



Australian Government

Department of Communications and the Arts

# Consumer representation: Review of section 593 of the *Telecommunications Act 1997*

Final report

February 2017

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## Contents

<b>Section 593 of the <i>Telecommunications Act 1997</i></b> .....	<b>4</b>
<b>Scope of review</b> .....	<b>4</b>
<b>1. Consumer representation: section 593(1)</b> .....	<b>5</b>
Is specific telecommunications consumer representation required? .....	5
ACCAN’s overall effectiveness in a consumer representation role .....	6
ACCAN’s effectiveness in representing different consumer interests .....	7
<i>General representation</i> .....	7
<i>Representation of consumers with special needs</i> .....	7
Suggestions for improvement .....	8
Summary.....	8
Recommendations on consumer representation.....	9
<b>2. Independent Grants Program and research: section 593(2)</b> .....	<b>9</b>
Is Government funding of research required? .....	9
Opinions of the IGP and research.....	9
Suggestions for improvement .....	11
Summary.....	11
Recommendations on research.....	12
<b>3. Should other activities be funded?</b> .....	<b>12</b>
Summary.....	13
Recommendations on other activities.....	13
<b>Attachment A—List of recommendations</b> .....	<b>14</b>
<b>Attachment B—List of submissions</b> .....	<b>15</b>

## Section 593 of the *Telecommunications Act 1997*

This is the report of the review by the Department of Communications and the Arts (Department) of the effectiveness of section 593 of the *Telecommunications Act 1997* (Telco Act). The review had a particular focus on grants funding allocated to the Australian Communications Consumer Action Network (ACCAN), which is the only body to receive funding under section 593 since 2009.

Section 593 of the Telco Act enables the Minister to make grants to:

- consumer bodies for purposes in connection with the representation of the interests of consumers in relation to telecommunications issues; and
- persons or bodies for purposes in connection with research into the social, economic, environmental or technological implications of developments relating to telecommunications.

The grants funding is recovered by the Australian Communications and Media Authority (ACMA) as a component of the annual carrier licence charges levied on eligible telecommunications carriers.

This model of telecommunications sector consumer representation has typically not been adopted in other jurisdictions. Examples of other approaches to supporting consumer representation include the establishment of a consumer panel by the communications regulator (the United Kingdom Ofcom's Communications Consumer Panel<sup>1</sup>) and the provision of government subsidies to broad consumer representative organisations (adopted in most western European nations<sup>2</sup>).

ACCAN was formed in 2009 to address then existing stakeholder concerns about fragmented consumer representation in the telecommunications sector. This reflected that, between 1997 and 2009, grants under section 593 of the Telco Act had been allocated to a number of consumer representative organisations, including the Consumers Telecommunications Network (CTN), the Small Enterprise Telecommunications Centre Limited (SETEL) and Telecommunications and Disability Consumer Representation (TEDICORE). CTN, SETEL and TEDICORE ceased operations and became a part of ACCAN in 2009.

ACCAN has received funding under section 593 through two multi year funding agreements. The second of these agreements has a five year term and expires in May 2017. Indexed funds of around \$2 million (GST exclusive) per annum are provided under that agreement, including approximately \$250,000 per annum for a grants program administered by ACCAN.

## Scope of review

The review examined, amongst other issues:

- whether section 593 of the Telco Act should be retained and, if so, whether it should remain in its current form or be amended; and
- subject to the point above, whether further grants should be made under section 593 of the Telco Act on the expiry of the current ACCAN multi year funding agreement and, if so, how and to whom those further grants should be allocated.

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<sup>1</sup> <http://www.communicationsconsumerpanel.org.uk/>

<sup>2</sup>

[http://ec.europa.eu/consumers/eu\\_consumer\\_policy/consumer\\_consultative\\_group/national\\_consumer\\_organisations/index\\_en.htm](http://ec.europa.eu/consumers/eu_consumer_policy/consumer_consultative_group/national_consumer_organisations/index_en.htm)

The Department received 65 submissions in response to its October 2016 issues paper, including 23 from consumer representatives, eight from researchers and academics, six from hybrid consumer and industry organisations, 13 from individuals, seven from the telecommunications industry (carriers or carriage service providers or industry associations), four from wider industry and four from Government agencies. 55 of those submissions have been published by the Department.

