Digital Directors Australia New Zealand

Submission to the Office of the Australian Information Commissioner

Automated Decision-Making Transparency Obligation (APP 1) — Issues Paper, 18 May 2026

To	Office of the Australian Information Commissioner
By email	privacyreformtranche1@oaic.gov.au
Closing date	Monday 15 June 2026
Submitter	Digital Directors Australia New Zealand (DDANZ)
Author	[redacted] National AI Governance Lead, DDANZ (UTS affiliation noted)
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About this submission

Digital Directors Australia New Zealand (DDANZ) is a non-commercial national peer network for company directors on digital governance matters. DDANZ is not a vendor, does not sell compliance products or services, and takes no commercial position in this consultation. Its interest is confined to the quality of board oversight of the automated systems for which directors are accountable.

Publication and confidentiality

DDANZ consents to this submission being published in full on the OAIC's website. The submission contains no personal information requiring redaction. The author's name and role are provided as professional attribution, not as personal information, and DDANZ requests that the author's name and role not be redacted on publication.

Transparency declaration

The author holds commercial interests in AI governance advisory work. This submission is made solely in the author's DDANZ capacity and reflects DDANZ's non-commercial, board-governance perspective. It does not advance any commercial interest and takes no position that depends on commercial benefit. Every argument below is framed from the standpoint of director accountability and board oversight. In keeping with the transparency this submission advocates, the author notes that AI tools were used to assist in its drafting (Grammarly and Claude Opus 4.8). All content, including every legal citation and position taken, has been independently verified and approved by the author.

University note

The author is a PhD researcher at the University of Technology Sydney (UTS). This submission is made in the author's DDANZ capacity and does not represent the views of UTS.

A note on the question numbering used

This submission is structured according to the numbering in the OAIC Issues Paper Submission form (Questions 1–10), which APP entities complete. Where useful, it cross-references the corresponding question numbers in the Issues Paper (Questions 1–12), the relevant paragraphs of the Explanatory Memorandum (EM), and the subclauses of APP 1.7–1.9.

Executive summary

Digital Directors Australia New Zealand is concerned with how boards discharge their duties under the new ADM obligation, and that perspective informs this submission. Most entities will treat this obligation as discharged the moment their privacy policy is updated. For a board, that is where accountability begins, not where it ends. The information an entity discloses about its automated decision-making is not a formality to be drafted once and filed. It is the visible layer of an accountability chain that runs up to the board and, increasingly, to the individual director. Most boards cannot read that chain today because most boards lack technology expertise. This new legislation imposes accountability on directors for disclosures that are, by their nature, technical; a director can no longer plead ignorance of the automated systems their organisation deploys. The obligation entails the expectation that directors hold a foundational understanding of those systems, sufficient to discharge their governance and oversight duties in accordance with the law. DDANZ's position is therefore direct. Over time, an automated system tends to become the de facto decision-maker even with a human in the loop: operators have limited capacity to oversee repetitive work, and where a system reliably produces trustworthy results, attention fades, and the human comes to endorse rather than examine the output, including at the rare exceptions where intervention matters most. DDANZ therefore favours interpretations of scope that err on the side of the more expansive. The obligation should be read broadly enough to give boards genuine visibility of the ADM they are accountable for and drawn clearly enough at the edges that a director can verify where their organisation stands without an engineer to translate.

DDANZ's view rests on five headline recommendations:

1. **Substance over form.** Guidance should state that a nominal human sign-off does not take a system outside APP 1.7(a) where the machine output is the operative basis of the decision (EM [337]).
2. **A "meaningful override" test.** Whether the human reviewer has the information, time, and capability to depart from the system's output is the practical factor that separates oversight from rubber-stamping, and it is the one a board can interrogate.
3. **"Arranged for" reaches procured tooling.** An entity that arranges for a third-party tool to make or assist decisions, but cannot evidence what decisions it makes, has not discharged the obligation. Ignorance is a compliance gap, not an excuse (EM [335]).
4. **Guard the commercial-in-confidence exclusion.** It protects the technical specifics of a system, not the existence, kind, personal information used, or effect of the decisions it makes; otherwise, it hollows out disclosure.
5. **Anchor to the board accountability environment.** Directors' duties under the Corporations Act 2001 (Cth) mean that disclosures should be structured for directors discharging oversight duties, not only for privacy officers.

