

**Communications Alliance &
Australian Mobile Telecommunications Association (AMTA)**

Response

to

**ACMA Discussion Paper “Calls to Freephone and local rate numbers –
The Way Forward”**

December 2011



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About Communications Alliance

Communications Alliance is the primary telecommunications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, equipment vendors, IT companies, consultants and business groups.

Its vision is to provide a unified voice for the telecommunications industry and to lead it into the next generation of converging networks, technologies and services. The prime mission of Communications Alliance is to promote the growth of the Australian communications industry and the protection of consumer interests by fostering the highest standards of business ethics and behaviour through industry self-governance.

For more details about Communications Alliance, see <http://www.commsalliance.com.au>.

The Australian Mobile Telecommunications Association (AMTA)

The Australian Mobile Telecommunications Association (AMTA) is the peak industry body representing Australia's mobile telecommunications industry. AMTA's mission is to promote an environmentally, socially and economically responsible and successful mobile telecommunications industry in Australia. AMTA members include mobile Carriage Service Providers, handset manufacturers, retail outlets, network equipment suppliers and other suppliers to the industry.

For more details about AMTA, see <http://www.amta.org.au>.

1. Executive Summary

Communications Alliance and AMTA ("the Associations") provide this submission in response to the ACMA Discussion Paper: "Numbering: Calls to freephone and local rate numbers. The way forward" released in October 2011.

The Associations support the underlying objectives of the ACMA and the consumer organisations that raised concerns with the ACMA about the cost of calls from mobile handsets to freephone and local rate numbers (FLRNs). We surmise that a core issue among those concerns is a desire to ensure that consumers are not disadvantaged by the cost of such calls, particularly when the calls are to Government agencies or are of an urgent nature.

The Associations believe that the proposal advanced by the ACMA is not the most effective way to meet those objectives.

As the ACMA signalled in its Discussion Paper (p.11) its proposal, if implemented, would have impacts on a range of sectors. The Associations contend that those impacts will bring unintended consequences that outweigh any benefits that may be derived.

The ACMA Discussion Paper also fails to take sufficient account of the marketplace dynamics, commercial developments and alternative access mechanisms that are, to varying degrees, already addressing the issues identified.

As detailed herein these factors include:

- continuing reductions in the cost of calls from mobile handsets in Australia;
- the growing trend for mobile calls to FLRNs to be part of the 'included value' component within mobile cap plans – including some pre-paid plans - thereby further significantly reducing the cost of the call;
- the many alternatives to using a mobile handset to reach FLRNs.

The Associations are pleased to respond to the ACMA's invitation to put an alternative proposal to meet the ACMA's objectives for consumers.

The Associations recommend that:

1. The Federal Government direct that Agencies and Departments operating FLRNs offer call-back arrangements so that customers calling from mobile telephones are not forced to endure long waiting periods, and work through the Council of Australian Governments (COAG) to encourage State Governments to take similar action.
2. Government Agencies be measured on and required to report publicly on the waiting times experienced in their call centres and progress against benchmarks.
3. The ACMA consider the introduction of new number ranges or range sub-sets, to provide zero-rated or low fixed-fee calls that can be offered by organisations that wish to ensure free or low-cost access for their customers.
4. The ACMA and industry agree to further explore a potential solution involving the creation of a single zero-rated telephone number/phone name that terminates on a management platform and routes calls to the relevant Agency.
5. Existing FLRN services be renamed to better reflect their characteristics.

2. Extent of the Issue and Alternative Access for Consumers

The debate around mobile calls to FLRN services has suffered to date from a shortage of any substantive data on the extent of the problem.

In recent questioning during a meeting of the ACMA's Consumer Consultative Forum (CCF), ACMA management stated that the Authority was receiving approximately two complaints per month from consumers about the cost of mobile-FLRN calls.

Communications Alliance has sought data in November 2011 from the Telecommunications Industry Ombudsman (TIO) about the volume of complaints it currently receives on this issue. The TIO has said that it is presently unable to quantify the volume of such complaints.