## 1. Consumer representation: section 593(1)

### Is specific telecommunications consumer representation required?

Section 593(1) of the Telco Act permits the Minister, on behalf of the Commonwealth, to make grants of financial assistance to consumer bodies for representation of the interests of consumers in relation to telecommunications issues. The first issue considered by the review was whether specific telecommunications consumer representation is still required and, if the answer to this question is yes, should the representation be limited to the interests of consumers with specific vulnerabilities or consumers generally.

There was agreement across consumer representatives and industry groups that a general consumer representative body would be unlikely to achieve the same results as a telecommunications-specific consumer representative organisation such as ACCAN, due to the complex and evolving nature of the telecommunications industry. A number of submissions noted that other consumer bodies, including CHOICE, rely on ACCAN for expertise on telecommunications issues.

*'A specialist voice on telecommunications is critical. Policy issues can be complex and in depth knowledge and research is required... The general consumer groups may work in a complementary way but it is doubtful that they have the specialist knowledge required and resources will often have to be diverted to other issues and priorities.'*—Philippa Smith

*'The NFF judges it critical to have a single dedicated body to provide technical expertise for consumer advocacy groups and to ensure a coordinated approach to address key telecommunications issues.'*—National Farmers Federation (NFF)

*'ACCAN provides a level of commitment and expertise that could not easily be drawn from general consumer or community groups, especially in times of budget restraint.'*—Women's Legal Service NSW (WLSNSW)

*'Telecommunications is a complex and dynamic area so there is space for an organisation like ACCAN which has a specific and specialised telecommunications remit.'*—amaysim

There was also a consensus among respondents that telecommunications is an essential service and all consumers should be effectively represented, preferably by a single consumer body. For the most part, the introduction of a separate body to specifically represent consumers with particular needs was not supported with respondents considering that this could result in reduced coordination and less informed representation.

*'All consumers are deeply affected by telecommunications and should have a voice.'*—David Bednall

*'Consumer representation should take a holistic approach that reflects the interests of all consumers, while supporting communities with particular needs.'*—Ausregistry

*‘There is a risk that the alternative arrangement [body only representing consumers with particular needs] may result in fragmented consumer representation, which the formation of ACCAN was intended to eliminate, and overall less effective representation for all consumers.’—Australian Competition and Consumer Commission (ACCC)*

### ACCAN’s overall effectiveness in a consumer representation role

The majority of respondents to the Department’s issues paper considered that ACCAN performs its consumer representation role well. There was agreement that the scope of ACCAN’s work is very broad; it includes consumer advocacy, consumer education, engaging a diverse range of stakeholders, responding to government consultations and participating in standards development and industry workshops.

Some examples of effective representation by ACCAN cited in submissions include:

- using the ACCAN website and regular newsletters to effectively highlight and raise relevant telecommunications issues for consumers;
- bringing together numerous stakeholders from the telecommunications industry and consumer organisations for annual conferences discussing relevant issues;
- providing support and advice to other consumer and community bodies around the country to effectively represent and advocate on local telecommunications issues;
- producing 154 submissions and 15 policy positions since the commencement of the current ACCAN funding agreement;
- working with the ACMA to deliver lower charges for calls to 1800 and 13/1300 numbers from mobile phones;
- playing a key role in the development of the Telecommunications Consumer Protections Code and the International Mobile Roaming Standard;
- negotiating with fixed line resellers ACN Pacific and Optus to remove silent line charges;
- working with the major telecommunications providers to increase the range of unlocked handsets sold to customers;
- working with Telstra to cease using CAPTCHA technology<sup>3</sup> to improve accessibility for web users who are blind or visually-impaired;
- participating in the ACCC’s Consumer Consultative Committee and contributing 20 submissions to ACCC regulatory inquiries since 2009;
- effective membership of the ACMA’s Consumer Consultative Forum, Numbering Advisory Committee and Emergency Call Service Advisory Committee;
- participating in the Australian Radiation Protection and Nuclear Safety Agency’s Electromagnetic Energy Reference Group since 2013, providing a unique insight into consumer and small business needs; and
- contributing to international forums and policy processes including the Internet Governance Forum, Asia-Pacific Economic Cooperation Telecommunications, International Telecommunications Union and Consumers International.

