

**COMMUNICATIONS
ALLIANCE LTD**



INDUSTRY GUIDANCE NOTE (IGN 007)

**Issues to Consider for Insolvency Practitioners and
Telecommunications Carriage Service Providers
in relation to Carriage Service Providers in
Financial Difficulty**

OCTOBER 2020

Industry Guidance Note (IGN 007)

Issues to Consider for Administrators, Receivers and Liquidators Appointed to Telecommunications Carriage Service Providers in Financial Difficulty

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VERSION HISTORY

This document constitutes: Version 1 of Industry Guidance Note IGN 007

Date	Version	Comments/Changes
11/05/2015	1.0	First release
OCTOBER 2020	2.0	Second release

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1 INTRODUCTION & BACKGROUND

This guidance note was prepared for the benefit of administrators, receivers and liquidators (called “insolvency practitioners”) and Carriage Service Providers by the Service Continuity Working Group (SCWG) – a group established by Communications Alliance Ltd in June 2014, following the well-publicised collapse of a group of related telecommunications service provider entities in Australia.

The SCWG is comprised of telecommunications industry representatives and the Australian Restructuring Insolvency and Turnaround Association (ARITA), the professional body of company liquidators and bankruptcy trustees, and others involved in the insolvency and restructuring profession. It has observer-members from the industry regulators – the ACMA and ACCC – and from the Federal Department of Communications. Communications Alliance is the primary industry association representing the telecommunications sector in Australia.

The SCWG was formed with the aim to improve and better coordinate the framework of measures available to telecommunications consumers in circumstances where their telecommunications provider is experiencing financial difficulty and/or becomes insolvent.

The focus of the group is on whether means can be found to facilitate better service continuity outcomes for consumers in these circumstances, while also taking account of the legitimate interests of service providers, creditors and shareholders. The group has also taken account of the strong concerns raised by politicians, Government and regulators in the wake of inconvenience and confusion caused to some customers during the recent insolvency of some telecommunications providers.

One of the measures recommended by the SCWG was the creation of this guidance note designed to be a useful resource for ARITA practitioners, for those working in the telecommunications sector; and for those impacted by an insolvency, to assist them to understand the processes involved in an insolvency scenario.

The SCWG recognises that insolvency practitioners are key stakeholders in the arrangements that flow from a service provider falling into financial difficulty and entering a formal insolvency process – or “external administration”- and that they have to apply the law and practice of insolvency to the circumstances at hand.

Nonetheless, it is hoped that a better and stronger working relationship between all parties in what is typically a fast-moving and demanding situation might advance the interests of all stakeholders, including consumers. It is hoped that ARITA members will draw on the information in this guidance note and on the additional support available from Communications Alliance members, to assist their activities during insolvency events, in line with the ARITA Code of Professional Practice.

2 TELECOMMUNICATIONS SECTOR OVERVIEW

Telecommunications services are seen by many in the community as an essential service.

As well as basic communications needs, critical business, security and life affecting applications (e.g. medical alarms, security alarms) are often tied to the on-going availability of access to communications services.

These commercial and human interests arouse significant levels of individual and community concern when circumstances arise which may lead to the supply of these services being terminated or interrupted.

Telecommunications service providers are typically referred to in industry nomenclature as "Carriage Service Providers" or "CSPs", as defined in section 87 of the Telecommunications Act 1997.

There are estimated to be around 1,000 CSPs operating in Australia (the precise number is difficult to pinpoint, because CSPs operate under a class licence).

CSPs vary greatly in size and scope – ranging from single-person operations serving not more than 100 customers, through to major industry players such as Telstra and Optus, serving many millions of customers nationwide.

The range of products and services supplied by CSPs also varies enormously and may include some or all of the following:

- (a) Fixed line voice and/or broadband services;
- (b) Cellular mobile voice and/or broadband services;
- (c) Satellite or fixed wireless-based services;
- (d) Fixed or wireless data links;
- (e) Internet and data hosting services;
- (f) Content services including IPTV and other applications; and
- (g) Energy and insurance products.

The product plans, features and payment structures for this array of offerings also tend to differ from provider to provider. Bundling of a mix of these services into a single retail product has now become commonplace.

