



31<sup>st</sup> July 2017

Director, Implementation  
Consumer Broadband Services  
Department of Communications  
Via email: [migration@communications.gov.au](mailto:migration@communications.gov.au)

ACCAN thanks the Department of Communications for the opportunity to contribute to its Migration Assurance Framework.

ACCAN is supportive of measures which ensure “a smooth and timely service transition”.<sup>1</sup> The next three years will see an acute number of premises switching to nbn, which will test the procedures that exist.<sup>2</sup> To ensure positive consumer outcomes it is vital that there are rigorous frameworks in place. Additionally we are pleased to see that in the case of a high number of poor consumer outcomes that the Government “may consider regulatory and legislative mechanisms to improve migration processes and the customer experience”.<sup>3</sup>

ACCAN strongly agrees that “A smooth migration process also requires appropriate avenues for customers to raise issues or queries if they encounter problems related to their retail service provider, or the connection and operation of their NBN service.”<sup>4</sup> Where issues arise it is important that consumers are not passed between RSP and network.

Consumers regularly contact ACCAN when they experience issues migrating to the NBN. Often these are complicated due to non-standard issues arising, or are due to one party not fulfilling their responsibilities. When these occur it can be difficult to get the consumer back on track for a successful migration. While we are supportive of setting out the responsibilities for each party, there needs to be flexibility for when something does go wrong. All the parties involved should accommodate situations that do arise with the intention of consumers having a successful migration and a positive experience.

ACCAN would like to provide the following comments on the MAF, which are also marked up on the attached document.

## INTRODUCTION

1. **Guiding principles in relation to migration** (MAF p.8). The first principle states “it is a customer centric and industry led activity in which interdependencies between the different activities and parties are closely managed”. ACCAN is unclear about the ‘closely managed’

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<sup>1</sup> Pg. 7

<sup>2</sup> Nbn Corporate Plan 2017 estimates that 2.1 m premises will activate in 2017-2018, 2.5m premises in 2018-2019 and 1.2m in 2019-2020.

<sup>3</sup> Pg.9

<sup>4</sup> Pg. 15

reference to activities and parties. There is no body which manages the parties involved in the migration. This might be better expressed as 'coordinated', or 'requires close coordination'?

## INDUSTRY INFORMATION

2. **Unserviceable premises.** On Pg. 13 there is a discussion about non serviceable premises still being able to order a service and not being subject to Cease Sale arrangements. ACCAN believes that this is a more complex situation on the ground than in theory. We have been approached by a number of consumers who moved into a premises, understanding that the premises is ready for service from nbn's website, only to find out that after trying to connect that the premises is not serviceable. This can be difficult to resolve as it can be time consuming and complicated to get a premises re-classified. Clearer information about which premises are not serviceable and quick identification of non-serviceable premises is vital.
3. **Unserviceable premises.** Pg. 13, ACCAN seeks clarification on the sentence relating to unserviceable premises "*customers will still be required to migrate to an alternative service before the Disconnection Date if they wish to maintain continuity of their fixed line services*". Is the Disconnection Date referred to tailored to the specific unserviceable premises? I.e. that the premises is made serviceable and the full migration window is applied to it from that date? Not that the Disconnection Date for the general area applies to the unserviceable premises, in which case the premises may be left without any fixed line service after the disconnection date.
4. **TeleTypewriters (TTY)** are important devices that allow consumers who are Deaf, hard of hearing, or speech-impaired communicate in an equivalent manner to a person with full hearing by telephone. The MAF document omits these essential over the top devices. ACCAN believes references to them should be included on pg. 13, 17, 38 and 39.
5. **Consistent information** Pg. 15, places emphasis on need for timely information from a range of sources, but does not reference competitive retail service providers. Migrating to NBN should increase the range of options for consumers. Consumers often report hearing different information from RSPs about their options, sometime leading the consumer to think that they only have the option to go with that RSP. This may in part be an attempt by RSPs to provide information that would result in them gaining the customer as theirs. It is important that information from all providers is consistent and does not lead the consumer to believe that they have to choose one provider.
6. **Independently purchased devices.** Pg. 16, A number of consumers choose to buy their modem/gateway devices from independent suppliers. Consumers should not have to purchase this equipment from their RSP. However, we do recognise that independently purchased devices may add a complication in the migration. ACCAN questions the sentence "Retail service providers are responsible for providing the equipment and ensuring it is installed correctly". Is the RSP responsible for ensuring that third party devices are compatible and installed correctly?

7. **Consumer testing of services at activation.** Pg. 17, ACCAN questions the need for “residents and businesses need to test their services and confirm they have a working NBN connection at the time of activation” for FTTN and FTTB connections. As a home visit may not be required over these technologies the consumer may not be at home at the time of activation. Realistically, it might be some time after activation. Changing this wording to “RSPs to test service at time of activation and consumers soon after activation” may be more appropriate.

