**How and Why Technology Based Service Organizations Act Together:
Emerging Organization Fields in the Australian Internet Service Provider (ISP)
Industry**

**ABSTRACT***: This paper uses institutional theory of Organization Field to analyse the recent collaborative efforts of the Australian Internet industry stakeholders to address customer service (CS) and complaints handling (CH) concerns. The study adopted a qualitative research approach and interviewed eleven senior executives in key positions in the Internet industry. Major findings are: 1) Vigorous collaboration amongst the institutional actors has led to emergence of Organization Fields 2) The actors of the Emerging Fields actively influence the development/review of the CS/CH practices and its subsequent implementation in ISPs 3) there is potential for Emerging Fields to mature over time to inform future CS/CH practices and 4) there are implications for CS/CH performance of the ISPs and Internet consumer protection.*

**Keywords:** attitudes, decision making, group dynamics, group processes, managerial thinking and cognition, organizational culture.

### STUDY BACKGROUND

Customer Service (CS) and Complaints Handling (CH) performance of the Australian Internet Service

Providers (ISPs) industry generated heated debate amongst  ISP industry stakeholders during 2008-

2011 following serious concerns expressed by telecommunications regulator, ombudsman and Internet

consumers about the failure of ISPs to live upto customer expectations (ACMA, 2011). CS is the

'*provision of service to customers before, during and after a purchase*' (ACCAN, 2011). CH is '*an*

*expression of dissatisfaction related to an organization's products, services or the complaints*

*handling process itself*' (ACMA, 2011). CS/CH concerns forced the industry stakeholders to

frequently interact with each other. Institutional theory of Organization Field provides an opportunity

to study such issue-based coming together of stakeholders. Several definitions of Organization Field

exists (Wooten & Hoffman, 2008; DiMaggio & Powell, 1983; Barley, 2010). Scott (2001) states that

Organization Field is  '*a collection of varying types of organizations, their suppliers, customers, and*

*regulators that are formed around a common issue'*. This definition is used in this paper.

Hoffmann (1999) highlighted that '*field should be thought of as the center of common channels of*

*dialog and discussion [...] which bring together various field constituents with disparate purposes*'.

The focus is on the debate the relevant actors engage in and similar interests they share to acheive

specific goals. Field emerges as a result of the negotiation through dialog on the central issue. The

structure becomes organized as the interactions among various organizations develop and they are

recognized as participants in the same debate. The field is formed by organizations intensively involved in the debate and concerned with the production and reproduction of specific set of practices related to the focal issue. These practices then become a part of the institutional arrangement (Scott, 2001; DiMaggio et al., 1983). Zietsma & Winn (2005) state that such an issue-based coming together is more suitable for analysis of emerging Organization Fields (dynamic in nature and experiencing flux which applies to ISP industry). **Table 1** shows the field level analysis relevant to this study. This paper uses Institutional theory of Organization Field to study and examine the recent collaboration developments in the Australian very large ISP (vLISP) industry. First, the stakeholders in the Australian vLISP industry are discussed. Then, a justification for the focus on CS and CH practices and on vLISPs is provided. The 'Trigger Events' that contributed to the intensification of CS/CH debate is summarised. Research design and methodology used is described. Major research findings and the factors that influence CS/CH in vLISPs are analysed. Then, the argument that there are emerging Organization Fields in the Australian vLISP industry which are in their embryonic stages of development is made.

## AUSTRALIAN ISP INDUSTRY STAKEHOLDERS

The key stakeholders that develop CS/CH practices of the ISP industry are: 1) **Industry association:** Communications Alliance (CA) 2) **Regulator**: Australian Communications and Media Authority (ACMA) 3) **Consumer association:** Australian Communications Consumer Action Network (ACCAN) 4) **Top four very large ISPs** interviewed in this study 5) **Government department for broadband**: Department of Broadband, Communications and the Digital Economy (DBCDE) and 6) **Telecommunications Industry Ombudsman** (TIO) (Communications Alliance, 2011).

## CS/CH PRACTICES AND TCP CODE

The CS/CH practices of the Australian vLISP industry are defined in the **Telecommunications Consumer Protection** (TCP) Code, a co-regulatory code developed by *Communications Alliance* in consultation with other key stakeholders. von der Heidt & Charles (2009) define co-regulation as '*a system in which some of the responsibilities for regulatory development, implementation and/or enforcement are shared between industry groupings and governments*'. TCP code covers information on pricing, terms and conditions, billing, customer transfer, CS, credit management, contracts and CH.

Once the code is developed, it is registered with the regulator and comes into effect. The *old TCP code* (TCP code 2007) was superseded by the *revised TCP code* (TCP code 2012) which came into effect on 1st of September 2012. Vigorous collaborations occurred amongst the stakeholders in 2010/11 during code review to address CS and CH deficiencies in the old TCP code. The research study focused on top four vLISPs in Australia. Justification for this focus is provided in **Table 2**.

### 'TRIGGER EVENTS' THAT INTENSIFIED REACTION TO SYSTEMIC CS/CH ISSUES

Several events unfolded during 2008-2010 which are the 'Trigger Events' that boosted the seriousness of CS/CH issues. A steady increase in CS/CH complaints recorded by the TIO (accounting for the proportion of complaints against the number of subscribers), ministerial intervention (press releases directed towards industry to uplift CS/CH performance) and consumer research reports that highlighted the inability of the existing regulatory arrangements to deal with systemic CS/CH issues (refer **Table 3**). The regulator's authority to enforce the old TCP code was limited as the code did not have clear compliance/enforcements mechanisms. As a result many vLISPs adopted the code as they saw fit, which led to superficial conformance (discrepancy between formal and actual CS/CH processes implemented within vLISPs). ISPs regularly breached the code as there were no penalties associated with non-compliance. Such attitudes did not drive the right behaviour in the industry and resulted in poor service outcomes for Internet customers. The regulator launched an inquiry in 2010 known as RTC (Reconnecting the Customer) inquiry on CS/CH practices (18 months investigation) as a direct response to stakeholder concerns. The inquiry confirmed that the vLISPs failed to meet customer expectations on CS/CH.  As a result the vLISP industry was directed to address the deficiencies in the old TCP code based on the inquiry recommendations (ACMA RTC Inquiry Report, 2011).

### SUMMARY OF RESEARCH APPROACH

The main research question is: *What do the collaborative efforts of the institutional actors of the Australian very large ISP industry inform us about their collective role in influencing the CS/CH practices of the industry?*. This study used exploratory qualitative research methodology to study the collaborative efforts that occurred in the ISP industry to improve TCP code and subsequent CS/CH practices. Eleven senior executives from key stakeholder organizations were interviewed between

November 2011-October 2012 after obtaining university ethics approval. Thematic analysis was used for analysing data collected from interviews (Creswell, 2007). The benefit of thematic analysis lies in its flexibility of use (Braun & Clarke, 2006). It provided opportunities to understand and reveal collaborative relationships between key institutional actors, make sense and meaning of dynamics of relationships and how it influences the CS/CH practices of the ISP industry (Scott, 2001). Interview participants had experience between seven to forty years in dealing with CS, CH, regulatory compliance with TCP code and were the point of contact between their organization and external agencies. *Purposive sampling* was used as all participants were required to be in certain positions within the organization to provide the right perspective required for this study. Profile of the research participants is presented in **Table 4**. For privacy reasons, codes are used to identify participants and organizations they represent.

## MAJOR RESEARCH FINDINGS

### Research finding 1

The study revealed that there are **key agencies** (*regulator, ombudsman, industry association, consumer association and government department for broadband*) and **central actors** (*all actors interviewed in this study*) that operate in the institutional environment of Australian vLISPs who influence the development, review and revision of the industry's TCP code for CS and CH practices. Data analysis found that **Regulatory pressure** (*pressures exerted by regulator through enforcement actions/ directions to comply*) is the **dominant pressure** operating in the Australian vLISP industry. The regulatory managers from vLISPs responded to pressures because of increased regulatory activities over the last few years (regulator inquiry, consumer issue forums), pressures from multiple constituents to address CS/CH concerns and the real threat of tighter regulation. Their response to pressures was dependent on who exerted the pressure and under what circumstances those pressures were exerted (DiMaggio & Powell, 1991; Oliver, 1991). Please see [Q4] quote in **Table 6.**

An **issue-based coming together** of the institutional actors (in 2010 and 2011) occurred as a direct response to collective pressures placed on vLISPs by multiple constituents. This led to increased engagement, collaboration and negotiations between regulatory managers of vLISPs and relevant stakeholders to address deficiencies in the CS/CH arena. Detailed analysis of institutional pressures

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in the vLISP industry and vLISPs' response to pressures is discussed in (Vilapakkam Nagarajan, 2012a). Frequent and fateful interactions amongst the institutional actors of the vLISP industry led to significant improvements in the revised TCP code in areas such as code compliance/enforcement, CS, CH, billing, point of sale matters and establishment of independent body to oversee the industry's code compliance and CS/CH performance. **Table 5** lists code improvements**.** The introduction of the revised TCP code and subsequent implementation has implications for consumer outcomes. The recent example of collaborative work by central actors during code review/revision in 2010/11 demonstrates the need for industry wide input to address CS/CH problems. This re-emphasises the notion of central actors working as active agents in informing CS/CH practices of the vLISP industry. Therefore, *CS/CH practices of the very Large ISP industry are institutionally derived practices.* Detailed discussion in (Vilapakkam Nagarajan, 2012b).

**Research finding 2**

Key criteria for *Organizational field* (DiMaggio et al., 1983; Scott, 2001) are: 1) Pattern of interactions and collaborations among stakeholders 2) Representation (collaboration involving a new coalition in which collaborative organizations represented each other interests to outside parties) 3)Information flow exchange and the development of a mutual awareness that they are involved in a common debate and 4) Involvement and embeddedness**.** Application of these criteria to the study findings revealed that there are two emerging organizational fields comprising of regulatory managers of vLISPs and other central actors. The actors identified in these Emerging Fields actively influence the CS/CH practices (as stated in the revised TCP code) and the subsequent implementation of these practices. These practices translate into CS/CH performance when implemented within individual ISPs. When vLISPs are exposed to continuous exogenous shocks due to regulatory developments and technological growth there is a need for ongoing commitment from regulatory managers of vLISPs to express their collective interests on regulatory arrangements, maintain good relationship with external stakeholders and seek external stakeholders' active support to influence CS/CH practices of the vLISP industry. Importance of CS and CH will increase in the future following the introduction of NBN (National Broadband Network) where absence of monopoly over network infrastructure and increase in multitude of services provided over broadband platform (health, education, retail) necessitates

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vLISPs to compete through service quality differentiation as opposed to infrastructure differentiation (NBN, 2013; ACCAN, 2011). Intensification of collaboration amongst these actors to handle CS/CH challenges will fuel further field development which will inform future CS/CH practices  and consumer protection policy arrangements for the vLISP industry. This necessitates a longitudinal study of the field development from its emerging to mature state to understand the structuration of the field.  Subsequent sections discuss *research finding 2* in detail.

## FACTORS INFLUENCING CS AND CH IN vLISPs

1) **TCP Code**: The ability of the TCP code to deal with CS/CH issues has implications for the CS/CH performance of the individual vLISPs. This is illustrated by **[Q1]** participant quote in **Table 6.**

 2) **Penalties and Code enforcement mechanisms** (regulatory compliance with the code): The success of any code depends on how efficient the compliance mechanisms and the checks are in enforcing the agreed to codes of practice. According to study participants, the *old TCP code* was inefficient in handling code compliance, enforcement or monitoring/penalties which contributed to poor outcomes for the customers. This is illustrated by **[Q2]** participant quote in **Table 6**.

