

TCO Review

1 October to 31 December 2024

Phillip Davies

Tolling Customer Ombudsman

ENHANCEMENT OF COMPLAINT RECORDS

The TCO Terms of Reference make it clear that the jurisdiction of the TCO in respect to disputes between Linkt and toll road users is only enlivened if a claimant has previously been through the internal Transurban Customer Resolution Process and has been unable to achieve a satisfactory resolution.

Since the inception of the TCO scheme, all complaints lodged with the TCO (whether previously handled by Transurban or not) have been recorded and included in our statistics in order to track progress for consumers.

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 and the previous two quarters.

Prior to the last three quarters, 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. The information received from consumers has not always been reliable however.

In order to better reflect the numbers of consumers who have not been able to achieve a satisfactory resolution through the Transurban Customer Resolution Process, and therefore fall properly within the TCO jurisdiction, a new verification step has been added to our intake process. This is that the TCO will verify with Transurban whether it has previously sought to resolve the dispute or not.

Where it has not had the opportunity to do so, 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.

In all other cases, the TCO process remains the same.

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 taken for these disputes to be resolved for consumers.

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.

This refinement to the process continues 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. This has been true also for the previous two quarters.

The specific figures in this quarter establish:

- After referrals back to the Transurban Customer Resolutions Team, the TCO had 14 new claims in the quarter as opposed to 17 last quarter. Some of these new claims were raised initially in previous months but were not able to be resolved directly by Transurban Customer Resolution Team and so were brought into the TCO jurisdiction.
- The total new claims for the TCO in October was 2, November was 9 and December was 3.
- The new claims for the TCO for New South Wales was 1 complaint in October, 3 complaints in November and 1 complaint in December.
- The new claims for the TCO for Queensland was 0 complaints in October, 3 complaints in November and 2 complaints in December.
- The new claims for the TCO for Victoria was October 1 complaint, November 3 complaints and December 0 complaints.
- Total Complaints originally submitted to TCO by complainants was 120 in the quarter as opposed to 149 last quarter.
- Total Complaints originally submitted to TCO by complainants in October was 36.
- Total Complaints originally submitted to TCO by complainants in November was 53.
- Total Complaints originally submitted to TCO by complainants in December was 31.
- Transurban sought to resolve directly 32 complaints in October, 2 complaints were referred to E-Toll in October.
- Transurban sought to resolve directly 44 complaints in November, 3 complaints were referred to E-Toll in November.
- Transurban sought to resolve directly 28 complaints in December, 1 complaint was referred to E-Toll in December.

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 come back for resolution by the TCO. As noted above in this quarter, we have seen some of those claims that have ultimately come back to the TCO to resolve.

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 the 3 previous quarters including this one are not consistent with the figures historically.

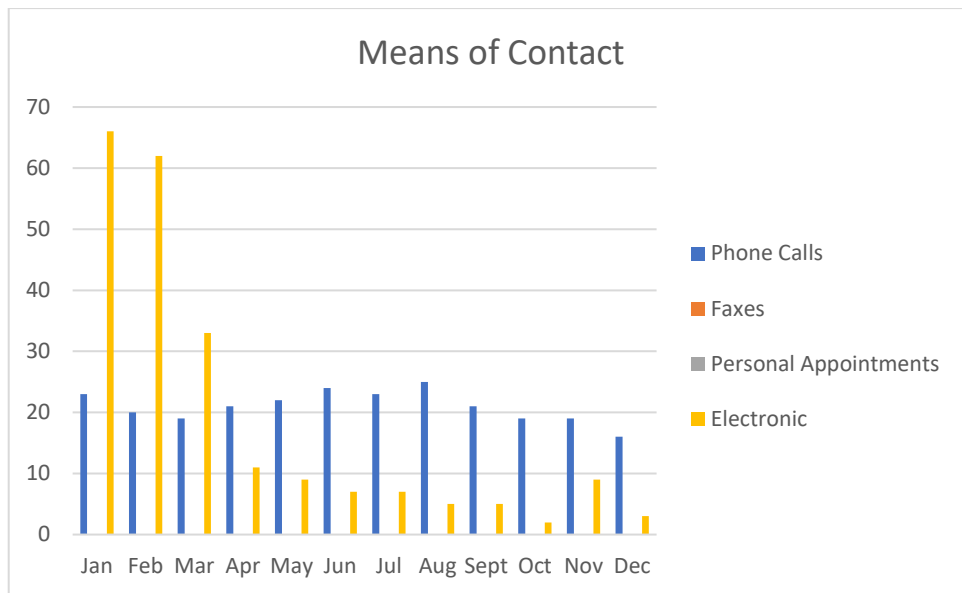
In this quarter, the figures establish that the new claims coming out of Queensland, New South Wales and Victoria are substantially similar although the sample size is very small. The figures indicate that the spike in complaints in Victoria as a result of the relatively new account management system implemented in Victoria 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 23. The key points relating to this reporting period are:

