

30 November 2021

By email: julian.leeser.mp@aph.gov.au

Julian Leeser MP
Federal Member for Berowra
PO Box 743
Pennant Hills NSW 1715

Dear Mr Leeser

Telecommunications Reform Bill

Consumer Action Law Centre (**Consumer Action**) welcomes the announcement of the *Telecommunications Reform (Telstra, NBN and Other Providers) Bill 2021 – Exposure Draft* (the **Private Members Bill**) to reform the telecommunications sector and improve consumer protections across the industry.

Telecommunications services are essential services – but are not regulated as such despite their critical role across the country. We appreciate the opportunity to comment on this plan to reform an industry that currently operates in a regulatory framework that is not suitable for the twenty-first century.

Consumer Action is an independent, not-for profit consumer organisation with deep expertise in consumer and consumer credit laws, policy and direct knowledge of people's experience of modern markets. We work for a just marketplace, where people have power and business plays fair. We make life easier for people experiencing vulnerability and disadvantage in Australia, through financial counselling, legal advice, legal representation, policy work and campaigns. Based in Melbourne, our direct services assist Victorians and our advocacy supports a just marketplace for all Australians.

As a community legal centre based in Victoria, Consumer Action regularly receives calls to our legal advice lines and to our financial counsellors operating on the National Debt Helpline from people experiencing issues with their telecommunications providers. Many of these issues relate to unacceptable sales, hardship and customer service practices common to the sector. We regularly see examples of these practices creating or compounding financial distress, often for people already experiencing vulnerable circumstances, resulting in digital, social and economic exclusion in Australia.

We have commented on the Private Members Bill based off our experiences and systemic issues highlighted through our advice lines and casework.

A summary of recommendations is available at the end of this document.

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Introduction

1. The telecommunications industry, and the regulatory framework that guides it, is in dire need of an upgrade. Customer service is abysmal, with sales targets and commissions (rather than ongoing service assistance) seemingly the driving force of an industry that provides an essential service in Australia. The COVID-19 pandemic clearly accentuated the necessity of mobile and data services for access to work, school, health, community engagement, COVID-19 'check ins' and government services; however, this societal reliance is not new. For too long, the telecommunications industry has been accountable to very low standards because it is largely responsible for writing and determining its own consumer protection rules, particularly the Telecommunications Consumer Protection Code (**TCP Code**).
2. Better, modernised regulation of the telecommunications industry is necessary to better match the need that telecommunications services provide in the community. It is essential that the regulatory framework is directly enforceable by the Australian Communications and Media Authority (**ACMA**), rather than the current two-step compliance and enforcement system. The current situation results in ACMA needing to undertake inefficient, repetitive investigations of the same systemic issue prior to being able to apply any effective enforcement tool. It is an ineffective setup for the regulation of an essential service.

Schedule 1 - Definitions

Telecommunications Company

3. We generally support the definition of 'telecommunications company' in the Bill, including in respect of the executive accountability requirements. For too long, telecommunications carriage service providers have flown 'under the radar', with no obligation to be licensed. The regulator, ACMA, is only able to direct a provider to join the Telecommunications Industry Ombudsman ('**TIO**') dispute resolution body once it becomes known that rogue telecommunications services are being sold. It beggars belief that telecommunications service providers currently have no obligation for licensing, thereby removing any ability for the regulator to impose conditions or to remove licences as an effective repercussion for unlawful conduct or conduct not in keeping with consumer protections.

Schedule 2 – Mobile services

4. Consumer Action does not have expertise on the technicalities of mobile service coverage or the feasibility of a mobile universal service obligation; therefore, we will not respond to this section directly. However, it is clear that telecommunications services, including mobile and internet services, are essential services. The COVID-19 emergency and related remote work, remote access to services such as Centrelink and telehealth, and remote schooling has confirmed the integral role telecommunications services play for a functioning society. It is time for the regulatory framework for telecommunications services to match community expectations of the consumer protections, compliance and enforcement intrinsic to the proper functioning of essential services.
5. Furthermore, in relation to misleading or deceptive conduct, which is referenced in the Bill: Consumer Action notes the misleading sales tactics of telcos found in the last two years, particularly in relation to the Federal Court action *ACCC v Telstra*¹ for unconscionable conduct, which included mis-labelling products as 'free' when selling to Aboriginal and/or Torres Strait Islander peoples in northern and central Australia.

