Tolling Customer Ombudsman

TCO Review
1 April to 30 June 2026

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Tolling Customer Ombudsman

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EXECUTIVE SUMMARY

The June 2026 Quarter has been a time of notable change in the complaint management process for the Tolling Customer Ombudsman (TCO) office. Changes have included:

- Implementation of a new customer-centric complaints process based on Australian Standard 10002:2022[1] and best practice process[2].
- Improved analysis of both TCO and Transurban (TU) performance

New TCO complaints process.

A new process of managing complaints was implemented by TCO, in agreement with TU, on 17 April 2026 (the TCO Process). This change was made to:

- Improve customer response times.
- Better meet customer expectations that a complaint to an ombudsman is addressed with full input from that ombudsman and not handled primarily by the entity to which the complaint relates.
- Increase TCO involvement in customer interaction and negotiation.
- Tighten focus on TU performance.
- Improve performance reporting.
- Comply with Australian Standards and current best practice.

Despite TU implementing the TCO process on 17 April 2026, the TCO was advised by TU on 5 May 2026 that they would not continue with the TCO process. This is despite the TCO process reverting its approach to classification of complaints to that used prior to the June 2024 quarter. The then TU preferred approach, agreed to by the TCO at the time, was intended to encourage TU to resolve customer complaints earlier and more efficiently. While this occurred for a while, it appears to have been deteriorated over the past year, requiring the TCO to intervene.

The TCO is concerned TU's preferred process has not only resulted in poorer customer service but does not enable either TU or the TCO to apply best practice complaint handling principles.

Consequently, the TCO requested TU to reconsider. From 3 June 2026, TU advised that the TCO was no longer to use the new process with the SME and that all complaints would go to their general customer resolutions team email and be classified as 'enquiry' or 'complaint' based on TU's definition of those terms. Under this process, only 'complaints" (as defined by TU) should be accepted by the TCO (the TU process). This position is still in effect as of 30 June 2026.

From this date, except for one complaint, TU did not recognise TCO raised complaints and advised that they would handle complaints directly with the customers. At the end of the quarter, TU advised that it only recognised 13 of 106 matters raised by the TCO for the quarter.

The TCO disagrees with this response.

The TCO continues to raise complaints in accordance with the new process but is significantly hampered in the resolution process post 3 June 2026.

As an independent organisation, the TCO cannot access TU systems and relies on TU cooperation to access evidence, data, and direct customer interactions. Without this, the TCO is unable to effectively determine reasons for why a case has arisen or whether the result is fair and equitable.

For those cases that TU do not recognise as "official TCO cases," TU are now only providing notification of a case's date of resolution with little evidence or details of any agreements or customer responses. The TCO has followed up directly with customers, and often, customers have advised no resolution has been provided.

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[1] *AS 10002:2022 Guidelines for complaint handling in organisations*

[2] *NSW Ombudsman, Effective Complaint Management, 4th Edition, November 2024*

This leads to uncertainty about the accuracy of the data being received by TCO from TU. It is noted that full responses are provided for those TCO cases that TU does recognise as a complaint.

In this context, the TCO continue to seek TU's cooperation with the TCO process and is encouraged by TU's public statements about making its operations simpler and fairer for its customers and exploring a range of practical and implementable solution to assist those who use its services.

Complaint Handling Statistics

The following table provides a summary of complaint handling statistics for the current quarter:

Date	Total Cases	TCO Cases Raised	TU handled cases	Resolved within 21 days	Resolved within 45 days	Outstanding for more than 45 days	Total outstanding
1/4/26-16/4/26	22	7	15	4	4	14	14
17/4/26-30/4/26	35	35	0	18	11	6	6
1/5/26-31/5/26	39	39	0	18	14	7	7
1/6/26-3/6/26	3	3	0	2			1
4/6/26-9/6/26	2	2	0	1			1
10/6/26-30/6/26-	20	20	0	n/a			20
Total	**121**	**106**	**15**	**43**	**29**	**27**	**49**

Blue highlighted rows show the cases managed under TCO new process.

Of 121 complaints raised during the period, the TCO raised 106 cases compared to 11 cases raised in the March 2026 Quarter. In the previous report, 105 complaints were received but all were to be handled directly by TU, with the 11 TCO raised cases relating to prior periods.

Of complaints raised in the June 2026 Quarter:

- 35% of complaints were resolved within 21 days.
- 59% of complaints were resolved within 45 days.
- 22% of complaints remained outstanding for more than 45 days.
- 64% of all complaints for the period were undertaken under the new process with both TCO and TU in full cooperation.

It is noted that as of 30 June 2026, TU only recognise 13 cases as being official TCO cases. Revisions in TU recognition of TCO raised cases for the quarter were provided to the TCO from late June to early July 2026.

