



**Submission:**  
**Consumer representation: Review of section 593 of the**  
***Telecommunications Act 1997* Issues paper**

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## Contact

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## General Comments

AusRegistry has been the Registry Operator for the .au namespace since 2002, and is responsible for creating and driving software and infrastructure to ensure the stability and integrity of Internet operations in Australia.

The *Consumer representation: Review of section 593 of the Telecommunications Act 1997 Issues Paper* ("the Issues Paper"), published by the Department of Communication and the Arts, outlines a number of considerations regarding the funding of ACCAN and the operation of section 593 of the *Telecommunications Act 1997* ("the Act").

The communications sector has changed significantly since the Act was created; the internet is more widely used than ever before. Consumers require representation on a wide range of increasingly complex issues related to the telecommunications industry, which necessitates a cohesive and comprehensive approach to consumer advocacy.

AusRegistry recognises the importance of effective consumer representation in the telecommunications industry and the significant work undertaken by ACCAN to ensure the interests of Australian consumers are successfully represented.

The effectiveness of a single peak body representing the interests of their member organisations cannot be discounted. ACCAN was established through the consolidation of a number of organisations, specifically to address problems caused by there being multiple consumer representation organisations.

## Response to Issue Paper Questions

### 1. Has ACCAN effectively performed the role of representing the interests of consumers in relation to telecommunications?

AusRegistry recognises the volume and breadth of the work done by ACCAN on behalf of consumers, and believe it reflects just how effective they are in their role as Australia's peak communications consumer organisation.

As noted in the Issues Paper, the consumer representation work of ACCAN has been significant and wide-reaching. ACCAN represents consumers on numerous and diverse committees, engages with the Government and telecommunication industry on key issues, supports consumer research, and delivers a substantial number of submissions on behalf of consumers to a range of consultations and inquiries.

### 2. Does ACCAN effectively engage with a broad range of stakeholders, including industry, government agencies and other consumer groups?

ACCAN's engagement with consumer stakeholders, government agencies, and the industry at large is extensive; AusRegistry considers this level of engagement to be highly effective in facilitating ACCAN's representation of consumers.

As at 30 June 2016, ACCAN has over 100 organisational members. These member organisations represent a wide range of communities, businesses, and policy interests. These members are geographically diverse and intersectional across a range of groups with particular needs. ACCAN both hosts and attends forums

regularly to engage with stakeholders and organisational members, and to seek input from representatives on disability, small business, and Indigenous issues.

Stakeholder engagement cannot be effective without the reciprocation of the stakeholders. ACCAN is reliant on the participation of consumer stakeholders, government agencies and the industry at large in undertaking successful consultation and engagement.

### **3. Considering the consumer representation role performed by ACCAN, has ACCAN adopted an appropriate balance between representation of general consumers and representation of those with particular needs?**

AusRegistry considers the diversity of ACCAN organisational members and policy priorities to be a considerable reflection of the inclusiveness of the consumer representation undertaken by ACCAN.

ACCAN organisation members include numerous organisation that represent consumers and communities with particular needs, including people with disabilities, pensioners, Indigenous people, homeless and financially disadvantaged consumers, and those living in rural, regional and remote Australia.

ACCAN's 2016-17 policy priorities include improved consumer safeguards, accessibility, privacy and security, affordability, and digital literacy - representing the interests of general consumers, as well as those with particular needs. AusRegistry applauds ACCAN for developing priorities that are pertinent and diverse, setting the agenda for Government and industry change to improve the experience of all communications consumers.

### **4. Is a telecommunications specific consumer representative body funded by Government required?**

#### **Should Government fund representation only for a body or bodies representing consumers with particular needs?**

While the interests of priority populations and consumers with particular needs is important, AusRegistry submits that this should not be to the exclusion of the 'average' consumer. Consumer representation should take a holistic approach that reflects the interests of all consumers, while supporting communities with particular needs.

#### **Could a telecommunications representation function be carried out by a general consumer body?**

The Issues Paper does not elaborate on how a general consumer body may approach telecommunications representation, which makes this question difficult to answer. Evaluating an ambiguous theoretical model of representation against the actual representative model of ACCAN poses some difficulty.

Without more detail, AusRegistry is not able to comment on whether a general consumer body would be able to represent consumers more effectively than a dedicated organisation, considering the complexity and breadth of telecommunications issues and the significant number of industry and consumer stakeholders.

### **Could Government more directly measure consumer views by undertaking its own consumer research?**

Government research is unlikely to be a suitable substitute for independent consumer led research, such as the research projects commissioned by ACCAN. AusRegistry submits that independent organisations are better able to undertake qualitative consumer research with expedited reporting.

### **5. Have you seen any examples of how research funded through the Independent Grants Program (IGP) has influenced Government policy or the behaviour of industry? Could changes be made to the IGP to make the funded research projects more influential?**

AusRegistry has no comment to submit in response to this question.

### **6. Do you believe research funded through the IGP is useful to consumers? Could changes be made to the IGP to make the funded research projects more useful to consumers?**

The latest round of grants announced will fund research to examine mental health apps, the security implications of Internet of Things, and identity theft, among other projects. Past projects funded by ACCAN have undertaken research in consumer privacy, internet accessibility and homelessness, women's technological safety, and issues faced by culturally and linguistically diverse populations in accessing telecommunications services. All of these research projects draw attention to issues facing consumers, with the objective of creating solutions.

The Issues Paper does not define or expand on what might make research "useful" to consumers. AusRegistry submits that research that informs ACCAN policy positions and encourages Government and industry bodies to better serve consumers should be considered useful.

### **7. Is it appropriate for the Government to continue to provide grants to a consumer representative group (or any other non-government body) to undertake research into telecommunications issues?**

Non-government bodies are best placed to undertake research that successfully accesses hard to reach communities, and is qualitative and independent. ACCAN grants fund diverse research projects, connecting them as a consumer representative group to consumers themselves through research reporting and milestones. Given the large network of ACCAN members and the numerous committees ACCAN is represented on, this research can be disseminated to stakeholders and the industry at large and may facilitate collaboration between organisations.

**8. If this is appropriate, what changes (if any) would you recommend to how the funding is provided and who it is provided to?**

ACCAN's Independent Grants Panel is ideally placed to award funding to research projects with consideration to consumer issues and policy priorities.

One of the concerns mentioned in the Issues Paper is that the current funding arrangement limits the amount of money that a research project may receive, which may not be sufficient to meaningfully examine an issue and successfully influence Government policy. A possible solution to this issue is that the research undertaken with ACCAN grants is considered to be preliminary, and successful completion of the project allows the researcher/s to apply to DoCA for further funding to expand the scope and depth of the research.

**9. Should any other activities, other than consumer representation and research, be considered for funding under section 593 of the Telco Act? If so, what should these be and what would be the rationale for funding such activities be?**

AusRegistry has no comment to submit in response to this question.

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