Telecommunications Industry Ombudsman

Proposal to make mobile coverage mapping standard

TIO submission to the Australian Communications and Media Authority

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1 Introduction

Thank you for the opportunity to comment on the ACMA's draft *Telecommunications (Mobile Network Coverage Maps) Industry Standard 2026* (**Coverage Maps Standard**). The new Standard will create baseline rules for Mobile Network Operators (**MNOs**) and Mobile Virtual Network Operators (**MVNOs**) to create and publish mobile network coverage maps.

We welcome the draft Standard as an important consumer safeguard, as mobile services are increasingly essential to the Australian community. The importance of mobile services was reflected in our 2024-25 Annual Report, which found that complaints about mobile services were our most common type of complaint, representing at least 44.7% of all complaints to our office in FY25.[1] In the second quarter of FY26, mobile remained the most complained-about service type, representing at least 45.6% of all complaints to our office.[2]

Our office has long highlighted the problems consumers face when they do not receive clear and accurate information about the level of mobile coverage available to them.[3] In recent years, we supported regulatory change to require standardisation and improved accuracy in coverage maps.[4] We are pleased to see the draft Coverage Maps Standard will prescribe the methodology MNOs must use when developing coverage maps, and the coverage level thresholds and descriptions telcos must use when presenting coverage information. This will ensure a level of standardisation in coverage maps and help consumers compare the coverage offered by different telcos when selecting services.

We offer the following further commentary on the draft Standard, based on our experience dealing with mobile service complaints. We look forward to seeing the final version of the Coverage Maps Standard in March 2026.

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1 For reporting purposes, we categorise complaints as belonging to one of the five service types: Mobile, Internet, Landline, Property, and Multiple. Complaints categorised in the Multiple service type are those that relate to more than one of the other four service types. Accordingly, the 44.7% of all complaints received in FY25 that were categorised in the Mobile service type were those that related *only* to mobile services.

2 See our Quarter 2 2025-26 complaints data.

3 See, eg, our July 2022 Systemic Investigation Report 'Investigating Complaints about Essential Mobile Services', page 15; our July 2024 submission to the 2024 Regional Telecommunications Review, page 19.

4 See, eg, our June 2023 submission to Stage 1 of the 2024 Telecommunications Consumer Protections Code Review, pages 16-17; our September 2025 Universal Services Policy Position Statement, page 4.

2 Descriptions of mobile coverage should be meaningful for consumers and include practical examples

It is important the Coverage Maps Standard reflects the objectives that maps reasonably represent the on-ground experience of using a service, and explain relevant assumptions and limitations.[5] To best achieve this, we recommend that the names and descriptions of the four coverage levels set out in Table 3 in Part 2 of Schedule 1 should be revised to ensure they are reasonably meaningful to consumers. Such information would help end-users understand what they are likely to be able (and unable) to do with a mobile service at a given location, and therefore reduce the likelihood that consumers will be disappointed with the service they receive.

2.1 The 'Useable' coverage level should be renamed to avoid misinterpretation and confusion

The label 'Useable' for the third coverage level (with signal strength between -105 dBm and -115 dBm) may suggest a better user experience to some consumers than they are likely to receive at that coverage level. Although the proposed description of the 'Useable' coverage level makes clear that users may experience variable performance and reduced reliability in voice calls, SMS and data connections, some consumers may not read the full description, or may be more influenced by the 'Useable' label. Such consumers may assume a 'Useable' level of coverage will allow them to use their service the way they normally expect to use it. That is – with minimal disruptions to their service.

The ACMA's consultation paper notes the New Zealand Commerce Commission uses the label 'Limited' for the lowest available coverage level in its arrangements.[6] A label of 'Limited' rather than 'Useable' could more effectively convey the service limitations the ACMA has set out in the full description of the coverage level between -105 dBm and -115 dBm. A label of 'Limited' would emphasise the service limitations that may be present at this coverage level, and encourage a conservative approach to interpreting coverage map information where service reliability may be limited.

5 Subparagraphs 7(1)(b)(i),(v) of the *Telecommunications (Mobile Network Coverage Maps) Direction 2025* (**Coverage Maps Direction**).

