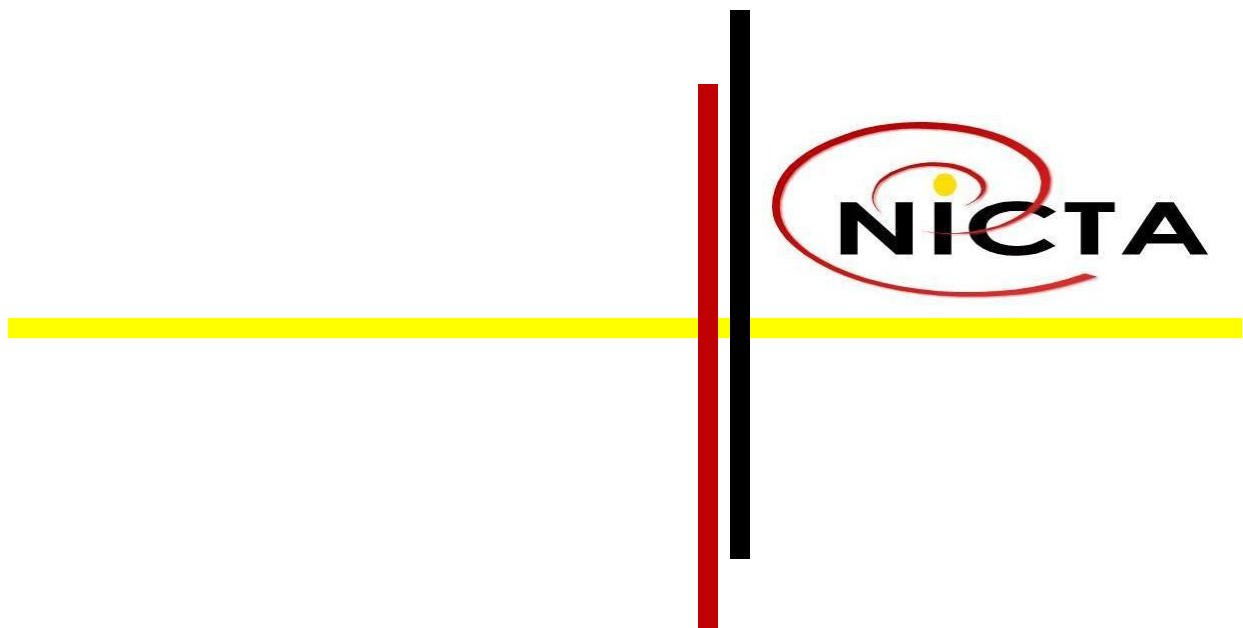




**RESPONSE TO COMMENTS REPORT ON THE
DRAFT CONSUMER COMPLAINTS
MANAGEMENT SYSTEM GUIDELINE**

19 August 2025

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1. Executive Summary

The National Information and Communications Technology Authority (NICTA) of Papua New Guinea develops the Consumer Complaints Management System Guideline (“**the Guideline**”) in fulfillment of its mandate under Part VII and Sections 9(f) and 9(i) of the National ICT Act 2009 (“**the Act**”). These provisions empower NICTA to establish mechanisms that protect consumers, ensure fair treatment, and create systems for monitoring and resolving complaints in the ICT sector.

The Guideline sets out a structured and transparent framework for managing consumer complaints, particularly where issues remain unresolved at the service provider level. It reinforces NICTA’s statutory responsibility to safeguard consumer rights, promote accountability, and ensure fairness in ICT services. Complaints escalated to NICTA are investigated in accordance with Section 238 of the Act and other relevant regulatory instruments, providing a clear process for impartial and consistent resolution.

The purpose of the Guideline is to complement, rather than replace, the internal complaints-handling procedures of service providers. Service providers remain the first point of contact for consumers, but where their internal mechanisms fail to resolve issues, the Guideline provides a regulatory pathway for escalation to NICTA. This dual approach strengthens consumer protection while supporting industry efficiency and accountability.

Through its consultation process, NICTA engages with stakeholders to raise awareness of its regulatory role and to incorporate constructive feedback. Input from stakeholders has helped refine the Guideline to ensure that it is both practical in its application and firmly aligned with the legislative provisions of the Act.

The Guideline provides clarity for consumers by defining how and when complaints may be referred to NICTA, while also ensuring that service providers maintain responsibility for addressing complaints in the first instance. This enhances transparency, fosters trust, and provides assurance that unresolved consumer issues will be subject to regulatory oversight.

2. Introduction

2.1. Background and Purpose of the Consultation

The National Information and Communications Technology Authority (NICTA) is the principal regulator of Papua New Guinea’s ICT sector. In line with its statutory mandate to protect consumer interests, NICTA initiated a public consultation on the Proposed Consumer Complaints Management System Guideline. This initiative was prompted by increasing consumer concerns across a range of issues, including the cost of services, marketing practices, misleading conduct, fair treatment, protection of personal data, abusive behavior, and dissatisfaction with the resolution of complaints by service providers.

