



ACMA engagement – Proposed amendments to the Telecommunications (Customer Communications for Outages) Industry Standard

Telstra Group Limited Consultation Response

Public submission

19 March 2025



Introduction and Executive Summary

Telstra welcomes the opportunity to make a submission to the Australian Communication and Media Authority's (ACMA's) consultation on the proposed amendments to the Telecommunications (Customer Communications for Outages) Industry Standard (the CCO Standard) 2024¹ (Consultation paper). Our submission responds directly to the questions posed in the Consultation paper, along with proposals for additional changes to the CCO Standard.

Telstra appreciates the importance of providing clear communications about outages to customers. We already seek to communicate with our customers expeditiously, and in a manner that informs them of what they need to know, while managing the risk of inaccuracies arising from premature notification, and notification fatigue.

We are supportive of many of the proposed changes to the CCO Standard but have concerns that other changes will lead to notification fatigue, or cause burden on carriers and Carriage Service Providers (CSPs) that are disproportionate to the benefit for customers.

We support the following amendments:

- **Additional requirements for outages arising from natural disasters:** Telstra supports the proposed removal of the current exemption that applies to customer communications for natural disasters, such that responsible carriers and CSPs are now only required to publish relevant information on their websites.² We believe the proposed arrangement is workable, considering it does not impose any additional obligations on CSPs to undertake the more onerous task of notifying end-users.
- **Artificial Intelligence (AI) reference to be removed:** Telstra supports the removal of the reference to AI which aligns with our position from our January 2025 submission to the ACMA *targeted engagement – Tranche 2 of proposed amendments to the Telecommunications (Emergency Call Service) Determination*³ (Targeted engagement). We also support the requirement that an end-user should be able to speak to a person in the event of a major outage or a significant local outage⁴.

We are very concerned about the impact and feasibility of other aspects of the proposed amendments, especially in relation to the definition of a *significant local outage* (SLO). The current drafting of the CCO Standard will cause significant burden on industry, firstly in generating and managing the significant number of notifications triggered by the proposed thresholds, and secondly (and more importantly), the massive cost to carriers and CSPs arising from under the Telecommunications (Customer Complaints Handling) Industry Standard (CCH Standard) that forces a customer's service outage report to be treated as a complaint. This requirement, if not changed,⁵ forces carriers and CSPs to handle reports of a service outage through our complaint processes, adding cost to our business, in the [C-I-C Begins] [C-I-C Ends] for Telstra alone, and the risk of frustrating customers who simply wanted to inform us that their service is out (as some customer segments are likely to do).

¹ The ACMA, February 2025, *Proposed amendments to the Telecommunications (Customer Communications for Outages) Industry Standard 2024 Consultation paper*, available at https://www.acma.gov.au/sites/default/files/2025-02/Proposed%20amendments%20to%20the%20Telecommunications%20%28Customer%20Communications%20for%20Outages%29%20Industry%20Standard%202024_paper_0.pdf

² The ACMA, 2025, s12B, p.9, *Draft Amendments - Telecommunications (Customer Communications for Outages) Industry Standard 2024*, available at <https://www.acma.gov.au/consultations/2025-02/improving-customer-communications-outages>

³ Telstra, January 2025, *Telstra Group Limited Consultation Response - ACMA targeted engagement – Tranche 2 of proposed amendments to the Telecommunications (Emergency Call Service) Determination*

⁴ The ACMA, 2025, s16, pp11-12, *Draft Amendments - Telecommunications (Customer Communications for Outages) Industry Standard 2024*, available at <https://www.acma.gov.au/consultations/2025-02/improving-customer-communications-outages>

⁵ Please see our submission on the CCH Standard for details.



As the CCO Standard is currently drafted, notification fatigue is also a likely outcome, even for small populations, because of the introduction of the SLO. Ongoing daily notifications until the original fault is “fully rectified” could result in daily notifications for many months where major infrastructure is damaged, despite temporary facilities having restored service. Additionally, notification of an outage that occurs during the night is likely to be perceived as irrelevant (or annoying), especially if service is restored before they wake up, and therefore risk diminishing the value of such notifications.

The definition of an SLO needs to be amended to find a better balance between providing a good customer experience and supporting carriers and CSPs to implement solutions that are affordable and realistic.

