

10 March 2020

Communications Team  
Human Rights and Technology Project  
Australian Human Rights Commission

By email: [communications@humanrights.gov.au](mailto:communications@humanrights.gov.au)

Dear Communications Team

**Human Rights and Technology Project**

I welcome the opportunity to comment on the Australian Human Rights Commission's Human Rights and Technology Project and support the Commission's considered approach to this important conversation.

As Australia's use of Artificial Intelligence (AI) applications increases, so does the need for effective regulation. An AI Safety Commissioner would provide a crucial role in setting a clear consumer protection framework. I support this proposal as a framework would provide clarity in complaint handling.

I would like to see the Commission's general principles for ethical and accountable AI decision-making further examined and implemented across all industries, including the telecommunications sector.

My office already receives complaints from consumers about AI applications, such as automated systems. Some consumers tell us they called their phone or internet provider for assistance, but had difficulty navigating an automated system and were unable to find a pathway to speak with a person.

Given the types of complaints we already see, as more telecommunications providers move to using AI for consumer engagement, we anticipate issues where automated services are not accessible to people who are disadvantaged, vulnerable or have a disability. Inclusive AI is needed to ensure these consumers are appropriately assisted.

I look forward to reading the Commission's final report later this year and engaging with the Commission further as this discussion continues.

Yours sincerely



Judi Jones,

**Telecommunications Industry Ombudsman**