

# TCO Review

## 1 July to 30 September 2025

**Phillip Davies**

**Tolling Customer Ombudsman**

### ENHANCEMENT OF COMPLAINT RECORDS

Prior to the last 12 months, the TCO generally sought confirmation from claimants, both on the phone and in writing via the complaint form, that they have gone through the Transurban Customer Resolution process before lodging a complaint with the TCO.

This is a standard arrangement throughout all industry-based external dispute resolution (EDR) schemes and ensures scheme participants have a reasonable opportunity to resolve complaints prior to the relevant EDR scheme becoming involved.

The information received from consumers and Transurban has not always been reliable on this point, however.

Where a consumer has come to TCO first, either out of an inability to lodge a complaint with Transurban or obstacles in doing so, the TCO has confirmed with Transurban these preliminary matters must be resolved by Transurban as a matter of urgency.

The TCO has indicated to Transurban that, subject to exceptional circumstances, he would expect this to be done within a 2-week period. Where this is not possible, the complaints should be remitted to the TCO for resolution.

The specific figures in this quarter establish:

Total Complaints originally submitted to TCO by complainants was: 238 in the quarter (205 last quarter).

- Total Complaints originally submitted to TCO by complainants:
  - in July was 76
  - in August was 78
  - in September was 84
- After referrals back to the Transurban Customer Resolutions Team, the TCO had 25 new claims in the quarter which is the same as 25 claims last quarter. Some of these new claims occurred 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 July was 14
  - in August was 7 and
  - in September was 4
- The new claims for the TCO for:
  - New South Wales was 6 complaints in July, 4 complaints in August and 1 complaint in September.
  - Queensland was 2 complaints in July, 3 complaints in August and 1 complaint in September.
  - Victoria was 6 complaints in July, 0 complaints in August and 2 complaints in September
- Transurban sought to resolve directly 68 complaints in July, 2 complaints were referred to E-Toll in July, and 1 complaint was referred to Eastlink.
- Transurban sought to resolve directly 72 complaints in August, 2 complaints were referred to E-Toll.
- Transurban sought to resolve directly 83 complaints in September.

The TCO, in its quarterly discussions with Transurban, will raise the length of time taken by Transurban to resolve issues raised by consumers as some have expressed frustration as to the total time taken to resolve matters. The timeliness of the resolution of the matter is discussed specifically below.

## GENERAL TRENDS

In this quarter, the new claims coming out of Queensland, New South Wales and Victoria are substantially similar to previous quarters in the last 12 months, although the sample size is very small due to Transurban's change of approach internally.

## COMPLAINT RESOLUTION

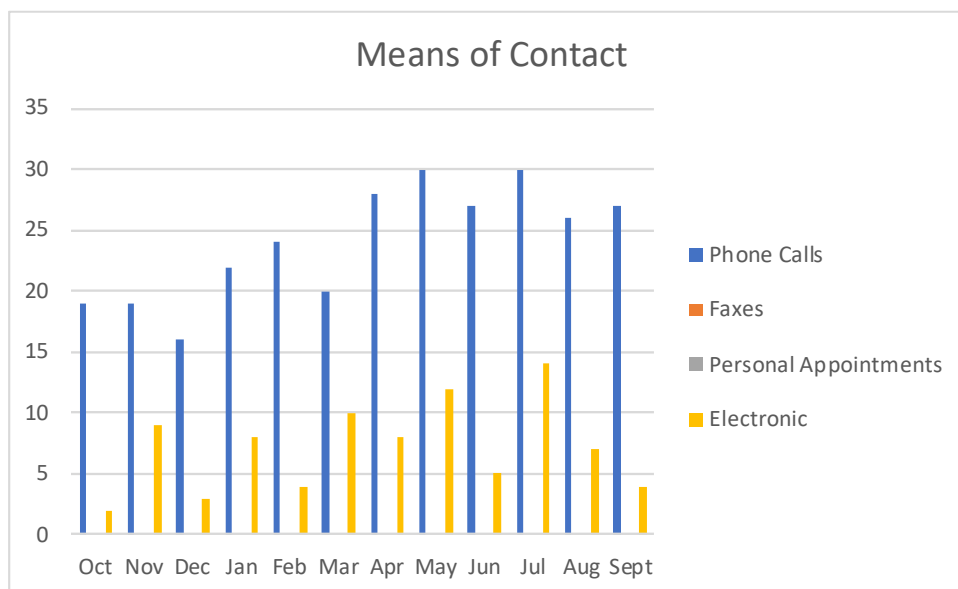
The TCO has a quarterly reporting regime presenting the prior 12 months of statistics on a rolling basis. This report provides data on the last 12 months (building on data already presented), being report 25. The key points relating to this reporting period are:

