



TELSTRA CORPORATION LIMITED

Submission in response to the Payment Times Reporting Bill

10 July 2020



Introduction

Telstra recently announced new arrangements under which suppliers with invoices of up to \$2 million annually will receive twenty-day payment terms. Under these new arrangements, the vast majority of our suppliers will have their invoices paid within twenty days of Telstra receiving a validly submitted invoice.

Telstra's comments on the Payment Times Reporting Bill 2020 (the Bill) specifically relate to the definition of a Payment Period.

We have also provided a submission to the Department of Industry, Science, Energy and Resources' consultation on the draft Payment Times Reporting Rules. We otherwise have no specific concerns.

The definition of a Payment Period should be consistent

Section 14(1)(d) of the Bill is inconsistent with Section 9 of the draft Payment Times Reporting Rules regarding the definition of the commencement of a payment Period. Clarification of what is meant by the "issue" of an invoice versus the "receipt" is needed to remove ambiguity. Telstra recommends the Bill be amended to specifically reference the receipt of an invoice as the definition of the commencement of a payment Period.

Availability of the Payment Time Small Business Identification Tool

In order to expedite the system development required to enable Telstra to extract information and produce the reporting, the Tool should be made available as soon as practicable. Any delay in the availability and accessibility of the Tool would hamper our ability to automate identification of our small business suppliers in accordance with the definition in the Bill.