

09 October 2020



Dear ACCC Communications Group,

RE: Draft Division 12 and Internet Activity Record Keeping Rules (RKR)

Thank you for the opportunity to provide comments on the draft RKR.

As raised in our submission to the first stage of this review, we support the goal of streamlining the rules to reflect current communications markets and consumer preferences while reducing the regulatory burden where appropriate.

We strongly supported the proposal to move many of the included metrics to reporting on an aggregate basis. In light of this, the addition of a new disaggregation to Division 12 reporting, dividing call minutes, number of calls, and number of SMS into originating and terminating, seems counter to the original intention of the review. We note the ACCC may consider there to be some regulatory benefit for overall data collection on these services (despite the increase of unlimited plans and decline in usage of services such as SMS).

However, we do not see that there has been any evidence provided on the benefit of disaggregating this data into originating and terminating. We were also unable to identify any submissions to the review which recommended the addition of this disaggregation. This is an additional regulatory burden without clear need or benefit.

This is our main comment on the drafts. In addition, we would encourage the ACCC to reconsider our original request for further clarification on the definition of Home Wireless Broadband.

We support the removal of the requirement to provide bills, as this reflects the transparency and availability of pricing information online. We also appreciate the ACCC's amendment of Division 12 to allow a 'responsible officer' to certify the submission, and other changes made to streamline and remove regulatory duplication.

Communications Alliance and its members would be pleased to engage further with the ACCC on this review. Please do not hesitate to contact me with any questions.

Yours sincerely,

Jessica Curtis
Manager, Policy and Regulation