DDANZ also recommends that the guidance include a risk-tiered, illustrative taxonomy of decision types, so that boards and entities can self-locate and calibrate the depth of disclosure to the decision's impact.

Question-by-question responses

Question 1 — Factors for "substantially and directly related to making a decision"

Form Q1 = Issues Paper Q1. Relevant: APP 1.7(a); EM [336]–[337].

The EM gives the test its content: a thing is substantially related where it is "a key factor in facilitating the human's decision making" and directly related where it has "a direct connection with making the decision" (EM [337](a)–(b)). The word "substantial", read across cognate frameworks, means real or of substance — not insubstantial or nominal (Tillmanns Butcheries Pty Ltd v Australasian Meat Employees Union [1979] FCA 85, as adopted in the OAIC's FOI guidance and cited in the Issues Paper). The bar is therefore real, but not high.

For a board, the decisive question behind every factor is the same: whether the system, in practice, determines the outcome. DDANZ ranks the factors to make that answerable by a director, not only an engineer: the issue behind each is whether the human in the loop exercises judgment or merely endorses the machine.

Factor	Rank (1–5)
Nature of the output (advisory vs determinative)	**5**
Degree of reliance on the ADM system output	**5**
Whether the human reviewer has the information, time and capability to meaningfully override the output (added factor: the "meaningful override" / anti-rubber-stamp factor)	**5**
Ability and likelihood of human override over an ADM decision	**4**
Transparency and explainability of outputs	**4**
Whether the system's output is an input to another system, and its effect on the final decision rather than only the step it performs (added factor: the "chained-systems" / downstream-impact factor)	**4**
Integration of ADM into the decision-making workflow	**3**

The added factors are the most important contribution DDANZ can make here. An override right that exists on paper is worth nothing if the reviewer cannot see why the system reached its output, has no time to test it, or lacks the authority or capability to depart from it. That is the difference between a control and a formality. Equally, a system that appears minor at a single step can be decisive once its output feeds into a downstream system, so the assessment must follow the output through to the decision it ultimately shapes, rather than stopping at the step in front of it. Guidance should name both the practical capacity to override and a system's downstream impact as factors, not merely the theoretical existence of a human step.

Framing the test so that a director can verify it. DDANZ recommends that the guidance express the factors as questions a director can put to management and expect a straight answer to: for a given

decision type, what does the system output; how often is that output followed; and can our people actually depart from it, with the information and authority to do so? Where the honest answer is that the output is almost always followed and staff are not equipped to challenge it, the system is substantially and directly related to the decision, regardless of the final human click, and the obligation is engaged.

Question 2 — Edge case: generative AI with human oversight (NACIA / GPTea)

Form Q2 = Issues Paper Q2–3. Relevant: APP 1.7(a), 1.8(c), 1.9(d)(iii); EM [337], [343].

Yes/No: Yes.

Reasons. GPTea does two things: it summarises candidate profiles, and it recommends eligibility outcomes for life-changing aged-care support. Both are caught. A summary frames what the human decision-maker sees and therefore shapes the decision. This is not the neutral equivalent of a human reading the full profile: a summary necessarily selects and excludes, and for a candidate near the boundary of eligibility, a small omission can change the outcome, so the act of summarising is itself substantially related to the decision. A recommendation goes further still and is, on its face, "a key factor in facilitating the human's decision making" (EM [337](a)) with "a direct connection with making the decision" (EM [337](b)). Eligibility for aged-care support is plainly a decision affecting access to a significant service or support (APP 1.9(d)(iii); cf. the healthcare example at EM [343](c)). The obligation is engaged, and NACIA's privacy policy must disclose the kind of decision and that a computer program does a thing that is substantially and directly related to making it (APP 1.8(c)).

Nominal sign-off does not take a system outside the obligation. The case is framed around the comfort that "human staff always make the final decision". That framing is precisely the risk the obligation should reach. The test is one of substance over form. What matters is not whether a human clicks "approve" but whether the recommendation is the operative basis of the outcome, assessed by the actual reliance on the output, the human's real ability and likelihood to override it, and whether the output is explainable enough to be challenged. Where a recommendation is the operative basis of the decision, it is "substantially and directly related" within EM [337] regardless of a final human click.

