From: Matthew Addison <matthew@icb.org.au>
To: Registry Modernisation <regmod@TREASURY.GOV.AU>
Subject: Review of Registry Fees

Greetings
Reactions to Discussion Paper

The consultation and decisions should also be made in the context of a new modernised business world and eventual modernised business register. We are no longer in a world of costly processes to provide the steps in providing registry services or outcomes.

Types of fees – highlevel in principle response
Registration and renewal – agree
Review – it depends but not inclined to support a fee to meet a review compliance obligation – lets not create a disincentive to review or update essential data.
Late fees – yes
Search fees – depends (this topic requires consideration of what searches for what purposes)
Lifecycle fees - depends

Consultation questions:
1   Yes: We support further reduction or removal of digital search fees. Noting there should be consideration of reasonable use limits or similar to deter frivolous or improper use.
1.1 Yes we have concerns: Further detailed discussion should be conducted
2.   In principle we do not believe software utilising API to access registry services, searches etc should be charged any infrastructure fee. Possibly a "purpose" factor should be considered as allowing fee exemption or fee application.
       API that facilitate compliance should have no fee.
       API use that facilitates a commercial use of the data might have a fee.
3.   In principle we do not support a connection fee. A streamlined business and compliance environment which encourages uptodate information and ease of interaction should not be dissuaded by applying such a fee.
4. in principle we also do not support a usage fee for compliance based activity and interactions with the registry.
5. we support the concept of reasonably prescribed, explained and applied late fees. Such fees to create a disincentive to be late.
    Streamlining and simplifying of the late fees so that there is one fee per offence. Lodgment and payment are not necessarily separate actions as such
6. Design of late fee regime – this is an action by action discussion
7. lifecycle fees – in a modernised, digital world there should be no fees attached to many "functions". Change of name is costly anyway – they impact to the registrar is miniscule and if conducted digitally there should be no fee.
Voluntary deregistation / reinstatment – the fee is a discincentive to do things properly – these functions should not have a fee attached.

What is the "purpose" of the fee? What is the function being considered?   Why does the function exist and what purpose does the function provide? We should establish a set of principles for which activities in a future world should have fees attached.   It should not be based on history.

8. tiered fees – in concept this sounds logical

Other

Remove the CPI/annual/etc increase to fees – which creates stupid fee levels ie $83 and $1281 etc. Set a round fee amount and review every 5 years with a perspective of the purpose of the fee and not on the basis of inflation.

Thanks
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