



12th December 2025

Mr. Polume Lume
Acting Chief Executive Officer
National Information and Communications Technology Authority
P.O. Box 8444
BOROKO 111
National Capital District
Papua New Guinea

Dear Mr Lume,

RE: CONSUMER PROTECTION RULE AMENDMENT ROUND 2 CONSULTATION

Digitec Communications Limited T/A Vodafone PNG welcomes the opportunity to respond to NICTA's Round 2 consultation on the updated Proposed amendments to the Consumer Protection Rule (Amendment) 2025 that was published on the NICTA website on 31st October 2025.

Vodafone PNG recognises that NICTA's intention is to respond to a wide range of consumer-related issues and concerns. Those growing concerns encompass costs, marketing practices, deceptive tactics, fair and equitable treatment, customer privacy, protection from abuse, and effective complaint resolution, among others. NICTA seeks to update and expand the 2014 Rule to address these issues and better protect consumer interests in the ICT sector.

Vodafone PNG wishes to highlight some concerns raised in Round 1 consultation that has not been adequately addressed in NICTA's responses and wishes to once again highlight the same in this Section A of this submission.

Further Vodafone PNG hereby provides its responses to Round 2 Public Consultation in Section B of this submission.

As a general consideration, Vodafone PNG once again highlights the two principles of effective regulation: (1) regulation should be carefully targeted on problems, and (2) regulations should be proportionate so as to deliver benefits that outweigh costs.

- **Targeting of regulations:** Vodafone PNG notes that NICTA has identified several consumer issues that are squarely within the remit of mobile service providers including Vodafone. However, other issues raised relate to the use of content services over Vodafone's network. NICTA will need to carefully consider the appropriateness of regulations that place obligations on network services suppliers relating to consumers' use of content services, and, generally, our view is that network services suppliers should not be held responsible for use of content.
- **Cost-benefit analysis:** Vodafone PNG encourages NICTA to carefully consider the costs and benefits of each of its proposals. Ensuring that consumer protection regulations undergo a rigorous cost-benefit assessment is crucial to achieving meaningful outcomes for both consumers and service providers. Without careful analysis, there is a risk that regulations may impose significant compliance costs on service providers while delivering minimal or even illusory benefits to consumers, such as when rules rely on consumer actions that may not occur in practice. Ineffective or poorly targeted regulations can not only fail to protect consumer interest but also create opportunity costs by crowding out the adoption of more effective measures.



Section A

First foremost Vodafone PNG is providing its comments to the Vodafone submission from Round 1, released by NICTA in the Response to Public Consultation issued on 27th October 2025 and published on the NICTA website.

1. Informed Consumer Choice

Provisions	Vodafone Comments 1 st Round Submission (27 th June 2025)	NICTA 1 st Round Responses (27 th October 2025)	Vodafone 2 nd Round Comments (12 th December 2025)
3.1.1 Information to be Provided by the Telecommunications Service Providers to Retail Customers, including clear and accurate information, and provision of usage data including an itemized 6-month usage history.	Vodafone PNG notes that: - Most information is provided to consumers via its website, where all information is readily available and updated on a timely basis. - Postpaid customers get an itemized bill every month. - Prepaid customers can obtain information on their transaction history on the My Vodafone App and can request some further details already from Vodafone. - Further Vodafone Prepaid Customer get an After Call Notification after Voice call to indicate the minutes and charges incurred. Threshold notification Alerts are sent out for Data Balance remaining. With respect to the six months of itemized transaction history, Vodafone believes that it would be far more	NICTA notes the concerns raised by Vodafone citing costs and benefit considerations wherein which case costs will be passed on to consumers. Nonetheless, NICTA notes that it is in line with global best practice to retain customer data from 6-months up to 2 years and to make customer data available on request to law enforcement authorities for the purpose of investigation, detection and prosecution of serious crime including terrorism and/or acquittals of innocent persons. All functions of consumer protection.	Vodafone PNG wishes to clarify that customer transactional data is retained in compliance with legal requirements and may be accessed by law enforcement agencies in accordance with applicable laws for investigative purposes. However, our response in Round 1 was intended to convey that Vodafone does not recommend making this data mandatorily available to customers online. Instead, it can be provided upon request at Vodafone retail touchpoints, subject to owner verification. Furthermore, Vodafone proposes that operators be permitted to recover a minimal cost for providing a 6-month transaction history, whether in print or electronic format, to verified customers at any Vodafone retail location, which is the practice in many countries for prepaid customers.



