Report 3

Telstra's compliance with price control arrangements

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1. Background

Under Part XIB, Division 12, paragraph 151CM(1)(b) of the *Trade Practices Act 1974*, the Australian Competition and Consumer Commission (ACCC) must report to the Minister for Communications, Information Technology and the Arts on the adequacy of Telstra's compliance with price control arrangements.

The price control arrangements affecting Telstra for the 2000-2001 financial year are set out in the *Telstra Carrier Charges — Price Control Arrangements, Notification and Disallowance Determination No.1 of 2000*. Under the determination the ACCC has only to ascertain whether Telstra has complied with the price control arrangements. Compliance is a condition of Telstra's carrier licence.

1.1 A summary of price control arrangements

In summary, the price control arrangements apply to one overall basket and three sub-baskets of services as discussed below.

The first basket is the overall basket that comprises connections,[1] line rentals, local calls, trunk calls,[2] international calls,[3] domestic and international leased lines and digital cellular mobile telephone services. This basket is subject to a price cap of CPI-5.5 per cent. The price cap means that Telstra is entitled to change these prices in compliance with the price cap, but the aggregate price of all services in the price cap basket has to decline by 5.5 per cent annually in real terms (that is, net of inflation). If, for example, the consumer price index (CPI) increases by 3 per cent, the nominal price of the basket has to decline by 2.5 per cent.

The second basket comprises line rentals and local calls, and is subject to a price sub-cap of CPI-0, while local call charges can not exceed 22 cents per call. Consequently, any increase in line rental charges in excess of the CPI will have to be balanced by a reduction in the local call charges.

The third basket comprising connection services is also subject to a price sub-cap of CPI-0. This means that the overall revenue weighted price for these services must not rise in real terms in the financial year.

The fourth basket comprises five fixed line services consumed by the lower 50 per cent of residential customers:[4] connections, line rentals, local calls, trunk calls and international calls. The price sub-cap for the fourth basket means that the overall revenue weighted price for these services must fall by 1 per cent, in real terms, in the financial year.

The price cap for the relevant basket in the 2001–02 financial year will be taken to be varied by the unexercised amount of the price cap for the 2000–01 financial year.

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1 Connections require establishing the supply of a standard telephone service at a location required by the person requesting the service. It does not include the supply and connection of a telephone handset or other customer equipment.

2 Trunk calls include STD calls (Telstra's brand name for its fixed network domestic long distance call service), fixed-to-mobile calls, community calls and pastoral calls. They do not include international or local calls.

3 International calls include direct dial and operator assisted calls.

4 Lower 50 per cent is estimated in terms of telephone bills.

Telstra is required to report to the ACCC, before the end of three months after the end of the financial year in which a price cap applies, in relation to its compliance with the price control arrangements.

The determination also provides for a number of other price caps to a range of services.

- The revenue weighted average untimed local call price for residential and charity customers in non-metropolitan Australia in the 2000–01 financial year is not to exceed the revenue weighted average untimed local call price for residential and charity customers in metropolitan Australia in the 1999–2000 financial year by more than 0.4 per cent.
- The revenue weighted average untimed local call price for business customers in non-metropolitan Australia in the 2000–01 financial year is not to exceed the revenue weighted average untimed local call price for business customers in metropolitan Australia in the 1999–2000 financial year by more than 0.4 per cent.
- The price for untimed local calls is not to increase above 22 cents for calls made from a residential or business phone, and 40 cents for calls made from a public phone, except in the case of discount plans when a customer may on occasion be required to pay more than 22 cents per local call. In addition, taking into account the introduction of the GST:
  - a standard retail price for untimed local calls is not to increase because of the GST;
  - Telstra must not increase the prices of any other services with the purpose of recovering the revenue foregone from GST absorption; and
  - Telstra must not reduce the price reductions it otherwise would have been required to make as a result of the determination with the purpose of recovering the revenue foregone from GST absorption.
- Line rentals for lowest-billed residential customers must not increase in a way that their average bill increases in real terms.
- Telstra must notify the Minister in advance if it intends to alter charges for directory assistance services, with the Minister able to disallow the proposed changes if they are considered not to be in the public interest.

2. Methodology for determining revenue weighted price movements

Under subclause 9(3) of the determination, price movements were to be calculated according to a methodology the ACCC established in consultation with Telstra. Following consultations, the *Methodology for administration of the Telstra carrier charges price control arrangements* was established. This framework covers the period July 2000 to June 2001.

