



Australian Government
Department of Communications and the Arts



Migration Assurance Policy Framework

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Forward

The national broadband network will offer all Australian premises access to high speed broadband and telephony services and deliver structural reform of the industry via the structural separation of Telstra's local access networks.

In the national broadband network fixed line footprint, from the time an area is declared 'ready for service' in a particular rollout region, end users and businesses generally have 18 months to migrate services to the national broadband network or alternative operating platforms (the migration window). After this time, any remaining broadband or telephony services on Telstra's local access networks in those areas will be disconnected¹. To minimise the potential for service disruption, end users are encouraged to migrate their services early in the migration window.

One of the Australian Government's priorities for the migration is to ensure that end users experience minimal disruption. However, experience in the initial rollout areas has shown that this has not always been achieved. In some instances, issues relating to inconsistent messaging, serviceability challenges and a lack of clarity around the roles and responsibilities of the various parties involved have had a negative impact on service continuity. Addressing these issues is complicated by the fact that no single party has end-to-end accountability for the migration process.

In recognition of this, the Government, Telstra and nbn agreed to cooperate and work with broader industry to re-examine and improve migration processes through the development of a migration assurance policy (MAP).

A number of streams of work are underway to improve the migration process:

- Specific arrangements, commenced in September 2015, aimed at facilitating the migration of safety-critical services such as nbn-registered fire alarms, lift phones, and monitored medical alarms to the national broadband network or an alternative operating platform.
- The Communications Alliance convened a working committee composed of industry stakeholders (predominantly retail service providers (RSPs)) to develop an industry-led processes and solutions guideline to address key migration issues. This working group released the NBN Migration Management Guideline G652:2014 in December 2014. The working committee is updating the guideline to reflect relevant provisions of the MAP policy and framework.
- nbn and Telstra initiated a process to refine operational arrangements to support improved migration and disconnection processes (reflected in the arrangements announced to industry for service area modules 32 and beyond).
- The Government released a consultation paper in September 2014 seeking submissions from industry and other interested stakeholders in order to obtain a better understanding of migration issues and receive input as to the improvements which could be made to promote an improved, more consistent migration experience for end users.

Learnings from the consultation processes, including those relating to the draft of this framework document, consideration of the work of the other industry processes, and the experience of the first six months of managed disconnections, have informed the development of the following MAP framework.

This framework has been developed by the Government in collaboration with nbn and Telstra to engage industry in developing solutions that address key migration issues and manage the service continuity

¹ A longer timeframe is provided for non-premises and special services (a group of business grade services) which will be disconnected over time on a product-by-product basis.

needs of end users. Therefore, the framework was released to seek industry feedback for further refinement, with a view to industry then owning the framework and putting it into practice.

The MAP framework recognises that there are already a range of commitments and obligations in relation to migration and disconnection which are enforced through regulatory, industry and commercial agreements such as Telstra's Migration Plan, the Definitive Agreements between nbn and Telstra, nbn's Wholesale Broadband Agreement, and Communications Alliance Guidelines. The framework does not seek to reproduce those documents, but rather draws out elements of the migration process that are important for supporting service continuity outcomes.

The Government will monitor improvements to the migration process through a variety of sources including:

- market research conducted by nbn to track end user experience when connecting to services on the national broadband network
- national broadband network related complaints received by the Telecommunications Industry Ombudsman (TIO), and other government entities such as the Australian Competition and Consumer Commission (ACCC), Australian Communications and Media Authority (ACMA) and nbn directly
- correspondence received by the Minister for Communications.

If parties are not adhering to their roles and responsibilities and the migration process results in high instances of poor service continuity outcomes for end users, the Government may investigate other avenues to improve continuity outcomes, such as appropriate regulatory and legislative mechanisms to further reform the migration process.

It is important to note that the MAP framework only applies to the national broadband network fixed line footprint, as premises within the national broadband network fixed wireless and satellite footprints do not need to migrate from the existing Telstra local access networks.

This version of the MAP framework will be updated as required over time, including to reflect the multi-technology mix. The development of new processes, such as those relating to fibre to the node/basement (FTTN/B) and hybrid fibre-coaxial (HFC) solutions will include industry consultation.

Industry migration and disconnection roles and responsibilities

Effective migration requires ongoing co-operation, commitment and resources from all industry stakeholders. The Government recognises that to date industry has worked hard in supporting a successful migration process.

The following section identifies at a high level the roles of key industry stakeholders in migrating end users to the national broadband network. All stakeholders need to play their part to support service continuity for customers, and have a shared responsibility to ensure the timely, effective and fair resolution of any disputes involving the migration of services to the national broadband network.

Role of nbn

- construction, operation and maintenance of the national broadband network
- publication of network and service readiness information
- notifying end users via nbn's Public Information on Migration campaign of the need to migrate existing fixed line services to the national broadband network, and the impact of nbn's network availability on their fixed line services
- serviceability and connection-related activities (to the extent this is associated with a national broadband network connection, service or network element)
- ensuring nbn's network (and national broadband network based products) provide layer 2 wholesale products that allow RSPs to add additional functionality
- maintenance of the Medical Alarm Register and the Fire Alarm and Lift Phone Register
- fault rectification and assurance processes (to the extent this is associated with nbn's aspects of the network and service delivery).

Role of retail service providers (RSPs)

- working with end users to identify all telecommunications services at the customer's premises, that need to be migrated
- developing retail products and services (over the national broadband network or other networks), so that end users can migrate early in the migration window
- informing their end users about the impact, or likely impact, of migration and disconnection of their services and premises (whether the RSP intends to offer national broadband network services or not) and required solutions
- RSPs that offer priority assistance services should notify priority assistance customers who migrate with them to the national broadband network of any differences in the replacement services
- educating their end users and application service providers about product options they offer as an alternative to the services being disconnected
- informing end users of progress and issues or delays relating to their national broadband network connection, including advice on the installation experience, how to prepare for the install, and placement of the network termination device and other end user premises equipment
- if required for the products they are supplying, undertaking any installation/or advising the customer to organise the upgrading of wiring or end user premises equipment associated with migration of their own end users (or end users' premises)
- disconnecting existing Telstra local access network based services as per the business as usual processes once an end user's services have been migrated to the national broadband network, and confirmed as working; or the end user has confirmed they will be transitioning their services to an alternative network (e.g. mobile)
- any billing, account management or other relationship issues associated with their own end users

- working with nbn and other industry stakeholders to migrate end users, including activities to support continuity of service
- fault rectification and assurance processes (to the extent this is associated with RSP aspects of the network and service delivery)
- providing clear information to end users about the telecommunications services they provide over the national broadband network infrastructure, including the differences in those services – this may include any limitations on the porting of existing landline numbers, availability of priority assistance services or enhanced call handling features of their network services (for example – call waiting, call forwarding, call barring, and privacy protection measures such as calling number display and calling number display blocking); providing information to end users may take a range of forms – including making information available on a website – reflecting the fact that various customer segments may differ in their preferred means of accessing information
- communicating with end users about how cease sale may impact the future availability of retail services over the Telstra local access network.

Role of application service providers

(see also section 2.2)

- having products available, or sourcing products, for the migration of their services to the national broadband network or alternative operating platforms
- taking the lead in safely migrating over-the-top services to the national broadband network or alternative operating platforms, including activities to support continuity of service, and working with nbn and other industry stakeholders to achieve this
- providing continuity of service for their own end users' services during and after the migration window, whether that is to a service based over the national broadband network, or a service provided over a different network (e.g. 3G/4G)
- informing their own end users about the impact, or likely impact, of migration on their services and premises, recognising that coordination between RSPs and application service providers is critical
- undertaking any installation or upgrading of wiring or customer premises equipment associated with migration of their own end users (or end users' premises)
- any billing, account management or other relationship issues associated with their own end users
- playing a primary role in migrating the end user services they supply, and working with nbn, RSPs and other industry stakeholders to achieve this.

Role of end users

- informing themselves of the need for migration by reviewing national broadband network related communications material provided by nbn, RSPs, application service providers and other organisations
- identifying equipment needed to migrate and initiating action with RSPs and application service providers to ensure a timely transition of services
- ensuring they register services, where registers are in place for the identification of particular types of over-the-top services
- ensuring that their RSP is aware of any enhanced call handling features (e.g. call waiting, call forwarding, call barring, calling number display and calling number display blocking) they wish to continue accessing once the service is migrated
- placing an order with their preferred RSP when national broadband network services become available, early in the migration window
- attending scheduled nbn, RSP and application service provider appointments

- where the end user is changing to another RSP, placing cancellation orders with their existing RSP
- arranging and covering costs associated with any additional upgrading of wiring or end user premises equipment that may be required.

Role of Telstra (as disconnecting network provider)

- making available to wholesale customers information which is directly related to the disconnection of their services or networks as a consequence of the migration
- reconnecting a service when a disconnection has occurred in error (based on current business as usual processes)
- disconnecting services on the relevant Telstra local access networks at the end of the migration window.

Role of the cabling industry

- providing information and services to assist end users in addressing in-home wiring
- ensuring members are updated with the latest information regarding wiring codes.

