

TCO Review

1 July to 30 September 2024

Phillip Davies

Tolling Customer Ombudsman

PROCESS REFINEMENT CONTINUING

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. This trend continues in this quarter.

Until the last quarter, the TCO generally 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 before lodging a complaint form with the TCO. Previously, the majority of claimants advised that they have been through this process when this was not the case.

The TCO continues to support the refinements to the existing process which are as follows:

- Each new matter that comes into the TCO is referred to the Transurban Customer Resolution Group for review.
- Transurban will advise the 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. That is, within weeks not months as these arrangements could if not done expeditiously cause an increase in the time these disputes are being resolved by the TCO. The TCO has indicated to Transurban that subject to exceptional circumstances he would expect this to be done within a 2-week period. 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.

- Where the consumers have not first gone through the Transurban Customer Resolution process, the TCO tells consumers to first contact Linkt and, if they do not consider that this process has been successful within 2 weeks, to come back and lodge the claim with the TCO.

These new refinements to the process continue to significantly reduce 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 17 new claims in the quarter as opposed to 27 last quarter.
- The total new claims for the TCO in July was 7, August was 5 and September was 5.
- The new claims for the TCO for NSW was 2 complaints in July, 1 complaint in August and 2 complaints in September.
- The new claims for the TCO for Queensland was 2 complaints in July, 1 complaint in August and 1 complaint in September.
- The new claims for the TCO for Victoria was July 3 complaints, August 3 complaints and September 0 complaints.
- Total Complaints originally submitted to TCO by complainants was 149 in the quarter as opposed to 179 last quarter.
- Total Complaints originally submitted to TCO by complainants in July was 47.
- Total Complaints originally submitted to TCO by complainants in August was 51.
- Total Complaints originally submitted to TCO by complainants in September was 51.
- Accordingly, Transurban requested to resolve directly: 40 complaints in July, 46 complaints in August and 46 complaints in September.

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 carefully monitor that Transurban deals with the matters expeditiously so that those claims that are referred back to Transurban are dealt with in a timely manner. The TCO in its quarterly discussions with Transurban will raise this issue as some consumers have expressed frustration as to the total time taken to resolve matters under the new process

GENERAL TRENDS

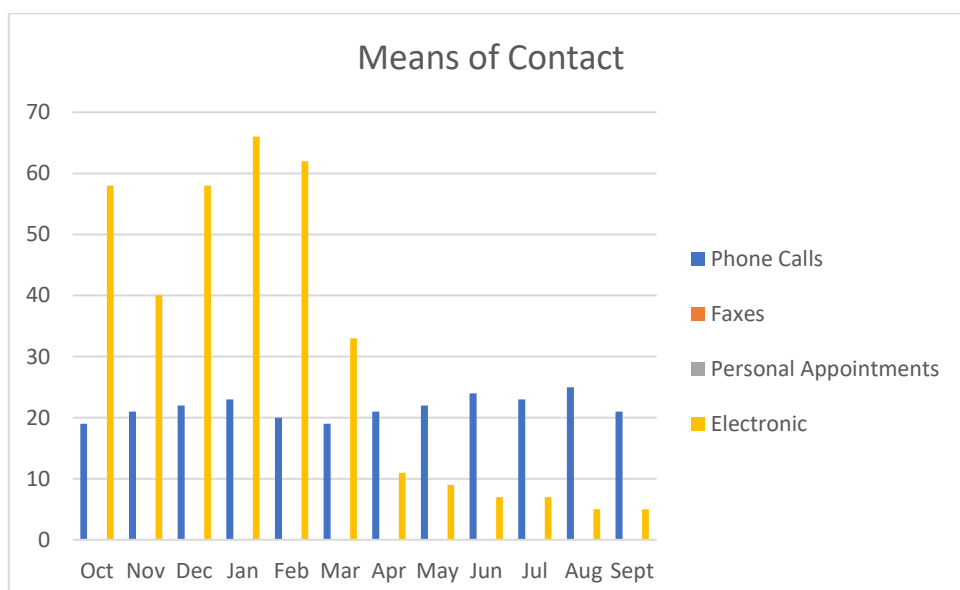
Given the above change in definition, the total figures of claims for previous quarters (apart from the last one) are not consistent with the figures historically.

In this quarter, the figures establish that Qld has less claims than both NSW and Victoria and that NSW has more claims than Victoria although the sample size is small. The figures indicate that the spike in complaints in Victoria as a result of the new account management system has ended.

