



Mr Peter Sutton  
Manager, National and Community Interests Section  
Australian Communications and Media Authority  
PO Box 13112 Law Courts  
Melbourne VIC 8010

Sent via email.

31 January 2017

Dear Mr Sutton,

RE: REMAKING THE TELECOMMUNICATIONS INTEGRATED PUBLIC NUMBER DATABASE 2007

Thank you for giving the Research Industry Council of Australia (RICA) the opportunity to provide comment on the draft IPND Scheme 2017.

RICA represents both business and professional bodies in the market and social research industry. Our constituent bodies are the Association of Market and Social Research Organisations (AMSRO), representing businesses, and the Australian Market and Social Research Society (AMSRS), representing individual research professionals. The market and social research industry turns over \$700 million annually and employs over 12,000 people, of which over 4,100 are full-time professionals.

RICA welcomes the remaking of the Telecommunications Integrated Public Number Database Scheme 2017 to include the IPND Review Report's (dated December 2015) Recommendations 5 and 7. We agree that the proposed changes to introduce on-going, de-identified access via an Authorisation Holder (Research Body) will effectively reduce the current administrative issues and costs associated with the Scheme and potentially increase its use across the research industry.

For the past seven years, RICA has been actively pursuing changes to the Scheme to support the increasing need for researchers to be able to access accurate telephone sample that is a statistically valid representation of the Australian population, ensures that those 'hard to reach' people's opinions are heard and reduces cost to government and ultimately, taxpayers.

The proposed IPND access model (Figure 1/page 9) for a Research Body to manage the disclosure of de-identified information to its members for specified research purposes achieves the following key objectives for our industry:

1. Supports the government's position in relation to deregulation and the reduction of compliance costs.
2. Continues to provide a sensible approach to protecting people's privacy. As per the model, researchers should be permitted **to access de-identified information via an approved and trusted Authorisation Holder** (Research Body/or Research Association).
3. Enables researchers to conduct their work in a professional and timely manner, whilst upholding the highest quality and privacy standards for government research projects.



4. Enables researchers to access high quality telephone sample to support critical business and government decisions for today's Australia and help plan for tomorrow's Australia.

We note however, that the IPND Scheme (which includes both anonymised listed and unlisted numbers) represents a grossly underutilised and valuable research resource which is unique to Government and largely unavailable to researchers elsewhere. So, whilst RICA supports the proposed reform and acknowledges that it's a significant step forward, the real key to on-going accurate telephone sample (to successfully inform health, electoral and government policy), lies in researchers having access to both the listed and unlisted numbers. Furthermore, access to the proposed listed numbers only via the IPND Scheme, risks the continuance of the current situation whereby the Scheme is grossly underutilised as a research resource (as is evident currently with only two research authorisations in the past ten years) and its full potential as a national infrastructure resource not realised.

To effectively represent the Australian population, government research projects require telephone sample to contain listed and unlisted numbers. RICA acknowledges that the inclusion of anonymised unlisted (mobile) numbers in the proposed IPND Scheme 2017 is a broader policy issue and not within the scope of this consultation. We do however seek the opportunity to review the IPND Scheme 2017 further with the appropriate agencies to avoid this latest reform being a lost opportunity and one which doesn't realise the full potential for accurate research, economic efficiencies and deregulation.

To further support this critical need, we note the recent *ACMA Communications Report 2015-16* whereby the increase in mobile-only households rose from 29 to 31% of the total population with a staggering 59% of 25-34 year olds reported using mobile only. *(Please see appended case studies highlighting cost and representative concerns with regards to unlisted numbers.)*

Further comments on the proposed changes to the IPND Scheme are overleaf and aimed at ensuring that the best possible conditions are made available for the broader research community to undertake high quality telephone surveys with the Australian public whilst safeguarding their privacy and personal information.