The primary objective of the Consultation Paper was to develop a standardized Consumer Complaints Management System Guideline that establishes NICTA’s internal complaints handling framework, while also ensuring that licensed ICT service providers are fully informed of this process. The aim is to improve the effectiveness, fairness, transparency, and consistency in how consumer complaints are managed within the ICT industry particularly before such complaints are escalated to NICTA for further action.

Specifically, the objectives of the Guideline include:

- Ensuring alignment with Part VII of the National ICT Act 2009, which outlines NICTA's functions regarding consumer protection and complaint resolution;
- Establishing minimum standards and processes for complaint handling, including defined timelines, escalation procedures, reporting obligations, and record-keeping requirements;
- Strengthening consumer trust in the complaints process by promoting accessibility, responsiveness, and accountability in how service providers address grievances;
- Providing a framework for regulatory oversight, enabling NICTA to monitor service providers' complaint-handling performance through structured reporting and review mechanisms.

The Consultation Paper was published on NICTA's official website on May 16, 2025, with an initial deadline for written submissions. To allow stakeholders sufficient time for review and feedback, the deadline was subsequently extended to July 11, 2025. Feedback was received from the following licensees:

1. Digicel (PNG) Limited
2. Telikom Limited
3. National Gaming and Control Board (NGCB)
4. MyNet
5. Garamut Connect Limited (GCL)

The consultation provided valuable insights, which have been incorporated into the Guideline to ensure it reflects both regulatory requirements and practical considerations within the ICT industry.

2.2. Scope of the Guideline and Consultation Process

The proposed Guideline applies to all ICT service providers licensed under the Act. It encompasses a broad range of consumer complaints, including those related to quality of service, billing and charges, service availability, contract-related issues, deceptive practices, and concerns over privacy and data protection.

The Guideline outlines key responsibilities for service providers, including the establishment of accessible and responsive complaint-handling mechanisms, timely acknowledgment and resolution of complaints, appropriate escalation of unresolved issues, and maintenance of accurate records to support oversight and reporting to NICTA. In turn, NICTA's role involves receiving escalated complaints, monitoring overall compliance, and taking appropriate regulatory action where necessary.

To ensure inclusiveness and transparency, the development of the Guideline was supported by a public consultation process. A Consultation Paper was published to invite feedback from stakeholders within a defined period. NICTA carefully reviewed all submissions received, considered the views and proposals presented, and refined the draft Guideline accordingly. The outcomes of this process are reflected in the Final Report and the finalized Guideline.

3. Stakeholder Feedback and NICTA's Engagement

3.1 Digicel PNG: Key Positions and NICTA Responses

Digicel PNG submitted detailed feedback on 11 July 2025 regarding the proposed Complaints Management Guideline. NICTA recognizes the submission as a solid foundation for refining the guideline and appreciates Digicel's constructive engagement and commitment to consumer protection.

- 1) **Definition of Complaint:** Digicel PNG recommended adopting the Australian definition to clearly distinguish complaints from general inquiries. Advocates for a clear, standard definition of "complaint" to distinguish it from general enquiries, recommending the Australian Telecommunications definition. (Consumer Complaints) Record-Keeping Rules 2018 definition: *"...an expression of dissatisfaction made to a carriage service provider by a consumer in relation to its telecommunications products or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected by the consumer."*

NICTA Response: In accordance with Sections 9(f) and 9(i) of the National ICT Act 2009, NICTA is mandated to develop and oversee mechanisms that promote effective consumer protection. These provisions provide the legal basis for establishing a working definition of "complaint" within local context, enabling complaints to be systematically received, monitored, and resolved. While international definitions provide valuable guidance, NICTA will ensure that the adopted definition is appropriately localized to reflect the regulatory, operational, and consumer protection framework under the National ICT Act 2009, clearly distinguishing complaints from general enquiries and supporting transparent and accountable complaint handling across the ICT sector.

- 2) **Complaint Intake and Registration:** Digicel PNG supported provider-specific intake processes but recommended standardizing the minimum information collected from complaints.

NICTA Response: NICTA requires all licensed providers to collect a minimum set of complaint details, including complainant contact information, date and time, complaint category and description, the channel used to submit the complaint, and a provider-issued reference number. Providers must publish a clear complaints policy, submit it to NICTA, and accept complaints through multiple channels, including verbal complaints. While internal workflows can continue, providers must report data in NICTA-prescribed formats. NICTA may audit or review submissions to ensure compliance, guided by international standards, adapted to PNG's legal and market context.

- 3) **Standardized Complaint Platform:** Digicel PNG opposed mandating a single complaints platform, advocating instead for consistent data field standards across providers.

NICTA Response: NICTA has the legislative mandate to procure and develop a complaints platform that can be made available for use by service providers. Importantly, the platform will not alter or interfere with providers' existing internal complaints-handling systems. Its primary function will be to require providers to

capture and submit a set of standardized minimum complaint data fields in a consistent format.

In addition, providers will be required to submit their complaint-handling manuals to NICTA for review. This approach enables effective oversight, promotes harmonization of complaint practices over time, and ensures the protection of consumer interests, all while avoiding unnecessary technical or operational burdens on providers.

