

- The specifics of this instance - ADMA being unwilling and unable (due to its need to enable members to continue their privacy invasive business practices) to genuinely protect consumers, and there being no oversight or pressure for it to do so.

There is no "Code Authority". There is a pretence to such a body existing, but there is no evidence of a separate organisation, with articles of association, constitution, budget, audited accounts etc. The "Code Authority" is not under any kind of public oversight - it is a private function within ADMA.

As best as can be ascertained from publicly available material, the "Code Authority" is a secretariat of ADMA staff handling day-to-day operations, with a chairman, two industry representatives and two "consumer representatives". These people are presumably paid and work as contractors. There is no public disclosure in the "Authority's" annual reports, or anywhere else of some matters which are crucial to the independence of these people:

- There is no mention of what they are paid.
- There is no mention of the length or nature of the contracts they are on.
- There are no details of what non-disclosure agreements board members have signed regarding their interaction with ADMA proper, their work on the so-called "Code Authority" or their interaction in this role with ADMA members and members of the public.
- There are no minutes of meetings or public disclosure of communication between the so-called "Authority" and ADMA.

So we have no reason whatsoever to think of these people as independent in their "Code Authority" activities.

There is no information at all on how they are selected.

As far as I am aware, the so-called "consumer representatives" were not selected in consultation with any consumer representative body. A proper approach would be to leave the appointment of consumer representatives to AFCO (Australian Federation of Consumer Organisations <http://www.consumersfederation.com>) who would also ensure that their terms of involvement and payment enabled them to be truly independent from ADMA and so to truly represent consumers.

The chairman and one of the "consumer representatives" are members of the Australian Consumers Association board. But what are their capabilities in the "Code Authority"? If they were to suggest real regulation, such as telemarketing being conducted on an opt-in basis only (which is the only way of properly protecting the public) ADMA would ignore it. What then would be their position in this "Code Authority"?

This so-called "Authority" is not a separate body - it is part of ADMA. ADMA consistently claim to have 500 members, when the real number is less than 450. ADMA consistently claims the "Authority" is independent, when it is in no way independent of ADMA. These seem to be three clear, and oft-repeated, instances of false and misleading advertising.

Chris Connolly's submission covers the low level of complaints (compared to direct marketing complaints directed to state and federal privacy commissioners) which shows there is a low public awareness of, and/or trust in, this Code and its so-called "Authority".

There appears to be no oversight whatsoever of either ADMA or the "Authority" to give confidence in any of the published information about the Code, the "do-not-call" list, the "Authority" or the complaints from the public. ADMA can't even get its own membership numbers right within 10%. Why should the ACCC or the public have faith in the accuracy of any other qualitative or quantitative information ADMA presents?

Only cursory details of complaints are given.

Complaints can only be made in writing, which precludes the faster and more convenient method of email, and the more interactive, reassuring and informative approach of making a complaint by phone.

This is the "Authority", given government approval to self-regulate the direct marketing industry, including outbound telemarketing which involves hundreds of millions of intrusive phone calls a year. Yet there is no provision for using the telephone to call the "Authority" regarding complaints.

ADMA contends, and the ACCC seemed to accept, that the threat of expulsion from ADMA was likely to be a significant deterrent to members who failed to meet the requirements (weak though they are) of the Code. Yet when one long-time member of ADMA is found by the "Authority" to be repeatedly violating the code, it willingly left the organisation. (2000-2001 report. Victor Paul Direct Marketing Pty Ltd is "sanctioned" for "unsatisfactory handling of complaints, disputed billing practices, and lack of clarity of the initial offer". The company, a member since 1994, advised in August 2000 that it would not be renewing its ADMA membership.)

This shows that the "Authority" has no clout with at least some companies, and probably most companies, whose business practices harm consumers - since the company can save the bother of code compliance and its ADMA fees by either leaving ADMA, or never joining in the first place. The implication is that the so-called benefits to a company from the public perceiving it to be an ADMA member are worth little or nothing to such companies.

Without the ability to order financial compensation, the "Authority" is truly toothless, since its worst possible action against a non-compliant ADMA member is to expel the member and so free the company from its obligations under the code.

All these concerns were raised in 1999 by the advocates as arguments that self-regulation for an "industry" - or rather a business practice - where the majority of problems are caused by hard-to-identify, unprincipled, systematically intrusive and exploitative "cowboys" can never work. Those telemarketers who most urgently need to be regulated are those which are least likely to pay money to join ADMA, to pay for access to the do-not-call list and so to be subject to the Code in any way.

The "Code Authority" meets every three months. How can this facilitate timely handling of consumer complaints?

What qualifications does its secretariat have to deal with complaints day-to-day? Do they keep in touch with complainants via phone and email, or are all attempts at resolution conducted by the slow, formal, one-way use of letters in the postal system?

The "Code Authority" produces an annual report as its sole public record of activity. This is slow to come out (no 2002-2003 report yet on 11 September 2003 - and the previous years report's PDF file was created on 20 March 2003) and gives no indication that the "Authority"

is genuinely interested in protecting consumers from telemarketing. While the "Authority" can suggest changes to the Code to ADMA, in the years reported to date, there has been no suggestion that, for instance, outbound telemarketing be conducted on an opt-in basis only.

There is no information on the number of members or non-members who used the do-not-call/mail list. (I wrote to ADMA about this on 8 September and have not received a response by the time this submission was completed after 4PM on 12 September.)

The 2001-2002 report does not mention the number of people who have registered with the do-not-call/mail list. The previous reports give the following information:

Prior to 1999-2000: 16,000.

During 1999-2000: 8,000 new, for a total of 24,000.

2000-2001 report, total is now 49,000.

This last figure was presumably for the end of June 2001. Now, two years and three months have passed and ADMA expects the ACCC to give another five years of approval for its Code and so-called "Authority". But where is the key information on numbers of people who have registered for the opt-out list? Where is the information on how many members and non-members of ADMA have actually paid the fees to use the list?

How can ADMA justify charging its own members for a list of consumers who should not be contacted, when compliance with this list is a requirement of membership? The fees are substantial, and in addition to the membership fees, constitute a further disincentive for any business, especially a smaller business, for using this list or being subject to the Code and its so-called "Authority".

