

Business Reporting Requirements Inquiry
Productivity Commission
Level 8, Two Melbourne Quarter
697 Collins Street
Docklands Vic 3008, Australia

30 September 2026

To: Productivity Commission, Business Reporting Requirements Inquiry

Re: Comment Sought on Update to Business Reporting Requirements

The Australian Communications Consumer Action Network (**ACCAN**) welcomes the opportunity to comment on the initial stage of the Productivity Commission (**the Commission**)'s inquiry into business reporting requirements.

ACCAN is the peak national consumer organisation advocating for trusted, accessible, inclusive, affordable and available communications and digital services for all Australians.

ACCAN supports efficient reporting and the Commission's principle of "tell us once". It is worthwhile to routinely assess whether the cost of reporting is reasonable, and to reduce instances where businesses provide the same or similar information to multiple agencies or regulators, or where obligations, definitions and reporting periods are inconsistent.

As a general principle, however, any reduction, streamlining or amalgamation of non-financial business reporting requirements cannot – and should not – negatively impact consumers through diminished transparency, protections or accountability.

As the Commission identified, non-financial reporting makes the operations of businesses visible – and thus accountable – to various stakeholders.¹ As such, reducing the transparency of reporting curtails the ability of regulators and advocates to monitor risks and address harms to consumers. In addition, insufficient reporting disempowers consumers by reducing their ability to identify and endorse businesses which align with their interests and values and divest from the ones that don't.

Within the telecommunications sector, substantial gaps persist in the reporting framework which weaken the ability of both the Australian Communications and Media Authority (**ACMA**) and the Australian Competition and Consumer Commission (**ACCC**) to proactively monitor compliance and take enforcement action.

¹ Productivity Commission, *Call for Submissions - Business Reporting Requirements* (Call for submissions. September 2026) 3.

These gaps in the telecommunications sector include:

- No comprehensive reporting of mobile network performance.
- Highly limited retail performance reporting for the mobile sector.
- Fragmented reporting of Triple Zero failures.²

These regulatory gaps place the telecommunications sector behind other, comparable essential services. In the energy sector, for example, the Australian Energy Regulator (**AER**) publishes Annual Information Orders which require electricity distributors to report on a variety of core categories. These categories include customer numbers, network metrics, capital expenditure and operational outputs.³ Additionally, the AER's retail performance reporting framework measures the performance of energy retailers in the market and analyses energy affordability.⁴

As telecommunications is an essential service underpinning public safety, it is important to mandate sufficiently robust reporting requirements to make the market visible to regulators seeking to proactively address emerging harms to consumers. As such, ACCAN recommends that wherever reporting thresholds are changed, or requirements are simplified, consolidated or moved, the information available to consumers should be maintained or improved. Further, with some very limited exceptions, ACCAN does not support different thresholds for non-financial reporting requirements for small telecommunications providers versus large providers. Where the connectivity service provided to the end-user is the same, small providers should not benefit from less rigorous reporting requirements, where it would significantly decrease transparency and accountability to the detriment of consumers.

Finally, we note that the Terms of Reference call for the Commission to have regard to any upcoming legislative reviews. Currently, the Triple Zero Custodian is undertaking a review of all legislation and regulation related to Triple Zero.⁵ Additionally, the ACCC is conducting a review of record keeping rules as part of the requirements of the *Competition and Consumer Act 2010*,⁶ and the ACMA is also developing an enforceable industry standard to replace the Telecommunications Consumer Protections Code.⁷ ACCAN cautions the Commission that any recommendations to reduce reporting in this sector while these processes are ongoing could create unnecessary fragmentation and uncertainty for stakeholders.

² Australian Communications Consumer Action Network, 'Triple Zero Legislative and Regulatory Review' (Submission, 30 June 2026) 16 <<https://www.accan.org.au/accan-submission/triple-zero-legislative-and-regulatory-review%C2%A0>>.

³ Australian Energy Regulator, 'Annual Information Orders 2024-25 to 2027-28' (Webpage, April 2024) <<https://www.aer.gov.au/industry/register/resources/instruments/annual-information-orders-2024-25-2027-28>>.

⁴ Australian Energy Regulator, 'Retail Performance Reporting Procedures and Guidelines' (Webpage, July 2025) <<https://www.aer.gov.au/industry/register/resources/guidelines/retail-performance-reporting-procedures-and-guidelines>>.

⁵ Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts, 'Triple Zero Legislative and Regulatory Review' (Webpage, March 2026) <<https://www.infrastructure.gov.au/media-communications/phone/triple-zero-custodian/triple-zero-legislative-and-regulatory-review>>.

⁶ Australian Competition and Consumer Commission, 'Record Keeping Rules Review 2025' (Webpage, July 2025) <<https://www.accc.gov.au/by-industry/telecommunications-and-internet/telecommunications-industry-record-keeping-and-reporting-rules/record-keeping-rules-review-2025>>.

⁷ Australian Communications Consumer Action Network, 'Triple Zero Legislative and Regulatory Review' (Submission, 30 June 2026) <<https://www.accan.org.au/accan-submission/triple-zero-legislative-and-regulatory-review%C2%A0>>.



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We thank the Commission for the opportunity to comment on its inquiry into business reporting requirements. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact Sophie Regan, Assistant Policy Officer.

Yours sincerely

Carol Bennett
Chief Executive Officer

The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers. ACCAN is committed to reconciliation that acknowledges Australia's past and values the unique culture and heritage of Aboriginal and Torres Strait Islander peoples.