20 September 2021

Communications Alliance
Level 12, 75 Miller Street
North Sydney NSW 2060
Via email: info@commsalliance.com.au

Re: Industry Code, DR C666:2021: Existing Customer Authentication Draft.

The Australian Communications Consumer Action Network (ACCAN) appreciates the opportunity to comment on Industry Code DR C666:2021, Existing Customer Authentication.

About ACCAN

ACCAN is the peak body that represents all consumers on communications issues including telecommunications, broadband, and emerging new services. ACCAN provides a strong unified voice to industry and government as consumers work towards availability, accessibility, and affordability of communications services for all Australians.

Consumers need ACCAN to promote better consumer protection outcomes ensuring speedy responses to complaints and issues. ACCAN aims to empower consumers so that they are well informed and can make good choices about products and services. As a peak body, ACCAN will represent the views of its broad and diverse membership base to policy makers, government and industry to get better outcomes for all communications consumers.

ACCAN Response

ACCAN recognises the essential nature of this Code to protect consumers and to ensure appropriate mechanisms are in place to ensure authenticity of customer interactions with providers, while protecting customer privacy and information, as well as ensuring that consumers can maintain their chosen telecommunication services and are protected against fraud or misconduct.

ACCAN supports the intent of this industry Code and recognises its necessity in a world where fraudulent activity is on the rise. ACCAN understands that this type of activity costs telecommunications consumers considerable frustration, time and harm. Fraudulent activity can result in loss of service, unauthorised charges and loss of control of vital telecommunications services.

There are a couple of points, however, which ACCAN strongly asserts would strengthen the Code. Thus, ACCAN recommends further clarification of the following clauses to ensure maximum protection for consumers. These points chiefly lie around where the Code references or links to other Codes, or where appropriate linkages are not sufficiently described. This could lead to consumers having difficulty accessing services owing to telco front-line staff being unaware of specific requirements or general guidance which may be useful in some cases.

Point One

1.3.5 The Code does not apply to procedures relating to the onboarding of new Customers.

ACCAN asserts that to provide clarity for consumers and telco front-line staff, appropriate onboarding procedures for new customers should be referenced here. Further, the Code makes no reference to how customers should be informed about the Code, and how future identification processes will be established.

Point Two

3.2.2 Customer facing customer service solutions must ensure appropriate levels of Customer Authentication. NOTE: These solutions should use visual identity documents e.g., a Government Document.

This point should be clarified to provide some additional framing around what documents are acceptable, particularly for front-line sales and support staff. Typically, the first option would be a driver's licence, however ACCAN is aware of many reported cases of individuals who do not have driver's licences being refused service by a telco, because no other sufficient document is available, even where the customer has government issued photo identification. Many services have a list of acceptable documents, and this should be referenced here for clarity. Additionally, greater definition around what constitutes a primary identity document would strengthen the Code.

Point Three

3.2.8 CSPs must ensure all high-risk transactions are secured via Multi Factor authentication. NOTE: If available, CSPs should promote Customer self-service for processing of high-risk transactions or the use of a 2-way communication system that includes text-based information for high-risk transactions to allow the account holder to review and approve.

It should be stated here that such methods of self-service should be universally accessible and comply with the latest WCAG standards to ensure full accessibility for people with a disability. Given the fragmented understanding telco staff frequently have of the needs of people with disabilities, self-service is often an easier way for consumers with disabilities to manage telco services. However, these consumers are frequently locked out of using these services owing to access issues.

Many consumers, owing to age, disability or other factors, are not able to use online self-service options. It is vital that legacy authentication options are maintained for people who cannot use online services, or who do not have the appropriate technology or skills to use more secure methods.

Conclusion

It is vital to ensure all customers are afforded the right to transact their telecommunications business securely and with confidence. Any authentication process must be accessible to everyone.

Acknowledging the points listed above, ACCAN supports this Code. It offers consumers strong protection against fraud and other illegal activities and paves the way for telecommunications

providers to transact business securely and in the knowledge they are doing so in their customers' best interests.

I remain available should you require any further information.

Yours sincerely,

Vaughn Bennison
Disability Policy Officer
ACCAN