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REGULATION TASKFORCE SUBMISSION
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1. Executive summary

The telecommunications industry has, since 1997, operated in a regulatory framework which has as its objective the maximum use of industry self-regulation without imposing undue cost on suppliers.

Whilst using the term 'self-regulation', the framework is not true self-regulation as defined by the Taskforce, but rather co-regulation.

The scheme of co-regulation has been successful – it has pushed accountability to industry for developing rules, saved costs for Government and developed significant protections.

But compliance with the framework, both in terms of complying with the requirements for developing codes and standards and in terms of complying with the codes/rules it develops, is a high cost for industry: when the labour costs, compliance costs, institutional-support costs, as well as regulatory costs are considered, the framework has not been a 'cheap option' for industry and has not come without associated regulatory burdens and compliance costs.

It is submitted that there is scope for reviewing the current framework with a view to reducing costs associated with aspects of the co-regulatory framework and moving towards a more self-regulatory framework for the telecommunications industry.

2. Introduction

2.1 Scope of this submission

The telecommunications industry is impacted by regulations contained in a number of different Acts and legislative instruments. Submissions from telecommunications industry participants will undoubtedly cover the regulatory compliance burden which the whole spectrum of regulations imposes. This ACIF submission is concerned with the framework established under the *Telecommunications Act 1997* for 'the maximum use of industry self-regulation' and the industry experience in implementing the framework. Reference is made to compliance requirements flowing from other legislative instruments which supplement the 'maximum self-regulation' provisions in the Act in order to demonstrate where duplication and additional cost occurs – however, the submission does not attempt to be comprehensive of all regulation imposed on members of the telecommunications industry.¹

¹ In particular, this submission does not include the framework for competition policy in the telecommunications industry, nor any specific regulatory requirements imposed on the incumbent operator Telstra.

2.2 Definition of 'regulation', 'self-regulation' and 'quasi or co-regulation'

The Taskforce defines regulation to include 'any laws or other government 'rules' which influence or control the way people and business behave. Under this definition, regulation is not limited to legislation and formal regulations; it also includes 'quasi-regulation' (such as codes of conduct, advisory instruments or notes etc).'

The Issues Paper defines the spectrum of regulatory actions as:

- No regulation (that is, rely on the market in conjunction with existing laws)
- Self-regulation (such as a code of practice initiated and enforced purely by industry)
- Quasi-regulation and co-regulation (involving different degrees of both industry and government initiation and enforcement)
- Pure government regulation (involving explicit 'black letter' law)

Therefore, when the Issues Paper is asking the question whether 'industry self-regulation' may be an alternative mechanism for achieving a policy objective with a lower compliance cost – the model referred to is that where 'a code of practice is initiated and enforced purely by the industry'. Quasi-regulation and co-regulation are, for the purposes of the Issues Paper, included in the same category as pure government regulation.

The telecommunications industry is commonly described as being 'self-regulatory'. However, the more correct description, and which aligns with the Taskforce's spectrum of action definitions, would be 'quasi or co-regulation'. This is fundamentally because, under the scheme in the *Telecommunications Act 1997* ('the Act'), the initiatives developed by industry in the form of Industry Codes are ultimately enforceable by the regulator, the Australian Communications and Media Authority (ACMA). The industry does not solely initiate and enforce its own codes of practice within the definition of 'self-regulation' in the Issues Paper.

Whilst it is not generally helpful to get bogged down in labels or semantics, the distinction between 'self-regulation' and 'co-regulation' is important for the purposes of this exercise.

On the basis of the definitions in the Issues Paper, this submission is premised on the categorisation of the regulation of telecommunications under the Act as 'quasi' or 'co-regulation.'

2.3 Objectives of the Regulation Taskforce

The objectives identified in the Taskforce Issues Paper are to:

- assist the Taskforce identify priorities for immediate action and ways forward in areas that require further work;

- reduce the regulatory compliance burden on business, rather than to reduce regulation per se;
- seek information and evidence as to why regulation may impose an unnecessary and avoidable burden on business – eg requiring the submission of records or reports that are not necessary for attaining the regulation’s goals, or requiring business to undertake certain activities that are not necessary for attaining the regulation’s goals;
- assess whether the policy goals underlying the regulation could be achieved in a way that does not impose as high a burden on business – eg government information campaigns or industry self-regulation?

The experience of ACIF’s operations over 8 years provide valuable material on the benefits, costs and burdens to the telecommunications industry associated with a legislated co-regulatory environment.

In terms of the objectives of the Taskforce, the question is not whether this environment is a lower-cost option than government regulation, because both models are grouped together for the purposes of this exercise. The question is whether the objectives of the *Telecommunications Act 1997* could be achieved with a true self-regulatory, rather than a co-regulatory, mandate? ²

3. Overview of the regulatory framework for ‘the maximum use of industry self-regulation’ under the *Telecommunications Act 1997*

The main object of the *Telecommunications Act 1997* (‘the Act’), read together with Parts XIB and XIC of the *Trade Practices Act 1974*, is to provide a regulatory framework that promotes:

- (a) the long term interests of end users; and
- (b) the efficiency and international competitiveness of the Australian telecommunications industry (subsection 3(1)).

Other major objects include:

- promoting the supply of diverse and innovative carriage services and content services (para 3(2)(c))
- promoting the development of an Australian telecommunications industry that is efficient, competitive and responsive to the needs of the Australian community (paragraph 3(2)(d))

² It should be noted that there is little quantitative measure of the benefits and costs of the regime established in 1997: benchmarks were not established in 1997 by which to measure the outcomes of the ‘maximum self-regulation’ regime nor have extensive records of financial costs and impacts been developed.

- promoting the effective participation by all sectors of the Australian telecommunications industry in markets (whether in Australia or elsewhere) (para 3(2)(e))
- appropriate community safeguards in relation to telecommunications activities and to regulate adequately participants in sections of the Australian telecommunications industry (paragraph 3(2)(h))
- to promote responsible practices in relation to the sending of commercial electronic messages (para 3(2)(j)).

As already noted, the Act is often described as establishing a self-regulatory environment. In fact, though the word 'self-regulation' is used in the Act and throughout Explanatory Memorandum, the framework which was established and subsequently implemented more correctly matches the description of the Taskforce's 'Quasi or co-regulation'.

