

24 February 2006

Committee Secretary
Senate Finance and Public Administration Committee
Department of the Senate
Parliament House
CANBERRA ACT 2600

fpa.sen@aph.gov.au

Dear Secretary

Inquiry into the Electoral and Referendum Amendment (Electoral Integrity and Other Measures) Bill 2005

American Express welcomes the opportunity to provide comment to the Senate Finance and Public Administration Committee (Committee) inquiry into the above Bill.

American Express, with headquarters in New York, operates a global card, travel and payments business. The Company is one of the largest global payment providers with a customer base of 65.4 million Cardmembers and reported revenues in excess of \$29 billion. (The 2004 Company Annual Report). American Express has been operating in Australia for more than 50 years and today issues corporate and consumer credit and charge Cards targeted at affluent Australians. Our Card business portfolio comprises approximately 10% share of the Australian market. American Express does not own or operate a proprietary branch network and has no intention to do so in the future.

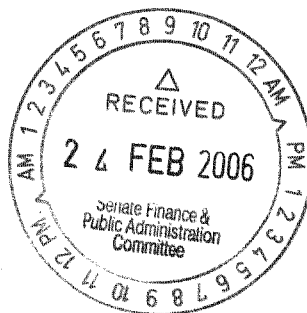
American Express supports the amendments in the Bill which will allow access to the electoral roll for the purposes of verifying the identity of customers in accordance with the *Financial Transaction Reports Act 1988* (FTRA). Robust customer identification measures are essential to ensuring that financial institutions can effectively manage the risks of fraud, money laundering and terrorist financing in addition to meeting their obligations under the FTRA. Allowing access to the electoral roll for these purposes will assist by providing an additional identity check which will significantly strengthen customer identification and verification processes made available to financial institutions.

We also draw the Committee's attention to the *Exposure Draft Anti Money Laundering and Counter-Terrorist Financing Bill 2005* (draft AML/CTF Bill) which is proposed to replace the Financial FTRA. We note that similar provisions should be included in the AML/CTF legislation to ensure similar access to the electoral roll for identification purposes once the new regime is passed into law. Allowing financial institutions access to verify customer information via the electoral roll is a powerful tool which will assist in the prevention of various financial crimes including money laundering, identity theft and fraud.

We thank you for your consideration of this matter. Please do not hesitate to contact me on (02) 9271 2778 should you have any queries in relation to this matter.

Yours sincerely

Brett Knight
Head of Compliance & Ethics
American Express



American Express
Australia Limited
175 Liverpool Street
GPO Box 1582
SYDNEY NSW 1131
AUSTRALIA