- 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.
- One concern the TCO has in relation to phone calls is certain debt collectors, acting for Transurban, are including the telephone number of the TCO in their correspondence with Consumers irrespective of whether the matter is outside the TCO jurisdiction (usually the case). The TCO has made representations to Transurban that this practice has to stop as a matter of urgency. There are a number of difficulties with this existing practice:

- Firstly, this undermines the independence of the TCO as it may appear to consumers that TCO has a relationship with the debt collectors when it in fact has no relationship.
- Secondly, it confuses consumers as to what is the appropriate process to go through particularly when the matter is not in the TCO jurisdiction.
- Thirdly, calls by consumers dealing with debt collectors are clogging up the TCO phone system because consumers will generally prefer to call and talk to the TCO rather than debt collectors even if the matter is not yet in TCO's jurisdiction (generally the case).
- 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
  - The activities of debt collectors contracted by Transurban. In particular the need for additional focus on the correspondence of debt collectors to consumers which is presently confusing the consumers as to the appropriate processes for resolution of matters rather than clarifying them (see above). This needs to be addressed by Transurban as a matter of urgency. One practice, for example, that the TCO has told Transurban is unacceptable is that the debt collectors provide consumers with the TCO telephone number before the matter is even in the TCO jurisdiction. Thus, confusing consumers as to the relationship between TCO and the debt collector but also the appropriate procedures for resolution of disputes.

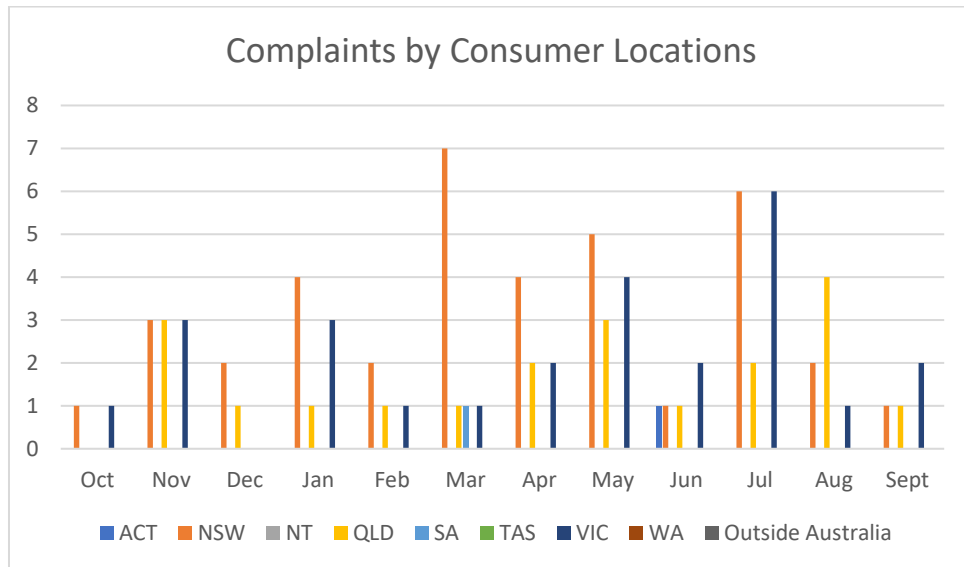
The time that it is still taking Transurban to resolve matters both within and prior to the jurisdiction of the TCO (see above).

