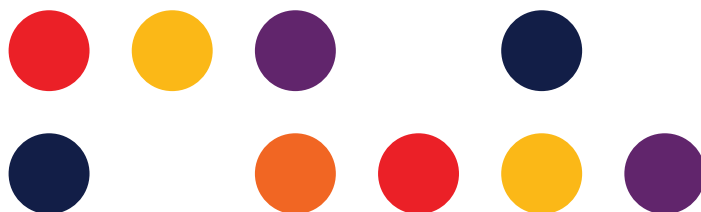


Submission - Changing the complaints record-keeping rules

ACMA

July 30, 2025

Public



Submission

TPG Telecom welcomes the opportunity to provide a submission on the proposed amendments to the *Telecommunications (Consumer Complaints) Record-Keeping Rules 2018 (the RKR)*s. We support the Australian Communications and Media Authority's (ACMA) proposed changes to the RKR, particularly in relation to network outages.

About TPG Telecom

TPG Telecom Limited is a leading challenger full-service telecommunications provider and own and operate a nationwide mobile network that is connecting Australia for the better. We operate leading mobile and internet brands including Vodafone, TPG, iiNet, Lebara and felix mobile.

Issues for comment

TPG Telecom acknowledges the importance of ensuring that complaints arising from major outages and significant local outages are appropriately prioritised and recorded. We agree that the current framework must be updated to provide consistency between the *Telecommunications (Consumer Complaints Handling) Industry Standard (Complaints Handling Standard)* and the RKR.

We support the introduction of separate reporting obligations for network outage complaints. This distinction is critical - not only due to the legal difference in the complaint types under the Complaints Handling Standard – but due to the fact that such complaints stem from a common underlying cause and at a practical level differ significantly from individualised service issues.

By requiring carriage service providers (CSPs) to report network outage complaints separately, both CSPs and the ACMA will be better positioned to analyse trends, monitor compliance, and identify systemic issues. This will also allow for continuity in the analysis of non-outage complaint data and provide clearer insights into the impact of outages on customer experience.

TPG Telecom supports the proposed quarterly reporting requirements for qualifying CSPs, including:

- Total number of network outage complaints received directly.
- Total number of network outage complaints referred by the Telecommunications Industry Ombudsman (TIO).
- Average time taken to implement default resolutions.
- Number of outages resulting in one or more complaints.

As with the original consultation by the ACMA prior to public publication of the results of the data sets, we encourage the ACMA to engage with industry (including TPG Telecom) prior to reporting publicly on any specific metric. Context is essential to analysis of raw data, and fulsome engagement about the background of a data set will support the ACMA in its interpretation of the data submitted quarterly by CSPs.

In particular, outage complaint data reported by CSPs holds limited value unless contextualised by the service arrangements with underlying carrier networks. CSPs may rely on multiple underlying Carrier networks (for mobile or fixed services). While the Complaints Handling Standard and RKR can distinguish faults related to the NBN, it stops short of extending this logic to other broadband, fixed voice, and mobile service suppliers. Consequently, an assessment framework that focuses solely on CSP-reported outage data risks misidentifying the source of network issues. For instance, in our Multi-

Operator Core Network (MOCN) environment, if a TPG Telecom CSP reports a number of outage complaints it may be incorrectly assumed that these faults originate within the Vodafone mobile network - when in fact they may occur due to issues with the Optus mobile network. Without access to data to provide this context, the potential misattribution of root cause issues undermines the accuracy of analysis conducted by the ACMA.

TPG Telecom appreciates the proposed commencement date of the January to March 2026 reporting quarter. This timeline provides sufficient lead time to update internal systems and processes to ensure compliance with the new requirements. When the ACMA acknowledge and provide time for process and technical timeframes, it supports effective change processes, supporting compliance within the industry.