CSPs also vary in terms of their network and technical capabilities and their position in the supply chain. CSPs may own and operate all, part, or none of the underlying network and systems over which their products and services are supplied. Even 'full network' operators such as Telstra need to rely on the networks of other operators in order to 'hand-off' messages or data that will be terminated on another network.

CSPs who own little or none of their own network are typically resellers of network-based services supplied by upstream network-capable wholesale providers (including, more recently the national broadband network operator, nbn.). Resellers may also be purchasing services from non-network-capable wholesale providers or aggregators, who hold the direct relationship with the network-based supplier.

Resellers may also outsource provisioning of back-end services including billing, provisioning, customer service, finance and technical support to other parties.

Resellers will often operate commercial relationships with multiple wholesale suppliers, perhaps purchasing one or more products from each. Examples of major wholesale providers in the industry include:

Mobile Voice and Broadband: Optus, Telstra and TPG Telecom Limited (TPG)

Fixed Voice and Broadband: Optus, Telstra, TPG and Vocus.

The sum of the complex set of variables described above is a telecommunications sector in which 'homogeneity' is a meaningless term. As a result, the circumstances surrounding any CSP falling into financial difficulty in the telecommunications sector tend to be unique, and often complicated.

Section 4 of this note provides an illustrative overview of the several typical supply chain structures and scenarios that ARITA members may encounter in the telecommunications sector.

3 THE INSOLVENCY AND RESTRUCTURING SECTOR

Chapter 5 of the Corporations Act 2001 deals with the insolvency of companies. The personal insolvency of individuals is covered by the Bankruptcy Act 1966. In the telecommunications context, it is corporate insolvency that is mostly relevant.

Insolvent companies can be ordered by the court to be wound up – or put into liquidation – on the application of a creditor; directors can also voluntarily place their company into liquidation. Liquidation involves a registered liquidator – typically an ARITA Member – selling up the assets, perhaps trading on the business to allow it to be sold, and paying creditors from the proceeds. Creditors will broadly be anyone who has a valid monetary claim on the company that is unpaid.

Directors may also choose to appoint a voluntary administrator to the company, with a view to obtaining a better financial outcome for creditors by way of a deed of company arrangement. This process may also achieve the survival of the company or its business.

A receiver is appointed by a bank or a secured creditor to recover its unpaid loan moneys. The receiver may sell up the assets and the business such that the company will often then go into liquidation.

In all these types of insolvency appointments, an experienced accountant who is registered as a liquidator by ASIC, and who is often an ARITA member, takes charge of the insolvent company. Their role is to contact and report to creditors, and where necessary hold meetings where issues can be explained. A creditor is entitled to contact the office of the appointed liquidator for information about their standing in the external administration and, in this context, the continuity of any supply arrangements.

Liquidators who are ARITA members are bound by the ARITA Code of Professional Practice, which imposes high standards of conduct. Corporate insolvency and its professionals are regulated by ASIC, and by the courts.

Further details about the insolvency process and the ARITA Code can be found at www.arita.com.au.

4 CONSIDERING A COURSE OF ACTION

In performing their duties and exercising their discretions under the law, insolvency practitioners appointed to deal with an insolvent CSP or telecommunications wholesaler will generally need to give significant consideration in relation to the on-going supply and transferability of communications services and telephone numbers of the customers of that provider. For example, it may be in the interests of creditors of the CSP for the insolvency practitioner to sell the existing business and its customer base.

The insolvency practitioner should also give close consideration to the personal and business difficulties of customers of the CSP, who will generally also be creditors, in losing their telecommunications services and telephone numbers.

A practitioner should have good knowledge of the sector beyond the immediate issues in the financial collapse. There are specialised processes available to deal with these matters and the supply chains in the telecommunications industry vary between quite straightforward to the very complex.

In practical terms, the decisions of the insolvency practitioner may involve the retention of staff of the CSP, the on-going business process capability, and the maintenance of necessary supply chain relationships. These decisions will critically affect both the value of the customer base and also its on-going viability – with the associated human dimension highlighted above – and also whether these specialised industry processes can continue to be accessed.