The policy intent of the Act is set out in section 4:

The Parliament intends that telecommunications be regulated in a manner that:

- (a) promotes the greatest practicable use of industry self-regulation; and
- (b) does not impose undue financial and administrative burdens on participants in the Australian telecommunications industry; but does not compromise the effectiveness of regulation in achieving the objects mentioned in section 3.

Part 6 of the Act contains a comprehensive scheme for the development and registration of Industry Codes, including examples of consumer protection matters which could be included in codes.

The Act provides for registration of codes with ACMA (s 136). Compliance with codes developed and registered under Part 6 is voluntary, unless the ACA gives a direction to comply under s 121. ACMA may take action in the Federal Court for a pecuniary penalty for failure to comply with the direction (s 121). ACMA also has the power to give formal warnings for contravention of codes (s 122).

There are currently 26 codes on the ACMA register, 24 of which have been developed by ACIF. In respect of formal warnings issued for contravention of codes, ACMA gave 2 formal warnings to mobile carriers in 2004 and 1 direction under s 121 in 2004. There have been no instances of ACMA taking Federal Court action.

Additionally, the regulator has 'reserve powers' to determine an 'industry standard' in certain circumstances, including when a code is deemed deficient (s 123). The regulator has similar enforcement powers with respect to industry standards as it does with codes ie to direct compliance and take action in the Federal Court for failure to comply with the direction (s 128), and to give formal warnings for contravention.

There have been no instances of ACMA determining an 'industry standard' to replace a code which it deemed deficient. ACMA is currently in the process of developing a standard in respect of the Integrated Public Number Database, however, the process has not yet been completed.

Section 376 confers on ACMA the power to make a technical standard relating to specified customer equipment or specified customer cabling. Under s 377, ACMA may apply, adopt or incorporate a standard made by another industry association which will satisfy its obligation to 'make a technical standard'.

In its review of the telecommunications regulatory framework in 2001, the Productivity Commission noted the main reason for the emphasis on the model of industry self-regulation as provided for in the Act as:

*'...spring[ing] from the fact that the changing nature of telecommunications technology and its complexity make it difficult for any government agency to devise appropriate standards. Further, the potential costs to the industry from regulatory error are very high. However, the interests of industry players are not always aligned with those of the wider public, and provision for a regulatory backstop is an important safeguard.'*³

In addition to the provisions of Part 6, ACMA has power to make service provider determinations under s 99 setting out rules with which service providers must comply.

ACMA has utilised its power under s 99 to make determinations related to the delivery of 'premium services'. The most significant example of this is the Mobile Premium Services Service Provider Determination made in June 2005, which sets out rules relating to the provision of mobile premium services and requires the development of a 'self-regulatory scheme' meeting certain specified criteria. This is further discussed in section 5.3 below.

Under s 105, ACMA also has a reporting function on industry compliance with codes.

4. Implementation of the 1997 framework

4.1 Australian Communications Industry Forum

The telecommunications industry established a separate industry association - the Australian Communications Industry Forum (ACIF) - to implement and manage 'maximum self-regulation' as defined in the Act. ACIF was established by the industry to be the body responsible for the development of codes and technical standards under the Act.

³ Productivity Commission 'Telecommunications Competition Regulation' pp 443-444

*'The underlying rationale for standards and codes in the realm of telecommunications comprises a multitude of objectives. Standards and codes are there to address health and safety issues, to safeguard consumer interests, to assist industry development and competitiveness, and to facilitate gains from network externalities. These objectives are mirrored in the legislation.'*⁴

ACIF's corporate vision when it was established was to be "The communication industry's peak body, leading the delivery of best practice in industry self-regulation". Its membership includes carriers, carriage service providers, industry and consumer associations. Funding for ACIF's activities comes from the membership fees paid.

Since its inception, the ACIF has developed over 120 documents, comprising Industry Codes, Technical Standards, and supplementary and supporting documents. The documents contain industry rules for:

- inter-operator arrangements to support the competitive environment (eg ACIF C570:2005 Mobile Number Portability; ACIF C559:2005 Unconditioned Local Loop Service (ULLS) Network Deployment Rules)
- network performance (eg ACIF C519:2004 End-to-End Network Performance for the Standard Telephone Service)
- consumer protection (eg ACIF C521:2004 Customer Information on Prices, Terms and Conditions)
- consumer equipment health and safety standards (eg AS/ACIF S004 Voice frequency performance requirements for Customer Equipment)
- cabling standards (eg AS/ACIF S009:2001 Installation requirements for customer cabling (Wiring Rules)).

Attachment A contains the ACIF Consolidated List of Publications.

All industry stakeholders participate in the development of ACIF rules as relevant to the particular issue – therefore a Working Committee to develop a particular Code could typically include representatives from carriers, carriage service providers, ACMA, the TIO, consumer associations.

Codes and Standards are developed in accordance with ACIF's operating rules, with the fundamental principles being openness, transparency, inclusion and consensus.

For Codes which are to be registered with ACMA, the requirements of Code development as set out in the ACA publication *'Developing Telecommunications Codes for Registration – a Guide'* must be met.

Also relevant is s 120 of the Act, which requires that codes once registered may not be varied – they may only be replaced with a revised Code.

⁴ Productivity Commission p 444

ACIF itself is a small organisation comprising a CEO and 8 staff. The development of ACIF's documents is done through the voluntary labour of industry stakeholders, with administration and management provided by the ACIF staff.

In addition to the development of formal documented rules, ACIF provides leadership to the industry to pro-actively identify industry-led initiatives for the new and emerging technologies such as Voice over Internet Protocol (VoIP). These technologies are challenging existing networks and services and provide the opportunity for industry to demonstrate its maturity in implementing self-regulatory initiatives in ways other than prescribing rules in codes and standards. For example, ACIF has brought together industry stakeholders in a number of forums, and has developed Fact Sheets to guide VoIP providers in the information to be provided to consumers. More information is available on the ACIF website at www.acif.org.au.

Has the ACIF model been successful in implementing the policy object of the Act? Whilst there are no performance benchmarks to point to, the Productivity Commission did conclude in 2001:

'It seems reasonable to conclude that, despite the tensions that are inevitable in an organisation as widely representative as the ACIF and despite some shortcomings as discussed above, industry self-regulation is achieving some success. Nevertheless, cooperation with regulatory agencies and the safeguard mechanisms are still required at this stage'.⁵

4.2 The ACIF Code Administration and Compliance Scheme

The maturity of the Australian communications industry will be judged by its ability to keep its own affairs in order, in particular to comply with – and demonstrate compliance with – the rules which it develops.