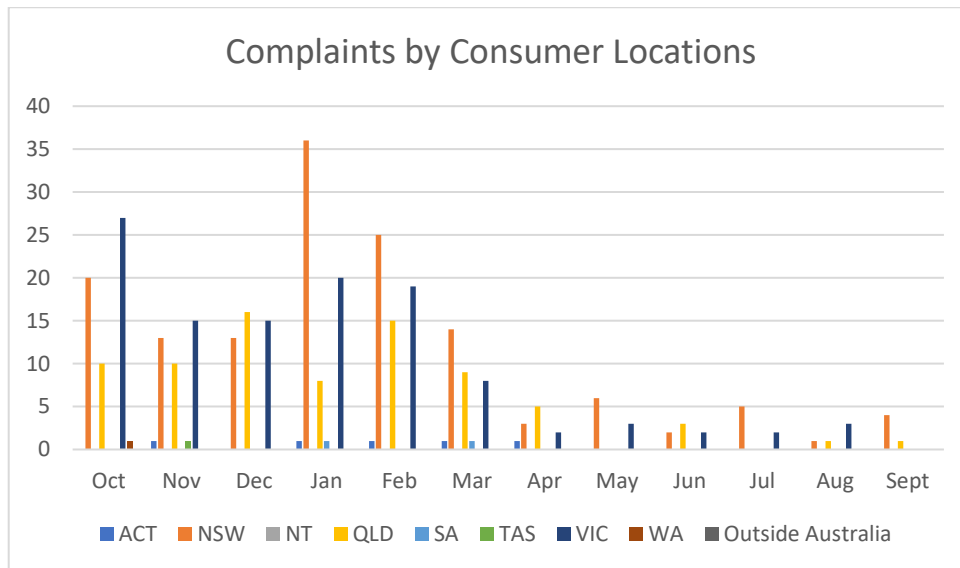
COMPLAINT RESOLUTION

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 22. 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 several 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
 - for consumers to explain their complaint in their own words
 - for consumers to provide 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 NSW tolling issues generally and the activities of debt collectors contracted by Transurban.



- 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.



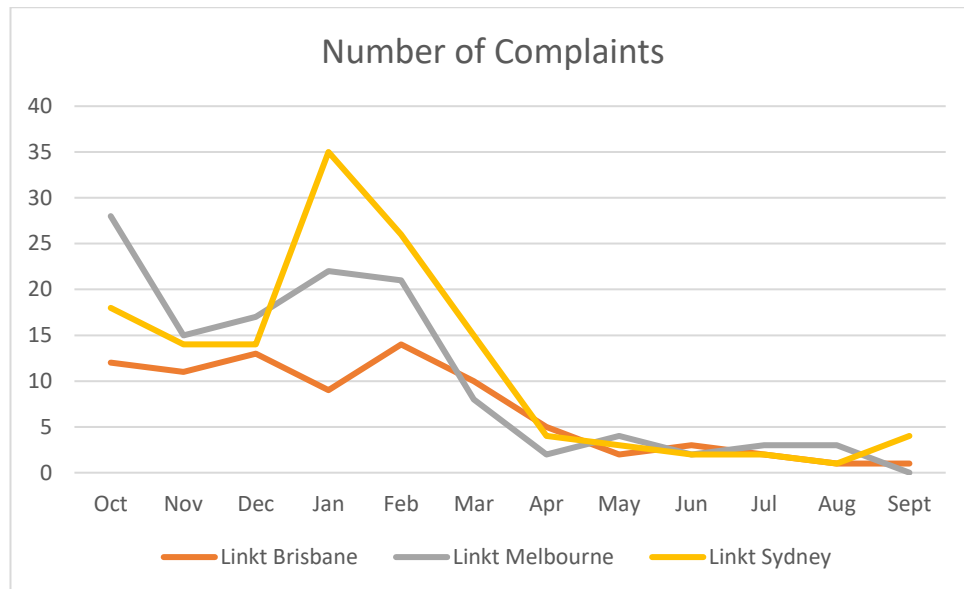
COMPLAINT INFORMATION

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 the last 2 quarters. Once again, the long-term impact of the new process needs to be reviewed and assessed.