Under the methodology the price movement for a component of the basket is defined as a percentage change between the following:

- revenue calculated from usage in period 2 at the standard prices applicable at the end of period 1, less flexi-plan discounts given in period 1;[5] and
- revenue calculated from usage in period 2 at standard prices applicable at the end of period 2, less discounts resulting from specials in period 2 and flexi-plan discounts given in period 2.

Each component service in the baskets will be weighted by post-discounted revenue. That is, revenue calculated from usage in period 2 at the standard price applicable at the end of period 1, after flexi-plan discounts, specials and before standard price changes.

The methodology further provides that where it becomes difficult to measure price changes by calculating the change in standard prices, flex-plan discount, etc. (e.g. where there are information limitations), an alternative method of measuring changes in gross yields may be used. The methodology does not specify how the gross yield should be calculated, leaving the calculation of yield open to inconsistent interpretation.

In previous reports the yield approach was used sparingly. In preparing the current report, however, Telstra applied the yield approach in seven out of eight services subject to the price cap. Telstra submitted that yield approach was more efficient because of increased variety and complexity of pricing arrangements and the difficulty associated with many of these arrangements of separately identifying the standard and flexi-plan prices. The ACCC views that the yield approach may provide a better alternative to the standard price method. However, there are some contentious issues regarding methods used to calculate yields, which the ACCC will address in a general review of the methodology to ensure a consistent, transparent approach for future compliance purposes.

A mathematical illustration of the price movement calculations and related issues is provided in attachment A.

5 Period 1 refers to the previous price cap period. Period 2 refers to the current price cap period.

3. Auditing of Telstra's information

Under subclause 9 of the methodology, Telstra must provide a final audited report to the ACCC, providing full details of its compliance with the price cap requirements, within three months after the end of the price cap period.

The objectives (as set out in the audit guidelines in attachment B of the methodology) of the audit are to determine whether:

- Telstra has met ACCC requirements as specified in the agreed methodology;
- the information produced and supplied by Telstra within the price cap arrangements can be relied upon by the ACCC to undertake its regulatory obligations; and
- Telstra has exercised consistency in applying the methodology specifications to its data capture systems.

In this respect the auditor is required to form an opinion as to:

- whether Telstra has complied with the procedures and policies set out in the methodology;
- the accuracy and completeness of the information produced by Telstra within the structure of the methodology; and
- whether Telstra has followed a structured approach in its compliance with the methodology and whether an audit trail exists.

The ACCC believes that with the noticeable changes in Telstra's approach to calculating price movements for its 2000–01 report, there is a need to ensure that the auditor maintains a high standard of analysis and advice under the methodology. As part of the general review of the methodology, the ACCC intends to seek guidance on sustaining a rigorous auditing process and if necessary implement recommended changes to secure the audit's objectives.

4. Telstra's compliance with the price control arrangements in the 2000–01 financial year

4.1 Summary of Telstra's compliance with the price control arrangements

In September 2001 Telstra provided the ACCC with information about its compliance with the price control arrangements. Having assessed the information, and on the basis of the independent auditor's report, the ACCC is satisfied that Telstra has complied with the price control arrangements for the 2000–01 financial year. The price-cap of CPI-5.5 per cent for the first basket of services and the price sub-caps of CPI-0 per cent for the second and third baskets and CPI-1 per cent for the fourth basket have been satisfied. Telstra has also complied with the metropolitan/non-metropolitan pricing parity requirement for residential, charity and business customers.

It is noted that the overall price decline would have been more pronounced for most baskets but for the significant increase in line rentals. Line rentals has increased by 16.5 per cent during the 2000–01 financial year, which accounted for a weighted average increase of 3.3 per cent for the first basket and 8.9 per cent increase for the second basket. The increase in line rentals also contributed to a weighted average price increase of 5 per cent in the fourth basket.

