

14 March 2025

The Acting Manager
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Australian Communications and Media Authority
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Dear ACMA,

TIO submission on the changes to consumer complaints-handling rules

Thank you for the opportunity to comment on the proposed amendments to the *Telecommunications (Consumer Complaints Handling) Industry Standard 2018* (the **Complaints Handling 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 information from their provider about the outage, and can make complaints about the outage without unnecessary barriers. We are also pleased that the ACMA has strengthened aspects of the Complaints Handling Standard more broadly by including new provisions that will improve the transparency, accessibility and efficiency of the regular complaints handling process.

Our submission also provides feedback and highlights several of our concerns about the efficacy of the proposed network outage process, and the potential barriers it creates for consumers.

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 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 *Telecommunications (Customer Communications for Outages) Standard 2024*¹ (the **Customer Communications for Outages Standard**), 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 process

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 protections in the Complaints Handling Standard nor the Customer Communications for Outages Standard.

Case study: Outages in Meeniyah, VIC may not be considered a significant local outage under the proposed process

In early February 2025, we received several complaints from residents of Meeniyah, a regional town in Victoria. These consumers reported they had been affected by a town-wide outage since around 29 January 2025. When residents reported these issues to their various providers, they said they were given conflicting information or told that no outage was present. The outage lasted until around 5 February 2025.

According to the 2021 Census data, Meeniyah has a population of just under 800 people. It is likely this outage would fall short of the 1,000 services in operation threshold and not enliven the protections of the proposed amendments, and so residents may continue to experience similar issues for future outages.

¹ [TIO submission to the ACMA's Consultation on the Proposed Telecommunications \(Customer Communications for Outages\) Industry Standard 2024 \(October 2024\)](#).

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 change in processes, which is presumably not the intended consequence of these amendments.

It is likely consumers will also see this longer threshold as giving preferential treatment to major urban areas over regional towns. As one consumer told us when describing a week-long planned outage in their regional town:

"Optus went out for 6 hours and there was a senate enquiry. [My provider] would never shut down a major centre like Townsville or Cairns for 6 days but because this is a small country town where nobody of importance lives, [my provider] is ok with this."

For these reasons, we recommend the ACMA consider whether a shorter timeframe would be feasible for significant local outages.

2. The complaints handling process should also cover outages caused by natural disasters

In our October 2024 submission on the Customer Communications for Outages Standard,² we said the information about outages provided under that Standard should also be provided when the outage is caused by a natural disaster, as it is critically important that communities affected by disasters have easy access to reliable information about the outage.

We take a similar view for the purposes of the Complaints Handling Standard and its proposed new process for handling network outage complaints. The new obligations require providers to take note of the consumer's contact, provide information about the outage, and focus on restoring the service as soon as practicable. In our view, it would not be overly onerous for providers to follow this same process if the outage was caused by a natural disaster. The alternative approach – that the consumer's contact is either turned away or treated as a regular complaint – appears to be at odds with the intended purpose of these amendments.

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

3. Network outage complaints should be given more of the protections of regular complaints

Question 2: Does the amended definition of 'complaint', combined with the new 'network outage complaint' definition, give effect to the direction's objective of ensuring consumers who contact their provider in relation to a network outage can attract the protections of the Complaints Handling Standard? If not, please explain why and describe any alternative and/or additional approaches that could be used to meet the objective

The amended definition of a complaint goes some way to achieving the goal that, when a consumer reports a network outage, this report is automatically treated as a complaint.

However, since these network outage complaints must be handled through a new network outage complaints handling process which is expressly isolated from the existing protections in the Complaints Handling Standard, we question whether the proposed new process fully realises that objective.

For example, when a consumer reports a service difficulty and the provider identifies that the consumer is likely to be affected by a network outage:

- none of the Standard's existing resolution timeframes or escalation pathways will apply (unless the consumer raises a subsequent complaint under the regular complaints handling process), and
- if a consumer is seeking a tailored resolution to the complaint while the complaint is still ongoing (such as when a consumer is frustrated with an outage and wants to exit their contract), the new process would require that consumer to raise a second complaint to discuss that outcome.

While this new process may work well for a simple outage with a simple resolution, if the outage is longer or the consumer's circumstances are more complex, this process may be less efficient and offer fewer protections than the existing process.

A simpler alternative may be to retain the process by which a 'service outage report' can be automatically considered to be a complaint, but to run that complaint through the regular complaints handling process, with some modifications to account for the expected restoration timeframes and the information that is available under the Customer Communications for Outages Standard.