	practical and cost effective to provide one (1) month's data usage information. Vodafone notes that with increased reporting and services, costs will naturally go up and be passed onto consumers. In the absence of a clear benefits case for the additional data, Vodafone does not consider the benefits would outweigh such costs.		
3.1.1 Critical information summary	Vodafone PNG notes that it already provides a significant amount of information to consumers via its Website, USSD and My Vodafone App. It does not object to the provision of a "Critical Information Summary" to be provided to all customers. This should ideally be provided online and through posters, flyers etc in store.	NICTA shares Vodafone's view that it is already providing a significant amount of information to its consumers via multiple mediums as mentioned above. However, should provide CIS for products and services where necessary.	Vodafone PNG acknowledges NICTA's response and confirms that, if required, we can provide a Critical Information Summary through our digital platforms, including the website, USSD, and My Vodafone App. These platforms offer customers convenient, anytime access to essential information.
3.1.2 Protection from fraud, deceptive advertising, inappropriate sales techniques	Vodafone PNG does not generally object to the provisions but notes that: - Prepay customers will lose access to service plans if the SIM card expires and there is no recharge or top-up before expiry. This should provide an exception to the general protection proposed against service deactivation. - Vodafone PNG does not consider that there should be a requirement for a mandatory inclusion of price per MB of data in advertisements. The reason is that it is complex particularly due	NICTA agrees with Vodafone's comments and will amend the provision to allow for exceptions for service deactivation and the mandatory inclusion of price per MB of data in advertisements to be out of bundle standard rate per MB.	Vodafone PNG acknowledges and appreciates NICTA's consideration on this matter. Since the price per MB varies across different plans and may change during promotional periods, it should either be avoided or presented as a range. We recommend that the value proposition of each plan be clearly communicated, including details such as plan price, included minutes, SMS, and data allowances.



	to the widespread use of bundled voice/data plans. It would be possible to provide an online tool for customers to calculate an estimated of the price per MB. Vodafone PNG considers that most customers would already know how much data is included in the plan as per the subscription chosen via USSD or My Vodafone App.		
3.1.4 Customer's right to access detailed information about billing and usage, including: • Data Usage Alerts and Notifications • Detailed Bill Breakdown • Credit and Debt Management	Vodafone PNG does not agree that it should be required to offer spend management tools, including offline options. Vodafone PNG accepts that consumers may benefit from such information, but this is better handled by independent consumer protection agencies. Operators can suggest plans/propositions based on user requirements, which is the current practice. With respect to detailed bills, this is provided for post-paid services but bills for pre-paid services itemized bills are not provided, however usage and balance details are available. Detailed and itemized bills can be provided if required subject to a further charge (other than what is provided on the My Vodafone App). This is a typical arrangement for mobile operators in other jurisdictions.	NICTA will consider Vodafone's comments.	Vodafone PNG notes and appreciates NICTA's consideration.



2. Fair and Reasonable Pricing

Provisions	Vodafone Comments 1 st Round Submission (27th June 2025)	NICTA 1 st Round Responses (27th October 2025)	Vodafone 2 nd Round Comments (12th December 2025)
3.2.1 Publicly available tariff plans	Vodafone PNG publishes all of its standard or 'above the line' tariff plans. Vodafone PNG does offer some customised below the line plans to larger corporate customers, which should be exempted from such tariff filing to promote competition through discounting.	NICTA agrees and will consider Vodafone's comments.	Vodafone PNG notes and appreciates NICTA's consideration.

3. Regulation of Mobile Data

Provisions	Vodafone Comments 1 st Round Submission (27th June 2025)	NICTA 1 st Round Responses (27th October 2025)	Vodafone 2 nd Round Comments (12th December 2025)
3.3.1 Fair mobile data practices	Vodafone PNG offers options to manage data usage and costs, through the My Vodafone App. Alerts are provided when usage has reached 80% of the limit. Vodafone's outside bundle rate for Data is the most affordable in the PNG market. This can be validated through independent studies of data pricing in the market and customers are well aware of how this works.	No responses provided by NICTA.	Vodafone PNG seeks a response. We feel this is sufficient.



