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By submission: <https://www.acma.gov.au/consultations/2023-02/acma-compliance-priorities-2023-24>

RE: ACMA Compliance Priorities 2023-24

Thank you for the opportunity to express the Internet Association of Australia's (**IAA**) perspective on the Compliance Priorities 2023-24 Consultation Paper.

IAA is a member-based association representing Australia's Internet community. Our membership is largely comprised of small to medium sized Internet Service Providers that are subject to various legislation regulating the telecommunications sector, some of which are enforced by the ACMA.

We appreciate the ACMA's efforts to decrease consumer harm in the communications and media industry. However, we strongly believe that compliance is not only, or perhaps best, achieved through increasing enforcement efforts. Rather than focusing on deterrence via enforcement measures, we recommend finding other avenues to encourage industry compliance, including (but not limited to):

- increased resources such as guidance, and education materials for both industry and end-user consumers;
- meaningful community and industry engagement to raise awareness and increase collaboration on effective and efficient mechanisms to combat issues; and
- lowering the burden of regulatory compliance for industry –
For example, our members often raise the complex and confusing regulatory landscape that exists for the telecommunications industry as a barrier that impedes their compliance efforts. We urge the ACMA to support the consolidation of regulators related to an industry to an overarching body.

With regards to compliance areas, we commend the work that ACMA has done thus far to combat SMS and phone scams. We support this continuing to be an area of focus for the 2023-24 financial year. As scams continue to be an issue for Australians, we strongly recommend that ACMA works

with industry to devise strategies to combat scams, in addition to working to increase compliance with existing mechanisms.

Once again, IAA appreciates the opportunity to contribute to the ACMA 2023-24 Compliance Priorities. While we continue to support the ACMA in ensuring the safety of consumers and the resilience of Australia's communications industry, we emphasise the importance of taking a holistic approach to ensuring compliance, and improving industry processes to achieve this outcome. We sincerely look forward to continue working with the ACMA, industry, government and other stakeholders for this purpose.

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