

Luke Coleman, CEO Comms Alliance

Speech to CommsDay Summit

3:55pm, Tuesday 17 June 2025

Good afternoon everyone, it's great to be here speaking at my first CommsDay Summit since being appointed as CEO of Communications Alliance. Hopefully the first of many!

Today marks my 9-month anniversary at Comms Alliance, and so I wanted to take the opportunity to speak about our role, our purpose, and to provide a vision for our future as an organisation.

I'll address this in three parts.

First, I'll start with a brief history of how Comms Alliance came to be, and our role in the industry since we were formed in 2006 – almost 20 years ago.

Second, I want to talk about Comms Alliance today – and an update on reforms we are proposing to ensure that we remain relevant for the next 20 years.

And third, beyond Comms Alliance itself, I will offer a vision for where the industry should aim to be by the end of this decade and beyond.

So let me set the scene with a very brief history of Comms Alliance.

Comms Alliance was officially born on the 29th of August 2006 when its business name was changed from the Australian Communications Industry Forum.

ACIF had existed since 1997 when the Telecommunications Act was passed and enabled industry to develop its own Codes, to be registered and enforced by the regulator.

Comms Alliance still maintains Standards today that were developed by ACIF.

The name change was the result of the merger of ACIF and the Service Providers Association, or SPAN.

SPAN was an advocacy group which had been in existence since the dawn of competition in the early 90s.

One of SPAN's objectives was to “contribute constructively to the ongoing development of industry and regulatory policy.”

So from its very inception, Communications Alliance married these two important roles: first, as the body responsible for co-regulation, and second, as the body responsible for advocacy on policy and regulatory issues.

It was this marriage of regulatory and advocacy roles that formed the DNA of Comms Alliance.

Fast forward almost a decade, and in 2014 the Internet Industry Association or IIA merged with Comms Alliance.

The IIA had developed industry Codes related to online safety and the family-friendly internet filter scheme, which remains in place today under Comms Alliance.

To put this merger in historical context, it occurred just two short years after the Government's 'Convergence Review' in 2012.

It was an era where policymakers and regulators were buzzing about the 'convergence' of broadcast and traditional media with broadband and new media – what we might call digital platforms today.

The Convergence Review looked at the need for regulatory reform of the Broadcasting Act and the Telecommunications Act, as content moved from the airwaves to online.

The regulatory worlds of telcos and online services appeared to be converging.

Similarly, in 2018, national security rules once focussed purely on telecommunications were expanded to include the broader digital ecosystem.

It was in this context that Comms Alliance sought to broaden its membership to include a range of digital platforms.

The establishment of the eSafety Commissioner provoked questions about who should be regulated for online safety.

The arrival of video streaming provoked questions about who should pay network capacity.

The emergence of Over-The-Top messaging and voice services provoked questions about who should be subject to laws like lawful interception.

All of this provides important historical context for the strategic direction Comms Alliance took over the past decade.

And it sets the scene for part two of my speech: what is the role of Comms Alliance in 2025?

And what do we need to succeed over the next 20 years?

The foundation of Comms Alliance remains that marriage of regulatory and advocacy roles.

Comms Alliance is not just another lobby group.

Our DNA is in the Telecommunications Act itself.

Part 6 of the Act (Section 117) enables a body representing the industry to create Codes, to be regulated by ACMA.

Comms Alliance is that body.

Part 21 of the Act (Section 378) enables an approved Standards Development Organisation to make technical standards for the ACMA.

Comms Alliance is that body.

Our Codes and Standards are not voluntary. They are the product of the co-regulatory regime that is spelled out in L-A-W law.

But while the Act established in 1997 remains largely the same, the industry and the regulatory environment we operate in have evolved.

And so have the expectations on Comms Alliance.

Shortly after I joined, we engaged a stakeholder research firm to provide a report on Comms Alliance as seen through the eyes of our most important stakeholders.

Those surveyed included Government, regulators, consumer groups, the media, and members.

Positively, the report found that Comms Alliance was widely recognised as a strong and enduring authority on Codes and technical standards.

This is in our DNA.

But the report also made a number of findings that have shaped our approach to necessary reforms.

First, it found that our membership had become too diverse.

Our members had incompatible needs, which could lead to conflicting positions on major issues.

Our broad church had become so broad that we were unable to clearly articulate the key articles of our faith.

Second, the changing regulatory environment in recent years had stretched us too thin.