 3) **Complexity in products and services:** As the complexity in Internet products and services/ technologies increases, vLISPs have to use more simple and clear pre-sales information to ensure customers have all the relevant information to choose the products/services that best suits their needs. When providers fail to deal with customer-oriented issues while selling their new products and technologies, their CS performance is affected because of the customer complaints that may arise from customers who are not fully aware of what they are purchasing and whether it best suits their needs.

4) **Competition politics:** vLISPs who participated in this study believe that CS is key to winning competition to both gain new customers and retain existing customers.

5) **Organization culture and attitude towards CS/CH practices***:* ISP management attitudes towards CS (cost or profit factor) in general plays a crucial role in influencing how the CS practices in the TCP code are implemented within individual vLISPs. The challenge is that there are no direct financial benefits noticeable from CS investments. This can influence the vLISP's response to CS/CH issues they face. Thus, organization culture towards CS has implications for their CS performance.

**DISCUSSION OF EMERGING ORGANIZATION FIELDS IN ISP INDUSTRY**

**How and Why Central Institutional Actors of ISP industry Came Together?**

DiMaggio & Powell (1991) showed that fields emerge when '*interacting actors begin to pay attention to problems of collective rationality'*. Signs of collective rationality among vLISP organizations developed following the attention on the focal issue of poor industry-wide CS/CH performance. The vLISPs, regulator, government agency, ombudsman, industry association and the consumer association contributed to the debate on how to address the problems facing the industry. Because the industry reputation as a whole was at stake and the threat of tighter regulation was imminent, all the vLISPs were drawn together to form relational links that never existed before. Study participant response **[Q3]** in **Table 6** demonstrates the response of ISPs to avoid excessive regulation.

The central actors who influence the CS/CH practices in the industry include the regulatory managers of four vLISPs, regulator executive, consumer advocate, ombudsman executive, industry association executive and government department executive. These actors engaged in TCP code review activities, are represented in working committees on code review, board members of industry association, regulatory agency, ombudsman and attend frequent meetings in industry conferences/consumer forums to discuss CS/CH issues. The central actors are defined by *'position title'* in organizations they represent. All the actors interviewed in the study (example: Regulator managers in vLISPs) have extensive Telecommunications industry experience (varies between seven years to forty years) and interact with other ISP industry stakeholders as their position requires them to do so.

**Events that triggered processes that drive field evolution**

Lampel & Meyer (2008) define Field Configuring Events (FCEs) as, '*temporary social organizations such as tradeshows, professional gatherings, technology contests, and business ceremonies that encapsulate and shape the development of professions, technologies, markets and industries'*.

FCEs act as a platform to '*transform a disparate set of organizations and individuals into a 'community of organizations that partake of a common meaning system'* (Scott, 2001). In the vLISP industry FCEs helped members to become involved in defining CS/ CH practices and setting standards in relation to acceptable level of service in the TCP code. Meyer, Gaba & Cowell (2005) state that

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FCEs such as industry forums, working groups/committees provide unique social space for institutional actors. Such events help *'actors from diverse social organizations to assemble temporarily with the conscious, collective intent to construct an Organization Field'* (Meyer et al., 2005). Main FCEs in the vLISP Industry were: TCP Code Review Steering Committee &Working Committee; ACCAN Conferences 2009-2012; TIO Board Meetings/Workshops; Communication Alliance Board meetings and networking with vLISPs. These events provided social spaces for institutional actors to come together, explore central issues, build collective understanding and mobilise collective action on CS/CH issues (Garud, 2008; Lampel et al., 2008).

## APPLICATION OF EMERGING FIELD CRITERIA TO THIS STUDY

There are two Emerging Fields in the Australian ISP industry. **Emerging Field 1** comprises of actors from regulatory agency, government department, ombudsman, consumer association, ISP industry association and four vLISPs. **Emerging Field 2** comprises of Industry association actor and regulatory managers in four vLISPs. **Figures 1 & 2** show the diagrammatic representation of Emerging Fields 1 and 2 respectively.  There is a link between the Emerging Fields, its actors and the factors influencing CS/CH performance of the industry because the actors of the Emerging Fields are actively involved in determining CS/CH practices, its implementation, monitoring, enforcement and agreeing to acceptable levels of CS/CH performance based on the TCP code. The field emergence criteria are now described.

**1) Pattern of interactions and collaboration among stakeholders**: Study participants provided insight into how frequently and with whom they interacted with to discuss CS/CH issues. During the TCP code review process in 2010/11, the number of interactions both formally and informally amongst the all industry stakeholders increased considerably. These interactions amongst actors were productive because of the thematic consistency focussed on CS/CH issues. Another reason why the collaboration and frequent interactions between the actors were initiated and occurred is because there was a joint benefit (avoiding excessive regulation) that might otherwise prove too difficult to achieve by individual actors. A sample quote [Q6] is in **Table 6**. Using Lawrence, Hardy & Phillips's (2002) definition for depth and scope of interactions, interactions within the vLISP industry could be '*deep*' or '*shallow*'. Deep interactions occur when vLISPs interact with industry association, regulator and

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ombudsman to discuss CS issues/ TCP code. Shallow interactions occur when consumer association interacts with vLISPs to provide feedback on CS issues.

Collaboration is defined as '*cooperative interorganization relationships that is negotiated in an ongoing communicative process and relies on neither market or hierarchical mechanisms of control*' (Lawrence et al., 2002; Phillips, Lawrence & Hardy, 2000). Lawrence et al. (2002) further refine this definition to suggest that collaboration is more than interorganizational relationships that are cooperative and state that cooperation could either be purchased (or) based on some form of legitimate authority (for example, regulator). Such a definition is critical to understanding the stakeholder collaboration in vLISP industry. Stakeholder collaboration comprised of elements based on both cooperation (between ISP industry association and vLISPs) and authority (regulator). All the industry players came together under the leadership of ISP industry association to address CS/CH problems through revisions to the TCP code and to determine acceptable CS/CH practices, strong enforcement and compliance mechanisms. Sample quote is available in **[Q5] Table 6.** A vLISP [O7] in its submission to the code review paper to the industry association highlight their genuine commitment to collaborate with other industry players to improve the CS reputation of the industry.

[O7] submission states, '.. *[O7] has been a very active participant in Communications Alliance [CA] processes that pre-ceded the CA issues paper, particularly the first stakeholder meetings held on the 21 May 2010. ..We will continue to work as one of the two nominated industry participants on CA steering group charged with managing the TCP code review. Customer service is fundamental to everything we do... We see customer service as a differentiator in a competitive market and industry arrangements should encourage providers to compete on the basis of service*'

**2) Representation (collaboration involving a new coalition in which collaborative organizations represented each other interests to outside parties):** The vLISPs and the industry association collaborated on CS/CH issues to send a clear signal to the regulator not to further regulate the industry. They responded to salient stakeholder concerns on the inadequacy of the current compliance mechanisms. They agreed to the formation of an independent Communications Compliance (CC) committee in the revised TCP code that will oversee compliance mechanisms and be empowered to undertake compliance scrutiny. Hence, a representation taking the form of a collaboration involving a new coalition where all organizations represented each other's interest to other stakeholders unfolded in the Australian vLISP sector. Please see [Q7] sample quote in **Table 6.**

**3) Information flow exchange and the development of a mutual awareness that they are involved in a common debate:** The study data revealed evidence of increased CS/CH related information exchange amongst vLISP industry stakeholders. According to Lawrence et al. (2002) information flow amongst stakeholders can be unidirectional (occurs when one of the collaborating organization learned from the other), bidirectional (occurs when all collaborating partners learned from each other) (or) multidirectional (occurs when all collaborating organizations and the third parties learned from each other). Study data shows that while some conversations were bidirectional (for example, communication between regulator and vLISPs) others were unidirectional (ombudsman providing CS/CH complaints data to vLISPs). Sample participant quote [Q8] is provided in **Table 6.**

**4) Involvement and embeddedness:** The institutional actors from various stakeholder organizations worked collaboratively to discuss and act upon CS/CH concerns. Information flowed between such organizations as they learned from each other about their individual and collective experiences in relation to CS/CH matters to determine the best way forward to address these issues. The data analysis revealed high levels of involvement and deep interactions among actors evidenced by the formation of several working groups (or) committees on TCP code. Embeddedness is the degree to which a collaboration is enmeshed in interorganizational relationships (Dacin, Ventresca & Beal, 1999). Representation arrangements discussed in earlier sections are indicative of high level of embedded collaborations. For further confirmation of emerging field development, the study findings were compared with another issue based Emerging Fields study undertaken by Maguire, Hardy & Lawrence (2004) (refer to **Table 7**).

## DEVELOPMENT OF EMERGING FIELDS

Several authors have studied Emerging Fields in the past (Lawrence et al., 2002; Maguire et al.,2004; Scott, Mendel & Pollack, 2000; Anand & Watson, 2004; Grafstrom, 2006). A relevant study by Hoffman (1999) on environmental policies in U.S chemical industry showed that several phases occurred during the development of a field from 'emerging' to 'mature' stages. Hoffman's longitudinal analysis (1960-1993) studied the changes to the constituency of Organization Field of corporate environmentalism in the US chemical industry. It took several decades for the structuration of the field. The field developed through various stages (Stage 1:1962-70, Stage 2:1971-82, Stage

3:1983-88 and Stage 4: 1989-93). Additionally, Hoffman (1999) and Fligstein (1997) highlighted the notion of 'Flux'in Emerging Fields. Fligstein (1997) states that '*field emergence in the formation stage is characterized by fluidity in which [t]he roles of challengers and incumbents are yet to be defined, and there is no accepted set of social relations*'. Hoffman (2001) states that the periods of flux often involve interests of diverse parties both inside and outside the organization and managers of such organizations are often concerned about social issues to assist with development of strong business strategies during periods of change, instability and uncertainty with varying stakeholder interests.

In the context of vLISP industry, the regulatory managers of vLISPs along with other stakeholders such as regulator, consumer association, ombudsman, industry association and government agency with multiple interests are currently experiencing periods of flux which can be attributed to the rapid technological growth and increase in Internet subscriber numbers. There are three key factors identified in this study that will play a major role in fuelling further field development. First, there is a role for 'power' of regulatory managers of vLISPS in fuelling the field development. Second, field development needs ongoing commitment from all institutional actors identified in the Emerging Fields. Third, the notion of legitimacy within the Emerging Fields is important for actors in vLISPs to maintain good relationship with field members, external stakeholders and engage with them to influence CS/CH practices (**Table 8** provides profile of organizations that central actors represent). It is acknowledged that ISP industry is not as mature as some of long existent industries such as manufacturing and museums. However, if the collaborative interactions are viewed in the long term, it has the capability to further develop the Emerging Fields identified in this study (DiMaggio et al.,1991).

Institutional researchers in the past have conducted longitudinal studies investigating the evolution, structuration and recomposition of Organization Fields (Greenwood, Suddaby & Hinings (2002) conducted historical survey of the case of accountants in Canada for the period 1977-1997; Charlene & Lawrence (2010) studied the role of institutional work in the transformation of an Organization Field; Lawrence et al. (2002) studied the institutional effects of inter-organizational collaboration leading to emergence of proto institutions; Lounsbury & Crumley (2007) studied financial

management practice in investment funds for period 1924-1995; Leblebici, Salancik, Gopay & King (1991) studied inter Organization Fields of US broadcasting industry; Lounsbury (2002) studied professionalization of the field of finance; Maguire et al. (2004) studied emerging field of HIV/AIDS treatment advocacy; DiMaggio et al. (1991) studied the Organization Field of professional project: US Art Museums between 1920-1940; Reay & Hinings (2005) studied recomposition of an Organization Field involving health care in Alberta). These studies signify the notion of studying Emerging Fields at various points in time. Studying Emerging Fields identified in this study over the next 5-10 years period is key to informing future CS/CH practices and to take an evidence-based approach towards developing CS/CH practices that deliver good consumer outcomes (Horsley & Gerrand, 2011).

