30 January 2017

Manager, National and Community Interests
Australian Communications and Media Authority
Department of Communications and the Arts
PO Box 13310
Law Courts
Melbourne, VIC 8010

Via online application form: www.acma.gov.au

IFC 37/2016 – REMAKING THE TELECOMMUNICATIONS IPND SCHEME

The Australian Communications and Media Authority (ACMA) has called for submissions on its Remaking the Telecommunications Integrated Public Number Database (IPND) Scheme consultation paper, and on the Draft Telecommunications (IPND) Scheme 2017 (“the Scheme”).

We have reviewed the consultation paper and the Scheme. Optus does not expect the changes to impact its business and we do not have any objections to the proposed text. Nonetheless we have some general comments, and we ask that these are taken into account in your considerations while refining the text of the Scheme.

In particular, the following should be emphasised:

- The need to preserve customer privacy, by protecting personal information contained in the IPND. We understand that research representative bodies could disclose de-identified customer data to members, however, in light of developments in re-identification and data matching, any changes to the Scheme need to mitigate the risk of de-identified data being subsequently recombined with other datasets to identify individuals and potentially breach their privacy.
- The need to maintain appropriate security standards and controls to protect IPND data, both in the way it is supplied to entities under the Scheme, and in the way they store and handle the data. This includes secure disposal of data when it is no longer required for approved purposes under the Scheme.

For any queries on this letter please contact me on (02) 8087 9981 or via email, ivor.king@optus.com.au

Ivor King
Senior Regulatory Analyst