- 4) Acknowledgment and Internal Resolution:** Digicel PNG recommended that complaints should initially be directed to service providers, giving them a fair opportunity to resolve issues internally before escalation to NICTA.

NICTA Response: NICTA supports this principle. In line with international best practice and the National ICT Act 2009, it is a standard requirement that consumers first lodge their complaints directly with their service provider and allow the provider an opportunity to resolve the matter. NICTA will only accept complaints that remain unresolved after this step and must be accompanied by a provider-issued complaint reference number as evidence that the matter was first raised internally. This process ensures procedural fairness, encourages timely resolution at the provider level, and enables NICTA to exercise effective regulatory oversight where intervention is necessary.

- 5) Preliminary Investigation Effectiveness:** Digicel PNG suggested that providers file their internal complaints processes with NICTA and that investigations proceed only after providers have attempted internal resolution.

NICTA Response: Providers are required to submit their internal complaints-handling processes to NICTA for review. In line with Section 238 of the National ICT Act 2009, NICTA will only commence a preliminary investigation once the provider has fully processed the complaint and it remains unresolved. This ensures accountability, procedural fairness, and effective regulatory oversight without duplicating providers' internal efforts.

- 6) Maximum Timeframes:** Digicel PNG recommended measuring timeframes in business days, pausing when awaiting third-party input, and framing timeframes as performance targets.

NICTA Response: NICTA emphasizes that complaint-handling timeframes are binding regulatory requirements, even though they are not prescribed directly in statute. Service providers are required to resolve complaints within a maximum of 30 working days, which reflects established industry best practice and regulatory expectations. Pauses may be permitted where resolution depends on third-party input, provided these delays are clearly documented. This approach ensures accountability, consistency, and timely resolution of consumer complaints.

- 7) Differentiated Timeframes by Complaint Type:** Digicel PNG supported variable resolution timeframes according to complaint complexity while keeping initial acknowledgment uniform.

NICTA Response: NICTA acknowledges the different resolution timeframes based

on complaint type, reflecting current operational best practices across the ICT industry. Resolution periods may vary according to the complexity and nature of the complaint, while acknowledgment times remain uniform to ensure prompt consumer engagement. To maintain accountability and transparency, all providers are required to submit their internal complaints handling manuals to NICTA. While these timeframes are currently guided by industry practice rather than statutory mandates, NICTA will consider formalizing specific turnaround requirements soon, depending on evolving sector dynamics and the need to safeguard timely consumer redress.

- 8) Performance Targets:** Digicel PNG suggested an 80–90% resolution threshold for measuring complaint handling performance.

NICTA Response: NICTA considers this a practical benchmark, allowing flexibility for complex cases while ensuring timely resolution of most complaints. This ensures accountability without imposing unrealistic operational expectations.

- 9) Complaint Management Responsibilities and Escalation:** Digicel PNG recommended that complaints escalate to NICTA only after exhausting the provider's internal process.

NICTA Response: NICTA supports this approach. As a third-party regulator, NICTA intervenes only after internal processes are exhausted. Complaints outside NICTA's mandate are referred to the appropriate agency.

- 10) Full Investigation Process:** Digicel PNG recommended transparent scoping and timing, relevant and lawful information requests, and maintaining confidentiality during investigations. They emphasized that officers' mandates should be administrative and limited to relevant laws.

NICTA Response: All investigations will be conducted in accordance with the relevant provisions of the National ICT Act 2009. Investigations will be transparent, lawful, and maintain strict confidentiality.

- 11) Reporting and Recommendations:** Digicel PNG emphasized confidentiality and identifying systemic issues for broader regulatory review.

NICTA Response: In line with Sections 44, 241(4)(b), and 242, and the Consumer Protection Rules (CPR), all complaint communications will remain confidential. Systemic issues will be escalated for regulatory review, supporting continuous industry improvement.

- 12) Follow-up and Monitoring:** Digicel PNG recommended that investigation findings should be available to both providers and complainants and limited to NICTA's statutory authority.

NICTA Response: NICTA affirms that procedural fairness will guide all investigations under Section 241(4)(b). Recommendations help providers address issues, and NICTA will monitor compliance. This approach fosters transparency, accountability, and consumer trust in the complaint management system.

3.2. Telikom Limited: Key Positions and NICTA Responses.

- 1) **Complaint Intake and Registration:** Telikom Limited emphasized that consumers should provide essential details, such as faulty number, name, location, and alternative contacts, and that service providers should verify complainants to prevent third-party reporting issues. Telikom also supports adopting a standardized complaint form or platform and suggested that NICTA check with service providers quarterly to ensure consistency in complaint handling.

NICTA Response: The Complaints Handling Guideline serves as a regulatory framework, setting minimum standards for complaint intake, registration, verification, and resolution, while allowing operational flexibility. NICTA will engage with providers to monitor compliance, support improvements, and consider gradual harmonization of complaint processes. Verification of complainants is necessary, but it must not create barriers for legitimate complaints, particularly for vulnerable or less technically literate consumers. Quarterly engagements with providers will be strengthened to enhance compliance and continuous improvement.

