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COMMUNICATIONS ALLIANCE/AMTA RESPONSE TO
THE DECEMBER 2012 ACMA CONSULTATION PAPER:

“Proposed variation to numbering plan – charges
for calls to freephone and local rate numbers”

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INTRODUCTION

Communications Alliance and AMTA are pleased to have the opportunity to provide this submission in response to the December 2012 ACMA discussion paper on the "Proposed Variation to Numbering Plan – charges for calls to freephone and local rate numbers" (**Discussion Paper**).

This submission should ideally be read in conjunction with the Associations' submission to the ACMA on these topics, lodged in November 2012.

http://www.acma.gov.au/WEB/STANDARD/pc=PC_600137

The market-based proposal detailed herein has been developed with the direct involvement of the three major Mobile Service Providers (Telstra, Optus and VHA) and other service providers, including AAPT, for the ACMA's consideration.

The industry proposal will:

- See a more rapid implementation of free-of-charge calls from mobile handsets to 1800 numbers; and
- Leverage marketplace developments and industry initiatives to provide a framework where no consumer need incur high costs for calling 13/1300 number from mobile phones.

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>.

About 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>.

OVERVIEW

Communications Alliance welcomes the ACMA's commitment to consider a range of solutions to achieve its objectives relating to charges for calls to freephone and local rate numbers.

Industry acknowledges that this issue is one that has consequences for a wide range of stakeholders including consumers, carriage service providers, the organisations that advertise and use these numbers and the FLRN Operators that provide these services to FLRN subscribers. Industry also supports the intent underpinning the ACMA's review, on the basis that it considers achievement of the following objectives is in the interests of all the aforementioned stakeholders:

- ensuring the Numbering Plan reflects changing consumer use of telecommunications services;
- ensuring that numbering arrangements reflect the legislative intent, including the object of the *Telecommunications Act 1997 (Telco Act)*; and
- improving price transparency.

The industry proposal has been developed from a strong point of view that regulatory intervention to achieve these objectives should only be considered where market based solutions have failed to deliver them or where there is clear evidence of systemic forms of consumer detriment arising from the relevant existing market mechanisms. This is particularly important in the context of mobile services given that their ever-growing importance at both a consumer and industry level means any regulatory intervention in this market sector needs to be carefully thought through. Further, in the case of mobile pricing, we believe great care needs to be taken to ensure such intervention does not result in unintended consequences for consumers or significantly impact the industry's legitimate commercial interests.

The ACMA's review has placed a strong focus on comparing relevant mobile pricing elements with related fixed line pricing elements. Industry considers that there are significant underlying challenges and potential pitfalls associated with this approach, due to the fundamentally different evolution paths applying to these types of services. As outlined in previous submissions, the differences in technology, cost structures and service characteristics applying between fixed and mobile are significant. In turn these differences have also substantially framed the service innovations industry has developed and rolled-out to meet consumer expectations on a number of fronts - including as to choice, price transparency and the availability of plan structures that reflect and accommodate increased usage patterns.

Importantly, these innovations align very closely with the objectives underpinning the ACMA's review and the proposals now being considered. This paper explains that alignment in detail, in particular as it relates to the availability and take-up of included value plans – which provide great benefits in terms of the types of consumer expectations referenced above.

Nonetheless, industry recognises that there is merit in exploring opportunities to enhance transparency and affordability of telecommunications services to the extent these enhancements can be achieved without undue detrimental consequences or undermining market mechanisms that deliver benefits for consumers in the industry. In that context this submission responds to the ACMA Consultation Paper cited above and is designed to:

- outline the merits of the Industry Option B proposal (compared to the regulatory Option A mode) and why Option B is the better model in giving effect to the ACMA Numbering plan and other legislative objectives;
- Answer the specific questions posed by the ACMA about the industry's market-based proposal; and
- Provide a more detailed description of how the market-based proposal would be implemented should it be accepted by the ACMA as the preferred path to ensuring that the charging regime for calls to 1800, 13 and 1300 numbers is appropriate and transparent for consumers.

Industry remains firmly of the view that the market-based proposal will produce a far better outcome for consumers – and is deliverable sooner - than is the case for ACMA's 'Option A'. Option B would also avoid much of the disruption inherent in the regulator's alternative proposal. The market led solution will be more sustainable and have fewer unintended consequences. 13 and 1300 pricing is substantially more complex to implement for mobile in the way suggested in Option A and it would have the unintended consequence of a significant proportion of mobile consumers paying more for their calls.

