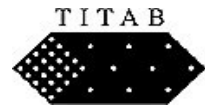




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(INCORPORATING TITAB AUSTRALIA)

Consumer Safeguards Review - Part C

Choice and Fairness: Consultation Paper

CITT and TITAB Response

September 2020



TITAB Australia Cabler Registry Service

TITAB (Telecommunications Industry Training Advisory Body) *Australia Cabler Registry Service* operates in the telecommunications and data sector as an industry based “not for profit” service and is an independently operating business unit of CITT (Communication & Information Technology Training).

Registering cablers working in customer premises on installation and service as an ACMA Nationally Accredited Registrar, TITAB also provides:

- technical advice on training and assessment in telecoms and IT to cablers; Registered Training Organisations; Retail Service Providers, carriers and government agencies
- as an industry service, also manages a national register of industry competency assessors and a list of RTOs delivering telecoms training
- TITAB also participates in commercial projects from time to time on training and assessment related issues.

Introduction

This submission addresses the issues raised in the *Consumer Safeguards Review Part C Choice and Fairness Consultation Paper* and follows the earlier Part A and Part B of the Review on complaints handling and redress schemes and the reliability of telecommunications services.

While Part A and Part B addressed in detail important components of the Consumer Safeguards Review our submission attempts to link some of the underpinning issues affecting outcomes for consumers in terms of quality of service, reliability and the overall impost of extra costs as a consequence of poor quality installation and servicing activities, in many instances.

The most recent ACMA Compliance Audits for the customer cabling sector have shown that there are around 35% of installations of customer premises equipment and cabling, that *do not meet mandated ACMA national technical standards*. Non-compliance to technical standards of telecommunications installations presents a service and safety risk to consumers, cablers and expensive telecommunications switching/network equipment and consumer devices. Security, fire, lift and medical alarms are of particular concern. This submission will demonstrate the link of customer’s installation quality to issues also raised in the earlier Part B review components.

Current legislative and regulatory framework

In general terms, the current legislative and regulatory framework is fit for purpose, but does require better monitoring and policing of regulations and quality standards at the “grass roots” level in many areas. As noted in the discussion paper there are two primary Acts and a number of legislative instruments made under these and via the Telecommunications Act in particular.

Covering a range of components of the telecommunications industry, they reflect the complexity of the industry where it networks the whole of Australia and provides transport links for voice and data in a modern telecommunications network to the world.

This submission attempts to supplement many of the key points in Part A and Part B with an emphasis on:

- service quality, security, integrity of the network

- costings, which in many instances are higher than desirable, simply because higher costs have been passed on to the consumer as a consequence of poor quality installation activity in the first instance.

Monitoring and policing does not have to be based on “black letter” interpretations. With a combination of actions, good outcomes can be achieved. Some practical activities include:-

- Raising awareness of mandated technical and safety standards for the customer premises installation and maintenance community;
- monitoring by ACMA with a fair but firm approach that advises individuals and companies involved in the industry on their shortcomings, but also applies sanctions and penalties for blatant breaches - of technical and consumer standards, for example;
- better training arrangements with improved links between trainers, government agencies and employers;
- a professional development/skills maintenance program approved by the regulator, ACMA and;
- recognising the link between customer service, pricing, complaints handling and the technical quality of equipment fundamentals such as cabling, terminal equipment

Industry standards

The role of ACMA is critical in the context of the Part C review and objectives. This submission notes the activities at what may be called the higher level of consumer safeguards, which in general terms is quite effective. However, the performance of ACMA at the technical monitoring and enforcement level, which as far as performance is concerned is just as critical as the higher order of activities and is not as effective for a range of reasons.

There have been a number of budget imposts on the technical regulation and compliance area of ACMA in particular, mainly because of government expectations as to annual productivity improvements and there have been consequent cuts to budgets based on a perception of productivity being improved. Regardless of productivity, rents, travel, utilities, salaries and other fixed costs go up and arbitrary percentage cuts to ACMA budgets do not reflect the reality of the performance situation and a reduction in “policing” is inevitable.

Priority Compliance Reviews conducted by ACMA in recent years show that there has been around a 35% non-compliance figure where mandated technical standards relating to safety and harms to individuals and for that matter the network, have been documented.

