

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

This submission can be published on the World Wide Web

Yes

Date of submission

24/11/2016

Logo of organisation—if an organisation making this submission



Name and contact details of person/organisation making submission

David Spriggs CEO,

Infoxchange

33 Elizabeth St Richmond Vic 3121



General comments

Infoxchange sees ACCAN as a valuable organisation in terms of developing a coordinated approach to understanding complex telecommunications issues. We especially feel that the need for an organisation such as ACCAN is one that is growing in relevance as Australia becomes more and more digital in nature. The recently released Australian Digital Inclusion Index¹ shows that a lot of work needs to be done increasing the digital capacity of Australians in many regions as well as a number of key demographics across the country.

Additionally as poverty appears to be growing in Australia² the specific need for those in hardship such as people in social housing, rural communities or people who are homeless to understand the intricacies and implications of their telecommunications use is increasingly important. The work ACCAN does in identifying the complex nature of telecommunications affordability in relation to these groups is of particular value. A diminishment of this role would be detrimental to Australia.

We also note that ACCAN in 2016 has actively supported the National Year of Digital Inclusion programme which has brought together many partners from corporate such as

¹ <http://digitalinclusionindex.org.au/>

² <http://www.acoss.org.au/wp-content/uploads/2016/10/Poverty-in-Australia-2016.pdf>

Australia Post, Google and Telstra to many Not for profits, community and government organisations to celebrate Australia's successes in digital inclusion.

Infoxchange has also observed ACCAN's other work to build educational resources and find them valuable.

Response

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

Yes we believe so. We are particularly supportive of the coordinated approach they take in developing a deep understanding of the many complex telecommunications issues facing consumers, especially those who are disadvantaged.

Of particular effect is the way ACCAN develops information resources and advocacy tools that can be understood at all levels, from the consumer facing hardship through to government, Telcos and the NFP service sector. These are designed in collaboration with Telcos, the sector and individuals in a way that ensures relevance and accuracy and this provides an added benefit.

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

ACCAN has managed to do this very successfully over a number of years. The research funding in particular has enabled a deeper understanding and evidence base for solutions to be developed.

Additionally the regular forums held by ACCAN have a history of bringing together many stakeholders in a way where robust discussions can be had in a respectful and informed manner.

In essence Infoxchange has observed when invited to participate in a number of ACCAN events from the ACCAN national conference to specialist one off events to address sector concerns. ACCAN synthesised the views across a multiplicity of sectors extremely well.

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?

We believe so. ACCAN is a coordinated channel for the NFP and associated service sectors, industry and those who are experiencing Telco disadvantage. We see that they discharge their mission in a balanced way.

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?

Yes it is very much required and as both the nature of economic disadvantage grows and the increasing complexity of telecommunications (e.g. Internet of Things) an independent body of this nature will be more valuable.

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

We see no need to change this as the knowledge and expertise built up by ACCAN over time would need to be replicated in that general consumer body. It would likely result in a more costly organisation and at the same time dissipate the deep technology and consumer knowledge and relationships that ACCAN has built over time.

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

It is unlikely that a consumer based measure developed by government would have the critical benefit of being seen as independent. Having a body such as ACCAN providing this function at arms-length from government gives this key benefit of being entirely independent and impartial. This in turn is a valuable asset for government.

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?

We have seen a number of examples where this has had major impact. Infoxchange was able to strongly leverage the ACCAN funded work of University of Sydney researcher, Dr Justine Humphry entitled Homeless and Connected (<http://accan.org.au/grants/completed-grants/619-homeless-and-connected>). This work explored the internet access and use of mostly young homeless and at risk individuals identifying critically that a large number actually had mobile phones – it was access, charging, data costs and whether they could keep the phone safe that were the real issues. This information allowed Infoxchange to pitch an idea to the Google impact challenge and win \$500,000 in funding to develop a service directory for homeless and at risk called Ask Izzy that was launched by Prime Minister Turnbull early in 2016. Flowing on from that Telstra in November 2016 announced that this app is to be zero data rated thus allowing those homeless and at risk the opportunity to search without incurring data costs³.

Ask Izzy is an innovative development in services to homeless and at risk individuals and families and represents a significant example of where the value of a small investment by ACCAN in research has allowed organisations such as Infoxchange, Google and Telstra to build a high value partnership worth many times the original investment by ACCAN.

³ <http://www.heraldsun.com.au/news/telstra-joins-fight-to-help-homeless-by-giving-free-unmetered-access-to-help-service-ask-izzy/news-story/807ab859ddb6ab3c3b60fda9700629b4>

<http://www.theaustralian.com.au/news/nation/telstra-backs-ask-izzy-online-initiative-to-support-homeless/news-story/8ebdddc81c3afcf921f784a66336b51>

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 research is highly useful to end consumers (see previous example)

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. As the recently released Digital Inclusion Index (<http://digitalinclusionindex.org.au/>) shows the digital divide in Australia is significant in many places and complex for the community to understand. The measure around digital capability for example tells us that Australia needs to work harder on developing successful interventions to shift these metrics upwards if we are to obtain maximum benefit from the digital world we now live in. The practical nature of the research that ACCAN undertakes into account allows organisations such as Infoxchange and corporates such as Australia Post and Google to develop appropriate and informed interventions. Government is a beneficiary of this as well. Consider also the recent work that Infoxchange undertook in relation to the internet needs and affordability of internet for residents of public and social housing.⁴ The work undertaken here will allow public and social housing providers to understand the issues facing residents in relation to broadband access. Many of these providers see great efficiencies in having all residents online and this work helps them, Telcos and government agencies understand the issues at hand. Government in particular has a need to understand how residents of public and social housing use online services and as such it is entirely appropriate to fund this work through a body such as ACCAN. The question also would be, If not government then who would fund this work?

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

We would recommend an increase in the grant funding available and continue to target those most in need.

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?

No we don't believe so. This dual role is very important and careful consideration should be given to resourcing and impact of any additional roles.

⁴ <http://accan.org.au/our-work/research/1331-social-housing-and-broadband>