



# The Cost of a Free Call: Accessing 1800 and 13/1300 services from mobile phones

ACCAN, AFCCRA and ACOSS Super-complaint to the  
Australian Communications and Media Authority

10 September 2010

**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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**About AFCCRA**

The Australian Financial Counselling and Credit Reform Association (AFCCRA) is the peak body for financial counsellors in Australia. Financial counsellors assist people in financial difficulty by providing information, support and advocacy. The aim is to help people regain control of their financial situation. Financial counsellors work in community organisations, community legal services and in some government agencies. Their services are free, confidential and without conflict of interest.

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**About ACOSS**

The Australian Council of Social Service (ACOSS) is the peak council of the community and social services sector. We are the national voice for the needs of people affected by poverty and inequality. ACOSS develops and promotes socially, economically and environmentally responsible public policy and action by government, community and business. Operating for over 50 years, ACOSS supports non-government organisations that help low income and disadvantaged Australians. Through our network of National Members, ACOSS links community and welfare services in every corner of Australia

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# 1. Executive Summary

1800 telephone numbers provide an important public service. They allow the receiver to pay for incoming calls, as opposed to the standard default practice of the caller paying for their outgoing calls. These services are known as ‘freephone’ services. Since the inception of these numbers in the *Telecommunications Numbering Plan 1997* more than a decade ago countless vital public services have taken up the option of removing a financial barrier to connecting with people. However, a major pitfall of the scheme is its limited application to ‘standard telephone services’. As a consequence, people using 1800 services from mobile telephones do not get free access to 1800 services. Our research has found that customers can face material disadvantage in using (or being unable to adequately use) freephone services.

Similarly, 13 and 1300 numbers have been widely adopted by government and industry to provide consumers with access to a nation-wide number at the cost of a local call. These services are known as ‘local rate’ services. Local rate services are designed to promote business efficiencies (operating and promoting a single telephone number) and maintain equality in access to service across the Australian population (paying local, untimed call rates instead of STD timed charges). Unfortunately this service suffers the same failing as 1800 numbers because its regulatory framework limits its application to ‘standard telephone service’. This means 13 and 1300 numbers are not subject to local, untimed call rates when dialled from mobile telephones. We believe this exacerbates consumer confusion in the market place because of unpredictable pricing.

ACCAN, AFCCRA and ACOSS are concerned about the call costs consumers are charged when calling 1800 and 13 numbers from their mobile telephones. We are therefore submitting a super-complaint calling for the Australian Communications and Media Authority (ACMA) to investigate this issue. This super-complaint explains why an investigation is warranted and canvasses potential solutions.

We believe there is a strong equity and efficiency case for charges for calls from mobile phones to 1800 and 13 numbers phones to match the charges when calling from landlines.

We believe that there are potentially several solutions to the problem.

**Regulatory Reform:** The Numbering Plan could expand its definition of freephone and local rate service to include mobile telecommunication services.

**Industry-led:** Telecommunications companies could change their billing processes so that calls from mobiles to essential and important organisations using 1800 and 13 numbers are charged at the same rate as calls made to those numbers from landlines.

**Technological:** A new number range could be created exclusively for calls from mobiles to essential and important services which currently use 1800 and 13 numbers.

## 2. Background

### 2.1 Regulation of ‘freephone’ and ‘local rate’ services

The *Telecommunications Numbering Plan 1997* (the Numbering Plan) regulates charges to 1800 and 13/1300 service. Specifically, Schedule 4A of the Numbering Plan lists the telephone number prefixes that are designated ‘freephone’ services, while Schedule 4B identifies the range of telephone prefixes that are designated ‘local rate’ services.

The Numbering Plan defines ‘freephone’ services as follows;

**freephone service** means a carriage service in which:

- (a) a customer issued with a number is charged for calls to the number for the service; and
- (b) the call charge for calls made to the number for the service from a standard telephone service (other than a location independent communications service or a public mobile telecommunications service) is zero.

And defines a ‘local rate service’ as follows;

**local rate service** means a carriage service:

- (a) that is capable of voice telephony; and
- (b) that, for a call, involves the translation of the number dialled in making the call to a number that identifies a point of termination for the call; and
- (c) that is not a local service; and
- (d) for which:
  - (i) the call charge for calls made using a standard telephone service (other than a location independent communications service or a public mobile telecommunications service) is equal to, or less than, the call charge for local calls; and
  - (ii) responsibility for the residual charge for calls (if any) lies with the person to whom the number is issued.