Systemic Issues

Systemic issues identified in the complaint handling process with TU remain consistent with previous reports, namely:

- Misreads of number plates resulting in incorrect charges (23% of all complaints).
- Debt collection issues ranging from not suspending collection activity whilst complaint under investigation to little warning of debt collection activity to customers (17% of all complaints).
- Inconsistencies and poor communication in account activations/suspensions including double charging between accounts and passes and incorrect backdating of travel charges to account (13% of all complaints).
- Incorrect, inconsistent, or insufficient information provided by TU in response to customer complaints, particularly through call centre (11% of all complaints).
- Incorrect charging or lack of clarity regarding toll charging post transfer of registration on sale of vehicle or removal of tags (11% of all complaints).
- More generally:
    - Complaints as to rudeness, response times, unsatisfactory responses, inconsistent responses, and timing out of calls to call centre.
    - Excessive administration and video fees.

Conclusion

The TCO will continue to actively raise TCO complaints in accordance with best practice and maintain the independence of the office of the Ombudsman. It will continue to seek effective communication with TU and continue reporting both to individual customers on their cases and publicly on systemic issues as they arise. These actions are in full compliance with the TCO Scheme Terms of Reference.

Note: Post 30 June 2026, TU has expressed a commitment to work collaboratively to resolve the issues the TCO has raised in this Report.

1. NEW COMPLAINT PROCESS

1.1 Previous complaint handling process

Prior to 17 April 2026, the TCO would seek 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. (refer TOR Part B sections 7 and 8)[3].

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.

Since 2024, where a consumer has come to the TCO first, either out of an inability to lodge a complaint with Transurban or obstacles in doing so, the TCO confirms with Transurban these preliminary matters and Transurban must resolve these matters urgently. As part of this process, the TCO informs the customer that the Transurban Customer Resolution Team will be seeking to resolve the matter directly with the customer first but within an abbreviated time frame.

The TCO had indicated to Transurban that, subject to exceptional circumstances, the matter should be resolved within a 2-week period (refer AS20001:2022)[4]. TCO TOR Part B, Section 8[5], however, provides a 45-day timeframe for resolution. Where resolution by Transurban is not possible, the complaints should then revert to the TCO for resolution. In many cases, these timeframes were not met.

Based on assessment of previous performance, the TCO requested a workshop with Transurban (TU). Its objective was to refine processes to improve complaint handling with a view to:

- Improving efficiency in process in terms of number of times correspondence is required.
- Reducing time taken for complaint resolution.

A NSW Tollway Ombudsman representative observed the process, further enabling more consistency between processes between NSW and the TCO jurisdictions.

It should be noted that the TCO TOR sets a 21-day time frame to update the customer and notes that most matters should be resolved within 45 days (TOR Part C, section 25 and 26)[6].

1.2 New Process

The TCO process was developed based on AS 10002:2022[7] and best practice publications[8] from other Australian Ombudsman offices. It commenced with TU on 17 April 2026.

The major changes were:

- All complaints within jurisdiction and with evidence of prior contact with TU, were raised immediately as a TCO dispute (this reduces the step of checking with TU if a complaint has previously been made).
- The TCO would assess each complaint and forward to a nominated TU subject matter expert (SME) with requests for evidence and a potential resolution strategy.

3 *TCO Tolling Customer Ombudsman Terms of Reference*
4 *AS 10002:2022 Guidelines for complaint handling in organisations*
5 *TCO Tolling Customer Ombudsman Terms of Reference*
6 *Ibid*
7 *AS 10002:2022 Guidelines for complaint handling in organisations*
8 *NSW Ombudsman, Effective Complaint Management, 4th Edition, November 2024*

- On receipt of response from TU, if it was acceptable to the TCO, the TCO would contact the customer to seek agreement.
- If the matter was complex or needed further consideration, the TCO would work together with TU's SME to develop a solution.

1.3 TU Response

The TCO was advised by TU on 5 May that they would not continue with the TCO process. This is despite the new TCO process reverting its approach to classification of complaints to that used prior to the June 2024 quarter. The TU preferred approach, agreed to by the TCO at the time, was intended to encourage TU to resolve customer complaints earlier and more efficiently. While this occurred for a while, it appears to have deteriorated over the past year, requiring the TCO to intervene.

The TCO was concerned that reversion to the TU preferred process would result in:

- Reduced timeliness of responses leading to poorer customer satisfaction (with matters involving debt collection and infringement notices, the timeliness of resolution is critical).
- The TCO being unable to apply best practice complaint handling principles and meet performance requirements set in its Terms of Reference.
- Independence of the Office of the Ombudsman being compromised. Issues of jurisdiction and affording TU an opportunity to resolve the matter directly, are determined by the Ombudsman under the TCO Scheme Terms of Reference.

Consequently, the TCO requested TU to reconsider its position. From 3 June 2026, TU advised that the TCO was no longer to use the TCO process including:

- No contact with the SME or a specified escalation path
- All complaints would go to their general customer resolutions team email.
- Cases would be classified as 'enquiry' or 'complaint' based on TU's definition of those terms.