- 2) **Acknowledgment and Initial Assessment:** Telikom highlighted that its system registers complaints effectively and issues reference numbers but recommended improving ongoing updates to consumers.

NICTA Response: Providers should issue prompt acknowledgments within 24 hours and maintain consistent, timely communication throughout the complaint lifecycle. NICTA encourages implementing customer feedback channels, enhancing update protocols, and using technological solutions such as SMS, mobile apps, or emails for real-time updates. Quarterly reporting to NICTA should include metrics on acknowledgment times, updates, and resolution rates to monitor compliance and drive service improvements.

- 3) **Preliminary Investigation:** Telikom suggested that first-contact officers should be highly trained to resolve issues swiftly, ideally within ten minutes, and that different complaint types (e.g., billing disputes vs. network issues) should have differentiated resolution timeframes.

NICTA Response: NICTA welcomes the focus on rapid resolution but notes that not all complaints can be resolved within ten minutes. Differentiated timeframes based on complaint type are supported, with billing disputes to be resolved within 48 hours or less. Tiered timeframes will be established in the revised Complaints Management Guidelines to ensure clarity, fairness, and practical operational expectations. First-contact officers should be technically trained to handle common issues efficiently.

- 4) **Escalation:** Telikom follows an internal escalation metric to resolve complaints at different levels.

NICTA Response: NICTA acknowledges this approach and encourages all licensees to develop transparent escalation procedures, including clear timeframes and contact points at each level. Providers may be asked to submit their escalation frameworks to ensure alignment with the revised guidelines and regulatory expectations.

- 5) Full Investigation:** Telikom noted that harassment complaints require a search warrant, which its legal team must handle, and cybercrime-related complaints follow internal referral processes.

NICTA Response: NICTA recognizes Telikom's legal constraints and agrees that investigations must comply with legal requirements, including obtaining warrants when necessary. Complaints involving cybercrime fall outside NICTA's jurisdiction and must follow appropriate referral processes. Licensees should ensure coordination between legal and operational units to expedite warranted investigations and maintain consumer trust.

- 6) Reporting and Recommendations:** Telikom indicated that its current process is effective but could improve internal communication among departments.

NICTA Response: NICTA agrees that internal coordination between legal, technical, and customer service teams is critical for effective complaint resolution. Documenting internal workflows and sharing best practices with NICTA during quarterly reviews is encouraged to enhance transparency and compliance.

- 7) Follow-up and Monitoring:** Telikom recommended establishing timeframes for troubleshooting at different levels to strengthen follow-up and monitoring.

NICTA Response: NICTA supports this recommendation and will incorporate timeframes into the revised Consumer Protection Rules (CPR). This ensures complaints, whether resolved or escalated, are consistently monitored and closed within reasonable timeframes. Service providers may be required to submit periodic reports on unresolved complaints to support regulatory oversight and identify emerging trends proactively.

3.3. National Gaming Control Board (NGCB): Key Positions and NICTA Responses

The National Gaming Control Board (NGCB) provided extensive feedback on NICTA's Draft Complaints Management Guideline, commending the Authority's efforts to strengthen consumer protection in the ICT sector. NGCB's recommendations focus on reinforcing accountability, transparency, and alignment with international best practices while complementing existing regulatory mandates.

- 1) Legal and Legislative Framework:** NGCB emphasized the need for a clear, step-by-step complaints handling process, including statutory timeframes for acknowledgment, investigation, resolution, and appeals. They recommend providing accessible guidance for consumers on complaint submission, adjudication, and public reporting under Section 242 of the National ICT Act 2009. Furthermore, NGCB highlighted the importance of periodic training for enforcement personnel, proactive monitoring for breaches, and a well-defined enforcement mechanism under Section 244.

NICTA Response: NICTA acknowledges the importance of a strong legislative foundation. The Guideline will be refined to include detailed procedures and the statutory timeframes to enforce compliance is encouraged however NICTA understands that not all complaint types would have similar resolution timeframes, we are also aware that there are operational best practices which govern the

standard timeframes to resolve complaints. Clear guidance will be provided to consumers, and published reports will be made accessible and transparent. Training programs, enhanced monitoring protocols, and explicit enforcement mechanisms will be incorporated to ensure regulatory accountability and compliance.

- 2) Complaint Intake and Registration:** NGCB recommends a uniform submission protocol using standardized forms or digital platforms, multiple submission channels (phone, email, online, physical points), and mandatory verification to reduce incomplete or invalid complaints.

NICTA Response: NICTA acknowledges NGCB's recommendation for a uniform submission protocol and supports the principle of standardization in complaint submission processes. Under Sections 9(f) and 9(i) of the National ICT Act 2009, NICTA is mandated to establish systems that ensure complaints are effectively received, monitored, and resolved. Standardized forms or digital platforms, supported by multiple submission channels such as phone, email, online portals, and physical offices, would promote accessibility and consistency across the ICT sector. Furthermore, NICTA emphasizes the importance of mandatory verification to ensure the accuracy, validity, and completeness of complaints. This measure aligns with international best practices in complaint management and strengthens transparency and accountability in the resolution process. While service providers must maintain their own internal complaint-handling procedures, NICTA is committed to ensuring that complaints escalated to the Authority are processed through a consistent and reliable framework, thereby reducing inefficiencies and safeguarding consumer rights.