As part of this commitment, ACIF has in place a Code Administration and Compliance Scheme that allows a carrier or carriage service provider to formally sign-up to (commit to comply with) an ACIF Industry Code under the ACIF Code Administration and Compliance Scheme.

Attachment B contains the current list of signed-up members to specific codes.

The monitoring of compliance of industry with ACIF Codes is currently undertaken by ACIF itself, ACMA (under s 105 of the Act), the TIO (pursuant to s 114 of the Act) and to some extent by the ACCC.

5. Other relevant components in the operation of the 'maximum self-regulation' framework

⁵ P 442

5.1 The Australian Communications and Media Authority

The role of ACMA is significant in the framework. This submission has already included references to its role in the development, enforcement and monitoring of Codes and standards, but for further clarity they are covered below.

- S 118: ACMA can request a Code be developed. The intention is to 'encourage' self-regulatory responses, but experience suggests it has also been used as a directive power
- S 122: ACMA may give a formal warning to comply with an industry code. Section 129 confers similar powers in respect of industry standards.
- S 121: ACMA may give a direction to comply with an industry code and may bring an action in the Federal Court for a pecuniary penalty of up to \$250,000 for a failure to comply with the direction. Section 128 confers similar powers in respect of industry standards.
- S 123: ACMA has a reserve power to make an industry standard in circumstances including failure to comply with a s 118 request, failure to meet indicative targets, or that ACMA considers it is necessary or convenient to make a standard in order to provide appropriate community safeguards or otherwise regulate industry participants.
- S 105: ACMA is required to report annually to the Minister on a number of matters which requires it to obtain reports from the industry – specifically in relation to the adequacy of carrier/carriage service provider compliance with obligations under Part 6, and the adequacy of their compliance with codes registered under Part 6 and standards determined under Part 6.
- S 136: ACMA maintains the register of industry codes and standards.
- S 99: ACMA may make service provider determinations.

Funding for ACMA comes largely from the carrier licence fees paid by carriers.

5.2 The TIO Scheme

The Telecommunications Industry Ombudsman is established under the *Telecommunications (Consumer Protection and Service Standards) Act 1999* as an independent complaints handling and dispute resolution body.

The TIO is an industry-sponsored and funded cost recovery scheme, deriving its funding solely from Members who are charged fees for complaint resolution services provided by the TIO.

Under s 114 of the *Telecommunications Act 1997*, an industry code may confer functions on the TIO, in which case the TIO will accept complaints related to potential breaches of ACIF industry codes.

The TIO explains its role in respect of Code compliance as follows on its website:

The TIO's investigative staff will consider whether a Code rule has been breached each and every time they address a complaint. The TIO has a responsibility to consider compliance with Codes in the following areas:

- Billing
- Credit Management
- Complaint Handling
- Information given to customers on Prices, Terms and Conditions
- Customer Transfer
- Privacy (including calling number display)
- Mobile Number Portability

Wherever there is the potential for a breach of a Code rule to be established, this fact will be noted and the matter recorded and reported as a possible code breach. The TIO uses industry Codes as benchmarks of industry practice, and so we do this regardless of whether or not you are a signatory to the Code.

If we subsequently escalate the complaint to Level 2 or Level 3, we will advise you of the specific Code rule that we believe that you have breached.'

5.3 The TISSC Scheme

TISSC (Telephone Information Services Standards Council) is an independent regulatory body that sets fair standards for the message content and advertising of any Australian telecommunication service with the prefix 190, in the form of a Code of Practice. Service providers of 190 numbers must abide by the Code of Practice which is developed by TISSC.

The TISSC Code of Practice has been revised and is currently seeking public comment. The revisions include a number of obligations which the Mobile Premium Services Service Provider Determination 2005 requires to be included in the 'self-regulatory framework'. Additionally, under the self-regulatory scheme, TISSC will be assuming a role as the escalated complaints-handling body for mobile premium services.

The funding for this additional role will presumably be provided by those providing the services.

5.4 Rules in other legislation

In addition to the rules which are set for telecommunications service providers under the *Telecommunications Act 1997* framework, the service providers must comply with the requirements of other applicable legislation such as the *Trade Practices Act 1974* and the Fair Trading laws of the various State.

In some instances there is overlap – for example, the *Trade Practices Act 1974* and the *ACIF Prices, Terms and Conditions Code*; the *ACIF Consumer Contracts Code* and the Victorian Unfair Terms legislation.

6. The estimated cost to implement and comply with the framework under the 1997 Act and the associated relevant requirements

The Taskforce is concerned with the compliance cost of regulation. From ACIF's perspective there are 2 categories of compliance cost which are relevant for consideration:

- (1) The costs of to comply with the Part 6 focus on the development of codes and standards.

The costs of to comply with the Part 6 focus on the development of codes and standards as the predominant plank of the 'maximum self-regulation' framework has been very high since 1997, particularly the cost of industry labour devoted voluntarily to the task.

As noted, ACIF has developed more than 120 documents under the Part 6 regime covering technical and operational areas and consumer protections. The cost of developing the suite of Codes, standards and documents has never been fully documented. However, a conservative costing of the recently-developed Consumer Contracts Code estimated a development cost of more than half a million dollars – covering money actually expended by ACIF on drafting, chairing, consumer input and the putative cost of the labour of all members of the Working Committee in attending meetings. The figure does not cover the costs which all members of the Working Committee incurred in their own organisations finalising positions, which could conceivably put the development cost of an industry code at \$2million.

On the basis of that figure, the cost to industry to implement the 'maximum self-regulation' framework in the Act since 1997 is in the billions of dollars. At the same time it has continued to support the regulatory framework of ACMA including its functions of enforcement of the codes and 'reserve power' to determine an industry standard (the ACCC and the TIO.)

It is of course difficult to draw from this a conclusion that industry would not have incurred such costs were it not for the legislated policy of 'maximum self-regulation' under the Act – because it is possible that the regulatory charges (such as carrier licences) may have been far higher to cover the cost to the Government of developing 'black-letter' law. But it is probably fair to say that it seems unlikely that the Government could ever have recouped its costs for developing such an extensive suite of rules through the regulatory charges because the

astronomically-high charges which would have been necessary would be a significant barrier to entry and hence contrary to the competition policy of the Act.

(2) Duplicated costs for compliance and complaint handling.

