



**Malaysian Communications and Multimedia Commission**  
Suruhanjaya Komunikasi dan Multimedia Malaysia

## **Public Inquiry Report**

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Review of the Commission Determination on  
the Mandatory Standards for Quality of  
Service (Content Applications Services)  
Determination No. 4 of 2002

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**1 April 2026**

This Public Inquiry Report is prepared in fulfilment of Sections 61 and 65 of the  
Communications and Multimedia Act 1998.

# Content

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<b>1.</b>	<b>Summary of the Public Inquiry .....</b>	<b>3</b>
1.1	Introduction.....	3
1.2	Public Inquiry Exercise.....	4
1.3	Structure of the PI Report .....	5
<b>2.</b>	<b>Public Inquiry Input and the Commission’s View .....</b>	<b>6</b>
2.1	Interpretation in the Mandatory Standards.....	6
2.2	General Requirements for Record Keeping and Report Submission .....	14
2.3	General Obligations.....	18
2.4	Standard on Service Availability .....	23
2.5	Standards on Billing Related Complaints .....	28
2.6	Standard on Non-Billing Related Complaints.....	33
2.7	Standard on Customer Complaints Resolution Time .....	37
<b>3.</b>	<b>The Way Forward .....</b>	<b>42</b>

## **1. Summary of the Public Inquiry**

### **1.1 Introduction**

1.1.1 The new Commission Determination on the Mandatory Standards for Quality of Service (Content Applications Service) and the Revocation of the Commission Determination on the Mandatory Standards for Quality of Service (Content Applications Services), Determination No. 4 of 2002 is introduced to strengthen the regulatory framework in line with current industry practices, establish clearer obligations, enhance customer protection, improve transparency, support fair and consistent service delivery and promote responsible industry practices.

1.1.2 The proposed standards aim to further reinforce customer protection by improving the efficiency, timeliness and responsiveness of complaint resolution, while ensuring that regulatory standards remain aligned with established best practices as well as prevailing service performance benchmarks within the evolving content delivery ecosystem.

1.1.3 Key elements of the proposed Mandatory Standards include:

- (a) Refined definitions to enhance interpretative clarity, together with strengthened record-keeping and reporting obligations, including CEO-level declaration, and two-year record retention requirement.
- (b) Revised and strengthened standards on service availability, billing and non-billing related complaints handling and complaints resolution timeframes.
- (c) Provision of a clearer regulatory basis for oversight, public disclosure of performance, issuance of applicable guidelines, and enforcement action in cases of non-compliance with the Mandatory Standards.

## 1.2 Public Inquiry Exercise

- 1.2.1 Pursuant to subsections 55(2), 55(4), and 61 of the Communications and Multimedia Act 1998 (“CMA 1998”), the Malaysian Communications and Multimedia Commission (“Commission”) conducted a Public Inquiry (“PI”) and issued the PI Paper on 22 November 2025. The PI Paper outlined the proposed review and revisions to the standards relating to service availability, billing related complaints, non-billing complaints handling and customer complaints resolution time.
- 1.2.2 The PI invited feedback from the industry participants, members of the public, and other relevant stakeholders on the Commission’s proposed standards. In particular, the Commission sought comments on each proposed revision and general views on the continued relevance and adequacy of existing standards.
- 1.2.3 At the conclusion of the PI period, which ended at 12 noon on 31 January 2026, the Commission received five (5) submissions from the following industry respondents.

No.	Submitting Party	Submission Date
<b>Industry Respondents</b>		
1.	Star Media Radio Group	19 December 2025
2.	Media Prima Berhad (“MPB”)	19 December 2025
3.	Net2One Sdn. Bhd (“Net2One”)	19 January 2026
4.	TM Technology Services Sdn. Bhd (“TM Tech”)	30 January 2026
5.	Measat Broadcast Network System Sdn. Bhd (“Astro”)	30 January 2026

**Table 1:** Submission Received

- 1.2.4 The Commission notes that no responses were received from members of the public. The Commission has carefully reviewed all five (5) industry submissions, and a summary of the comments received together with the Commission’s suggestions received is outlined in this report.

1.2.5 The PI Report is presented within the thirty (30) days requirement from the conclusion of the PI, and the Commission may extend that period by not more than thirty (30) days, as stipulated under section 65 of the CMA 1998.

1.2.6 Pursuant to section 55(5) of the CMA 1998, within thirty (30) days from the publication of the PI Report, the Commission shall determine the matter by registering the new Commission Determination that reflects the Commission's final views is outlined in this PI Report.

### 1.3 Structure of the PI Report

1.3.1 The remainder of this PI Report is structured as follows:

- (a) Section 2 provides the input received in response to the proposed revisions and sets out the Commission's consideration and final views on each matter; and
- (b) Section 3 outlines the way forward and the intended implementation approach.

<b>No.</b>	<b>Question</b>	<b>Page No.</b>
Question 1	The Commission seeks views on the proposed revision to the Interpretation.	6
Question 2	The Commission seeks views on the proposed revision to the CASPs' general requirements.	14
Question 3	The Commission seeks views on the proposed inclusion of general obligations in the Mandatory Standards for Quality of Service (Content Applications Service) ("MSQoS CAS").	18
Question 4	The Commission seeks views on the proposed revision to the title and measurement period.	23

Question 5	The Commission seeks views on revising the existing standard on billing performance to measure the quality of billing related complaint handling service provided to customers.	28
Question 6	The Commission seeks views on the proposed revision to the standard on non-billing complaint handling.	33
Question 7	The Commission seeks views on the proposed relocation of billing related complaint resolution timeframes into a new provision, expanding the standard to cover non-billing complaints, and the revision of complaint resolution time.	37

**Table 2:** Summary of Questions

## 2. Public Inquiry Input and the Commission's View

### 2.1 Interpretation in the Mandatory Standards

**QUESTION 1:** The Commission seeks views on the proposed revision to the Interpretation.

Submitting Party	Comments
Net2One	<ul style="list-style-type: none"> <li>Net2One expresses reservation regarding the proposed definition of "closed" and submits that it requires further elaboration, particularly in relation to the phrase "<i>customer agrees to accept the resolution offered by the CASP</i>".</li> <li>Net2One recommends that the definition be aligned with the closure framework under the General Consumer Code of Practice for the Communications and Multimedia Industry Malaysia 2022 ("GCC 2022"), whereby a complaint may be closed under the following circumstances: <ul style="list-style-type: none"> <li>- With the explicit consent of the subscriber;</li> </ul> </li> </ul>

<b>Submitting Party</b>	<b>Comments</b>
	<ul style="list-style-type: none"> <li>- Where the subscriber is dissatisfied but has been informed of external dispute resolution options;</li> <li>- Where, after internal escalation, the complaint is determined to be frivolous or vexatious, and the subscriber is informed of external dispute resolution options; or</li> <li>- Where the subscriber is uncontactable, provided written notification of closure is issued.</li> </ul> <ul style="list-style-type: none"> <li>• In addition, Net2One proposes that the definition of “complaint” should expressly require service providers to receive and acknowledge customer requests for information, advice or clarification, to ensure timely management and regulatory compliance.</li> <li>• Net2One further submits that comprehensive industry engagement, including detailed explanations and simulations, should be conducted prior to implementation. Until such engagement is completed, Net2One recommends that the existing standards remain in force.</li> </ul>
Star Media Radio Group	<ul style="list-style-type: none"> <li>• Star Media Radio Group supports the proposed revisions to the interpretation section and states that the revised definitions provide greater clarity and better reflect the operational reality of broadcasting services.</li> </ul>
MPB	<ul style="list-style-type: none"> <li>• MPB recommends that the definition of “complaint” should exclude non-service matters, such as content opinions, programme dissatisfaction or issues relating to talent behaviour.</li> <li>• MPB submits that the current broad definition may inadvertently inflate complaint numbers for</li> </ul>