To address these concerns Telstra is seeking the following adjustments to the proposed amendments:

- **Removal of inner and outer regional locations:** Telstra strongly supports exclusion of Major Cities,⁶ for the reason the ACMA cites in the Consultation paper; namely, the availability of alternative telecommunications networks. Removing Major Cities also reduces reporting burden on carriers and CSPs. Extending this same logic, we propose the exclusion of both Inner Regional Australia and Outer Regional Australia areas from the CCO Standard. Using the ACMA's justification for the exclusion of Major Cities, fixed networks will have good mobile coverage and vice versa in both Inner Regional Australia and Outer Regional Australia. Further, overlapping coverage from multiple mobile base stations in regional towns means localised outages (one base station) are unlikely to disrupt overall mobile coverage in that town.⁷ We propose the removal of both Inner Regional Australia and Outer Regional Australia areas from the SLO in the CCO Standard to reduce the notification, reporting and complaints handling burden on carriers and CSPs.

If both Inner Regional Australia and Outer Regional Australia areas are removed from the CCO Standard, then Telstra supports the threshold of 1,000 end-users (experiencing an outage for over 6 hours) for the SLO.

- **Increase the number of services threshold for SLO:** Telstra acknowledges the ACMA increased both the duration and number of services for the SLO in this consultation compared to the Targeted engagement. However, if Inner Regional Australia and Outer Regional Australia areas are **not** removed from the CCO Standard, then we are still greatly concerned that the number of services threshold is too low. Telstra reiterates our position from our submission to the Targeted engagement⁸ that a trigger threshold of 10,000 services for more than 6 hours, is required to avoid “notification fatigue” for end users and avoid the unreasonable burden on carriers and CSPs which outweighs any incremental benefits for end users.
- **Scope of carriage services captured by major outage and significant local outage definitions:** The scope of services captured by major and significant local outages is too broad, capturing all services delivered by carriers on behalf of CSPs including those such as IoT communications, Foxtel connections, and email. We understood the primary focus of the Bean recommendations was to address the ability of end users to make emergency calls and continue to have access to essential business services and be able to contact friends and family. To address this focus and make the CCO Standard more workable, the definitions need to be

⁶ There are five categories of remoteness in the Australian Statistical Geography Standard (ASGS) Remoteness Structure; Major Cities of Australia, Inner Regional Australia, Outer Regional Australia, Remote Australia and Very Remote Australia. For details, see: <https://www.abs.gov.au/statistics/standards/australian-statistical-geography-standard-asgs-edition-3/jul2021-jun2026/asgs-edition-3-structures> The ACMA proposes that Major Cities Australia is excluded from the requirement for SLO notifications.

⁷ Although, capacity may be reduced.

⁸ Telstra, January 2025, p2, *Telstra Group Limited Consultation Response - ACMA targeted engagement – Tranche 2 of proposed amendments to the Telecommunications (Emergency Call Service) Determination*



restricted to apply only to essential transport services like voice calling, broadband data, and SMS.

Additionally, there is a need to clarify whether the number of affected services refers to the typical number of actual services in use during an outage or the number of end-users who would be unable to access a service, regardless of whether they attempt to use the service or not. We understand the latter is the correct interpretation, and the definitions should be updated accordingly.