Board framing. A human in the loop is not the same as a human in control. A board cannot evidence genuine oversight by pointing to a person who rubber-stamps a machine's output; the process is not proof of judgment. If the guidance allowed a nominal human step to switch off the obligation, it would reward the exact arrangement that leaves directors blind: high-volume, lightly endorsed automated recommendations with no disclosed footprint. DDANZ recommends that the guidance state expressly that the presence of a human decision-maker does not, of itself, take a system outside APP 1.7(a), and direct entities to the meaningful-override factors in Question 1.

Question 3 — Factors increasing the likelihood that a decision affects rights or interests

Form Q3 = Issues Paper Q4. Relevant: APP 1.7(b), 1.9(c)–(d); EM [340], [343]. DDANZ responds briefly.

DDANZ agrees with the listed factors and offers the following emphasis, viewed through the lens of board oversight.

Factor	Rank (1–5)
Sensitive information	**4**
Financial outcomes	**5**
Vulnerable persons	**4**
Intrusive practices	**3**
Scale / volume of automated application (added factor)	**4**

Three short points. First, the added factor: a decision applied automatically to a large population warrants the board's attention, even where the impact on any single individual is moderate, because the aggregate effect and the consequences of a systematic error are significant. Second, the factors that raise the likelihood of a significant effect are the same factors that should trigger board-level visibility; the guidance can usefully make that link so that the disclosure and oversight obligations reinforce one another. Third, sensitive information is ranked below financial outcomes because it increases the likelihood only where the data actually bears on the affected individual: health data used to forecast a hospital's supply needs, for instance, does not, by itself, elevate the significance of a decision about that person.

Question 4 — Classes of persons considered vulnerable

Form Q4 = Issues Paper Q5.

DDANZ does not offer a view on the classification of vulnerable persons. That question falls outside DDANZ's board-governance remit and is better addressed by submitters with direct expertise in, and standing to speak for, the affected communities.

One observation only. Where a decision is reasonably expected to affect different groups differently, that differential vulnerability impact should be a documented, board-level oversight matter rather than an operational footnote.

Question 5 — What constitutes a significant service or support

Form Q5 = Issues Paper Q6.

DDANZ does not offer a view on the catalogue of significant services or supports. That question falls outside DDANZ's board-governance remit and is better addressed by submitters with direct sectoral and consumer expertise.

Question 6 — Other legal frameworks relevant to "rights" and "interest"

Form Q6 = Issues Paper Q7. Relevant: APP 1.7(b); Corporations Act 2001 (Cth).

The Issues Paper already canvasses the EU and UK GDPR, the EU AI Act, administrative law and the ART Act. DDANZ does not repeat that ground. DDANZ raises one framework that, in its view, no other submitter is likely to press and which is directly relevant to why ADM transparency matters: directors' duties under the Corporations Act 2001 (Cth).

The connection is already half-drawn by the OAIC. In interpreting the meaning of "decision", the Issues Paper turns to Corporations law, noting that it adopts the ART Act definition and that a business judgement is "any decision to take or not take action in respect of a matter relevant to the business operations of the corporation" (Issues Paper, Meaning of 'decision' across other legal frameworks). DDANZ submits that the connection runs both ways. Just as Corporations law informs the meaning of "decision", directors' duties inform why the rights and interests captured by APP 1.7(b) deserve a reading that supports oversight.

A director's duty of care and diligence (Corporations Act 2001 (Cth), s 180(1)) extends to the oversight of material risks faced by the company. The risks an automated system creates to the individuals it affects, and in turn to the company itself, are now among those risks. The business judgment rule (s 180(2)) protects an informed decision. It cannot protect a board that never informed itself of what its automated systems do. An automated system that the board cannot describe is one that the board cannot govern.

The obligation does not only draw on directors' duties; it adds to them. Governance of automated decision-making is governance of a function that is technical at its core, and a director cannot oversee what they do not understand. The obligation, therefore, conveys on directors an expectation that did not press on them before: that they hold a sufficient working understanding of the technologies and functions underpinning the organisation's ADM to govern them, to challenge management's account of them, and to discharge their oversight duties in line with the law.

The practical implication. Disclosures should be structured so they are usable not only by privacy officers but by directors discharging oversight duties. Transparency that satisfies a privacy policy yet tells a director nothing about the automated systems the board is accountable for is a missed opportunity. Construed with board accountability in view, the better reading is one under which disclosures identify the kinds of decisions an organisation automates and the personal information it uses: the facts a director needs to oversee the system and an affected individual needs to contest it.

