

26 August 2021

Ms Kate O'Rourke  
First Assistant Secretary, Consumer Data Right Division  
The Treasury  
Langton Crescent  
Parkes ACT 2600

ACMA file reference: ACMA2021/290-7

Dear Ms O'Rourke

### **Consumer Data Right sectoral assessment consultation**

Thank you for your invitation to provide input into the sectoral assessment of the telecommunications sector the Government is conducting under the Consumer Data Right (CDR) framework.

As the primary sector-specific regulator for telecommunications the ACMA aims to maximise the economic and social benefits of telecommunications services for all Australians. We recognise the potential benefits that the rollout of the CDR to telecommunications could have for consumers and the overall functioning of the telecommunications market. However, careful consideration about how any telecommunications CDR would be implemented will be needed to ensure clarity and efficiency of regulatory requirements for the telecommunications industry and the minimisation of associated compliance costs.

This letter responds to key issues raised in the Telecommunications Sectoral Assessment Consultation Paper where the ACMA has expertise or information to contribute.

### **What is the 'telecommunications sector' for the purposes of CDR?**

The ACMA is responsible for regulating the 'telecommunications industry' in accordance with the framework set out in the *Telecommunications Act 1997* (the Act). At a minimum, we consider that any definition of 'telecommunications sector' adopted for the purposes of the CDR should include all carriers and carriage service providers (CSPs) subject to this framework.<sup>1</sup>

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<sup>1</sup> Under the Telecommunications Act 1997, 'telecommunications industry' is defined to include:

- carrying on business as a carrier or carriage service provider
- supplying goods or services for use in connection with the supply of a listed carriage service or supplying a content service using a listed carriage service
- manufacturing or importing customer equipment or customer cabling

However, we note that there is no definitive list of providers subject to the Act. While telecommunications carriers must hold a carrier licence, CSPs do not need to register or be authorised to provide telecommunications services. It is estimated there are now over 1,300 providers operating in the market.<sup>2</sup>

It is often a non-trivial process to determine whether a particular communications provider meets the definitional requirements to be considered a CSP. Individual service delivery models must sometimes be assessed on a case-by-case basis, and changing business models mean that the entities within scope of the CSP definition can shift quite quickly.

In addition, we recognise that many communications services are supplied by providers unlikely to fall within the framework of the Act. For example, this may include some 'over the top' (OTT) communications services provided by non-CSP third parties used in connection with existing carriage services, such as communications apps.

While we have research that indicates the use of these services is increasing,<sup>3</sup> we have limited information about the dynamics of consumer choice in this part of the market. There are many communications apps consumers can download and use for free or for a cost, and these services and the way they allow consumers to communicate is continuing to evolve.

We do know that apps often collect a range of consumer data – including advertising identifiers<sup>4</sup> and location information,<sup>5</sup> as well as information about when and how a consumer uses the app. This is valuable data that app providers or organisations they partner with may use for purposes including targeted advertising and product development.

We consider it is important that the CDR covers products and services of importance to telecommunications consumers now and in the future. For that reason, we suggest further consideration should be given on the extent to which OTT services are being used by consumers in place of traditional telecommunications services, with a view to bringing providers of these services into the future CDR framework. The ACMA would be pleased to assist with any such process.

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•installing, maintaining, operating, or providing access to a telecommunications network or a facility used to supply a listed carriage service.

<sup>2</sup> The Telecommunications Industry Ombudsman reported over 1,400 members at June 2020. [TIO Annual Report 2019–20](#)

<sup>3</sup> The ACMA's 2020 consumer survey found three in four Australians (77 per cent) had used an app to make calls or send messages in the past six months. [Trends in online behaviour and technology use](#), September 2020

<sup>4</sup> An identifier is a unique number that uniquely identifies a mobile device and can be used to track users over time and across services. ACCC [Digital Platform Services Inquiry Interim Report](#), p5, September 2020

<sup>5</sup> [ACCC Digital Platform Services Inquiry Interim Report](#), p5, September 2020

## What is 'telecommunications data' for the purposes of CDR?

We agree with the proposed designation of product data and consumer data under the CDR. The list of proposed consumer datasets in the Consultation Paper appears appropriate. Most telcos should have this data or be able to obtain it from their wholesale provider. However, we note that where a retailer is expected to pass on data from a wholesaler or other secondary data holder there will need to be clear obligations on the secondary data holder to keep the relevant data and provide it on request.

