

5 April 2011

Manager

Numbering Project
Australian Communications and Media Authority
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Law Courts
Melbourne VIC 8010

Submitted by email to
numbering.project@acma.gov.au



Dear Sir/Madam,

Subject: Consultation Paper 2, "Numbering: Customer location information and numbering data"

Thank you for providing Industry with the opportunity to make a submission to the ACMA's Consultation Paper 2, "Numbering: Customer location information and numbering data".

The attached Position Paper has been jointly prepared on behalf of Industry by the Australian Mobile Telecommunications Association and Communications Alliance.

Yours sincerely,

John Stanton
Chief Executive Officer

Encl.

- Position Paper by AMTA and Communications Alliance to the Consultation Paper 2, "Numbering: Customer location information and numbering data"

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Australian Mobile Telecommunications Association (AMTA)

Position Paper

Numbering: Customer location information and numbering data (Consultation Paper 2)

5 April 2011

Communications Alliance, the Australian Mobile Telecommunications Association (Associations) and their members generally support an analysis of the current and future needs of numbering and of their potential implications for numbering arrangements, recognising that the emerging NBN and IP environment will fundamentally change the way telecommunications services are provided.

In response to the Consultation Paper 2, "Numbering: Customer location information and numbering data" (Consultation Paper) the Associations would like to offer the following comments:

- 1 The Associations acknowledge the importance of the various issues raised in the Consultation Paper. Industry, however, notes that the Consultation Paper does not exhaustively canvass all issues relevant in this context nor does it contain the depth of analysis required to adequately progress a discussion at a policy level.
- 2 Industry also contends that whilst the issues raised (i.e. location information for VoIP services, Integrated Public Number Database (IPND), data retention for emergency services etc.) are connected to numbering, they ought not to be addressed through the numbering plan. Industry believes that the numbering plan ought to focus on the specifications of numbers to be used in Australia and should leave the regulation of services to other instruments.
- 3 Similarly, future public policy settings in respect of geographic numbering and use of associated location information ought only to be made once the industry-wide capability to deliver alternatives has evolved sufficiently - especially in an NBN environment - and those alternatives have been agreed.
- 4 The Associations agree that location information will continue to be important to consumers (and industry) and be integral to an expanding range of products and services and the delivery of community benefits like

emergency services and the emergency alert capability.¹ Equally, Location Dependent Carriage Services (LDCS) are important for industry to provide consumers with a range of location-based services such as call routing to the local outlet of businesses and government departments that use a single national number (example SES (13200), local police (13144), taxi).² The Associations, however, restate their belief that location based information and its implications in a future IPND context are not an issue to be addressed through the numbering plan but rather should be left to a market-driven industry development process.

- 5 Already today, there is a marked change in technology from 'dumb' terminals on smart networks to smart terminals that use a variety of networking capabilities (e.g. a smart phone today can use the suppliers radio network, a local wi-fi network, a femto-cell or atto-cell, or another IP based technology to facilitate communication from the device to another party using a variety of means including 'voice', data or a mix of both). Increasingly technology requires new solutions that leverage off device and network capabilities to identify a current location. In considering future location solutions there needs to be discussion of whether it is reasonable to oblige network providers to continue to provide location information for the benefit of other parties, especially commercial organisations, without some form of cost recovery for providing that information.
- 6 Especially in regard of VoIP services (and it is worth stressing that the term VoIP is not synonymous with 'Voice over Internet') the Associations note that the scenarios as referenced in the Consultation Paper apply to a relatively small number of current IP-based services and the conclusions drawn are not always representative in an NBN environment. The Consultation Paper fails to acknowledge that the bulk of IP based services in Australia are likely to be delivered on carrier-grade IP (NBN) networks which do not rely on the internet.
- 7 Accordingly, the Associations re-iterate their understanding that industry and market processes ought to deliver the most effective and efficient ways to meet an increasing demand for improved location capability (at an industry and regulatory level) in a fully deployed NBN environment.

On a more general note, Industry would welcome a discussion of the general purpose and end-state of the numbering plan as well as of the transition path required to achieve the desired end-state.

¹ It is noted that in the case of mobile services industry is already working collaboratively with the ACMA to develop new customer location information capability for calls made to emergency services.

² In this context industry note their concern the the 2009 amendments to the Telecommunications Act 1997 relating to LDCS and the use of numbers in the IPND imply limitations for groups of consumers with unlisted entries.