



**BROOME CIRCLE**  
*Step into the circle*



*Submission to the*

**Communications Alliance LTD**

*Call for Public Comment - Draft Industry Code: Telecommunications  
Consumer Protection Code*

DR C628:2018 - Telecommunications Consumer Protections (TCP) Code

## **1. Introduction**

MoneyMob Talkabout and Broome Circle are pleased to provide comment in relation to the 2018 review of the Telecommunications Consumer Protection Code.

MoneyMob Talkabout is a not-for-profit financial counselling and capability agency, funded by the Department of Social Services (Cth), The Department of Human Services (Cth), The Department of Human Services (SA), the Department of Premier and Cabinet (SA), ASIC and Good Shepherd Microfinance. Our agency works solely with remote Indigenous people in the Anangu Pitjantjatjara Yankunytjatjara (APY) Lands of northern South Australia to assist people in financial crisis, provide financial literacy education and build financial resilience.

Broome Circle provides key community services and social support across the region, including financial management and capability services to people in financial crisis. It has a Financial Management Team composed of two financial counsellors and three financial capability workers who cover the Broome region plus remote Aboriginal communities on the Dampier Peninsula north of Broome and also to Bidyadanga, the largest Aboriginal community in Western Australia, located 200 km south of Broome.

The respective client bases of our two agencies comprise largely or solely regional and remote Indigenous people and together we are well placed to make evidence-based observations and recommendations to this inquiry.

### **APY Lands Overview**

The APY Lands has a population of approximately 1,905 Aboriginal and/or Torres Strait Islander Australians. Unemployment in this region is at 25.4 % with only 20.4% of the population reaching the final year of schooling. School attendance on a whole across the region is at around 33%. A large majority - 80% of people in the area - speak an indigenous language, while English is spoken by 4% of the population. A majority of families earn an income within the bracket of \$1 - \$499 per week (Australian Bureau of Statistics 2016).

The history of frequent contact with outsiders in this area is less than a century old – the first mission in the area was set up in 1937 at Ernabella. Western financial concepts and practices are still infrequently experienced and poorly understood.

### **Broome And Region Overview**

Broome has a population of 16,222, 28.2% of whom identify as Aboriginal and/or Torres Strait Islander. The ABS found that of the 773 households where a non-English language is spoken, 279 spoke Bardi and 159 spoke Kriol (both indigenous languages native to the area). The median household weekly income reported by the ABS stands at \$992 (Australian Bureau of Statistics 2016)

The response of MMT and Broome Circle to the review of the Draft Code follows below

## 2. Consumer Sales, Service and Contracts (Chapter 4)

### **Industry Guidance Note, Sales Practices and Credit and Debt Management, Clause 1.**

*It is important customers are provided with the correct advice in relation to the features and benefits of the products and services they are considering for purchase. Industry is committed to ensuring consumer receive clear, accurate and relevant information when purchasing products and services from providers and not engaging in unacceptable and improper sales practices such as 'upselling' or 'cross selling' to potentially vulnerable customers.*

#### **1.1. Frontline sales practices and staff training**

- A. Identifying the appropriate solution for the customers' telecommunications, information and entertainment needs.
- B. Asking customers what is the best option for them. o Using a standard sales conversation framework to fully explore customers' needs and so match the appropriate solution to these needs.
- C. Deploying and using tools to provide sales consultants the capability to, for example, provide customers with a clear view of how their order will appear on their bill.
- D. Providing customers with clear, easy to understand product terms & conditions
- E. Not using pressure tactics or engaging in conduct which is unfair or unreasonable, particularly when dealing with consumers who have significantly less bargaining power.
- F. All CSP staff complete extensive training prior to commencement to ensure compliance with all code requirements.

Based on evidence compiled from multiple client cases, there is a need for the telecommunications industry to review and significantly improve their sales practices. Our collective client experience strongly suggests that frontline retail staff remain ignorant or dismissive of the ACCC, TIO and Code requirements to cater appropriately to the needs of consumers who are disadvantaged or vulnerable. For example, the "Loans and Phones" Project (a community-based educational programme run by MoneyMob Talkabout aimed at assisting Indigenous consumers to understand phone contracts) has uncovered multiple issues at the point of sale during its engagement with the remote communities of the APY Lands, far north-west South Australia. Further detail about specific issues is provided throughout this submission.

**a. Telecommunications Consumer Protection Code, Clause 4.1.2**

"A supplier must make available the following information without charge:

**(g) Mobile Coverage:** The network Coverage in Australia for the telecommunications service, which may include a map or a diagram of the mobile coverage."

APY Lands communities – with the exception of Ernabella - have only had mobile phone coverage for a period of time ranging between the last three to eight months. The only provider is Telstra.

