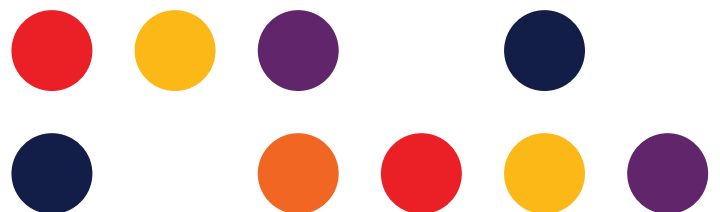


# Extending the Customer Service Guarantee instruments

TPG Telecom submission to the DITRDCA

March 2026

Public submission



## Submission

---

TPG Telecom (**TPG**) welcomes the opportunity to comment on the Government's proposal to extend existing Customer Service Guarantee (**CSG**) instruments for three years. TPG reiterates feedback provided to the 2023 Thematic review of the CSG that it is no longer fit for purpose. Given time constraints, it may be necessary to extend it for a period in its current form. However, this should be taken in conjunction with a firm commitment to reform the CSG into an instrument reflective of the current telecommunications market.

The 2017 Productivity Commission inquiry into the Universal Service Obligation (**USO**) found the deployment of NBN infrastructure made the relevance of the CSG questionable. It is notable that almost a decade on, limited changes have been made to that instrument. As such, much of TPG's feedback remains the same as our feedback to the 2023 Thematic review of the CSG.<sup>1</sup> Of note, TPG recommended:

- The CSG should continue to apply to Telstra, given their USO commitments. This should also apply to USO services supplied over the 4G network.
- The CSG should be renamed to reflect that it is a voice-only obligation. The current name is likely to cause customer confusion given its limited scope.
- The USO should be reviewed and modernised, as it is no longer fit for purpose.
- The CSG should not be extended to broadband services, given they are already subject to regulation under the Statutory Infrastructure Provider (**SIP**) regime.

TPG has no strong objection to extending the CSG for another 3 years, as long as the current CSG waiver regime remains in place to support TPG's existing services and voice products. However, we believe there should be a firm commitment to reform the CSG to better reflect the current communications landscape. This should be conducted in conjunction with a wider overhaul of the USO. Overhauling these two instruments is well overdue.

TPG has for some time been advocating for overhauling the regulatory instruments relating to guaranteed provision of communications services including the USO and CSG. Our positions have been made to various consultations including:

- 2024 Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (**DITRDCA**) [Funding of universal telecommunications services consultation](#) (RBS Review)
- 2024 DITRDCA [Better delivery of universal services consultation](#)
- 2024 DITRDCA *Regional Telecommunications Review* (confidential submission)

---

<sup>1</sup> See: <https://www.infrastructure.gov.au/sites/default/files/documents/csg-thematic-review--tpg-submission--redacted.pdf>

There remains a need for a widespread overhaul of both funding and customer service standards instruments to account for modern telecommunications networks and their usage. While the extension of the current CSG regime will not be of great concern to TPG, it appears the DITRDCSA is engaging in policy procrastination rather than commencing the substantive overhaul the legislative regime currently requires. The concerns expressed by TPG and other stakeholders at the 2023 review remain largely unaddressed.

TPG therefore requests the DITRDCSA create a firm timeline to commit to the phasing out of the CSG in its current form, and replacing it with an instrument that is fit for purpose in the current telecommunications environment. Such an overhaul could account for relevant upcoming legislative processes, including the NBN's Replacement Module Application (**RMA**), which encompasses baseline service standards for that network, and the Universal Outdoor Mobile Obligation (**UOMO**).