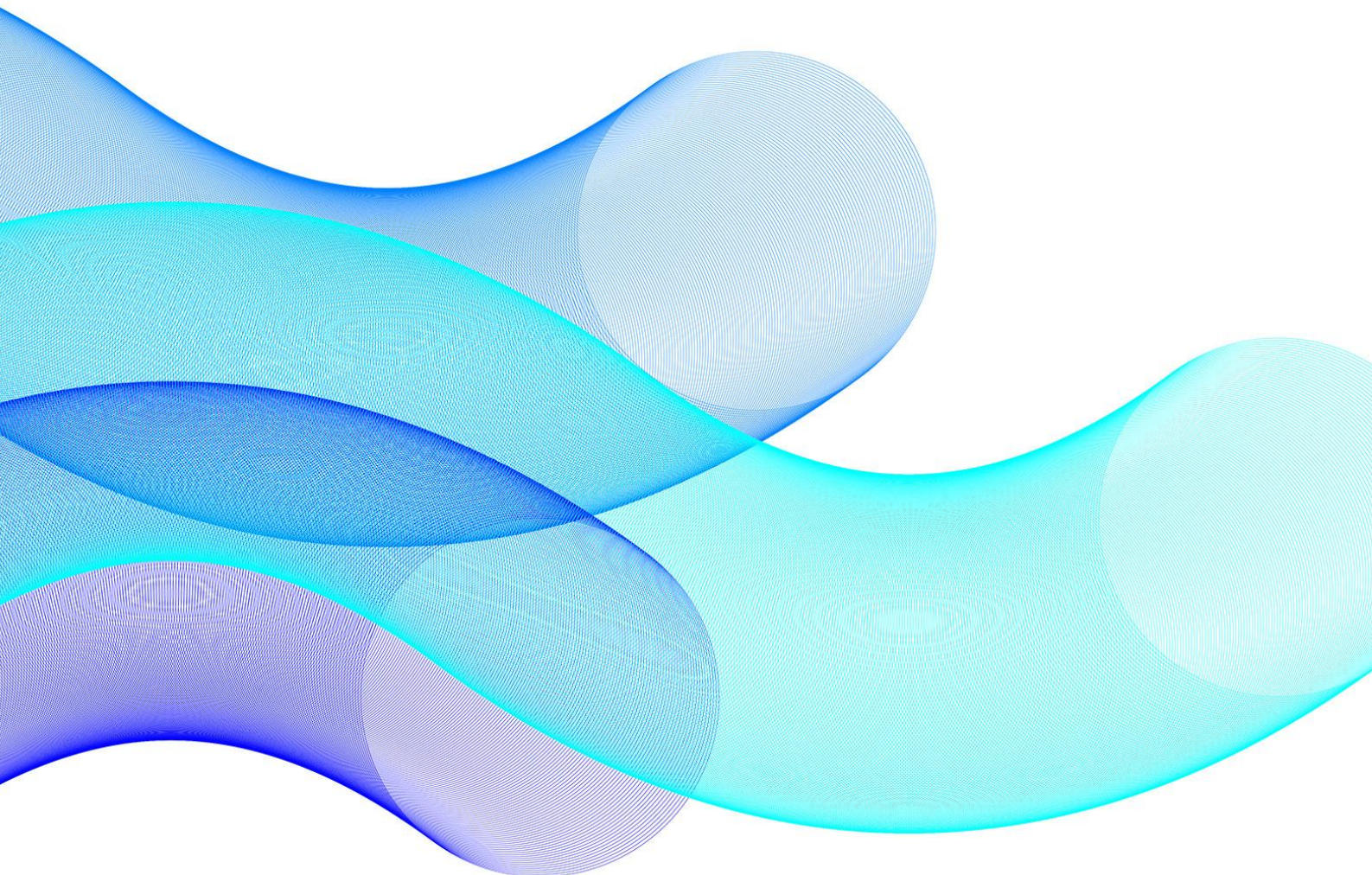

Business Reporting Requirements Vocus Submission

30 September 2026



About Vocus

Vocus, Australia's specialist fibre and network solutions provider, owns and operates 50,000km of secure, high-capacity fibre connecting all Australian mainland capitals with New Zealand, Asia, and the USA. Beyond the fibre network, Vocus operates a growing network of submarine cables spanning nearly 15,000kms that includes the Australia Singapore Cable, North-West Cable system, the Darwin-Jakarta-Singapore system, and the PPC-1 cable from Sydney to Guam.

