

Mr Luke Coleman
Chief Executive Officer
Communications Alliance Ltd
GPO Box 444
Milsons Point NSW 1565

Dear Mr. Coleman,

Telecommunications Consumer Protections (TCP) Code Review

I am pleased to provide a submission on behalf of NSW Telco Authority (NSWTA) to the Communications Alliance's Stage 3 consultation on the revised draft TCP Code.

NSWTA is a statutory authority established by the *Government Telecommunications Act 2018* (the GT Act). NSWTA's functions include management of the Public Safety Network (PSN), an interoperable land mobile radio network used by Emergency Services Organisations and others with sanctioned roles in public safety and emergency management operations.

NSWTA delivers digital connectivity initiatives to address the state's connectivity challenges, working collaboratively with industry to keep people and places safe and connected.

As the NSW Government's digital connectivity leader, NSWTA coordinates all-of-government priorities and programs to uplift digital connectivity for communities. This recognises the increasing importance of equitable participation in the digital economy, including the ability to access digital services for business, employment, educational, social and public safety purposes, and improved digital connectivity outcomes for NSW.

NSWTA is developing NSW's first Digital Inclusion Strategy, which relevantly, aims to ensure that world-class digital government services are accessible to everyone, while also providing non-digital options for those who need them, particularly those who lack access to or the ability to use digital options.

NSWTA welcomes the revised TCP's emphasis on digital inclusion and accessibility, which align closely with the NSW Digital Inclusion Strategy. Stricter requirements for responsible selling, enhanced accessibility via interpretation and translation services will foster and support stronger protections for vulnerable consumers.

However, in relation to accessible customer service channels particularly for vulnerable consumers most at risk of digital exclusion, NSWTA does not believe the revised TCP goes far enough.

Part 7 Customer Service and Support sets out the requirements for timely, easy and convenient consumer access to their Carriage Service Provider's (CSP) customer service and support channels. This includes either telephone support or live chat options to enable consumers to communicate in real, or near real, time (7.1.2 -7.1.3) or where a customer support channel has not previously included a telephone number, an alternative such as live chat with clear escalation pathways to enable a customer to speak to a real person if required (7.1.4).

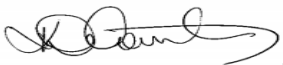
Traditional telephone support remains crucial, even in the digital era. NSWTA's experience in developing the Digital Inclusion Strategy identified that the shift away from in-person and

telephone services disproportionately impacts people living in regional and remote areas with limited connectivity, as well as older individuals and others who may lack digital literacy or confidence. Additionally, live chat options require a functioning digital device, internet connectivity, and the skills to initiate and navigate the system, which can be a barrier for some consumers seeking support from their CSP or depending on the nature of their support inquiry.

NSWTA recommends further consideration of Part 7 in respect of appropriate and inclusive contact channels to better support equitable access to customer support regardless of their digital literacy or connectivity levels.

Should you wish to discuss this submission, please contact Georgina Gold, A/Director Whole-of-Government Connectivity Leadership, NSWTA at georgina.gold@customerservice.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "Kylie De Courteney".

Kylie De Courteney
Managing Director
NSW Telco Authority

February 2025