

## **HBO Max Submission on Stakeholder Engagement Paper – Cost Recovery Implementation Statement (CRIS) for Classification Services**

1. This document lays out HBO Max’s comments in response to the Department’s stakeholder engagement paper on Cost Recovery Implementation Statement (CRIS) for Classification Services.

### **About HBO Max**

2. HBO Max is the premier streaming platform from Warner Bros. Discovery that delivers the most unique and captivating stories, ranging from the highest quality in scripted programming, movies, documentaries, true crime and adult animation. HBO Max (formerly Max) launched in Australia on 31 March 2025. HBO Max is the destination for prestigious entertainment brands such as HBO, Warner Bros., Max Originals, DC, Harry Potter, iconic shows like “Friends” and “The Big Bang Theory,” as well as local productions such as “Outback Opal Hunters” and “Aussie Gold Hunters”, all in one place.

3. HBO Max currently utilises the self-classification option. As a new service recently launched in Australia, HBO Max has benefited immensely from the Classification Office’s training programs for accredited classifiers, as well as the Classification Office’s generous assistance and advice.

### **Our comments**

4. We recognise the need for the Department to consider cost recovery arrangements for classification services. We are of the view that any cost recovery arrangement should be designed in a manner that is fair, transparent and reasonable.

5. We offer the following in response to questions for stakeholder feedback:

*Q1: Do you have any views on the current fee structure? For example, should different fees apply to different types or sizes of industry participants or different products that are being classified?*

- We recognise the value to industry and cost to the Classification Office in relation to services rendered towards industry support, training and advice, and monitoring and quality assurance activities. These services, as noted on pg. 12, are currently not charged for.
- In this respect, we are supportive of the proposal to charge a reasonable sum for such services. As a self-classifier, we have benefited from these services.

*Q2: In what way might potential revised or newly introduced fees impact on your business or choice of classification method?*

- Any proposed revision of existing fees or introduction of new fees would constitute an additional cost to business.
- However, we do not anticipate a change to our current classification method.

*Q3: While understanding broader government policy concerning cost recovery, what factors should be taken into consideration for future cost recovery arrangements for classification services?*

- Future cost recovery approaches should consider the one-off, expected uptick of frequency/volume of service use for streaming services which are newly launched in the market.

- For new services launching, we recommend that the Department considers BAU volumes (i.e., scheduled hours of viewing) rather than imposing fees based on start-up or launch volumes, as this could have the effect of penalising new services by determining a potential fee on the basis of the initial launch volume, rather than the ongoing submission of classified material.

*Q4: What transitional arrangements would support industry adaption to a revised cost recovery model?*

*Q5: Is there any further feedback that you would like to submit in relation to classification fees or cost recovery arrangements as part of this Engagement process?*

- With respect to proposed fees for industry support, training and advice, and monitoring and quality assurance activities, we recommend that improvements be made to (i) the search function of the National Classification Database; and (ii) the software used for uploading classification decisions on its Portal which is currently time-consuming and burdensome.
- We additionally suggest that the Classification Office encourage industry to complete their training and adopt self-classification. Whilst we welcome the various approaches for classification, we observe that there is a reduced need for ongoing monitoring and review by the Classification Office/Board for services which rely on well-trained self-classification, as well as the lower revocation rates when adopting the self-classification approach. As such, we are supportive of a reasonable fee to be charged by the Classification Office in providing training services. This fee, however, should not be at a level that would discourage industry from availing itself of the self-classification option.

## **Conclusion**

6. We appreciate the opportunity to provide comments. We are happy to respond to any questions arising from our submission and participate in follow-up discussions. Please do not hesitate to contact:

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Content Compliance Manager  
Warner Bros. Discovery  
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