It is clear that some consumers are choosing to use a mobile phone for all their calling and giving up their fixed line service. However, this is generally done on the basis of weighing up the costs and benefits of such an arrangement and calls to FLRNs from mobiles are one cost of that choice that is taken into account and offset by the benefits (savings) the consumer sees with a mobile-only arrangement. The fee structures for fixed line and mobile services differ substantially and for emerging VOIP services, there is again substantial difference. Mobile satellite services also have their own fee structure. The various fee structures typically reflect underlying cost drivers, although in the case of fixed line services, there is a market distortion introduced via the untimed local call obligation that applies to traditional (i.e. PMG era) fixed voice services.

The charging plans for mobiles also differ substantially – with key differences between pre-paid and post-paid plans, in the way that calls to FLRNs are charged (timed and untimed) and in how the charges for such calls may be attributed to the value of calls included in the plan. As an example, the Optus \$2 Day plan charges a fixed fee for calls to most FLRNs and any such calls are included in the calls that can be made up to the maximum \$2 charge in a single day. The ACMA discussion paper is substantially deficient to the extent of being misleading, in that it has failed to highlight these low cost alternatives and at the same time has incorrectly quoted a fee of \$1.78 per minute for calls from Optus prepaid mobile services. The Optus standard agreements current at the date stated in the ACMA numbering discussion paper No 1 has no plan with a calling rate of \$1.78 per minute, the maximum timed rate being less than half that amount. Given that the \$1.78 figure has been substantially quoted by ACCAN, the effect of the error has been compounded. There is a real risk that these errors and omissions have distorted the consultation process to the extent that it is now difficult for an objective public process to take place.

ACMA research suggests that mobile phones are most frequently used to call mobile numbers, while landline phones are most frequently used to call landline or local numbers. Computer calls are mainly made to Voice over Internet Protocol (VoIP) ID or VoIP user names and overseas numbers¹.

¹ http://www.acma.gov.au/WEB/STANDARD/pc=PC_312527 – ACMA Consultation Paper 4 - Community research into consumer behaviours and attitudes towards telecommunications numbering and associated issues

Additional findings include:

- Calls to 13/1300 and 1800 numbers are relatively infrequent, with most calls to these numbers being made less often than monthly. For the small group who makes these types of calls at least weekly, they use home phones more often.
- Cost and convenience appear to be the key drivers when deciding which telecommunications service (mobile, home phone or computer) to use to call different numbers.

Whilst acknowledging the trend of fixed to mobile substitution, ACMA research indicates that approximately 86% of household consumers have a fixed line telephone at home as at June 2010².

While large numbers of customers now use mobiles for their regular calling, including to FLRN services, a range of alternatives exist for contacting these services. These include:

- making calls to FLRN services from a payphone, or other fixed type service including VoIP;
- call-back arrangements whereby customers can leave their number with the FLRN and receive a call in return;
- use of services that allow the customer to send a SMS to a community service provider, or government agency who will then call them back; and
- dedicated websites and/ or pages on social network websites.

The diversity of communications methods will only increase in the future. Governments have foreshadowed increasing engagement with the community via accessible websites and already today community service providers are engaging with their customers via new media such as social networks (e.g. Facebook) as well as their own websites. These models allow low cost access to services through online text and/ or voice dialogue.

One issue cited as a cause of hardship for mobile callers to FLRN services is the circumstance where mobile callers find themselves placed into a lengthy call queue, for example when calling Government departments or agencies such as Centrelink. The resulting delay can add significantly to call costs, but this impact is not attributable to mobile service providers, but rather to the inability or unwillingness of agencies to manage their call volumes and call centre resources in such a way as to minimise call-waiting times.

To overcome this issue, one option that the Associations believe should be further explored in any event is for Federal and State Governments to direct relevant agencies to ensure that call-back options are made available to all callers – or at least to all callers using mobile handsets.

Further, Governments may wish to consider measuring their Departments' and agencies' performance in term of call queues and call waiting times – and seeking public reporting of these data and on progress towards benchmarks - to ensure that consumers are not being generally disadvantaged.

