

**Communications Alliance
Australian Mobile Telecommunications Association (AMTA)**

**Response
to
ACCAN/ ACOSS/ AFFCRA submission
on the
Cost of Accessing 1800 and 13/1300 Services from Mobile Phones**

November 2010

BUSINESS IN CONFIDENCE

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1. Executive Summary

Communications Alliance and AMTA are seeking to respond to the issues raised in the ACCAN et al submission on 1800 and 13/ 1300 numbers, a particular example of which was raised in the Government's pre-election announcements on mental health services, specifically, regarding access to Lifeline from mobile phones.

The development and use of 1800 and 13/ 1300 services in Australia has a long history, with current arrangements dating back to the early 1990s. This needs to be taken into account in understanding the (different) charging arrangements that apply from fixed lines and from mobiles, and in understanding what solutions may be most usefully explored.

Industry notes the rapid changes that have taken place in consumer preferences and communications technologies and so it may be timely to consider these arrangements.

However, the issues raised in the submission need to be better understood and clarified to allow better assessment of their scope and impact. For example, access to important social support services from a mobile phone is a different issue to consumer awareness of the details of the Numbering Plan.

Contra the submission, neither the current ACMA Numbering Plan review nor other regulatory intervention would provide a timely and sustainable solution to these matters. As a way ahead, therefore, industry is seeking further engagement with interested stakeholders, including ACCAN, community and commercial service providers, and Government agencies to discuss these matters.

2. ACCAN/ ACOSS/ AFCCRA Submission – General Commentary

The submission identifies a feature of the current industry supply model and charging arrangements for Freephone and Local Rate services (FLRNs) and suggests some potential adverse impacts on some consumers.

The context for these claims is the enormous growth in the use of mobile telephones in Australia since the current FLRN arrangements were introduced in the early 1990s.

There is no suggestion, nor evidence, that industry players have acted incorrectly or inappropriately. This is a case of the marketplace, consumer behaviour and technology changing at a rapid pace.

Unfortunately, the submission betrays little attempt to understand the role of the Numbering Plan, the industry dynamics and supply model that have led to this situation. The submission is generally heavy on assertion and light on evidence.

While some of the impacts identified in the submission may be occurring, it provides no perspective on the size or scope of the issue.

It is clear that some consumers are choosing to use a mobile phone for all their calling and giving up their fixed line service. However, this is generally done on the basis of weighing up the costs and benefits of such an arrangement and calls to FLRNs from mobiles are one cost of that choice that is taken into account and offset by the benefits (savings) the consumer sees with a mobile-only arrangement.

It is also clear that both customers and community service providers are using a variety of options for this type of calling. These include:

- making such calls from a payphone;

- informal "call-back" arrangements; and
- use of 1300SMS type services that allow the customer to send an SMS to the community service provider who will then call them back.

The submission provides little information that would help prioritise a response among the many issues on the agenda of industry, regulators, consumer advocates and corporations generally. For example, the submission would appear to raise at least three (sub-)issues:

- access to important FLRNs when a customer has no credit left on their account;
- charges for access to important FLRNs from a mobile phone; and
- consumer perceptions about the *Telecommunications Numbering Plan 1997* (the Numbering Plan) and FLRNs.

There may be a range of potential solutions to each of these sub-issues. It would therefore be helpful if the key concerns of consumers could be identified (e.g. access to important social services by people on a low income), in consultation with industry, so that viable, targeted, options could be discussed.

The submission also appears to have been made without any attempt to engage with the supply side of the industry, neither the mobile carriers and service providers, nor the FLRN suppliers.

It also appears that no contact has been made with the community service providers or Government departments offering this method of access to the public, nor with the business users of these services. For example, would these organisations be willing to take on additional costs for mobile originated calls?

The general lack of consultation with major stakeholder groups is a significant shortcoming on the part of ACCAN. The industry devotes considerable time and resources to engaging with stakeholders – particularly consumer groups – in a responsible manner and believes that better outcomes will accrue if ACCAN reciprocated in this regard.

3. Background to the introduction of FLRNs in Australia

To understand the charging arrangements for FLRNs in Australia requires a historical perspective.