- **“Fully rectified” versus “service restored”:** We are concerned that continuing notifications to end users once every 24 hours⁹ until a service is *fully rectified* will result in notification fatigue. We interpret “fully rectified” as meaning the equipment originally experiencing the outage is replaced or repaired. In the case of a natural disaster (bushfire, flood, etc) that damages major infrastructure (e.g., 50m lattice tower for a mobile base station), inclusive of planning approvals, construction, etc, this can take over 6 months or even a year. Naturally, we will deploy temporary facilities (e.g., a cell-on-wheels) to restore the customers’ “services”, but the outage is not fully rectified until the original infrastructure is replaced/repaired/restored.
- **Notify end-users wishing to make a complaint of options after an outage is restored.** The CCH Standard includes changes to inform end-users of the steps they should take in the event they are not satisfied following restoration of the affected services, and wish their service outage report to be treated as a complaint. We support the ACMA’s intention to ensure end-users are informed of the appropriate options and steps, but consider the delivery of the **notification** to be part of the process under the CCO Standard in relation to the resolution of the MO or SLO; not part of the CCH Standard.
- **Refer to “Controlled network”, not “Telecommunications network”:** MO and SLO in the CCO Standard refer to an unplanned adverse impact to “a telecommunications network”, whereas the Telecommunications (Emergency Call Service) Determination 2019 (the ECSD) typically applies to a carrier or CSP’s “controlled network” and/or “controlled facilities”. These should be aligned, and we recommend the ECSD and the CCO Standard should both refer to “controlled networks” and “controlled facilities” (not to “Telecommunications network”).
- **Date of effect:** The Telecommunications (Customer Communications for Outages Industry Standards) Direction 2024 (the Minister’s Direction) requires the changes related to SLO to “*commence in full at the earliest practical opportunity and no later than 30 June 2025*”.¹⁰ Due to the increased volume of notifications, as required to meet the SLO obligations, automation of the notifications (i.e., software changes to automatically, rather than manually, generate the notifications) is required. This is unlikely to be achieved by 30 June 2025, but we will manually generate notifications from the date of effect, and switch to automated notifications once our systems are ready, to comply with the obligation. Our ability to comply by 30 June 2025 is also dependent on the ACMA making adjustments to narrow the scope of the SLO definition as outlined above.
- **Establishing and maintaining a carriage service:** We think it is important that the existing definition of *major outage* and the proposed definition of *significant local outage* (SLO) do not capture end users that continue to have service during an outage through the use of a back-up facility¹¹. So the reference to a user’s inability to “*establish and maintain a carriage service*” in both definitions is helpful, i.e., the ability of an end user to establish and maintain a carriage

⁹ Telecommunications (Customer Communications for Outages Industry Standards) 2024, section 14(3)(b)(ii) but “fully rectified” is also applicable for section 15. Available at: <https://www.legislation.gov.au/F2024L01447/asmade/text>

¹⁰ Telecommunications (Customer Communications for Outages Industry Standards) Direction 2024. Section 5(4)(b). Available at: <https://www.legislation.gov.au/F2024L01060/asmade/text>

¹¹ It is not uncommon for fixed services to be supplied to consumers with mobile (e.g., 4G) backup.



service is not compromised where a back-up facility that forms part of the service offering to the end user operates as intended.

However, we also note users do not establish and maintain carriage services – only carriers and CSPs can do this. Further, as already discussed, the reference to carriage services captures all services, regardless of whether they are critical for end users. So, we suggest this is resolved by changing the language to something like “*access and maintain access to a relevant service*”.

Finally, we remain concerned that the impact of the proposed changes to the CCO Standard will disproportionately impact smaller players in the telecommunications market, and we recommend the ACMA proactively engage with MVNOs and smaller CSPs on this issue, to understand the extent to which these obligations will have a greater impact on smaller players.



Contents

Introduction and Executive Summary	2
1. Telstra responses to the ACMA's issues for comment	7
1. Definition of significant local outage	7
2. Outages caused by natural disasters.....	12
3. Feasibility and cost.....	13
4. Artificial Intelligence	15
5. Commencement	15
6. Additional/unnecessary requirements	15
2. Telstra proposals for additional changes to the CCO Standard.....	18



1. Telstra responses to the ACMA's issues for comment

In this section of our submission, we address the seven questions contained in the consultation paper.

1. 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.

No. The current definition of SLO is not workable, for five reasons:

1. The use of the term “carriage service” (in the phrase “... *establish and maintain a carriage service*;)” is too broad, as it captures unintended service types including machine-to-machine type communications (e.g., “IoT”), streaming video, Foxtel connections, and email;
2. End-users do not “*establish and maintain carriage services*” – only carriers and CSPs do this;
3. Inner Regional Australia and Outer Regional Australia, as per the ABS Remoteness Structure definitions, should be removed;
4. If Inner Regional Australia and Outer Regional Australia are not removed, then the scale of the number of likely affected users should be lifted to 10,000 services to avoid “notification fatigue” and avoid creating an unreasonable burden on industry without a corresponding substantiated uplift in consumer benefit;
5. The term “likely to affect” should be clarified to show that this is regardless of whether end users *intend* to use the service (e.g., regardless of whether they’re asleep).; and
6. The use of the term “telecommunications network” should be amended to “controlled networks and controlled facilities” for consistency and to align with the terminology used in the ECSD.

For consistency, the first, second, fifth and sixth items above must also be applied to the definition of major outage (MO).

In our answer to Question 1 we address items 1, 2, 3 and 5. We address our concerns on the fourth item (i.e., threshold for number of affected services in SLO is too low) in our answer to Question 2, given Question 2 is specifically focused on scale. We address our concerns on the sixth item (i.e. the use of the term “telecommunications network”) in our response to Question 7 (specifically 7a).

