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McBey, Kim

From: Allison Yeoland <AYeoland@secureparking.com.au>
Sent: Thursday, 9 February 2017 3:25 PM
To: Monforte-Strati, Marie; Brisbane Reception
Cc: Garth Mathews; Brett Mathews
Subject: Re: Secure Parking letter dated 25th January 2017
Attachments: ACCC response 090217.pdf; Appendix A ACCC response 090217.pdf; Appendix B ACCC response 090217.pdf

Dear Guy

Find attached response to the ACCC letter dated 25th January 2017.
Please call or email if you have any questions. My contact details are:

- Direct line: (02) 8912 4918
- Email: ayeoland@secureparking.com.au

Regards,

Allison Yeoland
Chief Financial Officer

Secure Parking Pty Ltd.
Level 13, 100 Miller Street
North Sydney NSW 2060
Telephone: (02) 8912 4918 Facsimile: (02) 9959 3314 Mobile: [REDACTED]
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9 February 2017

Guy Launder
Director
Enforcement Operations QLD & NT
Australian Competition and Consumer Commission
PO Box 12241
George Street Post Shop
BRISBANE QLD 4000

Dear Mr Launder,

Re: Credit card surcharge: Request for information

Secure Parking received a letter from ACCC dated 22 August 2016 and promptly reviewed the level of credit card surcharging in their business. As a result of this review the surcharge was split into a surcharge for payments made at an Automated Pay Station (APS) and manual credit card payments processed through a handheld EFTPOS device (Manual). The 2 payment types were differentiated as the APS machines have extra costs from the 3rd party software which processes the transaction and then pass the transaction through MIGS (MasterCard interchange gateway system) to the bank, CBA. The review resulted in the surcharge being reduced from 3% to 2.5% for APS machines and from 3% to 1.5% for Manual payments.

Please find responses below to the questions in your letter dated 25 January 2017:

Question 1: Pursuant to the definition set out in the Standard (above), is Secure Parking a Large Merchant?

Response: Yes

Question 2: What is the current level of payment surcharge Secure Parking charges customers at its Hotel Jen carpark facility for each credit card type (ie Visa Credit, MasterCard Credit and American Express Companion Cards) when a customer uses a credit card for purchasing goods and makes a payment to you?

Response: 2.5%

Question 3: What is the current level of payment surcharge Secure Parking charges customers at its Hotel Jen car park facility for each debit card type (ie Visa Debit or MasterCard Debit) or EFTPOS when a customer uses such a payment method for purchasing of makes a payment to you?

Response: No EFTPOS facilities as the car park's payments are processed as card not present through APS machine with a surcharge applied of 2.5%.

Question 4: What is the actual cost in percentage terms to Secure Parking to processing a payment for each of those credit/debit cards types respectively?

Response: 2.5%. Refer to appendix A for the calculation

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Question 5: What other payment options (that do not attract a payment surcharge) are available to customers?

Response: At car parks where the surcharge is applied, there is an option to pay cash. If a car park only has an option to accept payment by credit card then no surcharge is applied.

Question 6: Does Secure Parking impose a payment surcharge at its other car parking locations? Please provide a list of all of Secure Parking's car park locations that impose a payment surcharge for the use of credit and debit cards. Provide details (where applicable) of the surcharge rate that is payable at each car park respectively.

Response: 2.5% for payments at the automated pay station and 1.5% for payments through a manual credit card/eftpos terminal. Please find list at Appendix B

Question 7: Has Secure Parking received any complaints from customer relating to credit card surcharges? Provide details of Secure Parking's complaint handling systems and a schedule setting out any customer complaints relating to surcharging and how they were managed by Secure Parking

Response: Secure Parking has received less than 10 general enquires about the credit card surcharge. Secure Parking acknowledges the complaint. Response to the customer is that we have reviewed the ACCC legislation and according to our calculations we are compliant with the legislation.

Question 8: Please advise what actions (if any) does Secure Parking propose to take to address concerns it may have charged a payment surcharge that is excessive in contravention of the CCA?

Response: Based on our investigations, including a [REDACTED] and our calculation attached, there does not seem to be a contravention of the CCA.

