

Thursday, March 31, 2005

Telecommunications Consumer Policy
Department of Communications, Information Technology and the Arts
GPO Box 2154
Canberra ACT 2601

Dear Sir/Madam,

**Ref: Public Comment on Australian Communications Authority Report
*Preventing Unexpectedly High Bills: Credit Management in Telecommunications***

Interactive Data Services welcomes the Minister's invitation to the public for comment on the conclusions and recommendations of the ACA in regard to Credit Management Tools and the opportunity to offer its views regarding "*detailed specification of requirements for the implementation of the framework via a service provider determination, with an option open to carriage service providers to prepare individual plans which are approved by the regulator, would be most appropriate regulatory mechanism for achieving improvement in credit management practices.*"

The expertise of Interactive Data Services lies in the technical implementation of systems that manage the real-time communication between the customer and the carriage service provider (and content service providers), *via* the GSM handset, that will deliver the proposed Credit Management Tools to the customers.

During April 2005, an Australian carriage service provider will provide their customers with a mobile data service that supports many of the Credit Management Tools outlined in Table 2 on pages 47 and 48 of the ACA Report.

Interactive Data Services provides the technical capability and management applications to the carriage service provider by exploiting a feature of the GSM mobile networks called *Unstructured Supplementary Service Data* ("USSD").

USSD provides the carriage service providers with an inexpensive, resource efficient, interactive and secure data channel to all their GSM customers *via* the pre-installed mini-browser in the GSM handset required by the GSM Specification. USSD uses a simple, user-friendly, text-based, intuitive menu-driven interface to manage the interactive request and response process between the customer and carriage service provider (or service provider).

Interactive Data Services can and does provide Credit Management Tools outlined in Table 2 of the ACA Report using USSD, including (but not limited to) those described below (those in **bold type** are live services available now on an Australian mobile network).

In regard to "*Outcome 1: Consumers possess a reasonable understanding of the telecommunications products and services that they use and have certainty about the costs of*



telecommunications services, the associated risks and their expenditure on these services”, Interactive Data Services can facilitate all three Credit Management Tool, being:

- Advice of charge during call or session,
- **Advice of charge at start of call or session**, and
- **Information about products and services and about risks of high bills.**

In regard to “*Outcome 2: Consumers have the means to properly manage their expenditure on telecommunications services*”, Interactive Data Services provides a mobile phone environment for customer-managed self-care from the GSM handsets, such as:

- Monitoring of expenditure and warning of extreme expenditure: provided by default by CSP,
- **Targeted help service for new customers**,
- Targeted help service for vulnerable customers,
- **Real-time or near-real time account information**, and
- Monitoring of expenditure and warning of extreme expenditure: provided at request of customer.

In regard to “*Outcome 3: The expenditure of consumers on telecommunications services is limited in line with their preferences or their ability to pay*”, Interactive Data Services provides a secure payment, prepayment transfer and “cap” management capability to support:

- Pre-paid account: sole option provided by CSP as result of credit assessment,
- **Pre-paid account: chosen by customer**, and
- Hard-cap (across total bill, selected services or individual calls): limit specified by customer.

USSD provides an inexpensive, secure, real-time solution that can be instantly deployed to the whole GSM subscriber base immediately with the installation of a server within the mobile networks.

Interactive Data Service will be delighted to provide the Minister and the Department with additional technical information and demonstrations, at their convenience.

In conclusion, Interactive Data Services believes that when the Minister determines the “*most appropriate regulatory mechanism for achieving improvement in credit management practices*” USSD will prove to be the most appropriate technical mechanism for achieving that improvement in credit management practices.

Yours sincerely,

Andrew Baartz
Chief Executive Officer