Should you require further information please contact Sarah Campbell, Executive Director AMSRO on (02) 8017 6717 or [sarah@amsro.com.au](mailto:sarah@amsro.com.au)

Yours sincerely,

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GENERAL COMMENTS

APPROVING ONGOING IPND ACCESS FOR A RESEARCH ENTITY TO CONDUCT RESEARCH

ACMA Consultation paper: *The proposed arrangements for implementing recommendation 5 of the IPND Review Report to allow the granting of ongoing authorisations for the purposes of conducting permitted research (see Part 4 of the draft IPND Scheme 2017).*

RICA supports the proposed reform to grant ongoing authorisation for permitted research via an Authorisation Holder (Research Body) and suggests such access be extended to a Research Body whose members are underpinned by strict quality standards such as research conducted by members of the Association of Market and Social Research Organisations (AMSRO) and the Australian Market and Social Research Society (AMSRS). Monitoring and reporting on access via a trusted user model is key to ensuring IPND safeguards are maintained.

For example AMSRO and AMSRS members operate under the following industry co-regulated codes and practices:

- The Privacy (Market and Social Research) Code 2014;
- The AMSRS Code of Professional Behaviour;
- International Standard for Market, Opinion, and Social Research (ISO 20252)<sup>1</sup>
- International Standard for Access Panels in Market Opinion and Social Research (ISO 26362); and
- The Qualified Practising Market Researcher scheme (QPMR);

And therefore represent a trusted user access model, which reduces risk and protects the privacy of respondents.

AMSRO and AMSRS members have a long and highly successful track record with compliance. Both organisations provide member's ongoing professional development and training programs in relation to privacy, quality, data security, legal and ethics to ensure obligations are well understood and compliance mechanisms implemented. For example, AMSRO member organisations work under the only registered, industry privacy code in Australia and like the proposed IPND Scheme, the Code is registered under Federal Register of Legislative Instruments (FRLI).

For over 13 years, AMSRO members have worked under the Privacy Code (without breach) whereby AMSRO is the Administrator, and Mr Timothy Pilgrim The Australian Privacy Commissioner, the Adjudicator. By law, the Privacy Code requires AMSRO to report annually to the OAIC and manage a co-regulated, independent Privacy Compliance Committee which is currently chaired by former Tasmanian Senator, the Hon. Terry Aulich and includes consumer representative David Vaile, Vice Chair, Australian

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<sup>1</sup> The International Standard for Market, Opinion, and Social Research (ISO 20252 or 26362) is mandatory for AMSRO member organisations and independently audited on an annual basis.)



Privacy Foundation, co-Convenor, Cyberspace Law and Policy Community, UNSW Law Faculty, industry lawyer, Andrew Maher, Partner CIE Legal and representatives from member organisations.

The objectives of the industry Privacy Code include:

- i. To set out how the Australian Privacy Principles (APPs) in the Privacy Act are to be applied and complied with by AMSRO members in the conduct of market and social research;
- ii. To facilitate the protection of identifiable research information provided by, or held in relation to, the participants or subjects of market and social research; and
- iii. To enable quality research to be carried out, so as to provide accurate information to government, commercial and not-for-profit organisations to support their decision-making processes.

All AMSRO and AMSRS members comply with a rigorous set of requirements as outlined in the AMSRS Code of Professional Behaviour. Together, the Privacy Code and industry Code of Professional Behaviour mandate that:

- > Research is only conducted upon consent.
- > Researchers must conform to all relevant national, state and international laws.
- > Participants' identifiable research information must not, without their consent, be revealed to anyone not directly involved in the research project and not be used for any non-research activity directed to individual participants.
- > Researchers must ensure that projects and activities are designed, carried out, reported and documented accurately, transparently and objectively.
- > Researchers must take reasonable steps to destroy identifiable research information or to ensure that the information is de-identified when the information is no longer needed. Researchers must take reasonable steps to ensure that the identifiable research information that they collect, store, use or disclose is accurate, up-to-date and complete.
- > Researchers must take reasonable steps to ensure that any identifiable research information that they disclose to another person or organisation:
  - a) Will only be retained, used or disclosed by the recipient of the information in a manner that is consistent with the Australian Privacy Principles; and
  - b) Will be protected by the recipient from misuse, interference and loss and from unauthorised access, modification, use and disclosure; and
  - c) Will only be used or disclosed by the recipient for a specified limited purpose and will be destroyed or de-identified once this purpose has been achieved.