4. Roaming, Switching Providers, and Portability

Provisions	Vodafone Comments 1 st Round Submission (27th June 2025)	NICTA 1 st Round Responses (27th October 2025)	Vodafone 2 nd Round Comments (12 th December 2025)
3.4.1 Roaming rules	Generally speaking, roaming arrangements are agreed at a wholesale level between carriers, so that it is difficult to provide customers with control other than directly via the handset. Billing for certain services is not real time and hence it is not possible to provide real time usage and balance information. This is a global practice. Vodafone PNG provides Roaming plans that are based on quotas allocated to avoid Bill shock. Customers should be fully aware of their Voice, SMS & Data allowance upon subscription to a roaming limit and can view usage and balance information on the App (for services which are real time). Vodafone provides clarity on how to subscribe to Roaming Plans. Roaming is not charged unless prior consent to subscribe is obtained and so customers would normally be aware of usage criteria. Vodafone PNG suggests that provision of information as to how roaming works, including notifications and control using the phone's operating system, can and should be provided by providers on its website and through account managers for Business customers and Customer Care for Prepay customers.	NICTA agrees with Vodafone's comments that service providers should provide roaming information in this manner.	Vodafone PNG notes and appreciates NICTA's consideration.



3.4.2 Mobile number and data portability	While Vodafone PNG would be very pleased with the introduction of MNP, Vodafone notes that this has not been progressed and so it is not possible to comply with such rules. NICTA has run public consultations on MNP, and the Industry awaits the outcome and way forward. NICTA should also be aware that termination penalties are a standard practice where they result from early termination of a contract for service and Vodafone PNG has incurred upfront costs which are recovered over the life of the contract. This is also a standard global practice. Customers always have an option to sign up on a non-contractual plan.	NICTA notes and will consider Vodafone's comments.	Vodafone PNG notes and appreciates NICTA's consideration.
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5. Equitable Access and Treatment

Provisions	Vodafone Comments 1 st Round Submission (27th June 2025)	NICTA 1 st Round Responses (27th October 2025)	Vodafone 2 nd Round Comments (12th December 2025)
3.5.1-3.5.3 Disable, vulnerable customer support and equal treatment of customers	Vodafone PNG understands NICTA's desire to provide for equal treatment of customers, including for those that are vulnerable or disabled. However, there are certain limits as to what Vodafone can achieve in a cost effective manner. In particular, Vodafone notes that rules relating to provision of services to all regions including remote and underserved areas is contingent on other Government policies such as the release of low-band	NICTA notes and will consider Vodafone's comments.	Vodafone PNG notes and appreciates NICTA's consideration.



	(900MHz) spectrum which Vodafone has sought to efficiently expand its coverage.		
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6. Service Disruptions

Provisions	Vodafone Comments 1 st Round Submission (27th June 2025)	NICTA 1 st Round Responses (27th October 2025)	Vodafone 2 nd Round Comments (12th December 2025)
3.6.1 Services disruptions and downtime notification	Vodafone PNG considers that: - It reasonable to introduce rules regarding notifications on known service disruptions. Vodafone keeps its customers in the impacted areas informed through SMS blasts and Social Media channels enabled for Customer Interaction and Awareness. - Any requirements regarding compensation should be closely targeted to situations where Vodafone is the cause of the service disruption and provide for exceptions where the cause is not within Vodafone's control. Vodafone notes that it is dependent on other service providers to provide service continuity (e.g. DataCo) including continuity of electricity supply. It is also unclear what arrangements should apply when Vodafone's equipment is the subject of vandalism. An example of the challenges in delivering service continuity is the ongoing DataCo Terrestrial fiber cuts which come at a significant cost in terms of poor customer experience and revenue loss which is further	NICTA agrees with Vodafone's views that any requirements regarding compensation should be closely targeted to situations where Vodafone is the cause of the service disruptions and provide for exceptions where the cause is not within Vodafone's control.	Vodafone PNG notes and appreciates NICTA's consideration.



	compounded by the high cost of operating Cell Tower sites in the Highlands and Momase regions.		
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7. Protection and Safety