The fees on 11 September 2003 are:

File Type	Member	Non-member
Do not Mail / Do Not Call	\$450	\$1450
Do Not Email	\$250	\$750
M-Marketing Opt-Out	\$250	\$750
Do Not Email/ M-Marketing Opt-Out	\$450	\$1450
Complete Package	\$750	\$2500

Since the lowest fee for ADMA membership (companies with less than \$750k) is \$1,089:

Annual Gross Revenue	Total Inc. GST
Under \$750,000	\$1,089
\$750,000-	\$2,078

\$1,500,000	
\$1,500,000- \$3,000,000	\$4,290
\$3,000,000- \$5,000,000	\$6,820
\$5,000,000- \$10,000,000	\$10,340
Over \$10,000,000	\$16,500

any small telemarketer who wants to comply with the the do-not-call list faces a cost of \$1450 (these are all annual fees) or \$1539 including joining ADMA and so being subject to the Code authority. (Although the contract for the list - 4.4 - involves the licensee undertaking to comply with the Code.)

By contrast, the US Do-Not-Call system provides free access to the list for five area codes (telephone areas in the USA are significantly smaller than the big metropolitan areas of Australia). There is also a manual web-based system for looking up numbers - I can't find cost information for this, so perhaps it is free.

The low number of registrations on the do-not-contact list shows that it is almost entirely ineffectual at protecting Australians from unwanted intrusive communications, especially outbound telemarketing.

The USA has population about 13 times that of Australia. At the start of operations of the US Do-Not-Call service (the end of August 2003 cutoff date for the list which becomes effective on 1 October) there were 48,400,000 registrations. In Australia, after two years of ADMA's code, its opt-out-list had 49,000 registrations - 1/1000 of the number, with 1/23 of the population.. So the US **legislated, government controlled, telemarketing opt-out list** was very quickly **43 times as effective** as ADMA's industry controlled, weak, "self-regulated" scheme. Furthermore, the US scheme covers all telemarketers, whilst ADMA's only covers a small fraction - 10% or less.

It is reasonable to assume that the number of people registering in the US scheme will double over time. Even allowing for some growth in ADMA's numbers (which one would think they would have reported if they had grown) to as much as double the 49,000 reported in 2001, it seems that ADMA is never going to have more than 1/43 of the proportion of the population on its list than the US government scheme. Multiplying this factor - 1/43 - by the low coverage of the "industry" (say 10%) then we must conclude that as a proportion of calls affecting the general population, **the US, legislated, government controlled scheme is at least 400 times as effective as ADMA's.**

How can ADMA's Code "Authority" be considered "independent" or publicly accountable when it is necessary to use Google to find out anything about its M-Marketing Committee, and when an enquiry about the do-not-contact list registrations and the numbers of members and non-members who use it goes unanswered?

Privacy and security problems of the Opt-Out List

ADMA's list does not apply to businesses - yet businesses or other organisations such as charitable organisations involved in delivering social services - are constantly hounded by

telemarketers and hawkers. The great majority of businesses have an "Absolutely No Hawkers" sign on their doors, but no such thing is possible via telephone.

The public and privacy advocates have no reason to trust ADMA its "Authority" or any of the members or non-members who access the list.

The public is asked to provide their name, phone number (for opting out of telemarketing) and/or address (opting out of direct mail). Likewise their mobile-phone number and email address for opting out of being contacted by these methods.

The full information is then included in the list to be distributed to members and non-members. There is no possible way of ensuring that the information is used only as intended.

The list could not possibly be used by anyone who values their privacy, because it explicitly links their name to whatever contact details they put on the list.

It only takes one unprincipled employee to take a copy of the list and forward it to persons who would misuse it for there to be serious and perhaps life-threatening impact on people who placed their details on the list. There is absolutely no way of preventing this or detecting any such copying and misuse.

Stalkers, abusers and the like cannot be prevented from paying other people to supply information on the people they want to know the whereabouts of. This leads to a straightforward financial incentive for misuse of the list, including non-ADMA members to purchase it under false pretences which ADMA would find hard to detect. Anyone at all in Australia can pretend to be a telemarketer and purchase the list, and ADMA has no way of ensuring the bona-fides of any such person.

No public figure, or person trying to remain safe from an abusive ex-partner, or who feels under threat from criminals (including corrupt police) could possibly use this list without great risk.

The M-Marketing Code of Practice

(ACIF has a Code regarding SMS marketing
http://www.acif.org.au/ACIF/files/C580_20021.pdf which I have not had time to study.)

The telephone network, email and later mobile text communications developed in an environment where security and privacy were not properly considered. Since mobile text messaging (and other more complex protocols with extensive text, audio, graphic and video content) has become widely adopted *after* the terrible problems of telemarketing and spam became well known, it is not surprising that those promoting mobile services were at pains to prevent its widespread misuse.

(This has not occurred in Japan, where the widely used, mobile phone, email and somewhat Internet-compatible, DoCoMo i-mode system was reported in early 2002 to carry emails which were 98% spam. http://www.jir.net/jir5_02.html#3 "Of the 900 million messages that go through DoCoMo's servers each day, 880 million (98%) are spam, according to the company. The problem is that, regardless of the source of the message, subscriber phones ring (or vibrate) every time mail arrives." These phones have a unique email address such as: <telephonenumber@docomo.ne.jp> A test phone received 857 spams in August 2001 rising to 2,578 spam messages in February 2002.)

ADMA's initial approach to email and "M-Marketing", was purely opt-out - as still reflected in its do-not-contact list. This is to be expected from any industry body, since the opt-in approach - the only one which properly protects consumers - would result in a virtual cessation of the practice, unless marketers were somehow able to convince a significant number of people to accept their messages.

It is not clear how ADMA's M-Marketing Code came into being, but it is dated June 2003. Acknowledgement is given to the carrier AAPT, but Google finds no significant reference to "M-Marketing Council" (AKA "Mobile Marketing Council") outside ADMA's site - and the site's page for this "Council" is available only to ADMA members. According to www.bandt.com.au/articles/a4/0c0163a4.asp this was chaired by David Burden, CEO of Legion Interactive <http://www.legioninteractive.com.au> which operates BlueSkyFrog, claiming "811,795 customers opted-in to receive email and mobile marketing messages".

(I once made the mistake of registering my GSM phone number with <http://www.blueskyfrog.com> .. I subsequently repeatedly tried to have them cease sending me emails/SMS messages and to cancel my account, since their website provided no way of doing either. After multiple emails, the problem ceased. Their Privacy Policy <http://www8.blueskyfrog.com/public/index.cfm?page=privacypolicy&dir=legal> makes no mention of account cancellation, or of ADMA, or the M-Marketing Code.)

(The privacy pages of both AAPT and its mobile subsidiary (http://www.aapt.com.au/about/reg_compliance/Privacy_Awareness_Policy.asp & <http://www.aaptmobile.com.au/cellone/corporate/privacy.htm>) have no mention ADMA or the M-Marketing Code.)