- 3) Acknowledgment and Initial Assessment:** NGCB proposed a 48-hour acknowledgment timeframe with follow-up mechanisms to confirm receipt, along with jurisdictional clarity and priority classification (High, Medium, Low) for complaints.

NICTA Response: The 24 to 48-hour acknowledgment timeframe is a generic operational practice widely employed across the industry for complaints management. While this serves as a standard guideline, it does not require formal prescription, and any adjustments or enhancements will be considered as part of ongoing improvements to the complaints handling framework. Jurisdictional boundaries will be clarified, and priority classifications introduced to ensure consistent handling based on urgency.

- 4) Preliminary Investigation:** NGCB recommended statutory maximum time limits for all stages, service providers' response obligations, and clear escalation protocols to prevent delays.

- 5) Escalation Process:** NGCB suggested transparent tracking, legally enforceable follow-up, and clearly defined obligations and timelines for cases referred to external bodies to strengthen inter-agency coordination.

NICTA Response: NICTA will codify maximum timeframes for all procedural stages, define service provider response obligations, and standardize escalation pathways. Transparent tracking and enforceable follow-up will be prioritized, with

strengthened inter-agency coordination for referred complaints.

- 6) Full Investigation:** NGCB recommended standardized evidentiary procedures (document collection, witness interviews, compliance verification), continuous stakeholder engagement, and clear communication of findings, including complainants' right to appeal.

NICTA Response: NICTA acknowledges the importance of statutory timeframes to enforce compliance under Sections 242 and 244 of the National ICT Act 2009, which provide for reporting obligations and regulatory enforcement measures. At the same time, we recognize that different types of complaints may require varying resolution periods, and that a single uniform timeframe may not be practical for all cases. We also note that current industry practices reflect established operational best practices, providing reasonable timeframes tailored to the nature and complexity of complaints. NICTA will consider these factors when refining the Complaints Management Guideline to balance regulatory oversight with operational realities in the ICT sector.

- 7) Complaint Resolution and Closure:** NGCB emphasized transparent communication of resolution outcomes, detailed documentation of actions, timelines, responsible entities, and a legislatively defined appeals process.

NICTA Response: NICTA supports the transparent communication of complaint resolution outcomes to consumers, ensuring that all actions taken and responsible entities are clearly documented. The Complaints Management Guideline will be designed to remain adaptive to future developments while formally integrating and expanding the legislatively defined appeals process under *Section 256* of the *National ICT Act 2009*, thereby safeguarding consumer rights and promoting accountability within the ICT sector.

- 8) Follow-up and Monitoring:** NGCB recommended post-resolution follow-ups to assess satisfaction, performance-based KPIs, advanced analytics to identify trends, robust feedback mechanisms, and continuous training for complaints-handling officers.

NICTA Response: NICTA is committed to strengthening its follow-up and monitoring processes over time. This will include post-resolution follow-ups to assess consumer satisfaction, the use of performance-based KPIs, leveraging advanced analytics to identify complaint trends, implementing robust feedback mechanisms, and providing continuous training for complaints-handling officers to ensure effective, transparent, and accountable complaint management.

4. NICTA's Overview of Industry Responses

NICTA recognizes the constructive engagement of stakeholders and notes several key issues:

- 1) Definitions and Standardization:** Clear definitions of complaints, minimum data requirements, and standard procedures improve transparency and accountability.

- 2) **Acknowledgment and Resolution:** Uniform acknowledgment timeframes and escalation criteria ensure fairness while allowing flexibility for complaint complexity.
- 3) **Investigations and Confidentiality:** Tiered investigations, lawful information requests, and confidentiality safeguards protect both consumers and providers.
- 4) **Monitoring and Follow-up:** Performance tracking, feedback mechanisms, and training programs reinforce continuous improvement.

NICTA maintains a pragmatic approach, balancing statutory mandates with current operational capacity. While comprehensive system-wide changes require resources and gradual adoption, achievable steps are implemented immediately, including standardized data fields, escalation protocols, and monitoring mechanisms.

5. NICTA's Undertakings

Under the National ICT Act 2009 and the Consumer Protection Rules, NICTA undertakes to:

- 1) Develop and maintain procedures, manuals, and guidance to ensure complaints are efficiently received, monitored, and resolved.
- 2) Require service providers to submit complaint-handling manuals, report on compliance, and adopt consistent minimum standards.
- 3) Monitor adherence to acknowledgment, investigation, and resolution timeframes, and ensure procedural fairness in line with *Sections 238, 241, 242, 244, and 256* of the Act.
- 4) Use the Guideline as a regulatory tool to improve industry standards, consumer protection, and accountability across all ICT service providers.

NICTA leverages mandatory instruments and operational protocols to ensure implementation, progressively enhancing efficiency, transparency, and consumer trust across the sector.