It is clear that there are duplicated costs to industry from the infrastructure required to monitor compliance and handle complaints with ACIF Codes:

- Membership fees for ACIF to support the 'maximum self-regulation' framework, which includes funding a Compliance Manager to monitor and drive compliance with ACIF Codes
- Licence fees to support ACMA, which includes the function of monitoring and report on ACIF Code compliance
- Costs of meeting the reporting requirements for ACMA for s 105 reports
- Membership fees for the TIO, which includes the function of receiving complaints and reporting on ACIF Code compliance
- Membership fees for TISSC, which includes escalated complaint handling for mobile premium services

7. Would the objectives of the 1997 Act and framework be met by a move to true industry self-regulation? Would the compliance costs be lower?

The Productivity Commission in 2001 noted the overall success of the ACIF model, but concluded that the back-up mechanisms of a 'quasi' or 'co-regulatory' framework were still required.

It is arguable that the basis for such a conclusion has dissipated since 2001. In particular, it appears that the basis for the conclusion was the view expressed in submissions that the interests of suppliers were not always aligned with those of consumers, hence a back-up mechanism was required. Since then, ACIF has reviewed and made improvements its model of consumer participation. The model of code development utilised for the Consumer Contracts Code and the Credit Management Code have been publicly acknowledged by consumers as positive developments. In addition, recent amendments to the Act to enable an industry association to recoup its costs of development of 'consumer-related' codes has a pre-requisite that there is adequate consumer participation in the code development.

Therefore, so far as the codes which provide for consumer protections are concerned, there are now self-regulating mechanisms which address any perception of a lack of alignment between consumers and suppliers.

So far as codes which have been developed relating to inter-operator arrangements to implement the competitive process and network performance, it is also arguable that these arrangements need not be in the

form of codes developed under Part 6. That is, that the focus in the framework on reducing rules to codes, and submitting them for registration, is not appropriate for these types of codes.

The very positive experience of developing operational and network rules between erst-while competitors since 1997 indicates that industry is well able to manage its own affairs without the need for intervention. For example, the mobile number portability scheme is world-class and continues to be well-managed by the industry.

There is scope for examining the current amount of co-regulation under Part 6 of the Act and for examining whether parts or all of the back-up mechanisms are still required: for example, is the suite of the reserve power to make a standard, formal warnings, directions to comply and ultimate Federal Court still warranted in order to achieve the objectives of the long term interests of end-users and the efficiency and international competitiveness of the Australian telecommunications industry? It is relevant to note the few occasions when any such mechanisms have been involved. (See section 3.)

There is also scope for examining whether the scheme for 'maximum self-regulation' should include such a predominant emphasis on the development of codes. A model of quasi or co-regulation needs to avoid the trap that it actually becomes the outsourced form of Government black-letter law, funded by the industry rather than the Government, and that the agency which develops the rules is perceived as a form of regulator itself. Ultimately, it is not the existence of written rules in codes which demonstrates self-regulation – it is the behaviours of the industry in responding to issues, and ensuring consumer trust and confidence in the services which it provides.

The emergence of new technologies and the convergence of technologies and regulation requires that industry respond to consumer issues, and inter-operator issues, in an expeditious and flexible way. As demonstrated by ACIF's VoIP work in 2004-2005, responses such as Fact Sheets, forums, websites can be much more flexible tools in an environment where the issues and technologies have not matured sufficiently and any 'codification' of rules would be premature.

There is also scope for reviewing the requirements in the overall framework for the monitoring of compliance with ACIF Codes. In particular, there is scope for increasing the self-regulatory functions of self-reporting, monitoring of ACIF Codes by ACIF itself, and handling of complaints related to breaches of ACIF Codes by ACIF itself.

It is submitted that moves towards these true self-regulatory directions would lower the compliance burden for the telecommunications industry, would meet the objectives of the *Telecommunications Act 1997*, and be appropriate given the maturity and experience of the industry since the framework for 'maximum self-regulation' /co-regulation was introduced in 1997.

Attachment A - ACIF Publication Report (as at 8 November 2005)

ACIF CODES

Code reference	Code title	Previously published	Published	Registered by ACMA	Code Review	RP
C513:2004	Customer and Network Fault Management	1998 1999 2003	March 2004	7 April 2004	April 2009	ORP
C515:2005	Preselection – Single Basket/Multi Service Deliverer	1998 1999 2002 2003	16 June 2005	13 October 2005	April 2008	ORP
C518:2000	Call Charging and Billing Accuracy	1998	June 2000	27 April 2001	Currently being revised	NRP
C519:2004	End-to-End Network Performance	1998 2002	April 2004	12 August 2004	April 2009	NRP
C521:2004	Prices, Terms and Conditions	1999 2000 2001	February 2005	22 April 2005	February 2010	CIRP
C522:2003	Calling Number Display	2000 2001	February 2003	25 June 2003	February 2005	CIRP
C523:2001	Protection of Personal Information of Customers of Telecommunications Providers	1999	October 2001	30 October 2001 Deregistered 21December 2001	February 2006	CIRP
C524:2004	External Communication Cable Networks	1999 2001	December 2004	Not submitted to the ACMA	December 2009	ORP
C525:2002	Handling of Life Threatening and Unwelcome Calls	1999	June 2002	25 September 2002	Currently being revised	ORP
C531:2005	Commercial Churn	1999 2002	16 June 2005	13 October 2005	July 2006	ORP
C536:2003	Emergency Call Services Requirements	2001 2002	April 2003	25 June 2003	April 2008	ORP

Case reference	Casefile	Previously published	Published	Registered by ACAA	Case Review	RP
C502005	Local Number Portability	1999 2003 2005 June	12 October 2005	Registration pending	October 2010	CRP
C5412003	Credit Management	2000 2001	April 2003	17 July 2003	Currently being revised	CRP
C5422003	Billing	2000 2001	February 2003	27 August 2003	February 2004	CRP
C5462001	Customer Transfer	2001 April	October 2001	30 October 2001	Currently being revised	CRP
C5472004	Complaint Handling	2000 2001	February 2004	25 August 2004	August 2009	CRP
C5542004	Rights of Use of Premium Rate Service Numbers	-	December 2004	29 June 2005	June 2007	CRP
C5552002	Integrated Public Number Database (PND)	2000	April 2002	22 January 2003	Current revision on hold	CRP
C5592005	Unconditional Local Loop Service (ULLS) - Network Deployment Rules	2001 2003	April 2005	20 May 2005	April 2010	NRP
C5642004	Deployment of Mobile Phone Network Infrastructure	2002	December 2004	7 April 2005	December 2009	CRP
C5662005	Rights of Use of Numbers	2004	February 2005	29 June 2005	April 2009	CRP
C5692005	Unconditional Local Loop Service (ULLS) Cabling Provisioning and Customer Transfer	2001	16 June 2005	Not submitted to ACAA	November 2007	CRP
C5702005	Mobile Number Portability	2001 2002 2003	16 June 2005	13 October 2005	August 2008	CRP
C6092003	Priority Assistance for Life Threatening Medical Conditions	-	August 2003	22 October 2003	Currently under review	CRP
C6172005	Connect Outstanding	-	April 2005	18 August 2005	August 2007	CRP
C6202005	Consumer Contracts	-	February 2005	4 May 2005	February 2007	CRP