Such decisions should ideally have regard, or be made with some knowledge of, the implications for customers and the telecommunications industry processes which will affect customer outcomes. Of particular relevance are both the timing and actual decisions about whether to:

- (a) terminate a payout on a wholesale supply arrangement and whether to continue that service;
- (b) provide instructions to wholesale providers about liability for payment and whether to terminate/suspend/continue the supply of service;
- (c) maintain business capability (staff and IT resource) to support customer service; and
- (d) elevate service continuity for customers as one of the competing objectives.

The insolvency practitioner should provide information to the customers about their service choices. Insolvency practitioners should give consideration to ensuring that such information is being delivered through appropriate means and methods.

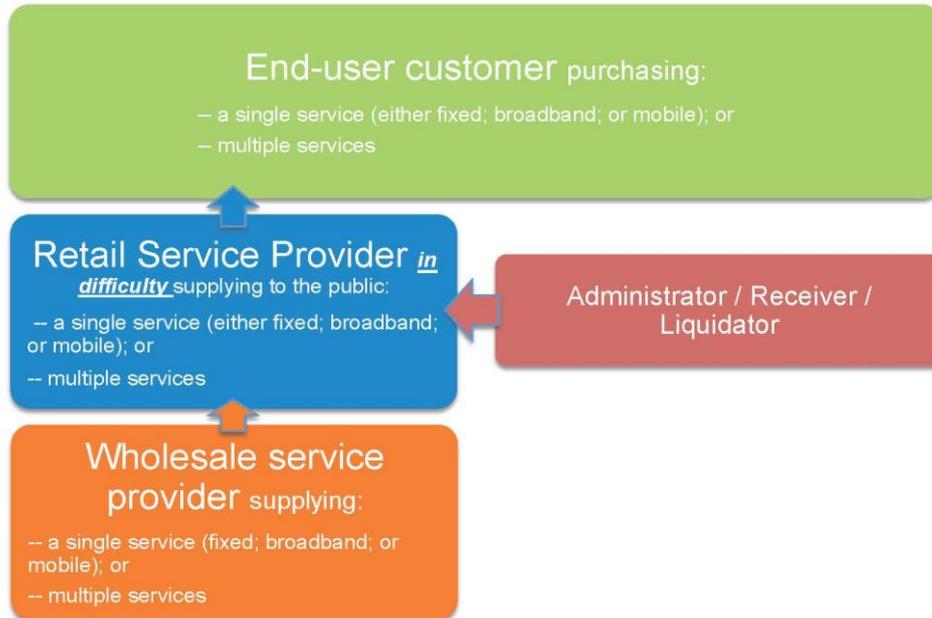
Some more detailed knowledge of the relevant telecommunications industry processes and options may also be of assistance to insolvency practitioners. These details are set out below by way of fact scenario examples.

Conversely, involved members of the telecommunications supply chain that find themselves in a situation where financial difficulties could pose a threat to service continuity (being that of their own customers or the customers of an entity to which they have a commercial link or prospective commercial link) should equally pay close attention to the administration/asset recovery arrangements that are being put in place in that situation.

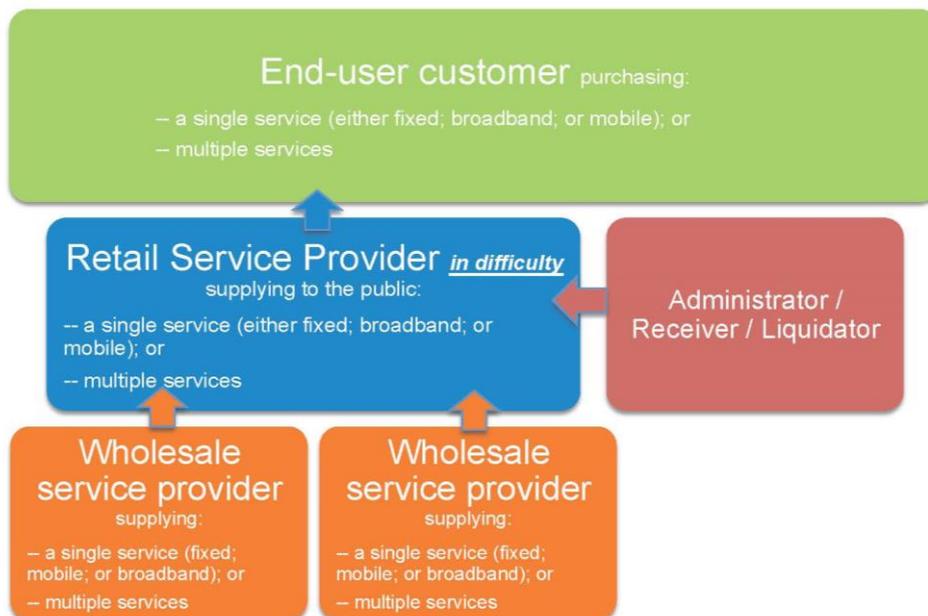
Depending on the circumstances these members may include some or all of the following: wholesale providers, service aggregators, retail providers and prospective acquirers of the distressed asset.

