



**SUBMISSION TO NUMBERING: CUSTOMER LOCATION INFORMATION AND  
NUMBERING DATA CONSULTATION PAPER NUMBER TWO**

18 March 2011

**Introduction**

The Association of Market and Social Research Organisations (AMSRO) is the peak representative body for market and social research organisations in Australia.

The Australian Market and Social Research Society (AMSRS) is the peak representative body for individual market and social research professionals.

AMSRO has 90 member organisations, representing approximately 75 per cent of total employment in the industry. The industry turns over about \$750 million annually and employs more than 10,000 full-time-equivalents in Australia, including 4,100 full-time professionals.

AMSRS has 2,100 individual professional market and social researchers as members. AMSRS members are bound to observe the Code of Professional Behaviour, which provides an ethical framework for conducting and reporting market and social research.

*Together, the peak bodies represent the industry in Australia and work to promote understanding of market and social research, help set and maintain the highest ethical and technical standards, and represent the industry's interests in the regulatory and legislative sphere.*

**Numbering: Customer location information and numbering data Consultation Paper number two**

AMSRO and AMSRS would like to thank the Australian Communications and Media Authority (ACMA) for the opportunity to comment on the Department's January 2011 Consultation Paper, *Numbering: Customer location information and numbering data*.

Professional market and social research is a critical part of quality policy development and business decision making for government, corporate and not-for-profit Australia. The ability to conduct quality scientific sampling in a cost effective manner for quantitative research is currently dependent on the industry being able to utilise a system which identifies a number as being from a geographical location. Without this additional information, quantitative phone sampling will incur excessive additional costs to ensure important research studies meet geographical quotas.

This submission explains why the shift away from geographical numbering, without an attendant provision of additional locator information, will place a commercial burden on the market and social research industry and increase the cost of research to Australian society, while at the same time potentially reducing the accessibility of quality research to organisations which cannot afford this additional cost.

A secondary concern for the market and social research industry is that the increasing prevalence of convergent technologies such as mobile devices, VOIP systems, etc would indicate that there is a need to focus on more technology-agnostic unique identifiers in the future, such as IP addresses. We have explored the implications of convergent technologies more fully in our submission to the ACMA Review of the Telemarketing Industry Standards (January 2011).

As mentioned in our submission to the Department's October 2010 Consultation Paper 1, *Numbering: Structure of Australia's telephone numbering plan*, we have already had to make adjustments to the way in which some market and social research is conducted to allow for these improvements in technology. We advocate that changes to the structure of Australia's telephone numbering plan should allow for convergence while also providing

certainty for those industries requiring location information for numbers, such as emergency services and, to a less geographically-precise degree, market and social researchers.

For the purposes of the Consultation Paper, we propose to restrict our input to two key areas: the ability to access the holdings of numbering data and the removal or reduction of geographic significance in telephone numbers.

### **AMSRO and AMSRS Submission**

Question 2 Would there be any value for organisations with a legitimate interest in the holdings of numbering data – outlined in Table 4 and Table 5 – being able to access such data via a single or a limited number of entry points? If so, how feasible would it be to provide such a means of access, who should operate access to the entry point and under what conditions should access be permitted?

What alternative approaches could be adopted to meet policy objectives?

AMSRO and AMSRS are of the view that there is value in allowing the market and social research industry access to the Integrated Public Number Database (IPND) as outlined in Table 5. We are seeking access to de-identified IPND data only (i.e. phone number combined with a street name, suburb and postcode; no names and no house numbers need be included), provided on a quarterly basis. This data could be easily provided as a ‘snapshot’ of the IPND, rather than ‘live’ unrestricted access.

AMSRO and AMSRS consider that the market and social research industry has a legitimate interest in the IPND. Market and social research exists fundamentally to serve the greater public good. For Governments and political parties, it illuminates the needs and attitudes of citizens to help inform policy development and decision-making. Government is the biggest single buyer of market and social research and therefore would seem to have a clear interest in ensuring that research quality is increased and affordability maintained by access to good location-based sampling. Meanwhile, market and social research supports the improvement of commercial products and services by advising companies what their customers want.

Research indicates that Australians understand the value of genuine research. Even people who are listed on the Do Not Call Register are as willing to participate in research as other members of the general public.

The current legislative and regulatory framework allows usage of the IPND to obtain numbers and related customer details for research (Table 7). It imposes, however, significant barriers to accessing the IPND. These barriers, while reasonable for the purposes they were designed to achieve, are not reasonable in the context of survey research where the identity of the respondent is not required (and is in fact protected by both our professional codes and Commonwealth privacy legislation).

At present, all applications to access the IPND must be made on a project-by-project basis. This is an extremely time-consuming and costly exercise that is impractical for commercial organisations that may undertake several hundred research projects in a given year. Projects often requiring quick turn-around for clients like government, which the current accessing procedures for the IPND makes utilising the public resource impractical or impossible.

This has the effect of excluding the vast majority of market and social research providers from access to truly accurate and inclusive sample. This represents an impediment to effective research for business, not-for-profit organisations and government clients.

As the peak industry associations for market and social research, AMSRO and AMSRS propose that they manage industry access to the IPND. This would ensure a scheme whereby IPND access is only granted to legitimate researchers who adhere to the strict individual and company standards developed and enforced by the Associations, including ISO20252 accreditation. These standards also require strict adherence to the relevant privacy regulations.

