

Attention: Elizabeth Batten

**Australian Banking Association Ltd (cash-in-transit initiatives)
Application for authorisation AA1000654
Draft determination**

Dear Elizabeth

Background

Customer Owned Banking Association Limited (COBA) is the industry association for Australia's customer-owned banking institutions, which include mutual banks, credit unions and building societies.

We refer to the above application for authorisation and the draft determination dated 20 March 2024 (Draft Determination).

Submission

Under the Draft Determination, the ACCC proposes to grant authorisation to Authorised Parties. Authorised Parties are defined in the Draft Determination to include the ABA, its Member Banks and other classes of persons, including non-Member Banks (which would include COBA members). However, COBA does not consider that the current definition of Authorised Parties would specifically capture COBA given it is not itself a supplier of cash-in-transit services or otherwise distributes or utilises cash.

While COBA does not have an immediate intention to participate in the discussions and exchanges of information that require the protection of the authorisation, it may wish to do so in the future, either with or on behalf of its members.

Accordingly, COBA requests that the authorisation granted under the final determination by the ACCC specifically includes COBA as an Authorised Party.

Please contact the undersigned should you have any questions.

Yours faithfully



MICHAEL LAWRENCE
Chief Executive Officer

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