In the most recent 12-month period 356 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. 40% (143 complaints out of 356).
- Queensland consumers generally represent just over 20% of complaints and for the last 12 months it is just over 23%.
- Victoria generally represents approximately 30% of complaints. Despite this, the rate for the last 12 months is significantly higher, having increased to 38%.
 - Initially, it was clear this spike in complaints from Victoria was contributed to by the implementation of a new customer interface system in Victoria.
 - Transurban 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 in the last 12 months 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, as the issues in Victoria have been largely rectified, we can see each states claim's reverting to their historical percentage of total claims.



Overall, some longer-term trends can be identified:

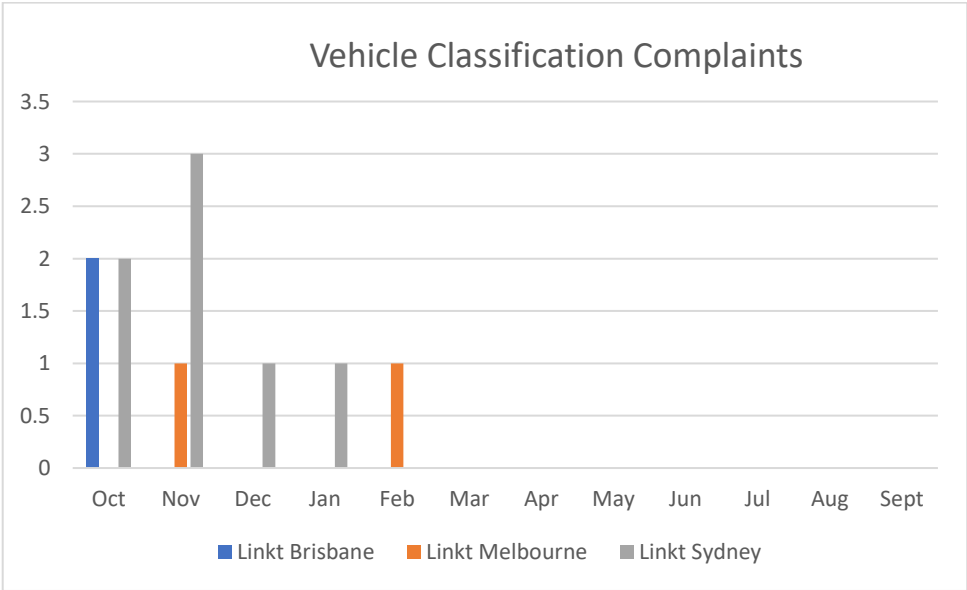
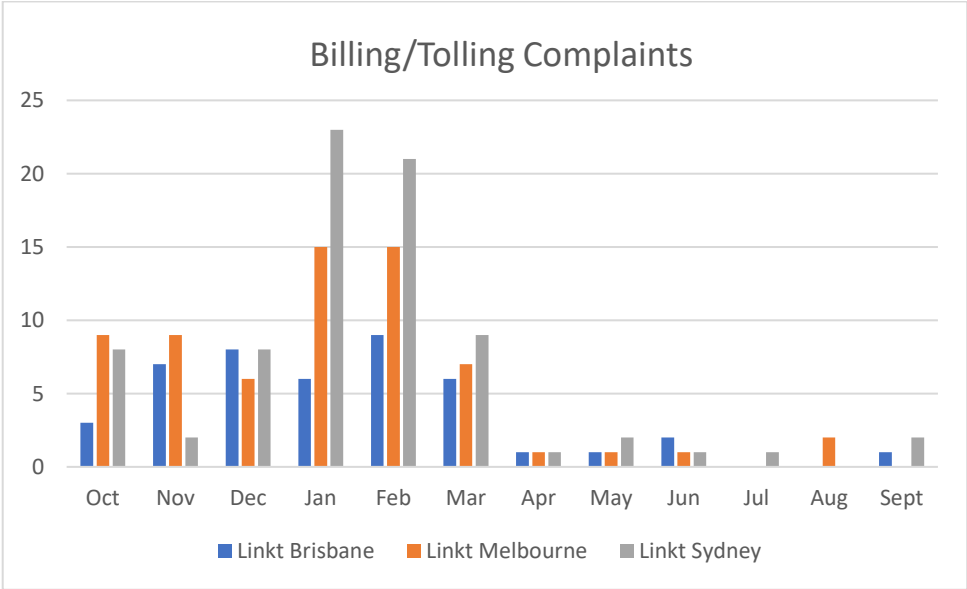
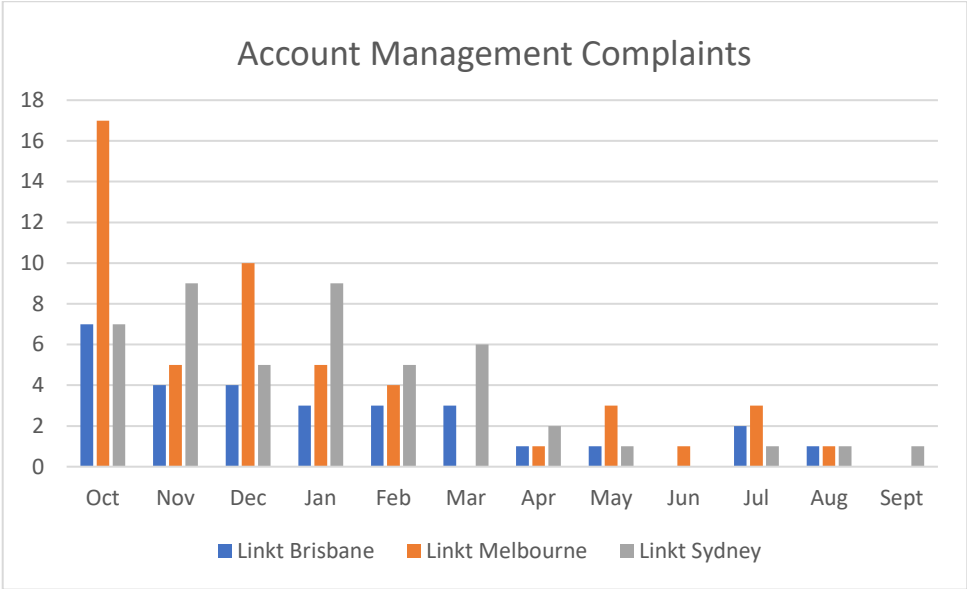
The TCO notes the Toll Operator's increased focus on its customer experience and internal dispute resolution process. This should enable complaints to be resolved quicker and without the need for referral to the TCO. This should reduce the number of complaints received and so over the long term the TCO 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.

