

24 August 2022

Ms Catherine Douglas  
Crosby Textor Research Strategy Results Pty Ltd  
Governor Macquarie Tower  
Level 26, 1 Farrer Place  
SYDNEY NSW 2000

By email: [CDouglas@ctgroup.com](mailto:CDouglas@ctgroup.com)

ACMA file reference ACMA2018/1139-11

Dear Ms Douglas

**Telecommunications Regulations 2001 research authorisation**

I write regarding the research authorisation previously granted by the ACMA under the Telecommunications Regulations 2001 (Regulations) on 9 May 2019 covering:

- > Crosby Textor Research Strategies Results Pty Ltd (CT), and
- > Enterprise Marketing & Research Services Pty Ltd (EMRS).

As set out in our letter dated 9 May 2019, this authorisation formally commences on the date that Telstra Corporation Ltd (the Integrated Public Number Database (IPND) Manager) first discloses the authorised unlisted mobile number information to CT, and ends 12 months later.

The Regulations have the effect that an authorisation may stand indefinitely until the IPND Manager discloses the data to an authorised researcher. If this disclosure takes an extended period of time, it raises the risk that the basis on which an authorisation is granted may have changed and the applicant/s may no longer comply with the Regulations (for example, data security processes change etc).

In 2020, the ACMA put in place arrangements to mitigate against this risk and preserve the integrity of the scheme. This has involved the ACMA using its power under subsection 22(4) of the Regulations to specify an additional condition on all authorisations which ends the authorisation if it doesn't commence within a specified period.

This condition does not currently apply to the CT/EMRS authorisation which pre-dates these arrangements. We also have not been notified that the authorisation has commenced (noting researchers must notify the ACMA within 10 business days of receiving IPND data). In these circumstances, we are considering whether the ACMA should specify an additional condition on the CT/EMRS authorisation to the effect that it will cease within a specified period.

To assist the ACMA in its considerations, we would appreciate your advice on CT/EMRS' intentions regarding the existing authorisation.

We note it is open to CT to apply for research authorisations in the future, and that ending the current authorisation would not adversely impact the ACMA's assessment of any future applications.

If CT/EMRS seek to commence the authorisation within three months of this letter, we would seek your assurance that the practices, procedures, processes and systems outlined in the original application(s) to comply with all conditions of the authorisations remain the same.

We would appreciate a response by 2 September 2022.

The ACMA contact for this matter is Eve Osiowy, Manager, Numbers Section on [REDACTED] or at [eve.osiowy@acma.gov.au](mailto:eve.osiowy@acma.gov.au).

Yours sincerely

[REDACTED]

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