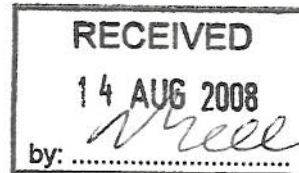


EXECUTIVE OFFICE



Australian  
Competition &  
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14 August 2008

Ms Belinda Neal MP  
Chair  
House Standing Committee on Communications  
PO Box 6021  
Parliament House  
Canberra ACT 2600

via email: [coms.reps@aph.gov.au](mailto:coms.reps@aph.gov.au)

Dear Ms Neal

**Inquiry into International Mobile Roaming**

Thank you for the invitation for the Australian Competition and Consumer Commission (ACCC) to provide a submission to the Standing Committee on Communications regarding international mobile roaming. I am pleased to provide the Committee with the ACCC's submission, which addresses the terms of reference and provides additional information.

I note that in the context of this inquiry we have sought roaming revenue information from some mobile network operators. Although the information request is voluntary, we expect that we may be provided with additional information relevant to the inquiry and we may seek your acquiescence to provide a further submission.

If you wish to discuss this further I can be contacted on (02) 6243 1124..

Yours sincerely

A handwritten signature in black ink, appearing to be 'Brian Cassidy'.

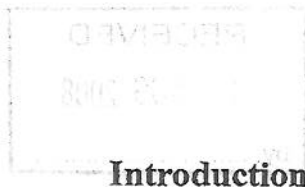
Brian Cassidy  
Chief Executive Officer



# **Australian Competition and Consumer Commission**

**Submission to the House of Representatives  
Standing Committee on Communications inquiry  
into international mobile roaming**

**August 2008**



## Introduction

The Australian Competition and Consumer Commission (the ACCC) is the independent statutory authority responsible for compliance with, and enforcement of, the *Trade Practices Act 1974* (the Act). The statutory object of Act is to enhance the welfare of Australians through the promotion of competition and fair trading and provision of consumer protection.

On 29 May 2008, Senator Conroy, Minister for Broadband, Communications and the Digital Economy, asked the House Standing Committee on Communications to inquire into and report on international mobile roaming (the Inquiry). The terms of reference for the Inquiry are:

- The extent to which retail international mobile roaming charges for both voice and data services reflect the underlying costs to operators of supplying the service.
- The adequacy of information available on Australian mobile operators' international mobile roaming costs and revenue in both retail and wholesale markets.
- The impact of new and emerging technologies and commercial initiatives that may reduce international mobile roaming charges for users or provide a substitute for international mobile roaming services.
- The adequacy of existing information from mobile operators available to consumers concerning international mobile roaming charges for users.

In September 2005, as part of its review of the regulation of Australian mobile services, the *Mobile Services Review*, the ACCC conducted an extensive examination of the provision of international roaming services and released a report *Mobile Services Review: International inter-carrier roaming*.

This submission informs the Committee of the findings from that review, updates information on current pricing and the availability and use of international mobile roaming services, and informs the Committee on current issues and trends in international mobile roaming.

The ACCC considers that the market for international roaming services remains largely unchanged with the relatively high cost for international mobile calls remaining so due to high wholesale prices, market rigidities and a lack of substitute services.

## **ACCC Mobile Services Review: International inter-carrier roaming (2005)**

In September 2005, as part of its review of the regulation of Australian mobile services, the ACCC conducted an extensive examination of the provision of international roaming services. It considered:

- whether regulation of international roaming services is appropriate under the *Trade Practices Act 1974* (the Act), and
- if so, what form regulation of these services should take.

The ACCC found that it did not consider it had the requisite jurisdiction to regulate international inter-carrier roaming services. It concluded that although there were a number of consumer protection measures it could adopt, the most practical way to overcome jurisdictional issues and address concerns over international roaming prices was through international liaison and co-operation with government bodies, regulatory agencies and multilateral institutions. The key findings of the report include:

- the ACCC did not appear to have jurisdiction to regulate international mobile roaming
- a declaration inquiry into the international roaming service was not appropriate
- the prices paid by consumers for international roaming services may substantially exceed the underlying cost of providing these services. However, a substantial component of the underlying cost was high wholesale charges levied by overseas mobile operators
- price controls are not the appropriate regulatory response as they do not address the underlying causes for competition being less than effective
- monitoring and publication of changes in average prices paid by Australian consumers for international roaming services may help improve consumer awareness and information, and
- it would not be practical for the ACCC to deal with a large number of individual overseas mobile network operators.

