

9 July 2009

Alice Cope  
Adviser, Issuers (Melbourne)  
ASX Markets Supervision Pty Ltd  
Level 45  
South Tower  
525 Collins Street  
MELBOURNE VIC 3000

Sent via email: [alice.cope@asx.com.au](mailto:alice.cope@asx.com.au)

Dear Alice

**Response to ASX Query: Appendix 3X – Initial Director's Interest Notice**

With regards to your letter of 7 July 2009 I respond as follows:

1. The Appendix 3X was inadvertently lodged late as the person designated with primary carriage and responsibility for such matters was unexpectedly away from the office. As soon as I became aware of the issue, I undertook to complete and lodge the form with ASX as quickly as possible.
2. CommQuest takes its responsibilities of complying with its continuous disclosure obligations under the ASX Listing Rules seriously. I will ensure that the directors remain fully aware of the disclosure obligations under listing rule 3.19A and that continuous communication between the Company and its directors is maintained to ensure full and timely compliance with these requirements.
3. The breach referred to in your letter is an isolated event, and arrangements have now been implemented within the Company so that circumstances described in item 1 are not repeated. This will be achieved through ensuring reporting obligations under ASX Listing Rules will be managed by other members of staff when the designated person with primary responsibility is away from the office. I will personally have oversight of the delegation of this task in the event the resource responsible is absent and have implemented systems to alert me if this is the case.

I trust that this letter satisfies your query. However, if you require further information please contact me.

Yours sincerely



Jonathon Meredith-Smith  
Company Secretary/Chief Financial Officer  
CommQuest Limited



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7 July 2009

Mr Jonathon Meredith-Smith  
Company Secretary / Chief Financial Officer  
Commquest Limited  
Level 3, 554 Church Street  
RICHMOND VIC 3121

By email only

Dear Jonathan

**Commquest Limited (the "Company") Appendix 3X – Initial Director's Interest Notice**

We refer to the following;

1. The Appendix 3X lodged by the Company with ASX on 6 July 2009 for Mr Roger Sharp.
2. Listing rule 3.19A which requires an entity to tell ASX the following:
  - 3.19A.1 The notifiable interests of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) at the following times.
    - On the date that the entity is admitted to the official list.
    - On the date that a director is appointed.The entity must complete Appendix 3X and give it to ASX no more than 5 business days after the entity's admission or a director's appointment.
  - 3.19A.2 A change to a notifiable interest of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust). The entity must complete Appendix 3Y and give it to ASX no more than 5 business days after the change occurs.
  - 3.19A.3 The notifiable interests of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) at the date that the director ceases to be a director. The entity must complete Appendix 3Z and give it to ASX no more than 5 business days after the director ceases to be a director.
3. Listing rule 3.19B which states as follows.

An entity must make such arrangements as are necessary with a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) to ensure that the director discloses to the entity all the information required by the entity to give ASX completed Appendices 3X, 3Y and 3Z within the time period allowed by listing rule 3.19.A. The entity must enforce the arrangements with the director.

4. The Companies Update dated 27 June 2008, reminding listed entities of their obligation to notify ASX within 5 business days of the notifiable interests in securities held by each director and outlining the action that ASX would take in relation to breaches of listing rules 3.19A and 3.19B.

As the Appendix 3X indicates that the director was appointed on 24 June 2009 it appears that the Appendix 3X should have been lodged with ASX by 1 July 2009. As the Appendix 3X was lodged on 6 July 2009, it appears that the Company may be in breach of listing rules 3.19A and/or 3.19B.

Please note that ASX is required to record details of breaches of the listing rules by listed companies for its reporting requirements.

ASX reminds the Company of its contract with ASX to comply with the listing rules. In the circumstances ASX considers that it is appropriate that the Company make necessary arrangements to ensure there is not a reoccurrence of a breach of the listing rules.

Having regard to listing rules 3.19A and 3.19B and Guidance Note 22: "Director Disclosure of Interests and Transactions in Securities - Obligations of Listed Entities", we ask that you answer each of the following questions:

1. Please explain why the Appendix was lodged late.
2. What arrangements does the Company have in place with its directors to ensure that it is able to meet its disclosure obligations under listing rule 3.19A?
3. If the current arrangements are inadequate or not being enforced, what additional steps does the Company intend to take to ensure compliance with listing rule 3.19B?

Your response should be sent to me by return e-mail or by facsimile on facsimile number (03) 9614 0303. It should not be sent to the Company Announcements Office.

A response is requested as soon as possible and, in any event, not later than half an hour before the start of trading (ie before 9.30 a.m. A.E.S.T.) on Friday, 10 July 2009.

Under listing rule 18.7A, a copy of this query and your response will be released to the market, so your response should be in a form suitable for release and must separately address each of the questions asked. If you have any queries or concerns, please contact me immediately.

Yours sincerely,

*Sent electronically without signature*

Alice Cope  
**Adviser, Issuers (Melbourne)**