

29 March 2022

Department of the Treasury / Data Standards Body  
Langton Crescent  
PARKES ACT 2600

*via email: [data@treasury.gov.au](mailto:data@treasury.gov.au)*

Dear Sir/Madam

**Consumer Data Right (CDR) – telecommunications sector – CDR rules and standards design paper**

We continue to support the introduction of the CDR into the telecommunications sector.

In light of the preliminary estimates<sup>1</sup> of substantial upfront costs for smaller providers in the telecommunication sector we support the proposal for them to be able to choose whether they opt in to participating in the CDR. Furthermore, they should be able to do so either for product data, or consumer data or both. Smaller providers that are early adopters of the CDR in the telecommunications sector should be actively supported by:

- financial incentive;
- targeted training and support; and
- public awareness campaigns , including promoting the benefits of use cases created through the CDR.

Large providers in the telecommunication sector however should be mandated to participate in the CDR given most consumers of telecommunications services are their customers. The threshold should align with an existing delineation, such as that noted in the consultation paper from the Telecommunications (Consumer Complaints) Record-Keeping Rules 2018.

We suggest that initially at least, all types of enterprise customers be excluded from the definition of eligible consumer for the telecommunication sector. If it is not practical for enterprise customers to be identified on their face, then we support the use of a proxy such as that provided in the Telecommunications Consumer Protections Code.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Mike Kearney on 02 5114 6119 or at [michael.kearney@asbfeo.gov.au](mailto:michael.kearney@asbfeo.gov.au).

Yours sincerely



**The Hon. Bruce Billson**  
Australian Small Business and Family Enterprise Ombudsman

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<sup>1</sup> Consumer data right: Telecommunications sectoral assessment, Final report, November 2021