The report also found:

### *Components of the retail price for international roaming*

The retail price for the end-user of an international roaming service is the sum of the visited networks inter-operator tariff (IOT) charge, fluctuations in currency exchange rates and a mark-up over the visited network's charge. In general terms, and based on Telstra's publicly available information in 2005, the retail mark-up for outbound roaming services was thirty per cent. The ACCC estimated wholesale costs to be roughly seventy five per cent of the final retail price of an outbound roaming call.

### *Reasons underlying current prices for international roaming services*

The ACCC identified high wholesale rates charged by visited networks (in the form of the IOT) and the imperfect and limited range of product/service substitutes as reasons for the high mobile roaming retail prices. The ACCC, however, did not consider that there was a lack of consumer information available from mobile service providers and, did not consider mark-ups as indicators of operators engaging in anti-competitive pricing behaviour.

### *Developments in the markets in which international roaming services are provided*

The ACCC considered the following developments as factors likely to lead to greater consumer choice and more effective competition:

- pricing plans offering customers the same flat rate for each type of call irrespective of where the call was made from
- alliances between major mobile operators such as FreeMove and Starnap in Europe and the Bridge Mobile Alliance in the Asia-Pacific region, and
- more powerful SIM cards enabling mobile network operators to direct their subscribers' roaming connection and traffic to their partnered or preferred network.

### *Regulatory intervention and retail price controls*

The ACCC considered it inappropriate to hold a declaration inquiry, or take regulatory action, under Part XIC of the Act on the basis that:

- a) it was uncertain as to whether it had jurisdiction over the setting of wholesale prices by foreign mobile network operators or over telecommunications services provided by carriers established outside Australia, and
- b) regardless of the jurisdictional issue, it would be unlikely to be practical for it to separately seek to regulate the wholesale IOT rates set by the large number of foreign mobile network operators on whose networks Australian consumers could potentially roam while travelling overseas.

It was considered unlikely that retail price controls would address the underlying reasons for competition being less than effective and that retail price controls were not the appropriate regulatory response to consumer concerns about high prices of retail international roaming services.

### *Broader consumer protection measures*

The ACCC has not undertaken major enforcement action for a breach of Part V of the Act in relation to international roaming services despite receiving a number of complaints alleging conduct falling within the scope of section 52 of the Act. The ACCC did not reach a conclusive view in most cases due to the nature of disclaimers which stated that prices were indicative or subject to change without notice due to fluctuations in exchange rates. Whilst these broad-ranging disclaimers were of some

concern to the ACCC, they were not, of themselves, likely to be in breach of section 52 of the Act.

While it was considered that the ACCC could conduct a consumer information campaign under section 28 of the Act, the report noted the ACA's (now ACMA) responsibility for public information and education about telecommunications matters under section 6 of the *Australian Communications Authority Act 1999* and that the ACA had already provided an 'International Mobile Roaming' consumer fact sheet. The ACCC also proposed to work with the ACA in relation to government information. It did not recommend the development of an accreditation system for mobile network operators on the basis that it did not think it would result in significant consumer benefit.

The development of an industry code was not considered likely to significantly improve information already available to Australian consumers. The ACCC noted that an industry code on Customer Information on Prices, Terms and Conditions (ACIF C521:2004) already existed and that the ACMA had the power to direct the development of an industry code if necessary.

#### *Monitoring of changes in average retail prices for international roaming*

The ACCC was of the view that the monitoring and publication of changes in international roaming service prices could improve consumer awareness and assist regulators in relation to further regulatory responses should decreases in international roaming prices not occur over time. The ACCC considered discussing the feasibility of developing methods to measure changes in the average retail prices paid for international roaming services with Australian mobile network operators, but has not done so to date due to the probable complexity of this task and competing resourcing priorities.

#### *International co-ordination*

The report considered co-ordination with other regulatory agencies and multilateral groups as the most practical way in overcoming jurisdictional problems, identifying regulatory and enforcement actions and addressing concerns associated with high wholesale charges for international roaming services. The report listed the following overseas bodies as potential partners in bilateral and multilateral solutions:

- telecommunications regulatory counterparts, in particular, the New Zealand Commerce Commission, Ofcom (UK), and the Federal Communications Commission (USA)
- the European Commission's European Regulators Group (ERG)
- the Organisation for Economic Co-operation and Development (OECD), in particular, its divisions working on Competition or on Information and Communication Technologies, and
- the International Competition Network (ICN).