We are willing to explore more fully the details of managing access, the conditions and protocols for such access with ACMA at any time.

Question 3 How important is the current ability to obtain information about the location of a caller or a called party? Will that change in future?

Geographic information on the location of a called party is vital to the conduct of market and social research.

Effective research for business and government relies on good, scientific sampling. The essential requirement for any survey required to represent the population of interest is that every member of that population must have a known, 'non-zero' chance of selection. In other words, every phone number, including mobiles, must have the chance to be selected to participate in market and social research in order to ensure a statistically valid sample. This is especially important in light of the convergence review and the possible introduction of unique IP addresses for all contact numbers in the future.

Integral to this requirement is that samples are drawn so as to represent, in their correct proportions, all the geographic locations of potential respondents. Currently, this sampling relies on the geographic identification in the telephone number, as does any sampling of a particular geographic area, such as an electorate or local government area. The Market and Social Research industry needs some certainty on this issue to allow for planning into the future. Market and social research conducted via the telephone is estimated to represent only 26% of all revenue of market and social research conducted in Australia in 2009 (figure based on a survey 'Australia Market and Social Research Industry 2009' conducted by AMSRO and AMSRS in March 2010). Research conducted for governments typically involves a much higher proportion of telephone interviewing, and accurate geographic identification is essential to this work.

Examples of market and social research where accurate geographic representation of the population of interest is vital include:

- a) National population health studies, measuring such important issues as the health status of the population, the usage of prescription medicines or the incidence of obesity, for the purpose of government policy or funding.
- b) A survey of the public's bushfire preparedness needs to identify people who live along potential bushfire corridors.
- c) A survey to identify potential demand for a new shopping centre, public transport service or motorway, in which people within a certain radius of the proposed facility need to be identified for inclusion in the research.
- d) A survey of voting behavior in marginal electorates.
- e) Telephone-based recruitment for qualitative research purposes – group discussions or in-depth interviews – as participants are usually required to attend a central location.
- f) A healthcare company developing a new medication for a tropical disease may want to talk to people living in the tropical parts of Australia to assess attitudes toward the proposed new medication.
- g) The Digital Tracker Survey conducted by the Department of Broadband, Communications and the Digital Economy, which measures the uptake of digital television awareness and attitudes towards the switchover to digital TV in specific geographic areas. This type of research would not be possible without the ability to link telephone numbers with geographic locations. More information on the survey is available at <http://www.digitalready.gov.au/publications.aspx>.

In addition to the inability to define a good scientific sample, a further consequence of removing the link between geographic location and telephone number is the inability to locate people in specific geographic areas. This leads to the need to survey a broad population of people in order to locate those people who qualify for the survey. For example, in the example of the bushfire preparedness survey, contacting all people to locate the small proportion of people living in bushfire corridors.

This is unnecessarily burdensome to people who are contacted, since the majority who agree to participate will, in fact, not qualify.

This will lead to higher costs for conducting the survey, as a greater number of people are contacted and screened for qualification, and is also more intrusive. This is an ineffective deployment of resources and may also put the cost of market or social research out of reach for some organisations or government departments.

AMSRO and AMSRS request that ACMA consider the importance of geographically identifiable phone numbers to the Market and Social Research Industry. The ability to link phone numbers, including mobiles, to a geographic area at the post code level, as an absolute minimum, is vital to the industry and to the integrity of the research it produces. If the direct link is to be broken, then some other authoritative means of linking numbers to their location will need to be made available to the Market and Social Research Industry. Some limited form of IPND access is the simplest way to achieve this.

Any move to reduce the geographic information associated with a phone number makes the conduct of sound, good quality market and social research via the phone more expensive to government and business, and more difficult, for the reasons outlined above.

The need for accurate geographically tagged telephone numbers for research purposes may make it necessary for Government to provide professional market and social research organisations with broader access to the IPND because it allows for geographic sampling.

AMSRO and AMSRS request that ACMA considers the importance of geographically identifiable phone numbers for the conduct of market and social research.

## **Summary**

To summarise, AMSRO and AMSRS are seeking limited access to the Integrated Public Number Database (IPND), on behalf of our members, to ensure that samples used in market and social research via the telephone are as representative of the population as possible. Specifically, de-identified, quarterly snapshots of the IPND, to which access is appropriately regulated by the industry body. Such data would not represent a privacy risk as no personal information is attached to the numbers. Also it is not an expensive request, as there would be no requirement to maintain or update information back into the IPND following use for research.

The “undertaking of approved research” is already an approved purpose for accessing the IPND. AMSRO and AMSRS are seeking to extend the interpretation of the “approved research” category to research conducted by an ISO 20252 certified market and social research organisation.

There is a strong and sustainable public interest case for allowing access to a limited quarterly snapshot of the IPND. This would provide researchers with high quality, representative research samples and would maintain consumer privacy by not disclosing consumer names or house numbers.

A link between telephone numbers and geographic location is vital for the conduct of good quality market and social research conducted via the telephone.

It does not matter whether that link is embedded in the telephone number, as it now is, or attached to it in another form. For example, the Integrated Public Number Database (IPND) has the capacity to enable geographic sampling.

For further information please contact:

Jane Gregory  
Executive Director AMSRO

Mob +61 408 633 321

Ph: +61 2 9552 4618

Email: [jane@amsro.com.au](mailto:jane@amsro.com.au)

Level 1, 3 Queen Street, Glebe NSW 2037