

Thursday 10th of July, 2025

Mr. Kila Gulo-Vui
The Chief Executive Officer
National Information and Communications Technology Authority (NICTA)
P.O. Box 8444
Boroko, NCD
Papua New Guinea

Dear **Mr. Gulo-Vui**,

**RE: SUBMISSION ON THE DRAFT CONSUMER PROTECTION RULES AND
GUIDELINES**

Telikom Limited is pleased to submit its response to the public consultation on the Draft Consumer Protection Rules and Guidelines issued by NICTA dated **16th May, 2025**. Our submission is structured in two parts:

1. Comments and recommendations on the **Draft Consumer Protection (Amendment) Rule 2025**; and
2. Responses to the consultation questions on the proposed **Consumer Complaints Management System**.

We appreciate the opportunity to participate in this consultation process and remain committed to supporting regulatory initiatives that promote transparency, fairness, and improved service delivery in the ICT sector.

Should you have any questions or require further clarification, please contact our Regulatory Manager, **Mr. Arua Taravatu**, on CUG mobile number **78880168**.

Yours Sincerely,
TELIKOM LIMITED



Amos Tepi, O.B.E
Acting Chief Executive Officer



***"TELIKOM LIMITED SUBMISSION – CONSUMER PROTECTION RULE
AMENDMENTS 2025"***

TLIKOM LIMITED SUBMISSION

CONSUMER PROTECTION RULE AMENDMENT 2025

Introduction

Telikom Limited wishes to sincerely thank the National Information and Communications Technology Authority (NICTA) for the opportunity to participate in this important consultation on the proposed amendments to the Consumer Protection Rule 2025. We appreciate NICTA's commitment to ensuring that consumer welfare remains central to the development and regulation of Papua New Guinea's telecommunications sector.

Our submission reflects Telikom's dedication to aligning with global consumer protection principles while considering the unique social, economic, and geographical challenges faced by consumers across PNG. We welcome this engagement as an opportunity to collaboratively improve the regulatory framework to better serve all Papua New Guineans in an increasingly digital world.

3.1 Informed Consumer Choice

3.1.1 Rights to full information on service choices and costs/prices

Telikom agrees with NICTA's position.

However, we suggest that this principle be further strengthened to reflect the realities of PNG's regulatory environment, particularly in remote and rural areas where digital literacy and access to printed or online information may be limited. In line with this, we propose that service providers be required to deliver key service and pricing information in *plain, culturally appropriate, and translated language formats* (e.g., Tok Pisin or other major local languages), where practicable.

3.1.2 Protection from Fraud, deceptive advertising, inappropriate sales technique

- **Provision to be included in Rule:**

Telikom may agree with the six provisions that are included. It is also appropriate for the best strategic interests of both customers and the service providers to include specialised skills/capacities in this regulatory section to boost customers' experiences that would foster reliability and transparency.

- ***Under Policy Number 1 – Prohibition of Plan or service activation /Deactivation without explicit Customer Permission, Telikom maintains a Lifecycle Policy whereby a SIM card is automatically returned to the inactive pool after a defined period of inactivity. This process helps ensure the network remains resilient and optimized for active subscribers. Hence if this Rule can be made flexible, allowing for exceptions based on specific circumstances***

3.1.3 Right to customer assistance with purchase and service options

- **Provision to be included in Rule:**

Telikom also agree with the rules.

However, the language usage should be friendly and non technical vocabulary, this is in order to safeguard customers right to services. It can easily promote **accessibility, fairness, and growth** in the Telecommunication Industry in PNG.

3.1.4 Consumer rights to access detailed information about billing and usage

Telikom Limited agrees with all the provisions outlined by NICTA under this section.

However, considering the regulatory and operational challenges within Papua New Guinea, such as limited digital literacy, network constraints in rural areas, and device accessibility, we believe that additional measures should be considered to make this right more effective in practice.

We recommend that operators be encouraged to provide billing and usage information through **various accessible formats**, including USSD codes, printed statements upon request, and user-friendly translations in Tok Pisin or other common local languages where appropriate. This will help ensure that consumers across all regions, regardless of location or education level, are able to understand and manage their service usage and associated costs. This approach will not only support greater transparency but also strengthen consumer confidence in the telecommunications sector.

