Invoiced, Not Supplied

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Version 1.0, September 2026. This assessment reads the Commonwealth's contract notice register, AusTender, for what it makes visible about who supplies the Commonwealth and what it does not. It reads the register's own account of its supplier field, in the Open Contracting Data Standard the feed declares, the Department of Finance's data dictionary for the contract notice dataset, Finance's Resource Management Guide 423 and the Commonwealth Procurement Rules; it then reads twelve months of the register through an instrument this practice built and publishes in full, and reports what the instrument found and what it cannot see. Every claim rests on an artefact pinned by hash in this case's register or on an artefact already pinned in this corpus, and every figure is recomputed from the frozen instrument.

What the register shows, before any method. A contract notice names the entity the agency contracted with and invoiced. It carries no field for whose product, service or infrastructure was procured. The register's own guidance says that where a supplier subcontracts part of a contract, the arrangement "is not considered a third party procurement" and "Subcontracting arrangements are not reportable on AusTender." A vendor whose product reaches an agency through a reseller, a licensing solution provider or a marketplace therefore appears in the supplier field only when it is the party invoicing, and a count of notices by supplier reaches a vendor's own contracts and no others. That is what the register records, from the register's own documents, and everything that follows is evidence for it, not the source of it.

Scope

The subject. The AusTender contract notice record, read for what it makes visible and does not make visible about who supplies the Commonwealth. Not what a buyer can know about its own supply chain, which is a different subject with a different population and no public record to read.

The population. P1: 55,592 contract notices first published between 16 September 2025 and 16 September 2026, retrieved from the AusTender OCDS API on 16 September 2026 in 53 weekly windows, 703 requests, every one answered 200 [`GF-PULL-2`, sha256 `92adc72c429a1925…`]; 62,232 releases, of which 6,640 are amendments across 5,452 notices; one row per notice at its latest release, so that each carries its cumulative value and current period. The 703 response bodies are held outside this repository and pinned by their hash list [`GF-PULL-1`, sha256 `26bd3fbaa812b183…`]. P2: 9,461 of those notices, filtered to ICT-shaped procurement by five UNSPSC prefixes and thirteen title regexes, published in full as `filter-terms.json` (sha256 `5b251ebcc8cdbcb3…`); 1,422 of them are in on a title term alone. **The claim is about the register, so P1 is the population; P2 is where the measurement was taken, and every figure below says which**

of the two it is over.

The bound, stated before the first figure. Of the 9,461 notices in P2, 8,827 name no brand on this practice's list in their description, $7,834,458,684 of $9,653,995,302. Every figure in Section 4 is taken over the 634 that do. The figures are a floor of what the register shows, and the register is a floor of what was bought; Section 5 states this at full width.

What is assessed. Forty-five register rows. Twenty-five artefacts were retrieved on 16 September 2026 under convention 50 and pinned by hash: the feed's extension descriptor, release schema and package schema [`D-OCDS-1`, `D-OCDS-2`, `D-OCDS-2b`]; the API specification and its README [`D-OCDS-3`, `D-OCDS-3b`]; the Open Contracting Data Standard 1.1.5 release schema and party-role codelist the feed declares [`D-OCDS-4`, `D-OCDS-5`]; one contract notice page as served [`D-AT-1`]; Finance's Resource Management Guide 423 at its landing page and three sub-pages [`D-FIN-1` to `D-FIN-4`]; Finance's contract notice data dictionary [`D-FIN-DD`]; and twelve pages retrieved as search steps and pinned as such [`F-FIN-1`, `F-FIN-2`, `F-FIN-S1`, `F-HELP-1` to `F-HELP-5`, `F-AT-POL`, `F-AT-DOC`, `F-DGA-S1`, `F-DGA-2`]. Sixteen rows are inherited under convention 7: fourteen from the general finding that made the pull [`GF-PULL-1` to `GF-MANIFEST-1`] and two from the Commonwealth Procurement Rules retrieval [`L-CPR-5`, `L-CPR-8`]. Four rows hold this practice's own published assessments by hash [`P-BCM-1`, `P-CPI-1`, `P-TSC-1`, `P-AWS-1`]. **25 + 16 + 4 = 45.**

