Unit 5, 13th floor, *The Pavilion*
12 Glen St, Milsons Point, 2061
0434 715.861
scribepj@bigpond.com

25 June 2017

 Insert one of the two enclosed CDs in a Windows PC which will open at this **SecondLetterToMauriceBlackburn\_25-Jun-17.htm**
If using a MAC, or the enclosed USB stick drive, open this letter at **CreditCards\MauriceBlackburn\SecondLetterToMauriceBlackburn\_25-Jun-17.htm**

Mr. Andrew Watson

National Head of Class Actions
Maurice Blackburn
Level 10, 456 Lonsdale Street
Melbourne  VIC  3000                                   **(03) 9605.2735**

Dear Andrew

[**Class Action**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CClass_Actions%5CClass_Actions.htm) **representing 400,000 *circa*** [**Eligible *Persistent Revolver* Plaintiffs**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CClass_Actions%5CEligible_Persistent_Revolver_Plaintiffs.htm)

* **Section 4 of** [**Extensive Powers and Responsibilities of the RBA**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CExtensive_Powers_of_the_RBA.htm) **embellished to explicitly note the 'dedicated' Payment Systems Board's** [**payments system policy is directed to the greatest advantage of the people of Australia**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CSMH%5CReasons_for_the_decision_to_designate_EFTPOS.htm)
* [**Other Documents That Refer To 'Vulnerable (At Risk) Credit Cardholders**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5COtherDocReferToVulnerableAtRiskCardholders.htm) **that the Reserve Bank *'turned a blind eye'* to as far back as 15 years ago**

The[**Writer**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CWriter%5CWriter.htm)refers to his [**Intro Letter to Maurice Blackburn**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CMauriceBlackburn%5CIntroLetterToMauriceBlackburn_8-May-17.htm)dated 8 May 2017 and his[**Submission Letter**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CMauriceBlackburn%5CSubmission_Letter_to_Maurice_Blackburn_8-May-17.htm)dated 8 May 2017**.**

Section 4 (re the PSB) of [**Extensive Powers and Responsibilities of the RBA**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CExtensive_Powers_of_the_RBA.htm)now includes the below extract of the Payments System Board's obligation to (*ALL*) Australians regarding its "payments system policy":

      2.    [**The *Reserve Bank Act 1959* establishes the Payments System Board. Section 10B(3) of the Act states**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CSMH%5CReasons_for_the_decision_to_designate_EFTPOS.htm)**:**

1. **'**[**It is the duty of the Payments System Board to ensure, within the limits of its powers, that:**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CSMH%5CReasons_for_the_decision_to_designate_EFTPOS.htm)

a.    [**the Bank's payments system policy is directed to the greatest advantage of the people of Australia**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CSMH%5CReasons_for_the_decision_to_designate_EFTPOS.htm); and

b.    [**the powers of the Bank under the *Payment Systems (Regulation) Act 1998* and the *Payment Systems and Netting Act 1998* are exercised in a way that, in the Board's opinion, will best contribute to**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CSMH%5CReasons_for_the_decision_to_designate_EFTPOS.htm)**:**

i.      [**controlling risk in the financial system**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CSMH%5CReasons_for_the_decision_to_designate_EFTPOS.htm); and

ii.     [**promoting the efficiency of the payments system**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CSMH%5CReasons_for_the_decision_to_designate_EFTPOS.htm); and

iii.    [**promoting competition in the market for payment services, consistent
 with the overall stability of the financial system**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CSMH%5CReasons_for_the_decision_to_designate_EFTPOS.htm)**…'.**

The above inclusion has been made because the below extract from Section 3 re the [**Reserve Bank**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CReserveBankOfAustralia.htm)notes "other than its payments system policy":

             (1)   Subject to this Part, the Reserve Bank Board has power to determine the policy of the Bank in relation to any matter, other than its payments system policy, and to take such action as is necessary to ensure that effect is given by the Bank to the policy so determined.

