



## **What do you think is currently working well?**

## **What do you think could be improved and how?**

Our most significant concern is that the TDR is simply not meeting the level of need that exists. They consistently have a relatively low number of enquiries and very low number of complaint resolutions compared to the issues that exist for consumers in the telecommunications sector. In the 2019/20 year it assisted with 2802 enquiries (which is the highest number in the last five years). This is a very low number of enquiries compared to both the evidence about the scale of the problem in NZ and compared to overseas evidence. In comparison for the same time period the Australian Telecommunications Industry Ombudsman dealt with 318,797 enquiries and 127,151 complaints. Our own client enquiry data consistently highlights telecommunications as a key area of high consumer complaints. The National Consumer Survey (run by Consumer Protection) showed that 20% of consumers experienced a problem with their mobile telecommunication service and 31% of consumers experienced a problem with their home based telecommunication service. According to the consumer survey, only 50% of these problems were resolved to the consumers satisfaction. Together this all points to our primary concern, which is that the current TDRS is significantly underperforming in reaching the consumers who could benefit from their help.

We are concerned that the bar to entry to the scheme is too high, with the scheme assisting people either once they have reached a deadlock or when “the telecommunications provider also needs to have been given a reasonable amount of time respond to the complaint – at least six weeks”. It’s simply unrealistic for consumers to have to wait for six weeks of inaction from a telecommunication provider before they can elevate their request. We would support this being much shorter, so that people can access the TDRS in a timelier manner.

Our view in general is that many dispute resolution schemes place too much emphasis on the requirements that consumers must meet in order to be formally eligible for assistance to the scheme, rather than trying to make themselves as accessible as possible.

We also have concerns about the level of engagement with the TDRS and consumer stakeholders. As a national organisation which supports over 1500 clients a year with telecommunications issues we have had almost no interaction with the TDRS, either in terms of promoting awareness of the service or the TDRS seeking to understand the nature of the client enquiries that we are dealing with. Certainly our experience with clients is that very few of them are aware of the TDRS when they approach us.



Reviewing our enquiries about client interactions with the TDRS some of the issues that keep coming up include:

- Confusion about the role of the TDRS in relation to hardware, especially problems with mobile phones, which aren't working correctly.
- Confusion about the role of the TDRS in relation to dealing with complaints around pricing and what the TDRS can help with in relation to this.

It would be good for the TDRS to be much clearer about what they can help with in relation to these two areas.

The other issue which commonly comes up for clients is where their complaint relates to an issue where multiple providers play a role, e.g. Chorus and a retailer.

## **Are there any other ways you think the TDRS could be improved for the benefit of consumers?**

Our view is that there are significant downsides to having a voluntary scheme. We would like to see active consideration of whether the TDRS operating as a voluntary scheme is fit for purpose. One of our main concerns is that operating a voluntary scheme creates the wrong incentives for the scheme to be as effective as it should be, because the scheme is reliant on keeping its members on side.