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ACMA Review
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Thank you for the opportunity to provide feedback into the root and branch review of the ACMA. The last ten years has been a time of change and evolution not only for the ACMA but also the the broader media industry. The manner in which the ACMA has managed to cover such a broad remit, running the gamut from traditional media businesses, to network infrastructure providers to emerging digital platforms and technologies is impressive given the challenges and opportunities that the still converging media industry is experiencing.

Digital is now completely integrated into daily business activities; whereas it was once viewed in isolation as a separate set of tools. For example, email started as a supplement to postal mail and the telephone, but today, it is the basis of communication – changing expectations of responsiveness for everyone from the consumer to the CEO. In 2013-14, the digitally enabled economy contributed \$79 billion (or 5%) to Australia's GDP, more than the Australian agriculture, transport and retail sectors combined¹. The digital economy is forecasted to be worth \$139 billion by 2020 (or 7.3% of GDP)² and Government's role in creating the right framework for this to occur, cannot be underestimated.

This data points to one conclusion: digital is a fundamental economic enabler. In the modern economy, where the Internet underpins much of the activity, there is no separate 'digital economy'. The Internet has changed how business is done: from simple productivity gains in supply management, finance, and communication, through to significant gains by expanding geographic markets and creating new channels to reach customers. The scale and pace of change driven by the Internet only continues to accelerate.³ The rise in Internet use has driven unforeseen technological innovations and has led to new generations of interconnected web services, applications, consumer devices and infrastructure. Complex, unnecessary regulation hinders business' ability to adapt to the fast-paced change happening throughout the economy.

Google's work with the Authority has largely centred around the specific initiatives for online consumers and citizen protection. We have had a longstanding relationship with the teams who carry out this work and we consider this a very collaborative, consultative and constructive relationship. Google has actively supported Safer Internet Day for many years and regularly promotes the Authority's excellent cyber-safety resources. Most recently we have been actively engaging with the new eSafety

¹ Deloitte Access Economics *The Connected Continent II* [report](#), March 2015

² *ibid*

³ BCG, 'The 4.2 Trillion Dollar Opportunity', 2012, <http://goo.gl/iSMoS>.

Commissioner, Alastair MacGibbon, and are very much looking forward to working with him on making the Internet a safer place for Australian children.

In our view, the Authority has conducted and published high quality reports on safety, security and privacy and we regularly refer to these reports in our work. We have shared these views with Paul Paterson (Chief Economist) in the context of the new Bureau of Communications Research and have urged him to utilise, promote and avoid duplicating the research being undertaken by the ACMA.

We look forward to the release of the update on optimal conditions for effective self and co-regulatory arrangements and appreciate the Authority identifying areas where non-regulatory approaches may provide a better 'fit for purpose' response to particular issues. We consider there to be a significant opportunity to more fully explore the range of self and co-regulatory models available in response to new and emerging business models and technologies. Private corporations are strongly incentivised to invest in trust and reputation building policies as their business models depend upon it. This should not be underestimated when considering the appetite and willingness of businesses to self-regulate.

In turning to the future and the opportunities for the Authority, we support the enduring concepts framework and attach copies of research that may be of interest. In the context of cultural values, Australian content creators are pushing creative boundaries and drawing huge online audiences in Australia and around the world. I'd like to draw your attention to YouTube's 'Skip Ahead' partnership with Screen Australia involving funding, resources and education to be distributed to Australian content creators and artists for the production of scripted content for distribution via YouTube and other online platforms. The winning projects from the first round of funding for this partnership were [Lend Us a Ride](#), [Axis All Areas](#), [Neighbours: Zombie Edition](#), [Manwhore Industries](#) and [Veritasium](#); and Screen Australia are currently taking applications for the second round of funding.

We welcome working with the ACMA and respect its focus balancing balanced, proportionate regulation in a converged media landscape by focussing on public interest outcomes (rather than inputs). However we stress the need for a flexible regulatory framework and the importance of any frameworks being grounded in evidence and the enduring merits of partnership which we believe has been evidenced and proven in the context of the Authority's work on cyber-safety in partnership with the technology industry and the not-for-profit sector who focus on child protection issues.

The need for partnership and collaboration is heightened given the dissolving geographic boundaries of digital experiences. We welcome efforts to consolidate expertise in consumer safety and security within the Authority and are confident that the Authority will continue to oversee and respond to this fast moving portfolio guided by solid research, continued engagement and a strong sense of resilience.