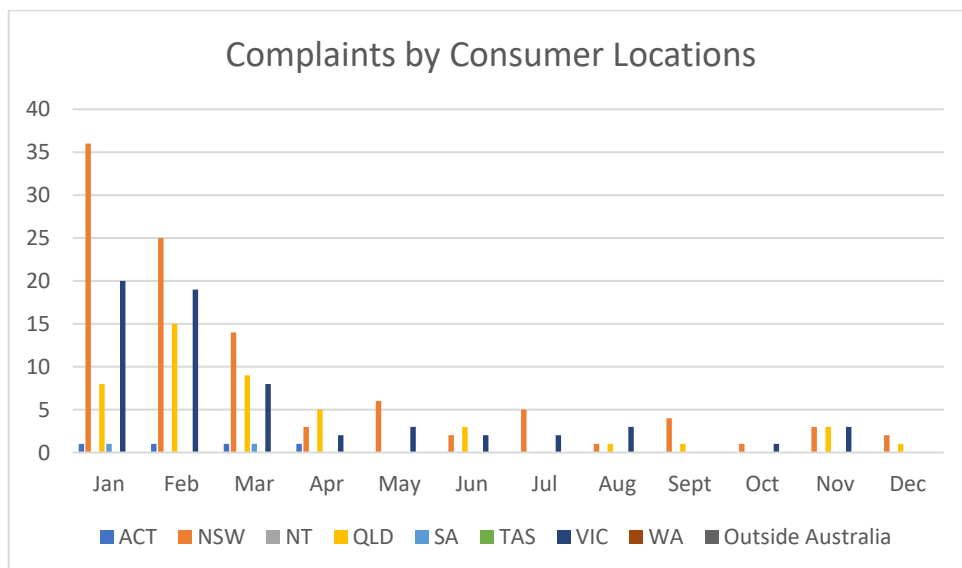
- The predominant means of contacting the TCO with a complaint continues to be electronically, either through the online complaint form or via email after downloading the complaint form from the website.
- Despite this, the TCO recognises that telephone contact continues to be very important for consumers 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 now an established 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 New South Wales tolling issues generally and the activities of debt collectors contracted by Transurban.

