

VRT Systems is primarily a systems integration business that has provided services to Defence, education, government, commerce, industry, resources and more recently residential, in the areas of 'Energy Management' for more than 30 years. As a relatively recent entrant into the area of utility billing, we have introduced considerable innovations, e.g. to the Barangaroo Redevelopment project. Our recent work in IoT infrastructure development, e.g. secure wireless mesh networking, also has applicability in areas of embedded networking and multi-utility billing. These "industry outsider" comments act as a preface to our suggestions below.

VRT is in agreement with the principles of the draft report and after attending the workshop on the 26th July 2019, would like to offer the following suggestions:

1. There is significant benefit to start the regulatory sandbox toolkit as soon as practical. VRT acknowledges that there are time constraints based on the need to pass regulatory changes to enable the full proposed sandbox toolkit, but there appears to be minimal obstacles in deploying the inquiry service (Innovation Hub) immediately. As discussed throughout the report and in the workshop, the inquiry service is expected to be the most highly utilised part of the regulatory sandbox toolkit, with most inquiries expected to be resolved at this point.
2. Consideration should be made to the first proponent of a trial rule change. The first proponent would have likely invested significant capital (and risk) and should be able to seek some benefit over their competition. To allow for this, should a successful trial be completed and this leads to a proposed rule change, the original proponent should be able to continue or even expand their trial while the rule change process takes place. Only after the final rule change is completed, should their competitors be able to implement a similar solution.
3. Common and/or significant inquiries should be collated and provided as FAQ's or Fact Sheets on the Innovation Hub. This would help to reduce repetitive inquiries and also allow for faster solutions to minor questions.

VRT appreciates to opportunity to provide feedback on the regulatory sandbox.

Signed:



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