

TCO Review

1 October to 31 December 2023

Phillip Davies

Tolling Customer Ombudsman

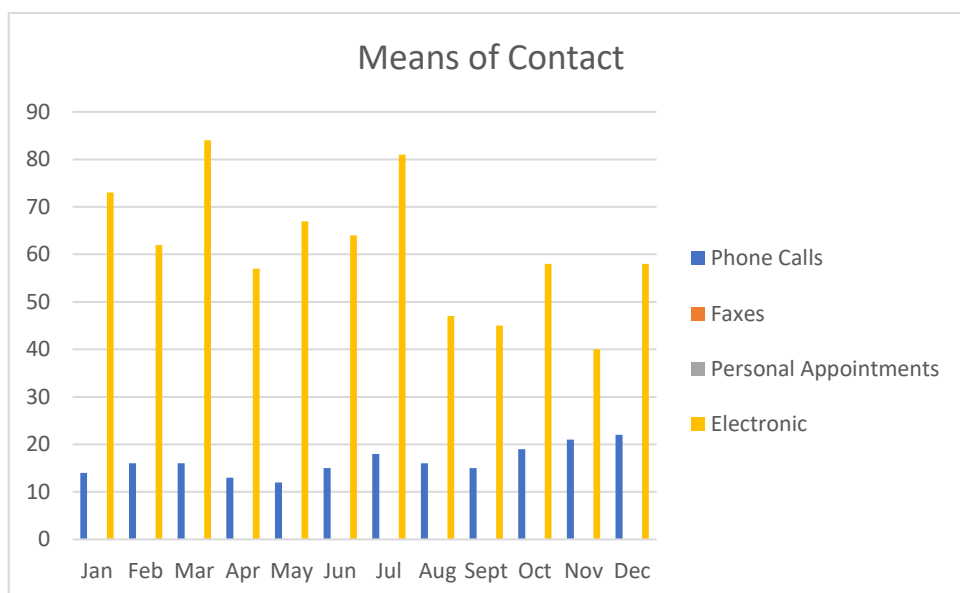
GENERAL TRENDS

- The total number of claims this quarter of 156 is a reduction in numbers for previous quarters and much less than the January to March 2023 quarter being 219 claims.
- In this quarter the figures establish:
 - Queensland numbers in this quarter are a little higher than for the previous quarters, at 35 claims. This number is slightly up on the previous quarter by one or two claims.
 - New South Wales claims are relatively low compared to this time last year and are slightly down on recent quarters.
- The quarter was heavily impacted by the 71 claims in Victoria, however...
 - Claims in Victoria for this quarter are reducing and coming back to more normal levels and are a significant reduction on the 113 claims last quarter.
 - 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. In discussions with the Toll Operator, they confirm that the actions they have taken including having more operatives dedicated to these matters will have a positive impact on the reduction of these figures.
 - The TCO will continue to 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 736 complaints nationally for the 12-month period (ending 31 December 2023), especially for the first 3 quarters of the year.
- However, 736 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. The total number of complaints per year prior to Covid was approximately a thousand claims.