The instrument. Three files, published in full with this assessment: `brand-list.json` (sha256 `cb032e89903b0c3b75e8a51c4157f25eea95728ec0d7910375212a73590924b6`), `shape-terms.json` (sha256 `d301fdc417d023e7…`) and `filter-terms.json`. They were frozen on 16 September 2026 as version 1.0, as the sweep of that day left them and after that sweep had produced the finding, and before any sentence of this assessment was written; from the freeze on, the order is the commit history. How the terms were built before the freeze is on no record, because the sweep ran outside version control; what is known of it is the author's account, and this practice's open-items register at item 175 states what that account holds and that nothing on disk can check it. Section 3 describes them before Section 4 gives any figure they produced. Every figure is recomputed from them by `measure.py` over the pinned releases.

How the negatives are stated. Every negative below states the population it was established over in the sentence that makes it. Every count names its test. Every quotation is a whitespace-folded substring of the pinned blob it cites, and the thirty quotations this document makes, twenty-one from the register's documents and nine from this practice's published assessment, the notice page and the feed's own field values, are listed with their blobs and hashes in `QUOTATIONS-2026-09-16.tsv` (sha256 `852585eddda73c2d…`).

What is not assessed. Anything about any reseller, licensing solution provider or marketplace. Whether any procurement was improper or what any agency knew. What the register ought to record. What data any contract touches or where it sits. Any supplier's jurisdiction of control. Section 8 carries each in full.

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1 What the record is

The register declares a standard, and the standard says what a supplier is. The AusTender feed publishes under the Open Contracting Data Standard, version 1.1 [D-OCDS-1, sha256 671e848c6b56d5b3…]. In that standard's party-role codelist the role supplier is defined in one line: supplier,Supplier,"An entity awarded or contracted to provide goods, works or services." [D-OCDS-5, sha256 a620f9b75533d552…]. Its release schema describes the award's suppliers as "The suppliers awarded this award. If different suppliers have been awarded different items or values, these should be split into separate award blocks." and the parties block as "Information on the parties (organizations, economic operators and other participants) who are involved in the contracting process and their roles, e.g. buyer, procuring entity, supplier etc. Organization references elsewhere in the schema are used to refer back to this entries in this list." [D-OCDS-4, sha256 bf701ac26180756d…]. AusTender's own extension to the standard adds five fields to the contract, "LtExempt", "LtReasonCode", "LtReason", "Exemption Code" and "Exemption", and two to the amendment; it defines no supplier field of its own [D-OCDS-2, sha256 ec414f2800ccaf34…]. The API specification and its README use the word supplier zero times, counted over each whole text [D-OCDS-3, D-OCDS-3b].

Finance's data dictionary defines the field as what the agency typed. The Department of Finance publishes a four-page data dictionary for the contract notice dataset, created 17 December 2019 [D-FIN-DD, sha256 d59bead013f7b801…]. It opens: A Contract Notice displays details of the contract, including the contract period, value and the supplier. Of its thirty-five fields, the supplier block is Supplier Name, Postal Address, City, Postcode, State/Territory, Country, ABN Exempt and ABN, and the name field is defined as Supplier Name Text Yes Supplier's full company name as entered by the procuring entity. and the identifier as Supplier ABN Numeric Yes The supplier's 11 digit ABN. The dictionary predates the 2025 Rules and its threshold text names a superseded figure; its supplier block matches, field for field, the labels the register's website printed beside a notice on 16 September 2026 under the heading "Supplier Details" [D-AT-1, sha256 dd17280ff2aeafa8…]. That match is a comparison of labels, not a statement that the dictionary is current.

Finance's reporting guide lists what a notice carries. Resource Management Guide 423, *Procurement Publishing and Reporting Obligations*, lists the content of a contract notice as entity details supplier details identify if they are an Australian business or an SME and then the contract details [D-FIN-2, sha256 43b12d46375606ef…]. Under quality assurance it says Relevant entities are responsible for the quality and content of the data that they publish and report on AusTender. and, among the checks an entity may make, where a contract has been novated, supplier details are updated [D-FIN-3, sha256 6ed18d89ac6f9c22…]. The Rules themselves fix the duty: Relevant entities must report contracts on AusTender within 42 days of entering into a contract when it is valued at or above the reporting threshold. [L-CPR-5, sha256 fbcac36fa4084097…, paragraph 7.18].

