



# **G522:2016 Calling Number Display Industry Guideline**

*28 May 2025*

Submission to Communications Alliance  
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## Re: G522:2016 Calling Number Display Industry Guideline

The Australian Communications Consumer Action Network (**ACCAN**) thanks Communications Alliance for the opportunity to contribute to its scheduled review of the G522:2016 Calling Number Display Industry Guideline (**the Guideline**).

ACCAN is the peak national consumer advocacy organisation for communications working to achieve trusted, accessible, inclusive, affordable and available communications and digital services for all Australians.

## Importance of privacy protections

ACCAN continues to oppose the deregistration of the Calling Number Display Industry Code following its 2015 review and maintains that the protections outlined in the Guideline would be more effective if reinstated as a binding industry code.<sup>1</sup>

## Consumer information accessibility

Since Calling Number/Name Display (**CND**) services currently operate on an opt-out basis, carriage service providers (**CSPs**) must provide clear information to help consumers decide whether they want their number displayed when making calls. Understanding the implications of CND is particularly important in the current environment where consumers are cautious about answering or responding to unidentified calls due to scam risks. To ensure informed decision-making, we recommend that CSPs make this information available in accessible formats, including Easy English, plain English, braille, large print, and Auslan. Additionally, we suggest that Communications Alliance consider creating an accessible consumer information template to be included as an appendix to the Guideline, supporting CSPs with a practical tool to ensure compliance and clarity.

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<sup>1</sup> ACCAN, *Calling Number Display Guideline (DR G522:2019)* (Submission, Communications Alliance, 18 March 2019) 1; see also, TIO, *Consultation for the scheduled review of the Calling Number Display Industry Guideline* (Submission, Communications Alliance, 22 March 2024) 2.

# Transparency of billing practices

In our previous submission to the review in 2019, ACCAN recommended enhancing the Guideline to require providers to publish information regarding their billing practices, especially concerning the display of silent numbers on phone bills.<sup>2</sup> ACCAN is particularly concerned that calls to 'silent' lines, including domestic and family violence (**DFV**) services, could appear on billing statements if charges apply. This exposure could potentially put at-risk individuals in danger if an abusive person accesses this information.

We urge CSPs to urgently offer guidance to vulnerable consumers and support services, and to update billing systems to prevent the disclosure of sensitive numbers. Clear and accessible information, along with stronger protections, is essential to safeguard individuals facing DFV in Australia.

## Alignment with the DFSV Standard

ACCAN recommends that Communications Alliance explore how the Guideline can better align with the finalised Telecommunications (Domestic, Family and Sexual Violence Consumer Protections) Industry Standard 2025 (**DFSV Standard**), including consideration of the broader protections needed for individuals experiencing technology-facilitated abuse. In particular, ACCAN recommends that the Guideline ensure CSPs' processes regarding CNDs and silent lines are aligned with the finalised DFSV Standard, to support consistent and effective safeguards across the sector.

## Recommendations for strengthening the Guideline

ACCAN recommends Communications Alliance reconfirm and amend the Guideline to ensure that both vulnerable and general consumers retain adequate privacy protections. We further propose Communication Alliance:

- Enhance the Guideline to mandate clear disclosure by CSPs regarding billing practices related to silent numbers.
- Include clear processes for DFV support services to obtain silent lines that do not appear on customer billing.
- Ensure alignment with the DFSV Standard.
- Retain the obligation for providers to clearly inform customers that CND blocking is not possible when calling emergency services.
- Retain the requirement for providers to explicitly advise consumers regarding the availability or absence of CND on their networks.
- Ensure that consumers are informed that they may exit contractual obligations without penalty if a technological change results in the loss of CND blocking or enabling capability.

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<sup>2</sup> ACCAN, *Calling Number Display Guideline (DR G522:2019)* (Submission, Communications Alliance, 18 March 2019) 2.

- Guarantee information about CND is available in accessible formats including Easy English, plain English, braille, large print, and Auslan.
- Consider establishing an accessible consumer information template as an appendix to the Guideline for providers to adopt, ensuring compliance and clarity.

We thank Communications Alliance for the opportunity to comment on the Guideline. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact Dr Amelia Radke, Senior Policy Adviser, at [amelia.radke@accan.org.au](mailto:amelia.radke@accan.org.au).

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.



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