consultation on draft Digital ID Bill and Digital ID Rules

Thank you for the opportunity to comment on this draft bill. My comments will be brief.

The one question you should have asked and did not is: "Is the 'smart phone' the correct platform for a digital ID?"

My answer is a resounding and emphatic **NO**. The unreliable state and security of the technology makes it UNSUITABLE at this time to be the sole repository of a person's bonafide ID. Why do I have this strong opinion? Some reasons are:

* easy target for theft

* easy to lose

* if government data can be hacked (e.g., NSW driver's licences), a phone could be hacked a lot easier than that, placing all your identification confirmations in the hands of intended impostors - and even if they can't hack it, while your phone is 'gone', you have no proof of who you are and have to go through the whole complicated process all over again.

* smart phones break down too often and can be out of commission for weeks at a time while being repaired, leaving the holder with no proof of ID because everything is on the phone (a typical example: I know someone who spent over \$1K for their smart phone which has broken down twice this year leaving him with nothing while being repaired and, when it does work, it screeches during calls.)

* power outages can also affect mobile phone towers so users in an area that is down will not be able to prove their ID either. Power outages have not been front and center in Australia so far (unless you live in SA) but they will be part of our future as we enter solar maximum (due in 2025 but is arriving earlier). Forcing renewables onto the population is also going to cause outages, especially during summer months when air conditioning will be heavily used. No power - no ID.

* 4G frequencies and higher have never been properly safety tested (apparently ARPANSA/ACMA are dependent on data more than 25 years old) so bringing in an ID system which requires the use of a device that has been proven to cause cancer is not intelligent (unless you actually want to boost cancer rates). The damage this technology does to the environment is another issue and is one of the main reasons why I will not use such a device.

* Not everybody uses a 'smart phone'. Some of us feel the technology has gone too far and is being used as a 'crutch' which will make people lazier and less productive. This draft legislation keeps using the word "voluntary" but once enacted, how quickly will it turn to "mandatory"? I have no confidence the government will keep it voluntary and that lack of confidence has been reinforced over and over again by government behaviour in recent years.

* WHERE will all this critical data be stored and how will it be restricted to recipient? The draft documents talk about the user being able to decide who gets to see their data but what about the sum total of that data and how can you prevent it from being hacked?

The government's enthusiasm at adopting computer technology to do everything for us except wash the dishes in the sink is misguided and pre-emptive. Computers now - as well as the amount of AI phone direction systems - are proving that they are NOT as capable as a human brain when it comes to flexibility. I've personally witnessed failure of AI phone systems and online chat facilities used by government agencies, 'big box' stores and telcos (just off the top of my head).

As a person who has been using computers for over 40 years, I've seen countless examples of: software bugs and glitches;

failures of programs because the operating system was updated without the user's permission; printer failures and entire machines needing to be thrown out because ONE little part is no longer stocked;

harddrive failures;

corroded ports and usb males rendering an entire device they are connected to unusable, software corruption and virus infestations;

incompatibilities of programs from one system to another;

shorter and shorter lifespans of computers, laptops, tablets (and smart phones) which all get thrown out to rot in landfill for another 100 years;

and of course outages lots of lots of outages of the internet, landline phones (which drop out repeatedly now); nbn (which also doesn't work when the power is out - at least adsl still worked).

When these devices work, they can do some great things - but the amount of time they waste, especially when trying to get them sorted during malfunctions, is not worth the mining resources that are stolen to build them and the ever growing piles of toxic waste building up in landfills. If they are not 100%, then they are not reliable enough to depend upon for critical information.

The standard (or lack thereof) of the computer industry and internet in Australia does not warrant putting full dependence on digital systems for anything important. They are simply not reliable enough yet and they are too easy to hack, causing no end of grief for all those whose personal data has been stolen.

NO DIGITAL ID AT THIS TIME is my final comment.

Thank you for reading.