Interest would be 260% of the initial $5,000 indebtedness.

**10.      References to the Writer's earlier approaches on CDs concerning Australia's *Central Bank's* failure to observe its** [**Parliamentary Bestowed Mandate**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CParliamentary_Bestowed_Mandate.htm)**to *"***[**best contribute to.......... the economic prosperity and welfare of (ALL) the people of Australia**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CParliamentary_Bestowed_Mandate.htm)**" that includes Credit Cardholders, through no fault of their own, possess low** [**Financial Literacy Capacity**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CNumeracyAndLiteracyTargeting.htm)

1. [**Writer's**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CWriter%5CWriter.htm) **letter to** [**Ms. Sharon van Etten, Public Relations Officer, Media & Public Relations Office, Reserve Bank of Australia dated 8 Dec 2011**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CRBA%5CComms%5CResponse_to_RBA_8_Dec_11b.htm)seeking application of the[**User Pays Principle**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CUser_Pays_Principle.htm)to Credit Cards.
2. [**Writer's**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CWriter%5CWriter.htm)[**Submission to Maurice Blackburn dated 25 June 2017**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CMauriceBlackburn%5CSecondLetterToMauriceBlackburn_25-Jun-17.htm)and[**Maurice Blackburn's response letter dated 14 July 2017**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CMauriceBlackburn%5CMaurice_Blackburn_response_letter_14_July_17.pdf)**.**
3. [**Writer's letter to the Executive Producers of Four Corners dated 15 Sept 2017 re proposed *Four Corners* program titled "*Nobody Cares in a Christian Country*" that would chronicle/detail the ineptitude of two of Australia's Three Financial Services Regulators to the detriment of almost half a million *Persistent Revolvers***](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CABC%5CLetterToExecutiveProducersFourCorners_15-Sept-17.htm)
4. [**Writer's Submission to the Head of the Royal Commission into misconduct in the Banking, Superannuation and the Financial Services Industry dated 18-Apr-2018**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CRoyalCom%5CSubmissionToRoyalCommission_18-Apr-18.htm)that provided [**Thirty Two Written Questions and Supporting Evidence**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CRoyalCom%5CQuestions%5CQuestions_Table.htm)relating to Credit Cards for the Royal Commission to consider asking the RBA, ACCC, APRA and ASIC.
5. [**Writer's**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CWriter%5CWriter.htm)[**Submission to Adele Ferguson dated 5 Oct 2019**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CComms%5CLetter_to_Adele_Ferguson_5-Oct-19.htm)that provided evidence for a Second Wave of the Royal Commission into Financial Services
6. [**Writer's**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CWriter%5CWriter.htm)[**Submission to Ian Verrender dated 5 Feb 2020**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CComms%5CLetter_to_Ian_Verrender_5-Feb-20.htm)that provided evidence for a Second Wave of the Royal Commission into Financial Services.
7. [**Writer's Submission to Michael West Media dated 10 July 2020**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CComms%5CLetter_to_Michael_West_10-July-20.htm) that alleged that the RBA had breached its [**Statutory Duty**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CStatutory_Duty.htm) and [**Fiduciary Duty**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CFiduciary_Duty.htm) to[**Credit Cardholders**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCredit_Cardholders.htm)with poor [**Financial Literacy Capacity**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CFinancial_Literacy.htm)
8. [**Writers letter to Paul Keating dated 28 Oct 2020**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CComms%5CLetter_to_Paul_Keating_28-Oct-20.htm) that requested hesend his CD to two different 'constitutional lawyers' to opine on his -

A.     allegations against the RBA summarised in [**Evidence Facts Sheet**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CComms%5CFacts_Sheet_for_Paul_Keating.htm);

B.     [**Thirty-Two Questions Directed at Three Financial Services Regulators, or a Royal Commissioner, and Supporting Evidence**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CRoyalCom%5CQuestions%5CQuestions_Table.htm)that warrant each question being asked in a Second Wave of the Royal Commission into Financial Services; and

C.     [**Evidence Facts Sheet**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CComms%5CFacts_Sheet_for_Paul_Keating.htm).

