



Telecommunications  
Industry  
Ombudsman

# Proposed public register of telecommunications outages

TIO submission to the Australian  
Communications and Media Authority

February 2026



## Table of Contents

<b>1</b>	<b>Introduction</b>	<b>3</b>
<b>2</b>	<b>We favour a single centralised outage register</b>	<b>4</b>
<b>3</b>	<b>To ensure the usability of outage register data, its formatting and access methods should be prescribed</b>	<b>5</b>
<b>4</b>	<b>The outage register rules should apply consistently across carriers</b>	<b>6</b>
<b>5</b>	<b>Information requirements should be consistent across outage notifications and outage register entries</b>	<b>7</b>
<b>6</b>	<b>Additional categories of information could be included in outage register entries and outage notifications</b>	<b>8</b>
6.1	Unique outage identifiers	8
6.2	Affected connection technology types	9
6.3	Information about the effect of an outage on access to Triple Zero	9
6.4	Information about the impact of outages on critical or high-priority premises	9
6.5	Carrier-internal priority status for outages	10
6.6	Information about whether an outage was identified retrospectively	10
<b>7</b>	<b>We support obligations for CSPs <i>and</i> carriers to publish links to outage registers on their websites</b>	<b>11</b>
<b>8</b>	<b>Links to outage registers should be published on website homepages, and should link to registers directly</b>	<b>11</b>
<b>9</b>	<b>The Standard’s current thresholds for major outages and significant local outages should not be raised</b>	<b>12</b>
<b>10</b>	<b>The ACMA should consider broader requirements for notifications about outages caused by natural disasters</b>	<b>13</b>
<b>11</b>	<b>We would support information about planned outages being included in carriers’ outage registers</b>	<b>14</b>



# 1 Introduction

Thank you for the opportunity to comment on the ACMA's draft amendments (**the Outage Register Amendments**)<sup>1</sup> to the *Telecommunications (Customer Communications for Outages) Industry Standard 2024 (CCO Standard)*. These amendments will vary the CCO Standard to introduce requirements for carriers to establish and maintain publicly available registers of outages affecting their networks. Major outage events affecting Australia's telecommunications networks have highlighted the impact of those events for the public, most notably following the Optus Triple Zero outage of September 2025.

We support the principle that telcos should be transparent about outages affecting their networks, and welcome regulatory requirements for them to make outage information readily and publicly available. Greater transparency of outage information will make that information available to emergency services organisations and other relevant stakeholders, informing analysis that may improve responses to outages in future. A publicly available register of outage information will give end-users easy access to information about outages affecting their services and assist our office in handling relevant complaints. It will also help ensure carriers are accountable for outages affecting their networks.

We are pleased to see the proposed amendments will require carriers to add outage information to their registers as soon as practicable after relevant information becomes available to them, rather than after an outage has been resolved. This will help ensure the outage registers are relevant and useful to end-users, during the periods they are affected by outages.

We offer the following further commentary on the draft Outage Register Amendments, based on our experience dealing with telecommunications complaints, and as a 'relevant stakeholder' that receives outage notifications under the current CCO Standard. We also comment on several general areas of the Standard where the ACMA has invited feedback, in preparation for a review of the Standard later this year.

As outlined in our commentary below, we favour a single, centralised outage register rather than a decentralised structure where each carrier establishes and maintains its own register. In our view, a centralised register would better serve the interests of consumers, industry, and other stakeholders. Nonetheless, we acknowledge the Government's preference for carriers to maintain their own registers. Accordingly, much of our commentary proceeds on the basis that the Outage

---

<sup>1</sup> The amendments are contained in the draft *Telecommunications (Customer Communications for Outages) Industry Standard Variation 2026 (No. 1)*.



Register Amendments will require multiple decentralised registers (as required by the current drafting).

We look forward to learning the outcome of this consultation and contributing to further consultation on the future of the CCO Standard later this year.

## 2 We favour a single centralised outage register

As a relevant stakeholder under section 10 of the CCO Standard, our office receives notifications from carriers about major outages and significant local outages. We requested to be included as a recipient of these outage notifications while the CCO Standard was being developed, as awareness of outages can assist in our dispute resolution and industry improvement work. However, the high volume of notifications we receive, combined with their varied content and format across carriers, reduces their overall effectiveness. The volume of outage notifications we receive can make it difficult to track the course of individual outages. The lack of standardisation in the notifications we receive from different carriers inhibits our ability to automate the processing of notifications to create workable databases.