¹ [2021] FCA 502, see: ACCC, "Telstra to pay \$50m penalty for unconscionable sales to Indigenous consumers" (media release, 13 May 2021), available at: [Telstra to pay \\$50m penalty for unconscionable sales to Indigenous consumers | ACCC](#).

Furthermore, the TIO found in its 2021 updated report on mis-selling that *multiple* telcos offered 'free' products and 'gifts' to customers in the sales process for which they later charged those customers.²

6. At Consumer Action, we have seen similar offers of 'free' products that, in fact, came with unaffordable service contracts through our own casework. In a recent survey of Aboriginal and/or Torres Strait Islander people from Victoria, thus far completed by 45 people, we found:
 - 26% of respondents said they had been sold extra mobile phones, tablets, pay TV or phone accessories for themselves or additional family members that they did not need by a telecommunications provider.
 - 22% said they had had their internet or mobile phone plan disconnected or restricted since March 2020
 - 20% had sought a payday loan to pay their telecommunications bill.
 - 26% of respondents had been unable to arrange an affordable payment plan with their telecommunications provider, despite being in financial hardship.
7. Issues caused by unaffordable, mis-sold telecommunications services and products proliferate the experience of consumer advocates. Unfortunately, this is not surprising, considering that an essential service industry, dominated by a sales culture of commissions and targets at the expense of its customers, is responsible for writing its own rules.
8. Self-regulation of the telco sector via the Telecommunications Consumer Protections Code has clearly failed to deliver good outcomes.
9. Modernising telco regulation that is directly enforceable through the regulator, thereby changing this essential service sector to one in which the regulator 'has teeth', should help to reduce the seemingly normalised culture of misleading and other unacceptable sales tactics rife in this industry. This would also reduce some of the other customer service problems that occur because of these tactics.

RECOMMENDATION 1. Consider requiring telecommunications companies to remove or reduce staff remuneration that incentivises sales over customer services (for example, sales commissions).

RECOMMENDATION 2. Telecommunications companies should be required to properly check whether a customer can afford a service or device before selling it, including checking income and expenses.

Schedule 3 – Customer service

Customer service

10. Consumer Action supports the limit on call waiting time for as set out in section 115B. Australian Communications Consumer Action Network (**ACCAN**) research released in 2020 found an average of 13 – 65 minute wait times³ for consumers attempting to contact their telecommunications provider through the phone (data was collected prior to the COVID-19 emergency which caused greater disruption in wait times). ACCAN reported the average cost to a consumer for this contact at \$15 to \$18, not insignificant, particularly for people experiencing financial disadvantage.
11. Furthermore, the Consumer Policy Research Centre (**CPRC**) recently released data collected during the COVID-19 emergency that showed telecommunication providers ranked equal last position compared to

² TIO, "Helping telco consumers sign up to the right phone and internet products" (Report, 17 May 2021) p4, available at: [Helping telco consumers sign up to the right phone and internet products | The Telecommunications Industry Ombudsman](#).

³ ACCAN, "Still waiting... the cost of customer service" (Media release, 16 Dec 2020) available at: [Still Waiting ... the cost of customer service \(accan.org.au\)](#); and Colmar Brunton, "Still Waiting... Costing wait times for telecommunications consumers", (Report commissioned by ACCAN, 12 Nov 2020), available at: [Still Waiting...Costing Wait Times for Telecommunications Consumers \(accan.org.au\)](#)

other essential service markets for overall consumer experience. The findings included telecommunications service providers were rated poorly for 'user experience and accessibility', 'proactive support' (such as financial hardship), and 'helpful advice and customer experience'.⁴ This data is reflected in our report showcasing the woeful consumer experiences of telecommunications conduct during the COVID-19 emergency, [The Trouble with Telcos: Stories from 2020](#).⁵