Under the TU process, only 'complaints' (as defined by TU) should be accepted by the TCO.

1.4 Current Position

From this date, except for one complaint, TU did not recognise TCO officially raised complaints and advised that they would handle complaints directly with the customers. At the end of the quarter, TU backdated acceptance of TCO raised complaints and only recognised 13 of 106 matters raised by the TCO.

It should be noted that the TCO TOR Part B section 17 states that "Eligibility of an Applicant and the jurisdiction of the TCO, will be determined by the TCO at its sole discretion, subject to a party's right to request a review of the decision under clause 18".

The TCO continues to raise complaints in accordance with the TCO process but is significantly hampered in the resolution process post 3 June 2026.

As an independent organisation, the TCO cannot access TU systems and relies on TU cooperation to access evidence and data. Without this, the TCO is unable to effectively determine reasons causing the complaint or whether the resulting solution is fair and equitable.

For those cases that TU do not recognise as "official TCO cases," TU are now only providing notification of a case's date of resolution with little evidence or details of any agreements or customer responses. The TCO has followed up directly with customers, and often, customers have advised no resolution has been provided. This leads to uncertainty about the accuracy of the data being received by the TCO from TU. It is noted that full responses are provided for those TCO cases that TU does recognise as a complaint.

Additionally, it appears, TU are closing matters after 3 failed attempts to contact the customer and as a result requesting the TCO to advise customer to contact them. In most instances, when a customer raises a complaint with the TCO, they do not wish to deal with TU but with the TCO. This is often due to either poor communication with TU or time wasted trying to get resolution through contacting TU directly.

Also, it is noted that the TCO, generally, does not have difficulty in contacting the customer either by email or phone.

The TCO notes that Transurban has a reform project that intends to implement improvements in several areas. This is targeting a review of process, and where necessary, implementing changes to the following processes by the end of this financial year:

- Increased resourcing of complaint handling staff
- Accessibility
- Debt collection.

Further work is to be undertaken by TU on the following, to be rolled out in the next financial year:

- Hardship cases
- Digital chats
- File sharing
- Reporting of complaint handling
- Case management

In this context, the TCO continue to seek TU's cooperation with the TCO process and is encouraged by TU's public statements about making its operations simpler and fairer for its customers and exploring a range of practical and implementable solution to assist those who use its services.

2 TCO COMPLAINTS STATISTICS

2.1 June 2026 Quarter Data

The below table provides data for the June 2026 Quarter:

Date	Total Cases	TCO Cases Raised	TU handled cases	Resolved within 21 days	Resolved within 45 days	Outstanding for more than 45 days	Total outstanding
1/4/26-16/4/26	22	7	15	4	4	14	14
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4/6/26-9/6/26	2	2	0	1			1
10/6/26-30/6/26-	20	20	0	n/a			20
Total	**121**	**106**	**15**	**43**	**29**	**27**	**49**

Blue highlighted rows show the cases managed under TCO new process.

The area highlighted in blue shows the period for which the new process was in full operation. This process resulted in:

Of 121 complaints raised during the period, the TCO raised 106 cases compared to 11 cases raised in the March 2026 Quarter. In the previous report, 105 complaints were received but all were to be handled directly by TU. The 11 cases raised in the March 2026 Quarter by the TCO related to prior periods.