Since January 2018, MoneyMob Talkabout has worked with twenty-eight people who had purchased an assortment of post-paid devices such as mobiles and tablets as well as additional accessories, including speakers. Collective debt to Telstra for this group of 28 is in excess of \$88,000 (with several unconfirmed amounts, meaning the total would be significantly higher) and most debts pre-date the introduction of mobile coverage in the area. Some debts go back as far as 2009.

It has been common for people to think their device had broken or stopped working upon arriving back into community; the device was disposed of and a replacement phone was purchased. During an educational session of the Loans and Phones Project one client, who chose to share her experience, said *'Those phones just stopped working, they broke. So I got a new one from the store and got a prepaid phone instead'*.

Telecommunications sales representatives should have a sound knowledge of the areas of coverage offered by their company. However, the data we have compiled clearly shows that Telstra have been selling plans to consumers who live in areas that cannot access the benefits they are paying for. This is a clear breach of the Telecommunications Protection Code.

- b.** *Telecommunications Consumer Protection Code, Clause 4.7 Consumers with Different Needs*  
"A Supplier must ensure its sales representatives are able to interact with disadvantaged or vulnerable consumers appropriately"

Telecommunications products contracts are very technical and can be confusing to consumers, particularly those who may have low literacy and numeracy and/or speak English as a second language. These are the characteristics generally shared by the clients of the agencies contributing to this submission.

The data compiled by our two agencies reveals clear patterns in the communications (or lack thereof) that take place between sales staff and Indigenous customers in telecommunication stores. In addition to the issues noted about coverage, a majority of clients seen by our organisations did not understand the concept of the following:

- Data allowances
- Data usage
- Excess charges
- Minimum cost
- Lock in contract

It seems that frontline retail staff are failing to effectively communicate to Indigenous consumers both the general use and function of the device and the terms and conditions of a mobile plan.

The ACCC Business Snapshot “Don’t Take Advantage of Disadvantage” places responsibility on retailers to take appropriate steps to ensure the customer understands what they are purchasing. The ACCC sets out very clear criteria for identifying vulnerable consumers. In the case of Indigenous clients, there should be numerous clear indications at the point of sale that they may be vulnerable when they present at a retail outlet. For example, the address on their ID may indicate remoteness. English language proficiency/confidence is likely to be apparent to staff in conversation. In addition, there is abundant publicly available evidence about the income disparity between the broader population and the Indigenous community. This should prompt a cautious approach from sales staff as to product affordability for Indigenous clients.

Despite this, clients of our agencies are regularly found to have the following shared experiences:

- Sale of multiple devices when on a social security benefit and not able to afford monthly contract fees
- Sale of devices which cannot be used in their home areas
- Sale of devices where it is clear that the client will not be the end user, and there is a greatly increased risk of the client incurring a debt on behalf of a third party
- Sale of add on services which are of little to no use to the client – e.g. international roaming, device upgrades/exchanges when the client would need to make round trips of more than a day to exchange goods

Retail staff and franchisees need to be trained in, and expected to adhere to, sales practices which cater to the needs of vulnerable consumers. Sales results alone should no longer be accepted by retailers as the only measure of accomplishment. End to end customer experience and satisfaction must be given much more weight in relation to an outlet or retailer’s overall commercial success.

**c.** *Telecommunications Consumer Protection Code, Clause. 4.4.3 Disadvantaged or Vulnerable Consumers*

“A Supplier must provide training to its Sales Representatives on how to interact with disadvantaged or vulnerable Consumers appropriately.”

Retailers often claim that they do not want to be seen to “discriminate” against particular groups of clients by not selling to them or applying inappropriate levels of scrutiny. We argue that this is a disingenuous claim, which obscures telecommunications retailer’s reluctance to take responsibility for achieving an appropriate balance between consumer choice and consumer protection.

**d.** *Telecommunications Consumer Protection Code Clause 4.9 Customer Service*

Our client experience indicates that customer service – particularly phone-based responses - to Indigenous consumers needs to be improved considerably. MoneyMob clients that have attempted to call Telstra report that they struggle for a number of reasons. The language barrier is frustrating for them and makes them feel unheard, self-conscious and frustrated. People tend to give up and not persist with their inquiry.

Of the clients MoneyMob Talkabout and Broome Circle have identified in our work so far, there was not one in the APY Lands or the West Kimberley who was aware Telstra had an indigenous hotline. When we did assist customers to call this line from community locations, the responses from Telstra staff were inappropriate and demonstrated a lack of awareness of day to day reality for Indigenous customers. For example, customers were told to just “go into the nearest Telstra store” (often 500 kilometres or more away), or to simply download the Telstra App onto their device (no coverage in the area to do so).

