

3 June 2010

Ms Ann Kinnear
National Electronic Conveyancing Office

By email: ann.kinnear@necs.gov.au

Dear Ms Kinnear

**National Electronic Conveyancing Office Issues Paper, 26 March 2010:
*Operational Roles Revisited***

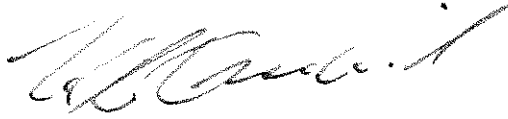
The Law Society of Western Australia has considered the proposal for a new category of Subscriber, 'Process Subscriber', a special category to cater for Mortgage Processors.

The Law Society of Western Australia responds below to the questions posed in the NECS Feedback Form.

- Q1 What is your general view on a special category of Subscriber for mortgage processors?**
- A1 The Law Society of Western Australia does not support the creation of this special category of Subscriber.
- Q2 How will your business or practice be affected by the new category of Subscriber for unregulated mortgage processors and the elimination of Contract Industry Certifiers?**
- A2 The Law Society of Western Australia is of the opinion that the creation of the new category for unregulated Mortgage Processors will seriously impact on the integrity and credibility of NECS and may have a serious impact on the uptake of NECS.
- Q3 Do you believe the recommendations are in the best interests of all parties?**
- A3 See A2.
- Q4 What is your preference for accommodating mortgage processors and locum practitioners in NECS?**
- A4 The Law Society of Western Australia believes that it can accommodate locum practitioners on consultation with its Professional Indemnity Insurers by developing best practice rules.

Mortgage Processors will either need to become regulated ie. incorporate as legal corporations or alternatively be restricted to acting as Certifiers approved by their Subscriber clients.

Yours faithfully

A handwritten signature in black ink, appearing to read 'H. Quail', written in a cursive style.

Hylton Quail
President