



07 July 2017

To Whom It May Concern

**Re: DR C555:2017 Integrated Public Number Database**

ACCAN thanks Communications Alliance for the opportunity to provide comments on the draft Industry Code DR C555:2017 *Integrated Public Number Database* (the Code) and on the draft Guidelines DR G619:2017 IPND Data.

ACCAN is the peak body that represents all consumers on communications issues including telecommunications, broadband and emerging new services. ACCAN works to represent the views of its diverse membership base to policy-makers, government and industry to get better outcomes for all communications consumers.

ACCAN is satisfied that the 2017 revision of the Code works to address the recommendations that came out of the Department of Communications and the Arts' 2015 IPND Review, and that it will improve the efficiency and transparency of the IPND scheme both for industry and for consumers.

As a subject matter expert in privacy laws and the IPND, ACCAN board member Nigel Waters represented ACCAN on the Code Working Group. His and ACCAN's view is that the revised Code has improved provisions relating to the technical processes for provisioning the IPND, therefore improving data quality.

ACCAN is particularly pleased to see that the reference to the Privacy Act 'subject access' obligation of the IPND Manager has not been removed from the Code. The revised access section of the Code (section 5.2) deals with the routine process of a customer gaining access to their IPND data via their carriage service provider, which is promoted in the Code as the usual access method for customers. ACCAN's position throughout the review process was that omitting the reference to the IPND Manager would imply that an individual could not also request access direct from the IPND Manager.

ACCAN acknowledges that there are practical issues for the IPND Manager in responding to direct access requests, as they do not have adequate identity verification processes in place and risk disclosing customer information inappropriately. However, ACCAN maintains that asserting that the only way for an individual to access their data is via their carriage service provider would not be appropriate.

Australian Communications Consumer Action Network (ACCAN)  
*Australia's peak body representing communications consumers*

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Thank you again for the opportunity to provide feedback on the Code, and for involving ACCAN in the revision process. Please do not hesitate to get in touch should you have any questions.

Yours Sincerely

A handwritten signature in black ink that reads "Jeremy Riddle".

Jeremy Riddle  
Policy Officer

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