Information sharing and data stability

The sharing of data and information between key industry players (RSPs, application service providers, Telstra Wholesale and nbn) while respecting confidentiality and privacy will facilitate the early migration of end users and ensure service continuity is prioritised.

Service providers require certainty of the footprint that is subject to disconnection so that they can in turn provide clear and accurate information to their end users about the timeframe and the actions they need to take to migrate.

The flow of information between all parties should be, where possible, all-inclusive and allow for transparency of migration issues that are identified.

Key data flows include:

- the Historical Footprint List (HFL) which details premises that can be served by nbn's access technologies, including the address information and the service class for each premises included in that list
- the Fixed line Footprint List (FFL) which contains any premises that have been passed by nbn's fixed line network (or which nbn intends to pass) forms the basis of the final disconnection list that is prepared by Telstra
- the final disconnection list provided by Telstra to Telstra Wholesale customers
- end user service and location identification data
- order information flows between Telstra and its customers
- information on active Telstra local access network services between Telstra Wholesale and Telstra Wholesale customers
- order information flows between RSPs and nbn (under the Wholesale Broadband Agreement).

New commitments to improve the flow of information include:

- Pursuant to a carrier licence condition enacted on 21 August 2015, Telstra is required to provide nbn with its location identification data for all active Telstra local access network services in nbn's ready for service regions, where the wholesale customer has not consented to Telstra providing this information. This information will assist nbn with managing the Medical Alarm Register and Fire Alarm and Lift Phone Register, and advising end users to migrate prior to the Disconnection Date. Telstra already provides this information in respect of its own retail customers.

Provision of information to Telstra Wholesale customers from Telstra, on a best efforts basis, at the ready for service date plus 10 business days regarding which premises are in nbn's fixed line footprint and therefore subject to disconnection. This information will be updated monthly (on a best efforts basis) from six months before the Disconnection Date so that service providers have clarity on which of their existing customers are subject to disconnection and can then assist these customers to migrate and understand the implications of disconnection.

Provision of service and location identification and other end user data from application service providers to nbn to support the migration of their customers.

1. Pillar 1 – Serviceability

The first pillar in the migration process is that there is a national broadband network service to migrate to. That is, the national broadband network is available at a specific premises post the ready for service date, and an end user can place an order with an RSP for a national broadband network service and have the order completed. This is referred to as serviceability and is a critical component in driving early migration of end users.

nbn's service class categories indicate whether or not a premises is serviceable on nbn's fibre to the premises network. RSPs cannot order a wholesale service from nbn where premises are classified at service class 0.

At service class 1, service class 2 or service class 3, an RSP can order nbn's wholesale services, with end users generally provided a prompt connection at either service class 2 or service class 3. For those classified service class 1, an RSP order can be placed but lead times in completing a connection will typically be longer as additional work is required to get the connection to the premises.

nbn can declare an area ready for service when at least 90 per cent of premises are passed by its fibre network. However, in early rollout regions, a significant proportion of these premises have been classified service class 0 and therefore RSPs could not order nbn's services, which led to a number of premises being unable to migrate to the national broadband network late in the migration window.

Another serviceability related issue identified in the rollout to date is the incorrect classification by nbn of a premises as serviceable. The error is typically identified when an order has been placed by an RSP and it becomes apparent at the time of the installation that more construction is required for a service to be connected and then activated. Currently the premises is 'rolled back' to service class 0 and the end user's order for a service over the national broadband network is cancelled. Remediation work needs to occur to make the premises serviceable, and once the premises is classified as service class 1 or higher, the end user can re-order a service over the national broadband network. While remediation works are underway, end users who find themselves in this situation are able to place an order for a Telstra local access network service for the remainder of the migration window, as cease sale does not apply to service class 0 premises.

Recognising the importance of serviceability and having sole responsibility for ensuring premises are serviceable, nbn committed in 2014 to ensure fibre to the premises rollout regions have a higher level of serviceability, before a brownfields fibre to the premises rollout region is declared ready for service. nbn announced that in addition to passing 90 per cent of premises, it intends that a high level of serviceable premises is available at ready for service by not only minimizing the number of service class 0 premises but also delivering a minimum 30 – 50 per cent of premises at service class 2, with this percentage increasing progressively. A higher count of service class 2 premises at the start of the migration window will lead to more predictable outcomes for end users and RSPs. The latest indications are that the company has been releasing footprints containing circa 50 per cent service class 2 premises whilst minimizing service class 0 premises well below historical trends.

New commitments to improve serviceability

In addition to changes in thresholds in the upfront release of the footprint, additional changes are being implemented:

- nbn intends to provide higher levels of serviceable premises at ready for service. Serviceability has improved considerably, with the average proportion of Service Class 0 premises at Ready for Service now reducing to around 10-15% in the last 6 months. Service Class 0 premises will be removed from a rollout region and placed in a new Service Continuity Region six months out from the Disconnection Date. These premises will be given an additional 6 months before the managed disconnection process commences, with a plan to address serviceability of those premises. This approach enables the provision of consistent and clear messages to end users and promotes the acceptance of orders ahead of the Disconnection Date.
- For Premises in Service Continuity Regions, nbn intends to achieve at least 90% serviceability of the Service Continuity Region by the Disconnection Date of the relevant Parent rollout region (the 90% target is measured against the aggregate total number of Premises in all the Service Continuity Regions with the same Disconnection Date). nbn will also have a plan to address the serviceability of the remaining premises in the Service Continuity Regions well in advance of the Disconnection Date for those regions.
- To address the issue of premises incorrectly classified as serviceable, nbn is improving operational processes to confirm serviceability records are accurate, thereby reducing the occurrence of this situation. In addition, nbn has agreed that in the six month period leading up to the Disconnection Date, there will be more certainty for RSPs and end users whose premises will be subject to disconnection. Where premises are found to have been incorrectly classified as serviceable when in fact they are not, nbn does not intend to "roll back" these premises to an unserviceable status ("service class 0"). Instead, nbn will use all reasonable endeavours to make the premises serviceable as quickly as possible, while the RSP's order remains intact with nbn.

These actions will assist in promoting a smooth migration to the national broadband network for end users who take the necessary action to migrate in the lead-up to the Disconnection Date.

Maintaining service continuity

- Premises that are not nbn serviceable (service class 0) are exempted from cease sale rules under Telstra's Migration Plan. This means end users whose premises are not nbn serviceable can order a fixed line service that is delivered over Telstra's local access networks even after cease sale has commenced. However, customers will still be required to migrate to an alternative service once their premises becomes national broadband network serviceable (and thus subject to managed disconnection) if they wish to maintain continuity of their fixed line services.

2. Pillar 2 – Product availability

The second pillar in the migration process is that the required products are developed by nbn, RSPs and application service providers to enable services to be migrated early in the migration window.

nbn provides wholesale layer 2 services that RSPs can use as part of the network layer to create their own retail products and services over the national broadband network, which are capable of supporting the migration of existing Telstra local access network-based voice and broadband services. nbn will make available the product technical specifications (including limitations) so RSPs can evaluate the suitability for their services to be migrated.

To drive early migration, nbn, RSPs and application service providers all need to have suitable products for residential and business end users (excluding special services), and associated processes, developed and available well before an area is declared ready for service.

2.1 Broadband Services

The core nbn wholesale service provided to RSPs is nbn's Ethernet Bitstream Service. This is a wholesale layer 2 service which provides Ethernet based connectivity between the nbn at the end user premises and an RSP's network interconnection at one of nbn's 121 Points of Interconnect.

The majority of RSPs who offer services over the nbn use this connectivity to provide a high speed broadband service by combining their own layer 3 services (e.g. email accounts, internet access etc.) to complete their retail offer.

2.2 Voice Services

As part of nbn's Ethernet Bitstream Service offering for FTTP access technology, nbn provides additional Ethernet Bitstream Service features to enable different quality of service options to be developed in RSPs' retail products over the nbn. These features are called traffic classes, and an example is the use of traffic class 1 to provide a priority traffic treatment for priority traffic, such as voice. Traffic class 1 is prioritised over other traffic classes, thus enabling a voice call to continue uninterrupted even if a large volume of broadband traffic is also being downloaded or uploaded at the same time.

Where nbn determines to service a premises using FTTP access technology, nbn provides a Network Termination Device which includes two UNI-V ports which have been provided to allow RSPs to offer a voice service without the need for additional RSP equipment at the end user's premises. These UNI-V ports do not provide a voice service on their own, as they need to be combined and configured with an RSP's voice network equipment to provide voice services (e.g. dial tone, calling capability etc.).

The features and quality of the end-to-end voice service are thus dependent on how the respective RSP has configured its voice network equipment as part of its retail offer.

2.2.1 Migration of 'over-the-top' services

'Over-the-top' services or applications are operated by application service providers over-the-top of voice telephony services on Telstra's local access networks. Over-the-top services include security, medical and fire alarms, lift phones and payment services (EFTPOS and ATMs). The migration to the national broadband network represents the next evolution for the industry, involving changes to technical, cost and performance characteristics.