MEANS OF CONTACT WITH OMBUDSMAN



COMPLAINTS IN EACH JURISDICTION

- 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

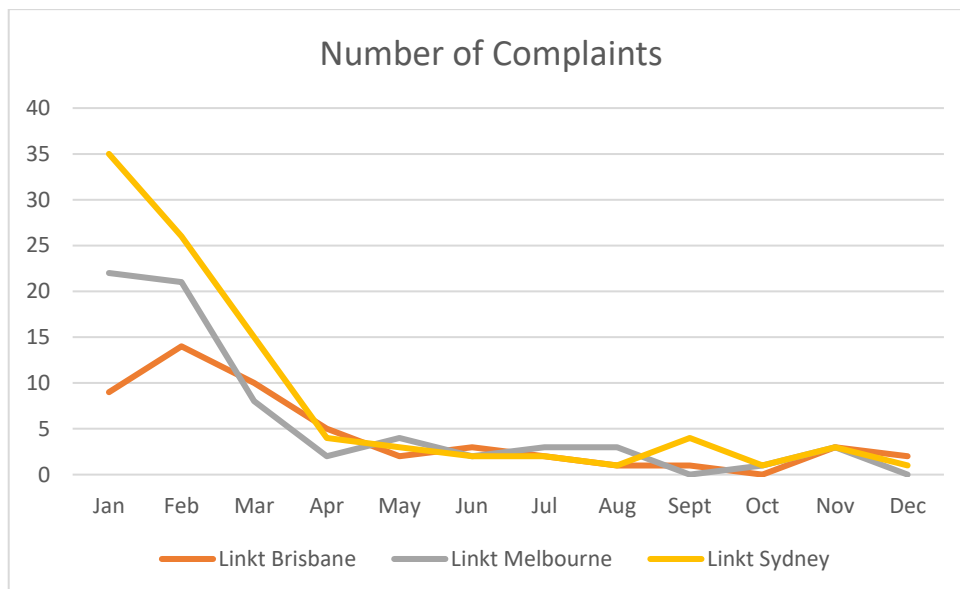
The refined process between Transurban and the TCO has had a significant impact on these present figures in each of New South Wales, Queensland and Victoria on a 12-month basis primarily because of the last 3 quarters. Once again, the long-term impact of the new process needs to be reviewed and assessed.

In the most recent 12-month period 219 complaints were received as follows:

- New South Wales consumers traditionally represent about 50% of the TCO workload, however for the reporting period it is less than 50%, i.e. 45% (98 complaints out of 219).
- Queensland consumers generally represent just over 20% of complaints and for the last 12 months it is just over 24%.
- Victoria generally represents approximately 30% of complaints. The rate for the last 12 months is substantially similar being 31%.
 - It now can be confirmed that the previous difficulties in Victoria have been resolved. The previous spike in complaints from Victoria was due to the implementation of a new customer interface system in Victoria.
 - Transurban made adjustments to the system, however, from the last few quarters it is evident that the number of complaints in Victoria are coming down aside from the new arrangements that have been implemented.
 - The TCO will continue to monitor carefully the claim figures in Victoria.

In the Ombudsman’s view, as the issues in Victoria have been rectified, we can see each states claim’s reverting to their historical percentage of total claims.

NUMBER OF COMPLAINTS IN THE LAST 12 MONTHS



LONGER TERM TRENDS IDENTIFIED

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.

Transurban need to ensure in particular that when potential claims are referred back by the TCO to the Transurban Customer Resolution Team that they are acted upon in a timely manner. Consumers, in these circumstances consider and have a perception that such claims have already been reviewed by other departments in Transurban so this process by the Customer Resolution Team should be streamlined and done quickly. In speaking with many of those consumers, they consider that the matter has already been dealt with by Transurban, and the matter was not resolved to their satisfaction so that is why they have contacted the TCO directly rather than going to the Customer Resolution Team.

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.

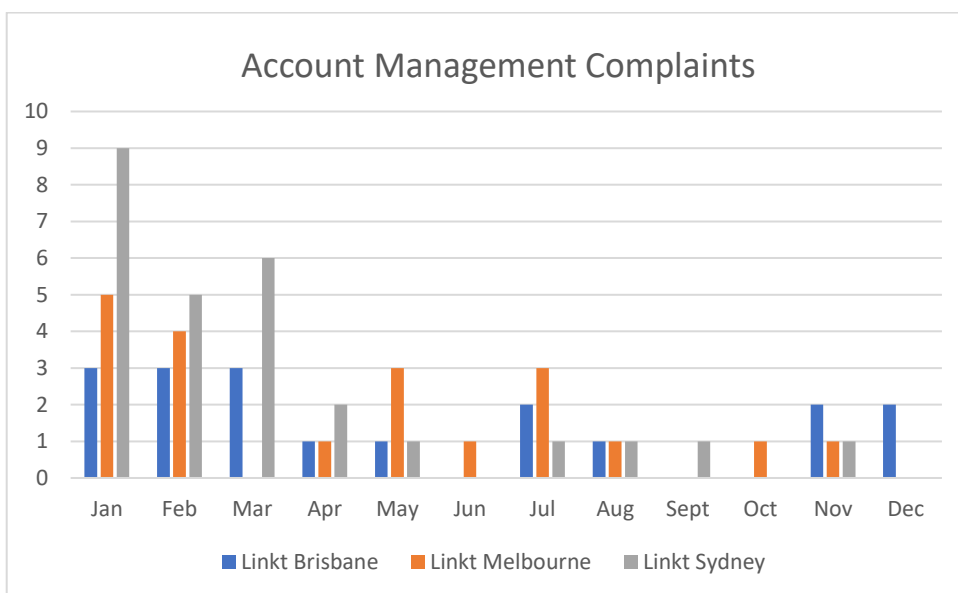
A preliminary assessment (yet to be verified definitively and the need to monitor the impact of the new arrangements over a longer period) is that the total per annum claim may not for the foreseeable future reach the 1000 claims.

