

○ FROM PUBLIC SERVICE TO SERVICES TO THE PUBLIC

INVENTING TELECOMMUNICATIONS CONSUMERS

Holly Raiche, ISOC-AU

The paper opens with the PMG as provider of a service to the public. Against the backdrop of a more competitive regime, consumer participation in telecommunications develops with the establishment of TACC and CTN, and later, funding for consumer representation by the Government. With two issues – the consumer contracts code and mobile premium services issue, the strains on industry self-regulation and existing representations structures are evident. With the establishment of a new peak consumer body ACCAN, and renewed support from Government and the regulator, new understandings of the limits of industry self-regulation may be reached.

Collaboration in governance involves a recognition of interdependence across a network of institutional structures. It depends upon accepting mutuality of interest. It should not unthinkingly assume consensus. The parties will often come to the table with competing interests. Their different perspectives will only be resolved – indeed, they will only properly be understood – by honest interaction and genuine negotiation. (Shergold 2009, 148–9)

This is an (all too) brief narrative of the trip the public have taken in telecommunications. The trip begins with telecommunications as a public service, provided by the Postmaster General's Department (PMG). In that world, the Government decided what telecommunications service would be provided, to whom, and at what cost. The public's choice was the classic Henry Ford one – you can have any car you want as long as it is a black Model-T. With many services and service providers, it is now the public that makes the choices. What has also changed is consumers' dialogue with the providers of services.

Peter Shergold highlights one theme of that trip: the need for meaningful dialogue between all stakeholders, particularly in a competitive environment with diverging stakeholders' interests. But the trip is also about the limits – the limits of resources available to consumers as against industry. It is also about the limits of self-regulation in a competitive environment.

PMG AND THE PUBLIC

From Federation to 1975, telecommunications services were provided by the PMG. (Armstrong 1990, 1– 6, 29–30) In the 1950s and 1960s, there was one telephone for about ten people, with the national objective, that 'every householder had the opportunity to obtain a telephone at a fair cost' while maintaining a 'level, range and quality of telecommunications' which would 'permit Australian industry and commerce to remain internationally competitive'. (Davidson 1982 Report, Vol 1, clause 6)

The Telecommunications Act 1975 created a new Australian Telecommunications Commission (Telecom) and gave Telecom specific duties for the provision of services that 'best meet the social, industrial and commercial needs of the Australian people for telecommunications services' and,

so far as reasonably practicable to do so, 'make its telecommunications services available throughout Australia for all people who reasonably require those services' (Section 6). But there was no mention of how or even whether the public might be involved in that process.

As telecommunications provision moved from the PMG to Telecom, Telecom's National Telecommunications Planning unit published *Telecom 2000*, inviting the public to look to the 'capabilities and role of telecommunications in society' over the next 25 years. (*Telecom 2000*, p. iii). The report included a chapter on 'open planning' and how that might be incorporated into telecommunications policy making. It was seen as a way of increasing the involvement of the citizen, and recommended that Telecom '... actively support open planning processes and establish machinery to mediate between itself and communities of interest'. (*Telecom 2000*, p 13) As the Outcomes Report notes, more people responded to the chapter on open planning than on any other topic, and the idea of open planning was 'very well received'. (*Outcomes Report 1978*, 36)

The Telecom Board approved the Report's recommendations. Indeed, the Outcomes Report said that consultations were 'already underway' between the marketing area and people with disabilities to develop products to meet their specific needs, and that Telecom intended to identify as 'wide a range as possible' of likely interest groups for discussions. (*Outcomes Report 1978*, 45)

PRESSURES FOR CHANGE

By the 1980s, however, there were strong pressures to open Telecom's monopoly to competition. The pressures came from Australian businesses for a choice of better services, delivered more quickly and at lower prices (ATUG 2006, 2). Pressures for liberalisation were also on the international agenda. (See also Grant 2004, 2–3)

In 1981 a Committee of Inquiry recommended the liberalisation of telecommunications, including the unrestricted use and resale of Telecom capacity, and the establishment of independent networks, with interconnection permitted between leased networks and Telecom's public networks. (Davidson 1982 Report: Vol 1 2809). The recommendations were shelved, however, but pressures for change remained throughout the 1980s. (Grant 2004, 2–4)

BETWEEN MONOPOLY AND COMPETITION

The first stage of telecommunications liberalisation began with the *Telecommunication Act 1989*. Private networks and the provision of value added services were permitted and an independent regulator for telecommunications was established (AUSTEL) (Armstrong 1990). While the Government had intended that this first phase would last for some time before being reviewed, by 1990, the increasing indebtedness of AUSSAT meant that the planned review of telecommunications (Evans 1988,60) was brought forward. (Armstrong 1991, 3) and a new regulatory structure established in 1991.

