

2 April 2025

By Electronic Submission

The Manager
Telecommunications Performance and Regulation Section
Australian Communications and Media Authority
PO Box Q500
Queen Victoria Building NSW 1230

RE: *Draft Telecommunications (Domestic, Family and Sexual Violence Consumer Protections) Industry Standard 2025*
Comments of Starlink Internet Services Pte. Ltd.

Starlink welcomes the opportunity to comment on the proposed *Telecommunications (Domestic, Family and Sexual Violence Consumer Protections) Industry Standard 2025 (DFS Standard)*, as published by the Australian Communications and Media Authority (ACMA).

Starlink has been providing non-geostationary, low-earth orbit satellite (**LEO-Sat**) internet services to residential, commercial and government customers in Australia since 2020. Today, Starlink's network has close to 100% coverage in Australia, and there are over 5 million customers on all seven continents using Starlink as a broadband connectivity solution for homes and offices, recreational vehicles, offshore and maritime vessels and private and commercial aircraft.

As a global provider of internet services to regions that until now have been unserved or underserved with high-speed broadband, Starlink is proud of our track record of serving consumers in these areas. Our simple plans (available here: <https://www.starlink.com/service-plans>) do not currently require a long-term contract, and service may be cancelled at any time by the customer. Starlink customers access internet services using satellite dish kits (known as the Starlink Kit) sold to customers and installed at the customer's premises where services will be provided. The Starlink network is routinely upgraded without any need for customers to change or upgrade their Starlink Kits.

Starlink's global footprint gives us a unique perspective on legal and regulatory requirements across the countries where we operate. Starlink recognises and supports measures undertaken by responsible operators, including Starlink, aimed at protecting and assisting vulnerable Australians, including those affected by circumstances of domestic, family or sexual violence. We and presumably other operators in Australia have a sensitivity and concern about customers who have been victims of any kind of violence, and we naturally want to assist them and ensure they can remain connected. Starlink's view, however, is that the draft DFS Standard:

- is overly prescriptive and difficult to understand, particularly in light of existing telecommunications consumer protections for individuals affected by hardship;
- approaches regulation with a focus on mobile services, which is not suitable when applied to emerging providers of fixed-satellite services like Starlink; and

- imposes what appears to be an indefinite obligation on operators to provide free service to anyone identifying as an ‘affected person’ without the ability to request evidence or to stop the free services after a reasonable period.

Starlink’s Submissions

1. *The DFSV Standard is unnecessarily prescriptive in light of existing consumer protections*

Starlink recognises that for those who are impacted by domestic, family or sexual violence — or indeed those impacted by other hardships — continued access to reliable and affordable telecommunications services is essential to supporting safety and wellbeing. Starlink also recognises that issues relating to domestic, family or sexual violence are often complex and require effective and supportive solutions.

On review of the draft DFSV Standard, it is not clear what actual protections or support measures the standard requires Starlink to provide that are not achieved by existing protections, including the protections and remedies required to be offered by service providers to individuals experiencing financial hardship under the *Telecommunications (Financial Hardship) Industry Standard 2024 (FH Standard)*. In addition, there are amendments currently under consultation to the Telecommunications Consumer Protections Code (**TCP Code**) seeking to expand protections and remedies available to ‘consumers in vulnerable circumstances’.¹

The FH Standard specifically emphasises the goal of assistance measures aimed at keeping customers facing hardship connected,² which is consistent with the requirement under the draft DFSV Standard that service providers support ‘affected persons’ and keep services connected.³ It is not clear what support Starlink can offer to affected individuals under the draft DFSV Standard that would not already be required by financial hardship assistance measures.⁴ Moreover, the DFSV Standard would add onto the highly prescriptive requirements of the FH Standard, Complaints Handling Standard and TCP Code several amorphous and burdensome rules requiring operators to do such non-descript things as ‘prioritise the safety of affected persons’ and have a policy that ‘set[s] out how the provider will support its personnel who deal with affected persons’ and is ‘trauma informed’.⁵ With requirements drafted in this way, operators can only speculate as to what they need to do to comply.

Accordingly, Starlink submits that the goals and objectives of the draft DFSV Standard are best met through existing regulatory standards and codes, and that there is no additional need to regulate such matters in an additional industry standard.

¹ Draft *Telecommunications Consumer Protections Code* DR C628:2025, section 1.2 (definition of ‘consumer in vulnerable circumstances’).

² See, e.g., FH Standard, section 9(c).

³ See, e.g., Draft DFSV Standard, sections 8(c), 12(2)-(3).

⁴ Indeed, the draft DFSV Standard at section 8(1)(d) currently states that a ‘DFV policy’ must recognise ‘domestic and family violence’ as a factor contributing to financial hardship assistance under the FH Standard.

⁵ Draft DFSV Standard, section 8(1), (2).

2. *The DFSV Standard approaches regulation from the viewpoint of traditional service technologies and delivery mechanisms, which are not suitable when applied to Starlink*

The proposed DFSV Standard refers to concepts that are not suitable or relevant in a globalised market for the supply of broadband services by LEO-Sats. By way of example, service providers must make available to an 'affected person' privacy and security measures related to not displaying particular call logs/records on any bill, record or other material issues in relation the service.⁶ Starlink, as a LEO-Sat internet service provider, does not provide mobile/landline call logs to customers, as this is not relevant to our services.⁷

Furthermore, given that Starlink operates a service model characterised by a very small number of plans for fixed services, it is not clear what 'support' (for the purposes of, for example, section 12 of the DFSV Standard) Starlink can realistically provide to an affected person, other than implementing payment plans or other financial assistance (which are already governed by the FH Standard) or otherwise directing those persons to specialist third parties.

3. *Ongoing obligation to maintain connection of an 'affected person'*

While ongoing and reliable connections to telecommunications services are essential for persons experiencing domestic, family or sexual violence, Starlink has concerns about the commercial impact on providers in the current drafting of the DFSV Standard, which seems to require that a service provider ensure any person who identifies as an 'affected person' remains connected for an indeterminate period.⁸ The draft DFSV standard also does not permit service providers to request evidence or supporting materials showing that someone is an 'affected person', unless the provider is under a legal obligation to obtain such evidence or supporting material.⁹ This is a confusing exception because it is not clear what, if any, 'legal obligation' a service provider might have that would require it to request evidence about domestic, family or sexual violence status.

While Starlink recognises the utility and protective purpose of this requirement, it lacks the balancing provisions contained in the FH Standard, under which evidence can be requested for longer term assistance measures or where the provider reasonably believes there is a possibility of fraud.¹⁰ There should also be a reasonable limit to the amount of time service has to be provided without payment.

Yours sincerely

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⁶ *Draft DFSV Standard*, section 16(1)(e), (6).

⁷ While it is possible for a customer to make internet calls or connect a voice-over-internet-protocol device using the Starlink service, any 'log' or record of such a call is not recorded by Starlink or ever presented to a customer in a bill.

⁸ See *Draft DFSV Standard*, section 12(3) (and also at section 8(c)(1) concerning the 'DFV policy' requirement).

⁹ *Draft DFSV Standard*, section 12(4)-(7).

¹⁰ *FH Standard*, section 16(3), (6).