

From: Eric [REDACTED]
Sent: Friday, 3 August 2018 5:04 PM
To: Consumer Safeguards Review
Subject: Consumer Safeguards Review Part A Redress and Complaints Handling

The original TELECOMMUNICATIONS CONSUMER PROTECTIONS CODE C628:2012 contains adequate complaint handling process, procedures, documenting and reporting requirements that primarily only fall short due to:

A) The description of what a “complaint” actually is. All fault reports should be considered complaints.

B) The timelines for the handling of complaints - which are frequently exploited by some telecommunications providers to “encourage” complainants not to take advantage of the TIO as an independent dispute resolution avenue (by suggesting that this will delay the resolution of their complaint).

Many issues in this process would be resolved if the TCP Codes definition of a complaint that states "An initial call to report a fault or service difficulty is not a Complaint" was removed. All service faults should be regarded as complaints. These would then be included in complaint analysis that should be analysed, recorded and maintained by the ACMA.

Any discouragement of using the TIO as a third party, independent dispute resolution avenue should be able to be reported as a complaint and a breach of the Code.

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