6 On page 9.

2.2 The descriptions of coverage levels should include clearer examples of what a service can achieve

We understand that when considering these descriptions there is a tension between some of the Standard's key objectives. On one hand, it is important coverage maps are simple, easy to understand, and reasonably comparable across the industry.[7] This will require a level of generalisation in coverage level descriptions to account for the many variables that can affect coverage. However, it is also important the descriptions are sufficiently meaningful for consumers to derive a reasonable understanding of the user experience on the ground.[8] Accordingly, the Coverage Maps Direction provides the objective of the visual representation of reasonably expected coverage levels being 'accompanied by *plain language descriptions of indicative end-user activities* at each level in a given geographical location' (emphasis ours).[9]

We recommend the ACMA include more detailed and tangible explanations of the kinds of tasks users can expect to complete using a mobile service (calls, SMS, and the use of various applications using mobile data, for example) at each of the defined coverage levels. The descriptions could also indicate the level of slow-down or dropped connectivity an end-user can expect when completing those tasks. It is important consumers have useful information about the likely functionality of calling and messaging apps, as for some consumers, these are increasingly supplementing SMS and traditional voice calls.[10] These tangible explanations are particularly important for the two 'middle' coverage levels labelled 'Moderate' and 'Useable', where coverage is deemed to be available but is less than ideal.

Case Study – Chloe* relied on an inaccurate coverage map when purchasing a mobile service

Chloe lives in a rural, hilly area in NSW. She planned to purchase a new mobile service from ArcTel, but was conscious that she might have poor mobile coverage where she lives. Before buying the service, she double-checked ArcTel's coverage maps and confirmed she should receive 4G voice and data coverage at her home.

After signing up for the service, Chloe found while her service worked in town, she had poor coverage at her home address. Her calls frequently dropped out or could not connect, and she received no data coverage. She contacted ArcTel for assistance, who said the 4G service flagged on the coverage map was only for voice calls and not data.

7 See paragraph 7(1)(a), subparagraphs 7(1)(b)(ii),(iv),(vii) of the Coverage Maps Direction.

8 See subparagraphs 7(1)(b)(i),(iii),(v),(vii) of the Coverage Maps Direction.

9 In subparagraph 7(1)(b)(iii).

10 We note the ACMA's February 2026 'How we communicate' report found Australians' use of communication apps remains high and is consistent with 2024 levels.

Chloe contacted the TIO because she felt the information on ArcTel's coverage map was misleading. Through our referral, Chloe agreed to stay with ArcTel as long as they discounted her monthly bills to reflect her diminished service.

**Names of all parties have been changed. This case study appeared in our submission to the 2024 Regional Telecommunications Review.*

3 Prescribed text describing coverage should be standardised as much as possible and include information about environmental impacts

The ACMA has asked for feedback about whether MNOs should be allowed flexibility to modify the prescribed descriptions of coverage levels or the prescribed description of coverage map limitations.

We do not support giving MNOs flexibility to alter the prescribed text in Part 2 and Part 3 of Schedule 1 unless there is a compelling justification for doing so. Tightly prescribing the text will ensure a consistent approach and support the comparability of coverage maps across the industry. It will also help ensure clarity about what MNOs are required to do to comply with the Standard's rules.

We are pleased to see the draft Standard's requirements for telcos to use the prescribed text contained in Part 3 of Schedule 1 to describe the limitations of their coverage maps. This information makes clear to readers that coverage map information applies outdoors and at ground level. Among other limitations of coverage map information, it also indicates that connecting to a mobile network from inside a building with thick walls or few windows can have a detrimental effect on coverage. Requiring telcos to use the same description of these factors will ensure a consistent experience across the industry and help consumers to understand the relevant limitations.

The information in Part 3 of Schedule 1 could be improved by including additional information about how geography can affect coverage. For example, the information could provide an explanation of the effects of local hills or large bodies of water. It may also be beneficial to specify that matters other than physical objects can affect coverage, such as radio-frequency interference. We acknowledge there is a need for balance between providing a helpful level of information about the limitations of coverage maps, and ensuring they are easily digestible. The limitations of coverage maps should be explained in plain English.

4 We support requiring telcos to review and update their coverage maps every three months, subject to a future review

We are pleased to see the ACMA has included in the Coverage Maps Standard a mandatory three-month interval for telcos to review their mobile coverage and update coverage maps if necessary.[11] Prescribing a mandatory interval for these reviews will help ensure MNOs' coverage maps are kept reasonably up to date and account for recent changes in their networks.

