



7 August 2015

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ACCAN thanks the ACCC for the opportunity to contribute to its consultation on the proposed transitional arrangements for In-Train Orders in the next three waves of Fibre Service Area Modules (FSAMs).

Like the ACCC, ACCAN is also strongly supportive of measures that improve the migration experience and promote service continuity for consumers. Too often end users have found the migration process confusing and challenging. ACCAN has supported previous revisions to the migration process which have improved end user experience. We are also supportive of this measure which further reduces the risk of disconnection for consumers in the three FSAM waves which are affected by this arrangement.

There may be merit in applying these arrangements more broadly than the next three waves. The process to date has been reactive to experiences, which has resulted in greater risks to consumers and uncertainty. In the ACCC's decision on the revised Migration Plan disappointment was expressed by the ACCC about Telstra's 'wait and watch' approach.¹ ACCAN is supportive of more proactive approaches and applying these arrangements more broadly.

Furthermore ACCAN will be contributing to the Department of Communications Migration Assurance Policy (MAP) consultation later this month. Providing certainty through a predictable and straightforward process greatly enhances the experience by end users. Furthermore consistent and accurate information should be available across all parties involved. End users should be aware of the different stages of the process and not fear disconnection due to delays in the installation of equipment for orders placed.

Sincerely

A handwritten signature in blue ink that reads "Rachel Thomas".

Rachel Thomas
Policy Officer

¹ ACCC final decision to approve Telstra's revised Migration Plan.
<http://www.accc.gov.au/system/files/ACCC%20final%20decision%20to%20approve%20Telstra%27s%20revised%20Migration%20Plan.pdf>