We anticipate the introduction of outage registers under the proposed amendments will significantly improve our ability to operationalise the use of data about major outages and significant local outages with our systems. We support the provisions that seek to require a level of standardisation in the format of outage information listed in carriers' outage registers.<sup>2</sup> We particularly welcome the requirements of proposed subsection 25(6), for information in the registers to be presented in a manner that allows the Triple Zero Custodian, emergency service providers, and relevant stakeholders to take extracts from outage registers. This will assist us in extracting data from outage registers and integrating it with our systems, and in turn help us manage complaints from consumers affected by outages and contribute to industry improvement.

However, a decentralised structure for the outage registers presents challenges for any stakeholders who may seek to utilise register information at scale across the industry. The ACMA's licensed carrier register currently lists 342 active licensed carriers. We acknowledge that only carriers whose networks are used to supply relevant carriage services to end-users would be required to establish outage registers under the proposed amendments. Nonetheless, we anticipate a decentralised structure will result in a significant number of different registers.

---

<sup>2</sup> In particular, the prescribed form for entries in outage registers set out in proposed Schedule 1 to the CCO Standard.



Even with a level of prescribed standardisation in register information, carriers may reasonably expect some flexibility in how they present outage information on registers they manage. Differences in formatting and presentation between carriers may create difficulties for stakeholders in extracting and processing information from the registers. More broadly, the fragmentation of outage information across multiple different registers will not promote transparency about outages to the extent a centralised register would.

On balance, we favour a single centralised outage register, rather than several decentralised registers. In our view, much of the value of a publicly available outage register is that it would provide an authoritative and standardised source of information about Australia's network outages. Having a single, centralised register would avoid the fragmentation of outage information and provide a single source of truth about outages.

While our preference is for a centralised outage register, we acknowledge the ACMA has proceeded on the basis that each carrier will establish and maintain its own register. We also acknowledge there are benefits to a decentralised structure. For example, a decentralised structure may be easier for carriers to implement, and carriers' individual websites may be a more intuitive location for end-users to find outage registers. If a decentralised system of outage registers is to be workable for relevant stakeholders, there will need to be clear and strict requirements to standardise the presentation of information in carriers' registers.

### **3 To ensure the usability of outage register data, its formatting and access methods should be prescribed**

We note the ACMA has asked for stakeholder views about the data format of entries in carriers' outage registers. We anticipate the data contained in the registers is likely to have significant value for the Triple Zero Custodian, emergency services organisations, the ACMA, the National Emergency Management Agency, and our office (among other relevant stakeholders) in responding to outages, planning for future outages, and developing relevant policy. Accordingly, we are concerned to ensure that outage register data is practically useable for stakeholders.

As a relevant stakeholder, we anticipate that our ability to use information extracted from carriers' registers will (to an extent) depend on the consistency of formatting between different carriers' registers. The greater the number of formatting inconsistencies between carriers that we will need to account for when incorporating data into our systems, the more challenging it will be to create a workable system.

Our technical area is experienced with data formats that are generally used across the industry, including (for example) CSV and JSON. We do not have a preference for a particular data format. However, we strongly encourage the ACMA to prescribe a data format that all carriers must use for their registers. This will support the effective useability of the data across different carriers' registers for all relevant stakeholders.

To the greatest extent practicable, we also support the prescribed form for register entries (in proposed Schedule 1 of the CCO Standard) tightly controlling the content of entries in each data field. For example, where the fields of the Schedule call for the entry of a date and estimated time, the date and time format should be prescribed to avoid inconsistency, and the relevant time zone should be specified. Similarly, the data field requiring carriers to list the geographical areas impacted or likely to be impacted by an outage should require the entry of affected post codes or local government areas, rather than (or possibly in addition to) generalised descriptions.

Ideally, any data fields that may be susceptible to being filled with inconsistent information categories or with information that could be formatted in different ways should be controlled, to avoid inconsistencies.

In addition to the formatting of data contained in carriers' outage registers, it is also important that relevant stakeholders have a level of consistency in the methods they will use to access data from carriers' outage registers. The ACMA's consultation paper contemplates that relevant stakeholders may access outage register information via direct downloads or using APIs. We encourage the ACMA to prescribe the access method carriers must make available, to ensure consistency.

## 4 The outage register rules should apply consistently across carriers

The ACMA has also asked for feedback on whether it should exercise the discretion it is allowed under the *Telecommunications (Customer Communications for Outages Industry Standard Amendment) Direction 2025 (the Outage Register Direction)* to treat different classes of carrier and carriage service provider (CSP) differently, or to exempt certain classes of carrier or CSP from particular requirements.

