the
communications
council commercial
creativity and
connection

Committee Secretary
Senate Standing Committee on Environment, Communications and the Arts
PO Box 6100
Parliament House
Canberra ACT 2600
Australia

Thank you for the opportunity to respond to your questions on notice.

Find below our answers; the first we submit on behalf of our organisation, The Communications Council, the second is a joint submission under the auspices of the cross-industry group consisting of The Australian Association of National Advertisers (AANA), the Australian Direct Marketing Association (ADMA), The Communications Council, the Internet Industry Association (IIA), the Interactive Advertising Bureau (IAB), and the Media Federation of Australia (MFA).

Yours sincerely,

Daniel Leesong
Chief Executive Officer
The Communications Council

This submission responds to the 'question on notice' to the Communications Council in relation to the application of offline thinking to online problems.

In the digital world there are many examples illustrating the transition from older 'offline ' to online thinking, especially around matters of self moderation, monitoring, listening and quality control.

Wikipedia - The worlds 5th biggest website is managed by people and community– whilst most onlookers have expected Wikipedia to fail on any number of large hurdles Wikipedia has proven critics wrong; it is probably the ultimate testament to people power with more than 70,000 contributors actively managing the site. Sites like Trip Advisor allow consumers to alert other consumers to both good and bad destinations. Facebook groups self moderate and help answer each other's questions (such as the P&O cruises group in Australia). Businesses like Best Buy use thousands of staff to crowd source solutions to consumers' problems on Twitter. Communities like Whirlpool.net.au self serve broadband and technology issues and have helped solve a range of issues over the years. Vogue forums in Australia carry highly influential word of mouth / conversations between its users.

The modern digital consumers are adapting fast, collaborating and becoming smarter working as a whole. Businesses are increasingly exposed to a more powerful and connected consumer and more likely to create workable options and solutions in accordance with users needs in this context.

This submission responds to the 'question on notice' to the Communications Council in relation to a cross-industry initiative to establish standards for online behavioural advertising in Australia.

The Australian Association of National Advertisers (AANA), the Australian Direct Marketing Association (ADMA), The Communications Council, the Internet Industry Association (IIA), the Interactive Advertising Bureau (IAB), and the Media Federation of Australia (MFA) jointly respond to this question.

Online behavioural advertising does not involve the collection of personal information or information that identifies the individual using an internet enabled device. In online instances where an individual's personal information is known the *Privacy Act 1988*, and the full protection that it provides, applies.

Industry however recognises that some elements of the community are not aware of online behavioural advertising practices and more should be done by the industry to improve consumer awareness of what online behavioural advertising is and what it is not.

In light of the above, the AANA, the ADMA, The Communications Council, the IAB, the IIA and the MFA wish to confirm that our organisations agreed to come together to develop industry guidelines, that are suitable for the Australian context, for online behavioural advertising. The work on the guideline is underway and proceeding quickly.

This initiative was still at formative stages at the time of the public hearing and as expected the guidelines involve careful examination of a complex range of issues. Nonetheless industry is prioritising the development of an industry guideline as we recognise the importance of putting a scheme in place that will apply consumer-friendly standards to online behavioural advertising.

The AANA, the ADMA, The Communications Council, the IIA, the IAB and the MFA would be pleased to provide the Senate Standing Committee on Environment and Communications with further information on the industry guideline once it is completed which we hope will be ready in time for the Senate Committee's consideration for its final report.