## 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.



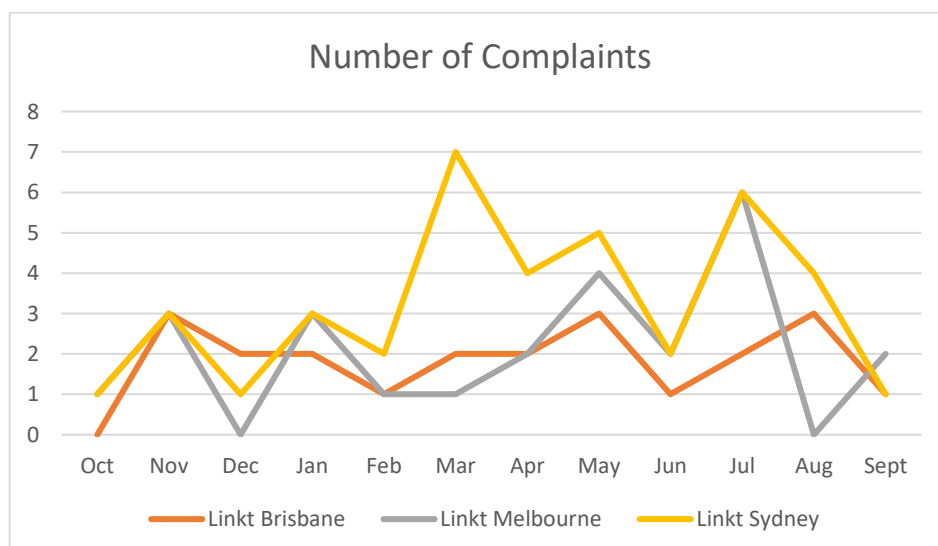
## COMPLAINT INFORMATION

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

In the most recent 12-month period, 78 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. 45.5% (39 complaints out of 86).
- Queensland consumers generally represent just over 20% of complaints and for the last 12 months it is 25.5% (22 complaints out of 86).
- This is less than for the last year being 30% of total claims in Queensland. As discussed in the last report there was a spike of claims in Queensland in the April-June quarter in 2024 but the numbers in the subsequent quarters were substantially lower.
- Victoria generally represents approximately 30% of complaints. The rate for the last 12 months is 29% (25 complaints out of 86).

## NUMBER OF COMPLAINTS IN THE LAST 12 MONTHS



## LONGER TERM TRENDS IDENTIFIED

Overall, some longer-term trends can be identified:

The TCO notes Transurban'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 details in respect to time taken on disputes is set out in greater detail below.

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 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 quick. 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. It would be helpful for Transurban to consider what improvements could be made to this process to overcome this difficulty and discuss with the TCO these improvements to the process.

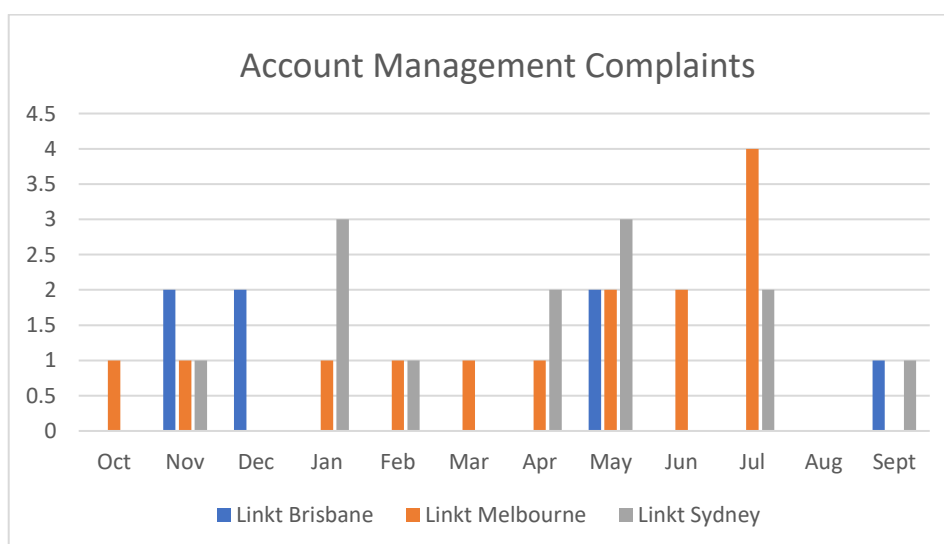
In this context, adding to the confusion is the issue raised earlier in the report that certain debt collectors are in their correspondence with Consumers including the telephone number of the TCO in that correspondence irrespective of whether the matter is in the TCO jurisdiction or not (usually the case). The TCO has made representations to Linkt that this practice has to stop and Linkt must ensure that this happens as a matter of urgency.

