

27 February 2015

Ms Tracey Rowley
ICT Statistics Review Secretariat
Australian Bureau of Statistics
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Dear Ms Rowley

Information and Communications Technology Statistics Review 2014-15

The Telecommunications Industry Ombudsman (TIO) welcomes the opportunity to respond to the consultation by the Australian Bureau of Statistics (ABS) and the Department of Communications on the Information and Communications Technology (ICT) Statistics Review 2014-15.

The TIO values the collection and dissemination of ICT data and information in Australia. It helps us perform our main roles of resolving telecommunications disputes, improving telecommunications services and being an independent voice within the telecommunications industry.

We welcome the Review and endorse the opportunity to discuss ways to enhance the quality, timeliness, availability and exchange of ICT data and information in Australia. Our submission to this Review is enclosed in the **Appendix**. Our submission identifies several means to achieve these improvements:

- harmonisation of ICT-related definitions in line with international standards
- greater consistency in the timing and updating of ICT-related information
- further collaboration in the sharing of ICT-related information between organisations.

If you require further information, please contact me on 03 8600 8700 or by email (david.brockman@tio.com.au).

Yours faithfully



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Appendix: TIO response to the ICT Statistics Review 2014-15

1. Definitions for key terms

- **What definitions do you use for information and communications technology?**

The Telecommunications Industry Ombudsman (TIO) takes a flexible approach to ICT-related definitions and specific technical terms due to the rapid pace of change in the telecommunications sector. This approach has enabled us to capture issues arising from increasingly complex complaints about emerging technologies, products and devices. Examples include the converged environment of mobile data services, the proliferation of smart devices used to access the internet and the multi-technology rollout of the National Broadband Network (NBN).

We use a variety of ICT-related definitions and terms from sources such as:

- legislation and regulations, for example, the *Telecommunications Act 1997* and the *Telecommunications (Consumer Protection and Service Standards) Act 1999*
- industry codes and standards, for example, the *Customer Service Guarantee Standard 2011*, the *Telecommunications Consumer Protection Code 2012* and operational codes and guidelines
- industry-related official reports produced by regulators, such as the Australian Communications and Media Authority (ACMA) *Communications Report* and the Australian Competition and Consumer Commission (ACCC) *Telecommunications Report*
- Australian Bureau of Statistics (ABS) data in catalogues such as *Catalogue 8153.0 - Internet Activity, Australia*; *Catalogue 6401.0 - Consumer Price Index, Australia*; and the *Census of Population and Housing*
- NBN Co publications, such as weekly progress reports, financial and strategic reports
- telecommunications service providers' annual reports and website statistics
- international sources, such as the International Telecommunications Union (ITU) and the Groupe Speciale Mobile Association (GSMA).

The TIO uses its own terms and definitions to record complaints data. These mainly relate to the types of services offered by service providers (landline or fixed telephone services; internet services; mobile services; satellite services) or other industry products and services (payphones, phonecards and mobile premium services).

In a competitive sector like telecommunications, there is a constant introduction, promotion and adoption of new and emerging technologies. The proliferation of over-the-top services, content services, mobile wallets, mobile applications (apps) and other emerging communications-related technology make this industry a fluid yet complex one. There is a real need to ensure definitions and statistics relevant to this industry are up-to-date and meet the needs of ICT users both nationally and globally.

The TIO supports the harmonisation of ICT-related definitions across private, public and not-for-profit sectors. We support the aim of achieving greater consistency with international standards such as those endorsed by the ITU. Greater harmonisation would also promote better functionality and utility of ICT information and data. This would improve the comparability of information and the accuracy of ICT reporting and research.

2. Priority information requirements

- **What are your critical data needs in this area? What do you use the information for? (Why is this information important to you? What decisions are made using the information?)**
- **What benefits are there to your organisation from having this information available to you (e.g. impact on your time frames, productivity, costs etc.)?**

The TIO uses ICT data to help us perform our main roles within the telecommunications industry, namely resolving telecommunications disputes, improving telecommunications services and being an independent voice in the telecommunications industry. We collect a range of ICT data relating to products and services used within the industry for mobile, landline and internet services as well as services offered over the NBN.

This information helps us to:

- be informed about emerging issues within the industry
- analyse and understand trends in TIO complaints data
- give a broader context to some of the major issues in TIO complaints, and
- provide clear advice and information to TIO staff to help them resolve disputes.

