

TCO Review

1 April to 30 June 2024

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Tolling Customer Ombudsman

PROCESS REFINEMENT PUT INTO PLACE

The jurisdiction of the TCO in respect to disputes between Linkt and toll road users is only enlivened if a claimant has been through the internal Transurban Customer Resolution Process.

Over the last few years there has been an increasing trend of potential claimants coming directly to the TCO before going through the Transurban Customer Resolution Process.

Until now, the TCO sought confirmation from claimants both on the phone and in writing in the complaint form that they have gone through the Transurban Customer Resolution Process. The majority of claimants confirmed that they have been through this process when this was not the case.

As a consequence, Transurban and the TCO have implemented refinements to the existing process as follows:

- Each new matter that comes into the TCO is referred to the Transurban Customer Resolution Group for review.
- Transurban will confirm with TCO whether they have previously sought to resolve the dispute or not.
- If Transurban have previously sought to resolve the dispute, then the TCO proceeds with the process of resolving the matter under the TCO Scheme.
- If Transurban have not previously sought to resolve the matter, the claimant is notified by Transurban that they will seek to resolve the matter first before the TCO seeks to resolve the matter if required.
- The TCO has confirmed with Transurban that these matters must be resolved by Transurban as a matter of urgency and within weeks not months as these arrangements could if not done expeditiously cause an increase in the time these disputes are being resolved. Some of these matters in the latter category will come back to the TCO for resolution, However, once again it is especially important here in these cases for Transurban to seek to resolve these claims as a matter of urgency,
- The TCO in discussing these matters with consumers where the consumers have not first gone through the Transurban Customer Resolution process, have indicated to consumers if they do not

consider that this process has been successful within 2 weeks they are able to come back and lodge the claim with the TCO.

These new refinements to the process have had a significant impact on the number of matters which the TCO accepted as new claims in this quarter but did not reduce the potential number of claims coming into the TCO during the quarter.

- For example, after referrals back to the Transurban Customer Relations Scheme the TCO had 27 new claims in the quarter.
- The total new claims for the TCO in April was 11, May was 9 and June was 7.
- The new claims for the TCO for NSW was 4 complaints in April, 3 complaints in May and 2 complaints in June.
- The new claims for the TCO for Queensland was April 5 complaints, May 2 complaints and June 3 complaints.
- The new claims for the TCO for Victoria was April 2 complaints, May 4 complaints and June 2 complaints.
- Total Complaints originally submitted to TCO by complainants was 179 in the quarter.
- Total Complaints originally submitted to TCO by complainants in April was 64.
- Total Complaints originally submitted to TCO by complainants in May was 70.
- Total Complaints originally submitted to TCO by complainants in June was 45.

The TCO will monitor the effectiveness of the refinements to the process to satisfactorily resolve complaints and record how many of the claims that have been referred to the Transurban Customer Resolution Group ultimately comes back for resolution by the TCO.

The TCO will also need to monitor carefully that Transurban deals with the matters expeditiously so that those claims that are referred back to Transurban are dealt with through the whole dispute resolution process in a timely manner.

GENERAL TRENDS

Given the above change in definition figures for previous quarters are not consistent with the general trends.

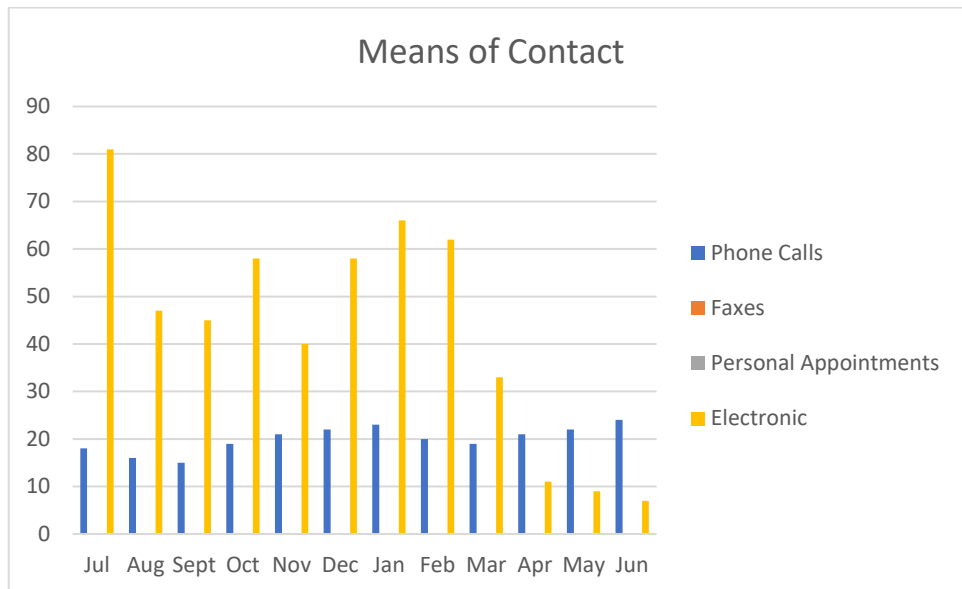
In this quarter the figures establish that all claims in all jurisdictions the figure for each State is similar.

