



Telecommunications (Statutory Infrastructure Providers – Standards, Rules and Benchmarks) Determination 2021 Consultation

Submission by the Australian Communications Consumer Action
Network to the Department of Infrastructure, Transport, Regional
Development and Communications

15th March 2021

About ACCAN

The Australian Communications Consumer Action Network (ACCAN) is the peak body that represents all consumers on communications issues including telecommunications, broadband and emerging new services. ACCAN provides a strong unified voice to industry and government as consumers work towards communications services that are trusted, inclusive and available for all.

Consumers need ACCAN to promote better consumer protection outcomes ensuring speedy responses to complaints and issues. ACCAN aims to empower consumers so that they are well informed and can make good choices about products and services. As a peak body, ACCAN will represent the views of its broad and diverse membership base to policy makers, government and industry to get better outcomes for all communications consumers.

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1. Introduction

Telecommunications services are a critical enabler for the Australian economy. Individuals and businesses rely on continuous access to telecommunications services to conduct business and carry out day to day tasks. This became more evident during the COVID-19 pandemic, when telecommunications allowed individuals to continue working, accessing services, staying connected to friends and family and receiving education during lockdowns. The pandemic resulted in a significant and permanent shift in behaviours, with many small businesses moving their operations online and workers continuing to work from home.¹ Now, more than ever, telecommunications have become an essential service.

The current consumer protection framework inadequately reflects the essential service characteristics of telecommunications services and the current market structure. It has been ACCAN's long standing policy position that a new regulatory framework be put in place to support the delivery of reliable voice and broadband services.² ACCAN acknowledges that higher service standards will impose a cost on network providers, yet the cost of poor service is already being borne by consumers. These costs are created through productivity losses due to slow speeds and unreliable connections, time spent resolving issues³ and time wasted waiting for missed appointments.⁴

Since 1st July 2020, legislated Statutory Infrastructure Provider (SIP) arrangements obliged certain telecommunications carriers to provide baseline wholesale broadband services in the areas that they service. The obligations including providing voice services where they operate fixed line and fixed wireless networks, and a wholesale broadband service with peak speeds of at least 25 Mbps download and 5 Mbps upload. As part of the SIP regime, the Minister is able to set standards, rules and benchmarks that SIPs must comply with. ACCAN has been calling for the Minister to set appropriate standards for SIPs to ensure minimum service levels to all consumers regardless of network operator.

ACCAN thanks the Department of Infrastructure, Transport, Regional Development and Communications (the Department) for the opportunity to comment on the Statutory Infrastructure Providers – Standards, Rules and Benchmarks Determination 2021. The Draft Determination presents a significant step forward in ensuring telecommunications services are reliable and consumer's expectations are being met regardless of which network serves them. However, ACCAN considers that more could be done to safeguard the delivery of high-quality telecommunications services.

¹ As of December, 2 in 5 Australians continue to work from home <https://www.abs.gov.au/statistics/people/people-and-communities/household-impacts-covid-19-survey/dec-2020>

² See: <https://accan.org.au/our-work/policy/1166-future-guarantee>

³ ACCAN has costed the time consumers spend dealing with telco issues at \$106 - \$130 million over a 12-month period. Note that issues were not only caused by network providers, but this illustrates the cost to consumers of resolving issues with their provider when they occur. <https://accan.org.au/media-centre/hot-issues/1825-still-waiting-the-cost-of-customer-service>

⁴ <http://accan.org.au/media-centre/1673-australians-lose-15m-per-year-to-missed-nbn-appointments>

2. List of recommendations

Recommendation 1: Timeframes for new connections, fault repairs and appointment keeping

- 1) Timeframes for new connections and fault rectification should be set to allow RSPs to meet the Customer Service Guarantee timeframes.
- 2) Timeframes should be measured in days, not working days.
- 3) Associated annual benchmarks that apply to connection, fault rectification and appointment keeping standards should be set to 95%.

