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Date of submission: Friday, 3 June 2022

Your submission for this review:

This response is provided by LodgeX Legal (LodgeX). LodgeX Legal is an eSettlement agency providing eSettlement and eLodgement services to solicitors, conveyancers, financial institutions, developers and others seeking to register property transactions via an ELNO. It offers an alternative solution for those parties which do not wish to directly deal with an ELNO. LodgeX occupies a unique role in the eConveyancing landscape. Not only is it independent of each ELNO, it is also representative of a broad cross section of users. Its largely agency role enables it to appreciate the differing perspectives, needs and requirements of the various segments of the eConveyancing industry. For this reason we are well placed to comment on the matters raised in the Terms of Reference. LodgeX makes the following comments in relation to the proposed Terms of Reference: 1. We accept term item 1 fees inter ELNOs should operate to: (a) incentivize participating ELNOs to continue to build out interoperability; (b) reflect the commensurate risk and responsibility of each ELNO; (c) minimize the risk of a participating ELNO obtaining access at less than consumer market access pricing (d) balance benefit and access for all consumers 2. We accept term item 2 -In addition, the terms should: (a) reference appropriate methodology for pricing; (b) define the basis of fee charging by workspace or item/transaction type; (c) set maximum levels for pricing and consider capping; (d) investigate whether pricing disclosure to consumers will be required; (e) consider the impact of minimum interoperability functionality pricing and the introduction of incentives/disincentives pricing commensurate with increased functionality. 3. Subject to the outcomes and recommendations of the review then appropriate amendments to the MOR would be in order. LodgeX considers that, given its unique role in the eConveyancing industry it should be included as a key stakeholder as part of the consultation.