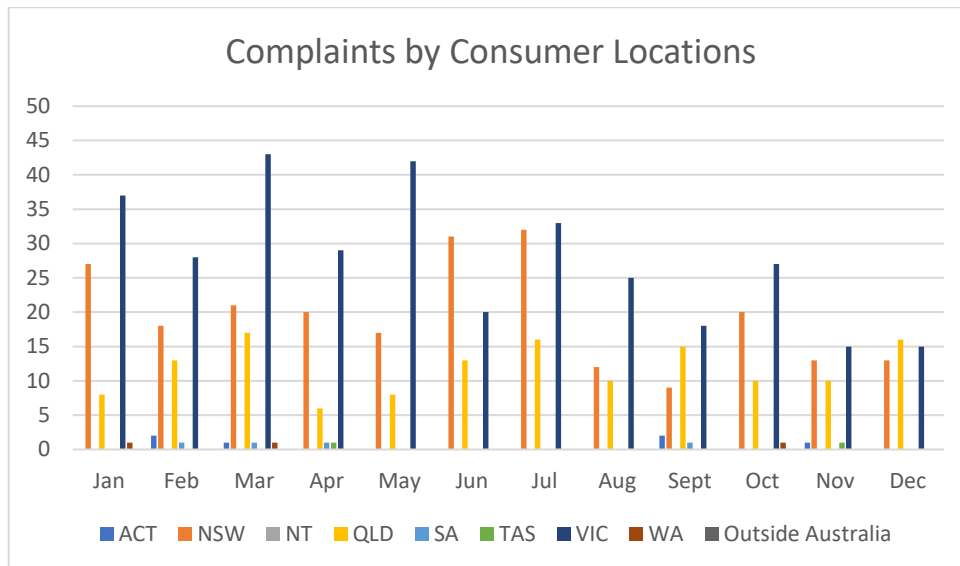
COMPLAINT RESOLUTION

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 19.

- 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 there was more telephone calls to the TCO during this quarter. The TCO will monitor this over the next few quarters to determine whether this is a one off or a continuing trend.
- 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. These include at the moment, account management issues and the activities of debt collectors of the Toll Operator.



- 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.

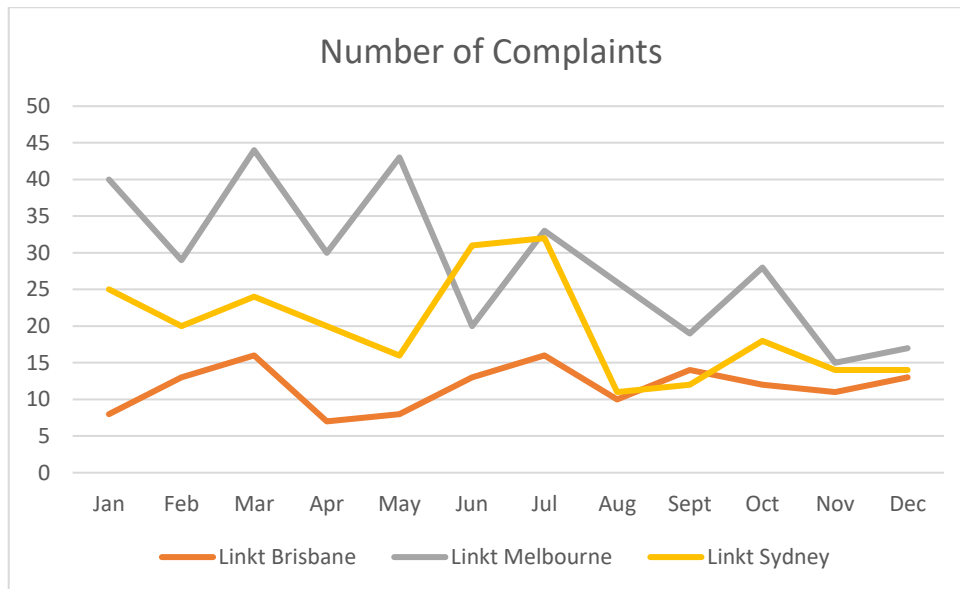


COMPLAINT INFORMATION

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

- In the most recent 12-month period 736 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% (240 complaints out of 736)
 - 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.

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.



