

## Submission

**15 November 2023**

Communications Alliance Ltd.  
PO Box 444  
Milsons Point NSW 1565

### **Re: C555:2023 Integrated Public Number Database (IPND)**

The Australian Communications Consumer Action Network (**ACCAN**) thanks Communications Alliance for the opportunity to comment on the C555:2023 Integrated Public Number Database (IPND) Industry Code (**the Code**).

ACCAN is the peak body that represents consumers on communications issues including telecommunications, broadband, and emerging new services. ACCAN provides a strong unified voice to industry and government as we work towards communications services that are trusted, inclusive and available for all.

The IPND provides an important public asset for emergency calls, emergency warnings and law enforcement. ACCAN had previously expressed concerns about processes to ensure the accuracy of Public Number Customer Data (**PNCD**).

ACCAN is pleased to see that the revised code addresses some of these concerns by including:

- clarification of a Carriage Service Providers' (**CSPs**) obligations relating to recording and maintaining the accuracy of the Customers List Code.
- an obligation for CSPs' to advise the IPND Manager if their data provision arrangements or CSP Code changes.
- updates to provisions relating to CSPs keeping the IPND Manager notified of any changes to contact details.
- clarification of the process if a CSP inadvertently overwrites another CSP's records.

ACCAN considers the Code could be further improved by providing more specific timeframes. The Code should specify the timeframe in which a CSP must register with the IPND Manager.<sup>1</sup> Currently, the Code states this must occur 'in a timely manner'. We recommend that a CSP must register with the IPND manager within 10 business days.<sup>2</sup> A specific timeframe will ensure CSPs fulfil their obligation in clause 4.2.1 without undue delay.

We thank Communications Alliance for the opportunity to comment on the Code. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact me at 02 9288 4010.

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<sup>1</sup> Clause 4.2.2

<sup>2</sup> To match the obligation in clause 4.2.10

Yours sincerely,  
Samuel Kininmonth  
Policy Adviser

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*The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers.*

*ACCAN is committed to reconciliation that acknowledges Australia's past and values the unique culture and heritage of Aboriginal and Torres Strait Islander peoples. [Read our RAP](#)*

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