Communications Alliance response to Questions on Notice from the PJCLE Hearing on 17 Nov 2021 in relation to the PJCLE Statutory Review of the Criminal Code Amendment (Sharing of Abhorrent Violent Material) Act 2019

CHAIR:

Would your members have any objection to a public register being available so that people could see who was getting an AVM notice and how they responded to it?

Communications Alliance response:

Our members do not object to a public register of organisations that received an AVM notice and which organisations complied with the notice.

However, we do not believe that it would be useful to include the time how long it took the organisation to comply with the notice as the time to comply with the notice depends on a multitude of factors e.g.

- size of the organisation and number of subsidiaries
- type of network and configuration
- in the case of ISPs, whether a website block is also implemented for resellers
- amount of content available on the service
- type of content to be removed
- location of personnel
- time of notification (ordinary business hours vs. public holiday etc.)