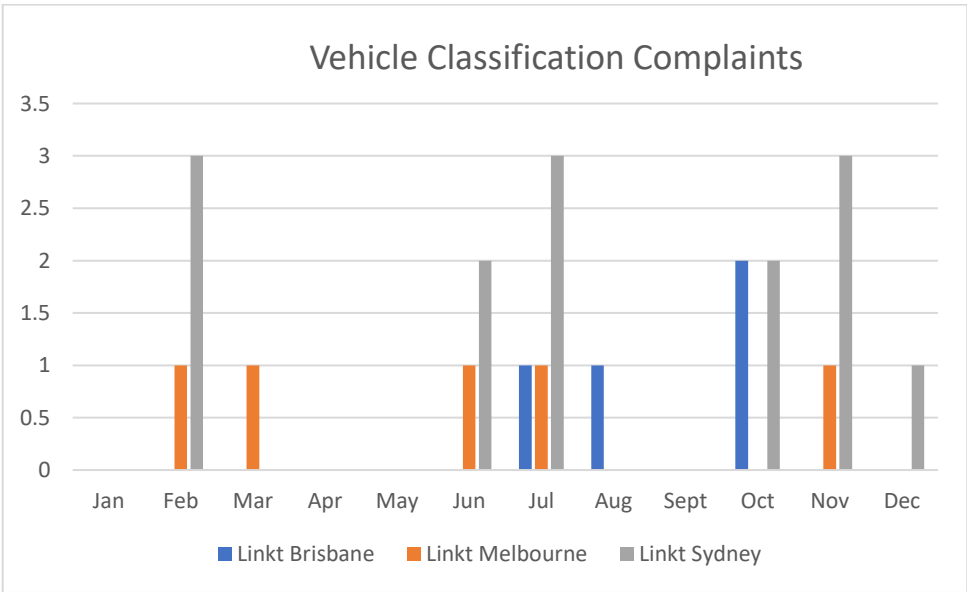
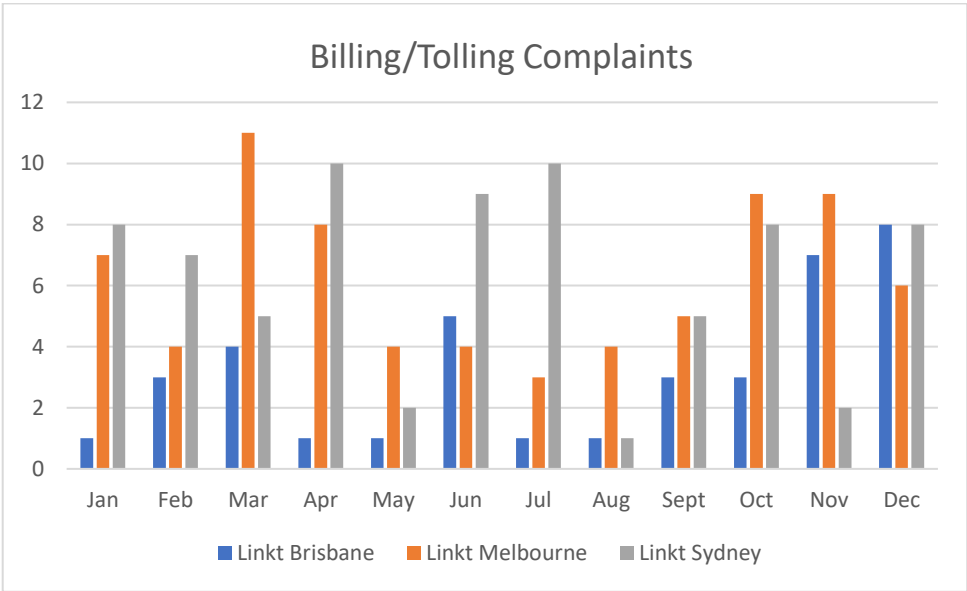
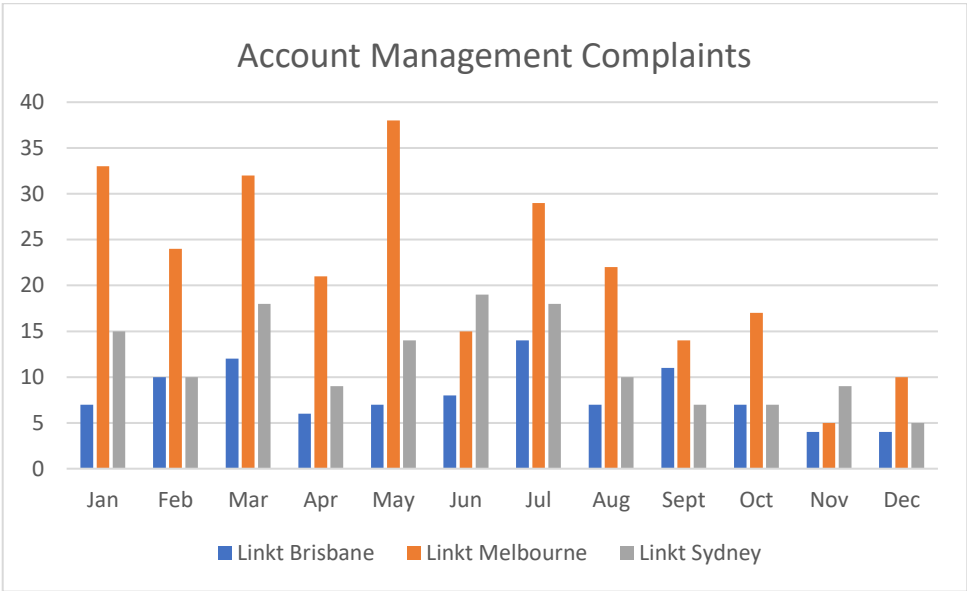
Overall, some longer-term trends can be identified:

