
From: Peter Berlyn <[REDACTED]>
Sent: Friday, April 21, 2023 5:27:52 AM (UTC+00:00) Monrovia, Reykjavik
To: ANZ Suncorp Merger <ANZ-Suncorp-Merger@accc.gov.au>
Subject: Submission.

1. I make this submission late on the authority of your [REDACTED] who has extended the date, for me, until Monday the 24th April 2023 following an oversight by the ACCC.
2. I have had not enough time to read the all of the 103 annexures thoroughly but have skim read all documents.
3. Little or no material directly goes to the points that I will address. There is much about retail consumers but little specifically about small business.
4. I am a Director and Secretary of a company that presently deals with Suncorp.
5. I am also a Director and Secretaries of companies that deal with the ANZ ,Westpac , NAB and the Bendigo.
6. I request that you note, because it is important, that the ANZ, Westpac and the NAB are three of the largest banks in Australia.
7. Note also that Sunway and the Bendigo are smaller in size, by what ever criteria used, than the others. The Bendigo markets its self as the 'largest small bank'.
8. For the record I am a semi- retired Public Accountant of near 45 years standing. I have been involved originally as an employee of the NAB for seven years commencing at age 16 (now [REDACTED]) but subsequent to that in executive roles within small businesses the largest of which had 611 employees and 30 subsidiaries. For near 20 years I had my own business of being a commercial agent for near 180 legal entities all of which individually banked with the ANZ Bank. At the time this number of bank accounts operated electronically made me the operator of the highest number of such ANZ bank accounts in Australia and needed the ANZ Bank to make special electronic banking arrangements just for my business.
9. My professional activities these days largely revolve around 11 operating entities for my family group.
10. I represent to you that I have had decades of experience with electronic banking by small businesses from both an operating perspective and as a professional public accountant with an auditing background.
11. Before continuing, I am completely non- partisan as to whether this proposed merger or takeover occurs other than there is an issue that needs to be given great weight in the consideration and it favours the ANZ Bank.
12. From a small business operator's and as an auditor's perspective the Sunway (and Bendigo) electronic banking system is hopelessly worse than antiquated. It is badly designed to be , practically, dysfunctional for a business greater than 2 or 3 users with excess time to spare . There are several options intended to get around its limitations for larger businesses but which are troublesome, often time impossible, to use by a dynamic Directorship and staff of new and existing employees.
13. Although I am very happy to expand on the above, when we committed to the Sunway Bank we were assured by the bank's representative that the system had all of the controls and functionality that we needed. After we committed to the mortgages over our property security and commenced using the platform we found that we had been unintentionally oversold because, as the representative explained, although he was a long term Suncorp employee he had no personal knowledge as a small business operator and relied on representations from Suncorp computer software designers.
14. We had exactly the same experience with the Bendigo many years earlier, and being bitten by an inferior operating system, was extremely vigilant, we thought, to avoid the same situation with Suncorp. We failed.

15. The result now for us is that only one Director uses the Suncorp electronic system solely for routine transactions. It is not what he should be doing, instead managing and driving the progression of the business.
16. I will now go to the main point of my submission which is every time I have complained to a Suncorp (and Bendigo) representative, the response has been exactly the same which follows.
17. The excuse (or reason) is that the bank doesn't make enough profit to put into software development and maintenance to support a particular segment of the market (small , medium and bigger businesses). The preference is for personal banking. The Bendigo has regurgitated ad nauseum this over and over for more than six years or so. The Suncorp for just over a year and not so vocally as the Bendigo because I knew that my attempts at change would be futile so gave up at an earlier time.
18. Nothing I have to say is to reflect badly on either Suncorp or Bendigo staff as they have all been excellent in other ways.
19. Right at this moment we are closing down our Bendigo relationship because its electronic system leaves us open to fraud and/or embezzlement. We intend to continue with Suncorp until it becomes certain as to what happens between it and the ANZ at the earliest. The Suncorp electronic system is tolerable in the short term but we can see great value in increasing our use of either the ANZ or NAB simply because, on the face of our knowledge, their electronic banking systems are far superior by a long shot.
20. The biggest challenge facing all businesses today, my miles, is, in my opinion, the treats of cyber security and all that that entails. A few weeks ago the ABC program' Four Corners' reported that a threat was made on an Australian business every seven seconds. We have had internal embezzlement by a staff member although I thought I had every cover possible. It is by far the biggest worry of my commercial being and I need for our businesses to have superior operating systems because we cannot afford to go it alone.
21. I will respond to any question that is put to me. Additionally, I will evidence my experience and knowledge upon request.
22. To sum up ,I submit one extremely important issue to be considered by the ACCC is the ongoing capital expenditure capability to develop and enhance the electronic banking platform of the ongoing entity and I did not sense that submissions to date have addressed it thoroughly enough so far.

Thank you

Peter Berlyn
The Berlyn Group


