

A close-up photograph of a person's hand holding a silver smartphone. The hand is positioned in the upper right quadrant of the image. The background is a dark blue, textured fabric, possibly a shirt. The lighting is soft, highlighting the contours of the hand and the phone.

Changing the Complaints Record Keeping Rules Consultation Paper

Australian Communications and
Media Authority

8th August 2025

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 Changing Complaints Record Keeping Rules Consultation Paper.

This submission sets out ACCAN's recommendations to expand complaints handling record keeping requirements. ACCAN's recommendations aim to strengthen the complaints reporting framework in the interest of consumers, informed by more detailed and structured reporting by entities and facilitating the identification of systemic issues. These measures will support stronger regulatory oversight, greater accountability from service providers, and a clearer understanding of the challenges consumers face.

Recommendations

ACCAN proposes that the ACMA expand requirements beyond the current proposed changes to record keeping rules in relation to complaints, to improve complaints monitoring and regulatory oversight. ACCAN recommends targeted enhancements to the proposed Complaints Record Keeping Rules with a focus on standardised classification, greater transparency and expanding reporting requirements to enable better detection of systemic issues.

This submission recommends the Australian Communications and Media Authority:

1. Establish a standardised complaint classification framework:
Develop and mandate a uniform complaints classification system to ensure consistency in reporting across the telecommunications sector. The ACMA should provide detailed industry guidance to support accurate categorisation and improve data integrity.
2. Improve transparency and facilitate the identification of systemic issues:
Require service providers to publicly disclose their top three complaint categories to enhance consumer awareness and support informed decision-making. Strengthen regulatory mechanisms to prevent broad or inconsistent classifications from masking underlying systemic concerns.
3. Mandate the reporting of systemic issues and remedial actions:
Introduce a requirement for providers to identify and report complaints indicative of systemic issues, including the measures undertaken to resolve them. This reporting should be integrated into existing regulatory data submissions to enable ongoing oversight.
4. Disaggregate complaint data by consumer type:
Require the reporting of complaint data to be disaggregated by consumer type, distinguishing between individual and small business customers. This will enable more targeted regulatory responses and better address group-specific challenges.
5. Support improved reporting of network outage complaints
Require the inclusion of network outage complaints as a distinct complaint category, with clear and consistent definitions. This will improve data quality, transparency, and regulatory oversight of service reliability issues

Contents

About This Submission2

Recommendations3

Contents4

1. Our recommendations5

2. Areas of Support5

3. Overarching concerns6

4. Conclusion7



ACCAN is the peak national consumer organisation advocating trusted, accessible, inclusive, affordable and available communications and digital services.

1. Our recommendations

The ACMA's proposed reforms introduce necessary changes to address additional reporting on service outages. ACCAN considers that the ACMA should take the opportunity to also make enhancements that will add more consistency in complaint classification and greater transparency across the sector. These improvements will support the ACMA's capacity to identify emerging trends, assess recurring problems, and exercise effective regulatory oversight.

ACCAN considers that there is scope to incorporate clearer industry guidance, standardised complaint categorisation, and publication of detailed complaint data. These measures will help improve the quality of complaints information, enhancing provider accountability, and ensuring the concerns of all consumers, including small businesses, are fully understood and addressed.

2. Areas of Support

2.1. Support for inclusion of Network Outage Complaints (Rule 9A)

ACCAN supports the inclusion of network outage complaints as a specific requirement under the record-keeping rules. Given the distinct nature of network outages and their significant impact on consumers, it is appropriate that such complaints be recorded and monitored separately. This will ensure that the ACMA can effectively assess service reliability issues and respond to patterns of consumer harm arising from outages.

2.2. Support for specific reporting requirements under Rule 9A(3)

ACCAN strongly supports the introduction of detailed reporting metrics for network outage complaints, including:

- The total number of network outage complaints.
- The number of such complaints referred to the TIO.
- The average number of days taken to resolve each network outage complaint.
- The number of network outages giving rise to these complaints.

These reporting requirements will significantly improve visibility into the extent and management of outage-related complaints, enabling better oversight and facilitating proactive responses to systemic issues.