The reference to carriage service is too broad

The use of the term “carriage service” inadvertently captures unintended service types. A carriage service is defined in the Telecommunications Act as:

carriage service means a service for carrying communications by means of guided and/or unguided electromagnetic energy.¹²

The definition of carriage service in turn refers to the definition of a “**communications**”. Communications is defined in the Telecommunications Act as:

¹² Telecommunications Act, 1997 Cth.



communications includes any communication:

- (a) whether between persons and persons, things and things or persons and things; and
- (b) whether in the form of speech, music or other sounds; and
- (c) whether in the form of data; and
- (d) whether in the form of text; and
- (e) whether in the form of visual images (animated or otherwise); and
- (f) whether in the form of signals; and
- (g) whether in any other form; and
- (h) whether in any combination of forms.

Referencing a “carriage service” in the definition for both MO and SLO is very broad as it captures all forms of “communications” delivered by carriers and CSPs, including machine-to-machine type (IoT) communications, over-the-top services such as streaming video (e.g., Netflix), Foxtel connections and email.¹³ We understood the primary focus of the Bean recommendations was to address the ability of end users to make emergency calls and continue to have access to essential business services and be able to contact friends and family, and services such as IoT, streaming video etc, sit outside this concern.

To make the CCO Standard more workable and helpful for end users, the definitions need to be refined to clarify that they only apply to the loss of underlying transport services (i.e., the underlying *voice, data or SMS connectivity*). Reframing the terminology away from “carriage service” to “relevant service” avoids inadvertently capturing communications such as email, streaming video, etc, which are forms of “communications” as defined in the Act. We request the ACMA change “carriage service” in the introductory text and in subsection (a) of both the MO and SLO definitions, as well as subsection (b)(ii) of the MO definition, to “relevant service” (see next page), and flow through the CCO Standard as required. This will require the introduction of a new term “*relevant service*” into the definitions section of the CCO Standard, as immediately below:

relevant service means STS, PMTS, broadband data service or SMS, excluding IoT devices.

Note that “SMS” and “STS” are not defined in the CCO Standard, so definitions should also be added:

SMS means short message service.

STS means standard telephone service.

End-users do not establish and maintain carriage services

Secondly, end-users do not establish and maintain carriage services; only carriers and CSPs do. We suggest this is resolved by changing the language in the definitions of both MO and SLO to refer to “access to” a relevant service, i.e., “***access and maintain access to a relevant service***”.

Inner Regional Australia and Outer Regional Australia should be excluded

Thirdly, the definitions of Inner Regional Australia and Outer Regional Australia should be excluded. The same logic applied by the ACMA for excluding metro areas from the SLO definition applies for Inner Regional Australia and Outer Regional Australia; namely end-users in these locations readily have access to alternative telecommunications services. To further illustrate this with an example, mobile base

¹³ To illustrate with an example, Telstra has email servers that deliver our Bigpond email service. If these email servers (and only these email servers) experienced an outage such that emails were not delivered for several hours, then under the definitions in the Standard and the Telecommunications Act, this would be a major outage, because we have over 100,000 customers who are unable to send an email (a type of “communications”).



stations can easily have coverage of 1,000 services, especially in reasonably populated areas, such as regional towns. These townships are often served by multiple base stations, and in the event of the loss of a single base station, neighbouring base stations will automatically expand their coverage (because devices will connect to a base station further away), making it difficult to determine whether the customer is “unable to establish or maintain a carriage service” (as per the ACMA’s drafting).

However, in more remote locations, where a township is likely to be serviced by only one or perhaps two base stations, it is more straightforward to determine which customers are affected, and therefore to provide communication in accordance with the CCO Standard.

Excluding Inner Regional Australia and Outer Regional Australia also reduces the risk of notification fatigue arising from notifications advising of an outage where the customer has not lost service, because, for example, the customer has connected to a neighbouring base station.

Clarify “likely to affect”

Lastly, we are concerned the phrase “likely to affect” does not adequately consider whether end users intend to use the service. It could, quite reasonably, be argued that people asleep at 3am are not “likely to be affected” by a voice network outage if they are asleep and have no intention of calling someone. The ACMA has indicated “likely to affect” is agnostic as to whether end users *intend* to use the service or not, because if there is an emergency and an end user needs to call Triple Zero they would be *affected*. We recommend the CCO Standard is updated to clarify that “likely to affect” applies even where end users do not intend to use the service. We propose this is done in section 5 of the explanatory statement accompanying the CCO Standard.

