

From: [Cathy Rainsford](#)
To: [Matthew Anderson](#); [Juliet Stuart-Smith](#)
Subject: FW: Jose suggestion [SEC=OFFICIAL]
Date: Thursday, 19 January 2023 11:27:51 AM
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.jpg](#)
[image005.jpg](#)
[image006.gif](#)

For your consideration.

Regards

Cath

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From: Chris Jose <Chris.Jose@acma.gov.au>
Sent: Thursday, 19 January 2023 11:23 AM
To: Cathy Rainsford <Cathy.Rainsford@acma.gov.au>
Subject: Jose suggestion [SEC=OFFICIAL]

Cathy

This picks up what I understood came from today while dealing with my other concerns about the current drafting

(2) CT and EMRS must each give written attestations (the **attestations**) to the ACMA setting out:

(a) what, if any, changes have been made since the authorisation was granted to the practices, procedures, processes and systems (processes) CT and EMRS had in place (or intended to put in place) to comply with the conditions of the authorisation as disclosed to the ACMA in support of the authorisation as set out in CT and/or EMRS's application(s) to the ACMA dated 18 April 2019; and (the processes) since that date, and when any such changes occurred.

(b) how these processes will ensure that CT and EMRS will ~~a description of how any changes to the processes identified in response to Additional Condition 2(a)~~

(i) comply with all conditions of the authorisation.

This picks up the 3 dot points at the end of my email yesterday, namely:

- We should check whether the processes we had regard to when granting authorisation were set out in the application of April 2019. I have a recollection that we had to go back to them and ask for more information so that we could determine if they would comply with the conditions.
- I don't understand why we have **and/or** with reference to the application(s). We should know who made the application and how many there were – that is an objective fact.
- I think the proposed numbering is unduly cumbersome. I suggest clause 2(a) and (b) be clause 2 and clause 3 thus removing the need for 2(a)(i) and 2(a)(ii) numbering level.

Happy to discuss

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