The list of proposed product data in the consultation paper covers key datasets that will assist consumer decision making. The ACMA's Telco consumer experience survey<sup>6</sup> investigated factors affecting consumers' experience with their telecommunications services. While price was important to many consumers, other non-price factors ranked higher overall for Australian adults and households:

- Among Australian adults, the factors most frequently rated as important in relation to their mobile phone or mobile broadband data service were issues and faults being fixed (85 per cent), mobile coverage (84 per cent) or good customer service (81 per cent).
- Households prioritised issues and faults being fixed (92 per cent), the protection of personal information (90 per cent) and good customer service (86 per cent).

We suggest consideration be given to expanding the list of product data within scope of the CDR to include a broader range of data that could assist with informing consumers about factors important to them, such as:

- Customer service data – including information about complaints handling performance, contact wait times, and available methods of contact
- Advertised connection and repair timeframes and provider performance against these timeframes
- Service quality data including outage history for each provider, and data on latency and data packet loss
- Hardware requirements and compatibility specifications associated with a particular service and service provider.

Another area for potential future consideration involves data about scam activity and disruption efforts by providers - to the extent these provide meaningful data to consumers. At present, it is not possible to quantify with any accuracy the scale of scam activity targeting consumers, and, consequently, provider-level detail about disruption activity (for example, numbers of blocked calls) may be misleading to consumers without context. We note that some third-party apps and/or websites provide what is essentially crowd-sourced data and information about likely scam activity, and, as per comments above, it may be useful to consider how this type of information may be of use to consumers, including those who use OTT services.

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<sup>6</sup> [ACMA Telco consumer experience survey - Australian adults and households: Phone and internet services](#), October 2020

Some telcos provide access to, and support for, certain complementary services as part of the services they offer to consumers. For example, in 2020 Telstra launched ‘Telstra Calling for Microsoft Teams’ to support businesses looking to adopt Teams as their primary communications tool.<sup>7</sup> Data about the existence of these additional offerings could, and probably should, be included as part of any product data under the CDR as it may influence choice of telco provider.

### How CDR could assist telco consumers

In recent years there have been indications the telecommunications industry has delivered a poor experience for some consumers in areas including customer service, selling/contracting, and financial hardship.<sup>8</sup> This can have a particularly detrimental impact on certain cohorts of consumers, particularly those who are in vulnerable circumstances, and small businesses. The problem is exacerbated by relatively low levels of switching, which we consider is at least partly attributable to the difficulty of comparing providers and plans, both on price and non-price factors.<sup>9</sup>

This difficulty results from the complex variety of products in the market, which can make it challenging for a consumer to compare ‘like with like’ and make meaningful comparisons. In addition, the ACMA’s inability to report on individual providers’ performance in key areas limits the ability for consumers to make decisions on matters other than price.

We expect the CDR could enable consumers to more readily compare features of offers and the performance of different telcos, potentially by:

- enabling like-to-like comparisons of features of offers that are otherwise difficult to compare, by standardising the expression of those features for the purpose of supplying product data
- making available performance data that is not currently available, such as outages, contact wait times and complaint resolution timeframes
- making available directly comparable mobile coverage data – currently there is a lack of transparent and consistent network coverage information (including data on applicable technology and quality of service in a particular area) limiting a consumer’s ability to choose a suitable mobile service and service provider.<sup>10</sup>

One of the most frequently cited use cases for the CDR is to enable consumers to consent to an accredited third party accessing their data and using it to provide advice about telco products and services suited to their needs, based on their actual usage. We agree this will improve consumers’ ability to exercise informed choice by effectively allowing a consumer to outsource the burden of

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<sup>7</sup> [Telstra Calling for Microsoft Teams powers collaboration around the world](#), Telstra Media Release, 16 July 2020

<sup>8</sup> The ACMA’s consultation paper [Consumer vulnerability: expectations for the telecommunications industry](#) lists some recent evidence of consumer detriment caused by poor telco practices.