5 EXAMPLES OF INDUSTRY STRUCTURAL SCENARIOS

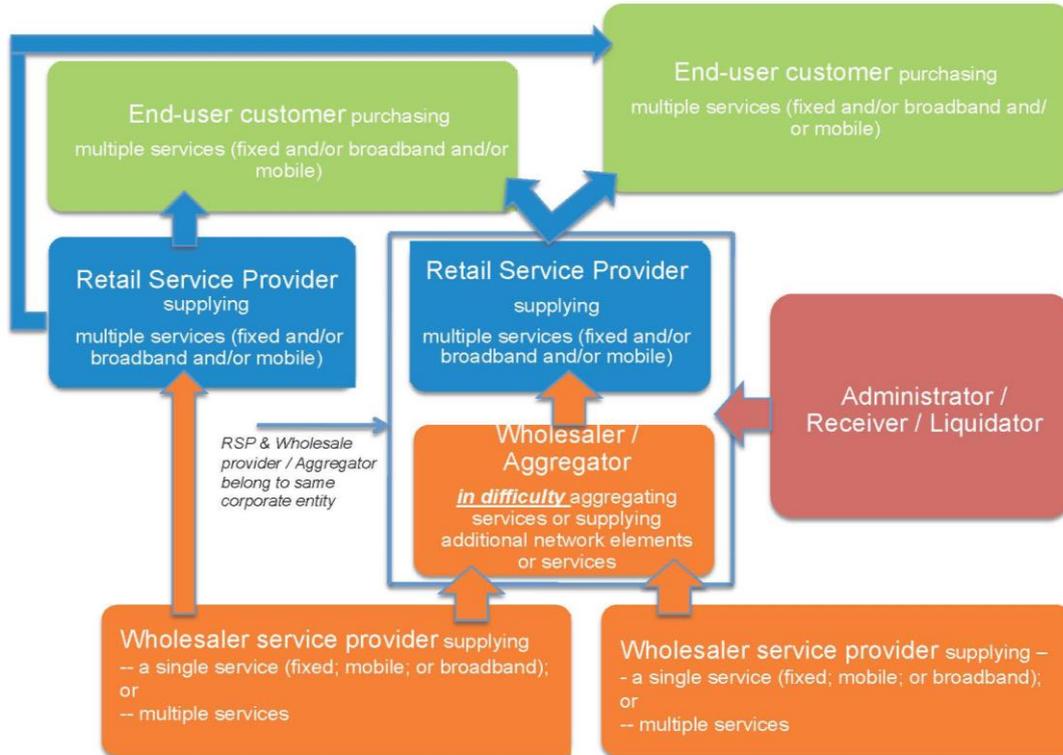
Supply chain scenario 1: A single wholesale service provider supplying service/s to a single retail service provider, which is in difficulty...



Supply chain scenario 2: Multiple wholesale service providers supplying service/s to a single retail service provider, which is in difficulty...



Supply chain scenario 3: Multiple wholesale service providers supplying service/s to a retail service provider and another corporate group with wholesale and retail divisions, which is in difficulty...



6 TELECOMMUNICATIONS REGULATORY FRAMEWORK AND STAKEHOLDERS

The principal regulator for the telecommunications sector is the Australian Communications and Media Authority (ACMA), which is responsible a range of regulatory functions including consumer protection, industry code compliance monitoring and enforcement, spectrum management, numbering, technical regulation and radio-communications licensing.

