

18 May 2026

Mr Anthony Hilton
Director, Competition Exemptions
Mergers, Exemptions and Digital
Australian Competition and Consumer Commission

Via portal: acc.gov.au

Dear Mr Hilton

AA1000722-1 – Australian Banking Association Ltd – Regional ATM Trial

COBA appreciates the opportunity to be consulted on the Australian Banking Association's (ABA) application to conduct a Regional ATM Trial (the Trial).

Subject to the comments below, COBA does not oppose the granting of an authorisation to the ABA to conduct the Trial.

COBA supports the Trial being open to all interested banks, but notes COBA members do not currently have access to sufficient information to determine whether to participate. This information comprises:

- *ATM locations:* While the application has disclosed the regions that are intended to have ATMs, members need to know the exact locations if they are to decide whether to participate. COBA understands that these are subject to commercial discussions and will be disclosed in due course.
- *Cost model:* The cost model is a key consideration for COBA members determining whether to participate. At present, COBA does not have sufficient information to determine whether the cost model is appropriate or proportional for small and medium banks. Further, we would be keen to understand how costs will be calculated for banks with a limited geographic presence.

COBA welcomes the exploration of innovative and alternative ways of providing cash services to remote and regional Australia. However, we are also mindful that collective endeavours, such as the Trial, need to be managed in a way that does not inadvertently reduce the viability of regional banking services more broadly.

We thank the ACCC for taking our views into account. Please do not hesitate to contact Robert Thomas, Senior Manager Policy (rthomas@coba.asn.au) if you have any questions about our submission.

Yours sincerely



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Chief Executive Officer

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