

14 October 2022

Lodged by email: data@treasury.gov.au

RE: Consumer Data Right rules - expansion to the telecommunications sector and other operational enhancements

Introduction

iSelect appreciates the opportunity to provide commentary on the Government's draft changes to CDR rules. We are pleased to see the commitment to the expansion of CDR into new sectors and appreciate the Government's ongoing engagement with industry. We see the potential for significant consumer benefit in CDR and welcome the draft CDR Telecommunications rules.

About iSelect

iSelect is one of Australia's leading destinations for comparison and purchasing across insurance, personal finance, and utilities. Co-founded in 2000 by Damien Waller, iSelect grew out of a need to compare complex products in an easy yet accurate way. Our vision is to make Australians' lives easier by saving them time, effort, and money.

At a time when many Australians are struggling with rising prices and cost of living pressures, iSelect is passionate about helping households find a better deal on their bills and expenses. And as prices continue to climb across the board – from interest rates to petrol prices to electricity bills – the service we provide has never been more valuable to our customers.

Each year we help millions of Australians compare an extensive range of products and services across insurance, utilities, and personal finance. We compare a wide range of Australia's leading brands, and our support is provided at no cost to the customer.

Our online presence has long been complemented by our highly experienced team within our Australian customer contact centre. Whilst we know many customers still highly value the ability to speak to someone on the phone, we recognise that the way customers wish to interact with us is changing. We are currently expanding our ability for customers to complete the comparison process online and finalise their purchase in a few simple steps.

We have been around for more than 20 years but are always looking forward. We are excited to continue to evolve both our product offering and customer experience to meet changing consumer needs and preferences.

In addition to our flagship iSelect brand, the iSelect Group also owns energy comparison service Energy Watch.

www.iselect.com.au

Key topics addressed in our submission

iSelect's submission focuses on the following areas/topics, all of which are discussed in more detail below:

1. Datasets
2. Phasing
3. General CDR Maintenance

1. Datasets

iSelect considers the data clusters outlined as broadly consistent with data types required for Telco comparison and switching services.

Given the importance of bundling in the Telco sector, we recommend increased clarity regarding how bundles will be treated. Bundles may include hardware such as mobile handsets or entertainment services that make up the total value of the product or service received.

We understand some details regarding bundled products and services may be included under billing and product specific data. We recommend specificity regarding product data relating to hardware make and model, and usage data relating to entertainment services. Consideration may also be given to how bundles are treated across sectors, given proliferation of bundled energy and telco products.

In line with The Treasury's [submission guidelines](#), please see separate confidential attachment for further analysis of data points required for iSelect to complete a comparison and switching service for an internet or mobile product on behalf of a customer.

2. Phasing

iSelect agrees with the approach to phasings, focusing on major carriers first before the remainder of the market.

Regarding phase one, we seek clarification on the treatment of wholesale providers supported by a carriage service provider included in the first phase of the rollout. For example, we assume belonging as a wholesale partner of Telstra would be excluded from phase one.

Regarding phase two, it is our view that a lower threshold for carriage service providers with 30,000 or more services in operation should be considered. 30,000 services in operation represents a substantial number that if left only as voluntary participants, may preclude many consumers (across the total smaller provider cohort) from leveraging the benefits of CDR.

Those consumer types typically show intent on switching from the larger providers and as such, may otherwise be unable to access more accurate personal data to assist in their purchase decision. Similarly, with CDR enabling greater customer insight, we anticipate more businesses in the smaller cohort will emerge to provide further competition. We believe a lower threshold of 10,000 is appropriate for this category.

3. General CDR Maintenance

iSelect acknowledge and support proposed changes to outsourced service providers. These changes will ensure flexibility in outsourcing arrangements to accommodate CDR use cases, ensuring the consumer experience is optimised, whilst minimising business disruption. We rely on an ecosystem of trusted partners to deliver value via CDR and the proposed changes provide greater ability to rely on outsourced service providers for activities such as sharing data or disclosing data on our behalf.

Further information

Please do not hesitate to contact us should you require any further information or clarification or wish to discuss any of the points raised in this submission in more detail. The best initial point of contact is:

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Conclusion

Thank you for the opportunity to provide our feedback on the draft CDR Telecommunications rules. iSelect is a passionate supporter of CDR and believe the expansion into Telco will be of significant benefit to Australian consumers, particularly in the current environment of rising cost of living pressures.

Kind regards,

A handwritten signature in black ink, appearing to read "Warren Hebard", with a long horizontal stroke extending to the left.

Warren Hebard
CEO, iSelect
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