No document says that the supplier is the contracting party in those words, and that is stated.

The nearest are the codelist's "contracted to provide" and the novation sentence, under which the supplier field follows the party to the contract when the contract moves. Finance's guide says that `Detailed information on how relevant entities should enter data into AusTender can be found in relevant AusTender user guides and onscreen help guidance.` and that `Entity AusTender users can download user guides relevant to their user roles.` [`D-FIN-1`, sha256 `c903de86f6bbe8a9…`]; those guides sit behind an agency login and were not read. The population searched for a public definition of the field is stated in the case record: Finance's reporting pages, RMG 423 and three sub-pages, Finance's site search (which served a bot-challenge interstitial and no results), AusTender's help site and its two document lists, and data.gov.au's catalogue, twenty-one addresses on 16 September 2026. Two documents define or govern the field, the dictionary and the guide, and this section rests on them, on the schema and on the Rules.

What a notice therefore establishes, and what it does not. A contract notice establishes the contracting party: a name as entered, an ABN, an address, and the agency's contact. Of the dictionary's thirty-five fields the only two that describe what was bought are Category, a UNSPSC code the entity selects for the primary purpose of the contract, and Description, `A short, clear and relevant description of the contract.` [`D-FIN-DD`]. No field names a product, a vendor or a manufacturer. The feed's own field list, enumerated over every one of the 62,232 releases, agrees: one supplier party with a name, an ABN identifier, an address and the agency's contact point; one item with a UNSPSC classification code; one description. **On intermediaries the record has one sentence, and it is the strongest thing in this assessment.** RMG 423, under third-party procurement: `Where a supplier has subcontracted all or part of the responsibilities under a contract, that arrangement is not considered a third party procurement. Subcontracting arrangements are not reportable on AusTender.` [`D-FIN-2`]. The Rules place the names of a contractor's subcontractors outside the register and inside a request: `Relevant entities must make available on request, the names of any subcontractor(s) engaged by a contractor in respect of a contract.` [`L-CPR-5`, paragraph 7.21]. Nothing retrieved addresses what an agency enters when a vendor's product is supplied through a reseller or a licensing solution provider. The register's own guidance places a supplier's own suppliers outside the record. A contract notice does not establish whose product was procured, and the register says so by what it declines to carry.

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2 The name field

The name is free text and the ABN is the identifier. The dictionary defines the name as entered by the procuring entity, and the register bears it out. Over P1, the ten ABNs with the most notices carry between 3 and 35 distinct spellings of their holder's name each: the ABN with the most notices, 624, carries 29 spellings; one with 405 notices carries 35. Oracle's ABN, 80 003 074 468, carries 14 spellings of the holder's name over its 72 P2 notices and 15 over its 73 in P1. Counted by `measure.py` over the pinned releases, the spelling being the supplier name string stripped of surrounding whitespace and otherwise as typed.

Two notices in P2 carry one company's ABN under another's name. CN4202251 carries Microsoft Pty Ltd's ABN with the supplier name "Data#3 Limited"; CN4238881 carries Amazon Web Services Australia Pty Ltd's ABN with the supplier name "Palo Alto Networks". The count is over every P2 notice whose ABN's last nine digits are an ACN the instrument holds and whose name does not match that vendor's supplier regex; it is exactly two. Which field is wrong on each, the notice does not say. Where a name and an identifier disagree, this assessment counts by the identifier and names the row.

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3 The instrument

What it is. A list of 132 vendor entries, each with a regular expression over a notice's description, a regular expression over its supplier name, and the ACNs this corpus holds for the vendor where it holds any; a pair of regular expressions that sort a description into resale-shaped, service-shaped, both or neither; and the five prefixes and thirteen regexes that make P2. All three files are published with this assessment, frozen on 16 September 2026 as version 1.0, and every figure below is what `measure.py` prints from them over the pinned releases. A notice *names* a vendor when the brand regex matches its description. It is *direct* for that vendor when the supplier name matches the vendor's supplier regex or the ABN's last nine digits are among its ACNs, and *intermediated* when it names the vendor and is not direct.