ACF STANDARDS

Standard designation (AS/ACF)	Standard title	Previously published	Published	Supersedes (original/registration)	ACM/Regulatory status G Granted R Registered	Revised Date
S0022005	Analogue interworking and non-interference requirements for Customer Equipment for connection to the Public Switched Telephone Network	2001	31 Oct 2005	AS/ACF S0022001	R Take registered	Nov 2010
S0032005	Customer Access Equipment for Connection to a Telecommunications Network	1999 2001	17 Jan 2005	AS/ACF S0032001	G 24 May 2005 R 1 Jun 2005	Currently being revised
S0042004	Voice frequency performance requirements for Customer Equipment	1999 2001	15 Jun 2004	AS/ACF S0042001	G 20 Dec 2004 R 31 Mar 2005	Currently being revised
S0062001	Requirements for Customer Equipment, operating in the voice band for connection to the non-switched Telecommunications Network	1999	23 Jan 2001	ACAIS 006-1997 (expired 18 Apr 2001)	G 5 Apr 2001 R 31 Mar 2005	Take confirmed
S0082001	Requirements for authorised calling products	—	12 Dec 2001	ACAIS 008-1997 (expired 1 Jan 2004)	G 24 Dec 2001 R 4 Apr 2005	Currently being revised
Amend No 1/2002 to S0082001	Amend No 1/2002 to AS/ACF S0082001 Requirements for authorised calling products	—	9 Dec 2002	AS/ACF S0082001	G 18 Dec 2002 R 4 Apr 2005	
S0092001	Installation requirements for customer calling (Viring Rules)	—	12 Dec 2001	Asst 009-1997	G 21 Dec 2001	Currently being revised
Amend No 1/2002 to S0092001	Amend No 1/2002 to AS/ACF S0092001 Installation requirements for customer calling (Viring Rules)	—	9 Dec 2002	AS/ACF S0092001	G 18 Dec 2002	
S0162001	Requirements for Customer Equipment for connection to hierarchical digital interfaces	—	19 Dec 2001	ACAIS 016-1997 (expired 1 Jan 2004)	G 19 Mar 2002 R 12 Apr 2005	Take confirmed
S0312001	Requirements for SDN Basic Access Interface	1999	24 Jul 2001	ACAIS 031-1997 (expired 1 Sep 2003)	G 12 Sep 2001 R 24 Mar 2005	Take confirmed
S0382001	Requirements for SDN Primary Rate Access Interface	1999	24 Jul 2001	ACAIS 038-1997 (expired 1 Sep 2003)	G 12 Sep 2001 R 1 Apr 2005	Take confirmed

Standard designation (AS/ACF)	Standard title	Previously published	Published	Supersedes (original/registrant)	ACM Regulatory status G Graded R Registered	Revised Date
SOB2001	Requirements for Customer Equipment for use with the Standard Telephone Service – Features for special needs of persons with disabilities	1999	19 Dec 2001	—	G 19 Mar 2002 R 14 Mar 2005	Take confirmed
SO41:2005	Requirements for DSL Customer Equipment for connection to the Public Switched Telephone Network	—	31 Oct 2005	—	R Take registered	Dec 2010
SOQ21:1999	Requirements for connection to an air interface of a telecommunications network – Part 1: GPRS	—	11 Nov 1999	ACAIS 200:1998	G 10 Dec 1999 R 24 Mar 2005	Currently being revised
SOQ22:1999	Requirements for connection to an air interface of a telecommunications network – Part 2: CDMA (IS95)	—	11 Nov 1999	ACAIS 200:1998	G 10 Dec 1999 R 24 Mar 2005	Take confirmed
SOQ23:2005	Requirements for connection to an air interface of a telecommunications network – GSM Customer Equipment	—	14 Oct 2005	ACAIS 018:1997	T take registered	Dec 2010
SOB1:2003	Requirements for Customer Equipment for connection to a metallic local loop interface of a Telecommunications Network – Part 1: GPRS	2001	8 Apr 2003	AS/ACF SOB1:2001	G 12 Nov 2003 R 2 Mar 2005	Apr 2008
SOB2:2005	Requirements for Customer Equipment for connection to a metallic local loop interface of a Telecommunications Network – Part 2: Broadband	2001 2003	13 Apr 2005	AS/ACF SOB2:2003	G 24 May 2005 R 1 Jun 2005	Apr 2008
SOB3:2001	Requirements for Customer Equipment for connection to a metallic local loop interface of a Telecommunications Network – Part 3: DC low frequency/AC voice band	—	23 Jan 2001	—	G 5 Apr 2001 R 2 Mar 2005	Take confirmed