As these services are supplied via the basic voice service, and not special services, they are subject to the regular 18 month migration window (subject to the limited exclusion from mandatory disconnection until 30 June 2017 for nbn-registered fire alarm and lift phone services).

The role of application service providers

Given the migration to the national broadband network will see voice services predominantly delivered over voice over IP technology, application service providers should:

- consider and make a decision on which deployment path is best suited to their service or application. This could be 3G, dual path or national broadband network-only services
- inform their own end users about the impact, or likely impact, of migration on their services and premises including clear information on any additional costs (e.g. new customer premises equipment) and what steps the customer may need to take in relation to the service (such as registering it with nbn)
- manage the migration of these services on to the chosen deployment path within the 18 month migration window.

If migrating services to the national broadband network, application service providers, particularly providers of over-the-top services such as medical, security and fire alarms, and lift phones, need to:

- test their applications and devices to ensure they work on RSP retail products delivered over nbn's network
- consider the type of retail service needed to support these applications, and communicate this to the end user who will be ordering the RSP's national broadband network based service
- have programs in place to test end user devices and applications (including alarms) promptly after migration to the RSP's national broadband network based service has taken place
- undertake any installation or upgrading of wiring or end user premises equipment associated with migration of their own end users (or end user premises) – where an application service provider chooses not to provide this service option, then the application service provider is responsible for timely and clear communication of the requirements of their equipment and how an end user may be able to get their in-premises wiring upgraded (if required), or provide information on alternative products that offer similar functionality without re-wiring.

nbn has committed to work with these industries to assist them to understand the impacts and assist them to develop product solutions. As part of this, nbn provides plugbench facilities to enable ASPs to test their retail products over a range of RSP's services so that ASPs can determine their product suitability.

This approach recognises that RSPs do not have visibility of the services that are provided over-the-top of their service, and responsibility for the management of the application rests with the party with the requisite knowledge. It is therefore important that end users work with their application service provider to assist in the successful migration of their services early in the migration window, to promote service continuity. However, if RSPs become aware that an over-the-top service is present, they may wish to implement additional processes to accommodate them.

For medical alarms – see the management of medical alarm end users under Section 3.2.1.

For fire alarms and lift phones – see the management of safety critical services under Section 3.3.

2.3 Migration of Special Services

Special services are primarily business grade services currently provided over Telstra’s local access network. More information about Special Services can be found at www.telstrawholesale.com.au/nbn/exemptions/index.htm.

These services are initially exempt from disconnection from Telstra’s local access network, pending either a Telstra initiated product exit, or nbn releasing additional product functionality which enables RSPs to provide alternative services over the national broadband network to the particular type of special service (known as the White Paper process). nbn will publish a series of white papers which outline how its additional product functionality can be used to enable RSPs to provide alternative services over the national broadband network based products to that type of special service.

The ‘Disconnection Date’ for each class of special service will be the date which is 36 months after the publication date of a final white paper in relation to that class. Telstra also needs to agree with nbn that the additional nbn product functionality can be used to provide alternative services to those in the class of special services. This three-year timeframe is important, as the migration of special services is expected to be a complex process. nbn’s special services white papers will be made publicly available on nbn’s website.

2.4 Migration of non-premises

All locations that use a Telstra local access network service for communications but do not meet the ‘Premises’ definition set out in nbn’s Wholesale Broadband Agreement are generally considered to be non-premises. Non-premises include, but are not limited to, traffic lights, payphones, bus stops, bridge controls, mobile phone cell towers, utilities and other infrastructure.

At present, nbn does not include non-premises in the Fixed Line Footprint List and therefore these services are not subject to disconnection at this time.

The Government (represented by the Department of Communications and the Arts), nbn and Telstra have commenced identifying and developing a high level plan to determine the connection and migration strategy for non-premises to alternative technology solutions. Subject to that plan and industry consultation, the timetable for migration and disconnection of non-premises will be established and will commence after 2017.

3. Pillar 3 - End user awareness and management

The third pillar in the migration process is end user management and awareness activities that drive early migration by end users. End users impacted by the national broadband network rollout need consistent and timely messages from all parties regarding the need to migrate early in the migration window to promote service continuity.

End users in a national broadband network rollout region typically receive multiple communications from nbn and their RSP, and in some cases application service providers and other organisations.

End users impacted by the rollout require early and effective communication around the need to migrate existing fixed line services onto the national broadband network. Specifically, end users need to receive consistent, accurate and timely messages from nbn, their RSPs and their application service providers regarding the timing of migration and disconnection, potential impacts of migration (or choice to not migrate) on their service and equipment, and status of their national broadband network connection.

End users should be provided with timely, consistent and reliable information from nbn, RSPs, application service providers and other organisations at regular intervals throughout the migration window.

Specific roles and responsibilities in the end user management process are as follows:

nbn – Public Information on Migration

For the duration of the rollout of the nbn fixed-line network, nbn is required to undertake certain public information and migration activities to support the smooth migration to RSPs' national broadband network based services.

Communications are undertaken throughout the rollout and once an area has been declared ready for service, nbn advises residents in that area via a series of direct mail messages that national broadband network services are available. nbn also provides other important information about switching services to the nbn, focussing on the specific actions they need to take including contacting their preferred RSP to place an order. nbn aims to provide consistent messaging to RSPs and other industry participants for their use to improve end user understanding. nbn also undertakes local area marketing activities and engages with local communities via their council, business and community organisations.

The key focus of the Public Information on Migration activities is to ensure that, to the maximum extent practicable, all end users who have a service to be migrated receive advance notice of the planned migration, and are familiar with the actions required to be taken to migrate. Households and businesses receive information from nbn concerning:

- the national broadband network rollout in their area
- the timeframe for activities
- the actions the end user needs to take to continue to receive fixed line services
- the consequences for existing end users if they do not take action before the Disconnection Date, including the potential for existing over-the-top services to be disconnected or no longer operate.

As a range of groups have a stake in the successful migration of end users to the nbn, Public Information on Migration activities are developed and conducted by nbn in consultation with the Government and Telstra (as the existing infrastructure provider), with regular forums with the wider industry to seek input as part of a continuous improvement process.

The Public Information on Migration Governance Framework allows community, industry and government groups the opportunity to provide feedback on Public Information on Migration activities.

RSPs

The role of RSPs:

- Informing their end users of the impact, or likely impact, of migration and disconnection of Telstra local access network services on their products and services.
- Informing their end users of available product options as an alternative to the telecommunications services being disconnected.
- Migrating end users to a telecommunications product alternative as agreed with the end user
- If required to support the services provided, undertaking/advising the customer to arrange with their RSP, or third party (including the relevant application service provider) any installation or upgrading of wiring or end user premises equipment associated with migration of their own end users (or end users' premises). Note: RSPs may offer this wiring service, but they are not obliged to offer such a service.

Application service providers

The role of application service providers:

- informing their own end users about the impact, or likely impact, of migration on their services (such as alarms)
- safely migrating and providing continuity of service for their own end user services, preferably early in the migration window
- any installation or upgrading of wiring or customer premises equipment associated with migration of their own customers (or customer premises)
- any billing, account management or other customer relationship issues associated with their own end users.

End users

The role of end users:

- reviewing communications and taking the necessary steps to migrate as early as possible, including placing an order with their preferred RSP
- if they have a service such as a security or medical alarm, notifying their application service provider that they are in an nbn ready for service region and working with their application service provider to migrate the service ahead of the Disconnection Date
- if they have a medical alarm, registering their details on nbn's Medical Alarm Register, including monitored and non-monitored medical alarms
- if they have enhanced call handling features (e.g. call waiting, call forwarding, call barring, calling number display and/or calling number display blocking), advising their RSP they would like these features to continue on their migrated service.
- if they have a fire alarm or lift phone, registering the details of that service on nbn's Fire Alarm and Lift Phone Register.

Further information regarding the communication and end user management roles of nbn, application service providers and RSPs can be found in the Communications Alliance *NBN Migration Management Industry Guideline*.

New commitments to improve end user awareness and management:

- nbn is putting further investment in community engagement and has established a national community relations team to manage engagement with major community groups with a national footprint. This team complements the existing community engagement teams that operate at a state based level and engage directly with local community groups.
- Telstra and nbn have agreed to consolidate the number of Disconnection Dates per month. In general there will be one Disconnection Date per month, which will assist in simplifying the migration process and enable more centralised and efficient communication strategies. Telstra and nbn will also seek to avoid any Disconnection Dates occurring in holiday periods.
- Subject to data availability, nbn will, where practicable, implement targeted communications strategies in the final stages of the migration window.
- RSPs should consider supporting early migration by allowing end users to migrate to their national broadband network services without any additional fees or charges for the migration. This recognises that end users migrating early may find they face significant charges for terminating contracts and are therefore unlikely to migrate at that time.

3.1 End user redress

A smooth migration process requires appropriate redress mechanisms for end users if they encounter issues related to their RSP order for a service over the national broadband network, or the connection and operation of their national broadband network service. Better complaint management protocols between nbn and RSPs will mean end users have greater transparency over any issues relating to their national broadband network connection.

