

Craig,

Thank you for providing the opportunity to comment on the IPND Code (C555:2017) and Data Guideline (G619:2017).

We would like to provide the following suggested amendments that we believe will improve understanding and implementation of the IPND process.

Ref	Comments
2.3	<p>Is there a particular reason for changing the reference to a 'person' to exclude employees, subcontractors, and officers? We are uncomfortable with this, as these are common actors for companies that are not necessarily 'agents'. We believe this clause should be amended again to read:</p> <p>(h) a reference to a person includes a reference to the person's executors, administrators, successors, officers, employees, subcontractors, agents, assignees and novatees.</p>
4.2.8	<p>To provide a clear understanding of what is required from a DP.</p> <p>In the event that a technical failure of any kind prevents a Data Provider from transferring PNCD to the IPND Manager for more than one Business Day, the Data Provider must take all reasonable steps to provide data to the IPND Manager as soon as practicable and in the correct sequence and format after the technical failure has been rectified.</p>
4.2.9	<p>In the event that a technical failure of any kind prevents a Data Provider from transferring PNCD to the IPND Manager for more than one Business Day, the IPND Manager must take all reasonable steps (wherewith a focus on it ensuriges ensures the protection and privacy of IPND data) to accommodate the Data Provider's alternate methods of transferring PNCD until the technical problem is rectified.</p>
2.2/ 4.2.5/ 4.2.18	<p>We think we need to have either a definition of or more explanation of when a Data Provider Code is assigned – the code talks about the Data Provider Code but does not actually define it.</p> <p>Data Provider Code</p> <p>The IPND Manager will generate and allocate a unique Data Provider Code on receipt of an application from a Data Provider.</p>
7.1.13	<p>The IPND Manager must provide all Data Users and Data Providers with written notification of changes to the IPND</p>

	<p>interface specifications and IPND Data Users and Data Providers Technical Requirements having a material impact on them on an equitable basis for at least six months in advance of such change to the extent that such notification is possible.</p>
9	<p>Need to include</p> <p>IPND Data Users and Data Providers Technical Requirements for IPND</p> <p>as a reference source.</p> <p>It can be found on the following web site:-</p> <p>https://www.telstra.com.au/consumer-advice/ipnd</p>

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