The second phase of liberalisation began with the *Telecommunications Act 1991* and the Australian and Overseas Telecommunications Act 1991, and included the merger of Telecom with OTC, with Telecom/OTC awarded a general carrier licence and a mobile telecommunications services licence. AUSSAT was sold, with the successful bidder Optus awarded the second general carrier licence and public mobile telecommunications services licence. The third mobile licence

was awarded to Vodaphone in 1992. The duopoly of two general carriers – Telecom/OTC and Optus – would end on 30 June 1997. (Beazley 1990, 2–3; Grant 2004, 5–7)

VOICES ARE HEARD

At the start of liberalisation, there were no formal structures for consumer participation in telecommunications debates. The public was nevertheless vocal. In February 1988, the ALP Member for Adelaide resigned his seat. In the ensuing by-election for what was thought to be a safe seat, Telecom raised the possibility of introducing timed local calls. In a large swing against the ALP, the Liberal Party won the by-election. (Morsillo 2008, 3 and Campbell 2009 interview) The voters had spoken – and Telecom listened.

Telecom's Outcomes Report may have started Telecom's approach to its subscribers. But, in the view of Robin Brown, it was the results of the Adelaide by-election that sent a Telecom representative to call on Brown, then the Director of the Australian Federation of Consumer Organisations (AFCO), to discuss the establishment of a more formal structure for Telecom's consultation with consumers. (Brown 2009 interview)

By August 1988, the Interim Telecom Australia Consumer Council (TACC) held its first meeting, working through TACC objects, purpose and membership. The first formal meeting of the newly formed TACC was in June 1989, with its membership including representatives from AFCO, Disabled People International, Rural Telephone Subscribers, Australian Council of Social Services, National Country Women's Association, Telecom Action Group and the Communications Law Centre.

By September 1989, the Consumers' Telecommunications Network (CTN) was also established with funding from Telecom. It would operate largely as a secretariat to TACC, 'acting as a synthesis of consumer views for consumer representatives on TACC, liaising with Telecom on issues of consumer concern, and following up on consumer papers for TACC. CTN would also keep informed of telecommunications issues among consumer groups and hold an annual conference for CTN, TACC and Telecom Regional Consumer Council (TRCC) members. (Cutler 1989). The TRCCs were also established, having their inaugural meetings in February 1990.

Early on, however, CTN activities went beyond its secretariat role. In September 1990, CTN organised a public rally in Sydney against further deregulation of telecommunications and its likely impact on consumers (Kennedy 1990). Another major CTN campaign was held over the partial privatisation of Telstra. CTN joined other consumer and public interest groups in opposing the partial sale (and later, full sale) of Telstra both in its submission to a Senate Committee and in that Committee's public hearings on the issue. (CTN 1996; CTN 1997)

Optus also established its own Consumer Liaison Forum in 1995, with organisational membership representing people with disabilities, people from non-English speaking backgrounds, women, people from regional and rural Australia and financial counselors, with CTN an inaugural member. CTN was also invited to sit on the Telecommunications Advisory Panel, chaired by the Minister for Communications, Information and the Arts. (CTN 1995, 3)

FUNDING CONSUMER REPRESENTATION

From its inception, CTN was funded by Telecom (later Telstra). As time passed, CTN was able to obtain some funding from other sources including the Broadband Services Expert Group, the

Telstra Social and Policy Research fund and from AUSTEL, for work on their technical standards setting project (CTN 1995). However, the bulk of CTN funds still came from Telstra, and the Chairperson's Report in CTN's Annual Reports through 1997 always thanked Telecom (later Telstra) for the funding.