The ACCC concluded that developments in preferred-carrier bilateral arrangements, network selection technology, an increase in the number of substitute services and

flat-rate world zones may drive greater price competition between carriers and improve price transparency and simplicity for end-users.

## **International Roaming Regulation**

International mobile roaming has been under critical review by the European Commission (EC) since 2005. The issue of international roaming is more acute in Europe due to the geographical proximity of mobile networks and freer movements by travellers across national borders within Europe.

The EC Roaming Regulation introduced in June 2007 aimed to reduce roaming voice rates amongst European Union (EU) countries by mandating a 'Eurotariff' (a price ceiling on calls) and improving consumer information transparency. Mobile network operators and service providers within the EU are required to offer customers the Eurotariff for voice calls made and received when roaming in other member states. The main features of the EC roaming regulation include:

- *Eurotariff*: during the first year, making a regulated roaming call cannot cost more than €0.49 per minute and receiving one cannot cost more than €0.24 per minute (excluding VAT). The price ceilings will be further reduced on 30 August 2008 and 30 August 2009.
- *Wholesale charges capped*: prices that operators charge each other for regulated roaming calls (wholesale charges) are capped until 2010.
- *More transparency of roaming charges for consumers*: customers receive an SMS when they are crossing borders within the EU to inform them of the price they are expected to pay for making and receiving calls. Customers are able to request more detailed information by means of a voice call or an SMS.

The EC Roaming Regulation was reviewed by the EC in 2008<sup>1</sup>. The review sought comments on the efficacy of the existing regulation, but also sought input on whether additional regulation is necessary for data and SMS roaming services (at wholesale and/or retail levels) in light of current retail prices and market developments. The European Regulators Group (ERG) reported to the inquiry that:

- retail prices for voice mobile roaming calls in the EU have fallen up to 60 per cent but remain at the level of the regulated retail price cap or slightly below it (as a result of the regulation)
- the EU average price for sending a roaming text message is €0.29 and has not decreased for nearly a year. This is very high compared to actual costs of sending an SMS abroad varying from €0.04 to €0.08, and
- the EU average price for sending 1 megabyte of roaming data has fallen from €5.34 to €3.60 in one year.

As a response, the ERG recommended to the inquiry that voice roaming regulation should be extended beyond June 2010, retail and wholesale regulation for SMS

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<sup>1</sup> [European Commission – International roaming regulation public consultation \(2008\)](#)

roaming be implemented and that the data roaming market be monitored rather than regulated.

In addition to the review, the EC Commissioner responsible for Information Society and Media called on all mobile operators in Europe to bring down prices for SMS and data services or risk further regulatory intervention<sup>2</sup>.

#### *Roaming regulation in other regions*

International roaming regulation outside of Europe is virtually non-existent with no direct retail/wholesale price regulation occurring in any major market. In North Africa and the Middle East, there was recent agreement by the Arab Regulators' Network (AREGNET) that roaming charges should be harmonised across member countries, however, this is yet to be finalised and implemented.

The regulatory intervention in the EU has been aided by the institutional arrangements in place in the EU, the close proximity of member countries and commonality of regulatory structure provided by the EC. It would be difficult or impossible to replicate the EC international roaming regulation in other regions. Other regions do not exhibit the strong economic ties and common structural and political institutions that have developed over a number of years within the EU. Additionally, the single currency of EU is also a contributing factor.

#### **Bi-lateral regulatory cooperation**

It is unclear on what basis and in what regions multilateral or bilateral negotiations for the regulation of international mobile roaming services might progress within the Australian context. Whilst the ACCC may have some jurisdiction over inbound roaming services<sup>3</sup> it has little or no jurisdiction over outbound roaming calls.<sup>4</sup>

Even if the ACCC did have jurisdiction over the wholesale price setting behaviour of foreign mobile network operators, it would not be practical for it to separately seek to regulate the wholesale IOT rates set by the large number of foreign mobile network operators on whose networks Australian consumers could potentially roam while travelling overseas. Unilateral regulation at the wholesale level could also be counterproductive by discouraging commercial negotiation of wholesale rates and impeding efforts to improve bilateral inter-carrier commercial arrangements or multilateral regulatory outcomes.

