

21 April 2020

Digital Platforms Branch Australian Competition and Consumer Commission

Sent by email to: AdTechInquiry@accc.gov.au

Dear ACCC,

## Ad Tech Inquiry

Thank you for the opportunity to comment on the ACCC's Ad Tech Inquiry. As part of the Inquiry, the ACCC may wish to consider whether certain complaints about digital advertising services could be handled by an independent ombudsman scheme.

The ACCC's Digital Platforms Inquiry final report recommended that an independent ombudsman for digital platforms be established. I support the ACCC's view that my office take on this role, as well as the Government's subsequent policy position that a digital platform ombudsman (DPO) pilot be developed.

Digital platform users appear to have limited pathways to resolve complaints. There are currently no formalised accessible resolution pathways to help resolve a digital advertising complaint where a digital platform's internal dispute resolution process has failed.

A DPO could handle complaints from small businesses about the performance and billing of digital advertising services. For instance, small businesses who:

- say they have been misled or misinformed about the digital advertising they pay for, or
- have difficulties independently measuring their advertising spend and verifying the performance of their ads on Google and Facebook.

I look forward to the outcome of the Ad Tech Inquiry and to working with the Government, regulators and other stakeholders to implement a DPO pilot scheme.

Regards

Judi Jones

Telecommunications Industry Ombudsman

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