Given the industry's commitment to ensuring data management is conducted in line with world best practice, RICA also supports the introduction of a Privacy Impact Assessment (PIA) and is confident that the completion of a PIA will be readily adopted within the current scope of practices, with certain steps of the PIA already undertaken and understood by members.



Furthermore, keeping in mind the time constraints that apply to a great deal of research and the impediments regarding the current Scheme, ongoing or continual authorisation to an approved research body for permitted research will result in significant cost savings for government and reduce the administrative burden placed on ACMA. (RICA notes that a former Department of Communications and the Arts Report Case Study: *The process of acquiring access to the IPND*, documented a six-month research project timeline, which would render it unsuitable for most government and market research projects due to the need to obtain more timely evidence on which to base decisions).

#### FACILITATING GREATER RESEARCH INDUSTRY MANAGEMENT OF RESEARCH ENTITY ACCESS TO CONDUCT PERMITTED RESEARCH

ACMA Consultation paper: *The proposed arrangements in the draft IPND Scheme 2017 for facilitating greater research industry management of access to the IPND (see Part 4).*

RICA has long championed the proposed model (Figure 1) of having an Authorised Holder in place to access (limited) de-identified IPND data to support accurate, high quality research as specified by the Minister. RICA believes this change will bear significant cost savings for government, reduce any administrative burden and (with the inclusion of listed and unlisted numbers) save on unnecessary calls made to the Australian public.

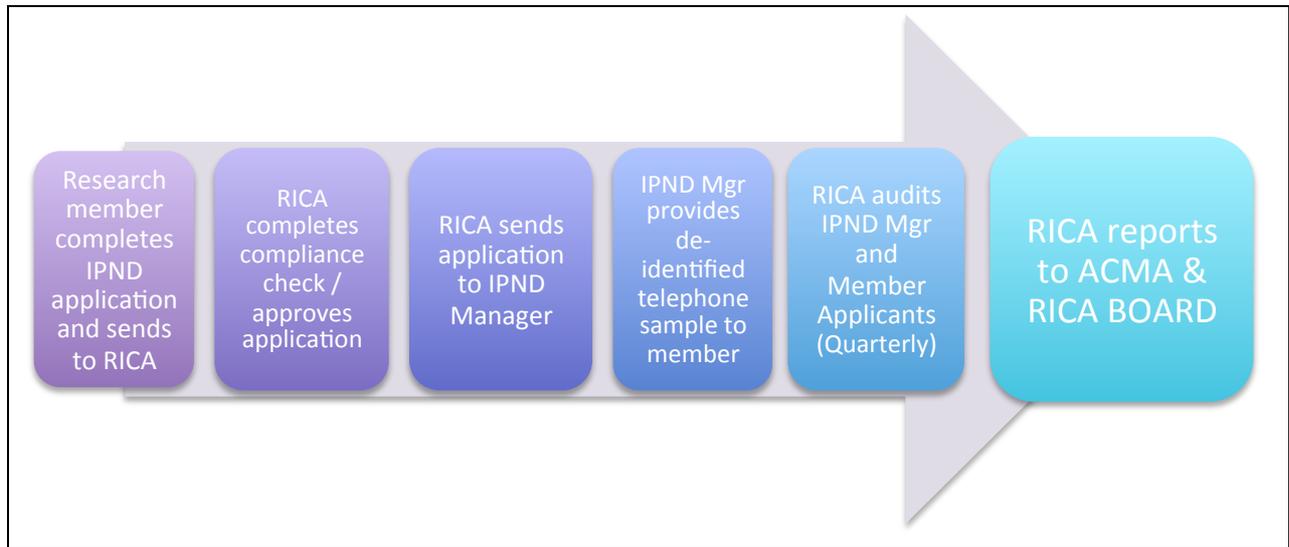
As illustrated previously, AMSRO and AMSRS members have a long and successful track record of operating in a co-regulatory environment with members recognising that the industry's integrity and longevity relies heavily in maintaining the trust and willingness of the Australian public.

