

TCO Review

1 July to 30 September 2023

Phillip Davies

Tolling Customer Ombudsman

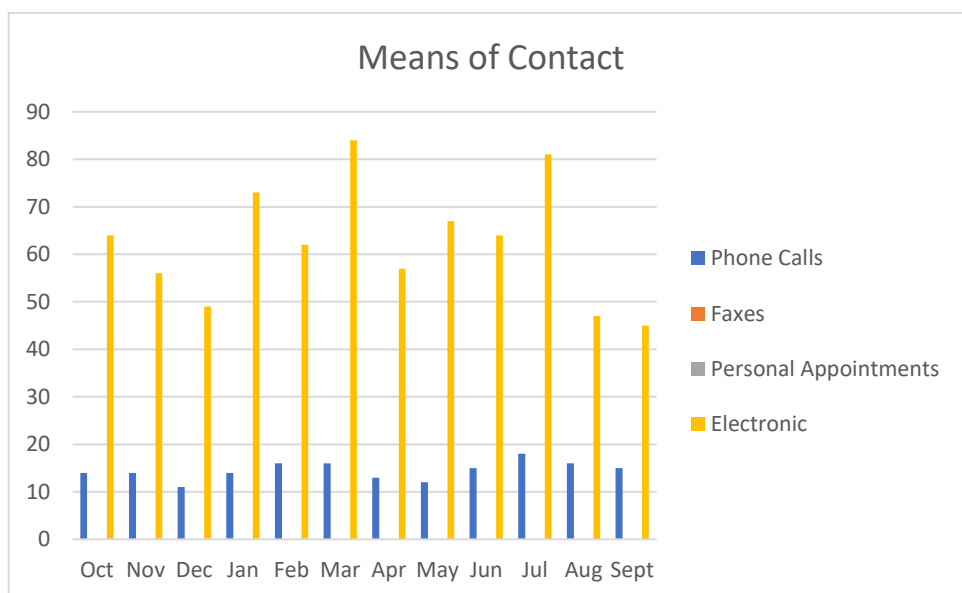
GENERAL TRENDS

- The total number of claims this quarter of 173 is similar to previous quarters apart from the January to March 2023 quarter.
- In the quarter of January to March 2023 there were 219 claims:
 - Queensland numbers in this quarter are a little higher than for the previous quarters, at 40 claims.
 - New South Wales claims are relatively low compared to this time last year but are similar to other recent quarters.
- The quarter was heavily impacted by the 113 claims in Victoria, however...
 - Claims in Victoria for this quarter are reducing and coming back to more normal levels particularly for August and September 2023.
 - Despite this, they are still relatively very high in the context of the overall proportion of claims to the overall national claims.
 - We anticipate the Toll Operator will taking all reasonable steps to reduce the complaint numbers in Victoria over the next few quarters.
 - The TCO will actively monitor the figures in Victoria as there have been spikes in complaint numbers in the last 12 months.
- This trend in Victoria is also reflected in the figure of 749 complaints nationally for the 12-month period (ending 30 September 2023), especially for the last 3 quarters of the year.
- However, 749 claims may not be too unexpected, given this is moving towards, but has not yet reached the total number of complaints in the pre-COVID-19 environment.