Provisions	Vodafone Comments 1 st Round Submission (27th June 2025)	NICTA 1 st Round Responses (27th October 2025)	Vodafone 2 nd Round Comments (12th December 2025)
3.7.1 Protection and safety, including customer privacy and confidentiality rules	Vodafone PNG has procedures in place to protect personal information. Information on best practices for avoiding unauthorised access to the customer's account via the customer's actions can be shared freely, for example on Vodafone's website or the My Vodafone App. Vodafone should not be held accountable where it has made reasonable attempts to inform consumers about the protection of their own data. Internet data security solutions are available for customers to purchase to protect them from privacy breaches but cannot not guarantee this. NICTA can also participate in providing privacy awareness to customers.	No responses provided by NICTA.	Vodafone PNG seeks a response.
3.7.2 Protection from abuse and mistreatment	Vodafone PNG has no insight into content used to bully or abuse, as it does not control or filter content by users and practices net neutrality by not prioritising or de-prioritising any particular content.	NICTA notes Vodafone's comments, however, points out that service providers have complete control over communications occurring on their network SMS and call times and duration hence can prevent abuse by blocking or deactivating telecommunication service of the source	Vodafone PNG reiterates that any call or SMS blocking should only occur following intervention from the relevant authorities. Customers should not be able to request such blocking without proper legal consent or due process being followed. This responsibility should rest with designated bodies such



	It would be advisable for NICTA to work with relevant authorities to strengthen laws to address Cyber Bullying or similar.	of the abusive communications where it is reported by the victim and verified by the service provider.	as the Cybercrime Unit, Police or the Judiciary, which must assess, investigate, and authorize service providers to implement blocking through a court order.
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8. Use of Artificial Intelligence in Customer Services

Provisions	Vodafone Comments 1 st Round Submission (27th June 2025)	NICTA 1 st Round Responses (27th October 2025)	Vodafone 2 nd Round Comments (12th December 2025)
3.7.3. Data privacy and security in AI systems	Vodafone PNG supplies network services not AI services. Service Providers provide connectivity and do not have control over access to allow customer content to be shared to AI systems on the Internet. Consequently, such rules are better directed towards service providers (OTT or hyper-scalers). Customer interaction with third party applications is beyond Vodafone's control and it cannot be held responsible for data use by AI systems.	The provision relates to service providers using AI systems to enhance their services or provide other functions of their services to customers where in such instances, they (service providers) should be able to have control of the AI systems functionality used relative to customer data protection. NICTA will amend the provision to clarify this.	Vodafone PNG notes NICTA's response and appreciates NICTA's consideration.
3.8 Rules regarding use of AI in customer services	Vodafone PNG is considering use of AI and agrees that it is reasonable to provide some protections relating to the use of AI in customer service functions, although there should be a clear case that there are particular problems that have emerged or would be likely to emerge with greater use of AI. Vodafone agrees that AI systems are used, we will adopt industry best practices and all	NICTA agrees with Vodafone's comments and notes that the same practice should apply above to 3.7.3 Data Privacy and Security in AI Systems.	Vodafone PNG notes NICTA's response.



Provisions	Vodafone Comments 1 st Round Submission (27th June 2025)	NICTA 1 st Round Responses (27th October 2025)	Vodafone 2 nd Round Comments (12th December 2025)
	information on how AI is used should be clearly available on its website and/or App. Vodafone is willing to work with NICTA to ensure that the platforms do not pose privacy issues and so that customers will be aware of the pros and cons of the AI platform being made available.		

9. Complaint and Redress

Provisions	Vodafone Comments 1 st Round Submission (27th June 2025)	NICTA 1 st Round Responses (27th October 2025)	Vodafone 2 nd Round Comments (12th December 2025)
3.9 Complaint and redress	Vodafone PNG confirms that it would be in compliance with the proposed Rules. Vodafone notes that, while complaints are inevitable, Vodafone takes its customer service obligations seriously and is a core part of its competitive differentiation to other suppliers. For example, Vodafone provides a 24 x 7 Call Center that has agents able to assist customers. Our customer care supports communications in English and the top 2 Local Languages (Tok Pisin & Hiri Motu). NICTA also asks about its role in addressing complaints. In Vodafone's view, NICTA's role should be to look into those customer complaints that are referred to it by the ICCC. The ICCC is the state body that is responsible	No responses provided by NICTA.	Vodafone PNG seeks a response.



