



TELSTRA DISCUSSION PAPER
SMS charges

HREOC FORUM
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Recommendation 17: SMS charges

Telstra welcomes the opportunity to participate in the Human Rights and Equal Opportunity Commission Forum and to provide some comments on the discussion paper commissioned by HREOC, *When the Tide Comes In: Towards Accessible Telecommunications for People with Disabilities in Australia*, released in July 2003.

The discussion paper notes the usefulness and popularity of SMS for people who are deaf. The paper recommends that HREOC should consider convening discussions with AAD, Deafness Forum and industry representatives concerning the price of SMS calls for people who are deaf or hearing/speech impaired. The purpose of discussions would be to review SMS charges as compared with the cost of voice calls, whilst having regard to the objective of the DDA to ensure non-discriminatory access to goods, services and facilities by requiring reasonable adjustments unless an unjustifiable hardship would result.

SMS Background

Like voice calls, SMS is a form of communication which has practical advantages and disadvantages. It provides an opportunity to communicate without speech but is limited in message length. Price comparisons between SMS and voice calls are also problematic. If a person makes a 10 second voice call on a \$20 Telstra Mobile Plan, they will pay 47c plus a 25c call connection fee. If they send a standard SMS to a GSM phone (160 characters) will pay 25c to send the message. Depending on the circumstances, it may be cheaper for a customer to send an SMS than to make a voice call. There are also several promotional opportunities and plans where customers can pay less than 25c, for example the SMS Bonus option (50 free SMS) on the current Telstra Mobile Plans (see below).

Telstra's SMS pricing

As a general position, Telstra does not believe that its pricing for SMS calls is discriminatory.

- (i) Telstra's post-paid plans (eg. the consumer Telstra Mobile Plans, Telstra Direct Plans, Telstra Mobile Business Plans) involve a minimum level of "included calls" per month for both voice calls and SMS. Hearing or speech impaired customers are able to obtain the same benefit from the included call component of post-paid plans as voice call users. Member customers on the consumer Telstra Mobile Plan (fixed term contracts) can also select a "50 free SMS bonus option".
- (ii) Telstra also offers a communic8 postpaid SMS plan tailored for SMS users. Customers can choose a 12 month subscriber plan (and get a choice of a bonus option) or month to month casual plan. Under the communic8 SMS plans customers can send SMS for 15 cents to communic8 and Telstra mobiles and 18 cent SMS to any other network (or 20 cents in the case of customers on \$10 communic8 SMS plans). In addition,communic8 SMS subscriber plan

customers can also send SMS for free to communic8 and Telstra mobiles between 9 pm and 5 am. Deaf or hearing impaired customers are therefore not required to subscribe to a plan which is priced to support the offer of a mobile phone voice service.

- (iii) In addition, customers who wish to obtain a pre-paid mobile service can connect to Telstra's communic8 prepaid service. A \$25 starter kit provides \$25 worth of voice calls or SMS and 2 months network access (unused call credits are forfeited) and pre-paid customers only pay for the service used (for example, SMS).

DISCUSSION POINTS

- ▶ The ideal structure for mobile plans for consumers who may be Deaf or speech impaired and rely on SMS
- ▶ Diversity of plans currently available from all service providers