



Australian Government



Australian
**Small Business and
Family Enterprise**
Ombudsman

25 January 2022

Data Economy Unit
Consumer Data Right Division
Treasury

via email: regmod@treasury.gov.au

Dear Sir/Madam

Modernising Registry Fees (December 2021)

We support the modernisation of fee structures for the Australian Business Registry Services (ABRS).

Search fees

We recommend the removal of retail search fees. Small businesses use retail searches to inform business decisions, such as checking for any previous phoenix activity associated with a prospective customer. Reducing the barriers to accessing this information will help small businesses protect their own economic interests. We appreciate concerns that the removal of search fees may make personal data more readily available. As such, consideration should be given to requiring registration and log in before conducting a retail search. Such steps would not appreciably increase the 'red tape' of searches if payment requirements are removed, and records would be kept of who has accessed personal data to assist with criminal prosecution or civil proceedings for data misuse.

Infrastructure fees

We support a transparent infrastructure fee structure that is easy for industry to understand and promotes data driven business models using ABRS's Application Program Interfaces to build products that will have economy-wide benefits. We support a subscription fee model as it will reduce entry barriers into industries using ABRS's data and ensure long-term parity in cost sharing.

Late fees

In line with our previous submission, we support the introduction of a simplified and far more proportionate late fee regime.

Lifecycle fees

We support the rationalisation of lifecycle fees into tiered cost levels, in line with the Australian Government's *Regulator Performance Guide*, which notes that "regulation is not a one-size-fits-all activity". Lowering costs for simpler registry activities will contribute to their timely execution.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Mr Eamon Sloane on 02 5114 6108 or at eamon.sloane@asbfeo.gov.au.

Yours sincerely

The Hon. Bruce Billson

Australian Small Business and Family Enterprise Ombudsman

T 1300 650 460 E info@asbfeo.gov.au
www.asbfeo.gov.au

Office of the Australian Small Business and Family Enterprise Ombudsman
GPO Box 1791, Canberra City ACT 2601