This service should in theory be much more amenable to Indigenous consumers than the standard hotline – this is generally the aim of specialist Indigenous call centres. However, as long as operators do not have the capacity to respond in a manner which is sensitive to the client base, and the Indigenous line itself is largely unknown, it is a fairly ineffectual response.

Telecommunications companies need to invest in developing staff who can communicate well with indigenous consumers, are culturally sensitive, understand the remote locations in which Indigenous consumers live and what this means in regards to customer service responses needed and offered.

### **Case Study 1**

MoneyMob client ‘Linda Smith’ is a 54-year-old female who works part time and receives a parenting payment, providing her with a weekly income of approximately \$550. Linda went into a Telstra store with the specific aim to purchase a tablet. However, after encountering a Telstra sales person Linda left the store with three post-paid plans (two mobiles and one tablet) including multiple add ons. The events that took place during that sales interaction changed Linda’s intentions and led her to agree to sign a contract for three post-paid devices. However, in discussions with Linda about the interaction with sales staff it’s clear that she did not understand what was happening at the time and did not feel comfortable saying no in the store. Linda’s account of the conversations that took place between her and the salesman suggest that she was advised it would be better for her to pay a little bit each month and receive extra benefits, like games & data, than to pay upfront for a prepaid device. Linda recounts she was aware she was agreeing to sign onto two post-paid plans, but had no idea that her daughter had handed over her ID to the same salesman and requested a third device be added to her Mother’s name. Linda left the store believing that her daughter’s new phone was not her responsibility, that the games and internet on the devices were free and that she would only be paying the monthly repayments of the selected plan. Linda soon received a bill totalling over \$3,000 in excess data charges for the three devices, on top of her monthly repayments.

#### **e. Recommendations**

- i. That telecommunications industry staff and agents/franchisees– particularly those in frontline sales or customer support roles – should have to undergo cultural awareness/ competence training and training in effective

communication with non-English language speakers. This should preferably be specific to the geographic area in which they work.

- ii. That clause 4.7.2 of the TCP Code regarding disadvantaged and vulnerable consumers provide a more detailed and clear articulation of what constitutes “appropriate interaction” with disadvantaged and vulnerable consumers. The current clause is vague and does not provide useful guidance on what specific behaviours or outcomes would constitute “appropriate” interaction by sales staff.
- iii. That customer documentation be adapted to include scope for the retailer to include notes about the specific needs and preferences of the consumer, which would clearly indicate that an appropriate conversation has been had with each individual. For example, “discussed with Ms X that device upgrade may not be appropriate due to where she lives.” Copies of documentation should be given to the consumer and retained by the retailer.
- iv. Sales staff should undergo extensive training on unconscionable conduct and how to prevent taking advantage of a vulnerable consumer.
- v. Telecommunications staff, both sales and customer service, should be required to keep records of interactions and conversations between themselves and the consumer at the initial point of sale and thereafter.

### **3. Billing (Chapter 5)**

Due to a number of factors, including low literacy and numeracy, non-English speaking background and remote locations billing has also been a contributing factor to Indigenous consumer debts.

Some Indigenous consumers who live in extremely remote locations are unable to access Internet billing, information on products and services and/or customer service avenues due to poor or no coverage. The mail system for these remote communities can also be unreliable and is not a failsafe substitute in the absence of internet billing. Mail to remote communities is often delivered to centralized community offices which are staffed intermittently and often not open. Mail is frequently sent to the wrong community by Australia post. Delivery timeframes are usually at least two weeks from a major capital city. Mail deliveries can be cancelled at short notice if the plane is overloaded or weather is poor, further delaying delivery times by a week or more. Therefore, people are not always or promptly receiving bills and communications, which may affect people’s ability to pay their bills on time and/or receive important information from Telstra.

The layout and technical language used in a post-paid bill does not cater to those of a non-English speaking background. The technical language, such as ‘*unmetered*’ and ‘*shared data allowance*’ as well as statements like ‘*Includes a charge from the start of your new plan/bundle to the end of this billing period, plus a charge in advance for the next billing period*’ (in addition to the small font size)

are hard for customers to decipher and understand. Clients will often bring a bill to our staff and ask to have it read to them, as they do not understand what it means or what they are required to do. This is especially so in regards to post-paid plans where they are receiving a bill that exceeds the monthly repayments they initially thought they signed up for.

It has also been a common occurrence for clients to be perplexed with bills due to the fact they signed up for direct debit payments. They do not understand why they are receiving a bill and being charged for excess usage of data and/or calls and SMS.