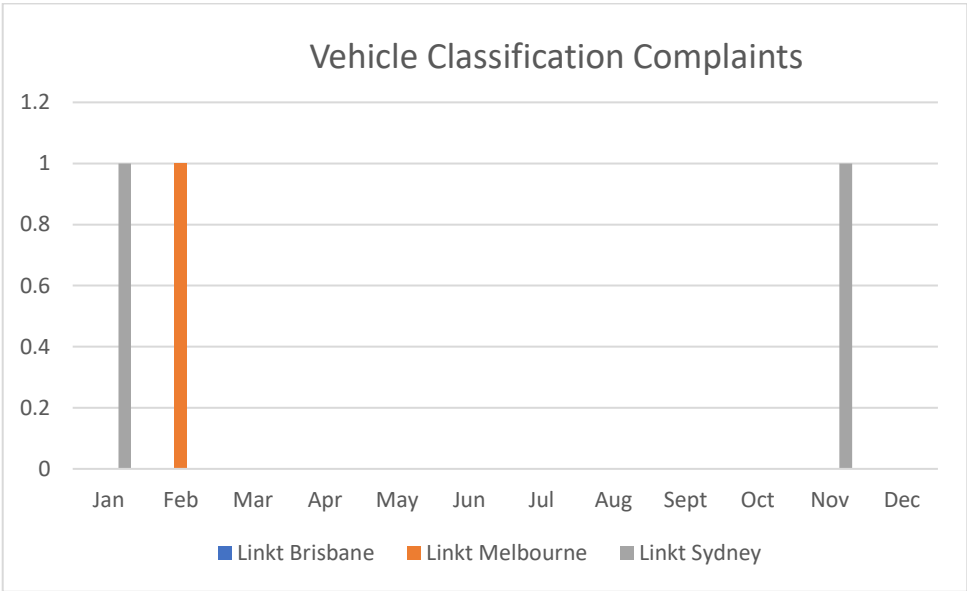
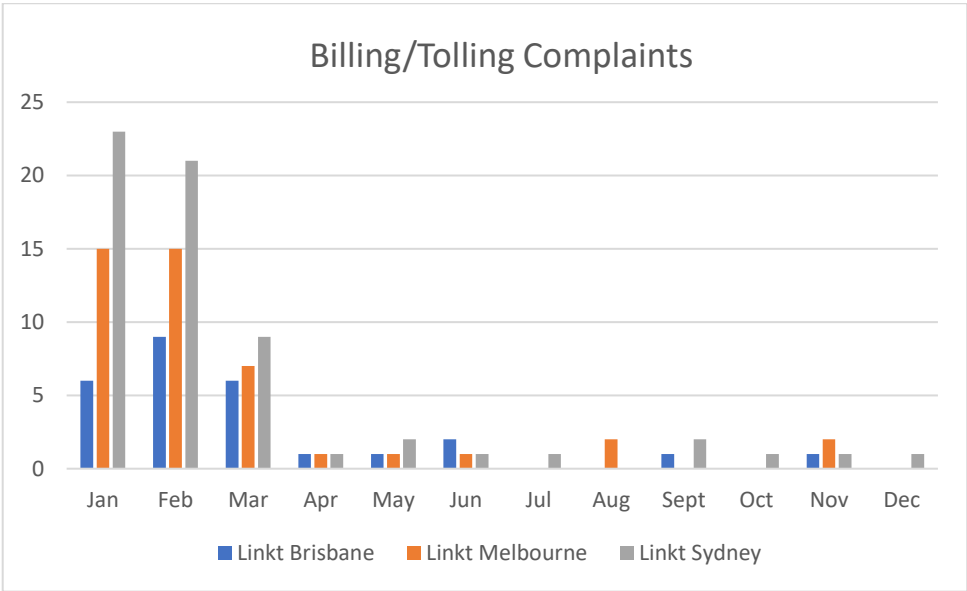
The nature of the complaints remains essentially the same. The main issues in the last year relate to Accounts Management and Billing/Tolling.