<b>Submitting Party</b>	<b>Comments</b>
	<p>broadcasters, particularly given the high public and social media engagement on non-service issues.</p>
Astro	<ul style="list-style-type: none"> <li>• Astro proposes refining the definition of “complaint” to clarify that complaints must be submitted through official complaint channels, such as call centres, social media platforms, or websites, and must relate to the service provider’s service and/or product requiring remedial action.</li> <li>• Astro further proposes that requests for information, advice or clarification should not be classified as complaints. However, if no or inadequate action is taken within a reasonable timeframe, any subsequent follow-up should then be classified as a complaint.</li> <li>• Astro recommends that the Commission provide greater specificity on what constitutes “inadequate action,” particularly clarifying that such classification should only arise after the service provider has issued an initial response.</li> </ul>
TM Tech	<ul style="list-style-type: none"> <li>• TM Tech is of the view that the proposed definition of “customer” is excessively broad and may not be appropriate as a regulatory standard applicable to all CASPs, whether free-to-air (“FTA”) or subscription-based.</li> <li>• TM Tech submits that by including potential and non-subscribing users, the definition captures a wide and undefined audience base that may not reflect actual service relationships whether contractual or non-contractual and may create disproportionate compliance obligations.</li> <li>• TM Tech recommends aligning the definition of “customer” with the definition adopted under the Commission Determination on Mandatory Standards for Quality of Service (Customer</li> </ul>

Submitting Party	Comments
	Service) 2021 ("MSQoS CS 2021"), currently enforced by the Commission for Wired Broadband Access Service, Wireless Broadband Access Service and Public Cellular Service. TM Tech considers that a more targeted definition, focused on active service recipients, would better reflect operational realities and maintain a fair and practicable regulatory framework.

**Table 3:** Responses to the proposed Interpretation used in Mandatory Standards

### Summary of Feedback

2.1.1 The Commission notes that Star Media Radio Group agreed with the proposed interpretations under the Mandatory Standards. Four (4) out of the five (5) respondents, namely Net2One, Astro, MPB and TM Tech, expressed concerns regarding certain proposed definitions and submitted suggested refinements. Net2One considered that the definitions of "complaint" and "closed" required further clarification. Astro requested clarification on the phrase "inadequate action" within the definition of "complaint". MPB raised concerns that the proposed definition of "complaint" was overly broad for broadcasters. TM Tech submitted that the definition of "customer" is too broad and may not be suitable as a regulatory standard for all CASP licensees.

2.1.2 Respondents who generally supported most of the proposed interpretations, including Star Media Radio Group and TM Tech, considered the revised definitions to be clear, better reflective of operational realities in broadcasting, and aligned with current industry practices. These respondents noted that the proposed definitions would assist in distinguishing audience enquiries from service-related complaints. They also expressed support for specific terms introduced or clarified by the Commission, including "content applications service provider" or "CASP", "guidelines", "reporting period", "subscriptions" and "working day". Overall, these respondents viewed the proposed interpretations as enhancing clarity and facilitating operational implementation.

- 2.1.3 Three (3) respondents — Net2One, Astro and MPB disagreed with aspects of the definitions of “closed”, “complaint” and “customer”, and proposed refinements. These respondents emphasised the importance of aligning the definition of “closed” with the closure conditions set out in the GCC 2022”, including subscriber consent, unresolved-but-informed cases, frivolous or vexatious complaints, and circumstances involving uncontactable subscribers. They also highlighted the need for clearer parameters for the phrase “inadequate action” within the definition of “complaint”, clearer differentiation between enquiries and genuine complaints, and the exclusion of editorial or content-related matters from service-quality definitions.
- 2.1.4 TM Tech proposed that the definition of “customer” be aligned with the MSQoS CS 2021 and limited to active subscribers. MPB similarly requested that content-related matters be excluded from the scope of “complaint” under the MSQoS CAS framework.
- 2.1.5 Astro further recommended clarifying the thresholds for the phrase “inadequate action” within the definition of “complaint”, including specifying that inadequacy should only arise after the service provider has issued an initial response. Astro also proposed that service providers be expressly required to acknowledge enquiries and that the Determination clearly stipulates when an enquiry escalates into a complaint.

## **Commission’s View**

### **Phrase of “inadequate action”**

- 2.1.6 The Commission has carefully considered the feedback requesting further elaboration of the phrase “inadequate action”. However, the Commission is of the view that the current drafting provides sufficient clarity and remains consistent with the intent, structure and obligations under the GCC 2022.
- 2.1.7 Paragraph 2.2 of the GCC 2022 establishes baseline behavioural standards for service providers, including the obligation to take “reasonable steps”, provide adequate information, treat consumers fairly, and implement effective enquiry and complaint management

processes. The assessment of whether action is “adequate” must therefore be read within this established regulatory framework.

- 2.1.8 Inadequate handling of an enquiry, when assessed against these principles, may properly elevate the matter to complaint status. The Commission is of the view that introducing prescriptive thresholds or rigid criteria for “inadequate action” would unnecessarily constrain regulatory oversight and reduce flexibility in assessing adequacy on a case-by-case basis.
- 2.1.9 The interpretation of “inadequate action” must be read together with Section 188 of the CMA 1998, which requires licensees to deal reasonably with consumers and to address consumer complaints in an effective and responsible manner. The combined effect of the CMA 1998 and GCC 2022 provides a clear legal and operational benchmark against which adequacy is to be assessed.
- 2.1.10 Accordingly, the Commission determines that the existing phrasing is appropriate and will be retained without amendment.

### **Definition of Closed**

- 2.1.11 The Commission notes Net2One’s submission that the proposed definition of “closed” should replicate the specific closure scenarios outlined under the GCC 2022.
- 2.1.12 The Commission considers that the proposed definition provides sufficient operational clarity and is aligned with the intent of Paragraph 2.2 of the GCC 2022, which emphasises adequate handling and the taking of reasonable steps in resolving consumer issues.
- 2.1.13 While the GCC 2022 provides illustrative closure circumstances, the MSQoS CAS framework is performance-based and outcome-oriented. It is not intended to replicate procedural detail from the GCC 2022 but to measure whether complaints are resolved effectively within prescribed timelines.

2.1.14 The proposed definition is also harmonised with the MSQoS CS 2021 framework, thereby ensuring regulatory consistency across quality-of-service determinations.

2.1.15 The Commission is therefore satisfied that the definition of “closed” strikes an appropriate balance between clarity and regulatory flexibility and will retain the definition without modification.

### **Definition of Complaint**

2.1.16 The Commission has considered the suggestion that the definition should expressly require service providers to acknowledge enquiries before such matters may escalate into complaints.

2.1.17 The Commission is of the view that the existing drafting already provides sufficient clarity and appropriately distinguishes between enquiries and complaints. The definition is aligned with Paragraph 2.2 of the GCC 2022 and consistent with the definition adopted under MSQoS CS 2021.