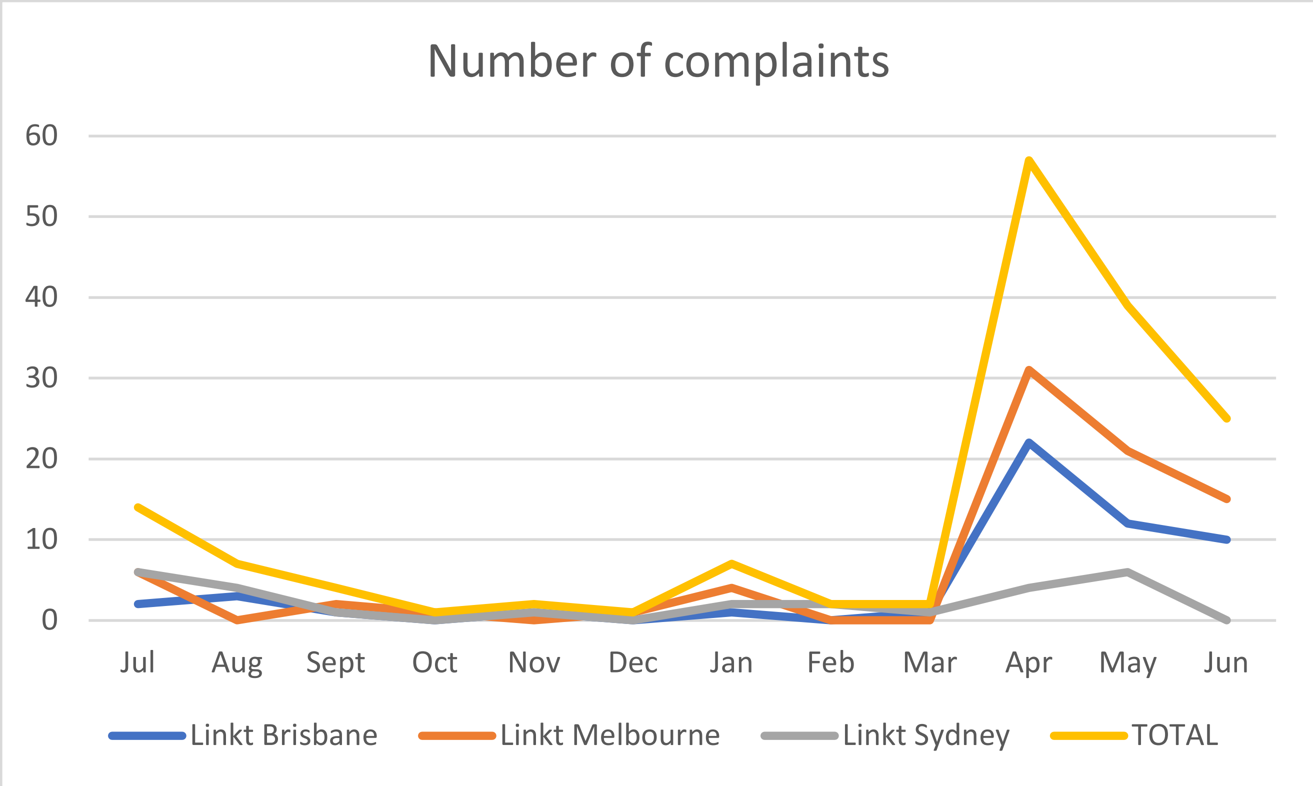
Of complaints raised in the June 2026 Quarter:

- 35% of complaints were resolved within 21 days.
- 59% of complaints were resolved within 45 days.
- 22% of complaints remained outstanding for more than 45 days.
- 64% of all complaints for the period were undertaken under the new process with both TCO and TU in full cooperation.

It is noted that at 30 June 2026, TU only recognises 13 cases as being official TCO cases. Revisions in TU recognition of TCO raised cases were provided to the TCO from late June to early July 2026.

2.2 Number of complaints

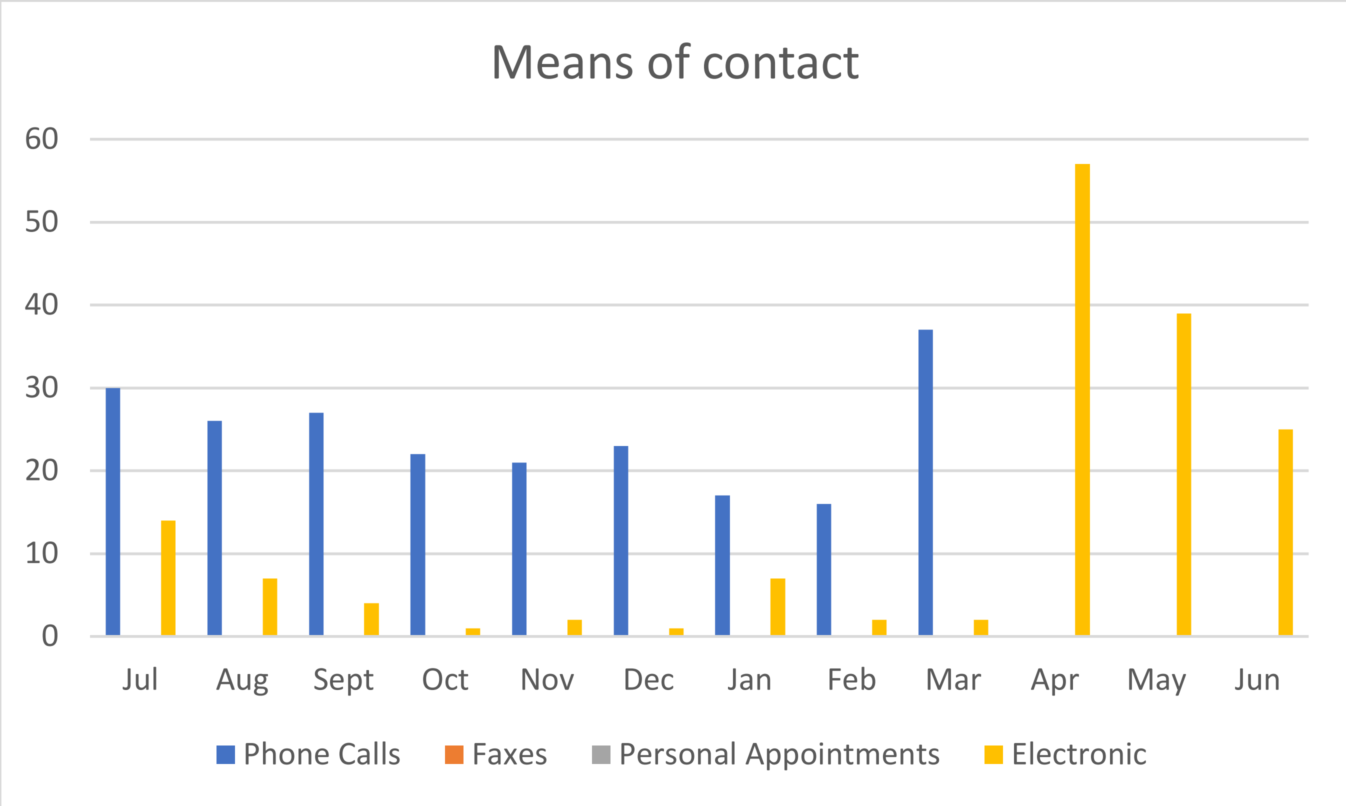
The following graph shows the annual trend in TCO complaints:



This graph must be interpreted through the lens that:

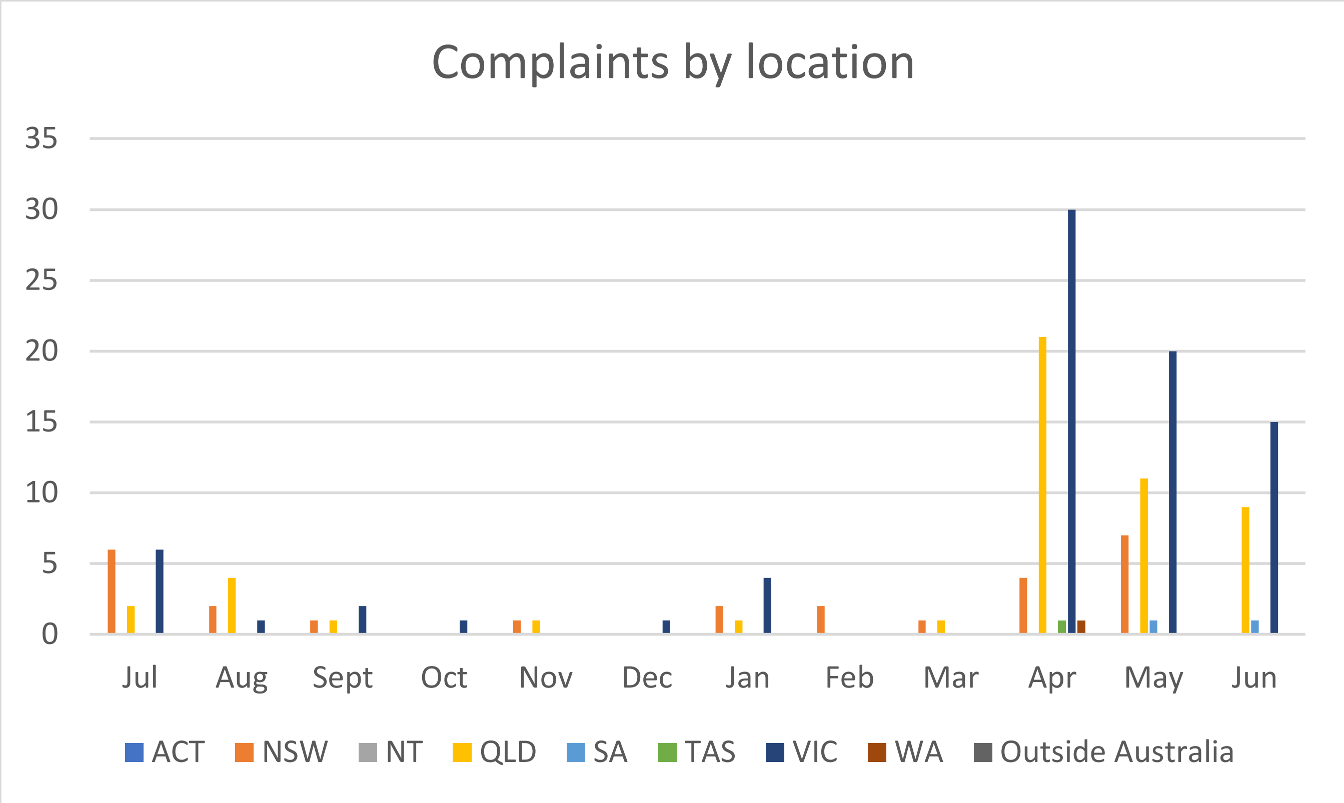
- The TCO has changed the measurement process as of 17 April 2026.
- NSW complaints were officially transferred to NTOL in March 2026. At the date of this report, only 10 NSW matters remain on foot.