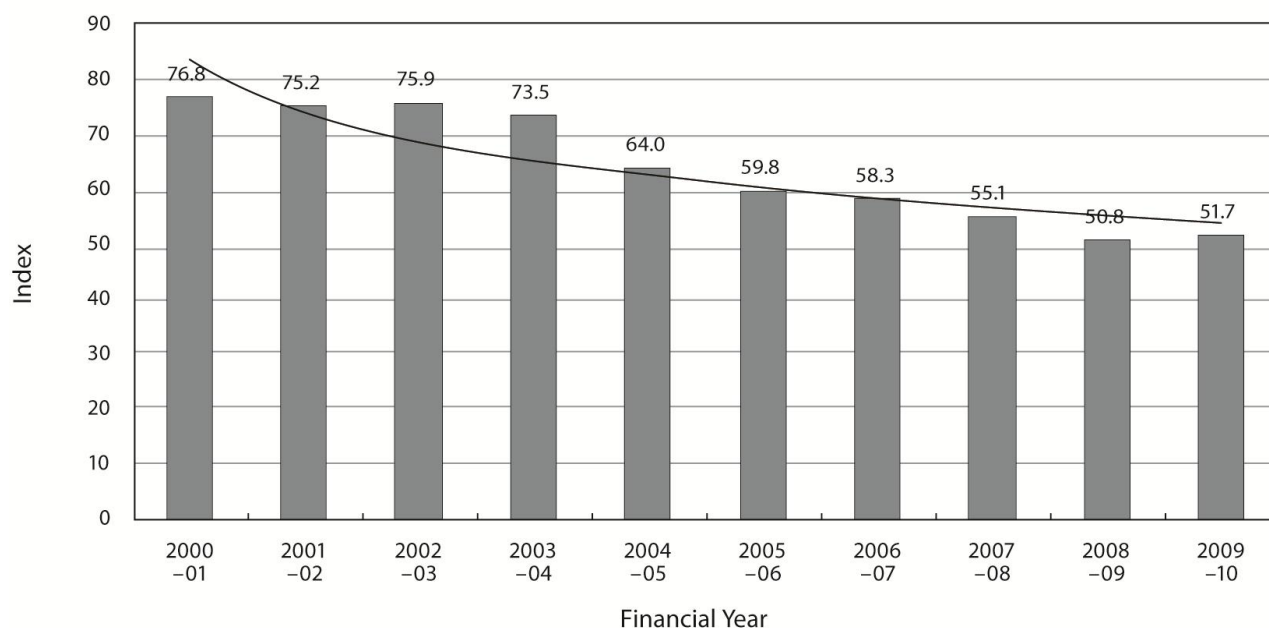
² http://www.acma.gov.au/webwr/assets/main/lib310665/report_2_take_up_and_use_of_voice_comms.pdf - ACMA Communications Report 2009-2010 Series Report 2 Take-up and use of voice services by Australian Consumers, Figure 2.

3. Price reductions/Inclusions in Plans

The usage of mobile phones in Australia has increased dramatically over the past 10 years, while the average cost of using mobile services has declined significantly over that time.

The following table, "Figure 5.1" from the ACCC report *Changes in prices paid for telecommunications services 2009-10*, illustrates the downward trend in prices for mobile services in the decade to 2009-10. Average mobile prices have declined by 48.3 per cent since 2000-01.

Figure 5.1 Overall mobile services index, 2000-01 to 2009-10



Further, all three mobile carriers now offer post and pre-paid mobile plans in which calls to FLRN numbers are included in the "included value" element of the plan, thereby making it more affordable and equivalent to mobile calls in general even though these calls represent on average a small component of all mobile calls.

This trend for such price reductions to extend to pre-paid plans is expected to continue – thereby addressing the concern raised by ACCAN that vulnerable consumers are more likely to be pre-paid customers and therefore unable to access cheaper rates for calls to FLRN services.

Some examples of such plans include:

Telstra offer Freedom Connect and Encore plans:

<http://telstra.com.au/mobile/>

<http://www.telstra.com.au/my-offer-summaries/download/document/my-offer-summary-pre-paid-mobile-offers.pdf>

Optus offer Pre-Paid \$2 Days and Post-Paid 'Yes' - Social Plans:

<http://www.optus.com.au/aboutoptus/About+Optus/Legal+%26+Regulatory/Standard+Forms+of+Agreement/Personal/Mobile/Mobile>

Vodafone Infinite and Cap plans all include calls to 13/1800 numbers as a component of the included value provided by the plan. The Vodafone \$100 Infinite plan allows unlimited calls to 13/1800 numbers as well as to all other Australian public numbers when in Australia.