3.2 Fair and Reasonable Pricing

3.2.1 Publicly available Tariff plans

However, we would like to highlight some practical regulatory challenges in the PNG context that may affect how effectively this principle is applied and understood by consumers. The specific regulatory challenges are Low Digital Literacy, Limited Access to Tariff Information, Inconsistent Messaging Channels Language Barrier

Most tariff plans are presented in English or in technical terms, which are hard for many Papua New Guineans to understand.

Example: Terms like “data throttling,” “auto-renewal,” or “validity period” may be unclear without proper explanation.

3.2.2 Affordable service pricing options

However, in order to achieve meaningful affordability, it is important to balance consumer needs with the cost of delivering services. In PNG, affordability is affected by a number of unique challenges including high infrastructure costs in rural areas, where towers, power,

and transport are expensive; Low population density which limits economies of scale fluctuating foreign exchange rates, which increase the cost of imported equipment and network upgrades; limited income levels of consumers, especially those in informal or subsistence economies.

3.2.3 Protection against “Bill Shock” including reasonable charges, price increases, bait-and-switch

Telikom Limited strongly supports the principle that consumers must be protected from unexpected or excessive charges, commonly known as “bill shock.” These situations often arise when users unknowingly exceed their usage limits, are automatically charged for services they did not intend to purchase, or face sudden price increases without proper notice.

3.2.4 Notification and assistance regarding price or usage changes

Telikom Limited supports NICTA’s position that consumers must be clearly notified of any changes in pricing or usage terms that affect their service.

However, this rule will require real-time monitoring of customer usage and changes in pricing, which will impact service providers network systems. We need to ensure that our system track usage accurately and send notifications quickly through SMS or other channels. It also means our billing and metering systems must be closely aligned with network data to allow accurate audits. These changes will increase the load on our network operations and may require system upgrades to handle the extra processing and ensure reliability.
(Comments incorporated from our graduates).

3.3 regulation of mobile data

3.3.1 Fair mobile data practices

Telikom Limited supports NICTA’s emphasis on fair mobile data practices that promote transparency, prevent misuse, and ensure consumers receive the full value of the services they pay for. Mobile data is a vital resource in today’s digital economy, and fair treatment of users is critical to building trust and improving digital inclusion.

To promote fair mobile data practices, Telikom recommends:

- Clear Labelling of Data Plans – use simple words (Tok Pisin if needed) to clearly explain data bundle sizes, expiry time, and how they work.
- Usage Transparency – Customers should receive real-time or near real-time data usage alerts (e.g., 50%, 80%, 100% thresholds).
- Auto-renewal Opt-In Only – Auto-renewals should be optional and only activated with clear customer consent.

- Disable Out-of-Bundle Charging by Default – Consumers should not be charged outside their bundle unless they manually opt in.

3.3.2 Mobile data network management

Telikom Limited agrees with NICTA that mobile network management should be done fairly, so all users can enjoy a good and stable connection especially during busy times.

However, network operators must manage how data is shared among users, especially when many people are online at the same time. But it must be done in a way that's fair, clear, and doesn't secretly block or slow down certain services. The common concerns in PNG are;

- Slow speeds at peak hours, but customers are not told why.
- Some apps or services load slower, without clear explanation.
- Customers don't know if their data is being "throttled" (slowed down) or why.

Telikom's Suggestions in response to the questions on regulation of Mobile Data;

- Be transparent – Customers must be clearly told when and how the network is managed (e.g., during busy hours, speeds may be slower).
- Treat services equally – Don't slow down certain websites or apps unless it's for safety or legal reasons.
- No secret limits – If a plan has speed or usage limits, that should be explained clearly before purchase.
- *Customers must be made aware of the back-ground Apps that runs automatically consumed data without customer knowing, this has noting to do with Service provider.*

3.4 Roaming, Switching Providers, and Portability

3.4.1 Roaming rules applicable to consumer protection

Telikom Limited agrees with NICTA that customers need to be protected when using mobile roaming services whether they travel overseas or go to areas in PNG where their own provider uses another network.

Roaming can lead to very high charges if people are not warned properly or do not understand how it works. Many Papua New Guineans may not know that their phone can automatically switch networks when they travel, or that using data overseas can cost much more than normal. For instance, a customer's mobile data is turned on during a trip overseas. Their phone starts updating apps in the background, and their prepaid credit runs out very fast without making a single call.

