

Authority Secretariat
Australian Communications and Media Authority
via web submission

20 March 2026

ACMA Compliance and Enforcement Priorities 2026–27

This submission provides Australian Communications Consumer Action Network (**ACCAN**) feedback to the Australian Communications and Media Authority's (**ACMA**) consultation on its compliance and enforcement priorities for 2026-27. ACCAN is the peak national consumer organisation advocating trusted, accessible, inclusive, affordable and available communications and digital services. This submission is endorsed by the Consumer Action Law Centre and Westjustice.

1. The ACMA should prioritise public safety and Triple Zero regulation

Recent failures of telecommunication providers to maintain mobile networks have restricted consumers' access to Triple Zero and led, in some instances, to catastrophic consequences.¹ ACCAN strongly supports the ACMA continuing its focus on compliance with Triple Zero and public safety requirements in 2026-27.

The Senate Environment and Communications References Committee inquiry into the Triple Zero service outage (**the inquiry**) has so far revealed significant issues with providers' compliance with rules under the *Telecommunications (Emergency Call Service) Determination 2019* (Cth). The inquiry also revealed substantial issues regarding the compatibility of mobile software and hardware with Triple Zero calling.

Failure of the Triple Zero call service, whether resulting from network or device impacts, should be of utmost priority to the Government and the ACMA and warrant swift regulatory interventions. ACCAN is highly concerned that evidence provided to the inquiry notes ACMA took more than two months to issue a notice to NSW Ambulance to gather further information, following notification that a person could not call Triple Zero and had passed away.

ACCAN considers that the ACMA must prioritise public safety through its regulatory interventions, compliance and enforcement activities to improve the reliability of telecommunication networks and safeguard consumer access to critical emergency services. In doing so, the ACMA should reject a narrow focus on compliance and adopt a broader regulatory approach that prioritises proactively addressing consumer harm.

¹ Lewis Wiseman and David Taylor, 'Three People Died after Optus Network Failure Impacted Triple-0 Calls', *ABC News* (online, 19 September 2025) <<https://www.abc.net.au/news/2025-09-19/optus-network-failure-three-people-dead-triple-zero/105796226>>; Eliza Goetze and Stephanie Chalmers, 'Inquiry Hears Second Death May Be Linked to TPG Triple Zero Failure', *ABC News* (online, 9 December 2025) <<https://www.abc.net.au/news/2025-12-09/triple-zero-outage-senate-hearing-tpg-telecom-second-death-link/106118690>>.

2. The ACMA should prioritise strong and appropriate consumer safeguards

ACCAN considers the revised Telecommunications Consumer Protections Code (**TCP Code**), submitted to the ACMA in October 2025, fails to provide appropriate community safeguards and is incapable of registration. It is now four months since the revised TCP Code was submitted to the ACMA for consideration, and well over three years since the Code review process commenced. ACCAN considers the ACMA must act now to protect vulnerable consumers by rejecting the revised TCP Code and implementing direct regulation for essential consumer safeguards.

The ACMA's inaction to address persistent consumer harm through the TCP Code is contrary to its enduring priorities to protect vulnerable telco consumers. Lax and inappropriate consumer protections in the TCP Code have led to significant consumer harm from poor sales practices, disconnection, customer service, and account issues.

ACCAN is aware that frontline services, including Westjustice, continue to see many cases of people being inappropriately sold products and services they do not need and/or cannot afford, including victim-survivors of Domestic, Family and Sexual Violence (**DFS**), and people who are already experiencing financial hardship and other forms of disadvantage. We therefore urge the ACMA to address significant consumer harm resulting from irresponsible sales practices through direct regulation of sales practices and credit assessments.

Case study: The National Debt Helpline receive many calls from customers who cannot contact Telstra, with some people waiting several hours before getting disconnected. Long customer service wait times present barriers to accessing essential communication services and disproportionately impact people who are more digitally excluded.

3. The ACMA should prioritise addressing scam harms

ACCAN supports the continuation of the priority to disrupt mobile number fraud in 2026-2027, but the ACMA should expand its scope to more broadly prioritise all scams and fraud related to telecommunications services. In 2024, scams via phone calls and text messages resulted in \$121.2m of reported losses, with phone scams having the highest overall losses². This data demonstrates that C661:2022 Reducing Scam Calls and Scam SMS code (**the existing scams code**) is not sufficient to protect consumers from harm due to scams reaching them via telecommunications services.

To address scam harms, the ACMA should proactively use the powers at its disposal to enforce the existing scams code, as well as the SMS Sender ID register, and the *Telecommunications Numbering Plan 2025* alongside the *Telecommunications Service Provider*

² National Anti-Scam Centre, 'Targeting Scams' (Report, 11 March 2025) 25 <<https://www.nasc.gov.au/reports-and-publications/targeting-scams>>.

