

17 November 2021

Transmission and Facilities Access Infrastructure Division  
Australian Competition & Consumer Commission

By email to: [steve.williams@accc.gov.au](mailto:steve.williams@accc.gov.au) and [luis.martinez@accc.gov.au](mailto:luis.martinez@accc.gov.au)

Dear ACCC

## **Audit of Telecommunications Infrastructure Assets – Record Keeping Rules**

Thank you for the opportunity to comment on the ACCC's Audit of the Telecommunications Infrastructure Assets – Record Keeping Rules (the Rules).

We support the proposed changes to coverage information reported by mobile network operators (MNOs). Findings and actions taken by the ACCC based on this information may ultimately reduce the complaints we receive about poor mobile coverage.

### **We receive complaints about mobile coverage**

In financial year 2021, we received 3,197 complaints about poor mobile coverage, which was the fourth most complained about issue for mobile services. This is an increase of 8.2 percent when compared to the previous year, against a decline in overall complaints of 6.1%. In the last two financial years, mobile services were the most complained about service type for consumers living in regional areas.

Our recent submission to the 2021 Regional Telecommunications Review<sup>1</sup> discusses the challenges faced by consumers living outside metropolitan centres who do not have access to reliable services. Mobile coverage has become increasingly critical for consumers who live in regional areas. More of these consumers are using mobile services as their main telecommunications service. However, mobile coverage and blackspots continue to be a major concern for them.

### **Record keepers should be required to provide consistent information on mobile coverage**

We support the ACCC's proposed amendments requiring MNOs to provide more consistent mobile coverage information and report on the assumptions they use to calculate

---

<sup>1</sup> [TIO Submission to the 2021 Regional Telecommunications Review](#) (September 2021).

coverage for mobile networks. In the alternative, the ACCC may also wish to consider requiring MNOs to use a standardised methodology for producing mobile coverage maps.

We hope these new Rules also result in more accurate and consistent public-facing information about mobile coverage.

### *Accurate and consistent mobile coverage maps benefit consumers*

Accurate and consistent mobile coverage maps would benefit consumers and may reduce complaints we receive about mobile coverage. They may also help consumers make more informed decisions about which service or provider they sign up to.

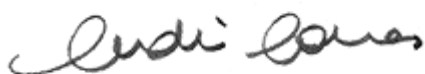
Information about mobile coverage can be confusing for consumers, as it can be difficult for consumers to compare the information in coverage maps produced by different providers. The format and information available can vary between providers and it is sometimes not clear what parameters are used to produce these maps. Some providers make claims about mobile coverage that is expressed in terms of how much of the Australian population is covered. This could create the impression the carrier's mobile coverage is more geographically extensive than really is, which could potentially mislead consumers.

### *Consumers living in regional and remote communities*

Mobile coverage maps are particularly important for consumers living in regional areas, where there is limited mobile coverage in some areas and less choice between services and providers. The impact of no or limited coverage can also have a greater impact on consumers living in these areas, as there is an increased risk of natural disasters. It is critical consumers stayed connected to a service so they can contact emergency services during a natural disaster.

Consumers who live in remote Aboriginal and Torres Strait Island communities are amongst those who complain about providers giving incorrect advice about the mobile coverage available where they live. When consumers purchase mobile plans and devices based on inaccurate advice about mobile coverage, they can find themselves left with expensive plans and devices they cannot use.

Yours faithfully



Judi Jones  
Telecommunications Industry Ombudsman