

25th November 2016

ACCAN Review

Department of Communications and the Arts  
PO Box 13310,

Law Courts MELBOURNE VIC 8010

www.communications.gov.au/have-your-say

To whom it may concern,

**Submission re: Consumer representation: Review of section 593 of the Telecommunications Act 1997 – Issues Paper**

Thank you for the opportunity for IoT Alliance Australia to submit a response to the Department of Communications and the Arts (DoCA) Issues Paper *Consumer representation: Review of section 593 of the Telecommunications Act 1997*.

**About IoTAA**

IoTAA is the primary, and indeed only, IoT thought leadership body in Australia. Its over 350 members are drawn from a wide cross-section of IoT service providers, vendors, consultants and suppliers as well as business, universities and consumer groups. Officers of the Office of the Australian Information Commissioner (OAIC), the Australian Communications and Media Authority (ACMA), the Australian Competition and Consumer Commission (ACCC), the Department of Prime Minister and Cabinet, the Department of Communications and the Arts and other Federal and State Government departments, authorities and other agencies also participate in IoTAA.

IoTAA is a registered not-for-profit entity currently hosted by the University of Technology Sydney (UTS).

IoTAA aims to define the IoT eco-system, informing and enabling Australian companies to exploit the business opportunities afforded by IoT technology and services, increasing Australia's innovation, productivity and economy. Our key objectives are to:

* drive sound, evidence-based input from industry into appropriate policy and regulation for IoT in Australia;
* recognise, understand and drive the national growth strategy underpinned by IoT enabling technologies, across key sectors of the Australian economy where Australia enjoys a competitive advantage; and
* promote collaboration at all levels including (but not limited to) between industry and Government, across the SME community, start-ups and investors, between service providers and problem/opportunity owners.

There are six IoTAA workstreams that undertake most of IoTAA’s work. The current six workstreams include the following areas.

1. Collaborative Australian IoT Industry

2. Smart Cities & Industries

3. Open Data & Privacy

4. Spectrum Availability & Licensing

5. Cyber Security & Network Resilience

6. IoT Start-Up Innovation

While this submission has been prepared by Workstream 1 participants, it may not reflect the views of individual participants in IoTAA or (if applicable) their employers. The officers of ACCAN participating in IoTAA did not participate in the development of this submission.

We welcome the opportunity to discuss our position in more detail with DoCA at your convenience.

Should you wish to discuss any aspect of this submission, kindly contact Frank Zeichner or Geof Heydon and they will coordinate our further input.

Yours sincerely,

Signature: Frank Zeichner, Executive Officer, IoT Alliance Australia.

Frank Zeichner

Executive Officer   
IoT Alliance Australia



Name and contact details of person/organisation making submission

Frank Zeichner, Executive Officer, IoTAA

General comments

Internet of Things (IoT) technologies and practices will transform the Australian economy, how businesses operate and conduct their business and how consumers interact with services. It promises massive economic opportunity, significant industry disruption and new consumer business models and services.

The effect of IoT on our businesses and lives will be profound over the next 5-10 years and will depend very much on how well users understand and trust the changing IoT paradigm of increasing levels of data collection, sharing, personalisation and new permission regimes – to mention a few. There is also a significant risk that many consumers will fail to understand or trust the new service models enabled by IoT and will become “disconnected”; creating another level of the digital (service) divide.

Consistent with IoTAA’s submission to the ACCC communications market study consultative paper[[1]](#footnote-1), we see IoT transforming how we see “telecommunications” from a domain hitherto driven by people-to-people voice communications (whether fixed or mobile) to one dominated by “things” connected to shared data repositories with myriad services delivered by existing service (telecommunications) providers and many new IoT service providers. In this context, the role of ACCAN as a principal consumer advocate and educator across telecommunications services and all encompassing IoT services becomes highly relevant and important.

We see ACCAN as a critical, competent and well-connected consumer voice to assist in the IoT transformation of Australian services and businesses – especially in the transition period over the next 5 years.

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

IoTAA is a relatively new organisation, and the deployment of IoT services to consumers is at relatively early stages. We are pleased that ACCAN is a member of IoTAA’s Executive Council where it will be able to represent consumer interests. We welcome its involvement and leadership in exposing user groups to IoT concepts and issues.

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

Our observation, to date, is that ACCAN is remarkably well connected across the diverse range of industry, government and other consumer groups. This is a prime asset and platform from which to understand the more complex IoT eco-system – necessary for developing simple-to-understand consumer awareness and education programs.

## 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?

IoTAA is a relatively new organisation. To date, ACCAN has shown a practical balance in representing consumers.

## 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?

IoTAA sees the strong need for a specific telecommunications/IoT savvy consumer-focused body as critical for the transition and evolution to well-understood and trusted IoT services.

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

Possibly, however, the complex telecommunications and IoT eco-system and the vast amount of partly very technical information to be absorbed and undersood, may make it difficult for a general consumer body to adequately perform this role. Very effective engagement and knowledge is required to translate awareness and use from industry to consumers, but importantly also to provide feedback from consumers to industry. ACCAN, to a large extent, already has engagement models in place and possesses a substantial amount of relevant knowledge.

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

Possibly, however measurement of consumer views is in itself a necessary but insufficient condition for ensuring industry alignment and consumer interests are met.

An important aspect of ACCAN is the periodic measurement AND continual engagement between consumer groups and industry. This allows industry and consumer education and awareness to change and adapt as new technologies, services and regulations develop.

## 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?

## 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?

We believe IGP funded research for consumer IoT issues, which are fast approaching, will be useful to consumers. There should be a role for industry and the IoTAA in helping to decide how the research funds are allocated- to help ensure they are deployed relevantly and usefully.

## 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?

It would seem logical to engage in deeper research regarding consumer issues regarding telecommunications through a consumer representative group – and indeed with a consumer group that is well acquainted with telecommunications practice and the key practitioners. As previously mentioned, the decision on how to use the funding would benefit from consultation with IoTAA and similar bodies.

## 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 believe that there is likely to be a greater requirement for building awareness and understanding of IoT-related consumer issues such as data privacy, consent to share data, security of services, to mention a few. As previously mentioned, the decision on how to use the funding would benefit from consultation with IoTAA and similar bodies.

## 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?

Awareness and education programs regarding IoT services will be necessary. These will be delivered by a variety of mechanisms. ACCAN would be a good avenue for consumers, especially where IoT services provide enabling capability for the disadvantaged – for example.

1. See https://static1.squarespace.com/static/573853ed1d07c093e27aefd2/t/581bc9df9de4bbc72a203287/1478216165211/211016\_IoT+Alliance+Australia\_Submission+to+ACCC+Communications+Market+Study+V1.3.pdf [↑](#footnote-ref-1)