



INTERNET ASSOCIATION OF AUSTRALIA
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07 July 2022

To: Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

By submission: <https://www.acma.gov.au/consultations/2023-06/fees-2023-24>

RE: Draft Cost Recovery Implementation Statement: Fees for Radiocommunications, Telecommunications, and Broadcasting Services 2023-24

DRAFT TELECOMMUNICATIONS INSTRUMENTS

Thank you for the opportunity to express the Internet Association of Australia (IAA) perspective on the Draft Cost Recovery Implementation Statement: Fees for Radiocommunications, Telecommunications, and Broadcasting Services 2023-24.

Many of IAA's members are small to medium sized Internet Service Providers (ISPs) with many providing both internet and classical telecommunications services. Our response is primarily to represent the perspective of our members, as well as in support of the general well-being of the internet and the internet industry.

We acknowledge and appreciate the work been done by ACMA in relation to regulating telecommunications services and the continued stakeholder consultation that the ACMA is engaging in with relation to fees pertaining to the industry. We also recognise that given changes to fees only came into effect recently from late 2022, the ACMA has only undertaken a limited review of its current hourly rates.

However, we reiterate our concerns raised in our submission to the 2022-23 Cost Recovery Implementation Statement (**CRIS**) that the CRIS does not provide enough detail or information to facilitate understanding of the ACMA's work and productivity to justify its fees.

For example, we would appreciate a detailed breakdown of the actual cost recovery revenue and expenses set out in Table 4 under section 7A to provide greater transparency and assurance in the appropriateness of the rates being set, and the efficiency of the ACMA.

Once again, IAA appreciates the opportunity to engage with the ACMA in these discussions. We look forward to continuing to work with the ACMA, and other stakeholders to ensure the efficient and effective provision of services by the ACMA for the internet industry.

ABOUT THE INTERNET ASSOCIATION OF AUSTRALIA

The Internet Association of Australia (IAA) is a member-based association representing the Internet community. Founded in 1995, as the Western Australian Internet Association (WAIA), the Association changed its name in early 2016 to better reflect our national membership and growth.

Our members comprise industry professionals, corporations, and affiliate organisations. IAA provides a range of services and resources for members and supports the development of the Internet industry both within Australia and internationally. Providing technical services as well as social and professional development events, IAA aims to provide services and resources that our members need.

IX-Australia is a service provided by the Internet Association of Australia to Corporate and Affiliate members. It is the longest running carrier neutral Internet Exchange in Australia. Spanning six states and territories, IAA operates over 30 points of presence and operates the New Zealand Internet Exchange on behalf of NZIX Inc in New Zealand.

IAA is also a licenced telecommunications carrier, and operates on a not-for-profit basis.

Yours faithfully,

Narelle Clark
Chief Executive Officer
Internet Association of Australia