4. The complaints process should be more flexible in situations where a carrier has not identified an outage

We have several concerns about how the proposed process will function when a consumer makes a service outage report to their provider, and the provider has not been aware of that outage through the operation of the Customer Communications for Outages Standard.

The proposed process allows that when a provider is unsure whether a network outage is present, the provider does not have to respond immediately, but can instead opt to contact the consumer back within 30 minutes of receiving the report (s.17B(2)(b)). This may mean the complaint is not acknowledged, considered, or handled at first contact. A preferable approach may be for the provider to treat the complaint under its regular complaints handling process until such time as it identifies that the consumer is likely to be affected by a network outage.

Additionally, the proposed amendments (and the proposed amendments to the Customer Communications for Outages Standard) do not appear to account for the possibility that a provider may identify a potential outage before the carrier has identified that outage. For

example, if several consumers in a regional town report to their provider “the whole town has lost all mobile service” over several days, it may be reasonable for the provider to suspect that a network outage is occurring (s.17B(1)(b) and that the consumer is likely to be affected by that network outage (s.17B(1)(c)), and so the provider could apply the network outage complaints process. However, if the provider’s carrier is not aware of the outage, or has not notified the provider that an outage is occurring (via s.8 of the Customer Communications for Outages Standard), this leaves the provider and consumer in a difficult position. The provider will be unable to give the consumer any relevant information about the outage and cannot close the complaint until they receive notification from the provider that the service has been restored.

Unless proactive obligations exist for the provider to contact their carrier, and for the carrier to act on that contact, the consumer will simply have to trust that the provider will report the outage to the carrier to resolve the outage.

5. Additional comments on when an outage is caused by a natural disaster

Question 3: Currently network outage complaints would not be raised if the outage is due to an unplanned adverse impact and the sole or predominant cause is a natural disaster. Should this exception be removed? If so, please explain why and how this could work in practice.

As we discussed in section 2 of this submission, we recommend that outages caused by natural disasters should not be treated differently for the purposes of the Complaints Handling Standard. From a consumer’s perspective, if their service goes down, the reasons for the outage may not substantively matter to them – they have a complaint and an expectation that the service will be restored. As with regular outages, it would be appropriate (and not overly onerous) for the provider to give these consumers a reference number, to explain the reasons behind the outage, and to contact them again once the outage has been resolved. For these reasons, we recommend the ACMA consider removing this exception.

Alternatively, if the ACMA proceeds with this exception, we encourage the ACMA to consider adding clear guidance as to what considerations a provider must make and what actions it must perform when a consumer reports an outage caused by a natural disaster. Paragraph 17B(1)(c) requires a provider to consider whether these reports should be treated as ordinary complaints instead, which leaves these consumers in a position similar to the one predating the proposed amendments, where some reports will be treated as complaints and others may not be.

6. The proposed network outage complaints process may create additional barriers between consumers and the resolution they are seeking

Question 4: Is the approach of prioritising the restoration of services over the resolution of other complaints related to network outages appropriate? If not, please explain why and describe any alternative and/or additional approaches that could better meet the objective of prioritising complaints relating to network outages in the direction?

Question 5: Are the proposed processes and actions to prioritise complaints from consumers affected by network outages reasonable and practical? If not, please explain why and describe any alternative and/or additional approaches that could better meet the objective of prioritising complaints relating to network outages in the direction?

Question 6: The proposed drafting envisages that, if the network problem is rectified but this does not achieve the default resolution of a network outage complaint (restoration of service), then the consumer will need to actively contact their CSP to seek assistance before their network outage complaint is closed. Also, if the default resolution is achieved but the consumer remains dissatisfied with this outcome, they will need to raise a new complaint through the standard, non-

network outage complaints process. Are these approaches appropriate? If not, please provide details of alternative ways to manage these scenarios.

When a consumer complains about a difficulty with their service (e.g. slow data speeds, unreliable service, or an outage), we believe a typical resolution of that complaint would involve the following two steps:

- (1) the restoration of the services, and
- (2) the remediation of any detriment caused by the outage (such as through credits, refunds, or some other compensation to account for the period without a service).

If the TIO received a complaint about a service difficulty or outage, our process can continue to handle this issue as a single complaint until both of those steps have been completed or some other agreement has been reached between the consumer and the provider.

In contrast, the ACMA's proposed process would split up the consumer's complaint into two separate processes, in the hopes that addressing the first part of the resolution through one process (the default resolution of service restoration) will minimise the need for the second part of the resolution for the majority of consumers (remediation). We see this approach having some efficiencies for short outages, particularly those happening outside of business hours or peak periods, or those paired with suitable bulk offers of resolution from providers.