2.1.18 All complaints received by a CASP shall be subject to the Mandatory Standards for the purposes of complaint handling obligations. For the purpose of performance measurement under the MSQoS, the evaluation shall be confined to the effectiveness, adequacy and timeliness of the CASP’s complaint handling and resolution processes, particularly in circumstances where remedial action is required in respect of services provided under the CASP’s licence.

2.1.19 For regulatory certainty and measurement of integrity, complaints must be lodged through recognised or official complaint channels. The Commission will introduce minor clarification to reflect this requirement.

2.1.20 Subject to this clarification, the definition of “complaint” will be retained.

## Definition of Customer

2.1.21 The Commission notes TM Tech's concern that the proposed definition of "customer" may be overly broad and could impose disproportionate compliance obligations on subscription-based CASPs.

2.1.22 The Commission acknowledges that quality-of-service measurement must be proportionate and anchored to the relevant active service base. However, content applications service operate under varying models, including subscription-based services and audience-based services such as FTA television and radio.

2.1.23 Limiting the definition exclusively to contractual subscribers would fail to capture the operational realities of FTA services, where viewership and listenership constitute the relevant service base.

2.1.24 To ensure proportionality while preserving inclusivity, the Commission refines the definition as follows:

*"customer" means a person or persons who acquires, subscribes to, receives, accesses, views, or listens to a content applications service.*

2.1.25 The inclusion of "views" and "listens" ensures that audience-based services are appropriately captured for the purposes of non-billing complaint measurement, where "customer" serves as the denominator. At the same time, performance measurement will apply to the appropriate denominator according to service category, namely, active subscriptions for subscription CASPs and relevant audience base for FTA services.

2.1.26 This refined definition ensures that the regulatory framework remains proportionate, reflective of actual service relationships, and consistent with Section 188 of the CMA 1998, while maintaining harmonisation with MSQoS CS 2021 principles.

2.1.27 The Commission is satisfied that:

- (a) The proposed definitions provide sufficient legal certainty;
- (b) Alignment with the GCC 2022 and Section 188 CMA 1998 is preserved;

- (c) Regulatory flexibility is maintained without compromising accountability;
- (d) The framework remains proportionate across differing service models; and
- (e) The revised definitions strengthen consumer protection while remaining operationally practicable.

Accordingly, the Commission will proceed with the proposed definitions, subject only to the minor refinements stated above.

## 2.2 General Requirements for Record Keeping and Report Submission

**QUESTION 2:** The Commission seeks views on the proposed revision to the CASPs' general requirements for record keeping and report submission.

<b>Submitting Party</b>	<b>Comments</b>
Net2One	<ul style="list-style-type: none"> <li>• Net2One submits that the proposed obligation to maintain quality of service records should be preceded by comprehensive industry engagement, including detailed explanations and practical simulations, to ensure clear understanding and smooth integration into internal operational processes. Pending such engagement, Net2One recommends that the existing standards remain in force.</li> <li>• Net2One further recommends retaining the current report submission timeline, on the basis that the proposed shorter timeframe may pose operational challenges, particularly for service providers with large customer bases.</li> <li>• In addition, Net2One proposes that the required declaration accompanying the report should continue to be signed by an appointed officer duly authorised by the board of directors, rather than mandating CEO-level declaration.</li> </ul>

<b>Submitting Party</b>	<b>Comments</b>
Star Media Radio Group	<p>Star Media supports the proposed revisions to the record-keeping and reporting obligations. In particular:</p> <ul style="list-style-type: none"> <li>• It considers the two-year record retention requirement to be reasonable and operationally practicable.</li> <li>• It views the 30-day reporting timeline as workable and aligned with compliance processes.</li> <li>• It agrees that CEO-level declaration enhance accountability, strengthen governance oversight, and improve the accuracy and integrity of reporting.</li> </ul>
MPB	<ul style="list-style-type: none"> <li>• MPB recommends retaining the existing six-week (42-day) report submission timeline.</li> <li>• Submits that the proposed 30-day requirement may be challenging to meet due to complex data consolidation across multiple platforms and third-party systems.</li> </ul>
Astro	<ul style="list-style-type: none"> <li>• Astro acknowledges that the proposed two-year record retention requirement is consistent with its existing internal practices.</li> <li>• Recommends maintaining the existing 42-day submission timeline, stating that it provides sufficient buffer for comprehensive data validation, internal approvals, reconciliation processes, quality checks, particularly during complex reporting periods.</li> </ul>
TM Tech	<ul style="list-style-type: none"> <li>• Supports the Commission’s proposed revisions to the General Requirements, including: <ul style="list-style-type: none"> <li>- The two-year record retention requirement;</li> <li>- The 30-day reporting timeline; and</li> <li>- The CEO-level declaration requirement.</li> </ul> </li> </ul>

<b>Submitting Party</b>	<b>Comments</b>
	<ul style="list-style-type: none"> <li>• However, recommends that the Commission introduce a clearly defined transition period prior to enforcement to allow licensees adequate time to:                             <ul style="list-style-type: none"> <li>- Configure or enhance reporting systems;</li> <li>- Conduct necessary data validation; and</li> <li>- Align internal governance processes to ensure effective implementation during the initial reporting cycles.</li> </ul> </li> </ul>

**Table 4:** Responses on Licensees and persons subject to the Mandatory Standards

### Summary of Feedback

2.2.1 The Commission notes that two (2) out of five (5) respondents, namely Star Media Radio Group and TM Tech, supported the proposed general requirements for record keeping and report submission. Both respondents agreed that the two-year record retention requirement is reasonable and aligned with existing practices. TM Tech also supported the 30-day reporting timeline and CEO-level declaration requirement but requested that the Commission provides sufficient lead time and structured implementation guidance to ensure seamless adoption across diverse CASP operational environments.

2.2.2 MPB did not raise concerns regarding the proposed record retention requirement. However, MPB proposed that the existing six-week (42-day) report submission timeline be maintained, noting that a 30-day submission timeframe may pose operational challenges, particularly due to complex data consolidation across multiple platforms and third-party systems.

2.2.3 Similarly, Astro acknowledged that the two-year record retention requirement is consistent with its internal practices but preferred retaining the 42-day reporting timeline. Astro submitted that the longer timeframe allows for comprehensive data validation, reconciliation processes, internal approvals, and quality checks, particularly during complex reporting cycles. Astro also highlighted

the need for clearer reporting templates and implementation guidance.

- 2.2.4 Net2One expressed concerns regarding the proposed general requirements and requested that the current reporting practices be retained or that a transition period be introduced to allow CASPs to adapt internal systems and processes to the revised expectations. Net2One further requested comprehensive industry engagement prior to implementation and disagreed with the proposed CEO-level declaration requirement, citing operational challenges and additional administrative burden.
- 2.2.5 Overall, while there is general support for strengthening governance and reporting accuracy, several respondents emphasised the need for practical implementation measures, particularly in relation to the reporting timeline, transition arrangements, and operational guidance.