In both instances, the Numbering Plan specifically regulates call costs for standard telephone services only. The standard telephone service is defined in the *Telecommunications (Consumer Protection and Service Standards) Act 1999* and is limited to landline services providing any-to-any connectivity. In other words, mobile telephone services are specifically excluded.

### 2.2 Uptake of ‘freephone’ and ‘local rate’ services

Freephone and local rate services make up a large majority of contact numbers for essential and important services, including government, utility, public transport, dispute resolution, and consumer/legal support. They include:

- **Government social services:** Centrelink – 1800 and 13 contact numbers, Veteran’s Affairs - 1800 and 13 contact numbers, Medicare - 1800 and 13 contact numbers, Australian Tax Office – 13 contact numbers

- **National Dispute Resolution Services:** Telecommunications Industry Ombudsman – 1800 contact number, Financial Ombudsman Service – 1300 contact number, Credit Ombudsman Service Limited - 1800 contact number
- **Lifeline:** 13 contact number
- **Consumer protection agencies:** 6 of 8 state and territory consumer protection agencies have 1800/13 contact numbers
- **Energy providers:** 5 of 6 major energy providers have 1800/13 contact numbers AGL, Energy Australia, Origin Energy, Integral, Jemena – Transgrid does not
- **Water utilities:** 8 of 8 capital city water utilities have 1800/13 contact numbers. Sydney Water, Melbourne Water, Queensland Water Commission, SA Water, Water Corporation (WA), Southern Water (Tas), Power Water (NT), ActewAGL (ACT)
- **Community Legal Centres:**  
18 of 37 Community legal centres in NSW have 1800/13 contact numbers; 19 of 51 community legal centres in VIC have 1800/13 contact numbers
- **Public transport information:**  
7 of 8 capital city public transport information lines have 1800/13 contact numbers. Transport Infoline - NSW, Metlink – VIC, Adelaide Metro, Translink (Qld), Transperth (WA), Metro Tasmania, ACTION (ACT)
- **Yellow pages listings for “important numbers”:**  
In the Yellow pages CBD & East (Sydney), 7 in 10 numbers listed in the Emergency and Important Numbers are 1800 or 13 contact numbers. In the Yellow Pages Sydney, 3 in 4 numbers listed in the Emergency and Important Numbers are 1800 or 13 contact numbers.

### **2.3 Consumer use of ‘freephone’ and ‘local rate’ services**

These important and essential services are used by all Australians. Vulnerable Australians, such as those on low-incomes, those in rural areas and young people, are likely to be overrepresented in accessing some of these services.

Vulnerable disadvantaged consumers have high rates of mobile phone ownership including where the mobile is the sole communication device – further detail below. Thus vulnerable Australians are likely to call important and essential services from their mobiles and so particularly suffer the burden of high call rates.

According to the ACMA’s *Communications Report 2008-09* the mobile phone penetration rate has reached 110 per cent of the Australian population (with 24.22 million mobile services), while fixed-line services have dropped to 10.67 million.<sup>1</sup> Within the population ownership of mobile phones is very common among people on low-income. The Department of Broadband,

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<sup>1</sup> ACMA, *Communications Report 2008-09*, p49.

Communications and the Digital Economy (DBCDE) reports that 80% of people who have an annual income of under \$10,000 own mobile phones.<sup>2</sup>

Many low-income vulnerable consumers rely on their mobile phone as their primary, if not sole, phone connection. The 2006 Low Income Measures Assessment Committee's (LIMAC) report concluded that mobile phones and Internet are becoming a service of choice and/or need for people on low incomes. It quotes the Smith Family:

“When offering an ICT package of a computer, Internet access and training to “Learning for Life” families, who are on a low income, we often find that they do not have a landline, but rely on mobile phones and are not able to take up the offer.”<sup>3</sup>

The research article *Indigenous Adoption of Mobile Phones and Oral Culture* investigates the use of mobile phones by an Indigenous group on a remote island in the Torres Strait. It states that:

“...ethnographic research and our three interviews indicate a very high rate of mobile phone adoption: “nearly everyone” has a mobile, in the words of one of our respondents.”<sup>4</sup>

With high level ownership of mobile phones by low-income Australians, the current differential pricing for calls made from a mobile to freephone and local rate services raises serious social equity concerns. It is not right that the most vulnerable Australians should pay the most for accessing essential and important services.