Research undertaken by AMSRO/AMSRS members is largely de-identified (our members are not interested in names but more so in the aggregated data). RICA proposes that if 'greater industry management' is approved in the proposed Scheme, that we would engage a trusted and experienced sample provider to process research (member) applications to ensure complete data security and streamlined provision of de-identified data without excessive set up and IT fees. This process is similar to the current management of the industry Privacy Code and would require RICA, as the Authorised Holder of IPND responsible for member compliance across the system. The member applicant would only receive the phone number, and a broad level geographic identifier relevant to the survey request. For example, the data provided may contain just two fields – the number, and the geography such as 'Electorate X', or 'Council Y', or 'Postcode Z' which ensures there is no possibility of identifying an individual, or a specific address in a sample.

Under the new Scheme, RICA proposes that all members seeking access to de-identified data for certain types of research specified in the Scheme, be required to complete a pro-forma to ensure the project meets the research criteria as stipulated by the IPND Scheme and meets all ACMA and industry compliance requirements. Similar to the industry privacy code, RICA would incorporate training and a regular (project) audit process to ensure member compliance.



An example of RICA's proposed IPND member application process follows:



Additionally, research needs to be undertaken in a timely fashion to meet a client needs. RICA therefore supports the ongoing access via a standing authorisation rather than case-by-case application process and believes this change will significantly reduce costs and any administrative burden on the ACMA. By way of example, Market Research Organisation National Field Services reported using telephone lists/sample 40 times in 2015 and the Social Research Centre 70 times. This company data represents only two of the larger, top 10 research call centres operating in Australia. RICA is therefore confident that the ACMA would receive anywhere between 200-400 IPND application requests per year.



ACCESS TO DE-IDENTIFIED IPND DATA BY RESEARCHERS VIA ACMA

ACMA Consultation paper: *Whether limiting access to de-identified (anonymised) IPND customer data should apply not only to researchers that obtain IPND data from an authorised research body, but also to researchers that apply directly to the ACMA, outside the proposed industry model.*

RICA represents approx. 80% of market and social research organisations operating in Australia however acknowledges that researchers working outside of the industry body may wish to access IPND data. RICA has always supported the suggestion for on-going, broader **de-identified** access for a wide range of researchers. It is however difficult to gauge how many research applications may be received by ACMA outside of the industry body and whether independent applications will have the required infrastructure in place. As outlined in the consultation paper and this submission, the proposed *Research Body* access model (Figure 1) is underpinned by strict industry compliance mechanisms, including a legally binding privacy code and an industry code of ethics. RICA therefore supports the concept in principal, however independent researcher access to the IPND via ACMA (outside of the AMSRO/AMSRS membership base) needs to be assessed in terms of having an adequate compliance structure in place.

ADDITIONAL COMMENT REGARDING IPND COST

RICA supports having operational costs funded by data users and believes this represents an efficient allocation of costs. We propose however, that research applicants sourcing the IPND (de-identified, limited data via an Authorisation Holder /IPND manager) are charged at the marginal cost per unit of provision to prevent high access costs and therefore avoid cost becoming a barrier to access (i.e. under the current IPND cost structure access to the full IPND dataset would cost approximately \$650,000).

If access to the IPND can be negotiated at a reasonable fee, and it could be swapped in to replace existing directory sources, there would be minimal increase to research costs, and little or no impact on RICA, or other bodies. Sample provision would continue on a commercial 'user pays' basis from the sample provider. It needs to be clarified that while the research industry would not be provided with a large volume of numbers annually, the entire IPND is needed as a seed data source to create the random samples, which would be a very small subset.