- This is most often the application of administrative fees or infringement fines and whether these have been properly incurred.
- In New South Wales consumers (owing to the recent publicity and parliamentary inquiry) are particularly concerned about Account Management complaints.

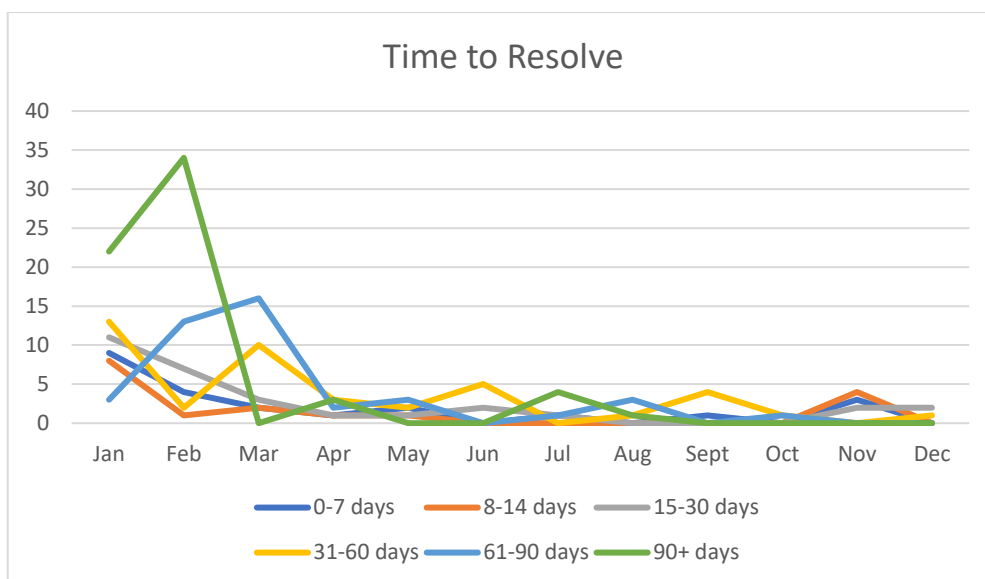
The TCO will continue to monitor developments in this area.

TYPE OF COMPLAINTS RECEIVED





THE TIME TAKEN TO RESOLVE COMPLAINTS



The time taken for the Toll Operator to resolve complaints is still taking longer than it should.

- In short whilst there are fewer complaints being made it seems from the data each complaint is taking longer to resolve over the last 3 quarters
- In the most recent quarter:
 - Queensland saw an improvement in timeliness in this quarter from the July to September figures.
 - New South Wales and Victoria both had decreases in the time taken to resolve in the last quarter and an improvement since the July to September period.
 - There was a significant spike in Victoria a year or so ago but there has been a reduction in the last few quarters.

PRELIMINARY ASSESSMENT OF REFINEMENTS ON THE TIME TAKEN TO RESOLVE COMPLAINTS

- Over the 9-month period of the new arrangements albeit that it is a small sample size, there has been no reduction in the 31-60 and 90 day categories. In fact, it seems that disputes are generally taking longer to resolve. The issue of timeliness still needs to be monitored by the TCO. There are still matters that are outside this quarter that need input from and progression on by Transurban.
- 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.
- Once again, Transurban need to ensure in particular that when potential claims are referred back by the TCO to the Transurban Customer Resolution Team that they are acted upon by that team in a timely manner. Consumers, in these circumstances consider and have a perception that such claims have already been reviewed by other departments in Transurban so this process by the Customer Resolution Team should be streamlined and done quickly. In speaking with many of those consumers, they consider that the matter has already been dealt with by Transurban, and the matter was not resolved to their satisfaction so that is why they have contacted the TCO.