Where the list came from, entry by entry. This practice chose the 132 entries on 16 September 2026 from four sources, and the file states each entry's source: 16 because a term of the entry's regex is among the 220 most frequent capitalised tokens in the P2 descriptions; 12 because the vendor is one this corpus has examined in an earlier assessment; 11 because the vendor is among the twenty-five most frequent suppliers in P2 that this corpus had never examined; and 93 from the author's knowledge of the Australian government IT market on that day, from no record. That last source is the largest and it is a judgment. It is published so that it can be disputed, and it was tested against the other three rather than recalled.

What moved after a figure was seen, before the freeze. From the author's account, which is the only source: the 132 entries were written in one pass before the first count and none was added afterwards; three brand regexes, IBM's, VMware's and Google's, were narrowed after the first run on a check for false positives, and the intermediated count fell; and the resale shape terms were widened twice after results were seen. The first-run figures are in no file, the sweep ran outside version control, and nothing on disk can check this paragraph; the open-items register at item 175 records that, with the terms that moved. From the freeze on, no term has moved, and Section 4.3 names a row the frozen supplier regex takes in rather than tightening it.

Sixty-two entries matched no P2 description, and they stay. An entry that was looked for and not found is a true statement about the register: the brand was searched for over 9,461 descriptions and appeared in none. Removing entries because they returned nothing would be pruning the instrument against its own results, which is the thing freezing an instrument before its findings are written exists to prevent. They change no figure, since a brand named on no notice contributes to no count. Of the 220 most frequent capitalised tokens in P2 descriptions, 204 are matched by no entry, and every one of the 204 is a generic word, a category

term or an agency or programme token; no vendor-shaped token is among them. A brand named on fewer notices than the 220th token is outside what that scan can show.

What the instrument cannot see. A brand absent from the list is invisible to the measurement: a notice that names it in the description counts as naming no brand and falls into the 8,827. A description that names no brand at all, "Software", "ICT Equipment", "Licences", is invisible whatever the list holds. The resale and service shapes are a term test over a description string and not a reading of any notice. **This is the same limit Section 1 establishes in the register, appearing in this practice's own instrument: an instrument records what it was told to look for, and the register records what its keeper told agencies to enter.** The reader is given the list before any number it produced so that the number is read with that in view.

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4 The measurement

4.1 Notices naming a brand, and who invoiced

The test. For every entry, the brand regex over each P2 description and the supplier regex or ACNs over the supplier; direct where both match, intermediated where the first matches and the second does not; values summed from the notice's cumulative value at its latest release; distinct suppliers counted by ABN, else by name as typed.

The result. Over the 9,461 notices of P2, 634 name a brand on the list. On 478 of them, worth $1,558,465,860, the supplier is not that vendor; on 160 it is. Four notices are in both counts, direct for one vendor and intermediated for another, so 478 and 160 sum to 638 over 634 notices: three whose description names both Data#3 and Microsoft and whose supplier is Data#3, direct for Data#3 and intermediated for Microsoft (CN4257241, CN4265018, CN4266351), and one whose description names both HP and Veeam and whose supplier is Hewlett Packard Australia, direct for HP/HPE and intermediated for Veeam (CN4220513). The 478 are carried by 146 distinct suppliers. By the shape of the description, 337 of the 478 are resale-shaped ($1,509,044,744), 32 service-shaped ($14,590,632), 36 both ($20,763,953) and 73 neither ($14,066,531); the shape is a term test, and a description reading "Azure Engineer" is service-shaped because of the word and not because anyone read the contract.