In Australia, the equivalent of the USA 800 service was 008 (Inward Wide Area Telephone Services), which came into being in the 1960s for commercial use (e.g. by major hotel chains) to allow local number access to commercial organisations, with calls charged at the local call rate regardless of geographical location. This was later changed to allow calls at no charge to the "A" party.

Government and not-for-profit organisations were not a primary driver in the initial development of these services – they were an invention of carriers and commercial customers to overcome the obligation to apply STD charges to non-local calls. An added advantage was that a single national number could be advertised, making it easier for customers to remember and call.

Telstra started using a 008 number (008 043 211) for bill enquiries, in lieu of a free local number, in June 1990.

In December 1991 Austel wrote a paper titled 'Your Number's Up' which proposed a change from 008 to 1800 and also denoted 13 numbers for special (premium) services.

In the Austel Numbering Plan April 1993 '1800' numbers came into existence, and '13' numbers were denoted as Premium Service Special Network Numbers.

4. Regulatory charging framework

FLRNs have arisen as a commercial construct to enable large (business) organisations to give their customers a better experience by providing more convenient access. Since they are services used mainly by businesses, there is no regulation relating to charges for calls to these numbers.

1800 services are "B party charging", i.e. the called party bears the cost relating to a call from a (fixed line) geographic number. During the introductory stages of mobile services, the number of mobile customers and services in operation was low and the costs associated with mobile calls were relatively high. So from the days of the Analogue Mobile Network, the calling party paid mobile air time call charges for calls to 1800/ 008 numbers.

13/ 1300 services are a user-pays service where the cost to the caller is characterised as a "Local Rate". Callers from a mobile service pay a charge depending on the plan they have with their service provider.

While the Numbering Plan goes into the minutiae of number management activities associated with FLRNs, it does not identify any specific charging principles relating to them; unlike some other number types.

Further, the ACCC noted in its 2004 mobile services review, regarding mobile-originating access services that:

...none of the submissions received by the ACCC in the course of this inquiry identified a situation where a carrier failed to provide access on reasonable terms.

What is special about calls to 13/1300 and 1800 numbers?

Under the Telecommunications Numbering Plan 1997 (the Numbering Plan), calls to 13/1300 numbers are referred to as "local rate" services. This is because calls to these numbers from a fixed-line phone cannot be charged at a rate greater than the maximum amount permitted for untimed local calls. Calls made from a fixed-line phone to 1800 numbers are referred to as "freephone" services, as they must be made available free of charge. 13/1300 and 1800 numbers are generally used by providers who wish to promote national coverage to a well-known number. Importantly, calls made from a mobile phone to either a 13/1300 or 1800 service are not subject to the same retail price restrictions as those made from a fixed-line phone. Indeed, the cost of calls to 13/1300 and 1800 services is often levied on a timed basis and at rates similar to or greater than those of normal calls from mobile phones.

(See www.accc.gov.au/content/index.phtml/itemId/333898 and www.accc.gov.au/content/index.phtml/itemId/531958/fromItemId/465054)

5. Examples of how calls to FLRNs from mobiles are charged today

The following data is publicly available and relates to post-pay mobile rates being charged by a Tier One Australian Mobile Carrier:

- Caps and Sim Only plans: 35c Flagfall + 90c per minute (standard call rate), however, this is IN CAP, so the effective rate may be lower
- \$79 Unlimited plans: 35c Flagfall + 30c per 30 seconds
- \$99 & \$119 Unlimited plans: Calls are included in the unlimited call bucket

The following data is publicly available and relates to the pre-paid rate charged by another Tier One Australian Mobile Carrier:

- Call connection fee 35c; calls charged at 40c per 30 sec (incl. GST)

6. Dimensions of the FLRN market in Australia

As at October 2010 there were approximately 291 000 active FLRN services in operation (SIOs) in Australia, broken down as follows:

- 1300 = 174 000
- 13 = 2 100
- 1800 = 115 000

The services are operated by approximately 100 000 customers, including corporations, State and Federal Government Departments and agencies, local governments and agencies, charities, community-based organisations and others. The services are sold to these customers under commercial contracts by one of the seven subscribers to INMS (Industry Number Management Services Ltd, see Attachment 2), or by one of the many services providers who re-sell the services of those subscribers.