It is relevant to note that there are numerous detailed elements within the market-based proposal, including the requirement for commercial negotiations on several levels, awareness-raising and research projects, IT change projects and other activities.

Resolving the attendant issues and completing the consultation, coordination and planning necessary to execute this proposal will require a body of intense work.

Industry proposes, therefore, that should the ACMA decide to adopt the industry proposal, Communications Alliance and AMTA will coordinate a concerted effort by industry and other relevant stakeholders to create the detailed work program and project plans necessary to make the proposal a reality. This program will include:

- the schedule for commercial interconnect negotiations between service providers – completion of which is a prerequisite to any change to current arrangements; and
- a timetable to advise B-party number owners of the new arrangements.

We project that this preparatory work can be completed in the space of 8 weeks immediately following an ACMA decision, and can be the subject of joint review with the ACMA.

The objectives of the market-based proposal are that every mobile consumer:

- Is well informed about the inclusions, exclusions and other features of their plan, including the charging relating to calls made to 1800, 13 and 1300 numbers;
- can access such a competitively offered plan if that is their preference; and
- can therefore manage their expenditure on such calls and avoid any undue detriment as a result of making such calls.

It must also be noted that the objective of the market-based proposal, as it relates to 13 and 1300 services, is not to ensure that every mobile consumer is using a '13-friendly' mobile plan. Seeking to ensure such an outcome would act to lessen competition, stifle service innovation and would not serve the interests of consumers whose particular circumstances mean that they do not want such a plan feature.

1 Co-Regulatory Steps

If the ACMA agrees to adopt the 'Option B' market-based proposal, Communications Alliance will capture the detailed requirements in an industry Guideline that will provide unambiguous guidance to all relevant service providers on the nature and timing of all elements of the proposal and the actions required by service providers to implement the proposal. This action should provide some reassurance to the ACMA, which raised a concern in its Consultation Paper around the market-based proposal not being an 'industry-wide' solution. Although industry Guidelines are not binding, industry participants have significant incentives to conform to them – and in the present context those incentives would be further strengthened by the industry commitment (documented below) to work with the ACMA in a subsequent further review of relevant FLRN arrangements and industry's recognition that regulatory intervention would be likely if the proposal was inadequately implemented.

In the circumstances industry believes it would be appropriate for the ACMA to agree to hold off on any formal regulatory action on 13/1300 services while the proposal is being implemented. The ACMA could undertake to schedule a review of the impact and success of the changes, to commence one year after the implementation date of the changes to 1800 charging, before deciding whether any further regulatory action was warranted.

2 More Rapid Implementation of Making All 1800 Calls Free of Charge to the Calling Party

To bring about this Numbering Plan changes there needs to be a process to finalise the new interconnect and B-party charging arrangements. If the ACMA agrees to move forward in accordance with Option B, service providers will move to quickly set a start date for the commencement of the necessary commercial interconnect negotiations. The timetable for such negotiations and related work would be targeted at achieving implementation of the 1800 changes during 2014. The industry objective if possible is to give effect to the changes within 12 months of the ACMA decision.

Service providers involved in the interconnect negotiations will keep the ACMA informed of progress in the negotiations and those reports will link to any commitments made regarding the timetable for implementation of the proposal.

The service provider commitment to rapid implementation is important, given that the 1 January 2015 implementation timeframe first proposed by the ACMA in its paper "Response to submissions on freephone and local rate numbers" in June 2012, and then in its expanded 'Option A' proposal outlined in the Consultation Paper of December 2012, already appear to be compromised by:

- the passage of time and the length of the ACMA consultative and decision-making process; and
- the fact that until an ACMA decision is made, service providers cannot start the process of having internal business plans approved and seeking to have capital expenditure allocated to make necessary system changes.

In making changes to 1800 charging arrangements, service providers will also need to take account of any potential impacts on the operating costs and viability of organisations that use 1800 services, and how these might affect the services they are able to offer. In this regard it is also worth noting there will be other factors that may impact existing arrangements, including increased call volumes.

3 B-Party charging arrangements

To bring about the new retail arrangements, industry would commit as part of its detailed work program to a timetable to advise B-party number owners of the new arrangements.