AFGDUNS

Guideline reference	Title	Revised published	Revised	Review	RP
G551998	Development of Telecommunications Industry Consumer Codes	-	Jan 1998		CRP
G5061998	Mobile Telecommunications Industry Code of Service	-	Jan 1998		
G5101998	Development of Telecommunications Industry Operator Codes	-	March 1998	July 2003	CRP
G5111998	1800/131300 Number Portability - Network Plan	-	April 1998 Reconfirmed 2004	April 2009	NRP
G5142003	Code Administration and Compliance Scheme	2000 2001	2003		
G5162004	Participant Monitoring of Voice Communications	1998	April 2004	April 2009	CRP
G5171998	Monitoring of Communications for Network Operation and Maintenance	1998	Dec 2004	Dec 2009	CRP
G5301999	Mobile Location Indicator for Emergency Services - Stage 1 Service Description for Interim MNL	-	Sep 1999	Currently being revised	NRP
G531999	Assessment of Network Integrity/Intens for Standard	-	April 1999	To be confirmed	CECP
G5342003	Assessment of Emergency Service Access and Network	1999	May 2003	To be confirmed	CECP
G5351999	Compliance levels in Standard development	1998	April 1999	To be confirmed	CECP
G5381999	Interconnection Model	-	Aug 1999		NRP
G5391999	Ration and Amendment of Standard	-	April 1999	To be confirmed	CECP
G5452000	HFC Network RF Signal Edge Monitoring	1999	March 2000	To be confirmed	NRP
G5481999	Supporting arrangements for AS/ACFSD Requirements for connection to an interface of telecommunications	-	Dec 1999	Under revision	CECP
G562000	A Framework for the Introduction of Mobile Number Portability in Australia	June 2000	Aug 2000		
G572002	Standard for Mobile Service Area Register	1999	2002	2007	NRP
G5612002	Mobile Number Portability Network Plan for Voice, Data and Fax Services	Sep 2000 Dec 2000	March 2002	2007	NRP
G562000	Electronic Customer Authorisation	-	May 2000	As considered necessary	CRP
G5632001	Supporting arrangements for the supply of Digital Subscriber Line (DSL) Customer Equipment	-	January 2001	To be confirmed	CECP

Guideline reference	Title	Revised published	Revised	Review	RP
G552001	Mobile Number Portability Network Plan for SVS	-	February 2001	2007	NRP
G572001	Switches Mistake Billing Protection	-	April 2001	October 2008	CRP
G512002	Building Access Operations and Installations	-	October 2002	July 2009	CRP
G522001	Unconditional Local Loop Service Fault Management	-	September 2001	September 2008	CRP
G5312004	MNPT Specification Part 1-Transaction Analysis	2001 2003 Sep 2004	December 2004	As necessary with AIF G502005 MNP Code	CRP
G5312004 Appendix E	XVI Messaging Formats	2003 Sep 2004	December 2004	As above	CRP
G5322005	MNPT Specification Part 2-Architecture and Messaging Requirements	2001 2003 2004	August 2005	As above	CRP
G5332004	MNPT Specification Part 3-Common Network	2001 2003 Sep 2004	December 2004	As above	CRP
G542001	Mobile Number Portability- Customer Information	-	April 2001	As above	CRP
G552001	Mobile Number Portability Protected Number Register	-	June 2001	As above	CRP
G572001	Mobile Number Portability Testing Strategy for Voice, Data and Fax Services	-	April 2001	2007	NRP
G582001	Mobile Number Portability Testing Strategy for SVS	-	April 2001	2007	NRP
G592005	Mobile Number Portability Operations Manual	2001 2003	August 2005	As above	CRP
G612005	SVPP Cloud- Intra Network Short Message Interchange	-	December 2002	2007	NRP
G662001	Access to Telecommunications For People with Disabilities	-	September 2001	September 2005	Disability Council
G5912002	Telecommunications in Rural Reserves- Operational Guidelines for Installations	-	April 2002	January 2010	CRP
G522004	Mobile Number Portability IT Test Strategy	2002	August 2004	Not stated	CRP
G532004	Mobile Number Portability IT Test Plan	2002	August 2004	Not stated	CRP
G562002	Communication Support for Emergency Response	-	April 2002	April 2007	CRP
G572005	Protection Operations Manual	2003	16 June 2005	April 2008	CRP

Guideline reference	Title	Previously published	Revised	Review	RP
C582003	Reselection Billing Information Specification	-	April 2003	April 2008	CRP
C592005	Reselection IT Specification	2003	16 June 2005	April 2008	CRP
C602005	ACF Allocation of Eligible Party Certification Costs	2002	October 2005		CRP
C60212003	Local Number Portability IT Specifications and Operations Manual Part 1- General Call Back and Pooled Local Number Register Processing	-	August 2003	Currently being revised	CRP
C6022003	Local Number Portability IT Specifications and Operations Manual Part 2- Category A Processing	-	August 2003	As above	CRP
C6023003	Local Number Portability IT Specifications and Operations Manual Part 3- Category B Processing	-	August 2003	As above	CRP
C6024003	Local Number Portability IT Specifications and Operations Manual Part 4- Category C Processing	-	August 2003	As above	CRP
C6025003	Local Number Portability IT Specifications and Operations Manual Part 5- Category D Processing	-	August 2003	As above	CRP
C6032004	Local Number Portability IT Test Strategy	-	April 2004	As above	CRP
C6052002	InterNetwork ATM Services	-	December 2002	2007	NRP
C6062002	SV8 Register- Management Processes	-	August 2002	2007	NRP
C6072003	General Test Plan for SV8 PDU over Inter-network Short Message Interchange	-	Feb 2003	2008	NRP
C6082004	EE Infrastructure Common Network Specification	2002	April 2004	April 2009	EEVC
C6102003	The superseding of ACATS 001-1997 by ASNIS 609502000	2002	May 2002	May 2007	CECP
C6112002	Privacy Protection in ACF Publications	-	December 2002	December 2007	CRP
C6122003	Customer Request Handling	-	October 2003	October 2008	CRP
C6132004	Local Number Portability IT Test Plan	-	April 2004	Not stated	CRP
C6142003	Integration Testing Strategy for C5152003 Reselection	-	December 2003	In conjunction with review of ACF C5152005 Reselection Industry Code	CRP
C6152003	Inter-carrier Test Plan for C5152003 Reselection	-	October 2003	As above	CRP
C6162004	Acoustic safety for telephone equipment	-	June 2004	currently being revised	CECP

Guideline reference	Title	Previously published	Published	Review	RP
G6182004	Approach of Non-Deployed Gas Systems under ACFrosty Code C59	-	April 2004	2009	NRP
G6192005	IFND Data	-	February 2005	February 2007	CRP
G6212004	HE Compliance Standards	-	September 2004	September 2009	HEMC
G6222004	HE Administration Note Connectivity Testing	-	September 2004	September 2009	HEMC
G6232005	Regulatory adoption of Customer Equipment safety requirements	-	April 2005	April 2010	CECP
G6242005	Network interface details	-	July 2005	July 2010	CECP