Freephone services are used for many different purposes within the industry. Each of these has its own specific parameters. The main three purposes are:

- Eftpos: This is by far the highest volume of calls using 1800 numbers. These are machine to machine calls when an Eftpos transaction is made. These can be mobile-originated also e.g. stalls at markets.
- Domestic Freephone: Standard reverse charge voice services (from fixed lines) referenced in the submission. However, they are also used as support for other calling products such as Calling Cards.
- International Freephone: These are 1800 services leased to international carriers to provide a freephone service in Australia terminating in another country.

In recent years there has been a growing preference by businesses to use 13/1300 numbers (which are charged a Local Rate connection fee from a domestic fixed line) for voice calls, as these are more cost-effective for the providing organisation. This trend has seen significant growth in 13/ 1300 SIOs while the number of 1800 services (which are not charged a connection fee from a domestic fixed line) remains flat.

There are over 24 million mobile services in operation in Australia as at June 2009 with numbers forecast to exceed 25 million during 2010 representing market take-up of 110%–115% (compared to 8 million services in operation in June 2000). The following table gives an indication of the proportion of calls to FLRNs originating from mobile services.

Table 1. Mobile Originating % of FLRN voice calls (Mins)

MOU	1 Oct 2008 to 30 Sep 2009	1 Oct 2009 to 30 Sep 2010
13	18%	21%
1300	14%	16%
1800	12.5%	14.5%

This proportion is gradually increasing, consistent with changing consumer preferences.

7. Brief description of the arrangements supporting the provision of FLRNs, from a fixed-service and mobile-service perspective

The customer with a FLRN contracts with a Service Provider (the Global Number Service Deliverer in Attachment 1.) to manage the delivery of incoming calls to the customer. Typ-

ically the Service Provider translates the dialled FLRN into a local number and the call is then sent to the called customer's answer points. However, it is also possible to translate the dialled FLRN into a mobile number and direct the calls to a mobile service. The Service Provider may allow the customer to alter the answer point based on the time of day, or the origin of the call (e.g., for taxi companies or pizza makers operating across a range of geographic locations.)

The customer making a call to a FLRN can typically do so from any fixed or mobile telephone service. The fixed or mobile Service Provider (the Originating Access Service Deliverer or OASD in Attachment 1.) ensures that the call is delivered to the FLRN Service Deliverer. Some information may also be sent from a mobile network to the FLRN Service Deliverer to assist with any call routing based on the origin of the call. The technology used for the supply of these services typically requires that calls are switched through the network of the FLRN Service Deliverer.

Calls may travel across long distance networks if the caller is in one part of Australia and the FLRN Service Deliverer and the called customer are located elsewhere.

The competitive regime established in Australia enables supply by FLRN Service Deliverers that may be independent from the OASD and calls may be terminated via any local or mobile network. Only a small percentage of calls would originate on a single service provider's mobile network, utilise its FLRN infrastructure and terminate on its local network.

8. Generic description of the interconnect arrangements that support FLRNs

For 13 calls, the FLRN Service Provider obtains revenue from the called customer and may obtain interconnect revenue from any separate OASD based on call duration.

For 1800 calls, the FLRN Service Provider obtains revenue from the called customer and pays any separate fixed or mobile OASD an interconnect fee for delivering calls to it based on call duration.

For 1800 and 13 calls, the FLRN Service Provider must also pay any separate Terminating Access Service Deliverer a terminating access charge based on call duration.

Mobile service providers typically bill their calling customers for the cost of the mobile access component of the call and retain most or all of that revenue. This may include a flag fall and charge based on the length of the call. These charges may differ depending on whether the mobile service is pre-paid or post-paid, and depending on the plan the customer has chosen for their service.