(This Code was supposedly launched in association with NOIE - the National Office of the Information Economy <http://www.noie.gov.au> - but searching their site for "Mobile Marketing" and "M-Marketing" produced no results.)

The M-Marketing Code covers an open-ended variety of communication techniques and requires that people either **opt-in** or be an existing customer of the company who sends them commercial messages.

Opt-in is the only proper approach for regulating intrusive communications.

The M-Marketing Code has minimum requirements for each message:

- Information identifying the message originator in such a way that they can be easily recognised and contacted by the recipient.
- Details of an appropriate contact mechanism that allows the recipient to obtain all the following information in relation to the message originator:
 - Full company name
 - Legal address
 - Company registration details
 - Postal address - PO Box addresses are not permitted
 - Email address.
 - Fixed line telephone number.
 - Where appropriate, details of where the recipient can view or hear the terms and conditions applicable to a particular promotion, advertisement or offer.
 - Contact details to which enquiries or complaints should be directed.

- The contact mechanism provided (above) must be provided at low cost and be easy to use by the recipient.

So in order to opt-out of future messages, or to even find out how to opt-out, the recipient may be required to use a service which costs them a fee. While this may be necessitated by the costs and very limited message lengths of SMS (160 or 130 characters depending on the technology), this complicated and potentially costly burden of responding to or opting out of mobile marketing messages is a burden on individuals, and further cause for them to only be sent to people who *explicitly* opt-in to them, not just to anyone who becomes a customer of a company which wants to send such messages.

If a Google search is anything to go by, there is close to zero public or industry awareness of this M-Marketing Code.

ADMA's amendments are irrelevant

In respect of telemarketing at least, there is nothing ADMA could do to alter its code which would result in its approval (AKA authorisation) by the ACCC leading to net public benefit.

This submission has given many reasons why this is the case. These are summarised below.

No net benefits for consumers in approving the proposed Code

If ACCC approval of ADMA's code was in the public interest, then consumer/privacy advocates would support it. However we believe that the regulation of intrusive telecommunications, and many other aspects of consumer protection, are best achieved by government regulation, rather than self-regulation or a maze of ADR (Alternative Dispute Resolution) schemes.

In order to approve this Code, the ACCC needs to establish beyond question that there is net benefit to consumers in doing so. Its not good enough to identify one or more specific items of real or purported benefit and assume from this that the benefit of approval is in total positive. Approval of this code involves immense costs to consumers immediately (the continuation of virtually unrestricted telemarketing, with government approval), and in the broader sense of damaging the prospects for proper regulation of the problems inherent in direct marketing. So the ACCC needs to consider all these factors in deciding whether the *net* benefit is positive.

There are a series of tests which ADMA's proposal - and ADMA itself - must pass in order for the Code to be approved. Failing any one of these tests renders the Code unapprovable. Most of these tests have nothing to do with the Code itself, so its not a question of the ACCC granting approval subject to changes to the code, or additional conditions to take effect in the future.

The purpose of government is to support and protect citizens - with particular emphasis on protecting citizens from threats they cannot protect themselves from individually, if this can be achieved efficiently on a country-wide basis, without significant diminution of individual freedoms or imposing unreasonable burdens on citizens.

The ACCC's responsibility is to protect consumers and businesses - in this case from a small proportion of businesses who impose great costs on society by pursuing unreasonable business

practices which the vast majority of individuals and businesses would never inflict on anyone.

Authorisation of ADMA's Code in 1999 was a mistake. It constituted government approval of business practices which burden uninvolved parties with unreasonable costs. It was a clear statement to the public that ADMA is a trustworthy organisation, that it has proper coverage of telemarketing and other aspects of direct marketing, and that the public should be happy with the meagre protections and dispute resolutions its Code and "Authority" offers.

In summarising this submission, here are a list of tests, all of which the ACCC must establish beyond reasonable doubt that ADMA, its Code and the "Code Authority" pass, before authorisation can be contemplated.

1 - ADMA's coverage of telemarketing and direct mail

ADMA fails this test for telemarketing in several ways. Its absolute coverage of telemarketing bureaux (companies large and small who conduct telemarketing for others) is minimal - for instance 10% of those listed in the Yellow Pages in Victoria. Its coverage of such bureaux is clearly less than that of a competing industry association, the ATA. ADMA's coverage (and the ATA's) of the businesses and charities which sometimes, or as a core part of their operations, engage in outbound telemarketing is probably below 10%. My experience of telemarketing calls is solid evidence that most organisations which make these calls have nothing to do with ADMA. ADMA's coverage of list brokers is similarly deficient.

To what extent ADMA has coverage of direct mail bureaux, companies and charities whose operations centre on direct mail, or the much broader range of companies and charities who at times use direct mail, I cannot be sure. But it seems there is a similar pattern of ADMA overstating its own importance and pretending there is a clearly definable industry when in fact this is simply a business practice with serious privacy problems which needs to be regulated by government legislation.

2 - ADMA's integrity and suitability for being a government approved regulator

ADMA's integrity is lacking in many ways. The organisation has known since 1991 that telemarketing at any time is rejected by the great majority of consumers. Its own research (kindly forwarded to me in 1992 by a previous director and which is analysed and reproduced in facsimile at <http://www.firstpr.com.au/issues/tm/adma-survey/>) 70% of the 1204 respondents to a national telephone survey say that outbound telemarketing is unacceptable to them. Telephone surveys have a low response rate (due largely to the pressures of telemarketing) and it is reasonable to assume that the proportion of the public who did not respond, say 40% to 60% in those days (response rates are generally much lower in recent years), find telemarketing entirely unacceptable. Chris Connolly's submission details more recent research by the Privacy Commissioner showing that about 90% of respondents find telemarketing unacceptable. In my own discussions with many people over the years, I haven't met anyone who found it acceptable.

Telemarketers know very well how unacceptable their intrusive communications are.

Any person, company, charity or industry organisation with integrity would work hard to prevent exploitative business practices like outbound telemarketing from burdening the vast majority of people at home and in businesses who find it unacceptable.

ADMA pretends to want to protect consumer privacy. But this is a transparent sham. If ADMA, or telemarketers, valued consumer privacy, or if they wanted to prevent the

costly interruptions all businesses (and government / community organisations) suffer from telemarketers, then they would work assiduously to ensure outbound telemarketing was conducted only on an opt-in basis.

There are many ways in which ADMA can be seen to lack the integrity which befits an organisation which the government entrusts with consumer protection responsibilities. Many of the trade-organisations which apply for ACCC authorisation are of a high integrity, but ADMA is surely at the bottom of the integrity scale, and on many counts far below the basic requirements the ACCC expects.