However, with full deregulation approaching in June 1997, Telstra was increasingly careful about the information it shared with CTN. In Campbell's view, by early 1997, CTN's relationship with Telstra was 'deteriorating'. Conditions on Telstra funding were reliant on CTN 'clearing public statements with Telstra', and CTN was either denied access to information, or it was provided on a 'commercial in confidence' basis. CTN was being 'compromised'. (Campbell 2009)

In early 1997, Telstra reviewed the role of the TACC and TRCCs in the post 1997 regime and decided that the secretariat function for TACC that had hitherto been provided by CTN would go to tender. CTN tendered for the work, but was not successful. Telstra's funding of CTN ceased at the end of December 1997.

For the latter part of 1997, CTN faced what Campbell recalls as 'a period of great uncertainty'. CTN was awarded two significant contracts: work on a codes and administration scheme for the Australian Communications Industry Forum (ACIF) and the development of proposals for technical standards to meet the needs of people with disabilities. CTN also undertook consultancy work for the Network Interworking Industry Forum (NIIF) (CTN 1998, 7–8). After December 1997, it no longer had a source of regular funding.

The *Telecommunications Act* 1997 became law by April 1997. With its clear statement of regulatory policy (see below) and provision for codes developed by industry, it was clear that consumers were intended to play a role in the code process. Indeed, the Act included provision for grants to fund consumer representation on consumer issues (section 593). However, towards the end of 1997, no action on awarding grants to consumer organisations appeared to be under way and time was running out, particularly for CTN.

Together with the ACIF Chair Greg Crew, the inaugural CEO of ACIF, Johanna Plante, lobbied the Department and the Minister for action on consumer funding. (Plante 2009 interview) Others, including CTN (Campbell 2009 interview) were also lobbying for the funding. Finally, ACIF Alert reported success. The 'Government had decided to provide such funding' and 'has included an allocation of approximately \$750,000 per annum' (ACIF Alert 1998, 1). The bulk of that funding (approximately \$300,000) funded CTN. Smaller sums were allocated to other consumer organisations such as SETEL and TEDICORE for their participation in telecommunications debates. Approximately \$200,000 was set aside for telecommunications consumer research.

OPEN COMPETITION AND CONSUMER PARTICIPATION

The *Telecommunications Act* 1997 opened up the provision of facilities and services, articulating the Government's intention that telecommunications would be regulated 'in a manner that promotes the greatest practicable use of industry self-regulation and does not impose undue financial and administrative burdens on participants in the Australian telecommunications industry; but does not compromise the effectiveness of regulation in achieving the objects in section 3. (Section 4) The 'main object' of the Act set out in section 3 is 'to provide a regulatory framework that promotes the long term interests of end-users of carriage services or of services provided by means

of carriage services and the efficiency and international competitiveness of the Australian telecommunications industry'.

The other relevant feature of the Act for this paper is the establishment of a regime for the development of industry codes of practice. Codes of practice developed under the Act could be 'registered' by the regulator and, if registered, could be enforced against members of the industry to whom the code applied. (Section 112) Under the Act, it was clear the codes were to address consumer issues which were listed as examples of code topics. (Section 113) And before registering a Code, the regulator must be sure that the public had been invited to make submissions on the Code and that the industry body developing the Code had given due consideration to all submissions received. (Section 117)

In the lead up to open competition, it was clear to AUSTEL and industry that arrangements needed to be put in place allowing new service providers to interconnect with networks. Thus, the Network Inter-working Industry Forum (NIIF) was established in 1996, with its first task, developing interconnection arrangements. (Horsley 2009 interview; Darling 2009 interview) The Telecommunications Bill 1995 also provided for the development of industry codes, so the NIIF also began discussions on a process for their development. The NIIF Codes Working Group developed Guidelines for Code Development: Draft for Public Comment, which were released for public comment. (Hill 1997, 87–88). After revision in light of comments made, they were ready for open competition on 1 July 1997.