Vocus' national fibre backbone also provides the foundational infrastructure for Starlink's Low Earth Orbit (LEO) satellite service – enabling revolutionary high-speed connectivity to 100% of Australia's landmass, no matter how remote.

Vocus owns a portfolio of well recognised brands catering to enterprise, government, wholesale, small business and residential customers across Australia.

For more information, visit vocus.com.au.

Executive Summary

Vocus welcomes the opportunity to respond to the Productivity Commission's Inquiry into *Business Reporting Requirements*.

Vocus recognises the important role of business reporting to enable regulators to perform their functions and improve the delivery of services to the public. While we support the use of reporting as a policy tool, we are concerned by the increasing volume of reporting obligations being introduced through separate regulatory initiatives.

As previously identified by the Productivity Commission, the telecommunications sector should be prioritised for a root-and-branch regulatory review.¹ Telecommunications providers operate capital-intensive networks within a highly complex regulatory framework comprising more than 500 legislative and regulatory instruments, of which 200 are sector-specific.

At the same time, the sector is a critical dependency to delivering the fibre and digital infrastructure needed to support Australia's digital infrastructure growth, connect data centres and enable the adoption of Artificial Intelligence (AI).² Despite the sector's strategic importance, there is no coordinated regulatory mechanism to manage the growing pipeline of regulatory initiatives and associated business reporting requirements.

This submission outlines 4 priority recommendations about telecommunications-specific reporting requirements:

- **Recommendation 1:** Prioritise a root-and-branch review of telecommunications regulation, including business reporting requirements.
- **Recommendation 2:** Establish a regulatory initiatives grid to improve coordination of the regulatory pipeline.
- **Recommendation 3:** Require all new reporting obligations to be supported by a cumulative reporting burden assessment.
- **Recommendation 4:** Sunset reporting requirements introduced to validate the effectiveness of new regulatory schemes unless an ongoing need can be demonstrated.

Vocus also supports the recommendations made by the Australian Telecommunications Alliance (ATA). To deliver the digital infrastructure required to support Australia's productivity and AI ambitions, the telecommunications sector needs a more coordinated and strategic regulatory approach, supported by a coordinated regulatory initiatives grid.

¹ Productivity Commission, 'Creating a more dynamic and resilience economy' (19 December 2025) recommendation 2.1 <<https://www.pc.gov.au/inquiries-and-research/resilient-economy/report/>>.

² Vocus, 'Submission 85: Vocus Response – Joint Select Committee on Artificial Intelligence' (14 September 2026) <https://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Artificial_Intelligence/ArtificialIntelligence/Submissions>.

Questions for comment

Information request 4 – Other non-financial reporting requirements

Do any reporting requirements other than payment times reporting, sustainability and environmental reporting and workplace gender equality reporting that warrant particular attention by this inquiry?

- What are the main upfront and ongoing compliance costs of these other requirements?
- What changes to reporting requirements, processes or mechanisms could reduce costs and data duplication?
- How is the reported information used by stakeholders, and how does it affect their decisions, activities or outcomes?

Please provide worked examples and evidence to support your responses.

Recommendation 1: Prioritise a root-and-branch review of telecommunications regulation, including business reporting requirements.

Despite significant technological change across the telecommunications sector, there has not been a comprehensive review of telecommunications regulation for several years. This has resulted in an increasingly complex regulatory environment that imposes substantial administrative burden without consistently demonstrating commensurate benefits for consumers. Without a broader review of existing obligations, the growing volume of regulatory requirements risks diverting resources away from investing in the digital infrastructure needed to support Australia's productivity and AI ambitions.

Taken together, these obligations impose a substantial cost that extends far beyond preparing and lodging individual reports. Each requirement needs a supporting compliance architecture, comprising data and systems, skilled personnel, governance and approvals, assurance processes, privacy and cyber security controls, regulatory calendars, and coordination with third parties.