- Since the 1999-2000 Code "Authority" report, ADMA has consistently claimed "500" or "more than 500" corporate members - in its website, submissions to government enquiries, and in subsequent reports, but its membership was 370 in October 1998 and no more than 443 in September 2003. Unless it is believed that the supposed industry peak body for list-based marketing can't maintain its website to reflect its own fee-paying membership (who supposedly rely on their ADMA membership for credibility) then the ACCC and all other government bodies should regard these claims of "500" corporate members as deliberate deception.
- ADMA's claims of high coverage of outbound telemarketing are similarly deceptive. ADMA knows very well that it covers only a small fraction of outbound telemarketers.
- ADMA's apparent failure to mention to the ACCC that there is another telemarketing industry body - the ATA - is further proof that ADMA is trying to avoid proper scrutiny, and has no genuine interest in the truth or in genuine industry self-regulation. Likewise ADMA's complete failure to mention the ATA on its site and its apparent failure to notify the ATA of this authorisation application. (Similarly, the ATA's complete lack of mention of ADMA or its Code - and instead suggesting consumers contact the ATA if they have a problem with telemarketers - indicates that the ATA has no interest in the truth or in proper regulation.)
- ADMA has never acted to genuinely limit telemarketing calls to those who express a desire to receive them - yet this is the only possible way of protecting the public.

There are no-doubt many more aspects to ADMA's lack of integrity - but its not just ADMA specifically which would be unable to have the required high integrity required of any government-authorized industry self-regulator.

The entire notion of an industry body successfully curtailing a pernicious business practice to achieve proper consumer protection, when that "industry" is entirely based on this pernicious business practice, means that no industry body, which represents industry participants, could ever survive if acted seriously to protect consumers.

The logic of this is inexorable: the interests of the industry participants is inherently at odds with the interests of the public, because the "industry" is based on an exploitative business practice which is intrusive and costly to - and rejected by - the vast majority of businesses and consumers who are targeted. So its probably not fair to blame ADMA for its failure to genuinely seek consumer protection - just as it would hardly be fair to blame foxes for being constitutionally incapable of protecting chickens. Like foxes, telemarketers and ADMA would starve if their quarry was genuinely protected. It is unrealistic to expect a self-regulatory body like ADMA, in an industry based on

exploitation of the public, to genuinely protect the public.

3 - Approval of ADMA's code has serious broad costs for the public and for policy development

For the ACCC to approve this entirely deficient form of so-called consumer protection is firstly to deceive the public that this is in fact effective and that ADMA has the integrity and capability to protect the public from outbound telemarketing. This would be a dereliction of the ACCC's formal and moral duty to the public. Such a decision would force the public, in the years to come, to negotiate a minefield of potentially overlapping and often deficient, poorly run, toothless, non-government alternative dispute resolution arrangements. Citizens pay their taxes and comply with the laws with the reasonable expectation that the governments they fund, and give legitimacy to, will act to protect them.

But there would be further long-term costs to the public if this approval was made. Firstly, the government approval for open-slayer telemarketing (with an ineffectual and privacy violating opt-out list) is then seen as a supposedly acceptable benchmark for other aspects of government policy and industry self-regulation. Chris Connolly discovered an instance of a state electricity marketing code which copied ADMA's telemarketing hours - no-doubt in part because these hours are "ACCC-approved".

Secondly, whenever the question of telemarketing regulation arises, ADMA and others who are opposed to real regulation (including those in government, politics, the bureaucracy and other industries who are opposed to genuine, hard, regulation) can deflect calls for proper regulation by pointing to the "ADMA's ACCC-approved Code of Practice, with its Independent Code Authority" as an already existing arrangement which properly protects consumers.

By refusing to re-authorise this Code, the ACCC would be reversing its mistake of 1999. It would be withdrawing government support for this worse than useless Code and its untrustworthy sponsor, ADMA, and thereby providing a basis on which proper regulation can be developed. Proper regulation of telemarketing is opt-in. World's best practice of telemarketing regulation is at least at the level of the USA's privacy protective opt-out list, with hard government legislation for real fines (USD\$11,000 per call).

I have run out of time to complete this submission. But even if only a fraction of the problems highlighted here were true, then ACCC approval for ADMA's code would be impossible to contemplate.

There may be a relatively small number of submissions opposing ADMA's application, due to this not being a publicly advertised process, due to privacy advocates having their hands full with many other issues, and also due to this week having two privacy conferences in Sydney.

I trust that the ACCC will consider all these points carefully, and take a close look at major developments in telemarketing regulation which have taken place in Europe and the USA since 1999.

Attachments

I will supply these in hard copy - and I ask that the ACCC print these documents too since

they can best be considered on paper, rather than on screen.

- An explanation of how to comply with the US TSR (Telemarketing Sales Rule): <http://www.ftc.gov/bcp/online/pubs/buspubs/tsrcomp.htm> ..
- US Federal Trade Commission 16 CFR Part 310 Telemarketing Sales Rule; Final Rule: <http://www.ftc.gov/os/2003/01/tsrfrn.pdf> ..
- A text file I prepared from ADMA's site, listing their members (with duplicates removed) and with list suppliers and telemarketers flagged: **ADMA-members-2003-09-09.txt** (In this version of the submission, emailed as a single file to the ACCC, for simplicity I have appended this text below.)

Australian Direct Marketing Association members 9 September 2003.

List and Telemarketing Services members flagged with L and T.

	303 Advertising	SUBIACO	WA
	360 Partnership	SYDNEY	NSW
	A.P.V.C. Business Holdings P/L	ROBINA	QLD
	A1 Green House Printing	HAYMARKET	NSW
	AAMI Insurance Company Ltd	MELBOURNE	VIC
	AAPT Ltd	SYDNEY	NSW
	ACE Insurance Limited	SYDNEY	NSW
	ACP Publishing Pty Ltd	SYDNEY	NSW
	Action Direct Marketing Pty Ltd	MALVERN	VIC
T	Active Mail	TAREN POINT	NSW
L	Acxiom	SYDNEY	NSW
T	Advantage Communications & Marketing Pty Ltd	NORTH PERTH	WA
	Advertising Depot	PADDINGTON	QLD
	AdXplorer	WOOLLAHRA	NSW
	AGL Energy Sales & Marketing	NORTH SYDNEY	NSW
	Air New Zealand	SYDNEY	NSW
	Allegiance Marketing Pty Ltd	MANLY	NSW
	Allens Stores Pty Ltd	FYSHWICK	ACT
	American Express International Inc	SYDNEY	NSW
	American Home Assurance Company	MELBOURNE	VIC
	AMP	SYDNEY	NSW
	Amway of Australia	CASTLE HILL	NSW
	ANZ Bank	MELBOURNE	VIC
	AOL/7 Pty Ltd	CHATSWOOD	NSW
	AP Mail Management Pty Ltd	PARRAMATTA	NSW
T	Atlantis Information Services Pty Ltd	GLADESVILLE	NSW
	Audi Australia Pty Ltd	CONCORD WEST	NSW
	Aussie Mortgage Market	SYDNEY	NSW
	AUSTAR Entertainment	SOUTH SYDNEY	NSW
L	Australasian Medical Publishing Co Pty Ltd	STRAWBERRY HILLS	
NSW			
	Australia Post	MELBOURNE	VIC
	Australian Business Limited	NORTH SYDNEY	NSW
	Australian Central Credit Union	ADELAIDE	SA
	Australian Committee For Unicef Ltd	SYDNEY SOUTH	NSW