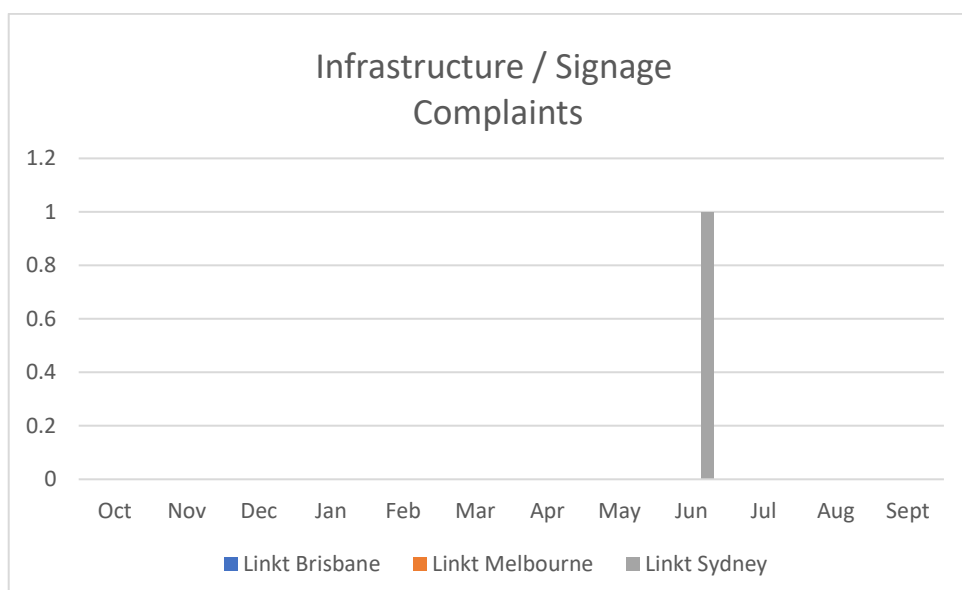
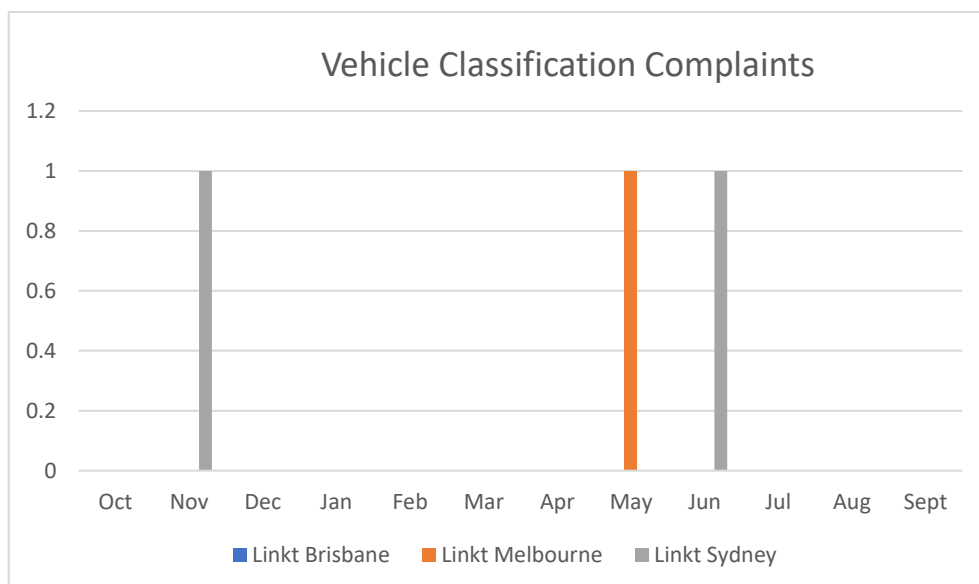
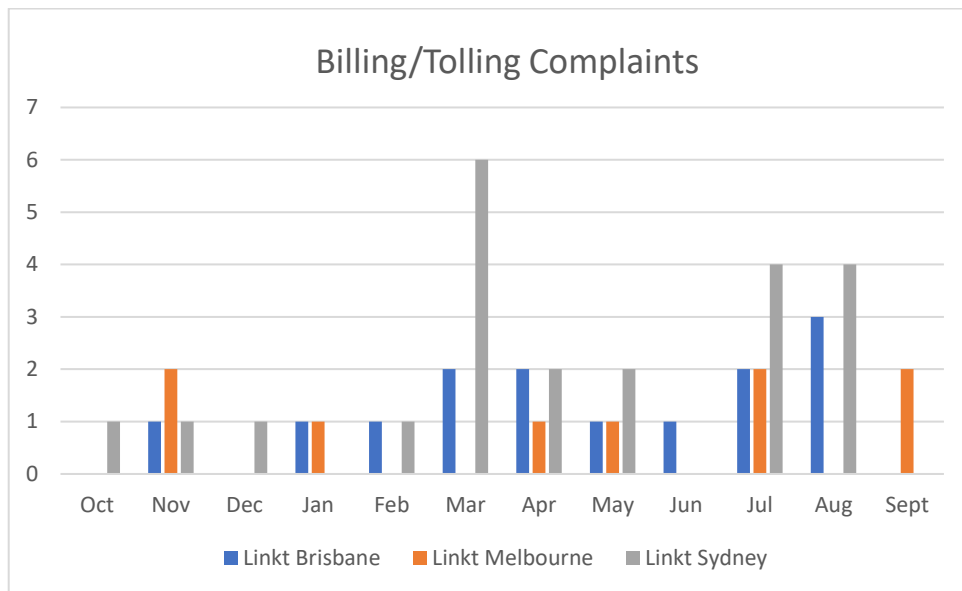
The nature of the complaints remains essentially the same. The main issues in the last year relate to Accounts Management and Billing/Tolling.