These cumulative costs are difficult to capture through regulatory impact assessments focused on individual measures. However, their effect is real: the growing volume of reporting diverts finite resources and organisational attention away from investment and delivery of digital infrastructure and essential services, with direct consequences for productivity and economic growth. A root-and-branch review is a critical first step to assessing the effectiveness of telecommunications regulation and reporting requirements, and identifying opportunities for targeted deregulation.

Information request 5 – Significant interactions between reporting requirements

Which types of interactions between non-financial reporting requirements are most prevalent and burdensome for businesses to navigate? For example:

- obligations to report identical data or information to different reporting bodies
- obligations to report very similar data or information to different reporting bodies
- inconsistent definitions, thresholds or classifications that make it unclear which requirements do and do not need to be reported against
- inconsistencies in which entity within a corporate group needs to report (for example, some reporting requirements attaching to subsidiaries and others to parents)
- misaligned reporting periods
- aligned reporting periods
- simultaneous changes to multiple reporting requirements?

Please provide specific examples of these interactions and evidence of how prevalent and burdensome they are.

For which types of businesses (if any) have reporting burdens become especially large, and what is the contribution of non-financial reporting requirements to this? Which sources of data or forms of analysis could best answer these questions?

What evidence is there of step changes in reporting burdens over time that could indicate the effects of particular requirements being introduced?

Recommendation 2: Establish a regulatory initiatives grid to improve coordination of the regulatory pipeline.

The telecommunications sector urgently needs a centrally coordinated regulatory initiatives grid to improve the coordination of regulatory reform.

In highly regulated industries, effective coordination between regulators and policymakers is critical. We have seen this demonstrated across the financial services industry, where the Federal Treasury maintains a regulatory initiatives grid that provides a forward-looking view of priorities and enables coordination across multiple regulators.³ Similarly, the Australian Energy Market Operator maintains the National Energy Market Reform Implementation Roadmap.⁴

By contrast, the telecommunications sector has undergone significant amounts of regulatory change in recent years without central oversight. While each proposal may be justified on its own merits, reforms are often progressed concurrently with limited assessment of the interactions between frameworks.

Without centralised coordination, there is growing risk of overlapping or conflicting obligations instead of a 'tell us once' approach to business reporting. For example, throughout 2026 the telco sector consulted on several new and/or amended reporting obligations, including (without limitation):

- **February 2026:** The ACMA consulted on amendments to the TCCO Standard requiring carriers and carriage service providers (CSPs) to publish registers of historic outage data on their websites.⁵
- **March 2026:** The ACCC consulted on new *Wholesale and Networks Record Keeping Rules* (RKR).⁶
- **April 2026:** The ACCC consulted on extending the *Superfast broadband access service (SBAS) declaration inquiry 2025*, including associated record-keeping obligations.⁷ Note, the ACCC separately consulted on introducing an SBAS RKR in late 2025.
- **June 2026:** The Triple Zero Custodian consulted on the E000 legislative review, including proposals to introduce new performance reporting for carriers and CSPs.⁸
- **June 2026:** The Treasury consulted on new *Scams Prevention Framework* (SPF) instruments, including new record keeping requirements.⁹
- **July 2026:** The Department of Home Affairs consulted on amendments to the SOCI Act, including changes to cyber incident reporting and Part 2D notifications.¹⁰
- **August 2026:** The ACCC consulted on amendments to the *Infrastructure RKR*.¹¹
- **September 2026:** The ACMA requested industry feedback on the template and guide for new SMS Sender ID quarterly reporting under the *Telecommunications (SMS Sender ID Register) Industry Standard 2025*.
- **September 2026:** The Attorney General's Department consulted on amendments to the *Privacy Act 1988* (Cth) affecting data collection, use and retention requirements.¹²
- **October 2026:** The ACCC is consulting on a new *Retail RKR*.¹³

³ Australian Government Productivity Commission (n 1).

⁴ Australian Energy Market Operator, 'NEM Reform Initiative Roadmap' (21 October 2025) < <https://www.aemo.com.au/initiatives/major-programs/nem-reform-implementation-roadmap> >.

⁵ Australian Communications and Media Authority, 'Proposed public register of telecommunications outages' (18 February 2026) < <https://www.acma.gov.au/consultations/2026-01/proposed-public-register-telecommunications-outages> >.

