

7 April 2025

Mr Anthony Hilton
Director
Competition Exemptions Branch
Mergers, Exemptions & Digital Division
Australian Competition & Consumer Commission

Via webform

Dear Mr Hilton

Australian Payments Network Limited's application for authorisation AA1000690 – interested party consultation

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.

Under the application for authorisation, the Proposed Authorised Parties include BECS members, NPP members and other businesses that are relevantly concerned in the supply, acquisition or use of account to account payment services in Australia. Although the Proposed Authorised Parties include members of COBA, COBA does not consider that the definition includes COBA itself given COBA does not actively participate in the account to account payment system.

While COBA does not have an immediate intention to participate in the discussions and exchanges of information that require the protection of the authorisation, it may wish to do so in the future, either with or on behalf of its members.

Accordingly, COBA requests that the authorisation granted under the final determination by the ACCC specifically includes COBA as an Authorised Party. We consider this to be a prudent change given the complexity of this transition.

Thank you for taking the time to consider our submission. If you wish to discuss this submission, please contact Alexander Woloszyn, Policy Manager (awoloszyn@coba.asn.au).

Yours sincerely



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Chief Executive Officer

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