

15 August 2011

Mr Patrick Emery
Manager
Technical Regulation Development Section
Australian Communications and Media Authority
PO Box 13112 Law Courts
Melbourne Victoria 8010

By email: single.mark@acma.gov.au

Dear Mr Emery

Consolidated compliance mark – proposed implementation arrangements

The Australian Subscription Television and Radio Association (ASTRA) welcomes the opportunity to comment on the Australian Communication and Media Authority's proposed implementation arrangements for the consolidated compliance mark (RCM).

ASTRA is broadly supportive of the implementation arrangements proposed in the ACMA discussion paper, and agrees with the ACMA that:

- the existence of multiple mandatory regulatory marks is inconsistent with the evolution in the communications and IT technical and commercial environment;
- the use of multiple marks has the effect of increasing unnecessary regulatory and compliance costs for industry; and
- the implementation of a consolidated compliance mark will lessen some industry administrative burdens by reducing the complexity of the compliance marking arrangements and consequently the time required by industry to comprehend and abide by those arrangements.

ASTRA believes the proposed three-year transition period would appear to be sufficient lead-in time for equipment manufacturers and suppliers to incorporate the new arrangements. ASTRA also supports existing devices being retained on the market with current labels for the life of the device.

ASTRA notes the involvement of its members in the supply of consumer equipment for the delivery of subscription television services, and welcomes future opportunities for active involvement with the ACMA in relation to consumer electronic equipment technical and policy issues.

Yours sincerely



Petra Buchanan
CEO