⁶ Australian Competition and Consumer Commission, 'Wholesale and Networks Record Keeping Rules' (27 March 2026) < <https://www.accc.gov.au/by-industry/telecommunications-and-internet/telecommunications-industry-record-keeping-and-reporting-rules/wholesale-and-networks-record-keeping-rules/consultation-on-wholesale-and-networks-record-keeping-rules> >.

⁷ Australian Competition and Consumer Commission, 'Superfast broadband access service (SBAS) declaration 2025' (14 April 2026) < <https://www.accc.gov.au/by-industry/telecommunications-and-internet/non-nbn-fixed-line-services-access-regulation/superfast-broadband-access-service-sbas-declaration-inquiry-2025/draft-report> >.

⁸ Triple Zero Custodian, 'Triple Zero Legislative and Regulatory Review' (23 June 2026) < <https://www.infrastructure.gov.au/media-communications/triple-zero-custodian/triple-zero-legislative-and-regulatory-review> >.

⁹ Treasury, 'Scams Prevention Framework code and rules exposure draft' (25 June 2026) < <https://consult.treasury.gov.au/c2026-765133> >.

¹⁰ Department of Home Affairs, 'Streamlining and Modernising the Security of Critical Infrastructure Act 2018' (31 July 2026) < <https://www.homeaffairs.gov.au/how-to-engage-us-subsite/files/consultation-on-proposed-amendments-to-streamline-and-modernise-the-soci-act-2018/consultation-paper.pdf> >.

¹¹ Australian Competition and Consumer Commission, 'Audit of telecommunications infrastructure assets record keeping rules' (12 August 2026) < https://www.accc.gov.au/by-industry/telecommunications-and-internet/telecommunications-industry-record-keeping-and-reporting-rules/audit-of-telecommunications-infrastructure-assets-record-keeping-rules/2026-infrastructure-record-keeping-rules-amendment-consultation?utm_source=ACCC+subscribers&utm_campaign=de043f316f-EMAIL-CIN-new-a2p-sms-rkr-6-july-2026_COPY_01&utm_medium=email&utm_term=0_-8cd7311dc6-577716902 >.

¹² Attorney-General's Department, 'Privacy Reform – Consultation on Exposure Draft Legislation' (18 September 2026) < <https://consultations.ag.gov.au/rights-and-protections/privacy-reform/> >.

¹³ Australian Competition and Consumer Commission, 'Retail telecommunications record keeping rule' (7 October 2026) < https://www.accc.gov.au/by-industry/telecommunications-and-internet/telecommunications-industry-record-keeping-and-reporting-rules/retail-telecommunications-record-keeping-rule/consultation-on-retail-telecommunications-record-keeping-rules?utm_source=ACCC+subscribers&utm_campaign=6b56fc3dd5-EMAIL-CIN-retail-telco-rkr&utm_medium=email&utm_term=0_-8cd7311dc6-577716902 >.

- **October 2026:** The ACMA is consulting on the new Telecommunications Consumer Protections Code, including new obligations to provide quarterly reports on mis selling.¹⁴

The volume and complexity of these reforms demonstrates the need for a centrally managed regulatory initiatives grid. This mechanism would provide a practical mechanism to identify overlap or inconsistency and to better understand the cumulative burden of reform.

The absence of a regulatory grid creates duplication, uncertainty and potential conflict between reforms. For example:

- **Inconsistent definitions of 'outages':** The TCCO historical outage register requires reporting on unplanned 'Major Outages' and 'Significant Local Outages'. By contrast, the SBAS Final Access Determination requires SBAS providers to report on 'the number of network outages, including planned and emergency outages' without aligning the definition of 'outage' to the TCCO. As a result, providers cannot leverage the same datasets or reporting processes and must maintain separate reporting frameworks for similar information.
- **Overlapping outage reporting regimes:** The ACMA's TCCO historical outage register was introduced before the completion of the Triple Zero legislative review. The Triple Zero Custodian is now considering additional outage and network performance reporting obligations. Greater coordination could have ensured these initiatives were developed together, reducing the risk of duplication and inconsistent reporting requirements.
- **Conflicting data collection approaches:** The proposed Retail RKR would require providers to collect and report significant volumes of service-level information, including geographic data. At the same time, privacy reforms propose stronger limitations on the collection, retention and use of personal information, including geographic data. While both reforms pursue legitimate policy objectives, the consultations progressed concurrently, leaving limited opportunity to assess their cumulative impact and interaction.