Therefore, Telikom Suggests the following;

- Let people choose to turn on or off roaming — especially data roaming — so they are not charged by mistake.
- Explain roaming charges in plain language (and Tok Pisin if possible), before the customer starts using it.
- Help customers control spending by letting them set limits (e.g., send alerts when they reach 80% of roaming usage).
- Tell customers when they roam locally inside PNG so they know what network they're using and if it affects their plan.
- *Educate customers that some major network overseas example Australia do not roam on 2G and 3G network hence moving overseas customers must have 4G compatible device*

3.4.2 Mobile number and data portability

Telikom Limited supports NICTA's intention to promote mobile number portability and data portability, as part of protecting consumer rights and promoting fair competition.

These rights help customers move freely between service providers without losing their contacts or starting from scratch — which encourages better service, more competition, and fairer prices.

However, there should also be a “fair cost maximization” regulatory framework to accommodate such network innovative developments into the existing network system that may encourage level playing field for service providers and increase user experiences in terms of portability.

3.5 Equitable Access and Treatment

Telikom Limited supports NICTA's goal to make sure that people with disabilities have fair and equal access to communication services — just like everyone else.

In Papua New Guinea, people living with disabilities (such as those who are blind, deaf, or have trouble moving or speaking) often face big challenges when trying to use phones, internet, or customer services.

3.5.1 Services and access support for persons with disabilities

However, Telikom suggests the following,

- Provide special customer support options (like SMS, email, or video help) for deaf or hearing-impaired users.
- Train staff in shops to respectfully help people with disabilities.

3.5.2 Vulnerable consumer support

- Promote awareness so that people with disabilities know what services are available to help them through stakeholders' accessible engagements like Church and LLG Wards.

3.5.3 Non discrimination, equal treatment of all customers

- Ensure fair pricing — Make sure they don't have to pay more just because they need extra help.

3.6 Service Disruptions

Telikom agrees with NICTA that customers must be informed quickly and clearly when there is a service disruption — like if the network goes down, there's no internet, or calls stop working. In Papua New Guinea, these types of problems can happen due to bad weather, power issues, cable cuts, or tower damage. When this happens, customers are often left confused or frustrated, especially if they don't know what's going on or how long it will take to fix.

3.6.1 Service disruptions and down time notifications

However, to maintain trust, it is equally important to:

- Apologise first and explain clearly what caused the issue and what is being done to fix it.
- *Service Notification are done manually if that can be automated and managed by a dedicated team to maintain customer experience and confidence*

3.7 Protection and Safety

Telikom Limited supports NICTA's inclusion of strong consumer protection measures under the theme of Protection and Safety. In an evolving digital environment — particularly with increased reliance on mobile services, online platforms, and emerging technologies — safeguarding users' personal rights, dignity, and data is critical. The following outlines our support and suggestions for each sub-section:

3.7.1 Protection of customer privacy, unauthorised use of data

- Collaborate with law enforcement (Police) and NICTA on complaint resolution procedures while respecting due process and privacy rights.

3.7.2 Protection from abuse, mistreatment

- NICTA may provide clear and confidential channels for customers to report harassment, threatening messages, or abuse.

- *To obtain confidential customer information from a provider by a Plaintiff, NICTA must establish a clear process to get this done.*

3.7.3 Data privacy and security in AI system

- AI-driven systems must comply with existing data protection laws and be audited regularly for bias, errors, or misuse.
- Adopt AI governance frameworks that prioritise fairness, data minimisation, and cybersecurity best practices.

3.8 Rules regarding use of artificial intelligence in customer services

Telikom supports NICTA's effort to anticipate these risks and recommends a cautious, rights-based approach to AI deployment.

3.8.1 Protection of customer privacy, unauthorised use of data

However, in an environment where enforcement resources are limited, there is a need for **simple, enforceable AI principles** that guide operators in maintaining ethical and privacy-conscious service delivery. Telikom encourages NICTA to issue AI-specific guidelines and codes of practice that reflect international standards but are grounded in the realities of PNG's digital economy, where consumer protection must evolve hand-in-hand with innovation.

