

# Submission to ACMA Consultation – Proposed Extension of the Telecommunications (Customer Service Guarantee) Standard 2023 and Record-Keeping Rules 2023

## BIRRR SUBMISSION

Better Internet for Rural, Regional & Remote Australia  
935 Malden Road  
Alpha QLD 4724  
[team@birrraus.com](mailto:team@birrraus.com)

Submission Date: 14th June, 2026

Prepared by: [REDACTED]

This submission was prepared in good faith by a voluntary team. Please address any queries to BIRRR at [team@birrraus.com](mailto:team@birrraus.com)



Better Internet for Rural, Regional and Remote Australia (BIRRR) welcomes the opportunity to provide feedback on the proposed extension of the Telecommunications (Customer Service Guarantee) Standard 2023 and Telecommunications (Customer Service Guarantee) Record-Keeping Rules 2023.

BIRRR acknowledges the ongoing importance of Customer Service Guarantee (CSG) protections, particularly for rural, regional and remote (RRR) consumers who continue to rely heavily on timely connection, fault rectification and appointment obligations for essential voice services.

The existing instruments establish important obligations relating to service connection timeframes, fault rectification periods, appointment keeping, exemptions, record-keeping and compliance reporting. BIRRR supports the continuation of these consumer protections.

However, BIRRR does not support a further three-year extension of the current framework without broader reform, stronger oversight and greater accountability occurring alongside the significant telecommunications migrations currently underway across regional Australia.

Regional consumers are being transitioned away from legacy, network-powered services toward more complex and power-dependent technologies, including fixed wireless, VoIP, satellite and mobile-based voice solutions. In addition, large-scale industry changes and network transitions — including the 3G shutdown, copper withdrawal and nbn's Sky Muster to nbn LEO migration — are occurring across many parts of rural and remote Australia.

BIRRR is increasingly concerned that repeated extensions of a legacy consumer protection framework are occurring while consumers continue to carry the operational, financial and resilience risks associated with these major technology transitions.

The current framework was largely developed around traditional fixed-line service delivery models and does not adequately reflect the realities, limitations, redundancy and resilience challenges associated with newer telecommunications technologies now relied upon in rural and remote Australia.

In particular, BIRRR remains concerned that many replacement technologies now rely on customer-powered equipment and local power availability, creating additional risks during extended outages, natural disasters and emergency situations where appropriate consumer safeguards, resilience measures and backup arrangements are not in place. These issues are especially significant in rural and remote areas where outages may be prolonged, backup power options limited and alternative communications pathways unavailable.

BIRRR also notes that the existing exemption provisions to CSG standards increasingly interact with large-scale weather events, disaster impacts and network disruptions occurring across regional Australia. This further highlights the need to ensure consumer protection arrangements remain fit-for-purpose in increasingly complex and weather-dependent telecommunications environments.

While BIRRR acknowledges the importance of avoiding a regulatory gap by extending the instruments in the short term, it is our view that repeated "review and extend" approaches risk delaying long-overdue reform of the broader Universal Service Obligation (USO) and CSG framework.

Therefore, BIRRR considers it inappropriate for the existing framework to simply be extended for a further three years without a clear commitment and timeframe for comprehensive, technology-neutral reform of telecommunications consumer protections.

BIRRR also considers that the existing Telecommunications (Customer Service Guarantee) Record-Keeping Rules 2023 should be reviewed to ensure they remain fit-for-purpose in modern

telecommunications environments. In particular, consideration should be given to whether existing reporting and record-keeping obligations adequately capture migration-related consumer impacts, prolonged outages, power dependency issues, service reliability concerns and repeated fault patterns experienced by rural and remote consumers. It is important that data granularity is not lost through national-level or overly aggregated reporting, as this can mask significant rural, remote and technology-specific service disparities and result in consumer lived experience not being accurately reflected in regulatory oversight or public reporting.

**BIRRR recommends that:**

- the proposed extension operate only as an interim measure while broader reform is undertaken;
- comprehensive review of the CSG and USO frameworks commence during the extension period and be led by the appointment of a dedicated working group or advisory panel that includes members with lived rural and remote experience;
- future reform include stronger consideration of resilience, redundancy and power dependency risks for consumers, including reliable access to Triple Zero services during outages and emergency situations;
- greater oversight and transparency be implemented regarding telecommunications migration outcomes for consumers;
- the Telecommunications (Customer Service Guarantee) Record-Keeping Rules 2023 be reviewed to improve transparency, data granularity and reporting regarding outages, migration impacts, fault rectification performance and rural and remote consumer outcomes and
- telecommunications consumer protections be modernised to better reflect contemporary service delivery technologies and contemporary rural and remote operating environments.

BIRRR refers to ACMA in its [March 2026 submission to the Department](#) regarding broader CSG and USO reform issues, including concerns relating to migration oversight, resilience, consumer protections and regional telecommunications barriers.

BIRRR appreciates the opportunity to provide feedback and would welcome further engagement as this work progresses.