In order to ensure a robust end user redress process, parties should undertake the following roles:

End users

As a wholesale carrier, nbn is building the network and sells wholesale services to RSPs, who will then add additional functionality and provide retail services to end users. Therefore, in the first instance, an end user should always approach their RSP if they have any concerns or issues regarding the installation or operation of their national broadband network service.

If an end user does not receive a satisfactory response from their RSP, they have the option to contact nbn directly. However, end users should be aware that nbn will only be able to provide general advice as it will not be aware of the specific arrangements between the end user and their RSP.

If an end user is instructed by nbn or their RSP to undertake a specific activity to resolve their issue (e.g. obtaining landlord consent (for renters), contacting a registered cabler to complete additional wiring, arranging an electrician to install a power point/socket etc.) it is expected that the end user will arrange for this activity to be undertaken in a timely manner.

If an end user receives an unsatisfactory response from their RSP or nbn, they can then contact the TIO to make a complaint.

RSPs

RSPs are to liaise with nbn to resolve any issues an end user may have relating to the order, installation and activation of their national broadband network service. RSPs are also to liaise with Telstra Wholesale to resolve any issues an end user may have relating to disconnection in error.

RSPs are encouraged to keep their end user updated regarding the status of their issue and should do so in plain language that is easy to understand and avoids the use of acronyms and technical jargon.

nbn

nbn is to work closely with RSPs to resolve issues and provide transparent, detailed information as to why these issues may have occurred.

If an end user contacts nbn directly, nbn may provide general network information, but as it is unable to verify the identity of the customer (as the customer's contractual relationship is with an RSP), nbn may be limited in the information it can provide. nbn will try to answer the end user's general network questions, rather than refer them back to their RSP, but the referral may be necessary if the end user wishes to discuss details of their specific RSP order. Any information provided should use language that is easy to understand and avoids the use of acronyms and technical jargon.

Telecommunications Industry Ombudsman (TIO)

The TIO is a dispute resolution service for small business and residential end users who have a complaint about their telecommunications service in Australia. Its goal is to settle disputes quickly in an objective and non-bureaucratic way. The TIO is independent of industry, Government and consumer organisations.

If an end user lodges a complaint with the TIO, the TIO will refer the end user to either the RSP or nbn, depending on the nature of the issue. In referring the end user, the TIO will have regard to the circumstances of the complaint and will consider which party is best placed to assist the end user.

If a complaint is related to an end user's interaction with nbn, for example, damage to property or poor workmanship in relation to nbn equipment installation, the TIO will generally refer the end user to nbn to resolve the issue. If the complaint is related to their interaction with their RSP (e.g. missed appointments and long lead times), the TIO will refer the end user to the RSP.

For certain types of complaints, where the TIO believes it will promote fast and effective resolution, the TIO will notify both the RSP and nbn of the complaint and will encourage engagement between the parties.

3.2 Management of vulnerable end users

It is important that end users who rely upon a fixed telecommunications service for their health or safety (whether because of the application of a medical alarm or otherwise), and other vulnerable end users, successfully migrate to the national broadband network or alternative network platforms prior to the Disconnection Date for their service. Failure to do this may present a risk to their health or safety, or may otherwise result in an unnecessary disruption to their everyday lives. For this reason, migration of these services early in the Migration Window is strongly encouraged. The Government is also keen to ensure that the approach to national broadband network migration takes account of these customers.

The successful migration of these services is reliant upon the end user receiving the necessary information from their application service provider, and from nbn and RSPs where relevant, and taking the appropriate action to migrate before their services are disconnected. In general terms, the customer (or end user) of the telecommunications service is responsible for that service, including migrating the telecommunications service to an alternative network before disconnection, including any over-the-top service or application that is provided over that telecommunications service, such as a medical alarm or similar device. RSPs also have a responsibility to inform their customers of the impacts of migration and disconnection and assist them in the migration process.

As noted above, the national broadband network policy is premised on the mandatory disconnection of Telstra local access network services as the national broadband network is rolled out on a region by region basis, following the Disconnection Date. It is therefore important that the parties who play a part in the migration process take steps to assist in the migration of these services well before the point in time at which mandatory disconnection occurs. The roles set out in the MAP are not intended to change disconnection timeframes or responsibilities, but to ensure that the management of these services occurs within the disconnection requirements and timeframes for services under the national broadband network policy and related commercial arrangements between Telstra and nbn.

Nothing in the MAP, and nothing concerning the disconnection of services and their associated migration to the national broadband network or alternative operating platforms is intended to change the responsibility of the end user for ensuring their telecommunications service, and any medical alarm or other device applied over that service, is in good working order, both pre and post migration. However, end users also need to be informed of the disconnection risk, and be aware of the steps they need to take to successfully migrate their services. In some circumstances, this may be challenging for vulnerable end users.

To assist with this, the MAP sets out suggested actions that should be taken by various parties engaged in the migration process (e.g. end users, medical alarm/application service providers, RSPs, nbn etc.). All of these actions, when taken together, are intended to ensure the end user is made aware of the need to migrate their services (including any medical alarm service) well before disconnection occurs, and the implications of potential disconnection. This will help in ensuring reasonable action is taken well ahead of the Disconnection Date of Telstra local access network services that may be used to support a person's health or safety, to minimise the risk of inadvertent disconnection for vulnerable end users.

It is important to note that once the Disconnection Date is reached and the managed disconnection period begins, telecommunications services of all customers without a valid national broadband network order (including those supporting medical alarms and those used by vulnerable customers) will be subject to service restriction and disconnection. This includes services that are registered on the Medical Alarm Register or which are identified by Telstra as Priority Assistance customers.

Accordingly, end users (and particularly vulnerable end users) need to migrate their services early in the migration window to minimise the risk of disconnection occurring without an alternative service in operation, and to ensure their alternative service is working, before disconnection occurs.

Types of Vulnerable End Users

In the context of migration to the national broadband network or alternative operating platforms, vulnerable end users are categorised by Government using a tiered approach which is determined based on their needs.

Tier one vulnerable end users are classified as those who may be at serious risk due to the migration.

Tier two vulnerable end users are classified as those whose circumstances present barriers to obtaining or understanding information relating to their need to migrate.

3.2.1 Tier one vulnerable end users

For a subset of the population, the act of migrating to the national broadband network (or alternative networks) may bring with it potential outages and disruptions to an end user's services that could pose a threat to their health or wellbeing if they don't have access to alternative mechanisms to communicate, and an adverse situation arises at the time of the service disruption. In light of this, these end users may need a higher level of support to migrate and may require information to be delivered in alternative formats or through alternative parties (other than their RSP or nbn) in order to process information and take the required action. These end user segments include:

- those with medical alarms that function over Telstra's local access networks
- priority assistance end users.

By identifying those end users who are heavily reliant upon their services, strategies can be put in place to minimise any risk to them by incentivising and assisting with early migration.

Medical alarm users

Medical alarms are used to provide a safety net for emergency situations, where the access or use of the standard telephone handset or mobile device is not possible.

The migration of premises with medical alarms is made more complex by the additional technical and financial implications and the necessary careful coordination of several parties involved in connecting the new service (the end user, application service provider, RSP and nbn). Given the number of stakeholders involved, migration therefore raises the risk that there may be service disruption for medical alarm users.

nbn and the Government are continuing to develop ways to assist medical alarm users to migrate to the national broadband network or alternative operating platforms. Importantly, solutions are available, and nbn has established a test facility where many medical alarm providers have tested their services over the national broadband network. In addition, nbn is working closely with providers of monitored medical alarms to help them identify and deploy solutions to their end users to help keep alarms working throughout Australia's nationwide transition to the national broadband network.

Role of medical alarm users:

- taking action to inform themselves about the national broadband network requirements, including when the network may be available in their area, and when action may need to be taken to maintain their telecommunications service and avoid disconnection
- registering the details of their medical alarm on nbn's Medical Alarm Register
- working with their application service provider (if any) and their RSP to safely migrate their telecommunications service during the migration window, whether to a service over the national broadband network, or a service provided over a different network,
 - This includes obtaining the assistance of any party (such as a registered cabler, their medical alarm provider, or an RSP) required to ensure a successful migration of the service and a functioning alternative service that meets their requirements
- contacting the manufacturer of the alarm or the retailer from which they purchased the alarm to find out whether it will continue to function over the national broadband network (for unmonitored medical alarms).

Role of nbn:

- promoting awareness, including via nbn's Public Information on Migration programme, of the impact of migration on end users' services, including the action that needs to be taken to ensure services such as medical alarms are successfully migrated to suitable alternative services early in the migration window, and well in advance of the Disconnection Date. This includes:
 - notifying end users and medical alarm service providers about the impact, or likely impact, of migration on their services, and the need to migrate early, and encouraging them to register on nbn's Medical Alarm Register early and to confirm with nbn when the service has been successfully migrated to another network; and
 - encouraging end users to contact their medical alarm service provider and preferred RSP early in the migration window to reduce the chance of migration difficulties; and
 - developing communication approaches for those end-users who still have remaining active Telstra local access network services close to the Disconnection Date, to encourage migration before mandatory disconnection occurs.
- developing, implementing and managing nbn's Medical Alarm Register, including
 - obtaining the details of the premises at which a service is used to support a medical alarm and
 - maintaining that information by monitoring premises which have been migrated (where advised to nbn)
- providing Telstra with the details of relevant premises at which nbn has been informed a medical alarm service is present, including regular updates to that information.

