

23 January 2024

Mr Gavin Jones
Director Competition Exemptions
Australian Competition & Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2601

via **webportal**

Dear Mr Jones

Re: Commonwealth Bank of Australia and Ors application for authorisation AA1000640 – Applicants' response to ACCC's draft determination

Thank you for the opportunity to respond to the Australian Competition & Consumer Commission's (ACCC) draft determination on the Commonwealth Bank of Australia and Ors application, including the modifications to the Aggregator Assurance Program for authorisation AA1000640 (the **Draft Determination**) issued on 18 December 2023. Terms used in this submission have the same meaning as in the Draft Determination unless specified otherwise.

Comments on Draft Determination

Australian Finance Group Ltd (AFG) is pleased with how the modifications to the Aggregator Assurance Program (**Program**) addresses the caveats raised in AFG's previous submissions¹ and as set out in Attachment D Interested Party Submissions of the Draft Determination.

AFG supports the proposed amendments to the **Program** and believes it will encourage best practice by industry participants and ensure a consistent assurance standard across all aggregators is adopted by participating lenders.

AFG would welcome the opportunity to take part in any further consultation on the Program.

Please do not hesitate to contact AFG if you require any further detail about the matters raised in this submission or if AFG can provide any further assistance.

Yours sincerely

Australian Finance Group Ltd

¹ [Australian Finance Group Ltd submission, 22 May 2023](#) and [Australian Finance Group Ltd submission, 20 October 2023](#).