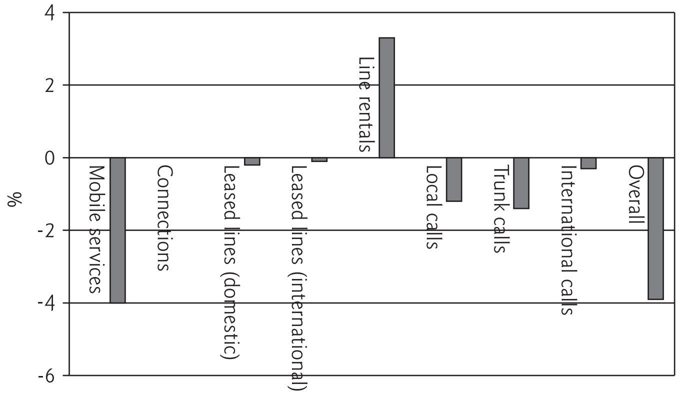
In the second basket the increase in line rentals has more than offset the decrease in local call charges. As a result, price movements in the 2000–01 financial year alone were not sufficient for Telstra to meet price cap requirements. However Telstra met its price sub-cap, thanks to the large carryover of 4 per cent from 1999–2000.

The sharp increase in line rentals indicates that a significant re-balancing is taking place although price declines have been substantially less than what would have been required in the absence of this large carryover.

4.2 Overview of the revenue weighted price movements for Telstra's services in the 2000–01 financial year

Figure 1 shows the size of the revenue weighted price movements for each of the Telstra services subject to the price control arrangements and the size of the overall revenue weighted price movement for these services. The revenue weighted price movements illustrate, for each service, their contribution towards the overall revenue weighted price movement. In the 2000–01 financial year the overall revenue weighted price declined by 3.9 per cent.

Figure 1. Telstra's revenue weighted price movements in the 2000–01 financial year



4.3 Telstra's compliance with the price-cap for the first basket

The determination provides that the revenue weighted price movement of the first basket (containing all services subject to price control arrangements) must not exceed CPI-5.5 per cent. This basket includes connections, line rentals, local calls and trunk calls, international calls, domestic leased lines, international leased lines and cellular digital mobile telephone services.

In the 1999–2000 financial year the June to June CPI was 3.2 per cent.[6] As a result, Telstra would have been required to reduce its overall revenue weighted prices by 2.3 per cent (3.2 per cent — 5.5 per cent) in the 2000–01 financial year. However, a carryover of 2.2 per cent was available from the previous financial year. Consequently, the required reduction was 0.1 per cent only.

Table 1 illustrates that Telstra's overall reduction in revenue weighted prices was 3.9 per cent, which was 3.8 per cent more than was required to meet its requirement under the determination.

6 The CPI, expressed as a percentage, for the weighted average of the eight Australian capital cities, for the financial year immediately preceding the price cap year, that represent the aggregate price movement in the all groups basket as published by the Australian Bureau of Statistics.

Table 1. Telstra's compliance with the price-cap for the first basket

Service	Price movements (%)	Revenue weights	Weighted price movement (%)
Digital cellular mobile telephone services	-14.2	0.282	-4.0
Connections	-	0.017	0.0
Domestic leased lines	-4.9	0.031	-0.2
International leased lines	-14.3	0.007	-0.1
Line rentals	+16.5	0.198	+3.3
Local calls	-7.1	0.169	-1.2
Trunk calls	-5.3	0.261	-1.4
International calls	-9.8	0.034	-0.3
Overall		**1.000**	**-3.9**
CPI			**3.2**
CPI-X			**-2.3**
Carryover from 1999–2000			**2.2**
Carryover to 2001–02			**3.8**

It can be seen from table 1 that the largest contribution to the decrease in the price of the overall basket for the financial year 2000–01 was made by digital cellular mobile telephone services. The price of these services decreased by 14.2 per cent, which contributed to a decrease of 4 per cent in the overall basket price. This favourable impact on the aggregate price movement was largely offset by the significant increase in line rentals, which increased by 16.5 per cent and contributed to a 3.3 per cent increase in the aggregate price level. Consequently, the price of the full basket decreased only by 3.9 per cent. In other words, the price for the basket as a whole would have increased in the 2000–01 financial year without the significant decrease in the price of mobile telephone services.

The price of international leased line services decreased almost by the same percentage points as that of mobile services. However, because of its low revenue weights, international leased lines contributed only 0.1 point or 2.6 per cent of the 3.9 percentage points decrease in the overall basket price.

Similarly, the decrease in the price of international calls by 9.8 per cent contributed only 0.3 percentage points or 7.7 per cent of the total fall in the overall basket price because of its relatively lower importance in the overall basket. By contrast, the decrease in the price of trunk calls by 5.3 per cent contributed 1.4 percentage point or 36 per cent of the overall price decrease of 3.9 per cent because of its relatively higher importance in the overall basket.

