

30 September 2022

To the Department of Infrastructure,
Transport, Regional Development,
Communications and the Arts

RE: Exposure Draft—Telecommunications Legislation Amendment (Statutory Infrastructure Providers and Other Measures) Bill 2022

Thank you for the opportunity to express the Internet Association of Australia’s (IAA) perspective on the *Exposure Draft—Telecommunications Legislation Amendment (Statutory Infrastructure Providers and Other Measures) Bill 2022* (‘Bill’). As most of IAA’s members comprise of ISPs and RSPs, ensuring the effectiveness of the Statutory Infrastructure Provider (SIP) regime is of great importance, and IAA recognises the efforts to improve the operation of the regime through the proposed Bill.

Overall, IAA generally supports the changes being proposed by the Bill and objectives provided by the Department’s webpage on the consultation for the proposed Bill.¹ We welcome in principle, the initiatives and believe it will assist in providing our members as well as Australian customers with greater clarity and assurance regarding the services provided by SIPs and the standards they must comply with.

However, we note that due to the lack of further information provided regarding the Bill by way of an accompanying draft Explanatory Memorandum or other explanatory paper, it is difficult to comprehensively comment on the potential implications of the Bill. While we are inclined to support the changes being proposed, we believe that further explanation and justification should be provided, to ensure a more effective consultation process - both as a matter of principle and for practicality.

A thorough and genuinely collaborative consultation process is integral in maintaining industry and government trust, and also results in better informed and thus more effective regulation.

Once again, IAA appreciates the opportunity to comment on the *Exposure Draft—Telecommunications Legislation Amendment (Statutory Infrastructure Providers and Other Measures) Bill 2022*. We sincerely look forward to continue collaborating with government, industry and other stakeholders to ensure the effectiveness of the SIP regime through genuinely collaborative consultation processes in the future.

¹ <https://www.infrastructure.gov.au/have-your-say/exposure-draft-telecommunications-legislation-amendment-statutory-infrastructure-providers-and-other>