COMPLAINT RESOLUTION

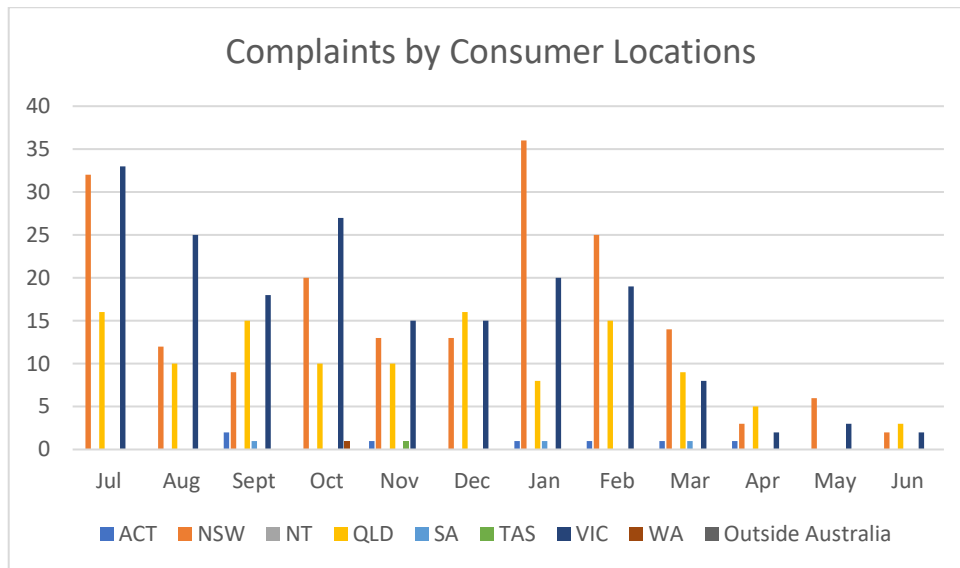
The TCO has a quarterly reporting regime presenting the prior 12 months of statistics on a rolling basis. This report provides data on the last 12 months (building on data already presented), being report 21. The key points relating to this reporting period are:

- The predominant means of contacting the TCO with a complaint continues to be electronically, either through the online complaint form or via email after downloading the complaint form from the website.
- Despite this, the TCO recognises that telephone contact continues to be very important for consumers and calls to the TCO's 1800 number remain steady and come from all jurisdictions. The reason being is that most consumers anxiety levels reduce in respect to disputes if they have spoken to the independent Ombudsman.

- One trend that the TCO observes is that over the last quarter and indeed the last few quarters there were more telephone calls to the TCO than is generally the case. This seems to be a new and continuing trend.
- These calls give the TCO the opportunity to ask consumers:
 - directly whether they have sought to resolve the matter via the Transurban Customer Resolutions team before they contacted the TCO
 - to explain their complaint in their own words
 - for information to identify the ‘hot button’ issues for the consumer in their particular circumstances.
- The TCO recognises that verbal communication is more convenient for some and may allow consumers to better express their position than being asked to reduce their complaint to writing.
- The TCO meets with the Toll Operator every quarter to discuss any common themes that the TCO considers are causing consumers concerns. Current themes include account management issues, the Victorian claim numbers and the activities of debt collectors contracted by the Toll Operator.



- The TCO operates across toll roads in three states in Australia – New South Wales, Queensland and Victoria, but is available for all consumers of those toll roads regardless of the consumer’s location of residence.



