



6 June 2013

CCAAC Secretariat
c/- The Manager
Consumer Policy Framework Unit
Competition and Consumer Policy Division
Treasury

Via Email: CCAAC@treasury.gov.au

RE: Review of the Benchmarks for Industry-based Customer Dispute Resolution Schemes

ACCAN thanks the Commonwealth Consumer Affairs Advisory Council (CCAAC) for the opportunity to comment.

This review is a welcome opportunity to improve upon the already strong benchmarks. Indeed we would like to place on the record our support for the existing benchmarks. It is as important as ever that key principles such as industry schemes being free of charge to the customer and being accessible nation-wide by those customers with special needs, be enshrined in a best practice framework.

We also wish to support the submission to this review from the Telecommunications Industry Ombudsman, who has described the many positive ways in which each benchmark underpins the operations of the TIO scheme, and the continuing relevance of these benchmarks.

In relation to additions that should be made:

ACCAN would support the addition of a key practice under the benchmark of Independence that requires that industry schemes be 'not-for-profit'.

We would also support the addition of a key practice that industry schemes should not be in competition with each other under the benchmark of Efficiency and/or Independence.

Sincerely,

Jonathan Gadir
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