	for handling Consumer Complaints and Enquiries. NICTA also has a possible role in policy making that guides the work ICCC do if there are complaints related to a NICTA licensed service provider.		
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10. Compliance

Provisions	Vodafone Comments 1 st Round Submission (27th June 2025)	NICTA 1 st Round Responses (27th October 2025)	Vodafone 2 nd Round Comments (12th December 2025)
3.10 Compliance	Vodafone PNG understands the need to ensure compliance with the proposed regulations. However, Vodafone also considers that it is important for service providers to be able to address conduct prior to the issue of sanctions including fines. We take customer complaints very seriously as we see this as an opportunity to drive continuous excellence. Fines are appropriately limited to serious or unaddressed poor conduct.	No responses provided by NICTA.	Vodafone PNG seeks a response.



Section B

In Addition to the Vodafone PNG's comments in Section A of this paper, NICTA is requested to consider our following responses to Round 2 Consultation, released by NICTA in the Response to Public Consultation issued on 31st October 2025 and published on the NICTA website.

Consultation Questions

Part 2 – Consumer Rights and Licensee Obligations	
Question	Vodafone PNG Comments on Draft Consumer Protection (Amendment) Rule 2025
Are the requirements for informational provision and Critical Information Summaries (CIS) practical and sufficient to ensure consumers are well informed?	Vodafone PNG notes that it already provides a significant amount of information to consumers via its website, USSD and My Vodafone App. It does not object to the provision of CIS but reiterates that this should be provided online and through posters, flyers in store. Provision of such information online is sufficient to ensure consumers are well informed and this is generally the common practice in other markets.
Do the proposed restrictions on misleading advertising and unauthorized service changes provide adequate consumer protection without creating unnecessary compliance burdens?	Vodafone PNG makes all efforts to ensure that any terms and conditions for the services provided is adequately made available to access in all its advertisements with the inclusion of terms and conditions. The terms and conditions are also made available on the Website and referred to in the advertisements. Vodafone PNG also wishes to highlight for effective marketing and advertisements; there will be a need to include fine prints which is still readable (in comparatively smaller font size) then the key messages in the advertisement content. This is consistent with international practices and Vodafone Standard Branding Guidelines being followed. As per Section 10.4.4 of the updated Draft Consumer Rule 2025 on Page 7, Vodafone PNG requests that NICTA also consider Website as another medium to provide Notice to customers for any changes to Service Features, Pricing or Contract terms.



Part 3 – Fair Pricing and Billing		
Question	Vodafone PNG Comments on Draft Consumer Protection (Amendment) Rule 2025	
Will the proposed spend-management tools and usage alerts effectively reduce “bill shock”?	Vodafone PNG had opposed the obligation for Service provider to offer Spend Management Tool in Round 1 Consultation and maintains its position on this. Vodafone provides customers with Usage Notifications to show their Data Allowance and the additional ad-hoc data cost as well. Vodafone PNG view is to ensure that the services and plans offered will have sufficient advertisement and Critical Information summaries that enables Customers to analyse what is best for them. Our website has information of price of plans, included value, terms and conditions, which is simple and easy for customers to understand). NICTA to note that customers also look at other factors besides pricing to determine what is best for them. The information on the website provides sufficient information for customers to decide which plan would suit them best based on their selection criteria. Vodafone further provides a 24 x 7, free call line for any customer to discuss and understand what plans would best fit based on their spend and services they require. In our view this is sufficient versus investing into Spend Management Tool which can be very subjective to various customer segments. Most users are prepaid and are aware of how the prepaid system works and for postpaid customers, they would generally have comprehensive discussions with their account managers to understand plans, terms and conditions and based on analytics, understand what would be best to suit their requirements.	
Is a phased implementation of itemized billing appropriate to balance consumer rights and operator costs?	Vodafone PNG wishes to emphasize that itemized 6 month history should only made available upon request of the customer upon ID verification in person. If this is required to be provided in electronic format, then Service Provider to utilize other KYC verification checks to avoid any abuse and identify theft situations. On Demand request handling is considered not to be cost intensive to the Service Provider. For postpaid, Vodafone already follows what is captured in the draft regulation.	

