Friday 8 November

Craig Purdon
Project Manager
Communications Alliance
By email: c.purdon@commsalliance.com.au

Dear Craig,

Re: DR C555:2019 – Integrated Public Number Database (IPND) Code

ACCAN welcomes the opportunity to offer a feedback on Communications Alliance's draft Integrated Public Number Database (IPND) Industry Code (DR C555:2019) (hereafter the draft Code).

We have engaged extensively with IPND-related policy issues in the past. Our long-term concerns for the IPND have been in relation to:

- Data accuracy for the purposes of emergency calls, emergency warnings and law enforcement;
- Privacy of and access to Public Number Customer Data (PNCD); and
- Consumer awareness of the IPND.

ACCAN supports the intended outcomes of this Code review: to improve the integrity and accuracy of the IPND, and provide clarity on a number of components of the current IPND Code. The draft Code partially meets these outcomes. Please find our general comments and specific feedback on the draft Code below.

General comments

As outlined in the Terms of Reference (ToR), the intention of this Code review is to amend deficiencies in the current IPND Code that were identified by the ACMA in its 2018 review of the IPND.[1] The draft Code adequately addresses the first and third aspects of the ToR. These state that the 2017 Code should be amended to:

- Include a regular mandatory feedback mechanism for the reconciliation of a CSP's customer records against its records in the IPND; and
- Review and amend inconsistency in the treatment of some public numbers under the IPND Code.

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[1] Communications Alliance 2019, *WC91: Integrated Public Number Database (IPND) Industry Code Terms of Reference*, accessed 1 November 2019,
https://www.commsalliance.com.au/__data/assets/pdf_file/0005/65336/WC91-Terms-of-Reference_2019.pdf

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However, the second and fourth components of the ToR have not fully been met. These are to:

- Include mandatory requirements surrounding Changed Data Provider reports; and
- Review additional operational improvements and issues that have arisen from recent ACMA reconciliation activities.

Changed Data Provider Reports

ACCAN does not consider that the second component of the ToR has been met in the draft Code. The ToR state:

2. Review of Changed Data Provider reports issued by the IPND Manager – clause 6.1.10; Amend to include mandatory requirements for CSPs to:
review monthly, take corrective action, notify other CSPs of incorrect overwritten records and maintain a record of CSPs who overwrite IPND records.

The draft Code does not adequately address this. The note box in Section 5.1.13 of the draft Code states, 'All Data Providers **should** check their monthly changed data provider report', rather than **must**. There is no reference to CSPs notifying other CSPs of incorrect overwritten records, or maintaining a record of CSPs overwriting records.

ACCAN understands the logistical limitations to addressing certain technical changes to the IPND and consequently the IPND Code. We have provided comment on this matter in the following section.

Additional operational improvements

ACCAN understands that additional ACMA recommendations surrounding changes to the Code cannot be adopted until industry stakeholders undertake extensive internal reviews of IPND technical capabilities and processes. It is regrettable that as a consequence further improvements of the IPND Code will not be addressed until sometime next year, especially considering that the need for delay stems from:

- a historical lack of engagement with the technical capabilities and capacity of the IPND;
- CSPs giving low priority to internal best practice IPND reporting and reconciliation; and
- CSPs giving low priority to allocating sufficient resources to satisfy this end.

We recognise the logistical limitations addressed during the Code review. However, we stress the need to progress the IPND changes identified by the ACMA as quickly as practicable. This will ensure that IPND Data Users such as law enforcement personnel and Emergency Call People have access to the accurate PNCD.

Suggestions for further action

The draft Code and its previous versions are impenetrable to the general consumer. Definitions and instructions should be communicated in plain English and simple sentences, with as little jargon as possible. Included in the following section are a number of suggestions to support this.

It is difficult to keep track of the various timelines that apply to IPND-related activities. The IPND Obligations and Timelines table in Appendix B is a welcome addition. Any IPND-related activities with an associated timeframe should be included in this table. We note that the 20 business day timeframe for responding to a customer's request for their PNCD should be included in Appendix B.[2]

Communications Alliance's Industry Guideline G619:2017 – IPND Data should be reviewed in line with changes to the IPND Code. Particular attention should be paid to detailing a best practice approach to PNCD data reconciliation.

We have provided further commentary on our concerns and suggestions regarding specific aspects of the draft Code below.

Feedback on the draft Code

PNCD data quality

There is inconsistency in the draft Code about timeframes for correcting incorrect PNCD. Section 5.3.3 states that Data Providers must reconcile and amend the 6-monthly extract of their PNCD with the relevant CSP Customer data and sending the updated PNCD to the IPND Manager within **15 business days of the PNCD extract being downloaded**.

However, Section 5.2.1 states that a CSP (that may be a Data Provider), upon confirming that a Customer's PNCD is incorrect, must take reasonable steps to ensure that **incorrect data is corrected and sent to the IPND Manager within two Business Days**, subject to operational limitations.

This inconsistency should be amended, or further clarification as to why these timeframes differ should be included in the Code.