Separately, below is an extract from Point 7 of the lengthy heading for my [**Submission Letter to Maurice Blackburn dated 8 May 2017**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CMauriceBlackburn%5CSubmission_Letter_to_Maurice_Blackburn_8-May-17.htm)**:**

**"**[**Other contributing Australian interested parties recognise protecting 'vulnerable consumers', but not the RBA**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CClass_Actions%5CRBA_hasn%27t_recognised_vulnerable_Credit_Cardholders.htm)**."**

If you click on the above URL and scroll down to '**Proponents in Australia that largely pursued the above BIS Five New Rights for credit and store card users'**, you will see details of five entities and their documents  dated between July 2010 and Aug 2015 that recognised the need to protect 'vulnerable', 'at risk' Credit Cardholders.

[**Other Documents That Recognise 'Vulnerable (At Risk) Cardholders**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5COtherDocReferToVulnerableAtRiskCardholders.htm)nowprovides extracts from five other authorities that expressed concern (dated as far back as 2002 and up to 2014) re the plight of vulnerable Credit Cardholders. Some of these reports/documents recognise that vulnerable Credit Cardholders were being targeted by Credit Card Issuers -

1.        [**SENATE STANDING COMMITTEES ON COMMUNITY AFFAIRS**](http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs),

2.        Commonwealth Government Consumer and Financial Literacy Taskforce,

3.        Ministerial Council on Consumer Affairs,

4.        Consumer Credit Legal Centre (NSW) Inc; and

5.        three academics from the [**Melbourne Law School, University of Melb**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CMelb_Institute%5CFinancial_literacy_of_young_Australians.htm)) .

Below are some pertinent extracts:

