



Telecommunications  
Industry  
Ombudsman

# TIO submission to the Select Committee on Productivity in Australia

March 2026

## Executive Summary

Thank you for the opportunity to provide insights to inform the Select Committee on Productivity in Australia.

The Telecommunications Industry Ombudsman (**TIO**) is the independent dispute resolution scheme for the telecommunications sector. Telecommunications service providers, including carriers and eligible carriage service providers, are required by law to be members of, and fund, the dispute resolution scheme administered by the TIO.

Telecommunications are a key driver of productivity, providing the connectivity that enables people to work efficiently, collaborate in real time, and access digital tools and markets. Reliable and affordable communications reduce downtime, support flexible work, and allow businesses and public services to operate at scale. As economic activity becomes increasingly digital, strong telecommunications networks are essential to workforce efficiency, business competitiveness, and overall economic performance.

Our submission argues that modern, reliable telecommunications and effective dispute resolution for both traditional and digital forms of communication are foundational inputs to Australia's productivity. We recommend modernisation of the telecommunications regulatory framework to better reflect how Australians now use essential services, including updating the universal services framework and consolidating and directly regulating core consumer protections.

Our submission also highlights the growing productivity costs arising from unresolved digital platform disputes and recommends establishing a digital platform ombudsman—by expanding the TIO's jurisdiction—to provide efficient, accessible redress, lift system-wide standards and support trust and confidence in the digital economy.

Technological advancements in digital platforms and services have outpaced regulation and consumer safeguards. The opportunity for growth and productivity gains is high, but the potential harms to users when things go wrong are correspondingly severe. Unresolved complaints and opaque resolution processes waste time and resources and reduce trust in the digital economy. A growing number of users are contacting the TIO for help with digital platform complaints.

In line with recommendations from the ACCC, the Statutory Review of the Online Safety Act, and consumer groups including ACCAN and CHOICE, we are calling for the establishment of a digital platform ombudsman by expanding the TIO's jurisdiction. This would strengthen trust and confidence in the digital economy, creating necessary conditions for continued productivity growth.



## Table of Contents

<b>Executive Summary</b>	<b>2</b>
<b>1 Acronyms and abbreviations</b>	<b>4</b>
<b>2 Access to reliable telecommunications services is vital to productivity</b>	<b>5</b>
<b>3 Australia needs a modern telecommunications regulatory framework</b>	<b>6</b>
3.1 The universal services framework should be updated to reflect how Australians use essential telco services	6
3.2 Essential telecommunication consumer protections should be directly regulated and consolidated	8
<b>4 Stronger consumer safeguards builds trust and confidence in digital platforms</b>	<b>9</b>
4.1 The cost of doing nothing is high	10
4.2 Fair and transparent dispute resolution is necessary to strengthen user trust and confidence in digital platforms	12



# 1 Acronyms and abbreviations

<b>ACCC</b>	Australian Competition and Consumer Commission
<b>ACCAN</b>	Australian Communications and Consumer Action Network
<b>ACMA</b>	Australian Communications and Media Authority
<b>CSG</b>	Telecommunications (Customer Service Guarantee) Standard 2011
<b>EDR</b>	External Dispute Resolution
<b>SIP</b>	Statutory Infrastructure Provider
<b>TIO</b>	Telecommunications Industry Ombudsman
<b>USO</b>	Universal Service Obligation

## 2 Access to reliable telecommunications services is vital to productivity

Telecommunications services underpin how people work, businesses operate, and services are delivered across the economy.

Reliable connectivity enables efficient communication, supports remote and flexible work, allows businesses to adopt digital tools and technologies, and connects consumers to goods, services and information in real time. From small businesses relying on mobile and broadband services to reach customers, to critical sectors such as health, education, emergency services and transport, telecommunications infrastructure is a foundational input to economic activity.

When services are reliable and accessible, they reduce downtime, improve workforce participation, and support innovation and growth. When they are not, productivity suffers through lost time, disrupted operations and reduced trust in essential services.

Complaints received by our office continue to reflect the importance of mobile services to the Australian community. Our 2024-25 Annual Report shows mobile remains the most complained-about service type, representing at least 44.7% of all complaints to our office in FY25.<sup>1</sup> Complaints marked with our 'poor mobile coverage' keyword increased 22.7% year on year in FY25 (to a total of 3,141 complaints), driven in part by complaints relating to the October 2024 shutdown of Australia's remaining 3G mobile networks.

