

Consumer Safeguards Review
Department of Communications and the Arts
GPO Box 2154
CANBERRA ACT 2601
By email: consumersafeguardsreview@communications.gov.au

22 January 2019

Dear Review Chair

The Benevolent Society (TBS) congratulates the Department of Communications and the Arts for undertaking the important Review of Consumer Safeguards in telecommunications and is pleased to offer some brief comments on Part B – Reliability of Services.

As Australia's first charity, our vision is a just society where everyone lives their best life. We have supported people with disability, children, families, older Australians and carers since 1813. Our dedicated staff team, network of service providers, partners and volunteers have close relationships with our clients, giving us insights into their day to day lives and needs, including as consumers of goods and services.

We speak up for the rights and needs of our clients when opportunities such as your review arise, and more generally through our systemic advocacy campaigns and partnerships.

Many TBS clients experience a range of consumer vulnerabilities – including in accessing telecommunications – such as poverty, health status, low levels of technological literacy or barriers associated with geographic location. Reliable, affordable, accessible telecommunications are critically important to their health, safety and social inclusion.

Therefore, we wish to support both the general direction and specific recommendations contained in the submission from ACCAN to the Departmental Consumer Safeguards Review – Part B/Reliability of Services.

As a provider of services in the home to people with disability and older Australians we especially support Recommendation 3 from ACCAN regarding protections for customers with a diagnosed life-threatening medical condition.

TBS also supports the view expressed by ACCAN that telecommunications are an essential service and that the protection of consumers in essential services is paramount. We consider the current consumer protection framework is no longer fit-for-purpose or adequate to meet the needs of consumers in the existing and emerging telecommunications markets and encourage you to adopt ACCAN's recommendations to address this problem.

Yours sincerely



Kirsty Nowlan
Executive Director, Strategic Engagement Research & Advocacy