Question 7 — Edge case: differential pricing (Daintree / Marco)

Form Q7 = Issues Paper Q8–9. Relevant: APP 1.7(b), 1.9(c); EM [340], [343].

Is Marco significantly affected? In principle, yes — but DDANZ declines to nominate a bright-line percentage.

Why decline a fixed threshold? The EM and the Issues Paper already recognise differential pricing as potentially significant, including where it results in differential pricing for access to goods or services (EM [343]) and where targeting bears on people likely to be in financial difficulty (EM [340]). A fixed percentage threshold is the wrong instrument for three reasons. First, it invites gaming: a system can be priced just under the line. Second, it treats a contextual question as arithmetic. Third, and most importantly, the same percentage bites harder on a low-income or vulnerable individual than on a wealthy one, the very point the EU Guidance makes when it observes that prohibitively high prices can effectively bar someone from goods or services. A single number cannot carry that weight.

Recommended test. DDANZ recommends a contextual materiality test: does the differential bar or materially impede the individual's access to the good or service, given that individual's circumstances? On

the facts of the edge case, Marco, a freelance artist priced out of a book by a wealth-postcode inflation, is significantly affected in principle. Two things are doing separate work here. The automated, data-driven nature of the pricing is what brings the decision within the provisions at all: a manually set higher price would deny access in the same way, but is not what APP 1.7(b) reaches. Given that the pricing is automated, the contextual materiality test then asks whether the differential bars or materially impedes his access, which, in his circumstances, it does.

Importance ranking (Issues Paper Q9, answered on the form's 1–5 scale):

Factor	Rank (1–5)
The significance of the product or service being purchased	**5**
The dollar amount of the differential pricing	**3**

The significance of the product or service is the more telling factor: the more essential the good or service, the more readily a differential significantly affects interests. The dollar amount is relevant, but not determinative. A large differential on a trivial purchase may matter less than a moderate one that bars access to something a person needs.

Note for the OAIC (confirmed discrepancy between the two consultation documents): the importance-ranking question is posed on a 1–6 scale in the Issues Paper but on a 1–5 scale in the submission form. DDANZ has answered on the form's 1–5 scale and flagged the inconsistency for the OAIC's attention.

Question 8 — Edge case: discriminatory targeted job ad (Manscon / Rafqa)

Form Q8 = Issues Paper Q10. Relevant: APP 1.7(a), 1.9(a)–(b), (d); EM [343]. DDANZ responds briefly.

Yes/No: Yes — it should be considered a "decision".

Reasons. The definition of "decision" that the Issues Paper itself adopts, from s 9 of the ART Act, is deliberately wide. APP 1.9(a)–(b) bring "refusing or failing to make a decision" and "refusing or failing to do a thing" within scope. Opaque Window's algorithmic non-promotion of the role to Rafqa is a thing substantially and directly related to who is considered for the position, and the non-receipt limits her access to employment opportunities, an outcome the EM treats as significant (EM [343]). The narrower judicial-review gloss requiring a final or operative decision (Australian Broadcasting Tribunal v Bond [1990] HCA 33) does not constrain the Privacy Act, which adopts the wider approach. Critically, by choosing to advertise its roles on the platform and accepting its targeting parameters, Manscon has "arranged for" the system under APP 1.7(a); accountability for algorithmic exclusion cannot be passed off to the third-party platform. This is not a neutral pipe: an algorithm embeds the choices of those who build it, and the targeting parameters that excluded Rafqa are themselves design decisions for which accountability sits with those who deploy them. DDANZ is content to take this position on the record.

Question 9 — Scenarios where "arranged for" requires guidance

Form Q9 = Issues Paper Q11. Relevant: APP 1.7(a); EM [335].

The EM is clear that "arranged for" assigns responsibility to the entity that arranged the program to make or assist in a decision, which may not be the entity that operates it (EM [335]). The Issues Paper's own examples, including procuring an AI system to screen and rank job applications; directing employees to use an AI tool to draft performance assessments that determine promotions; contracting a third party to approve or decline refunds; and a case-management system that auto-escalates complaints, all point in one direction: arranging includes procuring and deploying third-party tooling. DDANZ identifies three scenarios where guidance would materially help boards.