1. [**Writer's letter to Professor Elizabeth Sheedy dated 15 Feb 2021**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CComms%5CLetter_to_Elizabeth_Sheedy_15-Feb-21.htm)that asked whether an ex-Prime Minister that is adept *at taking it*, should also *walk it* by rebuking the RBA for not re-imposing a maximum interest rate *Cap* on all[**Credit Cards**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCredit_Cards.htm)to halt the pillaging of[**Financially Uneducated And Vulnerable Credit Cardholders.**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CFinancially_Uneducated_And_Vulnerable.htm)

The[**Writer's**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CWriter%5CWriter.htm) letter on CDs to 5, 6 and 7 above -

a)        recommended a very brief *second wave* of the Royal Commission; and

b)        provided[**Thirty-Two Written Questions directed at Financial Services Regulators, and a Royal Commissioner, and my Supporting Evidence**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CRoyalCom%5CQuestions%5CQuestions_Table.htm)that warrant these questions.

to right the wrongs within the most differentiated product in the entire Western World, because -

\*           12.58% *circa* of all Credit Cardholders, identified by the RBA as [***Persistent Revolvers***](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CActions%5CPersistent_Revolvers.htm), invariable with low [**Financial Literacy Capacity**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CFinancial_Literacy.htm), have paid 80% *circa* of all[**Interest and Penalty Fees Revenue**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CInterest_And_Penalty_Fees_Revenue.htm); and

\*           five former Prime Ministers have attested that Australia is an[**egalitarian country**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CEgaliterian_Country.htm), yet it is not.

Extensive[**Supporting Documented Evidence**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CRoyalCom%5CQuestions%5CQuestions_Table.htm) to warrant each of the[**Thirty-Two Written Questions**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CRoyalCom%5CQuestions%5CQuestions_Table.htm)is accessible by clicking on each Question number.

So complex, that if the 2018 Royal Commission into Financial Services had *kicked-off* by investigating [**Unconscionable Conduct**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CUnconscionable_Conduct.htm) by many[**Credit Card Issuers**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCredit_Card_Issuer.htm)that manifested over the last 20 years, Commissioner Hayne could have expended all of 2018 *cleaning up* only one banking product, albeit the most prolifically used, such is the breadth and depth of[**Unconscionable Conduct**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CUnconscionable_Conduct.htm)ostensibly targeted at[**Financially Uneducated And Vulnerable Australian**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CFinancially_Uneducated_And_Vulnerable.htm)[**Credit Cardholders**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCredit_Cardholders.htm)with[**Low Financial Literacy Capacity**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CNumeracyAndLiteracyTargeting.htm)**.**

**11.       Postscript**

The RBA needs to be held to accountfor the[**Extreme Financial And Emotional Distress**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CExtreme_Financial_And_Emotional_Distress.htm)that the [**Financially Uneducated And Vulnerable**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CFinancially_Uneducated_And_Vulnerable.htm)[***Persistent Revolvers***](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CClass_Actions%5CPersistent_Revolvers.htm), the majority of whom would be *rusted on* Labor voters, have suffered during the last 25+ years.  The vast majority received their first Credit Card in their late teens or very early adulthood, with rarely*a skerrick of* money management understanding, but rather were confronted by [**Predatory Advertising**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CPredatorySaleOfAFinancialProduct.htm)**.**

[**Is Australia really an egalitarian country?**  **Five Prime Ministers have *talked it* by professing so.  But our Federal Govt hasn't *walked it*, obligated under Section 51 of the Australian Constitution, to the detriment of Financially Uneducated And Vulnerable Australians that possess, often through no fault of their own, poor Financial Literacy Skills; some Credit Card Issuers have deployed Predatory Advertising and charged Usurious Interest Rates and Penalty Fees, Targeted at Credit Cardholders with Low Financial Literacy Capacity**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CEgaliterian_Country.htm)**.**

[**Prior to the Campbell Report *circa* early 1980's, the RBA regulated all Australian bank interest rates with an *Iron Fist***](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CPrior_to_the_Campbell_Report%2C_RBA_rulled_with_Iron_Fist.htm) dating back to the failure of banks in the 19th century[-**"... when de-regulation resulted in adverse consequences, re-regulation ensued..."**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CPrior_to_the_Campbell_Report%2C_RBA_rulled_with_Iron_Fist.htm)**.**

