

2 December 2016

ACMA Consultation on the Draft Telecommunications (Service Provider – Identity Checks for Prepaid Mobile Carriage Services) Determination 2016

ACCAN thanks the ACMA for the opportunity to comment on the revised identity-checking requirements for prepaid mobile services, as set out in the Draft Telecommunications (Service Provider – Identity Checks for Prepaid Mobile Carriage Services) Determination 2016 (the Determination).

ACCAN is the peak consumer representative body in the telecommunications sector and works to ensure that all consumers have available, accessible, and affordable telecommunications services. Prepaid mobile services provide essential telecommunications for a range of consumers and as such ACCAN supports a Determination that enables all consumers to obtain prepaid services without undue burden.

ACCAN was consulted on the Prepaid Determination Review Working Group's (the working group) draft report in June 2016. In its feedback ACCAN outlined its broad support for the working group's 17 recommendations, and is thus pleased to see that the ACMA has agreed to support them.

However, in addition to its support for the recommendations, ACCAN also outlined additional concerns surrounding barriers faced by recent migrants and Indigenous Australians in remote areas. ACCAN is also aware of additional barriers caused by prepaid identity checking requirements faced by people with disability, and by victims of domestic violence.

Issues for new migrants

The main issue is that temporary forms of identification issued to migrants by the Department of Foreign Affairs and Trade are often not recognised by retail staff and are rejected. In June ACCAN recommended that the Determination be amended to specifically mention such forms of temporary ID as acceptable or alternatively allowing migrants to certify their identity via a statutory declaration.

In its final July 2016 report the Working Group notes that the determination allows for a visa to be used as a form of ID and therefore changes recommended by ACCAN are not required. ACCAN accepts this finding.

Issues for Indigenous Australians

ACCAN is pleased to see that recommendation 11 aims to make it simpler for Indigenous Australians who lack the requisite ID to activate a prepaid service by providing a statutory declaration. The ACMA consulted with ACCAN on the class of people able to sign such a declaration, and in consultation with its members representing Indigenous Australians, ACCAN submitted that the class should be broad (similar to the class of people used by Medicare).

Issues for victims of domestic violence

ACCAN has been made aware of barriers faced by people fleeing domestic violence situations who wish to activate a prepaid service. These people face issues when they do not have ID with them, or because it is not safe for them to reveal their identity or whereabouts.

ACCAN encourages the ACMA to continue to work with community and welfare groups who assist victims of domestic violence, as well as with WESNET, which has a particular interest in this area.

People with Disability

ACCAN is pleased that the determination includes expanded Document Verification System (DVS) and credit card provisions, which should address current issues for People with Disability obtaining a prepaid service.

ACCAN thanks the ACMA again for the opportunity to comment on the draft Determination, which when implemented, will break down barriers currently making it difficult for consumers to access prepaid services.

Yours Sincerely



Jeremy Riddle
ACCAN