## **2.4 Requesting call-backs on freephone and local rate services**

Calls to 1800 and 13 numbers can incur high charges. We have seen consumer mobile phone bills where an eight minute call to a legal aid service's 13 contact number costs \$6.04. This is 20 times the cost of the call if it were made from a landline, presuming the 13 call costs an average 30 cents. Similarly, a five minute call to a local council's 13 number costs \$3.68. This is 12 times the cost of the call if it were made from a landline, presuming again that the 13 number costs an average 30 cents.

Because of the high call costs, some consumers choose to seek call-back from service operators, but even this comes at a cost. We have investigated the length of time take it takes to make a request for a call-back when calling three essential and important services; the Telecommunications Industry Ombudsman (TIO), Centrelink and the Energy and Water Ombudsman, NSW (EWON).

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<sup>2</sup> DBCDE, *Online Statistics Communications Mobile Phones*, June 2006

<sup>3</sup> Low Income Measures Assessment Committee, *Telstra's Access for Everyone low-income measures package, Report to the Minister for Communications Information Technology and the Arts 2006*, p7, accessed at <http://www.telstra.com.au/abouttelstra/download/document/limac-report-2006.pdf> on 25 June 2010.

<sup>4</sup> F. Brady, L. E. Dyson & T. Asela, *Indigenous Adoption of Mobile Phones and Oral Culture*, Refereed conference paper, Cultural Attitudes towards Technology and Communication, Nîmes, France, 24-27 June, p393, accessed at <http://www-staff.it.uts.edu.au/~laurel/Publications/IndigenousAdoptionOfMobilePhones&OralCulture.pdf> on 20 July 2010

- TIO - 1800 062 058: The earliest a caller can get through to speak to someone and ask them to call them back is after one minute, 15 seconds.
- Centrelink – Employment Services - 132850: The earliest a caller can get through to speak to someone and ask them to call them back is after one minute, 50 seconds.
- Energy and Water Ombudsman, NSW – 1800 246 545: The earliest a caller can leave a voicemail with their number for EWON to call them back is one minute. It takes a minimum two minutes to actually speak to someone.

On a basic post-paid phone plan a significant amount of calling time would be used up by calling these three essential and important services long enough to request a call-back on their mobile. For example, with a Vodafone \$19 Cap plan each 2 minute call would use up \$2.15 worth of credit.<sup>5</sup> If the consumer were to call each of these three services four times per month and wait on the phone just long enough to request a call-back on their mobile it would use up \$25.80 of their \$70 worth of calls. This means a customer could theoretically use more than a third of their total calling allowance on just trying to get their service providers to call them back. Timed call charges also increase the likelihood that these customers will go over their \$70 entitled calls and be charged very high rates, potentially leading them into debt. Australians generally and low-income Australians in particular should not have to spend such large amounts on accessing these basic services, when they would otherwise be either free or at a low fixed-rate if accessed from a landline.

### **2.5 Accessing government services**

Accessing government services by phone is important for many Australians including those on low-incomes. Community services have reported that people on income support in the Northern Territory who are subject to compulsory income-management measures may in some places or on some occasions only be able to find out their available balance on the Basic Cards by calling Centrelink. Finding out their account balance is essential for people on compulsory income management in order to be able work out whether they have enough money to do a basic transaction, such as grocery shopping for example. Centrelink also requires clients subject to income-management measures to contact them every time they wish to change their income management allocations. For example, this may be necessary in order to establish a new allocation to pay for a local bus. The essential and frequent calling from a mobile to Centrelink is subject to the variable charges of telecommunications providers and the considerable waiting times often inherent in calling freephone or local rate services.

### **2.6 Accessing Telecommunications providers**

The major telecommunications providers allow customers to call their customer service numbers from mobiles for free or the cost of a local call (or 25 cents) – see Box 1 below. This suggests that major telecommunications providers recognise that call costs for important service related purposes should be free or limited to a fixed-rate, regardless of whether the call is from a landline or mobile phone. It also demonstrates that telecommunications providers have the capacity to deliver access to important numbers at untimed rates.

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<sup>5</sup> Under this plan, the user is entitled to \$70 worth of national calls. There is a 35c flagfall and 90c per minute calling rate.

**Box 1: Cost of accessing Telecommunications providers customer support services**

**Vodafone:** Calling 1555 Vodafone Customer Care from Australia - free for all customers except those on Vodafone SIM only Caps and \$29 Vodafone Cap Contract and some Closed Plans, where a flat fee of \$2.50 is charged (excluding calls made by disadvantaged customers and enquiries relating to bills, charging and billing services). Or call 1300 650 410 (standard charges apply within Australia).

