



Telstra Response: Proposed Amendments to the Telecommunications (Consumer Complaints Handling) Industry Standard

Telstra Group Limited Consultation Response

Public submission

19 March 2025



Contents

1. Executive Summary.....	3
2. Introduction.....	5
3. We support the approach of giving customers a new way to raise complaints during network outages. However, the Proposed Amendments won't significantly improve customer outcomes and will only add to the regulatory burden.	6
4. We are committed to improving our customer service and are generally supportive of the Proposed Amendments to improve transparency, accessibility, and shortened resolution timeframes.	11
5. Consultation paper questions	13
6. Concluding comments	19
7. Marked Up CCH Standard	20
Refer to Draft Amendments - Telecommunications (Consumer Complaints Handling) Industry Standard 2018 – TELSTRA MARK UP	20



1. Executive Summary

Telstra welcomes the opportunity to respond to the Australian Communications and Media Authority's (ACMA's) consultation paper on its Proposed Amendments (Proposed Amendments) to the Telecommunications (Consumer Complaints Handling) Industry Standard (the CCH Standard). Our submission should be read in conjunction with Telstra's Response to the Proposed Amendments to the Telecommunications (Customer Communications for Outages) Industry Standard (CCO Standard)¹ as many of the issues and suggested changes depend on each other.

As part of our customer commitment, we strive to ensure that complaints are handled efficiently and resolved to the satisfaction of all our customers. We remain committed to continuous improvement and have recently begun transparently publishing our performance online, so our customers can track our improvements over time.²

During events that cause major disruptions to our network, our primary focus is to restore services as swiftly as possible. The root cause of an outage is typically technical in nature, often outside of Telstra's control (e.g. extended power grid outages) and will be worked on and restored by technical teams. In these circumstances, it is important to understand that lodging a complaint can't and won't expedite the restoration of service as we need to prioritise restoration efforts to address the root cause and broader customer impacts.

We recognise the importance of providing customers with the opportunity to report complaints during network outage events and as such, are committed to creating a direct way for customers to contact us in relation to specified network outages. However, we consider the benefit to customers of the Proposed Amendments relating to *network outage complaints* will be limited, particularly given that for most customers *default resolution* should resolve the issue. Unless changes are adopted to appropriately ring fence the occasions where a *network outage complaint* applies, customer service levels will suffer due to the increased operational complexity, regulatory burden and costs imposed on Carriers/CSPs in delivering these changes.

Based on the current drafting of the CCH Standard and the definition of *significant local outage* (SLO)³ proposed in the Customer Communications Standard (CCO Standard) we expect there will be significantly increased volumes of *network outage complaints* that our agents will be required to manage at any one time. As currently drafted, assuming that [c-i-c begins]

[c-i-c ends].

This is in addition to the usual number of complaints Telstra manages, typically in relation to billing, service difficulties or use and service policy. Our staff who manage complaints are highly skilled with specialist training, thus the flow on impacts to our business and our ability to respond to other non-outage related complaints would be severely diminished at these increased volumes. Ensuring a great customer experience for our customers is top priority for us, thus introducing new regulation which risks

¹ Telstra Group Limited Consultation Response, ACMA engagement- Proposed Amendments to the Telecommunications (Customer Communications for Outages) Industry Standard, March 2025

² [Complaints handling reporting - Telstra](#)

³ As explained in our submission on the Proposed Amendments to the CCO Standard (March 2025) either the geographic scope of the definition has to be reduced or the threshold (i.e., number of services affected for a specified period) increased. If inner regional and outer regional areas continue be included in the definition, then the threshold needs to be increased to 10,000 customers for > 6 hours.



this, must be avoided. It is also contrary to the intent of the Proposed Amendments, which are designed to improve outcomes for consumers.⁴

There will also be significant cost implications that must be borne by the CSP in establishing and maintaining these new processes. The precise costs are difficult to quantify as they are directly related to the volumes of complaints, but we estimate that this has the risk of adding incremental cost to our business in the [c-i-c begins] [c-i-c ends.] These are significant costs that relate to additional labour required to serve these complaints. This does not include the establishment costs in training our agents on the bespoke processes and requirements that are required to manage *network outage complaints*. We consider that these cost imposts are disproportionate to the limited benefit we expect customers will derive from the establishment of these new requirements.

