Australian
Telecommunications
Alliance

AUSTRALIAN TELECOMMUNICATIONS ALLIANCE SUBMISSION

To: Australian Communications and Media Authority

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

18 Feb 2026

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1. AUSTRALIAN TELECOMMUNICATIONS ALLIANCE

The Australian Telecommunications Alliance (ATA) is the peak body of the Australian telecommunications industry. We are the trusted voice at the intersection of industry, government, regulators, and consumers. Through collaboration and leadership, we shape initiatives that grow the Australian telecommunications industry, enhance connectivity for all Australians, and foster the highest standards of business behaviour. For more details, visit www.austelco.org.au.

For questions on this submission, please contact Craig Purdon, c.purdon@austelco.org.au.

2. RESPONSES TO THE CONSULTATION

The Australian Telecommunications Alliance (ATA) welcomes the opportunity to provide this submission in response to the Australian Communications and Media Authority's proposed amendments to the *Telecommunications (Customer Communications for Outages) Industry Standard 2024* Consultation paper.

ATA acknowledges the critical importance of providing customers with clear, accessible and relevant information about network outages, as this can help them mitigate the impacts of service disruption, whether they are using the service for domestic or business purposes. The aim is to support effective customer outcomes while ensuring implementation remains feasible and proportionate for carriers and carriage service providers (CSPs).

The draft instrument to introduce public outage registers seeks to advance transparency, but as currently framed it risks duplicating live notification obligations, creating operational complexity, and reducing clarity for customers. Generally, this submission recommends the instrument should:

- Clarify that the register is an authoritative, validated record — not a live feed — and align its update cadence with verified data cycles.
- Keep obligations targeted at carriers and require CSPs to provide links/visibility only (not duplicate registers).
- Simplify Schedule 1 into plain-English, service-agnostic fields and allow omission of inapplicable items.
- Tightly scope any broader changes (e.g., natural disasters; planned outages) to avoid over-notification and operational distortion.

2.1 IMPLEMENTING THE OUTAGES REGISTER DIRECTION – OBJECTIVES AND SCOPE

Issue for comment 1: Do the proposed amendments to the CCO standard (as set out in the draft instrument) give effect to the objectives and minimum content requirements of the outages register direction? If not, please explain why, and suggest wording that would better meet the objectives of the outages register direction.

2.1.1   For the most part, ATA's is of the view that the draft gives effect to the direction, but risks conflating the purpose of a register with live notifications and the inclusion of some information which is deemed unnecessary . A register should be an authoritative, consolidated record that is accurate post-validation, not a real-time feed. This distinction is important as outage details typically evolve rapidly, and early data can be incomplete or inaccurate.

2.1.2   The separation of live outage information (an outage which is currently being reported on) versus information on a historic or past event outage would help to ensure customers are not confused by the information they are querying.

2.1.3   There are concerns that some of the minimum information required, such as 'the number of premises impacted' or the types and respective numbers of carriage services impacted where multiple service types are affected, are adding complexity and a granularity of information which is of no real value to customers.

Issue for comment 2: Are there any additional matters aligned to the objectives that should be included in the draft instrument, including whether the flexibility to treat different classes of carriers or CSPs differently or exempt certain classes should be applied? Please explain your position and, provide evidence and suggested wording where relevant.

2.1.4   Flexibility for different classes is essential. Many CSPs do not operate networks and cannot feasibly maintain independent registers. Obligations should remain targeted at carriers. CSPs should ensure customer visibility by linking to carrier registers where relevant. Exemptions and differential treatment can assist in preventing duplicated cost and confusion.

2.1.5   We propose to amend the definition of "website" (as per below) to improve customer clarity and assist with the ease of navigation for websites of international providers.

"*website means a website that is generally available to the public and is primarily for customers in Australia*".

2.1.6   Similarly, we suggest the language in section 26 be amended for consistency: "*If it has a website, the carriage service provider must ensure that at all times on and after 30 June 2026 its website displays, in a prominent position, a link to the outage register published by the carrier for the relevant carriage services*."

Issue for comment 3: Should the obligation for CSPs to display a link to the outage register apply only to CSPs who are not carriers (as currently drafted to reflect the outages register direction), or should it also apply to carriers that act as CSPs to ensure transparency for consumers? We are interested in whether this might be a gap and what approach would best meet the objectives of the outages register direction.

