

6 May 2014



Linda Caruso
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Australian Communications and Media Authority
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New South Wales 1230

By email: Regframe@acma.gov.au

Dear Linda,

RE: ACMA April 2014 consultation on proposals reductions in telecommunications reporting requirements

Communications Alliance welcomes the opportunity to comment on the ACMA proposals to reduce reporting obligations on the telecommunications industry.

Communications Alliance congratulates the ACMA for taking the initiative in identifying means to reduce the burden on industry resulting from reporting requirements. We note that the important work being undertaken by the joint ACMA/Communications Alliance Customer Information Committee may identify additional items for repeal.

In the following section we provide comment on the specific items raised in your paper.

MPS Determination

The repeal of Sections 11 and 12 of the MPS Determination is supported, noting that Section 11 of the MPS Determination sets out what information must be provided to customers about MPS, including barring solutions and complaint resolution whilst Section 12 sets out the occasions on which the information must be given.

As the ACMA notes, evidence shows consistently high code compliance rates and low numbers of complaints to the TIO (around one per cent of all complaint issues received) since the introduction of the MPS Code in 2009 and the associated ACMA Determinations. In addition, consumer demand for MPS is falling, as the services previously provided via MPS are increasingly migrating to online platforms such as mobile apps.

The repeal of these sections will not result in any consumer detriment with the TCP Code in place and given the existence of the industry initiative of the '19 SMS' website, which provides general consumer information about MPS as well as information on specific MPS campaigns.

Section 105 Reporting

Communications Alliance supports the proposed reduction in the data provided by industry for the 2013–14 Communications report, pending policy consideration of the section 105 reporting requirement.

Industry has previously identified a number of specific concerns relating to the industry reporting obligation including:

- time required and cost involved in preparing information for lodgement with the ACMA
- overlaps in reporting information to the ACMA and the Australian Competition and Consumer Commission (ACCC).

Communications Alliance looks forward to working with the ACMA on the detail of the specific information of the proposed reductions in the scope of the industry data request.

CSG six-monthly reporting

Whilst industry is supportive of any reduction in reporting requirements, we wish to note that the proposed changes will offer little relief to industry, as reporting will continue to be based on quarterly data, albeit reported annually instead of six-monthly.

We note that the DoC Consultation paper - Proposed measures for the Telecommunications Deregulation Bill No. 1 2014 includes in Proposal 4 CSG:

- *Reform the CSG Standard to allow CSPs to negotiate timeframes and compensation arrangements directly with customers. At the same time, remove the ability of CSPs to ask customers to waive their CSG rights. It may be appropriate, however, given the more limited nature of competition in rural and remote areas of Australia, to retain current timeframes in those areas for a transitional period (e.g. until the NBN rollout is complete).*
- *Remove outdated provisions from the CSG Standard.*
- *Repeal the CSG performance benchmarks.*

Communications Alliance encourages the ACMA to ensure that any changes to CSG reporting reflect the changes introduced under the Telecommunications Deregulation Bill No. 1 2014.

Payphones

Consistent with the comments in the DoC paper regarding the proposed repeal of the CSG performance benchmark, Communications Alliance believes that the Payphones Performance benchmarks should also be repealed. Performance has been stable and in excess of those benchmarks for some time. Ongoing reporting is not adding any value. Removal of the Benchmark and associated reporting would lead to a further reduction of compliance costs.

Communications Alliance notes that under the Location of Payphones Determination, Telstra is required to supply the ACMA with a quarterly register of Payphones. This register provides extensive data including numbers, location and type of payphone. It duplicates a large number of data items covered in the ACMA

consultation paper and accordingly those Payphones reporting requirements should be deleted.

IPND

Communications Alliance supports the changes to reporting requirements under the IPND.

Emergency Call Service reporting and record keeping

Communications Alliance would welcome the simplified approach to record keeping and avoiding potential duplication by removal of reporting requirements in sections 61 and 62. As noted by the ACMA, the general requirement in section 7 adequately ensures that the needed arrangements are in place.

In conclusion, Communications Alliance welcomes the ACMA's proposals and looks forward to working with you to make further improvements to the regulatory regime that reduce costs and unnecessary regulatory burdens.

If you have any further questions with regards to the points raised in this submission please contact Margaret Fleming on (02) 9959 9118.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Stanton', written in a cursive style.

John Stanton
Chief Executive Officer