Poor quality installations have a ripple effect on quality of service to customers. Ultimately the safeguards being applied under the Act and regulations are more onerous, legally more complicated to enforce and costly than would be the case if the quality of installations of customer premises equipment and particularly customer cabling, were to national standards in the first instance.

In a major review conducted in 2017-18 by ACMA into the registration system for telecommunications and data cablers, virtually all of over 70 submissions from industry stakeholders requested more monitoring and compliance checks. They requested stronger application of ACMA powers to improve compliance levels to technical standards, which would bring about a number of flow on advantages for consumers and the nation.

Improvements to ACMA compliance monitoring would have a direct positive impact on reducing the number of past complaints, quality of service, cost to consumers, minimisation of harms to individuals and the network and overall less costly in a social context in the present arrangements.

Standards development is conducted by a committee arrangement primarily managed by Communications Alliance with a cross-section of industry stakeholders putting in a lot of effort over time to develop Australian

standards that are consistent as far as is possible with international requirements and the balancing of costs and benefits to Australians.

Technical standards underpin the performance of the network and if not enforced - and here a carrot and stick approach can be applied - lead to higher cost imposts directly to consumers and indirectly to Australia in a social context. Getting it right the first time is a golden rule of quality assurance!

Service provider rules

These appear to be functioning reasonably effectively.

Industry codes

Industry Codes can be an effective tool to improve performance. Comms Alliance has been effective in producing a number of industry codes that could be regarded as "high level". However, at the technical level of customer premises installation and maintenance activity, industry code development is not as advanced and to be practically effective needs the support and leadership of ACMA.

ACMA is well-positioned to manage a project involving all relevant stakeholders to develop a modern industry code for the installation and maintenance sector for customer premises equipment and cabling. The industry code for the sector applicable at the moment needs review and currently to conduct a review is extremely complex and expensive and without the leadership and assistance with project management of ACMA, presents extreme obstacles for the industry stakeholders.

KEY ISSUES

The changing communications environment

The changing communications environment has been a major factor affecting all aspects of performance in the telecommunications network and consequent consumer safeguards activities. In simple terms Australia went from a vertically integrated telco focussed on service with an emphasis on national requirements- PMG, Telecom Australia, Telstra - to a privatised telecommunications environment where no proper advance planning had been considered to cater for many of the significant consequential changes resulting from privatisation.

In the "monopoly" days recruitment, training, most performance monitoring, regulation of building cabling and implementation of service standards to meet government requirements were virtually all under one management structure.

While it was not perfect, it provided a technical workforce based on a salaried arrangement with minimum use of contractors (and Sub-Contractors) who generally were only used to meet peak demands or specialist skill requirements not available in the telco workforce.

Consequently, training was provided in a practical environment and directly linked to the needs of the Telco at the time and where projections could be made on future network growth and technical change, so adjustments could be made to the training and recruitment programs.



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That is not the case today and we now have a “competitive” and market place driven arrangement. With multiple Carriers, RSPs, the NBN and Apps providers, there are fewer salaried and retained skilled staff and the wide use of contractors and relatively untrained sub-contractors the system is fragmented. In today’s industry there are many sub- contractors including “Mum and Dad” companies recruited simply on a cost-cutting basis with little training or experience on telecommunications contracted to the task and not the (complete) job.

This has led to a reduction in many instances to service standards for customers. To some extent technology improvements have covered up problems with quality assurance and training quality for existing staff and new entrants. Ultimately, however, poor quality installation and maintenance of customer premises equipment leads to higher complaint numbers and consequent cost imposts to customers and to society. This will be exacerbated by the improvement in digital products and COVID19 pandemic changing the working environment, increase in small businesses and more workers encouraged to work from home offices.

The abolition of the monopoly for political purposes is understood. However, to get an installation completed in a small business, domestic household and even in some cases for larger businesses is now more complicated with more players involved than under the previous monopoly arrangement.