In addition to this, Telstra fails to include the indigenous hotline contact number on bills, meaning this is not known to Indigenous consumers who may have questions, need assistance or wish to make a complaint.

**a. Recommendations**

- a. That where a telco has an Indigenous hotline, this number be promoted and included prominently on all communications, especially bills.
- b. That all billing options be explained and presented to customers at the point of sale.
- c. That bills utilise a more user-friendly layout, including larger font size and infographics that explain the breakdown of charges.
- d. That telcos reduce the amount of technical language used and replace this with clear, direct explanations
- e. That telecommunications staff should be able to look at a customer's location and be able to advise the best mode of billing for them and their living circumstances.

**4. Credit and Debt Management (Chapter 6)**

- a. *Telecommunications Consumer Protection Code, Clause. 6.2 Responsible Provision of Telecommunications Products*

*"Suppliers must undertake a Credit Assessment before providing a Post-Paid Service to a Consumer, and explain the financial implications of the provision of that Post-Paid Service to a Customer or their Guarantor*

A credit assessment is a not sufficient means of determining risk in relation to responsible provision of telecommunications products. A credit assessment provides only a limited amount of information, and does not provide a true picture of a customer's living expenses and other financial commitments. Particularly in the case of Indigenous clients, they have a range of financial obligations that differ to the general population. There are cultural obligations to financially support family members, including extended family. Those living in regional and remote areas incur far higher living costs than the broader population. Standard assumptions about affordability may be far from accurate in these circumstances. Considering post-paid plans are a long-term commitment (often a minimum of two years) and there is significant scope to incur large excess charges, a thorough affordability check should be required at the point of sale.

Principles for assessing affordability have long been in place in other industries; for example, credit providers are already subject to a well-established national regime of consumer protections, where it is accepted that affordability checks, product suitability and the ability to contract in an informed manner are standard business practice. This does not discriminate against the consumer; rather it recognizes there is no benefit to a consumer in a contract which does not suit their needs or purposes – or indeed in one which causes them detriment.

The evidence we have compiled in relation to remote Indigenous consumers clearly shows that they are routinely being sold post-paid services that they cannot afford, and do not understand the financial implications thereof. This results in significant stress and additional financial hardship for an already disadvantaged group.

### **Case Study 2**

MoneyMob client 'Jane' is a 47-year-old female, living in a home shared with multiple relatives, two of whom have chronic illnesses. Jane herself is also chronically ill and her sole form of income is Newstart Allowance. Jane was signed up for three mobile device post-paid plans starting from \$79 each per month plus additional add ons, such as 'Accessory repayment option' and 'Stay connected plus', which brought each plan to between \$130 - \$175 per month. She was pressured into purchasing the devices by third parties, because she was the only person who had current photo ID. This means, Jane left the store having signed up to pay \$500 per month in repayments, not including any extra charges she may incur through the use of data and/or calls & SMS. Jane's Newstart Allowance provides her with approximately \$500 income per fortnight. Within one month, Janet received a bill totalling \$747.13 (almost her entire monthly income) for the three devices and excess data charges. During this sale, Telstra's sales practices would have uncovered the following:

- Jane's remote residence through the inspection of her ID
- Her low income through her employment/income information required by Telstra
- Her limited English through conversations
- Her indigenous background
- The lack of coverage in her area, again, through her listed residence on her ID

However, despite the above indicators pointing to the fact that Jane is a person who may be considered a vulnerable consumer, Telstra staff continued to proceed with standard sales practices which were not suitable to the customer's circumstances, and because of this, she now has a significant debt.

### **Case Study 3**

Ms LB is a single mother and victim of domestic violence whose only income is Centrelink payments. She was referred to Broome Circle for help by her case worker from the Department of Child Protection. Ms LB went to the Broome Telstra store (9/11/17) asking for one phone. The salespeople told her she could get a free tablet (which was enticing as she has small kids), but she would need to get a two-year plan contract and a second phone. Ms LB ended up signed to a \$300 per month Telstra plan.

Ms LB's case worker later accompanied Ms LB back to the store and tried, unsuccessfully, to end the contract. During these negotiations the case worker, discovered that Telstra used an eight-year-old credit check to approve the contract. Ms LB speaks Creole at home and is not proficient in English. On 5/2/18 the case worker made a priority application with Telstra (because of Domestic Violence) to get a land line connected at home for Ms LB. She rang Telstra and was told that this would not be possible until Ms LB cleared the debt from the mobile phone contract, which then stood at \$2,443.