We also consider that the following changes need to be made to make the CCH Standard workable and in line with the Minister's Determination:

- **Amend the definition of *network outage complaint*:** The definition of *network outage complaint* should be amended to require a customer to make an expression of dissatisfaction by the customer in relation to an identified network outage, analogous to the current definition of *complaint* under the CCH Standard.
- **Clarity about when a *network outage complaint* will apply:** A *network outage complaint* should only be able to be logged once a *network outage* has been determined by the CSP/Carrier. Enquiries before this time can only be treated as *service outage reports*.
- **Minimise contact and closure requirements:** Contact and closure requirements are onerous (particularly in cases where *default resolution* has been achieved) and, in many cases, will duplicate communications provided under the CCO Standard. These should be streamlined where possible.
- **Narrow the definition of *urgent network outage complaint*:** The requirements regarding prioritisation of complaints for consumers at risk (based on the broad definition of *urgent network outage complaint*, as currently drafted) should be limited to situations where health or safety are at risk.

With regard to other general improvements proposed by the ACMA to the CCH Standard, we are supportive of these changes. We consider that these improvements will assist in making it easier for customers to engage with their CSP regarding complaints through improved transparency, accessibility and other general improvements to complaint handling policies and procedures. In many instances, we already meet the requirements set out in the Proposed Amendments and consider that uniform adoption by all CSPs will lead to better outcomes for customers. A key aspect of the ACMA's improvements is a shortened timeframe to resolve complaints. We support the proposed shortening of timeframes to resolve complaints. We are continually improving our processes to ensure that all complaints are fully resolved as quickly as possible.

We look forward to working with the ACMA to ensure the CCH Standard is amended in the most appropriate way.

⁴ ACMA Consultation, Pg 1



2. Introduction

We support the Proposed Amendments to the CCH Standard to the extent they better meet our customers' expectations and will provide an avenue for customers to lodge complaints during a *network outage*. We are also supportive of the changes to the CCH Standard in terms of transparency and accessibility and believe that these positive changes will drive an improved customer experience and more consistent application across CSPs, which will have broader benefits across the industry.

However, as we have highlighted above, the restoration of a *network outage* is an independent process to that of complaints handling and the raising of a complaint will not and cannot expedite the restoration of services.

Our submission responds to the range of issues considered by the ACMA, with a particular focus on highlighting where the Proposed Amendments give rise to increased regulatory burden, but no material benefit to customers in relation to network outages. Notably, we provide examples in our submission to illustrate where this may be the case and, where appropriate, make alternative suggestions that we consider better achieve the objectives of the Minister's Direction.

Our submission is structured as follows:

- Section 3 considers areas where the Proposed Amendments could be improved and a summary of recommended changes that we consider will still achieve the objectives of the Minister's Direction.
- Section 4 outlines our commitment to improved transparency and accessibility and support for the ACMA's general improvements to the CCH Standard including shortened resolution times.
- Section 5 provides specific responses the Consultation Paper questions.
- Section 6 provides concluding remarks.
- Section 7 refers to a marked-up copy of the CCH Standard with our changes (see separate attachment).



3. We support the approach of giving customers a new way to raise complaints during network outages. However, the Proposed Amendments won't significantly improve customer outcomes and will only add to the regulatory burden.

We are committed to creating a process that aligns with our customers' expectations, providing a clear avenue for lodging complaints during a *network outage*. However, it's important to note that while we take complaints seriously, the restoration of network services operates independently from the complaint handling process. Therefore, filing a complaint will not expedite the restoration of services.

The Proposed Amendments need to strike the right balance between achieving customer expectations and the regulatory burden the requirements will impose on carriers/CSPs. It is also important that in all circumstances, customer service and management of other complaints is not negatively impacted by flow on effects of these increased requirements relating to *network outage complaints*.

Our key concerns and alternative proposals are discussed below.

(i) Network outage complaint definition should be amended to require customers to make an expression of dissatisfaction.

The current definition of *network outage complaint* is as follows:

network outage complaint means a service outage report where a carriage service provider has determined under section 17B that there is a reason to suspect a network outage is occurring that is affecting or is likely to affect the consumer.

Note: Subsection 17B(4) provides that where a service outage report relates to a network outage and the sole or predominant cause of that outage is a natural disaster, the report is excluded from the requirements relating to network outage complaints under this instrument. In such cases, a carriage service provider must consider if the service outage report is an ordinary complaint under its complaint handling process pursuant to subsection 17B(1)(c).

This is a very binary definition and, as drafted, will capture all *service outage reports* where the requirements of Section 17B are achieved, whether or not the customer is intending to genuinely engage with a CSP to complain about an outage. In our experience, in the event of an outage, most customers are either contacting us to ensure we are aware of the outage, or simply inquiring as to the status of the outage in an attempt to seek to understand what is going on. They are not necessarily engaging with their CSP to register dissatisfaction, let alone a complaint. We strongly disagree with the TIO's conclusion that in the event of a network outage, there is an expectation all inquiries should be treated as a complaint. We therefore consider that the Proposed Amendments adopted as part of the CCO Standard will, in most cases, be sufficient to address the needs of most customers who usually seek information regarding the status of an outage.

