



**CHARTERED SECRETARIES
AUSTRALIA**

Leaders in governance

29 March 2005

Mr Greg Yanco
National Manager, Trading Market Development
Australian Stock Exchange Ltd
Level 6, 20 Bridge Street
Sydney NSW 2001

Dear Mr Yanco,

Chartered Secretaries Australia (CSA) is Australia's peak membership body for governance and compliance with over 8,000 members in Australia representing the majority of public companies listed on the Australian Stock Exchange. Members of CSA regularly deal on a day-to-day basis with the ASX and ASIC and have a thorough working knowledge of the operations of the markets, the needs of investors and the law and regulation dealing with market practices and independence. In addition, representatives from the ASX and ASIC regularly address members at our seminars and conferences.

CSA would like to take the opportunity to express its concern over the ASX proposal (in the publication "ASX Market Reforms – Enhancing the Liquidity of the Australian Equity Market") to remove the real-time display of individual broker identification numbers ('broker ID') from SEATS trading screens. CSA is concerned that this initiative will prevent listed companies from accessing important trading information on their own shares, on a timely basis.

While CSA appreciates ASX's view that a move to greater anonymity provides a more equitable trading environment for investors than presently applies, we believe the ASX should be providing issuers with improved access to trading information in their company's shares rather than seeking to further restrict access.

In the course of enforcing continuous disclosure rules the ASX commonly issues price queries to companies experiencing unusual price fluctuations or trading volumes. Companies often refer to broker-trading reports when investigating the basis for these unusual trading trends. By further restricting access to broker trading data the ASX may reduce the capacity of companies to make a meaningful response to price queries and may disadvantage potential target companies through suppression of timely data on predatory trading activity.

CSA encourages the ASX to consider ways in which listed companies may be permitted to access broker trading information on their own shares on a real-time basis in the future. This information should ideally be available through a secure website (such as ASX online), however, an interim solution may be for the ASX to provide this information to companies electronically on request.

We would be happy to discuss this issue further with you if you wish.

Yours sincerely

Tim Sheehy
Chief Executive