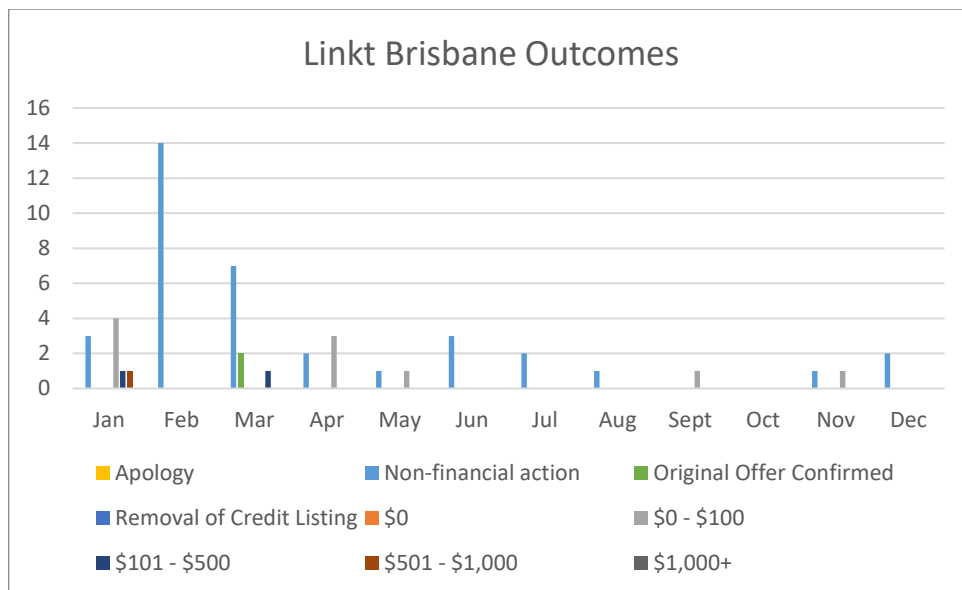
- The TCO at his quarterly meetings with Transurban, raised this issue as one that needed to be monitored and addressed. Transurban has indicated to the TCO that they have put more staff on to seek to reduce the time delays in responding to complaints.
- It would seem also that Transurban is adopting a different categorisation of what matters constitute a dispute with customers internally and some feedback from customers that were previously considered to be disputes are no longer characterised as a dispute. In our view it is important that there be consistency of categorisation of these matters for consumers to give them certainty as to process of resolving these matters.

GENERAL OBSERVATIONS ON RESOLUTION AND DEBT LEVELS

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.

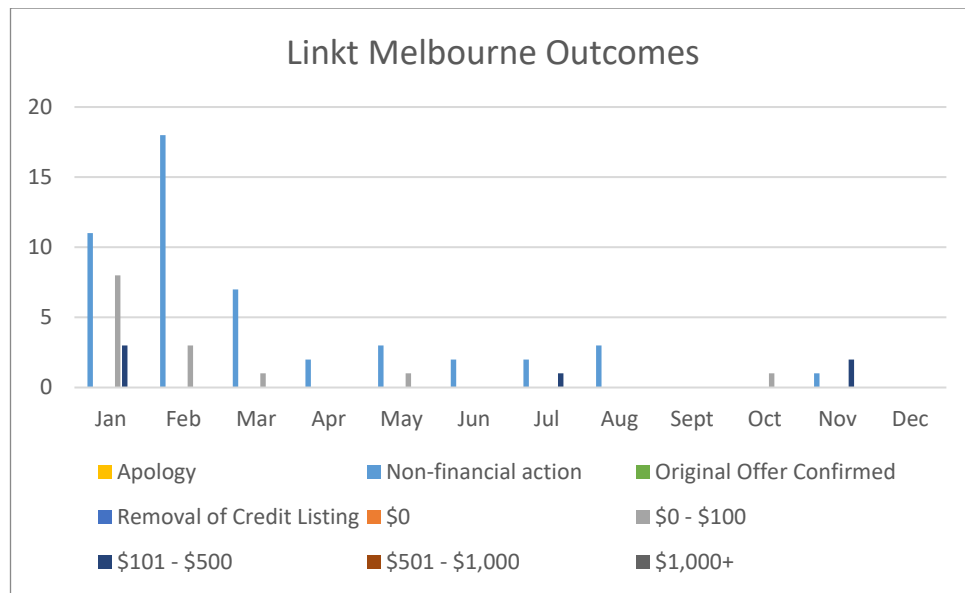
LINKT BRISBANE OUTCOMES



Subject to the refined process and confirmation of the longer-term impact of these arrangements the complaint demographics for Queensland (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.

