

Anthony Hilton  
Director, Competition Exemptions

9 January 2024

Australian Competition & Consumer Commission (ACCC)  
GPO Box 3131  
Canberra ACT 2601

*Lodged via portal.*

## Australian Banking Association application for ACCC authorisation for a minor variation to authorisation AA1000441

Dear Anthony,


Australian Payments Plus (**AP+**) supports the application by the Australian Banking Association (**ABA**) who seek Australian Competition & Consumer Commission (**ACCC**) authorisation under the *Competition and Consumer Act 2010* (Cth) for a minor variation to the existing ACCC authorisation (AA1000441) to amend clause 44B(e) of the Banking Code to provide for developments in relation to payments methods and technologies.

AP+ brings together Australia's three domestic payment rails, BPAY, eftpos and the New Payments Platform (**NPP**), into one integrated entity. AP+ builds and operates Australia's national payment and data infrastructure.

AP+ as owner and operator of the Australian Debit Card Scheme *eftpos*, considers that the proposed amendment better reflects the multiple ways a consumer can choose to make a debit payment beyond the traditional debit card, these methods include PayTo, tokens and QR codes.

AP+ considers the variation sought is minor and will not reduce the extent of the net public benefit resulting from the conduct detailed in the authorisation. AP+ would support the ACCC granting this variation as requested. We are available to answer any further questions.

Yours sincerely,



Aidan O'Shaughnessy.  
Public Policy, Government & Regulatory Affairs, AP+

*Australian Payments Plus (AP+) brings together Australia's three iconic domestic payment providers, BPAY Group, eftpos and the NPP (New Payments Platform) into one integrated entity. Operating in the public interest, AP+ is a member-owned organisation. Members include banks, some of the country's largest retail merchants, payment service providers and payment processors.*

*The AP+ integrated product roadmap includes products and rails that support opening the domestic payment flow, connecting next generation experiences to traditional payments infrastructure, driving innovation through QR (Quick Response) payments, building open wallet infrastructure and our national trusted identity exchange - ConnectID.*