### **Commission's View**

- 2.2.6 The Commission is of the view that the proposed general requirements, including the two-year record retention period, the 30-day report submission timeline, and the requirement for CEO-level declaration are consistent with the MSQoS CS 2021, and are necessary to ensure accuracy, integrity, and verifiability of information submitted for regulatory oversight.
- 2.2.7 The Commission acknowledges the operational concerns raised regarding data consolidation, internal validation, and approval processes. However, the Commission considers that a 30-day reporting timeline is reasonable, proportionate, and aligned with contemporary regulatory standards. Timely submission of accurate performance data is essential to enable effective monitoring, enhance transparency, and facilitate prompt regulatory intervention where necessary.
- 2.2.8 With respect to the CEO-level declaration requirement, the Commission considers this measure necessary to strengthen governance accountability and reinforce the integrity of reporting obligations. The requirement does not introduce a new compliance principle but elevates existing internal verification processes to

ensure that performance data submitted to the Commission reflects board-level oversight.

2.2.9 The Commission notes the request for comprehensive pre-implementation engagement, including simulations and detailed briefings. However, the revised MSQoS CAS has already undergone a full Public Inquiry process pursuant to sections 55 and 61 of the CMA Act 1998, which constitutes a form of statutory consultation. While the Commission remains committed to ongoing engagement to support implementation, additional pre-determination consultation is not required and must be balanced against the need for timely regulatory updates in the public interest.

2.2.10 To facilitate compliance and ensure orderly implementation, the Commission will provide the required reporting templates and will determine an appropriate transition period prior to full enforcement of the proposed obligations.

2.2.11 Accordingly, the Commission’s final determination is to retain the proposed two-year record retention requirement, 30-day report submission timeline, and CEO-level declaration requirement, subject to the issuance of supporting guidance and an appropriate transition period to ensure consistent and effective implementation.

## 2.3 General Obligations

**QUESTION 3:** The Commission seeks views on the proposed inclusion of general obligations in the MSQoS CAS.

<b>Submitting Party</b>	<b>Comments</b>
Net2One	<ul style="list-style-type: none"> <li>Net2One expressed concern that public disclosure of CASP performance and compliance reports may create unnecessary negative sentiment or misinterpretation, as service providers operate under differing business models and service conditions. Net2One recommended maintaining the current practice and cautioned against</li> </ul>

<b>Submitting Party</b>	<b>Comments</b>
	<p>potential adverse business impact resulting from public misperception.</p> <ul style="list-style-type: none"> <li>• Net2One recommended greater industry engagement before introducing new guidelines or implementing the proposed general obligations. They suggested that detailed explanations and simulations be conducted to ensure stakeholders clearly understand regulatory expectations and can integrate them effectively into internal processes.</li> </ul>
Star Media Radio Group	<ul style="list-style-type: none"> <li>• Star Media Radio Group supported the inclusion of additional general obligations, viewing them as enhancing transparency and clarifying compliance expectations. Star Media further suggested that broadcasters be encouraged to provide clearer customer communication channels, FAQs, and self-help resources to reduce avoidable complaints and improve audience understanding.</li> </ul>
MPB	<ul style="list-style-type: none"> <li>• MPB requested that any public comparison of service performance be presented fairly and in an easily understandable manner. MPB highlighted that broadcasters operate under distinct technical and environmental constraints (e.g., transmission towers, satellite feeds, weather conditions), and that performance comparisons without appropriate context may be misleading.</li> <li>• MPB submitted that unintentional technical faults arising from external dependencies, such as transmission infrastructure, utility disruptions, shared facilities, or adverse weather, should not automatically constitute contraventions unless negligence is established.</li> <li>• MPB emphasised that free-to-air broadcasters should not be penalised for risks outside their direct control.</li> </ul>

Submitting Party	Comments
Astro	<ul style="list-style-type: none"> <li>• Astro takes note of the proposed inclusion of general obligations within the MSQoS CAS framework. In this regard, Astro strongly recommends more industry engagement to ensure clarity and alignment of regulatory expectations.</li> </ul>
TM Tech	<ul style="list-style-type: none"> <li>• TM Tech supports the proposed inclusion of new general obligations under the MSQoS CAS.</li> <li>• TM Tech supported publication in principle but recommended that the Commission provide advance notice to licensees prior to publishing performance results or issuing new or revised guidelines. This would allow licensees reasonable time to review information, seek clarification, and prepare for any implications arising from publication.</li> </ul>

**Table 5:** Responses on Licensees and persons subject to the Mandatory Standards

### Summary of Feedback

2.3.1 The Commission notes that two (2) out of the five (5) respondents expressed support for the proposed inclusion of general obligations in the MSQoS CAS. Star Media Radio Group supports the proposal, viewing it as enhancing transparency and clarifying compliance expectations. TM Tech similarly supports the proposal but requests that CASPs be provided with advance notice prior to the publication of performance results to allow adequate time for review and preparation.

2.3.2 Three (3) respondents, namely Net2One, MPB, and Astro raised concerns about the potential implications of publishing MSQoS performance results without appropriate contextualisation. These respondents submitted that service providers operate under differing technical, operational and environmental conditions, and

that public disclosure without sufficient explanation may result in misinterpretation or unfair comparison.

2.3.3 Net2One and Astro further emphasised the need for comprehensive industry engagement prior to the issuance of new guidelines or the implementation of additional general obligations, to ensure clarity of regulatory expectations and operational feasibility.

2.3.4 In addition, MPB and Net2One submitted that unintentional technical faults arising from external factors, such as transmission tower failures, utility disruptions, adverse weather conditions, or third-party infrastructure dependencies, should not automatically constitute contraventions unless negligence is established. TM Tech supported this position and called for clear exemption provisions for incidents beyond a licensee's reasonable control.

2.3.5 Overall, the key themes arising from respondents' submissions include:

- (a) The need for contextualisation and fairness in the publication of performance results;
- (b) Requests for structured engagement and advance notice prior to implementation; and
- (c) The importance of clear exemption mechanisms for events outside a licensee's reasonable control.

### **Commission's View**

2.3.6 The Commission is of the view that the proposed inclusion of general obligations is necessary to strengthen transparency, promote consistent interpretation of the Mandatory Standards, and facilitate effective enforcement of the MSQoS CAS framework.

2.3.7 These obligations are aligned with the MSQoS CS 2021, where the Commission retains the authority to publish performance results, issue guidelines, and prescribed enforceable requirements. The proposed provisions therefore represent a continuation and harmonisation of the Commission's established quality of service regulatory framework.

- 2.3.8 With respect to concerns regarding potential misinterpretation of published MSQoS performance results, the Commission acknowledges that service providers operate under differing technical, environmental and operational conditions. In order to ensure fairness and contextual clarity, the Commission will undertake appropriate pre-publication engagement with affected CASPs. This will allow clarification of data, contextual explanation where necessary, and orderly communication prior to public disclosure.
- 2.3.9 On the issue of contravention, the Commission emphasises that enforcement action is assessed in accordance with established legal principles, including consideration of whether non-compliance arises from circumstances within a licensee's reasonable control. Events attributable to external dependencies, force majeure, or infrastructure beyond a licensee's control will be evaluated accordingly. The framework is not intended to penalise licensees for circumstances where negligence or failure to take reasonable steps is not established.
- 2.3.10 The Commission also notes requests for structured engagement prior to the issuance of guidelines. The proposed MSQoS CAS has undergone a full Public Inquiry process pursuant to sections 55 and 61 of the Communications and Multimedia Act 1998, which constitutes the highest form of statutory consultation. Nonetheless, the Commission remains committed to ongoing dialogue with industry to facilitate implementation and ensure operational clarity.
- 2.3.11 To facilitate compliance and ensure orderly implementation, the Commission will issue the necessary reporting templates and implementation guidance and will determine an appropriate transition period prior to full enforcement of the revised requirements.
- 2.3.12 Accordingly, the Commission determines that the proposed general obligations are appropriate, proportionate, and necessary to safeguard transparency, regulatory clarity, and enforceability under the Mandatory Standards, and will proceed to retain them.