Per vendor, for every entry named on three or more P2 notices. Direct and intermediated are over notices naming the brand; the last column is the vendor as supplier of record over every P2 notice whatever its description says, which is the count Section 4.2 rests on.

vendor	named	direct	intermediated	supplier of record, all P2
Microsoft	187	10, $110,391,146	177, $1,451,648,971	32, $131,705,699
Dell	36	25, $6,710,844	11, $2,662,423	408, $237,420,666
Cisco	30	0	30, $7,508,499	8, $7,396,301

vendor	named	direct	intermediated	supplier of record, all P2
SAP	30	20, $10,769,504	10, $1,890,471	47, $51,874,087
Drupal/GovCMS	27	6, $1,196,157	21, $3,685,612	35, $6,875,201
AWS	26	6, $18,624,087	20, $5,690,129	33, $57,957,791
Oracle	21	20, $47,705,124	1, $43,510	72, $148,711,363
HP/HPE	19	8, $3,322,637	11, $1,925,013	329, $166,331,939
VMware/Broadcom	14	4, $12,727,272	10, $13,021,139	17, $260,366,741
Adobe	14	2, $5,744,336	12, $3,500,946	7, $25,371,022
Apple	14	0	14, $873,780	3, $60,610
Atlassian	11	1, $901,562	10, $1,757,651	4, $1,419,121
Jabra/GN	11	0	11, $242,234	0
IBM	10	4, $20,447,260	6, $819,518	26, $204,974,872
F5	10	0	10, $13,370,325	0
ServiceNow	8	3, $17,959,910	5, $9,744,234	18, $56,664,199
Red Hat	8	1, $833,811	7, $1,801,252	33, $46,582,608
Figma	8	6, $307,864	2, $184,371	12, $1,087,877
Salesforce	7	0	7, $9,685,679	0
NetApp	7	0	7, $3,465,164	17, $15,392,929
Fortinet	7	0	7, $2,818,625	0
Tenable	7	0	7, $1,524,582	0
Poly/HP	7	0	7, $172,114	0
Esri	7	7, $955,967	0	13, $76,326,357
Google	6	0	6, $3,659,578	9, $3,141,630
Citrix	6	0	6, $4,353,093	1, $4,724,990
SolarWinds	6	4, $96,760	2, $582,493	8, $571,654
Zscaler	5	0	5, $4,453,312	0
Splunk	5	0	5, $1,979,478	1, $7,947,611
Nutanix	5	0	5, $1,208,095	0
Commvault	5	0	5, $496,113	8, $5,370,665

vendor	named	direct	intermediated	supplier of record, all P2
OpenText/Micro Focus	5	0	5, $711,459	20, $20,263,902
Delinea/Thycotic	5	0	5, $190,904	0
Palo Alto	4	0	4, $1,003,396	1, $6,363,636
Autodesk	4	0	4, $216,533	2, $21,444
Zoom	4	3, $808,498	1, $35,090	3, $808,498
Miro	4	1, $21,000	3, $219,707	3, $969,112
Ivanti	3	0	3, $86,614	3, $117,156
OpenAI	3	3, $94,000	0	4, $154,000
Qualtrics	3	3, $167,743	0	13, $5,050,769
Hitachi	3	3, $84,058	0	28, $70,910,640
Data#3	3	3, $94,179,582	0	515, $2,580,395,966

Seventy entries are named on at least one P2 notice, forty-two on three or more; the table carries the forty-two. The named column counts vendor and notice pairs, so a notice whose description names two vendors appears in two rows: ten notices do, and the forty-two rows sum to 605 pairs, the seventy entries to 644, over 634 distinct notices. The last column counts a notice under every vendor whose supplier regex or ACN it matches, and the two rows Section 2 names are each counted twice by design: CN4202251 under Data#3 by name and under Microsoft by ACN, and CN4238881 under Palo Alto by name and under Amazon Web Services by ACN, because the name and the identifier disagree and this assessment counts by the identifier and names the row. No other P2 notice is counted in more than one vendor's last column. Data#3 appears in it as a vendor named three times and, in the last column, as the supplier of record on 515 P2 notices worth $2,580,395,966. A licensing solution provider, a panel member or a marketplace appearing as the supplier of record is how those arrangements work: the whole-of-government Microsoft arrangement is run through a licensing solution provider by design, and every notice under it names that provider. Nothing in this table characterises any supplier; it counts what the register's supplier field holds.