2.3 Means of Contact with Ombudsman



- Since April 2026, the predominant means of contacting the TCO with a complaint is through electronic means.
- One concern in terms of contact is that debt collectors, acting for TU, are including the telephone number and email of the TCO in their correspondence with customers. There are several difficulties with this existing practice:
  - Firstly, it undermines the independence of the TCO, as it may appear to customers that TCO has a relationship with the debt collectors when it in fact has no relationship.
  - Secondly, it confuses customers as to what is the appropriate process to go through for resolution of their matter, particularly when the matter is not in the TCO jurisdiction. One practice, for example, is that the debt collectors provide customers with the TCO telephone number before the matter is even in the TCO jurisdiction. Thus, not only confusing customers as to the relationship between the TCO and the debt collector but also the appropriate procedures for resolution of disputes.
  - Thirdly, calls by customers dealing with debt collectors are clogging up the TCO phone system because customers will prefer to call and talk to the TCO rather than debt collectors, even if the matter is not yet in the TCO's jurisdiction. The TCO has made representations to TU that this practice must stop as a matter of urgency. TU agreed in writing on 28 April 2026 to have the contact details removed, however at the date of this report, TCO contact details remain on debt collector correspondence with customers.

2.4 Complaints by Location



During the quarter, the TCO operated across toll roads in two states in Australia –Queensland, and Victoria, but was available for all customers of those toll roads regardless of the customer's location of residence.

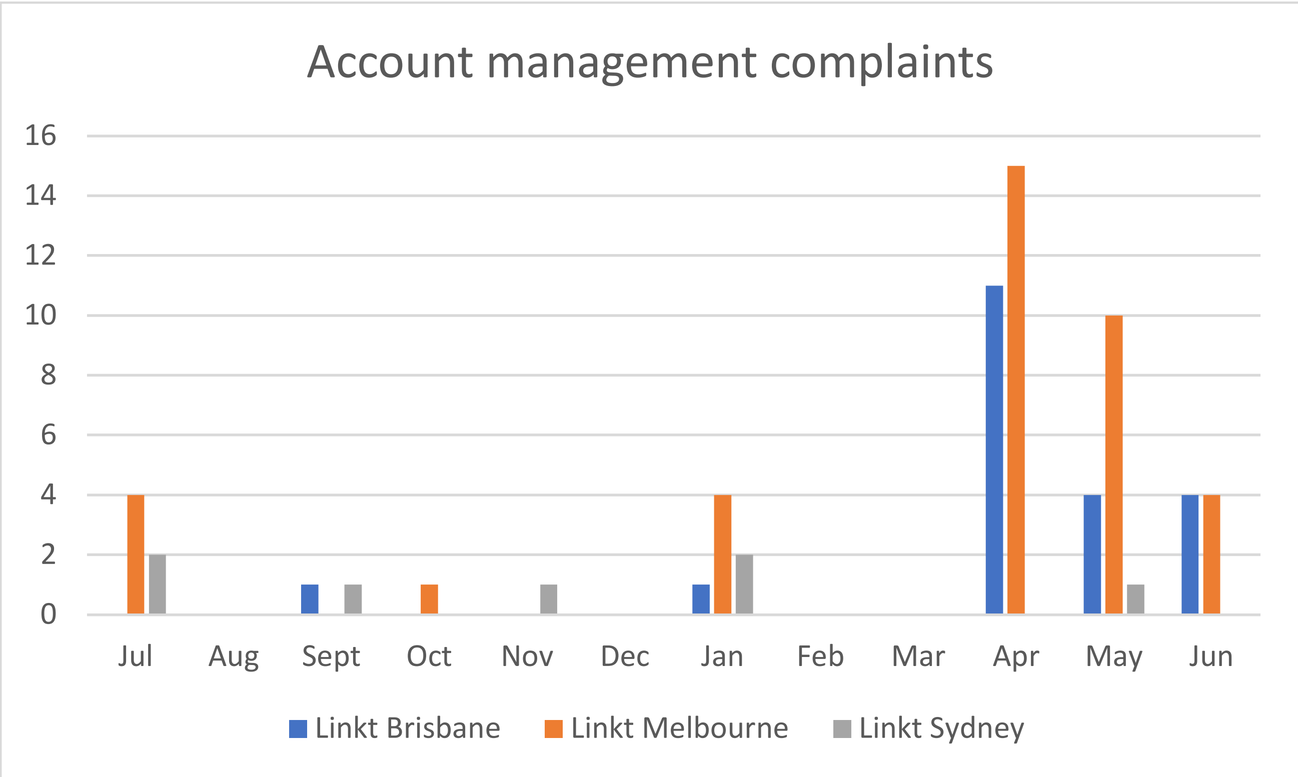
From March 2026, all new NSW customer complaints are referred to the NTOL website for lodgement of their complaint. Currently, TCO has 10 matters on foot for NSW. These relate to matters of more than 120 days outstanding and are relying on action from TU to resolve.

