



# Keep Me Posted Australia

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## Submission to the Productivity Commission Consumer Law Enforcement and Administration Draft Report

January 2017

Lodged electronically on: <http://www.pc.gov.au/inquiries/current/consumer-law/make-submission>



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## About Keep Me Posted

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Keep Me Posted AU (KMP) is a consumer advocacy campaign run by TSA limited, a not-for-profit organisation, and is a partnership of advocate groups, charities, consumer groups, employer and employee representatives, industry and local and federal representatives who believe in the consumer's right to choose the way companies communicate with them.

Increasingly, businesses are imposing fees and restricting access to paper bills and statements, denying their customers an informed choice.

It is the most vulnerable Australians who carry the greater burden.

Further findings of an international survey<sup>1</sup> show that 76% of Australian consumers are unhappy if asked to pay a premium for paper bills and statements, and 69% want the option to continue receiving printed information as it provides a permanent record for important documents.

We believe that it is every consumer's right to choose, free of charge, how they are contacted by banks, utility companies and other service providers.

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<sup>1</sup> Two Sides / Toluna Survey, 2016

Keep Me Posted would like to thank the Commissioner for the opportunity to provide comments on the Consumer Law Enforcement and Administration Draft Report in support of our position that the current consumer protection legislation (particularly the Competition and Consumer Act 2012 and the Electronic Transactions Act 1999) ought to be amended.

Keep Me Posted's objectives are:

1. That all Australians are given the choice of receiving important information through their preferred delivery option, digital or paper, without a penalty fee;
2. That all Australians are treated equally when it comes to accessibility, frequency, content and service delivery, regardless of their choice of how they receive information from suppliers.

Keep Me Posted's main activities comprise of:

- producing and distributing research about topics directly linked to the issue of charges for paper bills and statements, including:
  - ✓ Digital divide
  - ✓ Digital literacy
  - ✓ Real cost of charges on Australian households
  - ✓ Real cost for companies and organisations charging the fees
  - ✓ Online finance management and digital banking
  - ✓ Online scams
- engaging with political representatives (local, state and federal) to raise awareness about the issue among policy makers and to eventually influence a change in regulation and legislation.

Keep Me Posted would like to provide feedback on two aspects raised in the Consumer Law Enforcement and Administration Draft Report that are critical for our organisation's activities:

1. Developing a national database of consumer complaints; and
2. Funding of policy and advocacy research.

- ✓ Keep Me Posted fully supports the project to create a national database for intelligence gathering and sharing of consumer complaints and further outlines the benefits of such a database for its campaign in the comments provided below.
  - ✓ Further, Keep Me Posted supports the Commission's 2008 recommendation for additional funding for consumer policy and advocacy research.

This submission provides some critical insight to the issues outlined above. Keep Me Posted would also welcome further engagement with the Productivity Commission if there are matters upon which we could usefully elaborate.

Thank you again for the opportunity to provide our feedback and submission overleaf.

### Intelligence gathering and sharing: work towards a national database of consumer complaints and incident

In response to paragraph 4.2 Intelligence gathering and sharing of the draft report<sup>2</sup>, Keep Me Posted expresses its support for the creation of a national database of consumer complaints.

We believe that such a database would address many of the issues preventing an accurate appreciation of the real impact of fees levied on Australian consumers simply to receive paper bills and statements:

#### Scale of the issue

Keep Me Posted believes that the number of consumer complaints related to paper fees levied by suppliers is largely underestimated. Keep Me Posted supporters report having complained to a number of consumer protection regulators or organisations (Telecommunications Industry Ombudsman, Financial Ombudsman Service, Consumer Affairs Victoria, etc.) and yet, the issue does not seem to appear in the activity reports of those institutions. A consolidated national database would provide a more accurate account of those complaints.

#### Accurate identification of the specificity of the issue

It seems that, in general, complaints about fees levied by supplier for paper bills and statements are consolidated under the wider topic of 'Billing issues'. This lack of specificity in the treatment of the complaints is another impediment to an accurate appreciation of the impact of the paper fees on Australian consumers.