**Optus:** Customer compliment and Complaints : Personal Service Difficulties & Faults: Mobile, Home Phone & TV: 131 344 – local call cost.  
Free call self-service : Account and Billing Issues: Account Balance, Last Payment, Payment Extensions Requests, Advise / Report a Payment, Change Billing Address – 1555 free call from mobile

**Telstra:** Accounts & Payments Connections & Disconnections Faults & Repairs 125 111 – free call from Telstra mobile or landline

In the TIO's 2008/2009 annual report, customer service was the second most numerous complaint issue category.<sup>6</sup> The third most common customer service problem was when customers were unable to contact their service providers or had to wait a long time before being able to speak with someone. Waiting on hold is a serious consumer issue with telecommunications providers.

In June 2010, Telstra announced that calls from Telstra services (either fixed or landline) to its customer service line would be free of charge. This is welcome but ultimately the call should be free from other network services too. Such an approach demonstrates that if they want to, providers can ensure fair access by all consumers to 1800 and 13 numbers for essential and important services. We also welcome Telstra's recently expressed "support for the consumer protections such as untimed local calls being available to all Australians".<sup>7</sup> This rationale underpins the policy behind the call for untimed charges for freephone and local rate services from mobiles.

### 3. Consumer Detriments

Because of the high rate of mobile phone use among low-income and vulnerable consumers, this group of consumers who can least afford it tends to suffer the serious material disadvantage that arises from costly 1800 and 13/1300 services. The material disadvantage that results includes an inability to access essential and important services, the risk of debt and confusion about pricing. These are addressed below.

<sup>6</sup> Telecommunications Industry Ombudsman, *Annual Report 2008-2009*, p43, accessed at [http://tio.com.au/publications/annual\\_reports/ar2009/PDFs/AR\\_09\\_PartFour.pdf](http://tio.com.au/publications/annual_reports/ar2009/PDFs/AR_09_PartFour.pdf) on 20 July 2010

<sup>7</sup> Bingemann M, *The Australian*, "Government extends pricing cap on Telstra local calls" 17 June 2010 accessed at <http://www.theaustralian.com.au/business/government-extends-pricing-cap-on-telstra-local-calls/story-e6fmg8zx-1225880594513> on 23 July 2010



### 3.1 Inadequate access to services

Consumers with pre-paid accounts sometimes cannot afford to make calls from their mobiles to essential service providers on the 1800 or 13 contact numbers, such as financial counsellors. Statistics on the frequency of this are difficult to obtain and research into this would help clarify the extent of the problem. However anecdotal evidence suggests that rural consumers and people on low incomes experience this difficulty in a variety of circumstances. Financial counsellors report clients often ask the counsellors to call them back on their mobile which they invariably do – at cost to financial counselling organisations. More seriously, when clients run out of credit they may stop calling altogether and thus miss out on essential personal and financial advice. They can only make calls again to essential and important services once they buy further credit.

The recent election commitment by the Australian Labor Party to increase funding to Lifeline is welcome, as is the recognition that the cost of accessing Lifeline services is problematic. According to the government's announcement;

“additional funding will also enable calls to Lifeline from mobiles to be toll-free. More than half of all callers to Lifeline are from mobile phones, which frequently attract higher call costs. High call costs can be a real barrier to people seeking crisis counselling services.”<sup>8</sup>

Just as high calls costs from mobiles are a barrier for people to access Lifeline, high calls costs from mobiles are also a barrier to individuals accessing a range of other essential and important services. Free or untimed low-cost access to the services outlined should be provided for all Australians.

#### **Box 2: Case study: *Clients of the Northern Rivers Community Legal Centre***

Northern Rivers Community Legal Centre services clients who are typically either on low incomes or recipients of government income support. These groups are more likely to use pre-paid mobile phone services which charge at a higher rate than that charged on post-paid mobile phone plans. This means that the target client group pays a higher call cost when they make a call from their mobile telephone to a 1800 or 13 number.

Lengthy waiting times are not unusual when accessing government and community services by phone. In addition, as their service is in a rural region their clients do not have the benefit of competitive mobile phone rates that may be available in metropolitan areas with most clients requiring Telstra NextG mobile service to maximise mobile phone coverage.

