

1 April 2021

Data Economy Unit  
Market Conduct Division  
The Treasury  
Langton Crescent  
PARKES ACT 2600

Via email [regmod@treasury.gov.au](mailto:regmod@treasury.gov.au)

To whom it may concern

**Re: ABSIA's Submission to Modernising Business Registers (MBR) Program**

The Australian Business Software Industry Association (ABSIA) welcomes the opportunity to make this submission on behalf of our members and the software industry.

Overall, ABSIA supports the work of the Modernising Business Registers (MBR) program and the introduction of the director identification number (director ID). We look forward to working together on how business software can best support directors in the director ID application process.

While we are supportive of this work, we are concerned that the uptake for existing directors will be slow if there are no options for software to assist in pre-filling information on their behalf. We understand that directors will not be able to complete the application process through their software but there is this opportunity to support them and streamline this process by utilising APIs. Further, we also believe that agents should be able to at least initiate the application process on behalf of individuals to support greater adoption.

The information collected from directors for the register should include the ABNs or ACNs that a director is connected with to support future tranches of the MBR program.

We look forward to contributing to the next piece of consultation on the transitional application periods.

ABSIA would appreciate the opportunity to engage further on the points laid out in this submission. For more further information about this submission, please contact Maggie Leese.

Yours faithfully

**Simon Foster**  
**President**  
**Australian Business Software Industry Association Limited**