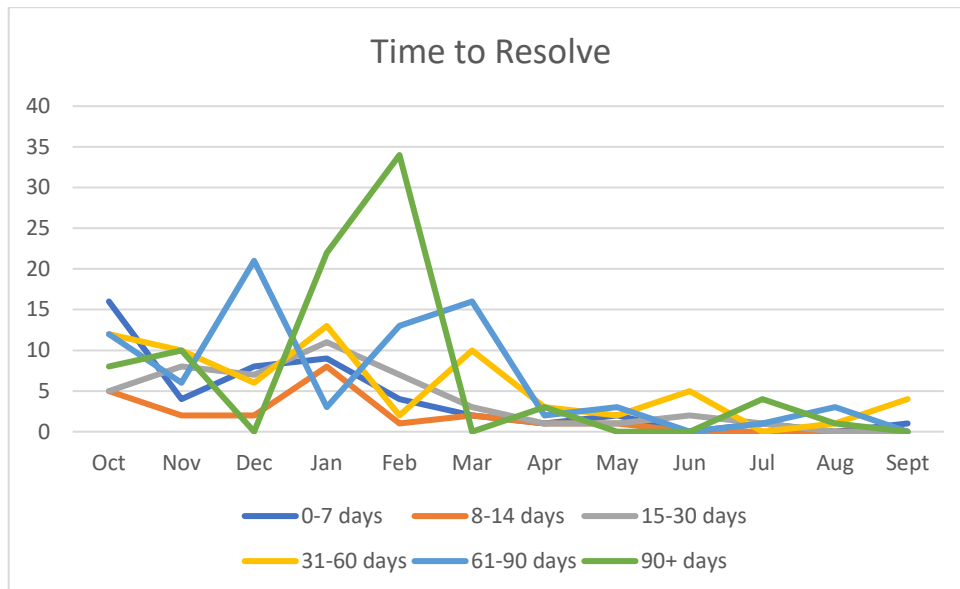
A preliminary assessment (yet to be verified definitively and the need to monitor the impact of the new arrangements over a longer period) is that total per annum claim may not for the foreseeable future reach the 1000 claims.

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.
- In Victoria in the earlier quarters of this year before the last 2 quarters, there seemed to be a significant increase in Account Management complaints.

The TCO will continue to monitor developments in this area.



