

1 August 2005

Dr John Veale  
Head of Payments Policy  
Reserve Bank of Australia  
GPO Box 3947  
Sydney NSW 2001

Dear Dr Veale

**Submission on proposed Access Regime for Visa Debit**

MoneySwitch Limited is a Specialist Credit Card Institution focusing on credit and debit card acquiring.

Working towards entering the merchant card acquiring market in late 2005, MoneySwitch has applied for principal membership of Visa International. The current credit card access regime allows MoneySwitch to acquire Visa credit cards, but not to acquire Visa Debit cards.

As Visa Debit cards are currently indistinguishable from Visa credit cards, it is not possible to provide acquiring services for Visa credit cards only. In order to have a viable offering, an organisation offering acquiring services to merchants must be able to acquire the full range of cards in common use in Australia. This includes Visa credit, Visa Debit, MasterCard, Bankcard and PIN based EFTPOS debit cards. The existing providers of merchant services offer acquiring for all of these card types.

As MoneySwitch cannot process Visa Debit cards, it will not be able to provide an effective solution, resulting competition in the merchant card acquiring market being diminished. MoneySwitch is at a significant competitive disadvantage as a result of being unable to acquire Visa Debit cards.

MoneySwitch views the proposed access regime for Visa Debit essentially as a "technical" correction to the access regime for Visa membership for card acquiring.

MoneySwitch fully supports the proposed access regime for Visa Debit.

Sincerely,

A handwritten signature in black ink that reads 'Paul A Wood'.

Paul A Wood  
Chief Technical Officer