We support a consistent approach across the industry, where the same rules apply to all carriers whose networks are used to deliver services to end-users, and the same rules apply to all CSPs. A consistent approach will ensure all end-users of telco services have access to an outage register that contains information relevant to their services. It will also ensure a reasonably consistent experience for those who wish to access an outage register, irrespective of what CSP supplies the relevant services, and which carrier's network is used to supply them.



While it is desirable to avoid disproportionate regulatory burden for telcos, we observe that most of the substantive provisions of the draft Outage Register Amendments create obligations for carriers, not CSPs. Therefore, the telcos most affected by the amendments are likely to be better resourced and better able to comply with the requirements.

We also emphasise the importance of the registers delivering accurate and useful outage information about services delivered to end-users using networks operated by *any* carrier (including smaller or less prominent carriers). We receive complaints from consumers who say their communities experience regular outages, and feel they are not kept adequately informed about those outages. In one recent example, we received a series of complaints about similar issues from residents of a community whose fixed-line services are delivered using the network of a smaller Statutory Infrastructure Provider.

It is important the Outage Register Amendments ensure carriers' transparency and accountability for outages by applying consistently across different carriers. Absent a compelling justification, we would not support an approach that imposes less onerous requirements on smaller carriers.

## **5 Information requirements should be consistent across outage notifications and outage register entries**

We support changes to the draft Outage Register Amendments and the existing CCO Standard, so that the categories of information a carrier must include in notifications about an outage mirror those it must include in its outage register for that outage. That is – the categories of information listed in current subsection 13(1) (setting out most of the substantive categories carriers must include in outage notifications) and those in proposed subsection 22(2) (listing information to be included in outage register entries) should as far as practicable be the same. This will achieve greater simplicity and standardisation in the processes put in place by the CCO Standard as a whole.

Carriers will in any case be required to collate all the relevant categories of information about a given outage (variously to comply with the notification and outage register requirements). Therefore, it is unlikely that unifying the categories will represent a significant additional burden for carriers. On the other hand, unifying the categories will ensure that all relevant and useful information is sent in notifications, and retained in carriers' outage registers for future reference.



We would particularly support changes to proposed subsection 22(2) so that outage registers must include information about the cause or likely cause of an outage. Carriers are already required to collect this information for inclusion in their notifications to relevant stakeholders and others under paragraph 13(1)(b), subject to an exception where the carrier has reasonable grounds to believe that disclosing this information could compromise its network security or national security. Requiring carriers to include this information in their outage registers (subject to the same exception relating to matters of security) would promote transparency about the cause of outages. It may assist our organisation in determining the appropriate remedies for complaints involving network outages. It will also help industry and policymakers plan more effectively to reduce the incidence of outages going forward.

## **6 Additional categories of information could be included in outage register entries and outage notifications**

Based on our review of the proposed and current information requirements for outage register entries and outage notifications,<sup>3</sup> we have identified some additional categories of information that could be included in the requirements. We recommend adding the following categories of information to the content requirements for outage register entries and outage notifications, as they will provide more fulsome and useful information for all stakeholders.

### **6.1 Unique outage identifiers**

The Outage Register Amendments could be altered so that carriers are required to include in their outage notifications a unique identifier (such as an alphanumeric string) to help identify the individual outage. This identifier could then be associated with the outage's entry on the relevant carrier's outage register. Requiring the use of unique identifiers for each outage would help end-users and relevant stakeholders pinpoint the correct register entry for a given outage and (for example) search for updates about that outage.

---

<sup>3</sup> Under subsections 22(2) and 13(1) of the CCO Standard respectively.



## 6.2 Affected connection technology types

The CCO Standard could require both outage notifications and register entries to include information about the connection technology type or types affected by an outage. We expect this category would specify the connection technology type of affected NBN services such as Fibre to the Premises or Fixed Wireless, or equivalent descriptions for other Statutory Infrastructure Providers. In the case of mobile services, it would specify whether an outage affects 4G connections, 5G connections, or both.

In our experience, some carriers already include this information in some of their outage notifications, but the practice is not consistent. If carriers were required to include it in their outage registers (to the extent it is available to them), it would help end-users confirm whether their services are affected by an outage, and promote greater transparency about outages.

## 6.3 Information about the effect of an outage on access to Triple Zero

This consultation and the development of the draft Outage Register Amendments have occurred in the context of recent outages affecting Australians' access to Triple Zero. We are pleased to see the proposed amendments would add notes to relevant definitions to clarify that outages which affect end-users' ability to call Triple Zero but not their telephone services more generally are covered by the CCO Standard.

Given the critical importance of transparency about outages that affect Triple Zero, carriers should be required to specify in their outage registers and outage notifications whether an outage affects end-users' access to Triple Zero or another emergency service number.