Online safety, consumer safeguards, scams, privacy, cyber security, network resilience, critical infrastructure – and that's all on top of our day-to-day work on technical standards and codes.

The sheer amount of new regulation was incomparable to the world Comms Alliance was born into in 2006.

We didn't have the resources available to cover the broad range of issues affecting our equally broad membership.

And as a result, we had a diminished capacity to advocate clear positions and to make an impact for our members.

We faced an existential question: What reforms are required to ensure Comms Alliance remains relevant?

Today, I would like to unveil some major changes to Comms Alliance to ensure we have the right foundations in place for the next 20 years.

First and foremost, we must have strategic clarity.

After more than a decade of 'convergence', it is clear to me that there is a *divergence* of policy issues affecting the telecommunications industry, and those affecting digital platforms.

A house divided cannot stand.

And so today we draw a line in the sand: Comms Alliance represents the Australian telecommunications industry.

To the exclusion of all others.

Now, this does not necessarily mean that every single member will be a telco.

Our industry also includes infrastructure, devices, and equipment suppliers, and ICT service providers, and we are well-placed to represent them as members.

But it does mean that when a member has a range of business interests both inside and outside the telecoms sector, we will represent them solely in our capacity as the voice of the telecoms industry.

This is fundamental to achieving strategic clarity.

This Thursday, our members have been invited to a General Meeting where we will seek their support to change our company name to the **Australian Telecommunications Alliance**.

This new name will leave no doubt as to who we are and who we represent – it says it right on the tin.

To any Comms Alliance members in the audience today, I appeal to you to vote in support of this change.

Our new strategic direction is much more than just a rebrand.

If we are to best represent the interests of our members, then we must have a membership that is engaged and invested in the future of the organisation.

We are not a social club.

We are not a business development opportunity.

The development of industry Codes and technical standards is a complex process. It is undertaken with the highest standards of professionalism and expertise.

Our work is dependent on an army of volunteers, and I am eternally grateful for their efforts.

We need members who are invested in Comms Alliance: intellectually, strategically, and financially.

Over the next six months, we will be pursuing changes to our membership structure and fees.

A proportion of existing members are likely to decide that we aren't the right fit for them anymore.

Hopefully, we will attract a number of new members that see value in our work and the service we provide.

Changes to our fee structure will be communicated to members in the near future, and we will seek their support for changes to membership categories at our AGM later this year.

I am confident that these changes will address the 'strategic clarity' problem highlighted by our stakeholder research.

It will also help us address the second problem – that Comms Alliance is stretched too thin.

By having a clearer, more strategically-aligned membership, we can also be clearer on the issues we pursue.

In recent years, Comms Alliance has invested incalculable hours into regulatory issues which are of tangential interest to our core telco members.

There has been a clear divergence of issues faced by telcos and digital platforms.

Online safety regulation is one example.

Codes and Standards regulated by the eSafety Commissioner include:

- social media services,
- relevant electronic services,
- designated internet services,
- search engine services,
- app distribution services,
- hosting services,
- internet carriage services, and
- equipment providers¹.

Our core telco membership is affected by only a small part of these codes, yet our staff invested a substantial amount of time into their development.

By having a more focused membership, we will be more focused on where we commit our time and energy.

Here's some perspective: over the past 12 months, Comms Alliance has responded to more than 30 public consultation processes, and we chose not to submit to a further 25.

In total, that would have been a submission every single week of the year.

And that's not even a record – in recent years we've produced more than 65 submissions. That's roughly one submission every four working days.

We must be disciplined in prosecuting the issues that are of the highest importance to our members.

So rather than chasing every rabbit down every rabbit hole, we'll group our work into three focus areas.

One: strong consumer protections.

We recently submitted the revised Telecommunications Consumer Protections, or TCP, Code.

The TCP Code is a safety net above a safety – an industry-specific set of protections that go above and beyond the Australian Consumer Law.

It will mean telcos are held to account by not just one but two regulators – the ACMA and the ACCC – for consumer protection laws.

¹ <https://www.esafety.gov.au/industry/codes/background-to-the-phase-1-industry-codes>

On top of this, we expect the Government to reintroduce its *Enhancing Consumer Safeguards* Bill, which will give the ACMA the ability to take immediate enforcement action and impose higher penalties.

Combined, this will establish the most rigorous consumer safeguards regime ever proposed by the industry.