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Part 4 – Contracts and Service Agreements	
Question	Vodafone PNG Comments on Draft Consumer Protection (Amendment) Rule 2025
Are the 7-day cooling-off period and rules on contract renewal/termination fair and workable for both consumers and providers?	Vodafone PNG has no objections to the 7 day cooling off period, so as long as there is no abuse. Vodafone recommends putting a limit to ensure that Customers do not sign up and invoke cooling off period repeatedly in a month or predefined period. This generally should be applicable on new contracts and not renewals, as customers would have already experienced the services.
Do the restrictions on unfair contract terms align with best practice and industry realities?	Vodafone PNG objects to the clause which imposes the restriction to add the following to customer contracts “Terms that allow the licensee to unilaterally change the price or key features of the service without the consumer’s consent, except where, permitted under relevant clause.” In Section 12.3.1 a) Page 16 of the updated Draft Consumer Rule 2025 Service Providers must be permitted to change price or tariff with a 30 day Notice period to the customer, which is also consistent with international practices. Vodafone PNG however agrees that a licensee/Service provider must file that tariff plans with NICTA promptly before introduction or change of tariff plan as per Section 11 on Page 13 of the updated Draft Consumer Rule 2025.

Part 5 – Mobile Data and Roaming	
Question	Vodafone PNG Comments on Draft Consumer Protection (Amendment) Rule 2025
Are the requirements for roaming notifications and caps proportionate and feasible to implement?	Vodafone PNG does not activate roaming automatically for postpaid customers; it is only enabled upon the customer’s request. For prepaid customers, roaming is enabled by default, but they retain full control to manage this feature. In terms of notifications, consistent with global industry practice, most operators, including Vodafone PNG provide SMS alerts to customers when they begin roaming on a network outside their home country. For postpaid customers, they can have roaming pre activated or subscribe via USSD or My Vodafone App. Given current technology limitations, SMS remains the most practical and reliable method for notifying customers about roaming activation and subscription options.



	All other roaming details should be accessed by customers through the website or mobile app prior to travel or via alternative internet connectivity. While SMS notifications have certain limitations, they remain the most practical and effective method for delivering essential roaming information currently. To prevent potential bill shock, roaming is not enabled by default for postpaid customers, and this is clearly communicated during the signup process. Postpaid customers may choose to enable roaming with predefined quotas for voice, SMS, and data usage. These quotas represent the agreed limits for billing should the customer activate roaming while traveling internationally. NICTA should also note that roaming arrangements vary between operators, and roaming will not function unless agreements are in place with operators in the destination country. Vodafone PNG publishes a list of countries where roaming is available on its official website for customer reference. For prepaid customers, a cap limit does not apply, as usage is determined by the actual available credit balance. Roaming charges will be deducted based on the published rates listed on the Vodafone PNG website. For Postpaid customers, Roaming Cap Limit is set in consultation with the Customer. Vodafone PNG further advises that customers have the option to keep data roaming disabled on their mobile device, ensuring they do not incur any charges for receiving SMS. However, making or receiving voice calls while roaming will remain chargeable.
Will the proposed obligations on data usage transparency sufficiently empower consumers?	Vodafone PNG currently provides customers with real-time visibility of their remaining data balance and usage for any subscribed data bucket, whether postpaid or prepaid. This information is accessible through the My Vodafone App and can also be checked conveniently via USSD. As outlined in Section 13.1 on pages 18 and 19 of the updated Draft Consumer Rule 2025, Vodafone PNG applies traffic shaping only under exceptional circumstances, specifically during infrastructure-related outages such as fiber breaks affecting service providers that rely on DataCo fiber. In such situations, operators may need to implement traffic shaping protocols to maintain service continuity, albeit at a reduced capacity, utilizing the minimum backup resources available. Vodafone PNG believes that a Fair Usage Policy (FUP) should apply to all data users. We recommend that all operators be permitted to establish and publish their own FUP, consistent with global best practices. A FUP helps maintain network integrity and prevents activities that could strain resources, such as continuous peer-to-peer file sharing or fraudulent use by a few at the expense of majority of the users.



