

ACCAN Review
Department of Communications and the Arts
PO Box 13310, Law Courts
MELBOURNE VIC 8010

RE: Consumer representation: Review of section 593 of the Telecommunications Act 1997

As the policy authority and industry self-regulatory body for .au domain names, I am pleased to provide a brief submission on the review of section 593 of the Telecommunications Act 1997.

It is not appropriate for auDA to make any comments regarding the performance of ACCAN, due to our separate relationship with the organisation, however I would like to make some general comments regarding consumer advocacy as it relates to the digital sector.

Regulation of the digital sector is complex. There are a multitude of international and domestic regulations, model rules and aspired best practice. Whilst Australia ranks highly compared to international competitors on digital governance, there remains challenges associated with digital connectivity, education and inclusion. Projects and policy priorities such as improving the awareness of digital rights of consumers, administration of digital assets following death and improving digital literacy amongst socio-disadvantaged and remote communities are necessary and laudable.

Consequently auDA supports the retention of a model where such functions, programs and projects are funded from Government. auDA further supports a model where government funding is supplemented by industry funds. Due to the specific considerations and unique needs of the digital space, auDA further supports that such administration and program functions are carried out by a specialist, digital advocacy group.

It must be noted that auDA has in the past administered its own program with similar goals through the auDA Foundation. As a newly appointed CEO of 3 months, I am on behalf of the organisation evaluating this project delivery model, similarly along the lines of this review, and although I believe that there are improvements to my own model, these types of programs are best delivered by the NFP sector due to efficiencies associated with cost and relationships with project participants.

Whilst the lines of general consumer advocacy versus providing programs to those who most require such services potentially can be blurred, I thoroughly believe that properly administered NFP organisations can achieve greater impact than government bodies.

Overall auDA is supportive of retention of an out-sourced model, with appropriate governance, performance management and policy impact models in-place.

I would be delighted to provide any further information as necessary.

Sincerely

Cameron Boardman
CEO, auDA

25/11/2016