

## Comments on the Proposed Restricted Access Systems Declaration

The proposed restrictions on MA15+ content in the RAS Declaration is unenforceable in practical terms and stands to undermine the integrity of the Classification system overseen by OFLC.

At present there is not a system to electronically verify the age of a 15 year old who would not have a credit card or driver's license. 15 year olds are, however, allowed to access MA15+ material. Since the Declaration requires an age verification and one does not exist, it would seem the next step might be to ban all MA15+ content from mobile and online delivery. If such a ban were imposed it would conflict with the goal of bringing all classification into one system because instead we would see one classification category (MA15+) disappear from the online and mobile sectors. Moreover, such a ban would severely restrict online and mobile business opportunities relative to migration of content from one medium to online and mobile platforms.

In an alternative scenario, if a verification system were to be developed, there is nothing to prevent one young person (a 17 year old) from sharing MA15+ content with his/her 13 year old friends, especially via mobile phone. The mobile phone is personal technology, it is easily hand passed from one to another, making regulation of this sort ineffective.

In sum, the proposal will either not meet the regulatory aim of restricting content access or it will do so at a considerable cost to business and to the integrity of the classification system itself.

The erosion of the Classification system's integrity is a critical concern.

Having a Classification system that cannot be enforced in all circumstances put that system in a poor light, it makes the system look inadequate. It is unwise to implement a system that is inadequate from its inception.

Government regulation of content in the online and mobile sectors is an impossible dream and an expensive one. As a tax payer, in addition to a scholar of children's media practices, I see this proposal as wasteful and misguided.

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