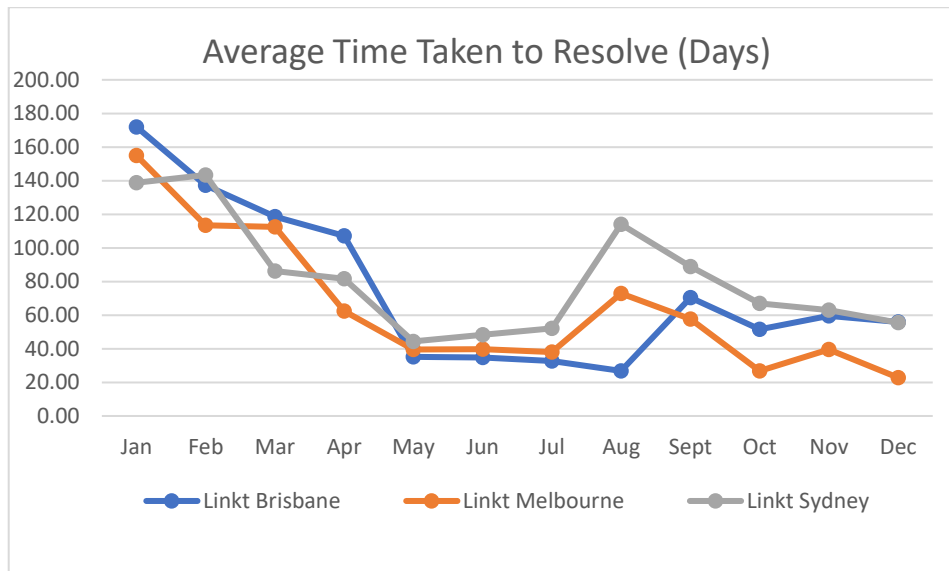
- The TCO notes the Toll Operator's increased focus on its customer experience and internal dispute resolution process. This should enable complaints to be resolved quicker and without the need for referral to the TCO. This will reduce the number of complaints received and so over the long term the TCO 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 anecdotally 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, 736 complaints in the last 12-month period are an increase on the prior 12 month period and the ongoing trend appears to be that complaint numbers may approach pre-COVID levels within 6 months if the trend continues.
- This is not to say the news is all discouraging. The total of 156 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.