6. Conclusion

The consultation process has been instrumental in shaping a robust, legally compliant, and practical Complaints Management Guideline. Stakeholder feedback from Digicel PNG, Telikom Limited, NGCB, MyNet, and Garamut has been fully considered, providing valuable insights to refine key areas such as definitions, standardized intake procedures, differentiated resolution timeframes, investigation protocols, and follow-up and monitoring mechanisms.

Developed under *Sections 9(f) and 9(i)* of the *National ICT Act 2009*, the Guideline establishes a structured avenue for consumers to escalate complaints unresolved by service providers, while enabling NICTA to monitor industry practices. It promotes accountability, transparency, and consumer confidence, ensuring that complaints are handled fairly and consistently across the ICT sector.

While the Guideline does not mandate system redesigns by service providers, it clarifies NICTA's oversight role and sets minimum standards for complaint registration, acknowledgment, investigation, resolution, and monitoring. By implementing these internal complaints framework, NICTA reinforces its mandate to protect consumer rights, provide regulatory oversight, and drive continuous improvement in complaint-handling processes.

NICTA adopts a phased, pragmatic approach, focusing on achievable improvements within current operational capacity while progressively implementing more comprehensive measures. Through its statutory mandate under the *National ICT Act 2009*, the Consumer Protection Rules, and supporting instruments, NICTA ensures the Guideline serves as an actionable tool to enhance service standards, regulatory compliance, and consumer trust.

Ultimately, the Guideline positions NICTA as a transparent, accountable, and consumer-focused regulator, strengthening the integrity of the ICT sector and ensuring that consumers have a clear and reliable avenue for redress.

Annexure 1: Summary of the Industry (Digicel PNG, Telikom Limited & NGCB) responses and Feedback

No	Submission	Reference or Subject	Summary of Comment	NICTA's response
1	Digicel PNG	Digicel PNG's response to the Proposed Consumer Complaints Management System Guidelines. On page 2, paragraph vi, Digicel PNG stated that it is vital to establish a clear definition of "complaint", suggesting adoption of the Australian Telecommunications model.	Advocates for a clear, standard definition of "complaint" to distinguish it from general enquiries, recommending the Australian Telecommunications definition. (Consumer Complaints) Record-Keeping Rules 2018 definition: "...an expression of dissatisfaction made to a carriage service provider by a consumer in relation to its telecommunications products or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected by the consumer."	NICTA notes the Australian definition of "complaint" but clarifies that while the National ICT Act 2009 does not provide a specific definition, Sections 9(f) and 9(i) empower NICTA to establish one. NICTA adopts a localized definition, benchmarked against international best practices, to ensure complaints are systematically managed, clearly distinguished from general enquiries, and handled transparently and consistently across the ICT sector.
2	Digicel PNG	Digicel's response to the Guideline on page 3, paragraph vii (a), in response to Question 1 ("Complaint Intake and Registration")	Supports a baseline information requirement for complaint intake with provider-specific processes; recommends unique reference IDs and accessible complaint handling policies.	NICTA supports the establishing of a minimum required complaint information fields and supports provider flexibility in intake methods, while mandating unique complaint reference IDs and public complaint handling policies.
3	Digicel PNG	Digicel's response to the Guideline on page 4, paragraphs 13–15, in response to Question 2	Recommends baseline procedures: prompt acknowledgment, accurate logging, unique reference numbers, clear resolution outcomes, and guidance on external resolution	NICTA supports the proposed baseline complaint handling steps to ensure transparency, consistent documentation, and consumer awareness of escalation options.

		("Minimum Requirements for Receiving and Resolving Complaints"),	options.	
4	Digicel PNG	Digicel's response to the Guideline on page 5, paragraphs 16–19, in response to Question 3 ("Standardized Form or Platform").	Opposes a standardized platform; supports standardizing minimum information fields for flexibility.	NICTA will not mandate a single complaint handling platform due to technical and administrative burdens but will require all providers to collect and report on standard minimum complaint data fields. Providers must also submit their complaints handling manuals for NICTA's review to ensure compliance, enable oversight, and promote a harmonized framework while allowing operational flexibility.
5	Digicel PNG	Digicel's response to the Guideline on page 6, paragraphs 20–24, in response to Question 4 ("Acknowledgement and Initial Assessment").	Recommends NICTA only assess complaints after provider's process is exhausted, requiring provider-issued reference numbers.	NICTA supports in principle that complaints should first be addressed through the provider's internal process. NICTA will only accept unresolved or overdue complaints accompanied by the provider-issued reference number, ensuring internal resolution is attempted before regulatory oversight.
6	Digicel PNG	Digicel's response to the Guideline on page 7, paragraphs 25–28, in response to Question 5 ("Preliminary Investigation Effectiveness").	Suggests requiring providers to file internal complaints process with NICTA before investigations proceed.	NICTA supports this measure in principle, as it enhances procedural clarity and ensures orderly, transparent complaint management. Before initiating an investigation, NICTA will require the service provider to submit its internal complaints process and evidence that the complaint has been fully addressed under that process.
7	Digicel PNG	Digicel's response to the	Supports target timeframes in	NICTA supports differentiated complaint resolution