1. Procured tooling that the entity cannot see inside. Guidance should make clear that the obligation is not discharged by ignorance. An entity that has arranged for a third-party tool to make or assist in decisions must still be able to state, in its privacy policy, the types of decisions made and the types of personal information used (APP 1.8). If it cannot, it has not met the obligation. This is the single most useful clarification the guidance can offer, because it turns the privacy policy into a forcing function: to disclose, the entity must first find out.

2. The boundary between "arranged for" and "merely operating". The operator examples in the Issues Paper (developing and hosting software the developer does not itself use; maintaining fraud-detection infrastructure) sit on the other side of the line. Guidance should clarify that a single entity can both operate a system for itself and arrange for others, and that "arranging" turns on responsibility for deploying a program to a decision, not on who wrote the code.

3. Layered supply chains. Where a procured tool embeds further third-party ADM (a sub-processed model or an external scoring service), guidance should confirm that the arranging entity's disclosure obligation is not defeated by the length of the chain. The entity that deploys the tool in its decisions remains responsible for describing those decisions.

Illustrative board scenario (hypothetical). A board procures a third-party HR-screening tool to shortlist job applicants. The vendor treats its scoring logic as proprietary. The board cannot provide evidence of the decisions the tool makes, the personal information it uses, or how its shortlisting affects applicants. Under APP 1.7(a), the entity has "arranged for" the tool; the inability to describe what the tool decides is not an excuse; it is a compliance gap. It is also a governance inversion: by procuring the tool, the board has handed the fiduciary risk it bears to a vendor's engineering team that owes the affected individual nothing. The right response is to negotiate the visibility the entity needs to disclose before the tool is deployed, not after a complaint forces the question. Framing guidance this way protects individuals while equipping directors.

Question 10 — Extent of disclosure, and commercial-in-confidence guardrails

Form Q10 = Issues Paper Q12. Relevant: APP 1.3, 1.7–1.8; Addendum to the EM, para 38 (commercial-in-confidence).

DDANZ supports the OAIC's five balance criteria: plain language; structured to enable requests for further information; appropriately tailored; logically grouped; and framed to allow the information and the decision to be challenged or contested. DDANZ adds four points.

1. Make disclosures usable by directors, not only by consumers and privacy officers. A privacy policy is the public artefact and should remain a plain-language summary. But the ADM inventory that the public disclosure draws from is also the natural basis for board oversight. DDANZ recommends that the guidance encourage entities to maintain an internal ADM register from which the public disclosure is drawn, so the board can see the whole while the public sees a meaningful summary. This avoids a situation evidenced even within government: the OAIC's own review of automated decision-making transparency, published in January 2026, found that of 23 Commonwealth agencies authorised to use ADM, only four (17%) disclosed that use in their Information Publication Scheme information, and none had published any policy or guidelines on ADM, leaving neither the public nor the board able to readily establish what automated decisions an organisation makes.

2. Adopt a risk-tiered, illustrative taxonomy of decision types. DDANZ recommends the guidance include a tiered, illustrative taxonomy so boards and entities can self-locate and calibrate disclosure depth to impact. For example:

- **Tier 1 (high / determinative impact):** automated credit declines, automated recruitment screening, automated service triaging, and determinative automated decisions affecting legal rights, benefits or access.
- **Tier 2 (advisory / gateway impact):** generative summaries used for assessments, automated risk scoring guiding human auditors; advisory or recommendation systems that are substantially relied upon (the NACIA / GPTea pattern).
- **Tier 3 (administrative / low impact):** simple calculations or administrative transformations, such as a routine threshold or formatting step that does not, on its own, shape a decision about an individual.

Impact is the primary axis, but the degree of automation is a second consideration that can elevate a system's tier: a fully automated decision with no human in the loop may warrant heightened visibility even at modest individual impact, precisely because the automation removes the human observation that would otherwise surface problems.

This mirrors the proportionate-disclosure approach in the UK ICO guidance cited in the Issues Paper, under which higher-impact, sensitive-data decisions warrant proportionally more expansive disclosure. A taxonomy gives a board a map: where do our systems sit on this, and have we disclosed accordingly? It also prevents management from presenting overly dense, technical architectural maps to the board in place of a standardised, board-readable risk register.