#### Evaluation of the real impact of paper fees

The harm to the consumer of fees levied by supplier for paper bills and statements goes way beyond the financial impact they make on already economically vulnerable households. Directing people who are not digitally skilled to use digital communications exposes them to the following risks:

- Being the victim of online scams which cost Australians tens of millions of dollars every year<sup>3</sup>;
  - Mismanaging their finances due to diminished access to the information contained in their bills and statements<sup>4</sup>;
  - Incurring unsolicited direct carrier billing on their telecommunications bills which often goes unnoticed for extended periods or indefinitely.
- Keep Me Posted requests the implementation of a national database that accurately reflects the true scale and impact of the fees levied by suppliers for paper bills and statements.

Keep Me Posted particularly appreciates the Commission's comment on p111 of the draft report: *"Analysis of a combined dataset, which was updated in a timely way, would generally lead to the earlier identification of systemic issues and better focus on regulatory effort."*

We believe that when the Electronic Transactions Act 1999 allowed organisations to communicate with their customers via electronic means a safety net for consumers was removed. The Act says

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<sup>2</sup> Consumer Law Enforcement and Administration Draft Report, 2016, pp 108 - 116

<sup>3</sup> The ACCC Scamwatch website reports a \$81 594 589 loss for 2016. Source: <http://www.scamwatch.gov.au>

<sup>4</sup> See on page 12 of the present submission, Supporting evidence, 4. Managing finances online.

that recipients of electronic communications must consent to the information being given that way<sup>5</sup>, however it fails to specify that if paper communications are preferred, recipients should not be charged a fee for it.

- Keep Me Posted requests the implementation of a national database that would allow early detection of how regulatory and legislative changes affect consumers' rights.

Keep Me Posted believes that the national database should be publically available and that consumer advocacy groups should be granted full access. Complete transparency is critical to guarantee a flowing and constructive national conversation to ensure the betterment of consumer protection. Keep Me Posted also believes that a publically available database would make corporations aware of their customers' struggles and motivate them to respond before being forced to by law. In short, a publically available database would provide an incentive to businesses to adopt good practices.

In the case of paper fees levied by suppliers, businesses might also be incited to innovate in order to offer user friendly digital platforms rather than punishing their customers for not spontaneously adopting them. In a contribution published on Forbes.com, Rich Daly explains that a large part of tech-savvy consumers in the US do not embrace digital communications for their bills and statements because companies fail to provide efficient and consumer friendly digital alternatives to paper bills and statements<sup>6</sup>.

- Keep Me Posted requests the implementation of a national database that would be publically available and fully accessible to consumer advocacy groups.

Keep Me Posted further requests that corporations are held accountable and sustain their claims when they respond to consumer complaints. For instance, corporations should provide evidence of the alleged cost and reveal their cost structure when they argue that the implementation of fees for paper bills and statements is due to the increasing cost of print and postage.

- Keep Me Posted requests accountability for the corporate sector when they deal with consumer complaints.

Keep Me Posted also acknowledges the concerns outlined by the ACCC in their submission to the Issues Paper<sup>7</sup> as well as the Commission's concerns about the cost-benefits analysis of the implementation of a national database of customers complaints. However, we suggest that the benefits of a national database are extensive when consideration is given to the significant financial risks consumers find themselves exposed to. It is the most disadvantaged Australians who are most impacted by suppliers levying fees for paper communication – Australians who are disabled, in a low-income household or dependent on a parenting payment, an age pension, disability support pension or a Newstart allowance, are twice to five times more likely to have no access to the internet than the national average<sup>8</sup>. The benefits of addressing this disadvantage are greater than merely restoring consumer rights and extend to matters of social justice and equity.

- Keep Me Posted requests a cost-benefit analysis for the implementation of a national database that also takes into consideration the wider social benefits of stronger consumer protection.

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<sup>5</sup> Electronic Transactions Act 1999, Section 9 Writing and Section 11 Production of document

<sup>6</sup> The barrier to America going paperless, Forbes, 2016

<sup>7</sup> ACCC, Submission 23, p.20

<sup>8</sup> See on page 11 of the present submission, Supporting evidence, 2. Digital divide in Australia.