4.2 Vendors that never invoice

The test, as run. Over every P2 notice, not only those whose description names the brand: for each entry whose brand regex matches three or more P2 descriptions, the count of P2 notices whose supplier name matches the entry's supplier regex or whose ABN's last nine digits are among its ACNs, whatever the description says. A negative over P2 and the regex, and nothing wider.

The result. Nine vendors are named on three or more P2 notices and are the supplier of record on none:

Delinea/Thycotic (named 5, $190,904), F5 (10, $13,370,325), Fortinet (7, $2,818,625), Jabra/GN (11, $242,234), Nutanix (5, $1,208,095), Poly/HP (7, $172,114), Salesforce (7, $9,685,679), Tenable (7, $1,524,582) and Zscaler (5, $4,453,312). Their products reach the Commonwealth, on this register, only through another party's invoice. The supplier regexes are printed in `brand-list.json` beside each entry.

Four vendors that an earlier reading placed on this list are not on it, and the reason is stated. The sweep that preceded this assessment counted a vendor as supplier of record only where the notice's description also named the brand, and on that reading Cisco, NetApp, Citrix and Palo Alto Networks showed zero. Run as the test above states, Cisco Systems Australia Pty Ltd is the supplier of record on 8 P2 notices ($7,396,301), NetApp Australia Pty Ltd on 17 ($15,392,929), Citrix Systems Asia Pacific Pty Ltd on 1 ($4,724,990) and "Palo Alto Networks" on 1, the row under Amazon Web Services Australia's ABN ($6,363,636). Their own notices carry descriptions such as "ICT Equipment", "Network Equipment" and "Software Licencing and Support", which name no brand, so a test keyed on the description could not see them. The earlier reading was wrong and this one replaces it; the sweep's record carries the correction on its face.

4.3 Microsoft

The test. Section 4.1's method restricted to the Microsoft entry: a brand regex covering Microsoft, Azure, M365, Office 365, Windows, VSA, SharePoint, Dynamics 365, Copilot, Intune, Power BI and Microsoft 365 over the description; the supplier regex `\bmicrosoft\b` and Microsoft's two ACNs over the supplier, whatever the description says, for the own-name figure; the intermediary identified by ABN.

The result. Microsoft is the supplier of record on 32 P2 notices worth $131,705,699. Notices naming a Microsoft product under another supplier number 177 and are worth $1,451,648,971; of those, 111 notices worth $1,420,548,714 carry the ABN 31 010 545 267, the licensing solution provider that runs the whole-of-government Microsoft arrangement. **The own-name 32 includes CN4188828, $16,483.50, whose supplier reads "Directions On Microsoft", a firm that is not Microsoft; the frozen supplier regex matches it, and the figure names the row rather than tightening the instrument against its result.** It also includes CN4202251, supplier name "Data#3 Limited" under Microsoft's ABN, the disagreement Section 2 counts.

Read beside what this corpus already established. `AOS-CPI-2026-001` [`P-CPI-1`, sha256 `c5158126154b14fd…`] read AusTender's own report of the contract notices under the whole-of-government standing offer and found six notices worth $2,005,149.19 reported against it, and stated on its face that consumption under the arrangement is not necessarily reported as a contract notice against the standing offer. This assessment gives that stated limit a size and does not revisit that case's claims: over twelve months the register shows $131.7 million contracted in Microsoft's own name and $1,451.6 million contracted in other names for Microsoft's products, where the description happened to say so.

4.4 Amendments

Every figure above is taken over one row per notice at its latest release. The pull holds 62,232 releases for 55,592 notices; 6,640 releases are amendments, across 5,452 notices, and an amendment republishes the notice with its cumulative value and current period, so the latest release is the one counted. Release dates run from

`2025-09-16T00:27:46Z` to `2026-09-16T01:20:22Z`.

