



**Response to proposed variation to Numbering  
plan - charges for calls to freephone and local  
rate numbers**

Submission by the Australian Communications Consumer  
Action Network to the Australian Communications and  
Media Authority

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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.

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 activates its broad and diverse membership base to campaign to get a better deal for all communications consumers.

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# Executive Summary

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Arrangements for 1800, 13 and 1300 numbers have been the subject of several inquiries over many years. Reform for charging arrangements is now at an exciting point where all parties are discussing the most practical way to implement reform.

ACCAN's response to questions about implementation has been guided by four principles. Ultimately, consumers need a system that is consistent, certain, clear and affordable. The current method of charging for 1800/13/1300 calls does not meet these principles – consumers are left out of pocket and confused as they pay per minute rates to call freephone and local rate numbers from their mobile phone but pay nothing or a low-flat rate from their landline.

It is clear that 1800 freephone numbers need to be genuinely free to call from all phones. The best way to achieve this outcome is to vary the Numbering Plan. Other amendments should be made to the Numbering Plan to guarantee certainty for pre-paid mobile phone users who have run out of calling credit and still need to make calls to essential numbers.

Arrangements for 13/1300 or local-rate numbers have been carefully considered against claims that consumers would be disadvantaged by a system where mobile calls to these numbers would be charged at a 22 cent flat rate. To properly assess the concerns raised by Communications Alliance and AMTA, ACCAN has commissioned external research which found that amending the Numbering Plan so that all calls to 13 numbers cost a low, flat-rate is in the best interest of the majority of consumers. This change also has the advantage of having already received wide support from the community sector and the community at large.

ACCAN recognises that changes to 18, 13 and 1300 numbers presents financial and staff costs to the telecommunications industry. But when these costs are considered against the cost to consumers of maintaining the status quo, the cost to other organisations to accommodate a failure to change and the possible revenue providers stand to gain from two number ranges given a clear and revitalised purpose, it becomes apparent that changing charging arrangements is in the best interests of the majority of parties.



# Response to Consultation Paper

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ACCAN thanks the ACMA for the opportunity to provide comment on the *Proposed variation to Numbering Plan – charges for calls to freephone and local rate numbers* consultation paper. The ACMA should be commended for progressing this issue to a stage where all parties are discussing viable solutions to a problem affecting all mobile consumers. Communications Alliance (CA), AMTA and key members of industry should also be commended for positively engaging with the ACMA proposal.

ACCAN supports the ACMA objectives of amending Freephone and Local Rate Number (FLRN) arrangements to address the changing usage patterns of consumers, the intent of legislation and improved price transparency. Any solution aiming to meet these objectives must result in:

- **Consistency** – Charging or other arrangements for FLRNs must apply to all mobile service providers.
- **Certainty** – Parties should guarantee long-term, permanent changes for FLRN charges. Changes which have the possibility of being rolled-back with a company change of practice are less desirable.
- **Clarity** – Charges should be easy to understand and apply across all technologies. Simple, well-promoted consumer education efforts need to be undertaken to explain any changes.
- **Affordability** – Current charging arrangements result in unaffordable and sometimes unexpected costs for consumers. FLRN services must be reasonably affordable for both consumers making a call and organisations who receive calls (the B-party).

ACCAN has used these principles in assessing which solution will work for the majority of consumers: Option A, an amendment to the Numbering Plan, or Option B, the industry proposal.

## 1. 1800 numbers: the way forward

### 1.1 The ACMA should proceed with amendments to the numbering plan for 1800 numbers

Options A and B apply the same approach to changing arrangements for 1800 numbers. Both proposals support making calls to 1800 numbers free through a legislated change to the Numbering Plan.<sup>1</sup> ACCAN supports varying the Numbering Plan to make freephone numbers genuinely free to call – this approach meets the principles of consistency, certainty, clarity and affordability.

#### **Recommendation:**

- **The ACMA varies the Numbering Plan so that 1800 numbers will be free to call from mobile phones, making amendments 2, 5 and 6 as proposed in Option A of the consultation paper.<sup>2</sup>**

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<sup>1</sup> ACMA (2012), *Proposed variation to Numbering Plan – charges for calls to freephone and local rate numbers. Consultation paper*, ACMA, p 9.

<sup>2</sup> *Ibid* pp 7-9.

## 1.2 A formal arrangement is needed for pre-paid credit expiry and 1800 calls

ACCAN commends the CA/AMTA proposal for including consideration of pre-paid credit expiry and 1800 calls. As has been recognised in the multiple inquiries, many freephone and local-rate numbers are connected to essential services. High costs or restricted access to call these numbers has a detrimental effect on all consumers, but particularly on vulnerable consumers.<sup>3</sup>

CA and AMTA have proposed that the three main mobile carriers (Telstra, Optus and Vodafone) would allow pre-paid customers to make calls to 1800 numbers when they have no phone credit, as long as the phone service has not been suspended or disconnected.<sup>4</sup> This would be a great outcome for Telstra, Optus and Vodafone customers but the proposal needs to be extended to all mobile services. While the current retail market share of Mobile Virtual Network Operators (MVNOs) is at 5% (or approximately 1.215 million mobile services)<sup>5</sup>, the ACCC has predicted greater opportunities for MVNOs in the future as Telstra and Optus have provided different wholesale offerings.<sup>6</sup> This issue will become relevant to a growing number of consumers.

The CA/AMTA proposal provides no detail about how calls to 1800 numbers from pre-paid phones without credit would be implemented and if it would be guaranteed for any period of time. Access to 1800 numbers when credit expires is too important to be restricted to the three main mobile carriers, any of whom may change their policy on pre-paid access to 1800 numbers with the release of a new product. To protect consumers, provide clarity and ensure consistency of application across the mobile industry, the ACMA should vary the Numbering Plan so that calls to 1800 numbers are free from pre-paid mobile phones without credit (excepting suspended or disconnected services).

### Recommendation:

- **The ACMA varies the Numbering Plan with the following:**

#### Dictionary:

**The definition of *freephone service*, at paragraph (b) after “is zero” add the words: “and applies to all active standard telephone services regardless of credit availability.”**

## 1.3 Timeframe for implementation

The FLRN market is relatively small. There are 291,000 FLRNs owned by approximately 100,000 different organisations.<sup>7</sup> Looking exclusively at 1800 numbers, at last count there were 115,000 different numbers.<sup>8</sup> As a comparison, Telstra had over 6.4 million post-paid

<sup>3</sup> ACCAN (2011) *Response to Implications of research into consumer issues (Numbering consultation four)*, [http://accan.org.au/index.php?option=com\\_content&view=article&id=342:submissions-template&catid=141:phones&Itemid=174](http://accan.org.au/index.php?option=com_content&view=article&id=342:submissions-template&catid=141:phones&Itemid=174)

<sup>4</sup> ACMA (2012), *Proposed variation to Numbering Plan – charges for calls to freephone and local rate numbers. Consultation paper*, Attachment B (CA and AMTA Proposal) p 7

<sup>5</sup> This number is 5% of the 24.3 million mobile services in Australia as at June 2012. ACCC, (2013), *Telecommunications Competitive Safeguards for 2011-2012*, Commonwealth of Australia, ACT p 11.

<sup>6</sup> *Ibid* p 18.

<sup>7</sup> Communications Alliance/AMTA, November 2010, *Response to ACCAN/ACOSS/AFFCRA submission on the Cost of Accessing 1800 and 13/1300 Services from Mobile Phones* p6.

<sup>8</sup> *Ibid* p 6.



mobile subscriptions in 2010-11.<sup>9</sup> While recognizing that the changes discussed will result in providers needing to make technical and operational changes, ACCAN maintains that changes should be achieved before 1 January 2015. Regardless of whether option A or B is chosen, the ACMA should work towards the shorter time-frame that CA and AMTA have indicated is possible.

**Recommendation:**

- **Any action resulting from the *Proposed Variation to the Numbering plan – charges for calls to freephone and local rate numbers Consultation paper* should work to a 2014 deadline.**

## **2. Additional research: will consumers pay more for 13/1300 calls under Option A or B?**

The CA/AMTA proposal states that “there is a strong potential for [the ACMA proposal] to create consumer detriment” as “the majority of consumers will be paying higher average costs for calls from mobiles to 13/1300 numbers if such calls currently charged as standard calls within included-value allowances are charged at local rates outside included-value plans.”

This is a serious claim that ACCAN has thoroughly considered. Is it true that most or even any consumers would pay more to call a 13/1300 number from a mobile should option A be implemented? To answer this question, ACCAN commissioned an independent research company, ACA Research, to assess a significant sample of mobile phone plans. The research was divided into two sections – one which used desk research to analyse a range of mobile phone plans and the other which used product testing for a small number of pre-paid plans.

### **2.1 Analysis of mobile phone plans: methodology and approach**

ACCAN worked with ACA Research to develop a research project that would determine how many minutes of calls a consumer could make to 13 numbers for a significant range of mobile phone plans. A full outline of the approach and findings is detailed in Appendix One.

The challenge of assessing the actual value delivered by included value plans was difficult and ACCAN recognises that the final methodology used provides a solid but not definitive guide of ultimate value for these plans. ACA Research analysed 40 different phone plans, taking into consideration all variables to determine a cost per minute rate for products, assuming products were used exclusively to call 13 numbers. This assumption underpinned research with the acknowledgement that, although the situation is extremely unlikely, included value plans offer the consumer a “bucket” of value that can be spent in multiple ways and this approach offered a consistent method of deducing and comparing call costs.

In reality, a mobile phone company never actually provides a consumer with “\$500” for \$50. These plans are actually offering “500 credits” for \$50, which can then be spent in multiple ways – the value any one consumer derives from an included value plan will vary. The ACMA has already acknowledged the difficulty of determining actual value delivered with this kind of product.<sup>10</sup>

<sup>9</sup> Telstra, (2011), *Telstra Annual Report 2010-11* p11.