## Research and advocacy as inputs into policy

On page 187 of the draft report, paragraph 6.3 Research and advocacy as inputs into policy<sup>9</sup>, the Commission poses the following question, *“Is there still a need for additional funding for consumer policy research as envisaged in the Commission’s 2008 Review of Australia’s Consumer Policy Framework?”* and reminds us that:

*In 2008, the Commission recommended (rec. 11.3) that:*

*Within the broader consumer policy implementation framework agreed to by CoAG, the Australian Government, in consultation with MCCA [Ministerial Council on Consumer Affairs], should take the lead role in developing arrangements to provide additional public funding to:*

- *help support the basic operating costs of a representative national peak consumer body;*
- *assist the networking and policy functions of general consumer advocacy groups; and*
- *enable an expansion in policy-related consumer research.*

*Part of the latter funding component should be used to establish and support the operation of a dedicated National Consumer Policy Research Centre (NCPRC), with the remainder provided as contestable grants for research on specified consumer policy issues. An independent review of the effectiveness of the NCPRC in delivering beneficial research outcomes should be conducted after 5 years.*

*The new funding arrangements should be subject to appropriate guidelines and governance requirements to help ensure that taxpayer support contributes to high quality advocacy and policy research in priority areas, and that the national interest is appropriately represented.*

*Source: PC (2008, pp. 291–292).*

On page 189, the Commission further asks *“whether, in 2016, there is significant unmet demand from policy makers for input from informed consumer advocates or, at least, whether some consumer advocates that could make a valuable contribution are unable to take up opportunities to provide input because they lack resources”*.

Keep Me Posted fully supports the Commission’s 2008 recommendation and confirms that in our opinion there is a still need for additional funding for consumer policy and advocacy research.

In a statement commenting on the release of the Commission’s Draft report<sup>10</sup>, Consumers’ Federation Chair Gerard Brody said *“Consumer groups around Australia work on issues of concern to all Australians, but they do not have the resources to cover each issue of importance, or to match the considerable resources of industry.”*

Independent and in-depth research is critical for political representatives and policy makers to work on policy making. When engaging with political representatives, Keep Me Posted is rightly asked to provide independently produced evidence to sustain its claims. The provision of resources in this area will aid policy makers and policy advocates.

Keep Me Posted strongly endorses the Consumers’ Federation of Australia comment<sup>11</sup>:

*“A funded peak body with capacity to both coordinate diverse consumer organisations as well as undertake or commission consumer research will facilitate better consumer policy outcomes,*

<sup>9</sup> Consumer Law Enforcement and Administration Draft Report, 2016, pp 185 - 190

<sup>10</sup> Productivity Commission calls for greater investment in consumer advocacy, Consumers’ Federation of Australia, 2016

<sup>11</sup> Consumers’ Federation of Australia, submission 19 p.5



*because the consumer interest will be strongly articulated in policy debates...”*



- Keep Me Posted requests additional funding into consumer policy and advocacy research to provide better insights for policy makers, ensuring greater consumer protection.

**Keep Me Posted requests:**

- The implementation of a national database that:
  - accurately reflects the true scale and impact of the fees levied by suppliers for paper bills and statements.
  - allows the early detection of how regulatory and legislative changes affect consumers' rights.
  - is publically available and fully accessible to consumer advocacy groups.
- The accountability of the corporate sector when they deal with consumer complaints.
- A cost-benefits analysis for the implementation of a national database that also takes into consideration the wider social benefits of stronger consumer protection.
- Additional funding into consumer policy and advocacy research to provide better insights for policy makers, ensuring greater consumer protection.

## Supporting evidence



Increasingly, businesses are imposing fees and restricting access to paper bills and statements, denying their customers an informed choice.

The digital divide is a significant national issue and impacts 3.5 million Australians with the most vulnerable who carry the greater burden. Beyond that, many consumers, even digital natives, still often choose paper as their preferred communication channel.

Outcomes for individuals who manage their finances online and the vulnerability to online phishing scams argue in favor of maintaining access to paper bills and statements, without penalty, for those who want to make that choice.