It was the work of NIIF that laid the groundwork for the establishment of ACIF on 1 July 1997. It was the NIIF Guideline on Code development that became part of the forerunner of the ACIF Operating Manual, and part of the ACIF culture of an open forum for all stakeholders. The NIIF had established that the 'supply and demand sides of industry could sit down and address issues'. And it was that culture that founded ACIF. (Horsley 2009 interview)

Under ACIF's first Operating Manual, the Board would have representatives from carriers, carriage and content services providers, equipment vendors, industry associations, and consumer and user groups. It would have an Advisory Assembly that would meet three times a year, with all members able to attend and participate. It would have six Reference Panels¹, with oversight over their respective areas. And it would have Working Committees, tasked by Reference Panels to undertake specific tasks, viz, developing a code or standard. (ACIF 1997)

Working Committees were required 'to the greatest extent possible' to represent all relevant sectors of the industry. 'Appropriate notice' must be given to the establishment of a new Working Group such that ACIF members and non-members 'with an interest in the subject' had an opportunity to participate in the committee, ensuring that the committee 'represents the best available balance between different parties interested' in the Committee work. (ACIF 1997, Clauses 2.5.2–3) ACIF also provided funding to assist consumer participation in ACIF activities through funding of consumer accommodation, travel and personal assistance expenses where required.

In 1998, the Disability Advisory Body was established comprising representatives from a broad range of disability organisations. Its purpose was to ensure adequate and appropriate disability sector input into ACIF codes and Standards. From 1999 on, ACIF held annual Consumer Forums to encourage consumer participation in ACIF processes. Over its first five years, ACIF produced many codes, standards and technical specifications, including, codes on billing, credit

management, complaint handling, information on prices, terms and conditions, privacy and consumer contracts.

STRAINS ON CONSUMERS IN A COMPETITIVE ENVIRONMENT

As Plante observed in reviewing the first five years of ACIF:

...the potential for full or partial 'win-win' outcomes is pivotal to achieving consensus. Self-regulation clearly stands a better chance of succeeding in areas where benefits are mutual....(Plante 2002, 7)

The obverse is that, where industry sees detriment to itself in agreeing to self-regulatory processes and outcomes, consensus will be very difficult. The first major issue that tested the boundaries of self-regulation was consumer contracts. A few years later, when ACIF had become Communications Alliance (CA), the boundaries were tested again by mobile premium services.

Horsley has commented on the 'extreme difficulty' that consumer movement has faced after 1997 in competing with the very considerable resources available to the supply side. (Horsley 2009 interview). Another more concrete issue between ACIF and CTN was a difference over ACIF funding for CTN participation in ACIF standards process. But industry's refusal to develop a code on consumer contracts was 'the last straw' (Corbin 2009 interview).

The consumer contracts issue began with the Communications Law Centre publishing a research paper on unfair consumer contracts. (Communications Law Centre 2001) Consumer representatives on the ACIF Consumer Codes Reference Panel requested that a Code be developed and registered to address the issues raised. Industry representatives disagreed, and a voluntary guideline would be developed.

In November 2001, in a letter to the ACIF Chair, the CTN Chair withdrew from the ACIF Board and from participation in ACIF activities. In a further letter, of February 2002, CTN gave ACIF a 'log of claims' for CTN participation in ACIF activities. The list included abolition of the current Consumer Codes Reference Panel, establishment of a Consumer Council with equal numbers of supply and demand side representatives, with CTN acting as its Secretariat and managing its budget. And tellingly, all work on the consumer contracts guideline should cease and the issue be addressed afresh. (Campbell 2002)

Ultimately, after a year's monitoring of industry compliance with the consumer contracts guideline, and differences of opinion between the Australian Communications Authority (ACA) and consumers on industry compliance, the ACA formally directed ACIF to develop a Code on the issue, which was then developed and registered by the ACA. (Wilding 2005, 42)

For its part, ACIF did establish a Consumer Council within the year, although its structure was as an advisory body, structured along similar lines to that of the Disability Advisory Body and not as CTN had proposed. The purpose of the new Consumer Council was to provide additional consumer input into ACIF processes.