Given the above points, and noting that we address the threshold number of services in our answer to Question 2, we request the ACMA amend the definitions of MO and SLO, as follows:

major outage means any unplanned adverse impact to a telecommunications network used to supply ~~carriage services~~ a relevant service to end-users that:

- (a) results in an end-user being unable to ~~establish access~~ and maintain access to a carriage relevant service; and
- (b) affects, or is likely to affect:
 - (i) 100,000 or more services in operation; or
 - (ii) all ~~carriage services supplied using the telecommunications network~~ relevant services in a State or Territory; and
- (c) is expected to be, or is, of a duration longer than 60 minutes.

significant local outage means any unplanned adverse impact to a telecommunications network in a distinct location in ~~regional or~~ remote Australia used to supply ~~carriage services~~ a relevant service to end-users, that:

- (a) results in an end-user being unable to ~~establish access~~ and maintain access to a carriage relevant service;
- (b) affects, or is likely to affect ~~1,000~~ 10,000¹⁴ or more services in operation;
- (c) is expected to be, or is, of a duration longer than 6 hours; and
- (d) is not a major outage.

¹⁴ Note: this change is not required, if the ACMA removes Inner Regional Australia and Outer Regional Australia from the definition of SLO, as per our proposal.



In the explanatory statement accompanying the CCO Standard, we propose the addition of the following short sentence:

‘Likely to affect’ applies regardless of whether end users intend to use the service or not.

Also note that the changes described above require the definition of “regional or remote Australia” (as defined in section 5 of the CCO Standard, to also be amended to remove Inner Regional Australia and Outer Regional Australia, thus:

~~regional or remote~~ **Australia** means the area classified as ~~Inner Regional Australia, Outer Regional Australia,~~ Remote Australia or Very Remote Australia under the ABS Remoteness Structure.

We have captured all the above changes in our attached mark-up of the draft amendment instrument and accompanying explanatory statement.

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?

Telstra Response:

If the ACMA continues to include Inner Regional Australia and Outer Regional Australia areas in the SLO definition, Telstra is concerned that the threshold number of affected services in the proposed SLO definition is unworkable as it will: 1) result in “notification fatigue” for end users; and 2) will also drive significant costs into the industry disproportionate to any attendant public benefit (with our concerns equally applicable to its use in the CCH Standard and the CCO Standard). We address both concerns below, and we strongly recommend the threshold for the number of services affected by an outage is increased to 10,000 services.

Firstly, “notification fatigue”. Table 1 below shows the number of notifications per day for various threshold numbers of services (1,000, 2,000, 5,000, etc) using data compiled for mobile outages¹⁵ occurring over the last six months and across all four regional and remote classifications (i.e., all except Major Cities).

¹⁵ Telstra is no longer the carrier for most residential and business fixed-line services; that is the remit of the NBN. Telstra is a CSP for most fixed line services we (re-)sell.



[C-I-C Begins]

[C-I-C Ends]

Table 1: Approximate notifications per day for various thresholds

“Notification fatigue” occurs when recipients receive too many notifications or irrelevant or inaccurate ones, leading them to either ignore the notifications, or worse, become frustrated by them. While each individual notification will only apply to a small number of end users,¹⁸ we are concerned that the cumulative effect of so many notifications will tire the public to the point where they largely ignore them. It is worth bearing in mind that outages are not an even distribution, especially at the local scale. Some parts of the network can remain stable for many years, whereas other parts of the network, especially where there may be aging equipment or unreliable mains power supply, can experience numerous short duration outages over a short period of time, until the underlying cause is remedied.

It is also important to remember that in addition to end-users, outage notifications are to be sent to government stakeholders who may also experience notification fatigue. Further, under sections 12(1)(b) or 12A(1)(b), 12B(1), and on an ongoing daily basis under section 14(2)(b)(ii), we are required to put information on our website. Multiple notifiable outages per day could be confusing for end-users seeking update information on remediation work, especially if there are multiple (but discrete) localised outages in a common area (i.e., two separate outages affecting >1,000 people that are in close proximity).

