

11 November 2013

The Executive Director
Australian Law Reform Commission
GPO Box 3708
SYDNEY NSW 2001
By email: privacy@alrc.gov.au

Dear Sir or Madam,

RE: Serious Invasions of Privacy in the Digital Era

Communications Alliance welcomes the opportunity to respond to the Australian Law Reform Commission's Issues Paper 'Serious Invasions of Privacy in the Digital Era'.

Communications Alliance's members take very seriously the protection of personal information supplied to them by their customers.

Communications Alliance notes that the existing privacy and other laws provide significant consumer protections for serious invasions of privacy.

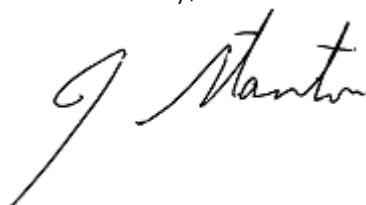
Communications Alliance has little confidence that the introduction of a cause of action for serious invasion of privacy will result in any additional benefit to the majority of individuals beyond the range of remedies already available to people who believe their privacy has been invaded in a serious manner.

Further, some of the perceived gaps in privacy law will diminish from next year. That is, from March 2014, the Privacy Commissioner's enforcement powers will increase and the Commissioner will be able to impose significant civil penalties against organisations for breaches of privacy.

Communications Alliance is also concerned that the introduction of a statutory cause of action is likely to have adverse consequences and result in an additional and unnecessary regulatory burden on business. There is a risk that the introduction of a cause of action will encourage litigation, including spurious claims, causing uncertainty and additional expense for business.

Communications Alliance welcomes the opportunity to engage in a more detailed discussion of these matters subsequent to the Discussion Paper being released in February 2014. At this time, Communications Alliance will engage, in detail, in the privacy issues of specific relevance to the telecommunications industry.

Yours sincerely,



John Stanton
Chief Executive Officer