

Commonwealth Bank

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General Manager
Fuel, Transport and Prices Oversight Branch
Australian Competition and Consumer Commission
GPO Box 520
Melbourne
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Dear Madam/Sir

Response to ACCC draft Guide to inquiries into disputes about bulk interconnection services

Please find below our comments to the specific questions raised in the draft guide:

Q 3.1 Do you have any comments on the proposed use of a pre-notification process in a bulk interconnection service dispute?

The CBA Group support a pre-notification process as this provides the opportunity to gather the necessary information prior to lodging a dispute.

Q 3.2 Do you have any other comments on how the ACCC would commence a bulk interconnection service inquiry that are discussed in this chapter?

The CBA Group suggest that in addition to a user or proposed user being able to lodge a dispute, an industry association should also be allowed to lodge a dispute, either in its own right or on behalf of its members.

It is suggested that the terms “sufficient interest” and “reasonable time” are defined. If the rate is under dispute because Australia Post has not provided sufficient justification to support the increase or if there has been insufficient notice provided then the existing rate should apply.

Q 4.1 Do you have any comments on the proposed use of a case management meeting to assist the dispute resolution process?

The CBA Group support the use of case management meetings to assist the dispute resolution process.

Q 4.4 Do you have any comments on the process for involvement of interested parties in a bulk interconnection service dispute, including when and how this involvement could take place?

The CBA Group suggests that the guide explains how the ACCC determine who may want to become a party to the dispute.

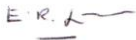
It is not practical to notify the public of disputes via the ACCC website as this requires interested parties to monitor if disputes have been raised. It is suggested that an email communication is distributed to a database of parties who may become interested participants.

Chapter 5 Comments

Consultation from the Minister should be both with Australia Post and with the person lodging the complaint and both parties should have the option to provide a further response.

Thank you for the opportunity to comment on the draft guidelines on how disputes about bulk interconnection services will be handled.

Yours faithfully

A handwritten signature in black ink, appearing to read 'E. R. Louw', with a horizontal line underneath.

Eleanor Louw

Category Manager – Business Services