To that end, we consider that the definition of *network outage complaint* needs to be expanded to align with the expanded definition of complaint in the CCH Standard, which requires a customer to make an expression of dissatisfaction. To give effect to the Minister's Direction and address the TIO's concerns, when a customer contacts their provider about a *network outage*, their contact should not automatically



be considered a complaint unless the consumer expresses dissatisfaction and when prompted, advises that they want it treated as a complaint. We consider this to be an appropriate response in the circumstances where otherwise, contact centres may be overwhelmed with traffic and risk poorer customer outcomes. Further, we consider that categorisation of excessive outage queries as complaints could work against timely resolution of underlying technical issues. Complaint management on many occasions would likely require input from technical teams, taking focus away from root cause fixes.

Determining whether the customer does or does not want their network outage inquiry treated as a complaint could easily be facilitated by requiring agents to ask the customer whether they want their *service outage report* to be treated as a complaint. Adopting such an approach will also allow genuine complaints to be handled through the proper complaint handling process, better aligning with customer expectations.

We consider the drafting could be amended as follows to better achieve the intent of the Minister's Direction:

network outage complaint means an expression of dissatisfaction made to a carriage service provider in relation to a service outage report where a carriage service provider has determined under section 17B that there is a reason to suspect a network outage is occurring that is affecting or is likely to affect the consumer a network outage has occurred and the customer is affected by the network outage.

Under the current definitions, the combination of *network outage complaint* and *network outage* means it is possible that our complaints ecosystem could need to increase substantially to cater to this demand, given we would be required to capture and manage a contact even in circumstances where the customer had no intention of seeking any more than a status update or other information at the point of contact in relation to the event. [c-i-c begins]

[c-i-c ends]

This will be further amplified depending on how the ACMA seek to define SLO in the CCO Standard. At its most basic level, the lower the threshold that applies to SLO, the greater the expectation that *network outage complaints* will be logged. [c-i-c begins]

[c-i-c ends]

This does not include the costs to establish new process, additional training requirements etc.

- (ii) Service outage reports prior to the determination of a network outage should not be treated as network outage complaints. Only once a network outage has been determined can a network outage complaint be accepted.***

Section 17B sets out the requirements for determining if a *service outage report* is to be treated as a *network outage complaint*. However, we consider that the section, as drafted, is too vague and will lead to inconsistent applications by CSPs.

The requirements under 17B(1)(a) state that “Where a carriage service provider receives a service outage report, it must take all reasonable steps to determine: (a) if there is a reason to suspect a network outage is occurring; and (b) if so, whether the consumer is affected or likely to be affected by that



network outage; or (c)... whether the report should be treated as a complaint under its complaints handling process.”.

For an agent to appropriately determine whether a *service outage report* should be treated as a *network outage complaint*, the nature of the outage will need to first be appropriately determined by the carrier/CSP as being either a *major outage* or a *significant local outage* as defined under the CCO Standard such that communications commence.⁵ The dynamic nature of network outages means that circumstances can change rapidly, making it difficult to accurately assess and categorise the nature of a customer contact as either a *service outage report* or *network outage complaint*. The complexity in the proposed changes is further compounded by the multiple channels through which customers can report issues, including in-store, messaging, front-of-house voice, or social media interactions. Up until that point, given the discrete information flows between technical teams and front of house teams, agents will not have an ability themselves (unless already advised by the technical teams) to determine with any clarity whether a *major outage* or *significant local outage* has been determined and thus, whether to progress a *service outage report* to a *network outage complaint* or retain it as a mere inquiry.

We recommend the following changes to Section 17B(1) and Section 17B(3) provide the necessary clarity for CSPs whilst still meeting the intent of the Minister's Direction.

17B Determining if a service outage report is a network outage complaint

(1) Where a carriage service provider receives a service outage report, it must take all reasonable steps to determine:

(a) if a network outage has occurred pursuant to section 8 of the CCO Standard; and been

(b) if so, if the customer is affected by a network outage; and

if there is a reason to suspect a network outage is occurring; and

~~(b) — if so, whether the consumer is affected or likely to be affected by that network outage; or~~

~~(c) —~~ if not, or subsection (4) applies, whether the report should be treated as a complaint under its complaints handling process.

and

(3) If a carriage service provider determines that there is ~~a reason to suspect a network outage is occurring~~ and the consumer is ~~being~~ affected by a network outage under subsection (1), it must treat the service outage report as a network outage complaint unless subsection (4) applies or the customer expressly states that they do not want the service outage report to be treated as a network outage complaint.

