

From: Leanne O'Donnell
Sent: Wednesday, 4 March 2020 10:54 AM
To: Payment Times
Cc: Simon Lewin
Subject: Response to Payment Times Framework Consultation

Good morning,

Vocus has reviewed the Payment Times Framework consultation paper and the draft Bill. We do not have any substantive comments to make on this proposed new reporting regime. We have two minor observations as set out below.

We note that the draft content rules in the consultation paper states that entities will be required to report:

*The total proportion (number and value) of invoices paid within the **contract terms**.*

However, section 13 of [the draft bill](#) that deals with reporting requirements, does not refer to contract terms. The section more generally states:

The report must:

- (a) specify the reporting period to which the report relates;
- (b) include information *prescribed by the rules relating to the **entity's payment terms** and practices during the reporting period in relation to its small business suppliers;* (my emphasis)

For clarity, we suggest that the draft rules should align with the language in the draft Bill and also state "entity's payment terms" rather than "contract terms". This minor change would allow entities to report on suppliers who have been set up based on agreements rather than pursuant to specific contracts.

The consultation paper and the draft bill do not make any reference to payment by direct debit. We assume that payment by direct debit is out of scope given reporting entities do not control this payment.

Kind regards,

Leanne O'Donnell | GM - Regulatory Affairs

M: +61 404 080 964 **D:** +61 3 9132 8455 | **E:** Leanne.ODonnell@vocus.com.au

P: 1300 88 99 88 or +61 2 8999 8999 **W:** vocus.com.au

A: Level 10, 452 Flinders Street, Melbourne, VIC 3000, Australia | Follow us: [in](#) [t](#)

