

# Name and contact details of person/organisation making submission

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Council of Small Business of Australia

# General comments

COSBOA considers the role played by ACCAN in representing small business consumers of telecommunications to be vitally important. Small business consumers are often overlooked and offered sub standard products with sub standard contracts. ACCAN has assisted in identifying and characterising the needs of small business telecommunications consumers extremely well.

Building a solid and sustainable relationship with the Council of Small Businesses of Australia (COSBOA) where we have:

* collaborated on submissions
* ACCAN has had a presence at the COSBOA annual conference each year including a stall and given presentations
* incorporating COSBOA representation in a number of ACCAN forums and the ACCAN national conference each year
* Supporting the Executive Director’s travel to attend relevant ACCAN meetings, forums and consultations including one meeting with the ACCAN Board

ACCAN is a member of COSBOA and COSBOA has also joined ACCAN and we look forward to continuing a productive relationship into the future.

# Response

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

COSBOA has a good working relationship with ACCAN both at CEO and Board level. As the Executive Director of COSBOA I have been supported to attend ACCAN organised industry meetings in Sydney and also present to the ACCAN Board. This has assisted COSBOA to understand the intricacies of telecommunications regulation and policy and improved our engagement with those complex processes. This in turn gets the point of view of small business into the policy discussion when it is often overlooked.

ACCAN has also worked hard to consult and incorporate the concerns of small business members in our position statement on the future of the customer service guarantee and discussions around service reliability.

ACCAN has conducted several events specifically targeted at gathering the views of small business.

ACCAN commenced allocating discrete resources into the small business sector from FY 2011-12, and has substantially increased this effort year on year since then. COSBOA appreciates that ACCAN established the role of small business project officer within the ACCAN team continuously since 26 November 2012. In this period ACCAN has

* Clarified the type of membership available for small business owners and peak bodies through changes to the ACCAN Constitution
* Implemented a small business stakeholder engagement strategy including an annual Small Business Advisory Forum – the first of which was held in June 2015
* Created a suite of small business tip sheets focussed on business continuity, choosing service providers, cloud services and seeking compensation after outages and/or poor quality services.

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

Yes, ACCAN has brought many groups together and understands that small businesses likewise come from many different perspectives – rural, remote, cultures, industries etc. ACCAN has helped us take these perspectives to government and to other consumer groups and service providers.

COSBOA appreciates that ACCAN also produces dedicated small business submissions as well as ensuring specific small business topics are addressed as they arise in broader ACCAN submissions and representations to government and other inquiries.

ACCAN has also forged a good relationship with the state-based Small Business Commissioners and the newly formed Australian Small Business and Family Enterprise Ombudsman who spoke at the ACCAN conference 2016.

ACCAN also created a Digital Business Kit called Digital Ready which is a comprehensive training tool for small business and marketed it extensively. This is funded separately under another Commonwealth grant, however ACCAN has contributed over and above the requirements of the grant and used this kit as a key part of its work to empower small businesses to use digital systems and digital media effectively.

## 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?

Yes. People with disabilities also run small businesses and ACCAN has brought together ways for them to be better able to use digital services. In turn ACCAN materials also help small businesses become better at working with people with disabilities by using telecommunications services more effectively.

Likewise many different CALD groups run small businesses and COSBOA has always observed ACCAN to be inclusive and work across the different communities well with education material that is easy to use and is appealing not matter your cultural background.

## 4. Is a telecommunications specific consumer representative body funded by Government required or:

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

NO. The area of telecommunications needs the deep expertise of ACCAN.

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

NO. The area of telecommunications needs the deep expertise ACCAN has. It would be too difficult to manage the competing demands across all the different issues. Telecommunications is too complex and needs expertise.

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

Groups independent of Government are closer to the firsthand needs and COSBOA appreciates being able to work with ACCAN on these issues.

## 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?

ACCAN has completed two small business research projects: ‘Small Business Telecommunications Service Use and Experience’ (under the grants scheme) creating a baseline of small business issues, and more recently ‘Examining Small Business Telecommunications Services’ which assessed the availability of service level agreements and sales team know-how.

Other ACCAN projects have also been useful to small business, such as the Death of the Internet project which has also informed ACCAN’s advice to small business in the ACCAN small business tip sheets and brochures.

Telecommunications companies have strong marketing towards small businesses but not necessarily very good delivery. ACCAN’s research has uncovered important issues for COSBOA’s members and articulated them well.

## 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?

Yes the research has been useful for small business consumers.

## 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?

Yes. The scheme is effective and appropriate.

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

It’s all good

## 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?