2.3. Support for requiring "Network Outage Complaint" as a defined complaint category

ACCAN supports the requirement that Communications Service Providers (CSPs) must include "network outage complaint" as a distinct complaint category. This will ensure that these complaints are not captured under broader categories such as "faults" or "technical issues," which can obscure the prevalence of outage-related problems and impede the identification of service performance concerns.

2.4. Support for alignment of definitions across instruments

ACCAN supports the continued alignment of terminology and definitions between the revised Record-Keeping Rules and the *Telecommunications (Consumer Complaints Handling) Industry Standard 2018*. Consistent use of definitions—particularly for terms such as “complaint” and “network outage complaint”—will reduce ambiguity, improve compliance, and support the collection of meaningful and reliable data.

2.5. Support for the definition of “Network Outage Complaint” and clarification of complaint vs information request

ACCAN supports the definition of a “network outage complaint” as proposed and agrees with the distinction made between a complaint and a request for information. This distinction is important to ensure the integrity of complaint reporting, allowing for accurate data collection that reflects genuine consumer dissatisfaction or service issues.

3. Overarching concerns

3.1. Lack of a standardised complaint classification

Although providers report their top three complaint types, the absence of a standardised classification framework results in inconsistent and overly broad categorisations. For example, reporting often focuses on categories such as “*connection, faults, speed, billing, customer service and sales*” (ACMA,2025), can fail to adequately capture a wide range of potential complaint issues, including dropouts, data breaches, contract disputes and complaints around lack of accessibility. This limits data comparability across providers, hinders the identification of systemic issues such as misleading sales practices or billing errors, and diminishes the effectiveness of regulatory oversight and consumer protection.

3.2. ACMA should provide complaint issue classification guidelines

Current legislation requires providers to establish internal systems for categorising complaints by issue; however, there is little guidance or prescription about how best to achieve this. Industry would benefit from having a clear framework about complaint issue categorisation such that CSPs are classifying and reporting complaint issues in a consistent manner. We see a role for the ACMA to provide guidance that will facilitate this.

3.3. Publish top 3 complaint issues per provider

The ACMA should publish each provider’s top three complaint issues along with the total number of complaints for each. This will improve transparency and help consumers make informed decisions when choosing providers.

3.4. Strengthening the identification of systemic issues

To enhance regulatory oversight, the ACMA should introduce additional reporting requirements focused on identifying potential systemic issues. CSPs should be required to report complaints that may indicate systemic problems, along with the steps taken to address them. This information should be incorporated into the ACMA's quarterly complaints data reporting to improve visibility into recurring issues and support timely, targeted regulatory responses.

3.5. Inclusion of complaint data by consumer type

The ACMA should report the number of complaints received from both small businesses and individual consumers. This distinction will facilitate the identification of key issues affecting each group and highlight any systemic problems disproportionately impacting small businesses.

3.6. Enhanced reporting of service outages:

Reporting requirements related to network outages should be expanded to include comprehensive details such as the cause of the outage, its duration, and the measures taken to resolve the issue.

3.7. Tracking escalation of network outage complaints

Reporting should capture the number of customers dissatisfied with the initial resolution of network outage complaints who subsequently escalate to a formal complaint. ACCAN supports expanding network outage reporting to include tracking these escalations and establishing a clear process for handling complaints that remain unresolved through the default channels.

4. Conclusion

ACCAN welcomes the ACMA's proposed changes to enhance complaints record-keeping obligations and supports the inclusion of detailed reporting on network outage complaints as a significant step toward improving regulatory oversight and accountability. These changes will help provide greater visibility into how outage related complaints are managed and resolved, ultimately benefiting consumers.

We have suggested further improvements to ensure the Supports the delivery of comprehensive consumer protections. In particular, the introduction of standardised complaint classification, clear industry guidance on complaint categorisation, and more detailed public reporting would enhance data comparability, transparency, and the identification of systemic issues across all complaint types.

ACCAN encourages the ACMA to adopt these additional measures to ensure that the final rules deliver a more effective, transparent, and consumer-focused complaints monitoring framework.

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.



www.accan.org.au

info@accan.org.au