

5 July 2023

Universal Services Branch
Department of Infrastructure, Transport, Regional Development,
Communications and the Arts
GPO Box 594
Canberra ACT 2601

By email to usb@communications.gov.au; Garth.Donovan@communications.gov.au

Dear Universal Services Branch

Draft Customer Service Guarantee Direction to the ACMA

Thank you for the opportunity to comment on the Department's draft *Telecommunications (Customer Service Guarantee) Direction 2023 (Direction)*.

We welcome the Direction to make new Customer Service Guarantee (CSG) instruments to rollover existing arrangements with minor amendments.

We support the Direction in its current form on the basis that further work to update the CSG remains a priority for the Minister's office. Our submission to the CSG Thematic Review in March 2023 details the areas of the CSG that we believe require updates.

Our office continues to see complaints from consumers who experience delays in connection or repair of their telecommunications services. It is important that consumer protections like the CSG are updated and strengthened to ensure they have the intended effect of supporting and providing incentives for reliable connectivity.

There is still a need for an updated CSG that aligns with contemporary views on essential telecommunications services.

We regularly handle complaints from consumers who experience delays in connection or repair of their telco services. Most recently, our Q3 FY23 report¹ shows that these issues continue to feature prominently in our top 10 complaint issues. For example, complaints involving:

- intermittent service or drop outs made up 10% of complaints for the quarter
- no phone or internet service made up 9% of complaints for the quarter
- delays establishing a service made up 6% of complaints for the quarter, and
- inadequate fault testing made up 6% of complaints for the quarter.

Compensation payable under the CSG scheme can motivate providers to complete the connection or repair of a consumer's service in a timely manner. It also gives providers an incentive to offer

¹ [Quarter 3 Complaints Report \(FY2022-2023\) | The Telecommunications Industry Ombudsman](#)

interim services while a connection or repair is unreasonably delayed, which can minimise the harms consumers experience when they are without services.

We look forward to the new CSG standard being finalised, and to working further with the Department on updating requirements and protections in the CSG.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Cynthia Gebert', with a long, sweeping horizontal flourish extending to the right.

Cynthia Gebert
Telecommunications Industry Ombudsman