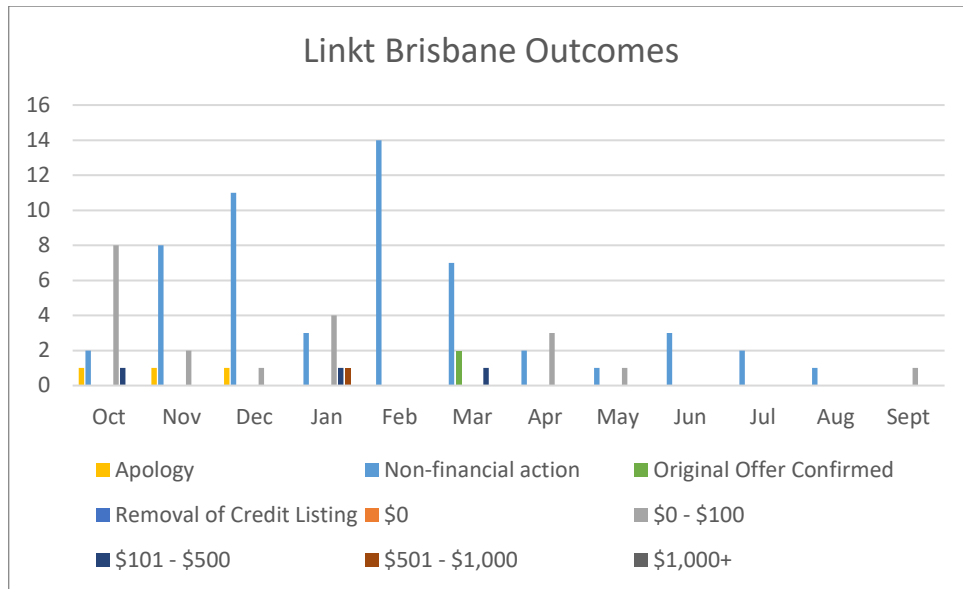


The time taken for the Toll Operator to resolve complaints is still taking longer than it should but has been decreased since the December to March period.

- In the last two recent quarters, generally there has been a slight decrease in the periods of time taken to resolve disputes. This decrease involves:
 - 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.
 - The time the Toll Operator 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.
- 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 decreases in the time taken to resolve in the last quarter and an improvement since the December to March period.
 - There was a significant spike in Victoria a few quarters ago but there has been a reduction in the following 2 quarters.
- Over the 12-month reporting period and subject to the new arrangements small sample size there has been at reduction in the 31-60 and 90 day categories. The issue of timeliness still needs to be monitored by the TCO.
- However, given the new arrangements it will be important in the future for the TCO to look at the time to resolve data as a percentage of the number of complaints received.
- 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 seen the preliminary impact of the extra staff on the issue of timeliness of complaint resolution.

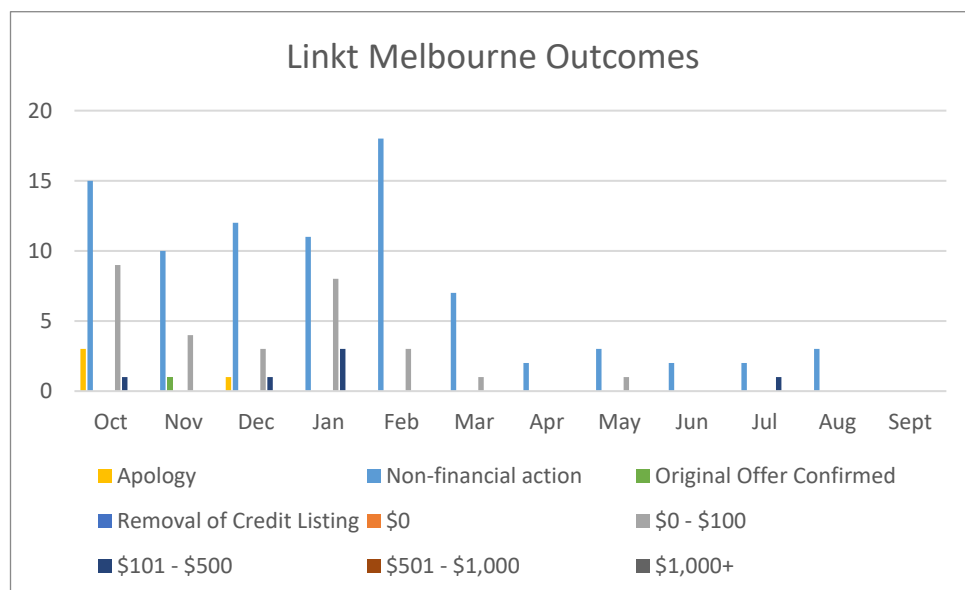
A couple of observations are as follows:

- 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.