Secondly, burden. We are concerned about the burden to carriers and CSPs, where there hasn’t been a clearly established benefit for the public. In our January 2025 submission to the Targeted engagement, we provided commentary on the ACMA’s Impact Analysis¹⁹ which covered the proposed introduction of the CCO Standard, using major outages only, not SLOs. The Impact Analysis anticipated “*15 outages over a 13-year period*” as likely to be captured by the proposed reforms, and on that basis estimated the total costs to the telecommunications industry to comply with the CCO Standard are anticipated to amount to \$10.5 million per annum (present value of over \$115 million over ten years).²⁰

We have estimated the cost to Telstra of implementing an automated solution to meet the obligations of the CCO Standard (as drafted, including the introduction of the SLO) in our answer to Question 4. Assuming similar costs are incurred by other carriers, and that a pro-rated cost is also incurred by CSPs, MVNOs, etc, the total cost to industry would be well in excess of the Impact Analysis. Obviously, capital costs of deploying an automated solution are agnostic to the number of notifications. However, there is a point (volume of notifications) below which an automated solution would not be required. This is more likely for CSPs who only supply a subset of services (e.g., mobile but not fixed) or who operate in a subset of states/territories around Australia. If the scale of notifications were lower, some CSPs may elect to avoid the capital cost of an automated solution altogether.

¹⁶ [C-I-C]

¹⁷ [C-I-C]

¹⁸ Population sizes will be between 1,000 end-users and 100,000 end-users, after which, it becomes a major outage.

¹⁹ ACMA *Improving telco communications to stakeholders during outages - Impact analysis*. November 2024. Available at: https://oia.pmc.gov.au/sites/default/files/posts/2024/11/Impact%20Analysis_0.pdf

²⁰ Ibid, pp 28, 33.



Even for Telstra, “automating” a solution is never 100% fully automated; there is always some manual oversight. Any manual work scales linearly with volume and drives cost.

We also want to draw the ACMA’s attention to our submission on the CCH Standard, which anticipates that complying with the CCH standard will drive significant operational cost into our business. The scale of the incremental cost is directly proportional to the number of end users (in aggregate) who are notified, and who, as a result of the notification, place a report or inquiry into Telstra about the outage. More detail can be found in our submission on the CCH Standard, and the important implication for this submission on the CCO Standard is that there is a substantial increase in these costs if the threshold for the SLO is reduced from 10,000 end-users to only 5,000 end-users, and an even more significant increase in reducing to 2000 end-users. Our very strong recommendation is the end-user threshold for SLO is set to 10,000. However, we consider we could tolerate 5,000, but not 2,000 end users.

Ultimately, we are concerned that a high volume of notifications is potentially detrimental to the best interests of end-users, other CSPs, the emergency call persons and other stakeholders who may struggle to distinguish notifications regarding serious outage events from others. We are also concerned about the burden to industry.

For these reasons, if Inner Regional Australia and Outer Regional Australia are not removed from the definition of SLO, then the threshold for the number of end-users affected by a SLO must be increased to 10,000 end-users (and >6 hour duration), although we could tolerate 5,000 (and >6 hour duration) end-users as the threshold. We have reflected this in the proposed mark-up of the SLO definition, both above in our answer to Question 1, and in the attached mark-up of the amendment instrument.

2. 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

We support sections 9(2), 9A(2) and 12B and the imposition of requirements on carriers and CSPs in relation to outages caused by natural disasters. Telstra believes that this obligation is workable, as it does not impose any obligations on CSPs to undertake the more onerous task of notifying end-users.

Telstra already has significant protocols in place to notify our customers in relation to outages associated with natural disasters.

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?

Telstra is concerned that the imposition of standardised (i.e., inflexible) requirements on carriers and CSPs in relation to outages caused by natural disasters may not necessarily provide customers with the information they need during a natural disaster. There are a range of factors that influence how customers are informed about an outage during a natural disaster including:

- The communication methods will vary depending on the nature and circumstances of the disaster.
- The changeable nature of natural disasters makes it difficult to create ‘one-size-fits-all’ obligations.
- The circumstances of the customer will affect the amount of communication they wish to receive from carriers and CSPs. There is potential for customers to suffer from information overload that overwhelms the customer, or creates an annoyance.



- Customers will also be provided with information about the nature of a natural disaster event from a range of other information sources that may provide conflicting information, creating potential for scepticism among customers regarding the reliability of information they are receiving.

Telstra has pre-existing processes and procedures established for handling mass service disruptions (MSDs) caused by natural disasters. These processes allow sufficient flexibility for us to adopt different communications methods that allow us to dynamically adjust to the changing nature of the event.