However, we believe this new process will unintentionally make it more difficult for consumers to resolve their complaints when they have been affected by longer or more impactful outages, and the new process may be less accessible for consumers who are seeking a tailored outcome for their complaint.

We outline several of these barriers below:

1. **The default resolution, without further obligations, is unlikely to resolve many complaints about longer outages.** We have seen significant local outages that have lasted multiple months, and which have had a substantial, ongoing impact on the residents of regional and remote towns. In those instances, consumers may be more likely to want a tailored or more substantial offer of resolution, and so the proposed process may be less efficient at resolving these complaints.

Case study: Outages in Abermain, NSW would only attract the default resolution despite lasting several months

Between September and November 2024, our office received several complaints from residents of Abermain NSW, who reported town-wide outages relating to damage to their local mobile tower. Residents were concerned that when they called their providers, they were initially given an estimated restoration date of March 2025. We understand these services were ultimately restored by December 2024.

We understand Abermain has a population of over 2,500 people and the outage lasted approximately 2-3 months, so these complaints would likely fall within the definition of a network outage complaint. The proposed network outage complaints handling process would therefore apply the default resolution of restoring these services, with no other requirement to redress the impact of the outage until the consumer creates a second complaint.

2. **The proposed process inappropriately places the onus back on consumers to continue their complaint.** When a consumer complains to their provider about an outage, the new process says their complaint ends when the outage has been resolved, even if the consumer tells the provider they are seeking a different outcome. The onus is then placed on the consumer to contact their provider again and initiate another complaint in order to continue seeking the resolution they were after. As we can infer from the CPRC research in 2024,³ consumers are likely to find this process exhausting, and many consumers may be deterred from seeking outcomes they may validly be entitled to. Placing the onus on consumers to re-enliven their complaint does not build trust and confidence that the telco industry's customer service and complaint handling processes are accessible and easy for consumers to navigate.
3. **The proposed process can be unnecessarily slow for a consumer seeking a tailored resolution.** When a consumer is unsatisfied with the outcome of their network outage complaint, the proposed process requires that consumer to 'restart' their complaint under the regular complaints handling process. The consumer's complaint would then be subject to the full timeframes of the regular complaints process, even though the provider:
 - a. is already aware of the instigating issues
 - b. may have already rectified the service difficulties
 - c. has already had an opportunity to make an initial offer of resolution to this class of consumer through a bulk offer, and
 - d. may have already learned what the consumer is seeking through correspondence during the original complaint.

The resolution timeframes for a regular complaint are therefore unnecessarily long for a secondary network outage complaint, especially when these complaints were already part-way towards a resolution at the closure of the primary complaint.

4. **The creation of a secondary complaint creates additional practical difficulties for providers and consumers.** As the new process requires consumers to generate a second complaint to continue seeking a non-default resolution, it also requires providers to generate a new unique complaints reference number, with no process guidance as to how these complaints should be linked together. Consumers may then be required to speak with a different complaints handling team, they may be required to begin their story from the start, and they may be required to expressly use the language of dissatisfaction in order for their contact to be treated as a complaint. All of these appear contrary to the other amendments proposed by the ACMA.

Overall, we are concerned the 'doubling-up' of complaints in this new process is likely to deter consumers from seeking tailored outcomes and will undermine consumer confidence in the telco industry.

To avoid these issues, we recommend the ACMA modifies these processes to ensure there is only a single, easy to navigate process for complaints. The default resolution of an outage complaint may still be the restoration of the service, but if the consumer is not satisfied with that outcome, the complaint should continue until the consumer's service has been restored and any related detriment has been addressed.

³ CPRC, [Barriers to effective dispute resolution in the telco industry](#) (July 2024).

7. More guidance is needed for situations where services have not been restored

The Discussion Paper states that:

“If the consumer informs the CSP that their affected service has not resumed after the network outage is rectified, priority must be given to these consumers to restore their services within 2 working days of the consumer contact and before their network outage complaint can be closed.”

We were unable to locate this obligation in the proposed amendments to the Standard. By our reading, the proposed amendments may only require providers to send written notice to the consumer once the outage is repaired, guiding the consumer on what steps to take if the service is not working. Regardless of the consumer’s response, the provider may then close the complaint within three days of sending this written notice.

For urgent complaints, there is an additional requirement that a provider must proactively contact the consumer within two days of sending the written notice to confirm whether or not the service is working – but the provider may still close the complaint 1-3 working days after this contact.

