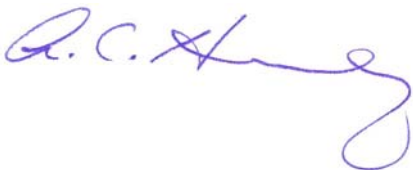Wednesday, 19 April 2006

Manager
Community and National Interest
Australian Communications and Media Authority
PO Box 13112
Law Courts
Melbourne Vic 8010

To whom it may concern,

Please find attached ACIF's submission in response to the Improving Identity Check Processes for Pre-paid Mobile Services discussion paper.

Yours sincerely,

Anne Hurley
Chief Executive Officer
Australian Communications Industry Forum (ACIF)

ACMA DISCUSSION PAPER – IMPROVING IDENTITY CHECK PROCESSES FOR PRE-PAID MOBILE SERVICES
ACIF SUBMISSION

1.   Introduction

ACIF is pleased to have this opportunity to make a submission to the ACMA Discussion Paper 'Improving Identity Check Processes for Pre-paid Mobile Services'.

ACIF's membership comprises carriers/carriage service providers, business and residential consumer groups, industry associations and individual companies. Its mission is to provide leadership through a neutral forum, independent of individual interests, in which all Australian communications industry stakeholders cooperate in the development of initiatives that foster the effective and safe operation of competitive networks, the provision of innovative services and the protection of consumer interests.

ACIF operates on the central premise that the best outcomes for all stakeholders in Australian telecommunications can be achieved by co-operation. In this context, ACIF supports the policy objective of the *Telecommunications Act 1997* to promote the greatest practicable use of industry self-regulation without imposing undue financial and administrative burdens on industry.

This submission addresses only the issue of the administration of a Telecommunications industry account verification system (AVS) *(Section 8.2)*. It does not comment on the proposed changes to improve the identity checking processes that apply for pre-paid mobile services as these are not matters appropriate for comment by ACIF.

The purpose of this submission is to indicate that ACIF is perfectly placed to sponsor discussions to scope an industry-specific AVS and also has in place the necessary established infrastructure to support the operation of a Telecommunications industry account verification system in the event of it moving forward.

2.   Infrastructure to support an AVS

In partnership with Paradigm.One, ACIF has developed infrastructure called the Electronic Information Exchange (EIE) which enables business-to-business e-commerce systems. The topography of EIE allows both centralised and decentralised applications to be deployed or even applications that are a combination of both.

The EIE Infrastructure is ideally suited for an account verification system. Currently the industry uses the EIE for a number of applications, including the AMTA IMEI Lost and Stolen Register, the MCF RF National Site Archive and SEDNode - Secure Electronic Delivery of Requests and Disclosures by LEAs and C/CSPs.

Significant investment has already been made in EIE infrastructure with the aim of streamlining the effort and costs involved in bringing on new applications. Therefore the deployment of a new application such as an AVS would not involve significant initial and ongoing costs, and can be done in a reasonable timeframe with less risk. Instead of procuring the infrastructure which would be needed to support an AVS from vendors (incurring costs and possible time delays) existing EIE spare infrastructure capacity can be utilised at a fraction of the effort and cost.

3.   Conclusion

There is a significant role for industry-led solutions involving access to online, real time systems. ACIF has a history of successful responses to the development of industry-wide business-to-business systems.

The policy of the Telecommunications Act 1997 is to promote the primacy of industry self-regulation. ACIF's lengthy experience and substantial involvement in the industry activity on the EIE means it is well placed to play a role in leading industry solutions.