## 2.4 Standard on Service Availability

**QUESTION 4:** The Commission seeks views on the proposed revision to the title and measurement period.

<b>Submitting Party</b>	<b>Comments</b>
Net2One	<ul style="list-style-type: none"> <li>• Net2One explained that it operates as a content aggregator hosting FTA channel, on MYTV Broadcasting Sdn Bhd ("MYTV") platform. Under this model, service availability depends on MYTV's Digital Terrestrial Television ("DTT") platform and content provider delivery channels.</li> <li>• MYTV's DTT service is not subject to the MSQoS CAS and does not provide subscription-based services to the public. At present, MYTV adopts a co-regulation policy for its DTT service, which covers service availability and service restoration.</li> <li>• Given that Net2One's service has not yet been rolled out, Net2One is unable to provide a substantive view on the proposed formula for the requirement.</li> </ul>
Star Media Radio Group	<ul style="list-style-type: none"> <li>• We support the shift from an annual to a half-yearly measurement and reporting cycle.</li> <li>• Shorter cycles enable earlier detection of service transmission issues and facilitate more timely corrective action.</li> <li>• This enhances operational monitoring without imposing undue reporting burden.</li> <li>• It is appropriate given the importance of uninterrupted broadcasting. This approach also helps reduce transmission failures.</li> </ul>

<b>Submitting Party</b>	<b>Comments</b>
MPB	<ul style="list-style-type: none"> <li>• MPB recommends retaining 99% availability threshold on a 12-month basis, using six-month data for monitoring purposes only.</li> <li>• A shorter window may introduce statistical volatility.</li> <li>• Seasonal or temporary disruptions (e.g., monsoon-related outages) could disproportionately affect compliance outcomes.</li> <li>• If half-year measurement is adopted, MPB suggests recalibrating the threshold or introducing grace margins/exclusions for verified external downtime.</li> </ul>
Astro	<ul style="list-style-type: none"> <li>• Astro acknowledges the proposed renaming of "Annual Service Availability" to "Service Availability" and the shift from an annual to a half-yearly reporting period, but submits that:               <ul style="list-style-type: none"> <li>(a) No revision to the reporting cycle is necessary at this stage.</li> <li>(b) Current service availability management aligns with the best internal practices and recognised broadcast industry standards.</li> <li>(c) The existing annual measurement cycle has been stable and effective.</li> </ul> </li> </ul>
TM Tech	<ul style="list-style-type: none"> <li>• TM Tech supports the proposed revision to the title and measurement period of the Service Availability standard.</li> <li>• TM Tech emphasised the need for clear exemption provisions for service disruptions beyond a licensee's reasonable control.               <ul style="list-style-type: none"> <li>(a) In the absence of explicit exemptions, the Commission should consider such events during compliance assessment and enforcement decisions.</li> </ul> </li> </ul>

<b>Submitting Party</b>	<b>Comments</b>
	<p>(b) Licensees exercising reasonable care and due diligence should not be penalised for uncontrollable events.</p> <ul style="list-style-type: none"> <li>• TM Tech proposed that incidents beyond reasonable control include, but are not limited to the following:           <ul style="list-style-type: none"> <li>(a) External or Third-Party Incidents               <ul style="list-style-type: none"> <li>- Infrastructure damage caused by third parties (e.g., cable cuts, vandalism, and construction works);</li> <li>- Outages of third-party platforms (e.g., cloud services, content delivery infrastructure);</li> <li>- Industry-wide transitions (e.g., satellite frequency changes, solar outages); and</li> <li>- Prolonged power supply failures.</li> </ul> </li> <li>(b) Major Operational Incidents               <ul style="list-style-type: none"> <li>- Severe unplanned disruptions despite reasonable care;</li> <li>- Network facility failures (maintenance, upgrade works, fibre cuts due to malicious acts or disasters);</li> <li>- Broadcast equipment malfunctions; and</li> <li>- Cybersecurity incidents or malware-related disruptions.</li> </ul> </li> <li>(c) Force Majeure Events               <ul style="list-style-type: none"> <li>- Natural disasters (floods, earthquakes, storms, fire);</li> <li>- Pandemics or public health emergencies;</li> <li>- War, terrorism, civil unrest; and</li> <li>- Other unforeseeable and unavoidable events beyond reasonable control.</li> </ul> </li> </ul> </li> </ul>

**Table 6:** Responses on Licensees and persons subject to the Mandatory Standards

## Summary of Feedback

- 2.4.1 The Commission notes that two (2) out of five (5) respondents, namely Star Media Radio Group and TM Tech, support the revised title and the proposal to measure service availability over a six-month period rather than on an annual basis. These respondents are of the view that a shorter reporting cycle more accurately reflects current service performance and enables improvement made by the CASPs to be captured in a more timely manner.
- 2.4.2 TM Tech, while supporting the proposed revision, requested the inclusion of clear exemption provisions for service disruptions arising from third-party incidents or force majeure events beyond the control of CASP. TM Tech emphasised that CASPs should not be held accountable for service interruptions arising from circumstances beyond their reasonable control and that explicit exemption mechanisms are necessary to safeguard against disproportionate or unfair regulatory liability.
- 2.4.3 Astro and MPB, expressed a preference to retain the existing annual measurement cycle, citing concerns that a six-month reporting window may introduce performance volatility. Astro highlighted that its existing internal best practices, applied consistently across its product and service platforms, have effectively met operational and business requirements under the current annual measurement cycle. MPB similarly supported maintaining annual cycle and further suggested that, if the six-month measurement period is adopted, the Commission should consider recalibrating the availability threshold (e.g., 99% standard) or introducing an exclusion or grace mechanism for downtime beyond the CASPs' control.
- 2.4.4 Net2One indicated that it was unable to provide a definitive position on the proposed revision, as its service has not yet been fully rolled out and its reporting obligations are dependent on MYTV's platform operations.

## Commission's View

- 2.4.5 The Commission recognises the operational challenges highlighted by CASPs, including dependencies on third-party facilities,

environmental constraints and the need for internal system adjustments to support revised measurement requirements.

- 2.4.6 Based on benchmarking and regulatory assessment, the Commission notes that a half-yearly measurement window is comparatively less stringent than a quarterly assessment period, such as that applied under the MYTV Broadcasting Reference Access Offer (1 April 2024), or the 'worst-month' performance basis referenced in ITU benchmarks for digital broadcasting performance. The proposed six-month assessment therefore represents a balanced and proportionate approach.
- 2.4.7 The Commission is of the view that the proposed revision is necessary to enhance accuracy, timeliness and reliability of service availability monitoring. A shorter reporting cycle allows performance to be assessed more frequently, better captures actual service conditions, and facilitates earlier identification of recurring or systemic issues. This, in turn, enables more timely regulatory oversight and intervention where necessary.
- 2.4.8 In regard to concerns regarding the exemption provisions, the Commission recognises that established MSQoS practice already accounts for circumstances beyond a licensee's reasonable control. Events attributable to force majeure, external infrastructure failures, or third-party incidents will be considered during compliance assessment and enforcement determination, provided that such events are duly evidenced.
- 2.4.9 At the same time, CASPs are expected to maintain prudent contractual arrangements, implement appropriate redundancy measures, and establish effective escalation procedures in managing third-party dependencies. Downtime attributable to contracted providers remain the responsibility of the CASP unless the incident falls within recognised exclusion categories and is supported by sufficient evidence. This approach ensures that licensees are not subject to disproportionate liability while preserving accountability for operational risk management.
- 2.4.10 Accordingly, the Commission is of the view that the proposed revision to the Service Availability standard, including the shift to a

six-month measurement period, is appropriate, proportionate and aligned with established regulatory practice, and will be retained.

