



**Optus Compliance Achievement Plan
Telecommunications Consumer Protections Code C628:2012
(incorporating Optus Networks Pty Ltd, Optus Internet Pty Ltd and Optus Mobile Pty Ltd)**

Optus' commitment to compliance

Optus strives to deliver a brilliant customer experience for our customers. We have recently restructured our business to ensure our customers are at the centre of every product we develop and decision we take. Optus therefore is committed to compliance with consumer protection codes. Optus has demonstrated this commitment over the past decade by becoming a signatory to the previous version of the TCP Code and the majority of its predecessor codes. Our current TCP compliance program builds on those past efforts.

Application of the TCP Code to Optus' products and services

Optus has over 10 million customers who fall within the scope of the TCP Code ("Customers"); the majority on mass market products like our residential post-paid and pre-paid mobile offerings, but also some niche market offerings such as our satellite mobile and broadband products used by consumers in rural and remote areas, and special mobile plans offered to the employees of our large corporate customers. Our TCP Code program has reviewed the full range of consumer products: post-paid and pre-paid mobile and mobile broadband, fixed telephony, broadband and dial-up internet, satellite mobile and satellite broadband services.

Optus also delivers wholesale services to service providers for sale under their own brand. We have been working to ensure that we can provide our wholesale customers with sufficient information so that they can meet their own requirements under the TCP Code.

Optus' Compliance Program

We have made a significant investment so that we can fully comply with the TCP Code. We have had a formal company-wide project team of over 100 people across our various business units involved in checking compliance against every single clause of the new version of the TCP Code, and implementing the required changes across all relevant products and services, customer service and sales channels, billing, networks and IT systems.

Our Compliance Status

Whilst there remain a few items with which we are partially compliant, these primarily relate to one of our niche product offerings – special pricing plans offered to the employees of some of our large corporate customers – rather than our mass-market products. Our corporate employee offers amount to less than 1% of Optus' Customer base. To be clear, this means that the processes, systems and documentation for the products used by 99% of our Customer base are compliant, with the exception of two billing system changes which will take place in June this year. We are extremely proud of our compliance status and of the considerable effort our staff have made to pull together and achieve such a great result.

Compliance Achievement Plan

The below table outlines the remaining Code clauses and obligations with which we have not yet achieved full compliance for all our product offerings. It details the gaps in compliance, what actions we will be taking to rectify those, and the date by which this will be undertaken.

Each of the below activities is being tracked by our internal TCP Code compliance checking program, which will continue to operate until all of these gaps are resolved. There are several layers of governance for this program, and regular progress reports provided to Optus senior management. This ensures a continued focus on TCP Code compliance throughout the business.

We will provide an updated Compliance Achievement Plan in the coming months as the compliance milestones are achieved. On current indications, all outstanding items should be resolved by end June this year.



Code Ref	Clause Sub Heading / Summary	Details of compliance gap	Achievement Plan	Estimated Achievement Date
Optus is compliant with the TCP Code EXCEPT in the limited circumstances below.				
Chapter 4 - Consumer Sales, Service and Contracts				
4.1.3 (i)	International Roaming	Additional information on Roaming needs to be provided on the website for the employees of Optus's corporate customers.	Additional content to be uploaded onto the website.	17 May 2013
Chapter 5 - Billing				
5.3.1(n)	Display on bill a link or information on where to obtain usage information (for included value plans).	The link/instructions to where customers can obtain this information is not currently displayed for employees of Optus' corporate customers.	A change is being made to the relevant billing system to enable this information to be shown on the bill.	30 June 2013
5.4.2(c)	Not bill more than 160 days in arrears	Our main consumer billing system does not currently have automated processes to remove all charge types over 160 days in arrears.	Billing system changes scheduled to resolve this. (Note that this has been implemented for the majority of charge types already.)	30 June 2013
5.7.1(c)	Except where agreed with the customer, they must be provided a minimum of 10 working days to check their bill before their direct debit payment is deducted.	A system error has been identified when a customer chooses to bundle certain existing services, which is automatically resetting the billing date and providing less than the 10 working days required. (Note that this impacts less than 50 customers a month.)	A change is being made to the billing platform to ensure additional time is provided, thereby allowing customers a minimum of 10 working days to review their bill before their direct debit payment is deducted.	30 June 2013
Chapter 6 - Credit and Debt Management				
Chapter 6	Access to Credit Management Information	The information, processes and documents regarding credit & debt management are not yet fully available for employees of Optus' corporate customers. There is minimal impact and potential detriment, given these plans are only available to staff working for	Information, processes and documentation to be finalised in accordance with the Code.	Online updates 17 May 2013. Processes and documents 30 June 2013.



Code Ref	Clause Sub Heading / Summary	Details of compliance gap	Achievement Plan	Estimated Achievement Date
		Optus is compliant with the TCP Code EXCEPT in the limited circumstances below.		
		specific Optus corporate customers.		
Chapter 7 - Changing Suppliers				
7.5.3 & 7.7.1(b)	Advise the customer where their Service cannot be Transferred / Subsequent notification	Employees of Optus' corporate customers are not being proactively contacted if there is a problem with their Mobile number porting request, or to notify them that their port has been completed.	Processes to be developed to proactively contact customers if there is a problem with their porting request, and to ensure they are formally notified that their port has been completed.	31 May 2013

Ends.