## CONTRIBUTIONS, CONCLUSION AND FUTURE WORK

The study contributions are: 1) Identification of emerging organizational fields comprising of the central actors in the Australian vLISP industry. The Emerging Fields have the potential to develop into mature organisational fields and inform future CS/CH practices in Australian ISP industry. Such mature Organization Fields have the potential to exert 'powerful forces' on individual ISP organizations and the influence the 'structure and behaviour' of the organization (DiMaggio et al., 1991) 2) Very few studies in Australian context have examined the personal viewpoints of the central actors involved in developing CS/CH practices using institutional lens. This is important given that both institutional and organizational factors influence and motivate the adoption, implementation and decision making on CS/CH practices in vLISPs (Gunnigham & Rees, 1997; Truscott, 2007). The study's rich discussion and description of the emerging Organization Fields within ISP industry, their development, the relevant actors and their interactions and their influence on CS/CH practices has shed light on institutional influence on practices of technology-based service organizations. Studying the role of the key actors in influencing policy decisions of the government in these Emerging Fields in the long-term will provide valuable insights into the influence strategies used by the central actors to shape current and future broadband consumer protection policies in Australia.

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**Table 1:** Levels in Institutional analysis (Bjorck, 2004)

| Level | Research context |
|---|---|
| **World System** | - |
| **Societal** | Australia |
| **Organization Field** | Internet Service Provision |
| **Organization population** | Very Large Internet Service Providers |
| **Organization** | Top four very large ISPs in Australia |
| **Organization sub system** | Department of regulatory and corporate affairs in very large ISPs |

**Table 2:** Justification for focus on top four vLISPs in Australia

| Reasons for focus on top four vLISPs |
|---|
| They provide services to 80 per cent of residential Internet subscriber base |
| Their CS/CH performance has been subject of scrutiny in the media |
| Their 'visibility' in the marketplace meant their CS/CH practices are under increased scrutiny by external stakeholders |
| The regulatory managers of the four vLISPs are board members of various stakeholder organizations to develop/review/revise CS/CH practices |
| This study focussed only Internet service issues (not mobile or landline) for residential customers. |

**Table 3:** Systemics CS/CH issues (ACMA, 2011; TIO, 2011)

| | |
|---|---|
| **Systemic CS issues** | <ul><li>Huge waiting time, misleading claims, no follow-up action by providers.</li><li>Customer frustration in being shifted to various departments when they call their providers</li><li>Inability of ISPs to deal with huge influx of calls due to shortage of staff in call centres</li><li>Incorrect (or) inadequate information at point of sale</li><li>Customers lack of understanding of services they have purchased from their provider</li></ul> |
| **Systemic CH issues** | <ul><li>Failure to action undertakings</li><li>Failure to direct customer to the right area of business to resolve complaints</li><li>Failure to resolve complaints in a swift manner</li><li>Failure to recognize a complaint</li><li>Failure to inform customers about alternate dispute resolution avenues such as the TIO</li></ul> |

**Table 4:** Profile of participants

| Organization Type [O] | Participant's role in the organization [P] |
|---|---|
| Consumer Association **[O1]** | Senior executive officer of consumer association relevant for ISPs. Has decades of experience in the Internet industry **[P1]** |
| Industry Consultant **[O2]** | Principal of ISP industry consulting firm; has 30 years experience in the telco industry and has worked for major ISPs in regulatory affairs area in the past [**P2**] |
| ISP Industry Association **[O3]** | Senior executive officer of the industry association responsible for code development, engagement with industry members. Represents the views of industry members and is heavily involved in industry related policy activities **[P3]** |
| Telecommunications Industry Regulator **[O4]** | Senior executive in the regulatory agency assisting, facilitating development of codes, registration of codes, compliance monitoring/ enforcement of codes **[P4]** |
| Telecommunications Industry Ombudsman **[O5]** | A senior executive involved in planning and stakeholder management. Oversees four functional teams at the Ombudsman **[P5]** |
| Very Large ISP1 **[O6]** | General counsel executive who heads up the legal and also the regulatory functions of the ISP. Another team member who is involved in a number of regulatory tasks and responds to submissions or participates in code review or implementing compliance **[P6a, P6b- Two participants]** |
| Very Large ISP2 **[O7]** | Senior executive staff of consumer and compliance in the regulatory affairs team of a very large national ISP. Has been working for this Telco in excess of thirty years and has extensive experience in the Australian telecommunications industry regulatory space **[P7]** |
| Very Large ISP3 **[O8]** | Regulatory executive of a very large ISP based in Western Australia. Deals with the regulatory and compliance issues for this organization. Overall, has close to forty years experience in the telecommunications industry **[P8]** |
| Very Large ISP4 **[O9]** | Customer knowledge manager of a very large ISP based in Victoria. Has extensive experience in dealing with customer service issues **[P9]** |
| Australian Government Department for Broadband **[O10]** | Senior government executive from government department for broadband who manages the consumer engagement section, which is involved in a number of consumer policy issues **[P10]** |

**Table 5:** Key changes in the revised TCP code (Communications Alliance, 2011)

| |
|---|
| Tighter timeframes for acknowledging complaints and resolution (within two days and resolved within three weeks) |
| ISPs need to inform their customers of complaint outcomes |
| A new definition of 'Complaint' that requires ISPs where uncertain, to ask if their customers wish to make a complaint |
| All ISPs need to implement the CH processes stated in the revised TCP code |
| ISPs need to provide customers unique complaint reference number that allows them to track a complaint |
| Independent compliance committee- Communications Compliance (CC) that will monitor the compliance activities. This includes monitoring individual ISPs on the CS metrics and benchmarking standards developed by this committee |
| Mandatory submission of code compliance statements |
| Statement of independent assessment to Communications Compliance (CC) |
| Compliance report in a format required by CC against list of CS metrics |
| Comply with directions from CC consistent with code obligations |
| Provision of more and clearer information about products before point of sale- 'Summary of Offer' document |
| The enforcement actions against ISPs who are not complying with the new code include the regulator directing the ISP to comply with code, if a direction is breached, the regulator can issue an infringement notice, seek civil penalties up to 250,000 in the Federal court or accept enforceable undertakings. |

**Table 6:** Sample interview quotes

| Section | Sample Interview Quote |
|---|---|
| TCP code **[Q1]** | *I think the other issue that's important in this current code review is that the industry has acknowledged that its own internal code compliance arrangements were deficient. The industry wasn't really monitoring and reporting and asserting compliance against its own codes of practice. This current code - the industry has committed to set up its own monitoring body called Communications Compliance.* **[P7]** |
| Penalties and Code enforcement mechanisms **[Q2]** | *....I think one of the big criticisms of the original code as you say is not many signatories but, also, what was the compliance mechanisms? If people were going to breach the Code well what was the penalty?* [P9]  *Well again, I think you've got a culture there that says we will do what we can get away with and if there's no penalties for bad behaviour we'll behave badly.*[**P9**] |
| Disparate institutional actors came together **[Q3]** | *Because I think that everyone would rather the opportunity to be the master of their own destiny rather than have it, you know, you'd rather do something than have it done to you. That's what the whole impetus behind self or co-regulation is, it's make rules that work for yourself, but then if they don't work you know somebody else that's going to come and make them for you.* **[P4]** |
| Trigger events **[Q4]** | *I think there has been just simply the public and media outcry over the rising complaints that industry really are on the nose and they need to do something about it, so that's been a pressure I think the <regulator> inquiry has been appreciating. I think also having <consumer association>on the actual steering committee has been another pressure because <consumer association>have been quite forceful in trying to push for various things* |

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| | |
|---|---|
| | *and there's been a number of heated meetings. You only have to read <industry association> submission to the <consumer association> review to see that, where they've complained in fact that they thought that <consumer association> were perhaps too pushy ... in the way in which they carried out their role there. So I think there's been a number of things there that have put a lot of pressure on industry to do better, yes, that's for sure* **[P9]** |
| Collaboration on CS/CH practices **[Q5]** | *Yes. With the <ombudsman>, the <regulator>, <the Department>, we meet formally once a quarter, but informally we talk all the time. With <industry association>, again we're part of working groups with them so there's an ongoing relationship there. <consumer association> are a member of our consumer consultative forum so we meet with them formally as part of that but also have ongoing informal discussion about any issue.* **[P4]** <br><br> *Our Board meets every two months and there is discussion at that level about these issues. The working groups have met more than 100 times. The industry group that I run to craft positions, is meeting at the moment on a weekly basis, sometimes more than once a week as we get to the pointy end of the revision process. So it's been - since the code revision started in May 2010, those meetings have been regular over the last six months they've probably increased in frequency.* **[P3]** |
| Collaboration to achieve a favourable outcome **[Q6]** | *Well look we do actually, there's a lot of common ground and common issues across the industry and that includes <vLISP2> as well. Most of the times. So we do meet frequently on more of an informal basis. Yeah, look we do, across a number of issues. It's useful from our perspective because a lot of those other telcos are much better resourced. So we can benefit from a lot of the work they can do on some of these issues. But it also - we acknowledge and recognise that in numbers we have a better chance of getting a more favourable outcome on some of these issues.* **[P6]** |
| Representation **[Q7]** | *...This current code - the industry has committed to set up its own monitoring body called Communications Compliance. That body will be empowered to seek reports from all of the industry members about their compliance with that particular code. It will have powers to ask questions and investigate if necessary. Where a participant hasn't responded to those requests, then they'll be submitted off to the regulator to take necessary action. So we think that combined with raising the rules of the roads, as I said before and making a higher threshold, together with improved compliance framework, it will, one hopes, drive the right behaviour in the industry to deliver better compliant outcome both in complaint handling and customer service.* **[P7]** |
| Information exchange **[Q8]** | *But more broadly we've also got this information and intelligence role whereby we actually supply providers on a monthly basis with detailed complaints data pertaining to their particular company complaints through our scheme, and really some of the complaint issues and areas of growth and trends that are coming out of those. We actually try and provide a great deal of data to the industry members, back to them, to assist in their own root cause analysis of what might be driving these complaints.* **[P5]** |

**Table 7:** Comparison between Maguire et al. (2004) study and this study

| Elements of the field | Year 1995 HIV/AIDS treatment advocacy | Year 2000 HIV/AIDS treatment advocacy | Year 2008 ISP Field (Old TCP code registered in 2008) | Year 2012 ISP Field (New TCP Code registered in 2012) |
|---|---|---|---|---|
| **Interaction among fields members on issues** | Adhoc meeting between community and pharmaceutical companies on treatment issues | Regular ongoing meetings with dedicated CTAC (Canadian Treatment Advocate Council)representatives, annual meeting and seminars | The CS/CH issues drew attention of many stakeholders such as Ombudsman, Regulator and the Consumer association. There was not much engagement among these stakeholders to address these issues | Frequent interactions using both formal and informal communication channels on CS/CH issues and engagement on various sections of the TCP code between 2010-11 |
| **Arena for discussions on issues** | Canadian AIDS Society, Therapies committee | CTAC | The discussions was not an industry wide discussion, instead it was more of an adhoc discussion among stakeholders in their board meetings and forums | Industry wide discussion, in conferences TCP code steering/working committees, inquiry, campaigns and board meetings |
| **Advocacy skills** | Adhoc and minimal | Has explicit mandate to train new treatment advocates | The consumer advocates were more vocal about the CS/CH issues and ISPs were failing to meet customer expectations. However they felt that the regulator was not able to address their concerns as there was a lack of clear enforcement mechanism and penalties attached to the old TCP code | A dedicated peak consumer body ACCAN advocating on behalf of the consumers funded by the Australian Government. Has had active engagement with all stakeholders over the last few years and organizes annual conference that brings all major players and other stakeholders together to discuss consumer issues in the ISP Industry |

