

28 November 2022

Brian Kirkpatrick
Technical Working Group
Data Standards Body

Dear Mr Kirkpatrick

RE: Decision Proposal 275 from the Data Standards Body Technical Working Group

Communications Alliance welcomes the opportunity to comment on Decision Proposal 275 from the Data Standards Body (DSB) Technical Working Group.

Decision Proposal 275 ('the proposal') summarises feedback on the draft telecommunications standards during the consultation process and seeks to define candidate API standard specifications.

The consolidated feedback from Communications Alliance members is below. If we have not explicitly commented on an item, it should not be taken as acceptance or approval, as we may still be considering what is proposed. We may wish to provide further feedback once the Rules have been finalised.

1. Overall feedback

Product Types

The proposal now suggests updating product types from 'Mobile and Broadband' to 'Mobile and Internet'.

In our view, this update does not provide any additional clarity. The two terms do not sit at an equivalent hierarchical level. 'Mobile' can (and usually does) provide internet connectivity. 'Mobile' can be data-only or voice and data. Internet could also be data-only, or voice and data.

It would be useful if the DSB could provide advice on the intended outcome. If the intended outcome is to identify how the service is utilised, then one option could be to specify 'data', or 'voice and data'.

Network Subtypes

The proposal notes DSB is evaluating whether specifying access network types for products will be beneficial. In our view, there is no real value in specifying access network types, as these can change during the life of the service. For example, an internet customer may move from FTTN to FTTP.

Industry does not define the network subtype for mobile customers as this can change constantly depending on what radio access technologies are available – for example, a customer may switch between 3G, 4G and 5G depending on location.

Service ID's

NBN services should always be identified using the 'Access Virtual Circuit Identifier'. This is a unique 15-digit number that represents the NBN Access Virtual Circuit, which identifies the unique Customer service.

This is consistent with arrangements in the Industry Code C647¹, which describes the processes between customers, retail service providers (RSPs), access seekers and access providers for the post-migration transfer of fibre access services over the NBN and seeks to minimise customer impacts during the transfer of an active NBN service between Retail Service Providers (RSPs).

Mobile services should be identified using the 10-digit mobile number.

2. Telco Endpoints Feedback

Sector name as 'telco'

We have no concerns with the sector name being 'telco'.

Account payment schedule

Prepaid mobile services do not have an account payment schedule, so it is unclear how they are captured. Prepaid mobile services do have an expiry which can vary from days to a year and most have an allowance or grace period thereafter, during which the service can be reinstated.

Account Concessions

It is not clear what 'account concessions' means or what it is meant to capture. Further guidance from DSB on this category would be useful.

Invoice data

Further to the above comment in 'Account payment schedule' about prepaid mobile services - prepaid services have no account payment schedule, and therefore no invoice data. Further guidance from DSB on whether these accounts should be captured – and, if so, how - would be welcomed.

3. Product Data Feedback

Billing Type

The proposal says 'as suggested and a new type "UPFRONT_PAID" for subscription style services'.

It is unclear what is meant by this, or what it is intended to capture. If it is intended to capture pre-paid mobile services, then these are not typically classified as subscription services, because there is no ongoing commitment and some forms of post-paid are subscriptions paid in advance. Further clarification from DSB would be useful.

4. Account Data Feedback

Authorised Contacts

The proposal notes DSB is awaiting confirmation on whether authorised contacts will be required in the standards. Our view is that authorised contacts are relevant, and we strongly support including authorised contacts in the telco standards.

¹ C647:2017 NBN Access Transfer: <https://www.commsalliance.com.au/Documents/all/codes/c647>

5. Invoice Data Feedback

Accounts/Services with no Invoices

The proposal notes that some accounts and services do not have invoices, but questions if such services have an account identifier.

Our advice from industry is that some prepaid accounts will have an account number, but others do not. We agree with the approach proposed by DSB.

6. Transactions Data Feedback

Voucher Top-ups

The proposal notes a new type has been added to the payment method to include vouchers. We agree with this approach.

7. Balance and Usage Feedback

Account Level versus Services Level Balances and Usage

The proposal questions whether to provide only account level usage and balances for some types of accounts where service level data is not available.

Our response is that usage data will not always be available. Not all services will have real-time billing data to provide usage and balance, and some charges may be reliant upon third parties to provide data which may not come in from other sources for some time - for example, international roaming.

If you have any questions with respect to this submission, please contact me on 0434 318 777.

Yours sincerely,



John Stanton
Chief Executive Officer
About Communications Alliance

Communications Alliance is the primary telecommunications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, equipment vendors, IT companies, consultants and business groups.

Its vision is to be the most influential association in Australian communications, co-operatively initiating programs that promote sustainable industry development, innovation and growth, while generating positive outcomes for customers and society. The prime mission of Communications Alliance is to create a co-operative stakeholder environment that allows the industry to take the lead on initiatives which grow the Australian communications industry, enhance the connectivity of all Australians and foster the highest standards of business behaviour.

For more details about Communications Alliance, see <http://www.commsalliance.com.au>.