12. In related customer service woes in the telecommunications industry, Consumer Action lawyers, financial counsellors and our clients have directly experienced poor customer service and wait times, including time spent:
 - waiting for responses to hardship requests;
 - waiting for responses or any acknowledgement to complaints or legal disputes raised; and
 - waiting for telecommunications companies to provide relevant documentation required to resolve a dispute.
13. These delays, which we have seen last months or longer, cause immense stress to people who are living without the telecommunications services they need or as they continue to be charged for unaffordable services. When work, health, school and communication with friends and loved ones are put on hold because of delays, the isolating and negative effects on peoples' lives are exponential. While there are requirements for resolution of a complaint set out in a Complaints Handling Standard, our experience is that telecommunications companies regularly do not follow the spirit of this requirement, whether by refusing to accept authority to act documents from professional advocates or by providing only part or no documentation when requested.
14. In relation to financial hardship specifically, which is an increasing problem as telecommunications connections are prioritised over housing costs and food, we have seen the industry apply the current financial hardship provisions of the TCP Code in the inappropriate and unhelpful ways. We are regularly informed by our clients that they were unable to access an affordable payment plan for their telco bills, with clients stating they've been asked to pay hundreds on a fortnightly basis despite their inability to do so. We have also heard from clients that their services were simply 'cut off' rather than being offered

Case Study – Charlotte's story

Charlotte (name changed) contacted the National Debt Helpline in late 2020 after she had been unexpectedly cut off by her telco, with \$250 in arrears owing.

Charlotte is a victim survivor of family violence. She experienced homelessness earlier in the year due to the family violence she experienced and was living on her own with income from Centrelink at the time of contacting the National Debt Helpline.

Charlotte told us that due to her service being cut, it was hard to get into contact with her telco. When she attempted, she was sent into a self-service option, unable to speak to someone. Charlotte was experiencing financial hardship but said that no repayment plan or hardship was offered. In order to get reconnected, she had to pay over the phone – she used the money she had planned to use for rent. She then had to borrow money from her friends to cover her rent payment, which was also in arrears.

Our financial counsellor discussed support options and the Telecommunications Industry Ombudsman with Charlotte.

⁴ CPRC, "Sector Scorecard" (21 Sep 2021) available at: [Consumer insights series: Sector Scorecard - CPRC](#).

⁵ Consumer Action Law Centre, "The Trouble with Telcos: Stories from 2020" (November 2020), available at: <https://consumeraction.org.au/report-the-trouble-with-telcos-stories-from-2020/>.

appropriate, affordable hardship, barring them from accessing telehealth services, remote learning and work.

15. The ineffectiveness of hardship assistance is exacerbated by products being unaffordable at the point of sale. The problem is, however, that the requirements of telcos to consider affordability in the sale of products and to respond effectively to hardship are weak because of the self-regulated nature of the TCP and the inability of the regulator to directly enforce standards.

RECOMMENDATION 3. Consider broadening the customer service 'wait time' obligations to include such other common practices when dealing with the telecommunications industry, such as waiting for a response to a complaint or dispute, or waiting for relevant documents to be provided.

RECOMMENDATION 4. Telecommunications companies should be incentivised and required to proactively offer affordable payment plans for customers in financial hardship.

RECOMMENDATION 5. Telecommunications companies should be required to investigate and identify whether mis-selling has occurred in breach of its obligations when a customer has difficulty making payments, and take appropriate action where this is found (e.g. debt waivers).

RECOMMENDATION 6. Disconnection, restriction or suspension of this essential service is not an appropriate response to hardship unless that reduction in service is specifically requested by the customer to reduce their bills.

Case Study – Ulka's story

Ulka (name changed) called the National Debt Helpline (NDH) in September 2020 during Melbourne's Stage 4 COVID-19 lockdown. This is what she told us:

Ulka lives in metropolitan Melbourne. She has been experiencing mental ill-health and is pregnant. She is currently living on the Youth Allowance and COVID supplement.

In July 2019, Ulka signed up to a major telco provider for mobile service and a handset on a 36-month contract, for approximately \$115 per month (including monthly warranty costs). She was working full time at that time.

Ulka said she tried to call her doctor for some test results before contacting the NDH, but she couldn't make any outbound calls. She contacted her provider and found out her service had been restricted. When she advised the provider that she was out of work and was pregnant, and needed to be able to call the doctor, the customer service representative told her she would need to pay her nearly \$1000 phone debt in full to remove the restriction on her phone service.