Also under the banner of strong consumer protections, Comms Alliance is driving industry efforts to tackle scams.

We delivered the industry first scams code in 2020, and we're now working with Government and regulators to enact the Scams Prevention Framework Act.

So that's a glimpse of our work on focus area 1: strong consumer protections.

Focus area 2 is secure and resilient critical infrastructure.

Comms Alliance is driving engagement with the energy sector to prioritise telco infrastructure after power failures and natural disasters.

We're also implementing the recommendations of the Bean Review into mobile outages, working with the National Telecoms Resilience Centre in the University of Technology Sydney to implement network testing arrangements.

But the bulk of our projects to make Australia's networks secure and resilient does not get much fanfare.

It is industry Codes and standards that ensure that when you call emergency services, that call will get through.

When you port a mobile number, it will seamlessly transfer to your new provider.

When you get cabling installed, it will be built to spec.

When you're in emergency, you'll receive warning messages.

In total, close to 140 codes, standards, and guidelines to ensure that networks work.

It may not be sexy, but without this important work, Australians simply wouldn't have access to the secure and resilient telecoms services they enjoy today.

Focus area 3 is sustainable industry growth.

We face a looming investment gap in digital infrastructure that must be addressed.

Most major infrastructure-operating telcos are not making a return above their cost of capital.

And the regulatory roadblocks to building digital infrastructure get worse and worse each year.

One mobile tower funded under the Government's black spot program has been tangled up in red tape since 2015.

We've gone through four Prime Ministers before we've got planning approval for one mobile tower.

Major fibre backbone deployments face significant delays from inconsistent planning, environment, heritage, and land access laws.

And all that red tape is resulting in red ink for major telco projects.

We must have a sustainable investment environment for digital infrastructure.

Removing deployment roadblocks is one way of addressing this.

Broader regulatory reform is another.

In the past three years we have seen a great number of new regulations imposed on the industry.

But this has not been balanced by reforms to outdated regulations.

At the top of the list should be reform of regional telecoms policy.

In an environment where the industry is already facing anaemic returns, it is intolerable that industry continues to pay two separate levies to fund two separate regional safety nets at a total cost of One-and-a-quarter billion dollars a year.

I am talking about the Universal Service Obligation and the Regional Broadband Scheme, both of which are paid for by industry levies, and both of which attempt to solve the same policy problem.

The time for reform is overdue.

Comms Alliance will support regulatory reform by cleaning our own house of outdated Codes.

For example, we still have a Code regulating Mobile Premium Services, years after they went extinct.

We still maintain the IIA's iCode, which has been made redundant by the Security of Critical Infrastructure Act.

Less red tape, and more regulatory reform will be important steps in creating a sustainable investment environment for telcos.

And this brings me to third and final part of my speech: where does the telecoms industry want to be at the end of this decade?

It's less than five years away.

In 2030, we have a vision for an Australian telecoms industry that has earned the trust of our customers.

Today, two of the top ten most distrusted brands in Australia are telcos.

By 2030, we should have the ambition of being listed among Australia's most trusted brands².

The industry should take pride in the fact that complaints are consistently at their lowest levels in twenty years.

The last time complaints were this low, Comms Alliance didn't even exist yet. But we can still do more.

And in 2030, we have a vision for an Australian telecoms industry that is regarded by policymakers as pivotal to productivity.

The Government has made productivity the centrepiece of its ambitions for this term of Parliament.

It is digital infrastructure that will enable AI, which has the capacity to revolutionise productivity across every sector of the economy.

But this infrastructure will only be built if there is a sustainable investment environment to support it.

As a nation, do we want a future where a handful of multinational tech giants own and control the digital infrastructure that powers AI?

Australia's gross domestic product is smaller than the market cap of any one of the global tech giants.

A productivity agenda needs to recognise the importance of a strong digital infrastructure market that not only drives economic growth, but also protects our sovereignty.

And so I'll conclude with a brief recap of my key points today.

² <https://www.roymorgan.com/findings/9826-risk-monitor-quartely-update-december-2024>

First, Comms Alliance has a history stretching back 20 years as an industry body that marries the dual roles of regulation and advocacy.

Second, for Comms Alliance to remain relevant for the next 20 years, we must reform the organisation to have strategic clarity, focus, and members that are invested in our strategy.

And third, we have a vision for the Australian telecoms industry that will set us up for success in 2030 and beyond.

Thank you.