	Australian Direct Marketing Association	KINGS CROSS NSW
	Australian Envelopes	NOTTING HILL VIC
	Australian Pensioners Insurance Agency	MELBOURNE VIC
	Australian Quality Monitoring	MANLY NSW
	Australian Red Cross	SOUTH CARLTON VIC
	Australian Unity Limited	SOUTH MELBOURNE
VIC		
	Australian Wine Selectors Pty Ltd	HUNTER REGION MC
NSW		
	AVIS Australia	MASCOT NSW
	Avnet Computer Marketing	NORTH RYDE NSW
	AWDM	SURRY HILLS NSW
L	Axiom Databases / Axiom Marketing & Communications	ARTARMON
NSW		
	Bank of Western Australia	PERTH WA
	Batey Vida	THE ROCKS NSW
	Baycorp Advantage Marketing Solutions Pty Ltd	SYDNEY NSW
	BCM Direct	FORTITUDE VALLEY
QLD		
	Berger Software Pty Ltd	NORTH RYDE NSW
	Black Box Network Services Australia Pty Ltd	CROYDON VIC
	Black Ink	BRISBANE QLD
	Blue Star Print Group Australia	SILVERWATER NSW
T	Blueprint Management Group Pty Ltd	SYDNEY NSW
T	Boomerang Integrated Marketing and Advertising	BALMAIN NSW
	Boystown Lotteries	MILTON QLD
	Brett Goulston and Associates	CROWS NEST NSW
	Bristow Prentice Lambaart Budd	ALBERT PARK VIC
	Brown Melhuish Fishlock Pty Ltd	PYRMONT NSW
T	Call Centre INTEGRITY Pty Ltd	MILSONS POINT NSW
	callcentres.net Pty Ltd	NORTH SYDNEY NSW
	Caltex Australia	SYDNEY NSW
	Candida Stationery Pty Ltd	LIDCOMBE NORTH NSW
	Capital Finance Australia Ltd	SYDNEY NSW
	Carlson Marketing Group	SYDNEY NSW
	CCH Australia Ltd	SYDNEY NSW
	Cellarmaster Wines Pty Ltd	BONDI JUNCTION NSW
	Children's Cancer Institute Australia for Medical Research	
RANDWICK NSW		
	Chippendale	CONCORD WEST NSW
	Chubb Home Security Pty Limited	ASHFIELD NSW
	CIGNA International Marketing Australia Ltd	SYDNEY NSW
	Citibank Limited	SYDNEY NSW
	Clayton Utz	SYDNEY NSW
	Clemenger Proximity Pty Ltd	ST LEONARDS NSW
	CNet Direct	BROADWAY NSW
	Cojo	CHATSWOOD NSW
	Colourcraft Printing Pty Ltd	KEYSBOROUGH VIC
	Commonwealth Bank	SYDNEY NSW
	Commonwealth Securities Limited	SYDNEY NSW
L	T Comprite Pty Ltd	RED HILL QLD
L	Construction Research of Australia Pty Ltd	VICTORIA PARK WA
T	Contact Centres Australia Pty Ltd	SURRY HILLS NSW

T	Controlled Marketing Cumming Agency & Studios Pty Ltd Curtis Jones & Brown Advertising	WEST PERTH WA DARLINGTON NSW BALMAIN NSW
T	Customers 1 to1 Pty Ltd CW Agencies Inc Dale and Waters Dalton Fine Paper Data Active Data Demographics Pty Ltd Data Solutions Australia Database Communications Pty Ltd Database Consultants Australia (DCA)	CHATSWOOD NSW VANCOUVER BC 0 PERTH WA SCORESBY VIC ORMOND VIC SYDNEY NSW NORTH SYDNEY NSW MELBOURNE VIC NORTH MELBOURNE
VIC	DataTools Pty Ltd Day-Timers Pty Limited Demedia Australia Pty Ltd Desktop Marketing Systems Pty Ltd (DTMS) Deutsche Post Global Mail (Australia) Pty Ltd Dibbs Barker Gosling Lawyers Diners Club Pty Ltd	PARRAMATTA NSW HORNSBY NSW EAST BURWOOD VIC BLACKBURN VIC MASCOT NSW SYDNEY NSW MELBOURNE VIC SYDNEY NSW DANDENONG SOUTH
T	Direct Connect Direct Mail & Marketing Pty Ltd	
VIC	Direct Mail Services Pty Ltd Direct Marketing Services Pty Ltd	MASCOT NSW CREMORNE JUNCTION
NSW	Direct Marketing Software DK Marketing Pty Ltd dmc Direct Print Solutions Doubleday Australia Pty Ltd Draft	TOOWONG QLD BUNDALL QLD BURWOOD VIC LANE COVE NSW SYDNEY NSW MELBOURNE VIC MELBOURNE VIC SYDNEY NSW DEE WHY NSW SOUTH YARRA VIC PORT MELBOURNE VIC GOROKAN NSW ADELAIDE SA
L	Drake List Management Dun & Bradstreet Dymocks (NSW) Pty Ltd Dynamic Press e-dm.com.au pty ltd e-fill Pty Ltd Elcom Credit Union Ltd Elders Ltd	CHATSWOOD NSW NORTH SYDNEY NSW FORTITUDE VALLEY
L	Emailcash Marketing Pty Ltd Encyclopaedia Britannica Australia Ltd Endeavour Foundation	
QLD	Energex Retail Pty Ltd EnergyAustralia Enterprise Marketing Pty Ltd Envelope Specialists Epitact Pty Ltd Ergon Energy Pty Ltd	BRISBANE QLD SYDNEY NSW MOSMAN NSW OSBORNE PARK WA KENMORE EAST QLD BRISBANE CENTRAL
QLD	Erskine Dental ESG Direct Euro RSCG Partnership	MACKSVILLE NSW SYDNEY NSW NORTH SYDNEY NSW