<sup>9</sup> More detail about the ACMA’s views on consumer choice and fairness is available in the [ACMA submission to Consumer Safeguards Review Part C: Choice and Fairness](#), September 2020.

<sup>10</sup> Australian Competition and Consumer Commission, [Measures to address regional mobile issues](#), October 2017, p.8.

understanding their personal usage patterns and analysing these to select a service suited to their needs. This would reduce costs to a consumer associated with changing providers by reducing the time needed to evaluate and assess a variety of complex offerings, and reducing the impact of information overload. This could be of particular value to small business consumers with limited resources and a high level of dependency on service continuity.

Another valuable use case that may be made possible by the CDR would be using consumer data to assess sources of debt of those in financial hardship and determining ways of better managing that debt. This could assist those consumers who find it difficult to access appropriate support, with the ACMA's most recent financial hardship 'state of play' report indicating that for 2019-20, less than half (46.7%) of residential customers exiting a financial arrangement (across 9 telcos) did so successfully.<sup>11</sup>

The CDR could enable a consumer to consent to a third party accessing their data from multiple different sectors where the CDR has been rolled out to get a more holistic picture of a consumer's financial hardship and the support available to them. The third party could use this data to provide advice on options or liaise with providers on the consumer's behalf to manage the debt.

The Thriving Communities Partnership (TCP) has recently piloted a cross-referral program enabling consumers of a select group of partner organisations (including Telstra and several energy and water providers) to access two or more hardship support programs by contacting just one provider and providing consent for cross referral.<sup>12</sup> TCP estimates that 12% of the population are eligible for but are not accessing the support offered by corporate hardship programs. The pilot appears to have improved awareness of and access to these programs. The CDR could simplify consent and data sharing processes for similar initiatives.

## **Privacy and confidentiality**

We acknowledge the importance of ensuring high levels of privacy and data security apply to telecommunications consumer data.

When designating the telecommunications sector, specific consideration should be given to risks including:

- the possibility of vulnerable consumers being exploited by trusted parties obtaining access to consumer data and misusing that data for their own benefit (for example elderly people being exploited by carers or relatives)
- victims of family violence being exposed to further risk of violence by a perpetrator acquiring access — for example, through being a primary account-holder — to certain categories of consumer data that could reveal a victim's location or increase other vulnerabilities.

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<sup>11</sup> Australian Communications and Media Authority (ACMA), [Customer financial hardship in the telco industry: State of play report 2019–20](#), ACMA website, February 2021

<sup>12</sup> Thriving Communities Partnership, [Cross Referral Project](#), accessed 11 August 2021

We also note that certain risk profiles may change with the inclusion of another sector of data under the CDR regime and that assessment of this risk needs to take into account existing access for other sectors.

We understand that consumers can choose whether to engage with the CDR and that data recipients are accredited by the ACCC and required to maintain high levels of data security to ensure privacy is protected. It is appropriate that any data sharing under the CDR occurs only under a narrow and strict consent regime. We trust that Treasury will continue to engage with the Office of the Australian Information Commissioner to ensure that CDR privacy protections are appropriate for telecommunications and other sector data and adequately protect telecommunications consumers.

### **Taking existing regulation into account**

We recommend leveraging existing information requirements when considering how to rollout CDR to telecommunications. We have prepared an attached table summarising existing data collection and reporting requirements within the ACMA's remit.

Of particular relevance are obligations requiring retail service providers to provide consumers with a:

- “critical information summary” for each offered product, service and plan, setting out key information about what is included and excluded, and terms and conditions;<sup>13</sup> and
- “key facts sheet” for any NBN services offered, including information about speeds, what the plan can be used for, and what happens during a power failure.<sup>14</sup>

These requirements are intended to help consumers make informed purchasing decisions by making it easier to compare products and services. However, there are limitations. There is a risk of information overload where more information does not necessarily equate to better choices.<sup>15</sup> The documents are not required to be provided in a standardised format and are often required to be downloaded separately online, making comparisons time consuming. Collecting the information included in these documents as part of the CDR in a standardised machine-readable form could dramatically improve the usability of the data.