Recommendation 2: Service for priority assistance customers

- 1) Maximum timeframes for fault rectification for priority assistance customers living in urban areas should be set to 24 hours, and 48 hours for non-urban residents.
- 2) Benchmarks for priority assistance timeframes should be set to 99.9%
- 3) Penalties for missing benchmarks associated with fault rectification for PA customers should be higher than those for general customers.

Recommendation 3: Speed standards

- 1) SIPs should be required to reach speeds of 25 Mbps or any higher download speed offered 100% of the time.
- 2) SIPs should be required to reach speeds of 5 Mbps or any higher upload speed offered 100% of the time.
- 3) For satellite networks, instances where the speed standard cannot be met should include severe weather conditions.
- 4) Remediation plans should include clear timeframes for when the work will be completed

Recommendation 4: Rebates for missed service standards

- 1) Network providers to automatically provide rebates where SIP standards are missed.
- 2) Compensation amounts should be set in line with the current CSG for voice and broadband services.

Recommendation 5: Instances where standards cannot be met

- 1) A SIP must ensure it complies with a particular standard within 3 business days from the day upon which the circumstance arose or any other longer timeframe as approved by the ACMA.
- 2) The ACMA should be empowered to investigate requests for non-compliance beyond 3 business days in which the circumstances arose, to ensure non-compliance with the SIP standards is caused by legitimate circumstances.
- 3) The ACMA should publish the reasons for approval for non-compliance with the SIP standards.

Recommendation 6: Reliability standards

- 1) SIPs should be required to provide network availability of 99.9%.

Recommendation 7: Compliance reporting

- 1) SIPs should report information relating to compliance with the SIP standards to the ACMA quarterly.
- 2) The ACMA should publish annual reports into SIP compliance with the standards.

3. Importance of Statutory Infrastructure Provider's standards, rules and benchmarks

3.1. Telecommunications are essential services

Telecommunications are essential services and should be regulated accordingly. Access to reliable communication services is vital for Australian consumers and is essential for social and economic participation. The COVID-19 pandemic has demonstrated that communications are essential for a variety of social connections and participation, from keeping in touch with family and friends, to finding information on current affairs, accessing government and health services, as well as cultural, educational and community events. Without competition at the wholesale level, network operators will not deliver in the interests of consumers, so a safety net is needed to ensure a reliable level of service. Where consumers and small businesses are let down by the network providers they rely on, the harm and disruption caused can be costly. For example, ACCAN estimated that missed NBN appointments cost consumers \$15 million in lost time in 2019.⁵ Accordingly, standards, rules and benchmarks should be created to ensure minimum service levels.

3.2. New wholesale and retail rules

The government has established new separation rules for high speed broadband networks to improve commercial opportunities and create fairer competition. Now, high speed broadband networks can either operate as both a wholesaler and retailer depending on the size of the network or choose to be functionally separated. The rules were designed to create new commercial and competitive opportunities for industry with the goal of increasing infrastructure competition.

Where infrastructure competition exists, consumers will be able to choose which network to purchase their telecommunications services from. If consumers have sufficient market information, they will choose to purchase the service which provides the greatest benefit. These networks will have to compete on quality and price to attract customers. However, given economic and technical barriers to entry, it is highly unlikely that multiple fixed line network providers will operate in the same area. This will be the case particularly in areas with high investment costs or low population density. Where network operators face little wholesale competition, they will have no incentive to supply services with appropriate service levels. ACCAN is concerned that encouraging new entrants into the market will result in islands of embedded networks with monopoly power. Therefore, there is a need for standards, rules and benchmarks to be set to ensure that regardless of where a consumer lives or a business operates, they can expect minimum service levels from the network they are served by.

⁵ ACCAN, 2012, "Australians lose \$15M per year to missed NBN appointments", <http://accan.org.au/media-centre/1673-australians-lose-15m-per-year-to-missed-nbn-appointments>

3.3. Wholesale standards will underpin whole of industry

Where SIPs do not have minimum service levels or standards, retailer service providers (RSPs) may choose not to purchase services from them due to the complexity and added cost of purchasing wholesale services with differing qualities, reducing consumers' choice of retailers. SIP standards should encourage retail competition by providing a baseline quality of network which retailers can purchase from.