3. 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?

Given the volume of SLOs at the proposed threshold of 1,000 end-users, we will need to develop an automated system for outage management and communication. There are capital costs (CapEx) associated with building and maintaining an automated solution to perform outage impact assessment and communications to our customers. Unlike operational costs (below), CapEx does not scale with the number of notifications. Our estimated CapEx costs are shown in Table 2 below.

[C-I-C Begins]

[C-I-C Ends]

Table 2: Capital costs to build an automated solution for SLO notifications

Telstra will also incur operational costs (OpEx) in the form of people (FTEs) in managing notifications and advising government stakeholders. Telstra will also incur costs due to a significant increase in the number of *network outage complaints* that our agents will be required to manage under the CCH Standard. Based on the current drafting of the CCH Standard, and an expectation that 5% of customers will make contact during a network outage, we will see complaint volumes increase by approximately [C-I-C Begins] [C-I-C ends]. 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

²¹ [C-I-C]



business in the [C-I-C Begins] [C-I-C Ends] Further information can be found in our submission on the CCH Standard.

Table 3 below outlines the staffing cost to meet the obligations of the CCO Standard. Unlike the capital cost to build an automated solution (for the parts that can be automated), operational costs scale linearly with the number of notifications. A lower threshold for the number of end-users affected by the outage will reduce these costs in direct proportion with the number of notifications.

[C-I-C Begins]

[C-I-C Ends]

Table 3: Operational costs (per annum).

We hasten to add that we expect the CCH Standard to also drive significant operational costs into our business. The scale of that cost is proportional to the number of end users who are notified, and as a result of the notification, place a report (i.e., a service outage report) into Telstra about the outage, which is automatically reclassified as a complaint if the requirements of section 17B(1) are met under the current drafting of the CCH Standard (section 17B(3)). More detail about these costs can be found in our submission on the CCH Standard.

As a carrier, we are also concerned about the burden on our CSPs, including Belong and MVNO partners, to implement the obligations of the CCO Standard. For example, Belong use a manual process for customer notification, and a significant increase in the number of customer notifications directly drives an increase in cost. The manual customer notification is largely agnostic to the population size, as details of affected end users will be supplied to Belong by Telstra (the carrier). However, each (manual) notification requires curation and compilation, and so the impact is directly proportional to both the number of notifications and to the aggregate population notified (because of inbound inquiries being classified as complaints, as covered in the previous paragraph). This “double impact” on scale is likely to be true for any MVNO partners who also have manual customer notification processes.

We are concerned that the impact of the CCO Standard will disproportionately impact smaller players in the telecommunications market, and we recommend the ACMA proactively engage with MVNOs and CSPs on this issue, to understand the extent to which these obligations will have a greater impact on smaller players.

22 [C-I-C]

23 [C-I-C]



4. Artificial Intelligence

Telstra supports the removal of the wording banning the use of AI from section 16(3)(d),²⁴ adopting our position from our January 2025 submission. We also support the requirement that a customer should be able to speak to a person. Telstra believes it is in the best interests of end-users that carriers and CSPs are allowed to continue to use AI, including generative AI, in the triage and management of incoming voice calls from end-users as part of their existing infrastructure for inbound customer inquiries.

To provide some context to how Telstra is currently using AI to maximise the customer experience; we do not currently use generative AI to “talk” to customers for incoming voice call inquiries, although we cannot rule out the possibility of wanting to use this in the future as generative AI continues to mature. As with our use of AI Bots for messaging, generative AI is expected to be able to sense intent, and could be used to route a customer’s call to the most appropriate agent to assist the customer.

Telstra uses AI in the context of inbound customer inquiries in many ways including:

- **Quality Assurance Intelligence:** Reviewing historic customer contact interactions to identify if a customer needs support. It ensures that agents follow through with necessary actions helping to protect customers.
- **Ask Telstra:** AI is used to review call transcripts and questions to determine top questions asked by agents, this helps agents quickly and effectively find the knowledge articles to be able to resolve the customer enquiry.
- **Interaction Summarisation:** AI is used to summarise agent to customer conversation and provides agents at the end of the call exact notes around the call that agents can add into system notes. This saves time for agents having to write their own notes and improves consistency of notes for any further interactions they have with us; and finally,
- **Messaging:** AI Bots (i.e., robots) are used to assist customers in messaging channels by using large language models (LLM) to recognise intent and respond, always giving the option to fall out to a real agent if needed. This helps managing customer interactions more efficiently.

