



## Public Consultation Document

**Telstra Reference No: 44761**  
**Payphone ID: 02926707X2**  
**Address: Outside 197 Elizabeth Street, Sydney NSW 2000**

It is proposed that a card and coin payphone be removed from outside 197 Elizabeth Street corner Park Street, Sydney NSW 2000.  
(Payphone ID: 02926707X2).

The next nearest card and coin payphone is located in Hyde Park, 120 Elizabeth Street corner Park Street, Sydney NSW 2000 (Payphone ID: 02928330X2) which is approximately 20 metres away from the current site.

Telstra intends making a final decision on this proposal by the **27th April 2021**.

**Table 1:  
Legislative  
requirement  
Paragraph  
13 (1) (b) of  
the Payphone  
Public  
Consultation  
Determinatio  
n**

**Public Consultation Document—when maintaining the payphone at the site would not deliver a net social benefit to the local community**

**i) Telstra’s reasons for the payphone removal proposal including facts upon which the proposal is based**

**Why we are proposing to remove this payphone**

Telstra response:

Social benefit assessment (see ii below)	Increased likelihood of providing a social benefit outcome	Decreased likelihood of providing a social benefit outcome	Not applicable <sup>1</sup>
No. 1		✓	
No. 2		✓	
No. 3	✓		
No. 4	✓		
No. 5	✓		
No. 6		✓	
No. 7		✓	
No. 8	✓		
No. 9		✓	
No. 10		✓	
No. 11	✓		

**ii) to the extent that it is available, and it is reasonable for Telstra to disclose it, evidence proving those facts**

**Evidence to prove the facts upon which this proposal is based**

**Social benefit assessment no. 1:** Whether Telstra made a total net profit or total net loss (from operating the payphone) in the most recent 12 months from the date of assessment, and a description of the ‘reasonable steps’ that Telstra has taken to minimise the costs of maintaining the payphone, which may include the installation of a robust phone or card-only phone.

Telstra response:  
This criteria is rated as Negative.  
The total net profit for this payphone for the most recent 12 months was negative.  
The payphone is located in a CBD area and has very minimal use.  
In the most recent 12 months, the payphone had no report of vandalism and had below national average faults reported. This payphone meets our current build standard.

**Social benefit assessment no. 2:** The total volume of calls for the most recent 24 months from the date of assessment, broken down into two 12-month periods.

Telstra response:  
This criteria is rated as Negative.  
The total volume of calls for the most recent 12 months = 148.  
The total volume of calls for the 12 months prior = 283.  
Total call volumes have declined over this 24-month period.

<sup>1</sup> In some cases, social benefit assessments 4, 10 and 11 may not apply. For further information, please refer to the [Payphone \(Assessment of Net Social Benefit\) Guidelines](#).

**Social benefit assessment no. 3:** Whether the revenues from the payphone ‘will cover’ or ‘will not cover’ the depreciation and maintenance cost of maintaining the payphone on an annual basis.

Telstra response:

This criteria is rated as Positive.

The revenue from the payphone will cover the depreciation and maintenance cost of maintaining the payphone on an annual basis.

**Social benefit assessment no. 4:** Whether the funding (if any) provided to install or maintain the payphone, including any payments made to Telstra by the Commonwealth ‘will cover’ or ‘will not cover’ the depreciation and maintenance cost of maintaining the payphone on an annual basis.

Telstra response:

This criteria is rated as Positive.

The funding for this payphone will cover the depreciation and maintenance cost of maintaining the payphone on an annual basis.

**Social benefit assessment no. 5:** The name (if known) and type of each of the applicable community facilities or the name of any national parks located within a one-kilometre radius of the proposed payphone removal site.

Telstra response:

This criteria is rated as Positive.

There are many community facilities within one-kilometre radius. These include but are not limited to a School, Convenience Stores, Health Care Services, Sports Centre, Supermarkets, Bus Stop, Place of Worship and General Practitioner.

**Social benefit assessment no. 6:** The applicable decile<sup>2</sup> the community falls into (for the purpose of this assessment) and a hyperlink to the specific source of this information.

Telstra response:

This criteria is rated as Negative.

The ABS data shows this community is rated as a Decile 7.

<http://www.abs.gov.au/AUSSTATS/abs@.nsf/DetailsPage/2033.0.55.0012016?OpenDocument>

**Social benefit assessment no. 7:** Whether the proportion of the community—relative to the applicable state/territory average—that is aged 65 years or over is ‘above average’ or ‘below average’ and a hyperlink to the specific source of this information.

Telstra response:

This criteria is rated as Negative.

