
From: Troy Mossley [REDACTED]
Sent: Tuesday, 30 June 2020 2:28 PM
To: Mahony, Andrew <andrew.mahony@acc.gov.au>
Cc: Craig Sanford [REDACTED]; Channing, Darrell <darrell.channing@acc.gov.au>
Subject: NLNA - Further information on urgency of interim authorisation claim [SEC=OFFICIAL]

Hi Andrew

Thanks again for your email.

In response to your queries, I am instructed as follows:

1. **Tabcorp:** While the NLNA would like and would have appreciated the scope of the proposed conduct set out in their application so that they can liaise, on behalf of their members, with Tabcorp on a range of issues, the NLNA respect the submissions made by Tabcorp and agree to accept all of the suggestions and/or limitations to the proposed conduct as suggested by Tabcorp.
- **Commission-only employees:** The NLNA has advertised on Seek to engage commission-only salespeople purely on the basis of “signing” up members to the NLNA. These people will not and do not sell any products, or other services (and this was the basis on which the NLNA claimed that the assertion from NewsXpress was false). The sole focus of these salespeople is to grow the membership base of the NLNA by introducing newsagents and lottery retailers that are either under represented or not represented by an organisation such as the NLNA. Using commission-only sales people in states that the NLNA does not have offices or other staff is a logical and prudent way for NLNA to expand its reach nationally, whilst being conscious of the costs of expansion, and by not burdening its members with unnecessary fixed costs.

The NLNA has reiterated to me that if the ACCC require any further information on either of the above matters that is necessary for the ACCC to finalise its draft determination and interim authorisation approval (including, in particular, any further information on how the NLNA engages commission only salespeople), please let them know.

Regards,

Troy

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