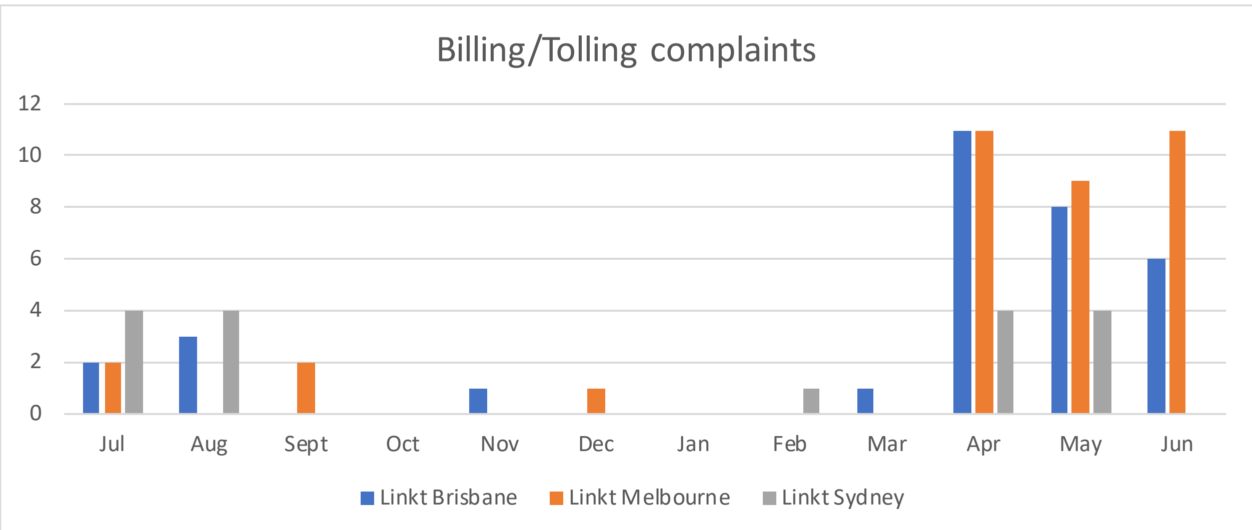
2.5 Types of complaints

As stated in the TCO TOR, the TCO primarily manages complaints related to:

- Account management
- Billing/tolling complaints
- Customer service
- Vehicle damage
- Incorrect information on the Toll Operator's web site.

The fundamental issues over the last quarter continue to relate to Accounts Management and Billing/Tolling (refer to graphs below). The issue of customer service is usually raised as part of complaints related to either accounts management or billing/tolling. Over the quarter, only two complaints were raised over vehicle damage, and no valid complaint was raised for incorrect information on TU's website.





3 SYSTEMIC ISSUES

Deeper analysis of June 2026 Quarter complaints revealed the most frequent types of complaints:

Category of complaint	**Percentage of all complaints**
Misreads	23%
Debt collection and infringement notices	17%
Top ups/passes/activations/suspensions	13%
Incorrect/inconsistent information	11%
Transfer of registration	11%

3.1 Misreads

Misreading of number plates is an ongoing issue. 23% of all complaints for the quarter related to this category. Automatic number plate recognition (ANPR) is used to levy tolls if a vehicle does not have a tag, the tag is faulty or there is no account or the account is suspended.

Reliance is placed on the customer to review all toll charges and raise a complaint with Linkt when a misread has occurred. Once a complaint of a misread number plate is made, TU places the registration number on a list for manual intervention.

The complaint will be resolved, in the first instance, only for the misreads to occur again, often repeatedly. In one instance, toll charges from repeated misreads have continued for over 10 years, where the customer has passed away and the vehicle on-sold. This has caused immense distress for the customer's family, who repeatedly are contacting this office and Linkt regarding the matter. Another example included a Qld registered truck being mistaken for a NSW registered small vehicle, suggesting that only the registration number was considered rather than the State of registration and type of vehicle.

Quite rightly, TU will refund any erroneous charges including administration fees but the number of misreads per complainant suggest that the current system is not working well. Transurban has regular audits of ANPR equipment and has advised this office that its equipment meets Australian standards. Reasons given for the problem have included:

- Misread not properly set up on misread register.
- Staff not properly viewing photographs.
- Registration number too close to another registration (e.g. a zero being mistaken for a Q).

In some instances, TU have asked the customer to change their registration plates and TU compensates for the cost. Again, the solution is put back on the customer to resolve.

This matter has been raised with TU on several occasions, and the TCO continues to monitor such complaints.