The Northern Rivers region of NSW has a large Indigenous population living in communities without public transport and with very little access to fixed line telephone services. These clients are usually only able to access community services by calling from a mobile phone telephone. The multiple disadvantages faced by these clients is further exacerbated when they do not benefit from the cost effective service 1800 and 13 numbers provided and paid for by community services.

<sup>8</sup> Australian Labor Party, *Mental health: taking action to tackle suicide*, 27 July 2010, Position statement, p5, accessed at <http://www.alp.org.au/getattachment/b60ee435-80f5-4891-be4e-27c1d15dea5e/mental-health--taking-action-to-tackle-suicide/> on 3 August 2010

### 3.2 Consumers going into debt

For consumers with post-paid mobile accounts freephone and local rate calls can, perversely, cause them to accrue debt. For vulnerable consumers, such as those on low-incomes, this can exacerbate an already precarious financial situation. The National Youth Affairs Research Scheme has researched this in its *Young People Report* and finds as follows;

“...the highest rates of child *mobile phone* ownership occur in the lowest income households. Therefore it is low income households that experience the greatest financial difficulties associated with child mobile phone debt.”<sup>9</sup>

According to this study, children aged 12-17 years from low-income families are also most likely to experience other associated problems such as losing access to mobile networks. The social equity issue is stark. The main reason for borrowing money for a quarter of these young people was to spend on mobile phones (24%).<sup>10</sup> The *Young People Report* does not detail how this borrowed money was repaid but it is reasonable to assume that some young people would have had difficulty doing so.<sup>11</sup> A reduction in costs for calls to 1800 and 13 numbers could help young people avoid borrowing money to spend on their mobile thus reducing the likelihood of getting into debt.

### 3.3 Confusion about pricing

The whole premise behind 1800 and 13 numbers is for the calls to be free and at a low fixed-rate respectively. The general assumption made reasonably by consumers is undermined by the current structure of variable charging rates from mobile phones. While there is little statistical data on the extent of confusion caused by current charges, financial counsellors have reported to us that the variable charges for calls to 1800 and 13 numbers from mobiles cause consumers frustration and confusion.

### 3.4 Possibility of double-charging

Charges for 13 numbers are partly subsidised by the organisation which selects such a number with the other part being paid the caller. Organisations with a 1800 number completely subsidise the cost of the call. It seems that telecommunications service providers may be double dipping, receiving payment from the 1800 or 13 number owners for calls made to the service and then also charging customers who call from their mobiles to these numbers.

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<sup>9</sup> Urbis Consulting, *Young People (12-17 years) & Financial Debt*, Report to the National Youth Affairs Research Scheme, 2008, p52, accessed at <http://www.dest.gov.au/NR/rdonlyres/EC424B11-D132-4F27-880D-0957B91C7E9A/25114/FinancialDebitFinalPDFversionNov08.pdf> on 5 July 2010

<sup>10</sup> *Ibid*, p7

<sup>11</sup> *Ibid*

## 4. Potential Solutions

We recognise that the optimal solution may involve a combination of the following ideas and possibly others solution not canvassed here. We encourage the ACMA to consult with stakeholders about how to best achieve fair charges for freephone and local rate calls from mobiles.

**Regulatory Reform:** The ACMA has recently announced that it will be reviewing the *Telecommunications Numbering Plan 1997* Numbering Plan (the Numbering Plan). We note that the root cause of the problem lies in the application of freephone and local call rate service to standard telephone services only. The ACMA should consider expanding its definitions to include mobile telecommunications services in freephone and local rate services. The review of the Numbering Plan may be a useful opportunity to address this.

This systemic approach should directly address the social-equity issues explored in this super-complaint, ensuring action by all telecommunications providers.

**Industry-led:** The telecommunications industry could consider making changes to billing processes so that consumer charges for calls from mobile phones to designated freephone and local rate services match the charges when calling from landlines. See for example, section 3 above, documenting the industry practices already in place to make their telephone contact service affordable for their customers.

This may offer the most flexible solution as telecommunications providers will be able to directly tailor their billing structures to address the social equity issues explored in this super-complaint.

**Technological Change:** Some stakeholders have suggested that it may be appropriate to create a new numbering series exclusively for calls from mobiles to essential and important services which use 1800 and 13 numbers. This may directly address the social equity issues explored in this super-complaint.

This approach, however, may cause administrative challenges for organisations including important and essential services, who would likely incur considerable cost and time with changing their advertising, letterheads and websites to include the new phone number. From a consumer perspective an additional number may be confusing and leave them unsure which number to call. If this is the preferred option, consideration should be given of whether to adopt a wholesale change of phone numbers or to create a second number for consumers call from a mobile.

