

Submission

15 June 2022

ACCAN feedback on Draft Number Management – Use of Numbers by Customers Code

ACCAN thanks Communications Alliance for the opportunity to provide feedback on DR C566:2022 Number Management – Use of Numbers by Customers (**the draft Code**). We note that this draft Code replaces two former Industry Codes, that of C566:2005 Rights of Use of Numbers Code and C554:2004 Rights of Use of Premium Rate Service Numbers Code.

In ACCAN's 2021 feedback to the Rights of Use of Numbers Code review, ACCAN outlined some of the issues that consumers face during the number quarantine period and recommended that the Code be improved to address these issues. In particular, ACCAN submitted that stronger rules were required regarding the re-issuing of numbers transitioned to quarantine in error.

As such, ACCAN is pleased to note that the draft Code changes arrangements for Number Quarantine and Give Back of Ported Local and Mobile Numbers. We do, however, recommend that the wording in clause 4.7.2 be changed slightly, from a 'may' to a 'must' statement, to require the CSP to remove a number from quarantine and issue a recalled number to a customer in a shorter period if the customer is the previous Rights of Use holder or authenticated former end user. This is particularly important where the previous Rights of Use holder or authenticated former end user has requested that the CSP issue the recalled number to them.

Furthermore, ACCAN is pleased to note the inclusion of clause 7.1.3 in the draft Code, which provides specific obligations regarding re-issuing an incorrectly disconnected Listed Carriage Service and associated Number to the previous Rights of Use holder. This may help to mitigate some of the consumer detriment experienced when numbers are wrongfully disconnected or quarantined. We are hopeful that the requirement on the CSP to reissue the number to the Rights of Use holder within one business day of becoming aware of the disconnection error may help to prevent lengthy delays to a consumer retrieving their number.

In terms of supporting consumers experiencing vulnerability, ACCAN endorses the addition of commentary in various parts of the Code regarding arrangements for people experiencing domestic and family violence. In particular, we support the example outlining that CSPs may disconnect a number and remove Rights of Use from a customer in situations of domestic and family violence, and issue the number to the former end user of that service. ACCAN also supports clauses 4.6.3 and 4.6.4 and agrees that where a change of number is needed in situations of domestic and family violence or other threat to safety, this change must occur free of charge.

Finally, regarding clause 4.6.1, ACCAN recommends there should be a timeframe associated with the requirement for a CSP to enact a change of number request. ACCAN suggests this timeframe could be 1 business day, although acknowledges that this timeframe might need to be longer for smaller providers.

Please do not hesitate to get in touch if you wish to discuss our feedback further.

Sincerely,

Andrew Williams
ACCAN CEO

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.