Kind Regards

A. Yeoland

Allison Yeoland
Chief Financial Officer
Secure Parking Pty Ltd

APPENDIX A
SECURE PARKING

Surcharge cost calculation: Visa and MasterCard

APS (Automated pay station)

Base data: [redacted] data: Visa and MasterCard transactions as supplied by [redacted]
Transactions: Value [redacted]
Transactions: No [redacted]

Cost of processing of credit card surcharge

1.	[redacted]
2.	[redacted]
2.	[redacted]
3.	[redacted]
4.	No of sites [redacted]
5.	No of sites [redacted]
6.	[redacted]
7.	[redacted]
8. Total costs	[redacted]
9. Total costs/value	2.5%

Manual (Eftpos machines)

Base data: [redacted] data: Visa and MasterCard transactions as supplied by [redacted]
Transactions: Value [redacted]
Transactions: No [redacted]

1.	[redacted]
2.	[redacted]
2.	[redacted]
3.	[redacted]
4.	[redacted]
5.	[redacted]
6.	[redacted]
7.	[redacted]
8. Total costs	[redacted]
9. Total costs/value	1.5%

NOTES

- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- Total of all costs above
- Total costs divided by value of all transactions included in the calculation

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APPENDIX B

Secure Parking

Surcharge car park listing

Car Park Name	State	Car park address	Surcharge
60 Elizabeth Street	NSW	60 Elizabeth Street Sydney NSW 2000	2.5%
Manly Wharf	NSW	Cnr of East Esplanade & Wentworth Street Manly NSW 2095	2.5%
Nepean Hospital	NSW	Cnr of Parker and Derby Street, Kingswood, 2747	2.5%
345 George St, Sydney	NSW	345 George St, Sydney NSW 2000 (Landmark)	2.5%
175 Eagle Street	QLD	175 Eagle Street Brisbane QLD 4000	2.5%
40 Tank St	QLD	40 Tank St, Brisbane, QLD 4000	2.5%
Brisbane Transit Centre	QLD	151 Roma St Brisbane QLD 4000	2.5%
Cathedral Square	QLD	410 Ann St, Brisbane, QLD 4000	2.5%
Central Plaza I	QLD	345 Queen St, Brisbane QLD 4000	2.5%
Office Park	QLD	19 Little Cribb St Milton QLD 4064 (near Coronation Drive)	2.5%
Open Lot	QLD	19 Little Cribb St Milton QLD 4064 (near Coronation Drive)	2.5%
Makerston House	QLD	30 Makerston St, Brisbane QLD 4000	2.5%
Crowe Horwath Centre	QLD	120 Edward St, Brisbane QLD 4000	2.5%
171 Eagle Street	QLD	171 Eagle Street Brisbane QLD 4000	2.5%
Macarthur Central	QLD	229/259 Queen St, Brisbane QLD 4000	2.5%
McWhirters	QLD	Ann St, Fortitude Valley QLD 4006	2.5%
