



15 January 2016

Enabling Digital by Default

Australian Taxation Office (ATO)

Via email: DigitalbyDefault@ato.gov.au

ATO REQUEST FOR FEEDBACK: DIGITAL BY DEFAULT CONSULTATION

Dear Sir or Madam,

I am writing to you on behalf of the members and associates of Gas Energy Australia concerning your invitation for feedback on the Digital by Default initiative.

Gas Energy Australia supports greater digital interaction with the ATO including electronic lodgement of fuel excise returns (ie moving away from faxing and the element of uncertainty in this medium) and application for and management of vehicle licences and permissions (currently this is paper based and entails some manual processing).

Full portal functionality for all excise matters and customs licence matters (returns, amendments (to licences, PSPs, CPs and returns) new applications) would simplify our processes and lead to lower administrative costs. The ability to verify the excise licence/CP/PSP details of a counter-party in the portal would also be helpful (eg, the Australian Business Register permits public verification of ABNs and GST registration status and history, so such a move is not unprecedented). We appreciate this may be a cost to the ATO to implement but believe that both the ATO and taxpayers will share the efficiencies in the long run.

Gas Energy Australia also offers responses to specific questions in the consultation paper.

1. What do you think of the concept of ATO services being Digital by default?

The ATO and its business customers all use systems to conduct their activities so a digital interface is a logical step to provide more efficient self-service interaction for transactional activities. This creates the potential to direct resources to higher value activities.

2. Do you agree that a greater use of digital services will benefit all those who deal with us?

Responding for our members and associates who are business customer, yes. Allowances need to be made for consumer customers who are not comfortable with the use of digital technology and/or do not have readily available access.

3. Are there other benefits we have not outlined that you see from us using digital services to interact with you?

No additions.

4. What do you think is the best way to transition those who deal with us to digital services?

- Develop services in consultation with users.
- Launch with pilot users.

- Allow a transitional period.
- Provide user and technical support.
- Work with software providers to ensure Standard Business Reporting (SBR) capability is readily available (more so for small business).

5. Do you currently interact with us over digital channels?

Yes, through the online business portal to lodge weekly excise, BAS and FBT returns.

6. Are there circumstances where you would not go digital?

Non-standard interactions e.g. advice.

7. Would you incur any cost to go digital? If yes provide approximate cost (\$) and a brief description.

Immaterial for our members and associates.

8. What support would best help you to go digital?

- Timely issuing of AUSkeys and support for access issues
- Software compatibility issues addressed e.g. Edge

9. How confident are you that our support services currently available could help you go digital?

No view.

10. As a member of the tax professional community, a software developer, intermediary, government agency or community group, how do you think we can work together to support the community to transition to digital services?

Not applicable.

11. Do you think the consideration of penalties is appropriate where taxpayers do not lodge on time or through the required channel?

Perhaps, reflective of the incremental costs to the ATO for resolving the non-conformance.

12. Do you think the approach to exemptions is balanced?

No further comment.

13. What factors do you think should be considered when providing an exemption?

No further comment.

14. Are there other ways we can assist those who are unable to move to digital services?

No further comment.

In conclusion, Gas Energy Australia welcomes the ATO making greater use of digital technology in delivering its services. This will lower administrative costs for businesses and taxpayers in meeting their obligations to the ATO and using its services. Gas Energy Australia would also welcome the opportunity to provide additional feedback and assistance as the ATO implements the Digital by Default initiative.

For your consideration.

Yours sincerely

A handwritten signature in black ink, appearing to read "John Griffiths", with a long horizontal flourish extending to the right.

John Griffiths
Chief Executive Officer