In addition to information requirements applying to providers, the ACMA collects data from service providers under specified rules. For example, the Telecommunications (Consumer Complaints) Record Keeping Rules require retail providers with 30,000 or more services in operation to keep certain records of complaints by service and type, and report to us. This covers approximately the top 30 telcos in the market. We also collect data to inform compliance work and other reporting activities, using our information gathering powers under the Telecommunications Act.

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<sup>13</sup> Clause 4.2, [Telecommunications Consumer Protections Code](#)

<sup>14</sup> [Telecommunications \(NBN Consumer Information\) Industry Standard 2018](#)

<sup>15</sup> ACMA and BETA, [A better practice guide for NBN providers: Improving information provision to customers using behavioural insights](#), (2018), pp. 10–13, accessed on 4 August 2021.

While we report publicly on data we receive at an aggregated level, we are unable to report on individual provider performance due to legal constraints.

This means our ability to use data to inform consumer choice is restricted. The lack of information available to consumers about the actual performance of different products or services, or different providers makes it difficult for consumers to make decisions on non-price factors.

### **Proposed data sharing model**

We appreciate that proposed data sharing models have been refined as the CDR has been rolled out. We welcome the intention to apply learnings from the rollout of CDR to the banking and energy sectors when designating the telecommunications sector.

We support the proposed peer to peer model for telecommunications, which we understand would align broadly with the approach taken in energy and banking. The telecommunications supply chain can be complex. It is appropriate that the retail service provider with which a consumer has a contract is the primary data holder in the telecommunications context.

However, as noted in the consultation paper, there are likely to be multiple secondary data holders that could be required to provide data to a primary data holder as part a CDR request. This may make the role of a primary data holder complex, as they would need to have sophisticated authentication, data transfer, and privacy and security processes in place. As noted above, any requirement for a retailer to collect and pass on data from a secondary data holder would need to be supported by clear obligations on the secondary data holder to keep relevant data and provide it to the primary data holder on request.

We support the suggestion in the Consultation Paper that smaller providers be allowed to achieve CDR compliance by outsourcing responsibility for authentication and some data provision to a larger secondary data holder sitting one step down the supply chain (for example a reseller having their wholesaler provide consumer data). To avoid any confusion in the customer experience, interaction with the consumer would still be via the retailer as primary data holder.

We understand there is a possibility that the ACMA could be designated a data-holder due to its data holdings, such as the data collected from providers under the Telecommunications (Consumer Complaints) Record Keeping Rules. We consider this unlikely under the peer-to-peer model given data collected from providers will necessarily be held by the providers themselves. However, if consideration is being given to designating the ACMA, we would appreciate being consulted as early as possible given the legal complexities associated with the ACMA's use of data it collects from providers.

### **Existing digital capabilities**

As a result of our work, we know that the data management systems of top and mid-tier providers are often highly complex, and many have issues with data integrity. Our experience indicates that at any time, one or more top tier provider is undertaking a major transformation or uplift of its data management systems, leading to complex data migration, and resistance to new data requirements

being added while these processes are in train. The CDR rollout represents an opportunity to improve data management systems across the industry and encourage greater consistency in data collection and reporting. However, sufficient time will need to be allowed for providers to develop and implement new processes, with particular consideration given to transitional arrangements given the diversity in the telecommunications market, such as later start dates for smaller providers.

On the consumer side, we know that young Australians rely heavily on digital technology across many aspects of their lives and are strong adopters of mobile technology, using an increasing number of platforms and apps.<sup>16</sup> Amongst older Australians there is increasing engagement in a broader range of online activities, more frequently and across different devices<sup>17</sup>. However, this seems to be out of a feeling of necessity rather than choice – in 2020 34% of older consumers surveyed considered computers and technology gave them more control over their lives (compared to 84% in 2017).<sup>18</sup> This suggests that while many consumers will be willing to engage with the CDR and provide consent using digital tools and authentication procedures, the benefits are likely to be disparate among telecommunications consumers.