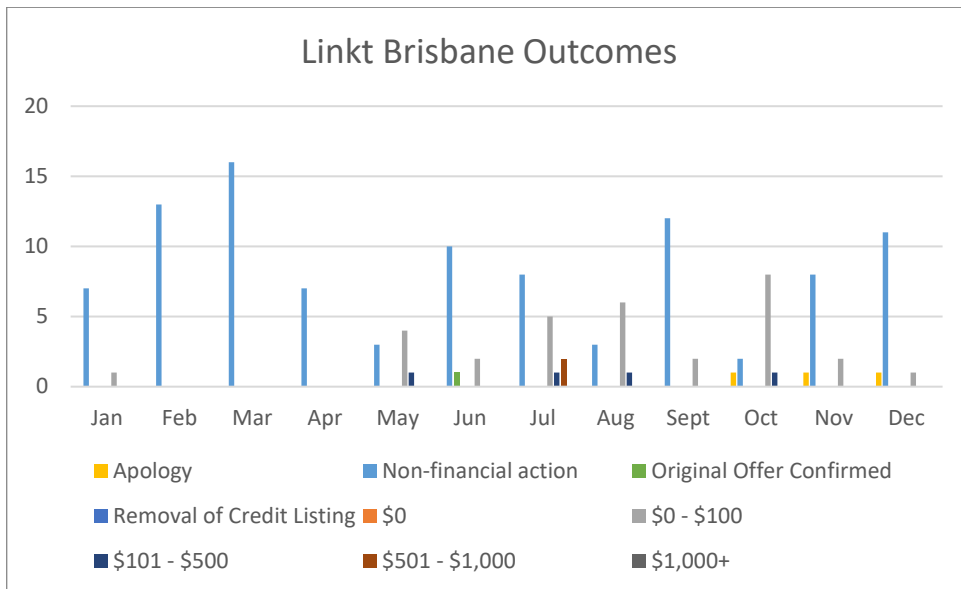


In addition to the increasing complaint numbers, the time taken for the Toll Operator to resolve complaints has been increasing, but not universally:

- 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.
 - Over the last quarter, the timeframes seem to be coming down.
- 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 slight drop off on this metric in October- December.
 - NSW and VIC both had increases in the time taken to resolve in August, but these improved in the October-December quarter.
- Over the reporting period however, there has been a slight reduction in the 31-60 and 90 day categories - indicating an improvement to the overall issue of in timeliness of complaint handling for the last 12 months. The issue of timeliness still needs some work.
- The TCO at his quarterly meetings with Transurban, raised this issue as one that needed to be monitored and addressed.

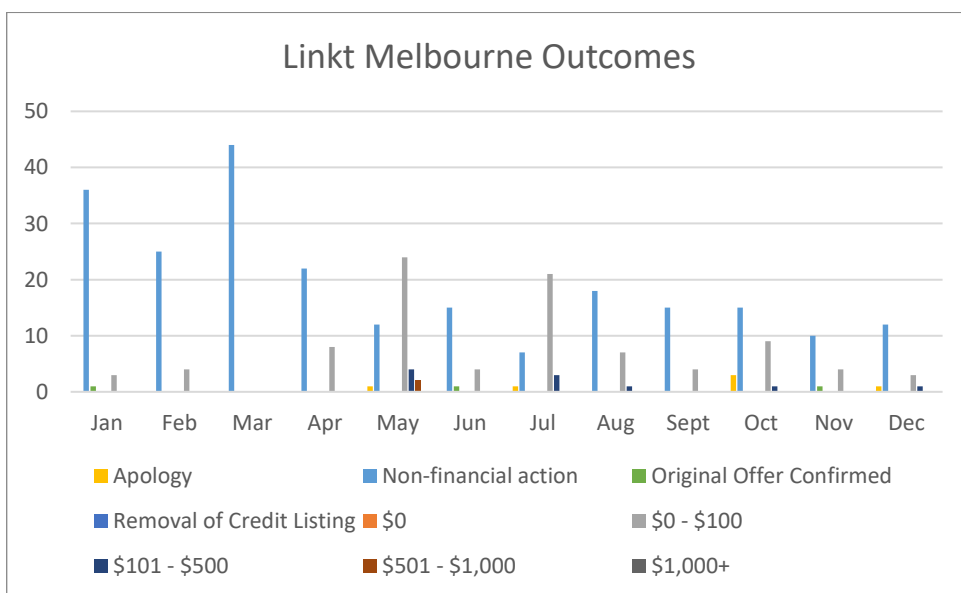
In more positive news, consumer outcomes are improving:

- 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.



