



Friday 10 August 2018

Communications Alliance

Via email: info@commsalliance.com.au

Dear Communications Alliance

RE: Telecommunications Consumer Protections (TCP) Code DR C628:2018

I write regarding the consultation for the TCP Code draft DR C628:2018 (the Draft Code). CHOICE welcomes many aspects of the Draft Code, including obligations for suppliers to resolve complaints about third party billing, a greater focus on the importance of financial hardship via the new separate chapter, and additional clarity regarding the content of the Critical Information Summary.

However, there are remaining issues for consumers that the Draft Code does not address. We encourage you to take the opportunity to address these matters in the Draft Code, to better support positive outcomes for consumers.

In particular, we note that while the Draft Code goes some way towards addressing problems with third party charges, more needs to be done to protect consumers from unwanted and unexpected bills. Unexpected third party charges on bills are a concern for consumers; requiring suppliers who include third party charges on bills to address enquiries and resolve complaints about these charges is a positive step. However, more needs to be done to address the problem at the source. Billing for third party charges should be opt in and require account holders to activate this facility with their supplier before being billed. Suppliers must not be able to bill for third party charges unless a consumer has opted in, and must not bill for these if a consumer has sent a 'stop' request to the third party service.

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Poor customer service practices are another key area where the Draft Code could go further in addressing common consumer problems and frustrations. ACCAN's 2018 report, 'Can You Hear Me?', highlights some of the most common issues experienced by consumers seeking to talk to their supplier and resolve enquiries and issues, including:

- Unacceptably long waiting periods
 - It takes on average 13 days and 2.6 contacts to resolve an enquiry or complaint (figure for resolved cases only);¹
 - The time increases to 60 days for cases that were still unresolved at the time of the survey;² and
 - Contacting a provider by phone requires waiting 1.2 hours on average before reaching the right person to speak to.³

- Poor record-keeping practices
 - 58% of respondents said they were required to provide information again on average 3.7 times.⁴
 - 26% of those had to repeat the information of their case more than five times.⁵

The Draft Code does not go far enough when it comes to addressing these specific problems. For example, 4.9.1(b) states that a supplier must monitor average wait times and acknowledge customer service enquiries 'within a reasonable minimum time in the circumstances'. This is too vague to be useful. Instead, the Draft Code should include specific benchmarks for wait times to have an enquiry resolved and to talk to or receive acknowledgment of an enquiry, similarly to the approach taken in the *Telecommunications (Consumer Complaints Handling) Industry Standard 2018*. The Draft Code should be amended to reduce time taken to resolve customer issues by adding wording to require suppliers to deal with simple enquiries within two working days, and complex inquiries within five working days. Wait times to speak to a customer service representative on the phone or via live chat should also be addressed in the Code - waiting more than an hour to speak to the right person is unacceptable, and the industry needs to have clear benchmarks set to address this. The Draft Code should require suppliers to reduce wait times on the phone to five minutes, and wait times for live chat to two minutes.

The Draft Code should also address the issue of consumers having to rehash their complaint each time they speak to a new customer service representative. This is an issue that is not exclusive to telecommunications, but is a frustration for consumers across many industries. It is also a problem that can be addressed fairly simply with better record-keeping procedures. The Draft Code should require that suppliers keep records of interactions between suppliers and customers immediately accessible to

¹ ACCAN 2018, 'Can You Hear Me?', Figures 46 and 69, http://accan.org.au/Can%20You%20Hear%20Me_v6_accessible.pdf

² Ibid, Figure 46.

³ Ibid, Figure 16.

⁴ Ibid, Figure 27.

⁵ Ibid, Figure 28.

staff dealing with these enquiries, to improve efficiency in complaints resolution and reduce consumer frustration and time wasted.

This submission is focused on the issues discussed above, but I note that CHOICE also supports the detailed submission lodged by the Australian Communications Consumer Action Network (ACCAN). CHOICE endorses ACCAN's recommendations, including those that address matters outside of the scope of CHOICE's submission.

For further information please contact CHOICE on sagar@choice.com.au

Yours sincerely,



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