

I refer to section 2.1.2 of the issues paper.

I submit the \$40,000 threshold is too low. it was set in 1986. I think \$100,000 is reasonable in 2016 as a consumer can include a business. The ACL provides for minimum standards in transactions which should apply to individual and business dealings. The amount should be able to be increased by regulation.

I also submit the threshold should be assessed over a time period for multiple services under one contract eg a travel contract for a business where there may be many trips and the contract may continue until terminated. The current definition is unclear as to how to apply the threshold in a long term contract - the price may exceed \$40,000 over the contract term. I think one year from the commencement date and each anniversary is reasonable.

These submissions are my own views and not made on behalf of any past, present or future employer.