

30 April 2020

Emma Bain
Assistant Manager – Policy & Projects
Numbers Section
Australian Communications & Media Authority

Via email: emma.bain@acma.gov.au

Dear Emma

I refer to my email to you of 21 April 2020 advising that Localsearch had been contacted by a member of the public claiming Localsearch had published their unlisted telephone number.

In accordance with the recommendations contained the ACMA correspondence to Localsearch of 17 April 2020 and your email response to me on 23 April 2020, and in accordance with the IPND Scheme 2017 subsection 3.12 Conditions to which final authorization is subject, Localsearch took the following steps:-

1. David Holihan, Chief Strategy Office for Localsearch contacted the affected customer on Tuesday 21 April 2020. The account holder advised David that they had connected a new number for the purposes of connecting the NBN and that they did not require the number to be listed. The account holder advised that they had no concerns regarding safety or security, rather that it was an issue of inconvenience. Mr Holihan offered to cover the costs of a new number however the account holder declined to take up the offer. Mr Holihan advised the customer of their rights to contact the ACMA and the Office of the Information Commissioner should they be unsatisfied with Localsearch's handling of the matter.
2. Advised the ACMA in writing via email dated 21 April 2020 that Localsearch had received a complaint from a member of the public regarding the publication of an unlisted number.
3. Immediately upon establishing the validity of the claim Localsearch took steps to remove and destroy all customer data relating to the number.
4. Immediately initiated an investigation into the events surrounding the publication of the number.

In answer to the request for further information raised in email from Emma Bain of ACMA dated 23 April I respond as follows:-

Request for further information

- any specific circumstances known to Localsearch relating to the privacy or safety of the affected customer
 - A. The account holder advised that there were no safety or security issues relating to the publication of the number.
- whether the number was previously a listed number, and if yes, the date on which the IPND Manager notified Localsearch that the number had changed from listed to unlisted
 - A. The number was not a previously listed number.
- whether other numbers from the same IPND Manager datafile are also affected

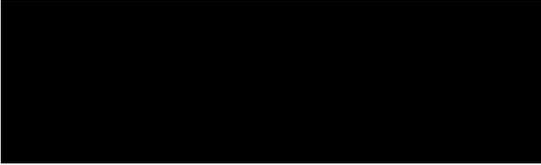
- A. There is no existing data in our database for every other instance of an unlisted instruction in the relevant IPND Manager datafile. Every other unlist instance was processed correctly and data destroyed.
- the circumstances leading to the publication of the number, including dates
 - A. Localsearch received an IPND data file on 8 November 2019. The single datafile contained two distinct instructions for the number. One instruction was an unlist (UL) and one instruction was a list (LE). In November 2019 our former Chief of Data, [REDACTED] was continuing to develop automation processes within our listings database. [REDACTED] it has been determined that [REDACTED] development was, at that time and in fact up to the date of his departure, in part automated and in part manual in that [REDACTED] was manually checking the automation [REDACTED] had developed and making manual alterations where necessary. [REDACTED] It is our conclusion (without the ability to confirm this categorically) that in the case of the number in question [REDACTED] has manually accepted the list (LE) instruction and ignored the unlist (UL) instruction contained in the file.
- where, and what dates, the number was published (including, if applicable, online)
 - A. [REDACTED] printed directory published early 2020. The number is not published in any online directory.
- how Localsearch became aware of the incident
 - A. Localsearch was contacted by the account holder.
- actions to date to minimise the effects of the publication.
 - A. Localsearch immediately contacted the account holder to discuss and offer support. Localsearch contacted the ACMA to report the potential publication of an unlisted number. Localsearch took immediate steps to investigate and destroy all data associated with the unlisted number.

Localsearch will continue to remain in regular contact with this account holder to continue to support them and will provide an alternate number should they wish us to do so in the future.

In light of the recent departure of our previous Chief of Data and a new appointment into that role I have commissioned an audit into the integrity of our systems in so far as they relate to the importing and processing of the IPND update files. I have given our new head of data 21 days to report back to me with their findings and any additional recommendations they may have for ensuring the robustness of our systems.

I will revert back to you once I have reviewed their report.

Yours sincerely,



Catherine McGarry
Executive Director