## 2.5 Standards on Billing Related Complaints

**QUESTION 5:** The Commission seeks views on the proposed revision to the existing standard on billing performance. To measure the quality of billing related complaint handling service provided to customers.

<b>Submitting Party</b>	<b>Comments</b>
TNet2One	<ul style="list-style-type: none"> <li>• Net2One did not provide substantive comments on the proposed revision, as it has not yet commence service rollout under its CASP licence.</li> <li>• Net2One clarified that its DTT service will be FTA and not subscription based.</li> <li>• Revenue will be generated through access fees, advertising, and other monetisation arrangements rather than subscriber billing.</li> </ul>
Star Media Radio Group	<ul style="list-style-type: none"> <li>• Star Media Radio Group agrees that billing performance should be measured against the number of subscriptions, as this more accurately reflects customer experience for subscription-based or bundled services. However, Star Media clarified that the billing-related metric is not applicable to FTA service providers.</li> </ul>
MPB	<ul style="list-style-type: none"> <li>• Threshold: Propose retaining the 2% threshold for flexibility.</li> <li>• Although current complaint levels are below the proposed 1% threshold, MPB submits that retaining 2% provides operational flexibility, particularly during subscriber growth, transitional reporting adjustments, or temporary billing dispute spikes.</li> </ul>

<b>Submitting Party</b>	<b>Comments</b>
	<ul style="list-style-type: none"> <li>• MPB maintains that the 2% threshold remains sufficient to ensure effective complaint handling and customer satisfaction.</li> </ul>
Astro	<ul style="list-style-type: none"> <li>• Astro does not support the proposed reduction to a 1% threshold or the shift to subscription-based measurement in its current form.</li> <li>• Astro highlighted that its multi-service billing ecosystem consolidates various third-party applications and content providers under a single billing environment.</li> <li>• Campaigns, promotional activities, policy changes, price adjustments, or upstream partner updates may temporarily increase complaint volumes, even where Astro’s billing processes function correctly.</li> <li>• Astro submits that the expanded scope of billing-related complaints may introduce variability not directly attributable to billing accuracy.</li> <li>• Given the bundled and partner-driven environment, Astro considers the existing 2% threshold to be a more proportionate and representative benchmark.</li> </ul>
TM Tech	<ul style="list-style-type: none"> <li>• TM Tech supports the proposed revision, including:               <ul style="list-style-type: none"> <li>- Renaming the standard to “Billing Related Complaints”;</li> <li>- Measuring complaints on a per-subscription, half-yearly basis; and</li> <li>- Relocating billing complaint resolution requirements under the “Standard on Customer Complaints Resolution Time” section for clearer structure.</li> </ul> </li> <li>• TM Tech considers the subscription-based measurement to better reflect customer experience and align with digital billing practices.</li> </ul>

<b>Submitting Party</b>	<b>Comments</b>
	<ul style="list-style-type: none"> <li>• TM Tech further recommends that the revised standard explicitly limit a licensee’s accountability to CAS subscriptions only.                             <ul style="list-style-type: none"> <li>- In certain commercial arrangements, CASPs may facilitate billing or payment collection for third-party Over-the-Top (OTT) service providers.</li> <li>- Such arrangements do not constitute CAS subscriptions, as the contractual relationship exists between the customer and the OTT provider.</li> <li>- TM Tech submits that CASPs should only be accountable for billing accuracy and complaint handling within the regulatory scope of the MSQoS CAS.</li> </ul> </li>   <li>• TM Tech emphasises that clear delineation is necessary to:                             <ul style="list-style-type: none"> <li>- Avoid unintended extension of regulatory obligations beyond content applications services; and</li> <li>- Ensure that the billing complaint indicator remains fair, proportionate, and aligned with actual service responsibility.</li> </ul> </li> </ul>

**Table 7:** Responses on Licensees and persons subject to the Mandatory Standards

### Summary of Feedback

2.5.1 The Commission notes that two (2) out of five (5) respondents, namely Star Media Radio Group and TM Tech, support the proposed move towards a subscription-based measurement approach, whereby billing-related complaints are measured on a per-subscription basis rather than by the number of bills issued. These respondents consider the revised methodology to better reflect customer experience and align with modern digital billing practices. They also support refining the title to “Standards on Billing Related Complaints” and relocating billing complaint resolution standards

to a dedicated “Standard on Customer Complaints Resolution Time” section for clearer structure and regulatory coherence.

2.5.2 Star Media Radio Group emphasised that subscription-based metrics are not applicable to FTA CASPs. Similarly, Net2One did not provide substantive input, noting that its CASP services have yet to be launched and its approved business model operates as a content aggregator hosting FTA channel on the DTT platform, without subscription-based offering.

2.5.3 TM Tech further recommended that the revised standard expressly limit CASP accountability for billing-related complaints to subscription-based content applications service within the scope of the CASP licence, to avoid unintended expansion of regulatory obligations beyond licensed services.

2.5.4 MPB proposed retaining the existing 2% threshold, submitting that the 2% benchmark would provide operational flexibility, accommodate subscriber growth, absorb temporary spikes in complaints and ease the transition to half-yearly reporting.

2.5.5 Astro did not support the proposed revision, citing that the shift to a subscription-based denominator and the reduction to a 1% threshold do not adequately reflect its multi-service operating environment. Astro highlighted that bundled and partner-driven services may generate complaint fluctuations beyond its direct operational control. Astro therefore considers the existing 2% threshold to be a more proportionate benchmark and recommends maintaining the current standard.

2.5.6 Overall key highlights raised by respondent include:

- (a) Support for subscription-based measurement where applicable;
- (b) Concerns regarding threshold reduction from 2% to 1%;
- (c) Clarification of scope to ensure accountability is limited to licensed CAS services; and
- (d) Recognition that FTA service models are not subject to subscription-based billing metrics.

## Commission's View

- 2.5.7 The Commission acknowledges the concerns raised regarding potential expansion of scope and the impact of partner-driven factors in billing-related complaint volumes. The Commission also notes TM Tech's recommendation that accountability should be clearly limited to subscription-based services within the scope of the CASP licence.
- 2.5.8 The Commission affirms that the billing-related complaints standard applies solely to subscription-based content applications service lawfully provided under the CASP licence. It does not extend regulatory obligations to third-party providers, accountability under the MSQoS CAS remains confined to billing accuracy and complaint handling within the licenced service scope. outside the CASP's licensed remit.
- 2.5.9 The refinement to adopt a per-subscription denominator is intended to improve the measurement precision and better reflect actual customer exposure to billing activity. It does not expand the regulatory scope of the existing standard. The categories of billing-related complaints remain unchanged with the current MSQoS CAS framework.
- 2.5.10 The proposed methodology and threshold are also aligned with the approach adopted under the MSQoS CS 2021, thereby ensuring regulatory harmonisation across quality-of-service determinations.
- 2.5.11 In light of the above, the Commission determines that the proposed revision to the billing-related complaints standard, including the subscription-based measurement approach and the 1% half-yearly threshold, is appropriate, proportionate, and reflective of contemporary service delivery models.
- 2.5.12 To ensure orderly transition, the Commission will implement the revised standard on a phased basis, supported by implementation guidance where necessary.
- 2.5.13 Accordingly, the Commission will retain the proposed revision to the existing standard on billing performance.