### 1. More companies are charging fees for paper bills

Following a trend that started around 2014-2015, every month more companies announce they are going to start charging a fee to their customers who wish to receive their bills and statements on paper.

To date, Keep Me Posted has identified the companies below:

1st Energy	\$2.00	
AGL	\$1.75	
Buxton Hampton East	\$1.50	
City Bank	\$2.00	
Comm Bank	\$2.50	From February 2017
Diamond Energy	\$1.93	
Dodo	\$2.20	
Energy Australia	\$1.69	
Enova Energy Pty LTd	\$1.50	
Foxtel	\$2.00	
GloBird Energy	\$2.00	
iinet	\$1.49	
NSW Roads end Maritime Services	\$2.20	
Optus	\$2.20	
Origin	\$1.75	
People Energy	\$2.00	
Q Energy	\$2.75	
Telstra	\$2.20	
Vodafone	\$2.20	

To our knowledge, they represent ~33% of the main energy providers and ~70% of the main telcos.

Some of the companies outline they are willing to waive the fees for their most vulnerable customers, however the criterion for fee exemption is inconsistent. Keep Me Posted has found

financial institutions will waive for those over eighty (80) years old, whereas others will waive for those of pension age (60-65 years). Testimonials from Australians raise concerns that companies make it difficult for their customers to claim their right to exemption. Keep Me Posted argues that it is not the position of the private sector to determine an Australian citizen's 'vulnerability' and any assessment of this kind must remain within Government care and protection.

In reviewing Australians concerns, Keep Me Posted has analysed the cost of paper billing (printing, mail processing and postage) compared to the fee charged to the customer and reveals the fee charged is extended beyond cost capture of increased procurement costs of business.

Companies use the argument of an alleged increase of printing and postage costs to justify starting to charge for paper bills and statements. Keep Me Posted highlights that, in fact, printing costs over the past five years have decreased year on year<sup>12</sup>.

In addition, Australia Post prices over the past five (5) years have only increased by \$0.25 per unit, yet fee penalties are averaging around \$2.20 per unit.

Analysis of the market of major mail users found that cost per unit equates to \$0.88 for a standard bill or \$1.02 for a personalised marketing style invoice, with an average fee penalty to the customer of \$2.20, this potentially realizes a \$1.32 profit to companies with millions of customers across Australia. By example of sector, the four (4) large banks in Australia promote having over 10 million customers, per statement and over a twelve (12) month period that realises \$158.4 million in additional revenue per company. Across the four (4) entities, this equates to \$633.6 million above the costs of doing business from the procurement costs of providing the paper bill or statement.

An Australian household receives an average of 7 to 8 invoices per month with an average cost of \$2.20 per bill, this equates to an additional cost of \$180.00 per annum. Further, fees often apply to non-electronic payment methods and other non-direct debit methods: cheques, Debit or Credit Card, at the Post Office counter, over the biller's counter etc. With a fee that is usually \$1.00 per transaction, the total additional cost of "pay-to-pay" is \$270.00 per household and per year.

The impact year after year on the most vulnerable Australians' finances is significant in an increasing digital divide and seeing real impact on the average Australian family.

## 2. Digital divide in Australia

Currently 3.5 million Australians do not have internet access at home, more often these people are disadvantaged, elderly, or low income families. Only 51% of Australians over 65 are internet users.

Sources: [Infxchange, Annual Report 2016](#)

[Australian Bureau of Statistics. Household Use of Information Technology, 2014-15](#)

In Australia if you are disabled, in a low-income household or dependent on a parenting payment, an age pension, disability support pension or a Newstart allowance, then the likelihood of having no Internet at home is twice to almost five times higher than the national average.

Source: [Australian Bureau of Statistics, 2012](#)

Access to the internet falls to just 57% for households with an income less than \$40,000. Affordability is an issue across Australia and rises in internet cost, even slight, are likely to further

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<sup>12</sup> IBISWorld Industry Report, Printing in Australia, 2015

exacerbate the digital divide.