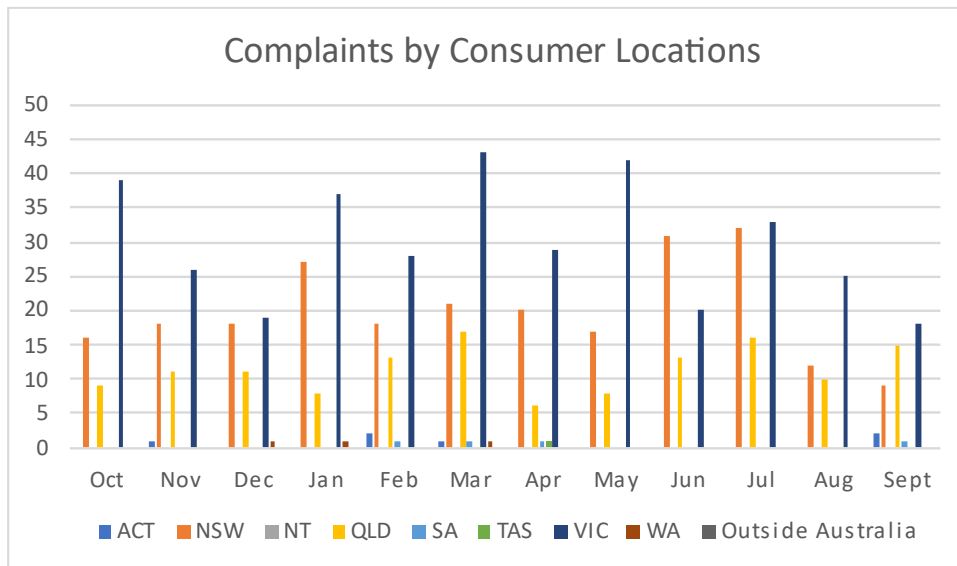
COMPLAINT RESOLUTION

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 18.

- 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.
- These calls give the TCO the opportunity to ask consumers:
 - whether they have sought to resolve the matter via the Linkt's 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 also recognises that verbal communication is more convenient for some or 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.



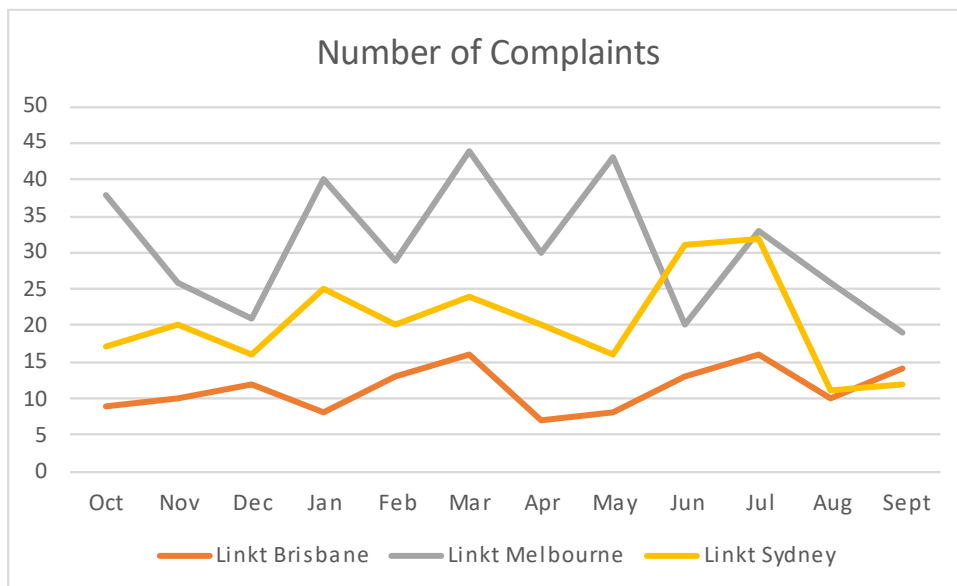
- TCO operates across toll roads in three states in Australia – New South Wales, Queensland and Victoria, but is available for all consumers of those toll roads regardless of the consumer's location of residence.



COMPLAINT INFORMATION

The most recent 12-month figures show complaint numbers are again rising.

- In the most recent 12-month period 749 complaints were received:
 - 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. 32% (243 complaints out of 749)
 - Queensland consumers generally represent just over 20% of complaints but for the last 12 months it is approximately 19%
 - Victoria generally represents approximately 30% of complaints. Despite this, the rate for the last 12 months is significantly higher, having increased to 49%
 - Initially, it was clear this spike in complaints from Victoria was contributed to by the implementation of a new customer interface system in Victoria.
 - Despite the Toll Operators adjustments to the system however, the increase in complaints has been sustained for some time now, indicating other factors may be at play.
 - These may include the extent of infrastructure works in Victoria moving road users onto toll roads or simply a return to pre-COVID levels of travel on the toll roads.