There may be opportunities for Australia to explore bilateral regulatory cooperation with other countries to address concerns over international mobile roaming charges. This may include sharing of information regarding traffic data and volumes, co-

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<sup>2</sup> Vivien Reding: GSMA Mobile World Congress (11 February 2008)

<sup>3</sup> Inbound roaming refers to the situation where subscribers of foreign mobile network operators (the home network) visit Australia and roam on a domestic Australian mobile network (the visited network).

<sup>4</sup> Outbound roaming refers to the situation where subscribers of Australian mobile networks (the home network) travel overseas and roam on the network of a foreign mobile operator (the visited network).



ordinating regulatory inquiries and/or co-ordinating the application of regulation on a bi-lateral basis. The ACCC is currently in discussions with the New Zealand Commerce Commission in this regard, primarily to determine the extent, if any, to which regulatory cooperation might assist improving international roaming outcomes for residents of Australia and New Zealand.

Australia and New Zealand businesses have responsibilities under the Australia New Zealand Closer Economic Relations Trade Agreement (known as ANZCERTA or the CER Agreement) which may assist in promoting bilateral agreement between the two countries.

### **Destination/origin of travellers to/from Australia**

Whilst Europe, Asia and North America are key destinations for Australians travelling overseas New Zealand is the single largest country destination. Conversely, for visitors travelling to Australia, New Zealand is by far the largest country of origin. ABS and other data for 2007<sup>5</sup> show that:

- 47 per cent of Australians travelling overseas visit Asia,
- 21 per cent of Australians travelling overseas visit Europe (including the UK),
- 19 per cent of Australians travelling overseas visit New Zealand, and
- 12 per cent of Australians travelling overseas visit North America.

Of all Australian overseas travellers almost three quarters (74 per cent) are holidaying or visiting relatives while only 22 per cent travel for business purposes.

For travellers to Australia, ABS and other data for 2007 show that:

- 43 per cent of overseas visitors are from Asia,
- 25 per cent of overseas visitors are from Europe (including the UK),
- 21 per cent of overseas visitors are from New Zealand, and
- 11 per cent of overseas visitors are from North America.

Of all travellers entering Australia in 2007, 71 per cent are holidaying or visiting relatives while only 17 per cent travel to Australia for business purposes.

Market inquiries suggest that most non-business travellers are likely to try to avoid using international mobile roaming services and often seek to purchase a local destination pre-paid SIM card or pre-paid calling cards. The ACCC understands that business travellers are more intensive users of international roaming services.

### **‘Preferred carrier’ bilateral arrangements**

Since the *Mobile Services Review* the number of bilateral carrier arrangements entered into by Australian operators appears to have increased. This is in line with industry trends in other regions where mobile operators are seeking to establish bilateral agreements and inter-carrier alliances such as FreeMove (Europe), StarMap (Europe), Bridge (Asia) and Etilisat (Middle East). The ACCC notes that there have also been inter-alliance agreements such as those between FreeMove and Bridge.

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<sup>5</sup> Tourism Research Australia, Tourism Australia (various reports)

Hutchison (operating under the '3' brand) customers roaming on '3' networks in the UK, Hong Kong, Italy, Sweden, Austria, Denmark and Ireland receive benefits including free incoming calls and messages and similar rates for calls, video calls and messages to that in their home country. Standard roaming rates are charged when roaming on other networks. Rates differ depending on the charging zone to which a country belongs.

Optus is a member of Bridge Alliance, a partnership of eleven mobile operators<sup>6</sup> in the Asia Pacific region. Optus mobile customers roaming on a Bridge Alliance member network can use many services available on the home Optus network. In addition to its Bridge Alliance program, Optus offers twenty per cent off standard roaming rates for voice and video calls made and received on selected networks in some of its major destinations, such as SingTel in Singapore, HKCSL in Hong Kong, Vodafone in New Zealand and Orange and T-Mobile in the UK.

Telstra has commercially negotiated roaming agreements with numerous mobile operators in specific countries but has no special general discount or arrangement for any particular country, region or operator. Telstra international roaming call charges are based on call charges of the overseas carrier (or carriers, if country specific pricing applies) plus a surcharge (typically thirty per cent) and call zones (in the case of prepaid services).