- 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.

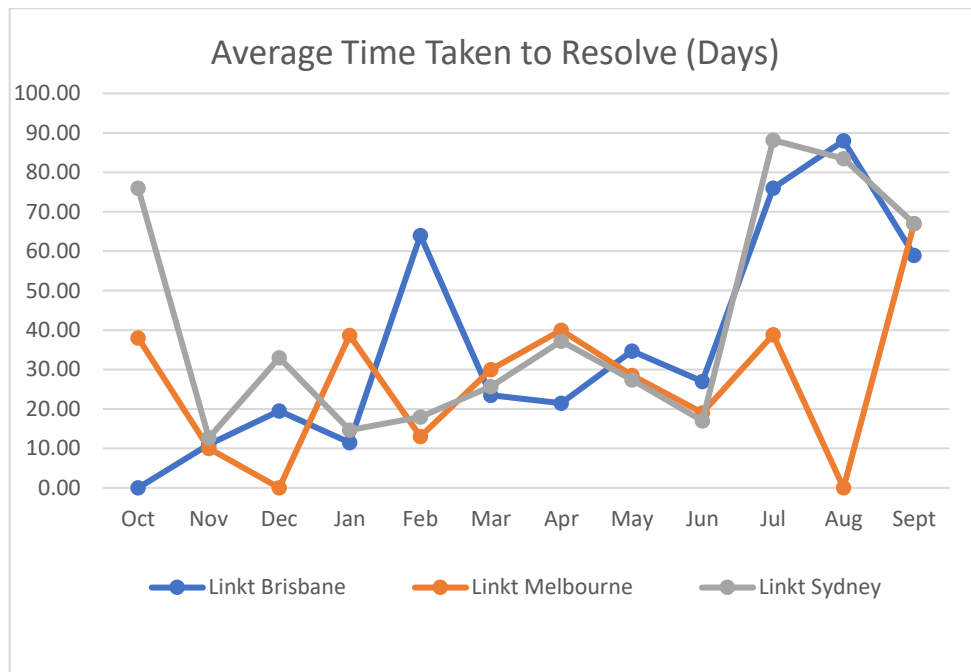
The TCO will continue to monitor developments in this area.

## 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. This issue continues to be raised with Transurban and the TCO is actively seeking solutions from Transurban to resolve the issue for consumers.

- In short, whilst there are fewer complaints being made it seems from the data; each complaint is taking longer to resolve over the last 12 months.
- In the most recent quarter, there is a significant increase in the time taken to resolve complaints and in particular the percentage of claims that have taken more than 90 days. There was also a significant spike in relation to these claims in the period of December 2024 to March 2025. The increase is particularly pronounced in all jurisdictions for this quarter
  - This issue will need to be monitored closely in the next few quarters by the TCO.
  - The TCO will place greater emphasis and focus on this issue in his quarterly meetings with Transurban going forward to ascertain what the reasons are for the increase in time of resolving disputes.

## PRELIMINARY ASSESSMENT OF REFINEMENTS ON THE TIME TAKEN TO RESOLVE COMPLAINTS

- Over the 12-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 (see discussion above). 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.
- The wider context also is that TCO in the most recent determinations has made observations about the timeliness of Transurban responses both before a matter comes into the TCO jurisdiction and once a dispute comes into the jurisdiction of the TCO.
- 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.