## 2.6 Standard on Non-Billing Related Complaints

**QUESTION 6:** The Commission seeks views on the proposed revision to the standard on non-billing complaint handling.

<b>Submitting Party</b>	<b>Comments</b>
Net2One	<ul style="list-style-type: none"> <li>• Net2One opines that the proposed standard of a maximum of 10 non-billing complaints per 1,000 customers over a six-month period is too strict to achieve and recommends maintaining the current standard.</li> <li>• Net2One also requests comprehensive industry engagement, including detailed explanations, and simulations, prior to implementation. Until such engagement is completed, Net2One recommends that the current standard remain in force.</li> </ul>
Star Media Radio Group	<ul style="list-style-type: none"> <li>• Star Media Radio Group supports the proposed revision, including a clearer and stricter threshold.</li> <li>• The revised definition appropriately captures broadcaster related complaints such as service quality issues, technical disruptions, content delivery problems, and customer service conduct.</li> <li>• The stricter benchmark is viewed as encouraging stronger internal monitoring, faster technical response, and improved audience engagement.</li> </ul>
MPB	<ul style="list-style-type: none"> <li>• MPB recommends maintaining the existing approach, focusing only on technical or service-related issues. Complaints relating to content, programmes, or editorial matters should be excluded.</li> <li>• MPB submits that the proposed limit of 10 complaints per 1,000 subscribers per six months is significantly stricter than the previous 50 per 1,000 annually and may not be proportionate.</li> </ul>

<b>Submitting Party</b>	<b>Comments</b>
Astro	<ul style="list-style-type: none"> <li>• Astro does not support the proposed revision and recommends retaining the existing threshold.</li> <li>• Astro highlights that its expanded multi-device, multi-platform ecosystem results in a broader range of non-billing complaints influenced by customer behaviour, device compatibility, content issues, and external circumstances.</li> <li>• The clarified definition, which includes service quality, restoration timelines, picture or sound issues, customer service interactions, and technical performance concerns, may lead to fluctuating complaint volumes not necessarily indicative of systemic service failures.</li> <li>• Astro submits that the existing 5% threshold remains more realistic and proportionate given today's diversified viewing environment.</li> </ul>
TM Tech	<ul style="list-style-type: none"> <li>• TM Tech supports the proposed threshold of 10 non-billing complaints per 1,000 per half-year. However, TM Tech recommends that the denominator be "subscriptions" rather than "customer".</li> <li>• As a subscription-based CASP, TM Tech submits that complaint measurement should apply only to subscribed content applications service. Complaints from non-subscribers, including those accessing services through free viewing or promotional arrangements, should not be included in MSQoS CAS performance measurement.</li> </ul>

**Table 8:** Responses on Licensees and persons subject to the Mandatory Standards

## Summary of Feedback

- 2.6.1 The Commission notes that three (3) out of five (5) respondents, namely Net2One, Astro and MPB, consider the proposed threshold of 10 non-billing complaints per 1,000 customers per six-month reporting to be too stringent and have requested that the existing standard be maintained.
- 2.6.2 Net2One emphasises the need for comprehensive industry engagement, including detailed explanations and practical simulations, to ensure that CASPs clearly understand the operational implications of the revised metric and are able to effectively integrate the requirements into their internal processes.
- 2.6.3 Astro and MPB expressed concerns that the revised threshold may not adequately reflect the complexity of modern multi-platform service environments. They submitted that the broadened scope of non-billing complaints, which includes service quality issues, technical performance matters, and customer service interactions, may result in fluctuating complaint volumes that are not necessarily indicative of systemic service deficiencies.
- 2.6.4 In contrast, Star Media Radio Group and TM Tech support the proposed revision to strengthen and clarify the non-billing complaints standard. TM Tech reiterates that the denominator should be based on subscriptions, rather than “customers”, to accurately reflect actual service relationships in subscription-based CASP models.

## Commission’s View

- 2.6.5 The Commission notes that a majority of the respondents requested the retention of the existing non-billing complaints standard and takes note of Net2One’s suggestion to conduct simulation prior to full implementation.
- 2.6.6 For clarity, the Commission emphasises that the proposed revision does not introduce any fundamentally new complaint categories. Matters relating to customer experience or service interaction, including sound or picture quality issues, unprofessional conduct by staff or contractors, restoration timelines and other customer

service-related complaints, are already captured under Paragraph 6 of the existing MSQoS CAS. The revised drafting serves to clarify and consolidate these categories rather than expand the regulatory scope.

2.6.7 CASPs remain responsible for managing non-billing complaints arising from services within their licensed remit, consistent with the established regulatory principles and service accountability obligations.

2.6.8 With respect to the denominator, the Commission notes TM Tech's recommendation and confirms that quality-of-service measurement will be aligned to the relevant service category. Subscription-based services will be measured using the number of active subscriptions, while FTA television and radio services will be measured using audience reach. This ensures proportionality and reflects the operational realities of different service models.

2.6.9 In support of continuous service-quality improvement, the Commission considers it appropriate to strengthen the standard. The revised threshold reflects sectoral maturity and promotes higher performance expectations without imposing disproportionate regulatory burden. The proposed approach is also aligned with the benchmarking methodology applied under the MSQoS CS 2021.

2.6.10 In addition, the Commission acknowledges the request for further industry engagement, including simulations and explanatory sessions. However, the revised MSQoS CAS has undergone a full Public Inquiry pursuant to sections 55 and 61 of the Communications and Multimedia Act 1998, which constitutes the highest level of statutory consultation. While the Commission remains committed to ongoing dialogue to facilitate implementation, additional pre-determination consultation is not required and must be balanced against the need for timely regulatory enhancement in the public interest.

2.6.11 Accordingly, the Commission determines to retain the proposed standard of a maximum of 10 non-billing complaints per 1,000 for each reporting period. The denominator will be applied proportionately based on active subscriptions for subscription-

based CASPs and audience reach for FTA or non-subscription services to ensure fairness, clarity, and regulatory consistency.

## 2.7 Standard on Customer Complaints Resolution Time

**QUESTION 7:** The Commission seeks views on the proposed relocation of billing related complaint resolution timeframes into a new provision, expanding the standard to cover non-billing complaints, and the revision of complaint resolution time.