#### **Case Study 4**

Ms EH is a single mother and lives in a remote Aboriginal community 200 km north of Broome along a dirt road that is closed for long periods of the wet season. She lives on a Supporting Parent Payment with four dependent children (aged 6 to 17). Her income is less than \$20,000 per year. She visited the Broome Telstra store to get a new phone in April 2017. Instead of receiving a simple phone for prepaid calls and data, she was signed up to a two-year contract for multiple devices totalling repayments of \$240/month. This amounts to finance of \$5,760 over the life of the contract. Her latest bill totalled \$7,874, and Telstra refused to negotiate.

#### **b. Recommendations**

- i. Telcos should be required to undertake mandatory affordability and suitability assessments for the sale of devices on a contract.
- ii. Telcos should be bound by Responsible Lending Obligations similar to those contained in the National Credit Code, and should have to review and amend their internal policies accordingly.

### **5. Findings and Conclusions**

MoneyMob have been communicating with a number of organisations throughout Australia regarding the sale of post-paid plans to Indigenous consumers. An inter-agency database has been established, which aims to collect and collate data which compiles the amount of debt, the standard of the sale and the living circumstances of the consumer.

Currently, four Agencies have contributed to the database, representing 69 Indigenous clients and \$332,494.67 in debt. Data collected to date is included below in Appendix 1 at Table 1.

MoneyMob Talkabout alone has uncovered over \$88,000 of Telstra debts in the last seven months. This debt represents 20 low-income clients, while another 8 are still waiting to find out how much they owe. A majority of these consumers purchased these plans at a time when there was no coverage in the area. Furthermore, all clients live in a remote area, are of Indigenous background, are of a low income, non-English speaking background and/or have low literacy and numeracy.

Broome Circle report 23 clients from the local Broome area who owed over \$93,000 in debt. All but one client is Indigenous and mostly have limited English skills, low technical literacy, extremely low incomes, and often very unstable living circumstances. They do not understand the complexities of excess data charges.

In consultation with many clients regarding these debts there was very little information they could provide about their selected plan and device. A lot of people were unable to describe the type of plan they signed up for, the initial cost of the plan, how they were supposed to be paying for the service or how much they currently owed.

MoneyMob Talkabout's exchange of information and data with other agencies reflects that the issues financial counselling organisations are seeing are systemic and widespread. Broome Circle and MoneyMob Talkabout see this as evidence that the current Code Protections are being systematically ignored and are not effective protections for vulnerable Indigenous consumers.

#### **Contacts:**

**Carolyn Cartwright**

Managing Director

MoneyMob Talkabout

T: 08 8953 2410 | F: 08 8952 7092

16-17 / 63 Todd Mall

Alice Springs, NT 0871

[manager@moneymob.org.au](mailto:manager@moneymob.org.au)

<https://moneymob.org.au/>

**Brendan Renkin**

Chairperson

Broome Circle

T: 08 9193 6425 | F: 08 9193 6678

27 Frederick St (Cnr Weld)

Broome, Western Australia 6725

[brendan@broomecircle.org.au](mailto:brendan@broomecircle.org.au)

<https://www.broomecircle.org.au/>

**Appendix One Interagency Debt Database  
Table 1.**

<b>Client Code</b>	<b>Location</b>	<b>Organisation</b>	<b>Living Circumstances</b>	<b>Point of Sale Location</b>	<b>Debt Amount</b>	<b>Notes</b>
BRAN80-PUK	Pukatja, APY Lands	MoneyMob	Newstart: \$500 p/fortnight.	TBC	\$1,720.00	
DUEL73-PUK	Pukatja, APY Lands	MoneyMob	Newstart/Family Tax Benefit: \$1,100 p/fortnight	Alice Springs	\$7,608.91	Client asked to lend her ID to two other people so they could purchase phones as they had none.
WILI62-AMA	Amata, APY Lands	MoneyMob	Newstart: \$550 p/fortnight.	TBC	\$263.00	
KUMU64-AMA	Amata, APY Lands	MoneyMob	Parenting Payment: \$500 p/fortnight.	Arndale Shopping Centre, Adelaide	\$5,984.52	
HUMA68-AMA	Amata, APY Lands	MoneyMob	Newstart/Family Tax Benefit: \$1,400 p/fortnight	Yeperenye Shopping Centre, Alice Springs	\$0.00	Client went into the store to buy an iPad and left with an iPad and two iPhone plans.
DIRE75-AMA	Amata, APY Lands	MoneyMob	TBC	TBC	\$0.00	

