

Proposed amendments to the Telecommunications (Customer Communications for Outages) Industry Standard 2024

10 March 2025

Recommendations

This Submission recommends the ACMA:

- > Amend the thresholds for intervention in definition of 'significant local outage' to ensure it captures smaller communities and mitigates risk to safety and businesses.
- > Enhance the communications obligations for carriers and carriage service providers by mandating more proactive and extensive communication with consumers during outages.
- > Include explicit accessibility requirements within the standard.

About this submission

The Australian Communications Consumer Action Network (ACCAN) is pleased to provide this submission to the Australian Communications and Media Authority (ACMA) on the proposed amendments to the Telecommunications (Customer Communications for Outages) Industry Standard 2024 (the standard).

ACCAN supports the ACMA's efforts to define significant local outages but recommends key refinements to ensure all Australians, including smaller and metropolitan communities, receive adequate protections. By adopting a location-neutral definition, lowering service and duration thresholds, and enhancing accessibility and communication requirements, the framework can better reflect real-world consumer experiences and improve telecommunications resilience.

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**Australian Communications
Consumer Action Network**

Australian Communications Consumer Action Network

ACCAN is the peak national consumer advocacy organisation for communications working to achieve trusted, accessible, inclusive, affordable and available communications and digital services for all Australians.

Introduction

ACCAN welcomes the ACMA's efforts to define significant local outages but believes that refinements are necessary to ensure consumer protection across Australia. The proposed definition should be location-neutral, removing the reference to 'regional or remote Australia' to ensure all communities, including metropolitan areas, are covered. The current threshold of 1,000 affected services is too high, particularly for smaller communities, and should be reduced to 100 or all carriage services provided within an area classified as Statistical Area Level 1 (**SA1**) by the Australian Bureau of Statistics (**ABS**). Additionally, the six-hour duration requirement is excessive and should be reduced to 30 minutes to mitigate risks to safety, businesses, and essential services.

ACCAN also supports clear obligations on carriers and carriage service providers (**CSPs**) regarding natural disaster-related outages. We recommend enhanced multi-channel communication, a central public outage map, and improved accessibility measures to ensure consumers receive timely, accurate, and accessible information. Furthermore, we advocate for an early commencement of the standard, ideally by 1 May 2025, to minimise consumer vulnerability to extended service disruptions.

To strengthen consumer protections, ACCAN recommends additional accessibility provisions, including compliance with Web Content Accessibility Guidelines (**WCAG**) 2.2, Easy English formats, and Auslan translations. We also propose clear timeframes for public notifications, ensuring transparency and consistency in outage communications. By refining the definition and implementing these recommendations, the framework will better serve all Australians, ensuring equitable access to reliable telecommunications.

ACCAN's response to consultation questions

Definition of significant local outage

Question 1: Is the proposed definition of significant local outage workable? If not, please provide suggested wording for an alternative definition giving reasons; Question 2: Does the definition adequately capture outages that are lesser in scale than major outages, but have a significant impact on local communities in the areas that may have lower levels of access to alternative telecommunications networks?

ACCAN considers that the proposed definition needs refinement to ensure adequate safeguards for communications consumers under the standard. Significant local outages can occur anywhere in Australia, including metropolitan areas, where complete service loss in a specific suburb or population centre can have severe consequences. End users should therefore be notified that a significant local outage has occurred even if they remain connected via an overlapping network. Therefore, we suggest the definition should be location-neutral to ensure all consumers in Australia are equally protected. ACCAN recommends removing the reference to a 'distinct location in regional or remote Australia' in the definition because it unnecessarily limits the classification of significant local outages.

ACCAN is concerned that the threshold of 1,000 services is excessively high, especially for smaller communities such as remote Aboriginal and Torres Strait Islander communities where alternative telecommunications options are limited, which may be consistently overlooked if the current

definition is implemented. In many cases, a loss of even 100 services can leave an entire community without connectivity, significantly affecting access to essential services, businesses, and emergency communication. Additionally, the six-hour duration requirement could pose serious risks to consumer safety, as well as having extensive impacts on businesses and essential services in the affected areas.