Role of medical alarm service providers:

- developing products suitable for RSPs' national broadband network based services or alternative networks, including performing tests to ensure that their devices and services continue to work after migration takes place, and develop adequate contingency plans in case of device or service failure
- advising their customers who are in an area where the national broadband network has become, or is about to become, available of the need to take action early in the migration window to ensure their medical alarm service continues to operate post disconnection
- assisting their customers in finding an alternative, workable solution to their existing medical alarm service if the customer is agreeable

- registering their customers on nbn's Medical Alarm Register as early as possible, including providing the relevant contact details for the service, and keeping that information up to date (including confirming a successful migration of the service to an alternative network so the Medical Alarm Register can be updated).

Role of RSPs:

- as part of their communications to their residential end users, informing their end users that the migration may impact any medical alarm they may have
 - including that failure to migrate will result in a loss of service continuity as the Telstra local access network service will be disconnected, and that they should register their medical alarm service on nbn's Medical Alarm Register
- informing the end user to contact their medical alarm service provider if they have a medical alarm to ensure that the device will continue to operate post-migration
- assisting the customer of their telecommunications service to migrate that telecommunications service to the national broadband network or an alternative operating platform, if the customer is in agreement and the RSP supplies alternative services.

Role of Telstra as Disconnecting Network Owner:

- flagging the premises that nbn advises are on its Medical Alarm Register, including updating that information as advised by nbn (e.g. by removing the flag when nbn advises it has been informed of a successful migration of that service to another network)
- advising its wholesale customers and retail business units of the premises that are flagged as having a medical alarm as notified by nbn
- using best endeavours to check with a wholesale customer submitting a disconnection request for a service that is flagged as having a medical alarm that the disconnection of the service should occur, before processing a BAU disconnection request during the migration window. If the wholesale customer consents to the disconnection or does not respond, Telstra may proceed with the disconnection request.

Placing a premises on the register does not prevent it from being disconnected. Telstra is required to disconnect all premises after the Disconnection Date (including those with medical alarms) in accordance with its legal obligations under the Migration Plan and irrespective of whether those services are at premises that are flagged as having a medical alarm or are on the nbn Medical Alarm Register.

Priority Assistance

Priority assistance is a service offered by some RSPs that gives a shorter timeframe for the connection and fault repair of a standard telephone service for end users with a medical condition who are at risk of suffering a rapid, life-threatening deterioration in their condition. Consequently these end users may be seeking the same level of assurance in relation to the connection and fault repair of the new RSPs service as they currently obtain over their Telstra local access network service.

As with other end users, end users of Priority Assistance services are responsible for ensuring their service is migrated prior to the Disconnection Date – preferably early in the disconnection window. The MAP again gives some guidance as to how these customers may be assisted by others involved in the migration process to be aware of the actions they need to take to migrate their services to an alternative network prior to the Disconnection Date, and to take the steps needed to effect that migration.

Role of Priority Assistance end users:

- informing their RSP that they require this service (or a suitable offering) on any substitute service they acquire in migration and placing an order with a RSP that offers those services.

Role of nbn:

- ensuring that nbn's wholesale layer 2 services are available for RSPs
- providing special service levels for Priority Assistance connections and Priority Assistance service assurance
- making premises serviceable in a timely manner to allow the migration of the end user to occur well ahead of the Disconnection Date.

Role of RSPs:

- if requested, informing end users whether they offer a Priority Assistance service and if not, advising of RSPs that do
- if the RSP does offer Priority Assistance services, advising relevant end users of the impact, or likely impact, that the migration may have on their services, including that failure to migrate will result in the service being disconnected.

3.2.2 Tier two vulnerable end users

Additionally, there are other end user segments that could also be considered vulnerable because they may require information delivered in alternative formats and/or through alternative parties (other than their RSP or nbn) in order to process information and take the required action to migrate. These segments include:

- those with a severe chronic illness, disability, or some form of cognitive or sensory impairment (e.g. dementia, learning difficulties and blindness)
- the elderly (65+)
- those with limited English proficiency
- those with mental and behavioural disorders (e.g. severe anxiety and depression).

While acknowledging the significant efforts by nbn and RSPs to educate end users through standard communications, a more tailored approach may be helpful to effectively reach these end user segments as it is important that they receive information from a trusted source or in an accessible format. This approach recognises that identifying tier two end users is difficult, and will largely be undetectable by RSPs. For this reason, the approach for these end users involves nbn working with community groups to assist in the communications to these end users, as well as RSPs maintaining their communication efforts to their customers regarding their migration, as noted above. Many companies also provide disability awareness training to their staff, and this approach is to be commended.

New commitments to improve communications to tier two vulnerable end users

nbn is working with community groups to improve communications to vulnerable groups of end users within the community by providing consistent messaging frameworks for use by the groups, as well as seeking feedback on appropriate formats. These community groups may include but are not limited to:

- National Seniors Australia
- Australian Council of Social Services
- Federation of Ethnic Communities Councils of Australia
- Australian Multicultural Community Services

- Vision Australia
- Meals on Wheels
- Legacy
- Australian Blindness Forum.

3.3 Management of safety critical services (fire alarm panels and lift phones)

If a fire alarm or lift phone service is not successfully migrated to the national broadband network or an alternative operating platform prior to disconnection, the resulting service disruption could present a significant risk to building occupants or lift passengers in the event of an emergency. Consequently, the successful migration of these services is reliant upon the responsible parties receiving the necessary information and taking the appropriate action to migrate these services before they are disconnected.

In general terms, the end user responsible for ordering the telecommunications service including any over-the-top service such as a fire alarm or lift phone is responsible for the migration of the service. This is usually the building manager or owner/s.

All buildings that have a lift must comply with relevant building codes and Australian Standards, including workplace health and safety standards. Under these standards, lifts must be equipped in such a way that assistance can be sought in the case of an emergency. Responsibility for ensuring that these obligations are met rests with the building owner, or in the case of a strata title, the relevant body corporate (together referred to as the relevant building manager). Similarly, the building codes and relevant Australian Standards establish requirements for fire alarms, including fire alarm monitoring, within buildings. It is the responsibility of the relevant building manager, to ensure these requirements are met.

It is the relevant building manager's responsibility to ensure any fire alarm or lift phone service is in good working order and meets all regulatory requirements, both pre and post migration. If the relevant building manager is not also the end user responsible for the telecommunications service on which the fire alarm or lift phone is provided, then it is expected that the relevant building manager will work with the end user to ensure the fire alarm or lift phone service is maintained according to the relevant regulatory standards.

To carry out their obligations effectively, the building managers responsible for the maintenance of a fire alarm or lift phone service need to be informed of the disconnection risk, and be aware of the steps they need to take to promote compliance with their obligations.

The paragraphs below set out suggested actions that should be taken by various parties engaged in the migration process (e.g. end users, relevant building managers, alarm service providers, RSPs, nbn etc.) to minimise the risk of the services being disconnected before they have migrated.

Long-term migration arrangements for identified fire alarm and lift phone services

To support the migration of identified fire alarm and lift phone services, the Government (represented by the Department of Communications and the Arts), in consultation with nbn and Telstra, has developed a model that responds to industry feedback that more time is needed to determine the most appropriate migration path (whether national broadband network-based or an alternative network) and to develop associated product solutions:

- An embargo, until 30 June 2017, on the mandatory disconnection of identified and nbn-registered fire alarm and lift phone services. To be eligible for the embargo, the service must be registered on nbn's Fire Alarm and Lift Phone Register (including the service phone number).
- A Fire Alarm and Lift Phone Migration Roundtable, and associated Working Groups (one each for fire alarms and lift phones), has been convened for the duration of the embargo period. Membership includes fire alarm and lift service providers, state and territory agencies with responsibility for fire services and Work Health and Safety matters, and peak bodies such as Communications Alliance, Strata Community Australia, the Property Council of Australia, the Owners Corporation Network, the Fire Protection Association of Australia and the Australian Elevator Association, nbn and RSPs.
 - The Roundtable meets quarterly to inform the policy framework for the migration of fire alarm and lift phone services and monitor its implementation.
 - The Working Groups are determining the most appropriate migration path for their respective services (whether national broadband network-based or an alternative network), and working to develop suitable product and battery backup solutions to which these services can migrate.

To enable a service to be identified and registered, the following information must be notified to nbn for all fire alarm and lift phone services:

- the service telephone number corresponding to the fire alarm or lift phone service (ten digits including area code) – this should be provided as a matter of priority;
- the contact details of the party most responsible for management of the line associated with this service;
- the physical address where the service is located; and
- confirmation, once migrated, of when the service has been migrated to the national broadband network or an alternative operating platform.