Vodafone has roaming agreements with over 130 countries with pricing plans based on either geographic or non-geographic zones. Under Vodafone Traveller, pricing is determined by four geographical zones. Under Vodafone World, pricing is determined by five non-geographical zones. Extra discounts apply for customers choosing to roam on Vodafone Preferred Networks in each of the five zones.

A key benefit to consumers of bilateral arrangements is a reduction in price when roaming on carriers in countries covered by the agreements. Bilateral agreements also expand the range of countries where individuals may roam with a specific carrier and add to price certainty. They also reduce the need for specific carrier network selection, multiple SIM cards and the use of override codes. While there appear to be pricing and coverage benefits from the increased number of bilateral arrangements amongst carriers the charges continue to remain substantially above domestic pricing equivalents.

## **Revenues of Australian mobile network operators**

The ACCC has recently sought information on the volume of voice calls made, and revenue derived from, international mobile roaming services provided by Australian mobile network operators. The ACCC intends to collate information in order to obtain a more complete perspective on the size and scale of international roaming.

Subject to receiving revenue and usage data from Australian mobile network operators the ACCC may make a supplementary submission to the inquiry.

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<sup>6</sup>The operator members include Optus (Australia), Maxis (Malaysia), CSL (Hong Kong), Globe (Philippines), Airtel Bharti (India), SingTel (Singapore), Telkomsel (Indonesia), Taiwan Mobile (Taiwan), SK Telecom (South Korea), AIS (Thailand) and CTM (Macau).

## Pricing trends in international mobile roaming services

International roaming has both retail and wholesale levels. At the retail level, the provision of international roaming services consists of mobile network operators selling the service to end-users to allow these users to utilise services such as voice calls, voice messages, SMS, MMS and data services.

At the wholesale level, the provision of international roaming services consists of mobile network operators in different countries entering roaming agreements with each other to enable the provision of international roaming services in the retail market. As these agreements are bilateral arrangements and subject to negotiation between participating operators, there is no universal set of agreed terms and conditions for the provision of international roaming services.

In 2005, the *Mobile Services Review* examined the pricing of international mobile roaming services between Australia and the UK. It noted that wholesale charges are set by charging principles set by the GSM Association<sup>7</sup> (a global trade association representing the interests of GSM operators) through Standard International Roaming Agreements (STIRA) and based on the IOT<sup>8</sup>. The report noted that IOTs are often applied on a zonal basis. It found discounting of IOT tariffs is only slowly emerging.

The report also noted that retail prices were set by mobile operators, typically through a mark-up on the wholesale price. Unlike the domestic user pays system for charging mobile calls, the international mobile user also generally pays for incoming calls.

The report compared roamed and non-roamed mobile-to-mobile calls between Australia and other countries. Since that time prices for international roaming services remain extremely variable. For example, call rates for a five minute roaming call from the UK to Australia with Vodafone and Telstra appear to have remained steady while Optus has recorded a slight increase in price. It is noted that Telstra's per minute rate is generally lower than its competitors. When receiving calls from Australia in the UK, Vodafone and Telstra have reduced charges significantly while Optus rates have remained steady.

The ACCC has recently reviewed current consumer pricing for international mobile roaming services provided by Australian mobile network operators. There is no evidence of one carrier charging in excess of other operators. Comparing the rates for roaming in Australia with roaming in Germany, USA, the UK and Singapore, Australian rates to call the users' home country comes in at the lower end. In terms of Australian operators, only in Germany did call rates generally exceed those of operators from other countries.

Retail pricing schedules for international roaming services are complex and vary among mobile network operators. There are a number of pricing possibilities according to carrier, country of use and geographic region or zone. In addition, prices may vary according to monthly plan and volume of use.

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<sup>7</sup> A global trade association representing the interests of GSM operators.

<sup>8</sup> The IOT is a tariff between mobile network operators charged by the visited network operator to the home network operator for the use of the visited network.

The number and range of pricing options available make price comparisons and monitoring a complex and resource intensive task. Given the wide variety of pricing options available, that travellers often visit multiple countries and constant fluctuations in exchange rates (particularly for the settling of IOT s) monitoring may add to confusion amongst consumers when trying to compare prices of international roaming services.

While monitoring domestic mobile carriers' charges for outbound international roaming calls may be achievable, monitoring inbound call charges, given the large number of potential carriers supplying inbound calls, would be complex and time consuming. The ACCC considers that at this stage there would be little benefit in formal monitoring of prices.

