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Cc: Brittney Haryanto <[Brittney.Haryanto@asic.gov.au](mailto:Brittney.Haryanto@asic.gov.au)>  
Date: 21/11/2017 07:07 PM  
Subject: RE: Invitation to provide feedback: ASIC's 2016-17 performance against the Regulator Performance Framework - by Friday 17 November 2017

Hi Andrew

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I note the deadline for comment has passed, however I have reviewed the attachments sent regarding ASIC performance against the KPIs and just have a few brief comments.

- I note the 'admission' or acknowledgement in paragraph 80 about the service standards falling short in processing AFSL applications, especially leading up to June 2016. We commented on this in our June submission, so we are pleased to see these comments. From the perspective of our members it was not just the time periods but also the inconsistent and on occasion unhelpful treatment of the applications.
- Our members often comment that ASIC guidance is 'legalistic'. 'Plain English' can be more user friendly.
- On occasion ASIC staff are non-committal when answering queries. While this is understandable, it is often helpful if more specific guidance can be provided. The ATO approach works well.
- We note the assessment in paragraph 101 regarding consultation periods. We urge ASIC (and all govt agencies) to try as much as possible to adhere to these standards. Eight weeks is an admirable aim.
- Otherwise we refer to the comments in our June submission.

Regards

Vicki

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