Source: Australian Communications Consumer Action Network (2015)

38% of Australians feel that they are being left behind with modern technology, rising to 44% who are concerned about the future.

Source: Australian Institute of Family Studies. Australian Family Trends No. 7 - March 2015

The Affordability Index number shows Australia going backwards with households now spending 1.17% of their income on internet services (up from 1% in 2014).

Source: Australian Digital Inclusion Index 2016

### 3. Consumer preferences

Results of a recent international survey conducted by Toluna Inc. illustrates that a majority of Australians want to retain a choice for paper options rather than be forced into “digital-only” communications.

- 76% of Australian consumers are unhappy if asked to pay a premium for paper bills and statements;
- 69% want the option to continue receiving printed information as it provides a permanent record for important documents;
- 58% are unhappy that the responsibility to print valuable documents is being passed to them;
- 44% would consider changing service providers if asked or forced to move to paperless communication;
- 43% don't have a reliable internet connection and want paper records.

Source: Two Sides / Toluna Survey, *The Attractiveness and Sustainability of Paper and Print*, 2016

### 4. Managing finances online

Findings of a behavioural study by London Economics for Keep Me Posted UK (2015) show that those who receive their bank statements on paper are more likely to understand and retain the information, to take appropriate action and to make better financial decisions as a result.

- People are more than twice as likely to recall their current balance when they receive their bank statement on paper (82% compared to 32% who receive online statements).
- People who receive paper statements are better at correctly assessing the financial health of their account (75% compared to 48%).
- 90% of those who receive paper statements are better able to spot ways in which to improve their finances (compared to 77%).



This has to be seen in a context where not only Australia's average household debt is four (4) times what it was twenty-seven (27) years ago, but also that the ratio of household debt to disposable income has almost tripled in the same time, from 64% to 185%. This trend has led the International Monetary Fund (IMF) to single out Australia, along with Canada and Singapore, for the notable fast pace of private debt growth.

Sources: London Economics, *Managing money online*, 2015

University of Canberra - NATSEM, *Buy now pay later. Household debt in Australia*, 2015

International Monetary Fund, *Debt. Use it wisely.*, 2016

## 5. Online phishing scams

The ACCC's Scamwatch and the Australian Cybercrime Online Reporting Network (ACORN) have aggregated their data to provide a clear picture of the losses caused by scams in Australia in 2015.

- Total scam losses exceeded \$229 millions (\$85 millions reported to Scamwatch and \$127 millions reported to ACORN).
- 38.8% of the scams were delivered by email, internet and social media.
- 40% of reports were made by people aged 55 and over.

Source: ACCC – Scamwatch, 2015

## 6. Testimonials

All the testimonials below have been collected by the Keep Me Posted campaign, they represent only a fraction of the comments received.

*"As an older Australian, I am quite cautious about what I do online and I do not have a mobile phone. If I support a company by buying its products or services I expect them to provide me with a FREE paper bill to check, pay, and then keep. I file these bills and they act as a reference for guarantees etc.*

*We now are forced to receive our electricity account online and it is a nightmare to check both the usage and cost - why should I have to print it off in order to understand it!!!*

*We do have the internet at home but my husband, for example, would no more know how to access any form of information online than fly to the moon".*

**Suzanne, 25/04/2016**

*"When I changed my Telstra bundle quite some time ago they refused to send a monthly hardcopy bill unless they charged me \$2 for the privilege. I agreed to this as I didn't want bills sent via email as I find it too easy to forget that they need to be paid.*

*Earlier this year Telstra put up the price for paper bills to \$2.20 without any notification.*

*Not only that but they wanted to charge me \$1.00 because I pay them at the post office. This meant that they got an extra \$3.20 because I prefer to receive and pay my bills the old fashioned way.*

*I contacted them and protested vigorously and was credited with those charges but there's no guarantee that it won't happen again so it means that I have to be vigilant when the bills arrive!*

*I wrote to the Ombudsman's office to say that their practice was discriminatory to everyone, especially the aging population, but they just said that Telstra was within the law to charge for these two things.*

