



**Proposals for reduction in
telecommunications reporting
requirements
ACMA Consultation Paper**

Synopsis of response by the Australian Communications Consumer
Action Network

5 May 2014

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 represent the views of its broad and diverse membership base to policy makers, government and industry to get better outcomes for all communications consumers.

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Introduction

The following is a synopsis of ACCAN's full submission which summarises our position on the ACMA Consultation Paper on *Proposals for reduction in telecommunications reporting requirements*.

1. Mobile Premium Services consumer information obligations

ACCAN does not support the removal of all of these requirements from the Determination on the premise that they may be included in future by an industry code. However, we do support the repeal of Sections 12(4) and 12(5).

We agree with the ACMA that it is vitally important that the barring requirements remain in place and ensure this mechanism continues to be effective. We also maintain that consumers must at a minimum be informed of this option when signing up for a service and when making an enquiry or complaint. In recognition of the drop in TIO complaint numbers in relation to MPS, we do not believe that it is necessary to have ongoing information requirement every 3 to 6 months or on a customer's bill. Rather than wholesale removal of sections 11 and 12, this nuanced amendment is in line with current industry proposals on MPS deregulation.¹ As such we believe it better maintains the balance between burden on industry and effective consumer protection.

2. Telecommunications annual performance reporting under section 105 TA

ACCAN supports proposals for a longer term review of industry reporting requirements. However, we note the valuable role of data published by the ACMA as a basis for informed policy development. Ongoing reporting requirements are also vital in ensuring transparency and accountability in the communications sector.

ACCAN believes that we need to retain the knowledge collated by Section 105 while balancing any onerous requirements of record keeping on providers. We recommend an ACMA review of the reporting requirements with a clear justification for any need to remove or scale back data collection. The decision to remove a requirement should be based upon a finding that it is duplicated elsewhere or a clear demonstration that the cost is out of all proportion with the benefit of collection.

3. Customer Service Guarantee six monthly reporting

ACCAN agrees with the ACMA that reduction from six monthly reporting will not adversely impact on consumers. We support its repeal.

4. Payphone performance six monthly reporting

ACCAN agrees with the ACMA that reduction from six monthly reporting will not adversely impact on consumers. We support its repeal.

¹ Optus, 2013, 'Deregulation: Initiatives in the Communications Sector', Letter to the Minister for Communications, 19 December, 2013, p.21; AMTA, 2013, 'Deregulation: Initiatives in the Communications Sector', Letter to the Minister for Communications, 19 December, 2013, p.8

5. Integrated Public Number Database Scheme reporting

The Department of Communications is currently reviewing the Integrated Public Number Database (IPND) and therefore it is our view that the reporting provisions of the IPND should not be considered in isolation.

We believe there is an important role for reporting related to compliance.

6. Emergency Call Service record-keeping and reporting

The Telecommunications (Emergency Call Service) Determination 2009 (the ECS Determination) is an important element of the regulation ensuring easy and efficient access to emergency services. ACCAN agrees with the ACMA that there is potential duplication in some of the record keeping requirements in the ECS determination. We therefore support the removal of sections 61 and 62 of the ECS Determination because there is also a general requirement covering these written arrangements in section 7. We believe there would be no adverse implications for the effective function of the Emergency Call service if these clauses were to be repealed.