<http://shop.vodafone.com.au/mobile-details/buy-nokia-n9-64GB?pid=v:plans:inf:inf:bod:nokia-n9-64gb-50-10--img-cta>

4. Dislocative Effects of the ACMA proposal on Industry, Small Business and Consumers

Implementation of the ACMA's proposal would be enormously disruptive to tens of thousands of Australian businesses who currently offer FLRN service access to their customers. Given the current ebb in the business cycle, this is not an ideal time for regulators to be causing unnecessary disruption to Australian business. The flow-on effects of this disruption and the changed economics of FLRN service provision would almost certainly also have unintended detrimental effects on business and consumers.

As at 7 November 2011 there were 317 987³ active FLRN services in operation (SIOs) in Australia, broken down as follows:

1300	=	195 237
13	=	2 222
1800	=	120 528

Businesses that offer FLRN access to their customers and other callers today do so on the basis of commercial agreements with carriers and/or the carriers' downstream resellers. These businesses balance the additional costs of providing FLRN access (compared with simply accepting incoming calls from a standard geographic or mobile number) against the potential increased commercial revenues that often flow from the greater ease of inbound access inherent in offering an FLRN service.

It is likely that many businesses – particularly small businesses – would opt to abandon their FLRN services if they were faced with a significant increase in the cost of providing those services – such as could flow from the FLRN business model being forced to accommodate the provision of free or local rate calls from mobile handsets.

In this scenario the commercial health of these businesses would potentially be damaged. User of fixed and mobile services wanting to contact these businesses would find it less convenient to do so, and those using mobile handsets would pay normal mobile rates for their calls – a “back to square one” situation.

There are at present approximately 100,000 commercial contracts in place between carriers/resellers and the businesses and organisations that offer FLRN services. The customers include large corporations, small businesses, State and Federal Government Departments and Agencies, local governments and agencies, charities, community-based organisations and others.

These are typically long-term contracts of between 3 and 5 years duration. A significant proportion of these contracts are customised, rendering complex the task of renegotiating these to change the business formula so as to accommodate the ACMA proposal. Even renegotiating the 'standard' contracts is an involved process, with potential for dispute, delay and additional cost.

In order to renegotiate the body of extant FLRN commercial contracts within a calendar year, in the order of 400 agreements would need to be renegotiated every working day – a huge and costly task that is probably beyond the capability of any industry sector in Australia – including the telecommunications sector.

³ Source: Industry Number Management Services (INMS), PSD Usage Summary Report, snap shot as at 7/11/11

5. Alternative Paths to Achieve ACMA/Consumer Objectives

The Associations propose that, rather than amending the costing basis for existing FLRNs, other alternatives should be explored, as a means of achieving the objectives outlined by the ACMA and consumers groups, but while recognising:

- the extent to which alternative access technologies,, pricing patterns and the benefits included in modern mobile service plans (see Section 3 of this submission) are already addressing these issues; and;
- the need to avoid the commercial dislocative effects, outlined in Section 4 of this submission, that will flow from implementing the proposal advanced by the ACMA.

Two options for alternative solutions are outlined in this section, but it is possible that ongoing dialogue with the ACMA and consumer representatives will throw up additional options or variations on the ideas discussed below.

If the ACMA considers that there is a need for a different pricing structure for FLRNs, one potential mechanism would be to explore the creation of a new number range on which mobile originated calls to FLRNs would be zero-rated and/or offered at a fixed low fee. FLRN customers could migrate to the new number range if they choose to do so. Specifically, a new inbound number subset could be used from within the existing 18 range (or another range), or a new prefix could be created (e.g. 14/1400/1700).

Inbound call service operators could choose to offer all inbound number ranges to their customers. Those inbound call service customers who require that the public can call them for free or at a low fixed fee from mobiles could select numbers from the proposed new inbound number range.

Required implementation arrangements:

- Mobile Outbound operators and FLRN Inbound operators first will need to set up new interconnection arrangements.
- FLRN Inbound operators will need to factor in the cost of mobile originated calls and conditioning of their networks.
- FLRN Inbound operators will then be able to provide to their customers greater transparency of the cost involved in terminating mobile originated calls to them which will allow Inbound customers to factor in the additional costs of calls made to them using the new inbound number range.
- FLRN customers will have the choice and flexibility of using the new inbound number range for providing free or toll-free calls to consumers calling them from either a fixed or mobile service.

