



30 September 2020

Committee Secretariat
Joint Standing Committee on the NBN
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Dear Committee Secretariat

Inquiry into the business case for the NBN and the experiences of small businesses – supplementary submission

Thank you for the opportunity to provide a supplementary submission to the Committee.

Since my office made [our submission in January 2020](#) to the Committee, Australians have experienced a period of disruptive change, particularly as a result of the COVID-19 pandemic.

During COVID-19, residential and small business consumers have used and relied on phone and internet services for work, study, social connection and more. Telecommunications providers have had to respond to a surge in customer demand and contacts – while managing impacts on their own operations from government restrictions and lockdowns (both in Australia and overseas).

Update on complaint volumes for services delivered over the NBN

In Financial Year 2020, my office received 127,151 complaints from residential and small business consumers.¹ For services delivered over the National Broadband Network (NBN) in the same period, my office received 35,601 complaints about service quality or about connecting to or changing a provider.²

The chart in **Appendix A** provides a consolidated view of the volume of fault and connection complaints for internet, landline, and multiple services delivered over the NBN between April 2019 and June 2020. The chart includes a breakdown of complaints from residential consumers and small businesses.

In the period January to March 2020, my office received fewer fault and connection complaints about services delivered over the NBN compared to the same period in 2019.³ Between April and June 2020, complaint numbers were comparable to the same period in 2019.

Over the past financial year, an increasing number of services have been delivered over the NBN. 1,735,306 services were activated during Financial Year 2020, resulting in a total of 7,267,396 premises connected to the NBN by the end of the year.

For more information on complaints received by my office in Financial Year 2020, please see our [Annual Report Financial Year 2020](#), which was published today.

¹ This is a decrease from Financial Year 2019, when we received 132,387 complaints from residential and small business consumers

² This is a slight increase from Financial Year 2019, when we received 33,795 fault and connection complaints for services delivered over the NBN

³ See our January 2020 submission which contains volumes of fault and connection complaints about services delivered over the NBN, for five quarters starting from Quarter 1 Financial Year 2019.

As quarterly data continues to be updated, there may be slight changes to previously reported data within a financial year. This allows for complaints to be updated as more information is provided.

Impact of the COVID-19 pandemic on complaints

In July 2020, my office released a systemic investigation report '[Impact of COVID-19 on complaints](#)' (see **Appendix B**). The report explores key themes in complaints that emerged between March and June 2020 and highlights our work with telecommunications providers to address pandemic-related issues. This report is not confined to services delivered over the NBN.

Complaints received by my office showed consumers were relying more heavily on their services to work, study, and connect with friends and loved ones. Small businesses that moved to home-based operations were generally relying solely on telecommunications services to conduct their business.

From March 2020 onwards, demand for phone and internet services soared.⁴ The telecommunications industry worked individually and together to improve access to services and provide temporary financial relief for consumers and small businesses. Steps taken by the industry included NBN Co's offer to provide up to 40% more CVC capacity to internet providers (without extra cost) until 30 November 2020.⁵ The response from the industry helped support the new demand landscape and may have prevented a significant surge in complaints to my office.

While total complaint volumes in March – June 2020 did not change significantly from the same period in 2019, we identified three themes directly related to the pandemic. The themes were:

1. Consumers not being able to contact their provider
2. Fault and connection problems being more disruptive for consumers
3. Financial impacts on consumers starting to emerge.

Our systemic investigation revealed where more could be done by all parties in the supply chain to protect consumers, particularly those who are vulnerable. My office will continue to monitor what consumers are telling us about the impacts of COVID-19 and engage with telecommunications providers and NBN Co to improve the customer experience.

NBN Co helps my office resolve complaints about retail service providers

As an external dispute resolution scheme for unresolved complaints about phone and internet services obtained under contracts with retail service providers, my office primarily resolves complaints between consumers and their retail service providers. This means we refer fault and connection complaints to the consumer's retail service provider.

At times, we seek assistance from NBN Co in its capacity as a network provider to investigate and resolve a complaint about a service delivered over the NBN, under section 27 of the *Telecommunications (Consumer Complaints Handling) Industry Standard 2018*.

Where necessary, my office has worked constructively with NBN Co to resolve individual complaints, as well as raising and addressing more widespread issues. For instance, we have shared findings from our June 2020 systemic investigation report '[Addressing the causes of small business complaints](#)' (see **Appendix C**). We have also shared with NBN Co issues consumers have reported during the pandemic, such as technicians accessing a home or workplace against the backdrop of safety procedures or government rules.

I hope the information provided in this submission assists the Committee and the Inquiry.

Yours sincerely,

Judi Jones
Telecommunications Industry Ombudsman

⁴ <https://www.nbnco.com.au/corporate-information/media-centre/media-statements/nbn-continues-to-support>

⁵ <https://www.nbnco.com.au/corporate-information/media-centre/media-statements/nbn-extends-capacity-offer>

Appendix A