Many submissions highlighted ACCAN’s ability to work with a range of stakeholders, including its 119 members, to provide a coordinated and knowledgeable approach to consumer representation.

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<sup>3</sup> CAPTCHA tests require web users to read text or identify images to prove they are human in order to access information or services. CAPTCHAs are inaccessible to people who are blind or vision impaired as screen reading software is unable to read CAPTCHAs.

*'With its broad member base, ACCAN is well placed to garner input from groups representing consumers with particular interests and needs. However, in so doing it is more than a mere amanuensis; it is synthesising and presenting the views of such groups in a way that reflects an understanding of technology and industry structures that groups with an 'interest' as opposed to 'industry' focus may lack.'*—ACMA

*'With a diverse membership body, they [ACCAN] succeed in ensuring that everyone's voice is heard.'*—Isolated Children's Parents' Association (ICPA)

## ACCAN's effectiveness in representing different consumer interests

### General representation

Respondents disagreed on ACCAN's performance in representing general consumer interests. Many submissions argued that ACCAN sufficiently represents both general consumer interests and the interests of consumers with particular needs, noting that often there is crossover between the needs of various groups.

*'ACCAN has demonstrated a strong capacity to advocate for key consumer segments while also maintaining a good focus on the needs of telecommunications consumers in general.'*—2508 Disconnected

On the other hand, other respondents (particularly industry representatives) contended that ACCAN could improve its representation of general consumer interests, with submissions arguing that while representation of consumers with particular needs is important, at times this work receives disproportionate emphasis due to ACCAN's membership structure.

*'We contend that ACCAN needs to slightly change the balance. We would argue that advocating on general consumer issues should occupy more of the work of ACCAN on the basis that general consumer issues also cover disadvantaged consumers.'*—Australian Privacy Foundation (APF)

*'While its representation of issues impacting disadvantaged consumers has been effective—the result has also been that issues that impact on mainstream consumers have not received proportionate representation.'*—Australian Mobile Telecommunications Association/Communications Alliance (AMTA/CA) joint submission

*'ACCAN's membership includes over 100 organisations and its engagement strategy and objectives often appear skewed towards meeting their interests and/or expressing their views. The broader mainstream interests and views of consumers are not usually canvassed nor captured by ACCAN and so, arguably, are not included in ACCAN's advocacy activities.'*—Telstra

### Representation of consumers with special needs

The majority of submissions supported the view that ACCAN represents many groups of disadvantaged consumers effectively. These groups include people with a disability, indigenous consumers, low income consumers and those with culturally and linguistically diverse (CALD) backgrounds.

Some respondents stated that the needs of regional, rural and remote consumers could be better represented, especially given the unique nature of communications challenges for those consumers and the changes taking place as a result of the National Broadband Network (NBN) rollout and the Mobile Black Spot Program. A Regional, Rural and Remote Communications Coalition has recently been established, comprising 15 groups including ACCAN, the NFF and the ICPA, to advocate for better

communications services for consumers and small businesses located in these areas. The establishment of this coalition may address some of the concerns that regional Australians are in need of additional support and representation.

