



Regulatory Affairs
ACCC
GPO Box 520J
MELBOURNE VIC 3001
Email: <mailto:Nicole.Hardy@acc.gov.au>; Carl.Toohy@acc.gov.au

9 May 2007

Dear Ms Hardy

Line Sharing Service (LSS) Declaration Inquiry

Thank you for the opportunity to provide a submission to the LSS Declaration Inquiry.

The Consumers' Telecommunications Network (CTN) is a national peak body of consumer and community organisations, and of individuals representing community interests, who participate in developing national telecommunications policy. We advocate policies for better access, quality of service and affordability of telecommunications facilities for all residential consumers. CTN's members are national and state organisations representing consumers from non-English speaking backgrounds, deaf consumers, indigenous people, low income consumers, people with disabilities, young people including children, pensioners and superannuates, rural and remote consumers, women and consumers in general.

In analysis of the key issues for our constituents, CTN focused on a comparison of the situation where the LSS remained declared versus the situation where the LSS declaration was removed and the resulting gaps in consumer protections. CTN believes that there would be a number of ramifications for end users that would result from the LSS not being subjected to the Standard Access Obligations in section 152AR of the *Trade Practices Act 1974*. In particular the parity of technical and operational quality of the declared service ensured in section 152AR(3) and also the arbitration and declaration mechanisms for access disputes.

Further to this the huge variety of technological configurations that are open to VoIP-users to adopt and adapt are not well documented and are seemingly non-exhaustive at present. This is also a consideration for near-future access so that multi-CSP's could possibly use any remaining non-voice band

frequencies of the spectrum. **CTN therefore strongly advocates that the LSS remain a declared service.**

We hope these comments are of use to you. Should you wish to discuss this response in more detail please contact myself or Annie McCall at the Consumers' Telecommunications Network on 02 9572 6007 or at ctn@ctn.org.au.

Yours sincerely

A handwritten signature in black ink that reads "Teresa Corbin". The signature is written in a cursive style with a long horizontal flourish at the bottom.

Teresa Corbin
CTN Chief Executive Officer

Annie McCall, CTN Information Officer, and Teresa Corbin, CTN Chief Executive Officer prepared this submission. The CTN Council approved it out of session