Many[**Credit Card Issuers**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCredit_Card_Issuer.htm)have engaged in[**Predatory Advertising**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CPredatorySaleOfAFinancialProduct.htm)charging[**Usurious Unsecured Personal Loan Interest Rates**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CUsury_Unsecured_Interest_Rates.htm) overtly [**Targeting Credit Cardholders with Low Financial Literacy Capacity**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CNumeracyAndLiteracyTargeting.htm)[**Financially -  Uneducated And Vulnerable Australians**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CFinancially_Uneducated_And_Vulnerable.htm)suffering[**Extreme Financial And Emotional Distress**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CExtreme_Financial_And_Emotional_Distress.htm)for over 25 years, whilst 67% of Credit Cardholders, identified by the RBA as[***Transactors,***](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CClass_Actions%5CTransactors_and_Revolvers.htm) have enjoyed their [**Lines of Credit**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CLine_Of_Credit.htm) from regularly using their[**Credit Cards**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCredit_Cards.htm)at virtually no cost, even though the RBA has previously written that the [***User Pays Principle***](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CUser_Pays_Principle.htm)should apply to[**Credit Card Products**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCredit_Card_Products.htm)**.**

[**Inaction by APRA and ASIC was attributed to some scandals exposed in the Royal Commission into Misconduct in the Banking, Superannuation and Financial Services Industry**](https://www.moneymanagement.com.au/news/policy-regulation/asic-and-apra-accountability-royal-commissioner)**.** ABCNews Business Editor,[**Ian Verrender**](https://www.abc.net.au/news/ian-verrender/5261264), article (26 Nov 2018)[**Is it time for corporate watchdog ASIC to be put down?**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CABC%5CIs_it_time_for_corporate_watchdog_ASIC_to_be_put_down.htm)includes "It is this cosy relationship that forms the nub of the problem".

Yet far more consequentially,[**Australia's Principal Regulator of the Payments System**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CParliamentary_Bestowed_Mandate.htm)has been complicit with[**Credit Card Issuers**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCredit_Card_Issuer.htm)that engaged in[**Predatory Advertising**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CPredatorySaleOfAFinancialProduct.htm)even though the Commonwealth Govt had enacted legislation for the [**Principal Regulator of the Payments System**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CParliamentary_Bestowed_Mandate.htm)to act upon[**Unconscionable Conduct**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CUnconscionable_Conduct.htm)from [**Predatory Marketing**,](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CPredatorySaleOfAFinancialProduct.htm) in particular concealed interest penalties [in **9 font Arial dark grey in 98 pages *T&Cs***](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CUncon_Cond%5CBalTransfers%5CANZ%5CANZ-CreditCards-Conditions-Of-Use.pdf), of some [**Credit Cards.**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCredit_Cards.htm)

*Post* the 2018 Royal Commission**, "**[**ASIC and APRA, in addition to the Royal Commission recommendations addressed to them specifically, are now working with the Federal Government to assist the development of legislative reform**](https://www.claytonutz.com/knowledge/2020/march/asic-and-apra-provide-update-on-post-financial-services-royal-commission-regulation)**":**

* **"**[**ASIC Management Accountability Regime**](https://download.asic.gov.au/media/5419737/amar-accountabiity-map-published-19-12-2019.pdf)and[**Governance and Senior Executive Accountabilities**](https://www.apra.gov.au/sites/default/files/Governance%20and%20Senior%20Executive%20Accountabilities.pdf)**:**The FSRC recommended that the purpose of the Banking Executive Accountability Regime (**BEAR**) also be applied to both ASIC and APRA – both regulators released their accountability framework in December 2019."
* "APRA is providing assistance with legislative reforms that give effect to the Financial Accountability Regime (that will extend the BEAR regime). ASIC is also focused on implementation arrangements for new laws as they commence."

**12.     Summary - The central issue:**
In April 1985 the 18% interest rate *Cap* on Credit Cards was removed when the overnight cost of funds was 17.2% *circa* - spread was less than 1%.