ACFSECTIONS

Guideline reference	Title	Revised published	Revised	Review Recommendation	RP
G502000	Signalling System No 7-Interconnection SUP	1998	May 2000	Not stated	NIP
G502002	Specification-Interconnect Signalling Specification for Circuit Switched Networks	1998 2000	July 2002	Not stated	NIP
G5021998	Australian Network Performance Plan	-	Feb 1998	Currently being reviewed	NIP
G502005	Local Number Portability- Network Plan	1998 1999	January 2005	2010	NIP
G521999	Multi-Location Indicator	-	Feb 1999	Currently being revised	NIP
G592000	Interconnection Implementation Plan	-	May 2000	2007	NIP
G592002	Interconnection Implementation	May 2000	July 2002	2007	NIP
G672002	Unconditional Local Loop Service T Specification- Transaction Analysis	Aug 2001 Dec 2001	October 2002	Not stated	CRP

Attachment B-ACF Cases - Status Report

Case reference	Casefile	Published	Signatories	Dated sign up	Registered by the ACA	Case Review
C5041998	Customer Billing	February 1998			Not submitted to the ACA	Withdrawn from publication Oct 2003
C5131998	Customer and Network Fault Management	October 1998	Finns	1 Feb 1999	(Registration request rejected on 22 February 1999)	Superseded
C5131999	Customer and Network Fault Management	December 1999	Vodafone	1 Jul 2002	To be submitted to the ACA for registration	Superseded
C5132003	Customer and Network Fault Management	December 2003				Superseded
C5132004	Customer and Network Fault Management	March 2004	Telstra	1 Jul 2004	7 April 2004	April 2009
C5151998	Reduction - Single Basket/Multi Service Delivery	October 1998	Finns AAT	1 Feb 1999 19 Jul 1999	11 February 1999	Superseded
C5151999	Reduction - Single Basket/Multi Service Delivery	June 1999	MCI WorldCom FSL Com Telstra RoverTel Macquarie Corporate Telecons	1 June 2001 1 Aug 2001 5 Nov 2001 3 Dec 2001 7 Dec 2001	3 February 2000	Superseded
C5152002	Reduction - Single Basket/Multi Service Delivery	April 2002	Macquarie Corporate Telecons Telstra MCI WorldCom	10 May 2002 22 May 2002 30 July 2002	Was not submitted for registration	Superseded
C5152003	Reduction - Single Basket/Multi Service Delivery	April 2003	Telstra RoverTel	27 June 2003 26 Feb 2004	27 October 2003	Superseded
C5152005	Reduction - Single Basket/Multi Service Delivery	June 2005	Telstra	28 June 2005	13 October 2005	April 2008

Code reference	Codefile	Published	Signatories	Dated sign up	Registered by the ACA	Code Review
C5212004	Fees, Tensard Conditions	February 2005			22 April 2005	February 2010
C522000	Calling Number Display	April 2000	MDVtdCom RSLCom	1 June 2001 1 Aug 2001	6 July 2000	Superseded
C522001	Calling Number Display	October 2001	Marquie Corporate Telecoms MDVtdCom Optus	7 Dec 2001 1 Mar 2002 31 May 2002	30 October 2001	Superseded
C522003	Calling Number Display	February 2003	OPTUS AAR	30 June 2003 1 Oct 2003	25 June 2003	February 2005
C5231999	Protection of Personal Information of Customers of Telecommunications Providers	December 1999	MDVtdCom RSLCom BDigital	1 June 2001 1 Aug 2001 1 Aug 2002	1 May 2000	Superseded
C5232001	Protection of Personal Information of Customers of Telecommunications Providers	October 2001	Telstra Rovate Marquie Corporate Telecoms MDVtdCom Affinity Corp Aves Aust Benchmark Sales	5 Nov 2001 3 Dec 2001 7 Dec 2001 28 Feb 2002 1 June 2002 1 Aug 2002 1 Aug 2002	30 October 2001 Registered 21 December 2001	February 2001
C5241999	External Communications Cable Networks	January 1999			(Registration request withdrawn on 27 April 1999)	Superseded
C5242001	External Communication Cable Networks	April 2001			Not submitted for registration	Superseded
C5242004	External Telecommunications Cable Networks	December 2004			Not submitted for registration	December 2006
C5251999	Handling of Life Threatening and Urgent Calls	January 1999	MDVtdCom Hudson Telecommunications RSLCom Rovate Marquie Corporate Telecoms	1 June 2001 28 June 2001 1 Aug 2001 3 Dec 2001 7 Dec 2001	27 October 1999	Superseded

Case reference	Casefile	Published	Signatories	Dated sign up	Registered by the ACA	Case Review
C552002	Harding of Life Theateringard Uthvone Cals	February 2002	Vodafone Miquale Corporate Telecoms Hudson Telecommunications AART Rovvete Telstra	1 Jul 2002 22 Jul 2002 31 Dec 2002 31 Jan 2003 27 June 2003 27 June 2003	27 September 2002	Currently being revised
C531999	Commercial Cunn	August 1999	MCI WorldCom RSL Com Telstra Rovvete Miquale Corporate Telecoms	1 June 2001 1 Aug 2001 5 Nov 2001 3 Dec 2001 7 Dec 2001	7 December 1999	Superseded
C5312002	Commercial Cunn	April 2002	Miquale Corporate Telecoms Telstra MCI WorldCom AART Rovvete	10 May 2002 22 May 2002 30 July 2002 31 Jan 2003 27 June 2003	13 November 2002	Superseded
C5312005	Commercial Cunn	June 2005	Telstra	28 June 2005	13 October 2005	June 2005
C5362001	Emergency Call Services Requirements	July 2001	Telstra	5 Nov 2001	6 Dec 2001	Superseded
C5362002	Emergency Call Services Requirements	April 2002	Telstra Vodafone	22 May 2002 1 Jul 2002	28 August 2002	superseded
C5362003	Emergency Call Services Requirements	April 2003	Rovvete Telstra AART	27 June 2003 27 June 2003 1 Oct 2003	25 June 2003	April 2003
C5372001	Provision of Assistance to National Security Enforcement and Government Agencies	June 2001	Telstra	5 Nov 2001	28 February 2002	Superseded
C5372002	Provision of Assistance to National Security Enforcement and Government Agencies	April 2002	Telstra Vodafone	22 May 2002 1 Jul 2002	To be withdrawn from registration	Withdrawn from publication April 2003
C5401999	Local Number Portability	September 1999			Not submitted to	Superseded

