

8th November 2021



Universal Service Guarantee Taskforce
Department of Infrastructure, Transport, Regional Development and Communications
GPO Box 594
Canberra ACT 2601
Via email: USG@infrastructure.gov.au

Re: Telecommunications (Carrier Licence Conditions – Telstra Corporation Limited) Amendment (Regional Service Information) Instrument 2021

ACCAN thanks the Department for the opportunity to contribute to its consultation on the proposed amendments to Telstra's carrier licence conditions. ACCAN has been calling for improvements to Telstra's Network Reliability Framework for some time,¹ and is very supportive of the proposed reporting rules on Telstra in relation to voice services provided under the Universal Service Obligation regime.

Consumers residing outside of NBN's fixed line footprint are heavily reliant on voice services provided over Telstra's network. Residents in regional, rural and remote (RRR) Australia often live in mobile black spots or entirely outside of mobile coverage areas. These consumers may receive an NBN Sky Muster Satellite connection which can be weather affected, meaning that the voice services supplied over Telstra's network are often the only form of communication available. It is a matter of safety that this form of communication remains available at all times. Without sufficient reporting, it is difficult to assess Telstra's performance when it comes to the reliability of these services. Anecdotally we have heard from consumers in RRR areas who experience significant delays to fault rectification, and as a consequence they are left without forms of communication for substantial amounts of time.

Case study: ACCAN was contacted a few months ago by a group of community organisations that provide a variety of services to the greater Tablelands region in Far North Queensland. Their clients range from families at risk of entering child protection services, individuals with substance abuse issues, seniors, and people experiencing domestic and family violence or homelessness. The communities they work with often reside in mobile black spots and the copper phone lines have degraded. They report that the telephone lines are attached to barbed wire fences and are not being weatherproofed which is particularly problematic given the high volume of rainfall the region receives. The community organisations are extremely concerned because their clients are uncontactable which can prevent them from accessing the services they need.

Telstra has a Universal Service Obligation to ensure standard telephone services are reasonably accessible to all people in Australia, wherever they work or live. Currently Telstra's reporting

¹https://accan.org.au/files/Submissions/ACCAN%20submission%20on%20Telstra%20CLC_21%20February%202019.pdf

Australian Communications Consumer Action Network (ACCAN)
Australia's peak body representing communications consumers

PO Box A1158, Sydney South NSW 1235

Tel: (02) 9288 4000

www.accan.org.au | info@accan.org.au | [twitter: @ACCAN_AU](https://twitter.com/ACCAN_AU) | www.facebook.com/accanau

requirements are opaque and do not allow for sufficient examination to understand whether Telstra is meeting its obligations to ensure connections and faults are undertaken and repaired within a reasonable time. For example, the Network Reliability Framework provides information at an aggregate level, yet we cannot see how faults are distributed within regions or the distribution of repair times. The proposed instrument will provide a much needed evidence base of Telstra's performance in delivering the Universal Service Obligation. Furthermore, deregulatory changes in recent years have resulted in changes to the ACMA's annual reporting on Customer Service Guarantee (CSG) services contributing to a reduction in transparency of CSG services.

ACCAN supports the proposal for a system which will allow the general public to identify which exchange service area (ESA) their service is connected to. Providing consumers with the ability to understand how the network is performing in their area will be valued by consumers. It is important that this system is simple, free and easy to use. However we are concerned regarding the feature which will allow an individual to find the relevant ESA based on a telephone number. Depending on the size of the ESA, this could provide quite a specific location such as a township with a small population. This raises privacy and safety concerns, for example if it provides opportunity for perpetrators of domestic and family violence to find the area where a survivor resides based off their telephone number. Whilst ACCAN would like to see the system implemented, there should be further consideration of the benefits of using a phone number to find the relevant ESA, and whether simply providing a relevant address is adequate.

In addition, the proposed amendment should be strengthened further by:

- requiring Telstra to make public the number and amount of CSG compensation payments made to customers each quarter. This data is no longer reported by the ACMA in their Annual Communications Report, however ACCAN considers that there is benefit from ensuring this information remains public in order to maintain transparency of the CSG standard.
- adding the requirement that Telstra make public the number of complaints by complaint category under section 13C of the exposure draft. We note that this information will already be collected and reported to the ACMA and the Department as required in section 13D. Making this information public will drive public accountability and assist ACCAN in identifying types of issues consumers are facing, ultimately aiding us to advocate for improved services.
- including in section 13D of the exposure draft, table 10 the requirement to provide information on the number of complaints which are escalated to the TIO. This would provide greater insight into how well Telstra is responding to the complaints made on reportable services.

Overall ACCAN welcomes the proposed amendment. If you have any further questions regarding our submission, please do not hesitate to contact me.

Sincerely,