2.1.7   Applying a link obligation to carriers-as-CSPs would duplicate duties already satisfied at the carrier level and add no practical customer benefit. It would also increase compliance complexity and may cause website clutter. We recommend maintaining the obligation for non-carrier CSPs only.

2.2 TIMING FOR REGISTER PUBLICATION AND ALIGNMENT WITH NOTIFICATION REQUIREMENTS

Issue for comment 4: Do you consider the timing requirements for updates to the outage register (including periodic review) to be clear and workable? If not, please explain why and suggest improvements.

2.2.1 The 6-hour/24-hour cadence to mirror live communications may not be aligned with processes already in place for some members in being able to update a register of historic outage data.

2.2.2 As a minimum, the requirement should be for information to be provided in the historic outage register once an outage is resolved, although this does not preclude some providers from updating both at the same interval. This requirement should be optional and allow providers to update the historic outage register at a timing that suits their current processes, but meets the minimum requirement.

2.2.3 ATA recommends that register entries be created and/or updated after material facts are verified (e.g., post-outage restoration), with a clear timestamp of publication and any subsequent corrections. This ensures accuracy without forcing providers to republish evolving estimates as if they were final.

2.2.4 Where the ACMA wishes to retain cadence language, it should be framed as review intervals for accuracy rather than mandatory public updates.

2.3 MINIMUM CONTENT REQUIREMENTS AND STANDARDISED PRESENTATION

Issue for comment 5: Are there any additional content elements aligned to the outages register direction's objectives that should be included in the outages register? Please list these and provide reasons as to why they ought to be included.

2.3.1 Schedule 1 should be simplified into plain-English, service-agnostic fields. Some fields (e.g., 'premises impacted') are not applicable to mobile events; other language (e.g., 'relevant carriage services') is not customer-friendly. Where impact to service types is not visible to the carrier, it should not be expected to be captured in the register or outage notice reported by that carrier.

2.3.2 The schedule should also allow omission of inapplicable fields and emphasise clarity over technical precision in public-facing text.

2.3.3 An alternate approach could be:

(a) state expressly that the register compiles validated records of relevant outages;

(b) separate the register-update timing from live notification cadences; and

(c) require a stable, customer-readable presentation with a minimal, plain-English field set; and

(d) fields within the minimum core field set should be in a flexible field format to allow current systems to feed into it, without requiring additional IT development.

2.3.4 To assist with 2.3.3(c) above, we propose that a minimum core field set could contain:

(a) record type (Initial/Update/Restoration) (flexible field format);

(b) outage start (date/time, local time);

(c)   restoration (date/time, or 'investigating');

(d)   affected service type(s) (e.g., mobile voice, mobile data, fixed broadband);

(e)   approximate geographic area;

(f)   description of impact (plain English);

(g)   estimated time to restore (if known); and

(h)   responsible network operator (carrier), which is relevant or specific to the outage.

Issue for comment 6: Should the content requirements for outage registers and notifications under section 13 of the CCO be aligned to reduce duplication and improve consistency and usability? If so, would a single form or data structure (such as that proposed at Schedule 1 but with additional fields) achieve this? If not, please suggest an alignment format that would be most practical that is also aligned with the objectives of the outages register direction.

2.3.5   Alignment is desirable to reduce duplication, but a single rigid template would impose significant costs. This should be an option, but not a mandatory obligation for those carriers that wish to align these processes within their organisations.

2.3.6   ATA recommends a harmonised data model with optional fields. Providers would populate only the subset relevant to live notices and the register entry. This approach seeks to deliver consistency without forcing extensive systems rebuilds.

Issue for comment 7: Do you have any concerns about the proposed format in which the information is required to be presented at Schedule 1? If so, what changes would you suggest to improve clarity, usability, or consistency (noting the accessibility requirements imposed by the outages register direction)?.

2.3.7   Key concerns include:

(a)   customer-unfriendly terminology;

(b)   assumptions about carrier visibility into downstream retail contexts; and

(c)   inapplicable fields across service types.

2.3.8   We proposes replacing Schedule 1 with a structure such as proposed in 2.3.3 above and allowing providers to present information in their established outage page style, provided the core fields are included and machine-readable extract is available. As mentioned, the structure should allow for flexible field formats.

2.4   EXTRACTABILITY AND ACCESSIBILITY

Issue for comment 8: Noting that information in the outage register needs to be extractable, should the CCO standard specify a minimum structured format (for example, a downloadable file or machine readable format such as CSV), or allow flexibility for carriers to choose their own approach? What benefits or challenges would each option create?

