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From: [REDACTED]@accan.org.au>  
Sent: Friday, 30 August 2024 3:38 PM  
To: IARKR  
Cc: [REDACTED]  
Subject: ACCAN Submission to the Internet Activity Record Keeping and Reporting Rules

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Dear ACCC staff,

Thank you for the opportunity to comment in the revisions to the Internet Activity Record Keeping and Reporting Rules (RKR).

ACCAN strongly supports the addition of Starlink into the RKR. As a LEOSats are rapidly developing technology, it is important for the ACCC to produce reliable information on these services to inform policymakers and the community at large.

As Starlink provides both wholesale and retail services, ACCAN also supports the ACCC's incorporation of non-NBN wholesale services in operation into the RKR. Doing so will ensure that the ACCC has greater oversight over the more than 200,000 services in operation that Starlink now provides in Australia.

As LEOSats become an increasingly prevalent aspect of the Australian communications market, we encourage the ACCC to continue to evolve its Record Keeping and Reporting Rules to ensure that government policy and regulations continue to be well-informed and up-to-date.

Please do not hesitate to contact me if you require any further detail from ACCAN on this subject.

Kind regards,

[REDACTED]  
Policy Manager

[Australian Communications Consumer Action Network \(ACCAN\)](#)

PO Box A1158 Sydney South, NSW 1235

[REDACTED][@accan.org.au](mailto:[REDACTED]@accan.org.au)

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Our team acknowledges that our office is on the land of the Gadigal people of the Eora Nation but ACCAN staff, board and members work on the traditional lands of many First Nations. We wish to pay respect to all their Elders — past, present and future.

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