## 6.4 Information about the impact of outages on critical or high-priority premises

While network outages can cause significant disruption for all end-users, we note they can have particular impact for premises that provide critical services or may otherwise be considered of high priority to the community, such as hospitals, police stations and fire stations.

To the extent it is known to a carrier whether an outage affects particular critical or high-priority premises, requiring it to include this information in outage registers would support transparency about the impact of that outage for affected communities.



## 6.5 Carrier-internal priority status for outages

We understand it is standard industry practice for each outage to be assigned a carrier-internal priority level according to a pre-defined matrix. As we understand the practice, outages are generally assigned a priority status between (for example) P1 and P4. The priority status of an outage then goes to determine matters such as expected rectification timeframes for an outage.

The ACMA should consider including information about an outage's assigned priority status in a carrier's outage register to provide additional context for future analysis of outage information by policymakers and other stakeholders. It would also promote carriers' accountability for their responses to outages.

## 6.6 Information about whether an outage was identified retrospectively

We are aware that carriers sometimes identify outages only after they are resolved. We understand this can occur (for example) when a system problem causes some services to go offline, the system restores itself automatically, and only logs or registers the problem after it has done so.

These scenarios could in theory result in an outage that meets the CCO Standard's definition of 'significant local outage', but is not entered into the relevant carrier's outage register until after it is resolved. End-users affected by such an outage would also not receive notifications about it until after it is resolved.

While we accept that a level of outages that are only identified retrospectively is unavoidable, it may be beneficial to policymakers to have visibility over how frequently they occur. Requiring carriers to specify when an outage was only identified retrospectively on their outage registers would increase the transparency of these scenarios and could help our office manage relevant complaints. It may also help identify any systemic shortcomings in carriers' processes that inhibit outages being detected in a timely manner.

## 7 We support obligations for CSPs *and* carriers to publish links to outage registers on their websites

The ACMA's consultation paper notes that the Outage Register Direction requires only that the Outage Register Amendments provide for *CSPs that are not carriers* to publish links to carriers' outage registers on their websites. The Direction does not require the ACMA to include similar obligations for carriers that are also CSPs. The ACMA has asked stakeholders whether this may be a gap in the proposed requirements.

We note that under the current drafting each carrier whose network is used to supply services to end-users will be required to publish a link to its own outage register on its website under proposed subsection 25(4) of the CCO Standard. While this should cover the needs of most customers of carriers that are also CSPs, it will not account for circumstances where such a carrier uses another carrier's network to supply some of its services. One example of such a scenario is Telstra's current partnership with Starlink, where it provides some data and voice services using the Starlink Low Earth Orbit Satellite (**LEOSat**) network.

We agree this scenario likely falls into a gap in the current drafting. We support changes to the proposed amendments so that both *CSPs and* carriers that operate as CSPs are covered by the requirements of proposed section 26 of the Standard.

## 8 Links to outage registers should be published on website homepages, and should link to registers directly

We welcome the requirements in proposed subsections 25(4) and 26(2), which will require carriers and CSPs respectively to publish links to outage registers on their websites in a prominent position. We suggest these provisions could be improved by including more explicit requirements about where the links must be published and how directly they must link to the relevant outage register.

In our experience, where telcos are required to publish on their websites links to particular documents or information, they sometimes publish those links in less prominent locations where users may have difficulty locating them. Sometimes they structure websites so that although a homepage may include a link from which the document or information can be accessed, users must navigate through a potentially confusing series of nested links (requiring several clicks) before reaching the relevant information.



We expect most carriers and CSPs would structure their websites to reflect the intent and broader requirements of subsections 25(4) and 26(2) by providing prominent links that connect directly to the relevant outage register. However, including more prescriptive requirements about where the links must be published and how they must work would ensure consistency across the industry and an easy user experience.

Ideally, the requirements should ensure links to outage registers are located prominently *on the homepage* of a carrier or CSP's website, and that they connect *directly* to the relevant outage register. These requirements could be modelled on existing provisions in other instruments, such as subsections 8(3)-(4) of the *Telecommunications (Consumer Complaints Handling) Industry Standard 2018 (Complaints Handling Standard)*. These provisions of the Complaints Handling Standard require links on a telco's website to information about how consumers can contact the telco to make a complaint to be clear and prominent, to be located on the telco's homepage, and to link to the information directly.

## 9 The Standard's current thresholds for major outages and significant local outages should not be raised

The ACMA has asked for stakeholders' views about the CCO Standard's current definitions for 'major outage' and 'significant local outage'. We would not support any change to the current definitions that would increase the services in operation (**SIOs**) or duration thresholds for major outages or significant local outages.

