



28 January 2022

Data Economy Unit  
Consumer Data Right Division  
The Treasury  
Langton Crescent  
PARKES ACT 2600

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Equifax welcomes the opportunity to comment on the discussion paper Modernising Registry Fees, Exploring opportunities to improve fee structures for the Australian Business Registry Services, December 2021.

Set out below are our responses to questions 1 to 4.

#### Search fees

Questions	Equifax Response
1. Are you supportive of a further reduction or removal of digital retail search fees?	<p>Equifax does not support the removal of digital retail search fees. Equifax supports a fee structure that enables the ABRS to self-fund the register's operation, ongoing maintenance and future investment and therefore avoiding the constraints of Federal Government budgetary pressures.</p> <p>The fee structure should not only support the sustainability of the register, but also the scalability and adaptability of the register to meet emerging market needs and embrace improved technologies. The trustworthiness and reliability of the register is of paramount importance and as such, search fees should be structured to ensure the ABRS is able to meet the needs and demands of the public and industries that rely upon it, for the benefit of the Australian economy.</p> <p>We have observed in markets where business data does not generate revenue flows, such as New Zealand and the United Kingdom, that investment in the register stagnates, and the registers do not meet their full potential.</p>
1.1. Do you have any concerns about retaining fees on a limited range of searches?	<p>Equifax has no concerns with retaining fees on all or a limited range of searches. Our principal concern is that the ABRS is able to secure the requisite funding for ongoing investment in the register.</p>

#### Infrastructure fees

2. Which types of users (or use-cases) should be	Equifax is of the view that all users and all use cases should be charged an infrastructure fee. Similar to our view on search fees, infrastructure
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<p>charged an infrastructure fee? Are there any users (or use-cases) that should be exempt?</p>	<p>fees should directly contribute to the ABRS carrying out appropriate due diligence on prospective users, and ongoing reviews or audits of those users. The ABRS will be fundamental to the Australian economy and fundamental to the market infrastructure, and these checks and reviews will be essential in building and maintaining trust in, and reliance on, the register.</p> <p>At the very least, the ABRS must ensure that users are vetted for their cyber resilience, data security, and privacy compliance. ABRS should satisfy itself that users have the necessary commercial investment, and infrastructure, checks and balances, to access and safeguard the ongoing provision of these critical data assets.</p> <p>Ongoing reviews or audits of users should also be carried out, to not only ensure compliance with any regulatory requirements but for the users ongoing ability to maintain effective cyber resilience, and data security.</p>
<p>3. If a connection fee is to be introduced, which is preferable: a larger one-off onboarding fee, or a smaller ongoing subscription fee?</p>	<p>Equifax is of the view that a larger one off onboarding fee together with smaller ongoing subscription fees may be necessary to enable the ABRS to secure sufficient funding for it to properly carry out appropriate due diligence and reviews as suggested above in our response to question 2.</p>
<p>4. If a usage charge is to be introduced how should it be set (e.g. per company, attribute, unit of measurement (e.g. by API call))?</p>	<p>Equifax is of the view that usage fees should be maintained to retail and wholesale customers. As an information broker we appreciate the value currently placed in the data by Australian businesses and financial institutions.</p> <p>While not averse to progressive consumption models, further consideration should be given of impact to ABRS and wholesale customers. The primary concern being maintaining the integrity and value of ABRS products.</p>

We look forward to working with you and your team on this project and are happy to make ourselves available for further discussions.



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