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16 January 2014

Head of Payments Policy Department
Reserve Bank of Australia
GPO Box 3947
Sydney NSW 2001
pysubmissions@rba.gov.au

Dear Sir/Madam:

Proposed Variation to the MasterCard and Visa Access Regimes

eNett International (Singapore) Pte. Ltd (eNett) refers to its previous submission dated 8 July 2013 to the Consultation Documentation published by the Reserve Bank of Australia in May 2013 with regard to its review of the card system access regimes (Previous Submission), and to the RBA's Consultation Document dated 6 December 2014, regarding the Proposed Variation to the MasterCard and Visa Access Regimes (Consultation Document).

Consistent with its Previous Submission, eNett supports the RBA's preliminary view that the RBA's proposed option of varying the Access Regimes and removing Banking Regulation 4 to allow the schemes themselves to determine eligibility would best promote the public interest and balance the interests of current and prospective future participants in the MasterCard and Visa credit card systems and the Visa Debit system.

eNett reiterates its view that the current position has the effect that prospective participants in the card schemes, whether as acquirers or issuers, are necessarily discouraged from entry because of the requirements which attach to becoming, and being supervised as, an ADI. Those requirements are, in eNett's view more onerous than is justified by the relevant activities, in particular if prospective participants are already subject to a level of prudential supervision overseas.

In eNett's submission, consistent with the RBA's preliminary view, reliance on the requirements imposed by the schemes, which are specifically tailored to the needs and risks of participation in a scheme and the activities undertaken as a scheme member, should be the sole requirement for scheme participation. Those requirements appropriately balance a desire by the scheme and its members for the broadest possible level of scheme participation, while excluding those who are not equipped, experienced or adequately funded or collateralised to participate or who pose an unacceptable level or risk to the scheme. Moreover, as the card scheme effectively assumes responsibility for transactions arising through its scheme, risk to the financial system is limited.

eNett has no specific comments on the form of the draft Access Regimes proposed under Option 2.

We appreciate this further opportunity to provide our views with regard to these matters.

Yours faithfully,

Anthony Hynes
Managing Director & CEO
eNett International (Singapore) Pte. Ltd.