



## **2018 TCP Code Revision – Communications Alliance consultation**

**Submission by Aussie Broadband**

**August 2018**

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## About Aussie Broadband

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Aussie Broadband is a small, high quality internet service provider based out of the Latrobe Valley in Gippsland, Victoria.

To date, we are the only ISP outside the big four to build a network to all 121 NBN POIs across Australia. We provide services via all NBN technologies other than satellite with a focus on a high quality network and all-Australian support.

## Summary of submission

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Generally, Aussie Broadband is satisfied with the proposed changes to the TCP Code. We strongly believe in a no bull approach to customer service.

Aussie Broadband would like further clarity on two particular points in the general rules section.

## General rules

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3.1.3: A Supplier must provide reasonable assistance to Consumers to obtain help in languages other than English when needed.

We believe that this paragraph is unclear for both consumers and suppliers about what sort of assistance can be expected, and would very much appreciate some further guidance (or a practical example).

Does it mean:

- a) the supplier itself must provide translated or interpreted materials/services? If so, what constitutes “reasonable assistance”? OR
- b) the supplier must have a handy list of places where a consumer can go to have materials translated or interpreted?

If a), we then fall back on the interpretation of “reasonable assistance”. Does this mean translated printed materials, or phone interpretation services, or translated Live Chat, or some other option?

We note that:

- Under our value of “being good to people”, Aussie Broadband has already investigated the possibility of providing interpreted phone services for customers for whom English is not a first language
- We found that because we are a private firm, we do not qualify for the Translating and Interpreting Service (TIS National) provided by the Department of Home Affairs. We note that Telstra does qualify for this service, we assume because of its responsibilities under the Universal Services Obligation for standard telephone services. We believe there is a broader question of whether service this should be extended to all broadband providers.

- If we cannot access TIS National, we would need to pay a private provider. We have estimated the cost of this as averaging at \$50 a call. We would need to either:
  - absorb the cost ourselves (which, as a smaller telco, is well beyond our financial capacity), OR
  - pass the cost onto the consumer (also likely beyond their capacity to pay).
- As a practical alternative, we are investigating changing over our website’s live chat platform to live, two-way language translation. Whilst this is slightly more expensive than our current platform, and it would be machine-assisted rather than human-assisted, we believe it’s a reasonable option. The question is, would it qualify as “reasonable assistance” as defined in para 3.1.3?

3.2.1 – A Supplier must ensure that any information provided or made available to Consumers is clear, accurate, free of material omissions, relevant, current, readily accessible, and, in cases where information is provided, timely.

Again, we would like to seek some clarification on what “readily accessible” means in this paragraph, particularly in the context of paragraph 3.1.3.

Currently we provide information to consumers via our website, telephone (including the National Relay Service), email, live chat, social media, and via print or large print on request. All our materials are written in Plain English.

Does “accessible” mean:

- information in other languages, including braille, Easy English and Auslan, and/or
- other delivery formats other than those we mention above

Does “readily” mean:

- available on request, OR
- available immediately via online or phone or in person, OR
- some other interpretation?

## Contacts

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We welcome further direct discussion on the matters raised. For more information, please contact:

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