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| | | | | |
|---|---|---|---|---|
| **Point of contact for government in understanding issues** | Canadian AIDS Society | CTAC, Canadian AIDS Society | The Minister's department established ACCAN in late 2008 funded by the Australian government. In addition they have communication with regulator, ombudsman and the industry association on consumer issues | Regular contact with all industry stakeholders in conferences, special forums/workshops and engagement with independent compliance committee |
| **Pattern of consultation and information exchange on issues** | Decentralized and Adhoc | Regularized | There was no collective engagement among various stakeholders and it was more adhoc | Collective engagement on code matters occurred over the last few years and is expected to continue due to specific measures in the new TCP code that has clear mechanism on industry wide engagement to address current/emerging consumer issues and demonstrate compliance with the revised TCP code |
| **Prominent actors involved in discussion of issues** | Canadian AIDS Society Committee members, individuals associated with AIDS service, and people with AIDS (PWA) organizations | CTAC members, community actors on treatment issues, PWA organizations | Regulator, consumer association and the ombudsman | All institutional actors identified in this study. There is an ongoing commitment of these actors to engage among themselves due to additional obligations included in the code compliance process of the revised TCP code to address gaps in the code |
| **Representation of community organizations** | Representation roles were not clear. Canadian AIDS committee had no clear/systematic representation of other organizations | CTAC members had representatives from all provinces, PWA organizations and related members | ACCAN was established and its role was clear which was to make sure there were enough consumer safeguards to protect vulnerable consumers and make sure consumer issues are dealt with appropriately by the industry | ACCAN has consumer advocacy councils, undertakes research into consumer issues in the industry and is expected to play a role in the new compliance committee in overseeing industry compliance |
| **Mandate to provide advice on issues** | There was no formal mandate to provide advice on treatment issues to the industry | CTAC has mandated to consult and exchange information on treatment issues with pharmaceutical companies | There was no clear mechanism on code monitoring, enforcement to deal with CS/CH issues. There was no specific requirement for ISPs to submit compliance statement, disclose information about strategies they used to address systemic CS/CH issues. (Old TCP Code) | The Communications Compliance is an independent body responsible for monitoring code compliance. The committee reviews compliance reports submitted by ISPs against standard list of CS/CH metrics developed by them. The committee is expected to play a key role in engaging all key stakeholders such as ISPs, regulator, industry association, government agencies, consumer association and Ombudsman to review gaps in the code and have industry wide input to deal with such gaps |

**Table 8:** Profile of organizations interviewed in this study

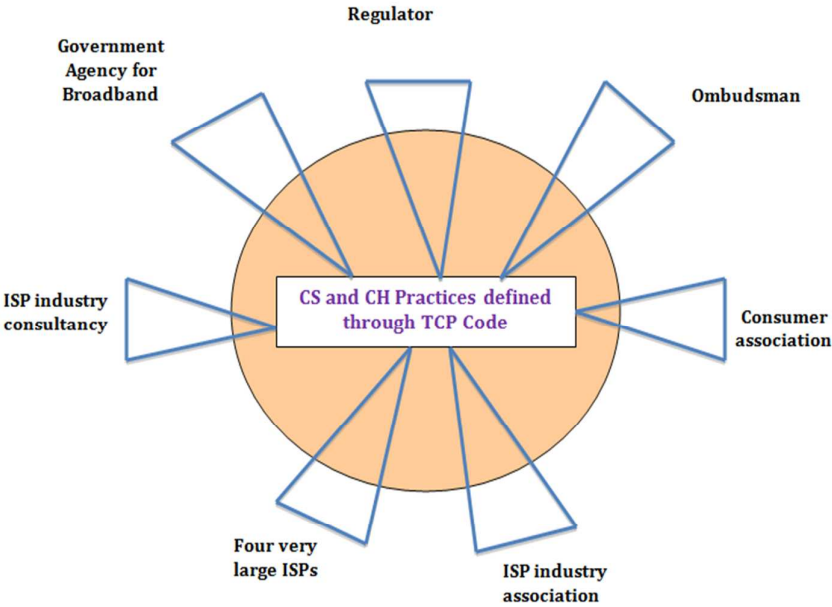| |
|---|
| **TELECOMMUNICATION INDUSTRY CONSUMER ASSOCIATION [O1]** |
| It is the peak consumer organization that represents consumers in the communications policy arena and to work towards getting affordable, available and accessible communications for all Australians wherever they're working or living. They focus more on residential consumers but they also represent small business insofar as they're treated like consumers. |
| **TELECOMMUNICATION INDUSTRY CONSULTANCY [O2]** |
| Provides regulatory management services to the ISP Industry. Provided assistance to regulator by contributing to their commissioned report on RTC – Reconnecting the Customer inquiry. Has assisted consumer organization and <very large ISP 2> in their research. Helped industry association in TCP compliance training program. Covered a whole breath of industry on all sides in TCP code development. |
| **INDUSTRY ASSOCIATION [O3]** |
| The objectives of the organisation fall into a number of categories. Firstly they have responsibility to undertake the self-incurred regulatory functions prescribed in the *Telecommunications Act 1997*. That involves creating, revising, maintaining the various codes, standards and guidelines under which the sector operates. These are both technical and consumer related documents. Secondly they provide a collaborative environment in which ISPs can work together on common issues of industry interest and formulate, create sensible solutions to regulatory and/or technical problems or challenges. Thirdly, they are heavily involved in the creation of the national broadband network (NBN). They have operated eight working groups comprising more than 200 expert individuals from the industry who together have created much of the original planning and design work for the NBN. They provided free consultancy to <NBN company> because the industry is interested in making sure this network operates not just as a successful access infrastructure, but also as a service delivery system. They are also involved in advocacy on behalf of the industry, both in the public arena and in the political sphere. They do a lot of work on policy development and on representing the industry's views in response to government inquiries, consultation papers and legislative processes. |
| **TELECOMMUNICATION INDUSTRY REGULATOR [O4]** |
| The organization is the key regulator and is a broad organization and they have a role in broadcasting, radio communication and telecommunications. In telecommunications, there is licensing for carriers, large carriers. They play a key role in areas of co-regulation which has to do with TCP code and code compliance. They are responsible for TCP code enforcement and monitoring. |
| **TELECOMMUNICATIONS INDUSTRY OMBUDSMAN [O5]** |
| The organization is as an independent dispute resolution scheme. It's focus is to be a consumer protection mechanism. Where consumers are not able to resolve their complaints directly with their service provider, they have the right to approach this organization really as an independent umpire for advice and assessment of their complaint. |
| **VERY LARGE ISP 1 [O6]** |
| This very large national ISP arrived on the scene when the industry was first de-regulated and open to competition. It was one of the first to get a licence to compete with top two very large ISPs who also had an earlier entry into the market through sponsored regulatory regime. Initially they were resellers of primarily a national very large ISP services, then also long distance telephony using the network where they would re-route the <very large ISP2> voice services onto their own network and turn it on again at the <very large ISP2> network at the other end. They developed their own network, broadband network over early 2000 and installed equipment in exchanges and were able to provide their own broadband services as well as voice services. They are an American owned company and a part of a global group with operations formerly in Europe, South America, Canada and the US. They are a full service provider in Australia. |
| **VERY LARGE ISP 2 [O7]** |
| They are a national ISP and also a large carrier. That reflects the history and involvement in the industry for many, many years. This ISP is a full service provider in the Australian market. It provides a full range of services to consumers - both fixed, wireless and value-added services. Through their history and status as the universal service provider, they are required to deliver all of those services to every consumer in Australia. So they have not only a full suite of services but also a full geographical delivery of those services. They have a presence in every geographical area in Australia, which is another important distinction between other suppliers who, in a competitive market, are able to choose where they physically supply services. |
| **VERY LARGE ISP 3 [O8]** |
| This is a national company based in Western Australia providing services to mobile voice, mobile broadband, fixed voice and fixed broadband. They commenced operations in 1993. It was a private organisation to start with but listed around about 2000. The growth of the company's came from two sources: they've been a very aggressive consolidator of other ISPs. They rolled out their own infrastructure in such a way to provide much higher speeds or higher bandwidths to customers than say, the likes of other very large ISPs and introduced things like Naked DSL and Voice Over Internet Protocol. They have received numerous customer service excellence awards and have a reputation for customer service in the industry. |
| **VERY LARGE ISP 4 [O9]** |
| This very large national ISP commenced operations in 1992. It has its own fixed, mobile and satellite networks. The ISP provides a range of communications services including mobile, national and long distance services, Internet services, telephony services and Internet television. |
| **GOVERNMENT DEPARTMENT FOR BROADBAND [O10]** |
| This is the government agency responsible for and it's a communications portfolio that's responsible for a wide range of things. It's responsible for the *Telecommunications Act* 1997 which primarily regulates ISPs and carriage service providers. It also regulates content and broadcasting. Further, it regulates the way in which various industry practices and standards occur. They have a renewed focus in looking at digital economy issues and committed to building the NBN. They are primarily a policy department who set the policy directions and rely on the regulators and the co-regulatory arrangements with the industry to regulate the day to day operations of ISPs. |

**Institutional actors of Emerging Field 1**



**Figure 1:** Emerging Organization Field 1 in the Australian vLISP industry (Adapted from Hoffman, 2001)

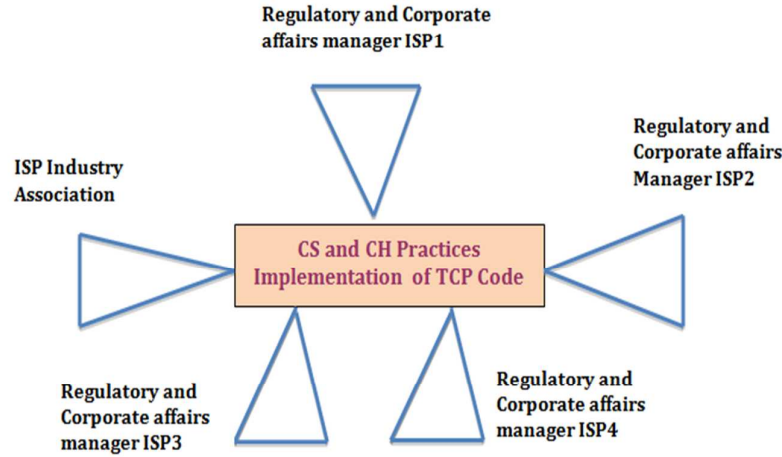**Institutional actors of Emerging Field 2**



**Figure 2:** Emerging Organization Field 2 in the Australian vLISP industry (Adapted from Hoffman, 2001)

**How and Why Technology Based Service Organizations Act Together:**
**Emerging Organization Fields in the Australian Internet Service Provider (ISP)**
**Industry**

## STUDY BACKGROUND

Customer Service (CS) and Complaints Handling (CH) performance of the Australian Internet Service Providers (ISPs) industry generated heated debate amongst ISP industry stakeholders during 2008-2011 following serious concerns expressed by telecommunications regulator, ombudsman and Internet consumers about failure of ISPs to live upto customer expectations (ACMA, 2011). CS is the '*provision of service to customers before, during and after a purchase*' (ACCAN, 2011). CH is '*an expression of dissatisfaction related to an organization's products, services or the complaints handling process itself*' (ACMA, 2011). CS/CH concerns forced the industry stakeholders to frequently interact with each other. Institutional theory of organization field provides an opportunity to study such issue-based coming together of stakeholders. Several definitions of organization field exists (Wooten & Hoffman, 2008; DiMaggio & Powell, 1983; Barley, 2010). Scott (2001) states that organization field is '*a collection of varying types of organizations, their suppliers, customers, and regulators that are formed around a common issue*'. This definition is used in this paper.