Novotel Brisbane	QLD	200 Creek St, Brisbane QLD 4000	2.5%
Post Office Square	QLD	223-225 Adelaide St, Brisbane QLD 4000	2.5%
Emirates House	QLD	165-175 Eagle St, Brisbane QLD 4000	2.5%
Traders Hotel	QLD	160 Roma St, Brisbane QLD 4000	2.5%
Wintergarden	QLD	Elizabeth St, Brisbane QLD 4000	2.5%
Valley Metro	QLD	230 Brunswick St, Fortitude Valley QLD 4006	2.5%
474 St Kilda Road	VIC	474 St Kilda Road Melbourne VIC 3004	2.5%
522 Flinders Lane	VIC	522 Flinders Lane Melbourne VIC 3000	2.5%
Adina	VIC	189 Queens Street Melbourne VIC 3000	2.5%
80 Collins St	VIC	Nauru House, 80 Collins St, Melbourne, VIC, 3000	1.5%
The Mint	VIC	383 La Trobe Street, Melbourne VIC 3000	2.5%
15 William Street	VIC	15 William Street, Melbourne VIC 3000	2.5%
340 Latrobe Street	VIC	340 Latrobe Street Melbourne VIC 3000	2.5%
59 Lonsdale Street	VIC	59 Lonsdale St Melbourne VIC 3000 (222 Exhibition St)	2.5%
Australian Catholic University	VIC	115 Victoria Parade, Fitzroy, VIC, 3065	2.5%
St Andrews Place	QLD	33 North Street, Spring Hill QLD 4000	2.5%
67 Astor Terrace, Spring Hill	QLD	67 Astor Terrace, Spring Hill QLD 4000	2.5%
55 Little Edward Street, Spring	QLD	55 Little Edward Street, Spring Hill QLD 4000	2.5%
Mincom Central	QLD	192 Ann Street, Brisbane QLD 4000	1.5%
Paradise Centre	QLD	Hanlan Street Surfers Paradise QLD 4217	2.5%
Amora Hotel Jamison Sydney	NSW	11 Jamison Street, Sydney NSW 2000	2.5%
Glasshouse	NSW	135 King Street Sydney NSW 2000	2.5%
Piccadilly	NSW	137 Castlereagh Street, Sydney NSW 2000	2.5%
Royal Prince Alfred Hospital	NSW	Cnr Carillion Ave & Missenden Road Newtown NSW 2042	2.5%
Berry Square	NSW	77 Berry St, North Sydney, NSW, 2060	2.5%
320 Harris Street, Pyrmont	NSW	320 Harris Street, Pyrmont NSW 2009	2.5%
131 Macquarie Street, Sydney	NSW	131 Macquarie Street, Sydney, NSW, 2000	1.5%
Parkhouse	NSW	187 Macquarie Street, Sydney NSW 2000	1.5%
Eastpoint Food Fair	NSW	Cr. Ocean St & New South Head Rd, Edgecliff NSW 2027	2.5%
World Square	NSW	36 Goulburn St, Sydney NSW 2000	2.5%
213 Miller Street, North Sydney	NSW	213 Miller Street, North Sydney NSW 2060	1.5%
No1 Martin Place (Pitt St)	NSW	No1 Martin Place, Sydney, NSW 2000	2.5%
Atrium	NSW	35 Pitt Street, Sydney NSW 2000	1.5%
37 Market Street, Wollongong	NSW	37 Market Street, Wollongong NSW 2500	2.5%
Plaza Hotel Adelaide	SA	14-16 Solomon St, Adelaide SA 5000	2.5%