<sup>10</sup> ACMA (2011), *Reconnecting the Customer Inquiry: Final Report*, ACMA, Melbourne, p 82.



It must be noted that this analysis presumes that should the ACMA proceed with Option A that all providers would charge post-paid customers 22 cents on top of “plan value” for 13 calls. This is a worst-case-scenario and presumes that providers will not accommodate the changes into existing or new plans. ACCAN imagines that, at the very least, providers would find a way to accommodate the new charging structure for consumers using high-end monthly plans. In a competitive mobile market, we should expect to see a variety of offerings from industry that accommodate a maximum charge requirement for 13/1300 numbers across low to high end products.

## 2.2 Analysis of mobile phone plans: findings

The research demonstrates that, in all but a few exceptional cases, consumers will **not** be paying higher average costs for calls from mobiles to 13/1300 numbers if Option A is implemented.

For example, the Telstra pre-paid Cap Encore plan (\$30 option) offers users “\$250” worth of included value. Assuming that the plan is only used to make 13/1300 calls, the effective actual call rate is 15 cents per minute. A two-minute call using this plan actually costs the user 30 cents. A five-minute call would cost 75 cents. A twenty-minute call would cost \$3 (or, effectively, use up a tenth of the total credit). A consumer using this product would be better off if the ACMA implemented option A and all 13 calls, no matter how long, were charged at a 22 cent flat rate.

Looking at the 17 post-paid plans examined, the Vodafone \$35 and \$45 plans delivered an actual call rate of 10 and 9 cents per minute, respectively. For these two plans, the actual call rate for a two-minute call to a 13/1300 number would be less than 22 cents. Any call over two-minutes would cost more than 22 cents under these plans. For all other post-paid plans, the actual call rate was over 12 cents per minute, meaning that consumers would “pay less” if they were charged a 22 cent flat rate for a two-minute (or longer) 13/1300 call than if they were charged within the plan value.

For example, the Optus \$80 plan gives users “\$850” of “included value”. The actual call rate a user gets for \$80 is 12 cents per minute. Under this construct, a two-minute call to a 13/1300 number costs 24 cents. A five-minute call costs 60 cents. A twenty-minute call costs \$2.40.

Within the forty plans examined, there were four products where an actual rate per minute could not be calculated as, under certain parameters, the product allowed unlimited calls to 13/1300 numbers. These were:

- The Optus \$2 Days product (if used daily, an approximately \$60/month product)
- The Redbull \$199 – 180 days expiry product
- The Redbull \$365 – 365 days expiry product
- The Dodo Unlimited starter pack for \$49

These plans are all mid-to high spend pre-paid products but do represent good value for consumers who use them for calls. It must be noted that all of these products use unusual charging constructs – they are the exception rather than the norm in the pre-paid mobile market. Unlimited call offerings also exist in the high-end of the post-paid mobile market.



In cases where “unlimited” calls are available to the user, it’s difficult to calculate whether a consumer would “pay more” to make 13/1300 calls as no actual per-minute rate can be identified; it all depends on how the plan is used. For example, if a caller used the Optus \$2 days product to make a two-minute call to a 13/1300 number and made no other calls, texts or data usage that day, the effective rate for that call would be \$1/minute. Even if the caller used the Optus \$2 days product to make a twenty-minute call to a 13/1300 number, and made no other calls, texts or data usage that day, the effective rate would be 10 cents per minute but still \$2 total – more than a 22 cent flat rate. However, if the user made ten calls of any length to a 13 number, they would be charged \$2 under the Dollar Days charging construct, but \$2.22 if a flat rate of 22 cents applied outside of this construct.

People using “unlimited” products would sometimes “pay more” if they were charged 22 cents outside of the plan value for a 13 call but only if they made a high level of calls. What now must be considered is if these consumers would be better or worse off under option A or B and this is difficult to determine: the answer must be supplied by the mobile phone provider. Mobile phone providers will have a choice as to whether high-end unlimited call plans will be able to accommodate 13 calls or not.

### 2.3 Testing of mobile phone plans: methodology and approach

ACCAN balanced the desk-based research above with real-world tests of pre-paid mobile products to look at the cost of 13 calls for consumers making typical calls. ACA Research tested how many calls to 13/1300 numbers could be made from five pre-paid plans. Testers made calls for their own purposes – calling government numbers, charities and businesses. Call length was determined by how long the tester needed to complete a task such as checking their bank balance, reporting to Centrelink or getting information from a charity. This method was chosen to provide a sense of how callers would use their phone to make typical calls to 13 numbers. The full results of the product testing research are outlined in Appendix Two.

### 2.4 Testing of mobile phone plans: methodology and approach

The results show a great deal of variation in the length of calls made. Call length ranged from one minute to 106 minutes, with most calls lasting over five minutes. This experience rings true with anecdotal evidence from consumers, who notice that many calls to 13 numbers take longer than calls to friends and family as they have to navigate IVR phone systems and wait for a customer service representative.

With all products tested, consumers would have been significantly better off if they were charged a flat rate of 22 cents for calls to 13/1300 numbers. For example, consumers using the Optus \$30 Long Expiry Cap receive “\$50” credit that can be used for 13/1300 calls. This entire amount was used across three calls totaling 51 minutes. Essentially, it cost \$30 for 51 minutes of talk time. If Option A was implemented, this tester would have paid 66 cents in total for the three calls, saving \$29.34.

### 2.5 Overall conclusions to draw from research

In summary, the conclusions drawn from both pieces of research are:

- Consumers using pre-paid mobiles that do not offer unlimited calls would have a lower call rate for 13/1300 calls under option A.

- Consumers using post-paid plans that do not offer unlimited calls would have a lower call rate for 13/1300 calls under option A for all calls over two minutes and, in most cases, all two-minute calls.
- Some consumers using plans that offer unlimited calls could have a higher call rate for 13/1300 calls under Option A, but this would only apply if they also had a high volume of calls. The ACMA must also consider if providers will accommodate any changes to 1300 numbers into these high-end plans.
- Looking at pre-paid plans in a test-environment, consumers using low to mid-range pre-paid mobile plans would be significantly better off under option A.

Option A best caters for the low-to-medium end of the mobile market but would work better for the majority of consumers. Based on this ACCAN strongly recommends that the ACMA proceeds with Option A for 13/1300 services.

### **3. 13/1300 numbers: the way forward**

#### **3.1 Option A or B? Additional considerations for 1300 plan inclusions and call costs**

##### **Included value and pre-paid customers**

The CA/AMTA proposal rests on the premise that the majority of consumers are using included value style plans. While acknowledging the difficulty of sourcing accurate statistics, the proposal suggests that approximately 80% of post-paid consumers in 2013 and 100% of post-paid consumers by 2015 use will use included value plans.<sup>11</sup> No reference or indication of where this statistic is sourced is provided. At present, the statement rests on assertions unlinked to quantitative evidence.

The CA/AMTA proposal fails to consider pre-paid customers, many of whom use products without the included value construct. Pre-paid mobile services represent 38.4% of the market, with 11.64 million services as of June 2012.<sup>12</sup> Pre-paid customers cannot be charged additional amounts outside of what they have already paid to their provider. Even if pre-paid mobile customers do use an included value style product, providers must charge fees out of the money provided up front – this consumer will not “pay more” for 13 calls but their credit may be structured differently if Option A is introduced.

##### **Consumers should not have high levels of excess value under included value plans**

The CA/AMTA proposal assumes that consumers will be better off if 13/1300 calls are included in mobile plan value because the majority of mobile consumers (90%+) on included value plans do not exceed their call allowance.<sup>13</sup> This statistic was not referenced or any indication given as to the source of the data. If valid, this statistic needs to be put in context of trends within the wider mobile industry.

As of 1<sup>st</sup> March 2013, the Telecommunications Protections Code requires that bills for products with included value aspects must provide consumers with the total charges for the

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<sup>11</sup> ACMA (2012), *Proposed variation to Numbering Plan – CA and AMTA Proposal*, p 8.

<sup>12</sup> This statistic includes mobile data services, like dongle services, but is the closest estimate of the pre-paid market publicly available, see ACMA (2012), *Communications Report 2011-12*, ACMA, Melbourne, p 32.

<sup>13</sup> ACMA (2012), *Proposed variation to Numbering Plan – CA and AMTA Proposal*, p 10.

last three billing periods.<sup>14</sup> This means that consumers will be able to easily compare their monthly spend and adjust their plan if they are constantly spending under or over the plan amount. This tool could and hopefully will lead to consumers choosing products appropriate to their use. Increased spend management tools will also allow consumers to carefully use included value style plans in a way that will allow them to spend close to all of their total value in a controlled way. Industry cannot and should not expect consumers to have significant amounts of included value left over each month.

### **Uptake of 18/13/1300 “friendly” phone plans**

The CA/AMTA proposal refers to the growing trend of “1800/13/1300-friendly” mobile plans.<sup>15</sup> ACCAN acknowledges that industry effort to include 1800/13/1300 numbers in plan value has benefitted consumers. These “1800/13/1300-friendly” plans now make up a significant portion of new plans on the market but the CA/AMTA proposal fails to consider the number of customers on legacy plans. As many consumers are locked into two-year plans and others choose to stick with the same plan for many years, there will be a significant proportion of consumers who will not be using a 1800/13/1300 “friendly” plan and will not be for some time to come.

## **3.2 Flow on effects from interconnect pricing unfounded**

The CA/AMTA proposal has raised concerns that some businesses (the B party in the call) could see increased costs to use a 13/1300 number, resulting in businesses abandoning their service. A result where less services are offered over 13/1300 numbers is a poor result for consumers, telecommunications companies and organisations using 13/1300 numbers. However, the issue of rising costs for B-party users of 13/1300 numbers must be considered alongside of relevant telecommunications regulations.