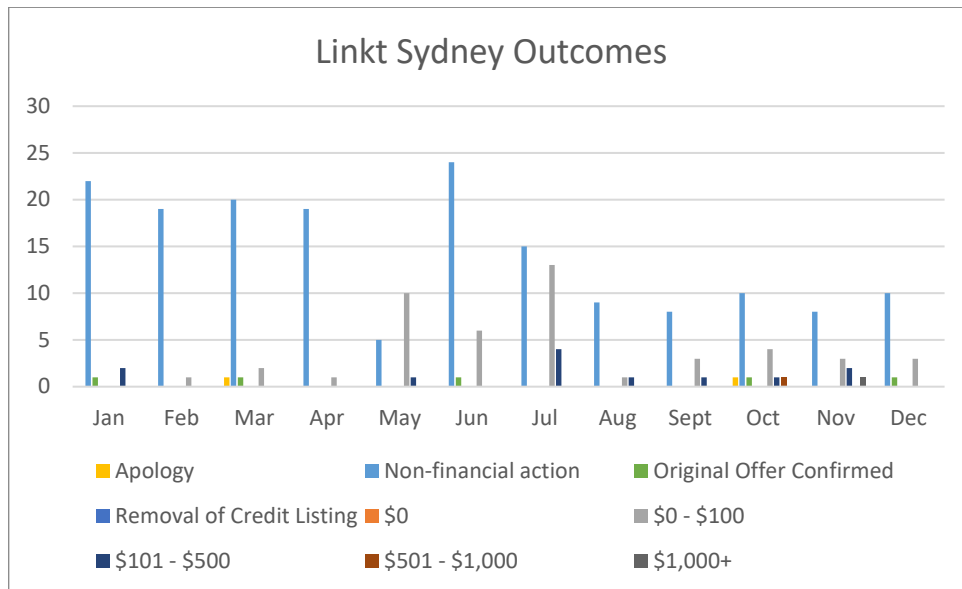
The complaint demographics for QLD (resolved by Linkt Brisbane) remain generally steady:

- 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 overall in complaint numbers over the last four quarters.
- The most recent quarter both the numbers of complaints and outcomes have improved especially compared to January-March 2023 quarter.
- 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 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.
 - 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.
- 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.