As the definitions are currently drafted, a major outage must affect (or be likely to affect) 100,000 or more SIOs, or all the SIOs on the relevant network in a State or Territory, and last or be expected to last more than 60 minutes. A significant local outage must affect (or be likely to affect) at least 1000 SIOs in a regional area, or 250 SIOs in a remote area, and last or be expected to last longer than six hours in a regional area, or longer than three hours in a remote area.

The definition of 'significant local outage' in particular has been a subject of much discussion throughout the CCO Standard's development process. In our previous commentary, we have argued proposed thresholds for significant local outages should be lowered to ensure consumers living in rural communities are kept properly informed about outages that affect them. For example, in our [March 2025 submission](#) to the ACMA's consultation on improving customer communications for outages, we argued a threshold of 1000 SIOs may exclude some smaller rural communities from whose residents we receive complaints. We highlighted the stories of consumers living in the regional town of Morawa in Western Australia, who told us they had experienced day-long mobile outages over more than a month in mid-2024.

We were pleased to see the ACMA respond to stakeholder concerns about remote communities being excluded from the CCO Standard by including the lower threshold of 250 SIOs and three hours for remote areas. We encourage the ACMA to consult further with regional and remote communities to determine whether the current thresholds are low enough to cover a sufficient proportion of regional and remote Australia. We would not support any change to increase the thresholds.

## 10 The ACMA should consider broader requirements for notifications about outages caused by natural disasters

The ACMA has also invited feedback about whether the CCO Standard's current provisions for notifying consumers about outages caused by natural disasters are appropriate and effective.

Currently, the provisions for telcos to notify consumers about outages caused by natural disasters are limited to requirements for carriers and CSPs to publish information about those outages on their websites.<sup>4</sup> In [our October 2024 submission](#) to the ACMA's consultation on the original draft of the CCO Standard, we argued outages caused by natural disasters should be covered by the Standard's requirements. In [our March 2025 submission](#) to the ACMA's consultation on improving customer communications for outages, we recommended the ACMA consider whether telcos should actively contact consumers about such outages.

We continue to support the consideration of broader requirements for telcos to communicate with end-users about outages caused by natural disasters. As we argued in our [October 2024 submission](#), having up-to-date information about whether and when telecommunications services will be available may be critical to keeping those affected safe.

We understand the original decision not to include notification requirements for outages caused by natural disasters may in part have been informed by concerns about mobile networks becoming overloaded with notification SMSs while they are recovering from outages.<sup>5</sup> We observe that SMS is not the only contact method by which a telco could notify end-users about an outage caused by a natural disaster. The CCO Standard also provides for notifications to be sent by email or through a telco's mobile app. Depending on the types of services affected by a given outage, these other contact channels may present a reasonable means of notifying consumers.

---

<sup>4</sup> Under subsection 9(2) and section 12B. Under subsection 9(2), if a carrier does not have a website, it may publish the information on another carrier's website or on another website it considers appropriate.

<sup>5</sup> See the discussion on page 5 of the Explanatory Statement for the original 2024 version of the CCO Standard.

We appreciate that the circumstances surrounding natural disasters often change rapidly and that the channels that are reasonably available for communicating with those affected may be limited. Restoring consumers' access to services should be prioritised over sending notifications, if it is not reasonably practicable for a telco to do both.

Nonetheless, we encourage the ACMA to consider broader requirements for notifying consumers about outages caused by natural disasters, subject to the overarching consideration that the restoration of services should be prioritised. If there is compelling evidence that notifying consumers could delay the restoration of services during a natural disaster, then requiring information to be published on telcos' websites may be a reasonable compromise.

## **11 We would support information about planned outages being included in carriers' outage registers**

The ACMA asked for stakeholder views on whether it should consider CCO Standard requirements relating to planned outages, in addition to the current requirements for unplanned outages. We understand it is currently common practice for telcos to notify their customers of planned outages that may affect their services. Accordingly, there may not be much additional benefit for end-users in new requirements for carriers and CSPs to notify about planned outages.

However, we would support requirements for carriers to include information about planned outages in their outage registers. This would promote a high level of transparency about outages, and make information about planned outages available to policymakers and other relevant stakeholders for future analysis. Given that information about planned outages will be available to carriers ahead of time (we understand several carriers already publish information about planned outages), we do not anticipate that requiring them to include information about such outages on their registers would represent a significant additional compliance burden.

Should the ACMA decide to require information about planned outages in carriers' outage registers, it may be necessary to develop a new definition for the kinds of planned outages that will be covered. When considering planned outages, the expected duration of an outage may be less relevant than for unplanned outages, as it is less likely to affect the carrier's ability to detect an outage affecting a small number of SIOs (for example).