PABR78-IND	Indulkana, APY Lands	MoneyMob	Parenting Payment: \$1,000 p/fortnight	Alice Springs	\$1,484	This is a WI-FI Plan and was purchased approximately two years ago.
WAJU82-IND	Indulkana, APY Lands	MoneyMob	TBC	Port Augusta	\$380.00	
YAER92-IND	Indulkana, APY Lands	MoneyMob	TBC	Adelaide	\$12,000.00	
CUVA71-IND	Indulkana, APY Lands	MoneyMob	Carer Allowance/Parenting Payment/Wages: \$1,960	Adelaide	\$9,000.00	This plan was purchased in approximately 2009. The debt has been paid.
CUVA71-IND	Indulkana, APY Lands	MoneyMob	Carer Allowance/Parenting Payment/Wages: \$1,960	Adelaide	\$3,000.00	This Plan was purchased in approximately 2010. The debt has been paid.
MUMA71-IND	Indulkana, APY Lands	MoneyMob	Wages: \$1,200 p/fortnight	Adelaide	\$5,000	Client thinks she may have signed onto two plans, but is unsure.
DECH71-IND	Indulkana, APY Lands	MoneyMob	Wages: \$1,600 p/fortnight	TBC	\$0.00	This client thinks she may have two plans and is unsure how much she owes and cannot remember where the purchases were made.

DOMA71-KAL	Kalka, APY Lands	MoneyMob	Newstart \$550 p/fortnight	Westlakes Shopping Centre, Adelaide	\$8,961.81	Client says she went to the store with two other people, didn't want phone for herself as she already had a home line. The other two people pressured her to provide her license so they could get phones. No coverage in her home community. Three devices taken by other people, not for client's use.
GOTU52-MIM	Mimili, APY Lands	MoneyMob	Disability Support Pension; Energy Supplement; Remote Area Allowance: \$700 p/fortnight.	Port Pirie	\$707.50	The sales person listed client's address as '1 Gap Road, Alice Springs' which is a commercial address and different to the address listed on her ID. Client said the salesman did this. Telstra has flagged this as a fraudulent sale and noted an investigation needs to occur. This debt has stopped client from being able to receive the free 'In-Contact' service provided by Telstra, which she needs to be able to call emergency services.
DOLO62-MIM	Mimili, APY Lands	MoneyMob	Newstart: \$700 p/fortnight	TBC	TBC	
WACY81-MIM	Mimili, APY Lands	MoneyMob	Paid Parental Leave Scheme/Wages: \$1,500	Alice Springs	\$14,000	4 x mobile phones and a tablet in October 2017

LOKA72-MIM	Mimili, APY Lands	MoneyMob	Parenting Payment: \$500 p/fortnight.	Adelaide	\$709.76	
GOMA79-MIM	Mimili, APY Lands	MoneyMob	Carer Payment: \$700 p/fortnight	TBC	TBC	2x mobile plans but could did not know how much they were or how much she owed.
BADA81-FRE	Fregon, APY Lands	MoneyMob	Disability Support Pension	Whyalla	\$7,000.00	Approximate estimate by client, debt amount to be confirmed.
SMPO57-FRE	Fregon, APY Lands	MoneyMob	TBC	Adelaide	\$6,760.00	Went into the store to <b>buy</b> a phone and came out with two plans.
CUEV82-FRE	Fregon, APY Lands	MoneyMob	Family Tax Benefit; Parenting Payment: \$480 p/fortnight	Whyalla	\$3,000.00	
STCA78-FRE	Fregon, APY Lands	MoneyMob	Newstart/Parenting payment: \$540 p/fortnight	TBC	\$3,641.00	Client could not remember/articulate when or where the phone was purchased or whether it was more than one device.
ROGL79-FRE	Fregon, APY Lands	MoneyMob	Centrelink: \$590 p/fortnight	Alice Springs	\$3,640.55	Went to buy a phone and signed onto 2 x mobile plans.
PESU98-PIP	Pipalyatjara, APY Lands	MoneyMob	TBC	Alice Springs	\$8,000.00	
YOCA72-PIP	Pipalyatjara, APY Lands	MoneyMob	Carer Allowance; Carer Payment; Energy Supplement: \$1,000 p/fortnight	Arndale Shopping Centre, Adelaide	\$8,000.00	