Less than two years ago the spread between the [**Overnight Cash Rate**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCash_Rate.htm)of 0.10% and the highest[**Cash Advance**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCash_Advance.htm)interest rate[**(Latitude Financial's Go Mastercard) was over 28%**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CImages%5CGo_Money_Mastercard_Latitude_Financial.jpg).

[***Persistent Revolvers***](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CActions%5CPersistent_Revolvers.htm)invariably with low [**Financial Literacy**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CFinancial_Literacy.htm)that account for a mere[**12.58%**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CActions%5CCreditCardStatistics_4-May-17.xls) *circa* of [**Credit Cardholders**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCredit_Cardholders.htm)havecontributed a *whopping* 80% *circa* of that [**$6.3 billion**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CABC%5Caustralian_banks_save_billions_by_failing_to_pass-on_%20rate_cuts.htm) ([**asserted by Alan Kirkland of CHOICE in June 2022**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CChoice%5C%246.3%20billion_stolen_from_pockets_of_Australians_by_banks_CHOICE.htm)) in [**Interest And Penalty Fees Revenue**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CInterest_And_Penalty_Fees_Revenue.htm)due ostensibly to [**Credit Card Issuers**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCredit_Card_Issuer.htm)not passing on falls in the [**Overnight Cash Rate**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCash_Rate.htm)**.** The remaining 20% of that[**$6.3 billion**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CABC%5Caustralian_banks_save_billions_by_failing_to_pass-on_%20rate_cuts.htm) was paid by other [***Occasional Revolvers***](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CActions%5COccasional_Revolvers.htm)thataccount for 20.42% *circa* of all [**Credit Cardholders**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCredit_Cardholders.htm).  The remaining 67% *circa* of all [**Credit Cardholders**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCredit_Cardholders.htm), described by the RBA as[***Transactors***](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CActions%5CTransactors_and_Revolvers.htm)***,*** contributed *zilch* of that [**$6.3 billion**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CABC%5Caustralian_banks_save_billions_by_failing_to_pass-on_%20rate_cuts.htm) of [**Interest And Penalty Fees Revenue**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CInterest_And_Penalty_Fees_Revenue.htm).  Hardly, an example of the [***User Pays Principle***](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CUser_Pays_Principle.htm)that "[**RBA's Reform of Credit Card Schemes in Aust: "I A Consultation Document" – Dec 2001**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CTwoExceedinglyCostlyMonthlyInterestChargingPractices.htm)advocated it apply to [**Credit Card Products**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCredit_Card_Products.htm)[**"....consistent with the approach adopted by Australian financial institutions in pricing other payment instruments under their control**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CTwoExceedinglyCostlyMonthlyInterestChargingPractices.htm)**."**  [**But its Board never adopted its own policy document**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CTwoExceedinglyCostlyMonthlyInterestChargingPractices.htm).

**13.     Footnotes**

[**"RBA Governor Philip Lowe says it’s ‘still plausible’ first rate rise won’t be before 2024"**](https://www.news.com.au/finance/economy/australian-economy/rba-governor-philip-lowe-says-its-still-plausible-first-rate-rise-wont-be-before-2024/news-story/5e811bd1c1b95add6f8a0e8c980705f1)  - Nov 16, 2021 address at Australian Business Economists.  The [**Cash Rate**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCash_Rate.htm) was then 0.10% on 16 Nov 21.  RBA increased it to 1.85% on 3 Aug '22 even though the causes for recent material cost increases are imported (Ukraine War and to a lesser extent COVID19).