There has been a substantial rise in the carryover to the 2001–02 financial year compared the 1999–2000[7] financial year. This is an increase from 2.2 per cent to 3.8 per cent.

Given Telstra's changing approach to calculating price movements in the 2000–01 price control report, the ACCC believes it would be prudent to also re-evaluate the present carryover provisions. The ACCC is obliged to ensure the continued integrity of the report through a thorough review of the methodology although the substantial size of the carryover indicates Telstra would still comply with its price cap obligations in 2000–01.

4.4 Telstra's compliance with the price sub-caps for the second basket

The second basket comprises line rentals and local calls. The overall revenue weighted price movement for these services must not exceed CPI- 0 per cent.

The CPI applicable to the 2000-2001 reporting period was 3.2 per cent. In addition, Telstra was entitled to use a carryover point of 4 per cent from the 1999–2000 financial year. As a result, Telstra was required not to increase its overall revenue weighted price by more than 7.2 per cent (3.2 per cent - 0 per cent + 4.0 per cent).

Table 2 illustrates that the revenue weighted price decrease in local call charges was more than offset by the revenue weighted price increase in line rentals. As a result, price movements in the 2000–01 financial year alone were not sufficient for Telstra to meet its price cap requirements. However Telstra was able to meet its price sub-cap, thanks to the carryover point of 4 per cent from the previous year. The overall revenue weighted price increase of 5.6 per cent was 1.6 per cent lower than what Telstra was entitled to charge under the price sub-cap.

The table also shows that the carryover point has significantly declined from 4 per cent to 1.6 per cent between the 1999–2000 and 2000–01 financial years. This may suggest that there has been an apparent reduction in competitive pressure. But it also indicates that a significant re-balancing is taking place.

7 No carryover was permitted from the previous financial year.

Table 2. Telstra's compliance with the price sub-cap for the second basket

Service	Price movements (%)	Revenue weights	Weighted price movement (%)
Line rentals	+16.5	0.539	+8.9
Local calls	-7.1	0.461	-3.3
Overall		**1.000**	**5.6**
CPI			**3.2**
CPI-X			**3.2**
Carryover from 1999–2000			**4.0**
Carryover to 2001–02			**1.6**

4.5 Telstra's compliance with the price sub-caps for the third basket

The third basket comprises connections. The overall revenue weighted price movement for this service must not exceed CPI-0 per cent.

The CPI applicable to the 2000–01 reporting period was 3.2 per cent and a carryover of 1.1 per cent was available from the 1999–2000 financial year. As a result Telstra was required to not increase its overall revenue weighted price by more than 4.3 per cent (3.2 per cent - 0 per cent + 1.1 per cent).

Table 3 illustrates that there was no revenue weighted price movement for connections and, as a result, Telstra's entitlement of 4.3 per cent remained unused and carried over to the 2001–02 financial year.

Table 3. Telstra's compliance with the price sub-cap for the third basket

Service	Price movements (%)	Revenue weights	Weighted price movement (%)
Connections	-		-
Overall		**1.000**	**0.0**
CPI			**3.2**
CPI-X			**3.2**
Carryover from 1999–2000			**1.1**
Carryover to 2001–02			**4.3**

4.6 Telstra's compliance with the price sub-caps for the fourth basket

The fourth basket comprises fixed line services consumed by residential customers: connections, line rentals, local calls, trunk calls and international calls. Under the price control arrangements the overall revenue weighted price movement for these services must not exceed CPI-1 per cent.

In the 1999–2000 financial year the CPI was 3.2 per cent and a carryover of 1.2 per cent was available from the 1999–2000 financial year. As a result Telstra was required to not increase its overall revenue weighted price by more than 3.4 per cent (3.2 per cent - 1 per cent + 1.2 per cent).

Table 4 illustrates that the revenue weighted price decreases in local calls, trunk calls and international call charges to residential customers were offset by the revenue weighted price increase in line rentals for residential customers. However, Telstra was able to meet its price sub-cap. The overall revenue weighted price increase of 1.7 per cent was 1.7 per cent lower than Telstra's entitlement of 3.4 per cent.

