

IPND Code Public Comment - Optus

Hi Craig and WC members, Optus' comments are below:

4.3 Rules for Data Transfer – Use and disclosure of data transferred from the IPND Manager

4.3.3 When a Data Provider sends an update to the IPND Manager that causes a Number to change status from Listed Entry to Unlisted Entry, or Suppressed Address Entry to Unlisted Entry, the IPND Manager must:

- (a) accept this update as valid;
- (b) notify relevant Data Users that a particular Number has become an Unlisted Entry by a notification that will only include:
 - (i) the Number;
 - (ii) date of change to an Unlisted Entry;
 - (iii) the list code; and
- (c) not provide any other PNCD associated with the Number to providers of Directory Related Services.

Optus comment – this requirement fails to take into account any downstream impacts of changing an entry from Listed Entry to Unlisted Entry. For example, a CSP updates the IPND with a new record showing customer's listing preference Listed, the IPND Manager then supplies this information to a Data User and the customer's Name and Address are published for example, online or in a print directory. The customer then informs the CSP they want to change their listing to Unlisted, the CSP then sends an update to the IPND manager changing the listing to UL. As the IPND Manager has earlier supplied the customer's information to a Data User, we think the IPND Manager should immediately inform the Data User of the change in status to Unlisted and also request the UL is removed from the Data Users own database. This process will reduce the risk or likelihood of the customer experiencing any hardship or injury as a result of their listing remaining online after they requested their CSP to change their listing preference.

Optus therefore recommends including a new requirement for the IPND manager to also notify and require Data Users to immediately remove the Unlisted Entry from their databases and where possible immediately remove the Unlisted Entry from any publications or otherwise not disclose the Unlisted Entry.

5.3 Data Reconciliation

Amend the timeframes so they promote a streamlined and timely process for reconciliation and updating for both the IPND manager and the CSP. Optus suggestions are below:

5.3.3 The IPND Manager must extract PNCD referred to in clause 5.3.1 and 5.3.2 at a time agreed to with the Data Provider and provide the PNCD to the Data Provider within a reasonable timeframe, not exceeding **15 Business Days** from the agreed time of the PNCD extract.

Optus comment – To enable CSPs to reconcile and update PNCD within the timeframe contemplated in 5.3.4, we suggest the IPND Manager should provide the PNCD to the CSP within two business days from the agreed time of the extract.

5.3.4 Data Providers must Reconcile the extract of the PNCD referred to in clause 5.3.1 and 5.3.2 and amend any discrepancies between the PNCD and the relevant CSP Customer data by sending updated PNCD to the IPND Manager within **15 Business Days** of the PNCD extract being downloaded.

Optus comment – As mentioned above this may not be practical depending on when the data is made available. We suggest 30 to 40 business days is a reasonable maximum timeframe for CSPs to amend discrepancies. This timeframe for the overall process is broadly equivalent to the draft code timing of 30 business days.