As with any new number range, it would be important that industry works together to put in place all the necessary arrangements.

The Associations would expect that Government organisations would be among the first to adopt these numbers. If this proposal were pursued it would seem appropriate that the ACMA obtain commitment from Government Departments that this would occur. This would give the industry confidence that the new services will be utilised and that the costs of establishing these new services can be recovered.

Notwithstanding the effort required to create and implement a new number range, industry believes that the overall cost and impact of this proposal would be substantially less than trying to change the current FLRN arrangements, including interconnection between carriers, FLRN service providers, and FLRN customers.

Another option that the Associations believe merits further exploration – particularly in terms of ensuring low-cost or zero cost access to Government agencies such as Centrelink – is that contained in the submission of 30 November 2011, to the ACMA from Mr William Tys of 1800PhoneHome, entitled: “A Solution to the Super Complaint Lodged by ACCAN, AFCCRA and ACOSS to the ACMA on 10 September 2010”.

The proposal is for the Government, with support from Carriers, to provide a single zero-rated telephone number/phone name (e.g. 1800 FREECALL) that terminates on a management platform and routes the call to the relevant organisation/Government agency.

The Associations are in discussion with Mr Tys. While numerous details would need to be further developed in cooperation with the ACMA and the Government, the Associations commend Mr Tys and believe this option should be looked at closely.

6. Need for a Broader Examination of Consumer Safeguards

The ACMA has presented its proposal as a consumer safeguard designed to reflect changes in consumer usage of telecommunications services and to improve price transparency for consumers.

The Associations note that there exists in Australia an extensive framework of consumer safeguards that have been applied to telecommunications services over many years.

The protections are enshrined in the Australian Consumer Law, the Communications Alliance Codes, such as the Telecommunications Consumer Protections (TCP) and Mobile Premium Services (MPS) Codes. These consumer safeguards include, but are not limited to:

- Customer service guarantee
- Pre-selection
- Do Not Call register
- Untimed local calls
- Universal service obligation

Many of these safeguards are far less relevant today than when they were introduced, due to changes in consumer usage patterns, market structures, technologies, product offerings and other factors. Those safeguards which are less relevant or irrelevant continue, however, to impose a regulatory and cost burden on industry – an economically inefficient situation which ultimately does not benefit consumers.

If the ACMA wishes to introduce new and additional consumer safeguards in the mobile services sector (where price controls have not previously existed) then this is a policy matter and should be considered only as part of a broader examination of the consumer safeguard framework across the entire sector, with a view of removing all those that are no longer.

7. Issues not covered in ACMA Paper/Regulatory Impact

In the ACMA's Proposal, the historical reason given for the creation of FLRNs was to assist:

"businesses and other organisations using these numbers to attract calls, on the basis that they were more affordable than alternative means of contact, particularly for rural and regional callers or for interstate callers who might otherwise have needed to make a long distance call".⁴

For the proposed decision to change the Numbering Plan to constitute a proper exercise of the power conferred by the Act, among other things, the ACMA should consider all relevant matters and not consider any irrelevant matters.

The Proposal contains no information on whether:

- the need for an alternative affordable means of contact still exists (given the significant reductions in STD/long distance call rates since the advent of FLRNs); or
- changing the definitions could result in behaviour inconsistent with the stated reason for originally including the FLRNs.

For example, an obvious relevant question is how many customers issued with FLRNs are likely to cancel their services if faced with bearing mobile originating costs? This would be a relevant point for the ACMA to include in public consultation on the change under s 460.

The ACMA's reasons for removing the mobile call carve-out appear to be primarily based on the increased use of mobile originating calls to FLRNs. The ACMA does not identify whether the fact that the FLRNs are failing to provide a more affordable alternative means of contact is also a driver. In other words, there is no information given on whether end users cannot use landlines to call the numbers or whether they choose to use mobiles to make calls to the numbers. This is another relevant issue for the ACMA to address.

While the Numbering Plan goes into the minutiae of number management activities associated with FLRNs, it does not identify any specific charging principles relating to them; unlike some other number types.

If the ACMA decides to pursue its proposal, industry would seek transparency around the scope and contents of the mandatory Regulation Impact Statement.

⁴ Proposal, page 2.