In turn, this contributes to our ability to, among other things:

- provide a dispute resolution service that is accessible, independent, fair and effective
- make internal policy decisions about the handling of different types of disputes
- contribute to industry initiatives and important changes in legislation with the aim of improving consumer protection
- provide regulators and other agencies with analysis of key issues and trends
- provide stakeholders with evidence-based submissions and reports about different consumer protection issues or industry practices, and
- pro-actively identify, investigate and resolve potential systemic issues within the industry.

Some relevant examples of our ICT data needs include sourcing industry-related statistics from:

- **the ACMA Communications Report**
 - Key indicator data that feeds into internal management reports at TIO.
 - The number of services in operation (SIOs) in Australia. This data helps us to provide additional context to our reporting, primarily by enabling us to publish the number of new complaints per SIO. Notably however, SIO data by individual service providers is not publicly available and the TIO is required to source this by agreement with some providers for our quarterly *Complaints in Context* report.
 - Statistics on the number of subscribers, usage and technology uptake help us provide a broader context to the analysis of TIO complaints data, for example in the annual review of the financial limits on the powers of the TIO.
 - The number of active landline and internet services in Australia. We compare this information to the number of NBN-related complaints that the TIO records and also use it for our *Complaints in Context* report.

- **the ACCC Telecommunications Report**
 - The movement in average real prices paid for telecommunications services in Australia helps inform policy decisions or analysis we provide in submissions or reports on particular complaint issues.
- **several ABS catalogues**
 - **6401.0 - Consumer Price Index, Australia:** The movement in the consumer price index for the communications group (covering postal services as well as telecommunication equipment and services) helps inform policy decisions we make about the TIO's jurisdiction or functions.
 - **8153.0 - Internet Activity, Australia:** Statistics on internet data activity and technology help give broader context to TIO complaints data for a range of TIO submissions, briefing papers and reports to external and internal stakeholders. This information also helps inform internal policy decisions which affect the TIO's operations and effectiveness.
 - **Census of Population and Housing:** Five-yearly census data provides background context for the analysis of TIO complaints by postcode, which is published each year in the TIO's Annual Report. This data is also used to highlight complaint trends in regional and remote areas.

3. Gaps, overlaps, limitations and appropriateness of existing ABS ICT statistics and other authoritative data sources

- **Do the ABS statistics meet your information needs? If not, please provide a reason (e.g. accuracy, timeliness, relevance etc.) Are you aware of any other data that are, or may be publicly available which would meet your information needs? Who owns these data?**

The TIO values the ICT data and information we obtain from a range of important sources such as the ABS, the ACMA, the ACCC and other sources. It enables us to critically analyse TIO complaints data and gain a broader understanding of complaint issues in the telecommunications industry.

We would like to highlight the following areas that could further enhance the usefulness and accessibility of ICT data and information:

Greater consistency in the timing of information

One way to maximise the advantages of currently available ICT data across different sources would be to have a more systematic approach to releasing or publishing this information. Harmonising publication schedules would increase the utility and relevance of ICT data and information.

In the telecommunications industry, several of the most prominent sources of ICT information come from the *ACMA Communications Report*, the *ACCC Telecommunications Report* and various ABS catalogues containing important information such as subscriber, usage and pricing statistics. However different publication schedules and delays limit our ability to derive the full value from the information in these reports.

For example:

- **ACMA Communications Report** – generally released five months after the end of financial year
- **ACCC Telecommunications Report** – released seven to eight months after the financial year
- **ABS catalogue 8153.0 - Internet Activity, Australia** – generally released three to four months after the scheduled bi-annual publication date.

We acknowledge that release dates of this data can often be attributable to time and resource constraints. They also reflect the enormous amount of work that goes into collecting, analysing, compiling, designing, promoting and releasing these publications. Given these circumstances, we appreciate that it would be challenging to achieve greater synchronicity across organisational publication schedules.

However, we would be interested to collaborate and be involved in discussions on this issue given the potential benefits.

Greater collaboration in sharing information

Another way to capitalise on currently available ICT information is for greater collaboration and transparency in sharing specific types of information. With the right confidentiality agreements in place, this would increase the efficiency in collecting and the value of using ICT information.

The benefits of sharing and responsibly using this type of information could be significant.

