



Manager  
Education and Telephone Content Section  
Australian Communications and Media Authority  
Via email: [NewContentRegulation@acma.gov.au](mailto:NewContentRegulation@acma.gov.au)

November 2007

### **Re: Restricted Access Systems Declaration**

Thank you for the invitation to comment on the draft Restricted Access Systems Declaration.

#### **About CTN**

The Consumers' Telecommunications Network (CTN) is a national peak body of consumer and community organisations, and of individuals representing community interests, who participate in developing national telecommunications policy. We advocate policies for better access, quality of service and affordability of telecommunications facilities for all residential consumers. CTN's members are national and state organisations representing consumers from non-English speaking backgrounds, deaf consumers, Indigenous people, low income consumers, people with disabilities, young people, pensioners and superannuants, rural and remote consumers, women and consumers in general.

#### **General comments**

The draft Determination seems generally comprehensive. We suggest ACMA give further consideration to the following issues.

- The note in Section 5 suggests that ACMA may test a restricted access system to establish compliance; is there a need to specify in the Declaration itself that access to a Restricted Access System (RAS) must be made available to ACMA for this purpose?
- There is a broader issue of what role ACMA will play in assisting to ensure that RAS developed are actually going to meet the requirements of the Determination, which offers a fair degree of flexibility. It would be useful if ACMA could clarify how it will provide guidance to those responsible for the creation of an RAS with a view to preventing inadequate systems

being developed and requiring amendment at a later point. Will ACMA offer approvals of a proposed RAS?

- Age verification; It should be recognised that proof of identity documents cannot be acquired by people under 16 in some Australian states and territories, which may affect the ability of consumers to access 15+ content.
- What kind of penalties and enforcement actions are available to ACMA in cases of repeated breaches of the RAS Declaration? This should be included in the Declaration itself.

Thank you once again for the opportunity to comment and to have our points taken into account. Should you wish to discuss this response in more detail please contact myself or Sarah Wilson at the Consumers' Telecommunications Network on 02 9572 6007 or at [ctn@ctn.org.au](mailto:ctn@ctn.org.au).

Yours sincerely,



Teresa Corbin  
Chief Executive Officer

This submission was prepared by Sarah Wilson, CTN Policy Advisor, and Teresa Corbin, CTN Chief Executive Officer. It was approved out of session by the CTN Board.