

On behalf of CEDIA, the association of the professionally installed smart home, thank you for allowing us the opportunity to provide written comments on the ACCC Digital Platform Services Inquiry Issues Paper.

CEDIA represents residential integrators who specialise in providing entertainment, networking, control, automation, lighting, and audio visual systems throughout the home. CEDIA member companies have bona fide qualifications and years of experience in this specialised, ever-changing, and technology-driven field.

Currently, smart devices are 'convenience devices' that require a trade-off between security, privacy, and convenience. However, we would like to highlight that professional devices installed by qualified integrators incorporate similar features and provide better privacy and security measures.

CEDIA would like to highlight the following information and perspectives to strengthen the ACCC Issues Paper:

1. Moving forward, we would like to see a clarifying statement on the difference between direct-to-consumer IoT devices and professionally integrated solutions, which may include technology featuring some IoT devices, included in the document. As the distinction is not made clear in the paper, it would be helpful to include a comparison to understand the potential implications for consumers.
2. We also wish to highlight that Matter, a new smart home connectivity standard supported by leading technology companies, including Amazon, Apple, and Google, was not mentioned in the policy. We believe that professional integrators using Matter may potentially solve many of the underlying issues raised in the ACCC's paper, and it would be valuable to consider this standard in any future analysis.
3. We strongly support the proposal to 'opt out' of data collection. However, we would like to request a stronger definition for the term 'data'. While it is essential to collect some data to refine or evolve technology, it is crucial to ensure that the data collected is not overly sensitive or harmful to consumer privacy. For example, we acknowledge that turning on a light creates a 'data' point that can be useful to improve the product and user experience, but recording sensitive data like conversations in private homes and tracking users' whereabouts raises significant privacy concerns.
4. We would like to bring attention to the importance of identifying 'perceived competition' as opposed to real competition.
5. We also appreciate the mention of artificial intelligence (AI). However, we would like to emphasise that AI marks a massive shift in smart technologies and how they will evolve and weave into the social fabric. As such, it would be helpful to have a more detailed discussion on the potential impact of AI in digital platform ecosystems.

On behalf of CEDIA, thank you for the opportunity to help strengthen the ACCC Digital Platform Services Inquiry Issues Paper. CEDIA looks forward to working with the ACCC, staff, and other

industry stakeholders and be part of the future discussions on this important issue for our members and the industry.

Sincerely,

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