Our complaints also reflect the importance of consumers having reliable access to internet services. Our 2024-25 Annual Report shows complaints marked with the 'internet' service type that were about intermittent service or service dropouts increased 25.8% year on year (to a total of 4,437 complaints). Complaints marked with the 'internet' service type and our 'No Service' keyword increased 8.7% (to a total of 3,766 complaints).

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<sup>1</sup> For reporting purposes, we categorise complaints to our office 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.

## 3 Australia needs a modern telecommunications regulatory framework

### 3.1 The universal services framework should be updated to reflect how Australians use essential telco services

The Productivity Commission final report for its inquiry into *Creating a more dynamic and resilient economy* notes that, despite the sector experiencing ongoing rapid change in response to technological advances, telecommunications regulation has not faced a root-and-branch review for some years.<sup>2</sup>

The current telecommunications regulatory framework has not kept pace with the needs and expectations of Australian consumers, or with the realities of Australia's modern wholesale environment. This has resulted in some consumers not having access to the telco services they need, and (in some cases) inefficient use of Australia's telecommunications infrastructure.

While the Universal Service Obligation (USO) scheme remains a key safeguard for consumers who rely on landline services across Australia, the scheme has gradually become outdated as other service types (mobile and internet) have become more prominent.

In addition to the USO, the telco sector is subject to separate, but important, schemes to ensure fair access to essential services:

- The Statutory Infrastructure Provider (**SIP**) regime: Sitting alongside the USO, the SIP regime ensures retail service providers have wholesale access to high-speed broadband services across Australia, for the purpose of supplying those services to their own customers. It also requires those services to be capable of meeting or exceeding certain minimum standards for download and upload speed and voice service capability. However, there are currently no benchmarks and standards in place that address other aspects of internet service quality (such as latency), the reliability of SIP internet services or the consumer's recourse when services fail to meet those standards.<sup>3</sup>

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<sup>2</sup> Productivity Commission (2025) [Creating a more dynamic and resilient economy - Public inquiry](#)

<sup>3</sup> The *Telecommunications Act 1997* (Cth) provides that the Minister may, by legislative instrument, make standards, rules or benchmarks and that SIPs must comply with those standards, rules or benchmarks.



- The Customer Service Guarantee (the **CSG**): A long-standing consumer protection that sets minimum service standards for fixed telephone (landline) services. Its purpose is to ensure telcos connect and repair services within reasonable timeframes, however it is limited to landline services, and many larger telcos require their customers to agree to waive their CSG rights. In 2023 the government consulted with stakeholders as part of the thematic review of the CSG.<sup>4</sup>

In addition, the Triple Zero Custodian has commenced a review of Triple Zero legislation and rules, which will include looking at the feasibility of mobile service standards in relation to Triple Zero.<sup>5</sup>

The consolidation of abovementioned schemes could create consistent obligations and standards across all service types, which will reduce the overall complexity for telcos and consumers, and ensure the regulations remain relevant as new technologies emerge. Clearer and more consistent obligations across all service types could, in turn, reduce the number of issues experienced by consumers and the number of complaints received by our office.

Last year the TIO published its [Policy Position Statement](#) on the provision of universal telecommunications services to Australians.<sup>6</sup> In our statement, we called for the modernisation of the telco regulatory framework, incorporating the following principles:

- Connectivity** – The framework should ensure Australians can connect with the people and services they need for safety, connection and participation in society. This means the framework should include all communications services Australians rely on to stay connected and keep safe. That includes at a minimum a framework that covers voice and broadband services at Australians' homes and places of business. The framework should also recognise the increasingly essential nature of mobile services.
- Accessibility** – It is crucial Australians can depend on the framework to provide access to the telco services they need. This means the framework should seek to remove barriers to accessing universal services and ensure baseline services are available and affordable.
- Reliability** – An effective framework is one Australians can rely on to provide the services they need. This means the framework should include clear and enforceable service and quality standards for voice and broadband services, including reasonable standards for mobile services (including clear and transparent coverage information). It also means consumers should be entitled to compensation when telcos do not meet those standards.

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<sup>4</sup> Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (2023) [Thematic Review of the Customer Service Guarantee \(CSG\)](#)

<sup>5</sup> Department of Infrastructure, Transport, regional Development, Communications, Sport and the Arts (2026) [Triple Zero Legislative and Regulatory Review](#)

<sup>6</sup> TIO (2025) [Universal Services Policy Position Statement](#)



- d. **Adaptability** – For the framework to remain relevant to the evolving communications needs of Australians, it needs to be able to adapt as those needs change. Being adaptable also means having the flexibility to respond to new technologies as they emerge and being fit-for-purpose in the modern wholesale environment. A modern framework should be technology-neutral and seek to use the most efficient and effective technologies to deliver universal services, as needed from time to time.