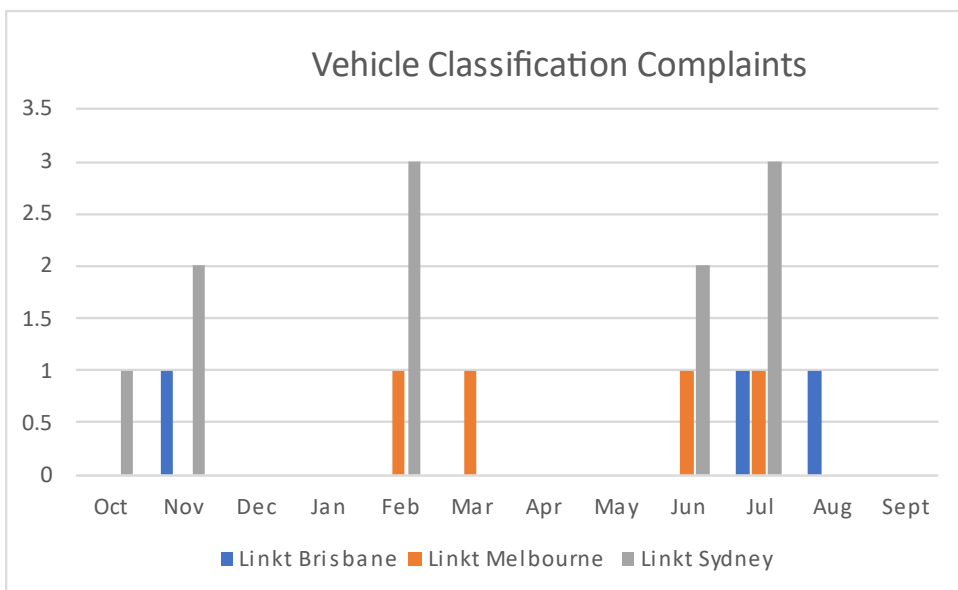
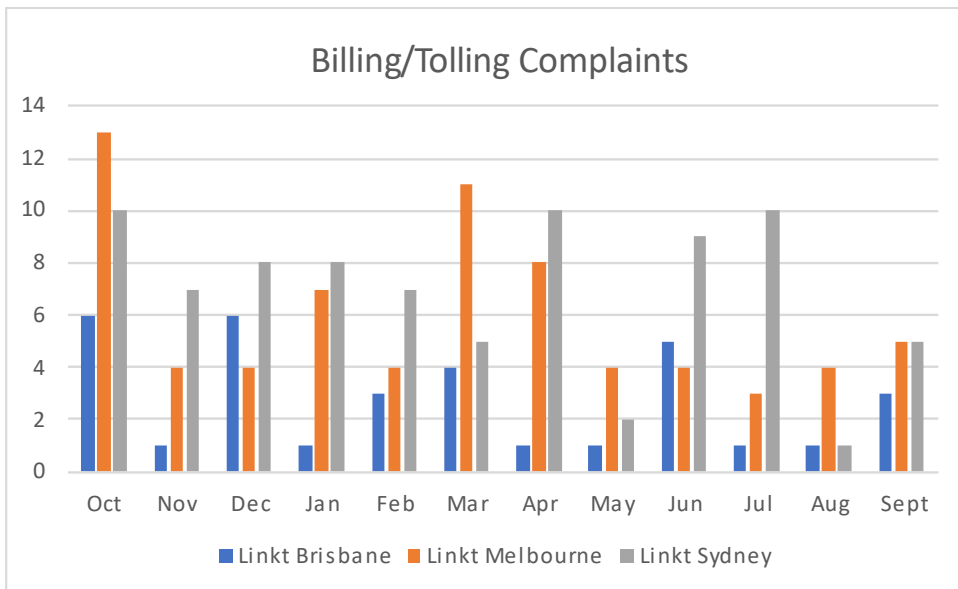
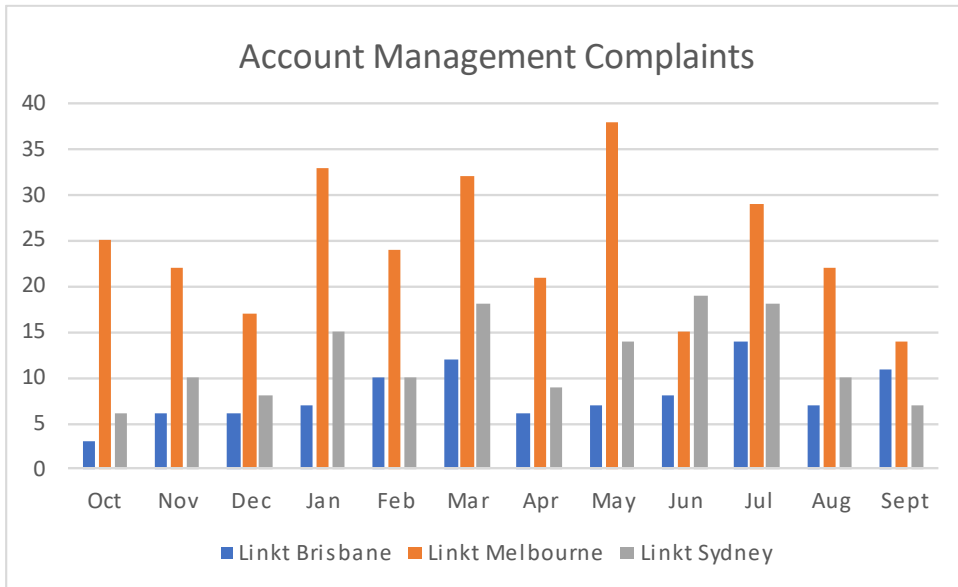
Overall, however, some longer-term trends can be identified:

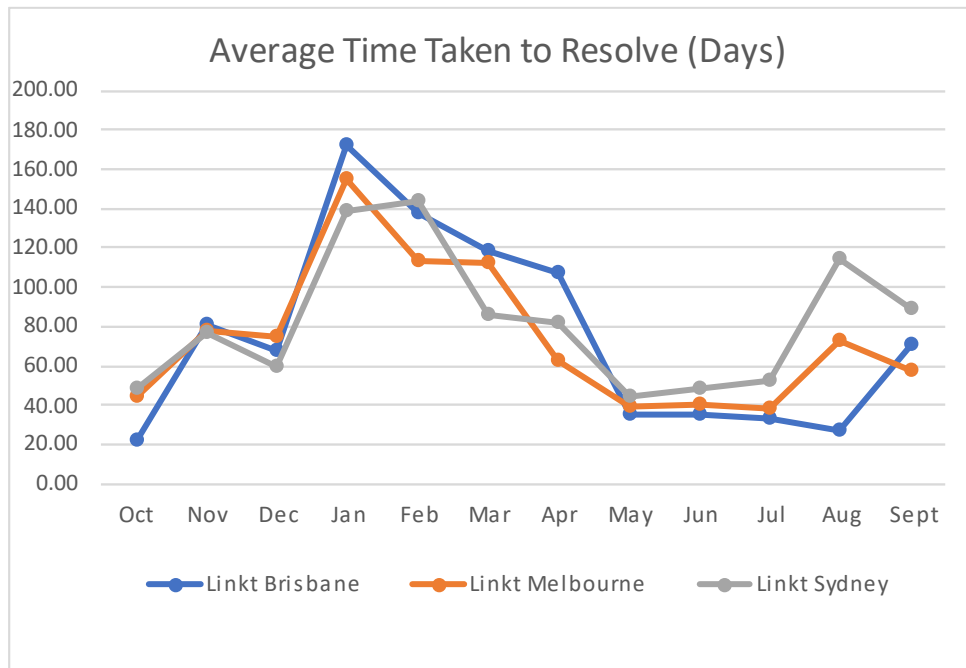
- The TCO notes the Toll Operator's increased focus on its customer experience and internal dispute resolution process. This should enable complaints to be resolved quicker and without the need for referral to the TCO. This will reduce the number of complaints received and so over the long term the TCO expects complaint numbers to drop in all states.
- The Toll Operator has also now been operating its current approach to Financial Hardship for some time and the results have been encouraging – demonstrated by a downturn in the number of financial hardship complaints which are referred to the TCO.
- Prior to COVID, the TCO averaged 1,000 complaints per year under the Scheme and so expected approximately 250 complaints per quarter.
- During COVID this dropped significantly as lockdowns prevented the same level of usage.
- However, 749 complaints in the last 12-month period are an increase on the prior 12 month period and the ongoing trend appears to be complaint numbers may be approach pre-COVID levels within 6 months if the trend continues.
- This is not to say the news is all discouraging. The total of 173 complaints made in the present quarter is a decrease on the number of complaints in the previous two quarters.

