

3 June 2011

Office of the Australian Information Commissioner

GPO Box 5218
Sydney, NSW 2001

Submitted by email to
consultation@oaic.gov.au



Dear Sir/Madam,

Subject: Review of Credit Provider Determinations, Consultation Paper 1 "Assignees and Classes of credit providers"

Thank you for providing Industry with the opportunity to comment on the Consultation Paper No. 1, Review of Credit Provider Determinations, "Assignees and Classes of credit providers".

As the Credit Provider Determination No. 2006-03 (Assignees) is of limited interest to our members, Communications Alliance and the Australian Mobile Telecommunications Association (the Associations) would like to offer their comments only in relation to the Credit Provider Determination No. 2006-04 (Classes of Credit Providers).

The Associations concur with the Consultation Paper's view that the appropriate forum for debate of the merit of the substance of the Credit Provider Determinations is the Senate Inquiry that is currently conducted. To ensure appropriate scrutiny and discussion throughout future review processes consideration ought to be given to embodying the content of the Credit Provider Determinations in legislation rather than making use of determinations.

At this point in time, the Associations do not see any evidence demonstrating reasons not to renew the Classes of Credit Providers Determination. They are also not aware of any reasons to amend the Classes of Credit Provider Determination.

Communications Alliance and the Australian Mobile Telecommunications Association support the renewal of the Credit Provider Determination No. 2006-4 (Classes of Credit Providers) without substantive amendment for a period of 3 years.

Yours sincerely,

John Stanton
Chief Executive Officer
Communications Alliance

Chris Althaus
Chief Executive Officer
Australian Mobile
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