Telecommunications is in essence an essential “fourth utility” and needs to have relevant regulations applied more stringently as is the case for other utilities, gas, water and power at the state level. Telecommunications has been a national responsibility from Federation and this provides an opportunity for leadership from the Department and ACMA in bringing about a more cohesive industry with higher levels of technical compliance and consequent advantages. A seamless customer experience is desirable and the paper recognises that there are some difficulties with separate businesses delivering telecommunications.

Choice and fairness

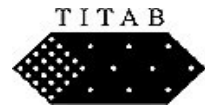
The three broad issues in relation to regulating choice and fairness in the relationship between customers, including small business, and their providers are very relevant and we make some very brief comments on each:

- **Customer service and satisfaction, including as evidenced by complaints to the TIO and complaints made directly to providers.** We would contend that the number of complaints linked to poor quality installations is higher than desirable and to some extent not as evident as some of the other service shortfalls are. Poor installation practices and sub-standard customer premises installations are hard to measure under the current “high level” arrangements. This comes back to the difficulties that ACMA have in monitoring and enforcing compliance to industry national technical standards.
- **The way in which consumer protection rules are made under the regulatory framework;** Overall, in a notional sense the current protection rules made under the regulatory framework is satisfactory. However, they do not drill down far enough to identify the shortfalls outlined in our submission
- **Compliance with an enforcement of those consumer protection rules.** As outlined in our paper, in general terms, measurement of compliance with enforcement of consumer protection rules is working but misses some of the more practical aspects of telecommunications installation and maintenance practices that ultimately affect detrimentally, consumer service



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Customer service and satisfaction

There is sufficient evidence in TIO, ACCC and other industry data to show that there is significant scope for improvement in customer service and satisfaction.

Making consumer protection rules

Self-regulation fails unless it is backed by a strong regulator with enforcement powers. Self-regulation has failed in all areas of public interest where there is a mix of public and private funding and a low level of enforcement and poor monitoring of standards. A monitoring and inspection regime backed by enforcement where there is deliberate avoidance of responsibilities, is essential.

These ingredients are lacking currently in the customer equipment installation and maintenance area which as stated earlier, impacts on consumers at virtually all levels; domestic, small and medium enterprises and also to commercial enterprises where there is usually a low level of “in-house” knowledge of telecommunications.

ACMA have sufficient legislative and regulating powers but these are not applied due to shortfalls of staff resources and a “softly, softly” “hands off” approach to regulation which has developed among management in recent times. It does not work!

Self-regulation

Comments in the earlier part of this submission are relevant to this item. It does not work without a strong regulator willing to apply enforcement when appropriate. In all the other areas where other utilities operate, there is a mix of individual or company registration, self-reporting, and field inspections, where individuals and enterprises are encouraged to apply relevant standards, but where enforcement can be applied where blatant breaches occur.

Among many issues, safety and occupational health standards must be front and centre for both the consumer and the worker – there is concern that self-regulations driven by low cost and “race to the bottom” will endanger customers, households, businesses and lives. Discussion with the insurance industry has highlighted the need for some regulations if it’s to keep their premium costs down.

Industry codes can assist with improving quality assurance and encourage enterprises and individuals to work towards better QA and application of standards designed to improve customer experience and prevent harms to individuals and the network and minimise the need for a regulator to intervene.

Direct regulation

Direct regulation works as has been demonstrated in many high-risk industries. However, in telecommunications as a national responsibility since Federation, during the time of the “monopoly” a balance was maintained over many years between service provision and customer satisfaction and potential harms. This was generally minimised by a well-trained and competent salaried workforce, where there was limited conflict-of-interest and competing forces between costs and service standards – today it’s about connections not quality throughput of services.



In the current political and economic environment it would be unrealistic to try and enforce a “black letter” regulatory regime. As stated earlier a mix of carrot and stick can work in the areas under discussion. The role of the ACCC and the TIO is vital in identifying market forces that are not working and require direct intervention such as demonstrated by the ACCC directions to RSPs and NBN on marketing material.

COMPLIANCE AND ENFORCEMENT

The enforcement process (telecommunications specific rules)

The two-step process for ACMA is generally effective even for most of the codes developed by Comms Alliance for example. However, to ensure compliance with national technical standards designed to protect both the consumer and the network technician and other “hands on” operatives, a stronger approach is needed.