Including this level of clarity will make for a more consistent application across CSPs and make it easier for agents to determine whether they need to adopt the procedures as specified in Part 3A of the CCH Standard.

⁵ ACMA, [draft_amendments - telecommunications customer communications for outages industry standard 2024.docx](#)



(iii) Retrospective contact with customers who have logged service outage reports, which may later meet the definition of a network outage complaint, should be removed.

Section 17B(2) states that ... “A carriage service provider must take all reasonable steps to make a determination under subsection (1), and if relevant, provide the acknowledgement in subsection 17C: (a) on first contact; or (b) if this is not possible – as soon as reasonably practicable, but no later than 30 minutes after receiving the service outage report.”

In our view, this should be limited to interactions on first contact only. The need to retrospectively contact customers creates an extreme operational burden, which is unlikely to be practical to comply with in all circumstances. Equally, there is a lack of clarity with regard to the number or frequency of contact attempts in a scenario where we are unable to contact a customer to provide a verbal update, and also in circumstances where non-digital customers are impacted by network outages and the only service on their account is the one being impacted.

To address these concerns, we recommend the acknowledgement obligation only apply at the point of contact after a *network outage* has been determined. This approach also avoids unnecessary duplication with the CCO Standard, which already includes obligations for customers to be updated on a regular basis.

By utilising these processes, providers can ensure that customer contacts are handled consistently, and within one single framework and approach.

(iv) For customers who contact CSPs prior to the determination of a network outage, they will then be required to contact their CSP to get their network outage complaint logged after a network outage has been determined.

To make it easy for customers to log faults in the event of a *network outage*, following from (iii) above, we propose the inclusion of additional text in the CCO Standard to require advice to be provided on how a customer can log a *network outage complaint* once a network outage determination has been made. Channelling the complaints in accordance with this advice will help ensure that customers and our agents use the correct process, thus ensuring a better overall experience for customers.

(v) Definition of urgent network outage complaint needs to be narrowed to better reflect those in hardship circumstances.

The proposed definition of *urgent network outage complaint* presents significant concern due to its broad and impractical nature. The proposed definition includes any consumer who expresses a need for urgent assistance using a real-time or near real-time communication method, as well as a priority assistance consumer whose service is affected by a network outage. While we are supportive of the intention to prioritise vulnerable consumers, the broad scope of this definition could lead to an overwhelming number of complaints being classified as urgent. This could dilute the effectiveness of prioritisation processes and strain the resources of telecommunications providers, ultimately leading to delays in addressing genuinely urgent issues. It also creates a risk that the volume of urgent issues requiring attention during a network outage divert resources away from legitimately urgent issues affecting an isolated number of customers in parallel, which are not caused by network outages.



The practical application of this broad definition poses significant challenges. Telecommunications providers may struggle to accurately and consistently identify and categorise urgent complaints, especially during widespread network outages. The requirement to provide urgent assistance to a potentially large number of consumers could result in operational inefficiencies and hinder the timely resolution of critical issues. Additionally, the lack of clear criteria for determining the urgency of a complaint could lead to inconsistent handling and potential disputes between consumers and providers.

The broad definition of *urgent network outage complaint* may inadvertently impact the overall quality of service provided to consumers. By diverting resources to handle a high volume of *urgent network outage complaints*, providers may be unable to adequately address non-urgent complaints in a timely manner. This could lead to increased consumer dissatisfaction and undermine the effectiveness of the complaints handling process. A more targeted approach, with clear and specific criteria for urgent complaints, would ensure that resources are allocated efficiently and that all consumers receive appropriate and timely assistance.

To address these concerns, we recommend the definition of *urgent network outage complaint* is narrowed in scope and limited to circumstances where there is an immediate threat to health or safety. By refining the definition of *urgent network outage complaint* and implementing these recommendations, the Proposed Amendments can achieve their intended goals without compromising the efficiency and effectiveness of the complaints handling process.

(vi) Contact requirements where service is restored (default resolution) are duplicative and can largely be discharged by CSPs requirements under the CCO Standard.

We envisage further challenges with regard to the practical implications of the Proposed Amendments through Section 17(D).