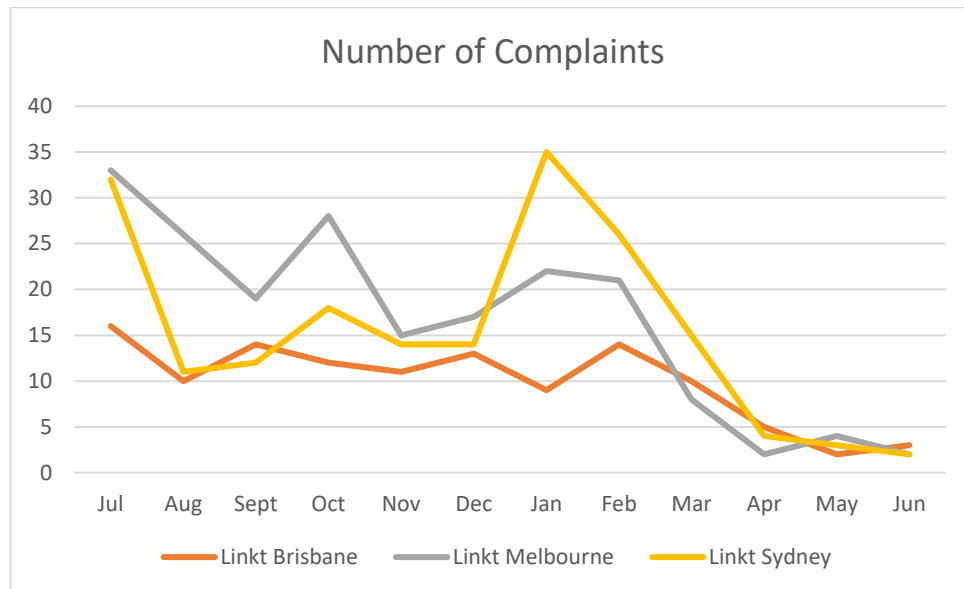
COMPLAINT INFORMATION

The refined process between Transurban and the TCO have had a significant impact on these present figures in each of NSW, Queensland and Victoria on a 12 month basis primarily because of this quarter. Once again, the long-term impact of the new process needs to be reviewed and assessed.

In the most recent 12-month period 517 complaints were received as follows:

- New South Wales consumers traditionally represent about 50% of the TCO workload, however for the reporting period it is substantially less than 50%, i.e. 37% (191 complaints out of 517).
- Queensland consumers generally represent just over 20% of complaints and for the last 12 months it is just over 20%.
- Victoria generally represents approximately 30% of complaints. Despite this, the rate for the last 12 months is significantly higher, having increased to 40%.
 - Initially, it was clear this spike in complaints from Victoria was contributed to by the implementation of a new customer interface system in Victoria.
 - The Toll Operator has made adjustments to the system however, and it seems from the last few quarters that the number of complaints in Victoria are coming down aside from the new arrangements that have been implemented. However, the figures in Victoria are still relatively high so we need to assess on a continuing basis whether those adjustments are having the desired effect.
 - The TCO will continue to monitor carefully the claim figures in Victoria.

In the Ombudsman's view, after the issues in Victoria are rectified, we should see each states claim's reverting to their historical percentage of total claims.



Overall, some longer-term trends can be identified:

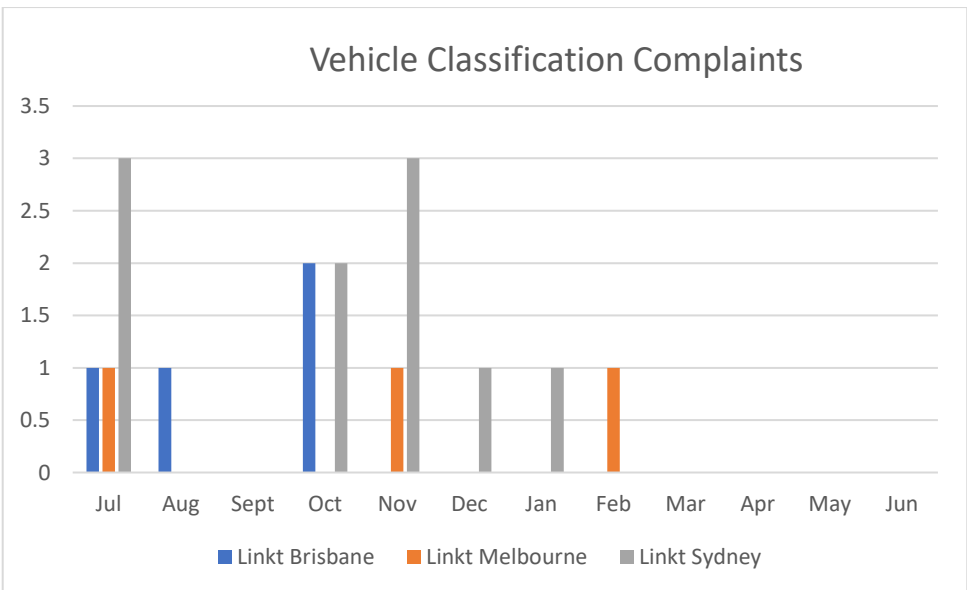
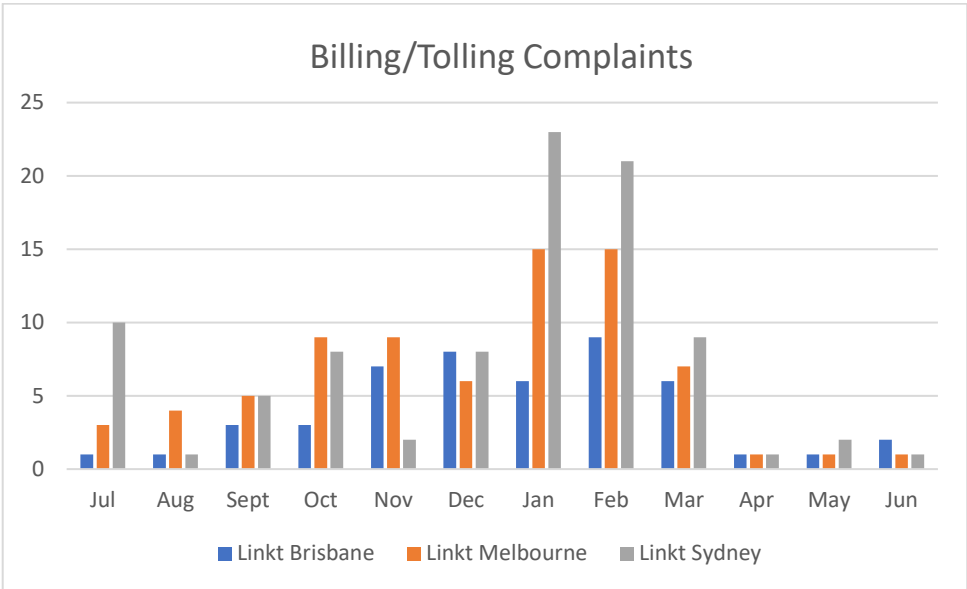
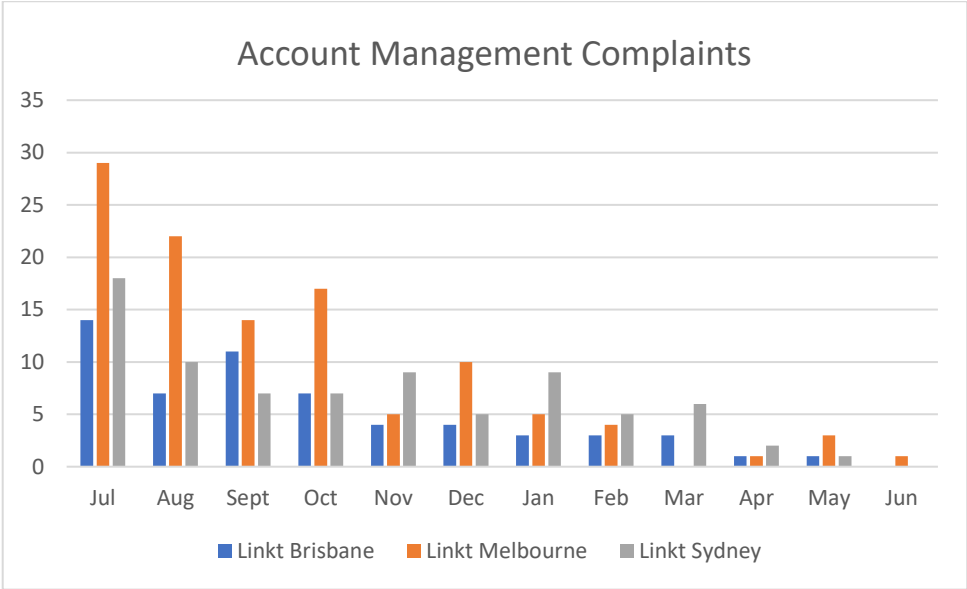
The TCO notes the Toll Operator's increased focus on its customer experience and internal dispute resolution process. This should enable complaints to be resolved quicker and without the need for referral to the TCO. This should reduce the number of complaints received and so over the long term the TCO expects complaint numbers to drop in all states. However, at this stage, the resolution of complaints is still taking a considerable amount of time and therefore additional measures may need to be taken by Transurban to resolve these issues in a timely fashion.

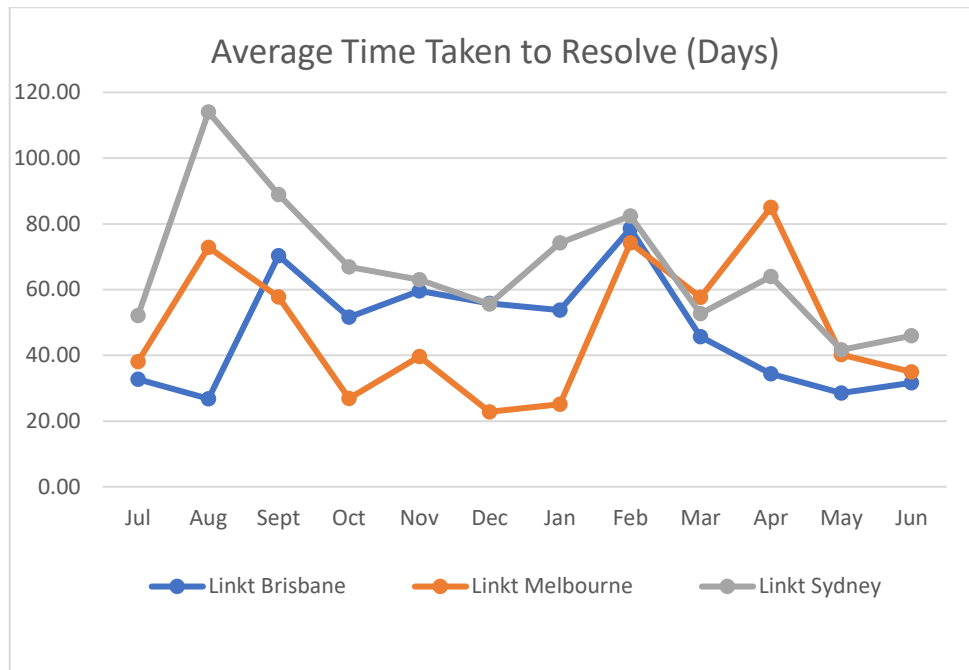
- The Toll Operator has also now been operating its current approach to Financial Hardship for some time and anecdotally the results have been encouraging – demonstrated by a downturn in the number of financial hardship complaints which are referred to the TCO.