APPENDIX 1: RAW DATA 2023

| | | | | | | | | | | | | | |
|---------------------------|-----|-----|-----|-----|-----|-----|-----|-----|------|-----|-----|-----|-----|
| TCO Contact Types | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sept | Oct | Nov | Dec | |
| Phone Calls | 14 | 16 | 16 | 13 | 12 | 15 | 18 | 16 | 15 | 19 | 21 | 22 | |
| 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 | 73 | 62 | 84 | 57 | 67 | 64 | 81 | 47 | 45 | 58 | 40 | 58 | |
| TOTAL | 87 | 78 | 100 | 70 | 79 | 79 | 99 | 63 | 60 | 77 | 61 | 80 | |
| TCO Consumer Locations | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sept | Oct | Nov | Dec | |
| ACT | 0 | 2 | 1 | 0 | 0 | 0 | 0 | 0 | 2 | 0 | 1 | 0 | 6 |
| NSW | 27 | 18 | 21 | 20 | 17 | 31 | 32 | 12 | 9 | 20 | 13 | 13 | 233 |
| NT | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| QLD | 8 | 13 | 17 | 6 | 8 | 13 | 16 | 10 | 15 | 10 | 10 | 16 | 142 |
| SA | 0 | 1 | 1 | 1 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 4 |
| TAS | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 2 |
| VIC | 37 | 28 | 43 | 29 | 42 | 20 | 33 | 25 | 18 | 27 | 15 | 15 | 332 |
| WA | 1 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 3 |
| Outside Australia | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Complaint Numbers | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sept | Oct | Nov | Dec | |
| Linkt Brisbane | 8 | 13 | 16 | 7 | 8 | 13 | 16 | 10 | 14 | 12 | 11 | 13 | 141 |
| Linkt Melbourne | 40 | 29 | 44 | 30 | 43 | 20 | 33 | 26 | 19 | 28 | 15 | 17 | 344 |
| Linkt Sydney | 25 | 20 | 24 | 20 | 16 | 31 | 32 | 11 | 12 | 18 | 14 | 14 | 237 |
| TOTAL | 73 | 62 | 84 | 57 | 67 | 64 | 81 | 47 | 45 | 58 | 40 | 44 | 722 |
| Time Taken to Resolve | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sept | Oct | Nov | Dec | |
| 0-7 days | 1 | 5 | 0 | 7 | 7 | 6 | 14 | 4 | 3 | 16 | 4 | 8 | 75 |
| 8-14 days | 7 | 3 | 5 | 2 | 5 | 2 | 7 | 5 | 4 | 5 | 2 | 2 | 49 |
| 15-30 days | 8 | 4 | 12 | 6 | 14 | 15 | 20 | 8 | 11 | 5 | 8 | 7 | 118 |
| 31-60 days | 0 | 1 | 0 | 13 | 34 | 23 | 25 | 11 | 6 | 12 | 10 | 6 | 141 |
| 61-90 days | 0 | 0 | 0 | 7 | 1 | 18 | 5 | 0 | 1 | 12 | 6 | 21 | 71 |
| 90+ days | 57 | 49 | 67 | 22 | 6 | 0 | 10 | 19 | 20 | 8 | 10 | 0 | 268 |
| TOTAL | 73 | 62 | 84 | 57 | 67 | 64 | 81 | 47 | 45 | 58 | 40 | 44 | 722 |
| 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 | 1 | 1 | 1 | 3 |
| Non-financial action | 7 | 13 | 16 | 7 | 3 | 10 | 8 | 3 | 12 | 2 | 8 | 11 | 100 |
| Original Offer Confirmed | 0 | 0 | 0 | 0 | 0 | 1 | 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 | 1 | 0 | 0 | 0 | 4 | 2 | 5 | 6 | 2 | 8 | 2 | 1 | 31 |
| \$101 - \$500 | 0 | 0 | 0 | 0 | 1 | 0 | 1 | 1 | 0 | 1 | 0 | 0 | 4 |
| \$501 - \$1,000 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 2 |
| \$1,000+ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| TOTAL | 8 | 13 | 16 | 7 | 8 | 13 | 16 | 10 | 14 | 12 | 11 | 13 | 141 |