Code reference	Codefile	Published	Signatories	Dated sign up	Registered by the ACA	Code Review
					the ACA	
C50203	Local Number Portability	August 2003	Telstra RovvTel	15 Dec 2003 26 Feb 2004	12 November 2003	August 2003
C50205	Local Number Portability	12 October 2005	Telstra	28 June 2005	To be submitted to ACA for registration	August 2003
C541200	Credit Management	June 2000	Cable & Wireless Optus MIDVidCom RSCom BDigital	3 May 2001 1 June 2001 1 Aug 2001 1 June 2002	25 January 2001	Superseded
C541201	Credit Management	October 2001	Telstra RovvTel Marquie Corporate Telecoms MIDVidCom Optus ART Vodafone Access Australia PL Affinity Corporation PL Benchmark Sales PL	5 Nov 2001 3 Dec 2001 7 Dec 2001 26 Feb 2002 31 May 2002 27 June 2002 1 Jul 2002 1 Aug 2002 1 Aug 2002 1 Aug 2002	30 October 2001	Superseded
C541203	Credit Management	April 2003	RovvTel OPTUS ART Telstra	27 June 2003 1 May 2003 1 Oct 2003 19 Dec 2003	17 July 2003	Currently being revised
C542200	Billing	June 2000	MIDVidCom RSCom BDigital	1 June 2001 1 Aug 2001 1 Jun 2002	26 October 2000	Superseded
C542201	Billing	October 2001	Telstra RovvTel Marquie Corporate Telecoms MIDVidCom ART Vodafone	5 Nov 2001 3 Dec 2001 7 Dec 2001 26 Feb 2002 27 June 2002 1 Jul 2002	30 October 2001	Superseded

Case reference	Casefile	Published	Signatories	Dated sign up	Registered by the ACA	Case Review
			Benchmark Sales Affinity Cap Axes Aust Hudson	1 Aug 2002 1 Aug 2002 1 Aug 2002 6 Aug 2002		
C542003	Billing	February 2003	Rovatele Telstra AAT BDigital	27 June 2003 27 June 2003 1 Oct 2003 7 Jan 2005	27 August 2003	February 2004
C5462001	Customer Transfer	April 2001	MCI WorldCom FSL Com	1 June 2001 1 Aug 2001	23 May 2001	Superseded
C5462001	Customer Transfer	October 2001	Macquarie Corporate Telecons MCI WorldCom Optus Benchmark Sales Affinity Cap Axes Aust AAT	7 Dec 2001 28 Feb 2002 31 May 2002 1 Aug 2002 1 Aug 2002 1 Aug 2002 31 Jan 2003	30 October 2001	Currently being raised
C5472000	Complaint Handling	June 2000	Cable & Wireless Optus MCI WorldCom Hudson Telecommunications FSL Com BDigital	31 May 2001 1 June 2001 28 June 2001 1 Aug 2001 1 June 2002	13 October 2000	Superseded
C5472001	Complaint Handling	October 2001	Telstra Rovatele Macquarie Corporate Telecons MCI WorldCom Optus AAT Vodafone Benchmark Sales Affinity Cap Axes Aust Hudson Telecommunications	5 Nov 2001 3 Dec 2001 7 Dec 2001 28 Feb 2002 31 May 2002 27 June 2002 1 Jul 2002 1 Aug 2002 1 Aug 2002 1 Aug 2002 31 Dec 2002	30 October 2001	Superseded

Code reference	Codefile	Published	Signatories	Dated sign up	Registered by the ACA	Code Review
C542004	Complaint Handling	February 2004	Optus Povetel	1 Nov 2004 26 June 2005	25 August 2004	August 2009
C542004	Rights of Use of Premium Rate Service Numbers	December 2004			29 June 2005	December 2006
C552000	Integrated Public Number Database (PND)	August 2000	Telstra	5 Nov 2001	6 Dec 2001	Superseded
C552002	Integrated Public Number Database (PND)	April 2002	Telstra Vodafone Pacific National Marketing Pty Ltd M/S Data Assembly Specialists (Axiom) Povetel Receptive Communications Pty Ltd	22 May 2002 1 Jul 2002 1 Oct 2002 29 May 2003 27 June 2003 15 September 2004	22 January 2003	Currently being revised
C592001	Unconditional Local Loop Service (ULLS) – Network Deployment Rules	August 2001	Telstra	22 May 2002	14 November 2001	Superseded
C592003	Unconditional Local Loop Service (ULLS) – Network Deployment Rules	December 2003	Telstra	30 June 2004	12 August 2004	Superseded
C592005	Unconditional Local Loop Service (ULLS) – Network Deployment Rules	April 2005			20 May 2005	April 2010
C642002	Deployment of Radio Communications Infrastructure	April 2002	Telstra	27 June 2003	10 October 2002	Superseded
C642004	Deployment of Mobile Phone Network Infrastructure	December 2004	Telstra	4 May 2005	7 April 2005	April 2009
C662004	Rights of Use of Numbers	April 2004			Tobesubmittedfor registration	Superseded

Case reference	Casefile	Published	Signatories	Dated sign up	Registered by the ACA	Case Review
C562005	Rights of Use of Numbers	March 2005			29 June 2005	April 2009
C592001	Unconditional Local Loop Service (ULL) Cabling Provisioning and Customer Transfer	July 2001				Superseded
C592005	Unconditional Local Loop Service (ULL) Cabling Provisioning and Customer Transfer	June 2005			Not submitted ACA for registration	November 2007
C570201	Mobile Number Portability	June 2001	Macquarie Corporate Telecoms	7 Dec 2001	28 June 2001	Superseded
C570202	Mobile Number Portability	April 2002	AAR Rovatele	31 Jan 2003 27 June 03	28 August 2002	Superseded
C570203	Mobile Number Portability	August 2003	Telstra Optus Australia Pty Limited BDigital	8 Jan 2004 9 March 2004 1 April 2004	1 March 2004	Superseded
C570205	Mobile Number Portability	June 2005	Telstra Rovatele Optus Australia Pty Limited	28 June 2005 30 June 2005 27 July 2005	13 October 2005	August 2008
C582002	Short Message Service (SMS) Issues	December 2002			11 June 2003	Withdrawn from publication December 2004
C6092003	Priority Assistance for Life Threatening Medical Conditions	August 2003	AAR Rovatele	1 Oct 2003 26 Feb 2004	27 October 2003	August 2004
C6172005	Correct Outstanding	April 2005			18 August 2005	Two years from dated registration
C6202005	Consumer Contracts	February 2005			4 May 2005	February 2007



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