Hoffmann (1999) highlighted that '*field should be thought of as the center of common channels of dialog and discussion [...] which bring together various field constituents with disparate purposes*'. The focus is on the debate the relevant actors engage in and similar interests they share to acheive specific goals. Field emerges as a result of the negotiation through dialog on the central issue. The structure becomes organized as the interactions among various organizations develop and they are recognized as participants in the same debate. The field is formed by organizations intensively involved in the debate and concerned with the production and reproduction of specific set of practices related to the focal issue. These practices then become a part of the institutional arrangement (Scott, 2001; DiMaggio & Powell, 1983). Zietsma & Winn (2005) state that such an issue-based coming together is more suitable for analysis of emerging organization fields (dynamic in nature and

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experiencing flux which applies to ISP industry). **Table 1** shows the field level analysis relevant to this study. This paper uses Institutional theory of organization field to study and examine the recent collaboration developments in the Australian ISP industry.

First, the stakeholders in the Australian ISP industry are discussed. Then, a justification for the focus on CS and CH practices and on very large ISPs (vLISPs) is provided. The 'Trigger Events' that contributed to the intensification of CS/CH debate is summarised. Research design and methodology used is described. Major research findings and the factors that influence CS/CH in vLISPs are analysed. Then, the argument that there are emerging organization fields in the Australian vLISP industry which are in their embryonic stages of development is made.

## AUSTRALIAN ISP INDUSTRY STAKEHOLDERS

The key stakeholders that develop CS/CH practices of the ISP industry are: 1) **Industry association:** Communications Alliance (CA) 2) **Regulator**: Australian Communications and Media Authority (ACMA) 3) **Consumer association:** Australian Communications Consumer Action Network (ACCAN) 4) **Top four very large ISPs** interviewed in this study 5) **Government department for broadband**: Department of Broadband, Communications and the Digital Economy (DBCDE) and 6) **Telecommunications Industry Ombudsman** (TIO).

## CS/CH PRACTICES AND TCP CODE

The CS/CH practices of the Australian ISP industry are defined in the **Telecommunications Consumer Protection** (TCP) Code, a co-regulatory code developed by *Communications Alliance* in consultation with other key stakeholders. Von der Heidt & Charles (2009) define co-regulation as '*a system in which some of the responsibilities for regulatory development, implementation and/or enforcement are shared between industry groupings and governments*'. TCP code covers information on pricing, terms and conditions, billing, customer transfer, CS, credit management, contracts and CH. Once the code is developed, it is registered with the regulator and comes into effect. The *old TCP code* (TCP code 2007) was superseded by the *revised TCP code* (TCP code 2012) which came into effect on 1st of September 2012. Vigorous collaborations occurred amongst the stakeholders in 2010/11 during code review to address CS and CH deficiencies in the old TCP code.

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## JUSTIFICATION FOR FOCUS ON TOP FOUR VERY LARGE ISPs

This study focused only on the *top four vLISPs* in Australia because: 1) they collectively have close to 80 per cent of residential Internet subscriber base 2) their CS/CH performance has been subject of scrutiny in the media 3) their 'visibility' in the marketplace meant their CS/CH practices are under increased scrutiny by external stakeholders and 4) the regulatory managers of the four vLISPs are board members of various stakeholder organizations to develop/review/revise CS/CH practices. This study focussed only Internet service issues (not mobile or landline) for residential customers.

## 'TRIGGER EVENTS' THAT INTENSIFIED REACTION TO SYSTEMIC CS/CH ISSUES

Several events unfolded during 2008-2010 which are the '*Trigger Events'* that boosted the seriousness of CS/CH issues. A steady increase in CS/CH complaints recorded by the TIO (accounting for the proportion of complaints against the number of subscribers), ministerial intervention (press releases directed towards industry to uplift CS/CH performance) and consumer research reports that highlighted the inability of the existing regulatory arrangements to deal with systemic CS/CH issues (refer **Table** 2). The regulator's authority to enforce the old TCP code was limited as the code did not have clear compliance/enforcements mechanisms. This led to many vLISPs adopting the code as they saw fit, which led to superficial conformance (discrepancy between formal and actual CS/CH processes implemented within vLISPs). As a result ISPs regularly breached the code as there were no penalties associated with non-compliance. Such attitudes did not drive the right behaviour in the industry and resulted in poor service outcomes for Internet customers. The regulator launched an inquiry in 2010 known as RTC (Reconnecting the Customer) inquiry on CS/CH practices (18 months investigation) as a direct response to stakeholder concerns. The inquiry confirmed that the vLISPs failed to meet customer expectations on CS/CH. As a result the ISP industry was directed to address the deficiencies in the old TCP code based on the inquiry recommendations (ACMA RTC Inquiry Report, 2011).

## SUMMARY OF RESEARCH APPROACH

The main research question is *'What do the collaborative efforts of the institutional actors of the Australian very large ISP industry inform us about their collective role in influencing the CS/CH practices of the industry?*

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This study used exploratory qualitative research methodology to study the collaborative efforts that occurred in the ISP industry to improve TCP code and subsequent CS/CH practices. Eleven senior executives from key stakeholder organizations were interviewed between November 2011-October 2012 after obtaining university ethics approval. Thematic analysis was used for analysing data collected from interviews (Creswell, 2007). The benefit of thematic analysis lies in its flexibility of use (Braun & Clarke, 2006). It provided opportunities to understand and reveal collaborative relationships between key institutional actors, make sense and meaning of dynamics of relationships and how it influences the CS/CH practices of the ISP industry (Scott, 2001). Interview participants had experience between seven to forty years in dealing with CS, CH, regulatory compliance with TCP code and were the point of contact between their organization and external agencies. *Purposive sampling* was used as all participants were required to be in certain positions within the organization to provide the right perspective required for this study. Profile of the research participants is presented in **Table 3**. For privacy reasons, codes are used to identify participants and organizations they represent.

## MAJOR RESEARCH FINDINGS

### Research finding 1

The study revealed that there are **key agencies** (*regulator, ombudsman, industry association, consumer association and government department for broadband*) and **central actors** (*all actors interviewed in this study*) that operate in the institutional environment of Australian vLISPs who influence the development, review and revision of the industry's TCP code for CS and CH practices. Data analysis found that **Regulatory pressure** (*pressures exerted by regulator through enforcement actions/ directions to comply*) is the **dominant pressure** operating in the Australian vLISP industry. The regulatory managers from vLISPs responded to pressures because of increased regulatory activities over the last few years (regulator inquiry, consumer issue forums), pressures from multiple constituents to address CS/CH concerns and the real threat of tighter regulation. Their response to pressures was dependent on who exerted the pressure and under what circumstances those pressures were exerted (DiMaggio & Powell, 1983; Oliver, 1991). Please see [Q4] quote in **Table 5.**

An **issue-based coming together** of the institutional actors (in 2010 and 2011) occurred as a direct response to collective pressures placed on vLISPs by multiple constituents. This led to increased

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engagement, collaboration and negotiations between regulatory managers of vLISPs and relevant stakeholders to address deficiencies in the CS/CH arena. Detailed analysis of institutional pressures in the vLISP industry and vLISPs' response to pressures is discussed in a previous publication *<references suppressed>*. Frequent and fateful interactions amongst the institutional actors of the ISP industry led to significant improvements in the revised TCP code in areas such as code compliance/enforcement, CS, CH, billing, point of sale matters and establishment of independent body to oversee the industry's code compliance and CS/CH performance. **Table 4 lists code improvements.** The introduction of the revised TCP code and subsequent implementation has implications for consumer outcomes. The recent example of collaborative work by central actors during code review/revision in 2010/11 demonstrates the need for industry wide input to address CS/CH problems. This re-emphasises the notion of central actors acting as active agents in informing CS/CH practices of the vLISP industry. Therefore, ***CS/CH practices of the very Large ISP industry are institutionally derived practices.*** Detailed discussion in *<references suppressed>*.

**Research finding 2**

Key criteria for ***Organizational field*** (DiMaggio & Powell, 1991; Scott, 2001) are: 1) Pattern of interactions and collaborations among stakeholders 2) Representation (collaboration involving a new coalition in which collaborative organizations represented each other interests to outside parties) 3) Information flow exchange and the development of a mutual awareness that they are involved in a common debate and 4) Involvement and embeddedness**.** Application of these criteria to the study findings revealed that there are two emerging organizational fields comprising of regulatory managers of vLISPs and other central actors. The actors identified in these emerging fields actively influence the CS/CH practices (as stated in the revised TCP code) and the subsequent implementation of these practices. These practices translate to CS/CH performance when implemented within individual ISPs. When vLISPs are exposed to continuous exogenous shocks due to regulatory developments and technological growth there is a need for ongoing commitment by regulatory managers of vLISPs to express their collective interests on regulatory arrangements, maintain good relationship with external stakeholders and seek extrenal stakeholders' active support to influence CS/CH practices of the ISP industry. Importance of CS and CH will increase in the future following the introduction of NBN

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(National Broadband Network) where absence of monopoly over network infrastructure and increase in multitude of services provided over broadband platform (health, education, retail) necessitates ISPs to compete through service quality differentiation as opposed to infrastructure differentiation (NBN, 2013, ACCAN, 2011). Intensification of collaboration amongst these actors to handle CS/CH challenges will fuel further field development which will inform future CS/CH practices  and consumer protection policy arrangements for the ISP industry. This necessitates a longitudinal study of the field development from its emerging to mature state to understand the structuration of the field. Subsequent sections discuss *research finding 2* in detail.

### FACTORS INFLUENCING CS AND CH IN vLISPs

1) **TCP Code**: The ability of the TCP code to deal with CS/CH issues has implications for the CS/CH performance of the individual ISPs. This is illustrated by **[Q1]** participant quote in **Table 5.**

2) **Penalties and Code enforcement mechanisms** (regulatory compliance with the code): The success of any code depends on how efficient the compliance mechanisms and the checks are in enforcing the agreed to codes of practice. According to study participants, the *old TCP code* was inefficient in handling code compliance, enforcement or monitoring/penalties which contributed to poor outcomes for the customers. This is illustrated by **[Q2]** participant quote in **Table 5**.

3) **Complexity in products and services:** As the complexity in Internet products and services/ technologies increases, ISPs have to use more simple and clear pre-sales information to ensure customers have all the relevant information to choose the products/services that best suits their needs. When providers fail to deal with customer-oriented issues while selling their new products and technologies, their CS performance is affected because of the customer complaints that may arise from customers who are not fully aware of what they are purchasing and whether it best suits their needs.

4) *Competition politics:* ISPs who participated in this study believe that CS is key to winning the competition both to gain new customers and retain existing customers.

5) **Organization culture and attitude towards CS/CH practices***:* ISP management attitudes towards CS (cost or profit factor) in general plays a crucial role in influencing how the CS practices in the TCP code are implemented within individual ISPs. The challenge is that there are no direct financial

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benefits noticeable from CS investments. This can influence the ISP's response to CS/CH issues they face. Thus, organization culture towards CS has implications for their CS performance.

