



COMMENT ON COMMUNICATIONS ALLIANCE MPS CODE
May 2019

Aboriginal people living in remote regions are more vulnerable than most consumers of mobile phone services, and have proven to be particularly vulnerable to the more predatory business practices of Telcos and premium billing services.

This is due to a range of factors, including:

- Reliance on pre-paid phone and data plans. There is no way of ascertaining what prepaid phone credit is used for, including premium billing services.
- Shared device usage, with the “owner” of the simcard/phone not necessarily being the one who has subscribed to a premium billing service. Very often it is a child or other family member who has inadvertently subscribed to these services, incurring costs and charges that are unknown and are not trackable back to source or subscriber.
- Very high turnover of phone and simcard ownership.
- No recourse for charges incurred. If these charges can be identified, Telcos refer users to the premium billing service. These are often based overseas, and are unresponsive to requests to unsubscribe from their service. The time, skills, and connectivity availability it takes to pursue unsubscribing from PBS is not available to many people, including Aboriginal people living in remote regions.

ACCAN have identified a general low level of consumer awareness about premium billing services. This is compounded by linguistic and cultural factors that impact specifically on Aboriginal people, deepening and entrenching financial and digital disadvantage. English is a third or fourth spoken language for many remote Aboriginal people, with poor literacy and numeracy compounding the issues.

A default limit of \$0 – basically an opt-in model for premium billing services – would go some way towards addressing the issues with these services for many people.

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