



06 May 2020

Mr Gavin Jones
Executive Director, Adjudication
Australian Competition & Consumer Commission
Level 2, 23 Marcus Clarke Street
Canberra 2601
email: adjudication@acc.gov.au

Dear Mr Whitby

AusPayNet application for revocation of authorisation A91497 and A91498 and substitution of AA1000495

The Australian Banking Association (ABA) appreciates the opportunity to make a submission to the ACCC's consultation on the application from AusPayNet for re-authorisation under the *Competition and Consumer Act 2010* (Cth). The ABA supports the AusPayNet application for re-authorisation.

The ABA considers the Issuers and Acquirers Community (IAC) framework provides opportunities for coordination, self-regulation and policy setting which delivers important public benefits.

The ABA worked with AusPayNet to develop the Guidelines for Accessibility for Touchscreen Terminals. Those guidelines are a world-first to address access to point of sale (POS) touchscreen technology for people living with disability and helps to ensure innovations in payments technology are accessible to the widest population.

The ABA also notes other initiatives undertaken by the IAC which provides both benefits to consumers and also supports innovation across the wider payments industry:

- the Card-Not-Present Fraud Migration Framework, implemented on 1 July 2019, was designed to reduce levels of online card fraud, and build consumer trust in e-commerce.
- the Open Loop Transport Payments Framework allows commuters to pay for transit just as they would for any other purchase made with their contactless card or mobile device.
- the introduction of a temporary increase in contactless PIN limits from \$100 to \$200 as a preventative measure against the spread of COVID-19.
- working with members and ID Care to provide the member staff with practical guidance on the steps they can take when engaging with individuals who have experienced the theft of their personal, account or credential information via scams, identity theft or cybercrimes.

If you have any questions, please contact me at rhonda.luo@ausbanking.org.au.

Yours sincerely

Signed by

Rhonda Luo
Director, Policy

About the ABA

The Australian Banking Association advocates for a strong, competitive, and innovative banking industry that delivers excellent and equitable outcomes for customers.

We promote and encourage policies that improve banking services for all Australians, through advocacy, research, policy expertise and thought leadership.