## DISCUSSION OF EMERGING ORGANIZATION FIELDS IN ISP INDUSTRY

### How and Why Central Institutional Actors of ISP industry Came Together?

DiMaggio & Powell (1991) showed that fields emerge when '*interacting actors begin to pay attention to problems of collective rationality'*. Signs of collective rationality among ISP organizations developed following the attention on the focal issue of poor industry-wide CS/CH performance. The vLISPs, regulator, government agency, ombudsman, industry association and the consumer association contributed to the debate on how to address the problems facing the industry. Because the industry reputation as a whole was at stake and the threat of tighter regulation was imminent, all the vLISPs were drawn together to form relational links that never existed before. Study participant response **[Q3]** in **Table 5** demonstrates the response of ISPs to avoid excessive regulation.

The central actors who influence the CS/CH practices in the industry include the regulatory managers of four vLISPs, regulator executive, consumer advocate, ombudsman executive, industry association executive and government department executive. These actors engaged in TCP code review activities, are represented in working committees on code review, board members of industry association, regulatory agency, ombudsman and attend frequent meetings in industry conferences/consumer forums to discuss CS/CH issues. The central actors are defined by *'position title'* in organizations they represent. All the actors interviewed in the study (example: Regulator managers in vLISPs) have extensive experience (varies between seven years to forty years) and interact with other ISP stakeholders as their position requires them to do so.

### Events that triggered processes that drive field evolution

Lampel & Meyer (2008) define Field Configuring Events (FCEs) as,

'*temporary social organizations such as tradeshows, professional gatherings, technology contests, and business ceremonies that encapsulate and shape the development of professions, technologies, markets and industries'*.

FCEs act as a platform to '*transform a disparate set of organizations and individuals into a*

'*community of organizations that partake of a common meaning system'* (Scott, 2001). In the ISP

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industry FCEs helped members get involved in defining CS/ CH practices and setting standards in relation to acceptable level of service in the TCP code. Meyer, Gaba & Cowell (2005) state that FCEs such as industry forums, working groups/committees provide unique social space for institutional actors. Such events help *'actors from diverse social organizations to assemble temporarily with the conscious, collective intent to construct an organization field'* (Meyer et al. 2005). Main FCEs in the ISP Industry were: TCP Code Review Steering Committee/Working Committee; ACCAN Annual Conferences 2009-2012; TIO Board Meetings/Workshops; Communication Alliance Board meetings and networking with vLISPs. These events provided social spaces for institutional actors to come together, explore central issues, build collective understanding and mobilise collective action on CS/CH issues (Garud, 2008; Lampel & Meyer, 2008).

### APPLICATION OF EMERGING FIELD CRITERIA TO THIS STUDY

There are two emerging fields in the Australian ISP industry. **Emerging field 1** comprising of actors from regulatory agency, government department, ombudsman, consumer association, ISP industry association and four vLISPs and **Emerging field 2** comprises of Industry association actor, regulatory and corporate affairs managers in four vLISPs. **Figure 1** shows the diagramatic representation of emerging field 1 and **Figure 2** highlights emerging field 2.  There is a link between the emerging fields, its actors and the factors influencing CS/CH performance of the industry because the actors of the emerging fields are actively involved in determining CS/CH practices, its implementation, monitoring and enforcement, reporting  and as a result agreeing to acceptable levels of CS/CH performance based on the TCP code. The field emergence criteria are now described.

**1) Pattern of interactions and collaboration among stakeholders**: Study participants provided insight into how frequently and with whom they interacted with to discuss CS/CH issues. During the TCP code review process in 2010/11, the number of interactions both formally and informally amongst the all industry stakeholders increased considerably. These interactions amongst actors were productive because of the thematic consistency focussed on CS/CH issues. Another reason why the collaboration and frequent interactions between the actors were initiated and occurred is because there was a joint benefit (avoiding excessive regulation)that might otherwise prove too difficult to achieve by individual actors. A sample quote is in [Q6] **Table 5**. Using Lawrence, Hardy & Phillips' (2002)

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definition for depth and scope of interactions, interactions within the ISP industry could be '*deep*' or '*shallow*'. Deep interactions occur when vLISPs interact with industry association, regulator and ombudsman to discuss CS issues/ TCP code. Shallow interactions occur when consumer association interacts with vLISPs to provide feedback on CS issues. **Table 6** highlights stakeholder interactions.

Collaboration is defined as '*cooperative interorganization relationships that is negotiated in an* '*ongoing communicative process and relies on neither market or hierarchical mechanisms of control*' (Lawrence et al. 2002; Phillips, Lawrence & Hardy, 2000). Lawrence et al. further refine this definition to suggest that collaboration is more than interorganizational relationships that are cooperative and state that cooperation could either be purchased (or) based on some form of legitimate authority (regulator). Such a definition is critical to understanding the stakeholder collaboration in ISP industry. Stakeholder collaboration comprised of elements based on both cooperation (between ISP industry association and vLISPs) and authority (regulator). All the industry players came together under the leadership of ISP industry association to address CS/CH problems through revisions to the TCP code and to determine acceptable CS/CH practices, strong enforcement and compliance mechanisms. A vLISP's submission to the code review issues paper highlights its genuine commitment to collaborate with other industry players to improve the industry CS reputation. It states,

'.. *[ISP name] has been a very active participant in Communications Alliance [CA] processes that pre-ceded the CA issues paper, particularly the first stakeholder meetings held on the 21 May 2010. ..We will continue to work as one of the two nominated industry participants on CA steering group charged with managing the TCP code review'. 'Customer service is fundamental to everything we do... We see customer service as a differentiator in a competitive market and industry arrangements should encourage providers to compete on the basis of service'*(Communications Alliance, 2011).

Additional quote is available in **[Q5] Table 5.**

**2) Representation (collaboration involving a new coalition in which collaborative organizations represented each other interests to outside parties):** The vLISPs and industry association collaborated on CS/CH issues to send a clear signal to the regulator not to further regulate the industry. They expressed salient stakeholder concerns on the inadequacy of the current compliance mechanisms by agreeing to the formation of an independent Communications Compliance (CC) committee in the revised TCP code that will oversee compliance mechanisms and be empowered to undertake compliance scrutiny. Hence, a representation taking the form of a collaboration involving a new

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coalition where all organizations represented each other's interest to other stakeholders unfolded in the Australian ISP sector. Please see [Q7] sample quote in **Table 5.**

**3) Information flow exchange and the development of a mutual awareness that they are involved in a common debate:** The study data revealed evidence of increases CS/CH related information exchange amongst ISP industry stakeholders. According to Lawrence et al. 2002 information flow amongst stakeholders can be unidirectional (occurs when one of the collaborating organization learned from the other), bidirectional (occurs when all collaborating partners learned from each other) (or) multidirectional (occurs when all collaborating organizations and the third parties learned from each other). Study data shows that while some conversations were bidirectional (for example communication between regulator and vLISPs) others were unidirectional (ombudsman providing CS/CH complaints data to vLISPs). Sample participant quote [Q8] is provided in **Table 5.**

**4) Involvement and embeddedness:** The institutional actors from various stakeholder organizations worked collaboratively to discuss and act upon CS/CH concerns. Information flowed between such organizations as they learned from each other about their individual and collective experiences in relation to CS/CH matters to determine the best way forward to address these issues. The data analysis revealed high levels of involvement and deep interactions among actors evidenced by the formation of several working groups (or) committees on TCP code. Embeddedness is the degree to which a collaboration is enmeshed in interorganizational relationships (Dacin, Ventresca & Beal, 1999). Representation arrangements discussed in earlier sections are indicative of high level of embedded collaborations. For further confirmation of emerging field development, the study findings were also compared with another study undertaken by Maguire, Hardy & Lawrence (2004) on issue-based coming together of emerging fields on HIV/AIDS treatment advocacy in Canada (refer to **Table 7**).

## DEVELOPMENT OF EMERGING FIELDS

Several authors have studied emerging fields in the past (Lawrence, Hardy & Phillips, 2002; Maguire, Hardy & Lawrence, 2004; Scott, Mendel & Pollack, 2000; Anand & Watson, 2004; Grafstrom, 2006). A relevant study by Hoffman (1999) on environmental policies in U.S chemical industry showed that several phases occurred during the development of a field from 'emerging' to 'mature' stages. Hoffman's longitudinal analysis (1960-1993) studied the changes to the constituency of organization

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field of corporate environmentalism in the US chemical industry. It took several decades for the structuration of the field. The field developed through various stages (Stage 1:1962-70, Stage 2:1971-82, Stage 3:1983-88 and Stage 4: 1989-93). Additionally, Hoffman (1999) and Fligstein (1997) highlighted the notion of 'Flux'in emerging fields. Fligstein (1997) states that '*field emergence in the formation stage is characterized by fluidity in which '[t]he roles of challengers and incumbents are yet to be defined, and there is no accepted set of social relations*'. Hoffman (2001) states that the periods of flux often involve interests of diverse parties both inside and outside the organization and managers of such organizations are often concerned about social issues to assist with development of strong business strategies during periods of change, instability and uncertainty with varying stakeholder interests.

In the context of ISP industry, the regulatory managers of vLISPs along with other stakeholders such as regulator, consumer association, ombudsman, industry association and government agency with multiple interests are currently experiencing periods of flux attributed to the rapid technological growth and increase in Internet subscriber numbers. There are three key factors identified in this study that will play a major role in fuelling further field development. First, there is a role for 'power' of regulatory managers of vLISPS in fuelling the field development. Second, field development needs ongoing commitment from all institutional actors identified in the emerging fields. Third, the notion of legitimacy within the emerging fields is important for actors in vLISPs to maintain good relationship with field members, external stakeholders and engage with them to influence CS/CH practices (**Table 8** provides information on profile of organizations that central actors represent). It is acknowledged that ISP industry is not as mature as some of long existent industries such as manufacturing and museums. However, if the collaborative interactions are viewed in the long term, it has the capability to further develop the emerging fields identified in this study (DiMaggio & Powell,1991).

Institutional researchers in the past have conducted longitudinal studies investigating the evolution, structuration and recomposition of organization fields (Greenwood, Suddaby & Hinings (2002) on historical survey of the case of accountants in Canada for the period 1977-1997; Charlene & Lawrence (2010) studied the role of institutional work in the transformation of an organization field; Lawrence,

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Hardy & Phillips (2002) studied the institutional effects of inter-organizational collaboration leading to emergence of proto institutions; Lounsbury & Crumley (2007) studied financial management practice in investment funds for period 1924-1995; Leblebici, Salancik, Gopay & King (1991) studied inter organization fields of US broadcasting industry; Lounsbury (2002) studied professionalization of the field of finance; Maguire et al. (2004) studied emerging field of HIV/AIDS treatment advocacy; DiMaggio & Powell (1991) studied the organization field of professional project: US Art Museums between 1920-1940; Reay & Hinings (2005) studied recomposition of an organization field involving health care in Alberta). These studies signify the notion of studying emerging fields at various points in time. Studying emerging fields identified in ths study over the next 5-10 years period is key to shaping and informing future CS/CH practices and to take an evidence-based approach towards developing CS/CH practices that deliver good consumer outcomes (Horsley & Gerrand, 2011).