		Guideline on page 8, paragraphs 29–36, in response to Question 6 ("Maximum Timeframes")	business days, paused when awaiting third-party input, framed as performance targets.	timeframes based on complaint type, aligned with current industry best practices, while maintaining uniform acknowledgment times. Providers must submit internal complaint manuals for transparency. Timeframes are not yet statutory but may be formalized in the future depending on industry needs.
8	Digicel PNG	Digicel's response to the Guideline on page 9, paragraphs 37–39, in response to Question 7 ("Differentiated Timeframes by Complaint Type")	Supports differentiated resolution timeframes based on complaint type, with uniform acknowledgement time.	NICTA supports operational best practices in complaints handling and resolution which is standard across industry and vary based on the nature and complexity of the complaint. Providers must provide internal complaint manual for accountability and transparency purposes.
9	Digicel PNG	Digicel's response to the Guideline on page 10, paragraphs 40–41, in response to Question 8 ("Complaint Management Responsibilities and Escalation").	Considers complaints to NICTA as escalation after provider process exhaustion; seeks clarification on "external bodies".	Complaints should first be lodged with the service provider and that the provider must be given a reasonable opportunity to resolve the matter through its internal processes. Escalation to NICTA will occur only after these avenues have been exhausted and the complaint remains unresolved. NICTA's escalation criteria apply solely to its own internal and external processes. Internally, matters within its mandate will be referred to higher authority for decision-making; externally, issues outside its mandate will be directed to the relevant agency.
10	Digicel PNG	Digicel's response to the Guideline on pages 11–12, paragraphs 42–47, in	Recommends tiered complaint handling, scope-limited investigations, and strong	NICTA supports transparent, scoped, and timely investigations, empowered under Sections 238 and 246 of the NICT Act to investigate complaints and

		response to Question 9 ("Full Investigation Process"),	confidentiality measures.	obtain necessary information. NICTA commits to lawful, relevant data requests, strict confidentiality, and will develop an Investigation Manual to guide fair and effective complaint handling.
11	Digicel PNG	Digicel's response to the Guideline on page 13, paragraphs 48–49, in response to Question 10 ("Reporting and Recommendations").	Emphasizes confidentiality in reporting findings and flagging systemic issues.	NICTA commits to maintaining strict confidentiality during complaint investigations in line with Section 44 of the NICT Act and the Consumer Protection Rules. Systemic issues identified will be escalated for broader regulatory review to enhance industry standards and consumer protection.
12	Digicel PNG	Digicel's response to the Guideline on page 14, paragraph 50, in response to Question 11 ("Follow-up and Monitoring").	Advocates limits on remedies within legal authority and proactive trend monitoring.	NICTA upholds procedural fairness under Section 241(4)(b) of the NICT Act, ensuring all parties can respond before adverse findings. Follow-up and monitoring promote compliance, with NICTA overseeing providers' implementation of recommendations to maintain consumer confidence and regulatory accountability.
13	Telikom Limited	Telikom's response to the Guideline on page 1 of Telikom Limited's public consultation submission; Paragraph 3, in response to the First Stage of the complaints process; Complaint Intake & Registration	Consumers should provide faulty number, name, location, and two alternative contact numbers. Service providers should verify complainants to avoid third-party issues. Supports adopting a standardized complaint form or platform. NICTA should ensure consistency via quarterly checks with providers.	NICTA acknowledges Telikom's system and other providers' operational diversity. A single platform is not practical at this stage; instead, NICTA will set minimum standards in its Complaints Handling Guideline. Verification must not create barriers for vulnerable consumers. Quarterly engagement will be strengthened under the monitoring framework.
14		Telikom's response to the		

	Telikom Limited	Guideline on page 1, paragraph 4, Telikom Limited's response to the Second Stage of the complaints process; Acknowledgement & Initial Assessment	Has an advanced reporting system that registers faults, issues reference numbers, and suggests improving constant updates to customers.	NICTA commends Telikom's system and encourages all providers to issue prompt acknowledgment (within 24 hours) and provide regular updates at set intervals until resolution. Supports adding proactive update requirements in revised guidelines and quarterly reporting on acknowledgment, update frequency, and resolution rates.
15	Telikom Limited	Telikom's response to the Guideline on page 2, paragraph 1, Telikom Limited's response to the Third Stage of the complaints process; Preliminary Investigation	First-contact officers should be highly trained to resolve issues swiftly. Simple issues resolved in 10 minutes or less. Different timeframes for complaint types (e.g., billing disputes within 48 hours).	NICTA supports early resolution where possible, but not all complaints can be solved in 10 minutes. Will set tiered timeframes by complaint type (immediate, same-day, within 48 hours for complex cases) and require measurable service level targets and quarterly performance reporting.
16	Telikom Limited	Telikom's response to the Guideline on page 2, paragraph 2, Telikom Limited's response to the Fourth Stage of the complaints process; Escalation	Uses an internal escalation metric to resolve queries effectively at different levels.	NICTA supports transparent escalation procedures with clear timeframes and contact points for each level. May require licensees to submit escalation frameworks for review to ensure alignment with revised rules.
17	Telikom Limited	Telikom's response to the Guideline on page 2, paragraph 3, Telikom Limited's response to the Fifth Stage of the complaints process;	Harassment complaints require a search warrant before the legal team investigates. Cybercrime-related complaints follow a referral process.	NICTA understands legal constraints and agrees such cases must comply with warrant requirements. Reminds licensees to avoid unnecessary delays, coordinate between legal and operational teams, and follow referral processes for matters outside NICTA's jurisdiction.