LODA92-KAL	Pipalyatjara, APY Lands	MoneyMob	TBC	Adelaide	\$11,000	This debt needs to be confirmed. There was a language barrier and I suspect that this debt may be in her Mother's name, but I do believe she also has a mobile debt. Will follow up with Telstra and clarify.
BUEM64-PIP	Pipalyatjara, APY Lands	MoneyMob	Disability Support Pension: \$900 p/fortnight	Arndale Shopping Centre, Adelaide	\$6,000.00	
RATA96-HER	Hermannsburg	LCC	Carers Pension, Carer Allowance: \$1053.50	Yeperenye Shopping Centre, Alice Springs	\$4,123.20	TBA
SENE68-BRO	Broome	Broome Circle	\$281/week income. Caring for elderly father. Large Child support debt	Broome Telstra franchise store	\$1,389	Visited Telstra shop for repair to pre-paid handset. Instead, signed to expensive contract with multiple new devices
HUEV69-OA	One Arm Point	Broome Circle	Single mother, 4 children	Broome Telstra franchise store	\$7,874	1. Signed to expensive contract with multiple new devices. No affordability assessment before signing.
THKA61-BID	Bidyadanga	Broome Circle	Single mother on Centrelink payments	Broome Telstra franchise store	\$8,737	1. Signed to expensive contract with multiple new devices. 2. No budget or affordability assessment before signing customer

BULI96-OAP	Broome	Broome Circle	Single mother, Domestic Violence Victim	Broome Telstra franchise store	\$2,443	1. Signed to expensive contract with multiple new devices. 2. Pressure sales tactics reported by client with v low income. 3. Telstra won't connect landline at new 'safe house': mobile debt
STCL91-OAP	One Arm Pt	Broome Circle	\$242/week income. Homeless. Disability Pension.	Broome Telstra franchise store	\$1,572	1. Signed to expensive contract with multiple new devices. 2. Pressure sales tactics reported by client with v low income
WIMO76-BRO	Broome	Broome Circle	\$291/week, Single mother, dependent children	Broome Telstra franchise store	\$5,134	1. Signed to expensive contract with multiple new devices. 2. Pressure sales tactics reported by client with v low income
LATA90-BRO	Broome	Broome Circle	Single mother, 1 child, 1 premature new born	Broome Telstra franchise store	\$4,119	Signed to expensive contract with multiple new devices. 2. Pressure sales tactics reported by client with v low income
HUNE51-OAP	One Arm Pt	Broome Circle	Aged Pension, lives remote Aborig. Commun	Broome Telstra franchise store	\$1,895	Signed to expensive contract with multiple new devices. 2. Pressure sales tactics reported by client with v low income
BIRU97-BRO	Broome	Broome Circle	Domestic Violence, 20 yo, massive family trauma	Broome Telstra franchise store	\$8,430	Signed up to contract with 2 x smartphones, speakers, ipad. 2. Joint expense with violent ex-partner, but he won't pay half. 3. Debt collector for Telstra was harassing client.

WADA71-BRO	Broome	Broome Circle	On Sickness Benefits (Not Aboriginal)	Broome Telstra franchise store	\$1,307	Excess data while in a coma in hosp and phone locked in cupboard. 2.Telstra renewed contract without signature or permission
KERE72	Broome	Broome Circle	Lives on a Disability Pension, \$337 per week	Broome Telstra franchise store	\$8,023	Sold contracts for three new phone devices @ \$225/month
ROWI70-BRO	Broome	Broome Circle	Itinerant station hand, wife and 1 child	Broome Telstra franchise store	\$2,469	Went to Store asking for home WIFI, sold expensive package deal. 2. Pressure sales tactics reported by client with v low income
COJE70-BRO	Broome	Broome Circle	Married to itinerant station hand, 1 child	Broome Telstra franchise store	\$1,953	Cold-called by Telstra and sold bundle inappropriate to budget. 2. Pressure sales tactics reported by client with v low income
BERO55-BRO	Broome	Broome Circle	On sickness benefits, bankrupt. (Not Aborig)	Broome Telstra franchise store	\$1,000	Received overdue bill in Jan18 \$350/mth 2 x contracts from July17. 2. Never visited the store nor signed any Telstra contracts. Store used his name and billed him despite no ID or signature
WIGL69-BRO	Broome	Broome Circle	1st language is Martu. On a carer's pension	Broome Telstra franchise store	\$2,391	Carer for wheelchair-bound partner.

SWNA78-BRO	Broome	Broome Circle	Retrenched from job, on Centrelink \$282/week	Broome Telstra franchise store	\$8,741	Signed to contract for three new devices, speakers, tablet.2. Told that all data use was INCLUDED in contracts.
JALO67-BID	Bidyadanga	Broome Circle	Low income, on Newstart	Broome Telstra franchise store	\$7,664	Sold package of three smartphones
CORO60-BRO	Broome	Broome Circle	Single, living on Disability Support Pension	Broome Telstra franchise store	\$3,853	Smartphone, speakers, iPad package
SAJO68-BRO	Broome	Broome Circle	Lives on Disability Support Pension	Broome Telstra franchise store	\$1,487	1. 2 x Smartphones, speakers, iPad package.2. Never shown how to use iPad - cannot use it.
ISYV70-BRO	Broome	Broome Circle	Single mum, earns \$475/fortnight	Broome Telstra franchise store	\$5,149	1. Excess data charging never explained to customer.
HURA72-BRO	Broome	Broome Circle	Disability pensioner(mental), barely speak English	Broome Telstra franchise store	\$4,607	Sold bundle package. Severe mental health problems. Barely speaks.
YAYA56-BID	Bidyadanga	Broome Circle	Age pensioner, parenting two grandchildren	Broome Telstra franchise store	\$4,000	Sold bundle package with no understanding or need for iPad.
CAJU50-BRO	Broome	Broome Circle	Age pensioner	Broome Telstra franchise store	\$873	Cannot get broken phone fixed without new 2yr contract