ACCAN understands that B-party costs will need to be readjusted if Option A is implemented but the degree of any price rise to be borne by the B-party is dependent on interconnect arrangements. Currently interconnect arrangements for free and local-rate numbers are arranged individually between providers. ACCAN has encouraged the ACCC to offer support to the telecommunications industry in negotiating any interconnect changes, to avoid issues of collusion and to see a result of low interconnect rates in line with similar access charges like the Mobile Terminating Access Service (MTAS).<sup>16</sup>

There is a risk that mobile service providers could raise the origination access fees they charge FLRN carriers to extremely high levels to compensate for lost revenue, instead of basing charges on cost recovery models. This could have the effect of unfair price increases. The wholesale origination access price needs to be set at a level which is fair, transparent and reflects the cost of providing the service.

Should Option A be implemented, interconnect arrangements could *possibly* become so high that many B-party providers are priced-out of using 13/1300 numbers. However, the ACCC has the power to investigate rates and declare a wholesale access service at any time.<sup>17</sup>

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<sup>14</sup> ACMA (2013), Cutting the fine print: New information tool for telecommunications consumers [http://www.acma.gov.au/WEB/STANDARD/pc=PC\\_600174](http://www.acma.gov.au/WEB/STANDARD/pc=PC_600174)

<sup>15</sup> ACMA (2012), *Proposed variation to Numbering Plan – CA and AMTA Proposal*, p 10

<sup>16</sup> ACCC, June 2011, *Domestic Mobile Terminating Access Service (MTAS) Public Inquiry to make an Access Determination*.

<sup>17</sup> ACCC, June 2004, *Mobile Services Review Mobile Originating Access Service Final Report* p54-55.

ACCAN will be strongly encouraging the ACCC to use this power if any evidence of an access agreement being necessary arises.

Should Option A be implemented, consumers will be better off if businesses choose to keep their 13 number. There are alternatives available for businesses that are sensitive to price rises for 13 numbers, such as offering a geographic number. If businesses choose to switch from a 13 to a geographic number, consumers will be in the same financial position they are currently to contact that business.

### 3.3 Impact of Option B on government, charities and businesses using 13/1300 numbers

Option A would not only be the most positive outcome for consumers overall; Option B is likely to result in excessive costs for organisations outside the telecommunications industry.

The CA/AMTA proposal suggests that some industry members would work with government departments and agencies that receive calls via a 13/1300 number so that the departments are “encouraged, incentivised or even required to offer the option of a call-back facility at the beginning of their IVR queue” and encouraged to use 1800 numbers.<sup>18</sup>

This proposal does not actually address the problem of high rates to call 13 numbers from mobile phones. As discussed in multiple submissions to the ACMA, while the use of call-back services or other call-management tools are welcome, they cannot be considered a direct substitute for a call placed by a consumer at a time of their choosing.<sup>19</sup>

This aspect of the CA/AMTA proposal contains no implementation detail. It is unclear how an industry body would encourage, incentivise or require a government department to switch practices. Given the current political and financial climate, there may be reluctance by government to spend significant amounts on additional calling services. The proposal contains too many variables to meet the principle of certainty for consumers. Additional government expenditure on call-back services could be rolled-back in any round of funding cuts.

To get a sense of the scope of how many government departments would be effected by the proposal, ACCAN conducted an audit of government department and agencies’ use of 13/1300 numbers. At a Federal level, ACCAN identified 111 13/1300 numbers used by government departments and agencies. Looking at NSW, ACCAN identified 55 13/1300 numbers. Extrapolating this number out across all states, assuming some have more and others less than NSW, that comes to 440 13/1300 numbers in use across State and Territory government departments and agencies and 551 13/1300 numbers across all Australian governments. A full list of all numbers identified can be found in Appendix Three.

These numbers should be thought of as a conservative estimate. They were identified via government directory assistance services and it is highly likely that more numbers are used by unlisted government agencies.

This proposal to adjust government practice also fails to recognise that consumers need access to many 13/1300 numbers – not just those offered by governments. Most important among these are helpline/community sector services offered via 1300 numbers. Conducting

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<sup>18</sup> ACMA (2012), *Proposed variation to Numbering Plan – CA and AMTA* p 6.

<sup>19</sup> ACCC, June 2004, *Mobile Services Review Mobile Originating Access Service Final Report*.



a basic search for helpline services using 13/1300 numbers, ACCAN has identified 139 helplines which use 13 numbers. A full list of these numbers is available in Appendix Four. Again this should be thought of as a conservative estimate, as many smaller or state-based services may have been overlooked in this search. This list does not include essential business numbers, like financial hardship helplines offered by banks or road-side assistance numbers.

Consideration of arrangements to make 13/1300 numbers more accessible to consumers reinforces the difficulty of getting hundreds to thousands of organisations to change their practice compared to a telecommunications industry shift. ACCAN recognises that Option A presents financial and staff costs to the telecommunications industry. But when these costs are considered against the overall cost to consumers of maintaining the status quo, the cost to other organisations to accommodate a failure of the telecommunications industry to adapt to changing consumer behaviour, and the possible revenue providers stand to gain from two number ranges given a clear and revitalised purpose, it becomes apparent that changing charging arrangements is in the best interests of the majority of parties.

### 3.4 Adequacy of existing research

While ACCAN would always welcome additional research into 13/1300 numbers, it must be recognised that an established body of evidence already exists pointing to consumer detriment under current charging systems. This evidence should be considered by the ACMA in making a final decision and by any party wishing to further research this issue. With this in mind, ACCAN has included a discussion of consumer detriment resulting from the high cost of calling 13 numbers from mobile phones in Appendix Five.

The ACMA must also consider that industry have been provided with numerous, specific requests for additional material explaining FLRN arrangements and costs and have had ample opportunity to commission additional research.

### 3.5 Conclusion: The ACMA must proceed with option A for 1300 numbers

Based on all the evidence canvassed above, ACCAN strongly recommends that the ACMA proceeds with option A for 13/1300 reform by the original deadline of 1 January 2015 or, preferably, earlier.

Limiting the cost of mobile calls to 13/1300 numbers by defining the “low charge amount” according to price control arrangements in the Telstra Carrier Charges – Price Control Arrangements, Notification and Disallowance Determination No.1 of 2005 (the determination) is an effective method which has been used elsewhere in the Numbering Plan.<sup>20</sup> ACCAN supports the outcomes of this approach – having the low charge 22 cent flat rate apply to landline and mobile calls to 13 numbers provides clarity and much needed consistency for consumers.

If concrete evidence presented by industry demonstrates that the 22 cent rate was too low, ACCAN is open to discussions about raising this rate slightly through an amendment of the determination. The amount would still need to be a genuinely low cost rate and should be negotiated with industry and consumer groups. The important outcome of the ACMA

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<sup>20</sup> ACMA (2012), *Proposed variation to Numbering Plan – charges for calls to freephone and local rate numbers. Consultation paper*, p11.



approach as outlined in Option A is a consistent and clear low cost rate that will apply to all calls to 13 numbers.

**Recommendation:**

- **The ACMA varies the Numbering Plan as outlined in Option A, so that 13/1300 numbers will cost a maximum of 22 cents to call from landline and mobile phones.**

Regardless of whether option A, B or a combination of the two is chosen for implementation, the results of changes to 1800 and 13/1300 numbers will have effect on industry and consumers. The ACMA needs to account for possible unanticipated changes as a result of any action or inaction by scheduling a review of 18/13/1300 number arrangements one year after the effect of any industry or regulator-initiated changes.

**Recommendation:**

- **The ACMA conducts a review of arrangements for 18/13/1300 numbers commencing one year after any industry or regulator-initiated changes have been implemented**



# Appendix one: Product analysis

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**Research aim:** To determine how many minutes of calls a consumer could make to 13 numbers from a range of mobile plans, comparing the cost of this with the cost of these calls outside of any “included value” where applicable.

**Method:** Upon consultation with ACCAN, ACA Research selected and conducted desk research on 40 different mobile phone offers across major phone providers with the breakdowns by types and providers as below:

- 23 Prepaid Mobile Phone Plan with recharge value included (purchase cost) ranging from \$10 to \$30 per plan
- 17 Contract Mobile Phone Plan with monthly fees ranging from \$10 to \$100 per plan

Data was collected and processed for each plan as below:

- All standard details posted by the providers for those 40 plans were collected including the Recharge Value, Included Minutes, Included Value, Flag Fall, 13/1300 Rate per minute.
- Researchers calculated the “value per minute” each plan would offer by, firstly assuming that the plans would only be used to make phone calls, and then taking into account the total cost of the product by considering the factors listed above.
- Researchers calculated the number of 2 minute, 5 minute and 20 minute calls that consumers could make to 13 numbers for each of the 40 plans examined.