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 last four quarters, there seems to be a significant increase in Account Management complaints.

The TCO will continue to monitor developments in this area.





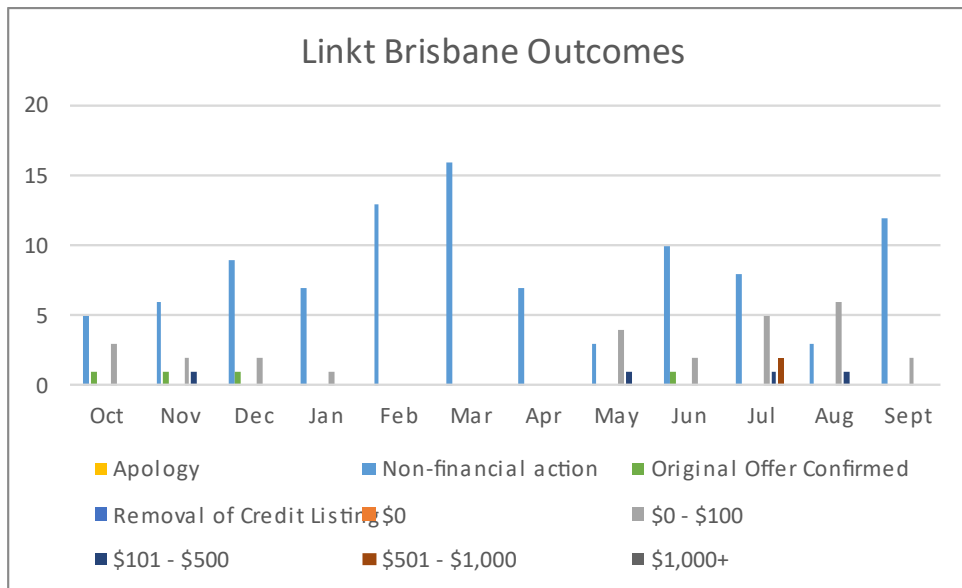
In addition to the increasing complaint numbers, the time taken for the Toll Operator to resolve complaints has been increasing, but not universally:

- In the four most recent quarters, 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 Transurban to respond to claims that have been referred to them through the TCO System.
- 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 August, but a significant drop off on this metric in September.
 - NSW and VIC both had significant increases in the time taken to resolve in August, but these improved in September, albeit not back to the levels they were in either start for the quarter prior.
- Over the reporting period however, there have been overall increases in the 31-60 and 90 day categories - indicating an overall reduction in timeliness of complaint handling for the last 12 months.
- The TCO at his quarterly meetings with Transurban, raised this issue as one that needed to be monitored and addressed.

In more positive news, consumer outcomes are improving:

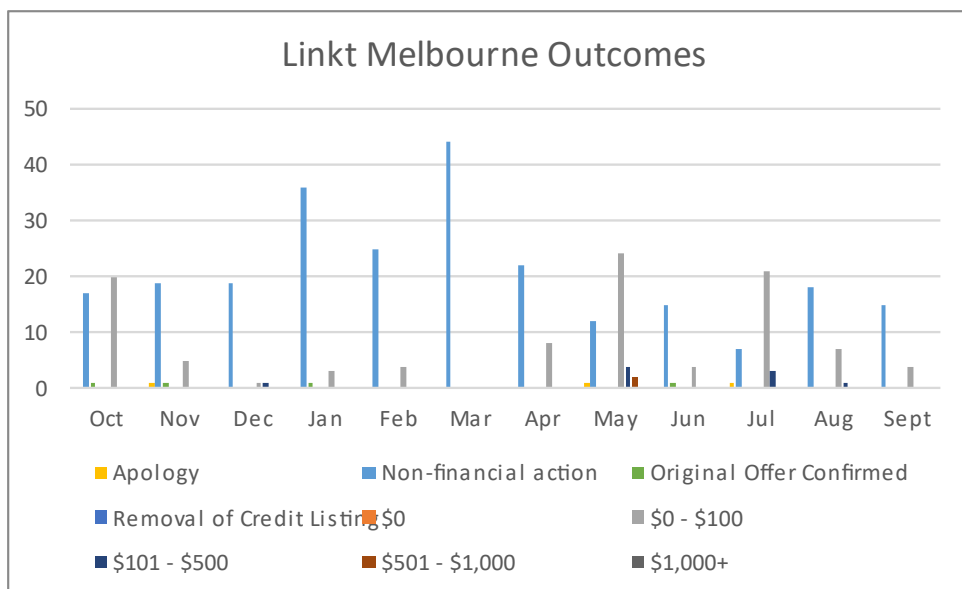
- Where a resolution is achieved, generally the outcome can range from non-financial actions to an acceptance of an original offer to resolve, or a financial benefit from waiver of an amount of debt or a payment.

