

12 April 2024

Australian Competition and Consumer Commission
Competition Exemptions
GPO Box 3131
Canberra ACT 2601

Attention: Elizabeth Batten

**Australian Banking Association Ltd (cash-in-transit initiatives)
Application for authorisation AA1000654**

Dear Elizabeth

Background

Customer Owned Banking Association Limited (**COBA**) is the industry association for Australia's customer-owned banking institutions, which include mutual banks, credit unions and building societies.

We refer to the above application for authorisation (**Second Application**) and the interim authorisation dated 28 March 2024 (**Interim Authorisation**). We also refer to the ABA's application for authorisation AA1000654 (**First Application**) and COBA's submission dated 10 April 2024 relating to the First Application (**Previous COBA Submission**).

Submission

Under the Interim Authorisation, the ACCC has granted interim authorisation to Authorised Parties for the Authorised Conduct. Authorised Parties are defined in the Interim Authorisation to include the ABA, its Member Banks and other classes of persons, including non-Member Banks (which would include COBA members). However, COBA does not consider that the current definition of Authorised Parties would specifically capture COBA given it is not itself a supplier of cash-in-transit services or otherwise distributes or utilises cash.

While COBA does not have an immediate intention to participate in the Authorised Conduct or the Proposed Conduct under the Second Application that requires the protection of the Interim Authorisation or any final authorisation that is granted, it may wish to do so in the future, either with or on behalf of its members.

Accordingly, as with the Previous COBA Submission, COBA requests that:

- the Interim Authorisation be amended to specifically include COBA as an Authorised Party; and
- any final authorised that is granted, specifically includes COBA as an Authorised Party.

Please contact the undersigned should you have any questions.

Yours faithfully



MICHAEL LAWRENCE
Chief Executive Officer

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