To better reflect the consumer impact of significant local outages, ACCAN recommends the definition be adjusted to:

- Remove the reference to regional or remote Australia, so all Australians are adequately protected by the standard.
- Reduce the service threshold to 100 to ensure that smaller communities experiencing total service loss are captured by the standard.
- Recognise complete service loss in an ABS-defined SA1, ensuring that an outage affecting an entire town or Aboriginal and Torres Strait Islander community is captured, even if the number of affected services is below the threshold.¹
- Reduce the duration threshold to 30 minutes to ensure timely responses, particularly in areas with little or no redundancy in telecommunications services.

By adopting a location-neutral, consumer-focused definition, the framework will better reflect the realities of service disruptions and ensure timely intervention for all affected communities, regardless of size or geography. ACCAN urges further consideration of these refinements to ensure the definition is equitable, practical, and responsive to consumer needs.

Outages caused by natural disasters

Question 3: Are there concerns about the imposition of requirements on carriers and CSPs in relation to outages caused by natural disasters? If yes, please explain.

ACCAN supports the introduction of more explicit communication obligations on carriers and CSPs during outages caused by natural disasters. Additional coordination and sharing of information between carriers, carriage service providers and other relevant stakeholders is essential during natural disasters. Ensuring that communications consumers, emergency services, and relevant stakeholders receive timely and accurate information is critical for public safety and preparedness.

Question 4: Can you suggest an alternative way to manage communications with customers and the public during outages caused by natural disasters so that the objectives of the direction are met?

ACCAN advocates for timely, accurate, and accessible communication with consumers during outages caused by natural disasters. To enhance information delivery and public safety, we recommend:

¹ SA1 is the smallest geographic unit used by the ABS for Census data, typically covering 200 to 800 persons. Using SA1 ensures the definition captures outages affecting an entire localised area, such as a neighbourhood, suburb, small town, or Aboriginal and Torres Strait Islander community, rather than relying solely on service count thresholds.

- **Comprehensive Multi-Channel Communication:** Carriers and CSPs should utilise diverse communication channels, including real-time outage dashboards, targeted SMS alerts, dedicated helplines with pre-recorded updates, websites, local government coordination, and community information hubs. This ensures critical information reaches all consumers effectively, particularly those with limited connectivity or no internet access.
- **Centralised Public Outage Map:** Develop a national outage map, hosted by ACMA, where all carriers and CSPs provide real-time disruption data. This mobile-friendly platform should offer clear notifications and estimated resolution times.
- **Consumer Education and Preparedness:** Launch public awareness campaigns to inform consumers about outage expectations and alternative services.²

By implementing these strategies, carriers and CSPs can improve outreach and reduce confusion during natural disasters, ensuring timely information reaches affected communities.

Feasibility and cost

Question 5: For carriers and carriage service providers, what are the likely costs and benefits of implementation for your organisation? (Please provide specific cost estimates in your response.) Are there alternative ways to achieve the objectives of the direction that would be consistent with its terms and provide for lesser costs and/or greater benefits?

ACCAN has no comments.

Artificial Intelligence

ACCAN has no comments.

Commencement

Question 6: We are seeking views, and the reasons for them, on the earliest practical date for the standard for significant local outages to commence in full, noting that this must be no later than 30 June 2025.

ACCAN advocates for the earliest possible implementation of the standard for significant local outages to enhance consumer protection and improve transparency regarding communications service disruptions. Given the critical impact that outages can have on communities, businesses, and emergency services, any unnecessary delay in implementation could leave consumers vulnerable to extended service disruptions without adequate notification and response measures.

ACCAN does not have any insights into the systems or other technical challenges that industry may face to implement the requirements of this standard. Ideally, ACCAN would like to see the standard implemented by 1 May 2025. This timeline would allow two months to monitor and make any necessary adjustments before the final 30 June 2025 deadline, ensuring a smoother transition and immediate consumer benefits.

² See, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 'How communities can prepare for telecommunications network outages' (Web Page, n.d.) <<https://www.infrastructure.gov.au/media-communications-arts/phone/communications-network-outages-emergencies-and-natural-disasters/how-communities-can-prepare-telecommunications-network-outages>>.

