

14 February 2007

Industry Monitoring Section  
Australian Communications and Media Authority  
PO Box 13112  
Law Courts  
Melbourne, VIC 8010



To whom it may concern,

**Re: Comments on enhanced call handling features in relation to the Telecommunications (Customer Service Guarantee) Standard 2000 (No.2) (CSG Standard).**

Please find attached Communications Alliance's 'revised' submission in response to ACMA's request for comments on the CSG Standard. Our earlier submission, dated 5 February 2007, should be disregarded and replaced by this document version.

Yours sincerely,

Anne Hurley  
**Chief Executive Officer**  
Communications Alliance Ltd

**COMMUNICATIONS  
ALLIANCE LTD**

Level 9  
32 Walker Street  
North Sydney  
NSW 2060 Australia

P.O.Box 444  
Milsons Point  
NSW 1565

T 61 2 9959 9111  
F 61 2 9954 6136  
TTY 61 2 9923 1911  
[www.commsalliance.com.au](http://www.commsalliance.com.au)  
ABN 56 078 026 507

**COMMENTS ON ENHANCED CALL HANDLING FEATURES IN RELATION TO THE  
TELECOMMUNICATIONS (CUSTOMER SERVICE GUARANTEE) STANDARD 2000 (NO.2)  
(CSG STANDARD)**

**COMMUNICATIONS ALLIANCE**

**1. INTRODUCTION**

Communications Alliance is pleased to have this opportunity to provide comments on the enhanced call handling features in relation to the *Telecommunications (Customer Service Guarantee) Standard 2000*.

Communications Alliance Ltd is the result of a merger between the Australian Communications Industry Forum and the Service Providers Association Inc. which took place in September 2006. The vision of the new entity is to provide a unified voice for the Australian communications industry and to lead it into the next generation of converging networks, technologies and services. Its membership is drawn from a wide cross-section of the communications industry, including service providers, vendors, consultants and suppliers as well as business and consumer groups.

**2. RETHINKING REGULATION REPORT**

Communications Alliance understands that ACMA is carrying out the consultation at the request of the Minister for Communications, Information Technology and the Arts, Senator the Hon Helen Coonan as a result of a report released in April 2006 titled *Rethinking Regulation: Report of the Taskforce on Reducing Regulatory Burdens on Business*. As a result of this report, ACMA is now seeking comments on enhanced call handling features in relation to the Telecommunications (Customer Service Guarantee) Standard 2000 (No.2).

The report reviewed various areas of regulation, including social and environmental regulation. Consumer related regulation and the specific review of the Customer Service Guarantee were issues raised in the report.

The report made a recommendation that:

*ACMA should consult with all telecommunications providers as part of a review of the need for regulation of connections to specified services, in the context of wider development of the market for these services.*

It is also Communications Alliance's understanding that no specific discussion paper, or set of questions has been posed by ACMA for this process.

Communications Alliance's submission therefore has opted to provide a number of general comments about the enhanced call features within the CSG Standard.

**3. CSG AND ENHANCED CALL HANDLING FEATURES**

Communications Alliance recognises that the government agreed to the Rethinking Regulation recommendation in principle, noting that it considered no requirement

for change in the current arrangements relating to CSG connection times was needed.

We note that the CSG is a legislative requirement for carriage service providers providing fixed telephone services to consumers with five services or fewer. It is a standard designed to provide incentives for industry performance in relation to fixed telephone connections and repair times. The CSG Standard sets out maximum timeframes within which eligible services should be connected and repaired, unless circumstances beyond the control of a CSP, such as natural disasters, prevent this. Performance standards also apply to attendance at appointments. Compensation is payable for breaches of the CSG performance standards.

The term 'enhanced call handling feature' is defined under section 4 of the CSG Standard as meaning any of the following features when activated by a carriage service provider:

- call waiting (enabling a customer to receive a second call on a telephone service while engaged on a call);
- call forwarding (causing a call directed to a number to be redirected to a stored number);
- call barring (enabling a customer to control access to some, or all, network numbers before a call is established), but not a call barring option that a carriage service provider programs into its network;
- calling number display (enabling a customer to identify the number of a calling party);
- calling number display blocking (enabling a customer to prevent the display of his, her or its number to a called party).

Communications Alliance submits that the CSG Standard should not apply to any enhanced call handling features. Communication Alliance believes that the application of the CSG Standard to apply to any or all of the enhanced call handling features under Section 4 of the CSG Standard is unnecessary and imposes unwarranted additional regulatory and financial burden on an already over-regulated telecommunications industry.

It is important to note that in the report, *Rethinking Regulation, Report of the Taskforce on Reducing Regulatory Burdens on Business*, the Taskforce states "no regulation should be introduced unless the need for government action and the superiority of the preferred option have been transparently demonstrated."

#### **4. CONCLUSION**

Communications Alliance submits that the application of the CSG Standard to enhanced call handling features goes beyond the bounds of what is necessary and reasonable regulation.

Ends...