Further action is also required by application service providers to develop and refine suitable internet protocol products or alternative network products and battery backup solutions, and determine the most appropriate migration path for their services. There is also action required to design targeted communications that all parties – application service providers, nbn, RSPs, government, and industry bodies – can use to provide clear and consistent messaging to building owners, bodies corporate and strata/building managers who purchase the fire alarm and lift phone services.

Role of relevant building managers:

- taking action to inform themselves of migration requirements, including when the national broadband network may be available in their area, and when action may need to be taken to maintain their fire alarm or lift phone service
- taking responsibility for migrating and promoting the continuity of their fire alarm or lift phone services during the migration window, whether to a service over nbn's network, or a service provided over an alternative network.

- This includes obtaining the assistance of any party (such as a registered cabler, lift phone or fire alarm monitoring service provider or an RSP) required to ensure a successful migration of the service
- working with their application service provider and their RSP to obtain a suitable alternative service for fire alarm or lift phone services subject to disconnection
- registering their fire alarm or lift phone services on nbn's Fire Alarm and Lift Phone Register (which includes providing the correct telephone numbers of the relevant services) and updating the register to confirm the fire alarm or lift phone has been successfully migrated to the national broadband network or an alternative operating platform, when that occurs
- working with the customer of the telecommunications service over which the fire alarm or lift phone is provided to ensure the above takes place (in circumstances where for some reason the customer of the telecommunications service is not the relevant building manager)
- arranging and covering costs associated with any additional upgrading of wiring or equipment that may be required
- after fire alarm and lift phone services have been migrated, informing their lift phone or fire alarm monitoring service provider of the fact and requesting a test be carried out to ensure successful migration to the alternative service.

Roles of lift phone maintenance service providers & fire alarm monitoring service providers:

- registering details of all fire alarm and lift phone services they provide on nbn's Fire Alarm and Lift Phone Register. This includes:
 - providing the relevant telephone number for the service,
 - providing the relevant contact details for the service
 - keeping registered information up to date
 - providing confirmation through the register when the service has been successfully migrated.
- advising their customers who are in an area where the national broadband network has become, or is about to become, available, of the need to take action early in the migration window if they are impacted by the migration
- assisting their customer in finding an alternative, workable solution to their existing fire alarm or lift phone service where requested by their customer
- developing products suitable for the ongoing support of fire alarm and lift phone services
- where they have been advised that a service has migrated, performing tests to ensure that the fire alarm or lift phone service continues to work after migration takes place. This includes:
 - developing adequate contingency plans in case of device or service failure
 - ensuring that migrated services are maintained and continue to operate in accordance with relevant standards.

Role of nbn:

- promoting awareness, including via its Public Information on Migration programme, of the impact of migration on end users' services, including the action that needs to be taken to ensure services such as fire alarms and lift phones are successfully migrated to suitable alternative services early in the migration window, and well in advance of the Disconnection Date for their rollout region. This includes:
 - developing ways to notify building managers/owners, bodies corporates, lift maintenance providers, fire alarm monitoring companies and end users about the impact, or likely impact, of migration on their services, and the need to migrate early, and encouraging them to register on nbn's Fire Alarm and Lift Phone Register early and to confirm with nbn when the service has been successfully migrated to another network; and

- encouraging end users and building managers to contact their lift maintenance provider, fire alarm monitoring provider and preferred RSP early in the migration window to reduce the chance of migration difficulties; and
- developing communication approaches for those end users who still have remaining active Telstra local access network services close to the Disconnection Date, to encourage migration before mandatory disconnection occurs.
- developing, implementing and managing the Fire Alarm and Lift Phone Register, including seeking to obtain the telephone number of fire alarm and lift phone services from parties registering
- providing Telstra with regular Fire Alarm & Lift Phone Register data feeds that contain the relevant telephone number of the fire alarm and lift phone service, including updates to that information. This includes:
 - notifying Telstra of updates to the fire alarm or lift phone services on the nbn register, by regular updates to the register, where nbn is notified that the service has been successfully migrated to the national broadband network or an alternative operating platform
- ensuring that national broadband network services are installed in a timeframe that enables other parties to migrate fire alarm and lift phone services without unreasonable service disruption (where the migration includes nbn-based services)

Role of RSPs:

- as part of their communications to their end users, informing their end users that the migration may impact any fire alarm or lift phone service they may have – including that failure to migrate will result in the service being disconnected
- as part of their communications to their end users, informing the end user that they should register their fire alarm and lift phone service (or encourage the relevant building manager to register any fire alarm or lift phone service they may have on nbn's Fire Alarm and Lift Phone Register) as early as possible
- informing the end user to contact their application service provider to ensure the fire alarm or lift phone service will continue to operate post-migration
- assisting the customer of their telecommunications service to migrate that service before disconnection, if the customer is agreeable to this.

Role of Telstra as Disconnecting Network Owner:

- flagging the premises that nbn advises are on its Fire Alarm and Lift Phone Register by advising of the relevant telephone number, including updating that information as advised by nbn
- provide nbn with regular information on its local access network services until the relevant fire alarm and lift phone Disconnection Date
- advising its wholesale customers and retail business units of the premises that are flagged as having fire alarm or lift phone services as notified by nbn, so that they can manage migration of those services well before the Disconnection Date
- disconnecting its local access network services after the Disconnection Date in accordance with its Migration Plan obligations and irrespective of whether those services are on the Fire Alarm and Lift Phone Register, or are flagged as a fire alarm or lift phone premises
- before processing a business as usual disconnection request during the migration window in relation to any fire alarm or lift phone premises notified by nbn, checking with a wholesale customer submitting that disconnection request that disconnection of the premises should occur.

State Authorities/Regulatory Bodies of Building Codes/Australian Building Standards

In addition to the above, all State Authorities/regulatory bodies involved in building code regulation that includes fire alarms or lift phones will be encouraged to include on their websites, and in the information made available to builders or relevant building managers, statements about the impact of the national broadband network rollout on fire alarm and lift phone services. This should reiterate the need for parties to take action early in the migration window to ensure a successful migration of their service prior to the Disconnection Date in order to maintain compliance with relevant building regulations and the safety of occupants of their premises.

Peak fire alarm and lift phone bodies (including the Australasian Fire and Emergency Services Authorities Council, the Australasian Fire Land Management and Emergency Services Industry, Fire Protection Association of Australia, and Australian Elevator Association)

Peak bodies will be encouraged to include on their websites, and in the information made available to their members, statements about the impact of the national broadband network on fire alarm and lift phone services. This should highlight the need for parties to take action to ensure a successful migration of their service prior to the Disconnection Date in order to maintain compliance with relevant building regulations and the safety of occupants of their premises.

Tenants, Occupants and Landlords of Buildings with a fire alarm or lift phone service

All tenants, other occupants, and landlords of buildings with a fire alarm or lift phone service in an area where the national broadband network is available, or is about to become available, are encouraged to speak with their relevant building manager, to ensure that all reasonable steps are being taken to migrate the fire alarm or lift phone service to a reliable and safe alternative service early in the migration window, well prior to the Disconnection Date.

4. Pillar 4 - Installation and activation of national broadband network services

The fourth key pillar in the migration process is that once an end user places an order, it is installed and activated in a timely manner.

nbn needs to provide accurate, consistent and timely rollout forecasts to the industry. This in turn will result in more accurate and timely activation forecasts provided by RSPs. This will inform the community messaging with regard to the timing of nbn's network availability in an area, and encourage early migration. Providing adequate resources as a part of a better planning process also means that the activation timeframe for national broadband network services can potentially be shortened, hence improving end users' experience in migrating to the national broadband network.

The key roles and responsibilities in the activation and installation of a national broadband network service are as follows:

Role of nbn:

- providing accurate and timely rollout forecasts and serviceability information to the industry
- managing its workforce so as to facilitate the timely connection of services on its network
- arranging a suitable appointment time with the RSP for the installation of an end user's national broadband network service
- advising the RSP ahead of time if the agreed appointment time cannot be kept
- completing and testing the installation of nbn's Network Termination Device
 - if the installation is unable to be completed, informing the end user and the RSP why this has occurred.

Role of RSPs:

- Providing accurate order forecasts to nbn (noting the dependencies on accurate ready for service dates and serviceability information), and that there may be challenges in doing this, particularly early in the migration experience.
- Taking an end user's order.
- Seeking to arrange an appropriate installation time with nbn and the end user, and advising the end user in advance if the agreed appointment time changes.
- Seeking to arrange an appropriate RSP installation time (if required) with the end user, and advising the end user in advance if the agreed appointment time changes.
- Undertaking any installation or upgrading of wiring or end user premises equipment associated with migration of their own end users (or end user premises) to their national broadband network service (this does not include wiring to support third party equipment, such as alarms) or directing the end user to a registered cabler to do any necessary wiring work.
Note: RSPs may offer this wiring service, but they are not obliged to offer such a service.
- Confirming their national broadband network order has been installed and services migrated (including any porting) before placing a business as usual cancellation request in relation to the Telstra local access network service.