Table 4. Telstra's compliance with the price sub-cap for the fourth basket

Service	Price movements (%)	Revenue weights	Weighted price movement (%)
Residential connections	-	.021	
Residential line rentals	+9.9	.510	+5.0
Residential local calls	--5.7	.233	-1.3
Residential trunk calls	-8.1	.214	-1.7
Residential international calls	-11.6	.022	-0.3
Overall		**1.000**	**1.7**
CPI			**3.2**
CPI-X			**2.2**
Carryover from 1999-2000			**1.2**
Carryover to 2001-2002			**1.7**

It is noted that the price movements for line rentals, local calls, trunk calls and international calls differ between the first and fourth basket. This is primarily because of the differences in customer segments included in the baskets (the first basket includes residential and business customers but the fourth basket includes 50 per cent of residential customers only). It also reflects the different methodologies applied.

4.7 Telstra's compliance with the metropolitan/non-metropolitan pricing parity

The determination requires that price reductions in Telstra's untimed local calls in geographic areas with effective competition flow on to customers in areas where competition may not yet have developed.

In the 2000–01 financial year Telstra complied with these requirements, with the revenue weighted average untimed local call prices for residential, charity and business customers in non-metropolitan areas not exceeding revenue weighted average untimed local call prices for the respective customer segments in metropolitan areas in the 1999–2000 financial year. This is illustrated in table 5.

Table 5. The metropolitan/non-metropolitan pricing parity: untimed local calls

Market segment	Metropolitan average price 1999–2000	Non-metropolitan average price 2000–01
Residential/charity	0.2244	0.1871
Business	0.2325	0.1956

4.8 Telstra's compliance with the requirement to notify the ACCC of line rental increase, for residential customers, greater than CPI

The determination requires that the ACCC must consent to a proposed increase in residential line rental charges that is greater than the CPI . Before consenting to the increase it must be satisfied that Telstra has available, or will have available at the time the increase takes effect, products which, if taken up by affected customers, would ensure that the average telephone bill of low-bill residential customers does not increase by more than CPI.

In the 2000–01 financial year, Telstra introduced a number of new pricing options that enable its customers to offset higher access charges against lower call charges. Initially, the pre-GST uniform monthly charge of $13.85 was raised to the GST-inclusive charge of $15.23 per month for non-business customers, which was replaced by a number of pricing options with the access charges ranging between $17.50 (GST inclusive) and $19.50 (GST inclusive).

8 Low-bill residential customers are defined as those who are (i) pre-selected to Telstra 30 days before the proposed increase being notified to the ACCC and (ii) among the 10 per cent of customers with the lowest telephone bills at that time.

From 1 February 2001 changes were made to the existing residential line rental and call charges and new pricing options were introduced. These options were:

- HomeLine Complete launched 1 February;
- HomeLine Plus launched 1 February;
- HomeLine Budget launched 1 February; and
- HomeLine Net was available 1st March.

HomeLine Part Service was progressively introduced from 1 April 2001, for customers who do not wish to take Telstra's total package including long distance calls. From 29 March 2001, HomeLine Complete, HomeLine Plus and HomeLine Net customers who were eligible for a pensioner concession were also eligible for $3.30 off call charges if their total spend on their service was less than $45 per month. Budget and Part customers were given a $1.10 off local calls each month.

These packages contain a number of special conditions and optional pricing packages, which makes direct comparison difficult. For example, the Homeline Plus Package includes an option of capped STD rates all day, or capped at a lower rate in the evening only.

The ACCC was satisfied that Telstra had in place products that would ensure that the average telephone bill of low-bill residential customers would not increase by more than CPI. However, the ACCC expressed concern to Telstra about the adequacy of information provided to customers about some of these new options. Telstra subsequently undertook to ensure its customers received appropriate information on these options.

Attachment A. An illustration of price movement calculations and related issues

The following equation to calculate price movements for the overall price cap and sub-caps is based on section 6.3 of the methodology.

Standard method: equation 1

Revenue weight (base revenue)	Price movement
$w_i = \dfrac{(v_2 p_1 - f_2 - s_2)_i}{\sum_i (v_2 p_1 - f_2 - s_2)_i}$ $= \dfrac{\text{Base}_i}{\text{Base revenue}}$	$\Delta p = \dfrac{r_2 - r_1}{r_1}$ $= \dfrac{(v_2 p_2 - f_2 - s_2) - (v_2 p_1 - f_1)}{(v_2 p_1 - f_1)}$ $= \dfrac{(v_2 p_2 - v_2 p_1) - (f_2 - f_1) - s_2}{(v_2 p_1 - f_1)}$ $= \dfrac{(\text{Gross}_2 - \text{Gross}_1) - (\text{Discount}_2 - \text{Discount}_1) - \text{Specials}_2}{(\text{Gross}_1 - \text{Discount}_1)}$

Where:

v = usage (call minutes);

p = standard price;

vp = gross revenue;

f = discounts (revenue foregone);

s = specials (revenue foregone);

r = net revenue (calculated from usage at standard price less discounts and specials); and

subscripts 1 and 2 indicate periods one and two and Δ stands for change.

