

8 September 2021

The Manager
Telecommunications Performance and Regulation Section
Australian Communications and Media Authority
PO Box 13112 Law Courts
Melbourne VIC 8010

via email: TelcoPerformanceRegulation@acma.gov.au

Dear Sir/Madam

Consumer vulnerability: expectations for the telco industry - consultation 27/2021

We support the implementation of a statement of expectations for the telecommunications industry to address the issues that impact vulnerable consumers. Telecommunication services are essential for the operations of small businesses and it is vital to ensure that when a small business becomes vulnerable they are able to work productively with their telecommunications provider to ensure business continuity. As such, we offer the following comments:

1. The definition of “consumer” in the statement of expectations should include small business and the definition of “vulnerability” should be retained. Small businesses can become vulnerable for various reasons and it is important that in these circumstances they are able to retain vital business services. We recommend the definition of “consumer” should include businesses with fewer than 100 employees or less than \$10 million turnover annually.
2. *Priority 3: Customer Service* should be expanded to include a guarantee of telecommunication services to vulnerable small businesses, specifically the provision of troubleshooting and repair services. This office has worked with small business who have experienced difficulty in obtaining repair and troubleshooting services from telecommunication providers. This can be devastating for small businesses and in itself can cause them to experience vulnerability. To ensure that telecommunication services are easily accessed, ACMA should include a guarantee of service in the statement of expectations.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Mr Paul Buckingham on 02 6243 7821 or at Paul.Buckingham@asbfeo.gov.au.

Yours sincerely



The Hon. Bruce Billson
Australian Small Business and Family Enterprise Ombudsman