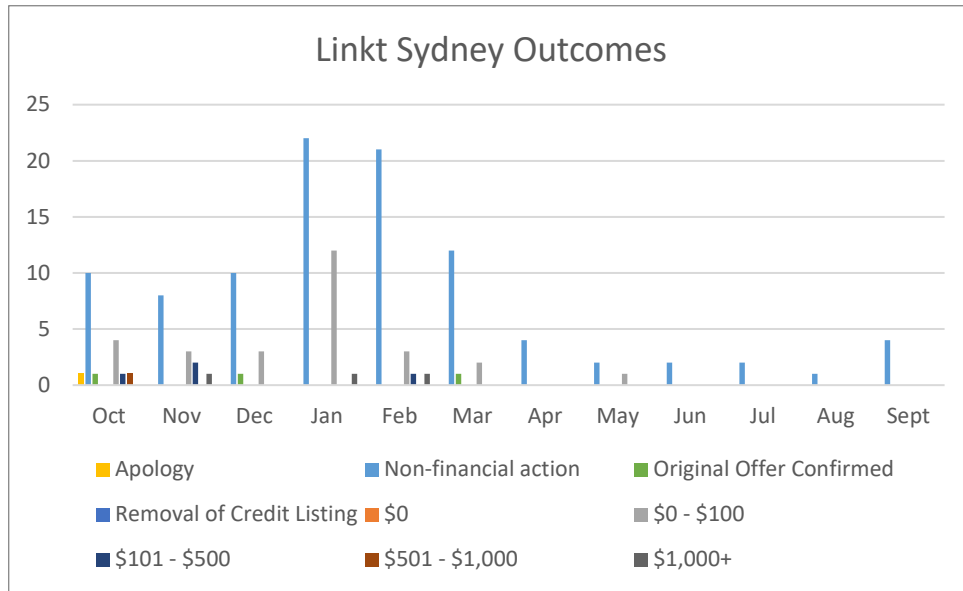
Subject to the refined process and confirmation of the longer-term impact of these arrangements the complaint demographics for QLD (resolved by Linkt Brisbane) remain generally steady:

- The number of complaints has been stable for the last two 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 decrease overall in complaint numbers for the last 2 quarters suggesting that the issues in Victoria have been resolved.
- 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 Transurban 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. Transurban has indicated in recent discussions with the TCO that the issues in respect of debt collectors are being focussed on.
 - 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.

- 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, Transurban 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 Transurban 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 Transurban 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 Transurban’s financial hardship mechanisms and policies.
 - The TCO will continue to refer to this matter, if it is relevant, in particular determinations and will continue to reference this issue in both the Quarterly Reports and Annual Reports
- 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	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
Phone Calls	19	21	22	23	20	19	21	22	24	23	25	21	
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	58	40	58	66	62	33	11	9	7	7	5	5	
TOTAL	77	61	80	89	82	52	32	31	31	30	30	26	
TCO Consumer Locations	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
ACT	0	1	0	1	1	1	1	0	0	0	0	0	5
NSW	20	13	13	36	25	14	3	6	2	5	1	4	142
NT	0	0	0	0	0	0	0	0	0	0	0	0	0
QLD	10	10	16	8	15	9	5	0	3	0	1	1	78
SA	0	0	0	1	0	1	0	0	0	0	0	0	2
TAS	0	1	0	0	0	0	0	0	0	0	0	0	1
VIC	27	15	15	20	19	8	2	3	2	2	3	0	116
WA	1	0	0	0	0	0	0	0	0	0	0	0	1
Outside Australia	0	0	0	0	0	0	0	0	0	0	0	0	0
													0
Complaint Numbers	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
Linkt Brisbane	12	11	13	9	14	10	5	2	3	2	1	1	83
Linkt Melbourne	28	15	17	22	21	8	2	4	2	3	3	0	125
Linkt Sydney	18	14	14	35	26	15	4	3	2	2	1	4	138
TOTAL	58	40	44	0	0	0	11	9	7	7	5	5	186
													0
Time Taken to Resolve	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
0-7 days	16	4	8	9	4	2	1	2	0	1	0	1	48
8-14 days	5	2	2	8	1	2	1	1	0	0	0	0	22
15-30 days	5	8	7	11	7	3	1	1	2	1	0	0	46
31-60 days	12	10	6	13	2	10	3	2	5	0	1	4	68
61-90 days	12	6	21	3	13	16	2	3	0	1	3	0	80
90+ days	8	10	0	22	34	0	3	0	0	4	1	0	82
TOTAL	58	40	44	66	61	33	11	9	7	7	5	5	346
													0
Linkt Brisbane Outcomes	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
Apology	1	1	1	0	0	0	0	0	0	0	0	0	3
Non-financial action	2	8	11	3	14	7	2	1	3	2	1	0	54
Original Offer Confirmed	0	0	0	0	0	2	0	0	0	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	8	2	1	4	0	0	3	1	0	0	0	1	20
\$101 - \$500	1	0	0	1	0	1	0	0	0	0	0	0	3
\$501 - \$1,000	0	0	0	1	0	0	0	0	0	0	0	0	1
\$1,000+	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	12	11	13	9	14	10	5	2	3	2	1	1	83
													0