Role of the cabling industry:

- Developing consistent arrangements to assist end users in addressing in-home wiring issues, for example through the development of a revised cabling code that addresses in-home wiring issues associated with migration to the national broadband network.

New commitments to improve the installation and activation of national broadband network services include:

- nbn is continuing to undertake initiatives to increase and optimise its installation capacity
- improved ready for service forecasting and higher service class 2 thresholds before a region is declared ready for service will lead to more predictable and accurate install workforce capacity planning
- nbn will, where necessary, phase the release of service area modules in particular regions where adequate installation resources are unavailable to meet demand, so that lead-times for end user orders are not impacted
- nbn and RSPs will communicate to end users in areas of 'high demand' and which may be subject to long lead times.

Promoting service continuity

In order to maintain service continuity:

- End users and RSPs should seek to manage the disconnection of Telstra local access network services, if possible, at a time that allows their national broadband network service to have been activated and confirmed as working and all services have been migrated. It is noted that this may not be possible in circumstances where the end user ports their number to another RSP's national broadband network service, or where technologies other than FTTP are deployed by nbn.
- If a Telstra local access network service is disconnected in error before an end user's national broadband network service has been activated, and the customer advises their RSP of this event, the RSP and Telstra will reconnect the service as soon as practicably possible.
- During the migration window, Telstra may offer local access network services in certain circumstances where an end user is unable to obtain a national broadband network connection. This includes where a Telstra local access network connection is available at the premises and a premises is not national broadband network serviceable.
- nbn and Telstra have agreed to varied arrangements which allow additional time for the connection of national broadband network services where orders for an nbn service remain open or 'in-train' at the Disconnection Date. For more detail, refer to Telstra's Varied Migration Plan and associated documents, on the Australian Competition and Consumer Commission's website.

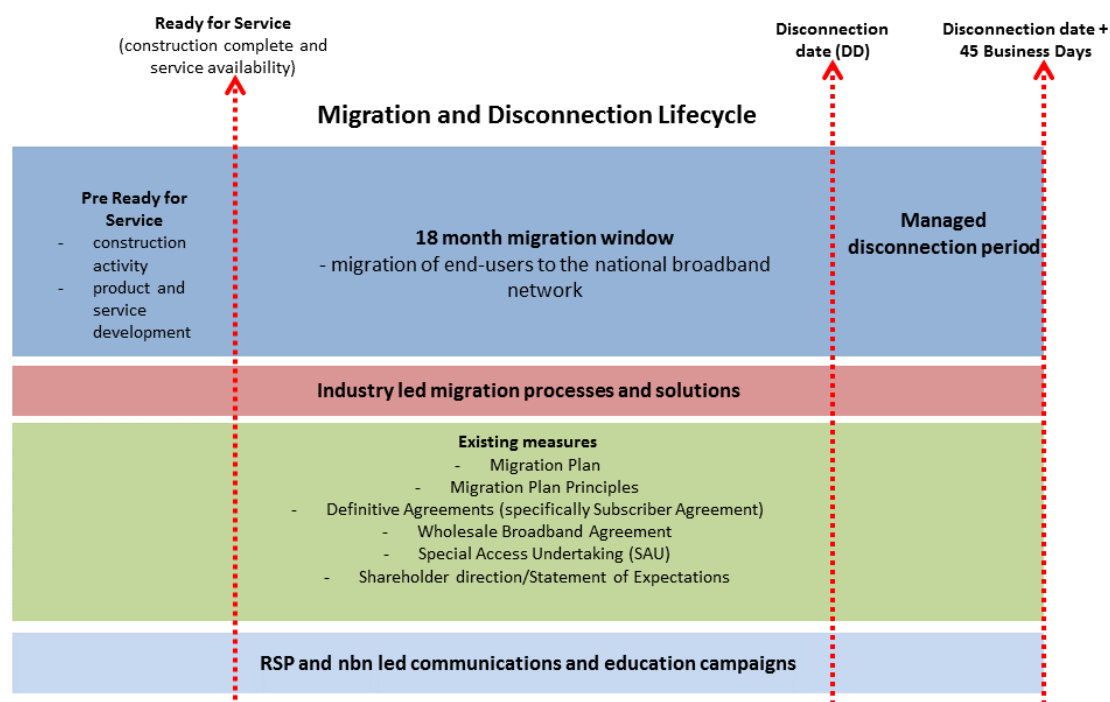
Mandatory disconnections

The mandatory disconnection of services provided over Telstra local access networks is a core part of the Government's policy to achieve the structural separation of Telstra. The process for mandatory disconnections is governed by Telstra's Migration Plan, which is subject to Australian Competition and Consumer Commission approval and oversight. The focus of the MAP framework is to drive the migration of end users well before the Disconnection Date so end users can be confident in the migration experience and minimise the risk of disruption to their services, and RSPs can initiate business as usual service cancellations without the need for mandatory disconnection. It is recognised, however, that despite the best efforts of nbn, RSPs and other parties, there may remain a subsection of the community who do not migrate before the Disconnection Date. A portion of these may not be taking up a national broadband network service and understand their Telstra local access network service will be disconnected.

For end users at premises that remain on the Telstra local access network at the Disconnection Date, disconnection of services on these networks must occur in line with Telstra's obligations under its Migration Plan. In summary, for these end users, disconnection will occur in the following way:

1. Premises that are not In-Train Order Premises (and don't have a special service at their premises as at the Disconnection Date) will, so far as practicable, receive a soft dial tone service no later than fifteen business days after the Disconnection Date. While Telstra implements soft dial tone service for retail and wholesale voice line rental customers, it will be up to the unconditioned local loop service based operators to decide whether they also wish to provide customers with soft dial tone or similar service restriction. Therefore while most premises will receive a soft dial tone, it will depend on the end user's RSP.
2. Where a premises became connected to nbn's network shortly before the Disconnection Date, or where there is a valid and open order for a national broadband network service at the premises and that order is received by nbn up to 25 business days after the Disconnection Date, existing Telstra local access network services at the premises will be kept in place for a period after the Disconnection Date. For the most part, this allows nbn and RSPs a period of up to approximately six months (i.e. 120 business days) after the Disconnection Date to complete the connection of an order and activation of a national broadband network service before the final backstop date at which any Telstra local access network services (other than special services) are mandatorily disconnected.
3. If end users do not take action within sufficient time to have their RSP order placed with nbn and their national broadband network connection completed by their RSP, they risk disruption to their service. Failure to take any action within the timeframes specified above will result in their Telstra local access network service proceeding to be permanently disconnected shortly after the Disconnection Date.

Migration and disconnection process – key documents



NB. This diagram is a simplification of the actual arrangements for diagrammatic purposes only.

There are a number of commercial, regulatory and other arrangements that relate to aspects of the processes for disconnecting end users from Telstra local access networks and migrating them to the national broadband network. The summary below has been provided to assist stakeholders to better understand the current migration governance arrangements about which the Department is seeking comment.

Definitive Agreements between nbn and Telstra

The Definitive Agreements set out the commercial arrangements for the disconnection of premises in the national broadband network fixed line footprint from Telstra’s local access network (and also disconnection of interim wireless and interim fibre services provided by Telstra to premises in nbn’s fixed line footprint). It also sets out nbn access to certain Telstra infrastructure. These arrangements facilitate the structural separation of Telstra. The disconnection arrangements are set out in the Disconnection Protocols which are part of the Definitive Agreements.

Migration Plan Principles and Specified Matters Instrument

Under the *Telecommunications Act 1997* the Minister for Communications may make two instruments, known as the Migration Plan Principles and the Specified Matters Instrument, which set the required scope of Telstra’s Migration Plan. The Australian Competition and Consumer Commission must accept Telstra’s Migration Plan if it is satisfied the Plan complies with the Migration Plan Principles.

The Specified Matters Instrument sets out matters which may, or must not, be included in Telstra’s Migration Plan and any additional matters not dealt with in the Migration Plan Principles.

Telstra's Migration Plan

On 27 February 2012, the Australian Competition and Consumer Commission approved Telstra's Migration Plan which sets out the actions Telstra will take when disconnecting end users from its local access networks. Disconnection under the Migration Plan gives effect to Telstra's Structural Separation Undertaking and reflects the commercial arrangements set out in the Disconnection Protocols.

Telstra's Migration Plan seeks to provide wholesale customers with control over the timing of the migration of their end users' services to nbn's network (to the extent they can), although this migration must occur within the 18 month migration period. Telstra has committed to using existing 'business as usual' processes where possible for disconnecting premises. Telstra lodged a draft varied Migration Plan with the ACCC on 20 March 2015, which was approved by the Australian Competition and Consumer Commission on 26 June 2015. For more information, please visit: <http://www.accc.gov.au/regulated-infrastructure/communications/industry-reform/telstras-migration-plan/variation-approved-multi-technology-nbn-revised-definitive-agreements>.

nbn's Special Access Undertaking

nbn's Special Access Undertaking sets out the prices and non-price terms and conditions for access to its fibre, fixed wireless and satellite networks and related services. The Australian Competition and Consumer Commission accepted nbn's Special Access Undertaking under section 152CBA of Part XIC of the *Competition and Consumer Act 2010* on 13 December 2013. It expires in 2040.