Ulka said she couldn't afford the debt but was willing to go on a fortnightly payment plan. The provider rejected this offer. She had to ring the provider back (and re-tell her story) a number of times as she said they kept hanging up on her.

Ulka said she was very upset so decided she wanted to cancel her service with the provider. She was advised that if she cancelled, she would have to pay out the handset and her current debt. The provider referred her to the NDH, but said her service would soon be cancelled.

Ulka told us she was feeling overwhelmed and could not pay the phone bill and pay rent. She said she may end up homeless.

After speaking with our NDH financial counsellor who has referred her to our solicitors, Ulka spoke to her telco provider again and mentioned that she would be getting legal advice.

Schedule 4 – Executive accountability regime

16. Despite providing a service that is essential for everyday participation in Australian society, the pervasive culture of the telecommunications industry has been profit driven,⁶ with the minor consequences of non-compliance with existing rules simply seen as a cost of doing business. The effects of this culture were publicly confirmed with the *ACCC v Telstra* [2021]⁷ court action. But we know, through our casework and advice lines, that this type of conduct permeates the industry. The system is broken.
17. Therefore, we support the intent of the executive accountability regime recommended in this Bill. Similar to the Banking Executive Accountability Regime (**BEAR**) regime in the financial services sector, these standards would help to overhaul the culture and norms of the telecommunications sector to better align with community and government expectations of an essential service. For example, the requirements to be constructive and cooperative, and for compliance – are characteristics that currently cannot be assumed when referring to telecommunications companies. However, the proposed telecommunications executive accountability regime should go further to ensure the harmful corporate practices currently entrenched within the industry are curbed. We recommend broader application, increased penalty units and more significant deferred remuneration periods and a requirement to treat customers fairly, as we have suggested to the current Financial Accountability Regime bill alongside other consumer advocacy bodies.⁸
18. The executive accountability regime in the Bill also misses the many opportunities to address poor customer outcomes that come from breaches of obligations unrelated to the customer service guarantee, namely, breaches of the current TCP Code.
19. Many of the greatest harms we see at Consumer Action are related to the breaches of the TCP Code – such as mis-selling unaffordable services and products and denying financial hardship to customers experiencing vulnerable circumstances, including financial disadvantage. For example, this news article from May 2021 demonstrates the outrageous sales conduct and debt collection harassment of a major telecommunications company: [Telcos slammed for signing up customers to unwanted phone deals \(theage.com.au\)](https://www.theage.com.au/national/victoria/telcos-slammed-for-signing-up-customers-to-unwanted-phone-deals-20210526-p57v8x.html).⁹
20. We recommend the executive accountability regime require all accountable persons to take all reasonable steps to prevent regulatory breaches, including breaches of the TCP Code and other consumer protections based in industry codes, in the sections of the telecommunications companies for which they are responsible.

RECOMMENDATION 7. Expand the executive accountability regime to cover all aspects of regulatory breaches that cause consumer detriment, including those currently contained within the TCP Code.

Enforcement and administration

21. Regulators must be given the tools and create the appropriate culture to regulate effectively, including through direct enforcement and litigation where appropriate to not only encourage, but ensure compliance. This is not simply to punish telecommunications providers for unlawful conduct, but also an important consumer protection and deterrence role. Individual consumers encounter obstacles (particularly financial barriers) when enforcing their lawful rights.

⁶ Lonergan Research for ACCAN, Spotlight on Telco Commissions and Targets: Exploring Telecommunications Providers' Sales Incentive Practices (27 March 2019) p 5 - 6, available at: <http://accan.org.au/our-work/research/1584-spotlight-on-telco-commissions-and-targets>.

⁷ [2021] FCA 502

⁸ Choice, Consumer Action Law Centre, Financial Counselling Australia, and Super Consumers Australia, "Submission to Treasury: Financial Accountability Regime" (August 2021), available at: [Finance executives who break the law must be held to account - Consumer Action Law Centre](https://www.theage.com.au/national/victoria/telcos-slammed-for-signing-up-customers-to-unwanted-phone-deals-20210526-p57v8x.html).