Section 17D (3)(c) requires that the CSP notify the consumer in writing confirming (i) how they can make a complaint seeking a tailored resolution if they are not satisfied with the *default resolution*, (ii) what steps to take if they believe the CSP's attempt to implement the default resolution has been unsuccessful, and (iii) details about any bulk resolution offer. This section does not adequately consider non-digital customers and the implications of needing to provide notifications in writing. This requirement implies that CSPs would need to send physical letters to these customers, which is unlikely to be helpful. In the event of a major network outage, the issue would likely be resolved, and the customer aware of the resolution prior to the arrival of the physical letter. This requirement imposes an unnecessary burden on providers and does not add value to the customer experience.

Proposals to require a CSP to provide a customer with the opportunity to express dissatisfaction with the outcome of the default resolution are circular in nature, as they effectively allow a customer to complain about a complaint. Once the default resolution is implemented, there should be no further action required from the CSP. The current wording implies an ongoing cycle of complaints and responses, which is impractical and inefficient.

The requirement in section 17D(4) to send notifications to customers with, and at the same time as, a notification under section 15 of the CCO Standard, is not practically possible under the proposed drafting. As we have stated earlier in our submission, the restoration of the network outage and management of the complaint are separate, independent processes run by separate teams, using different systems and procedures. Thus, the requirement for a set of communications under section



17(4) of the CCH Standard and section 15 of the CCO to be sent at the same time is infeasible. This is because we would be required to communicate with a number of customers via various methods simultaneously with the publication of a website update. The ability to coordinate such communications in real-time is highly challenging, especially during a major network outage. This requirement does not account for the operational complexities involved and should be reconsidered to allow for more practical communication methods.

In section 17D(5) of the CCH Standard, the need to seek confirmation from a consumer who made an *urgent network outage complaint* about whether the CSP's attempt to implement the *default resolution* has been successful within 2 calendar days of sending the notification in 17D(3)(c) is also unnecessary, and equally unclear regarding contact attempts. It is also already implied in the proposed drafting of 17D(3)(c)(ii). The requirement to seek confirmation from a consumer about the success of the default resolution within 2 calendar days is redundant and adds unnecessary complexity to the process. Section 17D(6) states that a CSP must not close a *network outage complaint* less than 3 working days after sending the notification in 17D(3)(c). This creates a significant operational burden, particularly for larger operators who may have a high volume of customers making contact during a network outage and thus, should be removed, with the complaint closed once default resolution is achieved. The CCO Standard should also then prescribe what communications need to be made to the customer.

We have a number of recommendations to satisfy the intent of section 17D, while maintaining a balance in operational burden and complexity:

- **Flexible communication methods:** Allow for more flexible communication methods that consider non-digital customers and reduce the need for physical letters.
- **Simplified resolution process:** Clarify that once the default resolution is implemented, the complaint is considered resolved, with clear instructions for customers on how to proceed if they are not satisfied.
- **Practical communication requirements:** Reconsider the requirement for simultaneous communications and website updates to allow for more practical and achievable methods. Including leveraging the CCO Standard so communication requirements are housed within the same authoritative source. By sending a notification under section 15 of the CCO, our view is that this should satisfy the broad requirements and intent of section 17 of the CCH Standard in all material aspects. Where these requirements differ, for example the requirement to send information on a potential bulk resolution offer, details could be added to the requirements of the CCO Standard. Drafting in this manner will allow for the deletion of section 17D(3)(c) and section 17D(4) and minimise the impost on CSPs and the number of notifications a customer could potentially receive during the course of an outage.

4. We are committed to improving our customer service and are generally supportive of the Proposed Amendments to improve transparency, accessibility, and shortened resolution timeframes.

At Telstra, we are committed to continually improving our customer service. Our public complaints management policy outlines our complaints processes including escalation options to the TIO. Our complaints teams ensure customers are aware of the escalation process where internal dispute resolution cannot reach an agreed outcome or when resolution of a complaint may take longer than expected.



However, we agree with the ACMA's intent, that customer complaint prominence could be enhanced. To that end, we have taken the proactive step of elevating the information on our website.⁶ At Telstra, customers can easily find information on how to make a complaint via the Contact Us tab on our website, which also includes information on our complaint handling performance in a transparent way.

Equally, we are supportive of Proposed Amendments to the prescribed timeframes for the proposal and implementation of resolutions in the CCH Standard, noting that it is crucial to balance timeliness of resolutions with the quality of resolutions. At Telstra, we are committed to resolving complaints as quickly and reasonably as possible. Shortening the timeframes would require additional resources, to ensure we can meet the new timeframes without compromising service quality, but we remain committed to improving our performance (and that of industry) and thus, are supportive of the changes.