8. Change FLRN Product Names to Better Reflect Usage Reality

The Associations agree with the ACMA that the nomenclature of freephone and local rate numbers may create consumer confusion. The Associations propose that these number types be renamed to better reflect usage reality. When the new numbering arrangements were reviewed in 1992 by Austel⁵, the 1800 range was introduced to replace the 008 number ranges. While the definition was changed to “Freephone” services (because Telecom Australia Freecall 008 was trade-marked) the correct title of this service was “Inward Wide Area Telephone Services” which was a service for fixed lines. This service, like the emerging mobile service was defined as “special services”. To reflect the purpose of these service to be used with fixed line services, we suggest the new names should be:

- “Ubiquitous Fixed Inbound – No Flagfall” for 1800 services; and
- “Ubiquitous Fixed Inbound with Flagfall” for 13/1300 services.

⁵ Austel October 1992 report “Australia’s Telephone Number Plan – How your telephone numbers will change and when”

9. Cost basis underlying prices charged for mobile calls to FLRN services

The Australian Competition and Consumer Commission (ACCC) has for many years modelled mobile and fixed access. It is well understood and entrenched in the regulated access regime that mobile networks have a significantly higher cost base than fixed networks. This sets a fundamentally different floor interconnect/access price for mobile networks compared to fixed. This key difference appears to be ignored in the ACMA's study of FLRN-related issues.

The underlying access arrangements are also fundamentally different between fixed network and mobile network services at the customer level. Fixed network customers pay a monthly access charge to their operator (typically in the form of a monthly line rental fee), whereas mobile customers typically do not pay a monthly access fee, as this is built into call charges. In the case of mobile-originated calls to FLRNs the underlying access costs are partially covered by the mobile originating access revenue from FLRN operators.

The industry FLRN structure has been developed over two decades⁶ with significant investment poured into the infrastructure, intelligent FLRN network capability, people and marketing. These arrangements have enabled FLRN customers to meet their call management routing and termination requirements. A schematic summary of the additional intelligent routing infrastructure underlying FLRN services is provided at Attachment 1.

The ACMA proposal would be both costly to implement and highly disruptive to established industry and FLRN customer arrangements.

The actual cost to industry is difficult to establish with precision because of commercial arrangements in place. However as an industry we provide the following guidance to the ACMA on the significant cost to change the current arrangements and to recover the shift in mobile revenues that will take place from calling customers to FLRN customers. This will apply to all FLRN customers and for all calls.

Impact & cost of transition arrangements

- **Physical Elements:** including changes to all FLRN associated systems and processes including billing systems, information technology (IT), rating of calls, changes to call plans both FRLN and mobile. An IT change of medium complexity, for example, can cost upwards of \$3 million for an individual carrier and take in the order of 300 days to design, build and implement.
- **Customer Contract Renegotiation:** Reviewing, renegotiating and updating approximately 100,000 individual commercial customer contracts would be a lengthy, complex and expensive exercise. To complete this task within a 12 month period would require something in the order of 400 contracts to be renegotiated each and every business day. Even at a conservative cost estimate of \$1000.00 for each contract renegotiated, the initial cost would be in the order of \$100 million. Added to this cost would be the cost of creating new application forms and training materials, the training of customer-facing staff and the revenue lost from FLRN customers who opt not to continue offering FLRN services to their customers. While the cost will

⁶ ACMA, *Numbering: Structure of Australia's telephone numbering plan* (October 2010), available at http://www.acma.gov.au/webwr/assets/main/lib311975/ifc36-2010_module_one-structure_of_aust_telephone_numbering_plan.pdf at 28 November 2011. Page 11 notes that 13/1300 numbers were introduced in the late 1980s.

vary for individual FLRN operators it is likely to be in the same range as the physical elements cost above.

- **New Interconnect Arrangements:** If the mobile call charges are zero rated this will necessitate changes to originating access charges. Mobile Outbound operators and FLRN Inbound operators will have to set up and agree to new interconnection arrangements – again a lengthy and expensive process. Whatever the arrangements are, there will be mobile revenue that will have to be recovered from all FLRN customers. Even a small increase in originating access will result in significant annual cost.
- The ACMA should perform a proper full cost-benefit analysis before imposing these significant changes and cost on the industry.