A preliminary assessment (yet to be verified definitively and the need to monitor the impact of the new arrangements over a longer period) is that total per annum claim may not for the foreseeable future reach the 1000 claims.

- The nature of the complaints remains essentially the same. The main issues in the last year relate to Accounts Management and Billing/Tolling.
 - This is most often the application of administrative fees or infringement fines and whether these have been properly incurred.
 - There does seem to be a steady increase in the number of Account Management complaints since early to mid-year 2022 in the context of overall complaints.
 - In Victoria in the previous three quarters, there seems to be a significant increase in Account Management complaints.

The TCO will continue to monitor developments in this area.



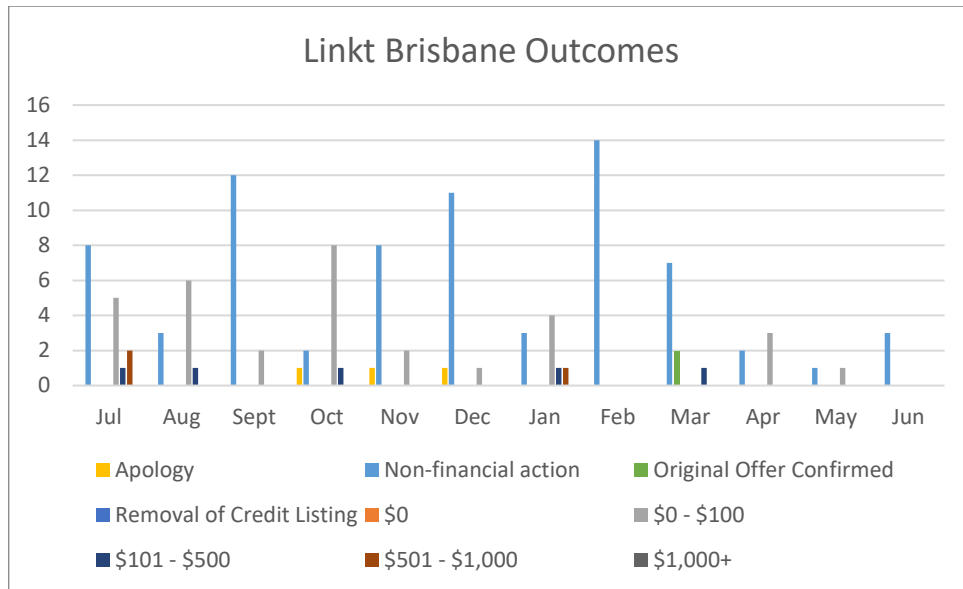


The time taken for the Toll Operator to resolve complaints has been increasing in the last quarter and in particular in April.

- In the four most recent quarters, generally there has been a significant increase in the periods of time taken to resolve disputes.
 - This includes the amount of time for the Toll Operator to acknowledge and respond to consumers at the first instance, as well as the time taken to properly identify and investigate the issues raised before providing an outcome for the consumer to consider.
 - It is also taking significantly longer than in the recent past for the Toll Operator to respond to claims that have been referred to them through the TCO System.
 - Over the last quarter, the timeframes seem to be coming down slightly.
- Prior to COVID (in late 2019) complaints generally may have taken 31-60 days to resolve if a protracted dispute arose.
- In the most recent quarter:
 - QLD saw an improvement in timeliness in this quarter from the February and March figures.
 - NSW and VIC both had increases in the time taken to resolve in April, but these have improved in May and June.
 - There was a significant spike in Victoria during April and a reduction in the following 2 months
- Over the 12-month reporting period however, there has been no real significant reduction in the 31-60 and 90 day categories – accordingly there still needs to be an improved focus on the overall issue of timeliness of complaint handling. The TCO notes also that in the last quarter the 90 day category has increased. The issue of timeliness therefore still needs some work.
- The TCO at his quarterly meetings with Transurban, raised this issue as one that needed to be monitored and addressed. Transurban has indicated to the TCO that they have put more staff on to seek to reduce the time delays in responding to complaints. At the moment, we have not seen the impact of the extra staff on the issue of timeliness of complaint resolution.