⁶ [Complaints handling reporting - Telstra](#)



5. Consultation paper questions

1. **Is aligning the definition of network outage with the definitions for ‘major outage’ and ‘significant local outage’ from the Customer Communications Standard appropriate? If not, please explain why and describe any alternative and/or other approaches that could be used to define ‘network outage’.**

Yes, it is appropriate to align the definition of *network outage* and with the definitions of *major outage* and *significant local outage* in the CCO Standard.

However, as discussed in our submission to the CCO Standard, we strongly recommend the threshold for the number of end-users affected by a SLO is increased to 10,000 end-users, but we could tolerate 5,000 end-users as the threshold.

The impact to our complaints team will be significant if the threshold is not amended. Costs to serve will increase significantly and we will be required to scale up our operations on the expected number of contacts that then proceed to log a complaint. We discuss these additional complaint related costs in Section 3(i).

2. **Does the amended definition of ‘complaint’, combined with the new ‘network outage complaint’ definition, give effect to the direction’s objective of ensuring consumers who contact their provider in relation to a network outage can attract the protections of the Complaints Handling Standard? If not, please explain why and describe any alternative and/or additional approaches that could be used to meet the objective.**

Yes. We consider the amended definition of *complaint* combined with the proposed *network outage complaint* definition gives effect to the Direction’s objective of ensuring consumers who contact their CSP in relation to a network outage can attract the protections of the CCH Standard. However, as noted in Section 3(i) above, *network outage complaint* should be ringfenced to situations where the customer has made an expression of dissatisfaction.

Ring fencing the definition of *network outage complaint* as described above will help manage efficiency and cost. By distinguishing between routine service outage reports and formal complaints, CSPs can allocate resources more effectively, ensuring that serious issues receive the attention they deserve without overburdening the system with minor issues.

3. **Currently network outage complaints would not be raised if the outage is due to an unplanned adverse impact and the sole or predominant cause is a natural disaster. Should this exception be removed? If so, please explain why and how this could work in practice.**

No. This exception should not be removed.



4. **Is the approach of prioritising the restoration of services over the resolution of other complaints related to network outages appropriate? If not, please explain why and describe any alternative and/or additional approaches that could better meet the objective of prioritising complaints relating to network outages in the direction?**

Yes. The approach to prioritising the restoration of services over the resolution of other complaints relating to network outages is appropriate.

As we have detailed earlier in our submission, in the event of a network outage, our top priority is to restore services as quickly as possible. We understand how frustrating network outages can be for our customers, but it must be understood that submitting complaints about network outages will not speed up the resolution process, as our complaints management process and outage management process are separate. While we strive to resolve outages promptly, the technical complexities involved require the expertise of specialized teams. Therefore, complaints typically do not and cannot hasten the restoration efforts.

5. **Are the proposed processes and actions to prioritise complaints from consumers affected by network outages reasonable and practical? If not, please explain why and describe any alternative and/or additional approaches that could better meet the objective of prioritising complaints relating to network outages in the direction?**

No. The proposed processes and actions to prioritise complaints from consumers affected by network outages are in some cases not reasonable or practicable. Our specific concerns, as well, as alternatives approaches, are explained are discussed in detail in Section 3(i) – 3(vi) of this submission.

6. **The proposed drafting envisages that, if the network problem is rectified but this does not achieve the default resolution of a network outage complaint (restoration of service), then the consumer will need to actively contact their CSP to seek assistance before their network outage complaint is closed. Also, if the default resolution is achieved but the consumer remains dissatisfied with this outcome, they will need to raise a new complaint through the standard, non-network outage complaints process. Are these approaches appropriate? If not, please provide details of alternative ways to manage these scenarios.**

No. Drafting should be amended to reflect that a *network outage complaint* can be closed once the *default resolution* is implemented, while requiring CSPs to offer a mechanism to re-open the *network outage complaint* if the consumer is not satisfied with the resolution and subsequently makes contact.

7. **Is the requirement for CSPs to help keep certain categories of customers connected who contact them in a network outage, and who may be at risk of extra harm due to the loss of service, appropriate and practical? If not, please explain why and describe any alternative and/or additional approaches that could be used.**

No. The requirement for CSPs to keep certain categories of customers connected who contact them in a *network outage*, and who may be at risk of extra harm due to loss of services, is not appropriate nor practical.

This is because the nature of an outage means it's not possible to prioritise restoration of certain customers over others. Network outages typically stem from a single root cause. Once this root



cause is addressed, the issue is resolved for all affected consumers simultaneously. Prioritising individual complaints for remediation is not feasible, as the fix is inherently binary.