*I say - lets change the law to give consumers a choice!!"*

**Lynne, 26/04/2016**

*"Sometimes, email or electronic notification for things is fine, but for my banking documents and my bills, I prefer paper.*

*Most providers have taken away that choice! They want to CHARGE me to receive my bill!*

*At one stage, I was changing providers when I felt I was being blackmailed into receiving electronic bills, but it's so common now, I can't change providers any more. I'm left with having to use my paper, and my printer to print these electronically sent bills. Saves THEM money but costs me more to use their services in the way I need to."*

**Alison, 8/06/2016**

*"I object to being repeatedly badgered by almost every company that provides services to me to change my communication preferences and bill access from paper bills via Australia Post to electronic only.*

*I will not agree to a reduction in service whilst there is no reduction in price. I also do not want to spend one day each month sitting in front of my computer to access numerous online accounts to download and print my bills.*

*These companies all say that they are trying to save the environment when in fact they are all driven by a burning desire to save money to increase their profit level.*

*I will continue to insist on receiving paper bills via Australia Post as has been the case my entire working life. What happens if your computer fails? How will you get your bill then? What if you can't afford the internet connection, the computer, the printer, the printer ink and the paper? What about those on the pension or a government benefit?"*

**Brett, 30/06/2016**

*"I do not like doing business on line and refuse to do so. For this I am being discriminated against. I object to being charged \$2.50 for a Macquarie Cash Management Account bank statement and \$3.20 for a Telstra paper bill. This is NOT FAIR!!! I like to keep a paper record of my business dealings. I do not want to have to print out info on my printer!!!"*

**Patricia, 11/07/2016**

*"Charging for paper bills is causing angst and issues for senior citizens. For many who do not have access to computers and are living on a pension, the additional cost is an impost they can't afford."*

**Linda, 20/07/2016**

*"It seems unfair that invoices and reminders that were once sent as normal business now require an extra fee to receive. I find that paper invoices don't get missed and my preference is to receive paper invoices."*

**Gavan, 8/08/2016**

*"Energy Australia is now charging for paper bills & payment via Australia Post from 1/11/16. Why should I have to pay a fee just to get a bill or pay a bill. A rip-off."*

**Chris, 12/08/2016**

*"I put all my paper bills in order of payment date and use them as a reminder to pay. I also keep all my bills for use at tax time and if I have an issue with a bill and need to go back to view them. I'm a busy working mother who hardly gets time to shower let alone check my email on a regular*

*basis (sometimes I don't check it for weeks or a month), then hook up to a printer to print the bill. Too time consuming and way too hard for me..."*

**Deanna, 30/08/2016**

*"Imposition of a fee is very discriminatory towards the people who do not or cannot."*

**Emeric, 16/09/2016**

*"Organisations that have sent me mail for 35 years now want to charge me? I think it's totally unfair and unreasonable."*

**Tamara, 28/09/2016**

*"Paper bills are important to me as I attach the receipt & therefore have proof of payment readily available. Previous accounts are therefore also at hand for comparison. The internet does play up at times so I don't feel I can trust it with important things."*

**Yvonne, 26/11/2016**

*"I think it is important to still provide a paper/mail communication for those people that desire it. Why does the public have to be bulldozed down a path that not everyone wants?"*

**Noela, 29/11/2016**

*"I believe they are taking the onus off themselves for the service that comes with the account holder. They have chosen without any consultation with the customer to do this what happened to customer service."*

**Barry, 29/11/2016**

*"I was switched to e-mail billing by Telstra some years ago without my consent - as I don't often check my e-mails I didn't pay one monthly bill as I hadn't received my regular bill in the mail. When I complained to Telstra they waived the overdue fee and admitted it was an "administration error" that caused some customers to be switch to e-mail billing without them knowing.*

*My bank (Suncorp Metway) always has "go paperless" marked on their envelopes and one time they sent me a letter saying that my billing would be changed automatically to paperless sometime in the next month. I rang them and complained and said I want a paper bill mailed to me - I am still receiving my paper bill.*

*My partner received a letter from AGL (Electricity) saying that if she still wanted to receive a paper bill there would be a fee. She hasn't had a bill from them since then, but I am sure the next bill will include a fee as she has not nominated to receive an e-mail bill.*

