

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

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Yes .

Date of submission

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Logo of organisation—if an organisation making this submission

Name and contact details of person/organisation making submission

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### General comments

The ICT environment has grown ever more complex over the past 5 years. This has meant that the consumer voice is even more necessary than usual. ACCAN has kept abreast of changes, and diversified the portfolio of work it does in order to meet these changing trends. At all times they have the diversity of consumer voices in mind, and have given valuable information to a range of ethnic groups as well as diversity groups. In addition, the work they do is of great importance to consumers in the lowest socio-economic strata.

### Response

1. Has ACCAN effectively performed the role of representing the interests of consumers in relation to telecommunications? YES, ACCAN has ably taken on the task of robustly representing the interests of consumers through forums, consultations and focussing their attention on sub groups more likely to be detrimentally effected by policies or programs proposed by Government

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

YES. I believe that ACCAN has maintained a high level of contact with an extensive range of stakeholders, including the TIO, Communications Industry, Department of communications, community sector and individual consumers on occasion. They make themselves available for enquiries

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?

I have been really pleased to see the level of contact and representation that ACCAN has maintained since its inception. The members of the advisory body to government which contributed to the development of the ACCAN consumer representation model, especially disability consumers, were very concerned about the potential to lose the input from specialist disability advocacy organisations, such as TEDICORE. It was seen as an important component of consumer representation because of the degree to which ICT Assistive Technologies are an important tool for consumers with disabilities. I have been pleased to see that the work ACCAN does has developed this facet of their work, and that it is a leading voice in international and national standards development where relevant. It is a leading organisation in conducting inclusive events, with live captioning, AUSLAN interpreters, routine use of Easy English, and in ensuring that its web resources all meet or exceed WCAG 2.0 guidelines. It has a network of significant contacts in these areas.

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?

Government funded representative body which caters for all consumers, including those with diverse ICT needs, is the best model. Consumers do not fit neatly into one or other specific need categories. The current model enables both mainstreaming and specialisation of expertise. ACCAN research program and forum program provide an excellent avenue for groups with special needs to address particular concerns as they arise, and the findings of any research is more easily and publicly shared through the ACCAN mechanism. This enables much better aggregation of information useful for all consumers.

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

The telecommunications industry is complex, services are complex, service providers continue to proliferate, the challenges of NBN, BIGDATA, require an organisation which has expertise in all facets of ICT. This would be lost if a general consumer body tried to carry out these functions, and the 20 million ICT consumers in Australia would feel this loss either directly or indirectly.

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

The government has a role to also undertake consumer research. It also has a role to undertake research into service provision, and infrastructure installation, etc. However, a representative consumer body is the most effective for conducting consumer driven research, and disseminating the results of research from a range of sources. It is most efficient for a consumer body to coordinate these efforts and to be the logical hub for information sought by consumers. In the disability sector there is a great reliance on the work that ACCAN does, because it does not have the expertise or resources. There is a great

sense of trust in the research results that ACCAN publishes and in its discussions with government policy makers. Consumer driven research is valued by consumer groups as an empowering tool.

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?

Yes! I have seen a number of important examples of where ACCAN funded work has influenced policy. Most importantly has been the work of Wilf Tibbins and Gunela Astbrink on ICT procurement. This has led to the convening of an Australian Standards Committee and the development of an Australian Standard which will come into force and improve the access to employment in both the public service and , by influence on the market, to the non-government sector. This has been an important development internationally. In addition IGP research into scamming of the Deaf community has led to changes in provision of information in AUSLAN. A third important piece of research was conducted into cyberstalking, and led to the set up of a Commission to coordinate work to reduce its incidence and effect. Other ACCAN work of notable importance is the removal of CAPTCHA as a means of user-identification, and removal of costs for calls to 1800 numbers. These had wide-reaching positive outcome for all consumers but particularly those in the disability sector.

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. Definitely. The IGP research program is effective and efficient but inadequately resourced for the increasing volume of work that could be done, given the increasing size of the ICT sector and its ever increasing importance in the lives of 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. Definitely. The community trusts ACCAN. ACCAN work is wide-ranging and highly effective. It is an effective efficient hub for consumers with interest in ICT matters, and its findings across all areas of its work benefit ALL consumers. The volume of issues raised with the TIO show that consumer interaction with service providers and agencies, mean that customer service needs a strong voice in the ICT sector. ACCAN provides that focus and voice.

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

I would recommend that base level funding as well as the IGP funding pool be increased to take into account the changing size of the sector and its increasing crucial importance to consumers. ACCAN delivers exceptionally good value for taxpayer money.

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?

Appropriate funding for the existing two areas under s593 would be an improvement for consumers.