A further related issue is TU's requirement for customers to provide front, back and side photos of their vehicles before photographic evidence of a vehicle incurring a toll is provided. Sometimes, customers ask for a photo to confirm the vehicle incurring the toll was their vehicle. Customers complain that various police departments and state agencies provide photos without this type of identification evidence. Sometimes the customer does not have the vehicle in their possession or has previously sent TU the photos. TU states it is a privacy legislation issue. Perhaps TU may consider a less onerous approach to identification.

3.2 Debt Collection

Debt collection issues make up 17% of all complaints received this quarter. Once a debt collection agency (DCA) engages with customers, the anxiety level of the customer rises considerably. The TCO believes TU should take reasonable steps to ensure that they actively manage the debt collectors to make sure they are dealing with customers appropriately, including by acting in accordance with TU's financial hardship mechanisms and policies.

Once again, the TCO suggest that TU carefully review debt collector correspondence to ensure that the communication is clear and does not mislead or confuse.

It is expected that once a complaint is in the process of resolution, debt collection activity should be stayed, whether the resolution rests with Linkt or a formal TCO dispute. This includes raising unpaid invoices to Infringement level with State Government agencies. This continues to be of concern. Reasons given to customers and TCO for this issue include:

- Failure of staff to properly set up the stay the DCA after resolving or during resolution of complaint with customer.
- 30 day or in some instances 60-day holds being placed on DCAs but matter taking longer to resolve.

TU have indicated that they have now trained Level 1 call centre staff to raise DCA stays, but the issue continues.

Customers report confusion about TU 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 before the complaint is raised.

Frequently, multiple attempts are made through a variety of media (email, post, telephone, SMS) to contact customers but remain unsuccessful or the customers ignore the contact. Sometimes an unsuccessful contact situation is attributed to a failure to update contact details with the relevant licencing authorities.

Whilst the TCO understand the difficulties in these areas, TU does need in the short, medium, and longer term to resolve these issues as they are causing significant customer concern. The new Linkt App for customers implemented by Transurban seems to be assisting in greater accuracy of records and therefore making it more effective in reaching customers when required.

Outdated contact information continues to be raised as a problem and could explain the lack of success in reaching relevant customers. However, once debt collectors are engaged, the collection agency is quickly able to locate the customer and make contact. This implies that the customer can be reached through the application of different approaches.

TU has indicated in recent discussions with the TCO that the issues in respect of debt collectors are being focussed on.

3.3 Top ups/passes/activations/suspensions

These types of complaints make up 13% of all complaints for the quarter. They relate to:

- Customers not realising that outstanding tolls are incurred after an account is suspended and that toll charges can be swept into the account once it is topped up and reactivated. This leaves the customer surprised as to why the account soon becomes inactive again.
- Double charging where an account was inactive and toll passes were paid for, then when the account is reactivated, the customers are charged on their account for amounts already covered by the toll pass.
- Confusion as to creation of an account and how cut offs for backdating of previous travel are implemented.

Customers indicated in their complaints that they did not properly understand the process and that call centre responses were not helpful.

TU may need to consider how to provide more clarity on these issues on their websites and how their call centre staff respond effectively in these circumstances.

3.4 Incorrect information

Incorrect information accounted for 11% of all complaints for the quarter. Many complaints relate to customer interaction with the complaints call centre. Issues relate to calling on more than one occasion and variously:

- being given inconsistent information
- being told there is no record of any former contact regarding the matter.
- being told the matter is resolved but the customer continues to receive correspondence suggesting the matter has not been addressed.

Sometimes these calls are followed by failure of transfer of the call to supervisor or the call being cut off.

3.5 Transfer of registration

11% of all complaints for the quarter related to transfer of registration. These include:

- where a vehicle was sold, motor registry advised and TU advised of change of ownership but either the transponder was not removed or the new owner does not have an account/transponder or has failed to register the transfer, or the customer is being charged for tolls that were not incurred by them.
- vehicles that are subject to family law or domestic violence disputes often result in the customer receiving charges for vehicles currently used by their former partners. These matters are difficult for TU to resolve, as they are often civil matters.

3.6 Other issues

In most disputes consumers are particularly concerned with the quantum of administration fees. TU, as part of its resolution of long-standing disputes, sometimes waives all or some of the administration fees. In this period, there were many separate instances where TU waived part or all the administration fees to settle the dispute, often accompanied by a good will payment. This is a legitimate mechanism in dispute resolution. Customers, however, upon accepting a waiver and/or good will payment, write back to the TCO raising their concerns as to why an issue has been raised and what the TCO can do about it on a more holistic basis or asking how many other customers are experiencing the same issues. TU policy is outside the jurisdiction of the TCO; however, it is hoped that improvements in timeliness of dispute resolution and revised debt collection practices may go some way towards addressing these issues.

TCO will continue to advocate with TU for a more efficient and equitable complaint handling process.

Note: Post 30 June 2026, TU has expressed a commitment to work collaboratively to resolve the issues the TCO has raised in this Report.