Part 6 – Vulnerable Customers	
Question	Vodafone PNG Comments on Draft Consumer Protection (Amendment) Rule 2025
Are the proposed provisions for persons with disabilities, elderly consumers, and rural/low-income groups sufficient to ensure equitable access?	Vodafone PNG strives to provide differentiated services for persons with disabilities wherever possible. However, there are practical limitations to what can realistically be delivered. For example, we may not be able to offer large-print materials, braille, or video relay services, but despite these constraints, our staff take the time to explain products and services thoroughly to ensure that all customers are well informed and fully understand their options before making a purchase or subscription decision. We would like to emphasize the critical importance of ensuring fair and equitable spectrum allocation. In our view, matters such as fair and equitable spectrum allocation have the potential to deliver far-reaching benefits for connectivity and accessibility, including to persons with disabilities and especially person living in more remote and rural areas. The current lack of access to the 900 MHz spectrum significantly limits Vodafone PNG's ability to extend services to rural and low-income communities. This spectrum is critical for delivering wide-area coverage and affordable connectivity, which would enable us to provide equitable access comparable to what is available in urban areas. Addressing this gap is essential to achieving inclusive digital participation across Papua New Guinea.
What additional measures, if any, should be considered to protect vulnerable consumers??	Vodafone PNG supports the measures outlined in the updated Draft Consumer Rule 2025 during Round 2 of the public consultation as best practices; however, we believe they should not be mandated. We also recommend that NICTA considers NICTA or government funding support to facilitate the implementation of some of these provisions, enabling their rollout across the entire industry.
Part 7 – Quality of Service	
Question	Vodafone PNG Comments on Draft Consumer Protection (Amendment) Rule 2025
Do the proposed minimum service standards reflect achievable and measurable benchmarks in PNG's ICT environment?	Vodafone PNG reiterates the critical need for fair and equitable spectrum distribution. The absence of access to the 900 MHz band significantly limits our ability to deliver services to rural and low-income communities, thereby restricting equitable access compared to metropolitan areas. For effective signal strength and coverage, lower-band spectrum is particularly essential. Also, we submit that these minimum standards should not form part of the regulation, as there are many outstanding matters such as infrastructure sharing, availability of UAS towers, fair and equitable spectrum distribution, mobile number portability, interconnect rates determination, etc that are yet to be finalized.



	Vodafone PNG does not agree with the mobile internet speed requirements specified in Section 16.1.2, item 2. Generally, the average 4G (LTE) mobile internet speed ranges between 20–30 Mbps for downloads and 5–15 Mbps for uploads. Achieving higher speeds requires adequate spectrum allocation for LTE. Vodafone PNG has already submitted feedback to NICTA during the July 2025 public consultation on the 'Draft Spectrum Outlook and Roadmap 2025–2030. Beyond spectrum allocation, several other factors significantly influence the speed and performance of a 4G LTE network. During peak usage periods, shared bandwidth among multiple users can lead to slower speeds. Signal strength also plays a critical role; physical obstructions, type of material used in construction of buildings, distance from cell towers, and environmental interference can degrade connectivity. Device capabilities matter as well, since older handsets may not support advanced LTE features such as carrier aggregation, which combines multiple frequency bands to boost throughput. Network infrastructure elements like tower density, backhaul capacity, power, optimization technologies and higher order modulation schemes directly impact overall performance. Geographic location also plays a role, for instance rural or remote areas and users on the edge/fringe typically experience slower speeds due to lower tower density and limited backhaul capacity, impacting overall user experience. Therefore, we submit that these should be excluded from the regulations and operators could publish typical speeds in consultation/testing with NICTA. Vodafone PNG recommends revising Section 16.9.1(b) on page 33 of the updated Draft Consumer Rule 2025 to apply specifically to significant equipment or software upgrades across network-wide infrastructure that impact more than 80% of customers, rather than service disruptions caused by common faults such as power failures, equipment malfunctions, or vandalism of existing infrastructure. This approach ensures that customer feedback is more meaningful, reflecting improvements resulting from major upgrades or enhancements.
Part 8 –Data Protection and Privacy	
Question	Vodafone PNG Comments on Draft Consumer Protection (Amendment) Rule 2025
Are the obligations regarding data security, transparency, and breach notification adequate and enforceable?	Vodafone PNG is supportive of the measures currently covered in the updated Draft Consumer Rule 2025 in Round 2 Public consultation.