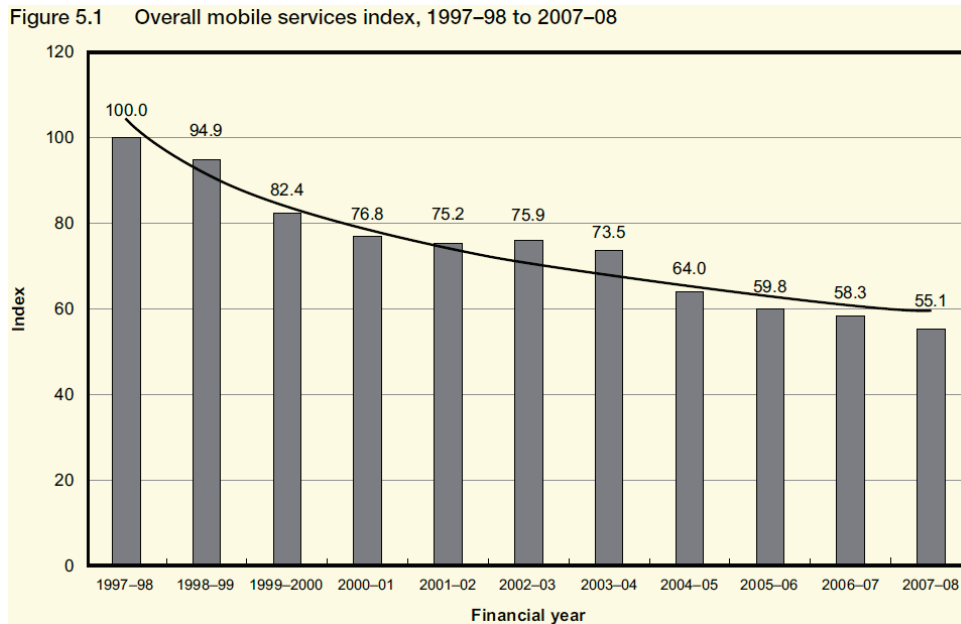
The net costs of carriage and interconnect fees are ultimately recovered by the FLRN Service Provider from the customer with the FLRN.

The mobile service provider has a contractual arrangement with the FLRN provider which covers the handover and commercial arrangements. The FLRN provider has a contract with the end customer being provided with the service.

9. Downward movement in average mobile phone charges in recent years and available consumer surplus from mobile services

It is worth noting that although the usage of mobile phones in Australia has increased dramatically over the past 10 years, the average cost of using mobile services has declined significantly over that time.

The following table, "Figure 5.1" from the ACCC report *Changes in prices paid for telecommunications services 2007-08*, illustrates the downward trend in prices for mobile services in the decade to 2007-08 (from a starting index of 100.0 down to 55.1). Prices for mobile services in Australia declined by 5.4% in 2007-08 alone.



In addition the ACMA is required to report on the consumer benefits attributable to various sectors of the telecommunications industry (section 105 of the *Telecommunications Act 1997*). Consumer surplus, as estimated by the ACMA, is a measure of the welfare that people gain from the consumption of telecommunications goods and services.

In 2008/ 09 consumer surplus attributed to the mobile sector increased by \$583m, which equated to \$493m for calls and \$92m for SMS/MMS.¹ The break-down of this overall figure reveals ~5% fall in prices for both mobile calls and SMS/ MMS combined with increases in quantity consumed of ~6% (calls) and ~17% (SMS/ MMS).

The ACMA's analysis and the ACCC data highlight the competitive nature of the mobile sector and the increasing value being delivered to consumers – a trend that is expected to continue.

10. ACCAN/ ACOSS/ AFCCRA Submission – Factual errors and unsubstantiated assertions

Section 2.1 – The submission says the Numbering Plan regulates charges. This is not correct. The Numbering Plan is not a price control instrument. Rather, it gives guidance on what numbers can be used with what services, based on service type and charging model used. Given this, the Numbering Plan reflects industry practice rather than leads it.

Section 2.6 – The submission asserts that because some providers zero-rate calls from mobiles to their own customer service 13/ 1300/ 1800 numbers, this proves that it can be done across the board. This is not necessarily so. A deeper understanding of the technicalities of FLRN services indicates that this is not a simple task, in particular, where multiple networks and services providers are involved in handling that call, which is a very different scenario to a customer calling only over their own provider's network.

¹ ACMA 2009 "Communications Report 2008-09" Chapter 7: Commonwealth of Australia.