Advice on education in the first instance, then monitoring, inspection and reporting and for ultimate enforcement where breaches continually occur, using a penalty system. It is important to have a quality workforce with current knowledge of digital skills and capability to serve customer complaints with the “one truck rollout” rather than contact centres escalating complaints that take days and/or weeks to service.

The compliance and enforcement experience

The consultation paper notes the ACMA reviews and the critical information summaries required by the TCP code. We would agree that the impact of ACMA’s compliance and enforcement actions appear to have been constrained by a number of factors, as listed in the consultation paper.

It is noted that there were situations where directions to comply and formal warnings were used to address non-compliance with self-attestation requirements. This principle should be expanded into the technical standards area and reinforce with a stronger inspection and monitoring process but with the ultimate threat of enforcement by penalties. It also is an indication that self-regulation has its limits.

LEGACY OBLIGATIONS FOR VOICE SERVICES

Although there have been significant changes to consumer habits with fixed line and mobile usage, there is still a need for protection to:-

- un-timed local calls,
- free access to emergency call services,
- provision of calling line identification,
- number portability,
- standard terms and conditions,
- operator services for reporting faults and service difficulties,
- directory assistance services and
- itemised billing.

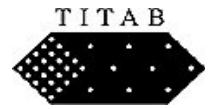
These are areas where direct regulation should be continued! We understand that preselection as a legacy obligation has probably been superseded but the others as listed are extremely important and should be maintained in the public interest.

As an aside, the Covid19 crisis has highlighted the risks with off-shoring of reporting and fault restoration. Some Telcos and other service companies have taken the decision to return operator serviced functions to Australia and



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this has been welcomed in the public domain. Difficulties with accents, standard talking points and a lack of local knowledge, have made fault reporting for example, extremely difficult for many Australians, particularly those with slight hearing impairments or English as a second language.

DIGITAL INCLUSION AND PRODUCTIVITY

As stated in the consultation paper, if choice and fairness are to be realised, essential communication services should always be available.

There will be variations in the community as to online skills and the digital divide may persist for some time. However, affordability has improved over time and supporting digital participation will be a responsibility of governments for some time.

TELSTRA LOW INCOME MEASURES

Current measures in place to assist low income groups are extremely important in the social context. There should be an examination as to whether these principles can be applied across to mobiles, broadband and other services.

As an observation, it could be argued that it is unfair for the legacy carrier, now a private company, to have to bear most of the responsibility for telecommunications access assistance to low income groups. Consideration should be given to expanding the principles and some costs to other carriers and RSP's.

WHAT CHANGES ARE REQUIRED?

Choice and Fairness

There needs to be a combination of direct regulation and “soft” regulation where a “carrot and stick” approach is taken, as recommended earlier in this paper. It is desirable that codes where applicable are developed as quickly as possible with as much input from stakeholders as practicable.

The legislative framework and rulemaking process are generally fit for purpose but the manner in which rules are enforced needs consideration. As stated earlier self-regulation as a public interest mechanism does not work.

Rule making

Clearly, the rulemaking process should be effective and appropriately consultative with clear targeted rules for both industry and consumers. Involvement of industry in development of rules and codes is a crucial element to get a desirable outcome.

Strengthening the self-regulatory framework would not in itself achieve the desired objectives. Allocation of “reserve powers” to the ACMA should be considered as outlined in the paper. ACMA would probably need extra resources to expand its role.

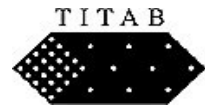
Rule coverage

While the rules can cover essential protections, focusing on provider behaviour where commercial and other market incentives for good service and fair treatment are lacking, the rules need not create unnecessary imposts for industry or interference with the market per se.



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We contend that there is a missing ingredient at the work place and consumer location level, where non-compliance with registration and nationally mandated technical standards, ultimately results in performance that is less than optimum and resulting in a high level of complaints to providers, ACCC and the TIO.

RULE ENFORCEMENT

Consumer protection rules should be directly enforceable

Consistent with principles expounded in earlier parts of this submission, we support the notion of ACMA being empowered to directly enforce compliance with codes, including by issuing infringement notices, seeking pecuniary penalties and accepting enforceable undertakings without having to first direct a provider to comply, in some more extreme circumstances.