Evalue	SURRY HILLS NSW
Express Logistics International Pty Ltd	ALEXANDRIA NSW
EXTRAFILM	SOUTHPORT QLD
Ezyhealth Company Pty Ltd	GOLD COAST MC QLD
f2- Australia & New Zealand Pty Ltd	PYRMONT NSW
Fairfax	SYDNEY NSW
Faxem International Pty Ltd	NEWPORT NSW
FCB Sydney	PYRMONT NSW
Finger Graphics Pty Ltd	ELTHAM NORTH VIC
Flight Centre Limited	BRISBANE QLD
Flightcentre Corporate	SYDNEY NSW
FOXTEL Management Pty Ltd	SYDNEY NSW
Friend Group Pty Ltd	MILLERS POINT NSW
Fuel Marketing Solutions Pty Ltd	RICHMOND VIC
Fuji Xerox Australia	NORTH RYDE NSW
Future Sources	ALEXANDRIA NSW
Gallery Global Network Ltd	EAST SYDNEY NSW
GE Capital Finance Australia	RICHMOND VIC
Gembold Holdings Pty Ltd	PERTH WA
George Patterson Bates	SYDNEY NSW
Geospend - Division of Australia Post	MELBOURNE VIC
L Global Contact Solutions Pty Ltd	SURREY HILLS VIC
Global Loyalty	NORTH SYDNEY NSW
Gold Corporation	PERTH WA
Golden Casket Lottery Corporation Limited	COORPAROO D.C QLD
Government Employees Superannuation Board	PERTH WA
Greater Building Society Ltd	HAMILTON NSW
Greenpeace Australia Pacific Ltd	SYDNEY NSW
Grey ³ Pty Ltd	KINGSTON ACT /
MILSONS POINT NSW / MELBOURNE VIC	
Guide Dog Association of New South Wales and ACT	CHATSWOOD
NSW	
Guide Dog Association of Victoria	KEW VIC
Harlequin Enterprises (Australia) Pty Ltd	CHATSWOOD DC NSW
Harstel Pty Ltd - Celebrity Wigs	MELBOURNE VIC
Heritage Fine Wines	SYDNEY NSW
Hewlett Packard	NORTH RYDE NSW
Hi Fert Pty Ltd	MELBOURNE VIC
T Hogan Marketing Services	SYDNEY NSW
Holiday Concepts Corporation Pty Ltd	RICHMOND VIC
Home Building Society Ltd	EAST PERTH WA
Hopewiser Ltd	MELBOURNE VIC
Horizon Media	NEUTRAL BAY NSW
Horwitz Publications Pty Ltd	ST LEONARDS NSW
HPA Pty Ltd	MATRAVILLE NSW
HSBC Bank Australia Limited	SYDNEY NSW
Hulsbosch Pty Ltd	NEUTRAL BAY NSW
Hyundai Automotive Distributors Pty Ltd	CONCORD WEST NSW
ICLP Pty Ltd	CROWS NEST NSW
T ICT Australia Pty Ltd	SYDNEY NSW
IDG Communications Pty Ltd	ST LEONARDS NSW
iGo Direct Pty Ltd	SOUTH MELBOURNE
VIC	

	IIR Pty Ltd	NORTH SYDNEY NSW
T	iLeo	MCMAHONS POINT NSW
	Illawarra Mutual Building Society Ltd	WOLLONGONG NSW
L	IncNet - Marketing Orientations	NORTH SYDNEY NSW
L	Independent Direct Marketing Solutions	ROZELLE NSW
	Informa Australia Pty Ltd	SYDNEY NSW
T	Information Dialling Services Pty Ltd	WATERLOO DC NSW
	Information Technology Mailing Services Pty Ltd	SOUTHPORT
BC	QLD	
	ING Direct	SYDNEY NSW
	ING Marketing & Advertising Pty Ltd	GLEBE NSW
	Innotek Australia Pty Ltd	MUDGEERABA QLD
	Innovations Direct	FRENCHS FOREST NSW
	Insurance Australia Group	SYDNEY NSW
	Insuranceline Pty Ltd	SYDNEY NSW
	Intech Solutions	BONDI JUNCTION NSW
	Integrated Mailing Services	TULLAMARINE VIC
	Integrated Options	THE ROCKS NSW
	International Masters Publishers Pty Ltd	SYDNEY NSW
	Intouch Call Centre Services	MILTON QLD
T	IT Direct Pty Ltd	RYDALMERE NSW
	J.S McMillan Pty Ltd	REGENTS PARK NSW
	Jaeger Fine Papers Pty Ltd	BROOKVALE NSW
	JDA Solutions	JOLIMONT WA
	JMG Marketing (Aust) Pty Ltd	PERTH WA
	Job Find Centre	SYDNEY NSW
	Kinergy Pty Ltd	SURRY HILLS NSW
	Kirin Direct Marketing	MONA VALE NSW
	Kleenmaid Pty Ltd	MAROOCHYDORE SOUTH
QLD		
	Lavender	SYDNEY NSW
	Legends Genuine Memorabilia	CAMPERDOWN NSW
T	Legion Interactive Pty Ltd	EAST SYDNEY NSW
	Lilyfield Printing	REGENTS PARK NSW
	Linda Loose Marketing & Communications	PORT MELBOURNE VIC
T	Link Communications Corporation	MELBOURNE VIC
L	List Marketing Australasia	ELSTERNWICK VIC
	LookSmart Australia	SURRY HILLS NSW
	Lotteries Commission of Western Australia	OSBORNE PARK WA
	Loud Pty Ltd	NORTH SYDNEY NSW
	Loyalty Magic Pty Ltd	MELBOURNE VIC
	M&CSaatchi	SYDNEY NSW
	Magnamail Pty Ltd	BROOKVALE NSW
	Mail Marketing Works Pty Ltd	LANE COVE NSW
	Mailing and Print Services Pty Ltd	FRENCHS FOREST NSW
	Mailmasters Pty Ltd	NORTH SYDNEY NSW
	Make It Happen Pty Ltd	BELROSE NSW
	Manchester Holdings Pty Ltd	WOOLOOWIN QLD
L	Mardev	CHATSWOOD NSW
	Marketability	MELBOURNE VIC
	Marketforce	WEST PERTH WA
L	Marketing Direct Australia Pty Ltd	KEW VIC
	Marketing eServices Pty Ltd	SOUTHBANK VIC