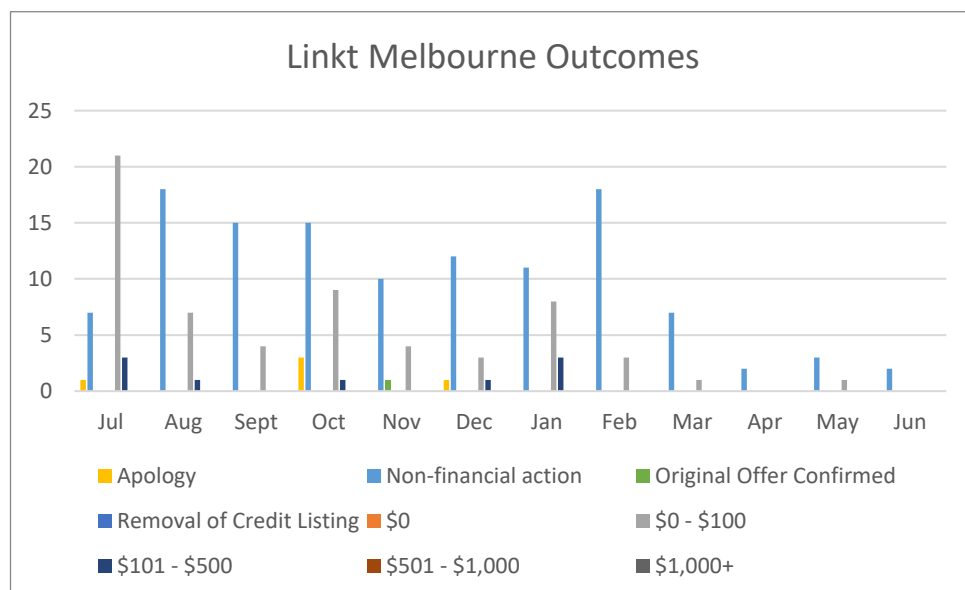
A couple of observations are as follows:

- Where a resolution is achieved, generally the outcome can range from non-financial actions to an acceptance of an original offer to resolve, or a financial benefit from waiver of an amount of debt or a payment.
- Significant debt levels arise usually through the imposition of fines by state authorities. These matters are outside of the TCO's jurisdiction as they are not amounts which are issued by, or payable to, the toll operators.



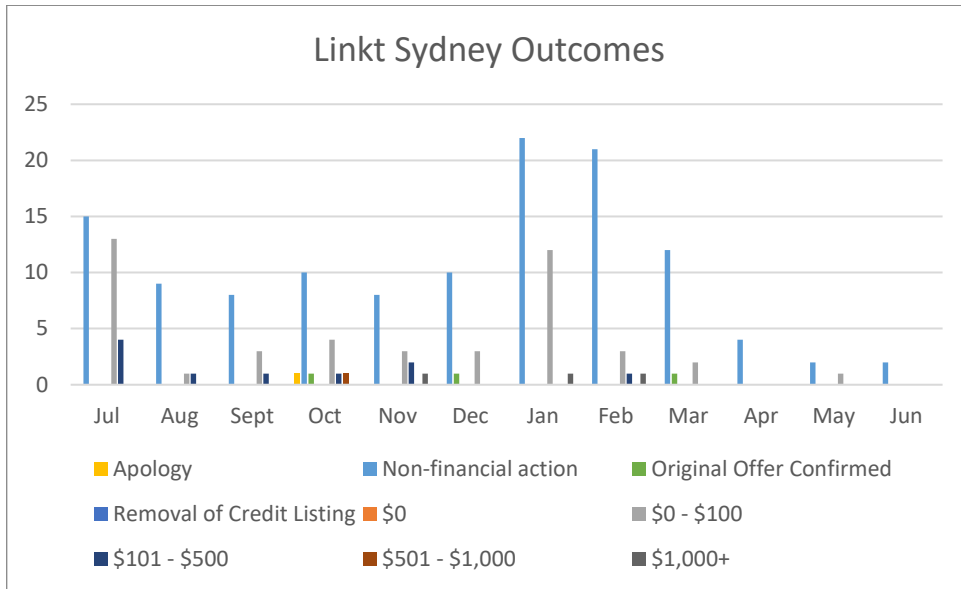
Subject to the refined process and confirmation of the longer term impact of these arrangements the complaint demographics for QLD (resolved by Linkt Brisbane) remain generally steady:

- The number of complaints has been stable for the last several quarters.
- The outcomes for disputes continue to be broadly consistent for the 12-month period.



