

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

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Yes

Date of submission

29 November 2016

Name and contact details of person/organisation making submission

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General comments

Overall, **nbn co** supports the joint submission made by Communications Alliance Ltd (**CA**) and the Australian Mobile Telecommunications Association (**AMTA**), in their roles as peak bodies for the telecommunications industry. There are a handful of issues, however, on which **nbn** is in a position to provide an additional perspective view due to its unique circumstances. This submission sets out those views.

Response

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

**nbn** acknowledges ACCAN's work in representing the interests of consumers. **nbn** is keen to continue to work with ACCAN to improve ACCAN's knowledge and understanding on **nbn** matters, which will assist them in explaining them to member groups and the public.

ACCAN is the consumer advocacy group participant in **nbn**'s Product Development Forum (**PDF**). For ACCAN to participate most constructively, a deep understanding of **nbn**'s context is necessary, including in relation to **nbn**'s regulatory and commercial environment.

With respect to ACCAN's August 2016 submission on the current variation of **nbn**'s Special Access Undertaking (**SAU**), ACCAN focused on matters not within the scope of the variation process, leading to incorrect conclusions. For example, ACCAN's submission indicated that ACCAN had misunderstood the manner in which **nbn** already provides rollout information to access seekers and the public.

ACCAN is understandably focused on consumer concerns such as affordability, and has raised such issues in its submissions to some of **nbn**'s PDF consultation processes. However, some of these issues might be more advantageously dealt with as policy matters in other forums. **nbn** encourages ACCAN to consider the appropriate forum when raising particular issues, and to consider how consumer benefits may best be sought from a practical perspective.

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?

**nbn** would like to emphasise the point made by CA and AMTA in its submission that the quality of research undertaken by ACCAN through the IGP would benefit greatly from increased industry involvement in the identification of appropriate research projects.

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?

Should the current parameters of section 593 allow, **nbn** would welcome the use of existing funding to support the creation of service provider-neutral consumer education materials. The retail telecommunications market is complex, and consumers would benefit from assistance navigating the ever-increasing number of products and services available to them. With respect to services provided over the **nbn**<sup>™</sup> network, **nbn** continues in its efforts to provide consumers (as well as businesses) with the information necessary to make informed choices between retail offerings, however additional sources of such information are currently very limited.