### Suggestions for improvement

Various suggestions for improvements were made in submissions. Submissions noted that engagement between ACCAN and industry had greatly improved since the previous Government review of ACCAN in 2012, but engagement could be more productive if there was more direct, early discussion around consumer issues of concern. Industry would welcome more frequent discussions with ACCAN and the opportunity to investigate issues of concern in the first instance, before ACCAN escalates these issues to public forums such as the ACMA's Consumer Consultative Forum. Direct carrier billing was cited as an example of an issue that may have been resolved more expeditiously if more discussion had been undertaken with industry in the first instance. Some industry submissions also argued that working more closely with industry would help to deepen ACCAN's commercial and technical knowledge of the telecommunications sector.

*'Improved sharing of information between ACCAN and industry could resolve many issues before they develop.'*—AMTA/CA joint submission

*'nbn is keen to continue to work with ACCAN to improve ACCAN's knowledge and understanding on nbn matters, which will assist them in explaining them to member groups and the public.'*—nbn co

Industry submissions suggested that representation of mainstream consumers could be improved through closer engagement between ACCAN and industry, specifically the sharing of information such as customer needs, behaviours, preferences and expectations. This would ensure ACCAN has access to the views of the majority of consumers, which is difficult to capture through other means. Arrangements for more frequent engagement and information sharing could be achieved through a revision of the existing 'Statement of Intent' between ACCAN and Communications Alliance. The Government could provide support for this change by including more specific KPIs in any new funding deed entered into with ACCAN.

### Summary

When first enacted, section 593 of the Telco Act was intended to ensure that the interests of consumers were effectively represented to the Government, relevant regulators and industry in a sector where competition had only recently been introduced, and in an environment where self-regulation and co-regulation were intended to play a key role in protecting consumers. Since this time, the retail telecommunications services available to Australian consumers have changed significantly and the sector continues to evolve. There is therefore an ongoing need for consumer participation in policy and regulatory processes. At the current time, given the complexity of this evolving sector, a telecommunications-specific consumer representative body remains an appropriate model to ensure effective consumer representation.

Based on submissions, ACCAN has to date provided a voice for consumers in the retail telecommunications sector. It has generally managed the competing priorities of diverse types of consumers. However, there is room for improvement in the way it performs this role.

## Recommendations on consumer representation

**Recommendation 1:** That section 593(1) of the *Telecommunications Act 1997*, which allows the Minister for Communications to make grants of financial assistance to consumer bodies for purposes in connection with the representation of the interests of consumers in relation to telecommunications issues, should be retained.

**Recommendation 2:** That, on the expiry of the current ACCAN funding agreement in May 2017, the Commonwealth enter into a new funding agreement with ACCAN that provides funding for the purposes of section 593(1) of the *Telecommunications Act 1997*. The new funding agreement should impose obligations reflecting feedback from the consultation process undertaken by the Department in 2016, including for greater consultation regarding current and emerging issues with industry representatives.

**Recommendation 3:** That the Government requests ACCAN and Communications Alliance review and update their existing Statement of Intent regarding the frequency and timing of their engagement, as well as arrangements for sharing information about current and emerging issues, to allow ACCAN's effectiveness as a consumer representative body to be strengthened.

## 2. Independent Grants Program and research: section 593(2)

### Is Government funding of research required?

Section 593(2) of the Telco Act allows the Minister to make grants of financial assistance to persons or bodies for purposes in connection with research into the social, economic, environmental or technological implications of developments relating to telecommunications. As was the case when considering the ongoing need for section 593(1) of the Telco Act, the first issue to be considered is whether funding of specific telecommunications consumer research is still required.

Consumer representatives stated that it is important for consumer organisations to be able to identify, prioritise and conduct research that informs and supports their key objectives.

*'It is important that funding be available for research that is initiated and led by non-academic institutions. Many of the organisations that apply for ACCAN funding are exempt from Australian Research Council (ARC) funding, yet these organisations have direct contact with consumers and important knowledge of the factors leading to digital exclusion, privacy concerns etc.'*—Associate Professor Ellie Rennie

*'While government is often well placed to conduct such research, many consumers are unwilling to engage as openly or directly with a government body as they will be with an independent representative body. Independent research may also identify new or emerging areas of concern that will feed into policy development.'*—ACCC

### Opinions of the IGP and research

ACCAN's Independent Grants Program (IGP) provides funding of approximately \$250,000 per annum for consumer representation or research projects. Over the period ACCAN has operated the IGP, 31 IGP projects have been funded. ACCAN classifies 16 of these projects as research, 13 as consumer representation and two as education.