Subject to the refined process and confirmation of the longer term impact of these arrangements the complaint demographics for VIC (resolved by Linkt Melbourne):

- have seen a significant increase overall in complaint numbers over the previous three quarters.
- the financial redress outcomes have seen a corresponding increase in their use over this time but have started to return to normal over the few quarters.



Subject to the refined process and confirmation of the longer term impact of these arrangements the complaint demographics for NSW (resolved by Linkt Sydney):

- generally, over the previous three quarters show a decrease in the number of complaints compared to historical numbers.
- indicate outcomes in NSW are generally ‘non-financial actions’ which include explanations, record keeping adjustments and the provision of information, rather than the payment of any monies or waiver of any debts.

SYSTEMIC THEMES AND ISSUES

Systemic issues are those issues or concerns which, by their nature, may affect more people than the person making the complaint which identifies the issue. The TCO has an obligation to identify, and take steps to try to resolve, systemic issues where we become aware of them.

The systemic issue currently being worked on is:

- Consumer contact:
 - Consumers report confusion about the Toll Operator being unable to contact them and the first time they are made aware of an issue is after the matter has been referred to debt collectors or the authorities. The Toll Operator has indicated in recent discussions with the TCO that the issues in respect of debt collectors are being focussed.
 - The consequence is that tolls and default notices are issued for debts which have been incurred over a significant period of time before the complaint is raised.
 - The Toll Operator says:

- frequently multiple attempts are made through a variety of media (email, post, telephone, SMS) to contact but were unsuccessful or that consumers sought to ignore the contact.
- sometimes an unsuccessful contact situation is attributed to a failure to update contact details with the relevant licencing authorities.

Whilst we understand the difficulties in these areas, the Toll Operator does need in the medium and longer term to resolve these issues as they are causing significant consumer concern.

- The new Linkt App for consumers implemented by the Toll Operator seems to be assisting in greater up to date accuracy of records and therefore making it more effective in the Toll Operator reaching customers if and when required.
- However, outdated contact information continues to be raised as a problem and could explain the lack of success in reaching relevant consumers. However:
 - It appears that once debt collectors are engaged, the collection agency is quickly able to locate the consumer and make contact.
 - This implies that the consumer can be reached through the application of different approaches.
- Transurban as part of its continuous improvement project are looking at ways to seek to deal more effectively with these issues, they acknowledge that this is an ongoing and important issue for consumers.
- Once a debt collection agency is involved in dealing with consumers, the anxiety level of the consumer rises considerably.
- The TCO believes the Toll Operator should take reasonable steps to ensure that they actively manage the debt collectors to make sure they are dealing with consumers appropriately – including by acting in accordance with the Toll Operator’s financial hardship mechanisms and policies.
- Again, whilst we understand the difficulties in these areas, the Toll Operator does need in the medium and longer term to resolve these issues as these issues are continuing to result in significant consumer concern.
- In the quarterly meetings with the Toll Operator, the TCO continues to raise these issues with the Toll Operator as a consumer concern.

APPENDIX 1: RAW DATA 2023/2024

TCO Contact Types	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	
Phone Calls	18	16	15	19	21	22	23	20	19	21	22	24	
Faxes	0	0	0	0	0	0	0	0	0	0	0	0	
Personal Appointments	0	0	0	0	0	0	0	0	0	0	0	0	
Electronic	81	47	45	58	40	58	66	62	33	11	9	7	
TOTAL	99	63	60	77	61	80	89	82	52	32	31	31	
TCO Consumer Locations	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	
ACT	0	0	2	0	1	0	1	1	1	1	0	0	7
NSW	32	12	9	20	13	13	36	25	14	3	6	2	185
NT	0	0	0	0	0	0	0	0	0	0	0	0	0
QLD	16	10	15	10	10	16	8	15	9	5	0	3	117
SA	0	0	1	0	0	0	1	0	1	0	0	0	3
TAS	0	0	0	0	1	0	0	0	0	0	0	0	1
VIC	33	25	18	27	15	15	20	19	8	2	3	2	187
WA	0	0	0	1	0	0	0	0	0	0	0	0	1
Outside Australia	0	0	0	0	0	0	0	0	0	0	0	0	0
Complaint Numbers	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	
Linkt Brisbane	16	10	14	12	11	13	9	14	10	5	2	3	119
Linkt Melbourne	33	26	19	28	15	17	22	21	8	2	4	2	197
Linkt Sydney	32	11	12	18	14	14	35	26	15	4	3	2	186
TOTAL	81	47	45	58	40	44	0	0	0	11	9	7	342
Time Taken to Resolve	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	
0-7 days	14	4	3	16	4	8	9	4	2	1	2	0	67
8-14 days	7	5	4	5	2	2	8	1	2	1	1	0	38
15-30 days	20	8	11	5	8	7	11	7	3	1	1	2	84
31-60 days	25	11	6	12	10	6	13	2	10	3	2	5	105
61-90 days	5	0	1	12	6	21	3	13	16	2	3	0	82
90+ days	10	19	20	8	10	0	22	34	0	3	0	0	126
TOTAL	81	47	45	58	40	44	66	61	33	11	9	7	502
Linkt Brisbane Outcomes	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	
Apology	0	0	0	1	1	1	0	0	0	0	0	0	3
Non-financial action	8	3	12	2	8	11	3	14	7	2	1	3	74
Original Offer Confirmed	0	0	0	0	0	0	0	0	2	0	0	0	2
Removal of Credit Listing	0	0	0	0	0	0	0	0	0	0	0	0	0
\$0	0	0	0	0	0	0	0	0	0	0	0	0	0
\$0 - \$100	5	6	2	8	2	1	4	0	0	3	1	0	32
\$101 - \$500	1	1	0	1	0	0	1	0	1	0	0	0	5
\$501 - \$1,000	2	0	0	0	0	0	1	0	0	0	0	0	3
\$1,000+	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	16	10	14	12	11	13	9	14	10	5	2	3	119
Linkt Melbourne Outcomes	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	
Apology	1	0	0	3	0	1	0	0	0	0	0	0	5
Non-financial action	7	18	15	15	10	12	11	18	7	2	3	2	120
Original Offer Confirmed	0	0	0	0	1	0	0	0	0	0	0	0	1

