# Name and contact details of person/organisation making submission

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I note that I am making this submission in my own capacity and do not claim the views expressed are those of Deakin University.

With my colleague Professor Michael Polonsky, I conducted a study on behalf of ACCAN entitled “Consumer Response to Unit Pricing for Mobile Telephony”, completed in 2014. The Report was designed to review Unit Pricing as a mechanism to improve consumer decision making when adopting mobile phone plans. The Report recommended that:

R1. Unit pricing should be maintained

R2. Where unit pricing is provided for call costs, these should be expressed in terms of a

one‐minute call.

R3 Unit pricing for data should be expressed in terms of gigabytes or part thereof.

R4 In advertising mobile phone plans and at point of sales, customers should be

provided with three levels of information – 1) overall plan features, 2) unit pricing

information and 3) a data calculator.

R5 Level 2 and 3 information should be provided in a standard format across the

industry, enabling consumers to make ready comparisons between plans and

between competitive offers from different providers.

R6. Continuing public education is needed.

R7. Warnings about going over should always include the date when the allowance

period ends and tell consumers what the rate will be if they “go over” based on the

Level 2 information.

R8. The Consumer Protection Code should be reviewed in the light of these findings and

recommendations.

ACCAN required that our Report be published using a Creative Commons licence so all could have free access to it. While the issues were discussed at a presentation to ACCAN management prior to finalising the Report, the recommendations were entirely our own.

# General comments

I would have preferred that ACCAN publish a response to our recommendations. Some of them were not entirely in line with past reports and policy, so this would have been useful.

# Response

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

Yes, clearly. Their arm’s length role separate from government puts them in a better position to represent public policy than a group working in public policy within a government agency. I have personal experience of this.

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

I have not seen first hand the full range of its activities, but have seen various research commissioned by ACCAN,, including that with a colleague at Deakin, Dr Paul Harrison.

## 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?

Difficult for me to judge.

## 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?

All consumers are deeply affected by telecommunications and should have a voice.

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

A body like ACA could do this function, if appropriately resourced and with a research budget.

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

No need.

## 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?

Mandatory ACCAN Board response, along with industry encouraged to respond.

## 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?

Fine as is.

## 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, definitely best assurance of independence.

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

Make it competitive.

## 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?

Unsure.