The ACCAN board determines the strategic plan for the IGP and approves the IGP guidelines and timetable each year. ACCAN seeks input from members regarding the strategic priorities for the consumer sector. These inform the selection of successful bids by a three-member independent grants

panel after a ranking and rating process. The grants team seeks input from key stakeholders across industry, regulators and members to brief the panel prior to final selection. In the 2016 round, the scheme guidelines were refined to explicitly state key topic areas as agreed with the Department in the 2012 ACCAN review.

Over the period the IGP has been in existence ACCAN has itself also commissioned 39 research projects.

There was widespread support from consumer representatives, researchers and regulators for ACCAN continuing to commission research, noting that comment was more commonly received on the IGP, rather than ACCAN's own research.

*'The grants program is an important way for ACCAN to remain connected to and support the work of particular groups of consumers, or develop evidence about particular issues affecting telecommunications consumers.'*—Consumers' Federation Australia (CFA)

*'Groups independent of Government are closer to the firsthand needs and Council of Small Business Australia appreciates being able to work with ACCAN on these issues.'*—Council of Small Business Australia

Research funded via ACCAN cited in submissions as beneficial to consumers or Government agencies included:

- Small Business Telecommunications Service Use and Experience;
- Informing Small Business: Examining Small Business Telecommunications Services;
- Homeless and Connected;
- Empowering women to end digital abuse;
- Death and the Internet: Consumer Issues for Planning and Managing Death Online;
- Affordable Access;
- Connectivity Costs: Telecommunications Affordability for Low-Income Australians; and
- Confident, but Confounded: Consumer Comprehension of Telecommunications Agreements.

Industry representatives were less persuaded by the overall utility of ACCAN's research, arguing that the large number of small, discrete one-off projects lacked effectiveness.

*'(T)he overall management of the ACCAN grants scheme is run well. However, Optus does not consider that the choice of funding recipients and the execution of some research programs have provided outcomes that can "meaningfully influence Government policy" or change industry behaviour.'*—Optus

*'We note industry has generally had little input into the issues subject to ACCAN research which, in our view, limits the quality of the findings or recommendations.'*—Telstra

*'At times the sample sizes used in some ACCAN research have been small or statistically insignificant—resulting in the research being unable to support evidence-based policy positions.'*—AMTA/CA joint submission

Two respondents, Beagle Telecommunications and Telcoworks Trust, did not consider that ACCAN should continue to administer consumer research programs. The AMTA/CA and Optus submissions supported a greater role for the Bureau of Communications Research (BCR), which is a research unit within the Department.

## Suggestions for improvement

A number of respondents supported wider stakeholder involvement in setting the IGP and research agenda to increase the benefits of the program. These suggestions included:

- ACCAN itself recommended that it discuss strategic priorities with the Government and publish these as draft guidelines for the IGP each year;
- AMTA/CA suggested that ACCAN be required to have industry and BCR representation on its grants panel;
- the ACCC suggested ACCC or ACMA representation on ACCAN's grants panel;
- the ACMA suggested consultation occur with the ACCC and the ACMA; and
- Internet Australia (IA) and the Internet of Things Alliance Australia (IOTAA) each suggested that ACCAN be required to formally consult with appropriate industry bodies.