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5 The bound

Of the 9,461 notices in P2, 8,827 name no brand on the list. They are worth $7,834,458,684 of P2's $9,653,995,302. The twelve most frequent descriptions among them, from the thirty published with this assessment (`NO-BRAND-DESCRIPTIONS-2026-09-16.tsv`, sha256 `bd50b638775ab965…`):

description	notices	value (AUD)
ICT Hardware	541	185,727,451
ICT Equipment	526	199,055,900
ICT Contractor Services	291	129,215,423
ICT Labour Hire	269	106,260,208
Software Licence	251	137,124,437
Software	208	526,249,099
Software Licence Renewal	193	97,748,567
Computer Equipment and Accessories	139	18,247,583
Computer Equipment	133	9,090,781
ICT Services	106	91,911,426
Software Licence Subscription	105	48,782,704
Software Services	92	69,748,889

None of the thirty names a vendor. Whatever these 8,827 notices bought, and from whose catalogue, the description does not say, and the instrument cannot see it. **Every figure in Section 4 is therefore a floor of what the register shows: 478 intermediated notices is the count among the 634 whose agencies typed a brand into the description, over a list of 132 brands, and nothing is known of the rest. And the register is itself a floor of what was bought, because Section 1's sentence puts a supplier's own suppliers outside it.** A floor of a floor is what this assessment measures, and it is stated at this width and not as a caveat.

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6 What a count by supplier establishes

A count of notices by supplier is a floor for what the Commonwealth buys of a vendor's products. Section 1 establishes that the supplier field names the invoicing party and nothing else; Section 4 shows, for

the notices where an agency named the product, that the invoicing party and the product's vendor differ on 478 of 634. The instances in this corpus are stated with their populations beside them and none is moved: `AOS-TSC-2026-001` [`P-TSC-1`, sha256 `b8957c14e5fb30d5…`] counts 134 published contract notices under one company's ABN, and `AOS-AWS-2026-001` [`P-AWS-1`, sha256 `31208dba64e1c3b8…`] counts 28 agencies as the end users of those 134, each stated on its page as a count under an ABN. Each is exact for its stated population and is a floor for what those agencies buy of that vendor's products, and each says which population it is over.

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7 This practice's own figure

`AOS-BCM-2026-002` is an instance, and it is named here as the one nearest to hand. That assessment, version 1.2 [`P-BCM-1`, sha256 `c2dcdc064f52c4b9…`], states at its section 03: "The Commonwealth has placed AUD 694,715,987 of dependence on a single United States controlled software vendor", counted, as its section 06 states, from every contract notice whose supplier field contains "VMware" published between 13 May 2023 and 13 May 2026. By Section 6 that count is a floor. It was exact for the population its section 06 named and it was presented as the dependence; the words "at least" were absent. A post-publication note of 16 September 2026 in that case's record, and entry BCM-1 in this practice's corrections register, record that the figure is a floor and that no reader was served a false count; the published document was not modified, and this assessment does not re-measure its window.

What this assessment's own window shows for the same vendor. Over P2, VMware entities are the supplier of record on 17 notices worth $260,366,741, and 10 notices worth $13,021,139 name a VMware product under another supplier. That is about five per cent, in a later window than the earlier assessment's, under Section 5's bound that most notices name no product at all. It is an indication of scale and not a re-measurement.

Why it is here. A case establishing that supplier-field counts are floors, published by a practice whose own published count was one, either names that or looks as though it is hiding it. Naming it is also the strongest evidence this assessment has that the error is easy to make: the earlier assessment stated its population on the same page, and the count was still read as the measure.

Limitations

The pull is one window and one day, 16 September 2026, under one agent from one address; the feed served this practice's contact string and the website did not. Fourteen inherited rows are unmeasured under convention 50, because the sweep's pull made each request once; the two Commonwealth Procurement Rules rows carry their origin's stability, each fetched twice within the minute on 8 September 2026 with equal hashes. The category descriptions the filter names are the website's text for one notice per code on that day; the feed carries codes only. The filter is a filter: 1,422 P2 notices are in on a title word alone and 700 IT-shaped

titles in the management and personnel segment are out, the 700 counted by the word list in the sweep's `analyze.py` [GF-SCRIPT-4] over one row per notice and not by the frozen instrument, which carries no such list; different terms give a different P2. The brand list is Section 3; the resale and service shapes are term tests. The supplier name is what the agency typed, and matching by ACN is only as good as the ABN the agency entered. Amendments carry cumulative values and the register does not disclose per amendment how much supersedes and how much adds. Nothing here reaches any notice below the $10,000 reporting threshold, any standing offer, any grant, or any notice withheld under a confidentiality flag. Finance's data dictionary is a 2019 document whose threshold text predates the 2025 Rules; its supplier block is compared to the labels printed today and no more.

