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The Manager  
National Interests Section  
Australian Communications and Media Authority  
Via email: [national.interests@acma.gov.au](mailto:national.interests@acma.gov.au).

**Aussie Broadband Limited**  
PO Box 3351  
Gippsland Mail Centre  
Victoria 3841  
P 1300 880 905  
E [info@aussiebroadband.com.au](mailto:info@aussiebroadband.com.au)

[aussiebroadband.com.au](http://aussiebroadband.com.au)

## **Re Proposed Amendments to the Customer Communications for Outages Standard**

Aussie Broadband Limited (Aussie Broadband) welcomes the opportunity to review and provide feedback on the proposed amendments to the *Telecommunications (Customer Communications for Outages) Industry Standard 2024* (the Standard). As a telecommunications provider, we recognise the critical importance of maintaining clear and timely communication with our customers during service outages. This commitment has been a cornerstone of our operations throughout our history.

Aussie Broadband takes great pride in proactively notifying customers of outages affecting their services, irrespective of the outage size, geographic location, or whether it was planned. This practice ensures that all customers are kept informed and can make necessary arrangements during service disruptions.

### **Definition of significant local outage**

The affected geography is defined by the Australian Statistical Geography Standard (ASGS), which outlines applicability to non-metropolitan areas. We believe that the 'regional or remote Australia' definition should be adjusted to only include outer regional, remote and very remote areas. Many inner-regional areas, such as Geelong, Wollongong, or Bendigo, are large municipalities with multiple networks available. Including inner-regional areas does not fit with the aim of the amended instrument, which is to ensure connectivity and communications for end-users in locations where alternative networks are not available.

In preparation for our feedback, we reviewed the Australian Bureau of Statistics (ABS) data and the ASGS to gain a better understanding of the proposed requirements. We found that the data for remoteness is difficult to locate and aggregate on an individual postcode/town/region level. During an outage, we envisage issues around identifying a geographical location's category. With this in mind, and the ACMA's objective that it be "clear and easy to apply in a short timeframe by carriers and carriage service providers who are also trying to diagnose and resolve the service outage", we would suggest that some more workable and user-friendly data be provided by the ABS/ASGS. This could be in the form of a simpler look-up function for geographical areas that CSPs can rely on and refer to, to take the guesswork out of needing to identify remoteness in the pressurised environment of a significant outage.

Further, Aussie Broadband believes the number of affected services in operation should be increased from 1,000 to 10,000 in the definition. The proposed number is small enough that almost any outage of any scale will require additional resources to assess whether it is suspected that the number could reach 1,000. We believe that 10,000 better aligns with a local outage of significance.

Finally, as mentioned above, one of the key considerations regarding the definition of local significant outages speaks to the "availability (or lack thereof) of alternative telecommunications networks." Aussie Broadband would raise, then, that if these end-users do not have alternative modes of connectivity available to them, and are being affected by an outage, then a notification delivered via the network that is currently experiencing an outage is unlikely to reach the end-user while the outage is ongoing in any case.

### **Definition of services in operation**

Aussie Broadband proposes that the definition of 'services in operation' be amended to refocus on connectivity to critical carriage services, such as voice, mobile data, and broadband. This ensures that end-users remain connected to key sources of information and the emergency call service. We believe that this is the intention of the Standard, however the current definition may capture outages for other services such as voicemail or streaming services – we suggest that these services should be excluded as they are not necessary for safety or connectivity.

### **Requirement to notify when an outage is ‘fully rectified’**

The Standard sets out actions required to be taken by carriers and CSPs when an outage is ‘fully rectified’. We propose that this wording is somewhat ambiguous; an end-user’s service may be restored well before the source of an outage is technically fully rectified. Alternative arrangements or technology can be used to restore a service to an end-user, so it appears to a user that a service is up and running again, while in reality the infrastructure may still be damaged or require replacement. In the case of physical infrastructure in particular, ‘fully rectifying’ an incident could take months. We believe that the intention of the Standard is not to require CSPs to continue notifying an end-user of the status of the outage for that period of time, but as it is currently drafted, it could be interpreted as such. We suggest that ‘fully rectified’ be amended to ‘a service being restored’.

### **Natural disasters**

While we did not raise this concern in our earlier comments on this Standard, it has come to our attention that the definition of a natural disaster poses some issues, particularly around the condition that it ‘requires a significant and coordinated response’. Our understanding now is that the ACMA may consider that an extreme weather event may only meet the threshold of a natural disaster for the purposes of the Standard, if it is declared as such by a government body and therefore invites a large-scale ‘coordinated response’, such as that seen in the recent case of Tropical Cyclone Alfred.

However, we would argue that an event on a much smaller scale, such as extreme storms causing flash flooding in a localised area, leading to a significant local outage, would cause widespread disruption to that community and require a significant and coordinated response from emergency services including the SES. Thus, the definition as it is currently drafted poses some problems – what do we consider to be ‘significant and coordinated’, and how would a CSP even know at the time of the outage about whether emergency services are coordinating to respond to it? How widespread should ‘widespread disruption to a community’ be for it to meet the threshold? Aussie Broadband raises this as we would like the definition clarified to reduce ambiguity around the conditions that must be met to be considered a natural disaster. This could be achieved by aligning the definition (or using a similar approach) to other existing instruments, such as the *Telecommunications (Customer Service Guarantee) Standard 2023*, which sets out exactly what weather events would be considered ‘extreme weather events’ in Schedule 3 of the instrument.

### **Artificial intelligence**

We thank ACMA for considering our feedback with regard to the use of Artificial Intelligence to support and triage customer queries. We welcome the removal of restrictions on Artificial Intelligence during both major and significant local outages, and believe this is beneficial to our ability to provide timely support and information to our customers.

### **Conclusion**

We urge the ACMA to reconsider some of the proposed amendments to ensure they are practical, efficient, and truly beneficial for end-users. We would also request that the ACMA truly consider smaller providers and wholesale partners when considering the requirements of this Standard; the feedback that we have received from these smaller providers indicates that the requirements in the Standard are overly burdensome and do not take into account the resourcing and system capacity of those smaller CSPs. Small CSPs remain an important part of the competitive telecommunications market in Australia, and we recognise that the regulatory burden on them is only increasing.

Aussie Broadband remains committed to maintaining transparent and effective communication with our customers during outages and look forward to working collaboratively to achieve this goal.

Warm regards,



Libby Hay  
General Manager – Corporate and Regulatory Affairs