CLOSING COMMENTS - IPND REVIEW REPORT (DECEMBER 2015) RECOMMENDATION 4<sup>2</sup>

THE INCLUSION OF UNLISTED NUMBERS IN THE IPND SCHEME 2017

Research provides a critical input to decision-making that drives product and service innovation, productivity increases and economic efficiency.

Since the commencement of the IPND Review, over five years ago (November 2011), the market and social research industry has continued to face a rapid decline of Australian households with landline ('fixed') telephone services and a rapid increase of mobile only (or unlisted number) use.

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<sup>2</sup> Department of Communications and the Arts -IPND Review Report Implementation Plan (December 2015)



As the mobile-only population continues to grow and the number of households with landline phones continues to decrease, a very significant demographic of the population is currently unlisted and unavailable via existing IPND arrangements for important telephone survey research. The rapid growth in the numbers of mobile-only households seriously erodes the research industry's ability to provide accurate and effective telephone survey research for government and business clients. Effective research must be based on good scientific sampling. Without the implementation of ACMA's proposed model (Figure 1) for a wider range of researchers to access **de-identified listed and unlisted** IPND information via an Authorised Holder (Research Body), the potential economic impact is now very significant, with thousands of public, not-for-profit and private sector organisations who depend on accurate research data to inform critical investment and resource allocation decisions, at risk.

Social surveys are used in Australia to identify and measure community attitudes, which then inform government policy and commercial business decisions. RICA figures show that the use of telephone research methodology accounts for nearly one-third of all quantitative research conducted in Australia with an approximate annual value of \$220M<sup>3</sup>. Therefore, telephone research remains a principal method in which to capture the attitudes of the Australian public and the reliability of that research depends on accurate sampling frames.

Government clients **require** the research industry to use randomly generated telephone numbers (RGN) when undertaking general community telephone surveys. This requirement is for the express purpose of reaching persons only available via unlisted (landline and mobile) numbers. To do otherwise means that telephone based industry, government and academic research will be biased and unrepresentative and as a result, seriously flawed. When one considers the important uses made of telephone survey data, the implications of needing to rely on poor quality survey estimates are potentially very profound.

As mobile phone numbers are unlisted by default, as the volume of mobiles in the community and 'mobile only' (no landline) households grow exponentially, a very significant demographic is currently unlisted, and unavailable for important research.

To create an accurate sampling frame (and include people from mobile-only households), research organisations are required to purchase randomly generated phone numbers (Random Digit Dialling or RDD lists). The lack of any geographic markers for randomly generated mobile phones and the availability of only a crude location information for randomly generated landline numbers means that telephone interviewers are required to contact thousands of people unnecessarily (per research project) with the aim of building accurate telephone sample frames specific to a particular (project) geographical area. RICA's proposed IPND limited access model overcomes this problem by providing a high level of geography for IPND telephone numbers.

The current mechanism to include unlisted numbers in a sample is complex and inefficient, and contributes to higher costs on industry and government, along with less precision in research.

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<sup>3</sup> RICA Industry Survey 2014 - Turnover by research method: Quantitative methods account for the major part of turnover: 79% in overall terms. Online (34%) and CATI (31%) are the principal methods.



The process involves numbers (both landline and mobile) being generated randomly via a variety of algorithms, and these numbers are then tested for 'live' status. With mobiles, obviously no geography is known, and with landlines only a very rough assignment occurs via number prefix and likely associated telephone exchange (but this is of decreasing utility with the increase in digital numbers and exchanges). Also, the status of the number – business, residential, government, fax, etc. is unknown.

When RGN are used, the client research cost is increased by:

- Cost of generating the sample;
- Cost of testing the sample;
- Cost of extra telephone interviewer screening time devoted to determining the geography of the called number through questioning the subject;
- Cost of extra telephone interviewer time devoted to determining the status (business, residential, etc.) of the called number through questioning the subject;
- Cost of increased call centre staff, time and call charges;
- Cost of decreased precision in research.