|  |
| --- |
| [**Chapter 9 - Other issues: Utilities, credit, gambling**](http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/Completed_inquiries/2002-04/poverty/report/c09)of [**SENATE STANDING COMMITTEES ON COMMUNITY AFFAIRS**](http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs)**-** [**REPORTS ON**](http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/Completed_inquiries) [**COMPLETED INQUIRIES  -  2002 - 2004**](http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/Completed_inquiries/2002-04)9.10    The Australian Consumers' Association (ACA) articulated this concern: ...we have become increasingly alarmed at levels of debt among Australian households. While that is certainly spread across all income levels and encompasses a variety of sources of credit – not just credit cards but personal loans and, of course, mortgages – **we are particularly concerned about the impact on low-income households who have quite high debt to income ratios and their capacity to manage that debt, particularly in the case of illness or other unexpected life events such as unemployment, and to maintain their capacity to stay out of bankruptcy in particular**.[[12]](http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/Completed_inquiries/2002-04/poverty/report/footnotes%22%20%5Cl%20%22c09f12)9.11    The Australian Consumers' Association stated that, based on numerous studies, it was single parents, renters and others on low incomes that experienced the most difficulties in managing credit card debt. The ACA noted that not only are increasing numbers of these people presenting to financial counsellors **with problems arising out of credit card use and other inappropriate levels of lending by financial institutions, but it is also exacerbating the degree to which they can be caught in a poverty cycle through debt traps**.**Not only are these people going through the stress of being in a situation of being overcommitted when it comes to their debt levels and their credit card use, but they then become targets for refinancing and the churning that goes on by a variety of agencies wishing to charge them fees to put them into other credit products and further exacerbate the extent to which they are caught in that debt trap**.[[13]](http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/Completed_inquiries/2002-04/poverty/report/footnotes%22%20%5Cl%20%22c09f13)[**Responsible lending practices in relation to consumer credit cards**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CAustConsumerLaw%5CRIS_2008%5CResponsible_lending_RIS_2008.htm)- **Prepared for the Ministerial Council on Consumer Affairs (now the** [**Consumer Affairs Foundation**](http://consumerlaw.gov.au/consumer-affairs-forum/)) - **August 2008 - State of New South Wales through the Office of Fair Trading, 2008** Government intervention therefore will aim to: 1.       Assist consumer choice of competitively priced credit card products;2.       Adequately protect consumers, **especially vulnerable or disadvantaged consumers, from lending practices which irresponsibly provide continuing credit at levels which cannot be repaid without substantial hardship**;  **2.1.3 Bankruptcies**A partner at chartered accountant Hall Chadwick, Mr Paul Leroy, was quoted in March 2007 **as saying that the inability to meet credit card payments is the biggest reason people go bankrupt**.8 **2.1.4 Impact on consumers and potential wider impact** The issue of concern in this paper is that a relatively small sector of the community is **vulnerable to exploitation by card issuers** and, because of a small income base, once in a situation where all income is totally committed to maintenance and servicing debt, **there is no way that the consumer can reverse the circumstances in which they have unwittingly become involved**.  This group of affected consumers will be referred to in this paper as “disadvantaged.” The personal and social impact of debt can be severe:  it can lead to family breakdown and violence, social exclusion and crime. Wesley Mission research conducted in 2006 from a random sample of 400 households reported that 58 percent of the people who responded said that financial stress had an impact on themselves, their family or the broader community in the past six years.  Of the total sample **5.8% said worry about money contributed to relationship breakdown; 3.5% said worry about money contributed to substance abuse; 3.3% said it contributed to increased or frequent gambling, and 1.3% said it contributed to violence in the relationship**. **As well, the ongoing commitment to interest payments on credit card debt has a major impact on a person’s long term capacity to provide for themselves in respect of housing, health, education and retirement.** It is clear that this commitment will exclude expenditure on other goods and services, some of which may be for essential items or health care. There may therefore be increased demands on all helping agencies whether government or community based, to assist those who are unable to provide for themselves, and has implications for pensions, health provision, housing and other government services.      The Commonwealth Government Consumer and Financial Literacy Taskforce was set up in February 2004 to develop a national strategy for consumer and financial literacy.  The Taskforce noted that “while not actually breaching any laws, **it is an unfortunate fact that many business operators in Australia continue to act in unethical or unhelpful ways to consumers.  A good example of this is the way in which some credit services are marketed towards vulnerable consumers.”** [**Submission to the 'Responsible lending practices in relation to consumer credit cards'**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CAustConsumerLaw%5Ccclc-cc-sub-final.pdf)**-  Nov 2008 from the Consumer Credit Legal Centre (NSW) Inc****Summary of submissions**•       CCLC considers credit card debt to be the largest single cause of debt problems in the consumer credit market, despite the lower amounts involved as compared to housing finance.•       While housing finance has a greater potential effect on the wider economy, credit card debt interacts with housing debt in obscure and insidious ways, negatively impacting on the ability of many borrowers to meet their mortgage commitments in the longer term.•       CCLC does not support any option short of additional regulation of lending in the credit card market.•       Responsible lending obligations should apply across the market, not just in relation to credit cards.•       Responsible lending legislation should provide an incentive for lenders to review their practices carefully to ensure they do not lend irresponsibly.•       Responsible lending legislation should provide a fair remedy for affected consumers.•       There should be a set period (perhaps 3 years) after which no further draw downs should be allowed on existing accounts, with borrowers who qualify for new accounts with higher minimum repayments being able to apply for alternative products as appropriate.The RIS refers to “a relatively small section of the community”.. “**vulnerable to exploitation by card issuers**” …”because of a small income base”. Of the callers analysed by CCLC from the 2004-2006 period, the caller’s income was low in 58% of cases (below $26,000 per annum) and medium (below $52,000) in a further 15%. Three per cent identified an income level of over $52,000 and the remainder (24%) did not specify their income level. This suggests that although credit card debt is a particular burden for very low-income consumers, it certainly extends into the middle-income bracket and beyond.[**The financial literacy of young Australians: An empirical study and implications for consumer protection and ASIC’s National Financial Literacy Strategy** - **Paul Ali, Malcolm Anderson, Cosima McRae and Ian Ramsay of Melbourne Law School, University of Melb** - **2014**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CMelb_Institute%5CFinancial_literacy_of_young_Australians.htm)While these objectives are laudable, Australian and international advocates **for vulnerable and low-income consumers** have warned that financial literacy, with its focus on consumer education, **should not be implemented at the expense of strong regulation**. Assisting consumers **who are particularly vulnerable to exploitation** and unmanageable debt requires more than financial literacy education. Further, consumer advocates submit it is erroneous to assume that all detriment, **particularly for low-income and vulnerable consumers, is caused by low financial  literacy.** |

