

Lähetäjä: Paul Meehan [mailto:paul.meehan@change group.com
<mailto:paul.meehan@change group.com>]
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Vastaanottaja: Kirjaamo Fiva <kirjaamo@finanssivalvonta.fi
<mailto:kirjaamo@finanssivalvonta.fi> >
Aihe: FSA Public Request

Dear Finanssivalvonta

The ChangeGroup ATMs Ltd would like to submit the following response to questions raised below, regarding the current guidance given by the FSA on the ATM market.

1. Do you consider the previous guidance on financial supervision to be equivalent to a changing market situation?
2. In what way would a corresponding national levy be justified in a changing market situation?
3. What are the effects of different options?

ChangeGroup ATMs considers the previous guidance to be the right approach because it has definitely had a positive effect on the market. It is important that the people in Finland have the freedom of choice as to the how they want to pay for goods and services. This choice includes all forms of payment from debit/credit cards, bank transfers and cash. The current guidance ensures all ATM suppliers are able to provide their services on an equal basis and this will lead to an increase in the availability of ATMs throughout Finland.

ChangeGroup ATMs provides an important and much needed cash service at Vantaa Airport and also the regional airports of Oulu, Rovaniemi and Kittilä. We are able to provide the free to use service to Finnish nationals due to the current guidance.

If a national levy is introduced it will have a detrimental effect on the benefit and convenience that Finnish nationals currently enjoy in being able to draw cash as they require. If a levy is introduced, it may result in a number of ATMs being removed because they wouldn't be viable anymore due to a reduction in usage. This will result in considerable inconvenience for the Finnish public which would have to look further afield for an ATM. We are also concerned that will then have a knock on effect on local businesses where the ATMs were located previously because most people tend to withdraw money to use near to where the ATMs are sited.

If a National levy has to be introduced in Finland, it should be done in a way all ATMs in Finland should adhere to the levy on an equal basis to create a fair and level playing field. We believe that a competitive market place will see further increases in the availability of ATMs throughout Finland giving the Finnish public and tourists a greater choice.

In the United Kingdom alone, a competitive market place and since independent ATM providers were introduced, the availability of ATMs has doubled thereby allowing the UK public the freedom to choose their preferred payment method.

Current guidance given by the FSA has certainly had a positive effect on the market and which over the coming years will see increases in the number of ATMs in Finland. This will give a greater and wider choice of payment method for the local public and tourists alike and this will also bring significant benefit to Finland.

Kind regards

Paul Meehan, Director

Direct: +442036758207 Mobile: +447768464613

1 Ely Place, London EC1N 6RY United Kingdom

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