**Products Tested:** 40 plans were researched from different 9 providers including Optus (8 plans); Telstra (8 plans); Vodafone (10 plans); Virgin (6 plans) and various providers like Lyca, Dodo, Amayasim, Red Bull and Live Connected (8 plans). A full list is provided below.

|    |          |                            |
|----|----------|----------------------------|
| 1  | Pre Paid | Telstra Cap Encore \$30    |
| 2  | Pre Paid | Telstra Beyond Talk \$30   |
| 3  | Pre Paid | Telstra Simplicity \$20    |
| 4  | Pre Paid | Telstra Long Life \$20     |
| 5  | Pre Paid | Optus Social \$30          |
| 6  | Pre Paid | Optus \$2 Days             |
| 7  | Pre Paid | Optus Crew Cap             |
| 8  | Pre Paid | Optus Long Expiry Cap      |
| 9  | Pre Paid | Vodaphone 365 Day Recharge |
| 10 | Pre Paid | Vodaphone Prepaid Cap      |
| 11 | Pre Paid | Vodaphone Flexi Cap        |
| 12 | Pre Paid | Vodaphone All Time         |
| 13 | Pre Paid | Vodaphone International    |



|    |          |                                 |
|----|----------|---------------------------------|
| 14 | Pre Paid | Vodaphone Txt & Talk            |
| 15 | Pre Paid | Red Bull 180 Days               |
| 16 | Pre Paid | Red Bull 365 Days               |
| 17 | Pre Paid | Virgin Cap \$19                 |
| 18 | Pre Paid | Virgin Long Expiry \$15         |
| 19 | Pre Paid | Virgin Simple \$19              |
| 20 | Pre Paid | Dodo \$2 Pay as you go          |
| 21 | Pre Paid | Dodo Unlimited Starter Pack     |
| 22 | Pre Paid | Amaysim Flexi                   |
| 23 | Pre Paid | Lyca Mobile                     |
| 24 | Contract | Telstra \$30 Plan               |
| 25 | Contract | Telstra Members \$20            |
| 26 | Contract | Telstra Casual \$10             |
| 27 | Contract | Telstra Every Day Connect \$100 |
| 28 | Contract | Vodaphone \$20 Plan             |
| 29 | Contract | Vodaphone \$30 Plan             |
| 30 | Contract | Vodaphone \$35 Plan             |
| 31 | Contract | Vodaphone \$45 Plan             |
| 32 | Contract | Optus \$30 Plan                 |
| 33 | Contract | Optus \$35 Plan                 |
| 34 | Contract | Optus \$50 Plan                 |
| 35 | Contract | Optus \$80 Plan                 |
| 36 | Contract | Virgin Big Plan \$29            |
| 37 | Contract | Virgin Big Plan \$49            |
| 38 | Contract | Virgin Big Plan \$59            |
| 39 | Contract | Amaysim Flexi Plan              |
| 40 | Contract | Live connected Small plan       |

**Results:** Overall pre-paid offers provided less value for consumers than contract plans. On average for a low value of \$10 to \$30 prepaid plan, users can make 17 calls of “5 minutes” or 6 calls of “20 minutes” to 13 numbers. For the contract plan where users will pay a monthly fee ranging from \$19.90 to \$80 they can on average make 76 calls of “5 minutes” or 20 calls of “20 minutes” to 13 numbers. Note that some prepaid plans offer unlimited calls to 1300 numbers, these offers use expiry periods instead of included value like 180 days, 365 days and \$2 days. Below is a summary of the results across the two different product types.



**Examination of pre-paid plans:**

| <b>Prepaid Plan (n=19) with Recharge Value from \$10 to \$30<sup>21</sup></b> |  |  |
|---|--|--|
| <b>Variable</b>   | <b>No of "5 minutes" phone calls could be made</b> | <b>No of "20 minutes" phone call could be made</b> |
| Mean  | 17   | 6  |
| Min   | 3  | 1  |
| Max   | 52   | 34   |
| Mode  | 20   | 5  |

| <b>Prepaid Plan (n=23) actual cost per minute rates</b> |                                       |
|---|---------------------------------------|
| <b>Cost per minute (actual)</b>                         | <b>Number of plans with this rate</b> |
| Between 13-20 cents/minute                              | 8                                     |
| Between 20-29 cents/minute                              | 4                                     |
| Between 30-40 cents/minute                              | 1                                     |
| Between 70-80 cents/minute                              | 1                                     |
| Between 80-90 cents/minute                              | 1                                     |
| Over \$1 /minute  | 4                                     |
| Unlimited calls possible                                | 4                                     |

In all but a few exceptional cases, it would cost a consumer more money to make a 2 minute or longer call to a 13/1300 number than if the ACMA pursued option A, which would result in a 22 cent flat-rate for consumers to call a 13 number.

For example, the Vodaphone Prepaid Cap plan (\$10 option) offers users "\$100" worth of credit. Assuming that the plan is only used to make 13/1300 calls, the effective actual call rate is 13 cents per minute. A two-minute call using this plan actually costs the user 26 cents. A five-minute call would cost 65 cents. A twenty-minute call would cost \$2.60 (or, effectively, use up over a quarter of the total credit). A consumer using this product would be better off if the ACMA implemented option A and all 13 calls, no matter how long, were charged at a 22 cent flat rate.

Looking at another pre-paid product, the Telstra pre-paid Cap Encore plan (\$30 option) offers users "\$250" worth of included value. Assuming that the plan is only used to make 13/1300 calls, the effective actual call rate is 15 cents per minute. A two-minute call using this plan actually costs the user 30 cents. A five-minute call would cost 75 cents. A twenty-minute call would cost \$3 (or, effectively, use up a tenth of the total credit). Again, a consumer using this product would be better off if the ACMA implemented option A and all 13 calls, no matter how long, were charged at a 22 cent flat rate.

<sup>21</sup> These figures exclude plans where the actual cost per minute can't be calculated as unlimited calls can be made within certain parameters.



Some plans examined offered exceptionally poor value and consumers would be significantly better off if they were charged a flat 22 cent rate for 13 calls. For example, the Vodafone \$35 All Time product had an actual per minute rate of \$1.20. A two-minute call using this plan actually costs the user \$2.40. A five-minute call would cost \$6. A twenty-minute call would cost \$24.

There were four products where an actual rate per minute could not be calculated as, under certain parameters, the product allowed unlimited calls to 13/1300 numbers. These were:

- The Optus \$2 Days product (if used daily, an approximately \$60/month product)
- The Redbull \$199 – 180 days expiry product
- The Redbull \$365 – 365 days expiry product
- The Dodo Unlimited starter pack for \$49

These plans are all mid-to high spend products but do represent good value for consumers who use them for calls. It must be noted that all of these products use unusual charging constructs – they are the exception rather than the norm in the pre-paid calling card market.

In cases where “unlimited” calls are available to the user, it’s difficult to calculate whether a consumer would “pay more” to make 13/1300 calls as no actual per-minute rate can be identified; it all depends on how the plan is used. For example, if a caller used the Optus \$2 days product to make a two minute call to a 13/1300 number and made no other calls, texts or data usage that day, the effective rate for that call would be \$1/minute. Even if the caller used the Optus \$2 days product to make a twenty-minute call to a 13/1300 number, and made no other calls, texts or data usage that day, the effective rate would be 10 cents per minute but still \$2 total – more than a 22 cent flat rate. However, if the user made ten calls of any length to a 13 number, they would be charged \$2 under the Dollar Days charging construct, but \$2.22 if a flat rate of 22 cents applied outside of this construct. Based on this, it is fair to conclude that users of this and similar “unlimited” pre-paid calling products would still sometimes “pay less” if they were charged 22 cents outside of the plan value for a 13 call.

**Examination of post-paid plans:**

| <b>Contract Plan (n=17) with Monthly Fee from \$19.90 to \$100</b> |  |  |
|--|--|--|
| <b>Variable</b>  | <b>No of "5 minutes" phone calls could be made</b> | <b>No of "20 minutes" phone call could be made</b> |
| Mean   | 76   | 20   |
| Min  | 2  | 0  |
| Max  | 175  | 46   |
| Mode   | 41   | 11   |



| Post-paid Plan (n=17) actual cost per minute |                                |
|--|--------------------------------|
| Cost per minute (actual)                     | Number of plans with this rate |
| 10 cents/minute and under                    | 2                              |
| Between 11-20 cents/minute                   | 10                             |
| Between 21-30 cents/minute                   | 2                              |
| Between 90 cents - \$1.00 /minute            | 1                              |
| Over \$1 /minute                             | 2                              |

In general, post-paid plans offered a lower actual per minute rate for calls than pre-paid plans, with 12 of 17 products analysed delivering an actual call rate of 20 cents or less per minute.

The Vodafone \$35 and \$45 plans delivered an actual call rate of 10 and 9 cents per minute, respectively. For these two plans, the actual call rate for a two minute call to a 13/1300 number would be less than 22 cents. Any call over two-minutes would cost more than 22 cents under these plans. For all other post-paid plans, the actual call rate is set at a rate over 12 cents per minute, meaning that consumers would pay less if they were charged a 22 cent flat rate for a two minute (or longer) 13/1300 call than if they were charged within the plan value.

For example, the Optus \$80 plan gives users “\$850” of “included value”. When broken down, presuming that the user only uses a plan to make calls to 13/1300 numbers, the actual call rate a user gets for \$80 is 12 cents per minute. Under this construct, a two-minute call to a 13/1300 number costs 24 cents. A five-minute call costs 60 cents. A twenty-minute call costs \$2.40.

Most plans examined had an actual cost per minute rate between 11-20 cents/minute but some plans offered very poor value for money for making 13 calls. For example, the Telstra \$30 plan gives a straight \$30 worth of value. With calls charged at 92 cents/minute with a 27 cent flagfall, a two-minute call to a 13 number costs \$2.11. A five-minute call costs \$4.82. A twenty-minute call costs \$18.62. In all cases, a consumer using this plan would be significantly better off if the ACMA proposal was implemented.



## Appendix two: Product testing

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**Research aim:** To determine how many minutes of calls a consumer could make to 13 numbers in a “typical use” situation using pre-paid mobile products.

**Method:** Five low-to-mid range pre-paid plans were purchased and the credit was exhausted by only calling 13 numbers. Users made calls for their own purposes – calling government numbers, charities and businesses. Call length was determined by how long the tester needed to complete a task such as checking their bank balance, reporting to Centrelink or getting information from a charity. This method was chosen to provide a sense of how callers would use their phone to make typical calls to 13 numbers. All products were tested in January 2013.

**Products Tested:** The 5 pre-paid plans selected for testing were:

- Telstra Cap Encore (Recharge value \$30)
- Optus Long Expiry Cap (Recharge value \$30)
- Vodafone Txt & Talk (Recharge value \$20)
- Virgin Simple (Recharge value \$19)
- Amaysim Pay As You Go (Recharge value \$19.90)

**Results:** Overall the number of calls/minutes and cost per minute that consumers received from the products tested (from exhausting the credit) are in line with what the providers advertised online. The overall average cost per minute for the five tested plans ranged from 16 to 91 cents per minute.

