Dear Ryan,

AFG is concerned about the lack of clarity with this exposure draft. It is impossible to anticipate the effect of the legislation without the detailed draft regulations. For example, page 3 definition of credit services entity includes exempt persons however page 4 definition of leviable entity includes a credit services entity but excludes exempt entities prescribed by the regulations.

As you would be aware from our previous involvement with this process we have a keen interest in the passage of this legislation and would appreciate the opportunity to be involved in any further consultation.

Kind regards, Alison.

Alison Clarke

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