After a year of the new arrangements, Wilding acknowledged the 'gains made' in ACIF consumer code development processes through the use of an independent chair and equal numbers of supply and demand side representatives for working committees, and independent drafting. But, he noted, that relies 'on the good will of ACIF'. (Wilding 2005, 43)

Another outcome was that, in 2004, the ACA supported the development, by eight consumer groups², of a report called Consumer Driven Communications (CDC 2004) to enhance consumer participation in a self-regulatory environment. For Horsley, then a member of the ACA, the CDC project was in response to the difficulties consumer representative still faced, particularly the imbalance in resources available to consumers and industry. (Horsley 2009 interview)

In all, the Report contained 75 recommendations, including many about consultation processes. Key recommendations were that the ACA should develop a process to determine if consumer input had been adequate before a code was registered. Its Consumer Consultation Forum and community consultations should be expanded. ACIF should review the level of consumer representatives on its Board and Reference Panels. Working groups should have independent chairs and equal numbers of industry and consumer representatives. In addition, consumers should be adequately resourced by ACIF for participation and liaison in the development of codes and a forum should be held for all stakeholders before a Code is developed, and after public comments have been received. The Minister should establish a Ministerial Advisory Council and meet regularly with consumer representatives.

If the consumer contracts issue paved the way for more positive outcomes for consumer participation, the mobile premium services issue showed the limits of self-regulation, especially as the organisation overseeing it, ACIF, changed from a neutral forum to an industry organisation.

In September 2006, ACIF merged with the Service Providers Association and the Australia Voice over IP Association to become the Communications Alliance (CA). With the name change came a change in focus. The list of members in Communications Alliance no longer contains consumer or business user groups. There are no representatives of business or residential user groups on its Board. The very detailed rules about consumer/user representation on Reference Panels and Working Groups have been replaced. The current Operating Manual still requires that working committees represent all parties with a stake in or affected by the subject matter of the proposed Code or Standard'. (Communications Alliance 2007, 3). However, the Manual gives the CEO discretion to establish Advisory Groups, 'where appropriate', to 'facilitate the development of codes of technical standards'. (Communications Alliance 2007, 13) – which leaves open questions on the circumstances in which either a Working Group or Advisory Group will be established.

The current Operating Manual spells out CA's new structure that will transition from the earlier 'Reference Panel structure to a structure of industry expert groups, aligned with the 'de-layered' NGN model'. The focus will be more on 'NGN issues than on legacy issues' with two new groups proposed: an 'Equipment and Infrastructure Expert Group' and a 'Services and Applications Group'. (Communications Alliance 2007, 14) And CA will continue seeking more 'effective mechanisms for ensuring consumer engagement, participation and access to services' and will 'support' the development of the Australian Communications Consumer Action Network (ACCAN). (Communications Alliance 2008, 14). As ACCAN was being established in 2009, CA disbanded its Consumer and Disability Councils.

Mobile premium services (SMS/MMS) were introduced by the ACA on the 1900 number range on a 'trial' basis from September to December 2003, against consumer objections that no consumer protections had been put in place for the trial. During the course of the trial, the Telecommunications Industry Service Standards Council (TISSC) developed and almost completed

a code of practice that would have provided those consumer protections. However, less than two months after the trial's completion, carrier representatives that had been involved in the Code development withdrew their support, calling the Code 'too prescriptive and unwieldy'. (Goggin 2006, 3). Carrier representatives then developed the Mobile Premium Services Industry Scheme (MPSI Scheme), which would be run by CA and was approved by ACMA. For consumers involved in developing the TISSC Code, this was a breach of trust. TISSC Board member, Gerard Goggin, said:

For my own part, I was shocked and deeply disappointed by what has been for me at least an unprecedented breaking of the bonds of trust, cooperation and good faith that underlie collaboration among different sections of industry and community. So too were many others, not least the content service provider representatives. (Goggin 2006, 4)

The MPSI Scheme did not stop the rising number of consumer complaints about MPS services. The TIO's 2005/6 Annual Report notes that complaints about premium SMS charges were the 'stand out' billing issue, up from 1708 in 2004/5 to 5,890 in 2005/6. In the next year, when the TIO had agreed to handle escalated complaints under the MPSI Scheme, from December onwards, complaints had reached 8,036 possible breaches. By the 2007/8 TIO Annual Report, escalated complaints under the MPSI Scheme were up to 13,899.

For CTN, enough was enough. In the lead article of their Newsletter of June 2008, the CTN CEO put the industry on notice.

