



21 October 2025

Paul Nicholas
Manager, National Interests
Australian Communications and Media Authority
PO Box 13112
Law Courts
Melbourne VIC 8010

Submitted via the submission form.

Dear Mr Nicholas,

TIO submission to the ACMA's Proposal to amend the Telecommunications (Service Provider — Identity Checks for Prepaid Mobile Carriage Services) Determination 2017

Thank you for the opportunity to comment on the Australian Communications and Media Authority's (ACMA) proposal to amend the *Telecommunications (Service Provider — Identity Checks for Prepaid Mobile Carriage Services) Determination 2017 (the Prepaid Determination)* to enable the use of government-accredited digital identity services.

We support enabling government-accredited digital identity services for prepaid ID checks

We believe that consumers should have access to range of robust, yet accessible, ID verification methods.

We are pleased to see that the proposal would reduce the frequency with which consumers are required to share sensitive, personal information. We know that this is an area of concern for consumers, as following the September 2022 Optus data breach, we received complaints from consumers who were apprehensive about their personal and financial safety.

A broader review of the Prepaid Determination is needed to support all Australians to verify their identity and access prepaid services

The Prepaid Determination should allow the use of alternative identity proofing to support consumers who experience barriers to obtaining standard identification documents or have inconsistent personal details across their identification documents.

We have been made aware that a substantial number of consumers from some First Nations communities are experiencing difficulty in verifying their identity and activating their prepaid

services. With coverage improving in regional and remote areas of Australia, many First Nations and other consumers are purchasing handsets and prepaid plans for the first time. We understand that people in these communities are spending what can be a significant amount of money on services that they cannot activate, as they do not have or cannot obtain standard identification documents that meet the obligations in the Prepaid Determination.

The detriment to these consumers is high. We were told about a case where a victim-survivor fleeing a domestic violence situation could not activate her sim, despite providing her Medicare details and following her telcos' activation instructions.¹ This consumer lived in remote Australia, so they could not resolve this issue by simply visiting their telcos nearest store. This situation caused immense stress for the victim-survivor and ultimately resulted in her being cut off from her lifeline to safety.

While the ACMA's current proposal does not create additional barriers for First Nations and remote communities, it will not address existing barriers which limit their connectivity and cause financial detriment.

We acknowledge the difficulty in finding the correct balance to support flexibility while also preventing fraud. However, we are concerned that without a tailored solution, this problem will continue to grow as a harmful by-product of coverage improvements. This may prevent vulnerable consumers from receiving the much-needed benefits of expanded coverage for remote and regional communities.

We strongly recommend that the ACMA takes the lead on a sector-wide response to this issue ahead of the broader 2027 review of the Prepaid Determination. Prompt action on this issue will also support the Government meeting target 17 of the National Agreement on Closing the Gap, which is that Aboriginal and Torres Strait Islander people have equal levels of digital inclusion by 2026.

We are happy to provide the ACMA with further detail regarding these issues, including connecting the ACMA with community representatives who are supporting impacted consumers in the Northern Territory. We have also been working with Telstra to explore practical solutions that could be adopted across the sector to address barriers faced by First Nations and other consumers. We welcome the ACMA's participation in these ongoing discussions.

Yours sincerely,

Cynthia Gebert

Telecommunications Industry Ombudsman

¹ We understand from consumer representatives and telcos that it is common for Medicare cards of First Nations consumers to be rejected by the Document Verification Service, as details such as names or date of birth can change from one database to the next.