Mindful of the above evidence of vulnerable Credit Cardholders (as far back as 2002 *and probably earlier*) and the below extract of **Section 3** and **Section 4** of [**Extensive Powers and Responsibilities of the RBA**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CExtensive_Powers_of_the_RBA.htm)to determine policy to the greatest advantage of the people of Australia, it is puzzling that the [**Reserve Bank**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CReserveBankOfAustralia.htm)  -

A.         continued to ignore such overwhelming evidence that Credit Cardholders, many with poor [**Financial Literacy Skills**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CFinancial_Literacy.htm)**,** namely[***Revolvers***](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CClass_Actions%5CTransactors_and_Revolvers.htm)were paying the vast bulk of [**Interest**](file:///C%3A%5CUsers%5CPhil%5CMy%20Documents%5CMy%20Webs%5CMuggaccinos%5CSenex%5CCreditCards%5CDefinedTerms%5CInterestIncomeAndLatePaymentFeesFromCreditCards.htm)and[**Late Payment Fees**](file:///C%3A%5CUsers%5CPhil%5CMy%20Documents%5CMy%20Webs%5CMuggaccinos%5CSenex%5CCreditCards%5CDefinedTerms%5CLate_Payment_Fee.htm)and[***Transactors***](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CClass_Actions%5CTransactors_and_Revolvers.htm)were enjoying their [**Lines of Credit**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CRevolving_Line_Of_Credit.htm)at no material cost and some with a net benefit due to [**Rewards Programs**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CRewards%20Programs.htm); and

B.         failed ([**as obligated under Section 11 of the Reserve Bank Act 1959**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CRBA%5Creserve_bank_act_1959__sect_11.htm)) to inform the Commonwealth Government that the [**Reserve Bank**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CReserveBankOfAustralia.htm)was obligatedto [**Determine Standards**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CRBA%5CAccessRegimes%5CDetermine_Standards.htm) to -

            (i)        ensure that the [**User Pays Principle**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CUser_Pays_Principle.htm)applied to [**Credit Card Products**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCredit_Card_Products.htm); and

            (ii)       re-regulatea max[**Credit Card**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCredit_Cards.htm)interest rate/s during the 25 years since [**LOAN RATE STICKINESS: THEORY AND EVIDENCE**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5Crba%5Crdp9206.pdf)was published in June 1992 because the spread between[**Credit Card Issuers**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCredit_Card_Issuer.htm)**'** [**Wholesale Cost Of Funds**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCash_Rate.htm)has increased from less than 1% in April 1985 ([**when the Reserve Bank removed the 18% cap on the maximum Credit Card interest rate**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CRBA%5Crdp9206.pdf)) to the current spread of 18.5% ([**Overnight Cash Rate**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCash_Rate.htm)of 1.5% and the [**Credit Card**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCredit_Cards.htm)[**Purchase Interest Rate**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CPurchase_Interest_Rate.htm)of 20%) [max [**Cash Advance**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CCash_Advance.htm)interest rate in April 2017 is 29.49% representing a spread of 28%].

