

The Director

DIRECTORATE FOR SCIENCE, TECHNOLOGY, AND INNOVATION

Mr Ray Abdul Rahim
The Australian Competition and Consumer
Commission (ACCC)

E-mail: E-mail: iarkr@acc.gov.au

STI/D/2018.053

Dear Mr. Abdul Rahim,

We write to comment on the consultation paper “Internet Activity – Proposed Record Keeping Rules” published on 9 August 2018. The document correctly notes that the OECD is a user of the Australian Bureau of Statistics (ABS) Internet Activity Survey (IAS). This survey has provided important information for all stakeholders in Australia and enables the OECD to use IAS data for international comparisons.

We also agree with the conclusion, in the consultation paper, that there are currently no suitable replacement sources of data when the ABS discontinues the IAS. As such we commend the Australian Competition and Consumer Commission’s (ACCC) proposal for a new Record Keeping Rule (RKR) to collect Internet activity data, to be called the Internet Activity RKR, given the importance of the data for its monitoring, analysis and reporting functions, and for other organisations including the OECD.

We have one general comment and two specific comments in relation to the proposed Internet Activity RKR. As a general comment, we find the proposal to be well set out and that the proposed Internet Activity RKR will be able to continue to provide valuable information for all stakeholders. In respect to the specific comments they are:

- On your request for a preference for a bi-annual or annual reporting cycle, we note that half-yearly reporting would match the OECD’s own twice-yearly data collection and release. A bi-annual survey would therefore be consistent with most other OECD countries.
- On the scope of the survey the most important area not covered – and one, which was also not included by the ABS IAS – is machine-to-machine data. Australia is one of only two countries in the OECD that does not collect the number of subscriptions for M2M services. This is a critical gap in the ability of all stakeholders in Australia to be able to better understand both the use of mobile services by people but also in respect to the Internet of Things (IoT). The ACCC should, therefore, consider asking mobile operators to reports separately subscriptions for M2M services.

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The breaking out of M2M data would enable the ACCC to better inform policy makers and its own responsibilities as well as all other stakeholders, in both the penetration of devices used by people in their daily lives and a critical technology for digital transformation. Indeed the leaders in this area, such as the Swedish Post and Telecommunication Authority, not only collect M2M data in relation to subscriptions but also average revenue per subscription and volume of data per subscription. In the future, without a break out of such data it will be challenging to inform all stakeholders in areas such as the use of communication networks and services in critical areas such as transport (e.g. fully automated vehicles are expected to make increased demands on broadband networks) or in areas critical to the Australian economy from agriculture to health and many more. Indeed, assessing the geographical availability of services and the capacity to meet demand, including in rural and remote areas, would be informed by such data.

Finally, the OECD through its Committee on Digital Economy Policy has been undertaking work on the future of IoT measurement and we look forward to forwarding a soon to be published report in the near future. My staff would also be pleased to discuss any aspect of the proposed Internet Activity RKR.

Yours sincerely

A handwritten signature in black ink that reads "Andrew Wyckoff". The signature is written in a cursive, slightly slanted style.

Andrew WYCKOFF