

18 October 2024

Via email: [national.interests@acma.gov.au](mailto:national.interests@acma.gov.au).

**Attn:** Cathy Rainsford

The Manager  
National Interests Section  
Australian Communications and Media Authority  
PO 13112 Law Courts  
Melbourne Victoria 8010

**Re: Proposed Telecommunications (Customer Communications for Outages) Industry Standard 2024**

Dear Cathy,

Symbio Holdings Ltd (Symbio) appreciates the opportunity to comment on the proposal on Customer Communications for Outages.

Symbio provides innovative communications platform solutions to enterprise and wholesale customers and global communication service providers. These solutions include:

- Telecommunications as a Service (TaaS) – Providing cloud communications, mobile services and NBN access to retail telcos and managed service providers.
  - Enablement: Amongst the many services that Symbio offers to its customers is enablement management service that provides MVNOs/CSPs with Software as a Service product to allow activation, deactivation, billing and management of services; thereby facilitating the needs of providers who buy directly from MNOs/Infrastructure Carriers but have no software capability in servicing services to their clients.
- Communications Platform as a Service (CPaaS) – Providing voice and messaging capabilities and the ability to host and port phone numbers to global communication service providers.
- Unified Communications as a Service (UCaaS) – Providing cloud-based enterprise calling and collaboration services to enterprise and government customers across the Asia Pacific, with direct integration into Microsoft Teams and Cisco call manager.

Symbio supports the submission by Communications Alliance and are addressing a question raised in the consultation paper specific to Symbio's business model here:

The consultation paper raises questions with regard to exemptions:

**Different classes of customers**

**Question 6:** Should the standard deal with matters differently for different classes of end-users of carriage services supplied by carriers and carriage service providers?

Enablement management service is a software stack that provides MVNOs/CSPs with a Software as a Service product to allow activation, deactivation, billing and management of services; thereby facilitating the needs of MVNOs. For example, supermarket chains who sell own brand mobile services or other CSPs who offer low end price-point market providers. These MVNOs/CSPs buy directly from MNOs/Infrastructure carrier but outsource software capability in their provision of services to their clients.

Symbio requests an exemption be applied to Enablement services, as this sits outside of the carriage service provision and the ownership of end-user relationship; making it very difficult to provide end user notifications.

The standard also extends to Enterprise, Government and large businesses, however CSPs may not have contact details for all end users in this scenario to provide the required notifications, therefore we request an exemption on end-user notifications, or that provisions be included to notify the account holder or an authorised representative for these customer types.

Symbio recommends that the Determination should ensure that end user information that is shared during outages be solely for the purpose of outage communications and use established forms of communication already in place. Symbio also cautions that Multiple CSPs having responsibilities in this area will lead to duplication of messaging, lack of clarity regarding responsibility and confusion for the end-user.

Symbio is happy to further provide examples to the ACMA team at a convenient time once they have reviewed responses.

Yours sincerely,

Confidential contact details:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]