



# Telstra Response: Changing the complaints record-keeping rules

## Public submission

5 August 2025



## 1. Introduction

Telstra welcomes the opportunity to respond to the ACMA's proposed changes to the Telecommunications (Complaints Record-Keeping Rules 2018) (RKR), particularly regarding the introduction of Network Outage Complaints (NOC). We support the ACMA's use of complaints handling data to analyse trends and identify areas of concern across the industry and at the Carriage Service Provider (CSP) level. However, this submission outlines several potential challenges associated with implementing the new RKR. We consider that the complexity and scope of the new requirements relating to NOCs will present practical difficulties for industry participants to deliver these expectations in a clear and uniform way. The proposed changes to the RKR also raises issues about data accuracy and regulatory consistency.

NOCs have a lower threshold than other complaint types as any inquiry about a network outage<sup>1</sup>, even if the customer is not expressing dissatisfaction, is treated as a NOC. So, expanding the RKRs to capture NOCs risks them misrepresenting customer sentiment, with potential negative reputational impacts for the industry.

The absence of objective criteria and varying IT capabilities across CSPs may also lead to an inconsistent application of the RKRs, undermining the reliability and comparability of the reported data, particularly when we consider the short implementation time frames that CSPs were given to implement the new Standard.<sup>2</sup> We offer recommendations for ACMA's consideration to help address these issues.

Furthermore, we do not consider the ACMA is legislatively required to amend the RKRs to specifically include NOCs in response to changes in the Standard. The existing framework already requires CSPs to capture and manage this information. However, given the risks of NOC data being misinterpreted by the public, as discussed below, Telstra does not consider this information should be included in public reporting such as the ACMA Complaint Handling Performance League Tables or other aggregate reporting.<sup>3</sup> While the consultation does not explicitly specify whether this is being contemplated by the ACMA, if the ACMA is inclined to include NOC information in public reporting then it must be made distinct from normal complaint data and accompanied by a clear explanation of the difference between NOCs and other types of complaints. Confidential voluntary reporting of information relating to NOCs, including information regarding default resolution timeframes may better support transparency to the ACMA without compromising data integrity and minimise any adverse effects.

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<sup>1</sup> network outage as defined in the Standard

<sup>2</sup> Telecommunications (Consumer Complaints Handling) Industry Standard Amendment 2025 (No. 1)

<sup>3</sup> [Telco complaints-handling performance | ACMA](#)



## 2. Risk of misrepresenting customer sentiment through inflated complaint reporting

The proposed amendments to the RKR risk inflating NOC volumes due to the broad and subjective definition of NOCs introduced under the Standard. Unlike traditional complaints, a NOC does not require any expression of dissatisfaction from the consumer. Instead, it is triggered solely by CSP's suspicion of a network outage and its potential impact on the consumer, as outlined in Section 17B(1)(a)-(b).

In our view, this significantly lowers the threshold for what constitutes a complaint and introduces ambiguity into the reporting process. This ambiguity creates operational challenges, particularly for frontline agents who must determine whether a NOC is to be recorded. For example, under subsection 17B(3) and 17B(4), any contact from a customer that a CSP suspects is associated with an outage must be recorded as a NOC unless the outage is predominantly caused by a natural disaster. This means that if a customer contacts their CSP to report slow speeds or intermittent connectivity, and the CSP suspects the issue may be due to an NBN network outage<sup>4</sup>—even without confirmation—the interaction must be logged as a NOC. This applies even when the customer is simply seeking information and has not expressed dissatisfaction, which is inconsistent with the traditional understanding of a complaint.

This approach artificially inflates complaint volumes and risks misrepresenting customer sentiment. During large-scale network outages, hundreds of routine service queries could be recorded as complaints, despite no fault lying with the CSP and no intent by the customer to lodge a complaint. Telstra has previously raised concerns that this approach conflates service queries with genuine complaints, undermining the accuracy and integrity of complaint data.<sup>5</sup> Even though the ACMA proposes that the reporting regarding NOCs will be separate from existing reporting about other kinds of complaints<sup>6</sup>, if these volumes are publicly reported, they may falsely suggest a surge in dissatisfaction, potentially damaging a CSP or industry's general reputation and misleading consumers and regulators. For example, Telstra will take a reputation hit every time there is an NBN outage merely because we are the biggest NBN RSP.

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<sup>4</sup> network outage as defined in the Standard

<sup>5</sup> Telstra Group Limited, Consultation Response: *Proposed Amendments to the Telecommunications (Consumer Complaints Handling) Industry Standard*, 19 March 2025

<sup>6</sup> Noting the exception that the NOC volumes would need to be considered when reporting the top 2 types of complaints by volume under paragraph 9(1)(e).



### 3. Possible inconsistent application across CSPs

The short time frames in which CSPs have had to implement the revised Standard has already attracted significant comment from CSPs. In the absence of sufficient time to redesign systems, CSPs are likely to implement a wide array of interim solutions to meet the new requirements. These solutions may vary widely depending on each provider's systems, resources, and operational models, and could result in either over or under reporting of NOCs.

This divergence in approach will potentially undermine the consistency and comparability of data collected under the revised Standard and RKR, which the ACMA relies on for regulatory oversight. Without clear enforceable guidance and oversight from the ACMA, the resulting data will be unreliable.

### 4. Recommendations

Given the concerns outlined in the two previous sections, we respectfully request that the ACMA consider adopting a more flexible and proportionate approach to the proposed RKR for NOCs. Specifically, we ask that the ACMA:

1. Provide clearer guidance on the interpretation and application of key definitions in the output reporting—particularly in relation to NOCs—to support consistent implementation across CSPs.
2. Allow for transitional compliance arrangements that recognise the complexity of system changes and third-party dependencies that may need to be addressed to meet the enhanced compliance requirements.
3. Consider alternative reporting models (such as keeping the NOC reporting confidential to the regulator) where limitations prevent accurate or meaningful data capture.

These adjustments would help ensure that the revised RKRs deliver the policy objectives or distorting the quality and comparability of reported data.