Results for each card test were as follows:

| <b>ID 8 - OPTUS-<br/>Long Expiry Cap<br/>\$30</b> | <b>Call 1</b>   | <b>Call 2</b> | <b>Call 3</b> | <b>Call 4</b> | <b>Call 5</b> | <b>Call 6</b> |
|---|---|---------------|---------------|---------------|---------------|---------------|
| Date  | 14-Jan  | 14-Jan        | 14-Jan        |               |               |               |
| Start time calling                                | 16:17   | 17:16         | 17:45         |               |               |               |
| End time calling                                  | 16:56   | 17:23         | 17:50         |               |               |               |
| Length of the phone call                          | 39  | 7             | 5             |               |               |               |
| <b>Opening balance (\$)</b>                       | <b>30/or 50 "included value" (plus 100 mins Optus to Optus)</b> |               |               |               |               |               |
| <b>Total Actual minutes</b>                       | <b>51.00</b>  |               |               |               |               |               |
| <b>Cost for all calls</b>                         | <b>\$30.00</b>  |               |               |               |               |               |
| <b>Cost under ACMA proposal</b>                   | <b>\$0.66</b>   |               |               |               |               |               |
| <b>Difference between current and ACMA cost</b>   | <b>\$29.34</b>  |               |               |               |               |               |



| <b>ID 15 -<br/>VODAPHONE -<br/>TXT &amp; TALK (\$20)</b> | <b>Call 1</b>  | <b>Call 2</b> | <b>Call 3</b> | <b>Call 4</b> | <b>Call 5</b> | <b>Call 6</b> |
|--|----------------|---------------|---------------|---------------|---------------|---------------|
| Date   | 15-Jan         | 15-Jan        | 15-Jan        |               |               |               |
| Start time calling                                       | 11:48          | 12:19         | 17:09         |               |               |               |
| End time calling   | 11:57          | 12:25         | 17:29         |               |               |               |
| Length of the phone call                                 | 9              | 6             | 20            |               |               |               |
| <b>Opening balance (\$)</b>                              | <b>20</b>      |               |               |               |               |               |
| <b>Total Actual minutes</b>                              | <b>35.00</b>   |               |               |               |               |               |
| <b>Cost for all calls</b>                                | <b>\$20.00</b> |               |               |               |               |               |
| <b>Cost under ACMA proposal</b>                          | <b>\$0.66</b>  |               |               |               |               |               |
| <b>Difference between current and ACMA cost</b>          | <b>\$19.34</b> |               |               |               |               |               |

| <b>ID 1 - TELSTRA<br/>Cap Encore \$30</b>       | <b>Call 1</b>                     | <b>Call 2</b> | <b>Call 3</b> | <b>Call 4</b> | <b>Call 5</b> | <b>Call 6</b> |
|---|-----------------------------------|---------------|---------------|---------------|---------------|---------------|
| Date  | 15-Jan                            | 15-Jan        | 15-Jan        | 16-Jan        | 16-Jan        |               |
| Start time calling                              | 16:14                             | 17:41         | 17:53         | 12:18         | 14:09         |               |
| End time calling                                | 17:09                             | 17:44         | 17:58         | 14:05         | 15:55         |               |
| Length of the phone call                        | 54                                | 3             | 5             | 106           | 106           |               |
| <b>Opening balance (\$)</b>                     | <b>30/"included value" of 250</b> |               |               |               |               |               |
| <b>Total Actual minutes</b>                     | <b>274.00</b>                     |               |               |               |               |               |
| <b>Cost for all calls</b>                       | <b>\$30.00</b>                    |               |               |               |               |               |
| <b>Cost under ACMA proposal</b>                 | <b>\$1.10</b>                     |               |               |               |               |               |
| <b>Difference between current and ACMA cost</b> | <b>\$28.90</b>                    |               |               |               |               |               |



| <b>ID 23 - AMAYSIM - Flexi</b>                  | <b>Call 1</b>  | <b>Call 2</b> | <b>Call 3</b> | <b>Call 4</b> | <b>Call 5</b> | <b>Call 6</b> |
|---|----------------|---------------|---------------|---------------|---------------|---------------|
| Date  | 16-Jan         | 16-Jan        | 16-Jan        | 16-Jan        | 16-Jan        | 16-Jan        |
| Start time calling                              | 16:07          | 16:38         | 16:43         | 16:44         | 16:55         | 17:27         |
| End time calling                                | 16:37          | 16:40         | 16:43         | 16:44         | 17:23         | 17:28         |
| Length of the phone call                        | 30             | 2             | 1             | 1             | 28            | 1             |
| <b>Opening balance (\$)</b>                     | <b>19.9</b>    |               |               |               |               |               |
| <b>Total Actual minutes</b>                     | <b>63.00</b>   |               |               |               |               |               |
| <b>Cost for all calls</b>                       | <b>\$19.90</b> |               |               |               |               |               |
| <b>Cost under ACMA proposal</b>                 | <b>\$1.32</b>  |               |               |               |               |               |
| <b>Difference between current and ACMA cost</b> | <b>\$18.58</b> |               |               |               |               |               |

| <b>ID 20 - VIRGIN Simple \$19</b>               | <b>Call 1</b>  | <b>Call 2</b> | <b>Call 3</b> | <b>Call 4</b> | <b>Call 5</b> | <b>Call 6</b> |
|---|----------------|---------------|---------------|---------------|---------------|---------------|
| Date  | 21-Jan         | 21-Jan        | 21-Jan        | 21-Jan        | 21-Jan        |               |
| Start time calling                              | 12:09          | 13:56         | 14:03         | 14:12         | 14:30         |               |
| End time calling                                | 13:39          | 14:00         | 14:07         | 14:15         | 14:46         |               |
| Length of the phone call                        | 90             | 4             | 4             | 3             | 16            |               |
| <b>Opening balance (\$)</b>                     | <b>19</b>      |               |               |               |               |               |
| <b>Total Actual minutes</b>                     | <b>117.00</b>  |               |               |               |               |               |
| <b>Cost for all calls</b>                       | <b>\$19.00</b> |               |               |               |               |               |
| <b>Cost under ACMA proposal</b>                 | <b>\$1.10</b>  |               |               |               |               |               |
| <b>Difference between current and ACMA cost</b> | <b>\$17.90</b> |               |               |               |               |               |

As can be seen, there is a great deal of variation in the length of calls made when testing these products. Call length ranged from one minute to 106 minutes, with most calls lasting over five minutes. In all cases, consumers would have been significantly better off if they were charged a flat rate of 22 cents for calls to 13/1300 numbers.



# Appendix three: Government 13/1300 Numbers

To get a sense of the scope of how many government departments would be affected by the CA/AMTA proposal, ACCAN conducted an audit of government department and agencies use of 13/1300 numbers. These numbers should be thought of as a conservative estimate. They were identified via government directory assistance services and it is highly likely that more numbers are used by unlisted government agencies.

## 13/1300 numbers used by Federal Government Department/Agencies

| Number | Service offered on 13/1300 number   | Number       |
|--------|---|--------------|
| 1      | ACMA Licensing Enquiries  | 1300 850 115 |
| 2      | Administrative Appeals Tribunal   | 1300 366 700 |
| 3      | Air Services Australia  | 1300 301 120 |
| 4      | ATO Aboriginal and Torres Strait Islander Centre  | 13 10 30     |
| 5      | ATO business tax self-help  | 13 72 26     |
| 6      | ATO personal tax self-help  | 13 28 65     |
| 7      | AusIndustry Hotline   | 13 28 46     |
| 8      | Austrade Export Inquiries   | 13 28 78     |
| 9      | Australian Building Codes Board   | 1300 134 631 |
| 10     | Australian Competitor and Consumer Commission - carbon price claims hotline   | 1300 303 609 |
| 11     | Australian Competitor and Consumer Commission - Competition and Consumer information  | 1300 302 502 |
| 12     | Australian Competitor and Consumer Commission - Indigenous infoline   | 1300 303 143 |
| 13     | Australian Competitor and Consumer Commission - small business helpline   | 1300 302 021 |
| 14     | Australian Competitor and Consumer Commission (unit pricing hotline)  | 1300 746 245 |
| 15     | Australian Customs and Border Protection Service  | 1300 558 099 |
| 16     | Australian Customs and Border Protection Service (general enquiries)  | 1300 363 263 |
| 17     | Australian Education International (AEI) (National Office for Overseas Skills Recognition)/Digital Education Revolution Program/National Schools Chaplaincy Program | 1300 363 079 |



|    |   |                               |
|----|---|-------------------------------|
| 18 | Australian Electoral Commission   | 13 23 26                      |
| 19 | Australian Film Television Radio School   | 1300 131 461/130 006<br>5 281 |
| 20 | Australian Fisheries Management Authority   | 1300 723 621                  |
| 21 | Australian Hearing  | 13 17 97                      |
| 22 | Australian Human Rights Commission  | 1300 369 711                  |
| 23 | Australian JobSearch/Disability Employment Network/Vocational Rehabilitation Services/Work for the Dole | 13 62 68                      |
| 24 | Australian Maritime Safety Authority  | 1300 624 633                  |
| 25 | Australian Passport Information Service   | 13 12 32                      |
| 26 | Australian Pesticides and Veterinary Medicines Authority  | 1300 700 315                  |
| 27 | Australian Prudential Regulation Authority (APRA)   | 1300 558 849                  |
| 28 | Australian Reports and Analysis Centre  | 1300 021 037                  |
| 29 | Australian Securities and Investments Commission Infoline   | 1300 300 630                  |
| 30 | Australian Skills Quality Authority   | 1300 701 801                  |
| 31 | Australian Sports Anti-Doping Authority Hotline   | 130 002 7232                  |
| 32 | Australian Volunteer Search   | 1300 650 925                  |
| 33 | Breastscreen Australia  | 13 20 50                      |
| 34 | Bureau of Infrastructure, Transport and Regional Economics  | 1300 732 749                  |
| 35 | Bureau of Meteorology - weather, land and flood warning hotline   | 1300 659 218                  |
| 36 | Centrelink - Assistance for Isolated Children   | 13 23 18                      |
| 37 | Centrelink - Australian apprenticeships   | 13 36 33                      |
| 38 | Centrelink - Disability Support Pension, Mobility Allowance, Sickness allowance, Carers allowance       | 13 27 17                      |
| 39 | Centrelink - Drought assistance   | 13 23 16                      |
| 40 | Centrelink - Exceptional Circumstances Relief Help. Migrants, refugees & visitors assurance of support  | 13 28 50                      |
| 41 | Centrelink - Financial Information Service  | 13 63 57                      |