[**‘They have to be held to account’: Future Fund chairman lashes RBA over rate rises**](https://www.smh.com.au/business/banking-and-finance/they-have-to-be-held-to-account-future-fund-chairman-lashes-rba-over-rate-rises-20220831-p5beal.html)**.**

Yours sincerely

Philip J. Johnston

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**Parliamentary Acts, MoU's and RBA Credit Cards Regulatory Decisions relied upon in this Public Submission**

***\**** [***Banking Act 1959***](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CRBA%5CC2016C00750-Banking_Act_1959_current_Feb-17.pdf)***-***  [***Banking Act 1959***](http://www7.austlii.edu.au/cgi-bin/viewdb/au/legis/cth/consol_act/ba195972/)**(222 pgs)**

***\**** [***Reserve Bank Act 1959***](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CRBA%5CReserve_Bank_Act_1959.pdf)***-  [Reserve Bank Act 1959](http://www.austlii.edu.au/au/legis/cth/consol_act/rba1959130/)* (57 pgs)**

***\**** [***Payment Systems (Regulation) Act 1998***](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CRBA%5CC2016C00591.pdf)**-  *[Payment Systems Board Act 1998](https://www.legislation.gov.au/Details/C2016C00591)* (33 pages)**

***\**** [***APRA Act 1998***](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CAPRA%5CAPRA_Act_1998.rtf)**-**  ***[APRA Act 1998](https://www.legislation.gov.au/Details/C2018C00058)*  (72 pgs)**

***\**** [***Australian Securities and Investments Commission Act 2001***](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CASIC%5Casaica2001529.rtf)**(394 pgs)**

\*          [***Competition and Consumer Act 2010***](https://www.legislation.gov.au/Details/C2017C00375)**(544 pgs)**

***\**** [**Memorandum of Understanding  -  Australian Competition and Consumer Commission and Reserve Bank of Australia** dated 8 Sept 1998](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CACCC%5Cmemorandum_of_understanding.htm)

\*          [**Memorandum of Understanding  -  Australian Prudential Regulatory Authority and Australian Securities and Investments Commission** dated 8 Oct 1998](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CASIC%5CMOU_ASIC-APRA_1998.htm)

\*          [**Memorandum of Understanding  -  Australian Prudential Regulation Authority and Reserve Bank of Australia** dated 12 October 1998](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CRBA%5CFiduciaryDuty%5Cjmr-98-rba-apra-mou.pdf)

**\*** [**Memorandum of Understanding  -  Australian Prudential Regulation Authority and Australian Competition and Consumer Commission** dated 30 November 1999](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CAPRA%5CMOA_APRA-ASIC_Nov%201999.htm)

***\**** [**Memorandum of Understanding  -  Australian Securities and Investments Commission and Reserve Bank Of Australia** dated 18 March 2002](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CASIC%5CMemo_Of_UnderstandingASIC_RBA.htm)

**\*** [**Credit Cards Regulatory Decisions by the RBA**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CRBA%5CAccessRegimes%5Ccredit_cards_regulatory_decision.htm)

**Primary Sections of Acts relied upon:**

         [**Section 50 ‘Control of interest rates’**](http://www7.austlii.edu.au/cgi-bin/viewdb/au/legis/cth/consol_act/ba195972/s50.html) of the [**Banking Act 1959**](http://www7.austlii.edu.au/cgi-bin/viewdb/au/legis/cth/consol_act/ba195972/)

         [**Section 10(2) 'Functions of Reserve Bank Board' of Reserve Bank Act 1959**](http://www7.austlii.edu.au/cgi-bin/viewdoc/au/legis/cth/consol_act/rba1959130/s10.html)

         [**Section 11(1) ‘Differences of opinion with Government on questions of policy’ of the Reserve Bank Act 1959**](http://www.austlii.edu.au/au/legis/cth/consol_act/rba1959130/s11.html)

         [**Division 2**—**Section 11 of the Payment Systems (Regulation) Act 1998**](http://www7.austlii.edu.au/cgi-bin/viewdoc/au/legis/cth/consol_act/psa1998333/s11.html)

         [**Division 3**—**Section 12 of the Payment Systems (Regulation) Act 1998**](http://www7.austlii.edu.au/cgi-bin/viewdoc/au/legis/cth/consol_act/psa1998333/s12.html)

         [**Division 4**---**Section 18** **of the** **Payments System (Regulation) Act 1998**](http://www.austlii.edu.au/au/legis/cth/consol_act/psa1998333/s18.html)

[**Declaration that the Writer is not conflicted**](file:///F%3A%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CWriter%5CDeclarationThatTheWriterIsNotConflicted.htm)**.**