

30 July 2018

Department of Communications and the Arts
GPO Box 2154
Canberra 2601

By email: consumersafeguardsreview@communications.gov.au

Dear Sir/Madam

Consumer Safeguards Review – Part A

Thank you for your time in meeting with our Office to discuss Part A of the Consumer Safeguard Review and, as mentioned, we support the objects of the review.

Residential communication service plans can provide exactly what some small businesses require to run their business, but small businesses then struggle to get an appropriate level of support when there is a problem (with any time offline meaning a direct loss of profits). The current need to switch to a designated business service plan to obtain timely support should not be necessary where its only purpose is to deal with service issues. As a result, there are three key matters that we believe should be addressed as part of your review:

1. *Efficient and transparent complaint handling*

Providers should have efficient and transparent internal complaint handling policies (CHPs) with a contact number clearly displayed to enable swift resolution of complaints. This should be displayed prominently on provider websites and invoices. Quick and direct remedy of complaints is vital to small business. Escalating complaints to the Telecommunications Industry Ombudsman (TIO) should be reserved for complex cases and not be a first port of call.

2. *Single point of contact*

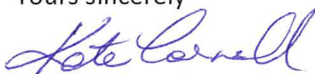
There should be a single point of contact to resolve complaints involving multiple parties in the communications supply chain. As noted, small business can be severely impacted by connectivity issues. Small businesses should be able to readily contact a person at their provider who takes responsibility for their issue without needing to deal with multiple contacts.

3. *Independent external dispute resolution*

We support the transformation of the TIO arrangements into an independent External Dispute Resolution body as outlined in Proposal 2. In doing this, there needs to be a clear timeline for resolution of disputes and a strong impetus for providers to resolve issues through their own CHPs. Mechanisms would be required to ensure providers only use this service for EDR, not complaint handling. Working closely with ACMA to gather and share monthly reporting data would also support more up-to-date analysis and redress of complaints.

In Part B of the Review, we are looking forward to discussing with you pricing, best-fit systems and contracts. In the meantime, if you would like to discuss this matter further, please contact Ms Jill Lawrence on [REDACTED] or at [REDACTED]

Yours sincerely



Kate Carnell AO

Australian Small Business and Family Enterprise Ombudsman