|    |   |              |
|----|---|--------------|
| 42 | Centrelink - Jobs, Education and Training (JET), Family Tax Benefit, Child Care Benefit, Parenting Payment, Double Orphan Pension, Baby Bonus, Maternity Immunisation Allowance | 13 61 50     |
| 43 | Centrelink - PBS general enquiries  | 13 22 90     |
| 44 | Centrelink – the online services support hotline  | 13 23 07     |
| 45 | Centrelink - Youth Allowance, Austudy, Pensioner Education Supplement, Low Income Health Care Card  | 13 24 90     |
| 46 | Centrelink Age Pension, pensioner concession cards, Bereavement assistance, Widow B Pension, Wife Pension, Commonwealth Seniors Health Card                                     | 13 23 00     |
| 47 | Centrelink Automated Child Support information service  | 13 11 07     |
| 48 | Centrelink debt   | 13 63 30     |
| 49 | Centrelink Multilingual Phone Service   | 13 12 02     |
| 50 | Centrelink Phone Self Service   | 13 62 40     |
| 51 | Cervical Screening Program  | 13 15 56     |
| 52 | Child Support – for general enquiries including online services   | 13 12 72     |
| 53 | Citizenship appointments and enquiries  | 13 18 80     |
| 54 | Civil Aviation Safety Authority   | 13 17 57     |
| 55 | Clean Energy Regulator  | 1300 553 542 |
| 56 | Commonwealth Ombudsman  | 1300 362 072 |
| 57 | Compliments, Complaints or Suggestions (Department of Immigration and Citizenship)  | 13 31 77     |
| 58 | ComSuper Switchboard  | 1300 000 177 |
| 59 | Consular Emergency Centre   | 1300 555 135 |
| 60 | CSIRO   | 1300 363 400 |
| 61 | Defence Housing Australia   | 13 93 42     |
| 62 | Defence Jobs  | 13 19 01     |
| 63 | Dementia Behaviour Advisory Service   | 1300 366 448 |
| 64 | Department of Climate Change and Energy Efficiency  | 1300 130 606 |
| 65 | Department of Education, Employment and Workplace Relations - Comcare   | 1300 305 916 |
| 66 | Department of Immigration and Citizenship general inquiries   | 13 18 81     |



|    |   |                    |
|----|---|--------------------|
| 67 | Department of Veterans' Affairs General Inquiries Number  | 13 32 54           |
| 68 | Do Not Call Register  | 1300 792 958       |
| 69 | Employee Entitlement Schemes  | 1300 135 040       |
| 70 | FaHSCIA national office   | 1300 653 227       |
| 71 | Fair Work Australia   | 1300 799 675       |
| 72 | Fair Work Infoline/Fair Work Ombudsman  | 13 13 94           |
| 73 | Federal Magistrates Court of Australia  | 1300 352 000       |
| 74 | General Skilled Migration enquiries   | 1300 364 613       |
| 75 | Health Care Cards   | 13 10 21           |
| 76 | Health Identifiers service  | 1300 361 457       |
| 77 | Helping People Move Into Work - Employers line  | 13 17 15           |
| 78 | Helping People Move Into Work - Income Support Recipients line  | 13 17 64           |
| 79 | Human Rights and Equal Opportunity Complaints Hotline (general enquiries)   | 1300 656 419       |
| 80 | Insolvency and Trustee Service Australia  | 1300 364 785       |
| 81 | International Services  | 13 16 73           |
| 82 | IP Australia Customer Service Centre  | 1300 651 010       |
| 83 | Medicare  | 13 20 11           |
| 84 | Migration Review Tribunal and Refugee Review Tribunal   | 1300 361 969       |
| 85 | National Archives of Australia  | 1300 886 881       |
| 86 | National Health and Medical Research Council  | 1300 064 672       |
| 87 | National Relay Service (NRS) for callers using Speech to Speech Relay (SSR)   | 1300 555 727       |
| 88 | National Relay Service (NRS) for callers who have a hearing, speech or communication impairment and for Text Telephone (TTY) or modem callers | 13 36 77           |
| 89 | Office of the Australian Information Commissioner   | 1300 363 992       |
| 90 | Office of the Migration Agents Registration Authority - information for registered agents   | 1300 660 026       |
| 91 | Personal Property Securities Register   | 1300 007 777       |
| 92 | Report income (Centrelink)  | 13 32 76 (13 EARN) |
| 93 | Royal Australian Mint   | 1300 652 020       |
| 94 | Safe Work Australia   | 1300 551 832       |



|     |   |              |
|-----|---|--------------|
| 95  | Safety, Rehabilitation and Compensation Commission  | 1300 366 979 |
| 96  | Skilling Australia hotline/Australian Apprenticeship Access Program                                 | 13 38 73     |
| 97  | SPAM Hotline  | 1300 855 180 |
| 98  | Statistics - National Information and Referral Service  | 1300 135 070 |
| 99  | Superannuation Complaints Tribunal  | 1300 884 114 |
| 100 | Tax Practitioners Board   | 1300 362 829 |
| 101 | Taxation - Business Tax Inquiries   | 13 28 66     |
| 102 | Taxation - General Administration Line  | 13 28 69     |
| 103 | Taxation - Personal Tax Info Line   | 13 28 61     |
| 104 | Telephone Smartnumbers  | 1300 793 919 |
| 105 | The Travel Doctor-TMVC  | 1300 658 844 |
| 106 | TIS National – the Translating and Interpreting Service (Department of Immigration and Citizenship) | 13 14 50     |
| 107 | Trades Recognition Australia - Australian Recognised Trade Certificates - for Australian Residents  | 1300 360 992 |
| 108 | Travel Advice - Smart Traveller   | 1300 139 281 |
| 109 | Veterans' Review Board  | 1300 550 460 |
| 110 | Visa medical assessment   | 1300 361 046 |
| 111 | Workplace Infoline  | 1300 363 264 |

### 13/1300 numbers used by NSW state department and agencies

| Number | Name   | Number       |
|--------|--|--------------|
| 1      | Ausgrid  | 13 15 35     |
| 2      | Barangaroo Delivery Authority - Construction Info Line   | 1300 966 480 |
| 3      | Consumer, Trader and Tenancy Tribunal  | 1300 135 399 |
| 4      | Courts and Tribunal Services, District Court Civil Registry/Supreme Court Registry   | 1300 679 272 |
| 5      | Courts and Tribunal Services, Office of the Sheriff - Jury Service Enquiries   | 1300 722 574 |
| 6      | Department of Community Services - DoCs Helpline   | 13 21 11     |
| 7      | Department of Finance and Services - Motor Vehicle Industry Advisory Council/ Rental Bond Board/ Home Building Advisory Council /Products Safety Commission/ Retirement Advisory Council/Fair Trading Consumer Services/Business Licensing | 13 32 20     |
| 8      | Department of Trade and Investment, Regional Infrastructure and Services   | 1300 136 888 |



|    |   |              |
|----|---|--------------|
| 9  | Department of Trade and Investment, Regional Infrastructure and Services - Energy - Toll Free Number (Minerals) | 1300 736 122 |
| 10 | Election Funding Authority of NSW Enquiries   | 1300 022 011 |
| 11 | Employment, Education & Training - Industries and Awards/NSW Industrial Relations                               | 13 16 28     |
| 12 | Essential Energy General Enquiries  | 13 23 91     |
| 13 | Forests NSW   | 1300 655 687 |
| 14 | Hardship Review Board - Debt Management   | 1300 368 710 |
| 15 | Health Professional Councils Authority  | 1300 197 177 |
| 16 | Housing and Property Group, Government Property NSW   | 1300 784 841 |
| 17 | Hunter Water Corporation - Emergency Contact (24 hours)   | 1300 657 000 |
| 18 | Hunter Water Corporation - General inquiries  | 1300 657 657 |
| 19 | Interpreter & Translation Services for Community Relations Commission   | 1300 651 500 |
| 20 | Jenolan Caves Reserve Trust - General Enquiries   | 1300 763 311 |
| 21 | Land and Property Information/Land Titles Enquiries   | 1300 052 637 |
| 22 | Land Tax Enquiries  | 1300 139 816 |
| 23 | Legal and Community Services - NSW Registry of Births, Deaths & Marriages                                       | 1300 655 236 |
| 24 | Legal and Community Services - NSW Trustee and Guardian   | 1300 364 103 |
| 25 | Legal and Community Services - LawAccess NSW  | 1300 888 529 |
| 26 | Long Service Corporation  | 13 14 41     |
| 27 | Maritime Info Line  | 13 12 56     |
| 28 | Motor Accidents Authority (Safety, Return to Work and Support Division)   | 1300 137 131 |
| 29 | NSW Electoral Commission - Election Enquiries   | 1300 135 736 |
| 30 | NSW Electoral Commission - SmartRoll Enquiries  | 1300 617 133 |
| 31 | NSW Food Authority  | 1300 552 406 |
| 32 | NSW Government Contact Centre   | 13 36 79     |
| 33 | Office of Communities, Sport and Recreation Client Service Centre   | 13 13 02     |
| 34 | Office of Environment and Heritage, Environment Protection Authority - Environment Line                         | 13 15 55     |
| 35 | Office of Environment and Heritage, National Parks and Wildlife Service - National Parks Info Centre            | 1300 361 967 |
| 36 | NSW Poisons Information Centre  | 13 11 26     |
| 37 | Police Assistance Line (PAL)  | 13 14 44     |
| 38 | Policy and Legal Division - Office of the Professional Standards Councils                                       | 1300 555 772 |
| 39 | Public Housing Enquiries  | 1300 468 746 |
| 40 | RailCorp  | 1300 038 500 |
| 41 | Roads and Maritime Services – general line  | 13 17 82     |
| 42 | Roads and Traffic Customer Service Centre   | 13 22 13     |
| 43 | Seniors Information Service   | 13 12 44     |
| 44 | Small Business Commissioner   | 1300 795 534 |
| 45 | State Emergency Service - For Emergency Help in Floods and Storms   | 13 25 00     |
| 46 | State Water Corporation   | 1300 662 077 |



|    |   |              |
|----|---|--------------|
| 47 | Sydney Catchment Authority  | 1300 722 468 |
| 48 | Sydney Harbour Foreshore Authority - Cooks Cove Development Corporation                         | 1300 655 995 |
| 49 | Sydney Water Corporation - Line for reporting faults and leaks on Sydney Water (24 hours) mains | 13 20 90     |
| 50 | Sydney Water Corporation Account and General Enquiries  | 13 20 92     |
| 51 | TAFE Information Centre   | 13 16 01     |
| 52 | Teaching Housing Authority  | 1300 137 343 |
| 53 | Transport Infoline  | 13 15 00     |
| 54 | Transport Management Centre   | 13 17 00     |
| 55 | WorkCover Authority of NSW  | 13 10 50     |

