

Chair and Agency Head

Mr John Stanton
Chief Executive Officer
Communications Alliance Ltd
Level 25, 100 Mount Street
North Sydney NSW 2060
stanton@commsalliance.com.au

ACMA 2023/415-12

Dear Mr Stanton

Revised payment methods - TCP Code drafting

Thank you for your letter of 14 March 2024 with updated TCP Code drafting relating to payment methods, in response to my letter of 1 February 2024.

The Authority notes that industry has reconsidered its position and agreed to address our key concern that customers have access to a fee-free payment method other than direct debit to pay for telecommunications services. This will provide an important choice for consumers.

ACMA specific feedback on the updated drafting is in Attachment A and has been added to a copy of the comments log table accompanying your 14 March 2024 package. In particular, we have provided feedback on timeframes for direct debit reminder notices and failed direct debit re-try notifications, and noted concerns about new or revised drafting that affects direct debit flexibility and other payment aspects.

The comments provided are our feedback on the drafting presented. They are a guide for understanding the Authority's thinking on the drafting and are designed to assist Communications Alliance and the Drafting Committee to continue working towards a draft TCP Code.

The Authority considers that sufficient progress is being made on the payment methods drafting for it not to commence the necessary processes to introduce an Industry Standard at this time. It expects to receive a near complete Code version by an agreed extended deadline of 20 May 2024 that takes account of the Authority's comments on the 14 December 2023 package and the feedback provided in this letter.

As I have advised previously, the Authority's final decision on the adequacy of the TCP Code will be made in consideration of the version lodged for registration. This will allow us to properly understand and assess the revised consumer safeguards in their full context against the statutory requirements for registration. Also as previously advised, should the ACMA's concerns not be adequately addressed, it remains open for it to pursue direct regulation to address any area of remaining concern.

The ACMA contact for this matter is Cathy Rainsford, General Manager, Consumer Division on (02) 6219 5500 or cathy.rainsford@acma.gov.au.

Yours sincerely



Nerida O'Loughlin PSM

9 April 2024

Encl: Attachment A