The ABS data shows the population of this community as having 4.82% of residents greater than 65 years which is below the state average of 14.73%.

<http://www.abs.gov.au/websitedbs/censushome.nsf/home/Census>

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<sup>2</sup> ‘Decile’ means any one of the numbers or values in a series dividing the distribution of the individuals in the series into 10 groups of equal frequency. The [Payphone \(Assessment of Net Social Benefit\) Guidelines](#) provide that for the purposes of social benefit assessment no. 6, Telstra should have regard to the Socio-Economic Disadvantage Index (prepared by the Australian Bureau of Statistics). This index is suburb based and derived from the most recent Australian census variables related to disadvantage, such as low income, low educational attainment, unemployment, and dwellings without motor vehicles.

iii)

**Social benefit assessment no. 8:** Whether the proportion of the community—relative to the applicable state/territory average—that is aged between 15 and 24 years is ‘above average’ or ‘below average’ and a hyperlink to the specific source of this information.

Telstra response:

This criteria is rated as Positive.

The ABS data shows the population of this community as having 23.67% of residents aged between 15 to 24 which is above the state average of 12.91%.

<http://www.abs.gov.au/websitedbs/censushome.nsf/home/Census>

**Social benefit assessment no. 9:** Whether there is adequate mobile phone coverage<sup>3</sup> at the payphone site or no mobile phone coverage at the payphone site, and either a hyperlink to Telstra’s mobile phone network coverage map (the payphone site address details must be located next to the hyperlink) or the date on which Telstra tested the mobile phone coverage at the payphone site which must not be more than 3 months prior to the date the assessment is made.

Telstra response:

This criteria is rated as Negative.

There is adequate mobile coverage of all carriers is present in this locality.

<http://telstra.com.au/mobile-phones/coverage-networks/our-coverage/coverage-search/index.htm> (Payphone site address: 197 Elizabeth Street, Sydney NSW 2000).

<http://www.optus.com.au/network/mobile/coverage>

<http://www.vodafone.com.au/aboutvodafone/network/checker>

**Social benefit assessment no. 10:** The distance in metres or kilometres (whichever is appropriate) to the next nearest Telstra-operated payphone, and a website address or hyperlink to the ‘Telstra Public Payphone Locator’ that shows the next nearest TELSTRA-operated payphone.

Telstra response:

This criteria is rated as Negative.

The next nearest Telstra-operated payphone is located approximately 20 metres away from this location.

<http://envinsaonline.mapinfo.com.au/ppol/>

**Social benefit assessment no. 11:** The total number of genuine emergency calls<sup>4</sup> from the payphone concerned for the most recent 12 months from the date of assessment.

Telstra response:

This criteria is rated as Positive.

Six genuine emergency calls were made from this payphone in the most recent 12 months.

<sup>3</sup> The Payphone Location Determination defines ‘adequate mobile phone coverage’ as handheld terrestrial mobile phone coverage at street level in the relevant place or area. Mobile coverage maps are available on most service providers’ websites.

<sup>4</sup> For the purpose of these guidelines, a ‘genuine emergency call’ is an emergency call connected by the Emergency Call Person for Triple Zero (000) or 112 (currently Telstra) to an Emergency Service Organisation.

iv) a statement about which criteria under paragraph 20 (1) (b) of the Payphone Location Determination are considered to apply to the proposed payphone removal

### The criterion that applies to this proposed payphone removal

Telstra response:

This payphone does not deliver a Net Social Benefit to the community.

v) details of how a person can complain about the proposed removal of the payphone

### How a complaint (or a request for further information) may be made

Telstra response:

*Should you wish to make a complaint regarding the decision, it must be made within 20 working days of the final decision which will be posted on the Telstra Payphone website. Complaints can be made through the*

Telstra Payphone Siting Manager  
Locked Bag 4850 Melbourne Vic 3001  
or by calling us on 1800 011 433 selection Option 2  
or email [Payphones@team.telstra.com](mailto:Payphones@team.telstra.com)

*To make a written objection to the ACMA regarding a Telstra payphone complaint, it must be within 10 working days from when the primary universal service provider provided its written response to the complaint*

<https://www.acma.gov.au/payphones>

Telstra advises that the personal information of the complainant may be disclosed to the ACMA for the purpose of resolving the objection.

vi) notification, for the purposes of the Privacy Act 1988, that should a person make a complaint, Telstra may be required to disclose the complainant's personal information (as contained in the complaint) to the ACMA

### Notification for the purposes of the Privacy Act 1988

Telstra response:

Telstra advises that the personal information of the complainant may be disclosed to the ACMA for the purpose of resolving the objection.