- 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.



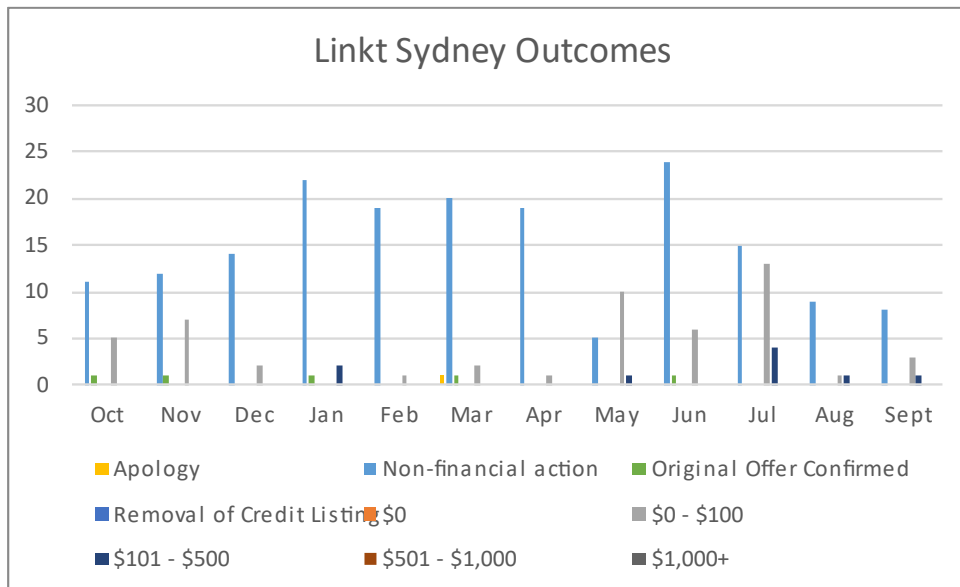
The complaint demographics for QLD (resolved by Linkt Brisbane) remain generally steady:

- 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.



The complaint demographics for VIC (resolved by Linkt Melbourne):

- have seen a significant increase in complaint numbers over the last four 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 last quarter.



The complaint demographics for NSW (resolved by Linkt Sydney):

- generally, 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 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.
 - 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 make 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.
- 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.
- In the quarterly meetings with the Toll Operator, the TCO continues to raise these issues with the Toll Operator as a consumer concern.
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APPENDIX 1: RAW DATA 2022/2023