5. 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.

Telstra would like to highlight that the 30 June 2025 commencement date is a very tight timeframe to implement the CCO Standard for significant local outages. However, we will use our best endeavours to attempt to meet the Minister’s Direction of a commencement date of 30 June 2025, subject to the ACMA also narrowing the scope of the SLO definition as sought in this submission.

6. Additional/unnecessary requirements

Question 7: In relation to the draft amendments to the [CCO] Standard:

7a: Are there any additional matters aligned to the objectives that should be included but have not been?

The definition of a “major outage” in the CCO Standard currently refers to an unplanned adverse impact to “a telecommunications network”.²⁵ By contrast, the obligations in the ECSD typically apply to a carrier or CSP’s “controlled network” and/or “controlled facilities”. We recommend a consistent approach is

²⁴ The ACMA, 2025, s12B, p9, *Draft Amendments - Telecommunications (Customer Communications for Outages) Industry Standard 2024*, available at <https://www.acma.gov.au/consultations/2025-02/improving-customer-communications-outages>

²⁵ Ibid. s5, p3.



taken within the Draft Instrument, in the remainder of the ECSD and in the CCO Standard (i.e. all instruments to refer to controlled networks and controlled facilities). We have reflected this (in the definitions of MO and SLO) in our mark-up of the draft Amendment Instrument. We note that corresponding changes should be made throughout the CCO Standard, where applicable.

7b: Are there any matters that have been included for which alternative arrangements should be considered?

“Fully rectified” versus “service restored”: We are concerned that continuing notifications to end users once every 24 hours²⁶ until a service is fully rectified will result in notification fatigue. We interpret “fully rectified” as meaning the equipment *originally experiencing the outage* is replaced or repaired. In the case of a natural disaster (bushfire, flood, etc) that damages major infrastructure (e.g., 50m lattice tower for a mobile base station), inclusive of planning approvals, construction, etc, this can take over 6 months or even a year. Naturally, we will deploy temporary facilities (e.g., a cell-on-wheels) to restore the customers’ “services”, but the outage is not fully rectified until the original infrastructure is replaced/repaired/restored.

We recommend the ACMA should replace “fully rectified” with “restored” in section 14(2) and remove “fully rectified” from section 15(2), as shown below. We have also reflected this in our mark-up of the draft amendment instrument. We propose that corresponding changes be made throughout the CCO Standard, as appropriate.

14(2) Until a major outage or a significant local outage is ~~fully rectified~~ restored, the carrier or carriage service provider must provide updates about the outage, at the times specified in subsection (3) and containing the information specified in subsection (4), to the following persons:

15(2) As soon as practicable after a carrier or carriage service provider considers that all services affected by a major outage or a significant local outage have been restored ~~or fully rectified~~, the carrier or carriage service provider must notify, and communicate to, the following persons about the ~~rectification or~~ restoration:

We note there are six other references to “rectify” or “rectification” throughout the proposed CCO Standard. We have amended those references in our markup of the draft Amendment Instrument but have not replicated them here.

Notify end-users wishing to make a complaint of options after an outage is restored. Subsections 17D(3)(c) and 17D(4) of the proposed changes to the CCH Standard include obligations on CSPs to take steps to inform end-users of the steps they should take in the event they are not satisfied following restoration of the affected services. We support the ACMA’s intention to ensure end-users are informed of the appropriate options and steps. However, we consider this notification should be part of the process under the CCO Standard in relation to the resolution of the MO or SLO. In other words, the obligation should be captured in the CCO Standard, not in the CCH Standard.

²⁶ Telecommunications (Customer Communications for Outages Industry Standard) 2024, section 14(3)(b)(ii) but “fully rectified” is also applicable for section 15. Available at: <https://www.legislation.gov.au/F2024L01447/asmade/text>



We propose the following subsection is added to the CCO Standard, with the corresponding removal of subsections 17D(3)(c) and 17D(4) from the CCH Standard.

15(4) A notification to an end-user under subsection (2)(b) must also include details on how the end-user can raise a complaint, where the end-user is not satisfied following restoration of the affected services.



2. Telstra proposals for additional changes to the CCO Standard

We have attached a marked-up copy of the draft Amendment Instrument, with our proposed changes to the CCO Standard.