ACMA should be intellectually equipped to be a decision-maker as ultimately they are accountable to the Minister and the public at large.

LEGACY OBLIGATIONS

Obligations of ongoing importance

Our comments earlier in this submission apply and the principle should be that public interest on certain specified telecommunications services, where there may not be strong commercial incentives, should be paramount.

Obligations potentially of declining relevance

There will always be a tendency to apply the new and discard the old. However, for telecommunications there needs to be a considerable time lag before some services are discarded. Although there is widespread use of mobile technology there is still a significant proportion of Australian adults who rely on a fixed line and legacy voice service.

Some carriers and RSP's bundle the local fixed line service with mobile, data and other services, however, the principle remains that there is a long-term community expectation that there will be a fixed line service. In some circumstances it is more reliable in times of emergency than mobiles and this should also be taken into consideration. Pre-selection on face value is probably no longer required.

Price controls on Telstra are a political matter, but it may be opportune to either drop the impositions on Telstra or expand them on a proportional basis to other providers.

PROPOSALS FOR REFORM

Proposal 1

Telecommunications specific consumer protection rules should cover essential matters between consumers (including small businesses) and their communication providers

We agree with Proposal 1. Principles 1 & 2 cover the situation adequately and new rules do not need to be developed. Rather we should make the existing rules work. The range of matters listed under the Act are a good starting point. There may be a need for some minor redesign, however, the consumer protection rules should go beyond the visible retail relationships.



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Regarding Principle 3 the current frameworks should be sufficient to improve on current arrangements. Widespread industry consultation would be needed as usual and should include some of the new players in the industry such as providers of the **apps** that grow almost daily and are in use by a wider cohort as time goes on, particularly by younger folk. **Third parties that provide apps to consumers must be captured to ensure that those that can least afford in costs in services are protected.**

Enterprises and individuals involved in actually physically providing cabling and customer premises equipment should be included in consultations as presently there is a tendency for a “high level” almost academic approach, that overlooks the contribution of the “hands-on” technical workforce and possible weaknesses in the supply chain. If there are failures at the customer equipment and cabling point it has a ripple effect right through the industry, impacting on costs and complaint reporting and needs to be properly regulated by ACMA.

Proposal 2

The telecommunications consumer protection rule-making process should be reformed to improve its effectiveness.

We agree with Proposal 2 and improvement in any rule is a desirable outcome. However, reform should be undertaken in a careful and considered manner and recognise the gains that have been made over time.

Regarding Principle 1 There is a need to strengthen the code-making process. There is a role for direct regulation in certain circumstances, however, industry codes backed by a willingness to enforce where serious breaches occur are effective. It is important for the consumer that the ACMA continue to use regulations, industry codes and a range of guidelines to maintain quality of service and protect consumers.

With Principle 2 Yes, the triggers for ACMA - more flexibility, testing for code registration, the period of time a code must be registered before deficiencies are remedied - should be strengthened and ACMA should be given the ability to request and/or register a code more readily than at present. That is, to make a standard where no code has been requested or an existing code found to be deficient.

There also appears to be a need for greater flexibility in the timeframes for code development. However, the development of essential consumer protection rules through direct regulation by ACMA or the Minister would also strengthen positive outcomes for consumer. However, as advocated earlier in this submission there is a need for ACMA to take a lead on development of an industry code or codes in the customer equipment and cabling area.

Poor compliance to national technical standards has already been identified in ACMA Reviews and industry codes under the auspices of the ACMA have been identified by many in the industry as a priority for consideration.

Regarding Principle 3, current compliance to mandate technical standards arrangements administered by ACMA have been identified as sub-optimum. The current ACMA compliance arrangements involving a high level of self-regulation and a hands off approach to inspections, auditing and monitoring and a total lack of enforcement of mandatory standards, has been identified in a number of ACMA reviews to be ineffective in today’s environment.

There are now a greater number of participants in an installation and maintenance process and supply chain, which in the past “monopoly days” were virtually all under one management stream and thus it was easier to identify where weaknesses existed and rectification action could be taken more readily.