4 Service Providers Commit to Continue to Offer 13-Friendly Plans and Facilitate Customer Transition (Relates to ACMA Question13)

As discussed in previous submissions there is a significant risk that requiring the mobile industry to move to emulate the fixed line approach to 13 and 1300 call charging will lead to general consumer detriment. This is because mobile phone plans generally have an included value component so when 13 and 1300 number are an inclusion in the plan (as they usually are) consumers are not billed for the call.

The three major service providers (i.e. Optus, Telstra and Vodafone) have committed to continue to offer 13-friendly plans in both pre-paid and post-paid formats and invite the ACMA to review the situation 12 months after the implementation of the 1800 charging changes.

The three major service providers further undertake to examine whether once the market-based proposal is implemented, they could offer a limited 'transfer window' to post-paid customers who were subscribed to any 13-unfriendly plans, during which time they would be permitted to move, without incurring an early termination charge, to a broadly analogous 13-friendly plan offered by the same carrier/provider. It is noted that a broadly analogous plan would need to be determined by reference to a range of factors, including cost recovery principles (e.g. it would be important to ensure that carriers/providers were not deprived of a charging mechanism that would enable recovery of the cost of any hardware, such as a new mobile phone, that was provided to the customer under the original plan – when the cost would normally be recovered via that plan's monthly charges).

As part of the detailed work program, industry will consider the logistics and publicity arrangements for such a transfer window, including whether it could be scheduled to occur coincidentally across the industry.

A search conducted during February 2013 of the **Whistle-Out** website – a popular site for comparing mobile plans - shows that 13-friendly plans continue to proliferate and are now the dominant form of new mobile plans. This is in stark contrast to the situation in 2010, when the ACMA began examining this issue – a time when there were only a handful of such plans in the marketplace.

The site indicated that 12 of the 13 consumer mobile service providers from which it collects data offer post-paid mobile plans that include calls to 1800/13/1300 numbers within the included value allowance of the plan. (This appears to be an understatement, as the one service provider not listed as offering 13-friendly plans does in fact offer them – i.e. 100% of the service providers tracked by the web-site do offer 13-friendly plans). The search also indicated that 85 of the 126 plans (i.e. 67.5%) compared by the site search engine are 13-friendly (again an understatement for the same reason outlined above).

It should be noted that it is not only 'high-end' post-paid plans that offer the inclusion of 13/1300 numbers within the included value allowance. There are numerous sub-\$20/month plans that offer this feature, and several sub-\$10/month plans do also.

A plethora of pre-paid 13-friendly plans are also available in the market – including plans offering unlimited mobile access to 13/1300 numbers for as little as \$1 per day. While not a comprehensive market survey, this data strongly suggest ample availability of plans that enable consumers to manage their spend on mobile calls to 13/1300 numbers – and this situation will only be enhanced by steps such as the offer of a ‘transfer window’ as proposed above.

5 Mobile Carriers to Work with MVNOs to facilitate provision by them of FoC Calls to 1800 Numbers (Relates to ACMA Question 13)

Mobile carriers will ensure that their MVNOs and wholesale mobile reseller service providers are aware of the new Numbering Plan requirements regarding mobile calls to 1800 numbers being free of charge to the calling party.

For the purposes of this section and Section 6, it is worth noting the difference between the Carriers’ MVNO customers and their mobile reseller customers. Mobile reseller service providers typically purchase from Carriers and then re-sell ‘white-tail’ products – i.e. complete mobile plans including plan structures, features, inclusions and exclusions. Therefore the products being re-sold by these service providers will usually reflect plan changes – such as the changes to 1800 and 13/1300 charging – that have already been made by the relevant Carrier. This provides a healthy degree of ‘flow-through’ of the commitments and actions being taken by the major service providers under the market-based proposal.

6 Mobile Carriers to Work with MVNOs to facilitate Provision of 13-Friendly Plans (Relates to ACMA Questions 13 and 14)

Mobile carriers will continue to work with their MVNOs and mobile reseller service providers to facilitate the offering of ‘13-friendly’ plans by MVNOs. It should be noted that any MVNOs not already doing so will be highly incentivised by competitive market pressures to include ‘13-friendly’ plans within their overall product suite.

