

**Response to the Digital Platforms Preliminary Report**  
**by**  
**Intran Australia Pty Ltd**

**Regulation**

The ACCC has recommended primarily a regulatory course. Intran has no comment to make on the recommendations because Intran's venture is focussed on competition, not regulation.

It is noted that some commentators have expressed reservations on whether the recommendations will, or can be implemented.

**Opportunities**

The DPI Preliminary Report is largely silent on realising opportunities for Australia in the digital platforms space from non-regulatory action.

In response to the ACCC DPI Preliminary Report, the 10 December media release by the Treasurer and two other Ministers included the following text (Intran's emphasis):

***"To make the most of opportunities that digital platforms bring, ... "***

Intran's reaction: Although made aware of it, in its Preliminary Report the ACCC has not documented a significant opportunity for Australia that Intran's venture can bring. Rather, it makes recommendations to curtail the foreign platforms by regulation. So, the ACCC has embraced a negative approach to tackling issues. The ***National Internet Platform*** venture is a positive approach.

***"All interested stakeholders are encouraged to engage closely with the ACCC to ensure the report is informed by all perspectives."***

Intran's reaction: Intran made a DPI submission and Brian Savvas travelled to Sydney to meet the DPI team. Subsequently there was an exchange of emails in which Intran requested that the ACCC advise the Government of Intran's venture to see established an Australian competitor to the foreign platforms. The ACCC Preliminary Report makes no mention of Intran's venture.

As a consequence, Intran is approaching government by another path.

**Some Intran comments**

Page	ACCC text	Intran's comment
1	Such engagement may result in considerable change from the ACCC's current views, as expressed in this report.	By June Intran may be in a position of making its business model public.
2	... the sustainability of the commercial news sector in Australia ...	See dot point 4 above.
2	... the impact of digital platforms on advertisers ...	Most advertisers will prefer the Intran model to that of Google, Facebook and programmatic.
4	... this power is unlikely to erode in the short to medium term ...	<b><u>Strongly</u></b> disagree. This is a view from within the box. Intran's lateral thinking has created a contrary view.
9	The ACCC has also identified a number of other proposals for further analysis and	Including Intran's?

	assessment.	
9	... this constraint is likely to be weak due to the size of the barriers to entry ...	<b>Strongly</b> disagree. This is a view from within the box. Intran's lateral thinking has created a contrary view.
9	The aim of the preliminary recommendations below is to remove some of the potential impediments to the growth and independence of potential competitors that may challenge that market power ...	Welcomed, but unnecessary for Intran's venture.
14	Supporting choice and quality of news and journalism	See dot point 4 above.
15	The ACCC considers that a more transparent approach may be preferable.	The Intran model contains transparency.
15	Improving the ability of news media businesses to fund the production of news and journalism	The Intran model has this ability.
16	A digital platforms ombudsman	Unnecessary for the Intran model.
17	Opt-in targeted advertising	Accommodated in the Intran model.
20	The ACCC's consultation process revealed a number of other issues that have not been included in this preliminary report as they were not directly relevant to the scope of the Inquiry.	Refer to the Intran DPI submission, particularly the opening statement on the inadequacy of the Terms of Reference.