### CONTRIBUTIONS, CONCLUSION AND FUTURE WORK

The study contributions are: 1) Identification of emerging organizational fields comprising of the central actors in the Australian vLISP industry. The emerging fields have the potential to develop into mature organisational fields and inform future CS/CH practices in Australian ISP industry. Such mature organization field exert 'powerful forces' on individual ISP organizations and the influence the 'structure and behaviour' of the organization (DiMaggio and Powell, 1991) 2) Very few studies in Australian context have examined the personal viewpoints of the central actors involved in developing CS/CH practices using institutional lens. This is important given that both institutional and organizational factors influence and motivate the adoption, implementation and decision making on CS/CH practices in vLISPs (Gunnigham & Rees, 1997; Truscott, 2007). The study's rich discussion and description of the emerging organization fields within ISP industry, their development, the relevant actors and their interactions and their influence on CS/CH practices has shed light on institutional influence on practices of technology-based service organizations. Studying the role of the key actors in influencing policy decisions of the government in these emerging fields in the long-term will provide valuable insights into the influence strategies used by the central actors to shape current and future broadband consumer protection policies in Australia.

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**Table 1:** Levels in Institutional analysis (Bjorck, 2004)

| Level | Research context |
|---|---|
| **World System** | - |
| **Societal** | Australia |
| **Organization field** | Internet Service Provision |
| **Organization population** | Very Large Internet Service Providers |
| **Organization** | Top four very large ISPs in Australia |
| **Organization sub system** | Department of regulatory and corporate affairs in very large ISPs |

**Table 2:** Systemics CS/CH issues

| | |
|---|---|
| **Systemic CS issues** | • Huge waiting time, misleading claims, no follow-up action by providers.<br>• Customer frustration in being shifted to various departments when they call their providers<br>• Inability of ISPs to deal with huge influx of calls due to shortage of staff in call centres<br>• Incorrect (or) inadequate information at point of sale<br>• Customers lack of understanding of services they have purchased from their provider |
| **Systemic CH issues** | • Failure to action undertakings<br>• Failure to direct customer to the right area of business to resolve complaints<br>• Failure to resolve complaints in a swift manner<br>• Failure to recognize a complaint<br>• Failure to inform customers about alternate dispute resolution avenues such as the TIO |

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**Table 3:** Profile of participants

| Organization Type [O] | Participant's role in the organization [P] |
|---|---|
| Consumer Association **[O1]** | Senior executive officer of consumer association relevant for ISPs. Has decades of experience in the Internet industry **[P1]** |
| Industry Consultant **[O2]** | Principal of ISP industry consulting firm; has 30 years experience in the telco industry and has worked for major ISPs in regulatory affairs area in the past [**P2]** |
| ISP Industry Association **[O3]** | Senior executive officer of the industry association responsible for code development, engagement with industry members. Represents the views of industry members and is heavily involved in industry related policy activities **[P3]** |
| Telecommunications Industry Regulator **[O4]** | Senior executive in the regulatory agency assisting, facilitating development of codes, registration of codes, compliance monitoring/ enforcement of codes **[P4]** |
| Telecommunications Industry Ombudsman **[O5]** | A senior executive involved in planning and stakeholder management. Oversees four functional teams at the Ombudsman **[P5]** |
| Very Large ISP1 **[O6]** | General counsel executive who heads up the legal and also the regulatory functions of the ISP. Another team member who is involved in a number of regulatory tasks and responds to submissions or participates in code review or implementing compliance **[P6- Two participants]** |
| Very Large ISP2 **[O7]** | Senior executive staff of consumer and compliance in the regulatory affairs team of a very large national ISP. Has been working for this Telco in excess of thirty years and has extensive experience in the Australian telecommunications industry regulatory space **[P7]** |
| Very Large ISP3 **[O8]** | Regulatory executive of a very large ISP based in Western Australia. Deals with the regulatory and compliance issues for this organization. Overall, has close to forty years experience in the telecommunications industry **[P8]** |
| Very Large ISP4 **[O9]** | Customer knowledge manager of a very large ISP based in Victoria. Has extensive experience in dealing with customer service issues **[P9]** |
| Australian Government Department for Broadband **[O10]** | Senior government executive from government department for broadband who manages the consumer engagement section, which is involved in a number of consumer policy issues **[P10]** |

**Table 4:** Key changes in the revised TCP code

| |
|---|
| Tighter timeframes for acknowledging complaints and resolution (within two days and resolved within three weeks) |
| ISPs need to inform their customers of complaint outcomes |
| A new definition of 'Complaint' that requires ISPs where uncertain, to ask if their customers wish to make a complaint |
| All ISPs need to implement the CH processes stated in the revised TCP code |
| ISPs need to provide customers unique complaint reference number that allows them to track a complaint |
| Independent compliance committee- Communications Compliance (CC) that will monitor the compliance activities. This includes monitoring individual ISPs on the CS metrics and benchmarking standards developed by this committee |
| Mandatory submission of code compliance statements |
| Statement of independent assessment to Communications Compliance (CC) |
| Compliance report in a format required by CC against list of CS metrics |
| Comply with directions from CC consistent with code obligations |
| Provision of more and clearer information about products before point of sale- 'Summary of Offer' document |
| The enforcement actions against ISPs who are not complying with the new code include the regulator directing the ISP to comply with code, if a direction is breached, the regulator can issue an infringement notice, seek civil penalties up to 250,000 in the Federal court or accept enforceable undertakings. |

**Table 5:** Sample interview quotes

| Section | Sample Interview Quote |
|---|---|
| TCP code **[Q1]** | *I think the other issue that's important in this current code review is that the industry has acknowledged that its own internal code compliance arrangements were deficient. The industry wasn't really monitoring and reporting and asserting compliance against its own codes of practice. This current code - the industry has committed to set up its own monitoring body called Communications Compliance.* **[P7]** |
| Penalties and Code enforcement mechanisms **[Q2]** | *....I think one of the big criticisms of the original code as you say is not many signatories but, also, what was the compliance mechanisms? If people were going to breach the Code well what was the penalty?* [P9]<br><br>*Well again, I think you've got a culture there that says we will do what we can get away with and if there's no penalties for bad behaviour we'll behave badly.*[**P9]** |
| Disparate institutional actors came together **[Q3]** | *Because I think that everyone would rather the opportunity to be the master of their own destiny rather than have it, you know, you'd rather do something than have it done to you. That's what the whole impetus behind self or co-regulation is, it's make rules that work for yourself, but then if they don't work you know somebody else that's going to come and make them for you.* **[P4]** |
| Trigger events **[Q4]** | *I think there has been just simply the public and media outcry over the rising complaints that industry really are on the nose and they need to do something about it, so that's been a pressure I think the <regulator> inquiry has been appreciating. I think also having <consumer association>on the actual steering committee has been another pressure because <consumer association>have been quite forceful in trying to push for various things and there's been a number of heated meetings. You only have to read <industry association>* |

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| | |
|---|---|
| | *submission to the <consumer association> review to see that, where they've complained in fact that they thought that <consumer association> were perhaps too pushy ... in the way in which they carried out their role there. So I think there's been a number of things there that have put a lot of pressure on industry to do better, yes, that's for sure* **[P9]** |
| Collaboration on CS/CH practices **[Q5]** | *Yes. With the <ombudsman>, the <regulator>, <the Department>, we meet formally once a quarter, but informally we talk all the time. With <industry association>, again we're part of working groups with them so there's an ongoing relationship there. <consumer association> are a member of our consumer consultative forum so we meet with them formally as part of that but also have ongoing informal discussion about any issue.* **[P4]**<br><br>*Our Board meets every two months and there is discussion at that level about these issues. The working groups have met more than 100 times. The industry group that I run to craft positions, is meeting at the moment on a weekly basis, sometimes more than once a week as we get to the pointy end of the revision process. So it's been - since the code revision started in May 2010, those meetings have been regular over the last six months they've probably increased in frequency.* **[P3]** |
| Collaboration to achieve a favourable outcome **[Q6]** | *Well look we do actually, there's a lot of common ground and common issues across the industry and that includes <vLISP2> as well. Most of the times. So we do meet frequently on more of an informal basis. Yeah, look we do, across a number of issues. It's useful from our perspective because a lot of those other telcos are much better resourced. So we can benefit from a lot of the work they can do on some of these issues. But it also - we acknowledge and recognise that in numbers we have a better chance of getting a more favourable outcome on some of these issues.* **[P6]** |
| Representation **[Q7]** | *...This current code - the industry has committed to set up its own monitoring body called Communications Compliance. That body will be empowered to seek reports from all of the industry members about their compliance with that particular code. It will have powers to ask questions and investigate if necessary. Where a participant hasn't responded to those requests, then they'll be submitted off to the regulator to take necessary action. So we think that combined with raising the rules of the roads, as I said before and making a higher threshold, together with improved compliance framework, it will, one hopes, drive the right behaviour in the industry to deliver better compliant outcome both in complaint handling and customer service.* **[P7]** |
| Information exchange **[Q8]** | *But more broadly we've also got this information and intelligence role whereby we actually supply providers on a monthly basis with detailed complaints data pertaining to their particular company complaints through our scheme, and really some of the complaint issues and areas of growth and trends that are coming out of those. We actually try and provide a great deal of data to the industry members, back to them, to assist in their own root cause analysis of what might be driving these complaints.* **[P5]** |

**Table 6:** Frequency and depth of interactions amongst ISP industry stakeholders based on participants response

(where **F** means Frequent interactions atleast once a month (formal/informal) and **IF** means Infrequent intercactions on a needs basis (formal/informal). Formal includes face –to-face interactions in board meetings, committees, forums while informal includes videoconferencing, phone conversation and email convesation).

| | O1 | O2 | O3 | O4 | O5 | O6 | O7 | O8 | O9 |
|---|---|---|---|---|---|---|---|---|---|
| O1 | - | - | IF | F | F | IF | IF | IF | F |
| O2 | IF | - | F | IF | IF | IF | IF | IF | IF |
| O3 | IF | F | - | F | F | F | F | F | F |
| O4 | F | IF | F | - | F | F | F | F | F |
| O5 | F | IF | F | F | - | F | F | F | F |
| O6 | IF | IF | F | F | F | - | IF | IF | F |
| O7 | IF | IF | F | F | F | IF | - | IF | F |
| O8 | IF | IF | F | F | F | IF | IF | - | F |
| O9 | F | IF | F | F | IF | F | F | F | - |