Types of data required to meet information needs

The types of data that are not currently available but that would be of great assistance in meeting the TIO's information needs include:

- Monthly, quarterly or annual data on services in operation segmented by service type for all telecommunications service providers.
- Monthly, quarterly or annual data relating to household expenditure on communications products and services segmented by service type or hardware.
- CPI data for specific communications products and services and census data relating to population size and location.
- *Current* broadband data consumption or data usage per household.

At present there is consumption data available from the *ACMA Communications Report* and ad hoc reports from private companies such as Nielsen and Roy Morgan. However, there can be difficulty reconciling data from these sources. The variable timing and frequency of these publications can also impact on the data's usability. In addition, differing methodology and purposes for producing these publications create additional challenges for using data from a range of sources.

4. Options for use of administrative by-product and 'big data' as efficient alternatives

- **Is there data that your organisation holds which are, or could be released publicly to add to the available information on ICT? Please include any administrative or 'big data' sources.**

In addition to the TIO's dispute resolution activities, we are also an independent and expert voice about matters affecting the telecommunications industry.

One of the ways in which we perform these functions is through our capacity to provide the public, industry, regulators and other stakeholders with data and analysis of key issues and trends affecting the industry. Not only does this information inform the many submissions and reports provided to stakeholders, it also enables us to identify and investigate potential systemic issues within the industry. In this context, the TIO provides ICT-related data and information both publicly and to a wide variety of industry stakeholders.

ICT-related TIO data is released publicly via:

- the TIO website for quarterly, annual and contextualised complaints statistics
- TIO annual reports with detailed yearly data, information, trends and analysis on complaints and issues
- the TIO publication *TIO Talks*, which contains quarterly trends and analysis on complaints and issues
- external submissions posted on the TIO website and the relevant website of the organisation receiving the submissions. These submissions generally contain specific data on issues or trends relevant to the subject matter of the submission.

The TIO also provides data directly to external stakeholders including:

- regulators such as the ACMA for its *Communications Report* and the ABS for its *Internet Activity* catalogue
- monthly reports for key stakeholders containing complaints and issues data
- systemic issues or non-compliance reports for regulators
- ad hoc reports prepared for external stakeholders on emerging issues or trends.

The TIO does not have 'big data' sources of information.

5. Other challenges

- **Other than cost, are there any major barriers to collecting, producing and/or using statistics to inform your ICT statistical information needs?**

In the TIO's experience, other issues that limit the effective exchange and use of ICT information are outlined below.

Differences in how organisations categorise industry-specific information

The different ways by which organisations categorise information or the various degrees to which an organisation segments key information can:

- limit the use readily available and prominent ICT data sources
- create incompatible data sets that make it difficult to compare data across different sectors or organisations
- restrict the scope, accuracy and utility of ICT reporting and research, or
- increase the time and resources necessary to analyse the data.

In the telecommunications industry, the degree to which internet service providers choose to segment the different types of broadband connections can have a direct impact on the compilation of statistics (for example, *Internet subscribers by type of access connection, for ISPs with more than 1,000 subscribers* in the ABS catalogue *8153.0 - Internet Activity, Australia*). This can detract from the accuracy and efficiency of collecting, disseminating and using these statistics.

Intermittent updating of key economic statistics

The infrequent updating of statistics can also limit the utility of key ICT information. For example, when key economic statistics are only updated in some ABS catalogues every few years, it can be challenging to apply the data to analyse emerging issues within the telecommunications industry.

For example, the TIO was interested in comparing the average household monthly expenditure on communications products in Australia to the median disputed amount for excess mobile data charges. This proved to be difficult because the *ABS Household Expenditure Survey, Australia: Detailed Expenditure Items* had not been updated since 2003-04. We instead consulted with the ABS and used a separate methodology to arrive at this figure. This required a larger investment of time on the part of both the TIO and the ABS.

We acknowledge that the updating and publishing of key statistics are dependent on an organisation's time and resource constraints, and that priority is often placed on more important data sets.

6. Organisational specific needs

- **What role do you see your organisation playing in the collection and dissemination of publicly available ICT statistics?**
- **What role(s) do you see for other organisations in ICT statistics?**

We have highlighted our various roles in the telecommunications industry and the types of ICT-related data that we use or collect.

We would be keen to collaborate and discuss:

- greater information sharing between the TIO, ABS, the ACMA and other relevant agencies
- harmonisation of definitions for ICT-related terms
- greater coordination in the publication schedules used for ICT data across relevant organisations.