



17 July 2009

Greg Coulson,  
Adviser, Issuers (Perth)  
Australian Securities Exchange (ASX)  
Fax: 9221 2020

Dear Greg

**Response - Appendix 3Y - Change of Director's Interest Notice**

In response to your letter dated 15<sup>th</sup> July 2009, I provide the following:

1. *Please explain why the Appendix 3Y was lodged late.*

The late lodgment of the statements was an administrative oversight. The company has reviewed its internal policies.

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?*

The company has a written agreement in place with each Director setting out the disclosure obligations under listing rule 3.19A and the obligations of each director to provide relevant information within the prescribed time.

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?*

The Company believes the current arrangements are adequate to capture changes in shareholdings, and have been modified to capture changes to option holdings.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "M. Catina".

Maurice Catina  
Company Secretary  
Lumacom Limited

**LUMACOM LTD**

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**ASX**

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15 July 2009

Maurice Catina  
Company Secretary  
Lumacom Limited  
Suite 1, 346 Barker Road  
SUBIACO WA 6008

By Fax – 08 9201 2108

Dear Maurice

**Lumacom Limited (the "Company")**  
**Appendix 3Y – Change of Director's Interest Notice**

We refer to the following:

1. The Appendix 3Y lodged by the Company with ASX Limited ("ASX") on 15 July 2009 for Chris Daws; and
2. Listing rule 3.19A which requires an entity to tell ASX the following:
  - 3.19A.2 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) change the entity must complete Appendix 3Y and give it to ASX no more than 5 business days after the change occurs.
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 listings rules 3.19A and 3.19B.

The Appendix 3Y indicates that a change in the director's relevant interests occurred on 20 November 2008. As the Appendix 3Y was lodged on 15 July 2009, it appears that the Company may be in breach of listing rules 3.19A and/or 3.19B. It also appears that there may have been a breach of S205G of the Corporations Act by the directors concerned.

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:

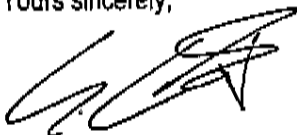
1. Please explain why the Appendix 3Y was lodged late.
2. What arrangements does the Company have in place with its directors to ensure that it is able to meet its disclosure obligations under listing rule 3.19A?
3. If the current arrangements are inadequate or not being enforced, what additional steps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

Your response should be sent to me by facsimile on facsimile number (08) 9221 2020. 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 4:00pm W.S.T on **Friday, 17 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 should separately address each of the questions asked. If you have any queries or concerns, please contact me immediately

Yours sincerely,



Greg Coulson  
Senior Adviser, Issuers (Perth)