



TELSTRA GROUP LIMITED

Telstra submission on ACMA Compliance Priorities 2024-25

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Introduction

We welcome the opportunity to respond to the ACMA's consultation on its compliance priorities for 2024/25. Our brief submission suggests four items for consideration as 2024/25 ACMA compliance priorities.

1 Compliance priorities for 2024/25

Telstra would like the ACMA to consider extending its compliance priority areas (CPAs) to cover combating scam traffic, support for customers experiencing financial hardship, support for customers experiencing family and domestic violence, and EME compliance. Telstra believes that these ongoing priority compliance areas are due to the economic and social impacts associated with these three issues and their ongoing policy focus from government.

Telstra support the ACMA's State of Play reports¹ highlighting the work that telecommunications providers are undertaking to assist vulnerable customers and helping them to stay connected, whilst meeting their financial obligations. To assist our customers, we have a dedicated Enhanced Care and Complaints Centre that services customers in vulnerable circumstances for some of their key needs.

1.1 Combating scam traffic

It is more than three years since the first reducing scam calls code was registered by the ACMA. Since the code was introduced, considerable progress has been made in detecting and blocking scam calls. However, there appears to have been no progress in stopping scam calls closer to their source. There is no visible outcome from three years' worth of traceback requests: spoofing of Australian numbers remains commonplace and there has been no visible action against C/CSPs that originate calls without verifying the a-party has rights of use.

Before action was taken to protect our customer CLIs from being spoofed in traffic arriving onto our network from other domestic carriers, we received 6-9 million calls per week, with the majority of CLI only used once. The introduction of the interactive voice recording (IVR) demonstrated that more than 99% was scam, and that the originating C/CSPs were not preventing the carriage of calls where the a-party did not hold Rights of Use (RoU) to the Number, as required by the code. Following the introduction of IVR for mobiles, we saw an increase in the spoofing of Telstra held geographic numbers and after introducing the IVR to geographic numbers, we observed a surge in the use of other carrier numbers.

It is our view that without enforcement of compliance on C/CSPs requirement to confirm CLI RoU, it is unlikely that any further inroads will be made against the ongoing large volume of scam traffic entering Australia. Use of other measures should also be considered, such as restricting the use of Australian numbers by offshore CSPs and enforcing numbering plan obligations such as allowing the use of mobile CLI from mobile networks only.

1.2 Protecting telco customers experiencing financial hardship

We observe the ACMA has had vulnerable customers as a PCA for the last three years, and we support the ACMA's continuing focus on ensuring vulnerable customers are adequately supported by the telecommunications industry. Customers experiencing vulnerable circumstances should continue to be an area of priority for the ACMA in the upcoming year. The cumulative effects of the COVID pandemic,

¹ ACMA, Financial hardship in the telco sector: Keeping the customer connected. 2024. Available at: <https://www.acma.gov.au/financial-hardship-telco-sector-keeping-customer-connected>



multiple natural disasters and the cost of living is creating an increasing risk of people experiencing vulnerability.

The commencement of the enforceable industry standard for financial hardship from March 29, 2024, will continue the focus on vulnerable customers, and is supported by Telstra. Telstra supported this as a priority focus area in our 2023 submission as this is an area that we will continue to focus on to help improve outcomes for customers requiring financial assistance.

We are pleased the ACMA has decided to name the policy as “payment assistance” in line with a strengths-based approach. Our Chief Customer Advocate’s report² identified that a change in language will be helpful for encouraging more customers to seek assistance as it reduces stigma for many customers who do not identify as being in “hardship” or do not wish to identify that way. This is particularly relevant in a climate where the face of vulnerability is changing. Many households that are considered middle-income, i.e., those with jobs and mortgages, are now experiencing financial stress and do not have experience accessing hardship programs and support.

It is important for consumer confidence that the ACMA continues to ensure telecommunications providers deliver on areas of assistance that they are required to meet under the new standard. It will be important for the ACMA to monitor how providers are meeting their obligations.

1.3 Supporting customers experiencing domestic and family violence

Telstra would like to see the ACMA continue to monitor how customers experiencing domestic and family violence are supported by telecommunications providers. In our 2023 submission we stated our desire to extend the priority scope areas to other vulnerable customers, which may include customers experiencing domestic and family violence.