Furthermore, the ACMA has recently consulted on new rules for retailers who will have to give clear commitments on the service levels they provide. The ACMA has acknowledged that the limited transparency in commercial agreements between retailers and wholesalers makes it difficult to know whether retailers will be able to make such service commitments.⁶ Whilst SIPs are required via the Telecommunications Act to publish the terms and conditions on which they offer to connect premises, including the timeframes for connecting a premise, ACCAN has found it difficult to find this information online. Due to the fact that many of the retail service commitments will depend on wholesale service levels, a varying array of wholesale service standards is likely to result in a web of complex and confusing retail service commitments. This will significantly reduce consumers ability to know and understand their rights when commitments are not met.

⁶ ACMA, 2020. *Service standards for superfast fixed broadband services. Consumer remedies for missed service levels Consultation paper.* pg.13

4. Responses to consultation paper questions - Telecommunications (Statutory Infrastructure Providers – Standards, Rules and Benchmarks) Determination 2021

4.1. Are the draft individual standards, rules and benchmarks appropriate? Why or why not?

For obligations to be sustainable, they should provide for a level of network service which realistically balances consumer need with the technical and resource limits of the network. In comparison to the status quo, the draft standards, rules and benchmarks will improve consumer outcomes. However, in finding a balance between technical limits and consumer need, ACCAN considers there are some instances where the draft Determination prioritises commercial interests over consumer outcomes and further amendments are necessary.

4.1.1. Timeframes for new connections, fault repairs and appointment keeping

New connection and fault repair timeframes

ACCAN was disappointed to find that the proposed maximum timeframes largely mirror those set out in NBN's most recent Wholesale Broadband Agreement (WBA 4), see appendix A for a comparison. It is a reasonable assumption that timeframes set within a commercial agreement were not established with the goal of balancing consumer need and outcomes with the technical and resource limits to the network, but primarily with a profit motive.

Previously, ACCAN has called for maximum timeframes applying to retail service providers to be at least the same as the existing Customer Service Guarantee (CSG).⁷ As the instrument sets out wholesale timeframes, end-users could expect longer timeframes once factoring retail service provider's operational requirements. Thus, the wholesale timeframes should be set to shorter timeframes (for example half a day) than the CSG timeframes.

Under the draft Determination where attendance is not required, or the new connection is type 1 or type 4, the wholesale timeframes provided are short enough to allow retailers to meet the CSG. However, for all other connection types and fault repair, the timeframes do not necessarily allow for RSPs to meet CSG timeframes.

⁷ ACCAN, 2019, *Submission to Consumer Safeguards Review Part B*
<https://accan.org.au/files/Submissions/Consumer%20Safeguards%20Review%20-%20Part%20B%20-%20Reliability%20of%20Services.pdf>

ACCAN is particularly concerned in relation to the timeframes for new connections in premises that are not in proximity to existing fixed line networks or within coverage of wireless or satellite networks, where a network operator has 90 business days in which to connect the premises. This could mean over 4 months of waiting for a new connection. This is an astonishing amount of time to wait for an essential service and is significantly longer when compared to the CSG which required new connections for premises not in close proximity to infrastructure to be connected within 20 business days.

Lastly ACCAN maintains that all timeframes should be defined by days, as opposed to working days, given the essentiality of the service.

Associated annual benchmarks for connection, fault repair and appointment keeping

ACCAN maintains that a benchmark of 90% is too low and should be set higher to a minimum of 95%. Even where network providers meet a benchmark of 90%, the absolute number of missed appointments as well as connections and fault repairs completed outside the maximum timeframe will be substantial. Additionally, a low benchmark does not provide strong incentive for the industry to perform beyond that, particularly if rebates for missed service levels are not necessarily required. Therefore, setting an appropriate benchmark is fundamental to improving consumer outcomes. ACCAN considers a 95% benchmark strikes an appropriate balance between ensuring consumer harm is minimised whilst acknowledging the network costs and practicalities involved in meeting the standards.

