

2 October 2020

Digital Platforms Branch  
Australian Competition and Consumer Commission  
By email to [digitalmonitoring@accc.gov.au](mailto:digitalmonitoring@accc.gov.au)

Dear ACCC

### **Digital Platform Services Inquiry - March 2021 report on app marketplaces**

Thank you for the opportunity to comment on the operation of app marketplaces in Australia.

I am writing to offer my observations on the complaint mechanisms available to consumers of app marketplaces.

As highlighted in my office's submission to the Treasury on the Digital Platforms Inquiry<sup>1</sup> (earlier submission), there is no single, formalised pathway to help resolve complaints where the digital platforms' internal dispute resolution pathways have failed. For app marketplaces, there are currently limited and disconnected avenues of complaint redress. A consumer may complain to local consumer affairs and fair trading agencies who deal with a wide range of consumer complaint areas. A consumer may also complain to my office about app billing issues, but only where the purchase is made through their mobile service provider by direct carrier billing.

As previously recommended by the ACCC<sup>2</sup>, consumers would benefit from a unified, industry-based redress scheme for complaints about digital platform services, including complaints about apps. An ombudsman scheme for digital platform services, supported by enforcement action from the ACCC and industry standards set by the ACMA, would provide efficient and effective end-to-end support for app marketplace complaints. Consumers would also gain much-needed certainty from having a single pathway for complaints about apps.

As set out in the earlier submission, my office is well positioned to extend to incorporate the handling of complaints about apps and digital platforms more broadly. We have a strong level of trust and respect amongst consumers. We already have the infrastructure and expertise required to handle complaints about app marketplaces, since we currently handle complaints about payment disputes, scams, misleading advertisements, and privacy concerns

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<sup>1</sup> [Submission from the Telecommunications Industry Ombudsman to the Treasury's consultation on the final Digital Platforms Inquiry Report \(September 2019\)](#)

<sup>2</sup> [Digital Platforms Inquiry – Final Report \(June 2019\)](#), recommendations 22 and 23

in the telecommunications sector. Additionally, my office already handles some complaints about app billing where they are purchased through a mobile service provider.

I welcome the opportunity to discuss this further and look forward to the Inquiry's findings.

Yours sincerely



Judi Jones

**Telecommunications Industry Ombudsman**