However, we recognise that some of our customers carry greater risk, and the impact of an outage could have greater implications. As such, Telstra is able to (and does) apply temporary measures for customers in the event of outages. An example of this is diversions to alternative phones for our Priority Assistance customers (this requires an alternative number to divert to).

As drafted, the definition of *urgent network outage complaint* is unworkable and needs to be narrowed to circumstances where there is an immediate threat to health or safety. Our views are discussed in Section 3(v).

In terms of alternate practical actions CSPs could take, we consider there is a broader and ongoing opportunity to educate customers about improving their communications technology resilience in outages. For example, for our customers with life threatening medical conditions, we continue to advise them of the importance of having multiple devices using different technologies, effectively creating redundancy in the event of a fixed or mobile network outage (because they would have an alternative option). To the broader population, if connectivity is of critical importance, the safest way to maintain that is by having both fixed and mobile services.

8. Are the proposed methods suitable for consumers to contact their CSP about service problems that may be related to network outages? If not, please explain why and describe any alternative and/or additional approaches that would be more appropriate and enable network outages to be captured and handled under the Complaints Handling Standard.

Telstra already provides all the channels specified in the CCH Standard for customers to engage with Telstra. This will continue to apply in the future.

Telstra's view is that any temporary measure, such as that contemplated by the CCH Standard, that is different to the regular enquiry or complaint contact methods to ensure complaints about *network outages* are accepted will add unnecessary overhead without driving a significantly improved outcome for customers. The added administrative burden would slow down the overall response and resolution process, potentially prolonging the outage and affecting all consumers. Temporary methods can confuse consumers about the best way to lodge a complaint, leading to frustration and dissatisfaction so we recommend that any new channels should be adopted in a permanent capacity.

9. Do the proposed requirements in the network outage complaints-handling process set out all the information that would help consumers understand and use this complaints process. Are there aspects of this complaints process that should be changed, added or removed? If so, please explain why and describe any alternative approaches that would be more appropriate.

Yes. We agree that the proposed requirements in the *network outage complaints handling process* set out all the information that would help consumers understand and use the complaints handling process.

10. Do the Proposed Amendments to complaints monitoring and analysis, complaints record-keeping and reasonable assistance obligations appropriately adapt these rules to incorporate the introduction of a network outage complaints category? If not, please



explain why and describe any alternative approaches that would be more appropriate for these areas.

Yes. We consider that the Proposed Amendments to complaints monitoring and analysis, complaints record keeping, and reasonable assistance obligations appropriately adapt these rules to incorporate the introduction of a network outage complaints category.

- 11. Are the Proposed Amendments likely to make it easier for consumers to find their CSP's complaints handling process and improve transparency of this process? If not, please explain why and describe what alternatives or additional measures would achieve this in a way that meets the direction's objectives?**

Yes. We support the ACMA's measures to make it easier for consumers to find their CSPs complaint handling process and improve transparency of the process.

- 12. Are the Proposed Amendments likely to make it easier for consumers to contact their CSPs with a complaint and have it treated as a complaint? If not, please explain why and describe what alternatives or additional measures would achieve this in a way that meets the direction's objectives?**

Yes. The primary focus should be whether the customer can easily get in touch with their CSP, and once in touch, whether they can have their inquiry resolved in a timely manner. We consider the ACMA's Proposed Amendments assist in this process.

- 13. Are the Proposed Amendments likely to make it easier and more accessible for consumers to contact their CSPs with a complaint? If not, please explain why and describe any alternatives or additional measures that would achieve this in a way that meets the direction's objectives?**

Yes. We support the Proposed Amendments which we consider will make it easier and more accessible for consumers to contact their CSP with a complaint.

- 14. Will the proposed changes to complaint resolution timeframes allow sufficient time for CSPs to resolve a complaint in a way that meets the Direction's objectives? If not, please explain why and describe any alternative and/or additional approaches that could be used to meet those objectives.**

Yes. We support the changes to the complaint resolution times. However, we note that it is crucial to balance speed with the quality of resolutions. At Telstra, we are committed to resolving complaints as quickly and reasonably as possible. Whilst shortening the timeframes would require additional resources to ensure we can meet the new requirements without compromising service quality, we remain committed to improving our performance (and that of industry) and thus, are supportive of the changes.

However, we note that a focus on speed should not come at the expense of quality. Complex complaints often require detailed investigations and coordination across multiple departments. It is important to note that reducing timeframes could risk inadequate resolutions and increased follow-up complaints.



Further refinements should be made to make it clear that provided a CSP meets the requirements with regard to Section 14 (*Delays*), the timeframes in Section 13 (*Resolution of complaints*) do not apply.