**3.        Reserve Bank's *"catch-all"* responsibility, pursuant to the below** [***Reserve Bank Act (1959), Part II, Section 10* ''Functions of Reserve Bank Board"**](http://www.austlii.edu.au/au/legis/cth/consol_act/rba1959130/s10.html)**, to determine the policy of the Bank in relation to any matter, other than its payments system policy, and to take such action as is necessary to ensure *'inter alia'* (2)(c) below:**

             (1)   Subject to this Part, the Reserve Bank Board has power to determine the policy of the Bank in relation to any matter, other than its payments system policy, and to take such action as is necessary to ensure that effect is given by the Bank to the policy so determined.

             (2)   It is the duty of the Reserve Bank Board, within the limits of its powers, to ensure that the monetary and banking policy of **the Bank is directed to the greatest advantage of the people of Australia** and that the powers of the Bank under this Act and any other Act, other than the [***Payment Systems (Regulation) Act 1998***](http://www.austlii.edu.au/au/legis/cth/consol_act/psa1998333/), the [***Payment Systems and Netting Act 1998***](http://www.austlii.edu.au/au/legis/cth/consol_act/psana1998319/)and Part 7.3 of the [***Corporations Act 2001***](http://www.austlii.edu.au/au/legis/cth/consol_act/ca2001172/), are exercised in such a manner as, in the opinion of the Reserve Bank Board, will best contribute to:

                    (a)        the stability of the currency of Australia;

                    (b)        the maintenance of full employment in Australia; and

                    (c)        **the economic prosperity and welfare of the people
 of Australia.**

1. [**The *Reserve Bank Act 1959* establishes the Payments System Board. Section 10B(3) of the Act states**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CSMH%5CReasons_for_the_decision_to_designate_EFTPOS.htm)**:**
	1. **'**[**It is the duty of the Payments System Board to ensure, within the limits of its powers, that:**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CSMH%5CReasons_for_the_decision_to_designate_EFTPOS.htm)
		1. [**the Bank's payments system policy is directed to the greatest advantage of the people of Australia**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CSMH%5CReasons_for_the_decision_to_designate_EFTPOS.htm)**; and**
		2. [**the powers of the Bank under the *Payment Systems (Regulation) Act 1998* and the *Payment Systems and Netting Act 1998* are exercised in a way that, in the Board's opinion, will best contribute to**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CSMH%5CReasons_for_the_decision_to_designate_EFTPOS.htm)**:**
			1. [**controlling risk in the financial system**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CSMH%5CReasons_for_the_decision_to_designate_EFTPOS.htm)**; and**
			2. [**promoting the efficiency of the payments system**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CSMH%5CReasons_for_the_decision_to_designate_EFTPOS.htm)**; and**
			3. [**promoting competition in the market for payment services, consistent with the overall stability of the financial system**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CSMH%5CReasons_for_the_decision_to_designate_EFTPOS.htm)…'.

To the knowledge of the [**Writer**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CWriter%5CWriter.htm), unlike the [**UK Credit Card Regulator,** **BIS**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CClass_Actions%5CRBA_hasn%27t_recognised_vulnerable_Credit_Cardholders.htm), the [**Reserve Bank**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CDefinedTerms%5CReserveBankOfAustralia.htm)has never acknowledged the need to protect 'vulnerable', 'at risk' Credit Cardholders, but has recognised the financial burden born by [***Revolvers***](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CClass_Actions%5CTransactors_and_Revolvers.htm)and specifically [***Persistent Revolvers***](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CCreditCards%5CClass_Actions%5CPersistent_Revolvers.htm) (details/dates noted in those two definitions).

Yours sincerely



[**Phil Johnston**](file:///C%3A%5CUsers%5Cscribepj%5CDocuments%5CMy%20Web%20Sites%5CMuggaccinos%5CSenex%5CCreditCardsold%5CDefinedTerms%5CWriter.htm) **aka** [***Bank Teller***](http://www.muggaccinos.com/ChoresnCrew/Scribe/Scribe.htm)