Section 3.1 – “Box 2: Case study: Clients of the Northern Rivers Community Legal Centre”. In fact, call charges between Telstra pre-paid and say Telstra’s \$49 entry level cap plan are (basically) identical for 13 numbers (and standard national numbers). However, 1800 is different between pre- and post-paid Telstra plans. The claim of “Rural regions not having the benefit of competitive metro rates” is disingenuous, since costs of infrastructure/ back-haul are higher in regional areas and yet they still get the benefit of (Telstra’s) national based pricing.

Section 3.4 – The submission alleges possible double-dipping by Telco providers. This is fundamentally incorrect. The mobile service provider charges for their costs in originating the call (generally in the same way as for calling any other national number), while the FLRN provider charges for their costs in routing and terminating the call.

There are a number of assertions in the submission that may or may not be correct, given that they are unsubstantiated. These include:

- vulnerable people may go without access to important services;
- vulnerable people may go into debt because they have had to spend money paying for access to these services; and
- consumers are confused about pricing/ charging for these calls.

11. ACCAN/ ACOSS/ AFCCRA Submission – Comments on the “Potential Solutions” in Section 4

The following table, taken from the ACMA paper: *Numbering: Structure of Australia’s telephone numbering plan - Consultation paper number one*, lists the solutions suggested in the ACCAN/ ACOSS/ AFCCRA Submission.

Table 1 Proposals regarding charges for freephone and local rate calls from mobile phones

‘Regulatory reform’	The ACMA to change the existing obligation in the Numbering Plan, under which charges for calls to freephone and local rate numbers from most landline phones are limited, to apply it also to calls from mobile phones
‘Industry-led’	Carriage service providers supplying mobile services to voluntarily reduce their charges for calls to freephone and local rate numbers to the same level as calls from landline phones, consistent with current practice by several providers for calls to their customer support services
‘Technological’	The ACMA to create new freephone and local rate number ranges, for which charges for calls from mobile phones would be required to be at the same level as calls from landline phones

Regulatory reform – The Numbering Plan is only part of the overall framework involved in the supply arrangements for FLRN services and proposing changes by way of the Numbering Plan is not a useful way to lead reform. This misunderstands the role of the Plan, which has no specific pricing role in regard to mobile calling. If such a role was proposed, then this would take a number of years to implement given the interconnect arrangements and contracts between service providers that are currently in place. Further, changing the call charge arrangements for FLRNs may have the flow-on effect of increasing costs for other call types and any cost to change the model may result in overall higher costs to all consumers.

While it may be useful to clarify FLRN charging for consumers through an updated Numbering Plan, the ACMA is not an appropriate body to bring about changes in access or pricing.

Industry led reform - The discussion presented in the submission around this option is not particularly useful, since it misses the complexities of multiple networks and providers in-

volved in FLRN calling. However, it is true, that if this situation is going to be addressed, it will require industry to take a lead.

Technological change – This proposes a specific solution rather than considering who may lead change, which is the point of the previous two options. The submission correctly identifies that a new number range is a possible way forward but that there may be costs involved.

It needs to be recognised that the commercial, logistic and cost issues associated with this option are very significant. As previously indicated, there are likely to be more than 100 000 commercial contracts in potential need of re-negotiation in the event of a number range change (or indeed in the event of any substantive change to existing arrangements). Companies that have spent large sums promoting and generating commercial goodwill around existing FLRNs, including associated fixed and mobile signage, advertising and other marketing channels, are unlikely to readily warm to the notion of moving to a new number range. This would presumably include national crisis helplines such as Lifeline and Kids' Helpline.

In addition, the ACMA 'auctions' FLRNs via its Smartnumbers website. Any attempt to introduce a new number range, with similar market usage, may result in the purchasers of FLRNs seeking compensation as this may dilute their investment.

12. The ACMA paper: Numbering: Structure of Australia's telephone numbering plan - Consultation paper number one

The following questions relating to FLRNs and in particular the issue raised by the consumer groups are posed in the ACMA paper.

Question 1

What purpose is now served by:

- > A distinction between freephone and local rate numbers?
- > The continuation of freephone numbers?
- > The continuation of local rate numbers?