It should be noted that Virgin Mobile Australia (VMA) has indicated that 13/1300 calls are already included within the included value allowance of its included value plans, apart from a minor exception. VMA has further indicated that it can commit to no reduction in availability and inclusion of this feature for new plans.

7 Service providers to undertake (with ACMA & Consumer Reps) Wide-Reaching Consumer Education Programs (Relates to ACMA Question 16)

Building on the requirements of Clause 4.1.2 of the Telecommunications Consumer Protections Code 2012, all service providers commit to ensuring that Critical Information Summaries and/or associated collateral/information provided to consumers taking up mobile plans will make it clear as to whether mobile calls to 13/1300 numbers are:

- included or excluded from the included-value mobile plan allowances; and
- if included, charged at standard national mobile call rates.

Communications Alliance will work with the ACMA and ACCAN to prepare a customer awareness program containing information on these issues, to be disseminated by:

- a. Communications Alliance and its Members on websites etc.
- b. MVNOs, encouraged by Carriers
- c. ACCAN
- d. The ACMA
- e. Other cost-effective channels as may be agreed

8 Service Providers to Conduct Further Research into Nature and Incidence of Consumer Detriment (Relates to ACMA Questions 15 and 17)

Industry believes that consumer 'detriment' relating to these issues should be defined as a consumer suffering financial hardship or affordability issues as a result of making mobile calls to 13/1300 numbers, in circumstances where he/she does not have an opportunity to make such calls in a more affordable manner.

Communications Alliance will examine the potential inclusion in the proposed metrics-related industry-funded quarterly customer satisfaction research poll, a question about any potential residual consumer detriment relating to calls to 13/1300 numbers.

Service providers and Communications Alliance agree to examine – in the light of the planned consumer awareness programs - the need for a separate research project into potential residual consumer detriment. The timing and parameters of such a project would be discussed in advance with the ACMA.

In its consultation paper the ACMA asked: "to what extent is the percentage of customers who exceed their included value allowance likely to increase if Option B is implemented?" The ACMA paper also questions (p.13, para. 2), whether future changes to consumer calling patterns may lead to a greater proportion of consumers exceeding their monthly call allowance.

There is no simple nor definitive answer to these questions, given the number of variables (including human behaviour), involved in the equation. Several pertinent observations can, however, be made.

First, the incidence of consumers regularly exceeding the Voice/SMS allowance of included-value mobile plans has dropped significantly in recent years to significantly less than 10 per cent. This is due to several factors, including that:

- such allowances have become increasingly generous, due to intense commercial competition for mobile customers;
- although total traffic composition will vary from service provider to service provider, mobile calls to 13/1300 numbers typically make up only approximately 1-2% of total mobile call traffic; and
- consumers have become increasingly savvy about how to ensure that they are using an included-value plan that is well suited to their voice and data usage requirements, thereby lessening the likelihood of allowances being regularly exceeded, if ever.

Service providers expect these trends to persist and believe it is very unlikely that consumers risk exceeding their Voice/SMS allowance as a result of the inclusion of mobile calls to 13/1300 numbers.

COMMUNICATIONS ALLIANCE/AMTA RESPONSE TO ACMA PAPER

"Proposed Variation to Numbering Plan – charges for calls to freephone and local rate numbers"

FEBRUARY 2013

9 Impact and Unintended Consequences of ACMA Proposal to Limit Mobile Call Charges to 13/1300 Numbers to 22 cents

As discussed, it is difficult to be definitive about the question posed immediately above by the ACMA. However, industry strongly believes that the alternative – the ACMA proposal to limit mobile calls to 13/1300 numbers to an untimed fee of 22 cents – would result in the majority of consumers paying higher average costs for calls from mobiles to 13/1300 numbers if such calls currently charged as standard calls within included-value allowances are charged for separately, outside included-value plan allowances.

If service providers were to try to retain the calls to 13/1300 numbers within mobile plans that have an included allowance, but charge those calls at a fixed service rate, this would cause consumer confusion and introduce significant cost and complexity in call identification and charging arrangements. The problems arise because to reflect a fixed service call cost of, for example, 22 cents, could require the service provider to adjust the value allowance for the 13/1300 call by an amount in the order of \$2.20 to properly reflect the equivalent value inside an included value mobile plan. (As an illustration, an included value mobile plan may provide an allowance of \$500.00 for a monthly outlay of \$50.00).