## Appendix Four: Helplines with 13/1300 numbers

| <b>Name<sup>22</sup></b>                                     | <b>Number</b> | <b>Run by</b>                                    |
|--|---------------|--|
| Mental Health Assessment and Crisis Intervention Service     | 13 14 65      | South Australian Health Triage                   |
| Top End Mental Health Service                                | 13 14 65      | NT - rural and remote                            |
| National Crisis Support                                      | 13 43 25 84   | Queensland Health                                |
| 13 HEALTH - practical health information and advice          | 13 432584     | QLD Government                                   |
| Business InfoLine - for small business                       | 1300 098 631  | Consumer Affairs Victoria                        |
| Parentline NSW   | 1300 130 052  | Parentline, Catholic Care                        |
| Queensland Advocacy Inc                                      | 1300 130 582  | Queensland Advocacy Inc                          |
| Employment Law Centre of WA Advice Line                      | 1300 130 956  | Employment Law Centre of WA                      |
| Needle clean up hotline/Alcohol and Drug Information Service | 1300 131 340  | Drug and Alcohol Services SA                     |
| Youth Healthline   | 1300 131 719  | Children, Youth and Women's Health Service SA    |
| Women's Information and Referral Exchange (WIRE)             | 1300 134 130  | Women's Information and Referral Exchange (WIRE) |
| Adverse medicine effects line                                | 1300 134 237  | NPS - National Prescribing Service               |
| Legal Information Line                                       | 1300 136 921  | Youth and Enterprise Legal Centre (YELC)         |
| Housing Direct (Tenant Repairs & Maintenance)                | 1300 137 677  | Department of Housing WA                         |
| Goldfields Community Legal Centre Outreach Clients Line      | 1300 139 188  | Goldfields Community Legal Centre                |
| Pregnancy Helpline   | 1300 139 313  | Department for Families and Communities SA       |
| Beyondblue Information Line                                  | 1300 224 636  | Crisis Support Services                          |
| Karitane Careline  | 1300 227 464  | Karitane   |
| Al-anon Family Alcohol Support                               | 1300 252 666  | Al-Anon Family Groups Australia                  |
| Grief Counselling  | 1300 266 643  | Bonnie Babes Foundation                          |
| 1300 BORN EARLY  | 1300 267 632  | Austprem   |
| Cerebral Palsy Support Network (CPSN)                        | 1300 277 600  | Cerebral Palsy Support Network (CPSN)            |
| Angel Babies Counselling                                     | 1300 283 238  | Angel Babies Foundation                          |
| Parent line  | 1300 301 300  | QLD and NT Parentline                            |
| Consumer Protection Advice Line                              | 1300 304 054  | Department of Commerce WA                        |
| Disability Information                                       | 1300 305 558  | Disability Information and Resource Centre SA    |
| Diabetes Australia Infoline                                  | 1300 342 238  | Australian Diabetes Council                      |
| Eastern Region Child Protection                              | 1300 360 391  | Department of Human Services VIC                 |
| Commonwealth Ombudsman                                       | 1300 362 072  | Commonwealth Ombudsman                           |
| Overseas Students Ombudsman Helpline                         | 1300 362 072  | Overseas Students Ombudsman                      |

<sup>22</sup> Note: as some helplines are operated by Federal or State governments, there is a limited number of overlap between the numbers listed in Appendix three and Appendix four.



|  |              |  |
|--|--------------|--|
| Heart Health Information                                   | 1300 362 787 | Heart Foundation   |
| Workplace Infoline:  | 1300 363 264 | Workplace Authority  |
| Salvo Care Line  | 1300 363 622 | Salvation Army   |
| Elizabeth Evatt Community Legal Centre                     | 1300 363 967 | Elizabeth Evatt Community Legal Centre                       |
| Parentline SA  | 1300 364 100 | Children, Youth and Women's Health Service SA                |
| Relationships Australia Helpline                           | 1300 364 277 | Relationships Australia                                      |
| Lifelink Samaritans Tasmania                               | 1300 364 566 | Lifelink Samaritans Tasmania                                 |
| Disability Advocacy NSW                                    | 1300 365 085 | Disability Advocacy NSW                                      |
| Rooming House Hotline                                      | 1300 365 814 | Consumer Affairs Victoria                                    |
| Legal Helpline   | 1300 366 424 | Legal Services Commission South Australia                    |
| Telephone Advice Service, Legal Aid Commission of Tasmania | 1300 366 611 | Legal Aid Commission of Tasmania                             |
| Family drug support line                                   | 1300 368 186 | Family drug support  |
| Seniors Rights Victoria                                    | 1300 368 821 | Seniors Rights Victoria                                      |
| South East Community Legal Service Inc                     | 1300 369 236 | South East Community Legal Service Inc                       |
| Environmental Defenders Office [Northern Rivers]           | 1300 369 791 | Environmental Defenders Office [Northern Rivers]             |
| Lifeline Far North Queensland                              | 1300 370 255 | Lifeline Far North Queensland                                |
| Epilepsy assistance  | 1300 374 537 | Epilepsy Action Australia                                    |
| Barwon Community Legal Service Inc                         | 1300 430 599 | Barwon Community Legal Service Inc VIC                       |
| Elizabeth Mission Anglicare SA                             | 1300 467 372 | Anglicare SA   |
| Employment Law Centre of Western Australia Inc             | 1300 520 054 | Employment Law Centre of Western Australia Inc               |
| Post Care Support Statewide Information and Referral Line  | 1300 532 846 | Melbourne Citymission  |
| Eating Disorders Helpline                                  | 1300 550 236 | Eating Disorders Foundation of Victoria                      |
| Mental Health Emergency Response Line                      | 1300 555 788 | Government of Western Australia Mental Health Commission     |
| Building Advice and Conciliation Victoria (BACV)           | 1300 557 559 | Consumer Affairs Victoria                                    |
| Consumer Affairs Victoria Helpline                         | 1300 558 181 | Consumer Affairs Victoria                                    |
| Northern Community Legal Service Inc                       | 1300 558 555 | Northern Community Legal Service Inc                         |
| Down Syndrome Tasmania                                     | 1300 592 050 | Down Syndrome Tasmania                                       |
| Nurse on Call  | 1300 606 024 | VIC Department of Education and Early childhood Development  |
| 1300 MBABIES   | 1300 622 243 | Miricle babies Foundation                                    |
| Medicines Line   | 1300 633 424 | NPS - National Prescribing Service                           |
| Indigenous information line                                | 1300 650 143 | QLD Legal Aid  |
| Legal Aid WA Infoline                                      | 1300 650 579 | Legal Aid WA   |
| Elder Abuse Prevention Unit Helpline                       | 1300 651 192 | Elder Abuse Prevention Unit Helpline-Brisbane Lifeline (QLD) |
| SuicideLine (VIC)  | 1300 651 251 | Crisis Support Services                                      |
| Drug and Alcohol Youth Service WA                          | 1300 651 329 | Drug and Alcohol Youth Service WA                            |
| Tenants Unions of Tasmania advice line                     | 1300 652 641 | Tenants Unions of Tasmania                                   |
| Legal Aid Helpline   | 1300 654 314 | Legal Aid ACT  |