Question 2

To what extent is there a problem with affordability and clarity of charges for calls to freephone and local rate numbers from mobile phones? In what ways is the problem manifested, and how extensive is it?

Question 3

To the extent there is a need to address the affordability of calls to freephone and local rate numbers from mobile phones, how should this be done? To what extent is each of the proposals in Table 1 feasible?

Response - See Section 10 above.

13. Broader communications trends

Telecommunications services for businesses/ organisations to enable convenient access by customers/ clients have undergone changes over the years. For example, 008 evolved into 1800 to provide one-stop (national) numbers that provide customers convenient access and avoids the service provider having to promote multiple geographic numbers.

While large numbers of customers now use mobiles for their regular calling, both consumers and community service providers currently use a range of communications options, including:

- making FLRN calls from a payphone, or other fixed type service;
- informal "call-back" arrangements;
- use of services that allow the customer to send a SMS to a community service provider, or government agency who will then call them back; and
- dedicated websites and/ or pages on social network websites.

The diversity of communications methods will only increase in the future. Governments have foreshadowed increasing engagement with the community via accessible websites and already today community service providers are engaging with their customers via new media such as social networks (e.g. facebook) as well as their own websites. These models allow low cost access to services through online text and/ or voice dialogue.

Examples

The Brotherhood of St Laurence "... recently established a 1300 SMS option for participants of its Saver Plus program. The SMS option allows a staff member to call the client back. This relatively inexpensive initiative improved access to the program for those without a fixed line phone" (Submission to ACMA's Reconnecting the Customer consultation, September 2010, p.10).

The Inspire Foundation, through its www.au.reachout.com initiative, has been using the Internet to engage with young people who are at risk since 1998. It notes that "90% of young people aged 18-24, and 92% of 15-17 year olds, are utilising the Internet, and after family and friends, it's where young people turn for advice and support in difficult times ... With its unique ability to connect people to information and each other, the Internet offers opportunities to engage the 71% of young people experiencing mental health problems who are not currently seeking professional help" (www.inspire.org.au/how-we-work.html).

In South Korea more than 50% of the population already use e-Government services to conduct their personal business with Government agencies, and more than 1500 Government forms are now issued online (up from only 28 forms in 2008).

In addition, the pre-election ALP mental health fact sheet states:

Boosting the capacity of crisis hotlines, including Lifeline (\$18.1m)

Funding will be provided to Lifeline Australia to increase the capacity of their support hotlines. Lifeline currently receives around 450,000 per year. Almost 6 per cent of these calls involve a high risk of suicide. Labor's additional funding will enable Lifeline to increase their call capacity by around 60 per cent – to around 700,000 – over time.

Labor's 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.

Lifeline will also be provided with funding to establish dedicated lines at suicide 'hotspots' – so that people who are actively contemplating suicide and have taken the step of going to a destination where they could commit suicide, have help at hand.

FLRN services are therefore only one communications channel being used by community service providers to serve their clients. The broader question of how these community agencies wish to engage with their diverse communities requires consultation with them:

something the telecommunications industry does as a matter of course in seeking to provide effective commercial solutions to their needs.

14. Situation Status as at December 2010

As outlined in this paper, the issue that has been highlighted around the cost of accessing FLRNs from mobile handsets is one that has arisen through historical factors and the changing patterns of communications usage in Australia during the past 20 years. This issue is not the result of any improper or unethical behaviour on the part of any service provider.

The issue is complex and involves a matrix of many stakeholders.

If there is, in fact, a "problem" to be "fixed" it should be clear from this paper that there is no single or simple solution that can be easily implemented by regulators or by industry.

The industry working group that has prepared this paper under the Communications Alliance umbrella is engaged to continue examining the issues and to work with the key stakeholders to ensure that any initiatives that may be undertaken in future are practicable and will achieve their intended outcomes.