In addition to the above, section 6.6.2 of the methodology provides that when it becomes difficult to measure price changes by calculating the change in standard prices, flex-plan discount etc, an alternative method of measuring changes in yields may be used.

The methodology provides for the yield approach as an exception rather than rule and does not specify how to calculate the yield. Telstra, in preparing the current report, applied the yield approach in seven out of eight services subject to the price cap. The ACCC, therefore, considers it appropriate that specific rules for calculation of the yield should be included in the methodology for future compliance reports by Telstra.

The ACCC has also identified a number of methodological issues which will be considered in its review of the methodology for future compliance reports.

ACCC contacts

ACCC infocentre

(for all business and consumer inquiries)

infoline 1300 302 502

websites http://www.accc.gov.au

http://www.forums.accc.gov.au

National office

Chief Executive Officer
Brian Cassidy (02) 6243 1124

Mergers and Asset Sales Branch
Mark Pearson (02) 6243 1276

Adjudication Branch
Tim Grimwade (02) 6243 1226

Compliance Division
David Smith (02) 6243 1234

Enforcement Coordination Branch
Lee Hollis (02) 6243 1382

Compliance Strategies Branch
Robert Antich (02) 6243 1030

Small Business, Rural and Regional Unit
Nigel Ridgway (02) 6243 1223

GST Unit
Ian Searles (02) 6243 1229

Legal Group
Bruce Brown (02) 6243 1273

Bob Alexander (General Counsel)
(02) 6243 1283

Regulatory Affairs Division
Joe Dimasi (03) 9290 1814

Gas Branch
Kanwaljit Kaur (02) 6243 1259

Electricity Group
Michael Rawstron (02) 6243 1249

Transport and Prices Oversight Group
Margaret Arblaster (03) 9290 1862

Telecommunications Group
Michael Cosgrave (03) 9290 1914

Corporate Management Branch
Helen Lu (02) 6243 1009

Media liaison
Lin Enright (02) 6243 1108

General publications queries
Publishing Unit, Canberra
(02) 6243 1143
Email: publishing.unit@accc.gov.au

Offices

ACT (national office)
Chief Executive Officer, Brian Cassidy
PO Box 1199, DICKSON ACT 2602

Tel: (02) 6243 1111
Fax: (02) 6243 1199

New South Wales
Regional Director, Rose Webb
GPO Box 3648, SYDNEY NSW 1044

Tel: (02) 9230 9133
Fax: (02) 9223 1092

Regional NSW
Manager, Steve Kilfoyle
PO Box 2071
TAMWORTH NSW 2340

Tel: (02) 6761 2000
Fax: (02) 6761 2445

Victoria
Regional Director, Tom Fahy
GPO Box 520J, MELBOURNE VIC 3001

Tel: (03) 9290 1800
Fax: (03) 9663 3699

South Australia
Regional Director, Bob Weymouth
GPO Box 922, ADELAIDE SA 5001

Tel: (08) 8213 3444
Fax: (08) 8410 4155

Queensland
Regional Director, Alan Ducret
PO Box 10048
Adelaide Street Post Office
BRISBANE QLD 4000

Tel: (07) 3835 4666
Fax: (07) 3832 0372

North Queensland
Acting Director Tony Hilton
PO Box 2016, TOWNSVILLE QLD 4810

Tel: (07) 4729 2666
Fax: (07) 4721 1538

Western Australia
Acting Regional Director, Sam di Scerni
PO Box 6381, EAST PERTH WA 6892

Tel: (08) 9325 3622
Fax: (08) 9325 5976

Tasmania
Regional Director, Peter Clemes
GPO Box 1210, HOBART TAS 7001

Tel: (03) 6215 9333
Fax: (03) 6234 7796

Northern Territory
Regional Director, Derek Farrell
GPO Box 3056, DARWIN NT 0801

Tel: (08) 8946 9666
Fax: (08) 8946 9600