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Provided the ACMA is adequately resourced it should not have constraints when ensuring industry standards are structured to provide consumer safeguards as part of the total objective of creating workable and acceptable industry standards.

Proposal 3

The essential telecommunications specific consumer protection rules should be mandatory and directly enforceable by ACMA and the enforcement options available should encourage compliance.

We agree with Proposal 3 and Principle 4 ACMA should be able to directly enforce telecommunications specific consumer protection rules. It is preferable that code compliance should be mandatory. Where a code is registered by ACMA a direction from ACMA to comply should be for a minimum time-period before formal infringement notices or pecuniary penalties are invoked. If there is too long a delay following a formal direction to comply this could be utilised by some more unscrupulous enterprises and individuals.

The current regulatory and enforcement tools should be re-assessed to see what improvements could be made to provide ACMA with extra powers. The current available civil penalty and infringement notice maximums appear to be appropriate, as long as they are adjusted to take account of inflation in accordance with normal practice for ACMA and other agencies penalty arrangements. Civil court action should be a last resort so the penalties need to be structured to be sufficient to encourage compliance, without resort to courts.

We do not agree with a risk-based approach to regulation, compliance and enforcement. That leaves it open to judgement by agencies or individuals. Consistent with the governments Regulator Performance Framework, ACMA could be an agile, timely and informed decision maker and take actions which are targeted and commensurate with the existing risk.

Proposal 4

The legacy obligations of declining relevance should be removed or adjusted as Telstra's legacy copper network is phased out.

Consumer protections need to remain in place otherwise in a commercial environment, consumers may have their interest discarded in the interests of company profits. In the list of legacy obligations, there are two that seem to stand out. One is the price control arrangements for Telstra which appear to be in conflict with allowing a private company - which Telstra is now although it is also a "fourth utility" - to operate in a market, where most of the other major players are foreign controlled or owned with virtually no effective price/profit controls in Australia.

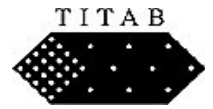
A level playing field should be a target for government and if that means there are advantages for Telstra then the foreign owned and controlled companies would still make commercial decisions as to their future. It is probable that they are often receiving some support/subsidy from their foreign owners anyway.

Telstra is a product of past investment by Australians so one could argue they should be allowed an advantage so long as it does not constitute a monopoly. The other players are large enough to offset any perceived monopoly and given there is now a separate wholesale network, the NBN, it is timely for more of those price controls to be removed. The second legacy provision of preselection is effectively redundant with the new technologies and packages available. Regarding mandating the services, experience indicates that they would probably be discontinued in the commercial market that exists today.



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Apart from the two mentioned above as being redundant there seems to be no need for any transitional or grandfathering arrangements for the balance. Telstra as a long-term Australian company should continue to provide low income measures in relation to fixed line phone services for the duration of its contract as the USO provider.

In the future it may be possible for a share arrangement whereby all the major Telcos carry some of the cost with the USO. Australia has a long egalitarian tradition and services should be available, accessible and affordable for all people in Australia. As has been demonstrated during the bush fire crisis, floods that followed and where cyclones cause devastation, telecommunications is a crucial fourth utility.

This has been further demonstrated in the Covid19 crisis and the ability of the Telcos and the NBN to service the community has enabled a significant part of the Australian workforce to continue working where otherwise they would have been stood down with consequent damage to the economy, well beyond what is already being experienced

General issues for comment

In response to the three items at the conclusion of the paper:-

- 1 The proposals in this paper address the major issues of concern around choice and fairness and consumer safeguards, as well as could be expected in the current vexed economic environment.
- 2 At this point we have not identified any unforeseen issues or been concerned about any unintended consequences of the proposals.
- 3 At this stage we have no suggestions on any other issues that should be brought to the government's attention.

In conclusion we should say that the opportunity to contribute to this consultation it process is welcome. Hopefully the inputs from the community at large will provide the basis for decisions that will be in the interests of Australia as a whole and consumers in particular.

For further information please contact [REDACTED] on [REDACTED] or [REDACTED] on [REDACTED].

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