'...consumers have had enough of being ripped off because of industry bumbles and misleading practices relating to mobile premium services. In our opinion the inability of the industry to provide adequate consumer protection for consumers in this area shows a clear failure in self-regulation. The industry have had several years to get this right and clearly there are still many consumers who have paid for services they did not want and were not aware they had. (CTN 2008, 1)

In the end, CA submitted a Mobile Premium Services Code to ACMA for registration. ACMA registered the Code, but only as part of a larger 'strategy for protecting consumers of premium short message services (SMS)'. This ACMA package included

- an ACMA service provider determination that would legislatively mandate a number of specific protections, including a requirement that mobile carriers provide the option of barring premium SMS services on all plans by 1 July 2010, a requirement that all content providers are registered and that known 'rogue operators' to be deregistered;
- a coherent and comprehensive monitoring framework; and
- registration of a significantly improved industry-developed code that sets out detailed rules and procedures for a number of matters. (ACMA 2009)

The Minister welcomed ACMA's announcement. The mobile industry, he said, 'has been sent a clear message to purge misleading practices and improve consumer protection. ... Misleading

practices in the mobile industry will not be tolerated and providers must ensure better protection for consumers.' (Conroy 2009)

He was 'optimistic' that the measures would lead to 'enhanced levels of confidence for consumers when dealing with the industry.' He warned, however, that 'should problems arise in the future the Government will look to further strengthen the measures announced today'. (Conroy 2009)

The message was clear. The Code, developed under the industry self-regulatory regime, was not adequate. In the view of both the regulator and Government, the limits of self-regulation had been reached. The regulator, supported by Government, had stepped in to provide the additional consumer protections deemed necessary but which the industry had not been willing to agree to in a self-regulatory setting.

ACCAN

On 1 May 2008, Minister Conroy held a Stakeholder Forum on the establishment of a new consumer peak body that could better represent telecommunications consumers. Over the next few months, with strong Departmental support, a new consumer body, the Australian Communications Consumer Action Network (ACCAN), was formed, taking over the assets, liabilities and role of CTN. On the announcement of ACCAN's Board officers, the Minister 'welcomed' the new leadership:

Consumers are frustrated that their needs and complaints are not adequately recognised by telecommunications providers....ACCAN is an important development for consumers, who through this new group will have a more powerful voice and will be better represented in the establishment of frameworks for future service delivery. (Conroy 2008)

Within a year of the initial Stakeholder Forum, ACCAN had a constitution, a Board broadly representing the range of consumer interests, and a new CEO, [former Trade Practices Commissioner, Allan Asher]. In the May 2009 Budget, it was announced that ACCAN would receive more than \$8 million over four years.

CONCLUSION – OR QUESTION

The regulatory policy of the Telecommunications Act states Parliament's intention that the industry be regulated in a way that promotes the 'greatest practicable use of industry self-regulation'. With a new, generously resourced peak telecommunications consumer organisation, and a regulator and Government now more willing to intervene where self-regulation is seen to be failing, the issue is what new balance will be struck between industry, government, regulators and consumers in developing and regulating consumer protection in telecommunications.

INTERVIEWS

Brown, Robin (former Director Australian Federation of Consumer Organisations) 13 July 2009.

Campbell, Helen (former Co-ordinator of CTN) 21 July 2009.

Corbin, Teresa (former CEO of CTN and Deputy CEO ACCAN) 27 July 2009.

Horsley, Allan, (Former Member, Australian Communications Authority) 27 July 2009.
Plante, Johanna (former CEO ACIF) 21 July 2009.

ENDNOTES

- ¹ Cabling, Network, Customer Equipment and Cable, Operations, Consumer and Radio and Environment.
- ² CTN, Australian Consumers Association; Communications Law Centre; Council on the Ageing (COTA) National Seniors; Telecommunications and Disability Consumer Small Enterprise Telecommunications Centre (SETEL); and Legal Aid Queensland.

