

Blink Mobile Technologies

Comms Alliance response/submission MPS Code Review

30 June 2010

These comments follow a submission made by this same email form during the month of June 2010.

Our company is involved in a wide range of mobile application and mobile services development for Government, Education and Corporate. We are not servicing the consumer market (at least not directly) and we are not in the business of subscription services and undesirable business practices.

We operate one Mobile Service using a premium number (199 22767) and we offer this service as a free community notice board for use by groups such as schools, junior sports clubs and other community based organisations.

These groups gain great value from the service as it provides them a low/no cost way for their members to retrieve changing info (on such things as wet weather, venue/time changes, etc) . The sorts of things that would normally have them glued to the phone for hours. We have over 600 such organisations using this service over many years. Our clients all speak highly of the service, recommend it to their peers and we have even received national Innovation Awards from ATUG for the service.

Its not a subscription model, users interact with the service each time they require a piece of updated information. They do so knowingly and willingly and we have maintained the premium charges at the min charge of .55c. We do not hold their phone numbers nor do we send them any info or sell their details to any other party. Our primary business is our corporate market and this service is essentially our contribution to deserving groups who cannot afford a commercial service, we ensure we don't muddy our corporate reputation by doing anything even slightly disreputable within the bounds of the 199 22767 service.

Our issue of late has been the overly rigorous scrutiny of how the client organisations (the 600 or so schools and junior sports clubs) inform their members about the service. Applying 'rules' of font size, location, pricing information, etc as if it was a service trying to dupe users into subscribing for something misleading.

Our service clearly does not do that, and also clearly provides a public service.

As it's a service that the community groups register for and then communicate to their own members we do not have direct control over what they put on their websites, newsletter, flyers, etc. We would contend however that based on its operating practices, usage and the fact that each interaction by a consumer is knowingly initiated by them and that the fee/charges are always declared somewhere (and we have no consumer complaints). Then this valuable community service should not be put in jeopardy of closing (as has been threatened by some Telcos), purely because it doesn't comply with the letter of the law set up to eliminate practices which it doesn't even undertake.

I would also welcome the opportunity to put our case forward in person during this review process.

Darren Besgrove

Director

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