



**SUBMISSION TO NUMBERING: STRUCTURE OF AUSTRALIA'S TELEPHONE
NUMBERING PLAN CONSULTATION PAPER NUMBER ONE**

3 December 2010

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: Structure of Australia's telephone numbering plan Consultation Paper number one

AMSRO and AMSRS would like to thank the Australian Communications and Media Authority (ACMA) for the opportunity to comment on the Department's October 2010 Consultation Paper, *Numbering: Structure of Australia's telephone numbering plan*.

Generally, AMSRO and AMSRS recognise the changes that are already occurring in the way that communications services are used and provided, to which ACMA refers. We have already had to make adjustments to the way in which some market and social research is conducted to allow for these changes.

For example, the rise in mobile phone only users, which are not published, limits our ability to access certain demographics in market and social research, particularly young people who are most highly represented among mobile only users.¹

For the purposes of the Consultation Paper, we propose to restrict our input to two key areas: the removal or reduction of geographic significance in telephone numbers and the conversion of number ranges currently used for mobile services to flexible and general purpose numbers.

¹ ACMA, Young adults leading trend away from fixed-line phones, 18 November 2010
http://www.acma.gov.au/WEB/STANDARD/pc=PC_312366

AMSRO and AMSRS Response to Questions

Geographic numbers

Question 4 What information conveyed by geographic numbers is of value to end-users?

- 4.1 Market and social research is a significant user of geographic numbers. Geographic identifiers are vital to the conduct of market and social research conducted by the three levels of government and industry.
- 4.2 Market and social research conducted via the telephone is estimated to represent 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.
- 4.3 Effective research for business and government clients 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.
- 4.4 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.
- 4.5 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>.

4.6 In addition to the inability to define a good scientific sample, the 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.

It also leads to higher costs for conducting the survey, as a greater number of people have to be contacted and screened for qualification. 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.

4.7 Consequently, 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 geographic area at post code level 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.

Question 5 Does the list of uses of information conveyed by geographic numbers in Table 2 encompass all of the major uses of this information by carriage service providers and end-users?

5.1 AMSRO and AMSRS are of the view that the list of uses of information conveyed by geographic numbers in Table 2 does not encompass all major uses and end users.

AMSRO and AMSRS consider that market and social research should be included as an end-user of geographic numbers in Table 2. The conduct of good quality market and social research via the telephone is dependent upon access to accurate geographically-tagged telephone numbers. Reasons are outlined in our response to Question 4.

Question 6 What advantages and disadvantages would be associated with the proposed efficiency improvement of removing sector partitions in major metropolitan areas?

6.1 Removing sector partitions would have an extremely negative impact on the conduct of market and social research. The conduct of good quality market and social research via the telephone is dependent upon access to geographically-tagged telephone numbers.

6.2 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.

6.3 This would also be more intrusive to the population, and more expensive, as more calls are required to generate a geographically representative research sample.

6.4 Regional and remote communities may be excluded from research, as it will be extremely difficult to form an appropriate sample.

6.5 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. The IPND has the capacity to enable geographic sampling.

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

Mobile numbers

Question 10 What reasons are there for retaining a separate number range for mobile services, other than signalling the higher cost of calls to mobile phones compared with the cost of calls to landline phones?

10.1 AMSRO and AMSRS see no reason to retain a separate number range for mobile services, provided:

- a) The presumption that mobile numbers are unpublished is dropped; and
- b) Geographic identifiers for mobile only subscribers are available at postcode level.

10.2 We support the conversion of mobile numbers to flexible numbers, if this means that the numbers are available on the same basis as geographic numbers are now, as a published listing. This would facilitate the contact, for research purposes, of people and households who only use a mobile phone, which is approximately 14% of the population.² Young people are most heavily represented in this growing group which currently runs the risk of being excluded from research because there is no published listing of mobile numbers.

10.3 Our earlier comments about the need for geographic information attached to the telephone number apply, in particular those comment made at dot point 4.7.

Summary

To summarise, 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.

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.

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.

At present, all applications to access the IPND must be made on a project-by-project basis. This is a very time-consuming and costly exercise that is impractical for commercial organisations that may undertake several hundred research projects in a given year.

² ACMA, Young adults leading trend away from fixed-line phones, 18 November 2010
http://www.acma.gov.au/WEB/STANDARD/pc=PC_312366

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.

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 street numbers.

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