## **NBN CO ROLES AND RESPONSIBILITIES**

8. **Communicating with RSPs and end users about migration.** Pg. 19, ACCAN sees one of nbn’s main responsibilities as communicating with RSPs and end users about migration. We believe that this should be included in the summary box at the start of the section on nbn responsibilities.
9. **Consumers in non-serviceable premises with no existing service.** Pg.19, ACCAN is concerned for consumers who are in non-serviceable premises and have no existing service. For these consumers there may not be many alternative options. As such we believe they should be prioritised in making the premises serviceable.
10. **Nbn to inform consumers of all differences between NBN and existing services.** Pg. 20, ACCAN believes that nbn should inform consumers of all differences that using its network will have for the consumer, including additional power consumption and network limitations. This will be particularly pertinent with FTTC which is reverse-powered, and for voice only consumers who may now need multiple devices connected to the energy supply. Also consumers should have access to information on the limitations of the nbn network, including the maximum speed that can be achieved in FTTN/B areas.
11. **Installation and activation information.** Pg. 21, ACCAN believes nbn has a responsibility to inform RSPs and customers, where possible, of delays in activations and appointment timekeeping. ACCAN has been contacted by a large number of consumers who have taken time off work and waited for technicians to visit, only for no one to show up and no notification of a change. When consumers contact their RSPs, they are not aware of cancellations either and can take hours for them to ascertain why the appointment was missed. As nbn is responsible for installers they should also be responsible for updating consumers and RSPs with issues with appointment keeping as it arises.

## **TELSTRA (AS DISCONNECTING NETWORK PROVIDER) ROLES AND RESPONSIBILITIES**

12. **Telstra process for unserviceable premises.** Pg. 24, ACCAN has a question in relation to the process that Telstra follows when a premise is found to be unserviceable. Can Telstra reverse disconnection for unserviceable premises? Additionally, where there is no lead in cable and the expected timeframe to connect the premises by nbn is a number of months, what services can these consumers receive?

## **OPTUS (AS DISCONNECTING HFC NETWORK PROVIDER)**

13. **Optus migration window.** Pg. 26, ACCAN has a question in relation to the 'migration window' referred to in the section on Optus as a disconnecting HFC network provider. Is this the 18 month migration window as defined on page 7, or the three month period set by Optus?
14. **Shortened Optus migration window may be insufficient for consumers.** Pg. 26, Consumers need sufficient time to make a switch to NBN. Optus are currently providing 90 days for consumers to switch. Compared to Telstra's 18 months this is a lot less. ACCAN questions if this is sufficient time for consumers to migrate.

## **TELECOMMUNICATIONS RETAIL SERVICE PROVIDERS' ROLES AND RESPONSIBILITIES**

15. **RSPs to clarify consumers can choose from a range of RSPs over NBN.** Pg. 28, While RSPs will undoubtedly promote their own service, ACCAN believes they should not do so to the extent that it leads consumers to believe that they have to go with that provider. We have heard from a number of consumers who have been lead to believe that they need to stay with their current provider or they will lose services. Therefore an additional responsibility for RSPs should be that they are clear in their messaging that a consumer can choose from a range of RSPs over NBN.
16. **Information about additional power sockets and power usage.** Pg. 29, ACCAN believes that RSPs also have a responsibility to inform consumers of the possible need for additional power sockets to support multiple devices that may be required and the potential increased power usage of services over NBN. These are also important differences for consumer services which they may not be aware of.
17. **RSPs to test service are operating.** Pg. 30, ACCAN believes that RSPs should also be responsible for testing the service to confirm it is operational and ready for consumer use, once nbn has notified activation of its network. A number of circumstances have arisen where legacy services were disconnected before the NBN was confirmed to be working. This has left consumers without any services for periods of time. Ensuring that services are working is essential.
18. **RSPs to ensure consumers have compatible equipment to support the service.** Pg. 32, ACCAN believes that RSPs should ensure that consumers have the appropriate equipment prior to switching. This could also include third party devices which the consumer can purchase separately.

## **CUSTOMERS ROLES AND RESPONSIBILITIES**

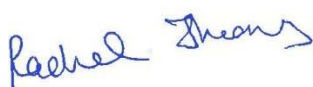
19. **Cost of migrating.** Pg. 40 outlines a responsibility on consumers to cover the costs "*associated with additional upgrading of wiring, change of service or customer premises equipment*". ACCAN is concerned that for some consumers this cost might be significant and prevent them from continuing to have a service. Part of the TUSMA agreement provided

funding to assist vulnerable voice only consumers with these costs.<sup>5</sup> ACCAN believes, if this still exists, should be promoted and easily accessible to these consumers.

20. **Difficulties in obtaining full national number.** Pg. 42 outlines the need for consumers to advise RSPs of their full national number. This number is unlikely to be known by a number of consumers, for example those who have a naked ADSL service. For consumers who are switching providers they are even more unlikely to know this number and may not wish to contact their current RSP. Is there a means to find this number without having to contact the current RSP?

ACCAN would ask that the Department of Communications and the Arts give further consideration to these proposed changes and issues identified above.

Yours sincerely



Rachel Thomas  
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<sup>5</sup> **Voice-only migration** – This estimate of \$15 million per annum is based on analysis of the number of voice-only customers likely to require migration assistance and the costs to provide this migration assistance (i.e. targeted customer assistance and funding to undertake basic rewiring tasks). Funding of these activities is only required until the end of the NBN rollout.