

## AUSTRALIAN TELECOMMUNICATIONS ALLIANCE SUBMISSION

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To: Australian Communications and Media Authority (ACMA)  
Re: Proposed Annual Carrier Licence Charge (ACLC) 2024–25


11 September 2025



## 1. AUSTRALIAN TELECOMMUNICATIONS ALLIANCE

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The Australian Telecommunications Alliance (ATA) is the peak body of the Australian telecommunications industry. We are the trusted voice at the intersection of industry, government, regulators, and consumers. Through collaboration and leadership, we shape initiatives that grow the Australian telecommunications industry, enhance connectivity for all Australians, and foster the highest standards of business behaviour. For more details, visit [www.austelco.org.au](http://www.austelco.org.au).



## 2. INTRODUCTION AND EXECUTIVE SUMMARY

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- 2.1 The ATA appreciates the opportunity to make a submission in response to the ACMA's consultation on the Annual Carrier Licence Charge (**ACLC**), and for the opportunity to review and comment on the Cost Recovery Implementation Statement (**CRIS**).
- 2.2 We do not have specific comments on individual items in the CRIS. Rather, we raise some overarching concerns about the ever-increasing cost burden industry faces relating to the regulatory functions administered by the ACMA.
- 2.3 In line with the ACMA's commitments to support the Government's regulatory reform agenda to improve productivity, investment and growth<sup>1</sup>, we urge the ACMA to find ways to reduce these costs – so industry may instead invest this money in ways that more directly benefit Australia's economy and the users of Australian telecommunications services.
- 2.4 On a separate but related issue, the ATA welcome's the ACMA's recent approach<sup>2</sup> to it to seek feedback on opportunities where the ACMA could take steps to reduce the regulatory burden on industry, as part of the Government's Productivity and Growth agenda. We will respond separately with specific proposals.

## 3. ATA RESPONSE

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- 3.1 The ATA notes that the proposed ACLC represents an increase of 6.7% year-on-year, following a 6.4% increase in the previous year.
- 3.2 We contend that increases of greater than 6% at a time when the Government is eager to support productivity gains, and when consumers are struggling with cost-of-living pressures, are challenging for both regulators and the industry, as, to the extent that regulator costs incurred in the ongoing administration of regulation are increasing, so too are industry's costs of complying with the regulation.
- 3.3 These costs are ultimately borne by consumers, either as direct cost increases, or in a reduction in investment in networks, products and/or services.

<sup>1</sup> [ITRDCSA - ACMA - Response letter - Nerida OLoughlin Redacted 0.pdf](#)

<sup>2</sup> Letter, ACMA to ATA, on the **Government's Productivity and Growth Agenda**. 2 Sept 2025.

- 3.4 The ATA notes the role regulation and consumer safeguard standards play in increasing costs.
- 3.5 As we noted in our submission<sup>3</sup> to the Economic Reform Roundtable<sup>4</sup>, telecommunications network operators and resellers in Australia are encumbered by an excessively complex regulatory landscape, comprising more than 500 legislative and regulatory instruments, of which around 200 are sector specific. In 2024/25 alone, approximately 20 additional sector-specific obligations were introduced or are in development.
- 3.6 The overall impact of these regulatory changes has been to require service providers to devote more staff and resources to compliance and monitoring.
- 3.7 In a market environment where margins are already constrained (many carriers do not generate returns above their cost of capital), service providers are increasingly required to commit ever increasing resources to compliance. This comes at the expense of investing in new and innovative products and services for customers.
- 3.8 The ATA notes that a key element of the Government's Productivity and Growth Agenda is to assess regulatory obligations on the industry, and where appropriate and possible, reduce or at least refine regulation to reduce the burden on industry.
- 3.9 It is disappointing, therefore, to see the cost of administering the sector's regulatory obligations continuing to grow year-on-year, with no evidence of any commitment to cutting costs in order to reduce the burden on industry.
- 3.10 Rather, the CRIS provides specific detail of how ACLC funding was spent across various parts of government last financial year, with costs justified on changes in the level of activity and workload since the previous fiscal year. There are no specified efficiency targets. Activities are simply taken as a fait accompli, that have to be resourced at an appropriate level to ensure workload is met.
- 3.11 The ATA asks the ACMA take the opportunity afforded by the Government's productivity agenda to look for opportunities to reduce the current regulatory cost burden of the ACLC, and report its progress in next year's CRIS.
- 3.12 By adopting a mindset that seeks to reduce regulatory burden at the outset (rather than a mindset of simply resourcing it), the ACMA can help the industry to meet the aspirations of the Government's productivity agenda.
- 3.13 Evidence that this mindset has been adopted would be apparent in next year's CRIS (for example) through statements showing the amount of regulation that has been removed or reduced, and the cost savings attributable to those reductions.

<sup>3</sup> Available from the Productivity Commission's website at: <https://engage.pc.gov.au/document/280>

<sup>4</sup> P4, [250725\\_ATA-submission-Economic-Reform-Roundtable\\_SUBMITTED.pdf](#)