REFERENCES

- Australian Communications Industry Forum (ACIF) (1 August 1997), *Operating Manual, Phase One*.
Australian Communications Industry Forum (1998) *ACIF ALERT*, Winter.
Australian Communications and Media Authority (ACMA)(2009) Media Release 56/2009 18 May 2009
ACMA announces new approach to regulating mobile premium services.
Armstrong, Mark, Ed (1990) *Telecommunications Law Australian Perspectives*, Media Arm Pty Ltd.
Armstrong, Mark (1991) Introduction, in *New Telecommunications Laws: The 1991 Revolution*, Proceedings of a CIRCIT Conference.
Australian Telecommunications Users Group (ATUG), (2006) *A History of ATUG 1981–2006: Celebrating 25 Years of Competition and Innovation in Telecommunications*.
Beazley, Kim C, MP, Minister for Transport and Communications (1990) *Micro-Economic Reform: Progress Telecommunications*.
Campbell, Helen (2002) Letter to Johanna Plante, dated 11 February 2002.
Australian Communications Authority (2004) (CDC Report) *Consumer Driven Communications: Strategies for Better Representation*, Final Report, December.
Communications Alliance (2007), *Operating Manual for the Development of Industry Codes, Standards and Supplementary Documents and the Establishment and Operation of Advisory Groups*, June.
Communications Alliance (2008), *Communications Alliance: The Year in Review: 2008*.
Communications Law Centre (2001) *Unfair Practices and Telecommunications Consumers*, Communications Law Centre.
Conroy, Senator Stephen, Minister for Broadband, Communications and the Digital Economy (18 December 2008) Media Release: *Minister Welcomes New Telecommunications Consumer Leadership Group*.
Conroy, Senator Stephen, Minister for Broadband, Communications and the Digital Economy (18 May 2009) Media Release: *Combating misleading mobile phone practices*.
Consumers' Telecommunications Network 1995. Annual report 1994/95.
Consumers' Telecommunications Network 1996. Annual report 1995/96.
Consumers' Telecommunications Network 1997. Annual report 1996/97.
Consumers' Telecommunications Network 1998. Annual report 1997/98.
Consumers' Telecommunications Network (CTN) (June 2008) Newsletter.
Consumers' Telecommunications Network (1992/3 through 2005/06) Annual Reports.
Cutler, Dr Terry (22 September 1989) Letter to Robin Brown, Director of the Australian Federation of Consumer Organisations.
Report of the Committee of Inquiry into Telecommunications Services in Australia, Volume 1, (1982) Australian Government Publishing Service (Chair J. A. Davidson) (the Davidson Report).
Evans, G (1988) *Australian Telecommunications Services: A New Framework: Statement by the Minister for Transport and Communications*, Australian Government Publishing Service.

- Goggin, Gerard (2006) "What Ever Happened to Consumer Protection in Mobile Premium Services", paper presented by the Consumers' Telecommunications Network Conference, 29–30 March 2006.
- Grant, Alasdair, ed (2004) 3rd edition, *Australian Telecommunications Regulation*, UNSW Press Ltd.
- Hill, Ruth, (1997) *Deregulation and Public Participation: The Case Study of Australian Telecommunications Policy: A Research report submitted in partial fulfillment of the requirement of the award of the degree of Bachelor of Information and Communications Technology*, University of Wollongong.
- Fiona Kennedy, 'Timed Calls "a Certainty" ' The Australian 14 September 1990.
- Morsillo, Robert (2008) *Transforming Consumer Representation in Australian Communications*, Paper presented at the Communications Policy Research Forum, Sydney, September 2008.
- Australian Telecommunications Commission, National Telecommunications Planning (NTP) (1978) *Outcomes from the Telecom 2000 Report*, Australian Government Publishing Service, Melbourne. (Outcomes Report).
- Plante, Johanna (2002) The Australian Communications Industry Forum (ACIF) Looking Forward and Looking Back, *Telecommunications Journal of Australia* Vol 52 No 2 pp 108.
- Shergold, Peter. (2009) "Been there, Done that, still hoping for more" *Griffith Review: Participation Society*, Editor Julianne Schultz, (Winter No. 24) p 141–155.
- Australian Telecommunications Commission, National Telecommunications Planning (NTP) Branch Planning Directorate (1975) *Telecom 2000: an exploration of the long-term development of telecommunications in Australia*, Australian Government Publishing Service, Melbourne (Telecom 2000).
- Wilding, Derek 2005. 'In The Shadow of the Pyramid: Consumers in Communications Self-Regulation'. *Telecommunications Journal of Australia* 5 (2) (Winter): 37–57.

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