Removal of Credit Listing	0	0	0	0	0	0	0	0	0	0	0	0	0
\$0	0	0	0	0	0	0	0	0	0	0	0	0	0
\$0 - \$100	21	7	4	9	4	3	8	3	1	0	1	0	61
\$101 - \$500	3	1	0	1	0	1	3	0	0	0	0	0	9
\$501 - \$1,000	0	0	0	0	0	0	0	0	0	0	0	0	0
\$1,000+	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	32	26	19	28	15	17	22	21	8	2	4	2	196
													0
Linkt Sydney Outcomes	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	0
Apology	0	0	0	1	0	0	0	0	0	0	0	0	1
Non-financial action	15	9	8	10	8	10	22	21	12	4	2	2	123
Original Offer Confirmed	0	0	0	1	0	1	0	0	1	0	0	0	3
Removal of Credit Listing	0	0	0	0	0	0	0	0	0	0	0	0	0
\$0	0	0	0	0	0	0	0	0	0	0	0	0	0
\$0 - \$100	13	1	3	4	3	3	12	3	2	0	1	0	45
\$101 - \$500	4	1	1	1	2	0	0	1	0	0	0	0	10
\$501 - \$1,000	0	0	0	1	0	0	0	0	0	0	0	0	1
\$1,000+	0	0	0	0	1	0	1	1	0	0	0	0	3
TOTAL	32	11	12	18	14	14	35	26	15	4	3	2	186
													0
Account Management Complaints	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	0
Linkt Brisbane	14	7	11	7	4	4	3	3	3	1	1	0	58
Linkt Melbourne	29	22	14	17	5	10	5	4	0	1	3	1	111
Linkt Sydney	18	10	7	7	9	5	9	5	6	2	1	0	79
TOTAL	61	39	32	31	18	19	17	12	9	4	5	1	248
													0
Billing / Tolling Complaints	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	0
Linkt Brisbane	1	1	3	3	7	8	6	9	6	1	1	2	48
Linkt Melbourne	3	4	5	9	9	6	15	15	7	1	1	1	76
Linkt Sydney	10	1	5	8	2	8	23	21	9	1	2	1	91
TOTAL	14	6	13	20	18	22	44	45	22	3	4	4	215
													0
Vehicle Classification Complaints	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	0
Linkt Brisbane	1	1	0	2	0	0	0	0	0	0	0	0	4
Linkt Melbourne	1	0	0	0	1	0	0	1	0	0	0	0	3
Linkt Sydney	3	0	0	2	3	1	1	0	0	0	0	0	10
TOTAL	5	1	0	4	4	1	1	1	0	0	0	0	17
													0
Infrastructure / Signage Traffic Management Complaints	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	0
Linkt Brisbane	0	1	0	0	0	0	0	0	0	0	0	1	2
Linkt Melbourne	0	0	0	1	0	0	0	0	0	0	0	0	1
Linkt Sydney	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	0	1	0	1	0	0	0	0	0	0	0	1	3
													0
Average Time To Resolve	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	0
Linkt Brisbane	32.69	26.80	70.36	51.58	59.64	55.85	53.78	78.57	45.70	34.40	28.50	31.67	569.5264
Linkt Melbourne	38.03	72.85	57.74	26.86	39.60	22.82	25.09	74.24	57.63	85.00	40.25	35.00	575.098
Linkt Sydney	52.06	114.00	88.92	66.89	63.00	55.57	74.23	82.42	52.73	64.00	41.67	46.00	801.4911