Case study: Lengthy fault rectification

Steven contacted ACCAN as he was very concerned at the situation experienced by his 103-year-old mother. For at least 2 weeks, Steven's mother was left without her voice and internet service. As she lives alone, has a diagnosed heart condition, and does not use a mobile this was a very grave situation for her and her family.

When ACCAN raised this with NBN they confirmed that there was a problem with the network and that the fault has been resolved now.

Recommendation 1: Timeframes for new connections, fault repairs and appointment keeping

- 1) Timeframes for new connections and fault rectification should be set to allow RSPs to meet the Customer Service Guarantee timeframes.
- 2) Timeframes should be measured in days, not working days.
- 3) Associated annual benchmarks that apply to connection, fault rectification and appointment keeping standards should be set to 95%.

Priority assistance customers

Customers with a diagnosed life-threatening medical condition require service continuity to be able to seek emergency medical assistance and stay in touch with family members. ACCAN is currently developing a policy position on Priority Assistance which recognises the importance of fixed broadband voice and data services for customers with a critical need for connectivity and broadband, voice or data services.⁸ It is ACCAN's position that updated Priority Assistance obligations should be extended to include priority connection and repair of fixed broadband data services. In order to achieve this, ACCAN recommends SIPs should be required to follow separate fault rectification and connection timeframes and associated benchmarks for Priority Assistance (PA) customers. This will then allow all RSPs to offer Priority Assistance services free of charge to eligible customers.

Offering Priority Assistance services for broadband recognises that broadband services can offer more accessible ways of communicating than the fixed phone service (such as for people who are Deaf or have speech impairment). The maximum timeframes for fault rectification and new connections for a priority assistance customer should be 24 hours for urban customers, and 48 hours for non-urban customers. This would reflect industry-wide Priority Assistance requirements.⁹ This standard should then be supported with a 99.9% benchmark and higher penalties for non-compliance for PA customers than those for general repair timeframes, to reflect the necessity of ensuring these consumers remain connected.

Recommendation 2: Service for priority assistance customers

- 1) Maximum timeframes for fault rectification for priority assistance customers living in urban areas should be set to 24 hours, and 48 hours for non-urban residents.
- 2) Benchmarks for priority assistance timeframes should be set to 99.9%
- 3) Penalties for missing benchmarks associated with fault rectification for PA customers should be higher than those for general customers.

4.1.2. Broadband speed standards

Peak speed standards

ACCAN is concerned that the proposed peak speed standard is not sufficient to ensure improvements in performance and speeds of broadband services. Requiring services provided by SIPs to achieve a peak download speed of at least 25 Mbps at least once each 24-hour period, or otherwise at least 50% of any higher download speed offered (whichever is the higher) is a particularly weak requirement. This standard does not ensure services are consistently delivering the required speeds and does not meet reasonable community expectations of telecommunication networks.

At the wholesale network level there is technical capacity to avoid any slow down during peak periods, therefore the speed standard should reach 25 Mbps or any higher download speed offered 100% of

⁸ ACCAN, 2021, *ACCAN's priority assistance position*, forthcoming.

⁹ Industry Code C609:2007 Priority Assistance for Life Threatening Medical Conditions. Available: <https://www.commsalliance.com.au/Documents/all/codes/c609>

the time. There is no reason why networks should not be able to meet this speed standards, as they should be provisioning sufficient backhaul to ensure there is no congestion. Whilst the end-users experience will depend on multiple factors, the network should be performing at this standard at all times.

By only focusing on download speeds, the draft Determination does not acknowledge that the internet is used for more than consuming content. Peak speed standards need to include upload speeds, as consumers and small businesses rely on upload speeds to carry out day to day activities, such as video conferencing and uploading large files. ACCAN recommends that all networks should reach 5 Mbps or any higher upload speed offered 100% of the time.