More broadly, the fact that the ACMA proposal is retro-focussed on old fixed network local call charging models will inhibit innovation in existing and future pricing models for both mobile services and VoIP services.

By way of example, the Optus '\$2 days' plan is a fairly straightforward proposition for the customer – use the service on any particular day and the maximum you pay is \$2. (Plans of this type are also an excellent tool to enable pre-paid mobile customers to manage and limit their spend on calls to 13 and 1300 numbers). But under the ACMA proposal, if the customer makes only one call on a given day, and this is a call to a 13/1300 number, the resulting Optus charge of \$2, would appear to be a breach of the proposed amendments to the Numbering Plan.

If, as a result, Optus chose to take the 13 calls out of the '\$2 day' included-value calls, then Optus would have to separately deduct 22 cents for each call. This in itself adds complexity and cost to the supply of this service. But more significantly, it is unclear how that 22 cents can be deducted from such a plan without disrupting the number of days available for plan amounts, for example, 5 days for \$10, or leaving value within the plan that cannot be utilised by the customer, for example, a residual value of \$1.78 that could not be utilised without recharging. Put simply, the ACMA proposal is incompatible with what is a successful and consumer-friendly product concept.

Optus also has another plan called "Optus prepaid social" that offers calls to national fixed and mobile services on the basis of minutes of call time. For example the \$30 plan gives up to 250 minutes of voice calls (in 1 minute increments) to national numbers, including 1800/13/1300 numbers. That is around 12 cents a minute if all the \$30 is used for voice. So a one minute call to a 1300 number would clearly comply with the proposed Numbering Plan, but a three minute call may not. At the extreme, a single call to a 13 number for 251 minutes would exhaust the \$30 value of the plan and thus presumably would be deemed by the ACMA to breach the Numbering Plan. So the ACMA proposal would require 13 calls to be separately billed at 22 cents each – effectively destroying a relatively simple pricing model and raising the level of complexity for customers. Once again in this example it is also unclear how the 22 cents from each 13/1300 call would be accommodated within the overall value of the plan.

10 Impact and Unintended Consequences of ACMA Proposal to Limit Fixed Call Charges to 13/1300 Numbers to 22 cents

Industry was surprised by the proposal in the December 2012 Consultation Paper that fixed calls to 13/1300 numbers were proposed be set at a fixed rate referenced in the paper at 22 cents.

This proposal did not figure in the original representations made by consumer representatives and has not been identified as an issue by the ACMA in its discussions with industry over the past two years.

The inclusion of fixed line price controls in the ACMA's latest proposal appears to be a "solution looking for a problem" and is damaging, in industry's view, from several perspectives.

If pursued, this element of the ACMA proposal would result in very significant fixed-line revenues being foregone by service providers. Communications Alliance understands that service providers will provide in confidence to the ACMA more precise data on forecast revenue foregone that will allow the Authority to extrapolate an industry-wide calculation of this impact.

To the extent that this revenue is not simply absorbed by the industry through reduced margins, it will need to be recouped through other means, including via the transfer of additional costs to the B-party owners of 13 and 1300 numbers, and/or through upward pressure on the prices charged for other products and services.

The transfer of additional costs to B-party owners is likely in some cases to result in those companies opting to no longer offer the convenience of a national 13 or 1300 contact number – a result that would constitute an 'unintended consequence' of the ACMA's actions.

The ACMA proposal to apply retail price controls to 13 services is also expected to cause significant disruption to the supply of alarm monitoring services within the 1345 number range. The supply of services within this range is supported by commercially agreed financial arrangements between alarm service providers and carriage service providers. Under the ACMA proposal for retail price maintenance, these arrangements will have to be renegotiated and, to maintain the same overall financial outcomes for the service providers involved, can only lead to increased prices for alarm monitoring services delivered to end users. A great deal of work will be involved that will achieve, at best, no net improvement in the total cost of alarm monitoring services for end users and to solve a problem that is totally unrelated to this market.

Communications Alliance understands at least one service provider has already provided in confidence to the ACMA information about local rate call cost structures and estimated costs of renegotiating commercial contracts with B-party FLRN Operators under the previous proposals outlined by the ACMA. The three mobile Carriage Service Providers are considering what additional cost and plan structure information they are able to in their respective responses to the latest ACMA consultation paper.