**Table 7:** Comparison between Maguire et al. 2004 study and this study

| Elements of the field | Year 1995 HIV/AIDS treatment advocacy | Year 2000 HIV/AIDS treatment advocacy | Year 2008 ISP Field (Old TCP code registered in 2008) | Year 2012 ISP Field (New TCP Code registered in 2012) |
|---|---|---|---|---|
| **Interaction among fields members on issues** | Adhoc meeting between community and pharmaceutical companies on treatment issues | Regular ongoing meetings with dedicated CTAC (Canadian Treatment Advocate Council)representatives, annual meeting and seminars | The CS/CH issues drew attention of many stakeholders such as Ombudsman, Regulator and Consumer association. There was not much engagement among these stakeholders to address these issues | Frequent interactions using both formal and informal communication channels on CS/CH issues and engagement on various sections of the TCP code between 2010-11 |
| **Arena for discussions on issues** | Canadian AIDS Society, Therapies committee | CTAC | The discussions was not an industry wide discussion, instead it was more of an adhoc discussion among stakeholders in their board meetings and forums | Industry wide discussion, in conferences TCP code steering/working committees, inquiry, campaigns and board meetings |
| **Advocacy skills** | Adhoc and minimal | Has explicit mandate to train new treatment advocates | The consumer advocates were more vocal about the CS/CH issues and ISPs were failing to meet customer expectations. However they felt that the regulator was not able to address their concerns as there was a lack of clear enforcement mechanism and penalties attached to the old TCP code | A dedicated peak consumer body ACCAN advocating on behalf of the consumers funded by the Australian Government. Has had active engagement with all stakeholders over the last few years and organizes annual conference that brings all major players and other stakeholders together to discuss consumer issues in the ISP Industry |
| **Point of contact for government in understanding issues** | Canadian AIDS Society | CTAC, Canadian AIDS Society | The Minister's department established ACCAN in late 2008 funded by the Australian government. In addition they have communication with regulator, ombudsman and the industry association on consumer issues | Regular contact with all industry stakeholders in conferences, special forums/workshops and engagement with independent compliance committee |
| **Pattern of consultation and information exchange on issues** | Decentralized and Adhoc | Regularized | There was no collective engagement among various stakeholders and it was more adhoc | Collective engagement on code matters occurred over the last few years and is expected to continue due to specific measures in the new TCP code that has clear mechanism on industry wide engagement to address current/emerging consumer issues and demonstrate compliance with the revised TCP code |
| **Prominent actors involved in discussion of issues** | Canadian AIDS Society Committee members, individuals associated with AIDS service, and people with AIDS (PWA) organizations | CTAC members, community actors on treatment issues, PWA organizations | Regulator, consumer association and the ombudsman | All institutional actors identified in this study. There is an ongoing commitment of these actors to engage among themselves due to additional obligations included in the code compliance process of the revised TCP code to address gaps in the code |
| **Representation of community organizations** | Representation roles were not clear. Canadian AIDS committee had no clear/systematic representation of other organizations | CTAC members had representatives from all provinces, PWA organizations and related members | ACCAN was established and its role was clear which was to make sure there were enough consumer safeguards to protect vulnerable consumers and make sure consumer issues are dealt with appropriately by the industry | ACCAN has consumer advocacy councils, undertakes research into consumer issues in the industry and is expected to play a role in the new compliance committee in overseeing industry compliance |
| **Mandate to provide advice on issues** | There was no formal mandate to provide advice on treatment issues to the | CTAC has mandated to consult and exchange information on treatment issues with pharmaceutical | There was no clear mechanism on code monitoring, enforcement to deal with CS/CH issues. There was no specific | The Communications Compliance is an independent body responsible for monitoring code compliance. The committee reviews compliance reports submitted by ISPs against standard list of |

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| industry | companies | requirement for ISPs to submit compliance statement, disclose information about strategies they used to address systemic CS/CH issues. (Old TCP Code) | CS/CH metrics developed by them. The committee is expected to play a key role in engaging all key stakeholders such as ISPs, regulator, industry association, government agencies, consumer association and Ombudsman to review gaps in the code and have industry wide input to deal with such gaps |
|---|---|---|---|

**Table 8:** Profile of organizations interviewed in this study

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**TELECOMMUNICATION INDUSTRY CONSUMER ASSOCIATION [O1]**
It is the peak consumer organization that represents consumers in the communications policy arena and to work towards getting affordable, available and accessible communications for all Australians wherever they're working or living. They focus more on residential consumers but they also represent small business insofar as they're treated like consumers.

**TELECOMMUNICATION INDUSTRY CONSULTANCY [O2]**
Provides regulatory management services to the ISP Industry. Provided assistance to regulator by contributing to their commissioned report on RTC – Reconnecting the Customer inquiry. Has assisted consumer organization and <very large ISP 2> in their research. Helped industry association in TCP compliance training program. Covered a whole breath of industry on all sides in TCP code development.

**INDUSTRY ASSOCIATION [O3]**
The objectives of the organisation fall into a number of categories. Firstly they have responsibility to undertake the self-incurred regulatory functions prescribed in the *Telecommunications Act 1997*. That involves creating, revising, maintaining the various codes, standards and guidelines under which the sector operates. These are both technical and consumer related documents. Secondly they provide a collaborative environment in which ISPs can work together on common issues of industry interest and formulate, create sensible solutions to regulatory and/or technical problems or challenges. Thirdly, they are heavily involved in the creation of the national broadband network (NBN). They have operated eight working groups comprising more than 200 expert individuals from the industry who together have created much of the original planning and design work for the NBN. They provided free consultancy to <NBN company> because the industry is interested in making sure this network operates not just as a successful access infrastructure, but also as a service delivery system. They are also involved in advocacy on behalf of the industry, both in the public arena and in the political sphere. They do a lot of work on policy development and on representing the industry's views in response to government inquiries, consultation papers and legislative processes.

**TELECOMMUNICATION INDUSTRY REGULATOR [O4]**
The organization is the key regulator and is a broad organization and they have a role in broadcasting, radio communication and telecommunications. In telecommunications, there is licensing for carriers, large carriers. They play a key role in areas of co-regulation which has to do with TCP code and code compliance. They are responsible for TCP code enforcement and monitoring.

**TELECOMMUNICATIONS INDUSTRY OMBUDSMAN [O5]**
The organization is as an independent dispute resolution scheme. It's focus is to be a consumer protection mechanism. Where consumers are not able to resolve their complaints directly with their service provider, they have the right to approach this organization really as an independent umpire for advice and assessment of their complaint.

**VERY LARGE ISP 1 [O6]**
This very large national ISP arrived on the scene when the industry was first de-regulated and open to competition. It was one of the first to get a licence to compete with top two very large ISPs who also had an earlier entry into the market through sponsored regulatory regime. Initially they were resellers of primarily a national very large ISP services, then also long distance telephony using the network where they would re-route the <very large ISP2> voice services onto their own network and turn it on again at the <very large ISP2> network at the other end. They developed their own network, broadband network over early 2000 and installed equipment in exchanges and were able to provide their own broadband services as well as voice services. They are an American owned company and a part of a global group with operations formerly in Europe, South America, Canada and the US. They are a full service provider in Australia.

**VERY LARGE ISP 2 [O7]**
They are a national ISP and also a large carrier. That reflects the history and involvement in the industry for many, many years. This ISP is a full service provider in the Australian market. It provides a full range of services to consumers - both fixed, wireless and value-added services. Through their history and status as the universal service provider, they are required to deliver all of those services to every consumer in Australia. So they have not only a full suite of services but also a full geographical delivery of those services. They have a presence in every geographical area in Australia, which is another important distinction between other suppliers who, in a competitive market, are able to choose where they physically supply services.

**VERY LARGE ISP 3 [O8]**
This is a national company based in Western Australia providing services to mobile voice, mobile broadband, fixed voice and fixed broadband. They commenced operations in 1993. It was a private organisation to start with but listed around about 2000. The growth of the company's came from two sources: they've been a very aggressive consolidator of other ISPs. They rolled out their own infrastructure in such a way to provide much higher speeds or higher bandwidths to customers than say, the likes of other very large ISPs and introduced things like Naked DSL and Voice Over Internet Protocol. They have received numerous customer service excellence awards and have a reputation for customer service in the industry.

**VERY LARGE ISP 4 [O9]**
This very large national ISP commenced operations in 1992. It has its own fixed, mobile and satellite networks. The ISP provides a range of communications services including mobile, national and long distance services, Internet services, telephony services and Internet television.

**GOVERNMENT DEPARTMENT FOR BROADBAND [O10]**
This is the government agency responsible for and it's a communications portfolio that's responsible for a wide range of things. It's responsible for the *Telecommunications Act* 1997 which primarily regulates ISPs and carriage service providers. It also regulates content and broadcasting. Further, it regulates the way in which various industry practices and standards occur. They have a renewed focus in looking at digital economy issues and committed to building the NBN. They are primarily a policy department who set the policy directions and rely on the regulators and the co-regulatory arrangements with the industry to regulate the day to day operations of ISPs.
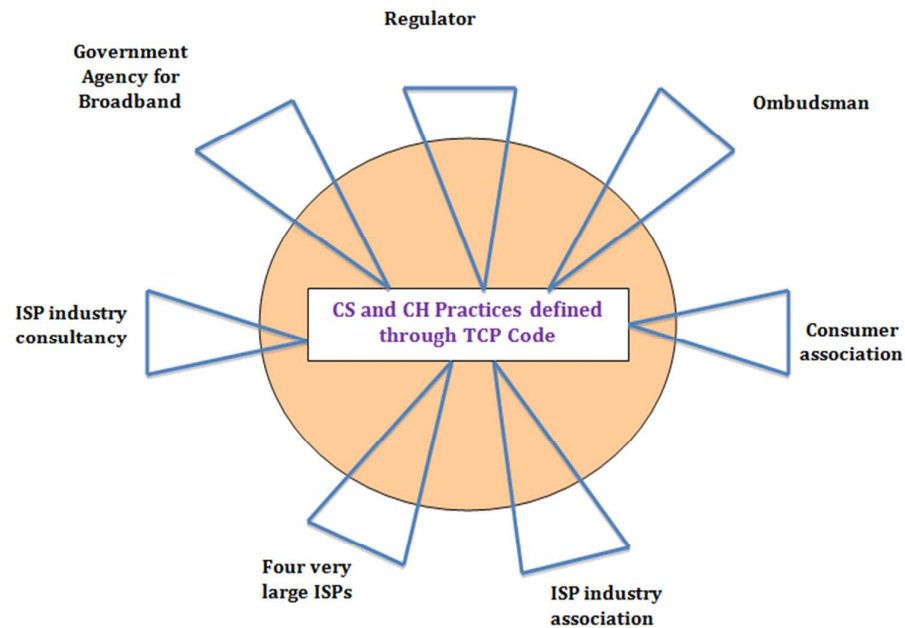
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**Institutional actors of Emerging Field 1**

Regulator

Government
Agency for
Broadband

Ombudsman

CS and CH Practices defined
through TCP Code

ISP industry
consultancy

Consumer
association

Four very
large ISPs

ISP industry
association

**Figure 1:** Emerging organization field 1 in the  Australian vLISP industry  (Adapted from Hoffman, 2001)

**Institutional actors of Emerging Field 2**

Regulatory and Corporate
affairs manager ISP1

Regulatory and
Corporate affairs
Manager ISP2

ISP Industry
Association

CS and CH Practices
Implementation  of TCP Code

Regulatory and
Corporate affairs
manager ISP3

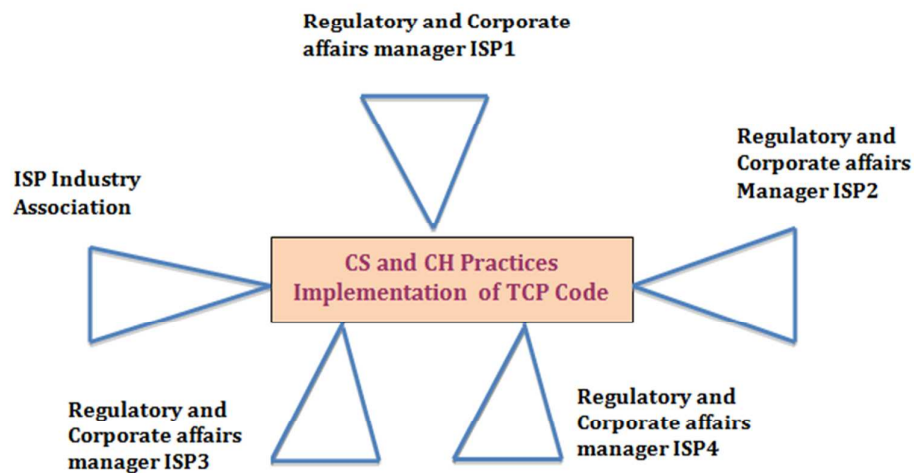Regulatory and
Corporate affairs
manager ISP4

**Figure 2:** Emerging organization field 2 in the  Australian vLISP industry  (Adapted from Hoffman, 2001)

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