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CDR in the telecommunications sector

AGL Energy (AGL) welcomes the opportunity to provide feedback on the Federal Treasury Consumer Data Right in the Telecommunications Sector: CDR rules and standards Design Paper.

AGL is a leading integrated essential service provider, with a proud 184-year history of innovation and a passionate belief in progress – human and technological. Following the purchase of the Southern Phone Company (SPC) in 2019, AGL entered the telecommunications industry to become a multi-service retailer to Australian consumers.

AGL has consistently supported the CDR, including its application to the telecommunication sector as we recognise the likely benefits it will generate for Australian consumers. We provide feedback on the Design Paper based on our experience in implementing the energy CDR rules and ensuring as much alignment as possible between energy and telco sector specific CDR rules.

Users without online access

The Federal Government consider CDR to be a fundamental pillar of the Digital Economy Strategy. The CDR eco-system is based on the digital real time sharing of consumer data in a secure environment. Based on this principle, we do not believe off-line customers should be considered eligible CDR consumers.

The precedent has been set by banking, that customers need to be registered digitally to participate in CDR. This should be the default for every other industry. There clearly is a convergence occurring across sectors with telecommunication providers becoming energy service providers, energy retailers becoming telecommunication providers and banking also providing energy services. Keeping in mind this convergence and considering the customer experience, a different approach on whether off-line customers are considered eligible and if so, how they are treated, especially if they share CDR sectorial data sets to an ADR would lead to a very poor experience.

If Federal Treasury decide to define off-line customers as eligible (not AGL's preferred approach), then we recommend that the rules require offline users to create an online account if they wish to become a CDR consumer. This should be the same approach for eligible off-line energy CDR consumers. This will ensure multi-service providers, such as AGL, only need to build one solution and therefore ensure implementation and CDR on-going compliance costs are minimised while also ensuring CDR offline consumers have the same customer experience regardless of the data they share with an ADR.



Implementation

AGL supports a staged implementation of CDR in the telecommunication sector. We support a phased approach because we believe this most appropriately balances the cost of implementation with ensuring the integrity of consumer data is not compromised by allowing telecommunication data holders sufficient time to make the necessary changes to processes and systems.

We believe the proposed three staged implementation approach outlined in the Design Paper, where providers will be required to introduce telecommunication CDR data sets based on business size and complexity of data sets, will best achieve this objective.

Further, based on our experience with implementing energy CDR, we strongly recommend that phase 1 should begin at a minimum 18 months after the final telecommunication rules are made. Phase 2 should be no less than 6 months after the start of phase 1; and phase 3 should commence no less than 12 months after the start of phase 2.

If you would like to discuss our response, please contact Dougal Heath on 0479 172 696 or dougal.heath@southernphone.net.au.

Yours sincerely

(signed for electronic transmission)

Con Hristodoulidis

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