The industry is also subject to oversight and regulation from:

- (a) the Australian Competition and Consumer Commission (ACCC), responsible for competition policy and elements of consumer protection via the Australian Consumer Law;
- (b) The Office of the Australian Information Commissioner (OAIC), responsible for privacy protections under the Privacy Act;
- (c) The Federal Minister for Communications, who has the power to make determinations affecting the industry;
- (d) The Australian Securities and Investments Commission (ASIC); and
- (e) The Telecommunications Industry Ombudsman, (TIO), who has prescribed powers to make determinations against service providers who do not comply with customer service and/or complaint handling requirements.

7 NUMBERING MANAGEMENT & SERVICE CONTINUITY ISSUES

One of the key consumer impacts that comes to the fore in cases of CSP insolvency is the disconnection of a customer's existing service and how to ensure customers have an ongoing use of telecommunications service using the same telephone number.

Insolvency practitioners should have regard to regulation relating to:

- (a) the Sale of Suppliers business or supplier reorganisation in the Industry Code C628:2019 Telecommunications Consumer Protections, which requires a CSP to do certain things to advise customers about the sale or transfer of the business;
- (b) a customer's rights of use of numbers as per Industry Code C566:2005 Rights of Use of Numbers, where a customer has Rights of Use (ROU) of a telephone number issued to them and they hold that ROU as long as the service is in an active, or suspended state. If a service is disconnected the customer loses access to that telephone number and it cannot be ported or transferred to another CSP.

The ACMA under the Telecommunications Numbering Plan 2015 has the power to withdraw numbers where a CSP is no longer using the numbers and there is no proposed arrangements for a permanent transfer to another CSP. If the telephone numbers are not recovered by the ACMA they may be able to be transferred to another CSP. Insolvency practitioners should discuss numbering arrangements with the carrier network provider.

The winding up in insolvency of a telecommunications provider and the subsequent disconnection of all services may have the (sometimes unintended) effect of preventing affected customers from being able to rapidly move their telephone number to an alternative supplier in order to have an equivalent or new service provisioned. It is this loss of service and/or telephone number, often for an undetermined/extended period of time, which appears to carry the most significant impact of CSP insolvency.

The desire to maximise the opportunity for consumers to retain their telephone number and/or their service can be a source of tension between insolvency practitioners and other stakeholders, given that retention of service, telephone number etc. may well not be a prime consideration in administering the insolvency in the interests of creditors.

In an insolvency situation Service Barring and/or Permanent Disconnections could be initiated by:

- (a) The insolvency practitioner who has effectively taken control of a CSP's operations;
- (b) a wholesale aggregator (e.g. itelecom, M2, telcoinabox);
- (c) a wholesale carrier (e.g. Telstra Wholesale, Optus Wholesale etc.);
- (d) the end user requesting disconnection/reconnection as a way of changing providers.

As a general guide, barring or suspending a service (as may be done for credit management reasons) provides a reasonable amount of flexibility to enable customers to retain their telephone number and to make decisions about their service and where they would like relocate it.

Wholesale providers sometimes have the technical capability to keep services in place (in an active or suspended state) if their downstream reseller customers have ceased operation. This poses a commercial dilemma for the wholesale provider, however, which is unable to bill the end-user(s) during the period in which the wholesale provider agrees to incur the cost of keeping the services 'alive'. This is often exacerbated by the fact that, at this point in the process, the wholesale provider will likely already be owed large sums of money by the failed downstream operator.

Keeping services in place for an interim period – often by agreement between the insolvency practitioner and the wholesale provider – can serve to make it easier and more viable for a customer base to be on-sold to another provider, which typically will be in the best interests of the creditors of the failed entity.

For fixed services, under a process known as 'WHOLESALE RE-BILL REDIRECTION CHURNS' it is often possible to move large or small customer bases en masse to another reseller operating on the same underlying network. (Note that this type of move is not possible if the insolvent entity is the carrier/network owner.)

If a fixed voice service is barred or restricted (either due to non-payment by the end user or the CSP to its wholesaler) this is not a valid reason to reject a multi-basket billing re-direction request out to another CSP.