*'ACCAN's process for choosing research topics would greatly benefit from broader input from industry representation on the grants panel. We understand that the research panel while independent of ACCAN's staff only represents an academic expertise. A broader scope of panellists may assist in ensuring that funding is not assigned to projects that have already been covered by regulator activity with industry members or research papers conducted through other forums. We note that the Department's Bureau of Communications Research (BCR), as experts in the field, should also have a role to play e.g. in identifying areas appropriate for research (where gaps exist or where an issue has been identified) and prioritising research topics.'*—AMTA/CA joint submission

There was also interest from CFA, Financial Counselling Australia (FCA), WLSNSW and Associate Professor Ellie Rennie in removing some of the current restrictions in administering the IGP from ACCAN. Each suggested there should be more flexibility with:

- multi-year grants;
- potentially larger amounts than the current \$60,000 limit (also supported by AMTA/CA, the ACCC and Professor Michael Fraser); and
- ACCAN providing top-up or flow on funding to projects outside the designated IGP amount.

*'(C)onsideration could also be given for providing more flexibility for some projects. Currently grants are provided for projects completed within 12 months and capped at \$60,000. There may be benefits to conducting longer term projects, for example a time series study of data usage for consumers. Similarly, grants of more than \$60,000 could be offered for larger projects, subject to consultation with the Minister or the Department.'*—ACCC

## Summary

The Department considers that there remain reasons for funding under section 593(2) of the Telco Act for research regarding various developments in the retail telecommunications sector. Research may facilitate consumer understanding of emerging and complex matters and help to identify important issues for consumers.

While a variety of interesting and useful research projects have been completed under the IGP and by ACCAN itself, the Department considers that there is benefit in a more strategic focus so that more of the projects are able to benefit consumers and assist ACCAN in its consumer representation role. Accordingly, ACCAN should fund a smaller number of projects, each with a broader and more strategic scope. A number of changes could be made to the governance and consultation arrangements for the

IGP and ACCAN's research to facilitate this. It would also be appropriate to remove the existing limit on IGP project funding, given this imposes a significant restraint on the scope of individual projects.

### Recommendations on research

**Recommendation 4:** That section 593(2) of the *Telecommunications Act 1997*, which allows the Minister for Communications to make grants of financial assistance to persons or bodies for purposes in connection with research into the social, economic, environmental or technological implications of developments relating to telecommunications, should be retained.

**Recommendation 5:** That the new funding agreement proposed in Recommendation 2 provide funding to ACCAN for research for the purposes specified in section 593(2) of the *Telecommunications Act 1997*. The new funding agreement should impose obligations reflecting feedback from the consultation process undertaken by the Department in 2016, including as reflected in Recommendations 6 to 9.

**Recommendation 6:** That ACCAN invites senior representatives of relevant Government and industry bodies including for example the Department of Communications and the Arts, the Australian Competition and Consumer Commission, the Australian Communications and Media Authority and Communications Alliance to participate in the development of guidelines for the Independent Grants Program each year, including in determining subject matter priorities.

**Recommendation 7:** That ACCAN be required to share information with the Department of Communications and the Arts, the Australian Competition and Consumer Commission, the Australian Communications and Media Authority, the Australian Mobile Telecommunications Association and Communications Alliance on potential future research activities, including those to be funded under ACCAN's Independent Grants Program, so that efficiency can be maximised and any duplication avoided.

**Recommendation 8:** That ACCAN be required to remove funding caps and time limits for projects funded under its Independent Grants Program.

**Recommendation 9:** That ACCAN should seek to ensure that the members of the Independent Grants Panel have expertise in subject matter priorities.

## 3. Should other activities be funded?

The Department's issues paper asked whether other activities should be funded under section 593 of the Telco Act.

In response, ACCAN argued that there is a need for a better resourced, more strategic approach to consumer education and capability building. This was also suggested by the Australian Seniors Computer Clubs Association, Broadband for the Bush, CHOICE, Media Access Australia, the Indigenous Remote Consumers Association (IRCA), WEstjustice, WLSNSW, IOTAA, the Telecommunications Industry Ombudsman, nbn co, the ACCC and one private consumer representative respondent.

A private respondent supported 'Digital Ability' funding to assist rural and remote consumers to use new technologies. A similar idea was suggested by the IRCA.

One private respondent stated that its members did not receive sufficient technical and troubleshooting support from ACCAN, suggesting that this should also be part of ACCAN's area of responsibility.