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State Centre	SA	172-190 Gowler Pl, Adelaide SA 5000	2.5%
The Terrace Adelaide	SA	124-126 Hindley St Adelaide SA 5000	2.5%
21 Bank Street, South Melboi	VIC	21 Bank Street, South Melbourne VIC 3205	2.5%
312 St Kilda Road, Melbourne	VIC	312 St Kilda Road, St Kilda VIC 3182	2.5%
474 Flinders Street, Melbourn	VIC	474 Flinders St Melbourne VIC 3000	2.5%
376 Flinders Street, Melbourn	VIC	376 Flinders Street, Melbourne VIC 3000	2.5%
12 - 20 Flinders Lane	VIC	12 - 20 Flinders Lane Melbourne VIC 3000	2.5%
14-20 Blackwood St, North M	VIC	14-20 Blackwood St, North Melbourne VIC 3013	2.5%
460 Lonsdale Street, Melbourn	VIC	460 Lonsdale Street, Melbourne VIC 3000	2.5%
11 Exhibition Street	VIC	11 Exhibition Street, Melbourne VIC 3000	2.5%
Queens Plaza	QLD	Cnr Edward & Adelaide St, Brisbane, QLD, 4000	1.5%
123 Queen Street	VIC	123 Queen Street, Melbourne VIC 3000	2.5%
10 Eagle St	QLD	10 Eagle St, Brisbane QLD 4000	2.5%
1 Dixon Street	NSW	1 Dixon Street, Sydney NSW 2000	2.5%
Southern Cross	VIC	121 Exhibition St Melbourne VIC 3000	2.5%
Barracks	QLD	61 Petrie Terrace, Brisbane QLD 4000	2.5%
12 Help Street	NSW	12 Help St Chatswood NSW 2067	1.5%
Argyle Street, Newcastle	NSW	11 Argyle St Newcastle NSW 2300	2.5%
Northpoint	NSW	100 Miller Street, North Sydney NSW 2060	2.5%
Parkade (53 Albert Steet)	QLD	53 Albert Steet Brisbane QLD 4000	2.5%
Mercure Hotel	QLD	85 North Quay Brisbane QLD 4000	2.5%
SW1	QLD	32 Cordelia Street, South Brisbane 4101	2.5%
King St Wharf	NSW	1 Shelley St, Sydney NSW 2000	2.5%
10 Valentine Ave, Parramatta	NSW	10 Valentine Ave, Parramatta NSW 2150	2.5%
179 Turbot St, Brisbane (Sunc	QLD	179 Turbot St, Brisbane QLD 4000 (Suncorp)	2.5%
234 Sussex St, Sydney	NSW	234 Sussex St, Sydney NSW 2000	2.5%
Wentworth Sofitel	NSW	61-101 Phillip St Sydney NSW 2000	2.5%
Metcentre	NSW	60 Margaret St, Sydney NSW 2000	2.5%
33 Moore St, Liverpool	NSW	33 Moore St, Liverpool NSW 2170	2.5%
Merritts Place	VIC	558 Little Bouke St, Melbourne VIC 3000	2.5%
Monkey Bar	NSW	51 Orchard Rd Chatswood NSW 2067	2.5%
140 Elizabeth St, Brisbane	QLD	140 Elizabeth St, Brisbane QLD 4000	2.5%
Mandarin Centre	NSW	63-65 Albert Ave Chatswood NSW 2067	2.5%
99 Norton St, Leichhardt	NSW	99 Norton St, Leichhardt NSW 2040	1.5%
Woolworths Bella Vista	NSW	1 Woolworths Way Bella Vista NSW 2153	2.5%
67 Albert St Chatswood	NSW	67 Albert St, Chatswood NSW 2067	2.5%
123 Albert St Brisbane	QLD	123 Albert St Brisbane QLD 4000	1.5%
6 O'Connell St, Sydney (Norw	NSW	6 O'Connell St, Sydney NSW 2000	2.5%
ADC House	NSW	189 Kent St, Sydney NSW 2000	2.5%
Hilton Sydney	NSW	255 Pitt St, Sydney NSW 2000	2.5%
Mater Hospital	NSW	Cnr Rocklands Rd & Gillies St, Crows Nest, NSW 2065	2.5%
26 Danks St Waterloo	NSW	26 Danks St Waterloo NSW 2017	1.5%
Woolworths Neutral Bay	NSW	1-7 Rangers Rd, Neutral Bay NSW 2089	1.5%
Olderfleet	VIC	448 Flinders Lane Melbourne NSW 3000	2.5%
Soul	QLD	4 Esplanade, Surfers Paradise QLD 4217	2.5%
The Strand (250 Elizabeth St)	VIC	250 Elizabeth St Melbourne VIC 3000	1.5%
The Poche Centre	NSW	40 Rocklands Road, North Sydney, NSW 2060	1.5%
121 Marcus Clarke St	ACT	121 Marcus Clarke St Canberra ACT 2601 Fixed Mgt Fee	2.5%
Medica Centre	NSW	31 Dora St, Hurstville NSW 2220	2.5%
Barrack Bridge Car Park	WA	30 Beaufort St, Northbridge WA 6003	2.5%
Hilton Surfers Paradise Hotel	QLD	3113 Surfers Paradise Boulevard, Surfers Paradise QLD 4217	1.5%
Woolstores Shopping Centre	WA	28 Cantonment St Fremantle WA 6160	2.5%
392 Bourke St Melbourne	VIC	392 Bourke St Melbourne VIC 3000	2.5%
Tooronga Shopping Centre	VIC	Cnr Tooronga & Toorak Roads, Glen Iris VIC 3146	2.5%
99 York St Sydney (Bowlers C	NSW	99 York St Sydney NSW 2000	2.5%
4-10 Campbell St	NSW	4-10 Campbell St, Haymarket NSW 2000	2.5%