It is not unusual for thousands of numbers to be generated for a particular range to get a single live number – clearly inefficient and costly. It is also the case that undertaking many thousands of calls to determine whether or not a randomly generated mobile phone number belongs to a person within the prescribed geographic area for a particular study (e.g. State / Territory) generates a considerable public burden / nuisance factor. This considerable public burden would be removed under the RICA IPND limited access model.

As evident in the project example following, if the Government were to introduce an IPND limited access model that includes both listed and unlisted numbers (as proposed by RICA), this would enable research organisations to more effectively sample mobile only households in a far more accurate and cost efficient manner with less unnecessary bothering of the population. *i.e. The State based project below shows 2,569 people were contacted however did not match the required profile and an additional spend of approximately \$20,000.*

The result for government would be a more robust and representative sampling option for these types of projects at a far more competitive price than previously possible.

Furthermore, with access to de-identified IPND data, we envisage uplift in telephone research work being commissioned meaning more consistent and reliable work for casual interviewing teams across the industry.

See case study over page.



## CASE STUDY 1 – FIELDWORK COST COMPARISON /NO IPND MOBILE ACCESS versus IPND MOBILE ACCESS

Project specification:	Victorian residents aged 18+  30% mobile only households  Minimum quotas on 6 age gender calls (M/F – 18-34/35-54/55+) set to 65% of population proportions	
Sampling Method	RDD Mobile + landline top up	Access to geo-tagged IPND listed mobiles + landline top up
Estimated unnecessary Termination on Location	2569 contacts	None*
<ul style="list-style-type: none"> <li>• <b>Government cost saving on this project: \$30,800</b></li> <li>* Dependent upon the quality of the geo-tagging of mobile numbers)</li> </ul>		

A case study involving a State Government Health Survey follows to further illustrate the profound impact that having access to geographically targeted mobile phone numbers would have on the efficiency of undertaking geographically targeted telephone surveys using mobile phone numbers.

## CASE STUDY 2 – A STATE BASED HEALTH SURVEILLANCE SURVEY

For almost 20 years many State governments across Australia have undertaken state-specific health surveillance surveys via Computer Assisted Telephone Interviewing. These surveys are an important part of Australia's population health surveillance capacity and provide important insights into the determinants of chronic disease and how public health interventions can be better targeted. Such surveys provide trend data for key health indicators such as diabetes, smoking prevalence, and overweight and obesity.

Increasingly these surveys have had to combine calling mobile phone numbers in addition to landlines in order to reach a representative sample of the population and include those segments of the population that are mobile-only (e.g. younger people, males, Aboriginal people, people born overseas, single people, renters, etc.). Not having access to geographically tagged mobile phone numbers has added considerably to the cost of mounting such surveys.



By way of example, field statistics from one of these surveys show that:

- To undertake the survey approximately 87,000 mobile phone numbers were generated and sent an advance text message in a first attempt to identify residents of that State. Based on population statistics, some 65,000 of these contacts were unnecessary;
- In response to this text message, approximately 24,000 individuals identified themselves geographically out-of-scope and opted out from the survey and a further 20,000 identified as out-of-scope when subsequently called by an interviewer.

Relative to the cost of mounting this survey using geographically coded mobile phone numbers, the additional cost incurred by the State for mounting this survey using mobile phone numbers without any geographic coding was more than \$100,000 (adding approximately 25-30% to the cost of mounting this survey).

Considering all of the geographically targeted dual-frame telephone surveys being undertaken in Australia, the potential savings to survey funding agencies, the largest of these being the Commonwealth Government, which would arise from gaining access to geographically coded mobile phone numbers is very substantial indeed.

In closing, thank you for providing this opportunity to comment. RICA welcomes the proposed reform and looks forward to our discussions with government to further develop and implement a Research access model that benefits the government, industry and ultimately, the Australian public.

For further information:

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