However if services have been permanently disconnected (either by a request of the insolvency practitioner, by the end user or by the wholesaler for non-payment) a multi-basket billing re-direction request would typically be rejected.

A related process known as 'PORTING / Local Number Portability (LNP) TRANSFERS' allows individual services in a barred or suspended state to be moved to another provider at the request of the end user, provided that a telephone number is still associated with the service. A similar process exists for the porting of mobile numbers – Mobile Number Portability (MNP).

However if services have been permanently disconnected (either by a request of the insolvency practitioner, by the end user or by the wholesaler for non-payment) they cannot be ported because LNP and MNP solutions only apply to a service that has not been disconnected, i.e. the telephone number must be in an active or suspended service status as the Losing CSP LNP or MNP solution would reject any porting request where the associated service has been disconnected.

Retrieving disconnected service numbers:

Where permanent disconnections have occurred for Local Numbers, Gaining Carriers are currently required to return the numbers to the Donor Carrier (the carrier to whom the numbers were originally allocated) within 2 days of disconnection. If this has occurred, a CSP may need to retrieve telephone numbers from the donor's quarantine pool, where possible, and then port them back in order to reconnect a service.

Where permanent disconnections have occurred for mobile services, the Recipient CSP is required to hold onto the telephone numbers during the quarantine period (6 months or 12 months for nuisance calls). The Recipient CSP is then required to return the telephone number to the CSP to whom the telephone number is allocated within 6 days after the end of the quarantine period. If the CSP has incorrectly disconnected telephone numbers and put the telephone numbers into its quarantine pool they must retrieve them from the quarantine pool, to restore service to the customer. In other cases where the Recipient CSP is unable to hold the telephone numbers in the quarantine pool before giving them back to the allocated CSP they must contact the allocated CSP to

provide arrange an earlier give back and for the allocated CSP to put those numbers into quarantine for the required period.

Impacts and delays to the end customer moving to another provider will always be increased once the service has been disconnected and the telephone number has been placed in quarantine.

Source of telephone numbers:

The source of the telephone numbers being used by the failed insolvent provider is another variable that can affect the consumer outcome – and therefore something that would be useful for insolvency practitioner to establish at the outset of their involvement.

Under the Numbering Plan telephone numbers are allocated to a CSP, who then issues them to customers. If the telephone numbers have been allocated to the reseller by the wholesale provider, this typically provides greater flexibility to move those services back to the wholesale provider or another provider.

If, however, the telephone numbers being used by the reseller were directly allocated to it by the ACMA, there will usually be greater difficulty encountered in moving the services and retaining the original telephone numbers, as those telephone numbers will have been 'conditioned' in a particular carrier network by the reseller to suit the characteristics of its products and network.

In summary, the impact on consumers of having their services disconnected as a result of a CSP insolvency is significant as having the service reinstated can be a protracted and complex process over which the consumer has little control.

A greater understanding of the technicalities and impacts of service disconnection and reinstatement, as provided above, might assist ARITA and its members in considering whether alternative options, other than a mass disconnection of services, should be explored.

8 MAG AND FLAG

Communications Alliance operates two specialist groups that come together when cooperative industry action is required. The Mobile Number Portability Administration Group (MAG) and Fixed Line Administration Group (FLAG) comprise industry experts across the mobile, fixed line and VOIP service provider spectrum. They can assist in ensuring smooth transitions for the customers of service providers in difficulty.

Insolvency practitioners are encouraged to contact the Communications Alliance CEO, (info@commsalliance.com.au; P: 02 9959 9111) at the outset of their involvement, to assess whether the MAG or FLAG can be of assistance.

9 INFORMATION MANAGEMENT AND DISTRIBUTION

Telecommunications stakeholders have agreed to create a Service Continuity Information Network (SCIN) that can be brought into play in circumstances where a CSP has failed or is in financial difficulty. It is hoped that this arrangement will keep stakeholders better informed of fast-moving events and aid the creation of consistent messages that can be passed to end users, the media and other interested parties during the episode at hand.

The workings of the SCIN are described at Attachment 1.

ARITA members are requested to make contact with ARITA's Insolvency Specialist Team if they are appointed to a telecommunications service provider so that their appropriate input can be made to the SCIN. Please contact ARITA (CEO@arita.com.au; P: 02 8004 4344).