(*Customer Identity Authentication*) Determination 2022 and the *Telecommunications (Service Provider – Identity Checks for Prepaid Mobile Carriage Services)* Determination 2017. The ACMA should also consider further amendments to these instruments to strengthen protections against all forms of scams and fraud that impact telecommunications services.

In addition to the existing powers that the ACMA has at its disposal to protect consumers from scams, ACCAN strongly calls for the future development of the Scams Prevention Framework (SPF) Code to meaningfully uplift existing scam protection obligations for the telecommunications sector, consistent with the policy intent of the SPF to protect consumers from the scourge of scam losses.³

4. The ACMA should prioritise enforcement of consumer protection standards

The ACMA should continue its oversight, monitoring and enforcement of the *Telecommunications (Domestic, Family and Sexual Violence Consumer Protections) Industry Standard 2025 (DFSV Standard)* in 2026-2027.

Consumer Action Law Centre continues to see poor training across telecommunications providers' frontline teams on how to identify and support consumers experiencing DFSV. Consumers frequently contact ACCAN for support regarding DFSV matters, often after several months or years of trying to resolve the issue with their provider or the TIO.

ACCAN stakeholders have noted that they are yet to see a material uplift in telecommunications providers' responses since obligations in the DFSV Standard commenced. ACCAN's stakeholders have also expressed concerns with how the consultation requirement under Part 10 of the DFSV Standard is being implemented by telecommunications providers. We urge the ACMA to engage with frontline DFSV services to ensure ongoing workability of the obligations in the DFSV Standard.

ACCAN is also concerned about industry compliance with the *Telecommunications (Financial Hardship) Industry Standard 2024 (FH Standard)*. A TIO systemic insights report reviewing complaint data from April 2024 to March 2025 found telecommunications providers may be failing to meet minimum requirements of the FH Standard when offering consumers options for hardship assistance, and in some cases, were exacerbating hardship.⁴ ACCAN is encouraged by recent TIO quarterly complaints data which demonstrates a drop in financial hardship complaints. This recent data clearly demonstrates that direct, mandatory and enforceable regulation meaningfully improves consumer protections. However, it is important to note that the TIO continues to report potential non-compliance.⁵ Given these insights from

³ Australian Communications Consumer Action Network, *Scams Prevention Framework - Draft Law Package and Position Paper* (Submission, 16 January 2026) <<https://www.accan.org.au/accan-submission/scams-prevention-framework--draft-law-package-and-position-paper>>.

⁴ Telecommunications Industry Ombudsman, *Keeping Connected – Experiences of Telco Consumers in Financial Hardship* (Systemic investigation report) <<https://www.tio.com.au/reports/keeping-connected-experiences-telco-consumers-financial-hardship>>.

⁵ Telecommunications Industry Ombudsman, *Complaints Data Insights: Quarter 2 Report October to December 2025* (February 2026) 8 <https://www.tio.com.au/sites/default/files/2026-02/TIO_Q2_Complaints_data_insights_report_2026.pdf>.

complaints data, the ACMA should prioritise monitoring and enforcement of the FH Standard to protect vulnerable consumers from harm.

5. The ACMA should put its enduring priorities into action

ACCAN supports the ACMA's enduring priority of protecting vulnerable telecommunications customers. ACCAN strongly urges the ACMA to put its priorities into practice on an ongoing basis through its regulatory compliance and enforcement actions, working to ensure the safety and welfare of communications consumers.

The ACMA has also committed to providing advice to the Government '*where current regulatory frameworks contain gaps or present a barrier to effective outcomes*'.⁶ The ACMA has previously stated that the regulatory settings of the *Telecommunications Act 1997* (Cth) (**the Act**) are outdated and constrain its ability to take enforcement action.⁷ ACCAN considers that the ACMA should actively support and engage with the Government to reform the outdated regulatory policy of the Act. Reforming the regulatory settings of the Act to recognise the essentiality of communication services will safeguard the public interest and materially uplift consumer protections.

Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact Rebekah Palmer, Policy Officer, at rebekah.palmer@accan.org.au.

⁶ Australian Communications and Media Authority, 'Statement of Intent' (March 2025) <<https://www.acma.gov.au/publications/2023-03/plan/acma-statement-intent>>.

⁷ Australian Communications and Media Authority, *Optimal Conditions for Effective Self- and Co-regulatory Arrangements: 2015 Edition* (Report, Australian Communications and Media Authority, 1605759327) <<https://www.acma.gov.au/publications/2015-06/report/optimal-conditions-effective-self-and-co-regulatory-arrangements-2015-edition>>; Australian Communications and Media Authority, *ACMA Submission to Consumer Safeguards Review Part C: Choice and Fairness* (Submission, 25 September 2020).