The ACMA would welcome the opportunity to further discuss the CDR rollout and provide any additional information to inform the Telecommunications Sectoral Assessment. The ACMA contact until 31 August 2021 is Vince Humphries, Executive Manager, Telecommunications Safeguards (EM TS) on 03 9963 6844 or [vince.humphries@acma.gov.au](mailto:vince.humphries@acma.gov.au). The ACMA contact from 1 September 2021 is Paul Miszalski who will be acting EM TS and can be contacted on 03 9963 6963 or [paul.miszalski@acma.gov.au](mailto:paul.miszalski@acma.gov.au).

Yours sincerely



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<sup>16</sup> ACMA, [The digital lives of younger Australians](#), (May 2021), accessed on 4 August 2021.

<sup>17</sup> Of older people (65+) surveyed, 55% used an app to communication in the previous 6 months to June 2020, compared to 33% in 2019. ACMA, [The digital lives of older Australians](#), (May 2021), accessed on 4 August 2021.

<sup>18</sup> ACMA, [The digital lives of older Australians](#), (May 2021), accessed on 4 August 2021.



## Existing collection or reporting requirements

This table sets out existing collection or reporting requirements applying to the telecommunications sector and a description of the data required to be collected or reported each. The rules set out in the table are limited to those within the ACMA's responsibility. There are other rules applying to the telecommunications industry that may be relevant, including rules applied by the ACCC such as the [NBN Services in Operation Record Keeping Rules Disclosure Direction](#) which is used to facilitate the ACCC's [NBN Wholesale Market Indicators Reports](#) and the ACCC's [Internet Activity Record Keeping Rule](#) which facilitates the ACCC's Internet Activity Report.

Existing collection or reporting requirement	Data required to be collected/reported	Limitations
<a href="#">Telecommunications Consumer Protections Code</a> (TCP Code)	<ul style="list-style-type: none"> <li>• Clause 4.2 requires Suppliers to provide consumers with a critical information summary (CIS) for each of its current offers.</li> <li>• Clause 4.4.1 requires Suppliers to provide information to consumers about the main features of any telecommunications goods supplied by a third party as part of the offer.</li> <li>• Clause 4.2 requires Suppliers to provide, in addition to information on charges and fees the following information in the CIS:             <ul style="list-style-type: none"> <li>➤ a description of the telecommunications service to be provided under the offer, including inclusions</li> <li>➤ a description of other telecommunications services included in the bundle, if part of a bundling arrangement</li> <li>➤ any telecommunications good that the customer must take as a mandatory component of the offer, a description of the good and the separate charge for the mandatory good if not already built into the summary of offer disclosed</li> <li>➤ any exclusions, conditions, limitations or qualifications of the offer, such as mobile data auto top-ups</li> <li>➤ sufficient data for a customer to determine an approximate early termination fee applicable at any time during the minimum term</li> <li>➤ warnings about roaming costs.</li> </ul> </li> <li>• Clause 4.2.2 requires Suppliers to include the following information about charges in the CIS:             <ul style="list-style-type: none"> <li>➤ minimum monthly charge</li> <li>➤ maximum monthly charge</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• CIS requirements of the TCP Code applies to all telecommunications services.</li> <li>• We understand wait time and first contact resolution rates are measured for the purpose of monitoring. However, this information is not required to be published or otherwise provided to consumers.</li> <li>• While Suppliers are required to provide a CIS for special promotions, they are not required to specify the differences between the special promotion and the underlying offer.</li> <li>• Maps and diagrams required under the TCP Code may be of limited value to consumers due to lack of pinpoint location specificity.</li> </ul>