ACCAN understands that for Satellite technologies, the network can be impacted by severe weather such as thunderstorms and heavy rains. Section 5 of the draft Determination should be adjusted to recognise that for Satellite networks, instances where the speed standards cannot be met could include such weather conditions.

Benchmarks

The associated benchmark to the proposed peak speed standard is 90% of eligible services in an area each quarter. The peak speed standard and the associated benchmark need to be adjusted so that networks are required to provide peak download speeds of 25 Mbps and upload speeds of 5 Mbps, 100% of the time. ACCAN supports the idea that where peak speed standards are not achieved, the SIP must prepare and publish a network remediation plan. The instrument should specify that the remediation plan sets out clear timeframes for when the remediation will be completed.

Case Study – FTTN Fault rectification and speed issues

Debbie pays for a 25/5 Mbps broadband service, in April 2020 a truck drove through a cable used to connect the household to the NBN which meant her service stopped working. A technician was sent to fix the issue but did not check that the service was working before leaving, so they were sent another technician.

After the cable was fixed, they were able to get speeds of 2 Mbps. Debbie informed her retail service provider, and NBN agreed there was another problem with the network. During this time Debbie, her husband and 3 children all required the internet to continue learning and working during lockdown. Debbie did not have enough mobile data for the 5 of them to use.

Now the network has been fixed, however Debbie says she only reaches speeds up to 25 Mbps ‘on a good day’, and downloads can only get up to 4Mbps, but it is not consistent enough. Debbie is thankful that her children are now back at school, however they still have to turn devices off to watch TV or Zoom.

Recommendation 3: Speed standards

- 1) SIPs should be required to reach speeds of 25 Mbps or any higher download speed offered 100% of the time.
- 2) SIPs should be required to reach speeds of 5 Mbps or any higher upload speed offered 100% of the time.
- 3) For satellite networks, instances where the speed standard cannot be met should include severe weather conditions.
- 4) Remediation plans should include clear timeframes for when the work will be completed.

4.1.3. Transparency of rebates

ACCAN supports the proposal to make any rebates offered by networks transparent. However ACCAN considers that the decision to provide rebates should not be made within commercial agreements but be set as part of the wholesale service standards and rules to ensure that all consumers are entitled to rebates when service levels are missed, regardless of their network provider. This is important given that consumers have very little choice over their network provider. This issue is addressed further in section 4.2.1

Case study – delayed fault repair for non CSG fixed line voice

Greg has a fixed line voice service with My Republic. During a 16-week period he was unable to receive inbound calls. During the 16-week period he contacted My Republic over 20 times via chat, phone and email. My Republic never contacted him about a fault and only replied to two emails. After a couple of weeks Greg contacted the TIO which eventually helped get his service working properly. Once the service was fixed and working properly, he asked about compensation.

Under the CSG Greg would be entitled to over \$3000 however the retailer offered him \$160, less than he paid in monthly service charges during the affected period. He has asked for 25% of the CSG entitlement (\$707) given the time he spent trying to resolve the problem, but My Republic has refused. Greg reported to ACCAN that he will pursue the matter in a small claims court.

Recommendation 4: Rebates for missed service standards

- 1) Network providers to automatically provide rebates where SIP standards are missed.
- 2) Compensation amounts should be set in line with the current CSG for voice and broadband services.

4.1.4. Instances where standards cannot be met

ACCAN considers that the range of draft circumstances where it may not be possible or practical for a SIP to comply with the standards is appropriate, and supports the proposal that SIPs would be required to advise the ACMA and publish information of the cases where they cannot comply with applicable standards. Additionally, ACCAN supports the requirement for SIPs to provide relevant carriage service providers with written notice of maintenance or upgrade with 24 hours prior to the scheduled maintenance or upgrade as well as publish this information on their website. This will help consumers stay informed of why their service might be impacted and help to reduce frustration caused by missed service levels.