- 15. Will the proposed changes, combined with existing obligations, provide consumers with clear and sufficient information at appropriate times in relation to avenues for external dispute resolution, specifically the TIO? If not, please explain why and describe any alternative and/or additional approaches that could be used to achieve that outcome.**

Yes.

- 16. Will the proposed changes to align the Complaints Handling Standard with the Financial Hardship Standard adequately support financial hardship consumers with a relevant complaint to have their complaint treated urgently? If not, please explain why and describe any alternative and/or additional approaches that could be used to do so.**

We are broadly supportive of these changes, however for certainty, we would suggest removal of the words “or may be” under the definition of *urgent complaint*.

- 17. What is the earliest practical date before 30 June 2025 for the amended standard to commence? Should it commence earlier than 30 June 2025? If so, please explain why and say what alternative date would be appropriate.**

Telstra takes our customer experience seriously. In order to properly implement the CCH Standard and limit adverse impacts to consumers, the definitions and application of the CCH Standard must be clear, so we have confidence in building new arrangements and training our staff to use them.

The CCH Standard requires significant changes to process, procedures and will require system enhancements. To fully give effect to the new requirements will require substantial investment, including building the technical infrastructure and adjusting how our systems, processes and practices for our network, faults and complaints ecosystems integrate and interact with each other, as well as the upskilling of staff.

Our preference is for the CCH Standard to come into effect in its entirety on 30 June 2025. However, given the challenges detailed in our submission, a period of forbearance is likely to be required. Given we do not expect the ACMA to make the new Standard until 30 April 2025, this leaves a period of only two months in which to complete the building, training uplift and commissioning of the changes. We consider this to be insufficient. The short lead time will likely present a significant compliance challenge if forbearance is not received. We recommend a period of at least 3 months to allow adequate time for CSPs to bed down the new changes otherwise we are concerned that the solutions developed could very well result in a poor customer experience and may lead to CSPs building solutions that are best efforts as opposed to being fully effective.



18. We are seeking feedback on whether any other changes or new rules are needed so that a revised Complaints Handling Standard meets the direction's objectives. If so, please describe any additions or changes you think would be appropriate and explain why.

We provide some further feedback below for the ACMA's consideration.

Existing section	Telstra comments
Definitions	The definition of working day should be revised and standardised across the TCP Code, Financial Hardship Standard and the Domestic and Family Violence Standard, so as to not create unnecessary confusion and risk CSP non-compliance across multiple conflicting instruments.
13(1)(f-j)	<p>There is opportunity to simplify Section 13(1)(f)-(j) by providing consistency across the three sections in (f), (g) and (h) (e.g. "Resolve complaint type within x days").</p> <p>This would create a simpler operating environment for CSPs, whereby there are 3 clear categories of complaints (billing, standard and urgent complaints) with 3 specific timeframes to resolve (which comprises of proposal and implementation).</p> <p>Further with regard to Section 13(j), there is opportunity to simplify (in conjunction with the above) by stating a broader set of circumstances where the resolution timeframes do not apply. We propose changes to include circumstances where:</p> <ul style="list-style-type: none"> • A customer contributes to a delay (e.g. by no response or a delayed response). • The customer is not satisfied with a CSP's initial proposed resolution. • Where the complaint is not able to be resolved within the timeframes due a reliance on a third party to take action (e.g. reliance on nbn co or Opticomm). • Where it is not possible to resolve the complaint within the timeframe (e.g. where significant structural or civil works are required).
14	Can be simplified further in line with suggestions above. (e.g. Section 14(2)(a)-(c) could just cross reference a revised section 13.
17	This section should be clarified in circumstances where the customer does not have a method of communication other than physical whitemail.
Descoping of Account Managed Customers from CHS scope	Account managed customers should be descoped from the CCH entirely. These customers are managed through separate processes and have dedicated resources which will address concerns independently. Adopting the same definition as that taken in the Authentication SPD - Federal Register of Legislation - Telecommunications Service Provider (Customer Identity Authentication) Determination 2022 will simplify requirements for Carriers/CSPs is appropriate.



6. Concluding comments

We believe the issues we have raised in our submission, if addressed as we suggest, will ensure the CCH Standard is applied consistently across carriers/CSPs, improve the customer experience and expectation, whilst raising the overall standard for complaints handling for customers.

We look forward to continuing to work with the ACMA to refine and implement a robust telecommunications complaints handling process.



7. Marked Up CCH Standard

Refer to Draft Amendments - Telecommunications (Consumer Complaints Handling) Industry Standard
2018 – TELSTRA MARK UP