Linkt Melbourne Outcomes	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	0
Apology	3	0	1	0	0	0	0	0	0	0	0	0	4
Non-financial action	15	10	12	11	18	7	2	3	2	2	3	0	85
Original Offer Confirmed	0	1	0	0	0	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	9	4	3	8	3	1	0	1	0	0	0	0	29
\$101 - \$500	1	0	1	3	0	0	0	0	0	1	0	0	6
\$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	28	15	17	22	21	8	2	4	2	3	3	0	125
													0
Linkt Sydney Outcomes	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	0
Apology	1	0	0	0	0	0	0	0	0	0	0	0	1
Non-financial action	10	8	10	22	21	12	4	2	2	2	1	4	98
Original Offer Confirmed	1	0	1	0	0	1	0	0	0	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	4	3	3	12	3	2	0	1	0	0	0	0	28
\$101 - \$500	1	2	0	0	1	0	0	0	0	0	0	0	4
\$501 - \$1,000	1	0	0	0	0	0	0	0	0	0	0	0	1
\$1,000+	0	1	0	1	1	0	0	0	0	0	0	0	3
TOTAL	18	14	14	35	26	15	4	3	2	2	1	4	138
													0
Account Management Complaints	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	0
Linkt Brisbane	7	4	4	3	3	3	1	1	0	2	1	0	29
Linkt Melbourne	17	5	10	5	4	0	1	3	1	3	1	0	50
Linkt Sydney	7	9	5	9	5	6	2	1	0	1	1	1	47
TOTAL	31	18	19	17	12	9	4	5	1	6	3	1	126
													0
Billing / Tolling Complaints	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	0
Linkt Brisbane	3	7	8	6	9	6	1	1	2	0	0	1	44
Linkt Melbourne	9	9	6	15	15	7	1	1	1	0	2	0	66
Linkt Sydney	8	2	8	23	21	9	1	2	1	1	0	2	78
TOTAL	20	18	22	44	45	22	3	4	4	1	2	3	188
													0
Vehicle Classification Complaints	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	0
Linkt Brisbane	2	0	0	0	0	0	0	0	0	0	0	0	2
Linkt Melbourne	0	1	0	0	1	0	0	0	0	0	0	0	2
Linkt Sydney	2	3	1	1	0	0	0	0	0	0	0	0	7
TOTAL	4	4	1	1	1	0	0	0	0	0	0	0	11
													0
Infrastructure / Signage Traffic	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	0

**Management
Complaints**

Linkt Brisbane	0	0	0	0	0	0	0	0	1	0	0	0	1
Linkt Melbourne	1	0	0	0	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	1	0	0	0	0	0	0	0	1	0	0	0	2

Average Time To Resolve	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	0
Linkt Brisbane	51.58	59.64	55.85	53.78	78.57	45.70	34.40	28.50	31.67	101.50	142.00	6.00	439.6817
Linkt Melbourne	26.86	39.60	22.82	25.09	74.24	57.63	85.00	40.25	35.00	29.67	72.00	5.82	406.4847
Linkt Sydney	66.89	63.00	55.57	74.23	82.42	52.73	64.00	41.67	46.00	109.50	58.00	46.75	546.512