

14 March 2025

The Manager
National Interests Section
Australian Communications and Media Authority
PO 13112 Law Courts
Melbourne Victoria 8010

Dear ACMA,

TIO submission on improving customer communications for outages

Thank you for the opportunity to comment on the proposed amendments to the *Telecommunications (Customer Communications for Outages) Industry Standard 2024* (the **CCO Standard**). We are pleased to see the ACMA propose amendments to address the issues raised during the Department's *Review into the Optus Outage of 8 November 2023*, and the subsequent Recommendations resulting from the review.

The TIO regularly receives complaints about outages, including outages from consumers living in regional and remote Australia. Outage complaints can vary greatly in terms of their length and impact; ranging from relatively short outages that affect a large number of consumers, to localised outages affecting a smaller number of people for an extended period of weeks or months.

We are broadly supportive of the ACMA's initiatives to improve its regulations for both kinds of outages, as they help ensure that when an outage occurs, all consumers can receive consistent and accurate information about the outage from carriers, providers and other relevant stakeholders.

Our submission provides feedback on the topics of significant local outages and natural disasters. For further context and information on our concerns about outages, please also see our concurrent submission on the *Telecommunications (Customer Complaints Handling) Industry Standard 2018*.¹

1. The definition of a 'significant local outage' could use further refinements

We support the ACMA's proposed definition of a 'significant local outage', which lowers the threshold from the previously-proposed 50,000 services in operation to the newly-proposed 1,000 services in operation. This change will better serve the needs of Australians who experience outages in regional and remote towns. However, based on the complaints received by our office, the definition will still leave some remote and regional towns without the information or protections they need when an outage occurs.

Remote and regional towns rely on essential telecommunications services. When these services are not available, residents need access to accurate and timely information about what has occurred and when their services are likely to be restored. Despite these towns

¹ See here for the ACMA's consultation and submissions: [Changes to consumer complaints-handling rules | ACMA](#)

being small in population, the impact on their ability to work, study, access health and government services and respond to emergencies can be as great as it would be for a major outage. For some significant local outages the impact on individuals may be even greater than it would be in a major urban area, as those consumers will have less access to interim services and more restricted access to, for example, emergency services.

As we flagged in our October 2024 submission on the CCO Standard,² in the last twelve months we have received complaints from residents of towns in regional and remote Australia that have relatively small populations. When these residents contact their providers about a lack of service, they sometimes receive inconsistent information about the existence or causes of the outage, and they can experience lengthy delays in having that outage restored.

In some cases, these regional and remote towns have relatively small populations, and so a local outage affecting a whole town may fall short of the 1,000 services in operation threshold to be considered a significant local outage.

Case study: Outages in Morawa, WA may not be considered a significant local outage under the proposed definition

In July 2024, we received over 20 complaints from residents of Morawa, a regional town in Western Australia. These consumers told us the town's mobile coverage had either dropped out or became unreliable for the previous 1-2 months, and these outages were affecting all residents. Residents reported there were "entire days" where they did not have service, which disrupted businesses, prevented consumers from completing two-factor authentication for their accounts, and posed repeated disruption to their daily lives.

According to the 2021 Census data, Morawa has a population of just under 500 people. This means that, depending on how providers and carriers choose to interpret the term "distinct location" for the purposes of a significant local outage, the outages in Morawa would not enliven the proposed processes in the CCO Standard.

Although we acknowledge that carriers may experience difficulty when identifying potential outages in smaller regional areas, we encourage the ACMA to consider alternative lower thresholds for a significant local outage, to better capture the breadth of locations where such an outage may occur. For example, the definition of a significant local outage could be modified in a manner that reflects the definition of a major outage (e.g. where an outage is likely to affect all services in a distinct location in regional or remote Australia), or focused on all services within a given geographic radius. We also recommend the ACMA consults with regional representative groups to determine the most appropriate threshold for identifying a significant local outage.

Furthermore, we understand that outages in regional and remote towns can be subject to logistical issues and may take more time to diagnose and repair than outages in major urban areas. However, we do have concerns about the threshold for a significant local outage being as high as six hours, compared to the 60-minute threshold for a major outage.

One reading of this requirement is that an outage affecting a regional community for a five-hour window during trading hours is not 'significant' and does not require any broader

² [TIO submission to the ACMA's Consultation on the Proposed Telecommunications \(Customer Communications for Outages\) Industry Standard 2024 \(October 2024\)](#).

communication with affected residents, which is presumably not the intended consequence of these amendments. We recommend the ACMA consider whether a shorter timeframe would be feasible for significant local outages.

2. The ACMA should consider whether providers should actively contact end-users about outages caused by natural disasters

We support the proposed range of amendments to the CCO Standard, especially to the extent they help clarify carrier and providers obligations when a significant local outage or natural disaster occurs.

We note the amended rules require providers to contact end-users when they have been affected by a major or significant local outage, but exempt providers from doing so when the outage is predominantly caused by a natural disaster. As we outlined in our October 2024 submission on the CCO Standard,³ it may be critically important for consumers affected by natural disasters to have access to reliable information about the outage, and so we recommend the ACMA considers whether it is appropriate to maintain this exemption under the amended rules.

We look forward to seeing the outcomes of this consultation.

Yours sincerely,

Cynthia Gebert
Telecommunications Industry Ombudsman

³ [TIO submission to the ACMA's Consultation on the Proposed Telecommunications \(Customer Communications for Outages\) Industry Standard 2024](#) (October 2024).