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Regulatory Burdens Review
Productivity Commission
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Telstra response to the Productivity Commission's draft report from its annual Review of Regulatory Burdens on Business

Telstra welcomes the opportunity to respond to the Productivity Commission's draft report from its annual **Review of Regulatory Burdens on Business**. The annual review provides an important perspective on, and discipline and scrutiny of the public policy process. As the Commission identifies in its report, this process has a tendency, at least in telecommunications, to approach every issue by creating new regulations that can be uncoordinated, overlapping and duplicative.

Telstra supports initiatives to improve productivity by streamlining regulatory requirements and reducing the regulatory burden on business in a way which does not compromise the Government's underlying policy intent.

The draft report identifies that the Federal Government is reviewing regulation in the telecommunications industry and has released a Discussion Paper for that purpose ('National Broadband Network: Regulatory Reform for 21st Century Broadband'). We understand that the Productivity Commission has limited its focus in this review to issues outside the Discussion Paper.

While it makes sense to avoid devoting resources at this time to reviewing a regime which will inevitably change, Telstra recognises that the Federal Government's review and the Productivity Commission's Review have a fundamentally different focus. Productivity Commission analysis is focused on ensuring that regulation does not impose unnecessary burdens on business. The Commission's objectivity and experience in evaluating regulatory regimes to identify where regulations are unnecessarily burdensome, complex or duplicative provides an important perspective. At an appropriate time, Telstra would welcome the Productivity Commission having a role in ensuring that the telecommunications regulatory regime, as reformed following the current consultation, meets best practice regulatory principles.

In relation to the Commission's draft Recommendations in Chapter 4 of the Report, Telstra supports the specific telecommunications recommendations (4.1 and 4.2) as common sense improvements to the current regulatory regime. Specifically:

Telstra supports customer information requirements being reviewed with the aim of streamlining the requirements and improving the comprehensibility and clarity of the information provided to customers (Draft recommendation 4.1). We endorse the approach suggested by the Communications Alliance that the review should establish:

- What requirements are unnecessary or redundant;
- What alternative mechanisms are available to the provision of information such as 'on request' and 'online'; and
- Whether a sunset clause should be inserted into the relevant regulations.

Telstra would be happy to assist this review by providing further detail about the current requirements and their impact on business processes and customers.

Telstra supports reviewing prepaid mobile phone identity checks and revision of the regime to allow law enforcement agencies to better identify owners at a lower cost to business. Telstra endorses AMTA's comments on this issue. (Draft recommendation 4.2)

Overall, Telstra agrees with the Commission's commentary around telecommunications regulation development (where we support revisions in line with best practice), the volume of regulation and information reporting. We welcome the encouragement of greater harmonisation and streamlining of reporting requirements.

Yours sincerely

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