To facilitate a timely and effective rollout, we recommend the following:

- A phased implementation approach, allowing carriers and CSPs to start internal compliance processes as soon as possible to avoid last-minute operational delays.
- Industry collaboration with consumer and regulatory bodies, including ACCAN, ACMA, and the TIO, to proactively address potential challenges before full implementation.
- Clear communication from carriers and CSPs to the public, ensuring that consumers are informed of their rights under the new standard from the beginning.

ACCAN supports prioritising the earliest practical date for implementation to minimise further delays and enable consumers to benefit from improved outage notifications and accountability measures as soon as possible.

Additional/alternative requirements

Question 7: In relation to the draft amendments to the standard:

- *Are there any additional matters aligned to the objectives that should be included but have not been?*
- *Are there any matters that have been included for which alternative arrangements should be considered?*

Please provide evidence to support your submission.

As previously mentioned in ACCAN's submission to the ACMA's consultation on the standard in October 2024, we continue to have significant concerns about the lack of provisions regarding accessibility.³ We recommend the ACMA make substantial revisions to the standard with regards to accessibility, including the following changes:⁴

- Replace all mentions of the word 'accessible' as it is currently used in the document, substituting it with the word 'available.'
- Creating an 'accessibility' section within the standard, governing the communications that the regulated entities are to provide, including provisions to ensure that:
 - All outage-related information provided on websites or via social media must comply with the latest version of the WCAG 2.2 to a minimum of AA Level.
 - All outage-related information on websites, social media and other written formats is provided in 'plain language,' i.e. to a 'lower secondary education reading level.'⁵
 - Ensuring communications are also provided in Easy English.⁶
 - Providing Auslan translations of written information in accordance with the guidelines for English into Auslan Video Production.⁷

³ ACCAN, *Telecommunications (Customer Communications for Outages) Industry Standard 2024* (Submission, ACMA, 23 October 2024).

⁴ Ibid 7.

⁵ Commonwealth of Australia, 'Plain language and word choice', *Australian Government Style Manual* (Website, 2024) <<https://www.stylemanual.gov.au/writing-and-designing-content/clear-language-and-writingstyle/plain-language-and-word-choice>>.

⁶ Commonwealth of Australia, 'Easy Read', *Australian Government Style Manual* (Website, 2024) <<https://www.stylemanual.gov.au/content-types/easy-read>>.

⁷ Gabrielle Hodge, Della Goswell, Lori Whynot, Stephanie Linder and Cathy Clark, *What Standards? The need for evidence-based Auslan translation standards and production guidelines* (Report, 2015).

- Ensuring all phone numbers and other contact details displayed visually on television be verbalised (i.e. spoken aloud).
- Ensuring captions and transcripts for video and audio content are made available.
- Providing text alternatives to images, where outage areas are shown on a map.

Furthermore, the standard requires carriers and CSPs to provide public notifications and website updates for major and significant local outages. However, it does not specify the frequency of updates or a minimum timeframe for public notifications. To ensure consistency and reliability for consumers, ACCAN recommends:

- A maximum timeframe of 30 minutes from the identification of a major outage or significant local outage for an initial public notification (where practical).
- Regular status updates at least every two hours until resolution, ensuring consumers remain informed of expected restoration times.
- Final notification within 30 minutes of service restoration, confirming that the outage has been resolved.

By implementing clear timeframes, consumers will have greater certainty and confidence in the information provided, preventing misinformation and ensuring timely access to alternative solutions where necessary.

Conclusion

ACCAN strongly advocates for a consumer-focused, location-neutral, and accessibility-inclusive customer communication during an outage. By refining the current definition of significant local outages and implementing clear communication obligations, the ACMA can ensure that all Australians receive timely and adequate protection against communications disruptions. Additionally, early implementation of the standard will minimise risks to consumers, businesses, and emergency services. ACCAN urges the ACMA to adopt these refinements to build a fair, practical, and effective framework that prioritises consumer needs and network reliability.

We thank the ACMA for the opportunity to comment on the standard. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact Dr Amelia Radke, Senior Policy Adviser, at [REDACTED].

The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers. ACCAN is committed to reconciliation that acknowledges Australia's past and values the unique culture and heritage of Aboriginal and Torres Strait Islander peoples. [Read our RAP.](#)