## 5. Super-complaints explained

A super-complaint is a complaint about any feature, or combination of features, of a market for goods or services that harms, or appears to be significantly harming the interests of consumers. This concept originated in the United Kingdom and is enshrined there in law in the *Enterprise Act 2002*<sup>12</sup>. Under this framework, an organisation may be eligible to make a super-complaint if it appears to represent the interests of consumers of any description. Super-complaints are given fast-track consideration and agencies are required to publish a reasoned response within 90 calendar days from the day after a complaint is received.<sup>13</sup>

In Australia no legislation exists requiring a regulator to respond to a super-complaint. We believe that the investigation process for this Super-complaint should take the lead from the UK process. This includes ensuring that the ACMA:

- publicise the fact that it is investigating a super-complaint about the cost of accessing 1800 and 13/1300 services from mobile phones;
- consult widely with stakeholders, including all relevant telecommunications providers, consumer groups, and government bodies;
- provide clear explanation and reasoning for the investigations process, as well as behind any recommendations it makes;
- respond to the Super-complaint within 90 days of lodgement; and
- consider using all appropriate powers in its investigation of the Super-complaint, including the information gather powers under s521 of *Telecommunications Act 1997*.

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<sup>12</sup> Available at <http://www.legislation.gov.uk/ukpga/2002/40/contents> - at 25 August 2010

<sup>13</sup> For further guidance on how super-complaints operate in the UK, see *Super-complaints - Guidance for designated consumer bodies*, available at [http://www.ofcom.gov.uk/shared\\_ofcom/business\\_leaflets/enterprise\\_act/ofcom514.pdf](http://www.ofcom.gov.uk/shared_ofcom/business_leaflets/enterprise_act/ofcom514.pdf) - 25 August 2010

## 6. References

Australian Communications and Media Authority, *Communications Report 2008-09*, Commonwealth of Australia, 2009

Australian Labor Party, Position Statement, *Mental health: taking action to tackle suicide*, 27 July 2010, Canberra, accessed at <http://www.alp.org.au/getattachment/b60ee435-80f5-4891-be4e-27c1d15dea5e/mental-health--taking-action-to-tackle-suicide/> on 3 August 2010

Bingemann M, 17 June 2010, "Government extends pricing cap on Telstra local calls", *The Australian*, accessed at <http://www.theaustralian.com.au/business/government-extends-pricing-cap-on-telstra-local-calls/story-e6frg8zx-1225880594513> on 23 July 2010

F. Brady, L. E. Dyson & T. Asela, *Indigenous Adoption of Mobile Phones and Oral Culture*, Refereed conference paper, Cultural Attitudes towards Technology and Communication, Nîmes, France, 24-27 June, p393, accessed at <http://www-staff.it.uts.edu.au/~laurel/Publications/IndigenousAdoptionOfMobilePhones&OralCulture.pdf> on 20 July 2010

Department of Broadband, Communications, and the Digital Economy, *Online Statistics Communications Mobile Phones*, June 2006, accessed at: [http://www.archive.dbcde.gov.au/2008/01/statistical\\_benchmarking/online\\_statistics](http://www.archive.dbcde.gov.au/2008/01/statistical_benchmarking/online_statistics), on 16 July 2010

Low Income Measures Assessment Committee, *Telstra's Access for Everyone low-income measures package, Report to the Minister for Communications Information Technology and the Art 2006*, p7, accessed at <http://www.telstra.com.au/abouttelstra/download/document/limac-report-2006.pdf> on 25 June 2010

Telecommunications Industry Ombudsman, *Annual Report 2009*

Urbis Consulting, *Young People (12-17 years) & Financial Debt*, Report to the National Youth Affairs Research Scheme, 2008, p52, accessed at <http://www.dest.gov.au/NR/rdonlyres/EC424B11-D132-4F27-880D-0957B91C7E9A/25114/FinancialDebitFinalPDFversionNov08.pdf> on 5 July 2010

Vodafone, *Terms and Conditions Post-paid*, accessed at <http://vodafone.com.au/personal/plans/termsandconditions/index.htm> on 27 July 2010

Vodafone, *Vodafone \$19 Cap*, accessed at <http://store.vodafone.com.au/vodafone-caps-mobile-phone-plans.aspx> on 27 July 2010