



20 December 2019

Committee Secretary
Senate Standing Committees on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Committee Secretary,

Inquiry into the Telecommunications Legislation Amendment (Competition and Consumer) Bill 2019 and the Telecommunications (Regional Broadband Scheme) Charge Bill 2019

I am pleased to see the progress of the proposed Statutory Infrastructure Provider (SIP) framework. These reforms were consulted on twice in 2017 and I made submissions to both consultations. The SIP framework is an important step toward ensuring regulatory settings are fit-for-purpose as the telecommunications landscape evolves.

As raised in one of my previous submissions on the SIP framework, I believe all consumers should be guaranteed a connection that supports voice capability. While satellite technology presents challenges for voice services, a SIP obligation that does not guarantee voice services for consumers may leave those in mobile black spots without a way to call emergency services.

We are able to handle complaints about connection delays and where a consumer has no service. Where the network operator is a member of our scheme, our Terms of Reference allow us to involve them where a refusal, delay or failure to meet their SIP obligations impacts the complaint.

The *Consumer Safeguards Review – Part B (reliability of services) Final Report* observed that the SIP framework could be used to create wholesale timeframes and benchmarks. It will be important to ensure rules, standards and benchmarks set under the SIP framework are consistent with the ACCC's final determination on NBN Wholesale Service Standards.

I look forward to seeing the Committee's recommendations at the conclusion of this Inquiry.

Yours sincerely,

Judi Jones,

Telecommunications Industry Ombudsman