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[VIA EMAIL – statistics@apra.gov.au]

Manager, Banking Statistics  
Australian Prudential Regulation Authority  
GPO Box 9836  
**SYDNEY NSW 2001**

Dear Sir/Madam,

**Points of Presence Statistics – Discussion Paper**

Thank you for the opportunity to make a submission to APRA on the Points of Presence (PoP) Discussion Paper dated September 2015.

In summary, Suncorp Bank (the Bank) sees the PoP Statistics as adding value and supports the continued collation and publication of the information. Our key points are below:

- PoP statistics are valuable, but agree data needs to be streamlined;
- Geocodes (Latitude & Longitude) information should be included – making the data value adding and reportable in meaningful ways;
- Clearly define “branch” i.e. Is a bank site without tellers, but has self-service technology considered a branch?; and
- Agree with aligning to the Australian Statistical Geography Standard (ASGS) remoteness definition – providing an opportunity to align to the new Australian Bankers Association (ABA) definition of remoteness relating to branch closures.

The Bank’s detailed feedback and recommendations are as follows:

1. *APRA is proposing two options for the future of the Points of Presence statistics and data collection:*
  - a) *streamline the Points of Presence statistics and data collection; or*
  - b) *cease the Points of Presence statistics and data collection.*

**Response:** Option a). The PoP Data is valuable, however, agree it can be streamlined.

2. *Streamline the PoP statistics - There are three main changes to the statistics APRA would publish:*

(a) *branches, other face to face points of presence, ATMs and EFTPOS terminals*

**Response:** Supported. Can a site be classified as a branch under the following if accepting cash & other deposits and providing change is via Self Service Technology?

Branch level of service comprises all service channels that meet the following minimum criteria:

- accepts cash and other deposits (including business deposits) and provides change;
  - facilitates the keeping of accounts for customer access, including the provision of account balances;
  - opens and closes accounts;
  - can facilitate or arrange the assessment of the credit risk of existing and potential customers; and offers additional services in the one establishment such as financial services, business banking and specialist lending.
- (b) *more useful information about locations – the addition of geocodes for each point of present at the ADI-level, specifically latitude and longitude;*

**Response:** Supported

- (c) *additional information about remoteness – replacing the Accessibility/Remoteness Index of Australia (ARIA) with the ASGS Remoteness Areas and publishing statistics in five new remoteness categories*

**Response:** Supported – this information needs to align with the ABA definition of remoteness or at least be comparable.

3. *Streamline the PoP data collection – APRA proposed to amend the ARF396.0 in two ways :*
- (a) *limit the types of service channels that must be reported to:*
- a) - branches;
  - b) - other face-to-face points-of-presence;
  - c) - ATMs; and
  - d) - EFTPOS terminals.
- (b) *requiring that locational data in reported in geocode format. This would involve reporting the longitude and latitude coordinates for each branch, other face-to-face service channel and ATM instead of the current town/suburb, postcode and state format. ADIs would not be required to report the geocode location of each EFTPOS terminal, just the state.*

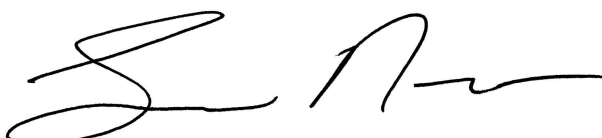
**Response:** Any changes to ARF396.0 will require an appropriate timeframe to implement (source data points) and testing before this can be placed into production.

4. *Cease the publication of the PoP statistics - If the feedback on the benefit of the PoP statistics does not sufficiently outweigh the costs to ADIs of reporting the data to APRA, APRA will cease the PoP statistics and consequently, ARF 396.0. Should APRA cease to publish the statistics, users may be able to compile similar information through other publically available sources, including the ABS, Department of Health and ADIs' websites.*

**Response:** Not supported. Continue with the statistics with the refinements outlined above.

If you wish to discuss any aspect of this submission, or require further information, please do not hesitate to contact me on (07) 3330 0154.

Yours sincerely,



Sumit Narayan  
Advisor - Group Regulatory Affairs

Copy to:  
Jo Canavan, Executive Manager Governance & Regulatory Change