In our experience, the level of coverage available to consumers in a geographical area can sometimes change significantly over time. This is particularly the case when the relevant MNO recalibrates its mobile network configuration or (for example) introduces a new mobile technology type. Following the shutdown of Australia's 3G mobile networks in 2024,[12] we heard from some consumers that their mobile coverage had deteriorated. Sometimes, consumers tell us their coverage deteriorated gradually over time. On other occasions, we hear that the coverage in a consumer's area has changed rapidly.

A three-month interval is a good starting point in striking a reasonable balance between keeping coverage maps up to date and avoiding undue administrative burden for MNOs. We recommend the ACMA monitor how the proposed three-month interval operates in practice, and review it after the Standard has been in place for a reasonable period (such as 18 – 24 months), to ensure it strikes the right balance.

Case Study – Alice's* mobile coverage deteriorated suddenly, shortly after they signed up for their service

Alice told us that when they first signed up for their Tui Telco mobile service, its coverage map showed they would get an excellent level of service at their address in suburban Victoria. Initially, their mobile service worked well. However, a few months after Alice signed up for the service, something changed that caused Alice's coverage to deteriorate suddenly and significantly. Alice told us they thought Tui Telco had moved the local mobile tower or shut it down completely.

As a result of the change in their coverage, Alice was no longer able to use their mobile service inside their house, only in their backyard.

**Names of all parties have been changed*.

11 In subsection 9(3).

12 Telstra and Optus shut down their 3G mobile networks in October 2024. TPG/Vodafone shut down its 3G network in January 2024.

5 MVNOs' coverage maps should accurately reflect the coverage available to *their* customers

The Standard should be strengthened by explicitly clarifying that the information a MNO must give to a MVNO under section 10 must reflect the mobile coverage that will be available to that MVNO's customers.

To ensure consistency in the consumer experience across the industry, it is important that accurate and comparable coverage information is available for MVNOs' mobile services as well as for MNOs' mobile services. We support the ACMA's approach to coverage maps for MVNOs' services, where a MVNO must publish its own coverage map, which is substantially the same as a coverage map provided to it by the relevant MNO, for the purpose of providing coverage maps to the MVNO's customers. This is a sensible approach, as MNOs own Australia's mobile infrastructure and are therefore in the best position to create coverage maps.

Depending on the particulars of a MNO's wholesale agreement with the MVNOs using its network, the coverage available to those MVNOs' customers may be different to the coverage available to the MNO's own customers.[13] Where this occurs, it is important the MVNOs' coverage maps accurately reflect the coverage available to their own customers, rather than being a direct copy of the MNO's coverage map.

6 MNOs must disclose known coverage blackspots and areas where their networks are regularly congested

We recommend that the ACMA amend the draft Standard to include reasonable requirements for coverage maps to disclose known blackspots and congested areas. This would support the objectives set out in subparagraphs 7(1)(b)(i) and (vii) of the Coverage Maps Direction, as it would increase the likelihood of coverage maps representing an end-user's on-ground experience, and would also improve the general utility of coverage maps.

[13] For example, this webpage on the Telstra Wholesale website says the Telstra Wholesale Mobile Network uses 'part of' the Telstra mobile network.

In our experience, when a telco's coverage map does not reflect the coverage available to a consumer, this can be for a variety of reasons. In our September 2025 Universal Services Policy Position Statement, we highlighted that this can sometimes occur because a telco's mobile coverage map does not disclose areas of network congestion or mobile coverage blackspots.[14]

The presence of a coverage blackspot may mean that the particular geographical area where a consumer wants to use their mobile service will not receive coverage, even though the relevant coverage map may show generally good coverage in the area. Similarly, in areas where a mobile network experiences regular congestion, end-users often experience patchy or unusable service, even though their telco's coverage map might show they should receive a higher level of coverage. Sometimes congestion problems occur as a community grows and the demands on the local towers increase. Other communities may experience seasonal congestion, for example when the population of a holiday destination grows during tourist season.