Where a SIP is prevented from complying with a standard as a result of a particular circumstance, the instrument proposes that they have within 10 days from the day upon which the circumstance arose to comply with the standard, otherwise they will be required to seek approval from the ACMA. ACCAN considers 10 days to be an excessive period of time in which a SIP will not be required to meet standards, and this should be shortened to 3 days. Any timeframe over 3 days should require approval from the ACMA, and the reasons for ACMA approval must be published to provide accountability for consumers about the extension of the exemption.

The ACMA should be empowered to investigate exemption requests to ensure delays are legitimately caused by force majeure circumstances that are beyond the control of the SIP. Following this, the ACMA should make public the reasons for approving a SIPs request for non-compliance with the standards. Previously, under the CSG timeframes there has been limited transparency and accountability in why exemptions from the timeframes required were permitted.

Recommendation 5: Instances where standards cannot be met

- 1) A SIP must ensure it complies with a particular standard within 3 business days from the day upon which the circumstance arose or any other longer timeframe as approved by the ACMA.
- 2) The ACMA should be empowered to investigate requests for non-compliance beyond 3 business days in which the circumstances arose, to ensure non-compliance with the SIP standards is caused by legitimate circumstances.
- 3) The ACMA should publish the reasons for approval for non-compliance with the SIP standards.

4.1.5. Retention of records

ACCAN supports the proposal that SIPs would be required to retain records in relation to connection, repairs, appointment keeping standards and network remediation plans. ACCAN recommends that this information be reported to the ACMA on a quarterly basis. Providing the information on a quarterly basis will allow for sufficient monitoring and will ensure problems are addressed in a timely manner. Additionally, this would allow for the ACMA to publish network reliability information. This is discussed further in section 4.2.3

4.2. Are there any additional matters that you consider should be addressed through standards, rules or benchmarks? If so, why?

4.2.1. Rebates for missed standards

Given the importance of a reliable communications network to a number of functions in a consumer's life, there needs to be a transparent streamlined mechanism that both encourages improved performance on the part of network operators and that aims to compensate a consumer for loss suffered.

At the retail level the ordinary remedies under contract and consumer law should apply. These should be complemented by compensation paid by the retailer to the customer for extended outages and delays. To ensure the wholesaler is accountable for outages and delays it has caused, a standard setting out a compensation formula would make the SIP liable to reimburse the retailer for these payments. To prevent overlap, a workable delineation between wholesale and retail obligations needs to be developed as a standard. Such rebates have been included in NBN Co's Wholesale Broadband Agreement 4 (WBA 4) showing it is practically possible to create lines of accountability.

However, ACCAN considers that the rebates agreed upon in NBN's commercial agreement do not go far enough to create sufficient incentives for the network to prevent missed service levels, as well as fully compensate consumers for the harm caused. ACCAN continues to call for wholesale service rebates to be set to equivalent amount as the CSG rebates.

4.2.2. Additional Reliability Standards

ACCAN considers that the draft Determination should be amended to include additional standards to improve the reliability of networks. All SIP networks should be required to perform with availability of 99.9%. The equates to 8.67 hours of outage over a year.

Additionally, the Department should consider independent performance benchmarks to address the severity of impact of unreliable services, such as including a standard which limits the number of times a customer's supply is interrupted per year as well as the duration of each interruption.

Recommendation 6: Reliability standards

- 1) SIPs should be required to provide network availability of 99.9%.

4.2.3. Compliance reports

ACCAN considers that it is important for network operators to make available to the ACMA information relating to compliance with the SIP standards:

- Number of connections completed on time
- Number of delayed connections, and duration of delays
- Number of appointments
- Number of missed appointments
- Number of faults repaired on time
- Number of faults not repaired on time, and duration for which the fault remained unresolved
- Number and quantum of rebates paid for delayed connections and delayed fault repairs
- Percentage of time network did not meet the speed performance standard
- Instances the network did not meet the availability standard
- Number of times a customer's supply is interrupted and duration of interruption

It is important that when service standards are missed, the ACMA be made aware of the severity of the issue, therefore duration of delays in connection, and duration for which the fault was not rectified should be reported on. The metrics should be disaggregated by technology and area, as often national averages conceal localised poor performance. The compliance reports should be provided on a quarterly basis in order to identify problems and allow for a timely resolution.

