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President: Tony Wood
P.O. Box 4269
Dandenong South VIC 3164
Phone: 03-8795-5200
Fax: 03-9799-8911
E-mail: tony@daieiaust.com.au

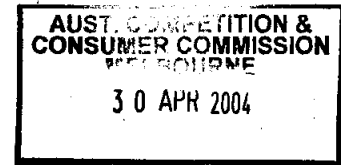


Independent Paper Group

Secretary: Tony O'Shannessy
P.O. Box 639
Inverell NSW 2360
Phone/Fax: 02-6722-3329
E-mail: tosanda@bigpond.net.au

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Mr. David Salisbury
Director, Rail and Waterfront
Transport and Prices Oversight Branch
Regulatory Affairs Division
Australian Competition & Consumer Commission
GPO Box 520J
VICTORIA 3001



Dear Mr. Salisbury,

**Position Paper on Part X Investigation into the
Asia-Australia Discussion Agreement (AADA)**

Thank you for arranging for a copy of the Commission's Position Paper on its Part X investigation on the AADA, and for inviting comments thereon.

We have no additional comments to make, as the Commission's investigation is very thorough and covers the main issues raised in our earlier submission. We therefore support the Commission's preliminary conclusion or view that the Australian Government Minister for Transport and Regional Services has grounds to direct the Registrar of Liner Shipping to cancel the registration of the AADA as far as it relates to permitting the discussion, collective setting and agreement of freight rates (including base freight rates, surcharges, rebates and allowances) and giving effect to such agreement/s.

In supporting the Commission's preliminary view that the collective setting and discussion of freight rates (including surcharges etc.) by members of the AADA should be repealed, we agree that the AADA should not be deregistered in its entirety. In this regard, we understand that the IAA, AADA, and any designated importer bodies in the future, would still be allowed to discuss minimum levels of service for the southbound liner trades from North East Asia (and the west coast of North America as requested in our earlier submission).

Thank you once again for providing the opportunity for putting forward the views of our group.

Yours Sincerely,

A. S. Wood
President
Independent Paper Group

Cc. IPG members