<b>Submitting Party</b>	<b>Comments</b>
Net2One	<ul style="list-style-type: none"> <li>• Net2One recommends comprehensive industry engagement, including simulations and detailed briefings, prior to implementation.</li> <li>• Net2One requests retention of the current standard until such engagement is completed.</li> </ul>
Star Media Radio Group	<ul style="list-style-type: none"> <li>• Star Media Radio Group supports the proposed revision, including the relocation of billing and non-billing complaints resolution timeline into a consolidated provision.                             <ul style="list-style-type: none"> <li>- They consider the restructuring beneficial for clarity, consistency, and improved regulatory monitoring.</li> <li>- The consolidation is viewed as enhancing operational alignment and reporting transparency.</li> </ul> </li> </ul>
MPB	<ul style="list-style-type: none"> <li>• Recommends retaining the existing standards: Billing technical complaints:  (a) 90% within 15 business days; and (b) 95% within 30 business days.</li> </ul>

<b>Submitting Party</b>	<b>Comments</b>
	<p>Non-billing technical complaints:</p> <ul style="list-style-type: none"> <li>(a) 70% within 5 working days; and</li> <li>(b) 90% within 15 working days.</li> </ul> <ul style="list-style-type: none"> <li>• For content or regulatory complaints: <ul style="list-style-type: none"> <li>(a) Resolution should be case-by-case due to legal and compliance complexity.</li> <li>(b) Consider the proposed 3-day and 10-day targets unrealistic, particularly for issues requiring external verification (e.g., tower inspections, vendor reports).</li> </ul> </li> </ul>
Astro	<ul style="list-style-type: none"> <li>• Recommends maintaining the current resolution standards without amendment.</li> <li>• Highlights that existing benchmarks (15 days / 30 days) were developed based on global vendor service-level agreements and internationally recognised incident-severity classifications.</li> <li>• Submits that non-billing complaints often involve: <ul style="list-style-type: none"> <li>(a) Technical root cause analysis;</li> <li>(b) Cross-team coordination;</li> <li>(c) Vendor diagnostics;</li> <li>(d) Firmware or software patching;</li> <li>(e) Cloud infrastructure issues; and</li> <li>(f) Third-party content or API disruptions.</li> </ul> </li> <li>• Argues that compressed timelines may not accommodate: <ul style="list-style-type: none"> <li>(a) Multi-layered broadcast and OTT environments;</li> <li>(b) Third-party dependencies;</li> <li>(c) Engineering deployment windows; and</li> <li>(d) Testing cycles required to ensure sustainable resolution.</li> </ul> </li> </ul>

Submitting Party	Comments
	<ul style="list-style-type: none"> <li>Expresses concern that shortened timelines may compromise quality of resolution.</li> </ul>
TM Tech	<ul style="list-style-type: none"> <li>Does not support the proposed shortened timeframes. Recommends retaining:               <ul style="list-style-type: none"> <li>(a) 90% within 15 business days; and</li> <li>(b) 95% within 30 business days.</li> </ul> </li> <li>TM Tech submits that:               <ul style="list-style-type: none"> <li>Many complaints require coordination with upstream content providers and third parties;</li> <li>Content-related complaints may involve societal sensitivities; and</li> <li>Licensees may have limited control over international content feeds.</li> </ul> </li> <li>Warns that stricter KPIs may encourage premature closure of complaints rather than proper resolution.</li> <li>Reiterates that complaint obligations should apply only to active subscription customers, not non-subscribers or promotional users.</li> </ul>

**Table 9:** Responses on Licensees and persons subject to the Mandatory Standards

## Summary of Feedback

2.7.1 The Commission notes that Star Media Radio Group supports the proposed relocation of billing-related complaint resolution timeframes into a consolidated provision, the expanding of the standard to cover non-billing complaints, and the revision of complaint resolution timelines. Star Media considers the restructuring beneficial for clarity and operational consistency and views the proposed targets as generally achievable and conducive to proactive complaint management.

- 2.7.2 However, the majority of the respondents, namely Astro, MPB, TM Tech and Net2One, opposed the proposed shortened timelines of 70% resolution within three days and 90% within ten days.
- 2.7.3 Their concerns primarily relate to operational and technical realities. Respondents submitted that complex non-billing complaints frequently require in-depth diagnostics, coordination with vendors, engineering deployment windows, legal or compliance verification, upstream transmission dependencies, and multi-layered troubleshooting across broadcast, OTT, cloud, and device ecosystems.
- 2.7.4 Astro explained that the existing 15-day and 30-day timelines were developed in accordance with internationally recognised incident-severity standards and established vendor service-level agreements. MPB added that content and regulatory complaints often require extended timeframes due to investigation and legal review processes. TM Tech highlighted operational dependencies on upstream and international content feeds, while Net2One recommended retaining the current standards pending further industry engagement.
- 2.7.5 Overall, respondents considered the proposed shortened timelines to be operationally unrealistic and not fully reflective of prevailing technical and service delivery conditions.

### **Commission's View**

- 2.7.6 The Commission acknowledges that majority of respondents proposed retaining the current complaint resolution parameters and raised concerns regarding the operational feasibility of shorter timelines.
- 2.7.7 The Commission recognises the technical complexity of modern content delivery ecosystems, including dependencies on third-party infrastructure, international content providers, vendor support cycles, and multi-platform environments. However, the obligation to ensure timely and effective complaint resolution

remains fundamental to consumer protection and service accountability.

2.7.8 The proposed revision is intended to harmonise the complaint resolution framework for CASPs with the standards established under the MSQoS CS 2021, thereby promoting regulatory consistency across service categories.

2.7.9 The Commission emphasises that performance measurement focuses on the timeliness and effectiveness of complaint management processes. Enforcement assessment will continue to consider operational context, including documented third-party dependencies and circumstances beyond a licensee's reasonable control, in accordance with established regulatory principles.

2.7.10 With respect to requests for further engagement and simulation exercises, the Commission notes that the revised MSQoS CAS has undergone a full Public Inquiry pursuant to sections 55 and 61 of the Communications and Multimedia Act 1998, which constitutes the highest form of statutory consultation. While the Commission remains committed to continued engagement to facilitate implementation, additional pre-determination consultation is not required and must be balanced against the need for timely regulatory enhancement in the public interest.

2.7.11 Accordingly, the Commission determines to retain the proposed standard on customer complaints resolution time.

### **3. The Way Forward**

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- 3.1 The Commission has carefully considered all submissions received. It acknowledges that certain views may not be fully reflected in this report but affirms that all feedback has been taken into account in reaching its final determination.
- 3.2 The revised Mandatory Standards are intended to achieve the following key objectives:
- (a) To enhance existing quality standards of content applications service and ensure that customers receive reliable and uninterrupted services;
  - (b) To safeguard consumer interests by addressing incorrect charges and promoting transparent, accurate and fair billing practices; and
  - (c) To ensure that CASPs manage and resolve customer complaints in an efficient, fair and timely manner.
- 3.3 The Commission is of the view that national policy objectives must guide the evaluation of feedback received throughout the Public Inquiry process. In particular, the Mandatory Standards support Malaysia's aspiration to position itself as a leading global communications and multimedia hub, while promoting high levels of consumer confidence in digital content services.

#### **Implementation Period and Industry Engagement**

- 3.4 To facilitate compliance and ensure orderly implementation, the Commission will provide a six (6)-month transition period prior to full enforcement of the revised Mandatory Standards.
- 3.5 This transition period will allow CASPs to undertake necessary operational adjustments, system enhancements, internal process refinements, and coordination with relevant partners to achieve effective compliance.

- 3.6 This phased implementation approach ensures that the revised standards are introduced in a proportionate and practicable manner, while maintaining consumer-facing service quality. The Commission will continue to engage with industry stakeholders throughout the transition period to support readiness and ensure smooth implementation.