*This whole thing is ridiculous - part of doing business is to supply a customer with an invoice, account or receipt - why have people accepted that doing a company's printing for them for free is somehow convenient? This is nothing short of a fraud - what other business functions will companies put back onto the consumer convincing them that it is somehow convenient for the customer."*

**Greg, 29/11/2016**

*"I am retired, I do not always have access to a printer and I feel disadvantaged not having the right of choice as to how I receive my bills. I object strongly to having to pay to be a customer."*

**Hazel, 30/11/2016**

*"I am very technologically challenged. I struggle with using my computer & if it wasn't for my husband helping me, I would most definitely be more offline than on.*

*I won't let businesses I deal with send me bills online. I demand that they send them to me the old fashioned way, into my letterbox.*



*I like to be able to physically hold a bill, & file it away into a display folder. I know I have got it then. It's so easy for emails to get lost, & the number of emails that never arrive is not just 'a few'. It happens a lot, apparently.*

*And you know, it's not just 'us oldies' who prefer paper bills. I have heard that some Gen Y's are wanting to do it the paper way, too. Their email bills have not turned up, & then the next thing they know, their power has been cut off.*

*Why should we be bullied by big business? They never used to charge us for paper bills before the internet was around, so why should they be allowed to do it now?"*

**Jan, 30/11/2016**

*"Hi, I receive a lot of mail for my clients on a mail redirection service and it is so much more efficient to continue to get the mail via the letterbox rather than email. Email mail can be easy to miss."*

**Megan, 2/12/2016**



## International examples

### Europe

Countries within the EU have been quick to tackle the issue with campaigns such as Keep Me Posted EU leading the charge. Legislation that protects consumer rights has already been enacted throughout numerous member states.

**Germany** In October, 2014 the Federal Court of Justice upheld the Higher Regional Court of Frankfurt's decision declaring it unlawful for mobile phone providers to include an additional fee for paper bills. According to the court, paper bills and their shipping are part of the provider's expenses which cannot be passed on to the consumer.

**France** Since January 2014, French consumers have had the right, free of charge or disadvantage, to receive bills on paper rather than electronic means. The request may be made at any time including at the time of subscription.

**Spain** A new consumer law passed in 2014 implemented the Spanish consumer's right to receive paper bills for all types of consumer contracts and this right cannot be made dependent on any economic amount. Companies also need the explicit consent of the consumer to legally send electronic instead of paper bills.

**Finland** In March, 2014 The Finnish Market Court declared that opting for paper-based invoices and bills is a basic right and consumers who opt for it are not allowed to be charged extra.

**Ireland** The Irish Commission for Communications Regulations issued a decision in June, 2013 that declared paper bills must be issued by service providers free of charge unless otherwise requested by the consumer.

**Belgium** Belgian law allows all consumers to choose how they receive paper bills without being charged and requires companies to receive explicit consent from consumers before switching to electronic bills.

**Austria** The Austrian Supreme Court of Justice has recently decided it is unlawful for telecommunications service providers to automatically switch from paper to electronic billing, even if the consumer had the chance to object prior to the switch. The Telecommunications Act allows consumers to receive paper bills free of charge, whether they opt for it at the conclusion of the contract or at any time afterwards.

**The Netherlands** Dutch national Ombudsman Reinier van Zutphen has concluded that tax authorities have committed major mistakes transitioning from paper to digital forms. According to the Ombudsman's report published in 2016, the government should not force citizens into making their tax declarations online, as this could result in the most vulnerable members of the community losing out.

### North America

**Canada** In 2014, the Canadian Federal government blocked telecommunication and cable companies from charging fees for paper bills. Last year, the government announced that it also proposed to abolish paper bill charges levied by banks.

**United States of America** While there are currently no plans for federal legislation, the state of New York has led the way, prohibiting companies charging New York customers fees for paper bills. In Pennsylvania, The Public Utility Commission (PUC) determined that charging customers for a bill was 'an unjust and unreasonable practice' and that 'the cost of paper bills should be part of normal service rates'.