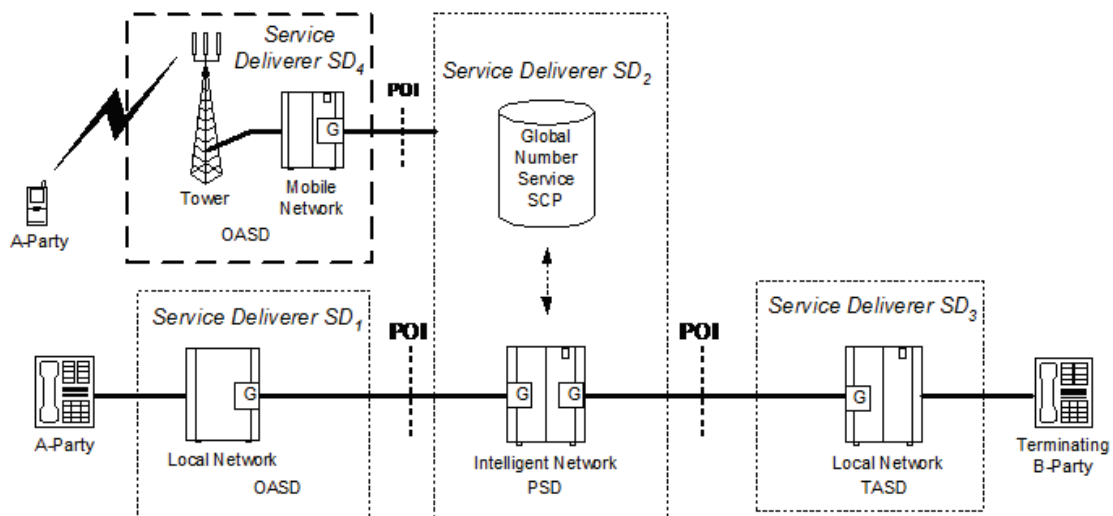
Attachment 1. – Call routing and interconnection for FLRNs

Example (d): Global Number Services 13, 1300, 1800, 180x With Number Portability

In this scenario, a call to the global number service is routed (by reference to a local copy of the national reference database for number allocations to SDs) to SD₂, the provider of this particular global number service. The identity of SD₂ is determined by analysis of the complete dialled number. The call may originate on a fixed network, SD₁ or mobile network SD₄.

SD₂ uses its Service Control Point database to translate the dialled global number to a geographic network terminating number N_G, corresponding to the terminating B-Party number.

SD₂ then routes the call to the Terminating Access Service Deliverer SD₃ identified by the B-Party number.



Principle	Status of Parties	Interconnection Responsibilities
G15	CC = B-Party	G3: SD ₂ as PSD is accountable to the B-Party for the performance of the call.
G3	PSD = SD ₂	
G5	SSDs are OASD = SD ₁ or OASD = SD ₄ and TASD = SD ₃	

Key to Acronyms:

- CC = Commissioning Customer
- G = Gateway Function
- OASD = Originating Access SD
- POI = Point of Interconnection
- PSD = Primary SD
- SD = Service Deliver
- SSD = Supporting SD
- TASD = Terminating Access SD

G15: The PSD hands over the call to the TASD nearest to the B-party location, unless otherwise agreed between the SDs.

Attachment 2. – INMS Subscribers

13/1300/1800 Number Subscribers:

	COMPANY NAME	ID CODE	CAC CODE
1.	Paradigm.One Pty Ltd	PDO	NA
2.	AAPT Ltd	AAP	1414
3.	Optus Networks Pty Ltd	OPT	1456
4.	Telstra Corporation Ltd	TEL	1411
5.	Powertel Limited	SPG	1474
6.	Primus Telecommunications Pty Ltd	PRI	1466
7.	Zintel Communications Pty Ltd	SMI	NA
8.	GoTalk Limited	FLO	1434
9.	Soul Pattinson Telecommunications P/L	IPT	1423
10.	Pivotal Group Pty Ltd	GOS	NA
11.	1300 Words Pty Ltd	WRD	NA
12.	Dow Telecom Pty Ltd	DOW	NA
13.	OzeTel Pty Ltd	OZE	NA
14.	Macquarie Corporate Telecommunications P/L	MAC	NA
15.	MagicMotion P/L t/a Callstream	MGZ	NA
16.	Jet Interactive Pty Ltd	JET	NA
17.	Agile Pty Ltd	AGL	1464

NA = Not applicable, subscriber has nil number allocation.

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