Ultimately, a modernised and consolidated telecommunications framework will not only streamline protections and obligations but also better equip Australians to access reliable and essential services as the sector continues to evolve.

### **Recommendation 1: Review of the telecommunication universal services framework**

That government review and modernise the universal services framework to ensure that Australians can access the essential services they need to support increased productivity, with clear obligations and recourse when reliability and service standards are not met.

## **3.2 Essential telecommunication consumer protections should be directly regulated and consolidated**

Trust and confidence in the telecommunications sector remain fragile, with recent survey evidence pointing to persistent consumer concern about provider behaviour and outcomes.<sup>7</sup> In this context, strengthening trust in telecommunications requires a shift away from fragmented, industry-led protections toward a consolidated, directly regulated framework that provides clear minimum standards, consistent enforcement and visible accountability—features that consumers associate with fairness, reliability and confidence in other essential services.

Telecommunications services are essential services, yet Australia’s consumer protection framework remains fragmented. Telcos are subject to the Telecommunications Consumer Protections Code, which is required under the *Telecommunications Act 1997* (Cth) to be reviewed every five years. The most recent review commenced in 2023 and has not reached an outcome.<sup>8</sup> In addition, telcos are subject to directly enforceable protections made by the ACMA, including standards covering complaints handling, financial hardship, domestic, family and sexual violence, identity verification and customer authentication.

As a result, key telco protections are dispersed across multiple instruments, creating complexity for consumers, providers and regulators and increasing the risk of inconsistent application and

<sup>7</sup> Roy Morgan (2025) [Telecommunications industry is Australia’s second most distrusted and Optus is the most distrusted brand](#)

<sup>8</sup> Australian Telecommunications Alliance (2026) [TCP Code Review 2024-2025](#)

enforcement. We support consolidation of all key consumer protections into a single instrument made by government or the ACMA. Such an instrument would be developed following consultation with industry, consumer groups and other relevant bodies like the TIO.

A stronger emphasis on direct regulation—where minimum consumer protections are set by government and regulators rather than industry—would better reflect the public interest in how essential services are delivered (and is currently the approach for the energy and water).

Importantly, consolidation and direct regulation can reduce regulatory burden rather than increase it. Replacing overlapping codes and standards with a single, coherent regulatory instrument would improve clarity, reduce duplication and support more efficient compliance. The Productivity Commission has highlighted the productivity impacts of unnecessary regulatory complexity and duplication.<sup>9</sup>

### **Recommendation 2: Review and modernise essential consumer protections for telecommunications consumers**

The government or the ACMA review the telecommunications consumer protection framework, aiming to combine all key essential consumer protections into one regulatory document to support increased trust and confidence while reducing regulatory burden on telcos. Highly technical matters outside of essential consumer protections should still be subject to Industry Codes.

## **4 Stronger consumer safeguards build trust and confidence in digital platforms**

Rapid developments in digital platforms and services have transformed the way Australians live, work and stay connected and informed. In 2026, 98% of Australian adults use at least one communication or social media website or app for personal purposes, and Australians use an average of five platforms each.<sup>10</sup> Digital platforms offer Australian businesses a cost-effective way of doing business and accessing broader consumer markets. Social media is a key source of information about brands and products for more than half of users aged 16 to 64, making it an important marketing channel for businesses.<sup>11</sup> They are also major drivers of productivity growth in our economy.<sup>12</sup>

<sup>9</sup> Productivity Commission (2025) [Inquiry report - Creating a more dynamic and resilient economy](#)

<sup>10</sup> ACMA (2026) [How we communicate - Executive summary and key findings.pdf](#) p.2

<sup>11</sup> We are social (2024) [Digital 2024 Australia highlights a power shift towards social media](#)

<sup>12</sup> ACCC (2025) [Key findings on the final report of the Digital Platform Services Inquiry 2020-25](#)

However, when things go wrong, there are limited options for digital platform users to get help. As digital technology continues to play a greater role in the way Australians live and work, more users are approaching the TIO with complaints relating to digital platforms, which are currently outside of our jurisdiction. Between 2023 and 2025, the TIO received 1,780 digital platform complaints.<sup>13</sup> Over 70% of these complaints related to account lockouts, fees and charge disputes, and faulty products and services. Across all complaint types and platforms, digital platform users who approached the TIO for help consistently report difficulty accessing the support they need to fix their problem.<sup>14</sup>

### Case study: Accidental account lockout

Sandy's\* business page on social media is linked to her personal account, which she uses to manage advertising and customer engagement. Her personal account was disabled without warning, leaving her unable to reach customers through the business page. When she tried to challenge the lockout, the social media company's response went to the blocked account, and she could find no other way to get help from them.