Vocus acknowledges that each reform is intended to address a legitimate policy objective, and we welcome the opportunity to engage constructively with regulators and policymakers. However, without a central mechanism to sequence reforms and assess interactions between regimes, industry is required to manage an increasingly high volume of change over compressed timeframes, as well as potentially duplicative or conflicting obligations.

Information request 6 – Ways of ameliorating negative interactions between reporting requirements

How could burdens arising from interactions between reporting requirements be reduced? What successful examples of this are there in Australia or abroad?

What barriers are there to regulators sharing data to facilitate a 'tell us once' approach? For example, legal or information technology barriers.

Would common reporting platforms or data standards reduce reporting burdens? If so, what are the barriers to greater adoption of these?

Are existing instruments of regulatory policy – such as impact analysis requirements and the Regulatory Policy, Practice & Performance Framework – effective at preventing negative interactions between reporting requirements from emerging? How could they be improved?

Recommendation 3: All new reporting requirements should be subject to a mandatory cumulative reporting burden assessment.

Vocus supports the ATA's proposal that all new and amended non-financial reporting obligations be subject to a mandatory cumulative reporting burden assessment. At a minimum, the assessment should:

- **Map existing obligations** by identifying related reporting requirements, definitions, reporting periods and submission channels.
- **Measure the full cost of compliance**, including transition costs, systems development, data collection and retention processes, governance, assurance, privacy and cyber security controls, workforce impacts and opportunity costs.
- **Test proportionality** by assessing the impact on providers of different sizes and operating models.

¹⁴ Australian Communications and Media Authority, Proposal to make the Telecommunications (Consumer Protections Industry Standard) (29 September 2026) <https://www.acma.gov.au/consultations/2026-09/proposal-make-telecommunications-consumer-protections-industry-standard?utm_medium=email&utm_campaign=Have%20your%20say%20on%20stronger%20protections%20for%20telco%20consumers&utm_content=Have%20your%20say%20on%20stronger%20protections%20for%20telco%20consumers+CID_4cfd86b3f18e86c8f16a95640fdebc75&utm_source=SendEmailCampaigns&utm_term=ACMA%20website>.

- **Assess alternatives** by considering whether existing datasets could be leveraged, whether information is already reported elsewhere, and whether less burdensome approaches could achieve the same regulatory objective.

This type of assessment is particularly important for significant new reporting instruments, such as the proposed Retail RKR. Vocus has concerns regarding the volume and granularity of information proposed to be collected, retained and reported under the draft framework, and will provide this feedback directly to the ACCC.

Without cumulative burden assessments, there is a risk that reporting requirements continue to expand without sufficient consideration of implementation costs, existing regulatory obligations or evidence that the information collected will materially improve regulatory outcomes.

Recommendation 4: Sunset reporting requirements introduced to validate the effectiveness of new regulatory schemes unless an ongoing need can be demonstrated.

In some circumstances, it is appropriate to introduce reporting requirements to assess the effectiveness of a new or bespoke regulatory framework. For example, the *Telecommunications (SMS Sender ID Register) Industry Standard 2025* establishes a new mechanism for verifying SMS Sender IDs. To support implementation of the scheme, participating telecommunications providers are required to submit quarterly reports to the ACMA within 20 business days of the end of each reporting period.

The ACMA's draft reporting template requires providers to collect and report a range of operational metrics, including:

- Total number of messages sent using Sender IDs registered on the SMS Sender ID Register.
- Total number of messages sent using unregistered Sender IDs.
- Total number of Sender ID messages received by the provider.
- Total number of messages containing unregistered Sender IDs that were disrupted by the provider.

Vocus recognises the value of this reporting during the initial implementation of the scheme. It provides regulators with visibility of industry adoption, helps identify compliance issues and allows the effectiveness of the framework to be assessed against its policy objectives.

However, reporting requirements introduced to validate a new regulatory model should not automatically become permanent. Once a regulator is satisfied that a scheme is operating as intended, the ongoing need for detailed reporting should be reassessed. In many cases, a review after one to two years would provide sufficient evidence to determine whether reporting should be retained, reduced or removed altogether.