On the fifteen browser-form captures, fourteen of them pinned unstable. The served bodies hashed differently on the two fetches made within the minute. On every one of them the difference, measured against two further fetches about an hour later, lay in per-request tokens the servers issue, anti-forgery fields, script nonces, render hashes and a monitoring block, and the visible text was identical. This assessment quotes from six of those captures; every quoted string was present, byte for byte after whitespace folding, in the pinned body and in both later fetches. The second bodies of the original pairs were not kept, so that comparison is against later fetches and not against the body the log hashed; what it establishes is that these pages carried the same text across every fetch this practice made, not what the discarded second body held. The register's word for these rows is unstable, and this paragraph is what the word covers.

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8 What this assessment is not

It is not a finding about any reseller, licensing solution provider or marketplace. A reseller on a notice is how panels, licensing solution providers and marketplaces work. No supplier is characterised.

It is not a finding that any procurement was improper, or that any agency did not know what it bought. Nothing in the register speaks to either, and this assessment asserts neither.

It is not a recommendation that the register record anything else. What an instrument ought to record is a matter for its keeper.

It is not a finding about what data any contract touches, where it sits, or whether any certified service is involved. The notice does not carry it.

It is not a resolution of any supplier's jurisdiction of control. This assessment resolves no supplier to a jurisdiction and uses none of this corpus's resolutions.

It is not a measurement against the Commonwealth Procurement Rules. A figure on the reporting of limited tender conditions came out of the same pull; it is about agency conduct against a rule and does not belong in an assessment of what the register makes visible about suppliers.

It is not a re-measurement of `AOS-BCM-2026-002`'s window, and not advice to any agency, vendor or supplier.

Related published assessments

- **AOS-CPI-2026-001**, *Who the Record Names*. The whole-of-government Microsoft arrangement and the six notices reported against it.
- **AOS-BCM-2026-002**, *Broadcom Structural Exposure Assessment*, v1.2. The AUD 694,715,987 figure, and its post-publication note of 16 September 2026.
- **AOS-TSC-2026-001**, *Sovereign, Undefined*, v1.1 (v1.0 was published as *Sovereign, Once*). 134 notices under one ABN.
- **AOS-AWS-2026-001**, *Where the Record Stops*, v1.1. The 28 agencies on those 134.

References

Every artefact this assessment cites is pinned by SHA-256 in this case's register, `archive/manifest.tsv`, 45 rows, and every quotation is listed with its blob and hash in `QUOTATIONS-2026-09-16.tsv`. The register's own documents: `D-OCDS-1`, `D-OCDS-2`, `D-OCDS-2b` (cdn.tenders.gov.au, the extension and its schemas); `D-OCDS-3`, `D-OCDS-3b` (the API specification on SwaggerHub and the austender-ocds-api README); `D-OCDS-4`, `D-OCDS-5` (Open Contracting Data Standard 1.1.5, release schema and partyRole codelist); `D-AT-1` (contract notice CN4276656 as served); `D-FIN-DD` (Department of Finance, Contract Notice Dataset data dictionary, PDF, December 2019, via data.gov.au); `D-FIN-1` to `D-FIN-4` (Department of Finance, Resource Management Guide 423, four pages as served); `L-CPR-5` (Commonwealth Procurement Rules 17 November 2025, F2025L01263, authorised PDF, inherited from `general-findings/commonwealth-procurement-rules-2026-09`). The pull: `GF-PULL-1`, `GF-PULL-2`, `GF-CAT-1` and eleven further rows inherited from `general-findings/austender-buyer-sweep-2026-09`. This practice's published assessments: `P-BCM-1`, `P-CPI-1`, `P-TSC-1`, `P-AWS-1`. The instrument: `brand-list.json`, `shape-terms.json`, `filter-terms.json`, `measure.py`, published with this assessment.

End of document.