

From:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent: Tuesday, March 19, 2024 9:56 AM

To: [REDACTED]

[REDACTED]

Cc: DL - [REDACTED]; [REDACTED]

[REDACTED]

Subject: RE: Proposed response to Southern Phone [SEC=OFFICIAL]

Thanks, all sounds good. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Consumer Division  
Australian Communications & Media Authority

**From:** [REDACTED]  
**Sent:** Tuesday, March 19, 2024 9:21 AM  
**To:** DL - [REDACTED]  
**Cc:** DL - [REDACTED]  
**Subject:** Proposed response to Southern Phone [SEC=OFFICIAL]

Hi [REDACTED]

As you will be aware, on Saturday, SPC confirmed its willingness to offer an EU.

When doing so, it set out in broad terms what the EU would cover (see email below). These include commitments we were looking for the EU to include, including an acknowledgement of the contraventions and appointing an independent auditor (to be approved by the ACMA) to review the systems and processes it has in place to comply with the Complaints Handling Standard.

We are satisfied that the proposed high-level outline of the EU is proportionate and if backed up by substantive provisions will reduce the risk of future contraventions. SPC's proposal is consistent with the ACMA's [Regulatory guide No 1\\_Enforceable undertakings.docx \(live.com\)](#) and modelled on recent EUs the ACMA has accepted from [REDACTED]. We directed SPC to our website and identified EUs that had similar commitments to commission audits.

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

Please let me know if you have any issues with our proposed approach.

Happy to discuss.

Regards

[REDACTED]

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**From:** [REDACTED]

**Sent:** Saturday, March 16, 2024 6:59 PM

**To:** [REDACTED]

[REDACTED] DL - [REDACTED]

[REDACTED] >; [REDACTED]

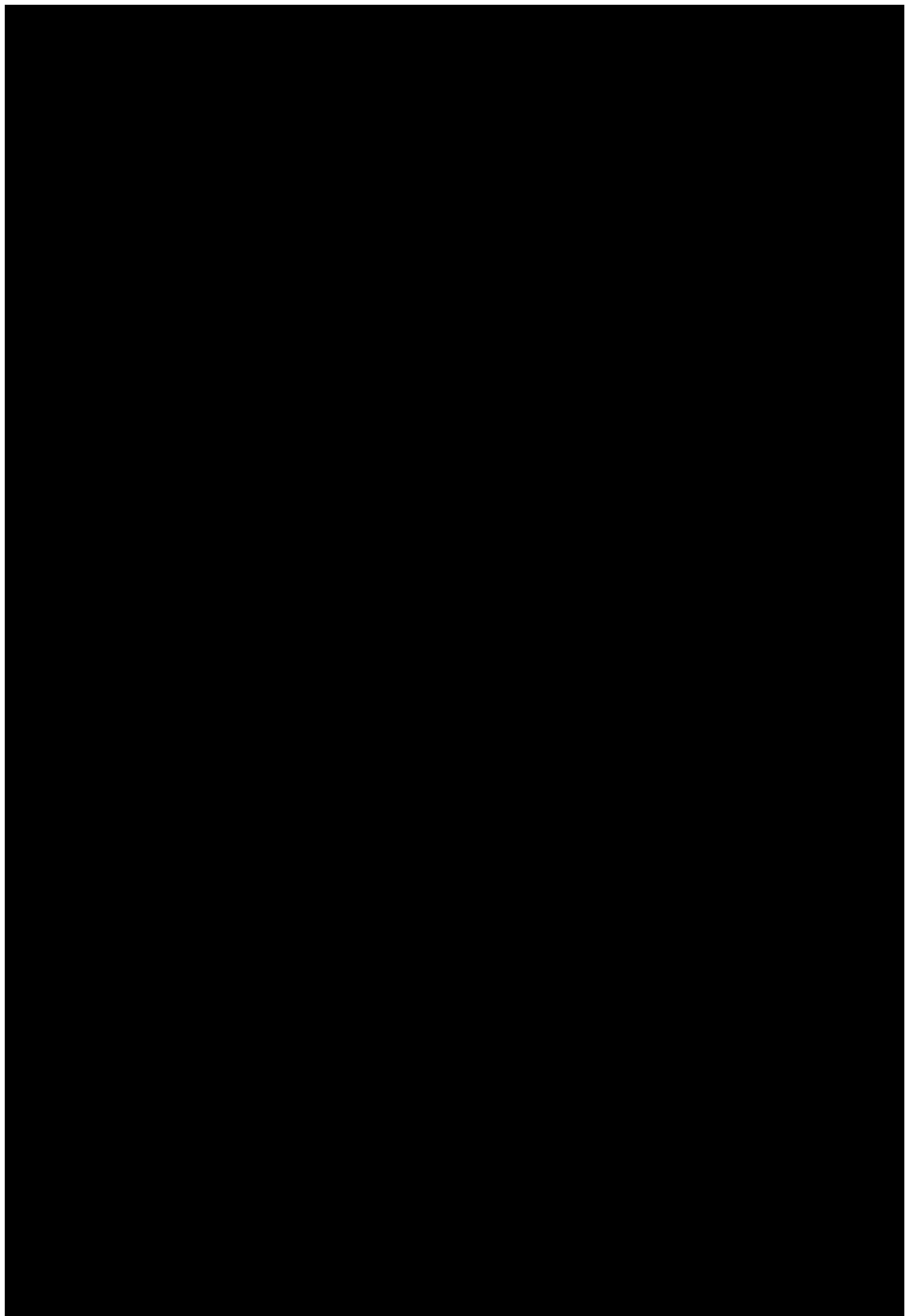
DL - [REDACTED]

[REDACTED]

[REDACTED]

**Subject:** RE: Scope of potential EU – Confidential [SEC=OFFICIAL]

[REDACTED]



[REDACTED]

[REDACTED]

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