

26 March 2026

Universal Services Branch
Department of Infrastructure, Transport, Regional Development,
Communications and the Arts
GPO Box 594
Canberra ACT 2601

Submitted online via <https://www.infrastructure.gov.au/have-your-say/extending-customer-service-guarantee-instruments>

Dear Universal Services Branch,

Extending the Customer Service Guarantee Instruments

Thank you for the opportunity to comment on the Department's consultation on *Extending the Customer Service Guarantee Instruments*.

The Customer Service Guarantee (**CSG**) instruments are an important consumer protection for users of fixed-line telephone services. Our office regularly handles complaints from consumers who experience delays with the connection or repair of these services. We support the extension of the CSG instruments as a temporary measure but urge government to continue its review to modernise the CSG scheme and develop standards for Statutory Infrastructure Provider (**SIP**) internet services.

1. The CSG instruments should be extended

We support the continued existence of the CSG instruments as an essential consumer protection. While we acknowledge that fixed-line telephone services are less prevalent than they were when the CSG scheme was first introduced, they remain an important service type for many consumers. We often hear from consumers who have maintained a fixed-line telephone service because they live in locations that have no access to reliable alternative services, or because they have medical risks or a business reliance on these services. Accordingly, the timely connection and repair of fixed-line telephone services continue to be important issues for consumers.

The CSG instruments assist our office when handling complaints about connection delays and faults. They serve as an incentive for service providers to connect and restore services quickly, or to flag and remediate any potential delays in those activities. We regularly refer to the CSG Standard to determine whether consumers are eligible for compensation and whether providers have calculated compensation correctly.

We recommend the CSG scheme continues to be maintained until such time as it is replaced with a modernised scheme of service guarantees for a wider range of telco services.

2. We support a broader review of the telco framework, including the CSG scheme

As telecommunications is now widely accepted as an essential service, it is timely for government to review the telecommunications regulatory framework more broadly, to ensure it is fit for purpose and meeting the needs of Australians.

Telcos are subject to complex and sometimes overlapping obligations, often split across different technology types. Meanwhile consumers, regardless of whether they are using fixed-line, wireless internet, or mobile services, expect essential telecommunications to meet their reasonable service expectations, and to have access to redress when minimum service standards are not met.

As we have stated in our submissions to the Department on the *Thematic Review of the CSG*¹ and the *Draft CSG Direction to the ACMA*², and in our [policy position paper on Universal Services](#), there remains a need for an updated scheme of consumer guarantees that aligns with contemporary views on essential telecommunications services and reflects how consumers use and rely on fixed-line telephone and internet services.

In the short term, we support the development of service standards for SIP internet services as a matter of priority in addition to progress on the CSG thematic review. Like the CSG scheme, a SIP service standard should provide for consumers to be compensated directly when telcos do not meet the required standards. We see complaints where telcos tell consumers they must wait significant periods of time for their internet service to be connected or repaired. A SIP service standard would incentivise telcos to complete these connections and repairs in a timely manner.

In the longer term, we support a review and potential consolidation of the varying obligations that underpin the provision of essential telecommunications services, in line with our Universal Services Policy Position Paper. This would include reviewing the Universal Services Obligation, the CSG scheme, and the SIP regime, as well as considering any outcomes of the Triple Zero Custodian's review examining legislation and regulation relating to Triple Zero (such as potential minimum mobile performance standards).

We look forward to the outcome of this consultation and to continuing to work with the Department on the future of the CSG Instruments.

Yours sincerely

Cynthia Gebert

Telecommunications Industry Ombudsman

¹ [TIO Submission to the Thematic Review of the CSG – March 2023](#)

² [TIO Submission to the Draft CSG Direction to the ACMA – July 2023](#)