*\*Names of all parties have been changed.*

Consumer trust in digital platforms to resolve complaints and help their consumers is low. ACCAN research found that 60% of consumers surveyed feel there is not much they can do when something goes wrong online. Almost three in four (74%) of people in Australia agree it needs to be easier to make a complaint and resolve their problem when dealing with digital platforms.<sup>15</sup>

## 4.1 The cost of doing nothing is high

When issues are left unresolved, the financial and emotional impact on digital platforms users can have flow-on effects to people's health, wellbeing and livelihoods. For small business owners who are cut off from their main platform for advertising and consumer engagement, the reputational damage and lost revenue can be severe.

<sup>13</sup> TIO (2026) [TIO Q2 Complaints data insights report 2026.pdf](#) p.19

<sup>14</sup> TIO (2025) [TIO Digital platforms complaints insights report December 2025.pdf](#) p.12

<sup>15</sup> ACCAN (2021) [Digital Platforms and the Consumer Experience in Australia](#)



### Case study: Jacob's\* small business page was hacked

Jacob's social media account was hacked, and the account recovery details changed. He operates his business primarily through social media pages linked to his account, which is his main source of income. After he was hacked, he could no longer contact customers or promote his products. The hacker asked for a ransom of \$5,000 to recover the account. Jacob tried to contact the social media platform for help but received no response. He was worried about his business staying afloat, so he contacted the TIO.

*\*Names of all parties have been changed.*

In a feasibility study undertaken by the Australian government in 2021, the digital dispute resolution landscape cost the economy an estimated \$4.2 billion in lost time in 2020, of which \$3.7 billion was borne by consumers and small businesses. This is in addition to the \$188 million incurred in 2020 in direct financial losses by small businesses (\$101 million) and consumers (\$87 million).<sup>16</sup>

The ACCC's preliminary report into Google, Facebook and Australian news and advertising in late 2018 detailed the substantial implications of digital platforms holding a dominant concentration of market power.<sup>17</sup> Among these is the incentive for digital giants to preference their own commercial interests, risking consumers' ability to make informed decisions and stifling healthy competition in the market. The ACCC urged the government to mitigate the risks created by digital giants having unchecked market influence and vast access to consumer data. Treasury's proposed digital competition regime aims to address these risks, but it has yet to be implemented.

*"I know you can't do anything to help but I want it noted on file because if there are other people reporting similar issues with the company then they need to be held accountable... they are such a big company that no complaint matters, they don't care about one person."*

*Digital platform user complaint to the TIO*

<sup>16</sup> Accenture (2021) [FOI 23-037](#) p.5

<sup>17</sup> ACCC (2018) [ACCC releases preliminary report into Google, Facebook and Australian news and advertising](#)

## 4.2 Fair and transparent dispute resolution is necessary to strengthen user trust and confidence in digital platforms

Trust and confidence are essential for well-functioning markets. The ACCC's 5-year inquiry into digital platforms highlighted the need for appropriate regulation and dispute resolution to address market power imbalances and to support trust and confidence in the digital economy.<sup>18</sup> This call was echoed by the Statutory Review of the *Online Safety Act 2021* and consumer advocacy groups ACCAN and CHOICE.

An external dispute resolution (EDR) scheme would provide an efficient and effective way to provide individual redress for consumers, as well as lifting the standard of the industry through working with digital platforms on systemic issues causing consumer harm. In sectors where an effective EDR scheme is established, it has proven instrumental in identifying patterns of harm, informing policy, and driving accountability. Not only do EDR schemes resolve individual complaints, but they provide regulators and government with critical insights into consumer experiences and emerging issues, enabling timely and targeted interventions.

Expanding the jurisdiction of existing EDR schemes is the most efficient and scalable approach to strengthening these consumer protections. Designating the TIO to handle digital platforms complaints reduces unnecessary duplication and consumer confusion about where to take a complaint. This provides a clear and efficient solution for consumers, regulators and industry.

### **Recommendation 3: The Government accept the ACCC's recommendation to progress a digital platform ombudsman**

The government should commit to establishing a digital platform ombudsman to resolve complaints by expanding the jurisdiction of the Telecommunications Industry Ombudsman to handle both telecommunications and digital platform complaints.

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<sup>18</sup> ACCC (2025) [Digital platform services inquiry. Final report](#)