

17 April 2025

Communications Alliance Ltd
Level 25, 100 Mount Street
North Sydney NSW 2060

By email: c.purdon@commsalliance.com.au

Dear Communications Alliance,

TIO submission on the scheduled review of the Connect Outstanding Industry Code

Thank you for the opportunity to provide feedback to Communications Alliance's review of the Connect Outstanding Industry Code (**the Code**).

We support the goals of the Code to provide consumers consistent access to services when they move to a new address, and to give telcos a clear process for accomplishing that.

Our submission offers feedback on areas where the Code could be amended to decrease the amount of time it takes for a consumer moving into a premises to get connected and to give providers greater clarity on how a request to release a service should be validated.

1. The overall timeframe of the connect outstanding process should be reduced

We acknowledge that the Code seeks to balance clear expectations for consumers and giving telcos reasonable time to complete connection orders. However, considering the increasing importance to consumers of having access to telco services, we believe some timeframes set out in the Code should be amended, and some clauses that do not currently have a timeframe should have one included.

Clear and reasonable timeframes for connection at a new premise will support consumers to get connected sooner, build trust and confidence in the telco sector, and may reduce complaints.

1.1 Timeframe for starting the connect outstanding process

Clause 5.2.1 of the Code says when a new occupant applies for a connection and the existing service has not been cancelled, the gaining service provider must initiate the connect outstanding process.

This clause does not set a timeframe on the gaining service provider to initiate this process. This omission could lead to delays between the point when a gaining service provider discovers the existing service is still active, and the point when it must contact the consumer to work through the next steps.

We sometimes receive complaints from consumers who move into new premises and are not contacted by their provider to start the connect outstanding process until several days after placing their order, or do not find out that the connect outstanding process is required until they proactively contact the provider to check the progress of their order.

To ensure this process remains focused on getting the consumer connected without additional delays, and to help clarify the requirements on providers at this stage of the process, we recommend Communications Alliance introduce a maximum timeframe to clause 5.2.1 of no more than two business days, which could be subject to certain exclusions (for example if the delay is not caused by the provider).

1.2 Timeframe for placing connection orders

Clause 5.7.1 of the Code requires the gaining service provider to ensure that, once the existing service has been cancelled, a connection order proceeds within timeframes specified in the *Telecommunications (Customer Service Guarantee) Standard 2011 (the CSG Standard)* where applicable.

The connection of broadband internet services is not subject to the timeframes in the CSG Standard, and therefore the Code does not set any maximum timeframe for placing a connection order for these services. We recommend Communications Alliance amend this clause to ensure connection orders for internet services are placed efficiently and with clear timeframes to avoid unreasonable delays to consumers.

1.3 Timeframe for completing connection orders

The Code states that a connection order must be completed within eight clear business days once the existing service is released if there are no objections (5.1.1), or within eight clear business days once proof of occupancy documents have been validated (5.2.2(e)).

While we support the Code specifying a timeframe for these clauses in principle, the current timeframes could lead to unnecessary wait times for consumers, particularly if:

- proof of occupancy needs to be validated
- there is an objection to a request for release, or
- a losing provider has trouble validating one.

The Code should be amended to reduce the timeframe for completing a connection order following the acceptance or bypass of a request for release, reducing the overall time consumers will wait for a connection. We recommend Communications Alliance consider if five business days is appropriate.

2. Telcos and consumers would benefit from clarification on how to validate a request for release

We support the Code's requirement for losing service providers to validate a request to release a service (clause 5.4.5). However, the Code should include more information about what this validation process involves.

This will help losing service providers respond to requests for release more quickly and prevent premature or unintended cancellations.

For example, the Code could provide more clarity on the validation process by stating:

- what type of information service providers should consider as part of this validation process
- in what situations should losing service providers contact the previous occupant as part of the validation process, and
- in what situations should losing providers accept a request for release without contacting the previous occupant.

We look forward to the outcome of this consultation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Cynthia Gebert', followed by a long, horizontal, sweeping flourish that ends in a small upward tick.

Cynthia Gebert
Telecommunications Industry Ombudsman