



Submission in response to ACMA  
consultation on

**Telecommunications  
(Consumer Complaints)  
Record-Keeping Rules 2018**

Public Version

6 August 2025

## INTRODUCTION

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1. Optus welcomes the opportunity to provide feedback on the Australian Communications and Media Authority's (**ACMA**) consultation on proposed amendments to the *Telecommunications (Consumer Complaints) Record-Keeping Rules 2018 (RKR<sup>s</sup>)*.
2. Optus is a qualifying service provider under the RKR<sup>s</sup> and so must comply with the rules to record and report data on complaints metrics to the ACMA. As such, Optus is currently required to report to the ACMA:
  - (a) Breakdowns of service types (mobile, NBN, non-NBN fixed broadband)
  - (b) Number of consumer complaints we receive per quarter
  - (c) Average timeframe to resolve complaints
  - (d) Days to resolve 80% of complaints
  - (e) Our top three complaint drivers
3. We note that since December 2024, the ACMA has published reported complaints data on its website, ranking each service providers (with at least 30,000 services) by complaints-handling performance and broken down by service type.
4. We also note that these proposed changes to the RKR<sup>s</sup> will apply from the Jan-March 2026 reporting quarter; allowing service providers one quarter to prepare for the amendments which are expected to be finalised by the end of September 2025.
5. Optus looks forward to further consultation and guidance from the ACMA on record keeping and reporting related to complaints handling. Given the publication of this data on the ACMA website, we support further efforts to ensure that consistent and meaningful data is available to consumers.

## COMMENTS ON ACMA PROPOSED CHANGES

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### Separate reporting of network outage complaints

6. Optus supports separate reporting of network outage complaints. While it has only been a short time since new regulations on handling network outage complaints took effect, our experience is that we are seeing negligible numbers of complaints about outages.
7. We believe the low level of network outage complaints may be due to the numerous messages and updates consumers affected by qualifying outages receive under the Customer Communications for Outages Standard. We expect that many complaints related to outages will be from customers seeking to opt out of the mandatory communications. We are already seeing such requests/complaints coming from customers who have received these mandatory notifications.
8. We also acknowledge that in the event of an extensive (either in geographic impact or duration) outage, we will likely see more network outage complaints. In such an event, we would prefer to report separately to avoid any associated spike affecting general complaint handling metrics. We agree with the ACMA's view that it is preferable to separate the analysis of the two groups of complaints.

### New Definitions

*Default resolution; Network outage; Network outage compliant; Network outage complaints-handling process*

9. Optus has no objection to these new definitions, noting that they match the definitions in the Complaints Handling Standard.

### Amended Definitions

*Complaint*

10. Optus suggests that this definition should explicitly exclude a service outage report. We note that the Complaints Handling Standard contains a note under the definition to this effect and suggest that the note should be replicated in the RKR's.

*Consumer*

11. Optus has no objection to updating this definition to align with the higher thresholds (i.e. \$40,000 annual spend) contained in similar instruments, for example, the draft TCP Code, as submitted to the ACMA for registration in May 2025 and the Financial Hardship Standard (2024).

*Representative; Advocate; Authorised Representative*

12. Optus has no objection to these amended definitions and appreciates that these definitions match those in the Complaints Handling Standard.