We support the Federal Government’s adoption of a National Plan to end violence against women and children in one generation. Telstra acknowledges that the Government calls on corporations to be a key part of a multi-sector response to ensure the success of the National Plan. Service providers, advocates and victim-survivors are now driving the adoption of an innovative approach for telecommunication companies that focuses on prevention and stopping violence before it begins.

The ACMA priorities have included an assessment of what telecommunications providers are doing to assist customers experiencing domestic and family violence. Telecommunications providers are in a unique position to assist customers experiencing domestic violence, as often the communication channels are a conduit for violence to continue. Australia’s National Research Organisation for Women’s Safety (ANROWS) found that one in two Australians reported having being victims of technology-facilitated abuse with the victims more likely women.³ Telstra’s Chief Customer Advocate report called for the telecommunications industry to work on ending technology facilitated abuse⁴.

Technology is also a means to obtain support for victims of domestic and family violence and compliance with the TCP code to continue communications in a safe way is important for victim survivors. Telstra’s SAFE team is a specialist group trained to support customers affected by domestic and family violence⁵. The team provides a direct point of contact through voice and messaging for victim survivors. They support

² Telstra, 2023 Chief Customer Advocate, Report on Customer Vulnerability, available at <https://www.telstra.com.au/content/dam/tcom/about-us/community-environment/pdf/telstra-chief-customer-advocate-report-on-customer-vulnerability.pdf>

³ Powell, Anastasia, Asher Flynn, and Sophie Hinds, *ANROWS, July, 2022*, Technology-facilitated abuse: National survey of Australian adults’ experiences.

⁴ Telstra, 2023 Chief Customer Advocate, Report on Customer Vulnerability, available at <https://www.telstra.com.au/content/dam/tcom/about-us/community-environment/pdf/telstra-chief-customer-advocate-report-on-customer-vulnerability.pdf>

⁵ Telstra, 2021, Safe and secure communications for anyone experiencing domestic and family violence, available at <https://www.telstra.com.au/exchange/safe-communications-for-anyone-experiencing-domestic-and-family-violence>



them to make informed decisions about their accounts and services and to safely make changes to any existing account settings and services; changes of ownership; and/or to activate new services. The team can refer customers to external support services such as Ask Izzy, 1800 RESPECT, or to a financial counsellor. Telstra acknowledges that it is important for all telecommunications customers to have access to similar support services.

It is expected that aspects of the current Guideline to support customers affected by Domestic and Family Violence⁶ will be incorporated into the revised TCP Code which will be enforceable.⁷ Telstra recommends that the ACMA monitor compliance with the new code once its registered to ensure that telecommunications providers are delivering their obligations to support customers affected by Domestic and Family Violence.

1.4 EME Compliance

Telstra would like to see the ACMA continue the 'base station EME Audit program' and continue to update the EME Checker online tool that allows the public access to mobile tower emissions.⁸ This audit provides a valuable independent public safety reassurance program. We understand that this year the ACMA is conducting 5G mmWave EME audits and populating EME Checker. We support this ongoing work.

Telstra proposed that an area of focus for the ACMA's 2024-25 Compliance Priorities could be the transition from 3G to 5G in low-band spectrum frequencies. As 3G networks are being shut down in 2024, Mobile Network Operators are transitioning the spectrum used for 3G (i.e., the 850 MHz and 900 MHz bands⁹) over to 5G networks. Auditing the transition from 3G to 5G to compare changes in EME levels between 3G and 5G networks will show consumers that upgrading the technology does not result in increases in EME.¹⁰ This will be of assistance to assuage any residual public concerns about the introduction of 5G and the transition from 3G.

Telstra also recommends the ACMA continue to provide an annual update of the audit results along with the infographic it previously used to present the results. The industry will be able to demonstrate their compliance with the radiation standards, whilst the benefit to consumers is in providing them with the knowledge that mobile base stations are checked and audited.

⁶ Communications Alliance, 2023, Telcos Unite to Support Australians Affected by Domestic and Family Violence, available at <https://commsalliance.com.au/Documents/releases/2016-media-releases8/2023-media-release-4>

⁷ Communications Alliance, TCP Code Review Package, December 2023, available at <https://www.commsalliance.com.au/hot-topics/TCP-Code-Review-2024>

⁸ The ACMA, 2024, EME Checker, available at <https://www.acma.gov.au/publications/2022-08/guide/eme-checker>

⁹ Note: 4G is operated on the 700 MHz band

¹⁰ 5G is already well tested and well understood to be significantly below the ARPANSA RPS S-1 Standard.