Existing collection or reporting requirement	Data required to be collected/reported	Limitations
	<ul style="list-style-type: none"> <li>➤ maximum charge payable for early termination</li> <li>➤ minimum term applicable</li> <li>➤ where the offer is not unlimited, the cost (prior to any discounts being applied) of making a 2 minute standard national mobile call</li> <li>➤ cost of sending an SMS</li> <li>➤ cost of using 1 megabyte of data within Australia for plans that are not unlimited</li> <li>➤ warnings about roaming costs.</li> <li>• Clause 4.7 requires Suppliers undertake the following actions to ensure customer enquiries are dealt with in a timely and effective manner: <ul style="list-style-type: none"> <li>➤ monitor average wait times</li> <li>➤ monitor first contact resolution.</li> </ul> </li> <li>• Clause 4.3.1 requires additional relevant information to be provided such as: product description, manufacturer's information, main features of the good, and billing and payments information. Suppliers are also required to make available to consumers a map or diagram of the mobile coverage.</li> </ul>	
<p><a href="#"><u>Telecommunications (NBN Consumer Information) Industry Standard 2018</u></a> (Consumer Information Standard)</p>	<ul style="list-style-type: none"> <li>• Retail CSPs are required to publish a Key Facts Sheet about the NBN plans they offer, including: <ul style="list-style-type: none"> <li>➤ maximum attainable speed during the off-peak period</li> <li>➤ typical busy period download speed and the hours to which this applies – for fixed line</li> <li>➤ level of online usage relevant to the NBN plan that can be supported during the busy period.</li> </ul> </li> <li>• Retail CSPs are required to explain to the consumer the information in the Key Facts Sheets including remedies available to the consumer where the physical telecommunications network infrastructure underlying the consumer's FTTB, FTTC or FTTN connection to the NBN is not capable of providing the speed tier of the consumer's NBN plan.</li> </ul>	<ul style="list-style-type: none"> <li>• The obligations in the Consumer Information Standard are limited to services provided over the NBN.</li> </ul>

Existing collection or reporting requirement	Data required to be collected/reported	Limitations
<p><a href="#">Telecommunications Service Provider (NBN Service Migration) Determination 2018</a> (the Determination)</p>	<ul style="list-style-type: none"> <li>The Determination requires CSPs to conduct line capability assessment of next-generation NBN broadband service when those services are activated – i.e. when a service is initially migrated to the NBN. Line capability testing determines the layer 2 line rate and is performed on the part of the network unique to the consumer.</li> </ul>	<ul style="list-style-type: none"> <li>Line capability assessment requirement only applies to NBN copper-based access technologies (i.e. fibre to the node/curb/building).</li> <li>This information is not available before activation and is therefore not relevant to a pre-purchase scenario.</li> </ul>
<p><a href="#">Telecommunications (Consumer Complaints) Record-Keeping Rules 2018</a> (Complaints RKR)</p>	<ul style="list-style-type: none"> <li>Qualifying CSPs are required to keep records and provide the ACMA with information about the: <ul style="list-style-type: none"> <li>➤ number of services supplied</li> <li>➤ number of complaints received by type of service</li> <li>➤ average number of days taken to resolve a complaint</li> <li>➤ number of days taken to resolve at least 80% of complaints</li> <li>➤ top three complaints types by volume</li> <li>➤ number of Telecommunications Industry Ombudsman (TIO) Referral complaints received</li> <li>➤ number of complaints relating to connection</li> <li>➤ number of complaints relating to faults</li> <li>➤ number of complaints relating to speed</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Complaints RKR data is limited to CSPs that supply more than 30,000 services in operation.</li> <li>Complaints RKR data is not required to be published or provided to consumers, and the ACMA is not permitted to publish information that can be identified at the provider level.</li> </ul>
<ul style="list-style-type: none"> <li><a href="#">Telecommunications (Customer Service Guarantee) Standard 2011</a> (CSG Standard).</li> <li><a href="#">Telecommunications (Customer Service Guarantee) Record Keeping Rules 2011</a> (the CSG RKR)</li> <li><a href="#">Telecommunications (Customer Service Guarantee – Retail Performance Benchmarks) Instrument (No. 1) 2011</a> (the CSG Benchmarks)</li> </ul>	<ul style="list-style-type: none"> <li>The CSG Standard sets performance standards and damages payable for contravention of performance standards applying to carriage service providers (CSPs) in the provision of voice phone services.</li> <li>The CSG RKR and CSG Benchmarks require qualifying CSPs to report against the CSG Standard. This involves reporting data including the following to the ACMA on an annual basis: <ul style="list-style-type: none"> <li>➤ the number of connection requests and the extent to which connection timeframes were met (nationally and disaggregated at urban, major rural, minor rural and remote area levels)</li> <li>➤ the number of fault repair requests and the extent to which fault repair timeframes were</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>CSG Standard only applies to voice phone services and is only mandatory for Telstra as the Primary Universal Service Provider. Exemptions from the CSG Standard performance standards include: mass service disruptions or where a customer agrees to waive their CSG rights and protections.</li> <li>CSG RKR data is limited to qualifying CSPs (QCSPs). A carriage service provider is a QCSP for a CSG benchmark period if, on the last day of the financial year preceding that benchmark period, the CSP supplied 100,000 CSG services or more. The number of QCSPs has been decreasing over recent years due to the increased use of waiver provisions. There were 3 QCSPs for 2019-20.</li> </ul>