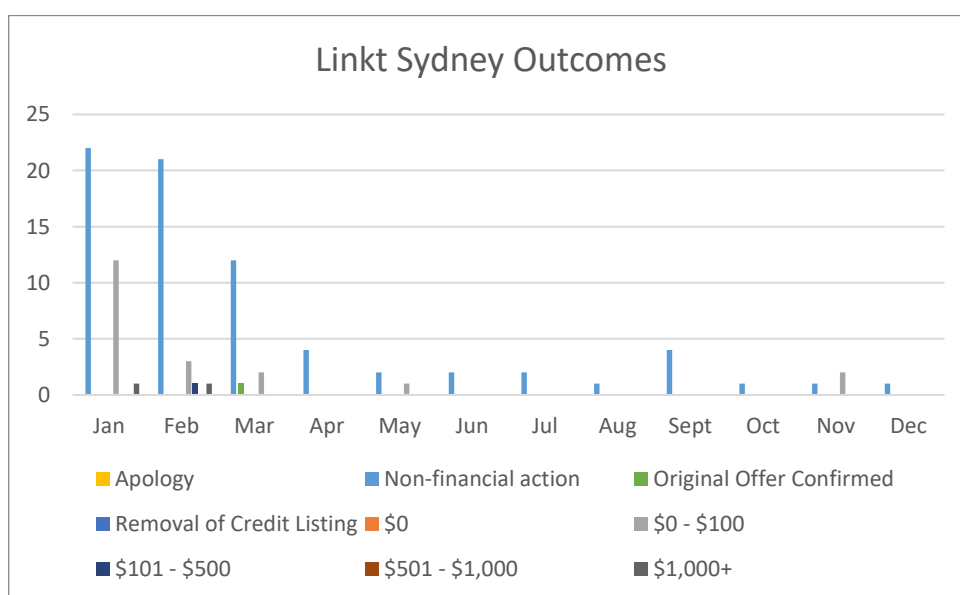
LINKT MELBOURNE OUTCOMES



Subject to the refined process and confirmation of the longer-term impact of these arrangements the complaint demographics for Victoria (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.

LINKT SYDNEY OUTCOMES



Subject to the refined process and confirmation of the longer-term impact of these arrangements the complaint demographics for New South Wales (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 New South Wales 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 short 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 2024

TCO Contact Types	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	
Phone Calls	23	20	19	21	22	24	23	25	21	19	19	16	
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	66	62	33	11	9	7	7	5	5	2	9	3	
TOTAL	89	82	52	32	31	31	30	30	26	21	28	19	
TCO Consumer Locations	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	
ACT	1	1	1	1	0	0	0	0	0	0	0	0	4
NSW	36	25	14	3	6	2	5	1	4	1	3	2	96
NT	0	0	0	0	0	0	0	0	0	0	0	0	0
QLD	8	15	9	5	0	3	0	1	1	0	3	1	42
SA	1	0	1	0	0	0	0	0	0	0	0	0	2
TAS	0	0	0	0	0	0	0	0	0	0	0	0	0
VIC	20	19	8	2	3	2	2	3	0	1	3	0	59
WA	0	0	0	0	0	0	0	0	0	0	0	0	0
Outside Australia	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	66	62	33	11	9	7	7	5	5	2	9	3	44
Complaint Numbers	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	
Linkt Brisbane	9	14	10	5	2	3	2	1	1	0	3	2	47
Linkt Melbourne	22	21	8	2	4	2	3	3	0	1	3	0	65
Linkt Sydney	35	26	15	4	3	2	2	1	4	1	3	1	92
TOTAL	66	61	33	11	9	7	7	5	5	2	9	3	44
Time Taken to Resolve	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	
0-7 days	9	4	2	1	2	0	1	0	1	0	3	0	20
8-14 days	8	1	2	1	1	0	0	0	0	0	4	0	13
15-30 days	11	7	3	1	1	2	1	0	0	0	2	2	26
31-60 days	13	2	10	3	2	5	0	1	4	1	0	1	40
61-90 days	3	13	16	2	3	0	1	3	0	1	0	0	41
90+ days	22	34	0	3	0	0	4	1	0	0	0	0	64
TOTAL	66	61	33	11	9	7	7	5	5	2	9	3	204
Linkt Brisbane Outcomes	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	
Apology	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-financial action	3	14	7	2	1	3	2	1	0	0	1	2	33
Original Offer Confirmed	0	0	2	0	0	0	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	4	0	0	3	1	0	0	0	1	0	1	0	9
\$101 - \$500	1	0	1	0	0	0	0	0	0	0	0	0	2
\$501 - \$1,000	1	0	0	0	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	9	14	10	5	2	3	2	1	1	0	2	2	47