Rosie Telco's coverage map did not show the full picture about its mobile coverage at Heather's* address

Heather lives around 30 kilometres from a major Australian city. In late 2024, Heather complained to our office saying her local mobile coverage with Rosie Telco had deteriorated significantly over the last few years. At the time she lodged her complaint, Heather was no longer able to reliably access mobile data inside or outside her home, and mobile calls frequently dropped out. Despite this, Rosie Telco's mobile coverage map had continued to show (and in 2026 still shows) that her area should have good 5G coverage.

When we referred Heather's complaint to Rosie Telco, it told her that the local mobile tower was regularly congested, which reduced the performance of her service. It also advised there would be areas where its coverage map shows coverage is available, but a device would not be able to connect to its network.

Rosie Telco told Heather that while it had plans to improve the local mobile infrastructure, there was no set timeframe for this. It suggested she buy a signal booster antenna to improve her coverage (at her own cost). Heather ultimately accepted an offer of credit on her Rosie Telco account to resolve her complaint.

**Names of all parties have been changed.*

[14] On page 4.

We support reasonable requirements for MNOs to disclose known blackspots and regularly congested areas in their coverage maps (including the maps they provide to MVNOs for use with their own services). In our view, where a MNO is aware of coverage blackspots that affect its network and there is no compelling reason not to disclose the blackspots, it is reasonable for information about those blackspots to be shared with consumers. Similarly, information about whether a mobile network is regularly congested would be useful to consumers when comparing services and would help them understand what to expect if they intend to use their service in an affected area.

7 Telcos must provide direct links to their coverage maps on the homepages of their websites

We recommend changes to the draft Standard so that a MNO or MNVO is required to publish a direct link to its coverage map in a prominent position on the homepage of its website. These requirements could be modelled on similar provisions in other instruments, such as subsections 8(3)-(4) of the *Telecommunications (Consumer Complaints Handling) Industry Standard 2018*.

We welcome the requirements in subsections 8(3) and 12(3) of the draft Standard, which require MNOs and MVNOs respectively to publish their coverage maps prominently in clearly labelled sections of their websites. These provisions also require the relevant sections of telcos' websites to be 'easy to find', and to be accessible by any person without needing to provide login details or contact information. These rules will go some way to ensuring telcos' coverage maps are reasonably accessible to consumers. The obligation should be improved by including explicit requirements for telcos to provide direct links to their coverage maps on the homepages of their websites.

In our experience, where telcos are required to publish documents or information on their websites, we sometimes see examples of websites where the information is published in less prominent locations, where users may have difficulty locating them. For example, sometimes they might structure websites so that although a homepage may include a link from which a document or information can be accessed, users must navigate through a potentially confusing series of nested links before reaching the relevant information.

We expect most MNOs and MVNOs would structure their websites to reflect the broader intent of subsections 8(3) and 12(3) by publishing their coverage maps in sensible and prominent locations so they are easy to find. However, including more prescriptive requirements for websites to include links to the coverage maps would ensure consistency across the industry.

8 The coverage mapping methodology could be supplemented with in-field measurement information in future

We support the ACMA's initial approach to standardising mobile coverage mapping methodologies across the industry, which will require all MNOs to use predictive modelling based on a defined set of assumptions. This will help to ensure a reasonably consistent approach between MNOs and support the comparability of coverage maps. A predictive modelling methodology also has the benefit of being more easily reproduceable in different locations (without having to account for differences in field testing conditions, for example).

However, while we support the use of predictive modelling as the initial basis for coverage maps, predictive modelling does have limitations. As the ACMA highlighted in its consultation paper, predictive modelling may not fully reflect real-world conditions or the user experience on the ground in a given location.[15]

The limitations of predictive modelling could be mitigated by supplementing it with elements of in-field testing. As the ACMA points out in its consultation paper, the National Audit of Mobile Coverage is based on in-field testing, and provides a complementary picture of Australia's mobile coverage. The ACMA has also observed some comparable international jurisdictions supplement their predictive modelling methodologies with in-field measurements.[16]

We encourage the ACMA to consider how in-field measurements could be used to augment mobile coverage maps created under the Standard in future. Once the Standard has been in place for an initial period of time (such as 18 – 24 months), it may be easier for the ACMA to assess how in-field testing could reasonably be used to improve mobile coverage maps.

15 On pages 6-7.

16 See the ACMA's Consultation Paper, page 8.