

Complaint Management Policy for General Customer Complaints

Telstra Wholesale has a formal complaint management process in place to ensure that Telstra Wholesale customers' complaints are dealt with expeditiously and appropriately.

Telstra Wholesale customers are Carriers, Carriage Service Providers, Access Seekers and Internet Service Providers. We will not accept or deal directly with complaints from our customers' end users but will address end user complaints referred to us by their Service Provider.

This policy describes the general customer complaints process. Importantly, there are separate complaint management processes for complaints regarding Regulated Services¹ made under the Structural Separation Undertaking (SSU). For further information about these processes please go to <https://www.telstrawholesale.com.au/why-telstra-wholesale/structural-separation-undertaking.html>.

What is a Complaint covered by this policy?

A customer complaint is any dissatisfaction or grievance about any telecommunications activity that cannot be resolved under existing routine customer management processes and/or operational processes for day-to-day customer contact. This may include a complaint made by a Telstra Wholesale customer on behalf of its end user.

What types of interactions are not covered by this policy?

Some types of customer interactions with Telstra Wholesale are managed under separate processes and in the first instance are not covered by this policy. These include:

- a request for information;
- a fault being reported for the first time;
- a fault escalation;
- customer compensation claims;
- customer billing enquiries and billing disputes;
- claims for Customer Service Guarantee contribution;
- claims for Customer Service Level Agreements/Guarantees;
- routine escalations, fast tracks or enquiries by a customer;
- customer issues and/or enquiries raised in service review meetings; or
- disputes in the nature of contractual disputes under your access agreement with us.

However, if your end user has a grievance or is dissatisfied with the way Telstra Wholesale has managed your enquiry on their behalf under the relevant processes, the complaint should be treated in accordance with this policy and its associated procedures.

As detailed above, all Equivalence Complaints (as defined in the SSU) concerning Regulated Services under the SSU utilise separate processes. Please refer to the following link: <https://www.telstrawholesale.com.au/why-telstra-wholesale/structural-separation-undertaking.html>.

¹ Regulated Services include Wholesale Line Rental, Fixed Originating Access Service, Fixed Terminating Access Service, Local Carriage Service, Domestic Transmission Capacity Service, Line Sharing Service, Wholesale ADSL Layer 2 Service, ULLS, and TEBA.

How do I lodge a Complaint?

If you have attempted to resolve your general enquiry via existing routine customer management processes and/or operational processes for day-to-day customer contact and your end user has expressed their dissatisfaction or grievance with you, you may lodge your complaint by using the Telstra Wholesale online complaint form which you can access via the Telstra Wholesale Customer Portal.

What information is required to complete a complaint form?

Particular information is required to assist Telstra Wholesale in processing your complaints in an efficient and timely manner². We will require the following information in order to log a complaint:

