



Industry Monitoring Section
Australian Communications and Media Authority
PO Box 13112 Law Courts Melbourne Vic 8010
Via email: telephone.service.regulation@acma.gov.au

January 2007

Re: Enhanced Call Handling Features under the *Telecommunications (Customer Service Guarantee) Standard 200 (No. 2)*

Thank you for the opportunity to provide some general comments as requested on the treatment of Enhanced Call Handling Features under the *Telecommunications (Customer Service Guarantee) Standard 200 (No. 2)*.

The Consumers' Telecommunications Network (CTN) is a national peak body of consumer and community organisations, and of individuals representing community interests, who participate in developing national telecommunications policy. We advocate policies for better access, quality of service and affordability of telecommunications facilities for all residential consumers. CTN's members are national and state organisations representing consumers from non-English speaking backgrounds, deaf consumers, indigenous people, low income consumers, people with disabilities, young people including children, pensioners and superannuants, rural and remote consumers, women and consumers in general.

The general purpose of the Customer Service Guarantee (CSG) is to protect residential and small business customers telephone services by requiring carriage service providers (CSP's) to meet performance standards and provide users with financial compensation when these standards are not met. CTN strongly supports the ongoing need for a well-targeted CSG and a complementary reporting regime that ensures CSPs compensate consumers where they fail to provide services in circumstances that are generally agreed to be fair and reasonable.

We consider the application of the CSG to enhanced call handling features is an integral component of this particular consumer protection mechanism. The letter CTN received from ACMA early this year indicated that Telstra has identified enhanced call handling features as a regulatory burden in another review. A CSP may be unhappy that it has an obligation to fairly compensate consumers when they fail to meet fair and uniform industry standards, but this is not the core purpose of the CSG and we do not see it as an appropriate trigger for a review of the entire CSG.

Enhanced call handling features are a key feature of a standard telephone service and of great use to those who pay to use these functions. Some of the enhanced call handling features can be of critical importance to end users. Call barring, for example, functions as a way for consumers to control the accrual of high phone bills by preventing access to high cost services. Requiring call barring to be enacted within a short timeframe can be critical in preventing high bills occurring. Similarly, calling number display and calling number display blocking are important ways for consumers to protect their privacy. If these functions were not activated within allocated timeframes and consumers unwittingly used these services, there could be any number of ramifications for the end user.

Accordingly, we do not think it is appropriate to consider removing the consumer's right to compensation where their service provider fails to provide enhanced call handling features within the times currently allotted under the CSG.

We hope these comments are of use to you. Should you wish to discuss this response in more detail please contact myself or Sarah Wilson at the Consumers' Telecommunications Network on 02 9572 6007 or at ctn@ctn.org.au.

Yours sincerely,

A handwritten signature in black ink, reading "Teresa Corbin". The signature is written in a cursive style with a long horizontal flourish at the end.

Teresa Corbin
CTN Executive Director

This submission was prepared by Sarah Wilson, CTN Policy Advisor, and Teresa Corbin, CTN Executive Director. It was approved out of session by the CTN Council.