3. Guard the commercial-in-confidence exclusion so it does not hollow out disclosure. The Addendum to the EM (para 38) confirms that commercial-in-confidence information about ADM systems is excluded from APP 1.7. DDANZ supports a genuine but narrow exclusion, grounded in a strict structural separation between the how (protected) and the whether/what-kind (always disclosable):

	Inside scope of disclosure (the public floor)	Protected by commercial-in-confidence
System existence	Whether an ADM system is used for a specified decision type	The exact source code or software compilation
Data inputs	What kinds of personal information are processed by the tool	The specific proprietary feature-engineering or weighting applied to those inputs
Decision scope	What kinds of decisions are made or guided by the program	The specific decision-making parameters, calculations or model logic

The three items in the left column are exactly what APP 1.8 requires, and they are not commercial-in-confidence merely because a vendor asserts that they are. Accordingly: the onus should rest on the party asserting commercial-in-confidence, and the assertion should be specific, not blanket; the exclusion cannot be used to avoid disclosing that ADM is used at all or the type of decision involved; and where a procured tool's vendor asserts commercial-in-confidence over everything, the arranging entity remains obliged to disclose the APP 1.8 information and should secure the necessary visibility at procurement.

Internal board visibility. Commercial-in-confidence exclusions apply to public disclosures. They must never justify management limiting the board's internal visibility. Directors require operational access sufficient to understand the automated systems for which they are legally accountable; public transparency should be supported by rigorous internal reporting, not used as a ceiling on that reporting.

4. Allow reuse of documentation prepared under adjacent frameworks to avoid duplication. Where an entity already documents its ADM under the Voluntary AI Safety Standard, ISO/IEC 42001, the NIST AI Risk Management Framework, or (for agencies) the DTA's AI transparency-statement standard, the guidance should allow that documentation to be reused to satisfy APP 1.8, rather than requiring a parallel artefact, provided the public-facing disclosure remains plain-language and meaningful. This reduces the compliance burden without weakening transparency and encourages entities to treat ADM transparency as part of an existing governance system rather than a stand-alone form-filling exercise.

Consolidated recommendations

DDANZ's recommendations across the questions above are consolidated below.

1. **Substance over form.** Guidance should state that a nominal human sign-off does not take a system outside APP 1.7(a) where the machine output is the operative basis of the decision (EM [337]).
2. **A "meaningful override" factor.** Add, as a named factor, whether the human reviewer has the information, time and capability to depart from the system's output, the practical test that distinguishes oversight from rubber-stamping.
3. **Director-verifiable factors.** Express the Question 1 factors as questions a director can put to management: what the system outputs, how often it is followed, and whether staff can genuinely depart from it.
4. **NACIA / GPTea is in scope.** Confirm that summarisation-plus-recommendation, which frames a decision, is substantially and directly related to making it, regardless of a final human click.
5. **No bright line for differential pricing.** Decline a fixed percentage; adopt a contextual materiality test: does the differential bar or materially impede access, given the person's circumstances? Marco is significantly affected in principle.
6. **"Arranged for" reaches procured tooling.** Confirm that an entity that cannot evidence what decisions a procured tool makes has a compliance gap, not an excuse (EM [335]).
7. **Narrow the commercial-in-confidence exclusion.** Limit it to genuine technical specifics; the existence of an ADM system, the kind of decision, the personal information used, and the effect of decisions fall outside the exclusion; place the onus on the party asserting it.
8. **Risk-tiered, illustrative taxonomy.** Include a tiered taxonomy of decision types so boards and entities can self-locate and calibrate disclosure depth to impact.
9. **Anchor to directors' duties.** Have regard to the Corporations Act 2001 (Cth), including s 180, and the board-accountability environment; structure disclosures to be usable as an instrument of board oversight.
10. **Permit re-use of adjacent documentation.** Allow documentation already prepared under the Voluntary AI Safety Standard, ISO/IEC 42001, the NIST AI RMF or the DTA standard to satisfy APP 1.8, avoiding duplicative documentation.
11. **Non-receipt of an opportunity is a "decision".** Confirm that failing to do a thing, such as not serving Rafqa the job ad, is within APP 1.9(a)–(b).
12. **Note for the OAIC.** The importance-ranking scale differs between the Issues Paper (1–6) and the submission form (1–5); DDANZ answered on the form's scale.

End of submission.