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	
Linkt Melbourne Outcomes													0
Apology	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-financial action	11	18	7	2	3	2	2	3	0	0	1	0	48
Original Offer Confirmed	0	0	0	0	0	0	0	0	0	0	0	0	0
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	3	1	0	1	0	0	0	0	1	0	0	13
\$101 - \$500	3	0	0	0	0	0	1	0	0	0	2	0	4
\$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	22	21	8	2	4	2	3	3	0	1	3	0	65
													0
Linkt Sydney Outcomes													0
Apology	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-financial action	22	21	12	4	2	2	2	1	4	1	1	1	70
Original Offer Confirmed	0	0	1	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	12	3	2	0	1	0	0	0	0	0	2	0	18
\$101 - \$500	0	1	0	0	0	0	0	0	0	0	0	0	1
\$501 - \$1,000	0	0	0	0	0	0	0	0	0	0	0	0	0
\$1,000+	1	1	0	0	0	0	0	0	0	0	0	0	2
TOTAL	35	26	15	4	3	2	2	1	4	1	3	1	92
													0
Account Management Complaints													0
Linkt Brisbane	3	3	3	1	1	0	2	1	0	0	2	2	14
Linkt Melbourne	5	4	0	1	3	1	3	1	0	1	1	0	18
Linkt Sydney	9	5	6	2	1	0	1	1	1	0	1	0	26
TOTAL	17	12	9	4	5	1	6	3	1	1	4	2	58
													0
Billing / Tolling Complaints													0
Linkt Brisbane	6	9	6	1	1	2	0	0	1	0	1	0	26
Linkt Melbourne	15	15	7	1	1	1	0	2	0	0	2	0	42
Linkt Sydney	23	21	9	1	2	1	1	0	2	1	1	1	60
TOTAL	44	45	22	3	4	4	1	2	3	1	4	1	128
													0
Vehicle Classification Complaints													0
Linkt Brisbane	0	0	0	0	0	0	0	0	0	0	0	0	0
Linkt Melbourne	0	1	0	0	0	0	0	0	0	0	0	0	1
Linkt Sydney	1	0	0	0	0	0	0	0	0	0	1	0	1
TOTAL	1	1	0	0	0	0	0	0	0	0	1	0	2
													0

Infrastructure / Signage Traffic Management Complaints	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	0
Linkt Brisbane	0	0	0	0	0	1	0	0	0	0	0	0	1
Linkt Melbourne	0	0	0	0	0	0	0	0	0	0	0	0	0
Linkt Sydney	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	1	0	0	0	0	0	0	1
													0
Average Time To Resolve	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	0
Linkt Brisbane	53.78	78.57	45.70	34.40	28.50	31.67	101.50	142.00	6.00	0	11.00	19.50	272.6159
Linkt Melbourne	25.09	74.24	57.63	85.00	40.25	35.00	29.67	72.00	0	38.00	10.00	0	317.204
Linkt Sydney	74.23	82.42	52.73	64.00	41.67	46.00	109.50	58.00	46.75	76.00	12.67	33.00	361.0516