Existing collection or reporting requirement	Data required to be collected/reported	Limitations
	<p>met (nationally and disaggregated at urban, rural and remote area levels)</p> <ul style="list-style-type: none"> <li>➤ the number of appointments and extent to which appointments were kept (nationally).</li> </ul>	
<p>Under the <a href="#">Telecommunications (Carrier Licence Conditions - Telstra Corporation Limited) Declaration 2019 (CLCs)</a>, Telstra is required to offer priority assistance services to eligible customers with life-threatening medical conditions. Other providers who choose to offer priority assistance are required to meet minimum industry standards set out in the industry code <a href="#">C609:2007 Priority Assistance for Life Threatening Medical Conditions</a>.</p>	<ul style="list-style-type: none"> <li>• Clause 12 of Telstra's CLCs requires to report the following annually to the ACMA: <ul style="list-style-type: none"> <li>➤ the number of requests for priority assistance connections in urban, rural and remote areas;</li> <li>➤ the proportion of requests for priority assistance connections in urban, rural and remote areas meeting the priority assistance policy service connection fulfilment objectives</li> <li>➤ the number of requests for priority assistance service restoration in urban, rural and remote areas</li> <li>➤ the proportion of requests for priority assistance service restoration in urban, rural and remote areas meeting the priority assistance policy service restoration objectives.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• The ACMA's Priority assistance data is limited to certain Telstra customers that qualify for this service according to Telstra's Priority Assistance for Life Threatening Medical Conditions policy.</li> <li>• This information is not required to be published or otherwise provided to consumers.</li> <li>• Telstra voluntarily publishes its performance against PA service connection fulfilment objectives and service restoration objectives.</li> <li>• The ACMA is not permitted to publish information that is identifiable of any provider.</li> </ul>
<p>Part 4 of Schedule 2 of the <a href="#">Telecommunications Act 1997</a> sets out rules for CSPs about their Integrated Public Number Database (IPND) obligations. CSPs are also required to follow the <a href="#">Industry Code C555:2020 Integrated Public Number Database (IPND)</a> and related guideline <a href="#">G619:2017 IPND Data</a>. Telstra manages the IPND under the <a href="#">Telecommunications (Carrier Licence Conditions - Telstra Corporation Limited) Declaration 2019</a>.</p>	<ul style="list-style-type: none"> <li>• Information CSPs are required to provide includes: <ul style="list-style-type: none"> <li>➤ the public number</li> <li>➤ the name of the customer</li> <li>➤ the name of the CSP</li> <li>➤ the service address of the customer</li> <li>➤ an alternat address flag to indicate that a service may not be at the customer's address</li> <li>➤ a contact name and number for the customer if the alternate address flag is set to 'true'</li> <li>➤ whether the service is listed or unlisted (private)</li> <li>➤ the name and address of the customer to appear in public number directories for listed services</li> <li>➤ whether the service is to be used for government, business, charitable or private purposes</li> <li>➤ the type of service (e.g. fixed, mobile or premium service).</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• IPND information is required for all services including data-only services. IPND information is not required to be published or otherwise provided to customers unless the customer requests access to their record.</li> </ul>