|  |              |   |
|--|--------------|---|
| Birthline  | 1300 655 156 | Birthline pregnancy support services inc                                    |
| Labour Relations Wageline:   | 1300 655 266 | Department of Commerce WA   |
| Southern Metropolitan Region Child Protection                                | 1300 655 795 | Department of Human Services VIC  |
| The Samaritans NSW   | 1300 656 336 | The Samaritans  |
| Federal Human Rights and Equal Opportunity Commission                        | 1300 656 419 | Federal Human Rights and Equal Opportunity Commission                       |
| Drug Arm assistance  | 1300 656 800 | Drug Awareness, rehabilitation and management                               |
| Advocates for Survivors of Child Abuse (SA)                                  | 1300 657 380 | ASCA - Adults surviving child abuse   |
| Family planning helpline   | 1300 658 886 | Family planning NSW   |
| Suicide Call Back Service  | 1300 659 467 | Crisis Support Services   |
| Family drughelp  | 1300 660 068 | Family drughelp   |
| Pathways Counselling Services  | 1300 660 640 | Baptistcare WA  |
| Indigenous Consumers Unit  | 1300 661 511 | Consumer Affairs Victoria   |
| Uniting Care West Accommodation Services                                     | 1300 663 298 | Uniting Care West   |
| Insurance Law Service  | 1300 663 464 | Consumer Credit Legal Centre NSW  |
| North and West Region Child Protection                                       | 1300 664 977 | Department of Human Services VIC  |
| Criminal Justice Support Network/ Intellectual Disability Rights Service Inc | 1300 665 908 | Criminal Justice Support Network/Intellectual Disability Rights Service Inc |
| Privacy Victoria   | 1300 666 444 | Privacy Victoria  |
| 1300 MYPREMMIE 24 hour support   | 1300 697 736 | Lifes little treasures foundation   |
| National Council for Single Mothers and their Children Helpline              | 1300 725 470 | National Council for Single Mothers and their Children                      |
| Post and Antenatal Depression Helpline                                       | 1300 726 306 | PANDA-Post and Antenatal Depression Association                             |
| St Vincent De Pauls SA   | 1300 729 202 | St Vincent De Pauls   |
| Estate Agents Resolution Service (EARS)                                      | 1300 737 030 | Consumer Affairs Victoria   |
| Child Protection Advice and Referral Service                                 | 1300 737 639 | Child Protection Advice and Referral Service TAS                            |
| Pregnancy Counselling Australia  | 1300 737 732 | Pregnancy Counselling Australia   |
| Tenants' Advice line, Tenants' Union QLD                                     | 1300 744 263 | Tenants' Union of QLD   |
| Remote Area Financial Counselling  | 1300 759 655 | Somerville NT   |
| 1300 PREM BABY   | 1300 773 622 | National Premmie Foundation   |
| Financial Ombudsman Service  | 1300 780 808 | Financial Ombudsman Service   |
| Domestic Violence Crisis Service   | 1300 782 200 | Department for Families and Communities SA                                  |
| Riverland Community Legal Service Inc  | 1300 788 576 | Riverland Community Legal Service Inc                                       |
| MensLine Australia   | 1300 789 978 | Crisis Support Services   |
| Mental Health Information Service Line                                       | 1300 794 991 | Mental Health Information Service NSW                                       |
| Anxiety Disorders Information Line:  | 1300 794 992 | Mental Health Information Service NSW                                       |
| Eastern Community Legal Centre - Outer East Branch                           | 1300 797 088 | Eastern Community Legal Centre - Outer East Branch                          |
| Parentline TAS   | 1300 808 178 | Parentline TAS  |
| Vision Australia   | 1300 847 466 | Vision Australia  |



|  |              |   |
|--|--------------|---|
| Southern Community Justice Centre (Marion regional office)   | 1300 850 650 | Southern Community Justice Centre (Marion regional office)  |
| Dads in distress support service                             | 1300 853 437 | DID - Dads in distress                                      |
| Telephone Advisory Service, Office of the Public Advocate WA | 1300 858 455 | Office of the Public Advocate WA                            |
| Drug information   | 1300 858 584 | The drug prevention network                                 |
| Housing and homelessness services                            | 1300 880 882 | Queensland Department of Communities                        |
| Legal Advice   | 1300 881 020 | Consumer Action Law Centre VIC                              |
| Victorian Office of the Workplace Rights Advocate            | 1300 882 648 | Victorian Office of the Workplace Rights Advocate           |
| Disability Discrimination Legal Service Inc (Victoria)       | 1300 882 872 | Disability Discrimination Legal Service Inc (Victoria)      |
| WHS Healthline   | 1300 882 880 | Women's Health Statewide SA                                 |
| Superannuation Complaints Tribunal                           | 1300 884 114 | Superannuation Complaints Tribunal                          |
| Assistive Equipment and Technology services                  | 1300 885 886 | Independent living centre WA                                |
| Children's and Youth/Disability Discrimination Legal Service | 1300 886 220 | Central Community Legal Service SA                          |
| Australian Multiple Birth Society                            | 1300 886 499 | Australian Multiple Birth Society                           |
| LawAccess NSW  | 1300 888 529 | LawAccess NSW   |
| Autism Advisor Program                                       | 1300 978 611 | Autism Spectrum Australia                                   |
| Lifeline Darling Downs & South West Queensland Services      | 1300 991 443 | Lifeline Darling Downs & South West Queensland              |
| 24 Hour Consular Emergency Centre (within Australia)         | 1300 555 135 | Department of Foreign Affairs and Trade                     |
| Indigenous information line                                  | 1300 650 143 | Legal Aid Queensland  |
| Legal information and referrals                              | 1300 651 188 | Legal Aid Queensland  |
| Fair Work Australia Help Line                                | 1300 799 675 | Fair Work Australia   |
| Lifeline Australia   | 131 114      | Lifeline Australia  |
| Cancer Council hotline                                       | 131 120      | Cancer Council  |
| Poisons information  | 131 126      | Referred to different department in each state              |
| Small Business Advocacy Service                              | 131 249      | Small Business Advocacy Service WA                          |
| Child Protection After Hours Emergency Service               | 131 278      | Department of Human Services VIC                            |
| Child Abuse Report Line                                      | 131 478      | Child Abuse Report Line - SA                                |
| Breast screen  | 132 050      | Referred to different organisation in each state            |
| DOCS Child Protection Helpline                               | 132 111      | DOCS NSW  |
| Maternal and Child Health Line                               | 132 229      | VIC Department of Education and Early childhood Development |
| Parentline VIC   | 132 289      | Parent line VIC   |
| Financial Information Service                                | 132 300      | Centrelink  |
| State Emergency Service                                      | 132 500      | State Governments   |
| Family Assistance Office                                     | 136 150      | Australian Government                                       |
| 13 Salvos  | 137 258      | Salvation Army  |
| Quitline   | 137 848      | Quitline  |

# Appendix Five: Existing research for 13/1300 numbers

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As a reminder of the detriment already experienced by consumers who have faced high calls to 13 numbers from mobile phones, ACCAN presents a short discussion of difficulties faced by consumers in crisis after experiencing a natural disaster.

## **A snapshot of detriment: consumers in crisis after natural disasters**

A call to an insurance company is just one of many 13 calls a consumer will have to make after living through a natural disaster. Other calls that may need to be placed to 13 numbers include calls to State Emergency Services, calls to financial institutions, charities for assistance, or mental health helplines. After a natural disaster, consumers are less likely to have access to their landline in their own home and more likely to have to place calls by mobile phone.

Many companies that provide personal home insurance only allow initial claims and enquiries to be made over the phone or online. In order to make a home insurance claim a consumer either has to have access to a computer to complete an online form or call in. The majority of insurance companies provide 13 numbers for people to make claims.

**Table: Personal home insurance claim numbers, a selection from major insurance companies**

| <b>Organisation</b> | <b>Claim reporting number</b> |
|---------------------|-------------------------------|
| Allianz             | 131 000                       |
| GIO                 | 131 436                       |
| CGU                 | 1300 886 022                  |
| QBE                 | 133 723                       |
| APIA                | 135 050                       |
| NRMA Insurance      | 131 123                       |
| Youi                | 1300 009 684                  |
| Budget Direct       | 1300 139 591                  |
| Real insurance      | 131 948                       |
| AAMI                | 132 244                       |

*Source: company websites.*

Calls to insurance claim lines take time. When natural disasters occur there are many people calling claim lines with the potential for call wait times to extend.



Calls to insurance companies can add up to a significant portion of a customer's credit or result in large bills. The image in box one is taken from a consumer bill provided to ACCAN. The consumer had to contact GIO insurance from her mobile phone to claim for a car accident. A 51 minute call cost \$41.17.

**Box one: cost of calling insurance claim numbers from a mobile phone.**

|        |         |             |                |          |       |            |          |
|--------|---------|-------------|----------------|----------|-------|------------|----------|
| 23 Apr | 03:41pm | Campsie     | 041 [REDACTED] | Off Peak | 00:34 |            | \$1.170  |
| 28 Apr | 01:49pm | Campsie     | 029 [REDACTED] | Peak     | 03:21 |            | \$3.570  |
| 28 Apr | 01:54pm | Earlwood    | 041 [REDACTED] | Peak     | 00:26 | Called GIO | \$1.170  |
| 28 Apr | 01:54pm | Campsie     | 029 [REDACTED] | Peak     | 04:28 |            | \$4.370  |
| 28 Apr | 02:15pm | Campsie     | 029 [REDACTED] | Peak     | 00:25 | due to car | \$1.170  |
| 29 Apr | 05:10pm | Tempe       | 029 [REDACTED] | Peak     | 01:27 | accident.  | \$1.970  |
| 29 Apr | 05:13pm | Tempe       | 131446         | Peak     | 51:00 |            | \$41.170 |
| 29 Apr | 06:32pm | St Peters   | 041 [REDACTED] | Peak     | 00:55 |            | \$1.170  |
| 29 Apr | 06:34pm | St Peters   | 041 [REDACTED] | Peak     | 00:22 |            | \$1.170  |
| 29 Apr | 06:35pm | St Peters   | 041 [REDACTED] | Peak     | 01:02 |            | \$1.970  |
| 29 Apr | 06:50pm | Mascot      | 041 [REDACTED] | Peak     | 00:27 |            | \$1.170  |
| 29 Apr | 08:03pm | IntlAirport | 041 [REDACTED] | Off Peak | 02:27 |            | \$2.770  |
| 01 May | 11:55am | Earlwood    | 041 [REDACTED] | Off Peak | 01:06 |            | \$1.970  |
| 02 May | 10:02am | Kingsford   | 029 [REDACTED] | Peak     | 01:03 |            | \$1.970  |

ACCAN has received case studies from community sector organisations, detailing situations where consumers have been placed on hold and paid significant amounts to contact their insurance company by mobile phone after a natural disaster. ACCAN refers the ACMA to ACCAN's submission to the House of Representatives Standing Committee on Social Policy and Legal Affairs *Inquiry into the operation of the insurance industry during disaster events* for further detail.<sup>23</sup>

Parties looking for further research on 13/1300 numbers and consumer detriment should refer to ACCAN submissions on the matter from 2010-2012 available at [www.accan.org.au](http://www.accan.org.au)

<sup>23</sup> [http://accan.org.au/index.php?option=com\\_content&view=article&id=355:inquiry-insurance-industry&catid=141:phones&Itemid=174](http://accan.org.au/index.php?option=com_content&view=article&id=355:inquiry-insurance-industry&catid=141:phones&Itemid=174)