* * *

ATTACHMENT 1

Service Continuity Information Network (SCIN)

Background:

The financial failure of a number of related Australian Carriage Service Providers (CSPs) in June 2014 caused well-documented disruption to a proportion of the involved customer bases. The episode involved complex and changeable circumstances relating to factors including:

- (a) the inter-related structures of the involved entities;
- (b) that multiple product types were involved;
- (c) the presence of multiple wholesale arrangements and supply chains;
- (d) the varying degrees of success in attempts to move customers to new services before disconnection deadlines; and
- (e) the involvement of multiple administrators, receivers and liquidators.

There was considerable public and political consternation about the situations in which some customers found themselves and a heavy flow of enquiries from customers, the news media and political stakeholders, seeking to get a clear understanding of the situation. These enquiries were being directed in fairly random fashion towards a range of possible information sources, including:

- (a) the Office of the Minister for Communications (and other politicians);
- (b) the Department of Infrastructure, Transport, Regional Development and Communications;
- (c) the Australian Communications and Media Authority;
- (d) the Telecommunications Industry Ombudsman (TIO);
- (e) the Australian Communications Consumers Action Network (ACCAN)
- (f) Communications Alliance;
- (g) receivers, administrators and liquidators; and
- (h) wholesale and retail CSPs in the supply chains.

Each of the information sources encountered difficulty in getting reliable data to help them understand the situation 'on the ground' and in keeping up with the pace of developments. The efforts of these sources to coordinate the messages they were sending into the public arena were not particularly successful.

Response:

The ACMA, DoITRC, TIO, ARITA and involved CSPs (including wholesale suppliers) will create a simple framework – dubbed the Service Continuity Information Network (SCIN) – that will help them obtain and coordinate information in future circumstances where service providers encounter financial difficulties and there is potential for customer disruption.

Mode of Operation:

1. ACMA, DoITRC, ARITA & TIO each nominate a representative to coordinate their organisation's response during a SCIN event (noting that, depending on the individual circumstances, one or more CSPs might also choose to participate in the network as required, if they are involved in the episode at hand and might also choose to ask Communications Alliance to be involved for a specific event).
2. An email group of the representatives is established.
3. Agreement is reached on a standard disclaimer that can be used in conjunction with any information that is prepared and agreed by the SCIN and/or distributed by its members.
4. Any SCIN member can call the group into session if they believe a SCIN event is impending or likely. It is envisaged that discussions will typically commence via an audio-conference and thereafter primarily via email exchanges.
5. The group will appoint a Chair and an Editor from among the group for the purposes of dealing with the event. The Chair will seek to coordinate information gathering efforts and provide whatever other assistance may be appropriate. Information gathering may include liaison with liquidators/receivers/administrators, and/or their representative body, ARITA. The Editor will be responsible for preparing draft information messages to be reviewed by the SCIN before being released and reviewing the information on an ongoing basis as circumstances develop.
6. SCIN members can distribute the prepared information and updates through their own channels, but are not obliged to use any or all of the information that is produced by the group. SCIN members should not knowingly withhold relevant information from the group, nor deliberately release information that conflicts with what they have agreed to within the group.
7. The SCIN Editor will make the agreed information available to other stakeholders including but not limited to ACCAN, Communications Alliance and receivers/administrators/liquidators and politicians (to the extent that the latter are not being separately serviced by DoITRC).
8. All SCIN members should use the agreed disclaimer when distributing information, to make it clear that the information is the results of 'best-efforts' to inform and that SCIN members accept no liability for any inaccuracies that may be contained within it.

Communications Alliance was formed in 1997 to provide a unified voice for the Australian communications industry and to lead it into the next generation of converging networks, technologies and services.

In pursuing its goals, Communications Alliance offers a forum for the industry to make coherent and constructive contributions to policy development and debate.

Communications Alliance seeks to facilitate open, effective and ethical competition between service providers while ensuring efficient, safe operation of networks, the provision of innovative services and the enhancement of consumer outcomes.

It is committed to the achievement of the policy objective of the *Telecommunications Act 1997* - the greatest practicable use of industry self-regulation without imposing undue financial and administrative burdens on industry.



**Published by:
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