2.4.1   A minimum downloadable structured format (CSV or equivalent) is supported. Mandating APIs within current timelines would be impractical and could divert resources from core delivery.

2.4.2 CSV is likely to provide sufficient analytical utility for the Triple Zero Custodian, emergency services and the ACMA, and is generally compatible with accessibility tooling when presented alongside an accessible web view.

Issue for comment 9: Are there existing challenges in presenting content that complies with WCAG 2.2 standards? If so, please outline what, if any, support or guidance would assist to achieve this.

2.4.3 No. Most providers are likely meeting or seeking to meet these standards currently.

2.5   COMMENCEMENT

Issue for comment 10: What is the earliest practical date industry could have the amendments fully implemented and the outages register operational, ahead of the mandated timelines?

2.5.1 To build a robust, customer-friendly register (plus any necessary extract pipeline) requires systems work, content design, accessibility checks, and coordination between carriers and CSPs for link hand-offs. As much time as possible will be required to ensure a workable solution, and it is not expected that this work will be completed at a time materially ahead of the mandated timeline

2.5.2 The ACMA may wish to consider staggering the carrier and CSP implementation dates as CSPs will be reliant on receiving a carrier's link before they can publish these.

2.6   BROADER OPERATION OF THE CCO STANDARD

Issue for comment 11: In relation to significant local outages and major outages, please comment on the following matters, and where relevant, include examples:

a) *How do providers currently assess what constitutes a major outage and a significant local outage?*

b) *How are the words "likely to affect" in those definitions applied in practice?*

c) *Are there any parts of the definitions that would benefit from further clarification?*

d) *Are the current thresholds appropriate and, if not, what alternative thresholds would better achieve the objectives of the 2024 direction and why?*

2.6.1 We would welcome the opportunity for members to meet and discuss further detail with respect to the questions posed under Section 2.6 of the consultation paper.

2.6.2 Current definitions drive inconsistent outcomes and frequently require post-incident reassessment. Geographic indicators are especially problematic for some providers, given differences in network topology, wholesale/retail layers and platform models.

2.6.3 The ATA recommends focusing the trigger on material service impact (e.g., an inability to make/maintain calls or access the internet) rather than rigid counts or broad locality labels. This better aligns with consumer harm and avoids distorting fault-management practices.

Issue for comment 12: Are the current arrangements for communicating with customers about outages caused by natural disasters appropriate and effective? In particular:

a) *Do existing rules support timely, accurate and accessible information to the public about outages in disaster contexts?*

b) *Have there been any challenges in applying the definition of 'natural disaster' (for example, meeting the time thresholds for significant local outage or major outage that trigger notification obligations) in determining the cause of an outage?*

c) *Should there be any changes to the current provisions regarding outages caused by natural disasters? If so, please provide reasons and evidence where relevant to support your response.*

2.6.4   The current framework is largely appropriate. Additional prescriptive obligations during disaster response would draw effort away from restoration and safety coordination.

2.6.5   Provisions should maintain minimal, targeted requirements and leverage existing channels with emergency services and government where appropriate.

Issue for comment 13: Should the CCO standard be extended to include communications with customers about planned outages, noting that these can cause impacts to triple zero connection? Please provide reasons. If so:

a) *Which elements (for example, timing, minimum content, accessibility requirements) should apply to communications about planned outages?*

b) *(Should the obligations for planned outages differ from those obligations for unplanned outages? If so, how?*

c) *How do/should providers balance proactive communication for planned maintenance with clarity about potential impacts on access to critical services (including triple zero)?.*

2.6.6   The ATA strongly cautions against incorporating planned outages into the CCO regime. Planned work is already communicated through established channels and typically scheduled to minimise impact to end-users. Bringing it under the Standard risks over-notification/notification fatigue and adds cost without clear customer benefit.

2.6.7   If considered at all, any provisions should remain voluntary guidance.

Issue for comment 14: Are there any other issues or gaps relating to the operation of the CCO standard you consider should be examined in the 2026 review (for example, opportunities to reduce duplication, improve consistency or strengthen accessibility)? Please explain your views and provide evidence where relevant.

2.6.8   The review should seek feedback from recipients who receive multiple notifications from different entities about the same major or significant local outage to ascertain which notices those recipients gain most benefit from.

Ends