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Mr Polume Lume

Director – Economics, Consumer & International Affairs

National Information & Communications Technology Authority (NICTA)

Email: consultation.submission@nicta.gov.pg

Subject | Submission on Draft Consumer-Protection Rule Amendment 2024 & Draft Consumer Complaints Management Guideline

Dear Mr Lume,

Garamut Connect Limited (GCL) welcomes NICTA's timely initiative to strengthen consumer safeguards. As a fully-licensed telecommunications operator and the proponent of the **Green Data Centre (GDC)**, the country's first tier-class terrestrial satellite gateway and cloud hub under bankable feasibility leading to construction in West Sepik, we wish to:

1. Reaffirm our commitment to universal access, data-democratisation, cyber-security and service reliability;
2. Outline how GCL's infrastructure roadmap advances NICTA's policy objectives; and
3. Offer concrete proposals to help ensure the draft instruments are effective, proportionate and future-proof.

1 | Executive Summary

1. **Strong support** – GCL endorses the broadened consumer-rights framework and the eight-step Consumer Complaints Management System (CCMS).
2. **Readiness** – Key GDC design features (multi-orbit satellite diversity, dual-feed power, SOC-aligned security and open-API billing) already anticipate the proposed obligations.
3. **Phased implementation** – A tiered compliance timetable, aligned with major-infrastructure commissioning, will minimise disruption and cost, especially for rural and satellite networks.

4. **Shared-responsibility model** – Clear demarcation of duties between wholesale facilities (e.g., GDC) and retail service providers will streamline complaints handling and accountability.
5. **Reg-tech partnership** – We are prepared to pilot machine-readable CCMS data-exchange and an AI-governance regulatory sandbox hosted in the GDC.

2 | Context: GCL and the Green River Data Centre

Milestone (2024-26)	Relevance to draft rules
GDC Phase-1 build - dual-path fibre, satellite earth-station, Tier-III power plant)	Enables >99.9 % uptime target, aligning with service-disruption notification & compensation clauses.
Multi-orbit satellite & E-/G-band back-haul trials	Underpins equitable access for remote users and affordable bandwidth tiers required by Fair & Reasonable Pricing provisions.
OSS/BSS modernisation - real-time usage dashboard, spend alerts	Satisfies Detailed Billing, Usage Notifications and Informed Consumer Choice mandates.
AI-enabled NOC & customer-care bots (in development)	Falls under new AI transparency & bias-mitigation requirements.
Universal-Service Pilot POPs - health posts & rural banking kiosks	Demonstrates commitment to inclusive access and supports NICTA's digital-inclusion goals.

3 | Comments on Specific Draft Provisions & GCL Recommendations

Draft Section	GCL Comment	Recommended Adjustment
7 – Informed Consumer Choice (CIS, usage data, honest advertising)	GCL systems will deliver app-based dashboards, SMS/USSD spend alerts and 6-month itemised histories at launch.	Recognise network-latency constraints in satellite environments when setting “real-time” thresholds; e.g., allow ≤5-minute window for usage updates.
8 – Fair & Reasonable Pricing / Bill-Shock	We support mandatory pre-pay bundle exhaustion alerts and opt-out controls for value-added services.	Permit a 12-month grace period for legacy prepaid platforms to integrate automated usage alerts, prioritising first urban, then rural nodes.

Draft Section	GCL Comment	Recommended Adjustment
9 – Equitable Access & Treatment (PWD, vulnerable users)	GCL will incorporate voice-over-LTE, multi-lingual IVR and disability-friendly web portals; handset obligations, however, lie with OEM importers.	Clarify that the <i>device-accessibility duty</i> applies to importers/distributors, with operators facilitating consumer education and subsidised device programmes.
10 – Protection & Safety / AI Use	We support risk-based audits and AI use disclosure in customer care.	Insert a “regulatory sandbox” clause for operators to trial AI tools under NICTA oversight before full-scale rollout. GCL offers the GDC as host environment.
11 – Complaint & Redress / CCMS	The eight-step workflow is sound. For colocation facilities the “service provider” role can be ambiguous.	Add a <i>Shared-Responsibility Annex</i> that allocates CCMS obligations across facility operators, wholesale carriers and retail ISPs. Template clauses could be embedded in NICTA-approved reference interconnection agreements.
12 – Compliance & Penalties	GCL supports strict penalties for wilful non-compliance.	Adopt a tiered penalty framework that rewards self-reporting of breaches and execute corrective plans (encourages transparent culture).

4 | Proposed Partnership Initiatives

1. CCMS Data-Exchange Pilot

GCL will expose anonymised complaint metrics via secure API to NICTA, slashing manual reporting and enabling real-time oversight.

2. Service-Reliability Dashboard

Leveraging the GDC’s analytics stack, we can publish network-uptime heatmaps accessible to NICTA and the public, advancing transparency.

3. AI-Governance Testbed

In collaboration with local universities and NICTA, the GDC can host controlled trials of AI customer-service and network-optimisation tools, with bias-and-privacy audits.

4. Inclusive-Access Fund

GCL proposes a co-financed scheme (industry + government) to underwrite disability-friendly devices and rural POP back-haul, administered under NICTA’s Universal Access framework.

5 | Implementation Timeline Alignment

Compliance Deliverable	GCL Target	Linked Draft Provision
Launch of real-time spend-alert engine	Q4-2027	§§ 7.4, 8.3
CCMS ticketing & public register integration	Q1-2028	§ 11
First AI customer-bot sandbox audit	Q2-2028	§ 10.1
Universal-Service rural POPs (Phase-1) online	Q3-2028	§§ 3, 9
Full SLA-based compensation module live	Q4-2028	§ 3.6

We respectfully request that NICTA's final instruments adopt a **staggered enforcement window (up to 24 months)** for new OSS/BSS and AI controls, beginning on the date each operator commercially launches the relevant service. Note: *GCL Target dates subject to GDC construction schedule.*

6 | Final Thoughts

GCL is firmly aligned with NICTA's vision of a fair, transparent and resilient telecommunications landscape. Our Green River Data Centre and satellite-enabled rural rollout place us at the heart of Papua New Guinea's digital transformation. We stand ready to:

- Integrate the draft Consumer-Protection provisions into our product and network design;
- Pilot technology solutions that lower regulatory overhead and raise consumer trust; and
- Collaborate with NICTA to ensure that universal access, data democratisation, cyber-security and service reliability move from policy to reality.

We thank NICTA for the opportunity to contribute and remain available to discuss any aspect of this submission or to participate in stakeholder workshops.

Yours sincerely,



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Cc: Kila Gulo Vui, Chief Executive Officer, NICTA
Attachments: None