



# **C518:2006 Call Charging and Billing Accuracy Code**

Submission by the Australian Communications Consumer Action  
Network to Communications Alliance

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

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## **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

ACCAN thanks Communications Alliance for the opportunity to provide feedback on C518:2006 Call Charging and Billing Accuracy Code (C518). While this Code as currently written may have declining applicability, ACCAN considers there is a strong need to retain the underlying principles offered by this Code at an enforceable level and to amend and update the Code to cover current technology and future innovation.

Updating and maintaining the Code would not only demonstrate best practice within the industry, it would also instil greater confidence in telecommunications consumers through marketing the tools used by providers to test for accuracy. Given current consumer dissatisfaction with billing, ACCAN sees this as an important step in building the confidence consumers have in industry.

### Importance of billing accuracy for customers

This is an important consultation, because consumers care greatly about billing and call charge accuracy and must have high confidence and trust that there are processes in place to support this. We are not confident that such arrangements are currently adequate.

The Telecommunications Industry Ombudsman (TIO) 2017 Annual Report<sup>1</sup> shows billing and payments were the second-most complained about issue in the 2016-17 financial year. Of the 158,016 complaints received, 66,142, or 41.9%, related to billing and payments. From a consumer standpoint, this data indicates a need for improved billing accuracy.

A recent example also illustrates that billing accuracy remains a significant concern. In December 2017 it was widely reported that Belong overcharged many of its customers up to **three** times the value of their monthly bill via its direct debit billing system<sup>2</sup>. This has left many consumers incredibly frustrated and some unable to meet deadlines to pay other bills. ACCAN considers that while incidents of incorrect billing on this scale are infrequent, the underlying approach and principles in C518 that standardise consistent testing are vitally important.

This example and TIO complaints data suggest that rather than deregistering the Code, there are compelling reasons for its revision to address current consumer detriment, and build on the trust and customer confidence that currently exists. Consumers need and deserve a safeguard that protects them from inaccurate call charging and billing for essential communications services, and sets a benchmark for how providers ensure charging accuracy.

### TCP Code and Call Charging and Billing Accuracy Code

Whilst the TCP Code includes a general reference for providers to 'verify and demonstrate, Billing Accuracy'<sup>3</sup>, this provision lacks detail. Furthermore, it does not include important elements of C518

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<sup>1</sup> TIO 2017, 2016-2017 Annual Report: [https://www.tio.com.au/\\_data/assets/pdf\\_file/0018/250911/Telecommunications-Industry-Ombudsman-Annual-Report-2017.pdf](https://www.tio.com.au/_data/assets/pdf_file/0018/250911/Telecommunications-Industry-Ombudsman-Annual-Report-2017.pdf), p. 29.

<sup>2</sup> Choice 2017, 'Put the money back so I can pay my landlord' customers to Telstra's Belong: <https://www.choice.com.au/electronics-and-technology/internet/connecting-to-the-internet/articles/belong-treble-debits-customers-outrage-011217>

<sup>3</sup> Communications Alliance 2015, Telecommunications Consumer Protections Code, 5.5.1, p.42

which are designed to allow for monitoring of this fundamentally important area. These elements include:

- The requirements for providers to have a test plan
- Overall performance indicators for sample accuracy testing
- Frequency of testing requirements
- Compliance and self- attestation requirements for billing accuracy

These elements are needed to support testing regimes across providers, and to drive consistently high industry practice.

We also note that the demands of a competitive telecommunications industry have generated a market for new solutions for testing call charging and billing accuracy. While this diversification is welcome, there is a need for conformity to independent performance benchmarks and standardised accuracy parameters for both providers and customers. This can be delivered through a revised Code.

### **Amending the Code**

Issues with C518 are of a definitional nature, rather than relating to the underlying principles and protections offered to consumers. ACCAN considers C518 should be revised to allow for its applicability to contemporary communications usage and accuracy testing methods.

#### *Scope*

ACCAN considers the scope of the Code should be adjusted to cover timed voice, text and data services. Billing accuracy is important for customers using all these services, on which the community is increasingly dependent for daily transactions.

For voice services, to avoid any ambiguity, the scope of the Code should be updated to cover fixed and mobile services beyond those that are circuit switched and allow for testing methods other than PSTN Test Call equipment.

However, even as currently worded, ACCAN considers the Code may have broader applicability than to circuit switched network voice services, as relates to Standard Telephone Services, similarly to C519. The definition of STS as set out in legislation does not preclude it from relating to telephony services that are provided over an IP-enabled network<sup>4</sup>. Even where the access portion of a telephone service uses IP technologies, such services are still part of the PSTN (Public Switched Telephone Network). The PSTN is not constrained to the subset of circuit-switched technologies, but instead is formed from all telephone services that can be switched between multiple providers such that any-to-any connectivity can be established. IP-enabled telephone services, including cellular mobile services, are still part of the PSTN so long as they can call another service, irrespective of underlying technology.

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<sup>4</sup> Department of Communications, Information and the Arts, Examination of Policy and Regulation Relating to Voice over Internet Protocol (VoIP) Services: Report to the Minister for Communications Technology and the Arts, November 2005, p.19.

## Consumer Safeguards and Customer Trust

ACCAN considers that ensuring call charging and billing accuracy is a vital consumer safeguard in the telecommunications environment. The amount that consumers pay for their telecommunications products and services is key in determining the types of telecommunications services a consumer can use. Consumers rely on being provided with accurate information regarding their billing and the charges applied, and place considerable trust in their provider to get this right. Further, an incorrect bill or call charge could be the difference between a consumer being able to pay other important bills, such as energy, food or rent. Many consumers have little flexibility to absorb over-charging. 62% of respondents surveyed by SACOSS in 2016 had difficulty paying their telecommunications bills, or had to cut back on usage for financial reasons in the previous year.<sup>5</sup>

Given this, ACCAN considers the deregistration of C518 would be harmful to telecommunications consumers as it would remove the assurance that providers are not overcharging for calls and are not issuing incorrect bills to their customers. The Code notes that the 'Anticipated Benefits to Consumers' are to assure:

*... 'customers, Regulators and Government that Carriers and CSPs provide an acceptable level of overall accuracy in the calculation of call charges. The Code is intended to give customers confidence that call charging and billing is correct.'*

Without a revised Code in place, there is no guarantee for consumers that the charges they incur for using their telecommunications services are accurate or that there are appropriate measures in place to correct inaccurate charges or bills. As such, ACCAN considers it important to retain the principles of this Code at an enforceable level by updating the Code to ensure its currency now and into the future. We consider there a need for more performance metrics, not less.

Communications Alliance notes that call charging audit systems and processes are adequate in producing satisfactory results. ACCAN believes that despite satisfactory results these systems and processes still need to be standardised through an enforceable code. C518 provides a tool box that enables regulatory oversight to promote accuracy before problems arise, rather than after. ACCAN sees this proactive obligation regarding testing of call charges and billing accuracy as a necessary component in providing quality consumer protection. Without enforceable systems and processes in place to promote call charging and billing accuracy, consumer confidence will further diminish and complaints about billing would be likely to rise.

## Conclusion

Deregistering C518 would undermine the importance of call charging and billing accuracy in the telecommunications industry and the reliance that consumers place on such accuracy. Instead there is a need to update the Code to extend to the current underlying technology, and more importantly to future-proof it for further innovation.

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<sup>5</sup> ACCAN & SACOSS 2016, Connectivity Costs: <http://accan.org.au/our-work/research/1257-connectivity-costs>, p.15