We disagree with this portion of the process. If the consumer contacts their provider to complain that their service is not working, the complaint should not be considered resolved until the service is working or some other agreement has been reached. As with the section above, the process should not require a consumer to lodge a second complaint if the default resolution of the first complaint did not resolve their complaint. The process should also not place the onus on the consumer to initiate this second complaint.

Question 7: Is the requirement for CSPs to help keep certain categories of customers connected who contact them in a network outage, and who may be at risk of extra harm due to the loss of service, appropriate and practical? If not, please explain why and describe any alternative and/or additional approaches that could be used

We recommend the amendments should provide clearer obligations on providers as to how to handle urgent complaints.

Through the section 17D description of the ‘default resolution’, providers must complete all necessary actions to rectify the outage:

- (a) as soon as reasonably practicable for a network outage complaint; and
- (b) as soon as possible for an urgent network outage complaint.

By our reading of these two paragraphs, when a network outage complaint is urgent, a provider must go beyond what is reasonably practicable in order to resolve the complaint as soon as possible. This would mean a provider would be required to take every action within the limits of possibility, regardless of cost or practicability, to restore a service that is the subject of an urgent network outage complaint. We do not believe this is the intended obligation.

8. Comments on the information provided to consumers

Question 9: Do the proposed requirements in the network outage complaints-handling process set out all the information that would help consumers understand and use this complaints process. Are there aspects of this complaints process that should be changed, added or removed? If so, please explain why and describe any alternative approaches that would be more appropriate

The Complaint Handling Standard’s network outage complaint provisions should also require providers to give consumers an estimated date of restoration of service. This obligation

would complement similar obligations in paragraphs 13(1)(e) and (f) of the Customer Communications for Outages Standard

This information is important for consumers who may need to invest in interim services during the outage period. Furthermore, if the restoration date is more transparent, the consumer will be more confident that the outage is being handled correctly, and will be in a better position to make informed decisions about whether or not to escalate their complaint.

9. Comments on record-keeping obligations

Question 10: Do the proposed amendments to complaints monitoring and analysis, complaints record-keeping and reasonable assistance obligations appropriately adapt these rules to incorporate the introduction of a network outage complaints category? If not, please explain why and describe any alternative approaches that would be more appropriate for these areas

As outlined in part 6 of this submission, we recommend a network outage complaint to be treated as a single complaint, whether or not the consumer is seeking an additional remedy beyond the default resolution.

However, if those two complaints remain separate under the new process, the requirements in s.20(1) should be modified to also include reference to any information gathered under s.20(2), as the two complaints will be interlinked. Any correspondence provided under the network outage complaint will be relevant to the resolution of the subsequent non-network outage complaint, and it should be easy for providers' complaints handling teams to view any information it already has on file from the previous complaint.

Additionally, if the two complaints are kept separate, we recommend the ACMA updates the rules in s.20(2) to ensure the following are recorded:

- The unique reference number described in s.17C(b), noting that its equivalent must be recorded for a non-network outage complaint (s.20(1)(b)), and
- Records of any reason given by a consumer who has declined the default resolution of a complaint. We note s.20(2)(d) asks providers to keep records of whether the consumer was dissatisfied with the default resolution, but does not expressly require providers to detail why that consumer was dissatisfied. While this may already be covered by 20(2)(f), its equivalent is specified for non-network outage complaints (20(1)(g)). To avoid any doubt around this obligation, we recommend this list be modified to expressly include this requirement.

10. We strongly support the amendments that improve the accessibility and transparency of complaints handling processes

Question 11: Are the proposed amendments likely to make it easier for consumers to find their CSP's complaints handling process and improve transparency of this process? If not, please explain why and describe what alternatives or additional measures would achieve this in a way that meets the direction's objectives

Question 12: Are the proposed amendments likely to make it easier for consumers to contact their CSPs with a complaint and have it treated as a complaint? If not, please explain why and describe what alternatives or additional measures would achieve this in a way that meets the direction's objectives?

Question 13: Are the proposed amendments likely to make it easier and more accessible for consumers to contact their CSPs with a complaint? If not, please explain why and describe any alternatives or additional measures that would achieve this in a way that meets the direction's objectives?

We support the introduction of many of these amendments, which we believe will both improve the accessibility of complaints handling processes and close some of the gaps we are currently seeing in our complaints.

Our office regularly receives complaints from consumers who say they cannot speak with their provider directly, and that their calls are either redirected between different teams, or they are promised a callback that never occurs. The proposed amendments – particularly the new requirements on providers to minimise wait times and call transfers (s.9(a)) and to make reasonable efforts to resolve complaints in a manner that best suits the needs of the consumer (s.13(1)(aa)) – are a good step towards addressing these issues. While these provisions may be difficult to enforce for individual complaints, our office can identify when a provider is regularly failing to follow this requirement for many consumers, and we can take action on those systemic issues.

