



Consumer Credit  
Legal Centre NSW

March 2013

## Submission in relation to the feasibility of a prohibition on the charging of fees for an unlisted (silent) number service

by the

Consumer Credit Legal Centre (NSW) Inc

Consumer Credit Legal Centre (NSW) Inc (“CCLC”) is a community-based consumer advice, advocacy and education service specialising in personal credit, debt, banking and insurance law and practice. CCLC operates the Credit & Debt Hotline, which is the first port of call for NSW consumers experiencing financial difficulties. We also operate the Insurance Law Service which provides advice nationally to consumers about insurance claims and debts to insurance companies. We provide legal advice and representation, financial counselling, information and strategies, referral to face-to-face financial counselling services, and limited direct financial counselling. CCLC took over 18,000 calls for advice or assistance during the 2011/2012 financial year.

A significant part of CCLC’s work is in advocating for improvements to advance the interests of consumers, by influencing developments in law, industry practice, dispute resolution processes, government enforcement action, and access to advice and assistance. CCLC also provides extensive web-based resources, other education resources, workshops, presentations and media comment.

Thank you for the opportunity to comment on the feasibility of a prohibition on the charging of fees for an unlisted (silent) number service.

### **ACCAN Submission**

CCLC supports the submission of the Australian Communications Consumer Action Network (ACCAN). ***Telecommunications Act 1997 (Cth)***

The Consumer Credit Legal Centre (“CCLC”) strongly supports Recommendation 72-17 contained in report no. 108 of the Australian Law Reform Commission on Australian privacy law and practice. We believe that the *Telecommunications Act 1997 (Cth)* should be amended to prohibit the charging of a fee for an unlisted (silent) number on a public number directory.

The CCLC supports the reasoning of the Australian Law Reform Commission (ALRC) being that the monthly fee charged to consumers who don't want their phone number released should be removed for all consumers. Privacy is a basic right and consumers should be able to control the use or disclosure of their personal information with as little effort or inconvenience as possible.

The CCLC is pleased to see that Telstra has recently decided to waive the silent line fee for customers whose personal safety is at risk because of domestic violence. Although this is an important step in protecting some of our community's most vulnerable members, it does not cover the many other situations where consumers need privacy. CCLC is aware of many different situations where a silent number is needed including relationship disputes, threats from family members and threats from the public just to name a few.

The CCLC strongly encourages Telstra and other Australian telcos to extend this exemption to include all consumers.

Thank you again for the opportunity to comment on the feasibility of a prohibition on the charging of fees for an unlisted (silent) number service. If you have any questions or concerns please do not hesitate to contact the Consumer Credit Legal Centre on (02) 9212 4216.

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