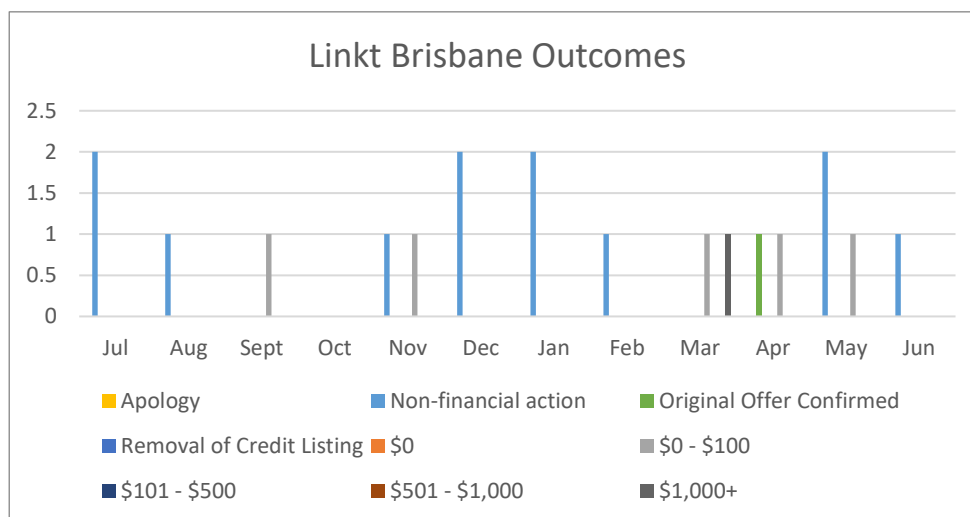
## GENERAL OBSERVATIONS ON RESOLUTION AND DEBT LEVELS

A couple of observations are as follows:

In most disputes consumers are particularly concerned with the quantum of administration fees. Transurban as part of its resolution of long-standing disputes sometimes waives all or some of the administration fees. In this quarter, there were 13 separate instances where Transurban waived part or all of the administration fees in order to settle the dispute.

- 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

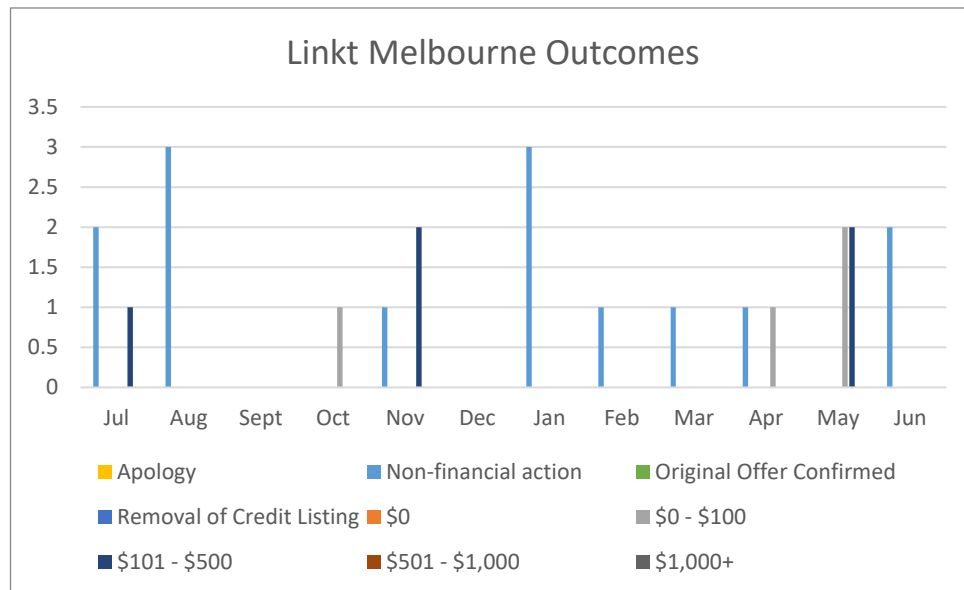


Subject to the refined process and confirmation of the longer-term impact of these arrangements the complaint demographics for Queensland (resolved by Linkt Brisbane) remain generally steady:

- The number of complaints has been stable for the last 12 months after there was a spike in claims in the April-June quarter in 2024.
- The outcomes for disputes continue to be broadly consistent for the 12-month period.



