

14 February 2025

Director, Digital Competition Unit
Market Conduct and Digital Division
The Treasury
Langton Crescent
PARKES ACT 2600
By email to digitalcompetition@treasury.gov.au

Dear Digital Competition Unit,

A new digital competition regime – Proposal Paper

Thank you for considering our feedback on Treasury's Proposal Paper outlining a new digital competition regime.

The Telecommunications Industry Ombudsman (TIO) supports reform to address consumer harm from anti-competitive conduct by digital platforms. We particularly support obligations on the sector to address potential unfair treatment of business users and lack of transparency as proposed by Treasury.

Competition reforms by themselves will not go far enough to prevent consumer harm or support trust and confidence in the digital economy. We strongly recommend Government pursue competition reforms alongside internal and external dispute resolution obligations for digital platforms, as recommended by the ACCC and the recent review of the *Online Safety Act 2021*.¹

We understand that work is progressing on internal dispute resolution arrangements for digital platforms.² It is vital that digital platform consumers also have access to an external dispute resolution scheme to support fair and reasonable outcomes if internal dispute resolution fails. With the Government's intention to require digital platforms join a designated Ombudsman scheme for scam-related complaints, now is the time to ensure that other consumer harms are also addressed through external dispute resolution.


As an independent umpire for the digital platform sector, an Ombudsman scheme would not only support individual consumer redress but have a strong role in investigating and reporting systemic issues (and potential breaches of the competition framework) to the

¹ Delia Rickard PSM, [Report of the Statutory Review of the Online Safety Act 2021](#) (2024)

² Treasury, [Government Response to ACCC Digital Platform Services Inquiry](#) (2023)

ACCC. Such a scheme would also provide vital insights to policy makers based on the complaints it receives.

The TIO has long supported the modernisation of its jurisdiction to include digital platform complaints.³ As the Ombudsman scheme for phone and internet complaints, it makes sense that our jurisdiction reflects how modern Australia communicates, not just traditional telecommunications services. We are keen to work with Government on how we can progress this important reform.

If you have any questions, please do not hesitate to contact Erin Dempsey, Policy and Regulatory Affairs Lead at the TIO, 

Yours sincerely,

Cynthia Gebert
Telecommunications Industry Ombudsman

³ TIO, [Submission to Treasury - digital platforms regulatory reform](#) (2022)