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570 Bourke St	VIC	570 Bourke St Melbourne VIC 3000	2.5%
12 Creek Street	QLD	12 Creek Street, Brisbane QLD 4000	2.5%
20A Danks St	NSW	20A Danks St Waterloo NSW 2017	2.5%
Aurora Place	NSW	88 Phillip St, Sydney NSW 2000	2.5%
300 Flinders St	VIC	300 Flinders St Melbourne VIC 3000	1.5%
Woolworths Wollongong	NSW	63 Burelli Street Wollongong NSW 2500	2.5%
737 Bourke St	VIC	737 Bourke St Docklands VIC 3000	2.5%
Burwood Plaza	NSW	42 Railway Parade Burwood NSW 2120	1.5%
109 Pitt St	NSW	109 Pitt St, Sydney NSW 2000	1.5%
Campsie Centre	NSW	14-28 Amy St, Campsie NSW 2194	2.5%
Stones Corner Village	QLD	405 Logan Rd Greenslopes QLD 4120	2.5%
24 Gladstone St	VIC	24 Gladstone St Moonee Ponds VIC 3039	2.5%
Midcity	VIC	200 Bourke St Melbourne VIC 3000	1.5%
Goldcoast University Hospital	QLD	Parklands Dr, Southport QLD 4215	2.5%
St James Square	VIC	535 Bourke Street Melbourne VIC 3000	2.5%
McLachlan & Ann Street	QLD	Corner MacLachlan & Ann Street Fortitude Valley QLD 4006	2.5%
Gasworks	QLD	Gasometer 1, Skyring Terrace Newstead QLD 4006	2.5%
Entrada	NSW	20 Victoria Rd Paramatta NSW 2150	2.5%
99 Walker St	NSW	99 Walker St, North Sydney NSW 2060	2.5%
73 Miller Street	NSW	73 Miller St North Sydney NSW 2060	2.5%
111 Pacific Hwy	NSW	111 Pacific Hwy North Sydney NSW 2060	2.5%
Westralia Square	WA	155 St Georges Terrace, Perth WA 6000	2.5%
140 Melbourne Street	QLD	140 Melbourne Street, South Brisbane, QLD 4101	2.5%
The Strand (Coolangatta)	QLD	72-80 Marine Parade Coolangatta QLD 4225	2.5%
Portside Wharf	QLD	39 Hercules Street, Hamilton QLD 4007	2.5%
18 Danks Street	NSW	18 Danks Street Waterloo NSW 2017	2.5%
The Markets - West End	QLD	79 Boundary St West End QLD 4101	1.5%
Shangri-La	NSW	176 Cumberland Street The Rocks NSW 2000	1.5%
10 Browning St	QLD	10 Browning St South Brisbane 4101 QLD	2.5%
Chevron Renaissance Shopping	QLD	3240 Sufers Paradise Boulevard Surfers Paradise 4217 QLD	2.5%
658 Church Street Perm Only	VIC	658 Church Street Richmond VIC 3121	2.5%
Waverley Gardens	VIC	271 Police Road Mulgrave VIC 3170	2.5%
Dee Why Grand	NSW	15 Pacific Parade Dee Why NSW 2099	2.5%
2 Elizabeth Plaza	NSW	115 Pacific Hwy, North Sydney NSW 2060	2.5%
Wollongong Private Hospital	NSW	362 Crown Street Wollongong NSW 2500	2.5%
Rundle Place	SA	90 Grenfell Street Adelaide SA 5000.	2.5%
699 Bourke Street	VIC	699 Bourke St Melbourne VIC 3000	2.5%
388 Brunswick Street (Tempc	QLD	388 Brunswick St, Fortitude Valley QLD 4006	2.5%
200 Mary St	QLD	200 Mary St, Brisbane QLD 4000	2.5%
Fortescue Centre	WA	23 Plain St, East Perth 6004 WA	2.5%
Gold Coast Private Hospital	QLD	Cnr Parklands Dr and Innovation Dr Southport QLD 4215	2.5%
Allianz Centre	NSW	2 Market St, Sydney NSW 2000	2.5%
20 Bond Street	NSW	10-20 Bond St, Sydney NSW 2000	2.5%
QV1	WA	488 Murray St Perth WA 6000	2.5%
475 Victoria Avenue	NSW	475 Victoria Avenue, Chatswood NSW 2067	2.5%
700 Collins Street	VIC	700 Collins St Docklands VIC 3000	2.5%
Prince Alfred Hospital	NSW	New Hospital Rd off Carillon Ave, Camperdown NSW 2050	1.5%
Chinatown Fortitude Valley	QLD	31 Duncan St, Fortitude Valley QLD 4006	2.5%
Melbourne Museum	VIC	11 Nicholson Street Carlton VIC 3053	1.5%
Village Cinemas Hobart	TAS	181 Collins St Hobart TAS 7000	2.5%
480 Queen Street	QLD	480 Queen St, Brisbane QLD 4000	2.5%
Oceanside	QLD	3 Bright Place Birtinya QLD 4575	2.5%
75 Dorcas Street	VIC	75 Dorcas St, South Melbourne VIC 3205	2.5%
Newtown Central	NSW	330 King Street Newtown NSW 2042	2.5%
Dendy Newtown	NSW	261-263 King Street Newtown NSW 2042	1.5%
Rydges Melbourne Hotel - 18	VIC	186 Exhibition St Melbourne VIC 3000	2.5%

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367 Collins St	VIC	367 Collins Street Melbourne VIC 3000	1.5%
Como Centre	VIC	Cnr of Chapel and Toorak Rd South Yarra VIC 3141	2.5%
Dendy Plaza	VIC	28 Church St, Brighton VIC 3188	2.5%
St Johns College	NSW	10 Missenden Road, Camperdown NSW 2050	1.5%
Darling & Co	QLD	157 Given Tce, Paddington QLD 4064	2.5%