3.9 Complaint and redress

Telikom Limited supports NICTA's focus on strengthening consumer rights by providing clear, fair, and enforceable procedures for complaint handling.

3.9.1 Procedures and criteria for filling complaints

Telikom agrees with the need for simple, accessible, and well-publicised procedures for customers to file complaints.

However, Telikom suggests following provisions to be considered also;

- Consumers must be **issued a tracking number or reference** for their complaint to ensure follow-up and transparency.
- NICTA should also provide an **escalation mechanism** for unresolved complaints.
- *Telikom Has internal Escalation Metric to handle unresolved customer complaints.*

3.9.2 Operator obligations for responding to and redressing complaints

Telikom supports clear regulatory standards that outline the **timeframes, responsibilities, and escalation steps** that operators must follow in handling consumer complaints.

However, Telikom suggested that:

- Operators must acknowledge all complaints within **48 hours** and resolve them within a reasonable timeframe (e.g., 7–14 days).
- Detailed records of all complaints and outcomes should be maintained for audit purposes and reported to NICTA.

3.9.3 Whistleblower protections

Telikom suggested that;

- NICTA should establish **minimum standards for whistleblower protection**, ensuring confidentiality and protection from retaliation.
- Operators should have an internal whistleblower policy and reporting mechanism.

Question on Complaint Redress

- *Telikom has an Operational Level Agreement (OLA) in place, under which all customer complaints are addressed within defined timeframes to improve turnaround times. Any unresolved issues are escalated to management for further intervention.*

3.10.1 Rule compliance and Monitoring

Telikom Limited supports NICTA's emphasis on enhancing **compliance and monitoring mechanisms** to ensure that all service providers adhere to the Consumer Protection Rules and Guidelines.

However, in Papua New Guinea context — where regulatory enforcement faces challenges due to limited resources, geographical constraints, and varying levels of operator compliance, it is essential to adopt a **practical and transparent monitoring approach**.

Telikom suggested that,

- It would be more conducive as NICTA'S Monitoring effectiveness can be strengthened by collaboration with **local ICT hubs, provincial government agencies**, and consumer rights organisations. NICTA itself can make the final decision.

**" TELIKOM LIMITED- PUBLIC CONSULATATION SUBMISSION
THE PROPOSED GUIDELINE FOR NICTA CONSUMER COMPLAINTS
MANAGEMENT SYSTEM"**

TELIKOM LIMITED- PUBLIC CONSULATATION SUBMISSION

THE PROPOSED GUIDELINE FOR NICTA CONSUMER COMPLAINTS MANAGEMENT SYSTEM

Introduction

Telikom Limited welcomes the opportunity to respond to the National Information and Communications Technology Authority (NICTA) on the **Proposed Guideline for Consumer Complaints Management System**. We commend NICTA's initiative in strengthening consumer protection and enhancing complaint handling standards in Papua New Guinea's ICT sector.

This submission provides Telikom's comments, feedback, and proposed recommendations to the questions on the draft guideline in accordance with the objectives of fair, transparent, and effective consumer redress mechanisms.

1. Complaint Intake Registration

- **What suggestions do you have for enhancing the complaint intake and registration process to ensure a more effective and consumer-friendly experiences?**
For effective fault reporting, consumer must provide all necessary requirements like faulty number Name, Location and two alternative contact numbers.
- **What minimum requirements should service providers follow when receiving and resolving complaints?**
Verifying the complainant on the system, if the correct person is reporting the faults. This is to avoid third party reporting causing confusion.
- **Should providers adopt a standardized complaint form or platform for submissions?**
Yes, Telikom Limited has the reporting system for fault reporting and submissions.
- **How can NICTA ensure consistency in complaints handling across different operators?**
Check with service providers quarterly.

2. Acknowledgement and Initial Assessment

- **How can the acknowledgement and initial assessment process be improved to enhance communication with complaints and ensure timely resolution of their issues?**
Telikom already has the advanced reporting system to register faults and give reference number to consumer, only need improvement on constant update to customer.