For more information, please visit: www.nbnco.com.au/sell-nbn-services/special-access-undertaking-sau.html#.VHPDLYuUdAA

nbn's Wholesale Broadband Agreement

nbn's Wholesale Broadband Agreement is its standard form access agreement for the supply of national broadband network services to RSPs. The terms of the Wholesale Broadband Agreement are consistent with those set out in nbn's Special Access Undertaking. For more information, please visit:

www.nbnco.com.au/sell-nbn-services/supply-agreements/wba2.html#.VHOyl4uUdAA

Shareholder direction/Statement of Expectations

nbn is a Government Business Enterprise and is wholly-owned by the Government. From time to time, the Government issues nbn with a Statement of Expectations to guide the next steps in delivering on the Government's national broadband network policy. The current Statement of Expectations directs nbn with regard to migration and disconnection to take proportionate responsibility for the quality, consistency and continuity of service experienced by RSPs and their end users and include in nbn's Corporate Plan specific treatment of end user migration and migration of services. For more information, please visit: www.nbnco.com.au/corporate-information/about-nbn-co.html#.VHPH04uUdAA

Public Information on Migration

As part of its activities, nbn is required to conduct public information activities to ensure to the maximum extent practicable that every end user who is on a service to be migrated to national broadband network receives advance notice of the planned migration, is familiar with the action required to migrate, and, unless they make a decision that they do not wish to take a national broadband network service, initiates the necessary migration process prior to the disconnection of the relevant service to their premises.

Glossary

Application service provider means a supplier or provider of any over-the-top services or applications supplied over a telecommunications network or using a carriage service, including (without limitation):

- (a) medical alarms
- (b) emergency alarms (e.g. fire alarms and indicator panels)
- (c) payment services (ATMs, EFTPOS, HICAPS)
- (d) lift phones
- (e) disability services and equipment
- (f) remote infrastructure.

Assurance processes means migration processes, and the processes and measures that ensure networks, products, services and operational capability exist, (and to the extent practicable) enable end users to have continuity of supply during disconnection from telecommunications networks and migration to the national broadband network.

Brownfields are pre-existing commercial or residential site with access to existing telecommunications infrastructure where no previous Open Access Wholesale fibre access has been provided to premises.

Business as usual refers to the normal conduct of business irrespective of a different working environment.

Cease sale refers to the regulatory arrangements set out in Telstra's Migration Plan that prohibit Telstra from connecting new local access network services to premises that have been declared ready for service in the national broadband network fixed line footprint.

Disconnection Date refers to, for a rollout region, the date that is generally 18 months after the region was declared ready for service by nbn and specified as the Disconnection Date for that region in the nbn Rollout Schedule published by Telstra from time to time at <http://www.telstrawholesale.com.au/download/document/rollout-list.pdf>.

End users are the final downstream customers of RSPs.

Guidelines are documents produced for the telecommunication industry by Communications Alliance with which compliance is voluntary (although they may be enforceable through reference to the Guideline in a contract or through adoption by a regulator). They cover a range of industry topics including consumer, operational and technical matters. The guidelines relevant to the MAP is *NBN Migration Management Guideline G652:2014*

Industry Guidance Notes are documents created by Communications Alliance (sometimes with involvement of other relevant stakeholders) to address a need for further guidance and/or clarification for a specific topic that has caused confusion among industry participants in the past or has the potential to do so. The industry guidance note relevant to the MAP is *IGN 004 Migration of Back-to-Base Medical and Security Alarms to Fibre To The Premises (FTTP) Open Access Networks*, which is currently being reviewed to include guidance for a broader range of services.

Over-the-top services are operated by application service providers over-the-top of voice telephony services on Telstra's local access networks. Examples can include medical alarms, security alarms, fire indicator panels, lift phones and payment services (EFTPOS and ATMs).

Migration window for a rollout region, means the period commencing on the ready for service date and ending on the Disconnection Date for that rollout region.

Multi dwelling unit (MDU) means building or structure which comprises more than one premises (whether used for residential, business, government or other purposes) and which may include common areas.

NBN Migration Management Industry Guideline refers to the document that was developed by the Communications Alliance Working Committee (WC63) to clarify the roles and responsibilities of relevant parties in the migration process and was first released on 22 December 2014.

Premises means each of the following:

- (a) a location at an address currently used on an on-going basis for residential, business (whether for profit or not), government, health or educational purposes
- (b) a school as defined by the Department of Education, Employment and Workplace Relations
- (c) a location within a new development at an address for which nbn is the wholesale provider of last resort
- (d) a location at an address for a Standard Telephone Service which is activated in compliance with the universal service obligation
- (e) a payphone at a location at which Telstra is required to install or maintain a payphone in accordance with an instrument made under section 12EF of the Consumer Protection Act
- (f) a location which nbn is directed by the Minister to connect to nbn's Fibre Network
- (g) a multi dwelling unit common area where, and for so long as, it is notified by nbn to Telstra as being included in the Fixed Line Footprint in a rollout region.

Premises passed means that a premises is included in the Fixed Footprint List determined based on information notified by nbn to Telstra and is further defined in Telstra's Migration Plan.

Ready for service means an area is ready to accept/provision service orders from RSPs for serviceable premises.

Rollout region refers to an area (which may be a service area module) that nbn intends to serve using the nbn Fixed Line Network.

RSPs (retail service providers) are those service providers that provide telecommunications services to end users and have a direct customer relationship with end users. This includes wholesaler and aggregator service providers whose customers would be providers on-selling services to their own end user customers.

Service area module means an area, defined by polygon boundaries, selected by nbn in accordance with nbn's design rules that covers a maximum of 4,000 premises (which may be a small town or part suburb in the case of large cities).

Serviceability means the ability of one of nbn's RSP customers to place a national broadband network connection order into nbn's ordering systems for a specified premises.

Service class 0 means the service class determined by nbn that applies to a premises that is:

- in the footprint of the nbn Fixed Line Network and
- not national broadband network serviceable for the purposes of the nbn's Ethernet Bitstream Service using FTTP access technology and supplied by means of nbn's Fixed Line Network.

Service class 1 means the service class that is determined by nbn and applies to a premises:

- that is in the footprint of nbn’s Fixed Line Network
- that is national broadband network serviceable for the purposes of nbn’s Ethernet Bitstream Service using FTTP access technology and supplied by means of nbn’s Fixed Line Network and
- where a physical connection is not in place between the network access point and the premises connection device, including where:
 - the Drop Fibre or premises connection device has not been installed or
 - some augmentation or patching between the premises connection device and the network access point is required for the supply of nbn’s Ethernet Bitstream Service supplied by means of nbn’s Fixed Line Network.

Service class 2 means the service class determined by nbn and that applies to a premises:

- that is in the footprint of nbn’s Fixed Line Network
- that is national broadband network serviceable for the purposes of nbn’s Ethernet Bitstream Service using FTTP access technology and supplied by means of nbn’s Fixed Line Network
- where a physical connection is in place between the network access point and the premises connection device (including where the Drop Fibre and premises connection device are installed as part of nbn’s Fixed Line Network) and no augmentation or patching between the premises connection device and the network access point is required for the supply of nbn’s Ethernet Bitstream Service supplied by means of nbn’s Fixed Line Network and
- where the Network Termination Device has not been installed.

Service class 3 means the service class determined by nbn and that applies to a premises:

- that is in the footprint of nbn’s Fixed Line Network;
- is national broadband network serviceable for the purposes of nbn’s Ethernet Bitstream Service using FTTP access technology and supplied by means of nbn’s Fixed Line Network
- where a physical connection is in place between the network access point and the premises connection device (including where the Drop Fibre and premises connection device are installed as part of nbn’s Fixed Line Network) and no augmentation or patching between the premises connection device and the network access point is required for the supply of nbn’s Ethernet Bitstream Service using FTTP access technology and supplied by means of nbn’s Fixed Line Network
- to which nbn can remotely provision the supply of nbn’s Ethernet Bitstream Service using FTTP access technology and supplied by means of nbn’s Fixed Line Network and
- the Network Termination Device has been installed, is receiving mains power and can be made operational as part of nbn’s Fixed Line Network.

Service continuity refers to an end user’s ability to access substitute telecommunications services in a seamless manner during the migration to the national broadband network during the 18 month migration window, and after the Disconnection Date.

Soft dial tone means a service restriction that allows an end user at a premises with a line rental service to call Telstra’s customer service and fault centre numbers and to make emergency calls, but does not otherwise allow end users to make or receive other calls, or to receive other network services.

Telstra’s local access networks refer generally to Telstra’s copper and hybrid fibre-coaxial cable networks.

Telstra Migration Plan means the Migration Plan given by Telstra Corporation Limited to the ACCC under section 577BDA of the Telecommunications Act, as amended from time to time.