| Linkt Melbourne Outcomes | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sept | Oct | Nov | Dec | |
|-----------------------------------|-----|-----|-----|-----|-----|-----|-----|-----|------|-----|-----|-----|-----|
| Apology | 0 | 0 | 0 | 0 | 1 | 0 | 1 | 0 | 0 | 3 | 0 | 1 | 6 |
| Non-financial action | 36 | 25 | 44 | 22 | 12 | 15 | 7 | 18 | 15 | 15 | 10 | 12 | 231 |
| Original Offer Confirmed | 1 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 1 | 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 | 3 | 4 | 0 | 8 | 24 | 4 | 21 | 7 | 4 | 9 | 4 | 3 | 91 |
| \$101 - \$500 | 0 | 0 | 0 | 0 | 4 | 0 | 3 | 1 | 0 | 1 | 0 | 1 | 10 |
| \$501 - \$1,000 | 0 | 0 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 |
| \$1,000+ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| TOTAL | 40 | 29 | 44 | 30 | 43 | 20 | 32 | 26 | 19 | 28 | 15 | 17 | 343 |
| Linkt Sydney Outcomes | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sept | Oct | Nov | Dec | |
| Apology | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 2 |
| Non-financial action | 22 | 19 | 20 | 19 | 5 | 24 | 15 | 9 | 8 | 10 | 8 | 10 | 169 |
| Original Offer Confirmed | 1 | 0 | 1 | 0 | 0 | 1 | 0 | 0 | 0 | 1 | 0 | 1 | 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 | 0 | 1 | 2 | 1 | 10 | 6 | 13 | 1 | 3 | 4 | 3 | 3 | 47 |
| \$101 - \$500 | 2 | 0 | 0 | 0 | 1 | 0 | 4 | 1 | 1 | 1 | 2 | 0 | 12 |
| \$501 - \$1,000 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 1 |
| \$1,000+ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 1 |
| TOTAL | 25 | 20 | 24 | 20 | 16 | 31 | 32 | 11 | 12 | 18 | 14 | 14 | 237 |
| Account Management Complaints | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sept | Oct | Nov | Dec | |
| Linkt Brisbane | 7 | 10 | 12 | 6 | 7 | 8 | 14 | 7 | 11 | 7 | 4 | 4 | 97 |
| Linkt Melbourne | 33 | 24 | 32 | 21 | 38 | 15 | 29 | 22 | 14 | 17 | 5 | 10 | 260 |
| Linkt Sydney | 15 | 10 | 18 | 9 | 14 | 19 | 18 | 10 | 7 | 7 | 9 | 5 | 141 |
| TOTAL | 55 | 44 | 62 | 36 | 59 | 42 | 61 | 39 | 32 | 31 | 18 | 19 | 498 |
| Billing / Tolling Complaints | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sept | Oct | Nov | Dec | |
| Linkt Brisbane | 1 | 3 | 4 | 1 | 1 | 5 | 1 | 1 | 3 | 3 | 7 | 8 | 38 |
| Linkt Melbourne | 7 | 4 | 11 | 8 | 4 | 4 | 3 | 4 | 5 | 9 | 9 | 6 | 74 |
| Linkt Sydney | 8 | 7 | 5 | 10 | 2 | 9 | 10 | 1 | 5 | 8 | 2 | 8 | 75 |
| TOTAL | 16 | 14 | 20 | 19 | 7 | 18 | 14 | 6 | 13 | 20 | 18 | 22 | 187 |
| Vehicle Classification Complaints | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sept | Oct | Nov | Dec | |
| Linkt Brisbane | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 0 | 2 | 0 | 0 | 4 |
| Linkt Melbourne | 0 | 1 | 1 | 0 | 0 | 1 | 1 | 0 | 0 | 0 | 1 | 0 | 5 |
| Linkt Sydney | 0 | 3 | 0 | 0 | 0 | 2 | 3 | 0 | 0 | 2 | 3 | 1 | 14 |
| TOTAL | 0 | 4 | 1 | 0 | 0 | 3 | 5 | 1 | 0 | 4 | 4 | 1 | 23 |

| Infrastructure / Signage Traffic Management Complaints | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sept | Oct | Nov | Dec | |
|--|-----|-----|-----|-----|-----|-----|-----|-----|------|-----|-----|-----|---|
| Linkt Brisbane | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 1 |
| Linkt Melbourne | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 1 |
| Linkt Sydney | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| TOTAL | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 1 | 0 | 0 | 2 |

| Average Time To Resolve | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sept | Oct | Nov | Dec | |
|----------------------------|--------|--------|--------|--------|-------|-------|-------|--------|-------|-------|-------|-------|-------------|
| Linkt Brisbane | 172.00 | 137.23 | 118.63 | 107.14 | 35.25 | 34.85 | 32.69 | 26.80 | 70.36 | 51.58 | 59.64 | 55.85 | 902.0052739 |
| Linkt Melbourne | 154.98 | 113.45 | 112.52 | 62.40 | 39.58 | 39.80 | 38.03 | 72.85 | 57.74 | 26.86 | 39.60 | 22.82 | 780.6213697 |
| Linkt Sydney | 138.72 | 143.35 | 86.21 | 81.70 | 44.38 | 48.39 | 52.06 | 114.00 | 88.92 | 66.89 | 63.00 | 55.57 | 983.1799142 |