		Full Investigation		
18	Telikom Limited	Telikom's response to the Guideline on page 2, paragraph 4, Telikom Limited's response to the Sixth Stage of the complaints process; Reporting & Recommendation	Current process is effective but needs improved internal communication.	NICTA supports internal coordination between legal, technical, and customer service units is essential. Encourages documenting workflows and sharing best practices in quarterly reviews.
19	Telikom Limited	Telikom's response to the Guideline on page 2, paragraph 5, Telikom Limited's response to the Eighth Stage of the complaints process; Follow-up & Monitoring	Recommends setting timeframes for troubleshooting at different levels. Supports fair and enforceable procedures to strengthen consumer rights.	NICTA supports setting clear timeframes for each troubleshooting stage to improve follow-up. Will incorporate these into the monitoring framework and require proactive tracking of complaint trends for continuous improvement.
20	NGCB	NGCB's response to the Guideline on page 1 Legal and Legislative Framework Sections 242 & 244, National ICT Act 2009	NGCB emphasizes the need for a clear step-by-step complaints process, statutory timeframes for acknowledgment, investigation, resolution, and appeals. Also recommends accessible guidance for consumers, periodic staff training, proactive monitoring, and well-defined enforcement mechanisms.	NICTA acknowledges the importance of a strong legislative foundation. The Guideline includes detailed procedures and statutory timeframes where applicable, provides clear guidance for consumers, ensures public reporting, and incorporates training, monitoring, and enforcement protocols to strengthen accountability and compliance.
21	NGCB	NGCB's response to the Guideline on page 1 to 2	NGCB recommends a uniform submission protocol with	NICTA supports standardization of submission protocols. Complaints are received through multiple

		Complaint Intake and Registration; Sections 9(f) & 9(i), National ICT Act 2009	standardized forms or digital platforms, multiple submission channels (phone, email, online, physical points), and mandatory verification to reduce incomplete or invalid complaints.	accessible channels, using standardized forms or digital platforms. Mandatory verification ensures accuracy and completeness. Providers maintain internal processes, but NICTA ensures escalated complaints follow a consistent framework.
22	NGCB	NGCB's response to the Guideline on page 2; Acknowledgment and Initial Assessment Industry best practice	NGCB proposes a 48-hour acknowledgment timeframe, follow-up confirmations, jurisdictional clarity, and priority classification (High, Medium, Low).	NICTA notes that a 24–48 hour acknowledgment is an industry standard guideline, not a formal requirement. NICTA clarifies jurisdictional boundaries and introduces priority classifications to ensure consistent handling based on urgency.
23	NGCB	NGCB's response to the Guideline on page 2; Preliminary Investigation Procedural stages & escalation	NGCB recommends statutory maximum time limits, service provider response obligations, and clear escalation protocols to prevent delays.	NICTA codifies maximum timeframes for procedural stages, defines provider response obligations, and standardizes escalation pathways to ensure timely handling.
24	NGCB	NGCB's response to the Guideline on page 2; Escalation Process Inter-agency coordination	NGCB suggests transparent tracking, enforceable follow-up, and clearly defined obligations and timelines for cases referred externally.	NICTA prioritizes transparent tracking, enforceable follow-up, and strengthens inter-agency coordination for escalated complaints.
25	NGCB	NGCB's response to the Guideline on page 2-3; Full Investigation Sections 242 & 244, National ICT Act 2009	NGCB recommends standardized evidentiary procedures, stakeholder engagement, and clear communication of findings including appeal rights.	NICTA ensures investigations comply with Sections 242 & 244. While statutory timeframes guide actions, NICTA allows flexibility for different complaint types and operational best practices. The Guideline balances regulatory oversight with practical ICT sector realities.
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	NGCB	NGCB's response to the Guideline on page 3; Full Investigation Complaint Resolution and Closure Section 256, National ICT Act 2009	NGCB emphasizes transparent communication of outcomes, detailed documentation, timelines, responsible entities, and legislatively defined appeals process.	NICTA supports transparent communication and thorough documentation. The Guideline integrates and expands the legislated appeals process under Section 256, ensuring accountability and safeguarding consumer rights.
27	NGCB	NGCB's response to the Guideline on page 3; Follow-up and Monitoring Industry best practice	NGCB recommends post-resolution follow-ups, performance-based KPIs, analytics to identify trends, robust feedback mechanisms, and continuous staff training.	NICTA strengthens follow-up and monitoring processes, including consumer satisfaction assessment, KPI tracking, analytics for trend identification, robust feedback systems, and continuous training for complaint-handling officers to ensure effective, transparent, and accountable management.