



19 March 2020

Eve Osiowy
Manager
Numbers Section
Australian Communications and Media Authority
PO Box 13112 Law Courts
Melbourne VIC 8010

By email: Numbering@acma.gov.au

Dear Eve

RE: Review of Telecommunications (Provision of Pre-Selection) Determination 2015

ACCAN thanks the ACMA for the opportunity to comment on the review of the Telecommunications (Provision of Pre-Selection) Determination 2015 (hereafter the Determination).

In 2013, ACCAN noted a lack of consumer demand for pre-selection, and for this reason considered that only services delivered via copper network should be eligible for pre-selectable services.¹

ACCAN does not have access to granular data on the number of consumers and small businesses actively using pre-selectable services, or the number of NBN fixed wireless or satellite consumers that will retain access to these services into the future. We urge the ACMA to investigate this matter further with Telstra and other the RSPs in order to assess the true impact of revoking or varying the Determination. Should the Determination be revoked or varied, the ACMA should establish transitional measures for affected consumers, especially in the interest of small business owners with whom pre-selectable services have traditionally been popular.

¹ ACCAN 2013, 'Deregulation: Initiatives in the Communications Sector', <https://www.communications.gov.au/sites/default/files/submissions/ACCAN.PDF>, p. 5

Australian Communications Consumer Action Network (ACCAN)
Australia's peak body representing communications consumers

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The communications landscape has changed dramatically since the introduction of pre-selection. Various developments in the communications market have reduced consumer demand for pre-selectable services, for example:

- Demand for fixed-line voice services has been steadily dropping,²
- Fixed-line voice services delivered via the NBN are not eligible for pre-selectable services,³
- International calling rates are relatively similar between providers, and many providers offer capped call rates or international calling bundles,
- Over-the-top messaging and calling apps like Skype or WhatsApp have emerged as popular alternative international calling options, and
- Legacy voice service plans often include unlimited national calls, along with capped mobile calling rates.

For these reasons, we understand that pre-selection is no longer necessary to support competitive pricing for residential and small business consumers making long-distance, international and mobile calls via the copper network. We expect that the removal of the Determination will result in limited impact and minimal harm for these consumers. However, while ACCAN has limited scope to address this issue, we recognise that the impact of removing or restricting the Determination on larger businesses may warrant a modified approach.

As mentioned above, further investigation into the number of consumers using pre-selectable services, and the extent to which they are used, will provide more accurate information on the impact the Determination's withdrawal, and the transitional arrangements that should be made.

ACCAN has no objection to the ACMA taking steps to revoke the Determination, so long as consumers and small businesses currently using pre-selectable services are provided with adequate information and support during the transition away from these services. Service providers must ensure that that any transitional arrangements:

- impose no additional costs on consumers and small businesses,
- meet consumer needs, and
- provide an equivalent service.

In addition, we consider it prudent for the ACMA to delay revoking the Determination once consumers in the fixed NBN footprint are fully transitioned to the NBN. This will limit disruption and confusion for users of pre-selection who are yet to transition their voice services to the new network.

² ACMA 2020, 'Communications Report 2018–19', <https://www.acma.gov.au/sites/default/files/2020-02/Communications%20report%202018-19.pdf>, p. 4

³ ACMA 2015, Telecommunications (Provision of Pre-selection) Determination 2015, S5.2, <https://www.legislation.gov.au/Details/F2015C00750>,

If you wish to discuss our position further, please contact Rebekah Sarkoezy (Policy Officer) at Rebekah.Sarkoezy@accan.org.au, or call (02) 9288 4000.

Yours sincerely,

A handwritten signature in black ink that reads "Teresa Corbin". The signature is written in a cursive style with a prominent flourish at the end.

Teresa Corbin
Chief Executive Officer