TCO Contact Types	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
Phone Calls	14	14	11	14	16	16	13	12	15	18	16	15	
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	64	56	49	73	62	84	57	67	64	81	47	45	
TOTAL	78	70	60	87	78	100	70	79	79	99	63	60	
TCO Consumer Locations													
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
ACT	0	1	0	0	2	1	0	0	0	0	0	2	6
NSW	16	18	18	27	18	21	20	17	31	32	12	9	239
NT	0	0	0	0	0	0	0	0	0	0	0	0	0
QLD	9	11	11	8	13	17	6	8	13	16	10	15	137
SA	0	0	0	0	1	1	1	0	0	0	0	1	4
TAS	0	0	0	0	0	0	1	0	0	0	0	0	1
VIC	39	26	19	37	28	43	29	42	20	33	25	18	359
WA	0	0	1	1	0	1	0	0	0	0	0	0	3
Outside Australia	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	9	10	12	8	13	16	7	8	13	16	10	14	136
Linkt Melbourne	38	26	21	40	29	44	30	43	20	33	26	19	369
Linkt Sydney	17	20	16	25	20	24	20	16	31	32	11	12	244
TOTAL	64	56	49	73	62	84	57	67	64	81	47	45	749
Time Taken to Resolve													
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
0-7 days	12	6	0	1	5	0	7	7	6	14	4	3	65
8-14 days	6	1	0	7	3	5	2	5	2	7	5	4	47
15-30 days	18	4	5	8	4	12	6	14	15	20	8	11	125
31-60 days	7	8	18	0	1	0	13	34	23	25	11	6	146
61-90 days	13	18	10	0	0	0	7	1	18	5	0	1	73
90+ days	8	19	16	57	49	67	22	6	0	10	19	20	293
TOTAL	64	56	49	73	62	84	57	67	64	81	47	45	749
Linkt Brisbane Outcomes													
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
Apology	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-financial action	5	6	9	7	13	16	7	3	10	8	3	12	99
Original Offer Confirmed	1	1	1	0	0	0	0	0	1	0	0	0	4
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	3	2	2	1	0	0	0	4	2	5	6	2	27
\$101 - \$500	0	1	0	0	0	0	0	1	0	1	1	0	4
\$501 - \$1,000	0	0	0	0	0	0	0	0	0	2	0	0	2
\$1,000+	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	9	10	12	8	13	16	7	8	13	16	10	14	136

Linkt Melbourne Outcomes	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
Apology	0	1	0	0	0	0	0	1	0	1	0	0	3
Non-financial action	17	19	19	36	25	44	22	12	15	7	18	15	249
Original Offer Confirmed	1	1	0	1	0	0	0	0	1	0	0	0	4
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	20	5	1	3	4	0	8	24	4	21	7	4	101
\$101 - \$500	0	0	1	0	0	0	0	4	0	3	1	0	9
\$501 - \$1,000	0	0	0	0	0	0	0	2	0	0	0	0	2
\$1,000+	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	38	26	21	40	29	44	30	43	20	32	26	19	368
Linkt Sydney Outcomes	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
Apology	0	0	0	0	0	1	0	0	0	0	0	0	1
Non-financial action	11	12	14	22	19	20	19	5	24	15	9	8	178
Original Offer Confirmed	1	1	0	1	0	1	0	0	1	0	0	0	5
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	7	2	0	1	2	1	10	6	13	1	3	51
\$101 - \$500	0	0	0	2	0	0	0	1	0	4	1	1	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	17	20	16	25	20	24	20	16	31	32	11	12	244
Account Management Complaints	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
Linkt Brisbane	3	6	6	7	10	12	6	7	8	14	7	11	97
Linkt Melbourne	25	22	17	33	24	32	21	38	15	29	22	14	292
Linkt Sydney	6	10	8	15	10	18	9	14	19	18	10	7	144
TOTAL	34	38	31	55	44	62	36	59	42	61	39	32	533
Billing / Tolling Complaints	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
Linkt Brisbane	6	1	6	1	3	4	1	1	5	1	1	3	33
Linkt Melbourne	13	4	4	7	4	11	8	4	4	3	4	5	71
Linkt Sydney	10	7	8	8	7	5	10	2	9	10	1	5	82
TOTAL	29	12	18	16	14	20	19	7	18	14	6	13	186
Vehicle Classification Complaints	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
Linkt Brisbane	0	1	0	0	0	0	0	0	0	1	1	0	3
Linkt Melbourne	0	0	0	0	1	1	0	0	1	1	0	0	4
Linkt Sydney	1	2	0	0	3	0	0	0	2	3	0	0	11
TOTAL	1	3	0	0	4	1	0	0	3	5	1	0	18

**Infrastructure /
Signage Traffic
Management
Complaints**

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
Linkt Brisbane	0	0	0	0	0	0	0	0	0	0	1	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	0	0	0	0	0	1	0	1

**Average Time To
Resolve**

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept
Linkt Brisbane	22.00	80.50	67.17	172.00	137.23	118.63	107.14	35.25	34.85	32.69	26.80	70.36
Linkt Melbourne	44.82	77.58	74.29	154.98	113.45	112.52	62.40	39.58	39.80	38.03	72.85	57.74
Linkt Sydney	48.53	76.70	59.75	138.72	143.35	86.21	81.70	44.38	48.39	52.06	114.00	88.92