

17 June 2024

Rebecca Ryan  
Assistant Director | Competition Exemptions | Mergers, Exemptions and Digital  
Australian Competition & Consumer Commission  
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CANBERRA ACT 2601

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Dear Ms Ryan,

**Authorisation AA1000671-1: St. Luke's Medical and Hospital Benefits Association (St Lukes)**

On 8 May 2024, St. Luke's Medical and Hospital Benefits Association (St Lukes) applied to the ACCC seeking authorisation to enter into and give effect to certain pricing arrangement provisions in agreements with dental practitioners via the St Lukes Gap Free Network.

St Lukes is a not-for-profit Tasmanian private health insurer that intends to open its own dental practices between 2024 and 2026. The provisions it seeks authorisation for would require participating dental partner providers in the St Lukes Gap Free Network to adhere to maximum chargeable fees for particular services.

Authorisation is sought for a period of 10 years. St Lukes is also requesting interim authorisation to commence entering into agreements with potential dental providers.

Members Health Fund Alliance is fully supportive of St Lukes application for authorisation (AA1000671) for approval to operate a Gap Free network.

We acknowledge the particular design features of the program, specifically the fairness of not operating a dual benefit system. We understand the intent is to ensure consumer choice, accepting that the benefit will remain the same, however there may be a gap for a non-participating provider.

St Lukes, as a not for profit, member owned health insurer, is acting in good faith to ensure its members have access to programs similar to those already approved and in market in Tasmania. This program is in the public interest. We believe it will be beneficial for St Lukes members and will result in higher participation in oral health care, delivering improved health outcomes.

Yours Sincerely



**MATTHEW KOCE**  
CEO, Members Health Fund Alliance

**Putting members' health before profit**

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