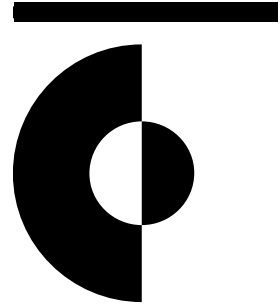


6 February 2008

Review of Australia's Consumer Policy Framework
Productivity Commission
PO Box 1428
CANBERRA CITY ACT 2616



**Telecommunications
Industry
Ombudsman**

Deirdre O'Donnell
Ombudsman

Dear Ms Irvine

The Telecommunications Industry Ombudsman ('TIO') welcomes this opportunity to provide comment to the Productivity Commission on the draft report of its Review of Australia's Consumer Policy Framework, released on 12 December 2007.

This short submission is provided in response to the Commission's request for all written comments to be provided no later than 6 February 2008. However, I wish to advise that as Ombudsman I will take advantage of the opportunity to supplement this submission through an appearance at one of the public hearings being held later this month. I will separately provide a registration form for this purpose.

At the broadest level, the TIO welcomes the comprehensive overview of the national consumer protection policy framework provided by the Commission in its draft report, which clearly spells out the key issues to be addressed in developing a nationally coherent policy framework. The TIO recognises and supports the benefits that should flow through to all consumers as a result of achieving this objective.

Against the background of a dynamic telecommunications sector, to which the TIO brings a national consumer redress perspective, we are pleased to have the opportunity to participate in the Commission's current consultative process, and look forward to engaging with the Commission as it refines its telecommunications-specific recommendations in particular. As an independent industry ombudsman scheme with a strong track record in dispute resolution, we believe we will be able to assist in the development of telecommunications-related recommendations that should meet the Commission's overarching objectives by drawing on our extensive knowledge and experience of consumer complaints.

We would also like to acknowledge the Commission's focus on a simplification of the redress options available to telecommunications consumers as a desirable outcome, an objective we support.

"providing independent, just, informal and speedy resolution of complaints"

Telecommunications Industry Ombudsman Ltd ABN 46 057 634 787

Website: www.tio.com.au
Email: tio@tio.com.au

Postal address:
PO Box 276
COLLINS ST WEST VIC 8007

Street address:
Level 3
595 Collins Street
MELBOURNE VIC 3000

Tel freecall*: 1800 062 058
Fax freecall*: 1800 630 614
Telephone: (03) 8600 8700
Fax: (03) 8600 8797

*calls from mobile phones may incur charges

I should explain that this short submission does not provide detailed comments in response to the TIO-specific recommendations in Chapter 9 because those matters are presently under active consideration by the TIO Council, which is the body with prime responsibility for policy matters and the oversight of the TIO scheme's operations under the TIO's Constitution. The Council is comprised of equal numbers of consumer and industry representatives, with an independent Chair, and hence is well placed to provide a broad-based response to the issues that flow from those recommendations that relate to the telecommunications industry.

The TIO Council follows a defined process when changes to its jurisdiction are contemplated. I will explain this process to the Commission at the public hearing. I will also provide an overview of any issues that the TIO Council may identify in its present detailed considerations of the Chapter 9 recommendations, with a specific focus on recommendation 9.2. As part of this oral submission, I would like to take the opportunity to share with the Commission information about how the TIO Council has in the past considered some of the matters canvassed in recommendation 9.2, as well as to provide some relevant recent complaint data.

In conclusion, I confirm that the TIO looks forward to continuing its dialogue with the Commission and working constructively to ensure the development of the best possible telecommunications-related recommendations that are consistent with the Commission's overarching objective of developing an enhanced and coherent national consumer policy framework.

Yours sincerely

Deirdre O'Donnell
OMBUDSMAN