	Marketsoft Services Pty Ltd	CROWS NEST NSW
	Markitforce Pty Ltd	MOOREBANK NSW
	Martin College	SYDNEY NSW
	MasterCard International	NORTH SYDNEY NSW
	McCann Erickson Advertising	FORTITUDE VALLEY
QLD		
	Medecins Sans Frontieres	BROADWAY NSW
	MercerBell Pty Ltd	SYDNEY NSW
	Metropolitan Ambulance Service Victoria	DONCASTER VIC
L	Mezzo Marketing Australia Pty Ltd	NORTH SYDNEY NSW
	Michael Page Sales & Marketing	SYDNEY NSW
	MindWorks Marketing Communications	ULTIMO NSW
	Mission Australia	SYDNEY NSW
	MLC Limited	MELBOURNE VIC
	Moore Gallagher Pty Ltd	ALEXANDRIA NSW
T	Morganisation Pty Ltd	OBERON NSW
	Morris International	BUNDALL QLD
T	MRM Partners Worldwide	WOOLLOOMOOLOO NSW
	Mt Eliza Business School	MELBOURNE VIC
	Multiple Sclerosis Society of Queensland	COORPAROO DC QLD
	National Australia Bank	MELBOURNE VIC
	National Geographic Society	WASHINGTON DC 0
	National Pharmacies	ADELAIDE SA
	NCR Australia Pty Ltd	NORTH SYDNEY NSW
	Nestle Australia Ltd	SYDNEY NSW
	Network Data Management Pty Ltd	SOUTHPORT QLD
	New Internationalist Publications Pty Ltd	ADELAIDE SA
	New Zealand Post International	ALEXANDRIA NSW
	Niagara Therapy Manufacturing (AUST) Pty Ltd	LOGANHOLME D.C
QLD		
	Nickelodeon Australia	SYDNEY NSW
	Noble Systems Australia Pty Ltd	SYDNEY NSW
	Norcross Pty Ltd	MORNINGTON VIC
T	NSP Telemarketing Pty Ltd	AUBURN NSW
	NSW Seniors Card	SYDNEY NSW
	NSW Teachers Credit Union	HOME BUSH NSW
	Nutrimetics International (Australia) Pty Limited	BALMAIN
NSW		
	Offset Alpine Printing Pty Ltd	LIDCOMBE NSW
	On The Pulse Marketing Pty Ltd	ROZELLE NSW
	One 2 One Marketing Pty Ltd	NORTH SYDNEY NSW
	One To One Marketing Communications Pty Ltd	KENT TOWN SA
	Opsm Direct	AUBURN NSW
	Origin Energy	MELBOURNE VIC
	Oxfam Community Aid Abroad	FITZROY VIC
	P & O Princess Cruises International Limited	SYDNEY NSW
L	Pacific Micromarketing	MELBOURNE VIC
	Pacific Publications	MCMAHONS POINT NSW
	Pack One & Post	ROCKDALE DC NSW
	Pathfinder Solutions	MELBOURNE VIC
	Penfold Buscombe	MT WAVERLEY VIC
	Performance Edge Systems	SYDNEY NSW
	Permail Pty Ltd	LANE COVE NSW

Phoenix Society Incorporated	MARLESTON SA
Pinpoint Pty Ltd	BALMAIN NSW
Placard Pty Ltd	BAYSWATER VIC
PMP Distribution / Print	MOORABBIN /
HAWTHORN VIC	
Police & Nurses Credit Society Ltd	EAST PERTH WA
Police Credit	CARLTON VIC
Post Data	OSBORNE PARK WA
Preferred Design Pty Ltd	LABRADOR QLD
L Prime Prospects Pty Ltd	FITZROY VIC
ProVision Eye Care Pty Ltd	PRAHRAN VIC
Publicis Dialog	EAST SYDNEY NSW /
SOUTH BRISBANE QLD	
Qantas Airways Ltd	MASCOT NSW
QAS Pty Ltd	NORTH SYDNEY NSW
QM Technologies Pty Ltd	SOUTH BRISBANE QLD
R.S.L.A. (QLD Branch) War Veterans' Homes Art Union	RED HILL
QLD	
RAC	PERTH WA
RACV	NOBLE PARK NORTH
VIC	
Radio Rentals	PROSPECT SA
RAMS Home Loans Pty Ltd	SYDNEY NSW
Rapp Collins Australia	ULTIMO NSW
RCI Pacific Pty Ltd	GCMC QLD
Reader's Digest	SYDNEY NSW
Recruit Direct	CROWS NEST NSW
ReMark Asia Pacific Pty Ltd	NORTH SYDNEY NSW
Renard	CHIPPENDALE NSW
Resonate Solutions Pty Ltd	NORTH SYDNEY NSW
Response Direct Publishing Pty Ltd	DOUBLE BAY NSW
Response Systems International	DOUBLE BAY NSW
Robe-John & Associates Pty Ltd	HAWTHORN EAST VIC
Ross Direct Recruitment	MCMAHONS POINT NSW
Royal Automobile Association of SA	MILE END SA
Royal Blind Society of	NSW BURWOOD NSW
Royal Children's Hospital Foundation	HERSTON QLD
Royal Doulton Company	GORDON NSW
Royal Flying Doctor Service of Australia (Victorian Section)	
ST KILDA VIC	
Royal Institute for Deaf & Blind Children	PARRAMATTA NSW
Royal Victoria Institute For The Blind	MELBOURNE VIC
Saatchi & Saatchi	THE ROCKS NSW
T Salmat	CHESTER HILL NSW
SAS Institute Australia	LANE COVE NSW
Scenic Tours and Evergreen Tours	SYDNEY NSW
Scholastic at Home	GOSFORD NSW
Securities Institute Education	AUSTRALIA SQUARE
NSW	
Security Mailing Services Pty Limited	KINGSGROVE NSW
Seeing Eye Dogs Australia	KENSINGTON VIC
Select Teleresources	SYDNEY NSW
T Sensis (Telstra phone directories)	FITZROY VIC