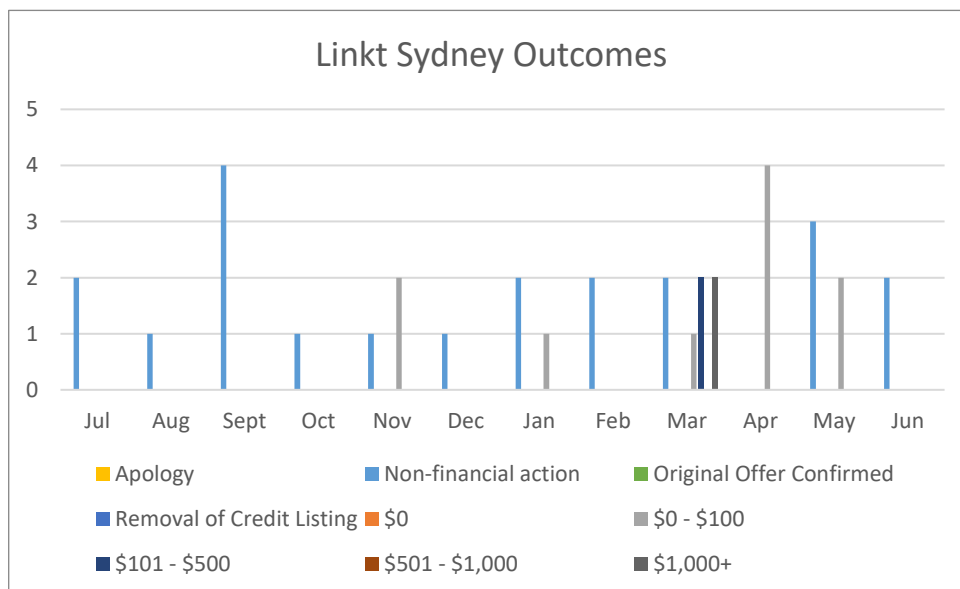
## LINKT MELBOURNE OUTCOMES



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 12 months confirming that the issues previously prevalent 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 last 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 four 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. Once again, the TCO has raised in this Report the need for Linkt to carefully review what debt collectors are sending to their consumers in respect to disputes so that the communication is clear and does not mislead or confuse.

- 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, Transurban does need in the medium and longer term to resolve these issues as these issues are continuing to result in significant consumer concern.
- As stated above, the issue of timeliness of resolution of claims is a real concern to the TCO at the moment. Whilst the number of complaints is down under the new system the timing of resolution of the complaints has increased significantly and has been the subject of adverse discussion in the last two most recent determinations by the TCO.
- In the quarterly meetings with Transurban the TCO continues to raise these issues with Transurban as a consumer concern.

## APPENDIX 1: RAW DATA 2024 – 2025

TCO Contact Types	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
Phone Calls	19	19	16	22	24	20	28	30	27	30	26	27	
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	2	9	3	8	4	10	8	12	5	14	7	4	
TOTAL	21	28	19	30	28	30	36	42	32	44	33	31	
TCO Consumer Locations	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
ACT	0	0	0	0	0	0	0	0	1	0	0	0	1
NSW	1	3	2	4	2	7	4	5	1	6	2	1	38
NT	0	0	0	0	0	0	0	0	0	0	0	0	0
QLD	0	3	1	1	1	1	2	3	1	2	4	1	20
SA	0	0	0	0	0	1	0	0	0	0	0	0	1
TAS	0	0	0	0	0	0	0	0	0	0	0	0	0
VIC	1	3	0	3	1	1	2	4	2	6	1	2	26
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
Complaint Numbers	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
Linkt Brisbane	0	3	2	2	1	2	2	3	1	2	3	1	22
Linkt Melbourne	1	3	0	3	1	1	2	4	2	6	0	2	25
Linkt Sydney	1	3	1	3	2	7	4	5	2	6	4	1	39
TOTAL	2	9	3	8	4	10	8	12	5	14	7	4	86
Time Taken to Resolve	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
0-7 days	0	3	0	2	1	1	1	2	0	0	0	0	10
8-14 days	0	4	0	1	1	0	0	0	1	0	0	0	7
15-30 days	0	2	2	3	0	9	1	4	4	5	0	0	30
31-60 days	1	0	1	2	1	1	5	6	0	3	1	1	22
61-90 days	1	0	0	0	1	0	0	0	0	1	1	3	7
90+ days	0	0	0	0	0	0	0	0	0	5	5	0	10
TOTAL	2	9	3	8	4	11	7	12	5	14	7	4	86
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	0	1	2	2	1	0	0	2	1	1	0	0	10
Original Offer Confirmed	0	0	0	0	0	0	1	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	0	1	0	0	0	1	1	1	0	0	1	0	5
\$101 - \$500	0	0	0	0	0	0	0	0	0	0	0	0	0
\$501 - \$1,000	0	0	0	0	0	0	0	0	0	0	0	0	0
\$1,000+	0	0	0	0	0	1	0	0	0	0	0	0	1
TOTAL	0	2	2	2	1	2	2	3	1	1	1	0	17
Linkt Melbourne 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	0	1	0	3	1	1	1	0	2	1	0	0	10
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	1	0	0	0	0	0	1	2	0	4	0	0	8
\$101 - \$500	0	2	0	0	0	0	0	2	0	0	0	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	1	0	0	1
<b>TOTAL</b>	1	3	0	3	1	1	2	4	2	6	0	0	23