- **Type of Complaint**

Billing, Churn, Fault, Provisioning, Pricing or Other

- **Service Provider Details**

Type of Provider: Carrier, CSP, Reseller or ISP

Your Company Name

Your Contact details: name, phone number and email address

- **Complaint Details**

Service Number

Claimant Details: name and Contact phone number

Complaint Description

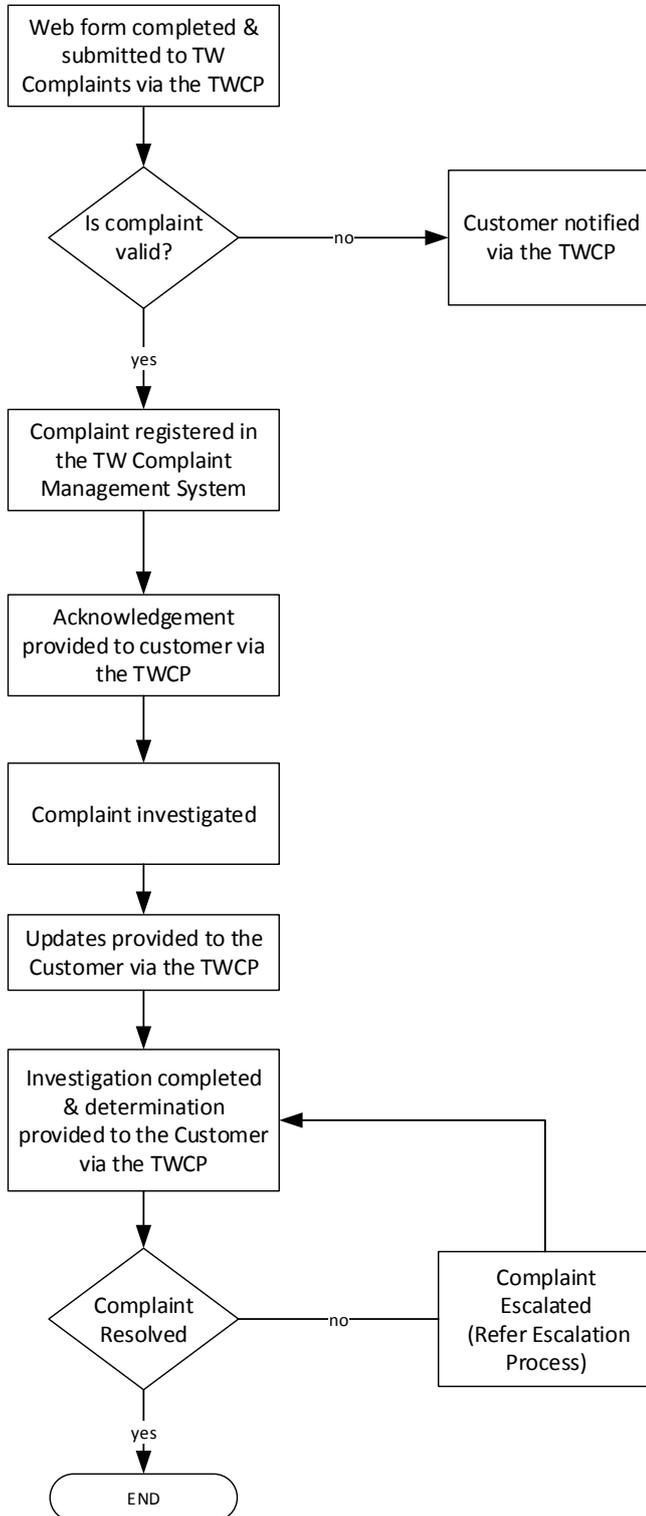
- **Incident Location Address**

This section is only mandatory for Fault or Provisioning type complaints.

TW reference number: Fault number or Order Number

² Separate information may be required for Equivalence Complaints under the SSU and a separate process applies to these complaints. Further information about these complaint processes can be found by accessing the following link <https://www.telstrawholesale.com.au/why-telstra-wholesale/structural-separation-undertaking.html>.

General Complaints Process for non-SSU related complaints



How is a general customer complaint processed?

Telstra Wholesale will observe the following principles and imperatives in the management of general non-SSU related customer complaints:

- Wherever possible, complaints will be resolved at the first point of contact.
- You will be advised of proposed actions and expected timeframes and the progress of the resolution of the complaint.
- If Telstra Wholesale requires time to investigate a complaint, we will contact you as soon as information becomes available, usually within five business days of your complaint being lodged.
- You will be given a written response to your complaint from Telstra Wholesale.

How can I get an update on the progress of my general customer complaint?

Any enquiries about the progress of a general customer complaint can be directed to the Telstra Wholesale Complaints Team via the TWCP. When calling regarding any outstanding complaint, please quote the Telstra Wholesale reference number as this will help us to locate the complaint quickly and address your enquiry promptly.

What rights do I have under my Telstra agreements?

Telstra Wholesale manages supply of services under a range of supply contracts. In addition to the complaints processes available under the SSU, your contract(s) with Telstra Wholesale may include formal dispute management provisions, with which both Telstra and your company must comply, unless otherwise agreed. This policy does not alter those arrangements. It does, however, set out an alternative for resolution of complaints without recourse to those formal processes and also guides how Telstra will manage complaints falling outside those processes. A complaint under this policy may turn into a "dispute" under your customer contract. If that happens, you should use the dispute resolution procedures under your customer contract to have the dispute resolved. You can do this at any point in the process described in this policy.

How can I escalate the complaint if I am not satisfied?

Our goal is to deliver quality and timely customer service. If you don't obtain the resolution you desire, you have a number of options for escalation, as detailed below. If you are not satisfied with the resolution, or if you feel that you have not received a fair hearing, your complaint will be escalated to a supervisor or manager. He or she will review your complaint and the resolutions offered and discuss the complaint with you.

Many of Telstra Wholesale's customer agreements set out formal dispute resolution mechanisms, typically involving an independent expert and/or a mediator. Use of these mechanisms may be mandatory before regulatory or legal intervention can be sought. You will need to refer to your agreement(s) to determine what mechanisms apply. As set out above, if a complaint turns into a dispute under your wholesale contract, you can use the dispute resolution procedures in your contract to have the dispute resolved (even if you have started using the complaints procedure under this policy).

Even where there is not a clear dispute resolution mechanism in your contract, it might be appropriate for us to agree on a customised process to resolve a particular complaint. You are welcome to discuss this with your Telstra Wholesale Account Manager.

If your complaint relates to an Equivalence Complaint, please refer to the information located at <https://www.telstrawholesale.com.au/why-telstra-wholesale/structural-separation-undertaking.html>

If your complaint is not resolved to your satisfaction by Telstra Wholesale, you may refer your complaint to a number of organisations who can address your concerns. Depending on the nature of your complaint, the appropriate organisation might be:

- **Communications Alliance LTD (CA)** <http://www.commsalliance.com.au/home>
- **Australian Competition and Consumer Commission (ACCC)** <http://www.accc.gov.au/>



- **Australian Communications and Media Authority** <http://www.acma.gov.au/>
- **Australian Direct Marketing Association (ADMA)** <http://www.adma.com.au/>
- **Independent Telecommunications Adjudicator (ITA)**

End user complaints referred to us by their Service Provider

End users whose complaints were referred to us by you and were not resolved to their satisfaction can be referred to the following organisations who can address their concerns.

Complaints by residential consumers or small businesses about landline telephone, mobile or internet service, or damage to property by a service provider can be referred to the:

- **Telecommunications Industry Ombudsman (TIO)** www.tio.com.au

Complaints about the handling of an end user's personal information can be referred to the:

- **Office of the Australian Information Commissioner (OAIC)** <https://www.oaic.gov.au/>

Complaints about the message content and advertising of any telecommunication service with the prefix "190" can be referred to the:

- **Telephone Information Services Standards Council (TISSC)** <http://www.190complaints.com.au/>

Telstra Wholesale Complaints Team contact details

Phone: 1300 887 370

Business hours: 8:30am to 5.00pm Mon-Fri

Email: twcomplaints@team.telstra.com