

1 August 2025

Australian Competition and Consumer Commission (ACCC)  
GPO Box 3131  
Canberra ACT 2601

By email: [rkrinbox@accc.gov.au](mailto:rkrinbox@accc.gov.au)

Dear ACCC,

## **TIO submission on the Record Keeping Rules Review 2025**

Thank you for the opportunity to provide feedback to the ACCC's review of the Telecommunications Record Keeping Rules (RKR's).

The TIO helps consumers and occupiers with phone and internet complaints. We also collect and review information about complaints and use our insights and experience to provide analysis and views to our stakeholders. Access to key pieces of information and data are important to us in the breadth of our role.

We support the functions of the RKR's that assist the ACCC in monitoring developments in the telecommunications market, collecting valuable data and informing its regulatory decisions.

We recognise that changes in the telecommunications market necessitate updates and improvements to how data is collected from the industry. We support the goal of the review to make this dataset more comprehensive while streamlining the collection process and reflecting changes in how telecommunications services are supplied and used by consumers.

Our submission offers feedback on how we propose to use information that will be collected using the new RKR's to support our functions and improve our service.

### **1. Information collected by the new RKR's can assist our industry improvement function**

Under our [Terms of Reference](#), we help drive improvements in industry practice by identifying and investigating systemic issues. We define systemic issues as any issue with a telecommunications provider's systems, policies, processes or practices that have or are

likely to have a negative effect on a number of consumers or occupiers or a particular type of consumer or occupier. We also publish reports about our activities and issues that relate to our scheme and the industry<sup>1</sup>.

Monitoring trends in providers' complaint numbers is a key method we use to identify possible systemic issues. For example, when we identify that a provider is receiving a disproportionately high number of complaints relative to their assumed market share, this may indicate that a systemic issue is present.

The ability to compare a provider's overall complaint numbers to its market share, specifically by examining complaints per service in operation, can be a valuable tool for identifying possible systemic issues for our office, as well as regulators and government. Monitoring and reporting on this information would improve transparency for our stakeholders and help us identify opportunities for industry improvement.

Currently, our ability to understand market share is limited. The ACCC's [NBN Wholesale Market Indicators Report](#) provides data on market share and numbers of services in operation, but only in relation to NBN services.

Access to the information proposed to be collected under the new Wholesale and Networks RKR would improve our ability to identify and investigate systemic issues by helping us compare our records with numbers of services in operation across all service and access technology types.

We acknowledge that some of the information we seek to access may be considered commercially sensitive by the industry, however, we believe access to it will assist us in improving industry practice, driving improvements to policy and regulations and building consumer trust.

## **2. Information collected by the Audit of Telecommunications Infrastructure RKR can assist our complaint handling**

Our office receives complaints about a broad range of issues related to telecommunications infrastructure, such as the availability and connection of services, mobile coverage, faults and infrastructure compliance issues.

Accurate and comprehensive data about the location and extent of telecommunications infrastructure can help us resolve these complaints and provide information to consumers and providers. For example, our ability to determine:

- the location and coverage of mobile sites can help us determine whether a problem with a consumer's mobile service is caused by poor coverage or a different issue, or when a consumer says a provider's coverage map was inaccurate, and

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<sup>1</sup>[Systemic Investigation Report, June 2023](#)

- the geographical extent of a Customer Access Network can help us inform consumers what services are available to them and of their options for choosing a product that suits their needs.

While some of this information is publicly available (for example, we can gather partial information from the [Radio Frequency National Site Archive](#) or information volunteered on the websites of various carriers and service providers), access to additional datapoints will improve our overall visibility of the presence of telecommunications infrastructure and help us navigate instances where the currently available datapoints contain conflicting information.

For these reasons, we recommend the ACCC considers sharing information collected using the new Audit of Telecommunications Infrastructure RKR with our office.

We look forward to the outcome of this consultation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Cynthia Gebert', followed by a long, horizontal, slightly wavy line that extends to the right.

Cynthia Gebert  
**Telecommunications Industry Ombudsman**