10. Potential Devaluation of Spectrum

The Government anticipates holding spectrum auctions during 2012 as a means of allocating the 700MHz band "Digital Dividend" spectrum, which has been earmarked to meet the urgent need for increased spectrum for mobile data services.

The ACMA is effectively stating that:

- A in an industry with a better track record than the fixed network in reducing prices to customers, the ACMA is proposing to intervene to fix some prices.
- B the ACMA will take the unprecedented step of using the Numbering Plan as the tool for imposing price controls.

Such unprecedented regulatory interference in market price setting creates considerable uncertainty about the scope and scale of future mobile price setting by the ACMA. If the ACMA proceeds with its proposed changes to the Numbering Plan, revenue forecasts for the mobile industry will be subject to a new and substantive sovereign risk.

The ACMA and the Federal Government should also be aware that were its FLRN proposal to be implemented, this may cause potential bidders for the Digital Dividend spectrum to revise downward their estimate of the commercial value of that spectrum.

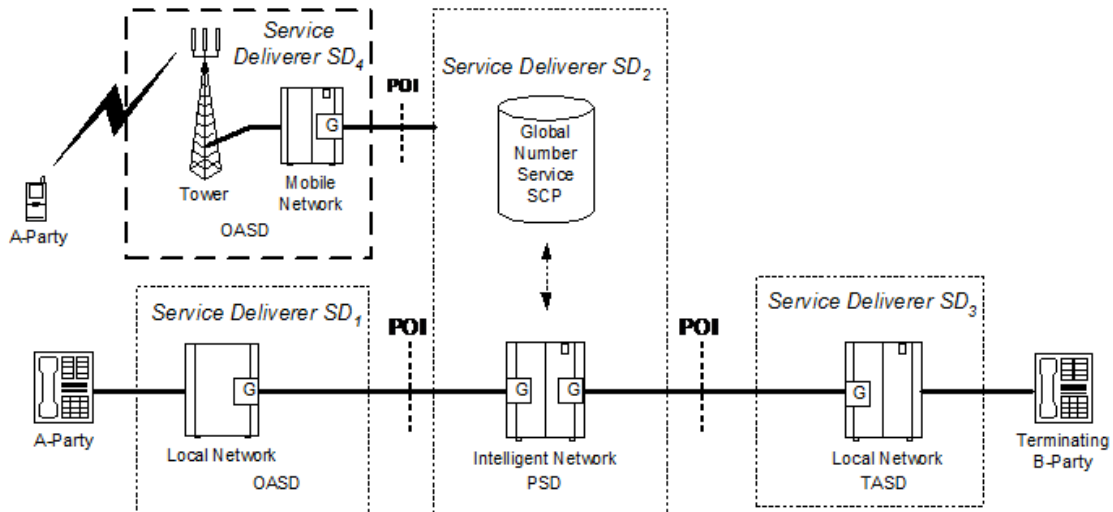
Attachment 1. – Call routing and interconnection for FLRNs

Example (d): Global Number Services 13, 1300, 1800, 180x With Number Portability

In this scenario, a call to the global number service is routed (by reference to a local copy of the national reference database for number allocations to SDs) to SD₂, the provider of this particular global number service. The identity of SD₂ is determined by analysis of the complete dialled number. The call may originate on a fixed network, SD₁, or mobile network SD₄.

SD₂ uses its Service Control Point database to translate the dialled global number to a geographic network terminating number N_G, corresponding to the terminating B-Party number.

SD₂ then routes the call to the Terminating Access Service Deliverer SD₃ identified by the B-Party number.



Principle

Status of Parties

G15 CC = B-Party
 G3 PSD = SD₂
 G5 SSDs are OASD = SD₁
 or OASD = SD₄
 and TASD = SD₃

Key to Acronyms:

CC = Commissioning Customer
 G = Gateway Function
 OASD = Originating Access SD
 POI = Point of Interconnection
 PSD = Primary SD
 SD = Service Deliver
 SSD = Supporting SD
 TASD = Terminating Access SD

Interconnection Responsibilities

G3: SD₂ as PSD is accountable to the B-Party for the performance of the call.

G15: The OASD hands over the call to the PSD at a Point of Interconnection nearest to the A-Party location, unless otherwise agreed between the SDs.

G15: The PSD hands over the call to the TASD nearest to the B-party location, unless otherwise agreed between the SDs.