<b>Linkt Sydney Outcomes</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>	<b>Jan</b>	<b>Feb</b>	<b>Mar</b>	<b>Apr</b>	<b>May</b>	<b>Jun</b>	<b>Jul</b>	<b>Aug</b>	<b>Sept</b>	
Apology	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-financial action	1	1	1	2	2	2	0	3	2	0	0	0	14
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	0	2	0	1	0	1	4	2	0	0	1	0	11
\$101 - \$500	0	0	0	0	0	2	0	0	0	0	0	0	2
\$501 - \$1,000	0	0	0	0	0	0	0	0	0	0	0	0	0
\$1,000+	0	0	0	0	0	2	0	0	0	2	0	0	4
<b>TOTAL</b>	1	3	1	3	2	7	4	5	2	2	1	0	31

<b>Account Management Complaints</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>	<b>Jan</b>	<b>Feb</b>	<b>Mar</b>	<b>Apr</b>	<b>May</b>	<b>Jun</b>	<b>Jul</b>	<b>Aug</b>	<b>Sept</b>	
Linkt Brisbane	0	2	2	0	0	0	0	2	0	0	0	1	7
Linkt Melbourne	1	1	0	1	1	1	1	2	2	4	0	0	14
Linkt Sydney	0	1	0	3	1	0	2	3	0	2	0	1	13
<b>TOTAL</b>	1	4	2	4	2	1	3	7	2	6	0	2	34

<b>Billing / Tolling Complaints</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>	<b>Jan</b>	<b>Feb</b>	<b>Mar</b>	<b>Apr</b>	<b>May</b>	<b>Jun</b>	<b>Jul</b>	<b>Aug</b>	<b>Sept</b>	
Linkt Brisbane	0	1	0	1	1	2	2	1	1	2	3	0	14
Linkt Melbourne	0	2	0	1	0	0	1	1	0	2	0	2	9
Linkt Sydney	1	1	1	0	1	6	2	2	0	4	4	0	22
<b>TOTAL</b>	1	4	1	2	2	8	5	4	1	8	7	2	45

<b>Vehicle Classification Complaints</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>	<b>Jan</b>	<b>Feb</b>	<b>Mar</b>	<b>Apr</b>	<b>May</b>	<b>Jun</b>	<b>Jul</b>	<b>Aug</b>	<b>Sept</b>	
Linkt Brisbane	0	0	0	0	0	0	0	0	0	0	0	0	0
Linkt Melbourne	0	0	0	0	0	0	0	1	0	0	0	0	1
Linkt Sydney	0	1	0	0	0	0	0	0	1	0	0	0	2
<b>TOTAL</b>	0	1	0	0	0	0	0	1	1	0	0	0	3

<b>Infrastructure / Signage Traffic Management Complaints</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>	<b>Jan</b>	<b>Feb</b>	<b>Mar</b>	<b>Apr</b>	<b>May</b>	<b>Jun</b>	<b>Jul</b>	<b>Aug</b>	<b>Sept</b>	
Linkt Brisbane	0	0	0	0	0	0	0	0	0	0	0	0	0
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	1	0	0	0	1
<b>TOTAL</b>	0	0	0	0	0	0	0	0	1	0	0	0	1

Average Time To Resolve	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	
Linkt Brisbane	0.00	11.00	19.50	11.50	64.00	23.50	21.50	34.67	27.00	76.00	88.00	59.00	212.6667
Linkt Melbourne	38.00	10.00	0.00	38.67	13.00	30.00	40.00	28.50	19.00	38.83	0.00	67.00	217.1667
Linkt Sydney	76.00	12.67	33.00	14.67	18.00	25.71	37.25	27.40	17.00	88.17	83.50	67.00	261.6976