



Review of the Calling Number Display Code (ACIF 522:2007)

Submission by the Australian Communications Consumer Action
Network to Communications Alliance

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About ACCAN

The Australian Communications Consumer Action Network (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 activate its broad and diverse membership base to campaign to get a better deal for all communications consumers.

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1. Executive Summary

ACCAN welcomes the opportunity to comment on ACIF C522:2007 on Calling Line Information (CLI) and Calling Number Display (CND). Our submission makes the following recommendations:

- That the requirement to provide clear information about the significance of CND and the availability of CND blocking and enabling be strengthened;
- That the Code require that sufficient notice be provided to consumers when a change to network technology means that CND blocking or enabling will no longer be available;
- The extension of the consumer protections in the Code to mobile services; and
- That the status of VoIP services under the Code be revisited. In particular, the status of voice services over the National Broadband Network should be determined.

2. Comments on ACIF C522:2007

2.1. Consumer awareness

While s 4 of the Code sets out requirements for informing Customers of CLI/CND and their options to have Blocking or Enabling activated, more could be done by Suppliers to ensure that this information is readily accessible to consumers.

For example, the Optus 'Call Display' page¹ can be reached through the 'Call & Voice Features' page, which is in turn reached via a drop-down menu on the Optus home page. There is no clear link to this information from the '\$30 Phone Plan' page² that a Customer is most likely to see when they consider signing up for an Optus home phone. Moreover, the level of information available on the 'Call Display' page is well below the level of information required under s 4 of the Code. For instance:

- There is no reference to 'Caller Line Identification' or 'CLI';
- There is no reference to services such as SMS that cannot support Blocking or Enabling;
- There is no explanation of CND for international calls;
- There are no examples of why Customers may wish to enable Blocking.

While these details may be available elsewhere on the Optus website or in bills, brochures or newsletters, the 'Call Display' page is likely to be the primary avenue through which consumers find out about the Blocking and Enabling options offered by Optus.

¹ <<https://www.optus.com.au/shop/homephone/offersextras/callandvoice/features/calldisplay>>

² <<https://www.optus.com.au/shop/homephone/plan/30>>

The presentation of information about CND Blocking and Enabling should also be such that the consumer is aware that Blocking and Enabling are free.³ In an FAQ entry,⁴ Telstra sets out the option of permanent blocking as follows:

Permanent blocking

Home phones: we can block your home phone so that your name, home telephone number and address are not listed in the White Pages® directory or on directory assistance services. We will also hide your number on Calling Number Display when you call others. A monthly fee of \$2.93 applies for residential services (this appears under Services and Equipment charges on your bill).

While Telstra clearly states elsewhere on its site that CND blocking is provided without charge,⁵ descriptions of the service such as the one quoted above are likely to confuse a consumer into thinking that blocking is offered as a single service—along with the number being removed from the White Pages and directory assistance—for a monthly fee.

In light of these examples, we suggest that the Code be amended to require suppliers to provide all key information about CND (i.e. the requirements under cl 4.1.1) in a single, clearly marked, easily located, and unambiguous manner. The presentation of ‘Critical Information Summaries’ under the Telecommunications Consumer Protection Code, for instance, is subject to a number of requirements—a CIS must be a separate document, no longer than two pages, that is readily accessible on the provider’s website, linked from the advertisement for the relevant offer, etc.—which could serve as a useful template for the information required under cl 4.1.1 of the Code.

One option, which ACCAN recommends, would be to include a template information document as an appendix to the Code that could be used by suppliers to provide the required information in a clear and accessible format.

2.2. Changes to Supplier’s ability to support Blocking or Enabling

Under cl. 3.8.1, a supplier must inform a customer with sufficient notice if a network cannot support blocking or enabling. Under cl. 3.8.2, a supplier must free customers from their contracts if the customer wishes to leave as a result of a technological change to the network such that CND blocking or enabling is no longer supported.

We suggest that a further clause is required here to ensure that, when a technological change is made to the network such that blocking or enabling is no longer possible, a customer receives notice with sufficient timing and content to allow the customer to make a decision to leave a supplier. The existing provisions under clauses 8.3.1 and 8.3.2 do not appear to establish such a requirement.

³ Assuming, of course, that Blocking or Enabling is enabled for the service only once in six months, as per the Code.

⁴ <https://help.telstra.com/app/answers/detail/a_id/16981/c/1986>

⁵ Telstra’s customer terms for basic telephone services, for example, note that there is no charge for CLI blocking; see <<http://www.telstra.com.au/customer-terms/download/document/fixed-general.pdf>>.

2.3. Mobile services

As the Code stands, it does not apply to mobile connections. With the ever-increasing uptake of mobile phones as a standard telephone for many consumers, the protections of the Code should be extended to mobile lines.

2.4. VoIP and NBN voice

The explanatory statement of the existing Code notes that CND blocking is not possible with many VoIP services and that, as a result, VoIP providers are only required to comply with the Code as far as is possible. This situation should be revisited in order to determine whether it is now possible to block CND on newer VoIP systems and, if so, that VoIP services be covered by the general requirements of the Code.

The application of the Code to VoIP services is particularly important due to the migration of many traditional telephone services to the NBN. Since voice services over the NBN will largely replace traditional voice services, it is important to establish that CND blocking is technically possible and the providers of voice over NBN services are bound by the same requirements as providers of traditional voice services under the Code.