Changes to definitions

We support the amended definitions of key terms outlined in the draft Code. However, we recommend that the wording of Reconciliation be simplified for clarity. Currently, the definition reads:

> *Reconciliation means the comparison and correction by a CSP, or Data Provider, of the PNCD held by the IPND Manager associated to that particular CSP, or Data Provider, with the CSP, or Data Providers own data for a Number that is: -*
>
> > *1. an active service …*

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[2] Communications Alliance 2019, *Industry Code DR C555:2019*, Section 6.2.3, accessed 1 November 2019, https://www.commsalliance.com.au/__data/assets/pdf_file/0011/66953/C555_2019_Public-comment-draft.pdf

We recommend this definition be changed to:

> *Reconciliation means the **mandatory** comparison and correction of PNCD **held by the IPND Manager with PNCD held by the CSP or Data Provider. This reconciliation is undertaken by the CSP or Data Provider with their associated PNCD in the IPND**, for a Number that is: -*
>
> > *1. an active service …*

Data provision to the IPND

The draft Code has changed section 4.2.1 to include transactions relating to connections and disconnections. It states:

> *4.2.1 Each CSP that provides a Carriage Service to a Customer using a Number must provide the IPND Manager the relevant PNCD transaction updates in respect of each Carriage Service it supplies, that occur on one Business Day, by the end of the next Business Day. This includes all transactions relating to connections or disconnections.*

We recommend this section be amended to the following, to emphasise that new PNCD, as well as transaction updates, need to be provided to the IPND manager:

> *4.2.1 Each CSP that provides a Carriage Service to a Customer using a Number must provide the IPND Manager the relevant PNCD, **including** transaction updates, in respect of each Carriage Service it supplies, that occur on one Business Day, by the end of the next Business Day. This includes all transactions updates relating to connections or disconnections.*

Section 4.2.2 should specify the timeframe in which a CSP must register with the IPND Manager; currently, the draft Code states this must occur 'in a timely manner'. A specific timeframe will ensure CSPs are able to fulfil their obligation in Section 4.2.1 above.

PNCD Data Errors

We wish to clarify the timeframe for resolving Data Errors for Data Providers compared to CSPs. Section 6.1.6 states:

> *6.1.6 The Data Provider must download the information referred to in clauses 6.1.1, 6.1.4 and 6.1.5 on the same Business Day as being made available by the IPND Manager and either take reasonable steps to resolve the matter and supply the corrected PNCD to the IPND Manager within one Business Day, or to pass the information to the relevant CSP within the same Business Day.*

This section does not specify a timeframe for resolving errors and supplying correct PNCD to the IPND Manager in instances where the CSP has been provided with the errors from a third-party Data Provider. A timeframe should be specified for CSPs receiving this information from Data Providers, as it is for CSPs who are also Data Providers.

Structural recommendations

We have a number of recommendations for terms that may be better phrased or structured for clarity. Firstly, Section 1.1.12 (1) should be restructured as its own clause for consistent formatting. The draft Code states:

> *1.1.12 Part 4 of Schedule 2 of the Act sets out the obligations to provide and maintain an IPND and the CSPs responsibilities, as follows:*
>
> > *1. This clause applies if Telstra is obliged by a condition of a carrier licence to provide and maintain an integrated public number database.*
> > *2. If …*

This should be changed to the following, or something similar:

> *1.1.12 Part 4 of Schedule 2 of the Act sets out the obligations to provide and maintain an IPND and the CSPs responsibilities, as follows:*
>
> > *a) If …*
>
> **1.1.13 Clause 1.1.12** *applies if Telstra is obliged by a condition of a carrier licence to provide and maintain an integrated public number database.*

It is unclear why reference to 'that other person or association' has been removed, and here applies only to Telstra. The 2017 Code refers to instances where 'Telstra or that other person or association is under an obligation to provide and maintain an IPND'.[3]

Secondly, we recommend the rewording of clauses 4.2.4 and 4.2.5 for ease of comprehension. Currently, these sections read:

> *4.2.4 The IPND Manager must make information available about becoming a Data Provider to the person registering with the IPND Manager under clause 4.2.2 and provide the necessary Information Package within 20 Business Days of receiving a written request for such information and/or an expression of interest in becoming an IPND Data Provider.*
>
> *4.2.5 The IPND Manager must provide make available an Information Package to persons wishing to register as an IPND Data Provider on an equitable basis.*

We recommend this be amended to:

> *4.2.4 The IPND Manager must* **make available an Information Package** *about becoming a Data Provider to the person registering with the IPND Manager* **under clause 4.2.2**.
>
> *4.2.5* **This Information Package must be provided by the IPND Manager** *within 20 Business Days of receiving a written request for such information and/or an expression of interest in becoming an IPND Data Provider,* **and must be provided on an equitable basis**.

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[3] Communications Alliance 2017, *Industry Code: C555:2017*, Section 1.1.12, accessed 30 October 2019, https://www.commsalliance.com.au/__data/assets/pdf_file/0006/59244/C555_2017_Nov.pdf

Concluding remarks

Thank you again for the opportunity to provide feedback on DR C555:2019. Please do not hesitate to contact me at Rebekah.Sarkoezy@accan.org.au or at 02 9288 4000 should you require further clarification on any of the points raised.

Yours Sincerely,

Rebekah Sarkoezy
Policy Officer