

18 December 2020

Digital Transformation Agency
PO Box 457
Canberra City
ACT 2601

Via website: www.digitalidentity.gov.au.

To whom it may concern:

Re: ABSIA's Response to Digital Identity Legislation

The Australian Business Software Industry Association (ABSIA) welcomes the opportunity to make this submission on behalf of our members and the software industry. ABSIA's membership includes many large and small DSPs, add-on developers, software companies, financial institutions, individuals and organisations that advocate for the interests of software developers across the region and promote and encourage the digitisation of the Australian economy.

ABSIA broadly supports the Digital ID system being made available to the private sector and its ability to offer efficient and cost effective digital identification verification and log in processes. In responding to the background paper and consultation paper, ABSIA has chosen to respond to the following two issues: charging framework and responsible body which we believe impact upon our members and the industry.

Charging Framework

The industry has concerns about the charging framework including how it will be developed and what the costs will be for all those involved. We understand that the current approach involves the costs being too high for some players to reasonably participate. The charging framework needs to be feasible for small players and volume users to leverage. Taking this into consideration, we recommend creating a tiered charging framework that takes into account usage to make these costs fair and more accessible to smaller developers. This would enable micro, small businesses and start ups to access these services at a lower fee structure when compared to larger businesses.

Responsible Body

ABSIA believes that a new independent body should be created as the Oversight Authority. Given that Digital Identity will be used across Australia, this body should comprise people from a variety of Government agencies to bring together the right expertise and experience to appropriately govern Digital Identity.

We would like to note the experience with the Consumer Data Right regulatory approach where the Treasury intends to take back the rule developing role from the ACCC. When creating the Oversight Authority, this kind of experience should be taken as a learning on how to ensure the right governance approach is taken.

ABSIA would appreciate the opportunity to engage further on these issues. For further information about this submission, please contact Maggie Leese, ABSIA Marketing and Membership.

Yours faithfully,

Chris Howard,
President & Director, ABSIA.