Similarly, the new amendments clarify an ambiguous requirement in the Complaints Handling Standard around whether a provider needs to directly answer the phone to accept a complaint. The Complaints Handling Standard currently requires providers to “permit consumers to make complaints by telephone” (s.8(1)(h)), but the presence of subparagraph s.12(2)(b)(iv) implies that providers do not have to answer the telephone call, as long as they take a voicemail message and acknowledge that they have received a complaint. We believe this practice falls short of the intention of the s.8 accessibility requirements in the Standard. We support the proposed amendments in s.8(1)(h), s.8(1A) and s.12(2) that aim to ensure that consumers can directly speak with a staff member to make their complaint, in a manner that is accessible, and in a manner that does not rely on voicemail messages.

We are also pleased to see the proposed amendments clarify the requirements on where the provider must display their complaints handling process on their website (s.8(3)-(4)).

As for additional measures, we note that we sometimes encounter international providers whose homepages or policy do not adhere to the requirements in the Complaints Handling Standard, typically because they either comply with laws of other countries or because the homepage is a location-neutral portal for multiple countries to access. We believe the proposed amendments are clear in their rejection of this practice, however we suggest an amendment to clarify the application of these requirements to providers whose websites are directed at customers both in Australia and overseas.

11. We support the introduction of shorter resolution timeframes for complaints

Question 14: Will the proposed changes to complaint resolution timeframes allow sufficient time for CSPs to resolve a complaint in a way that meets the Direction’s objectives? If not, please explain why and describe any alternative and/or additional approaches that could be used to meet those objectives.

We are supportive of the changes that make internal dispute resolution practices more efficient. Other stakeholders will be in a better position to discuss the practical effect of these shortened timeframes. However, we note that with the rise in new billing platforms, customer apps and automation, it may be easier than ever for many providers to make simple changes to accounts and for consumers to verify those changes, and so it may be feasible for the timeframes of complaint resolutions to be shortened.

12. We support the improved information about the TIO, and provide insight on compliance with these provisions

Question 15: Will the proposed changes, combined with existing obligations, provide consumers with clear and sufficient information at appropriate times in relation to avenues for external

dispute resolution, specifically the TIO? If not, please explain why and describe any alternative and/or additional approaches that could be used to achieve that outcome.

We are supportive of the changes to references to the TIO, including the proposed s.15(5) requirement that a provider must tell consumers about the TIO if a complaint has continued for more than 30 days. This requirement helps ensure consumers are more aware of their options if they feel the complaint is not progressing towards a resolution, and incentivises providers to ensure complaints are resolved within a calendar month.

On a related note, we are currently working to improve provider compliance with these provisions of the Complaints Handling Standard. Our anonymous surveying of consumers in the last two years has seen low proportions of consumers saying their provider had referred them to the TIO. When we put this survey data to the providers, providers questioned the data and said consumers may be misremembering the advice given to them, or their complaints may never have enlivened their Complaints Handling Standard obligations to discuss the TIO (for example, because the complaint did not experience a delay). We accept this may be the case for some consumers, however our survey data alongside the findings of the CPRC⁴ highlight a general lack of awareness of consumer rights beyond internal dispute resolution.

We are developing a set of Member Guidance to ensure providers are giving appropriate advice to consumers about their options. Our Member Guidance is not complete at the time of this submission. Our initial discussions have seen some providers adopt welcome changes to when and how they refer consumers to the TIO. However, we note that some providers have adopted a strict and narrow interpretation of the Standard that does not reflect an intent to ensure consumers are made aware of their right to complain to the TIO if the consumer believes the complaint remains unresolved. This is a work in progress, and we will provide more feedback on these provisions of the Standard in the near future.

13. Minor changes and recommendations

We note the following minor administrative points:

- The term “suffering” financial hardship in s.8(1)(l)(ii) should be amended to “experiencing” or “affected by” financial hardship, or some similar term
- The term “complaint handling” should be amended to “complaints handling” in ss10A and 19(b), and in the notes under s17B(4) and under the definition of a network outage complaint
- Section 8A proposes a 7 working day timeframe for the updating of complaints. The ACMA may wish to consider revising this to a 7 calendar day or 10 working day timeframe.

We look forward to seeing the outcomes of this consultation.

Yours sincerely,

Cynthia Gebert
Telecommunications Industry Ombudsman

⁴ CPRC, [Barriers to effective dispute resolution in the telco industry](#) (July 2024).