3. Preliminary Investigation

- **What measures do you recommend for enhancing the effectiveness of the preliminary investigation process in swiftly resolving complaints while ensuring thoroughness and accuracy.**
Ensure, officers at the first point of contacts are highly trained technically to swiftly resolve all issues.
- **What should be the maximum time frames for acknowledging, investigating and resolving complaints?**
This is done within ten minutes or less.
- **Should there be different timeframe based on the type of complaint (e.g. billing disputes vs. Service outages)?**
For Billing and Network queries it is with in 48 hours or less.

4. Escalation (if required)

- **How should parties receiving referred complaints manage and address these issues? We would appreciate insights on the proposed draft complaints handling management system and processes described under the draft system or related discussions on this topic them here.**
Telikom has followed up an Escalation Metrics to effectively resolve queries at different levels internally.

5. Full Investigation

- **What best practices or insights can you share to improve the effectiveness of the full investigation process, particularly in the areas of evidence collection, stakeholder interviews, and compliance assessments?**
In case of a harassment complaint, our process is to advise customer to provide Search Warrant. Then internal Legal Team will conduct investigation and advised action.

6. Reporting and Recommendation

- **How can the reporting and recommendation process be improved to ensure that investigation findings of the investigations are communicated effectively, and that the recommended actions are actionable and aligned with industry best practices?**
Telikom's current process is effective, only need internal communication process to improve.

7. (8.) Follow up and Monitoring

- **What strategies or methods do you recommend to enhance the follow-up and monitoring process, ensuring that resolutions are effectively implemented and that any emerging trends in complaints are addressed proactively?**
Telikom has existing process in place, however only improvement we will do is to establish a time frame for each dependency at different levels to carry out trouble shooting with in time frames.

"NICTA LETTER DATED 16TH MAY 2025"



Government of Papua New Guinea
National Information and Communications
Technology Authority

Office of the Chief Executive Officer

16th May 2025

Our Ref: CE15/511

Amos Tepi
Chief Executive Officer
Telikom PNG Ltd
Section 136, Allotment 17, Kumul Avenue
PO Box 1349
WAIGANI 131
National Capital District

Dear Mr. Tepi,

SUBJECT: Notification of Public Consultation on Draft Consumer Protection Rules and Guidelines

Reference to the recent public announcement in the nation's daily newspapers, and as part of our ongoing commitment to public participation and industry transparency, the National Information and Communications Technology Authority (NICTA) hereby advises your office of the commencement of a public consultation on the following draft instruments:

- **Draft Consumer Protection Rule Amendment 2024**, which is a vital revision of the existing Consumer Protection Rule 2014; and
- **Guideline on NICTA's Consumer Complaints Handling Process.**

These rules are designed to address emerging consumer issues, promote fairness, transparency, and accountability within the telecommunications sector. They aim to protect consumers' rights, improve service standards, and foster a competitive environment that benefits all users, especially as the industry evolves through digital innovation and increased connectivity. Implementing clear, effective rules is essential for building trust and ensuring sustainable growth in Papua New Guinea's digital landscape.

The public consultation process will officially commence on **Friday, 16th May 2025**, with the release of the Consultation Papers. It will run for four (4) weeks, closing on **Friday, 13th June 2025**. During this period, stakeholders—including consumers, industry players, and advocacy groups—are encouraged to review the draft instruments and provide written submissions. Submissions should be supported with appropriate evidence and data where possible and sent via email to consultation.submission@nicta.gov.pg. All submissions must be received by **5:00 PM on Friday, 13th June 2025**.

In addition to the written consultation process, NICTA may hold workshops to gather broader input from the general retail consumer population. Copies of the Consultation

Purima ICT Hubs, Section: 34, Allotment: 19 & 20, Corner of Frangipani & Croton Street | HOHOLA

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Paper and all draft instruments are available on NICTA's website at www.nicta.gov.pg. All submissions received will be published on NICTA's Public Register in accordance with subsection 229(3) of the Act, ensuring transparency and public accountability.

We invite your office and stakeholders to participate actively in this process—your insights are valuable in shaping a fairer, safer, and more innovative communication environment for Papua New Guinea's consumers.

For further information, please contact Mr. Polume Lume, Director of Economic, Consumer and International Affairs, at 3033227 or via email at plume@nicta.gov.pg. Your engagement in this consultation is vital for shaping effective policies that support industry growth and protect consumers' rights.

Yours Sincerely,



KILA GULO-VUI
CHIEF EXECUTIVE OFFICER