



TELECOMMUNICATIONS CONSUMER GROUP SA INC

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Attention Israel del Mundo
ACCC
Via email 6 November 2007

Greetings Israel

The ACCC page on Telstra's transmission capacity exemption application was discussed by the TCG SA at their last meeting held in Adelaide on Wednesday 24th October.

Perhaps some information about the Telecommunications Consumer Group SA Inc [TCG SA] at this stage would be welcome by you.

The TCG SA was formed in January 2001 with most members previously being on the SA Telstra Consumer Consultative Council [before the State Councils were disbanded in favour of just the National Council]. It is the only truly independent representative Telecommunications Consumer Group in the whole of Australia.

Members therefore have a great understanding of telecommunications consumer issues.

Current members of the TCG SA Inc are -

- * Australian Seniors Computer Clubs
- * Blind Citizens Australia [SA Royal Society for the Blind]
- * Community Information Strategies Australia Inc [CISA]
- * Consumers SA
- * NovitaTech, Novita Children's Services Inc. [Formerly the Crippled Children's Assoc of SA]
- * Health Consumers of Rural and Remote Australia Inc
- * Multicultural Communities Council of SA
- * National Council of Women SA Inc [NCWSA]
- * SA Council of Social Services Inc [SACOSS]
- * SA Financial Counsellors' Association
- * Small Business and SOHO - SETEL
- * South Aust Farmers' Federation

Our Terms of Reference -

We are a Peak Body of representatives who have an interest in Telecommunication issues.

The TCG SA reviews telecommunication issues from a consumer perspective.

The role of the TCG SA is to campaign on behalf of peak bodies to lobby Government and carries in addressing the inequities within telecommunications.

Some history about the TCG SA -

In early 2002 The TCG SA was invited to join the Communications Alliance [ACIF] CC. Our organisations' membership of the *ACIF Consumer Council* is based upon our -

- * Demonstrated representativeness of consumer/public interest perspectives, particularly as it relates to SA consumers;
- * Experience and expertise in the representation of consumer/public interest issues;
- * Our knowledge/understanding of consumer/public interest issues with respect to telecommunications;
- * Our demonstrated ability to consult with and understand the needs of consumers;
- * Our ability to accurately input/represent consumer telecommunications issues;
- * Our commitment to working cooperatively within the telecommunications industry to achieve negotiated outcomes;
- * Our representative's commitment to working cooperatively with other consumer and public interest organisation representatives to achieve consensus of views and beneficial outcomes for consumers; and
- * Our capacity to represent the views of our constituencies in CA/ACIF forums.

In relation to Telstra's exemption application, the recommendation of the Telecommunications Consumer Group SA Inc is - to leave the status quo [to leave the standard access obligation as it currently stands] at this time.

We feel that altering the exemption declaration from "*within 1 km or less from the GPO of a regional centre for a given capital-regional route*" to "*where there is a carrier with an optical fibre network within a distance (from the regional centre) of 5 per cent of the route distance between the capital city and the regional centre*" will put up the end price to the end consumer, the further you are away from the Capital City. This of course will also mainly affect the disadvantaged.

We also feel that further analysis is warranted on the effect any change would have on regional communities.

[While the above comments are those of the members of the TCG SA Inc, they may not necessarily be those of the organisations that they represent.]

Sincerely



Chair

TCG SA Inc