## **Summary**

The ACCC's review of international inter-carrier mobile roaming conducted as part of its *Mobile Services Review* found that the prices paid by consumers for international mobile roaming exceeded the underlying cost of providing the service. This was largely due to high wholesale prices and market rigidities leading to high retail prices.

The ACCC considered at that time that direct regulation was unlikely to be effective and that preferred carrier bilateral arrangements, improved technology and a shift to flatter global pricing structures may improve price transparency and outcomes for consumers.

Whilst there have been some price reductions, the ACCC's optimism as to the potential for price reductions in the international mobile roaming market appears not to have been realised as increased competition has been slow to eventuate. Additionally, underlying market rigidities remain and the emergence of close substitute services has been slow.

The ACCC remains of the view that unilaterally regulating mobile roaming in Australia would be counterproductive and may impede efforts to improve bilateral inter-carrier commercial arrangements or improved multilateral regulatory outcomes.

Accordingly, the issue of international roaming might be referred to as an intractable problem, with little incentive for operators to engage in competition and jurisdictional issues hindering any unilateral initiatives. However, the ACCC is continuing to engage with the New Zealand Commerce Commission regarding the appropriateness of bilateral regulatory cooperation.

***The extent to which retail international mobile roaming charges for both voice and data services reflect the underlying costs to operators of supplying the service.***

Prices for international roaming calls (and other services like SMS) are higher than comparable non-roaming calls. These high prices can be attributed to both high wholesale prices for international roaming services and high retail mark-ups.

Price reductions due to bilateral agreements between mobile carriers have recently emerged but still appear to be limited to particular regions and to a few main carriers. The ACCC notes that some Australian mobile network operators have expanded the

range of bilateral roaming agreements that provide price reductions when roaming on related or preferred carrier networks overseas.

Further, the introduction of European price cap regulation may have increased wholesale rates for countries outside the EU as European carriers attempt to recover revenues lost due to the introduction of the Eurotariff (a waterbed effect).

Whilst there may be little incentive for mobile operators to reduce prices for international roaming services, ACCC market observations do not suggest there has been anti-competitive conduct within the scope of the Act. There have been few complaints to the ACCC by consumers regarding the adequacy and accuracy of information available to them in relation to international roaming services.

***The adequacy of information available on Australian mobile operators' international mobile roaming costs and revenue in both retail and wholesale markets.***

The ACCC does not collect information on Australian mobile operators' international mobile roaming costs and revenue for either retail or wholesale markets. To date, monitoring of mobile operators revenue and costs has not proved practical to introduce and the benefit of monitoring international roaming prices, either retail or wholesale, has not been established.

The ACCC has recently sought voluntary information from mobile network operators on the total revenue from, and usage of, international roaming services.

***The impact of new and emerging technologies and commercial initiatives that may reduce international mobile roaming charges for users or provide a substitute for international mobile roaming services.***

The ACCC notes that the impact of new technologies and the emergence of substitute services to international roaming services remains limited. This is likely due to the increased use of and utility found in multi-function mobile devices, with users appearing to value convenience above price.

Although substitute services, such as virtual mobile roaming, overseas mobile phone hire, international calling cards and overseas fixed phone services are readily available most are imperfect substitutes due to their inconvenience (number changes, acquisition of multiple services if visiting many countries and access to fixed line phones). Therefore, the ability of substitute services to constrain prices of mobile operators remains low.

***The adequacy of existing information from mobile operators available to consumers concerning international mobile roaming charges for users.***

Australian mobile operators in general appear to make available adequate information to consumers regarding the cost of mobile calls while travelling overseas. It is not clear that the provision of more detailed information on mobile roaming charges to consumers would provide significant benefits to consumers or assist in lowering prices.

The ACCC notes that there is an industry Telecommunications Consumer Protections Code<sup>9</sup> that deals with the provision of consumer information issues. Additionally, the ACCC notes that ACMA has the power to direct the development of a more specific industry code if necessary.

In addition, ACMA provides an 'International Mobile Roaming' consumer fact sheet (updated as recently as March 2008) as part of its responsibility for public information and education about telecommunications matters under section 8 of the *Australian Communications and Media Authority Act 2005*.

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<sup>9</sup> The Telecommunications Consumer Protections Code (C628:2007) – incorporates previous Customer Information on Prices, Terms and Conditions (ACIF C521:2004)