11 Agencies Offering Call-Back Facilities

The ACMA Consultation Paper questions at page 13 whether it is possible to work successfully with government assistance agencies that operate customer contact centres using 13/1300-based platforms, to encourage them to place a call-back facility at the beginning of their interactive voice response (IVR) menu, so that clients calling from mobile phones could avoid long and potentially expensive waits in the call queue.

Industry is preparing an approach to Federal and State Governments on this issue, which is a simple and cost-effective way to solve a significant element of the concerns originally raised by consumer groups.

Rather than simply questioning whether such a solution is possible, industry hopes that the ACMA will join with industry and work productively to help ensure that such an outcome is achieved.

12 Status of “Local Rate” in the Numbering Plan

During discussions with industry on these topics, the ACMA has raised an issue regarding use of the term “Local Rate” in the Numbering Plan. The ACMA suggested that while “Free Means Free” is an easily understood slogan it has utilised when publicising the proposal to make mobile calls to 1800 numbers free of charge to the calling party, a similar descriptor is needed to help provide clarity to consumers about what a Local Rate call means from a charging perspective.

Industry has considered this and believes that the more sensible route would be to delete the term “Local Rate” from the Numbering Plan and replace it with a more easily understood term such as “National Access”.

In any event, industry considers that the definitions of the two service types should be aligned in the Numbering Plan and suggests the following draft definitions as a basis for further discussion:

freephone service means a carriage service:

- (a) that is capable of voice telephony; and
- (b) that is not a local service or a national access service; and
- (c) that, for a call, involves the translation of the number dialled in making the call to a number that identifies a point of termination for the call at an end customer; and
- (d) an end customer is issued with a number and is charged for calls to the number for the service; and
- (e) for which:
 - (i) the call charge for calls made to the number for the service using a standard telephone service (other than a location independent communications service or mobile satellite service) is zero; and
 - (ii) responsibility for the residual charge for calls lies with the end customer to whom the number is issued.

national access service means a carriage service:

- (a) that is capable of voice telephony; and
- (b) that is not a local service or a freephone service; and

- (c) that, for a call, involves the translation of the number dialled in making the call to a number that identifies a point of termination for the call at an end customer; and
- (d) an end customer is issued with a number and is charged for calls to the number for the service; and
- (e) for which:
 - (i) the call charge for calls made using a standard telephone service (other than a location independent communications service, mobile satellite service or a public mobile telecommunications service) is equal to, or less than, the call charge for local calls; and
 - (ii) responsibility for the residual charge for calls (if any) lies with the end customer to whom the number is issued.

13 Summary of Recommendations

Industry recommends that the ACMA:

- 1. Resolve to adopt the market-based proposal as the basis for a co-regulatory approach to amending the Numbering Plan and implementing market changes to meet the ACMA's stated objectives on charging of calls from mobile handsets to 1800, 13 and 1300 numbers.*
- 2. Proceed to amend the Numbering Plan to make calls from mobile phones to 1800 numbers free of charge to the calling party from 1 January 2015 – while noting industry's intent to give effect to these changes at an earlier date during 2014.*
- 3. Further amend the Numbering Plan to clarify the definition and name of 'Freephone' and 'Local Rate' services along the lines proposed in S.12 of this submission.*
- 4. Agree to refrain from other direct regulatory intervention in the 1800/13/1300 space, pending a review of the impact and degree of success of the measures in the market-based proposal, to commence a minimum of 12 months after the change to 1800 charging.*
- 5. Enter into dialogue with industry concerning the detailed work program and project plans, to be completed by industry no more than 8 weeks after the ACMA's decision to adopt the market-based model.*
- 6. Agree to work with industry on the approaches to Governments and Government agencies concerning the placement of a call-back facility at the beginning of the IVR menu on agency-owned customer access platforms using 13 or 1300 access numbers.*



**Published by:
COMMUNICATIONS
ALLIANCE LTD**

**Level 9
32 Walker Street
North Sydney
NSW 2060 Australia**

**Correspondence
PO Box 444
Milsons Point
NSW 1565**

**T 61 2 9959 9111
F 61 2 9954 6136
TTY 61 2 9923 1911
E info@commsalliance.com.au
www.commsalliance.com.au
ABN 56 078 026 507**

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