

**Do Not Call Discussion Paper Submissions
Department of Communications,
Information Technology and the Arts
GPO Box 2154
CANBERRA ACT 2601**

Attention: Ms Tara Morice



Dear Ms Morice,

Attached please find ACIF submission in response to the Departmental discussion paper on the possible establishment of a national do not call register.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'A.C. Hurley', with a stylized flourish at the end.

Anne Hurley
Chief Executive Officer
Australian Communications Industry Forum (ACIF)

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Introduction of a Do Not Call Register – Possible Australian model

Submission by ACIF

ACIF is pleased to make this submission in response to the Department's Discussion Paper on 'Introduction of a Do Not Call Register – Possible Australian model'.

This submission addresses only the issue of administration of a Do Not Call register. It does not address the questions of whether there should be a Do Not Call register or any matters related to a proposed model of register as these are not matters appropriate for comment by ACIF.

The Discussion Paper advances as a possible approach in the administration of a Register that (1) ACMA would be responsible for enforcement of the legislation relating to a register, and (2) ACMA could tender out the administration function 'to organisations that have experience and background in the operation of database registers.'

The purpose of this submission is to indicate ACIF's likely interest in tendering for the operation of a Do Not Call register: in the event that the Government were to make the decision to implement a Do Not Call register and adopt the approach of ACMA tendering for the administration function of the register - ACIF is well-placed to tender for consideration as the operator of the register. Whether ACIF would indeed tender would of course be subject to the terms of any tender and consequent Board approval to proceed.

Infrastructure to support a Do Not Call Register

In partnership with Paradigm.One, ACIF has developed infrastructure called the Electronic Information Exchange ('EIE') which enables business-to-business e-commerce systems. The topography of EIE allows both centralised and decentralised applications to be deployed or even applications that are a combination of both.

The EIE infrastructure is ideally suited for a centralised registry-type application such as a Do Not Call Register. Currently the industry uses EIE for a number of similar systems, notably the AMTA IMEI Lost and Stolen Register and the MCF Radio Frequency National Site Archive.

Significant investment has already been made in EIE infrastructure with the aim of streamlining the effort and costs involved in bringing on new applications. Therefore the deployment of a new application such as a Do Not Call Register would not involve significant initial and ongoing costs, and can be done in a reasonable timeframe with less risk. Instead of procuring the infrastructure which would be needed to support a Register from vendors (incurring costs and possible time delays) existing EIE spare infrastructure capacity can be utilised at a fraction of the effort and cost.

About ACIF

ACIF is a member-funded organisation established in 1997 to facilitate communications self-regulation in the interests of both industry and consumers. Its membership comprises carriers/carriage service providers, business and residential consumer groups, industry associations and individual companies.

ACIF operates on the central premise that the best outcomes for all stakeholders in Australian telecommunications can be achieved by co-operation, obviating the need for government regulation.

16 December 2005