



18 January 2024

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

BY EMAIL

Dear Ms Batten

Australian Banking Association Ltd (cash-in-transit services) – Application for authorisation AA1000654 dated 30 November 2023 (the Application)

1. NCR Atleos Australia refers to the:

- (a) Application by Australian Banking Association Ltd (**ABA**) to enable Authorised Parties to engage in discussions and exchange information that is for the purposes of, and reasonably necessary for, developing and evaluating industry responses to support the viability of wholesale cash distribution and access to retail cash services (the **Proposal**); and
- (b) Interim Authorisation granted by the Commission dated 6 December 2023 in relation to the Proposal (**Interim Authorisation**).

Introduction

- 2. Operating in Australia since 1907, NCR Atleos Australia’s business (formerly NCR and Cardtronics) has continuously delivered innovation in consumer payment transaction technologies, including cash, to Australian businesses and consumers for over 100 years.
- 3. NCR Atleos Australia is an owner and operator of the largest number of ATMs in Australia, operating ATMs nationally and providing convenient access to cash to communities in all States and Territories.
- 4. NCR Atleos Australia also supplies ATMs and associated services to Australian financial institutions including ATM hardware, software and maintenance services.

Proposal and Discussions

- 5. NCR Atleos Australia is not opposed to the Proposal or the exploration of appropriate measures to ensure that cash-in-transit (**CIT**) services can be carried out sustainably across all parts of Australia.
- 6. We understand that, because of the Interim Authorisation, discussions are underway between the ABA, Member Banks, and Armaguard on the Proposal (the **Discussions**). NCR Atleos Australia is an ‘Authorised Party’, within the meaning of the Interim Authorisation, and has requested to join the Discussions.
- 7. However, NCR Atleos Australia has been advised that the Discussions are currently focused on wholesale cash distribution and processing arrangements, and the participants are limited to key stakeholders in these aspects of the cash system. Accordingly, NCR Atleos Australia, which operates in the retail cash service distribution chain, has not participated in the Discussions.

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19. We would be open to discussing any aspect of this submission with ACCC should it wish to discuss with us.

Yours sincerely

NCR Atleos Australia