

Thursday 26 September 2024

The Manager
National Interests Section
Australian Communications and Media Authority
By website submission: <https://www.acma.gov.au/consultations/2024-09/proposed-telecommunications-customer-communications-outages-industry-standard-2024>

To the Manager of the National Interests Section of ACMA,

I am writing on behalf of Financial Counselling Victoria (FCVic) to provide feedback on the draft Telecommunications (Customer Communications for Outages) Industry Standard 2024.

As the peak body and professional association for financial counsellors in Victoria who collectively assist more than 23,000 Victorians every year, FCVic is uniquely positioned to understand systemic issues experienced by the most vulnerable communities – which in this instance, includes those impacted by major outages and significant local outages.

Firstly, we are supportive of the prompt implementation of the Industry Standard. Mandatory, rather than voluntary, industry standards will always create a more equitable level of service for consumers, regardless of which service provider they are with.

We have a point of feedback relating to the importance of ensuring ongoing telecommunications connectedness in the immediate aftermath of a natural disaster, and the concerning inclusion of section 19, Outages during natural disasters: “A carrier or carriage service provider is not required to comply with the requirements in this Part in relation to an outage, if the sole or predominant cause of the outage is a natural disaster.”

Communication to users as detailed in the draft Industry Standard is already a 'best effort' approach with the use of the terminology 'attempt', while other communications are to carriers which may not be affected. Therefore, it is not clear why the exemption would need to be included.

We note that the Victorian Network Outage Review found that there was a critical need for communities to be and to stay connected in the immediate aftermath of an event of a natural disaster such as the February 2024 storm event, and that failure of a telecommunications connection seriously undermined public safety. We recommend that ACMA review the Final Report of the Network Outage Review (<https://engage.vic.gov.au/network-outage-review>), with regards to recommendations 8, 9 and 10 relating to the importance of telecommunications service reliability.

We recommend that section 19 from the draft Industry Standard should be removed or amended accordingly.

Thank you for your consideration of our submission. To discuss this letter further or for any further queries, please contact FCVic's Advocacy Coordinator Amanda Chan on achan@fcvic.org.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Zyl', with a horizontal line underneath.

Zyl Hovenga-Wauchope
Executive Officer
Financial Counselling Victoria