

Communications Alliance
Level 12, 75 Miller Street
North Sydney NSW 2060

7 December 2017

Dear Sir/Madam

Comment Sought on Industry Code C518:2006 Call Charging and Billing Accuracy Code

Thank you for the opportunity to provide our comments in relation to the Operational Reference Panel's proposed deregistration and repeal of the Call Charging and Billing Accuracy Code (Code).

Foxtel is a carriage service provider (CSP) of residential telephony and broadband services and provides broadcasting and content services over cable, satellite and broadband distribution platforms.

Foxtel supports the deregistration and the repeal of the Code and wishes to make the following brief comments in support of the changes.

1. We believe that as a reseller, compliance with the Code is effectively redundant as it is our wholesale provider (Telstra Wholesale (TW)) who creates call records. Foxtel only receives the single call records (CDR) per customer from TW. This means that the only way we can confirm billing accuracy is by checking that the CDR provided matches the correct call rating in our billing system. For example, if the CDR data that TW has provided is wrong, Foxtel is unable to verify this. As a result, the majority of the compliance obligations under the Code sit with TW, as our wholesale provider, rather than with Foxtel as the reseller.
2. As already identified by the Operational Reference Panel, the majority of Foxtel's telephony customers are receiving unlimited local and national call packs. This means that the need for the Code, where industry is moving towards this model, becomes less significant.
3. Last, in an environment where there is significant telecommunications regulation, the time and effort required to conduct the testing is unnecessarily burdensome, particularly where the industry has shifted since the introduction of the Code and a large number of customers (including Foxtel's) are now using non-PSTN services, such as VOIP.

Thank you for the opportunity to comment on these matters.

Yours Sincerely,



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