Do the provisions on AI transparency and fairness strike the right balance between innovation and consumer protection?	Vodafone PNG supports the measures outlined in the updated Draft Consumer Rule 2025 during Round 2 of the public consultation and submits that these should be treated as best practices and not necessarily mandated. However, we believe that the widespread adoption and benefits of AI will materialize more significantly over the next 3-5 years, and for the benefit of users. At present, given the gap in mobile penetration in the country, the priority should be to address fundamental challenges and ensure greater connectivity and accessibility for the population in PNG.
Part 9 – Scam and Abuse Protections	
Question	Vodafone PNG Comments on Draft Consumer Protection (Amendment) Rule 2025
Will the proposed obligations on scam detection, blocking, and consumer awareness campaigns effectively reduce fraud and harassment?	Vodafone PNG believes that consumer awareness is an ongoing, iterative process, and NICTA should consider initiatives that reach grassroots levels, especially promoting responsible internet use which should be integrated into academic institutions, with support from the relevant authority or ministry responsible for school and university curriculum. Customers also share the responsibility for using the internet responsibly. In alignment with net neutrality principles, operators have implemented industry best practices to ensure fair and transparent access for all users. While Vodafone PNG supports obligations related to scam detection, blocking, and consumer awareness campaigns as effective measures to reduce fraud and harassment, we recognize that this is a sensitive and complex issue. Therefore, such obligations should be aligned with existing judicial processes to safeguard the integrity of both the system and the enforcement framework.
Are the proposed codes of conduct for staff and agents sufficient to prevent coercive practices?	Vodafone PNG does not see the topic related to “codes of conduct for staff and agents” captured in the updated Draft Consumer Rule 2025 in Round 2 Public consultation.
Part 10 – Complaints and Dispute Resolution	
Question	Vodafone PNG Comments on Draft Consumer Protection (Amendment) Rule 2025
Are the proposed timeframes for complaint handling reasonable and sufficient to ensure fairness?	Vodafone PNG is supportive of the timeframes for resolution captured in Section 19.3.2 on Page 42 of the updated Draft Consumer Rule 2025



Do the escalation pathways to NICTA or independent arbitration provide adequate remedies for consumers?	Vodafone PNG is supportive of the process in Section 19.4 on 43 to 45 of the updated Draft Consumer Rule 2025
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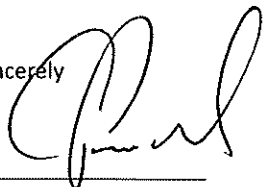
Part 11 – Compliance and Enforcement	
Question	Vodafone PNG Comments on Draft Consumer Protection (Amendment) Rule 2025
Are the proposed monitoring, reporting, and penalty mechanisms effective in ensuring compliance?	Vodafone PNG is supportive of the measures currently covered in the updated Draft Consumer Rule 2025 in Round 2 Public consultation.
What transitional arrangements would best support the industry in implementing the new Rule?	Vodafone PNG recommends initiating a dialogue with all operators to review the provisions of the proposed new rule, ensuring clarity and practical implementation. It is essential that any changes serve the best interests of all stakeholders and deliver meaningful outcomes that benefit most customers. Any new obligations introduced under the 'Consumer Protection (Amendment) Rule 2025' be implemented in phases, allowing service providers up to 12 months to achieve compliance. This timeline is essential as several changes will require significant investment in products, systems, processes, etc as well as comprehensive personnel training.

J.K.

Vodafone PNG requests that the comments/feedback in this submission is considered by NICTA. We understand that the 2nd is the final round of Public Consultation however requests NICTA to consider a closed group review for Operators or Service Providers to provide any final comments to the 3rd release of the Draft Consumer Protection (Amendment) Rule 2025 upon conclusion of the Round 2 Public Consultation process.

For any queries to Vodafone regarding this submission, please contact, Mr. Ateen Kumar through email on ateen.kumar@vodafone.com.pg or cell phone (675) 81100008.

Sincerely

A handwritten signature in black ink, appearing to be 'Pradeep Lal', written over a horizontal line.

Pradeep Lal
Regional Chief Executive Officer