The ACMA should then publish a report on SIP compliance with the standards. Where networks are competing for new customers, for example in new developments, the compliance reports will inform potential customers of which networks perform well, encouraging infrastructure-based competition.

Recommendation 7: Compliance reporting

- 1) SIPs should report information relating to compliance with the SIP standards to the ACMA quarterly.
- 2) The ACMA should publish annual reports into SIP compliance with the standards.

4.2.4. Fault definition

ACCAN is concerned that the definition of a fault has not been provided in the draft Determination. By not specifying what constitutes a fault, this may provide network operators opportunity to narrowly define what a fault is. This significantly weakens the consumer protections provided by the draft Determination.

4.3. What commencement date for the instrument would be appropriate? What factors should be considered in setting a commencement date if the draft standards, rules and benchmarks proceed?

The commencement date of the instrument should occur as soon as possible. We note that many networks already have pre-existing commercial contracts so will not have to comply with the standards before the commercial contracts expire. So long as no SIPs' commercial contracts are to expire immediately, SIPs should have enough time to get the systems in place for meeting SIP standards.

Appendix A. Comparison between proposed SIP standards and WBA 4 timeframes

Direct comparisons are difficult given the differing definitions between the SIP standards and WBA 4, However ACCAN has grouped NBN's service classes into type of new connections as defined by the SIP Standards.

		Urban (10,000 + people)	Rural (200- 9,999 people)	Remote (<200 people)
New Connections				
SIP standard	Attendance not required	By next business day	By next business day	By next business day
WBA4	Service class 3, 13 ,24*, 34	1 business day	1 business day	1 business day
SIP standard	Type 1 - Premises has fixed line network connection and necessary premises equipment	By next business day	By next business day	By next business day
WBA 4	Service class 3, 13 ,24 ,34	1 business day	1 business day	1 business day
SIP standard	Type 2 – premises has fixed line network connection but needs premises equipment installed to finalise connection (i.e. network termination device)	Up to 9 business days	Up to 14 business days	Up to 19 business days
WBA 4	Service class 2,12,22,23*,32,33	9 business days	14 business days	19 business days
SIP Standard	Type 3 – premises not connected to, but in close proximity to fixed network	Up to 14 business days	Up to 19 business days	Up to 19 business days
WBA 4	Service class 1,11, 21, 31	14 business days	19 business days	19 business days
SIP Standard	Type 4 – premises within coverage of fixed wireless or satellite network and has necessary premises equipment (i.e. satellite dish or antenna)	By next business day	By next business day	By next business day
WBA 4	Service class 6, 9	1 business day	1 business day	1 business day

SIP Standard	Type 5 – premises within coverage of fixed wireless or satellite network but needs necessary premises equipment (i.e. satellite dish or antenna)	Up to 9 business days	Up to 14 business days	Up to 19 business days
WBA 4	Service class 5, 8	9 business days for FW 20 business days for satellite	14 business days for FW 20 business days for satellite	19 business days for FW 20 business days for satellite 35 business days if classed as isolated
SIP Standard	Other – i.e. not in proximity to existing fixed line network or within coverage of wireless or satellite network	Up to 90 business days	Up to 90 business days	Up to 90 business days
WBA 4	Service class 0, 4, 7, 10, 20, 30	N/A	N/A	N/A

Fault repairs

SIP Standard	Attendance not required	1 business day	1 business day	1 business day
WBA 4		5 pm next business day	5 pm next business day	5 pm next business day
SIP Standard	Attendance required	Up to 1 business day	Up to 2 business days	Up to 3 business days
WBA 4		5 pm next business day 5 pm third business day for satellite	5 pm second business day 5 pm third business day for satellite	5 pm third business day 5 pm fourth business day for satellite

*service class only services urban areas