



28 March 2013

Committee Secretariat
Standing Committee on Environment and Communications
PO Box 6100, Parliament House
Canberra ACT 2600

Commercial-in-confidence

By email: ec.sen@aph.gov.au

Attention: Committee Secretariat

Subject: Inquiry into feasibility of a prohibition on the charging of fees for an unlisted (silent) number service

Vodafone welcomes the opportunity to provide comment into the feasibility of a prohibition on charging fees for unlisted numbers. Vodafone has never charged customers for making a valid choice in either wanting their number to be made available through public number directories, nor in choosing to remain private and choosing to have their number unlisted.

It is curious that Telstra does not apply the charge for customers to keep their number private equally. Customers with a geographic number are charged and those with a mobile number are not. There can be no case for this discriminatory policy.

The purpose of the White Pages® in the past was to encourage use of the Telstra network and people to find each other for that purpose.

Accordingly, in times long past those who needed a 'silent' line with Telstra (then PMG/Telecom Australia) had to justify the need. Where justified, such as members of the law enforcement community, women seeking refuge and some categories of home workers the customer would be allowed to have a 'silent line' for an annual fee.

At that time additional work was required to ensure that 'silent lines' were 'protected', involving limiting access to such information and each year a team of people would validate the list of 'silent lines' against each release of a White Pages® directory to ensure that 'silent lines' were not accidentally included. The 'silent line' fee was justified on the basis of the additional effort that went into ensuring the privacy of this information.

In later years this policy was changed to commoditise privacy and allow anyone that requested a 'silent line' to apply for one. Since 1985 systems were changed to automate 'silent lines' as a product, which have come to be one of the key income streams for Telstra. Further systems changes (circa early 1990's) mean that there is no extra work required to maintain privacy of 'silent line' records and no extra validation of 'silent lines' against a forthcoming publication of a White Pages® was done.

The introduction of mobile phones saw a change in White Pages® policy whereby customers were originally charged for adding a mobile number to their White Pages® listing (classed as an Additional Entry at that time). After a couple of years this policy was changed such that mobile numbers could be listed free of charge, but no penalty 'silent line' fee would be applied for customers choosing not to list their mobile number.

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Telstra continues this inequitable arrangement to this day, to penalise those with 'local' service who choose not to be listed in a White Pages® directory because they choose privacy.

The reason the 'silent line' fee continues to exist is because it is in Telstra's commercial interests to retain this revenue stream and to discourage and penalise customers who choose not to be listed in White Pages® products allowing Telstra to make more money on its other commercial offerings that make use of White Pages® data.

Yours sincerely

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