⁹ See: <https://www.theage.com.au/national/victoria/telcos-slammed-for-signing-up-customers-to-unwanted-phone-deals-20210526-p57v8x.html>.

22. ACMA's ability to fulfil its compliance and enforcement role is still impinged by the lack of regulatory and enforcement tools available to it. There has been little expansion of ACMA's enforcement tools since 1996, when its predecessor, the Australian Communications Authority (ACA) was provided with what were then described as 'safety net powers which may be used if self-regulation in an industry sector has serious failings'.¹⁰
23. The telecommunications industry stands out from other like sectors in that the majority of its industry members are not currently required to be licensed. It is almost unfathomable that this essential service currently operates in a framework that enables rogue conduct in this way.
24. A licensing scheme for telecommunications would not only clarify industry parameters but also equip the ACMA with an effective tool for compliance and enforcement. Regulator power to suspend or revoke a licence, or to impose conditions on a licence (such as a condition to provide information to the regulator or to modify a policy that disadvantages any class or all of its customers, as are available in the energy sector),¹¹ would provide a significant incentive for lawful and appropriate industry behaviour. In fact, some theories of regulation pinpoint licence-related regulatory tools as the most effective methods of enforcement, stronger than even criminal penalties.¹²
25. ACMA must have increased regulatory and enforcement tools to be able to effectively monitor compliance and deter poor conduct, as well as to test and clarify through the law where relevant, including:
- The ability to take direct enforcement action immediately on noncompliance with a telecommunications rule, not just upon non-compliance with a direction.
 - Discretion to use its regulatory and enforcement tools in a non-linear fashion and to act quickly.
 - Licence-related tools, including imposing conditions upon licenses, suspensions and revocation.
 - Comprehensive information gathering powers, including through the development of performance indicators for provider reporting.
 - Litigation, including to test the law.
 - Media tools, including a commitment to routinely issue press releases upon both the commencement and conclusion of any litigation or other significant enforcement activity (with providers named).
 - Increased civil penalties and infringement notices.
 - Increased availability of criminal penalties.
26. A Reserve Bank of Australia Board member, Professor Ian Harper, recently wrote:
- "Regulation is a poor substitute for culturally-embedded moral restraint. But when the latter is non-existent, regulation may be necessary to secure the public interest against the worst excesses of self-serving behaviour by those in positions of trust."*¹³
- RECOMMENDATION 8.** The ACMA must empowered to enforce telecommunications obligations directly and with the tools that best influence compliance in the relevant context.

¹⁰ Senate Standing Committees on Environment and Communications, Report on the Inquiry on the Telecommunications Bills Package 1996, (5 March 1997), Ch 2 Para 2.32., https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Completed_inquiries/1996-99/telebills/report/contents.

¹¹ Electricity Industry Act 2000 (Vic) ss 23A and 26.

¹² Consumer Action Law Centre, Regulator Watch, above n 88, 12, citing Braithwaite's Regulatory Pyramid.

¹³ Harper, Ian R. and Andrew Ramadge, "The human dimension of good economic policymaking", *Economic Analysis and Policy* (Vol 68, December 2020) p 175 – 178, available at: [The human dimension of good economic policymaking - ScienceDirect](https://www.sciencedirect.com/science/article/pii/S0950080420300000).