KETH60-ALI	Alice Springs	Anglicare-NT	DSP & supplements \$970 p fn	Alice Springs	\$3,000.00	Mobile - high data usage; vocal client, outraged sense of fair play. Included client email letter (as requested) with dispute letter. [Client had been sold further services while in arrears. These were subject of another complaint and settlement, with \$200 waived, no contract cancellation fee, and client choosing to buy handset for \$1000.]
DRSY77-ALI	Alice Springs	Anglicare-NT	Newstart & supplements \$622 p fn	Alice Springs	\$9,092.00	2 mobiles and contracts; high data; direct debits never honoured - insufficient in account; service cancelled after 4-5 months
MACE77-ALI	Alice Springs	Anglicare-NT	DSP & supplements \$926 p fn	Alice Springs	\$3,182.00	docs, including medical, requested; budget provided - but Telstra comments about 'ability to pay' showed did not look at it. First mobile contract always in arrears; Telstra added 2nd concurrent contract when client account "not in arrears" but this was due to temporary clearance - with \$500 voucher. Went through several levels at Telstra to get final outcome
KARH95-ALI	Alice Springs	Anglicare-NT	PPP & FTB & supplements \$900 p fn	Alice Springs	\$2,670.00	Took a month to work through.

PRGR69-ALI	Alice Springs	Anglicare NT	DSP Single no dependants. Still involved with Percy Court	Alice Springs	\$5,847.95	Changed provider. Had 2 devices
CAGE82-ALI	Alice Springs	Anglicare NT	PPS & FTB 3 dependants. Was with Percy Court	Alice Springs	\$1,907.39	Fought and got a \$4000 reduction of data charges. Final bill \$1907.39. 2 devices
ANPU52-DAR	DARWIN	HK Training & Consultancy	Disability Pension	Casuarina store	\$5,260	Client was signed up to multiple phones on a Disability pension
MAKO68-DAR	DARWIN	HK Training & Consultancy	Disability Pension	Casuarina store	\$6,800	Client was provided with 4 phones in a matter of 4 weeks
JUWA55-DAR	DARWIN	HK Training & Consultancy	Disability Pension	Katherine shop	\$2,936	Client was sent a Telstra debt with a Katherine address, similar name. This was resolved after a few months case of fraudulent
JOAS63-DAR	DARWIN	HK Training & Consultancy	Disability Pension	Casuarina store	\$6,870.00	No technological knowledge to understand the phone contract or operate the smart phones.
CHBI60-DAR	DARWIN	HK Training & Consultancy	Disability Pension	Casuarina store	\$5,000.00	Very low literacy and numeracy, not able to sign name
HEPU56-DAR	DARWIN	HK Training & Consultancy	Disability Pension	Casuarina store	\$4,884.00	The client has low literacy and numeracy, not able to comprehend the complexity of a contract or how to operate a smartphone.

KEMA62-GUN	GUNBALANYA	HK Training & Consultancy	Newstart	Casuarina Store	\$14,700	Client who is on Centrelink and with a medical condition was signed up to a contract he did not understand or could possibly afford.
URBA87-GUN	GUNBALANYA	HK Training & Consultancy	Working low income	Casuarina Store	\$9,000	Client is on a very minimum wage provided with a contract that she did not fully understand
MAKO68-DAR	DARWIN	HK Training & Consultancy	Disability Pension	Casuarina Store	\$6,900	Client was signed up to two separate contracts equalling to 4 phones in a space of a month.
ISNA69-GUN	GUNBALANYA	HK Training & Consultancy	Disability Pension	Palmerston	\$10,000	Client was signed up to a contract which he did not understand or could afford, low literacy and numeracy.
HETI69-DAR	DARWIN	HK Training & Consultancy	Disability Pension	Casuarina Store	\$6,644.33	Client went into the Telstra Shop to get her own phone fixed, walked out 5 hours later with 3 smartphones including a bill for fixing her phone.
<b>TOTAL</b>					<b>\$332,494.67</b>	