5 February 2020

Digital Transformation Agency
50 Marcus Clarke Street
Canberra ACT 2601

RE: Response to Public Consultation - 4th release of the TDIF

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

ABSIA supports many components of the Trusted Digital Identity Framework documentation and strongly advocates that a universal trusted digital identity is critical. The importance of a trusted digital identity capability is increasing with businesses becoming more and more interconnected. The recent introduction of APRA's CPS234 is recognition of this.

An opportunity has been missed however to support SMEs wishing to become accredited under the TDIF and to leverage a universal trusted digital identity capability. Costs are increasing which is adversely impacting SMEs who will not only have to pay for their accreditation but will then need to make their solution available at an affordable price point in a competitive market.

Given the complexity, time and cost involved in completing accreditation against the TDIF, it will potentially make the framework inaccessible to SMEs wishing to gain accreditation. To foster innovation and support SMEs in this industry, the Government should provide a more affordable pathway to accreditation for SMEs.

Aside from the need to support SMEs, we look forward to the final release of the TDIF documentation and its implementation in the digital identity space.

ABSIA would be more than happy to participate in further conversations. Should you require additional information or have any questions about this submission, please contact ABSIA Director Ian Gibson - ian.gibson@absia.asn.au.

Yours faithfully,

Simon Foster
**Vice President
ABSIA.**