Schedule 5 – Corporate responsibility for preventable deaths

27. Consumer Action does not have expertise in relation to this.

Schedule 6 – Telecommunications Ombudsman

28. While Consumer Action supports the ideas and detail in much of this bill, we are opposed to the removal of the Telecommunications Industry Ombudsman or any move to transform to a 'Telecommunications Ombudsman' as appointed by the Minister.
29. The fact that the TIO is industry funded body does not itself render the TIO an ineffective or non-independent external dispute resolution body. Rather, we consider the greatest impediment to the TIO in appropriately or efficiently resolving disputes has been the absence of strong, clear codes or regulation to assist them in resolving consumer disputes. Industry self-regulation has failed to empower its EDR body with a sufficiently robust set of rules. In this regard, we reiterate our call for better direct regulation across the industry.
30. In Australia, the industry-based ombudsman model is well-established and highly effective, particularly in the banking, energy and water sectors. It is our strong view that, in providing access to justice, the establishment of mandatory industry-based EDR schemes has been one of the more significant advances in consumer protection in Australia the past 20 years. Consumer advocates have long supported the benefits of industry EDR schemes, which provide free, fair, fast, and accessible dispute resolution and are an extremely important alternative to courts and tribunals, which are expensive, slow and largely inaccessible without legal representation. Though room for improvement remains, we remain supportive of the TIO.
31. The TIO must meet the Government's own Benchmarks for Industry-Based Customer Dispute Resolution ('EDR Benchmarks'),¹⁴ re-released by the Minister for Small Business in 2015. The benchmarks are: accessibility; independence; fairness; accountability; efficiency; and effectiveness. These well-established principles and the accompanying Key Practices¹⁵ have underpinned effective EDR in many industry sectors. The 2017 Independent Review of the TIO ('TIO Review') found that the TIO meets the EDR Benchmarks. We refer to the findings of the TIO Review, which set out in detail the measures taken by the TIO that demonstrate compliance with these benchmarks.¹⁶
32. The TIO also meets the criteria for describing a body as an Ombudsman endorsed by the Members of the Australian and New Zealand Ombudsman Association ('ANZOA').¹⁷
33. Our general concerns about establishing a new body include that significant time and resources will be required to replace a model that already meets the necessary benchmarks. Furthermore, there is no guarantee of its independence, without a board made up of individuals with consumer and industry experience.

Division 7 – Other matters

34. We welcome the concept of 'league tables' published annually but recommend this be left to the current TIO. The TIO is empowered to publish data on complaints – updates to the TIO's Terms of Reference,

¹⁴ Australian Government, The Treasury, Benchmarks for Industry Customer Dispute Resolution (February 2015), available at: <https://treasury.gov.au/publication/benchmarks-for-industry-based-customer-disputeresolution>.

¹⁵ Australian Government, The Treasury, Key Practices for Industry Customer Dispute Resolution (February 2015), available at: : https://static.treasury.gov.au/uploads/sites/1/2017/06/key_pract_ind_cust_dispute_resol.pdf.

¹⁶ TIO Review p 91 – 98.

¹⁷ Essential Criteria for Describing a Body as an Ombudsman – Policy statement endorsed by the Members of the Australian and New Zealand Ombudsman Association (February, 2010).

recently approved and to commence in January 2021, increase the ability for the TIO to name providers in its public data.

RECOMMENDATION 9. Remove the section of the Bill calling for the replacement of the Telecommunications Industry Ombudsman with a 'Telecommunications Ombudsman' to be appointed by the Minister.

SUMMARY OF RECOMMENDATIONS

RECOMMENDATION 1. Consider requiring telecommunications companies to remove or reduce staff remuneration that incentivises sales over customer services (for example, sales commissions).

RECOMMENDATION 2. Telecommunications companies should be required to properly check whether a customer can afford a service or device before selling it, including checking income and expenses.

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RECOMMENDATION 5. Telecommunications companies should be required to investigate and identify whether mis-selling has occurred in breach of its obligations when a customer has difficulty making payments, and take appropriate action where this is found (e.g. debt waivers).

RECOMMENDATION 6. Disconnection, restriction or suspension of this essential service is not an appropriate response to hardship unless that reduction in service is specifically requested by the customer to reduce their bills.

RECOMMENDATION 7. Expand the executive accountability regime to cover all aspects of regulatory breaches that cause consumer detriment, including those currently contained within the TCP Code.

RECOMMENDATION 8. The ACMA must be empowered to enforce telecommunications obligations directly and with the tools that best influence compliance in the relevant context.

RECOMMENDATION 9. Remove the section of the Bill calling for the replacement of the Telecommunications Industry Ombudsman with a 'Telecommunications Ombudsman' to be appointed by the Minister.

Please contact Senior Policy Officer **Brigette Rose** at **Consumer Action Law Centre** on 03 9670 5088 or at brigette@consumeraction.org.au if you have any questions about this submission.

Yours Sincerely,

CONSUMER ACTION LAW CENTRE



Gerard Brody | CEO