	Service Corporation International Australia	CROWS NEST	NSW
	Seton Australia Pty Ltd	REGENT'S PARK	NSW
	Shell Company of Australia Ltd	MELBOURNE	VIC
	Shop-A-Docket Pty Ltd	BRIGHTON-LE-SANDS	
NSW	Shorter Direct	EAST PERTH	WA
	Simm Group Marketing Pty Ltd	SOUTH MELBOURNE	
VIC	Simon Richards Group Pty Ltd	PORT MELBOURNE	VIC
	Simplot Australia Pty Ltd	CHELTENHAM	VIC
	Singtel Optus Pty Limited	NORTH SYDNEY	NSW
	Sirius Telecommunications	MELBOURNE	VIC
T	Smart Health Australia (Aust)	BALACLAVA	VIC
	South Australian Tourism Commission	ADELAIDE	SA
	Spark Brand Communications Pty Ltd	ULTIMO	NSW
	Spicers Envelopes	PRESTON	VIC
	St George Bank	KOGARAH	NSW
	Star City Casino	SYDNEY	NSW
	State Library of NSW Foundation	SYDNEY	NSW
T	Stellar Call Centres Pty Ltd	NORTH SYDNEY	NSW
	Sterling Mail Order Pty Ltd	PYMBLE	NSW
	Storepack Fulfilment	WETHERILL PARK	NSW
	Suncorp Metway Ltd	BRISBANE	QLD
	Sunsuper Pty Ltd	MILTON	QLD
	Sydney Swans Limited	PADDINGTON	NSW
	Synchro Marketing Australia Pty Limited	NORTH SYDNEY	NSW
	Tactics Marketing Pty Ltd	BROOKVALE	NSW
	Tactix Creative Pty Ltd	NORTH MELBOURNE	
VIC	Tattersalls Gaming Pty Ltd	MELBOURNE	VIC
	Telstra Corporation Ltd	MELBOURNE	VIC
	Telstra Super Pty Ltd	MELBOURNE MAIL	
CENTRE	VIC		
	Tesselaar Bulbs & Flowers	SILVAN	VIC
	Text Pacific	PYRMONT	NSW
	The Age Company Ltd	MELBOURNE	VIC
	The Australian Kidney Foundation	ADELAIDE	SA
	The Bakery Marketing Communications	ST LEONARDS	NSW
	The Benevolent Society	PADDINGTON	NSW
	The Brand Agency	WEST PERTH	WA
	The Cancer Council	KINGS CROSS	NSW
	The Clark Alliance	WOOLLAHRA	NSW
	The Direct Partnership Pty Ltd	ARTARMON	NSW
	The Federal Publishing Company	ALEXANDRIA	NSW
	The Fred Hollows Foundation	BURWOOD	NSW
L	The Great Australian List Company Pty Ltd	TERRIGAL	NSW
	The Intelligent Investor	BONDI JUNCTION	NSW
L	The List Bank Pty Ltd	NORTH SYDNEY	NSW
	The Loyalty Factor	ADELAIDE	SA
L	The Mailing List Centre	SPIT JUNCTION	NSW
	The Mailing Professionals	SCMC	NSW
	The Marketing Business Pty Ltd	BENDIGO CENTRAL	
VIC			

	The Marketing Department Group	ST LEONARDS NSW
	The Marketing Store Worldwide	ULTIMO NSW
	The Moulton Agency	THE ROCKS NSW
L	The Prospect Shop Pty Ltd	WOOLLAHRA NSW
	The Quantum Group Pty Ltd	SYDNEY NSW
	The Right Mix Pty Ltd	ADELAIDE SA
	The Royal Automobile Club of Queensland Limited	BRISBANE QLD
	The Salvation Army (Southern Territorial Headquarters)	MONT
ALBERT	VIC	
	The Smith Family	CAMPERDOWN NSW
	The Spastic Centre of New South Wales	BROOKVALE NSW
	The Wedgwood Collectors Society	CASTLE HILL NSW
	The Wine Society	MELBOURNE VIC
T	Thomas Direct Pty Ltd	RUNAWAY BAY QLD
	ThompsonConnect Worldwide	SYDNEY NSW
	Thomson Education Direct	ARTARMON NSW
	Tibet Direct	CHIPPENDALE NSW
	Ticketek	SYDNEY NSW
	Time Inc. Magazines	MILSONS POINT NSW
	Time Life Australia	SYDNEY NSW
	TKTS Pty Ltd	NORTH SYDNEY NSW
	TMP/Hudson Global Resources	SYDNEY NSW
	Tolemy Communications (Australia) Pty Ltd	CROWS NEST NSW
	Tonic Communications	GLEBE NSW
	Top Gear Pty Ltd	SILVERWATER NSW
	Toppik Pty Ltd	MIDDLE PARK VIC
	Torque Solutions	MCMAHONS POINT NSW
	Total Advertising & Communications Pty Ltd	PYRMONT NSW
T	Touch Point Solutions	NEWCASTLE NSW
	Tourism Tasmania	HOBART TAS
	Tower Australia Ltd	MILSONS POINT NSW
	TrademarkDM Pty Ltd	MELBOURNE VIC
	Trading Post Australia Pty Ltd	PARRAMATTA NSW
	Transamerica Direct Marketing Australia Pty/Ltd =	
	= Transamerica Insurance Marketing Asia Pacific	SYDNEY NSW
	Trendwest Resorts South Pacific	GOLD COAST MAIL
CENTRE	QLD	
	Triad Promotional Marketing Pty Ltd	DRUMMOYNE NSW
	TXU Pty Ltd	MELBOURNE VIC
	Vickerman Direct Pty Ltd	SYDNEY NSW
	Viking Office Products Pty Ltd	RYDALMERE NSW
	Virtual Communities	MELBOURNE VIC
	Visible Results Australia Pty Limited	SYDNEY NSW
	Vision Australia Foundation	BRIGHTON VIC
	VisitBritain	NORTH SYDNEY NSW
	Vodafone Australia	CHATSWOOD NSW
	WA Sports Centre Trust	CLAREMONT WA
	wam Advertising	SOUTH MELBOURNE
VIC		
	Wentworth Mutual	PERTH WA
L	White Horse Direct Marketing	WEST END QLD
	Whybin Lawrence TBWA	PYRMONT NSW
	Wine Directions Australia Pty Ltd	ADELAIDE SA

Witness Systems	NORTH SYDNEY NSW
World Class Direct Mail	PORT MELBOURNE VIC
World Vision of Australia	BURWOOD EAST VIC
WSPA Australia Limited	ST LEONARDS NSW
Wunderman Pty Ltd	NORTH SYDNEY NSW
X-Beam Australia Pty Ltd	CASTLE HILL NSW
L Xpedite Systems Pty Limited	SYDNEY NSW
Young Direct Pty Ltd	NORTH SYDNEY NSW
Z-Card Asia Pacific	ALEXANDRIA NSW
Zebra Direction	RICHMOND VIC
Zoological Parks Board of NSW	MOSMAN NSW

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