In other suggestions for additional activities, the APF and CFA suggested ACCAN undertake casework in consumer complaints. CFA also suggested that ACCAN could embed staff in community legal organisations as a key step in developing knowledge. 2508 Disconnected suggested monitoring and reporting of internet performance. FCA suggested work with second-tier telecommunications companies on hardship issues.

ACCAN and one private respondent noted that the industry was not yet ready to conclude on a model for advice on measures for low income measures. It suggested this be part of a separate broader consultation.

## Summary

A legislative amendment regarding consumer education is unnecessary:

*‘This is an explicit requirement under the current contract with DoCA [the Department] that ACCAN should “educate consumers and organisations on telecommunications issues” with the Key Performance Indicator being “Information is accurate, tailored and relevant to a range of different consumers, offers remedies and is distributed broadly”.’ —ACCAN*

The Department considers that ACCAN’s functions should not include undertaking technical support functions. Technical support is most appropriately provided by retail service providers who provide the relevant service and are therefore best placed to provide the support.

ACCAN may consider suggestions from respondents about additional activities, such as in the area of consumer education, when setting its future strategic priorities. However, it is not recommended that additional funding is provided by the Commonwealth to ACCAN for this purpose.

## Recommendations on other activities

**Recommendation 10: That the scope of section 593 remains adequate and that no expansion of this section is required.**

## Attachment A—List of recommendations

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Recommendation 8: That ACCAN be required to remove funding caps and time limits for projects funded under its Independent Grants Program.

Recommendation 9: That ACCAN should seek to ensure that the members of the Independent Grants Panel have expertise in subject matter priorities.

Recommendation 10: That the scope of section 593 remains adequate and that no expansion of this section is required.

## Attachment B—List of submissions

1. .au domain administration
2. 2508 Disconnected
3. amaysim
4. Arnold, Michael
5. Ausregistry
6. Australian Communications and Media Authority (ACMA)
7. Australian Competition and Consumer Commission (ACCC)
8. Australian Communications Consumer Action Network (ACCAN)
9. Australian Mobile Telecommunications Association/Communications Alliance (AMTA/CA)
10. Australian Privacy Foundation (APF)
11. Australian Radiation Protection and Nuclear Safety Agency
12. Australian Seniors Computer Clubs Association
13. Beagle Internet
14. Bednall, David
15. Binnie, Ian
16. Broadband for the Bush Alliance
17. CHOICE
18. Consumer New Zealand
19. Consumers' Federation Australia (CFA)
20. Coombs, Elizabeth, NSW Privacy Commissioner
21. Council of Small Business Australia
22. deRidder, John
23. Electronic Frontiers Australia
24. Financial Counselling Australia (FCA)
25. Fraser, Michael
26. Gregory, Mark
27. Indigenous Remote Communications Association (IRCA)
28. Infoxchange
29. Institute of Electrical and Electronics Engineers
30. Internet Australia (IA)
31. Internet of Things Alliance Australia (IOTAA)
32. Internet Society
33. Isolated Children's Parents' Association (ICPA)
34. Lee, Karen
35. Media Access Australia
36. Melbourne Networked Society Institute
37. Milne, Claire, Antelope Consulting
38. National Farmers Federation
39. nbn co
40. Opticomm
41. Optus
42. Raiche, Holly
43. Rennie, Ellie
44. Salthouse, Sue
45. Smith, Philippa
46. Standards Australia
47. Telcoworks Trust
48. Telecommunications Industry Ombudsman
49. Telsoc

50. Telstra
51. Toohey, Jemma, Albury-Wodonga Volunteer Resource Bureau
52. WEstjustice
53. Wilding, Derek
54. Women's Legal Service NSW
55. Women's Legal Services Australia
56. Private submission
57. Private submission
58. Private submission
59. Private submission
60. Private submission
61. Private submission
62. Private submission
63. Private submission
64. Private submission
65. Private submission